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INDEPENDENT AUDITORS' REPORT

To the Management and Shareholder of Intesa Sanpaolo Bank Albania sh.a.

Opinion

We have audited the financial statements of Intesa Sanpaolo Bank Albania sh.a. ("the Bank"), which comprise the statement of financial position as at 31 December 2020, and the statement of profit or loss and comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Bank as at 31 December 2020, 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 Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Bank in accordance with the Code of Ethics for Professional Accountants (IESBA Code) and with the ethical requirements that are relevant to our audit of the financial statements in Albania, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

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

Other information

Other information consists of information that will be included in the Bank's Annual Report other than the financial statements and our auditor's report thereon. Management is responsible for the other information. The Bank's 2020 Annual report is expected to be made available to us after the date of this report. Our opinion on the financial statements does not cover the other information and we will not express any form of assurance conclusion thereon. In connection with our audit of the 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 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 the Management and Those Charged with Governance for the Financial Statements

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

In preparing the 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.



Auditor's Responsibilities for the Audit of the Financial Statements

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

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

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

BDO ALBANIA SHPK

BDO Albania sh.p.k. 15 March 2021 Tirana, Albania

BDO ALBANIA Sh.p.k. NIPT L02407004C TIRANA - ALBANIA Besjana Doda

Engagement Partner

INTESA SANPAOLO BANK ALBANIA SH.A.

Financial Statements

For the year ended 31 December 2020

(with independent auditors' report thereon)

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Statement of financial position

	Notes	31 December 2020	31 December 2019
Assets			
Cash and cash equivalents	9	32,417,350	30,240,115
Loans and advances to banks	10	26,736,572	29,146,303
Investment securities	11	71,773,704	66,919,643
Loans and advances to customers	12	50,902,837	44,864,090
Non-current assets held for sale	13	-	20,711
Current tax assets		379,233	347,992
Property and equipment	14	1,915,582	2,211,673
Right-of-use assets	15	601,159	460,883
Intangible assets	16	489,831	600,977
Investment property	17	533,798	545,556
Deferred tax assets		458,319	531,687
Inventory and other assets	18	2,425,088	1,682,647
Total Assets	-	188,633,473	177,572,277
Liabilities			
Due to banks	19	2,273,426	2,250,043
Due to customers	20	159,507,095	150,941,625
Lease liabilities	15	602,986	445,944
Deferred tax liabilities	21	259,345	213,684
Provisions	22	835,305	1,065,558
Other liabilities	23	2,103,547	1,018,663
Total Liabilities	- -	165,581,704	155,935,517
Equity			
Share capital	24	5,562,518	5,562,518
Share premium	24	1,383,880	1,383,880
Reserves	25	6,303,154	6,169,157
Retained earnings	-	9,802,217	8,521,205
Total Equity	-	23,051,769	21,636,760
Total Liabilities and Equity	-	188,633,473	177,572,277
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The Statement of financial position is to be read in conjunction with the accompanying notes on pages 6 to 71 forming an integral part of these financial statements.

Intesa Sanpaolo Bank Albania Sh.a.
Statement of profit or loss and other comprehensive income for the year ended 31 December 2020
(in thousands of Lek)

Statement of profit or loss and other comprehensive income

	Notes	2020	2019
Interest income		4,110,416	4,326,621
Interest expense		(878,851)	(888,984)
Net interest income	26	3,231,565	3,437,637
Fee and commission income		1,092,457	1,208,021
Fee and commission expense		(320,515)	(355,321)
Net fee and commission income	27	771,942	852,700
Net other income	28	540,109	548,308
Other operating expenses, net	29	(1,017,465)	(456,762)
Operating income		3,526,151	4,381,883
Net impairment loss on financial assets Impairment losses/write-backs to other	7(a)	(126,879)	(201,791)
financial activities	22	7,891	28,106
Impairment of repossessed assets	18	565,988	267,260
Personnel expenses	30	(1,184,249)	(1,065,593)
Operating lease expenses	32	(15,789)	(47,783)
Depreciation and amortization	14,16	(520,844)	(462,332)
Amortization of leasehold improvements	18	(15,891)	(14,192)
Amortization and impairment of			
Investment property	17	(11,758)	-
Other administration expenses	31	(898,496)	(876,596)
Provisions for risk and expenses	22	182,866	15,082
Total expenses		(2,017,161)	(2,357,839)
Net income before taxes		1,508,990	2,024,044
Income tax expense	32	(214,456)	(322,170)
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Profit for the year		1,294,534	1,701,874
Other comprehensive income Items that are or may be reclassified subsequently to profit or loss			
Change in fair value of investment securities at FVOCI		448,560	161,528
Related tax Items that will not be reclassified to		(67,284)	(24,095)
<pre>profit or loss Change in revaluation of functional properties</pre>		(284,426)	-
Related tax		42,664	
Other comprehensive income for the year, net of tax		139,514	137,433
Total comprehensive income for the year, net of tax		1,434,048	1,839,307

The Statement of profit or loss and other comprehensive income is to be read in conjunction with the accompanying notes on pages 6 to 71 forming an integral part of these financial statements.

Statement of changes in equity

	Share capital	Share premium	Legal and regulatory reserves	Fair value reserve	Revaluation reserve	Other capital reserve	Merger Reserve	Retained earnings	Total
Balance at 1 January 2020	5,562,518	1,383,880	1,825,623	40,152	775,431	714,556	2,813,396	8,521,205	21,636,761
Profit for the year	-	-	-	-	-	-	-	1,294,534	1,294,534
Other comprehensive income Change in fair value of debt									
investment at FVOCI, net of									
income tax	-	-	-	375,759	-	-	-	-	375,759
Change in the Revaluation reserve	-	-	-	-	(241,762)	-	-		(241,762)
Change in the DTA of FTA reserve	-	-	-	-	-	-	-	(13,523)	(13,523)
Total other comprehensive									
income		-	-	375,759	(241,762)	-	-	(13,523)	120,474
Transaction with owners, recorded directly in equity									
Dividends to equity holders	-	-	-	-	-	-	-	-	-
Total contributions by and distribution to owners		-	-	-	-	-	-	-	-
Balance at 31 December 2020	5,562,518	1,383,880	1,825,623	415,911	533,669	714,556	2,813,396	9,802,216	23,051,769

The Statement of changes in equity is to be read in conjunction with the accompanying notes on pages 6 to 71 forming an integral part of these financial statements.

Statement of changes in equity

	Share capital	Share premium	Legal and regulatory reserves	Fair value reserve	Revaluation reserve	Other capital reserve	Merger Reserve	Retained earnings	Total
Balance at 1 January 2019 Profit for the year Other comprehensive income	5,562,518	1,383,880	1,825,623 -	(97,281)	775,431 -	714,556 -	2,813,396	7,300,788 1,701,874	20,278,911 1,701,874
Change in fair value of debt investment at FVOCI, net of income tax Change in the DTA of FTA reserve	-	-	-	137,433	-	-	-	(44,750)	137,433 (44,750)
Total comprehensive income for the year Transaction with owners, recorded		-	-	137,433	-	-	-	(44,750)	92,683
directly in equity Dividends to equity holders Total contributions by and distribution to owners	-	-	-	-	-	-	-	(436,707) (436,707)	(436,707) (436,707)
Balance at 31 December 2019	5,562,518	1,383,880	1,825,623	40,152	775,431	714,556	2,813,396	8,521,205	21,636,761

The Statement of changes in equity is to be read in conjunction with the accompanying notes on pages 6 to 71 forming an integral part of these financial statements.

Statement of cash flows

Net profit for the year Adjustments for:	2020 1,294,534	2019 1,701,874
Depreciation and amortization	520,844	462,332
Impairment of investment property	11,758	, -
Disposal of property and equipment and intangibles	-	32,332
Net impairment reversal on loans and advances to customers	126,879	201,791
Write down of inventory	(565,988)	(267,260)
Net interest income	(3,231,565)	(3,437,637)
Net impairment loss on off-balance sheet items	(7,891)	(28,106)
Tax expense	214,456	322,170
Changes in		
Loans and advances to banks	2,409,731	(8,892,636)
Loans and advances to customers	(6,211,406)	(1,109,734)
Due to banks	23,383	(512,376)
Due to customers	8,617,998	5,473,807
Non-current assets held for sale	20,711	1,111,961
Inventory and other assets	(207,695)	1,454,907
Other liabilities and provisions	994,986	(128,517)
Deferred tax asset	(2,556)	171,620
Deferred tax liability	91,322	80,765
Interest received	4,276,139	4,299,205
Interest paid	(931,379)	(904,469)
Income taxes paid	(183,213)	(525,831)
Net cash from/(used) in operating activities	7,261,048	(493,802)
Cash flows from investing activities		
Acquisition of property and equipment	(36,448)	(784,984)
Acquisition of intangible assets	(192,856)	(298,181)
Net acquisitions of investments securities	(4,854,509)	(3,036,517)
Net cash used in investing activities	(5,083,813)	(4,119,682)
Cash flows from financing activities Dividend paid to shareholders	_	(436,707)
Net cash used in financing activities	_	(436,707)
net cush used in financing activities		(430,707)
Net increase in cash and cash equivalents	2,177,235	(5,050,191)
Cash and cash equivalents at 1 January	30,240,115	35,290,306
Cash and cash equivalents at 31 December	32,417,350	30,240,115
	-	

The Statement of cash flows is to be read in conjunction with the accompanying notes on pages 6 to 71 forming an integral part of these financial statements.

These financial statements have been approved by the Board of Directors of Intesa Sanpaolo Bank Albania sh.a. on 12 March 2021 and signed on its behalf by:

Silvio Pedrazzi	Julian Cela
Chief Executive Officer	Chief Financial Officer

1. Reporting entity

Intesa Sanpaolo Bank Albania Sh.a, (the "Bank"), is a financial institution domiciled in Albania. The Bank's registered office is at "Ismail Qemali" street, no. 27, and operates through a network of 35 branches and agencies, located in different cities of Albania: Tirana, Durres, Vlora, Elbasan, Fier, Berat, Gjirokastra, Korca, Lushnja, Shkoder, Lezhe, Kavaje (2019: 35 branches and agencies).

The Bank had 657 employees as at 31 December 2020 (2019: 663).

2. Basis of accounting

These financial statements have been prepared in accordance with IFRS Standards. They were authorized for issue by Management on 12 March 2021 for approval by the Board of Directors.

3. Basis of measurement

The financial statements are prepared on the amortized or historical cost basis except for financial assets at FVOCI, investment properties and own used properties, which are stated at fair value.

4. Functional and presentation currency

The financial statements are presented in Lek, which is the Bank's functional and presentation currency. Except as indicated otherwise, financial information presented in Lek has been rounded to the nearest thousand.

5. Use of estimates and judgments

In preparing these financial statements, management has made judgements, estimates and assumptions that affect the application of the Bank's accounting policies and the reported amounts of assets, liabilities, income and expenses. Actual results may differ from these estimates

Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to estimates are recognized prospectively.

A. Judgements

Information about judgements made in applying accounting policies that have the most significant effects on the amounts recognized in the financial statements is included in the following notes.

-Note 7.(a): establishing the criteria for determining whether credit risk on the financial asset has increased significantly since initial recognition, determining methodology for incorporating forward-looking information into measurement of ECL and selection and approval of models used to measure ECL.

-Note6.(f).(ii): classification of financial assets: assessment of the business model within which the assets are held and assessment of whether the contractual terms of the financial asset are SPPI on the principal amount outstanding.

B. Assumptions and estimation uncertainties

Information about assumptions and estimation uncertainties that have a significant risk of resulting in a material adjustment in the year ended 31 December 2020 is included in the following notes.

- -Note 7.(a): impairment of financial instruments: determining inputs into the ECL impairment model, including key assumptions used in estimating recoverable cash flows and incorporation of forward-looking information
- -Note6.(f).(vi): determination of the fair value of financial instruments with significant unobservable inputs
- -Note 6.(e).(ii): recognition of deferred tax assets
- Note 6.(r): recognition and measurement of contingencies: key assumption about the likelihood and magnitude of an outflow of resources
- Note 6.(n): net realizable value of inventory: fair value measurement with significant unobservable inputs

6. Significant accounting policies

The accounting policies set out below have been consistently applied to all periods presented in these financial statements by the Bank.

(a) Foreign currency

Transactions in foreign currencies are translated into the functional currency at the spot exchange rates at the date of the transactions.

Monetary assets and liabilities denominated in foreign currencies at the reporting date are translated to the functional currency at the spot exchange rate at that date. The foreign currency gain or loss on monetary items is the difference between amortized cost in the functional currency at the beginning of the year, adjusted for effective interest and payments during the year, and the amortized cost in foreign currency translated at the spot exchange rate at the end of the year. Non-monetary assets and liabilities that are measured at fair value in a foreign currency are translated to the functional currency at the spot exchange rate at the date that the fair value was determined.

Non-monetary items that are measured based on historical cost in a foreign currency are translated using the spot exchange rate at the date of the transaction. Foreign currency differences arising on retranslation are generally recognized in profit or loss. Foreign currency differences arising from retranslation of transactions with owners are recorded directly in equity.

(b) Interest

Effective Interest rate

Interest income and expense are recognized in profit or loss using the effective interest method. The 'effective interest rate' is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument to

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

When calculating the effective interest rate for financial instruments other than purchased or originated credit-impaired assets, the Bank estimates future cash flows considering all contractual terms of the financial instrument, but not ECL. For purchased or originated credit-impaired financial assets, a credit-adjusted effective interest rate is calculated using estimated future cash flows including ECL. The calculation of the effective interest rate includes transaction costs and fees and points paid or received that are an integral part of the effective interest rate. Transaction costs include incremental costs that are directly attributable to the acquisition or issue of a financial asset or financial liability

Amortized cost and gross carrying amount

The 'amortized cost' of a financial asset or financial liability is the amount at which the financial asset or financial liability is measured on initial recognition minus the principal repayments, plus or minus the cumulative amortization using the effective interest method of any difference between that initial amount and the maturity amount and, for financial assets, adjusted for any expected credit loss allowance. The 'gross carrying amount of a financial asset' is the amortized cost of a financial asset before adjusting for any expected credit loss allowance.

6. Significant accounting policies (continued)

(b) Interest (continued)

Calculation of interest income and expense

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

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

For financial assets that were credit-impaired on initial recognition, interest income is calculated by applying the credit-adjusted effective interest rate to the amortized cost of the asset. The calculation of interest income does not revert to a gross basis, even if the credit risk of the asset improves.

For information on when financial assets are credit-impaired, see Note 6(f)(vii).

Presentation

Interest income calculated using the effective interest method presented in the statement of profit or loss and OCI includes:

- interest on financial assets and financial liabilities measured at amortised cost;
- interest on debt instruments measured at FVOCI;
- Other interest income presented in the statement of profit or loss and OCI includes interest income on lease receivables.

Interest expense presented in the statement of profit or loss include interest expense from financial liabilities measured at amortised cost.

(c) Fees and commissions

Fees, commission income and expense that are integral to the effective interest rate on a financial asset or liability are included in the measurement of the effective interest rate (see 6 (b)).

If a loan commitment is not expected to result in the draw-down of a loan, then the related loan commitment fee is recognized on straight-line basis over the commitment period.

Other fee and commission income, including account servicing fees, investment management fees, sales commission and placement fees are recognized as the related services are performed. If a loan commitment is not expected to result in a draw-down of a loan, then the related loan commitment fees are recognized on a straight-line basis over the commitment period.

A contract with a customer that results in a recognized financial instrument in the Bank's financial statements may be partially in the scope of IFRS 9 and partially in the scope of IFRS 15. If this is the case, then the Bank first applies IFRS 9 to separate and measure the part of the contract that is in the scope of IFRS 9 and then applies IFRS 15 to the residual.

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

6. Significant accounting policies (continued)

(d) Leases

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

The policy is applied to contracts entered into (or changed) on or after 1 January 2019.

i. Bank acting as a lessee

At commencement or on modification of a contract that contains a lease component, the Bank allocates consideration in the contract to each lease component on the basis of its relative standalone prices. However, for leases of branches and offices premises the Bank has elected not to separate non-lease components and accounts for the lease and non-lease components as a single lease component.

The Bank recognizes a right-of-use asset and a lease liability at the lease commencement date. The right-of-use asset is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or before the commencement date, plus any initial direct costs incurred and an estimate of costs to dismantle and remove any improvements made to branches or office premises.

The right-of-use asset is subsequently depreciated using the straight-line method from the commencement date to the end of the lease term. In addition, the right-of-use asset is periodically reduced by impairment losses, if any, and adjusted for certain measurements of the lease liability.

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

The Bank determines its incremental borrowing rate by analyzing its borrowings from various external sources and makes certain adjustments to reflect the terms of the lease and type of asset leased.

Lease payment included in the measurement of the lease liability comprise the following:

- -fixed payments, including in-substance fixed payments;
- variable lease payments that depend on an index or a rate, initially measured using the index of rate as the commencement date;
- amounts expected to be payable under a residual value guarantee; and
- -the exercise price under a purchase option that the Bank is reasonably certain to exercise, lease payments in an optional renewal period if the Bank is reasonably to exercise an extension option, and penalties for early termination of a lease unless the Bank is reasonably certain not to terminate early.

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

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

Intesa Sanpaolo Bank Albania Sh.a.

Notes to the financial statements for the year ended 31 December 2020

(in thousands of Lek, unless otherwise stated)

6. Significant accounting policies (continued)

(d) Leases (continued)

Bank acting as a lessee (continued)

The Bank presents right-of-use assets in and lease liabilities as part of "other liabilities" in the face of statement of financial position.

Short-term leases and leases of low-value assets

The Bank has elected not to recognize right-of-use assets and lease liabilities for leases of low-value assets and short-term leases. The Bank recognizes the lease payments associated with these leases as an expense on a straight-line basis over the lease term.

ii. Bank acting as a lessor

At inception or on modification of a contract that contains a lease component, the Bank allocates the consideration in the contract to each lease component on the basis of their relative stand-alone selling prices.

When the Bank acts as a lessor, it determines at lease inception whether the lease is a financial lease or an operating lease.

To classify each lease, the Bank makes an overall assessment of whether the lease transfers substantially all the risks and rewards incidental to ownership of the underlying lease. As part of this assessment, the Bank considers certain indicators such as whether the lease is for the major part of the economic life of the asset.

The Bank applies the derecognition and impairment requirements in IFRS 9 to the net investment in the lease. The Bank further regularly reviews estimated unguaranteed residual values used in calculating the gross investment in the lease.

6. Significant accounting policies (continued)

(e) Income Tax

Income tax expense comprises current and deferred tax. It is recognized in profit or loss except to the extent that it relates to items recognized directly in equity or in OCI. Interest and penalties related to income taxes, including uncertain tax treatments, are accounted for under IAS 37 Provisions, Contingent Liabilities and Contingent Assets.

(i) Current Tax

Current tax comprises the expected tax payable or receivable on the taxable income or loss for the year and any adjustment to the tax payable or receivable in respect of previous years. The amount of current tax payable or receivable is the best estimate of the tax amount expected to be paid or received that reflects uncertainty related to income taxes, if any. It is measured using tax rates enacted or substantively enacted at the reporting date.

Current tax assets and liabilities are offset only if certain criteria are met.

(ii) Deferred Tax

Deferred tax is recognized in respect of temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes.

Deferred tax assets are recognized for unused tax losses and deductible temporary differences to the extent that it is probable that future taxable profits will be available against which they can be used. Future taxable profits are determined based on the reversal of relevant taxable temporary differences. If the amount of taxable temporary differences is insufficient to recognize a deferred tax asset in full, then future taxable profits, adjusted for reversals of existing temporary differences, are considered, based on the business plans. Deferred tax assets are reviewed at each reporting date and are reduced to the extent that it is no longer probable that the related tax benefit will be realized; such reductions are reversed when the probability of future taxable profits improves.

Unrecognized deferred tax assets are reassessed at each reporting date and recognized to the extent that it has become probable that future taxable profits will be available against which they can be used.

