

QNB Finansbank Anonim Şirketi And Subsidiaries

Consolidated Financial Statements as at and for the Year Ended December 31, 2019

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Report on the Audit of the Consolidated Financial Statements

To the Board of Directors of QNB Finansbank A.Ş.

Opinion

We have audited the consolidated financial statements of QNB Finansbank A.Ş. (the "Bank") and its subsidiaries (together referred to as the "Group"), which comprise the consolidated statement of financial position as at December 31, 2019, and the consolidated statement of profit or loss, consolidated statement of other comprehensive income, consolidated statement of changes in equity and consolidated statement of cash flows for the year then ended, and notes to the consolidated financial statements, including a summary of significant accounting policies.

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

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the Group in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) together with the ethical requirements that are relevant to our audit of the financial statements in Turkey, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters

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

We have fulfilled the responsibilities described in the Auditor's responsibilities for the audit of the financial statements section of our report, including in relation to these matters. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement of the financial statements. The results of our audit procedures, including the procedures performed to address the matters below, provide the basis for our audit opinion on the accompanying consolidated financial statements.

Key Audit Matter	How the matter is addressed in our audit
Recognition of impairment on financial assets within the scope of IFRS 9 "Financial Instruments" Standard and related significant disclosures	
As presented in Note 2.13 as the Group recognizes expected credit losses of financial assets in accordance with IFRS 9. We considered the impairment of financial assets as a key audit matter since: - Amount of on and off balance sheet items that are subject to expected credit loss calculation is material to the financial statements - There are complex and comprehensive requirements of IFRS 9 - Policies implemented by the Group management include compliance risk to the regulations and other practices Structured processes of IFRS 9 are advanced and complex Judgements and estimates used in expected credit loss calculation are complex and comprehensive Disclosure requirements of IFRS 9 are comprehensive and complex	Information technology and Process audit specialists. - Evaluating the reasonableness of management's key judgements, estimates and data sources used in expected credit loss calculations considering the standard requirements, sectorial, local and global practices

- Evaluating the judgments and estimates used for the individually assessed financial assets

Hedge Accounting

As explained Note 22, the Group enters into hedge relationships to manage exposures to interest rate, and foreign currency risks. In order to manage particular risks, the Group applies hedge accounting for transactions that meet the specified criteria. The Group uses of derivatives and other hedge relationships to hedge the financial risk of its deposits, loans, financial assets at fair value through other comprehensive income, Finance lease receivables, bond issued and borrowings. The Group documents the hedge relationship between hedging instruments and hedged items at inception, as well as their risk management objectives and the strategy for undertaking various hedge transactions. The Group also documents its assessment, both at hedge inception and on an ongoing basis, of whether the instruments that are used in hedging transactions are highly effective in offsetting changes in values of hedged items. The Group performs prospective and retrospective effective effectiveness tests and accounts the results in accordance with IFRS. There is a potential risk that hedge relationship is not eligible, effective, accounted correctly nor documentation and termination of hedge relationship including the effect of termination on the carrying amount of assets in accordance with IFRS.

In addition to general audit procedures our audit procedures include the re-calculation of fair values of derivative financial instruments, assessment of the financial risk components, documentation of all hedging relationships, examination of the effectiveness tests, the review of hedge accounting records, evaluating the appropriateness of the carrying amount of the asset in accordance with the relevant standards in case of a termination.

Our procedures included, amongst others, recalculating fair value calculation, assessment of financial risk component, reviewing hedge documentation for all hedge relationships, effectiveness tests, hedge accounting entries, evaluating the appropriateness of the carrying amount of the asset in accordance with the relevant standards in case of a termination. and disclosures relating to derivative financial instruments and hedge accounting considering the requirements of IFRS.

Valuation of Derivative Financial Instruments

Derivative financial instruments including foreign exchange contracts, forward rate agreements, currency and interest rate swaps, interest rate futures, currency and interest rate options (both written and purchased), credit default swaps and other derivative financial instruments are initially recognized on the statement of financial position at fair value and subsequently are re-measured at their fair value. There is a potential risk in fair valuation of derivative instruments in accordance with IFRS. Details of the related amounts are explained in Note 22.

The fair value of derivative financial instruments is determined by selecting the most appropriate market data and applying valuation techniques for certain products. Due to the assumptions, estimates and subjectivity used in these applications, derivative financial instruments are considered as a key audit matter by us.

In addition to our auditing procedures, include reviewing the fair valuation policies as determined by the Group Management, checking the fair value calculations of the derivative financial instruments chosen by the sample as valuation experts, evaluating the assumptions and estimates used, operational evaluation and testing.

Responsibilities of the Board of Directors for the consolidated financial statements

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

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

The Board of Directors are responsible for overseeing the Group's financial reporting process.

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

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

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

- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors
- Conclude on the appropriateness of the Board of Director's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- 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 the Board of Directors 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 the Board of Directors with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with the Board of Directors we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's 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.

The engagement partner who supervised and concluded this independent auditor's report is Hatice Dilek Çilingir Köstem.

Güney Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik Anonim Şirketi A member firm of Ernst & Young Global Limited

Hatice Dilek Çilingir Köstem, SMMM Partner

Istanbul, Turkey April 29, 2020

Certification of the Board of Directors and Chief Financial Officer

We, the members of the Board of Directors of QNB Finansbank A.Ş. and Group CFO certify that to the best of our knowledge:

The financial statements for the annual period ended December 31, 2019 have been prepared in accordance with International Financial Reporting Standards – IFRS and present a true and fair view of the assets, liabilities, equity and results of operations of the Bank and of the consolidated companies included in the consolidation.

Ali Teoman Kerman

Member of the Board of
Directors and Chairman of the
Audit Committee

Temel Güzeloğlu

General Manager and Member of the Board of Directors

Adnan Menderes Yayla

Group CFO

CONSOLIDATED STATEMENT OF PROFIT OR LOSS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

		12 month period er	nded December 31,
	Notes	2019	2018
Interest income	7	19,447,317	17,447,591
Interest expense	7	(12,980,227)	(11,273,182)
Net interest income		6,467,090	6,174,409
Fee and commission income	8	2,747,769	2,197,118
Fee and commission expense	8	(138,212)	(123,960)
Net fee and commission income		2,609,557	2,073,158
Dividend income		2,934	5,716
Net trading income and results from investment		2,934	5,710
securities	9	223,003	634,116
Other operating income	10	175,199	92,442
Total operating income	10	9,477,783	8,979,841
Personnel expenses	11	(1,842,539)	(1,531,211)
General and administrative expenses	13	(1,690,033)	(1,640,643)
Depreciation, amortization and impairment charges	14	(518,797)	(260,340)
Impairment losses on loans and advances to customers, finance lease receivables, factoring receivables and			
other impairment charges	15	(2,006,832)	(2,254,328)
Share in the profit of joint ventures	28	89,429	48,669
Other provision expenses	16	(20,346)	(91,647)
Profit before tax		3,488,665	3,250,341
Income tax expense	17	(625,125)	(697,924)
Profit for the year		2,863,540	2,552,417
Attributable to:			
Equity holders of the Parent		2,862,992	2,551,920
Non-controlling interest		548	497
Earnings per share - Basic and Diluted (Full TL)	18	0.0855	0.0762

CONSOLIDATED STATEMENT OF OTHER COMPREHENSIVE INCOME FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

	12 month period en		
		Decembe	er 31,
	Notes	2019	2018
Profit for the year		2,863,540	2,552,417
Items that may be recycled to profit or loss			
FVOCI investment securities reserve		280,269	(424,103)
Net change in fair value	26	304,935	(415,004)
Net amount transferred to profit or loss	41	(24,666)	(9,099)
Net gain on cash flow hedges		(1,233,787)	209,669
Net change in fair value	41	(1,093,633)	209,001
Net amount transferred to profit or loss	41	(140,154)	668
Items that will not be recycled to profit or loss			
Actuarial gains / (losses) related to employee benefits		(31,089)	20,882
Effect of changes in actuarial assumptions	12	(31,089)	20,882
FVOCI equity securities reserve		60,293	24,064
Net change in fair value		60,293	24,064
Income tax relating to components of other comprehensive			
income	31	220,396	40,256
Other comprehensive income for the year, net of tax		(703,918)	(129,232)
Total comprehensive income for the year		2,159,622	2,423,185
Total comprehensive income attributable to:	•	2,159,622	2,423,185
Equity holders of the Parent	•	2,159,074	2,422,688
Non-controlling interests		548	497

The accompanying policies and explanatory notes are an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF FINANCIAL POSITION AS AT DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

	Notes _	December 31, 2019	December 31, 2018
ASSETS			
Cash and balances with T.R. Central Bank (net)	19	18,748,252	18,474,318
Due from banks (net)	20	7,447,689	3,880,878
Financial assets at fair value through profit or loss	21	293,398	45,739
Hedging derivatives	22	4,186,871	6,968,946
Trading derivatives	22	3,752,438	5,432,383
Loans and advances to customers	23	109,445,928	93,467,525
Factoring receivables	24	1,630,527	1,208,884
Finance lease receivables	25	5,583,145	5,521,076
	23	3,303,143	3,321,070
Investments measured at fair value through other	26	12 252 279	0 151 751
comprehensive income (FVOCI)	20	12,352,278	8,451,754
of which pledged as colleteral	27	841,193	721,026
Investments measured at amortised cost	27	16,169,450	12,895,116
of which pledged as colleteral		480,949	991,562
Investments in joint ventures	28	199,384	158,380
Intangible assets	29	479,435	433,889
Property and equipment	30	3,408,352	2,893,451
Deferred tax assets (net)	31	448,047	613,768
Other assets	32	2,974,957	2,700,827
Total assets	- -	187,120,151	163,146,934
LIABILITIES			
Due to banks	33	18,322,139	15,132,315
Customer deposits	34	100,101,599	83,153,195
Hedging derivatives	22	1,570,416	719,479
Trading derivatives	22	3,565,077	5,730,710
Debt securities issued	35	14,346,112	11,791,532
Funds borrowed	36	24,799,107	25,372,367
Current tax liabilities	17	207,492	153,080
Retirement benefit obligations	12	256,263	193,133
Other provisions	37	330,639	320,498
Other liabilities	38	6,831,983	5,950,923
Lease liability	-	442,926	1 40 515 000
Total liabilities	-	170,330,827	148,517,232
EQUITY			
Share capital issued	40	3,350,000	3,350,000
Share premium		714	714
Financial assets at FVOCI reserve, net of tax	41	(169,391)	(452,050)
Actuarial losses, net of tax	4.1	(80,348)	(55,799)
Cash flow hedging reserve, net of tax	41	(564,969)	397,059
Reserves and retained earnings	41,42	14,246,241	11,383,249
Equity attributable to owners of the Group	_	16,782,247	14,623,173
Non-controlling interest	_	7,077	6,529
Total equity	-	16,789,324	14,629,702
Total equity and liabilities	=	187,120,151	163,146,934

The accompanying policies and explanatory notes are an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

				Othe	r Comprehensive	Income/Expense	e Items				
				to be Recy	cled to Profit or	not to be Rec	cycled to Profit				
					Loss	or	Loss				
				FVOCI investment	Net gains/(losses)		FVOCI equity	Reserves	Equity attributable		
				securities	on cash flow	Pension	securities	and	to		
		Share	Share	reserve,net	hedges,net of	reserve,net	reserve,net	Retained	Finansbank	Minority	
	Notes	Capital	Premium	of tax	tax	of tax	of tax	Earnings	shareholders	interest	Total
Balance at January 1, 2018		3,350,000	714	(162,727)	231,847	(72,343)	21,665	8,931,329	12,300,485	7,605	12,308,090
Profit for the year		-	-	-	-	-	-	2,551,920	2,551,920	497	2,552,417
Other comprehensive income for the year, net of											
tax		-	-	(333,849)	165,212	16,544	22,861	-	(129,232)	-	(129,232)
Total comprehensive income for the year, net											
of tax		-	-	(333,849)	165,212	16,544	22,861	2,551,920	2,422,688	497	2,423,185
Issue of share capital (Note 42)		-	-	-	-	-	-	-	-	-	-
Dividends paid (Note 40,42)		-	-	-	-	-	-	(100,000)	(100,000)	-	(100,000)
Changes in consolidation structure due to											
acquisition of the shares from non-controlling										(1.572)	(1.572)
interest in subsidiaries		2 250 000	714	(406.556)	207.050	(55.500)	44.526	11 202 240	14 (22 172	(1,573)	(1,573)
Balance at December 31, 2018		3,350,000	714	(496,576)	397,059	(55,799)	44,526	11,383,249	14,623,173	6,529	14,629,702
Balance at January 1, 2019		3,350,000	714	(496,576)	397,059	(55,799)	44,526	11,383,249	14,623,173	6,529	14,629,702
Profit for the year		-	-	-	-	-	-	2,862,992	2,862,992	548	2,863,540
Other comprehensive income for the year, net of											
tax		-	-	225,381	(962,028)	(24,549)	57,278	-	(703,918)	-	(703,918)
Total comprehensive income for the year, net											
of tax		-	-	225,381	(962,028)	(24,549)	57,278	2,862,992	2,159,074	548	2,159,622
Issue of share capital		-	-	-	-	-	-	-	-	-	-
Dividends paid (Note 42)		-	-	-	-	-	-	-	-	-	-
Changes in consolidation structure due to											
acquisition of the shares from non-controlling											
interest in subsidiaries		2.250.000	-	(251 105)	(5(4,0(0)	(00.240)	101.001	-	1 (500 0 15	-	1 (500 20 1
Balance at December 31, 2019		3,350,000	714	(271,195)	(564,969)	(80,348)	101,804	14,246,241	16,782,247	7,077	16,789,324

The accompanying policies and explanatory notes are an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF CASH FLOWS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

		12 month period ende	ed December 31,
	Note	2019	2018
Cold Complete Control of the Cold Control of the Control of t			
Cash flows from operating activities Interest received		18,923,480	14,625,642
Interest paid		(13,035,594)	(7,562,643)
Income from associates and dividends received		2,934	5,716
Fee and commission received		2,753,754	2,198,951
Trading gain / (loss)		4,806,656	3,265,183
Recoveries of loans previously written off and impaired loans		1,523,298	1,288,720
Fee and commission paid		(138,212)	(123,960)
Cash payments to employees and suppliers		(2,752,286)	(2,433,899)
Cash received from other operating activities		175,199	92,442
Cash paid for other operating activities		(254,380)	(531,686)
Income and other taxes paid		(768,678)	(798,465)
Cash flows from operating activities before changes in operating			
assets and liabilities		11,236,171	10,026,001
Changes in operating assets and liabilities		4.007.000	4 4 4 4 9 9 9 9
Due from banks		1,885,300	(1,464,283)
Financial assets at fair value through profit or loss		(247,659)	43,651
Loans and advances to customers		(15,181,617)	(4,742,545)
Factoring receivables		(421,643)	177,095
Finance lease receivables Other assets		51,262 (1,390,328)	(583,889) (2,742,932)
Due to other banks		2,723,211	2,101,017
Customer deposits		12,444,766	7,413,058
Other liabilities		452,685	291,378
		11,552,148	10,518,551
Net cash used in/provided by operating activities		11,552,140	10,510,551
Cash flows from investing activities			
Purchases of FVOCI investments	26	(6,525,366)	(2,249,770)
Proceeds from sale and redemption of FVOCI investments	26	3,797,849	876,324
Purchase of amortised cost investment securities	27	(2,628,259)	(2,163,995)
Redemption of amortised cost investment securities	27	1,496,516	815,934
Acquisitions of property and equipment		(256,805)	(1,054,034)
Proceeds from the disposal of property and equipment	20	32,144	15,253
Acquisitions of intangible assets	29	(185,854)	(209,358)
Dividend received from investment in joint ventures	28	48,425	25,626
Net cash used in investing activities		(4,221,350)	(3,944,020)
Cash flows from financing activities	25 20	6 640 621	7 900 542
Proceeds from funds borrowed and debt securities Payments of funds borrowed and debt securities	35, 36 35, 36		7,890,543 (10,535,519)
Dividends paid to equity holders of the parent	33, 30	(0,407,901)	(10,333,319)
Other		(196,394)	194
Net cash used in provided by financing activities		$\frac{(2,014,664)}{(2,014,664)}$	(2,744,782)
rect cash used in provided by infancing activities		(2,017,007)	(=,133,102)
Effect of net foreign exchange differences on cash and cash equivalents		356,419	(700,930)
Net increase in cash and cash equivalents		5,672,553	3,128,819
Cash and cash equivalents at the beginning of the year	43	9,218,115	6,089,296
		14,890,668	9,218,115
Cash and cash equivalents at the end of the year	43	1,070,000	~, 210,110

The accompanying policies and explanatory notes are an integral part of these consolidated financial statements.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

1 General information

QNB Finansbank Anonim Şirketi (hereinafter the "Bank" or "QNB Finansbank") was incorporated in Istanbul on September 23, 1987, by the Fiba Group ("Fiba"). The Bank was listed on the Istanbul Stock Exchange on February 3, 1990. Currently the Bank only has a free float of 0.19% of its shares. The registered address of the Bank is at Kristal Kule, Büyükdere Caddesi, No 215, Şişli 34394 Istanbul, Turkey.

A share sales agreement has been concluded between National Bank of Greece S.A. (NBG) and Qatar National Bank ("QNB") at a price of EUR 2.750 million as of December 21, 2015. Necessary permissions related to share transfer have been completed on May 4, 2016. After receipt of permission from Competition Board on May 4, 2016 for the Bank, related permissions from regulatory bodies for the subsidiaries were completed on May 12, 2016, consequently share transfer of the Bank has been completed on June 15, 2016.

99.88% of shares of QNB Finansbank A.Ş. are controlled by Qatar National Bank as of December 31, 2018 and remaining 0.12% of related shares are public shares.

50% of QNB shares, the first commercial bank of Qatar was founded in 1964 and has been traded on the Qatar Stock Exchange since 1997, are owned by Qatar Investment Authority while 50% of related shares are public shares. QNB is operating over 30 countries mainly in the Middle East and North Africa

Regions as well as being the biggest bank of Qatar. Also with respect to total assets, total credits and total deposits QNB is the biggest bank of Middle East and North Africa.

The Bank has decided to change the logo and the name of the company within the scope of the main shareholder change and brand strategies and the new logo of the Parent Bank has started to be used as "QNB FİNANSBANK" as of October 20, 2016. According to the decision dated January 17, 2018 which was taken by the General Assembly, "The Bank's trade name is changed from FİNANS BANK A.Ş to QNB FİNANSBANK A.Ş as of January 19, 2018.

The accompanying consolidated financial statements of the Bank for the year ended December 31, 2019 comprise the Bank and its subsidiaries (together referred to as the "Group") listed in Note 45.

Nature of Activities of the Bank / Group

The Group's activities include trade finance, corporate and commercial banking, treasury, retail banking and credit card operations. The Bank operates through a total of 525 branches, of which 523 are domestic branches, 2 in the İstanbul Atatürk Airport Free Trade Zone, and an off-shore banking branch in Bahrain.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

1.1 Information About the Chairman and Members of Board of Directors, Members of Audit Committee, Managing Director and Executive Vice Presidents; Any Changes, and the Information About the Parent Bank Shares They Hold and Their Responsibilities

		Date of	<u> </u>
Name	Title	Appointment	Education
Dr. Ömer A. Aras	Chairman	April 16, 2010	PhD
Sinan Şahinbaş	Vice Chairman	April 16, 2010	Masters
Ali Teoman Kerman	Board Member and Chairman of the Audit Committee	April 16, 2013	Masters
Ramzi T. A. Mari	Board Member and Audit Committee Member	June 16, 2016	Masters
Fatma Abdulla S.S. Al-Suwaidi	Board Member	June 16, 2016	Masters
Durmuş Ali Kuzu	Board Member and Audit Committee Member	August 25, 2016	PhD
Temel Güzeloğlu	Board Member and General Manager	April 16, 2010	Masters
Yousef Mahmoud H N Al-Neama	Board Member	May 28, 2019	Graduate
Assoc. Prof. Dr. Osman Reha Yolalan	Board Member	June 16, 2016	PhD
Adel Ali M A Al-Malki	Board Member	May 28, 2019	Graduate
Noor Mohd J. A. Al-Naimi	Board Member and Audit Committee Member	June 22, 2017	Graduate
Adnan Menderes Yayla	Executive Vice President	May 20, 2008	Masters
Köksal Çoban	Executive Vice President	August 19, 2008	Masters
Dr. Mehmet Kürşad Demirkol	Executive Vice President	October 8, 2010	PhD
Erkin Aydın	Executive Vice President	May 16, 2011	Masters
Ömür Tan	Executive Vice President	October 28, 2011	Masters
Halim Ersun Bilgici	Executive Vice President	March 15, 2013	Masters
Enis Kurtoğlu	Executive Vice President	May 14, 2015	Masters
Murat Koraş	Executive Vice President	May 14, 2015	Masters
Engin Turhan	Executive Vice President	June 14, 2016	Masters
Cumhur Türkmen	Executive Vice President	June 11, 2018	Graduate
Cenk Akıncılar	Executive Vice President	January 21,2019	Graduate
Burçin Dündar Tüzün(*)	Executive Vice President	December 1, 2019	Masters
Zeynep Kulalar(**)	Executive Vice President	December 1, 2019	Graduate
Ahmet Erzengin	Head of the Department of Internal Control and Compliance	September 12, 2012	Graduate
Ersin Emir	Head of Internal Audit	February 18, 2011	Masters
Zeynep Aydın Demirkıran	Head of the Department of Risk Management	September 16, 2011	Masters

^(*) As of December 1, 2019, Burçin Dündar Tüzün has been appointed as Assistant General Manager responsible for Corporate and Commercial Loans.

These financial statements have been approved for issue by the Bank's Board of Directors on April 29, 2020.

^(**) As of December 1,2019, Zeynep Kulalar has been appointed as the Assistant General Manager responsible for Corporate Banking.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2 Summary of significant accounting policies

2.1 Basis of preparation

The consolidated financial statements have been prepared in accordance with International Financial Reporting Standards ("IFRS") as issued by the International Accounting Standards Board ("IASB").

The consolidated financial statements have been prepared under the historical cost convention except for financial assets measured at fair value such as derivative financial instruments, financial assets at fair value through profit or loss and financial assets at fair value through other comprehensive income (OCI). The carrying values of recognised assets and liabilities that are hedged items in fair value hedges, and otherwise carried at amortised cost, are adjusted to record changes in fair value attributable to the risks that are being hedged.

The consolidated financial statements are presented in Turkish Lira ("TL") and except as indicated, financial information presented in TL has been rounded to the nearest thousand.

The Bank maintains its books of accounts and prepares its statutory financial statements in accordance with the Banking Law and the "Regulation on Accounting Applications for Banks and Safeguarding of Documents" published in the Official Gazette No. 26333 dated November 1, 2006, which refers to Turkish Accounting Standards and Turkish Financial Reporting Standards issued by Public Oversight Accounting and Auditing Standards Authority "POAASA" and additional explanations and notes related to them and other decrees, notes and explanations related to accounting and financial reporting principles published by the Banking Regulation and Supervision Agency ("BRSA") and other relevant rules promulgated by the Turkish Commercial Code, Capital Markets Board and Tax Regulations.

The subsidiaries maintain their books of accounts based on statutory rules and regulations applicable in their jurisdictions. The accompanying financial statements are derived from statutory financial statements with adjustments and reclassifications for the purpose of presentation in accordance with IFRS.

The preparation of financial statements in conformity with IFRS requires the use of estimates and assumptions that affect the reported amounts of assets and liabilities, the disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Use of available information and application of judgment are inherent in the formation of estimates in the following areas: valuation of over-the-counter ("OTC") derivatives, unlisted securities, retirement benefits obligation, impairment of loans and receivables, provisions for taxes and contingencies from litigation. Actual results in the future may differ from those reported.

The areas involving a higher degree of judgment or complexity, or areas where assumptions and estimates are significant to the consolidated financial statements are disclosed in Note 3.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2.2 Adoption of International Financial Reporting Standards (IFRS)

The accounting policies adopted in preparation of the consolidated financial statements as at December 31, 2019 are consistent with those of the previous financial year, except for the adoption of new and amended IFRS and IFRIC interpretations effective as of January 1, 2019. The effects of these standards and interpretations on the Group's financial position and performance have been disclosed in the related paragraphs.

i) The new standards, amendments and interpretations which are effective as at January 1, 2019 are as follows:

IFRS 16 Leases

The IASB has published a new standard, IFRS 16 'Leases'. The new standard brings most leases on-balance sheet for lessees under a single model, eliminating the distinction between operating and finance leases. Lessor accounting however remains largely unchanged and the distinction between operating and finance leases is retained. IFRS 16 supersedes IAS 17 'Leases' and related interpretations and is effective for periods beginning on or after January 1, 2019.

Lessees have recognition exemptions to applying this standard in case of short-term leases (i.e., leases with a lease term of 12 months or less) and leases of 'low-value' assets (e.g., personal computers, office equipment, etc.). At the commencement date of a lease, a lessee measures the lease liability at the present value of the lease payments that are not paid at that date (i.e., the lease liability), at the same date recognises an asset representing the right to use the underlying asset (i.e., the right-of-use asset) and depreciates it during the lease term. The lease payments shall be discounted using the interest rate implicit in the lease, if that rate can be readily determined. If that rate cannot be readily determined, the lessee shall use the lessee's incremental borrowing rate. Lessees are required to recognise the interest expense on the lease liability and the depreciation expense on the right-of-use asset separately.

Lessees are required to remeasure the lease liability upon the occurrence of certain events (e.g. a change in the lease term, a change in future lease payments resulting from a change in an index or rate used to determine those payments). Under these circumstances, the lessee recognises the amount of the remeasurement of the lease liability as an adjustment to the right-of-use asset.

Set out below are the new accounting policies of the Group upon adoption of IFRS 16:

Right of Use Assets

The Group recognises right-of-use assets at the commencement date of the lease (i.e., the date the underlying asset is available for use). Right-of-use assets are measured at cost, less any accumulated depreciation and impairment losses, and adjusted for any remeasurement of lease liabilities. The cost of right-of-use assets includes the amount of lease liabilities recognised, initial direct costs incurred, and lease payments made at or before the commencement date less any lease incentives received.

The right to use includes the presence of:

- The initial measurement of the lease;
- The amount obtained by deducting all lease payments received from all lease payments made on or on the date of actual lease, and
- All initial direct costs incurred by the Group.

At the end of the lease term of the underlying asset's service, the transfer of the Group is reasonably finalized, and the Group depreciates the asset until the end of the life of the underlying asset on which the lease actually began. Right-of-use assets are subject to impairment.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2.2 Adoption of International Financial Reporting Standards (IFRS) (continued)

Lease Liabilities

The Group measures the lease obligation at the present value of the unpaid lease payments on the date that the lease commences.

Lease payments included in the measurement of the lease obligation on the date that the lease actually commences, consists of the following payments to be made for the right of use of the underlying asset during the lease period and not paid on the date the lease actually starts:

- Fixed payments,
- Variable lease payments based on an index or rate, the first measurement made using an index or rate on the actual date of the lease.
- Amounts expected to be paid by the Group under the residual value commitments
- The use price of this option and, if the Group is reasonably confident that it will use the purchase option;
- Fines for termination of the lease if the lease term indicates that the Group will use an option to terminate the lease.

Variable lease payments that do not depend on an index or rate are recognized as an expense in the period in which the event or condition that triggered the payment occurred. The Group revises the revised discount rate for the remainder of the lease term, if the implicit interest rate in the lease can be easily determined; the Group's alternative borrowing interest rate at the date of the revaluation.

After the effective date of the lease, the Group measures the lease obligation as follows:

- Increase the carrying amount to reflect the interest on the lease obligation; and
- Decreases the carrying amount to reflect the lease payments made.

In addition, in the event of a change in the lease term, in essence a change in fixed lease payments or a change in the assessment of the option to buy the underlying asset, the value of the lease obligations is remeasured.

Short-Term Leases and Leases of Low-Value Assets

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

As of January 1, 2019, the effect of IFRS 16 "Leases" standard application on the financial assets is shown below:

Assets	
Property, plant and equipment (right-of-use assets)	442,945
Liabilities	
Lease liabilities	(442,926)

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2.2 Adoption of International Financial Reporting Standards (IFRS) (continued)

Amendments to IAS 28 "Investments in Associates and Joint Ventures" (Amendments)

In October 2017, the IASB issued amendments to IAS 28 *Investments in Associates and Joint Ventures*. The amendments clarify that a company applies IFRS 9 *Financial Instruments* to long-term interests in an associate or joint venture that form part of the net investment in the associate or joint venture.

IFRS 9 Financial Instruments excludes interests in associates and joint ventures accounted for in accordance with IAS 28 Investments in Associates and Joint Ventures. In this amendment, IASB clarified that the exclusion in IFRS 9 applies only to interests a company accounts for using the equity method. A company applies IFRS 9 to other interests in associates and joint ventures, including long-term interests to which the equity method is not applied and that, in substance, form part of the net investment in those associates and joint ventures.

The interpretation is not applicable for the Group and did not have an impact on the financial position or performance of the Group.

IFRIC 23 Uncertainty over Income Tax Treatments

The interpretation clarifies how to apply the recognition and measurement requirements in "IAS 12 Income Taxes" when there is uncertainty over income tax treatments.

When there is uncertainty over income tax treatments, the interpretation addresses:

- (a) whether an entity considers uncertain tax treatments separately;
- (b) the assumptions an entity makes about the examination of tax treatments by taxation authorities;
- (c) how an entity determines taxable profit (tax loss), tax bases, unused tax losses, unused tax credits and tax rates; and
- (d) how an entity considers changes in facts and circumstances.

The interpretation did not have an impact on the financial position or performance of the Group.

Annual Improvements – 2015–2017 Cycle

In December 2017, the IASB issued Annual Improvements to IFRS Standards 2015–2017 Cycle, amending the following standards:

- IFRS 3 Business Combinations and IFRS 11 Joint Arrangements The amendments to IFRS 3 clarify that when an entity obtains control of a business that is a joint operation, it remeasures previously held interests in that business. The amendments to IFRS 11 clarify that when an entity obtains joint control of a business that is a joint operation, the entity does not remeasure previously held interests in that business.
- IAS 12 Income Taxes The amendments clarify that all income tax consequences of dividends (i.e. distribution of profits) should be recognised in profit or loss, regardless of how the tax arises.
- IAS 23 Borrowing Costs The amendments clarify that if any specific borrowing remains outstanding after the related asset is ready for its intended use or sale, that borrowing becomes part of the funds that an entity borrows generally when calculating the capitalisation rate on general borrowings.

