Joint Stock Company "Zaman-Bank" Financial Statements

Year ended 31 December 2011 Together with Independent Auditors' Report

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INDEPENDENT AUDITORS' REPORT

To the Shareholders and Board of Directors of Joint Stock Company "Zaman-Bank"

We have audited the accompanying financial statements of Joint Stock Company "Zaman-Bank" (hereafter referred to as "Bank"), which comprise the statement of financial position as at 31 December 2011, the statements of comprehensive income, of changes in equity and of cash flows for the year then ended, and a summary of significant accounting policies and other explanatory information.

Management's responsibility for the financial statements

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

Auditors' responsibility

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

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditors' judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

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

Opinion

In our opinion, the financial statements present fairly, in all material respects, the financial position of Joint Stock Company "Zaman-Bank" as at 31 December 2011, and its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards.

Statement of financial position

As of 31 December 2011

(In thousands of Kazakh tenge)

	Notes	2011	2010
Assets			
Cash and cash equivalents	5	514,255	575,211
Amounts due from credit institutions	6	14,680	542,463
Loans to customers	7	4,227,453	3,643,764
Property and equipment	8	11,357	8,830
Intangible assets	9	14,039	14,667
Other assets	14	20,365	10,994
Total assets		4,802,149	4,795,929
Liabilities			
Amounts due to customers	10	292,940	690,943
Deferred income tax liabilities	12	48,538	47,308
Provisions	13	102,353	112,470
Other liabilities	14	14,527	21,326
Subordinated loan	11	100,036	251,297
Total liabilities		558,394	1,123,344
Equity			
Share capital	15	3,266,250	3,015,000
Retained earnings		977,505	657,585
Total equity		4,243,755	3,672,585
Total equity and liabilities		4,802,149	4,795,929

Signed and authorised for release on behalf of the Management Board of the Bank

Gupalo Yelena A.

Chairwoman of the Management Board

Seitova Rimma S.

Chief Accountant

Statement of comprehensive income

For the year ended 31 December 2011

(In thousands of Kazakh tenge)

	Notes	2011	2010
Interest income			
Loans to customers		505,650	462,472
Amounts due from credit institutions		151	203
		505,801	462,675
Interest expense			
Amounts due to customers		(262)	(369)
Subordinated loan		(407)	(1,646)
		(669)	(2,015)
Net interest income		505,132	460,660
Allowance for loan impairment	7	(23,729)	(190,525)
Net interest income after allowance for loan impairment		481,403	270,135
Net fee and commission income	17	53,215	154,747
Initial recognition of gain on loans to customers, adjusted for losses on			
changes in future cash flows		37,968	_
Net gains from foreign currencies		16,608	23,625
Other income		60	2,330
Non-interest income		107,851	180,702
Personnel expenses	18	(91,820)	(81,735)
Other operating expenses	18	(107,654)	(97,767)
Other (provisions)/reversal	13	10,135	(46,726)
Non-interest expense		(189,339)	(226,228)
Profit before income tax expense		399,915	224,609
Income tax expense	12	(79,995)	(46,107)
Profit for the year		319,920	178,502
Other comprehensive income			
Total comprehensive income for the year		319,920	178,502

Signed and authorised for release on behalf of the Management Board of the Bank

Gupalo Yelena A. Chairwoman of the Management Board

Seitova Rimma S. Chief Accountant

Statement of changes in equity For the year ended 31 December 2011

(In thousands of Kazakh tenge)

	Share capital	Retained earnings	Total equity
31 December 2009	3,015,000	479,083	3,494,083
Total comprehensive income for the year	_	178,502	178,502
31 December 2010	3,015,000	657,585	3,672,585
Total comprehensive income for the year	_	319,920	319,920
Issue of share capital (Note 15)	251,250	_	251,250
31 December 2011	3,266,250	977,505	4,243,755

Signed and authorised for release on behalf of the Management Board of the Bank

Gupalo Yelena A.

Chairwoman of the Management Board

Seitova Rimma S.

Chief Accountant

Statement of cash flows

For the year ended 31 December 2011

(In thousands of Kazakh tenge)

	Notes	2011	2010
Cash flows from operating activities			
Interest received		486,202	461,893
Interest paid		(696)	(1,984)
Fees and commissions received		56,155	68,052
Fees and commissions paid		(2,311)	(2,190)
Realised gains less losses from dealing in foreign currencies		16,249	24,079
Other income received		60	_
Personnel expenses paid		(91,515)	(82,815)
Other operating expenses paid		(104,705)	(94,768)
Cash flows from operating activities before changes in operating			
assets and liabilities		359,421	372,267
Net (increase) / decrease in operating assets			
Amounts due from credit institutions		528,107	(452,686)
Loans to customers		(549,816)	(486,144)
Other assets		(6,186)	(743)
Net increase / (decrease) in operating liabilities		(20= 00=)	201010
Amounts due to customers		(397,987)	206,918
Other liabilities			4,430
Net cash flows used in operating activities before income tax		(66,443)	(355,958)
Income tax paid		(84,871)	(46,752)
Net cash used in operating activities		(151,314)	(402,710)
Cash flows from investing activities			
Purchase of property and equipment	8	(6,193)	(3,595)
Purchase of intangible assets	9	(3,449)	(9,635)
Net cash used in investing activities		(9,642)	(13,230)
Cash flows from financing activities		, ,	, ,
Proceeds from subordinated loan	11	100,000	251,250
Net cash from financing activities		100,000	251,250
Net decrease in cash and cash equivalents		(60,956)	(164,690)
Cash and cash equivalents, beginning	5	575,211	739,901
Cash and cash equivalents, ending	5	514,255	575,211
Such und tubi equition, onding		011,200	0,0,211
Non-cash transactions:			
Decrease in subordinated loan	11	(251,250)	_
Increase in share capital	11	251,250	_

In 2010 the Bank issued convertible subordinated loan payable. The conversion option was exercised by the lender in 2011(Note 11).

Signed and authorised for release on behalf of the Management Board of the Bank

Gupalo Yelena A.

Chairwoman of the Management Board

Seitova Rimma S.

