

BLOM BANK SAL

SEPARATE FINANCIAL STATEMENTS

31 DECEMBER 2021



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INDEPENDENT AUDITORS' REPORT TO THE SHAREHOLDERS OF BLOM BANK SAL

Adverse opinion

We have audited the separate financial statements of Blom Bank SAL (the "Bank"), which comprise the separate statement of financial position as at 31 December 2021, and the separate income statement, separate statement of comprehensive income, separate statement of changes in equity and separate statement of cash flows for the year then ended, and notes to the separate financial statements, including a summary of significant accounting policies.

In our opinion, because of the significance of matters discussed in the "Basis for adverse opinion" section of our report, the accompanying separate financial statements do not present fairly, in all material respects, the separate financial position of the Bank as at 31 December 2021, its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRSs).

Basis for adverse opinion

1. As disclosed in note 2.1 to the separate financial statements, the Bank did not apply the requirements of IAS 29 – Financial Reporting in Hyperinflationary Economies ("IAS 29") in the accompanying separate financial statements for the year ended 31 December 2021. Had the Bank applied the requirements of IAS 29, many elements and disclosures in the accompanying separate financial statements, including the comparative financial information for the year ended 31 December 2020, would have been materially different. The effects on the separate financial statements from this departure have not been determined. Our opinion for the year ended 31 December 2020 was also modified for the same reason explained above.
2. The Bank translated its assets and liabilities, denominated in foreign currencies, as at 31 December 2021 and all transactions in foreign currencies that occurred during the year then ended, using the official published exchange rates as disclosed in note 1 to the separate financial statements. However, during the year, other exchange rates were introduced through legal exchange mechanisms, and several exchange rates became available, depending on the source and nature of the operation or balance. As per IAS 21, when several exchange rates are available, the rate to be used is that at which the future cash flows represented by the transaction or balance could have been settled if those cash flows had occurred at the measurement date. Due to the uncertainties disclosed in note 1 to the separate financial statements, management did not use the rate at which the future cash flows could have been settled. Had the Bank used the rate at which the future cashflows could have been settled, many accounts and disclosures in the separate financial statements would have been materially different. The effects on the separate financial statements from the departure of IAS 21 and the uncertainties relating to the appropriate exchange rates have not been determined.

Basis for adverse opinion (continued)

3. As disclosed in note 45.3 to the separate financial statements, as at 31 December 2021, the Bank held balances with the Central Bank of Lebanon amounting to LL 24,652 billion (2020: LL 25,482 billion), a portfolio of Lebanese government treasury securities and Certificates of deposits (under financial assets at amortized costs) totaling LL 4,425 billion (2020: LL 4,556 billion), a portfolio of loans to the private sector amounting to LL 1,753 billion (2020: LL 2,901 billion) and other balances with Lebanese banks and other financial assets amounting to LL 71 billion (2020: LL 132 billion) concentrated in Lebanon which represents 86% of the Bank's total assets as at 31 December 2021 (2020: 89%). Furthermore, the Bank did not assess whether the modified financial assets resulting from the exchange of placements with the Central Bank of Lebanon with same maturities but at lower interest rates have changed substantially, in order to determine whether it should be accounted for as a modification resulting in derecognition or no derecognition. Also, the Bank did not calculate and account for the impact of such modification, which constitutes a departure from the requirements of IFRS 9.

As disclosed in note 1, the accompanying separate financial statements do not include adjustments, as required by IFRS 9 – Financial Instruments, to the carrying amount of above assets and to many related accounts and disclosures that would result from resolution of uncertainties described in note 1.

Also, as disclosed in note 40, management did not produce the information about the fair value of these assets and other financial instruments concentrated in Lebanon and these separate financial statements consequently do not include the fair value disclosures in compliance with IFRS 13 – Fair Value Measurement.

Had such adjustments and disclosures been determined and made, many elements and related disclosures in the accompanying separate financial statements for the years ended 31 December 2021 and 31 December 2020 would have been materially different. The effects of the resolution of these uncertainties on the separate financial statements and disclosures have not been determined. Our opinion for the year ended 31 December 2020 was also modified for the same reasons explained above.

4. As disclosed in note 21 to the separate financial statements, the Bank holds investments in Lebanese subsidiaries carried at the equity method at LL 472,255 million (2020: LL 464,239 million), whose operations are mainly concentrated in Lebanon and which are significantly impacted by the events described in note 1. The accompanying separate financial statements do not include adjustments to the carrying amount of these assets and the share of profit of subsidiaries that would result from resolution of the uncertainties described therein. In addition, the Bank did not carry out an impairment test, as required by IAS 36 – Impairment of Assets, on the carrying amount of these investments. The effects of the resolution of these uncertainties on the carrying amounts of these assets have not been determined. Our opinion for the year ended 31 December 2020 was also modified for the same reason explained above.
5. As at 31 December 2021, provision for retirement benefits obligation of employees in Lebanon is carried in the separate statement of financial position at LL 27 billion. The Bank did not estimate the provision for retirement benefits obligations in accordance with IAS 19 – Employee Benefits. Consequently, we were unable to determine whether any adjustments to these amounts, and related income statements accounts were necessary.
6. The events, conditions and practices that would not qualify as normal course of business in a non-crisis environment described in note 1 and the matters described in paragraph 1, 2 and 3 above affect the financial position, liquidity, solvency and profitability of the Bank, expose the Bank to increased litigation and regulatory risks. Significant uncertainty exists in relation to the outcome of the litigations and claims raised against the Bank and the negative impact that they might have on the Bank's offshore liquidity, foreign assets and foreign currency exposure as disclosed in notes 1, 46 and 49. These events and conditions cast significant doubts on the Bank's ability to continue as a going concern. We were unable to obtain sufficient appropriate audit evidence about the Bank's ability to continue as a going concern. Our opinion for the year ended 31 December 2020 was also modified for the same reasons explained above.

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



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Emphasis of matter

We draw attention to note 52 to the separate financial statements, which describes the uncertainties surrounding the legal actions undertaken by the prosecutor of the court of appeal in Mount Lebanon, subsequent to the balance sheet date, on the Bank and some members of its Board of Directors.

Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the separate financial statements for the year ended 31 December 2021. Except for the matters described in the “Basis for adverse opinion” section, we have determined that there are no other key audit matters to communicate in our report

Responsibilities of management and those charged with governance for the separate financial statements

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

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

Those charged with governance are responsible for overseeing the Bank’s financial reporting process.

Auditors’ responsibilities for the audit of the separate financial statements

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

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

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



SEMAAN, GHOLAM & Co.

Auditors' responsibilities for the audit of the separate financial statements (continued)

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

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

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



Ernst & Young
20 April 2022
Beirut, Lebanon



BDO, Semaan, Gholam & Co.

BLOM Bank SAL

SEPARATE INCOME STATEMENT

For the year ended 31 December 2021

	<i>Notes</i>	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Interest and similar income	4	2,516,825	2,923,265
Interest and similar expense	5	(359,160)	(1,257,694)
Net interest income		2,157,665	1,665,571
Fee and commission income		109,222	103,303
Fee and commission expense		(401,781)	(20,795)
Net fee and commission (expense) income	6	(292,559)	82,508
Net loss from financial assets at fair value through profit or loss	7	(785,770)	(121,467)
Net loss from derecognition of financial assets at amortized cost	8	(107)	(73,387)
Share of profit of subsidiaries	21	32,689	84,198
Other operating income	9	27,824	7,141
Total operating income		1,139,742	1,644,564
Net impairment loss on financial assets	10	(678,366)	(1,078,818)
Discounts on loans	19	(43,985)	(58,430)
Net operating income		417,391	507,316
Personnel expenses	11	(177,474)	(155,517)
Other operating expenses	12	(144,563)	(104,803)
Depreciation of property, equipment and right-of-use assets	22	(22,271)	(24,040)
Amortization of intangible assets	23	(673)	(1,012)
Total operating expenses		(344,981)	(285,372)
Operating profits		72,410	221,944
Net gain on disposal of property and equipment		128	3,929
Profit from sale of a subsidiary	21	134,157	-
Profit before tax		206,695	225,873
Income tax expense	13	(234,613)	(240,754)
Loss for the year		(27,918)	(14,881)

The accompanying notes 1 to 52 form part of these separate financial statements.

BLOM Bank SAL**SEPARATE STATEMENT OF COMPREHENSIVE INCOME**

For the year ended 31 December 2021

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Loss for the year	(27,918)	(14,881)
Other comprehensive (loss) income that will be reclassified to the separate income statement in subsequent periods:		
Exchange difference on translation of foreign operations	(44,320)	49,321
Total other comprehensive (loss) income that will be reclassified to the separate income statement in subsequent periods	(44,320)	49,321
Other comprehensive (loss) income that will not to be reclassified to the separate income statement in subsequent periods:		
Net unrealized (loss) gain from financial assets at fair value through other comprehensive income	(4,062)	8,049
Total other comprehensive (loss) gain that will not be reclassified to the separate income statement in subsequent periods	(4,062)	8,049
Other comprehensive (loss) income for the year	(48,382)	57,370
Total comprehensive (loss) income for the year	(76,300)	42,489

The accompanying notes 1 to 52 form part of these separate financial statements.

BLOM Bank SAL


SEPARATE STATEMENT OF FINANCIAL POSITION

At 31 December 2021

	Notes	2021 LL million	2020 LL million
Assets			
Cash and balances with central banks	14	25,798,096	25,871,398
Due from banks and financial institutions	15	677,137	357,092
Due from sister banks	16	18,031	43,185
Derivative financial instruments	17	1,356	2
Financial assets at fair value through profit or loss	18	276,299	71,253
Net loans and advances to customers at amortized cost	19	2,347,022	3,577,884
Net loans and advances to related parties at amortized cost	43	5,364	5,302
Debtors by acceptances		479	2,611
Financial assets at fair value through other comprehensive income		3,238	3,211
Financial assets at amortized cost	20	5,018,332	4,990,148
Investments in subsidiaries	21	1,104,333	1,611,312
Property, equipment and right-of-use assets	22	551,952	565,281
Intangible assets	23	821	1,257
Assets obtained in settlements of debt	24	45,675	50,853
Other assets	25	31,910	30,690
Total assets		35,880,045	37,181,479
Liabilities and equity			
Liabilities			
Due to central banks	26	2,867,872	2,909,639
Due to banks and financial institutions	27	185,614	267,334
Due to sister banks	28	147,462	216,353
Derivative financial instruments	17	1,366	11
Customers' deposits at amortized cost	29	26,766,550	27,884,305
Deposits from related parties at amortized cost	43	509,720	558,466
Debt issued and other borrowed funds	30	38,183	38,168
Engagements by acceptances		551	2,778
Other liabilities	31	695,103	670,470
Provisions for risks and charges	32	143,729	33,810
Total liabilities		31,356,150	32,581,334
Equity			
Share capital - common shares	33	322,500	322,500
Share premium on common shares	33	374,085	374,085
Non distributable reserves	34	2,676,193	2,713,217
Distributable reserves	35	37,696	37,696
Treasury shares	36	(4,434)	(4,434)
Retained earnings		1,246,996	1,474,455
Revaluation reserve of real estate	37	11,842	11,842
Change in fair value of financial assets at fair value through other comprehensive income		3,270	17,910
Foreign currency translation reserve		(116,335)	(332,245)
Result of the year		(27,918)	(14,881)
Total equity		4,523,895	4,600,145
Total liabilities and equity		35,880,045	37,181,479

The separate financial statements were authorized for issue in accordance with a resolution of the Board of Directors on 12 April 2022:


Saad Azhari
Chairman and General Manager


Talal Baba
Chief Financial Officer

The accompanying notes 1 to 52 form part of these separate financial statements.

BLOM Bank SAL

SEPARATE STATEMENT OF CASH FLOWS

For the year ended 31 December 2021

	Notes	2021 LL million	2020 LL million
OPERATING ACTIVITIES			
Profit for the year before income tax		206,695	225,873
Adjustments for			
Depreciation of property, equipment and right-of-use assets	22	22,271	24,040
Amortization of intangible assets	23	673	1,012
Gain from sale of property and equipment		(128)	(3,929)
Profit from sale of a subsidiary	21	(134,157)	-
Interest on lease liabilities		258	298
Provision (write-back of provision) for risks and charges		6,638	(12,293)
Net impairment loss on financial assets	10	678,366	1,078,818
(Write-back of provision) net impairment of assets obtained in settlement of debt	24	(371)	226
Gain on disposal of assets obtained in settlement of debt		(1,021)	(1,922)
Share of profit of subsidiaries	21	(32,689)	(84,198)
Net loss from derecognition of financial assets at amortized cost	8	107	73,387
Uncalized (gain) loss from revaluation of financial assets at fair value through profit or loss	7	(206)	2,698
		<u>746,436</u>	<u>1,304,010</u>
Changes in operating assets and liabilities:			
Due from banks and financial institutions		(75,345)	(36)
Balances with central banks		1,090,545	2,248,619
Due from sister banks		-	(1)
Loans to banks and financial institutions		-	3,045
Derivative financial instruments – debit		(1,354)	1,909
Financial assets at fair value through profit or loss		(204,840)	223,031
Net loans and advances to customers at amortized cost		1,221,011	2,378,650
Net loans and advances to related parties at amortized cost		(62)	7,925
Debtors by acceptances		(95)	(1,882)
Assets obtained in settlement of debt		(9,090)	(11,215)
Other assets		(1,220)	(3,790)
Due to banks and financial institutions		9,078	(36,022)
Due to sister banks		-	(51,840)
Derivative financial instruments – credit		1,355	(2,613)
Customers' deposits at amortized cost		(1,117,755)	(9,385,015)
Deposits from related parties at amortized cost		(48,746)	7,404
Other liabilities		(63,793)	(51,580)
Provisions for risks and charges		106,365	(5,557)
		<u>1,652,490</u>	<u>1,625,042</u>
Cash from operations			
Taxes paid		(165,903)	(7,136)
Provisions for risks and charges paid	32	-	(138)
Retirement benefits obligation paid	32	(2,455)	(2,523)
		<u>1,484,132</u>	<u>1,615,245</u>
INVESTING ACTIVITIES			
Change in investments in subsidiaries		42,419	144,904
Cash proceeds from sale of a subsidiary		631,428	-
Financial assets at amortized cost		(28,247)	104,192
Change in fair value of financial assets at fair value through other comprehensive income		(88)	(288)
Purchase of property and equipment and intangible assets	22,23	(9,389)	(10,875)
Transfer of property and equipment and intangible assets		-	119
Proceeds from the sale of property and equipment		360	5,201
Proceeds from disposal of assets obtained in settlement of debt		15,656	18,089
		<u>652,139</u>	<u>261,342</u>
Net cash from investing activities			
FINANCING ACTIVITIES			
Debt issued and other borrowed funds		(29,697)	(342,604)
Sale of treasury shares		-	9,097
Net loss on sale of treasury shares		-	(7,926)
Lease liability payments		(668)	(1,025)
		<u>(30,365)</u>	<u>(342,458)</u>
Net cash used in financing activities			
Net foreign exchange difference in respect of cash and cash equivalents		1,504	2,251
		<u>2,107,410</u>	<u>1,536,380</u>
INCREASE IN CASH AND CASH EQUIVALENTS			
Cash and cash equivalents at 1 January		1,423,662	(112,718)
		<u>3,531,072</u>	<u>1,423,662</u>
CASH AND CASH EQUIVALENTS AT 31 DECEMBER	38		
Operational cash flows from interest and dividends			
Interest paid		392,900	1,415,988
Interest received		2,498,699	3,063,946
Dividend received		1,748	157,860

The accompanying notes 1 to 52 form part of these separate financial statements.

BLOM Bank SAL

SEPARATE STATEMENT OF CHANGES IN EQUITY

For the year ended 31 December 2021

Notes	Share capital- common shares	Share premium on common shares	Non-distributable reserves	Distributable reserves	Treasury shares	Retained earnings	Revaluation reserve of real estate	Cumulative changes in fair value (FCV)	Foreign currency translation reserve	(Loss)/ profit for the year	Total
	LL million	LL million	LL million	LL million	LL million	LL million	LL million	LL million	LL million	LL million	LL million
Balance at 1 January 2021	332,500	374,085	2,713,217	37,696	(4,434)	1,474,455	11,842	17,910	(332,245)	(14,881)	4,480,145
Loss for the year 2021	-	-	-	-	-	-	-	-	-	(27,918)	(27,918)
Other comprehensive loss	-	-	-	-	-	-	(4,062)	(4,062)	(44,220)	-	(48,282)
Total comprehensive loss	-	-	-	-	-	-	(4,062)	(4,062)	(44,220)	(27,918)	(76,300)
Transfer from non-distributable reserves to retained earnings	-	-	(36,361)	-	-	36,361	-	-	-	-	-
Appropriations of 2021 profits	-	-	7,209	-	-	(7,209)	-	-	-	14,681	-
Sale of Blom Bank Egypt SAE	-	-	(105,115)	-	-	(144,537)	-	(10,578)	260,230	-	-
Other transfers	-	-	97,243	-	-	(97,393)	-	-	-	-	58
Balance at 31 December 2021	332,500	374,085	2,676,193	37,696	(4,434)	1,346,996	11,842	3,270	(116,335)	(27,918)	4,513,895
Balance at 1 January 2020	322,500	374,385	2,637,458	37,696	(13,531)	1,445,386	11,842	10,017	(381,568)	(12,409)	4,555,768
Loss for the year 2020	-	-	-	-	-	-	-	-	-	(14,881)	(14,881)
Other comprehensive loss	-	-	-	-	-	-	-	8,049	49,321	-	57,370
Total comprehensive loss	-	-	-	-	-	-	-	8,049	49,321	(14,881)	42,489
Transfer from non-distributable reserves to retained earnings	-	-	(10,646)	-	-	10,649	-	-	-	-	-
Appropriations of 2020 profits	-	-	7,693	-	-	(7,693)	-	-	-	(25,970)	-
Transfer from (less) profit for the year to non-distributable reserves	-	-	86,451	-	-	-	-	-	-	(86,451)	-
Sale of treasury shares	-	-	(7,926)	-	9,097	-	-	-	-	-	9,097
Net loss on sale of treasury shares	-	-	-	-	-	-	-	-	-	-	(7,926)
Other adjustments	-	-	-	-	-	(57)	-	(156)	-	(70)	(283)
Balance at 31 December 2020	322,500	374,385	2,713,217	37,696	(4,434)	1,439,455	11,842	17,910	(332,245)	(14,881)	4,600,145

The accompanying notes 1 to 52 form part of these separate financial statements.

1 CORPORATE INFORMATION

BLOM Bank SAL (the "Bank"), a Lebanese joint stock company, was incorporated in 1951 and registered under No 2464 at the commercial registry of Beirut and under No 14 on the banks' list published by the Central Bank of Lebanon. The headquarters of the Bank is located in Verdun, Rashid Karameh Street, Beirut, Lebanon. The Bank's shares are listed on the Beirut Stock Exchange and Luxembourg Stock Exchange. On 23 October 2020, the Bank announced that it has applied for the withdrawal of its Global Depositary Shares from trading on the EUROMTF and the Official List of Luxembourg Stock Exchange with effect from 24 November 2020. Moreover, the GDSs and its underlying shares will continue to trade on the Beirut Stock Exchange. Noting that the Global Depositary receipt programme (GDR) will continue to operate and all GDSs will remain outstanding.

The Bank provides all banking activities (commercial, investing and private), through 77 branches in Lebanon, one branch in Cyprus, 16 branches in the Hashemite Kingdom of Jordan, and 2 branches in Iraq.

The Bank is in the process of closing its branches in Iraq following the Board of Directors decision on 15 July 2020. The Bank obtained the approval of the Central Bank of Iraq on 24 September 2020 and that of the Central Bank of Lebanon on 27 November 2020.

During 2022, the Central Bank of Lebanon asked from the Bank to close its branch in Cyprus within six months. In its meeting held on 12 April 2022, the Board of Directors decided to close its branch operations in Cyprus.

The separate financial statements were authorized for issue in accordance with the Board of Directors' resolution on 12 April 2022.

1.1 Macroeconomic environment

The Bank's operations are mostly in Lebanon that has been witnessing, since 17 October 2019, severe events that have set off an interconnected fiscal, monetary and economic crisis, as well as deep recession that have reached unprecedented levels. Sovereign credit ratings have witnessed a series of downgrades by all major rating agencies and reached the level of default when, on 7 March 2020, the Lebanese Republic announced that it will withhold payment on the bonds due on 9 March 2020, which was followed by another announcement on 23 March 2020 for the discontinuation of payments on all of its US Dollar denominated Eurobonds.

Throughout this sequence of events, the ability of the Lebanese government and the banking sector in Lebanon to borrow funds from international markets was significantly affected. Banks have imposed unofficial capital controls, restricted transfers of foreign currencies outside Lebanon, significantly reduced credit lines to companies and withdrawals of cash to private depositors, all of which added to the disruption of the country's economic activity, as the economic model of Lebanon relies mainly on imports and consumption. Businesses are downsizing, closing or going bankrupt and unemployment and poverty are rising fast and have reached unprecedented levels.

The difficulty in accessing foreign currencies led to the emergence of a parallel market to the peg whereby the price to access foreign currencies has been increasing constantly, deviating significantly from the peg of 1,507.5 US\$/LL. This has resulted in an uncontrolled rise in prices and the incessant de facto depreciation of the Lebanese Lira, impacting intensely the purchasing power of Lebanese citizens, driving a currency crisis, high inflation and rise in the consumer price index.

During 2020 in an attempt to control the high rise in prices and to compensate for the loss in the Lebanese people's purchasing power, the Central Bank of Lebanon, through several circulars introduced the following measures:

- (a) subsidized imports of essential goods (fuel oil, medicine and wheat) by providing foreign currencies for these imports at the rate of 1,507.5 US\$/LL (the official exchange rate). During 2021, this subsidy was lifted.
- (b) introduced the Platform Rate, currently at 3,900 US\$ / LL, to be used only in specific circumstances.
- (c) subsidized imports of Tier 2 food basket products (e.g. coffee, tea, canned food, imported meat) by providing foreign currencies for these imports at the Platform Rate. During 2021, this subsidy was lifted.
- (d) introduced exceptional measures for bank depositors to withdraw small amounts of cash in LL from their "local" foreign currency bank accounts at the Platform Rate, but up to limits set by the Bank.

1 CORPORATE INFORMATION (continued)

1.1 Macroeconomic environment (continued)

During May 2021, the Central Bank of Lebanon introduced the framework of exceptional measures for foreign-currency operations. Hence, banks operating in Lebanon must process customers' FX operations (buy and sell) related to their personal or commercial needs on the electronic platform "Sayrafa". Transactions with customers encompass purchase and sale of foreign currencies banknotes against LL, as well as operations from/to foreign currencies external accounts against L.L. Sayrafa corresponds to a floating system and the Sayrafa average rate and volume of foreign currency operations are published on the website of the Central Bank of Lebanon.

However, despite these efforts, inflation increased at an accelerating pace, eroding the real value of the local currency and "local" foreign currency bank accounts (subject to unofficial capital controls) and tossing Lebanon in hyperinflation and major economic collapse.

As a result of the unofficial capital controls, the multitude of exchange rates, the hyperinflation, and, the potential repercussions of government reform measures on (i) the banks operating in Lebanon, and (ii) the Lebanese people's net worth, their local businesses and their local bank accounts, the Lebanese market saw the need to differentiate between onshore assets and offshore assets, foreign currency bank accounts that are subject to unofficial capital controls and those that are not subject to capital controls, onshore liabilities and offshore liabilities. The need to differentiate is mostly due to the difference in the perceived real economic value. Hence the new terms in the Lebanese market, such as "local Dollars" to designate local US Dollars bank accounts that are subject to unofficial capital controls, and "fresh accounts" to designate foreign currency cash and foreign currency bank accounts which are free from capital controls (as they are sourced from foreign currency cash and/or from incoming transfers from abroad).

Lebanese Government's Financial Recovery Plan:

On 30 April 2020, the Council of Ministers approved the Lebanese government's Financial Recovery Plan (the Plan). The Plan relies on nine central and interrelated pillars, namely reviewing the peg policy; a comprehensive government debt restructuring; a comprehensive restructuring of the financial system addressing accumulated FX mismatches, embedded losses and resizing the banking sector (see below); a strong phased fiscal adjustment, focused on improving tax compliance, streamlining expenditure and reforming the public sector; growth-enhancing reforms promoting a productive economy and enhancing the competitiveness of the Lebanese economy; a social sector reform; an ambitious anti-corruption strategy; an environmental reform; and international financial assistance to close the large external financing gap and finance the development of the infrastructures that are necessary to support the growth of the economy. On 10 August 2020, the Lebanese government resigned following the massive explosion at the Beirut port. A new government was formed on 10 September 2021. However, to date, the Plan has not been implemented.

Restructuring of the Banking Sector:

As per the Plan, the preliminary global estimation of losses will result from the restructuring of the Central Bank of Lebanon and impairment of assets held at the Central Bank of Lebanon; the impact of the economic crisis and the impairment of banks' loans portfolio; and the government debt restructuring and impairment of the government securities portfolio.

An Asset Quality Review will be conducted to assess the impairment losses on the private loans portfolio of the banking sector. The impact of losses and the recapitalisation needs will be determined on a bank by bank basis when a more granular plan is drawn, and further measures related to bank deposits will be determined. On a bank by bank basis, the Plan stipulates that large depositors could be offered voluntarily (for part of their deposits):

- Conversion into their bank's capital. New legal provisions will be needed.
- Conversion into tradable equity stakes in a newly established special Recovery Fund that will receive the proceeds of the ill-gotten assets tracking and recovery program.
- Conversion into long dated, subordinated bank obligations with no or limited interest.

Banks will be asked to propose to authorities and relevant supervisory bodies business plans and restructuring/recapitalisation plans including mergers with or acquisitions by other domestic and foreign banks to address their structural funding issues and generate synergies. The new capital base will be rebuilt via capital raising in the market and a conversion of some deposits into shares. Fresh liquidity will be provided to the reorganised banking sector. Conducting a full restructuring of the banking sector will require new legal powers for the government and the relevant supervisory bodies.

I CORPORATE INFORMATION (continued)

1.1 Macroeconomic environment (continued)

Alternative Plan submitted by the Association of Banks in Lebanon

The Association of Banks in Lebanon (ABL) has released its alternative plan for economic and financial recovery in Lebanon.

ABL's Contribution to the Government's Financial Recovery Plan rests on an IMF-supported two-pillar approach with a clearly phased and timely implementation: (i) An immediate balanced and effective immediate response addressing the external financing needs and putting the medium-term fiscal and debt path on a sustainable footing, while avoiding an internal debt default that would have damaging consequences on the Lebanese people and on confidence; (ii) The launch of long-overdue structural reforms in the coming months, to promote sustainable and inclusive growth as the result of economic diversification. The ABL plan envisages a settlement mechanism that would include several features for capitalization and settlement of government debt to BDL.

The ABL approach deploys five strategic priorities allowing a prompt and sustainable economic and financial recovery in the wake of expected IMF (or the "Fund") Balance of Payments ("BoP") support requested by the government on May 1st:

- I. A debt restructuring process that minimizes the damaging consequences to the nearly 3 million domestic bank depositors and to the economy as a whole, while priming the economy for a faster recovery and higher medium-term potential growth
- II. A sustainable medium-term fiscal strategy leaving a significant fiscal space to finance much-needed social measures, including an Expanded Social Safety Net to fight poverty and concrete steps against social exclusion
- III. A monetary and exchange rate unification policy that addresses the massive external imbalances while containing considerable inflationary pressures and avoiding hyperinflation
- IV. A financial sector restructuring based on an orderly banking sector approach on a case-by-case basis when needed, upgrading regulatory matters to international standards
- V. A strong diversification strategy of the economy as well as much-needed structural reforms including anticorruption measures, a lower cost of Doing Business in the country as well as reforms that reduce the size of the informal sector

International Monetary Fund (IMF) response

Following the end of the IMF virtual mission conducted from 24 January to 11 February with the Lebanese authorities on the framework and policies of an economic reform program that can be supported by the Fund, the IMF issued a release on Lebanon, saying that the unprecedented and complex nature of the Lebanese crisis requires a comprehensive economic and financial reform program to stabilise the economy, address deep-seated challenges, and lay the ground for sustainable and strong growth. Obtaining broad based buy-in for this multi-year program will be fundamental for its timely and decisive implementation. At the same time, strong upfront actions will be necessary to start turning the economy around and rebuilding confidence.

According to the IMF, Lebanon's economic program would need to include targeted and time bound actions across the following five pillars:

- Fiscal reforms that ensure debt sustainability but also space to invest in social spending and reconstruction efforts.
- Restructuring of the financial sector to strengthen confidence and support the recovery.
- Reforming state-owned enterprises, and, particularly, the energy sector to provide better services without draining public resources.
- Strengthening governance, anti-corruption, and AML/CFT frameworks to enhance transparency and accountability.
- A credible monetary and exchange rate system.

During the mission, progress was made in agreeing on these necessary reform areas, although more work is needed to translate them into concrete policies as per the IMF release. There is a clearer understanding of the unprecedented size of the financial sector's losses that would need to be addressed transparently consistent with the hierarchy of claims while protecting small depositors, as already envisaged by the authorities. The 2022 emergency budget presents an opportunity to start addressing the dire fiscal situation while being mindful of the financing constraints.

1 CORPORATE INFORMATION (continued)

1.1 Macroeconomic environment (continued)

International Monetary Fund (IMF) response (continued)

The Fund stated that it will be important to develop a medium-term fiscal strategy that allows the government to invest in critically-needed social spending to support the people of Lebanon — and enables reconstruction efforts — while being consistent with debt sustainability. The authorities' plans to strengthen competition and start addressing the energy sector problems are a promising start, although careful sequencing and strong implementation are required. Finally, decisive action by the authorities is needed to tackle the deep-seated problem of corruption and strengthening transparency, including by accelerating the launch of the procurement commission and lifting the bank secrecy law or amending it in line with international best practice. The IMF team welcomed the open and constructive discussions with the Lebanese authorities, as well as representatives of civil society and the private sector, which have enriched our understanding of the situation. The team will remain closely engaged, and discussions are continuing, to help the authorities formulate a reform program that can address Lebanon's economic and financial challenges.

Beirut Port Explosion

On 4 August 2020, a large explosion occurred at the port of the city of Beirut, causing casualties and material damages across the capital of Lebanon. The Beirut Port explosion affected several individuals and businesses and contributed to further deterioration of the economic environment and disruption of businesses, leading to further expected credit losses charges. The World Bank estimated the direct and indirect damages to the Lebanese economy as a result of the Beirut Port explosion at approximately US\$ 8 billion.

COVID-19

The COVID-19 pandemic has had, and continues to have, a material impact on businesses around the world and the economic environments in which they operate. It has caused disruption to businesses and economic activities and increased the level of uncertainty in domestic and international markets. Regulators and governments across the globe have introduced schemes to provide financial support to parts of the economy most impacted by the COVID-19 pandemic.

In the case of the Bank, similar to many entities for which the operating environment is mostly in Lebanon, the impact of COVID-19 cannot be isolated and assessed independently from the economic crisis that the country is witnessing. COVID-19 is adding up to the severity of the economic downturn from a commercial, regulatory and risk perspective.

Future impairment charges, already subject to high uncertainty and volatility due to the severe crisis in Lebanon, may be subject to further uncertainty and volatility as a result of the COVID-19 pandemic and related containment and lock down measures. More adverse economic scenarios and macro-economic variables, with higher probabilities are considered for expected credit losses financial impact.

It remains unclear how this will evolve, and the Bank continues to monitor the situation closely. Any and all such events mentioned above will add up to the already material adverse prospects on the Bank's business, financial condition, results of operations, prospects, liquidity and capital position.

1.2 Regulatory environment

During 2020 and up to the date of the authorization of issue of these separate financial statements, the Central Bank of Lebanon has issued several circulars to address the situations, mainly:

- Basic Circular 150 issued on 9 April 2020 and exempting banks from placing mandatory reserves with the Central Bank of Lebanon in relation to funds transferred from abroad or cash deposits in foreign currency received after 9 April 2020, subject to preserving and guaranteeing the liberty of the depositors in determining the use of these funds and benefiting from all kinds of banking services (transfers abroad, international credit card limits, foreign currency cash withdrawals...).