The amendments are not applicable for the Group and did not have an impact on the financial position or performance of the Group.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2.2 Adoption of International Financial Reporting Standards (IFRS) (continued)

Plan Amendment, Curtailment or Settlement" (Amendments to IAS 19)

On February 7, 2018, the IASB published Amendments to IAS 19 "Plan Amendment, Curtailment or Settlement" The amendments require entities to use updated actuarial assumptions to determine current service cost and net interest for the remainder of the annual reporting period after a plan amendment, curtailment or settlement occurs. These amendments are applied for annual periods beginning on or after January 1, 2019. The interpretation did not have an impact on the financial position or performance of the Group.

Prepayment Features with Negative Compensation (Amendments to IFRS 9)

The IASB issued minor amendments to IFRS 9 Financial Instruments to enable companies to measure some prepayable financial assets at amortised cost.

Applying IFRS 9, a company would measure a financial asset with so-called negative compensation at fair value through profit or loss. Applying the amendments, if a specific condition is met, entities will be able to measure at amortised cost some prepayable financial assets with so-called negative compensation.

The Group is in the process of assessing the impact of the amendments on financial position or performance of the Group.

ii) Standards issued but not yet effective and not early adopted

Standards, interpretations and amendments to existing standards that are issued but not yet effective up to the date of issuance of the consolidated financial statements are as follows. The Group will make the necessary changes if not indicated otherwise, which will be affecting the consolidated financial statements and disclosures, when the new standards and interpretations become effective.

IFRS 10 and IAS 28: Sale or Contribution of Assets between an Investor and its Associate or Joint Venture (Amendments)

In December 2015, the IASB postponed the effective date of this amendment indefinitely pending the outcome of its research project on the equity method of accounting. Early application of the amendments is still permitted. The Group will make the necessary changes if not indicated otherwise, which will be affecting the consolidated financial statements and disclosures, when the new standards and interpretations become effective.

IFRS 17 - The new Standard for insurance contracts

The IASB issued IFRS 17, a comprehensive new accounting standard for insurance contracts covering recognition and measurement, presentation and disclosure. IFRS 17 model combines a current balance sheet measurement of insurance contract liabilities with the recognition of profit over the period that services are provided. Certain changes in the estimates of future cash flows and the risk adjustment are also recognised over the period that services are provided. Entities will have an option to present the effect of changes in discount rates either in profit and loss or in OCI. The standard includes specific guidance on measurement and presentation for insurance contracts with participation features. IFRS 17 will become effective for annual reporting periods beginning on or after January 1, 2023; early application is permitted. The standard is not applicable for the Group and will not have an impact on the financial position or performance of the Group.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2.2 Adoption of International Financial Reporting Standards (IFRS) (continued)

Definition of a Business (Amendments to IFRS 3)

In October 2018, the IASB issued amendments to the definition of a business in IFRS 3 Business Combinations. The amendments are intended to assist entities to determine whether a transaction should be accounted for as a business combination or as an asset acquisition.

The amendments:

- clarify the minimum requirements for a business;
- remove the assessment of whether market participants are capable of replacing any missing elements;
- add guidance to help entities assess whether an acquired process is substantive;
- narrow the definitions of a business and of outputs; and
- introduce an optional fair value concentration test.

The amendments to IFRS 3 are effective for annual reporting periods beginning on or after January 1, 2020 and apply prospectively. Earlier application is permitted.

The amendments are not applicable for the Group and will not have an impact on the financial position or performance of the Group.

Definition of Material (Amendments to IAS 1 and IAS 8)

In October 2018, the IASB issued amendments to IAS 1 Presentation of Financial Statements and IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors to align the definition of 'material' across the standards and to clarify certain aspects of the definition. The new definition states that, 'Information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements, which provide financial information about a specific reporting entity. The amendments clarify that materiality will depend on the nature or magnitude of information, or both. An entity will need to assess whether the information, either individually or in combination with other information, is material in the context of the financial statements.

The amendments to IAS 1 and IAS 8 are required to be applied for annual periods beginning on or after January 1, 2020. The amendments must be applied prospectively and earlier application is permitted.

The Group is in the process of assessing the impact of the amendments on financial position or performance of the Group.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2.2 Adoption of International Financial Reporting Standards (IFRS) (continued)

Amendments to IFRS 9, IAS 39 and IFRS 7- Interest Rate Benchmark Reform

The amendments issued to IFRS 9 and IAS 39 which are effective for periods beginning on or after January 1, 2020 provide certain reliefs for 4 fundamental matters in connection with interest rate benchmark reform. These reliefs are related to hedge accounting as follows:

- Highly probable requirement
- Prospective Assessments
- Retrospective Assessments
- Separately identifiable risk components

Reliefs used as a result of amendments in IFRS 9 and IAS 39 is aimed to be disclosed in financial statements based on the amendments made in IFRS 7.

The Group is in the process of assessing the impact of the amendments on financial position or performance.

Amendments to IAS 1- Classification of Liabilities as Current and Non-Current Liabilities

January 23, 2020, the IASB issued amendments to IAS 1 Presentation of Financial Statements. The amendments issued to IAS 1 which are effective for periods beginning on or after January 1, 2022, clarify the criteria for the classification of a liability as either current or non-current. Amendments must be applied retrospectively in accordance with IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors. Early application is permitted.

The Group is in the process of assessing the impact of the amendments on financial position or performance.

2.3 Consolidation

2.3.1 Basis of consolidation

The consolidated financial statements incorporate the financial statements of the Bank and its subsidiaries (including special purpose entities), which are entities controlled by the Bank. Control is achieved when the Group is exposed, or has rights, to variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee.

Income and expenses and other comprehensive income of subsidiaries acquired or disposed of during the year are included in the consolidated statement of profit or loss and in the consolidated statement of other comprehensive income, respectively, from the effective date of acquisition and up to the effective date of disposal, as appropriate. Profit for the period and total comprehensive income of subsidiaries is attributed to the owners of the Bank and to the non-controlling interests even if this results in the non-controlling interests having a deficit balance.

When necessary, adjustments are made to the financial statements of subsidiaries to bring their accounting policies into line with those of the Group.

All intra-group transactions, balances, income and expenses are eliminated in full on consolidation.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2.3 Consolidation (continued)

2.3.2 Non-controlling interests

Non-controlling interests that are present ownership interests and entitle their holders to a proportionate share of the entity's net assets in the event of liquidation may be initially measured either at fair value or at the non-controlling interests' proportionate share of the recognized amounts of the acquiree's identifiable net assets. The choice of measurement basis is made on a transaction-by-transaction basis. Other types of non-controlling interests are measured at fair value or, when applicable, on the basis specified in another IFRS. Subsequent to acquisition, the carrying amount of non-controlling interests is the amount of those interests at initial recognition plus the non-controlling interests' share of subsequent changes in equity. Total comprehensive income is attributed to non-controlling interests even if this results in the non-controlling interests having a deficit balance.

2.3.3 Changes in the Group's ownership interests in subsidiaries that do not result in loss of control

Changes in the Group's ownership interests in subsidiaries that do not result in the Group losing control over the subsidiaries are accounted for as equity transactions. The carrying amounts of the Group's interests and the non-controlling interests are adjusted to reflect the changes in their relative interests in the subsidiaries. Any difference between the amount by which the non-controlling interests are adjusted and the fair value of the consideration paid or received is recognized directly in equity and attributed to owners of the Bank.

2.3.4 Loss of control

When the Group loses control of a subsidiary, the profit or loss on disposal is calculated as the difference between (i) the aggregate of the fair value of the consideration received and the fair value of any retained interest and (ii) the previous carrying amount of the assets (including goodwill), and liabilities of the subsidiary and any non-controlling interests. Assets of the subsidiary carried at fair value with the related cumulative gain or loss recognized in other comprehensive income, the amount previously recognized in other comprehensive income are accounted for as if the Group had directly disposed of the relevant assets (i.e. reclassified to the statement of profit or loss or transferred directly to retained earnings as specified by applicable IFRSs). The fair value of any investment retained in the former subsidiary at the date when control is lost is regarded as the fair value on initial recognition for subsequent accounting under IFRS 9 Financial Instruments: Recognition and Measurement or, when applicable, the cost on initial recognition of an investment in an associate or a jointly controlled entity.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2.3 Consolidation (continued)

2.3.5 Joint Ventures

A joint venture is a joint arrangement whereby the parties that have joint control of the arrangement have rights to the net assets of the joint arrangement. Joint control is the contractually agreed sharing of control of an arrangement, which exists only when decisions about the relevant activities require unanimous consent of the parties sharing control.

The results and assets and liabilities of joint ventures are incorporated in these consolidated financial statements using the equity method of accounting, except when the investment, or a portion thereof, is classified as held for sale, in which case it is accounted for in accordance with IFRS 5 Non-current Assets Held for Sale and Discontinued Operations. Under the equity method, an investment in a joint venture is initially recognized in the consolidated statement of financial position at cost and adjusted thereafter to recognize the Group's share of the profit or loss and other comprehensive income of a joint venture. When the Group's share of losses of a joint venture exceeds the Group's interest in that joint venture (which includes any long-term interests that, in substance, form part of the Group's net investment in the joint venture), the Group discontinues recognizing its share of further losses. Additional losses are recognized only to the extent that the Group has incurred legal or constructive obligations or made payments on behalf of a joint venture. An investment in a joint venture is accounted for using the equity method from the date on which the investee becomes a joint venture.

On acquisition of the investment in a joint venture, any excess of the cost of the investment over the Group's share of the net fair value of the identifiable assets and liabilities of the investee is recognised as goodwill, which is included within the carrying amount of the investment. Any excess of the Group's share of the net fair value of the identifiable assets and liabilities over the cost of the investment, after reassessment, is recognised immediately in profit or loss in the period in which the investment is acquired.

The requirements of IFRS 9 are applied to determine whether it is necessary to recognize any impairment loss with respect to the Group's investment in a joint venture. When necessary, the entire carrying amount of the investment (including goodwill) is tested for impairment in accordance with IAS 36 Impairment of Assets as a single asset by comparing its recoverable amount (higher of value in use and fair value less costs to sell) with its carrying amount. Any impairment loss recognized forms part of the carrying amount of the investment. Any reversal of that impairment loss is recognized in accordance with IAS 36 to the extent that the recoverable amount of the investment subsequently increases.

The Group discontinues the use of the equity method from the date when the investment ceases to be a joint venture, or when the investment is classified as held for sale. When the Group retains an interest in the former joint venture and the retained interest is a financial asset, the Group measures the retained interest at fair value at that date and the fair value is regarded as its fair value on initial recognition in accordance with IFRS 9.

The difference between the carrying amount of the joint venture at the date the equity method was discontinued, and the fair value of any retained interest and any proceeds from disposing of a part interest in the joint venture is included in the determination of the gain or loss on disposal of the joint venture. In addition, the Group accounts for all amounts previously recognised in other comprehensive income in relation to that joint venture on the same basis as would be required if that joint venture had directly disposed of the related assets or liabilities. Therefore, if a gain or loss previously recognised in other comprehensive income by that joint venture would be reclassified to profit or loss on the disposal of the related assets or liabilities, the Group reclassifies the gain or loss from equity to profit or loss (as a reclassification adjustment) when the equity method is discontinued.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2.3 Consolidation (continued)

2.3.5 Joint Ventures (continued)

When the Group reduces its ownership interest in a joint venture but the Group continues to use the equity method, the Group reclassifies to profit or loss the proportion of the gain or loss that had previously been recognised in other comprehensive income relating to that reduction in ownership interest if that gain or loss would be reclassified to profit or loss on the disposal of the related assets or liabilities.

When a group entity transacts with a joint venture of the Group, profits and losses resulting from the transactions with the joint venture are recognised in the Group's consolidated financial statements only to the extent of interests in the joint venture that are not related to the Group.

2.4 Business combinations

2.4.1 Acquisition method

Acquisitions of businesses are accounted for using the acquisition method. The cost of an acquisition is measured as the aggregate of the consideration transferred measured at acquisition date fair value and the amount of any non-controlling interests in the acquiree. For each business combination, the Group elects whether to measure the non-controlling interests in the acquiree at fair value or at the proportionate share of the acquiree's identifiable net assets. The consideration transferred in a business combination is measured at fair value, which is calculated as the sum of the acquisition-date fair values of the assets transferred by the Group, liabilities incurred by the Group to the former owners of the acquiree and the equity interests issued by the Group in exchange for control of the acquiree.

Acquisition-related costs are expensed as incurred and included in the statement of profit or loss under general and administrative expenses.

At the acquisition date, the identifiable assets acquired and the liabilities assumed are recognized at their fair value at the acquisition date, except that:

- deferred tax assets or liabilities and liabilities or assets related to employee benefit arrangements are recognized and measured in accordance with IAS 12 Income Taxes and IAS 19 Employee Benefits respectively;
- liabilities or equity instruments related to share-based payment arrangements of the acquiree or share-based payment arrangements of the Group entered into to replace share-based payment arrangements of the acquire are measured in accordance with IFRS 2 Share-based Payment at the acquisition date; And
- assets (or disposal groups) that are classified as held for sale in accordance with IFRS 5 Noncurrent Assets Held for Sale and Discontinued Operations are measured in accordance with that Standard.

2.4.2 Goodwill

Goodwill is measured as the excess of the sum of the consideration transferred, the amount of any non-controlling interests in the acquiree, and the fair value of the acquirer's previously held equity interest in the acquiree (if any) over the net of the acquisition-date amounts of the identifiable assets acquired and the liabilities assumed. If, after reassessment, the net of the acquisition-date amounts of the identifiable assets acquired and liabilities assumed exceeds the sum of the consideration transferred, the amount of any non-controlling interests in the acquiree and the fair value of the acquirer's previously held interest in the acquiree (if any), the excess is recognized immediately in the statement of profit or loss.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2.4 Business combinations (continued)

2.4.3 Contingent consideration

From January 1, 2010, when the consideration transferred by the Group in a business combination includes assets or liabilities resulting from a contingent consideration arrangement, the contingent consideration is measured at its acquisition-date fair value and included as part of the consideration transferred in a business combination. Changes in the fair value of the contingent consideration that qualify as measurement period adjustments are adjusted retrospectively, with corresponding adjustments against goodwill. Measurement period adjustments are adjustments that arise from additional information obtained during the "measurement period" (which cannot exceed one year from the acquisition date) about facts and circumstances that existed at the acquisition date.

The subsequent accounting for changes in the fair value of the contingent consideration that do not qualify as measurement period adjustments depends on how the contingent consideration is classified. Contingent consideration that is classified as equity is not remeasured at subsequent reporting dates and its subsequent settlement is accounted for within equity.

Other contingent consideration that:

- (i) is within the scope of IFRS 9 is measured at fair value at each reporting date and changes in fair value are recognised in profit or loss in accordance with that IFRS;
- (ii) is not within the scope of IFRS 9 is measured at fair value at each reporting date and changes in fair value are recognised in profit or loss.

For acquisitions before January 1, 2010, contingent consideration was recorded when its amount becomes probable and reliably measurable.

2.4.4 Business combination achieved in stages

From January 1, 2010, when a business combination is achieved in stages, the Group's previously held equity interest in the acquiree is remeasured to fair value at the acquisition date (i.e. the date when the Group obtains control) and the resulting gain or loss, if any, is recognized in the statement of profit or loss. Amounts arising from interests in the acquiree prior to the acquisition date that have previously been recognized in other comprehensive income are reclassified to the statement of profit or loss where such treatment would be appropriate if that interest were disposed of.

2.5 Foreign currency transactions

Items included in the financial statements of each entity of the Group are measured using the currency that best reflects the economic substance of the underlying events and circumstances relevant to that entity ("the functional currency"). The consolidated financial statements of the Group are presented in thousands of TL, which is the functional currency of the Bank.

Foreign currency transactions are translated into the functional currency at the exchange rates prevailing at the dates of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation of monetary assets and liabilities denominated in foreign currencies are recognized in the statement of profit or loss. Translation differences on debt securities and other monetary financial assets re-measured at fair value are included in net trading income and results from investment securities. Translation differences on non-monetary financial assets are a component of the change in their fair value and are recognized in the statement of profit or loss for equity securities held for trading, or in other comprehensive income for equity securities classified as fair value through OCI investment securities. Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rate at the date of the transaction.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

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2.5 Foreign currency transactions (continued)

Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value is determined. The gain or loss arising on translation of non-monetary items measured at fair value is treated in line with the recognition of the gain or loss on the change in fair value of the item (i.e. translation differences on items whose fair value gain or loss is recognised in OCI or profit or loss are also recognised in OCI or profit or loss, respectively).

Foreign currency translation rates used by the Group as of December 31, 2019 and 2018 are as follows:

	EUR/TL	USD / TL
December 31, 2019	6.6506	5.9402
December 31, 2018	6.0280	5.2609

2.6 Regular way purchases and sales

Regular way purchases or sales are purchases or sales of financial assets that require delivery of assets within the time frame generally established by regulation or convention in the market place. All regular way purchases and sales of financial assets are recognized on the settlement date apart from financial assets at fair value through profit or loss and investment securities and derivative instruments, which are recognized on the trade date, which is the date that the Group commits to purchase or sell the asset.

2.7 Derivative financial instruments and hedge accounting

Derivative financial instruments including foreign exchange contracts, forward rate agreements, currency and interest rate swaps, interest rate futures, currency and interest rate options (both written and purchased), credit default swaps and other derivative financial instruments are initially recognized on the statement of financial position at fair value and subsequently are re-measured at their fair value. Derivatives are presented in assets when favorable to the Group and in liabilities when unfavorable to the Group. Financial assets or liabilities at fair value through profit or loss are initially recognized and subsequently re-measured at fair value. All related realized and unrealized fair value gains and losses are included in net trading income. Interest earned or paid whilst holding financial assets or liabilities at fair value through profit or loss is reported as interest income or expense.

A derivative may be embedded in another financial instrument, known as "host contract". In such cases, the derivative instrument is separated from the host contract and treated as a separate derivative, provided that its risks and economic characteristics are not closely related to those of the host contract, the embedded derivative actually meets the definition of a derivative and the host contract is not carried at fair value with unrealized gains and losses reported in the statement of profit or loss.

Certain derivative instruments transacted as effective economic hedges under the Group's risk management positions, do not qualify for hedge accounting under the specific rules of IAS 39 and are therefore treated in the same way as derivative instruments held for trading purposes.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

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2.7 Derivative financial instruments and hedge accounting (continued)

The Group also uses derivative instruments as part of its asset and liability management activities to manage exposures to interest rate, foreign currency and credit risks, including exposures arising from forecast transactions. The Group applies fair value or cash flow hedge accounting when transactions meet the specified criteria to obtain hedge accounting treatment. The Group's criteria for a derivative instrument to be accounted for as a hedge include:

- at inception of the hedge, there is formal designation and documentation of the hedging instrument, hedged item, hedging objective, strategy and relationship;
- the hedge is documented showing that it is expected to be highly effective in offsetting the risk in the hedged item throughout the hedging period. A hedge is considered to be highly effective when the Group achieves offsetting changes in fair value between 80 percent and 125 percent for the risk being hedged;
- the hedge is highly effective on an ongoing basis; and
- for cash flow hedges, a forecast transaction that is the subject of the hedge must be highly probable and must present an exposure to variations in cash flows that could ultimately affect profit or loss.

2.7.1 Fair value hedges

For qualifying fair value hedges, the change in fair value of the hedging instrument is recognized in the statement of profit or loss along with the corresponding change in the fair value of the hedged item that is attributable to that specific hedged risk. For designated and qualifying fair value hedges, the change in the fair value of a hedging derivative is recognised in the income statement in net trading income. Meanwhile, the change in the fair value of the hedged item attributable to the risk hedged is recorded as part of the carrying value of the hedged item in the statement of financial position and is also recognised in the income statement in net trading income.

In FV hedges of fixed rate Eurobond and government bonds classified as fair value through other comprehensive income (FVOCI) financial assets, fair value changes which have already been booked in other comprehensive income (OCI) are reclassified from OCI to net trading income in profit or loss statement.

If the hedge relationship no longer meets the criteria for hedge accounting, for reasons other than the de-recognition of the hedged item, or the hedging designation is revoked, the cumulative adjustment to the carrying amount of the hedged item, is, in the case of interest bearing financial instruments, amortized to the statement of profit or loss over the remaining term of the original hedged item using a recalculated effective interest rate, or in the case of a fair value hedge of the interest rate exposure of a portfolio of financial assets or financial liabilities (and only in such a hedge), using a straight-line method. In other cases, adjustments to the hedged asset or liability arising from the application of hedge accounting are dealt with in accordance with the normal accounting treatment for that item. If the hedged item has been derecognized, e.g. sold or repaid, the unamortized fair value adjustment is recognized immediately in the statement of profit or loss.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

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2.7 Derivative financial instruments and hedge accounting (continued)

In cases where fair value hedge operations cannot be effectively performed as described in IAS 39, fair value hedge accounting is ceased. The fair value differences reflected to income statement prior to discontinuation of hedge accounting are amortized through equity until the maturity of related hedged securities. The fair value differences of related portfolio securities sold prior to maturity are immediately realized in the income statement.

2.7.2 Cash flow hedges

Fair value gains or losses associated with the effective portion of a derivative designated as a cash flow hedge are recognized initially in other comprehensive income. The ineffective portion of the gain or loss on the hedging instrument is recognised immediately in net trading income in the statement of profit or loss.

When the cash flows that the derivative is hedging (including cash flows from transactions that were only forecast when the derivative hedge was effected) materialize, resulting in income or expense, then the associated gain or loss on the hedging derivative is simultaneously transferred from other comprehensive income to corresponding income or expense line item.

If a cash flow hedge for a forecast transaction is deemed to be no longer effective, or the hedge relationship is terminated, the cumulative gain or loss on the hedging derivative previously reported in other comprehensive income is transferred to the statement of profit or loss when the committed or forecast transaction occurs. When a forecast transaction is no longer expected to occur, the cumulative gain or loss that was reported in other comprehensive income is immediately transferred to the statement of profit or loss.

2.7.3 Hedge effectiveness testing

To qualify for hedge accounting, the Group requires that at the inception of the hedge and throughout its life, each hedge must be expected to be highly effective (prospective test), and demonstrate actual effectiveness (retrospective test) on an ongoing basis.

The documentation of each hedging relationship sets out how the hedge effectiveness is assessed. The method the Group adopts for assessing hedge effectiveness will depend on its risk management strategy.

Hedge ineffectiveness is recognized in the statement of profit or loss.

2.8 Offsetting

Financial assets and liabilities are offset and the net amount reported on the statement of financial position when, and only when there is a currently enforceable legal right to offset the recognized amounts and there is an intention to realize the asset and settle the liability simultaneously or on a net basis.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

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2.9 Interest income and expenses

Interest income is recorded according to the effective interest rate method (Rate equal to net present value of future cash flows of financial assets or liabilities) defined in the IFRS 9 "Financial Instruments" standard by applying the effective interest rate to the gross carrying amount of a financial asset except for purchased or originated credit-impaired financial assets or financial assets that are not purchased or originated credit-impaired financial assets but subsequently have become credit-impaired financial assets. When applying the effective interest rate method, the Group identifies fees that are an integral part of the effective interest rate of a financial instrument. Fees that are an integral part of the effective interest rate of a financial instrument to the effective interest rate, unless the financial instrument is measured at fair value, with the change in fair value being recognized in profit or loss.

2.10 Fees and commissions

Fee and commission income 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 in accordance with IFRS 9. Other fees and commission income, including account maintenance fees, investment management fees, sales commissions, placement fees and syndication fees, are recognized as the related services are performed in accordance with IFRS 15 Revenue from contracts with customers. Other fees and commission expense relates mainly to transaction and service fees, which are expensed as the services are received.

2.11 Financial Instruments

2.11.1 Initial measurement of financial instruments

The classification of financial instruments at initial recognition depends on the contractual conditions and the relevant business model. Except for the assets in the scope of IFRS 15 Revenue from contracts with customers, at initial recognition, the Group measures financial asset or financial liabilities at fair value plus or minus, in the case of a financial asset or financial liability not at fair value through profit/loss, transaction costs that are directly attributable to the acquisition or issue of the financial asset or financial liability.

2.11.2 Classification of financial instruments

On which category a financial instruments shall be classified at initial recognition depends on both the business model for managing the financial assets and the contractual cash flow characteristics of the financial asset.

As per IFRS 9, the Group classifies a financial asset on the basis of its contractual cash flow characteristics if the financial asset is held within a business model whose objective is to hold assets to collect contractual cash flows or within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets.

The Group tested all financial assets whether their "contractual cash-flows solely represent payments of principal and interest" and assessed the asset classification within the business model. If any financial asset does not meet the "contractual cash-flows solely represent payments of principal and interest" criteria of IFRS 9 then it is classified as financial assets at fair value through profit/loss.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

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2.11 Financial Instruments (continued)

2.11.3 Assessment of business model

As per IFRS 9, the Group's business model is determined at a level that reflects how groups of financial assets are managed together to achieve a particular business objective.

The Group's business models are divided into three categories.

Business model aimed to hold assets in order to collect contractual cash flows:

This is a model whose objective is to hold assets in order to collect contractual cash flows are managed to realise cash flows by collecting contractual payments over the life of the instrument. The financial assets that are held within the scope of this business model are measured at amortized cost when the contractual terms of the financial asset meet the condition of giving rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. Cash and balances with T.R. central bank, due from banks, financial assets at amortised cost, loans and advances to customers, factoring receivables, finance lease receivables and other receivables are assessed within this business model.

Business model aimed to collect contractual cash flows and sell financial assets:

This is a model whose objective is achieved by both collecting contractual cash flows and selling financial assets: the Group may hold financial assets in a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets. Fair value change of the financial assets that are held within the scope of this business model are accounted under other comprehensive income when the contractual terms of the financial asset meet the condition of giving rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. Financial assets at fair value through other comprehensive income are assessed in this business model.

Other business models:

Financial assets are at fair value through profit or loss when they are not held within a business model whose objective is to hold assets to collect contractual cash flows or within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets. Financial assets at fair value through profit/loss are assessed in this business model.

2.11.4 Measurement categories of financial assets and liabilities

Financial assets are classified in three main categories as listed below:

- Financial assets at fair value through profit/loss;
- Financial assets at fair value through other comprehensive income; and
- Financial assets at amortized cost.

Financial Assets at Fair Value Through Profit or Loss:

Financial assets at fair value through profit/loss are financial assets other than the ones that are managed with business model that aims to hold to collect contractual cash flows or business model that aims to collect both the contractual cash flows and cash flows arising from the sale of the assets; and if the contractual terms of the financial asset do not lead to cash flows representing solely payments of principal and interest at certain date; that are either acquired for generating a profit from short-term.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2.11 Financial Instruments (continued)

fluctuations in prices or are financial assets included in a portfolio aiming to short-term profit making. Financial assets at the fair value through profit or loss are initially recognized at fair value and measured at their fair value after recognition. All gains and losses arising from these valuations are reflected in the income statement.

Interest income earned on financial asset and the difference between their acquisition costs and amortized costs are recorded as interest income in the statement of profit or loss. The differences between the amortized costs and the fair values of such assets are recorded under trading account income/losses in the statement of profit or loss. In cases where such assets are sold before their maturities, the gains/losses on such sales are recorded under trading account income/losses.

Financial assets at fair value through profit and loss, which are recognized in accordance with the Group's business model, have loans, stocks, bonds and bills.

Financial Assets at Fair Value Through Other Comprehensive Income:

Financial assets within a business model that aims to hold to collect contractual cash flows and sell, then they are classified as fair value through other comprehensive income as long as the cash flows of the financial asset are solely payments of principal and interest at certain dates. Financial assets at fair value through other comprehensive income are recognized by adding transaction cost to acquisition cost reflecting the fair value of the financial asset. After the recognition, financial assets at fair value through other comprehensive income are measured at fair value. Interest income calculated with effective interest rate method arising from financial assets at fair value through other comprehensive income and dividend income from equity securities are recorded to income statement.

"Unrealized gains and losses" arising from the difference between the amortized cost and the fair value of financial assets at fair value through other comprehensive income are not reflected in the income statement of the period until the acquisition of the asset, sale of the asset, the disposal of the asset, and impairment of the asset and are accounted under the "Other comprehensive income/expense items to be recycled to profit/loss" under shareholders' equity. Equity securities, which are classified as financial assets at fair value through other comprehensive income, that have a quoted market price in an active market and whose fair values can be reliably measured are carried at fair value. Equity securities that do not have a quoted market price in an active market and whose fair values cannot be reliably measured are carried at cost, less provision for impairment. According to IFRS 9 principles "Unrealized gains and losses" arising from equity securities are accounted under the "Other comprehensive income/expense items not be recycled to profit/loss" under shareholders' equity.

Financial Assets at Amortized Cost:

Financial assets that are held for collection of contractual cash flows where those cash flows represent solely payments of principal and interest are classified as financial assets at amortized cost. Financial assets at amortized cost are initially recognized at acquisition cost including the transaction costs which reflect the fair value of those instruments and subsequently recognized at amortized cost by using effective interest rate method. Interest income obtained from financial assets at amortized cost is accounted in income statement.

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2.12 Loans and Advances to Customers

Loans and advances to customers include non-derivative financial assets with fixed or determinable payments that are not quoted in an active market, and the Group does not intend to sell immediately or in the near term. Loans and advances to customers include those classified as loans and receivables and those measured at fair value though profit or loss.

Loans originated by the Group are recognized when cash is advanced to borrowers. Loans and advances to customers are initially recorded at fair value, which is usually the net amount disbursed at inception including directly attributable origination costs and certain types of fees or commission (syndication commission, commitment fees and handling charges) that are regarded as an adjustment to the effective interest rate of the loan, and are subsequently measured at amortized cost using the effective interest rate method, unless they are measured at "fair value through profit or loss" or "fair value through other comprehensive income" (see Note 2.11.4).

2.12.1 Explanations on write-off policy

The Parent Bank's general policy for write-offs of loans and receivables under follow-up is to write of such loans and receivables that are proven to be uncollectible in legal follow-up process.

2.13 Explanations on Expected Credit Losses

Beginning from January 1, 2018, the Group recognizes a loss allowance for expected credit losses on financial assets and loans measured at amortized cost, financial assets at fair value through other comprehensive income, loan commitments and financial guarantee contracts not measured at fair value through profit/loss based on IFRS 9. At each reporting date, the Group shall assess whether the credit risk on a financial instrument has increased significantly since initial recognition. The Group considers the changes in the default risk of financial instrument, when making the assessment.

