

Izvještaj o poslovanju 2011.

Opšte informacije

ERSTE BANK AD PODGORICA

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Obraćanje Predsjednika Odbora direktora

Ekonomsko okruženje u kojem smo poslovali u 2011. bilo je veoma slično prethodnoj godini. Stope ekonomskog rasta i dalje su skromne, pod uticajem novog talasa krize koji se pojavio u drugoj polovini godine. Likvidnost realnog sektora je i dalje problem. Uprkos nepovoljnom okruženju, Erste banka je i u prošloj godini napravila krupne korake naprijed, čvrsto na liniji svojih strategijskih smjernica.

Poslovanje Erste banke rezultiralo je rastom u svim ključnim kategorijama. Ostvarili smo dvocifrene stope rasta ukupne aktive, kreditiranja i depozita klijenata. Sa velikim zadovoljstvom i ponosom mogu saopštiti da smo nadmašili postavljene planove i zauzeli poziciju među strateškim bankama na tržištu.

Tokom 2011. godine Erste banka je uspjela da ostvari značajan rast tržišnog učešća u svim sferama. Posebnu pažnju posvetili smo kvalitetu plasmana, a izlaganje granama industrije koje su značajnije pogođene krizom ostala je minimalna. Banka je u 2011. godini rasla znatno brže od lokalnog bankarskog tržišta i uspjela povećati svoj tržišni udio po svim relevantnim parametrima.

Tržišni udio u ukupnoj aktivi porastao je za 2,5 procentna poena na 10,7% krajem 2011. U istom je periodu tržišni udio u ukupnim kreditima porastao za 3,4 procentna poena na 12,2%, vođen prvenstveno značajnim rastom u segmentu kreditiranja pravnih lica, ali i u segmentu stanovništva. Veliku pažnju posvetili smo privlačenju novih klijenata, a naročito tržišnih lidera, što je dalo značajne rezultate.

Banka je ojačala i poziciju na tržištu u pogledu ukupnih depozita, gdje je tržišno učešće ojačalo za 1,7 procentni poen na 9,0% krajem 2011. godine.

Naš uspjeh zapažen je i u međunarodnoj bankarskoj zajednici. Ugledni finansijski magazin The Banker, u izdanju Financial Times Group, dodijelio je Erste banci prestižno priznanje "Banka godine u Crnoj Gori". Priznanje shvatamo kao potvrdu da smo na pravom putu i prepoznavanje našeg opredjeljenja da pružimo podršku klijentima i lokalnoj ekonomiji onda kada je najpotrebnije. Istovremeno, svjesni smo da nas uspjeh koji smo ostvarili obavezuje da sve naše kapacitete usmjerimo na to da i dalje nastavimo u istom pravcu. Praksu da uspjeh dijelimo sa zajednicom u kojoj poslujemo produbili smo u toku prošle godine. Generalnom sponzorstvu Crnogorskog simfonijskog orkestra, dodali smo i generalno sponzorstvo prve crnogorske košarkaške lige – Erste lige.

Erste banka će i u 2012. godini raditi na prilagođavanju ponude potrebama i mogućnostima klijenata, kako u segmentu stanovništva tako i segmentu pravnih lica. U ovoj godini banka će biti posvećena unapređenju kvaliteta usluge, ostvarivanju rasta u relevantnim pokazateljima i povećanju operativne efikasnosti.

U ime Odbora direktora čestitam menadžerskom timu i svim zaposlenima na još jednoj izvanrednoj godini.

Reinhard Ortner Predsjednik Odbora direktora



Obraćanje Glavnog izvršnog direktora

Erste banka je i u 2011. godini nastavila dobar trend. Rasli smo znatno brže od lokalnog bankarskog tržišta i ostvarili rast tržišnog učešća u svim kategorijama, zadržavši visok kvalitet finansijskog rezultata. Zahvaljujući posebnoj pažnji usmjerenoj na povećanje kreditne aktivnosti, upravljanje rizicima i operativnu efikasnost, ostvarili smo dobit prije oporezivanja u iznosu od 4,13 miliona EUR, što je 63,75% više u odnosu na prethodnu godinu. Neto dobit iznosi 3,67 miliona EUR, sa povratom na kapital od 13,6% i povratom na aktivu od 1,4%. Ukupan prihod iz poslovanja ostvaren je u iznosu 22,4 miliona EUR što je 11% više u odnosu na 2010. godinu.

Ukupna aktiva Banke je na kraju 2010. godine iznosila 299,38 miliona EUR i porasla je za 25,34% u odnosu na uporedni period prethodne godine. U prošloj godini smo potvrdili opredjeljenje da klijentima, građanima i pravnim licima pružimo kvalitetnu savjetodavnu i finansijsku podršku. Neto krediti klijentima su na kraju 2011. godine iznosili 242,68 miliona EUR i bili su veći 31,17% u odnosu na godinu ranije.

U segmentu stanovništva ostvaren je rast kreditnog portfelja od 15,37%, prvenstveno zahvaljujući inoviranju ponude i njihovom prilagođavanju tržišnim okolnostima. Realizovano je 60,08 miliona EUR novih plasmana, što je 11% više u odnosu na godinu ranije. Najveći dio odnosio se na gotovinske kredite, stambene, mikro/agro i kredite za njihovo refinansiranje, kao i na hipotekarne i kredite za adaptaciju stambenog prostora.

Kreditni portfelj malom i srednjem biznisu je u prošloj godini zabilježio rast od čak 53,04% u odnosu na 2010. Osim podrške malim i srednjim preduzećima i većim kompanijama u Crnoj Gori, Erste banka je povećala i obim saradnje sa javnim sektorom.

Nastavljen je kontinuirani rast depozita, koji su na kraju 2011. godine iznosili 174,81 milion EUR, što je 24,56% više u odnosu na uporedni prošlogodišnji period.

Rizični profil Erste banke u 2011. godini bio je znatno bolji od nivoa bankarskog tržišta kao cjeline. Troškovi rezervisanja i kreditnog rizika su niži u odnosu na 2010. godinu, dok su svi pokazatelji likvidnosti bili značajno iznad zakonskih minimuma. Koeficijent solventnosti je na kraju 2011. godine iznosio 13,66%, što je značajno iznad zakonskog minimuma od 10%. Nastavili smo da unapređujemo efikasnost poslovnih procesa i u prošloj godini, pa je odnos troškova i prihoda smanjen za 0,8 procentnih poena na 51,8%.

Erste banka je u 2011. jačala svoj tim i otvorila više novih radnih mjesta. Ukupno je u na kraju 2011. godine bilo 265 zaposlenih, za 16 više u odnosu na godinu ranije. Banka je u prošloj godini širila mrežu bankomata i nastavila sa rekonstrukcijom filijala ka standardima Erste Grupe.

Ponosni smo na ostvarene rezultate u 2011. godini, u kojoj smo pokazali posvećenost našim klijentima i namjeru da podržimo kvalitetne projekte u cilju oporavka ekonomije. I u narednom periodu ćemo biti fokusirani na jačanje naše pozicije i učvršćivanje dugoročnih partnerskih veza sa klijentima.

Iskoristio bih priliku da se zahvalim svom timu, svim zaposlenima, poslovnim partnerima i klijentima na izuzetnoj saradnji.

Glavni izvršni direktor Aleksa Lukić

Izvršni direktori





ALEKSA LUKIĆ, glavni izvršni direktor

nadležan za Sektor stanovništva, Službu ljudskih resursa, Službu interne revizije, Službu komunikacija i Službu upravljanja distributivnim kanalima

ALMA MEKIĆ ĆERDIĆ, izvršni direktor

nadležna za Sektor privrede, Službu riznice i Službu marketinga





DARKO KEKOVIĆ, izvršni direktor

nadležan za Sektor informacione tehnologije i organizacije, Sektor procesinga, Sektor upravljanja imovinom i Službu pravnih poslova

PREDRAG LALOVIĆ, izvršni direktor

 nadležan za Sektor finansija i računovodstva, Sektor upravljanja rizicima i Službu sprečavanja pranja novca

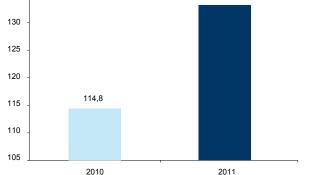
Stanovništvo

Poslovanje Sektora stanovništva u 2011. godini nastavljeno je na liniji trenda iz prethodnih godina i bilježilo je rast, kako u kreditnom, tako i u depozitnom portfelju. Tržišno učešće je raslo a prodajni planovi su ostvareni konstantnim prilagođavanjem i obogaćivanjem ponude proizvoda.

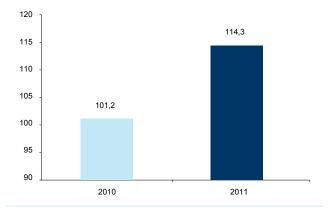
Nastavljajući sa inoviranjem ponude u cilju kvalitetnije podrške klijentima, u prošloj godini su uvedeni turistički krediti, namijenjeni fizičkim licima sa registrovanim smještajnim kapacitetima. Inovirali smo ponudu gotovinskih kredita u pogledu uslova i obezbjeđenja, a proširili dostupnost stambenim kreditima i na vlasnike privatnih preduzeća. Unaprijedili smo usluge obavještavanja za vlasnike tekućih računa i učinili dostupnijom uslugu dozvoljenog minusa po računu.



Graf 1. Krediti Sektora stanovništva u milionima eura



Graf 2. Depoziti Sektora stanovništva u milionima eura



Plasmani u 2011. godini su bili oko 11 % veći u odnosu na prethodnu godinu, što je dovelo do rasta kreditnog portfelja sektora stanovništva za 15,37%. Depoziti porasli za 12,94%.

Tržišno učešće u kreditima (izračunato prema lokalnim standardima finansijskog izvještavanja) poraslo je za +2,28 p.p. na 15,09%. Istovremeno, tržišno učešće u depozitima sektora stanovništva je poraslo za +0,29 p.p. na 10,90%.

Ojačana je tržišna pozicija prema broju klijenata koji svoja redovna mjesečna primanja usmjeravaju na račune kod Erste banke, i njih je bilo 86,12% više u odnosu na 2010. godinu.

Sinergijskim efektom nedavno formirane službe naplate i saradnika i intenziviranim radom na refinansiranju i reprogramu kredita, poboljšani su pokazatelji kvaliteta kreditnog portfelja.

Fokus na cross-selling aktivnosti zaposlenih na šalterima u posljednjem kvartalu 2011. godine vrlo vrzo je rezultirao dobrim prodajnim efektima u tom dijelu.

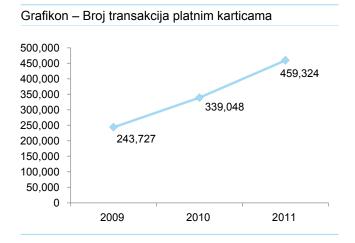
U želji da se obezbijedi kontinuitet razvoja zaposlenih, formiran je tim internih trenera u sektoru stanovništva.

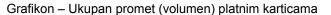
Upravljanje distributivnim kanalima prodaje

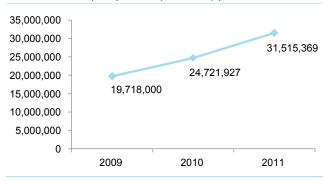
Na 31.12.2011. Erste banka je imala 25.246 aktivnih platnih kartica, što je u odnosu na kraj 2010. povećanje od 14,12%. Broj debitnih u ukupnom broju izdatih platnih kartica na kraj 2011. godine iznosi 17.934, dok je izdatih kreditnih kartica 7.312.



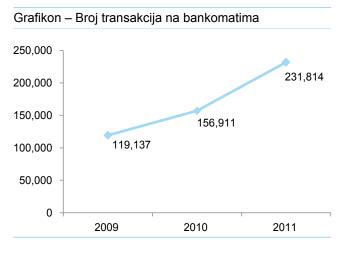
Broj transakcija platnim karticama raste za 35,47%, a ukupan promet (volumen) za 27,48% u odnosu na 2010. godinu.

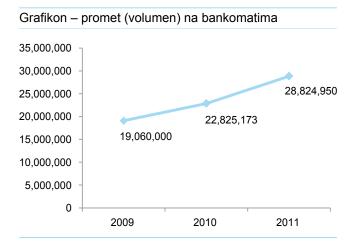






Broj transakcija na bankomatima je uvećan za 47,74%. Ukupan promet ili volumen na kraju 2011. iznosio 28.824.950 EUR u odnosu na kraj 2010. kada je bio 22.825.173, što predstavlja povećanje od 26,29%.





Erste banka je u prošloj godini reizdala sve platne kartice uvodeći chip kao novi sigurnosni element, s obzirom na to da klijenti sve više poklanjaju pažnju sigurnostiobavljanja transakcija. U cilju optimizacije troškova, razvijena je aplikacija koja priprema, konvertuje i šalje fakture za kreditne kartice na e-mail adrese korisnika, umjesto na poštanske adrese.

Broj korisnika elektronskog bankarstva je porastao za 49,78%. Rast u segmentu SME i corporate klijenata iznosio je 63,55%, a fizičkih lica 43,52%.

U prošloj godini je unaprijeđen servis SMS notifikacije za promjenu stanja po računima. Uvedena je mogućnost slanja notifikacije i klijentima koji koriste kartice mobilnih operatera koji posluju van Crne Gore, u čemu je Erste banka prva i jedinstvena na tržištu.

Privreda

U skladu sa strateškim odrednicama, nastavljen je dalji rast tržišnog učešća i produbljivanje saradnje sa privrednim subjektima. Uprkos nepovoljnom poslovnom ambijentu, ostvaren je znatan rast kako kreditnog tako i depozitnog portfelja.

