JSC HALYK BANK

Separate Financial Statements and Independent Auditors' Report For the Year Ended 31 December 2019

Table of contents

	Page
STATEMENT OF MANAGEMENT'S RESPONSIBILITIES FOR THE PREPARATION AND APPROVAL OF THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019	1
INDEPENDENT AUDITORS' REPORT	2-6
SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019:	
Separate statement of financial position	7
Separate statement of profit or loss	8
Separate statement of other comprehensive income	9
Separate statement of changes in equity	10-11
Separate statement of cash flows	12-13
Notes to the separate financial statements	14-101

Statement of Management's Responsibilities for the Preparation and Approval of the Separate Financial Statements for the year ended 31 December 2019

Management is responsible for the preparation of the separate financial statements that present fairly the financial position of JSC Halyk Bank ("the Bank") as at 31 December 2019, the related statements of profit or loss, comprehensive income, changes in equity and cash flows for the year then ended, and of significant accounting policies and notes to the financial statements (the "financial statements") in compliance with International Financial Reporting Standards ("IFRS").

In preparing the separate financial statements, management is responsible for:

- properly selecting and applying accounting policies;
- presenting information, including accounting policies, in a manner that provides relevant, reliable, comparable and understandable information;
- providing additional disclosures when compliance with the specific requirements in IFRS are insufficient to enable users to understand the impact of particular transactions, other events and conditions on the Bank's separate financial position and financial performance; and
- making an assessment of the Bank's ability to continue as a going concern.

Management is also responsible for:

- designing, implementing and maintaining an effective and sound system of internal controls, throughout the Bank;
- maintaining adequate accounting records that are sufficient to show and explain the Bank's transactions and disclose with reasonable accuracy at any time the separate financial position of the Bank, and which enable them to ensure that the separate financial statements of the Bank comply with IFRS;
- maintaining accounting records in compliance with the Republic of Kazakhstan legislation;
- taking such steps as are reasonably available to them to safeguard the assets of the Bank; and
- preventing and detecting fraud and other irregularities.

These separate financial statements of the Bank for the year ended 31 December 2019 were approved by the Management Board on 6 March 2020.

Umut B. Shayakhmetova Chairperson of the Board 6 March 2020 Almaty, Kazakhstan Pavel Cheussov
Chief Actourtant

6 March 2020
Almaty, Kazakhstan

INDEPENDENT AUDITORS' REPORT

To the Shareholders of JSC Halyk Bank

Opinion

We have audited the separate financial statements of JSC Halyk Bank (the "Bank"), which comprise the statement of financial position as at 31 December 2019, the statement of profit or loss, statement of other comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, and notes to the separate financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying separate financial statements present fairly, in all material respects, the financial position of the Bank as at 31 December 2019, and its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards ("IFRSs").

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing ("ISAs"). Our responsibilities under those standards are further described in the *Auditors' Responsibilities for the Audit of the Separate Financial Statements* section of our report. We are independent of the Bank in accordance with the International Ethics Standards Board for Accountants' *Code of Ethics for Professional Accountants* (the "IESBA Code") together with the ethical requirements that are relevant to our audit of the separate financial statements in the Republic of Kazakhstan, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

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

Why the matter was determined to be a key audit matter?

How the matter was addressed in the audit?

Collective assessment of the expected credit losses on loans to customers

As at 31 December 2019, the Bank reported total gross loans of KZT 4,107,864 million, including KZT 1,199,824 million subject to collective impairment assessment, which comprise 29% of total gross loans. The expected credit losses ("ECL") resulting from this assessment amounted to KZT 107,689 million.

For loans assessed on a collective basis there is a risk of errors in the underlying data used in assessment of ECL, including errors in loan data (maturity date or outstanding balances), inaccurate or incomplete inputs and assumptions used in assessing probability of default (PD), loss given default data (LGD) and inconsistency of historical and forward-looking information with available market based data.

Due to the significance and subjectivity of judgements used by management and the volume of loans assessed on a collective basis, we identified the collective assessment of expected credit losses as a key audit matter.

Refer to Notes 3, 4, 13, 21 and 32 to the separate financial statements for the description of the Bank's policy and disclosures of gross carrying amounts and related allowances balances.

We obtained an understanding of processes and control procedures related to the loan origination, credit risk management and ECL assessment for loans to customers, assessed on a collective basis.

We challenged the reasonableness of the methodology on collective loan loss provisioning and its compliance with IFRS 9 *Financial Instruments* requirements.

We checked that the data inputs and key assumptions used in the models for assessing PDs and LGDs reflect historical information about incurred credit losses adjusted for relevant forward-looking macroeconomic factors.

With the involvement of our actuarial and internal valuation specialists, we tested the mathematical accuracy and computation of the ECL on loans to customers assessed on a collective basis by re-performing and calculating elements of the expected credit losses based on relevant source data. This included assessing the appropriateness of model design and formulas used, considering modelling techniques and recalculating PDs, LGDs and Exposure at default.

On a sample basis, we tested the accuracy and completeness of the data used in the ECL models, such as collateral values and statistics for recoveries of loans, we traced back information used in the ECL models to source data and also assessed the appropriateness of forward-looking information used in the models.

We evaluated the adequacy and completeness of disclosures in the separate financial statements relating to the loans to customers in accordance with IFRS requirements.

We found no material exceptions in these tests.

Individual assessment of the expected credit losses on loans to customers

As at 31 December 2019, the Bank's gross loans assessed for impairment on an individual basis amounted to KZT 2,908,040 million, which accounts for 71% of total gross loans. The related ECL comprised KZT 258,888 million.

The amount of allowances for the ECL on individually significant loans is dependent on the accuracy of allocation of loans to appropriate stage of impairment in the provisioning system of the Bank.

In particular, there is a risk that exposures with significant increase in credit risk and credit-impaired exposures (movements between stage 1, stage 2 and stage 3 and vice versa) are not completely or accurately identified/classified as at the reporting date, as not all relevant qualitative and quantitative and forward-looking information was captured.

Additionally, the ECL on individually significant credit-impaired loans in stage 3 may be misstated due to errors related to the estimation of future cash receipts or use of inappropriate or unsupported information.

Due to the significance of the allowance for expected credit losses on individually assessed loans and the complexity and subjectivity of management's judgements, we identified the individual assessment of ECL as a key audit matter.

Refer to Notes 3, 4, 13, 21 and 32 to the separate financial statements for the description of impairment indicators on individually significant loans and disclosure of gross carrying amounts and related allowances for such loans.

We obtained an understanding of the loan origination and credit risk management processes. We assessed the Bank's definitions of significant increase in credit risk and credit-impairment for assessment of individual loans' ECL. We also evaluated the design and implementation of controls related to individual assessment of the ECL on loans to customers.

For a sample of loans identified as stage 1, we performed a detailed credit review and challenged the Bank's analysis of whether there was a significant increase in credit risk (stage 2) or default (stage 3). In order to evaluate whether the loans have been appropriately classified to the respective stage, we analysed internal credit ratings (scoring), credit risk factors and checked if relevant impairment events, such as delinquency of interest or principal, restructuring events and certain financial performance indicators, had been identified on a timely manner.

On a sample basis, we re-performed calculations of allowances for ECL for individually significant loans in stage 2 and 3, including reviewing the Bank's documented credit assessment of the borrowers, challenging assumptions underlying the ECL calculation, such as future cash flow projections and the valuation of collateral held, as well as agreeing key assumptions to supporting documents.

We evaluated the adequacy and completeness of disclosures in the separate financial statements relating to the loans to customers in accordance with IFRS requirements.

We found no material exceptions in these tests.

Emphasis of Matter

As described in Note 2 to the separate financial statements, the Bank also prepares consolidated financial statements. These separate financial statements should be read in conjunction with the consolidated financial statements, which were authorized for issue by the Management Board on 6 March 2020.

Other Information - Annual Report

Management is responsible for the other information. The other information comprises the information included in the Annual report, but does not include the separate financial

statements and our auditors' report thereon. The Annual report is expected to be made available to us after the date of this auditors' report.

Our opinion on the separate financial statements does not cover the other information and we will not express any form of an assurance conclusion thereon.

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

When we read the Annual report, if we conclude that there is a material misstatement therein, we are required to communicate the matter to those charged with governance.

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

Management is responsible for the preparation and fair presentation of the separate financial statements in accordance with IFRSs, and for such internal control as management determines is necessary to enable the preparation of separate financial statements that are free from material misstatement, whether due to fraud or error.

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

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

Auditors' Responsibilities for the Audit of the Separate Financial Statements

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

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

- Identify and assess the risks of material misstatement of the separate financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on

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

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

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

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

Mark Smith Engagement partner Chartered Accountant Institute of Chartered Accountants of Scotland License Nº M21857 Glasgow, Scotland

Nurlan Bekenov General Director

Deloitte LLP

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State license on auditing in the Republic of Kazakhstan

№ 0000015, type MFU-2, issued by the Ministry of Finance of the

Deloitte.

Republic of Kazakhstan dated 13 September 2006

6 March 2020 Almaty, Republic of Kazakhstan

МФ-0500114 Zhangir Zhilysbayev Qualified auditor

of the Republic of Kazakhstan **Qualification** certificate No.MF-0000116

dated 22 November 2012

Statement of Financial Position as at 31 December 2019

(Millions of Kazakhstani Tenge)

	Notes	31 December 2019	31 December 2018
ASSETS			
Cash and cash equivalents	5, 36	1,599,692	1,685,874
Obligatory reserves	6	133,033	105,856
Financial assets at fair value through profit or loss	7	4,653	97,927
Amounts due from credit institutions	8, 36	110,409	93,493
Financial assets at fair value through other comprehensive income	9	1,545,893	1,699,468
Debt securities at amortised cost, net of allowances for expected			
credit losses	10	1,199,253	1,044,939
Investments in subsidiaries	11, 36	218,460	172,308
Investments in associate	12	26,732	20,437
Precious metals	William Manna	9,248	3,496
Loans to customers	13, 36	3,741,287	3,443,755
Property and equipment	14	114,830	113,536
Assets held for sale	16	38,026	47,714
Intangible assets	15	5,929	5,227
Current income tax assets	22		32,928
Other assets	17, 36	71,740	64,142
Total assets		8,819,185	8,631,100
LIABILITIES AND EQUITY			
LIABILITIES			
Amounts due to customers	18, 36	6,306,773	6,435,987
Amounts due to credit institutions	19, 36	279,687	168,594
Financial liabilities at fair value through profit or loss	7	20,009	7,016
Debt securities issued	20, 36	846,861	901,221
Provisions	21	3,859	2,094
Deferred tax liability	22	44,272	64,712
Current tax liability	22	9,742	
Other liabilities	23	59,646	27,132
Total liabilities		7,570,849	7,606,756
EQUITY			
Share capital	24	212,690	212,690
Share premium reserve		1,880	1,880
Treasury shares		(106,626)	(106,626)
Retained earnings and other reserves		1,140,392	916,400
Total equity		1,248,336	1,024,344
TOTAL LIABILITIES AND EQUITY		8,819,185	8,631,100

On behalf of the Management Board:

Umut B. Shavek smetova Chairperson of the Boards

6 March 2020 Almaty, Kazakhatan

Pavel A Cheusson Chief Accountant

6 March 2026 a Almaty, Karakhstar

The notes on pages 14 to 101 form an integral part of these separate financial statements

Statement of Profit or Loss for the Year Ended 31 December 2019

(Millions of Kazakhstani Tenge, Except for Earnings per Share which is in Tenge)

	Notes	Year ended 31 December 2019	Year ended 31 December 2018
Interest income calculated using the effective interest method Interest expense	26, 36 26, 36	685,247 (317,741)	653,998 (329,611)
NET INTEREST INCOME BEFORE CREDIT LOSS EXPENSE		367,506	324,387
Credit loss expense	21	(23,432)	(27,062)
NET INTEREST INCOME		344,074	297,325
Fee and commission income Fee and commission expense	27, 36 27, 36	117,805 (52,029)	116,429 (43,781)
Fees and commissions, net		65,776	72,648
Net (loss)/gain from financial assets and liabilities at fair value through profit or loss Net realised gain/(loss) from financial assets at fair value through other comprehensive income Net foreign exchange gain/(loss) Share in profit of associate Dividends received from subsidiaries Other income	28 29 12 36	(21,555) 6,766 43,750 5,742 12,375 5,507	110,469 (1,593) (67,101) 2,899 40,958 24,593
OTHER NON-INTEREST INCOME		52,585	110,225
Operating expenses Loss from impairment of non-financial assets (Other credit loss expense)/recoveries of other credit loss expense	30, 36 16 21	(112,532) - (1,727)	(114,020) (22,099) 16,283
NON-INTEREST EXPENSES		(114,259)	(119,836)
INCOME BEFORE INCOME TAX EXPENSE Income tax expense	22	348,176 (33,532)	360,362 (78,834)
NET INCOME		314,644	281,528
Basic and diluted earnings per share (in Kazakhstani Tenge)	31	26.77	24.86

On behalf of the Management Board

Umut B. Shayakhmetova Chair person of the Board

6 March 2020 Almaty, Kazakhstan Pavel A. Cheussov Chief Accountant

6 March 2020 Almaty, Kazakasta

The notes on pages 14 to 101 form an integral part of these separate

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Statement of Other Comprehensive Income For the Year Ended 31 December 2019

(Millions of Kazakhstani Tenge)

	Notes	Year ended 31 December 2019	Year ended 31 December 2018
Net income		314,644	281,528
Other comprehensive income:			
Items that will not be subsequently reclassified to profit or loss:			
Gain resulting on revaluation of property and equipment			
(2019, 2018 - net of tax - KZT 18 million, KZT nil)		127	1,830
Items to be subsequently reclassified to profit or loss:			
Gain/(loss) on revaluation of debt financial assets at fair value through other comprehensive income, including impaired during		12.1.12	(44.407)
the year (2019, 2018 – net of tax –KZT nil) Reclassification adjustment relating to financial assets at fair value through other comprehensive income disposed of during the year		42,143	(11,127)
(2019, 2018 - net of tax - KZT nil)		(6,766)	1,593
Share in other comprehensive income/(loss) of associate		553	(167)
Other comprehensive income/(loss) for the year		36,057	(7,871)
Total comprehensive income for the year		350,701	273,657

Umut B. Shayakhmeto and PECRYS Chairperson of the Board A. Areussov Chief Accountant

6 March 2020
Almaty, Kazakhstan

The notes on papes 1 lette 101 form an integral part of these separate financial statements.

Statement of Changes in Equity for the Year Ended 31 December 2019

(Millions of Kazakhstani Tenge)

	Share capital Common shares	Share premium reserve	Treasury shares	Revaluation reserve of financial assets at fair value through other comprehensive income*	Property revaluation reserve*	Retained earnings*	Total equity
31 December 2018	212,690	1,880	(106,626)	(9,737)	14,723	911,414	1,024,344
Net income	-	-	-	-	-	314,644	314,644
Other comprehensive income	-	-	-	35,930	127	-	36,057
Total comprehensive income	-	-	-	35,930	127	314,644	350,701
Dividends - common shares	-	-	-	-	-	(126,709)	(126,709)
Release of property and equipment revaluation reserve on							
depreciation and disposal of previously revalued assets	-	-	-	-	(877)	877	
31 December 2019	212,690	1,880	(106,626)	26,193	13,973	1,100,226	1,248,336

Statement of Changes in Equity for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

	Share capital Common shares	Share premium reserve	Treasury shares	Revaluation reserve of financial assets at fair value through other comprehensive income*	Property revaluation reserve*	Retained earnings*	Total equity
31 December 2017 Impact of adopting IFRS 9	147,358	1,880	(106,620)	(362) 326	13,603	728,374 (12,826)	784,233 (12,500)
Restated opening balance under IFRS 9	147,358	1,880	(106,620)	(36)	13,603	715,548	771,733
Net income Other comprehensive (loss)/income	#: 	.=	- 7	- (9,701)	- 1,774	281,528 56	281,528 (7,871)
Total comprehensive (loss)/income				(9,701)	1,774	281,584	273,657
Common shares issued Treasury shares purchased Dividends - common shares Effect due to the legal merger with JSC Kazkommertsbank Release of property and equipment revaluation reserve on depreciation and disposal of previously revalued assets	65,332 - - -	:	(6) - -	-	- - - - (654)	(69,381) (16,991) 654	65,332 (6) (69,381) (16,991)
31 December 2018	212,690	1,880	(106,626)	(9,737)	14,723	911,414	1,024,344

^{*} These amounts are included within Retained earnings and other reserves in the statement of financial position.

On behalf of the Marragement Board:

Umut B. Shayakhmetova Charperson of the Board

March 2020 Almaty Kazakhsta Pavel A Cheussov Chief Accountant

6 March 2020 Almaty Kazak

he notes on pages 14 to 10 form an integral part of these separate financial statements.

Statement of Cash Flows for the Year Ended 31 December 2019

(Millions of Kazakhstani Tenge)

	Year ended 31 December 2019	Year ended 31 December 2018
CASH FLOWS FROM OPERATING ACTIVITIES:		
Interest received from cash equivalents and amounts due from credit		
institutions	35,058	30,533
Interest received on financial assets at fair value through other		
comprehensive income	40,893	33,430
Interest received on debt securities at amortised cost, net of allowances for		
expected credit losses	92,516	53,932
Interest received from loans to customers	433,838	335,972
Interest paid on amounts due to customers	(210,728)	(226,328)
Interest paid on amounts due to credit institutions	(4,033)	(3,549)
Interest paid on debt securities issued	(67,009)	(59,340)
Fee and commission received	118,395	112,072
Fee and commission paid	(51,554)	(43,434)
(Payments for)/receipts from derivative financial instruments	(1,499)	12,812
Other income received	5,506	18,101
Operating expenses paid	(97,602)	(103,466)
Cash flows from operating activities before changes in net operating assets Changes in operating assets and liabilities: (Increase)/decrease in operating assets:	293,781	160,735
Obligatory reserves	(27,177)	(43,013)
Financial assets at fair value through profit or loss	73,218	43,308
Amounts due from credit institutions	(15,651)	35,817
Precious metals	(4,907)	1,685
Loans to customers	(345,799)	(105,950)
Assets held for sale	30,888	24,411
Other assets	(7,988)	18,269
(Decrease)/increase in operating liabilities:		·
Amounts due to customers	(71,440)	190,093
Amounts due to credit institutions	110,954	(98,926)
Financial liabilities at fair value through profit or loss	12,993	1,102
Other liabilities	24,612	(95,117)
Cash inflow from operating activities before income tax	73,484	132,414
Income tax paid	(11,302)	(57,440)
·		
Net cash inflow from operating activities	62,182	74,974
CASH FLOWS FROM INVESTING ACTIVITIES:		
Net cash inflow from the legal merger with JSC Kazkommertsbank	-	823,144
Purchase and prepayments for property and equipment	(45.446)	(4.007)
and intangible assets	(12,146)	(4,937)
Proceeds on sale of property and equipment and intangible assets Proceeds from sale of financial assets at fair value through other	3,769 438,795	1,515
comprehensive income		3,076 (502,073)
Purchase of financial assets at fair value through other comprehensive income Purchase of debt securities at amortised cost, net of allowances for expected credit losses	(182,375) (153,036)	(302,073)
Net cash inflow from sale of subsidiary	(133,030)	6,492
Investments to share capital of subsidiaries	(29,614)	0, 4 32
Dividends received from subsidiaries	12,375	40,958
Net cash inflow from investing activities	77,768	368,175

Statement of Cash Flows for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

	Notes	Year ended 31 December 2019	Year ended 31 December 2018
CASH FLOWS FROM FINANCING ACTIVITIES:			
Purchase of treasury shares		:=	(6)
Dividends paid		(126,709)	(69,381)
Redemption and repayment of debt securities issued	20	(82,261)	(62,342)
Repayment of lease liabilities		(1,304)	
Net cash outflow from financing activities		(210,274)	(131,729)
Effect of changes in foreign exchange rate on cash and cash			1
equivalents		(15,858)	170,292
Net change in cash and cash equivalents		(86,182)	481,712
CASH AND CASH EQUIVALENTS, beginning of the year	5	1,685,874	1,204,162
CASH AND CASH EQUIVALENTS, end of the year	5	1,599,692	1,685,874

During the years ended 31 December 2019 and 2018, there were non-cash transfers, which were excluded from the statement of cash flows and disclosed in Notes 16 and 24.

On behalf of the Management Board:

Umut B. Shavakhmetova Chairperson of the Board

6 March 2020 Almaty, Kazakhstan

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Pavel A. Meussov Chief Accountant

6 March 2020 Almaty, Kazakh

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Notes to the Separate Financial Statements for the Year Ended 31 December 2019

(Millions of Kazakhstani Tenge)

1. Principal activities

JSC Halyk Bank (the "Bank") provides retail and corporate banking services in the Republic of Kazakhstan. The primary state registration of the Bank with the authorities of justice of the Republic of Kazakhstan was made on 20 January 1994. The Bank operates under license No. 1.2.47/230/38/1 for carrying out banking and other operations and activities on the securities market, renewed by the National Bank of the Republic of Kazakhstan ("NBRK") on 8 November 2016. The Bank is a member of the obligatory deposit insurance system provided by the JSC Kazakhstan Deposit Insurance Fund.

The Bank's primary business includes originating loans and guarantees, attracting deposits, trading in securities and foreign currencies, executing transfers, cash and payment card operations and rendering other banking services to its customers. In addition, the Bank acts as the non-exclusive agent of the Government of the Republic of Kazakhstan in channelling various budgetary payments and pensions through its nationwide branch network.

The Bank has a primary listing with the Kazakhstan Stock Exchange ("KASE") and Astana International Exchange. The Bank's Global Depository Receipts ("GDRs") are primary listed on the London Stock Exchange and Astana International Exchange. In addition, the Bank's Eurobonds are primary listed on the London Stock Exchange and Luxembourg Stock Exchange.

The Bank is ultimately controlled by Timur Kulibayev and his wife Dinara Kulibayeva.

As at 31 December 2019, the Bank operated through its head office in Almaty and its 24 regional branches, 120 sub-regional offices and 482 cash settlement units (31 December 2018 – 23, 121 and 503, respectively) located throughout Kazakhstan. The address of the Bank's registered office is: 40 Al-Farabi Avenue, Almaty, A26M3K5, Kazakhstan.

As at 31 December 2019, the number of the Bank's full-time equivalent employees was 14,876 (31 December 2018 – 12,158).

The separate financial statements of the Bank for the year ended 31 December 2019 were authorised for issue by the Management Board on 6 March 2020.

Legal proceedings

From time to time and in the normal course of business, claims against the Bank are received from customers and counterparties. Management is of the opinion that no material unaccrued losses will be incurred and accordingly no provision has been made in these separate financial statements.

Operating environment

Emerging markets such as Kazakhstan are subject to different risks than more developed markets, including economic, political and social, and legal and legislative risks. Laws and regulations affecting businesses in Kazakhstan continue to change rapidly and tax and regulatory frameworks are subject to varying interpretations. The future economic direction of Kazakhstan is heavily influenced by the fiscal and monetary policies adopted by the government, together with developments in the legal, regulatory, and political environment.

Because Kazakhstan produces and exports large volumes of oil and gas, its economy is particularly sensitive to the price of oil and gas on the world market. Moreover, the state of the economy is significantly influenced by government spending on major infrastructure projects and various programs of the country's socio-economic development.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

During 2019, the average price of Brent crude oil was approximately 62.35 USD/bbl (66.73 USD/bbl in 2018). GDP growth in 2019 amounted to 4.5% (4.1% in 2018). The main drivers of the economy were construction, transport, trade and communications. At the same time, the manufacturing sector outstripped the mining industry in growth, showing growth of 4.4% versus 3.7%.

As at 31 December 2019, the base rate set by the NBRK was $9.25\% \pm 1\%$ ($9.25\% \pm 1\%$ as at 31 December 2018). The cost of funding decreased to 4.2% as at 31 December 2019 from 4.7% as at 31 December 2018, whereas the demand for new loans increased. Short-term notes of the NBRK remain the key instrument to withdraw excess KZT liquidity from the system.

Management of the Bank is monitoring developments in the current environment and taking measures it considers necessary in order to support the sustainability and development of the Bank's business in the foreseeable future. However, the impact of further economic developments on the future operations and financial position of the Bank is at this stage difficult to determine.

In the second half of 2019, the NBRK conducted an asset quality review (the "AQR") of the banking sector in Kazakhstan. The AQR verification perimeter included the 14 largest banks, which accounts for 87% share of total banking assets and 90% of the sector's loan portfolio. To ensure transparency and objectivity of the assessment, the NBRK conducted the AQR together with an international consultant and independent audit companies.

The AQR was carried out in accordance with the methodology of the European Central Bank, as well as in accordance with the requirements of the legislation of Kazakhstan in the field of accounting and prudential regulation.

According to the AQR results published by the NBRK, there is no equity deficit as at 1 April 2019 on the consolidated banking sector level (aggregation of the results of all participating banks in the AQR); prudential norms k1 and k2 are fulfilled with a margin at the system level, taking into account the AQR results. Based on the AQR results, participating banks were provided with reports containing comments/ recommendations for improving business processes, on the basis of which detailed action plans will be developed.

Taking into account that the Bank operates in accordance with requirements of Laws of the Republic of Kazakhstan and IFRS, individual AQR results for the Bank did not have a significant impact on the financial position and stability of the Group. Therefore, according to the NBRK, the adjustment on the Bank's assets and equity as at 1 April 2019 could comprise KZT 18.9 billion, which does not take into account changes in the market environment and changes in the Bank's portfolio that have occurred from the AQR date to 31 December 2019 (including repayment of loans, change in collateral, additional allowances for ECL, etc.).

As a result, the Bank does not expect that the AQR results will have an impact on the financial position and stability of the Bank in the future.

Ownership

As at 31 December 2019 and 2018, the Bank was owned by the following shareholders, which own individually more than 5% of the issued shares of the Bank:

	Total shares	Stake in total shares in circulation	Common shares	Stake in common shares in circulation
JSC HG Almex	7,583,538,228	64.5%	7,583,538,228	64.5%
Unified Accumulative Pension				
Fund Joint Stock Company	718,054,740	6.1%	718,054,740	6.1%
GDR holders	3,051,194,440	26.0%	3,051,194,440	26.0%
Other	401,261,989	3.4%	401,261,989	3.4%
Total shares in circulation	11,754,049,397	100.0%	11,754,049,397	100.0%

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

	Total shares	Stake in total shares in circulation	Common shares	Stake in common shares in circulation
JSC HG Almex	8,756,202,348	74.5%	8,756,202,348	74.5%
Unified Accumulative Pension				
Fund Joint Stock Company	718,054,740	6.1%	718,054,740	6.1%
GDR holders	1,846,541,120	15.7%	1,846,541,120	15.7%
Other	433,256,189	3.7%	433,256,189	3.7%
Total shares in circulation	11,754,054,397	100.0%	11,754,054,397	100.0%

2. Basis of presentation

Statement of compliance

These separate financial statements have been prepared in accordance with International Financial Reporting Standards ("IFRS").