Deferred tax is measured at the tax rates that are expected to be applied to temporary differences when they reverse, using tax rates enacted or substantively enacted at the reporting date.

The measurement of deferred tax reflects the tax consequences that would follow from the manner in which the Bank expects, at the reporting date, to recover or settle the carrying amount of its assets and liabilities.

Intesa Sanpaolo Bank Albania Sh.a.

Notes to the financial statements for the year ended 31 December 2020

(in thousands of Lek, unless otherwise stated)

6. Significant accounting policies (continued)

(f) Financial assets and financial liabilities

(i) Recognition and initial measurement

The Bank initially recognizes loans and advances, deposits and debt securities on the date on which they are originated. All other financial instruments (including regular-way purchases and sales of financial assets) are initially recognized on the trade date on which the Bank becomes a party to the contractual provisions of the instrument.

A financial asset or financial liability is measured initially at fair value plus, for an item not at fair value through profit and loss, transaction costs that are directly attributable to its acquisition or issue.

(ii) Classification

On initial recognition, the Bank classified a financial asset as measured at amortized cost, FVOCI or FVTPL.

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

- -the asset is held within a business model whose objective is to hold assets to collect contractual cash flows;
- -the contractual terms of the financial asset give rise on specified dates to cash flows that are SPPI.

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

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

On initial recognition of an equity investment that is not held for trading, the Bank may irrevocably elect to present subsequent changes in fair value in OCI. This election is made on an investment-by-investment basis.

All other financial assets are classified as measured at FVTPL.

In addition, on initial recognition, the Bank may irrevocably designate a financial asset that otherwise meets the requirements to be measured at amortized cost or at FVOCI as at FVTPL if doing so eliminates or significantly reduces an accounting mismatch that would otherwise arise.

- 6. Significant accounting policies (continued)
- (f) Financial assets and financial liabilities (continued)
- (ii) Classification (continued)

Business model assessment

The Bank assesses the objective of a business model in which an asset is held at a portfolio level because this best reflects the way the business is managed and information is provided to management. The information considered includes:

- the stated policies and objectives for the portfolio and the operation of those policies in practice. In particular, whether management's strategy focuses on earning contractual interest revenue, maintaining a particular interest rate profile, matching the duration of the financial assets to the duration of the liabilities that are funding those assets or realizing cash flows through the sale of the assets;
- how the performance of the portfolio is evaluated and reported to the Bank's management;
- the risks that affect the performance of the business model (and the financial assets held within that business model) and its strategy for how those risks are managed;
- how managers of the business are compensated (e.g. whether compensation is based on the fair value of the assets managed or the contractual cash flows collected);
- the frequency, volume and timing of sales in prior periods, the reasons for such sales and its expectations about future sales activity. However, information about sales activity is not considered in isolation, but as part of an overall assessment of how the Bank stated objective for managing the financial assets is achieved and how cash flows are realized.

Financial assets that are held for trading or managed and whose performance is evaluated on a fair value basis are measured at FVTPL because they are neither held to collect contractual cash flows nor held both to collect contractual cash flows and to sell financial assets.

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

For the purposes of this assessment, 'principal' is defined as the fair value of the financial asset on initial recognition. 'Interest' is defined as consideration for the time value of money and 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 profit margin.

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

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

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Notes to the financial statements for the year ended 31 December 2020

(in thousands of Lek, unless otherwise stated)

- 6. Significant accounting policies (continued)
- (f) Financial assets and financial liabilities (continued)
- (ii) Classification (continued)

Reclassifications

Financial assets are not reclassified subsequent to their initial recognition, except in the period after the Bank changes its business model for managing financial assets.

Financial liabilities

The Bank classifies its financial liabilities as other financial liabilities, subsequently measured at amortized cost.

See notes 6.(p).

(iii) De-recognition

Financial Assets

The Bank derecognizes a financial asset when the contractual rights to the cash flows from the financial asset expire, or it transfers the rights to receive the contractual cash flows in a transaction in which substantially all of the risks and rewards of ownership of the financial asset are transferred or in which the Bank neither transfers nor retains substantially all of the risks and rewards of ownership and it does not retain control of the financial asset.

On derecognition of a financial asset, the difference between the carrying amount of the asset (or the carrying amount allocated to the portion of the asset derecognized) and the sum of (i) the consideration received (including any new asset obtained less any new liability assumed) and (ii) any cumulative gain or loss that had been recognized in other comprehensive income is recognized in profit or loss. Any interest in transferred financial assets that qualify for derecognition that is created or retained by the Bank is recognized as a separate asset or liability.

The Bank enters into transactions whereby it transfers assets recognized on its statement of financial position, but retains either all or substantially all of the risks and rewards of the transferred assets or a portion of them. In such cases, the transferred assets are not derecognized. Examples of such transactions are securities lending and sale and repurchase transactions.

In transactions in which the Bank neither retains nor transfers substantially all of the risks and rewards of ownership of a financial asset and it retains control over the asset, the Bank continues to recognize the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset

Financial liabilities

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

(iv) Modification of financial assets and financial liabilities

Financial assets

If the terms of a financial asset are modified, then the Bank evaluates whether the cash flows of the modified asset are substantially different.

- 6. Significant accounting policies (continued)
- (f) Financial assets and financial liabilities (continued)
- (iv) Modification of financial assets and financial liabilities (continued)

If the cash flows are substantially different, then the contractual rights to cash flows from the original financial asset are deemed to have expired. In this case, the original financial asset is derecognized (see (iii)) and a new financial asset is recognized at fair value plus any eligible transaction costs. Any fees received as part of the modification are accounted for as follows:

- fees that are considered in determining the fair value of the new asset and fees that represent reimbursement of eligible transaction costs are included in the initial measurement of the asset; and
- other fees are included in profit or loss as part of the gain or loss on derecognition.

If cash flows are modified when the borrower is in financial difficulties, then the objective of the modification is usually to maximize recovery of the original contractual terms rather than to originate a new asset with substantially different terms. If the Bank plans to modify a financial asset in a way that would result in forgiveness of cash flows, then it first considers whether a portion of the asset should be written off before the modification takes place (see below for write-off policy). This approach impacts the result of the quantitative evaluation and means that the derecognition criteria are not usually met in such cases.

If the modification of a financial asset measured at amortized cost or FVOCI does not result in derecognition of the financial asset, then the Bank first recalculates the gross carrying amount of the financial asset using the original effective interest rate of the asset and recognizes the resulting adjustment as a modification gain or loss in profit or loss. For floating-rate financial assets, the original effective interest rate used to calculate the modification gain or loss is adjusted to reflect current market terms at the time of the modification.

Any costs or fees incurred and fees received as part of the modification adjust the gross carrying amount of the modified financial asset and are amortized over the remaining term of the modified financial asset.

If such a modification is carried out because of financial difficulties of the borrower (see 6.f.(vii)), then the gain or loss is presented together with impairment losses. In other cases, it is presented as interest income calculated using the effective interest rate method (see 6 (b)).

Financial liabilities

The Bank derecognizes a financial liability when its terms are modified and the cash flows of the modified liability are substantially different. In this case, a new financial liability based on the modified terms is recognized at fair value. The difference between the carrying amount of the financial liability derecognized and consideration paid is recognized in profit or loss. Consideration paid includes non-financial assets transferred, if any, and the assumption of liabilities, including the new modified financial liability.

If the modification of a financial liability is not accounted for as derecognition, then the amortized cost of the liability is recalculated by discounting the modified cash flows at the original effective interest rate and the resulting gain or loss is recognized in profit or loss. For floating-rate financial liabilities, the original effective interest rate used to calculate the modification gain or loss is adjusted to reflect current market terms at the time of the modification. Any costs and fees incurred are recognized as an adjustment to the carrying amount of the liability and amortized over the remaining term of the modified financial liability by re-computing the effective interest rate on the instrument

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Notes to the financial statements for the year ended 31 December 2020

(in thousands of Lek, unless otherwise stated)

6. Significant accounting policies (continued)

(f) Financial assets and financial liabilities (continued)

(v) Off-setting

Financial assets and liabilities are offset and the net amount is presented in the statement of financial position when, and only when, the Bank has a legal right to offset the amounts and intends either to settle on a net basis or to realize the asset and settle the liability simultaneously.

Income and expenses are presented on a net basis only when permitted by the accounting standards, or for gains and losses arising from Bank's similar transactions such as in the trading activity.

(vi) Fair value measurement

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal or, in its absence, the most advantageous market to which the Bank has access at that date. The fair value of a liability reflects its non-performance risk.

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

If there is no quoted price in an active market, then the Bank uses valuation techniques that maximize the use of relevant observable inputs and minimize the use of unobservable inputs. The chosen valuation technique incorporates all of the factors that market participants would consider in pricing a transaction.

The best evidence of the fair value of a financial instrument at initial recognition is normally the transaction price, i.e. the fair value of the consideration given or received. If the Bank determines that the fair value at initial recognition differs from the transaction price and the fair value is evidenced neither by a quoted price in an active market for an identical asset or liability nor based on a valuation technique that uses only data from observable markets, then the financial instrument is initially measured at fair value, adjusted to defer the difference between the fair value at initial recognition and the transaction price. Subsequently, that difference is recognized in profit or loss on an appropriate basis over the life of the instrument but no later than when the valuation is entirely supported by observable market data or the transaction is closed out.

The fair value of a demand deposit is not less than the amount payable on demand, discounted from the first date on which the amount could be required to be paid.

The Bank recognizes transfers between levels of the fair value hierarchy as of the end of the reporting period during which the change has occurred.

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Notes to the financial statements for the year ended 31 December 2020

(in thousands of Lek, unless otherwise stated)

6. Significant accounting policies (continued)

(f) Financial assets and financial liabilities (continued)

(vii) Impairment

The Bank recognizes loss allowances for ECL on the following financial instruments that are not measured at FVTPL:

- financial assets that are debt instruments;
- financial guarantee contracts issued; and
- loan commitments issued.

The Bank measures loss allowances at an amount equal to lifetime ECL, except for the following, for which they are measured as 12-month ECL:

- debt investment securities that are determined to have low credit risk at the reporting date;
 and
- other financial instruments on which credit risk has not increased significantly since their initial recognition.

The Bank considers a debt investment security to have low credit risk when its credit risk rating is equivalent to the globally understood definition of 'investment grade'. The Bank does not apply the low credit risk exemption to any other financial instruments.

12-month ECL are the portion of ECL that result from default events on a financial instrument that are possible within the 12 months after the reporting date. Financial instruments for which a 12-month ECL is recognized are referred to as 'Stage 1 financial instruments.

Life-time ECL are the ECL that result from all possible default events over the expected life of the financial instrument. Financial instruments for which a lifetime ECL is recognized but which are not credit-impaired are referred to as 'Stage 2 financial instruments.

Measurement of ECL

ECL are a probability-weighted estimate of credit losses. They are measured as follows:

- financial assets that are not credit-impaired at the reporting date: as the present value of all cash shortfalls (i.e. the difference between the cash flows due to the entity in accordance with the contract and the cash flows that the Bank expects to receive);
- financial assets that are credit-impaired at the reporting date: as the difference between the gross carrying amount and the present value of estimated future cash flows;
- undrawn loan commitments: as the present value of the difference between the contractual cash flows that are due to the Bank if the commitment is drawn down and the cash flows that the Bank expects to receive; and
- *financial guarantee contracts*: the expected payments to reimburse the holder less any amounts that the Bank expects to recover.

See also Note 7(a).

Credit-impaired financial assets

At each reporting date, the Bank assesses whether financial assets carried at amortized cost and debt financial assets carried at FVOCI are credit-impaired. 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.

6. Significant accounting policies (continued)

(f) Financial assets and financial liabilities (continued)

(vii) Impairment (continued)

Credit-impaired financial assets (continued)

Evidence that a financial asset is credit-impaired includes the following observable data:

- significant financial difficulty of the borrower or issuer;
- a breach of contract such as a default or past due event;
- the restructuring of a loan or advance by the Bank on terms that the Bank would not consider otherwise;
- it is becoming probable that the borrower will enter bankruptcy or other financial reorganization; or
- the disappearance of an active market for a security because of financial difficulties.

A loan that has been renegotiated due to a deterioration in the borrower's condition is usually considered to be credit-impaired unless there is evidence that the risk of not receiving contractual cash flows has reduced significantly and there are no other indicators of impairment. In assessing whether an investment in sovereign debt is credit-impaired, the Bank considers the following factors.

- The market's assessment of creditworthiness as reflected in the bond yields.
- The rating agencies' assessments of creditworthiness.
- The country's ability to access the capital markets for new debt issuance.
- The probability of debt being restructured, resulting in holders suffering losses through voluntary or mandatory debt forgiveness.
- The international support mechanisms in place to provide the necessary support as 'lender of last resort' to that country, as well as the intention, reflected in public statements, of governments and agencies to use those mechanisms. This includes an assessment of the depth of those mechanisms and, irrespective of the political intent, whether there is the capacity to fulfil the required criteria.

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

- financial assets measured at amortized cost: as a deduction from the gross carrying amount of the assets:
- loan commitments and financial guarantee contracts: generally, as a provision;
- where a financial instrument includes both a drawn and an undrawn component, and the Bank cannot identify the ECL on the loan commitment component separately from those on the drawn component: the Bank presents a combined loss allowance for both components. The combined amount is presented as a deduction from the gross carrying amount of the drawn component. Any excess of the loss allowance over the gross amount of the drawn component is presented as a provision; and
- debt instruments measured at FVOCI: no loss allowance is recognized in the statement of financial position because the carrying amount of these assets is their fair value. However, the loss allowance is disclosed and is recognized in the fair value reserve.

Write-off

Loans and debt securities are written off (either partially or in full) when there is no reasonable expectation of recovering a financial asset in its entirety or a portion thereof. This is generally 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. This assessment is carried out at the individual asset level. Recoveries of amounts previously written off are included in 'impairment losses on financial instruments' in the statement of profit or loss and OCI.

Financial assets that are written off could still be subject to enforcement activities in order to comply with the Bank's procedures for recovery of amounts due.

6. Significant accounting policies (continued)

(g) Cash and cash equivalents

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

Cash and cash equivalents are carried at amortized cost in the statement of financial position.

(h) Loans and advances

Loans and advances captions in the statement of financial position include loans and advances measured at amortized cost. They are initially measured at fair value plus incremental direct transaction costs, and subsequently at their amortized cost using the effective interest method.

When the Bank purchases a financial asset and simultaneously enters into an agreement to resell the asset (or a substantially similar asset) at a fixed price on a future date (reverse repo or stock borrowing), the arrangement is accounted for as a loan or advance, and the underlying asset is not recognized in the Bank's financial statements.

(i) Investment securities

The "investment securities" caption in the statement of financial position includes

- debt investment securities measured at amortized cost (see g (ii)); these are initially measured at fair value plus incremental direct transaction costs, and subsequently at their amortized cost using the effective interest method;
- debt securities measured at FVOCI;

For debt securities measured at FVOCI, gains and losses are recognized in OCI, except for the following, which are recognized in profit or loss in the same manner as for financial assets measured at amortized cost:

- Interest revenue using the effective interest method
- ECL and reversals, and
- Foreign exchange gains and losses

When debt security measured at FVOCI is derecognized, the cumulative gain or loss previously recognized in OCI is reclassified from equity to profit or loss.

6. Significant accounting policies (continued)

(j) Non-current assets held for sale

Non-current assets for which a disposal process has commenced are classified as held-for-sale if it is highly probable that they will be recovered primarily through sale rather than through continuing use. Such assets are generally measured at the lower of their carrying amount and fair value less costs to sell.

(k) Property and equipment

(i) Recognition and measurement

Equipment are measured at cost less accumulated depreciation and any accumulated impairment losses. Property are measured at revalued amounts, being the fair value at the date of revaluation less accumulated depreciation and any accumulated impairment losses. If significant parts of an item of property or equipment have different useful lives, then they are accounted for as separate items (major components) of property and equipment. Any gain or loss on disposal of an item of property and equipment is recognized within other income in profit or loss.

(ii) Subsequent costs

Subsequent expenditure is capitalized only when it is probable that the future economic benefits of the expenditure will flow to the Bank. Ongoing repairs and maintenance are expensed as incurred.

(iii) Depreciation

Depreciation is calculated to write off the cost of items of property and equipment less their estimated residual values using the straight-line method over their estimated useful lives, and is generally recognized in profit or loss. Land and art work are not depreciated.

The estimated useful live for the current and comparative periods are as follows:

		2020	2019
•	Buildings	20-33 years	20-33 years
•	IT and Electrical Equipment	4 to 8 years	4 to 8 years
•	Furniture	3 to 10 years	3 to 10 years
•	Other non-electrical assets	5 years	5 years

(l) Intangible assets

Software, licenses and trademarks compose intangible assets and are stated at cost less accumulated amortization. Subsequent expenditure on intangible assets is capitalized only when it increases the future economic benefits embodied in the specific asset to which it relates. All other expenditure is expensed as incurred. Amortization is charged on a straight-line basis in profit or loss over the estimated useful lives, from the date that it is available for use. The estimated useful lives for the current and comparative periods are as follows:

	2020	2019
 Software 	5 years	5 years
 Licenses and trademarks 	10 years	10 years

(m) Investment property

Investment property is initially measured at cost and subsequently at fair value, with any change therein recognized in profit or loss within other income. Any gain or loss on disposal of investment property (calculated as the difference between the net proceeds from disposal and the carrying amount of the item) is recognized in profit or loss.

When the use of a property changes such that it is reclassified as property and equipment, its fair value at the date of reclassification becomes its cost for subsequent accounting.

6. Significant accounting policies (continued)

(n) Inventory

Inventory comprises repossessed assets acquired through enforcement of security over non-performing loans and advances to customers which do not earn rental, and are not used by the Bank and are intended for disposal in a reasonably short period of time, without significant restructuring. Repossessed assets are measured at the lower of cost and net realizable value and any write-down is recognized in the profit or loss.

(o) Impairment of non-financial assets

At each reporting date, the Bank reviews the carrying amount of its non-financial assets (other than inventory and deferred tax assets) to determine whether there is any indication of impairment. If any such indication exists, then the asset's recoverable amount is estimated. An impairment loss is recognized if the carrying amount of an asset exceeds its recoverable amount. The recoverable amount of an asset is the greater of its value in use and its fair value less costs to sell. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate which reflects current market assessments of the time value of money and the risks specific to the asset. Impairment losses are recognized in profit or loss. An impairment loss is reversed only to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortization, if no impairment loss had been recognized.

(p) Deposits

Deposits are the Bank's sources of debt funding.

Deposits are initially measured at fair value plus directly attributable transaction costs, and subsequently measured at their amortized cost using the effective interest method.

When the Bank sells a financial asset and simultaneously enters into an agreement to repurchase the asset (or a similar asset) at a fixed price on a future date ("repo" or "stock lending"), the arrangement is accounted for as a deposit, and the underlying asset continues to be recognized in the Bank's financial statements.

(q) Provisions

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

A provision for bank levies is recognized when the condition that triggers the payment of the levy is met. If a levy obligation is subject to a minimum activity threshold so that the obligating event is reaching a minimum activity, then a provision is recognized when that minimum activity threshold is reached.

A provision for restructuring is recognized when the Bank has approved a detailed and formal restructuring plan, and the restructuring either has commenced or has been announced publicly. Future operating losses are not provided for.

6. Significant accounting policies (continued)

(r) Financial guarantees and loan commitments

Financial guarantees are contracts that require the Bank to make specified payments to reimburse the holder for a loss that it incurs because a specified debtor fails to make payment when it is due in accordance with the terms of a debt instrument. Loan commitments are firm commitments to provide credit under pre-specified terms and conditions.

Financial guarantees issued or commitments to provide a loan at a below-market interest rate are initially measured at fair value. Subsequently, they are measured as follows:

- at the higher of the loss allowance determined in accordance with IFRS 9 and the amount initially recognized less, when appropriate, the cumulative amount of income recognized in accordance with the principles of IFRS 15.

For other loan commitments:

- the Bank recognizes a loss allowance

Liabilities arising from financial guarantees and loan commitments are included within provisions.