Chief Accountant

1. Principal activities

Joint Stock Company "Zaman-Bank" (hereinafter - "the Bank") operates in the Republic of Kazakhstan since 1991. The Bank accepts deposits from the public and extends credits, transfers payments within Kazakhstan and abroad, exchanges currencies and provides other banking services to its commercial and retail customers in accordance with license No. 11 issued on 24 December 2007 by Committee on Regulation and Supervision of the financial market and financial organizations of the National Bank of the Republic of Kazakhstan (hereinafter - the "FMSC").

The Bank is a member of the deposit insurance system. The system operates under the Kazakhstan laws and regulations and is governed by Kazakhstan Fund of Guarantees Insurance. The insurance covers Bank's obligations to individual depositors for the amount of up to KZT 5,000 thousand for each individual in case of Bank's failure to meet its obligations and/or loss of the license.

The legal registered office of the Bank is located at 111A Mashhur Zhusup Street, Ekibastuz, 141206, the Republic of Kazakhstan.

As at 31 December 2011 and 2010, the following shareholders owned the issued shares:

Shareholder	2011 (%)	2010 (%)
Abguzhinov T.S	25.1	9.2
Abguzhinov A.T.	21.8	23.3
LLP «Alan-A»	9.2	20.0
LLP «Energotaktika»	8.8	9.5
LLP «Direkt»	7.3	7.9
LLP «Ekibastuzskiy regional Business-Center	6.2	6.7
Abguzhinov B.S.	5.9	6.4
LLP "Solteko Kazakhstan"	3.8	4.1
Kim R.S.	3.0	3.3
Other shareholders (individually holding less than 3%)	8.9	9.6
Total	100.0	100.0

As of 31 December 2011 members of the Board of Directors and Management Board controlled 865,560 shares (26.6%) (2010: 625,560 or 10.8%) of the Bank.

2. Basis of preparation

General

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

The financial statements have been prepared under the historical cost convention except as disclosed in the accounting policies below. These financial statements are presented in thousands of Kazakh tenge ("KZT").

Reclassification

The reclassification of intangible assets into separate line has been made to 2010 balances to conform to the 2011 presentation:

	As previously		
	reported	Reclassification	As adjusted
Property, equipment and intangible assets	23,497	_	
Property and equipment	_	8,830	8,830
Intangible assets	_	14,667	14,667

3. Summary of accounting policies

Changes in accounting policies

The Bank has adopted the following amended IFRS and new IFRIC Interpretations during the year. The principal effects of these changes are as follows:

IAS 24 "Related party disclosures" (Revised)

The revised IAS 24, issued in November 2009 and effective for annual periods beginning on or after 1 January 2011, simplifies the disclosure requirements for government-related entities and clarifies the definition of a related party. Previously, an entity controlled or significantly influenced by a government was required to disclose information about all transactions with other entities controlled or significantly influenced by the same government. The revised standard requires disclosure about these transactions only if they are individually or collectively significant. The amendment had no impact on the Bank's financial statements.

3. Summary of accounting policies (continued)

Changes in accounting policies (continued)

Amendments to IAS 32 "Financial instruments: Presentation": Classification of Rights Issues"

In October 2009, the IASB issued amendment to IAS 32. Entities shall apply that amendment for annual periods beginning on or after 1 February 2010. The amendment alters the definition of a financial liability in IAS 32 to classify rights issues and certain options or warrants as equity instruments. This is applicable if the rights are given pro rata to all of the existing owners of the same class of an entity's non-derivative equity instruments, in order to acquire a fixed number of the entity's own equity instruments for a fixed amount in any currency. The amendment had no impact on the Bank's financial statements.

IFRIC 19 "Extinguishing Financial Liabilities with Equity Instruments"

IFRIC Interpretation 19 was issued in November 2009 and is effective for annual periods beginning on or after 1 July 2010. The interpretation clarifies the accounting when the terms of a financial liability are renegotiated and result in the entity issuing equity instruments to a creditor to extinguish all or part of the financial liability. The Bank accounted for extinguishment of debt by issuance of equity instruments (Note 11).

Improvements to IFRSs

In May 2010 the IASB issued the third omnibus of amendments to its standards, primarily with a view to removing inconsistencies and clarifying wording. Most of the amendments are effective for annual periods beginning on or after 1 January 2011. There are separate transitional provisions for each standard. Amendments included in May 2010 "Improvements to IFRS" had impact on the accounting policies, financial position or performance of the Bank, as described below.

- IFRS 3 Business combinations: limits the scope of the measurement choices that only the components of NCI that are present ownership interests that entitle their holders to a proportionate share of the entity's net assets, in the event of liquidation, shall be measured either at fair value or at the present ownership instruments' proportionate share of the acquiree's identifiable net assets. The amendment had no impact on the Bank's financial statements.
- IFRS 7 Financial instruments: Disclosures; introduces the amendments to quantitative and credit risk disclosures. The additional requirements had minor impact as information is readily available.
- Other amendments to IFRS 1, IFRS 3, IAS 1, IAS 27, IAS 34 and IFRIC 13 will have no impact on the accounting policies, financial position or performance of the Bank.

The following amendments to standards and interpretations did not have any impact on the accounting policies, financial position or performance of the Bank:

- IFRS 1 First-time Adoption of International Financial Reporting Standards Limited Exemption from Comparative IFRS 7 Disclosures for First-time Adopters
- IFRIC 14 Prepayments of a Minimum Funding Requirement

Financial assets

Initial recognition

Financial assets in the scope of IAS 39 are classified as either financial assets at fair value through profit or loss, loans and receivables, held-to-maturity investments, or available-for-sale financial assets, as appropriate. When financial assets are recognised initially, they are measured at fair value, plus, in the case of investments not at fair value through profit or loss, directly attributable transaction costs. The Bank determines the classification of its financial assets upon initial recognition, and subsequently can reclassify financial assets in certain cases as described below.

Date of recognition

All regular way purchases and sales of financial assets are recognised on the trade date i.e. the date that the Bank commits to purchase the asset. Regular way purchases or sales are purchases or sales of financial assets that require delivery of assets within the period generally established by regulation or convention in the marketplace.