These separate financial statements are the separate financial statements of the parent JSC Halyk Bank. The subsidiaries are not consolidated in these separate financial statements. Investments in subsidiaries were accounted for at cost, less impairment loss, if any. These separate financial statements should be read in conjunction with the consolidated financial statements of JSC Halyk Bank and its subsidiaries, which were authorized for the issue by Management Board of the Bank on 6 March 2020.

The consolidated financial statements are available at the head office of JSC Halyk Bank, registered at the following address: 40 Al-Farabi Avenue, Almaty, A26M3K5, Kazakhstan.

These separate financial statements have been prepared assuming that the Bank is a going concern, as the Bank have the resources to continue in operation for the foreseeable future. In making this assessment, the management have considered a wide range of information in relation to present and future economic conditions, including projections of cash flows, profit and capital resources.

These separate financial statements are presented in millions of Kazakhstani Tenge ("KZT" or "Tenge"), except for earnings per share amounts and unless otherwise indicated.

The separate financial statements have been prepared under the historical cost basis, except for certain financial instruments that are accounted for at fair value and certain property and equipment which are carried at revalued cost less depreciation and impairment as described in the accounting policies below.

Historical cost is generally based on the fair value of the consideration given in exchange for goods and services.

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date, regardless of whether that price is directly observable or estimated using another valuation technique. In estimating the fair value of an asset or a liability, the Bank takes into account the characteristics of the asset or liability if market participants would take those characteristics into account when pricing the asset or liability at the measurement date. Fair value for measurement and/or disclosure purposes in these separate financial statements is determined on such a basis, except for share-based payment transactions that are within the scope of IFRS 2, leasing transactions that are within the scope of IAS 17, and measurements that have some similarities to fair value but are not fair value, such as net realisable value in IAS 2 or value in use in IAS 36.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

In addition, for financial reporting purposes, fair value measurements are categorised into Level 1, 2 or 3 based on the degree to which the inputs to the fair value measurements are observable and the significance of the inputs to the fair value measurement in its entirety, which are described as follows:

- Level 1 inputs are quoted prices (unadjusted) in active markets for identical assets or liabilities that the Bank can access at the measurement date;
- Level 2 inputs are inputs, other than quoted prices included within Level 1, that are
 observable for the asset or liability, either directly or indirectly; and
- Level 3 inputs are unobservable inputs for the asset or liability.

The Bank presents its statement of financial position broadly in order of liquidity. An analysis regarding recovery or settlement within 12 months after the statement of financial position date (current) and more than 12 months after the statement of financial position date (non-current) is presented in Note 32.

Functional currency

Items included in the separate financial statements of the Bank are measured using the currency that best reflects the economic substance of the underlying events and circumstances relevant to that entity (the "functional currency"). The functional currency of the Bank is KZT. The presentation currency of the separate financial statements is KZT.

3. Significant accounting policies

Business combination under common control

A business combination involving business entities under common control is a business combination whereby all of the combining business entities are ultimately controlled by the same party or parties, both before and after the business combination, and that control is not transitory.

The effects of combinations of businesses under common control are accounted for by the Bank by the pooling of interests method, assuming that: assets and liabilities of the combining business entities are measured at their carrying values as disclosed in the Bank's financial statements, merger-related transaction costs are expensed in the statement of profit or loss, mutual balances are eliminated, any difference between the purchase price paid/transferred and the value of net assets acquired (at their carrying values disclosed in the separate financial statements) shall be recognized in equity of the acquirer.

Investments in subsidiaries

A subsidiary is an entity, including an unincorporated entity such as a partnership that is controlled by the Bank. Investments in subsidiaries are recorded in these separate financial statements at cost less impairment loss, if any.

Cash and cash equivalents

Cash and cash equivalents consist of cash on hand, unrestricted balances on correspondent accounts and amounts due from credit institutions and reverse repo agreements with original maturities within three months.

Obligatory reserves

Obligatory reserves represent funds in correspondent accounts with the NBRK and cash which are not available to finance the Bank's day to day operations and, hence, are not considered as part of cash and cash equivalents for the purpose of the cash flow statement.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Precious metals

Assets and liabilities denominated in precious metals are translated at the current rate computed based on the second fixing of the London Metal Exchange rates, using the KZT/USD exchange rate effective at the date. Changes in the bid prices are recorded in net foreign exchange gain/(loss).

Amounts due from credit institutions

In the normal course of business, the Bank maintains current accounts or deposits for various periods of time with other banks. Amounts due from credit institutions with a fixed maturity term are subsequently measured at amortized cost using the effective interest method. Those that do not have fixed maturities are carried at cost. Amounts due from credit institutions are carried net of any allowances for expected credit losses.

Recognition and measurement of financial instruments

The Bank recognizes financial assets and liabilities on its statement of financial position when it becomes a party to the contractual obligations of the instrument. Regular way purchases and sales of financial assets and liabilities are recognized using settlement date accounting. Where regular way purchases of financial instruments will be subsequently measured at fair value, the Bank accounts for any change in the fair value of the asset between trade date and settlement date in the same way it accounts for acquired instruments.

Financial assets and financial liabilities are initially measured at fair value. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities (other than financial assets and financial liabilities at fair value through profit or loss) are added to or deducted from the fair value of the financial assets or financial liabilities, as appropriate, on initial recognition. Transaction costs directly attributable to the acquisition of financial assets or financial liabilities at fair value through profit or loss are recognized immediately in profit or loss. The accounting policies for subsequent re-measurement of these items are disclosed in the respective accounting policies set out below.

Financial assets

All financial assets are recognized and derecognised on a trade date where the purchase or sale of a financial asset is under a contract whose terms require delivery of the financial asset within the timeframe established by the market concerned, and are initially measured at fair value, plus transaction costs, except for those financial assets classified as at FVTPL. Transaction costs directly attributable to the acquisition of financial assets classified as at FVTPL are recognized immediately in profit or loss.

All recognized financial assets that are within the scope of IFRS 9 *Financial Instruments* ("IFRS 9") are required to be subsequently measured at amortized cost or fair value on the basis of the entity's business model for managing the financial assets and the contractual cash flow characteristics of the financial assets.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Specifically:

- Retention of an asset to obtain the cash flows stipulated by the contract. This business model suggests financial asset management aims to realize cash flows by receiving principal and interest payments over the life of the financial instrument. Within the framework of this business model, holding a financial asset to maturity is a priority, but early disposal is not prohibited.
- Retention of an asset with a view for obtaining contractual cash flows and sale of financial assets. This business model assumes that the management of financial assets is aimed at both obtaining contractual cash flows and sale of financial assets. Within the framework of this business model, the receipt of cash from the sale of a financial asset is a priority, which is characterized by a greater frequency and volume of sales compared to "holding an asset to receive contractual cash flows" business model.
- Retention of an asset for other purposes. Within the framework of this business model, financial assets can be managed with the following purposes:
 - management with a view to selling cash flows through the sale of financial assets:
 - liquidity management to meet daily funding needs;
 - a portfolio, which management and performance is measured on a fair value basis;
 - a portfolio, which matches the definition of held for trading. Financial assets are deemed to be held for trading if they were acquired mainly with a view to subsequent disposal in the near future (up to 180 days), gaining short-term profit, or represent derivative financial instruments (except for a financial guarantee or derivative financial instrument that was designated as a hedging instrument).

In accordance with IFRS 9, financial assets are classified as follows:

- bank loans classified as assets at amortised cost are contained within the framework of a
 business model which aims to receive cash flows exclusively for repayment of unpaid
 interest and principal stipulated by loan agreement and that have contractual cash flows that
 are solely payments of principal and interest ("SPPI") on the principal amount outstanding;
- balances on correspondent accounts, interbank loans/deposits, repo transactions are classified, as a rule, as assets, estimated at amortised cost, since they are managed within the framework of a business model, which aims to receive cash flows stipulated by the contract, and that have contractual cash flows that are SPPI;
- debt securities may be classified into any of the three classification categories, taking into account the selected business model and compliance with the SPPI criterion:
- equity securities are generally classified as instruments at fair value through profit or loss;
- trading securities and derivatives are classified as financial assets at fair value through profit or loss.

Financial assets or financial liabilities at fair value through profit or loss

Financial assets at FVTPL are:

- Assets with contractual cash flows that are not SPPI; or/and
- Assets that are held in a business model other than held to collect contractual cash flows or held to collect and sell; or
- Assets designated at FVTPL using the fair value option.

Financial liabilities are classified as at fair value through profit or loss where the financial liability is either held for trading or it is designated as at fair value through profit or loss.

A financial liability is classified as held for trading if:

- it has been acquired principally for the purpose of selling in the near term; or
- it is a part of an identified portfolio of financial instruments that the Bank manages together and has a recent actual pattern of short-term profit-taking; or
- it is a derivative that is not designated and effective as a hedging instrument.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

A financial liability other than a financial liability held for trading, may be designated as at fair value through profit or loss upon initial recognition if:

- such designation eliminates or significantly reduces a measurement or recognition inconsistency that would otherwise arise; or
- the financial liability forms part of a group of financial liabilities, which is managed and its
 performance is evaluated on a fair value basis, in accordance with the Bank's documented
 risk management or investment strategy, and information about the grouping is provided
 internally on that basis; or
- it forms part of a contract containing one or more embedded derivatives, and IFRS 9 permits the entire combined contract (asset or liability) to be designated as at fair value through profit or loss.

Financial assets and financial liabilities at fair value through profit or loss are recorded in the statement of financial position at fair value. Changes in fair value are recorded in net (loss)/gain on financial assets and liabilities at fair value through profit or loss. Interest earned or incurred is accrued in interest income or expense, respectively, according to the terms of the contract, while dividend income is recorded in "Other income" when the right to receive the payment has been established.

Debt instruments at amortised cost or at fair value through other comprehensive income ("FVTOCI")

The Bank assesses the classification and measurement of a financial asset based on the contractual cash flow characteristics of the asset and the Bank's business model for managing the asset.

For an asset to be classified and measured at amortised cost or at FVTOCI, its contractual terms should give rise to cash flows that are solely payments of principal and interest on the principal outstanding.

For the purpose of SPPI test, principal is the fair value of the financial asset at initial recognition. That principal amount may change over the life of the financial asset (e.g. if there are repayments of principal). Interest consists of consideration for the time value of money, for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs, as well as a profit margin. The SPPI assessment is made in the currency in which the financial asset is denominated.

Contractual cash flows that are SPPI are consistent with a basic lending arrangement. Contractual terms that introduce exposure to risks or volatility in the contractual cash flows that are unrelated to a basic lending arrangement, such as exposure to changes in equity prices or commodity prices, do not give rise to contractual cash flows that are SPPI. An originated or an acquired financial asset can be a basic lending arrangement irrespective of whether it is a loan in its legal form.

An assessment of business models for managing financial assets is performed at the date of initial application of IFRS 9 to determine the classification of a financial asset. The business model is applied retrospectively to all financial assets existing at the date of initial application of IFRS 9. The Bank determines the business models at a level that reflects how groups of financial assets are managed together to achieve a particular business objective. The Bank's business model does not depend on management's intentions for an individual instrument; therefore, the business model assessment is performed at a higher level of aggregation rather than on an instrument-by-instrument basis.

The Bank has more than one business model for managing its financial instruments that reflect how the Bank manages its financial assets in order to generate cash flows. The Bank's business models determine whether cash flows will result from collecting contractual cash flows, selling financial assets or both.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

The Bank considers all relevant information available when making the business model assessment. However, this assessment is not performed based on scenarios that the Bank does not reasonably expect to occur, such as so-called 'worst case' or 'stress case' scenarios. The Bank takes into account all relevant evidence available such as:

- How the performance of the business model and the financial assets held within that business model are evaluated and reported to the entity's key management personnel:
- The risks that affect the performance of the business model (and the financial assets held within that business model) and, in particular, the way in which those risks are managed; and
- How managers of the business are compensated (e.g. whether the compensation is based on the fair value of the assets managed or on the contractual cash flows collected).

At initial recognition of a financial asset, the Bank determines whether newly recognized financial assets are part of an existing business model or whether they reflect the commencement of a new business model. The Bank reassess its business models each reporting period to determine whether the business models have changed since the preceding period. For the current reporting period, the Bank has not identified a change in its business models.

When a debt instrument measured at FVTOCI is derecognized, the cumulative gain/loss previously recognized in OCI is reclassified from equity to profit or loss. In contrast, for an equity investment designated as measured at FVTOCI, the cumulative gain/loss previously recognized in OCI is not subsequently reclassified to profit or loss but transferred within equity. Debt instruments that are subsequently measured at amortized cost or at FVTOCI are subject to impairment.

Collateral

The Bank obtains collateral in respect of customer liabilities where this is considered appropriate. The collateral normally takes the form of a lien over the customer's assets and gives the Bank a claim on these assets for both existing and future customer liabilities.

Reclassification of financial assets

If the business model under which the Bank holds financial assets changes, the financial assets affected are reclassified. The classification and measurement requirements related to the new category apply prospectively from the first day of the first reporting period following the change in business model that result in reclassifying the Bank's financial assets. Changes in contractual cash flows are considered under the accounting policy on *Modification and derecognition of financial assets* described below.

Modification and derecognition of financial assets

A modification of a financial asset occurs when the contractual terms governing the cash flows of a financial asset are renegotiated or otherwise modified between initial recognition and maturity of the financial asset. A modification affects the amount and/or timing of the contractual cash flows either immediately or at a future date. In addition, the introduction or adjustment of existing covenants of an existing loan would constitute a modification even if these new or adjusted covenants do not yet affect the cash flows immediately but may affect the cash flows depending on whether the covenant is or is not met (e.g. a change to the increase in the interest rate that arises when covenants are breached).

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Where possible, the Bank seeks to restructure loans rather than to take possession of collateral. This may involve extending the payment arrangements and the agreement of new loan conditions. Once the terms have been renegotiated, the loan is no longer considered past due. Management continuously monitors renegotiated loans to ensure that they are performing and that future payments are likely to occur. The loans continue to be subject to an individual or collective impairment assessment, calculated using the loan's original effective interest rate ("EIR"). Renegotiated terms are evidence of impairment for loans assessed for impairment on an individual basis, for which deterioration of the financial position is observed.

The Bank renegotiates loans to customers in financial difficulty to maximize collection and minimize the risk of default. A loan forbearance is granted in cases where although the borrower made all reasonable efforts to pay under the original contractual terms, there is a high risk of default or default has already happened and the borrower is expected to be able to meet the revised terms. The revised terms in most of the cases include an extension of the maturity of the loan, changes to the timing of the cash flows of the loan (principal and interest repayment), reduction in the amount of cash flows due (principal and interest forgiveness) and amendments to covenants. The Bank has an established forbearance policy, which applies for corporate and retail lending.

When a financial asset is modified the Bank assesses whether this modification results in derecognition. In accordance with the Banks's policy a modification results in derecognition when it gives rise to substantially different terms. To determine if the modified terms are substantially different from the original contractual terms the Bank considers qualitative factors, such as contractual cash flows after modification are no longer SPPI, change in currency or change of counterparty, the extent of change in interest rates, maturity, covenants.

When a financial asset is modified due to commercial reasons, the Bank considers various qualitative factors (change in currency, interest rate, maturity) and on that basis concludes whether old loan should be derecognised and new loan should be recognised at fair value.

In the case where the financial asset is derecognised the loss allowance for ECL is remeasured at the date of derecognition to determine the net carrying amount of the asset at that date. The difference between this revised carrying amount and the fair value of the new financial asset with the new terms will lead to a gain or loss on derecognition. The new financial asset will have a loss allowance measured based on 12-month ECL except in the rare occasions where the new loan is considered to be originated credit-impaired asset. This applies only in the case where the fair value of the new loan is recognized at a significant discount to its revised par amount because there remains a high risk of default, which has not been reduced by the modification.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Impairment

Calculation of financial assets impairment is carried out taking into account the following factors:

- In order to calculate the ECL, the Bank performs a loan assessment on an individual basis and on a group basis depending on general credit risk features.
- ECLs are a probability-weighted estimate of the present value of credit losses. These are measured as the present value of the difference between the cash flows due to the Bank under the contract and the cash flows that the Bank expects to receive arising from the weighting of multiple future economic scenarios, discounted at the asset's EIR.
- Calculations are based on justified and verified information, which may be received without any significant costs or efforts. Calculation of the present value of the expected future cash flows of the secured financial asset reflects the cash flow that may result from foreclosure, less the cost of obtaining and selling collateral, regardless of whether the recovery is probable or not. The allowance is based on the Bank's own experience in assessing losses and management assumptions about the level of losses likely to be recognised on assets in each category of a credit risk, based on debt servicing capabilities and borrower's credit track record.
- Impairment for treasury operations (investments in debt securities, reverse repurchase transactions, interbank loans and deposits, correspondent account transactions, accounts receivable under treasury transactions) is calculated taking into account the counterparty's rating, probability of default, duration of a transaction and the extent of loss in case of a default.
- The estimated credit losses for treasury operations are estimated on an individual basis (except for individual claims in the form of receivables).

Financial assets are segmented by stages in accordance with the following approach:

- Stage 1: There is no significant increase in credit risk since recognition of an asset, impairment is recognised as expected losses over the next 12 months;
- Stage 2: Significant increase in credit risk since recognition of an asset, impairment is recognised as expected losses over the life of a financial asset;
- Stage 3: Financial asset is in default or has signs of impairment.

Allowances for expected credit losses

ECLs are required to be measured through a loss allowance at an amount equal to:

- 12-month ECL, i.e. lifetime ECL that result from those default events on the financial instrument that are possible within 12 months after the reporting date, (referred to as Stage 1); or
- Full lifetime ECL, i.e. lifetime ECL that result from all possible default events over the life of the financial instrument, (referred to as Stage 2 and Stage 3).

For more details about staging refer to Note 21.

A loss allowance for full lifetime ECL is required for a financial instrument if the credit risk on that financial instrument has increased significantly since initial recognition. For all other financial instruments, ECLs are measured at an amount equal to the 12-month ECL.

- For undrawn loan commitments, the ECL is the difference between the present value of the difference between the contractual cash flows that are due to the Bank if the holder of the commitment draws down the loan and the cash flows that the Bank expects to receive if the loan is drawn down; and
- For financial guarantee contracts, the ECL is the difference between the expected payments to reimburse the holder of the guaranteed debt instrument less any amounts that the Bank expects to receive from the holder, the debtor or any other party.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

The Bank measures ECL on an individual basis, or on a collective basis for portfolios of loans that share similar risk characteristics. The measurement of the loss allowance is based on the present value of the asset's expected cash flows using the asset's original EIR, regardless of whether it is measured on an individual basis or a collective basis.

Critical to the determination of ECL is the definition of default. The definition of default is used in measuring the amount of ECL and in the determination of whether the loss allowance is based on 12-month or lifetime ECL, as default is a component of the probability of default (PD) which affects both the measurement of ECLs and the identification of a significant increase in credit risk (Please also refer to Note 4).

For the details of supportable forward-looking information, please refer to Note 32 for more details.

Repurchase and reverse repurchase agreements and securities lending

The Bank enters into financial assets sale and purchase back agreements ("repos") and financial assets purchase and sale back agreements ("reverse repos") in the normal course of its business. Repos and reverse repos are utilized by the Bank as an element of its treasury management.

Repos are treated as secured financing transactions. Securities sold under repos are retained in the separate statement of financial position and, in case the transferee has the right, by contract or custom, to sell or repledge them, reclassified as securities pledged under sale and repurchase agreements. The corresponding liability is presented within amounts due to credit institutions.

Securities purchased under reverse repos are recorded as amounts due from credit institutions, amounts due customers or cash and cash equivalents as appropriate. The difference between the sale and repurchase prices is treated as interest and accrued over the life of the repo agreements using the effective interest method.

Securities lent to counterparties are retained in the statement of financial position. Securities borrowed are not recorded in the statement of financial position, unless these are sold to third parties, in which case the purchase and sale are recorded within net gain/(loss) on financial assets and liabilities at fair value through profit or loss in the statement of profit or loss. The obligation to return securities borrowed is recorded at fair value as a trading liability. The Bank enters into securities repurchase agreements and securities lending transactions under which it receives or transfers collateral in accordance with normal market practice. Under standard terms for repurchase transactions in Kazakhstan and other Commonwealth of Independent States ("CIS"), the recipient of collateral has the right to sell or repledge the collateral, subject to returning equivalent securities on settlement of the transaction.

Offsetting

Financial assets and liabilities are offset and the net amount is reported in the statement of financial position when there is a legally enforceable right to set off the recognised amounts and there is an intention to settle on a net basis, or to realise the asset and settle the liability simultaneously. In accounting for a transfer of a financial asset that does not qualify for derecognition, the Bank does not offset the transferred asset and the associated liability. Income and expense is not offset in the statement of profit or loss unless required or permitted by any accounting standard or interpretation, and as specifically disclosed in the accounting policies of the Bank.

Derivative financial instruments

The Bank enters into a variety of derivative financial instruments some of which are held for trading while others are held to manage its exposure to interest rate risk; credit risk; and foreign exchange rate risk. Derivative held include foreign exchange forward contracts, interest rate swaps, cross currency interest rate swaps and credit default swaps.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Derivatives are initially recognized at fair value at the date a derivative contract is entered into and are subsequently remeasured to their fair value at each balance sheet date. The resulting gain/loss is recognized in profit or loss immediately.

A derivative with a positive fair value is recognized as a financial asset whereas a derivative with a negative fair value is recognized as a financial liability. A derivative is presented as a non-current asset or a non-current liability if the remaining maturity of the instrument is more than 12 months and it is not expected to be realized or settled within 12 months. Other derivatives are presented as current assets or current liabilities.

Derivatives embedded in financial liabilities or other non-financial asset host contracts are treated as separate derivatives when their risks and characteristics are not closely related to those of the host contracts and the host contracts are not measured at FVTPL.

An embedded derivative is presented as a non-current asset or a non-current liability if the remaining maturity of the hybrid instrument to which the embedded derivative relates is more than 12 months and is not expected to be realized or settled within 12 months. Other embedded derivatives are presented as current assets or current liabilities.

Forwards

Forward and futures contracts are contractual agreements to buy or sell a specified financial instrument at a specific price and date in the future. Forwards are customised contracts transacted in the over-the-counter market. Futures contracts are transacted in standardised amounts on regulated exchanges and are subject to daily cash margin requirements. The main differences in the risk associated with forward and futures contracts are credit risk and liquidity risk.

The Bank has credit exposure to the counterparties of forward contracts. The credit risk related to future contracts is considered minimal because the cash margin requirements of the exchange help ensure that these contracts are always honored. Forward contracts are settled gross and are, therefore, considered to bear a higher liquidity risk than the futures contracts that are settled on a net basis. Both types of contracts result in market risk exposure.

Swaps

Swaps are contractual agreements between two parties to exchange streams of payments over time based on specified notional amounts, in relation to movements in a specified underlying index such as an interest rate, foreign currency rate or equity index.

Interest rate swaps relate to contracts taken out by the Bank with other financial institutions in which the bank either receives or pays a floating rate of interest in return for paying or receiving, respectively, a fixed rate of interest. The payment flows are usually netted against each other, with the difference being paid by one party to the other.

In a currency swap, the Bank pays a specified amount in one currency and receives a specified amount in another currency. Currency swaps are mostly gross-settled.

Credit default swaps are contractual agreements between two parties to make payments with respect to defined credit events, based on specified notional amounts. The Bank purchases credit default swaps from monoline insurers and banks in order to mitigate the risk of default by the counterparty on the underlying security referenced by the swap.

Options

Options are contractual agreements that convey the right, but not the obligation, for the purchaser either to buy or sell a specific amount of a financial instrument at a fixed price, either at a fixed future date or at any time within a specified period. The Bank purchases and sells options through regulated exchanges and in the over-the-counter markets.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Options purchased by the Bank provide the Bank with the opportunity to purchase (call options) or sell (put options) the underlying asset at an agreed-upon value either on or before the expiration of the option. The Bank is exposed to credit risk on purchased options only to the extent of their carrying amount, which is their fair value.

Options written by the Bank provide the purchaser the opportunity to purchase from or sell to the bank the underlying asset at an agreed-upon value either on or before the expiration of the option.

The Bank enters into a variety of derivative financial instruments to manage its exposure to interest rate and foreign exchange rate risk, including foreign exchange forward contracts, interest rate swaps and cross currency swaps. Further details of derivative financial instruments are disclosed in Note 7.

The Bank's exposure under derivative contracts is closely monitored as part of the overall management of the Bank's market, credit, and liquidity risks (Note 32).

Credit-impaired financial assets

A financial asset is 'credit-impaired' when one or more events that have a detrimental impact on the estimated future cash flows of the financial asset have occurred. Credit-impaired financial assets are referred to as Stage 3 assets. Evidence of credit-impairment includes observable data about the following events:

- Significant financial difficulty of the borrower or issuer;
- A breach of contract such as a default or past due event;
- The lender of the borrower, for economic or contractual reasons relating to the borrower's financial difficulty, having granted to the borrower a concession that the lender would not otherwise consider;
- The disappearance of an active market for a security because of financial difficulties; or
- The purchase of a financial asset at a deep discount that reflects the incurred credit losses.

It may not be possible to identify a single discrete event instead; the combined effect of several events may have caused financial assets to become credit-impaired. The Bank assesses whether debt instruments that are financial assets measured at amortized cost or FVTOCI are credit-impaired at each reporting date. To assess if sovereign and corporate debt instruments are credit impaired, the Bank considers factors such as bond yields, credit ratings and the ability of the borrower to raise funding.

A loan is considered credit-impaired when a concession is granted to the borrower due to a deterioration in the borrower's financial condition, unless there is evidence that as a result of granting the concession the risk of not receiving the contractual cash flows has reduced significantly and there are no other indicators of impairment. For financial assets where concessions are contemplated but not granted, the asset is deemed credit impaired when there is observable evidence of credit-impairment including meeting the definition of default. The definition of default includes unlikeliness to pay indicators and a backstop if amounts are overdue for 90 days or more. The decision to use cross-default is based on case-by-case assessment of borrower and facility conditions such as collateral and materiality of exposure.

Purchased or originated credit-impaired ("POCI") financial assets.

POCI financial assets are treated differently because the asset is credit-impaired at initial recognition. For these assets, the Bank recognizes all changes in lifetime ECL since initial recognition as a loss allowance with any changes recognized in profit or loss. A favorable change for such assets creates an impairment gain (recovery of credit loss expense).

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Write off

Loans and debt securities are written off when the Bank has no reasonable expectations of recovering the financial asset (either in its entirety or in a portion of it). This is the case when the Bank determines that the borrower does not have assets or sources of income that could generate sufficient cash flows to repay the amounts subject to the write-off. A write-off constitutes a derecognition event. The Bank may apply enforcement activities to financial assets written off. Recoveries resulting from the Bank's enforcement activities will result in impairment gains. Where loans are secured, they are generally written off after receipt of any proceeds from the sale of collateral. When such net realizable value of collateral has been determined and no reasonable expectation of further recovery, write off may be earlier.

