JSC Cartu Bank

Consolidated financial statements

Year ended 31 December 2024

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Independent auditor's report

To the Shareholder and Supervisory Board of JSC Cartu Bank

Report on the audit of the consolidated financial statements

Opinion

We have audited the consolidated financial statements of JSC Cartu Bank and its subsidiaries (hereinafter, the "Group"), which comprise the consolidated statement of financial position as at 31 December 2024, and the consolidated statement of comprehensive income, consolidated statement of changes in equity and consolidated statement of cash flows for the year then ended, and notes to the consolidated financial statements, including material accounting policy information.

In our opinion, the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of the Group as at 31 December 2024 and its consolidated financial performance and its consolidated 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 consolidated financial statements section of our report. We are independent of the Group in accordance with the International Ethics Standards Board for Accountants' (IESBA) International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) together with the ethical requirements that are relevant to our audit of the consolidated financial statements in Georgia, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Other information included in the Group's 2024 Management Report

Other information consists of the information included in the Group's 2024 Management Report, other than the consolidated financial statements and our auditor's report thereon. Management is responsible for the other information.

Our opinion on the consolidated financial statements does not cover the Management Report and we do not express any form of assurance conclusion thereon in our report on the audit of the consolidated financial statements.

In connection with our audit of the consolidated financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the consolidated financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.



Responsibilities of management and the Supervisory Board for the consolidated financial statements

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

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

The Supervisory Board is responsible for overseeing the Group's financial reporting process.

Auditor's responsibilities for the audit of the consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated 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 consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.



- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group as a basis for forming an opinion on the consolidated financial statements. We are responsible for the direction, supervision and review of the audit work performed for the purposes of the group audit. We remain solely responsible for our audit opinion.

We communicate with the Supervisory Board 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.

Report in accordance with the requirements of Article 7, paragraph 10 of the Georgian Law on Accounting, Reporting and Auditing

In our opinion, based on the work undertaken in the course of the audit:

- The information given in the Management Report for the financial year for which the consolidated financial statements are prepared is consistent with the consolidated financial statements; and
- The Management Report includes the information required by Article 7 of the Georgian Law on Accounting, Reporting and Auditing and complies with respective regulatory normative acts.

Ana Kusrashvili (SARAS-A-169041)

On behalf of EY LLC (SARAS-F-855308)

8 May 2025

Tbilisi, Georgia



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- 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 Group's internal control.
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- 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 Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.



- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group as a basis for forming an opinion on the consolidated financial statements. We are responsible for the direction, supervision and review of the audit work performed for the purposes of the group audit. We remain solely responsible for our audit opinion.

We communicate with the Supervisory Board 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.

Report in accordance with the requirements of Article 7, paragraph 10 of the Georgian Law on Accounting, Reporting and Auditing

In our opinion, based on the work undertaken in the course of the audit:

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- The Management Report includes the information required by Article 7 of the Georgian Law on Accounting, Reporting and Auditing and complies with respective regulatory normative acts.

Ana Kusrashvili (SARAS-A-169041)

On behalf of EY LLC (SARAS-F-855308)

8 May 2025

Tbilisi, Georgia

Consolidated statement of financial position

For the year ended 31 December 2024

(thousands of Georgian lari)

_	Notes	31 December 2024	31 December 2023
Assets			
Cash and cash equivalents	5	438,468	700,326
Amounts due from credit institutions	6	352,948	371,382
Loans to customers	7	1,068,159	833,903
Investment securities	8	67,917	62,897
Property and equipment	9	14,125	13,888
Right of use assets	10	8,229	7,160
Intangible assets	11	10,406	9,012
Current income tax asset	15	10,399	_
Reinsurance contract assets		2,766	2,685
Other assets	12	49,009	94,079
Total assets		2,022,426	2,095,332
Liabilities			
Amounts due to credit institutions		9	9
Amounts due to customers	13	1,460,862	1,562,461
Current income tax liability		, , <u> </u>	6,006
Deferred income tax liability	15	2,429	2,137
Lease liabilities	10	8,488	7,167
Insurance contract liabilities		3,836	3,360
Reinsurance contract liabilities		425	307
Provisions	17	620	263
Subordinated debt	14	85,638	81,058
Other liabilities	12	7,018	15,825
Total liabilities		1,569,325	1,678,593
Equity			
Share capital	16	114,430	114,430
Additional paid-in capital	16	23,846	25,764
Retained earnings and other reserves	16	313,519	275,300
Total equity attributable to shareholders of the Bank	.0	451,795	415,494
Non-controlling interests		1,306	1,245
Total equity		453,101	416,739
Total equity and liabilities		2,022,426	2,095,332

Signed and authorized for release on behalf of the Board of Directors of the Bank on 8 May 2025:

Zurab Gelenidze Chief Executive Officer

Givi Lebanidze Chief Financial Officer

Consolidated statement of financial position

For the year ended 31 December 2024

(thousands of Georgian Iari)

	Notes	31 December 2024	31 December 2023
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Non-controlling interests		1,306 453,101	1,245 416,739
Total equity			
Total equity and liabilities		2,022,426	2,095,332

Signed and authorized for release on behalf of the Board of Directors of the Bank on 8 May 2025:

Zurab Gelenidze

Chief Executive Officer

Givi Lebanidze

Chief Financial Officer

Consolidated statement of comprehensive income

For the year ended 31 December 2024

(thousands of Georgian lari)

	Notes	2024	2023
Interest revenue calculated using effective interest rate			
Loans to customers		82,198	72,852
Investment securities		6,802	5,631
Amounts due from credit institutions		21,723	19,126
Other interest income		262	
		110,985	97,609
Interest expense			
Amounts due to credit institutions		(1)	(1)
Amounts due to customers		(27,935)	(21,733)
Subordinated debt		(5,852)	(5,637)
Lease liabilities		(634)	(100)
		(34,422)	(27,471)
Net interest income		76,563	70,138
Credit loss recovery/(expense) on interest bearing assets	18	(12,767)	2,561
Net interest income after credit losses		63,796	72,699
Fee and commission income	19	9,157	7,664
Fee and commission expense	19	(5,270)	(5,223)
Net gains/(losses) from foreign currencies			
- dealing		11,161	6,947
- translation differences		1,223	(835)
Insurance revenue Result from reinsurance contracts held		6,616 (1,193)	6,068 1,609
Insurance service expenses		(3,264)	(5,389)
Other income, net	20	13,164	12,378
Non-interest income	20	31,594	23,219
Personnel expenses	21	(25,834)	(21,359)
Other operating expenses	21	(20,651)	(23,420)
Depreciation and amortisation	9,10,11	(5,037)	(4,084)
Other reversal of impairment/(Impairment and provisions)	18	1,101	(498)
Non-interest expenses		(50,421)	(49,361)
Profit before income tax		44,969	46,557
Income tax expense	15	(8,617)	(10,891)
Net profit for the period		36,352	35,666
Attributable to:			
shareholders of the Parent		36,291	35,475
non-controlling interests		61	191
		36,352	35,666
Other comprehensive income for the yea Movement in fair value reserve for investment securities		40	40
measured at fair value through other comprehensive income	8	10	12
Total comprehensive income for the year		36,362	35,678
Attributable to: shareholders of the Parent non–controlling interests		36,301 61	35,487 191
non controlling intorooto		01	101

Consolidated statement of changes in equity

For the year ended 31 December 2024

(thousands of Georgian lari)

_	Attribut	able to share	holders of the	e Group	_	
_	Share capital	Additional paid–in capital	Retained earnings and other reserves	Total	Non- controlling interests	Total equity
1 January 2023	114,430	25,764	239,813	380,007	1,054	381,061
Profit for the year	_	_	35,475	35,475	191	35,666
Other comprehensive income for the year (Note 8)	_	_	12	12	_	12
Total comprehensive income for the year	_		35,487	35,487	191	35,678
31 December 2023	114,430	25,764	275,300	415,494	1,245	416,739
Profit for the year Other comprehensive income for	_	_	36,291	36,291	61	36,352
the year (Note 8)			10	10		10
Total comprehensive income for the year			36,301	36,301	61	36,362
Transfer of the portion of additional paid-in capital associated with the extinguished subordinated debts (Note 16)		(1,918)	1,918		<u>-</u> _	<u> </u>
31 December 2024	114,430	23,846	313,519	451,795	1,306	453,101

Consolidated statement of cash flows

For the year ended 31 December 2024

(thousands of Georgian lari)

	Notes	2024	2023
Cash flows from operating activities: Profit before income tax		44,969	46,557
Adjustments for non-cash Items: (Recovery)/Provision for impairment losses on interest bearing	40	40.707	(2.504)
assets (Recovery)/Provision for impairment losses on non-interest bearing assets (Recovery)/Provision on other operations (Reversal)/Impairment of repossessed assets Modification (gain)/loss Net gain on disposal of property and equipment Net gain on disposal of repossessed assets Gain on Asset Recovery Depreciation and amortization expense	18 18 18 18 7 20 20	12,767 (85) 355 (1,371) 2,672 (1,131) (11,612) – 5,037	(2,561) 424 64 10 (494) - (1,826) (9,074) 4,084
Change in interest accruals, net Gain on foreign exchange operations from translation differences Cash inflow from operating activities before changes in operating assets and liabilities	2	(87) (1,223) 50,291	(84) 835 37,935
Changes in operating assets and liabilities Amounts due from credit institutions Loans to customers Other assets Amounts due to credit institutions Amounts due to customers Other liabilities Cash inflow from operating activities before taxation		20,663 (230,655) (10,570) 1 (139,514) (7,650) (317,434)	(133,655) (83,404) (24,178) 2 449,045 13,146 258,891
Income tax paid Net cash inflow/(outflow) from operating activities		(24,731) (342,165)	(16,860) 242,031
Cash flows from investing activities: Purchase of property and equipment Purchase of intangible assets Proceeds from sale of property and equipment Proceeds from sale of repossessed assets Acquisition of investments securities at amortised cost Net cash inflow from investing activities	9 11 9 12 8	(2,162) (3,062) 1,430 67,536 (5,000) 58,742	(2,466) (4,836) 30 34,385 (26,000) 1,113
Cash flows from financing activities: Payment of lease liabilities Net cash outflow from financing activities Effect of changes in foreign exchange rate fluctuations on cash and cash equivalents Net increase/(decrease) in cash and cash equivalents	10	(1,491) (1,491) 23,056 (261,858)	(1,824) (1,824) 4,422 245,742
Cash and cash equivalents, beginning	5	700,326	454,584
Cash and cash equivalents, ending	5	438,468	700,326

During 2024 The Group received GEL 107,144 interest (2023: GEL 75,980) and paid GEL interest 31,855 (2023: GEL 27,033).

Material non-cash transactions:

► In 2024 change in other assets includes repossession of collaterals in amount of 10,172 GEL (2023: GEL 26,736).

1. Principal activities

Joint Stock Company Cartu Bank (the "Bank") was incorporated in Georgia in 1996. The Bank is regulated by the National Bank of Georgia (the "NBG") and conducts its business under general license number 229. The Bank's primary business consists of commercial activities, originating loans and guarantees, investing in securities, trading foreign currencies and taking deposits.

The registered office of the Bank is located on 39a Chavchavadze Avenue, Tbilisi, Georgia.

As at 31 December 2024, the Bank had four service centers and two division operating in Tbilisi, division in Shekvetili and service centers in Gori, Telavi, Kutaisi and Batumi. As at 31 December 2023, the Bank had five service centers and one division operating in Tbilisi, division in Shekvetili and service centers in Gori, Telavi, Kutaisi and Batumi.

The Bank is the parent company of the group (the "Group"), which consists of the following entities:

	Ownership interest (%)			
Name	Country of operation	Legal address	2024	Type of operation
Cartu Broker LLC	Georgia	39a Ilia Chavchavadze av. Tbilisi	100.00%	Brokerage
Insurance Company Cartu JSC	Georgia	39a Ilia Chavchavadze av. Tbilisi	91.39%	Insurance
Investment Company Cartu Invest LLC	Georgia	39a Ilia Chavchavadze av. Tbilisi	100.00%	Dormant
Geoplast LLC	Georgia	Village didi Lilo, Isani-Samgori, Tbilisi	100.00%	Dormant

As at 31 December 2024 and 2023 International Charity Foundation Cartu (the "Parent" or the "Shareholder") owned 100% of the Group's shares.

As of December 31, 2023 the Bank was ultimately controlled by Uta Ivanishvili, in 2024 there was a change in the ownership structure. As of December 31, 2024, Uta Ivanishvili holds 35% of the ownership, the remaining shares are held by multiple individuals, each holding less than 5%. No single shareholder, apart from Uta Ivanishvili, holds a sufficient interest to exercise control or significant influence over the Company.

These consolidated financial statements have not yet been approved by the Parent on the general meeting of shareholders of the Group. The shareholders have the power and authority to amend the financial statements after the issuance.

2. Basis of preparation

General

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

The consolidated financial statements have been prepared under the historical cost convention except as disclosed in the accounting policies below.

These consolidated financial statements are presented in Georgian lari ("GEL"), all values are rounded to the nearest thousand GEL, except when otherwise indicated.

The Group has prepared its consolidated financial statements on the basis that it will continue to operate as a going concern.

3. Summary of material accounting policies

Changes in accounting policies

The Group has not early adopted any new standards, interpretations or amendments that have been issued but are not yet effective in these consolidated financial statements.

The following amendments to existing IFRS accounting standards became effective for annual periods beginning on 1 January 2024:

- Classification of Liabilities as Current or Non-current and Non-current Liabilities with Covenants Amendments to IAS 1;
- Lease Liability in a Sale and Leaseback Amendments to IFRS 16;
- ▶ Disclosures: Supplier Finance Arrangements Amendments to IAS 7 and IFRS 7.

None of these amendments had an impact on the Group's consolidated financial statements at 31 December 2024.

3. Summary of material accounting policies (continued)

Standards issued but not yet effective

New and amended standards and interpretations that are issued but not yet effective are being assessed by the Group to determine the impact on the separate financial statements. As explained above, this would include standards and amendments that would already be effective based on the new standard or amendment, but the local endorsement is still in progress or has resulted in a later effective date.