Tokom 2011. godine nastavljen je pad ukupnog kredita pravnih lica na bankarskom tržištu generalno za 16,14%, dok je pad depozita iznosio 6,67%. U navedenom periodu, sektor privrede Erste banke je ostvario rast tržišnog učešća u dijelu kredita sa 6,12% na 10,01% (3,89 p.p) i u dijelu depozita sa 3,51 % na 6,39 % (2,88 p.p).

Naročita pažnja je posvećena širenju baze klijenata i stimulisanju obavljanja njihovih poslovnih relacija unutar sistema banke. Nakon privlačenja tržišnih lidera fokus pažnje je stavljen na njihove kooperante i SME segment u cjelini. U prilog ostvarenih rezultata govori i rast od 58,79 % u odnosu na prethodnu godinu po osnovu prihoda od platnog prometa.

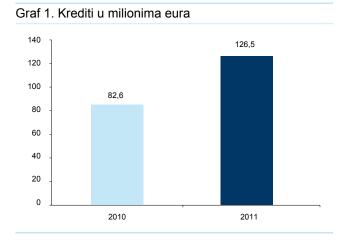
Ponuda Banke je dopunjena novim proizvodima poput kreditnog i garancijskog limita i inicirane su aktivnosti za dalje proširenje ponude koje će uslijediti tokom 2012. godine. Preduzete su značajne aktivnosti na poboljšanju procedura i ubrzanju procesa rada kako bi se dalje unaprijedila fleksibilnost i efikasnost po kojoj smo prepoznati na tržištu.

Nastavljena je saradnja sa Investiciono razvojnim fondom i Evropskom bankom za obnovu i razvoj što je omogućilo našim klijentima pristup stimulativnim kamatnim stopama za kreditne aranžmane.

Aktivnim pristupom prema klijentima, iskazanom fleksibilnošću kao i dobrom cjenovnom politikom ostvarili smo uspješne rezultate u 2011. godini i povećali bazu klijenata.

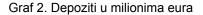
Krediti privredi

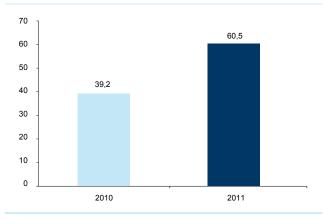
Sektor privrede je tokom 2011. godine ostvario rast kreditnog portfelja od 53,04 %. Nastavljena je saradnja sa javnim sektorom, prvenstveno crnogorskim opštinama. U dijelu SME/Corporate kredita ostvaren je rast od 24,73%.



Depoziti privrede

Tokom 2011. godine zabilježen je rast depozita od 54,58 % kao posljedica uvećanja saradnje sa pravnim licima i povjerenja u banku u cjelini.





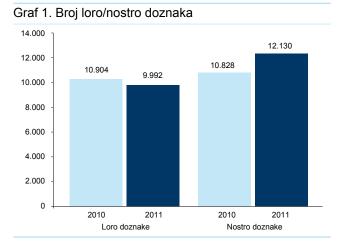
Najveći rast je u dijelu oročenih depozita dok je u dijelu depozita po viđenju došlo do blagog pada u decembru mjesecu usled redovnih transfera klijenata i potreba finansiranja.

Platni promet

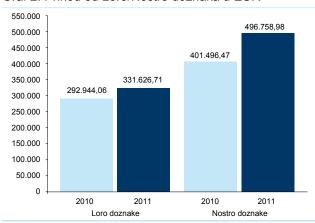
Platni promet bilježi trend rasta po obimu transakcija i po ukupno ostvarenom prihodu u 2011. godini, karakterišu procesi koji su se odnosili na spovođenje regulative, implementaciju novih softverskih modula, traženje novih rješenja za unapređenje kvaliteta usluga.

Platni promet sa inostranstvom

Uporedo sa razvojem korespondentnih i drugih odnosa sa stranim bankama, Erste banka obavlja i poslove plaćanja i naplata iz inostranstva, prijem inostranih čekova, poslove trade finance-a i dr. U 2011. godini realizovano je 9.992 loro doznaka u ukupnom iznosu 167 miliona EUR i 12.130 nostro doznaka, ukupnog iznosa oko 158 milionaEUR.



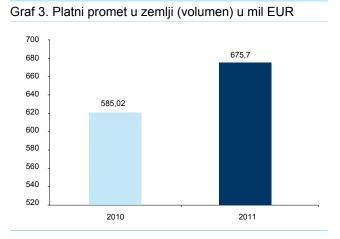
Ukupan prihod po ovim poslovima iznosio je 828.385,69 eura čime je ostvaren rast od 19,29% u odnosu na ostvarene prihode iz 2010. godine.



Tokom 2011. Erste bank AD Podgorica je izdala 283 bankarske garancije i ostvarila rast od 59% u odnosu na 2010. godinu. Po ovim poslovima ukupan prihod iznosio je 70.125,37eura. Naplaćeno je 544 inostrana čeka, čijom je realizacijom ostvaren prihod u iznosu od 6.800 eura.

Platni promet u zemlji

Preko široke mreža filijala i poslovnih jedinica realizovano je 526.635 transakcija u platnom prometu u zemlji, a obim plaćanja je porastao za 15,5% i iznosio je oko 675,7 miliona eura.



Graf 2. Prihod od Loro/Nostro doznaka u EUR

FX trading

Obzirom da je od stranih valuta na deviznim bilansnim pozicijama najviše zastupljen USD, posebna pažnja je posvećena odnosu EUR/USD.

Tokom prvih pet mjeseci 2011. godine kurs američkog dolara prema euru bio je pretežno izložen depresijacijskim pritiscima. Ipak, u drugoj polovini godine intenzivirali su se apresijacijski pritisci na američki dolar pod uticajem nepovoljne fiskalne situacije pojedinih članica eurozone. Aktivno prateći pomenute trendove, upravljanje deviznim bilansnim pozicijama, posebno onih u USD, bilo je maksimalno racionalno, što je dovelo do rezultata koji je za 11% nadmašio budžetirani prihod po ovom osnovu. Upoređujući prihod od FX trgovanja iz 2010, u 2011. je ostvareni prihod bio veći za 107%.

Rizici

Godina 2011. je bila promjenljiva i neizvjesna. Umjeren oporavak globalne ekonomije u prvoj polovini 2011. godine je pozitivno uticao na većinu ekonomskih indikatora u Crnoj Gori. Početak druge polovine godine je nagovijestilo novi talas krize na globalnom nivou koji je i postao izvjestan do kraja godine. U posljednjim mjesecima došlo je do povećanja fiskalnih i finansijskih rizika u razvijenim zemljama koji će imati negativan uticaj na privredni rast u 2012. godini. Novi talas krize u drugoj polovini 2011. u Crnoj Gori, nije imao negativan uticaj na sve segmente realnog sektora. Rast turizma iznad svih očekivanja (10,2% u prvih 9 mjeseci 2011. godine), pozitivno je uticao na povezane industrije u oblasti usluga i proizvodnje hrane i pića. 2011. godinu u najvećoj mjeri karakteriše konsolidacija javnih finansija, stagnacija javnih prihoda, te rast državnog duga, deficita i inflacije.

Rizik nelikvidnosti bankarskog sistema je znatno umanjen, ali je bankarska aktivnost bila ograničena. Izloženost kreditnom riziku je rasla usljed nelikvidnosti realnog sektora koja je i dalje izražena. Rizični profil Erste banke u 2011. godini bio je znatno bolji od profila bankarskog tržišta kao cjeline. To se ogleda u znatno boljim pokazateljima kvaliteta aktive i nižeg kreditnog rizika od industrijskog prosjeka. Izraženo su niži procenti dana kašnjenja i NPL-a u odnosu na sistemske vrijednosti. Kašnjenje kredita se tokom 2011. godine stabilizovalo i ostalo je znatno niže od prosjeka u zemlji. Troškovi rezervisanja niži su za 11,3% u odnosu na 2010. godinu i bili su 5,5% niži od projektovanih za kraj godine. Trošak kreditnog rizika iznosi 2,27% i značajno je niži u odnosu na kraj 2010. godine kad je iznosio 3,36%. Pokrivenost NPL-a rezervama visoka je i iznosila je 71,3% na kraju 2011. Likvidnost Banke je konstantno bila jaka - svi pokazatelji likvidnosti znatno iznad zakonskih minimuma. Izloženost tržišnom riziku je i tokom 2011. godine ostala na niskom nivou. Banka je 2011. godinu završila kao dobro kapitalizovana banka sa koeficijentom solventnosti od 15,26% (sa uključenom dobiti tekuće godine).

Tokom 2011. godine Banka je uspjela da ostvari zavidan rast tržišnog učešća u svim sferama, pritom izuzetno vodeći računa o kvalitetu plasmana orijentacijom na klijente i industrijske grane koji su minimalno ili nijesu pogođeni krizom i čija perspektiva poslovanja je neupitna. Izlaganje banke prema granama industrije koje su značajnije pogođene krizom, npr. građevinarstvu, ostala je minimalna i te grane nijesu bile u fokusu interesovanja.

Ljudski resursi

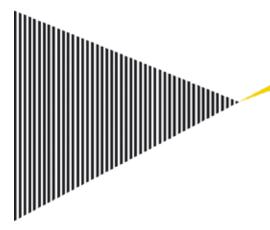
S obzirom na to da tržište stalno raste i mijenja se, to je i razvoj ljudskih potencijala veliki izazov za Službu ljudskih resursa. Potrebe za ljudskim resursima Banka zadovoljava razvojem svojih zaposlenih i zapošljavanjem novih ljudi

Na kraju 2011. godine Banka je brojila 265 zaposlenih, što je povećanje za 6,42% u odnosu na prethodnu godinu. Od ukupnog broja zaposlenih zastupljenost žena je skoro 50%, a visoku stručnu spremu imalo je iznad 60% zaposlenih. Posebna pažnja posvećena je edukaciji kroz stručno usavršavanje zaposlenih, kao i razvoju njihovih "mekih" vještina.

U toku godine Erste banka je učestvovala na sajmu zapošljavanja Career ways, kao i u programu Erste grupe za talente, što će biti nastavljeno i u 2012. godini.

Širenje mreže

Erste banka je u prošloj godini nastavila sa rekonstrukcijom mreže poslovnica i njihovom potpunom prilagođavanju standardima Grupe. Rekonstruisane su i proširene filijale Ulcinj i Berane. Mreža bankomata je takođe proširena, za 10%.



IFRS FINANCIAL STATEMENTS 31 DECEMBER 2011



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INDEPENDENT AUDITOR'S REPORT

TO THE OWNERS ERSTE BANK A.D., PODGORICA

We have audited the accompanying financial statements of Erste Bank A.D., Podgorica (hereinafter: the Bank), which comprise the balance sheet as at 31 December 2011, and the statement of comprehensive income, statement of changes in equity and cash flow statement for the year then ended, and a summary of significant accounting policies and other explanatory notes.

Management's Responsibility for the Financial Statements

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

Auditors' Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with International Standards on Auditing. Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements 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 entity's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

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

Opinion

In our opinion, the financial statements give a true and fair view of the financial position of the Bank as at 31 December 2011, and of its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards.

Podgorica, 7 March 2012

Ernst & Young Montenegro d.o.o.

PIE: 02759080 • Matični broj: 02759080 • Uplsan i unet osnovni kapital: 5.000,00 EUR Registarški trncj: 5-0537354/001 kod Centralnog registra Privrednog suda u Podoprici Pistovni cazluri: 232501/02759080 kod Cinogorski Komercialine Banke AD Podoprici

STATEMENT OF COMPREHENSIVE INCOME FOR THE YEAR ENDED 31 DECEMBER 2011

In thousands of EUR	Notes	2011	2010
Interest income	5	28,449	25,922
Interest expense	5	(8,438)	(7,305)
Net interest income		20,011	18,617
Fee and commission income	6	2,600	1,828
Fee and commission expense	6	(484)	(389)
Net fee and commission income		2,116	1,439
Trading income	7	278	134
Credit loss expense	8	(5,831)	(6,576)
General administrative expenses	9	(11,602)	(10,616)
Other operating result	10	(827)	(474)
Profit before tax		4,145	2,524
Income tax	11	(461)	(287)
Profit for the year		3,684	2,237
Other comprehensive income			
(Losses)/gains on financial instruments			
available for sale		(1,566)	155
Actuarial gains on long-term employee benefits		7	62
Income tax relating to items of other comprehensive income		140	(19)
Total other comprehensive income for the year, net of tax		(1,419)	198
Total comprehensive income for the year, net of tax		2,265	2,435

The accompanying notes are an integral part of these financial statements

Podgorica, 7 March 2012

Approved by and signed on behalf of Erste Bank A.D., Podgorica

Predrag Lalovic Aleksa Lukić **Chief Executive Director**

Kristina Bukilić

Director of Finance and Accounting

STATEMENT OF FINANCIAL POSITION FOR THE YEAR ENDED 31 DECEMBER 2011

In thousands of EUR	Note	2011	2010
ASSETS			
Cash and balances with banks and Central Bank	12	23,327	18,508
Loans and advances to banks, net	13	3,626	13,343
Loans and advances to customers, net	14	242,683	186,682
Financial assets available for sale	15	16,268	10,482
Financial assets held to maturity	16	6,346	2,376
Property and equipment	17	5,650	5,641
intangible assets	18	413	427
Current tax assets			227
Other assets, net	19	1,082	1,165
Total assets		299,395	238,851
LIABILITIES AND EQUITY			
Liabilities			
Deposits from banks		54	0410 1212 ZV
Deposits from customers	20	164,572	131,893
Other borrowed funds	21	89,152	79,822
Debt securities	22	15,015	-
Current tax liability		161	
Deferred tax liabilities	11	98	163
Other liabilities	23	2,673	1,568
Total liabilities		271,725	213,446
Shareholders' equity	24		
Share capital		5,339	5,339
Share premium		1,571	1,571
General risk reserves		182	182
Other capital reserves		300	300
Revaluation reserves		677	698
Fair value reserves		(1,188)	237
Retained earnings		20,789	17,078
Total shareholders' equity		27,670	25,405
Total liabilities and shareholders' equity		299,395	238,851

The accompanying notes are an integral part of these financial statements.