(s) Employee benefits

(i) Defined contribution plans

The Bank makes only compulsory social security contributions that provide pension benefits for employees upon retirement. In Albania, the local authorities are responsible for providing the legally set minimum threshold for pensions under a defined contribution pension plan. The Bank's contributions to the benefit pension plan are expensed in profit or loss as incurred.

(ii) Short-term benefits

Short-term employee benefit obligations are measured on an undiscounted basis and are expensed as the related service is provided. A provision is recognized for the amount expected to be paid under short-term cash bonus or profit-sharing plans if the Bank has a present legal or constructive obligation to pay this amount as a result of past service provided by the employee and the obligation can be estimated reliably.

(t) New standards and interpretation not yet adopted

A number of new standards and amendments to standards are effective for annual periods beginning after 1 January 2020 and earlier application is permitted; however, the Bank has not early adopted them in preparing these financial statements.

The following amended standards are not expected to have a significant impact on the Bank's Financial Statements:

- Onerous Contracts Cost of Fulfilling a Contract (Amendments to IAS 37).
- COVID-19-Related Rent Concessions (Amendment to IFRS 16).b
- Property, Plant and Equipment: Proceeds before Intended Use (Amendments to IAS 16).
- Reference to Conceptual Framework (Amendments to IFRS 3).
- Classification of Liabilities as Current or Non-current (Amendments to IAS 1).
- IFRS 17 Insurance Contracts and amendments to IFRS 17 Insurance Contracts.

7. Financial Risk Management

The Bank is exposed to the following risks from financial instruments:

- a. credit risk
- b. liquidity risk
- c. market risk
- d. operational risk

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

Risk management framework

The Board of Directors of the Bank has overall responsibility for the establishment and oversight of the Bank's risk management framework. The Board has established the Bank's Governance Committees (Executive Directors Committee, Credit Committee, Asset Liability Committee, Operational Risk Committee, Credit Risk Governance Committee, Problematic Loans Committee and other committees) that have the authority for decision-making in their specified areas.

Risk Management Division is responsible for developing and monitoring the Bank's risk management policies in these areas. All the Bank's committees have both executive and non-executive members and report regularly to the Board of Directors on their activities. The Bank's risk management policies are established to identify and analyze the risks faced by the Bank, to set appropriate risk limits and controls, and to monitor risks and adherence to limits. Risk management policies and systems are reviewed regularly to reflect changes in market conditions, products and services offered.

(a) Credit Risk

In the normal course of its business, the Bank is exposed to credit risk on its loans and advances to customers and financial institutions, investment securities and other off-balance-sheet items. Credit risk is the risk of financial loss to the Bank if a customer or counterparty to a financial instrument fails to meet its contractual obligations, and arises principally from the Bank's loans and advances to customers, debt securities, on funds with other financial institutions and other off-balance sheet items. For risk management reporting purposes, the Bank considers and consolidates all elements of credit risk exposure (such as individual obligor default risk, country and sector risk). The Bank manages its exposure to credit risk on a regular basis by closely monitoring credit limits, its loan portfolio and concentration of exposure.

During 2020 in order to deal with the COVID-19 emergency the bank implemented a moratorium on installments payments from March to September 2020 based on requests received by customers. On the below table a summary of the exposures subject to moratoria for each stage is presented for end of December 2020.

Loans and advances to customers
Applied for Covid-19 Moratoria
Did not apply for Covid-19 Moratoria
Total

5. Detember 2020						
Stage 1	Stage 2	Stage3	Total			
16,754,699	576,496	102,802	17,433,997			
33,114,901	140,493	2,254,192	35,509,585			
49,869,600	716,989	2,356,994	52,943,583			

31 December 2020

In addition, the bank has signed with the state of Albania two sovereign guarantees used to facilitate the credit granting to legal entities which have been impacted by the state lock down as a conservative measure derived by the pandemic or by the pandemic in overall.

The first Guarantee: "Payroll Loans Under Sovereign Guarantee (Sovereign Guarantee 1) - Limit: 900,000,000 ALL, aiming legal entities to obtain credit facilities to pay their staff employee's payroll. The second guarantee: "Credit facilities Sovereign Guarantee for Working Capital and Investments (Sovereign Guarantee 2) - Limit: 1,200,000,000 ALL aiming legal entities to obtain credit facility to finance their temporary liquidity gaps (Working Capita) or needed investments imposed by the pandemic.

7. Financial Risk Management (continued)

(a) Credit Risk

On the below table is presented a summary of the financed exposures secured by the sovereign guarantees:

	31-Dec-20				
Loans and advances to customers	Stage 1	Stage 2	Stage 3	Total	
Secured by 1st Sovereign Guarantee	482,985	0	0	482,985	
Secured by 2nd Sovereign Guarantee	461,212	0	0	461,212	
Not Secured by Sovereign Guarantee	48,925,403	716,989	2,356,994	51,999,386	
Total	49,869,600	716,989	2,356,994	52,943,583	

(i) Management of credit risk

The Board of Directors has delegated responsibility for decision-making to Committees in Credit Area. The Risk Management Division, reporting to the CEO, is responsible for the oversight and management of the Bank's credit risk, including:

- Formulating credit policies in consultation with business units, covering collateral requirements, credit assessment, risk grading and reporting, documentary and legal procedures, and compliance with regulatory and statutory requirements.
- Reviewing and assessing credit risk. The Bank's Underwriting Department assesses all credit exposures, before facilities are committed to customers by the Bank. Renewals and reviews of facilities are subject to the same review process.
- Limiting concentrations of exposure to counterparties, geographies and industries (for loans and advances), and by issuer, credit rating band, market liquidity and country (for investment securities).

7. Financial Risk Management (continued)

- (a) Credit Risk (continued)
- (i) Management of credit risk (continued)
 - Developing and maintaining the Bank's risk classifications in order to categorize exposures according to the degree of risk of financial loss faced and to focus management on the attendant risks. The risk classification is used in determining where impairment may be required against specific credit exposures.

According to the Bank's methodology, all exposures are classified between Performing (including Stage 1 and Stage 2) and Non-Performing exposures (Stage 3 - including Past Due, Unlikely to Pay and Doubtful). The bank classifies the performing portfolio in two clusters Stage 1 and Stage 2 based on a set of rules harmonized with the guidelines of Intesa Sanpaolo Group, driven by the signs of deterioration of the exposure as per below specifications:

Stage 1	Stage 2	Stage 3
 Performing exposures without days past due Performing exposures with less than 30 days 	 Performing exposures with more than 30 days past due Forborne performing exposures Performing exposures showing Early Warning signals (orange, red 	 Exposures with more than 90 days past due Unlikely to Pay Doubtful
past due	and light blue) and PCM.	

The Non-Performing portfolio is classified by analyzing the exposures also based on a set of rules harmonized with the guidelines of Intesa Sanpaolo Group. These rules include objective evidence being: breach of contract (such as default or delinquency in interest or principal payments); significant financial difficulty of the borrower; and other significant adverse financial information relating to the customer.

Starting from the 1st of November 2019, the new Definition of Default has been introduced in accordance with EBA's (European Banking Authority) Guidelines on application of the definition of default (EBA/GL/2016/07) and the Regulatory Technical Standards on the materiality threshold (EBA/RTS/2016/06) that specify how default definition should be applied. Under the new guidelines two new materiality thresholds have been introduced, a relative threshold equal to 1% of the obligor cash exposure and an absolute threshold on obligor level equal to 500 Euros for non-retail exposures and 100 Euros for retail exposures. The new days past due, used as objective criteria for Stage 2 classification (Over 30 days past due) and the Past Due Classification (Over 90 days past due), are counted incrementally when both the relative and the absolute thresholds are breached. In addition, once an obligor has defaulted, it will remain on default status for at least 90 days after no signs of default are present. Furthermore, a new trigger of Unlikeliness to Pay has been introduced for Forborne distressed restructuring which net present value has decreased with more than 1% compared to previous agreement. The New Definition of Default was accounted retrospectively starting from 1st of November 2019.

- Reviewing compliance of business units with agreed exposure limits, including those for selected industries and product types. Detailed analyses are provided monthly to the Problem Assets Committee on the credit quality of customer exposures and specific actions are proposed.
- Providing advice, guidance and specialist skills to business units to promote best practice throughout the Bank in the management of credit risk.

7. Financial Risk Management (continued)

(a) Credit Risk (continued)

(ii) Maximum Exposure to Credit Risk

The following table shows the current maximum exposure to credit risk for the applicable components of statement of financial position:

Gross Maximum Exposure		
31 December 2020	31 December 2019	
30,913,711	28,796,627	
26,736,572	29,146,303	
71,773,704	66,919,643	
50,902,837	44,864,090	
54,197	53,399	
180,381,021	169,780,062	
7,136,265	4,868,368	
199,916	1,316,966	
4,873,519	4,456,046	
12,209,700	10,641,380	
192,590,721	180,421,442	
	31 December 2020 30,913,711 26,736,572 71,773,704 50,902,837 54,197 180,381,021 7,136,265 199,916 4,873,519 12,209,700	

Where financial assets are recorded at fair value, the amounts shown represent the current credit risk exposure, but not the maximum risk exposure that could arise in the future as a result of changes in values. The Bank makes available to its customers guarantees which may require that the Bank makes payments on their behalf and enters into commitments to extend credit lines to secure their liquidity needs. Letters of credit and guarantees commit the Bank to make payments on behalf of customers in the event of a specific act or event, generally related to the import or export of goods, and payment and performance guarantees. Such commitments expose the Bank to similar credit risks, which are mitigated by the same control processes and policies. Every month, the Bank assesses the credit related commitments for impairment. Amounts subject to individual impairment assessment are non-cancellable commitments granted to non-performing customers or customers with restructured credit facilities.

7. Financial Risk Management (continued)

(a) Credit Risk (continued)

(iii) Credit Quality by class of financial assets

The following table sets out information about the credit quality of financial assets measured at amortized cost and FVOCI debt investments. Unless specifically indicated, for financial assets, the amounts in the table represent gross carrying amounts. Explanation of the terms 'Stage 1', 'Stage 2' and 'Stage 3' is included in Note 6(g)(vii).

		31 D	ecember 2020
Stage 1	Stage 2	Stage 3	Total
omers			
49,824,618	716,989	-	50,541,607
-	-	136,760	136,760
-	-	845,467	845,467
-	-	1,374,767	1,374,767
49,824,618	716,989	2,356,994	52,898,601
480,387	229,916	1,285,461	1,995,764
49,344,231	487,073	1,071,533	50,902,837
	49,824,618 - - - - 49,824,618 480,387	omers 49,824,618 716,989 49,824,618 716,989 480,387 229,916	Stage 1 Stage 2 Stage 3 omers 49,824,618 716,989 - - - 136,760 - - 845,467 - - 1,374,767 49,824,618 716,989 2,356,994 480,387 229,916 1,285,461

			31 D	ecember 2019
	Stage 1	Stage 2	Stage 3	Total
Loans and advances to cust	omers			
Performing	43,720,062	635,684	-	44,355,746
Past Due	-	-	104,414	104,414
Unlikely to Pay	-	-	1,466,978	1,466,978
Doubtful	-	-	951,266	951,266
Total	43,720,062	635,684	2,522,658	46,878,404
Loss allowance	710,117	136,858	1,167,339	2,014,314
Carrying amount	43,009,945	498,826	1,355,319	44,864,090

			31 D	ecember 2020
PD Range	Stage 1	Stage 2	Stage 3	Total
Loans and advances to custo	omers			
0-0.18	49,824,618	-	-	49,824,618
0.19-0.66	-	462,049	-	462,049
0.67-1	-	254,940	2,356,994	2,611,934
Total	49,824,618	716,989	2,356,994	52,898,601
Loss allowance	480,387	229,916	1,285,461	1,995,764
Carrying amount	49,344,231	487,073	1,071,533	50,902,837

			31 D	ecember 2019
PD Range	Stage 1	Stage 2	Stage 3	Total
Loans and advances to cust	omers			
0-0.18	43,720,062	-	2,048,023	45,768,085
0.19-0.66	-	635,684	1,317	637,001
0.67-1	-	-	473,318	473,318
Total	43,720,062	635,684	2,522,658	46,878,404
Loss allowance	710,117	136,858	1,167,339	2,014,314
Carrying amount	43,009,945	498,826	1,355,319	44,864,090

7. Financial Risk Management (continued)

(a) Credit Risk (continued)

(iii) Credit Quality by class of financial assets (continued)

*Loss allowance for investment securities at FVOCI is recognized in other comprehensive income and not as a contra account to the carrying amount of the financial asset in the statement of financial

			31 De	cember 2020
	Stage 1	Stage 2	Stage 3	Total
Loans and advances to banks				_
Performing	38,062,283	2,529,732	-	40,592,015
Total _	38,062,283	2,529,732	-	40,592,015
Loss allowance	14,022	630	-	14,652
Carrying amount	38,048,261	2,529,102	-	40,577,363
Investment securities at FVOCI				
Performing	36,836,454	734	-	36,837,189
Total	36,836,454	734	-	36,837,189
Carrying amount	146,699	3	-	146,702
Loss allowance	36,689,755	731	-	36,690,487
Investment securities at amorti	ized cost			
Performing	31,782,220	3,454,312	-	35,236,532
Total	31,782,220	3,454,312	-	35,236,532
Loss allowance	141,584	11,731	-	153,315
Carrying amount	31,640,636	3,442,581	-	35,083,217
-	<u> </u>			cember 2019
- -	Stage 1	Stage 2	31 De Stage 3	cember 2019 Total
Loans and advances to banks				Total
Performing	39,204,886	3,288,711	Stage 3	Total 42,493,597
Performing Total	39,204,886 39,204,886	3,288,711 3,288,711	Stage 3 - -	Total 42,493,597 42,493,597
Performing Total Loss allowance	39,204,886 39,204,886 8,634	3,288,711 3,288,711 608	Stage 3	Total 42,493,597 42,493,597 9,242
Performing Total	39,204,886 39,204,886	3,288,711 3,288,711	Stage 3 - -	Total 42,493,597 42,493,597
Performing Total Loss allowance	39,204,886 39,204,886 8,634	3,288,711 3,288,711 608	Stage 3 - -	Total 42,493,597 42,493,597 9,242
Performing Total Loss allowance Carrying amount	39,204,886 39,204,886 8,634	3,288,711 3,288,711 608	Stage 3 - -	Total 42,493,597 42,493,597 9,242
Performing Total Loss allowance Carrying amount Investment securities at FVOCI	39,204,886 39,204,886 8,634 39,196,252	3,288,711 3,288,711 608	Stage 3 - -	Total 42,493,597 42,493,597 9,242 42,484,355
Performing Total Loss allowance Carrying amount Investment securities at FVOCI Performing	39,204,886 39,204,886 8,634 39,196,252 4,294,799	3,288,711 3,288,711 608 3,288,103	Stage 3	Total 42,493,597 42,493,597 9,242 42,484,355 4,294,799
Performing Total Loss allowance Carrying amount Investment securities at FVOCI Performing Total	39,204,886 39,204,886 8,634 39,196,252 4,294,799 4,294,799	3,288,711 3,288,711 608 3,288,103	Stage 3	Total 42,493,597 42,493,597 9,242 42,484,355 4,294,799 4,294,799
Performing Total Loss allowance Carrying amount Investment securities at FVOCI Performing Total Carrying amount	39,204,886 39,204,886 8,634 39,196,252 4,294,799 4,294,799 5,517 4,289,282	3,288,711 3,288,711 608 3,288,103	Stage 3	Total 42,493,597 42,493,597 9,242 42,484,355 4,294,799 4,294,799 5,517
Performing Total Loss allowance Carrying amount Investment securities at FVOCI Performing Total Carrying amount Loss allowance*	39,204,886 39,204,886 8,634 39,196,252 4,294,799 4,294,799 5,517 4,289,282	3,288,711 3,288,711 608 3,288,103	Stage 3	Total 42,493,597 42,493,597 9,242 42,484,355 4,294,799 4,294,799 5,517
Performing Total Loss allowance Carrying amount Investment securities at FVOCI Performing Total Carrying amount Loss allowance* Investment securities at amorti	39,204,886 39,204,886 8,634 39,196,252 4,294,799 4,294,799 5,517 4,289,282 ized cost 60,831,517	3,288,711 3,288,711 608 3,288,103 2,107,366	Stage 3	Total 42,493,597 42,493,597 9,242 42,484,355 4,294,799 4,294,799 5,517 4,289,282 62,938,883
Performing Total Loss allowance Carrying amount Investment securities at FVOCI Performing Total Carrying amount Loss allowance* Investment securities at amorti Performing	39,204,886 39,204,886 8,634 39,196,252 4,294,799 4,294,799 5,517 4,289,282	3,288,711 3,288,711 608 3,288,103	Stage 3	Total 42,493,597 42,493,597 9,242 42,484,355 4,294,799 4,294,799 5,517 4,289,282
Performing Total Loss allowance Carrying amount Investment securities at FVOCI Performing Total Carrying amount Loss allowance* Investment securities at amorti Performing Total	39,204,886 39,204,886 8,634 39,196,252 4,294,799 4,294,799 5,517 4,289,282 ized cost 60,831,517 60,831,517	3,288,711 3,288,711 608 3,288,103 2,107,366 2,107,366	Stage 3	Total 42,493,597 42,493,597 9,242 42,484,355 4,294,799 4,294,799 5,517 4,289,282 62,938,883 62,938,883

position (see Note 7 (g) (vii) Presentation of allowance for ECL in the statement of financial position).

^{**}Loans and advances to banks include current accounts with banks, money market placements (see Note 10) and deposits with correspondent banks (see Note 11).

7. Financial Risk Management (continued)

(a) Credit Risk (continued)

(iii) Credit Quality by class of financial assets (continued)

The following table sets out information about the overdue status of loans and advances to customers in Stages 1, 2 and 3.

			31 De	cember 2020
Loans and advances to customers	Stage 1	Stage 2	Stage3	Total
Up to 30 days in arrears	49,824,618	341,198	568,750	50,734,566
More than 30 days in arrears	-	375,790	1,788,244	2,164,034
Total	49,824,618	716,988	2,356,994	52,898,600
			31 De	cember 2019
Loans and advances to customers	Stage 1	Stage 2	Stage3	Total
Up to 30 days in arrears	43,720,062	417,094	553,401	44,690,557
More than 30 days in arrears		218,590	1,969,257	2,187,847
Total	43,720,062	635,684	2,522,658	46,878,404

All loans and advances to banks and investment securities fall in the overdue status of less than 30 days in arrears as of 31 December 2020 and 31 December 2019.