Amendments to the Classification and Measurement of Financial Instruments—Amendments to IFRS 9 and IFRS 7

On 30 May 2024, the IASB issued Amendments to IFRS 9 and IFRS 7, Amendments to the Classification and Measurement of Financial Instruments (the Amendments). The Amendments include:

- A clarification that a financial liability is derecognised on the 'settlement date' and introduce an accounting policy choice (if specific conditions are met) to derecognise financial liabilities settled using an electronic payment system before the settlement date;
- Additional guidance on how the contractual cash flows for financial assets with environmental, social and corporate governance (ESG) and similar features should be assessed;
- Clarifications on what constitute 'non-recourse features' and what are the characteristics of contractually linked instruments;
- The introduction of disclosures for financial instruments with contingent features and additional disclosure requirements for equity instruments classified at fair value through other comprehensive income (OCI).

The Amendments are effective for annual periods starting on or after 1 January 2026. Early adoption is permitted, with an option to early adopt the amendments for classification of financial assets and related disclosures only. The Group is currently not intending to early adopt the Amendments. With respect to the amendments on the derecognition of financial liabilities that are settled through an electronic payment system, the Bank is currently performing an assessment of all material electronic payment systems utilised in the various jurisdictions it operates, in order to assess whether the amendments will result in a material change with respect to current practices and whether it meets the conditions to apply the accounting policy option to derecognise such financial liabilities before the settlement date. Moreover, the Bank is reviewing all its other payment systems (such as cheques, credit cards, debit cards) to ensure that the corresponding financial assets are derecognised when the right to cash flows are extinguished and that the corresponding financial liabilities are derecognised on settlement date.

In addition, the Group is assessing the impact of the Amendments on its financial assets that include environmental, social and governance (ESG)–linked features and other similar contingent features, as well as on non–recourse financing and contractually linked instruments. Based on the initial assessment performed, the amendments in these areas are not expected to have a material impact on the financial statements, however, the assessment is yet to be concluded.

IFRS 18 Presentation and Disclosure in Financial Statements

In April 2024, the IASB issued IFRS 18 Presentation and Disclosure in Financial Statements, which replaces IAS 1 Presentation of Financial Statements. IFRS 18 introduces new requirements for presentation within the statement of profit or loss, including specified totals and subtotals. Furthermore, entities are required to classify all income and expenses within the statement of profit or loss into one of five categories: operating, investing, financing, income taxes and discontinued operations, whereof the first three are new.

It also requires disclosure of newly defined management–defined performance measures, which are subtotals of income and expenses, and includes new requirements for aggregation and disaggregation of financial information based on the identified 'roles' of the primary financial statements and the notes.

Narrow–scope amendments have been made to IAS 7 Statement of Cash Flows, which include changing the starting point for determining cash flows from operations under the indirect method, from 'profit or loss' to 'operating profit or loss' and removing the optionality around classification of cash flows from dividends and interest. In addition, there are consequential amendments to several other standards.

IFRS 18, and the amendments to the other standards, are effective for reporting periods beginning on or after 1 January 2027, but earlier application is permitted and must be disclosed. IFRS 18 will apply retrospectively.

The Bank is currently working to identify all impacts the amendments will have on the primary financial statements and notes to the financial statements.

3. Summary of material accounting policies (continued)

Basis of consolidation

Subsidiaries, which are those entities which are controlled by the Group, are consolidated. Control is achieved when the Group is exposed, or has rights, to variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee.

Fair value measurement

Fair values of financial instruments measured at amortised cost are disclosed in Note 23.

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. The fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either:

- In the principal market for the asset or liability; or
- In the absence of a principal market, in the most advantageous market for the asset or liability.

The principal or the most advantageous market must be accessible by the Group. The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest. Fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

The Group uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximising the use of relevant observable inputs and minimising the use of unobservable inputs. All assets and liabilities for which fair value is measured or disclosed in consolidated financial statements are categorized within the fair value hierarchy, described as follows, based on the lowest level input that is significant to the fair value measurement as a whole:

- Level 1 quoted (unadjusted) market prices in active markets for identical assets or liabilities;
- Level 2 valuation techniques for which the lowest level input that is significant to the fair value measurement is directly or indirectly observable;
- ▶ Level 3 valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable.

For assets and liabilities that are recognised in consolidated financial statements on a recurring basis, the Group determines whether transfers have occurred between levels in the hierarchy by re-assessing categorization (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting period.

Financial assets and liabilities

Guarantees

Guarantees are contracts that provide compensation if another party fails to perform a contractual obligation. Guarantees are in scope of IFRS 9 and effectively are a form of a contingent loan commitment.

Provision for Performance guarantees are measured under IFRS 9.

Renegotiated loans

Where possible, the Group seeks to restructure loans rather than to take possession of collateral or begin enforcement procedures. This may involve extending the payment arrangements and the agreement of new loan conditions.

The Group derecognises a financial asset, such as a loan to a customer, when the terms and conditions have been renegotiated to the extent that, substantially, it becomes a new loan, with the difference recognised as a derecognition gain or loss, to the extent that an impairment loss has not already been recorded. The newly recognised loans are classified as Stage 1 for ECL measurement purposes, unless the new loan is deemed to be purchased or originated credit–impaired (POCI). When assessing whether or not to derecognise a loan to a customer, amongst others, the Group considers the following factors:

- ► Change in currency of the loan;
- Change in counterparty;
- ▶ If the modification is such that the instrument would no longer meet the SPPI criterion.

3. Summary of material accounting policies (continued)

Renegotiated loans (continued)

If the modification does not result in cash flows that are substantially different, the modification does not result in derecognition. Based on the change in cash flows discounted at the original EIR, the Group records a modification gain or loss, presented within interest revenue calculated using EIR in the statement of profit or loss, to the extent that an impairment loss has not already been recorded.

For modifications not resulting in derecognition, the Group also reassesses whether here has been a significant increase in credit risk or whether the assets should be classified as credit—impaired.

Cash and cash equivalents

Cash and cash equivalents consist of cash on hand, amounts due from the National Bank of Georgia, excluding mandatory reserves, and amounts due from credit institutions that mature within ninety days of the date of origination and are free from contractual encumbrances.

Mandatory reserve deposit with the NBG

Mandatory reserve deposits with the NBG are carried at amortised cost and represent interest bearing mandatory reserve deposits which are not available to finance the Group's day to day operations and hence are not considered as part of cash and cash equivalents for the purposes of the statement of cash flows. Mandatory reserve is included in amounts due from credit institutions.

Taxation

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

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

A deferred tax asset is recorded only to the extent that it is probable that taxable profit will be available against which the deductible temporary differences can be utilised. Deferred tax assets and liabilities are measured at tax rates that are expected to apply to the period when the asset is realised or the liability is settled, based on tax rates (applicable to undistributed profits) and tax laws, that have been enacted or substantively enacted by the end of the reporting period.

Georgia also has various operating taxes that are assessed on the Group's activities. These taxes are included as a component of other operating expenses.

Leases

Short-term leases and leases of low-value assets

The Group applies the short-term lease recognition exemption to its short-term leases (i.e., those leases that have a lease term of 12 months or less from the commencement date and do not contain a purchase option). It also applies the lease of low-value assets recognition exemption to leases of office equipment that are considered of low value. Lease payments on short-term leases and leases of low-value assets are recognised as expense on a straight-line basis over the lease term.

Property and equipment

Property and equipment are carried at cost, excluding the costs of day-to-day servicing, less accumulated depreciation and any accumulated impairment.

Depreciation is calculated on a straight-line basis using the following annual depreciation rates:

Buildings and other real estate 2–3% Furniture and office fixtures 10–20% Computers and office equipment 10–33% Other 5–20%

3. Summary of material accounting policies (continued)

Intangible assets

Intangible assets include computer software and licenses.

As at 31 December 2024 and 2023 the Group did not own intangible assets with indefinite useful lives.

Intangible assets are amortised over the useful economic lives of 5–10 years and assessed for impairment whenever there is an indication that the intangible asset may be impaired. Amortisation periods and methods for intangible assets with indefinite useful lives are reviewed at least at each financial year–end.

Repossessed Assets

For certain repossessed collateral, the Group has granted previous owners—at the date of repossession—the right to repurchase the assets at prices equal to or higher than the loan amount covered by the repossession. This right is typically effective for a period of 6 to 24 months from the repossession date, during which time the repossessed collateral may not be disposed of to third parties. In some cases, an extension of the repurchase right is offered to the former owners of the property.

As at 31 December 2024, the carrying value of the repossessed collaterals subjected to the repurchase agreement was GEL 9,837 (2023: GEL 1,140).

Provisions

Provisions are recognised when the Group has a present legal or constructive obligation as a result of past events, and it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate of the amount of obligation can be made.

Contingencies

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

Share capital

Ordinary shares are classified as equity. External costs directly attributable to the issue of new shares, other than on a business combination, are shown as a deduction from the proceeds in equity. Any excess of the fair value of consideration received over the par value of shares issued is recognised as additional paid–in capital.

Dividends are recognised as a liability and deducted from equity at the reporting date only if they are declared before or on the reporting date. Dividends are disclosed when they are proposed before the reporting date or proposed or declared after the reporting date but before the consolidated financial statements are authorised for issue. All expenses associated with dividend distribution are added to dividend amount and recorded directly through equity.

Recognition of income and expenses

Revenue is recognised to the extent that it is probable that the economic benefits will flow to the Group and the revenue can be reliably measured. The following specific recognition criteria must also be met before revenue is recognised:

Interest and similar income and expense

The Group calculates interest revenue on debt financial assets measured at amortized cost by applying the effective interest rate (EIR) to the gross carrying amount of financial assets other than credit–impaired assets. EIR is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or a shorter period, where appropriate, to the net carrying amount of the financial asset or financial liability. The calculation takes into account all contractual terms of the financial instrument (for example, prepayment options) and includes any fees or incremental costs that are directly attributable to the instrument and are an integral part of the effective interest rate, but not future credit losses. The carrying amount of the financial asset or financial liability is adjusted if the Group revises its estimates of payments or receipts. The adjusted carrying amount is calculated based on the original effective interest rate and the change in carrying amount is recorded as interest revenue or expense.

When a financial asset becomes credit–impaired, the Group calculates interest revenue by applying the effective interest rate to the net amortised cost of the financial asset. If the financial assets cures and is no longer credit–impaired, the Group reverts to calculating interest revenue on a gross basis.

3. Summary of material accounting policies (continued)

Recognition of income and expenses (continued)

Fee and commission income

The Group earns fee and commission income from several types of services it provides to its customers. Fee income can be divided into the following categories:

Fee income earned from services that are provided over a certain period of time

Fees earned for the provision of services over a period of time are accrued over that period. These fees include commission income on guarantees and letters of credit. Loan commitment fees for loans that are likely to be drawn down and other credit related fees are deferred (together with any incremental costs) and recognised as an adjustment to the effective interest rate on the loan.

Fee income earned at a point in time

Fees arising from settlement and cash operations are recognized upon completion of the underlying transactions. Each cash operation and settlement operation is treated as a consolidated performance obligation.

Fee income from providing transaction services

Fees arising from negotiating or participating in the negotiation of a transaction for a third party – such as where the Group's performance obligation is the arrangement of the acquisition of shares or other securities – are recognised on completion of the underlying transaction. Fees or components of fees that are linked to certain performance obligations are recognised after fulfilling the corresponding criteria. When the contract provides for a variable consideration, fee and commission income is only recognized to the extent that it is probable that a significant reversal in the amount of cumulative revenue recognized will not occur until the uncertainty associated with the variable consideration is subsequently resolved.

Foreign currency translation

These consolidated financial statements are presented in thousands of Georgian lari ("GEL"), which is the Group's functional and presentation currency. Transactions in foreign currencies are initially recorded in the functional currency, converted at the rate of exchange ruling at the date of the transaction

Differences between the contractual exchange rate of a transaction in a foreign currency and the NBG exchange rate on the date of the transaction are included in gains less losses from dealing in foreign currencies. The official GEL exchange rates at 31 December 2024 and 2023 were 2.8068 GEL and 2.6894 GEL to 1 USD, respectively, 2.9306 GEL and 2.9753 GEL to 1 EUR, respectively.

Insurance Contracts

Level of aggregation

The Group identifies portfolios of insurance contracts. A portfolio of insurance contracts is defined as insurance contracts that are subject to similar risks and managed together. Portfolios are further disaggregated into profitability—based groups of insurance contracts that are, on initial recognition: (a) onerous, if any, (b) profitable, with no significant possibility of subsequently becoming onerous, if any, and (c) remaining contracts, if any. IFRS 17 prohibits to include contracts issued more than one year apart in the same group, a requirement commonly referred to as annual cohort requirement.

Contract boundary

The contract boundary concept is used to determine which cash flows are considered in the measurement of an insurance contract. Cash flows that are not within the boundary of an insurance contract relate to future insurance contracts. The Group generally determines the contract boundary with a reference to its ability to reprice the insurance contract as a whole.

Expected future cash flows

Included in the measurement of each group of contracts within the scope of IFRS 17 are all the future cash flows within the boundary of each group of contracts. The estimates of these future cash flows are based on probability–weighted expected future cash flows. The Group estimates which cash flows are expected and the probability that they will occur as at the measurement date. In making these expectations, the Group uses information about past events, current conditions, and forecasts of future conditions.

3. Summary of material accounting policies (continued)

Insurance Contracts (continued)

Premium Allocation Approach

The Groups uses premium allocation approach (PAA). When measuring liabilities for remaining coverage, the PAA is broadly similar to the Group's previous accounting treatment under IFRS 4. The Group does not consider effect of time value of money on a carrying value of insurance liability for the remaining term, as at initial recognition the group assumes that time between performance of the service and payment of related premium is less than 12 months.