1 CORPORATE INFORMATION (continued)

1.2 Regulatory environment (continued)

- Basic Circular 151 issued on 21 April 2020 and concerning depositors who wish to withdraw amounts of cash from their foreign currencies accounts as per the Platform Rate up to limits set by the Bank. The resulting foreign currencies should be sold to the Central Bank of Lebanon. The exchange rate specified by the Central Bank of Lebanon in its transactions with banks will remain applicable to all other operations in US Dollars.
- Intermediate Circular 552 issued on 22 April 2020 and requesting banks to grant loans against the settlement of facilities and instalments due during the months of March, April, May and June for clients who are not able to pay their dues due to the current economic situation, as assessed by the Bank. The new loans are to be granted up to 5 years starting 30 June 2020 and on condition, among others, that these are granted to repay the above months settlements or, if the client is an establishment or corporation, to pay the staff or the production and operational fees, with no commissions or fees and zero interest rate. The Central Bank of Lebanon will grant the banks loans with zero interest rate against the said loans.
- Intermediate Circular 567 issued on 26 August 2020, which partly altered the directives for the determination of expected credit losses and regulatory capital calculation and ratios, previously set in its Intermediate Circular 543 issued on 3 February 2020. Loss rate applied for the calculation of regulatory expected credit losses on exposures to Lebanese sovereign bonds in foreign currencies was increased from 9.45% to 45%, while loss rates applied for the calculation of regulatory expected credit losses on exposures to Lebanese sovereign bonds in local currency, exposures to the Central Bank of Lebanon in foreign currencies and exposures to the Central Bank of Lebanon in local currency remained the same (0%, 1.89% and 0% respectively). The circular however changed the requirement for the recognition of expected credit losses in banks' financial statements from applying at a "maximum" the loss rate adopted for regulatory expected credit losses calculations, to applying it at a "minimum". In addition, the circular introduced the following measures:
 - Allowing banks to constitute the expected credit losses on exposures to Lebanese sovereign and the Central Bank of Lebanon, progressively over a period of five years, noting that the Central Bank of Lebanon's Central Council may accept to extend the term to 10 years for banks that manage to complete the 20% cash contribution to capital requirement.
 - Allowing banks not to automatically downgrade loan classification or staging for borrowers that were negatively affected by the COVID-19 pandemic, showing past due and unpaid for the period from 1 February 2020 to 31 December 2020. These borrowers must be identified as either still operating on a going concern basis or not. In case the borrower is still operating as a going concern, the Bank may reschedule the loan. In exceptional cases when the borrower ceases to operate as a going concern following the impact of the COVID-19 pandemic, the Bank must immediately downgrade the loan classification and staging to Stage 3 (default).
 - Requesting from banks to finalise the assessment of the future financial position of their customers by 31 December 2020, and to estimate expected credit losses based on this assessment and recognise the financial impact in the statement of income for the year ended 31 December 2020.
 - Prohibiting banks from distributing dividends on common shares for the years 2019 and 2020.
 - Requesting from banks to increase their own funds (equity) by an amount equal to 20% of their common equity Tier 1 capital as of 31 December 2018, through issuing new foreign currency capital instruments that meet the criteria for inclusion as regulatory capital, except retained earnings and gain from revaluation of fixed assets. The Central Bank of Lebanon's Central Council may exceptionally approve for a bank to complete 50% of the 20% required capital increase through the transfer of real estate properties from the shareholders to the concerned bank. However, these real estate properties must be liquidated in a period of 5 years following the operation.
 - Changing the treatment of revaluation of fixed assets reserve for regulatory capital calculation, to become allowed for inclusion as Common Equity Tier 1 (previously 50% of this reserve was allowed for inclusion as Tier 2), subject to approval of the Central Bank of Lebanon on the revaluation gain.

1 CORPORATE INFORMATION (continued)

1.2 Regulatory environment (continued)

- Banks must comply with the minimum capital adequacy ratios and are forbidden from distributing profits if these ratios drop below 7% for common equity Tier 1, 10% for Tier 1 and 12% for total capital. Banks must maintain a capital conservation buffer of 2.5%, comprised of Common Equity Tier 1. When the buffer is drawn down, banks are required to rebuild it. However, under exceptional circumstances, the buffer may be drawn down during 2020 and 2021, but must be rebuilt progressively starting 2022, by at least 0.75% each year, to reach the minimum required of 2.5% by end of 2024.
- Preparing and presenting to the Central Bank of Lebanon a comprehensive plan for rectifying non-compliances with regulatory capital requirements and other regulations imposed by the Central Bank of Lebanon, taking into consideration all required provisions by the Banking Control Commission of Lebanon (BCCL), as well as other losses or provisions that the Bank expects to incur from all kinds of exposures to risks, and specifying the period of time needed to address the non-compliances.
- Exceptionally for the years 2020 and 2021, Allowances for Expected Credit Losses on Stage 1 and 2 exposures, excluding those relating to Lebanese sovereign and the Central Bank of Lebanon, may be included under regulatory Common Equity Tier 1. This treatment will be amortised over a period of 3 years (2022-2024 by 25% yearly).
- Basic Circular 154 issued on 27 August 2020 and aiming mainly at restoring the operations of banks in Lebanon to their normal levels as at before October 2019, and rectifying any non-compliance with regulatory ratios and banking regulations. The circular mainly introduced the following measures:
 - Requesting banks to present a fair assessment of the value of their assets and liabilities for the purpose of putting in place the comprehensive plan referred to in Intermediate Circular 567 (refer to above), in order to be able, within a period limited in time, to comply with the regulatory and banking requirements, mainly those related to liquidity and solvency, and in order to restore the operations of the Bank to their normal levels as at before October 2019.
 - Requesting banks to incite each customer who has transferred abroad, between 1 July 2017 and the date of the circular, more than US\$ 500,000 or their equivalent in other foreign currencies, to deposit in a 5-year term "special account" an amount equal to 15% to 30% (depending on the type of customer) of the transferred amount. Banks shall use this type of deposits to facilitate foreign operations that stimulate the national economy. This is also applicable for the banks' importing customers, based on opened letters of credits during any of the years 2017, 2018 and 2019, and without a minimum threshold.
 - Requesting from banks to maintain a current account with a foreign correspondent bank offshore, free of any obligations (liquidity abroad). Such account shall be at no time less than 3% of the Bank's total foreign currency deposits as at 31 July 2020, by 28 February 2021.
 - Requesting from banks, after taking consideration of their fair assessment of their financial position, to present a plan during the first quarter of 2021, to address recapitalisation needs, if any, to the Central Bank of Lebanon's Central Council, for its approval. Banks shall take the necessary legal and regulatory measures in order to facilitate the consensual possibility for their depositors to transfer their deposits to shares or bonds. Bank shares will be exclusively listed in Beirut. Banks can pay interest on the bonds that exceed current levels.
- Intermediate Circular 568 issued on 26 August 2020 and allowing the payments of retail loans denominated in US Dollars in Lebanese Liras based on the official exchange rate of LL 1,507.5 per US Dollar subject to the following conditions:
 - The client should be a Lebanese resident.
 - The client should not have a bank account denominated in US Dollars.
 - The housing loans granted to the client should not exceed US\$ 800,000 while the aggregate amount of retail loans should not exceed US\$ 100,000 per client.

1 CORPORATE INFORMATION (continued)

1.2 Regulatory environment (continued)

- Intermediate Circular 575 issued on 5 November 2020 states that banks should book one third of the capital gains arising from the revaluation of fixed assets held in settlement of debt under Tier 2 capital based on the following binding conditions:
 - The Central Bank of Lebanon's Central Council investigating and approving at the expense of the concerned bank the validity of the revaluation process.
 - Raising the capital before 31 December 2021, as follows:
 - Add a maximum of one third of the revaluation gains under Tier 2 capital.
 - Increase Common Equity Tier 1 capital in cash by an amount at least equivalent to the amount of the revaluation gains booked under Tier 2 capital.
- Basic Circular 157 issued on 10 May 2021 and setting the framework of exceptional measures for foreign-currency operations. Hence, banks operating in Lebanon must process customers' FX operations (buy and sell) related to their personal or commercial needs on the electronic platform "Sayrafa". Transactions with customers encompass purchase and sale of foreign currencies banknotes against LL, as well as operations from/to foreign currencies external accounts against LL. Banks are required to properly document each transaction and should not collect commission margins between buy and sell operations exceeding 1%.
- Basic Circular 158 issued on 8 June 2021 and defining the mechanism for the gradual settlement of foreign currency deposits up to an amount equivalent to US\$ 50,000. To benefit from the provisions of the said circular, certain eligibility criteria must be met.

Eligible funds will be transferred to a subaccount over which banking secrecy will be lifted vis-à-vis BdL and BCC before being gradually withdrawn and remitted to the customer on a monthly basis. Customers' monthly entitlements are (i) an amount of US\$ 400 in cash or equivalent (transfer abroad, credited to a payment card with international usage, etc.) and (ii) an amount in LL equivalent to US\$ 400 and converted at a rate US\$/LL 12,000, noting that 50% of the amount will be paid in cash and 50% will be credited to a payment card.

The financing of the aforementioned process will be secured equally through (i) BdL reduction of compulsory reserves requirements from 15% to 14% as per BDL Intermediary Circular 586 and (ii) the Bank's offshore liquidity. To that end, the Bank can use its foreign liquidity subject computed as per BdL Basic Circular 154 requirements on the condition it reconstitutes it by 31 December 2022.
- Basic Circular 159 issued on 17 August 2021 preventing banks from processing foreign currency funds received from customers whether in the form of cash or through offshore transfers at a value other than its face value, with the exception of transactions pertaining to the settlement of loans. It also prevented banks from purchasing foreign currencies at parallel rate with the exception of the purchase foreign currencies duly recorded on the electronic platform and resulting from offshore incoming transfers with the purpose of (i) enhancing liquidity, (ii) engaging in medium or long term investments, (iii) settling international commitments. Finally the circular prevented banks from purchasing bankers' checks and other bank's accounts in foreign currencies whether directly or indirectly.
- Intermediate Circular 600 issued on 3 November 2021 requires banks to record existing and future provisions for expected credit losses in the same currency as the related assets and off-balance sheet exposures. Banks are also required to set in place necessary measures to manage their FX position resulting from provisions recorded in foreign currencies.
- Intermediate Circular 601 issued on 8 December 2021 is an amendment to the provisions of Basic Circular 151. The circular stipulates that the Platform Rate to be applied for withdrawal cash from foreign currencies accounts is LL 8,000 US\$/LL up to a maximum limit of US\$ 3,000 per month.
- Basic Circular 161 issued on 16 December 2021 whereby the Central Bank of Lebanon will be providing banks with US Dollar up to the limits set for each bank, at the Sayrafa rate. In return, banks will provide the total amount to their customers at the same Sayrafa rate against LL at limits set by the bank until 30 April 2022.

1 CORPORATE INFORMATION (continued)

1.2 Regulatory environment (continued)

- Intermediate Circular 614 issued on 21 February 2022 allowing non-banking institutions engaged in overseas cash transfers by electronic means to apply for a license from the Central Bank of Lebanon to perform foreign exchange operations subject to certain conditions.
- Intermediate Circular 616 issued on 5 March 2022 prohibiting banks from distributing dividends to ordinary shareholders from the results of financial years 2019, 2020 and 2021.

1.3 Particular situation of the Bank

Assets and liabilities in foreign currency, transactions in foreign currency and foreign currency translation reserves, regardless of whether they are onshore or offshore, were reflected in these separate financial statements at the official published exchange rate as follows:

	2021		2020	
	Rate as at 31 December LL	Average rate for the year ended 31 December LL	Rate as at 31 December LL	Average rate for the year ended 31 December LL
US Dollar	1,507.5	1,507.5	1,507.5	1,507.5
Euro	1,701.52	1,783.97	1,851.21	1,720.19
Swiss Franc	1,647.00	1,649.62	1,713.77	1,607.13
Jordanian Dinar	2,126.23	2,126.23	2,126.23	2,126.23
Egyptian Pound	95.88	96.03	95.78	95.32
Saudi Riyal	401.53	401.91	401.79	401.71
British Pound	2,024.94	2,074.72	2,059.12	1,934.44
Romanian Leu	343.87	362.54	380.17	355.55
Arab Emirates Dirham	409.02	410.57	410.73	410.34
Iraqi Dinar	1.03	1.03	1.03	1.03

The exchange rates above consist of the official exchange rates published by the Central Bank of Lebanon on a monthly basis. However, several exchange rates have emerged since the last quarter of 2019 that vary significantly among each other and from the official one: parallel exchange markets and the Sayrafa rate that are highly volatile, the Platform Rate, estimated exchange rates detailed in the government's Financial Recovery Plan, in addition to different exchange rates adopted for commercial transactions purposes in Lebanon.

- On 21 April 2020 the Central Bank of Lebanon issued Basic Circular 151 concerning depositors who wish to withdraw amounts of cash from their "local" foreign currencies accounts as per the Platform Rate up to limits set by their bank. The limits set by the banks in Lebanon had monthly averages of US\$ 3,000 per bank account. The "Platform Rate" was 1 US\$ / LL 3,900 throughout the period from the issuance of the circular. During December 2021, it was increased to 1 US\$ / LL 8,000.
- On 10 May 2021, the Central Bank of Lebanon issued Basic Circular 157 setting the framework of exceptional measures for foreign-currency operations. Hence, banks operating in Lebanon must process customers' FX operations (buy and sell) related to their personal or commercial needs on the electronic platform "Sayrafa". Transactions with customers encompass purchase and sale of foreign currencies banknotes against LL, as well as operations from/to foreign currencies external accounts against LL. The Sayrafa corresponds to a floating system and the Sayrafa average rate and volume of foreign currency operations are published on the website of the Central Bank of Lebanon. Foreign currency operations were executed on the Sayrafa platform at the following exchange rates:

1 CORPORATE INFORMATION (continued)

1.3 Particular situation of the Bank (continued)

	2021		2020	
	Rate as at 30 June LL	Average rate for the period from 10 May to 31 December LL	Rate as at 31 December LL	Average rate for the year ended 31 December LL
US Dollar	22,700	16,266	N/A	N/A

The Sayrafa platform is not available for the purchase and sale of and “local” foreign currency bank accounts which are subject to unofficial capital controls.

- On 8 June 2021, the Central Bank of Lebanon issued Basic Circular 158 defining the mechanism for the gradual settlement of foreign currency deposits up to an amount equivalent to US\$ 50,000. To benefit from the provisions of the said circular, certain eligibility criteria must be met. Customers’ monthly entitlements are (i) an amount of US\$ 400 in cash or equivalent (transfer abroad, credited to a payment card with international usage, etc.) and (ii) an amount in LL equivalent to US\$ 400 and converted at a rate US\$/LL 12,000, noting that 50% of the amount will be paid in cash and 50% will be credited to a payment card.

Because of the gap between the several exchange rates available, the number of variables and assumptions affecting the possible future resolution of the uncertainties is very high, increasing the subjectivity and complexity of the judgment, and Management was unable to determine the rate at which the future cash flows represented by the transaction or balance could have been settled depending on its source and nature, if those cash flows had occurred at the measurement date. Accordingly, the Bank uses the official published exchange rate above to translate all balances and transactions in foreign currencies regardless of their source or nature, which does not represent a reasonable estimate of expected cash flows in Lebanese Liras that would have to be generated/used from the realisation of such assets or the payment of such liabilities at the date of the transaction or at the date of the separate financial statements. We are unable to estimate the effects on these separate financial statements and these separate financial statements do not include adjustments from any future change in the official published exchange rate. The impact of the valuation of the assets and liabilities in foreign currencies at a different rate is expected to be significant and will be recognised in these separate financial statements once the revamping of the peg is implemented by the Lebanese government. Foreign currency mismatch is detailed in note 46A to these separate financial statements.

As at 31 December 2021, loss allowances on assets held at the Central Bank of Lebanon and the portfolio of Lebanese government securities held at amortised cost are recorded in these separate financial statements at the loss rates mentioned in the Central Bank of Lebanon’s Intermediate Circular 567. Due to the high levels of uncertainties, the lack of observable indicators, and the lack of visibility on the government’s plans with respect to the bank’s exposures to the Central Bank of Lebanon and Lebanese sovereign, we are unable to estimate in a reasonable manner expected credit losses on these exposures. Accordingly, these separate financial statements do not include adjustments of the carrying amount of these assets to their recoverable amounts based on International Financial Reporting Standards and an expected credit loss model.

The impact is expected to be pervasive and will be reflected in the separate financial statements once the debt restructuring has been defined conclusively by the government and all uncertainties and constraints are resolved and the mechanism for allocating losses by asset class and currency is clear and conclusive. Maximum exposures to the credit risk of the Central Bank of Lebanon and the Lebanese government and the recognised loss allowances, as well as their staging are detailed in note 45 to the separate financial statements.

As a result of the negative economic conditions and the deepening of the recession, the credit quality of the private loans portfolio concentrated in Lebanon has significantly deteriorated since the last quarter of 2019. The deterioration was further aggravated by the effects of the COVID-19 pandemic and the significant high inflation in Lebanon. Since the start of the Lebanese crisis, the Bank has been implementing a de-risking strategy by considerably reducing its assets size, specifically its portfolio of private loans concentrated in Lebanon. It has also set up a centralised and specialised remedial function to proactively review and manage the quality of its various portfolios.

1 CORPORATE INFORMATION (continued)

1.3 Particular situation of the Bank (continued)

The Bank has recorded significant amounts of expected credit losses during the last quarter of 2019 and during 2020. Loss allowances on the Bank's portfolio of these private loans have been estimated based on the best available information at the reporting date about past events, current conditions and forecasts of economic conditions combined with expert judgement. Maximum exposures to the credit risk of the Bank's portfolio of private loans and the recognised loss allowances, as well as their staging, are detailed in note 45 to these separate financial statements.

The financial position of the Bank, as reported in these separate financial statements, does not reflect the adjustments that would be required by IFRS as a result of the future government reform program, the deep recession, the currency crisis and the hyperinflation. Due to the high levels of uncertainties, the lack of observable indicators, the high gap between the parallel market rates, the Sayrafa rate, the Platform Rate and the official published exchange rate and the lack of visibility on the government's plans with respect to: (a) the high exposures of banks with the Central Bank of Lebanon, (b) the Lebanese sovereign securities, and (c) the currency exchange mechanisms and currency exchange rates that will be applied, Management is unable to estimate in a reasonable manner the impact of these matters on its financial position.

Management anticipates that the above matters will have a materially adverse impact on the Bank's separate financial position and its equity.

Litigations and claims

Until the above uncertainties are resolved, the Bank is continuing its operations as performed since 17 October 2019 and in accordance with the laws and regulations. Unofficial capital controls and inability to transfer foreign currencies to correspondent banks outside Lebanon are exposing the Bank to litigations that are dealt with on a case by case basis when they occur. The Bank has been subject to increased litigations as a result of these restrictive measures adopted by Lebanese banks in relation to withdrawal of funds and transfers abroad, as well as in relation to the repayment by customers of local foreign currency loans in Lebanese Liras. Management is carefully considering the impact of these existing litigations and claims. There are still uncertainties related to the consequences of these restrictive measures based on the current available information and the prevailing laws and local banking practices. Management considers that the said claims seem unlikely to have a material adverse impact on the financial position and capital adequacy of the Bank, however due to recent development and the increasing trend in judgments ruled in favour of the plaintiffs during 2021, management considers that they may affect negatively the offshore liquidity of the Bank, its foreign assets and its foreign currency mismatch (refer to note 46A). The amount cannot be determined presently.

Meanwhile, the Bank is exerting extended efforts to (a) strengthen its capitalisation, (b) enhance the quality of its private loans portfolio, deleveraging it as appropriate and downsizing its balance sheet, (c) build up its offshore liquidity and reduce its commitments and contingencies to correspondent banks and financial institutions outside Lebanon and (d) manage operating profitability. Once the above uncertainties are resolved, a pro-forma balance sheet of the Bank will be prepared which will include the effects of the revaluation of the assets and liabilities in foreign currencies, the effects of the hyperinflation, the effects of the restructuring of the government debt securities, the effects of the restructuring of the Central Bank of Lebanon balance sheet and the effects on its private loan portfolio.

On 1 October 2020, the Bank received a letter from the Central Bank of Lebanon, referring to Basic Circular 154 and Intermediate Circular 567, and requesting the Bank to submit, a roadmap that sets out the following:

- The Bank's overall strategy for the years 2020 – 2024
- The Bank's assessment of its portfolio of private loans and expected credit losses as at 31 December 2020, as well as total realised and expected losses for the year 2020.
- The amount of expected credit losses that have not been translated yet to foreign currencies.
- The capital needs to comply with the minimum required capital and the measures and sources that will be relied upon to cover the shortfall, when existing.
- The Bank's strategy with respect to its investments in foreign banks and branches.
- The mechanism to rectify any non-compliance with regulatory requirements.
- The measures that will be taken to rectify non-compliances with articles 154 and 153 of the Code of Money and Credit, if any.
- The measures that will be taken to attract foreign liquidity or "fresh funds" and to cover liquidity onshore and offshore commitments

1 CORPORATE INFORMATION (continued)

1.3 Particular situation of the Bank (continued)

The roadmap was submitted to the Central Bank of Lebanon on 4 December 2020 including a number of assumptions that remain highly susceptible to material change depending on the evolution of the financial, monetary and operating conditions in Lebanon. However, a reasonable and credible roadmap can only be achieved once the many material uncertainties still governing the outlook in Lebanon are resolved and the amount of recapitalisation needs is accurately determinable.

The Bank's key strategic objectives during this challenging period focused on the consolidation and de-risking of the domestic franchise and operations, and the ring-fencing of foreign entities and branches from Lebanon spill-over effects: 1- Strengthening the Bank's foreign currency liquidity metrics; 2- Maintaining sufficient capital buffers over the minimum regulatory capital adequacy levels; 3- Improving asset quality by (i) closely monitoring the lending portfolios, taking early remedial actions on problematic files and maintaining adequate provisioning coverage and (ii) significantly reducing sovereign debt exposure, especially in foreign currency; 4-Ensuring that foreign entities continue to provide the Group with diversified income generation capacity; 5-Targeting a lean organizational structure by improving operational efficiency and optimizing cost structure.

Management has been focusing on six main pillars to face the current financial and economic environment. These pillars are: 1-Asset Quality; 2-Quality of Earnings; 3-Liquidity and ALM; 4-Solvency; 5-Operational and other Non-financial Risks and 6- Governance. The roadmap details the key actions related to each specific pillar.

The Bank has so far implemented a series of measures in relation to these key strategic objectives and pillars, including:

- Distribution of exceptional dividends in the first quarter of 2020 from BANQUE BANORIENT France SA to BLOM Bank Lebanon for the value of EUR 94.5 million (equivalent to LL 157,328 million);
- Revaluation of foreign subsidiaries by performing a voluntary change in accounting policy to measure the Bank's subsidiaries using the equity method instead of the cost method and which should have a cumulative positive impact on the Bank's Tier 1 capital as at 31 December 2021 and 2020; and
- Sale of Blom Bank Egypt SAE during 2021.

On 7 May 2021, the Bank obtained the Central Bank of Lebanon approval on the above three points.

All of these measures have helped to strengthen the Bank's financial position, including international liquidity and solvency metrics. As at December 2021, consolidated capital adequacy ratios stood at 12.5%, 12.5% and 12.54% for CET1, Tier 1 and Total CAR respectively, above the minimum required levels of 4.5%, 6% and 8% for 2020-2021 and 7%, 8.5% and 10.5% (including 2.5% capital conservation buffer) required by 2024.

The Bank has also prepared financial projections covering future years until 2024, taking into account various additional planned actions, including:

- Strengthening its financial condition by using all of its future consolidated profits for that purpose.
- Continuing to deleverage of its loan portfolio booked in Lebanon during 2021.
- Increasing significantly its international foreign currency liquidity position.

The Bank is unable to predict the response of the Central Bank of Lebanon on its submitted roadmap, as well as the level of its adherence with the banking regulations and its planned actions, nor it is able to predict the measures that might be taken by the regulator in that regard. Once the Bank receives an official feedback from the Central Bank of Lebanon, Management will therefore be able to assess its impact on the separate financial statements of the Bank.

The Bank is also uncertain whether the measures set out in its roadmap above would be sufficient to cover all its commitments as they become due and restore the activities of the Bank to normal pre-crisis levels. Such sufficiency and a reasonable and credible plan can only be achieved once the uncertainties from the prevailing crisis, the multitude of exchange rates, hyperinflation, the COVID-19 pandemic, the explosion of the Beirut port, as well as the implementation of a clear national fiscal and economic recovery plan are resolved.

1 CORPORATE INFORMATION (continued)

1.3 Particular situation of the Bank (continued)

The Lebanese crisis which was set off during the last quarter of 2019, has imposed severe limitations on the ability to conduct commercial banking activities or transactions under the normal course of business in Lebanon. Market embedded factors, such as unofficial capital controls, inability to secure foreign liquidity and the existence of several values for the US Dollar, resulted into several practices and transactions that would not qualify as normal course of business in a non-crisis environment, and for which there are no directly observable prices or a governing legal/regulatory framework.

Such practices and transactions expose the Bank to increased litigation and regulatory risks and negatively impact the financial position of the Bank, its regulatory ratios and covenants due the adverse effects of the uncertainties. There is a significant uncertainty in relation to the extent and period over which this situation will continue and the impact that conducting operations under a crisis environment in the foreseeable future will further have on the Bank's financial position, future cash flows, results of operations, regulatory ratios and covenants. The Bank's realization value of assets and sufficiency and settlement value of liabilities are premised on future events, the outcome of which are inherently uncertain.

2 ACCOUNTING POLICIES

2.1 Basis of preparation

The separate financial statements have been prepared on a historical cost basis except for: a) the restatement of certain tangible real estate properties in Lebanon according to the provisions of law No 282 dated 30 December 1993, b) the measurement at fair value of derivative financial instruments, financial assets at fair value through profit or loss, and financial assets at fair value through other comprehensive income and c) the measurement of investments in subsidiaries using the equity method.

The separate financial statements are presented in Lebanese Lira (LL), which is the Bank's functional currency, and all values are rounded to the nearest LL million, except when otherwise indicated.

These separate financial statements incorporate the results of operations, assets and liabilities of the Head Office and Lebanese and foreign branches only, without consolidating the operating results and financial position of the subsidiaries. Consolidated financial statements as of 31 December 2021 are also presented by the Bank, and are available at the Bank's offices.

As of 31 December 2021 and 2020, all conditions have been met for the Bank's separate financial statements to incorporate the inflation adjustment provided under IAS 29 "Financial Reporting in Hyperinflationary Economies". IFRS requires that financial statements of any entity whose functional currency is the currency of a hyperinflationary economy be restated into the current purchasing power at the end of the reporting period. Paragraph 4 of IAS 29 states that it is preferable for all entities that report in the currency of a hyperinflationary economy to apply the standard at the same date. In order to achieve uniformity as to the identification of an economic environment of this kind, IAS 29 provides certain guidelines: a cumulative three-year inflation rate exceeding 100% is a strong indicator of hyperinflation, but also qualitative factors, such as analysing the behaviour of population, prices, interest rates and wages should also be considered.

The Lebanese national statistics office reported 3-year and 12-month cumulative rates of inflation of 753% and 224%, respectively, as of December 2021 (2020: 173% and 146%). Qualitative indicators, following the deteriorating economic condition and currency controls, also support the conclusion that Lebanon is a hyperinflationary economy for accounting purposes for periods ending on or after 31 December 2021.

Therefore, entities whose functional currency is the Lebanese Lira should restate their financial statements to reflect the effects of inflation in conformity with IAS 29. Such restatement shall be made as if the Lebanese economy has always been hyperinflationary; using a general price index that reflects the changes in the currency's purchasing power.

2 ACCOUNTING POLICIES (continued)

2.1 Basis of preparation (continued)

The effects of the application of IAS 29 are summarised below:

- (a) Financial statements must be adjusted to consider the changes in the currency's general purchasing power, so that they are expressed in the current unit of measure at the end of the reporting period.
- (b) In summary, the restatement method under IAS 29 is as follows:
 - i) Monetary items are not restated in as much as they are already expressed in terms of the measuring unit current at the closing date of the reporting period. In an inflationary period, keeping monetary assets generates loss of purchasing power and keeping monetary liabilities generates an increase in purchasing power. The net monetary gain or loss shall be included as income for the period for which it is reported.
 - ii) Non-monetary items carried at the current value of the end date of the reporting period shall not be restated to be presented in the balance sheet, but the restatement process must be completed in order to determine into the current purchasing power at the end of the reporting period the income derived from such non-monetary items.
 - iii) Non-monetary items carried at historical cost or at the current value of a date prior to the end of the reporting period are restated using coefficients that reflect the variation recorded in the general level of prices from the date of acquisition or revaluation to the closing date of the reporting period, then comparing the restated amounts of such assets with the relevant recoverable values. Depreciation charges of property, plant and equipment and amortisation charges of intangible assets recognised in profit or loss for the period, as well as any other consumption of non-monetary assets will be determined based on the new restated amounts.
 - iv) Income and expenses are restated from the date when they were recorded, except for those profit or loss items that reflect or include in their determination the consumption of assets carried at the purchasing power of the currency as of a date prior to the recording of the consumption, which are restated based on the date when the asset to which the item is related originated; and except those profit or loss items originated from comparing two measurements expressed in the purchasing power of currency as of different dates, for which it is necessary to identify the compared amounts, restate them separately, and compare them again, but with the restated amounts.
 - v) At the beginning of the first year of application of the restatement method of financial statements in terms of the current measuring unit, the prior-year comparatives are restated in terms of the measuring unit current at the end of the current reporting period. The equity components, except for reserved earnings and undistributed retained earnings, shall also be restated, and the amount of undistributed retained earnings shall be determined by the difference between net assets restated at the date of transition and the other components of opening equity expressed as indicated above, once all remaining equity components are restated.

As of the date of the accompanying separate financial statements, for the reasons described below, Management is temporarily unable to apply the above mentioned standard nor is it able to quantify the effect that the application of IAS 29 would have on the presented separate financial statements. However, management estimates such effects to be significant. This situation must be taken into account when interpreting the information reported by the Bank in the accompanying separate financial statements including its separate statement of financial position, separate income statement, separate statement of comprehensive income and separate cash flow statement.

The Bank uses the official published exchange rate of 1,507.5 US\$/LL to translate balance and transactions in foreign currencies. Since the emergence of the parallel market and since the introduction by the Central Bank of Lebanon of the "Sayrafa Rate" and "Platform Rate", the Lebanese market has witnessed multiple pricing and valuations of balances receivable and payable and operations in foreign currencies, depending on the settlement method which is based on unofficial markets. Accordingly, the Bank is translating balances (assets and liabilities) and transactions in foreign currencies at the official published exchange rate, which does not represent a reasonable estimate of expected cash flows in Lebanese Liras that would have to be generated/used from the realisation of such assets or the payment of such liabilities at the date of the transaction or of the separate financial statements.

In addition, IAS 29 requires the use of a general price index to reflect changes in purchasing power. Most governments issue periodic price indices that vary in their scope, but all entities that report in the currency of the same economy should use the same index. The consumer price index is normally closest to the concept of the general price index required by IAS 29 because it is at the end of the supply chain and reflects the impact of prices on the general population's consumption basket. The weights allocated for the calculation of the consumer price index impact the consumer price index and might need to be revisited based on the new behaviour of the population as a result of the crisis facing Lebanon.

2 ACCOUNTING POLICIES (continued)

2.1 Basis of preparation (continued)

Such matters impede a proper application of IAS 29 as any application under the current circumstances would not provide more relevant financial statements to management, shareholders and other users.

The Bank is currently assessing the date at which it will apply IAS 29. The application of IAS 29 is very complex and requires the Bank to develop new accounting software and processes, internal controls and governance framework. Based on the Bank's preliminary assessment, the absence of an official legal payment and settlement mechanism that would reflect in a reasonable manner, the expected cash flows for assets and liabilities in foreign currencies, and the absence of an accurate reflection of price changes impede the useful information that would have been otherwise produced from the application of IAS 29. Accordingly, the Bank has postponed the application of IAS 29 and incurring costs for developing accounting processes and a governance framework until the Bank is comfortable that such application would provide the users with more relevant information.

2.2 New and amended standards and interpretations

The Bank applied for the first time certain amendments to the standards, which are effective for annual periods beginning on or after 1 January 2021. The nature and the impact of each new amendment is described below:

Interest Rate Benchmark Reform – Phase 2: Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16
IBOR reform Phase 2 includes a number of reliefs and additional disclosures. The reliefs apply upon the transition of a financial instrument from an IBOR to a risk-free-rate (RFR). Changes to the basis for determining contractual cash flows as a result of interest rate benchmark reform are required as a practical expedient to be treated as changes to a floating interest rate, provided that, for the financial instrument, the transition from the IBOR benchmark rate to RFR takes place on an economically equivalent basis.

IBOR reform Phase 2 provides temporary reliefs that allow the Bank's hedging relationships to continue upon the replacement of an existing interest rate benchmark with an RFR. The reliefs require the Bank to amend hedge designations and hedge documentation. This includes redefining the hedged risk to reference an RFR, redefining the description of the hedging instrument and / or the hedged item to reference the RFR and amending the method for assessing hedge effectiveness. Updates to the hedging documentation must be made by the end of the reporting period in which a replacement takes place. For the retrospective assessment of hedge effectiveness, the Bank may elect on a hedge by hedge basis to reset the cumulative fair value change to zero. The Bank may designate an interest rate as a non-contractually specified, hedged risk component of changes in the fair value or cash flows of a hedged item, provided the interest rate risk component is separately identifiable, e.g., it is an established benchmark that is widely used in the market to price loans and derivatives.

For new RFRs that are not yet an established benchmark, relief is provided from this requirement provided the Bank reasonably expects the RFR to become separately identifiable within 24 months. For hedges of groups of items, the Bank is required to transfer to subgroups those instruments that reference RFRs. Any hedging relationships that prior to application of IBOR reform Phase 2, have been discontinued solely due to IBOR reform and meet the qualifying criteria for hedge accounting when IBOR reform Phase 2 is applied, must be reinstated upon initial application.

These amendments had no impact on the separate financial statements of the Bank. The Bank intends to use the practical expedients in future periods if they become applicable.

2.3 Standards issued but not yet effective

Certain new standards, amendments to standards and interpretations are not yet effective for the year ended 31 December 2021, with the Bank not opting for early adoption. These have therefore not been applied in preparing these separate financial statements. The most significant of these new standards, amendments and interpretations are as follows:

IFRS 9 Financial Instruments – Fees in the “10 per Cent” Test for Derecognition of Financial Liabilities

As part of its 2018-2020 annual improvements to the IFRS standards process, the IASB issued an amendment to IFRS 9. The amendment clarifies the fees that an entity includes when assessing whether the terms of a new or modified financial liability are substantially different from the terms of the original financial liability.