The following table sets out the credit quality of debt securities and loans and advances to banks based on Moody's ratings, Staging and IFRS Category:

based on moody's racings, staging	Investments debt securities	5	
Sovereign			31 December 2020
_	Stage 1	Stage 2	Total
Rate Baa2	2,885,166	1,933,978	4,819,144
FVOCI	2,885,166	-	2,885,166
AC	<u> </u>	1,933,978	1,933,978
Rate B1	64,748,634	1,509,334	66,257,968
FVOCI	33,107,998	731	33,108,729
AC	31,640,636	1,508,603	33,149,239
	67,633,800	3,443,312	71,077,112
	Financial Institutions		
	Stage 1	Stage 2	Total
Rated Aaa	696,592	-	696,592
FVOCI	696,592	-	696,592
Total carrying amount	68,330,392	3,443,312	71,773,704
	Investments debt securities	5	
Sovereign	Investments debt securities	5	31 December 2019
Sovereign	Stage 1	Stage 2	Total
Sovereign Rate Baa2			
Rate Baa2 FVOCI	Stage 1	Stage 2 2,100,772	Total 4,927,780 2,827,008
Rate Baa2 FVOCI AC	Stage 1 2,827,008 2,827,008	Stage 2	Total 4,927,780
Rate Baa2 FVOCI AC Rate B1	Stage 1 2,827,008 2,827,008 - 61,251,450	Stage 2 2,100,772	Total 4,927,780 2,827,008 2,100,772 61,251,450
Rate Baa2 FVOCI AC Rate B1 FVOCI	Stage 1 2,827,008 2,827,008 - 61,251,450 721,861	Stage 2 2,100,772	Total 4,927,780 2,827,008 2,100,772 61,251,450 721,861
Rate Baa2 FVOCI AC Rate B1	Stage 1 2,827,008 2,827,008 - 61,251,450 721,861 60,529,589	Stage 2 2,100,772 - 2,100,772 - -	Total 4,927,780 2,827,008 2,100,772 61,251,450 721,861 60,529,589
Rate Baa2 FVOCI AC Rate B1 FVOCI	Stage 1 2,827,008 2,827,008 - 61,251,450 721,861	Stage 2 2,100,772	Total 4,927,780 2,827,008 2,100,772 61,251,450 721,861
Rate Baa2 FVOCI AC Rate B1 FVOCI	Stage 1 2,827,008 2,827,008 - 61,251,450 721,861 60,529,589	Stage 2 2,100,772 - 2,100,772 - -	Total 4,927,780 2,827,008 2,100,772 61,251,450 721,861 60,529,589
Rate Baa2 FVOCI AC Rate B1 FVOCI	Stage 1 2,827,008 2,827,008 - 61,251,450 721,861 60,529,589 64,078,458	Stage 2 2,100,772 - 2,100,772 - -	Total 4,927,780 2,827,008 2,100,772 61,251,450 721,861 60,529,589
Rate Baa2 FVOCI AC Rate B1 FVOCI	Stage 1 2,827,008 2,827,008 - 61,251,450 721,861 60,529,589 64,078,458 Financial Institutions	Stage 2 2,100,772 - 2,100,772 - 2,100,772 - 2,100,772	Total 4,927,780 2,827,008 2,100,772 61,251,450 721,861 60,529,589 66,179,230
Rate Baa2 FVOCI AC Rate B1 FVOCI AC	Stage 1 2,827,008 2,827,008 - 61,251,450 721,861 60,529,589 64,078,458 Financial Institutions Stage 1	Stage 2 2,100,772 - 2,100,772 - 2,100,772 - 2,100,772	Total 4,927,780 2,827,008 2,100,772 61,251,450 721,861 60,529,589 66,179,230 Total 740,413
Rate Baa2 FVOCI AC Rate B1 FVOCI AC	Stage 1 2,827,008 2,827,008 61,251,450 721,861 60,529,589 64,078,458 Financial Institutions Stage 1 740,413	Stage 2 2,100,772 - 2,100,772 - 2,100,772 - 2,100,772	Total 4,927,780 2,827,008 2,100,772 61,251,450 721,861 60,529,589 66,179,230 Total 740,413

7. Financial Risk Management (continued)

(a) Credit Risk (continued)

(iii) Credit Quality by class of financial assets (continued)

Loans and advances to Banks

		31	December 2020
	Stage 1	Stage 2	Total
Rated Aa1	3,951,970	-	3,951,970
Rated Aa2	-	-	-
Rated Aa3	9,931	-	9,931
Rated A1	33,642	27,427	61,070
Rated A2	1,583,179	-	1,583,179
Rated A3	2,383,725	-	2,383,725
Rated Baa1	18,329,101	2,501,674	20,830,775
Rated Baa2	27,268	-	27,268
Rated Baa3	2,961,349	-	2,961,349
Rated Ba2	5,001,598	-	5,001,598
Rated Ba3	-	-	-
Rated B1	-	-	
Rated B2	-	-	-
Rated B3	615,373	-	615,373
Rated CAA	-	-	-
Non rated	3,151,125	-	3,151,125
	38,048,261	2,529,101	40,577,363

31 December 2019

Stage 1	Stage 2	Total
-	-	-
-	-	
13,762	-	13,762
7,764,149	-	7,764,149
5,962,337	3,239,897	9,202,234
-	-	-
-	48,814	48,814
20,891,230	-	20,891,230
2,496,226	-	2,496,226
1,094,419	-	1,094,419
800,104	-	800,104
-	-	-
182,660	-	182,660
-	-	-
39,204,887	3,288,711	42,493,598
	13,762 7,764,149 5,962,337 - - 20,891,230 2,496,226 1,094,419 800,104 - 182,660	13,762

7. Financial Risk Management (continued)

(a) Credit Risk (continued)

(iv) Collateral held and other credit enhancements

The estimated cash flows derived from the collateral, including guarantees securing the exposures, are usually the main source of future cash flows from non-performing loans. Some of the valuation parameters used for the calculation are:

- Realizable value of collaterals, which is estimated by reducing the appraised market value of
 the collateral with a discount factor. This considers the characteristics of similar groups of
 collaterals. It presumes an average recoverable value of specific collateral, based on the Bank's
 experience.
- Timing of the expected cash flow, which represents the expected recovery time (in years) for a specific type of collateral.

The recovery costs are deducted from estimated future cash flows. Collateral, generally, is not held over loans and advances to financial institutions, except when securities are held as part of reverse repurchase and securities borrowing activity. Usually, collateral is not held against investment securities, and no such collateral was held at 31 December 2020 and 2019. Estimates of fair value are based on the value of collateral assessed at the time of borrowing and are updated every three years. An estimate of the undiscounted and discounted fair value of collaterals and other security enhancements held against financial assets is shown below:

	Collateral of Loans and advances to customers		Collateral of Loans and advances to customers 31 December 2019	
	31 December 2020		Undiscounted	
	Undiscounted	Discounted	Unaiscountea	Discounted
Against individually impair	red			
Property	4,515,057	1,456,225	4,765,766	1,709,133
Debt securities	39,700	-	421,236	1,523
Cash	-	-	193	193
Pledges and guarantees	295,110	-	39,700	-
Other		-	-	
Total	4,849,867	4,849,867 1,456,225		1,710,849
Net carrying amount		898,220		1,355,319

The gross amount of collaterals includes the value of collaterals before testing the individually impaired loans. The net amount shows the present value of the same collaterals under this test. The table below shows the total amount of collaterals for the loans assessed under the category of collectively impaired including all the Stage 3 exposures that are lower than EUR 100 thousand.

These collaterals do not undergo the same testing procedures as the above group. The information on the table below provides information on how much the collectively impaired loans and advances to customers are secured against their respective collaterals.

	Collateral of Loans and advances to customers 31 December 2020		Collateral of Loans and advances to customers 31 December 2019			
	Undiscounted	Discounted	Undiscounted	Discounted		
Against Collectively Impaired						
Property	80,879,648	36,155,755	79,525,887	34,465,256		
Pledges and guarantees	43,960,488	1,984,816	19,023,744	1,483,977		
Cash	791,352	759,767	1,381,122	1,331,340		
Debt securities	1,681,404	54,559	2,604,292	42,981		
Other	1,092,724	-	1,204,056	-		
Total	128,405,616	38,954,897	103,739,101	37,323,554		
Net carrying amount		44,869,755		43,508,771		

7. Financial Risk Management (continued)

(a) Credit Risk (continued)

(iv) Collateral held and other credit enhancements (continued)

It is the Bank's policy to dispose of assets repossessed through the recovering process. The amounts collected from the proceeds are used to reduce or liquidate the carrying amount of the nonperforming loans.

The table below sets out the carrying amount and the value of undiscounted collateral of the loans and advances to customers measured at amortized cost.

	31 December 2020		31 December 2019	
	Carrying amount	Collateral	Carrying amount	Collateral
Stage 1 and Stage 2	49,831,304	128,405,616	44,355,746	102,462,453
Stage 3	1,071,533	4,849,868	2,522,658	6,503,543
	50,902,837	133,255,484	46,878,404	108,965,996

When the Bank holds repossessed assets in its ownership, their conversion into cash is the Bank's first aim, through marketing the properties for sale. If there is no satisfactory offer collected, the Bank's practice is to keep the asset for sale until receiving the best offer. The amounts of repossessed properties are disclosed in note 18. Depending on operational needs and the suitability of the asset to fulfill those needs, management may decide to make use of the property; in such cases a reclassification into property and equipment (see note 14) of the Bank is performed.

(v) Amounts arising from ECL

Inputs, assumptions and techniques used for estimating impairment

See accounting policy in Note 6.(f).(vii).

Significant increase in credit risk

When determining whether the risk of default on a financial instrument has increased significantly since initial recognition, the Bank considers reasonable and supportable information that is relevant and available without undue cost or effort. This includes both quantitative and qualitative information and analysis, based on the Bank's historical experience and expert credit assessment and including forward-looking information. The objective of the assessment is to identify whether a significant increase in credit risk has occurred for an exposure by comparing:

- the remaining lifetime probability of default (PD) as at the reporting date; with
- the remaining lifetime PD for this point in time that was estimated at the time of initial recognition of the exposure (adjusted where relevant for changes in prepayment expectations).

The Bank uses three criteria for determining whether there has been a significant increase in credit

- quantitative test based on movement in PD, for loans to banks and investment securities only;
- qualitative indicators based on forbearance and early warning signals; and
- a backstop of 30 days past due.

New Definition of default

The Bank considers a financial asset to be in default when:

- the borrower is in a state of insolvency (even though not legally insolvent) or in a de facto equivalent status. By "state of insolvency" the following shall be intended: structural and permanent (not transitory) inability to satisfy, regularly and through ordinary sources, the Counterparty's obligations due to lack of liquidity and/or access to external funding
- the borrower is unlikely to pay its credit obligations to the Bank in full, without recourse to actions such as the enforcement of guarantees/ collateral.
- the borrower is more than 90 days past due as described in note 7(a)(i).

- 7. Financial Risk Management (continued)
- (a) Credit Risk (continued)
- (v) Amounts arising from ECL (continued)

Incorporation of forward-looking information

The Bank incorporates forward-looking information into the measurement of ECL. The Bank has identified and documented key drivers of credit risk and credit losses for each portfolio of financial instruments and, using an analysis of historical data, has estimated relationships between EBA (European Banking Authority) stress coefficients and credit losses. The Bank considers three economic scenarios: baseline, adverse scenario, as published by EBA, and best scenario, an internal estimate as a symmetrical reflection of adverse scenario toward baseline one.

Modified financial assets

The contractual terms of a loan may be modified for a number of reasons, including changing market conditions, customer retention and other factors not related to a current or potential credit deterioration of the customer. An existing loan whose terms have been modified may be derecognized and the renegotiated loan recognized as a new loan at fair value in accordance with the accounting policy set out in Note 6 (f)(iv).

Measurement of ECL (Expected Credit Losses)

The framework, IFRS 9 (International Financial Reporting Standard) - Financial Instruments, is based on the estimation of expected losses, different from the incurred losses used under IAS 39. When significant deterioration of the credit quality is recognized, the new concept of Lifetime expected loss is introduced. Lifetime expected loss covers expected loss for the whole IFRS 9 specifies that if the credit risk on a financial instrument has increased significantly since initial recognition, an entity shall measure the loss allowance for that financial instrument at an amount equal to Lifetime expected credit losses and if the credit risk on such instrument has not increased significantly, 12-months expected losses should be calculated instead.

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

The Bank employs statistical models to analyze the data collected and generate estimates of the remaining lifetime PD of exposures and how these are expected to change as a result of the passage of time. The Bank collects performance and default information about its credit risk exposures analyzed by type of product and borrower as well as by credit risk grading. For some portfolios, information purchased from external credit reference agencies is also used.

LGD is the magnitude of the likely loss if there is a default. The Bank estimates LGD parameters based on the history of loss rates from defaulted counterparties. The LGD models consider the structure, collateral, seniority of the claim, counterparty industry and recovery costs of any collateral that is integral to the financial asset. For loans secured by retail property, LTV ratios are a key parameter in determining LGD. LGD estimates are calculated on a discounted cash flow basis using the effective interest rate as the discounting factor.

EAD represents the expected exposure in the event of a default. The Bank derives the EAD from the current exposure to the counterparty and potential changes to the current amount allowed under the contract and arising from amortization. The EAD of a financial asset is its gross carrying amount at the time of default. For lending commitments, the EADs are potential future amounts that may be drawn under the contract, which are estimated based on historical observations and forward-looking forecasts.

- 7. Financial Risk Management (continued)
- (a) Credit Risk (continued)
- (v) Amounts arising from ECL (continued)

Inputs, assumptions and techniques used for estimating impairment (continued)

Measurement of ECL (Expected Credit Losses) (continued)

Low Default Portfolio

A new category of financial instruments are considered for impairment purposes under the IFRS 9 rules, called "Low Default Portfolio". It includes securities and loans to banks, and as defined by Parent Company consists of exposures with the following parties:

- Sovereign (Central Banks, Governments, Municipalities, Public Sector Entities);
- Institutions (Banks, and other financial institutions); Intragroup exposures are exposures with the following parties:
- Parent Company;
- Other ISP subsidiaries.

Intragroup transactions are generally classified as Stage 1 with a 12- months ECL following the staging rules for Low Default Portfolio and intragroup exposures based on parent company driven methodologies including validation. Exposures are classified to Stage 2 based on the significant increase of credit risk criterion measured by Lifetime PD comparison. This criterion for Low Default Portfolio is defined based on the specific rating and residual maturity of exposure. Thresholds are provided by Parent Company.

The criteria used to access whether the debt securities credit quality deteriorated significantly since origination is Lifetime PDs comparison. The instrument issuer rating (counterparty rating) is used for the Lifetime PD comparison rather than rating of the single instrument (i.e. at the reporting date different instruments or tranches related to the same issuer will be assigned with the rating of the counterparty at a given date). Debt securities purchased in tranches PD at origination is determined through First In First Out (FIFO) methodology.

Debt securities include "Low Credit Risk Exemption" based on the assumption that the credit risk on has not increased significantly since initial recognition if the financial instrument is determined to have low credit risk at the reporting date. Therefore, Investment grade instruments at the reporting date are classified to Stage 1. This exemption is applicable only for instruments belonging to Available For Sale (AFS) portfolio upon the IFRS 9 transition. The following criteria are approved for each stage for Bonds residual maturity of the financial instrument.

Stage 1	Stage 2	Stage 3
Debt with no significant credit quality deterioration Investment grade debts	 Debt with significant increase in PD since origination 	Defaulted Debt

For Stage 3 - Defaulted debt the impairment testing process for any individually securities is applied. If the fair value is less than the carrying amount or if the issuer is delinquent in its debtor obligations or defaults on payments as demonstrated by any one of the following events:

- 1. Default:
- 2. Bankruptcy proceedings;
- 3. Delinquency in interest or principal payments.

Where any one of these events occurs, given the gravity and the irreversibility of the confirmed situation, an impairment loss should be recorded directly. If the fair value is not more than 20% less than the carrying amount and no other impairment indicators are found, there is no need to test the securities further for impairment. The impairment test for this stage classification is performed according to the rules defined in the ISP Group accounting policy

Both collective assessment and individual assessment on portfolio basis are approaches to impairment evaluation based on statistical methods by using credit risk parameters which are estimated based on historical data for homogenous groups of assets.

7. Financial Risk Management (continued)

- (a) Credit Risk (continued)
- (v) Amounts arising from ECL (continued)

Loss allowances

The Bank establishes an allowance for impairment losses that represents its estimate of incurred losses in its loan portfolio. The main components of this allowance are a specific loss component that relates to individually significant exposures, as well as collectively assessed and less significant exposures, and a collective loan loss allowance established for groups of homogeneous assets in respect of expected losses that have not been identified.

The following tables show reconciliations from the opening to the closing balance of the loss allowance by class of financial instrument.

Movements in impairment allowance funds for:

Loans and advances to banks	Stage 1	Stage 2	Stage 3	Total
Balances at 1 January 2020	9,509	6,539	-	16,048
Transfer to Stage 1	-	-	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
Financial Assets that have been derecognized	(6,488)	-	-	(6,488)
Net remeasurement of loss allowances	1,155	(5,880)	-	(4,725)
New financial assets originated or purchased	4,538	-	-	4,538
Foreign exchange and other movements	(80)	(51)	-	(131)
Balances at 31 December 2020	8,634	608	-	9,242
Loans and advances to banks	Stage 1	Stage 2	Stage 3	Total
Balances at 1 January 2019	62,923	15,202	-	78,125
Transfer to Stage 1	-	-	-	_
Transfer to Stage 2	-	-	-	-
Transfer to Stage 2 Transfer to Stage 3	-	-	-	-
•	- - (8,579)	- - -	- - -	- - (8,579)
Transfer to Stage 3	- - (8,579) (50,589)	- - - (12,592)	- - -	- (8,579) (63,181)
Transfer to Stage 3 Financial Assets that have been derecognized	(, ,	- - (12,592) 4,306		
Transfer to Stage 3 Financial Assets that have been derecognized Net remeasurement of loss allowances	(50,589)	` ' '	- - - -	(63,181)

7. Financial Risk Management (continued)

(a) Credit Risk (continued)

(v) Amounts arising from ECL (continued)

Investment securities at FVOCI	Stage 1	Stage 2	Stage 3	Total
Balances at 1 January 2020	5,517	-	-	5,517
Transfer to Stage 1	-	-	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
Financial Assets that have been derecognized	(5,517)	-	-	(5,517)
Net remeasurement of loss allowances	-	-	-	-
New financial assets originated or purchased	146,903	3	-	146,906
Foreign exchange and other movements	(204)	-	-	(204)
Balances at 31 December 2020	146,699	3	-	146,702
Investment securities at FVOCI	Stage 1	Stage 2	Stage 3	Total
Balances at 1 January 2019	4,629	-	-	4,629

Investment securities at FVOCI	Stage 1	Stage 2	Stage 3	Total
Balances at 1 January 2019	4,629	-	-	4,629
Transfer to Stage 1	-	-	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
Financial Assets that have been derecognized	(2,077)	-	-	(2,077)
Net remeasurement of loss allowances	(169)	-	-	(169)
New financial assets originated or purchased	3,158	-	-	3,158
Foreign exchange and other movements	(24)	-	-	(24)
Balances at 31 December 2019	5,517	-	-	5,517

Investment securities at amortized cost	Stage 1	Stage 2	Stage 3	Total
Balances at 1 January 2020	301,928	6,594	-	308,522
Transfer to Stage 1	-	-	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
Financial Assets that have been derecognized	(301,928)	(6,594)	-	(308,522)
Net remeasurement of loss allowances	-	-	-	-
New financial assets originated or purchased	141,706	12,215		153,921
Foreign exchange and other movements	(122)	(484)	-	(606)
Balances at 31 December 2020	141,584	11,731	-	153,315

Investment securities at amortized cost	Stage 1	Stage 2	Stage 3	Total
Balances at 1 January 2019	265,837	7,801	-	273,638
Transfer to Stage 1	-	-	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
Financial Assets that have been derecognized	(88,037)		-	(88,037)
Net remeasurement of loss allowances	(25,823)	(1,266)	-	(27,089)
New financial assets originated or purchased	150,137		-	150,137
Foreign exchange and other movements	(186)	59	-	(127)
Balances at 31 December 2019	301,928	6,594	-	308,522

7. Financial Risk Management (continued)

(a) Credit Risk (continued)

(v) Amounts arising from ECL (continued)

Loans and advances to customers	Stage 1	Stage 2	Stage 3	Total
Balances at 1 January 2020	710,116	136,858	1,167,339	2,014,313
Transfer to Stage 1	20,548	(7,784)	(12,764)	-
Transfer to Stage 2	(40,679)	67,512	(26,834)	-
Transfer to Stage 3	(13,385)	(5,856)	19,241	-
Financial Assets that have been derecognized	(155,358)	(10,423)	(51,845)	(217,625)
Net remeasurement of loss allowances	(121,669)	7,195	111,773	(2,701)
New financial assets originated or purchased	68,464	42,180	244,951	355,595
Write offs	-	-	(166,722)	(166,722)
Foreign exchange and other movements	12,350	234	321	12,905
Balances at 31 December 2020	480,387	229,916	1,285,461	1,995,764

_	Stage 1	Stage 2	Stage 3	Total
Balances at 1 January 2019	663,165	456,354	1,452,175	2,571,694
Transfer to Stage 1	(218,731)	77,027	141,704	-
Transfer to Stage 2	3,769	(300,063)	296,294	-
Transfer to Stage 3	451	3,978	(4,429)	-
Financial Assets that have been derecognized	(82,111)	(188,125)	(99,121)	(369,357)
Net remeasurement of loss allowances	89,053	46,706	15,336	151,095
New financial assets originated or purchased	257,528	42,957	90,319	390,804
Write offs	-	-	(696,935)	(696,935)
Foreign exchange and other movements	(3,008)	(1,976)	(28,004)	(32,988)
Balances at 31 December 2019	710,116	136,858	1,167,339	2,014,313

The following table provides for the year 2020 a reconciliation between:

amounts shown in the above tables reconciling opening and closing balances of loss allowance per class of financial instrument; and

	Loans and advances to banks	Loans and advances to customers	Investment securities at FVOCI	Investment securities at amortized cost	Total
Net remeasurement of loss allowance New financial assets	2,138	220,327	5,517	308,522	536,504
originated or purchased	(6,961)	(355,595)	(146,906)	(153,921)	(663,383)
Balances at 31 December 2020	(4,823)	(135,268)	(141,389)	154,601	(126,879)
	Loans and advances to banks	Loans and advances to customers	Investment securities at FVOCI	Investment securities at amortized cost	Total
Net remeasurement of loss allowance New financial assets originated or	advances	advances to	securities	securities at	Total 346,846
of loss allowance	advances to banks	advances to customers	securities at FVOCI	securities at amortized cost	

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Notes to the financial statements for the year ended 31 December 2020

(in thousands of Lek, unless otherwise stated)

7. Financial Risk Management (continued)

- (a) Credit Risk (continued)
- (vi) Write-off policy

The Bank writes off a loan (and any related allowances for impairment losses) when the Bank's Board of Directors determines that the loans are uncollectible. This is generally the case when the Board of Directors determines that significant changes in 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. The Bank's policy is also in compliance with the Regulation no.62 "On Administration of Credit Risk for Banks and Foreign Banks Subsidiaries".