Podgorica, 7 March 2012

Approved by and signed on behalf of Erste Bank A.D., Podgorica

Dolla Predrag Lalović Aleksa Lukić Chief Executive Director Executive Director

Kristina Bukilić Director of Finance and Accounting

STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2011

In thousands of EUR	2011	2010
Operating activities		
Net income	3,684	2,237
Adjustments to reconcile net income to cash flows	1900000	112,226,0
from operating activities:		
Depreciation and amortization	960	910
Net losses on fixed assets	8	12
Foreign currency translation gains	(278)	(134)
Interest on securities	(1, 174)	(515)
Provision for loan losses	5,831	6,576
Income tax expense	461	287
Change in operating assets and liabilities:		
Increase in mandatory reserves		
with the Central Bank of Montenegro	(4,171)	
Increase in loans to customers	(61,541)	(53,182)
Increase decrease/(increase) in other assets	83	(699)
Increase in securities available for sale	(6,178)	(4,354)
Increase in securities held to maturity	(3,970)	(1)
Increase in deposits from banks and customers	32,680	19,517
Increase in other liabilities	1,803	833
Paid bonuses for staff	(738)	(38)
Net cash used in operating activities	(32,542)	(28,551)
Investing activities		
Acquisitions of fixed and intangible assets	(874)	(1,236)
Net cash used in investing activities	(874)	(1,236)
Financing activities		
Proceeds from borrowings	24,345	35,050
Net cash from/(used in) financing activities	24,345	35,050
Net (decrease)/increase in cash and cash equivalents	(9,069)	5,263
Cash and cash equivalents at beginning of year	24,675	19,412
Cash and cash equivalents at end of year (Notes 12 and 13)	15,606	24,675
Interest paid	7,770	7,050
Interest received	26,600	24,343

The accompanying notes are an integral part of these financial statements.

Podgorica, 7 March 2012

Approved by and signed on behalf of Erste Bank A.D., Podgorica

STER Aleksa Lukić Predrag Lalovic

Chief Executive Director

Kristina Bukilić Director of Finance and Accounting

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STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31 DECEMBER 2011

In thousands of EUR	Share capital	Share premium	Other reserves	General risk reserves	Revaluation	Fair value reserves	Retained earnings	Total
Balance as at 1 January 2010 Total comprehensive income Depreciation of revalued fixed assets	5,339	1,571	300	182	719 (21)	96 141	14,763 2,294 21	22,970 2,435
Balance as at 31 December 2010	5,339	1,571	300	182	698	237	17,078	25,405
Balance as at 1 January 2011 Total comprehensive income Depreciation of revalued fixed assets	5,339	1,571	300	182	698 (21)	237 (1,425)	17,078 3,690 21	25,405 2,265
Balance as at 31 December 2011	5,339	1,571	300	182	677	(1,188)	20,789	27,670

The accompanying notes are an integral part of these financial statements.

Podgorica, 7 March 2012

Approved by and signed on behalf of Erste Bank A.D., Podgorica

Director of Finance and Accounting Kristina Bukilić ve Directó Lalov Chief Executive Director Aleksa Lukić

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1. ACTIVITY

Erste Bank A.D., Podgorica ("the Bank") was registered in April 2002, based on the Decision of the

Monetary Council of the Central Bank of Montenegro as Opportunity Bank A.D., Podgorica. The Bank

changed its name in July 2010 to Erste Bank A.D., Podgorica. The Bank has received a license to

perform payments and deposit activities domestically and abroad. The Bank is a joint stock company incorporated and domiciled in Montenegro. Its registered office is

at Marka Miljanova 46, Podgorica, Montenegro.

In accordance with the Law on Banks, Articles of Association, Statute and Decision of the Central

Bank of Montenegro, the Bank performs the following operations:

- accepting deposits and other funds of private individuals and legal entities and the use of these
- funds, either partially or wholly, for granting loans or investing on the Bank's own behalf;
- issuing guarantees and accepting other obligations;
- purchase and collection of claims;
- issuing, processing and recording payment instruments (including credit cards, travel and bank checks);
- foreign payment operations;
- financial leasing;
- trading on its own behalf and for its own account or for the account of clients with foreign
- currencies, including exchange operations,
- currency and interest rate instruments;
- collecting, analyzing and giving information and advice on credit worthiness of companies and entrepreneurs and other issues regarding operations;
- deposit operations;
- safe-keeping services;
- activities directly related to the operations of the Bank and other activities, which are of an ancillary nature in relation to the Bank operations.

The Bank conducts its operations through its Head Office and fifteen branches located in the cities

of Podgorica, Berane, Nikšić, Bijelo Polje, Pljevlja, Bar, Kotor, Ulcinj, Budva, Herceg Novi, Rožaje,

Cetinje and Tivat.

Erste & Steiermarkische Bank d.d., Rijeka, Croatia owns 100% shares of the Bank from 27 February

2010. The ultimate parent of the Group is Erste Group Bank AG, Vienna, Austria.

As at 31 December 2011, the Bank had 265 employees (2010: 247).

2. BASIS OF PREPARATION

Statements of compliance

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

The Bank is required to maintain its records and prepare its financial statements for regulatory purposes in accordance with Montenegrin banking regulation and related instructions. These financial statements are based on the Bank's statutory books and records, as adjusted and reclassified in order to comply with IFRS.

Basis of measurement

The financial statements have been prepared on the historical cost basis except for the financial instruments at fair value through profit or loss, financial instruments available for sale and property which are measured at fair value.

Functional and presentation currency

The financial statements are presented in thousands of Euro (EUR) which is the Bank's functional and presentation currency.

Use of estimates and judgments

The preparation of financial statements in conformity with IFRSs requires management to make judgments, estimates and assumptions that affect the application of accounting policies and reported amounts of assets and liabilities, income and expenses. The estimates and associated assumptions are based on historical experience and various other factors that are believed to be reasonable under the circumstances, the results of which form the basis of making the judgments about carrying values of assets and liabilities that are not readily apparent from other sources. Actual results may differ from these estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised if the revision affects only that period or in the period of the revision and future periods if the revision affects both current and future periods. Information about significant areas of estimation uncertainty and critical estimates in applying accounting policies that have the most significant effect on the amount recognized in the financial statements are described in Note 4.

A summary of the principal accounting policies applied in preparing the IFRS financial statements are set out within Note 3 to the financial statements.

Consolidation

The Bank does not have control over any other entity.

Going concern

The Bank's management has made an assessment of the Bank's ability to continue as a going concern and is satisfied that the Bank 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 upon the Bank's ability to continue as a going concern. Therefore, the financial statements continue to be prepared on the going concern basis.

3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Changes in accounting policies

The accounting policies adopted are consistent with those of the previous year. Amendments resulting from Improvements to IFRSs to the following standards did not have any impact on the accounting policies, financial position or performance of the Bank:

- IFRIC 14 Prepayments of a Minimum Funding Requirement (Amended)
- IFRIC 19 Extinguishing Financial Liabilities with Equity Instruments
- IAS 24 Related Party Disclosures (Amended)
- IAS 32 Classification on Rights Issues (Amended)
- IFRS 1 Limited Exemption from Comparative IFRS 7 Disclosures for the first time adopters (Amended)

Improvements to IFRSs

Other amendments resulting from Improvements to IFRSs to the following standards and interpretations did not have any impact on the accounting policies, financial position or performance of the Group:

- IFRS 1 First-time adoption
- IFRS 3 Business Combinations
- IFRS 7 Financial Instruments Disclosures
- IAS 1 Presentation of Financial Statements
- IAS 27 Consolidated and Separate Financial Statements
- IAS 34 Interim Financial Reporting
- IFRIC 13 Customer Loyalty Programmes

Foreign currency translation

Transactions in foreign currency are translated at the foreign exchange rate ruling at the date of the transaction. Monetary assets and liabilities denominated in foreign currencies are translated at the foreign exchange rate ruling at the statement of financial position date. Foreign exchange differences arising on translation are recognized in the income statement.

Non-monetary assets denominated in foreign currency are translated at the rate ruling at the historic date.

Official exchange rates for major currencies used in the translation

of assets and liabilities denominated in foreign currencies at 31 December 2011 and 2010 are as follows:

In EUR	2011	2010
USD	0.7729	0.7530
CHF	0.8226	0.8016
GBP	1.1972	1.1625

Recognition of income and expenses

Interest

Interest income and expense are recognized in the income statement using the effective interest method. The effective interest rate is the rate that exactly discounts the estimated future cash payments and receipts through the expected life of the financial asset or liability (or, where appropriate, a shorter period) to the carrying amount of the financial asset or liability.

The calculation of the effective interest rate includes all fees and points paid or received transaction costs, and discounts or premiums that are an integral part of the effective interest

rate. Transaction costs are incremental costs that are directly attributable to the acquisition, issue or disposal of a financial asset or liability.

Fees and commissions

Fees and commissions income/expenses arising upon financial services provided by/to the Bank include transfer payments and other banking services.

Fees and commission income and expenses that are integral to the effective interest rate on a financial asset or liability are deferred and recognised as a part of the effective interest rate.

When a loan commitment is not expected to result in the drawdown of a loan, loan commitment fees are recognized in the income statement on an accrual basis.

Other fees and commission expense relate mainly to transaction and service fees, which are recognized in income statement as the services are provided or received.

Recognition of income and expenses (continued)

Net trading income

Foreign exchange rate gains includes foreign currency exchange gains (realized and unrealized) and losses, fair value adjustments and gains/losses on sale of financial assets at fair value through profit or loss and financial assets available for sale.

Operating lease expenses

The Bank is involved in operating lease arrangements as the lessee. Payments made under operating leases are recognized in profit or loss on a straight-line basis over the term of the lease. Lease incentives received are recognized as an integral part of the total lease expense, over the term of the lease.

Income and other taxes

Income tax expense comprises current and deferred tax. Income tax expense is recognized in the income statement except to the extent that it relates to items recognized directly in equity, in which case it is recognized in equity.

Current income tax

Current tax represents an amount calculated and payable under the Montenegrin Corporate Income Tax Law. The income tax rate is 9% (2010: 9%) and is payable on taxable profit.

Taxable profit includes the profit shown in the statutory income statement, as adjusted for differences, as defined by the Montenegrin Corporate Income Tax Law.

Montenegrin Tax Law does not allow tax losses of the current period to be used to recover tax paid within a specific carry back period. However, current year losses may be used to decrease taxable profits for future periods up to a maximum of five years.

Deferred tax

Deferred tax is provided using the balance sheet method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the financial statements. Currently, enacted tax rates are used in the determination of deferred income tax. Deferred tax is provided using the balance sheet method, providing for temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes. Deferred tax is not recognized for the following temporary differences: the initial recognition of goodwill, the initial recognition of assets or liabilities in a transaction that is not a business combination and that affects neither accounting nor taxable profit, and differences relating to investments in subsidiaries to the extent that they probably will not reverse in the foreseeable future. Deferred tax is measured at the tax rates that are expected to be applied to the temporary differences when they reverse, based on the laws that have been enacted or substantively enacted by the reporting date.

A deferred tax asset is recognized only to the extent that it is probable that future taxable profits will be available against which the asset can be utilized. Deferred tax assets are reviewed at each reporting date and are reduced to the extent that it is no longer probable that the related tax benefit will be realized.

Financial assets and liabilities

Classification

The Bank classifies its financial assets into the following categories: financial assets at fair value through profit or loss, held-to-maturity investments, available-for-sale financial assets and loans and advances. The Bank classifies its financial liabilities into the following categories: financial liabilities at fair value through profit or loss and other financial liabilities.

Financial assets or liabilities at fair value through profit or loss are financial instruments that are classified as held for trading or upon initial recognition are designated by the Bank as at fair value through profit or loss. Financial assets or liabilities at fair value through profit or loss are those that the Bank acquired or incurred principally for the purpose of selling or repurchasing it in the near term, part of a portfolio of identified financial instruments that are managed together and for which there is evidence of a recent actual pattern of short-term profit-taking or derivatives.

Held to maturity investments are non-derivative financial assets with fixed or determinable payments and fixed maturity that the Bank has the positive intention and the ability to hold them to maturity.

Loans and advances are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. They arise when the Bank provides money or services directly to a debtor with no intention of trading the receivable. Loans and receivables comprise loans and advances to banks and customers.

Available for sale financial assets are those non-derivative financial assets that are designated as available for sale or are not classified as loans and receivables, held-to-maturity investments or financial assets at fair value through profit or loss. Available-for-sale investments are those intended to be held for an indefinite period of time, which may be sold in response to needs for liquidity or changes in interest rates, exchange rates or equity prices.

Equity investments are intended to be held for an indefinite period of time and may be sold in response to needs for liquidity or changes in equity prices.

Financial assets and liabilities (continued)

Recognition

Financial assets or liabilities at fair value through profit or loss, held to maturity investments and financial assets available for sale are initially recognised on the trade date, i.e., the date that the Bank becomes a party to the contractual provisions of the instrument. This includes "regular way trades": 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 other financial assets and liabilities are recognised on the settlement date, i.e., the date that an asset is delivered to or by Bank.

Initial measurement

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

Derecognition

The Bank derecognizes a financial asset when the contractual rights to the cash flows from the asset expire, or it transfers the rights to receive the contractual cash flows on the financial asset in a transaction in which substantially all the risks and rewards of ownership of the financial asset are transferred. Any interest in transferred financial assets that is created or retained by the Bank is recognized as a separate asset or liability.

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

The Bank writes off certain loans when they are determined to be uncollectible (see Note 28).

Amortized cost measurement

The amortized cost of a financial asset or liability is the amount at which the financial asset or liability is measured at initial recognition, minus principal repayments, plus or minus the cumulative amortization using the effective interest method of any difference between the initial amount recognized and the maturity amount, minus any reduction for impairment.