2 ACCOUNTING POLICIES (continued)

2.3 Standards issued but not yet effective (continued)

IFRS 9 *Financial Instruments* – Fees in the “10 per Cent” Test for Derecognition of Financial Liabilities (continued)

These fees include only those paid or received between the borrower and the lender, including fees paid or received by either the borrower or lender on the other’s behalf. An entity applies the amendment to financial liabilities that are modified or exchanged on or after the beginning of the annual reporting period in which the entity first applies the amendment.

The amendment is effective for annual reporting periods beginning on or after 1 January 2022 with earlier adoption permitted. The Bank will apply the amendments to financial liabilities that are modified or exchanged on or after the beginning of the annual reporting period in which the entity first applies the amendment. The amendments are not expected to have a material impact on the Bank.

Definition of Accounting Estimates – Amendments to IAS 8

In February 2021, the IASB issued amendments to IAS 8, in which it introduces a definition of “accounting estimates”. The amendments clarify the distinction between changes in accounting estimates and changes in accounting policies and the correction of errors. Also, they clarify how entities use measurement techniques and inputs to develop accounting estimates.

The amendments are effective for annual reporting periods beginning on or after 1 January 2023, and apply to changes in accounting policies and changes in accounting estimates that occur on or after the start of that period. Earlier application is permitted as long as this fact is disclosed. The amendments are not expected to have a material impact on the Bank.

Amendments to IAS 1: *Classification of Liabilities as Current or Non-current*

In January 2020, the IASB issued amendments to paragraphs 69 to 76 of IAS 1 to specify the requirements for classifying liabilities as current or non-current. The amendments clarify:

- What is meant by a right to defer settlement.
- That a right to defer must exist at the end of the reporting period.
- That classification is unaffected by the likelihood that an entity will exercise its deferral right.
- That only if an embedded derivative in a convertible liability is itself an equity instrument would the terms of a liability not impact its classification.

The amendments are effective for annual reporting periods beginning on or after 1 January 2023 and must be applied retrospectively. The amendments are not expected to have a material impact on the Bank.

Onerous Contracts – Costs of Fulfilling a Contract – Amendments to IAS 37

In May 2020, the IASB issued amendments to IAS 37 to specify which costs an entity needs to include when assessing whether a contract is onerous or loss-making. The amendments apply a “directly related cost approach”. The costs that relate directly to a contract to provide goods or services include both incremental costs and an allocation of costs directly related to contract activities. General and administrative costs do not relate directly to a contract and are excluded unless they are explicitly chargeable to the counterparty under the contract. The amendments are effective for annual reporting periods beginning on or after 1 January 2022. The amendments are not expected to have a material impact on the Bank.

Disclosure of Accounting Policies – Amendments to IAS 1 and IFRS Practice Statement 2

In February 2021, the IASB issued amendments to IAS 1 and IFRS Practice Statement 2 Making Materiality Judgments, in which it provides guidance and examples to help entities apply materiality judgments to accounting policy disclosures. The amendments aim at helping entities provide accounting policy disclosures that are more useful by replacing the requirement for entities to disclose their “significant” accounting policies” with a requirement to disclose their “material” accounting policies and adding guidance on how entities apply the concept of materiality in making decisions about accounting policy disclosures. The amendments to IAS 1 are applicable for annual periods beginning on or after 1 January 2023 with earlier application permitted. Since the amendments to the Practice Statement 2 provide non-mandatory guidance on the application of the definition of material to accounting policy information, an effective date for these amendments is not necessary. The amendments are not expected to have a material impact on the Bank.

2 ACCOUNTING POLICIES (continued)**2.4 Summary of significant accounting policies****Foreign currencies**

The separate financial statements are presented in Lebanese Lira (LL), which is also Bank's functional currency. Each foreign branch of the Bank determines its own functional currency and items included in the separate financial statements of each foreign branch are measured using that functional currency.

(i) Transactions and balances

Transactions in foreign currencies are initially recorded at the functional currency rate of exchange ruling at the date of the transaction.

Monetary assets and liabilities denominated in foreign currencies are retranslated at the functional currency rate of exchange at the date of the statement of financial position. All differences are taken to "Net loss from financial assets at fair value through profit or loss" in the separate income statement, except for monetary items that are designated as part of the hedge of the Bank's net investment in a foreign operation. These are recognized in OCI until the net investment is disposed of, at which time, the cumulative amount is reclassified to profit or loss. Tax charges and credits attributable to exchange differences on those monetary items are also recorded in OCI.

Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates as at the dates of the initial transactions. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value was determined. The gain or loss arising on translation of non-monetary items measured at fair value is treated in line with the recognition of gain or loss on change in fair value of the item (i.e. translation differences on items whose fair value gain or loss is recognized in other comprehensive income or profit or loss are also recognized in other comprehensive income or profit or loss, respectively).

(ii) Translation of foreign branches

As at the reporting date, the assets and liabilities of overseas branches are translated into the Bank's presentation currency at the rate of exchange as at the reporting date, and their income statements are translated at the weighted average exchange rates for the year. Exchange differences arising on translation are recognized in OCI. On disposal of a foreign branch, the deferred cumulative amount recognized in OCI relating to that particular foreign branch is reclassified to the separate income statement.

The table below presents the exchange rates of the currencies used to translate assets, liabilities and statement of income items of foreign branches:

	2021		2020	
	Year-end rate LL	Average rate LL	Year-end rate LL	Average rate LL
US Dollar	1,507.5	1,507.5	1,507.50	1,507.50
Euro	1,701.52	1,783.97	1,851.21	1,720.19
Jordanian Dinar	2,126.23	2,126.23	2,126.23	2,126.23
Iraqi Dinar	1.03	1.03	1.03	1.03

Financial instruments – initial recognition**(i) Date of recognition**

All financial assets and liabilities are initially recognized on the settlement date. 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.

(ii) Initial measurement of financial instruments

Financial instruments are initially measured at their fair value, plus or minus, in the case of a financial instrument not at fair value through profit or loss, transaction costs that are directly attributable to the acquisition or issue of the financial instrument. In the case of a financial instrument measured at fair value, with the change in fair value being recognized in profit or loss, the transaction costs are recognized as revenue or expense when the instrument is initially recognized. When the fair value of financial instruments at initial recognition differs from the transaction price, the Bank accounts for the Day 1 profit or loss, as described below.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Financial instruments – initial recognition (continued)

(iii) *Day 1 Profit or Loss*

When the transaction price differs from the fair value at origination and the fair value is based on a valuation technique using only observable inputs in market transactions, the Bank immediately recognizes the difference between the transaction price and fair value (a “Day 1” profit or loss) in the separate income statement. In cases where fair value is based on models for which some of the inputs are not observable, the difference between the transaction price and the fair value is deferred and is only recognized in the separate income statement when the inputs become observable, or when the instrument is derecognized. On initial recognition, financial assets are classified as measured at: amortized cost, fair value through other comprehensive income or fair value through profit or loss on the basis of two criteria:

- (i) The business model within which financial assets are measured; and
- (ii) Their contractual cash flow characteristics (whether the cash flows represent “solely payments of principal and interest” (SPPI)).

Financial assets are measured at amortized cost if they are held within a business model whose objective is to hold assets to collect contractual cash flows, and their contractual cash flows represent SPPI.

Financial assets – classification and measurement

Financial assets are measured at fair value through other comprehensive income if they are held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets, and their contractual cash flows represent SPPI. All other financial assets are classified as measured at fair value through profit or loss.

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

On initial recognition, the Bank may irrevocably designate a financial asset as measured at fair value through profit or loss if doing so eliminates or significantly reduces a measurement or recognition inconsistency (sometimes referred to as an “accounting mismatch”) that would otherwise arise from measuring assets or liabilities or recognizing the gains and losses on them on different bases. The Bank is required to disclose such financial assets separately from those mandatorily measured at fair value.

Business model

The Bank determines its business model at the level that best reflects how it manages groups of financial assets to achieve its business objective. Generally, a business model is a matter of fact which can be evidenced by the way business is managed and the information provided to Management.

The Bank's business model is not assessed on an instrument-by-instrument basis, but at a higher level of aggregated portfolios and is based on observable factors such as:

- How the performance of the business model and the financial assets held within that business model are evaluated and reported to the entity's key management personnel.
- The risks that affect the performance of the business model (and the financial assets held within that business model) and, in particular, the way those risks are managed.
- How managers of the business are compensated (for example, whether the compensation is based on the fair value of the assets managed or on the contractual cash flows collected).
- The expected frequency, value and timing of sales are also important aspects of the Bank's assessment.

The business model assessment is based on reasonably expected scenarios without taking 'worst case' or 'stress case' scenarios into account. The Bank's business model can be to hold financial assets to collect contractual cash flows even when sales of financial assets occur. However, if more than an infrequent number of sales are made out of a portfolio, the Bank needs to assess whether and how such sales are consistent with an objective of collecting contractual cash flows. If the objective of the Bank's business model for managing those financial assets changes, the Bank is required to reclassify financial assets.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Financial assets – classification and measurement (continued)

The SPPI test

As a second step of its classification process the Bank assesses the contractual terms of financial assets to identify whether they meet the SPPI test.

‘Principal’ for the purpose of this test is defined as the fair value of the financial asset at initial recognition and may change over the life of the financial asset (for example, if there are repayments of principal or amortization of the premium/discount).

The most significant elements of interest within a lending arrangement are typically the consideration for the time value of money and credit risk. To make the SPPI assessment, the Bank applies judgement and considers relevant factors such as the currency in which the financial asset is denominated, and the period for which the interest rate is set.

In contrast, contractual terms that introduce a more than de minimis exposure to risks or volatility in the contractual cash flows that are unrelated to a basic lending arrangement do not give rise to contractual cash flows that are solely payments of principal and interest on the amount outstanding. In such cases, the financial asset is required to be measured at fair value through profit and loss.

Financial assets at amortized cost

Balances with Central Banks, Due from Banks and Financial Institutions, Due from Sister Banks, Loans to Banks and Financial Institutions and Loans and Advances to Customers and Related Parties at Amortized Cost and Finance Assets at Amortized Cost

These financial assets are initially recognized at cost, being the fair value of the consideration paid for the acquisition of the investment. All transaction costs directly attributed to the acquisition are also included in the cost of investment. After initial measurement, these are subsequently measured at amortized cost using the EIR, less expected credit losses. Amortized cost is calculated by taking into account any discount or premium on acquisition and fees and costs that are an integral part of the EIR. The amortization is included in “interest and similar income” in the separate income statement. The losses arising from impairment are recognized in the separate income statement in “net impairment losses on financial assets”. Gains and losses arising from the derecognition of financial assets measured at amortized cost are reflected under “net loss from derecognition of financial assets at amortized cost” in the separate income statement.

Financial assets at fair value through other comprehensive income

These financial assets are initially recognized at cost, being the fair value of the consideration paid for the acquisition of the investment. All transaction costs directly attributed to the acquisition are also included in the cost of investment. After initial measurement, these are subsequently measured at fair value with gains and losses arising due to changes in fair value recognized in other comprehensive income. Interest income and foreign exchange gains and losses are recognized in profit or loss in the same manner as for financial assets measured at amortized cost. On derecognition, cumulative gains or losses previously recognized in other comprehensive income are reclassified from other comprehensive income to profit or loss.

Equity instruments at fair value through other comprehensive income

Upon initial recognition, the Bank can elect to classify irrevocably some of its investments in equity instruments at fair value through other comprehensive income when they are not held for trading. Such classification is determined on an instrument-by-instrument basis.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Financial assets – classification and measurement (continued)

Financial assets at fair value through other comprehensive income (continued)

Equity instruments at fair value through other comprehensive income (continued)

These financial assets are initially measured at fair value plus transaction costs. Subsequently, they are measured at fair value, with gains and losses arising from changes in fair value recognised in other comprehensive income and accumulated under equity. The cumulative gain or loss will not be reclassified to the separate income statement on disposal of the investments. Equity instruments at fair value through other comprehensive income are not subject to an impairment assessment.

Financial assets at fair value through profit or loss

Included in this category are those debt instruments that do not meet the conditions in “*financial assets at amortized cost*” and “*financial assets at fair value through other comprehensive income*” above, debt instruments designated at fair value through profit or loss upon initial recognition, and equity instruments at fair value through profit or loss. Management only designates a financial asset at fair value through profit and loss upon initial recognition when the designation eliminates, significantly reduces, the inconsistent treatment that would otherwise arise from measuring assets or recognizing gains and losses on them on a different basis.

Debt instruments at fair value through profit or loss

These financial assets are recorded in the separate statement of financial position at fair value. Transaction costs directly attributable to the acquisition of the instrument are recognized as revenue or expense when the instrument is initially recognized. Changes in fair value and interest income are recorded under “net (loss) gain from financial assets at fair value through profit or loss” in the separate income statement. Gains and losses arising from the derecognition of debt instruments and other financial assets at fair value through profit or loss are also reflected under “net (loss) gain from financial assets at fair value through profit or loss” in the separate income statement, showing separately those related to financial assets designated at fair value upon initial recognition from those mandatorily measured at fair value.

Equity instruments at fair value through profit or loss

Investments in equity instruments are classified at fair value through profit or loss, unless the Bank designates at initial recognition an investment that is not held for trading as at fair value through other comprehensive income. These financial assets are recorded in the separate statement of financial position at fair value. Changes in fair value and dividend income are recorded under “net (loss) gain from financial assets at fair value through profit or loss” in the separate income statement. Gains and losses arising from the derecognition of equity instruments at fair value through profit or loss are also reflected under “net (loss) gain from financial assets at fair value through profit or loss” in the separate income statement.

Financial liabilities (other than financial guarantees, letters of credit and loan commitments) – classification and measurement

Liabilities are initially measured at fair value plus, in the case of a financial liability not at fair value through profit or loss, particular transaction costs. Liabilities are subsequently measured at amortized cost or fair value.

The Bank classifies all financial liabilities as subsequently measured at amortized cost using the effective interest rate method, except for:

- Financial liabilities at fair value through profit or loss (including derivatives);
- Financial liabilities that arise when a transfer of a financial asset does not qualify for derecognition or when the continuing involvement approach applies;
- Contingent consideration recognized in a business combination in accordance with IFRS 3.

The Bank may, at initial recognition, irrevocably designate a financial liability as measured at fair value through profit or loss when:

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Financial liabilities (other than financial guarantees, letters of credit and loan commitments) – classification and measurement (continued)

- Doing so results in more relevant information, because it either eliminates or significantly reduces a measurement or recognition inconsistency (sometimes referred to as “an accounting mismatch”) that would otherwise arise from measuring assets or liabilities or recognizing the gains and losses on them on different bases; or
- A group of financial liabilities or financial assets and financial liabilities is managed and its performance is evaluated on a fair value basis, in accordance with a documented risk management or investment strategy, and information about the group is provided internally on that basis to the Bank’s Key Management Personnel; or
- A group of financial liabilities contains one or more embedded derivatives, unless they do not significantly modify the cash flows that would otherwise be required by contract, or it is clear with little or no analysis when a similar instruments is first considered that separation of the embedded derivatives is prohibited.

Financial liabilities at fair value through profit and loss are recorded in the separate statement of financial position at fair value. Changes in fair value are recorded in profit and loss with the exception of movements in fair value of liabilities designated at through profit and loss due to changes in the Bank’s own credit risk. Such changes in fair value are recognized in other comprehensive income, unless such recognition would create an accounting mismatch in the separate income statement. Changes in fair value attributable to changes in credit risk do not get recycled to the separate income statement.

Interest incurred on financial liabilities designated at fair value through profit and loss is accrued in interest expense using the EIR, taking into account any discount/ premium and qualifying transaction costs being an integral part of instrument.

Debt issued and other borrowed funds

Financial instruments issued by the Bank, which are not designated at fair value through profit or loss, are classified under “debt issued and other borrowed funds” where the substance of the contractual arrangement results in the Bank having an obligation either to deliver cash or another financial asset to the holder, or to satisfy the obligation other than by the exchange of a fixed amount of cash or another financial asset for a fixed number of own equity shares.

After initial measurement, debt issued and other borrowings are subsequently measured at amortized cost using the effective interest rate method. Amortized cost is calculated by taking into account any discount or premium on the issue and costs that are an integral part of the effective interest rate method.

A compound financial instrument which contains both a liability and an equity component is separated at the issue date. A portion of the net proceeds of the instrument is allocated to the debt component on the date of issue based on its fair value (which is generally determined based on the quoted market prices for similar debt instruments). The equity component is assigned the residual amount after deducting from the fair value of the instrument as a whole the amount separately determined for the debt component. The value of any derivative features (such as a call option) embedded in the compound financial instrument other than the equity component is included in the debt component.

Due to Central Banks, Banks and Financial Institutions, Sister Banks and Customers’ and Related Parties’ Deposits

After initial measurement, due to central banks, banks and financial institutions, sister banks and customers’ and related parties’ deposits are measured at amortized cost less amounts repaid using the effective interest rate method. Amortized cost is calculated by taking into account any discount or premium on the issue and costs that are an integral part of the effective interest rate method. Customer deposits which are linked to the performance of indices or commodities are subsequently measured at fair value through profit or loss.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Derivatives recorded at fair value through profit or loss

A derivative is a financial instrument or other contract with all three of the following characteristics:

- a) Its value changes in response to the change in a specified interest rate, financial instrument price, commodity price, foreign exchange rate, index of prices or rates, credit rating or credit index, or other variable, provided in the case of a non-financial variable that the variable is not specific to a party to the contract (aka the “underlying”).
- b) It requires no initial net investment or an initial net investment that is smaller than would be required for other types of contracts that would be expected to have a similar response to changes in market factors.
- c) It is settled at a future date.

The Bank enters into derivative transactions with various counterparties. These include interest rate swaps, forward foreign exchange contracts and currency options.

Derivatives are recorded at fair value and carried as assets when their fair value is positive and as liabilities when their fair value is negative. The notional amount and fair value of such derivatives are disclosed separately in the notes. Changes in the fair value of derivatives are recognized in “net (loss) gain from financial assets at fair value through profit or loss” in the separate income statement, unless hedge accounting is applied, which is discussed in under “hedge accounting policy” below.

Embedded derivatives

An embedded derivative is a component of a hybrid instrument that also includes a non-derivative host contract with the effect that some of the cash flows of the combined instrument vary in a way similar to a stand-alone derivative. An embedded derivative causes some or all of the cash flows that otherwise would be required by the contract to be modified according to a specified interest rate, financial instrument price, commodity price, foreign exchange rate, index of prices or rates, credit rating or credit index, or other variable, provided that, in the case of a non-financial variable, it is not specific to a party to the contract. A derivative that is attached to a financial instrument, but is contractually transferable independently of that instrument, or has a different counterparty from that instrument, is not an embedded derivative, but a separate financial instrument.

An embedded derivative is separated from the host and accounted for as a derivative if, and only if:

- (a) The hybrid contract contains a host that is not an asset within the scope of IFRS 9;
- (b) The economic characteristics and risks of the embedded derivative are not closely related to the economic characteristics and risks of the host;
- (c) A separate instrument with the same terms as the embedded derivative would meet the definition of a derivative; and
- (d) The hybrid contract is not measured at fair value with changes in fair value recognized in profit or loss.

Financial guarantees, letters of credit and undrawn loan commitments

Financial guarantees are initially recognized in the separate 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 amount initially recognized less cumulative amortization recognized in the separate income statement, and an ECL provision. The premium received is recognized in the income statement in “Net fees and commission income” on a straight line basis over the life of the guarantee.

Undrawn loan commitments and letters of credits are commitments under which, over the duration of the commitment, the Bank is required to provide a loan with pre-specified terms to the customer. Similar to financial guarantee contracts, these contracts are in the scope of ECL requirements.

The nominal contractual value of financial guarantees, letters of credit and undrawn loan commitments are not recorded in the statement of financial position. The nominal values of these instruments together with the corresponding ECLs are disclosed in the notes.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Reclassification of financial assets

The Bank reclassifies financial assets if the objective of the business model for managing those financial assets changes. Such changes are expected to be very infrequent and are determined by the Bank's Senior Management as a result of external or internal changes when significant to the Bank's operations and demonstrable to external parties.

If financial assets are reclassified, the reclassification is applied prospectively from the reclassification date, which is the first day of the first reporting period following the change in business model that results in the reclassification of financial assets. Any previously recognized gains, losses or interest are not restated.

If a financial asset is reclassified so that it is measured at fair value, its fair value is determined at the reclassification date. Any gain or loss arising from a difference between the previous carrying amount and fair value is recognized in profit or loss. If a financial asset is reclassified so that it is measured at amortized cost, its fair value at the reclassification date becomes its new carrying amount.

Derecognition of financial assets and financial liabilities

Financial assets

(i) Derecognition due to substantial modification of terms and conditions

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

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

If cash flows are modified when the borrower is in financial difficulties, then the objective of the modification is usually to maximize recovery of the original contractual terms rather than to originate a new asset with substantially different terms. If the Bank plans to modify a financial asset in a way that would result in forgiveness of cash flows, then it first considers whether a portion of the asset should be written off before the modification takes place (see below).

If the modification of a financial asset measured at amortized cost or fair value through other comprehensive income does not result in derecognition of the financial asset, then the Bank first recalculates the gross carrying amount of the financial asset using the original effective interest rate of the asset and recognizes the resulting adjustment as a modification gain or loss in profit or loss. For floating-rate financial assets, the original effective interest rate used to calculate the modification gain or loss is adjusted to reflect current market terms at the time of the modification. Any costs or fees incurred and fees received as part of the modification adjust the gross carrying amount of the modified financial asset and are amortized over the remaining term of the modified financial asset.

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

(ii) Derecognition other than for substantial modification

A financial asset (or where applicable, a part of a financial asset or part of a group of similar financial assets) is derecognized when the rights to receive cash flows from the financial asset have expired. The Bank also derecognizes the financial asset if it has both transferred the financial asset and the transfer qualifies for derecognition.

The Bank has transferred the financial asset if, and only if, either:

- The Bank has transferred its contractual rights to receive cash flows from the financial asset; or
- The Bank retains the rights to the cash flows, but has assumed an obligation to pay the received cash flows in full without material delay to a third party under a "pass-through" arrangement.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Derecognition of financial assets and financial liabilities (continued)

Financial assets (continued)

(ii) Derecognition other than for substantial modification (continued)

Pass-through arrangements are transactions whereby the Bank retains the contractual rights to receive the cash flows of a financial asset (the 'original asset'), but assumes a contractual obligation to pay those cash flows to one or more entities (the 'eventual recipients'), when all of the following three conditions are met:

- The Bank has no obligation to pay amounts to the eventual recipients unless it has collected equivalent amounts from the original asset, excluding short-term advances with the right to full recovery of the amount lent plus accrued interest at market rates;
- The Bank cannot sell or pledge the original asset other than as security to the eventual recipients; and
- The Bank has to remit any cash flows it collects on behalf of the eventual recipients without material delay. In addition, the Bank is not entitled to reinvest such cash flows, except for investments in cash or cash equivalents including interest earned, during the period between the collection date and the date of required remittance to the eventual recipients.

A transfer only qualifies for derecognition if either:

- The Bank has transferred substantially all the risks and rewards of the asset; or
- The Bank has neither transferred nor retained substantially all the risks and rewards of the asset, but has transferred control of the asset.

The Bank considers control to be transferred if and only if, the transferee has the practical ability to sell the asset in its entirety to an unrelated third party and is able to exercise that ability unilaterally and without imposing additional restrictions on the transfer.

When the Bank has neither transferred nor retained substantially all the risks and rewards and has retained control of the asset, the asset continues to be recognized only to the extent of the Bank's continuing involvement, in which case, the Bank also recognizes an associated liability. The transferred asset and the associated liability are measured on a basis that reflects the rights and obligations that the Bank has retained.

Continuing involvement that takes the form of a guarantee over the transferred asset is measured at the lower of the original carrying amount of the asset and the maximum amount of consideration the Bank could be required to pay.

If continuing involvement takes the form of a written or purchased option (or both) on the transferred asset, the continuing involvement is measured at the value the Bank would be required to pay upon repurchase. In the case of a written put option on an asset that is measured at fair value, the extent of the entity's continuing involvement is limited to the lower of the fair value of the transferred asset and the option exercise price.

Financial Liabilities

A financial liability is derecognized when the obligation under the liability is discharged or cancelled or expires. Where an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as a derecognition of the original liability and the recognition of a new liability. The difference between the carrying value of the original financial liability and the consideration paid is recognized in the separate income statement, as "other operating income" or "other operating expenses".

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

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Repurchase and reverse repurchase agreements

Securities sold under agreements to repurchase at a specified future date are not derecognized from the statement of financial position as the Bank retains substantially all the risks and rewards of ownership. The corresponding cash received is recognized in the statement of financial position as an asset with a corresponding obligation to return it, including accrued interest as a liability within "Repurchase agreements", reflecting the transaction's economic substance as a loan to the Bank. The difference between the sale and repurchase prices is treated as interest expense and is accrued over the life of the agreement using the EIR. When the counterparty has the right to sell or repledge the securities, the Bank reclassifies those securities in its statement of financial position to "Financial assets at fair value through profit or loss pledged as collateral" as appropriate.

Conversely, securities purchased under agreements to resell at a specified future date are not recognized in the statement of financial position. The consideration paid, including accrued interest is recorded in the statement of financial position within "Cash collateral on securities borrowed and reverse purchase agreements", reflecting the transaction's economic substance as a loan by the Bank. The difference between the purchase and resale prices is recorded in "Net interest income" and is accrued over the life of the agreement using the EIR.

If securities purchased under agreement to resell are subsequently sold to third parties, the obligation to return the securities is recorded as a short sale within "Financial liabilities at fair value through profit or loss" and measured at fair value with any gains or losses included in "Net loss from financial instruments at fair value through profit or loss" in the income statement.

Impairment of financial assets

(i) Overview of the ECL principles

The Bank records the allowance for expected credit losses for all loans and other financial assets not held at fair value through profit or loss, together with loan commitments and financial guarantee contracts, in this section all referred to as 'financial instruments'. Equity instruments are not subject to impairment under IFRS 9.

The ECL allowance is based on the credit losses expected to arise over the life of the asset (the lifetime expected credit loss), unless there has been no significant increase in credit risk since origination, in which cases, the allowance is based on the 12 months' expected credit loss (12mECL). The 12mECL is the portion of lifetime ECLs that represent the ECLs that result from default events on a financial instrument that are possible within the 12 months after the reporting date.

(ii) Measurement of ECLs

The Bank measures ECLs based on three probability-weighted scenarios to measure the expected cash shortfalls, discounted at an approximation to the EIR as follows:

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

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Impairment of financial assets (continued)

(ii) *Measurement of ECLs (continued)*

The key inputs into the measurements of ECL are:

- PD: The Probability of Default is an estimate of the likelihood of default over a given time horizon. A default may only happen at a certain time over the assessed period, if the facility has not been previously derecognized and is still in the portfolio.
- EAD: The Exposure at Default is an estimate of the exposure at a future default date, taking into account expected changes in the exposure after the reporting date, including repayments of principal and interest, whether scheduled by contract or otherwise, and expected drawdowns on committed facilities.
- LGD: The Loss Given Default is an estimate of the loss arising in the case where a default occurs at a given time. It is based on the difference between the contractual cash flows due and those that the Bank would expect to receive, including from the realization of any collateral. It is usually expressed as a percentage of the EAD.

These parameters are generally derived from statistical models and other historical data. Forward looking information is incorporated in ECL measurements.

The Bank measures ECLs using a three-stage approach based on the extent of credit deterioration since origination:

- Stage 1 – Where there has not been a significant increase in credit risk (SICR) since initial recognition of a financial instrument, an amount equal to 12 months expected credit loss is recorded. The expected credit loss is computed using a probability of default occurring over the next 12 months. For these instruments with a remaining maturity of less than 12 months, probability of default corresponding to remaining term to maturity is used.
- Stage 2 – When a financial instrument experiences a SICR subsequent to origination but is not considered to be impaired, it is included in Stage 2. This requires the computation of expected credit loss based on the probability of default over the remaining estimated life of the financial instrument.
- Stage 3 – Financial instruments that are considered to be impaired are included in this stage, the allowance for credit losses captures the lifetime expected credit losses, similar to Stage 2.

(iii) *Forborne and modified loans*

The Bank sometimes makes concessions or modifications to the original terms of loans as a response to the borrower's financial difficulties, rather than taking possession or to otherwise enforce collection of collateral. The Bank considers a loan forborne when such concessions or modifications are provided as a result of the borrower's present or expected financial difficulties and the Bank would not have agreed to them if the borrower had been financially healthy. Indicators of financial difficulties include defaults on covenants, or significant concerns raised by the Credit Risk Department. Forbearance may involve extending the payment arrangements and the agreement of new loan conditions. Once the terms have been renegotiated, any impairment is measured using the original EIR as calculated before the modification of terms. It is the Bank's policy to monitor forborne loans to help ensure that future payments continue to be likely to occur. Derecognition decisions and classification between Stage 2 and Stage 3 are determined on a case-by-case basis. If these procedures identify a loss in relation to a loan, it is disclosed and managed as an impaired Stage 3 forborne asset until it is collected or written off.

When the loan has been renegotiated or modified but not derecognized, the Bank also reassesses whether there has been a significant increase in credit risk. The Bank also considers whether the assets should be classified as Stage 3. Once an asset has been classified as forborne, it will remain forborne for a minimum 12-month probation period. In order for the loan to be reclassified out of the forborne category, the customer has to meet all of the following criteria:

- At least a 12-month probation period has passed,
- Three consecutive payments under the new repayment schedule have been made,
- The borrower has no past dues under any obligation to the Bank,
- All the terms and conditions agreed to as part of the restructuring have been met.

If modifications are substantial, the loan is derecognized, as explained above.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Impairment of financial assets (continued)

(iv) Credit-impaired financial assets

At each reporting date, the Bank assesses whether financial assets carried at amortized cost and debt financial assets carried at fair value through other comprehensive income are credit-impaired (referred to as “Stage 3 financial assets”). A financial asset is “credit impaired” when one or more events that have detrimental impact on the estimated future cash flows of the financial asset have occurred. Evidence that a financial asset is credit-impaired includes the following observable information:

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

(v) Write offs

Financial assets are written off either partially or in their entirety only when the Bank has stopped pursuing the recovery. If the amount to be written off is greater than the accumulated loss allowance, the difference is first treated as an addition to the allowance that is then applied against the gross carrying amount. Any subsequent recoveries are credited to “Net impairment losses on financial assets”.

(vi) Collateral repossessed

The Bank occasionally acquires properties in settlement of loans and advances. Upon initial recognition, those assets are measured at fair value as approved by the regulatory authorities. Subsequently, these properties are measured at the lower of carrying value or net realizable value.

Upon sale of repossessed assets, any gain or loss realized is recognized in the separate income statement under “other operating income” or “other operating expenses”. Gains resulting from the sale of repossessed assets are transferred to “Reserve appropriated for capital increase” in the following financial year.

Fair value measurement

The Bank measures financial instruments, such as derivatives, and non-financial assets, namely land, building and building improvements, at fair value at each balance sheet date. Also, fair values of financial instruments measured at amortized cost are disclosed in the notes.

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either:

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

The principal or the most advantageous market must be accessible by the Bank. The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

A fair value measurement of a non-financial asset takes into account a market participant’s ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

The Bank uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximizing the use of relevant observable inputs and minimizing the use of unobservable inputs.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Fair value measurement (continued)

All assets and liabilities for which fair value is measured or disclosed in the separate financial statements are categorized within the fair value hierarchy, described as follows, based on the lowest level input that is significant to the fair value measurement as a whole:

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

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

Management determines the policies and procedures for both recurring and non-recurring fair value measurement. At each reporting date, Management analyses the movements in the values of assets and liabilities which are required to be re-measured or re-assessed as per the Bank's accounting policies. For this analysis, Management verifies the major inputs applied in the latest valuation by agreeing the information in the valuation computation to contracts and other relevant documents.

For the purpose of fair value disclosures, the Bank has determined classes of assets and liabilities on the basis of the nature, characteristics and risks of the asset or liability and the level of the fair value hierarchy as explained above.

Hedge accounting

In order to manage particular risks, the Bank applies hedge accounting for transactions which meet the specified criteria. The Bank makes use of derivative instruments to manage exposures to foreign currency risk and interest rate fluctuations. The process starts with identifying the hedging instrument and hedged item and preparing hedge documentation detailing the risk management strategy and objective.

Setting the risk management strategy and objectives

At inception of the hedge relationship, the Bank formally documents the relationship between the hedged item and the hedging instrument, including the nature of the risk, the objective and strategy for undertaking the hedge, and the method that will be used to assess the effectiveness of the hedging relationship.

The risk management strategy is established at the level of Board risk management committee and identifies the risks to which the Bank is exposed and whether and how the risk management activities should address those risks. The strategy is typically maintained for a relatively long period of time. However, it may include some flexibility to react to changes in circumstances. The risk management strategy is set out in general documentation and is cascaded down through policies containing more specific guidelines.

The Bank sets risk management objectives at the level of individual hedging relationships and defines how a particular hedging instrument is designated to hedge a particular hedged item. As such, a risk management strategy would usually be supported by many risk management objectives.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Hedge accounting (continued)

Qualifying hedging relationships

The Bank applies hedge accounting for qualifying hedging relationships. A hedging relationship qualifies for hedge accounting only if: (a) the hedging relationship consists only of eligible hedging instruments and eligible hedged items; (b) at the inception of the hedging relationship there is formal designation and documentation of the hedging relationship and the Bank's risk management objective and strategy for undertaking the hedge; and (c) the hedging relationship meets all of the hedge effectiveness requirements.