Derecognition of financial assets and liabilities

Financial assets

A financial asset (or, where applicable a part of a financial asset or part of a group of similar financial assets) is derecognised where:

- the rights to receive cash flows from the asset have expired:
- the Bank has transferred its rights to receive cash flows from the asset, or retained the right to receive cash flows from the asset, but has assumed an obligation to pay them in full without material delay to a third party under a 'pass-through' arrangement; and
- the Bank either (a) has transferred substantially all the risks and rewards of the asset, or
 (b) has neither transferred nor retained substantially all the risks and rewards of the asset,
 but has transferred control of the asset.

A financial asset is derecognised when it has been transferred and the transfer qualifies for derecognition. A transfer requires that the Bank either: (a) transfers the contractual rights to receive the asset's cash flows; or (b) retains the right to the asset's cash flows but assumes a contractual obligation to pay those cash flows to a third party. After a transfer, the Bank reassesses the extent to which it has retained the risks and rewards of ownership of the transferred asset. If substantially all the risks and rewards have been retained, the asset remains on the statement of financial position. If substantially all of the risks and rewards have been transferred, the asset is derecognized. If substantially all the risks and rewards have been neither retained nor transferred, the Bank assesses whether or not is has retained control of the asset. If it has not retained control, the asset is derecognized. Where the Bank has retained control of the asset, it continues to recognize the asset to the extent of its continuing involvement.

Modification and derecognition of financial liabilities

The Bank derecognizes financial liabilities when, and only when, the Bank's obligations are discharged, cancelled or have expired. The difference between the carrying amount of the financial liability derecognized and the consideration paid and payable is recognized in profit or loss.

When the Bank exchanges with the existing lender one debt instrument into another one with substantially different terms, such exchange is accounted for as an extinguishment of the original financial liability and the recognition of a new financial liability. Similarly, the Bank accounts for substantial modification of terms of an existing liability or part of it as an extinguishment of the original financial liability and the recognition of a new liability. It is assumed that the terms are substantially different if the discounted present value of the cash flows under the new terms, including any fees paid net of any fees received and discounted using the original effective rate is at least 10 per cent different from the discounted present value of the remaining cash flows of the original financial liability. If the modification is not substantial, the difference between: (1) the carrying amount of the liability before the modification; and (2) the present value of the cash flows after modification should be recognised in profit or loss as the modification gain or loss within other gains and losses.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Taxation

The current income tax expense is calculated in accordance with the regulations of the Republic of Kazakhstan.

Deferred tax assets and liabilities are calculated in respect of temporary differences using the balance sheet liability method. Deferred income taxes are provided for all temporary differences arising between the tax bases of assets and liabilities and their carrying values for financial reporting purposes, except where the deferred income tax arises from the initial recognition of goodwill or of an asset or liability in a transaction that is not a business combination and, at the time of the transaction, affects neither the accounting profit nor taxable profit or loss.

A deferred tax asset is recorded only to the extent that it is probable that taxable profit will be available against which the deductible temporary differences can be utilized. The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered. Deferred tax assets and liabilities are measured at tax rates that are expected to apply to the period when the asset is realized or the liability is settled, based on tax rates that have been enacted or substantively enacted at the reporting date. Deferred tax is charged or credited to profit or loss, except when it relates to items charged or credited directly to other comprehensive income or equity, in which case the deferred tax is also charged or credited directly to other comprehensive income or equity.

Deferred income tax is provided on temporary differences arising on investments in subsidiaries, associates and joint ventures, except where the timing of the reversal of the temporary difference can be controlled and it is probable that the temporary difference will not reverse in the foreseeable future.

Deferred tax assets and deferred tax liabilities are offset and reported net in the statement of financial position if:

- The Bank has a legally enforceable right to offset current income tax assets against current income tax liabilities; and
- Deferred income tax assets and the deferred income tax liabilities relate to income taxes levied by the same taxation authority on the same taxable entity.

Kazakhstan has various operating taxes that are assessed on the Bank's activities. These taxes are recorded as taxes other than income tax.

The Bank records a provision for uncertain tax positions if it is probable that the Bank will have to make a payment to tax authorities upon their examination of a tax position. This provision is measured at the Bank's best estimate of the amount expected to be paid. Provisions are reversed to income in provision for (recovery of) income taxes in the period in which management determines they are no longer required or as determined by statute.

Property and equipment

Property and equipment are carried at cost less accumulated depreciation and any accumulated impairment except for the buildings and construction which are carried at revalued amount, being its fair value at the date of the revaluation less any subsequent accumulated depreciation and subsequent accumulated impairment losses.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Depreciation of an asset begins when it is available for use. Depreciation is calculated on a straight-line basis over the following estimated useful lives:

	Years
Buildings and construction	20-100
Vehicles	5-7
Computers and banking equipment	5-10
Other	7-10

Leasehold improvements are amortized over the life of the related leased asset. Expenses related to repairs and renewals are charged when incurred and included in operating expenses unless they qualify for capitalization.

The carrying amounts of property and equipment are reviewed at each reporting date to assess whether they are recorded in excess of their recoverable amounts, and where carrying values exceed this estimated recoverable amount, assets are written down to their recoverable amount. An impairment loss is recognized in the respective period and is included in operating expenses.

Buildings and construction held for use in supply of services, or for administrative purposes, are stated in the statement of financial position at their revalued amounts, being the fair value at the date of revaluation, determined from market-based evidence by appraisal undertaken by professional independent appraisers, less any subsequent accumulated depreciation and subsequent accumulated impairment losses. Revaluations are performed with sufficient regularity such that the carrying amount does not differ materially from that which would be determined using fair values at the reporting date.

Any revaluation increase arising on the revaluation of such buildings and construction is credited to the property and equipment revaluation reserve, except to the extent that it reverses a revaluation decrease for the same asset previously recognized as an expense, in which case the increase is credited to the statement of profit or loss to the extent of the decrease previously charged. A decrease in carrying amount arising on the revaluation of such buildings and construction is charged as an expense to the extent that it exceeds the balance, if any, held in the property and equipment revaluation reserve relating to a previous revaluation of that asset.

Depreciation on revalued buildings and construction is charged to the statement of profit or loss. On the subsequent sale or retirement of a revalued property, the attributable revaluation surplus remaining in the property and equipment revaluation reserve is transferred directly to retained earnings.

Construction in progress is carried at cost, less any recognised impairment loss. Cost includes professional fees and, for qualifying assets, borrowing costs capitalised in accordance with the Bank's accounting policy. Such construction in progress is classified to the appropriate categories of property and equipment when completed and ready for intended use. Depreciation of these assets, on the same basis as other property assets, commences when the assets are ready for their intended use.

An item of property and equipment is derecognised upon disposal or when no future economic benefits are expected to arise from the continued use of the asset. Any gain or loss arising on the disposal or retirement of an item of property and equipment is determined as the difference between the sales proceeds and the carrying amount of the asset and is recognised in profit or loss.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Intangible assets

Intangible assets with finite useful lives that are acquired separately are carried at cost less accumulated amortisation and accumulated impairment losses. The estimated useful life and amortisation method are reviewed at the end of each reporting period, with the effect of any changes in estimate being accounted for on a prospective basis. An intangible asset is derecognised on disposal, or when no future economic benefits are expected from use or disposal. Gains or losses arising from derecognition of an intangible asset, measured as the difference between the net disposal proceeds and the carrying amount of the asset, are recognised in profit or loss when the asset is derecognised.

Intangible assets with indefinite useful lives that are acquired separately are carried at cost less accumulated impairment losses. Intangible assets with indefinite useful lives are not subject to amortization.

Amortisation is recognised on a straight-line basis over their estimated useful lives:

	Years
Software	10
Licensing agreements for the right to use the	
software	10
Other	10

Assets held for sale

A non-current asset and the liability directly associated with non-current assets are classified as held for sale ("disposal group") if it is highly probable that the net asset's carrying amount will be recovered through a sale transaction rather than through continuing use and the asset (or disposal group) is available for immediate sale in its present condition. Management must be committed to the sale, which should be expected to qualify for recognition as a completed sale within one year from the date of classification of an asset as held for sale.

Assets held for sale are measured at the lower of their carrying amount and fair value less costs to sell. If the fair value less costs to sell of an asset held for sale is lower than its carrying amount, an impairment loss is recognized in the statement of profit or loss as loss of assets held for sale. Any subsequent increase in an asset's fair value less costs to sell is recognized to the extent of the cumulative impairment loss that was previously recognized in relation to that specific asset.

Amounts due to customers and credit institutions

Amounts due to customers and credit institutions are initially recognized at the fair value of the consideration received less directly attributable transaction costs. Subsequently, amounts due are stated at amortized cost and any difference between net proceeds and the redemption value is recognized in the statement of profit or loss over the period of the borrowings using the effective interest 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 the liability and the consideration paid is recognized in the statement of profit or loss.

Debt securities issued

Debt securities issued represent bonds issued by the Bank, which are accounted for according to the same principles used for amounts due to customers and credit institutions. Any difference between proceeds received, net of debt issuance costs, and the redemption value is recognized in the statement of profit or loss over the period of the borrowings using the effective interest method.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Provisions

Provisions are recognised when the Bank has a present obligation (legal or constructive) as a result of a past event, it is probable that the Bank will be required to settle the obligation, and a reliable estimate can be made of the amount of the obligation.

The amount recognised as a provision is the best estimate of the consideration required to settle the present obligation at the end of the reporting period, taking into account the risks and uncertainties surrounding the obligation. When a provision is measured using the cash flows estimated to settle the present obligation, its carrying amount is the present value of those cash flows (when the effect of the time value of money is material).

When some or all of the economic benefits required to settle a provision are expected to be recovered from a third party, a receivable is recognised as an asset if it is virtually certain that reimbursement will be received and the amount of the receivable can be measured reliably.

Retirement and other benefit obligations

The Bank does not have any pension arrangements other than the state pension system of Kazakhstan, which requires current withholdings by the employer calculated as a percentage from current gross salary payments; such expense is charged in the period the related salaries are earned and included in operating expenses in the statement of profit or loss. The Bank contributes social tax to the budget of Kazakhstan and other countries where the Bank operates for its employees. In addition, the Bank has no post-retirement benefits.

Equity

The Bank classifies a financial instrument that it issues as a financial asset, financial liability or an equity instrument in accordance with the substance of the contractual arrangement. An instrument is classified as a liability if it is a contractual obligation to deliver cash or another financial asset, or to exchange financial assets or financial liabilities on potentially unfavourable terms. An instrument is classified as equity if it evidences a residual interest in the assets of the Bank after the deduction of liabilities.

The components of a compound financial instrument issued by the Bank are classified and accounted for separately as financial assets, financial liabilities or equity as appropriate.

Share capital

External costs directly attributable to the issue of new shares, other than in a business combination, are shown as a deduction from the proceeds in equity. Prior to 13 May 2003, any excess of the fair value of consideration received over the nominal value of shares issued was recognized as share premium reserve. Effective 13 May 2003, upon a change in the law concerning "Joint Stock Companies", the nominal amount concept was restricted to placement of shares only between the founders of an entity. For all other investors, share capital is recorded at placement value being the consideration received by an entity for its shares.

Treasury shares

When the Bank acquires its own share capital, the amount of the consideration paid, including directly attributable costs, net of any related tax benefit, is recognised as a change in equity. Shares repurchased by the Bank are cancelled. Repurchased shares are classified as treasury shares and are held at cost. These shares are treated as a deduction from the issued and weighted average number of shares, and the cost price of the shares is presented as a deduction from total equity.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Dividends

Dividends are recognized as a liability and deducted from equity on the date they are declared. Dividends are disclosed when they are proposed before the reporting date or proposed or declared after the reporting date but before the separate financial statements are authorized for issue.

Equity reserves

The reserves recorded in equity (other comprehensive income) on the Bank's statement of financial position include:

- Revaluation reserve of financial assets at fair value through other comprehensive income
 which comprises changes in fair value of financial assets at fair value through other
 comprehensive income and allowances for expected credit losses on debt financial assets at
 fair value through other comprehensive income;
- Cumulative translation reserve which is used to record foreign exchange differences arising from the translation of the net investment in foreign operations;
- Property revaluation reserve which comprises revaluation reserve of land and buildings.

Contingencies

Contingent liabilities are not recognized in the statement of financial position but are disclosed in separate financial statements, unless the possibility of any outflow in settlement is remote. A contingent asset is not recognized in the statement of financial position but disclosed in separate financial statements, when an inflow of economic benefits is probable.

Recognition of income and expense

Interest income and expense for all financial instruments, except for financial assets measured or designated at fair value through profit or loss are recognized in 'Net interest income' as 'Interest income calculated using the effective interest method' and 'Interest expense' in the profit or loss account using the effective interest method.

The EIR is the rate that exactly discounts estimated future cash flows of the financial instrument through the expected life of the financial instrument or, where appropriate, a shorter period, to the net carrying amount of the financial asset or financial liability. The future cash flows are estimated taking into account all the contractual terms of the instrument.

The calculation of the EIR includes all fees and points paid or received between parties to the contract that are incremental and directly attributable to the specific lending arrangement, transaction costs, and all other premiums or discounts. For financial assets at FVTPL transaction costs are recognized in profit or loss at initial recognition.

The interest income/ interest expense is calculated by applying the EIR to the gross carrying amount of non-credit impaired financial assets (i.e. at the amortised cost of the financial asset before adjusting for any expected credit loss allowance), or to the amortized cost of financial liabilities. For credit-impaired financial assets, the interest income is calculated by applying the EIR to the amortised cost of the credit-impaired financial assets (i.e. the gross carrying amount less the allowance for expected credit losses). For financial assets POCI the EIR reflects the expected credit losses in determining the future cash flows expected to be received from the financial asset.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Loan origination fees for loans issued to customers are (together with related direct costs) recognised as an adjustment to the effective yield of the loans. Where it is probable that a loan commitment will lead to a specific lending arrangement, the loan commitment fees are deferred, together with the related direct costs, and recognised as an adjustment to the EIR of the resulting loan. Where it is unlikely that a loan commitment will lead to a specific lending arrangement, the loan commitment fees are recognised in profit or loss over the remaining period of the loan commitment. Where a loan commitment expires without resulting in a loan, the loan commitment fee is recognised in profit or loss on expiry.

Fee and commission income

Fee and commission income is recognised to reflect the transfer of services to customers at an amount that reflects the consideration that is expected to be received in exchange for such services. The Bank identifies the performance obligation, i.e. the services agreed with the customer, and the consideration, and recognises income in line with the transfer of services, the performance obligation, agreed with the customer.

For each performance obligation identified, the Bank determines at contract inception whether it satisfies the performance obligation over time or at a point in time, and whether the consideration is fixed or variable, including whether consideration is constrained by, for instance, external factors outside the Bank's influence. The consideration is subsequently allocated to the identified performance obligation.

Fee and commission income from maintenance of customer accounts and cash operations include fees earned from deposit products in lieu of compensating balances, service charges for transactions performed upon depositors' request, as well as fees earned from performing cash management activities. Service charges on deposit products are recognized over the period in which the related service is provided, typically monthly. Service fees are recognized at a point in time upon completion of the requested service transaction. Fees on cash management products are recognized over time as services are provided.

Payment card maintenance fee and commission income include interchange income from credit and debit card transactions and are recognized at a point in time upon settlement by the associated network. Interchange rates are generally set by the associated network based on purchase volume and other factors. Other card-related fees are recognized at a point in time upon completion of the transaction.

Other banking fees include fees for various transactional banking activities such as bank transfers, letters of credit fees and other transactional services. These fees are recognized in a manner that reflects the timing of when transactions occur and as services are provided. Letter of credit fees primarily includes fees received related to letter of credit agreements and are generally recognized upon execution of the contract.

For the years ended 31 December 2019 and 2018, fee and commission income transactions were recognised according to IFRS 15 *Revenue from Contracts with Customers*.

The adoption of IFRS 15 has not had any material impact on the disclosures or on the amounts reported in the separate financial statements.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Foreign currency translation

The separate financial statements are presented in KZT, which is the functional currency of the Bank. Transactions in foreign currencies are initially recorded in the functional currency, converted at the rate of exchange ruling at the date of the transaction. Monetary assets and liabilities denominated in foreign currencies are retranslated at the currency rate of exchange as quoted by KASE as at the reporting date. Gains and losses resulting from the translation of foreign currency transactions into functional currency are recognized in the statement of profit or loss as net foreign exchange gain or loss. Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates as at the dates of the initial transactions. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value was determined.

Differences between the contractual exchange rate of a transaction in a foreign currency and the market exchange rate on the date of the transaction are included in net foreign exchange gain or loss. The market exchange rate at 31 December 2019 was 382.59 KZT to USD 1 (31 December 2018 – KZT 384.20).

Segment reporting

A segment is a distinguishable component of the Bank that is engaged either in providing products or services (business segment), or in providing products or services within a particular economic environment (geographical segment), which is subject to risks and rewards that are different from those of other segments.

Financial guarantee contracts and letters of credit issued

Financial guarantee contracts and letters of credit issued by the Bank are credit insurance that provides for specified payments to be made to reimburse the holder for a loss it incurs because a specified debtor fails to make a payment when due under the original or modified terms of a debt instrument. Such financial guarantee contracts and letters of credit issued are initially recognized at fair value. Subsequently they are measured at the higher of (a) the amount recognized as a provision and (b) the amount initially recognized less, where appropriate, cumulative amortization of initial premium revenue received over the financial guarantee contracts or letter of credit issued.

New and amended IFRS Standards that are effective for the current year

In the current year, the following new and revised Standards and Interpretations have been adopted and have affected the amounts reported in these separate financial statements:

- Impact of initial application of IFRS 16 Leases;
- Amendments to IFRS 9 Prepayment Features with Negative Compensation;
- Amendments to IAS 28 Long-term Interest in Associates and Joint Ventures;
- Amendments to IFRSs Annual Improvements to IFRS Standards 2015-2017 Cycle;
- IFRIC 23 Uncertainty over Income Tax Treatments.

Impact of initial application of IFRS 16 Leases

In the current year, the Bank has applied IFRS 16 (as issued by the IASB in January 2016) that is effective for annual periods that begin on or after 1 January 2019.

The Bank has initially adopted IFRS 16 *Leases* from 1 January 2019. IFRS 16 introduces a single, on-balance sheet accounting model for lessees. As a result, the Bank, as a lessee, has recognised a right-of-use asset representing its rights to use underlying assets and liabilities representing its obligations to make lease payments. IFRS 16 substantially carries forward the lessor accounting requirements in IAS 17 *Leases* ("IAS 17"). Accordingly, there are no changes to the Bank's accounting policy for lessor accounting.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

The Bank has applied IFRS 16 using the modified retrospective approach, which means the adoption from 1 January 2019 with no restatement of comparative periods - i.e. comparative period is presented as previously reported under IAS 17 and related interpretations. The details of the changes in the accounting policies, nature and the impact that is relevant to the Bank's operations are described below.

Impact of the new definition of a lease

The Bank made use of the practical expedient available on transition to IFRS 16 not to reassess whether a contract is or contains a lease. Accordingly, the definition of a lease in accordance with IAS 17 and IFRIC 4 continued to apply to those leases entered or modified before 1 January 2019.

The change in definition of a lease mainly relates to the concept of control. This is in contrast to the focus on "risks and rewards" in IAS 17 and IFRIC 4. IFRS 16 distinguishes between leases and service contracts on the basis of whether the use of an identified asset is controlled by the customer. Control is considered to exist if the customer has:

- the right to obtain substantially all of the economic benefits from the use of an identified asset; and
- the right to direct the use of that asset.

The Bank applied the definition of a lease and related guidance set out in IFRS 16 to all lease contracts entered into or modified on or after 1 January 2019, (whether it is a lessor or a lessee in the lease contract).

In preparation for the first-time application of IFRS 16, the Bank has carried out an implementation project. The project has shown that the new definition in IFRS 16 will not significantly change the scope of contracts that meet the definition of a lease for the Bank.

Impact on lessee accounting

Operating leases

IFRS 16 changed how the Bank accounted for leases previously classified as operating leases under IAS 17, which were off balance sheet.

On initial application of IFRS 16, for all leases (except as noted below), the Bank:

- a) Recognised right of use assets and lease liabilities in the statement of financial position within "Property and equipment" and "Other liabilities", respectively. The lease liabilities were at transition initially measured at the present value of the remaining lease payments, discounted using the incremental borrowing rate at the date of initial application 1 January 2019. The right-of-use assets were initially recognised at the value of the corresponding lease liability, as the Bank used the simplified approach for contracts previously classified as operating lease;
- b) Recognised depreciation of right of use assets as depreciation expense within "Operating expenses" and interest on lease liabilities within "Interest expense" in the statement of profit or loss;
- c) Separated the total amount of cash paid into a principal portion (presented within financing activities) and interest (presented within operating activities) in the cash flow statement.

Under IFRS 16, right of use assets are tested for impairment in accordance with IAS 36 "Impairment of Assets". This replaced the previous requirement to recognise a provision for onerous lease contracts.

For short-term leases (lease term of 12 months or less) and leases of low value assets (such as personal computers and office furniture), the Bank opted to recognise a lease expense on a straight-line basis as permitted by IFRS 16.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Lease incentives (e.g. rent-free period) are recognised as part of the measurement of the right-of-use assets and lease liabilities whereas under IAS 17 they resulted in the recognition of a lease incentive, amortised as a reduction of rental expenses generally on a straight-line basis.

Finance leases

The main differences between IFRS 16 and IAS 17 with respect to assets formerly held under a finance lease is the measurement of the residual value guarantees provided by the lessee to the lessor. IFRS 16 requires that the Bank recognises as part of its lease liability only the amount expected to be payable under a residual value guarantee, rather than the maximum amount guaranteed as required by IAS 17. This change did not have a material effect on the Bank's separate financial statements.

Impact on lessor accounting

Where the Bank acts as a lessor, the requirements remain largely unchanged and the distinction between finance and operating leases is maintained. The accounting policies applicable to the Bank as a lessor are not different from those under IAS 17. However, IFRS 16 has changed and expanded the disclosures required, in particular regarding how a lessor manages the risks arising from its residual interest in leased assets.

The management of the Bank does not expect that the application of these changes will have an impact on the separate financial statements of the Bank.

Summary of impact upon adoption of IFRS 16

As at 1 January 2019, an assessment indicates that the Bank recognised a right of use asset of KZT 3,077 million and presented as part of 'Property and equipment' and a corresponding lease liability of KZT 3,077 million and presented as part of 'Other liabilities' in respect of all these leases. In the Separate Statement of Profit or Loss, expenses related to leases are presented as depreciation expenses within 'Operating expenses' and interest expenses within 'Interest expenses'.

Based on an analysis of the Bank's finance leases as at 1 January 2019 and on the basis of the facts and circumstances that exist at that date, the management of the Bank has assessed that the change did not have a significant impact on the amounts recognised in the Bank's separate financial statements.

Amendments to IFRS 9 Prepayment Features with Negative Compensation.

The Bank has adopted the amendments to IFRS 9 for the first time in the current year. The amendments to IFRS 9 clarify that for the purpose of assessing whether a prepayment feature meets the SPPI condition, the party exercising the option may pay or receive reasonable compensation for the prepayment irrespective of the reason for prepayment. In other words, financial assets with prepayment features with negative compensation do not automatically fail SPPI.

Amendments to IAS 28 Long-term Interests in Associates and Joint Ventures.

The Bank has adopted the amendments to IAS 28 for the first time in the current year. The amendment clarifies that IFRS 9, including its impairment requirements, applies to other financial instruments in an associate or joint venture to which the equity method is not applied. These include long-term interests that, in substance, form part of the entity's net investment in an associate or joint venture. The Bank applies IFRS 9 to such long-term interests before it applies IAS 28. In applying IFRS 9, the Bank does not take account of any adjustments to the carrying amount of long-term interests required by IAS 28 (i.e., adjustments to the carrying amount of long-term interests arising from the allocation of losses of the investee or assessment of impairment in accordance with IAS 28).

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Annual Improvements to IFRS Standards 2015–2017 Cycle Amendments to IFRS 3 Business Combinations, IFRS 11 Joint Arrangements, IAS 12 Income Taxes and IAS 23 Borrowing Costs.

The Bank has adopted the amendments included in the Annual Improvements to IFRS Standards 2015–2017 Cycle for the first time in the current year. The Annual Improvements include amendments to four Standards:

IAS 12 Income Taxes

The amendments clarify that the Bank should recognise the income tax consequences of dividends in profit or loss, other comprehensive income or equity according to where the Bank originally recognised the transactions that generated the distributable profits. This is the case irrespective of whether different tax rates apply to distributed and undistributed profits.

IAS 23 Borrowing Costs

The amendments clarify that if any specific borrowing remains outstanding after the related asset is ready for its intended use or sale, that borrowing becomes part of the funds that an entity borrows generally when calculating the capitalisation rate on general borrowings.

IFRS 3 Business Combinations

The amendments clarify that when the Bank obtains control of a business that is a joint operation, the Bank applies the requirements for a business combination achieved in stages, including remeasuring its previously held interest (PHI) in the joint operation at fair value. The PHI to be remeasured includes any unrecognised assets, liabilities and goodwill relating to the joint operation.

IFRS 11 Joint Arrangements

The amendments clarify that when a party that participates in, but does not have joint control of, a joint operation that is a business obtains joint control of such a joint operation, the Bank does not remeasure its PHI in the joint operation.

IFRIC 23 Uncertainty over Income Tax Treatments.

The Bank has adopted IFRIC 23 for the first time in the current year. IFRIC 23 sets out how to determine the accounting tax position when there is uncertainty over income tax treatments. The Interpretation requires the Bank to:

- determine whether uncertain tax positions are assessed separately or as a group; and
- assess whether it is probable that a tax authority will accept an uncertain tax treatment used, or proposed to be used, by an entity in its income tax filings:
 - If yes, the Bank should determine its accounting tax position consistently with the tax treatment used or planned to be used in its income tax filings.
 - If no, the Bank should reflect the effect of uncertainty in determining its accounting tax position using either the most likely amount or the expected value method

The implementation of IFRIC 23 had no significant impact on the separate financial statements of the Bank.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

New and revised IFRS Standards in issue but not yet effective

The Bank has not applied the following new and revised IFRS Standards that have been issued but are not yet effective:

- Amendments to IFRS 3:
- Amendments to IAS 1 and IAS 8:
- Conceptual Framework.

The management does not expect that the adoption of the Standards listed above will have a material impact on the financial statements of the Bank in future periods, except as noted below:

Amendments to IFRS 3 Definition of a business

The amendments clarify that while businesses usually have outputs, outputs are not required for an integrated set of activities and assets to qualify as a business. To be considered a business an acquired set of activities and assets must include, at a minimum, an input and a substantive process that together significantly contribute to the ability to create outputs.

Additional guidance is provided that helps to determine whether a substantive process has been acquired.

The amendments introduce an optional concentration test that permits a simplified assessment of whether an acquired set of activities and assets is not a business. Under the optional concentration test, the acquired set of activities and assets is not a business if substantially all of the fair value of the gross assets acquired is concentrated in a single identifiable asset or group of similar assets.

The amendments are applied prospectively to all business combinations and asset acquisitions for which the acquisition date is on or after the first annual reporting period beginning on or after 1 January 2020, with early application permitted.

The management of the Bank does not expect that the application of these amendments will have an impact on the separate financial statements of the Bank.