Fair value measurement

The fair values stated for financial instruments are the amounts for which the asset could be exchanged, or a liability settled, between knowledgeable, willing parties in an arm's length transaction.

The fair values of certain financial instruments are approximately equivalent to their carrying amounts. These include cash as well as receivables and liabilities without a defined maturity or fixed interest rate. For other receivables and liabilities, future anticipated cash flows are discounted to their present value using current interest rates.

Subsequent measurement

Financial assets or financial liabilities held-for-trading

Financial assets or financial liabilities held-for-trading are recorded in the statement of financial position at fair value. Changes in fair value are recognized in 'Net trading income'. Interest and dividend income or expense is recorded in 'Net trading income' according to the terms of the contract, or when the right to the payment has been established.

Loans and advances

Loans and advances are subsequently measured at amortized cost using the effective interest rate method less allowances for impairment. Amortized cost is calculated by taking into account any issuance costs and any discount or premium on settlement. The losses arising from impairment are recognized in the income statement.

When the Bank is the lessor in a lease agreement that transfers substantially all of the risks and rewards incidental to ownership of an asset to the lessee, the arrangement is classified as a finance lease and a receivable equal to the net investment in the lease is recognized and presented within loans and advances.

If a lessor transfers substantially all the risks and rewards incident to the ownership of an asset to the lessee, lease contracts are classified as finance leases. The Bank, as a lessor, recognizes assets held under a finance lease in its balance sheet and presents them as finance lease receivables at an amount equal to the net investment in the lease. The sum of future minimum lease payments and initial origination fees equate to the gross investment in the lease (since finance lease contracts include a purchase clause at the end of the lease period there is no unguaranteed residual value).

The difference between the gross and net investment in the lease represents unearned finance income, which is recognized as interest income over the lease term at a constant periodic rate of return on the net investment in the lease.

Financial assets available for sale

Financial assets available-for-sale are subsequently measured at fair value. Unrealized gains and losses are recognized directly in equity in the fair value reserve. When the investment is disposed of, the cumulative gain or loss previously recognized in equity is recognized in the income statement. Where the Bank holds more than one investment in the same security they are deemed to be disposed of on a first-in first-out basis. Interest earned whilst holding available-for-sale financial investments is reported as interest income using the effective interest rate. Dividends earned whilst holding financial asset available for sale are recognized in the income statement when the right of the payment has been established. The losses arising from impairment of such investments are recognized in the income statement and removed from the fair value reserve.

Financial assets held to maturity

Financial assets held-to-maturity are non-derivative financial assets quoted in an active market with fixed or determinable payments and fixed maturities, which the Bank has the intention and ability to hold to maturity. After initial measurement, financial assets held-to-maturity are subsequently measured at amortized cost using the effective interest rate, less impairment. Amortized cost is calculated by taking into account any discount or premium on acquisition and fees that are an integral part of the effective interest rate. The amortization is included in interest income. The losses arising from impairment of such investments are recognized in the income statement.

Other financial liabilities

Other financial liabilities are subsequently measured at amortized cost using the effective interest rate method.

Identification and measurement of impairment

At each balance sheet date the Bank assesses whether there is objective evidence that financial assets not carried at fair value through profit or loss are impaired. Financial assets are impaired when objective evidence demonstrates that a loss event has occurred after the initial recognition of the asset, and that the loss event has an impact on the future cash flows on the asset that can be estimated reliably.

The Bank considers evidence of impairment at both a specific asset and collective level. All individually significant financial assets are assessed individually for impairment. All significant assets found not to be specifically impaired are then collectively assessed for any impairment that has been incurred but not yet identified. Assets that are not individually significant are then collectively assessed for impairment by grouping together financial assets (carried at amortized cost) with similar risk characteristics.

Objective evidence that financial assets (including equity securities) are impaired can include default or delinquency by a borrower, restructuring of a loan or advance by the Bank on terms that the Bank would not otherwise consider, indications that a borrower or issuer will enter bankruptcy, the disappearance of an active market for a security, or other observable data relating to a group of assets such as adverse changes in the payment status of borrowers or issuers in the group, or economic conditions that correlate with defaults in the group.

In assessing collective impairment the Bank uses statistical modeling of historical trends of the probability of default, timing of recoveries and the amount of loss incurred, adjusted for management's judgment as to whether current economic and credit conditions are such that the actual losses are likely to be greater or less than suggested by historical modeling. Default rates, loss rates and the expected timing of future recoveries are regularly benchmarked against actual outcomes to ensure that they remain appropriate. Impairment losses on assets carried at amortized cost are measured as the difference between the carrying amount of the financial assets and the present value of estimated cash flows discounted at the assets' original effective interest rate. Losses are recognized in income statement and reflected in an allowance account against loans and advances. When a subsequent event causes the amount of impairment loss to decrease, the impairment loss is reversed through income statement.

Impairment losses on financial assets available for sale are recognized by transferring the difference between the amortized acquisition cost and current fair value out of equity to income statement. When a subsequent event causes the amount of impairment loss on an available-for-sale debt security to decrease, the impairment loss is reversed through income statement. However, any subsequent recovery in the fair value of an impaired available-for-sale equity security is recognized directly in equity.

Renegotiated loans

Where possible, the Bank seeks to restructure loans rather than to take possession of collateral. This may involve extending the payment arrangements and the agreement of new loan conditions. Once the terms have been renegotiated, the loan is no longer considered past due. Management continuously reviews renegotiated loans to ensure that all criteria are met and that future payments are likely to occur. The loans continue to be subject to an individual or collective impairment assessment, calculated using the loan's original effective interest rate.

Cash and cash equivalents

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

Cash and cash equivalents are carried at amortized cost in the balance sheet.

Property, plant and equipment

Property, plant and equipment are stated in the balance sheet at historical cost except buildings that are stated at valuation. Valuation of buildings was made in December 2010 by authorized valuer and there was no material change in value. Cost includes expenditure that is directly attributable to the acquisition of the asset.

When parts of an item of property or equipment have different useful lives, they are accounted for as separate items (major components) of property and equipment. Depreciation is recognized in profit or loss on a straight-line basis over the estimated useful lives of each part of an item of property and equipment. Depreciation rates in use are as follows:

Description	%
Building	2.5
Computers and related equipment	14.29 - 25
Furniture and other equipment	10-33.33

An annual transfer from the asset revaluation reserve to retained earnings is made for the difference between depreciation based on the revalued carrying amount of buildings and depreciation based on the assets original cost.

Maintenance and repairs are charged to profit and loss account when incurred. Improvements are capitalized.

Intangible assets

Intangible assets are stated at cost decreased for accumulated amortization and impairment.

Intangible assets represent computer software, Swift license, Master Card license and other intangible assets. Amortization is recognized in profit or loss on a straight-line basis over the estimated useful lives. Amortization rates used range from 20% to 25%.

Acquired assets held for sale

The Bank acquired fixed asset through the enforcement of security over loans and advances.

Acquired fixed assets are measured at the lower of its carrying amount and fair value less cost to sell.

Employment benefits

Pursuant to the Collective Bargaining Agreement, the Bank is obliged to pay retirement benefits in an amount equal to six average monthly salaries in the Bank. The entitlement to these benefits is usually conditional on the employee remaining in service up to retirement age and/or the completion of a minimum service period. The expected costs of these benefits are accrued over the period of employment.

Provision for retirement benefits is calculated by independent actuary. The liability recognized in the balance sheet is the present value of the obligation, determined by discounting estimated future outflows using the projected unit credit method. Actuarial gains and losses are recognized in the period in which they arise in other comprehensive income.

Financial guarantees

In ordinary course of business, the Bank gives financial guarantees, consisting of guarantees, performance bonds and acceptances. Financial guarantees are initially recognized in the financial statements at fair value, being the premium received. Subsequent to initial recognition the Bank's liability under each guarantee is measured at the higher of the amortized premium and the best estimate of expenditure required to settle any financial obligation arising as a result of the guarantee.

Any increase in the liability relating to the financial guarantees is taken to the income statement.

The premium received is recognized in the income statement on a straight line basis over the life of the guarantee.

Reclassifications

Certain amounts in the previous year financial statements have been reclassified to conform to the current year presentation. In 2011, the Bank reclassified accrued interest on financial assets from other assets to loans and advances to customers and assets available for sale. For consistency reasons, the amounts of EUR 1,594 thousand and EUR 233 thousand were reclassified from other assets as of 31 December 2010 to loans and advances to customers and financial assets available for sale, respectively. In 2011, the Bank also reclassified accrued interest on financial liabilities to deposits from customers and other borrowed funds. For consistency reasons, the amounts of EUR 1,401 thousand and EUR 579 thousand were reclassified from other liabilities as of 31 December 2010 to deposits from customers and other borrowed funds, respectively.

Future changes in accounting policies

Standards issued but not yet effective up to the date of issuance of the Bank's financial statements are listed below. This listing is of standards and interpretations issued, which the Bank reasonably expects to be applicable at a future date. The Bank intends to adopt those standards when they become effective.

IAS 1 Financial Statement Presentation (Amended) – Presentation of Items of Other Comprehensive Income

The amendment is effective for annual periods beginning on or after 1 July 2012. The amendments to IAS 1 change the grouping of items presented in OCI. Items that could be reclassified (or 'recycled') to profit or loss at a future point in time would be presented separately from items that will never be reclassified. The amendment affects presentation only and has no impact on the Bank's financial position or performance.

IAS 12 Income Taxes (Amended) – Recovery of Underlying Assets

The amendment is effective for annual periods beginning on or after 1 January 2012. The amendment clarified the determination of deferred tax on investment property measured at fair value. The amendment introduces a rebuttable presumption that deferred tax on investment property measured using the fair value model in IAS 40 should be determined on the basis that its carrying amount will be recovered through sale. Furthermore, it introduces the requirement that deferred tax on non-depreciable assets that are measured using the revaluation model in IAS 16 always be measured on a sale basis of the asset. Management expects that the amendment will not have effects on the financial position or performance of the Bank.

IAS 19 Employee Benefits (Amended)

The amendment is effective for annual periods beginning on or after 1 January 2013. The IASB has issued numerous amendments to IAS 19. These range from fundamental changes such as removing the corridor mechanism and the concept of expected returns on plan assets to simple clarifications and re-wording. Early application is permitted. The Bank is in the process of assessing the impact of this amendment on the financial position or performance of the Bank.

IAS 27 Separate Financial Statements (Revised)

The Standard is effective for annual periods beginning on or after 1 January 2013. As a consequence of the new IFRS 10 and IFRS 12, what remains of IAS 27 is limited to accounting for subsidiaries, jointly controlled entities, and associates in separate financial statements.

Earlier application is permitted. Management expects that the amendment will not have effects on the financial position or performance of the Bank.

IAS 28 Investments in Associates and Joint Ventures (Revised)

The Standard is effective for annual periods beginning on or after 1 January 2013. As a consequence of the new IFRS 11 and IFRS 12, IAS 28 has been renamed IAS 28 Investments in Associates and Joint Ventures, and describes the application of the equity method to investments in joint ventures in addition to associates. Earlier application is permitted.

Management exepcts that the amendment will not have effects on the financial position or performance of the Bank.

IAS 32 Financial Instruments: Presentation (Amended) - Offsetting Financial Assets and Financial Liabilities

The amendment is effective for annual periods beginning on or after 1 January 2014. This amendment clarifies the meaning of "currently has a legally enforceable right to set-off" and also clarifies the application of the IAS 32 offsetting criteria to settlement systems (such as central clearing house systems) which apply gross settlement mechanisms that are not simultaneous. The amendments to IAS 32 are to be retrospectively applied. Earlier application is permitted. However, if an entity chooses to early adopt, it must disclose that fact and also make the disclosures required by the IFRS 7 Offsetting Financial Assets and Financial Liabilities amendments. Management expects that the amendment will not have effects on the financial position or performance of the Bank.

IFRS 7 Financial Instruments: Disclosures (Amended) -Enhanced Derecognition Disclosure Requirements

The amendment is effective for annual periods beginning on or after 1 July 2011. The amendment requires additional disclosure about financial assets that have been transferred but not derecognised to enable the user of the financial statements to understand the relationship with those assets that have not been derecognised and their associated liabilities. In addition, the amendment requires disclosures about continuing involvement in derecognised assets to enable the user to evaluate the nature of, and risks associated with, the entity's continuing involvement in those derecognised assets. The amendment has only disclosure effects.

IFRS 7 Financial Instruments: Disclosures (Amended) -Offsetting Financial Assets and Financial Liabilities

The amendment is effective for annual periods beginning on or after 1 January 2013. The amendment introduces common disclosure requirements. These disclosures would provide users with information that is useful in evaluating the effect or potential effect of netting arrangements on an entity's financial position. The amendments to IFRS 7 are to be retrospectively applied. The amendment has only disclosure effects.

IFRS 9 Financial Instruments - Classification and Measurement

The new standard is effective for annual periods beginning on or after 1 January 2015. IFRS 9 as issued reflects the first phase of the IASBs work on the replacement of IAS 39 and applies to classification and measurement of financial assets and financial liabilities as defined in IAS 39.

Phase 1 of IFRS 9 will have a significant impact on (i) the classification and measurement of financial assets and (ii) a change in reporting for those entities that have designated financial liabilities using the FVO. In subsequent phases, the IASB will address hedge accounting and impairment of financial assets. The completion of this project is expected over the first half of 2012. Early application is permitted. The Bank is in the process of assessing the impact of this amendment on the financial position or performance of the Bank.

IFRS 10 Consolidated Financial Statements

The new standard is effective for annual periods beginning on or after 1 January 2013. IFRS 10 replaces the portion of IAS 27 Consolidated and Separate Financial Statements that addresses the accounting for consolidated financial statements. It also includes the issues raised in SIC-12 Consolidation — Special Purpose Entities. IFRS 10 establishes a single control model that applies to all entities including special purpose entities. The changes introduced by IFRS 10 will require management to exercise significant judgment to determine which entities are controlled, and therefore, are required to be consolidated by a parent, compared with the requirements that were in IAS 27. Management expects that the amendment will not have effects on the financial position or performance of the Bank.