At each hedge effectiveness assessment date, a hedge relationship must be expected to be highly effective on a prospective basis in order to qualify for hedge accounting. The effectiveness test can be performed qualitatively or quantitatively. A formal assessment is undertaken to ensure the hedging instrument is expected to be highly effective in offsetting the designated risk in the hedged item, both at inception and at each quarter on an ongoing basis. A hedge is expected to be highly effective if:

- There is an economic relationship between the hedged item and the hedging instrument;
- The effect of credit risk does not dominate the value changes that result from that economic relationship; and
- The hedge ratio of the hedging relationship is the same as that resulting from the quantity of the hedged item that the entity actually hedges and the quantity of the hedging instrument that the entity actually uses to hedge that quantity of hedged item. However, that designation shall not reflect an imbalance between the weightings of the hedged item and the hedging instrument that would create hedge ineffectiveness that could result in an accounting outcome that would be inconsistent with the purpose of hedge accounting.

Hedge ineffectiveness is recognised in the separate income statement in "net (loss) gain from financial assets at fair value through profit or loss".

When a Bank separates the intrinsic value and time value of an option contract and designates as the hedging instrument only the change in intrinsic value of the option, it shall account for the time value of the option as follows:

- (a) An entity shall distinguish the time value of options by the type of hedged item that the option hedges:
 - (i) A transaction related hedged item; or
 - (ii) A time-period related hedged item.
- (b) The change in fair value of the time value shall be recognised in other comprehensive income to the extent that it relates to the hedged item and shall be accumulated in a separate component of equity. The cumulative change in fair value shall be accounted for as follows:
 - (i) If the hedged item subsequently results in the recognition of a non-financial asset or a non-financial liability, or a firm commitment for a non-financial asset or a non-financial liability for which fair value hedge accounting is applied, the entity shall remove the amount from the separate component of equity and include it directly in the initial cost or other carrying amount of the asset or the liability. This is not a reclassification adjustment and hence does not affect other comprehensive income;
 - (ii) For hedging relationships other than those covered by (i), the amount shall be reclassified from the separate component of equity to profit or loss as a reclassification adjustment in the same period or periods during which the hedged expected future cash flows affect profit or loss;
 - (iii) However, if all or a portion of that amount is not expected to be recovered in one or more future periods, the amount that is not expected to be recovered shall be immediately reclassified into profit or loss as a reclassification adjustment.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Hedge accounting (continued)

Qualifying hedging relationships (continued)

- (c) The change in fair value of the time value of an option that hedges a time-period related hedged item shall be amortized on a systematic and rational basis over the period during which the hedge adjustment for the option's intrinsic value could affect profit or loss (or other comprehensive income, if the hedged item is an equity instrument for which an entity has elected to present changes in fair value in other comprehensive income). However, if hedge accounting is discontinued for the hedging relationship that includes the change in intrinsic value of the option as the hedging instrument, the net amount (i.e. including cumulative amortisation) that has been accumulated in the separate component of equity shall be immediately reclassified into profit or loss as a reclassification adjustment (see IAS 1).

When a Bank separates the forward element and the spot element of a forward contract and designates as the hedging instrument only the change in the value of the spot element of the forward contract, or when an entity separates the foreign currency basis spread from a financial instrument and excludes it from the designation of that financial instrument as the hedging instrument, the entity may account for the forward element of the forward contract or for the foreign currency basis spread in the same manner as for the time value of an option.

(i) *Fair value hedges*

For qualifying fair value hedges, the gain or loss on the hedging instrument is recognized in the separate income statement under "net (loss) gain from financial assets at fair value through profit or loss". Hedging gain or loss on the hedged item adjusts the carrying amount of the hedged item and is recognized in the separate income statement also under "net (loss) gain from financial assets at fair value through profit or loss".

If the hedging instrument expires or is sold, terminated or exercised, or when the hedge no longer meets the criteria for hedge accounting, or the Bank decides to voluntarily discontinue the hedging relationship, the hedge relationship is discontinued prospectively. If the relationship does not meet the hedge effectiveness criteria, the Bank discontinues hedge accounting from the last date on which compliance with hedge effectiveness was demonstrated.

If the hedge accounting relationship is terminated for an item recorded at amortized cost, the accumulated fair value hedge adjustment to the carrying amount of the hedged item is amortized over the remaining term of the original hedge by recalculating the EIR. If the hedged item is derecognised, the unamortized fair value adjustment is recognised immediately in the separate income statement.

For fair value hedge relationships where the hedged item is not measured at amortized cost, such as debt instruments at fair value through other comprehensive income, changes in fair value that were recorded in the separate income statement whilst hedge accounting was in place are amortized in a similar way to amortized cost instruments using the EIR method. However, as these instruments are measured at their fair values in the separate statement of financial position, the fair value hedge adjustments are transferred from the separate income statement to other comprehensive income.

(ii) *Cash flow hedges*

For qualifying cash flow hedges, a separate component of equity associated with the hedged item (cash flow hedge reserve) is adjusted to the lower of the following (in absolute amounts):

- a) The cumulative gain or loss on the hedging instrument from inception of the hedge; and
- b) The cumulative change in fair value (present value) of the hedged item from inception of the hedge.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Hedge accounting (continued)

Qualifying hedging relationships (continued)

(ii) Cash flow hedges (continued)

The portion of the gain or loss on the hedging instrument that is determined to be an effective hedge (the portion that is offset by the change in the cash flow hedge reserve described above) shall be recognised in other comprehensive income. Any remaining gain or loss on the hedging instrument is hedge ineffectiveness that shall be recognised in the separate income statement. The amount that has been accumulated in the cash flow hedge reserve and associated with the hedged item is treated as follows:

- a) If a hedged forecast transaction subsequently results in the recognition of a non-financial asset or non-financial liability, the Bank removes that amount from the cash flow hedge reserve and includes it directly in the initial cost or other carrying amount of the asset or the liability without affecting other comprehensive income.
- b) For cash flow hedges other than those covered by a), that amount is reclassified from the cash flow hedge reserve to profit or loss as a reclassification adjustment in the same period or periods during which the hedged expected future cash flows affect profit or loss. However, if that amount is a loss and the Bank expects that all or a portion of that loss will not be recovered in one or more future periods, it immediately reclassifies the amount that is not expected to be recovered into profit or loss as a reclassification adjustment.

When a hedging instrument expires, is sold, terminated, exercised, or when a hedge no longer meets the criteria for hedge accounting, any cumulative gain or loss that has been recognised in other comprehensive income at that time remains in other comprehensive income and is recognised when the hedged forecast transaction is ultimately recognised in the separate income statement. When a forecast transaction is no longer expected to occur, the cumulative gain or loss that was reported in other comprehensive income is immediately transferred to the separate income statement.

(iii) Hedge of net investments

Hedges of net investments in a foreign operation, including a hedge of a monetary item that is accounted for as part of the net investment, are accounted for in a way similar to cash flow hedges. Gains or losses on the hedging instrument relating to the effective portion of the hedge are recognized directly in other comprehensive income while any gains or losses relating to the ineffective portion are recognized in the income statement. On disposal or partial disposal of the foreign operation, the cumulative value of any such gains or losses recognized directly in the foreign currency translation reserve is transferred to the separate income statement as a reclassification adjustment.

Leases

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

Bank as a lessee

The Bank applies a single recognition and measurement approach for all leases, except for short-term leases and leases of low-value assets. The Bank recognises lease liabilities to make lease payments and right-of-use assets representing the right to use the underlying assets.

(i) Right-of-use assets

The Bank recognises right-of-use assets at the commencement date of the lease (i.e., the date the underlying asset is available for use). Right-of-use assets are measured at cost, less any accumulated depreciation and impairment losses, and adjusted for any remeasurement of lease liabilities. The cost of right-of-use assets includes the amount of lease liabilities recognised, initial direct costs incurred, and lease payments made at or before the commencement date less any lease incentives received. Right-of-use assets are depreciated on a straight-line basis over the lease term. The right-of-use assets are presented within "Property, equipment and right-of-use assets" on the separate financial statements and are subject to impairment in line with the Bank's policy as described under Impairment of non-financial assets.

Depreciation charge for right-of-use assets presented within "Depreciation of property, equipment and right-of-use assets" on the separate financial statements.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Leases (continued)

Bank as a lessee (continued)

(ii) Lease liabilities

At the commencement date of the lease, the Bank recognises lease liabilities measured at the present value of lease payments to be made over the lease term. The lease payments include fixed payments (including in-substance fixed payments) less any lease incentives receivable, variable lease payments that depend on an index or a rate, and amounts expected to be paid under residual value guarantees. The lease payments also include the exercise price of a purchase option reasonably certain to be exercised by the Bank and payments of penalties for terminating a lease, if the lease term reflects the Bank exercising the option to terminate. The variable lease payments that do not depend on an index or a rate are recognised as expense in the period on which the event or condition that triggers the payment occurs.

In calculating the present value of lease payments, the Bank uses the incremental borrowing rate at the lease commencement date if the interest rate implicit in the lease is not readily determinable. After the commencement date, the amount of lease liabilities is increased to reflect the accretion of interest and reduced for the lease payments made. In addition, the carrying amount of lease liabilities is remeasured if there is a modification, a change in the lease term, a change in the in-substance fixed lease payments or a change in the assessment to purchase the underlying asset.

The Bank's lease liabilities are included under "other liabilities". Moreover, the interest charge on lease liabilities is presented within "interest and similar expenses" from financial instruments measured at amortized cost in separate financial statements.

(iii) Short-term leases and leases of low-value assets

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

Other rental expenses (including non-lease components paid to landlords) presented within other operating expenses.

Bank as a lessor

Leases in which the Bank does not transfer substantially all the risks and rewards incidental to ownership of an asset are classified as operating leases. Rental income arising is accounted for on a straight-line basis over the lease terms and is included in revenue in the statement of profit or loss due to its operating nature. Initial direct costs incurred in negotiating and arranging an operating lease are added to the carrying amount of the leased asset and recognised over the lease term on the same basis as rental income. Contingent rents are recognised as revenue in the period in which they are earned.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Revenue recognition

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

(i) Interest and similar income and expense

The effective interest rate

Interest income and expense are recognized in the income statement applying the EIR method for all financial instruments measured at amortized cost and financial instruments designated at fair value through profit or loss.

The EIR is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial asset or financial liability to the gross carrying amount of a financial asset or to the amortized cost of a financial liability. When calculating the EIR for financial instruments other than purchased or originated credit impaired, an entity shall take into account all the contractual terms of the financial instrument (for example, prepayment, extension, call and similar options) but shall not consider the expected credit losses. For purchased or originated credit impaired financial assets, a credit adjusted effective interest rate is calculated using estimated future cash flows and expected credit losses.

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

Interest income and interest expense

The effective interest rate of a financial asset or a financial liability is calculated on initial recognition of the financial asset or financial liability. In determining interest income and expense, the EIR is applied to the gross carrying amount of the financial asset (unless the asset is credit-impaired) or the amortized cost of a financial liability. The effective interest rate is revised as a result of periodic re-estimation of cash flows of floating rate instruments to reflect movements in market rates of interest. The effective interest rate is also revised for fair value hedge adjustments at the date amortization of the hedge adjustment begins.

The calculation includes all fees and points paid or received between parties to the contract that are an integral part of the effective interest rate, transaction costs, and all other premiums or discounts, unless the financial instrument is measured at fair value, with the change in fair value being recognized in profit or loss. In those cases, the fees are recognized as revenue or expense when the instrument is initially recognized.

When a financial asset becomes credit-impaired after initial recognition, interest income is determined by applying EIR to the net amortized cost of the instrument. If the financial asset cures and is no longer credit-impaired, the Bank reverts back to calculating interest income on a gross basis. Furthermore, for financial assets that were credit-impaired on initial recognition, interest is determined by applying a credit-adjusted EIR to the amortized cost of the instrument. The calculation of interest income does not revert to a gross basis, even if the credit risk of the asset improves.

Presentation

Interest income on financial assets at amortized cost calculated using the effective interest method is presented in the separate income statement under "Interest and similar income". Interest expense on financial assets at amortized cost is presented in the separate income statement under "Interest and similar expense".

Interest income and expense on financial instruments measured at fair value through profit or loss are presented under "Net (loss) gain from financial assets at fair value through profit or loss" in the separate income statement.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Revenue recognition (continued)

(ii) Fee and commission income

The Bank earns fee and commission income from a diverse range of services it provides to its customers. Fee income can be divided into the following two categories:

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

Fees earned for the provision of services over a period of time are accrued over that period. These fees include commission income and asset management, custody and other management and advisory fees.

Loan commitment fees for loans that are likely to be drawn down and other credit related fees are deferred (together with any incremental costs) and recognized as an adjustment to the effective interest rate on the loan. When it is unlikely that a loan be drawn down, the loan commitment fees are recognized as revenues on expiry.

Fee income from providing transaction services

Fees arising from negotiating or participating in the negotiation of a transaction for a third party, such as the arrangement of the acquisition of shares or other securities or the purchase or sale of businesses, are recognized on completion of the underlying transaction. Fees or components of fees that are linked to a certain performance are recognized after fulfilling the corresponding criteria.

(iii) Dividend income

Dividend income is recognized when the Bank's right to receive the payment is established.

(iv) Net gain from financial assets at fair value through profit or loss

Net income from financial instruments at fair value through profit or loss comprises gains and losses related to trading assets and liabilities, non-trading derivatives held for risk management purposes that do not form part of qualifying hedging relationships, financial assets and financial liabilities designated as at fair value through profit or loss and, also non-trading assets mandatorily measured at fair value through profit or loss. The line item includes fair value changes, interest, dividends and foreign exchange differences.

Cash and cash equivalents

"Cash and cash equivalents" as referred to in the cash flow statement comprise balances with original maturities of a period of three months or less including: cash and balances with central banks, deposits with banks and financial institutions, deposits with sister banks, due to central banks, deposits due to banks and financial institutions and deposits due to sister banks.

Investments in subsidiaries

Investments in subsidiaries are accounted for under the equity method. Subsidiaries are enterprises which the Bank controls.

Under the equity method, the investment in subsidiaries is initially recognised at cost. The carrying amount of the investment is adjusted to recognise changes in the Bank's share of net assets of the subsidiary since the acquisition date. Goodwill relating to the subsidiary is included in the carrying amount of the investment and is not tested for impairment separately.

The statement of profit or loss reflects the Bank's share of the results of operations of the subsidiary. Any change in OCI of those investees is presented as part of the Bank's OCI. In addition, when there has been a change recognised directly in the equity of the subsidiary, the Bank recognises its share of any changes, when applicable, in the separate statement of changes in equity. Unrealised gains and losses resulting from transactions between the Bank and the subsidiary are eliminated to the extent of the interest in the subsidiary.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Investments in subsidiaries (continued)

The aggregate of the Bank's share of profit or loss of a subsidiary is shown on the face of the separate statement of profit or loss outside operating profit.

The financial statements of the subsidiary are prepared for the same reporting period as the Bank. When necessary, adjustments are made to bring the accounting policies in line with those of the Bank.

After application of the equity method, the Bank determines whether it is necessary to recognise an impairment loss on its investment in its subsidiary. At each reporting date, the Bank determines whether there is objective evidence that the investment in the subsidiary is impaired. If there is such evidence, the Bank calculates the amount of impairment as the difference between the recoverable amount of the subsidiary and its carrying value, and then recognises the loss within 'Share of profit of subsidiaries' in the separate statement of profit or loss.

If the ownership interest in a subsidiary is reduced but significant influence is retained, only a proportionate share of the amounts previously recognised in other comprehensive income is transferred to separate income statement where appropriate. Upon loss of control and significant influence over the subsidiary, the Bank measures and recognises any retained investment at its fair value. Any difference between the carrying amount of the subsidiary upon loss of control and significant influence and the fair value of the retained investment and proceeds from disposal is recognised in profit or loss.

Property and equipment

Property and equipment is stated at cost excluding the costs of day-to-day servicing, less accumulated depreciation and accumulated impairment in value. Such cost includes the cost of replacing part of the property and equipment. When significant parts of property and equipment are required to be replaced at intervals, the Bank recognizes such parts as individual assets with specific useful lives and depreciates them accordingly. Likewise, when a major inspection is performed, its cost is recognized in the carrying amount of the equipment as a replacement if the recognition criteria are satisfied. All other repair and maintenance costs are recognized in the separate income statement as incurred. The present value of the expected cost for the decommissioning of an asset after its use is included in the cost of the respective asset if the recognition criteria for a provision are met.

Changes in the expected useful life are accounted for by changing the depreciation period or method, as appropriate and treated as changes in accounting estimates.

Depreciation is calculated using the straight line method to write down the cost of property and equipment to their residual values over their estimated useful lives. Land is not depreciated. The estimated useful lives are as follows:

Buildings	50 years
Furniture, office installations and computer equipment	(2 – 16.67) years
Vehicles	6.67 years

Any item of property and equipment and any significant part initially recognized are derecognized upon disposal or when no future economic benefits are expected from its use. Any gain or loss arising on derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in the separate income statement when the asset is derecognized. The asset's residual lives and methods of depreciation are reviewed at each financial year end and adjusted prospectively if applicable.

Intangible assets

An intangible asset is recognized only when its cost can be measured reliably and it is probable that the expected future economic benefits that are attributable to it will flow to the Bank. The Bank's intangible assets include the value of computer software and key money.

Intangible assets acquired separately are measured on initial recognition at cost. The cost of intangible assets acquired in a business combination is their fair value as at the date of acquisition. Following initial recognition, intangible assets are carried at cost less any accumulated amortization and any accumulated impairment losses.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Intangible assets (continued)

The useful lives of intangible assets are assessed to be either finite or indefinite. Intangible assets with finite lives are amortized over the useful economic life. The amortization period and the amortization method for an intangible asset with a finite useful life are reviewed at least at each financial year-end. Changes in the expected useful life or the expected pattern of consumption of future economic benefits embodied in the asset are accounted for by changing the amortization period or method, as appropriate, and treated as changes in accounting estimates. The amortization expense on intangible assets with finite lives is recognized in the separate income statement.

Amortization is calculated using the straight-line method to write down the cost of intangible assets to their residual values over their estimated useful lives as follows:

Key money	lower of lease period or 5 years
Software development cost	2-5 years

Intangible assets with indefinite useful lives are not amortized, but are tested for impairment annually, either individually or at the cash-generating unit level. The assessment of indefinite life is reviewed annually to determine whether the indefinite life continues to be supportable. If not, the change in useful life from indefinite to finite is made on a prospective basis.

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

The Bank does not have intangible assets with an indefinite economic life.

Assets obtained in settlement of debt

The Bank occasionally acquires real estate in settlement of certain loans and advances. Such real estate is stated at the lower of the amount of the related loans and advances and the current fair value of such assets based on the instructions of the Regulatory Authorities.

The Bank accounts for collateral repossessed in accordance with the Central Bank of Lebanon main circular 78 and the Banking Control Commission circulars 173 and 267. Repossessed assets should be sold within two years from the date of approval of repossession by the Banking Control Commission. These are immediately transferred to "Assets obtained in settlement of debt" at their fair value at the repossession date, as approved by the Banking Control Commission.

Upon sale of repossessed assets, any gain or loss realized is recognized in the income statement under "Other operating income" or "Other operating expenses". Gains resulting from the sale of repossessed assets are transferred to "Reserves appropriated for capital increase" in the following financial year. For assets that were not disposed of within the specified period of two years, an amount computed as 5% or 20% of their gross carrying value is transferred to "Reserves appropriated for capital increase" in the following financial year.

Impairment of non-financial assets

The Bank assesses at each reporting date whether there is an indication that an asset may be impaired. If any indication exists, or when annual impairment testing for an asset is required, the Bank estimates the asset's recoverable amount. An asset's recoverable amount is the higher of an asset's or cash-generating unit's fair value less costs to sell and its value in use. Where the carrying amount of an asset or cash-generating unit exceeds its recoverable amount, the asset is considered impaired and is written down to its recoverable amount.

In assessing the value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. In determining fair value less costs to sell, an appropriate valuation model is used. These calculations are corroborated by valuation multiples, quoted share prices for publicly traded subsidiaries or other available fair value indicators.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Impairment of non-financial assets (continued)

For assets excluding goodwill, an assessment is made at each reporting date as to whether there is any indication that previously recognized impairment losses may no longer exist or may have decreased. If such indication exists, the recoverable amount is estimated. A previously recognized impairment loss is reversed only if there has been a change in the assumptions used to determine the asset's recoverable amount since the last impairment loss was recognized. The reversal is limited so that the carrying amount of the asset does not exceed its recoverable amount, nor exceeds the carrying amount that would have been determined, net of depreciation, had no impairment loss been recognized for the asset in prior years. Such reversal is recognized in the separate income statement.

Goodwill is tested for impairment annually and when circumstances indicate that the carrying value may be impaired. Impairment is determined for goodwill by assessing the recoverable amount of each CGU (or group of CGUs) to which the goodwill relates. When the recoverable amount of the CGU is less than its carrying amount, an impairment loss is recognized. Impairment losses relating to goodwill cannot be reversed in future periods.

Provisions for risks and charges

Provisions are recognized when the Bank has a present obligation (legal or constructive) as a result of a past event, and it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. The expense relating to any provision is presented in the separate income statement net of any reimbursement.

The Bank operates in a regulatory and legal environment that, by nature, has a heightened element of litigation risk inherent to its operations. As a result, it is involved in various litigation, arbitration and regulatory investigations and proceedings both in Lebanon and in other jurisdictions, arising in the ordinary course of the Bank's business.

When the Bank can reliably measure the outflow of economic benefits in relation to a specific case and considers such outflows to be probable, the Bank records a provision against the case. Where the probability of outflow is considered to be remote, or probable, but a reliable estimate cannot be made, a contingent liability is disclosed. However, when the Bank is of the opinion that disclosing these estimates on a case-by-case basis would prejudice their outcome, then the Bank does not include detailed, case-specific disclosures in its separate financial statements.

Given the subjectivity and uncertainty of determining the probability and amount of losses, the Bank takes into account a number of factors including legal advice, the stage of the matter and historical evidence from similar incidents.

Employees' retirement benefits obligation

For the Bank and its branches operating in Lebanon, retirement benefits obligation subscriptions paid and due to the National Social Security Fund (NSSF) are calculated on the basis of 8.5% of the staff salaries. The final retirement benefits obligation due to employees after completing 20 years of service, at the retirement age, or if the employee permanently leaves employment, are calculated based on the last salary multiplied by the number of years of service. The Bank is liable to pay to the NSSF the difference between the subscriptions paid and the final retirement benefits obligation due to employees. The Bank provides for retirement benefits obligation on that basis.

Retirement benefits obligation for employees at foreign branches are accrued for in accordance with the laws and regulations of the respective countries in which the branches are located.

Taxes

Taxes are provided for in accordance with the regulations and laws that are effective in the countries where the Bank and its branches operate.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Taxes (continued)

(i) Current tax

Current tax assets and liabilities for the current and prior years are measured at the amount expected to be recovered from or paid to the taxation authorities. The tax rates and tax laws used to compute the amount are those that are enacted or substantively enacted at the reporting date in the countries where the Bank and its branches operate and generate taxable income.

Current income tax relating to items recognised directly in equity is recognised in equity and not in the statement of profit or loss. Management periodically evaluates positions taken in the tax returns with respect to situations in which applicable tax regulations are subject to interpretation and establishes provisions where appropriate.

(ii) Deferred tax

Deferred tax is provided on temporary differences at the reporting date between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes.

Deferred tax liabilities are recognized for all taxable temporary differences, except:

- Where the deferred tax liability arises from the initial recognition of goodwill or of an asset or liability in a transaction that is not a business combination and, at the time of the transaction, affects neither the accounting profit nor taxable profit or loss.
- In respect of taxable temporary differences associated with investments in subsidiaries, where the timing of the reversal of the temporary differences can be controlled and it is probable that the temporary differences will not reverse in the foreseeable future.

Deferred tax assets are recognized for all deductible temporary differences, carry forward of unused tax credits and unused tax losses, to the extent that it is probable that taxable profit will be available against which the deductible temporary differences, and the carry forward of unused tax credits and unused tax losses can be utilized except:

- Where the deferred tax asset relating to the deductible temporary difference arises from the initial recognition of an asset or liability in a transaction that is not a business combination and, at the time of the transaction, affects neither the accounting profit nor taxable profit or loss.
- In respect of deductible temporary differences associated with investments in subsidiaries, deferred tax assets are recognized only to the extent that it is probable that the temporary differences will reverse in the foreseeable future and taxable profit will be available against which the temporary differences can be utilized.

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

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the year when the asset is realized or the liability is settled, based on tax rates (and tax laws) that have been enacted or substantively enacted at the statement of financial position date.

Current tax and deferred tax relating to items recognized directly in other comprehensive income are also recognized in other comprehensive income and not in the separate income statement.

Deferred tax assets and deferred tax liabilities are offset if a legally enforceable right exists to set off current tax assets against current tax liabilities and the deferred taxes relate to the same taxable entity and the same taxation authority.

Tax benefits acquired as part of a business combination, but not satisfying the criteria for separate recognition at that date, are recognised subsequently if new information about facts and circumstances change. The adjustment is either treated as a reduction in goodwill (as long as it does not exceed goodwill) if it was incurred during the measurement period or recognised in profit or loss.

2 ACCOUNTING POLICIES (continued)

2.4 Summary of significant accounting policies (continued)

Treasury shares

Own equity instruments of the Bank which are acquired by it or by any of its subsidiaries (treasury shares) are deducted from equity and accounted for at weighted average cost. Consideration paid or received on the purchase, sale, issue or cancellation of the Bank's own equity instruments is recognized directly in equity. No gain or loss is recognized in the income statement on the purchase, sale, issue or cancellation of the Bank's own equity instruments.

When the Bank holds own equity instruments on behalf of its clients, those holdings are not included in the Bank's statement of financial position.

Dividends on common shares

Dividends on common shares are recognized as a liability and deducted from equity when they are approved by the Bank's shareholders. Interim dividends are deducted from equity when they are declared and no longer at the discretion of the Bank. Dividends for the year that are approved after the reporting date are disclosed as an event after the reporting date.

Assets-held in custody and under administration

The Bank provides custody and administration services that result in the holding or investing of assets on behalf of its clients. Assets under custody or under administration, are not treated as assets of the Bank and accordingly are recorded as off financial position items.

Customers' acceptances

Customers' acceptances represent term documentary credits that the Bank has committed to settle on behalf of its clients against commitments by those clients (acceptances). The commitments resulting from these acceptances are stated as a liability in the statement of financial position for the same amount.

Segment reporting

The Bank's segmental reporting is based on the following operating segments: retail banking, corporate banking, treasury, money and capital markets.

2.5 Significant accounting estimates and judgements

The preparation of the Bank's separate financial statements requires management to make judgements, estimates and assumptions that affect the reported amounts of revenues, expenses, assets and liabilities, and the accompanying disclosures, and the disclosure of contingent liabilities. Uncertainty about these assumptions and estimates could result in outcomes that require a material adjustment to the carrying amount of assets or liabilities affected in future periods.

Judgements

In the process of applying the Bank's accounting policies, management has made the following judgements, apart from those involving estimations, which have the most significant effect in the amounts recognized in the financial statements:

Business model

In determining whether its business model for managing financial assets is to hold assets in order to collect contractual cash flows, the Bank considers:

- Management's stated policies and objectives for the portfolio and the operation of those policies in practice;
- How management evaluates the performance of the portfolio;
- Whether Management's strategy focuses on earning contractual interest revenues;
- The degree of frequency of any expected asset sales;
- The reason for any asset sales; and
- Whether assets that are sold are held for an extended period of time relative to their contractual maturity.

2 ACCOUNTING POLICIES (continued)

2.5 Significant accounting estimates and judgements (continued)

Judgements (continued)

Contractual cash flows of financial assets

The Bank exercises judgements in determining whether the contractual terms of financial assets it originates or acquires give rise on specific dates to cash flows that are solely payments of principal and interest on the principal outstanding and so may qualify for amortized cost measurement. In making the assessment the Bank considers all contractual terms, including any prepayment terms or provisions to extend the maturity of the assets, terms that change the amount and timing of cash flows and whether the contractual terms contain leverage.

Deferred tax assets

Deferred tax assets are recognized in respect of tax losses to the extent that it is probable that taxable profit will be available against which the losses can be utilized. Judgements is required to determine the amount of deferred tax assets that can be recognized, based upon the likely timing and level of future taxable profits, together with future tax planning strategies.

Going concern

Notwithstanding the events and conditions disclosed in note 1, these separate financial statements have been prepared based on the going concern assumption. The Board of Directors believes that they are taking all the measures available to maintain the viability of the Bank and continue its operations in the current business and economic environment.

Impairment of goodwill

Management judgements is required in estimating the future cash flows of the CGUs. These values are sensitive to cash flows projected for the periods for which detailed forecasts are available, and to assumptions regarding the term sustainable pattern of cash flows thereafter. While the acceptable range within which underlying assumptions can be applied is governed by the requirement for resulting forecasts to be compared with actual performance and verifiable economic data in future years, the cash flow forecasts necessarily and appropriately reflect Management's view of future business prospects.

Hedge accounting

The Bank's hedge accounting policies include an element of judgement and estimation, in particular, the existence of highly probable cash flows for inclusion within the macro cash flow hedge. Estimates of future interest rates and the general economic environment will influence the availability and timing of suitable hedged items, with an impact on the effectiveness of the hedge relationships. Details of the Bank's hedge accounting policies and the sensitivities most relevant to risks are disclosed in notes.

Determining the lease term of contracts with renewal and termination options

The Bank determines the lease term as the non-cancellable term of the lease, together with any periods covered by an option to extend the lease if it is reasonably certain to be exercised, or any periods covered by an option to terminate the lease, if it is reasonably certain not to be exercised. The Bank has several lease contracts that include extension and termination options. The Bank applies judgement in evaluating whether it is reasonably certain whether or not to exercise the option to renew or terminate the lease. That is, it considers all relevant factors that create an economic incentive for it to exercise either the renewal or termination. After the commencement date, the Bank reassesses the lease term if there is a significant event or change in circumstances that is within its control and affects its ability to exercise or not to exercise the option to renew or to terminate (e.g., a change in business strategy).

The Bank included the renewal period as part of the lease term for leases of head office and branches due to the significance of these assets to its operations. These leases have a short non-cancellable period (i.e., three to five years) and there will be a significant negative effect on the Bank's operations if a replacement is not readily available. The renewal options for leases of motor vehicles (or other assets) were not included as part of the lease term because the Bank has a policy of leasing motor vehicles (or other assets) for not more than five years and, hence, not exercising any renewal options. Furthermore, the periods covered by termination options are included as part of the lease term only when they are reasonably certain not to be exercised.

2 ACCOUNTING POLICIES (continued)

2.5 Significant accounting estimates and judgements (continued)

Estimates and assumptions

The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting date, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year, are described below. The Bank based its assumptions and estimates on parameters available when the separate financial statements were prepared. Existing circumstances and assumptions about future developments, however, may change due to market changes or circumstances arising beyond the control of the Bank. Such changes are reflected in the assumptions when they occur.

Fair value of financial instruments

Where the fair values of financial assets and financial liabilities recorded on the statement of financial position cannot be derived from active markets, they are determined using a variety of valuation techniques that include the use of mathematical models. The input to these models are derived from observable market data where possible, but where observable market data is not available, estimation is required to establish fair values. The judgements and estimates include considerations of liquidity and model inputs such as credit risk (both own and counterparty) funding value adjustments, correlation and volatility.

Impairment losses on financial instruments

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

- The Bank's internal credit grading model;
- The Bank's criteria for assessing if there has been a significant increase in credit risk;
- The segmentation of financial assets when their ECL is assessed on a collective basis;
- Development of ECL models, including the various formulas and the choice of inputs;
- Determination of associations between macroeconomic scenarios and, economic inputs and their impact on ECL calculation; and
- Selection of forward-looking macroeconomic scenarios and their probability of occurrence, to derive the ECL models.

It has been the Bank's policy to regularly review its models in the context of actual loss experience and adjust when necessary.

During 2021, the key areas that involved a higher degree of judgment and where significant assumptions were made in the estimation of expected credit losses are described in note 1.

Impairment of non-financial assets

Impairment exists when the carrying value of an asset or cash-generating unit exceeds its recoverable amount, which is the higher of its fair value less costs of disposal and its value in use. The fair value less costs of disposal calculation is based on available data from binding sales transactions, conducted at arm's length, for similar assets or observable market prices less incremental costs for disposing of the asset. The value in use calculation is based on a DCF model. The cash flows are derived from the budget for the next five years and do not include restructuring activities that the Bank is not yet committed to or significant future investments that will enhance the asset's performance of the CGU being tested. The recoverable amount is sensitive to the discount rate used for the DCF model, as well as the expected future cash inflows and the growth rate used for extrapolation purposes. These estimates are most relevant to goodwill and other intangibles with indefinite useful lives recognized by the Bank.

3 SEGMENT REPORTING

Management monitors the operating results of its business units separately for the purpose of making decisions about resource allocation and performance assessment. Segments are evaluated based on information relating to net operating income and financial position. Income taxes and operating expenses are managed on a group basis and are not allocated to operating segments.

Interest income is reported net, since Management monitors net interest income as a performance measure and not the gross income and expense amounts. Net interest income is allocated to the business segment based on the assumption that all positions are funded or invested via a central funding unit. An internal Funds Transfer Pricing (FTP) mechanism was implemented between operating segments. Transfer prices between operating segments are on an arm's length basis in a manner similar to transactions with third parties.

The assets and liabilities that are reported in the segments are net from inter-segments' assets and liabilities since they constitute the basis of Management's measures of the segments' assets and liabilities and the basis of the allocation of resources between segments.

A) Business segments

The Bank operates in four major business segments: retail, corporate, treasury and asset management and private banking.