For limited number of insurance and reinsurance contracts which have term more than one year, group chooses PPA approach after review of contracts, as the group does not expect that that remaining insurance term (after 12 months) liability to be materially different from basic valuation model

4. Significant accounting judgments and estimates

Estimation uncertainty

In the process of applying the Group's accounting policies, management has used its judgments and made estimates in determining the amounts recognized in consolidated financial statements. The most significant use of judgments and estimates are as follows:

Impairment losses on financial assets

The measurement of impairment losses under IFRS 9 across all categories of financial assets requires, judgement, in particular the estimation of the amount and timing of future cash flows and collateral values when determining impairment losses and the assessment of a significant increase in credit risk. These estimates are driven by a number of factors, changes in which can result in different levels of allowances. The Group's ECL calculations are outputs of complex models with a number of underlying assumptions regarding the choice of variable inputs and their interdependencies. Elements of the ECL models that are considered accounting judgements and estimates include:

- ► The Group's model which assigns PDs to the individual grades:
- ► The Group's criteria for assessing if there has been a significant increase in credit risk and so allowances for financial assets should be measured on a lifetime ECL (LTECL) basis;
- ▶ The segmentation of financial assets when their ECL is assessed on a collective basis;
- Development of ECL models, including the various formulae and the choice of inputs:
- Determination of relationship between borrowers' financials and, macroeconomic inputs, such as GDP growth rate, foreign exchange rates and inflation rate, and the effect on PDs, EADs and LGDs;
- Selection of forward-looking macroeconomic scenarios and their probability weightings, to derive the economic inputs into the ECL models,
- Assessing values of collaterals, including the assessment of timing of cash inflows from collaterals.

The Group calculates impairment losses on cash and cash equivalents, amounts due from credit Institutions, loans to customers, investment securities, other financial assets, unused credit lines and issued guarantees which are disclosed in Notes 5, 6, 7, 8, 12, 17 respectively.

Fair value of financial instruments

Where the fair values of financial assets and financial liabilities recorded or disclosed in the statement of financial position cannot be derived from active markets, they are determined using a variety of valuation techniques that include the use of mathematical models. The input to these models is taken from observable markets where possible, but where this is not feasible, a degree of judgment is required in establishing fair values. Additional details are provided in Note 23.

Valuation of repossessed assets

The valuation of repossessed assets is carried out on regular basis by an independent firm of valuators which holds a recognised and relevant professional qualification and who have recent experience in valuation of assets of similar location and category. The values of most of the assets have been estimated using the market approach. Additional details are provided in Note 12.

5. Cash and cash equivalents

Cash and cash equivalents comprise:

	2024	2023
Cash on hand	34,764	29,068
Current accounts with the NBG	5,861	5,248
Current accounts with other credit institutions	351,864	512,048
Time deposits with credit institutions up to 90 days	46,000	153,971
Less: allowance for impairment	(21)	(9)
Cash and cash equivalents	438,468	700,326

As at 31 December 2024, current accounts and time deposit accounts with credit institutions denominated in USD, EUR, GEL and other currencies represent 72.17%, 26.1%, 0.06% and 1,67% of total current and time deposit accounts respectively (31 December 2023: USD 66%, GEL 33%, EUR 1%).

All balances of cash equivalents are held at amortized cost and are allocated to Stage 1.

6. Amounts due from credit institutions

Amounts due from credit institutions comprise:

	2024	2023
Mandatory reserve with the NBG	349,365	278,574
Time deposits for more than 90 days	3,656	92,868
Less: allowance for impairment	(73)	(60)
Amounts due from credit institutions	352,948	371,382

In 2024 the credit institutions are required to maintain a mandatory interest earning cash deposit with the NBG at the level of 5% and 25% (2023: 5% and 20%) of the average of funds attracted from customers and non-resident financial institutions for the appropriate two-week period in GEL and foreign currencies, respectively.

An analysis of changes in the gross carrying value in relation to amounts due from credit institutions (excluding mandatory reserves with the NBG) during the year ended 31 December 2024 is as follows:

	Gross carrying value
As at 1 January 2024 New assets originated	92,868 2,712,000
Assets repaid	(2,802,326)
Foreign exchange and other movements	1,114
At 31 December 2024	3,656

An analysis of changes in the gross carrying value in relation to amounts due from credit institutions during the year ended 31 December 2023 is as follows:

	Gross carrying value
As at 1 January 2023	3,709
New assets originated	2,470,500
Assets repaid	(2,382,257)
Foreign exchange and other movements	916
At 31 December 2023	92,868

All balances of amounts due from credit institutions are held at amortized cost and are allocated to Stage 1.

7. Loans to customers

Loans to customers comprise:

	2024	2023
Corporate loans	1,090,955	848,480
Loans to individuals	36,721	34,338
Gross loans to customers at amortized cost	1,127,676	882,818
Less: allowance for impairment	(59,517)	(48,915)
Loans to customers at amortized cost	1,068,159	833,903

An analysis of changes in the gross carrying value in relation to corporate lending during the year ended 31 December 2024 is as follows:

Corporate loans at amortized cost,					
gross	Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying value as at					
1 January 2024	671,722	26,035	149,284	1,439	848,480
New assets originated or purchased	756,910	_	_	_	756,910
Assets repaid or derecognised	(508,496)	(2,647)	(23,886)	(211)	(535,240)
Resegmentation	1,764	_	54	_	1,818
Transfers to Stage 1	_	_	_	_	_
Transfers to Stage 2	(126,450)	126,450	_	_	_
Transfers to Stage 3	(4,104)	(12,385)	16,489	_	_
Unwinding of discount	_	_	1,997	_	1,997
Changes to contractual cash flows due					
to modifications not resulting in					
derecognition	(2,128)	(24)	(517)	_	(2,669)
Recoveries	_	` _	148	_	148
Amounts written off	_	_	(4,125)	_	(4,125)
Foreign exchange and other movements	17,967	3,496	2,124	49	23,636
				4.077	
At 31 December 2024	807,185	140,925	141,568	1,277	1,090,955
Corporate loans at amortized cost,					
allowance for ECL	Stage 1	Stage 2	Stage 3	POCI	Total
ECL as at 1 January 2024	4,483	941	42,614	7	48,045
New assets originated or purchased	4,927	_	_	_	4,927
Assets repaid or derecognised	(2,684)	(105)	(6,331)	(1)	(9,121)
Resegmentation	25			(' /	(3,121)
	25	_	29	(·) -	54
Transfers to Stage 1	_		29 -	- -	
Transfers to Stage 2	_ (1,578)	- - 1,578	<u>-</u>	- - -	
Transfers to Stage 2 Transfers to Stage 3	_	- 1,578 (174)	29 - - 193	- - - -	
Transfers to Stage 2 Transfers to Stage 3 Assets Derecognised excl write offs	_ (1,578)		<u>-</u>	- - - - -	
Transfers to Stage 2 Transfers to Stage 3 Assets Derecognised excl write offs Impact on period end ECL of exposures	_ (1,578)		<u>-</u>	- - - - -	
Transfers to Stage 2 Transfers to Stage 3 Assets Derecognised excl write offs Impact on period end ECL of exposures transferred between stages during the	_ (1,578)	(174)	193 –	- - - - -	54 - - - -
Transfers to Stage 2 Transfers to Stage 3 Assets Derecognised excl write offs Impact on period end ECL of exposures transferred between stages during the period	_ (1,578)		193 - 1,987	- - - - -	54 - - - - 7,033
Transfers to Stage 2 Transfers to Stage 3 Assets Derecognised excl write offs Impact on period end ECL of exposures transferred between stages during the period Unwinding of discount	_ (1,578)	(174)	193 –	- - - - -	54 - - - -
Transfers to Stage 2 Transfers to Stage 3 Assets Derecognised excl write offs Impact on period end ECL of exposures transferred between stages during the period Unwinding of discount Changes due to modifications not	(1,578) (19) –	5,046 –	1,987 1,997	- - - - -	7,033 1,997
Transfers to Stage 2 Transfers to Stage 3 Assets Derecognised excl write offs Impact on period end ECL of exposures transferred between stages during the period Unwinding of discount Changes due to modifications not resulting in derecognition	_ (1,578)	(174)	1,987 1,997 (7)	- - - - - -	7,033 1,997
Transfers to Stage 2 Transfers to Stage 3 Assets Derecognised excl write offs Impact on period end ECL of exposures transferred between stages during the period Unwinding of discount Changes due to modifications not resulting in derecognition Recoveries	(1,578) (19) –	5,046 –	1,987 1,997 (7)	- - - - - -	7,033 1,997 (10)
Transfers to Stage 2 Transfers to Stage 3 Assets Derecognised excl write offs Impact on period end ECL of exposures transferred between stages during the period Unwinding of discount Changes due to modifications not resulting in derecognition Recoveries Amounts written off	(1,578) (19) - - (5) -	5,046 - 2 -	1,987 1,987 1,997 (7) 148 (4,125)	- - - - - - -	7,033 1,997 (10) 148 (4,125)
Transfers to Stage 2 Transfers to Stage 3 Assets Derecognised excl write offs Impact on period end ECL of exposures transferred between stages during the period Unwinding of discount Changes due to modifications not resulting in derecognition Recoveries	(1,578) (19) –	5,046 –	1,987 1,997 (7)	- - - - - - - -	7,033 1,997 (10)

7. Loans to customers (continued)

An analysis of changes in the gross carrying value and corresponding ECL in relation to loans to individuals during the year ended 31 December 2024 is as follows:

Loans to individuals at amortized cost, gross	Stage 1	Stage 2	Stage 3	Total
Gross carrying value as at 1 January 2024	30,112	1,780	2,446	34,338
New assets originated	12,611	_	_	12,611
Assets repaid or derecognised	(7,027)	(252)	(316)	(7,595)
Resegmentation	(1,764)	` _	(54)	(1,818)
Transfers to Stage 1	14	_	(14)	
Transfers to Stage 2	(48)	48	` _	_
Transfers to Stage 3	`	(4)	4	_
Unwinding of discount	_	_	15	15
Changes to contractual cash flows due to modifications				
not resulting in derecognition	(3)	_	_	(3)
Recoveries		_	31	31
Amounts written off	_	_	(128)	(128)
Foreign exchange and other movements	(708)	62	`(84 <u>)</u>	(730 <u>)</u>
At 31 December 2024	33,187	1,634	1,900	36,721
Loans to individuals at amortized cost, allowance				

Loans to	individuals	at amortized	cost,	allowance
fa., FOI				

for ECL	Stage 1	Stage 2	Stage 3	Total
ECL as at 1 January 2024	341	19	510	870
New assets originated	103	_	_	103
Assets repaid or derecognised	(48)	(2)	(50)	(100)
Resegmentation	(25)	_	(29)	(54)
Transfers to Stage 1	`	_	` _′	` _′
Transfers to Stage 2	(6)	6	_	_
Transfers to Stage 3		_	_	_
Impact on period end ECL of exposures transferred				
between stages during the period	_	18	1	19
Unwinding of discount	_	_	15	15
Changes due to modifications not resulting in				
derecognition	_	_	_	_
Recoveries	_	_	31	31
Amounts written off	_	_	(128)	(128)
Foreign exchange and other movements	(106)	3	<u> </u>	`(89)
At 31 December 2024	259	44	364	667

The contractual amount of written-off loans during the period that are still subject to enforcement actions as of year ended 2024, is approximately GEL 2,213.(as of year ended 2023: approximately GEL 31,158). These loans remain under active legal or collection procedures, and the company continues to pursue recovery.

An analysis of changes in the gross carrying value in relation to corporate lending during the year ended 31 December 2023 is as follows:

Corporate loans at amortized cost,

Stage 1	Stage 2	Stage 3	POCI	Total
560,805	41,210	164,322	27,890	794,227
336,404	_	_	_	336,404
(228,813)	(26,288)	(15,674)	(11,995)	(282,770)
32,243	(31,923)	(320)		` _
(42,004)	46,693	(4,689)	_	_
(7,223)	(4,283)	11,506	_	_
		1,886	_	1,886
323	121	34	_	478
_	_	2,526	_	2,526
_	_	(7,557)	(14,443)	(22,000)
19,987	505	(2,750)	(13)	17,729
671,722	26,035	149,284	1,439	848,480
	560,805 336,404 (228,813) 32,243 (42,004) (7,223) - 323 - 19,987	560,805 41,210 336,404 — (228,813) (26,288) 32,243 (31,923) (42,004) 46,693 (7,223) (4,283) — — 323 121 — — 19,987 505	560,805 41,210 164,322 336,404 - - (228,813) (26,288) (15,674) 32,243 (31,923) (320) (42,004) 46,693 (4,689) (7,223) (4,283) 11,506 - - 1,886 323 121 34 - - 2,526 - - (7,557) 19,987 505 (2,750)	560,805 41,210 164,322 27,890 336,404 - - - (228,813) (26,288) (15,674) (11,995) 32,243 (31,923) (320) - (42,004) 46,693 (4,689) - (7,223) (4,283) 11,506 - - - 1,886 - 323 121 34 - - - 2,526 - - - (7,557) (14,443) 19,987 505 (2,750) (13)

7. Loans to customers (continued)

Corporate loans at amortized cost, allowance for ECL	Stage 1	Stage 2	Stage 3	POCI	Total
ECL as at 1 January 2023	7,684	1,238	44,071	16,032	69,025
New assets originated or purchased	2,968	_	_	_	2,968
Assets repaid or derecognised	(1,310)	(161)	(5,349)	(1,577)	(8,397)
Transfers to Stage 1	854	(831)	(23)	_	
Transfers to Stage 2	(251)	`251 [′]	` _′	_	_
Transfers to Stage 3	(1,058)	(11)	1,069	_	_
Impact on period end ECL of exposures transferred between stages during the	, , ,	, ,	·		
period	(644)	388	4,987	_	4,731
Unwinding of discount	` _′	_	1,886	_	1,886
Changes due to modifications not			•		,
resulting in derecognition	2	4	10	_	16
Recoveries	_	_	2,526	_	2,526
Amounts written off	_	_	(7,557)	(14,443)	(22,000)
Foreign exchange and other movements	(3,762)	63	994	(5)	`(2,710)
At 31 December 2023	4,483	941	42,614	7	48,045

An analysis of changes in the gross carrying value and corresponding ECL in relation to loans to individuals during the year ended 31 December 2023 is as follows:

Stage 1	Stage 2	Stage 3	Total
16,940	1,581	3,010	21,531
25,137	_	_	25,137
(11,661)	(218)	(485)	(12,364)
86	(31)	(55)	_
(526)	526		_
_	(83)	83	_
_	· -	29	29
_	13	3	16
_	_	31	31
_	_	(378)	(378)
136	(8)	208	336
30,112	1,780	2,446	34,338
	16,940 25,137 (11,661) 86 (526) — — — — — — — — 136	16,940 1,581 25,137 - (11,661) (218) 86 (31) (526) 526 - (83) 136 (8)	16,940 1,581 3,010 25,137 — — (11,661) (218) (485) 86 (31) (55) (526) 526 — — (83) 83 — — 29 — 13 3 — — 31 — — (378) 136 (8) 208

for ECL	Stage 1	Stage 2	Stage 3	Total
ECL as at 1 January 2023	60	38	624	722
New assets originated	732	_	_	732
Assets repaid or derecognised	(120)	(6)	(135)	(261)
Transfers to Stage 1	` 3	(3)	` _′	`
Transfers to Stage 2	(5)	` 5	_	_
Transfers to Stage 3	<u>-</u>	(1)	1	_
Impact on period end ECL of exposures transferred				
between stages during the period	(3)	1	_	(2)
Unwinding of discount	<u> </u>	_	29	29
Changes due to modifications not resulting in				
derecognition	_	_	1	1
Recoveries	_	_	31	31
Amounts written off	_	_	(378)	(378)
Foreign exchange and other movements	(326)	(15)	337	` (4)
At 31 December 2023	341	19	510	870

Modified and restructured loans

The Group derecognises a financial asset, such as a loan to a customer, when the terms and conditions have been renegotiated to the extent that, substantially, it becomes a new loan. The newly recognised loans are classified as Stage 1 for ECL measurement purposes unless the new loan is deemed to be POCI.