The expected credit loss estimates are required to be unbiased, probability-weighted and include supportable information about past events, current conditions, and forecasts of future economic conditions. These financial assets are divided into three categories depending on increase in credit risk observed since their initial recognition:

Stage 1:

For the financial assets at initial recognition or that do not have a significant increase in credit risk since initial recognition. Impairment for credit risk is recorded in the amount of expected credit losses on the 12-month default risk. It is calculated 12-month expected credit loss based on a probability of default realized within 12 months after the reporting date. Such expected 12-month probability of default is applied on an expected exposure at default, multiplied with loss given default rate and discounted with the original effective interest rate.

Stage 2:

As of the reporting date of the financial asset, in the event of a significant increase in credit risk since initial recognition, the financial asset is transferred to Stage 2. Impairment for credit risk is determined on the basis of the instrument's lifetime expected credit losses. Calculation approach is quite similar with approach mentioned above, but probability of default and loss amount in default ratios estimated for the lifetime of instruments.

Stage 3:

Financial assets considered as impaired at the reporting date are classified as stage 3. The probability of default is taken into account as 100% in the calculation of impairment provision and Group accounts lifetime expected credit losses. In determining the impairment, the Group takes into consideration the following criteria:

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2.13 Explanations on Expected Credit Losses (continued)

- Delay of over 90 days;
- Impairment of credit worthiness;
- Collateral and / or equity of debtor is inadequate cover the payment of receivables on the maturity; and
- If it is convinced that will be delayed by more than 90 days for recovery of receivables due to macroeconomic, sector-specific or customer-specific reasons.

2.13.1 Calculation of expected credit losses

The Bank measured expected credit losses with the reasonable, objective and supportable information based on a probability-weighted including estimations about time value of money, past events, current conditions and future economic conditions as of the reporting date, without undue cost or effort. The calculation of expected credit losses consists of three main parameters: probability of default (PD), loss given default (LGD) and exposure at default (EAD). PDs and LGDs used in the ECL calculation are point in time ("PIT") - based for key portfolios and consider both current conditions and expected cyclical changes.

While the expected credit loss is estimated, three scenarios (baseline scenario, adverse scenario, New Economic Plan) are evaluated. Each of these scenarios was associated with the different PD and LGD.

In addition, a certain portion of commercial and corporate loans is assessed individually in accordance with the internal policies in the calculation of the expected credit losses based on IFRS 9. Such calculations are made by discounting the expected cash flows from the individual financial instrument to its present value using the effective interest rate.

When measuring expected credit losses, it shall be considered the risk or probability that a credit loss occurs by reflecting the possibility that a credit loss occurs and the possibility that no credit loss occurs, even if the possibility of a credit loss occurring is very low. Such assessment is made by reflecting the estimate of expected credit loss which is unbiased and probability-weighted determined by evaluating a range of possible outcomes.

2.13.2 Probability of Default ("PD")

The PD represents the likelihood of a default over a specified time period. A 12-month PD represents the likelihood of default determined for the next 12 months and a lifetime PD represents the probability of default over the remaining lifetime of the instrument. The lifetime PD calculation is based on a series of 12-month PIT PDs that are derived from through the cycle (TTC) PDs and scenario forecasts.

It is used internal rating systems for both retail and commercial portfolios to measure risk level. The internal rating models used for the commercial portfolio include customer financial information and qualitative survey responses. Whereas behavioral and application scorecards used in the retail portfolio include; the behavioral data of the customer and the product in the Bank, the demographic information of the customer, and the behavioral data of the customer in the sector. Probability of default calculation has been carried out based on past information, current conditions and forward looking macroeconomic parameters.

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2.13 Explanations on Expected Credit Losses (continued)

2.13.3 Loss Given Default ("LGD")

The LGD represents an estimate of the economic loss at the time of a potential default occurring during the life of a financial instrument. The LGD is calculated taking into account expected future cash flows from collateral and other credit enhancements by considering time value of money.

LGD calculations are performed using historical data which best reflects current conditions, by formation of segments based on certain risk factors that are deemed important for each portfolio and inclusion of forward-looking information and macroeconomic expectations. LGD summarizes all cash flows from customers subsequent to default. It covers all costs and collections that occur during the collection cycle, including collections from collaterals. It also includes the "time value of money"

calculated by means of deducting costs and additional losses from the present value of collections. The Bank bases its estimates on models for collateralized portfolios and on previous experience for unsecured parties, except for corporate loans that are assigned by the Basel Committee individually or as designated by the Basel Committee.

2.13.4 Exposure at Default ("EAD")

The EAD represents an estimate of the exposure to credit risk at the time of a potential default occurring during the life of a financial instrument. It represents the cash flows outstanding at the time of default, considering expected repayments, interest payments and accruals, discounted at the effective interest rate. Future drawdowns on facilities are considered through a credit conversion factor (CCF) that is reflective of historical drawdown and default patterns and the characteristics of the respective portfolios. While the expected credit loss is estimated, three scenarios (baseline scenario, adverse scenario, New Economic Plan) are evaluated. Each of these scenarios was associated with the probability of different default and loss in default.

2.13.5 Consideration of the Macroeconomic Factors

Loss given default and probability of default parameters are determined by considering macroeconomic factors. The macroeconomic variables used in the calculation of the expected loss are as follows:

- Five year credit risk of Turkey;
- Real GDP growth;
- Unemployment rate;
- European Region inflation rate
- Five year government bond interest rate of Turkey.

Stages were determined through the models created using internal information for the Bank, the simplified method has been applied for other financial institutions.

2.13.6 Calculating the Expected Loss Period

Lifetime ECL is calculated by taking into account maturity extensions, repayment options and the period during which the Bank will be exposed to credit risk. The time in financial guarantees and other irrevocable commitments represents the credit maturity for which the liabilities of the Bank. Behavioral maturity analysis has been performed on credit cards and overdraft accounts. With the exception of credit cards and other revolving facilities, the maximum period for which the credit losses are determined is the contractual life of a financial instrument unless there is the legal right to call it earlier.

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2.13 Explanations on Expected Credit Losses (continued)

2.13.7 Significant increase in credit risk

The Bank makes qualitative and quantitative assessments regarding assessment of significant increase in credit risk of financial assets to be classified as stage 2 (Significant Increase in Credit Risk).

Within the scope of quantitative assessment, the quantitative reason explaining the significant increase in the credit risk is based on a comparison of the probability of default calculated at the origination of the loan and the probability of default assigned for the same loan as of the reporting date. If there is a significant deterioration in PD, it is considered that there is a significant increase in credit risk and the financial asset is classified as stage 2. In this context, the Group has calculated thresholds at which point the relative change is a significant deterioration. In the quantitative evaluation of the significant increase in credit risk, the Bank considers the absolute thresholds as well as the relative thresholds as an additional layer. Receivables below the absolute threshold value of default are not included in the relative threshold value comparison.

The Group classifies the financial asset as Stage 2 (Significant Increase in Credit Risk) where any of the following conditions are satisfied as a result of a qualitative assessment:

- Loans overdue more than 30 days as of the reporting date;
- Loans classified as watch-list of the Bank; and
- When there is a change in the payment plan due to restructuring.

2.13.8 Reconciliation of statement of financial position balances as at the transition of IFRS 9

-	Book Value Before IFRS 9 December 31,		Re-	IFRS 9 book value January 1,	Tax	Equity
Financial Assets	2017	Reclassifications	measurements	2018	Effect	Effect
Amortized cost						
Pre-classification balance (Held to Maturity)	7,168,664	-	-	-	-	-
Classified from at Fair Value through Other						
Comprehensive Income	-	1,720,595	99,484	-	(21,888)	77,596
Classified as at Fair Value through Other						
Comprehensive Income	-	(42,573)	-	-	-	-
Post-classification book value	-	-	-	8,946,170	-	
Fair Value through Other Comprehensive						
Income						
Pre-classification balance (Available to Sale)	8,353,636	-	-	-	-	-
Classified as Held-to-Maturity	-	42,573	2,872	-	(632)	2,240
Classified to Held-to-Maturity	-	(1,720,595)	-	-	-	-
Post-classification book value	-	-	-	6,678,486	-	-
Expected loss provision(*)	-	-	11,124	-	(2,447)	8,677
Loans and Other Receivables at Amortized						
Cost (Gross)						
Pre-classification value at Amortized Cost	82,113,497	-	-	-	-	-
Financial Assets at Fair Value through						
Profit/Loss	-	-	-	-	-	-
Classified to at Amortized Cost	-	-	-	-	-	-
Classified from at Fair Value through Profit/Loss	-	-	-	-	-	-
Post-classification value at Amortized cost	-	-	-	-	-	-
Post-classification value at Fair Value through						
Profit/Loss	-	-	-	-	-	-
Expected loss provision	(3,944,032)	-	(1,548,334)	(5,492,366)	340,633	(1,207,701)
Factoring Receivables						
Expected loss provision	(41,793)	-	(9,327)	(51,120)	2,052	(7,275)
Finance Lease Receivables						
Expected loss provision	(81,869)	-	(49,029)	(130,898)	10,786	(38,243)
Other Financial Assets						
Expected loss provision(**)	-	-	(40,483)	(40,483)	8,909	(31,574)
Non-Cash Loans				· · · · · · · · · · · · · · · · · · ·		
Expected loss provision	(46,366)	<u>-</u>	(176,520)	(222,886)	38,834	(137,686)

 $[\]ensuremath{^{(*)}}$ There is no net equity impact due to retained earnings reclassification.

^(**) Expected loss provision includes amounts related to cash and balances with central banks, due from banks and other receivables assets.

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2.13 Explanations on Expected Credit Losses (continued)

Effects on equity with IFRS 9 transition:

The amounting to TL 1,823,693 difference which is an expense between the provision for impairment of the previous period of the Group and the provision for loss that is measured in accordance with IFRS 9 impairment model as of January 1, 2018 is classified as "Reserves and retained earnings" in shareholders' equity.

Deferred tax assets amounting to TL 425,138 and corporate tax loss amounting to TL 46,444 which have been cancelled due to IFRS 9 transition, have been reflected to the opening financials of January 1, 2018 and the related amount has been classified under "Reserves and retained earnings" in shareholders' equity.

Before January 1, 2018 securities which was classified as fair value through OCI is now classified as amortized cost with the adoption of IFRS 9 is TL 1,720,595 and securities which was classified as amortized cost is now classified as fair value through OCI with the adoption of IFRS 9 is TL 42,573.

Net after tax re-measurement differences of these securities amounting to TL 79,837 and the expected loss reserve amounting to TL 8,677 for FVOCI investment securities are classified under "Unrealized gain on FVOCI Investment".

2.14 Sale and repurchase agreements

The Group enters into sales of securities under agreements to repurchase such securities. Such securities, which have been sold subject to repurchase agreements ('repos'), continue to be recognized on the statement of financial position and are measured in accordance with the accounting policy of the security portfolio which they are part of. The counterparty liability for amounts received under these agreements is included within securities sold under agreements to repurchase in due to other banks or customer deposits, as appropriate. The difference between sale and repurchase price is treated as interest expense and accrued over the life of the repurchase agreements using effective interest method.

Securities purchased with a corresponding commitment to resell at a fixed rate at a specified future date ('reverse repos') are not recognized on the statement of financial position, as the Group does not obtain control over the assets. Amounts paid under these agreements are included in due from banks. The difference between purchase and resale price is treated as interest income and accrued over the life of the reverse repurchase agreement using effective interest method.

2.15 Securities borrowing and lending

Securities lending and borrowing transactions are usually collateralised by securities or cash. The transfer of the securities to counterparties is only reflected on the statement of financial position if the risks and rewards of ownership are also transferred. Cash advanced or received as collateral is recorded as an asset or liability.

Securities borrowed are not recognised on the statement of financial position, unless they are then sold to third parties, in which case the obligation to return the securities is recorded as a trading liability and measured at fair value with any gains or losses included in net trading income.

Respectively, securities lent and securities provided as collateral under securities borrowing transactions are not derecognized from the financial statements unless control of the contractual rights that comprise these securities transferred is relinquished.

The Group monitors the market value of the securities borrowed and lent on a regular basis and provides or requests additional collateral in accordance with the underlying agreements. Fees and interest received or paid are recorded as interest income or interest expense, on an accrual basis.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

2.16 Financial liabilities and equity

Financial liabilities and equity instruments issued by the Group are classified according to the substance of the contractual arrangements entered into and the definitions of a financial liability and an equity instrument. An equity instrument is any contract that evidences a residual interest in the assets of the Group after deducting all of its liabilities.

Financial liabilities are classified as either financial liabilities at fair value through profit or loss or other financial liabilities.

Other financial liabilities, including borrowings, are initially measured at fair value, net of transaction costs and subsequently measured at amortized cost using the effective interest method, with interest expense recognized using the effective interest method. The effective interest method is a method of calculating the amortized cost of a financial liability and of allocating interest expense over the relevant period. The effective interest rate is the rate that exactly discounts estimated future cash payments through the expected life of the financial liability, or where appropriate, a shorter period to the net carrying amount on initial recognition.

2.17 Derecognition

2.17.1 Financial assets

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

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

When the Group has transferred its rights to receive cash flows from an asset and has neither transferred nor retained substantially all the risks and rewards of the asset nor transferred control of the asset, the asset is recognized to the extent of the Group's continuing involvement in the asset. Continuing involvement that takes the form of a guarantee over the transferred asset is measured at the lower of the original carrying amount of the asset and the maximum amount of consideration that the Group could be required to repay.

2.17.2 Financial liabilities

A financial liability is derecognized when the obligation under the liability is discharged, cancelled or expired. When 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 recognized in the statement of profit or loss.

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2.18 Fair value of financial instruments

The Group measures the fair value of its financial instruments based on a framework for measuring fair value that categorizes financial instruments based on a three-level hierarchy of the inputs to the valuation technique, as discussed below.

Level 1: Quoted prices in active markets for identical assets or liabilities. Level 1 assets and liabilities include debt and equity securities and derivative contracts that are traded in an active exchange market.

Level 2: Observable inputs other than Level 1 quoted prices, such as quoted prices for similar assets or liabilities, quoted prices in markets that are not active, or other inputs that are observable or can be corroborated by observable market data (for example derived from prices) for substantially the full term of the assets or liabilities. Level 2 assets and liabilities include debt securities with quoted prices that are traded less frequently than exchange-traded instruments, as well as debt securities without quoted prices and certain derivative contracts whose values are determined using pricing models, discounted cash flow methodologies, or similar techniques with inputs that are observable in the market or can be derived principally from or corroborated by observable market data. This category generally includes government and corporate debt securities with prices in markets that are not active and certain OTC derivative contracts.

Level 3: Unobservable inputs that are supported by little or no market activity and that are significant to the fair value of the assets or liabilities. If a fair value measurement uses observable inputs that require significant adjustment based on unobservable inputs, that measurement is a Level 3 measurement.

The level in the fair value hierarchy within which the fair value measurement is categorized in its entirety is determined on the basis of the lowest level input that is significant to the fair value measurement in its entirety. For this purpose, the significance of an input is assessed against the fair value measurement in its entirety.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

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2.19 Property and equipment

Property and equipment include land and buildings, leasehold improvements and transportation and other equipment, held by the Group for use in the supply of services or for administrative purposes. Property and equipment are initially recorded at cost, which includes all costs that are required to bring an asset into operating condition. Subsequent to initial recognition, property and equipment are measured at cost less accumulated depreciation and accumulated impairment losses. Costs incurred subsequent to the acquisition of an asset, which is classified as property and equipment are capitalised, only when it is probable that they will result in future economic benefits to the Group beyond those originally anticipated for the asset, otherwise they are expensed as incurred.

Depreciation of an item of property and equipment begins when it is available for use and ceases only when the asset is derecognized. Therefore, the depreciation of an item of property and equipment that is retired from active use does not cease unless it is fully depreciated, but its useful life is reassessed. Depreciation on property and equipment is calculated using the straight-line method over their estimated useful lives as follows:

Land No depreciation
Buildings and land improvements Up to 50 years
Furniture and fixtures 5-12 years
Machinery and equipment 4-5 years
Vehicles 4-7 years
Leasehold improvements Over the term of respective leases

Expenses for repairs and maintenance are charged to expenses as incurred.

The residual values, useful lives and depreciation methods are reviewed, and adjusted if appropriate, at each financial year-end.

At each reporting date the Group assesses whether there is any indication that an item of property and equipment may be impaired. If any such indication exists, the Group estimates the recoverable amount of the asset. Where the carrying values exceed the estimated recoverable amount, the assets are written down to their recoverable amount. The recoverable amount of property and equipment is the greater of the fair value less costs to sell and value in use. Impairment losses are recognized in the statement of profit or loss.

An item of property and equipment is derecognized upon disposal or when no future economic benefits are expected from its use. Any gain or loss arising on derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in the statement of profit or loss in the year the asset is derecognized.

Foreclosed assets, which consist mainly of properties acquired through foreclosure in full or partial satisfaction of a related loan, are initially measured at fair value less estimated costs to sell, which includes transaction costs, and reported under other assets. After initial recognition foreclosed assets are re-measured at the lower of their carrying amount and fair value less estimated costs to sell.

Subsequent gains may be recognized up to the amount of previous write-downs. Any gains or losses on liquidation or re-measurement of foreclosed assets are included in other operating income/ (expenses).

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2.20 Intangible assets

Intangible assets include goodwill, purchased software and internally generated software.

Goodwill

Subsequent to initial recognition, goodwill is stated at cost, as established at the date of acquisition (see Note 29) less accumulated impairment losses. Goodwill is allocated to cash-generating units ("CGUs") for the purpose of impairment testing. The allocation is made to those cash-generating units that are expected to benefit from the business combination in which the goodwill arose.

The Group assesses goodwill for possible impairment annually or more frequently if there are indications for impairment. The assessment involves estimating whether the carrying amount of the goodwill remains fully recoverable. When making this assessment the Group compares the carrying value of the CGU to which the goodwill is allocated to its recoverable amount, which is the higher of fair value less cost to sell and value in use. Fair value is estimated by reference to market value, if available, or is determined by a qualified evaluator or pricing model. Determination of a fair value and value in use requires management to make assumptions and use estimates. If the recoverable amount is less than the carrying amount, an irreversible impairment loss is recognized, and the goodwill is written down by the excess of the carrying amount of the unit over its recoverable amount.

Internally generated software

The amount initially recognized for internally generated software is the total expenditure incurred from the date when the internally generated software first meets the recognition criteria. Where no internally generated software can be recognized, development expenditure is charged to the statement of profit or loss in the period in which it is incurred.

Research costs are expensed as incurred. An internally generated software arising from development expenditure incurred on an individual project is recognized only when the Group can demonstrate:

- the technical feasibility of completing the internally generated software so that it will be available for use:
- its intention to complete and use the asset;
- the ability to use the asset;
- how the asset will generate future economic benefits;
- the ability of adequate technical, financial and other resources to complete the development and use the asset; and
- the ability to measure reliably the expenditure during development.

Following the initial recognition of the development expenditure, the cost model is applied requiring the asset to be carried at cost less any accumulated amortization and impairment losses.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

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2.20 Intangible assets (continued)

Purchased software

Software includes costs that are directly associated with identifiable and unique software products controlled by the Group that are anticipated to generate future economic benefits exceeding costs beyond one year. Expenditure, which enhances or extends the performance of computer software programs beyond their original specifications is recognized as a capital improvement and added to the original cost of software. Following initial recognition intangible assets are carried at cost less any accumulated amortization and any impairment losses.

Measurement

Software costs recognized as assets are amortized using the straight-line method over their useful lives, for internal generated software the useful life is 5 years whereas for purchased software the useful life is 3 years.

The carrying value of intangible assets is reviewed for impairment annually or more frequently when an indication of impairment arises during the reporting year.

Gains or losses arising from derecognition of an intangible asset are measured as the difference between the net disposal proceeds and the carrying amount of the asset and are recognized in the statement of profit or loss when the asset is derecognized.

2.21 Leases

The determination of whether an arrangement is or contains a lease is based on the substance of the arrangement. It requires an assessment of whether: (a) fulfillment of the arrangement is dependent on the use of a specific asset or assets (the asset); and (b) the arrangement conveys a right to use the asset.

2.21.1 The Group as a lessee

<u>Finance leases</u>: Leases where the Group has substantially all the risks and rewards of ownership of the asset are classified as finance leases. Finance leases are capitalized at the inception of the lease at the lower of the fair value of the leased property or the present value of the minimum lease payments.

Each lease payment is allocated between the liability and finance charges so as to achieve a constant rate on the finance balance outstanding. The outstanding rental obligations, net of finance charges, are included in other liabilities. The interest element of the finance cost is charged to the statement of profit or loss over the lease period. All assets acquired under finance leases are depreciated over the shorter of the useful life of the asset or the lease term.

Operating leases: Group; It records the lease payments made in accordance with the operating lease agreements in equal amounts during the lease period. The Bank has operating lease agreements for some branches and ATM machines. The lease agreements are amortized during the lease period by measuring the lease obligation at the present value of the lease payments (lease obligation) that has not been paid at that date and by recording the relevant usage right as of the same date. Lease payments are discounted using this rate if the implicit interest rate in the lease can be easily determined. If the tenant cannot easily determine this rate, he uses the alternative borrowing interest rate. The tenant separately records the interest expense on the rental obligation and the depreciation expense of the right to use asset.

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2.21 Leases (continued)

2.21.2 The Group as a lessor

<u>Finance leases</u>: When assets are leased out under a finance lease, the present value of the minimum lease payments is recognized as a receivable. Lease income is recognized over the term of the lease using the net investment method (before tax), which reflects a constant periodic rate of return. Finance leases are presented in finance lease receivables.

Impairment losses on finance lease receivables

The Group assesses expected losses at each reporting date according to IFRS 9 guidance in a similar way to the loans and advances to customers as described in 2.13.

Operating leases: Assets leased out under operating leases are included in the statement of financial position based on the nature of the asset. They are depreciated over their useful lives on a basis consistent with similar owned property. Rental income (net of any incentives given to lessees) is recognized on a straight-line basis over the lease term.

2.22 Factoring receivables

Factoring receivables are measured at amortized cost using the effective interest rate method after deducting unearned interest income and when specific provisions for impairment are provided under IFRS 9 requirements.

2.23 Cash and cash equivalents

For the purposes of the cash flow statement, cash and cash equivalents include cash on hand, unrestricted balances held with central banks, amounts due from other banks and highly liquid financial assets with original maturities of less than three months from the date of acquisition such as treasury bills and other eligible bills, investment and trading securities which are subject to insignificant risk of changes to fair value and are used by the Group in the management of its short-term commitments.

2.24 Provisions

Provisions are recognized when the Group has a present legal or constructive obligation as a result of past events, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate of the amount of the obligation can be made. Where the Group expects some or all of a provision to be reimbursed, for example under an insurance contract, the reimbursement is recognized as a separate asset but only when the reimbursement is virtually certain. The expense relating to any provision is presented in the statement of profit or loss net of any reimbursement recognized.

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2.25 Financial guarantee contracts

A financial guarantee contract is a contract that requires the issuer to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make payment when due in accordance with the original or modified terms of a debt instrument. A financial guarantee contract, other than those assessed as insurance contracts, is recognized initially at their fair value and subsequently measured at the higher of: (a) the unamortized balance of the related fees received and deferred, and (b) the best estimate of the amount required to settle the guarantee at the reporting date.

2.26 Employee benefits

The Group has defined benefit plans as described below:

A defined benefit plan is a post-employment benefit plan that defines an amount of benefit to be provided, usually as a function of one or more factors such as age, years of service or compensation. For defined benefit plans, the liability is the present value of the defined benefit obligation as at the reporting date minus the fair value of the plan assets (if any), including any adjustments for unrecognized actuarial gains/losses and past service cost.

In accordance with existing Turkish Labor Law, the Group is required to make lump-sum severance indemnities to each employee who has completed over one year of service with the Group and whose employment is terminated due to retirement or for reasons other than resignation or misconduct.

The Group has reflected the retirement pay liability amount, which was calculated by an independent actuary, using the projected unit credit method in the accompanying financial statements.

Remeasurements, comprising of actuarial gains and losses, are recognised immediately in the statement of financial position with a corresponding debit or credit to retained earnings through OCI in the period in which they occur. Remeasurements are not reclassified to profit or loss in subsequent periods.

Past service costs are recognised in profit or loss on the earlier of:

- The date of the plan amendment or curtailment; and
- The date that the Group recognises related restructuring costs.

Net interest is calculated by applying the discount rate to the net defined benefit liability or asset. Net interest expense and service costs related to the defined benefit plans are recognized in personnel expenses in the statement of profit or loss.

Short-term emloyee benefits - The Group provided for undiscounted short-term employee benefits earned during the financial periods as per services rendered in compliance with IAS 19, "Employee Benefits".

Defined contribution plans - The Group has to pay contributions to the Social Security Institution on a mandatory basis. The Group has no further payment obligations once the contributions have been paid. These contributions are recognized as an employee benefit expense when they are accrued.

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2.27 Income taxes

Tax charge (benefit) is the aggregate amount included in the determination of net profit or loss for the period in respect of current and deferred taxes.

a. Current tax

The tax currently payable is based on taxable profit for the year. Taxable profit differs from profit as reported in the statement of profit or loss because it excludes items of income or expense that are taxable or deductible in other years and it further excludes items that are never taxable or deductible. The Group's liability for current tax is calculated using tax rates that have been enacted or substantively enacted by the reporting date. In accordance with the Corporate Tax Law No. 5520 published in the Official Gazette No: 26205 dated June 21, 2006, statutory income is subject to corporate tax at 20%. However, according to temporary article 10 added to the Corporate Income Tax Law, the rate of 20% shall be applied as 22% for the corporate earnings of the taxation periods of the companies in 2018, 2019 and 2020 (accounting periods starting within the relevant year for companies appointed for the special accounting period).

b. Deferred tax

Deferred tax is fully provided, using the liability method, on all temporary differences at the reporting date between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes. Deferred tax assets are recognized for all deductible temporary differences, carry-forward of unused tax credits and unused tax losses, to the extent that it is probable that taxable profit will be available against which the deductible temporary differences, carry-forward of unused tax credits and unused tax losses can be utilized. Deferred tax liabilities are recognized for all taxable temporary differences.

The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that, in the management's judgment, it is no longer probable that sufficient taxable profit will be available to allow all or part of the deferred tax asset to be utilized. Unrecognized deferred tax assets are reassessed at each reporting date and are recognized to the extent it has become probable that future taxable profit will allow the deferred tax assets to be recovered.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply to the period when the asset is realized or the liability is settled, based on tax rates (and tax laws) that have been enacted or substantially enacted at the reporting date. Since the applicable tax rate has been changed to 22% for the 3 years beginning from January 1, 2018, 22% tax rate is used in the deferred tax calculation of December 31, 2019 for the temporary differences expected to be realized/closed within 2 years (for the years 2019 and 2020). However, since the corporate tax rate after 2020 is 20%, 20% tax rate is used for the temporary differences expected to be realized/closed after 2020.

Such assets and liabilities are not recognised if the temporary difference arises from the initial recognition of goodwill or from the initial recognition (other than in a business combination) of other assets and liabilities in a transaction that affects neither the taxable profit nor the accounting profit.

Deferred tax liabilities are recognised for taxable temporary differences arising on investments in subsidiaries and associates, and interests in joint ventures, except where the group is able to control the reversal of the temporary difference and it is probable that the temporary difference will not reverse in the foreseeable future.

Deferred tax relating to items which are recognized in other comprehensive income is also recognized in other comprehensive income. Such deferred tax is subsequently recognized in the statement of profit or loss together with the deferred gain or loss. Deferred tax assets and deferred tax liabilities are offset, if a legally enforceable right exists to set off current tax assets against current tax liabilities, and deferred taxes relate to the same taxable entity and the same taxation authority.

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2.28 Interest bearing deposits and borrowings

All deposits and borrowings are initially recognized at the fair value of consideration received less directly attributable transaction costs. Interest-bearing deposits and borrowings are subsequently measured at amortized cost using the effective interest method. Gains or losses are recognized in the statement of profit or loss when the liabilities are derecognized as well as through the amortization process.

2.29 Dividends

Dividends on ordinary shares are recognized as a liability in the period in which they are approved by the Annual General Meeting of the Shareholders of the Bank and its subsidiaries.

2.30 Segment reporting

Operating segments are reported in a manner consistent with the internal reporting provided to the chief operating decision-maker. The chief operating decision-maker is the person or group that allocates resources to and assesses the performance of the operating segments of an entity. The Group has determined the Board of Directors as its chief operating decision makers.

All transactions between business segments are conducted on an arm's length basis, with inter-segment revenue and costs being eliminated. Income and expenses directly associated with each segment are included in determining business segment performance.

2.31 Related party transactions

Related parties include entities, which the Group has the ability to exercise significant influence in making financial and operating decisions. Related parties include, directors, shareholders, close members of their families, companies owned or controlled by them and companies over which they can influence the financial and operating policies.

2.32 Fiduciary and trust activities

The Group provides fiduciary and trust services to individuals and other institutions, whereby it holds and manages assets or invests funds received in various financial instruments at the direction of the customer. The Group receives fee income for providing these services. Trust assets held by the Group in a fiduciary, agency or custodian capacity for its customers are not recognized in the financial statements, since such items are not as assets of the Group. The Group is not exposed to any credit risk relating to such placements, as it does not guarantee these investments.

2.33 Earnings per share

The basic earnings per share (EPS) ratio is calculated by dividing the net profit or loss for the period attributable to ordinary shareholders of the Bank by the weighted average number of ordinary shares outstanding during the period.

The diluted earnings per share ratio is computed using the same method as for basic EPS, but the determinants are adjusted to reflect the potential dilution that could occur if convertible debt securities, options, warrants or other contracts to issue ordinary shares were converted or exercised into ordinary shares.

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3 Critical judgments and estimates

The preparation of financial statements in accordance with IFRS requires management to make judgments, estimates and assumptions that affect the reported amount of assets, liabilities, income and expenses in the consolidated financial statements. The Group believes that the judgments, estimates and assumptions used in the preparation of the financial statements are appropriate given the factual circumstances as of December 31, 2019.

The Group's management has made an assessment of its ability to continue as a going concern and is satisfied that it has the resources to continue in business for the foreseeable future. Furthermore, management is not aware of any material uncertainties that may cast significant doubt on the Group's ability to continue as a going concern. Therefore, the financial statements continue to be prepared on the going concern basis.

The most significant areas, for which judgments, estimates and assumptions are required in applying the Group's accounting policies, are the following:

3.1 Expected credit losses for loans and advances to customers, finance lease and factoring receivables

The amount of the allowance for impairment of loans and advances to customers, finance lease receivables and factoring receivables is based upon IFRS 9 principles as described in Note 2.13.