Amendments to IAS 1 and IAS 8 Definition of material

The amendments are intended to make the definition of material in IAS 1 easier to understand and are not intended to alter the underlying concept of materiality in IFRS Standards. The concept of 'obscuring' material information with immaterial information has been included as part of the new definition.

The threshold for materiality influencing users has been changed from "could influence" to "could reasonably be expected to influence".

The definition of material in IAS 8 has been replaced by a reference to the definition of material in IAS 1. In addition, the IASB amended other Standards and the Conceptual Framework that contain a definition of material or refer to the term 'material' to ensure consistency.

The amendments are applied prospectively for annual periods beginning on or after 1 January 2020, with earlier application permitted.

The management of the Bank does not expect that the application of these changes will have an impact on the separate financial statements of the Bank.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Amendments to References to the Conceptual Framework in IFRS Standards

Together with the revised *Conceptual Framework*, which became effective upon publication on 29 March 2018, the IASB has also issued Amendments to References to the Conceptual Framework in IFRS Standards. The document contains amendments to IFRS 2, IFRS 3, IFRS 6, IFRS 14, IAS 1, IAS 8, IAS 34, IAS 37, IAS 38, IFRIC 12, IFRIC 19, IFRIC 20, IFRIC 22, and SIC-32.

Not all amendments, however, update those pronouncements with regard to references to and quotes from the framework so that they refer to the revised Conceptual Framework. Some pronouncements are only updated to indicate which version of the Framework they are referencing to (the IASC Framework adopted by the IASB in 2001, the IASB Framework of 2010, or the new revised Framework of 2018) or to indicate that definitions in the Standard have not been updated with the new definitions developed in the revised Conceptual Framework. The amendments, where they actually are updates, are effective for annual periods beginning on or after 1 January 2020, with early application permitted.

The management of the Bank do not anticipate that the application of the amendments in the future will have a significant impact on the Bank's separate financial statements.

4. Significant accounting estimates

The preparation of the Bank's separate financial statements requires management to make estimates and judgments that affect the reported amount of assets and liabilities at the date of the financial statements and the reported amount of income and expenses during the reporting period. Management evaluates its estimates and judgments on an ongoing basis. Management bases its estimates and judgments on historical experience and on various other factors that are believed to be reasonable under the circumstances. Actual results may differ from these estimates under different assumptions or conditions. The following estimates and judgments are considered important to the portrayal of the Bank's financial condition.

Business model assessment

Classification and measurement of financial assets depends on the results of the SPPI and the business model test. The Bank determines the business model at a level that reflects how groups of financial assets are managed together to achieve a particular business objective. This assessment includes judgement reflecting all relevant evidence including how the performance of the assets is evaluated and their performance measured, the risks that affect the performance of the assets and how these are managed and how the managers of the assets are compensated.

The Bank monitors financial assets measured at amortised cost or fair value through other comprehensive income that are derecognised prior to their maturity to understand the reason for their disposal and whether the reasons are consistent with the objective of the business for which the asset was held. Monitoring is part of the Bank's continuous assessment of whether the business model for which the remaining financial assets are held continues to be appropriate and if it is not appropriate whether there has been a change in business model and so a prospective change to the classification of those assets.

Significant increase of credit risk

As explained in Note 3, ECL are measured as an allowance equal to 12-month ECL for Stage 1 assets, or lifetime ECL assets for Stage 2 or Stage 3 assets. An asset moves to Stage 2 when its credit risk has increased significantly since initial recognition. In assessing whether the credit risk of an asset has significantly increased, the Bank takes into account qualitative and quantitative reasonable and supportable forward-looking information (Refer to Note 32 for more details).

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Establishing the number and relative weightings of forward-looking scenarios for each type of product/market and determining the forward-looking information relevant to each scenario

For treasury operations, the Bank calculates ECL on a financial asset based not only on the current estimates of the credit quality of the counterparty/issuer at the reporting date, but also taking into account possible deterioration of the financial condition due to the adverse macroeconomic factors of the counterparty's/issuer's environment in the future. In particular, the level of ECL for treasury operations is affected by the rating outlook (positive, stable, negative) assigned by international rating agencies, which affects the probability of default ("PD").

For bank loans, the calculation of ECL takes into account the possible estimated effects of changes in macroeconomic parameters on forecasted cash flows, migration of collective loans and collateral coverage.

When measuring ECL the Bank uses reasonable and supportable forward-looking information, which is based on assumptions for the future movement of different economic drivers and how these drivers will affect each other. Refer to Note 32 for more details.

The key inputs used for measuring ECL are:

- Probability of default (PD);
- Loss given default (LGD); and
- Exposure at default (EAD).

Probability of default

PD constitutes a key input in measuring ECL. PD is an estimate of the likelihood of default over a given time horizon, the calculation of which includes historical data, assumptions and expectations of future conditions.

PD for treasury operations is determined according to the Default Study from international rating agencies (S&P, Fitch, Moody's), which publish tabular data with the values of the probabilities of default. The probabilities of default are maintained up to date and are updated on a periodic basis as the default statistics are updated.

PD for individually assessed loans of corporate, small and medium businesses is estimated using an internal rating model based on the quantitative and qualitative characteristics of the borrower. The calculation of PD on loans assessed on a collective basis is carried out on the basis of historical data using the migration matrices and roll-rates.

Loss Given Default

LGD is an estimate of the loss arising on default. It is based on the difference between the contractual cash flows due and those that the lender would expect to receive, taking into account cash flows from collateral and integral credit enhancements.

LGD for treasury operations is determined according to the Default Study data from international rating agencies (S&P, Fitch, Moody's) and depends on the type of debt on the financial asset: senior secured/unsecured, subordinated, sovereign. In addition, LGD may be adjusted if collateral is provided for the asset, as well as if there are indications of impairment for the financial asset (Stage 2 or Stage 3).

LGD for collectively assessed loans is calculated based on an estimate of the recoverability of debt in case of the pledged collateral sale with a discount period that corresponds to the pledged collateral implementation terms.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Exposure at Default

EAD is an estimate of the exposure at a future default date, taking into account expected changes in the exposure after the reporting date, including repayments of principal and interest, and expected drawdowns on committed facilities. The Bank's modelling approach for EAD reflects expected changes in the balance outstanding over the lifetime of the loan exposure that are permitted by the current contractual terms, such as amortization profiles, early repayment or overpayment, changes in utilization of undrawn commitments and credit mitigation actions taken before default. The Bank uses EAD models that reflect the characteristics of the portfolios.

Establishing groups of assets with similar credit risk characteristics

When ECLs are measured on a collective basis, the financial instruments are grouped on the basis of shared risk characteristics. Refer to Note 32 for details of the characteristics considered in this judgement. The Bank monitors the appropriateness of the credit risk characteristics on an ongoing basis to assess whether they continue to be similar. This is required in order to ensure that should credit risk characteristics change there is appropriate re-segmentation of the assets. This may result in new portfolios being created or assets moving to an existing portfolio that better reflects the similar credit risk characteristics of that group of assets. Re-segmentation of portfolios and movement between portfolios is more common when there is a significant increase in credit risk (or when that significant increase reverses) and so assets move from 12-month to lifetime ECLs, or vice versa, but it can also occur within portfolios that continue to be measured on the same basis of 12-month or lifetime ECLs but the amount of ECL changes because the credit risk of the portfolios differ.

Models and assumptions used

The Bank uses various models and assumptions in measuring fair value of financial assets as well as in estimating ECL. Judgement is applied in identifying the most appropriate model for each type of asset, as well as for determining the assumptions used in these models, including assumptions that relate to key drivers of credit risk. See Notes 21 and 32 for more details on allowances for ECL and Note 35 for more details on fair value measurement.

The allowances for ECL of financial assets in the separate financial statements have been determined on the basis of existing economic and political conditions. The Bank is not in a position to predict what changes in conditions will take place in Kazakhstan and in other countries it operates in and what effect such changes might have on the adequacy of the allowances for ECL of financial assets in future years.

The carrying amount of the allowance for ECL of loans to customers as at 31 December 2019 is KZT 366,577 million (31 December 2018 - KZT 366,728 million).

Fair value measurement and valuation process

In estimating the fair value of a financial asset or a liability, the Bank uses market-observable data to the extent it is available. Where such Level 1 inputs are not available, the Bank uses valuation models to determine the fair value of its financial instruments. Refer to Note 35 for more details on fair value measurement.

Property and equipment carried at revalued amounts

Buildings and construction are measured at revalued amounts. The latest appraisal was in June 2018. Details of the valuation techniques used are set out in Note 14.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Taxation

Kazakhstan tax, currency and customs legislations are subject to varying interpretations and changes, which can occur frequently. Management's interpretation of such legislation as applied to the transactions and activity of the Bank may be challenged by the relevant regional and state authorities. Fiscal periods remain open to review by the authorities in respect of taxes for five calendar years preceding the year of review.

Management has concluded that all deferred tax assets are properly recognized, as it is probable that sufficient future taxable income will exist to fully utilize the assets.

As at 31 December 2019, management believes that its interpretation of the relevant legislation is appropriate and that the Bank's tax, currency and customs positions will be sustained. Significant additional actual taxes, penalties and interest may be assessed following any challenges by the relevant authorities, which could have a material impact on the Banks's reported net income.

5. Cash and cash equivalents

Cash and cash equivalents comprise:

	31 December 2019	31 December 2018
Cash on hand	170,542	188,171
Correspondent accounts with Organization for Economic Co-operation		
and Development countries (the "OECD") based banks	154,153	119,767
Short-term deposits with OECD based banks	595,231	246,121
Correspondent accounts with NBRK	418,688	928,554
Short-term deposits with NBRK	191,337	140,064
Short-term deposits with Kazakhstan banks (incl. loans under reverse		
repurchase agreements)	37,516	18,904
Correspondent accounts with non-OECD based banks	20,745	10,523
Short-term deposits with non-OECD based banks	11,480	33,770
	1,599,692	1,685,874

As at 31 December 2019 and 2018, cash and cash equivalents allowances for expected credit losses comprised KZT 14 million and KZT 7 million, respectively (Note 21).

Interest rates and currencies in which interest earning cash equivalents are denominated are as follows:

_	31 December 2019					31 December 2018	
	KZT	Foreign currencies	KZT	Foreign currencies			
Short-term deposits with OECD based banks Short-term deposit with NBRK Short-term deposits with Kazakhstan banks (incl. loans under reverse	- -	1.0%-2.5% 0.5%	- 8.3%	2.4%-2.8%			
repurchase agreements) Short-term deposits with non-OECD based bank	8.8%-10.2%	- 2.8%-5.8%	8.3%-9.5% 10.0%	- 0.2%-9.5%			

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Fair value of assets pledged and carrying amounts of loans under reverse repurchase agreements as at 31 December 2019 and 2018 are as follows:

	31 December 2019			31 December 2018
	Carrying amount of loans	Fair value of collateral	Carrying amount of loans	Fair value of collateral
Treasury bills of the Ministry of				
Finance of Kazakhstan	8,108	8,427	9,557	10,121
Notes of NBRK	15,404	15,881	9,246	9,523
Debt securities of foreign				
corporations	5,000	5,556	-	-
Debt securities of Kazakhstan	·			
corporations	9,004	9,777	-	=
Bonds of international financial	,	•		
organizations	-		101	102
	37,516	39,641	18,904	19,746

6. Obligatory reserves

Obligatory reserves comprise:

	31 December 2019	31 December 2018
Due from the NBRK allocated to obligatory reserves	133,033	105,856
	133,033	105,856

The obligatory reserves represent the minimum reserve deposits and cash on hand balances required by the NBRK and used for calculation of the minimum reserve requirement.

7. Financial assets and liabilities at fair value through profit or loss

Financial assets at fair value through profit or loss comprise:

	31 December 2019	31 December 2018
Financial assets held for trading: Derivative financial instruments	4,653	97,927
Financial liabilities at fair value through profit or loss comprise:		
	31 December 2019	31 December 2018
Financial liabilities held for trading: Derivative financial instruments	20,009	7,016

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Derivative financial instruments comprise:

		31 De	cember 2019		31 Dec	cember 2018
	Notional Amount	Asset	Fair value Liability	Notional Amount	Asset	Fair value Liability
Foreign currency cont- racts						
Swaps	947,346	4,642	19,984	1,221,331	97,709	6,998
Spots	29,903	11	25	22,554	142	10
Forwards	-	-	<u>-</u>	326	76	8
		4,653	20,009		97,927	7,016

On 3 July 2019, the Bank and NBRK closed a one-year cross-currency swap deal and at the same time concluded another one-year cross-currency swap deal for the notional amount of KZT 378,066 million. The purpose of the deal is the placement of excess foreign currency liquidity.

As at 31 December 2019 and 2018, the Bank used quoted market prices from independent information sources for all of its financial assets recorded at fair value through profit or loss, with the exception of derivative financial instruments, which are valued using valuation models based on observable market data.

8. Amounts due from credit institutions

Amounts due from credit institutions comprise:

	31 December 2019	31 December 2018
Term deposits	70,567	51,844
Loans to credit institutions	27,179	32,873
Deposit pledged as collateral for derivative financial instruments	12,864	9,113
	110,610	93,830
Less - Allowances for expected credit losses (Note 21)	(201)	(337)
	110,409	93,493

Interest rates and maturities of amounts due from credit institutions are presented as follows:

	31 December 2019		31 December 2018	
	Interest rate, %	Maturity, year	Interest rate, %	Maturity, year
Term deposits	1.0%-8.0%	2020-2027	1.0%-8.5%	2027
Loans to credit institutions Deposit pledged as collateral for	1.7%-4.0%	2020-2023	2.0%-4.0%	2022
derivative financial instruments	1.8%-3.0%	2046	1.8%-3.0%	2046

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

9. Financial assets at fair value through other comprehensive income

Debt securities comprise:

	31 December 2019	31 December 2018
Notes of NBRK	422,791	745,941
Treasury bills of the Ministry of Finance of Kazakhstan	419,190	391,372
Treasury bills of the USA	342,889	249,142
Corporate bonds	180,489	178,819
Bonds of foreign organizations	92,623	39,041
Bonds of JSC Development Bank of Kazakhstan	78,850	74,680
Treasury bills of Hungary	9,061	8,757
Bonds of Kazakhstan banks	<u> </u>	11,716
	1,545,893	1,699,468

As at 31 December 2019 and 2018, the allowances for expected credit losses on financial assets at fair value through other comprehensive income was KZT 520 million and KZT 531 million, respectively (Note 21).

As at 31 December 2019 and 2018, financial assets at fair value through other comprehensive income included Treasury bills of the Ministry of Finance of Kazakhstan at fair value of KZT 76,809 million and KZT nil, respectively, were pledged under repurchase agreements with the other banks (see Note 19).

Interest rates and maturities of financial assets at fair value through other comprehensive income are presented in the table below. Interest rates in the table below are calculated as weighted average of the effective interest rates for the respective securities.

	31 December 2019		31 D	ecember 2018
	Interest rate, %	Maturity, year	Interest rate, %	Maturity, year
Notes of NBRK	9.2%	2020	8.8%	2019
Treasury bills of the Ministry of				
Finance of Kazakhstan	4.7%	2020-2045	5.2%	2019-2045
Treasury bills of the USA	2.1%	2020	1.8%	2019
Corporate bonds	8.3%	2020-2027	6.8%	2019-2027
Bonds of foreign organizations	5.7%	2020-2024	7.6%	2019-2023
Bonds of JSC Development Bank of				
Kazakhstan	5.7%	2022-2032	5.9%	2022-2032
Treasury bills of Hungary	3.2%	2023	3.2%	2023
Bonds of Kazakhstan banks	-	-	9.0%	2019

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

10. Debt securities at amortised cost, net of allowances for expected credit losses

Debt securities at amortised cost, net of allowances for expected credit losses comprise:

	31 December 2019	31 December 2018
Treasury bills of the Ministry of Finance of Kazakhstan	1,044,902	1,044,939
Corporate bonds	154,351	
	1,199,253	1,044,939

On 20 September 2019, the Bank acquired "Astana LRT" LLP's bonds in the amount of USD 400 million. The coupon rate of 3.25% corresponds to market conditions. Despite the financial difficulty of the issuer, the underlying project is of strategic significance to the city of Nur-Sultan and has full government support for completion, which is evidenced by the fact that the repayment of bonds is guaranteed in full by the Ministry of Finance of the Republic of Kazakhstan. As such, the Bank has concluded that these are not originated credit-impaired assets.

As at 31 December 2019 and 2018, the allowances for expected credit losses on debt securities at amortised cost was KZT 538 million and KZT 418 million, respectively (Note 21).

Interest rates and maturities of debt securities at amortised cost, net of allowances for expected credit losses are presented in the table below. Interest rates in the table below are calculated as weighted average of the effective interest rates for the respective securities.

	31 December 2019		31 December 2018	
	Interest rate, %	Maturity, year	Interest rate, %	Maturity, year
Treasury bills of the Ministry of Finance				
of Kazakhstan	9.3%	2022-2027	9.3%	2022-2027
Corporate bonds	3.3%	2024	-	-

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

11. Investments in subsidiaries

Subsidiaries		Holding %	Count	ry	Industry
_	31 December 2019	31 December 2018			
LLC Halyk Project JSC Insurance Company	100	100	Kazakhstan		anagement of ful and loss assets
Halyk JSC Commercial Bank	99.86	99.86	Kazakhstan	Ger	neral insurance
Moskommertsbank	100	100	Russia	Ma	Banking anagement of
LLP KUSA Halyk	100	100	Kazakhstan	doubt	ful and loss assets
LLP Halyk Activ JSC Kazkommerts	100	100	Kazakhstan		ful and loss assets Broker
Securities	100	100	Kazakhstan	and	dealer activities Broker
JSC Halyk Finance	100	100	Kazakhstan	and	dealer activities
JSC Halyk-Life	100	100	Kazakhstan	Li	ife insurance
JSC Halyk-Leasing	100	100	Kazakhstan		Leasing
JSC Halyk Bank Georgia	100	100	Georgia	Ma	Banking anagement of
LLP Halyk Activ-1	100	100	Kazakhstan	doubt	ful and loss assets
JSCB Tenge Bank OJSC Halyk Bank	100	-	Uzbekistan		Banking
Kyrgyzstan	100	100	Kyrgyzstan		Banking
CJSC Halyk Bank Tajikistan	100	100	Tajikistan		Banking
JSC Kazteleport	100	100	Kazakhstan	Teled	communications
LLC Halyk Collection	100	100	Kazakhstan		collection services nt card processing
JSC Halyk Finservice	100	100	Kazakhstan		her related services
Subsidiaries			31 De	ecember 2019	31 December 2018
LLC Halyk Project				35,495	30,958
JSC Insurance Company Hal	yk			32,700	32,700
JSC Commercial Bank Mosko	mmertsbank			25,167	7,047
LLP KUSA Halyk				24,964	16,906
LLP Halyk Activ				21,222	17,278
JSC Kazkommerts Securities	;			15,081	15,081
JSC Halyk Finance				11,240	11,240
JSC Halyk-Life				11,118	11,118
JSC Halyk-Leasing				9,548	9,548
ICC Halvis Bank Coordin				7 074	r.007

JSC Halyk Bank Georgia 7,874 5,897 LLP Halyk Activ-1 7,688 7,688 5,321 JSCB Tenge Bank OJSC Halyk Bank Kyrgyzstan 4,951 1,645 CJSC Halyk Bank Tajikistan 3,385 3,385 JSC Kazteleport 1,505 616 LLC Halyk Collection 859 859 JSC Halyk Finservice 342 342 218,460 172,308

On 26 July 2018, the Joint General Shareholder Meeting (JGSM) of the Bank and KKB made a resolution to approve the Transfer Certificate stipulating the transfer to the Bank, as the assignee, of KKB's property, rights and obligations, as well as all rights and obligations with respect to all KKB's creditors and debtors, and the Bank's succession of all KKB's rights and obligations. At the same time, the JGSM approved the ratio of 0.956552, at which KKB common shares would be exchanged for the Bank's common shares. The exchange ratio was calculated in accordance with the formula approved by the resolution of the JGSM of the Bank and KKB dated 20 April 2018.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

On 27 July 2018, the Bank and KKB signed the Transfer Certificate, which represents legal registration of the transfer of all KKB's property, rights and obligations to the Bank within the framework of voluntary reorganisation of the Bank and KKB via a legal merger of KKB with the Bank.

Within the framework of the voluntary reorganization of the Bank and KKB via a legal merger of KKB with the Bank, the Bank's 758,687,723 common shares were allocated among the shareholders of KKB (excluding the Bank) in exchange for KKB's common shares according to the share exchange ratio approved at the JGSM of the Bank and KKB dated 26 July 2018.

On 22 May 2018, the Bank announced the completion of the reorganization thereof through the merger of JSC NBK-Bank (Subsidiary of JSC Halyk Bank) into the Commercial Bank "Moskommertsbank" (JSC) (Subsidiary of JSC Kazkommertsbank).

On 29 August 2018, the Bank announced the completion of transferring all property and all rights and obligations of JSC Insurance Company Kazkommerts-Policy (Subsidiary of JSC Kazakhinstrakh (Subsidiary of JSC Halyk Bank).

On 1 November 2018, within the framework of voluntary reorganization, JSC Halyk-Life (Subsidiary of JSC Halyk Bank) and JSC Life Insurance Company Kazkommerts Life (Subsidiary of JSC Kazkommertsbank) signed the Transfer Certificate, as a result of which JSC Halyk-Life became the full assignee of all the rights and obligations of JSC Life Insurance Company Kazkommerts Life.

On 29 August 2018, the Board of Directors of the Bank approved the establishment of a new subsidiary in Uzbekistan – JSCB Tenge Bank. On 24 May 2019, the Central Bank of Uzbekistan issued a license to JSCB Tenge Bank for carrying out banking and other operations. On 10 July 2019, JSCB Tenge Bank started to serve customers in Uzbekistan and on that date is included in the separate financial statements.

12. Investments in associate

Significant associate of the Bank accounted for using the equity method as at reporting date is set out below:

		•	wnership interest rights held by the Bank
Name	Principal activity	Place of incorporation and principal place of business	31 December 2019 and 2018
JSC Altyn Bank	Bank	Kazakhstan	40%

Summarised financial information in respect of the Bank's investment in associate is set out below.

	31 December 2019	31 December 2018
Total assets	523,956	442,840
Total liabilities	467,199	401,822
Net assets	56,757	41,018

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

	31 December 2019	From 24 April 2018 until 31 December 2018
Interest income	34,075	19,055
Net profit	14,356	7,248
Other comprehensive income/(loss) for the period	1,382	(419)
Total comprehensive income for the period	15,738	6,559
Dividends received from associate during the period	_	_

Reconciliation of the above summarised financial information to the carrying amount of the interest in JSC Altyn Bank recognised in the financial statements:

	31 December
Acquisition cost	17,705
The Bank's share of the associate's profit	2,899
Share of other comprehensive loss of associate	(167)
Dividends received from associate	
Carrying amount of the Bank's interest in JSC Altyn Bank - 2018:	20,437
The Bank's share of the associate's profit	5,742
Share of other comprehensive income of associate	553
Dividends received from associate	<u>-</u> _
Carrying amount of the Bank's interest in JSC Altyn Bank - 2019:	26,732

13. Loans to customers

Loans to customers comprise:

	31 December 2019	31 December 2018
Originated loans to customers Overdrafts	4,090,393 17,471	3,788,753 21,730
	4,107,864	3,810,483
Stage 1 Stage 2 Stage 3 POCI	3,235,981 152,056 636,815 83,012	2,946,011 119,751 645,104 99,617
Total	4,107,864	3,810,483
Less – Allowances for expected credit losses (Note 21)	(366,577)	(366,728)
Loans to customers	3,741,287	3,443,755

The average interest rate on loans to customers is calculated as interest income from loans to customers divided by monthly average balances of loans to customers. For the year ended 31 December 2019 average interest rate on loans was 12.8% (31 December 2018 - 13.3%).

As at 31 December 2019, the Bank had a concentration of loans of KZT 775,224 million to the ten largest borrowers that comprised 19% of the Bank's total gross loan portfolio (31 December 2018 – KZT 691,657 million, 18%) and 62% of the Bank's total equity (31 December 2018 – 68%).

As at 31 December 2019, the allowances for expected credit losses created against these loans was KZT 58,782 million (31 December 2018 – KZT 41,987 million).

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

The table below summarizes the amount of loans secured by type of collateral, rather than the fair value of the collateral itself:

	31 December 2019	31 December 2018
Loans collateralized by pledge of real estate or rights thereon	1,615,150	1,589,810
Loans collateralized by quarantees	862,886	694,613
Consumer loans issued within the framework of payroll projects*	637,382	506,147
Loans collateralized by cash	232,077	374,305
Loans collateralized by pledge of corporate shares	166,644	163,414
Loans collateralized by pledge of vehicles	70,285	42,450
Loans collateralized by pledge of inventories	34,213	30,154
Loans collateralized by pledge of equipment	7,784	13,059
Loans collateralized by pledge of agricultural products	7,463	7,359
Loans collateralized by mixed types of collateral	6,884	13,870
Unsecured loans	467,096	375,302
	4,107,864	3,810,483
Less – Allowances for expected credit losses (Note 21)	(366,577)	(366,728)
Total loans to customers	3,741,287	3,443,755

^{*}These loans are collateralized by cash to be received in the future from the employees of companies within the framework of salary projects.

Loans are granted to the following sectors:

	31 December		31 December		
	2019	%	2018	%	
Retail loans:					
- consumer loans	794,984	19%	699,067	18%	
- mortgage loans	211,656	5%	218,049	6%	
	1,006,640		917,116		
Services	613,655	15%	700,670	18%	
Wholesale trade	410,846	10%	384,145	10%	
Real estate	330,296	8%	333,050	9%	
Retail trade	263,334	6%	215,466	6%	
Oil and gas	202,841	5%	150,967	4%	
Construction	178,878	4%	215,195	6%	
Metallurgy	172,245	4%	188,411	5%	
Mining	169,044	4%	72,917	2%	
Transportation	165,135	4%	150,173	4%	
Agriculture	132,923	3%	125,072	3%	
Financial services	97,786	2%	73,062	2%	
Communication	91,357	2%	39,632	1%	
Energy	67,007	2%	69,827	2%	
Food industry	59,657	1%	42,516	1%	
Hotel industry	38,820	1%	29,998	1%	
Machinery	38,014	1%	33,990	1%	
Chemical industry	30,312	1%	30,603	1%	
Light industry	11,630	0%	11,224	0%	
Other	27,444	1%	26,449	1%	
	4,107,864	100%	3,810,483	100%	

As at 31 December 2019, accrued interest on loans comprised KZT 152,659 million (31 December 2018 – KZT 186,793 million).

During the years ended 31 December 2019 and 2018, the Bank received financial and non-financial assets by taking possession of collateral it held as security. As at 31 December 2019 and 2018, such assets of KZT 36,304 million and KZT 46,354 million, respectively, are included in assets held for sale.