7. Financial Risk Management (continued)

(a) Credit Risk (continued)

(vii) Concentration of Credit Risk

The Bank monitors concentration of credit risk by sector and location. An analysis of credit risk at the reporting date is shown below:

Net	Loans	and	advances	to	cust	omers
	_					_

Concentration by sector	31 December 2020	31 December 2019		
Services	17,690,334	14,994,397		
Wholesale	10,491,366	8,957,759		
Construction	2,177,959	2,464,497		
Manufacturing	5,962,678	5,578,467		
Real Estate	379,108	487,818		
Other	1,603,084	1,539,817		
Corporate	38,304,529	34,022,755		
Mortgage	10,141,005	8,521,717		
Consumer	2,457,303	2,319,618		
Retail	12,598,308	10,841,335		
Carrying amount	50,902,837	44,864,090		
	Loans and advan	ces to banks		
Concentration by sector	31 December 2020	31 December 2019		
Bank	26,736,572	29,146,303		
Carrying amount	26,736,572	29,146,303		
	Investment securities			
Concentration by sector	31 December 2020	31 December 2019		
Sovereign	71,077,112	66,179,213		
Bank	0	-		
Other Financial Institutions	696,592	740,430		
Carrying amount	71,773,704	66,919,643		

The following concentrations of credit risk arise in the Bank's credit-risk portfolio.

	31 December 2020	Exposure In %	31 December 2019	Exposure In %
Republic of Albania securities	66,257,971	36%	58,773,316	34%
Balances with Bank of Albania	17,072,920	9 %	15,458,575	9 %
Total direct Albanian	83,330,891	45%	74,231,891	43%
Sovereign risk				
Largest bank	16,025,744	9 %	16,564,712	10%
Largest customer	4,592,685	3%	3,256,625	2%
Total largest bank and customer	20,618,429	12%	19,821,337	12%
Total on-balance-sheet risk	103,949,320	57%	94,053,228	55%

The largest exposure toward the banks is exposure to the Group parent and the largest customer is a private company.

7. Financial Risk Management (continued)

(a) Credit Risk (continued)

(viii) Settlement risk

The Bank's activities may give rise to risk at the time of settlement of transactions and trades. Settlement risk is the risk of loss due to the failure of a company to honor its obligations to deliver cash, securities or other assets as contractually agreed. The settlement risk with financial institutions and government counterparties is included within a system of limits for all the transactions with such counterparties and is subject to daily monitoring, defined and regulated in the internal documents "ISBA Credit Autonomy Level" and "ISBA Rules for the management and maintenance of the FI-s limits" and the Central Bank of Albania regulation "On risk management arising from the large exposures of the Bank".

The Bank of Albania regulation "On risk management arising from the large exposures of Bank" was revised in force in March 2015 has been complied for the year ended 31 December 2020. Following the approval with the aim to prevent any breaches of local regulatory counterparty limits with Financial Institutions, generated by fluctuations of exchange rates, the bank has integrated warning level limits (soft limits), 23.4 % of regulatory capital for the exposures toward ISP Group and 18.7 % of regulatory capital for the exposures toward other Financial Institutions/Governments, as approved by FRCO on 24 January 2017 and reapproved the same level of soft limits by ALCO 21 March 2019.

(b) Liquidity Risk

Liquidity risk is defined as the possibility that an institution is unable to meet its payment obligations due to its incapacity to liquidate assets or obtain adequate funding from the market (funding liquidity risk), or due to the difficulty of easily unwinding positions in financial assets without negatively and significantly affecting their price due to inadequate market depth or temporary market disruptions.

(i) Management of liquidity risk

The Bank's approach to managing liquidity risk is to ensure, as much as possible, that it will always have sufficient liquidity to meet its liabilities when due, under both normal and stressed conditions, without incurring unacceptable losses or risking damage to the Bank's reputation. The Bank defines the guidelines for liquidity risk management and the contingency liquidity plan, which are subject to review by Group structures and approval by the Bank's Financial Risk Committee and Board of Directors. The Treasury and ALM Department is responsible for liquidity management and the Risk Management Division is responsible for monitoring indicators and verifying adherence to the limits and the Bank's Regulation on Liquidity Risk Management is annually updated.

The Bank monitors liquidity, in accordance with this regulation, in order to manage its obligations when they fall due and activate emergency procedures in case of escalation.

A balanced ratio should be maintained between incoming sources and outflows, in both the short and medium-long term. This target is organized through the use of the following specific metrics "Liquidity Coverage Ratio up to 30 days" and "Net Stable Funding Ratio".

- Liquidity Coverage Ratio (LCR) up to 30 days: aims to ensure that the Bank maintains an adequate level of unencumbered high-quality liquid assets (HQLA) to meet its short-term liquidity needs under liquidity stress scenario (LCR≥105%).
- Net Stable Funding Ratio (NSFR): aims to guarantee an adequate liquidity position over a medium/long-term time horizon. It establishes a minimum "acceptable" amount of funding over one-year horizon in relation to the needs arising from the liquidity characteristics and the residual maturities of assets and off-balances exposures (NSFR≥102.5%).

Holding reserves of liquid assets (so-called Liquidity Buffer) is one of the main tools for mitigating liquidity risk. For the purpose of identifying and measuring this risk, both short and medium-long term, the classification of highly-liquid assets takes on crucial importance.

7. Financial Risk Management (continued)

(b) Liquidity Risk (continued)

(i) Management of liquidity risk (continued)

In its Liquidity Policy, the Bank projects an LCR indicator of up to 3 months by including the estimated market effect of specific acute liquidity tensions (at bank level) combined with a widespread and general market crisis, based on assumptions provided by the Group's guidelines, LCR up to 3 months≥90. This indicator was on force up to December 2020, and it was substituted by a new indicator "Survival Period" under Baseline and Stress Scenario. Under the stressed condition, the "Survival Period" should be always positive at least up to 90 days.

A similar, but not identical, calculation is used to measure the Bank's compliance with the liquidity limits established by the Bank of Albania, which should be above 20% for all currencies and foreign currencies and above 15% for the local currency.

A new indicator is introduced by the Bank of Albania, LCR as per Banka of Albania (BOA) regulation requirements. The limits for LCR BOA entered in force on 1 March 2020 and are as below:

A limit of total currencies is defined at least 100% and for total significant foreign currencies with a gradually implementation as below:

- LCR TOTAL SIGNIFICANT CURRENCY
- 1st of Mar 2020 50%
- 1st of Jan 2021 70%
- 1st of Jan 2022 80%

in accordance with risk appetite framework, the bank should decide internal limits for Lek and each significant currency (Eur and USD). The limits of LCR in LEK, USD and EUR were decided yet on August 2020 and will be in line with the limit of LCR FCY, 50% for 2020, 70 for 2021 and 80% for 2022.

(ii) Compulsory reserve

On 7 February 2018 Bank of Albania approved the decision no.14 for the change on the Compulsory Reserve requirement. These changes have entered in force during June 2018 up to August 2019 and consist of the following:

- Decrease for the obligatory reserve requirement rate for local currency liabilities to 7.5% and 5% (previous rate applied: 10%).
- The new obligatory reserve requirement rate for foreign currency liabilities is 12.5% and 20%. Liabilities in foreign currency up to 50% of the total liabilities have a 12.5% requirement rate and for the part of above 50% of the total liabilities the requirement rate is 20% (previous rate applied: 10%).

All the above liquidity ratios are periodically monitored by the Bank with reference to the Group internal limits and guidelines and to the Bank of Albania requirements. During the year 2020, the bank has been within the internal and regulatory limits.

7. Financial Risk Management (continued)

(b) Liquidity Risk (continued)

The table enclosed is only for representative purposes and shows breakdown by the earliest contractual residual maturity of financial assets and liabilities. The classification of securities portfolio in Level 1 is done based on the criteria's defined in ISBA Liquidity Risk policy. The other securities are positioned as per left maturity, since are considered as not liquid assets. Behavioral coefficients of ISP Group are applied for the drawdown percentages for off-balance-sheet categories such as committed credit lines and guarantees. The breakdown considers the cash flows in/out of the Bank for on and off-balance-sheet financial assets and liabilities, according to the earliest contractual residual maturity and not reflecting any retention history assumptions or earlier repayment. The expected cash flows differ from this representation, for example the current account from customers are expected to be stable or to be increased.

31 December 2020	Up to 1 month	1-3 months	3-12 months	1-5 years	> 5 years	Total
Assets (Cash Flow IN)	102,882,562	17,322,864	16,459,873	47,883,656	14,497,399	199,046,354
Net Cash	1,503,763	-	-	-	-	1,503,763
Minimum reserve requirements	-	-	-	16,207,078	-	16,207,078
Advances to banks	14,474,947	-	-	-	-	14,474,947
Investment Securities	62,836,512	-	-	-	-	62,836,512
Other Investment Securities	167,730	8,894,176	1,209,094	10,800,086	795,697	21,866,783
Loans to banks	10,960,420	6,995,150	7,237,197	-	-	25,192,767
Loans and advances to customers (gross performing						
loans)	12,939,190	1,433,538	8,013,582	20,876,492	13,701,702	56,964,504
31 December 2020						
Liabilities (Cash flow OUT)	(112,500,550)	(8,749,685)	(22,768,840)	(19,199,127)	(186,169)	(163,404,371)
Deposits from banks and customers- Current	(107,338,175)	_	-	-	-	(107,338,175)
accounts						
Current accounts with banks	(20,695)	-	-	-	-	(20,695)
Current accounts with customers	(107, 317, 480)	-	-	-	-	(107,317,480)
Deposits from banks	(1,679,382)	-	-	-	-	(1,679,382)
Deposits from customers- Time deposits	(3,482,993)	(8,749,685)	(22,768,840)	(19,199,127)	(186,169)	(54,386,814)
Total gap on-balance sheet	(9,617,988)	8,573,179	(6,308,967)	28,684,529	14,311,230	35,641,983
Off-Balance sheet (Cash flow in)	-	-	-	-	-	-
Off- Balance sheet (Cash flow out)	(332,357)	-	-	-	-	(332,357)
Total gap off-balance sheet	(332,357)	-	-	-	-	(332,357)
Total gap 31 December 2020	(9,950,345)	8,573,179	(6,308,967)	28,684,529	14,311,230	35,309,626
Cumulated gap 31 December 2020	(9,950,345)	(1,377,166)	(7,686,133)	20,998,396	35,309,626	-

7. Financial Risk Management (continued)

(b) Liquidity Risk (continued)

31 December 2019	Up to 1 month	1-3 months	3-12 months	1-5 years	> 5 years	Total
Assets (Cash Flow IN)	96,851,459	17,207,028	17,337,804	42,945,476	13,194,228	187,535,995
Net Cash	1,444,030	-	-	-	-	1,444,030
Minimum reserve requirements	-	-	-	15,462,646	-	15,462,646
Advances to banks	15,469,686	-	-	-	-	15,469,686
Investment Securities	58,898,355	-	-	-	-	58,898,355
Other Investment Securities	249,589	6,917,706	2,106,637	7,854,245	2,227,022	19,355,199
Loans to banks	8,358,483	9,046,721	9,624,816	-	-	27,030,020
Loans and advances to customers (gross performing	12,431,316	1,242,601	5,606,351	19,628,585	10,967,206	49,876,059
loans)						
31 December 2019						
Liabilities (Cash flow OUT)	(100,062,308)	(9,548,652)	(25,982,861)	(19,459,282)	(200,977)	(155,254,080)
Deposits from banks and customers- Current accounts	(93,661,120)	-	-	-	-	(93,661,120)
Current accounts with banks	(48,146)	-	-	-	-	(48,146)
Current accounts with customers	(93,612,974)	-	-	-	-	(93,612,974)
Deposits from banks	(2,074,049)	-	-	-	-	(2,074,049)
Deposits from customers- Time deposits	(4,327,139)	(9,548,652)	(25,982,861)	(19,459,282)	(200,977)	(59,518,911)
Total gap on-balance sheet	(3,210,849)	7,658,376	(8,645,057)	23,486,194	12,993,251	32,281,915
Off-Balance sheet (Cash flow in)	-	-	-	-	-	-
Off- Balance sheet (Cash flow out)	(281,462)	-	-	-	-	(281,462)
Total gap off-balance sheet	(281,462)	-	-	-	-	(281,462)
Total gap 31 December 2019	(3,492,311)	7,658,376	(8,645,057)	23,486,194	12,993,251	32,000,453
Cumulated gap 31 December 2019	(3,492,311)	4,166,065	(4,478,992)	19,007,202	32,000,453	-

7. Financial Risk Management (continued)

(b) Liquidity Risk (continued)

The information provided relates to cash flows deriving from financial off-balance-sheet liabilities, therefore it considerably differs from the face of the statement of financial position. The analysis does not include non-financial liabilities and equity, and comprises of cash flows of contractual interest

The table below shows the Bank's financial contingent liabilities and financial commitments.

	1	1-3	3-12	1-5	>5	Total
31 December 2020	Month	Months	Months	Years	Years	
Commitments	4,868,368	-	-	-	-	4,868,368
Guarantees	5,773,011	-	-	-	-	5,773,011
31 December 2019						
Commitments	4,378,023	-	-	-	-	4,378,023
Guarantees	5,193,902	-	-	-	-	5,193,902

The Bank expects only a small part of the commitments to be demanded within one month and guarantees to be closed at maturity date. (Refer also to note 33 Commitment and contingencies)

Reconciliation between contingent liabilities and commitments maturity table and note 33 Commitment and contingencies is as follows:

	31 December 2020	31 December 2019
Commitments	4,868,368	4,378,023
Un-drawn credit facilities	4,868,368	4,378,023
Guarantees	5,773,011	5,193,902
Letters of credit	1,316,966	948,692
Guarantees in favor of customers	4,456,045	4,245,210

(c) Market Risk

Market risk is the risk that changes in market prices, such as interest rate, equity prices, foreign exchange rates and credit spreads (not relating to changes in the obligor's / issuer's credit standing) will affect the Bank's income or the value of its holdings of financial instruments. The objective of market risk management is to manage and control market risk exposures within acceptable parameters, while optimizing the return on risk.

Management of market risks

The Bank holds its securities portfolio in accordance with IFRS 9 as either Held to Collect (HTC) or Held to collect and sell (HTCS). ISBA Security Portfolio is managed by "ISBA Financial Portfolio Policy "which defines the below specific limits:

- According to changes in the ISBA Financial Portfolio Policy, approved in ISBA Board of Directors on 21st April 2020, the bank is not allowed to invest in the Hold to Collect Portfolio.
- According to the provision of the Capital Adequacy Ratio as of 01/01/2021, the assigned risk for the securities issued by the Albanian Government in foreign currency will be increased from 50% to 100%.
- The security portfolio should obey the specific limits related to type of issuer limits presented on the below table
- The overall portfolio must comply with some pre-defined type of issuer limits, which are categorized based on the issuer type, rating and currency.
- Investments in Portuguese and Greek government securities and covered bonds of the same countries are not allowed.

For all the investments in debt securities, classified as HTCS or HTC, issued by countries considered "at risk" according to ISP Country Risk Guidelines (i.e. countries not belonging to euro area with an internal rating lower than AA-), the approval process and authorization procedure required by the guidelines in force must be followed.

7. Financial Risk Management (continued)

(c) Market Risk (continued)

	nal amounts, Euro mln Equivalent)		T-4-1 11		Cinala I	
	Type of Issuer	Tot. Max Limit on the Overall Financial Portfolio	Total Maximo Business (Nominal	s Model l Value)	Single Issuer Maximum Limit on the Overall Financial Portfolio (Nominal Value)	
		(Nominal Value)	НТС	HTCS		
i)	Government T-Bills and T-Bonds issued by Albania Government and denominated in local currency.	None	No new purchases	None	None	
ii)	Government securities issued by Albania Government denominated in foreign currency.	The lower between Regulatory Limit ¹ and EUR 42 mln	No new purchases	The lower between Regulatory Limit ¹ and EUR 42 mln	The lower between Regulatory Limit ¹ and EUR 42 mln	
iii)	-Foreign Government securities issued by G7 countries (exempt-Japan),					
	-Securities issued by Government Agencies or Government Development Banks, with rating Aaa/AAA,		No new	None		
	-Securities issued by Supranational with rating Aaa/AAA,	None	purchases		100	
	denominated in currencies of the G7 members (exempt-JPY) - where the credit approval procedure is fulfilled for non-Government securities.	e the ulfilled				
iv)	Foreign Government securities - issued by EU countries not included in point iii) and rated at least A3/A-, denominated in currencies of G7 members (exempt-JPY).	50	0	50	15	
v)	Covered Bonds: - issued by Financial Institutions provided that the covered bond is rated at least Aa3/AA-, - issued by Financial Institutions of the parent company's country with issuer's rating not below the country's rating, denominated in currencies of the G7 members (exempt-JPY), where the credit approval procedure is fulfilled.	60	0	60	10 ²	

7. Financial Risk Management (continued)

(c) Market Risk (continued)

(i) Exposure to Foreign Exchange rate risk

Foreign exchange rate risk is defined as the possibility that foreign exchange rate fluctuations will produce significant changes, both positive and negative, in the Bank's statement of financial position. The key sources of exchange rate risk consist of:

- Foreign currency loans and deposits held by corporate and retail customers;
- Investment securities in foreign currencies;
- Trading of foreign banknotes;
- Collection and/or payment of interest, commissions, administrative costs, etc. in foreign currencies.

The Bank's exposure to exchange rate risk is monitored on a daily basis by Market and Operational Risk Office ensuring compliance with the internal and regulatory limits. Internal regulations set limits for each open currency position, global open position, maximum loss and Value at Risk (VaR).

During 2020 there have been breaches of the Stop Loss limit and the Var Limit, due to first reaction in the market created from the pandemic COVID 19 situation (of a sudden and sharp appreciation of EUR against LEK in the last days, change from 125.40 to 131.06 on 30 March 2020).

Therefore, VAR limits were reviewed and increased from 4.5 mln to 7 mln LEK and the stop loss limit from 3 mln to 3.5 mln LEK - approved on BoD of 30th June 2020.