Retail banking provides a diversified range of products and services to meet the personal banking and consumer finance needs of individuals. The range includes deposits, housing loans, consumer loans, credit cards, fund transfers, foreign exchange and other branch related services.

Corporate banking provides a comprehensive product and service offering to corporate and institutional customers, including loans and other credit facilities, deposits and current accounts, trade finance and foreign exchange operations.

Treasury, money and capital markets provides Treasury services including transactions in money and capital markets for the Bank's customers, manages investment and trading transactions (locally and internationally), and manages liquidity and market risks. This segment also offers Investment Banking and brokerage services, and manages the Bank's own portfolio of stocks, bonds, and other financial instruments.

The following tables present net operating income information and financial position information in respect of the Bank's reportable segments.

i) Net operating income information

	2021			
	<i>Treasury, money and capital markets</i> LL million	<i>Corporate banking</i> LL million	<i>Retail banking</i> LL million	<i>Total</i> LL million
Net interest income	1,974,646	56,632	126,387	2,157,665
Net fee and commission (expense) income	(286,901)	(48,489)	42,831	(292,559)
Net loss from financial assets at fair value through profit or loss	721	-	(786,491)	(785,770)
Net loss from derecognition of financial assets at amortized cost	(107)	-	-	(107)
Share of profit of subsidiaries	32,689	-	-	32,689
Other operating income	-	-	27,824	27,824
Net impairment loss on financial assets	(669,132)	61,267	(70,501)	(678,366)
Discounts on loans	-	(11,042)	(32,943)	(43,985)
Net operating income	1,051,916	58,368	(692,893)	417,391

3 SEGMENT REPORTING (continued)

A) Business segments (continued)

i) Net operating income information (continued)

	2020			
	Treasury, money and capital markets LL million	Corporate banking LL million	Retail banking LL million	Total LL million
Net interest income	1,462,377	71,059	132,135	1,665,571
Net fee and commission income	38,953	12,570	30,985	82,508
Net loss from financial assets at fair value through profit or loss	(87,064)	-	(34,403)	(121,467)
Net loss from derecognition of financial assets at amortized cost	(73,387)	-	-	(73,387)
Share of profit of subsidiaries	84,198	-	-	84,198
Other operating income	-	-	7,141	7,141
Net impairment loss on financial assets	(833,591)	(48,454)	(196,773)	(1,078,818)
Discounts on loans	-	(27,930)	(30,500)	(58,430)
Net operating income	591,486	7,245	(91,415)	507,316

ii) Financial position information

	2021					
	Treasury, money and capital markets LL million	Corporate banking LL million	Retail banking LL million	Investments in subsidiaries LL million	Other ¹ LL million	Total LL million
Total assets	31,792,490	679,948	1,672,917	1,104,333	630,357	35,880,045
Total liabilities	28,414,452	607,702	1,495,165	-	838,831	31,356,150

	2020					
	Treasury, money and capital markets LL million	Corporate banking LL million	Retail banking LL million	Investments in subsidiaries LL million	Other ¹ LL million	Total LL million
Total assets	31,336,288	1,002,013	2,583,784	1,611,312	648,082	37,181,479
Total liabilities	28,603,921	914,643	2,358,491	-	704,279	32,581,334

¹ Other includes certain activities related to assets obtained in settlement of debt, property, equipment and right-of-use assets, intangible assets and other assets.

Interest and similar income from exposure to the Central Bank of Lebanon and Lebanese sovereign amounted to LL 2,537,818 million for the year ended 31 December 2021 (2020: LL 2,844,740 million) arising from time deposits with the Central Bank of Lebanon and financial instruments held by the Bank. The breakdown of interest and similar income from exposure to the Central Bank of Lebanon and Lebanese sovereign is as follows:

	2021 LL million	2020 LL million
Interest and similar income		
Central Bank of Lebanon (note 4)	2,353,181	2,653,787
Lebanese sovereign (notes 4 and 7)	184,637	190,953
	<u>2,537,818</u>	<u>2,844,740</u>

3 SEGMENT REPORTING (continued)

B) Geographical segments

The Bank operates in two geographical markets based on the location of its markets and customers. The local market represents the Lebanese market, and the international market represents markets outside Lebanon. The following table shows the distribution of the Bank's net operating income and non-current assets.

	2021		
	<i>Domestic LL million</i>	<i>International LL million</i>	<i>Total LL million</i>
Total operating income	1,085,601	54,141	1,139,742
Net impairment loss on financial assets	(656,789)	(21,577)	(678,366)
Discounts on loans	(43,985)	-	(43,985)
Net operating income²	384,827	32,564	417,391
Non-current assets³	1,214,711	488,070	1,702,781
	2020		
	<i>Domestic LL million</i>	<i>International LL million</i>	<i>Total LL million</i>
Total operating income	1,629,060	15,504	1,644,564
Net impairment (loss) gain on financial assets	(1,087,857)	9,039	(1,078,818)
Discounts on loans	(54,555)	(3,875)	(58,430)
Net operating income²	486,648	20,668	507,316
Non-current assets³	1,023,517	1,205,186	2,228,703

² Net operating income is attributed to the geographical segment on the basis of the location where the income is generated.

³ Non-current assets consist of investments in subsidiaries, property, equipment and right-of-use assets, intangible assets, and assets obtained in settlement of debt.

4 INTEREST AND SIMILAR INCOME

	2021	2020
	<i>LL million</i>	<i>LL million</i>
Balances with central banks (a)	2,237,929	2,538,479
Due from banks and financial institutions	793	5,933
Due from sister banks	130	708
Loans and advances to customers at amortized cost	207,283	331,752
Loans and advances to related parties at amortized cost	485	582
Financial assets at amortized cost (b)	324,560	330,819
Less: tax on interest income (c)	(254,355)	(285,008)
	2,516,825	2,923,265

(a) Included under interest and similar income from balances with central banks, an amount of LL 2,237,580 million (2020: LL 2,538,178 million) from balances with the Central Bank of Lebanon.

(b) Included under interest and similar income from financial assets at amortized cost, an amount of LL 115,601 million and LL 184,616 million (2020: LL 115,609 million and LL 188,026 million) from Lebanese government certificate of deposits and Lebanese treasury bills respectively.

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4 INTEREST AND SIMILAR INCOME (continued)

(c) Tax on interest income for the years ended 31 December 2021 and 2020 are as follows:

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Balances with central banks	224,098	254,402
Due from banks and financial institutions	-	5
Due from sister banks	7	25
Loans and advances to customers at amortized cost	-	1
Financial assets at amortized cost	30,250	30,575
	<u>254,355</u>	<u>285,008</u>

5 INTEREST AND SIMILAR EXPENSE

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Due to central banks	162,831	377,392
Due to banks and financial institutions	2,850	7,646
Due to sister banks	1,285	5,135
Customers' deposits at amortized cost	172,598	811,959
Deposits from related parties at amortized cost	16,511	24,097
Debt issued and other borrowed funds	2,827	31,167
Lease liabilities	258	298
	<u>359,160</u>	<u>1,257,694</u>

6 NET FEE AND COMMISSION (EXPENSE) INCOME

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Fee and commission income		
General banking income	42,697	44,819
Credit-related fees and commissions	19,408	17,931
Trade finance	3,371	3,685
Brokerage and custody income	92	99
Electronic banking	39,151	31,414
Trust and fiduciary activities	12	12
Other fees and commissions	4,491	5,343
	<u>109,222</u>	<u>103,303</u>
Fee and commission expense		
Mark-up commission (*)	(380,211)	-
General banking expenses	(6,426)	(5,977)
Credit-related fees and commissions	(22)	(41)
Electronic banking	(14,608)	(14,281)
Other fees and commissions	(514)	(496)
	<u>(401,781)</u>	<u>(20,795)</u>
	<u>(292,559)</u>	<u>82,508</u>

6 NET FEE AND COMMISSION (EXPENSE) INCOME (continued)

(*) During 2021, the Bank introduced the “multiplier factor” which entails inciting depositors of foreign currency international liquidity, cash deposited or incoming border transfers to convert these funds into local foreign currency deposits after the application of multiplier factors. Book losses from these transactions amounted to LL 332,071 million for the year ended 31 December 2021. In addition, included under mark-up commission for the year ended 31 December 2021, an amount of LL 48,140 million paid as a premium for banknotes shortages.

7 NET LOSS FROM FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT OR LOSS

	<i>2021</i>	<i>2020</i>
	<i>LL million</i>	<i>LL million</i>
Interest and similar income from debt instruments and other financial assets at fair value through profit or loss:		
- Corporate debt securities	803	-
- Funds	467	514
- Government debt securities	21	2,927
	<u>1,291</u>	<u>3,441</u>
Net gain (loss) from sale of debt instruments and other financial assets at fair value through profit or loss:		
- Corporate debt securities	30	-
- Government debt securities	-	(67,243)
	<u>30</u>	<u>(67,243)</u>
Net unrealized loss from revaluation of debt instruments and other financial assets at fair value through profit or loss:		
- Corporate debt securities	(1,719)	-
- Government debt securities	(17)	(408)
- Funds	532	(2,862)
	<u>(1,204)</u>	<u>(3,270)</u>
Net gain (loss) from debt instruments and other financial assets at fair value through profit or loss	117	(67,072)
Net gain from equity instruments at fair value through profit or loss:		
- Realized (loss) gain from sale	(813)	934
- Unrealized gain from revaluation	1,410	572
- Dividend income	6	64
	<u>603</u>	<u>1,570</u>
Foreign exchange loss	(786,490)	(55,965)
	<u>(785,770)</u>	<u>(121,467)</u>

Foreign exchange loss includes gains and losses from spot and forward contracts, other currency derivatives and the revaluation of the daily open trading position.

8 NET LOSS FROM DERECOGNITION OF FINANCIAL ASSETS AT AMORTIZED COST

The Bank derecognizes some debt instruments classified at amortized cost due to the following reasons:

- Deterioration of the credit rating below the ceiling allowed in the Bank's investment policy;
- Liquidity gap and yield management;
- Exchange of financial assets by the Central Bank of Lebanon;
- Currency risk management as a result of change in the currency base of deposits; or
- Liquidity for capital expenditures.

The schedule below details the gains and losses arising from derecognition of these financial assets:

	2021		
	<i>Gains</i> <i>LL million</i>	<i>(Losses)</i> <i>LL million</i>	<i>Net</i> <i>LL million</i>
Lebanese sovereign and Central Bank of Lebanon			
Placements with the Central Bank of Lebanon	-	(107)	(107)
	-----	-----	-----
	2020		
	<i>Gains</i> <i>LL million</i>	<i>(Losses)</i> <i>LL million</i>	<i>Net</i> <i>LL million</i>
Lebanese sovereign and Central Bank of Lebanon			
Placements with the Central Bank of Lebanon	-	(70,993)	(70,993)
Certificates of deposits	-	(780)	(780)
	-----	-----	-----
	-	(71,773)	(71,773)
Other sovereign			
Treasury bills	534	(2,148)	(1,614)
	-----	-----	-----
	534	(73,921)	(73,387)
	-----	-----	-----

9 OTHER OPERATING INCOME

	2021 <i>LL million</i>	2020 <i>LL million</i>
Release of provisions for risks and charges	2,835	-
Recoveries of provisions for risks and charges	371	849
Other operating income (*)	24,618	6,292
	-----	-----
	27,824	7,141
	-----	-----

(*) Other operating income corresponds mainly to income generated from fiscal stamps.

10 NET IMPAIRMENT LOSS ON FINANCIAL ASSETS

	<i>2021</i>	<i>2020</i>
	<i>LL million</i>	<i>LL million</i>
<i>Re-measurements:</i>		
Balances with Central Bank of Lebanon	669,165	836,269
Banks and financial institutions	34	-
Loans and advances to customers at amortized cost- Commercial loans	94,183	298,013
Loans and advances to customers at amortized cost- Consumer loans	215,622	219,695
Loans and advances to related parties at amortized cost	11	2
Financial assets at amortized cost	-	1
Financial guarantees and other commitments	-	1,653
	<u>979,015</u>	<u>1,355,633</u>
<i>Recoveries:</i>		
Loans and advances to customers at amortized cost- Commercial loans	(142,004)	(242,076)
Loans and advances to customers at amortized cost- Consumer loans	(145,135)	(22,923)
Financial assets at amortized cost	(44)	(2,678)
Subordinated loans (note 21)	(22)	-
Financial guarantees and other commitments	(629)	(706)
	<u>(287,834)</u>	<u>(268,383)</u>
Recoveries of debts previously written off	<u>(12,815)</u>	<u>(8,432)</u>
	<u>678,366</u>	<u>1,078,818</u>

11 PERSONNEL EXPENSES

	<i>2021</i>	<i>2020</i>
	<i>LL million</i>	<i>LL million</i>
Wages and salaries	90,863	97,849
Social security contributions	17,933	17,625
Retirement benefits obligation (note 32)	6,638	(11,640)
Additional allowances paid	34,908	29,786
Bonuses	27,132	21,897
	<u>177,474</u>	<u>155,517</u>

12 OTHER OPERATING EXPENSES

	<i>2021</i>	<i>2020</i>
	<i>LL million</i>	<i>LL million</i>
Maintenance and repairs	27,305	16,380
Professional fees	21,649	14,047
Electricity and fuel	16,121	2,792
Fee for guarantee of deposits	11,706	13,709
Stationary and printings	10,500	3,388
Rent and related charges under operating leases	9,529	4,590
Marketing and advertising	8,842	7,389
Insurance	5,659	4,888
Postage and telecommunications	4,797	4,811
Taxes and fees	2,838	3,517
Board of Directors' attendance fees	2,661	1,397
Fiscal stamps	771	981
Travel expenses	94	148
Entertainment expenses	36	30
Provisions for risks and charges (note 24)	-	421
Others (*)	22,055	26,315
	<u>144,563</u>	<u>104,803</u>

(*) "Others" includes mainly custody fees, guarding expenses, gifts and donations, money transfer expenses, and provision for litigations and claims.

13 INCOME TAX

Income tax expense for the years ended 31 December 2021 and 2020 was as follows:

	<i>2021</i>	<i>2020</i>
	<i>LL million</i>	<i>LL million</i>
Current tax		
Income tax expense – other operating results	234,613	165,754
Other taxes treated as income tax (*)	-	75,000
Income tax expense	<u>234,613</u>	<u>240,754</u>

(*) During 2020, other taxes treated as income tax include an amount of LL 75,000 million representing 2% on 2019 turnover as per Article No 20 of the Budget Law 6/2020.

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13 INCOME TAX (continued)

Reconciliation of the total tax charge

A reconciliation between the tax expense and the accounting profit for the years ended 31 December 2021 and 2020 is as follows:

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Accounting profit before income tax	206,695	225,873
Add:		
Provisions non tax deductible	873,832	870,487
Other non-tax deductible charges	394,615	66,857
	<u>1,475,142</u>	<u>1,163,217</u>
Less:		
Income received and previously subject to income tax	(6)	(21)
Provisions previously subject to income tax	(100,206)	(145,794)
Unrealized gain from revaluation of financial assets at FVTPL	(39,139)	(247,725)
Remunerations previously subject to income tax	(23,000)	(24,624)
Net gain on disposal of fixed assets	(134,086)	(3,915)
Non - taxable income	(2,319)	(3,099)
Other deductions	-	(25,871)
Other taxes treated as income tax	-	(75,000)
Taxable profit	<u>1,176,386</u>	<u>637,168</u>
Income tax expense in the income statement	<u>234,613</u>	<u>165,754</u>

14 CASH AND BALANCES WITH CENTRAL BANKS

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Cash on hand	934,906	226,449
Central Bank of Lebanon		
Current accounts	1,426,372	149,081
Time deposits (*)	24,612,505	26,068,101
Accrued interest	498,843	482,780
	<u>26,537,720</u>	<u>26,699,962</u>

14 CASH AND BALANCES WITH CENTRAL BANKS (continued)

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
<i>Other central banks</i>		
Current accounts	72,515	83,937
Time deposits	138,852	79,415
	<u>211,367</u>	<u>163,352</u>
	<u>27,683,993</u>	<u>27,089,763</u>
Less: Allowance for expected credit losses (note 45)	(1,885,897)	(1,218,365)
	<u>25,798,096</u>	<u>25,871,398</u>

(*) At 31 December 2021, time deposits with the Central Bank of Lebanon amounting to LL 5,370,819 million and maturing in 2028 and 2029 were blocked against term borrowings granted by the Central bank of Lebanon with the same value and maturing in 2028 and 2029 (2020: LL 5,723,853 maturing in 2028 and 2029) (note 26). During 2019, the Bank and the Central Bank of Lebanon signed a netting agreement for specified financial assets and liabilities that qualifies for netting under the requirements of IAS 32. Accordingly, as at 31 December 2021, time deposits with the Central Bank of Lebanon amounting to LL 5,370,819 million (2020: LL 5,723,853 million) and term borrowings from the Central Bank of Lebanon (note 26) are reported on a net basis on the statement of financial position. During 2021, financial assets and financial liabilities that were settled on a net basis amounted to LL 353,034 million (2020: LL 1,655,388 million) (note 26).

Obligatory reserves:

Cash and balances with Central Banks include non-interest bearing balances held by the Bank at the Central Bank of Lebanon in coverage of the obligatory reserve requirements for all banks operating in Lebanon on deposits in Lebanese Lira as required by the Lebanese banking rules and regulations. This obligatory reserve is calculated on the basis of 25% of sight commitments and 15% of term commitments after taking into account certain waivers relating to subsidized loans denominated in Lebanese Lira. Accordingly, the obligatory reserve amounted to LL 193,737 million at 31 December 2021 (2020: LL 39,395 million).

In addition to the above, all banks operating in Lebanon are required to deposit with the Central Bank of Lebanon interest-bearing placements at the rate of 15% of total deposits in foreign currencies regardless of nature. These placements amounted to US\$ 2,062,721 thousands (equivalent to LL 3,110 billion) as at 31 December 2021 (2020: US\$ 2,331,042 thousands equivalent to LL 3,514 billion).

Foreign branches are also subject to obligatory reserve requirements with varying percentages, according to the banking rules and regulations of the countries in which they are located. Balances of foreign branches available against obligatory reserves amounted to LL 41,793 million and LL 43,496 million as at 31 December 2021 and 31 December 2020, respectively.

15 DUE FROM BANKS AND FINANCIAL INSTITUTIONS

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Current accounts	240,478	319,777
Time deposits	436,693	37,315
	<u>677,171</u>	<u>357,092</u>
Less: Allowance for expected credit losses	(34)	-
	<u>677,137</u>	<u>357,092</u>

16 DUE FROM SISTER BANKS

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Current accounts	17,780	40,079
Time deposits	251	3,106
	<u>18,031</u>	<u>43,185</u>

17 DERIVATIVE FINANCIAL INSTRUMENTS

The Bank enters into derivatives for trading and for risk management purposes. The table below shows the fair values of derivative financial instruments, recorded as assets or liabilities, together with their notional amounts. The notional amount, recorded gross, is the quantity of a derivative contracts' underlying instrument (being a reference rate or index) and is the basis upon which changes in the value of derivatives are measured. The notional amounts indicate the volume of transactions outstanding at year-end and are indicative of neither the market risk nor the credit risk.

Forwards and Futures

Forwards and futures contracts are contractual agreements to buy or sell a specified financial instrument at a specific price and date in the future. Forwards are customized contracts transacted in the over-the-counter market. Futures contracts are transacted in standardized amounts on regulated exchanges and are subject to daily cash margin requirements.

Options

Options are contractual agreements that convey the right, but not the obligation, for the purchaser either to buy or to sell a specific amount of a financial instrument at a fixed price, either at a fixed future date or at any time within a specified period.

The Bank purchases and sells options through regulated exchanges and in the over-the-counter markets. Options purchased by the Bank provide the Bank with the opportunity to purchase (call options) or sell (put options) the underlying asset at an agreed-upon value either on or before the expiration of the option. The Bank is exposed to credit risk on purchased options only to the extent of their carrying amount, which is their fair value.

17 DERIVATIVE FINANCIAL INSTRUMENTS (continued)

Swaps

Swaps are contractual agreements between two parties to exchange streams of payments over time based on specified notional amounts, in relation to movements in a specified underlying index such as an interest rate, foreign currency rate, commodity index or equity index.

Interest rate swaps relate to contracts taken out by the Bank with other counterparties (customers and financial institutions) in which the Bank either receives or pays a floating rate of interest, respectively, in return for paying or receiving a fixed rate of interest. The payment flows are usually netted against each other, with the difference being paid by one party to the other.

The Bank has positions in the following types of derivatives:

	2021			2020		
	Assets LL million	Liabilities LL million	Total notional amount LL million	Assets L.L. million	Liabilities L.L. million	Total notional amount L.L. million
Derivatives held for trading						
Forward foreign exchange contracts	1,356	1,366	3,295	2	11	489
Interest rate swaps	-	-	-	-	-	36,180
	1,356	1,366	3,295	2	11	36,669

Derivatives often involve at their inception only a mutual exchange of promises with little or no transfer of consideration. However, these instruments frequently involve a high degree of leverage and are very volatile. A relatively small movement in the value of the asset, rate or index underlying a derivative contract may have a significant impact on the profit or loss of the Bank.

Over-the-counter derivatives may expose the Bank to the risks associated with the absence of an exchange market on which to close out an open position.

The Bank's exposure under derivative contracts is closely monitored as part of the overall management of the Bank's market risk.

Derivative financial instruments held-for-trading purposes

Most of the Bank's derivative trading activities relate to deals with customers which are normally offset by transactions with other counterparties. Also included under this heading are any derivatives entered into for risk management purposes which do not meet the IFRS 9 hedge accounting criteria.

Derivative financial instruments held for hedging purposes

As part of its asset and liability management, the Bank uses derivatives for hedging purposes in order to reduce its exposure to currency risk. The Bank uses forward foreign exchange contracts to hedge against specifically identified currency risks.

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18 FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT OR LOSS

	2021 <i>LL million</i>	2020 <i>LL million</i>
<i>Lebanese sovereign and Central Bank of Lebanon</i>		
Treasury bills and bonds	453	470
<i>Private sector and other securities</i>		
Corporate debt instruments	211,501	3,070
Equity instruments	24,662	27,420
Funds	39,683	40,293
	<u>275,846</u>	<u>70,783</u>
	<u>276,299</u>	<u>71,253</u>

19 NET LOANS AND ADVANCES TO CUSTOMERS AT AMORTIZED COST

	2021 <i>LL million</i>	2020 <i>LL million</i>
Commercial loans (*)	1,140,605	1,492,903
Consumer loans	2,035,514	2,942,303
	<u>3,176,119</u>	<u>4,435,206</u>
Less: Allowance for expected credit losses (note 45)	(829,097)	(857,322)
	<u>2,347,022</u>	<u>3,577,884</u>

(*) Included under commercial loans as at 31 December 2021, an amount of LL 492,149 million (2020: LL 487,236 million) representing SME loans.

In accordance with the Banking Control Commission Circular No. 240, bad loans and related provisions and unrealized interest which fulfill certain requirements have been transferred to off financial position accounts. The gross balance of these loans amounted to LL 1,043,630 million as of 31 December 2021 (2020: LL 910,555 million).

The fair value of collateral that the Bank holds relating to loans and advances to corporate customers determined to be impaired individually as at 31 December 2021 amounts to LL 544,283 million (2020: LL 508,429 million). The collateral consists of cash, securities, letters of guarantees and properties.

The Bank provided discounts to customers who settled of loans and advances. Gross balances subject to discounts amounted to LL 544,283 million for commercial loans and LL 508,429 million for retail loans (2020: LL 109,901 million and LL 59,327 million respectively). Discounts amounting to LL 43,985 million, out of which LL 11,042 million for commercial loans and LL 32,943 million for retail loans, were recognized in the separate income statement for the year ending 31 December 2021 (2020: LL 58,430 million, out of which LL 27,929 million for commercial loans and LL 30,501 million for retail loans).

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20 FINANCIAL ASSETS AT AMORTIZED COST

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Lebanese sovereign and Central Bank of Lebanon		
Treasury bills and bonds (*)	2,643,902	2,775,054
Certificates of deposits	1,815,187	1,815,182
	<u>4,459,089</u>	<u>4,590,236</u>
Other sovereign		
Treasury bills and bonds	499,953	390,595
	<u>499,953</u>	<u>390,595</u>
Private sector and other securities		
Corporate debt instruments	98,359	48,897
	<u>98,359</u>	<u>48,897</u>
Less: Allowance for expected credit losses (note 45)	(39,069)	(39,580)
	<u>5,018,332</u>	<u>4,990,148</u>

(*) As at 31 December 2021, Lebanese treasury bills amounting to LL 2,321,271 million with maturities ranging between 2022 and 2033 were pledged against term borrowing granted from the Central Bank of Lebanon with the same value (2020: LL 2,321,271 million maturing between 2022 and 2033) (note 26).

21 INVESTMENTS IN SUBSIDIARIES

	<i>Country of origin</i>	<i>Activity</i>	<i>Contribution's share</i>		<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
			<i>2021</i> <i>%</i>	<i>2020</i> <i>%</i>		
BANQUE BANORIENT France SA	France	Banking	99.99	99.99	516,063	554,089
BLOMInvest Bank SAL	Lebanon	Banking	99.92	99.92	238,236	232,366
Arope Insurance SAL	Lebanon	Insurance	89.05	89.05	192,577	190,551
BLOM Bank Qatar LLC	Qatar	Banking	99.75	99.75	68,703	67,462
BLOM Development Bank SAL	Lebanon	Islamic Banking	99.90	33.32	27,625	27,610
BLOM Asset Management Company SAL	Lebanon	Investment activities	99.99	99.99	13,817	13,712
BLOMInvest – Saudi Arabia	Saudi Arabia	Financial Institution	59.96	10.00	14,866	13,567
BLOM Securities	Jordan	Financial Institution	100	100.00	11,287	12,280
BLOM SPV Ltd	Cayman Island	Investment activities	100	100.00	75	75
BLOM Bank Egypt SAE	Egypt	Banking	-	99.42	-	466,476
					<u>1,083,249</u>	<u>1,578,188</u>
Subordinated loans:						
BLOMInvest Bank SAL					9,045	18,090
BLOM Bank Qatar LLC					12,060	15,075
Accrued interest					2	4
					<u>21,107</u>	<u>33,169</u>
Less: Allowance for expected credit losses					(23)	(45)
					<u>1,104,333</u>	<u>1,611,312</u>

BLOM Bank SAL

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21 INVESTMENTS IN SUBSIDIARIES (continued)

Financial information of the Bank's subsidiaries

	2021						
	<i>BLOM Bank France SA</i> LL million	<i>BLOM Bank Egypt SAE</i> LL million	<i>BLOMinvest Bank SAL</i> LL million	<i>Arope Insurance SAL</i> LL million	<i>BLOM Bank Qatar LLC</i> LL million	<i>Others</i> LL million	<i>Total</i> LL million
Total assets	4,180,430	-	348,236	629,236	100,280	529,028	5,787,210
Total liabilities	3,640,215	-	90,336	385,619	31,660	270,121	4,417,951
Net assets	540,215	-	257,900	243,617	68,620	258,907	1,369,259
Bank's share of net assets	516,063	-	238,236	192,577	68,703	67,670	1,083,249
Total operating income	74,645	-	12,077	37,708	6,880	41,688	172,998
Profit for the year	8,183	-	3,596	-	1,244	12,246	25,269
Bank's share of profit for the year	8,216	16,694	2,941	-	1,241	3,597	32,689

	2020						
	<i>BLOM Bank France SA</i> LL million	<i>BLOM Bank Egypt SAE</i> LL million	<i>BLOMinvest Bank SAL</i> LL million	<i>Arope Insurance SAL</i> LL million	<i>BLOM Bank Qatar LLC</i> LL million	<i>Others</i> LL million	<i>Total</i> LL million
Total assets	4,137,538	4,210,584	413,391	689,090	108,550	248,392	9,807,545
Total liabilities	3,583,412	3,741,383	160,080	445,472	41,174	49,889	8,021,410
Net assets	554,126	469,201	253,311	243,618	67,376	198,503	1,786,135
Bank's share of net assets	554,089	466,476	232,366	190,551	67,462	67,244	1,578,188
Total operating income	74,262	174,786	16,594	58,534	6,383	26,554	357,113
Profit for the year	10,572	63,938	4,101	-	2,084	7,332	88,027
Bank's share of profit for the year	10,571	63,568	3,688	-	2,079	4,292	84,198

BLOM Bank France SA

During 2020, BLOM Bank France SA distributed dividends to BLOM Bank SAL for the value of EUR 94.5 million (equivalent to LL 157,328 million).

BLOMINVEST Saudi Arabia

During 2021, BLOMINVEST Saudi Arabia distributed dividends to BLOM Bank SAL for the value of US\$ 310,333 (equivalent to LL 468 million) (2020: US\$ 310,248 equivalent to LL 468 million).

BLOM Securities

During 2021, BLOM Securities distributed dividends to BLOM Bank SAL for the value of US\$ 840,070 (equivalent to LL 1,266 million).

BLOM Bank SAL

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21 INVESTMENTS IN SUBSIDIARIES (continued)

BLOM Invest Bank SAL

The Bank has entered into a subordinated loan agreement dated 20 September 2016 with BLOM Invest Bank SAL for US\$ 30 million (equivalent to LL 45,225 million). The subordinated loan has a final maturity date of 13 December 2022 and carries an interest rate of 3-month LIBOR +0.25% payable quarterly. After a grace period of 1 year, the principal is to be paid in 5 equal annual payments of US\$ 6 million (LL 9,045 million) each. During the year 2021, BLOM Invest Bank SAL settled its fourth principal payment of LL 9,045 million (2020: the same).

BLOM Bank Qatar LLC

The Bank has entered into a subordinated loan agreement dated 29 September 2010 with BLOM Bank Qatar LLC for US\$ 10,000,000 (equivalent to LL 15,075 million). The subordinated loan forms part of the subsidiary capital resources in compliance with applicable QFC regulations. The subordinated loan has a final maturity date of 30 September 2015 and carries an interest rate of 3-month LIBOR payable quarterly. On 23 January 2015, an addendum to the subordinated loan agreement was signed between the Bank and BLOM Bank Qatar LLC to extend the maturity of the balance amounting to US\$ 10,000,000 (equivalent to LL 15,075 million) to 31 December 2020. On 28 December 2017, another addendum was signed to extend the maturity of the subordinated loan to 31 December 2022.

BLOM Bank Egypt SAL

BLOM Bank SAL has signed a definitive agreement on 15 January 2021 with the Arab Banking Corporation BSC (Bank ABC), whereby BLOM Bank SAL will sell its entire 99.4% stake in BLOM Bank Egypt SAE, its Egyptian subsidiary, to Bank ABC for a total consideration of EGP 6,700 million (equivalent to LL 644 billion), subject to obtaining the approvals of the Central Bank of Egypt and the Central Bank of Lebanon, among other regulatory approvals in Egypt and Bahrain. The Bank obtained the required approvals during 2021 and the closing of the transaction took place during 2021. Net profit from the sale amounted to LL 134,157 million recorded under profit from sale of a subsidiary in the separate income statement for the year ended 31 December 2021.

