UAB MEDICINOS BANKAS

BANK'S SEPARATE AND CONSOLIDATED FINANCIAL STATEMENTS
AS AT AND FOR THE YEAR ENDED 31 DECEMBER 2018
PREPARED IN ACCORDANCE WITH
INTERNATIONAL FINANCIAL REPORTING STANDARDS
AS ADOPTED BY THE EUROPEAN UNION
PRESENTED TOGETHER WITH INDEPENDENT AUDITOR'S REPORT

CONTENTS OF FINANCIAL STATEMENTS

INDEPENDENT AUDITOR'S REPORT

To the shareholders of Medicinos bankas UAB:

Report on the Audit of the Separate and the Consolidated Financial Statements

Opinion

We have audited the separate financial statements of Medicinos Bankas UAB (hereinafter –„the Bank") and the consolidated financial statements Medicinos Bankas UAB and its subsidiaries (hereinafter –„the Group") (pages from 32 to 124), which comprise the separate statement of financial position of the Bank and the consolidated statement of financial position of the Group as at 31 December 2018, the separate income statement and the consolidated income statement, the statement of the comprehensive income and the consolidated statement of other comprehensive income, the separate statement of changes in equity and the consolidated statement of changes in equity, the separate statement of cash flows and the consolidated statement of cash flows for the year then ended, and the notes to the separate and consolidated financial statements, comprising significant accounting policies and other explanatory information.

In our opinion, the accompanying separate and consolidated financial statements present fairly, in all material respects, the unconsolidated financial position of the Bank and the consolidated financial position of the Group as at 31 December 2018, and their respective unconsolidated and consolidated financial performance and their respective unconsolidated and consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards, as adopted by the European Union.

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 Separate and Consolidated Financial Statements section of our report. We are independent of the Bank and the Group in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code), and we have fulfilled our other ethical responsibilities in accordance with the Law on Audit of Financial Statements of the Republic of Lithuania and the IESBA Code.

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

Key Audit Matters

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

The key audit matter	How the matter was addressed in our audit
Valuation of loans and receivables (see notes 8 and 27 in separate and consolidated financial statements)	
The Group's impairment allowances for loans and receivables (hereinafter – loans) are calculated by classifying the Bank's loans and receivables according to their homogeneous groups and levels of risk. The Group's loans and receivables are allocated to 3 risk levels, where the 1st risk level being the lowest and the 3rd risk level being the highest. Collective impairment allowances for loans are calculated based on expected losses (probabilities of default), historical information and economic indicators, individual impairment allowances – using individual valuation, based on the level of risk. Individual impairment is mostly related to significant loans or loans with a higher risk level. Calculation of both, collective and individual allowances, is related to estimations and decision making.	We conducted these audit procedures, among others: We have identified loan approval process and tested controls and their effectiveness: regarding loan risk monitoring, identification of loss events, timely collateral revaluation, accurate and correct impairment calculation, including client rating estimation and risk level allocation. We have selected higher risk loans (including individually significant loans, loss-bearing loans, or loans that were assigned risk level 3 for other reasons) for testing risk assessment and impairment allowance calculation. We have tested the selected loan sample, arranged discussions with the responsible Bank officers and identified whether the future cash flow of the loan is calculated appropriately and whether the assumptions made while calculating the cash flow for loan repayment, discount rate and the value of collateral are reasonable).

In our opinion, these estimates and assumptions made by the Bank (interest rate, risk group, rating assignment, value of the collateral and its realization period) regarding the expected losses of loan group loans and individual loans for which cash flows for loan repayment are calculated have a significant effect on the value of the Bank's and the Group's receivables and loans. Based on these reasons, we believe that this area is a key audit matter.	We have tested valuations of the collateralized assets which usually comprise the majority of future cash flows for the loans that have indications of impairment and identified whether the methods and assumptions used in valuations were appropriate and logical, whether the market conditions between the date of valuation and the end of 2018 did not change significantly and whether there is a need to update the valuation. We have reviewed the methodology for collective impairment allowance calculations and tested whether selected sample of loan impairment calculations in accordance with the methodology. We evaluated the key parameters used in calculating collective impairment allowances and identified whether the probability of default, included in the calculations of impairment allowances is in accordance with the historic data of the Bank and the Group. We have evaluated the sufficiency and appropriateness of disclosures related to loans and receivables in the financial statements of the Bank and the Group.
Valuation of impairment of investment property and investments in subsidiaries (see notes 11 and 12 in separate and consolidated financial statements)	
The investment property of the Bank and the Group mainly consists of assets taken over for debts. In the financial statements of the Bank and the Group these assets are accounted for at lower of the balance sheet value or fair value minus selling costs. Valuations of properties taken over for debts are conducted by external evaluators and the Bank's internal evaluators, reviewed several times a year and, based on the current market situation and the possibilities to effectively realize the assets, the value of the investment property may be adjusted by the decision of the Board (in the accounting, the increase of the value is not accounted for, only the impairment is accounted for). The Bank also accounts for investments into subsidiaries in the financial statements of the Bank. These investments are carried at cost in the separate financial statements of the Bank and the carrying amount of these investments approximates the Bank's proportionate share of net assets of these subsidiaries. Accordingly, when the impairment of the investment property of the subsidiaries is registered in the accounting, the value of the Bank's investments in subsidiaries is adjusted. In our opinion, the valuation of the investment properties and determination of the recoverable amount of the investment in the subsidiaries requires the use of significant judgement and subjective assumptions. Based on these reasons, we believe that this area is a key audit matter.	We conducted these audit procedures, among others: We have assessed the management involvement in selection of the external valuators and appropriate involvement of the management in assessment and approval of valuation results obtained from the valuers. We have reviewed the valuations of the selected significant investment properties and identified whether valuations should be renewed and whether there were any changes in the market that should condition an impairment of the investment property. We have evaluated the decisions made by the Bank's management and the internal department of the asset administration regarding the impairment of the assets taken over for debts and identified whether the investment property of the Bank and the Group has any indications of impairment based on the current market conditions. We have compared the realization plan for the assets taken over for debts with the factual results and discussed further asset realization plans and their reasonableness with the Bank's management. We have reviewed the values of the investments in subsidiaries of the Bank in the financial statements of the Bank and identified whether these investments have any indications of impairment. We have evaluated the Bank's and the Group's disclosure in relation to the use of estimates and judgements regarding fair value of investment properties and the Bank's and Group's valuation policies adopted and fair value disclosures in Note 11 for compliance with the applicable financial reporting standards. We have evaluated the Bank's disclosure in relation to the use of estimate and judgements regarding recoverable amount of investments in subsidiaries as disclosed in Note 12.

Other Matter

The separate financial statements of the Bank and the consolidated financial statements of the Group for the year ended 31 December 2017 were audited by another auditor who expressed an unmodified opinion on those statements on 13 March 2018.

Other Information

The other information comprises the information included in the Bank's and the Group's annual report, but does not include the separate and consolidated financial statements and our auditor's report thereon. Management is responsible for the other information.

Our opinion on the separate and consolidated financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon, except as specified below.

In connection with our audit of the separate and 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 separate and 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.

In addition, our responsibility is to consider whether information included in the Banks's and the Group's annual management report, including corporate governance report, for the financial year for which the separate and consolidated financial statements are prepared is consistent with the separate and consolidated financial statements and whether annual management report has been prepared in compliance with applicable legal requirements. Based on the work carried out in the course of audit of the separate and consolidated financial statements, in our opinion, in all material respects:

- The information given in the Bank's and the Group's annual management report, including corporate governance report, for the financial year for which the separate and consolidated financial statements are prepared is consistent with the separate and consolidated financial statements; and

- The Bank's and the Group's annual management report has been prepared in accordance with the requirements of the Law on Consolidated Financial Reporting by Groups of Undertakings of the Republic of Lithuania and the Law on Financial Reporting by Undertakings of the Republic of Lithuania.

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

Management is responsible for the preparation and fair presentation of the separate and consolidated financial statements in accordance with International Financial Reporting Standards, as adopted by the European Union, and for such internal control as management determines is necessary to enable the preparation of separate and consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the separate and consolidated financial statements, management is responsible for assessing the Bank's and 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 Bank and the Group's or to cease operations, or has no realistic alternative but to do so.

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

Auditor's Responsibilities for the Audit of the Separate and Consolidated Financial Statements

Our objectives are to obtain reasonable assurance about whether the separate and 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 separate and consolidated financial statements.

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

- Identify and assess the risks of material misstatement of the separate and 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 Bank's and 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 Bank's and 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 separate and 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 Bank and the Group to cease to continue as a going concern.

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

- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

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

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

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

Report on Other Legal and Regulatory Requirements

Under decision of the general shareholders' meeting we were appointed on 30 March 2019 for the first time to audit the Bank's and the Group's separate and consolidated financial statements. Our appointment to audit the Bank's and the Group's separate and consolidated financial statements is renewed every second year under decision of the general shareholders' meeting, and the total uninterrupted period of engagement is 2 years (for the audit of 2018 and 2019).

We confirm that our audit opinion expressed in the Opinion section of our report is consistent with the audit report for the separate and consolidated financial statements presented to the Bank and the Group and its Audit Committee.

We confirm that to the best of our knowledge and belief, we have not provided any prohibited non-audit services referred to in Article 5(1) of the Regulation (EU) No 537/2014 of the European Parliament and of the Council.

In the course of audit, except for the services disclosed in the Group annual report or separate and consolidated financial statements, we have provided the following services to the Bank: The Bank's participation in targeted longer-term refinancing operations (TLTRO) project data verification services and the Bank's prospective financial information verification services.

The audit engagement partner for this independent auditor's report is Romanas Skrebnevskis.

Auditor Romanas Skrebnevskis
Auditor certificate No. 000471

ROSK Consulting UAB
Audit company certificate No. 001407

Vilnius, Lithuania
5 March 2019

(All amounts in EUR thousand unless otherwise stated)

ANNUAL MANAGEMENT REPORT

The reporting period covered by the Consolidated Annual Report

Year 2018.

Group companies, contact details and types of their main activities

Company name	UAB Medicinos Bankas
Legal form	Joint stock company
Legal address	Pamėnkalnio St. 40, LT-01114 Vilnius
Legal entity code	112027077
Registration date and place	24 November 1992, Vilnius (as KB Ancorobank), and 16 January 1997 reorganized into UAB Medicinos Bankas.
Telephone	(8 5) 264 48 00
Facsimile	(8 5) 264 48 01
E-mail address	info@medbank.lt
Website address	www.medbank.lt

Main activities. UAB Medicinos Bankas is a joint stock company, a credit institution operating on share capital basis and is licensed by the Bank of Lithuania to engage in such types of activities as acceptance of deposits and other refundable means from non-professional market participants and funds lending, also it is entitled to engage in offering other financial services and assumes relevant related risks and liability.

Company name	UAB MB Turtas
Legal form	Joint stock company
Legal address	Pamėnkalnio St. 40, LT-01114 Vilnius
Legal entity code	302426051
Registration date and place	12 August 2009, Vilnius
Telephone	8 612 35933
Facsimile	(8 5) 264 48 01
E-mail address	mbturtas@medbank.lt
Website address	www.mbturtas.lt

Main activities. Real estate management and development.

Company name	UAB MB Valda
Legal form	Joint stock company
Legal address	Pamėnkalnio St. 40, LT-01114 Vilnius
Legal entity code	302461718
Registration date and place	30 November 2009, Vilnius
Telephone	8 612 62039
Facsimile	(8 5) 264 48 01
E-mail address	mbvalda@medbank.lt
Website address	www.mbturtas.lt

Main activities. Real estate management and development.

Company name	UAB MB Investicija
Legal form	Joint stock company
Legal address	Pamėnkalnio St. 40-17, LT-01114 Vilnius
Legal entity code	302700004
Registration date and place	16 December 2011, Vilnius
Telephone	8 682 82107
Facsimile	(8 5) 264 48 01
E-mail address	info@mbinvesticija.lt
Website address	www.mbturtas.lt

Main activities. Real estate management and development.

(All amounts in EUR thousand unless otherwise stated)

Company name	UAB TG Invest-1
Legal form	Joint stock company
Legal address	Pamėnkalnio St. 40-5, LT-01114 Vilnius
Legal entity code	302464707
Registration date and place	17 May 2013, Vilnius
Telephone	8 682 82107
Facsimile	(8 5) 264 48 01
E-mail address	e-saskaita@tginvest1.lt
Website address	www.mbturtas.lt

Main activities. Real estate management and development.

Company name	SIA Nida Capital
Legal form	Joint stock company
Legal address	Valnu St. 3-25, LV-1050 Riga
Legal entity code	40103774894
Registration date and place	31 March 2014, Riga
Telephone	8 612 23 933
Facsimile	(8 5) 264 48 01
E-mail address	info@medbank.lt
Website address	www.mbturtas.lt

Main activities. Granting of consumer credit.

Company name	UAB Saugus Kreditas
Legal form	Joint stock company
Legal address	Panerių St. 42, LT-03202 Vilnius
Legal entity code	302547722
Registration date and place	01 September 2010, Vilnius
Telephone	8 700 33303
E-mail address	info@sauguskreditas.lt
Website address	www.sauguskreditas.lt

Main activities. Granting of consumer credit to natural persons.

1. Objective overview of the Bank's and the Group's status, activities and development, analysis of the Group's financial performance

In 2018, the Group earned net profit of EUR 2.39 million, the Bank – EUR 2.44 million. It was mostly influenced by the increase in all bank activity income, which resulted in an income increase by 25.40 percent or EUR 3,37 million. The Group's revenue from net service fee and commission income increased by 59.14 percent or EUR 1.95 million, net foreign exchange gain increased by 22.03 percent or EUR 0.84 million. The Group's net interest income during the year increased by 12.53 percent or EUR 0.84 million.

The Group's operating expenses increased by 13.56 percent or EUR 1.54 million mainly due to the increase of other operating expenses. Impairment loses, related with the Group's loans and other financial assets value decrease, increased by EUR 1.08 million.

At the end of 2018, the Group's assets amounted to EUR 324.76 million, since 2017 the assets increased by EUR 39.58 million or 13.88 percent. The Group's loan and receivables portfolio during the year 2018 increased by 4.98 percent and reached EUR 171.83 million. The proportion between total provisions and loan portfolio of the Group during the year decreased from 3.40 percent at the beginning of the year to 1.49 percent at the end of the year 2018. The decline in the indicator was a result of a transaction in the sale of part of the bad loan portfolio in the amount of EUR 5.90 million (creditor claims amount was EUR 10.1 million).

During the year, deposits in the Bank increased by 14.80 percent to EUR 289.13 million.

At the end of 2018, the shareholders' equity of the Group was EUR 30.53 million, i.e. it increased during the year by EUR 3.08 million or 11.24 percent. During the year, the Group's capital adequacy ratio, which reflects the Group's assumed risk coverage by capital and the Group's stability, increased from 15.01 percent at the end of the year 2017 to 17.66 percent at the end of the year 2018.

Description of the main risk types and uncertainties

The risks related to activities of the Group and the Bank are managed in line with the principles of Risk Management Policy approved by the Board of the Bank. Certain operating risks are hedged by implementing the internal system of limits. The structure of Group's risks is traditional, i.e. credit, market, liquidity, and operating risks prevail. The Bank does not use hedging instruments to manage the risks described above.

In 2018, the Bank complied with all the prudential requirements specified by the Bank of Lithuania: liquidity requirements and large exposure requirements and capital or own fund requirements.

Ratios and prudential requirements for banking activities

Capital or own funds requirements - banks shall satisfy the following own funds requirements:
- a common equity Tier 1 capital ratio of 4.5 per cent;
- a Tier 1 capital adequacy ratio of 6 per cent;
- a total capital ratio of 8 per cent.

Additional capital buffer requirements:
- capital conservation buffer of 2.5 per cent;
- institution's special countercyclical capital buffer requirement. From 31st December 2018 for the position which is related with Lithuania requires 0.5 per cent of special countercyclical buffer.

Liquidity requirements – Liquidity coverage ratio (LRC). It is one of the main liquidity measures for financial institutions indicating how well short-term obligations are covered with highly liquid assets. It reveals how well a company is prepared for a short-term liquidity disruptions. According to EU Regulations, by the compulsory requirement, the Bank must operate under a liquidity coverage ratio (LCR) not lower than 100%.

The large exposure requirement - Exposure to a client or a group of connected clients, i.e. loans granted, also any asset or off-balance-sheet asset share cannot exceed 25 per cent of the institution's eligible capital.

Bank's main profitability ratios

Return on equity (ROE) - Return on equity is a ratio calculated dividing net profit by the shareholders' equity. It measures the profitability of a company by revealing how much of the profit can a company earn on the shareholders' investments. The higher ratio is, the more profitable is an equity investment in the company.

Return on assets (ROA)- Return on assets is a ratio calculated dividing net profit by the total assets. It measures the profitability and management efficiency by revealing how well the assets are used for profit generation. The higher ratio is, the more efficient the company is in using its assets to generate return to shareholders.

Credit risk

Credit risk is the risk that the Group and the Bank will incur loss because their customers or counterparties failed to discharge their contractual obligations. The Group and the Bank manage and control credit risk by setting limits on the amount of risk they are willing to accept for individual counterparties and for industry concentrations, and by monitoring exposures in relation to such limits. The Group has established a credit quality review process to provide early identification of changes in the creditworthiness of counterparties, including regular collateral revision. The credit quality review process allows the Group and the Bank to assess the potential loss to which it is exposed and to take the necessary corrective action.

Liquidity risk

Liquidity risk refers to the availability of sufficient funds to meet deposit withdrawals and other financial commitments related to financial instruments as they actually fall due. In order to manage liquidity risk, the Group and the Bank perform daily monitoring of internal limits and future expected cash flows on clients' and banking operations, which is a part of assets/liabilities management process.

Market risk

The Group and the Bank experience risk exposed to effects of fluctuation in the prevailing foreign currency exchange rates on their financial position and cash flows. The currency risk is managed by monitoring the risk exposure against the limits established for single open currency position. Positions are monitored on a daily basis. The Bank's policy is to keep foreign exchange positions more or less closed.

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 Board has established limits on the interest rate gaps and the minimum interest rate margin. The limits are monitored on a monthly basis. Interest rate risk is managed by forecasting the market interest rates and by managing the mismatches between assets and liabilities from re-pricing maturities.

Real estate market price risk is the risk to incur losses due to low market liquidity that disables to sell assets at the desired time for a desired price or a possibility to sell available assets (investments) is lost. The market risk is managed and controlled by continuous market monitoring and analysis of forecasted market changes.

Operational risk

Operational risk is the risk to incur losses due to improper internal processes, human mistakes, system disorders or external factors. Definition of operational risk involves legal and reputational risks.

Detailed information about main risks and implementation of prudential requirements set by the Bank of Lithuania is presented in explanatory notes 33 and 34 to the financial statements for the year 2018.

2. Non-financial performance analysis of the Bank and the Group, environmental protection and human resource information

The Group continued to provide its long-time support to the Charity and Support Fund of S. Karosas. The fund was established 19 years ago, has provided financial support to young musicians and future artists, therefore the Group is glad to be a part of the country's artistic and cultural development.

As at 31 December 2018 the Bank employed 369 employees (383 employees as at 31 December 2017).

3. Notes on consolidated financial statements and data

Key financial data are presented in the Group's consolidated financial statements.

4. Data on acquisition of own shares

UAB Medicinos Bankas and the Group's enterprises do not have own shares, they did not acquire or transfer own shares during the reporting period.

5. Information about the Bank's branches and representatives

At the end of 2018, the Bank had 52 client service subdivisions: 7 branches, 45 customer service divisions and subdivisions in different regions of Lithuania.

Bank branches:

Vilnius Branch
Pamėnkalnio St. 40, LT-01114 Vilnius

Kaunas Branch
Donelaičio St. 76, LT-44248 Kaunas

Klaipėda Branch
Šermukšnių St. 1, LT-91206 Klaipėda

Šiauliai Branch
Varpo St. 25-10, LT-76298 Šiauliai

Panevėžys Branch
J. Basanavičiaus St. 3, LT-35182 Panevėžys

Lazdijai Branch
Seinų St. 5-41A, LT-67113 Lazdijai

Telšių Branch
Kęstučio St. 1A – 2, LT-87121 Telšiai

6. Material events after the end of financial year

January 16, 2019 the main shareholder of the Bank Saulius Karosas died. This event has no significant impact on the Bank's activities, and the Bank is still managed by the Supervisory Board, the Management Board and the Chief Executive Officer. The Bank of Lithuania sees no reason to take supervisory action. In the near future, it should become clear who will become the main shareholder of the Bank.

As long as the Bank of Lithuania has not granted a permission for another person to take over Saulius Karosas‘ shares, as well as until the Bank is informed about the transfer of ownership of Saulius Karosas shares to another person, the other person will not have the right to exercise the rights granted by these shares, including voting at the general shareholders meetings.

In February 2019, the Management Board of the Bank decided to reorganize 4 subsidiaries managed by the Bank during year 2019 by merging them, thus optimizing corporate and asset management. It was decided to merge UAB MB assets, UAB MB Valda, UAB MB Investicija and UAB TG Invest-1.

The sale and purchase agreements of the subsidiaries, which were signed in December 2018, were finalized in January 2019. After the completion of these transactions, the share directly managed by the Bank has changed.

7. Company's business planning & forecasting

The Bank has developed a long-term plan for the period from 2019 until 2021.

The main objectives of the Bank are to ensure a profitable and successfully growing banking business by providing high quality services to the Bank's target customers – micro, small and medium-sized businesses. The Group's management structure ensures prompt and high quality work with customers in selecting the individual client-tailored solutions and rapid response into changes in the financial markets. Rational customer service network enables the Group to ensure growing income from the daily financial services provision. Despite the rapid development of information technologies, direct human contact remains very important, which is based on the relationships between the Group and its customers based on mutual trust and respect screened by the long-term co-operation. Another important factor to ensure an efficient provision of standard product services and an increase of competitiveness in the provision of services is a continuous development of new technologies and banking innovations.

Taking into consideration the increasing supervisory requirements, the economic environment and the strategic goal to ensure stable performance, the Bank pays special attention to increase its own capital basis. As a part of this strategy, in the near future it is intended to increase the Bank's capital basis by transferring all profit earned in 2019–2021 into capital reserves.

8. The Group's information on the remuneration policy and its implementation

Remuneration Policy of UAB Medicinos Bankas, which was approved on 12 September 2018 by the decision of the Supervisory Board (No. N-30/18), applies to the Bank's and the Group's staff. The policy sets out clear principles for remuneration of work, to fairly and transparently reward work and results, to motivate, encourage and enable employees to increase performance, quality, to pursue the Group's goals, to maintain and attract competent employees. Policy principles are designed to meet the long-term interests of the Group, its business strategy, goals, values, and promote sound and effective risk management, avoid conflicts of interest, and ensure the principles of investor and customer protection when providing services.

Components of the remuneration system of the Group employees: fixed part of the remuneration, variable part of remuneration, monetary supplements to fixed remuneration, additional occasional benefits.

The system of fixed remuneration is based on a matrix of job levels, grouping of positions into levels, taking into account the importance of the position to the activities of the Group. The level of responsibility is determined by evaluating the required competence, level of responsibility, independence, creativity, complexity and conditions of work.

The variable part of the remuneration is allocated for the achievement of the set operational targets. The allocated variable part and size are determined by the levels of the job, the period during which the performance can be assessed: quarterly or annual.

Conditions, value and circumstances of Additional occasional payments are described under the Group's internal acts.

Variable component could be paid:
- For additional (parallel) job;
- For substitution of temporary free position;
- For temporary bigger work flow.

The amount of additional occasional benefits (benefits, gifts), the terms of appointment and payment are set in the Bank's internal legislation. Decisions regarding the determination of a fixed remuneration for the employee, money supplements to the fixed remuneration, determination and payment of additional occasional benefits shall be taken by the CEO in accordance with the principles set out in this Policy and other requirements of internal legislation.

The Bank's Supervisory Board is responsible for setting the principles of the Remuneration Policy and calculation models of the variable part of the remuneration. Due to the Group's size, organizational structure, operational nature and scale there is no the Remuneration Committee. Its functions are dedicated to the Bank's Supervisory Board. The Bank's Supervisory Board assesses Remunerations policy adequacy to Groups taken risk, capital of the Bank, its liquidity and compatibility with Bank strategy and long-term performance interests.

(All amounts in EUR thousand unless otherwise stated)

General quantitative information by business areas:

Year 2018	Fixed remuneration (thous. EUR)*	Variable remuneration (thous. EUR)	Number of recipients
UAB Medicinos Bankas	**5 402**	**173**	**448**
The Bank's senior management	292	-	4
Employees whose decisions could significantly impact the risk taken	694	1	28
Other employees	4 416	172	416
Employees of the Group companies	208	3	20
Total for the Group	**5 610**	**176**	**468**

* Paid amounts without taxes paid by employer

** The number of recipients includes the number of employees recruited and dismissed

The other remuneration payments (benefits and bonuses) for the Bank's employees subject only to the general principles of the Remuneration Policy. All of designated variable part of the remuneration in 2018 was paid in cash.

Benefit appointment related with the termination of a contract:

Year 2018	Number of recipients	Amount of severance pay (thous. EUR)	Biggest amount for one recipient (thous. EUR)
The Bank	30	120	15
The Group companies	-	-	-

9. Information on the internal management

The Bank's management code is described below. The bodies of the Bank are as follows: the General Meeting of the Shareholders of the Bank, Council of the Bank, Board of the Bank and Chief Executive Officer (hereinafter - CEO). The management bodies of the Bank are as follows: Board of the Bank and Chief Executive Officer.

General Meeting of Shareholders takes place annually, within 3 months after the end of fiscal year. The extraordinary meeting of shareholder may also be convened. The shareholders, having no less than 1/10 of all the votes, as well as the Bank's Board and Supervisory Council have an initiative right of convening the meeting. The Law on Companies of the Republic of Lithuania specifies the cases when a general meeting can be convened by other persons.
The competence of the General Meeting of Shareholders and shareholders' rights and their exercising are provided for by the laws of the Republic of Lithuania. If the meeting cannot take place due to lack of a quorum (more than 1/2 of the total votes), the re-convened meeting of shareholders with the valid agenda of the previous meeting shall be summoned.

Exclusively the General Shareholders' Meeting:

- amends Charter of the Bank, except in cases, provided in the laws;
- changes domicile of the Bank;
- elects the Bank's Supervisory Council members;
- recalls the Bank's Supervisory Council or its individual members;
- elects and recalls the audit company to audit the annual financial statements, sets the terms of payment for audit services;
- approves the set annual financial statements of the Bank;
- sets class, number, par value and minimum issue price of the shares, issued by the Bank:
- issues of convertible bonds;
- cancels the preference right to purchase shares or convertible bonds of the Bank of a given emission to all of the shareholders;
- converses of the Bank's shares of one class into another, approves the conversion order;
- allocates profit (loss);
- making, use, reduction and cancellation of reserves;
- increases authorized capital;
- reduces of authorized capital, except of the cases, provided in the laws;
- purchase by the Bank of its own shares;
- reorganization or demerge of the Bank and approving terms of such reorganization or demerge;
- restructures of the Bank;
- liquidates of the Bank, cancels of liquidation, except cases, provided in the laws;
- selects and cancels the Bank's liquidator, except cases, provided in the laws.

The General Shareholders' Meeting may also resolve other issues, if according to the laws and the Bylaws of the Bank it is not assigned to the competence of other bodies of the Bank and if it is not a function of the Bank's management bodies in essence.

The Supervisory Council of the Bank is a collegial body supervising the activities of the Bank. The Supervisory Council is directed by its Chairman. The Supervisory Council consisting of 4 (four) members is elected by the General Meeting of Shareholders for a term of four years. The initiators of the Meeting or the shareholders holding shares that grant at least 1/20 of the Bank's shares, shall have the right of proposing the members of the Supervisory Council. The candidates are proposed before the Meeting or during such Meeting. If the candidates are proposed before the meeting, each shareholder may get acquainted with the information about the candidate collected by the Bank according to the legal acts of the Republic of Lithuania and the internal legislation of the Bank. Each candidate to the Supervisory Council's members irrespective of whether he was proposed before or during the meeting, may be invited to the meeting and shall inform the Meeting about his current capacity and how his activities are related to the Bank or to other legal entities associated with the Bank.
While electing the Supervisory Council's members each shareholder shall have such number of votes which is equal to the product of the numbers of votes granted to him by the shares owned and number of the Supervisory Council's members to be elected. These votes are allocated by the shareholder at his own discretion - for one or several candidates. The candidates who receive the biggest number of votes are elected.

1 (one) independent member is elected to the current tenure of the Supervisory Council. In accordance with the Bank's Charter the number of tenures of the Council member is not limited.
The functions of the Supervisory Council are as follows:

- elect members of the Board and remove them from office. If the Bank operates at a loss, the Council must consider the suitability of the Board members for their positions;
- supervises the activities of the Board and the Head of Administration;
- Adopts the Rules of Procedure of the Supervisory Council of the Bank;
- approves the Bank's business plans;
- ensures that the Bank has effective internal control and internal audit systems;
- establishes the Audit Committee and approve the regulations of the Committee;
- Submits proposals and comments to the Annual General Meeting regarding the Bank's activity strategy, the Bank's annual financial statements, the draft profit (loss) distribution plan and the Bank's annual report, as well as the activities of the Board and the CEO;
- defines the procedure for lending that is only possible with the approval of the Supervisory Board;
- Makes proposals to the Management Board and the CEO to revoke their decisions that are in conflict with laws and other legal acts, the Articles of Bylaw of the Bank or decisions of the General Shareholders Meeting;
- discusses and resolves other issues that are to be considered or resolved by the Supervisory Board in accordance with laws and the Bank's Articles of Association as well as decisions of the General Meeting of Shareholders.

The Management Board is a collegial Bank management body, consisting of 4 (four) members. It manages the Bank, handles its matters and answers under the laws for the execution of the Bank's financial services. Order of the Board's work is set by the Board work regulations. The Board members are elected, recalled and supervised by the Bank's Supervisory Council. The Board of the Bank is elected by the Council for a term of 4 years - the number of tenures is not limited. If individual Board members are elected, they are elected till the end of the active Board's term.
The Bank's Management Board shall consider and approve:

- the annual report of the Bank;
- the structure of the Bank management and positions; posts in which persons are employed only by approve of Management board or by holding competitions;
- regulations of the branches, representatives and other separate subdivisions of the Bank;
- regulations of the Loan Committee and Risk Management Committee of the Bank;
- the Board determines the information to be considered commercial secret of the Bank.

The Board shall elect (assign) and remove from office the Chief Executive Officer and his deputies. The Board sets salary and other terms of labour contract with the Chief Executive Officer, approves his Staff Regulations, induces and imposes sanctions to the Chief Executive Officer.

The Board shall adopt:

- decisions on the Bank becoming the incorporator, member of other legal entities;
- decisions on opening branches, representatives and other separate subdivisions of the Bank as well as on cancellation of their activities;
- decisions on the investment, transfer or lease of long-term assets the balance-sheet whereof amounts to over 1/20 of the Bank's authorized capital (calculating separately for each kind of transaction);
- decisions on the mortgage or hypothec of long-term assets the value whereof amounts to over 1/20 of the Bank's authorized capital (calculating separately for each kind of transaction)
- decisions on offering guarantee or surety for the discharge of obligations of other entities, when the amount of the obligations exceeds 1/20 of the Bank's authorized capital;
- decisions on the acquisition of long-term assets the price whereof exceeds 1/20 of the Bank's authorized capital;
- decisions on issuing of non-convertible bonds;
- Board work regulation;

- decisions on other matters it has to consider or solve under the Laws or Charter of the Bank.

The Board shall set:
- Terms for the issue of the bonds of the Bank. When the General Shareholders' Meeting adopts a resolution regarding the issuing of convertible bonds, the Board is entitled to set additional terms of issuing and to approve bond subscription agreements, signed by the Chief Executive Officer or his authorized person;

The Board shall execute resolutions passed by the Meeting and Supervisory Council.
The Board shall analyse and evaluate the material submitted by the Chief Executive Officer on:
- implementation of the Bank's activities plan;
- arrangement of the Bank's activity;
- the Bank's financial position;
- results of economic activities, income and expenditure estimates, stock-taking data and other records of valuables.

The Board also analyses, assesses the Bank's draft annual financial statements and draft of the profit (loss) allocation and submit them to the Board and General Meeting of Shareholders. Also, the Board shall solve other matters of the Bank's activities, if they are out of the other managing bodies' competence under the laws and this Charter.

The Board shall convene and hold the General Shareholders' Meetings in due time.

Chief Executive Officer is the sole governing body of the Bank. Chief Executive Officer acts in the name of the Bank, organizes the Bank's day-to-day activities and has other functions assigned by laws of the Republic of Lithuania and by the Bank's Statute.

Functions of the CEO:
- to arrange everyday activities of the Bank;
- to engage and discharge employees, make work contracts with them and terminate them, induce them and impose sanctions. The CEO is entitled to authorize another Bank employee to perform actions listed therein;
- to represent the Bank in its relations with other persons, in court and arbitrage without special authorization;
- to grant and cancel powers of attorney and procurements;
- to issue orders;
- to perform other actions, necessary to perform his functions, to implement decisions of the Bank's bodies and to ensure Bank's activities.

Chief Executive Officer is responsible for:
- arrangement of the Bank's activity and implementation of its aims;
- making of annual financial statements and preparation of the Bank's annual report;
- making of a contract with the audit company;
- delivery of information and documents to the Meeting, Board and Supervisory Council in the cases, provided for in the laws or upon request;
- delivery of the Bank's documents and data to the custodian of the Register of Legal Entities;
- delivery of the documents to the Register of Legal Entities;
- publication of the information, prescribed by the laws and other legal acts, in the media sources stated in this Charter;
- information delivery to the shareholders;
- Establishment and submission of a list of the Bank's shareholders;
- execution of other duties, prescribed by the laws and legal acts, this Charter and Staff regulations of the Chief Executive Officer.

The Chief Executive Officer acts on the Bank's behalf and is entitled to make transactions at his sole discretion, except for the exceptions, stated therein or in the resolutions of the bodies of the Bank.

The Chief Executive Officer and the members of the Board and Supervisory Council may participate in the general meetings of shareholders.

3 members of the Supervisory Board were elected at the Bank's Ordinary General Meeting of Shareholders on 30 March 2016. Kęstutis Jovaišas was elected as a member of the Supervisory Board at the Extraordinary General Meeting of Shareholders held on 26 October 2018.