As at 31 December 2019 and 2018, loans to customers included loans of KZT 351,440 million and KZT 417,619 million, respectively, which terms were renegotiated. Otherwise, these loans would be past due or impaired.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

14. Property and equipment

The movements in property and equipment are as follows:

	Buildings and		Computers and banking	Construction	R	ight-of-use	
Book of College Control	construction	Vehicles	equipment	in progress	Other	assets	Total
Revalued/initial cost:							
31 December 2018	92,631	1,329	30,593	46	18,058	-	142,657
Additions Recognition of right-of-use asset on adoption on IFRS 16 (Note 3)	58 -	574 -	5,879 -	410	1,736	1,636 3,077	10,293 3,077
Disposals	(3,167)	(352)	(1,545)	(421)	(647)	(736)	(6,868)
31 December 2019	89,522	1,551	34,927	35	19,147	3,977	149,159
Accumulated depreciation:							
31 December 2018	851	713	17,516		10,041		29,121
Charge for the year	1,369	185	3,540	-	1,670	919	7,683
Disposals	(159)	(340)	(1,485)	-	(381)	(110)	(2,475)
31 December 2019	2,061	558	19,571	-	11,330	809	34,329
Net book value:							
31 December 2019	87,461	993	15,356	35	7,817	3,168	114,830

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

	Buildings and construction	Vehicles	Computers and banking equipment	Construction in progress	Other	Total
Revalued/initial cost:						
31 December 2017	64,700	745	22,341	-	15,380	103,166
Additions	850	447	1,945	280	1,037	4,559
Additions due to the legal merger	30,532	153	6,980	-	1,920	39,585
Revaluation	(1,675)	-	-	-	-	(1,675)
Disposals	(1,988)	(16)	(698)	(2)	(274)	(2,978)
Transfers	212	-	25	(232)	(5)	-
31 December 2018	92,631	1,329	30,593	46	18,058	142,657
Accumulated depreciation:						
31 December 2017	982	618	14,352	-	8,746	24,698
Charge for the year	1,163	76	2,481	_	1,413	5,133
Additions due to the legal merger	200	35	1,319	_	133	1,687
Disposals	(12)	(16)	(636)	_	(251)	(915)
Write-off at revaluation	(1,482)	-	-	-	-	(1,482)
31 December 2018	851	713	17,516	-	10,041	29,121
Net book value:						
31 December 2018	91,780	616	13,077	46	8,017	113,536

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

The Bank's revaluation policy requires the entire asset class of buildings and construction to be revalued every three years. In the event of specific market or property indicators, the Bank may opt to perform revaluations more regularly.

The Bank had its buildings and properties revalued during 2018 by independent appraisers. The independent appraisers used three approaches to identify the fair value of the property and equipment - the income approach with the income capitalisation method, the comparative approach, using market information to identify the fair value of buildings and structures under active market conditions, and the cost approach when no active market existed for items subject to revaluation.

As at 31 December 2019, the fair value measurements of the Bank's buildings and construction, are categorised into Level 2 and Level 3, in the amount of KZT 87,438 million and KZT 23 million, respectively (31 December 2018: KZT 91,241 million and KZT 539 million, respectively). A description of the measurement hierarchy is disclosed in Note 35.

As at 31 December 2019, the total fair value of buildings and construction was KZT 87,461 million. As at 31 December 2019, the carrying amount of property and equipment that would have been recognised had the assets been carried under the cost model is KZT 85,300 million.

As at 31 December 2018, the total fair value of buildings and construction was KZT 91,780 million. As at 31 December 2018, the carrying amount of property and equipment that would have been recognised had the assets been carried under the cost model is KZT 81,927 million.

15. Intangible assets

The movements in intangible assets are as follows:

	ā	Licensing greements on the		
		rights to use	Other intangible	
	Software	software	assets	Total
Cost:				
31 December 2017	12,264	3,366	251	15,881
Additions	1,300	468	2	1,770
Additions due to the legal merger	1,469	391	1	1,861
Disposals	(2,690)	(684)	<u> </u>	(3,374)
31 December 2018	12,343	3,541	254	16,138
Additions	2,024	9	423	2,456
Disposals	(643)	(171)	(31)	(845)
31 December 2019	13,724	3,379	646	17,749
Accumulated depreciation				
31 December 2017	10,742	994	1	11,737
Charge for the year	1,805	172	-	1,977
Additions due to the legal merger	517	43	-	560
Disposals	(2,679)	(684)	-	(3,363)
31 December 2018	10,385	525	1	10,911
Charge for the year	1,335	350	67	1,752
Disposals	(643)	(169)	(31)	(843)
31 December 2019	11,077	706	37	11,820
Net Book Value				
31 December 2018	1,958	3,016	253	5,227
31 December 2019	2,647	2,673	609	5,929

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

16. Assets held for sale

After the default of certain counterparties on loans to customers, the Bank recognized the property pledged as collateral for the loans as assets held for sale at fair value. The assets have been subsequently measured at the lower of fair value less cost to dispose or the carrying value, as the appropriate level of management committed to a plan to sell the assets and an active programme to locate a buyer and complete the plan was initiated.

Assets held for sale comprised the following:

	31 December 2019	31 December 2018
Land plots	23,018	20,702
Real estate	14,997	26,874
Movable property	11	138
	38,026	47,714

In June 2018, the Bank performed an independent valuation of its assets held for sale and based on the results recognised an impairment loss of KZT 20,424 million.

Despite the Bank actively marketing these assets for sale, the majority have not been sold within a short timeframe. However, the management remains committed to the sale of these assets. As the assets are carried at a price not exceeding the current fair value less costs to sell, they continued to be classified as held for sale at the end of 2019 and 2018.

The fair value of the Banks's non-current assets held for sale was determined by independent appraisers. Income approach, comparative approach and cost based approach were used to estimate the fair value of those non-current assets. To estimate the fair value of the properties, the highest and best use of the properties is their current use. There has been no change to the valuation technique during the year.

Details of the Bank's assets held for sale and information about the fair value hierarchy as at 31 December 2019 and 2018 are as follows:

	Level 2	Level 3
31 December 2018		
Land plots	-	20,702
Real estate	14,718	12,156
Movable property	· -	138
31 December 2019		
Land plots	-	23,018
Real estate	12,978	2,019
Movable property	· -	11

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

17. Other assets

Other assets comprise:

	31 December 2019	31 December 2018
Other financial assets:		
Debtors on banking activities	52,143	56,478
Debtors on non-banking activities	18,585	1,354
Accrued commission income	5,053	4,587
Other	14	9
	75,795	62,428
Less – Allowances for expected credit losses (Note 21)	(16,040)	(8,321)
	59,755	54,107
Other non-financial assets:		
Prepayments for investment property	5,813	6,317
Advances for taxes other than income tax	1,800	873
Inventory	1,418	1,293
Prepayments for property and equipment	1,357	324
Other investments	873	671
Other	724	557
	11,985	10,035
	71,740	64,142

18. Amounts due to customers

Amounts due to customers include the following:

	31 December 2019	31 December 2018
Recorded at amortized cost:		
Term deposits:		
Individuals	2,679,899	2,867,441
Legal entities	1,437,188	1,369,920
	4,117,087	4,237,361
Current accounts:		
Legal entities	1,690,164	1,737,147
Individuals	499,522	461,479
	2,189,686	2,198,626
	6,306,773	6,435,987

As at 31 December 2019, the Bank's ten largest groups of related customers accounted for approximately 27% of the total amounts due to customers (31 December 2018 – 28%), where each group of related customers represents customers related to each other within that group.

As at 31 December 2019, customer accounts include collateral in the amount of KZT 85,695 million (31 December 2018 – KZT 118,052 million).

Management believes that in the event of withdrawal of funds, the Bank would be given sufficient notice so as to realize its liquid assets to enable repayment.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

An analysis of customer accounts by sector is as follows:

	31 December		31 December			
	2019	%	2018	%		
Individuals and entrepreneurs	3,179,421	50%	3,328,920	52%		
Oil and gas	581,486	9%	669,608	10%		
Other consumer services	422,964	7%	322,579	5%		
Financial services	418,647	7%	422,712	7%		
Wholesale trade	334,708	5%	243,526	4%		
Construction	229,440	4%	271,146	4%		
Transportation	215,144	3%	179,013	3%		
Healthcare and social services	211,418	3%	211,571	3%		
Government	171,330	3%	101,523	2%		
Insurance and pension funds	•		•			
activity	76,593	1%	93,076	1%		
Metallurgy	70,373	1%	67,332	1%		
Communication	61,040	1%	55,115	1%		
Education	44,694	1%	47,446	1%		
Energy	39,397	1%	64,078	1%		
Other	250,118	4%	358,342	6%		
	6,306,773	100%	6,435,987	100%		

19. Amounts due to credit institutions

Amounts due to credit institutions comprise:

	31 December 2019	31 December 2018
Recorded at amortized cost:		
Loans and deposits from Kazakhstan banks		
(incl. loans under repurchase agreements)	97,674	6,130
Loans from JSC Entrepreneurship Development Fund DAMU	91,001	86,390
Loans from JSC Development Bank of Kazakhstan	45,245	38,491
Correspondent accounts	22,564	31,364
Loans and deposits from OECD based banks	18,946	295
Loans from other financial institutions	2,417	2,812
Loans and deposits from non-OECD based banks	1,643	5
Loans from JSC National Managing Holding KazAgro	197	3,107
	279,687	168,594

As at 31 December 2019, loans from JSC Entrepreneurship Development Fund DAMU ("DAMU") included a long-term loan of KZT 90,558 million (31 December 2018 – KZT 85,956 million) at a 1.0%-4.5% interest rate maturing in 2021-2035 with an early recall option. The loan was received in accordance with the Government program ("the Program") to finance small and medium enterprises ("SMEs") operating in certain industries. According to the loan agreement between DAMU and the Bank, the Bank is responsible to extend loans to SME borrowers, eligible to participate in the Program, up to 10 years at a 6.0% interest rate.

As at 31 December 2019, loans from JSC Development Bank of Kazakhstan ("DBK") included long-term loans of KZT 30,921 million (31 December 2018 – KZT 31,171 million) at a 2.0% interest rate maturing in 2029-2037, to finance corporate enterprises operating in manufacturing industries, as well as a long-term loan of KZT 14,175 million (31 December 2018 – KZT 7,175 million) at a 1.0% interest rate maturing in 2037, to finance the purchase of cars by the Bank's retail customers. According to the loan agreement between DBK and the Bank, the Bank is responsible to extend loans to corporate borrowers, eligible to participate in the Program, up to 10 years at a 6.0% interest rate, and to retail borrowers – up to 5 years at a 4.0% interest rate.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

As at 31 December 2019, loans from JSC National Managing Holding KazAgro ("KazAgro") included a long-term loan of KZT 197 million at a 3.0% interest rate maturing in 2022 (31 December 2018 – KZT 3,103 million). The loan was received for restructuring/refinancing of loan/leasing debts of the Bank's borrowers operating in agricultural sector, originating before 1 January 2014 in connection with working capital loans, loans for the purchase of fixed assets, loans for construction-and-assembling works and loans for leasing of agriculture and technology equipment. Restructuring/refinancing of loan/leasing obligations is provided at an interest rate of 6.0% - 7.0% interest rate for the period not later than 31 December 2022.

The management of the Bank believes that there are no other similar financial instruments and due to their specific nature, the loans from DAMU, KazAgro and DBK represent separate segments in corporate, SME and retail lending. As a result, the loans from DAMU, KazAgro and DBK were received in an orderly transaction and as such have been recorded at fair value at the recognition date, which was determined to be the cash consideration transferred to the customers.

Interest rates and maturities of amounts due to credit institutions are presented as follows:

	31 De	cember 2019	31 De	cember 2018
	Interest rate, %	Maturity, Year	Interest rate, %	Maturity, Year
Loans and deposits from Kazakhstan banks (incl. loans under repurchase				
agreements)	9.5%-10.0%	2020	7.1%	2029
Loans from JSC Entrepreneurship				
Development Fund DAMU	1.0%-4.5%	2021-2035	1.0%-5.5%	2019-2035
Loans from JSC Development Bank of				
Kazakhstan	1.0%-2.0%	2029-2037	1.0%-7.9%	2019-2037
Loans and deposits from OECD based				
banks	3.6%	2020	4.0%	2019
Loans from other financial institutions	4.0%-10.0%	2023-2026	4.0%-10.0%	2023-2026
Loans and deposits from non-OECD				
based banks	8.0%	2020	-	-
Loans from JSC National Managing				
Holding KazAgro	3.0%	2022	3.0%	2022

Fair value of assets pledged (Note 9) and the carrying value of loans included in loans and deposits from Kazakhstan banks under repurchase agreements as at 31 December 2019 and 2018 are as follows:

_	31 D	ecember 2019	31 [ecember 2018
	Fair value of	Carrying amount of	Fair value of	Carrying amount of
	collateral	loans	collateral	loans
Treasury bills of the Ministry of Finance of the Republic of				
Kazakhstan	76,809	75,966	-	-

Details of transferred financial assets that are not derecognised in their entirety as at 31 December 2019 and 2018 are disclosed below.

Loans under repurchase agreements are used by the Bank to provide current cash flows in KZT within the Bank's operating activities. The Bank regularly uses this type of instrument to attract short-term liquidity and plans to continue raising funds through loans under repurchase agreements when necessary.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

The Bank has determined that it retains substantially all the risks and rewards of these securities, which include credit risk and market risk, and therefore it has not derecognised them. In addition, it recognises a financial liability for cash received as collateral.

Financial assets at fair value through other comprehensive income (Note 9)

As at 31 December 2019: Carrying amount of transferred assets Carrying amount of associated liabilities As at 31 December 2018: Carrying amount of transferred assets Carrying amount of associated liabilities

76,809 75,966

-

In accordance with the contractual terms of the loans from certain OECD based banks, the Bank is required to maintain certain financial ratios, particularly with regard to capital adequacy. Certain of the Bank's outstanding financing agreements include covenants restricting the Bank's ability to create security interests over its assets. Should the Bank default under these covenants, this could result in cross-accelerations and cross-defaults under the terms of the Bank's other financing arrangements.

The Bank's management believes that as at 31 December 2019 and 2018, the Bank was in compliance with the covenants of the agreements the Bank has with the trustees and holders of the notes.

20. Debt securities issued

Debt securities issued comprise:

	31 December 2019	31 December 2018
Recorded at amortised cost:		
Subordinated debt securities issued:		
KZT denominated bonds, fixed rate	102,027	101,909
KZT denominated bonds, indexed to inflation	<u> </u>	3,555
Total subordinated debt securities outstanding	102,027	105,464
Unsubordinated debt securities issued:		
USD denominated bonds	414,652	406,256
KZT denominated bonds	330,182	389,501
Total unsubordinated debt securities outstanding	744,834	795,757
Total debt securities issued	846,861	901,221

On 14 November 2018, the Bank repaid subordinated bonds issued in November 2008 with an initial placement amount of KZT 10,000 million. The repayment was made from the Bank's own funds.

On 1 March 2019, the Bank made a partial early repayment of bonds issued in the amount of USD 750,000,000 at a rate of 5.5% and with a repayment date in 2022. Partial repayment was made in the amount of USD 200,000,000 along with accrued but not paid interest.

In April 2019, the Bank placed senior unsecured coupon bonds in the territory of the International Financial Center "Astana" with a nominal value of USD 180,500,000 for a period of 36 months at a rate of 3% per annum.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

On 26 April 2019, the Bank redeemed subordinated bonds issued in April 2009, with an initial amount of placement of KZT 3,530 million. The repayment was made from the Bank's own funds.

On 14 November 2019, the Bank redeemed coupon bonds issued in November 2014 with an initial placement amount of KZT 59,889 million. The repayment was made from the Bank's own funds.

The coupon rates and maturities of the debt securities issued follow:

	31 De	cember 2019	31 December 2018		
	Coupon rate, %	Maturity, year	Coupon rate, %	Maturity, year	
Subordinated debt securities issued: KZT denominated bonds, fixed rate	9.5%	2025	9.5%	2025	
KZT denominated bonds, indexed to	9.5%	2023	1%+inflation	2023	
inflation	-	-	rate	2019	
Unsubordinated debt securities issued:					
USD denominated bonds	3.0%-7.3%	2021-2022	5.5%-7.3%	2021-2022	
KZT denominated bonds	7.5%-8.8%	2022-2025	7.5%-8.8%	2019-2025	

As at 31 December 2019, accrued interest on debt securities issued was KZT 18,534 million (as at 31 December 2018 – KZT 18,836 million).

Subordinated securities are unsecured obligations of the Bank and are subordinated in right of payments to all present and future senior indebtedness and certain other obligations of the Bank. Coupon payments on debt securities issued are payable on a semi-annual and an annual basis.

In accordance with the terms of the USD denominated bonds, the Bank is required to maintain certain financial covenants particularly with regard to its capital adequacy, limitations on transactions at less than fair market value and payment of dividends. Furthermore, the terms of the USD denominated bonds include covenants restricting the Bank's ability to create security interests over its assets. Should the Bank default under these covenants, this could result in cross-accelerations and cross-defaults under the terms of the Bank's other financing arrangements. The Bank's management believes that as at 31 December 2019 and 2018, the Bank was in compliance with the covenants of the agreements the Bank has with the trustees and holders of the notes.

Reconciliation of liabilities arising from financing activities

The table below details changes in the Bank's liabilities arising from financing activities, including both cash and non-cash changes. Liabilities arising from financing activities are those for which cash flows were, or future cash flows will be, classified in the Bank's separate statement of cash flows as cash flows from financing activities.

			_	Non-	cash changes_	
		1 January 2019	Financing cash flows	Foreign exchange movement	Changes in amortised cost	31 December 2019
Debt securities is	ssued	901,221	(82,261)	(2,209)	30,110	846,861
			Non-c	ash changes		
	1 January 2018	Financing cash flows	Foreign exchange movement	Changes in amortised cost	Additions due to the legal merger	31 December 2018
Debt securities issued	389,209	(62,342)	75,663	24,060	474,631	901,221

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

21. Allowances for expected credit losses

The movements in accumulated allowances for expected credit losses of financial assets were as follows:

<u>-</u>			Loans to o	customers (Note 13)		Other assets	(Note 17)		cial assets at h other comp income* (N	rehensive	Cash and cash equivalents (Note 5)	Amounts due from credit institutions (Note 8)	
	Stage 1	Stage 2	Stage 3	POCI	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	Stage 1	Stage 1	TOTAL
1 January 2019	(39,273)	(25,521)	(286,928)	(15,006)	(429)	(1,315)	(6,577)	(929)	(20)	-	(7)	(337)	(376,342)
Transfer to Stage 1	(12,423)	6,622	5,801	_	_	-	-	_	-	_	-	-	-
Transfer to Stage 2	8,869	(22,945)	14,076	-	-	-	-	-	-	-	-	-	-
Transfer to Stage 3	51,145	1,756	(52,901)	-	-	-	-	-	-	-	-	-	-
Changes in models/risk													
parameters**	14,498	(6,626)	(11,217)	(2,239)	(22)	(450)	(1,906)	9	19	-	(12)	145	(7,801)
New originations or purchases													
of financial assets**	(71,611)	-	-	-	-	-	-	(326)	-	-	-	-	(71,937)
Derecognition of financial													
assets**	12,557	1,224	30,937	11,410	-	-	-	178	-	-	-	-	56,306
Write-offs	-	-	41,867	1,687	-	-	2,518	-	-	-	-	-	46,072
Recoveries of allowances on													
previously written-off assets	-	-	(14,255)	(10,962)	-	-	(7,857)	-	-	-	-	-	(33,074)
Foreign exchange differences													
and other movements	161	296	1,821	603	-	-	(2)	10	1	-	5	(9)	2,886
31 December 2019	(36,077)	(45,194)	(270,799)	(14,507)	(451)	(1,765)	(13,824)	(1,058)	-	-	(14)	(201)	(383,890)
Total				(366,577)			(16,040)			(1,058)	(14)	(201)	(383,890)

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

_			Loans to c	ustomers Note 13)	Other assets (Note 1		Note 17)	Financial assets at fair value through other comprehensive income* (Note 9)		Cash and cash equivalents (Note 5) Cash and from credit institutions (Note 8)		t s	
	Stage 1	Stage 2	Stage 3	POCI	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	Stage 1	Stage 1	TOTAL
1 January 2018	(13,867)	(24,949)	(240,471)	-	(300)	(2,982)	(742)	(408)	-	-	(7)	(196)	(283,922)
Transfer to Stage 1	(10,927)	6,629	4,298	_	_	_	_	_	_	_	-	-	-
Transfer to Stage 2	164	(244)	80	-	-	-	-	3	(3)	-	-	-	-
Transfer to Stage 3	1,928	2,470	(4,398)	-	-	-	-	-	-	-	-	-	-
Changes in models/risk	11 270	(6,604)	(170 522)	25 525	(121)		(11 670)	F26	(15)		2	(1.4)	(1.60.71.4)
parameters**	11,270	(6,684)	(179,533)	25,525	(121)	-	(11,670)	526	(15)	-	2	(14)	(160,714)
New originations or													
purchases of financial assets**	(21,043)							(338)				_	(21,381)
Derecognition of financial	(21,043)	_	-	-	-	-	_	(336)	-	_	-	-	(21,361)
assets**	7,957	2,487	103,054	41,524	_	_	_	11	_	_	_	_	155,033
Write-offs	7,557	2,407	96,372	7,068	_	_	3,855		_	_	_	_	107,295
Recoveries of allowances			30,372	7,000			3,033						107,233
on previously written-													
off assets		_	(57,705)	(2,570)								_	(60,275)
Allowances due to the	_	_	(37,703)	(2,370)	-	-	_	-	-	_	-	-	(00,273)
legal merger	(13,435)	(3,782)	(2,863)	(80,141)	(8)	1,666	473	(696)				_	(98,786)
Foreign exchange	(13,433)	(3,762)	(2,603)	(60,141)	(6)	1,000	4/3	(090)	-	_	-	-	(90,700)
differences and other													
movements	(1,320)	(1,448)	(5,762)	(6,412)	_	1	1,507	(27)	(2)	_	(2)	(127)	(13,592)
31 December 2018	(39,273)	(25,521)	(286,928)	(15,006)	(429)	(1,315)	(6,577)	(929)	(20)	-	(7)	(337)	(376,342)
	<u>, / - / - / - / - / - / - / - / - / </u>		,			. , 1	-	· · · · · · ·		(040)		•	
Total				(366,728)			(8,321)			(949)	(7)	(337)	(376,342)

^{*}Including debt securities at amortised cost (Note 10).

** FS line "Credit loss expense" in the separate statement of profit or loss is comprised from "Changes in models/ risk parameters", "New originations or purchases of financial assets" and "Derecognition of financial assets".

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

During the years ended 31 December 2019 and 2018, the Bank has written-off loans of KZT 43,554 million and KZT 103,440 million, respectively, without this being considered as forgiveness of the loan, therefore, for tax purposes, such write-offs are not subject to corporate income tax.

Provision represents provisions against letters of credit and guarantees issued. The movements in provisions were as follows:

			31 Dec	<u>ember 2019</u>
	Stage 1	Stage 2	Stage 3	Total
At the beginning of the year	(108)	(1,038)	(948)	(2,094)
Transfer to Stage 1	<u>-</u>	-	-	-
Transfer to Stage 2	-	=	=	-
Transfer to Stage 3	1	=	(1)	-
(Additional provisions			, ,	
recognized)/recoveries	(188)	193	(1,732)	(1,727)
Foreign exchange differences	(4)	(5)	(29)	(38)
At the end of the year	(299)	(850)	(2,710)	(3,859)

<u> </u>			31 Dece	ember 2018
	Stage 1	Stage 2	Stage 3	Total
At the beginning of the year	(20)	(773)	(1,570)	(2,363)
Transfer to Stage 1	(400)	`397 [´]	3	-
Transfer to Stage 2	` -	(629)	629	-
Transfer to Stage 3	=	11,598	(11,598)	-
Recoveries	374	1,121	14,788	16,283
Allowances due to the legal merger	(63)	(12,767)	(3,220)	(16,050)
Foreign exchange differences	1	15	20	36
At the end of the year	(108)	(1,038)	(948)	(2,094)

22. Taxation

The Bank is subject to income tax in the Republic of Kazakhstan.

The income tax expense comprises:

	Year ended 31 December 2019	Year ended 31 December 2018
Current tax charge Deferred income tax (benefit)/expense relating to origination	53,972	22,208
and reversal of temporary differences	(20,440)	56,626
Income tax expense	33,532	78,834

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Deferred income tax (benefit)/expense relating to the following temporary difference:

	Year ended 31 December 2019	Year ended 31 December 2018
Fair value of derivatives and financial assets at fair value through other		
comprehensive income	(19,606)	20,178
Property and equipment, accrued depreciation	543	799
Unused tax losses of the prior year recognised in the current year	=	45,271
Loans to customers, allowances for expected credit losses	=	(3,804)
Other	(1,377)	(5,818)
Income tax (benefit)/expense	(20,440)	56,626

The tax rate for Kazakhstan companies was 20% during the years ended 31 December 2019 and 2018. Income on state and other qualifying securities is tax exempt.

The effective income tax rate differs from the statutory income tax rates. A reconciliation of the income tax expense based on Kazakhstan statutory rate of 20% with the reported income tax expense is as follows:

	Year ended 31 December 2019	Year ended 31 December 2018
Income before income tax expense Statutory tax rate	348,176 20%	360,362 20%
Income tax expense at the statutory rate Tax-exempt interest income and other related income on state and other	69,635	72,072
qualifying securities Tax-exempt income on dividends	(37,491) (2,475)	(39,133) (6,414)
Non-deductible expenditures: - derecognition of unused tax losses due to the legal merger - bonuses	- 2,931	45,271 1,984
- other provisions - general and administrative expenses	(666)	915 264
Other	1,598	3,875
Income tax expense	33,532	78,834

Deferred tax assets and liabilities comprise:

	31 December 2019	31 December 2018
Tax effect of deductible temporary differences:		_
Fair value of derivatives	3,470	54
Bonuses accrued	2,676	2,585
Vacation pay accrual	497	452
Other	87	2,449
Deferred tax asset	6,730	5,540
Tax effect of taxable temporary differences:		
Fair value adjustment on customer accounts	(42,191)	(42,951)
Property and equipment, accrued depreciation	(8,770)	(8,227)
Fair value of derivatives and financial assets at fair value through other		
comprehensive income	(41)	(19,074)
Deferred tax liability	(51,002)	(70,252)
Net deferred tax liability	(44,272)	(64,712)

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Current tax assets and liabilities comprise:

	31 December 2019	31 December 2018
Current tax refund receivable Current income tax payable	- (9,742)	32,928
Current (liability)/tax asset	(9,742)	32,928

The Bank has offset deferred tax assets and liabilities on the statement of financial position where a right of offset existed. The amounts presented after offset comprise:

	31 December 2019	31 December 2018	
Deferred tax asset	6,730	5,540	
Deferred tax liability	(51,002)	(70,252)	
Net deferred tax liability	(44,272)	(64,712)	

Kazakhstan has a number of laws related to various taxes imposed by both state and regional governmental authorities. Applicable taxes include value added tax, income tax, social taxes, and others. Implementing regulations are often unclear or nonexistent and few precedents have been established. Often, differing opinions regarding legal interpretation exist both among and within government ministries and organizations; thus creating uncertainties and areas of conflict. Tax declarations, together with other legal compliance areas (as examples, customs and currency control matters) are subject to review and investigation by a number of authorities, which are enabled by law to impose severe fines, penalties and interest charges. These facts create tax risks in Kazakhstan substantially more significant than typically found in countries with more developed tax systems.