Applying this methodology requires management to make estimates regarding the amount and timing of the cash flows, which are expected to be received. In estimating these cash flows, management makes judgments about the counterparty's financial situation and the net realizable value of any underlying collateral or guarantees in favor of the Group. Each impaired asset is assessed on its merits, and the workout strategy and estimate of cash flows considered recoverable are independently reviewed.

In assessing the need for expected credit loss allowances, management considers factors such as time value of money, past events, current conditions and future economic conditions as of the reporting date. In order to estimate the required allowance, assumptions are made both to define the way inherent losses are modeled and to determine the required input parameters, based on historical experience and current economic conditions. The accuracy of the allowances and provisions depends on the model assumptions and parameters used in determining loss allowances. In addition, a certain portion of commercial and corporate loans is assessed individually in accordance with the internal policies in the calculation of the expected credit losses based on IFRS 9. While this necessarily involves judgment, management believes that the allowances and provisions are reasonable and supportable.

The amount of the allowance for impairment of loans and advances to customers, finance lease receivables and factoring receivables are described in Note 23,25,24.

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3 Critical judgments and estimates (continued)

3.1 Fair value of financial instruments

The fair values of financial instruments that are not quoted in active markets are determined by using valuation techniques. These include present value methods and other models based mainly on observable input parameters and to a small extent to non-observable input parameters.

All valuation models are validated before they are used as a basis for financial reporting, and periodically reviewed thereafter, by qualified personnel independent of the area that created the model.

The Group applies the models consistently from one period to the next, ensuring comparability and continuity of valuations over time, but estimating fair value inherently involves a significant degree of judgment. Management therefore establishes valuation adjustments to cover the risk associated with the estimation of unobservable input parameters and the assumptions within the models themselves.

Although a significant degree of judgment is, in some cases, required in establishing fair values, management believes the fair values recorded in the statement of financial position and the changes in fair value recorded in the statement of profit or loss are prudent and reflective of the underlying economics, based on the controls and procedural safeguards employed.

4 Other Matters

None.

5 Financial risk management

5.1 Financial risk management

The Group's Risk Management Department is responsible for monitoring and managing all potential risks for the Group in a centralized and efficiently coordinated manner. The primary goal of the Group's Risk Management Department is to provide business lines with appropriate capital allocation (economic capital) for risks they are exposed to.

The Group aims to adopt practices regarding risk management governance, taking into account all relevant guidelines and regulatory requirements, as set by the Basel Committee, BRSA and the Capital Markets Board ("CMB"), as well as any decisions of the competent authorities supervising the Group entities.

Risk management governance at the Group starts with the Board of Directors. The Board Risk Committee ("BRC"), Asset Liability Committee ("ALCO"), Corporate and Retail Credit Policy Committee ("CPC"), Operational Risk Committee ("ORC") and the Risk Management Department are the important bodies of the risk management structure. The Board of Directors determines the general risk policy and the risk appetite of the Bank. The BRC defines risk policies and strategies, reviews the types of risks the Bank is exposed to in its monthly meetings, monitors the implementation of the risk management strategies and brings the important risk issues to the attention of the Board. The ALCO, meeting bi-weekly, is responsible for monitoring and managing the structural asset liability mismatches of the Bank, as well as monitoring and controlling liquidity risk and foreign currency exchange risk. The CPC meets monthly and is responsible for monitoring and evaluating the Bank's lending portfolio and determining principles and policies regarding the credit risk management processes such as loan approval, limit setting, rating, monitoring and problem management. The ORC meets every three months and is responsible for reviewing operational risk issues of the Bank and defining the necessary actions to be taken to minimize these risks.

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5 Financial risk management (continued)

The Risk Management Department, working independently from the executive functions and reporting to the Board of Directors, is organized under four groups as market risk, credit risk, operational risk and model validation, each having responsibility for identifying, measuring, monitoring, controlling and managing the relevant risks as well as for model validation, assessing the predictive ability of risk estimates and the use of ratings in credit processes.

The Internal Audit Division, which reports directly to the Board of Directors through the Audit Committee, complements the risk management framework and acts as an independent reviewer, focusing on the effectiveness of the risk management framework and control environment.

5.1.1 Board Risk Committee

The Group's risk management policies are approved by the BRC, the members of which are the Chairman of the Board of Directors, and three members of the Board of Directors. According to its internal regulation, the BRC is responsible for all strategic risk management decisions including, for example, the approval and review of risk strategy, policies and capital adequacy and allocation as well as oversight of the CPC and the ORC.

5.1.2 Group Risk Management Department

The department seeks to protect the Group against unforeseen losses and to maintain earnings stability through the independent identification and assessment of risks. It uses a framework for evaluating risks as the basis for organizing the Group structure. Its role in maximizing the Bank's earnings potential involves measuring performance on a risk-adjusted basis and allocating capital accordingly.

In addition, it is responsible for providing the BRC and the Executive Committee with data and analysis required for measuring, monitoring and managing risks and for supporting the implementation of risk management decisions. Group risk management policies are approved by the BRC.

The department undertakes to do the following:

- Analyze, measure, monitor, control, mitigate and report to management all significant onand off-balance sheet risks undertaken at the Bank and the Group level;
- Adopt risk management policies with regard to significant credit, market, operational and other risks undertaken by the Bank and the Group;
- Evaluate the internal capital that is required in respect of all aforementioned risks and estimate all relevant capital ratios of the Bank and the Group;
- Establish a framework for undertaking risk applicable to all levels of management and collective bodies of the Bank and the Group;
- Establish early warning systems and perform stress tests on a regular basis;
- Guide decision making processes at the Group level by providing the necessary risk management related evaluation;
- Develop forecasting models/approaches for the measurement/monitoring of portfolio credit risk through Probability of Default (PD), Loss Given Default (LGD) and Exposure at Default (EAD); and
- Implement risk based "Credit Classification" and "Expected Credit Loss" calculations under IFRS 9, determine credit risk measurement framework, develop and implement the relevant models / approaches.

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5 Financial risk management (continued)

5.1.3 Asset and liability management

The ALCO propose asset and liability management procedures and policies to the Board of Directors. The ALCO is responsible for executing these policies and managing structural interest rate risk within the limits defined by the Board of Directors. The ALCO meets on a monthly basis. At these meetings, the ALCO reviews the critical issues and determines the strategies for asset and liability management.

5.1.4 Internal Audit Division

Internal Audit Division ("IAD") in the Group has objective of conducting assurance and consulting activities designed to add value and improve operations.

5.1.5 Management of specific risks

The Bank's risk management processes distinguish among the types of risks set out below.

5.2 CCR is managed within Credit risk

Credit risk represents the risk arising from the counterparty not fulfilling its responsibilities stated in the agreement either partially or totally. The Credit Risk Committees and Credit Divisions are responsible for managing credit risk of the Group.

The total limit amount which is imposed on debtors individually or as a group is determined according to the size of the exposure and the assessment of different loan allocation parties in the Bank. Beside total limit, product base limits also exist.

The creditworthiness of the Group's debtors is continuously monitored as long as the credit relation exists. Updated financial statements and intelligence is periodically collected by credit departments. The limits of the loan customers are revised periodically and the Group analyses the creditworthiness of the customers and requires collaterals within the framework of its credit policies.

The Group establishes limits over the positions of forward transactions, options and other similar agreements. The credit risk arising from these instruments is managed together with the risks resulting from market fluctuations. The Group monitors regularly risks of forward transactions, options and other similar agreements and reduces the risk if necessary by obtaining margin deposits or entering into netting agreements.

The restructured and rescheduled loans are monitored by the Bank according to its Credit Risk Policy. According to the Credit Risk Policy, the Bank could restructure or reschedule a loan in order to strengthen the liquidity of the loan customer and to increase the collectability of the loan. After evaluation of the loan, the loan is either restructured by issuing an additional loan to the customer or rescheduled by modifying the payment amount or payment plan. The customer's financial position and commercial activities are continuously analyzed and the principal and interest payments of rescheduled loans are monitored by the credit department.

Grades for companies having restructured and rescheduled loans are updated based on the analysis and credit performance of the company.

Maximum exposure to credit risk

The table below shows the maximum exposure to credit risk for the components of the financial statements, without taking account of any collateral held or other credit enhancements attached. For on balance sheet assets, the exposures set out below are based on net carrying amounts as reported in the statement of financial position.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.2 Credit risk (continued)

Gross maximum exposure	December 31, 2019	December 31, 2018
	2015	
T.R. Central Bank	17,103,687	16,768,889
Due from banks (net)	7,447,689	3,880,878
Investments measured at FVTPL	226,164	22,427
Derivative financial assets	7,939,309	12,401,329
Investments measured at FVOCI	12,153,644	8,325,885
Investments measured at amortised cost	16,169,450	12,895,116
Loans and advances to customers	109,445,928	93,467,525
Factoring receivables	1,630,527	1,208,884
Finance lease receivables	5,583,145	5,521,076
Other assets	865,050	1,036,572
Total	178,564,593	155,528,581
Financial guarantees and lending commitments	28,503,244	23,689,246
Credit card limits	28,852,687	22,392,258
Other commitments	54,623,054	43,151,679
Total	111,978,985	89,233,183
Total credit risk exposure	290,543,578	244,761,764

5.2.1 Credit rating system

The Bank aims to manage its loan portfolio based on international best practices. In this respect, the Bank has formed internal scoring and rating systems, based on statistical methods to monitor the credibility of its clients. These systems classify the customers according to their default risk from highest to lowest score or rating. Internal scoring systems are used to improve the efficiency of the loan granting process, to monitor loan portfolio quality effectively and to assist in the determination of the actions required. The Bank uses rating and scoring systems for corporate customers in order to assess the creditworthiness of a customer applying for a loan, and behavioral scoring systems for existing customers in order to calculate the default probability in a certain period of time. These systems are revised periodically based on international best practices and methodologies and calibrated if necessary.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.2 Credit risk (continued)

The Bank utilizes behaviour scorecards in order to monitor retail loans (mortgage loans, consumer credits, credit cards) portfolio. Behaviour scorecards are developed and validated in-house. There are different behaviour scorecards for each product group as well as delinquency status (there are different scorecards for current credits and delinquent credits for each credit type). Behaviour scores are calculated with every installment/statement starting at 3rd month for credit cards and retail loans using payment behaviour of the customer. The scorecards measure the probability that the loan will become non-performing in the following months. All of the scorecards are monitored on a quarterly basis and, if needed, necessary actions are taken to update them. In application and collection stages, the scorecards are utilized heavily in strategies. Behavior scores are also used for selecting target groups for cross-selling and other marketing campaigns.

The most common practice used by the Group to mitigate credit risk is the taking of security for funds advances. The Group implements guidelines on the acceptability of specific classes of collateral. The principal collateral types for loans and advances to customers are:

- Collaterals for mortgages over residential and commercial properties;
- Charges over business assets such as premises, ships, vehicles, inventory and accounts receivable;
- Charges over financial instruments such as debt securities and equities;
- Cash collaterals;
- Bank or personal guarantees.

Revolving credit facilities to individuals and debt securities, treasury and other eligible bills are generally unsecured.

5.2.2 Loans and advances to customers and finance lease receivables restructured

Restructuring activities include extended and/or rescheduled payment arrangements, approved external management plans, arrangement of terms of loan such as modification and deferral of payments, interest rate, currency, collateral structure, granting additional loan sale of collaterals, sale of debts, or sale of company.

If restructuring is entered into for non-performing loans, such loans will be reported as non-performing for a minimum of one year and may be reported as performing if IFRS 9 requirements are met. However as a conservative practice, The Bank continues to classify such loans under non-performing loans. As of December 31, 2019, the total amount of restructured loans included in non performing loans are TL 70,697 (December 31, 2018: TL 91,417).

As of December 31, 2019, the total amount of restructured finance lease receivables included in non performing loans are TL 142,469 (December 31, 2018: TL 159,410).

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.2 Credit risk (continued)

5.2.3 Credit risk by industry sector

An industry sector analysis of the Group's loans and advances to customers are as follows:

Industry sector	December 31, 2019	December 31, 2018
Private individuals	38,774,332	33,120,143
Trade and services (excl. tourism)	21,047,866	18,171,412
Industry & mining	19,622,460	15,517,231
Construction and real estate development	11,286,730	11,636,711
Transportation and telecommunications	11,044,183	8,956,140
Tourism	3,859,387	2,612,992
Small scale industry	2,378,781	2,542,701
Factoring	398,313	467,756
Leasing	906,677	290,013
Other	127,199	152,426
Total	109,445,928	93,467,525

An industry sector analysis of the Group's finance lease receivables are as follows:

Industry sector	December 31, 2019	December 31, 2018
Small scale industry	4,766,683	4,944,146
Industry and mining	481,552	352,401
Construction and real estate development	24,606	31,151
Transportation and telecommunications	126,444	23,922
Tourism	34,886	19,741
Trade and services (excl. tourism)	20,021	17,542
Other	128,953	132,173
Total	5,583,145	5,521,076

An industry sector analysis of the Group's factoring receivables are as follows:

Industry sector	December 31, 2019	December 31, 2018
Industry and mining	425,161	371,683
Construction and real estate development	310,001	228,222
Transportation and telecommunications	163,845	66,458
Trade and services (excl. tourism)	176,397	62,612
Tourism	36,744	27,022
Shipping	6,888	503
Small scale industry	19,985	2,010
Factoring	140,802	69,511
Other	350,704	380,863
Total	1,630,527	1,208,884

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.2 Credit risk (continued)

5.2.4 Counterparty risk

The Group faces counterparty risk from the over-the-counter transactions and the repurchase agreements in which it is involved. Counterparty risk is the risk arising from an obligor's failure to meet its contractual obligations. For the efficient management of counterparty risk, the Bank has established a framework of counterparty limits. The financial institution department is responsible for setting and monitoring the limits.

Counterparty limits are set based on the credit ratings of the financial institutions. The credit ratings are provided by internationally recognized ratings agencies, in particular by Moody's and Standard & Poor's. According to the Bank's policy, if agencies disagree on the creditworthiness of a financial institution, only the lowest rating will be taken into consideration. In cases where a financial institution is not rated by the above agencies, its rating is given by the Bank's internal rating model.

The counterparty limits apply to all financial instruments which the Treasury department actively trades in the interbank market. The limits framework is revised according to the business needs of the Bank and prevailing conditions in international financial markets. A similar limit structure for the management of counterparty risk is enforced across all of the Group's subsidiaries.

The Group seeks to reduce counterparty risk by standardizing relationships with counterparties through International Swaps and Derivatives Association ("ISDA"), Global Master Repurchase Agreement ("GMRA") and Global Master Securities Lending Agreement ("GMSLA") contracts that respectively include all necessary closeout netting clauses and margining agreements. Additionally, for the most active counterparties in over-the-counter derivatives, credit support annexes have been put in effect so that on the basis of daily valuations, net current exposures are managed through margin accounts where cash collaterals can be reciprocally posted.

The Bank avoids taking positions in derivative contracts where the values of the underlying assets are highly correlated with the credit quality of the counterparty.

To calculate capital requirements, the Bank measures the exposure amount by applying a methodology that includes:

- data gathering via risk management systems;
- performance of quantitative and qualitative checks; and
- application of the fair value methodology according to the BRSA.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.3 Market risk

Market risk arises from the uncertainty concerning changes in market prices and rates (including interest rates, equity and bond prices and foreign exchange rates) and their levels of volatility. In recent years, the Group has expanded its trading activities to include a wide variety of financial products in order to enhance its profitability and its service to customers. These trading activities require the Bank to assume market risk, which the Group seeks to identify, estimate, monitor and manage effectively through a framework of principles, measurement processes and a valid set of limits that apply to all of the Group's transactions. The capital required for General Market Risk and Specific Risk is calculated and reported monthly in accordance with the Standard Method defined in the "Regulation on Measurement and Assessment of Capital Adequacy of Banks" issued by the BRSA. The most significant types of market risk for the Group are interest rate risk and foreign exchange risk.

Interest rate risk is the risk related to the potential loss on the Group's portfolio due to adverse movements in the interest rates. Interest rate risk is the risk that the fair value or future cash flows of Group's portfolio will fluctuate because of changes in market interest rates. A principal source of interest rate risk exposure arises from the Group's financial assets at fair value through profit or loss and fair value through OCI bond portfolios, floating rate assets and liabilities carried at amortized cost, and its interest rate exchange traded and OTC transactions.

The Group has to manage the interest rate risk that derives from the positions it retains in Turkish government bonds, denominated mostly in TL. In addition, the Group enters into swap transactions either for hedging purposes, or for proprietary reasons. As a means of hedging, the Group enters into swap transactions in order to hedge the interest rate risk of its Eurobond portfolio, which consists of Turkish government bonds denominated in foreign currency.

The Group also obtains liquidity in US dollars and Euro which are then converted into TL through cross currency interest rate swaps in order to offer loans to its customers. Furthermore, these cross currency interest rate swaps act as a hedge to the interest rate risk that derives from the Group's loan portfolio.

Equity risk is the risk related to the potential loss that might occur due to adverse movements in the prices of stocks and equity indices. The Group holds a limited portfolio of stocks, the majority of which are traded on the Istanbul Stock Exchange, and also retains positions in stock and equity index derivatives traded in the Turkish and international exchanges.

Foreign exchange risk is the risk related to the potential loss due to adverse movements in foreign exchange rates. The foreign exchange risk derives from the Group's Open Currency Position ("OCP").

The Group trades in all major currencies holding mainly short-term positions for trading purposes and for servicing its institutional, corporate, domestic and international clients. According to the Bank's strategy, the end of day OCP should comply with the regulatory limits.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.3 Market risk (continued)

5.3.1 Market risk on fair value through profit or loss (FVPL) and fair value through other comprehensive income (FVOCI) portfolio

The Bank estimates the market risk of its FVPL and FVOCI portfolios by applying a Value-at-Risk ("VaR") methodology. In particular, the Bank has adopted a historical simulation methodology with a 99% confidence interval and a one day holding period. Bank Risk Tolerance and VaR limits for each risk factor are determined in order to manage the market risk efficiently and to keep the market risk within the desired limits. The Group Risk Management Department monitors VaR balances daily for compliance with the limits. Periodic stress tests and scenario analyses are used to support the results of VaR.

The VaR limits have been determined by reference to worldwide best practices; they refer not only to specific types of market risk, such as interest rate, foreign exchange and equity risk, but also to the overall market risk of the Bank's FVPL and FVOCI portfolios.

The tables below present the Bank's VaR for 2019 and 2018;

			Foreign
	Total	Interest Rate	Exchange Risk
2019	VaR	VaR	VaR
As of December 31	64,605	64,480	212
Average	75,783	76,610	2,592
Minimum	44,579	44,888	117
Maximum	130,334	132,184	9,953

	Total	Interest Rate	Exchange Risk
2018	VaR	VaR	VaR
As of December 31	64,868	64,498	880
Average	74,207	76,145	901
Minimum	15,845	15,929	101
Maximum	238,625	243,361	4,524

In addition, the Bank performs back testing in order to verify the predictive power of its VaR model. The calculations involve the comparison of "hypothetical" daily gains and losses with the respective estimates of the VaR model used for regulatory purposes.

Foreign

Stress test analysis is also performed by the Bank on its FVPL and FVOCI portfolios on a monthly basis. The scenarios refer to extreme movements of interest rates and foreign exchange prices and are based on the latest financial crises which have taken place in Turkey.

5.3.2 Limitations of the VaR model

The VaR model is based on certain theoretical assumptions, which under extreme market conditions might not capture the maximum loss the Bank will suffer. The restrictions of the Bank's methodology are summarized as follows:

• The use of historical data series as predictive measures for the behaviour of risk factors in the future might prove insufficient in periods of intense volatility in financial markets;

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.3 Market risk (continued)

5.3.2 Limitations of the VaR model

- The one-day holding period for VaR calculations (or ten days for regulatory purposes) implies that the Bank will be able to liquidate all its trading assets within this length of time. This assumption might underestimate market risk in periods of insufficient liquidity in financial markets or in cases where certain assets in the Bank's portfolio cannot be easily liquidated;
- VaR refers to the plausible loss on the Bank's portfolio for a 99% confidence interval, not taking into account any losses beyond that level;
- All calculations are based on the Bank's positions at the end of each business day, ignoring the intra-day exposures and any realized losses that might have been incurred; and
- VaR estimates rely on small changes in the prices of risk factors. For bigger movements, the methodology would not fully capture the effect on the value of the portfolio.

5.3.3 Interest rate risk in the banking book and interest rate sensitivity

The interest rate risk resulting from the banking book comprises of maturity mismatch risk, yield-curve risk, base risk and option risk. Within the scope of the interest rate risk, the Bank analyzes all these risks periodically, and considering market conditions, manages all aspects of interest rate risk on the banking book effectively in accordance with the Bank's strategy. The Group believes that it maintains adequate measurement, monitoring, and control functions for interest rate risk in the banking book, including:

- measurement systems for interest rate risk that capture all material sources of interest rate risk and that assess the effect of interest rate changes in ways that are consistent with the scope of the Group's activities;
- measurement of vulnerability to loss under stressful market conditions;
- processes and information systems for measuring, monitoring, controlling, and reporting interest rate risk exposures in the banking book; and
- a documented policy regarding the management of interest rate risk in the banking book.

Interest rate risk that would arise from the changes in interest rates depending on the Group's position is managed by the ALCO of the Bank.

Interest rate sensitivity of assets, liabilities and off balance sheet items is analyzed by top management in the ALCO meetings held every month by taking the market developments into consideration.

The Management of the Group follows the interest rates in the market on a daily basis and revises interest rates of the Group when necessary.

In addition to customer deposits and bond issuance, the Bank funds its long term fixed interest rate TL installment loan portfolio with long term (up to 10 years) floating interest rate foreign currency funds obtained from international markets. The Bank swaps the foreign currency liquidity obtained from the international markets to TL liquidity with long term swap transactions (fixed TL interest rate and floating foreign currency interest rate).

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.3 Market risk (continued)

5.3.3 Interest rate risk in the banking book and interest rate sensitivity

Even though the Bank is exposed to structural interest rate risk on its statement of financial position due to the nature of its existing activities, the Bank's policy aims to ensure that this risk stays within the predefined limits. The ALCO aims to protect the economic value of equity, while sustaining a stable earnings profile. Duration/GAP analyses, which rely on calculations of net discounted future cash flows of interest rate sensitive balance sheet items, are conducted to manage this risk.

The Bank runs net economic value sensitivity scenarios with changes in interest rates and interest rate margins, so as to calculate their impact on net economic value. Beside the Basel standard interest rate shock scenario, 2001 crisis, May 2004 and June 2006 scenarios are also simulated.

The interest rate risk on banking book is measured legally as per the "Regulation on Measurement and Evaluation of Interest Rate Risk Resulted from Banking Book as per Standard Shock Method" published by BRSA on August 23, 2011, and the legal limit as per this measurement is monitored and reported monthly to the Asset and Liability Committee, the Board Risk Committee and the Board of Directors.

	Shocks Applied		Gains/Equity-
Type of Currency	(+/- x basis points)	Gains/ (Losses)	(Losses) /Equity
1. TL	(+) 500	(1,344,149)	(5.54)%
	(-) 400	1,216,648	5.01%
2. EUR	(+) 200	145,893	0.60%
	(-) 200	(149,123)	(0.61)%
3. USD	(+) 200	(272,147)	(1.12)%
	(-) 200	297,013	1.22%
Total (of negative shocks)		1,364,538	%5.62
Total (of positive shocks)	<u> </u>	(1,470,403)	%(6.06)

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.3 Market risk (continued)

5.3.3 Interest rate risk in the banking book and interest rate sensitivity

The following table indicates the periods in which financial assets and liabilities re-price as of December 31, 2019:

T 1	21	2010
Decembe	r 31.	2019

A CONTROL	Up to 1 Month	1 to 3 months	3 to 12 months	1 to 5 years	Over 5 years	Non-interest bearing	Total
ASSETS	Month			3 years	3 years	Dearing	10111
Cash and balances with T.R.	5 050 044					12 474 400	10.740.050
Central Bank	5,273,844	-	-	-	-	13,474,408	18,748,252
Due from banks	3,753,802	94,582		.	.	3,599,305	7,447,689
Financial assets at FVTPL	114,899	7,350	13,993	86,489	10,889	59,778	293,398
Derivative financial assets	-	-	-	-	-	7,939,309	7,939,309
Loans and advances to customers	26,322,559	13,031,437	39,207,110	25,648,716	2,905,404	2,330,702	109,445,928
Factoring receivables	875,103	409,956	308,749	28,154	-	8,565	1,630,527
Finance lease receivables	453,733	296,501	1,216,341	3,331,631	172,566	112,373	5,583,145
Financial assets at FVOCI	888,910	951,296	3,187,056	3,129,517	3,756,216	439,283	12,352,278
Financial assets at amortised cost	2,102,380	2,924,348	3,936,398	2,689,458	4,240,488	276,378	16,169,450
Other assets	-	-	-	-	-	7,510,175	7,510,175
Total assets	39,785,230	17,715,470	47,869,647	34,913,965	11,085,563	35,750,276	187,120,151
* *							
LIABILITIES							
Due to other banks	10,289,739	5,000,974	2,695,406	47,281	94,459	194,280	18,322,139
Customer deposits	56,644,110	14,368,541	3,505,154	253,342	149	25,330,303	100,101,599
Derivative financial liabilities	-	-	-	-	-	5,135,493	5,135,493
Debt securities issued	1,573,004	3,021,032	579,328	9,172,748	-	-	14,346,112
Funds borrowed	3,660,296	9,396,528	6,636,235	1,717,694	3,385,579	2,775	24,799,107
Other liabilities and equity	1,597	2,592	8,969	9,035		24,393,508	24,415,701
Total liabilities	72,168,746	31,789,667	13,425,092	11,200,100	3,480,187	55,056,359	187,120,151
On balance sheet sensitivity gap	(32,383,516)	(14,074,197)	34,444,555	23,713,865	7,605,376	(19,306,083)	
Off-balance sheet sensitivity gap	5,271,880	21,627,288	1,917,808	(15,205,275)	(7,384,089)	(6,227,612)	
Total interest sensitivity gap	(27,111,636)	7,553,091	36,362,363	8,508,590	221,287	(23,533,695)	-

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.3 Market risk (continued)

The following table indicates the periods in which financial assets and liabilities re-price as of December 31, 2018:

December 31, 2018

ASSETS	Up to 1 Month	1 to 3 months	3 to 12 months	1 to 5 years	Over 5 years	Non-interest bearing	Total
Cash and balances with T.R.						8	
Central Bank	6,948,687	_	_	_	_	11,525,631	18,474,318
Due from banks	2,878,680	_	2,077	_	_	1,000,121	3,880,878
Financial assets at FVTPL	555	1,644	76	12,825	7,874	22,765	45,739
Derivative financial assets	-	-	-	-	-	12,401,329	12,401,329
Loans and advances to customers	27,801,882	10,331,146	25,218,239	22,394,717	3,418,528	4,303,013	93,467,525
Factoring receivables	761,144	168,116	247,736	31,231	-	657	1,208,884
Finance lease receivables	340,110	277,853	1,162,695	3,346,746	304,876	88,796	5,521,076
Financial assets at FVOCI	293,702	537,796	3,121,016	1,944,080	2,689,994	(134,834)	8,451,754
Financial assets at amortised cost	1,302,442	1,696,535	3,692,648	1,684,718	3,543,329	975,444	12,895,116
Other assets	-	-	-	-	-	6,800,315	6,800,315
Total assets	40,327,202	13,013,090	33,444,487	29,414,317	9,964,601	36,983,237	163,146,934
LIABILITIES							
Due to other banks	10,726,629	2,379,415	1,382,772	41,871	37,416	564,212	15,132,315
Customer deposits	45,241,498	15,890,388	6,049,592	150,735	164	15,820,818	83,153,195
Derivative financial liabilities	1,361	-	-	-	-	6,448,828	6,450,189
Debt securities issued	1,508,886	3,572,556	2,867,030	3,796,432	-	46,628	11,791,532
Funds borrowed	3,626,962	5,231,837	12,743,905	1,417,419	2,350,268	1,976	25,372,367
Other liabilities and equity	2,480	2,539	11,242	21,443		21,209,632	21,247,336
Total liabilities	61,107,816	27,076,735	23,054,541	5,427,900	2,387,848	44,092,094	163,146,934
On balance sheet sensitivity gap	(20,780,614)	(14,063,645)	10,389,946	23,986,417	7,576,753	(7,108,857)	-
Off-balance sheet sensitivity gap	5,271,880	21,627,288	1,917,808	(15,205,275)	(7,384,089)	(6,227,612)	-
Total interest sensitivity gap	(15,508,734)	7,563,643	12,307,754	8,781,142	192,664	(13,336,469)	-

5.3.4 Foreign exchange risk

The Group evaluates its exposure for the effects of fluctuations in the prevailing foreign currency exchange rates on its financial position and cash flows.

The Group enters into foreign currency forward transactions and swap transactions to decrease foreign currency position risk. The Group also engages in foreign currency and Eurobond buy-sell option transactions.

The position limit of the Group related to currency risk is determined according to the Foreign Currency Net Position Standard ratio determined by the BRSA.

Consolidated subsidiaries and associates determine position limit related with currency risk as determined by local regulatory bodies. Branches established abroad conduct their operations in local currencies of the countries they are incorporated in.

As of December 31, 2019, the Group's net foreign currency position, after including the off-balance sheet position (notional values of derivatives) is TL 47,569 short (December 31, 2018: TL 5,496 long).

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.3 Market risk (continued)

5.3.4 Foreign exchange risk

The table summarizes the Group's assets and liabilities and equity at carrying amounts and derivatives at notional amounts categorized by currency.