(All amounts in EUR thousand unless otherwise stated)

As of 31 December 2018, the members of the Bank's Supervisory Board are:

Name, Surname	***Position in Supervisory Board***	***Workplace***
Irmantas Kamienas	Chairman of Bank's Supervisory Board	MB „Bratus“ director, į.k.303046931, address: Santariškių st.75-26, Vilnius
Laima Petkevičiūtė	Member of Bank's Supervisory Board	UAB „MB valda“ director‘s advisor, company code.302461718, address: Pamėnkalnio st. 40, Vilnius
Vytenis Rasutis	Member of Bank's Supervisory Board	UAB Medicinos bankas, manager-currency dealer, company code 112027077, address: Pamėnkalnio st. 40, Vilnius
Kęstutis Jovaišas	Member of Bank's Supervisory Board	UAB „Civitta“ partner-general manager, į.k.302477747, address: Gedimino av. 27, Vilnius

The end of the term of the duty of the members of the Bank's Supervisory Board is in 2020.

Members of the Bank's Supervisory Board in 2018 hadn’t received wages, bonuses, melons or other payments for participation in the Supervisory Board.

The Bank's Management Board consists of 4 members. The Management Board of the Bank appoints and revokes the Chief Executive Officer and his deputies for the organization of daily banking activities. The Bank's Management Board is responsible for ensuring that the Bank's activities comply with the law in order to implement the Bank's Strategy established by the Bank's Supervisory Board, as well as for the development, periodic review and enforcement of the Bank's core business policies. The Management Board of the Bank is also responsible for the establishment, improvement, monitoring and control of the risks faced by the Bank, and the establishment and improvement of reporting processes, the establishment of permissible risk limits. The Management Board determines how bank capital will be used to cover the risk. The Management Board forms the values of the Bank and the Group and adopts a code of conduct, ensures that the Bank and the Group operate an effective information and communication system.

Members of the Management Board were elected at the Bank's Supervisory Board meeting in 30 March 2016.

As of 31 December 2018, the members of the Bank's Management Board are:

Name, Last name	***Position***
Dalia Klišauskienė	Chairman of the Management Board, CEO
Arnas Žalys	Member of the Management Board, deputy CEO, Head of Financial services
Igor Kovalčiuk	Member of the Management Board, deputy CEO, Head of Legal and compliance services
Marius Arlauskas	Member of the Management Board, deputy CEO, Head of Business management services

The end of the term of the duty of the members of the Bank's Management Board is in 2020. The Chief Executive Officer of the Bank and the members of the Board of the Bank do not hold other senior positions in other legal entities.

Salary average paid to a member of the Management Board in 2018 was 56 thousand. EUR. No bonuses, melons or other payments were paid to Members of the Management Board of the Bank in 2018.

Information on the principles for the election of the members of the Board and the amendment of the Bank's Articles of Association

The principles of the election of the members of the Board of the Bank are regulated by the Bylaws of the Bank, the Law on Companies of the Republic of Lithuania and the Law on Banks of the Republic of Lithuania. The diversity policy related to aspects such as age, gender, education, professional experience is applicable as it is regulated by the laws described above and is applied to the election of the CEO, management and supervisory bodies.
The Bank shall not discriminate on grounds of sex, sexual orientation, race, nationality and social status, religion, marital or family status, age, beliefs or attitudes, affiliations to political parties and public organizations in relation to the merits of the

Employees in the context of the selection of Management Board members. Selection of Management Board members - to form an effective team that would not only be able but also capable to achieve the Bank's goals. For the quality selection of Management Board members, the Bank Group uses modern, innovative tools to search for vacant positions, with the aim of ensuring maximum dissemination of information and maintaining a good image of the Group as an employer.

Main Selection Criteria for Employees: Compliance with the requirements set by the Bank of Lithuania, internal legislation of the Group; subject-specific competence - appropriate education, work experience, subject knowledge, skills, abilities required for future work; personal qualities that determine and operate a particular job successfully.
Amendments to the Articles of Association of the Bank shall be made in accordance with the Law on Companies and the Articles of Association of the Bank. Last time the Bank's Articles of Association were changed in 31 March 2016.

Committees of the Bank

The Bank has continuously operating non-structural divisions: Loan, Internal Audit and Risk Management committees. Formation of the Loan, Internal Audit and Risk Management committees, their activities and competence are established by the Supervisory Authority legislation, the Statute, committee regulations and other regulations approved by the Bank bodies.

Loan Committee examines the loan application documents, takes decisions regarding loans granting and the conditions for granting loans and their amendments, evaluates credit risk, provides suggestions on the loan, the loan interest rate, improvement of loan administration procedures, and performs other functions approved by the Board. The Board approves the members of the Loan Committee and performs its supervision.

Information about the members of the Loan Committee 31 December 2018.

	Name, Last name
Chairman	Laura Ivaškevičiūtė
Members:	Lina Babelienė
	Raimundas Keršys
	Julius Ivaška
	Saulius Laučius

The Risk Management Committee determines, assesses, monitors and controls all types of risks faced by the Bank and the Bank's financial group. The Committee also controls the acceptable risk parameters, and performs other functions prescribed by the regulations. The Board approves the members of the Risk Management Committee and performs its supervision.

Information about the members of the Risk Management Committee 31 December 2018.

	Name, Last name
Chairman	Arnas Žalys
Members:	Aleksejus Tonkich
	Snieguolė Kudrevičienė
	Laura Ivaškevičiūtė
	Julius Ivaška

The Bank Audit Committee periodically discusses the effectiveness of the Bank's internal control systems, coordinates and periodically evaluates the internal audit department's work. The Committee discusses internal and external audit reports and performs other duties prescribed by the Supervisory Authority legislation and by the regulations of the Internal Audit

Committee. The Council approves the members of the Internal Audit Committee and the Committee's regulations, and performs the supervision of the Committee.

Information about the members of the Internal Audit Committee 31 December 2018.

	Name, Last name
Chairman	Laima Petkevičiūtė
Members:	Irmantas Kamienas
	Vytenis Rasutis
	Kęstutis Jovaišas

The Board and the Chief Executive Officer are the Bank's management bodies.

10. Internal control system of the Bank

Requirements for internal control system of the Bank are established by laws and the legislation of the Supervisory Authority. The reliable and proper internal control system and an independent Audit Division ensure efficiency of the Bank's internal control.

Audit Division is the Bank's internal audit unit that develops internal control system evaluation methods, analyses and evaluates the adequacy and efficiency of the Bank's internal control system, and the use of internal control procedures. Internal Audit Division checks whether the assumption of risk does not exceed the Bank's risk limits and compliance with legislative requirements and the requirements of the Supervisory Authority, the implementation of the Bank's business strategy, the Bank's policies and compliance with the Bank's policy and procedures; it also performs other functions prescribed by the regulations. Internal Audit Division activities and regulations are approved by the Internal Audit Committee.

11. Information on transactions with related parties

When a bank deals with related parties, the Bank follows market prices, the Bank has not entered into transactions with related parties that are classified as unusual economic activities and (or) have a significant influence on the Company, its finances, assets and liabilities.

12. Information on existing restrictions on voting rights

In 16 January 2019 after the death of the main shareholder of the Bank Saulius Karosas, in the near future it should be clear who will become the main shareholder of the Bank. Until the Bank didn't received authorization from the Bank of Lithuania to another person to take over the Bank shares held by Saulius Karosas, and until the Bank is informed about the transfer of ownership of Saulius Karosas shares to another person, the other person will not have the right to exercise the rights attached to these shares, including voting at the General Shareholders meetings. Restricted shares accounts to 89.91 percent from the total number of voting shares.

5 March 2019

Acting Chairman of the Board and Chief Executive Officer Dalia Klišauskienė

Corporate Governance Reporting Form
(appendix to the annual management report for 2018)

UAB Medicinos bankas acting in compliance with Article 22 (3) of the Law of the Republic of Lithuania on Securities and paragraph 24.5 of the Listing Rules of AB Nasdaq Vilnius, hereby discloses how it complies with the Corporate Governance Code for the Companies listed on Nasdaq Vilnius as well as its specific provisions or recommendations. In case of non-compliance with this Code or some of its provisions or recommendations, the specific provisions or recommendations that are not complied with must be indicated and the reasons for such non-compliance must be specified. In addition, other explanatory information indicated in this form must be provided.

Summary of the Corporate Governance Report

The bodies of the Bank include the General Meeting of the Shareholders of the Bank, Council of the Bank, Board of the Bank and Chief Executive Officer. The Supervisory Council consisting of 4 (four) members is elected by the General Meeting of Shareholders. The Management Board consisting of 4 (four) members is appointed by the Supervisory Council. Chief Executive Officer is assigned by the Management Board.

The Risk Management, Audit, and Loan Committees are formed within the Bank. The functions, procedures of formation and the policy of activities of these committees are defined by the legal acts of the Republic of Lithuania, legal acts of the Bank of Lithuania as well as provisions of the certain committees approved by the Management Board or Supervisory Council of the Bank.

More information on the Bank's management, the shareholders' rights, the Supervisory Council, the Management Board, Chief Executive Officer and committees' performance as well as the Bank's internal control and risk management are disclosed in the consolidated annual report.

PRINCIPLES/ RECOMMENDATIONS	YES/NO/ NOT APPLICABLE	COMMENTARY
Principle 1: General meeting of shareholders, equitable treatment of shareholders, and shareholders' rights **The corporate governance framework should ensure the equitable treatment of all shareholders. The corporate governance framework should protect the rights of shareholders.**		
1.1 All shareholders should be provided with access to the information and/or documents established in the legal acts on equal terms. All shareholders should be furnished with equal opportunity to participate in the decision-making process where significant corporate matters are discussed.	Yes	
1.2. It is recommended that the company's capital should consist only of the shares that grant the same rights to voting, ownership, dividend and other rights to all of their holders.	Yes	
1.3. It is recommended that investors should have access to the information concerning the rights attached to the shares of the new issue or those issued earlier in advance, i.e. before they purchase shares.	Yes	
1.4. Exclusive transactions that are particularly important to the company, such as transfer of all or almost all assets of the company which in principle would mean the transfer of the company, should be subject to approval of the general meeting of shareholders.	Yes	
1.5. Procedures for convening and conducting a general meeting of shareholders should provide shareholders with equal opportunities to participate in the general meeting of shareholders and should not prejudice the rights and interests of shareholders. The chosen venue, date and time of the general meeting of shareholders should not prevent active participation of shareholders at the general meeting. In the notice of the general meeting of shareholders being	Yes/No	Bank acts in accordance with the requirements of Law on Companies act Article 25 Part 4.

convened, the company should specify the last day on which the proposed draft decisions should be submitted at the latest.		
1.6 With a view to ensure the right of shareholders living abroad to access the information, it is recommended, where possible, that documents prepared for the general meeting of shareholders in advance should be announced publicly not only in Lithuanian language but also in English and/or other foreign languages in advance. It is recommended that the minutes of the general meeting of shareholders after the signing thereof and/or adopted decisions should be made available publicly not only in Lithuanian language but also in English and/or other foreign languages. It is recommended that this information should be placed on the website of the company. Such documents may be published to the extent that their public disclosure is not detrimental to the company or the company's commercial secrets are not revealed.	Yes	
1.7. Shareholders who are entitled to vote should be furnished with the opportunity to vote at the general meeting of shareholders both in person and in absentia. Shareholders should not be prevented from voting in writing in advance by completing the general voting ballot.	Yes	
1.8. With a view to increasing the shareholders' opportunities to participate effectively at general meetings of shareholders, it is recommended that companies should apply modern technologies on a wider scale and thus provide shareholders with the conditions to participate and vote in general meetings of shareholders via electronic means of communication. In such cases the security of transmitted information must be ensured and it must be possible to identify the participating and voting person.	No	Bank has 3 shareholders, therefore all remote voting issues are solved by voting in advance via post service.
1.9. It is recommended that the notice on the draft decisions of the general meeting of shareholders being convened should specify new candidatures of members of the collegial body, their proposed remuneration and the proposed audit company if these issues are included into the agenda of the general meeting of shareholders. Where it is proposed to elect a new member of the collegial body, it is recommended that the information about his/her educational background, work experience and other managerial positions held (or proposed) should be provided.	Yes/No	Information on the candidates to the Supervisory Council is provided before the shareholders' meeting if the members are suggested in advance. During the meeting the members to the Supervisory Council introduce information on them required by laws and answer the shareholders' questions before voting. Eligibility of the member to be elected to the Supervisory Council is assessed by the Bank of Lithuania. The Bank's annual and interim reports include the updated information on the collegial bodies' members' education, professional experience and current position.
1.10. Members of the company's collegial management body, heads of the administration or other competent persons related to the company who can provide information related to the agenda of the general meeting of shareholders should take part in the general meeting of shareholders. Proposed candidates to member of the collegial body should also participate in the general meeting of	Yes	Bank acts in accordance with the requirements of Law on Companies act Article 21 Part 2.

shareholders in case the election of new members is included into the agenda of the general meeting of shareholders.		
Principle 2: Supervisory board **2.1 Functions and liability of the supervisory board** **The supervisory board of the company should ensure representation of the interests of the company and its shareholders, accountability of this body to the shareholders and objective monitoring of the company's operations and its management bodies as well as constantly provide recommendations to the management bodies of the company.** **The supervisory board should ensure the integrity and transparency of the company's financial accounting and control system.**		
2.1.1. Members of the supervisory board should act in good faith, with care and responsibility for the benefit and in the interests of the company and its shareholders and represent their interests, having regard to the interests of employees and public welfare.	Yes	
2.1.2 Where decisions of the supervisory board may have a different effect on the interests of the company's shareholders, the supervisory board should treat all shareholders impartially and fairly. It should ensure that shareholders are properly informed about the company's strategy, risk management and control, and resolution of conflicts of interest.	Yes	
2.1.3. The supervisory board should be impartial in passing decisions that are significant for the company's operations and strategy. Members of the supervisory board should act and pass decisions without an external influence from the persons who elected them.	Yes	
2.1.4 Members of the supervisory board should clearly voice their objections in case they believe that a decision of the supervisory board is against the interests of the company. Independent members of the supervisory board should: a) maintain independence of their analysis and decision-making; b) not seek or accept any unjustified privileges that might compromise their independence.	Yes	
2.1.5 The supervisory board should oversee that the company's tax planning strategies are designed and implemented in accordance with the legal acts in order to avoid faulty practice that is not related to the long-term interests of the company and its shareholders, which may give rise to reputational, legal or other risks.	Yes	
2.1.6. The company should ensure that the supervisory board is provided with sufficient resources (including financial ones) to discharge their duties, including the right to obtain all the necessary information or to seek independent professional advice from external legal, accounting or other experts on matters pertaining to the competence of the supervisory board and its committees.	Yes	

2.2 Formation of the supervisory board **The procedure of the formation of the supervisory board should ensure proper resolution of conflicts of interest and effective and fair corporate governance.**		
2.2.1. The members of the supervisory board elected by the general meeting of shareholders should collectively ensure the diversity of qualifications, professional experience and competences and seek for gender equality. With a view to maintain a proper balance between the qualifications of the members of the supervisory board, it should be ensured that members of the supervisory board, as a whole, should have diverse knowledge, opinions and experience to duly perform their tasks.	Yes	
2.2.2. Members of the supervisory board should be appointed for a specific term, subject to individual re-election for a new term in office in order to ensure necessary development of professional experience.	Yes	
2.2.3. Chair of the supervisory board should be a person whose current or past positions constituted no obstacle to carry out impartial activities. A former manager or management board member of the company should not be immediately appointed as chair of the supervisory board either. Where the company decides to depart from these recommendations, it should provide information on the measures taken to ensure impartiality of the supervision.	Yes	
2.2.4. Each member should devote sufficient time and attention to perform his duties as a member of the supervisory board. Each member of the supervisory board should undertake to limit his other professional obligations (particularly the managing positions in other companies) so that they would not interfere with the proper performance of the duties of a member of the supervisory board. Should a member of the supervisory board attend less than a half of the meetings of the supervisory board throughout the financial year of the company, the shareholders of the company should be notified thereof.	Yes	
2.2.5. When it is proposed to appoint a member of the supervisory board, it should be announced which members of the supervisory board are deemed to be independent. The supervisory board may decide that, despite the fact that a particular member meets all the criteria of independence, he/she cannot be considered independent due to special personal or company-related circumstances.	Yes	Information on the candidates to the Supervisory Council is provided before the shareholders' meeting if the members are suggested in advance. During the meeting the members to the Supervisory Council introduce information on them required by laws and answer the shareholders' questions before voting. Eligibility of the member to be elected to the Supervisory Council is assessed by the Bank of Lithuania. The Bank's annual and interim reports include the updated information on the collegial bodies' members' education,

		professional experience and current position.
2.2.6. The amount of remuneration to members of the supervisory board for their activity and participation in meetings of the supervisory board should be approved by the general meeting of shareholders.	Yes	
2.2.7. Every year the supervisory board should carry out an assessment of its activities. It should include evaluation of the structure of the supervisory board, its work organization and ability to act as a group, evaluation of the competence and work efficiency of each member of the supervisory board, and evaluation whether the supervisory board has achieved its objectives. The supervisory board should, at least once a year, make public respective information about its internal structure and working procedures.	Yes	
Principle 3: Management Board **3.1 Functions and liability of the management board** **The management board should ensure the implementation of the company's strategy and good corporate governance with due regard to the interests of its shareholders, employees and other interest groups.**		
3.1.1 The management board should ensure the implementation of the company's strategy approved by the supervisory board if the latter has been formed at the company. In such cases where the supervisory board is not formed, the management board is also responsible for the approval of the company's strategy.	Yes	
3.1.2. As a collegial management body of the company, the management board performs the functions assigned to it by the Law and in the articles of association of the company, and in such cases where the supervisory board is not formed in the company, it performs inter alia the supervisory functions established in the Law. By performing the functions assigned to it, the management board should take into account the needs of the company's shareholders, employees and other interest groups by respectively striving to achieve sustainable business development.	Yes	
3.1.3. The management board should ensure compliance with the laws and the internal policy of the company applicable to the company or a group of companies to which this company belongs. It should also establish the respective risk management and control measures aimed at ensuring regular and direct liability of managers.	Yes	
3.1.4 Moreover, the management board should ensure that the measures included into the **OECD Good Practice Guidance** on Internal Controls, Ethics and Compliance are applied at the company in order to ensure adherence to the applicable laws, rules and standards.	Yes/No	Internal Control procedures on Ethics and Compliance during year 2019 will be adopted to comply with OECD requirements
3.1.5 When appointing the manager of the company, the management board should take into account the appropriate balance between the candidate's qualifications, experience and competence.	Yes	

3.2. Formation of the management board		
3.2.1 The members of the management board elected by the supervisory board or, if the supervisory board is not formed, by the general meeting of shareholders should collectively ensure the required diversity of qualifications, professional experience and competences and seek for gender equality. With a view to maintain a proper balance in terms of the current qualifications possessed by the members of the management board, it should be ensured that the members of the management board would have, as a whole, diverse knowledge, opinions and experience to duly perform their tasks.	Yes	
3.2.2 Names and surnames of the candidates to become members of the management board, information on their educational background, qualifications, professional experience, current positions, other important professional obligations and potential conflicts of interest should be disclosed without violating the requirements of the legal acts regulating the handling of personal data at the meeting of the supervisory board in which the management board or individual members of the management board are elected. In the event that the supervisory board is not formed, the information specified in this paragraph should be submitted to the general meeting of shareholders. The management board should, on yearly basis, collect data provided in this paragraph on its members and disclose it in the company's annual report.	Yes	
3.2.3 All new members of the management board should be familiarized with their duties and the structure and operations of the company.	Yes	
3.2.4 Members of the management board should be appointed for a specific term, subject to individual re-election for a new term in office in order to ensure necessary development of professional experience and sufficiently frequent reconfirmation of their status.	Yes	
3.2.5 Chair of the management board should be a person whose current or past positions constitute no obstacle to carry out impartial activity. Where the supervisory board is not formed, the former manager of the company should not be immediately appointed as chair of the management board. When a company decides to depart from these recommendations, it should furnish information on the measures it has taken to ensure the impartiality of supervision.	Yes	
3.2.6 Each member should devote sufficient time and attention to perform his duties as a member of the management board. Should a member of the management board attend less than a half of the meetings of the management board throughout the financial year of the company, the supervisory board of the company or, if the supervisory board is not formed at the company, the general meeting of shareholders should be notified thereof.	Yes	
3.2.7 In the event that the management board is elected in the cases established by the Law where the supervisory board is not formed at the company, and some of its members will be independent, it should be announced which members of the management board are deemed as independent. The management board may decide that, despite the fact that a particular member meets all the criteria of independence established by the Law, he/she cannot be considered independent due to special personal or company-related circumstances.	Not Applicable	
3.2.8 The general meeting of shareholders of the company should approve the amount of remuneration to the members of the management board for their activity and participation in the meetings of the management board.	No	Supervisory board approves the amount of remuneration to the members of the management board for their activity and participation in the meetings of the management board.

3.2.9. The members of the management board should act in good faith, with care and responsibility for the benefit and the interests of the company and its shareholders with due regard to other stakeholders. When adopting decisions, they should not act in their personal interest; they should be subject to no-compete agreements and they should not use the business information or opportunities related to the company's operations in violation of the company's interests.	Yes	
3.2.10. Every year the management board should carry out an assessment of its activities. It should include evaluation of the structure of the management board, its work organization and ability to act as a group, evaluation of the competence and work efficiency of each member of the management board, and evaluation whether the management board has achieved its objectives. The management board should, at least once a year, make public respective information about its internal structure and working procedures in observance of the legal acts regulating the processing of personal data.	Yes/No	Board's annual activities assessment report, according to Lithuanian law legislation should be provided to the Bank of Lithuania and other parties.
Principle 4: Rules of procedure of the supervisory board and the management board of the company **The rules of procedure of the supervisory board, if it is formed at the company, and of the management board should ensure efficient operation and decision-making of these bodies and promote active cooperation between the company's management bodies.**		
4.1. The management board and the supervisory board, if the latter is formed at the company, should act in close cooperation in order to attain benefit for the company and its shareholders. Good corporate governance requires an open discussion between the management board and the supervisory board. The management board should regularly and, where necessary, immediately inform the supervisory board about any matters significant for the company that are related to planning, business development, risk management and control, and compliance with the obligations at the company. The management board should inform he supervisory board about any derogations in its business development from the previously formulated plans and objectives by specifying the reasons for this.	Yes	
4.2. It is recommended that meetings of the company's collegial bodies should be held at the respective intervals, according to the pre-approved schedule. Each company is free to decide how often meetings of the collegial bodies should be convened but it is recommended that these meetings should be convened at such intervals that uninterruptable resolution of essential corporate governance issues would be ensured. Meetings of the company's collegial bodies should be convened at least once per quarter.	Yes	
4.3. Members of a collegial body should be notified of the meeting being convened in advance so that they would have sufficient time for proper preparation for the issues to be considered at the meeting and a fruitful discussion could be held and appropriate decisions could be adopted. Along with the notice of the meeting being convened all materials relevant to the issues on the agenda of the meeting should be submitted to the members of the collegial body. The agenda of the meeting should not be changed or supplemented during the meeting, unless all members of the collegial body present at the meeting agree with such change or supplement to the agenda, or certain issues that are important to the company require immediate resolution.	Yes	

4.4. In order to coordinate the activities of the company's collegial bodies and ensure effective decision-making process, the chairs of the company's collegial supervision and management bodies should mutually agree on the dates and agendas of the meetings and close cooperate in resolving other matters related to corporate governance. Meetings of the company's supervisory board should be open to members of the management board, particularly in such cases where issues concerning the removal of the management board members, their responsibility or remuneration are discussed.	Yes	

Principle 5: Nomination, remuneration and audit committees

5.1 Purpose and formation of committees

The committees formed at the company should increase the work efficiency of the supervisory board or, where the supervisory board is not formed, of the management board which performs the supervisory functions by ensuring that decisions are based on due consideration and help organise its work in such a way that the decisions it takes would be free of material conflicts of interest.

Committees should exercise independent judgment and integrity when performing their functions and provide the collegial body with recommendations concerning the decisions of the collegial body. However, the final decision should be adopted by the collegial body.

5.1.1. Taking due account of the company-related circumstances and the chosen corporate governance structure, the supervisory board of the company or, in cases where the supervisory board is not formed, the management board which performs the supervisory functions, establishes committees. It is recommended that the collegial body should form the nomination, remuneration and audit committees	Yes/No	In accordance with the requirements of Law on Banks Article 36 Part 1, UAB Medicinos bankas is not treated as bank that is significant in terms of its size, internal organisation and the nature, scope and the complexity of its activities, therefore it is not obligatory to create nomination and remuneration committees.
5.1.2. Companies may decide to set up less than three committees. In such case companies should explain in detail why they have chosen the alternative approach, and how the chosen approach corresponds with the objectives set for the three different committees.	Not Applicable	
5.1.3. In the cases established by the legal acts the functions assigned to the committees formed at companies may be performed by the collegial body itself. In such case the provisions of this Code pertaining to the committees (particularly those related to their role, operation and transparency) should apply, where relevant, to the collegial body as a whole.	Yes	
5.1.4. Committees established by the collegial body should normally be composed of at least three members. Subject to the requirements of the legal acts, committees could be comprised only of two members as well. Members of each committee should be selected on the basis of their competences by giving priority to independent members of the collegial body. The chair of the management board should not serve as the chair of committees.	Yes	
5.1.5. The authority of each committee formed should be determined by the collegial body itself. Committees should perform their duties according to the authority delegated to them and regularly inform the collegial body about their activities and performance on a regular basis. The authority of each committee defining its role and specifying its rights and duties should be made public at least once a year (as part of the information disclosed by the company on its governance structure and practice on an annual basis). In compliance with the legal acts regulating the processing of personal data, companies should also include in their annual reports the statements of the existing committees on their composition, the number of meetings and attendance over the year as well as the main directions of their activities and performance.	Yes/No	The authority delegated to the Committee as well as its reporting are set in the Committees' provisions approved by the Supervisory Council. Information regarding the functions and composition of the Committees are declared in the Bank's annual report. However, information regarding the number of committee meetings and participation of the committee members is not declared there.

5.1.6. With a view to ensure the independence and impartiality of the committees, the members of the collegial body who are not members of the committees should normally have a right to participate in the meetings of the committee only if invited by the committee. A committee may invite or request that certain employees of the company or experts would participate in the meeting. Chair of each committee should have the possibility to maintain direct communication with the shareholders. Cases where such practice is to be applied should be specified in the rules regulating the activities of the committee.	Yes	
5.2 Nomination committee		
5.2.1. The key functions of the nomination committee should be the following: 1) to select candidates to fill vacancies in the membership of supervisory and management bodies and the administration and recommend the collegial body to approve them. The nomination committee should evaluate the balance of skills, knowledge and experience in the management body, prepare a description of the functions and capabilities required to assume a particular position and assess the time commitment expected; 2) assess, on a regular basis, the structure, size and composition of the supervisory and management bodies as well as the skills, knowledge and activity of its members, and provide the collegial body with recommendations on how the required changes should be sought; 3) devote the attention necessary to ensure succession planning.	Not Applicable	
5.2.2. When dealing with issues related to members of the collegial body who have employment relationships with the company and the heads of the administration, the manager of the company should be consulted by granting him/her the right to submit proposals to the Nomination Committee.	Not Applicable	
5.3 Remuneration committee		
The main functions of the remuneration committee should be as follows: 1) submit to the collegial body proposals on the remuneration policy applied to members of the supervisory and management bodies and the heads of the administration for approval. Such policy should include all forms of remuneration, including the fixed-rate remuneration, performance-based remuneration, financial incentive schemes, pension arrangements and termination payments as well as conditions which would allow the company to recover the amounts or suspend the payments by specifying the circumstances under which it would be expedient to do so; 2) submit to the collegial body proposals regarding individual remuneration for members of the collegial bodies and the heads of the administration in order to ensure that they would be consistent with the company's remuneration policy and the evaluation of the performance of the persons concerned; 3) review, on a regular basis, the remuneration policy and its implementation.	Not Applicable	
5.4 Audit committee 5.4.1. The key functions of the audit committee are defined in the legal acts regulating the activities of the audit committee	 Yes	

5.4.2. All members of the committee should be provided with detailed information on specific issues of the company's accounting system, finances and operations. The heads of the company's administration should inform the audit committee about the methods of accounting for significant and unusual transactions where the accounting may be subject to different approaches.	Yes	
5.4.3. The audit committee should decide whether the participation of the chair of the management board, the manager of the company, the chief finance officer (or senior employees responsible for finance and accounting), the internal and external auditors in its meetings is required (and, if required, when). The committee should be entitled, when needed, to meet the relevant persons without members of the management bodies present.	Yes	
5.4.4. The audit committee should be informed about the internal auditor's work program and should be furnished with internal audit reports or periodic summaries. The audit committee should also be informed about the work program of external auditors and should receive from the audit firm a report describing all relationships between the independent audit firm and the company and its group.	Yes	
5.4.5. The audit committee should examine whether the company complies with the applicable provisions regulating the possibility of lodging a complaint or reporting anonymously his/her suspicions of potential violations committed at the company and should also ensure that there is a procedure in place for proportionate and independent investigation of such issues and appropriate follow-up actions.	Yes	
5.4.6. The audit committee should submit to the supervisory board or, where the supervisory board is not formed, to the management board its activity report at least once in every six months, at the time that annual and half-yearly reports are approved.	Yes/No	The audit committee submits annual activity reports and this complies with annual the Bank's reporting cycle.
Principle 6: Prevention and disclosure of conflicts of interest **The corporate governance framework should encourage members of the company's supervisory and management bodies to avoid conflicts of interest and ensure a transparent and effective mechanism of disclosure of conflicts of interest related to members of the supervisory and management bodies**		
Any member of the company's supervisory and management body should avoid a situation where his/her personal interests are or may be in conflict with the company's interests. In case such a situation did occur, a member of the company's supervisory or management body should, within a reasonable period of time, notify other members of the same body or the body of the company which elected him/her or the company's shareholders of such situation of a conflict of interest, indicate the nature of interests and, where possible, their value.	Yes	
Principle 7: Remuneration policy of the company **The remuneration policy and the procedure for review and disclosure of such policy established at the company should prevent potential conflicts of interest and abuse in determining remuneration of members of the collegial bodies and heads of the administration, in addition it should ensure the publicity and transparency of the company's remuneration policy and its long-term strategy.**		
7.1. The company should approve and post the remuneration policy on the website of the company; such policy should be reviewed on a regular basis and be consistent with the company's long-term strategy.	Yes	

7.2. The remuneration policy should include all forms of remuneration, including the fixed-rate remuneration, performance-based remuneration, financial incentive schemes, pension arrangements and termination payments as well as the conditions specifying the cases where the company can recover the disbursed amounts or suspend the payments.	Yes	
7.3. With a view to avoid potential conflicts of interest, the remuneration policy should provide that members of the collegial bodies which perform the supervisory functions should not receive remuneration based on the company's performance.	Yes/No	Banks remuneration policy relates with sustainable banks financial results, i.e. in case there is variable remuneration bigger than 3000 euros, this remuneration would be divided into parts and would be paid during 3 years period with link to banks financial results in the future.
7.4. The remuneration policy should provide sufficient information on the policy regarding termination payments. Termination payments should not exceed a fixed amount or a fixed number of annual wages and in general should not be higher than the non-variable component of remuneration for two years or the equivalent thereof. Termination payments should not be paid if the contract is terminated due to inadequate performance.	Yes	
7.5. In the event that the financial incentive scheme is applied at the company, the remuneration policy should contain sufficient information about the retention of shares after the award thereof. Where remuneration is based on the award of shares, shares should not be vested at least for three years after the award thereof. After vesting, members of the collegial bodies and heads of the administration should retain a certain number of shares until the end of their term in office, subject to the need to compensate for any costs related to the acquisition of shares.	Not Applicable	
7.6. The company should publish information about the implementation of the remuneration policy on its website, with a key focus on the remuneration policy in respect of the collegial bodies and managers in the next and, where relevant, subsequent financial years. It should also contain a review of how the remuneration policy was implemented during the previous financial year. The information of such nature should not include any details having a commercial value. Particular attention should be paid on the major changes in the company's remuneration policy, compared to the previous financial year.	Yes/No	The report of the Remuneration policy is prepared according to the requirements set by the resolution of the Board of the Bank of Lithuania. Information regarding implementation of the Remuneration policy is provided in the annual report and interim reports in the scope set by the valid requirements.
7.7. It is recommended that the remuneration policy or any major change of the policy should be included on the agenda of the general meeting of shareholders. The schemes under which members and employees of a collegial body receive remuneration in shares or share options should be approved by the general meeting of shareholders.	Yes/No	Supervisory board approves the Banks remuneration policy.
Principle 8: Role of stakeholders in corporate governance **The corporate governance framework should recognize the rights of stakeholders entrenched in the laws or mutual agreements and encourage active cooperation between companies and stakeholders in creating the company value, jobs and financial sustainability. In the context of this principle the concept "stakeholders" includes investors, employees, creditors, suppliers, clients, local community and other persons having certain interests in the company concerned.**		
8.1. The corporate governance framework should ensure that the rights and lawful interests of stakeholders are protected.	Yes	

(All amounts in EUR thousand unless otherwise stated)

8.2. The corporate governance framework should create conditions for stakeholders to participate in corporate governance in the manner prescribed by law. Examples of participation by stakeholders in corporate governance include the participation of employees or their representatives in the adoption of decisions that are important for the company, consultations with employees or their representatives on corporate governance and other important matters, participation of employees in the company's authorized capital, involvement of creditors in corporate governance in the cases of the company's insolvency, etc.	Yes	
8.3. Where stakeholders participate in the corporate governance process, they should have access to relevant information.	Yes	
8.4. Stakeholders should be provided with the possibility of reporting confidentially any illegal or unethical practices to the collegial body performing the supervisory function.	Yes/No	Reports regarding illegal or unethical practices are provided to management board.
Principle 9: Disclosure of information **The corporate governance framework should ensure the timely and accurate disclosure of all material corporate issues, including the financial situation, operations and governance of the company.**		
9.1. In accordance with the company's procedure on confidential information and commercial secrets and the legal acts regulating the processing of personal data, the information publicly disclosed by the company should include but not be limited to the following:		
9.1.1. operating and financial results of the company;	Yes	
9.1.2. objectives and non-financial information of the company;	Yes	
9.1.3. persons holding a stake in the company or controlling it directly and/or indirectly and/or together with related persons as well as the structure of the group of companies and their relationships by specifying the final beneficiary;	Yes	
9.1.4. members of the company's supervisory and management bodies who are deemed independent, the manager of the company, the shares or votes held by them at the company, participation in corporate governance of other companies, their competence and remuneration;	Yes/No	The Bank of Lithuania is informed according to the requirements of Lithuanian laws.
9.1.5 reports from existing committees on their composition, number of meetings and attendance at meetings in the previous year, as well as on their main activities and performance;	Yes/No	Reports of the existing committees is provided to management or supervisory boards
9.1.6. potential key risk factors, the company's risk management and supervision policy;	Yes	
9.1.7. the company's transactions with related parties;	Yes	More information in Note 32
9.1.8. main issues related to employees and other stakeholders (for instance, human resource policy, participation of employees in corporate governance, award of the company's shares or share options as incentives, relationships with creditors, suppliers, local community, etc.);	Yes	
9.1.9. structure and strategy of corporate governance;	Yes	
9.1.10 initiatives and measures of social responsibility policy and anti-corruption fight, significant current or planned investment projects. This list is deemed minimum and companies are encouraged not to restrict themselves to the disclosure of information included into this list. This principle of the Code does not exempt companies from their obligation to disclose information as provided for in the applicable legal acts.	Yes	

(All amounts in EUR thousand unless otherwise stated)

9.2. When disclosing the information specified in paragraph 9.1.1 of recommendation 9.1, it is recommended that the company which is a parent company in respect of other companies should disclose information about the consolidated results of the whole group of companies.	Yes	
9.3. When disclosing the information specified in paragraph 9.1.4 of recommendation 9.1, it is recommended that the information on the professional experience and qualifications of members of the company's supervisory and management bodies and the manager of the company as well as potential conflicts of interest which could affect their decisions should be provided. It is further recommended that the remuneration or other income of members of the company's supervisory and management bodies and the manager of the company should be disclosed, as provided for in greater detail in Principle 7.	Yes	
9.4. Information should be disclosed in such manner that no shareholders or investors are discriminated in terms of the method of receipt and scope of information. Information should be disclosed to all parties concerned at the same time.	Yes	
Principle 10: Selection of the company's audit firm **The company's audit firm selection mechanism should ensure the independence of the report and opinion of the audit firm.**		
10.1. With a view to obtain an objective opinion on the company's financial condition and financial results, the company's annual financial statements and the financial information provided in its annual report should be audited by an independent audit firm.	Yes	
10.2. It is recommended that the audit firm would be proposed to the general meeting of shareholders by the supervisory board or, if the supervisory board is not formed at the company, by the management board of the company.	Yes	
10.3 In the event that the audit firm has received remuneration from the company for the non-audit services provided, the company should disclose this publicly. This information should also be available to the supervisory board or, if the supervisory board is not formed at the company, by the management board of the company when considering which audit firm should be proposed to the general meeting of shareholders.	Yes	

EVALUATION OF INTERNAL CONTROL

Depending on the risk appetite acceptable to the Bank, risk management principles are developed and implemented throughout the Group. Risk management principles are governed by the Bank's Group Risk Management Policy.