3. Summary of accounting policies (continued)

Financial assets (continued)

Day 1' profit

Where the transaction price in a non-active market is different to the fair value from other observable current market transactions in the same instrument or based on a valuation technique whose variables include only data from observable markets, the Bank immediately recognises the difference between the transaction price and fair value (a 'Day 1' profit) in the statement of comprehensive income. In cases where use is made of data which is not observable, the difference between the transaction price and model value is only recognised in the statement of comprehensive income when the inputs become observable, or when the instrument is derecognised.

Financial assets at fair value through profit or loss

Financial assets classified as held for trading are included in the category 'financial assets at fair value through profit or loss'. Financial assets are classified as held for trading if they are acquired for the purpose of selling in the near term. Derivatives are also classified as held for trading unless they are designated and effective hedging instruments. Gains or losses on financial assets held for trading are recognised in the statement of comprehensive income.

Held-to-maturity investments

Non-derivative financial assets with fixed or determinable payments and fixed maturity are classified as held-to-maturity when the Bank has the positive intention and ability to hold them to maturity. Investments intended to be held for an undefined period are not included in this classification. Held-to-maturity investments are subsequently measured at amortised cost. Gains and losses are recognised in the statement of comprehensive income when the investments are impaired, as well as through the amortisation process.

Loans and receivables

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. They are not entered into with the intention of immediate or short-term resale and are not classified as trading securities or designated as investment securities available-for-sale. Such assets are carried at amortised cost using the effective interest method. Gains and losses are recognised in the statement of comprehensive income when the loans and receivables are derecognised or impaired, as well as through the amortisation process.

Available-for-sale financial assets

Available-for-sale financial assets are those non-derivative financial assets that are designated as available-for-sale or are not classified in any of the three preceding categories. After initial recognition available-for sale financial assets are measured at fair value with gains or losses being recognised in other comprehensive income until the investment is derecognised or until the investment is determined to be impaired at which time the cumulative gain or loss previously reported in other comprehensive income is reclassified to the statement of comprehensive income. However, interest calculated using the effective interest method is recognised in the statement of comprehensive income.

Determination of fair value

The fair value for financial instruments traded in active market at the reporting date is based on their quoted market price or dealer price quotations (bid price for long positions and ask price for short positions), without any deduction for transaction costs.

For all other financial instruments not listed in an active market, the fair value is determined by using appropriate valuation techniques. Valuation techniques include net present value techniques, comparison to similar instruments for which market observable prices exist, options pricing models and other relevant valuation models.

Offsetting

Financial assets and liabilities are offset and the net amount is reported in the statement of financial position when there is a legally enforceable right to set off the recognised amounts and there is an intention to settle on a net basis, or to realise the asset and settle the liability simultaneously. This is not generally the case with master netting agreements, and the related assets and liabilities are presented gross in the statement of financial position.

3. Summary of accounting policies (continued)

Financial assets (continued)

Reclassification of financial assets

If a non-derivative financial asset classified as held for trading is no longer held for the purpose of selling in the near term, it may be reclassified out of the fair value through profit or loss category in one of the following cases:

- a financial asset that would have met the definition of loans and receivables above may be reclassified to loans and receivables category if the Bank has the intention and ability to hold it for the foreseeable future or until maturity;
- other financial assets may be reclassified to available for sale or held to maturity categories only in rare circumstances.

A financial asset classified as available for sale that would have met the definition of loans and receivables may be reclassified to loans and receivables category of the Bank has the intention and ability to hold it for the foreseeable future or until maturity.

Financial assets are reclassified at their fair value on the date of reclassification. Any gain or loss already recognized in profit or loss is not reversed. The fair value of the financial asset on the date of reclassification becomes its new cost or amortised cost, as applicable.

Cash and cash equivalents

Cash and cash equivalents consist of cash on hand, amounts due from the National Bank of the Republic of Kazakhstan that mature within ninety days of the date of origination and are free from contractual encumbrances.

Borrowings

Issued financial instruments or their components are classified as liabilities, 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 instruments. Such instruments include amounts due to customers and non-convertible subordinated loan. After initial recognition, borrowings are subsequently measured at amortised cost using the effective interest method. Gains and losses are recognised in the statement of comprehensive income when the borrowings are derecognised as well as through the amortisation process.

Leases

Operating - Bank as lessee

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

Impairment of financial assets

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

3. Summary of accounting policies (continued)

Impairment of financial assets (continued)

Amounts due from credit institutions and loans to customers

For amounts due from credit institutions and loans to customers carried at amortised cost, the Bank assesses individually whether objective evidence of impairment exists for financial assets.

If there is an objective evidence that an impairment loss has been incurred, the amount of the loss is measured as the difference between the assets' carrying amount and the present value of estimated future cash flows (excluding future expected credit losses that have not yet been incurred). The carrying amount of the asset is reduced through the use of an allowance account and the amount of the loss is recognised in the statement of comprehensive income. Interest income continues to be accrued on the reduced carrying amount based on the original effective interest rate of the asset. Loans together with the associated allowance are written off when there is no realistic prospect of future recovery and all collateral has been realised or has been transferred to the Bank. If, in a subsequent year, the amount of the estimated impairment loss increases or decreases because of an event occurring after the impairment was recognised, the previously recognised impairment loss is increased or reduced by adjusting the allowance account. If a future write-off is later recovered, the recovery is credited to the statement of comprehensive income.

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

Renegotiated loans

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

The accounting treatment of such restructuring is as follows:

- If the currency of the loan has been changed the old loan is derecognised and the new loan is recognised.
- If the loan restructuring is not caused by the financial difficulties of the borrower the Bank uses the same approach as for financial liabilities described below.
- If the loan restructuring is due to the financial difficulties of the borrower and the loan is impaired after restructuring, the Bank recognizes the difference between the present value of the new cash flows discounted using the original effective interest rate and the carrying amount before restructuring in the provision charges for the period. In case loan is not impaired after restructuring the Bank recalculates the effective interest rate.

Once the terms have been renegotiated, the loan is no longer considered past due. Management continuously reviews renegotiated loans to ensure that all criteria are met and that future payments are likely to occur. The loans continue to be subject to an individual or collective impairment assessment, calculated using the loan's original or current effective interest rate.