A detailed analysis was carried out on a one-year historical data in order to confirm/establish the aforementioned limits. The local regulatory limits refer to a maximum of 20% of the regulatory capital for each open currency position and 30% for the overall open currency position.

The Bank has been within the limits in accordance with Bank of Albania regulation during the year 2020.

Financial assets denominated in foreign currencies are disclosed in each relevant note to the financial statements.

7. Financial Risk Management (continued)

(c) Market Risk (continued)

(i) Exposure to Foreign Exchange rate risk (continued)					
Assets	LEK	USD	EUR	OTHER	TOTAL
Cash and cash equivalents	2,963,586	4,613,545	21,845,880	2,994,339	32,417,350
Loans and advances to banks	4,125,170	1,418,991	21,192,258	153	26,736,572
Investment securities at FVOCI	30,491,018	504,341	5,695,128	-	36,690,487
Investment securities at amortized cost	31,516,092	1,933,978	1,633,147	-	35,083,217
Loans and advances to customers	17,378,638	2,657,818	30,866,271	110	50,902,837
Property and equipment's	1,915,582	-	-	-	1,915,582
Right of use	601,159	-	-	-	601,159
Intangible assets	489,831	-	-	-	489,831
Investment Property	533,798	-	-	-	533,798
Deferred tax assets	458,319	-	-	-	458,319
Current tax assets	379,233	-	-	-	379,233
Non-current assets held for sale	-	-	-	-	-
Other assets	457,910	22,151	1,938,256	6,771	2,425,088
Total Assets (1)	91,310,336	11,150,824	83,170,940	3,001,373	188,633,473
Liabilities					
Due to Banks	1,944,770	-	316,283	12,373	2,273,426
Due to customers	63,770,143	11,052,040	81,700,841	2,984,071	159,507,095
Provisions	457,977	31,096	346,232	-	835,305
Lease liabilities	4,741	-	598,245	-	602,986
Other liabilities	1,850,820	26,306	223,691	2,730	2,103,547
Deferred tax liabilities	259,345	-	-	-	259,345
Net Equity	22,991,983	(582)	60,368	-	23,051,769
Total Liabilities (2)	91,279,779	11,108,860	83,245,660	2,999,174	188,633,473
Net FX Position at 31 December 2020 (1)-(2)	30,557	41,964	(74,720)	2,199	
Off balance sheet Assets	16,088,144	3,471,474	130,015,985	123,155	149,698,758
Off balance sheet Liabilities	16,193,803	3,506,857	129,998,098	-	149,698,758
Net Off BSH FX Position at 31 December 2020	(105,659)	(35,383)	17,887	123,155	-
Total Net FX Position at 31 December 2020	(75,102)	6,581	(56,833)	125,354	-
Balance sheet Assets as at 31 December 2019	84,330,546	10,029,357	80,847,497	2,364,877	177,572,277
Balance sheet Liabilities as at 31 December 2019	83,493,058	9,921,700	81,807,475	2,350,044	177,572,277
Net Off BSH FX Position at 31 December 2019	(243,535)	(90,119)	333,654	-	-
Total Net FX Position at 31 December 2019	593,953	17,538	(626,324)	14,833	-

7. Financial Risk Management (continued)

(c) Market Risk (continued)

(ii) Exposure to Interest Rate risk

The principal Interest Rate risk to which the Bank's portfolios are exposed is the risk of loss from fluctuations in the future cash flows or fair values of financial instruments because of the change in market interest rates. This risk arises primarily from securities portfolio, retail and corporate banking. Interest rate risk is managed principally through periodic monitoring of interest rate spreads between the Bank's assets and liabilities and also preparing related scenario analysis on interest rates for decision making purposes.

The method used to measure Interest Rate risk of the Bank's assets and liabilities is based on the sensitivity analysis. The measurement system adopted by the Bank must ensure that the risk profile can be examined from two distinctive but complementary points of view:

- the economic value perspective (EVE Economic Value of Equity), that evaluates the impact of interest rates shocks (and their volatilities) on the present value of future cash flows;
- the net interest income perspective (NII Net Interest Income), that evaluates the impact of interest rates shocks (and their volatilities) on net interest income.

The Bank's financial assets and liabilities have mainly variable interest rate or have a re-pricing date of less than one year, except for Albanian Securities and for certain non-Albanian securities investment, which have coupon rates between 0.3 - 6.9% for USD denominated securities (2019: 2 - 6.9%) and between 0.3 - 3.6% for EUR denominated securities (2019: 0.3 - 5.8%)

The Bank's Regulation on Interest Rate Risk Management, "ISBA Guidelines on the governance of IRRBB" and "ISBA Rules on the measurement and control of IRRBB" have been approved by the ISBA Board of Directors on July 28^{th} , 2020.

These documents implement the latest regulatory provisions, recently defined in the Guidelines issued by the Parent Company on January 2019, based on the EBA regulation (EBA/GL/2018/02), and keeping the provisions of the Bank of Albania guideline "On managing interest rate risk in the banking book", approved as per decision No. 33, dated 30 April 2013. Interest rate risk generated by the Bank's assets and liabilities, as measured through shift sensitivity of Fair Value analysis of \pm 100 basis points, registered at the end of December 2020 a value of ALL -732 million (for +100 basis points) compared to the end of year 2019 ALL -619 million.

7. Financial Risk Management (continued)

(c) Market Risk (continued)

(ii) Exposure to Interest Rate risk (continued)

The table below shows the currency breakdown of the shift sensitivity for the year end 2020 and 2019.

	Shift sensitivity Increase in basis 31-Dec-20 points		Total	Sensitivity of Profit & Loss	Sensitivity of Equity
	EUR	+100 b.p. / -100 b.p.	(341,674)/152,055	(293,238)/134,943	(48,036)/17,112
	USD	+100 b.p. / -100 b.p.	(82,404)/90,163	(80,201)/87,930	(2,203)/2,234
	ALL	+100 b.p. / -100 b.p.	(309,602)/311,968	(25,205)/54,590	(284,397)/257,378
(Other (GBP & CHF)	+100 b.p. / -100 b.p.	891/(959)	891/(959)	0/0

Shift sensitivity	Increase in basis	Total	Sensitivity of	Sensitivity of	
31-Dec-19	points		Profit & Loss	Equity	
EUR	+100 b.p. / -100 b.p.	(214,693)/(143,471)	(206,040)/138,733	(8,654)/4,738	
USD	+100 b.p. / -100 b.p.	(99,150)/(108,806)	(96,935)/106,652	(2,215)/2,155	
ALL	+100 b.p. / -100 b.p.	(307,181)/307,609	(290,312)/291,657	(16,869)/15,952	
Other (GBP & CHF)	+100 b.p. / -100 b.p.	1,763/(1,804)	1,763/(1,804)	0/0	

The limits on shift sensitivity of Fair Value (EVE) for shock +100bp and the NII Sensitivity for shocks +/-50bp are part of the RAF limits for ISBA 2020.

The NII sensitivity records the NII effects generated by the market rates movement on the renewal/repricing of the banking book. It quantifies the short-term impact on the net interest income of a parallel, instantaneous, permanent shock of ± 50 basis points to the interest rate curve. This measure highlights the effect of variations in market rates on the interest margin generated by the portfolio that is being measured, excluding potential effects deriving from the new operations and future changes in the mix of assets and liabilities. The reference time horizon is typically limited to 1 year and according to the hypothesis that the institution is able to continue its activities ("going concern" approach).

The Interest rate risk generated by the Bank's assets and liabilities, as measured through shift sensitivity of Net Interest Income analysis of \pm 50 basis points, registered at 31 December 2020 a value of Lek 270 million (for +50 basis points) and a value of Lek -304 million (for -50 basis points), compared to December 2019 Lek 258 million (for +50 basis points) and a value of Lek -260 million (for -50 basis points).

The sight positions with customers in ALL and EUR are treated based on behavioral model for the NII sensitivity defining the customer interest rate in the long-term and including the behavioral features and delayed reaction to market interest rates (in the short-term) resulting from the model. The behavioral model is developed by ISP Financial and Market Risks Head Office Department, based on the ISBA historical data provided from the Local Risk structure.

A different method used to measure Interest Rate risk is required by the Bank of Albania, which consists of quarterly monitoring of the interest rate risk exposure towards a parallel shock of ± 200 basis points of the interest rate curve. For all the financial categories of assets and liabilities divided into either fixed or floating rate, their present value is calculated and is distributed in 14-time buckets. The total present value is then multiplied accordingly with the estimated modified duration of each time bucket. The limit for this exposure is 20% of the Bank's regulatory capital. The Bank has been within the limit with the interest rate risk exposures at 31 December 2020 being 10.0% of the Bank's regulatory capital (31 December 2019: 7.9%).

The Bank has been within the limits in accordance with Bank of Albania regulation and the internal regulation during the year 2020.

7. Financial Risk Management (continued)

(c) Market Risk (continued)

(ii) Exposure to Interest Rate risk (continued)

The tables below summarize the Bank's interest-bearing financial assets and liabilities with both fixed and floating interest rates, as reported to Parent company and management of the Bank. The information is not reconcilable as it is provided by management and adjusted as per below.

Based on the management of Interest Rate risk regulation, each financial instrument is mapped to the repricing gap based on contractual undiscounted cash - flows or behavioral re-pricing date. The contractual includes instruments where the Bank knows exactly when the maturity or next re - pricing takes place.

31 December 2020		O/N	0-3 months	3-18 months	18m - 3 years	3 - 5 years	>5 years	Total
Assets	Interest rate type							
Loans and advances to banks	Fix rate Floating rate	17,314,251 -	33,088,722	7,237,197 -	-	-	-	57,640,170 -
Loans and advances to customers	Fix rate Floating rate	11,491,088 1,237,287	947,276 4,234,608	5,060,632 24,137,760	2,476,423 360,812	1,304,973 318,346	1,412,930 495,151	22,693,322 30,783,964
Financial investments HTM and AFS	Fix rate Floating rate		11,343,991 3,552,167	37,711,095 513,347	11,335,030 11,649	8,483,676 692	2,142,990	71,016,782 4,077,855
Non-Performing Loans Other financial assets	Fix rate Fix rate	(117,858) 1,503,763	323,448	560,263	32,006	62,178 -	154,576 -	1,014,613 1,503,763
Total financial assets (interest-be Liabilities	aring)	31,428,531	53,490,212	75,220,294	14,215,920	10,169,865	4,205,647	188,730,469
Deposits to banks	Fix rate Floating rate	(596,923)	(1,362,000)	-	-	(317,333)	-	(2,276,256)
Due to customers	Fix rate Floating rate	(107,332,135)	(11,622,982)	(25,860,053)	(10,548,007)	(5,539,387)	(188,288)	(161,090,852)
Other liabilities	Fix rate Floating rate	(490,149) -	(36,473)	(283,989)	(128,761) -	(90,347)	(39,456)	(1,069,175) -
Total financial liabilities (interest-bearing)		(108,419,207)	(13,021,455)	(26,144,042)	(10,676,768)	(5,947,067)	(227,744)	(164,436,283)
Interest sensitivity gap		(76,990,676)	40,468,757	49,076,252	3,539,152	4,222,798	3,977,903	24,294,186

The behavioral includes instruments not amenable, whose residual life and/or interest rate have high levels of uncertainty that may depend on specific behaviors by customers, as the sight loans (advances to banks and advances to customers) and sight deposits (current accounts to customers) are positioned in the O/N (on demand) bucket, until the definition of behavioral coefficients. The reprising gap is calculated according to the internal rules on Interest rate risk as the difference between interest-bearing assets and interest-bearing liabilities in a given time bucket. Other financial assets/liabilities, capital and reserves, are items not included in the reprising gap, not considered interest-bearing.

7. Financial Risk Management (continued)

- (c) Market Risk (continued)
- (ii) Exposure to Interest Rate risk (continued)

31 December 2019		O/N	0-3 months	3-18 months	18m - 3 years	3 - 5 years	>5 years	Total
Assets	Interest rate type				-			
Loans and advances to banks	Fix rate Floating rate	15,477,295 -	32,865,605	9,624,816 -	-	-	-	57,967,716 -
Loans and advances to customers	Fix rate Floating rate	12,360,484 74,407	773,965 5,694,239	4,727,470 20,070,008	2,588,225 625,210	1,285,437 488,603	1,097,731 567,739	22,833,312 27,520,206
Financial investments HTM and AFS	Fix rate Floating rate	146,340	6,667,894 2,609,430	31,562,700 3,046,786	13,920,677 30,826	8,644,785 24,517	5,056,626	65,999,022 5,711,559
Other financial assets	Fix rate Floating rate	-	-	-	-	- -	-	-
Total financial assets (interest-be Liabilities	earing)	28,058,526	48,611,133	69,031,780	17,164,938	10,443,342	6,722,096	180,031,815
Deposits to banks	Fix rate Floating rate	(193,861)	(1,690,188)	(71,417) -	-	(312,444)	-	(2,267,910)
Due to customers	Fix rate Floating rate	(93,764,582)	(13,578,466)	(28,441,551)	(6,073,294)	(10,927,298)	(200,977)	(152,986,168)
Other liabilities	Fix rate Floating rate	-	-	-	-	-	-	-
Total financial liabilities (interes	t-bearing)	(93,958,443)	(15,268,654)	(28,512,968)	(6,073,294)	(11,239,742)	(200,977)	(155,254,078)
Interest sensitivity gap		(65,899,917)	33,342,479	40,518,812	11,091,644	(796,400)	6,521,119	24,777,737

7. Financial Risk Management (continued)

(d) Operational Risk

Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people, systems or external events. This definition includes: legal risk, or the risk of losses resulting from violations of law or regulations, from contractual or constructive liability or from other disputes; model risk, defined as the potential loss which can be suffered by an entity, resulting from decisions mainly based on the results of internal models, caused by errors occurred during their development, implementation or use; Compliance risk, defined as the risk to incur judicial or administrative penalties, relevant financial losses resulting from the violation of mandatory rules or self-regulation; ICT risk (Information and Communication Technology, or simply computer risk), defined as the risk to incur economic losses related to the use of information and communication technology. Strategic and reputational risks are excluded.

The Bank's Board of Directors has approved the guidelines on the overall operational risk management framework adopting a policy and an organizational process for measuring, managing and controlling operational risk. The Bank's Regulation on Guideline for Operational Risk Management is fully in compliance with the Group Guidelines on Operational Risk Management issued on December 2014.

The Bank's Operational Risk Management Committee (hereinafter as ORCO) is responsible for the management of the operational risk of the Bank in terms of reviewing operational risk governance documentation and approving changes, preparing policies, standards and methodologies regarding operational risk management. One of the tools introduced for the management of operational risk is the definition of Operational Risk Key Indicators (KRIs). The final list of KRIs and thresholds was approved in ISBA Operational Risk Committee on October 2015. Since their approval, the Internal KRIs have been monitored and reported on quarterly bases in the ORCO and BoD meetings. The Internal KRIs are subject of an annual review process in order to ensure that they are aligned with the dynamic of the operational context and the significant risks that the Bank faces. Any amendment on KRIs policy will be submitted in ORCO and BoD for approval.

Thresholds for Bank of Albania KRI-s are defined and integrated within "ISBA KRIs Policy", approved in ISBA BOD 4 May 2018. The KRI-s are monitored on quarterly basis as per regulation BoA "On Operational Risk Management" in place, and reported in ORCO and BoD meetings.

The Bank's Risk Management Division is responsible for the identification, assessment, management and mitigation of operational risks, the verification of mitigation effectiveness and reporting to the Bank Senior Management and Group Risk Management with the aim of assessing the potential economic impact of particularly serious operational events.

The Bank carries out an annual assessment campaign set up by Intesa Sanpaolo Group, Self-Diagnosis process, which consists on the operational risk identification and assessment linked to the activity of each single unit within a structure.

The objectives of the Self Diagnosis process are to identify, measure, monitor, and mitigate operational risks. The Self Diagnosis process contributes to the spread of risk - control culture within the Bank. This process is composed of phases relative to the Assessment of the Business Environment, which determines the quality of each structure's risk control profile through the analysis of the importance and the level of management of risk factors in the operating context and phases relative to Scenario Analysis, which determine the size of each structure's risk profile by collecting estimated quantitative data from Business and Operational Units Responsible.

The Bank has the same responsibilities towards the Bank of Albania, based on the regulation on management of operational risk, entered into force on January 2011. The Bank reports regularly on the key indicators and classifications of effective operational losses as per business lines according to the regulatory requirements.

7. Financial Risk Management (continued)

(e) Capital Management

The Bank's lead regulator, the Central Bank of Albania, sets and monitors capital requirements for the Bank. The Bank's policy is to maintain the capital base within limits, capitalizing all activity earnings so as to sustain future development of the business recognizing the impact of the level of capital on shareholders' return. The Bank recognizes the need to maintain a balance between the higher returns that might be possible with greater gearing and the advantages and security afforded by a sound capital position.

Implementing the current capital requirements, the Central Bank of Albania requires the Bank to maintain a prescribed ratio of total capital to total risk-weighted assets and off-balance sheet items, at a minimum level of 12%. During financial year 2020 the Bank achieved an adequacy ratio well above the minimum required which as at 31 December 2020 is calculated 21.54% (2019: 22.69%).

The modified capital adequacy ratio, which represents the ratio of base capital to risk-weighted assets and off-balance sheet items, is another limit set by the Central Bank of Albania at a level of 6%. Throughout the period, there were no material changes in the Bank's management of capital and all externally imposed capital requirements were complied with.

Regulation on Capital Adequacy Ratio entered into force in March 2015 and is based on Basel II criteria and in line with the European Directives for Financial Institutions.

	Note	31 December 2020	31 December 2019
Tier 1 capital - CET1			
Share capital	20	5,562,518	5,562,518
Share premium	20	1,383,880	1,383,880
Legal and regulatory reserves	21	1,825,623	1,825,623
Regulatory retained earnings		10,368,316	10,368,316
5 ,		19,140,337	19,140,337
Deductions:			
Regulatory intangible assets		(607,690)	(695,485)
Total qualifying Tier 1 capital		18,532,647	18,444,852
Risk-weighted assets:			
On and off-balance sheet		77,289,895	72,237,191
Risk assets for operational risk		8,762,143	9,038,279
Total risk-weighted assets		86,052,038	81,275,470
Tier I capital to risk- weighted asset ratio		21.54%	22.69%

As at 31 December 2017, the Bank of Albania the guideline "On the internal capital adequacy assessment process" entered in force which set out the requirements for banks on drafting and implementing the Internal Capital Adequacy Assessment Process (ICAAP), as well as the expectations of the supervisor on the structure and content of the regulatory report of this process. ICAAP, which is independently realized by the bank and approved from its governing bodies by acknowledging also regulatory requirements, shall ensure the assessment of the current and future levels of capital adequacy, based on its risk profile and strategies. ICAAP has been prepared by the Bank starting from year 2013 following also the ISP Group requirement and also have been timely submitted to the regulator during May 2020.