The Group's remuneration policy is an integral part of the Bank's risk management system. The remuneration policy is coordinated with the Bank's business strategy, assumed by the risk level, the Bank's goals, values and long-term vision.

The Bank's internal control system is an integral and continuous part of its daily activities. All employees of the Bank are responsible at the appropriate level for the functioning of the Bank's internal control processes, and each employee participates in the internal control system and can influence it.

Internal control aims to ensure the legality, economy, efficiency, effectiveness and transparency of the Bank's operations, implementation of strategic and other business plans, asset protection, reliability and completeness of information and reporting, compliance with contractual and other obligations to third parties and management of all risk factors related thereto.

The Compliance Officer and other compliance Officers are appointed to the Compliance function in the Bank, who perform their functions independently. For the Compliance in the Bank, i.e. that all the Bank's employees performance comply with the Bank's laws and regulations are also responsible all employees of the Bank, who are involved in the internal control system during performance of their functions.

The Bank's internal control system, risk management and compliance assessment are performed by the Bank's Internal Audit Division. This unit shall inform the Bank's Internal Audit Committee and the Bank's Management Board of any deficiencies or violations noted.

5 March 2019

Acting Chairman of the Board and Chief Executive Officer Dalia Klišauskienė

(All amounts in EUR thousand unless otherwise stated)

SEPARATE AND CONSOLIDATED STATEMENTS OF FINANCIAL POSITION

The Group				The Bank	
31 December 2018	**31 December 2017**	**Assets**	**Notes**	**31 December 2018**	**31 December 2017**
		Cash and due from central bank			
27,304	*24,478*	*Cash*		*27,304*	*24,478*
30,070	*29,042*	*Placements with the central bank*	5	*30,070*	*29,042*
57,374	53,520			57,374	53,520
13,280	11,539	Placements with banks and other credit institutions	6	13,239	11,496
		Financial assets at fair value through profit or loss			
41	*7*	*Derivative financial instruments*	14	*41*	*7*
41	*7*			*41*	*7*
70,746	39,860	Debt securities	7	70,746	39,860
		Loans and receivables			
159,017	*151,839*	*Loans to customers*	*8*	*156,986*	*151,615*
12,809	*11,839*	*Finance lease receivable*	*8*	*12,809*	*11,839*
171,826	163,678			169,795	163,454
-	-	Investments in subsidiaries	12	7,521	6,439
3,018	6,213	Investment property	11	1,050	1,370
5,548	5,343	Property and equipment	9	5,545	5,338
314	264	Intangible assets	10	267	243
		Tax assets			
6	15	*Current taxes*		6	15
1,925	*1,897*	*Deferred taxes*	29	*1,925*	*1,897*
1,931	1,912			1,931	1,912
685	2,849	Other assets	13	621	2,529
324,763	**285,185**	**Total assets**		**328,130**	**286,168**

(continued on the next page)

The accompanying notes on pages 40 to 124 are an integral part of these financial statements.

(All amounts in EUR thousand unless otherwise stated)

SEPARATE AND CONSOLIDATED STATEMENTS OF FINANCIAL POSITION (CONT'D)

The Group				The Bank	
31 December 2018	**31 December 2017**	**Liabilities**	**Notes**	**31 December 2018**	**31 December 2017**
228	3,600	Due to banks and other credit institutions	15	228	3,600
5	31	Derivative financial instruments	14	5	31
289,126	251,855	Due to customers	16	290,733	252,920
1,000	1,000	Subordinated loans	17	1,000	1,000
2,167	-	Debt securities issued	17	2,167	
30	-	Impairment		30	-
1,682	1,258	Other liabilities	18	3,368	1,152
294,238	**257,744**	**Total liabilities**		**297,531**	**258,703**
		Equity			
19,948	19,948	Share capital	19	19,948	19,948
2,064	828	Retained earnings		2,138	852
335	339	Revaluation reserve of property and equipment	19	335	339
8,178	6,326	Other reserves	19	8,178	6,326
30,525	**27,441**	**Total shareholders' equity**		**30,599**	**27,465**
324,763	**285,185**	**Total liabilities and shareholders' equity**		**328,130**	**286,168**

The accompanying notes on pages 40 to 124 are an integral part of these financial statements. The financial statements were authorised for issue on 5 March 2019. These financial statements were signed on behalf of the Bank by:

Acting Chairman of the Board and Chief Executive Officer	D. Klišauskienė	
Director of Accounting and Reporting Department, Chief Accountant	A. Tonkich	

(All amounts in EUR thousand unless otherwise stated)

SEPARATE AND CONSOLIDATED INCOME STATEMENTS

The Group				The Bank	
2018	**2017**		**Notes**	**2018**	**2017**
9,243	8,224	Interest income	21	9,113	8,161
(1,742)	(1,558)	Interest expenses	21	(1,742)	(1,558)
7,501	**6,666**	**Net interest income**		**7,371**	**6,603**
5,674	3,742	Service fee and commission income	22	5,675	3,746
(435)	(450)	Service fee and commission expenses	22	(411)	(435)
5,239	**3,292**	**Net service fee and commission income**		**5,264**	**3,311**
-	-	Net result on equity securities trading		-	(29)
-	9	Net result on securities trading	23	-	9
4,664	3,822	Net foreign exchange gain	24	4,664	3,822
33	100	Net result from operations with derivatives	14	33	100
-	-	Impairment of investments into subsidiaries	12	(1,119)	(1,140)
(993)	(974)	Net result on operations on investment property	11, 25	(275)	(56)
169	333	Other income	26	126	186
16,613	**13,248**	**Total operating income**		**16,064**	**12,806**
(1,313)	(233)	Impairment of loans and other financial assets	27	(1,308)	(186)
15,300	**13,015**	**Operating income after impairment**		**14,756**	**12,620**
(7,866)	(6,777)	Salaries and benefits	28	(7,566)	(6,618)
(486)	(382)	Depreciation	9	(484)	(382)
(161)	(200)	Amortisation	10	(146)	(190)
(4,412)	(4,023)	Other operating expenses	28	(4,136)	(3,776)
(12,925)	**(11,382)**	**Total operating expenses**		**(12,332)**	**(10,966)**
2,375	**1,633**	**Operating profit (loss)**		**2,424**	**1,654**
11	**(7)**	**Income tax expense**	29	**11**	**(7)**
2,386	**1,626**	**Profit (loss) for the year**		**2,435**	**1,647**
2,386	**1,626**	**Attributable to equity holders of the Bank**		**2,435**	**1,647**

The accompanying notes on pages 40 to 124 are an integral part of these financial statements. The financial statements were authorised for issue on 5 March 2019. These financial statements were signed on behalf of the Bank by:

Acting Chairman of the Board and Chief Executive Officer	D. Klišauskienė	
Director of Accounting and Reporting Department, Chief Accountant	A. Tonkich	

(All amounts in EUR thousand unless otherwise stated)

SEPARATE AND CONSOLIDATED STATEMENTS OF COMPREHENSIVE INCOME

The Bank

	2018	2017
Items that will never be reclassified to profit or loss		
Change in PPE revaluation	5	5
Transfer of depreciation for PPE net of tax	(4)	(4)
Other		-
Items that are or may be reclassified to profit or loss	**1**	**1**
Net amount transferred to profit or loss (available-for-sale financial assets)	-	-
Related tax	-	-
Other comprehensive income (expenses), net of tax	**1**	**1**
Profit for the year	2,435	1,647
Total comprehensive income	**2,436**	**1,648**
Attributable to:		
Equity holders of the Bank	**2,436**	**1 648**

The Group

	2018	2017
Items that will never be reclassified to profit or loss		
Change in PPE revaluation	4	4
Transfer of depreciation for PPE net of tax	(4)	(4)
Other	-	-
Items that are or may be reclassified to profit or loss	**-**	-
Related tax	-	-
Other comprehensive income (expenses), net of tax	**-**	-
Profit for the year	2,386	1,626
Total comprehensive income	**2,386**	**1,626**
Attributable to:		
Equity holders of the Bank	**2,386**	**1,626**

The accompanying notes on pages 40 to 124 are an integral part of these financial statements. The financial statements were authorised for issue on 5 March 2019. These financial statements were signed on behalf of the Bank by:

Acting Chairman of the Board and Chief Executive Officer	D. Klišauskienė	
Director of Accounting and Reporting Department, Chief Accountant	A. Tonkich	

(All amounts in EUR thousand unless otherwise stated)

SEPARATE AND CONSOLIDATED STATEMENTS OF CHANGES IN EQUITY

The Bank

	Note	Share capital	Retained earnings (restated)	Revaluation reserve of property and equipment	Financial assets revaluation reserve	Other reserves	Total
At 1 January 2017		**19,948**	**283**	**343**	**-**	**5,243**	**25,817**
Profit or loss		-	1,647	-	-	-	**1,647**
Other comprehensive income (expenses)		-	5	(4)	-	-	**1**
Transactions with owners of the Bank							
Transfer to reserves		-	(1,083)	-	-	1,083	**-**
At 31 December 2017		**19,948**	**852**	**339**	**-**	**6,326**	**27,465**
Impact of change in accounting principles	2	-	(302)	-	-	-	(302)
At 1 January 2018		**19,948**	**550**	**339**		**6,326**	**27,163**
Profit or loss		-	2,435	-	-	-	**2,345**
Other comprehensive income (expenses)		-	5	(4)	-	-	**1**
Transactions with owners of the Bank							
Transfer to reserves	19	-	(852)	-	-	1,852	**1,000**
At 31 December 2018		**19,948**	**2,138**	**335**	**-**	**8,178**	**30,599**

(continued on the next page)

The accompanying notes on pages 40 to 124 are an integral part of these financial statements.

(All amounts in EUR thousand unless otherwise stated)

SEPARATE AND CONSOLIDATED STATEMENTS OF CHANGES IN EQUITY (CONT'D)

The Group

	Note	Share capital	Retained earnings (restated)	Revaluation reserve of property and equipment	Financial assets revaluation reserve	Other reserves	Total
At 1 January 2017		**19,948**	**281**	**343**	**-**	**5,243**	**25,815**
Profit or loss		-	1,646	-	-	-	**1,646**
Other comprehensive income (expenses)		-	4	(4)	-	-	**-**
Transactions with owners of the Bank							
Transfer to reserves		-	(1,083)	-	-	1,083	**-**
At 31 December 2017		**19,948**	**828**	**339**	**-**	**6,326**	**27,441**
Impact of change in accounting principles	2	-	(302)	-	-	-	(302)
At 1 January 2018		**19,948**	**526**	**339**	**-**	**6,326**	**27,139**
Profit or loss		-	2,386	-	-	-	**2,386**
Other comprehensive income (expenses)		-	4	(4)	-	-	**-**
Transactions with owners of the Bank							
Transfer to reserves	19	-	(852)	-	-	1,852	**1,000**
At 31 December 2018		**19,948**	**2,064**	**335**	**-**	**8,178**	**30,525**

The accompanying notes on pages 40 to 124 are an integral part of these financial statements. The financial statements were authorised for issue on 5 March 2019. These financial statements were signed on behalf of the Bank by:

Acting Chairman of the Board and Chief Executive Officer	D. Klišauskienė	
Director of Accounting and Reporting Department, Chief Accountant	A. Tonkich	

(All amounts in EUR thousand unless otherwise stated)

SEPARATE AND CONSOLIDATED CASH FLOW STATEMENTS

The Group				The Bank	
2018	**2017**		**Notes**	**2018**	**2017**
		Cash flows from operating activities			
2,386	1,626	Profit (loss) for the year		2,435	1,647
		Non-cash Revenue and Cost Recovery:			
647	582	Depreciation and amortisation	9,10	630	572
(129)	158	Loss, gain on the sale of tangible, intangible and investment property		42	(125)
1,283	233	Impairment of loans	27	1,278	186
-	-	Impairment of investments in subsidiaries	12	1,119	1,140
1,131	680	Impairment of investment property	11,25	242	45
(60)	(35)	Derivatives revaluation	14	(60)	(35)
58	29	Elimination of accrued vacation pay		38	29
(11)	7	Income tax expenses	29	(11)	7
(225)	320	Elimination of other non-cash items		(225)	244
5,080	3,600	Cash flows from (to) operating activities before changes in operating assets and liabilities		5,488	3,710
		Changes in operating assets and liabilities:			
-	7,763	Changes in trading debt securities		-	7,763
(337)	(49)	Changes in compulsory reserves		(337)	(49)
66	(66)	Changes in amounts due from banks		66	(66)
(10,957)	347	Loans to customers		(9,462)	(359)
1,510	(18,295)	Purchased loan portfolio		1,510	(18,295)
(970)	(1,267)	Finance lease receivable		(970)	(1,267)
(3,372)	(835)	Changes in due to banks and other credit institutions		(3,372)	(835)
34,776	19,551	Changes in due to customers		35,318	14,719
2,535	(291)	Changes in other assets and liabilities		2,311	(80)
28,331	10,458	Net cash flows from operating activities before income tax		30,552	5,241
(6)	-	Income tax (paid)		(6)	-
28,325	**10,458**	**Net cash flows from operating activities after income tax**		**30,546**	**5, 241**
		Investing activities			
(1,038)	(1,914)	(Acquisitions) of intangible assets and property and equipment	9,10	(997)	(1,878)
(2)	-	(Acquisitions) of investment property	11	(2)	-
3,263	2,697	Proceeds from sale of tangible, intangible and equipment and investment property		1,423	940
-	-	Investments in subsidiaries		(2,201)	(754)
-	-	Disposal of subsidiaries		-	7,650
-	-	Advances on the sale of subsidiaries		1,781	-
22,526	12,130	Redemption of debt-securities		22,526	12,130
(53,412)	(18,330)	(Acquisitions) of debt-securities		(53,412)	(18,330)
(28,663)	**(5,417)**	**Net cash flows to investing activities**		**(30,882)**	**(242)**

(continued on the next page)

The accompanying notes on pages 40 to 124 are an integral part of these financial statements.

(All amounts in EUR thousand unless otherwise stated)

CONDENSED SEPARATE AND CONSOLIDATED CASH FLOW STATEMENTS (CONT'D)

Group				Bank	
2018	**2017**		**Notes**	**2018**	**2017**
		Financing activities			
1,000	-	Shareholder contributions to increase reserves	19	1,000	-
2,167	-	Bonds issued		2,167	-
-	-	Bonds (redeemed)		-	-
	-	Subordinated loans received			-
9,217	8,907	Loans received		9,217	8,907
(6,640)	(3,412)	Loans (repaid)		(6,640)	(3,412)
5,744	**5,495**	**Net cash flows from (to) financing activities**		**5,744**	**5,495**
(82)	(221)	Effect of exchange rate changes on cash and cash equivalents	24	(82)	(221)
5,324	**10,315**	**Net increase (decrease) in cash and cash equivalents**		**5,326**	**10,273**
63,050	52,735	Cash and cash equivalents at 1 January		63,007	52,734
68,374	**63,050**	**Cash and cash equivalents at 31 December**	30	**68,333**	**63,007**
		Additional information to operating cash flows			
9,742	8,875	Interest received		9,769	8,851
(1,485)	(1,438)	Interest (paid)		(1,485)	(1,435)

The accompanying notes on pages 40 to 124 are an integral part of these financial statements. The financial statements were authorised for issue on 5 March 2019. These financial statements were signed on behalf of the Bank by:

Acting Chairman of the Board and Chief Executive Officer	D. Klišauskienė	
Director of Accounting and Reporting Department, Chief Accountant	A. Tonkich	

(All amounts in EUR thousand unless otherwise stated)

Note 1 Background information

UAB Medicinos Bankas (hereinafter referred to as the Bank) was established on 24 November 1992 (as KB Ancorobank) and on 16 January 1997 was reorganised to UAB Medicinos Bankas. The address of its registered office is as follows:

Paměnkalnio St. 40,
Vilnius, Lithuania.

The Bank accepts deposits, grants loans, performs monetary and documentary settlements, exchanges currencies and issues guarantees for its clients. The Bank also trades in securities, provides consulting and custody services. The Bank provides services to both corporate and retail sectors.

The financial statements of the Group include the financial statements of the Bank and its fully owned subsidiaries UAB MB Turtas, UAB MB Valda, UAB MB Investicija, UAB TG Invest-1, SIA Nida Capital (main activity of the companies – real estate management and development) and UAB Saugus Kreditas (main activity of the company – granting of consumer credit to natural persons), which were established on 12 August 2009, 30 November 2009 and 16 December 2011 respectively. UAB TG Invest-1 was bought on 17 May 2013, SIA Nida Capital was established on 31 March 2014, and UAB Saugus Kreditas was acquired 17 October 2017.

As at 31 December 2018 the Bank employed 369 employees (383 employees as at 31 December 2017). As at 31 December 2018 the Group employed 384 employees (396 employees as at 31 December 2017).

As at 31 December 2018 the shareholders of the Bank were as follows:

	Ordinary shares held	Per cent of ownership
Mr. Saulius Karosas	123,850	89,91
Western Petroleum Ltd.	13,600	9,87
Vytenis Rasutis	300	0,22
Total	**137,750**	**100,00**

As at 31 December 2017 the shareholders of the Bank were as follows:

	Ordinary shares held	Per cent of ownership
Mr. Saulius Karosas	123,850	89,91
Western Petroleum Ltd.	13,600	9,87
Vytenis Rasutis	300	0,22
Total	**137,750**	**100,00**

Ultimate beneficiary of „Western Petroleum“ Ltd. is Saulius Karosas.
The issued share capital consists of 137,750 ordinary shares with the par value of EUR 144.81 each. As at 31 December 2018 and 2017, all shares were fully paid.

Note 2 Basis of preparation and significant accounting policies

Statement of compliance

The separate and consolidated financial statements have been prepared in accordance with International Financial Reporting Standards (IFRSs) as adopted by the European Union (EU).

Basis of measurement

The financial statements have been prepared on the historical cost basis except for financial assets at fair value through profit or loss, available-for-sale financial assets and investment property, measured at fair value, and buildings measured at revalued amounts.

Functional and presentation currency

These financial statements are presented in EUR, which is the Bank's and its subsidiaries' functional currency unless otherwise stated.

(All amounts in EUR thousand unless otherwise stated)

Note 2 Basis of preparation and significant accounting policies (cont'd)

Application of new and revised International Financial Reporting Standards (IFRSs)

Standards and Interpretations effective in the current period (effective from 1 January 2018

The following standards, amendments to the existing standards and interpretations issued by the International Accounting Standards Board (IASB) and adopted by the European Union (further – EU) are effective for the current period:

- Annual Improvements to IFRS Standards 2014-2016 Cycle (issued on 8 December 2016) effective for financial years beginning on or after 1 January 2018/2017),

- Amendments to IFRS 2: Classification and Measurement of Share-based Payment Transactions (effective for financial years beginning on or after 1 January 2018),

- Amendments to IAS 40: Transfers of Investment Property (effective for financial years beginning on or after 1 January 2018),

- IFRIC 22 Foreign Currency Transactions and Advance Consideration (effective for financial years beginning on or after 1 January 2018),

- Amendments to IFRS 4: Applying IFRS 9 Financial Instruments with IFRS 4 Insurance Contracts (effective for financial years beginning on or after 1 January 2018),

- FRS 15 Revenue from Contracts with Customers including amendments (effective for financial years beginning on or after 1 January 2018).

- Clarifications to IFRS 15 Revenue from Contracts with Customers (effective for financial years beginning on or after 1 January 2018).

- IFRS 9 Financial Instruments (effective for financial years beginning on or after 1 January 2018).

  This Standard replaces IAS 39, Financial Instruments: Recognition and Measurement, except that the IAS 39 exception for a fair value hedge of an interest rate exposure of a portfolio of financial assets or financial liabilities continues to apply, and entities have an accounting policy choice between applying the hedge accounting requirements of IFRS 9 or continuing to apply the existing hedge accounting requirements in IAS 39 for all hedge accounting.

  In the impairment model in IFRS 9, the loss model in IAS 39 is replaced by the expected credit loss model; this means that it is no longer necessary for the loss event to occur before recognizing impairment provisions.

  As a result of the first-time adoption of IFRS 9 requirements for impairment of financial assets, provisions for credit losses increased by EUR 302 thousand.

Overall assessment of the impact of impairment in accordance with IFRS 9 as at 1 January 2018 is shown in the tables below.

The Bank (The Group)	**31 December 2017 IAS 39**	**1 January 2018 IFRS 9**	**Change**
Loans and receivables	5 745	5 976	231
Debt securities	-	24	24
Placements with LB and other banks	-	20	20
Other financial assets	-	1	1
Impairment of financial instruments	**5 745**	**6 021**	**276**

The Bank (The Group)	**31 December 2017 IAS 39**	**31 December 2018 IFRS 9**	**Change**
Credit commitments	-	24	24
Guarantees	-	2	2
Total impairment for non-balance sheet items	**-**	**26**	**26**

(All amounts in EUR thousand unless otherwise stated)

Note 2 Basis of preparation and significant accounting policies (cont'd)

IFRS 9 includes a new general hedge accounting model, which aligns hedge accounting more closely with risk management. The types of hedging relationships – fair value, cash flow and foreign operation net investment – remain unchanged, but additional judgment will be required.

The standard contains new requirements to achieve, continue and discontinue hedge accounting and allows additional exposures to be designated as hedged items.

Classification – Financial assets

IFRS 9 contains a new classification and measurement approach for financial assets that reflects the business model in which assets are managed and their cash flow characteristics.

IFRS 9 contains three principal classification categories for financial assets: measured at amortised cost, fair value through other comprehensive income (FVOCI) and fair value through profit or loss (FVTPL). The Standard eliminates the existing IAS 39 categories of held to maturity, assets stated at fair value through profit (loss), loans and receivables, and assets available for sale.

Under IFRS 9, derivatives embedded in contracts where the host is a financial asset in the scope of the Standard are never bifurcated. Instead, the hybrid financial instrument as a whole is assessed for classification.

Based on the Bank's assessment, the change in the classification of the financial instruments as at 1 January 2018 is presented below:

The Bank	**Classification under IAS 39**	**Classification under IFRS 9**	**Carrying amount under IAS 39**	**Carrying amount under IFRS 9**
Financial assets				
Cash and due from central bank	Loans and receivables	Amortised cost	53,520	53,520
Placements with banks and other credit institutions	Amortised cost	Amortised cost	11,496	11,476
Held-to-maturity investments	Held-to-maturity	Amortised cost	39,860	39,836
Loans	Loans and receivables	Amortised cost	163,454	163,223
Other assets	Loans and receivables	Amortised cost	2,529	2,528
Total financial assets			**270,859**	**270,583**
Financial liabilities				
Due to banks and other credit institutions	Amortised cost	Amortised cost	3,600	3,600
Due to customers	Amortised cost	Amortised cost	252,920	252,920
Subordinated loans	Amortised cost	Amortised cost	1,000	1,000
Other liabilities	Amortised cost	Amortised cost	1,152	1,152
Total financial liabilities			**258,672**	**258,672**

(All amounts in EUR thousand unless otherwise stated)

Note 2 Basis of preparation and significant accounting policies (cont'd)

The Group	Classification under IAS 39	Classification under IFRS 9	Carrying amount under IAS 39	Carrying amount under IFRS 9
Financial assets				
Cash and due from central bank	Loans and receivables	Amortised cost	53,520	53,520
Placements with banks and other credit institutions	Amortised cost	Amortised cost	11,539	11,519
Held-to-maturity investments	Held-to-maturity	Amortised cost	39,860	39,836
Loans	Loans and receivables	Amortised cost	163,678	163,447
Other assets	Loans and receivables	Amortised cost	2,849	2,848
Total financial assets			**271,446**	**271,170**
Financial liabilities				
Due to banks and other credit institutions	Amortised cost	Amortised cost	3,600	3,600
Due to customers	Amortised cost	Amortised cost	251,855	251,855
Subordinated loans	Amortised cost	Amortised cost	1,000	1,000
Other liabilities	Amortised cost	Amortised cost	1,258	1,258
Total financial liabilities			**257,713**	**257,713**

Changes in accounting policies after the adoption of IFRS 9 have been applied retrospectively without adjusting the comparative financial information. The Bank and the Group have adopted an exception that does not permit the reconciliation of prior period financial information related to changes in grouping and measurement (including impairment). The differences in the carrying amount of financial assets and financial liabilities arising from the application of IFRS 9 were recognized on 1 January 2018 in retained earnings and reserves.

The application of the amendments to the above standards, with the exception of IFRS 9 Financial Instruments, did not have a material impact on the financial statements of the Bank and the Group.

Standards and Interpretations issued by IASB, approved by EU but not yet effective

The Bank and the Group did not yet apply these IFRS that are already issued on the date of signing these financial statements but are not yet effective:

- IFRS 16 Leases (effective for financial years beginning on or after 1 January 2019),

  IFRS 16 replaces IAS 17 Leases and related interpretations. This standard removes the current double-entry accounting model for tenants; Instead, companies are required to account for most of their leases in the statement of financial position on a single model, eliminating the distinction between operating and financial leases.

  Under paragraph 16, an IFRS contract is a lease or lease if it grants the right to manage the use of the identified asset for a period of time in exchange for consideration. The new model requires the tenant to recognize the right to use assets and lease obligations for such contracts. The right to use the property is depreciated and the obligation accrues interest. As a result, most rental transactions will incur an advance cost, even if the tenant pays constant annual rents.

  The new standard establishes a limited exceptions for lease transactions that includes:

- leasing transactions where the lease period does not exceed 12 months and the transaction does not provide for the possibility to purchase; and

- Lease transactions with small-ticket leases.

The lessor's accounting for the new standard will remain largely unchanged and the separation between operating and financial leases will be maintained.

Note 2 Basis of preparation and significant accounting policies (cont'd)

The Bank and the Group prepared an analysis of the expected impact of IFRS 16 on their financial statements. According to preliminary estimates, the Bank considers that the first-time application of this standard will result in a Bank and Group liability of 1.9 million. which will be accounted for as an asset lease and asset lease obligations

- Amendments to IFRS 9: Prepayment Features with Negative Compensation (effective for financial years beginning on or after 1 January 2019),

- IFRIC 23 Uncertainty over Income Tax Treatments (issued on 7 June 2017) (effective for financial years beginning on or after 1 January 2019),

- Amendments to IAS 28: Long-term Interests in Associates and Joint Ventures (issued on 12 October 2017) (effective for financial years beginning on or after 1 January 2019).

According to the Bank and the Group, the application of these standards, amendments and interpretations, except for IFRS 16 Leases, will not have a significant effect on the Bank's and the Group's financial statements at the time of its first adoption.

Standards and Interpretations issued by IASB but not yet endorsed by EU

IFRSs currently endorsed by EU are not significantly different from the standards, endorsed by IASB, except the standards, amendments and interpretations that were not endorsed by EU (the effective dates are applicable to IFRS to full extent). These standards, amendments and interpretations are listed below:

- IFRS 17 Insurance Contracts (IASB: effective for financial years beginning on or after 1 January 2021),

- Annual Improvements to IFRS Standards 2015-2017 Cycle (IASB: effective for financial years beginning on or after 1 January 2019),

- Amendments to IAS 19: Plan Amendment, Curtailment or Settlement (IASB: effective for financial years beginning on or after 1 January 2019),

- Amendments to References to the Conceptual Framework in IFRS Standards (IASB: effective for financial years beginning on or after 1 January 2020),

- Amendment to IFRS 3 Business Combinations (issued on 22 October 2018) (IASB: effective for financial years beginning on or after 1 January 2020),

- Amendments to IAS 1 and IAS 8: Definition of Material (issued on 31 October 2018) (effective for financial years beginning on or after 1 January 2020)

According to the Bank and the Group, the application of these standards, amendments and interpretations will not have a significant effect on the Bank's and the Group's financial statements at the time of its first adoption.

Basis of consolidation

The consolidated financial statements are prepared annually for the year ended 31 December and include the parent Bank and its subsidiaries. The financial statements of the subsidiaries are prepared for the same reporting year using consistent accounting policies.

Business combinations

The Group accounts for business combinations using the acquisition method when control is transferred to the Group. The consideration transferred in the acquisition is generally measured at fair value, as are the identifiable net assets acquired. Any goodwill that arises is tested annually for impairment. Any gain on a bargain purchase is recognised in profit or loss immediately. Transaction costs are expensed as incurred, except if related to the issue of debt or equity securities.

The consideration transferred does not include amounts related to the settlement of pre-existing relationships. Such amounts are generally recognised in profit or loss.

Any contingent consideration is measured at fair value at the date of acquisition. If an obligation to pay contingent consideration that meets the definition of a financial instrument is classified as equity, then it is not remeasured and settlement is accounted for within equity. Otherwise, subsequent changes in the fair value of the contingent consideration are recognised in profit or loss.

Note 2 Basis of preparation and significant accounting policies (cont'd)

Subsidiaries

Subsidiaries are investees controlled by the Group. The Group controls an investee if it is exposed to, 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. The Group reassesses whether it has control if there are changes to one or more of the elements of control. This includes circumstances in which protective rights held (e.g. those resulting from a lending relationship) become substantive and lead to the Group having power over an investee.

The financial statements of subsidiaries are included in the consolidated financial statements from the date on which control commences until the date on which control ceases.

Non-controlling interests

At the date of acquisition, non-controlling interests (NCIs) are measured at their proportionate share of the acquiree's identifiable net assets. Changes in the Group's interest in a subsidiary that do not result in a loss of control are accounted for as equity transactions.

Loss of control

When the Group loses control over a subsidiary, it derecognises the assets and liabilities of the subsidiary, and any related NCI and other components of equity. Any resulting gain or loss is recognised in profit or loss. Any interest retained in the former subsidiary is measured at fair value when control is lost.

Inter-company transactions between the Group companies are eliminated.

Subsidiaries in the separate financial statements are accounted at cost, less impairment. That means the income from the investment is recognised only to the extent that the Bank receives distributions from accumulated profits of the investee arising after the date of acquisition. Distributions received in excess of such profits are regarded as a recovery of investment and are recognised as a reduction of the cost of the investment.

Segment information

Operating segments are reported in accordance with the information analysed by the Management Board of the Group, which is responsible for allocating resources to the reportable segments and assesses its performance.

The Group has three main business segments:

Effect on financial statements of application of new standards and amendments and new interpretations to standards

Traditional banking operations and lending – includes traditional banking operations such as issuing loans and providing banking services to the customers and finance lease provided to micro, small and medium enterprises, households;

Treasury – includes banking treasury operations such as managing securities and liquidity portfolio, currency exchange etc.

Other activities – includes other banking operations not included in traditional banking operations and treasury segments such as income (expenses) related to investment in subsidiaries, operations with investment property and other subsidiaries operating income (expenses);

The activities of the Group's segments, with the exception of consumer loans, are property management and development, and the major of the Group's expenses (income) are from investment properties.
Transactions with other business segments is done with market price.

The key indicator for reporting to the management of the Bank is the pre-tax profit (loss), which consists of net interest income, net commission income, loan impairment changes, net result on operations on investment property, operating expenses, amortization and depreciation costs, and other net income

Note 2 Basis of preparation and significant accounting policies (cont'd)

Financial assets and financial liabilities

The Group and the Bank recognise financial assets and liabilities in their statement of financial position when, and only when, the Group and the Bank become a party to the contractual provisions of the instrument.

Under IFRS 9 Financial Assets - cash and cash equivalents, contractual rights to receive cash or another financial asset, contractual rights to exchange financial instruments with another party on terms that are potentially favourable, equity instruments of other entities, and contracts that will or may be settled themselves with company equity instruments.

Financial assets are classified:

- Financial assets that are subsequently measured at amortized cost;
- Financial assets that are measured at fair value in subsequent periods by recognizing a change in fair value through comprehensive income;
- Financial assets at fair value through profit or loss recognized in subsequent periods;

Financial assets are measured at amortized cost if both conditions are met:

- Financial assets are hold according to the business model - designed to hold financial assets to collect contractual cash flows;
- Due to contractual terms of the financial asset, cash flows that occur only on the principal amount and on the principal amount outstanding may arise on specified dates.

Financial assets are measured at fair value, the change of which is recognized in other comprehensive income if both of the following conditions are met:

- financial assets are held according to a business model whose purpose is to achieve the contractual cash flows and to sell the financial assets;
- Due to contractual terms of the financial asset, cash flows that occur only on the principal amount and on the principal amount outstanding may arise on specified dates.