Derecognition of financial assets and liabilities

Financial assets

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

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

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

3. Summary of accounting policies (continued)

Derecognition of financial assets and liabilities (continued)

Financial assets (continued)

Where continuing involvement takes the form of a written and / or purchased option (including a cash-settled option or similar provision) on the transferred asset, the extent of the Bank's continuing involvement is the amount of the transferred asset that the Bank may repurchase, except that in the case of a written put option (including a cash-settled option or similar provision) on an asset measured at fair value, the extent of the Bank'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 derecognised when the obligation under the liability is discharged or cancelled or expires.

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

Financial guarantees

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

Any increase in the liability relating to financial guarantees is taken to the statement of comprehensive income. The premium received is recognised in the statement of comprehensive income on a straight-line basis over the life of the guarantee.

Taxation

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

Deferred tax assets and liabilities are calculated in respect of temporary differences using the liability method. Deferred income taxes are provided for all temporary differences arising between the tax bases of assets and liabilities and their carrying values for financial reporting purposes.

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

There are requirements on tax charges and payments regarding the business activity of the Bank in the Republic of Kazakhstan, where the Bank conducts the business. These taxes are reflected in the statement of comprehensive income as a part of operating expenses.

Property and equipment

Property and equipment are carried at cost, excluding the costs of day-to-day servicing, less accumulated depreciation and any accumulated impairment. Such cost includes the cost of replacing part of equipment when that cost is incurred if the recognition criteria are met.

The carrying values of property and equipment are reviewed for impairment when events or changes in circumstances indicate that the carrying value may not be recoverable.

Depreciation of an asset begins when it is available for use. Depreciation is calculated on a straight-line basis over the following estimated rates:

Computers and office equipment 20-50%
Other property
Land 00%

The asset's residual values, useful lives and methods are reviewed, and adjusted as appropriate, at each financial year-end.

Costs related to repairs and renewals are charged when incurred and included in other operating expenses, unless they qualify for capitalization.

3. Summary of accounting policies (continued)

Intangible assets

Intangible assets include computer software and licenses.

Intangible assets acquired separately are measured on initial recognition at cost. The cost of intangible assets acquired in a business combination is fair value as at the date of acquisition. Following initial recognition, intangible assets are carried at cost less any accumulated amortisation and any accumulated impairment losses. The useful lives of intangible assets are assessed to be finite. Intangible assets with finite lives are amortised over the useful economic lives of 3 to 5 years and assessed for impairment whenever there is an indication that the intangible asset may be impaired. Amortisation periods and methods for intangible assets with indefinite useful lives are reviewed at least at each financial year-end.

Provisions

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

Retirement and other employee benefit obligations

The Bank does not have any pension arrangements separate from the State pension system of the Republic of Kazakhstan, which requires current contributions by the employer calculated as a percentage of current gross salary payments; such expense is charged in the period the related salaries are earned. In addition, the Bank has no significant post-retirement benefits.

Share capital

Share capital

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

Dividends

Dividends are recognised as a liability and deducted from equity at the reporting date only if they are declared before or on the reporting date. Dividends are disclosed when they are proposed before the reporting date or proposed or declared after the reporting date but before the financial statements are authorised for issue.

Contingencies

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

Recognition of income and expenses

Revenue is recognized 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 recognized:

Interest and similar income and expense

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

3. Summary of accounting policies (continued)

Recognition of income and expenses (continued)

Interest and similar income and expense (continued)

Once the recorded value of a financial asset or a group of similar financial assets has been reduced due to an impairment loss, interest income continues to be recognised using the original effective interest rate applied to the new carrying amount

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 recognised as an adjustment to the effective interest rate on the loan.

• 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 recognised on completion of the underlying transaction. Fees or components of fees that are linked to a certain performance are recognised after fulfilling the corresponding criteria.

Foreign currency translation

The financial statements are presented in Kazakhstani Tenge, which is the Bank's functional and presentation currency. Transactions in foreign currencies are initially recorded in the functional currency, converted at the rate of exchange ruling at the date of the transaction. Monetary assets and liabilities denominated in foreign currencies are retranslated at the functional currency rate of exchange ruling at the reporting date. Gains and losses resulting from the translation of foreign currency transactions are recognised in the statement of comprehensive income as gains less losses from foreign currencies - translation differences. 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.

Differences between the contractual exchange rate of a transaction in a foreign currency and the Central Bank exchange rate on the date of the transaction are included in gains less losses from dealing in foreign currencies.

Below are listed exchange rates used by the Bank in preparation of the financial statements:

	31 December	
	2011	2010
KZT/USD	148.40	147.50
KZT/EUR	191.72	196.88
KZT/RUR	4.61	4.83

Future changes in accounting policies

Standards and interpretations issued but not yet effective

IFRS 9 "Financial Instruments"

In November 2009 and 2010 the IASB issued the first phase of IFRS 9 Financial instruments. This Standard will eventually replace IAS 39 Financial Instrument: Recognition and Measurement. IFRS 9 becomes effective for financial years beginning on or after 1 January 2013. The first phase of IFRS 9 introduces new requirements on classification and measurement of financial instruments. In particular, for subsequent measurement all financial assets are to be classified at amortised cost or at fair value through profit or loss with the irrevocable option for equity instruments not held for trading to be measured at fair value through other comprehensive income. For financial liabilities designated at fair value through profit or loss using fair value option IFRS 9 requires the amount of change in fair value attributable to changes in credit risk to be presented in other comprehensive income. The Bank now evaluates the impact of the adoption of new Standard and considers the initial application date.

3. Summary of accounting policies (continued)

Future changes in accounting policies (continued)

Standards and interpretations issued but not yet effective (continued)

IFRS 10 Consolidated Financial Statements

IFRS 10 establishes a single control model that applies to all entities including special purpose entities. The changes introduced by IFRS 10 will require management to exercise significant judgement to determine which entities are controlled, and therefore, are required to be consolidated by a parent, compared with the requirements that were in IAS 27.In addition IFRS 10 introduces specific application guidance for agency relationships. IFRS 10 replaces the portion of IAS 27 Consolidated and Separate Financial Statements that addresses the accounting for consolidated financial statements. It also includes the issues raised in SIC-12 Consolidation — Special Purpose Entities. It is effective for annual periods beginning on or after 1 January 2013. Earlier application is permitted. The Bank expects that these amendments will have no impact on the Bank's financial position.