22 PROPERTY, EQUIPMENT AND RIGHT-OF-USE ASSETS

	<i>Freehold land and buildings</i> LL million	<i>Vehicles</i> LL million	<i>Furniture, office installations and computer equipment</i> LL million	<i>Advances on acquisition of property and equipment in progress</i> LL million	<i>Right-of- use assets</i> LL million	<i>Total</i> LL million
Cost						
At 1 January 2021	461,133	4,505	307,973	92,556	3,033	869,200
Additions	412	-	4,569	3,672	325	8,978
Disposals	-	(477)	(2,389)	-	-	(2,866)
Write-offs	-	-	(351)	-	-	(351)
Lease termination	-	-	-	-	(292)	(292)
Transfers	2,380	-	3,415	(5,795)	-	-
At 31 December 2021	463,925	4,028	313,217	90,433	3,066	874,669
Depreciation						
At 1 January 2021	82,076	3,277	217,625	-	941	303,919
Charge for the year	7,531	641	13,666	-	433	22,271
Relating to disposals	-	(420)	(2,356)	-	-	(2,776)
Relating to write-offs	-	-	(209)	-	-	(209)
Relating to lease termination	-	-	-	-	(292)	(292)
Foreign exchange difference	-	-	(196)	-	-	(196)
At 31 December 2021	89,607	3,498	228,530	-	1,082	322,717
Net carrying value						
At 31 December 2021	374,318	530	84,687	90,433	1,984	551,952

22 PROPERTY, EQUIPMENT AND RIGHT-OF-USE ASSETS (continued)

	<i>Freehold land and buildings LL million</i>	<i>Vehicles LL million</i>	<i>Furniture, office installations and computer equipment LL million</i>	<i>Advances on acquisition of property and equipment in progress LL million</i>	<i>Right-of-use assets LL million</i>	<i>Total LL million</i>
Cost						
At 1 January 2020	464,283	5,362	297,739	95,553	3,031	865,968
Additions	699	-	4,922	4,836	-	10,457
Disposals	(2,277)	(829)	(516)	(52)	-	(3,674)
Write-offs	-	-	(46)	-	-	(46)
Transfers	-	-	7,106	(7,746)	-	(640)
Foreign exchange difference	(1,572)	(28)	(1,232)	(35)	2	(2,865)
At 31 December 2020	461,133	4,505	307,973	92,556	3,033	869,200
Depreciation						
At 1 January 2020	75,629	3,354	204,116	-	470	283,569
Charge for the year	7,557	779	15,233	-	471	24,040
Relating to disposals	(1,084)	(829)	(490)	-	-	(2,403)
Relating to write-offs	-	-	(45)	-	-	(45)
Foreign exchange difference	(26)	(27)	(1,189)	-	-	(1,242)
At 31 December 2020	82,076	3,277	217,625	-	941	303,919
Net carrying value						
At 31 December 2020	379,057	1,228	90,348	92,556	2,092	565,281

Set out below is the breakdown of the carrying amounts of the Bank's right-of-use assets and the movements during the period:

	<i>Head Office & warehouse LL million</i>	<i>Branches LL million</i>	<i>Total LL million</i>
As at 1 January 2021	737	1,355	2,092
Depreciation expense	(120)	(313)	(433)
Additions	-	325	325
As at 31 December 2021	617	1,367	1,984
	<i>Head Office & warehouse LL million</i>	<i>Branches LL million</i>	<i>Total LL million</i>
As at 1 January 2020	856	1,705	2,561
Depreciation expense	(120)	(351)	(471)
Foreign exchange difference	1	1	2
As at 31 December 2020	737	1,355	2,092

23 INTANGIBLE ASSETS

	<i>Key money</i> <i>LL million</i>	<i>Software</i> <i>development</i> <i>LL million</i>	<i>Total</i> <i>LL million</i>
Cost			
At 1 January 2021	1,757	16,586	18,343
Additions	-	411	411
Disposals	-	(174)	(174)
At 31 December 2021	<u>1,757</u>	<u>16,823</u>	<u>18,580</u>
Amortization			
At 1 January 2021	1,757	15,329	17,086
Charge for the year	-	673	673
At 31 December 2021	<u>1,757</u>	<u>16,002</u>	<u>17,759</u>
Net carrying value			
At 31 December 2021	<u>-</u>	<u>821</u>	<u>821</u>
	<i>Key money</i> <i>LL million</i>	<i>Software</i> <i>development</i> <i>LL million</i>	<i>Total</i> <i>LL million</i>
Cost			
At 1 January 2020	1,757	15,660	17,417
Additions	-	418	418
Transfers	-	521	521
Foreign exchange difference	-	(13)	(13)
At 31 December 2020	<u>1,757</u>	<u>16,586</u>	<u>18,343</u>
Amortization			
At 1 January 2020	1,757	14,317	16,074
Charge for the year	-	1,012	1,012
At 31 December 2020	<u>1,757</u>	<u>15,329</u>	<u>17,086</u>
Net carrying value			
At 31 December 2020	<u>-</u>	<u>1,257</u>	<u>1,257</u>

At 31 December 2021

24 ASSETS OBTAINED IN SETTLEMENT OF DEBT

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Cost		
At 1 January	51,615	56,560
Additions	9,090	11,215
Disposals	(14,637)	(16,169)
Translation difference	(2)	9
At 31 December	<u>46,066</u>	<u>51,615</u>
Impairment		
At 1 January	762	536
Charge for the year (note 12)	-	421
Write-back	(371)	(195)
At 31 December	<u>391</u>	<u>762</u>
Net carrying value		
At 31 December	<u><u>45,675</u></u>	<u><u>50,853</u></u>

25 OTHER ASSETS

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Prepayments	18,952	22,235
Regularization accounts (i)	369	2,334
Precious metals and stamps	1,067	905
Sundry debtors (ii)	6,543	1,669
Others	4,979	3,547
	<u>31,910</u>	<u>30,690</u>

(i) Regularization accounts

This account represents checks between head office and branches and some letters of credit and guarantees outstanding at year end.

(ii) Sundry debtors

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Sundry debtors	6,914	2,040
Less: Provision against sundry debtors	(371)	(371)
	<u>6,543</u>	<u>1,669</u>

26 DUE TO CENTRAL BANKS

	2021 <i>LL million</i>	2020 <i>LL million</i>
Central Bank of Lebanon (a)	381,721	468,093
Term borrowings under leverage arrangements (b)	2,321,271	2,321,271
Central Bank of Jordan	130,834	85,157
Accrued interest payable	34,046	35,118
	<u>2,867,872</u>	<u>2,909,639</u>

- (a) Following the Central Bank of Lebanon issued Intermediary Circulars, the Central Bank of Lebanon offered the commercial banks facilities up to a ceiling of LL 1,500 billion to be granted to customers and with a time limit ending on 15 October 2017. Facilities obtained are subject to an interest rate of 1% per annum payable on a monthly basis with the first payment due on 2 January 2018.
- (b) Term borrowings under leverage arrangements with the Central Bank of Lebanon represent term borrowings denominated in Lebanese Lira, bearing an interest rate of 2% per annum and having maturities ranging between 2022 and 2033, fully invested in pledged Lebanese treasury bills and blocked term placements with Central Bank of Lebanon in Lebanese Lira earning coupon rates ranging between 6.5% per annum and 10.5%. Simultaneously the Bank has further deposited with the Central Bank of Lebanon term placements in foreign currencies at 6.5% per annum and in Lebanese Lira at 10.5% per annum (originated from the sale of foreign currencies) carrying the same maturities. During 2019, the Bank and the Central Bank of Lebanon signed a netting agreement covering only leverage arrangements that were invested in blocked term placement with the Central Bank of Lebanon in Lebanese Lira. This agreement qualifies for netting under the requirements of IAS 32.

The below tables summarizes the leverage arrangements and related financial assets subject to offsetting, and enforceable similar agreements, and whether offset is achieved in the balance sheet. The table identifies the amounts that have been offset in the balance sheet and also those amounts that are covered by enforceable netting arrangements (financial collateral) but do not qualify for netting under the requirements of IAS 32 described in the accounting policies:

	2021 <i>LL million</i>	2020 <i>LL million</i>
Leverage arrangements		
Gross amounts	7,692,090	8,045,124
Amounts offset against ⁽¹⁾		
Placements with the Central Bank of Lebanon (note 14)	(5,370,819)	(5,723,853)
Net amounts reported on the balance sheet	<u>2,321,271</u>	<u>2,321,271</u>
Financial collateral		
Lebanese treasury bills (note 20)	<u>2,321,271</u>	<u>2,321,271</u>

⁽¹⁾ Represents amounts that can be offset under IAS 32. Placements with the Central Bank of Lebanon have also been reported on the balance sheet net of the amounts above.

During 2021, financial assets and financial liabilities that were settled on a net basis amounted to LL 353,034 million (2020: LL 1,655,388 million) (note 14).

BLOM Bank SAL

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27 DUE TO BANKS AND FINANCIAL INSTITUTIONS

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Current accounts	117,310	155,337
Time deposits	68,304	111,997
	<u>185,614</u>	<u>267,334</u>

28 DUE TO SISTER BANKS

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Current accounts	26,894	102,570
Time deposits	120,568	113,783
	<u>147,462</u>	<u>216,353</u>

29 CUSTOMERS' DEPOSITS AT AMORTIZED COST

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Sight deposits	9,638,410	7,843,064
Time deposits	8,484,404	10,728,745
Saving accounts	8,460,554	9,046,162
Credit accounts and deposits against debit accounts	177,847	262,137
Margins on letters of credit	5,335	4,197
	<u>26,766,550</u>	<u>27,884,305</u>

Customers' deposits include coded deposit accounts amounting to LL 33,769 million as of 31 December 2021 (2020: LL 42,685 million).

30 DEBT ISSUED AND OTHER BORROWED FUNDS

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Certificates of deposits issued by the Bank	37,688	37,688
Accrued interest	495	480
	<u>38,183</u>	<u>38,168</u>

During 2020, the Bank issued new certificates of deposits at par amounting to US\$ 25 million (equivalent to LL 37,688 million) subject to a fixed rate which matures after 30 months from the issuance date.

31 OTHER LIABILITIES

	<i>2021</i>	<i>2020</i>
	<i>LL million</i>	<i>LL million</i>
Current tax liability	448,194	291,287
Accrued expenses and other regularization accounts	64,826	55,133
Deferred tax liability	38,243	76,927
Sundry creditors	23,971	20,160
Transactions pending between branches	5,185	8,802
Lease liabilities (a)	2,498	2,583
Dividends payable	327	327
Other taxes	65,798	139,478
Other liabilities (b)	46,061	75,773
	<u>695,103</u>	<u>670,470</u>

(a) Set out below are the carrying amounts of lease liabilities and the movements during the year ended 31 December 2021:

	<i>2021</i>	<i>2020</i>
	<i>LL million</i>	<i>LL million</i>
Balance at 1 January	2,583	3,310
Additions	325	-
Interest expense	258	298
Paid during the year	(668)	(1,025)
	<u>2,498</u>	<u>2,583</u>

(b) Other liabilities include unclaimed balances on early redemption of certificates of deposit amounting to LL 46,061 million as of 31 December 2021 (2020: LL 75,773 million).

32 PROVISIONS FOR RISKS AND CHARGES

	<i>2021</i>	<i>2020</i>
	<i>LL million</i>	<i>LL million</i>
Provision for foreign currency fluctuation	110,609	1,802
Retirement benefits obligation (i)	27,879	23,878
Provisions for ECL on financial guarantees and commitments	3,899	4,328
Provisions for risks and charges (ii)	1,303	1,303
Other provisions	39	2,499
	<u>143,729</u>	<u>33,810</u>

32 PROVISIONS FOR RISKS AND CHARGES (continued)**(i) Retirement benefits obligation**

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Balance at 1 January	23,878	38,053
Charge (write back) during the year (note 11)	6,638	(11,640)
Benefits paid	(2,455)	(2,523)
Transfer to sister entities	-	6
Translation difference	(182)	(18)
Balance at 31 December	<u>27,879</u>	<u>23,878</u>

(ii) Provision for risk and charges

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Balance at 1 January	1,303	2,094
Write back during the year	-	(653)
Paid during the year	-	(138)
Balance at 31 December	<u>1,303</u>	<u>1,303</u>

33 SHARE CAPITAL AND PREMIUMS

	<i>2021</i>		<i>2020</i>	
	<i>Share capital LL million</i>	<i>Share premium LL million</i>	<i>Share capital LL million</i>	<i>Share premium LL million</i>
Common shares – Authorized, issued and fully paid				
215,000,000 shares at LL 1,500 per share as of 31 December 2021 (31 December 2020: 215,000,000 shares at LL 1,500 per share)	<u>322,500</u>	<u>374,085</u>	<u>322,500</u>	<u>374,085</u>

All of the Bank's common shares are listed in the Beirut Stock Exchange starting 20 June 2008. Out of the total common shares, 73,896,010 shares are listed as Global Depository Receipts (GDRs) in the Luxembourg Stock Exchange. On 23 October 2020, the Bank announced that it has applied for the withdrawal of its Global Depository Shares from trading on the EUROMTF and the Official List of Luxembourg Stock Exchange with effect from 24 November 2020. Moreover, the GDSs and its underlying shares will continue to trade on the Beirut Stock Exchange. Noting that the Global Depository receipt program (GDR) will continue to operate and all GDSs will remain outstanding.

In accordance with the Central Bank of Lebanon Intermediate Circular 616, no dividends were distributed from 2019, 2020 and 2021 profits.

34 NON DISTRIBUTABLE RESERVES

	<i>Non-distributable general reserves LL million</i>	<i>Legal reserve LL million</i>	<i>Reserve appropriated for capital increase LL million</i>	<i>Total LL million</i>
At 1 January 2020	1,857,540	647,718	132,390	2,637,648
Transfer to retained earnings	(10,649)	-	-	(10,649)
Appropriation of 2019 profits	-	2,604	5,089	7,693
Transfer from (loss) profit for the year (*)	86,451	-	-	86,451
Net loss on sale of treasury shares	-	-	(7,926)	(7,926)
At 31 December 2020	1,933,342	650,322	129,553	2,713,217
Transfer to retained earnings	(36,361)	-	-	(36,361)
Appropriation of 2020 profits	-	-	7,209	7,209
Sale of Blom Bank Egypt SAE	(105,115)	-	-	(105,115)
Other adjustments	97,243	-	-	97,243
At 31 December 2021	1,889,109	650,322	136,762	2,676,193

(*) During 2020, the Bank transferred the impact of the voluntary change in accounting policy to non-distributable general reserves.

Non-distributable general reserves

According to the Central Bank of Lebanon Main Circular 143, Banks in Lebanon are required to transfer to “Non-distributable general reserves”, the balance of “Reserve for general banking risks” and “Reserve for retail loans” previously appropriated in line with the requirements of decision 7129 and decision 7776 respectively. This reserve is part of the Bank’s equity and is not available for distribution.

Legal reserve

According to the Lebanese Code of Commerce and to the Money and Credit Act, banks and companies operating in Lebanon have to transfer 10% of their annual net profit to a legal reserve. In addition, branches are also subject to legal reserve requirements based on the rules and regulations of the countries in which they operate. This reserve cannot be distributed as dividends.

During 2020, the Bank appropriated LL 2,604 million from 2019 profits to the legal reserve in accordance with the General Assembly of Shareholders’ resolution.

Reserve appropriated for capital increase

During 2021, the Bank appropriated LL 7,209 million from 2020 profits to the reserve appropriated for capital increase in accordance with the General Assembly of Shareholders’ resolution (2020: LL 5,089 million).

35 DISTRIBUTABLE RESERVES

	<i>2021 LL million</i>	<i>2020 LL million</i>
General reserves	37,696	37,696

General reserves

The Bank appropriates general reserves from its retained earnings to strengthen its equity. This reserve amounting to LL 37,696 million (2020: the same) is available for dividend distributions.

36 TREASURY SHARES

Movement of treasury shares recognized in the separate statement of financial position is as follows:

	2021		2020	
	<i>Number of shares</i>	<i>Cost LL million</i>	<i>Number of Shares</i>	<i>Cost LL million</i>
Balance at 1 January	275,664	4,434	792,980	13,531
Sale of treasury shares	-	-	(517,316)	(9,097)
Balance at 31 December	<u>275,664</u>	<u>4,434</u>	<u>275,664</u>	<u>4,434</u>

The treasury shares represent 14,564 Global Depository Receipts (GDR) and 261,100 ordinary shares owned by the Bank as at 31 December 2021 (2020: the same). The market value of one GDR and one ordinary share were US\$ 3.31 and US\$ 3.75 respectively as of 31 December 2021 (2020: US\$ 2.20 and US\$ 2.07 respectively).

The Bank realized a loss of LL 8 million from the sale of treasury shares during the year 2020. Gains and losses are reflected under "Non-distributable reserves" (note 34).

37 REVALUATION RESERVE OF REAL ESTATE

	2021 <i>LL million</i>	2020 <i>LL million</i>
Revaluation reserve accepted in Tier II capital	11,842	11,842

38 CASH AND CASH EQUIVALENTS

	2021 <i>LL million</i>	2020 <i>LL million</i>
Cash and balances with central banks	3,254,643	1,542,728
Deposits with banks and financial institutions (whose original maturities are less than 3 months)	601,792	357,092
Deposits with sister banks (whose original maturities are less than 3 months)	18,031	43,185
	<u>3,874,466</u>	<u>1,943,005</u>
Less:		
Due to central banks	(78,025)	(94,285)
Due to banks and financial institutions (whose original maturities are less than 3 months)	(117,907)	(208,705)
Due to sister banks (whose original maturities are less than 3 months)	(147,462)	(216,353)
	<u>(343,394)</u>	<u>(519,343)</u>
	<u>3,531,072</u>	<u>1,423,662</u>

38 CASH AND CASH EQUIVALENTS (continued)

Cash and cash equivalents include balances in foreign currencies that are subject to unofficial capital controls and restricted transfers outside Lebanon. Accordingly, these balances are not considered readily convertible to known amounts of cash in the denomination currency without a risk of changes in value. However, the Bank maintains their classification as cash and cash equivalents as they are freely transferrable within the Lebanese territory. These balances were as follows as at 31 December 2021 and 31 December 2020:

	<i>2021</i>	<i>2020</i>
	<i>LL million</i>	<i>LL million</i>
Cash and balances with central banks	3,162,086	1,431,641
Deposits with banks and financial institutions (whose original maturities are less than 3 months)	56,944	117,525
Deposits with sister banks (whose original maturities are less than 3 months)	7,988	9,656
	3,227,018	1,558,822
Less:		
Due to central banks	(41,674)	(41,453)
Due to banks and financial institutions (whose original maturities are less than 3 months)	(14,520)	(13,017)
Due to sister banks (whose original maturities are less than 3 months)	(144,669)	(215,292)
	(200,863)	(269,762)
	3,026,155	1,289,060

39 DIVIDENDS DECLARED AND PAID

In accordance with the Central Bank of Lebanon intermediary circular 616, the Board of Directors did not propose the payment of any dividends for the years ended on 31 December 2020 and 2021.

40 FAIR VALUE OF FINANCIAL INSTRUMENTS

The fair values in this note are stated at a specific date and may be different from the amounts which will actually be paid on the maturity or settlement dates of the instrument. In many cases, it would not be possible to realize immediately the estimated fair values given the size of the portfolios measured. Accordingly, these fair values do not represent the value of these instruments to the Bank as a going concern. Financial assets and liabilities are classified according to a hierarchy that reflects the significance of observable market inputs. The three levels of the fair value hierarchy are defined below.

Quoted market prices – Level 1

Financial instruments are classified as Level 1 if their value is observable in an active market. Such instruments are valued by reference to unadjusted quoted prices for identical assets or liabilities in active markets where the quoted price is readily available, and the price represents actual and regularly occurring market transactions on an arm's length basis. An active market is one in which transactions occur with sufficient volume and frequency to provide pricing information on an ongoing basis.

Valuation technique using observable inputs – Level 2

Financial instruments classified as Level 2 have been valued using models whose most significant inputs are observable in an active market. Such inputs include quoted prices for similar assets or liabilities in active markets, quoted prices for identical instruments in inactive markets, and observable inputs other than quoted prices such as interest rates and yield curves, implied volatilities, and credit spreads.

40 FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

Valuation technique using significant unobservable inputs – Level 3

Financial instruments are classified as Level 3 if their valuation incorporates significant inputs that are not based on observable market data (unobservable inputs). A valuation input is considered observable if it can be directly observed from transactions in an active market, or if there is compelling external evidence demonstrating an executable exit price. Unobservable input levels are generally determined based on observable inputs of a similar nature, historical observations or other analytical techniques.

Effects of exchange rates on the fair value measurements:

The fair value disclosures for other assets and liabilities are first determined in their original currency, which is not the Lebanese Lira in the case of most of the assets and liabilities reported below. These are then translated to Lebanese Lira at the official published exchange rate as discussed in note 1. However, in light of the high deviation between the parallel market rate, the Sayrafa rates and the official exchange rates, Management estimates that the amounts reported in this note in LL do not reflect a reasonable estimate of expected cash flows in Lebanese Lira that would have to be generated from the realisation of such assets or the payment of such liabilities at the date of the separate financial statements and Management is unable to estimate the effects on the fair value measurement. This matter should be taken into consideration when interpreting the fair value disclosures in this note, especially those under Level 1 and Level 2. Classification within Levels 1 and 2 do not take into consideration the “lack of observability” of the exchange rate.

Fair value measurement hierarchy of the financial assets and liabilities carried at fair value:

	2021			
	<i>Valuation techniques</i>			<i>Total</i>
	<i>Level 1</i>	<i>Level 2</i>	<i>Level 3</i>	
	<i>LL million</i>	<i>LL million</i>	<i>LL million</i>	<i>LL million</i>
FINANCIAL ASSETS				
Derivative financial instruments:				
Forward foreign exchange contracts	-	1,356	-	1,356
Financial assets at fair value through profit or loss:				
Treasury bills and bonds	138	315	-	453
Corporate debt instruments	208,432	3,069	-	211,501
Equity instruments	7,669	16,993	-	24,662
Funds	-	-	39,683	39,683
Financial assets at fair value through other comprehensive income:				
Equity instruments	2,385	853	-	3,238
	2020			
	<i>Valuation techniques</i>			<i>Total</i>
	<i>Level 1</i>	<i>Level 2</i>	<i>Level 3</i>	
	<i>LL million</i>	<i>LL million</i>	<i>LL million</i>	<i>LL million</i>
FINANCIAL ASSETS				
Derivative financial instruments:				
Forward foreign exchange contracts	-	2	-	2
Financial assets at fair value through profit or loss:				
Treasury bills and bonds	172	298	-	470
Corporate debt instruments	-	3,070	-	3,070
Equity instruments	9,107	18,313	-	27,420
Funds	-	-	40,293	40,293
Financial assets at fair value through other comprehensive income:				
Equity instruments	2,973	238	-	3,211

There were no transfers between levels during 2021 (2020: the same).

40 FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

Valuation techniques used for material classes of financial assets and liabilities categorized within Level 2 and Level 3:

Derivatives

Derivative products are valued using a valuation technique with market observable inputs. The most frequently applied valuation techniques include forward pricing and swap models, using present value calculations. The models incorporate various inputs including the credit quality of counterparties, foreign exchange spot and forward rates.

Funds and Equity Shares of Non-listed Entities

Units held in funds are measured based on their net asset value (NAV), taking into account redemption and/or other restrictions. Classification between Level 2 and Level 3 is dependent on whether the NAV is observable or unobservable (i.e., recent and published by the fund administrator or not).

Equity shares of non-listed entities are investments in private companies, for which there is no or only limited sufficient recent information to determine fair value. The Bank determined that cost adjusted to reflect the investee's financial position and results since initial recognition represents the best estimate of fair value. Classification between Level 2 and Level 3 is based on whether the financial statements of the investee are recent and published or not. These instruments are fair valued using third-party information (NAV or financial statements of non-listed entities), without adjustment. Accordingly, quantitative information about significant unobservable inputs and sensitivity analysis cannot be developed by the Bank in accordance with IFRS 13.93 (d).

Comparison of carrying and fair values for financial assets and liabilities not held at fair value:

Financial assets and liabilities concentrated in Lebanon

These assets and liabilities consist of balances with the Central Bank of Lebanon and Lebanese Banks, Lebanese government securities, loans and advances to customers and related parties, due to the Central Bank of Lebanon and Lebanese Banks, customers and related parties deposits, and debt issued and other borrowed funds. These are illiquid in nature and the measurement of their fair value is usually determined through discounted cash flow valuation models using observable market inputs, comprising of interest rates and yield curves, implied volatilities, and credit spreads. Due to the situation described in note 1 and the unprecedented levels of uncertainty surrounding the economic crisis that Lebanon, and particularly the banking sector, is experiencing, management is unable to produce faithful estimation of the fair value of these financial assets and liabilities.

Financial assets and liabilities not concentrated in Lebanon

These are not significant to the Bank's separate financial statements.

41 CONTINGENT LIABILITIES, COMMITMENTS AND LEASING ARRANGEMENTS

Credit – related commitments

To meet the financial needs of customers, the Bank enters into various commitments, guarantees, and other contingent liabilities, which are mainly credit-related instruments including both financial and non-financial guarantees and commitments to extend credit. Even though these obligations may not be recognized on the statement of financial position, they do contain credit risk and are therefore part of the overall risk of the Bank. The table below discloses the nominal principal amounts of credit-related commitments and contingent liabilities. Nominal principal amounts represent the amount at risk should the contracts be fully drawn upon and clients default. As a significant portion of guarantees and commitments is expected to expire without being withdrawn, the total of the nominal principal amount is not indicative of future liquidity requirements.

41 CONTINGENT LIABILITIES, COMMITMENTS AND LEASING ARRANGEMENTS (continued)

Credit – related commitments (continued)

	2021		
	<i>Banks</i> <i>LL million</i>	<i>Customers</i> <i>LL million</i>	<i>Total</i> <i>LL million</i>
Guarantee and contingent liabilities			
Financial guarantees	17,935	168,474	186,409
Other guarantees	1,804	85,291	87,095
	<u>19,739</u>	<u>253,765</u>	<u>273,504</u>
Commitments			
Documentary credits	6,744	-	6,744
Loan commitments	-	400,641	400,641
<i>Of which revocable</i>	-	234,827	234,827
<i>Of which irrevocable</i>	-	165,814	165,814
Securities pledged with the Central Bank of Lebanon	2,342,765	-	2,342,765
Other commitments	4,690	9,008	13,698
	<u>2,354,199</u>	<u>409,649</u>	<u>2,763,848</u>
	2020		
	<i>Banks</i> <i>LL million</i>	<i>Customers</i> <i>LL million</i>	<i>Total</i> <i>LL million</i>
Guarantee and contingent liabilities			
Financial guarantees	24,002	208,777	232,779
Other guarantees	1,653	95,312	96,965
	<u>25,655</u>	<u>304,089</u>	<u>329,744</u>
Commitments			
Documentary credits	4,170	-	4,170
Loan commitments	-	390,650	390,650
<i>Of which revocable</i>	-	232,658	232,658
<i>Of which irrevocable</i>	-	157,992	157,992
Securities pledged with the Central Bank of Lebanon	2,342,765	-	2,342,765
Other commitments	4,891	19,574	24,465
	<u>2,351,826</u>	<u>410,224</u>	<u>2,762,050</u>

Financial guarantees

Guarantees are given as security to support the performance of a customer to third parties. The main types of guarantees provided are:

- Financial guarantees given to banks and financial institutions on behalf of customers to secure loans, overdrafts, and other banking facilities; and
- Other guarantees are contracts that have similar features to the financial guarantee contracts but fail to meet the strict definition of a financial guarantee contract under IFRS. These mainly include performance guarantees, advance payment guarantees and tender guarantees.

Documentary credits

Documentary credits commit the Bank to make payments to third parties, on production of documents which are usually reimbursed immediately by customers.

41 CONTINGENT LIABILITIES, COMMITMENTS AND LEASING ARRANGEMENTS
(continued)

Credit – related commitments (continued)

Loan commitments

Loan commitments are defined amounts (unutilized credit lines or undrawn portions of credit lines) against which clients can borrow money under defined terms and conditions.

Revocable loan commitments are those commitments that can be unconditionally cancelled at any time subject to notice requirements according to their general terms and conditions. Irrevocable loan commitments result from arrangements where the Bank has no right to withdraw the loan commitment once communicated to the beneficiary.

Legal claims

Litigation is a common occurrence in the banking industry due to the nature of the business. The Bank has an established protocol for dealing with such legal claims. Once professional advice has been obtained and the amount of damages reasonably estimated, the Bank makes adjustments to account for any adverse effects which the claims may have on its financial standing. At year end, the Bank had several unresolved legal claims including those relating to the restrictive measures and unofficial capital controls in place. Based on advice from legal counsel, and despite the novelty of the certain claims and the uncertainties inherent in their unique situation management believes that legal claims will not result in any significant financial loss to the Bank, except as provided for in note 49.

Capital commitments

Capital expenditure that were not provided for as of the separate statement of financial position date are as follows:

	<i>2021</i>	<i>2020</i>
	<i>LL million</i>	<i>LL million</i>
<i>Capital commitments</i>		
Property and equipment purchases	4,919	5,094

Other commitments and contingencies

The Bank's books in Lebanon for the years 2015 to 2017 (inclusive) are currently under review by the tax authorities. The books of HSBC Bank Middle East Limited – Lebanon Branch were reviewed by the tax authorities from the years 2015 till 31 October 2017 (inclusive). The tax authorities have issued a preliminary report on 2 March 2022 resulting in additional taxes of LL 10,401 million. The Bank's books in Lebanon remain subject to the review of the tax authorities for the years 2018 to 2021 (inclusive).

The books of the Head Office and Lebanese Branches of the Bank were reviewed by the National Social Security Fund (NSSF) and were subject to a discharge for the period from 1 October 2014 until 30 September 2020. The Bank's books in Lebanon remain subject to the review by the NSSF for the period from 1 October 2020 to 31 December 2021.

In addition, the books and records of the foreign branches of the Bank are subject to review by the tax and social security authorities in the countries in which they operate.

Management believes that adequate provisions were recorded against possible review results to the extent that they can be reliably estimated.

42 ASSETS HELD IN CUSTODY AND UNDER ADMINISTRATION

Assets held in custody and under administration include client assets managed or deposited with the Bank. For the most part, the clients decide how these assets are to be invested.

	<i>2021</i>	<i>2020</i>
	<i>LL million</i>	<i>LL million</i>
Assets held in custody and under administration	1,734,315	1,436,293

The Bank provides safekeeping and servicing activities on behalf of clients, in addition to various support functions including the valuation of portfolios of securities and other financial assets, which complements the custody business.

43 RELATED PARTY TRANSACTIONS

Parties are considered to be related if one party has the ability to control the other party or exercise significant influence over the other party in making financial or operation decisions, or one other party controls both. The definition includes subsidiaries, key management personnel and their close family members, as well as entities controlled or jointly controlled by them.

Key management personnel are defined as those persons having authority and responsibility for planning, directing and controlling the activities of the Bank, directly or indirectly.

Loans to related parties, (a) were made in the ordinary course of business, (b) were made on substantially the same terms, including interest rates and collateral, as those prevailing at the same time for comparable transactions with others and (c) did not involve more than a normal risk of collectability or present other unfavorable features.

Subsidiaries

A list of the Bank's principal subsidiaries is shown in note 21. Transactions between the Bank and its subsidiaries meet the definition of related party transactions.

The following table provides the total amount of transactions and the amount of outstanding balances (including commitments) with related parties for the relevant financial year.

	Outstanding balance as at 31 December 2021				
	<i>Key management personnel</i>	<i>Subsidiaries</i>	<i>Other related parties</i>	<i>Expected credit losses</i>	<i>Net</i>
	<i>LL million</i>	<i>LL million</i>	<i>LL million</i>	<i>LL million</i>	<i>LL million</i>
Deposits	12,589	439,652	57,479	-	509,720
Net loans and advances	4,207	-	1,172	(15)	5,364
Subordinated loans	-	21,107	-	(23)	21,084
Due from sister banks	-	18,031	-	-	18,031
Due to sister banks	-	147,462	-	-	147,462
Guarantees given	6	26,739	1,824	-	28,569
Commitments given	-	1,797	-	-	1,797
Guarantees received	-	206,350	-	-	206,350
Commitments received	-	255	-	-	255
Assets under custody given	-	216,180	-	-	216,180

43 RELATED PARTY TRANSACTIONS (continued)

	Outstanding balance as at 31 December 2020				
	<i>Key management personnel</i> LL million	<i>Subsidiaries</i> LL million	<i>Other related parties</i> LL million	<i>Expected credit losses</i> LL million	<i>Net</i> LL million
Deposits	18,107	483,048	57,311	-	558,466
Net loans and advances	3,648	-	1,658	(4)	5,302
Subordinated loans	-	33,169	-	(45)	33,124
Due from sister banks	-	43,185	-	-	43,185
Due to sister banks	-	216,353	-	-	216,353
Guarantees given	6	41,449	1,823	-	43,278
Commitments given	-	1,916	-	-	1,916
Guarantees received	-	226,665	-	-	226,665
Commitments received	-	278	-	-	278
Assets under custody given	-	4,237	-	-	4,237
End of Service indemnity	-	2	-	-	2

	Revenues and expenses for the year ended 31 December 2021			
	<i>Key management personnel</i> LL million	<i>Subsidiaries</i> LL million	<i>Other related parties</i> LL million	<i>Total</i> LL million
Interest paid on deposits	148	15,758	605	16,511
Interest received from net loans and advances	420	1	64	485
Insurance expenses	-	11,963	-	11,963
Rent expense	-	614	-	614
Interest revenues	-	24	-	24
Interest expenses	-	1,285	-	1,285
Interest revenue from subordinated loans	-	99	-	99
Commission income	-	1,035	-	1,035
Custody expense	-	7	-	7

	Revenues and expenses for the year ended 31 December 2020			
	<i>Key management personnel</i> LL million	<i>Subsidiaries</i> LL million	<i>Other related parties</i> LL million	<i>Total</i> LL million
Interest paid on deposits	454	22,200	1,443	24,097
Interest received from net loans and advances	389	1	192	582
Insurance expenses	-	10,932	-	10,932
Rent expense	-	614	-	614
Interest revenues	-	280	-	280
Interest expenses	-	5,135	-	5,135
Interest revenue from subordinated loans	-	402	-	402
Commission income	-	1,555	-	1,555
Custody expense	-	18	-	18

Compensation of the Key Management Personnel of the Bank

	2021 LL million	2020 LL million
Short-term benefits	11,254	12,300
Post-employment benefits written-back during the year, net	193	87

44 RISK MANAGEMENT

The Bank is exposed to various types of risks, some of which are:

- Credit risk: the risk of default or deterioration in the ability of a borrower to repay a loan.
- Market risk: the risk of loss in balance sheet and off-balance sheet positions arising from movements in market prices. Movements in market prices include changes in interest rates (including credit spreads), exchange rates and equity prices.
- Liquidity risk: the risk that the Bank cannot meet its financial obligations when they come due in a timely manner and at reasonable cost.
- Operational risk: the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events.
- Other risks faced by the Bank include concentration risk, reputation risk, legal risk, political risk and business/strategic risk.

The Bank manages its business activities within risk management guidelines as set by the Bank's "Risk Management Policy" approved by the Board of Directors. The Bank recognizes the role of the Board of Directors and executive management in the risk management process as set out in the Banking Control Commission circular 242. In particular, it is recognized that ultimate responsibility for establishment of effective risk management practices and culture lies with the Board of Directors as does the establishing of the Bank's risk appetite and tolerance levels. The Board of Directors delegates through its Risk Management Committee the day-to-day responsibility for establishment and monitoring of risk management process across the Bank's group to the Group Chief Risk Officer, who is directly appointed by the Board of Directors, in coordination with executive management at BLOM Bank SAL.

The Board's Risk Management Committee has the mission to periodically (1) review and assess the risk management function of the Bank, (2) review the adequacy of the Bank's capital and its allocation within the Bank, and (3) review risk limits and reports and make recommendations to the Board.