Financial assets at fair value through profit or loss include those financial assets that are not classified as financial assets at amortized cost and as financial assets at fair value through profit or loss, for which changes are recognized in other comprehensive income. At initial recognition, a financial asset may be irrevocably classified as a financial asset measured at fair value through profit or loss, if such assignment eliminates or diminishes the inconsistency of the measurement and recognition of financial instruments (accounting inconsistencies). These financial assets cannot subsequently be transferred to another group of financial assets.

The category of financial assets is determined at the time of acquisition of these assets.

Recognition of financial assets

All ordinary acquisitions and disposals of financial assets for which a period specified in the regulatory authority or market agreements exists for the transfer of securities to the buyer are accounted for at settlement, i.e. when the asset is delivered to the Group or when the Group presents it to the buyer. On the trade date, an off-balance sheet liability is recognized for the purchase or sale of a financial asset that is derecognised at the time of settlement.

Loans granted are accounted for at amortized cost: the cost of the principal (calculated on the basis of direct transaction costs) less principal repayments, amortization of accrued difference between cost and redemption amount and loan impairment losses are recognized at initial recognition.

Business model evaluation. The objective of the Group's business model is to collect held-to-collect cash flows, where cash flows are only payments of principal and interest on principal. There are no financial instruments in the Group that aim to receive cash flows from the sale of instruments. No other business models are used.

Solely payments of principal and interest (SPPI). All loans and receivables are measured using the SPPI test. The estimated or principal amount is the fair value of the financial asset at initial recognition and meets the SPPI criteria. Is the interest earned a reward for the time value of money for credit risk associated with a non-covered principal amount. The credit risk element is assessed. Does the time value element for transactions with fixed interest rate fulfil the criteria. Variable interest rates are measured by the change in the time value of the monetary item and determine whether the change does not result in a significant difference between the contractual cash flows and the cash flows that would arise if the time value element did not change. In the case of insignificant deviations, it should be noted that loans and receivables meet the requirements of the SPPI.

Note 2 Basis of preparation and significant accounting policies (cont'd)

Financial assets measured at amortized cost with the Bank and its subsidiaries:

Cash and due from central bank;

Placements with banks and other credit institutions;

Held-to-maturity investments;

Loans and receivables;

Other assets.

Cash and cash at the central bank consist of balances of cash and other payment instruments, balances of funds in correspondent bank accounts of the Bank of Lithuania, reserve assets.

Cash is cash on hand with a book value equal to their fair value.

The fair value of funds in a central bank is equal to the carrying amount.

Loans and receivables are non-derivative financial assets with fixed and determinable payments that are not quoted on the market. This category of financial assets also includes bank-acquired (discounted) bills and the purchase of debt liabilities (factoring).

Other assets and other prepayments are cash paid for goods or services not yet provided.

The Bank accounts prepayments and advances at the cost of cash or cash.

Impairment of loans

The Impairment Model (Expected Credit Loss Calculation Model) will be applied to financial assets at amortized cost or fair value, excluding equity investments. Depending on the credit risk change since the initial recognition, financial instruments are classified into 3 risk levels. For off-balance sheet items, expected credit losses are calculated in the same way as losses for the respective balance sheet exposures according to the risk level of the respective balance sheet position.

Lending positions, irrespective of whether special provisions are set for a homogeneous group or individually, are regrouped in order to respond consistently to credit risk factors as macroeconomic conditions change. After the breakdown of lending positions, the amounts of special provisions are recalculated accordingly.

Lending positions, after assessing their credit risk from initial recognition, are classified into one of three risk levels:
Risk level 1 includes those exposures that have not significantly increased credit risk, i.e. no credit risk indicator or loss event has been recorded after the initial loan recognition.
Risk level 2 includes exposures with a credit risk indicator or significant credit risk increase.
Risk level 3 includes non-performing loans and other exposures that are expected to be defaulted (loss event).

Special provisions for a borrowing position shall be calculated collectively or individually in accordance with the following provisions:
Lending exposures assigned to risk level 1 (low credit risk) are collectively assessed and special provisions are valued at the amount of 12 months' ECL (expected credit loss) duration.
For risk level 2 (significant increase in credit risk), assigned credit exposures are valued collectively, except for customers with a bank lending position of more than EUR 500,000 or overdue payments from 60 to 90 calendar days. Lending positions are valued individually. For collectively assessed lending exposures, the amount of special provisions is calculated on the basis of an unlimited duration of ECL.
Lending positions assigned to level 3 (credit default) are assessed individually.

Other asset groups include lending positions that do not meet the criteria for other homogeneous groups.
Lending positions with the Central Bank are not assessed because they assume that their credit risk is very low and does not significantly increase from initial recognition.

Collectively rated lending exposures are assessed by the ECL using a model developed by the Bank that calculates internal risk parameters for each homogeneous group according to the applicable scenario. The Procedure for Recognition of Impairment of Financial Instruments is described in the Expected Credit Risk Loss Assessment Rules.

The carrying amount of the loans is reduced through the use of an allowance account and the amount of the impairment loss is included in the income statement. For all financial instruments, after initial recognition, the borrowing position is reviewed, and at least once a year a comprehensive assessment of the change in the client's risk profile is performed to determine the materiality of the credit risk. Each month, an assessment is made of indicators that reduce (increase) the credit risk of the borrowing position, by which the previously recognized impairment loss is reversed or increased by adjusting the allowance account. Impairment losses relate to the original application of IFRS 9 and are accounted for directly through equity.

Note 2 Basis of preparation and significant accounting policies (cont'd)

Lending positions, irrespective of whether special provisions are set for a homogeneous group or individually, are regrouped in order to respond consistently to credit risk factors as macroeconomic conditions change. After the breakdown of lending positions, the amounts of special provisions are recalculated accordingly.

Factoring

A factoring transaction is a funding transaction whereby the Group and the Bank finance their customers through buying their receivable claims. Companies transfer rights to invoices due at a future date to the Group and the Bank. Factoring transactions comprise factoring transactions with a right to recourse (the Group and the Bank are entitled to sell the overdue claim back to the customer) and factoring transactions without a right to recourse (the Group and the Bank are not entitled to sell the overdue claim back to the customer). The factor's revenue comprises the lump-sum contract fee charged on the conclusion of the contract, commission fees charged for processing the invoices, and interest income depending on the duration of the payment term set by the purchaser. Gains and losses are recognised in profit or loss when the factoring receivables are derecognised or impaired, as well as through the amortisation process.

The factoring balance includes the aggregate amount of factored invoices outstanding as at the reporting date and all amounts accrued for the unpaid amount.

Write-offs

When the loans and advances cannot be recovered and all collateral has been realised, they are written-off and charged against impairment for incurred credit losses. The management of the Group and the Bank makes the decision on writing-off loans. Recoveries of loans previously written-off are credited to the profit or loss.

Partial write-off may be applicable only for clients having the status of defaulted clients, if there is no evidence that full or partial Bank claim (principal, accrued interest and other charges) towards the client will be covered (e.g. the client has the status of bankrupt procedure, or the Bank has initiated legal procedure and there is not enough collateral and no expected cash flow or any other property to fully cover part of the claim).

Repurchase agreements

Securities sold under repurchase (repo) agreements are accounted for as trading or investment securities, depending on the classification of these papers at the time of acquisition. The liability related to this repurchase agreement is included in the amounts due to banks (other customers) or bank (other client) deposits.

Derivative financial instruments

The Bank uses derivatives such as foreign exchange forwards and swaps. Derivatives are recorded at fair value and carried as assets when their fair value is positive and as liabilities when their fair value is negative; they are initially recognised in the statement of financial position at their fair value on the settlement date. Changes in the fair value of derivatives held for trading are included in net trading income.

Fair values of the derivative financial instruments are disclosed in Note 14.

In 2018, the Bank granted certain loans to customers with variable interest rate; however, the floor for interest rate was also set in the agreements. The floor is an integral part of the agreement. Accounting standards mandate that if at the moment of granting the loan the floor interest rate approximates the market variable interest rate, then the embedded derivative is closely related with host contract and thus may be accounted for together.

Note 2 Basis of preparation and significant accounting policies (cont'd)

Financial assets and financial liabilities (cont'd)

Debt issued and other borrowed funds

Issued financial instruments and their components are classified as liabilities, where the substance of the contractual arrangement results in the Group and the Bank having an obligation either to deliver cash or another financial asset to the holder, or to satisfy the obligation other than by exchange of a fixed amount of cash or another financial asset for a fixed number of own equity shares. The components of compound financial instruments, that contain both liability and equity elements, are accounted for separately, with the equity component being assigned the residual amount after deducting from the instrument as a whole the amounts separately determined as the fair value of the liability component on the date of issue.

After initial recognition, debt issued and other borrowings, which are not designated at fair value through profit or loss, are subsequently measured at amortised cost using the effective interest method. Amortised cost is calculated by taking into account any discount or premium on the issue and costs that are an integral part of the effective interest rate.

Repurchase agreements

Securities sold that are subject to linked repurchase agreements are retained in the financial statements as trading or investment securities and the liability to the counterparty of the agreement is included in deposits from banks, other deposits, or deposits due to customers, as appropriate. Securities purchased under agreements to resell are recorded as loans and advances to other banks or customers as appropriate. The difference between sale and repurchase price is treated as interest and amortised over the life of repurchase agreements using effective interest rate for the whole period.

Borrowed securities are not included in the financial statements, unless they were sold to a third party. In that case a liability for the obligation to return these securities is recognised at fair value as a trading liability.

Derecognition of financial assets and liabilities

Financial liabilities

Financial liabilities - contractual obligations to transfer cash, other financial assets or financial instruments under potentially unfavourable conditions and contracts that will or may be settled by the Bank's own equity instruments. Financial liabilities are classified into:

- Financial liabilities at amortized cost;
- Valuable at fair value through profit or loss.

Financial liabilities are classified as financial liabilities at amortized cost, except for:

- measured at fair value through profit or loss and derivative financial instruments;
- financial liabilities that arise when the transfer of financial assets does not meet the criteria for derecognition or if a follow-up approach is applied;
- financial guarantee contracts;
- commitments to grant a loan with a lower than market interest rate;
- contingent consideration recognized in a business combination.

Financial liabilities measured at fair value through profit or loss include those financial liabilities that are not classified as financial liabilities at amortized cost in the category of financial liabilities. Financial liabilities at initial recognition may be irrevocably attributable to fair value through profit or loss, provided that:

- The group of financial liabilities or financial assets and financial liabilities is managed and its results are measured at fair value based on a documented risk management or investment strategy;
- Such an assignment eliminates or reduces the inconsistencies between the measurement and recognition of financial instruments (accounting discrepancies).

These financial liabilities cannot subsequently be transferred to another group of financial liabilities.

The Group has not classified any financial liabilities at fair value through profit or loss.

Financial liabilities measured at amortized cost with the Bank and its subsidiaries:

- Due to banks and other credit institutions;
- Due to customers;
- Subordinated loans;
- Other liabilities.

A financial liability is derecognised when the obligation under the liability is discharged or cancelled or expires.

Where an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as a derecognition of the original liability and the recognition of a new liability, and the difference in the respective carrying amounts is recognised in profit or loss.

Employee benefits

Short-term employee benefits

Short-term employee benefits are recognised as a current expense in the period when employees render services. These include salaries and wages, social security contributions, bonuses, paid holidays and other benefits. There are no significant long-term employee benefits.

Social security contributions

The Bank pays social security contributions to the State Social Security Fund (hereinafter referred to as the Fund) on behalf of its employees in accordance with the local legal requirements. The social security contributions are recognised as an expense on an accrual basis and are included within personnel expenses.

Foreign currency

Foreign currency transactions

Transactions in foreign currencies are translated to EUR at the official exchange rate of the Bank of Lithuania (spot exchange rate) prevailing at the dates of the transactions. Gains and losses resulting from the settlement of such transactions and from the translation of monetary assets and liabilities denominated in currencies other than EUR are recognised in the profit or loss.

Monetary assets and liabilities denominated in foreign currencies are retranslated at the spot exchange rate prevailing at the date of the statement of financial position. Gains and losses resulting from the translation of items of the statement of financial position are recognised in the profit or loss. Non-monetary items carried at cost are translated using the exchange rate at the date of the transaction, while non-monetary assets carried at fair value or revalued amounts are translated at the exchange rate when the fair value was determined.

The official exchange rates of the main currencies, used for the revaluation of the items in the statement of financial position as at the year-end were as follows (EUR units to currency unit):

	31 December 2018	31 December 2017
USD	1,1454	1,1993

Interest revenue and expenses

Interest revenue and expense are recognised in the profit or loss on an accrual basis using the effective interest rate method. The effective interest rate is the rate that exactly discounts the estimated future cash payments and receipts through the expected life of the financial asset or liability (or, where appropriate, a shorter period) to the carrying amount of the financial asset or liability. Loan origination fees for loans issued to customers are deferred (together with related direct costs) and recognised as an adjustment to the effective yield of the loans.

The calculation of the effective interest rate includes all fees and points paid or received, transaction costs and discounts or premiums that are an integral part of the effective interest rate. Transaction costs are incremental costs that are directly attributable to the acquisition, issue or disposal of a financial asset or liability.

Fees and commission

Fees and commission revenue and expenses that are integral to the effective interest rate on a financial asset or liability are included in the measurement of the effective interest rate.

Other fees and commission revenue, including account servicing fees, investment management fees, sales commission, placement fees and other are recognised on accrual basis as the related services are performed. When a loan commitment is not expected to result in the draw-down of a loan, loan commitment fees are recognised on a straight-line basis over the commitment period.

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

Note 2 Basis of preparation and significant accounting policies (cont'd)

Expenses

Other expenses are recognised on the basis of accrual and revenue and expense matching principles in the reporting period when the income related to these expenses was earned, irrespective of the time the money was spent. In those cases when the costs incurred cannot be directly attributed to the specific income and they will not bring income during the future periods, they are expensed as incurred. The amount of expenses is usually accounted for as the amount paid or due.

Dividends

Dividend revenue is recognised when the right to receive payment is established.

Cash and cash equivalents

Cash, current accounts with the Bank of Lithuania and current accounts with other banks due to their high liquidity with maturity up to three months from the date of placement are accounted for as cash and cash equivalents in the statement of cash flows. Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value.

Investment properties

Investment properties are measured initially at cost, including transaction costs. Subsequent to initial recognition, investment properties are stated at fair value, which reflects market conditions at the reporting date. Gains or losses arising from changes in the fair values of investment properties are included in the profit or loss in the period in which they arise.

Investment properties are derecognised when either they have been disposed of or when the investment property is permanently withdrawn from use and no future economic benefit is expected from its disposal. The difference between the net disposal proceeds and the carrying amount of the asset is recognised in the profit or loss in the period of derecognition.

Transfers are made to or from investment property only when there is a change in use. For a transfer from investment property to owner-occupied property, the deemed cost for subsequent accounting is the fair value at the date of change in use. If owner-occupied property becomes an investment property, the Group accounts for such property in accordance with the policy stated under property and equipment up to the date of change in use.

Intangible assets

Initially intangible assets acquired by the Group and the Bank are stated at cost. Following initial recognition, intangible assets are carried at cost less any accumulated amortisation and any accumulated impairment losses.

The useful lives of intangible assets are assessed to be either finite or indefinite. The Group and the Bank do not have any intangible assets with indefinite life.

Intangible assets with finite lives are amortised over the useful lives and assessed for impairment whenever there is an indication that the intangible asset may be impaired. Amortisation periods and methods for intangible assets with finite useful lives are reviewed at least at each financial year-end.

Costs associated with maintaining computer software programmes are recorded as an expense when incurred.

Subsequent expenditure on intangible assets is capitalised only when it increases the future economic benefits embodied in the specific asset to which it relates. All other expenditure is expensed as incurred.

Amortisation is recognised in profit or loss on a straight-line basis over the estimated useful life of the intangible assets, from the date that it is available for use. The estimate useful life of software is 3–7 years.

Property and equipment

Items of property and equipment are measured at cost less accumulated depreciation and impairment losses. Cost includes expenditures that are directly attributable to the acquisition of the asset. Purchased software that is integral to the functionality of the related equipment is capitalised as a part of that equipment. The cost of replacing part of an item of property or equipment is recognised in the carrying amount of the item if it is probable that the future economic benefits embodied within the part will flow to the Group and the Bank and its cost can be measured reliably. The costs of the day-to-day servicing of property and equipment are recognised in the profit or loss as incurred.

When parts of an item of property or equipment have different useful lives, they are accounted for as separate items (major components) of property and equipment.

Buildings are recorded at revalued amounts, being the fair value at the date of the revaluation less any subsequent accumulated depreciation and subsequent accumulated impairment losses. Revaluations are made with sufficient regularity such that the carrying amount does not differ materially from that which is determined using fair value at the date of statement of financial position. The fair value of the buildings is determined by appraisals undertaken by certified independent valuators. The depreciation of buildings is calculated on a straight-line basis over their estimated useful lives. The revaluation reserve for buildings is being reduced each period by the difference between depreciation based on the revalued carrying amount of the asset and that based on its original cost, which is transferred directly to retained earnings.

In the case of revaluation, when the estimated fair value of an asset is lower than its carrying amount, the carrying amount of this asset is immediately reduced to the amount of fair value and such decrease is recognised as an expense. However, such impairment is deducted from the amount of increase of the previous revaluation of this asset accounted for in the revaluation reserve to the extent it does not exceed the amount of such increase.

In the case of revaluation, when the estimated fair value of an asset is higher than its carrying amount, the carrying amount of this asset is increased to the amount of fair value and such increase is recorded in the revaluation reserve of property and equipment within equity.

Depreciation is recognised in profit or loss on a straight-line basis over the estimated useful lives of each part of an item of property and equipment.

The estimated useful lives for property and equipment are as follows:

Buildings	60–90 years
IT hardware	3–6 years
Vehicles	6 years
Fixtures and fittings	3–10 years

Depreciation methods, useful lives and residual values are reviewed, and adjusted if appropriate, at each financial year-end. Leasehold improvements are amortised over the shorter of the remaining lease term and their useful lives. The asset’s useful lives and methods are reviewed, and adjusted as appropriate, at each financial year-end.

Offsetting

Financial assets and liabilities are set off and the net amount presented in the statement of financial position when, and only when, the Group and the Bank have a currently enforceable legal right to set off the amounts and intend either to settle on a net basis or to realise the asset and settle the liability simultaneously.

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

Fair values of financial assets and liabilities

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

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

For financial instruments traded in active financial markets the fair value is determined by reference to quoted market prices. Bid prices are used for assets and ask prices are used for liabilities. In the absence of an active market the fair value of interest-bearing financial instruments is estimated based on discounted cash flows using the interest rates for items with similar terms and risk characteristics. For unquoted equity investments fair value is determined using valuation techniques. Such techniques include using recent arm’s length market transactions, reference to the current market value of another instrument, which is substantially the same and discounted cash flow analysis.

Measurement of fair values

A number of the Group and Bank accounting policies and disclosures require the measurement of fair values, for both financial and non-financial assets and liabilities.

When measuring the fair value of an asset or a liability, the Group and the Bank use market observable data as far as possible. Fair values are categorised into different levels in a fair value hierarchy based on the inputs used in the valuation techniques as follows:

- Level 1: quoted prices (unadjusted) in active markets for identical assets or liabilities;
- Level 2: inputs other than quoted prices included in Level 1 that are observable for the asset or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices);
- Level 3: inputs for the asset or liability that are not based on observable market data (unobservable inputs).

Note 2 Basis of preparation and significant accounting policies (cont'd)

Measurement of fair values (cont'd)

If the inputs used to measure the fair value of an asset or a liability might be categorised in different levels of the fair value hierarchy, the fair value measurement is categorised in its entirety in the same level of the fair value hierarchy as the lowest level input that is significant to the entire measurement.

The Group recognises transfers between levels of the fair value hierarchy at the end of the reporting period during which the change has occurred.

Further information about the assumptions made in measuring fair values is included in the following notes:

Note 8 – Loans and receivables
Note 9 – Property and equipment
Note 11 – Investment property
Note 31 – Fair value of financial instruments

Gains and losses on subsequent measurement

A gain or loss arising from a change in the fair value of a financial asset or liability is recognised as follows:

- a gain or loss on a financial instrument classified as at fair value through profit or loss is recognised in the profit or loss;
- a gain or loss on an available-for-sale financial asset is recognised in other comprehensive income (except for impairment losses and foreign exchange gains and losses on debt financial instruments) until the asset is derecognised, at which time the cumulative gain or loss previously recognised in equity is recognised in the profit or loss. Interest in relation to an available-for-sale financial asset is recognised as earned in the profit or loss calculated using the effective interest method.

For financial assets and liabilities carried at amortised cost, a gain or loss is recognised in the profit or loss when the financial asset or liability is derecognised or impaired, and through the amortisation process.

Impairment of financial assets

The Group and the Bank assess at each date of the statement of financial position whether there is any objective evidence that a financial asset or a group of financial assets is impaired. A financial asset or a group of financial assets is deemed to be impaired if there is objective evidence of impairment as a result of one or more events that have occurred after the initial recognition of the asset (a 'loss event') and that loss event (or events) has an impact on the estimated future cash flows of the financial asset or the group of financial assets that can be reliably estimated. Evidence of impairment may include indications that the borrower or a group of borrowers is experiencing significant financial difficulty, default or delinquency in interest or principal payments, the probability that they will enter bankruptcy or other financial reorganisation and where observable data indicates that there is a measurable decrease in the estimated future cash flows, such as changes in arrears or economic conditions that correlate with defaults.

<u>Due from banks and loans and advances to customers</u>

For amounts due from banks and loans and advances to customers carried at amortised cost, the Group and the Bank first assess individually whether objective evidence of impairment exists for financial assets that are individually significant, or collectively for financial assets that are not individually significant. If the Group and the Bank determine that no objective evidence of impairment exists for an individually assessed financial asset, whether significant or not, they include the asset in a group of financial assets with similar credit risk characteristics and collectively assess them for impairment. Assets that are individually assessed for impairment and for which an impairment loss is, or continues to be recognised, are not included in a collective assessment of impairment.

If there is objective evidence that an impairment loss has been incurred, the amount of the loss is measured as the difference between the asset's carrying amount and the present value of estimated future cash flows (excluding possible future credit losses that have not yet been incurred). The carrying amount of the asset is reduced through the use of an allowance account and the amount of the loss is recognised in the profit or loss. If, in a subsequent year, the amount of the estimated impairment loss increases or decreases because of an event occurring after impairment was recognised, the previously recognised impairment loss is increased or reduced by adjusting the allowance account.

The present value of the estimated future cash flows is discounted using the financial asset's original effective interest rate. If loan has a variable interest rate, the discount rate for measuring any impairment loss is the current effective interest rate determined under the contract. The calculation of the present value of the estimated future cash flows of a collateralised financial asset reflects the cash flows that may result from foreclosure less costs for obtaining and selling the collateral, whether or not foreclosure is probable.

Note 2 Basis of preparation and significant accounting policies (cont'd)

Impairment of financial assets (cont'd)

In assessing collective impairment the Group and the Bank use statistical modelling of 2 years historical trends of the probability of default, timing of recoveries and the amount of loss incurred, adjusted for management's judgement as to whether current economic and credit conditions are such that the actual losses are likely to be greater or less than suggested by historical modelling.

Future cash flows on a group of financial assets that are collectively evaluated for impairment are estimated on the basis of historical loss experience for assets with credit risk characteristics similar to those in the group. Historical loss experience is adjusted on the basis of current observable data to reflect the effects of current conditions that did not affect the years on which the historical loss experience is based and to remove the effects of conditions in the historical period that do not exist currently. Estimates of changes in future cash flows reflect, and are directionally consistent with, changes in related observable data from year to year. The methodology and assumptions used for estimating future cash flows are reviewed regularly to reduce any differences between loss estimates and actual loss experience.

Renegotiated loans

Where possible, the Group and the Bank seek to restructure loans rather than to take possession of collateral. This may involve extending the payment arrangements and the agreement of new loan terms. A loan that has been renegotiated due to a deterioration in the borrower's condition is usually considered to be impaired unless there is evidence that the risk of not receiving contractual cash flows has reduced significantly and there are no other indicators of impairment.

Management continuously reviews renegotiated loans to ensure that all criteria are met and that the future payments are likely to occur. The loans continue to be the subject to an individual or collective impairment assessment, calculated using the loan's original effective interest rate.

Impairment of other assets

The carrying amounts of the Group's and the Bank's non-financial assets, other than deferred tax assets, are reviewed at each reporting date to determine whether there is any indication of impairment.

If such an indication exists, the Group and the Bank make an estimate of the asset's recoverable amount. An asset's recoverable amount is the higher of an asset's or cash-generating unit's fair value less costs to sell and its value in use and is determined for an individual asset, unless the asset does not generate cash inflows that are largely independent of those from other assets or groups of assets. Where the carrying amount of an asset exceeds its recoverable amount the asset is considered impaired and is written down to its recoverable amount.

In assessing value in use the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. Impairment losses of continuing operations are recognised in profit or loss.

An assessment is made at each reporting date as to whether there is any indication that previously recognised impairment losses may no longer exist or may have decreased. If such indication exists, the recoverable amount is estimated. A previously recognised impairment loss is reversed only if there has been a change in the estimates used to determine the asset's recoverable amount since the last impairment loss was recognised. If that is the case, the carrying amount of the asset is increased to its recoverable amount. The increased amount cannot exceed the carrying amount determined, net of depreciation (if any), had no impairment loss been recognised for the asset in prior years. The reversal of impairment is recognised as profit or loss, unless the assets are carried at revalued amounts. If that is the case, such reversal is recognised as income to the extent it does not exceed the previous revaluation decrease recognised in profit or loss, and the remaining part as a revaluation increase. After such a reversal the depreciation charge (if any) is adjusted in future periods to allocate the asset's revised carrying amount, on a systematic basis over its remaining useful life.

Note 2 Basis of preparation and significant accounting policies (cont'd)

Impairment of other assets (cont'd)

Leases

The determination of whether an arrangement is, or contains, a lease is based on the substance of the arrangement at inception date, whether fulfilment of the arrangement is dependent on the use of a specific asset or assets or the arrangement conveys a right to use the asset, even if that right is not explicitly specified in an arrangement.

<u>Finance – the Group and the Bank as lessee</u>

The Group and the Bank recognise finance leases as assets and liabilities in the statement of financial position at the date of commencement of the lease term at amounts equal to the fair value of the leased property or, if lower, at the present value of the minimum lease payments, each determined at inception of the lease. In calculating the present value of the minimum lease payments the discount factor used is the interest rate implicit in the lease, when it is practicable to determine. Otherwise, the Group's and the Bank's incremental borrowing rate is used. Initial direct costs incurred are included as part of the asset. Lease payments are apportioned between the finance charge and the reduction of the outstanding liability. The finance charge is allocated to periods during the lease term so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period.

<u>Operating – the Group and the Bank as lessee</u>

Leases of assets under which the risks and rewards of ownership are effectively retained by the lessor are classified as operating leases. Lease payments under an operating lease are recognised as expenses on a straight-line basis over the lease term and included into other administrative and operating expenses.

<u>Finance leases – the Group and the Bank as lessor</u>

A finance lease is a lease that transfers substantially all the risks and rewards incidental to ownership of an asset. Title may or may not eventually be transferred. When assets are held subject to a finance lease, the present value of the lease payments is recognised as a receivable. The difference between the gross receivable and the present value of the receivable is recognised as unearned finance income. Lease income is recognised over the term of the lease using annuity method, which reflects a constant periodic rate of return.

Share capital

Share capital is presented in the statement of financial position at the amount subscribed.

Income tax

Income tax on the profit for the year comprises current and deferred tax. Income tax is calculated based on the Lithuanian tax legislation.

In accordance with the Law on Corporate Income Tax of the Republic of Lithuania, the current income tax rate is 15% on taxable income. Expenses related with taxation charges and included in these financial statements are based on calculations made by the management in accordance with Lithuanian tax legislation.

Tax losses can be carried forward for an indefinite period, except for the losses incurred as a result of disposal of securities. As at the taxable year 2015, ordinary tax losses carried forward can only be set off against up to 70% of the calculated taxable profits of the taxable period. The losses from disposal of securities can be carried forward for 5 consecutive years and only be used to reduce the taxable income earned from the transactions of the same nature.

Deferred taxes are calculated using the liability method. Deferred income taxes reflect the net tax effects of temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for income tax purposes. Deferred tax assets and liabilities are measured using the tax rates expected to apply to taxable income in the years in which those temporary differences are expected to reverse based on tax laws that have been enacted or substantively enacted at the date of the statement of financial position.

Deferred tax assets have been recognised in the statement of financial position to the extent the management believes they will be realised in the foreseeable future, based on taxable profit forecasts. If it is believed that part of the deferred tax asset is not going to be realised, this part of the deferred tax asset is not recognised in the financial statements.

Note 2 Basis of preparation and significant accounting policies (cont'd)

Income tax (cont'd)

Other taxes

Real estate annual tax rate is up to 3% on the tax value of property and equipment and foreclosed assets. The Bank is also obliged to pay land and land rent taxes, make payments to guarantee fund and social security contributions. These taxes are included in other expenses in the income statement.

Off-balance sheet items

All liabilities that may be recognised in the statement of financial position in the future are accounted for as off-balance sheet liabilities. This allows the Group and the Bank to assess capital requirement and to attract the necessary funding to cover these liabilities.

Related parties

Parties are considered to be related if one party has the ability to unilaterally or jointly control the other party or exercise significant influence over the other party in making financial or operational decisions, or where parties are under common control. In addition, members of key management personnel as well as their close family members and entities controlled by them, and close family members of individuals that unilaterally or jointly control the Bank or exercise significant influence over it. In considering each possible related party relationship, attention is directed to the substance of the relationship, not merely the legal form.

Credit-related commitments

Commitments to extend credit represent unused portions of authorisations to extend credit in the form of loans, guarantees or letters of credit. With respect to credit risk on commitments to extend credit, the Group and the Bank are potentially exposed to loss in an amount equal to the total unused commitments. However, the likely amount of loss is less than the total unused commitments, as most commitments to extend credit are contingent upon customers maintaining specific credit standards. The Group and the Bank monitor the term to maturity of credit commitments because longer-term commitments generally have a greater degree of credit risk than shorter-term commitments. Commitments to extend credit are treated as risk assets for capital adequacy calculation purposes.

In the ordinary course of the business the Group and the Bank issue financial guarantees, consisting of letters of credit, guarantees and acceptances. Financial guarantees are initially recognised in the financial statements at fair value, under Other Liabilities caption, being premium received. Subsequent to initial recognition, the Group's and the Bank's liability under each guarantee is measured at the higher of the amortised premium and the best estimate of expenditure required for settling any financial obligation arising as a result of the guarantee where payment has become probable.

Any increase in the liability relating to financial guarantees is recorded to profit or loss under Impairment expenses caption. The premium received is recognised in profit or loss in Net fees and commissions income caption on a straight-line basis over the life of guarantee.

Guarantees represent irrevocable assurances that the Group and the Bank will make payments in the event when a customer cannot meet its obligations to the third parties. In case of execution of such a guarantee it is subsequently accounted for as statement of financial position item and is subject for impairment assessment. Until a guarantee is terminated, it is treated as risk asset for capital adequacy calculation purposes.

Documentary and commercial letters of credit represent written undertakings by the Group and the Bank on behalf of a customer authorising a third party to draw drafts on the Group and the Bank up to a stipulated amount under specific terms and conditions. Letters of credit are collateralised by the underlying shipments of goods. Letters of credit are treated as risk assets for capital adequacy calculation purposes.

Provisions

Provisions are recognised when the Group and the Bank have a present obligation (legal or constructive) as a result of a past event, if it is probable that an outflow or recourses embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation.

The expense relating to any provision is presented in the profit or loss. If the effect of the time value of money is material, provisions are discounted using current pre-tax rate that reflects the risks specific to the liability. Where discounting is used the increase in the provision due to the passage of time is recognised as a borrowing cost.

Note 2 Basis of preparation and significant accounting policies (cont'd)

Contingencies

Contingent liabilities are not recognised in the financial statements. They are disclosed unless the possibility of an outflow of resources embodying economic benefits is remote. A contingent asset is not recognised in the financial statements but disclosed when an inflow or economic benefits is probable.

Subsequent events

Events subsequent to the year-end that provide additional information about the Group's and the Bank's position at the date of the statement of financial position (adjusting events) are reflected in the financial statements. Subsequent events that are not adjusting events are disclosed in the notes when material.

Note 3 Use of estimates and judgements in the preparation of financial statements

The preparation of the financial statements requires management to make estimates and assumptions that affect the reported amounts of assets, liabilities, income and expenses and disclosure of contingencies. The significant areas of estimation and judgements used in the preparation of the accompanying financial statements relate to evaluation of impairment losses for loans and other receivables, available-for-sale and held-to-maturity investments, investments in subsidiaries, fair value measurement, realisation of deferred tax asset, finance leases and derecognition of financial assets and going concern.

Below are presented key assumptions concerning the future and other key sources of estimation uncertainty at the date of the statement of financial position that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year.

Impairment losses on loans and receivables

The Group and the Bank regularly review their loans and receivables to assess impairment. The Group and the Bank use their experienced judgment to estimate the amount of any impairment loss in cases where a borrower is in financial difficulties and historical data relating to similar borrowers is available. Similarly, the Group and the Bank estimate changes in future cash flows based on the observable data indicating that there has been an adverse change in the payment status of borrowers in a group or national or local economic conditions that correlate with defaults on assets in the group. Management uses estimates based on historical loss experience for assets with credit risk characteristics and objective evidence of impairment similar to those in the group of loans and receivables when scheduling its future cash flows. The Group and the Bank use their experienced judgment to adjust observable data for a group of loans or receivables to reflect current circumstances. The methodology and assumptions used for estimating both the amount and timing of future cash flows are reviewed regularly to reduce any differences between loss estimates and actual loss experience. For further information see note 9 and Note 34.

Fair value of investment properties

The Group carries its investment properties at fair value, with changes in fair value being recognised in profit or loss. Based on the policy of the Bank and the Group, investment property has to be revaluated by external valuators at least every 3 years. For further information see Note 11.

Fair value of property and equipment

The buildings are carried at revalued amount which is their fair value as at the revaluation date less subsequently accumulated depreciation and impairment. Revaluations are carried out regularly, at least every 5 years, ensuring that the carrying amount of buildings does not significantly differ from their fair values as at reporting date. The fair value of buildings is established by certified independent real estate valuators.

Note 3 Use of estimates and judgements in the preparation of financial statements (cont'd)

Impairment losses on loans and receivables (cont'd)

Fair value of property and equipment (cont'd)

Depreciation is calculated on a straight-line basis over the estimated useful lives of the assets. The revaluation reserve of buildings is reduced by an equivalent amount of annual depreciation charged on revalued buildings each year and is transferred directly to retained earnings.