Commercial legislation of the Republic of Kazakhstan, including tax legislation, may allow more than one interpretation. In addition, there is a risk of tax authorities making arbitrary judgments of business activities. If a particular treatment, based on Management's judgment of the Bank's business activities, was to be challenged by the tax authorities, the Bank may be assessed additional taxes, penalties and interest.

Such uncertainty may relate to the valuation of financial instruments and the market pricing of deals. Additionally, such uncertainty may relate to the valuation of temporary differences on the provision and recovery of the provision for impairment losses on loans to customers and receivables, as an underestimation of the taxable profit. The management of the Bank believes that it has accrued all tax amounts due and therefore no allowance has been made in the separate financial statements.

In Kazakhstan tax years remain open to review by the tax authorities for five years. However, tax authorities may perform additional reviews, if considered necessary. In accordance with judicial rulings, the period of review can be altered, if the court acknowledges the fact of interdiction to conducting the tax review by the tax authorities.

Management believes that the Bank is in compliance with the tax law affecting its operations; however, the risk that relevant authorities could take differing positions with regard to interpretive issues remains.

Movements in net deferred tax liability:

	2019	2018
Net deferred tax liability at the beginning of the year	64,712	8,086
Deferred tax (benefit)/expense	(20,458)	56,571
Credited to other comprehensive income at the date of property and	. , ,	•
equipment revaluation	18	55
Net deferred tax liability at the end of the year	44,272	64,712

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

23. Other liabilities

Other liabilities comprise:

	31 December 2019	31 December 2018
Liability arising from continuing involvement	26,167	952
Salary, bonuses and vacation accrual	14,698	14,021
Other prepayments received	7,573	3,355
Taxes payable other than income tax	4,139	4,316
Lease liabilities	3,307	-
Payable for general and administrative expenses	2,020	1,370
Creditors on non-banking activities	1,615	1,653
Creditors on bank activities	91	1,089
Other	36	376
Total other liabilities	59,646	27,132

Liability arising from continuing involvement represents obligations to JSC Mortgage Organization "Baspana" ("Operator") related to the state mortgage program "7-20-25" and other programs. In accordance with the conditions of this program, the Bank provides mortgage loans to borrowers and transfers rights of claim on loans to the Program Operator. In accordance with the program and trust management agreement, the Bank carries out trust management of transferred mortgage loans. The Bank is obliged to repurchase the rights of claims on transferred mortgage loans, when the loan principal amount and interest has an overdue of 90 days. Reverse repurchase is performed at the loan nominal value.

The Bank has determined that it neither transfers nor retains substantially all the risks and rewards of ownership of the financial asset transferred; however, the Bank has determined that it retains control over the assets transferred and continues recognizing thereof to the extent of continuing involvement in the assets transferred. The extent of the Bank's continuing involvement is limited to maximum amount of the consideration received, that the Bank has to return as the Bank's continuing involvement takes a form of the guarantee on the asset transferred. As the Bank continues to recognize the asset to the extent of its continuing involvement in loans to customers, the Bank also recognizes the associated liability. As at 31 December 2019 and 2018, principal amount of these loans issue were KZT 26,167 million and KZT 952 million, respectively.

24. Equity

The number of shares authorized, issued and fully paid as at 31 December 2019 and 2018 were as follows:

31 December 2019	Share capital authorized	Share capital authorized and not issued	Fully paid and issued share capital	Share capital repurchased	Outstanding shares
Common	25,000,000,000	(11,552,455,218)	13,447,544,782	(1,693,495,385)	11,754,049,397
31 December 2018	Share capital authorized	Share capital authorized and not issued	Fully paid and issued share capital	Share capital repurchased	Outstanding shares
Common	25.000.000.000	(11.552.455.218)	13.447.544.782	(1.693.490.385)	11.754.054.397

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

All shares are KZT denominated. Movements of shares outstanding are as follows:

	Number of shares Common	Nominal (placement) amount Common
31 December 2017	10,995,467,774	40,738
Issue of common shares Purchase of treasury shares	758,687,723 (101,100)	65,332 (6)
31 December 2018	11,754,054,397	106,064
Issue of common shares Purchase of treasury shares	- (5,000)	- -
31 December 2019	11,754,049,397	106,064

Common shares

As at 31 December 2019 and 2018, share capital comprised KZT 212,690 million and KZT 212,690 million. As at 31 December 2019, the Bank held 1,693,495,385 of the Bank's common shares as treasury shares at KZT 106,626 million (31 December 2018 – 1,693,490,385 common shares at KZT 106,626 million).

Each common share outstanding is entitled to one vote and dividends. Treasury shares are not entitled to any vote or dividend.

Dividends paid for the previous financial years were as follows:

	Paid in 2019	Paid in 2018
	for the year	for the year
	ended	ended
	31 December	31 December
	2018	2017
Dividend paid per one common share	10.78	6.31

Share premium reserve

Share premium reserve represents an excess of contributions received over the nominal value of shares issued.

25. Financial commitments and contingencies

The Bank's financial commitments and contingencies comprise the following:

	31 December 2019	31 December 2018
Guarantees issued	397,567	410,695
Commercial letters of credit	67,532	66,348
Commitments to extend credit	36,971	43,739
Financial commitments and contingencies	502,070	520,782
Less: cash collateral against letters of credit	(31,637)	(30,057)
Less: provisions (Note 21)	(3,859)	(2,094)
Financial commitments and contingencies, net	466,574	488,631

Guarantees issued represent bank guarantees issued by the Bank by order of its clients, and which are in effect as at the reporting date. As at 31 December 2019, the ten largest guarantees accounted for 60% of the Bank's total financial guarantees (31 December 2018 - 68%) and represented 19% of the Bank's total equity (31 December 2018 - 27%).

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Commercial letters of credit represent letters of credit issued by the Bank by order of its clients, and under which as at the reporting date, the payment has not yet been made. As at 31 December 2019, the ten largest unsecured letters of credit accounted for 53% of the Bank's total commercial letters of credit (31 December 2018 – 55%) and represented 3% of the Bank's total equity (31 December 2018 – 4%).

The Bank requires collateral to support credit-related financial instruments when it is deemed necessary. The Bank typically requires collateral support unless it is determined to be not necessary through review of the credit risk of the borrower or analysis of other deposit accounts held by the Bank. Collateral held varies, but may include deposits held in the banks, government securities and other assets.

Capital commitments

As at 31 December 2019 and 2018, the Bank had commitments for capital expenditures in respect of construction in progress for KZT nil.

Operating lease commitments

There were no material operating lease commitments under irrevocable operating leases outstanding as at 31 December 2019 and 2018.

26. Net interest income

	Year ended 31 December 2019	Year ended 31 December 2018
Interest income:		
Loans to customers	448,159	426,501
Financial assets at fair value through other comprehensive income Debt securities at amortised cost, net of allowances for expected credit	102,533	97,165
losses	93,914	93,041
Amounts due from credit institutions and cash and cash equivalents	34,532	31,677
Other financial assets	6,109	5,614
Total interest income	685,247	653,998
Interest expense:		
Amounts due to customers	(213,112)	(242,403)
Debt securities issued	(97,120)	(83,399)
Amounts due to credit institutions	(4,048)	(3,809)
Other interest expense	(3,174)	-
Other financial liabilities	(287)	
Total interest expense	(317,741)	(329,611)
Net interest income before credit loss expense	367,506	324,387

The total interest income calculated using the EIR method for financial assets at FVTOCI is KZT 102,533 million during the year 2019 (year 2018: KZT 97,165 million) and for financial assets measured at amortised cost is KZT 582,714 million during the year 2019 (year 2018: KZT 556,833 million). The total interest expense calculated using the EIR method for financial liabilities measured at amortised cost is KZT 317,741 million during the year 2019 (year 2018: KZT 329,611 million).

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

27. Fees and commissions

Fee and commission income was derived from the following sources:

	Year ended 31 December 2019	Year ended 31 December 2018
Plastic cards operations	62,937	60,655
Bank transfers – settlements	14,947	16,194
Cash operations	10,834	11,621
Letters of credit and guarantees issued	9,588	6,916
Servicing customers' pension payments	8,122	8,037
Bank transfers – salary projects	6,925	7,200
Maintenance of customer accounts	3,226	3,958
Other	1,226	1,848
	117,805	116,429

Fee and commission expense comprised the following:

	Year ended 31 December 2019	Year ended 31 December 2018
Payment cards	(37,067)	(27,169)
Deposit insurance	(10,080)	(10,959)
Bank transfers	(1,258)	(1,227)
Foreign currency operations	(1,094)	(2,339)
Commission paid to collectors	(314)	(482)
Other	(2,216)	(1,605)
	(52,029)	(43,781)

Detailed amounts of "Fee and commission income" and "Fee and commission expense" for the year ended 31 December 2018 have been reclassified for consistency with the current year presentation.

The Bank changed the presentation of fee and commission income for the year ended 31 December 2019, i.e. commission income on "Payment card maintenance" was changed to commission income on "Plastic cards operations". Therefore, fee and commission income and expense for the year ended 31 December 2018 was changed respectively, within the detailed lines in the note above. The management of the Bank believes that the current presentation reflects appropriately the sources of commission income.

This reclassification had no effect on the Bank's reported net fee and commission income in the separate financial statements for the year ended 31 December 2018.

28. Net (loss)/gain from financial assets and liabilities at fair value through profit or loss

Net (loss)/gain from financial assets and liabilities at fair value through profit or loss comprises:

	Year ended 31 December	Year ended 31 December
	2019	2018
Net (loss)/gain from operations with financial assets and liabilities classified as held for trading:		
Unrealized net (loss)/gain on derivative and trading operations*	(20,056)	97,657
Realized net (loss)/gain on derivative operations	(1,499)	12,812
Total net (loss)/gain from operations with financial assets and liabilities classified as held for trading	(21,555)	110,469

^{*}The unrealised gain on derivative and trading operations in 2018 refers mainly to swap agreements with NBRK for which the fair value increased significantly due to the depreciation of the USD to KZT exchange rate.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

29. Net foreign exchange gain/(loss)

Net foreign exchange gain/(loss) comprises:

	Year ended 31 December 2019	Year ended 31 December 2018
Dealing, net	35,797	31,031
Translation differences, net	7,953	(98,132)
Total net foreign exchange gain/(loss)	43,750	(67,101)

30. Operating expenses

Operating expenses comprised:

	Year ended 31 December 2019	Year ended 31 December 2018
Salaries and other employee benefits	55,816	55,260
Depreciation and amortization expenses	9,435	9,357
Repair and maintenance	6,487	5,931
Collection expenses	5,947	5,601
Taxes other than income tax	5,925	6,195
Information services	4,159	3,972
Communication	4,026	3,830
Security	3,953	3,813
Advertisement and loyalty program	3,713	1,651
Rent	2,639	4,619
Utilities	2,599	2,735
Charity	1,998	999
Stationery and office supplies	1,461	1,659
Professional services	1,081	1,152
Business trip expenses	724	633
Social events	226	166
Hospitality expenses	208	119
Transportation	183	273
Impairment on investments in subsidiaries	160	4,034
Other	1,792	2,021
	112,532	114,020

31. Earnings per share

Basic and diluted earnings per share are calculated by dividing the net income for the year attributable to equity holders of the Bank by the weighted average number of participating shares outstanding during the year.

According to Kazakhstan legislation on Joint Stock Companies, dividend payments per common share cannot exceed the dividends per share on preferred shares for the same period. Therefore, net income for the period is allocated to the ordinary shares and the preferred shares in accordance with their legal and contractual dividend rights to participate in undistributed earnings.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

The following table presents basic and diluted earnings per share:

	Year ended 31 December 2019	Year ended 31 December 2018
Basic and diluted earnings per share Net income for the year attributable to equity holders of the parent	314,644	281,528
Earnings attributable to common shareholders	314,644	281,528
Weighted average number of common shares for the purposes of basic and diluted earnings per share	11,753,749,919	11,324,603,516
Basic and diluted earnings per share (in Kazakhstani Tenge)	26.77	24.86

As required by KASE rules for listed companies the book value of one share per each class of shares as at 31 December 2019 and 2018, is disclosed as follows:

		31	December 2019
Class of shares	Outstanding shares	Equity (as calculated per KASE rules)	Book value of one share, in KZT
Common	11,754,049,397	1,242,407	105.70
		1,242,407	
		31	December 2018
Class of shares	Outstanding shares	Equity (as calculated per KASE rules)	Book value of one share, in KZT
Common	11,754,054,397	1,019,117	86.70
		1,019,117	

Equity attributable to common shares is calculated as the difference between total equity and total net book value of intangible assets.

The management of the Bank believes that it fully complies with the requirement of KASE as at the reporting dates.

32. Financial risk management

Risk management is fundamental to the Bank's banking business and is an essential element of the Bank's operations. The main risks inherent to the Bank's operations are those related to:

- Credit risk
- Liquidity risk
- Market risk

The Bank recognizes that it is essential to have efficient and effective risk management processes in place. To enable this, the Bank has established a risk management framework, whose main purpose is to protect the Bank from risk and allow it to achieve its performance objectives. Through the risk management framework, the Bank manages the following risks:

Credit risk

Credit risk is the risk of loss arising for the Bank when a counterparty is unable to meet its contractual obligations on time or in full.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

The risk management division plays an important role in managing and controlling the credit risk. This division is responsible for credit risk identification, evaluation and implementation of control and monitoring measures. The risk management division directly participates in credit decision-making processes and the consideration of internal rules, regulations and loan programs. In addition, the division provides independent recommendations concerning credit exposure minimization measures, controls limits and monitors credit risks, provides relevant reporting to management and ensures compliance of the credit process with external laws/regulations as well as internal requirements and procedures.

The Bank structures the level of credit risk it undertakes by placing limits on the amount of risk accepted in relation to one borrower/counterparty, or groups of borrowers, and to industry (and geographical) segments. Limits on the level of credit risk concentration by industry sector are approved and controlled by the Assets and Liabilities Management Committee ("ALMC"). Limits on credit risk exposure with respect to credit programmes (Small and medium enterprises ("SME") and retail) are approved by the Management Board. The exposure to any one borrower, including banks and brokers, covers on and off-balance sheet exposures, which are reviewed by the Credit Committees and the ALMC. Actual exposures against limits are monitored daily.

The risk, that the counterparty will not meet its obligations, is restricted by the limits covering on and off-balance sheet exposure.

Commitments to extend credit represent unused portions of credit in the form of loans, guarantees or letters of credit. The credit risk for off-balance sheet financial instruments is defined as a probability of losses due to the inability of counterparty to comply with the contractual terms and conditions. With respect to credit risk on commitments to extend credit, the Bank is potentially exposed to a loss in an amount equal to the total unused commitments. However, the likely amount of the loss is less than the total unused commitments since most commitments to extend credit are contingent upon counterparties maintaining specific credit standards. The Bank applies the same credit policy to the contingent liabilities as it does to the financial instruments recorded in the statement of financial position(i.e. the policy based on the procedures for approving the grant of loans, using limits to mitigate the risk, and current monitoring). The Bank monitors the term to maturity of off-balance sheet contingencies, as longer term commitments generally have a greater degree of credit risk than shorter term commitments.

Structure and authorities of credit committees

Credit committees, the ALMC, the Management Board and the Board of Directors are credit authorities responsible for the implementation of the Bank's Credit Policy and credit decision-making process.

Head Office Credit Committee ("CC")

The primary goal of the CC is the implementation of the Bank's Credit Policy in terms of credit operations and credit applications from corporate customers.

Branch Credit Committee and Branch Network Credit Committee ("BCC", "BNCC")

The primary goal of the BCC and the BNCC is the implementation of the Bank's Credit Policy in terms of granting financial instruments via branches to SME customers.

Delegated credit authority limits for the BCC and the BNCC are established by the Management Board. The BCC makes credit decisions within its limits. If the loan application exceeds the relevant credit limit or the authorities of the BCC, the final decision has to be taken by the BNCC. The procedure of the decision-making by the BNCC involves consideration of a package of documents, including complex analysis and assessments of the potential borrowers conducted by the Bank's experts.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Retail Branch Credit Committee of the Head Office ("RCCHO") and Decision Making Center ("DMC")

The primary goal of the RCCHO and the DMC, which are credit authorities, is the implementation of the Bank's Credit Policy in terms of granting retail financial instruments via branches.

The DMC is comprised of credit underwriters with delegated credit authorities based on a four eyes principle. The DMC makes credit decisions within their authorities and limits established by the Management Board and the RCCHO. The RCCHO is authorized to consider loan applications that exceed relevant credit limits or the authorities of the DMC, as well as other matters within the authorities established by the Management Board.

Along with the process of decision making via the credit decision authorities mentioned above, there is an automated approach of decision-making process for potential borrowers whose income can be confirmed by the Independent Government body. This approach takes into account the risk profile of the potential borrower and allows minimizing the credit risk exposure in the decision making process.

Decision Making Center for Small Business ("DMC for SB")

The DMC for SB was established in 2018, the main task of which is to consider loan applications in the small business sector in an amount not exceeding KZT 75 million.

The DMC for SB consists of credit underwriters with delegated decision-making powers based on the four-eye principle. The Decision Making Center takes decisions within the framework of the authority approved by the Board of the Bank and the limits approved by the BNCC.

Problem loans committee of the Head Office, branches

The primary goal of the problem loans committee of the Head Office, branches is the implementation of the Bank's Credit Policy in terms of management, servicing and maintaining the repayment of the problem loans.

Authorized credit authorities of the Bank's subsidiaries

Consideration and approval of the loan applications in the subsidiaries are performed by the authorized credit authorities in accordance with the internal rules and regulations of the subsidiary. Loan applications exceeding the established limits and authorities have to be approved by the Board of Directors of the subsidiaries with the preliminary consideration by the relevant credit committee according to the Bank's internal rules and regulations.

ALMC

The primary goal of the ALMC is profit maximization and to limit the risks of banking activities related to raising and allocating funds and the establishment of a medium-term policy for the management of assets and liabilities. The main tasks of the ALMC are: liquidity management, interest rate risk management, price risk and other banking risk management.

The ALMC is also responsible for establishing country and counterparty-bank limits. The ALMC reports to the Board of Directors.

The Management Board

For loan applications exceeding the authorities of the Head Office Credit Committee, the BNCC and the RCCHO, or exceeding the relevant limits of the BNCC and the RCCHO, have to be considered by the Management Board.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

The Board of Directors

If the loan application exceeds 5% of the Bank's equity capital or the potential borrower is a related party, such applications have to be considered by the Board of Directors.

Maximum Exposure

The Bank's maximum exposure to credit risk varies significantly and is dependent on both individual risks and general market risks.

The following table presents the maximum exposure to credit risk of financial assets and contingent liabilities. For financial assets the maximum exposure equals to a carrying value of those assets prior to any offset or collateral. For financial guarantees and other contingent liabilities the maximum exposure to credit risk is the maximum amount the Bank would have to pay if the guarantee was called on or in the case of commitments, if the loan amount was called on (Note 25). The collateral pledged is represented by the carrying amount of a financial instrument for which the collateral was received as security.

	31 December 2				
	Maximum exposure and net exposure after offset	Collateral pledged			
Cash equivalents*	1,429,150	37,516			
Financial assets at fair value through profit or loss	4,653	· -			
Amounts due from credit institutions	110,409	=			
Financial assets at fair value through other					
comprehensive income	1,545,893	-			
Debt securities at amortised cost, net of allowance					
for expected credit losses	1,199,253	-			
Loans to customers	3,741,287	3,274,191			
Other financial assets	59,755	-			
Commitments and contingencies	498,211	31,637			

	31	December 2018
	Maximum exposure and net exposure after offset	Collateral pledged
Cash equivalents* Financial assets at fair value through profit or loss	1,497,703 97,927	18,904
Amounts due from credit institutions	93,493	-
Financial assets at fair value through other comprehensive income Debt securities at amortised cost, net of allowance	1,699,468	-
for expected credit losses	1,044,939	-
Loans to customers Other financial assets	3,443,755 54,107	3,068,473
Commitments and contingencies	518,688	30,057

^{*}Amount represents the short-term loans and deposits with original maturities of not more than 90 days, which are included within cash and cash equivalents in the statement of financial position.

As at 31 December 2019 and 2018, there is no any difference between maximum exposure and net exposure after offset.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Significant increase in credit risk

As explained in Note 4, the Bank monitors all financial assets that are subject to impairment requirements to assess whether there has been a significant increase in credit risk since initial recognition. If there has been a significant increase in credit risk, the Bank will measure the loss allowance based on lifetime rather than 12-month ECL.

The Bank uses credit risk grades as a primary input into the determination of the term structure of the PD for exposures. The Bank collects performance and default information about its credit risk exposures analyzed by jurisdiction or region and by type of product and borrower as well as by credit risk grading. The information used is both internal and external depending on the portfolio assessed.

The Bank uses different criteria to determine whether credit risk has increased significantly per portfolio of assets. The criteria used are both quantitative changes in PDs as well as qualitative.

For treasury operations (interbank transactions, securities, reverse repurchase agreements), a significant increase in credit risk is determined individually for each financial asset on the basis of quantitative indicators (rating downgrades by 3 or more steps since initial recognition, overdue by 1 day or more since initial recognition) and qualitative indicators (negative information relating to the issuer/counterparty, including deterioration of financial condition, change of shareholders, the realization of the risk of loss of reputation, the systematic violation of prudential standards).

For bank loans assessed on a collective basis, a significant increase in credit risk is determined for loans with an overdue of over 30 days since initial recognition, for loans assessed on an individual basis - additionally in case of the decrease of internal credit rating and increase in lifetime PD on 10 percentage points in accordance with the internal rating model (the presence of restructuring during deterioration of the financial position for classification to Stage 3), expert opinions of the Bank's specialists based on the changes in the qualitative and quantitative indicators of the borrower, a significant deterioration of collateral and other objective evidence of significant financial difficulties since initial recognition.

Stage 3 is determined for loans that are assessed on a collective basis with an overdue of over 60-90 days, for loans assessed on an individual basis - over 60 days past due, restructuring related to the deterioration of financial condition, deterioration of the internal credit rating and expert opinion of the Bank's specialists.

The Bank considers that certain financial instruments with low credit risk at the reporting date, have not experienced a significant increase in credit risk. The Bank applies this policy to financial instruments issued to sovereign and financial institutions only. The Bank considers a financial instrument to have low credit risk when their external credit risk rating is equivalent to definition of 'investment grade' by international rating agencies.

The Bank has monitoring procedures in place to make sure that the criteria used to identify significant increases in credit are effective, meaning that significant increase in credit risk is identified before the exposure is defaulted or when the asset becomes 30 days past due.

Incorporation of forward-looking information

The Bank uses forward-looking information that is available without undue cost or effort in its assessment of significant increase of credit risk as well as in its measurement of ECL.

The incorporation of forward-looking elements reflects the expectations of the Bank and involves the creation of two scenarios ("base case" and "downside" scenarios), including an assessment of the probability for each scenario. The purpose of using multiple scenarios is to model the non-linear impact of assumptions about macroeconomic factors on the expected credit losses. The "base case" scenario enters with a probability of 75% and the "downside" scenario with a probability of 25%.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

Development of forecasting was carried out by JSC Halyk Finance using internal and external information for creating "base case" and "downside" scenarios of future forecasting of relevant economic variables along with a representative range of other possible forecast scenarios. The external information used includes economic data and forecasts published by governmental bodies and monetary authorities.

The Bank applies probabilities to the forecast scenarios identified. The base case scenario is the single most-likely outcome and consists of information used by the Bank for strategic planning and budgeting. The Bank has identified and documented key drivers of credit risk and credit losses for each portfolio of financial instruments and, using a statistical analysis of historical data, has estimated relationships between macro-economic variables and credit risk and credit losses.

In relation to the sensitivity, within the implementation of specified stress factors, the results of the stress testing demonstrate the deterioration of the Bank's financial indicators (growth of allowances for expected credit losses, decrease of net profit and outflow of amounts due to customers).

At the same time, given that, the Bank has a sufficient amount of equity and liquid assets, significant deterioration in the financial position of the Bank and violation of regulatory requirements and norms are not predicted.

In general, a worsening of forecasted macroeconomic variables for each scenario or an increase in the probability of the "downside" scenario occurring will both increase the number of loans migrating from Stage 1 to Stage 2 and increase the estimated allowances for expected credit losses. In contrast, an improvement in the outlook on forecasted macroeconomic variables or an increase in the probability of the "base case" scenario occurring will have a positive impact. It is not possible to meaningfully isolate the impact of changes in the various macroeconomic variables for a particular scenario due to the interrelationship between the variables as well as the interrelationship between the level of pessimism inherent in a particular scenario and its probability of occurring.

The table below summarizes the principal macroeconomic indicators included in economic scenarios as at 31 December 2019 and 2018 for Kazakhstan, which is the country where the Bank operates and therefore is the country that has a material impact in ECLs.