IFRS 11 Joint Arrangements

IFRS 11 removes the option to account for jointly controlled entities (JCEs) using proportionate consolidation. Instead, JCEs that meet the definition of a joint venture must be accounted for using the equity method. IFRS 11 supersedes IAS 31 Interests in Joint Ventures and SIC-13 Jointly Controlled Entities—Non-monetary Contributions by Venturers and is effective for annual periods beginning on or after 1 January 2013. Earlier application is permitted. The Bank expects that these amendments will have no impact on the Bank's financial position.

IFRS 12 Disclosure of Interests in Other Entities

IFRS 12 includes all of the disclosures that were previously in IAS 27 related to consolidated financial statements, as well as all of the disclosures that were previously included in IAS 31 and IAS 28. These disclosures relate to an entity's interests in subsidiaries, joint arrangements, associates and structured entities. A number of new disclosures are also required. IFRS 12 is effective for annual periods beginning on or after 1 January 2013. Earlier application is permitted. Adoption of the standard will require new disclosures to be made in the financial statements of the Bank but will have no impact on its financial position or performance.

IFRS 13 Fair Value Measurement

IFRS 13 establishes a single source of guidance under IFRS for all fair value measurements. IFRS 13 does not change when an entity is required to use fair value, but rather provides guidance on how to measure fair value under IFRS when fair value is required or permitted. IFRS 13 is effective for annual periods beginning on or after 1 January 2013. Earlier application is permitted. The adoption of the IFRS 13 may have effect on the measurement of the Bank's assets and liabilities accounted for at fair value. Currently the Bank evaluates possible effect of the adoption of IFRS 13 on its financial position and performance.

IAS 27 Separate Financial Statements (as revised in 2011)

As a consequence of the new IFRS 10 and IFRS 12, what remains of IAS 27 is limited to accounting for subsidiaries, jointly controlled entities, and associates in separate financial statements. The amendment becomes effective for annual periods beginning on or after 1 January 2013. The Bank expects that these amendments will have no impact on the Bank's financial position.

IAS 28 Investments in Associates and Joint Ventures (as revised in 2011)

As a consequence of the new IFRS 11 and IFRS 12. IAS 28 has been renamed IAS 28 Investments in Associates and Joint Ventures, and describes the application of the equity method to investments in joint ventures in addition to associates. The amendment becomes effective for annual periods beginning on or after 1 January 2013. The Bank expects that these amendments will have no impact on the Bank's financial position.

Amendments to IFRS 7 "Financial Instruments: Disclosures"

The Amendments were issued in October 2010 and are effective for annual periods beginning on or after 1 July 2011. The amendment requires additional disclosure about financial assets that have been transferred but not derecognised to enable the user of the Bank's financial statements to understand the relationship with those assets that have not been derecognised and their associated liabilities. In addition, the amendment requires disclosures about continuing involvement in derecognised assets to enable the user to evaluate the nature of, and risks associated with, the entity's continuing involvement in those derecognised assets. The amendment affects disclosure only and has no impact on the Bank's financial position or performance.

3. Summary of accounting policies (continued)

Future changes in accounting policies (continued)

Standards and interpretations issued but not yet effective (continued)

Amendments to IAS 12 "Income Taxes" – Deferred tax: Recovery of underlying assets

In December 2010 the IASB issued amendments to IAS 12 effective for annual periods beginning on or after 1 January 2012. The amendment clarified the determination of deferred tax on investment property measured at fair value. The amendment introduces a rebuttable presumption that deferred tax on investment property measured using the fair value model in IAS 40 should be determined on the basis that its carrying amount will be recovered through sale. Furthermore, it introduces the requirement that deferred tax on non-depreciable assets that are measured using the revaluation model in IAS 16 always be measured on a sale basis of the asset. The Bank now evaluates the impact of the adoption of these amendments.

Amendments to IAS 19 Employee Benefits

The IASB has published amendments to IAS 19 Employee Benefits, effective for annual periods beginning on or after 1 January 2013, which proposes major changes to the accounting for employee benefits, including the removal of the option for deferred recognition of changes in pension plan assets and liabilities (known as the "corridor approach"). In addition, these amendments will limit the changes in the net pension asset (liability) recognised in profit or loss to net interest income (expense) and service costs. The Bank expects that these amendments will have no impact on the Bank's financial position.

Amendments to IAS 1 Changes to the Presentation of Other Comprehensive Income

The amendments to IAS 1 Presentation of Financial Statements, effective for annual periods beginning on or after 1 July 2012, change the grouping of items presented in other comprehensive income. Items that could be reclassified (or 'recycled') to profit or loss at a future point in time (for example, upon derecognition or settlement) would be presented separately from items that will never be reclassified. These amendments will change presentation in the statement of comprehensive income but will have no effect on its financial position and performance.

Amendment to IFRS 1 Severe Hyperinflation and Removal of Fixed Dates for First-time Adopters

These amendments to IFRS 1, effective for annual periods beginning on or after 1 July 2011, introduce a new deemed cost exemption for entities that have been subject to severe hyperinflation. The Bank expects that these amendments will have no impact on the Bank's financial position.

4. Significant accounting judgments and estimates

Estimation uncertainty

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

Fair value of financial instruments

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

Allowance for loan impairment

The Bank regularly reviews its loans and receivables to assess impairment. The Bank uses its experienced judgment to estimate the amount of any impairment loss in cases where a borrower is in financial difficulties and there are few available sources of historical data relating to similar borrowers. Similarly, the Bank estimates changes in future cash flows based on the observable data indicating that there has been an adverse change in the payment status of borrowers in a group, or national or local economic conditions that correlate with defaults on assets in the group. Management uses estimates based on historical loss experience for assets with credit risk characteristics and objective evidence of impairment similar to those in the group of loans and receivables. The Bank uses its experienced judgment to adjust observable data for a group of loans or receivables to reflect current circumstances.