If the modification does not result in cash flows that are substantially different, the modification does not result in derecognition. Based on the change in cash flows discounted at the original EIR, Group records a modification gain or loss, to the extent that an impairment loss has not already been recorded.

7. Loans to customers (continued)

Modified and restructured loans (continued)

The table below includes Stage 2 and 3 assets that were modified during the period, with the related modification gain/loss) incurred by the Bank.

<u> </u>	2024	2023
Loans modified during the period Amortised cost before modification Net modification gain/(loss)	53,657 (541)	14,106 170
Loans modified since initial recognition Gross carrying amount at 31 December of loans for which loss allowance has changed to 12-month measurement during the period Corresponding ECL		9,164 41

Collateral and other credit enhancements

The amount and type of collateral required depends on an assessment of the credit risk of the counterparty. Guidelines are implemented regarding the acceptability of types of collateral and valuation parameters. The types of collateral normally obtained are charges over real estate properties, also cash covers and guarantees, provided by borrowers or third parties.

Management monitors the market value of collateral, requests additional collateral in accordance with the underlying agreement, and monitors the market value of collateral obtained during its review of the adequacy of the allowance for loan impairment.

Cross sorriina

The following table provides the analysis of the loan portfolio by collateral types. For loans where various type of collateral is pledged, the most significant one is taken as a major type of collateral for the purpose of this allocation:

Type of collateral	Gross carrying amount at 31 December 2024	ECL as at 31 December 2024	Net carrying amount as at 31 December 2024
Loans collateralized by pledge of real estate	836,155	(29,730)	806,425
Loans collateralized by pledge of cash	99,677	(2)	99,675
Loans collateralized by pledge of equipment	81,154	(10,308)	70,846
Loans collateralized by pledge of Inventory	27,081	(1,129)	25,952
Other collateral	20,058	(154)	19,904
Unsecured loans	63,551	(18,194)	45,357
Total	1,127,676	(59,517)	1,068,159
	Gross carrying		Net carrying
	amount at	ECL as at	amount as at
Type of collateral	, ,		amount as at
	amount at	31 December 2023	amount as at 31 December 2023
Loans collateralized by pledge of real estate	amount at 31 December 2023	31 December 2023 (27,479)	amount as at
	amount at 31 December 2023 644,191	31 December 2023 (27,479) (28)	amount as at 31 December 2023 616,712
Loans collateralized by pledge of real estate Loans collateralized by pledge of cash Loans collateralized by pledge of equipment	amount at 31 December 2023 644,191 69,138	31 December 2023 (27,479)	amount as at 31 December 2023 616,712 69,110
Loans collateralized by pledge of real estate Loans collateralized by pledge of cash	amount at 31 December 2023 644,191 69,138 60,885	31 December 2023 (27,479) (28) (6,352)	amount as at 31 December 2023 616,712 69,110 54,533
Loans collateralized by pledge of real estate Loans collateralized by pledge of cash Loans collateralized by pledge of equipment Loans collateralized by pledge of Inventory	amount at 31 December 2023 644,191 69,138 60,885 49,267	31 December 2023 (27,479) (28) (6,352) (1,321)	amount as at 31 December 2023 616,712 69,110 54,533 47,946

According to Bank's ECL methodology all stage 3 loans have 100% probability of default, thus the ECL calculation is solely based on collateral value. ECL of POCI loans is based on borrower financials, overdue days, and collateral. Without the collateral, all stage 3 would be impaired by 100%, and POCI loans would be impaired by 69.99%, which would translate to GEL 101,313 additional ECL as at 31 December 2024 (31 December 2023: GEL 109,604).

Management estimates that the fair value of collateral at the inception of the loans is at least equal to the carrying amounts of corresponding secured loans.

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7. Loans to customers (continued)

Concentration of loans to customers

As at 31 December 2024, the Group had a concentration of loans due from 10 major groups of borrowers in the total exposure of GEL 530,908 that represented 47.17% of the total gross loan portfolio (31 December 2023: GEL 480,674 with 54.56% of the gross loan portfolio). An allowance of GEL 29,170 (31 December 2023: an allowance of GEL 33,140) was recognised against these loans.

Loans are made within Georgia in the following industry sectors:

	2024	2023
Manufacturing	310,231	253,614
Construction	189,544	143,292
Trade and Service	160,704	146,547
Real Estate Management	116,785	84,538
Energy/Petrolium related	59,945	17,108
Telecommunications	54,135	49,737
Health Care	51,749	31,281
HORECA	41,475	40,343
Agriculture	40,620	39,193
Individuals	36,721	34,338
Financial Institutions	20,057	2,845
Other	45,710	39,982
Total	1,127,676	882,818

8. Investment securities

Investment securities comprise:

	_	2024	2023
Debt securities at amortised cost			
Treasury notes of the Ministry of Finance of Georgia		21,943	21,951
Debt securities of corporations	_	39,244	34,149
		61,187	56,100
Less: allowance for impairment	_	(539)	(450)
Debt securities at amortised cost	=	60,648	55,650
Equity securities at FVOCI	% of ownership	2024	2023
Investment in OJSC United Clearing Center	6.25%	54	54
Investment in JSC GCSD	0.27%	3	3
Investment in JSC United Finance Corporation	0.47%	111	111
Equity securities at FVOCI	=	168	168
Debt securities at FVOCI		2024	2023
Treasury notes of the Ministry of Finance	_	7,101	7,079
Debt securities at FVOCI	=	7,101	7,079

As of 31 December 2024, allowances for impairment of treasury notes was (7) (2023: (18))

8. Investment securities (continued)

An analysis of changes in the gross carrying value and associated ECL in relation to debt securities at amortized cost is as follows:

	Treasury bills of the Ministry of Finance of Georgia	Treasury notes of the Ministry of Finance of Georgia	Debt securities of corporations	Total
Gross carrying value as at				
1 January 2024 New assets originated	_	21,951 _	34,149 5,000	56,100 5,000
Foreign exchange and other			0,000	3,000
movements		(8)	95	87
At 31 December 2024		21,943	39,244	61,187
	Treasury bills of the Ministry of Finance of Georgia	Treasury notes of the Ministry of Finance of Georgia	Debt securities of corporations	Total
ECL oc at 1 January 2024	_	74	394	468
ECL as at 1 January 2024 New assets originated		/4 -	394 100	100
Foreign exchange and other				
movements		(13)	(9)	(22)
At 31 December 2024		61	485	546
	Treasury bills of the Ministry of Finance of Georgia	Treasury notes of the Ministry of Finance of Georgia	Debt securities of corporations	Total
Gross carrying value as at			•	
1 January 2023 New assets originated	-	21,943	8,073 26,000	30,016
Foreign exchange and other	_	_	26,000	26,000
movements		8	76	84
At 31 December 2023		21,951	34,149	56,100
	Treasury bills of the Ministry of Finance of Georgia	Treasury notes of the Ministry of Finance of Georgia	Debt securities of corporations	Total
ECL as at 1 January 2023		58	37	95
New assets originated	_	-	229	229
Foreign exchange and other movements	_	16	128	144
		74	394	468
At 31 December 2023				700

All balances of investment securities that are held at amortized cost are allocated to Stage 1.

Changes in carrying value of debt securities at fair value through other comprehensive income during 2024 consists of increase in fair value amounted to GEL 10 and changes in carrying value of debt securities at fair value through other comprehensive income during 2023 consists of increase in fair value amounted to GEL 12.

9. Property and equipment

The movements in property and equipment were as follows:

	Buildings		Computers	Leasehold		
	and other	Furniture	and		Construction	
<u>-</u>	real estate	and fixtures	equipment	and other	in progress	Total
Cost						
1 January 2023	9,905	6,262	9.749	1,836	724	28,476
Additions	_	126	1,502	120	718	2,466
Transfer	_	451	13	9	(473)	· –
Disposals and write-offs		(904)	(457)	(75)	(8)	(1,444)
31 December 2023	9,905	5,935	10,807	1,890	961	29,498
Additions	_	90	347	26	1,699	2,162
Reclassifications	_	69	(69)	_	_	_
Transfer	_	622	17	1,216	(1,855)	_
Disposals and write-offs	(234)	(306)	(794)		(65)	(1,399)
31 December 2024	9,671	6,410	10,308	3,132	740	30,261
Accumulated depreciation						
1 January 2023	2,702	4,951	7,139	967	_	15,759
Depreciation charge	251	315	536	163	_	1,265
Disposals and write-offs		(904)	(457)	(53)		(1,414)
31 December 2023	2,953	4,362	7,218	1,077	_	15,610
Depreciation charge	252	350	860	164	_	1,626
Transfers	_	69	(69)	_	_	_
Disposals and write-offs		(306)	(794)			(1,100)
31 December 2024	3,205	4,475	7,215	1,241		16,136
Net book value						
1 January 2023	7,203	1,311	2,610	869	724	12,717
31 December 2023	6,952	1,573	3,589	813	961	13,888
31 December 2024	6,466	1,935	3,093	1,891	740	14,125

As at 31 December 2024 fully depreciated items amounted to GEL 8,411 (31 December 2023: GEL 8,733).

10. Leases

The movement in right-of-use assets and lease liabilities were as follows:

	Right of use assets – Buildings	Lease liabilities
As at 1 January 2024 Additions Depreciation expense Interest expense Payments	7,160 2,812 (1,743) — —	7,167 2,812 - 634 (2,125)
As at 31 December 2024	8,229	8,488
	Right of use assets – Buildings	Lease liabilities
As at 1 January 2023 Additions Depreciation expense Interest expense Payments	1,518 7,190 (1,548) — —	1,801 7,190 - 101 (1,925)
As at 31 December 2023	7,160	7,167

The Group recognized rent expense of 240 GEL from short–term and low value operating leases for the period ended 31 December 2024 (2023: GEL 206). Total lease payment for the reporting period is GEL 2,365 (2023: GEL 2,131).

11. Intangible assets

The movements in intangible assets were as follows:

	Licenses	Computer software	Total
Cost 1 January 2023 Additions Disposals and write offs 31 December 2023	6,635	2,947	9,582
	715	4,121	4,836
	(365)	(340)	(705)
	6,985	6,728	13,713
Additions Disposals and write offs 31 December 2024	913	2,149	3,062
	(33)	(115)	(148)
	7,865	8,762	16,627
Accumulated amortization 1 January 2023 Amortisation charge Disposals and write offs 31 December 2023	2,185 1,117 (365) 2,937	1,950 154 (340) 1,764	4,135 1,271 (705) 4,701
Amortisation charge Disposals and write offs 31 December 2024	1,320	348	1,668
	(33)	(115)	(148)
	4,224	1,997	6,221
Net book value 1 January 2023 31 December 2023	4,450	997	5,447
	4,048	4,964	9,012
31 December 2024	3,641	6,765	10,406

12. Other assets and liabilities

Other assets comprise:

	31 December 2024	31 December 2023
Other non-financial assets		
Repossessed assets	46,623	91,004
Prepaid taxes other than income tax	721	625
Advances paid	660	1,111
Inventory	84	85
Other	324	262
	48,412	93,087
Other financial assets		
Accounts receivable	732	1,245
Claims for guarantees paid	-	_
Other Receivables	13	20
Less: allowance for impairment of other assets	(148)	(273)
·	597	992
Total other assets	49,009	94,079

12. Other assets and liabilities (continued)

An analysis of changes in the ECLs for stage 3 other financial assets for the year ended 31 December 2024 and 2023 is as follows:

	Stage 1	Stage 2	Stage 3	Allowance for impairment of other assets
ECL at 1 January 2023	40	_	735	775
ECL charge	7	_	1,137	1,144
Payments	(45)	_	(675)	(720)
Write-offs	-	_	(926)	(926)
At 31 December 2023	2		271	273
ECL charge	5	13	102	120
Payments	(6)	(13)	(186)	(205)
Write-offs			(40)	(40)
At 31 December 2024	1		147	148

An analysis of changes in the carrying value of repossessed assets for the year ended 31 December 2024 and 2023:

	2024	2023
Carrying value at the beginning of the year	91,004	91,640
Repossession	10,172	20,637
Assets sold	(55,924)	(32,559)
Gain on assets recovery (Note 20)		9,074
Improvements	_	2,222
Reversal/(Impairment)	1,371	(10)
Carrying value at the end of the year	46,623	91,004

Repossessed assets as at 31 December 2024 include land and buildings in amount of GEL 44,068 (31 December 2023: GEL 88,938) and movable properties in amounts of GEL 2,556 (31 December 2023: GEL 2,066), which are measured at the lower of its carrying amount and fair value less cost to sell. Gain on sale of repossessed assets during 2024 was GEL 11,612 (2023: GEL 1,826) (Note 20).

During the 2024, a reversal was made concerning the value of repossessed assets due to the recognition of losses from previous years.

Other liabilities comprise:

	31 December 2024	31 December 2023
Other financial liabilities		
Accounts payable	5,476	10,955
, ,	5,476	10,955
Other non-financial liabilities		
Taxes other than income tax	770	3,345
Other	772	1,525
	1,542	4,870
Total other liabilities	7,018	15,825

13. Amounts due to customers

The amounts due to customers include the following:

	2024	2023
Current and demand accounts	635,146	688,133
Time deposits (including certificates of deposit)	825,716	874,328
Amounts due to customers	1,460,862	1,562,461

Original

contractual

Carrying value

ac at

81,058

(thousands of Georgian lari)

13. Amounts due to customers (continued)

As at 31 December 2024, amounts due to customers included balances with ten largest customers of GEL 733,239 that constituted 50% of the total of customer accounts (31 December 2023: GEL 847,015 that constituted 54% of the total of customer accounts).