IFRS 11 Joint Arrangements

The new standard is effective for annual periods beginning on or after 1 January 2013. IFRS 11 replaces IAS 31 Interests in Joint Ventures and SIC-13 Jointly-controlled Entities — Nonmonetary Contributions by Venturers. IFRS 11 removes the option to account for jointly controlled entities (JCEs) using proportionate consolidation. Instead, JCEs that meet the definition of a joint venture must be accounted for using the equity method. Management expects that the amendment will not have effects on the financial position or performance of the Bank.

IFRS 12 Disclosures of Involvement with Other Entities

The new standard is effective for annual periods beginning on or after 1 January 2013. IFRS 12 includes all of the disclosures that were previously in IAS 27 related to consolidated financial statements, as well as all of the disclosures that were previously included in IAS 31 and IAS 28.

These disclosures relate to an entity's interests in subsidiaries, joint arrangements, associates and structured entities. A number of new disclosures are also required. Management expects that the amendment will not have effects on the financial position or performance of the Bank.

IFRS 13 Fair Value Measurement

The new standard is effective for annual periods beginning on or after 1 January 2013. IFRS 13 establishes a single source of guidance under IFRS for all fair value measurements. IFRS 13 does not change when an entity is required to use fair value, but rather provides guidance on how to measure fair value under IFRS when fair value is required or permitted. This standard should be applied prospectively and early adoption is permitted. The Bank is in the process of assessing the impact of this amandment on the financial position or performance of the Bank.

IFRIC Interpretation 20 Stripping Costs in the Production Phase of a Surface Mine

The interpretation is effective for annual periods beginning on or after 1 January 2013. This interpretation only applies to stripping costs incurred in surface mining activity during the production phase of the mine ('production stripping costs'). Costs incurred in undertaking stripping activities are considered to create two possible benefits a) the production of inventory in the current period and/or b) improved access to ore to be mined in a future period (striping activity asset). Where cost cannot be specifically allocated between the inventory produced during the period and the stripping activity asset, IFRIC 20 requires an entity to use an allocation basis that is based on a relevant production measure. Early application is permitted.

Management expects that the amendment will not have effects on the financial position or performance of the Bank.

4. USE OF ESTIMATES AND JUDGMENTS

Management makes estimates and assumptions that affect the reported amounts of assets and liabilities within the next financial year. Estimates and judgments are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under circumstances.

These disclosures supplement the commentary on financial risk management (see Note 28).

The most significant uses of judgment and estimates are as follows:

Impairment losses on loans

The Bank reviews its loan portfolios to assess impairment at least on a monthly basis. In determining whether an impairment loss should be recorded in the income statement, the Bank makes judgments as to whether there is any observable data indicating that there is a measurable decrease in the estimated future cash flows from a portfolio of loans before the decrease can be identified with an individual loan in that portfolio. This evidence may include observable data indicating that there has been an adverse change in the payment status of borrowers, local economic conditions that correlate with defaults on assets.

Management uses estimates based on historical loss experience for assets with credit risk characteristics and objective evidence of impairment similar to those in the portfolio when scheduling its future cash flows. The methodology and assumptions used for estimating both the amount and timing of future cash flows are reviewed regularly to reduce any differences between loss estimates and actual loss experience.

Fair value of financial instruments

The determination of fair value for financial assets and liabilities for which there is no observable market price requires the use of valuation techniques. For financial instruments that trade infrequently and have little price transparency, fair value is less objective, and requires varying degrees of judgment depending on liquidity, concentration, uncertainty of market factors, pricing assumptions and other risks affecting the specific instrument.

Long-term employee benefits

The cost of the long-term employee benefits is determined using actuarial valuation. The actuarial valuation involves making assumptions about discount rates, future salary increases and personnel turnover rate. Due to the long term nature of these plans, such estimates are subject to significant uncertainty.

Useful lives of intangible assets, property, plant and equipment

The Bank reviews useful lives of intangible assets, property, plant and equipment as of each annual reporting period.

5. NET INTEREST INCOME

In thousands of EUR	2011	2010
Interest income		
Time deposits with foreign banks	57	32
Loans and advances to customers	27,092	25,265
Financial assets available for sale	1,174	515
Financial assets held to maturity	100	86
Other	26	24
Total interest income	28,449	25,922
Interest expense		
Deposits from banks	(3,141)	(2,092)
Deposits from customers	(4,562)	(5,013)
Debt securities	(506)	-
Subordinated liabilities	(229)	(200)
Total interest expense	(8,438)	(7,305)
-		
Net interest income	20,011	18,617

6. NET FEE AND COMMISSION INCOME

In thousands of EUR	2011	2010
Fee and commission income		
Lending business	164	51
Payment transfers	1,268	1,173
Card transactions	473	369
Other fee and commission income	695	235
Total fee and commission income	2,600	1,828
Fee and commission expense		
Payment transfers	(187)	(172)
Card transactions	(241)	(189)
Custodial fees	(36)	(10)
Other fee and commission expenses	(20)	(18)
Total fee and commission expense	(484)	(389)
Net fee and commission income	2,116	1,439

7. TRADING INCOME

In thousands of EUR	2011	2010
Net foreign exchange gains	278	164
Losses on fair value of call option	-	(30)
Total	278	134

8. CREDIT LOSS EXPENSE

In thousands of EUR	2011	2010
Loans and advances to customers	5,545	6,648
Loans and advances to banks	(5)	2
Provision for contingent liabilities	291	(74)
Total	5,831	6,576

9. GENERAL ADMINISTRATIVE EXPENSES

In thousands of EUR	2011	2010
Personnel expenses	6,823	6,272
Other administrative expenses	3,819	3,434
Depreciation of property and equipment (Note 17)	784	710
Amortization of intangible assets (Note 18)	176	200
Total	11,602	10,616
Personnel expenses		
In thousands of EUR	2011	2010
Wages and salaries - net	4,034	3,741
Tax on salaries	545	502
Employee contributions	1,485	1,337
Legal social security contribution	720	663
Other personnel expenses	11	3
Provision for long-term employee benefits	28	26
Total	6,823	6,272

Employees of the Bank receive their pensions from the Montenegrin Pension and Disability Insurance Fund and medical benefits from the Montenegrin Health Insurance Fund, which are accounted as defined contribution plans.

Other administrative expenses

In thousands of EUR	2011	2010
Expenses dependent upon personnel	308	222
Expenses for office space	1,005	937
Office operating expenses	796	673
IT expenses	569	654
Advertising / marketing	531	476
Legal and consulting costs	594	449
Sundry administrative expenses	16	23
Total	3,819	3,434

10. OTHER OPERATING RESULT

In thousands of EUR	2011	2010
Other operating income	123	197
Payment into deposit insurance fund	(546)	(327)
Net losses from fixed assets	(8)	(12)
Provision for litigation	88	(187)
Provision for other assets	(129)	(6)
Write off of fee and commission receivables	(256)	-
Other provisions	(60)	(58)
Other expense	(39)	(81)
Total	(827)	(474)

11. INCOME TAX

The components of income tax for the years ended 31 December 2011 and 2010 are:

In thousands of EUR	2011	2010
Current tax – current income tax	386	263
Deferred tax – relating to origination and		
reversal of temporary differences	75	24
Total income tax expense in income statement	461	287

Reconciliation between the tax expense and the accounting result multiplied by the Montenegrin tax rate for the year ended 31 December 2011 and 2010 is as follows:

In thousands of EUR	2011	2010
Accounting profit before tax	4,145	2,524
At Montenegrin statutory tax rate of 9%	373	202
Non-deductable expenses	84	61
Other	4	24
Income tax reported in the income statement	461	287

Deferred tax related to items charged or credited directly to equity during the year is as follows:

In thousands of EUR	2011	2010
Losses on financial assets available for sale	(141)	5
Actuarial gains on long-term employee benefits	1	14
Total	(140)	19

Deferred tax assets and liabilities recognized in balance sheet relate to the following:

		2011		2010	2010	
In thousands of EUR	Assets	Liabilities	Net	Assets	Liabilities	Net
Depreciation of fixed assets	-	(35)	(35)		(41)	(41)
Actuarial gains on long-term						. ,
employee benefits						
recognized in equity		(8)	(8)	-	(7)	(7)
Gains on financial assets						
available for sale	118	-	118	-	(23)	(23)
Revaluation of property	-	(83)	(83)	-	(80)	(80)
Allowances for loan losses	-	(90)	(90)	-	(12)	(12)
Net tax assets/(liabilities)	118	(216)	(98)	_	(163)	(163)

12. CASH AND BALANCES WITH BANKS AND CENTRAL BANK

In thousands of EUR	2011	2010
Cash on hand	7,725	5,767
Current accounts with the Central Bank of Montenegro	4,255	5,565
Total included in cash and cash equivalents	11,980	11,332
Deposits with the Central Bank of Montenegro	11,347	7,176
Balance as at 31 December	23,327	18,508

Deposits with the Central Bank of Montenegro relate to mandatory reserve requirements and are calculated by applying rate of 9.5% on demand deposits and term deposits with original maturity up to one year (original maturity up to 365 days) and rate 8.5% on the part of the deposit with original maturity over one year (original maturity over 365 days). If deposits with original maturity over one year (original maturity up to 365 days) have option clause for early repayment within one year, then the rate of 9.5% is applied. The Bank can hold 25% of those reserves in treasury bills issued by the Government of Montenegro. Mandatory reserve deposits are available for use up to 50% in the Bank's day-to-day operations.

13. LOANS AND ADVANCES TO BANKS, NET

In thousands of EUR	2011	2010
Current accounts with foreign banks	3,386	13,114
Deposit for Master Card business	242	236
	3,628	13,350
Allowance for impairment	(2)	(7)
Balance as at 31 December	3,626	13,343

14. LOANS AND ADVANCES TO CUSTOMERS, NET

		2011			2010		
	Gross		Carrying	Gross		Carrying	
In thousands of EUR	Amount	Impairment	Amount	Amount	Impairment	Amount	
Retail customers	132,423	(10,931)	121,492	115,812	(9,087)	106,725	
Corporate customers	69,403	(4,994)	64,409	70,673	(3,242)	67,431	
Public customers	56,724	(263)	56,461	12,547	(56)	14,491	
Other customers	326	(5)	321	36	(1)	35	
Balance as at 31 December	258,876	(16,193)	242,683	199,068	(12,386)	186,682	

A reconciliation of allowance for impairment of loans and advances to customers is as follows:

In thousands of EUR	2011	2010
Balance as at 1 January	12,386	7,940
Charge for the year, net of recoveries	5,545	6,648
Write off	(1,738)	(2,202)
Balance as at 31 December	16,193	12,386

Analysis of loans and advances to customers by sector is as follows:

In thousands of EUR	2011	2010
Agriculture	424	460
Building construction	1,251	1,328
Trade	34,630	27,675
Tourism	7,253	7,381
Production	2,926	555
Transportation	5,678	8,277
Administration and other public services	27,523	5,301
Retail	132,423	115,812
Other	46,768	32,279
Less: Allowance for impairment	(16,193)	(12,386)
Balance as at 31 December	242,683	186,682

The Bank manages its exposure to credit risk by applying a range of control measures including: regular assessments using agreed credit criteria and diversification of sector risk to avoid undue concentration in any particular type of business or geographic location. The Bank obtains security in the form of mortgages, guarantees and pledges in order to reduce the level of credit risk.

For loans granted to individuals weighted average interest rate was 13.26% p.a. and for loans granted to companies weighted average interest rate was 9.19% p.a.

As disclosed in Note 21, the Bank assigned to the EFSE Luxemburg as collateral for loans granted from the EFSE loan fund of EUR 7,895 thousand relating to all present and future payment claims and all other rights which relate to any Sub-Loan refinanced under Framework Agreement between the Bank and EFSE Luxembourg and any rights and claims arising from any collateral or guarantee granted either by the Sub-Borrower or any other obligor as a security for such Sub-Loan.

Finance lease receivables

Loans and advances to customers include the following finance lease receivables:

In thousands of EUR	2011	2010
More than five years	133	234
Between one and five years	1,345	2,994
Less than one year	1,923	2,168
Gross investment in finance leases, receivable	3,401	5,396
Unearned future income on finance leases	(308)	(610)
Net investment in finance leases	3.093	4,786

Future minimum lease payments receivable, unearned future income and the net investment in finance lease by maturity as at 31 December 2011 and 2010 are as follows:

		2011	
In thousands of EUR	Gross	Unearned	Investment
In inousands of LOR			
	Investment	income	in the lease
Less than one year	1,923	(166)	1,757
Between one and five years	1,345	(127)	1,218
More than five years	133	(15)	118
Investment in finance leases at end of year	3,401	(308)	3,093
		2010	
In thousands of EUR	Gross	Unearned	Investment
	investment	income	in the lease
Less than one year	2,168	(298)	1,870
Between one and five years	2,994	(289)	2,705
More than five years	234	(23)	211
Investment in finance leases at end of year	5,396	(610)	4,786

15. FINANCIAL ASSETS AVAILABLE FOR SALE

In thousands of EUR	2011	2010
Debt instruments - Eurobonds of the Ministry of Finance of the		
Government of Montenegro	16,232	10,447
Equity instruments	36	35
Balance as at 31 December	16,268	10,482

16. FINANCIAL ASSETS HELD TO MATURITY

In thousands of EUR	2011	2010
Treasury bills of the Ministry of Finance of the Government of Montenegro	6,346	2,376
Balance as at 31 December	6,346	2,376

17. PROPERTY AND EQUIPMENT

The movements in tangible assets for the year were as follows:

In thousands of EUR	Buildings	Computers	Other assets	Total
As at 31 December 2010	3,061	1,137	4,601	8,799
Additions	-	150	650	800
Write-off	-	(40)	(46)	(86)
Other	-	-	6	6
As at 31 December 2011	3,061	1,247	5,211	9,519
Accumulated depreciation				
As at 31 December 2010	340	604	2,214	3,158
Depreciation for the year	73	193	518	784
Write-off	-	(39)	(40)	(79)
Other	-	-	6	6
As at 31 December 2011	413	758	2,698	3,869
Net Book Value as at 31 December 2011	2,648	489	2,513	5,650
Net Book Value as at 31 December 2010	2,721	533	2,387	5,641

The last valuation of the Bank's buildings was performed in 2010. Had the Bank carried buildings under the cost model the net carrying value of the revalued buildings would amount to EUR 1,898 thousand as of 31 December 2011 (31 December 2010: EUR 1,949 thousand).