In case of revaluation, when the estimated fair value of the assets exceeds their carrying value, the carrying value is increased to the fair value and the amount of increase is included into revaluation reserve of property and equipment as other comprehensive income in equity. However, such increase in revaluation is recognised as income to the extent it does not exceed the decrease of previous revaluation recognised in profit or loss. Depreciation is calculated from the depreciable amount which is equal to acquisition cost less residual value of an asset. More information in Note 9.

Impairment of available-for-sale and held-to-maturity investments

The determination of impairment indication is based on comparison of the financial instrument's carrying value and fair value. The Group uses valuation models based on quoted market prices of similar products.

For the purposes of impairment loss measurement, the Bank's management makes estimates of any expected changes in future cash flows from a specific financial instrument based on analysis of financial position of the issuer of the financial instrument. Held to maturity investments are disclosed in Note 7.

Write-off of loans and receivables

In 2014, the Bank started to apply partial write-offs. Partial write-off is applied only for the defaulted clients, if there is no evidence that full or partial Bank claim (principal, accrued interest and other charges) towards the client will be satisfied (e.g. the client has entered bankruptcy, or the Bank has initiated a legal procedure and there is not enough collateral and no expected cash flow or any other property to fully cover part of the claim). More information in Note 8.

Impairment losses on investments in subsidiaries

The Bank tests investments in its subsidiaries for impairment when impairment indicators are identified. The Bank applies the adjusted net asset method for evaluation of the fair value of its subsidiaries. Taking into consideration activities of the subsidiaries, the investment value is measured based on the fair value of the subsidiaries' assets and liabilities. At the end of each year the Bank evaluates investment amount into each subsidiary against subsidiaries' assets and liabilities stated at fair value. The value of the investment property owned by subsidiaries and specified in external valuation reports is adjusted by a certain coefficient defined by the management of the Bank depending on the type of the investment property and associated risks (Note 12).

Adjustments are recorded when the estimation of the fair value of the investment in subsidiaries indicates impairment of the Bank's investment.

Finance leases

Management applies judgement to determine if substantially all the significant risks and rewards of ownership of financial assets and lease assets are transferred to counterparties, in particular which risks and rewards are the most significant and what constitutes substantially all risks and rewards.

Deferred tax asset

Deferred tax assets are recognised for all unused tax losses to the extent that it is probable that taxable profit will be available against which the losses can be utilised. Significant management judgment is required to determine the amount of deferred tax assets that can be recognised, based upon the likely timing and level of future taxable profits together with future tax planning strategies (Note 29).

Future events may occur which will cause the assumptions used in arriving at the estimates to change. The effect of any changes in estimates will be recorded in the financial statements, when determinable. Please refer to Note 34 for description of change in estimates on loan impairment.

Note 4 Going concern

The separate and consolidated financial statements have been prepared on a going concern basis.

(All amounts in EUR thousand unless otherwise stated)

Note 5 Placements with the central bank

The Group			The Bank	
31 December 2018	**31 December 2017**		**31 December 2018**	**31 December 2017**
2,280	1,943	Compulsory reserve with the central bank	2,280	1,943
27,790	27,099	Correspondent account with the central bank	27,790	27,099
30,070	**29,042**	**Placements with the central bank**	**30,070**	**29,042**

The Bank is being charged for holding compulsory reserves, i.e. for the whole amount of the compulsory reserves applying the European Central Bank's (ECB) main refinance operations interest rate. Moreover, the central bank of Lithuania calculates the interest amount for funds which exceed the amount of the compulsory reserves, applying the European Central Bank's (ECB) interest rate for using the deposit facility.

Note 6 Placements with banks and other credit institutions

The Group			The Bank	
31 December 2018	**31 December 2017**		**31 December 2018**	**31 December 2017**
12,099	6,929	Current accounts with correspondent banks	12,058	6,886
1,181	4,610	Term deposits	1,181	4,610
13,280	**11,539**	**Placements with banks and other credit institutions**	**13,239**	**11,496**

As at 31 December 2018, the Group and the Bank have pledged term deposits with the carrying amount of EUR 1,181 thousand for the possibility to perform FX transactions while as at 31 December 2017 EUR 1,208 thousand were pledged for the possibility to perform FX transactions.

As at 31 December 2017, the Group and the Bank have pledged term deposits with the carrying amount of EUR 66 thousand for an issued guarantee.

Note 7 Held-to-maturity investments

Held-to-maturity investments are as follows:

The Group			The Bank	
31 December 2018	**31 December 2017**		**31 December 2018**	**31 December 2017**
43,888	18,017	Government bonds of the Republic of Lithuania	43,888	18,017
1,148	-	Bank bonds	1,148	-
1,314	1,220	Non-financial company bonds	1,314	1,220
1,566	1,600	Government bonds of the Republic of Iceland	1,566	1,600
1,002	1,869	Government bonds of the Kingdom of Spain	1,002	1,869
-	1,943	Government bonds of the Republic of Belgium	-	1,943
-	1,058	Government bonds of the Republic of Croatia	-	1,058
4,575	1,003	Government bonds of the Republic of Latvia	4,575	1,003
3,005	2,127	Government bonds of the Republic of Poland	3,005	2,127
3,089	2,075	Government bonds of the Republic of Romania	3,089	2,075
4,172	2,565	Government bonds of the Republic of Slovenia	4,172	2,565
2,619	3,347	Government bonds of the Kingdom of Sweden	2,619	3,347
2,689	1,668	Government bonds of the Republic of Finland	2,689	1,668
1,679	1,368	Government bonds of the Republic of Hungary	1,679	1,368
70,746	**39,860**	**Held-to-maturity investments**	**70,746**	**39,860**

(All amounts in EUR thousand unless otherwise stated)

Note 7 Held-to-maturity investments (continued)

As at 31 December 2018, the Group and the Bank had held-to-maturity debt securities held as collateral amounting to EUR 6,291 thousand (EUR 8,188 thousand as at 31 December 2017) to secure the repurchase agreement under targeted longer-term refinancing operations provided by ECB.

Coupon rates and maturities of held-to-maturity investments are as follows:

	2018		2017	
	%	Maturity	%	Maturity
Government bonds of the Republic of Lithuania	0-5.5	2019-2024	0.3–5.5	2018–2024
Bank bonds	1.875	2019	-	-
Non-financial company bonds	4-6	2019-2020	1.25–4.5	2018–2020
Government bonds of the Republic of Iceland	2.5	2020	2.5	2020
Government bonds of the Republic of Belgium	-	-	1.125–1.5	2018
Government bonds of the Kingdom of Spain	0.25	2019	0.25–4.00	2018–2019
Government bonds of the Republic of Croatia	-	-	5.875	2018
Government bonds of the Republic of Latvia	0.5 – 0.625	2019-2020	0.25	2018
Government bonds of the Republic of Poland	0.875-6.375	2019-2021	0.875–4.00	2019–2021
Government bonds of the Republic of Slovenia	4.125	2019	4.125–4.75	2018–2019
Government bonds of the Republic of Romania	2.75-4.875	2019-2025	2.75–4.625	2020–2025
Government bonds of the Kingdom of Swedish	1.125	2019	0.875–1.00	2018
Government bonds of the Republic of Finland	1	2019	1.00	2018
Government bonds of the Republic of Hungary	4-6	2019	5.75–6	2018–2019

Note 8 Loans and receivables

Loans to customers and receivables comprise:

	The Bank	
	31 December 2018	**31 December 2017**
Loans to customers, including short-term bills of exchange	156,946	152,518
Receivable with deferred payment	-	2,661
Overdrafts	1,814	1,348
Factoring	589	759
Leasing	12,992	11,874
	172,341	**169,160**
Less: impairment	(2,546)	(5,706)
Loans and receivables, net	**169,795**	**163,454**

	The Group	
	31 December 2018	**31 December 2017**
Loans to customers, including short-term bills of exchange	158,803	152,523
Receivable with deferred payment	227	2,927
Overdrafts	1,814	1,348
Factoring	589	759
Leasing	12,992	11,874
	174,425	**169,431**
Less: impairment	(2,599)	(5,753)
Loans and receivables, net	**171,826**	**163,678**

(All amounts in EUR thousand unless otherwise stated)

Note 8 Loans and receivables (cont'd)

In the table "Loans and receivables", the line "impairment" does not include provisions for funds in banks and debt securities (the Bank and the Group amounted for 55 thousand). 31 December 2017 Impairment for funds in banks and debt securities were not formed.

As at 31 December 2018, the Group and the Bank had a concentration of loans within the loan portfolio represented by loans issued to 10 major clients, the amount of which was EUR 37,632 thousand or 21.90% of the Group's net loan portfolios (EUR 29,522 thousand or 18.06% in 2017). As at 31 December 2018, the total impairment of these loans issued to 10 major clients in the Bank and in the Group amounted to EUR 77 thousand (EUR 42 thousand as at 31 December 2017).

Receivable with deferred payment includes the Bank's or the Group's receivables under instalment sale contracts of investment property or sale agreements of creditor's claims of the Bank. Under those sale agreements a buyer usually pays the Bank or the Group initial payment which is at least 10 percent of contractual amount and repays the rest amount of debt at the end of the contract and accrued interest on a regular basis according to the terms and conditions of sale contract. Management of credit risk derived from receivables with deferred payment complies with the general credit risk management principles described in Note 34 and credit risk exposure is mitigated using mortgage of real estate or pledge of creditor claims.

The movements in impairment of loans and receivables were as follows:

	The Bank					
	1 January 2018	**Changes due to change in valuation methodology Influence of IFRS 9**	**Increase in provisions due to acquisition**	**Changes in provisions (net amount)**	**Decrease in provisions due to write-downs**	**31 December 2018**
Level I	**(227)**	**(196)**	**(170)**	**153**	**-**	**(440)**
Debt securities	***-***	***(24)***	***(32)***	***14***	***-***	***(42)***
Government institutions	-	(23)	(31)	13	-	(41)
Other financial institutions	-	-	(1)	-	-	(1)
Non-financial companies	-	(1)	-	1	-	-
Loans and other advance payments	***(227)***	***(172)***	***(138)***	***139***	***-***	***(398)***
Government institutions	(5)	(6)	-	(1)	-	(12)
Credit institutions	-	(20)	(3)	8	-	(14)
Other financial institutions	(2)	(1)	-	1	-	(2)
Non-financial companies	(139)	(93)	(107)	109	-	(230)
Households	(81)	(52)	(29)	22	-	(140)
Level II	**(9)**	**(25)**	**(3)**	**(41)**	**-**	**(78)**
Loans and other advance payments	***(9)***	***(25)***	***(3)***	***(41)***	***-***	***(78)***
Non-financial companies	(7)	(21)	(1)	(21)	-	(50)
Households	(2)	(4)	(2)	(20)	-	(28)
Level III	**(5,470)**	**(55)**	**-**	**(1,377)**	**4,819**	**(2,083)**
Loans and other advance payments	***(5,470)***	***(55)***	***-***	***(1,377)***	***4,819***	***(2,083)***
Non-financial companies	(3,473)	1	-	(742)	2,599	(1,615)
Households	(1,997)	(56)	-	(635)	2,220	(468)
Total amount of provisions for debt instruments	**(5,706)**	**(276)**	**(173)**	**(1,265)**	**4,819**	**(2,601)**

(All amounts in EUR thousand unless otherwise stated)

Note 8 Loans and receivables (cont'd)

	The Group					
	1 January 2018	**Changes due to change in valuation methodology Influence of IFRS 9**	**Increase in provisions due to acquisition**	**Changes in provisions (net amount)**	**Decrease in provisions due to write-downs**	**31 December 2018**
Level I	**(228)**	**(196)**	**(187)**	**154**	**-**	**(457)**
Debt securities	***-***	***(24)***	***(32)***	***14***	***-***	***(42)***
Government institutions	-	(23)	(31)	13	-	(41)
Other financial institutions	-	-	(1)	-	-	(1)
Non-financial companies	-	(1)	-	1	-	-
Loans and other advance payments	***(228)***	***(172)***	***(155)***	***140***	***-***	***(415)***
Government institutions	(5)	(6)	-	(1)	-	(12)
Credit institutions	-	(20)	(2)	8	-	(14)
Other financial institutions	(2)	(1)	-	1	-	(2)
Non-financial companies	(139)	(93)	(107)	109	-	(230)
Households	(82)	(52)	(46)	23	-	(157)
Level II	**(11)**	**(25)**	**(4)**	**(39)**	**-**	**(79)**
Loans and other advance payments	***(11)***	***(25)***	***(4)***	***(39)***	***-***	***(79)***
Non-financial companies	(7)	(21)	(1)	(21)	-	(50)
Households	(4)	(4)	(3)	(18)	-	(29)
Level III	**(5,514)**	**(55)**	**(4)**	**(1,364)**	**4,819**	**(2,118)**
Loans and other advance payments	***(5,514)***	***(55)***	***(4)***	***(1,364)***	***4,819***	***(2,118)***
Non-financial companies	(3,473)	1	-	(742)	2,599	(1,615)
Households	(2,041)	(56)	(4)	(622)	2,220	(503)
Total amount of provisions for debt instruments	**(5,753)**	**(276)**	**(195)**	**(1,249)**	**4,819**	**(2,654)**

From 1 January 2018 when the IFRS 9 *Financial assets* becomes effective, IAS 39 replaces the loss model for expected credit loss model.

The Group has availed itself of an exemption that allows not to adjust prior period financial information related to changes in grouping and measurement (including impairment). Differences in the carrying amounts of financial assets and financial liabilities arising from the application of IFRS 9 are recognized as at 1 January 2018 in retained earnings and reserves.

(All amounts in EUR thousand unless otherwise stated)

Note 8 Loans and receivables (cont'd)

	The Bank		
	Corporate Loans	**Individuals loans**	**Impairment total**
As at 31 December 2016	**4,419**	**981**	**5,400**
Individual impairment	**4,047**	**959**	**5,006**
Loans and receivables	4,038	959	4,997
Loans to banks	-	-	-
Loans to financial institutions	-	-	-
Receivables from leasing	9	-	9
Collective impairment	**372**	**22**	**394**
Loans and receivables	336	20	356
Loans to banks	-	-	-
Loans to financial institutions	6	-	6
Receivables from leasing	30	2	32
Impairment charged to profit or loss (Note 28)	**1,718**	**796**	**2,514**
Loans and receivables	1,670	795	2,465
Loans to banks	2	-	2
Loans to financial institutions	14	-	14
Receivables from leasing	32	1	33
Reversal of impairment charged to profit or loss (Note 28)	**(1,517)**	**(270)**	**(1,787)**
Loans and receivables	(1,460)	(268)	(1,728)
Loans to banks	(2)	-	(2)
Loans to financial institutions	(18)	-	(18)
Receivables from leasing	(37)	(2)	(39)
Write-offs	**(275)**	**(146)**	**(421)**
Loans and receivables	(275)	(146)	(421)
Loans to banks	-	-	-
Loans to financial institutions	-	-	-
Receivables from leasing	-	-	-
As at 31 December 2017	**4,345**	**1,361**	**5,706**
Individual impairment	**4,152**	**1,309**	**5,461**
Loans and receivables	4,135	1,309	5,444
Loans to banks	-	-	-
Loans to financial institutions	-	-	-
Receivables from leasing	17	-	17
Collective impairment	**193**	**52**	**245**
Loans and receivables	174	51	225
Loans to banks	-	-	-
Loans to financial institutions	2	-	2
Receivables from leasing	17	1	18

(All amounts in EUR thousand unless otherwise stated)

Note 8 Loans and receivables (cont'd)

	The Group		
	Corporate loans	**Individuals loans**	**Impairment total**
As at 31 December 2016	**4,688**	**981**	**5,669**
Individual impairment	**4,316**	**959**	**5,275**
Loans and receivables	4,307	959	5,266
Loans to banks	-	-	-
Loans to financial institutions	-	-	-
Receivables from leasing	9	-	9
Collective impairment	**372**	**22**	**394**
Loans and receivables	336	20	356
Loans to banks	-	-	-
Loans to financial institutions	6	-	6
Receivables from leasing	30	2	32
Impairment charged to profit or loss (Note 28)	**1,718**	**843**	**2,561**
Loans and receivables	1,670	842	2,512
Loans to banks	2	-	2
Loans to financial institutions	14	-	14
Receivables from leasing	32	1	33
Reversal of impairment charged to profit or loss (Note 28)	**(1,517)**	**(270)**	**(1,787)**
Loans and receivables	(1,460)	(268)	(1,728)
Loans to banks	(2)	-	(2)
Loans to financial institutions	(18)	-	(18)
Receivables from leasing	(37)	(2)	(39)
Write-offs	**(544)**	**(146)**	**(690)**
Loans and receivables	(544)	(146)	(690)
Loans to banks	-	-	-
Loans to financial institutions	-	-	-
Receivables from leasing	-	-	-
As at 31 December 2017	**4,345**	**1,408**	**5,753**
Individual impairment	**4,152**	**1,354**	**5,506**
Loans and receivables	4,135	1,354	5,489
Loans to banks	-	-	-
Loans to financial institutions	-	-	-
Receivables from leasing	17	-	17
Collective impairment	**193**	**54**	**247**
Loans and receivables	174	53	227
Loans to banks	-	-	-
Loans to financial institutions	2	-	2
Receivables from leasing	17	1	18

In 2014, the Bank started to apply partial write-offs. Partial write-off is applied only for the defaulted clients, if there is no evidence that full or partial Bank claim (principal, accrued interest and other charges) towards the client will be satisfied (e.g. the client has entered bankruptcy, or the Bank has initiated a legal procedure and there is not enough collateral and no expected cash flow or any other property to fully cover part of the claim).

As at 31 December 2018, the outstanding amount of loans written-off in the Bank amounted to EUR 9.9 million (EUR 18.6 million as at 31 December 2017). Also, during 2018, the income received from the written-off loans amounted to EUR 115 thousand (amounted to EUR 533 thousand during 2017), EUR 142 thousand have been received for sold written-off loan portfolio which amounted to EUR 17 million nominal value.

For the sale of right of claim the Bank received EUR 5.90 million (creditor claims amount to EUR 10.1 million).

The impairment calculation policy is disclosed in the Note 33.

(All amounts in EUR thousand unless otherwise stated)

Note 9 Property and equipment

The movements in property and equipment were as follows:

The Bank

	Land, buildings and other real estate	Vehicles	Office equipment and other	Total
Acquisition cost or revalued amounts				
Balance as at 31 December 2017	**4,762**	**745**	**2,313**	**7,820**
Additions (reconstruction)	15	493	319	827
Disposals and write-offs	(54)	(174)	(214)	(442)
Balance as at 31 December 2018	**4,723**	**1,064**	**2,418**	**8,205**
Accumulated depreciation and impairment losses				
Balance as at 31 December 2017	**479**	**259**	**1,744**	**2,482**
Depreciation for the year	57	150	277	484
Disposals and write-offs	-	(98)	(208)	(306)
Balance as at 31 December 2018	**536**	**311**	**1,813**	**2,660**
Net book value				
As at 31 December 2017	**4,283**	**486**	**569**	**5,338**
As at 31 December 2018	**4,187**	**753**	**605**	**5,545**

The Group

	Land, buildings and other real estate	Vehicles	Office equipment and other	Total
Acquisition cost or revalued amounts				
Balance as at 31 December 2017	**4,762**	**745**	**2,318**	**7 825**
Additions (reconstruction)	15	493	319	827
Disposals and write-offs	(54)	(174)	(214)	(442)
Balance as at 31 December 2018	**4,723**	**1,064**	**2,423**	**8 210**
Accumulated depreciation and impairment losses				
Balance as at 31 December 2017	**479**	**259**	**1,744**	**2,482**
Depreciation for the year	57	150	279	486
Disposals and write-offs	-	(98)	(208)	(306)
Balance as at 31 December 2018	**536**	**311**	**1,815**	**2,662**
Net book value				
As at 31 December 2017	**4,283**	**486**	**574**	**5,343**
As at 31 December 2018	**4,187**	**753**	**608**	**5,548**

(All amounts in EUR thousand unless otherwise stated)

Note 9 Property and equipment (cont'd)

The Bank

	Land, buildings and other real estate	Vehicles	Office equipment and other	Total
Acquisition cost or revalued amounts				
Balance as at 31 December 2016	**3,992**	**546**	**2,378**	**6,916**
Additions	1,269	211	349	1,829
Disposals and write-offs	(499)	(12)	(414)	(925)
Balance as at 31 December 2017	**4,762**	**745**	**2,313**	**7,820**
Accumulated depreciation and impairment losses				
Balance as at 31 December 2016	**441**	**157**	**1,929**	**2,527**
Depreciation for the year	54	107	221	382
Disposals and write-offs	(16)	(5)	(406)	(427)
Balance as at 31 December 2017	**479**	**259**	**1,744**	**2,482**
Net book value				
As at 31 December 2016	**3,551**	**389**	**449**	**4,389**
As at 31 December 2017	**4,283**	**486**	**569**	**5,338**

The Group

	Land, buildings and other real estate	Vehicles	Office equipment and other	Total
Acquisition cost or revalued amounts				
Balance as at 31 December 2016	**3,992**	**546**	**2,378**	**6,916**
Additions	1,269	211	354	1,834
Disposals and write-offs	(499)	(12)	(414)	(925)
Balance as at 31 December 2017	**4,762**	**745**	**2,318**	**7,825**
Accumulated depreciation and impairment losses				
Balance as at 31 December 2016	**441**	**157**	**1,929**	**2,527**
Depreciation for the year	54	107	221	382
Disposals and write-offs	(16)	(5)	(406)	(427)
Balance as at 31 December 2017	**479**	**259**	**1,744**	**2,482**
Net book value				
As at 31 December 2016	**3,551**	**389**	**449**	**4,389**
As at 31 December 2017	**4,283**	**486**	**574**	**5,343**

As at 31 December 2018 and 2017, the Bank and the Group did not have property and equipment purchased under finance lease agreements.

As at 31 December 2018 and 2017, the owner-occupied buildings of the Group and the Bank are accounted for at the revalued amounts. The Bank renovated a part of the premises and made the valuation of the entire building in 2016 on the basis of the comparative method. The value according to the valuation report approximates the net book value of the building; therefore, there was no impact recorded due to the recent valuation. Had the buildings been booked at historical costs, the carrying amount of buildings of the Group and the Bank as at 31 December 2018 would be EUR 3,629 thousand (EUR 3,676 thousand as at 31 December 2017).

Note 9 Property and equipment (cont'd)

The following table shows the valuation technique used in measuring the fair value of property, as well as the significant unobservable inputs used:

Type	Valuation technique
Buildings and land with the carrying amount of EUR 4,283 thousand located in Vilnius, Kaunas and Klaipėda.	Every five years an independent valuator evaluates real estate owned by the Bank. Last evaluations for Klaipėda buildings were made in 2018 and for Vilnius and Kaunas building in 2017 by using different valuation techniques: the comparative method and the income method. The fair value was based on the results of comparable sales of similar buildings and land.

(All amounts in EUR thousand unless otherwise stated)

Note 10 Intangible assets

The movements in intangible assets were as follows:

	The Bank	The Group
	Software	**Software**
Acquisition cost		
Balance as at 31 December 2016	**2,002**	**2,033**
Additions	170	211
Disposals and write-offs	(3)	(3)
Balance as at 31 December 2017	**2,169**	**2,241**
Accumulated amortisation		
Balance as at 31 December 2016	**1,759**	**1,769**
Charges for the year	146	161
Disposals and write-offs	(3)	(3)
Balance as at 31 December 2017	**1,902**	**1,927**
Net book value		
As at 31 December 2016	**243**	**264**
As at 31 December 2017	**267**	**314**

	The Bank	The Group
	Software	**Software**
Acquisition cost		
Balance as at 31 December 2015	**1,959**	**1,959**
Additions	49	80
Disposals and write-offs	(6)	(6)
Balance as at 31 December 2016	**2,002**	**2,033**
Accumulated amortisation		
Balance as at 31 December 2015	**1,576**	**1,576**
Charges for the year	190	200
Disposals and write-offs	(7)	(7)
Balance as at 31 December 2016	**1,759**	**1,769**
Net book value		
As at 31 December 2015	**383**	**383**
As at 31 December 2016	**243**	**264**

As at 31 December 2018 and 2017, the Bank and the Group did not have any intangible assets acquired under finance lease agreements.

(All amounts in EUR thousand unless otherwise stated)

Note 11 Investment property

	The Bank 2018	The Bank 2017
Balance at the beginning of year	**1,370**	**913**
Additions	1,382	1,070
Disposals	(1,460)	(568)
Changes in fair value	(242)	(45)
Balance at the end of year	**1,050**	**1,370**

	The Group 2018	The Group 2017
Balance at the beginning of year	**6,213**	**8,354**
Additions	1,407	1,871
Disposals	(3,471)	(3,332)
Changes in fair value	(1,131)	(680)
Balance at the end of year	**3,018**	**6,213**

The Bank's and the Group's additions to the investment property represent the assets taken over for impaired loans. This is not a cash flow transaction; therefore, the acquisitions to the investment property by the Bank and the Group are zero in the Separate and Consolidated Cash Flow Statements. Some items of the investment property were sold by issuing a new loan to the acquirer; therefore, the disposal proceeds were decreased by EUR 77 thousand in the cash flow statement of the Bank and by EUR 418 thousand in the cash flow statement of the Group (during 2017 – EUR 250 thousand in the cash flow statement of the Bank, EUR 976 thousand – in the cash flow statement of the Group).

The fair value of investment properties owned by subsidiaries as at December 31:

	2018	2017
UAB MB Turtas	98	401
UAB MB Valda	251	831
UAB MB Investicija	229	554
UAB TG Invest-1	1,390	2,470
SIA Nida Capital	-	586
Total	**1,968**	**4,842**

Investment property consists of repossessed assets for defaulted loans. The fair value of investment properties has been determined using valuation reports prepared by external valuators. In addition, the management of the Bank decided to use adjustment coefficients varying as at 31 December 2018 from 0.39 to 0.74 (0.72 to 0.98 during 2017), depending on the type of investment property, taking into consideration the liquidity of the asset, VAT risks, costs and other factors:

	2018			2017		
Type of investment property	**Fair value as to valuation reports**	**Adjustment coefficient**	**Adjusted fair value**	**Fair value as to valuation reports**	**Adjustment coefficient**	**Adjusted fair value**
Buildings	1,759		1,221	3,315		2,843
Land plots	2,624		1,776	4,501		3,369
Other	20		21	1		1
Total	**4,403**	0.69	**3,018**	**7,817**	0.79	**6,213**

Note 11 Investment property (cont'd)

During 2018 the Group engaged independent valuation specialists to revaluate the investment property which had been evaluated as early as 4 years ago according to the requirements of the Group's accounting policy. Independent valuations of the Investment property or Consultation regarding expected price were obtained from independent valuators. Repeated valuations of property at net values for each relevant year were the following:

- EUR 47 thousand or 1.57% in 2019;
- EUR 181 thousand or 6.01% of the investment property in 2018;
- EUR 2,207 thousand or 73.11% in 2017;
- EUR 495 thousand or 16.41% in 2016;
- EUR 88 thousand or 2.90% in 2014.

The Group recognised EUR 1,131 thousand fair value decrease of investment property in 2018 (EUR 680 thousand in 2017).

The price range of land plots, buildings and equipment used in determining the fair value according to their purpose were as follows:

2018 The Bank

Land plots	Price range per are, in EUR thousand
Agricultural	0.02–0.08
Residential	7.35
Other	0.61

Buildings	Price range per sq. m., in EUR thousand
Commercial	0.12–1.10
Residential	0.45–9.32

Other	Price range per sq. m., in EUR thousand
Other assets	2.17 – 18.56

2018 The Group

Land plots	Price range per are, in EUR thousand
Agricultural	0.02–0.67
Residential	0.01–7.35
Other	0.01 –16.20

Buildings	Price range per sq. m., in EUR thousand
Commercial	0.12–1.10
Residential	0.17–9.32

Other	Price range per sq. m., in EUR thousand
Other assets	2.17 – 18.56

Note 11 Investment property (cont'd)

2017 The Bank

Land plots	Price range per are, in EUR thousand
Agricultural	0.01–0.42
Residential	7.45
Other	0.63

Buildings	Price range per sq. m., in EUR thousand
Commercial	0.04–1.18
Residential	0.32–9.92
Other	0.11

2017 The Group

Land plots	Price range per are, in EUR thousand
Agricultural	0.01–0.67
Forestry	0.04
Residential	0.02–7.45
Other	0.01–16.20

Buildings	Price range per sq. m., in EUR thousand
Commercial	0.04–1.18
Residential	0.03–9.92
Outbuildings	0.06
Other	0.11

Investment properties are based on the fair value, which is determined based on valuation performed by independent valuators by using comparative value, discounted cash flows from rental or other income and cost approach to valuation methods. Comparative value method is used to determine the market value of comparable properties with similar transaction prices or offer price, taking into account the differences between the object and comparable assets. The use of this method is based on the principle of replacement by the other assets. Discounted cash flows technique: the model is based on expected discounted cash flows from rental or other income. Cost approach to valuation technique: it is a method of appraising property based on the depreciated reproduction or replacement cost (new) of similar assets, plus the market value of the site.

Applying the comparative value method, property assessor must collect and analyse more data on events in the area of similar items for sale and purchase transactions, as well as the proposed sale of similar items. If the property assessor has insufficient information about similar objects (analogue) in the area, he must explore comparable analogues in other areas of comparable facilities and to clarify the difference. In order to calculate the adjustments, there is a need to compare the data and to clarify correction factors: the time correction factor, the size of the area correction factor, correction factor for the financial conditions, other correction factors, expressing the differences of physical and terms of use conditions.

The fair value of investment property was determined by external, independent property valuators, having appropriate recognised professional qualifications and recent experience in the location and category of the property being valued. The independent valuators provide the fair value of the Group's investment property portfolio every 3 years. As at 31 December 2018, the Group had investment property in the amount of EUR 88 thousand that was revalued more than 4 years ago.

As mentioned above, in addition to external valuations, the management of the Bank decided to use adjustment coefficients depending on the type of investment property taking into consideration liquidity of the asset, VAT risks, costs and other factors.

(All amounts in EUR thousand unless otherwise stated)

Note 11 Investment property (cont'd)

The fair value measurement for investment property of EUR 3,018 thousand has been categorised as a Level 3 in the fair value hierarchy. The following table shows the valuation technique used in measuring the fair value of investment property, as well as the significant unobservable inputs used:

Type		Valuation technique
Commercial properties of EUR 615 thousand	Of EUR 274 thousand	Comparative value technique: the fair value was based on the results of comparable sales of similar buildings.
	Of EUR 47 thousand	Comparative value technique: the fair value was based on the results of comparable sales of similar buildings as well as income method applying capitalization calculation manner.
	Of EUR 294 thousand	Income method (discounted cash flow method).
Residential properties of EUR 607 thousand	Of EUR 607 thousand	Comparative value technique: the fair value was based on the results of comparable sales of similar buildings.
Other properties of EUR 21 thousand	Of EUR 21 thousand	Comparative value technique: the fair value was based on the results of comparable sales of similar buildings.
Agricultural land plots of EUR 176 thousand	Of EUR 176 thousand	Comparative value technique: the fair value was based on the results of comparable sales of similar land plots.
Residential land plots of EUR 1,198 thousand	Of EUR 1,198 thousand	Comparative value technique: the fair value was based on the results of comparable sales of similar land plots.
Other land plots of EUR 401 thousand	Of EUR 401 thousand	Comparative value technique: the fair value was based on the results of comparable sales of similar land plots.

(All amounts in EUR thousand unless otherwise stated)

Note 12 Investment in subsidiaries

The main activities of established subsidiaries are real estate management and development.

In 2018, the operating result of subsidiaries was a loss of EUR 1,119 thousand (loss of EUR 1,440 thousand in 2017), which was mainly affected by the loss of EUR 718 thousand (EUR 918 thousand in 2017) from the sale and the revaluation of the repossessed assets.

	The Bank 2018	The Bank 2017
Balance at the beginning of the year	**6,439**	**14,494**
Additions	2,201	764
Disposal (nominal value)	-	(13,056)
Reversal of impairment of the disposed assets	-	5,377
Additional impairment of investment in subsidiaries	(1,119)	(1,140)
	1,082	(8,055)
Balance at the end of the year	**7,521**	**6,439**

Balance as at 31 December 2018	**Ownership (%)**	**Direct ownership (%)**	**Nominal amount**	**Impairment**	**Carrying value**
UAB MB Turtas	100	22.46	753	(489)	264
UAB MB Valda	100	32.52	1,150	(314)	836
UAB MB Investicija	100	47.94	1,481	(469)	1,012
UAB TG Invest-1	100	73.22	3,587	(938)	2,649
SIA Nida capital	100	100	850	(324)	526
UAB Saugus Kreditas	100	100	2,265	(31)	2,234
Total			**10,086**	**(2,565)**	**7,521**

Balance as at 31 December 2017	**Ownership (%)**	**Direct ownership (%)**	**Nominal amount**	**Impairment**	**Carrying value**
UAB MB Turtas	100	22.46	753	(304)	449
UAB MB Valda	100	32.52	1,150	(116)	1,034
UAB MB Investicija	100	47.94	1,481	(150)	1,331
UAB TG Invest-1	100	73.22	3,587	(547)	3,040
SIA Nida Capital	100	100	850	(298)	552
UAB Saugus Kreditas	100	100	64	(31)	33
Total			**7,885**	**(1,446)**	**6,439**

Fair value evaluation of investment in subsidiaries

The Bank tests investments in its subsidiaries for impairment when impairment indicators are identified. The Bank applies the adjusted net asset method for evaluation of the fair value of its subsidiaries. The value of the investment property owned by subsidiaries and specified in external valuation reports is adjusted by a certain coefficient defined by the management of the Bank depending on the type of the investment property and associated risks (see Note 11).

Adjustments are recorded when estimation of the fair value of investment in subsidiaries indicates impairment of the Bank's investment.

(All amounts in EUR thousand unless otherwise stated)

Note 13 Other assets

Other assets comprise:

The Group 31 December 2018	The Group 31 December 2017		The Bank 31 December 2018	The Bank 31 December 2017
308	2,006	Prepayments	291	1,997
46	484	Receivables from customers	11	223
145	80	Receivable value added tax	145	56
120	108	Deferred expenses	120	108
66	209	Other	54	183
685	2,887		621	2,567
-	(38)	Less: impairment for losses from receivables	-	(38)
685	**2,849**	**Other assets**	**621**	**2,529**

Note 14 Derivative financial instruments

The Bank and the Group

31 December 2018	**Notional amount Purchase**	**Fair value Assets**	**Fair value Liabilities**
Foreign exchange forwards (EUR)	7,836	22	2
Foreign exchange swaps (EUR)	2,468	19	1
Foreign exchange swaps (NOK)	311	-	1
Foreign exchange forwards (USD)	297	-	1
		41	**5**

The Bank and the Group

31 December 2017	**Notional amount Purchase**	**Fair value Assets**	**Fair value Liabilities**
Foreign exchange forwards (EUR)	7,321	7	19
Foreign exchange swaps (EUR)	2,100	-	12
Foreign exchange swaps (DKK)	202	-	-
		7	**31**

As at 31 December 2018, the Group and the Bank have pledged term deposits with the carrying amount of EUR 1,181 thousand (EUR 1,209 thousand as at 31 December 2017) for the foreign exchange forward agreements.