An analysis of customer accounts by economic sector follows:

	2024	2023
Individuals	729,612	675,165
Trade and service	543,980	674,802
Government Services	46,850	49,157
Construction	28,341	59,305
Manufacturing	16,199	4,147
Transport and communication	2,223	2,348
Agriculture	2,640	271
Other	91,017	97,266
Amounts due to customers	1,460,862	1,562,461

As at 31 December 2024 deposits by customers included balances classified in Trade and service and individual sectors amounting to GEL 192,583 (31 December 2023: GEL 184,822), that were frozen on the basis of a court decision dated 11 September 2015.

14. Subordinated debt

All Subordinated loans are obtained from related parties and consist of the following:

Facility provider	Commencement date	Maturity date	Interest rate	Currency	value in Original CCY	as at 31 December 2024
Fin Service XXI Fin Service XXI Fin Service XXI Cartu Group Inter Consulting Plus	31–Mar–11 9–Oct–20 19–Apr–21 24–Jun–19 17–Oct–05	31–Mar–28 Perpetual Perpetual Perpetual 17–Oct–27	5.50% 5.50% 5.50% 5.50% 5.50%	USD USD USD USD USD	5,000 10,000 10,000 7,000 7,000	14,034 12,142 20,149 19,665 19,648
						85,638
Facility provider	Commencement date	Maturity date	Interest rate	Currency	Original contractual value in Original CCY	Carrying value as at 31 December 2023

In the event of bankruptcy or liquidation of the Group, repayment of these debts is subordinate to the repayments of the Group's liabilities to all other creditors.

All subordinated debts are convertible to common equity. If the coefficient of common Tier 1 capital (CET1) falls below the trigger level, which is the greater of the regulatory requirement of CET1 and 5.125% of CET1, perpetual subordinated debts are converted into common equity. For long-term subordinated debts, the Group holds the option to convert the debt into common shares at their nominal value. However, the Group also retains the right to fully repay the subordinated debt instead of opting for the conversion into common equity.

14. Subordinated debt (continued)

The table below details changes in the Group's subordinated debts arising from financing activities. Liabilities arising from financing activities are those for which cash flows were, or future cash flows will be, classified in the Group's consolidated statement of cash flows as cash flows from financing activities.

_	1 January 2024	Interest accrual during 2024	Interest paid during 2024	Foreign exchange gain during 2024	31 December 2024
Subordinated debt	81,058	5,852	(5,851)	4,579	85,638

The table below details changes in the Group's subordinated debts arising from financing activities during 2023:

_	1 January 2023	Interest accrual during 2023	Interest paid during 2023	Foreign exchange gain during 2023	31 December 2023	
Subordinated debt	81,550	5,637	(5,637)	(492)	81,058	_

The principal value of the subordinated loan qualified for the inclusion in the Tier 2 capital under the Basel III requirements, was GEL 16,279 under IFRS 9 (31 December 2023: GEL 22,053). The principal value of the subordinated loan qualified for the inclusion in the additional Tier 1 capital under the Basel III requirements, was GEL 51,938 under IFRS 9 (31 December 2023: GEL 48,768).

15. Taxation

The corporate income tax expense for the years ended 31 December 2024 and 2023 comprised:

	2024	2023
Current tax expense	8,326	18,043
Deferred tax expense/(benefit)	291	(7,152)
Income tax expense	8,617	10,891

In 2024 the income tax rate applicable to the Bank's income is 20% (2023: 20%). The effective income tax rate differs from the statutory income tax rate. A reconciliation of the income tax expense on statutory rates with actual is as follows:

	2024	2023
Profit before income tax Statutory tax rate	44,969 20%	46,557 20%
Theoretical income tax expense at the statutory rate	8,994	9,311
Tax exempt income	(1,181)	(527)
Non-deductible expenses	804	921
Effect from change in tax legislation	_	1,186
Other		
Income tax expense	8,617	10,891

Deferred tax liabilities and assets as at 31 December 2024 and 31 December 2023 and their movements for the respective period.

	31 December 2022	Through profit or loss	31 December 2023	Through profit and loss	31 December 2024
Tax effect of temporary differences					
Lease liabilities	320	997	1,317	282	1,599
Provisions	_	_	_	_	· -
Loans to customers	(9,098)	9,098	-	-	-
Amounts due from credit institutions	91	(99)	(8)	55	47
Investment securities	(21)	· -	(21)	_	(21)
Amounts due to credit Institutions	(27)	_	(27)	_	(27)
Amounts due to customers	540	(656)	(116)	116	· -
Other Liabilities	(583)	440	(143)	143	_
Intangible assets	(24)	(144)	(168)	(100)	(268)
Other Assets	1,215	(1,680)	(465)	427	(38)
Property and Equipment	(1,428)	238	(1,190)	(977)	(2,167)
Right of use assets	(274)	(1,042)	(1,316)	(237)	(1,554)
Deferred tax (liability)/asset	(9,289)	7,152	(2,137)	(291)	(2,429)

15. Taxation (continued)

The Group does not recognize deferred tax liability in relation to temporary differences associated with investments in subsidiaries as the Group does not expect reversal of these differences for the foreseeable future. Aggregate taxable temporary difference associated with investments in subsidiaries in respect of which no deferred tax liability was recognized is GEL 5,070 as at 31 December 2024 (2023: GEL 4,434).

16. Equity

As at 31 December 2024 and 2023, authorized, issued and fully paid capital amounted to GEL 114,430 comprising of 114,430,000 common shares with nominal value of GEL 1 each. Each share entitles one vote to the shareholder.

In 2024 and 2023 the Group has not declared or paid any dividends.

As at 31 December 2024 The Group's retained earnings and other reserves includes GEL 53 fair value changes in investment securities (31 December 2023: GEL 43).

Additional paid-in capital represents the difference between a fair value and a nominal amount at initial recognition, and modification, which were deemed non-substantial, of the subordinated loans received from the Parent and entities under common control. The Group transfers the portion of additional paid-in capital associated with the extinguished subordinated debts.

During 2024 the Bank has transferred a portion of its Additional Paid–in–Capital (APIC) GEL 1,918 to retained earnings, following the repayment of corresponding subordinated debt in prior years.

17. Commitments and contingencies

As at 31 December 2024 and 2023, the Group's commitments and contingencies comprised the following:

2024	2023
42,350	25,026
157,000	139,253
199,350	164,279
(620)	(265)
198,730	164,014
	42,350 157,000 199,350 (620)

An analysis of changes in the ECL allowances during the year ended 31 December 2024 is as follows:

Undrawn loan commitments	Stage 1	Stage 2	Stage 3	Total
ECLs as at 1 January 2024	193	(1)	4	196
New exposures	4,553	70	_	4,623
Amounts paid	(4,417)	(40)	(1)	(4,458)
Foreign exchange adjustments	61		(1)	60
At 31 December 2024	390	29	2	421

An analysis of changesin the ECLs during the year ended 31 December 2023 is as follows:

Undrawn loan commitments	Stage 1	Stage 2	Stage 3	Total
ECLs as at 1 January 2023	113	2	10	125
New exposures	548	3	1	552
Amounts paid	(439)	(5)	(18)	(462)
Foreign exchange adjustments	(29)	(1)	11	(19)
At 31 December 2023	193	(1)	4	196

18. Credit loss expense and other impairment and provisions

The table below shows the ECL charges/(reversals) on financial instruments recorded in the profit or loss for the year ended 31 December 2024:

_	Notes	Stage 1	Stage 2	Stage 3	POCI	Total
Cash and cash equivalents Amounts due from credit institutions Loans to customers Debt securities measured at amortised cost	6 7 8 9	12 13 1,315 89	- 9,625 -	- - 1,725 -	- (1) -	12 13 12,664 89
Debt securities measured at FVOCI Credit loss charge/(reversal) on interest bearing assets	9	1,418	9,625	1,725		12,767
Other financial assets Guarantees Undrawn loan commitments	13 18 18	134 197	- - 30	- (4) (2)	(85) _ _	(85) 130 225
Charge/(reversal) of other impairment and provisions excluding repossessed assets		331	30	(6)	(85)	270
Impairment of repossessed assets	13					(1,371)
Other impairment and provisions						(1,101)

The table below shows the ECL charges on financial instruments recorded in the consolidated statement of profit or loss for the year ended 31 December 2023:

_	Notes	Stage 1	Stage 2	Stage 3	POCI	Total
Cash and cash equivalents	6	(16)	_	_	_	(16)
Amounts due from credit institutions	7	8	_	-	_	8
Loans to customers	8	(2,915)	(318)	1,889	(1,582)	(2,926)
Debt securities measured at amortised cost	9	355	_	_	_	355
Debt securities measured at FVOCI	9	18				18
Credit loss charge/(reversal) on interest bearing assets		(2,550)	(318)	1,889	(1,582)	(2,561)
Other financial assets	13	_	_	_	424	424
Guarantees	19	(6)	(1)	_	_	(7)
Undrawn loan commitments	19	79	(2)	(6)	-	71
Charge/(reversal) of other impairment and provisions excluding repossessed		73	(2)	(6)	424	400
assets			(3)	(6)	424	488
Impairment of repossessed assets	13					10
Other impairment and provisions						498

19. Fee and commission income and expense

Fee and commission income and expense comprise:

<u>-</u>	2024	2023
Guarantees and letters of credits issued	4,012	1,955
Plastic card operations	3,065	3,046
Settlement operations	1,392	1,150
Cash operations	481	500
Documentary operations	56	48
Other	151	965
Fee and commission income	9,157	7,664
Plastic card operations	(4,644)	(4,708)
Documentary operations	(4)	_
Settlement operations	(520)	(396)
Other	(102)	(119)
Fee and commission expense	(5,270)	(5,223)

The Group's revenue from contracts with customers is mostly represented by fee and commission income. As at 31 December 2024 the Group recognized contract assets related to guarantees with amount of GEL 212 (31 December 2023: GEL 219), which is included in other financial assets (Note 12).

20. Other income, net

Other income/(expenses), net comprise:

	Note	2024	2023
Net gain on disposal of repossessed assets	12	11,612	1,826
Gain on disposal of property		1,131	_
Income from operating lease		171	1,085
Fines and penalties received		14	8
Other (a)	<u> </u>	236	9,459
Total other income, net		13,164	12,378

In 2022 the Tbilisi City Court ruled on a lawsuit brought by Cartu Bank against several state-owned entities, including the Ministry of Justice, the National Enforcement Bureau, the Ministry of Economy, and the Revenue Service. The court ordered the defendants to jointly pay USD 9,428 thousands (approx. GEL 25,428).

This legal case stemmed from the criminal proceedings, so called Cartu Bank's bankruptcy case. In these proceedings certain individuals were convicted by the decision of court in 2019. The verdict also highlighted the involvement of the deputy minister of economy and the head of the revenue service in the bank's bankruptcy crime, alongside the convicted individuals.

The judgment determined that with the intention of causing financial distress to the bank, fictitious tax debts were documented in the tax records by the certain borrowers of the Bank. This action led to the seizure of the mortgaged property under the loan agreements which were subsequently transferred to state ownership through execution. Consequently, the bank's mortgages was annulled. As a consequence of the client's failure to repay the bank's debt, the bank incurred damages equivalent to the value of the collaterals – the mortgaged assets, amounting to USD 9,428 thousands (approx. GEL 25,428). This sum was mandated by the court to be paid by the relevant state authorities.

To settle the dispute, Bank Cartu and the National State Property Agency reached an agreement wherein the bank received state—owned real estate in the Vake district of Tbilisi, comprising 58 cadastral units, at a nominal price of 1 GEL. In 2023 the Group recognized gain from asset recovery of GEL 9,074 as the result of this settlement, (Note 12) To fulfil its privatization obligation, the bank opted to reject two significant legal actions. Firstly, it declined the USD 9,428 thousands claim imposed by the court of first instance. Secondly, it withdrew from an ongoing dispute involving "Logos" LLC, a state—owned company, which was being heard in the Tbilisi Court of Appeal. In this dispute, the request was made for the recognition and enforcement of the arbitration decision dated December 24, 2010, against LLC "Logos" (as a result of the cancelled mortgages stemming from the aforementioned crime, the case had no prospect of recovering credit debt in favour of the Bank).

21. Personnel and other operating expenses

Personnel and other operating expenses comprise:

	2024	2023
Salaries	22,165	19,143
Bonuses and other employee benefits	3,669	2,216
Personnel expenses	25,834	21,359
Communication	6,982	5,397
Charity Costs*	5,050	9,723
Transportation and business trip expenses	1,462	879
Taxes other than income tax	1,297	1,389
Security Expenses	1,234	1,255
Professional services	719	813
Maintenance and exploitation	668	651
Utilities	468	504
Office supplies	265	314
Deposit insurance fee	302	212
Operating leases	240	208
Membership Fees	128	131
Insurance	125	124
Personnel Training	132	63
Advertising costs	24	19
Other Expenses	1,555	1,738
Other operating expenses	20,651	23,420

During 2024 The Bank paid GEL 4,800 to the International charity fund Cartu (2023: GEL 9,500) (Note 25).

21. Personnel and other operating expenses (continued)

The average number of the Bank's employees during 2024 was 367, including average 8 top management employees, average 39 middle management employees, and average 320 other full-time employees.and average temporary employees were 15 during 2024. (2023: average number of employees was 338, including average 7 top management employees, average 40 middle management employees, and average 291 other full-time employees, average temporary employees were 14)

Remuneration of the Group's auditor for the years ended 31 December 2024 and 2023 comprises (net of VAT):

	2024	2023
Fees for the audit of the Group's annual financial statements for the year		
ended 31 December	335	317
Expenditures for other professional service	104	
Total fees and expenditures	439	317

Fees and expenditures payable to other auditors and audit firms in respect of other professional services comprised GEL 29 (2023: GEL 257).

22. Risk management

Introduction

Risk is inherent in the Group's activities but it is managed through a process of ongoing identification, measurement and monitoring, subject to risk limits and other controls. This process of risk management is critical to the Group's continuing profitability and each individual within the Group is accountable for the risk exposures relating to his or her responsibilities. The Group is exposed to credit risk, liquidity risk and market risk. It is also subject to operating risks.