18. INTANGIBLE ASSETS

The movements in intangible assets for the year were as follows:

			Other	
	Computer	Purchased	intangible	
In thousands of EUR	Software	Licenses	assets	Total
Cost				
As at 1 January 2010	1,111	90	206	1,407
Additions	9	-	-	9
As at 31 December 2010	1,120	90	206	1,416
Additions	26	136	-	162
As at 31 December 2011	1,146	226	206	1,578
Accumulated amortization				
As at 1 January 2010	493	90	206	789
Charge for the year	200	-	-	200
As at 31 December 2010	693	90	206	989
Charge for the year	165	11		176
As at 31 December 2011	858	101	206	1165
Net Book Value as at				
31 December 2010	427	-	-	427
Net Book Value as at				
31 December 2011	288	125	-	413

19. OTHER ASSETS

In thousands of EUR	2011	2010
Accrued commissions	184	90
Prepaid expenses	275	371
Assets received on foreclosed loans	442	451
Positive fair value of call option	6	6
Other	318	261
	1,225	1,179
Less: Allowance for impairment	(143)	(14)
Balance as at 31 December	1,082	1,165

20. DEPOSITS FROM CUSTOMERS

2011	2010
58,761	55,407
104,059	75,085
1,752	1,401
164,572	131,893
	58,761 104,059 1,752

Demand deposits include current account balances of enterprises, citizens and other customers.

21. OTHER BORROWED FUNDS

In thousands of EUR	2011	2010
Current (due within one year)	14,664	13,394
Non-current (due after one year)	73,917	66,131
Accrued interest	797	579
Deferred origination fees	(226)	(282)
Balance as at 31 December	89,152	79,822

Borrowings include loans from EFSE Luxembourg in the amount of EUR 7,895 thousand (2010: EUR 9,925 thousand), The Bank assigned to the EFSE Luxemburg as collateral for these loans all present and future payment claims and all other rights which relate to any Sub-Loan refinanced under Framework Agreement between the Bank and EFSE Luxembourg and any rights and claims arising from any collateral or guarantee granted either by the Sub-Borrower or any other obligor as a security for such Sub-Loan.

Current borrowings include possible early repayment of KFW loan in amount of EUR 9.545 thousand.

22. DEBIT SECURITIES

Debt securities issued as of 31 December 2011 in the amount of EUR 15,015 (2010: nil) relate to 15,000 bills of nominal value of EUR 1,000 issued on 10 March 2011. These bills mature on 10 March 2016 and were fully purchased by Erste & Steiermarkische Bank D.D. Croatia.

23. OTHER LIABILITIES

In thousands of EUR	2011	2010
Accrued expenses	484	180
Accrued employee benefits	899	698
Provision for long term employee benefits	131	110
Provision for contingent liabilities	427	136
Provision for legal claims	99	187
Provision for operating risk	118	58
Items in course of collection and other liabilities	515	199
Balance as at 31 December	2,673	1,568

Provision for long-term employee benefits relates to upon retirement benefits payable in an amount equal to six average monthly salaries in the Bank. Provision for retirement benefits is calculated by independent actuary. The liability recognized in the balance sheet is the present value of the obligation, determined by discounting estimated future outflows using the projected unit credit method. The actuary used discount rate of 7.25% (2010: 7,875%) and expected increase in salaries of 5% (2010:5%) and personnel turnover rate of 2.87% (2010: 2.91%).

A reconciliation of provision for long term employee benefits is as follows:

In thousands of EUR	2011	2010
Balance as at 1 January	110	146
Additions:		
- service costs	21	19
- interest costs	7	7
Actuarial gains	(7)	(62)
Balance as at 31 December	131	110

Provision for contingent liabilities relates to the following:

In thousands of EUR	2011	2010
Issued guarantees	213	34
Credit commitments:		
- overdrafts	93	44
- credit cards	56	43
- project financing	65	15
Balance as at 31 December	427	136

A reconciliation of provision for contingent liabilities is as follows:

In thousands of EUR	2011	2010
Balance as at 1 January	136	210
Additions/(reversals)	291	(74)
Balance as at 31 December	427	136

24. SHAREHOLDER'S EQUITY

In thousands of EUR	2011	2010
Share capital	5,339	5,339
Share premium	1,571	1,571
General risk reserves	182	182
Other capital reserves	300	300
Fair value reserves	(1,188)	237
Revaluation reserves	677	698
Retained earnings	20,789	17,078
Balance as at 31 December	27,670	25,405

Share capital

As at 31 December 2011, the Bank's share capital comprised 5,339 ordinary shares of individual par value of EUR 1,000 each.

Share premium

Share premium represents the amount by which the issue price of the shares exceeded their accounting par value.

General risk reserves

General risk reserves relate to reserves for operational risks equal to 0.1% of total assets (2010: 0.1% of total assets). These reserves are recognized in income statement and reported as liabilities in the financial statements prepared under regulations of the Central Bank of Montenegro.

Other capital reserves

Other capital reserves represent amounts allocated from retained earnings based on decision of the Bank's General Assembly.

Fair value reserves

This reserve comprises changes in fair value of financial assets available for sale.

Revaluation reserves

Revaluation reserves represent surplus on revaluation of property. The revaluation surplus is transferred to retained earnings as the assets are depreciated.

Retained earnings

Retained earnings represent accumulated net profits, as well as income and expenses recognized in other comprehensive income brought forward.

Dividends

The Board of Directors of the Bank did not declare dividends for the year 2011.

25. CONTINGENT LIABILITIES AND COMMITMENTS

The Bank provides guarantees, overdraft loans, finance lease and limits on credit cards. These agreements have fixed limits and generally extend for a period up to one year. The contractual amounts of contingent liabilities are set out in the following table by category. The amounts reflected in the table for guarantee, overdraft loans and credit card limits represent the maximum accounting loss that would be recognized at the balance sheet date if counterparties failed completely to perform as contracted.

In thousands of EUR	2011	2010
Guarantees	10,333	3,314
Unused overdraft limit on loans	7,952	4,014
Unused project financing limit on loans	3,424	523
Credit cards	3,333	3,472
Provisions for impairment of contingent liabilities	(427)	(136)
Balance as at 31 December	24,615	11,187

Legal claims

On the statement of financial position date, the Bank is involved in 59 court cases as defendant. The Bank made a provision for the value of possible compensation on legal claims estimated at EUR 99 thousands (2010: 187).

Operating lease commitments

Future minimum lease payments under non-cancellable operating leases as at 31 December are as follows:

In thousands of EUR	2011	2010
Commitments due within one year	507	613
Commitments due in period from 1 to 5 years	1,170	1,524
Commitments due after 5 years	21	148
Balance as at 31 December total	1,698	2,285

26. RELATED PARTY TRANSACTIONS

As disclosed in Note 1, the Bank is owned by Erste & Steiermarkische Bank D.D. Croatia and ultimately owned by Erste Group Bank AG, Vienna, Austria. In the course of its business, the Bank has entered into various transactions with related parties. The Bank's related parties are: immediate parent company, ultimate parent company and other Erste group entities, and key members of management.

A summary of the Bank's transactions with the Erste Group Bank entities were as follows:

In thousands of EUR	2011	2010
Assets		
Current accounts with foreign banks	2,015	4,702
Other assets	11	15
	2,026	4,717
Liabilities		
Demand deposits	494	176
Term deposits	2,534	-
Borrowings	71,555	46,000
Other liabilities	15	326
	74,598	46,502
Income		
Interest and similar income	6	17
Fee and commission income	243	191
Other operating income	-	15
	249	223
Expenses		
Interest and similar expenses	2,660	1,306
Fee and commission expenes	37	9
Other administrative expenses	3	1
	2,700	1,316

The above stated amounts include following amounts relating to Erste & Steiermarkische Bank D.D. Croatia

In thousands of EUR	2011	2010
Assets		
Current accounts with foreign banks	1,891	3,675
Other assets	11	15
	1,902	3,690
Liabilities		
Borrowings	15,015	-
Accrued interest	-	10,007
Other liabilities	15	16
	15,030	10,023
Income		
Interest and similar income	5	10
Fee and commission income	57	18
Other operating income	-	15
	62	43
Expenses		
Interest and similar expenses	703	11
Fee and commission expenses	1	6
Other administrative expenses	3	1
	707	18

Compensation to and other transactions with key management personnel of the Bank

In 2011 the Bank paid to top management personnel gross salaries and other compensations in the amount of EUR 798 thousand (2010: EUR 470 thousand) which include bonuses in the amount of 313 thousand (2010: EUR 38 thousand).

The year end balances of loans to and deposits from members of the Board of Directors were as follows:

In thousands of EUR	2011	2010
Assets		
Loans	1	19
Liabilities		
Demand deposits	28	34
Demand deposits Indexed deposits	39	29
· · ·	67	63

The Bank did not grant new loans to the members of the Board of Directors during 2011 (2010: 7 thousand). The outstanding balance as at 31 December 2011 for previously granted loans to the Board of Directors amounted to EUR 1 thousand (2010: EUR 19 thousand).

The Bank did not grant any loans to the local management personnel

who are not members of the Board of Directors. The outstanding balance as at 31 December 2011 for granted loans amounted to EUR 38 thousand (2010: EUR 53 thousand). Interest income on granted loans to management personnel in 2011 amounted to EUR 3 thousand (2010: EUR 3 thousand).

Outstanding balances due from related parties at the year-end are unsecured. There have been no guarantees provided or received for any related party receivables or payables. For the year ended 31 December 2011, the Bank has not made any provisions for doubtful debts relating to amounts owned by related parties (2010: nil).

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NOTES TO THE FINANCIAL STATEMENTS

FINANCIAL ASSETS AND LIABILITIES - ACCOUNTING CLASSIFICATION AND FAIR VALUES 27.

The table below sets out the Bank's classification of financial assets and liabilities, and their fair values:

Stated at Lized cost Fair value 18,508 18,508 13.343 13.343		220,909 231,391 131,893 131,893 79,822 79,822	211,715 211,715 23,327 23,327 3,626 3,626 3,626 3,626 242,683 242,683 6,346 6,346	275,982 292,250 54 54 54 164,572 164,572 89,152 89,152 89,152 253,779
Stated at fair Stated at value amortized cost - 13,343	- 18 10,482	10,482 23 - 13 - 13	16,268 21	16,268 21 - 16 - 16 - 16 - 21 - 21 - 21 - 21 - 21 - 21 - 21 - 21
Total carrying value 18,508 13.343	186,682 10,482 2,376	231,391 131,893 79,822	211,715 23,327 3,626 3,626 16,268 16,268 6,346	292,250 54 164,572 89,152 253.778
In thousands of EUR As at 31 December 2010 Cash and balances with banks and Central bank Loans and advances to Banks. net	Loans and advances to customers, net Financial assets available for sale Financial assets held to maturity	Deposits from banks Deposits from customers Other borrowed funds	As at 31 December 2011 Cash and balances with banks and Central bank Loans and advances to Banks, net Loans and advances to customers, net Financial assets available for sale Financial assets held to maturity	Deposits from banks Deposits from customers Other borrowed funds

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27. FINANCIAL ASSETS AND LIABILITIES -ACCOUNTING CLASSIFICATION AND FAIR VALUES

Assets recorded at fair value

Financial assets available for sale as at 31 December 2011 in the amount of EUR 16,232 thousand (2010: 10,477) are stated at fair value determined using valuation techniques for which all inputs which have a significant effect on the recorded fair value are observable, either directly or indirectly (Level 2) and in the amount of EUR 36 thousand (2010: EUR 35 thousand) at fair value determined using techniques which use inputs which have a significant effect on the recorded fair value that are not based on observable market data (Level 3).

Assets not recorded at fair value

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

Assets for which fair value approximates carrying value

For financial assets and financial liabilities that are liquid or having a short term maturity (less than one year) it is assumed that the carrying amount approximate their fair value. This assumption is also applied to demand deposits, saving accounts without a specific maturity and variable rate financial instruments.

Fixed rate financial instruments

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

28. FINANCIAL RISK MANAGEMENT

Introduction and overview

The main objectives of Bank's risk management framework are the following:

- Contribute to development of various business lines optimising their overall risk adjusted profitability;
- Bank should be very qualitative and competitive entity at the Montenegrin market, including part of foreign clients without neglecting the quality of loan portfolio and efficient risk control;
- Guaranteeing the Bank's sustainability through the implementation of qualitative risk management infrastructure.

The Bank's risk management model depends on:

- Strong management influence, from Board of Directors to local operational teams;
- Strong internal procedures and guidelines framework;
- Continuous supervision by independent bodies.

Traditionally, the Bank is mainly exposed to credit risk and consequently the largest focus is given to the management and continuous development and improvement of credit risk management, but not neglecting in any instance of other risks the Bank is exposed to in its activities such as liquidity risk, operational risk, market risks, legal risk, reputation risk and the like.

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

The Board of Directors has overall responsibility for the establishment and oversight of the Bank's risk management framework. The Board has established the Asset and Liability Committee (ALCO), Credit Committees and Audit Committee which are responsible for developing and monitoring Bank risk management policies in their specified areas. The Board of Directors consists of executive director's representatives, shareholders representatives and other members.