December 31, 2019

ASSETS	TL	USD	EUR	Other	Total
Cash and balances with T.R. Central Bank ^(*)	1,125,268	10,095,007	6,753,925	774,052	18,748,252
Due from banks	3,631,137	1,722,921	2,055,748	37,883	7,447,689
Financial assets at FVTPL	276,303	11,836	5,259	_	293,398
Derivative financial assets	6,820,665	677,961	440,377	306	7,939,309
Loans and advances to customers	73,247,487	15,159,245	20,829,317	209,879	109,445,928
Factoring receivables	1,411,074	69,948	142,975	6,530	1,630,527
Finance lease receivables	1,421,595	1,136,768	3,014,342	10,440	5,583,145
Financial assets at fair value through other				-	
comprehensive income	4,793,718	5,211,057	2,347,503		12,352,278
Financial assets at amortised cost	8,576,939	5,727,814	1,864,697	-	16,169,450
Investments in joint ventures	199,384	-	-	-	199,384
Intangible assets	479,435	-	-	-	479,435
Property and equipment	3,408,076	-	236	40	3,408,352
Deferred tax assets	448,047	-	-	-	448,047
Other assets	2,922,230	16,743	33,882	2,102	2,974,957
Total assets	108,761,358	39,829,300	37,488,261	1,041,232	187,120,151
LIABILITIES					
Due to other banks	563,088	10,343,174	7,045,090	370,787	18,322,139
Customer deposits (**)	46,547,147	38,066,717	10,714,700	4,773,035	100,101,599
Derivative financial liabilities	3,714,007	1,059,948	361,503	35	5,135,493
Debt securities issued	5,065,658	9,163,041	_	117,413	14,346,112
Funds borrowed	2,019,625	14,176,214	8,196,443	406,825	24,799,107
Retirement benefit obligations	256,263	-	-	· -	256,263
Current income taxes	207,492	-	-	-	207,492
Other liabilities and equity	24,021,631	(406,692)	322,847	14,160	23,951,946
Total	82,394,911	72,402,402	26,640,583	5,682,255	187,120,151
Net on balance sheet position	26,366,447	(32,573,102)	10,847,678	(4,641,023)	-
Net off-balance sheet position	(26,318,878)	32,393,436	(10,734,773)	4,660,215	
Net position including TL	47,569	(179,666)	112,905	19,192	
The position including 112					

^(*) Cash and Balances with T. R. Central Bank Other include TL 737,276 (December 31, 2018: TL 2,020,547) of precious metal deposit account.

^(**)Customer Deposits include TL 3,700,363 (December 31, 2018– TL 1,862,513) of precious metal deposit account

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.3 Market risk (continued)

5.3.4 Foreign exchange risk

As of December 31, 2018, the Group's net foreign currency position, after including the off-balance sheet position (notional values of derivatives) is TL 5,496 long.

December 31, 2018

ASSETS	TL	USD	EUR	Other	Total
Cash and balances with T.R. Central Bank(*)	1,785,593	5,933,093	8,698,390	2,057,242	18,474,318
Due from banks	720,285	1,745,040	1,372,548	43,005	3,880,878
Financial assets at FVTPL	42,381	2,486	872	-	45,739
Derivative financial assets	11,750,134	360,287	290,776	132	12,401,329
Loans and advances to customers	62,523,291	13,226,373	17,540,404	177,457	93,467,525
Factoring receivables	1,074,250	13,428	89,332	31,874	1,208,884
Finance lease receivables	1,513,147	1,007,481	2,996,182	4,266	5,521,076
Financial assets at fair value through other				-	
comprehensive income	4,553,336	3,385,031	513,387		8,451,754
Financial assets at amortised cost	7,879,428	4,840,580	175,108	-	12,895,116
Investments in joint ventures	158,380	-	-	-	158,380
Intangible assets	433,889	-	-	-	433,889
Property and equipment	2,893,390	-	-	61	2,893,451
Deferred tax assets	613,768	-	-	-	613,768
Other assets	2,676,638	21,355	2,249	585	2,700,827
Total assets	98,617,910	30,535,154	31,679,248	2,314,622	163,146,934
LIABILITIES					
Due to other banks	792,196	7,232,375	7,022,877	84,867	15,132,315
Customer deposits (**)	44,641,676	26,265,996	9,659,953	2,585,570	83,153,195
Derivative financial liabilities	5,797,188	446,280	206,721	-	6,450,189
Debt securities issued	4,031,308	7,171,029	531,822	57,373	11,791,532
Funds borrowed	1,115,589	14,253,660	8,110,360	1,892,758	25,372,367
Deferred tax liabilities	-	-	-	-	-
Retirement benefit obligations	193,133	-	-	-	193,133
Current income taxes	153,080	-	-	-	153,080
Other liabilities and equity	20,480,046	250,360	160,048	10,669	20,901,123
Total	77,204,216	55,619,700	25,691,781	4,631,237	163,146,934
Net on balance sheet position	21,413,694	(25,084,546)	5,987,467	(2,316,615)	-
Net off-balance sheet position	(21,419,190)	24,735,748	(5,623,875)	2,307,317	
Net position including TL	(5,496)	(348,798)	363,592	(9,298)	
The position menums 1D					

^(*)Cash and Balances with T. R. Central Bank Other include TL 2,020,547 (December 31, 2017: TL 1,799,886) of precious metal deposit account.

Foreign currency sensitivity

The Group is mainly exposed to EUR and USD currencies.

The following table details the Group's sensitivity to a 10% appreciation and depreciation in the TL against USD and EUR. The 10% rate is the sensitivity rate used when reporting foreign currency risk internally to key management personnel and represents management's assessment of the possible change in foreign exchange rates.

Change in currency

	rate	Effect on net pr	ofit or loss	Effect on equity(*)		
		2019	2018	2019	2018	
USD	10% increase	(13,503)	(3,403)	(67,403)	(36,791)	
USD	10% decrease	13,503	3,403	67,403	36,791	
EUR	10% increase	92	14,117	(479)	10,822	
EUR	10% decrease	(92)	(14,117)	479	(10,822)	

^(*)Effect on equity also includes the effect of the change in foreign currency rates on the statement of profit or loss.

^(**)Customer Deposits include TL 1,862,513 (December 31, 2017– TL 1,198,394) of precious metal deposit account.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.4 Liquidity risk

Liquidity risk arises in the general funding of the Bank's financing and trading activities and in the management of investment positions. It includes the risk of increases in funding costs and the risk of being unable to liquidate a position in a timely manner at a reasonable price.

It reflects the potential mismatch of payment obligation to incoming payments, taking into account unexpected delays in repayments (term liquidity risk) or unexpectedly high payment outflows (withdrawal/ call risk). Liquidity risk involves both the risk of unexpected increases in the cost of the funding the portfolio of asset at appropriate maturities and rates, and the risk of being unable to liquidate a position in a timely manner on reasonable terms.

The primary objectives of the Bank's asset and liability management are to ensure that sufficient liquidity is available to meet the Bank's commitments to its customers in respect of repayment of deposits and ATM transactions, to satisfy the Bank's other liquidity needs and to ensure compliance with capital adequacy and other applicable Central Bank regulations.

The ALCO is responsible for forming and overseeing the implementation of the asset and liability management strategy of the Bank. The objective of the Bank's asset and liability management strategy is to structure the Bank's balance sheet in view of liquidity risk, maturity risk, interest rate risk and foreign exchange risk, while ensuring that the Bank has adequate capital and is using capital to maximize net interest income.

The Bank applies the following liquidity metrics in order to monitor and manage liquidity risk:

- 1- The basic tool for measuring, monitoring, and evaluating liquidity needs and liquidity sources is the liquidity gap report. Liquidity gap reports reflect the liquidity provided by cash inflows and the liquidity needed to fund cash outflows. They incorporate cash flows associated with assets and liabilities into time buckets.
- 2- Liquidity Coverage Ratio (LCR) is a short term quantitative liquidity standard which has been developed by the Basel Committee as part of Basel III. The Bank maintains an adequate level of unencumbered, high-quality liquid assets (HQLA) that can be converted into cash to meet its liquidity needs for a 30 calendar day time horizon under a significantly severe liquidity stress test scenario.

Liquidity Coverage Ratio	FX	FX+TL
December 31, 2019	176.33%	119.50%
Average (%)	180.24%	120.04%
Maximum (%)	236.30%	133.84%
Minimum (%)	113.06%	101.29%
Limit (%)	80.00%	100.00%

The ALCO sets the Bank's policies for interest rate levels and terms for loans and deposits and makes decisions regarding maturities and pricing of loans and deposits. In addition, members of the treasury department, including the group managers, managers, assistant managers and fixed income and foreign exchange traders, meet on a daily basis to monitor the risk exposure of the Bank, particularly the Banks's net foreign currency short position and the daily interest rate gap and duration.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.4 Liquidity risk (continued)

The Banks's treasury department is responsible for managing and implementing the Banks's asset and liability positions on a day-to-day basis and ensuring the availability of funds for all of the Banks's products and services distributed through the Banks's branch network. The Treasury department measures and evaluates on a daily basis the Banks's risk exposure and unfavorable changes in market conditions and regularly monitors the short-term mismatches between assets and liabilities.

The following table indicates the periods in which financial assets and liabilities remaining maturities as of December 31, 2019:

December 31, 2019	Demand	Up to 1 month	1 to 3 months	3 to 12 months	1 to 5 yrs	Over 5 years	Undistributed	Total
Cash and balances with T.R. Central Bank	10,596,474	8,154,087	-	-	-	-	(2,309)	18,748,252
Due from banks	511,615	6,920,005	16,914	-	-	-	(845)	7,447,689
Financial assets at FVTPL	34,013	1,474	7,441	14,154	191,920	11,177	33,219	293,398
Derivative financial assets	-	331,880	1,098,838	2,719,531	3,092,448	696,612	-	7,939,309
Loans and advances to customers	-	20,908,490	8,742,219	31,542,986	33,454,993	12,448,289	2,348,951	109,445,928
Factoring Recaivables	-	438,812	723,720	427,708	31,721	-	8,566	1,630,527
Finance lease receivables	-	453,733	296,501	1,216,341	3,331,631	172,566	112,373	5,583,145
Financial assets at FVOCI	191,467	6,200	976,768	1,488,958	6,573,245	3,109,658	5,982	12,352,278
Financial assets at amortised cost	-	212,797	822,610	1,084,300	8,213,208	5,848,387	(11,852)	16,169,450
Other assets		1,567,004	29,754	<u> </u>	1,308,747		4,604,670	7,510,175
Total assets	11,333,569	38,994,482	12,714,765	38,493,978	56,197,913	22,286,689	7,098,755	187,120,151
Due to banks	194,282	10,289,742	4,330,190	1,457,147	1,121,348	929,430	_	18,322,139
Customer Deposits	25,368,275	56,683,809	14,290,870	3,505,154	253,342	149	_	100,101,599
Derivative financial liabilities	,,	3,751,541	467,861	916,091			_	5,135,493
Debt securities issued	-	1,572,577	2,681,090	918,913	9,173,532	_	_	14,346,112
Funds Borrowed	4,565	2,640,670	1,306,835	5,545,072	10,878,347	4,423,618		24,799,107
Other liabilities	56,085	2,582,838	477,392	965,278	2,784,421	1,283,375	16,266,312	24,415,701
Total liabilities	25,623,207	77,521,177	23,554,238	13,307,655	24,210,990	6,636,572	16,266,312	187,120,151
Liquidity Excess / Gap	(14,289,638)	(38,526,695)	(10,839,473)	25,186,323	31,986,923	15,650,117	(9,167,557)	
Net Off- Balance Sheet Position		128,075	660,565	1,577,261	1,094,394	73,885		3,534,180
Receivables from financial derivative instruments		27,996,638	11,389,515	19,110,747	42,730,763	25,436,082		126,663,745
Liabilities from derivative financial instruments	_	27,868,563	10,728,950	17,533,486	41,636,369	25,362,197	_	123,129,565
Non Cash Loans		1,444,446	3,429,954	10,398,162	5,527,961	574,047	7,128,674	28,503,244
December 31, 2018				· ·		<u> </u>		_
Total Assets	8,997,036	34,677,915	11,612,511	31,326,548	51,071,550	22,468,391	2,992,983	163,146,934
Total Liabilities	15,676,090	67,749,064	22,378,348	19,145,312	15,068,054	7,591,259	15,538,807	163,146,934
Liquidity Excess / Gap	(6,679,054)	(33,071,149)	(10,765,837)	12,181,236	36,003,496	14,877,132	(12,545,824)	-
Net Off- Balance Sheet Position		(477,540)	936,632	2,070,666	2,289,683	31,041		4,850,482
Receivables from financial derivative instruments		18,794,816	14,225,803	22,354,597	37,228,868	18,475,965		111,080,049
Liabilities from derivative financial instruments	-	19,272,356	13,289,171	20,283,931	34,939,185	18,444,924	_	106,229,567
Non Cash Loans		1,246,671	2,179,701	8,419,216	2,914,717	412,843	8,516,098	23,689,246
Tion Cash Louis		1,270,071	2,177,701	0,417,210	29/179/11	712,073	0,510,070	23,007,270

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.4 Liquidity risk (continued)

Analysis of financial liabilities by remaining contractual maturities

The tables below show the Group's maturity distribution of certain financial liabilities, other than derivatives. The tables below are prepared by considering the contractual undiscounted cash flows expected on the nearest cash flow dates. The interest which will be paid at the maturity date is included in these tables. Interest payable for floating rate liabilities are determined by taking the latest rate and applying the same rate for all the future payments. All deposits in remaining maturities table of the contractual liabilities are in callable status.

December 31, 2019

,	Carrying Amount	Demand	Up to 1 month	1 to 3 months	3 to 12 months	1 to 5 yrs	Over 5 years	Total
Due to other banks	18,322,139	3,961,106	6,572,028	4,357,087	1,513,629	1,260,339	973,950	18,638,139
Customer deposits	100,101,599	25,250,471	56,674,998	14,317,711	3,599,000	279,039	181	100,121,400
Debt securities issued	14,346,112	-	1,729,841	2,876,258	1,330,969	10,441,452	-	16,378,520
Funds borrowed	24,799,107	4,565	2,499,933	1,372,146	5,733,059	11,157,600	4,444,848	25,212,151
Financial guarantees and lending commitments ^(*)	28,503,244	7,128,674	1,444,447	3,429,954	10,398,162	5,527,961	574,046	28,503,244
Total	186,072,201	36,344,816	68,921,247	26,353,156	22,574,819	28,666,391	5,993,025	188,853,454

^(*) Amounts related to letters of guarantee represent maturities based on contract and amounts per these maturities and the amounts have the nature to be withdrawn on demand optionally.

December 31, 2018

	Carrying		Up to 1	1 to 3	3 to 12		Over 5	
	Amount	Demand	month	months	months	1 to 5 yrs	years	Total
Due to other banks	15,132,315	6,676,608	5,049,632	1,696,265	768,584	893,988	1,112,929	16,198,006
Customer deposits	83,153,195	14,860,867	45,800,136	16,421,335	6,839,246	179,723	243	84,101,550
Debt securities issued	11,791,532	-	2,666,715	2,215,468	3,644,350	5,279,490	34,711	13,840,734
Funds borrowed	25,372,367	-	1,703,523	1,811,435	8,192,542	8,310,727	7,580,284	27,598,511
Financial guarantees and lending commitments ^(*)	23,689,246	8,516,098	1,246,671	2,179,701	8,419,216	2,914,717	412,843	23,689,246
Total	159,138,655	30,053,573	56,466,677	24,324,204	27,863,938	17,578,645	9,141,010	165,428,047

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.4 Liquidity risk (continued)

Analysis of financial liabilities by remaining contractual maturities (continued)

The tables below show the remaining maturities of derivatives:

	Up to 1					
December 31, 2019	Month	1-3 Months	3-12 Months	1-5 years	Over 5 years	Total
Forward Contracts Buy	2,621,190	1,096,480	2,056,001	903,893	_	6,677,564
Forward Contracts Sell	(2,617,307)	(1,110,362)	(1,973,468)	(1,018,211)	-	(6,719,348)
Swap Contracts Buy(*)	24,641,301	9,641,592	14,820,993	41,392,757	25,436,083	115,932,726
Swap Contracts Sell ^(*)	(24,466,810)	(8,886,217)	(13,009,461)	(39,411,822)	(25,362,196)	(111,136,506)
Futures Buy	-	94,641	4,557	-	-	99,198
Futures Sell	-	(93,475)	(4,437)	-	-	(97,912)
Options Buy	2,594,100	1,120,796	2,455,702	434,110	-	6,604,708
Options Sell	(2,619,785)	(1,123,475)	(2,460,779)	(434,110)	-	(6,638,149)
Other	-	118,804	326,711	772,226	-	1,217,741
Total	152,689	858,784	2,215,819	2,638,843	73,887	5,940,022
	Up to 1				Over 5	
December 31, 2018	Up to 1 Month	1-3 Months	3-12 Months	1-5 years	Over 5 years	Total
	•	1-3 Months 902,506	3-12 Months 602,351	1-5 years 727,309		Total 4,632,195
December 31, 2018 Forward Contracts Buy Forward Contracts Sell	Month					
Forward Contracts Buy	Month 2,400,029	902,506	602,351	727,309		4,632,195
Forward Contracts Buy Forward Contracts Sell	Month 2,400,029 (2,300,428)	902,506 (903,603)	602,351 (589,513)	727,309 (819,265)	years -	4,632,195 (4,612,809)
Forward Contracts Buy Forward Contracts Sell Swap Contracts Buy ^(*)	Month 2,400,029 (2,300,428) 15,063,581	902,506 (903,603) 10,755,485	602,351 (589,513) 20,821,697	727,309 (819,265) 36,895,955	years - - 18,740,180	4,632,195 (4,612,809) 102,276,898
Forward Contracts Buy Forward Contracts Sell Swap Contracts Buy ^(*) Swap Contracts Sell ^(*)	Month 2,400,029 (2,300,428) 15,063,581	902,506 (903,603) 10,755,485	602,351 (589,513) 20,821,697 (18,805,913)	727,309 (819,265) 36,895,955	years - - 18,740,180	4,632,195 (4,612,809) 102,276,898 (94,552,994)
Forward Contracts Buy Forward Contracts Sell Swap Contracts Buy ^(*) Swap Contracts Sell ^(*) Futures Buy	Month 2,400,029 (2,300,428) 15,063,581	902,506 (903,603) 10,755,485	602,351 (589,513) 20,821,697 (18,805,913) 118,507	727,309 (819,265) 36,895,955	years - - 18,740,180	4,632,195 (4,612,809) 102,276,898 (94,552,994) 118,507 (118,507) 6,130,164
Forward Contracts Buy Forward Contracts Sell Swap Contracts Buy ^(*) Swap Contracts Sell ^(*) Futures Buy Futures Sell	Month 2,400,029 (2,300,428) 15,063,581 (13,535,238)	902,506 (903,603) 10,755,485 (9,827,367)	602,351 (589,513) 20,821,697 (18,805,913) 118,507 (118,507)	727,309 (819,265) 36,895,955	years - - 18,740,180	4,632,195 (4,612,809) 102,276,898 (94,552,994) 118,507 (118,507)
Forward Contracts Buy Forward Contracts Sell Swap Contracts Buy ^(*) Swap Contracts Sell ^(*) Futures Buy Futures Sell Options Buy	Month 2,400,029 (2,300,428) 15,063,581 (13,535,238) - 3,043,101	902,506 (903,603) 10,755,485 (9,827,367) - 2,321,887	602,351 (589,513) 20,821,697 (18,805,913) 118,507 (118,507) 765,176	727,309 (819,265) 36,895,955	years - - 18,740,180	4,632,195 (4,612,809) 102,276,898 (94,552,994) 118,507 (118,507) 6,130,164

^(*)Interest rate swap transactions are settled in net amounts.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.5 Fair values of financial assets and liabilities

a. Financial instruments not measured at fair value

The table below summarizes the carrying amounts and fair values of those financial assets and liabilities not presented on the Group's statement of financial position at fair value and for which the fair value is different from the carrying amount.

		Dece	mber 31, 2019		
Financial assets	Carrying		Fair Val	ue	
	amount	Level 1	Level 2	Level 3	Total
Loans and advances to customers (Note 23)	109,445,928	-	109,266,119	-	109,266,119
Finance lease receivables	5,583,145	-	5,818,906	-	5,818,906
Financial assets at amortised cost	16,169,450	15,234,741	880,548	-	16,115,289
		Dece	mber 31, 2019		
Financial liabilities	Carrying		Fair Val	ue	
	amount	Level 1	Level 2	Level 3	Total
Customer deposits	100,101,599	27,891,794	72,188,830	-	100,080,624
Debt securities issued	14,346,112	-	14,189,700	-	14,189,700
Funds borrowed	24,799,107	-	24,755,375	-	24,755,375
		Decei	mber 31, 2018		
Financial assets	Carrying		Fair Val	ue	
	amount	Level 1	Level 2	Level 3	Total
Loans and advances to customers (Note 23)	93,467,525	-	90,279,212	-	90,279,212
Finance lease receivables	5,521,076	-	5,041,112	-	5,041,112
Financial assets at amortised cost	12,895,116	11,024,080	981,031	-	12,005,111
		Decei	mber 31, 2018		
Financial liabilities	Commin		Fair Valı	ue	
Financial liabilities	Carrying amount	Level 1	Fair Valu Level 2	Level 3	Total
Financial liabilities Customer deposits		Level 1 17,553,666			Total 83,153,195
	amount		Level 2		-

The following methods and assumptions were used to estimate the fair values of the above financial instruments at December 31, 2019 and 2018:

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Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.5 Fair values of financial assets and liabilities (continued)

a. Financial instruments not measured at fair value (continued)

Loans and advances to customers and finance lease receivables: The fair value of loans and advances to customers and finance lease receivables with fixed interest rates is estimated using discounted cash flow models. The discount rates are based on current market interest rates offered for instruments with similar terms to the same borrowers or borrowers of similar credit quality. The carrying amount of floating rate loans is considered to approximate their fair values.

Customer deposits: The fair value of demand deposits is the payable amount at customer intention for withdrawal. The fair value of floating rated placements and the overnight deposits approximates their carrying amount. The fair value of fixed rate time deposits is calculated by discounting the expected future cash flows using the interest rate prevailing in the market.

Debt securities issued: Fair value is estimated using market prices, or if such are not available, using a discounted cash flow analysis, based on current market rates of similar maturity debt securities.

Funds borrowed: Fair value is estimated using market prices, or if such are not available, discounted cash flow analysis based on the Group's current incremental borrowing rates for similar types of borrowing arrangements is used.

Amortized cost investments: Fair value is calculated using market prices.

b. Financial instruments measured at fair value

The tables below present the fair values of those financial assets and liabilities presented on the Group's statement of financial position at fair value by fair value measurement level at December 31, 2019 and 2018, as described in Note 2.18.

		December 3	31, 2019	
Financial assets	Level 1	Level 2	Level 3	Total
Financial assets at FVTPL	293,398		_	293,398
Derivative financial assets	1,372	7,937,937	-	7,939,309
Loans and advances to customers designated at FVTPL (Note 23)	-	-	86,838	86,838
Financial assets at fair value through other comprehensive income	11,971,520	380,758	-	12,352,278
Financial liabilities	Level 1	Level 2	Level 3	Total
Derivative financial liabilities	212	5,135,281	-	5,135,493
		December 3	31, 2018	
Financial assets	Level 1	December 3	31, 2018 Level 3	Total
Financial assets Financial assets at FVTPL	Level 1 45,739			Total 45,739
Financial assets at FVTPL	45,739	Level 2		45,739
Financial assets at FVTPL Derivative financial assets	45,739	Level 2	Level 3	45,739 12,401,329
Financial assets at FVTPL Derivative financial assets Loans and advances to customers designated at FVTPL (Note 23)	45,739 2,696	Level 2 12,398,633	Level 3	45,739 12,401,329 110,032
Financial assets at FVTPL Derivative financial assets Loans and advances to customers designated at FVTPL (Note 23)	45,739 2,696	Level 2 12,398,633	Level 3	45,739 12,401,329 110,032

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.5 Fair values of financial assets and liabilities (continued)

b. Financial instruments measured at fair value (continued)

Level 3 Financial Instruments:

Level 3 financial instruments at December 31, 2019 include loans and advances to customers which are carried at fair value through profit or loss and which are valued using discounted cash flow valuation techniques incorporating unobservable credit spreads. The Bank conducts a review of fair value hierarchy classification on a quarterly basis.

Reconciliation of fair value measurements in Level 3 is presented below:

	2019	2018
	Loans and	Loans and
	advances to	advances to
	customers	customers
	designated at FVTPL	designated at FVTPL
Balance at January 1	110,032	
Transfer into / (out of) level 3	(47,455)	-
Gain / (losses) included in statement of profit or loss	24,261	-
Gain / (losses) included in OCI	-	-
Purchases (*)	=	110,032
Sales	-	-
Settlements		
Balance at December 31	86,838	110,032

^(*)The details of the balance are amounting to TL 110,032 as of December 31, 2018 under Financial Assets at Fair Value Through Profit and Loss, which is disclosed in Note 23.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

5.6 Capital adequacy and credit ratings

The Group's capital base includes all types of regulatory eligible Own Funds, as these are defined by the BRSA, which differs from the total equity under IFRS. Among others, the Group's regulatory own funds include the share capital, the share premium account, the reserves, retained earnings, and subordinated debt issues.

The Group manages actively its capital base by taking advantage of the contemporary means for raising capital, with the objective to sustain its capital adequacy ratios well above the minimum regulatory levels and at the same time to improve the weighted average cost of capital to the benefit of its shareholders. In this framework, both the calculation of the capital requirements and the dynamic management of the capital base are embedded in the business plan and the annual budgeting processes, in accordance with the capital adequacy targets that have been set in the Group's Risk Strategy.

The Group's total capital ratio is calculated by dividing its Tier 1 capital, which comprises general provisions per its statutory financial statements and evaluation surplus, by the aggregate of its risk-weighted assets, risk-weighted off-balance sheet exposures, market and other risk provisions. In accordance with the BRSA guidelines the Group must, in general, maintain a total capital ratio in excess of 8%; however, if operations include activities in offshore regions, as is the case with the Bank, the BRSA imposes 12%.

With the regulations published in the Official Gazette dated June 28, 2012, the BRSA has introduced a Basel II based method for the Banking system. The Group's consolidated capital adequacy ratio is 15.23% calculated as in accordance with the related Communique as of December 31, 2019 (December 31, 2018: 14.84%).

The capital adequacy of the Group in accordance with the BRSA guidelines is as follows:

	December 31,	December 31,
	2019	2018
Tier I capital	20,386,260	14,320,995
Tier II capital	4,084,692	4,756,934
Total capital	24,470,952	19,077,929
Deductions	(28,525)	(83,538)
Net total capital	24,442,427	18,994,391
Risk-weighted assets (including market & operational risk)	160,490,548	127,985,545
Capital adequacy ratios		
Tier I ratio	12.70%	11.19%
Total capital ratio	15.23%	14.84%

Credit ratings

The table below sets forth the credit ratings that have been assigned to the Bank by Moody's Investors Service Limited (referred to below as "Moody's") and Fitch Ratings Ltd. (referred to below as "Fitch"). All credit ratings have been affirmed and/or upgraded as follows.

	Fitch November 2019	Moody's June 2019
Long-term foreign currency	B+	В3
Short-term foreign currency	В	NP
Long-term local currency deposit	BB-	B1
Short-term local currency deposit	В	NP
National long-term national rating	AA(tur)	-
Support	4	-
Bank financial strength	B+	-
Outlook	Stable	Negative

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

6 Segment reporting

6.1 Operating segment

The Group has identified operating segments in a manner consistent with the internal reporting provided to the chief operating decision maker, the Board of Directors. The Group manages its business through the following business segments:

Retail banking

Retail banking includes individuals and micro enterprises. The Banks's retail banking activities consist primarily of mortgages, consumer lending, credit and debit card services, deposits and investments and insurance products.

Corporate and commercial banking

Corporate and commercial banking includes lending to all large and medium-sized companies. The Banks's corporate and commercial banking activities include trade finance, traditional lending, SME banking, project finance, cash management, corporate syndication and secondary market transactions, deposits and the issuance of certificated debt instruments. The Banks's SME banking activities consist primarily of revolving credit lines, installment loans, overdrafts, business housing loans and deposits.

Treasury and head office

The Bank also serves in financial assets at fair value through profit or loss and treasury operations. The main function of Treasury Segment is managing the liquidity of the Bank and interest and foreign currency risks resulting from market conditions.

The segment information related to the above segments are presented on the basis used by the Board of Directors to evaluate performance. The Board of Directors reviews discrete financial information for each of its segments, including measures of operating results. The segments are managed primarily on the basis of their results, which are measured on a basis which is broadly consistent with the Summary of Significant Accounting Policies described in Note 2, with the exception of certain adjustments. Management considers that this information provides the most appropriate way of reviewing the performance of the business. The adjustments are as follows:

- **Fee income and expense:** Fees received and paid which are considered an integral part of the effective interest rate calculation are presented as 'Net fee and commission income' instead of "Net interest income" as under IFRS.
- Recoveries on loans and advances to customers previously written-off: The subsequent recovery on loan amounts previously written off are reported in "net other income" instead of as a reduction of the provision for loan losses as under IFRS.
- **Operating expenses:** Represents operating expenses which can not be attributed to the segment results of operations.
- Other: Adjustments included in other represent the unwinding of interest, which is not included in the provision for impairment losses in the segment results of operations, and other individually insignificant reclassifications.

Transactions between the business segments are on normal commercial terms and conditions.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019 Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

6.1 Operating segment (continued)

Breakdown by business segment	Retail Banking	Corporate and Commercial Banking	Treasury and Head Office	Total	Reconciling Items	Total
10 11 11 11 11 11 11 21 2010						
12 month period ended December 31, 2019		2 102 125	1 212 102	0.404.04	(40.040)	
External operating income	4,686,216	3,492,427	1,312,402	9,491,045	(13,262)	9,477,783
Net interest income	2,547,694	2,765,721	2,526,684	7,840,099	(1,373,009)	6,467,090
Net fee and commission income	2,023,007	716,756	83,777	2,823,540	(213,983)	2,609,557
Net other income	115,515	9,950	(1,298,059)	(1,172,594)	1,573,730	401,136
Total operating income	4,686,216	3,492,427	1,312,402	9,491,045	(13,262)	9,477,783
Total operating expenses	(2,207,194)	(1,552,648)	(427,041)	(4,186,883)	204,597	(3,982,286)
Impairment losses on loans and advances to customers, finance						
lease receivables and factoring receivables	(397,012)	(1,584,209)	(12,457)	(1,993,678)	(13,154)	(2,006,832)
Profit before tax	2,082,010	355,570	872,904	3,310,484	178,181	3,488,665
Total Assets	39,764,608	76,885,580	58,283,739	174,933,927	12,186,224	187,120,151
Total Liabilities	68,846,852	31,246,986	53,758,767	153,852,605	33,267,546	187,120,151
Other Segment items	458,631	242,203	(143,667)	557,167	594,980	1,152,147
Capital expenditure	25,693	13,569	(2,042)	37,220	596,130	633,350
Depreciation and amortization	432,938	228,634	(141,625)	519,947	(1,150)	518,797
Depreciation and amortization	432,736	220,034	(141,023)	317,747	(1,150)	310,777

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

6.1 Operating segment (continued)

	D . 11D . 11	Corporate and Commercial	Treasury and	m . 1	Reconciling	m . 1
Breakdown by business segment	Retail Banking	Banking	Head Office	Total	Items	Total
12 month period ended December 31, 2018						
External operating income	3,695,067	3,725,603	1,567,804	8,988,474	(8,633)	8,979,841
Net interest income	2,078,539	2,901,813	2,897,429	7,877,781	(1,703,372)	6,174,409
Net fee and commission income	1,570,507	647,526	34,104	2,252,137	(178,979)	2,073,158
Net other income	46,021	176,264	(1,363,729)	(1,141,444)	1,873,718	732,274
Total operating income	3,695,067	3,725,603	1,567,804	8,988,474	(8,633)	8,979,841
Total operating expenses	(1,823,918)	(1,372,501)	(334,607)	(3,531,026)	55,854	(3,475,172)
Impairment losses on loans and advances to customers, finance						
lease receivables and factoring receivables	(574,009)	(1,496,184)	(161,103)	(2,231,296)	(23,032)	(2,254,328)
Profit before tax	1,297,140	856,918	1,072,094	3,226,152	24,189	3,250,341
Total Assets	33,583,981	66,792,610	52,306,155	152,682,746	10,464,188	163,146,934
Total Liabilities	56,362,699	26,784,970	46,230,627	129,378,296	33,768,638	163,146,934
Other Segment items	422,355	230,107	(87,680)	564,782	972,264	1,537,046
Capital expenditure	230,912	125,805	(49,869)	306,848	969,858	1,276,706
Depreciation and amortization	191,443	104,302	(37,811)	257,934	2,406	260,340

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

6.2 Geographical information

The Bank and its subsidiaries operate principally in Turkey and Bahrain. As the operation results outside of Turkey are quite negligible in the consolidated results, no further geographical segment information is presented.