	31 D	ecember 2019	31 December 2018		
List of macro variables used	Definition	Range	Definition	Range	
		Between 2.4%		Between 1.0%	
Real GDP growth	% change	and 3.6%	% change	and 3.3%	
		Between 5.8%		Between 6.5%	
Inflation	Inflation %	and 10.4%	Inflation %	and 9.0%	
	E	Between USD 45		Between USD 45	
Oil price (USD/bbl)	Price per barrel	and USD 55	Price per barrel	and USD 60	

Financial assets are graded according to the current credit rating they have been issued by an international rating agency or in accordance with the Bank's internal rating system. The highest possible rating is AAA. Investment grade financial assets have ratings from AAA to BBB. Financial assets which have ratings lower than BBB are classified as speculative grade.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

The following table details the credit ratings of financial assets held by the Bank (except for loans to customers, which are disclosed in details below), before any allowances for expected credit losses:

						Not	31 December 2019
	AA	AA-	A	BBB	<bbb< th=""><th>rated</th><th>Total</th></bbb<>	rated	Total
Cash and cash							
equivalents*	247,538	218,585	191,990	705,958	37,663	27,430	1,429,164
Obligatory reserves Financial assets at fair value through profit	-	-	-	133,033	-	-	133,033
or loss Amounts due from	-	-	78	4,401	12	162	4,653
credit institutions Financial assets at fair value through other comprehensive	-	6,445	6,363	38,572	-	59,230	110,610
income Debt securities at	342,889	15,287	47,820	1,045,106	89,963	4,828	1,545,893
amortised cost	_	_	_	1,046,755	_	153,036	1,199,791
Other financial assets	-	_	-	-	-	75,795	75,795
Commitments and							
contingencies	-	-	-	-	-	502,070	502,070
							31 December
				DDD	∠ DDD	Not	2018
Cook and cook	AA	AA-	А	ВВВ	<bbb< td=""><td>Not rated</td><td></td></bbb<>	Not rated	
Cash and cash						rated	2018 Total
equivalents*	AA 154,798	AA- 73,652	18,155	1,205,663	<bbb< b=""> 23,749</bbb<>		2018 Total
equivalents* Obligatory reserves Financial assets at fair						rated	2018 Total
equivalents* Obligatory reserves Financial assets at fair value through profit		73,652 -		1,205,663 105,856	23,749 -	21,693	2018 Total 1,497,710 105,856
equivalents* Obligatory reserves Financial assets at fair value through profit or loss				1,205,663		rated	2018 Total
equivalents* Obligatory reserves Financial assets at fair value through profit or loss Amounts due from		73,652 - 2,356		1,205,663 105,856 95,364	23,749 -	21,693 - 186	2018 Total 1,497,710 105,856 97,927
equivalents* Obligatory reserves Financial assets at fair value through profit or loss Amounts due from credit institutions Financial assets at fair value through other		73,652 -		1,205,663 105,856	23,749 -	21,693	2018 Total 1,497,710 105,856
equivalents* Obligatory reserves Financial assets at fair value through profit or loss Amounts due from credit institutions Financial assets at fair value through other comprehensive income		73,652 - 2,356		1,205,663 105,856 95,364	23,749 -	21,693 - 186	2018 Total 1,497,710 105,856 97,927
equivalents* Obligatory reserves Financial assets at fair value through profit or loss Amounts due from credit institutions Financial assets at fair value through other comprehensive income Debt securities at	154,798 - - -	73,652 - 2,356		1,205,663 105,856 95,364 19	23,749 - 21 -	21,693 - 186 83,861	2018 Total 1,497,710 105,856 97,927 93,830 1,699,468
equivalents* Obligatory reserves Financial assets at fair value through profit or loss Amounts due from credit institutions Financial assets at fair value through other comprehensive income Debt securities at amortised cost	154,798 - - -	73,652 - 2,356		1,205,663 105,856 95,364 19	23,749 - 21 -	186 83,861 9,211	2018 Total 1,497,710 105,856 97,927 93,830 1,699,468 1,045,357
equivalents* Obligatory reserves Financial assets at fair value through profit or loss Amounts due from credit institutions Financial assets at fair value through other comprehensive income Debt securities at	154,798 - - -	73,652 - 2,356		1,205,663 105,856 95,364 19	23,749 - 21 -	21,693 - 186 83,861	2018 Total 1,497,710 105,856 97,927 93,830 1,699,468

^{*}Amount represents the short-term loans and deposits with original maturities of not more than 90 days, which are included within cash and cash equivalents in the statement of financial position.

The banking industry is generally exposed to credit risk through its financial assets and contingent liabilities. Credit risk exposure of the Bank is concentrated within the Republic of Kazakhstan. The exposure is monitored on a regular basis to ensure that the credit limits and credit worthiness guidelines established by the Bank's risk management policy are not breached.

Loans to customers are classified based on internal assessments and other analytical procedures. The respective business units classify loans according to their risk and the exposure that they potentially present to the Bank, and this classification is verified by the Risk Management function.

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

The Bank is using an internal rating model to classify loans in different risk categories. After the occurrence of an impairment event, the model assists in estimating the allowances for expected credit losses based on a borrowers' financial performance, credit history, quality of accounts receivable, liquidity of the borrower, market risks relating to the borrower, industry of the borrower and other factors. Periodically, the required information is inputted into the model by credit analysts. Information input into the system and the estimate of the allowance for loan loss is verified by the risk management department.

The following classifications are used by the rating model:

- Rating score 1 superior loan rating, minimal credit risk;
- Rating score 2 very high quality of loan, very low credit risk;
- Rating score 3 high quality of loan, low credit risk;
- Rating score 4 satisfactory quality of loan, insignificant risk;
- Rating score 5 credit risk can increase at economic variation;
- Rating score 6 high risk at economic variation;
- Rating score 7 high risk of default, paying capacity of the borrower depends on favourable economic circumstances;
- Rating score 8 10 very high risk of default/default.

Pools of homogeneous loans – loans to customers are included in groups of loans with similar credit risk characteristics (i.e. the characteristics include sector of the economy, borrower activities, type of loan program, level of defaults, internal ratings and other factors). Pools of homogeneous loans include assets that have been assessed collectively.

An analysis of the Bank's credit risk exposure per class of financial asset, internal rating and "stage" without taking into account the effects of any collateral or other credit enhancements is provided in the following table. Unless specifically indicated, for financial assets, the amounts in the table represent gross carrying amounts.

_				31 Dece	mber 2019
	Stage 1	Stage 2	Stage 3		
	12-month	Lifetime	Lifetime		
Rating Score	ECL	ECL	ECL	POCI	Total
1-3	-	_	-	-	_
4	298,985	-	-	-	298,985
5	986,590	12,513	-	-	999,103
6	577,347	65,042	27,340	14,572	684,301
7	39,419	61,792	131,566	1,626	234,403
8-10	-	-	126,547	49,548	176,095
Not rated	13,311		105,665	5,197	124,173
Loans to corporate customers that are individually assessed for impairment Loans to SME customers and retail	1,915,652	139,347	391,118	70,943	2,517,060
business that are individually assessed for impairment Loans to customers that are	323,420	8,518	47,697	11,345	390,980
collectively assessed for impairment	996,909	4,191	198,000	724	1,199,824
	3,235,981	152,056	636,815	83,012	4,107,864
Less – Allowances for expected credit losses (Note 21)	(36,077)	(45,194)	(270,799)	(14,507)	(366,577)
Loans to customers	3,199,904	106,862	366,016	68,505	3,741,287

21 Dansunhau 2010

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

				31 Dece	mber 2018
Rating Score	Stage 1 12-month ECL	Stage 2 Lifetime ECL	Stage 3 Lifetime ECL	POCI	Total
1-3	58,588	_	-	-	58,588
4	185,482	-	-	-	185,482
5	791,056	8,898	469	-	800,423
6	548,998	21,140	5,733	14,391	590,262
/	231,223	70,653	155,650	6,633	464,159
8-10	-	-	126,059	55,339	181,398
Not rated	-	-	75,122	7,627	82,749
Loans to corporate customers that are individually assessed for impairment Loans to SME customers and retail business that are individually	1,815,347	100,691	363,033	83,990	2,363,061
assessed for impairment Loans to customers that are	397,766	13,408	103,505	15,627	530,306
collectively assessed for impairment	732,898	5,652	178,566	-	917,116
	2,946,011	119,751	645,104	99,617	3,810,483
Less – Allowances for expected credit	(20.272)	(25 521)	(206,020)	(15.006)	(266.720)
losses (Note 21)	(39,273)	(25,521)	(286,928)	(15,006)	(366,728)
Loans to customers	2,906,738	94,230	358,176	84,611	3,443,755

Analysis by credit quality of loans to retail business and SME customers that are collectively and individually assessed for impairment as at 31 December 2019 and 2018 is as follows:

		Allowances for expected	
As at 31 December 2019	Gross loans	credit losses	Net loans
Loans to retail business			
Not past due	865,616	(29,474)	836,142
Overdue:	•	• • •	
up to 30 days	21,756	(3,624)	18,132
31 to 60 days	3,908	(1,085)	2,823
61 to 90 days	2,964	(1,005)	1,959
91 to 180 days	7,476	(4,178)	3,298
over 180 days	81,251	(46,624)	34,627
Loans to retail business that are collectively and			
individually assessed for impairment	982,971	(85,990)	896,981
Loans to SME customers			
Not past due	511,665	(12,867)	498,798
Overdue:			
up to 30 days	6,304	15	6,319
31 to 60 days	3,090	(304)	2,786
61 to 90 days	1,622	(127)	1,495
91 to 180 days	3,738	(1,661)	2,077
over 180 days	57,744	(28,611)	29,133
Loans to SME customers that are collectively and			
individually assessed for impairment	584,163	(43,555)	540,608
Loans to SME customers and retail business that are collectively and individually assessed for			
impairment	1,567,134	(129,545)	1,437,589
Loans to corporate customers that are collectively and individually assessed for	2 517 061	(221 246)	2 205 715
impairment	2,517,061	(231,346)	2,285,715
Loans related to card transactions	23,669	(5,686)	17,983
Loans to customers	4,107,864	(366,577)	3,741,287

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

A + 24 D 2010	Curren la sur	Allowances for expected	Not leave
As at 31 December 2018	Gross loans	credit losses	Net loans
Loans to retail business			
Not past due	725,324	(28,489)	696,835
Overdue:		(
up to 30 days	34,083	(4,811)	29,272
31 to 60 days	7,923	(2,837)	5,086
61 to 90 days	5,175	(2,230)	2,945
91 to 180 days	10,915	(6,571)	4,344
over 180 days	106,837	(61,339)	45,498
Loans to retail business that are collectively and			
individually assessed for impairment	890,257	(106,277)	783,980
Loans to SME customers			
Not past due	426,232	(6,571)	419,661
Overdue:	44 247	(220)	10.070
up to 30 days	11,217	(339)	10,878
31 to 60 days	5,823	(1,449)	4,374
61 to 90 days	8,141	(3,099)	5,042
91 to 180 days	5,209	(1,194)	4,015
over 180 days	73,684	(38,857)	34,827
Loans to SME customers that are collectively and			
individually assessed for impairment	530,306	(51,509)	478,797
Loans to SME customers and retail business that are collectively and individually assessed for			
impairment	1,420,563	(157,786)	1,262,776
Loans to corporate customers that are collectively and individually assessed for			
impairment	2,363,061	(203,712)	2,159,349
Loans related to card transactions	26,859	(5,230)	21,629
Loans to customers	3,810,483	(366,728)	3,443,755

Notes to the Separate Financial Statements for the Year Ended 31 December 2019 (Continued)

(Millions of Kazakhstani Tenge)

The following table details the carrying value of financial assets that are impaired and for those that are past due but not impaired:

	Financial	assets that have beer	n individually assess	sed for impairment		ets that have been	
	Unimpaired financial assets		Impair	Impaired financial assets		collectively assessed for impairment	
	Gross carrying amount of assets	Amount of allowances for expected credit losses	Gross carrying amount of assets	Amount of allowances for expected credit losses	Gross carrying amount of assets	Amount of allowances for expected credit losses	31 December 2019 Total
Amounts due from credit institutions Financial assets at fair value	110,610	(201)	-	-	-	-	110,409
through other comprehensive income Debt securities at amortized	1,546,413	(520)	-	-	-	-	1,545,893
cost Loans to customers Other financial assets	1,199,791 2,386,939 -	(538) (52,063) -	521,101 69,581	(206,825) (13,093)	1,199,824 6,214	(107,689) (2,947)	1,199,253 3,741,287 59,755
	Financial	assets that have beer	n individually assess	sed for impairment		ets that have been	
	Unimpaire	ed financial assets	Impair	ed financial assets	collect	tively assessed for impairment	
	Gross carrying amount of assets	Amount of allowances for expected credit losses	Gross carrying amount of assets	Amount of allowances for expected credit losses	Gross carrying amount of assets	Amount of allowances for expected credit losses	31 December 2018 Total
Amounts due from credit institutions Financial assets at fair value through other	93,830	(337)	-	-	-	-	93,493
comprehensive income	1,699,999	(531)	-	-	-	-	1,699,468
Debt securities at amortized cost Loans to customers Other financial assets	1,045,357 2,211,618 -	(418) (31,995)	- 462,648 46,729	(159,846) (8,321)	- 1,136,217 15,699	- (174,887) -	1,044,939 3,443,755 54,107

As at 31 December 2019, the carrying amount of unimpaired overdue loans was KZT 23,463 million (31 December 2018 – KZT 35,640 million). Maturities of these overdue loans are not greater than 90 days.

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

Liquidity risk

Liquidity risk is the risk resulting from the inability of the Bank to provide funds for repayment of its obligations in due time. The Bank's liquidity risk arises when terms of assets on active operations and maturity dates of obligations do not match.

Short-term liquidity needs are managed by the Bank's Treasury function collecting daily cash inflow/outflow forecasts. Long-term liquidity management is performed by the ALMC by analyzing longer term liquidity positions and making decisions on managing significant gaps through various available means.

In order to manage liquidity risk, the Bank analyzes the financial assets and liabilities, and obligatory reserves taking into account payment schedules for loans issued to customers. The following tables provide an analysis of financial assets and liabilities grouped on the basis of the remaining period from the reporting date to the earliest of the contractual maturity date or available maturity date, except for financial assets at fair value through profit or loss in the form of securities, which are included in the column "Less than 1 month" as they are available to meet the Bank's short-term liquidity needs.

Notes to the financial statements (continued) For the year ended 31 December 2019 (Millions of Kazakhstani Tenge)

	Less than		3 months to			31 December
	1 month	1 to 3 months	3 months to 1 year	1 to 5 years	Over 5 years	2019 Total
FINANCIAL ASSETS:			-		-	
Cash and cash equivalents	1,598,199	1,493	-	-	-	1,599,692
Obligatory reserves	81,412	8,084	39,259	3,990	288	133,033
Financial assets at fair value through profit or	,	,	,	,		,
loss	4,653	-	-	-	-	4,653
Amounts due from credit institutions	17,873	159	32,076	32,709	27,592	110,409
Financial assets at fair value through other			·	•		·
comprehensive income	88,955	217,932	611,845	340,536	286,625	1,545,893
Debt securities at amortised cost, net of		·	·	•		
allowances for expected credit losses	11,559	1,315	33,448	652,996	499,935	1,199,253
Loans to customers*	254,744	382,403	2,039,119	956,047	108,974	3,741,287
Other financial assets	33,187	723	20,260	5,353	232	59,755
	2,090,582	612,109	2,776,007	1,991,631	923,646	8,393,975
FINANCIAL LIABILITIES:						
Amounts due to customers	2,993,517	356,283	2,002,235	548,728	406,010	6,306,773
Amounts due to credit institutions	141,444	183	1,810	15,818	120,432	279,687
Financial liabilities at fair value through profit or	•		,	,	•	•
loss	19,782	-	-	227	-	20,009
Debt securities issued	13,482	3,785	3,109	599,002	227,483	846,861
Other financial liabilities	32,882	322	29	3	<u> </u>	33,236
	3,201,107	360,573	2,007,183	1,163,778	753,925	7,486,566
Net position	(1,110,525)	251,536	768,824	827,853	169,721	
Accumulated gap	(1,110,525)	(858,989)	(90,165)	737,688	907,409	

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

	Less than		3 months to			31 December 2018
	1 month	1 to 3 months	1 year	1 to 5 years	Over 5 years	Total
FINANCIAL ASSETS:			-		-	
Cash and cash equivalents	1,685,874	-	-	-	_	1,685,874
Obligatory reserves	65,438	7,396	21,505	11,296	221	105,856
Financial assets at fair value through profit or	•	,	,	,		•
loss	498	-	91,263	6,166	-	97,927
Amounts due from credit institutions	12,703	4,286	8,556	37,543	30,405	93,493
Financial assets at fair value through other		·	·	·		
comprehensive income	672,760	262,292	166,478	293,442	304,496	1,699,468
Debt securities at amortised cost, net of		·	·	•		
allowances for expected credit losses	11,678	-	33,802	499,740	499,719	1,044,939
Loans to customers*	242,392	358,077	2,044,533	695,632	103,121	3,443,755
Other financial assets	37,453	159	1,638	14,744	113	54,107
	2,728,796	632,210	2,367,775	1,558,563	938,075	8,225,419
FINANCIAL LIABILITIES:						
Amounts due to customers	3,844,981	367,900	1,385,814	585,048	252,244	6,435,987
Amounts due to credit institutions	38,046	234	3,168	13,498	113,648	168,594
Financial liabilities at fair value through profit or	•		,	,	•	•
loss	2,467	16	4,330	203	-	7,016
Debt securities issued	13,505	3,785	66,798	494,115	323,018	901,221
Other financial liabilities	19,016	376	23	34	12	19,461
	3,918,015	372,311	1,460,133	1,092,898	688,922	7,532,279
Net position	(1,189,219)	259,899	907,642	465,665	249,153	
Accumulated gap	(1,189,219)	(929,320)	(21,678)	443,987	693,140	

^{*} Loans to customers "3 months to 1 year" include loans with non-standard repayment schedule.

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

Assets and liabilities are recorded on the basis of their contractual maturity and payment schedules. The Bank possesses a right to unilaterally call back part of long-term loans provided to customers in ten-months period after proper notification would be issued by the Bank.

A significant portion of the Bank's liabilities is represented by customer term deposits, current accounts of corporate and retail customers and bonds.

Management believes that although a substantial portion of current accounts and customer deposits are on demand and mature in less than one month, diversification of these deposits by number and type of depositors, and the past experience of the Bank indicate that these deposits provide a long-term and stable source of funding for the Bank. Therefore, an essential part of current accounts is considered as stable resources for the purposes of liquidity analysis and management.

A further analysis of the liquidity risk is presented in the following tables in accordance with IFRS 7. The amounts disclosed in these tables do not correspond to the amounts recorded on the statement of financial position as the presentation below includes a maturity analysis for financial liabilities and contingent liabilities based on the remaining contractual payments (including interest payments).

	Up to 1	1 month to 3	3 months	1 year	Over	31 December 2019
	month	months	to 1 year	to 5 years	5 years	Total
FINANCIAL AND CONTINGENT LIABILITIES:						
Amounts due to customers	2,994,559	359,092	2,053,192	617,263	470,518	6,494,624
Amounts due to credit institutions	141,605	183	1,812	17,964	152,115	313,679
Debt securities issued	14,881	4,937	37,642	756,359	246,966	1,060,785
Other financial liabilities	32,882	322	29	3	-	33,236
Guarantees issued	397,567	-	-	-	-	397,567
Commercial letters of credit Commitments to extend credit	67,532 36,971	-	-	-	-	67,532 36,971
Communents to extend credit	30,971					30,971
	3,685,997	364,534	2,092,675	1,391,589	869,599	8,404,394
Derivative financial assets	583,536	_	364,096	29,617	_	977,249
Derivative financial liabilities	604,952	_	388,938	31,202		1,025,092
Derivative infancial habilities	004,552		300,330	31,202		1,023,032
		1 month				31 December
	Up to 1	to 3	3 months	1 year	Over	2018
	month	months	to 1 year	to 5 years	5 years	Total
FINANCIAL AND CONTINGENT LIABILITIES:						
Amounts due to customers	3,846,919	371,288	1,433,389	625,629	368,140	6,645,365
Amounts due to credit institutions	38,047	234	3,175	16,227	146,929	204,612
Debt securities issued	28,366	8,722	116,487	721,030	337,563	1,212,168
Other financial liabilities	19,017	376	23	34	11	19,461
Guarantees issued	410,695	-	-	-	-	410,695
Commercial letters of credit	66,348	-	-	-	-	66,348
Commitments to extend credit	43,739	-	-	-	-	43,739
	4,453,131	380,620	1,553,074	1,362,920	852,643	8,602,388
Derivative financial assets	413,251	700	771,330	44,978	_	1,230,259
Derivative financial liabilities	415,231	700 716	684,600	38,812		1,230,239
Derivative infancial liabilities	713,213	/10	007,000	30,012		1,133,37/

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

Market risk

Market risk is the risk that Bank's earnings or equity or its ability to meet business objectives will be adversely affected by changes in market variables such as interest rates, foreign exchange rates, securities prices and other basic variables.

The Bank is exposed to market risks which include the following components:

- Risk of changes in interest rates (interest rate risk);
- Risk of changes in foreign exchange rates (currency risk);
- Risk of changes in securities prices (price risk).

The objective of market risk management is to optimize risk/return, minimize losses in case of adverse events and decrease deviation of factual financial results from expected financial results.

Market risk management includes security portfolio management and control of open positions on currencies, interest rates and derivatives. For these purposes, the ALMC fixes limits on security portfolios, open positions, stop-loss limits and other limitations. Market risk limits are subject to review at least on an annual basis and should be monitored continuously.

Interest rate risk

The Bank is exposed to interest rate risk. Interest rate risk is defined as the risk of interest income decrease, interest expense increase or a negative impact on equity resulting from adverse changes in market interest rates.

The Bank determines two types of interest rate risk:

- Interest rate risk related to changes in fair values of securities portfolios, which are reflected through equity;
- Interest rate risk resulting from assets and liabilities maturity dates (dates of interest rate repricing) mismatch that are sensitive to interest rate changes (risk of interest rate changes).

The ALMC manages interest rate risks and market risks through the management of the Bank's position on interest rates to reach positive interest margins.

The Bank manages interest rates by determining the Bank's exposure to the interest rate risk using the approach described by the Basel Committee on the principles for the management and supervision of interest rate risk. This approach identifies the Bank's exposure to the interest rate risk by testing the impact of a parallel movement in interest rates on assets and liabilities.

Sensitivity analysis of interest rate risk

The following table presents a sensitivity analysis of interest rate risk, which has been determined based on "reasonably possible changes in the risk variable". The Bank assesses the reasonably possible changes in interest rates in tenge and foreign currencies separately, in which financial assets and liabilities are denominated due to the different volatility of interest rates.

The impact on profit before tax is the effect of the assumed changes in interest rates on the net interest income for one year, based on the floating rate financial assets and liabilities held as at 31 December 2019 and 2018, and the effect of revaluing instruments with fixed rates accounted for at fair value. The management of the Bank believes income tax not to have a substantial effect for the purpose of interest rate risk management.

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

The impact on income before tax based on asset and liability values as at 31 December 2019 and 2018 is as follows:

	31	December 2019	31 December 2018		
	Interest rate KZT +2% CCY +2%	Interest rate KZT -2% CCY -2%	Interest rate KZT +2% CCY +2%	Interest rate KZT -2% CCY -2%	
FINANCIAL ASSETS:					
Financial assets at fair value					
through profit or loss	1,384	(1,360)	(97)	84	
KZT	3,554	(3,554)	6,085	(6,253)	
CCY	(2,170)	2,194	(6,182)	6,337	
Amounts due from credit					
institutions	44	(44)	47	(47)	
KZT	-	-	-	-	
CCY	44	(44)	47	(47)	
Loans to customers	1,159	(1,159)	1,197	(1,197)	
KZT	-	-	-	-	
CCY	1,159	(1,159)	1,197	(1,197)	
FINANCIAL LIABILITIES:					
Amounts due to credit					
institutions	3	(3)	6	(6)	
KZT	-	1-1	-	-	
CCY	3	(3)	6	(6)	
Net impact on income before					
tax	2,584	(2,560)	1,141	(1,154)	

The impact on equity is the effect of the assumed changes in interest rates due to changes in retained earnings and the effect of revaluation of financial assets at fair value through other comprehensive income with fixed rates.

The impact on equity based on asset and liability values as at 31 December 2019 and 2018 is as follows:

	31	December 2019	31 December 2018		
	Interest rate KZT +2% CCY +2%	Interest rate KZT -2% CCY -2%	Interest rate KZT +2% CCY +2%	Interest rate KZT -2% CCY -2%	
FINANCIAL ASSETS:					
Financial assets at fair value					
through profit or loss	1,384	(1,360)	(97)	84	
KZT	3,554	(3,554)	6,085	(6,253)	
CCY	(2,170)	2,194	(6,182)	6,337	
Amounts due from credit	(, ,	•	(, ,	,	
institutions	44	(44)	47	(47)	
KZT	-	-	-	-	
CCY	44	(44)	47	(47)	
Loans to customers	1,159	(1,159)	1,197	(1,197)	
KZT	· -	-	· -	-	
CCY	1,159	(1,159)	1,197	(1,197)	
Financial assets at fair value through other comprehensive					
income	(57,545)	57,545	(52,226)	52,226	
KZT	(15,907)	15,907	(14,976)	14,976	
CCY	(41,638)	41,638	(37,250)	37,250	
FINANCIAL LIABILITIES: Amounts due to credit					
	2	(2)	6	(6)	
institutions <i>KZT</i>	3	(3)	6	(6)	
CCY	3	(3)	- 6	(6)	
Net impact on equity	(54,961)	54,985	(51,085)	51,072	

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

Currency Risk

The Bank is exposed to currency risk. Currency risk arises from open positions in foreign currencies and adverse movements of market exchange rates that may have a negative impact on the financial performance of the Bank.

The ALMC controls currency risk by management of the open currency position based on the estimations of KZT devaluation and other macroeconomic indicators, which gives the Bank an opportunity to minimize losses from significant currency rate fluctuations of national and foreign currencies.

The treasury department performs daily monitoring of the Bank's open currency position with the aim to comply with the requirements of the regulatory authority.

The Bank is exposed to the effects of fluctuation in the prevailing foreign currency exchange rates (primarily USD) on its financial position, results of operations and cash flows, which are monitored daily. ALMC sets limits on the level of exposure by currencies within the authority approved by the Board of Directors. These limits also comply with the minimum requirements of the regulator authority.

The Bank's principal cash flows are generated in KZT and USD. As a result, potential movements in the exchange rate between KZT and USD will affect the carrying values of the Bank's USD denominated monetary assets and liabilities. Currency risk is assessed in relation to the statement of financial position and off-balance sheet positions. The current Bank's sensitivity to fluctuations in exchange rates is acceptable due to the fact that the off balance sheet items significantly neutralize the statement of financial position.

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

The Bank's exposure to foreign currency exchange rate risk is as follows:

						31 De	ecember 2019
				Other foreign	Total foreign		
-	USD	EUR	RUB	currencies	currencies	KZT	TOTAL
FINANCIAL ASSETS:							
Cash and cash equivalents	956,622	120,540	25,515	320,124	1,422,801	176,891	1,599,692
Obligatory reserves	78,553	3,145	1,027	647	83,372	49,661	133,033
Financial assets at fair value through profit or loss	52	-	-	-	52	4,601	4,653
Amounts due from credit institutions	73,392	16,524	17,163	-	107,079	3,330	110,409
Financial assets at fair value through other comprehensive							
income	757,247	34,905	4,828	-	796,980	748,913	1,545,893
Debt securities at amortised cost, net of allowances for	•	·	•		•	•	
expected credit losses	154,351	-	-	-	154,351	1,044,902	1,199,253
Loans to customers	926,392	10,612	4,455	722	942,181	2,799,106	3,741,287
Other financial assets	1,417	139	, 3	6	1,565	58,190	59,755
	2,948,026	185,865	52,991	321,499	3,508,381	4,885,594	8,393,975
FINANCIAL LIABILITIES:							
Amounts due to customers	3,139,115	132,876	33,471	17,584	3,323,046	2,983,727	6,306,773
Amounts due to credit institutions	30,333	2,395	337	4,613	37,678	242,009	279,687
Financial liabilities at fair value through profit or loss	-	-	227	-	227	19,782	20,009
Debt securities issued	414,653	-	_	_	414,653	432,208	846,861
Other financial liabilities	10	56	-	100	166	33,070	33,236
	3,584,111	135,327	34,035	22,297	3,775,770	3,710,796	7,486,566
Net balance sheet position	(636,085)	50,538	18,956	299,202	(267,389)	1,174,798	907,409
Net off balance sheet position	629,559	(49,550)	(17,249)	(310,495)	252,265	(279,924)	
Net position	(6,526)	988	1,707	(11,293)	(15,124)	894,874	

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

						31 De	cember 2018
				Other foreign	Total foreign		
	USD	EUR	RUB	currencies	currencies	KZT	TOTAL
FINANCIAL ASSETS:							
Cash and cash equivalents	1,017,145	133,282	29,123	206,358	1,385,908	299,966	1,685,874
Obligatory reserves	54,068	2,079	742	332	57,221	48,635	105,856
Financial assets at fair value through profit or loss	74	· -	-	-	74	97,853	97,927
Amounts due from credit institutions	72,428	5,696	14,942	_	93,066	427	93,493
Financial assets at fair value through other comprehensive	·	•	•		·		,
income	591,473	26,555	4,098	-	622,126	1,077,342	1,699,468
Debt securities at amortised cost, net of allowances for	,	•	•		•		
expected credit losses	-	-	-	_	-	1,044,939	1,044,939
Loans to customers	1,006,227	5,815	2,901	591	1,015,534	2,428,221	3,443,755
Other financial assets	6,487	302	6	11	6,806	47,301	54,107
9	2,747,902	173,729	51,812	207,292	3,180,735	5,044,684	8,225,419
FINANCIAL LIABILITIES:							
Amounts due to customers	3,352,283	127,717	34,748	10,611	3,525,359	2,910,628	6,435,987
Amounts due to credit institutions	26,853	2,457	338	2,204	31,852	136,742	168,594
Financial liabilities at fair value through profit or loss	, <u>-</u>	, -	203	, -	203	6,813	7,016
Debt securities issued	406,256	-	-	-	406,256	494,965	901,221
Other financial liabilities	83	60	_	21	164	19,297	19,461
	3,785,475	130,234	35,289	12,836	3,963,834	3,568,445	7,532,279
Net balance sheet position	(1,037,573)	43,495	16,523	194,455	(783,100)	1,476,239	693,140
Net off balance sheet position	1,052,893	(45,694)	(284)	(214,026)	792,889	(700,861)	
Net position	15,320	(2,199)	16,239	(19,571)	9,789	775,378	

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

Sensitivity analysis of currency risk

The table below indicates the currencies in which the Bank had significant exposure at 31 December 2019 and 2018, and its forecasted cash flows. The analysis calculates the effect of a reasonable possible movement of the currency rate with all other variables held constant on the statement of profit or loss. A negative amount in the table reflects a potential net reduction in the statement of profit or loss, while a positive amount reflects a net potential increase. Sensitivity of currency risk is assessed based on balance sheet and off-balance sheet open currency positions. The management of the Bank believes income tax not to have substantial effect for the purpose of currency risk management.