4. Significant accounting judgments and estimates (continued)

Estimation uncertainty (continued)

Adequacy of provisions for guarantees issued

The Bank regularly reviews its exposures under guarantees and similar off balance sheet credit instruments issued. These instruments are assessed and provision made in a similar manner as for loans. The Bank uses its experienced judgment to adjust the provisions against guarantees issued based on probability of outflow of resources required to settle the obligation under the guarantee.

5. Cash and cash equivalents

Cash and cash equivalents comprise:

	2011	2010
Cash on hand	37,457	21,962
Current accounts with the National Bank of the Republic of Kazakhstan	468,704	542,880
Obligatory reserve with the National Bank of the Republic of Kazakhstan	8,094	10,369
Cash and cash equivalents	514,255	575,211

The Bank is required to maintain a non-interest earning cash deposit (obligatory reserve) with the National Bank of the Republic of Kazakhstan, the amount of which depends on the level of funds attracted by the Bank. These reserves are not restricted.

6. Amounts due from credit institutions

Amounts due from credit institutions comprise:

	2011	2010
Time deposits with initial maturity over 90 days	14,680	542,463
Amounts due from credit institutions	14,680	542,463

During 2011, the Bank placed deposits with Kazakhstan and CIS banks in various currencies. As of 31 December 2011, deposit amounted to KZT 13,189 thousand (2010: KZT 537,182 thousand) was placed on correspondent account with recognized CIS bank and KZT 1,491 thousand (2010: KZT 5,237 thousand) was placed on correspondent account with internationally recognized OECD bank.

7. Loans to customers

Loans to customers comprise:

	<i>2011</i>	2010
Corporate lending	3,931,866	3,376,167
Individual entrepreneurs	512,573	417,760
Small business lending	41,868	61,456
Consumer lending	25,460	19,529
Residential mortgages	9,431	10,921
Gross loans to customers	4,521,198	3,885,833
Less – Allowance for impairment	(293,745)	(242,069)
Loans to customers	4,227,453	3,643,764

7. Loans to customers (continued)

Allowance for impairment of loans to customers

A reconciliation of the allowance for impairment of loans to customers by class is as follows:

			Small			
	Corporate	Individual	business	Consumer	Residential	
	lending	entreprene	lending	lending	mortgages	Total
	2011	urs 2011	2011	2011	2011	2011
At 1 January 2011	165,394	60,860	15,691	47	77	242,069
Charge /(reversal) for the year	31,049	(7,899)	(744)	1400	(77)	23,729
Recoveries	21,353	4,791	1,803	_	_	27,947
At 31 December 2011	217,796	57,752	16,750	1,447	-	293,745
_						
Individual impairment	217,796	57,752	16,750	1,447	_	293,745
Gross amount of loans, individually determined to be impaired, before deducting any individually assessed						
impairment allowance	1,277,290	60,141	16,966	4,547	_	1,358,944
- -						

			Small			
	Corporate	Individual	business	Consumer	Residential	
	lending	entreprene	lending	lending	mortgages	Total
	2010	urs 2010	2010	2010	2010	2010
At 1 January 2010	57,562	21,181	5,460	17	27	84,247
Charge for the year	130,177	47,902	12,350	35	61	190,525
Amortization of discount	(2,711)	(998)	(258)	_	_	(3,967)
Amounts written off	(19,634)	(7,225)	(1,861)	(5)	(11)	(28,736)
At 31 December 2010	165,394	60,860	15,691	47	77	242,069
Individual impairment	165,394	60,860	15,691	47	77	242,069
Gross amount of loans, individually determined to be impaired, before deducting any individually assessed						
impairment allowance	1,303,554	71,852	17,449	4,677	77	1,397,609
=						

Interest income accrued on loans, for which impairment allowances have been recognized, for the year ended 31 December 2011, comprised KZT 32,709 thousand (2010 – KZT 21,145 thousand).

Collateral and other credit enhancements

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

The main types of collateral obtained are as follows:

- For commercial lending, charges over real estate properties, inventory and other,
- For retail lending, mortgages over residential properties.

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

7. Loans to customers (continued)

Concentration of loans to customers

As of 31 December 2011, the Bank had a concentration of loans represented by KZT 3,640,415 thousands due from the ten largest third party borrowers (81% of gross loan portfolio) (2010: KZT 2,360,645 thousands, 69% of gross loan portfolio). An allowance of KZT 49,911 thousands (2010: KZT 44,234 thousands) was recognized against these loans.

Loans have been extended to the following types of customers:

	2011	2010
Private companies	3,739,181	3,223,475
Individual entrepreneurs	454,821	391,736
Individuals	33,451	28,553
Loans to customers	4,227,453	3,643,764

Loans are made principally within Kazakhstan in the following industry sectors:

	2011	2010
Trading enterprises	2,368,291	2,621,128
Coal mining	777,417	282,179
Individuals	488,272	420,289
Agriculture and food processing	226,993	14,066
Services	205,566	9,378
Metal products manufacturing	91,165	138,308
Machine-building	36,320	_
Transport	15,598	23,510
Construction and maintenance	3,151	8,569
Wooden goods manufacturing	_	74,142
Other	14,680	52,195
Loans to customers	4,227,453	3,643,764

8. Property and equipment

The movements in property and equipment were as follows:

		Computers and office		
	Land	equipments	Furniture	Total
Cost		1 1		
31 December 2009	_	5,147	11,113	16,260
Additions	_	1,258	2,337	3,595
Disposals	_	(1,355)	(801)	(2,156)
31 December 2010	_	5,050	12,649	17,699
Additions	3,975	1,237	981	6,193
Disposals	_	(1,864)	(960)	(2,824)
31 December 2011	3,975	4,423	12,670	21,068
Accumulated depreciation				
31 December 2009	_	2,747	4,501	7,248
Depreciation charge	_	1,325	2,336	3,661
Disposals	_	(1,239)	(801)	(2,040)
31 December 2010	_	2,833	6,036	8,869
Depreciation charge	_	1,301	2,365	3,666
Disposals	-	(1,864)	(960)	(2,824)
31 December 2011	_	2,270	7,441	9,711
Net book value:				
31 December 2009	_	2,400	6,612	9,012
31 December 2010	_	2,217	6,613	8,830
31 December 2011	3,975	2,153	5,229	11,357