The Bank's risk management policies are established to identify

and analyze the risks faced by the Bank, to set appropriate risk limits and controls, and to monitor risks and adherence to limits. Risk management policies and systems are reviewed regularly to reflect changes in market conditions, products and services offered. The Bank, through its training and management standards and procedures, aims to develop a disciplined and constructive control environment, in which all employees understand their roles and obligations.

Board of Directors adopted following policies:

- Policies and procedures for management of the credit risk;
- Policies and procedures for management of the liquidity risk;
- Policies and procedures for management of the market risks;
- Policies and procedures for management of the country risk;
- Policies and procedures for management of the operational risks;
- Risk provisioning policy.

Risk policies cover all aspects of the respective type of risk and requirements, quantitative limitations with regard to risk management, risk control as well as, if applicable, performance control, accounting and also regulatory requirements..

The Bank's Internal Audit monitors compliance with the Bank's risks management policies and procedures and undertakes both regular and ad-hoc reviews of risk management controls and procedures, the results of which are reported to the Audit Committee.

According to the Law on Banks, the Bank complied with all requirements relating to corporate governance. Requirements relate to election of the members of the Board of Directors, election of executive directors and formation of audit committee.

The Bank's Audit Committee is responsible for analyzing the Bank's financial reports, analyzing and monitoring the system of internal controls, activities undertaken by executive directors in order to inform Board of Directors, compliance with law, regulations and the Bank's acts. Audit Committee is assisted in these functions by Internal Audit. Internal Audit undertakes both regular and ad-hoc reviews of risk management controls and procedures, the results of which are reported to the Bank Audit Committee.

Credit risk

Credit risk is the risk of financial loss occurring as a result of counterparty's default regarding its contractual obligations to the Bank.

To manage the level of credit risk, the Bank:

- reviews the creditworthiness of customers applying for loans, guarantees and other credit products,
- establishes credit limits on the basis of the risk assessment,
- deals with counterparties of good credit standing and takes appropriate collateral.

Customers are monitored continually and risk limits are adjusted if necessary. Risk limits also take into account various collateral types.

The Bank's primary exposure to credit risk arises through its loans granted to small and medium sized companies and individuals. The amount of credit exposure in this regard is represented by the carrying amounts of the assets on the balance sheet.

Basic principles of loan portfolio are:

- Diversification of loans by industries;
- Diversification within the industry and region;
- Diversification by exposure (limit, individual and group);
- Diversification by maturity;
- Diversification by products.

In accordance with the Central Bank of Montenegro regulations, the total amount of loans and receivables including off balance sheet liabilities, that relate to one client or the group of related clients cannot exceed 25% of bank's own funds. Exceptions are exposures to the Government of Montenegro and Governments and Central banks of OECD countries rated BBB+ or better by S&P or exposures unconditionally guaranteed by the Government of Montenegro or governments and Central banks fulfilling above condition.

According to regulation exposure to one client or the group of related clients that exceeds 10% of bank's own funds is considered as large exposure.

Loans to individuals and loans to companies are granted through 7 Credit committees depending on level of exposure and level of non secured exposure.

The Risk management department continuously monitors and measures the level of credit risk and prepares monthly reports on the level of credit risk and reports it to management and the Board of Directors. The credit quality of financial assets is managed by the bank using internal credit ratings. The table below shows the credit quality by class of asset for all financial assets exposed to credit risk, based on the bank's internal credit rating system. The amount presented are gross of impairment allowances.

The credit quality of financial assets is managed by the bank using internal credit ratings. The table below shows the credit quality by class of asset for all financial assets exposed to credit risk, based on the bank's internal credit rating system. The amount presented are gross of impairment allowances.

Credit risk (continued)

31 December 2011	Neither past	t due nor impai	red			
		Management		Past due but	Individually	
	Low Risk	Attention	Substandard	not impaired	impaired	Total
	2011	2011	2011	2011	2011	2011
Loans and advances to						
banks, gross	3,628	-	-	-	-	3,628
Loan and advances to						
customers, gross	173,883	31,550	3,365	26,899	23,179	258,876
public sector	44,122	12,596	-	7	-	56,725
commercial customers	29,093	17,290	3,152	9,189	9,401	68,125
other financial institutions	-	1,277	-	-	-	1,277
private customers	100,359	377	213	17,696	13,778	132,423
other	309	10	-	7	-	326
Investment securities						
AfS and HtM	22,614	-	-	-	-	22,614
Financial assets						
available for sale	16,268	-	-	-	-	16,268
Financial assets held to						
maturity	6,346	-	-	-	-	6,346

31 December 2010	Neither past	t due nor impai	red			
		Management		Past due but	Individually	
	Low Risk	Attention	Substandard	not impaired	impaired	Total
	2010	2010	2010	2010	2010	2010
Loans and advances to						
banks, gross	13,350	-	-	-	-	13,350
Loan and advances to						
customers, gross	130,479	18,652	4,966	27,791	17,180	199,068
public sector	10,959	1,588	-	-	-	12,547
commercial customers	31,723	15,930	4,509	6,801	6,404	65,367
other financial institutions	4,246	706	-	354	-	5,306
private customers	83,551	407	447	20,631	10,776	115,812
other	-	21	10	5	-	36
Investment securities						
AfS and HtM	12,858	-	-	-	-	12,858
Financial assets						
available for sale	10,482	-	-	-	-	10,482
Financial assets held to						
maturity	2,376	-	-	-	-	2,376

Credit risk (continued)

Past due loans and advances include those that are only past due by a few days. An analysis of past due loans, by age is provided in the following tables.

31 December 2011	Less than 30 days 2011	31 to 60 days 2011	61 to 90 days 2011	61 to 90 days 2011	Total 2011
Loan and advances to					• < 000
customers, gross	13,663	5,456	7,780	-	26,899
public sector	-	7	-	-	7
commercial customers	2,097	1,280	5,812	-	9,189
other financial institutions	-	-	-	-	-
private customers	11,559	4,169	1,968	-	17,696
other	7	-	-	-	7

31 December 2010	Less than 30 days 2010	31 to 60 days 2010	61 to 90 days 2010	61 to 90 days 2010	Total 2010
Loan and advances to customers, gross	16,952	7,920	2,919	-	27,791
public sector	-	-	-	-	-
commercial customers	3,916	2,150	735	-	6,801
other financial institutions	354	-	-	-	354
private customers	12,677	5,770	2,184	-	20,631
other	5	-	-	-	5

See Note 14 for more detailed information on the allowance for impairment losses on loans and advances to customers.

Impairment

The Bank establishes an allowance for impairment losses that represents its estimate of incurred losses in its loan portfolio. The main components of this allowance is a specific loss component that relates to individually significant exposures, and a collective loan loss allowance established for groups of homogeneous assets in respect of losses that have been incurred but have not been identified on loans subject to individual assessment for impairment.

The Bank grades credit risk exposures to individuals into various categories in groups A, B (performing assets) and C, D and E (non-performing assets). The Bank grades credit risk exposures to companies into various categories in groups 1-8 (performing assets), where 1 is extremely high creditworthiness and 8 is below standard, and R1-R5 (non-performing assets), where R1 is uncertain collection, R2 is past due over 90 days, R3 are restructured assets, R4 is write off and R5 - bankruptcy. The Bank estimates recoverable amounts by discounting future cash flows on individual level for all individually significant exposures classified in the non performing categories. Collective provisions for performing categories are based

on estimations of probabilities of default and losses given default for corporate and retail exposures using its own historical data..

The classification of assets into the risk categories A to E for individuals is briefly outlined as follows:

Category A - good assets; includes items which are expected to be fully collected in accordance with the agreed terms;

Category B - assets with the special remark include items that have low probability of loss. These items require special remark of the Bank as a result of potential risk that would arise in case it is not

adequately monitored and therefore has weaker prospects in terms of full collection;

Category C - substandard assets include items that have high probability of loss as a result of obvious loss indicators that influence collection of payments;

Category D - Doubtful assets include items for which collection is unlikely, considering creditworthiness of the borrower, collateral value and possibility of collateral foreclosure;

Category E – Loss include items that are entirely uncollectable or will be collected in insignificant amount.

Individually impaired loans and securities

Individually impaired loans and securities are loans and securities for which the Bank determines that it is probable that it will be unable to collect all principal and interest due according to the contractual terms of the loan and securities agreement. These loans are graded C to E for individuals or R for companies in the Bank's internal credit risk grading system.

Set out below is an analysis of the gross and net (of allowances for impairment) amounts of individually impaired assets by risk grade.

In thousands of EUR	Loan and advances	
	to customers Gross	Net
Category C	5,088	3,317
Category D	8,581	5,362
Category E	8,647	2,207
Total as at 31 December 2011	22,316	10,886
Category C	6,205	3,712
Category D	5,336	3,468
Category E	5,535	1,121
Total as at 31 December 2010	17,076	8,301

Past due but not impaired loans

Loans and securities where contractual interest or principal payments are past due but the Bank believes that impairment is not appropriate on the basis of the level of security/collateral available and/or the stage of collection of amounts owed to the Bank.

Loans with renegotiated terms

Loans with renegotiated terms amounted to EUR 6,289 thousand as at 31 December 2011 (2010: EUR 4,635 thousand).

Credit risk (continued)

Write-off policy

The Bank writes off a loan balance when determines that the loans are uncollectable. This determination is reached after considering information such as the occurrence of significant changes in the borrower financial position such that the borrower can no longer pay the obligation and there is no perspective that will pay in the future and there is no qualitative collateral. For smaller balance standardized loans, secured mainly with guarantors and there is no payment from guarantors, charge off decisions generally are based on a product specific past due status. These loans are graded E (citizens) or R4 (companies) in the Bank's internal credit risk grading system.

Unrecoverable borrowings E, R4 are those where it is considered that the total receivables will not be recovered by primary or secondary cash flow. Concerning unrecoverable placements E, R4, by default the present value of these receivables equals zero, except when there is a very good collateralization of approved loan.

Written off loans that are considered irrecoverable and which are registered in the off balance sheet records of the Bank amount to EUR 4,676 thousand as of 31 December 2011 (2010: EUR 3,705 thousand).

Collateral

The amount and type of collateral depend on an assessment of the credit risk of the counterparty.

The Bank holds collaterals against loans and advances to customers in the form of mortgage interests over property, pledge, guarantors and bill of exchange. Estimates of fair value are based on the value of collateral assessed at the time of borrowing, and generally are not updated except when a loan is individually assessed as impaired. Collateral generally is not held over loans and advances to banks. Collateral usually is not held against investment securities and no such collateral was held at 31 December 2011 or 2010.

Credit risk (continued)

Collateral (continued)

An estimate of the fair value of collateral and other security enhancements held against financial assets is shown below:

	Loan and advances	
In thousands of EUR	to customers	
	2011	2010
Against individually impaired - property	9,788	5,017
Against collectively impaired:		
Property	114,016	82,705
Other pledges	12,566	6,841
Montenegro Government guarantees	52,967	32,624
Guarantee of banks with rating A or more	-	27
Against past due but not impaired – ca deposits	98	161
Against neither past due nor impaired – cash deposits	2,214	1,815
Total	191,649	129,190

Collateral values above do not include co-guarantors that the Bank may use as security for loans and advances.

It is the Bank's policy to dispose of reposed collateral in an orderly fashion. The proceeds are used to reduce or repay the outstanding claim. In general, the Bank does not occupy repossessed properties for business use.

During the year the Bank took possession of collateral with a carrying value of EUR 354 thousand (2010: EUR 437 thousand) at the statement of financial position date, which the Bank is in process of selling.

Credit risk concentrations

The Bank monitors concentrations of credit risk by industry sector to mitigate its risk and diversify its portfolio. An analysis of concentrations of credit risk at the reporting date is shown below:

In thousands of EUR	Loan and advances to customers		Debt securities (HTM and AFS)	
	2011	2010	2011	2010
Retail customers	121,492	106,725	-	-
Corporate customers	63,173	62,171	-	-
Other financial institution	1,236	5,261	-	-
Government	56,461	12,491	22,578	12,823
Other	321	34	36	35
	242,683	186,682	22,614	12,858

Industrial risk concentrations are presented in Note 14.

The maximum credit exposure to any customer (apart from the Government or the Government guaranteed and other banks) as at 31 December 2011 was EUR 5,052 thousand (2010: EUR 3,299 thousand).

Country risk

Country risk is the probability of incurring losses to the bank due to the inability of persons or companies outside of Montenegro to repay obligations due to political, social and economic environment of the country of the debtor. Risks include:

- Political-economic risk, where loss is probably due to political restrictions created by the acts of the country, state bodies or other bodies in the country of the debtor, and/or because of the general economic condition in the country;
- Transfer risk, where probability of loss due to currency restrictions created by the acts of the country, state bodies or other bodies in the country of the debtor, and/or because of the general economic condition in the country.

Risk management department monitors risk on an ongoing basis and recommends any needed changes in order to keep the policy and procedures in line with the Bank's strategy and goals.

Risk management department submits to the Board monthly reports about country risk exposure.

The Board of Directors reviews the adequacy of the system used to manage country risk and approve any policy changes if needed.

Liquidity risk

Liquidity risk arises in the general funding of the Bank's activities and in the management of its liquidity position. It includes both the risk of being unable to fund assets at appropriate maturities and rates and the risk of being unable to liquidate an asset at a reasonable price and in an appropriate time frame.

The Bank has access to a diverse funding base. Funds are raised using:

- deposits with wide ranges of maturity;
- long term borrowings;
- share capital.

The Bank's general policy aim is to manage liquidity risk in order to meet its obligations associated with its financial liabilities and to increase its liquidity level. The Bank continually assesses liquidity risk by identifying and monitoring changes in funding required meeting business goals and targets set in terms of the overall Bank's strategy.