The impact on income before tax and equity, based on asset values as at 31 December 2019 and 2018, was calculated using the annual analysis of the exchange rates volatility based on historical data of the exchange rates dynamics over the last two years; see the details in the following table:

_	31 D	31 December 2019		ecember 2018
	+15% KZT/USD	-15% KZT/USD	+15% KZT/USD	-15% KZT/USD
Impact on income before tax	(979)	979	2,298	(2,298)
	31 De	ecember 2019	31 De	ecember 2018
	+15% KZT/EUR	-15% KZT/EUR	+15% KZT/EUR	-15% KZT/EUR
Impact on income before tax	148	(148)	(330)	330
	31 De	ecember 2019	31 D	ecember 2018
	+15% KZT/RUB	-15% KZT/RUB	+15% KZT/RUB	-15% KZT/RUB
Impact on income before tax	256	(256)	2,436	(2,436)
The impact on equity is as follows:		ecember 2019		ecember 2018
	+15% KZT/USD	-15% KZT/USD	+15% KZT/USD	-15% KZT/USD
Impact on equity	(979)	979	2,298	(2,298)
<u>-</u>		ecember 2019	31 December 201	
	+15% KZT/EUR	-15% KZT/EUR	+15% KZT/EUR	-15% KZT/EUR
Impact on equity	148	(148)	(330)	330
	31 D	ecember 2019	31 December 2018	
	+15% KZT/RUB	-15% KZT/RUB	+15% KZT/RUB	-15% KZT/RUB
Impact on equity	256	(256)	2,436	(2,436)

Limitations of sensitivity analysis

The above tables demonstrate the effect of a change in a key assumption while other assumptions remain unchanged. In reality, there is a correlation between the assumptions and other factors. It should also be noted that these sensitivities are non-linear, and larger or smaller impacts should not be interpolated or extrapolated from these results.

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

The sensitivity analyses do not take into consideration that the Bank's assets and liabilities are actively managed. Additionally, the financial position of the Bank may vary at the time that any actual market movement occurs. For example, the Bank's financial risk management strategy aims to manage the exposure to market fluctuations. As investment markets move past various trigger levels, management actions could include selling investments, changing investment portfolio allocation and taking other protective action. Consequently, the actual impact of a change in the assumptions may not have any impact on the liabilities, whereas assets are held at market value on the statement of financial position. In these circumstances, the different measurement bases for liabilities and assets may lead to volatility in equity.

Other limitations in the above sensitivity analyses include the use of hypothetical market movements to demonstrate potential risk that only represent the Bank's view of possible near-term market changes that cannot be predicted with any certainty.

Price risk

Price risk is the risk that the value of a financial instrument will fluctuate as a result of changes in market prices, where those changes are caused by factors specific to the individual security, its issuer, or factors affecting all securities traded in the market. The Bank is exposed to price risks of its products which are subject to general and specific market fluctuations.

To limit price risk the Bank determines limits for maximum losses (stop-loss) on each security from trade portfolio to minimize potential losses of trade portfolio.

Price risk assessment is also made on the basis of VaR method through the establishment of Expected Shortfall ("ES") limits on the level of the expected losses, which the Bank is able to undertake within one day in a situation when factual losses may exceed the level of VaR.

Calculation of VaR is based on the following parameters:

- Reporting period 252 working days;
- Confidence interval 95%;
- The method of measurement historical simulation.

The Bank estimates the price risk at 31 December 2019 and 2018 to be not material and therefore quantitative information is not disclosed.

33. Capital risk management

The Bank's objectives when managing capital, which are a broader concept than the "equity" on the face of the statement of financial position, are as follows:

- To comply with the capital requirements set by the NBRK;
- To safeguard the Bank's ability to continue as a going concern so that it can continue to provide returns for shareholders and benefits for other stakeholders; and
- To maintain a strong capital base to support the development of its business.

The required level of capital is determined during the annual budgeting process, taking into account the above objectives, and is approved by the Management Board and the Board of Directors. As of the current date, the capital adequacy of the Bank is calculated according to prudential norms set for banks by the Kazakhstan regulatory authority, applying Basel Committee principles and methods.

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

Currently, regulatory capital is represented by:

- Tier 1 capital, which is required to maintain the normal operating activity of the Bank and absorb losses, as they arise. It consists of Common Equity Tier 1 capital ("CET 1 capital") and Additional Tier 1 capital, which includes common shares issued by the Bank, share premium, retained earnings, other accrued comprehensive income and disclosed reserves and regulatory adjustments (deductions);
- Tier 2 capital, which is required to absorb losses in case of the Bank's liquidation. This part of capital consists of instruments issued by the Bank and deductions.

Risk-weighted assets are split into five different groups, based on the risk level of the investment and its possible impairment, and weighted according to the nature of and reflecting an estimate of credit, market and other risks associated with each asset and counterparty, taking into account any eligible collateral or guarantees. A similar treatment is adopted for off-balance sheet exposure, with some adjustments made to reflect the more contingent nature of the potential losses.

The below table summarizes the regulatory capital composition and capital adequacy ratios of the Bank for the years ended 31 December 2019 and 2018. During these two years, the Bank complied with all of the externally imposed capital requirements to which it is subject to.

Composition of regulatory capital CET Common shares, net of treasury shares		
Common shares, net of treasury shares		
	106,064	106,064
Share premium	1,880	1,880
Retained earnings of prior years	732,411	576,123
Net income for the current year	314,644	281,528
Accumulated disclosed reserves*	53,170	53,761
Property and financial assets at fair value through other comprehensive		
income revaluation reserves	40,167	4,456
Less: goodwill and intangible assets	(9,061)	(8,311)
Less: regulatory adjustments	-	(5,680)
Common Equity Tier 1 (CET 1) Capital	1,239,275	1,009,821
Additional tier 1		
Subordinated debt	102,027	105,464
Tier 2	102,027	105,464
Total regulatory capital	1,341,302	1,115,285
Risk weighted assets	5,815,715	5,157,442
CET 1 capital adequacy ratio	21.3%	19.6%
Tier 1 capital adequacy ratio	21.3%	19.6%
Total capital adequacy ratio	23.1%	21.6%

*As at 31 December 2019, accumulated disclosed reserves comprised from KZT 53,761 million capital reserve (31 December 2018: KZT 53,761 million capital reserve).

Starting from 1 January 2017, prudential norms of the NBRK, which apply certain principles and methods prescribed by Basel III committee, set minimum CET 1 capital, Additional Tier 1 capital and total capital adequacy ratios at 9.5%, 10.5% and 12.0%, respectively.

Notes to the financial statements (continued) For the year ended 31 December 2019 (Millions of Kazakhstani Tenge)

34. Segment analysis

The Bank is managed and reported on the basis of four main operating segments – corporate banking, SME banking, retail banking and investment banking. These segments are strategic business units that offer different products and services and are managed separately.

Retail banking represents private banking services to individuals, including private customer current accounts, deposits, investment savings products, custody, credit and debit cards, consumer loans and mortgages, cash and foreign currency related services to individuals.

Corporate banking represents banking services to corporate clients and financial organizations, including current accounts and correspondent accounts, deposits, custody, overdrafts, loans and other credit facilities, documentary operations, including guarantees and letters of credit, interbank operations, as well as cash services and foreign exchange transactions.

SME banking represents banking services to SME clients and individual entrepreneurs, including current accounts, deposits, overdrafts, loans and other credit facilities, documentary operations and guarantees, foreign exchange transactions and trade finance products.

Investment banking represents services on sale and purchase of securities on the market.

Unallocated amounts are account balances and classes of transactions, which are not allocated to particular segment, not initiated by any business function and relate to the current activity of the Bank. Unallocated assets include fixed assets, intangible assets, non-current assets held for sale, cash on hand and other unallocated assets. Unallocated liabilities include deferred tax liabilities and other unallocated liabilities. Unallocated income includes other income from main and nonoperating activities. Unallocated expenses include allowance for expected credit losses on accounts receivable, operating overhead expenses, insurance expenses and income tax.

The segment information below is based on financial information used for performance evaluation by the Bank's Chairperson of the Management Board, the Bank's chief operating decision maker, in accordance with IFRS 8. The Bank's Management reviews discrete financial information for each segment, including evaluation of operating results, assets and liabilities.

There were no transactions between business segments during the years ended 31 December 2019 and 2018.

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

Segment information for the main reportable business segments of the Bank for the years ended 31 December 2019 and 2018, is set out below:

	Retail banking	Corporate banking	SME banking	Investment banking	Unallocated	Total
As at 31 December 2019 and for the year then ended	Retuil bullking	banking	OHE Bunking	Dunking	Ondirocated	Total
External revenues	268,266	292,498	98,243	196,447	21,738	877,192
Total revenues	268,266	292,498	98,243	196,447	21,738	877,192
Total revenues comprise:						
- Interest income	174.823	252,603	61.374	196,447	_	685,247
- Fee and commission income, including:	84,861	12,296	20,648	130,447	_	117,805
Payment cards operations	61,848	116	973	_	_	62,937
Bank transfers - settlements	5,216	2,680	7,051	_	_	14,947
Cash operations	1,466	1,476	7,892		_	10,834
Letters of credit and guarantees issued	1,400	7,804	1,784	_		9,588
Servicing customers' pension payments	8,122	7,804	1,764	-	-	8,122
		-	-	-	-	
Bank transfers – salary projects	6,925		2.045	-	-	6,925
Maintenance of customer accounts	313	98	2,815	-	-	3,226
Other	971	122	133	-		1,226
- Net realised gain from financial assets at fair value through other comprehensive income				-	6,766	6,766
- Net foreign exchange gain	8,582	17,240	14,205	-	3,723	43,750
- Share in profit of associate	-	-	-	-	5,742	5,742
- Dividends received from subsidiaries	-	10,359	2,016	-	-	12,375
- Other income	-	-	<u> </u>	-	5,507	5,507
Total revenues	268,266	292,498	98,243	196,447	21,738	877,192
- Interest expense	(129,106)	(77,064)	(14,163)	(97,121)	(287)	(317,741)
- Credit loss expense	(6,784)	(11,244)	(4,551)	(121)	(732)	(23,432)
- Fee and commission expense	(48,704)	(2,659)	(501)	(165)	(732)	(52,029)
	(46,704)		(501)	(103)	-	
- Net loss from financial assets and liabilities at fair value through profit or loss	(04.500)	(21,555)	- (4.4.600)	(01.4)	- (6.702)	(21,555)
- Operating expenses	(84,589)	(5,639)	(14,698)	(814)	(6,792)	(112,532)
- Other credit loss expense	(46)	(1,524)	(157)	-	-	(1,727)
Total expenses	(269,229)	(119,685)	(34,070)	(98,221)	(7,811)	(529,016)
Segment result	(963)	172,813	64,173	98,226	13,927	348,176
Income before income tax expense					(00.500)	348,176
Income tax expense					(33,532)	(33,532)
Net income						314,644
Total segment assets	914,964	3,972,184	540,632	2,745,146	646,259	8,819,185
Total segment liabilities	3,126,935	2,634,303	823,257	846,862	139,492	7,570,849
Other segment items:						
Capital expenditures						(12,146)
Depreciation and amortization						(9,435)
Investment in associate						26,732

Notes to the financial statements (continued) For the year ended 31 December 2019 (Millions of Kazakhstani Tenge)

	Retail banking	Corporate banking	SME banking	Investment banking	Unallocated	Total
As at 31 December 2018 and for the year then ended						
External revenues	246,153	417,624	79,224	195,136	27,492	965,629
Total revenues	246,153	417,624	79,224	195,136	27,492	965,629
Total revenues comprise:						
- Interest income	168,080	237,897	57,815	190,206	-	653,998
- Fee and commission income	77,628	17,894	20,793	114	-	116,429
- Net gain from financial assets and liabilities at fair value through profit or loss	-	105,653	-	4,816	-	110,469
- Dividends from subsidiaries	-	40,958	-	-	-	40,958
- Share in profit of associate	-	-	-	-	2,899	2,899
- Recovery of other credit loss expense	445	15,222	616	-	-	16,283
- Other income	-	-	-	-	24,593	24,593
Total revenues	246,153	417,624	79,224	195,136	27,492	965,629
- Interest expense	(156,310)	(79,383)	(10,519)	(83,399)	_	(329,611)
- (Credit loss expense)/recovery of credit loss expense	(25,492)	8,826	(4,838)	184	(5,742)	(27,062)
- Fee and commission expense	(32,180)	(9,430)	(2,074)	(97)	-	(43,781)
- Net realised loss from financial assets at fair value through other comprehensive income	(,,	(-,,	(=/5: 1)	(1,593)	-	(1,593)
- Operating expenses	(73,595)	(6,592)	(15,764)	(974)	(17,095)	(114,020)
- Loss from impairment of non-financial assets	`	` -		`-'	(22,099)	(22,099)
- Net foreign exchange gain/(loss)	10,795	(108,491)	13,452	-	17,143	(67,101)
Total expenses	(276,782)	(195,070)	(19,743)	(85,879)	(27,793)	(605,267)
Segment result	(30,629)	222,554	59,481	109,257	(301)	360,362
Income before income tax expense						360,362
Income tax expense						(78,834)
Net income						281,528
Total segment assets	805.609	3,949,069	487,551	2,744,407	644,464	8,631,100
Total segment liabilities	3,287,697	2,386,844	893,768	901,221	137,226	7,606,756
Other segment items:						
Capital expenditures						(4,937)
Depreciation and amortization Investment in associate						(9,357)
Investment in associate						20,437

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

Geographical information

Information for the main geographical areas of the Bank is set out below as at 31 December 2019 and 2018, and for the years then ended.

	Kazakhstan	OECD	Non-OECD	Total
2019				
Total assets	7,491,358	1,211,053	116,774	8,819,185
External revenues	813,587	37,161	26,444	877,192
Capital expenditure	(10,609)	-	· -	(10,609)
2018				
Total assets	7,832,069	672,795	126,236	8,631,100
External revenues	913,908	36,785	14,936	965,629
Capital expenditure	(4,937)	-	-	(4,937)

External revenues, assets and credit related commitments have generally been allocated based on domicile of the counterparty. Cash on hand, property and equipment and capital expenditure have been allocated in the Republic of Kazakhstan.

35. Fair values of financial instruments

IFRS defines fair value as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

Fair value of the Bank's financial assets and financial liabilities measured at fair value on a recurring basis.

Some of the Bank's financial assets and financial liabilities are measured at fair value at the end of each reporting period. The following table gives information about how the fair values of these financial assets and financial liabilities are determined (in particular, the valuation technique(s) and inputs used).

Financial assets and financial liabilities are classified in their entirety based on the lowest level of input that is significant to the fair value measurements. Management assessment of the significance of a particular input to the fair value measurements requires judgment, and may affect the valuation of the assets and liabilities being measured and their placement within the fair value hierarchy.

The Bank considers that the accounting estimate related to valuation of financial instruments where quoted markets prices are not available is a key source of estimation uncertainty because: (i) it is highly susceptible to change from period to period because it requires management to make assumptions about interest rates, volatility, exchange rates, the credit rating of the counterparty, valuation adjustments and specific feature of the transactions and (ii) the impact that recognising a change in the valuations would have on the assets reported on its statement of financial position as well as its profit/(loss) could be material.

The following table provides an analysis of financial instruments that are measured subsequent to initial recognition at fair value, grouped into Levels 1 to 3 based on the degree to which the fair value is observable.

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

The table below summarises the Bank's financial assets and liabilities held at fair value by valuation methodology at 31 December 2019 and 2018:

	Fair value	e at	_			
		31 December			Significant	Relationship of unobservable inputs
Financial Assets/Liabilities	31 December 2019		Fair value hierarchy	Valuation technique(s) and key input(s)	input(s)	to fair value
Derivative financial assets at fair value through profit or loss, excluding options (Note 7)	11	-	Level 1	Quoted bid prices in an active market	Not applicable	Not applicable
Derivative financial assets at fair value through profit or loss, excluding options (Note 7)	295	2,656	Level 2	Discounted cash flows. Future cash flows are estimated based on forward exchange rates (from observable forward exchange rates at the end of the reporting period).	Not applicable	Not applicable
Derivative financial assets at fair value through profit or loss (Note 7)	4,347	95,271	Level 3	Future cash flows in USD discounted using LIBOR rate obtained from available sources. Future cash flows in KZT discounted using internal rate of return, which was calculated based on LIBOR and foreign exchange rates obtained from available sources. The difference between net present values of these discounted cash flows should be equal to zero at initial recognition.	KZT implied rate	The greater KZT implied rate – the smaller fair value
Total financial assets at fair value through profit or loss	4,653	97,927				
Derivative financial liabilities at fair value through profit or loss excluding options (Note 7)	25	-	Level 1	Quoted bid prices in an active market Discounted cash flows.	Not applicable	Not applicable
Derivative financial liabilities at fair value through profit or loss excluding options (Note 7)	19,984	7,016	Level 2	Future cash flows are estimated based on forward exchange rates (from observable forward exchange rates at the end of the reporting period).	Not applicable	Not applicable
Financial liabilities at fair value through profit or loss	20,009	7,016				
Non-derivative financial assets at fair value through other comprehensive income (Note 9)	796,980	1,699,468	Level 1	Quoted bid prices in an active market	Not applicable	Not applicable
Non-derivative financial assets at fair value through other comprehensive income (Note 9)	748,913		Level 2	Quoated bid process in a non-active market	Not applicable	Not applicable
Financial assets at fair value through other comprehensive income	1,545,893	1,699,468				

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

There were no transfers between Level 1 and 2, nor between Levels 2 and 3, during the years ended 31 December 2019 and 2018.

	Financial assets at fair value through profit or loss (Level 3)
31 December 2017 Additions Gain to profit or loss Settlements*	- 70,562 96,584 (71,875)
31 December 2018 Loss to profit or loss Settlements*	95,271 (8,403) (82,521)
31 December 2019	4,347

^{*} As at 31 December 2019 and 2018, the settlements include interest and repayment of NBRK swaps.

Fair value of financial assets and financial liabilities that are not measured at fair value on a recurring basis (but fair value disclosures are required)

The following methods and assumptions are used by the Bank to estimate the fair value of financial instruments not carried at fair value.

Amounts due from and to credit institutions

For assets and liabilities maturing within one month, the carrying amount approximates fair value due to the relatively short-term maturity of these financial instruments. For the assets and liabilities maturing in over one month, the fair value was estimated as the present value of estimated future cash flows, discounted at the appropriate year-end market rates.

Loans to customers

The estimate was made by discounting the scheduled future cash flows of the individual loans through the estimated maturity using prevailing market rates as at the respective year-end.

Amounts due to customers

Interest rates charged to customers closely approximate market interest rates and accordingly, the carrying amounts approximate fair values.

Debt securities issued

Market values have been used to determine the fair value of debt securities traded on an active market. For other debt securities, the fair value was estimated as the present value of estimated future cash flows discounted at the year-end market rates.

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

The following table sets out the carrying amount and fair values of financial assets and liabilities not carried at their fair values:

	31 D	ecember 2019	31 December 2018		
	Carrying amount	Fair value	Carrying amount	: Fair value	
Financial assets					
Amounts due from credit institutions	110,409	112,195	93,493	92,688	
Loans to customers	3,741,287	3,656,562	3,443,755		
Debt securities at amortised cost, net of	-, , -	-,,	-, -,	-,- , -	
allowances for expected credit losses	1,199,253	1,204,424	1,044,939	1,077,222	
Financial liabilities					
Amounts due to customers	6,306,773	6,076,871	6,435,987	6,608,962	
Amounts due to credit institutions	279,687	304,046	168,594	158,712	
Debt securities issued	846,861	832,122	901,221	973,169	
			31	December 2019	
	Level 1	Level 2	Level 3	Total fair value	
Financial assets					
Amounts due from credit institutions	_	112,195	_	112,195	
Loans to customers	-	-	3,656,562	3,656,562	
Debt securities at amortised cost, net of			3,030,502	3,030,502	
allowances for expected credit losses	-	1,204,424	-	1,204,424	
Financial liabilities					
Amounts due to customers	-	6,076,871	_	6,076,871	
Amounts due to credit institutions	-	304,046	-	304,046	
Debt securities issued	832,122	· -	-	832,122	
			31	December 2018	
	Level 1	Level 2	Level 3	Total fair value	
Financial assets					
Amounts due from credit institutions	_	92,688	_	92,688	
Loans to customers	_	-	3,377,107	3,377,107	
Debt securities at amortised cost, net of			3,377,107	3/3///10/	
allowances for expected credit losses	-	1,077,222	-	1,077,222	
Financial liabilities					
Amounts due to customers	_	6,608,962	-	6,608,962	
Amounts due to credit institutions	_	158,712	-	158,712	
Debt securities issued	973,169	-	-	973,169	
	,			,	

The carrying amounts of cash and cash equivalents, obligatory reserves, other financial assets and other financial liabilities approximates fair value due to the short-term nature of such financial instruments.

36. Related party transactions

Related parties or transactions with related parties are assessed in accordance with IAS 24 "Related Party Disclosures". Related parties may enter into transactions which unrelated parties might not. Terms, conditions and amounts of related party transactions are usually same as those between unrelated parties.

Considering each possible related party not only their legal status is taken into account but also the substance of the relationship between these parties.

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

As at 31 December 2019 and 2018, the Bank had the following transactions outstanding with related parties:

	31 December 2019		31 December 2018	
	Related party balances	Total category as per financial statements caption	Related party balances	Total category as per financial statements caption
Cash and cash equivalents -subsidiaries	20,835 20,835	1,599,692	20,574 20,574	1,685,874
Amounts due from credit institutions -subsidiaries	81,873 81,873	110,409	78,063 78,063	93,493
Investments in subsidiaries -subsidiaries	218,460 218,460	218,460	172,308 172,308	172,308
Loans to customers before allowances for expected credit losses -entities with joint control or significant influence over the Bank	133,652	4,107,864	154,322 1,641	3,810,483
 -key management personnel of the Bank or its parent -subsidiaries -other related parties 	6 133,632 15		86 152,575 20	
Allowances for expected credit losses -key management personnel of the Bank or its parent company -entities with joint control or significant influence over the Bank -subsidiaries -other related parties	(9,552) (1) - (9,550) (1)	(366,577)	(16,546) - (16) (16,530)	(366,728)
Other assets -subsidiaries	335 335	71,740	1,106 1,106	64,142
Amounts due to customers -the parent -entities with joint control or significant	383,843 230,663	6,306,773	256,835 69,882	6,435,987
influence over the Bank -key management personnel of the Bank or parent -subsidiaries -other related parties	4,469 9,871 6,639 132,201		9,480 11,076 161,698 4,699	
Amounts due to credit institutions -subsidiaries	8,644 8,644	279,687	8,375 8,375	168,594
Debt securities issued -subsidiaries	1,088 1,088	846,861	4,097 4,097	901,221

Notes to the financial statements (continued) For the year ended 31 December 2019

(Millions of Kazakhstani Tenge)

Included in the statements of profit or loss for the years ended 31 December 2019 and 2018, are the following amounts which arose due to transactions with related parties:

_		Year ended 31 December 2019		Year ended 31 December 2018
	Related party transactions	Total category as per financial statements caption	Related party transactions	Total category as per financial statements caption
Interest income calculated using the effective interest method -entities with joint control or significant influence over the	12,640	685,247	12,315	653,998
Bank	51		127	
-key management personnel of the Bank or its parent -subsidiaries -other related parties	12,587 2		13 11,997 178	
Interest expense -the parent -entities with joint control or significant influence over the	(4,090) (1,694)	(317,741)	(5,086) (2,479)	(329,611)
Bank -key management personnel of the	(144)		(22)	
Bank or its parent -subsidiaries -other related parties	(115) (265) (2,272)		(213) (869) (1,503)	
Fee and commission income -subsidiaries	758 758	117,805	8,501 8,501	116,429
Fee and commission expense -subsidiaries	(1,058) (1,058)	(52,029)	(8,191) (8,191)	(43,781)
Dividends received from subsidiaries -subsidiaries	12,375 12,375	12,375	40,958 40,958	40,958
Operating expenses -subsidiaries	(12,013) (12,013)	(112,532)	(10,130) - (10,130)	(114,020)

_	Year ended 31 December 2019		Year ended 31 December 2018	
	Related party transactions	Total category as per financial statements caption	Related party transactions	Total category as per financial statements caption
Key management personnel compensation: -salaries and other employee benefits -subsidiaries	2,591 2,496 95	55,816	3,672 3,672	55,260

37. Subsequent events

On 19 February 2020, the Bank announced a consent solicitation in relation to the outstanding unsubordinated bonds, denominated in USD, related to the certain amendments to their terms and conditions in order to align them with the Bank's current dividend policy updated in June 2019.

On 25 February 2020, the Bank announced the convening of absentee general meetings of holders of the outstanding local unsubordinated bonds, denominated in KZT, in order to make certain amendments to their terms and conditions to align them with the Bank's current dividend policy updated in June 2019. The respective bondholders' meetings will be held on 18 March 2020.