Bank uses FX forwards and FX swaps as hedge instruments, without applying the hedge account technique.

The Group 2018	The Group 2017		The Bank 2018	The Bank 2017
(20)	44	Realised result from swaps	(20)	44
18	80	Realised result from foreign exchange forwards	18	80
16	(12)	Unrealised result from swaps	16	(12)
19	(12)	Unrealised result from foreign exchange forwards	19	(12)
33	**100**	**Net gain (loss) from operations with derivative financial instruments**	**33**	**100**

(All amounts in EUR thousand unless otherwise stated)

Note 15 Due to banks and other credit institutions

The Group			The Bank	
31 December 2018	31 December 2017		31 December 2018	31 December 2017
-	3,000	Deposits CB (ECB Open market operations)	-	3,000
228	600	Current accounts and overnight deposits	228	600
228	**3,600**	**Amounts due to banks and other credit institutions**	**228**	**3,600**

As at 31 December 2018, interest rates on amounts due to banks and other credit institutions were 0% (0% at 31 December 2017).

Break-down by maturities and contractual interest rates of the amounts due to banks and other credit institutions:

				31 December 2018	
Country	**Currency of issue**	**Maturity**	**Interest rate**	**The Bank**	**The Group**
Lithuania	EUR	-	0.00	-	-
Total				**-**	**-**

				31 December 2017	
Country	**Currency of issue**	**Maturity**	**Interest rate**	**The Bank**	**The Group**
Lithuania	EUR			600	600
Lithuania	EUR	2,020	0.00	3,000	3,000
Total				**3,600**	**3,600**

28 June 2018 EUR 3,000 thousand was repaid earlier to the ECB, funds were raised through the ECB's longer-term targeted refinancing operations. For the period from 29 June 2016 the ECB paid 0.4% the annual interest rate to the Bank as a result of meeting longer-term targeted refinancing operation conditions.

Securities amounting to EUR 6,291 thousand (31 December 2017: EUR 8,188 thousand) and loans receivable amounting to EUR 1,364 thousand (31 December 2017: EUR 1,368 thousand) were held to secure the loan from targeted longer-term refinancing operations (Note 7 and Note 8).

Note 16 Due to customers

Amounts due to customers comprise:

The Group			The Bank	
31 December 2018	31 December 2017		31 December 2018	31 December 2017
167,271	165,306	Term deposits	167,271	165,306
109,754	77,025	Current accounts	111,361	78,090
12,101	9,524	Loans from funds	12,101	9,524
289,126	**251,855**	**Amounts due to customers**	**290,733**	**252,920**
18,475	**13,997**	**Out of which held as security against guarantees and loans**	**18,475**	**13,997**

As at 31 December 2018, amounts due to ten largest customers of the Bank amounted to EUR 22,137 thousand or 7.61% of the Bank's deposit holders (EUR 20,566 thousand or 8.13% in 2017).

(All amounts in EUR thousand unless otherwise stated)

Note 16 Due to customers (cont'd)

Amounts due to customers include accounts with the following types of customers:

	The Bank			
	31 December 2018		31 December 2017	
	Current accounts	Term deposits	Current accounts	Term deposits
Deposits				
Government departments and state-owned enterprises	3,405	663	2,732	560
Financial institutions	2,397	2,289	1,700	5,002
Corporate enterprises	63,426	5,496	37,984	6,201
Households	42,133	158,823	35,674	153,543
Amounts due to customers	**111,361**	**167,271**	**78,090**	**165,306**
	Loans			
	Short-term	**Long-term**	**Short-term**	**Long-term**
Lending funds				
UAB „Investicijų ir verslo garantijos“	-	12,101	-	9,426
Rural Credit Guarantee Fund (UAB Žemės Ūkio Paskolų Garantijų Fondas)	-	-	-	98
	-	**12,101**	**-**	**9,524**
Amounts due to customers	**111,361**	**179,372**	**78,090**	**174,830**

	The Group			
	31 December 2018		31 December 2017	
	Current accounts	Term deposits	Current accounts	Term deposits
Deposits				
Government departments and state-owned enterprises	3,405	663	2,732	560
Financial institutions	2,163	2,289	1,700	5,002
Corporate enterprises	62,053	5,496	37,984	6,201
Households	42,133	158,823	35,674	153,543
Amounts due to customers	**109,754**	**167,271**	**78,090**	**165,306**
	Loans			
	Short-term	**Long-term**	**Short-term**	**Long-term**
Lending funds				
UAB „Investicijų ir verslo garantijos“	-	12,101	-	9,426
Rural Credit Guarantee Fund (UAB Žemės Ūkio Paskolų Garantijų Fondas)	-	-	-	98
	-	**12,101**	**-**	**9,524**
Amounts due to customers	**109,754**	**179,372**	**78,090**	**174,830**

(All amounts in EUR thousand unless otherwise stated)

Note 17 Subordinated loans and debt securities (the Bank)

Subordinated loans

In November 2016 the Bank received a subordinated loan of EUR 1 million from the major shareholder of the Bank. The term of the subordinated loan is until 1 December 2023 with a fixed 2 percent annual interest rate.

According to the regulations of the Board of the Bank of Lithuania, the Bank had a permission to include this subordinated loan in the Bank's Tier 2 capital.

Debt securities issued

In July 2018 bank have issued subordinated debt securities emission. As of 31 December 2018 net value of issued debt securities is EUR 2,167 thousand. From 1 August 2018 debt securities of UAB Medicinos bankas are listed in Nasdaq stock exchange – ISIN code LT0000432114 (ticker: OPMB070025A).

UAB Medicinos bankas debt securities issue value – 2,210,000 EUR. Nominal value – 1,000 EUR. Coupon – 7%, coupon payment twice a year. Maturity date – 24 July 2025.

Note 18 Other liabilities

Other liabilities comprise:

The Group			The Bank	
31 December 2018	31 December 2017		31 December 2018	31 December 2017
829	510	Accrued payments to employees	809	510
59	30	Prepayments (advance payments)	1,796	-
121	142	Accrued expenses	121	130
77	158	Deferred income	77	158
215	184	Fee payable to the State Social Insurance Board	215	184
19	30	Payable to the Latvian Road Transport Administration	19	30
115	-	Debt to customers	94	-
247	204	Other	237	140
1,682	**1,258**	**Other liabilities**	**3,368**	**1,152**

Note 19 Shareholders' equity

As at 31 December 2018 and 2017, the share capital of the Group and the Bank consisted of 137,750 ordinary shares with the par value of EUR 144.81 each. All shares are issued, authorised and fully paid. The shares are not listed.

Each share has the right, equally, to vote, to dividends and to participate in residual assets in the event of a winding-up.

Other reserves of the Group and the Bank were as follows:

The Group			The Bank	
31 December 2018	31 December 2017		31 December 2018	31 December 2017
2,528	2,528	Special reserve to cover possible losses	2,528	2,528
184	141	Legal reserve	184	141
5,466	3,657	Reserve capital	5,466	3,657
8,178	**6,326**	**Total other reserves**	**8,178**	**6,326**

(All amounts in EUR thousand unless otherwise stated)

Note 19 Shareholders' equity (cont'd)

Nature and purpose of reserves

Legal reserve

The Bank's legal reserve amounted to EUR 184 thousand as at 31 December 2018 (EUR 141 thousand as at 31 December 2017). A legal reserve is a compulsory reserve under Lithuanian legislation. Annual transfers of not less than 5% of net profit are compulsory until the reserve reaches 10% of the share capital. The legal reserve can be used to cover the Bank's operating losses and for share capital increase.

Reserve capital

The Bank's and the Group's reserve capital amounting to EUR 5,466 thousand as at 31 December 2018 (EUR 3,657 thousand as at 31 December 2016) is created from additional shareholders' contributions and the profit of the Bank. The purpose of the reserve capital is to guarantee the financial stability of the Bank. The reserve capital can be used to cover the Bank's operating losses and for share capital increase.

Special reserve to cover possible losses

The Bank has created a special reserve to cover possible losses, which could be used to cover future possible losses.

Revaluation reserve of property and equipment

The revaluation reserve of property and equipment is used to record increase in the fair value of buildings and decreases to the extent that such decrease relates to an increase on the same asset previously recognised in equity.

Note 20 Contractual commitments and contingencies

The contractual commitments and contingencies comprise the following:

The Group			The Bank	
31 December 2018	**31 December 2017**		**31 December 2018**	**31 December 2017**
		Credit related commitments and guarantees		
8,876	8,994	Credit related commitments	8,876	8,994
2,022	763	Guarantees	2,022	763
10,898	**9,757**		**10,898**	**9,757**
(6 993)	(638)	Less: cash held as security against letters of credit and guarantees	(6 993)	(638)
3,905	**9,119**	**Total credit related commitments and guarantees**	**3,905**	**9,119**
		Operating lease commitments		
596	448	Not later than 1 year	581	437
854	841	Later than 1 year but not later than 5 years	854	841
20	40	Later than 5 years	20	40
1,470	**1,329**	**Total operating lease commitments**	**1,455**	**1,318**

In 2018 the Bank's and the Group's operating lease expenses (rent of premises) amounted to EUR 760 thousand (EUR 779 thousand in 2017).

Contingent tax liabilities

The tax authorities have not carried out a full-scope tax audit of the Bank for the period from 2011 to 2018. The tax authorities may at any time during 5 successive years after the end of the reporting tax year carry out an inspection of the Bank's books and accounting records and impose additional taxes or fines. Management is not aware of any circumstances that might result in a potential material liability in this respect.

The State Tax Inspectorate carried an inspection for the period from 01/01/2012 until 31/12/2013.

(All amounts in EUR thousand unless otherwise stated)

Note 20 Contractual commitments and contingencies (cont'd)

Insurance

The Group is a member of the obligatory deposit insurance system. The system operates under the Lithuanian legislation and is governed by State Company Deposit and Investment Insurance (Indėlių ir Investicijų Draudimas VĮ). The insurance covers the Bank's liabilities to natural persons and legal entities for the amount of up to EUR 100,000 for each individual in case of business failure.

Note 21 Net interest income

The Group			The Bank	
2018	**2017**		**2018**	**2017**
7,341	6,474	On loans to customers	7,213	6,411
545	552	On impaired loans to customers	545	552
562	456	Leasing	562	456
180	130	Delinquency	178	130
539	577	On held-to-maturity investments	539	577
76	35	On placements with the banks and other credit institutions	76	35
9,243	**8,224**	**Interest revenue**	**9,113**	**8,161**
(1,196)	(954)	On obligations to customers, including letters of credit	(1,196)	(954)
(264)	(499)	Deposit insurance	(264)	(499)
(20)	(20)	On subordinated loans	(20)	(20)
(75)	-	For Debt securities	(75)	-
(20)	-	Loan portfolio guarantee insurance	(20)	-
(167)	(85)	On obligations to banks and other credit institutions	(167)	(85)
(1,742)	**(1,558)**	**Interest expenses**	**(1,742)**	**(1,558)**
7,501	**6,666**	**Net interest income**	**7,371**	**6,603**

In 2018 and 2017 the Bank received income from delinquency charges of EUR 178 thousand and EUR 130 thousand respectively, accounted for under the line delinquency. The major part of the income from delinquency charges is related with the cover of non-performing loans. The Bank recognises delinquency charges only when it is aware that the income from delinquency charges will be received.

Note 22 Net service fee and commission income

Net fee and commission income comprise:

The Group			The Bank	
2018	**2017**		**2018**	**2017**
2,141	771	Payment services	2,141	771
456	387	Commission income from currency exchange	456	387
502	248	Administration of bank accounts	502	248
1,271	1,231	Collection of payments	1,271	1,231
383	522	Brokerage income	383	522
536	462	Cash operations	536	462
385	121	Other	386	125
5,674	**3,742**	**Service fee and commission income**	**5,675**	**3,746**
(72)	(110)	Rent fee according to agreements	(72)	(110)
(256)	(232)	Cash operations	(256)	(232)
(107)	(108)	Other	(83)	(93)
(435)	**(450)**	**Service fee and commission expense**	**(411)**	**(435)**
5,239	**3,292**	**Net service fee and commission income**	**5,264**	**3,311**

(All amounts in EUR thousand unless otherwise stated)

Note 23 Net profit (loss) on securities trading

The Group 2018	The Group 2017		The Bank 2018	The Bank 2017
-	10	Realised gain (loss)	-	10
-	(1)	Unrealised gain (loss)	-	(1)
-	**9**	**Net profit (loss) on securities trading**	**-**	**9**

Note 24 Net foreign exchange gain

The Group 2018	The Group 2017		The Bank 2018	The Bank 2017
4,746	4,043	Gain on dealing in foreign currencies	4,746	4,043
(82)	(221)	Revaluation of items in statement of financial position, net	(82)	(221)
4,664	**3,822**	**Net foreign exchange gain**	**4,664**	**3,822**

Note 25 Net result on operations with investment property

The Group 2018	The Group 2017		The Bank 2018	The Bank 2017
138	(294)	Realised gain (loss)	(33)	(11)
(1,131)	(680)	Changes in fair value	(242)	(45)
(993)	**(974)**	**Net result on operations on investment property**	**(275)**	**(56)**

For more details on changes in the fair value for investment property see Note 12.

Note 26 Other income (expenses)

The Group 2018	The Group 2017		The Bank 2018	The Bank 2017
13	136	Income from real estate disposal	13	136
12	83	Income from disposal of claim right	-	-
-	15	Insurance benefit	-	-
28	10	Rental revenue	18	10
-	-	Intergroup income	11	20
10	-	Fines received	10	-
106	89	Other income (expenses)	74	20
169	**333**	**Total other income (expenses)**	**126**	**186**

Note 27 Impairment of loans and other financial assets

The Group 2018	The Group 2017		The Bank 2018	The Bank 2017
(1,240)	(772)	Impairment loss on loans and receivables	(1,235)	(725)
(188)	6	Impairment loss on leasing	(188)	6
115	533	Recovery of loans previously written-off	115	533
(1,313)	**(233)**	**Total impairment of loans and other financial assets**	**(1,308)**	**(186)**

(All amounts in EUR thousand unless otherwise stated)

Note 27 Impairment of loans and other financial assets (cont'd)

Impairment loss on loans and receivables for the year 2018 and 2017 by main factors is as follows:

The Group			The Bank	
2018	**2017**		**2018**	**2017**
(1,273)	(733)	Due to changes of collateral value	(1,273)	(733)
207	329	Due to changes of cash flow	195	329
(135)	(74)	Due to postponement of collateral realization (time effect)	(135)	(74)
(92)	(254)	Loss of expected cash flow	(92)	(208)
(24)	(143)	Administrative expenses	(24)	(143)
(80)	147	Impairment for general loan portfolio credit risk	(62)	148
115	533	Cash flow (recovery) from written-off loans	115	533
(31)	(38)	Other factors	(32)	(38)
(1,313)	**(233)**	**Total impairment loss on loans and receivables**	**(1,308)**	**(186)**

Impairment expenses for the year 2018 and 2017 by industry sectors are as follows:

The Group			The Bank	
2018	**2017**		**2018**	**2017**
(403)	174	Real estate operations	(403)	174
(185)	(355)	Individuals	(180)	(308)
(9)	(228)	Manufacturing	(9)	(228)
(15)	(22)	Real estate constructions	(15)	(22)
(443)	(5)	Services	(443)	(5)
(273)	168	Trading enterprises	(273)	168
(2)	3	Agriculture and food processing	(2)	3
33	(6)	Transport	33	(6)
(1)	8	Energy	(1)	8
(14)	-	Financial services	(14)	-
(1)	30	Local government	(1)	30
(1,313)	**(233)**	**Total impairment of loans and other financial assets**	**(1,308)**	**(186)**

(All amounts in EUR thousand unless otherwise stated)

Note 28 Operating expenses

Salaries and benefits and other operating expenses are as follows:

The Group 2018	The Group 2017		The Bank 2018	The Bank 2017
		Salaries and benefits		
(6,048)	(5,169)	Salaries and bonuses	(5,820)	(5,048)
(1,818)	(1,608)	Social security costs	(1,746)	(1,570)
(7,866)	**(6,777)**	**Total salaries and benefits**	**(7,566)**	**(6,618)**
		Other operating expenses		
(862)	(854)	Occupancy and rent	(843)	(853)
(605)	(335)	Office supplies	(605)	(335)
(354)	(449)	Expenses for service providers for the bank	(354)	(449)
(547)	(538)	Taxes other than income tax	(503)	(450)
(250)	(296)	Communication	(250)	(296)
-	(53)	Debt recovery costs	-	(53)
(427)	(193)	Transportation expenses	(427)	(193)
(96)	(107)	Expenses related with investment property	(28)	(17)
(98)	(100)	Security	(98)	(100)
(227)	(113)	Marketing and advertising	(219)	(113)
(40)	(43)	Legal and consultancy	(40)	(43)
(27)	(97)	Personnel training	(26)	(97)
(46)	(38)	Representation	(46)	(38)
(63)	(30)	Building repair costs	(63)	(30)
(72)	(74)	Team building event costs	(72)	(74)
(10)	(14)	Charity and support costs	(10)	(14)
(9)	(7)	Business travel and related	(9)	(7)
-	(235)	Fine Imposed by the Bank of Lithuania	-	(235)
(37)	(103)	Disposable items	(37)	(103)
(30)	(28)	Stationary supplies	(30)	(28)
(113)	(67)	Insurance expenses	(113)	(67)
(23)	(18)	Participation fees	(23)	(18)
(193)	(80)	Accounting and brokerage services	(193)	(80)
(283)	(151)	Other	(147)	(83)
4,412	**(4,023)**	**Total other operating expenses**	**4,136**	**(3,776)**

(All amounts in EUR thousand unless otherwise stated)

Note 29 Income tax

The Group's and the Bank's income tax is specified below:

The Group 2018	The Group 2017		The Bank 2018	The Bank 2017
(16)	(7)	Current income tax expenses	(16)	(7)
27	-	Change in deferred income tax	27	-
11	**(7)**	**Total income tax income (expenses)**	**11**	**(7)**
		Components of deferred income tax		
		Deferred income tax assets:		
2,186	2,862	Tax loss carried forward	1,925	2,358
19	18	Accruals	19	18
78	37	Collective impairment for loans	78	37
2,283	**2,917**	**Deferred income tax assets**	**2,022**	**2,413**
(261)	(867)	Less: not recognised part of deferred tax asset	-	(363)
2,022	**2,050**	**Deferred income tax assets**	**2,022**	**2,050**
		Deferred income tax liabilities:		
(60)	(60)	Revaluation of property and equipment	(60)	(60)
(37)	(93)	Other	(37)	(93)
(97)	**(153)**	**Deferred income tax liabilities**	(97)	**(153)**
1,925	**1,897**	**Deferred income tax, net**	**1,925**	**1,897**
		Deferred tax income (expense) recognised:		
1	1	In the statement of OCI	1	1
27	1	In the income statement	27	1

Deferred income tax assets are recognised for tax loss carried forward to the extent that realization of the related tax benefit through future taxable profits is probable. Deferred tax assets on tax losses carried forward of EUR 820 thousand at the Bank and EUR 5,167 thousand at the Group have not been recognised because of realisation uncertainty.

Deferred tax components related to revaluation of available-for-sale financial instruments and revaluation of property and equipment are accounted for in equity.

(All amounts in EUR thousand unless otherwise stated)

Note 29 Income tax (cont'd)

Amounts recognised in other comprehensive income

The Bank (Group)

	2018			2017		
	Before tax	**Tax (expense) benefit**	**Net of tax**	**Before tax**	**Tax (expense) benefit**	**Net of tax**
Revaluation of property and equipment	-	-	-	(3)	-	(3)
Available-for-sale investment securities	-	-	-	-	-	-
Total	**-**	**-**	**-**	**(3)**		**(3)**

Reconciliation of effective tax rate

The income tax expense, applicable to the result of the current year, can be reconciled with the income tax expenses calculated using statutory income tax rate for the pre-tax income as follows:

The Group 2018		The Group 2017			The Bank 2018		The Bank 2017	
	2,375		1,633	Profit before tax		2,424		1,654
15%	356	15%	245	Profit tax calculated at 15% tax rate	15%	364	15%	248
(10)%	(227)	(105)%	(1,708)	Non-taxable income	(4)%	(92)	(94)%	(1,561)
16%	383	92%	1,529	Non-deductible expenses	14%	343	102%	1,682
-	-	-	-	Change in unrecognised deferred tax asset	-	-	-	-
(25)%	(600)	(22)%	(363)	Utilisation of tax losses carried forward	(17)%	(419)	(16)%	(258)
-	-	-	-	Utilisation of tax losses of the subsidiaries	(8)%	(180)	(6)%	(105)
(4)%	(104)	18%	304	Current year tax losses for which no deferred tax asset is recognised	-	-	-	-
-	-	-	-	Recognition of previously unrecognised tax losses	-	-	-	-
(0)%	**(16)**	**(0)%**	**(7)**	**Total income tax (income) expenses**	**(0)%**	**(16)**	**(0)%**	**(7)**

(All amounts in EUR thousand unless otherwise stated)

Note 29 Income tax (cont'd)

Movement in deferred tax balances

The Bank (Group)

				Balance at 31 December 2018		
	Net balance at 1 January	Recognised in profit or loss	Recognised in OCI	Net	Deferred tax assets	Deferred tax liabilities
Property and equipment	(60)	-	1	(59)	-	(59)
Available-for-sale securities	-	-	-	-	-	-
Tax loss carry-forwards	1,996	(71)	-	1,925	1,925	-
Other tax assets	54	43	-	97	97	-
Other tax liabilities	(93)	55	-	(38)	-	(38)
Total	**1,897**	**27**	**1**	**1,925**	**2,022**	**(97)**

				Balance at 31 December 2017		
	Net balance at 1 January	Recognised in profit or loss	Recognised in OCI	Net	Deferred tax assets	Deferred tax liabilities
Property and equipment	(61)	-	1	(60)	-	(60)
Available-for-sale securities	-	-	-	-	-	-
Tax loss carry-forwards	1,940	56	-	1,996	1,996	-
Other tax assets	48	6	-	54	54	-
Other tax liabilities	(30)	(63)	-	(93)	-	(93)
Total	**1,897**	**(1)**	**1**	**1,897**	**2,050**	**(153)**

Note 30 Cash and cash equivalents

Cash and cash equivalents for the purpose of the statement of cash flows comprise:

The Group			The Bank	
31 December 2018	31 December 2017		31 December 2018	31 December 2017
27,304	24,478	Cash on hand	27,304	24,478
27,790	27,099	Current accounts with the Bank of Lithuania	27,790	27,099
12,099	6,929	Current accounts with other credit institutions	12,058	6,886
1,181	4,544	Term deposits with credit institutions up to 90 days	1,181	4,544
68,374	**63,050**	**Cash and cash equivalents**	**68,333**	**63,007**

Note 31 Fair values of financial instruments

Fair value is defined as the amount at which the instrument could be exchanged in a current transaction between knowledgeable willing parties on arm's length conditions, other than in a forced transaction, involuntary liquidation or distress sale. As no readily available market exists for a large part of the Bank's and the Group's financial instruments, judgment is necessary in arriving at a fair value, based on current economic conditions and the specific risks attributable to the instrument.

For financial assets and financial liabilities that have a short-term maturity (less than three months) it is assumed that the carrying amounts approximate their fair value. This assumption is also applied to variable rate financial instruments, as the Group and the Bank did not identify significant increases in credit spreads.

The fair value of fixed rate financial assets and liabilities carried at amortised cost are estimated by comparing market interest rates when they were first recognised with current market rates offered for similar financial instruments. The estimated fair value of fixed interest-bearing loans and deposits is based on discounted cash flow using prevailing market interest rates for debts with similar credit risk and maturity.

The following describes the methodologies and assumptions used to determine the fair value for those financial instruments:

Cash. Represents cash on hand for which the carrying amount is its fair value.

(All amounts in EUR thousand unless otherwise stated)

Note 31 Fair values of financial instruments (cont'd)

Balances with the Central Bank. The carrying amount equals to the fair value as these are current accounts at the Bank of Lithuania.

Financial assets at fair value through profit or loss and available-for-sale financial assets. The carrying amount is the fair value of such investments.

Held-to-maturity investments. Their fair value was calculated based on market quotations.

Amounts due from and to credit institutions. For assets maturing within three months, the carrying amount approximates the fair value due to the relatively short-term maturity of these financial instruments. For longer-term deposits, due to the re-pricing of assets to the market interest rates, the interest rates applicable approximate market rates and, consequently, the fair value approximate the carrying amounts.

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

Amounts due to customers. For balances maturing within three months the carrying amount approximates the fair value due to the relatively short maturity of these financial instruments. For longer term fixed interest-bearing deposits and other borrowings the estimated fair value is based on discounted cash flows using interest rates for new debts with similar remaining maturity and credit quality.

Debt securities issued and subordinated loan. The fair value is calculated discounting of scheduled future cash flows using current market rates.

In the table below the carrying amounts and fair values of financial instruments which are not carried at fair value in the financial statements are presented. This table does not include the fair values of non-financial assets and non-financial liabilities.

The Bank	2018		2017	
	Carrying value	Fair value	Carrying value	Fair value
Financial assets				
Cash and due from central bank	57,374	57,374	53,520	53,520
Placements with banks and other credit institutions	13,239	13,239	11,496	11,496
Held-to-maturity investments	70,746	71,512	39,860	40,462
Loans and receivables	169,795	173,082	163,454	167,120
Other assets	621	621	2,529	2,529
Total financial assets	**311,775**	**315,828**	**270,859**	**275,127**
Financial liabilities				
Due to banks and other credit institutions	228	228	3,600	3,600
Due to customers, including letters of credit	290,734	292,342	252,920	254,196
Debt securities issued	2,167	3,176	-	-
Subordinated loans	1,000	1,000	1,000	1,000
Other liabilities	3,367	3,367	1,152	1,152
Total financial liabilities	**297,496**	**300,113**	**258,672**	**259,948**

The Group	2018		2017	
	Carrying value	Fair value	Carrying value	Fair value
Financial assets				
Cash and due from central bank	57,374	57,374	53,520	53,520
Placements with banks and other credit institutions	13,280	13,280	11,539	11,539
Held-to-maturity investments	70,746	71,512	39,860	40,462
Loans and receivables	171,826	175,113	163,678	167,344
Other assets	685	685	2,849	2,849
Total financial assets	**313,911**	**317,964**	**271,446**	**275,714**
Financial liabilities				
Due to banks and other credit institutions	228	228	3,600	3,600
Due to customers, including letters of credit	289,126	290,735	251,855	253,131
Debt securities issued	2,167	3,176	-	-
Subordinated loans	1,000	1,000	1,000	1,000
Other liabilities	1,682	1,682	1,258	1,258
Total financial liabilities	**294,203**	**296,821**	**257,713**	**258,989**

(All amounts in EUR thousand unless otherwise stated)

Note 31 Fair values of financial instruments (cont'd)

Financial instruments which are carried at fair value in the financial statements are distributed by 3 levels:

Level 1: quoted (unadjusted) prices in active markets for identical assets or liabilities;

Level 2: other techniques for which all inputs which have a significant effect on the recorded fair value are observable in the market, either directly or indirectly;

Level 3: techniques which use inputs which have a significant effect on the recorded fair values that are not based on observable market data.

The fair value of all Bank contracted derivatives is defined as Level 2. These are mainly FX swaps and derivatives which are revaluated using discounted cash flow or present value calculation method. In all cases revaluation is based on market observable inputs. Debt securities are priced in accordance to market quotes and, in cases when there is no active market for particular security, the price for this kind of security is determined with the reference to market observable inputs. As at 31 December 2018 and 2017, due to absence of active market, bonds issued by other Lithuanian and foreign banks were classified under Level 2. There were no movements of financial instruments between Level 1 and Level 2 in 2018 and 2017.

The following table shows an analysis of financial instruments recorded at fair value by the level of the fair value hierarchy:

The Bank (Group)

As at 31 December 2018	**Level 1**	**Level 2**	**Level 3**	**Total**
Financial assets				
Derivative financial instruments	-	41	-	41
Financial assets designated at fair value through profit or loss	-	-	-	-
Available-for-sale financial assets	-	-	-	-
Financial liabilities				
Derivative financial instruments	-	5	-	5

As at 31 December 2017	**Level 1**	**Level 2**	**Level 3**	**Total**
Financial assets				
Derivative financial instruments	-	7	-	7
Financial assets designated at fair value through profit or loss	-	-	-	-
Available-for-sale financial assets	-	-	-	-
Financial liabilities				
Derivative financial instruments	-	31	-	31

(All amounts in EUR thousand unless otherwise stated)

Note 31 Fair values of financial instruments (cont'd)

Financial instruments not measured at fair value

The following table sets out financial instruments not measured at fair value and analyses them by the level in the fair value hierarchy.

The Bank

31 December 2018	**Level 1**	**Level 2**	**Level 3**	**Total carrying amount**
Assets				
Cash and due from banks	57,374	13,239	-	70,613
Held-to-maturity investments	-	70,746	-	70,746
Loans to customers	-	153,042	2,462	155,504
Receivables with deferred payment	-	-	-	-
Loans to financial institutions	-	1,482		1,482
Receivables from leasing	-	10,956	1,853	12,809
Other assets	-	621	-	621
Total financial assets	**57,374**	**250,086**	**4,315**	**311,775**
Liabilities				
Due to banks and other credit institutions	-	228	-	228
Due to customers	-	290,733	-	290,733
Debt securities issued	-	2,167	-	2,167
Subordinated loan		1,000		1,000
Other liabilities	-	3,368	-	3,368
Total financial liabilities		**297,496**		**297,496**

31 December 2017	**Level 1**	**Level 2**	**Level 3**	**Total carrying amount**
Assets				
Cash and due from banks	53,520	11,496	-	65,016
Held-to-maturity investments	-	39,860	-	39,860
Loans to customers	-	137,910	9,213	147,123
Receivables with deferred payment	-	2,657	-	2,657
Loans to financial institutions	-	1,835		1,835
Receivables from leasing	-	11,821	18	11,839
Other assets	-	2,529	-	2,529
Total financial assets	**53,520**	**208,108**	**9,231**	**270,859**
Liabilities				
Due to banks and other credit institutions	-	3,600	-	3,600
Due to customers	-	252,920	-	252,920
Debt securities issued	-	-	-	-
Subordinated loans		1,000		1,000
Other liabilities	-	1,152	-	1,152
Total financial liabilities	-	**258,672**	**-**	**258,672**

(All amounts in EUR thousand unless otherwise stated)

Note 31 Fair values of financial instruments (cont'd)

Financial instruments not measured at fair value

The Group

31 December 2018	**Level 1**	**Level 2**	**Level 3**	**Total carrying amount**
Assets				
Cash and due from banks	57,374	13,280	-	70,654
Held-to-maturity investments	-	70,746	-	70,746
Loans to customers	-	154,805	2,504	157,309
Receivables with deferred payment	-	226	-	226
Loans to financial institutions	-	1,482	-	1,482
Receivables from leasing	-	10,956	1,853	12,809
Other assets	-	685	-	685
Total financial assets	**57,374**	**252,180**	**4,357**	**313,911**
Liabilities				
Due to banks and other credit institutions	-	228	-	228
Due to customers	-	289,126	-	289,126
Debt securities issued	-	2,167	-	2,167
Subordinated loan		1,000		1,000
Other liabilities	-	1,682	-	1,682
Total financial liabilities	**-**	**294,203**	**-**	**294,203**

31 December 2017	**Level 1**	**Level 2**	**Level 3**	**Total carrying amount**
Assets				
Cash and due from banks	53,520	11,539	-	65,059
Held-to-maturity investments	-	39,860	-	39,860
Loans to customers	-	138,017	9,263	147,280
Receivables with deferred payment	-	2,923	-	2,923
Loans to financial institutions	-	1,636	-	1,636
Receivables from leasing	-	11,821	18	11,839
Other assets	-	2,849	-	2,849
Total financial assets	**53,520**	**208,645**	**9,281**	**271,446**
Liabilities				
Due to banks and other credit institutions	-	3,600	-	3,600
Due to customers	-	251,855	-	251,855
Debt securities issued	-	-	-	-
Subordinated loans		1,000		1,000
Other liabilities	-	1,258	-	1,258
Total financial liabilities	**-**	**257,713**	**-**	**257,713**

The following table shows the valuation techniques used by the Bank and the Group in measuring Level 2 and Level 3 fair values (where the fair value differs from the carrying amount), as well as the significant unobservable inputs used:

Type	**Valuation technique**	**Significant unobservable inputs**
Held-to-maturity investments	Discounted cash flows	Discount rates
Loans and receivables, loans to banks, loans to financial institutions, receivables from leasing	Discounted cash flows	Discount rates, default rates, expected lifetime
Due to customers	Discounted cash flows	Discount rates
Debt securities issued	Discounted cash flows	Discount rates
Subordinated loans	Discounted cash flows	Discount rates

(All amounts in EUR thousand unless otherwise stated)

Note 32 Related party transactions

Transactions between the Group and the Bank and their related parties, respectively, were performed on normal commercial terms and conditions as transactions with unrelated parties.