8. Financial Assets and Financial Liabilities

(a) Fair values of financial assets and financial liabilities

, ,				Carrying Amou	ınt		Fair Value				
31 December 2020	Note	Investment securities at amortized cost	Investment securities at FVOCI	Loans and advances to banks	Other financial liabilities	Total carrying amount	Level 1	Level 2	Level 3	Total	
Loans and advances to banks	11	-	-	50,902,837	-	50,902,837	-	-	50,902,837	50,902,837	
Investments securities at amortized cost	12	35,083,217	-	-	-	35,083,217	3,567,125	32,112,2 78	-	35,083,217	
Investment securities at FVOCI	12	-	36,690,487	-	-	36,690,487	3,848,556	-	-	36,690,487	
Total		35,083,217	36,690,487	50,902,837	-	122,676,541	7,415,681	32,112,2 78	50,902,837	122,676,541	
Deposits from customers	21	-	-	-	159,507,095	159,507,095	-	-	160,237,369	160,237,369	
Total		-	-	-	159,507,095	159,507,095	-	-	160,237,369	160,237,369	
31 December 2019	Note	Investment securities at amortized cost	Investment securities at FVOCI	Loans and advances to banks	Other financial liabilities	Total carrying amount	Level 1	Level 2	Level 3	Total	
Loans and advances to banks	11	-	-	29,146,303	-	29,146,303	-	-	29,146,303	29,146,303	
Investments securities at amortized cost	12	62,630,361	-	-	-	62,630,361	4,925,469	-	60,483,346	65,408,815	
Investment securities at FVOCI	12	-	4,289,282	-	-	4,289,282	3,563,294	-	725,988	4,289,282	
Total		62,630,361	4,289,282	29,146,303	-	96,065,946	8,488,763	-	90,355,637	98,844,400	
Deposits from customers	21	-	-	-	150,941,625	150,941,625	-	-	151,780,649	151,780,649	
Total		-	-	-	150,941,625	150,941,625	-	-	151,780,649	151,780,649	

HTC Albanian Government securities are fixed and floating rate bonds. The floating rate bond is given as the average yield of the last three Treasury bill auctions with the maturity of one year plus the spread. The measurement of the fair value for these securities is performed using the mark-to-market model valuation technique, by discounting all future cash flows deriving from such instruments. The rest of the HTC foreign securities denominated in foreign currencies represent Banks and Financial Institutions' securities whose fair value is measured according the "ISBA fair value internal rules". Loans and advances to customers have carrying amount, which is considered also their fair value, as the major part of portfolio is based on floating interest rates. The fair value of Time Deposits from customers is re-priced using the net present value. The interest rates applied are the market interest rates published from Bank of Albania. These rates are an estimate of the market rates. The fair value of current accounts, savings accounts is considered to approximate their carrying amount, given they have short-term maturity.

8. Financial Assets and Liabilities (continued)

(b) Classification of financial assets and financial liabilities

See accounting policies in Notes 6 (g)(ii).

The following table provides a reconciliation between line items in the statement of financial position and categories of financial instruments.

	Note	Amortized cost	FVOCI	Total carrying amount
31 December 2020	_			
Financial Assets				
Cash and cash equivalents	11	32,417,350	-	32,417,350
Loans and advances to banks	12	26,736,572	-	26,736,572
Investments securities	13	35,083,217	36,690,487	71,773,704
Loans and advances to customers	14	50,902,837	-	50,902,837
Total	_	145,139,976	36,690,487	181,830,463
Financial Liabilities	_			
Due to banks	20	2,273,426	-	2,273,426
Due to customers	21	159,507,095	-	159,507,095
Total	_	161,780,521	-	161,780,521
	Note	Amortized	FVOCI	Total carrying
	HOLE	cost	1 4001	
				amount
31 December 2019	_			amount
31 December 2019 Financial Assets	-			amount
- · · · · · · · · · · · · · · · · · · ·	11	30,240,115	-	30,240,115
Financial Assets	11 12		- -	
Financial Assets Cash and cash equivalents		30,240,115	- - 4,289,282	30,240,115
Financial Assets Cash and cash equivalents Loans and advances to banks	12	30,240,115 29,146,303	- - 4,289,282 -	30,240,115 29,146,303
Financial Assets Cash and cash equivalents Loans and advances to banks Investments securities	12 13	30,240,115 29,146,303 62,630,361	4,289,282 - 4,289,282	30,240,115 29,146,303 66,919,643
Financial Assets Cash and cash equivalents Loans and advances to banks Investments securities Loans and advances to customers	12 13	30,240,115 29,146,303 62,630,361 44,864,090	<u> </u>	30,240,115 29,146,303 66,919,643 44,864,090
Financial Assets Cash and cash equivalents Loans and advances to banks Investments securities Loans and advances to customers Total	12 13	30,240,115 29,146,303 62,630,361 44,864,090	<u> </u>	30,240,115 29,146,303 66,919,643 44,864,090
Financial Assets Cash and cash equivalents Loans and advances to banks Investments securities Loans and advances to customers Total Financial Liabilities	12 13 14 -	30,240,115 29,146,303 62,630,361 44,864,090 166,880,869	<u> </u>	30,240,115 29,146,303 66,919,643 44,864,090 171,170,151

9. Cash and cash equivalents

Cash and cash equivalents as at 31 December 2020 and 31 December 2019 are detailed as follows:

	31 December 2020	31 December 2019
Cash on hand	1,503,639	1,443,488
Current accounts with banks	14,472,573	15,454,727
Unrestricted balances with Bank of Albania	873,574	7,602
Money market placements	15,569,556	13,334,849
Less impairment loss allowance	(1,992)	(551)
Total	32,417,350	30,240,115

10. Loans and advances to banks

Loans and advances to banks as at 31 December 2020 and 31 December 2019 are composed as follows:

	31 December 2020	31 December 2019
Compulsory reserve with Bank of Albania	16,199,346	15,450,973
Deposits with correspondent banks	10,542,703	13,699,125
Less impairment loss allowance	(5,477)	(3,795)
Total	26,736,572	29,146,303

In accordance with the Bank of Albania requirements, the Bank at the reporting date should maintain a minimum of compulsory reserve as per percentages determined by the regulator (See note 7.(b).(ii)).

Such reserves are maintained in original currency for due to customer balances denominated in local currency. For due to customer balances denominated in foreign currency the Bank is obliged to maintain in original currency.

The amount required to be deposited is calculated monthly in arrears. According to the Bank of Albania regulation 70% of this reserve in Lek is available for daily use by the Bank.

The remuneration interest rate of obligatory reserve denominated in Lek is 70% of repurchase agreements rate equal to 1.00% for 31 December 2020 (31 December 2019: 1.00%).

The remuneration interest rate of the obligatory reserve in EUR is equal to the European Central Bank base rate equal to minus 0.50% for EUR for 31 December 2020 (31 December 2019: minus 0.50%).

Deposits with banks comprise money market placements with an original maturity of over three months.

11. Investment securities

_	31 December 2020	31 December 2019
Investment securities measured at FVOCI-debt instruments	36,690,487	4,289,282
Investment securities measured at amortized cost- debt instruments	35,083,217	62,630,361
Total	71,773,704	66,919,643

Investment securities measured at FVOCI as at 31 December 2020 and 31 December 2019 can be detailed as follows:

	31 December 2020	31 December 2019
Corporate issuers		
Bank issuers	-	-
Unlisted	-	-
Listed	-	-
Sovereign issuers		
Republic of Albania	33,108,729	725,988
Unlisted	33,108,729	725,988
Listed	-	-
EU member states	2,885,166	2,822,864
Listed	2,885,166	2,822,864
Other Financial Institutions	696,592	740,430
Listed	696,592	740,430
Total	36,690,487	4,289,282

Investment securities measured at amortized cost as at 31 December 2020 and 31 December 2019 can be detailed as follows:

	31 December 2020	31 December 2019
Sovereign issuers		
Republic of Albania	33,149,239	58,051,455
Unlisted	31,516,092	58,051,455
Listed	1,633,147	-
US and EU member states	1,933,978	4,578,906
Listed	1,933,978	4,578,906
Total	35,083,217	62,630,361

As at 31 December 2020 and 31 December 2019 no Albanian Government securities have been pledged as collateral for repurchase agreements (see note19).

12. Loans and advances to customers

Loans and advances to customers measured at amortized cost are composed as follows:

	31 December 2020	31 December 2019
Loans	41,424,672	34,780,008
Overdrafts	11,628,570	12,241,665
Deferred disbursement fees	(154,641)	(143,270)
Gross amount	52,898,601	46,878,403
Less impairment loss allowance (see Note 7.(a).(v))	(1,995,764)	(2,014,313)
Total net amount	50,902,837	44,864,090

	2020		2019			
	Gross			Gross		
	carrying	ECL	Carrying	carrying	Impairment	Carrying
	amount	allowance	amount	amount	allowance	amount
Retail customers	24,422,811	963,457	23,459,354	23,525,741	1,103,207	22,422,534
Mortgage lending	10,442,822	257,882	10,184,941	8,893,106	371,877	8,521,229
Personal loans	13,928,539	699,840	13,228,700	14,549,288	715,401	13,833,887
Credit cards	30,181	4,475	25,706	73,058	14,740	58,318
Leasing	21,268	1,261	20,008	10,289	1,189	9,100
Corporate customers	28,475,790	1,032,307	27,443,483	23,352,662	911,106	22,441,556
Investment loans	23,218,348	823,176	22,395,172	21,650,397	750,001	20,900,396
Working capital	4,775,776	206,354	4,569,422	1,625,668	160,488	1,465,180
Leasing	481,666	2,778	478,889	76,597	617	75,980
Total	52,898,601	1,995,766	50,902,837	46,878,403	2,014,313	44,864,090

13. Non-current assets held for sale

The Bank holds under non-current assets held for sale, loans issued from VBA identified during Board of Experts due diligence as non-performing loans to be transferred back to Veneto Banca in compulsory administrative liquidation and high risk loans already classified as non performing (unlikely to pay or doubtful) which shall be transferred to the Veneto Banca in compulsory administrative liquidation, with customized guarantee from the Government of Italy, during the next retrocession windows envisaged by contract. The related loans carrying amount was determined based on the contractual indications, which set out a consideration equal to their gross value net of impairment allowance recognized only 50% of the value of those ISP Group would have had to account by complying with its own loan loss impairment policies with the price that will be payable to retransfer the corresponding exposure to the Veneto Banca in compulsory administrative liquidation.

14. Property and Equipment

Property and Equipment as at 31 December 2020 and 31 December 2019 is as follows:

	Land and Building	IT and Electrical Equipment	Furniture and Fine Art Works	Other non- Electrical Assets	Assets acquired not put into use	Total
Cost						
Balance as at 1 January 2019	1,724,985	1,470,556	301,852	313,245	221,256	4,031,894
Additions	55,910	57,781	9,583	13,613	47,070	183,957
Disposals	-	(403,026)	(152,626)	(87,946)	-	(643,598)
Balance as at 31 December 2019	1,780,895	1,125,311	158,809	238,912	268,326	3,572,253
Additions	1,890	118,989	8,713	16,968	7,199	153,759
Disposals	-	-	-	-	-	-
Adjustment of Revaluation	(284,426)	-	-	-	-	(284,426)
Balance as at 31 December 2020	1,498,359	1,244,300	167,522	255,880	275,525	3,441,586
Accumulated Depreciation						_
Balance as at 1 January 2019	57,270	1,250,835	255,405	277,889	-	1,841,399
Depreciation for the year	59,596	77,044	11,916	12,002	-	160,558
Disposals	-	(400,187)	(151,824)	(86,776)	-	(638,787)
Used on the Impairment loss	-	(2,590)	-	-	-	(2,590)
Balance as at 31 December 2019	116,866	925,102	115,497	203,115	-	1,360,580
Depreciation for the year	61,422	88,398	12,565	3,650	-	166,035
Disposals	-	-	-	-	-	-
Used on the Impairment loss	-	-	-	(611)	-	(611)
Balance as at 31 December 2020	178,288	1,013,500	128,062	206,154	-	1,526,004
Carrying amount						
At 1 January 2019	1,667,715	219,721	46,447	35,356	221,256	2,190,495
At 31 December 2019	1,664,029	200,209	43,312	35,797	268,326	2,211,673
At 31 December 2020	1,320,071	230,800	39,460	49,726	275,525	1,915,582

15. Leases

A. Leases as lessee (IFRS 16)

The Bank leases a number of branch and office premises. This leases typically run for a period of 10 years, with an option to renew the lease after that date. For some leases, payments are renegotiated every five years to reflect market rentals. Some lease provides for additional rent payments that are based on changes in local price indices.

The Bank also leases IT equipment with contract terms of one to three years. These leases are short-term and/or leases of low-value items. The Bank has elected not to recognize right-of-use assets and lease liabilities for these leases. Previously, these leases were classified as operating leases under IAS 17. There are no leases where the Bank is a lessor whereas information about leases for which the Group is a lessee is presented below:

i. Right-of use assets

Right-of-use assets relate to leased branch and office premise are presented below:

	2020	2019
Balance at 1 January	460,883	337,298
Depreciation charge for the year	(80,152)	(137,555)
Additions	220,428	261,140
Balance at 31 December	601,159	460,883

At 31 December 2020 and 2019, the future minimum lease payments under non-cancellable operating leases were payable as follows.

Maturity analysis-Contractual undiscounted cash	2020	
flows		2019
Less than one year	44,312	45,274
Between one and five years	-	-
More than five years	-	-
Total undiscounted lease liabilities at 31 December	44,312	45,274
ii. Amounts recognized in profit or loss		
	2020	2019
Interest on lease liabilities	8,716	7,262
Expenses relating to short term leases	3,109	32,705
Expense relating to leases of low-value assets, excluding short-term leases of low-value assets	892	809

The Bank has rental agreements with renewal options for its offices in Albania. During 2020, the amount of Lek 21,963 thousand was recognized as operating lease expense under IAS 17 in respect of lease rentals (2019: 55,797).

Amounts recognized in statement of cash flows		
	2020	2019
Total cash outflow for leases	156,798	140,489

iii. Extension options

Some leases of office premises contain extension options exercisable by the Bank up to one year before the end of the non-cancellable contract period. Where applicable, the Bank seeks to include extension options in new leases to provide operational flexibility. The extension options held are exercisable only by the Bank and not by the lessors. The Bank assesses at lease commencement date whether it is reasonably certain to exercise the extension options. The Bank reassesses whether it reasonably certain to exercise the options if there is a significant event or significant changes in circumstances within its control.

16. Intangible Assets

Intangible assets as at 31 December 2020 and 31 December 2019 are as follows:

	Software and Licenses	Advances for Software	Total
Cost			_
Balance as at 1 January 2019	1,899,924	75,806	1,975,730
Additions during period	178,246	93,814	272,060
Transfers	(28,920)	-	(28,920)
Balance as at 31 December 2019	2,049,250	169,620	2,218,870
Additions during period	131,120	-	131,120
Transfers	-	(49,593)	(49,593)
Balance as at 31 December 2020	2,180,370	120,027	2,300,397
Amortization and Impairment Losses			
Balance as at 1 January 2019	1,481,394	-	1,481,394
Amortization charge for the year	164,020	-	164,020
Disposals	(27,521)	-	(27,521)
Balance as at 31 December 2019	1,617,893	-	1,617,893
Amortization charge for the year	192,672	-	192,672
Disposals	-	-	-
Balance as at31 December 2020	1,810,565	-	1,810,565
Carrying amount			<u> </u>
At 1 January 2019	418,530	75,806	494,336
At 31 December 2019	431,357	169,620	600,977
At 31 December 2020	369,804	120,027	489,831
		•	

17. Investment property

The Bank holds investment property as consequence of acquisitions through enforcement of security over loans and advances. As at 31 December 2020, the investment property represents a foreclosed collateral repossessed during 2017. During 2020, investment property rentals of Lek 4,179 thousand (2019: Lek 17,347 thousand) have been recognized in other income. Based on the agreement between parties the annual rent for the first year is calculated 2.8% of the historical cost. The annual rent change over the period based on the payment of instalment for purchase of the property.

Buildings	Total
721,488	721,488
-	-
721,488	721,488
-	-
721,488	721,488
175,932	175,932
-	-
-	-
175,932	175,932
11,758	11,758
187,690	187,690
545,556	545,556
533,798	533,798
	721,488

The fair value of investment property was determined by external, independent property valuers, having appropriate recognized professional qualifications and recent experience in the location and category of the property being valued. The independent valuers provide the fair value of the Bank's investment property portfolio every year and its fair value measurement is categorized as a Level 2 fair value based on the inputs to comparable approach used.

18. Inventory and other assets

Other assets as at 31 December 2020 and 31 December 2019 are as follows:

	31 December 2020	31 December 2019
Inventory	668,996	1,308,124
Sundry debtors	1,333,803	53,399
ATM & POS transactions	50,529	57,907
Leasehold improvements	92,913	114,999
Prepayments	41,780	43,462
Cheques for collection	14,637	4,949
Others	222,430	99,807
Total	2,425,088	1,682,647

Inventory represents repossessed assets acquired in the process of collection of defaulted loans. The movement of "repossessed assets" item during the reporting period is presented as follows:

	2020	2019
At beginning of the period	1,308,124	1,892,768
Additions during period	3,958	11,428
Disposals of the period	(627,212)	(819,162)
Write back/(down) to net realizable value	(33,326)	267,260
Effect of movements in foreign exchange	17,452	(44,170)
At end of the period	668,996	1,308,124

The movement of leasehold improvements during the reporting period is presented as follows:

	31 December 2020	31 December 2019
At beginning of the period	114,999	31,407
Additions during period	17,914	120,597
Write off	(614)	(22,813)
Amortization of the period	(15,891)	(14,192)
Transfer for Integration	(23,495)	-
At end of the period	92,913	114,999

19. Due to banks

Due to banks as at 31 December 2020 and 31 December 2019 are as follows:

	31 December 2020	31 December 2019
Correspondent banks		
Current accounts	335,190	414,299
Resident	7,705	6,841
Non-resident	327,485	407,458
Deposits	1,362,008	1,690,029
Resident	1,362,008	1,690,029
Non-resident	-	-
Current Accounts with Central Bank	576,228	145,715
Total	2,273,426	2,250,043

As at 31 December 2020 and 31 December 2019, no Albanian Government securities have been pledged as collateral for repurchase agreements (see note 12).

20. Due to customers

Due to customers as at 31 December 2020 and 31 December 2019 are composed as follows:

31 December 2020

31 December 2019

Current accounts	Local Currency	Foreign Currency	Total	Local Currency	Foreign Currency	Total
Retail	11,987,612	23,172,065	35,159,677	9,540,860	19,844,042	29,384,902
Corporate	13,629,866	28,624,327	42,254,193	10,412,605	25,935,406	36,348,011
	25,617,478	51,796,392	77,413,870	19,953,465	45,779,448	65,732,913
Deposits						
Retail	37,038,300	40,009,412	77,047,712	36,959,156	42,109,382	79,068,538
Corporate	1,114,365	3,931,148	5,045,513	1,799,717	4,340,457	6,140,174
	38,152,665	43,940,560	82,093,225	38,758,873	46,449,839	85,208,712
Total	63,770,143	95,736,952	159,507,095	58,712,338	92,229,287	150,941,625

Balances due to customers by maturity and currency type are as follows:

31 December 2020

31 December 2019

	Local Currency	Foreign Currency	Total	Local Currency	Foreign Currency	Total
Current Accounts	25,617,478	51,796,392	77,413,870	19,953,465	45,779,448	65,732,913
Deposits	•					
On demand	4,777,472	19,807,463	24,584,935	5,383,679	22,316,741	27,700,420
One month	2,490,773	2,347,266	4,838,039	2,490,773	2,347,266	4,838,039
Three months	3,028,586	6,000,625	9,029,211	3,028,586	6,000,625	9,029,211
Six months	3,761,328	4,216,905	7,978,233	3,761,328	4,216,905	7,978,233
Nine months	4,199,641	6,075,213	10,274,854	4,199,641	6,075,214	10,274,855
Twelve months	3,518,010	3,631,322	7,149,332	3,518,010	3,631,322	7,149,332
Twenty-four months	3,585,348	1,417,011	5,002,359	3,585,348	1,417,011	5,002,359
Other	12,791,507	444,755	13,236,262	12,791,508	444,755	13,236,263
	38,152,665	43,940,560	82,093,225	38,758,873	46,449,839	85,208,712
Total	63,770,143	95,736,952	159,507,095	58,712,338	92,229,287	150,941,625

20. Due to customers (continued)

For current accounts (for which is paid interest) and time deposits, the annual published interest rates applicable for the various fixed terms were:

2020	ALL (%)	USD (%)	EUR (%)
Current accounts and demand deposits	0.05 - 1.73	0.05 - 1.42	0.00 - 0.65
Time deposits - 1 month	0.20 - 0.20	0.05 - 0.10	0.00 - 0.002
Time deposits - 3 months	0.20 - 0.40	0.10 - 0.20	0.00 - 0.002
Time deposits - 6 months	0.20 - 0.50	0.10 - 0.25	0.00 - 0.005
Time deposits - 9 months	0.40 - 0.40	-	0.00 - 0.006
Time deposits - 12 months	0.20 - 0.90	0.10 - 0.30	0.00 - 0.01
Time deposits - 24 months	1.05 - 1.35	0.20 - 0.30	0.00 - 0.05
Time deposits - 36 months	1.40 - 1.60	0.25 - 0.25	0.00 - 0.10
Time deposits - 60 months	2.26 - 2.75	0.25 - 0.25	0.00 - 0.10
Time deposits - 84 months	3.09 - 3.25	-	-

2019	ALL (%)	USD (%)	EUR (%)
Current accounts and demand deposits	0.03-2.06	0.05-2.31	0.002 - 0.65
Time deposits - 1 month	0.20-0.20	0.05-0.10	0.002 - 0.002
Time deposits - 3 months	0.20 - 0.85	0.10 - 0.20	0.001 - 0.002
Time deposits - 6 months	0.20 - 1.05	0.10 -0.25	0.003 - 0.005
Time deposits - 9 months	0.40 - 0.40	-	0.006 - 0.006
Time deposits - 12 months	0.20-1.35	0.10-0.30	0.005 - 0.01
Time deposits - 24 months	1.10 - 2.00	0.20 - 0.30	0.02 -0.05
Time deposits - 36 months	1.50 - 2.60	0.25 - 0.25	0.05 - 0.10
Time deposits - 60 months			
Time deposits - 84 months			

All individual and cooperate customer deposits, in accordance with the Law No. 52, dated 25.05.2014 "On the Insurance of Deposits" amended, are protected without any cost for customers, up to the amount of Lek 2,500,000 (or in Lek equivalent if in foreign currency) with the Deposit Insurance Agency (DIA).