The independent risk control process does not include business risks such as changes in the environment, technology and industry. They are monitored through the Group's strategic planning process.

Risk management structure

Supervisory Board

Supervisory Board defines Group's risk appetite in cooperation with CRO and other members of Board of Directors. Board is responsible for the existence of the effective risk management, monitoring and internal controls within Group that corresponds to the risk appetite statement, policies and limits. Along with other functions, the Supervisory board members, together and individually, are responsible for maintaining strong risk culture that is necessary for business continuity within organization.

Risk Committee

Risk committee is responsible for reviewing effectiveness of risk strategies as on aggregate level, so on individual level, evaluates compliance with risk appetite and give recommendations to Supervisory Board. This committee also reviews all risk management related policies. Risk committee is comprised of three members, out of which two are independent.

Board of Directors

The Board of Directors is responsible for the implementing and maintaining of risk strategies and corresponding risk management processes. The Board of Directors is ultimately responsible for identifying and controlling risks and different departments and committees which are responsible for managing and monitoring risks.

Risk management

The Risk Management Department is responsible for implementing and maintaining risk management framework.

Asset and Liability Committee

Asset and Liability Committee (ALCO) is responsible for managing the Group's assets and liabilities and the overall financial structure. It is also primarily responsible for the funding, liquidity, interest rate, and capital adequacy risks of the Group.

22. Risk management (continued)

Risk management structure (continued)

Internal Audit

Risk management processes throughout the Group are audited by the internal audit function on a constant basis, which examines the adequacy of the procedures, their design and operational effectiveness, and the Group's compliance both with the regulatory requirements and internal procedures. Internal Audit discusses the results of all assessments with management, and reports its findings and recommendations to the Audit Committee.

Audit Committee

The Audit Committee is responsible for the fundamental risk issues and manages and monitors relevant risk decisions and performance of control functions by other departments in the Group pertaining to general control environment, manual, IT dependent or application controls, intentional or unintentional misstatement risks, risk of fraud or misappropriation of assets, information security, anti-money laundering, etc. Audit committee is comprised of three members, out of which two are independent.

Risk measurement and reporting systems

Risk monitoring and controlling is primarily performed based on limits established by the Group. These limits reflect the business strategy and market environment of the Group as well as the level of risk that the Group is willing to accept. In addition the Group monitors and measures the overall risk bearing capacity in relation to the aggregate risk exposure across all risk types and activities. The main body to which the risks are reported is a risk committee. The respective meetings are held once per quarter.

Credit risk

Credit risk is the risk that the Group will incur a loss because its borrowers or counterparties will fail to fulfil their contractual obligations. The Group manages and controls credit risk by setting limits on the amount of risk it is willing to accept for individual counterparties and by monitoring exposures in relation to such limits.

The Group has established a credit quality review process to provide early identification of possible changes in the creditworthiness of counterparties, including regular collateral revisions. The credit quality review process allows the Group to assess the potential loss as a result of the risks to which it is exposed and take corrective action.

Actual exposure per borrower against limits is monitored on loans granted. The Credit Committee may initiate a change in the limits. Where appropriate, the Group obtains collateral and corporate guarantees. The credit risks are monitored on a continuous basis and are subject to annual or more frequent reviews.

Credit-related commitments risks

The Group makes available to its customers guarantees which may require that the Group make payments on their behalf. Such payments are collected from customers based on the terms of guarantee. They expose the Group to similar risks to loans and these are mitigated by the same control processes and policies.

Impairment assessment

EAD

The Group calculates ECL based on several probability-weighted scenarios to measure the expected cash shortfalls, discounted at an approximation to the EIR. A cash shortfall is the difference between the cash flows that are due to the Group in accordance with the contract and the cash flows that the entity expects to receive. The mechanics of the ECL calculations are outlined below and the key elements are as follows:

The *Probability of Default* is an estimate of the likelihood of default over a given time horizon. A default may only happen at a certain time over the assessed period, if the facility has not been previously derecognised and is still in the portfolio.

The *Exposure at Default* is an estimate of the exposure at a future default date, taking into account expected changes in the exposure after the reporting date, including repayments of principal and

expected changes in the exposure after the reporting date, including repayments of principal and interest, whether scheduled by contract or otherwise, expected drawdowns on committed facilities, and accrued interest from missed payments.

The Loss Given Default is an estimate of the loss arising in the case where a default occurs at a given time. It is based on the difference between the contractual cash flows due and those that the lender would expect to receive, including from the realisation of any collateral. It is usually expressed as a

LGD percentage of the EAD.

22. Risk management (continued)

Credit risk (continued)

The ECL allowance is based on the 12 months' expected credit loss (12mECL), unless there has been significant increase in credit risk since origination or other impairment indicators were identified, in which case the ECL allowance is based on the credit losses expected to arise over the life of the asset (the lifetime expected credit loss or LTECL). The 12mECL is the portion of LTECL that represent the ECLs that result from default events on a financial instrument that are possible within the 12 months after the reporting date. Both LTECL and 12mECL are calculated on either an individual basis or a collective basis, depending on the nature of the underlying portfolio of financial instruments.

The Group has established a policy to perform an assessment, at the end of each reporting period, of whether a financial instrument's credit risk has increased significantly since initial recognition, by considering the change in the risk of default occurring over the remaining life of the financial instrument. Based on the above process, the Group groups its loans into Stage 1, Stage 2, Stage 3 and POCI, as described below:

When loans are first recognised, the Group recognises an allowance based on 12mECL. Stage 1 loans

also include facilities where the credit risk has improved and the loan has been reclassified from

Stage 1: Stage 2.

When a loan has shown a significant increase in credit risk since origination, the Group records an allowance for the LTECL. Stage 2 loans also include facilities, where the credit risk has improved and

Stage 2: the loan has been reclassified from Stage 3.

Stage 3: Loans considered credit-impaired. The Group records an allowance for the LTECL.

Purchased or originated credit impaired (POCI) assets are financial assets that are credit impaired on initial recognition. POCI assets are recorded at fair value at original recognition and interest revenue is subsequently recognised based on a credit-adjusted EIR. ECL are only recognised or released to the

extent that there is a subsequent change in the lifetime expected credit losses.

Definition of default and cure

The Group considers a financial instrument defaulted and therefore Stage 3 (credit-impaired) for ECL calculations in all cases when the borrower becomes 90 days past due on its contractual payments or credit risk score of the borrower increases to the "high risk" category according to the internal credit risk assessment methodology. The Group considers amounts due from Banks defaulted and takes immediate action when the required intraday payments are not settled by the close of business as outlined in the individual agreements.

As a part of a qualitative assessment of whether a customer is in default, the Group also considers a variety of instances that may indicate unlikeliness to pay. When such events occur, the Group carefully considers whether the event should result in treating the customer as defaulted and therefore assessed as Stage 3 for ECL calculations or whether Stage 2 is appropriate.

The Group has defined certain criteria which should be met in order to consider asset as cured. The decision whether to classify an asset as Stage 2 or Stage 1 once cured depends on the updated credit grade, at the time of the cure, and whether this indicates there has been a significant increase in credit risk compared to initial recognition.

PD model

POCI:

To determine the PD rates for each group, the Group utilizes migration matrices based on "Markov chain" model. At the beginning of analysing 12–month period borrowers in each pool are grouped in 11 buckets by overdue days and classification based on former NBG asset classification rule. The analysis is conducted on every 12–month period from December 2014 to the reporting date. The final PD used in the model represents the weighted average of the historical 12–month period PDs.

The Group has assessed the impact of the forward–looking information into collective assessment model as not material, thus, the results were not incorporated in ECLs.

As at 31 December 2024, 10% increase in average PD per each pool results in total ECL increase by 2.29% that represents GEL 1,316 and 10% decrease in average PD per each pool results in total ECL decrease by 3.16% that represents GEL 1,814 (31 December 2023: 10% increase in average PD per each pool results in total ECL increase by 0.77% that represents GEL 377 and 10% decrease in average PD per each pool results in total ECL decrease by 1.86% that represents GEL 909).

LGD model

Another component of impairment model is LGD (loss given default), that is an estimate of the loss arising on default. To measure it, defaulted exposures by segments is reduced by deposits pledged and the discounted liquidation value of properties pledged using 2.5 years of time to collect period and valuation haircut. Impact of LGD is very material and ECL of the Group is heavily depended on the value of collateral.

22. Risk management (continued)

Credit risk (continued)

As at 31 December 2024, 10% increase in valuation haircut results in ECL increase by 2.22% that represents GEL 1,276 and 10% decrease in valuation haircut results in ECL decrease by 2.1% that represents GEL 1,210 (31 December 2023: 10% increase in valuation haircut results in ECL increase by 3.91% that represents GEL 1,914 and 10% decrease in valuation haircut results in ECL decrease by 3.57% that represents GEL 1,744).

As at 31 December 2024, 10% (three month) increase in time to collect period results in ECL increase by 3.44% that represents GEL 1,978 and 10% (three month) decrease in time to collect period results in ECL decrease by 3.29% that represents GEL 1,892 (31 December 2023: 10% (three month) increase in time to collect period results in ECL increase by 7.58% that represents GEL 3,707 and 10% (three month) decrease in time to collect period results in ECL decrease by 5.99% that represents GEL 2,932).

EAD model

The exposure at default (EAD) represents the gross carrying amount of the financial instruments subject to the impairment calculation, addressing both the client's ability to increase its exposure while approaching default and potential early repayments too. For Stage 1, Stage 3, and POCI financial assets, the current outstanding amount is used as the Exposure at Default (EAD). For Stage 2 financial assets, the EAD is calculated over the lifetime of the instruments, taking into account expected future payments.

Significant increase in credit risk

The Group continuously monitors all assets subject to ECLs. In order to determine whether an instrument or a portfolio of instruments is subject to 12mECL or LTECL, the Group assesses whether there has been a significant increase in credit risk since initial recognition.

The Group also applies a secondary qualitative method for triggering a significant increase in credit risk for an asset, such as moving a customer/facility to the watch list, or the account becoming restructured due to credit event. Regardless of the change in credit grades, if contractual payments are more than 30 days past due, the credit risk is deemed to have increased significantly since initial recognition.

When estimating ECLs on a collective basis for a group of similar assets, the Group applies the same principles for assessing whether there has been a significant increase in credit risk since initial recognition.

Treasury and interbank relationships, investment securities measured at amortized cost

The Group's treasury and interbank relationships and counterparties comprise financial services institutions, banks. For these relationships, the Bank's risk management department analyses publicly available information such as financial information and other external data, e.g., the external ratings assigned by international rating agencies. The Group's investment securities measured at amortized cost include T-bills, T-Notes, and corporate bonds. The T-bills and T-notes are issued by the Ministry of Finance of Georgia, thus credit rating of the country is used in estimation of the ECLs for these instruments The ECL estimation for corporate bonds is based on the assigned credit ratings by international credit agencies.

Corporate lending

For corporate loans, the borrowers are assessed by specialised credit risk employees of the Group. The credit risk assessment takes into account various historical, current and forward-looking information such as:

- Historical financial information together with forecasts and budgets prepared by the client. This financial information includes realised and expected results, solvency ratios, liquidity ratios and any other relevant ratios to measure the client's financial performance. Some of these indicators are captured in covenants with the clients and are, therefore, measured with greater attention;
- Any publicly available information on the clients from external parties. This includes external rating grades issued by rating agencies, independent analyst reports, publicly traded bond prices or press releases and articles:
- Any macro-economic or geopolitical information, e.g., GDP growth relevant for the specific industry and geographical segments where the client operates;
- Any other objectively supportable information on the quality and abilities of the client's management relevant for the company's performance.

22. Risk management (continued)

Credit risk (continued)

Retail lending

For retail loans, the borrowers are assessed by specialised credit risk employees of the Group. The credit risk assessment takes into account various historical, current and forward–looking information such as:

- Historical financial information together with forecasted monthly cash flows. This financial information includes realised and expected results, and any other relevant ratios (i.e. PTI, LGD) to measure the client's financial performance;
- Any publicly available information on the clients from external parties;
- Any other objectively supportable information on the abilities of the client to generate future cash flows.

Grouping financial assets measured on a collective basis

Dependent on the factors below, the Group calculates ECLs either on a collective or on an individual basis.

Asset classes where the Group calculates ECL on an individual basis include stage 1 exposures that exceeds 1% of Tier 1 capital, and stage 2, stage 3 and POCI exposures that exceeds 0.5% of Tier 1 capital.

The Bank calculates ECL on a collective basis for all asset classes. For assets that have already been individually assessed, a comparison is made between the collective and individual approaches, and the higher of the two Expected Credit Loss (ECL) amounts is recognized.

The Group groups these exposures into smaller homogeneous portfolios, based on a combination of internal and external characteristics of the loans, for example overdue bucket, product type, or borrower's industry.

Excessive risk concentration

Concentrations arise when a number of counterparties are engaged in similar business activities, or activities in the same geographic region, or have similar economic features that would cause their ability to meet contractual obligations to be similarly affected by changes in economic, political or other conditions. Concentrations indicate the relative sensitivity of the Group's performance to developments affecting a particular industry or geographical location. The group employs a rigorous methodology to evaluate the concentration of the largest borrowers, taking into account both the specific group and industry in which they operate.

Forward-looking information and multiple economic scenarios

In its ECL models, the Group relies on a range of forward looking information as economic inputs, such as:

- ▶ GDP growth;
- Inflation rate;
- GEL/USD foreign exchange rate change.

The inputs and models used for calculating ECLs may not always capture all characteristics of the market at the date of the consolidated financial statements. To reflect this, qualitative adjustments or overlays are occasionally made as temporary adjustments when such differences are significantly material.

The Group obtains the forward–looking information from the sources published by the NBG and GeoStat. The tables show the values of the key forward looking economic variables/assumptions used in each of the economic scenarios for the ECL calculations. The figures for "Subsequent years" represent a long–term average and so are the same for each scenario as at 31 December 2026.