9. Intangible assets

The movements in intangible assets were as follows:

	Computer software and licenses
Cost	
31 December 2009	17,625
Additions	9,635
Disposals	(235)
31 December 2010	27,025
Additions	3,449
Disposals	(1,031)
31 December 2011	29,443
Accumulated amortisation	
31 December 2009	10,069
Depreciation charge	2,524
Disposals	(235)
31 December 2010	12,358
Depreciation charge	4,077
Disposals	(1,031)
31 December 2011	15,404
Net book value:	
31 December 2009	7,556
31 December 2010	14,667
31 December 2011	14,039

10. Amounts due to customers

The amounts due to customers include the following:

	2011	2010
Current accounts	229,883	654,816
Time deposits	63,057	36,127
Amounts due to customers	292,940	690,943
Held as security against guarantees	12,178	5,345

At 31 December 2011, amounts due to customers of KZT 198,913 thousand (87%) were due to the ten largest customers $(2010-KZT\ 638,025\ thousand\ (97\%))$.

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

	2011	2010
Private enterprises	243,226	673,915
Employees	49,627	11,667
Other	87	5,361
Amounts due to customers	292,940	690,943

An analysis of customer accounts by economic sector follows:

	2011	2010
Trade	63,168	49,908
Fuel	59,391	568,656
Machine building	55,737	41,653
Individuals	49,627	11,683
Agriculture	18,777	1,008
Manufacturing	10,888	1,202
Real estate construction	9,684	14,804
Transport and communication	3,952	216
Other	21,716	1,813
Amounts due to customers	292,940	690,943

11. Subordinated loan

On 28 December 2011, the Bank secured KZT 100,000 thousand subordinated loan facility from Razrez Vskrishnoi LLP with an interest rate of 6.5% p.a. and a tenor of 7 years. The facility is unsecured and can be redeemed at face value prior to contractual maturity date.

As at 31 December 2010, the Bank had KZT 251,250 thousand subordinated loan facility from shareholders. The loan was convertible to the Bank's ordinary shares at discretion of the borrower before specified maturity date at an agreed upon exercise price of KZT 1,005. In February 2011, the Bank had exercised its option and converted the debt outstanding by delivering 250,000 of the Bank's ordinary shares thereby extinguishing its obligation to the shareholders.

12. Taxation

The corporate income tax expense comprises:

	2011	2010
Current tax charge	78,765	48,178
Deferred tax charge (credit) – origination and reversal of temporary differences	1,230	(2,071)
Income tax expense	79,995	46,107

Kazakhstani legal entities have to file individual corporate income tax declarations. Standard corporate income tax rate comprised 20% for 2011 and 2010. The effective income tax rate differs from the statutory income tax rates. A reconciliation of the income tax expense based on statutory rates with actual is as follows:

	2011	2010
Profit before tax	399,915	224,609
Statutory tax rate	20%	20%
Theoretical income tax expense at the statutory rate	79,983	44,922
Non-deductible expenditures	12	1,185
Income tax expense	79,995	46,107

Deferred tax assets and liabilities as of 31 December and their movements for the respective years comprise:

	0.	rigination and		Origination and	
		reversal of		reversal of	
		temporary		temporary	
		differences in		differences in	
	th	e statement of		the statement of	
	c	omprehensive		comprehensive	
_	2009	income	2010	income	2011
Tax effect of deductible temporary differences:					
Accrued audit and consulting					
expense	2,520	(45)	2,475	(499)	1,976
Commission on guarantees	18,645	(17,130)	1,515	(458)	1,057
Unused vacation reserve	879	(230)	649	61	710
Amounts due from banks	126	307	433	(433)	_
Property, equipment and					
intangible assets	154	143	297	531	828
Other assets	50	(37)	13	13	26
Deferred tax asset	22,374	(16,992)	5,382	(785)	4,597
Tax effect of taxable					
temporary differences:					
Allowance for loan					
impairment	(21,629)	(5,636)	(27,265)	(1,395)	(28,660)
Provision for guarantees					
issued	(50,124)	24,699	(25,425)	7,895	(17,530)
Loans to customers	_	_	_	(6,945)	(6,945)
Deferred tax liability	(71,753)	19,063	(52,690)	(445)	(53,135)
Net Deferred tax liability	(49,379)	2,071	(47,308)	(1,230)	(48,538)
Net Deferred tax liability	(49,379)	2,071	(47,308)	(1,230)	

13. Other impairment and provisions

The movements in other impairment allowances and provisions were as follows:

	Other assets	Guarantees	Total
31 December 2009	_	65,752	65,752
Charge	18	46,708	46,726
Forex		10	10
31 December 2010	18	112,470	112,488
Reversal	(18)	(10,117)	(10,135)
31 December 2011	_	102,353	102,353

Allowance for impairment of assets is deducted from the carrying amounts of the related assets. Provisions for guarantees are recorded in liabilities.

14. Other assets and liabilities

Other assets comprise:

	2011	2010
Prepayments for goods and services	11,595	5,367
Prepaid corporate income tax	6,253	147
Other	2,517	5,480
	20,365	11,012
Less – Allowance for impairment of other assets (Note 13)	_	(18)
Other assets	20,365	10,944
Other liabilities comprise:		
	2011	2010
Deferred income on commission income from guarantee issued	5,283	7,575
Payable for professional services	4,939	6,188
Unused vacation reserves	3,550	3,245
Other	755	4,318
Other liabilities	14,527	21,326

15. Equity

Movements in shares outstanding, issued and fully paid were as follows:

	Number of		
	ordinary shares	Issue price	Total
31 December 2009 and 2010	3,000,000	1,005	3,015,000
Increase in share capital	250,000	1,005	251,250
31 December 2011	3,250,000	1,005	3,266,250

The share capital of the Bank was contributed by the shareholders in KZT and they are entitled to dividends and any capital distribution in KZT. Each ordinary share has one vote. In 2011 and 2010 the Bank did not declare or paid dividends.

In February 2011 the Bank converted subordinated loan from shareholders of KZT 1,005 thousand into 250,000 ordinary shares (Note 11).