The outstanding balances of loans, term deposits and bonds issued at the year end, and related expense and income for the year are as follows:

The Bank, 2018	Shareholders	Subsidiaries	Key management personnel	Other*
Loans outstanding as at 31 December 2018, net	37	-	-	4,372
Interest rate,%	6.5828	-	-	2.0-4.5
Interest income on loans	1	1	1	120
Impairment of loans	-	-	-	(14)
Term deposits as at 31 December 2018	-	-	3	247
Interest expense on deposits	-	-	-	(2)
Interest rate,%	-	-	0.3	0.05–6.5
Demand accounts as at 31 December 2018	99	1,607	88	3,006
Bonds issued as at 31 December 2018	100	-	-	-
Interest expense on bonds	(3)	-	-	-
Interest rate,%	7	-	-	-
Subordinated loans as at 31 December 2018	1,000	-	-	-
Interest expense on subordinated loans	(20)	-	-	-
Interest rate,%	2	-	-	-
Service fee and commission revenue	1	2	-	17
Service fee and commission expenses	-	-	-	(3)
Other operating revenue	-	11	-	-
Other operating expenses	-	-	-	(59)

The Bank, 2017	Shareholders	Subsidiaries	Key management personnel	Other*
Loans outstanding as at 31 December 2017, net	-	199	42	1,296
Interest rate,%	-	5	0-4.0	4.0-4.5
Interest income on loans	-	3	1	144
Impairment of loans	-	-	-	-
Term deposits as at 31 December 2017	-	-	3	253
Interest expense on deposits	-	-	-	(3)
Interest rate,%	-	-	0.2-0.6	0.15–6.5
Demand accounts as at 31 December 2017	4	1,065	80	2,996
Bonds issued as at 31 December 2017	-	-	-	-
Interest expense on bonds	-	-	-	-
Interest rate,%	-	-	-	-
Subordinated loans as at 31 December 2017	1,000	-	-	-
Interest expense on subordinated loans	(20)	-	-	-
Interest rate,%	2	-	-	-
Service fee and commission revenue	1	-	-	14
Service fee and commission expenses	-	-	-	(3)
Other operating revenue	-	20	-	-
Other operating expenses	-	-	(40)	(95)

(All amounts in EUR thousand unless otherwise stated)

Note 32 Related party transactions (cont'd)

The Group, 2018	**Shareholders**	**Key management personnel**	**Other***
Loans outstanding as at 31 December 2018, net	37	-	4,372
Interest rate,%	6.5828	-	2.0-4.5
Interest income on loans	1	1	120
Impairment of loans	-	-	(14)
Term deposits as at 31 December 2018	-	3	247
Interest expense on deposits	-	-	(2)
Interest rate,%	-	0.3	0.05–6.5
Demand accounts as at 31 December 2018	99	88	3,006
Bonds issued as at 31 December 2018	100	-	-
Interest expense on bonds	(3)	-	-
Interest rate,%	7	-	-
Subordinated loans as at 31 December 2018	1,000	-	-
Interest expense on subordinated loans	(20)	-	-
Interest rate,%	2	-	-
Service fee and commission revenue	1	-	17
Service fee and commission expenses	-	-	(3)
Other operating revenue	-	-	-
Other operating expenses	-	-	(59)

The Group, 2017	**Shareholders**	**Key management personnel**	**Other***
Loans outstanding as at 31 December 2017, net	-	42	1,296
Interest rate,%	-	0–4.0	4.0–4.5
Interest income on loans	-	1	144
Impairment of loans	-	-	-
Term deposits as at 31 December 2017	-	3	253
Interest expense on deposits	-	-	(3)
Interest rate,%	-	0.2–0.6	0.15–6.5
Demand accounts as at 31 December 2017	4	82	2,994
Bonds issued as at 31 December 2017	-	-	-
Interest expense on bonds	-	-	-
Interest rate,%	-	-	-
Subordinated loans as at 31 December 2017	1,000	-	-
Interest expense on subordinated loans	(20)	-	-
Interest rate,%	2	-	-
Service fee and commission revenue	1	-	14
Service fee and commission expenses	-	-	(3)
Other operating revenue	-	-	-
Other operating expenses	-	(41)	(94)

* Other related parties are entities controlled by the members of the management of the Group and the Bank or shareholders of the Bank and other related parties.

(All amounts in EUR thousand unless otherwise stated)

Note 32 Related party transactions (cont'd)

The Group

Compensation of key management personnel comprised the following:

	2018	2017
Salaries and other short-term benefits	338	261
Social security costs	106	82
Total key management personnel compensation	**444**	**343**

Key management personnel include members of the board and administration and management of subsidiaries.

Note 33 Risk management

Risk is inherent in the Bank's and the Group's activities and 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 Bank's and the Group's continuing profitability and each individual within the Bank and the Group is accountable for the risk exposures relating to his or her responsibilities.

The Group and the Bank are exposed to credit risk, liquidity risk and market risk, it is also subject to operating risk.

<u>Risk management structure</u>

The Board of Directors is ultimately responsible for identifying and controlling risks; however, there are separate independent bodies responsible for managing and monitoring risks.

Board of Directors

The Board of Directors is responsible for the overall risk management approach and for approving the risk strategies and principles.

Supervisory Board

The Supervisory Board has the responsibility for monitoring the overall risk process within the Bank and the Group.

Risk Committee

The Risk Committee has the overall responsibility for the development of the risk strategy and implementing principles, frameworks, policies and limits. It is responsible for the fundamental risk issues and manages and monitors relevant risk decisions.

Audit Committee

Audit Committee periodically reviews efficiency of the Bank's internal control procedures, it coordinates and periodically assesses the work of internal audit, monitors and assesses internal and external auditor's reports.

Risk Department

The Risk Department is responsible for monitoring compliance with risk principles, policies and limits, across the Group and the Bank.

Bank Treasury

Bank Treasury is responsible for managing the Bank's assets and liabilities and the overall financial structure. It is also primarily responsible for the funding and liquidity risk of the Group and the Bank.

The Bank Audit Division

Risk management processes throughout the Group and the Bank are audited annually by the internal audit that examines both the adequacy of the procedures and the Bank's and the Group's compliance with the procedures. Internal Audit discusses the results of all assessments with management, and reports its findings and recommendations to the Audit Committee.

Note 33 Risk management (cont'd)

Risk measurement and reporting systems

The Group and the Bank apply credit risk management measures, which could relevantly be divided into two types:
1) Measures that help to avoid decisions to grant unwarrantably risky loans;
2) Measures ensuring the effective monitoring system of the Bank's asset quality.

Measures that help to avoid decisions to grant unwarrantably risky credits include:
1) Multi-stage decision-making and its approval system;
2) Risk allocation among structural levels – limit establishment;
3) Security measures for credit repayment (collateral).

Multi-stage decision-making and its approval system has an aim not to make one-man decisions regarding credit granting by authorized persons but to make them be discussed by the collegial bodies of the Bank and, as the case may be, by the Bank's Loan Committee, the Bank's Board or Council. There are certain limits to authorized persons established regarding credit granting implementation as well as approval limits to collegial bodies. Limit establishment depends on the authorized persons' qualification, experience and the effectiveness of their managed branches; while in the Branch Committees and the Bank Loan Committee the attention is paid to the Committee members' qualification, experience and economic activity of the region, where the branch is located, the quality of loan portfolio and other factors.

It is very important to precisely analyse all the information about the customer before granting the credit. The goal of credit analysis is to do the best in evaluating the customer's status and prospects in the field where he/she provides his/her goods or services. The repayment of credits granted by the Bank must be enough secure in order to minimize possible credit repayment risks. A security measure has to be chosen in accordance with the credit type. Providing credit first of all the Bank analyses the borrower's financial capacity and credit repayment possibilities from the borrower's cash flows.

Credit administration and constant credit monitoring is the main principle in the Bank's security and reliability maintenance. The proper credit administration includes the timely updating of the borrower's credit file, providing with the latest financial information, the timely introduction of latest financial information to the database and preparation of the various documents and their amendments.

The Bank's Credit Risk Department collects and, if necessary, provides to responsible managerial personnel information on external conditions, the growth of the credit portfolio and fulfilment of targeted profit, expenses associated with risks, the largest amounts due from clients, distribution of credits by the type of economic activity, repayment terms past due, the largest clients with default possibilities, analysis of the credit portfolio by risk groups, changes in risk groups over a certain time period.

The Bank establishes and implements the procedures, improves information systems for monitoring separate credits as well as loan portfolio. These procedures include the criteria for early indication of potentially impaired loans and other transactions.

Monitoring and controlling of risks are primarily performed based on limits established by the Group and the Bank. These limits reflect the business strategy and market environment of the Group and the Bank as well as the level of risk that the Bank or the Group is willing to accept.

Information compiled from all the business is examined and processed in order to analyse, control and identify early risks. This information is presented and explained to the Board of Directors, the Risk Committee and the head of each business division.

The report includes aggregate credit exposure, hold limit exceptions, liquidity ratios and risk profile changes. Senior management assesses the appropriateness of the allowance for credit losses on a quarterly basis. The Supervisory Board receives a comprehensive risk report once a quarter which is designed to provide all necessary information to assess and conclude on the risks of the Group and the Bank.

A daily briefing is given to the Board of Directors on the utilisation of market limits, analysis of proprietary investments and liquidity.

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Credit risk

Credit risk is the risk that the Group and the Bank will incur loss because their customers or counterparties failed to discharge their contractual obligations. The Group and the Bank manage and control credit risk by setting limits on the amount of risk they are willing to accept for individual counterparties and for industry concentrations, and by monitoring exposures in relation to such limits. The Group and the Bank have established a credit quality review process to provide early identification of possible changes in the creditworthiness of counterparties, including regular collateral revision. The credit quality review process allows the Group and the Bank to assess the potential loss to which it is exposed and to take corrective action. The Bank makes available to its customers guarantees which may require that the Bank makes payments on their behalf. They expose the Bank to similar risks as loans and these are mitigated by the same control processes and policies.

In cases, when cash flows of nonperforming loans are based on expected cash flows to be recovered from sale of collateral, value of the collateral is an important estimate in calculating impairment losses for loans and receivables. Sensitivity analysis of real estate market prices is presented in section *Market risk*.

Maximum exposure to credit risk without taking into account any collateral and other credit enhancement

The table below shows the maximum exposure to credit risk. The maximum exposure is shown in net value, before the effect of collateral agreements.

The Group			The Bank	
31 December 2018	**31 December 2017**		**31 December 2018**	**31 December 2017**
		Statement of financial position items, other than trading and investment activities		
30,070	29,042	Balances with the Bank of Lithuania	30,070	29,042
13,280	11,539	Due from banks	13,239	11,496
157,309	147,280	Loans to customers	155,504	147,123
226	2,923	Receivable with deferred payment	-	2,657
1,482	1,636	Loans to bank and financial institutions	1,482	1,835
12,809	11,839	Receivables from leasing	12,809	11,839
215,176	**204,259**		**213,104**	**203,992**
		Off balance sheet items		
2,022	763	Guarantees	2,022	763
8,876	8,994	Loan commitments	8,876	8,994
226,074	**214,016**	**Total balance and off-balance sheet items, other than trading and investment activities**	**224,002**	**213,749**
		Trading and investment activities		
		Financial assets at fair value through profit or loss		
41	*7*	*Derivative financial instruments*	*41*	*7*
-	-	Held-to-maturity investments	-	-
70,746	*39,860*	*Debt securities*	*70,746*	*39,860*
70,787	**39,867**	**Total trading and investment activities**	**70,787**	**39,867**
55	**170**	Other financial assets	**55**	**170**
296,916	**254,053**	**Total credit exposure**	**294,844**	**253,786**

The contractual amounts of commitments are set out in the following table by category. The amounts reflected in the table for commitments assume that amounts are fully advanced. The amounts reflected in the table for guarantees and letters of credit represent the possible maximum accounting loss that would be recognised at the reporting date if counterparties failed completely to perform as contracted.

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Credit risk (cont'd)

Maximum exposure to credit risk without taking into account any collateral and other credit enhancement (cont'd)

	31 December 2018 The Bank (Group)	31 December 2017 The Bank (Group)
Contracted amount		
Loan and credit line commitments	6,767	6,604
Undrawn overdraft facilities	2,109	2,390
Guarantees and letters of credit	2,022	763
Total	**10,898**	**9,757**

The total outstanding contractual commitments to extend credit indicated above does not necessarily represent future cash requirements, as these commitments may expire or terminate without being funded.

Restricted assets (pledged or otherwise restricted use):

	31 December 2018 The Bank (Group)	31 December 2017 The Bank (Group)
Due from banks	1,181	1,275
Debt securities	6,291	8,188
Loans issued	1,364	1,368
Total	**8,836**	**10,831**

Tables below present the breakdown of trading and investment activities by type and grade:

	The Bank (Group)	
	31 December 2018	31 December 2017
Government bonds	68,284	38,640
Regional government bonds	878	421
Multilateral Development Banks Bonds	1,314	-
Bank and corporate bonds	270	799
Derivatives	41	7
Total	**70,787**	**39,867**

Bonds exposure by rating grade	The Bank (Group)	
	31 December 2018	31 December 2017
High grade (AAA-A)	65,709	32,690
Standard grade (B-BBB+)	5,037	7,170
Not rated	-	-
Total	**70,746**	**39,860**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Credit risk (cont'd)

Risk concentration of the maximum exposure to credit risk

Tables below present the breakdown of trading and investment activities by geographical region:

	The Bank (The Group)							
	31 December 2018				31 December 2017			
Bonds exposure by geography	Government bonds	Bank bonds	Financial institution bonds	Non-financial institution bonds	Government bonds	Bank bonds	Financial institution bonds	Non-financial institution bonds
Lithuania	43,887	-	-	-	18,017	-	-	-
Iceland	1,567	-	-	-	1,600	-	-	-
Spain	1,002	-	-	-	1,869	-	-	-
Croatia	-	-	-	-	1,058	-	-	-
Latvia	4,575	-	-	-	1,003	-	-	-
Poland	3,005	-	-	-	2,127	-	-	-
Romania	3,089	-	-	-	2,075	-	-	-
Slovenia	4,172	-	-	-	2,565	-	-	-
Sweden	2,619	-	-	-	3,347	-	-	-
Hungary	1,679	-	-	-	1,368	-	-	-
Germany	-	-	-	878	-	-	-	421
Estonia	-	-	-	270	-	-	-	799
Finland	2,689	-	-	-	1,668	-	-	-
Belgium	-	-	-	-	1,943	-	-	-
Luxembourg	-	1,314	-	-	-	-	-	-
Total	**68,284**	**1,314**	**-**	**1,148**	**38,640**	**-**	**-**	**1,220**

The Group and the Bank have no impaired or overdue amounts within trading and investment activities.

For trading and investment activities, the Group and the Bank have assigned "AAA" to "A" (based on Fitch ratings or similar international rating agency equivalent) rating bonds to high grade, "BBB" to "B" rating bonds – to standard grade.

Corporate and bank bonds by sectors

The Bank (the Group)	**31 December 2018**	**31 December 2017**
Finance (Bank)	1,314	-
Energy	270	799
General public administration activities	878	421
Total	**2,462**	**1,220**

The Group manages, limits and controls concentration of credit risk – in particular, to individual counterparties and groups of the associated counterparties as well as to economic sectors.

In addition to the Bank of Lithuania requirements to limit exposures to a single borrower and large exposures, the Group also sets exposure requirement that the exposure of the borrowers may not exceed the established 15 percent internal limits. The maximum exposure requirement to a single borrower established by the Bank of Lithuania is 25 percent. Concentration of credit risk of the Bank is disclosed in Note 33, Credit risk.

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Credit risk (cont'd)

Risk concentration of the maximum exposure to credit risk (cont'd)

The Group also sets limits to industry segments, i.e. a possible concentration in certain industries at the Group's level is restricted by the internal lending limits. The percentage and volume of lending limits are set for individual industries to ensure that the Group is not overly exposed to any particular economic sector in the country.

Exposure by geographical area

The geographical concentration risk is not recognised in the Group's business since the principle of focusing on domestic customers is followed. The Bank's maximum credit exposure to one client or counterparty before impairment as at 31 December 2018 was EUR 5,841 thousand (EUR 4,835 thousand as at 31 December 2017), and after application of all credit risk mitigation measures as at 31 December 2018 was EUR 5,832 thousand (EUR 4,828 thousand as at 31 December 2017). The proportion to the Bank's capital was 22,75% (20,99% as at 31 December 2017).

The Bank, 2018	**Corporate loans**	**Individuals loans**	**Total**
Lithuania	195,354	22,846	**218,200**
United States of America	5	-	**5**
Germany	-	23	**23**
Austria	2,476	-	**2,476**
Russia	1,470	305	**1,775**
Belarus	-	91	**91**
Poland	26	-	**26**
France	-	176	**176**
United Kingdom	14	244	**258**
Croatia	450		**450**
Other	177	345	**522**
	199,972	**24,030**	**224 002**

The Group, 2018	**Corporate loans**	**Individuals loans**	**Total**
Lithuania	195,579	24,651	**220,230**
United States of America	5	-	**5**
Germany	-	24	**24**
Austria	2,476	-	**2,476**
Russia	1,470	305	**1,775**
Belarus	-	91	**91**
Poland	26	-	**26**
France	-	176	**176**
United Kingdom	14	244	**258**
Croatia	450		**450**
Other	219	344	**563**
Total	**200,239**	**25,835**	**226,074**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Credit risk (cont'd)

Risk concentration of the maximum exposure to credit risk (cont'd)

The Bank, 2017	Corporate loans	Individuals loans	Total
Lithuania	182,366	27,511	**209,877**
United States of America	9	-	**9**
Germany	-	25	**25**
Austria	2,270	-	**2,270**
Russia	135	420	**555**
Belarus	1	110	**111**
Poland	13	-	**13**
France	-	189	**189**
United Kingdom	7	260	**267**
Croatia	65	-	**65**
Other	67	301	**368**
Total	**184,933**	**28,816**	**213,749**

The Group, 2017	Corporate loans	Individuals loans	Total
Lithuania	182,433	27,670	**210,103**
United States of America	9	-	**9**
Germany	-	25	**25**
Austria	2,270	-	**2,270**
Russia	135	420	**555**
Belarus	1	110	**111**
Poland	13	-	**13**
France	-	189	**189**
United Kingdom	7	260	**267**
Croatia	65	-	**65**
Other	109	300	**409**
Total	**185,042**	**28,974**	**214 ,016**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Risk by sector

An industry sector split of the Bank's and the Group's financial assets before taking into account collateral held is as follows:

The Group			The Bank	
31 December 2018	**31 December 2017**		**31 December 2018**	**31 December 2017**
200,239	**185,041**	**Corporate loans**	**199,972**	**184,933**
21,688	19,651	*Trading enterprises*	*21,688*	19,651
21,974	24,632	*Real estate operations*	*21,974*	24,632
5,391	5,366	*Real estate constructions*	*5,391*	5,366
13,334	13,676	*Transport*	*13,334*	13,675
9,127	9,748	*Manufacturing*	*9,127*	9,748
42,167	30,948	*Services*	*41,941*	30,883
30,118	30,256	*Agriculture and food processing*	*30,118*	30,256
4,651	4,748	*Energy*	*4,651*	4,748
49,237	42,545	*Financial services*	*49,196*	42,503
2,552	3,471	*Local government*	*2,552*	3,471
25,835	**28,975**	**Individuals loans**	**24,030**	**28,816**
226,074	**214,016**	**Total**	**224,002**	**213,749**

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 ability to repay loan is the primary criterion in loan evaluation, though the Group and the Bank always demand collateral. Acceptable collaterals are classified into real estate, movable properties, guarantees, insurance, financial assets and other. Assets accepted as collateral are estimated at their fair value, while estimating present value of the loan taking into account the costs for obtaining and selling the collateral. When real estate is appraised, the Group and the Bank also take into account its liquidity and useful life.

According to the Bank's policy for evaluation of collaterals, different types of collaterals need to be revaluated in different timescale: residential buildings – at least every 5 years, commercial buildings – every 4 years, land – 3-5 years, vehicles – 1 years, other collaterals from 1 to 3 years. In addition to that there is also a requirement that in case of significant price correction in the real estate market or other significant change in economic environment, revaluation of all Bank's collateral should be performed.

The fair value of the rest collateral is appraised using both external and internal valuators.

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Collateral and other credit enhancements (cont'd)

The main types of collateral by fair value of collateral established on the last appraisal date are as follows:

	The Bank (The Group) 2018			The Bank (The Group) 2017		
	Corporate	Individuals	Totals	Corporate	Individuals	Totals
Real estate	333,613	76,995	**410,608**	240,821	82,834	**323,655**
Securities	4,850	-	**4,850**	1,763	-	**1,763**
Vehicles	41,510	653	**42,163**	37,338	545	**37,883**
Equipment	19,262	-	**19,262**	21,494	118	**21,612**
Cash	2,455	30	**2,485**	846	102	**948**
Credit insurance	1,118	651	**1,769**	1,273	838	**2,111**
Guarantees received	14,038	3	**14,041**	15,348	6	**15,354**
Other	92,392	4	**92,396**	25,362	45	**25,407**
Total	**509,238**	**78,336**	**587,574**	**344,245**	**84,488**	**428,733**

Pledged real estate value (related with NPL assets) is based on the valuation reports of licensed appraisers. New vehicles and equipment collateral value is based on acquisition value according to the acquisition document, used vehicles and equipment – based on the valuation reports of licensed appraisers (revaluation is performed every 3 years for not impaired loans and every 2 years for impaired loans). Guarantees are presented based on contractual terms. Cash is presented as the balance in the account on the reporting day. Securities are presented at their nominal value. Credit insurance value is based on the management‘s evaluation based on the documents from insurance companies. The value of other collaterals (goods, inventories) is based on the management's evaluation.

Credit quality per class of financial asset

The credit quality of financial assets is managed by the Bank and the Group using an internal credit assessment system as described below.

Impairment and provisioning policies

The Impairment Model (Expected Credit Loss Calculation Model) will be applied to financial assets at amortized cost or fair value, excluding equity investments. Depending on the credit risk change since the initial recognition, financial instruments are classified into 3 risk levels. For off-balance sheet items, expected credit losses are calculated in the same way as losses for the respective balance sheet exposures according to the risk level of the respective balance sheet position.

Lending positions, irrespective of whether special provisions are set for a homogeneous group or individually, are regrouped in order to respond consistently to credit risk factors as macroeconomic conditions change. After the breakdown of lending positions, the amounts of special provisions are recalculated accordingly.

Lending positions, after assessing their credit risk from initial recognition, are classified into one of three risk levels:
Risk level 1 includes those exposures that have not significantly increased credit risk, i.e. no credit risk indicator or loss event has been recorded after the initial loan recognition.
Risk level 2 includes exposures with a credit risk indicator or significant credit risk increase.
Risk level 3 includes non-performing loans and other exposures that are expected to be defaulted (loss event).

Special provisions for a borrowing position shall be calculated collectively or individually in accordance with the following provisions:
Lending exposures assigned to risk level 1 (low credit risk) are collectively assessed and special provisions are valued at the amount of 12 months' ECL (expected credit loss) duration.
For risk level 2 (significant increase in credit risk), assigned credit exposures are valued collectively, except for customers with a bank lending position of more than EUR 500,000 or overdue payments from 60 to 90 calendar days. Lending positions are valued individually. For collectively assessed lending exposures, the amount of special provisions is calculated on the basis of an unlimited duration of ECL.
Lending positions assigned to level 3 (credit default) are assessed individually.

Note 33 Risk management (cont'd)

Credit risk (cont'd)

Other asset groups include lending positions that do not meet the criteria for other homogeneous groups.
Lending positions with the Central Bank are not assessed because they assume that their credit risk is very low and does not significantly increase from initial recognition.

Collectively rated lending exposures are assessed by the ECL using a model developed by the Bank that calculates internal risk parameters for each homogeneous group according to the applicable scenario. The Procedure for Recognition of Impairment of Financial Instruments is described in the Expected Credit Risk Loss Assessment Rules.

The carrying amount of the loans is reduced through the use of an allowance account and the amount of the impairment loss is included in the income statement. For all financial instruments, after initial recognition, the borrowing position is reviewed, and at least once a year a comprehensive assessment of the change in the client's risk profile is performed to determine the materiality of the credit risk. Each month, an assessment is made of indicators that reduce (increase) the credit risk of the borrowing position, by which the previously recognized impairment loss is reversed or increased by adjusting the allowance account. Impairment losses relate to the original application of IFRS 9 and are accounted for directly through equity.

Lending positions, irrespective of whether special provisions are set for a homogeneous group or individually, are regrouped in order to respond consistently to credit risk factors as macroeconomic conditions change. After the breakdown of lending positions, the amounts of special provisions are recalculated accordingly.

Credit quality by financial asset classes

The credit quality of a financial asset in the Bank or the Group is managed using an internal credit risk assessment system as described below.

Risk management

When assessing financial instruments, the Group and the Bank apply specific criteria and procedures for the assessment of debtors. Due to the change in credit risk since initial recognition loans are divided into three stages:

- Stage 1 – all performing loans, unless there has been a significant increase in credit risk since the initial recognition, and it's expected that the borrower has strong capacity to meet contractual future cash flows.
- Stage 2 – loans when there has been a significant increase in credit risk since initial recognition.
- Stage 3 – all defaulted loans with recognised loss events and POCI (purchased or originated credit-impaired) assets

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Credit risk (cont'd)

Credit risk assessment of financial instruments other than trading and off-balance sheet items

The Bank 31 December 2018	**Not overdue**	**1 to 59 days**	**60 to 89 days**	**More than 90 days**	**Total**
Stage 1					
Loans and receivables	150,689	2,623	-	-	**153,312**
Placements with LB and other banks	43,309	-	-	-	**43,309**
Debt securities	70,746	-	-	-	**70,746**
Other financial assets	55	-	-	-	**55**
Total	**264,799**	**2,623**	**-**	**-**	**267,422**
Stage 2					
Loans and receivables	9,664	409	354	-	**10,427**
Placements with LB and other banks	-	-	-	-	-
Debt securities	-	-	-	-	-
Other financial assets	-	-	-	-	**-**
Total	**9,664**	**409**	**354**	**-**	**10,427**
Stage 3					
Loans and receivables	1,306	1,849	388	2,513	**6,056**
Placements with LB and other banks	-	-	-	-	-
Debt securities	-	-	-	-	-
Other financial assets	-	-	-	-	**-**
Total	**1,306**	**1,849**	**388**	**2,513**	**6,056**
Total	**275,769**	**4,881**	**742**	**2,513**	**283,905**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Credit risk (cont'd)

The Bank 1 January 2018	Not overdue	1 to 59 days	60 to 89 days	More than 90 days	Total
Stage 1					
Loans and receivables	140,312	2,622	-	-	**142,934**
Placements with LB and other banks	40,538	-	-	-	**40,538**
Debt securities	39,860	-	-	-	**39,860**
Other financial assets	170	-	-	-	**170**
Total	**220,880**	**2,622**	**-**	**-**	**223,502**
Stage 2					
Loans and receivables	4,887	921	99	-	**5,907**
Placements with LB and other banks	-	-	-	-	-
Debt securities	-	-	-	-	-
Other financial assets	-	-	-	-	**-**
Total	**4,887**	**921**	**99**	**-**	**5,907**
Stage 3					
Loans and receivables	1,443	3,843	464	8,863	**14,613**
Placements with LB and other banks	-	-	-	-	-
Debt securities	-	-	-	-	-
Other financial assets	-	-	-	-	**-**
Total	**1,443**	**3,843**	**464**	**8,863**	**14,613**
Total	**227,210**	**7,386**	**563**	**8,863**	**244,022**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Credit risk (cont'd)

The Group 31 December 2018	Not overdue	1 to 59 days	60 to 89 days	More than 90 days	Total
Stage 1					
Loans and receivables	152,364	2,903	-	-	**155,267**
Placements with LB and other banks	43,350	-	-	-	**43,350**
Debt securities	70,746	-	-	-	**70,746**
Other financial assets	55	-	-	-	**55**
Total	**266,515**	**2,903**	**-**	**-**	**269,418**
Stage 2					
Loans and receivables	9,672	432	357	-	**10,461**
Placements with LB and other banks	-	-	-	-	-
Debt securities	-	-	-	-	-
Other financial assets	-	-	-	-	**-**
Total	**9,672**	**432**	**357**	**-**	**10,461**
Stage 3					
Loans and receivables	1,306	1,852	394	2,546	**6,098**
Placements with LB and other banks	-	-	-	-	-
Debt securities	-	-	-	-	-
Other financial assets	-	-	-	-	**-**
Total	**1,306**	**1,852**	**394**	**2,546**	**6,098**
Total	**277,493**	**5,187**	**751**	**2,546**	**285,977**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Credit risk (cont'd)

The Group 1 January 2018	Not overdue	1 to 59 days	60 to 89 days	More than 90 days	Total
Stage 1					
Loans and receivables	140,455	2,643	-	-	**143,098**
Placements with LB and other banks	40,581	-	-	-	**40,581**
Debt securities	39,860	-	-	-	**39,860**
Other financial assets	170	-	-	-	**170**
Total	**221,066**	**2,643**	**-**	**-**	**223,709**
Stage 2					
Loans and receivables	4,887	932	105	-	**5,924**
Placements with LB and other banks	-	-	-	-	-
Debt securities	-	-	-	-	-
Other financial assets	-	-	-	-	**-**
Total	**4,887**	**932**	**105**	**-**	**5,924**
Stage 3					
Loans and receivables	1,443	3,843	464	8,906	**14,656**
Placements with LB and other banks	-	-	-	-	-
Debt securities	-	-	-	-	-
Other financial assets	-	-	-	-	**-**
Total	**1,443**	**3,843**	**464**	**8,906**	**14,656**
Total	**227,396**	**7,418**	**569**	**8,906**	**244,289**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Special provisions calculated by risk levels

The Bank	1 January 2018					31 December 2018				
	Collectively evaluated assets	Individually evaluated assets	Credit commitments	Guarantees	Total	Collectively evaluated assets	Individually evaluated assets	Credit commitments	Guarantees	Total
Stage 1	**422**		**24**	**2**	**448**	**441**		**26**	**4**	**471**
Loans and receivables	378	-	24	2	**404**	385	-	26	4	**415**
Placements with LB and other banks	20	-	-	-	**20**	13	-			**13**
Debt securities	24	-	-	-	**24**	43	-	-	-	**43**
Other financial assets	-	-	-	-	-	-	-	-	-	-
Stage 2	**36**	**-**	**-**	**-**	**36**	**78**	**-**	**-**	**-**	**78**
Loans and receivables	36	-	-	-	**36**	78	-	-	-	**78**
Stage 3	**-**	**5,562**	**-**	**-**	**5,562**	**-**	**2,083**	**-**	**-**	**2,083**
Loans and receivables	-	5,562	-	-	**5,562**	-	2,083	-	-	**2,083**
Total	**458**	**5,562**	**24**	**2**	**6,046**	**519**	**2,083**	**26**	**4**	**2,632**

The Group	1 January 2018					31 December 2018				
	Collectively evaluated assets	Individually evaluated assets	Credit commitments	Guarantees	Total	Collectively evaluated assets	Individually evaluated assets	Credit commitments	Guarantees	Total
Stage 1	**425**	**-**	**24**	**2**	**451**	**459**	**-**	**26**	**4**	**489**
Loans and receivables	381	-	24	2	**407**	403	-	26	4	**433**
Placements with LB and other banks	20	-	-	-	**20**	13	-	-	-	**13**
Debt securities	24	-	-	-	**24**	43	-	-	-	**43**
Other financial assets	0	-	-	-	**0**	0	-	-	-	**0**
							-	-	-	-
Stage 2	**34**	**2**	**-**	**-**	**36**	**79**	**-**	**-**	**-**	**79**
Loans and receivables	34	2	-	-	**36**	79	-	-	-	**79**
Stage 3	**-**	**5,607**	**-**	**-**	**5,607**	**-**	**2,118**	**-**	**-**	**2,118**
Loans and receivables	-	5,607	-	-	**5,607**	-	2,118	-	-	**2,118**
Total	**459**	**5,609**	**24**	**2**	**6,094**	**538**	**2,118**	**26**	**4**	**2,686**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

2018 December 31 Impairment for loans and receivables according to risk levels also includes impairment for off-balance sheet items which as at 1 January amounted to EUR 26 thousand, as at 31 December 2018 – EUR 30 thousand.

Changes of special provisions during year 2018

The Group						The Bank				
Collectively evaluated assets	Individually evaluated assets	Credit commitments	Guarantees	Total	The Bank 31 December 2018	Collectively evaluated assets	Individually evaluated assets	Credit commitments	Guarantees	Total
34		**2**	**2**	**38**	**Stage 1**	**19**		**2**	**2**	**23**
22	-	2	2	**26**	Loans and receivables	7	-	2	2	**11**
(7)	-	-	-	**(7)**	Placements with LB and other banks	(7)	-	-	-	**(7)**
19	-	-	-	**19**	Debt securities	19	-	-	-	**19**
-	-	-	-	-	Other financial assets	-	-	-	-	-
45	**(2)**	**-**	**-**	**43**	**Stage 2**	**42**	**-**	**-**	**-**	**42**
45	(2)	-	-	**43**	Loans and receivables	**42**	-	-	-	**42**
-	**(3,490)**	**-**	**-**	**(3,490)**	**Stage 3**	**-**	**(3,479)**	**-**	**-**	**(3,479)**
-	(3,490)	-	-	**(3,490)**	Loans and receivables	-	(3,479)	-	-	(3,479)
79	**(3,491)**	**2**	**2**	**(3,40)**	**Total**	**61**	**(3,479)**	**2**	**2**	**(3,414)**
-	-	-	-	**4,837**	Write-offs	-	-	-	-	**4,837**
-	-	-	-	**(115)**	Received loans that have been written off during the period	-	-	-	-	**(115)**
-	-	-	-	**1,313**	**Total changes in provisions**	-	-	-	-	**1,308**

The data between 31 December 2018 and 2017 is not comparable as the calculations were made applying different financial reporting standards: as at 31 December 2018 IFRS 9 was applied, as at 31 December 2017 – IAS 39.

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Liquidity risk

Liquidity risk refers to the availability of sufficient funds to meet deposit withdrawals and other financial commitments associated with financial instruments as they actually fall due. In order to manage liquidity risk, the Group and the Bank perform daily monitoring of future expected cash flows on clients' and banking operations, which is a part of assets/liabilities management process. The Board of Directors 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 major part of term deposits in the Bank's and the Group's deposit portfolio are placed for 6 to 13 month period, and average monthly fluctuations of this portfolio not exceeding more than 5 percent according to historical data. Several year statistics of the Group and the Bank show that activities of the Group and the Bank ensure stable level of those funds, also most of such funds are extended after maturity; this allows investing them into longer term financial assets.