21. Deferred Tax

Recognized deferred tax assets and liabilities are attributable to the following:

_	31 December 2020		31 December 20		2019	
	Assets	Liabilities	Net	Assets	Liabilities	Net
Investment securities measured at						(6,112)
FVOCI	-	73,396	(73,396)	-	6,112	
Allowance for expected credit						115,821
losses	102,298	-	102,298	115,821	-	
Investment Property	-	1,599	(1,599)	-	1,599	(1,599)
Repossessed assets	173,816	-	173,816	256,457	-	256,457
Properties	-	94,177	(94,177)	-	136,841	(136,841)
Right-of-use assets	90,449	90,173	276	66,892	69,132	(2,240)
Equipment and intangible assets	91,756	-	91,756	92,517	-	92,517
Net deferred tax assets	458,319	259,345	198,974	531,687	213,684	318,003

21. Deferred Tax (continued)

Movements in temporary differences during the year are as follows:

31 December 2020	Opening balance	Recognized in profit or loss	Recognized in other comprehensive income	Closing Balance
Investment securities measured at FVOCI	(6,112) 115,821	-	(67,284) (13,523)	(73,396) 102,298
Allowance for expected credit losses Investment Property	(1,599)	-	-	(1,599)
Repossessed assets	256,457 (136,841)	(82,641)	- 42,664	173,816 (94,177)
Properties	(2,241)	- 2,515	,	274
Right-of-use assets Equipment and intangible assets	92,518	(760)	-	91,758
Total	318,003	(80,886)	(38,143)	198,974
31 December 2019	Opening balance	Recognized in profit or loss	Recognized in other comprehensive income	Closing Balance
Investment securities measured at FVOCI		Recognized in profit or	Recognized in other comprehensive	Closing
Investment securities measured at FVOCI Allowance for expected credit losses	balance 17,984	Recognized in profit or	Recognized in other comprehensive income	Closing Balance (6,112)
Investment securities measured at FVOCI	17,984 160,571 (1,599) 300,192	Recognized in profit or	Recognized in other comprehensive income (24,095) (44,750)	Closing Balance (6,112) 115,821 (1,599) 256,457
Investment securities measured at FVOCI Allowance for expected credit losses Investment Property Repossessed assets Properties	17,984 160,571 (1,599)	Recognized in profit or loss	Recognized in other comprehensive income (24,095) (44,750)	Closing Balance (6,112) 115,821 (1,599)
Investment securities measured at FVOCI Allowance for expected credit losses Investment Property Repossessed assets	17,984 160,571 (1,599) 300,192	Recognized in profit or loss (43,735)	Recognized in other comprehensive income (24,095) (44,750)	Closing Balance (6,112) 115,821 (1,599) 256,457 (136,841)

22. Provisions

Movements in provisions during the year are as follows:

	Tax Litigation	Other Litigations	Off-Balance Sheet	Integrati on costs	Total
Balance at 1 January 2020	282,008	545,613	54,442	183,495	1,065,558
Provisions made/(reversed) during the year	-	(182,866)	(7,891)	-	(190,757)
Provisions used during the year	-	-	-	(42,917)	(42,917)
Effect of movements in foreign exchange	-	3,008	413	-	3,421
Balance at 31 December 2020	282,008	365,755	46,964	140,578	835,305

23. Other liabilities

Other liabilities as at 31 December 2020 and 31 December 2019 are composed as follows:

	31 December 2020	31 December 2019
Accrued expenses	379,812	454,564
Sundry creditors	1,299,609	24,764
Suspense accounts	183,562	241,642
Bank cheques issued and payments in transit	135,741	163,349
Other tax liabilities	82,443	49,822
Due to third parties	22,377	22,618
Other accrued expenses	3	61,903
Total	2,103,547	1,018,662

24. Share capital and share premium

The issued share capital comprises one class of shares as follows:

	Number of Shares (In number)	Nominal Value (In Lek)	Total Shares Value (In Lek)
Share Capital at 31 December 2020	15,581,282	357	5,562,517,674

Share premium represents the amount paid from the shareholder in excess of the registered share capital. Intesa Sanpaolo S.p.A is the sole shareholder at 31 December 2020 and 31 December 2019.

25. Reserves

As at 31 December 2020 and 31 December 2019, the reserves were:

	31 December 2020	31 December 2019
Regulatory reserve (refer to a below)	1,125,444	1,130,983
Legal reserve (refer to b below)	694,640	694,640
Fair value reserve (refer to c below)	415,911	40,152
Revaluation reserve (refer to d below)	533,669	775,431
Other capital reserve (refer to e below)	714,556	714,555
Merger reserve (refer to f below)	2,813,396	2,813,396
Total	6,297,616	6,169,157

Nature and purpose of the reserves

- a. The regulatory reserve was established according to the Central Bank of Albania regulation "On the Bank's Regulatory Capital", no.69, dated 18 December 2014. Banks and branches of foreign banks are required to create reserves of 1.25% to 2% of total risk-weighted assets, by appropriating one fifth of the profit after taxes and before payment of dividends, until the balance on this measure reaches at least 1.25% of total risk-weighted assets. At 31 December 2020, the regulatory reserve represented 1.38% of total risk-weighted assets (2019: 1.38%).
- b. The legal reserve was established according to the provisions of the Commercial Law requiring the creation of reserves of 5% of the Bank's net income after deduction of accumulated losses from previous years, until the balance of this reserve reaches 10% of the Bank's share capital. At 31 December 2020, the balance represented 10% of the Bank's share capital (2019: 10%). This threshold is not mandatory, when the existing reserves are not less than one tenth of the Bank's share capital.
- c. The Fair value reserve represent the cumulative net change in fair value of the securities at FVOCI until the asset are derecognized or reclassified.
- d. The revaluation reserve relates to the revaluation of owed used property. The fair value reserve comprises the cumulative net change in the fair value of available-for-sale financial assets until the assets are derecognized or impaired.
- e. Other capital reserve represents the differences arising from the conversion of the Bank's share capital from USD to Lek. Out of this balance, the amount of Lek 297,666 thousand was received as at 1 January 2008 from the merger with former BIA, as raised by the same denomination currency change of the share capital.
- f. The merger reserve represents the contribution by owner equal to the net assets transferred considering that the Bank did not pay anything to acquire net assets of VBA (refer also to note 1).

26. Net Interest income

Interest income	2020	2019
Loans and advances to customers	2,056,352	2,262,668
Investment securities at amortized cost	1,702,886	1,888,249
Loans and advances to banks	(4,416)	129,550
Investment securities at FVOCI	355,594	46,154
Total interest income	4,110,416	4,326,621
Interest expenses		_
Demand and time deposits	700,641	738,275
Deposits from banks	126,414	89,070
Current accounts of customers	43,081	54,377
Lease liability	8,715	7,262
Total interest expenses	878,851	888,984
Net interest income	3,231,565	3,437,637

27. Net fee and commission income

	2020			2019	
Retail	Corporate		Retail	Corporate	
Banking	Banking	Total	Banking	Banking	Total
231,872	277,307	509,179	206,078	315,839	521,917
221,015	25,055	246,069	248,447	26,748	275,195
220,493	55,400	275,892	283,908	67,146	351,054
502	19,040	19,541	663	17,904	18,567
10,788	14,814	25,602	7,569	14,174	21,743
3,473	12,700	16,173	2,847	16,698	19,545
688,142	404,315	1,092,457	749,512	458,509	1,208,021
225,018	51,727	276,745	233,078	65,647	298,725
599	7,819	8,418	604	8,131	8,735
13,956	17,772	31,729	19,409	20,124	39,533
0	3,623	3,623	0	8,328	8,328
239,573	80,942	320,515	253,091	102,230	355,321
448,569	323,373	771,942	496,421	356,279	852,700
	Banking 231,872 221,015 220,493 502 10,788 3,473 688,142 225,018 599 13,956 0 239,573	Retail Banking Corporate Banking 231,872 277,307 221,015 25,055 220,493 55,400 502 19,040 10,788 14,814 3,473 12,700 688,142 404,315 225,018 51,727 599 7,819 13,956 17,772 0 3,623 239,573 80,942	Retail Banking Corporate Banking Total 231,872 277,307 509,179 221,015 25,055 246,069 220,493 55,400 275,892 502 19,040 19,541 10,788 14,814 25,602 3,473 12,700 16,173 688,142 404,315 1,092,457 225,018 51,727 276,745 599 7,819 8,418 13,956 17,772 31,729 0 3,623 3,623 239,573 80,942 320,515	Retail Banking Banking Total Banking Retail Banking 231,872 277,307 509,179 206,078 221,015 25,055 246,069 248,447 220,493 55,400 275,892 283,908 502 19,040 19,541 663 10,788 14,814 25,602 7,569 3,473 12,700 16,173 2,847 688,142 404,315 1,092,457 749,512 225,018 51,727 276,745 233,078 599 7,819 8,418 604 13,956 17,772 31,729 19,409 0 3,623 3,623 0 239,573 80,942 320,515 253,091	Retail Banking BankingCorporate Banking BankingRetail Banking BankingCorporate Banking Banking231,872277,307509,179206,078315,839221,01525,055246,069248,44726,748220,49355,400275,892283,90867,14650219,04019,54166317,90410,78814,81425,6027,56914,1743,47312,70016,1732,84716,698688,142404,3151,092,457749,512458,509225,018 59951,727 7,819276,745 8,418233,078 60465,647 8,13113,95617,77231,72919,40920,12403,623 239,5733,623 80,94208,328 253,091102,230

Fee and commissions do not include fees received for loans and advances to customers (transaction costs), which are adjusted on initial recognition for the carrying value of these financial assets as per effective interest rate method. Fee and commission income from contracts with customers are measured based on the consideration specified in a contract with a customer. The Bank recognizes revenue when it transfers control over a service to only a customer. The Bank provides banking services only to retail and corporate customers, including account management, provision of overdraft facilities, foreign currency transactions, credit card and servicing fees. Fees for ongoing account management are charged to the customer's account on a monthly basis. The Bank sets the rates separately for retail and corporate banking customers in each jurisdiction on a regular basis. Transaction-based fees for interchange, foreign currency transactions and overdrafts are charged to the customer's account when the transaction takes place Servicing fees are charged on a monthly basis and are based on fixed rates reviewed regularly by the Bank. Revenue from account service and servicing fees is recognized over time as the services are provided Revenue related to transactions is recognized at the point in time when the transaction takes place.

28. Net other income

	2020	2019
Foreign exchange gains	535,697	545,344
Other	4,412	2,964
Total	540,109	548,308

29. Other operating expenses, net

	2020	2019
Premium on deposits insurance	417,909	407,856
Loss on sale of fixed assets	596,941	329,627
(Gain)/loss on sundry net operational	2,615	(280,721)
Total	1,017,465	456,762

30. Personnel expenses

	2020	2019
Salaries	975,085	828,367
Social Insurance	132,662	126,304
Total salaries and social insurance	1,107,747	954,671
Personnel on secondment	57,058	53,717
Training & similar	800	892
Termination indemnities and others	18,644	56,313
Total	1,184,249	1,065,593

Salaries and social insurance for the year ended 31 December 2020 and 2019 are further breakdowns as follows:

	2020	2019
Board of Directors	6,345	7,632
Executive Management	321,914	279,312
Other personnel	779,488	667,727
Total	1,107,747	954,671

For the year ended 31 December 2020 the Bank had an average number of 657 employees (2019: 663).

31. Other administrative expenses

	2020	2019
Software maintenance	376,030	342,189
Telephone and electricity	47,399	63,343
Advertising and publications	20,140	50,231
Maintenance and repair	99,598	64,460
Stationery	46,942	41,210
Consulting, legal and professional fees	37,189	47,785
Security	66,705	70,851
Transport and security services	39,951	40,577
Travel and business trips	792	14,949
Insurance	12,946	12,966
Other	150,804	128,035
Total	898,496	876,596

Consulting, legal and professional fees for the year ended 31 December 2020 include statutory and non-statutory audit fees amounting to Lek 20.402 Million (2019: Lek 16.3 Million).

32. Income tax expenses

The components of income tax expense for the year ended 31 December 2020 and 2019 are:

	2020	2019
Current year	133,569	254,164
Current income tax in respect of prior years	-	24,802
Current tax expense	133,569	278,966
Origination and reversal of temporary differences	80,887	43,204
Deferred tax income	80,887	43,204
Income tax expense/(benefit)	214,456	322,170

Reconciliation of the income tax expense with the accounting profit for the year ended 31 December 2020 and 2019 is presented as follows:

	2020		2019	
Accounting Profit before tax		1,508,990		2,024,044
Income tax at domestic corporate tax rate	15.00%	226,349	15.00%	303,607
Tax effect of prior year taxes recognition	0.00%	-	1.23%	24,802
Non-deductible expenses	(6.15%)	(92,779)	(2.44%)	(49,443)
Origination and reversal of temporary differences	5.36%	80,886	2.13%	43,204
Income tax Expense	14.21%	214,456	15.92%	322,170

Non-deductible expenses are detailed as follows:

	2020	2019
Representations & Sponsorships expenses	56	192
Sundry operational losses	1,606	3,336
Operating leases expenses	2,149	2,459
Personnel expenses	5,579	7,855
Office expenses	6,565	6,776
Other provisions expenses	167,580	264,438
Litigation expenses	(182,866)	(14,763)
Losses on unrecoverable loans and overdrafts	134,162	135,802
Write down of inventory	(563,235)	(267,260)
Reversal of accruals related to prior years	(152,637)	(188,204)
Depreciation and amortization expenses	50,443	13,555
IFRS 16 impact	2,221	4,527
Allowance reversals for expected credit losses	(90,151)	(298,331)
Total	(618,528)	(329,618)
At 15%	92,779	49,443

The Bank prepaid income tax in the amount of Lek 164,811 thousand were paid during 2020 (2019: Lek 92,250 thousand).

33. Commitments and contingencies

Commitments and contingencies as at 31 December 2020 and 31 December 2019 are as follows:

	31 December 2020	31 December 2019
Contingent Assets	137,489,060	133,747,250
Guarantees received from credit customers	119,062,721	117,960,745
Guarantees received from Government	3,370,000	1,270,000
Money market future dated deals	114,460	-
Forward foreign exchange contracts	108,007	689,180
Other	14,833,872	13,827,325
Contingent Liabilities	12,209,699	10,641,380
Guarantees in favor of customers	4,873,518	4,456,045
Un-drawn credit facilities	7,136,265	4,868,369
Letters of credit	199,916	1,316,966

Guarantees are mainly represented by bid and performance bonds. Guarantees and letters of credit are collateralized by cash and deposits. The Bank issues guarantees to its customers. These instruments bear a credit risk similar to that of loans granted.

Contingent assets, like letters of credit and un-drawn credit facilities, are off-balance sheet items representing future commitments where the Bank acts as the beneficiary. Forward foreign exchange contracts are off- balance sheet items used to offset currency fluctuations and the effect on the income statement is reflected on the maturity date when the contract is executed.

Litigation

The Bank is defending an action related to a partial payment of a bank guarantee amounting EUR 4,830 thousand. The guarantee was issued in favor of an Albanian entity upon the request of its Parent Company Intesa Sanpaolo S.P.A. The Bank has successfully defended itself in a legal process, in which both the First Instance Court and Court of Appeal judged in favor of the Bank.

The plaintiff has appealed to the Supreme Court which has not yet issued its decision. Management does not consider that there are any legal grounds for the existing judgments in its favor to be overturned.

Nevertheless, given the complexity of the case, involving also the Italian Jurisdiction, and taking into consideration no other cases of that kind have been ever judged in the Albanian courts, some operational risks may occur. In the ordinary course of business, the Bank may be involved in other various claims and legal actions which in the opinion of management, the ultimate settlement of these matters will not have a material adverse effect on the Bank's financial position or changes in net assets, other than those for which a provision has already been included in these financial statements.

34. Related parties

The Bank's immediate parent is Intesa Sanpaolo S.p.A, which ultimately holds a 100% interest. The Bank, therefore, considers that it has a related-party relationship, in accordance with International Accounting Standard 24 Related Party Disclosures ("IAS 24") with the following:

Shareholders and parties related to shareholders:

• Intesa Sanpaolo S.p.A and its subsidiaries and associates

Key management personnel and parties related to key management personnel:

• Supervisory Board members, Management Board members and other key management personnel defined as persons having authority and responsibility for planning, directing and controlling the activities of the Bank, directly or indirectly, including any director (whether executive or otherwise) of the Bank, collectively "key management personnel", close family members of key management personnel, and companies and un-incorporated businesses controlled, or jointly controlled by key management personnel and/or their close family members.

The following transactions have taken place during the year ended 31 December 2020 and 31 December 2019:

	ISP Group companies		Key management personnel and Other related parties		
	31 Dec 2020	31 Dec 2019	31 Dec 2020	31 Dec 2019	
Assets at end of year	14,644,700	15,144,703	50,922	25,146	
Loans and advances to credit institutions	14,624,359	15,120,270	-	-	
Loans and advances to customers	-	-	50,922	25,146	
Other assets	20,341	24,433	-	-	
Liabilities at end of year	82,908	101,961	453,982	415,919	
Loans and advances from credit institutions	-	-	-	-	
Customer deposits	-	-	453,982	415,919	
Invoices to be received	82,908	101,961	-	-	
Off balance sheet	2,373,497	3,004,221	-	-	
Letter of credit/Letter of Guarantees given	249,535	966,605	-	-	
Letter of credit/Letter of Guarantees received	1,923,600	1,845,237	-	-	
Foreign currency contracts	200,362	192,379	-	-	
Commitments given	-	-	-	-	
Collaterals	-	-	-		
Income for year ending	60,892	126,015	1,588	2,092	
Interest income	10,815	78,897	1,208	1,858	
Commission Income	50,077	47,118	380	234	
Expenses for the year ending	292,968	260,654	328	319	
Interest expense	39,340	28,332	328	319	
Commission expense and others	22,337	21,669			
Other Administrative Costs	231,291	210,653			
Compensation of Key Managers	5				
Net Salary	-	-	-	74,566	
Net Bonus paid	-	-	22,392	25,667	
Social & Health Insurance	-	-	4,345	4,354	
Other expenses (Lecoip)	-	-	13,387	13,240	
Other expenses	-	-	14,539	13,115	

35. Subsequent events

The management of the Bank is not aware of any subsequent events that would require either adjustments or additional disclosures in the financial statements.