7 Net interest income

	12 month period ended December 31,		
	2019	2018	
Interest earned on:			
Loans and advances to customers	15,451,715	13,541,093	
Securities	2,418,407	2,557,569	
Financial assets at FVPL	11,452	8,091	
Financial assets at FVOCI	1,088,038	820,642	
Financial assets at amortised cost	1,318,917	1,728,836	
Finance lease receivables	505,876	464,731	
Factoring receivables	253,979	270,112	
Due from banks	817,340	614,086	
Interest income	19,447,317	17,447,591	
Interest payable on:			
Customer deposits	(7,780,693)	(5,942,315)	
Debt securities issued and funds borrowed	(4,674,531)	(4,343,893)	
Due to other banks	(525,003)	(986,974)	
Interest expense	(12,980,227)	(11,273,182)	
Net interest income	6,467,090	6,174,409	

8 Net fee and commission income

	12 month period ended December 31		
	2019	2018	
Fee and commission income			
Banking	2,603,702	2,069,597	
Brokerage and fund management	64,137	48,185	
Other	79,930	79,336	
Total	2,747,769	2,197,118	
Fee and commission expense			
Banking	(98,133)	(98,117)	
Other	(40,079)	(25,843)	
Total	(138,212)	(123,960)	
Net fee and commission income	2,609,557	2,073,158	

12 month naried anded December 21

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

9 Net trading income and results from investment securities

	12 month period ended December 31,	
	2019	2018
Gains on foreign exchange	183,067	416,865
(Un)realized gains on interest rate instruments	(25,167)	200,026
Realized losses on equity shares under FVTPL	1,253	(51)
Realized gains from investment securities	63,850	17,276
Total	223,003	634,116

10 Other operating income

Other operating income mainly consists of gain on liquidation of foreclosed assets, rental income and other operating income. Legally non-performing loan receivables amounted TL 959,700 have been sold for TL 88,200 and booked under other operating income in 2019. TL 41,182 of the sold amount of consists of the expenses of the portfolio sold in previous periods and the collections made during the sales process.

11 Personnel expenses

	12 month period ended December 31,	
	2019	2018
Wages and salaries	1,123,312	926,448
Bonuses and other fringe benefits	229,383	200,123
Social security costs	187,995	150,902
Pension costs: defined benefit plans (Note 12)	65,411	55,097
Other personnel related benefits	236,438	198,641
Total	1,842,539	1,531,211

The average number of employees of the Group during the year 2019 and 2018 was 13,498 and 13,158, respectively. Other personnel related benefits include the cost of various benefits such as health insurance, transportation, food and training costs.

12 Retirement benefit obligations

Defined benefit plans

In accordance with Turkish Labor Law, the Bank and its subsidiaries incorporated in Turkey are required to make lump-sum payments to employees whose employment is terminated due to retirement or for reasons other than resignation or misconduct. In Turkey, such payments are calculated on the basis of 30 days' pay (limited to a maximum of TL 6,379.86 (full TL) as of December 31, 2019, (TL 5,001.76 (full TL) as of December 31, 2018) per year of employment at the rate of pay applicable at the date of retirement or termination. In the financial statements as of December 31, 2019, the Group reflected a liability calculated using the Projected Unit Credit Method and based upon factors derived using their experience of personnel terminating their services and being eligible to receive retirement pay and discounted by using the current market yield on government bonds at the reporting date. As of December 31, 2019, retirement pay liability of the Bank and local subsidiaries are accounted for based on the actuarial calculations performed by an independent actuary. The plan is unfunded and hence, there are no plan assets disclosed.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

12 Retirement benefit obligations (continued)

Amount recognized in the statement of profit or loss:

	12 month period	ended December 31,
	2019	2018
Current service cost	24,218	25,688
Interest cost on obligation	30,447	22,069
Settlement / curtailment / termination loss	10,746	7,340
Total charge	65,411	55,097
Defined benefit obligation in the statement of financial pos		Dogombor 21, 2018
	December 31, 2019	December 31, 2018
Present value of unfunded obligations	256,263	193,133
Total	256,263	193,133
Reconciliation of defined benefit obligation:		
	2019	2018
Defined benefit obligation at January 1	193,133	193,738
Current service cost	24,218	25,688
Interest cost on obligation	30,447	22,069
Benefits paid directly by the Group	(33,369)	(34,820)
Settlement/ curtailment losses	10,745	7,340
Actuarial losses / (gains)	31,089	(20,882)
Defined benefit obligation at December 31	256,263	193,133
Remeasurements	December 31, 2019	December 31, 2018
Liability gain/(loss) due to changes in financial assumptions	(9,600)	42,950
Liability experience loss arising during the year	(21,489)	(22,068)
Total actuarial gain/(loss) recognised in OCI	(31,089)	20,882

The weighted average assumptions used to determine the net periodic pension costs for the year ended December 31, 2019 and 2018 are:

	<u>December 31, 2019</u>	<u>December 31, 2018</u>
Discount rate	12.10%	16.30%
Rate of compensation increase	9.20%	13.00%
Plan duration	15.4	15.3
Inflation rate	8.20%	12.00%

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

13 General and administrative expenses

	12 month period ended December 31,	
	2019	2018
Utilities	384,342	295,036
Promotion and advertisement expenses	274,961	220,082
Other administrative expenses	195,642	179,871
Saving deposits insurance fund premiums	190,266	119,200
Credit card expenses	183,780	115,541
Duties and taxes other than on income	104,631	87,811
Withholding taxes and duties on loans granted	89,311	79,238
Audit, consulting and other services	62,682	58,379
Legal expenses	56,868	118,553
Third-party remuneration expenses and fees	51,380	44,829
Stationery and other consumables	40,942	33,785
Research expenses	20,197	16,663
Traveling expenses	16,898	14,024
Rent expenses	10,537	251,956
Subscriptions and contributions	7,596	5,675
Total	1,690,033	1,640,643

14 Depreciation, amortization and impairment charges

	12 month period ended December 31,		
	2019	2018	
Intangible assets (Note 29)	139,025	120,234	
Property and equipment (Note 30)	160,246	139,704	
Impairment charge (Note 30)	-	402	
Right of use (Note 30)	219,526	-	
Total	518,797	260,340	

15 Impairment losses on loans and advances to customers, finance lease receivables, factoring receivables and other impairment charges

	12 month period ended December 31,		
	2019	2018	
Impairment losses on loans and advances to customers (Note 23)	1,863,631	2,070,463	
Impairment losses on finance lease receivables (Note 25)	88,994	87,684	
Impairment losses on factoring receivables (Note 24)	8,948	23,870	
Other impairment charges	46,249	75,123	
Recovery (*)	(990)	(2,812)	
Total	2,006,832	2,254,328	

 $^{^{(*)}}$ Includes proceeds from NPL sales.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

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15 Impairment losses on loans and advances to customers, finance lease receivables, factoring receivables and other impairment charges (continued)

	2019	2018
Stage 1	(190,454)	52,832
Stage 2	(75,064)	675,373
Stage 3	2,214,766	1,453,634
Other impairment charges	57,584	72,489
Total	2,006,832	2,254,328

16 Other provision expenses

	12 month period ended December 31,		
	2019	2018	
Other provision expenses (*)	20,346	91,647	
Total	20,346	91,647	

^(*) Prior year charge include one material legal case provision against the Bank for which 100% of the risk is covered with provision.

17 Income tax expense

Corporate Tax

The Group is subject to Turkish corporate taxes. Provision is made in the accompanying financial statements for the estimated charge based on the Group's results for the years and periods. Turkish tax legislation does not permit a parent company and its subsidiary to file a consolidated tax return.

Therefore, provisions for taxes, as reflected in the accompanying consolidated financial statements, have been calculated on a separate-entity basis. Corporate tax is applied on taxable corporate income, which is calculated from the statutory accounting profit by adding back non-deductible expenses, and by deducting dividends received from resident companies, other exempt income and investment incentives utilized.

50% of gain from the sale of real estate which are held more than two years in the assets of the Bank and 75% of gain on disposal of subsidiary shares which are held for more than two years in the assets of the Bank are exemption from tax according to Corporate Tax Law in condition with adding these gains into equity or allocating into a specific fund account in the Bank's liabilities for five years.

Companies calculate their advance tax at the rate of 20% (22% for taxation periods of 2018, 2019 and 2020) on their quarterly financial profits, declare until the 14th day of the second month following that period and pay until the evening of the seventeenth day. The advance tax paid belongs that year and is offset from the corporation tax that will be calculated on the tax declaration of the companies to be given in the following year. If the advance tax paid amount remains after offsetting, this amount could be either returned as cash or offset.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

17 Income tax expense (continued)

According to the Corporate Tax Law, financial losses in the declaration can be deducted from the corporate tax base of the period not exceeding 5 years. Declarations and related accounting records can be examined within five years by the tax office. On the other hand, if document subjects to stamp duty and the statute of limitations of tax and penalty is used after the expiry of the time limit, the taxable income of document is regenerated.

Furthermore, there is no procedure for a final and definitive agreement on tax assessments. Companies file their tax returns between April 1-25 following the close of the accounting year to which they relate. Tax authorities may, however, examine such returns and the underlying accounting records and may revise assessments within five years.

The details of income tax expense are as follows:

	12 month period ended December 31,		
	2019	2018	
Current tax	(239,008)	(803,200)	
Deferred tax benefit (Note 31)	(386,117)	105,276	
Total	(625,125)	(697,924)	
Profit before tax	3,488,665	3,250,341	
Tax calculated based on the current tax rate of 22% (*)	(767,506)	(715,065)	
Effect of income not subject to taxation ^(**)	150,887	23,061	
Effect of expenses not deductible for tax purposes	(8,506)	(5,920)	
Income tax expense	(625,125)	(697,924)	

^(*)The corporate income tax rate applied in 2019 and 2018 are 22% and 22% respectively.

Income withholding tax

In addition to corporate taxes, companies should also calculate income withholding taxes on any dividends distributed, except for Turkish resident companies receiving dividends from who are also Turkish residents or Turkish branches of foreign companies. Income withholding tax applied between April 24, 2003 –July 22, 2006 is 10% and commencing from July 23, 2006, this rate has been changed to 15% upon the Council of Ministers' Resolution No: 2006/10731. Undistributed dividends incorporated in share capital are not ssubject to income withholding tax.

The Group offsets current tax assets and current tax liabilities separately for each entity considering the legally enforceable right to set off the recognized amounts. As of December 31, 2019, after the offsetting, the corporate tax payables is TL 207,492 (December 31, 2018, corporate tax payable amounting to TL 153,080) in the accompanying consolidated financial statements.

The advance corporate income tax rate applied in 2019 and 2018 are 22% and 22% respectively.

^(**) Includes Bahrain tax exception in 2019.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

18 Earnings per share

	December 31, 2019	December 31, 2018
Net profit attributable to equity holders of the parent	2,862,992	2,551,920
Net profit attributable to QNB Finansbank ordinary		
shareholders	2,862,992	2,551,920
Adjusted weighted average number of ordinary shares		
outstanding	33,500,000,000	33,500,000,000
Basic and diluted earnings per share	0.0855	0.0762

The Bank decided to increase its share capital through a bonus issue by way of the capitalization of its extraordinary reserves in 2019 and 2018.

19 Cash and balances with T.R. Central Bank

	December 31, 2019	December 31, 2018
Cash on hand Balances with T.R. Central Bank - Unblocked Balances with T.R. Central Bank - Blocked	1,644,565 8,944,178 8,159,509	1,705,429 6,925,505 9,843,384
Total	18,748,252	18,474,318

As of December 31, 2019 an amount of TL 2,309 (December 31, 2018 – TL 37,141) ECL was provided for the account T.R. Central Bank due to the adoption of IFRS 9.

As of December 31, 2019, the reserve rates for the reserve deposits at the Central Bank of Turkey for Turkish Lira are implemented within an interval from 1% to 2% depending on the maturity of the deposits (December 31, 2018 - 1.5% to 8%) and the reserve rates for the foreign currency liabilities are within an interval from 5% to 21% depending on the maturity of the deposits (December 31, 2018 - 4% to 20%).

20 Due from banks

	December 31, 2019	December 31, 2018
Time deposits with banks	3,584,463	3,137,246
Demand deposit with banks	822,264	643,562
Securities purchased under agreements to resell	3,040,962	100,070
Total	7,447,689	3,880,878

The Group does not have any past due or impaired balances due from banks.

The amount of collaterals given for derivative transactions, which are included above, as of December 31, 2019 and 2018 are TL 3,124,126 and TL 2,127,402, respectively.

As of December 31, 2019, an amount of TL 5,498 (December 31, 2018 – TL 445) ECL was provided for the account due from banks due to the adoption of IFRS 9.

The table below shows the credit quality and the maximum exposure to credit risk based on the Group's internal credit rating system and year-end stage classification.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

20 Due from banks (continued)

		December 31, 2	2019	
Internal Rating Grade	Stage 1	Stage 2	Stage 3	Total
High grade	7,453,187	-	-	7,453,187
Standard grade	-	-	-	-
Sub-Standard grade	-	-	-	-
Past due but not impared	-	-	-	-
Non-performing	-	-	-	-
Individually impaired	-	-	-	-
Total	7,453,187	-	-	7,453,187

		December 31,	2018	
Internal Rating Grade	Stage 1	Stage 2	Stage 3	Total
High grade	3,881,323	-	-	3,881,323
Standard grade	-	-	_	-
Sub-Standard grade	-	-	-	-
Past due but not impared	-	-	_	-
Non-performing	-	-	-	-
Individually impaired	-	-	-	-
Total	3,881,323	-	-	3,881,323

The table below shows the changes in the gross carrying amount and the corresponding ECL allowances.

	December 31, 2019			
_	Stage 1	Stage 2	Stage 3	Total
Gross carrying amount as January 1, 2019	3,881,323	-	-	3,881,323
New assets originated or purchased	3,571,864	-	-	3,571,864
Assets derecognised or repaid (excluding write offs)	-	-	-	-
Transfers to Stage 1	-	-	-	-
Transfers to Stage 2	-	-	-	-
Transfers to Stage 3	-	-	-	-
Changes to contractual cash flows due to modifications not				
resulting in derecognition	-	-	-	-
Amounts written off	-	-	-	-
Foreign exchange adjustments	-	-	-	-
Total	7.453.187	_		7,453,187

	December 31, 2018			
	Stage 1	Stage 2	Stage 3	Total
Gross carrying amount as January 1, 2018	1,902,768	-	-	1,902,768
New assets originated or purchased	1,978,555	-	-	1,978,555
Assets derecognised or repaid (excluding write offs)	-	-	-	-
Transfers to Stage 1	-	-	-	-
Transfers to Stage 2	-	-	-	-
Transfers to Stage 3	-	-	-	-
Changes to contractual cash flows due to modifications not				
resulting in derecognition	-	-	-	-
Amounts written off	-	-	-	-
Foreign exchange adjustments	-	-	-	-
Total	3,881,323	-	-	3,881,323

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

20 Due from banks (continued)

	December 31, 2019			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at January 1, 2019	445	-	-	445
Transfers to Stage 1	-	-	-	-
Transfers to Stage 2	-	-	-	-
Transfers to Stage 3	-	-	-	-
Impairment allowance for the period, net	5,053	-	-	5,053
Amounts written off	-	-	-	-
Foreign exchange adjustments	-	-	-	-
Total	5,498	_	-	5,498

	December 31, 2018			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at January 1, 2018	202	-	-	202
Transfers to Stage 1	-	-	-	-
Transfers to Stage 2	-	-	-	-
Transfers to Stage 3	-	-	-	-
Impairment allowance for the period, net	243	-	-	243
Amounts written off	-	-	-	-
Foreign exchange adjustments	-	-	-	-
Total	445	-	-	445

21 Investments measured at fair value through profit or loss

	December 31, 2019	December 31, 2018
Turkish corporate bonds held for trading	_	9
Turkish government bonds held for trading	226,164	22,418
Equity shares held for trading	50,389	9,251
Mutual funds held for trading	16,845	14,061
Total	293,398	45,739

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

22 Derivative financial instruments

December 31, 2019	Notional	Assets	Liabilities
Derivatives held for trading:			
Interest rate derivatives	142,475,456	3,532,954	(3,420,064)
Foreign exchange derivatives	26,158,715	219,484	(145,013)
Other types of derivatives	1,414,852	-	-
Fair value hedging derivatives:			
Interest rate derivatives	30,105,102	2,827,028	(689,242)
Foreign Exchange derivatives	-	-	-
Cash flow hedging derivatives:			
Interest rate derivatives	50,106,695	1,359,843	(881,174)
Total	250,260,820	7,939,309	(5,135,493)
December 31, 2018	Notional	Assets	Liabilities
Derivatives held for trading:			
Interest rate derivatives	130,580,592	5,151,188	(5,454,759)
Foreign exchange derivatives	18,920,867	278,619	(273,355)
Other types of derivatives	1,052,453	2,576	(2,596)
Fair value hedging derivatives:			
Interest rate derivatives	26,613,395	4,150,209	(372,203)
Foreign Exchange derivatives	1,945,346	4,453	(11,103)
Cash flow hedging derivatives:			
Interest rate derivatives	40,343,174	2,814,284	(336,173)
Total	219,455,827	12,401,329	(6,450,189)

The Group's derivative financial instruments mostly comprise of OTC derivatives.

Cash flow hedge accounting:

Loans:

The Parent Bank applies cash flow hedge accounting using interest rate swaps in order to hedge itself from long term floating interest rate loans from changes in market interest rates. The Parent Bank implements efficiency tests at the balance sheet dates for hedging purposes; the effective portions are accounted for under equity "Hedging Funds", whereas the ineffective portions are accounted for at income statement as defined in IFRS 9. As at balance sheet date, swaps amounting to USD 875 Million (December 31, 2018 – None) are subject to hedge accounting as hedging instruments. As a result of the mentioned hedge accounting, in the current period, fair value gain before taxes amounting to TL 20,790 (December 31, 2018 – None) are accounted for under equity during the current period.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

Derivative financial instruments (continued)

Deposits:

The Parent Bank applies cash flow hedge accounting using interest rate swaps in order to hedge itself from the interest rate changes of deposits that have an average maturity of 3 months. The Bank implements cash flow hedge accounting with interest rate swaps. The Parent Bank implements efficiency tests at the balance sheet dates for hedging purposes; the effective portions are accounted for under equity "Hedging Funds", whereas the ineffective portions are accounted for at income statement as defined in IFRS 9. As at the balance sheet date, swaps amounting to TL 1,600,000 are subject to hedge accounting as hedging instruments (December 31, 2018 – TL 2,150,000). As a result of the mentioned hedge accounting, fair value loss before taxes amounting to TL 247,973 are accounted for under equity during the current period (December 31, 2018 – TL 37,446 gain). The amounts for the ineffective portion of revenues in the amount of TL 182 gain is associated with the income statement (December 31, 2018 – TL 795 gain).

As of the balance sheet date, swaps with a nominal amount of USD 2,529 million (December 31, 2018 – USD 2,519 Million) have been subject to hedge accounting with USD deposits and swaps with a nominal amount of EUR 104 million (December 31, 2018 – EUR 289 million) have been subject to hedge accounting with Euro deposits. As a result of above mentioned hedge accounting, fair value loss before taxes amounting to TL 790,817 are accounted under equity during the current period (December 31, 2018 – TL 181,006 gain). The loss amounting to TL 1,525 (December 31 2018 – TL 1,302 gain) relating to the ineffective portion is accounted under at the income statement.

When the fair value hedge accounting cannot be effectively continued as stated in IFRS 9, the fair value hedge accounting is ceased. Effective parts classified under equity due to hedge accounting are amortized through the income statement until the maturity of swaps in case of ineffectiveness at periods when the expected cash flows subject to hedge accounting affect profit or loss (as in periods when interest income or expense is recognized). In the current period there is gain of TL 20,045 transferred amount from equity to income statement due to ineffectiveness or matured swaps (December 31, 2018 – TL 4,969 loss).

Subordinated Loans:

The Parent Bank applies cash flow hedge accounting using interest rate swaps in order to hedge its subordinated loans which have floating interest payment. The Bank implements efficiency tests at the balance sheet dates for hedging purposes; the effective portions are accounted for under equity "Hedging Funds", whereas the ineffective portions are accounted for at income statement as defined in IFRS 9. As at the balance sheet date, swaps amounting to USD 485 million are subject to hedge accounting as hedging instruments (December 31, 2018 – USD 810 million). As a result of the mentioned hedge accounting, fair value loss before taxes amounting to TL 94,034 are accounted for under equity during the current period (December 31, 2018 – TL 6,909 loss). There is loss amount to TL 390 related to the ineffective portion(December 31, 2018 – TL 83 loss).

On the other hand; accounting application is terminated when cash flow hedge accounting is not effectively maintained as defined in IAS 39. The effective amounts classified under equity due to hedge accounting are reclassified into profit or loss as the reclassification adjustments during periods or periods when the estimated cash flows subject to hedging in case of deterioration of the event affect profit or loss (such as the periods when interest income or expense is accounted for). In this context; In the current year, the Bank ended the hedge accounting practice of the USD 325 million subordinated loan it used for the purpose of hedging cash flow due to the change in the contract conditions. Due to hedge accounting practices terminated in the current year, a loss amounting to TL 4,568 (December 31, 2018 – None) was transferred from the equity to the income statement

As of December 31, 2019, the above mentioned cash flow hedge transactions were effective.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

Derivative financial instruments (continued)

Funds Borrowed:

Subsidiary QNB Finans Finansal Kiralama A.Ş. applies cash flow hedge accounting through interest rate swaps to hedge its interest rate fluctuations on floating rate foreign currency denominated loans. The Company applies efficiency tests for hedge accounting at each balance sheet date and the effective portions are accounted for under the "Interest Protection Funds" account item under equity under the financial statements as defined in IAS 39 and the amount related to the ineffective portion is associated with the income statement. As of the balance sheet date, swaps amounting to TL 419,434 (December 31, 2018 – TL 442,239) are subject to risk protection accounting as a hedge of risk. As a result of the related hedge accounting, fair value loss of TL 1,628 (December 31, 2018 – 753 gain) before tax is recognized under equity in the current period. The income amounting to TL 427 for the ineffective portion is associated with the income statement (December 31, 2018- TL 7,293 gain).

The measurements as of December 31, 2019, hedge of cash flow transactions stated above are determined as effective.

Fair value hedge accounting:

Loans:

The Parent Bank enters into swap transactions in order to hedge itself from the changes in the fair value due to the changes in market interest rates of a certain portion of its long-term loans and applies fair value hedge accounting as per IFRS 9. As of the balance sheet date; the mortgage loans amounting to TL 8,127,097 (December 31, 2018 – TL 6,055,337) were subject to hedge accounting by swaps with a nominal of TL 6,608,353 (December 31, 2018 – TL 6,922,598). On December 31, 2019 the net market valuation difference gain amounting to TL 55,574 (December 31,2018 – TL 1,576 loss) due to the gain from the loans amounting to TL 919,613 (December 31, 2018 – TL 173,133 loss) and loss from swaps amounting to TL 864,039 (December 31, 2018 – TL 171,750 gain) is accounted for under "gain / (loss) from financial derivatives transactions" line in the accompanying financial statements.

As of June 30, 2019, the Parent Bank ended its hedge accounting that it has been applying for the purpose of hedging the fair value risk in relation to the project financing loan it has extended in foreign currency in previous periods. According to this; in the loans item of the balance sheet, fair value difference income amounting to TL 26,339 is accounted for and the fair value difference amount is amortized over the term of the loan subject to hedging transaction.

When the fair value hedge accounting cannot be effectively continued as stated in IFRS 9, the fair value hedge accounting is ceased. The fair value differences of the hedged loans are amortized through the income statement until the maturity of the hedged loans. The Bank has booked the valuation effect amounting to TL 136,590 (December 31, 2018 - TL 51,313 gain) related to the loans that are ineffective for hedge accounting under "gain / (loss) from financial derivatives transactions" as loss during the current period.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

Derivative financial instruments (continued)

Investment securities FVOCI:

The Parent Bank applies fair value hedge accounting to hedge itself against the changes in the interest rates related to long term foreign currency Eurobonds with fixed coupon held by the Parent Bank using swaps as hedging instruments. As at the balance sheet date; Eurobonds with a nominal of USD 373,663 million and EUR 49,8 million (December 31, 2018 – USD 404.7 million and EUR 75.4 million) were subject to hedge accounting by interest rate swaps with the same nominal value. On December 31, 2019, the net market valuation difference gain amounting to TL 695 due to gain from Eurobonds amounting to TL 215,945 (December 31, 2018 – TL 6,814 loss) and loss from swaps amounting to TL 215,250 (December 31, 2018 – TL 6,826 gain) is accounted for under "gain / (loss) from financial derivatives transactions" line in the accompanying financial statements. The Parent Bank does not apply fair value hedge on TL government bonds in the current period (December 31, 2018 – None).

Bonds issued:

The Parent Bank applies fair value hedge accounting to hedge itself against the changes in the interest rates related to the foreign currency bonds issued using interest rate swaps as hedging instruments. As of the balance sheet date, bonds with nominal amount of USD 780 million (December 31, 2018 – USD 283 Million) have been subject to hedge accounting with the same nominal amount of swaps. As of December 31, 2019, TL 38 net fair valuation difference gain, net of TL 69,763 (December 31, 2018 – TL 1,142 gain) loss from issued bonds and TL 69,801 (December 31, 2018 – TL 1,321 loss) gain from swaps, have been recorded under "Gain / (loss) from financial derivatives transactions" on accompanying financial statements.

Borrowings:

The Parent Bank implements fair value hedge accounting through interest swaps aiming to provide hedging from changes in interest rates related to fixed rate foreign exchange credits used. Credit at an amount of EUR 30 million (December 31, 2018- EUR 30 million) is subjected to hedge accounting with a swap having the same amount. As of December 31, 2019, a net mark to market difference loss at an amount of TL 10 (December 31, 2018- TL 11 loss) sourcing from loss at an amount of TL 324 (December 31, 2018 – TL 1,239 loss) from aforementioned credit and gain at an amount of TL 314 (December 31, 2018 – TL 1,228 gain) from swaps is recognized under "Gain/Loss from Derivative Financial Transactions."

QNB Finans Finansal Kiralama AŞ., the subsidiary of The Parent Bank, implements fair value hedge accounting through interest swaps aiming to provide hedging from changes in interest rates related to fixed rate TL credits used. Credit at an amount of TL 429,842 (December 31, 2018 – TL 49,988) is subjected to hedge accounting with a swap having the same amount. A net mark to market difference gain at an amount of TL 58 (December 31, 2018 – TL 28 net mark to market difference gain) sourcing from loss at an amount of TL 7,384 (December 31, 2018 – TL 467loss) from aforementioned credit and gain at an amount of TL 7,442 (December 31, 2018 – TL 495 gain) from swaps is recognized under "Gain/Loss from Derivative Financial Transactions."