		Assigned obabilities,				Subsequent
Key drivers	ECL scenario	%	2025	2026	2027	years
GDP growth, %						
5 ,	Upside	25%	7.00%	6.00%	6.00%	6.00%
	Base case	50%	4.90%	5.80%	5.70%	5.70%
	Downside	25%	2.00%	3.00%	5.00%	5.00%
USD/GEL exchange rate)					
J	Upside	25%	2.75	2.75	2.75	2.75
	Base case	50%	2.81	2.81	2.81	2.81
	Downside	25%	3.23	3.39	3.56	3.56
Inflation rate, %						
·	Upside	25%	3.00%	3.00%	3.00%	3.00%
	Base case	50%	2.90%	3.60%	2.70%	2.70%
	Downside	25%	8.00%	5.00%	3.00%	3.00%

22. Risk management (continued)

Credit risk (continued)

Assigned probabilities, Subsequent Key drivers ECL scenario 2024 2025 2026 years GDP growth, % Upside 25% 6.50% 5.50% 5.00% 5.00% Base case 50% 5.00% 4.50% 5.00% 5.00% Downside 25% 3.00% 4.00% 5.00% 5.00% **USD/GEL** exchange rate 25% 2.64 2.64 2.64 Upside 2.64 Base case 50% 2.69 2.69 2.69 2.69 Downside 25% 3.09 3.25 3.41 3.41 Inflation rate, % Upside 25% 3.25% 3.00% 3.00% 3.00% 50% 3.00% 3.00% Base case 3.60% 3.00% Downside 25% 5.00% 3.00% 3.00% 3.00%

Predicted relationship between the economic indicators and default and loss rates on loan portfolios have been developed based on analysing historical data over the past 8 years. Based on the Group's macro-economic model, there is no significant dependency between macro-economic variables and loan portfolio quality.

Credit quality per class of financial asset

The following table shows internal and external grades used in ECL calculation and also the link between internal grades and credit quality categories disclosed in below tables:

	Internal grade
High grade	1
	2
	3
Standard grade	4
Sub-standard grade	5
Impaired	6

The table below shows the credit quality by class of financial assets as at 31 December 2024:

			High	Standard	Sub- standard		
31 December 2024	Note		grade	grade	grade	Impaired	Total
Cash and cash equivalents,							
except for cash on hand	5	Stage 1	403,725	_	_	_	403,725
Amounts due from credit	•	01	050 004				050 004
institutions	6	Stage 1	353,021	_	_	_	353,021
Loans to customers at amortised cost	7						
amortised cost	1	Stage 1	331,312	475,873		_	807,185
		Stage 2	331,312	350	140,575	_	140.925
		Stage 3	_	-	140,575	141,568	141,568
Corporate lending		POCI	_	_	706	571	1,277
· p - · · · · · · · · · · · · · · ·		Stage 1	2,195	30,992	_	_	33,187
		Stage 2	<i>′</i> –	<i>′</i> –	1,634	_	1,634
Loans to individuals		Stage 3	_	104	· –	1,796	1,900
Debt investment securities -							
measured at amortised cost	8	Stage 1	21,943	39,244	_	_	61,187
Debt investment securities -	_						
measured at FVOCI	8	Stage 1	7,101	_	_	_	7,101
		Stage 1	19	433	_	_	452
Other fire and in Lands	40	Stage 2	_	_	12	-	12
Other financial assets	12	Stage 3	_ 10.650		_	281	281
		Stage 1	18,652	23,556	_ 141	_	42,208 141
Undrawn loan commitments	17	Stage 2 Stage 3	_	_	141	1	141
Ondrawn loan communerts	17	Stage 1	30,348	123,750	_	<u>'</u>	154,098
		Stage 2	30,3 4 0	123,730	_	_	134,030
Guarantees	17	Stage 3	_	_	_	2,902	2,902
Total		3 3 - 0	1,168,316	694,302	143,068	147,119	2,152,805

22. Risk management (continued)

Credit risk (continued)

The table below shows the credit quality by class of financial assets as at 31 December 2023:

31 December 2023	Note		High grade	Standard grade	Sub- standard grade	Impaired	Total
Cash and cash equivalents,					_	-	
except for cash on hand	5	Stage 1	671,267	_	-	-	671,267
Amounts due from credit							
institutions	6	Stage 1	371,442	_	-	-	371,442
Loans to customers at							
amortised cost	7						
		Stage 1	373,603	296,782	_	1,337	671,722
		Stage 2	-	_	26,035	_	26,035
		Stage 3	6,642	_	1,901	140,741	149,284
Corporate lending		POCI	_	_	793	645	1,438
		Stage 1	19,577	10,535	-	-	30,112
		Stage 2	_	_	1,780	_	1,780
Loans to individuals		Stage 3	_	96	-	2,350	2,446
Debt investment securities -							
measured at amortised cost	8	Stage 1	21,951	34,149	_	_	56,100
Debt investment securities -							
measured at FVOCI	8	Stage 1	7,079	_	_	_	7,079
	12	Stage 1	96	369	-	-	465
		Stage 2	_	_	_	_	-
Other financial assets		Stage 3	_	_	_	780	780
	17	Stage 1	12,150	12,499	_	170	24,819
		Stage 2	_	_	5	_	5
Undrawn loan commitments		Stage 3	-	_	_	202	202
	17	Stage 1	89,033	47,029	5	-	136,067
		Stage 2	_	-	-	-	-
Guarantees		Stage 3				3,186	3,186
Total			1,572,840	401,459	30,519	149,411	2,154,229

See Note 7 for more detailed information with respect to the allowance for impairment of loans to customers.

Guarantees, letters of credit and loan commitments are assessed and a provision for expected credit losses is calculated in similar manner as for loans.

22. Risk management (continued)

Credit risk (continued)

The geographical concentration of Group's financial assets and liabilities is set out below:

			20	24			20	023	
	•			Other				Other	
<u>-</u>	Note	Georgia	OECD	Non-OECD	Total	Georgia	OECD	Non-OECD	Total
Assets									
Cash and cash equivalents	5	413,264	18,828	6,376	438,468	381,993	316,155	2,178	700,326
Amounts due from					•				·
credit institutions	6	349,784	3,021	143	352,948	368,479	2,768	135	371,382
Loans to customers	7	1,040,959	2,595	24,605	1,068,159	809,010	2,748	22,145	833,903
Investment securities	8	67,917	_	_	67,917	62,897	-	-	62,897
Other financial assets	12	597	_	_	597	992	-	-	992
		1,872,521	24,444	31,124	1,928,089	1,623,371	321,671	24,458	1,969,500
Liabilities									
Amounts due to credit									
institutions		9	_	_	9	9	_	-	9
Amounts due to customers	13	1,059,204	18,615	383,043	1,460,862	1,535,555	1,655	25,251	1,562,461
Lease liabilities	10	8,488	_	_	8,488	7,167	· -	· -	7,167
Other financial liabilities	12	5,476	_	_	5,476	10,955	_	-	10,955
Subordinated debt	14	85,638	_	_	85,638	81,058	_	-	81,058
		1,158,815	18,615	383,043	1,560,473	1,634,744	1,655	25,251	1,661,650
Net assets/ (liabilities)		713,706	5,829	(351,919)	367,616	(11,373)	320,016	(793)	307,850

22. Risk management (continued)

Credit risk (continued)

The risk of the insurance contract is the risk of occurrence of the insurance claim, which includes the risks of the volume and the risks of reporting period. The Group's main risk in this case is that the amount of the actual loss and insurance amount may exceed the carrying amount of the insurance liabilities. This is due of the fact that the frequency of losses and their volume may be larger than the initially estimated liability of losses.

In order to neutralize risks, the Group diversifies the portfolio of insurance contracts, thereby reducing the risk of the impact of non-recurring negative consequences on the portfolio. Neutralization of the Risks are also possible by carefully selecting and implementing an underwriting strategy, as well as by using reinsurance contracts. As part of underwriting, portfolio sensitivity analysis is carried out, which is significantly influenced by the loss rate of policies. Taking into consideration, the company establishes underwriting directives and restrictions in order to determine what kind of risks and restrictions can be accepted. Monitoring of the above-mentioned restrictions is implemented continuously.

Implemented insurance by the Group includes medicine, life, property, cargo, road and air transportation vehicles, insurance against accidents, traveling, legal responsibility or caused to third party insurance. In general, these types of insurances have 12-month duration.

The Group also uses a loss management and adjustment policy to reduce the negative impact of future non-recurring events on its activities and limits the level of risk by setting maximum loss limits for certain contracts, as well as using reinsurance mechanisms to reduce the risk associated with catastrophic events.

The management of the Group believes that due to the short-term nature of the business, the insurance portfolio is primarily sensitive to expected loss ratio volatility. The actual profit loss ratio of the company is considered along with other factors in the formation of insurance tariff in the future.

Liquidity risk and funding management

Liquidity risk is the risk that the Group will be unable to meet its payment obligations when they fall due under normal and stress circumstances.

On a monthly basis, the Assets and Liabilities Committee ("ALCO") controls liquidity risks by means of maturity analysis, determining the Group's strategy for the next financial period. Current liquidity is managed by the Treasury Department, which deals in the money markets for current liquidity support and cash flow optimization.

In order to manage liquidity risk, the Group performs daily monitoring of future expected cash flows on clients' and banking operations, which is a part of assets/liabilities management process. The Management Board sets limits on the minimum proportion of maturing funds available to meet deposit withdrawals and on the minimum level on interbank and other borrowing facilities that should be in place to cover withdrawals at unexpected levels of demand.

The liquidity position is assessed and managed by the Group primarily on a standalone basis, based on certain liquidity ratios established by the NBG including Liquidity Coverage Ratio and Net Stable Funding Ratio. The Liquidity Coverage Ratio is calculated for GEL as well as the Foreign Currency and for both, total amount. The minimum required rates are as following: GEL requirement is at least 75% or more, for USD the minimum required rate equals to 100% and the same is for the total ratio. As of 31 December, the LCR ratios were as following:

_	2024, %			2023, %		
	GEL	FC	Total	GEL	FC	Total
Liquidity Coverage Ratio						
(Total Liquid Assets / Net						
Cashflow)	148%	184%	178%	203%	132%	140%

The Net Stable Funding Ratio is measuring Group's available stable funding and required stable funding. The minimum requirement for the ratio despite the currency equals to 100%. As of 31 December, the NSFR ratios were as following:

By the end of the financial year 2024 the ratio was as following:

	<i>2024,</i> %	2023, %
Net Stable Funding Ratio (NSFR) (Available Stable Funding /		
Required Stable Funding)	183%	205%

22. Risk management (continued)

Liquidity risk and funding management (continued)

Analysis of financial liabilities by remaining contractual maturities

The tables below summarize the maturity profile of the Group's financial liabilities at 31 December based on contractual undiscounted repayment obligations. Repayments which are subject to notice are treated as if notice were to be given immediately. However, the Group expects that many customers will not request repayment on the earliest date the Group could be required to pay and the table does not reflect the expected cash flows indicated by the Group's deposit retention history. Moreover, the table does not reflect cash flows for perpetual subordinated debts with the balance of GEL 51,956 as of 31 December 2024 (31 December 2023: GEL 48,785) and with the principal amount of GEL 51,938 amount 31 December 2024 (31 December 2023: GEL 48,768) (Note 14). The cash flow on these instruments is expected to be solely interest payments paid monthly. Interest payments during 2024 was GEL 4,051 (2023: GEL 3,902).

As at 31 December 2024	Less than 3 months	3 to 12 months	1 to 5 years	Over 5 years	Total
Financial liabilities					
Amounts due to credit					
institutions	9	_	_	_	9
Amounts due to customers	539,539	592,838	357,843	3,779	1,493,999
Lease liabilities	621	1,723	7,584	714	10,642
Other financial liabilities	5,476	_	_	_	5,476
Subordinated debt	463	1,389	37,309	_	39,161
Total undiscounted financial liabilities	546,108	595,950	402,736	4,493	1,549,287
manetal habilities					
	Less than	3 to	1 to	0	
	Less triair	3 10	1 10	Over	
As at 31 December 2023	3 months	12 months	5 years	5 years	Total
As at 31 December 2023 Financial liabilities					Total
					Total
Financial liabilities					Total 9
Financial liabilities Amounts due to credit	3 months				9
Financial liabilities Amounts due to credit institutions	3 months 9	12 months - 321,014	5 years	5 years	
Financial liabilities Amounts due to credit institutions Amounts due to customers Lease liabilities	3 months 9 911,761	12 months	5 years - 346,348	5 years	9 1,589,254 9,047
Financial liabilities Amounts due to credit institutions Amounts due to customers	9 911,761 521	12 months - 321,014	5 years - 346,348	5 years	9 1,589,254
Financial liabilities Amounts due to credit institutions Amounts due to customers Lease liabilities Other financial liabilities	9 911,761 521 10,955	12 months - 321,014 1,563 -	5 years - 346,348 6,963 -	5 years	9 1,589,254 9,047 10,955

The table below shows the contractual expiry by maturity of the Group's financial commitments and contingencies. Each undrawn loan commitment and guarantees can be drawn down In less than 3 months period.

		Less than	3 to	1 to	Over	
	Note	3 months	12 months	5 years	5 years	Total
2024	17	60,650	28,767	109,753	180	199,350
2023	17	31,564	44,442	86,902	1,371	164,279

The Group expects that not all of the contingent liabilities or commitments will be drawn before expiry of the commitments. The maturity analysis does not reflect the historical stability of current accounts. Their liquidation has historically taken place over a longer period than indicated in the table above. These balances are included in amounts due in less than three months in the tables above.

22. Risk management (continued)

Market risk

Market risk is the risk that the fair value or future cash flows of financial instruments will fluctuate due to changes in market variables such as interest rates, foreign exchanges, and equity prices.

Currency risk

Currency risk is the risk that the value of a financial instrument will fluctuate due to changes in foreign exchange rates. The Group has set limits on positions by currency based on the NBG regulations. Positions are monitored on a daily basis.

The tables below indicate the currencies to which the Group had significant exposure at 31 December on its monetary assets and liabilities. The analysis calculates the effect of a reasonably possible movement of the currency rate against the GEL, with all other variables held constant on the statement of profit or loss. The effect on equity does not differ from the effect on the statement of profit or loss. A negative amount in the table reflects a potential net reduction in the statement of profit or loss or equity, while a positive amount reflects a net potential increase.

Currency	Change in currency rate 2024	Effect on profit before tax 2024	Change in currency rate 2023	Effect on profit before tax 2023
USD	20%/(20%)	879/(879)	20%/(20%)	3,173/(3,173)
EUR	20%/(20%)	407/(407)	20%/(20%)	47/(47)

Prepayment risk

Prepayment risk is the risk that the Group will incur a financial loss because its customers and counterparties repay or request repayment earlier than expected.