The Group Chief Risk Officer undertakes his responsibilities through the "Group Risk Management Division" in Beirut which also acts as Group Risk Management, overseeing and monitoring risk management activities throughout the Bank. The Group Chief Risk Officer is responsible for establishing the function of Risk Management and its employees across the Bank.

BLOM Bank's Risk Management aids executive management in monitoring, controlling and actively managing and mitigating the Bank's overall risk. The Division mainly ensures that:

- Risk practices are fit for purpose and aligned with best practices as far as practicable.
- Risk policies and methodologies are consistent with the Bank's risk appetite.
- Limits and risk across banking activities are monitored and managed throughout the Bank.

Through a comprehensive risk management framework, transactions and outstanding risk exposures are quantified and compared against authorized limits, whereas non-quantifiable risks are monitored against policy guidelines as set by the Bank's "Risk Management Policies". Any discrepancies, breaches or deviations are escalated to executive senior management in a timely manner for appropriate action.

In addition to the Bank's Risk Management in Lebanon, risk managers and / or risk officers were assigned within the Bank's foreign subsidiaries or branches to report to the Group Risk Management and executive senior management in a manner that ensures:

- Standardization of risk management functions and systems developed across the Bank.
- Regional consistency of conducted business in line with the board's approved risk appetite.

The major objective of risk management is the implementation of sound risk management practices and the Basel frameworks as well as all related regulatory requirements within the Bank. The Bank has documented a Board approved Disclosure Policy.

45 CREDIT RISK

Credit risk is the risk that the Bank will incur a loss because its customers or counterparties fail to discharge their contractual obligations, including the full and timely payment of principal and interest. Credit risk arises from various balance sheet and off-balance sheet exposures including interbank, loans and advances, credit commitments, financial guarantees, letters of credit, acceptances, investments in debt securities (including sovereign) and derivative financial instruments. Credit risk arising from derivative financial instruments is, at any time, limited to those with positive fair values, as recorded in the separate statement of financial position.

45.1 Credit risk management

Credit risk appetite and limits are set at the Bank level by the Board and are cascaded to the entities, which in turn formulate their own limits in line with the Bank's risk appetite. The Bank manages and controls credit risk by setting limits on the amount of risk it is willing to accept for individual counterparties and for geographical and industry concentrations, and by monitoring exposures in relation to such limits.

Credit risk is monitored by the Bank's credit risk department, which is responsible for assisting the Bank in establishing a credit risk management culture that promotes good analysis, judgements, flexibility and balance between risk and reward.

The Bank has established various credit quality review processes to provide early identification of possible changes in the creditworthiness of counterparties, including regular revisions of credit files, including ratings and collateral quality. The credit quality review process allows the Bank early detections of changes in assets quality, estimate the potential loss and take early corrective actions.

As part of its credit risk governance structure, the Bank has established credit committees for the approval and renewal of credit facilities. Credit committees are responsible for the approval of facilities up to the limit assigned to them, which depends on the size of the exposure and the obligor's creditworthiness as measured by his internal rating. Once approved, facilities are disbursed when all the requirements set by the respective approval authority are met and documents intended as security are obtained and verified by the Credit Administration function.

Starting 2019, the economic situation in Lebanon exerted significant pressure on the asset quality of the domestic loan portfolio. As a result, credit quality of the Lebanese loan portfolio has declined driven by a weakening in the borrowers' creditworthiness across various segment types. In order to address the challenging operating conditions, the Bank has implemented a series of remedial actions that included: i) risk deleveraging by reducing its assets size, ii) increasing collection capacity across various business lines, iii) increasing specific and collective provision coverages, and iv) setting-up an independent, centralised and specialised remedial function to proactively manage borrowers showing weak or deteriorating credit profiles and not yet classified Stage 3.

45.2 Expected credit losses (ECL)

45.2.1 Governance and oversight of expected credit losses

The Bank's IFRS 9 Impairment Committee, which is a committee composed of Executive Committee members, oversees the ECL estimation framework by: i) approving the IFRS 9 impairment policy, ii) reviewing key assumptions and estimations that are part of the ECL calculations; iii) approving the forward-looking economic scenarios; iv) approving staging classifications on a name-by-name basis for material exposures and v) reviewing ECL results.

Impairment policy requirements are set and reviewed regularly, at a minimum annually, to maintain adherence to accounting standards and evolving business models. Key judgements inherent in policy, including the estimated life of revolving credit facilities and the quantitative criteria for assessing the Significant Increase in Credit Risk (SICR), are assessed through a combination of expert judgements and data-driven methodologies.

45 CREDIT RISK (continued)**45.2 Expected credit losses (ECL) (continued)****45.2.1 Governance and oversight of expected credit losses (continued)**

ECL is estimated using a model that takes into account borrowers' exposure, internal risk rating, facility characteristic macroeconomy, and collateral information among others. Models are, by their nature, relying on minimal required historical data as well as incorporating expert opinion are subject to biased output thus, the Bank has established a systematic approach for the development, validation, approval, implementation and on-going use of the models. Models are statistically validated by a qualified independent party to the model development unit, before first use and at a minimum annually thereafter. Each model is designated an owner who is responsible for:

- Monitoring the performance of the model, which includes comparing estimated ECL versus actual ECL; and
- Proposing post-model development calibration to enhance model's accuracy or to account for situations where known or expected risk factors and information have not been considered in the modelling process.

Each model used in the estimation of ECL, including key inputs, are governed by a series of internal controls, which include the validation of completeness and accuracy of data, reconciliation with Finance data, and documentation of the calculation steps.

ECL estimation takes into account a range of future economic scenarios, which are set using mathematical models and expert judgements. Economic scenarios are prepared on a frequent basis, at a minimum annually, to align with the Bank's medium-term planning exercise, but also in the event of significant change in the prevailing economic conditions. The scenario probability weights are also updated when the scenarios are updated.

45.2.2 Definition of default and cure

The Bank considers a financial instrument defaulted for ECL calculations when:

- the borrower is unlikely to pay its credit obligations to the Bank in full, without recourse by the Bank to actions such as realizing security (if any is held);
- the borrower is more than 90 days past due on any material credit obligation to the Bank.
- it is becoming probable that the borrower will restructure the asset as a result of bankruptcy due to the borrower's inability to pay its credit obligations.

Inputs into the assessment of whether a financial instrument is in default and their significance may vary over time to reflect changes in circumstances.

As a part of a qualitative assessment of whether a customer is in default, the Bank carefully considers whether the events listed above should result in classifying the exposures in Stage 3 for ECL calculations or whether Stage 2 is appropriate.

It is the Bank's policy to consider a financial instrument as 'cured' and therefore re-classified out of Stage 3 when none of the default criteria have been present for a specific period of time and after obtaining the approval of the Credit Committee. The decision whether to classify an asset as Stage 2 or Stage 1 once cured is dependent on the absence of SICR criteria compared to initial recognition and is examined on a case by case basis. In case of forbearance under Stage 2, the borrower remains in this stage until all the following conditions have been met: i) at least a 12-month probation period has passed, ii) three consecutive payments under the new repayment schedule have been made, iii) the borrower has no past dues under any obligation to the Bank, and iv) all the terms and conditions agreed to as part of the restructuring have been met.

In response to the COVID-19 global pandemic, governments and regulators around the world have introduced a number of support measures for both retail and non-retail customers under market-wide programs. In Lebanon, the Central Bank of Lebanon issued Intermediary Circular no. 567 dated August 26, 2020, by which it required banks operating in Lebanon to keep the regulatory classification unchanged for obligors that were negatively impacted by this pandemic and not to consider their past-dues, when existing, as evidence of SICR. However, under exceptional circumstances and in case an obligor ceases to be operating on a going concern basis, banks should immediately downgrade the borrower's classification to Stage 3.

45 CREDIT RISK (continued)

45.2 Expected credit losses (ECL) (continued)

45.2.3 The Bank's internal rating and PD estimation process

Central Banks, Sovereigns and Financial Institutions

For central banks, sovereigns and financial institutions' exposures, ratings from recognised external rating agencies are used and mapped to their corresponding PDs as reported by these agencies. These ratings with their corresponding PDs are monitored and updated on a regular basis. With respect to exposures to the Central Bank of Lebanon and Lebanese sovereign, Intermediate Circular 567 modified the regulatory ECLs levels, previously set in its Intermediate Circular 543 issued on 3 February 2020. Regulatory ECL on exposures to Lebanese sovereign bonds in foreign currency was increased from 9.45% to 45%, while regulatory ECLs on exposures to Lebanese sovereign bonds in local currency, exposures to the Central Bank of Lebanon in foreign currency and exposures to the Central Bank of Lebanon in local currency remained unchanged (0%, 1.89% and 0% respectively). This circular however changed the requirement for the recognition of ECL in the banks' financial statements from a "Maximum" level to a "Minimum" one. Due to the high levels of uncertainties, the lack of observable indicators, and the lack of visibility on the government's plans with respect to, among other, the exposures to the Central Bank of Lebanon, the Bank was unable to estimate in a reasonable manner ECL on this exposure and accordingly, as applicable, the loss rate mentioned in Intermediate Circular 567 was adopted. To note that the Bank disposed of the majority of its holding of Lebanese Sovereign Bonds in foreign currency during 2020.

Non-consumer loans

The Credit Risk function, which is independent from business lines, is responsible for the development of internal rating models, and for the estimation of Probability of Default (PD) and Loss Given Default (LGD). The Bank uses an internal rating scale comprised of 10 performing grades and 3 non-performing grades. The grades generated by internal rating models are mapped to PDs using historical default observations. The mapping of rating to PD, which is done initially on a through-the-cycle basis is then adjusted to a point-in-time basis in line with IFRS 9 requirements.

These internal rating models for the Bank's key lending portfolios including Corporate and SME obligors incorporate both qualitative and quantitative criteria such as:

- Historical and projected financial information including debt service coverage, operations, liquidity and capital structure;
- Account behavior, repayment history (factoring in any COVID-19 related regulatory forbearance measure where applicable) and outside and other non-financial information such as management quality, company standing and industry risk;
- Moody's Rating Agency publicly available information related to the clients from external parties. This includes external rating grades issued by rating agencies, independent analyst reports and other market disclosures; and
- Any other objectively supportable information on the obligor's willingness and capacity of repayment.

Internal ratings are initially assigned by the credit origination functions (i.e. business lines) and are approved and validated by the Credit Review and Credit Risk function, which are independent from business lines. Credit Review and Credit Risk functions are responsible for ensuring that ratings assigned to obligors are accurate and updated at all times.

Consumer loans

Consumer lending comprises mainly of personal loans, credit cards, car loans and housing loans. These products are rated by an automated scorecard tool primarily driven by days past due.

The Bank also relies on account behavior to predict the probability of default within a specific timeframe. This is primarily based on the repayment history of consumer borrowers.

45 CREDIT RISK (continued)

45.2 Expected credit losses (ECL) (continued)

45.2.3 The Bank's internal rating and PD estimation process (continued)

Consumer loans (continued)

For the estimation of expected losses for consumer products, the Bank uses currently the loss rate approach by product based on the net flow of exposures from one days-past-due bucket to another (factoring in any COVID-19 related regulatory forbearance measure where applicable). This estimation incorporates by a forward-looking component in line with the IFRS9 standard.

45.2.4 Exposure at default

EAD represents the expected exposure in the event of a default. The Bank derives the EAD from the current exposure to the counterparty and potential changes to the current amount allowed under the contract. The EAD of a financial asset is its gross carrying amount at the time of default. For lending commitments, the EADs are potential future amounts that may be drawn under the contract. For financial guarantees, the EAD represents the amount of the guaranteed exposure when the financial guarantee becomes payable.

45.2.5 Loss given default

LGD is the magnitude of the likely loss if there is a default. The Bank estimates LGD based on the history of recovery rates of claims against defaulted counterparties. It is estimated using information on the counterparty and collateral type including recovery costs. For portfolios in respect of which the Bank has limited historical data, credit expert opinion benchmarked against related regulators is used to supplement the internally available data.

45.2.6 Significant increase in credit risk

The Bank continuously monitors all its credit risk exposures. In order to determine whether an instrument or a portfolio of instruments is subject to 12mECL or LTECL, the Bank assesses whether there has been a significant increase in credit risk since initial recognition, using reasonable and supportable information that is relevant and available without undue cost or effort. This includes both quantitative and qualitative information and analysis, based on the Bank's historical experience and expert credit assessment including forward-looking information. The Bank's assessment of significant increase in credit risk is being performed at least quarterly based on the following:

Non-Consumer loans

Migration of obligor risk rating by a certain number of notches from origination to reporting date as a key indicator of the change in the risk of default at origination with the risk of default at reporting date.

Consumer loans

Thresholds have been based on historical default rates and historical payment behavior to determine significant increase in credit risk.

Qualitative criteria

For non-Consumer loans, the Bank also considers in its assessment of significant increase in credit risk, various qualitative factors including significant adverse changes in the business condition, restructuring due to credit quality weakness during the past 12-months, classification of an exposure under the "Follow-up and arrange" supervisory classification. For Consumer loans, the Bank considers specific events that might be indicative of a significant increase in credit risk such as the event of restructuring.

A financial instrument considered to have experienced a significant increase in credit risk if the instruments is more than 90 days past due on its contractual payments. Movements between Stage 2 and Stage 3 are based on whether financial assets are credit-impaired at the reporting date.

45 CREDIT RISK (continued)

45.2 Expected credit losses (ECL) (continued)

45.2.6 Significant increase in credit risk (continued)

Qualitative criteria (continued)

As noted in section "45.2.2. Definition of default and cure" and in response to the COVID-19 global pandemic, governments and regulators around the world have introduced a number of support measures for both consumer and non-consumer borrowers under market-wide programs.

Downgrade from stage 2 to stage 3 is based on whether financial assets are credit-impaired at the reporting date.

45.2.7 Expected life

With the exception of credit cards and other revolving facilities the maximum period for which the credit losses are determined is the contractual life of a financial instrument unless the Bank has the legal right to call it earlier. With respect to credit cards and other revolving facilities, the Bank does not limit its exposure to credit losses to the contractual notice period, but, instead calculates ECL over a period that reflects the Bank's expectations of the customer behavior, its likelihood of default and the Bank's future risk mitigation procedures, which could include reducing or cancelling the facilities.

45.2.8 Forward looking information

The Bank incorporates forward-looking information at the level of Probability of Default.

On the PD level, the Bank formulates three economic scenarios: a base case, which is the median scenario assigned with a certain probability of occurring, and two other scenarios, one upside and one downside, each assigned a specific chance of occurring, then, a weighted average PD is generated and used for the calculation of the ECL.

External information considered includes economic data and forecasts published by governmental bodies and monetary authorities in the countries where the Bank operates, organizations such as World Bank and the International Monetary Fund, IIF and selected private-sector and academic forecasters. A team of specialists within the Bank's Credit Risk Department verifies the accuracy of inputs to the Bank's ECL models including determining the weights attributable to the multiple scenarios of the PD.

The Bank seeks the highest correlation between macro-economic variables and historical PDs for each portfolio to identify the key drivers for Point in Time Probability of default which is translated into the ECL. Using an analysis of historical data, the Bank has estimated relationships between this macro-economic variable and credit losses. The ECL estimates have been assessed for sensitivity to changes to forecasts of the macro-variable and also together with changes to the weights assigned to the scenarios. For the Bank's various countries of operations, excluding Lebanon, the impact on ECL is not material.

In Lebanon, given the prevailing high uncertainties and challenges, which were further exacerbated by the COVID-19 pandemic as disclosed in note 1, ECLs estimation remains subject to high volatility (including from changes to macroeconomic variable forecasts) especially in the event of a prolonged crisis and continued deterioration in the economic conditions. It is not practical at this time to determine and provide sensitivity analysis that is reasonably possible.

45.2.9 Modified and forbore loans

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

When modification results in derecognition, a new loan is recognized and allocated to Stage 1 (assuming it is not credit-impaired at that time).

45 CREDIT RISK (continued)

45.2 Expected credit losses (ECL) (continued)

45.2.9 Modified and forbore loans (continued)

The Bank renegotiates loans to customers in financial difficulties (referred to as 'forbearance activities') to maximize collection opportunities and minimize the risk of default. Under the Bank's forbearance policy, loan forbearance is granted on a selective basis if the debtor is currently in default on its debt or if there is a high risk of default, there is evidence that the debtor made all reasonable efforts to pay under the original contractual terms and the debtor is expected to be able to meet the revised terms. The revised terms usually include extending the maturity, changing the timing of interest payments and amending the terms of loan covenants. Both consumer and corporate loans are subject to the forbearance policy.

Generally, forbearance is a qualitative indicator of a significant increase in credit risk.

The table below includes Stage 2 and 3 assets that were modified and, therefore, treated as forbore during the period, with the related modification loss suffered by the Bank.

	<i>2021</i>	<i>2020</i>
	<i>LL million</i>	<i>LL million</i>
Amortized costs of financial assets modified during the period	23,878	42,232

There are no previously modified financial assets for which loss allowance has changed to 12mECL measurement as at 31 December 2021 and 31 December 2020. There are no previously modified financial assets for which loss allowance had changed to 12mECL measurement and reverted to LTECL as at 31 December 2021 and 31 December 2020.

At 31 December 2021

45 CREDIT RISK (continued)

45.2 Expected credit losses (ECL) (continued)

45.2.10 Financial assets and ECLs by stage (continued)

The following table represents a reconciliation of the opening to the closing balance of impairment allowances of loans and advances at amortized cost:

	2021			
	Stage 1 LL million	Stage 2 LL million	Stage 3 LL million	Total LL million
Balance as of 1 January	107,647	49,530	700,145	857,322
Impairment loss for the year (note 10)	89,257	12,336	208,212	309,805
Recoveries (note 10)	(77,954)	(4,347)	(204,838)	(287,139)
Charge for the year (transfer from (to) excess provisions under "Provisions for risks and charges") due to business activity and exposure changes	24,259	(24,364)	-	(105)
Net transfers between stages	(4,819)	4,819	-	-
Unrealized interest for the year	-	-	40,810	40,810
Transfer to off-financial position	-	-	(74,816)	(74,816)
Direct write-offs	-	(299)	(15,650)	(15,949)
Foreign exchange difference	(2)	(5)	(824)	(831)
At 31 December 2021	138,388	37,670	653,039	829,097
	2020			
	Stage 1 LL million	Stage 2 LL million	Stage 3 LL million	Total LL million
Balance as of 1 January	87,791	165,487	348,085	601,363
Impairment loss for the year (note 10)	45,596	4,777	467,335	517,708
Recoveries (note 10)	(12,779)	(138,219)	(114,001)	(264,999)
Charge for the year (transfer from (to) excess provisions under "Provisions for risks and charges") due to business activity and exposure changes	9,067	(4,465)	(298)	4,304
Net transfers between stages	(22,017)	22,017	-	-
Unrealized interest for the year	-	-	38,555	38,555
Transfer to off-financial position	-	-	(27,333)	(27,333)
Direct write-offs	-	-	(12,898)	(12,898)
Foreign exchange difference	(11)	(67)	700	622
At 31 December 2020	107,647	49,530	700,145	857,322

Net re-measurements and reallocations include re-measurements as a result of changes in the size of portfolios, reclassifications between stages and risk parameter changes.

45 CREDIT RISK (continued)

45.2 Expected credit losses (ECL) (continued)

45.2.10 Financial assets and ECLs by stage (continued)

The following table represents a reconciliation of the opening to the closing balance of impairment allowances of balances with the Central Bank of Lebanon:

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Balance as of 1 January	1,218,365	378,870
Impairment loss for the year (note 10)	669,165	836,269
Charge for the year (transfer from (to) excess provisions under "Provisions for risks and charges") due to business activity and exposure changes	-	3,226
Transfer to IFRS 9 Reserve	(300)	-
Foreign exchange difference	(1,333)	-
At 31 December	1,885,897	1,218,365

The following table represents a reconciliation of the opening to the closing balance of impairment allowances of Lebanese sovereign treasury bills and bonds and Certificates of Deposits issued by the Central Bank of Lebanon:

	<i>2021</i> <i>LL million</i>	<i>2020</i> <i>LL million</i>
Balance as of 1 January	33,795	33,795
Recoveries (note 10)	(44)	-
At 31 December	33,751	33,795

45 CREDIT RISK (continued)

45.4 Credit quality

The Bank assesses the quality of its credit portfolio using the following credit rating methodologies:

- (i) External ratings from approved credit rating agencies for financial institutions and financial assets.
- (ii) Internal rating models that take into account both financial as well as non-financial information such as management quality, operating environment and company standing.
- (iii) Internally developed scorecards to assess the creditworthiness of retail borrowers in an objective manner and streamline the decision-making process.
- (iv) Supervisory ratings, comprising six main categories: (a) *Regular* includes borrowers demonstrating good to excellent financial condition, risk factors, and capacity to repay. These loans demonstrate regular and timely payment of dues, adequacy of cash flows, timely presentation of financial statements, and sufficient collateral/guarantee when required. (b) *Follow-up* represents a lack of documentation related to a borrower's activity, an inconsistency between facilities' type and related conditions. (c) *Follow-up and arrange* includes credit worthy borrowers requiring close monitoring without being impaired. These loans might be showing weaknesses; insufficient or inadequate cash flows; highly leveraged; deterioration in economic sector or country where the facility is used; loan rescheduling more than once since initiation; or excess utilization above limit. (d) *Substandard* loans include borrowers with incapacity to repay from identified cash flows. Also included under this category are those with recurrent late payments and financial difficulties. (e) *Doubtful* loans where full repayment is questioned even after liquidation of collateral. It also includes loans stagnating for over 6 months and debtors who are unable to repay restructured loans. Finally, (f) *Bad* loans with no or little expected inflows from business or assets. This category also includes borrowers with significant delays and deemed insolvent.

Sovereign

The Bank applies two different PDs based on rating agencies' external studies. A forward-looking adjustment is performed on both PDs via beta regression by considering the relevant macro-economic factors as published by International data sources. The resulting PiT and forward-looking PDs are then used in the ECL calculation under the base case. The Bank then projects these factors under a lower and upper scenario. In 2019, and in compliance with the Central Bank of Lebanon Intermediary Circular 543, the Bank applied the regulatory ECL's ceiling for sovereign exposures (i.e. ECL of 1.89% for Central Bank of Lebanon exposures in foreign currencies and ECL of 0% for sovereign and Central Bank of Lebanon exposures in local currency).

Banks and Financial Institutions

The Bank considers that the credit spread above a given LIBOR rate is a reflective rate for expected credit loss. The cost of risk is considered as a proxy for PD and LGD.

Debt securities

The Bank assigns the second lowest rating amongst the three rating agencies (Moody's, Standard & Poor's and Fitch) for each instrument. The Bank also segregates the country of issuance of these debt securities between Emerging and Advanced Economies based on the International data sources studies. The Bank then conducts a correlation analysis per rating grade for each of the considered group of Advanced Economies and Emerging Economies. The resulting PDs are PiT and forward looking. The Bank then generated scenarios at the PD level.

Commercial Loans

In accordance to the Bank's policy, default is defined when the borrower is 90 days' past due, along with other qualitative indicators on a case-by-case basis. The default definition is reflected in the collection of the default rates on a yearly basis, to be used in the calibration stage of the PD calculation.

45 CREDIT RISK (continued)

45.4 Credit quality (continued)

Consumer Loans

For the purpose of the loss rate calculation, the Bank segregates its Consumer loans portfolio by product and displays the portfolio breakdown by DPD bucket. The Bank adopts this approach for its Consumer facilities that fall within Stage 1. The Bank then analyzes monthly net flow rates whereby the loss rate for each delinquency bucket is computed by considering the flow into the designated loss bucket at which write-off is assumed to occur. Forward looking loss rate is then projected through analysis of correlation with macro-economic factors and regressed under lower, base and upper scenarios. The table below shows the credit quality of the Bank's financial assets and Contingent liabilities based on internal credit ratings and stage classification. The amounts presented are gross of impairment allowances.

	2021			Total LL million
	Stage 1 LL million	Stage 2 LL million	Stage 3 LL million	
Financial assets				
Cash and balances with central banks	1,146,273	26,537,720	-	27,683,993
Due from banks and financial institutions	677,171	-	-	677,171
Due from sister banks	18,031	-	-	18,031
Loans and advances to customers at amortized cost	2,156,949	221,096	798,074	3,176,119
Commercial loans	535,648	132,039	472,918	1,140,605
Consumer loans	1,621,301	89,057	325,156	2,035,514
Loans and advances to related parties at amortized cost	5,379	-	-	5,379
Debtors by acceptances	551	-	-	551
Financial assets at amortized cost	592,952	4,459,089	5,360	5,057,401
Lebanese sovereign and Central Bank of Lebanon	-	4,459,089	-	4,459,089
Other sovereign securities	494,593	-	5,360	499,953
Private sector and other securities	98,359	-	-	98,359
	<u>4,597,306</u>	<u>31,217,905</u>	<u>803,434</u>	<u>36,618,645</u>
Contingent liabilities				
Financial guarantees	269,730	2,939	835	273,504
Documentary credits	6,401	343	-	6,744
Loan commitments	391,236	9,485	-	400,641
Total	<u>667,367</u>	<u>12,687</u>	<u>835</u>	<u>680,889</u>
	2020			Total LL million
	Stage 1 LL million	Stage 2 LL million	Stage 3 LL million	
Financial assets				
Cash and balances with central banks	389,801	26,699,962	-	27,089,763
Due from banks and financial institutions	357,092	-	-	357,092
Due from sister banks	43,185	-	-	43,185
Loans and advances to customers at amortized cost	2,916,518	388,538	1,130,150	4,435,206
Commercial loans	627,417	211,428	654,058	1,492,903
Consumer loans	2,289,101	177,110	476,092	2,942,303
Loans and advances to related parties at amortized cost	5,306	-	-	5,306
Debtors by acceptances	2,776	2	-	2,778
Financial assets at amortized cost	433,661	4,590,236	5,831	5,029,728
Lebanese sovereign and Central Bank of Lebanon	-	4,590,236	-	4,590,236
Other sovereign securities	384,764	-	5,831	390,595
Private sector and other securities	48,897	-	-	48,897
	<u>4,148,339</u>	<u>31,678,738</u>	<u>1,135,981</u>	<u>36,963,058</u>
Contingent liabilities				
Financial guarantees	326,050	2,542	1,152	329,744
Documentary credits	4,169	1	-	4,170
Loan commitments	367,941	22,709	-	390,650
Total	<u>698,160</u>	<u>25,252</u>	<u>1,152</u>	<u>724,564</u>

BLOM Bank SAL

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45 CREDIT RISK (continued)

45.5 Maximum exposure to credit risk and collateral and other credit enhancements

The following table shows the maximum exposure to credit risk by class of financial asset. It further shows the total fair value of collateral, capped to the maximum exposure to which it relates and the net exposure to credit risk.

	2021							Associated ECL LL million
	Maximum exposure LL million	Cash LL million	Securities LL million	Letters of credit / guarantees LL million	Real estate LL million	Other LL million	Net credit exposure LL million	
Balances with central banks	24,863,190	-	2,342,765	-	-	-	22,520,425	1,885,897
Due from banks and financial institutions	677,137	-	4,041	-	-	-	673,096	34
Due from state banks	18,031	-	-	-	-	-	18,031	-
Derivative financial instruments	1,356	-	-	-	-	-	1,356	-
Financial assets at fair value through profit or loss	211,954	-	-	-	-	-	211,954	-
Net loans and advances to customers at amortized cost	2,347,022	108,128	952	13,049	1,493,171	567,552	164,170	829,097
Commercial loans	677,887	108,128	952	13,049	151,611	185,429	218,718	462,718
Consumer loans	1,669,135	-	-	-	1,341,560	382,123	(54,548)	366,379
Net loans and advances to related parties at amortized cost	5,364	-	740	-	3,776	-	848	15
Debtors by acceptances	479	-	-	-	-	-	479	72
Financial assets at fair value through other comprehensive income	3,238	-	-	-	-	-	3,238	-
Financial assets at amortized cost	5,018,332	-	-	-	-	-	5,018,332	39,069
	33,146,103	108,128	2,348,498	13,049	1,496,947	567,552	28,611,929	2,754,184
Financial guarantees							613,082	-
Non-financial guarantees							13,161,588	-
Documentary credits							30,527	-
							13,805,197	-

	2020							Associated ECL LL million
	Maximum exposure LL million	Cash LL million	Securities LL million	Letters of credit / guarantees LL million	Real estate LL million	Other LL million	Net credit exposure LL million	
Balances with central banks	25,644,949	-	2,342,765	-	-	-	23,302,184	1,218,365
Due from banks and financial institutions	357,092	-	4,241	-	-	-	352,851	-
Due from state banks	43,185	-	-	-	-	-	43,185	-
Loans to banks and financial institutions	-	-	-	-	-	-	-	-
Derivative financial instruments	2	-	-	-	-	-	2	-
Financial assets at fair value through profit or loss	3,540	-	-	-	-	-	3,540	-
Net loans and advances to customers at amortized cost	2,577,884	137,284	18,765	24,463	2,125,230	733,536	538,606	821,322
Commercial loans	996,341	137,284	18,765	24,463	246,245	178,142	393,442	491,562
Consumer loans	2,579,543	-	-	-	1,878,985	555,394	145,164	162,760
Net loans and advances to related parties at amortized cost	5,302	-	86	-	4,296	-	920	4
Debtors by acceptances	2,611	-	-	-	-	-	2,611	168
Financial assets at fair value through other comprehensive income	3,211	-	-	-	-	-	3,211	-
Financial assets at amortized cost	4,950,148	-	-	-	-	-	4,950,148	39,580
	34,627,924	137,284	2,365,857	24,063	2,129,526	733,536	29,237,258	2,115,439
Financial guarantees							588,866	-
Non-financial guarantees							12,196,319	-
Documentary credits							50,615	-
							12,835,873	-

The schedules shown above exclude the undrawn commitments to lend of LL 400,641 million for the year ended 31 December 2021 (2020: LL 390,650 million).

Collateral and other credit enhancements

The amount and type of collateral required depends on an assessment of the credit risk of the counterparty. Guidelines are implemented regarding the acceptability of types of collateral and valuation parameters.

Management monitors the market value of collateral on a regular basis and requests additional collateral in accordance with the underlying agreement when deemed necessary.

45 CREDIT RISK (continued)

45.5 Maximum exposure to credit risk and collateral and other credit enhancements (continued)

Collateral and other credit enhancements (continued)

The main types of collateral obtained are as follows:

- *Securities*: the balances shown represent the fair value of the securities.
- *Letters of credit / guarantees*: The Bank holds in some cases guarantees, letters of credit and similar instruments from banks and financial institutions which enable it to claim settlement in the event of default on the part of the counterparty. The balances shown represent the notional amount of these types of guarantees held by the Bank.
- *Real estate (commercial and residential)*: The Bank holds in some cases a first degree mortgage over residential property (for housing loans) and commercial property (for commercial loans). The value shown reflects the fair value of the property limited to the related mortgaged amount.

In addition, the Bank also obtains guarantees from parent companies for loans to their subsidiaries, personal guarantees for loans to companies owned by individuals and assignments of insurance proceeds and revenues, which are not reflected in the above table.

46 MARKET RISK

Market risk is defined as the potential loss in both on balance sheet and off-balance sheet positions resulting from movements in market risk factors such as foreign exchange rates, interest rates and equity prices.

Bank Risk Management is responsible for generating internal reports quantifying the Bank's earnings at risk due to extreme movements in interest rates, while daily monitoring the sensitivity of the Bank's trading portfolio of fixed income securities to changes in market prices and / or market parameters. The Bank's Asset and Liability Management (ALM) policy assigns authority for its formulation, revision and administration to the Asset / Liability Committee (ALCO) of BLOM Bank SAL. Bank Risk Management is responsible for monitoring compliance with all limits set in the ALM Policy ranging from core foreign currency liquidity to liquidity mismatch limits to interest sensitivity gap limits. The Bank has an Asset and Liability Management system "Focus ALM" that automates the risk measurement of the Bank's assets and liabilities including stress testing and extensive scenario analysis.

A. CURRENCY RISK

Foreign exchange (or currency) risk is the risk that the value of a portfolio will fall as a result of changes in foreign exchange rates. The major sources of this type of market risk are imperfect correlations in the movements of currency prices, fluctuations in interest rates and exchange rate volatility in general. The Bank is subject to currency risk on financial assets and liabilities that are denominated in currencies other than the Lebanese Lira. Most of these financial assets and liabilities are in US Dollars and Euros.

As disclosed in note 1, the Bank's assets and liabilities in foreign currencies are valued at the official exchange rate. Due to the high volatility and the significant variance in exchange rates between the multiple currency market, this does not always represent a reasonable estimate of expected cash flows in Lebanese Liras that would have to be generated/used from the realisation of such assets or the payment of such liabilities at the date of the transaction or at the date of the separate financial statements. Management is unable to determine what would be a reasonable possible movement in order to provide useful quantitative sensitivity analysis. The impact of the valuation of these assets and liabilities at a different rate will be recognised in the separate financial statements once the change in the official exchange rate and /or a legal exchange mechanism is implemented by the Lebanese government.

46 MARKET RISK (continued)

A. CURRENCY RISK (continued)

The following tables present the breakdown of assets and liabilities by currency as of 31 December: Impairment allowances are reflected in the tables below in the currency in which they were recorded, which might differ from the original currency of the impaired asset.