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

23 Loans and advances to customers

		D	ecember 31, 2019	Deceml	oer 31, 2018
Loans and advances to customers at FVTP	L		86,838		110,032
Loans and advances to customers at amorti	zed cost		109,359,090		93,357,493
Total			109,445,928	· ·	93,467,525
December 31, 2019	Corporate	Consumer	Credit Cards	Mortgage	Total
Loans and advances to customers - Stage 1	61,310,419	16,687,133	14,835,816	4,488,508	97,321,876
Loans and advances to customers - Stage 2	8,459,954	1,723,471	1,750,768	275,108	12,209,301
Loans and advances to customers - Stage 3	5,600,240	1,311,497	1,368,450	32,293	8,312,480
Total Gross	75,370,613	19,722,101	17,955,034	4,795,909	117,843,657
Expected credit loss on loans and advances to					
customers	(5,587,338)	(1,323,929)	(1,475,342)	(11,120)	(8,397,729)
Loans and advances to customers	69,783,275	18,398,172	16,479,692	4,784,789	109,445,928
December 31, 2018	Corporate	Consumer	Credit Cards	Mortgage	Total
Loans and advances to customers - Stage 1	53,939,208	13,319,329	12,662,765	4,764,650	84,685,952
Loans and advances to customers - Stage 2	6,695,836	1,615,631	1,414,877	314,294	10,040,638
Loans and advances to customers - Stage 3	3,762,991	1,114,654	1,296,588	19,318	6,193,551
Total Gross	64,398,035	16,049,614	15,374,230	5,098,262	100,920,141
Expected credit loss on loans and advances to					
customers	(4,573,093)	(1,263,332)	(1,604,776)	(11,415)	(7,452,616)
Loans and advances to customers	59,824,942	14,786,282	13,769,454	5,086,847	93,467,525
	C	C	Caralla Caralla	Mantaga	T-4-1
December 31, 2019	Corporate	Consumer	Credit Cards	Mortgage	Total
Neither past due nor impaired	67,036,978	16,881,641	15,110,430	4,283,531	103,312,580
Past due not impaired	2,733,375	1,528,963	1,476,174	480,085	6,218,597
Impaired	5,600,240	1,311,497	1,368,450	32,293	8,312,480
Total Gross	75,370,593	19,722,101	17,955,054	4,795,909	117,843,657
Expected credit loss on loans and advances to	(5,587,338)	(1,323,929)	(1,475,342)	(11,120)	(8,397,729)
customers		18,398,172	16,479,712		109,445,928
Loans and advances to customers	69,783,255	10,390,172	10,479,712	4,784,789	109,445,926
December 31, 2018	Corporate	Consumer	Credit Cards	Mortgage	Total
Neither past due nor impaired	58,208,137	12,987,369	12,582,702	4,470,905	88,249,113
Past due not impaired	2,426,907	1,947,591	1,494,940	608,039	6,477,477
Impaired	3,762,991	1,114,654	1,296,588	19,318	6,193,551
Total Gross	64,398,035	16,049,614	15,374,230	5,098,262	100,920,141
Expected credit loss on loans and advances to					
customers	(4,573,093)	(1,263,332)	(1,604,776)	(11,415)	(7,452,616)
Loans and advances to customers	59,824,942	14,786,282	13,769,454	5,086,847	93,467,525

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

23 Loans and advances to customers (continued)

Movements in the allowance for impairment on loans and advances to customers are as follows:

2019	Corporate	Consumer	Credit Cards	Mortgage	Total
Balance at December 31, 2018 Impairment losses on loans and advances to	4,573,093	1,263,332	1,604,776	11,415	7,452,616
customers	1,363,259	298,221	213,174	(295)	1,874,359
Loans written off / Sales	(349,014)	(237,624)	(342,608)		(929,246)
Balance at December 31, 2019	5,587,338	1,323,929	1,475,342	11,120	8,397,729
2018	Corporate	Consumer	Credit Cards	Mortgage	Total
Balance at January 1	2,125,055	807,710	1,003,211	8,056	3,944,032
IFRS 9 Impact	1,085,619	254,255	203,242	5,218	1,548,334
Balance at January 1, 2018 Impairment losses on loans and advances to	3,210,674	1,061,965	1,206,453	13,274	5,492,366
customers	1,468,541	203,543	400,239	(1,859)	2,070,464
Loans written off / Sales	(106,122)	(2,176)	(1,916)		(110,214)
Balance at December 31	4,573,093	1,263,332	1,604,776	11,415	7,452,616

The write-offs and recoveries by categories are as follows:

	12 month period ended December 31,		
	2019	2018	
Write-offs ^(*)			
Credit cards	342,608	1,916	
Mortgage and consumer loans	237,624	2,176	
Corporate loans ^(**)	349,014	106,122	
Total write-offs	929,246	110,214	
Recoveries			
Credit cards	73	56	
Mortgage and consumer loans	175	169	
Corporate loans	742	2,587	
Total recoveries made from loans that were written-off	990	2,812	

^(*) The Bank sold TL 959,700 of its NPL portfolio for TL 88,200. TL 41,182 of the sold amount of consists of the expenses of the portfolio sold in previous periods and the collections made during the sales process. (December 31, 2018 – None).

^(**)Within the context of the existing loan agreements, all creditors including the Bank have reached an agreement on restructuring the loans granted to Ojer Telekomünikasyon A.Ş. (OTAŞ), who is the main shareholder of Türk Telekomünikasyon A.Ş. (Türk Telekom). It is contemplated that Türk Telekom's number of 192.500.000.000 A group shares owned by OTAŞ, representing 55% of its issued share capital corresponding to A group shares have been pledged as a guarantee for the existing facilities would be taken over by a special purpose entity which is incorporated or will be incorporated in the Turkish Republic, and owned by directly or indirectly by all creditors. As a result of the transfer of this liability, the risk balance amounting to TL 106.122 has been left out of the balance sheet and all legal and administrative permissions have been taken and the restructured risk balance as of December 31, 2018 has been started to be followed as financial assets at fair value through profit or loss in accordance with IFRS 9.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

23 Loans and advances to customers (continued)

Aging analysis of past due but not impaired loans and advances to customers per class of customers:

	Less than			
December 31, 2019	30 days	31-60 days	61-90 days	Total
Corporate	1,220,031	733,447	779,895	2,733,373
Consumer	1,176,265	284,810	67,888	1,528,963
Credit cards	1,208,296	200,934	66,945	1,476,175
Mortgage	314,156	116,927	49,003	480,086
Total	3,918,748	1,336,118	963,731	6,218,597
	Less than			
December 31, 2018	30 days	31-60 days	61-90 days	Total
Corporate	896,859	827,407	702,641	2,426,907
Consumer	1,473,251	377,941	96,399	1,947,591
Credit cards	1,111,889	288,226	94,825	1,494,940
Mortgage	413,074	148,747	46,218	608,039
Total	3,895,073	1,642,321	940,083	6,477,477

The table below shows the credit quality and the maximum exposure to credit risk based on the internal credit rating system and year-end stage classification.

_	December 31, 2019							
Internal Rating Grade	Stage 1	Stage 2	Stage 3	Total				
High grade	1,796,328	5,594	-	1,801,922				
Standard grade	2,867,830	10,100	-	2,877,930				
Sub-Standard grade	90,640,300	7,992,428	-	98,632,728				
Past due but not impared	2,017,418	4,201,179	-	6,218,597				
Non-performing	-	-	8,312,480	8,312,480				
Total	97,321,876	12,209,301	8,312,480	117,843,657				

_	December 31, 2018							
Internal Rating Grade	Stage 1	Stage 2	Stage 3	Total				
High grade	2,320,484	9,862	-	2,330,346				
Standard grade	3,936,580	17,974	-	3,954,554				
Sub-Standard grade	76,328,137	5,636,076	-	81,964,213				
Past due but not impared	2,100,751	4,376,726	-	6,477,477				
Non-performing	-	-	6,193,551	6,193,551				
Total	84,685,952	10,040,638	6,193,551	100,920,141				

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

23 Loans and advances to customers (continued)

The table below shows the changes in the gross carrying amount and the corresponding ECL allowances.

		December 3	31 2010	
-	Stage 1	Stage 2	Stage 3	Total
Gross carrying amount as January 1, 2019	84,685,952	10,040,638	6,193,551	100,920,141
New assets originated or purchased	47,384,753	305,367	0,173,331	47,690,120
Assets derecognised or repaid (excluding write offs)	(29,422,880)	(876,808)	(2,238,988)	(32,538,676)
Transfers to Stage 1	1,335,268	(1,335,268)	(2,230,300)	(32,330,070)
Transfers to Stage 2	(9,006,856)	9,006,856	_	_
Transfers to Stage 3	-	(5,287,163)	5,287,163	_
Changes to contractual cash flows due to modifications not		(=,==:,===)	-,,	
resulting in derecognition	_	_	_	_
Amounts written off	_	_	(929,246)	(929,246)
Foreign exchange adjustments	2,345,639	355,679	-	2,701,318
Total	97,321,876	12,209,301	8,312,480	117,843,657
_		December 3		
	Stage 1	Stage 2	Stage 3	Total
Gross carrying amount as January 1, 2018	75,414,516	6,302,983	4,340,030	86,057,529
New assets originated or purchased	36,767,004	167,825	-	36,934,829
Assets derecognised or repaid (excluding write offs)	(25,636,188)	(590,099)	(1,311,139)	(27,537,426)
Transfers to Stage 1	1,251,403	(1,251,403)	-	-
Transfers to Stage 2	(7,991,498)	7,991,498	-	-
Transfers to Stage 3	-	(3,274,874)	3,274,874	-
Changes to contractual cash flows due to modifications not				
resulting in derecognition	-	-	-	-
Amounts written off	-	-	(110,214)	(110,214)
Foreign exchange adjustments	4,880,715	694,708	-	5,575,423
Total	84,685,952	10,040,638	6,193,551	100,920,141
<u>-</u>		December 3	31, 2019	
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at January 1, 2019	1,064,926	1,628,659	4,759,031	7,452,616
Transfers to Stage 1	-	-	-	-
Transfers to Stage 2	(931,820)	931,820	-	-
Transfers to Stage 3	_	(2,453,489)	2,453,489	-
Impairment allowance for the period, net	749,088	1,354,162	(319,745)	1,783,505
Amounts written off	-	-	(929,246)	(929,246)
Foreign exchange adjustments	25,345	65,509	-	90,854
Total	907,539	1,526,661	5,963,529	8,397,729
		December 3	81 2018	
-	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at January 1, 2018	1,007,878	1,103,098	3,381,390	5,492,366
Transfers to Stage 1	-	-	5,501,570	5,172,500
Transfers to Stage 2	(1,052,399)	1,052,399	_	_
Transfers to Stage 3	(1,002,000)	(1,512,664)	1,512,664	_
Impairment allowance for the period, net	1,052,898	804,072	(24,809)	1,832,161
Amounts written off	-,002,000		(110,214)	(110,214)
Foreign exchange adjustments	56,549	181,754	-	238,303
Total	1,064,926	1,628,659	4,759,031	7,452,616

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

23 Loans and advances to customers (continued)

The following tables provide a summary of the Group's forborne assets as of December 31, 2019.

			Sta	ige 2		Stage 3					
	Gross carrying amount	Temporary Modification to T&Cs	Permanent Modification to T&Cs	Refinancing	Total performing forborne loans	Temporary Modification to T&Cs		Refinancing	Total non- performing forborne loans	Total forborne loans	Forbearance
Corporate lending	75,370,593	-	263,755	5,518,264	5,782,019	-	-	70,697	70,697	5,852,716	7.77%
Consumer lending	19,722,101	-	275,408	802,985	1,078,393	-	-	-	-	1,078,393	5.47%
Credit Cards	17,955,054		-	788,448	788,448	-	-	-	-	788,448	4.39%
Residential mortgages	4,795,909	-	628	38,101	38,729	-	-	-	-	38,729	0.81%
Total	117,843,657	-	539,791	7,147,798	7,687,589		-	70,697	70,697	7,758,286	6.58%

	Gross amou	nt of forborne	oans	ECLs of forborne loans				
	Stage 2	Stage 3	Total	Stage 2 Individual	Stage 2 Collective	Stage 3 Individual	Stage 3 Collective	Total
Corporate lending	5,782,019	70,697	5,852,716	1,016,432	-	39,921	-	1,056,353
Consumer lending	1,078,393	-	1,078,393	83,361	-	-	-	83,361
Credit Cards	788,448	-	788,448	71,742	-	-	-	71,742
Residential mortgages	38,729	-	38,729	186	-	-	-	186
	-	-	-	-	-	-	-	-
Total	7,687,589	70,697	7,758,286	1,171,721	-	39,921	-	1,211,642

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

23 Loans and advances to customers (continued)

The following tables provide a summary of the Group's forborne assets as of December 31, 2018.

			Stage 2 Stage 3								
	Gross carrying amount	Temporary Modification to T&Cs	Permanent Modification to T&Cs	Refinancing	Total performing forborne loans	Temporary Modification to T&Cs		Refinancing	Total non- performing forborne loans	Total forborne loans	Forbearance ratio
Corporate lending	64,398,035	-	335,110	2,536,392	2,871,502	-	-	91,417	91,417	2,962,919	4.60%
Consumer lending	16,049,614	-	8,162	780,203	788,365	-	-	-	-	788,365	4.91%
Credit Cards	15,374,230		-	606,521	606,521	-	-	-	-	606,521	3.95%
Residential mortgages	5,098,262	-	2,804	28,378	31,182	-	-	-	-	31,182	0.61%
Total	100,920,141	-	346,076	3,951,494	4,297,570		-	91,417	91,417	4,388,987	4.35%

	Gross amou	nt of forborne l	oans	ECLs of forborne loans				
	Stage 2	Stage 3	Total	Stage 2 Individual	Stage 2 Collective	Stage 3 Individual	Stage 3 Collective	Total
Corporate lending	2,871,502	91,417	2,962,919	916,785	-	50,696	-	967,481
Consumer lending	788,365	-	788,365	52,559	-	-	-	52,559
Credit Cards	606,521	-	606,521	53,740	-	-	-	53,740
Residential mortgages	31,182	-	31,182	208	-	-	-	208
Total	4,297,570	91,417	4,388,987	1,023,292	-	50,696	-	1,073,988

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23 Loans and advances to customers (continued)

The table below shows the type of collateral.

December 31, 2019	Corporate	Consumer	Credit Cards	Mortgage	Total
Cash and securities	6,973,573	523,738			7,497,311
Mortgages	29,032,482	100,495	-	4,795,909	33,928,886
Other tangible collaterals	15,530,644	5,617	-	-	15,536,261
Unsecured	23,833,894	19,092,251	17,955,054	-	60,881,199
Total	75,370,593	19,722,101	17,955,054	4,795,909	117,843,657

December 31, 2018	Corporate	Consumer	Credit Cards	Mortgage	Total
Cash and securities	6,448,025	321,494	-		6,769,519
Mortgages	24,440,927	198,466	-	5,098,262	29,737,655
Other tangible collaterals	15,079,292	4,381	-	-	15,083,673
Unsecured	18,429,791	15,525,273	15,374,230	-	49,329,294
Total	64,398,035	16,049,614	15,374,230	5,098,262	100,920,141

Loans and advances to customers at fair value through profit or loss

Loans and advances to customers of the retail banking business have been designated at fair value through profit or loss, as the Group manages these loans and advances to customers on a fair value basis in accordance with its investment strategy. Internal reporting and performance measurement of these loans and advances to customers are on a fair value basis.

The cumulative change in the fair value of these loans and advances to customers is set out below:

	December 31, 2019	December 31, 2018
Loans and advances at FVTPL	23,194	(100,082)

24 Factoring receivables

	December 31, 2019	December 31, 2018
Not later than 1 year	1,608,316	1,176,996
Later than 1 year	106,149	106,878
Factoring receivables, gross	1,714,465	1,283,874
Less: Impairment losses on factoring receivables	(83,938)	(74,990)
Total	1,630,527	1,208,884

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24 Factoring receivables (continued)

The table below shows the credit quality and the maximum exposure to credit risk based on the internal credit rating system and year-end stage classification.

	December 31, 2019			
Internal Rating Grade	Stage 1	Stage 2	Stage 3	Total
High grade	1,557,183	79,130	-	1,636,313
Standard grade	-	-	-	-
Sub-Standard grade	-	-	-	-
Past due but not impared	-	617	-	617
Non-performing	-	-	77,535	77,535
Individually impaired	-	-	-	-
Total	1,557,183	79,747	77,535	1,714,465

	December 31, 2018				
Internal Rating Grade	Stage 1	Stage 2	Stage 3	Total	
High grade	1,102,365	98,512	-	1,200,877	
Standard grade	-	-	-	-	
Sub-Standard grade	-	-	-	-	
Past due but not impared	-	7,355	-	7,355	
Non-performing	-	-	75,642	75,642	
Individually impaired	-	-	-	-	
Total	1,102,365	105,867	75,642	1,283,874	

The table below shows the changes in the gross carrying amount and the corresponding ECL allowances.

	December 31, 2019			
	Stage 1	Stage 2	Stage 3	Total
Gross carrying amount as January 1, 2019	1,102,358	105,867	75,642	1,283,867
New assets originated or purchased	4,783,595	-	-	4,783,595
Assets derecognised or repaid (excluding write offs)	(4,238,349)	(100,836)	(22,716)	(4,361,901)
Transfers to Stage 1	-	-	-	-
Transfers to Stage 2	(87,999)	87,999	-	_
Transfers to Stage 3	(2,422)	(22,187)	24,609	-
Changes to contractual cash flows due to				
modifications not resulting in derecognition	-	8,904	-	8,904
Amounts written off	-	-	-	-
Foreign exchange adjustments	-	-	-	-
Total	1,557,183	79,747	77,535	1,714,465

	December 31, 2018			
	Stage 1	Stage 2	Stage 3	Total
Gross carrying amount as January 1, 2018	1,332,780	46,536	48,457	1,427,773
New assets originated or purchased	4,697,000	-	-	4,697,000
Assets derecognised or repaid (excluding write offs)	(4,795,127)	(24,060)	(22,278)	(4,841,465)
Transfers to Stage 1	-	_	_	_
Transfers to Stage 2	(119,898)	119,898	-	-
Transfers to Stage 3	(9,869)	(39,594)	49,463	-
Changes to contractual cash flows due to				
modifications not resulting in derecognition	-	3,087	-	3,087
Amounts written off	-	-	-	-
Foreign exchange adjustments	(2,528)	-	-	(2,528)
Total	1,102,358	105,867	75,642	1,283,867

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24 Factoring receivables (continued)

	December 31, 2019			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at January 1, 2019	4,758	2,768	67,464	74,990
Transfers to Stage 1	-	-	-	-
Transfers to Stage 2	(257)	257	-	-
Transfers to Stage 3	(10)	(741)	751	-
Impairment allowance for the period, net	3,038	5,155	755	8,948
Amounts written off	<u>-</u>	-	-	-
Foreign exchange adjustments	-	-	-	-
Total	7,529	7,439	68,970	83,938

	December 31, 2018			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at January 1, 2018	7,451	1,876	41,793	51,120
Transfers to Stage 1	-	-	-	-
Transfers to Stage 2	(1,898)	1,898	-	-
Transfers to Stage 3	(795)	(471)	1,266	-
Impairment allowance for the period, net	_	(535)	24,405	23,870
Amounts written off	-	_	-	-
Foreign exchange adjustments	-	-	-	-
Total	4,758	2,768	67,464	74,990

25 Finance lease receivables

	December 31, 2019	December 31, 2018
Not later than 1 year	2,492,021	2,302,688
Later than 1 year but not later than 5 years	4,155,844	4,096,049
Later than 5 years	199,119	365,015
Finance lease receivables, gross	6,846,984	6,763,752
Unearned future finance income on finance leases	(1,039,506)	(1,062,456)
Net investment in finance leases	5,807,478	5,701,296
Less: expected credit losses on finance lease receivables	(224,333)	(180,220)
Finance lease receivables	5,583,145	5,521,076

The net investment in finance lease receivables is analyzed as follows:

	December 31, 2019	December 31, 2018
Not later than 1 year	2,023,918	1,872,742
Later than 1 year but not later than 5 years	3,598,975	3,492,233
Later than 5 years	184,585	336,321
Total	5,807,478	5,701,296

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

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25 Finance lease receivables (continued)

The Movements in expected credit losses on finance lease receivables are as follows:

	December 31, 2019	December 31, 2018
Balance at January 1	(180,220)	(81,869)
IFRS 9 opening effect	-	(49,027)
Expected credit losses on finance lease receivables (Note 15)	(88,994)	(87,686)
Receivables written off ^(*)	44,881	38,362
Balance at December 31	(224,333)	(180,220)

^(*) The Company has sold its finance lease receivables amounting to TL 44,881 to an asset management company. Therefore such receivables were written off in the accompanying financial statements (December 31, 2018: TL 38,362).

Finance lease receivables

	December 31, 2019	December 31, 2018
Neither past due nor impaired	4,928,969	4,598,506
Past due not impaired	537,024	757,720
Impaired	341,485	345,070
Total Gross	5,807,478	5,701,296
Less: impairment losses on finance lease receivables	(224,333)	(180,220)
Finance lease receivables	5,583,145	5,521,076

As of December 31, 2019 and 2018, the aging analysis of past due but not impaired finance lease receivables are as follows:

	December 31, 2019	December 31, 2018
Between 1-30 days	237,913	372,385
Between 1-3 months	299,111	385,335
Between 3-12 months	-	-
Between 1-5 years		
Total	537,024	757,720

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25 Finance lease receivables (continued)

The table below shows the credit quality and the maximum exposure to credit risk based on the internal credit rating system and year-end stage classification.

	December 31, 2019			
Internal Rating Grade	Stage 1	Stage 2	Stage 3	Total
High grade	145,049	-	-	145,049
Standard grade	1,520,208	-	-	1,520,208
Sub-Standard grade	2,999,695	264,017		3,263,712
Past due but not impared	179,082	357,942	-	537,024
Non-performing	=	-	341,485	341,485
Total	4,844,034	621,959	341,485	5,807,478

<u></u>	December 31, 2018			
Internal Rating Grade	Stage 1	Stage 2	Stage 3	Total
High grade	115,592	-	-	115,592
Standard grade	1,337,758	-	-	1,337,758
Sub-Standard grade	2,864,815	170,661	-	3,035,476
Past due but not impared	398,625	468,775	-	867,400
Non-performing	=	-	345,070	345,070
Total	4,716,790	639,436	345,070	5,701,296

The table below shows the changes in the gross carrying amount and the corresponding ECL allowances.

	December 31, 2019			
	Stage 1	Stage 2	Stage 3	Total
Gross carrying amount as January 1, 2019	4,716,790	639,436	345,070	5,701,296
New assets originated or purchased	1,002,003	-	-	1,002,003
Assets derecognised or repaid (excluding write offs)	(256,560)	(41,498)	(5,223)	(303,281)
Transfers to Stage 1	151,786	(108,524)	(43,262)	-
Transfers to Stage 2	(267,002)	271,862	(4,860)	-
Transfers to Stage 3	(35,584)	(81,181)	116,765	-
Changes to contractual cash flows due to modifications not	-	-	-	-
resulting in derecognition				
Amounts written off	-	-	(44,881)	(44,881)
Foreign exchange adjustments	(467,399)	(58,136)	(22,124)	(547,659)
Total	4,844,034	621,959	341,485	5,807,478

		December 3	31, 2018	
	Stage 1	Stage 2	Stage 3	Total
Gross carrying amount as January 1, 2018	4,118,570	279,649	163,317	4,561,536
New assets originated or purchased	862,197	-	-	862,197
Assets derecognised or repaid (excluding write offs)	(676,170)	(58,461)	(17,145)	(751,776)
Transfers to Stage 1	73,589	(73,489)	(100)	-
Transfers to Stage 2	(482,627)	484,364	(1,737)	-
Transfers to Stage 3	(80,310)	(99,660)	179,970	-
Changes to contractual cash flows due to modifications not				
resulting in derecognition	-	-	-	-
Amounts written off	-	-	(38,362)	(38,362)
Foreign exchange adjustments	901,541	107,033	59,127	1,067,701
Total	4,716,790	639,436	345,070	5,701,296

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25 Finance lease receivabes (continued)

	December 31, 2019			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at January 1, 2019	6,070	63,474	110,676	180,220
Transfers to Stage 1	5,604	(5,575)	(29)	-
Transfers to Stage 2	(844)	1,447	(603)	-
Transfers to Stage 3	(187)	(12,675)	12,862	
Impairment allowance for the period, net	626	16,301	67,685	84,612
Amounts written off	-	-	(44,881)	(44,881)
Foreign exchange adjustments	620	1,645	2,117	4,382
Total	11,889	64,617	147,827	224,333

	December 31, 2018			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at January 1, 2019	5,359	26,833	98,706	130,898
Transfers to Stage 1	710	(710)	-	-
Transfers to Stage 2	(586)	1,013	(427)	-
Transfers to Stage 3	(125)	(13,159)	13,284	-
Impairment allowance for the period, net	(404)	44,873	32,249	76,718
Amounts written off	-	-	(38,362)	(38,362)
Foreign exchange adjustments	1,116	4,624	5,226	10,966
Total	6,070	63,474	110,676	180,220

26 Investments measured at fair value through other comprehensive income (FVOCI)

	December 31, 2019	December 31, 2018
Financial assets at FVOCI:		
Turkish government bonds and treasury bills	12,129,453	8,305,909
Corporate bonds	24,191	19,976
Debt securities	12,153,644	8,325,885
Equity shares	198,634	125,869
Total Financial assets at FVOCI	12,352,278	8,451,754

The movements of FVOCI investments are summarized as follows:

	2019	2018
Balance at January 1	8,451,754	8,353,636
IFRS 9 opening effect	· -	(1,675,150)
Additions within the year	6,525,366	2,249,770
Foreign exchange differences	686,929	1,091,579
Disposals (sale and redemption) within the year	(3,797,849)	(1,154,932)
Amortisation of premiums/discounts	142,963	(104,524)
Gains / (losses) from changes in fair value	304,935	(415,004)
Accrual	38,180	106,379
Balance at December 31	12,352,278	8,451,754

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

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27 Investments measured at amortized cost

	December 31, 2019	December 31, 2018
Investments at amortised cost:		
Turkish government bonds and treasury bills	15,314,036	11,886,832
Corporate bonds	855,414	1,008,284
Debt securities	16,169,450	12,895,116
Total financial assets at amortised cost	16,169,450	12,895,116

As of December 31, 2019, an amount of TL 11,852 (December 31, 2018– TL 37,077) provision was provided for the investments measured at amortized cost investments due to the adoption of IFRS 9.

The movements in the amortized cost investments are summarized as follows:

	2019	2018
Balance at January 1	12,895,116	7,168,664
IFRS 9 openning effect	-	1,777,506
Additions during the year	2,628,259	2,163,995
Foreign exchange differences	790,412	1,333,014
Disposals (redemption) during the year	(1,496,516)	(815,934)
Amortisation of premiums/discounts	1,273,176	1,175,499
Accruals	79,003	92,372
Balance at December 31	16,169,450	12,895,116

The table below shows the fair value of the Group's debt instruments measured at FVOCI and amortised cost by credit risk, based on the Group's internal credit rating system and year-end stage classification.

	1	December 31,	2019	
Internal Rating Grade	Stage 1	Stage 2	Stage 3	Total
High grade	28,533,581			28,533,581
Standard grade	-	-	-	-
Sub-Standard grade	-	-	-	-
Past due but not impared	-	-	-	-
Non-performing	-	-	-	-
Individually impaired	-	-	-	-
Total	28,533,581	-	-	28,533,581

		December 31,	2018	
Internal Rating Grade	Stage 1	Stage 2	Stage 3	Total
High grade	21,383,947	-	-	21,383,947
Standard grade	-	-	-	-
Sub-Standard grade	-	=	-	-
Past due but not impared	-	-	-	-
Non-performing	-	-	-	-
Individually impaired	-	=	-	-
Total	21,383,947	-	-	21,383,947

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27 Investments measured at amortized cost (continued)

The table below shows the changes in the gross carrying amount and the corresponding ECL allowances.

	December 31, 2019			
	Stage 1	Stage 2	Stage 3	Total
Gross carrying amount as January 1, 2019	21,383,947	-	-	21,383,947
New assets originated or purchased	8,828,160	-	-	8,828,160
Assets derecognised or repaid (excluding write offs)	(1,678,526)	-	-	(1,678,526)
Transfers to Stage 1	-	-	-	=
Transfers to Stage 2	-	-	-	=
Transfers to Stage 3	-	-	-	=
Changes to contractual cash flows due to modifications				
not resulting in derecognition	-	-	-	=
Amounts written off	-	-	-	=
Foreign exchange adjustments	-	-	-	_
Total	28,533,581	-	-	28,533,581

	December 31, 2018			
	Stage 1	Stage 2	Stage 3	Total
Gross carrying amount as January 1, 2018	15,624,655	-	-	15,624,655
New assets originated or purchased	6,690,099	-	-	6,690,099
Assets derecognised or repaid (excluding write offs)	(930,807)	-	-	(930,807)
Transfers to Stage 1	-	-	-	-
Transfers to Stage 2	-	-	-	-
Transfers to Stage 3	-	-	-	-
Changes to contractual cash flows due to modifications				
not resulting in derecognition	-	-	-	-
Amounts written off	-	-	-	-
Foreign exchange adjustments	-	-	-	-
Total	21,383,947	-	-	21,383,947

	December 31, 2019			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at January 1, 2019	56,569	-	-	56,569
Transfers to Stage 1	-		-	-
Transfers to Stage 2	-	-	-	-
Transfers to Stage 3	-		-	-
Impairment allowance for the period, net	(42,759)	-	-	(42,759)
Amounts written off	-	-	-	_
Foreign exchange adjustments	=	-	-	-
Total	13,810	-	-	13,810

	December 31, 2018			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at January 1, 2018	25,951	-	-	25,951
Transfers to Stage 1	-	-	-	-
Transfers to Stage 2	-	-	-	_
Transfers to Stage 3	-	-	-	-
Impairment allowance for the period, net	30,618	-	-	30,618
Amounts written off	-	-	-	_
Foreign exchange adjustments	-	-	-	-
Total	56,569	-	-	56,569

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

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28 Investments in joint ventures

	2019	2018
Balance at January 1	158,380	135,381
Additions	-	-
Group's share of profit/(loss) of joint ventures	89,429	48,669
Dividends received	(48,425)	(25,670)
Balance at December 31	199,384	158,380

The Group's joint ventures are as follows:

			% of partic	ipation
Name of joint ventures	Principal activity	Place of incorporation and operation	December 31, 2019	December 31, 2018
Bantaş Nakit ve Kıymetli Mal Taşıma ve Güvenlik Hizmetleri A.Ş. Cigna Finans Pension Fund (Cigna	Security Services Pension	Turkey	33.33%	33.33%
Finans)	Fund	Turkey	49.00%	49.00%

The above joint ventures are accounted for using the equity method in these consolidated financial statements.

Summarised financial information in respect of the Group's material joint venture Cigna Finans is set out below:

	December 31	•
Cigna Finans	2019	2018
Current Assets	679,580	540,928
Non-current assets	31,358	19,570
Current liabilities	236,956	212,501
Non-current liabilities	223,047	163,352
Equity	250,935	184,645
Cash and cash equivalents	569,981	443,620
<u>-</u>	2019	2018
Revenue	737,677	480,786
Profit for the year	165,698	103,384
Other comprehensive income for the year	(1,036)	(455)
Total comprehensive income for the year	164,662	102,929
Dividends received from the joint venture during the year	48,425	25,432

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28 Investments in joint ventures (continued)

Reconciliation of the above summarised financial information to the carrying amount of the interest in the joint venture recognised in the consolidated financial statements:

	December 31, 2019	December 31, 2018
Net assets of the joint venture	250,935	184,645
Proportion of the Group's ownership interest in the joint venture	124,021	90,476
Purchase Price Allocation	160,813	160,813
Impairment	(38,322)	(38,322)
Amortization of Purchase Price Allocation	(75,797)	(73,158)
Carrying amount of the Group's interest in the joint venture	170,715	139,809
Aggregate information of joint ventures that are not individually ma	nterial:	
Bantaş Nakit ve Kıymetli Mal Taşıma ve Güvenlik Hizmetleri A.Ş	2019	2018
The Group's share of profit for the year	10,092	5,577
The Group's share of total comprehensive income	10,092	5,577
Aggregate carrying amount of the Group's interest in the joint venture	28,669	18,571

The Group has no share of any contingent liabilities or capital commitments as at December 31, 2019 and 2018.