The effect on profit before tax for one year assuming 10% of repayable financial instruments were to prepay at the beginning of the year, with all other variables held constant, is as follows:

	Decrease of net interest income
2024	10,634
2023	8,444

Interest rate risk

Interest rate risk arises from the possibility that changes in interest rates will affect future cash flows or the fair values of financial instruments. The following table demonstrates the sensitivity to a reasonable possible change in interest rates, with all other variables held constant, of the Group's statement of profit or loss.

The sensitivity of the statement of profit or loss is the effect of the assumed changes in interest rates on the net interest income for one year, based on the floating rate non-trading financial assets and financial liabilities held at 31 December.

Currency	Increase/(decrease) in basis points 2024	Sensitivity of net interest income 2024
GEL	100/(100)	2,965/(2,965)
EUR	100/(100)	373/(373)
USD	100/(100)	2,451/(2,451)
	Increase/(decrease) in basis points	Sensitivity of net interest income
Currency	2023	2023
<u>Currency</u> GEL		
	2023	2023

22. Risk management (continued)

Operational risk

Operational risk is the risk of loss arising from systems failure, human error, fraud or external events. When controls fail to perform, operational risks can cause damage to reputation, have legal or regulatory implications, or lead to financial loss. The Group cannot expect to eliminate all operational risks, but a control framework and monitoring and responding to potential risks could be effective tools to manage the risks. Controls include effective segregation of duties, access, authorisation and reconciliation procedures, staff education and assessment processes, including the use of internal audit.

23. Fair value measurements

Fair value hierarchy

The Group uses the following hierarchy for determining and disclosing the fair value of financial instruments by valuation technique:

- ▶ Level 1: quoted (unadjusted) prices in active markets for identical assets or liabilities;
- Level 2: techniques for which all inputs which have a significant effect on the recorded fair value are observable, either directly or indirectly; and
- Level 3: techniques which use inputs which have a significant effect on the recorded fair value that are not based on observable market data.

The following table shows an analysis of financial instruments recorded at fair value or for which fair values are disclosed by level of the fair value hierarchy:

	Fair value measurement using			
At 31 December 2024	Level 1	Level 2	Level 3	Total
Assets for which fair values are disclosed Loans to customers Investment securities at amortized cost	_ _	_ 61,085	1,099,020	1,099,020 61,085
Assets measured at fair value Investment securities at FVOCI – equity			168	168
security Investment securities at FVOCI – debt security	-	7,101	108	7,101
		Fair value meas	surement using	
At 31 December 2024	Level 1	Level 2	Level 3	Total
Liabilities for which fair values are disclosed Amounts due to customers Subordinated debt	<u>-</u> -	635,166 -	830,804 65,360	1,465,970 65,360
		Fair value meas	surement using	
At 31 December 2023	Level 1	Level 2	Level 3	Total
	<u>-</u>	- 56,260	854,282 -	854,282 56,260
Assets measured at fair value Investment securities at FVOCI – equity security	- -	-	854,282 - 168	56,260 168
Loans to customers Investment securities at amortized cost Assets measured at fair value Investment securities at FVOCI – equity	- -	- 56,260 - 7,079	· -	56,260
Loans to customers Investment securities at amortized cost Assets measured at fair value Investment securities at FVOCI – equity security	- - -	-	168	56,260 168
Loans to customers Investment securities at amortized cost Assets measured at fair value Investment securities at FVOCI – equity security	- - - Level 1	- 7,079	168	56,260 168

23. Fair value measurements (continued)

Fair value of financial assets and liabilities not carried at fair value

Set out below is a comparison by class of the carrying amounts and fair values of the Group's financial instruments that are not carried at fair value in the statement of financial position. The table does not include the fair values of non–financial assets and non–financial liabilities.

_	Carrying value 2024	Fair value 2024	Unrecognised gain/(loss) 2024	Carrying value 2023	Fair value 2023	Unrecognised gain/(loss) 2023
Financial assets Cash and cash						
equivalents Amounts due from credit	438,468	438,468	-	700,326	700,326	-
institutions	352,948	352,948	_	371,382	371,382	_
Loans to customers	1,068,159	1,099,020	30,861	833,903	854,282	20,379
Investment securities	60,648	61,085	437	55,650	56,260	610
Other financial assets	597	597	-	992	992	-
Financial liabilities Amounts due to credit						
institutions	9	9	_	9	9	-
Amounts due to customers	1,460,862	1,465,970	(5,108)	1,562,461	1,562,893	(432)
Other financial liabilities	5,476	5,476	_	10,955	10,955	_
Lease liabilities	8,488	8,488	_	7,167	7,167	-
Subordinated debt	85,638	65,360	20,278	81,058	55,753	25,305
Total unrecognised change in fair value			46,468			45,862

Valuation techniques and assumptions

The following describes the methodologies and assumptions used to determine fair values for those financial instruments which are not already recorded at fair value in the consolidated financial statements.

Assets for which fair value approximates carrying value

For financial assets and financial liabilities that are liquid or having a short–term maturity (less than three months) it is assumed that the carrying amounts approximate to their fair value. This assumption is also applied to demand deposits and savings accounts without a specific maturity.

Financial assets and financial liabilities carried at amortised cost

The fair value of loans to customers, customer deposits, amounts due from/(to) credit institutions and other financial assets and liabilities, investment securities, obligations under finance leases is estimated by discounting future cash flows using rates currently available for debt on similar terms, credit risk and remaining maturities.

Financial aAssets and financial liabilities measured at fair value

Assets measured at fair value through other comprehensive income include Treasury notes issued by the Ministry of Finance of Georgia. The valuation technique used is Discounted Cash Flows (DCF), with input parameters based on government bond zero—coupon yield curves.

24. Maturity analysis of assets and liabilities

The table below shows an analysis of assets and liabilities according to when they are expected to be recovered or settled. See Note 22 "Risk management" for the Group's contractual undiscounted repayment obligations.

	2024			2023			
_	Within	More than		Within	More than		
<u>-</u>	one year	one year	Total	one year	one year	Total	
Cash and cash							
equivalents	438,468	-	438,468	700,326	_	700,326	
Amounts due from credit							
institutions	349,293	3,655	352,948	367,551	3,831	371,382	
Loans to customers	565,544	502,615	1,068,159	461,776	372,127	833,903	
Investment securities	15,003	52,914	67,917	7,079	55,818	62,897	
Property and equipment	-	14,125	14,125	-	13,888	13,888	
Right of use assets	-	8,229	8,229	_	7,160	7,160	
Intangible assets	-	10,406	10,406	-	9,012	9,012	
Deferred tax asset	<u>-</u>	-	_	_	_	-	
Income Tax Asset	10,399	-	10,399	-	-	-	
Reinsurance contract							
assets	2,766		2,766	2,685		2,685	
Other assets	13,798	35,211	49,009	1,548	92,531	94,079	
Total	1,395,271	627,155	2,022,426	1,540,965	554,367	2,095,332	
Amounts due to credit							
institutions	9	_	9	9	_	9	
Amounts due to							
customers	1,115,904	344,958	1,460,862	1,224,567	337,894	1,562,461	
Provisions	383	237	620	178	85	263	
Current income tax							
liability	_	_	_	6,006	_	6,006	
Deferred income tax							
liability	_	2,429	2,429	_	2,137	2,137	
Lease liabilities	1,547	6,941	8,488	1,297	5,870	7,167	
Subordinated debt	18	85,620	85,638	17	81,041	81,058	
Insurance contract							
liabilities	3,836	_	3,836	3,360	_	3,360	
Reinsurance contract							
liabilities	425	_	425	307	_	307	
Other liabilities	7,018		7,018	15,825		15,825	
Total	1,129,140	440,185	1,569,325	1,251,566	427,027	1,678,593	
Net	266,131	186,970	453,101	289,399	127,340	416,739	

25. Related party disclosures

In accordance with IAS 24 *Related Party Disclosures*, parties are considered to be related if one party has the ability to control the other party or exercise significant influence over the other party in making financial or operational decisions. In considering each possible related party relationship, attention is directed to the substance of the relationship, not merely the legal form.

Related parties may enter into transactions which unrelated parties might not, and transactions between related parties may not be effected on the same terms, conditions and amounts as transactions between unrelated parties.

25. Related party disclosures (continued)

The outstanding balances of related party transactions are as follows:

	2024				
	The Parent	Entities under common control	Other related parties	Key management personnel	
Loans to customers, gross	-	21,103	52,052	408	
(Allowance for expected credit losses)		(47)	(115)		
Amounts due to customers	(1,644)	(32,197)	(65,858)	(383)	
Insurance contract liabilities	-	-	2,892	_	
Other assets	-	-	178	-	
Subordinated debt (Note 14)	-	(85,638)	_	_	
Commitments and guarantees issued*	-	(237)	(34)	_	
Lease liabilities	-	(6,314)	(492)	-	

	2023				
	The Parent	Entities under common control	Other related parties	Key management personnel	
Loans to customers, gross (Allowance for expected credit losses) Amounts due to customers Insurance contract liabilities Other assets	 (25,527) _ _	35,858 (619) (24,093) - -	29,110 (466) (400,884) 2,676	448 (1) (406) -	
Subordinated debt (Note 14) Commitments and guarantees issued* Lease liabilities	- - -	(81,041) (1,178) (6,225)	(31) (579)	- - -	

^{*} The commitments and guarantees issued are presented on a net basis, after deducting the Expected Credit Loss (ECL) for credit-related commitments

As of 31 December 2024, 82% (2023: 99%) of amounts due to customers of other related parties included current accounts of 5 major related parties.

Maturity and the interest rate range of amounts due to customers of other related parties is 0-17 years and 0%-11.3%, respectively as of 31 December 2024 (2023: 0-17 years and 0%-11.3%). Maturity and the interest rate range of loans to customers is 4 to 10 years and 7.5 %-12.5%, respectively as of 31 December 2024 (2023: 10 months to 10 years and 6.5%-14.5%).

The income and expense arising from related party transactions are as follows:

	2024			2023				
	The Parent	Entities under common control	Other related parties	Key manage- ment personnel	The Parent	Entities under common control	Other related parties	Key manage- ment personnel
Interest income on loans to customers Interest expense on amounts due to	-	1,850	4,272	47	_	3,580	2,987	58
customers Interest expense on	-	(126)	(2,376)	(2)	(513)	(75)	(1,596)	(5)
subordinated debt	_	(5,852)	-	-	-	(5,637)	-	-
Charity and sponsorship	(4,800)	-	-	_	(9,500)	-	-	_
Insurance revenue Insurance service	-	-	1,519	-	-	-	1,122	-
expenses Fee and commission	-	_	(310)	-	-	-	(242)	-
income Fee and commission	9	113	170	1	5	98	111	1
expense	-	(3)	(7)	_	-	(4)	(2)	_
Other income	-	-	123	-			92	
Other expenses Interest expense on	-	-	(220)	-	-	-	(203)	-
lease liabilities	-	(550)	-	-	-	(80)	-	-

25. Related party disclosures (continued)

Compensation of key management personnel was comprised of the following:

	2024	2023
Salaries and other short-term benefits	3,273	2,540

Key management personnel as at 31 December 2024 and 2023 comprised of 11, respectively and includes members of the Group's Supervisory board, Board of Directors and other key executives of the Group.

26. Capital adequacy

The Group maintains an actively managed capital base to cover risks inherent in the business. The adequacy of the Group's capital is monitored using, among other measures, the ratios established by the NBG in supervising the Group.

During the year ended 31 December 2024, the Bank and the Group complied in full with all its externally imposed capital requirements.

The primary objectives of the Group's capital management are to ensure that the Group complies with externally imposed capital requirements set by the NBG and that Group maintains healthy capital ratios in order to support its business and maximize shareholders' value.

The Group manages its capital structure and makes adjustments to it in the light of changes in economic conditions and the risk characteristics of its activities. In order to maintain or adjust the capital structure the Group may adjust the amount of dividend payment to shareholders, return capital to shareholders or issue capital securities. No changes were made in the objectives, policies and processes from the previous years.

NBG capital adequacy ratio

Regulatory capital consists of Common Tier 1 capital, which comprises common shares, reserve fund and retained earnings less amount of asset revaluation reserve transferred to authorized capital, and intangible assets. The other component of regulatory capital is Additional Tier 1 capital, which includes perpetual subordinated debts and Tier 2 capital, which includes subordinated long-term debt.

In December 2017, the NBG adopted amendments to the regulations introduced amendment relating to capital adequacy requirements, including amendments to the regulation on capital adequacy requirements for commercial banks, and introduced new requirements on the determination of the countercyclical buffer rate, on the identification of systematically important banks, on determining systemic buffer requirements and on additional capital buffer requirements for commercial banks within Pillar II.

Starting from 1 January 2023, the NBG regulations are based on the IFRS for regulatory purposes. In 2023, The NBG added new buffer to capital adequacy requirements, Credit Risk Adjustment Buffer.

As at 31 December 2024 the NBG requires the Bank to maintain a minimum Total regulatory capital adequacy ratio, Tier 1 capital adequacy ratio and Common equity Tier 1 Capital Adequacy Ratio of 24.12%, 19.71%, and 16.37% respectively, calculated using IFRS. (December 2023: Minimum regulatory capital adequacy ratio, Tier 1 capital coefficient and common Tier 1 coefficient of 25.66%, 21.14%, and 17.73%, respectively, calculated based on regulatory requirements that was effective by the year end 2023).

	31 December 2024	31 December 2023
Common Equity Tier 1 Capital	412,587	376,292
Additional Tier 1 Capital	75,784	74,532
Tier 1 Capital	488,371	450,824
subordinated debt	16,279	22,053
General Loan Loss Provisions (up to 1.25% of Risk-Weighted Assets)	-	-
Tier 2 Capital	16,279	22,053
Total Regulatory Capital	504,650	472,877
Risk Weighted Assets	1,914,280	1,709,985
Common Equity Tier 1 Capital Adequacy Ratio	21.55%	22.01%
Tier 1 Capital Adequacy Ratio	25.51%	26.36%
Total Regulatory Capital Adequacy Ratio	26.36%	27.65%

During the years ended 31 December 2024 and 2023 the Bank complied in full with all of its externally imposed capital requirements.