From the beginning of 2015, the mandatory requirements of compliance with liquidity coverage ratio came into force according to Regulation (EU) No 575/2013 of the European Parliament and of the Council. The liquidity coverage ratio (LCR) refers to highly liquid assets held by the Bank or the Group in order to meet short-term obligations. The Bank or the Group is required to hold an amount of highly-liquid assets, such as cash treasury bonds and other liquid financial instruments, equal to or greater than net cash outflow over a 30-day period, i.e. liquidity coverage ratio cannot be lower than 100 percent. The liquidity coverage ratio of the Bank was started to be measured from the beginning of 2014, but it wasn't a compulsory requirement. Liquidity coverage ratios of the Bank and the Group are as follows:

Note 33 Risk management (cont'd)

Liquidity risk (cont'd)

The Group			**The Bank**	
31 December 2018	**31 December 2017**		**31 December 2018**	**31 December 2017**
128,502	90,760	Liquid assets	128,502	90,760
13,564	12,423	Short-term (up to 30 days) obligations	13,791	12,575
947	**731**	**LCR (%)**	**932**	**722**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Liquidity risk (cont'd)

The following tables provide an analysis of carrying amounts of all assets and all liabilities grouped on the basis of the remaining period from the date of the statement of financial position to the contractual maturity date:

The Bank

	31 December 2018							
	On demand	**Less than 1 month**	**1 to 3 months**	**3 months to 1 year**	**1 to 3 years**	**Over 3 years**	**Without maturity**	**Total**
Assets:								
Cash and due from banks	69,432	-	-	-	-	-	1,181	**70,613**
Investments in debt securities	-	2,338	22,039	19,080	21,954	5,335	-	**70,746**
Investments in subsidiaries	-	-	-	-	-	-	7,521	**7,521**
Loans to customers	-	3,191	5,028	27,369	55,150	63,097	1,669	**155,504**
Receivables with deferred payment	-	-	-	-	-	-	-	**-**
Loans to bank and financial institutions		469	-	1,013	-	-	-	**1,482**
Receivables from leasing	-	317	590	2,730	5,206	3,920	46	**12,809**
Other assets	-	44	-	-	-	-	9,411	**9,455**
Total	**69,432**	**6,359**	**27,657**	**50,192**	**82,310**	**72,352**	**19,828**	**328,130**
Liabilities:								
Due to banks and other credit institutions	228	-	-	-	-	-	-	**228**
Due to customers	111,361	13,489	18,208	78,552	44,790	24,330	3	**290,733**
Debt securities issued	-	-	-	-	-	2,167	-	**2,167**
Subordinated loans	-	-	-	-	-	1,000	-	**1,000**
Other liabilities	201	3,163	5	10	8	11	-	**3,398**
Total	**111,790**	**16,652**	**18,213**	**78,562**	**44,798**	**27,508**	**3**	**297,526**
Net position	**(42,358)**	**(10,293)**	**9,444**	**(28,370)**	**37,512**	**44,844**	**(19,825)**	**30,604**
Accumulated gap	***(42,358)***	***(52,651)***	***(43,207)***	***(71,577)***	***(34,065)***	***10,779***	***30,604***	**-**
Loan commitments		8,876						**8,876**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Liquidity risk (cont'd)

The Bank

	31 December 2017							
	On demand	**Less than 1 month**	**1 to 3 months**	**3 months to 1 year**	**1 to 3 years**	**Over 3 years**	**Without maturity**	**Total**
Assets:								
Cash and due from banks	60,406	3,335	-	66	-	-	1,209	**65,016**
Investments in debt securities	-	3,575	11,420	7,575	10,343	6,947	-	**39,860**
Investments in subsidiaries	-	-	-	-	-	-	6,439	**6,439**
Loans to customers	-	3,943	5,246	25,987	46,105	59,748	6,094	**147,123**
Receivables with deferred payment	-	4	-	-	2,653	-	-	**2,657**
Loans to bank and financial institutions	-	249	7	1,579	-	-	-	**1,835**
Receivables from leasing	-	275	542	2,286	4,600	3,942	194	**11,839**
Other assets	-	1,725	-	-	-	-	9,674	**11,399**
Total	**60,406**	**13,106**	**17,215**	**37,493**	**63,701**	**70,637**	**23,610**	**286,168**
Liabilities:								
Due to banks and other credit institutions	600	-	-	-	3,000	-	-	**3,600**
Due to customers	78,091	16,958	23,637	92,793	25,218	16,220	3	**252,920**
Debt securities issued	-	-	-	-	-	-	-	**-**
Subordinated loans	-	-	-	-	-	1,000	-	**1,000**
Other liabilities	19	1,146	2	7	5	4	-	**1,183**
Total	**78,710**	**18,104**	**23,639**	**92,800**	**28,223**	**17,224**	**3**	**258,703**
Net position	**(18,304)**	**(4,998)**	**(6,424)**	**(55,307)**	**35,478**	**53,413**	**23,607**	**27,465**
Accumulated gap	***(18,304)***	***(23,302)***	***(29,726)***	***(85,033)***	***(49,555)***	***3,858***	***27,465***	
Loan commitments	**-**	8,994	-	-	-	-	-	**8,994**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Liquidity risk (cont'd)

The Group	31 December 2018							
	On demand	Less than 1 month	1 to 3 months	3 months to 1 year	1 to 3 years	Over 3 years	Without maturity	Total
Assets:								
Cash and due from banks	69,473	-	-	-	-	-	1,181	**70,654**
Investments in debt securities	-	2,338	22,039	19,080	21,954	5,335	-	**70,746**
Loans to customers	-	3,245	5,119	27,739	55,869	63,632	1,705	**157,309**
Receivables with deferred payment	-	-	13	40	107	53	13	**226**
Loans to bank and financial institutions	-	469	-	1,013	-	-	-	**1,482**
Receivables from leasing	-	317	590	2,730	5,206	3,920	46	**12,809**
Other assets	-	44	-	-	-	-	11,493	**11,537**
Total	**69,473**	**6,413**	**27,761**	**50,602**	**83,136**	**72,940**	**14,438**	**324,763**
Liabilities:								
Due to banks and other credit institutions	228	-	-	-	-	-	-	**228**
Due to customers	109,754	13,489	18,208	78,552	44,790	24,330	3	**289,126**
Debt securities issued	-	-	-	-	-	2,167	-	**2,167**
Subordinated loans	-	-	-	-	-	1,000	-	**1,000**
Other liabilities	201	1,477	5	10	8	11	-	**1,712**
Total	**110,183**	**14,966**	**18,213**	**78,562**	**44,798**	**27,508**	**3**	**294,233**
Net position	**(40,710)**	**(8,553)**	**9,548**	**(27,960)**	**38,338**	**45,432**	**14,435**	**30,530**
Accumulated gap	***(40,710)***	***(49,263)***	***(39,715)***	***(67,675)***	***(29,337)***	***16,095***	***30,530***	
Loan commitments		8,876						**8,876**

The Group	31 December 2017							
	On demand	Less than 1 month	1 to 3 months	3 months to 1 year	1 to 3 years	Over 3 years	Without maturity	Total
Assets:								
Cash and due from banks	60,449	3,335	-	66	-	-	1,209	**65,059**
Investments in debt securities	-	3,575	11,420	7,575	10,343	6,947	-	**39,860**
Loans to customers	-	3,959	5,263	26,031	46,137	59,748	6,142	**147,280**
Receivables with deferred payment	-	4	13	40	2,760	106	-	**2,923**
Loans to bank and financial institutions	-	249	7	1,380	-	-	-	**1,636**
Receivables from leasing	-	275	542	2,286	4,600	3,942	194	**11,839**
Other assets	-	2,045	-	-	-	-	14,543	**16,588**
Total	**60,449**	**13,442**	**17,245**	**37,378**	**63,840**	**70,743**	**22,088**	**285,185**
Liabilities:								
Due to banks and other credit institutions	600	-	-	-	3,000	-	-	**3,600**
Due to customers	77,026	16,958	23,637	92,793	25,218	16,220	3	**251,855**
Debt securities issued	-	-	-	-	-	-	-	**-**
Subordinated loans	-	-	-	-	-	1,000	-	**1,000**
Other liabilities	19	1,252	2	7	5	4	-	**1,289**
Total	**77,645**	**18,210**	**23,639**	**92,800**	**28,223**	**17,224**	**3**	**257,744**
Net position	**(17,196)**	**(4,768)**	**(6,394)**	**(55,422)**	**35,617**	**53,519**	**22,085**	**27,441**
Accumulated gap	**(17,196)**	**(21,964)**	**(28,358)**	**(83,780)**	**(48,163)**	**5,356**	**27,441**	
Loan commitments	**-**	8,994	-	-	-	-	-	**8,994**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Liquidity risk (cont'd)

Overdue loans in 2018 December 31 and 2017 December 31 is revealed in the column 'Without maturity'.

The following tables provide an analysis of financial liabilities based on contractual undiscounted repayment obligations:

The Bank

	31 December 2018							
	On demand	**Less than 1 month**	**1 to 3 months**	**3 months to 1 year**	**1 to 3 years**	**Over 3 years**	**Without maturity**	**Total**
Liabilities:								
Due to banks and other credit institutions	228	-	-	-		-	-	**228**
Due to customers	111,362	13,555	18,283	79,153	45,998	25,636	3	**293,990**
Debt securities issued	-	-	-	-	-	1,000	-	**1,000**
Subordinated loans	0	0	0	0	0	3,229	0	**3,229**
Other liabilities	201	3,135	5	10	8	9	-	**3,368**
Guarantees	2,026	-	-	-	-	-	-	**2,026**
Credit commitments	8,902	-	-	-	-	-	-	**8,902**
Total undiscounted financial liabilities	**122,719**	**16,690**	**18,288**	**79,163**	**46,006**	**29,874**	**3**	**312,743**

The Bank

	31 December 2017							
	On demand	**Less than 1 month**	**1 to 3 months**	**3 months to 1 year**	**1 to 3 years**	**Over 3 years**	**Without maturity**	**Total**
Liabilities:								
Due to banks and other credit institutions	600	-	-	-	3,000	-		**3,600**
Due to customers	78,088	17,061	23,804	93,546	25,953	17,095	4	**255,551**
Debt securities issued	-	-	-	-	-	-	-	**-**
Subordinated loans	-	-	-	-	-	1,000	-	**1,000**
Other liabilities	19	1,146	2	7	5	4	-	**1,183**
Guarantees	763	-	-	-	-	-	-	**763**
Credit commitments	8,994	-	-	-	-	-	-	**8,994**
Total undiscounted financial liabilities	**88,464**	**18,207**	**23,806**	**93,553**	**28,958**	**18,099**	**4**	**271,091**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Liquidity risk (cont'd)

The Group

	31 December 2017							
	On demand	**Less than 1 month**	**1 to 3 months**	**3 months to 1 year**	**1 to 3 years**	**Over 3 years**	**Without maturity**	**Total**
Liabilities:								
Due to banks and other credit institutions	228	-	-	-		-	-	**228**
Due to customers	109,755	13,555	18,283	79,153	45,998	25,636	3	**292,383**
Debt securities issued	-	-	-	-	-	1,000	-	**1,000**
Subordinated loans	0	0	0	0	0	3,229	0	**3,229**
Other liabilities	201	1,449	5	10	8	9	-	**1,682**
Guarantees	2,026	-	-	-	-	-	-	**2,026**
Credit commitments	8,902	-	-	-	-	-	-	**8,902**
Total undiscounted financial liabilities	**121,112**	**15,004**	**18,288**	**79,163**	**46,006**	**29,874**	**3**	**309,450**

The Group

	31 December 2016							
	On demand	**Less than 1 month**	**1 to 3 months**	**3 months to 1 year**	**1 to 3 years**	**Over 3 years**	**Without maturity**	**Total**
Liabilities:								
Due to banks and other credit institutions	600	-	-	-	3,000	-	-	**3,600**
Due to customers	77,023	17,061	23,804	93,546	25,953	17,095	4	**254,486**
Debt securities issued	-	-	-	-	-	-	-	**-**
Subordinated loans	-	-	-	-	-	1,000	-	**1,000**
Other liabilities	19	1,252	2	7	5	4	-	**1,289**
Guarantees	763	-	-	-	-	-	-	**763**
Credit commitments	8,994	-	-	-	-	-	-	**8,994**
Total undiscounted financial liabilities	**87,399**	**18,313**	**23,806**	**93,553**	**28,958**	**18,099**	**4**	**270,132**

The Group and the Bank do not expect to pay under any of the guarantees, though they were included in the range on demand assuming worst case scenario. In case of failure of clients to fulfil the obligations where the Group and the Bank have issued guarantees, guarantees would become payable on demand.

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

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 exchange rates and equity prices. The market risk is managed and controlled by continuous market monitoring and analysis of forecasted market changes.

The Bank and the Group by managing loans in foreclosure processes and holding as investment property repossessed assets face real estate market price risk. Real estate market price risk is the risk to incur losses due to low market liquidity that disables to sell assets at the desired time for a desired price or a possibility to sell available assets (investments) is lost.

The Bank		**Effect for profit and loss**	
	Changes in presumptions	**31 December 2018**	**31 December 2017**
Land	+ 10%	50	443
Commercial property	+ 10%	328	596
Residential property	+ 10%	121	540
Other assets	+ 10%	58	143
Total		**557**	**1,722**
Land	- 10%	(50)	(443)
Commercial property	- 10%	(328)	(596)
Residential property	- 10%	(121)	(540)
Other assets	- 10%	(58)	(143)
Total		**(557)**	**(1,722)**

The Group		**Effect for profit and loss**	
	Changes in presumptions	**31 December 2018**	**31 December 2017**
Land	+ 10%	209	742
Commercial property	+ 10%	357	697
Residential property	+ 10%	130	602
Other assets	+ 10%	58	165
Total		**754**	**2,206**
Land	- 10%	(209)	(742)
Commercial property	- 10%	(357)	(697)
Residential property	- 10%	(130)	(602)
Other assets	- 10%	(58)	(165)
Total		**(754)**	**(2,206)**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

<u>Interest rate risk</u>

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 Board has established internal limits, monitors compliance with the required limits are monitored on a monthly basis. Interest rate risk is managed by forecasting the market interest rates and managing the mismatches between assets and liabilities from re-pricing maturities. The Group and the Bank apply the interest rate risk management methods allowing to measure the Bank's and the Group's sensitivity to interest rate changes by computing the impact to yearly net interest income in case of parallel shift by 1 percentage point in the yield curve.

The following table demonstrates the sensitivity to change in interest rates, with all other variables held constant, on the Bank's and the Group's pre-tax income (which equals the effect on net interest income):

The Bank		**Effect on net interest income**	
	Interest rate change	**31 December 2018**	**31 December 2017**
EUR	+ 1 %	890	502
USD	+ 1 %	64	77
Other	+ 1 %	(4)	5
EUR	- 1 %	(890)	(502)
USD	- 1 %	(64)	(77)
Other	- 1 %	4	(5)

The Group		**Effect on net interest income**	
	Interest rate change	**31 December 2018**	**31 December 2017**
EUR	+ 1 %	896	502
USD	+ 1 %	64	77
Other	+ 1 %	(4)	5
EUR	- 1 %	(896)	(502)
USD	- 1 %	(64)	(77)
Other	- 1 %	4	(5)

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Interest rate risk (cont'd)

The table below summarises the Group's and the Bank's exposure to interest rate risk as at 31 December 2017 and 2016. The table below includes the Group's and the Bank's assets and liabilities at carrying amounts, classified by the earlier of contractual re-pricing or maturity dates.

	31 December 2018						
The Bank	**Less than 1 month**	**1 to 3 months**	**3 to 6 months**	**6 months to 1 year**	**1 to 3 years**	**Over 3 years**	**Total**
Assets:							
Cash and due from banks	-	-	-	-	-	-	**-**
Loans and receivables	34,538	50,457	67,920	13,403	4,913	4,593	**175,824**
Investments in debt securities	2,250	21,818	8,052	10,776	21,955	5,333	**70,184**
Other assets	189	-	-	-	-	-	**189**
Sensitive assets to interest rate fluctuation	**36,977**	**72,275**	**75,972**	**24,179**	**26,868**	**9,926**	**246,197**
Non-sensitive assets to interest rate fluctuation							**81,933**
Liabilities:							
Due to banks and other credit institutions	-	-	-	-	-	-	-
Due to customers	12,084	16,681	24,716	53,325	43,830	13,101	**163,737**
Debt securities issued	-	-	-	-	-	2,210	2,210
Other liabilities	-	-	-	-	626	12,473	**13,099**
Sensitive liabilities to interest rate fluctuation	**12,084**	**16,681**	**24,716**	**53,325**	**44,456**	**27,784**	**179,046**
Non-sensitive liabilities and equity to interest rate fluctuation							**149,084**
Total interest sensitivity gap	**24,893**	**55,594**	**51,256**	**(29,146)**	**(17,588)**	**(17,858)**	**-**

	31 December 2017						
The Bank	**Less than 1 month**	**1 to 3 months**	**3 to 6 months**	**6 months to 1 year**	**1 to 3 years**	**Over 3 years**	**Total**
Assets:							
Cash and due from banks	3,335	-	-	-	-	-	**3,335**
Loans and receivables	32,615	38,300	63,652	18,255	5,063	6,472	**164,357**
Investments in debt securities	3,575	11,420	5,796	1,773	10,343	6,947	**39,854**
Other assets	203	20	30	30			**283**
Sensitive assets to interest rate fluctuation	**39,728**	**49,740**	**69,478**	**20,058**	**15,406**	**13,419**	**207,829**
Non-sensitive assets to interest rate fluctuation							**78,339**
Liabilities:							
Due to banks and other credit institutions	-	-	-	-	-	-	-
Due to customers	16,207	23,038	30,194	61,540	23,282	8,291	**162,552**
Debt securities issued	-	-	-	-	-	-	-
Other liabilities	1,723					8,800	**10,523**
Sensitive liabilities to interest rate fluctuation	**17,930**	**23,038**	**30,194**	**61,540**	**23,282**	**17,091**	**173,075**
Non-sensitive liabilities and equity to interest rate fluctuation							**113,093**
Total interest sensitivity gap	**21,798**	**26,702**	**39,284**	**(41,482)**	**(7,876)**	**(3,672)**	**-**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Interest rate risk (cont'd)

	31 December 2018						
The Group	**Less than 1 month**	**1 to 3 months**	**3 to 6 months**	**6 months to 1 year**	**1 to 3 years**	**Over 3 years**	**Total**
Assets:							
Cash and due from banks	-	-	-	-	-	-	**-**
Loans and receivables	34,592	50,561	68,330	14,229	5,501	4,642	**177,855**
Investments in debt securities	2,250	21,818	8,052	10,776	21,955	5,333	**70,184**
Other assets	189	-	-	-	-	-	**189**
Sensitive assets to interest rate fluctuation	**37,031**	**72,379**	**76,382**	**25,005**	**27,456**	**9,975**	**248,228**
Non-sensitive assets to interest rate fluctuation							**76,535**
Liabilities:							
Due to banks and other credit institutions	-	-	-	-	-	-	-
Due to customers	12,084	16,681	24,716	53,325	43,830	13,101	**163,737**
Debt securities issued	-	-	-	-	-	2,210	2,210
Other liabilities	-	-	-	-	626	12,473	**13,099**
Sensitive liabilities to interest rate fluctuation	**12,084**	**16,681**	**24,716**	**53,325**	**44,456**	**27,784**	**179,046**
Non-sensitive liabilities and equity to interest rate fluctuation							**145,717**
Total interest sensitivity gap	**24,947**	**55,698**	**51,666**	**(28,320)**	**(17,000)**	**(17,809)**	**-**

	31 December 2017						
The Group	**Less than 1 month**	**1 to 3 months**	**3 to 6 months**	**6 months to 1 year**	**1 to 3 years**	**Over 3 years**	**Total**
Assets:							
Cash and due from banks	3,335	-	-	-	-	-	**3,335**
Loans and receivables	32,627	38,328	63,681	18,120	5,199	6,578	**164,533**
Investments in debt securities	3,575	11,420	5,796	1,773	10,343	6,947	**39,854**
Other assets	203	20	30	30			**283**
Sensitive assets to interest rate fluctuation	**39,740**	**49,768**	**69,507**	**19,923**	**15,542**	**13,525**	**208,005**
Non-sensitive assets to interest rate fluctuation							**77,180**
Liabilities:							
Due to banks and other credit institutions							
Due to customers	16,207	23,038	30,194	61,540	23,282	8,291	**162,552**
Debt securities issued	-	-	-	-	-	-	-
Other liabilities	1,723					8,800	**10,523**
Sensitive liabilities to interest rate fluctuation	**17,930**	**23,038**	**30,194**	**61,540**	**23,282**	**17,091**	**173,075**
Non-sensitive liabilities and equity to interest rate fluctuation							**112,110**
Total interest sensitivity gap	**21,810**	**26,730**	**39,313**	**(41,617)**	**(7,740)**	**(3,566)**	**-**

The Bank and the Group is exposed to the price risk, which arises from investments measured as fair value though profit and loss (FVTPL). The management of the Group monitors the proportions of debt securities in its investment portfolio based on market indices.

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Currency risk

The currency risk is managed by monitoring the risk exposure against the limits established for single open currency position. Positions are monitored on a daily basis. Our policy is to keep foreign exchange positions more or less closed.

The Group and the Bank are exposed to effects of fluctuation in the prevailing foreign currency exchange rates on its financial position and cash flows. The Board of Directors sets limits on the level of exposure by currencies, by branches, by subsidiaries and in total. These limits also comply with the minimum requirements of the Bank of Lithuania. The Bank's and the Group's exposure to foreign currency exchange rate risk is as follows:

The Bank	**Statement of financial position**		**Off Balance sheet**			
31 December 2018	Assets	Equity and liabilities	Contingent claims	Contingent liabilities	Open position	Position as % of capital
EUR	290,889	300,864	10,304	312	17	0.06 %
USD	23,611	24,029	297	-	(121)	(0.47) %
Other currencies	13,630	3,237	311	10,565	140	0.55 %
Total assets	**328,130**	**328,130**	**10,912**	**10,877**		
Long positions						534
Short positions						(515)
Eligible capital						25,639
Open foreign currency position 2018						**2.08 %**

The Bank	**Statement of financial position**		**Off Balance sheet**			
31 December 2017	Assets	Equity and liabilities	Contingent claims	Contingent liabilities	Open position	Position as % of capital
EUR	253,510	263,234	9,840	202	(86)	(0.40) %
USD	19,963	19,622	-	417	(76)	(0.35) %
Other currencies	12,695	3,312	201	9,448	136	0.63 %
Total assets	**286,168**	**286,168**	**10,041**	**10,067**		
Long positions						320
Short positions						(260)
Eligible capital						21,426
Open foreign currency position 2017						**1.50 %**

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Currency risk (cont'd)

The Group	**Statement of financial position**		**Off Balance sheet**			
31 December 2018	Assets	Equity and liabilities	Contingent claims	Contingent liabilities	Open position	Position as % of capital
EUR	287,522	297,497	10,304	312	17	0.06 %
USD	23,611	24,029	297	-	(121)	(0.47) %
Other currencies	13,630	3,237	311	10,565	140	0.54 %
Total assets	**324,763**	**324,763**	**10,912**	**10,877**		
Long positions						534
Short positions						(515)
Eligible capital						25 773
Open foreign currency position 2018						**2.07 %**

The Group	**Statement of financial position**		**Off Balance sheet**			
31 December 2017	Assets	Equity and liabilities	Contingent claims	Contingent liabilities	Open position	Position as % of capital
EUR	252,527	262,251	9,840	202	(86)	(0.39)%
USD	19,963	19,622	-	417	(76)	(0.35)%
Other currencies	12,695	3,312	201	9,448	136	0.62%
Total assets	**285,185**	**285,185**	**10,041**	**10,067**		
Long positions						320
Short positions						(260)
Eligible capital						21,907
Open foreign currency position 2017						**1.46%**

The pre-tax impact of changes in currency rates, calculated on linear basis, is presented below:

	2018	**2017**
Increase in FX rates by 10%	2	6
Decrease in FX rates by 10%	(2)	(6)

(All amounts in EUR thousand unless otherwise stated)

Note 33 Risk management (cont'd)

Anti-money laundering risk management

Anti-money laundering risk management

UAB Medicinos Bankas is implementing money laundering and terrorist financing prevention policy according to the legislation of the Republic of Lithuania and international legislation.

The Bank's money laundering and terrorist financing prevention policy's aims, its implementation procedures and instruments are regulated in the special Bank's documents.

Main procedures of money laundering and terrorist financing prevention:
- Know Your Customer procedures;
- customer identification;
- monitoring of the financial transactions performed by customers;
- identification of suspicious transactions and termination hereof (special systems introduced at the Bank enable to efficiently implement the procedure);
- keeping of information about transactions performed by customers and register handling;
- providing timely information to the Bank staff and training;
- internal control.

The Bank is following strict ethical and moral norms and is working with those clients whose funds and assets are reasonable and whose legitimacy is not doubtful.

Note 34 Capital

The Group's and the Bank's capital management procedures are based on the regulatory capital requirements contained in the Capital Requirements Directive (CRD) and in the Capital Requirements Regulation (CRR), which took effect on 1 January 2015. The CRD consists of three pillars two of which were represented in the financial statements:

Pillar one contains a set of rules for the mathematical calculation of capital requirements for credit, market and operational risks. These rules are set by Regulation (EU) No. 575/2013 of the European Parliament and of the Council and require banks to maintain a common equity Tier 1 capital ratio of 4.5% and a total capital adequacy ratio of 8% of risk-weighted assets. On 30 June 2015 a new requirement for Tier 1 equity items came into effect. According to these requirements, there is a need to accumulate additional reserve, which is equal to 2.5 percentage from generally evaluated risk amount. The risk weighted asset is determined based on a standard method when different risk weight is attributed to different categories of asset based on its type and risk involved, taking into account collateral and warranties, which hedge the risk. Off-balance sheet positions are evaluated in a similar way. Operating risk capital adequacy requirement is determined based on the base indicator method. 2,2 % the additional capital requirement amount is determined from 30 September 2018 during 2017 supervisory review by the Bank of Lithuania and evaluation process (SREP). Capital requirement was decreased 1.2 percentage points comparing with applied value at the beginning of the year. However, from 31 December 2018 came into force anti-cycling buffer requirement 0.5 percent for positions located in Lithuania.

CRD IV and CRR requirements for the Bank's capital adequacy ratios for the year end in percentage

Capital components	**2017**	**2018**	**2019**
General capital adequacy ratio	8.00	8.00	8.00
General capital adequacy ratio plus Pillar II	11.40	10.20	10.20
General capital adequacy ratio plus Pillar II and Capital conservation buffer	13.90	12.70	12.70

Pillar two describes the supervisory review process and requires banks to carry out an internal capital adequacy assessment process (ICAAP).

The Bank's internal capital adequacy monitoring process is reviewed at least once a year and the most critical risks to the Bank are determined. The Bank assesses that credit, market, liquidity, concentration and operating risks are the most important to the Bank's activities. Also, during the review process all of the above mentioned risks are divided into sub-categories. All structural units of the Bank are involved in self-assessment to exposure of such risks. Based on the identified significant risks, an additional capital adequacy requirement (in addition to the Pillar one ratio) is determined. An additional required capital is determined on a periodical basis based on stress testing and internal capital adequacy assessment.

(All amounts in EUR thousand unless otherwise stated)

Note 34 Capital (cont'd)

Based on self-assessment results the Bank's management determined that credit risk is the most significant to the Bank. Concentration risk is assessed as a part of credit risk. Operating risk was assessed as moderate in the Bank. The following subcategories of operating risk are analysed in the Bank: IT risk and the Bank's employees' mistake risk. Liquidity risk is managed centrally; however, due to the fact that the Bank does not have a strong parent company (financial institution), this risk is assessed as medium. Market risk includes foreign exchange, debt securities price risks. Other risks are considered as not material. There are internal regulations in the Bank which determine risk management process integrity. The risks taken by the Bank are controlled by limit system that is implemented in the Bank. In addition to the limit system, additional measures such as risk source monitoring and informing Bank's management are applied.

In addition to assessment of various risks and calculation of required additional capital stress testing for credit, liquidity, market, interest rate, foreign exchange and operational risks is performed. The purpose of such test is to determine whether the Bank's capital is sufficient to cover potential losses due to possible deterioration of the financial position of the Bank. Stress testing is performed once a year in order to comply with the regulations set by the Bank of Lithuania.

The primary objectives of the Group's and the Bank's capital management are to ensure that the Group and the Bank comply with externally imposed capital requirements and that the Group and the Bank maintain healthy capital ratios in order to support their business and to maximise the shareholders' value. Taking into consideration Regulation (EU) No. 575/2013 of the European Parliament and of the Council and capital adequacy requirements, the Bank's and the Group's total capital adequacy ratio should not be less than 12.70 percent. As at 31 December 2018, the Group's and the Bank's capital adequacy ratio on this basis exceeded the statutory minimum.

Capital adequacy ratio, according to the requirements of the Bank of Lithuania, was estimated as follows:

	2018		2017	
	Group	Bank	Group (restated)*	Bank (restated)*
Capital adequacy ratio	**17.66**	**17.14**	**15.01**	**14.59**

(All amounts in EUR thousand unless otherwise stated)

Note 35 Segment information

A summary of major indicators for the main business segments of the Group included in the Statement of financial position as at 31 December 2018 and in the Statement of comprehensive income for the year then ended is presented in the table below.

	31 December 2018				
	Traditional banking operations and lending	**Treasury**	**Other activities**	**Eliminations**	**Total**
Internal	2	-	-	(2)	-
External	8,673	561	9	-	9,243
Interest income	**8,675**	**561**	**9**	**(2)**	**9,243**
Internal	(2)	0	-	2	0
External	(1,479)	(263)	-	-	(1,742)
Interest expenses	**(1,481)**	**(263)**	**-**	**2**	**(1,742)**
Internal	-	-	-	-	-
External	7,194	298	9	-	7,501
Net interest income	**7,194**	**298**	**9**	**-**	**7,501**
Internal	-	-	-	-	-
External	5,241	-	(2)	-	5,239
Net fee and commission income	**5,241**	**-**	**(2)**	**-**	**5,239**
Internal	-	-	-	-	-
External	12,435	298	7	-	12,740
Net interest, fee and commissions income	**12,435**	**298**	**7**	**-**	**12,740**
Internal	-	-	(1,130)	1,130	-
External	(11,576)	(277)	(425)	-	(12,278)
Operating expenses	**(11,576)**	**(277)**	**(1,555)**	**1,130**	**(12,278)**
Amortisation charges	(161)	-	-	-	(161)
Depreciation charges	(486)	-	-	-	(486)
Internal	-	-	-	-	-
External	(1,257)	(56)	-	-	(1,313)
Impairment expenses	**(1,257)**	**(56)**	**-**	**-**	**(1,313)**
Internal	-	-	-	-	-
External	4,299	398	(824)	-	3,873
Net other income	**4,299**	**398**	**(824)**	**-**	**3,873**
Profit (loss) before tax	**3,254**	**363**	**(2,372)**	**1,130**	**2,375**
Income tax	11	-	-	-	11
Profit (loss) per segment after tax	**3,265**	**363**	**(2,372)**	**1,130**	**2,386**
Non-controlling interest	-	-	-	-	-
Profit (loss) for the year attributable to the owners of the Bank	**3,265**	**363**	**(2,372)**	**1,130**	**2,386**
Total segment assets	215,095	115,162	13,080	(18,574)	324,763
Total segment liabilities	289,856	7,709	76	(3,403)	294,238
Net segment assets (shareholders equity)	**(74,761)**	**107,453**	**13,004**	**(15,171)**	**30,525**

(All amounts in EUR thousand unless otherwise stated)

Note 35 Segment information (cont'd)

A summary of major indicators for the main business segments of the Group included in the Statement of financial position as at 31 December 2017 and in the statement of comprehensive income for the year then ended is presented below.

	31 December 2017				
	Traditional banking operations and lending	**Treasury**	**Other activities**	**Eliminations**	**Total**
Internal	3	-	-	(3)	-
External	7,649	575	-	-	8,224
Interest income	**7,652**	**575**	-	**(3)**	**8,224**
Internal	(3)	-	-	3	-
External	(1,454)	(104)	-	-	(1,558)
Interest expenses	**(1,457)**	**(104)**	-	**3**	**(1,558)**
Internal	-	-	-	-	-
External	6,195	471	-	-	6,666
Net interest income	**6,195**	**471**	-	-	**6,666**
Internal	-	-	-	-	-
External	3,296	-	(4)	-	3,292
Net fee and commission income	**3,296**	-	**(4)**	-	**3,292**
Internal	-	-	-	-	-
External	9,491	471	(4)	-	9,958
Net interest, fee and commissions income	**9,491**	**471**	**(4)**	-	**9,958**
Internal	-	-	(1,379)	1,379	-
External	(10,202)	(207)	(391)	-	(10,800)
Operating expenses	**(10,202)**	**(207)**	**(1,770)**	**1,379**	**(10,800)**
Amortisation charges	(200)	-	-	-	(200)
Depreciation charges	(382)	-	-	-	(382)
Internal	-	-	-	-	-
External	(233)	-	-	-	(233)
Impairment expenses	**(233)**	-	-	-	**(233)**
Internal	-	-	-	-	-
External	4,090	(159)	(641)	-	3,290
Net other income	**4,090**	**(159)**	**(641)**	-	**3,290**
Profit (loss) before tax	**2,564**	**105**	**(2,415)**	**1,379**	**1,633**
Income tax	(7)	-	-	-	(7)
Profit (loss) per segment after tax	**2,557**	**105**	**(2,415)**	**1,379**	**1,626**
Non-controlling interest	-	-	-	-	-
Profit (loss) for the year attributable to the owners of the Bank	**2,557**	**105**	**(2,415)**	**1,379**	**1,626**
Total segment assets	204,585	81,791	14,254	(15,445)	285,185
Total segment liabilities	254,316	4,600	183	(1,355)	257,744
Net segment assets (shareholders equity)	**(49,731)**	**77,191**	**14,071**	**(14,090)**	**27,441**

Note 35 Segment information (cont'd)

<u>Distribution of the Group's assets and revenue according to geographical segments.</u>

All Bank's and Group's non-current assets other than financial instruments are located in Lithuania. No material revenue is earned by the Group in foreign countries.

Note 36 Quality of financial assets, profitability ratios and other information

Financial asset quality ratios as at 31 December 2018 are provided in the table below:

Group			Bank	
Impairment (EUR thousand)	**Impairment to financial assets (%)**		**Impairment (EUR thousand)**	**Impairment to financial assets (%)**
2,416	1.50	Loans and receivables from clients	2,363	1.48
183	1.41	Finance lease receivable	183	1.41
42	0.06	Debt securities	42	0.06
13	0.10	Placements with banks	13	0.10
2,654	**1.03**	**Total**	**2,601**	**1.01**

Financial asset quality ratios as at 31 December 2017 are provided in the table below:

Group			Bank	
Impairment (EUR thousand)	**Impairment to financial assets (%)**		**Impairment (EUR thousand)**	**Impairment to financial assets (%)**
5,718	3.63	Loans and receivables from clients	5,671	3.61
35	0.29	Finance lease receivable	35	0.29
0	0	Debt securities	0	0
0	0	Placements with banks	0	0
5,753	**2.61**	**Total**	**5,706**	**2.59**

Main profitability ratios (in %) of the Bank and the Group are provided in the table below:

Group			Bank	
31 December 2018	**31 December 2017**		**31 December 2018**	**31 December 2017**
0.66	0.39	ROA	0.66	0.39
6.92	4.03	ROE	7.03	4.07

Note 37 Events after the reporting date

January 16, 2019 the main shareholder of the Bank Saulius Karosas died, this event has no significant impact on the Bank's activities, and the Bank is still managed by the Supervisory Board, the Management Board and the Chief Executive Officer. The Bank of Lithuania sees no reason to take supervisory action. In the near future, it should become clear who will become the main shareholder of the Bank.

As long as the Bank of Lithuania has not granted a permission for another person to take over Saulius Karosas' shares, as well as until the Bank is informed about the transfer of ownership of Saulius Karosas shares to another person, the other person will not have the right to exercise the rights granted by these shares, including voting at the general shareholders meetings.

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