	2021					Total LL million
	LL million	US Dollars in LL million	Euro in LL million	Other foreign currencies LL million	Total foreign currencies LL million	
<i>Foreign currencies in Lebanese Lira</i>						
ASSETS						
Cash and balances with central banks	7,024,539	16,759,617	1,956,193	57,747	18,773,557	25,798,096
Due from banks and financial institutions	38,088	570,894	15,640	52,515	639,049	677,137
Due from sister banks	18	9,789	5,200	3,024	18,013	18,031
Derivative financial instruments	1,356	-	-	-	-	1,356
Financial assets at fair value through profit or loss	15,657	260,483	189	-	260,442	276,299
Net loans and advances to customers at amortized cost	1,238,571	599,058	12,346	497,047	1,108,451	2,347,022
Net loans and advances to related parties at amortized cost	2,874	1,200	-	1,290	2,490	5,364
Debtors by acceptances	-	75	404	-	479	479
Financial assets at fair value through other comprehensive income	-	-	-	3,238	3,238	3,238
Financial assets at amortized cost	2,685,026	1,860,299	51	472,956	2,333,306	5,018,332
Investments in subsidiaries	417,004	166,911	516,062	4,356	687,329	1,104,333
Property, equipment and right-of-use assets	491,119	72	-	60,761	60,833	551,952
Intangible assets	273	72	-	476	548	821
Assets obtained in settlement of debt	(151)	36,792	-	9,034	45,826	45,675
Other assets	22,202	3,094	229	6,385	9,708	31,910
TOTAL ASSETS	11,936,576	10,269,356	2,506,284	1,168,829	23,943,469	35,880,045
LIABILITIES						
Due to central banks	2,683,377	53,303	-	131,192	184,495	2,867,872
Due to banks and financial institutions	-	89,109	2,325	90,769	182,203	185,614
Due to sister banks	31,011	96,504	11,084	8,863	116,451	147,462
Derivative financial instruments	1,366	-	-	-	-	1,366
Customers' deposits at amortized cost	3,932,842	20,413,428	1,464,518	955,762	22,333,708	26,766,550
Deposits from related parties at amortized cost	68,744	420,839	2,236	7,901	440,976	509,720
Debt issued and other borrowed funds	-	38,183	-	-	38,183	38,183
Engagements by acceptances	-	147	404	-	551	551
Other liabilities	601,221	82,986	2,420	8,476	93,882	695,103
Provisions for risks and charges	138,777	4,389	-	563	4,922	143,729
TOTAL LIABILITIES	7,460,749	21,208,888	1,482,987	1,203,526	23,995,401	31,356,150
NET EXPOSURE	4,475,827	(940,532)	1,023,297	(34,697)	48,068	4,523,895
<i>2020</i>						
<i>Foreign currencies in Lebanese Lira</i>						
	LL million	US Dollars in LL million	Euro in LL million	Other foreign currencies LL million	Total foreign currencies LL million	Total LL million
ASSETS						
Cash and balances with central banks	5,604,427	17,947,361	2,166,695	72,415	20,186,971	25,871,398
Due from banks and financial institutions	40,945	214,345	56,502	316,147	45,100	357,092
Due from sister banks	6,137	17,132	11,939	7,957	37,048	43,185
Derivative financial instruments	2	-	-	-	-	2
Financial assets at fair value through profit or loss	16,022	54,094	322	815	55,231	71,253
Net loans and advances to customers at amortized cost	1,623,292	1,332,274	26,387	595,931	1,954,992	3,577,864
Net loans and advances to related parties at amortized cost	3,020	835	-	1,447	2,282	5,302
Debtors by acceptances	-	1,740	871	-	2,611	2,611
Financial assets at fair value through other comprehensive income	-	-	-	3,211	3,211	3,211
Financial assets at amortized cost	2,782,822	1,831,638	55	275,633	2,207,326	4,990,148
Investments in subsidiaries	314,170	257,161	554,089	485,892	297,142	1,611,312
Property, equipment and right-of-use assets	502,951	230	-	62,103	62,330	565,281
Intangible assets	770	93	-	394	487	1,257
Assets obtained in settlement of debt	(157)	37,664	-	13,346	51,010	50,853
Other assets	23,294	888	1,466	5,042	7,396	30,690
TOTAL ASSETS	10,997,695	21,696,155	2,818,346	1,669,283	26,183,784	37,181,479
LIABILITIES						
Due to central banks	2,754,409	69,810	-	85,420	155,230	2,909,639
Due to banks and financial institutions	2,054	85,913	52,081	127,286	263,280	267,334
Due to sister banks	31,936	161,773	13,245	9,399	184,417	216,353
Derivative financial instruments	11	-	-	-	-	11
Customers' deposits at amortized cost	4,030,761	21,252,997	1,607,764	992,783	23,853,544	27,884,305
Deposits from related parties at amortized cost	69,967	475,888	4,083	8,528	488,499	558,466
Debt issued and other borrowed funds	-	38,168	-	-	38,168	38,168
Engagements by acceptances	-	1,507	871	-	2,778	2,778
Other liabilities	137,179	120,575	2,928	9,788	139,291	670,470
Provisions for risks and charges	25,239	6,842	-	1,729	8,571	33,810
TOTAL LIABILITIES	7,451,356	22,213,873	1,680,972	1,234,933	25,129,778	32,581,334
NET EXPOSURE	3,546,339	(517,718)	1,137,374	434,350	1,054,006	4,600,145

46 MARKET RISK (continued)

A. CURRENCY RISK (continued)

The Bank's Exposure to Currency Risk

Assets and liabilities in foreign currencies presented in the tables above include onshore assets and liabilities in foreign currencies, that are subject to unofficial capital controls, which is further explained in note 1. These are held by entities operating in Lebanon and will be realized / settled without recourse to foreign currency cash and / or foreign bank accounts outside Lebanon ("fresh funds"). Hence these cannot be perceived to have an economic value equivalent to that of offshore foreign currency assets and liabilities and should be viewed and managed separately.

Following the Central Bank of Lebanon Intermediate Circular number 600, dated November 2021, provisioning on Central Bank US\$ exposure are to be recorded in the currency of the exposure which is in foreign currency. This has led to the creation of a significant FX short open position of around US\$ 936 Million for BLOM Bank SAL by 31 December 2021. As at 31 December 2021, the ECL foreign currency coverage for the Central Bank of Lebanon (including CDs) was recorded at 8.69% (although this is predominantly with LL provisions for US\$ exposure converted at the current official exchange rate).

B. INTEREST RATE RISK

Interest rate risk arises from the possibility that changes in interest rates will affect the fair values of the financial instruments. The Bank is exposed to interest rate risk as a result of mismatches of interest rate re-pricing of assets and liabilities that mature or are re-priced in a given period. The Bank manages the risk by matching the re-pricing of assets and liabilities through risk management strategies. Positions are monitored on a daily basis by management.

Interest rate sensitivity

The table below shows the sensitivity of interest income to basis points changes in interest rates, all other variables held constant. Given the novel and prolonged nature of current economic crisis and the high levels of uncertainties, interest rates moved markedly lower during 2021, a situation expected to continue in 2022. The Central Bank of Lebanon has already decreased interest rates through issuance of Intermediary Circulars 536 and 544 (refer to note 1). The Bank is unable to determine what would be a reasonable possible change in interest rates; however, the Bank has a sensitivity analysis based on a decrease in 100 basis points.

The impact of interest rate changes on net interest income is due to assumed changes in interest paid and received on floating rate financial assets and liabilities and to the reinvestment or refunding of fixed rate financial assets and liabilities at the assumed rates. The result includes the effect of hedging instruments and assets and liabilities held at 31 December 2021 and 2020.

The change in interest income is calculated over a 1-year period. The impact also incorporates the fact that some monetary items do not immediately respond to changes in interest rates and are not passed through in full, reflecting sticky interest rate behaviour. The pass-through rate and lag in response time are estimated based on historical statistical analysis and are reflected in the outcome.

The sensitivity of equity was calculated for a decrease in basis points whereby a similar decrease has an equal and offsetting effect on net interest income.

	<i>Decrease in Basis Points</i>	<i>Sensitivity of Net Interest Income</i>	
		<i>2021</i>	<i>2020</i>
		<i>LL million</i>	<i>LL million</i>
Lebanese Lira	(100)	9,140	5,230
United States Dollar	(100)	55,781	55,878
Euro	(100)	6,486	7,364

BLOM Bank SAL

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46 MARKET RISK (continued)

B. INTEREST RATE RISK (continued)

Interest sensitivity gap

The Bank's interest sensitivity position based on contractual repricing arrangements is shown in the table below. The expected repricing and maturity dates may differ significantly from the contractual dates, particularly with regard to the maturity of customer demand deposits.

	2021							Total LL million
	Up to 1 month LL million	1 to 3 months LL million	3 months to 1 year LL million	(1 - 3) years LL million	(2 - 5) years LL million	More than 5 years LL million	Non-interest sensitive LL million	
ASSETS								
Cash and balances with central banks	1,468,495	1,263,285	1,072,316	1,131,201	2,601,136	17,224,913	1,046,740	35,798,096
Due from banks and financial institutions	345,696	263,375	-	-	-	-	245,066	677,137
Due from sister banks	-	259	-	-	-	-	17,791	18,031
Derivative financial instruments	-	-	-	-	-	-	1,355	1,355
Financial assets at fair value through profit or loss	-	-	-	-	119,299	50,243	65,766	276,299
Net loans and advances to customers at amortized cost	778,810	335,719	958,932	155,116	65,797	1,097	(46,639)	2,317,022
Net loans and advances to related parties at amortized cost	1,656	-	-	-	-	-	3,733	5,364
Debitions by acceptances	-	-	-	-	-	-	-	479
Financial assets at fair value through other comprehensive income	-	-	-	-	-	-	3,224	3,224
Financial assets at amortized cost	275,947	73,179	1,251,521	738,268	1,395,565	1,244,429	38,473	5,018,332
TOTAL	3,869,784	1,738,758	3,280,789	2,115,585	4,182,788	18,564,405	1,373,245	34,145,354
LIABILITIES								
Due to central banks	26,523	16,985	716,140	534,904	861,855	605,744	64,809	2,867,872
Due to banks and financial institutions	15,948	31,893	-	19,791	-	-	117,982	185,614
Due to sister banks	120,558	-	-	-	-	-	26,914	147,462
Derivative financial instruments	-	-	-	-	-	-	1,166	1,166
Customers' deposits at amortized cost	8,163,961	942,046	474,109	(144,874)	-	-	37,331,108	26,765,559
Deposits from related parties at amortized cost	312,771	441	42,534	153,974	-	-	-	509,720
Debt issued and other borrowed funds	-	-	-	37,688	-	-	-	38,183
Engagements by acceptances	-	-	-	-	-	-	-	551
TOTAL	8,649,361	991,285	1,262,983	601,483	861,855	606,744	17,543,207	30,517,318
Total interest rate sensitivity gap	(5,779,577)	747,473	2,017,806	1,514,102	3,320,933	17,957,661	(36,169,962)	3,628,036

	2020							Total LL million
	Up to 1 month LL million	1 to 3 months LL million	3 months to 1 year LL million	(1 - 3) years LL million	(2 - 5) years LL million	More than 5 years LL million	Non-interest sensitive LL million	
ASSETS								
Cash and balances with central banks	2,196,777	2,009,498	72,197	567,873	1,670,053	17,581,116	(276,118)	25,871,398
Due from banks and financial institutions	34,784	-	-	-	-	-	322,208	157,092
Due from sister banks	3,105	-	-	-	-	-	40,080	43,185
Derivative financial instruments	-	-	-	-	-	-	2	2
Financial assets at fair value through profit or loss	-	-	-	-	459	3,015	67,779	71,253
Net loans and advances to customers at amortized cost	954,263	449,121	1,255,637	398,688	140,957	4,725	374,193	3,577,864
Net loans and advances to related parties at amortized cost	1,172	-	-	-	-	-	(4)	5,202
Debitions by acceptances	-	-	-	-	-	-	2,641	2,641
Financial assets at fair value through other comprehensive income	-	-	-	-	-	-	3,211	3,211
Financial assets at amortized cost	15,947	31,893	195,788	1,486,968	2,001,809	1,220,372	37,401	4,990,148
TOTAL	3,306,045	2,490,512	1,523,592	2,453,514	3,763,278	18,813,362	571,763	34,922,086
LIABILITIES								
Due to central banks	54,339	21,847	29,051	713,207	1,388,522	637,191	65,882	2,910,159
Due to banks and financial institutions	64,670	46,243	-	-	-	-	136,421	267,334
Due to sister banks	113,758	-	-	-	-	-	102,595	216,253
Derivative financial instruments	-	-	-	-	-	-	11	11
Customers' deposits at amortized cost	14,830,261	1,405,858	1,139,164	5,858	-	-	10,502,964	27,884,365
Deposits from related parties at amortized cost	422,829	18,275	117,062	-	-	-	-	588,666
Debt issued and other borrowed funds	-	-	-	-	37,688	-	-	38,183
Engagements by acceptances	-	-	-	-	-	-	2,778	2,778
TOTAL	15,485,857	1,491,823	1,285,777	719,065	1,426,710	637,191	10,831,131	31,877,054
Total interest rate sensitivity gap	(12,179,809)	998,689	237,815	1,734,449	2,336,568	18,176,171	(10,259,368)	3,045,032

C. EQUITY PRICE RISK

Equity price risk is the risk that the fair value of equities decreases as the result of a change in stock prices. Equity price risk exposure arises from equity securities classified at fair value through profit or loss. A 5 percent increase in the value of the Bank's equities at 31 December 2021 would have increased net income by LL 1,233 million (2020: LL 1,371 million). An equivalent decrease would have resulted in an equivalent but opposite impact.

D. PREPAYMENT RISK

Prepayment risk is the risk that the Bank will incur a financial loss because its customers and counterparties repay or request repayment earlier than expected, such as housing loans when interest rates fall.

Market risks that lead to prepayments are not material with respect to the markets where the Bank operates. Accordingly, the Bank considers prepayment risk on net profits as not material after considering any penalties arising from prepayments.

47 LIQUIDITY RISK

Liquidity risk is defined as the risk that the Bank will encounter difficulty in meeting obligations associated with financial liabilities that are settled by delivering cash or another financial asset. Liquidity risk arises because of the possibility that the Bank might be unable to meet its payment obligations when they fall due under both normal and stress circumstances.

Monitoring process

Daily

Due to the economic crisis, it is more important to monitor cash flows and highly liquid assets rather than the supervisory liquidity ratios, because those will ensure the uninterrupted operation of the Bank's activities. On a daily basis, a report of highly liquid assets is prepared showing the change in the position compared to the previous day, and submits it to the members of the ALCO. Also, Bank Treasury monitors daily the inflows and outflows in the main currencies used by the Bank.

Weekly

A weekly report is prepared showing the expected outflows for the current and next quarter as well as of highly liquid assets held during the reported periods. This report is submitted to the Central Bank of Lebanon.

Monthly

The Bank Market Risk Management prepares tables indicating compliance with internal and regulatory liquidity ratios, for all banking units and for the Bank and submits them to the ALCO.

Quarterly

The Board of Directors is informed of compliance with internal and regulatory liquidity ratios for each banking unit and for the Bank on at least a quarterly basis.

Periodic

The liquidity position is assessed under various scenarios, including simulation of Bank-specific crisis and market-wide crisis. The stress scenarios are applied to both on-balance sheet and off-balance sheet commitments, to provide a complete picture of potential cash outflows.

As part of the Bank's procedures for monitoring and managing liquidity risk, there is a Bank funding crisis contingency plan, which sets out a response in the event of liquidity difficulties.

The plan sets out a series of possible actions that can be taken. This plan, as well as the Bank's Liquidity Policy, are reviewed by ALCO. The latter submits the updated policy with its recommendations to the Board Risk Committee for approval.

As per applicable regulations, the Bank must retain obligatory reserves with the central banks where the Bank entities operate.

Liquidity ratios

The liquidity position is assessed and managed under a variety of scenarios, giving due consideration to stress factors relating to both the market in general and specifically to the Bank. The ratio of FC liquid assets to FC total deposits and other liabilities falling due in the next month is prepared monthly by GMRM and monitored by ALCO. FC liquid assets are defined as FC bonds and placements with banks and subsidiaries maturing within thirty days.

The Central Bank of Lebanon, through its Basic circular 154 dated 27 August 2020, issued various requirements aiming at restoring the normal banking operations in Lebanon to their pre-October 2019 levels. Among these requirements, Lebanese banks were requested to maintain total current account balance with foreign correspondent banks (international liquidity that is free of any obligation) in excess of 3% of the bank's total foreign currency deposits as at 31 July 2020 by 28 February 2021. On 24 December 2020, the Banking Control Commission of Lebanon issued memo 18/2020 that contains guidance for the calculation of this ratio.

47 LIQUIDITY RISK (continued)

Sources of funding

Customer deposits were the main funding source of the Bank as at 31 December 2021 and 2020. The distribution of sources and the maturity of deposits are actively monitored in order to avoid concentration of funding maturing at any point in time or from a large number of depositors. The Bank monitors the percentage of time deposits that are renewed every quarter and aims to ensure that this percentage is maintained at high levels.

The Bank stresses the importance of customers' deposits as sources of funds to finance its lending activities. This is monitored by using the advances to deposit ratio, which compares loans and advances to customers as a percentage of clients' deposits.

	<i>Lebanese Lira</i>		<i>Foreign currencies</i>	
	2021 %	2020 %	2021 %	2020 %
Loans to deposits ratio				
Year-end	31.02	39.66	4.77	8.03
Average	35.54	37.51	5.75	10.53
Maximum	38.77	39.66	6.88	13.22
Minimum	31.02	36.54	4.77	8.03

Analysis of financial assets and liabilities by remaining contractual maturities

The table below summarizes the maturity profile of the Bank's financial assets and liabilities as at 31 December based on their contractual undiscounted cash flows. The contractual maturities were determined based on the period remaining to each maturity as per the statement of financial position actual commitments. Repayments which are subject to notice are treated as if notice were being given immediately. Concerning deposits, the Bank expects that many customers will not request repayment on the earliest date the Bank could be required to pay.

The table does not reflect the expected cash flows indicated by the Bank's deposit retention history.

	31 December 2021					Total LL million
	On demand LL million	Less than 3 months LL million	3 to 12 months LL million	1 to 5 years LL million	Over 5 years LL million	
Financial assets						
Cash and balances with central banks	2,433,987	2,093,940	761,198	10,588,843	23,254,658	39,132,626
Due from banks and financial institutions	240,478	436,725	-	-	-	677,203
Due from sister banks	17,780	251	-	-	-	18,031
Derivative financial instruments	-	1,356	-	-	-	1,356
Financial assets at fair value through profit or loss	-	3,929	5,516	143,532	131,535	284,512
Net loans and advances to customers at amortized cost	-	884,091	850,006	483,109	327,822	2,545,028
Net loans and advances to related parties at amortized cost	-	1,772	146	858	3,883	6,659
Debtors by acceptances	-	84	395	-	-	479
Financial assets at fair value through other comprehensive income	-	-	-	-	3,238	3,238
Financial assets classified at amortized cost	-	472,967	1,447,794	2,674,678	1,499,678	6,095,117
Total undiscounted financial assets	2,692,245	3,895,115	3,065,055	13,891,020	25,220,814	48,764,249
Financial liabilities						
Due to central banks	-	109,036	815,380	1,452,429	627,141	3,003,986
Due to banks and financial institutions	117,212	16,771	1,414	52,532	-	187,929
Due to sister banks	26,893	120,581	-	-	-	147,474
Derivative financial instruments	-	1,366	-	-	-	1,366
Customers' deposits at amortized cost	9,560,212	16,077,111	1,059,415	90,185	18	26,786,941
Deposits from related parties at amortized cost	-	313,496	43,067	154,582	-	511,145
Debt issued and other borrowed funds	-	706	2,118	39,195	-	42,019
Engagements by acceptances	-	84	467	-	-	551
Total undiscounted financial liabilities	9,704,317	16,639,151	1,921,861	1,788,923	627,159	30,681,411
Net undiscounted financial assets (liabilities)	(7,012,072)	(12,744,036)	1,143,194	12,102,097	24,593,655	18,082,838

47 LIQUIDITY RISK (continued)

Analysis of financial assets and liabilities by remaining contractual maturities (continued)

	31 December 2020					Total LL million
	On demand LL million	Less than 3 months LL million	3 to 12 months LL million	1 to 5 years LL million	Over 5 years LL million	
Financial assets						
Cash and balances with central banks	459,769	2,218,014	349,329	13,005,776	25,136,904	41,169,792
Due from banks and financial institutions	319,777	37,321	-	-	-	357,098
Due from sister banks	40,079	3,106	-	-	-	43,185
Derivative financial instruments	-	2	-	-	-	2
Financial assets at fair value through profit or loss	-	121	168	1,339	43,364	44,992
Net loans and advances to customers at amortized cost	-	1,218,981	1,252,510	804,005	725,105	4,000,601
Net loans and advances to related parties at amortized cost	-	1,243	188	1,024	4,390	6,845
Debtors by acceptances	-	2,669	(59)	-	-	2,610
Financial assets at fair value through other comprehensive income	-	-	-	-	3,211	3,211
Financial assets classified at amortized cost	-	174,522	424,763	4,200,444	1,557,463	6,357,192
Total undiscounted financial assets	819,625	3,655,979	2,026,899	18,012,588	27,470,437	51,985,528
Financial liabilities						
Due to central banks	-	125,721	91,325	2,195,196	682,846	3,095,088
Due to banks and financial institutions	155,239	102,010	11,066	-	-	268,315
Due to sister banks	102,566	113,833	-	-	-	216,399
Derivative financial instruments	-	11	-	-	-	11
Customers' deposits at amortized cost	7,710,489	17,546,509	2,282,501	455,524	39	27,995,062
Deposits from related parties at amortized cost	-	196,544	187,392	190,533	-	574,469
Debt issued and other borrowed funds	-	706	2,118	42,042	-	44,866
Engagements by acceptances	-	2,670	108	-	-	2,778
Total undiscounted financial liabilities	7,968,294	18,088,004	2,574,510	2,883,295	682,885	32,196,988
Net undiscounted financial assets (liabilities)	(7,148,669)	(14,432,025)	(547,611)	(5,129,293)	26,787,552	19,788,540

The table below shows the contractual expiry by maturity of the Bank's contingent liabilities and commitments. Each undrawn loan commitment is included in the time band containing the earliest date it can be drawn down. For issued financial guarantee contracts, the maximum amount of the guarantee is allocated to the earliest period in which the guarantee could be called.

	31 December 2021					Total LL million
	On demand LL million	Less than 3 months LL million	3 to 12 months LL million	1 to 5 years LL million	Over 5 years LL million	
Financial guarantees	186,409	-	-	-	-	186,409
Documentary credits	-	6,744	-	-	-	6,744
Loan commitments	-	400,641	-	-	-	400,641
Other commitments	-	100,793	1,199,992	726,951	415,822	2,443,558
Total	186,409	508,178	1,199,992	726,951	415,822	3,037,352

	31 December 2020					Total LL million
	On demand LL million	Less than 3 months LL million	3 to 12 months LL million	1 to 5 years LL million	Over 5 years LL million	
Financial guarantees	232,779	-	-	-	-	232,779
Documentary credits	-	4,170	-	-	-	4,170
Loan commitments	-	390,650	-	-	-	390,650
Other commitments	-	121,430	-	1,253,855	1,088,910	2,464,195
Total	232,779	516,250	-	1,253,855	1,088,910	3,091,794

48 OPERATIONAL RISK

Operational risk is defined as the risk of loss or damage resulting from inadequate or failed internal processes, people, systems or external events. The Basel definition of operational risk includes legal risk, and excludes reputational and strategic risks. Still, the failure of operational risk controls may result in reputational damage, business disruptions, business loss, or non-compliance with laws and regulations that can lead to significant financial losses. Therefore, reputational and strategic risks are indirectly mitigated once the operational risks acting as their key drivers are well managed.

The operational risk management framework is implemented by an independent operational risk management department that operates in coordination with other support functions such as: Corporate Information Security and Compliance. The Internal Audit provides an independent assurance on the adequacy and effectiveness of this framework through periodic reviews.

Operational risks are managed across the Bank based on a set of principles and standards detailed in the Board-approved operational risk management framework. These principles and standards include at a minimum: segregation of duties, four-eye principle, and independency of employees performing controls, reconciliations, awareness. Controls are also embedded within systems and formalized in policies and procedures.

Incidents are captured and analyzed to identify their root causes. Corrective and preventive measures are recommended to prevent future reoccurrences. Risk and Control Assessments (RCAs) are conducted on an ongoing basis to identify risks and control vulnerabilities associated to existing or new operations, products, processes, activities and systems. Key Risk Indicators are also developed continuously to detect alarming trends. Recommendations to improve the control environment are communicated to concerned parties and escalated to Management as deemed necessary.

Major incidents, RCA findings and operational losses are reported to the Board of Directors and Risk Committees periodically as per the governance framework set in the Bank Operational Risk policy.

Insurance coverage is used as an additional layer of mitigation and is commensurate with the Bank business activities, in terms of volume and nature.

49 LITIGATION RISK

Since 17 October 2019, the Bank has been subject to increased litigations in Lebanon and abroad, as a result of the restrictive measures adopted by Lebanese banks in relation to the withdrawal of funds and transfers abroad, as well as in relation to the repayment by customers of local foreign currency loans in Lebanese Liras. Management is carefully considering the impact of these existing litigation and claims against the Bank in relation to these restrictive measures. There are still uncertainties related to the consequences of these restrictive measures, based on the current available information and the prevailing laws and local banking practices, Management considers that the said claims seem unlikely to have a material adverse impact on the financial position and capital adequacy of the Bank, however due to recent development and the increasing trend in judgments ruled in favour of the plaintiffs during 2021, management considers that they may affect negatively the offshore liquidity of the Bank, its foreign assets and its foreign currency mismatch (refer to note 46). The amount cannot be determined presently. In addition, the Bank may, from time to time, become involved in other legal or arbitration proceedings which may affect its operations and results. Litigation risk arises from pending or potential legal claims against the Bank (note 41).

50 POLITICAL RISK

External factors which are beyond the control of the Bank, such as political developments and government actions in Lebanon (note 1) and other countries may adversely affect the operations of the Bank, its strategy and prospects. Other important political risk factors include government intervention on the Bank's activities and social developments in the countries in which the Bank operates, political developments in Lebanon, and the political and social unrest and political instability or military conflict in neighbouring countries and/or other overseas areas. Given the above, the Bank recognises that unforeseen political events can have negative effects on the fulfilment of contractual relationships and obligations of its customers and other counterparties which will result in significant impact on Bank's activities, operating results and position.

51 CAPITAL MANAGEMENT

The adequacy of the Group's capital is monitored using, among other measures, the rules and ratios established by the Basel Committee on Banking Supervision (BIS rules/ratios) as adopted by the Central Bank of Lebanon, which is the lead supervisor of the Group.

Central Bank of Lebanon's Intermediate circular 567, issued on 26 August 2020, introduced several key changes in the calculation of regulatory capital adequacy ratios. These changes include:

- Raising the regulatory expected credit loss level for Lebanese Government securities in foreign currency and Lebanese government-related exposures in same currency from 9.45% to 45%. Regulatory ECL for other exposures remain unchanged.

<i>Type of financial instrument</i>	<i>2021</i>	<i>2020</i>
Exposures to Central Bank of Lebanon in foreign currency	1.89%	1.89 %
Exposures to Central Bank of Lebanon in Lebanese Lira	0 %	0 %
Lebanese government securities in foreign currency	45 %	45 %
Lebanese government securities in Lebanese Lira	0 %	0 %

- Requesting banks to increase their own funds (capital) by an amount equivalent to 20% of their common equity tier one capital as of 31 December 2018, through issuing new foreign currency capital instruments, as well as other approaches that meet the criteria for inclusion as regulatory capital. The deadline for raising capital was initially set at 31 December 2020 but was later extended for the banking sector to 28 February 2021.

As disclosed in note 1, the Bank already submitted measures to the regulators for strengthening its standalone equity by 20% and fulfilled this regulatory requirement.

- Exceptionally during 2020 and 2021, allowing banks to draw down the 2.5% capital conservation buffer on condition of rebuilding it progressively starting 2022 by 0.75% each year, to reach the minimum required level of 2.5% by the end of 2024.

The Group did not draw down its capital conservation buffer as at 31 December 2021 and 2020.

- Prohibiting Lebanese banks from distributing dividends on common shares for the financial years 2019 and 2020, as well as prohibiting banks from distributing dividends if capital adequacy ratios drop below 7% for common equity tier 1, 10% for tier 1 and 12% for total capital (compared to the regulatory minimum limits of 7%, 8.5% and 10.5% respectively, including a 2.5% capital conservation buffer).

Exceptionally for 2020 and 2021, allowing Bank to include provisions for expected credit losses on stage 1 and 2 exposures, excluding those relating to Lebanese Sovereign and the Central Bank of Lebanon, under regulatory Common Equity Tier 1 (previously only stage 1 allowances were included in Tier 2 capital, subject to a 1.25% cap relative to Credit Risk Weighted Assets). Such provisions included under CET 1 should be amortized by 25% yearly starting end of year 2022.

As a result, the levels of Common Equity Tier 1 reported below increased by LL 194,049 million at 31 December 2020 and by LL 184,448 million at 31 December 2021, compared to the previous treatment.

51 CAPITAL MANAGEMENT (continued)

- In October 2020, BCC issued a memo 15/2020 requesting from Banks to develop a roadmap to ensure adherence to capital ratios and liquidity requirements, covering the years from 2020 to 2024. As per the memo, the below minimum capital adequacy ratios are applied:

Ratio (%)	2020	2021	2022	2023	2024
Minimum Capital Ratio (including the Capital Conservation Buffer)					
Common Equity Tier 1 / risk-weighted assets	4.50%	4.50%	5.25%	6.00%	7.00%
Net Tier 1 / risk-weighted assets	6.00%	6.00%	6.75%	7.50%	8.50%
Total capital / risk-weighted assets	8.00%	8.00%	8.75%	9.50%	10.50%
Provisions added to Capital equity Tier 1					
Provisions taken on Stage 1 and 2 assets and commitments except provisions taken against Lebanese Sovereign & Central Bank exposures, to be added to Common Equity Tier 1	100.00%	100.00%	75.00%	50.00%	25.00%

In 2021, BCC issued an intermediate circular number 595 whereby it has lowered the risk-weight to be applied on the Lebanese Corporate Resident Portfolio from 150% to 100%. The impact is minor on the Group's capital adequacy ratio.

The following table shows the applicable regulatory capital ratios for BLOM Bank SAL Group, including the conservation buffer:

	<i>Common Tier 1 Capital Ratio</i>	<i>Tier 1 Capital Ratio</i>	<i>Total Capital Ratio</i>
31 December 2021			
Minimum required capital ratios (including capital conservation buffer)	4.50%	6.00%	8.00%
31 December 2020			
Minimum required capital ratios (including capital conservation buffer)	4.50%	6.00%	8.00%
		<i>2021 LL million</i>	<i>2020 LL million</i>
Risk weighted assets:			
Credit risk		33,159,496	37,800,270
Market risk		2,867,421	1,624,652
Operational risk		3,006,933	2,907,574
Total risk weighted assets		<u>39,033,850</u>	<u>42,332,496</u>

The regulatory capital including net income for the year as of 31 December is as follows:

	<i>2021 LL million</i>	<i>2020 LL million</i>
Tier 1 capital	4,882,364	4,896,576
<i>Of which: common Tier 1</i>	4,880,777	4,895,107
Tier 2 capital	14,094	11,252
Total capital	<u>4,896,458</u>	<u>4,907,828</u>

51 CAPITAL MANAGEMENT (continued)

The capital adequacy ratio including net income for the year as of 31 December is as follows:

	<i>2021</i>	<i>2020</i>
Capital adequacy – Common Tier 1	12.50%	11.56%
Capital adequacy – Tier 1	12.50%	11.56%
Capital adequacy – Total capital	12.54%	11.59%

To note that BLOM Bank SAL consolidated figures for 2020 are inclusive of BLOM Bank Egypt SAE, whereas for 2021 the consolidated figures are after the conclusion of BLOM Bank Egypt SAE sale (thus it does not include the risk-weights of BLOM Bank Egypt SAE but includes the proceeds resulting from its sale) which partially explains the increase in CAR year-on-year. The CAR's increase was aided also by the higher provisions related to Lebanese foreign currency Central Bank exposure since risk-weighted assets are applied on net of provisions exposure.

The capital adequacy ratios as at 31 December 2021 and 2020 were calculated based on the recorded figures and do not take into consideration the adjustments that will result from the resolution of the uncertainties reflected in note 1. Due to the high levels of uncertainties, the lack of observable indicators, the high gap between the parallel market rates, the platform rate and the official exchange rate and the lack of visibility on the government's plans with respect to: (a) the high exposures of banks with the Central Bank of Lebanon, (b) the Lebanese Sovereign securities, and (c) the currency exchange mechanisms and currency exchange rates that will be applied, management is unable to estimate in a reasonable manner, the impact of these matters on its Group's capital adequacy. Management has concerns about the effects that the above matters will have on the equity of the Group and the recapitalization needs that will arise once the necessary adjustments are determined and recorded.

52 SUBSEQUENT EVENTS

On 10 March 2022, the Prosecutor of the Court of Appeal in Mount Lebanon issued a decision banning the Chairman of the Bank from travelling abroad. The decision was issued without charging the aforementioned party with any crime. On the 14th of March 2022, the same judge issued a decision to freeze the Bank's shares in companies owned by both the Bank and some members of the board of directors, in addition to the vehicles and properties owned by the Bank and some of the members of the board of directors. On the 1st of April 2022, the Judge lifted the travel ban imposed previously on the Chairman while he was outside Lebanon and to revisit the issue after he is back. Further outcome and consequences of the above mentioned can't be presently determined.