The daily liquidity position is monitored by Risk department and Treasury department which have formal procedures. Control of liquidity level is necessary in order to maintain liquidity risk on acceptable level. The Bank follows its internal and legal limits prescribed by the Central Bank of Montenegro.

The table below presents undiscounted assets and liabilities by earliest remaining contractual maturities.

Liquidity risk (continued)

Repayments which are subject to notice are treated as if notice were to be given immediately.

However, the Bank expects that many customers will not request repayment on the earliest date the Bank could be required to pay and the table does not reflect the expected cash flows indicated by the Bank's deposit retention history.

					Total undiscounted
				More	financial
	Up to 3	3 months	1 to 5	than 5	assets/
In thousands of EUR	months	to 1 year	years	years	liabilities
Non derivative assets					
Cash and cash equivalents	21,039	-	5,916	-	26,955
Loans and advances to customers	27,557	61,910	219,742	128,559	437,768
Financial assets available for sale	-	-	17,036	-	17,036
Financial assets held to maturity	2,538	3,910	-	-	6,448
Total as at 31 December 2011	51,134	65,820	242,694	128,559	488,207
Non derivative liabilities					
Deposits from banks	54	-	-	-	54
Deposits from customers	82,026	59,793	10,005	16,492	168,316
Other borrowed funds	2,089	14,455	58,915	30,995	106,454
Debt securities	-	677	16,983	-	17,660
Total as at 31 December 2011	84,169	74,925	85,903	47,487	292,484

The table below shows an analysis of the Bank's financial assets and liabilities analysed according to when they are expected to be recovered or settled.

	Up to	More than	
In thousands of EUR	1 years	1 years	Total
	Assets		
Cash and cash equivalents	17,411	5,916	23,327
Loans and advances to Banks	3,626	-	3,626
Loans and advances to customers	81,565	177,311	258,876
Financial assets available for sale	-	16,268	16,346
Financial assets held to maturity	6,346	-	6,346
Total as at 31 December 2011	108,950	199,495	308,445
	Liabilities		
Deposits from banks	54	-	54
Deposits from customers	79,128	85,447	164,572
Other borrowed funds	15,317	73,835	89,152
Debt securities	-	15,015	15,015
Total as at 31 December 2011	94,496	174,298	268,794

Market risks

Market risk is the risk that changes in market prices, such as interest rate, equity prices and foreign exchange rates will affect the Bank's income or value of its holdings of financial instruments. The objective of market risk management is to manage and control market risk exposures within acceptable parameters, while optimizing the return of risk.

Management of market risk

Management of market risk is one of the main Bank's aims in order to limit potential losses caused by adverse changes in interest rates, currency risks, prices index and other market factors that could influence the value of financial instruments, impacting profitability and the capital adequacy of the Bank.

Market risk is monitored by the Risk management department. The Bank's system for managing the market risk consists of:

- Identification of current market risk and possible risks from new business activities;
- Measure of market risks through established mechanism and procedures for correct and updated market risk estimate;
- Monitoring market risk through analyzing of its status, changes and trends;
- Control of market risk by managing risk at level acceptable for risk profile of the Bank.

The Bank manages all market risks to which it is exposed, especially:

- Interest rate risk;
- Currency risk and
- Placement risk.

Interest rate risk

The Bank's operations are subject to the risk of interest rate fluctuations to the extent that interest-earning assets and interestbearing liabilities mature at different times or in differing amounts.

Risk management activities are aimed at optimizing net interest income, given market interest rate levels consistent with the Bank's business strategies.

In managing interest rate structure, senior management considers among others:

- macro and micro economic forecasts;
- forecasts in liquidity conditions and
- the anticipated trends in interest rates.

The Bank takes on exposure to the effects of fluctuation in the prevailing levels of market interest rates on its financial position and cash flows. Interest margins may increase as a result of such changes or may reduce creating losses in the event that unexpected movements by reprising periods arise. The Board of Directors sets limits on the level of mismatch of interest rate re-pricing that may be undertaken, which is monitored daily. The table below summarizes the Bank's exposure to interest rate movements.

NOTES TO THE FINANCIAL STATEMENTS

28. FINANCIAL RISK MANAGEMENT (continued)

Management of market risk (continued)

Interest rate risk (continued)

Exposure to interest rate movements: This analysis has been provided on basis of interest reset period or maturity date whichever is earlier.

In thousands of EUR As at 31 December 2011	Carrying amount	Up to 3 months	3 months to 1 year	1-5 years	More than 5 years	Non interest sensitive	Impairment
Assets Cash and balances with banks Loans and advanced to Banks Loans and advances to customers Financial assets available for sale Financial assets held to maturity	23,327 3,626 242,683 16,268 6,346	2,837 - 2,525	82,319 3,821	85,767 16,268	40,569	20,490 3,628 10,310 -	(2) (16,193)
Total Liabilities Deposits from banks Deposits from customers Other borrowed funds Debt securities	292,250 54 164,573 89,152 15,015	45,273 54 81,853 46,948	86,140 - 58,067 24,369 15,015	102,035 8,716 9,084	40,569 2,183 8,751	34,428 13,754 -	(16,195) - -
Total	268,794	128,855	97,451	17,800	10,934	13,754	.
Interest rate gap As at 31 December 2010 Assets	23,456	(83,582)	(11,311)	84,235	29,635	20,674	(16,195)
cash and balances with banks Loans and advanced to banks Loans and advances to customers Financial assets available for sale Financial assets held to maturity	18,508 13,343 18,682 10,482 2,376 2,376	1,794 - 25,022 - 2,376	71,815	70,783 10,447	25,908	15,714 13,350 5,539 35	(12,385)
Total Liabilities Deposits from Banks Deposits from customers Other borrowed funds	231,391 - 79,822	29,192 - 78,208 40,359	71,815 38,180 14,883	81,230 4,439 17,830	25,908 336 6,750	35,638 - 10,730	(12,392)
Total Interest rate gap	211,715 19,676	118,567 (89,375)	53,063	22,269	7,086	24,908	. (12,392)

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Management of market risk (continued)

Interest rate risk (continued)

The Bank prepares reports in accordance with regulations of the Central Bank of Montenegro for measuring interest rate risk for all positions of assets, liability and off-balance items, as well as for all other compensations or expenditures that are exposed to interest rate risk. Reports prepared in accordance with regulations of the Central Bank of Montenegro are used to measure risk to Net Interest Income (NII) arising from the re-pricing of assets and liabilities over time. The risk is measured upon the size and duration potential movements in interest rates. The bank is aware that maintaining a balanced position for all time periods in a gap reports does not ensure immunity from Interest Rate Risk (IRR). The Bank is aware of the following gap reporting limitations:

- Risk may be hidden in the re-pricing frames;
- Interest rates on assets and liabilities do not always move together;
- Exposure arising from new business.

To avoid such limitations the Bank use simulations (assumptions) with intend of projecting the future composition of the balance sheet and applying different interest rate scenarios. Impact of loan prepayments and early withdrawing of deposits is also taken into account.

Additionally, the Bank is focused on interest rate spreads. Bank is aware that volatility of IRR spread is potential interest rate risk indicator. This spread is managed by loan pricing, deposit pricing, and investing. The Bank strives to have neither the lowest nor the highest loan or deposit rates in the market. Loans are priced in order to achieve a fair return on shareholder investment.

Deposits are priced to provide fair treatment for the Bank's customers and to be reasonably competitive without increasing the Bank's cost of funds.

Management of market risk (continued)

Interest rate risk (continued)

The management of interest rate risk against interest rate gap limits is supplemented by monitoring the net interest income sensitivity of the Bank's financial assets and liabilities to various standard and non-standard interest rate scenarios. Standard scenarios that are considered on a monthly basis to a reasonable possible change in interest rates of 100 basis point (bp) parallel fall or rise in all yield curves in Montenegro. Analysis of the Bank's sensitivity on income statement to an increase or decrease in market interest rates is as follows:

	100 bp	100 bp
In thousands of EUR	parallel increase	parallel decrease
	Increase	uccreuse
As at 31 December 2011		
Average for the period	(423)	423
Maximum for the period	(525)	525
Minimum for the period	(295)	295
As at 31 December2010		
Average for the period	(348)	348
Maximum for the period	(493)	493
Minimum for the period	(219)	219

The sensitivity of equity calculated by revaluing fixed rate available–for– sale financial assets at 31 December 2011, for the effects of the assumed changes in interest rates of 100 bp increase/decrease is EUR 835 thousand decrease/increase. The total sensitivity of equity is based on the assumption that there are parallel shifts in the yield curve.

Currency risk

Currency risk is the risk that the value of a financial instrument will fluctuate due to changes in foreign exchange rates. The Board has set limits on positions by currencies, which are monitored on daily basis.

Since the open positions in USD, CHF and GBP amounted to EUR 93 thousand, EUR 3 thousand and EUR 1 thousand, respectively, the management of the Bank considers that the Bank is currently not significantly exposed to the currency risk.

Placement risk

When determining limits of exposure to the placement risk, the Bank establishes limits of placements, not just as Bank's equity expressed as percentage, but, as fixed limits also, which are at acceptable levels and which are not affected by changes in the Bank's equity.

Operational risk

Operational risk means the probability of incurring losses in the Bank's operations, as a result of inadequate internal processes, controls and systems, weaknesses and errors in performance, illegal actions and external events that may expose the Bank to loss. This includes errors, omissions, systems breakdown, natural disasters, terrorist attack and fraudulent activity, causing an impact in terms of unavailability of services, financial loss, increased costs and loss of reputation or failure to make anticipated income or profit.

Operational risk (continued)

The goal of operational risk management is to balance cost and risk within the constraints of the risk appetite of the Bank, but to be consistent with the prudent management required of a financial organization.

Risk Management priorities are identified through a combination of:

- experience and observation;
- internal audit assessment and knowledge;
- internal controls;
- detailed risk assessment work;
- change management procedures;
- common sense;
- incident reports.

The Bank has established a system for management of operational risks that includes:

- Policies and procedures for managing operational risks which provides identification, measurement, tracking and controlling risks;
- Responsibility for implementation and effectiveness of Operational Risk rests with the Risk Management Department, as well as monitoring and tracking the risk;
- Responsibility for identifying and managing Operational Risk lies with line management;
- Internal Audit is responsible for the completion of an agreed audit program covering all departments and branches, identifying risk and non adherence to procedures, completing special investigations and reporting to the CEO and supervisory board.

Capital management

The Bank's regulator, the Central Bank of Montenegro, sets and monitors capital requirements for the Bank. In implementing current capital requirements the Central bank of Montenegro requires the Bank to maintain a prescribed solvency ratio of 10%.

The regulatory capital of the Bank is classified as:

- Basic capital;
- Supplementary capital I;
- Supplementary capital II.

Basic capital consists of:

- The paid up share capital excluding cumulative preferential shares;
- Premiums realized on issuance (share premium account);
- Reserve allocated from income after taxes (legal, statutory and other reserves);
- Undistributed retained profit from previous years;
- Current profit on which Shareholders assembly made decision

to be included in the basic capital;

Capital gains on purchases and sales of own shares.

Deductible items on basic capital are: losses from current and accumulated losses from prior years, capital losses on purchases and sales of own shares, intangible assets, the outstanding balances of purchased own shares and additional losses assessed in controls of the Central Bank.

Supplementary capital I consist of:

- The nominal amount of cumulative preferential shares;
- General reserves for losses on assets up to 1.25% of risk weighted assets of the bank;
- Subordinated debt according to the Central Bank regulation;
- Hybrid instruments according to the Central Bank regulation;
- Revaluation reserves.

Deductible items on supplementary capital I consist of: outstanding balance of purchased own cumulative preferential shares and liabilities and contingent liabilities secured by hybrid instruments included in Supplementary capital.

Supplementary capital II consists of:

• Subordinated debt according to the Central Bank regulation.

Basic capital and Supplementary Capital I can be used for fulfilling the capital needs for credit, market and operational risk. Supplementary Capital II can only be used for fulfilling the capital needs for market risk, except capital need for settlement risk and counterparty risk.

Bank is obliged to follow the following limitations when calculating regulatory capital:

- Total sum of supplementary capital I and supplementary capital II must not be higher than basic capital;
- Total sum of subordinated debt included in supplementary capital I and the amount of cumulative preferential shares cannot exceed 50% of basic capital;
- To cover capital need for market risk, the Bank can use supplementary capital II, but only up to amount of 150% of basic capital used to cover capital needs for market risk, and which is not used to for covering other types of risks.

The Bank is required to maintain the solvency ratio at the level of at least 10%. The Policy of the Bank is to maintain strong base of capital in order to maintain confidence of market, investors and creditors and for future development.

ERSTE BANK A.D. PODGORICA

NOTES TO THE FINANCIAL STATEMENTS

28. FINANCIAL RISK MANAGEMENT (continued)

Capital management (continued)

The Bank's regulatory capital and capital adequacy is calculated as follows:

In thousands of EUR	2011	2010
Basic Capital		
Share capital	5,339	5,339
Share premium	1,571	1,571
Retained earnings from the previous year	15,708	15,126
Reserves allocated from retained earnings	300	300
Deductible items on basic capital	(413)	(427)
	22,505	21,909
Supplementary capital I		
Subordinated debt	2,000	2,800
Revaluation reserves	677	698
	2,677	3,498
Total regulatory capital	25,182	25,407
Risk weighted assets:		
- balance sheet	129,076	116,272
- off balance sheet	11,341	3,980
Capital charge for:		
- market risks	132	370
 operational risk 	3,417	3,203
- country risk	95	184
- other risks	755	499
Capital Adequacy	14%	16%

The Bank calculates regulatory capital and capital adequacy based on financial statements prepared in accordance with regulations of the Central Bank of Montenegro.

Podgorica, 7 March 2012

Approved by and signed on behalf of Erste Bank A.D., Podgorica

1 Predrag Lalovic Aleksa Lukić FOLIA **Chief Executive Director Executive Director**

Kristina Bukilić Director of Finance and Accounting