In accordance with partnership agreement signed between the Bank and Cigna Nederland Gamma BV, the parent of Cigna Finans Emeklilik and Hayat A.Ş., on July 12, 2012 in case the ownership structure of the Bank changes, Cigna Nederland Gamma BV has the right to purchase the shares owned by the Bank. If subject transfer is actualized share transfer will be based on fair value of the shares. As of the report date, there is no official request received from Cigna Nederland Gamma BV in regards to purchase of the shares.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

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29 Intangible assets

Cost	Purchased software	Internally generated software	Total
December 31, 2018	380,802	847,320	1,228,122
Additions	10,156	175,698	185,854
Disposals and write offs	(9)	-	(9)
December 31, 2019	390,949	1,023,018	1,413,967
Accumulated amortization and impairment			
December 31, 2018	(233,992)	(560,241)	(794,233)
Amortization charge for the year	(29,229)	(109,796)	(139,025)
Disposals and write offs	7	-	7
Impairment charge for the period	<u> </u>	(1,281)	(1,281)
December 31, 2019	(263,214)	(671,318)	(934,532)
Net book value as of December 31, 2019	127,735	351,700	479,435

There was no indication of impairment for the intangible assets.

Cost	Purchased software	Internally generated software	Total
December 31, 2017	309,349	709,412	1,018,761
Additions	71,450	137,908	209,358
Disposals and write offs	3	-	3
December 31, 2018	380,802	847,320	1,228,122
Accumulated amortization and impairment			
December 31, 2017	(209,795)	(464,251)	(674,046)
Amortization charge for the year	(24,244)	(95,990)	(120,234)
Disposals and write offs	47	-	47
December 31, 2018	(233,992)	(560,241)	(794,233)
Net book value as of December 31, 2018	146,810	287,079	433,889

30 Property and equipment

Cost	Land & Buildings	Vehicles	Other	Right of use assets(*)	Total
December 31, 2018	2,443,055	4,224	1,862,595	487,709	4,797,583
Additions	27,433	559	228,813	195,978	452,783
Fair value adjustment(***)	(27,979)	-	-	-	(27,979)
Acquisition of subsidiaries	-	-	-	-	-
Disposals and write offs	(15,453)	(274)	(16,417)	(8,645)	(40,789)
At December 31, 2019	2,427,056	4,509	2,074,991	675,042	5,181,598
Accumulated depreciation and impairment					
December 31, 2018	(71,310)	(1,976)	(1,343,137)	-	(1,416,423)
Depreciation charge for the year	(21,528)	(774)	(137,944)	(219,526)	(379,772)
Disposals and write offs	69	193	15,908	6,779	22,949
Impairment charge	-	-	-	-	-
December 31, 2019	(92,769)	(2,557)	(1,465,173)	(212,747)	(1,773,246)
Net book value as of December 31, 2019	2,334,287	1,952	609,818	462,295	3,408,352

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

30 Property and equipment (continued)

Cost	Land & Buildings	Vehicles & Equipment	Leasehold Improvements	Total
December 31, 2017	1,566,373	1,237,773	447,495	3,251,641
Additions	24,498	176,451	20,954	221,903
Fair value adjustment(***)	852,714	-	-	852,714
Disposals and write offs	(530)	(15,854)	-	(16,384)
At December 31, 2018	2,443,055	1,398,370	468,449	4,309,874
Accumulated depreciation and impairment				
December 31, 2017	(59,887)	(882,621)	(349,210)	(1,291,718)
Depreciation charge for the year	(11,825)	(124,921)	(2,958)	(139,704)
Disposals and write offs		14,597		14,597
Impairment charge	402	-	-	402
December 31, 2018	(71,310)	(992,945)	(352,168)	(1,416,423)
Net book value as of December 31, 2018	2,371,745	405,425	116,281	2,893,451

^(*) Includes IFRS 16 effects adopted in year 2019.

^(**) The fair value currency difference income amounting to TL 27,685 (the amortized) that belongs to the real estate, which is subjected to fair value hedge accounting by the Parent Bank, is shown in the "Impairment" line of the Financial Fixed Assets movement table.

^(***) As of September 30, 2018, the Bank terminated the hedge accounting for the fair value hedge of the fair value risk arising from the changes in the exchange rates for the real estates purchased in previous periods in foreign currency and the fair value of which is in foreign currency in the market. Fair value exchange difference adjustment amounting to TL 1,253,266 which is shown in property and equipment in the balance sheet, will be amortized over the economic life of the property subject to hedging.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

31 Deferred tax assets and liabilities

	December 31, 2019 Deferred tax	
	Assets	Liabilities
Loans and advances to customers	523,011	-
Deferred commission income	57,916	-
Plastic card bonus provisions	3,223	-
Employee termination benefits	52,544	-
Vacation pay liability and bonus accrual	73,485	-
Securities and derivatives	-	(217,367)
Economic life of property and equipment	-	(61,046)
Hedge accounting	5,983	-
Other temporary differences	10,298	-
Total deferred tax assets/(liabilities)	726,460	(278,413)

The Group has offset the deferred tax assets and deferred tax liabilities on an entity by entity basis where there is a legally enforceable right to set off the recognized amounts i.e. where a taxpayer may offset current tax assets against current tax liabilities and when the deferred income taxes relate to the same fiscal authority.

The movements in the net deferred tax asset / (liability) are presented as follows:

	2019
Deferred tax asset / (liability) at January 1	613,768
Loans and advances to customers	(176,997)
Deferred commission income	23,913
Plastic card bonus provisions	519
Employee termination benefits	6,433
Vacation pay liability and bonus accrual	3,598
Securities and derivatives	(384,607)
Economic life of property and equipment	(5,125)
Hedge accounting	282,967
Other temporary differences	(136,818)
Deferred tax recognized in statement of profit or loss (Note 17)	(386,117)
IFRS 9 Day 1 effect	-
Deferred tax recognized in other comprehensive income	220,396
Deferred tax asset at December 31	448,047

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

31 Deferred tax assets and liabilities (continued)

Since the applicable tax rate has been changed to 22% for the 3 years beginning from January 1, 2018, 22% tax rate is used in the deferred tax calculation of December 31, 2017 for the temporary differences expected to be realized/closed within 3 years (for the years 2018, 2019 and 2020).

Deferred tax recognized in other comprehensive income are as follows:

	December 31, 2019
Arising on income and expenses recognized in other comprehensive income:	
Fair value measurement of financial assets at FVOCI (Note 41)	(54,887)
Fair value measurement of cash flow hedges (Note 41)	271,759
Actuarial gains / (losses) related to employee benefits	6,539
Arising on income and expenses reclassified from equity to profit or loss:	
Relating to financial assets at FVOCI (Note 41)	(3,015)
Relating to cash flow hedges	
Total deferred income tax recognized in other comprehensive income	220,396

32 Other assets

	December 31, 2019	December 31, 2018
Prepaid expenses	740,804	645,767
Checks clearance account	506,612	714,694
Assets acquired through foreclosure proceedings	1,359,332	883,172
Trade receivables	358,438	321,878
VAT and other recoverable taxes	4,603	544
Other	5,168	134,772
Total other assets	2,974,957	2,700,827

33 Due to other banks

	December 31, 2019	December 31, 2018
Time deposits due to credit institutions	5,212,098	3,122,040
Securities sold under agreements to repurchase	2,708,678	10,835,881
Interbank deposits	10,207,081	618,853
Demand deposits due to credit institutions	194,282	555,541
Total due to other banks	18,322,139	15,132,315

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

34 Customer deposits

	December 31, 2019	December 31, 2018
Deposits:	·	
Individuals	86,565,933	71,123,773
Corporate	13,094,383	11,690,075
Government and agencies	415,993	319,471
Total deposits	100,076,309	83,133,319
Securities sold to customers under agreements to repurchase	25,290	19,876
Total customer deposits	100,101,599	83,153,195

35 Debt securities issued

	December 31, 2019	December 31, 2018
Corporate bonds - fixed rate	13,903,525	11,346,484
Corporate bonds - floating rate	442,587	445,048
Total debt securities issued	14,346,112	11,791,532

	December	31, 2019	December	31, 2018
	TL	FC	TL	FC
Debt securities issued	5,065,232	9,280,880	4,028,158	7,763,374
	5,065,232	9,280,880	4,028,158	7,763,374

	December 31, 2019	December 31, 2018
Opening balance	11,791,532	10,360,066
Proceeds during the year	26,950,136	16,587,608
Repayments during the year	(24,988,823)	(16,792,107)
Other non-cash movements	593,267	1,635,965
Total debt securities issued	14,346,112	11,791,532

36 Funds borrowed

	December 31, 2019	December 31, 2018
Subordinated loans - floating rate	5,432,553	4,816,098
Other	19,366,554	20,556,269
Total funds borrowed	24,799,107	25,372,367

The Bank has USD 910 million subdordinated loans from parent QNB. In 2019, the conversion of US\$525 million in tier 2 subordinated loans (of which US\$200 million was in Basel III-compliant format and the balance was in Basel III-compliant format) held by QNB into additional Tier 1 debt (with a fixed rate that resets every five years) and the conversion of a US\$125 million subordinated loan held by QNB into Basel III-compliant tier 2 debt.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

37 Other provisions

The movements in other provisions are summarized as follows:

2019	Provision for guarantees	Other	Total
Balance at January 1 Charge for the year	140,969 19,055	179,529 20,346	320,498 39,401
Utilized	(4,502)	(24,758)	(29,260)
Balance at December 31	Provision for	175,117	330,639
2018	guarantees	Other	Total
Balance at January 1	46,366	97,118	143,484
IFRS 9 Opening effect Charge for the year	176,520 9,099	- 82,548	176,520 91,647
Utilized	(91,016)	(137)	(91,153)
Balance at December 31	140,969	179,529	320,498

Other provisions include provisions for legal cases against the Group and tax provisions as of December 31, 2019.

38 Other liabilities

	December 31, 2019	December 31, 2018
Payables for credit card settlements	2,999,330	2,547,260
Cheques payable	614,499	956,103
Payroll related accruals	543,525	270,619
Cheque clearing accounts	532,593	743,589
Creditors and suppliers	428,531	365,059
Accrued expenses and deferred income	415,973	336,493
Taxes payable - other than income taxes	260,157	240,066
Credit cards payable	150,967	70,426
Blocked accounts	119,497	40,096
Legal fees payable	79,390	72,235
Collaterals received	61,514	48,357
Other	626,005	260,620
Total other liabilities	6,831,981	5,950,923

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

39 Contingent liabilities and commitments

a. Pending tax inspections

The tax authorities have not yet audited the Group for certain financial years and accordingly their tax obligations for those years may not be considered final. Additional taxes and penalties may be imposed as a result of such tax audits. Although the amount cannot be determined at present, it is not expected to have a material effect on the Group's net assets.

b. Credit commitments

In the normal course of business, the Group enters into various contractual commitments on behalf of its customers and is a party to financial instruments with off-balance sheet risk ("non-cash loans") to meet the financing needs of its customers. These contractual commitments consist of commitments to extend credit, commercial letters of credit and standby letters of credit and guarantees. Commitments to extend credit are agreements to lend to a customer as long as there is no violation of the conditions established in the contract. Commercial letters of credit ensure payment by a bank to a third party for a customer's foreign or domestic trade transactions, generally to finance a commercial contract for the shipment of goods. Standby letters of credit and financial guarantees are conditional commitments issued by the Group to guarantee the performance of a customer to a third party. All of these arrangements are related to the normal lending activities of the Group. The Group's exposure to credit loss in the events of non-performance by the other party to the financial instrument for commitments to extend credit and commercial and standby letters of credit is represented by the contractual notional amount of those instruments.

The Group uses the same credit policies in making commitments and conditional obligations as it does for on-balance-sheet instruments.

	December 31, 2019	December 31, 2018
Letters of guarantee	20,013,405	17,485,186
Acceptance credits	5,822,343	4,476,254
Letters of credit	2,667,496	1,727,806
Total non-cash loans	28,503,244	23,689,246
Other commitments	54,623,054	43,151,679
Credit card limits	28,852,687	22,392,258
Total non-cash loans and commitments	111,978,985	89,233,183

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

39 Contingent liabilities and commitments (continued)

The table below shows the credit quality and the maximum exposure to credit risk based on the Group's internal credit rating system and year-end stage classification.

Internal Rating Grade	Stage 1	Stage 2	Stage 3	Total
High grade	-	-	-	-
Standard grade	1,150,776	1,055	-	1,151,831
Sub-standard grade	109,751,155	697,361	-	110,448,516
Past due but not impared	-	-	-	-
Non-performing	-	-	378,639	378,639
Individually impaired	-	-	-	-
Total	110,901,931	698,416	378,639	111,978,986

	December 31, 2018				
Internal Rating Grade	Stage 1	Stage 2	Stage 3	Total	
High grade	-	-	-	-	
Standard grade	1,076,028	-	-	1,076,028	
Sub-standard grade	87,285,003	504,016	-	87,789,019	
Past due but not impared	-	-	-	-	
Non-performing	-	-	368,136	368,136	
Individually impaired	-	-	-	-	
Total	88,361,031	504,016	368,136	89,233,183	

The table below shows the changes in the gross carrying amount and the corresponding ECL allowances.

	December 31, 2019			
	Stage 1	Stage 2	Stage 3	Total
Gross carrying amount as January 1, 2019	88,361,031	504,016	368,136	89,233,183
New assets originated or purchased	24,744,614	3,511	-	24,748,125
Assets derecognised or repaid (excluding write offs)	(2,374,625)	132,114	(273,230)	(2,515,741)
Transfers to Stage 1	47,715	(47,715)	-	-
Transfers to Stage 2	(381,486)	381,486	-	-
Transfers to Stage 3	-	(279,071)	279,071	-
Changes to contractual cash flows due to				
modifications not resulting in derecognition	-	-	-	-
Amounts written off	-	-	-	-
Foreign exchange adjustments	504,682	4,075	4,662	513,419
Total	110,901,931	698,416	378,639	111,978,986

	December 31, 2018			
	Stage 1	Stage 2	Stage 3	Total
Gross carrying amount as January 1, 2018	70,201,912	613,031	92,036	70,906,979
New assets originated or purchased	19,559,257	3,550	-	19,562,807
Assets derecognised or repaid (excluding write offs)	(2,149,495)	(90,863)	(17,999)	(2,258,357)
Transfers to Stage 1	33,812	(33,812)	-	-
Transfers to Stage 2	(291,750)	291,750	-	-
Transfers to Stage 3	-	(288,195)	288,195	-
Changes to contractual cash flows due to				
modifications not resulting in derecognition	-	-	-	-
Amounts written off	-	-	-	-
Foreign exchange adjustments	1,007,295	8,555	5,904	1,021,754
Total	88,361,031	504,016	368,136	89,233,183

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

39 Contingent liabilities and commitments (continued)

	December 31, 2019			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at January 1, 2019	74,422	16,430	50,116	140,968
Transfers to Stage 1	(247)	247	-	-
Transfers to Stage 2	(15,148)	15,148	-	-
Transfers to Stage 3	-	(30,906)	30,906	-
Impairment allowance for the period, net	32,832	16,474	(35,918)	13,388
Amounts written off	-	-	-	-
Foreign exchange adjustments	578	78	510	1,166
Total	92,437	17,471	45,614	155,522

	December 31, 2018			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at January 1, 2018	198,746	13,171	10,969	222,886
Transfers to Stage 1	(280)	280	-	-
Transfers to Stage 2	(13,435)	13,435	-	-
Transfers to Stage 3	-	(37,389)	37,389	-
Impairment allowance for the period, net	(111,616)	26,527	1,196	(83,893)
Amounts written off	-	-	-	-
Foreign exchange adjustments	1,008	406	562	1,976
Total	74,423	16,430	50,116	140,969

c. Assets pledged as collaterals

	December 31, 2019	December 31, 2018
Reserve deposits with T.R. Central Bank	17,100,555	12,791,442
Securities given as collateral	1,328,369	1,713,283
Blocked placements at foreign banks	4,905	8,006
Total	18,433,829	14,512,731

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

39 Contingent liabilities and commitments (continued)

d. Offsetting financial assets and financial liabilities

	Gross carrying amounts (before offsetting)	Gross amounts offset in accordance with the offsetting criteria	Net amount presented in statement of financial position	right	remaining ts of set-off Fair value	Net exposure
					of financial	
Financial assets recognised				instruments	conateral	
at December 31, 2019						
Derivatives	7,939,310	-	7,939,310	3,792,110	3,792,110	4,147,199
Repurchase agreements and	2.120.056		2.120.056	2 120 056	2.120.056	
similar arrangements	3,128,856	-	3,128,856	3,128,856	3,128,856	-
Other	11,068,166		11,068,166	6,920,966	6,920,966	4,147,199
Total	11,000,100		11,000,100	0,720,700	0,720,700	4,147,177
Financial liabilities recognise December 31, 2019 Derivatives Repurchase agreements and similar arrangements	5,135,493 9,064,854	-	5,135,493 9,064,854	3,123,657 11,992,093	3,123,657 11,992,093	2,011,836 (2,927,239)
Other	14,200,347		14,200,347	15 115 750	15,115,750	(915,403)
Total	14,200,347		14,200,347	15,115,750	15,115,750	(915,405)
Financial assets recognised a December 31, 2018 Derivatives	t 12,401,328	_	12,401,328	6,140,938	6,140,938	6,260,390
Repurchase agreements and similar arrangements Other	100,070	<u> </u>	100,070	100,070	100,070	- -
Total	12,501,398		12,501,398	6,241,008	6,241,008	6,260,390
Financial liabilities recognise December 31, 2018 Derivatives	ed at 6,450,189	-	6,450,189	2,147,672	2,147,672	4,302,517
Repurchase agreements and similar arrangements	4,714,819	-	4,714,819	6,488,226	6,488,226	(1,773,407)
Other	11 165 000		11 165 000	9 625 000	Q 625 000	2 520 110
Total	11,165,008		11,165,008	8,635,898	8,635,898	2,529,110

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

39 Contingent liabilities and commitments (continued)

e. Operating lease commitments

	December 31, 2019	December 31, 2018
Not later than 1 year	187,854	186,866
Later than 1 year but not later than 5 years	476,364	494,881
Later than 5 years	167,229	187,104
Total operating lease commitments	831,447	868,851

f. Transferred financial assets

As at December 31, 2019, the carrying amount of transferred financial assets, which have been transferred but are subject to continued recognition in full and the associated recognized liabilities are presented in the table below:

	December 31, 2019	
	Carrying amount of transferred assets	Carrying amount of associated liabilities
Securities sold under agreements to repurchase	11,992,093	9,064,854
Total	11,992,093	9,064,854
	December 3	31, 2018
	Carrying amount of transferred assets	31, 2018 Carrying amount of associated liabilities
Securities sold under agreements to repurchase	Carrying amount of	Carrying amount of

As at December 31, 2019 carrying amount of financial assets at FVOCI, FVPL and those measured at amortized cost sold under agreements to repurchase are TL 5,475,062 (December 31, 2018: TL 2,814,590), none (December 31, 2018: None) and TL 6,517,031 (December 31, 2018: TL 3,673,636) respectively.

g. Assets under Management

The Group manages four exchange traded funds (December 31, 2018: seven) with total fund value of TL 292,051 (December 31, 2018: TL 157,449), seven mutual funds (December 31, 2018: seven) with total fund value of TL 3,203,155 (December 31, 2018: TL 247,229), one hedge fund with total fund value of TL 113,645 (December 31, 2018: TL 9,261), four private hedge fund with total value of TL 147,901 and 22 pension funds (December 31, 2018: five) with total fund value of TL 1,008,296 (December 31, 2018: TL 494,808). In accordance with the funds' charters, the Group purchases and sells marketable securities on behalf of funds, markets their participation certificates and provides other services in return for a management fee and undertakes management responsibility for their operations.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

40 Share capital issued

Share capital	Number of shares	Amount TL
January 1, 2018	33,500,000,000	3,350,000
Increase of share capital	-	-
December 31, 2018	33,500,000,000	3,350,000
Increase of share capital	<u> </u>	
December 31, 2019	33,500,000,000	3,350,000

41 Reserves and retained earnings

2019	Legal Reserves	Other Capital Reserves and Retained Earnings	Total
Balance at January 1, 2018	640,211	10,743,038	11,383,249
Issue of share capital	-	-	-
Transfer from retained earnings Changes in consolidation structure due to acquisition of the shares from non-controlling interest in subsidiaries	88,279	(88,279)	-
Dividends paid	<u>-</u>	<u>-</u>	_
Profit for the year	-	2,862,992	2,862,992
Balance at December 31	728,490	13,517,751	14,246,241
2018	Legal Reserves	Other Capital Reserves and Retained Earnings	Total
Balance at January 1	555,862	9,806,623	10,362,485
Impact of adopting IFRS 9 at January 1, 2018	-	(1,431,156)	(1,431,156)
Restated balances at January 1, 2018	555,862	8,375,467	8,931,329
Issue of share capital	-	-	-
Transfer from retained earnings Changes in consolidation structure due to acquisition of the shares from non-controlling interest in subsidiaries	84,349	(84,349)	-
Dividends paid	_	(100,000)	(100,000)
Profit for the year		` ' '	, , ,
	-	2,551,920	2,551,920

Legal reserves are not available for distribution unless they exceed 50% of the share capital, but may be used to absorb losses in the event that the general reserve is exhausted.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

41 Reserves and retained earnings (continued)

The legal reserves consist of first and second legal reserves in accordance with the Turkish Commercial Code. The first legal reserve is appropriated out of the statutory profit at the rate of 5%, until the total reserve reaches a maximum of 20% of the Bank's share capital. The second legal reserve is appropriated at the rate of 10% of all distributions in excess of 5% of the entity's share capital.

Movements of unrealized gains/losses on FVOCI investments, net of tax

	2019	2018
Balance at January 1	(452,050)	(229,575)
IFRS 9 opening effect	-	88,513
Net change in fair value	349,660	(390,940)
Net amount transferred to profit or loss	(9,099)	(9,099)
Tax effect of net gains/losses on FVOCI (Note 31)	(57,902)	89,051
Total	(169,391)	(452,050)
Movements of Cash Flow Hedges, Net of Tax	2019	2018
Balance at January 1	397,059	231,847
Net change in fair value	(1,093,633)	209,001
Net amount transferred to profit or loss	(140,154)	668
Tax effect of net gains/losses on cash flow hedges	271,759	(44,457)
Total	(564,969)	397,059

42 Dividends

The dividends declared and paid by the Group, on its shares with respect to the profits for the prior periods indicated are as follows:

	2019	2018
Dividends paid in cash	-	100,000

Amount was distributed in the subsequent period.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

43 Cash and cash equivalents

For the purposes of the cash flow statement, cash and cash equivalents consist of the following balances:

	December 31, 2019	December 31, 2018
Cash and balances with T.R. Central Bank	10,594,183	7,654,666
Balances with T.R Central Bank	8,949,618	5,949,644
Cash on hand Due from banks with original maturities of less than three	1,644,565	1,705,022
months	4,219,302	1,563,449
Total cash and cash equivalents	14,813,485	9,218,115

44 Related - party balances and transactions

The nature of the related party relationships for those related parties with whom the Group entered into significant transactions or had significant balances outstanding at December 31, 2019 and 2018 are presented below.

a. Balances and transactions with members of the Board of Directors and the key management of the Group

The Group entered into banking transactions with members of the Board of Directors and key management of the Bank and other Group companies, as well as with the close members of family and entities controlled or jointly controlled by those persons, in the normal course of business. The list of the members of the Board of Directors of the Bank is shown under Note 1 General Information.

	December 31, 2019	December 31, 2018
Assets		
Loans and advances to customers	362	259
Liabilities		
Customer deposits	173,579	88,981
	12 month period ended December 31	
	2019	2018
Statement of profit or loss		
Interest income	75	57
Fee and commission income	8	6
Interest expense	7,223	5,821

Compensation of the members of the Board of Directors and the key management of the Group

The members of the Board of Directors and management received remuneration and benefits totaling approximately TL 133,128 as of December 31, 2019, (December 31, 2018 – TL 102,819) comprising mainly of salaries and other short-term benefits.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

Related - party balances and transactions (continued)

b. Balances and transactions with shareholders

	December 31, 2019	December 31, 2018
Assets		
Due from banks	-	-
Derivative financial assets ^(*)	-	-
Liabilities		
Due to other banks	36,131	33,648
Derivative financial liabilities ^(*)	-	-
Funds borrowed- Subordinated loans	5,432,826	4,816,339
Funds borrowed-Other	485,717	347,835
Off-Balance		
Non-cash loans	37,126	16,572
	12 month period en	ded December 31
	2019	2018
Statement of profit or loss		
Interest income	-	-
Fee and commission income	-	15
Interest expense	16,179	269,785
Fee and commission expense	-	-
Net trading income and results from investment securities	-	-

^(*) The amounts refer to fair values of the derivative transactions presented at the consolidated statement of financial position as of the balance sheet date.

The Group has not pledged any guarantees for the above transactions.

c. Other related party (other companies of QNB Group) balances and transactions

The Group has given loan to a QNB Group company amounting to TL 1,139,032 as of December 31, 2019, (December 31, 2018 – none).

d. Balances and transactions with subsidiaries

Balances and transactions between the Bank and its subsidiaries, which are related parties of the Bank have been eliminated on consolidation and are not disclosed in this note.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

45 Group consolidated companies

	% Participation		
	Place of		
Name	Incorporation	December 31, 2019	December 31, 2018
QNB Finans Faktoring Hizmetleri A.Ş. (Finans Factoring)	Turkey	100.00%	100.00%
QNB Finans Yatırım Menkul Degerler A.Ş. (Finans Invest)	Turkey	100.00%	100.00%
QNB Finans Varlık Kiralama Şirketi A.Ş.	Turkey	100.00%	100.00%
QNB Finans Portfoy Yonetimi A.Ş. (Finans Portfolio Asset			
Management)	Turkey	100.00%	100.00%
QNB Finans Finansal Kiralama A.Ş. (Finans Leasing)	Turkey	99.40%	99.40%
PSA Finansman A.Ş. (Consumer Financing)	Turkey	100.00%	100.00%
Ibtech Uluslararası Bilişim ve İletişim Teknolojileri			
Araştırma, Geliştirme, Danışmanlık, Destek San. ve Tic.			
A.Ş. (IBTech)	Turkey	99.99%	99.99%
E-Finans Elektronik Ticaret ve Bilişim Hizmetleri A.Ş.	Turkey	100.00%	100.00%
Bosphorus Financial Services(*)	Cayman Islands	100.00%	100.00%
Istanbul Bond Company(*)	Luxembourg	100.00%	100.00%

^(*) Structured Entity.

46 Disposal of Subsidiaries

None.

47 Acquisition of Subsidiaries

None.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

48 Subsequent events

On March 11, 2020, the World Health Organization declared Pandemic the outbreak of a coronavirus (COVID-19). As the situation is still evolving, and its extent is highly uncertain at the time of issuing these financial statements, the management of QNB Finansbank considers providing a quantitative and correct estimate of the potential impact of this outbreak on the Bank impracticable.

Since the Pandemic affected Turkey, QNB Finansbank has introduced all the measures required, imposed by external authorities and internal measures directed to continuous monitoring and mitigating potential negative impacts of the Pandemic. The impact will be recognized by the Bank in 2020.

Management will continue to monitor the potential impact and will take all measures available and steps possible to mitigate negative impacts. Management considers the COVID-19 outbreak to be a non-adjusting subsequent event.

There are no other subsequent events that would require either adjustments or other additional disclosures in the financial statements.

a. The Board of Directors has resolved to submit the profit distribution proposal as set out below to the approval of the General Assembly Meeting held on 26 March 2020. The Bank will not distribute dividend.

To distribute the net profit of full amount TL 2,622,156,605.88, which was calculated on the basis of the Bank's 2019 financial statements by deducting the taxes payable, as follows:

General Statutory Reserve

General Reserve

Total

TL

TL 2,622,156,605.88

TL 2,622,156,605.88

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2019

Amounts expressed in thousands of Turkish Lira (TL) unless otherwise stated

48 Subsequent events (continued)

b. The table below shows the bond issuances:

Value Date	Currency	Nominal Value	Interest Rate	Maturity
02.01.2020	TRY	77,145	10.71%	89
03.01.2020	TRY	99,035	Floating	371
10.01.2020	TRY	71,340	Floating	182
13.01.2020	TRY	32,089	10.42%	65
14.01.2020	TRY	27,194	10.49%	64
15.01.2020	TRY	98,400	10.49%	64
16.01.2020	TRY	50,075	10.45%	62
17.01.2020	TRY	213,380	10.45%	84
18.01.2020	TRY	62,200	10.11%	54
22.01.2020	TRY	83,301	10.27%	62
23.01.2020	TRY	20,700	10.04%	69
24.01.2020	TRY	316,000	10.07%	84
29.01.2020	TRY	71,710	10.23%	69
31.01.2020	TRY	71,710	10.20%	68
				98
31.01.2020	TRY	97,000	9.94%	
03.02.2020	TRY	81,698	10.29%	87
04.02.2020	TRY	163,552	10.27%	70
05.02.2020	TRY	52,200	10.06%	92
06.02.2020	TRY	57,751	10.30%	91
12.02.2020	TRY	97,000	10.63%	69
14.02.2020	TRY	50,330	10.49%	91
18.02.2020	TRY	160,741	10.47%	178
18.02.2020	TRY	65,857	10.61%	57
20.02.2020	TRY	38,142	10.58%	69
21.02.2020	TRY	104,000	Floating	182
25.02.2020	GBP	5,000	0.80%	91
26.02.2020	TRY	78,590	10.82%	50
28.02.2020	GBP	10,000	0.80%	90
28.02.2020	TRY	122,089	10.59%	91
06.03.2020	TRY	38,320	10.67%	77
06.03.2020	TRY	525,140	Floating	182
06.03.2020	TRY	23,027	10.61%	83
18.03.2020	GBP	10,000	1.40%	184
19.03.2020	TRY	91,862	10.96%	69
20.03.2020	TRY	473,000	Floating	182
20.03.2020	TRY	61,200	10.64%	62
25.03.2020	TRY	150,251	11.65%	50
27.03.2020	TRY	42,000	9.73%	182
27.03.2020	TRY	33,586	11.10%	56
31.03.2020	TRY	41,250	11.28%	70
				70 91
01.04.2020	GBP	10,000	0.83%	
01.04.2020	TRY	78,037	11.32%	90
02.04.2020	TRY	29,100	11.30%	62
03.04.2020	TRY	216,500	11.05%	77
07.04.2020	GBP	10,000	1.10%	91
08.04.2020	TRY	73,089	11.50%	70
09.04.2020	TRY	67,490	11.28%	70
10.04.2020	TRY	351,300	11.04%	84
16.04.2020	GBP	12,000	1.40%	91
16.04.2020	TRY	217,854	10.87%	69
17.04.2020	TRY	293,850	10.82%	84
21.04.2020	GBP	10,000	1.40%	91
22.04.2020	TRY	185,300	10.64%	64
22.04.2020	TRY	111,093	10.68%	70
29.04.2020	TRY	81,361	9.33%	69