16. Commitments and contingencies

Operating environment

The Republic of Kazakhstan continues economic reforms and development of its legal, tax and regulatory frameworks as required by a market economy. The future stability of the economy of the Republic of Kazakhstan is largely dependent upon these reforms and developments and the effectiveness of economic, financial and monetary measures undertaken by the government.

The economy of the Republic of Kazakhstan has been affected by the global financial crisis. Despite some indications of recovery there continues to be uncertainty regarding further economic growth, access to capital and cost of capital, which could negatively affect the Bank's future financial position, results of operations and business prospects.

16. Commitments and contingencies (continued)

Operating environment (continued)

Also, factors including increased reduced corporate liquidity and profitability, and increased corporate and personal insolvencies, have affected the Bank's borrowers' ability to repay the amounts due to the Bank. In addition, changes in economic conditions have resulted in deterioration in the value of collateral held against loans and other obligations. To the extent that information is available, the Bank has reflected revised estimates of expected future cash flows in its impairment assessment.

While Management of the Bank believes it is taking appropriate measures to support the sustainability of the Bank's business in the current circumstances, unexpected further deterioration in the areas described above could negatively affect the Bank's results and financial position in a manner not currently determinable.

Legal

In the ordinary course of business, the Bank is subject to legal actions and complaints. Management believes that the ultimate liability, if any, arising from such actions or complaints will not have a material adverse effect on the financial condition or the results of future operations of the Bank.

Taxation

The Bank's business activity is carried out in the Republic of Kazakhstan. Kazakhstani tax, currency and customs legislation as currently in effect is vaguely drafted and is subject to varying interpretations, selective and inconsistent application and changes, which can occur frequently, at short notice and may apply retrospectively. Management's interpretation of such legislation as applied to the transactions and activity of the Bank may be challenged by the relevant authorities. It is therefore possible that transactions and activities of the Bank that have not been challenged in the past may be challenged at any time in the future. As a result, significant additional taxes, penalties and interest may be assessed by the relevant authorities. Fiscal periods remain open and subject to review by the tax authorities for a period of five calendar years immediately preceding the year in which the decision to conduct a tax review is taken. Under certain circumstances tax reviews may cover longer periods.

As at 31 December 2011 Management believes that its interpretation of the relevant legislation is appropriate and that the Bank's tax, currency and customs positions will be sustained.

As of 31 December the Bank's commitments and contingencies comprised the following:

	2011	2010
Credit related commitments		
Guarantees issued	1,395,674	1,079,502
Undrawn loan commitments	156,208	94,462
	1,551,882	1,173,964
Operating lease commitments		
Not later than 1 year	35,208	37,116
	35,208	37,116
Less – Provisions (note 13)	(102,353)	(112,470)
Commitments and contingencies (before deducting collateral)	1,484,737	1,098,610
Less – Cash held as security against guarantees (note 10)	(12,178)	(5,345)
Commitments and contingencies	1,496,915	1,103,955

17. Net fee and commission income

Net fee and commission income comprises:

	2011	2010
Guarantees	26,169	121,442
Currency conversion operations	11,184	16,291
Cash operations	9,314	9,903
Transfer operations	5,715	5,306
Customer accounts maintenance	737	836
Other	2,264	3,159
Fee and commission income	55,383	156,937
Transfer operations	(1,832)	(1,582)
Cash operations	(336)	(608)
Fee and commission expense	(2,168)	(2,190)
Net fee and commission income	53,215	154,747

18. Personnel and other operating expenses

Personnel and other operating expenses comprise:

	2011	2010
Salaries and bonuses	(83,202)	(74,082)
Social security costs	(8,115)	(7,432)
Other employment taxes	(503)	(221)
Personnel expenses	(91,820)	(81,735)
Rent	(37,156)	(39,561)
Administrative expenses	(12,414)	(9,609)
Professional services	(11,895)	(15,576)
Other expenses on non(banking activities	(9,325)	(5,064)
Depreciation and amortization	(7,743)	(6,185)
Communication expenses	(6,515)	(5,580)
Security expenses	(5,528)	(5,563)
Business trip expenses	(3,716)	(3,276)
Advertising and marketing costs	(2,834)	(868)
Transportation expenses	(2,263)	(1,513)
Taxes, other than income tax	(963)	(414)
Cash collection expenses	(925)	(950)
Other	$(\hat{6}, 377)$	(3,608)
Other operating expenses	(107,654)	(97,767)

19. Risk management

Introduction

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

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

Risk management structure

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

Board of Directors

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

19. Risk management (continued)

Introduction (continued)

Management Board

The Management Board has the responsibility to monitor the overall risk process within the Bank.

Assets and Liabilities Management Committee

The Assets and Liabilities Management Committee ("the ALMC") has the overall responsibility for the development of the risk strategy and implementing principles, frameworks, policies and limits. It is responsible for the fundamental liquidity risk issues and manages and monitors relevant risk decisions.

Risk Management

The Risk Management Unit is responsible for implementing and maintaining risk related procedures to ensure an independent control process.

Bank Treasury

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

Internal audit

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

Risk measurement and reporting systems

The Bank's risks are measured using a method which reflects both the expected loss likely to arise in normal circumstances and unexpected losses, which are an estimate of the ultimate actual loss based on statistical models. The models make use of probabilities derived from historical experience, adjusted to reflect the economic environment. The Bank also runs worst case scenarios that would arise in the event that extreme events which are unlikely to occur do, in fact, occur.

Monitoring and controlling risks is primarily performed based on limits established by the Bank. These limits reflect the business strategy and market environment of the Bank as well as the level of risk that the Bank is willing to accept, with additional emphasis on selected industries. In addition the Bank monitors and measures the overall risk bearing capacity in relation to the aggregate risk exposure across all risks types and activities.

Information compiled from all the businesses is examined and processed in order to analyse, control and identify early risks. This information is presented and explained to the Management Board, the Assets and Liabilities Management Committee, and the head of each business division. The report includes aggregate credit exposure, credit metric forecasts, hold limit exceptions, liquidity ratios and risk profile changes. On a monthly basis detailed reporting of industry, customer and geographic risks takes place. Senior management assesses the appropriateness of the allowance for credit losses on a quarterly basis. The Board of Directors receives a comprehensive risk report once a month which is designed to provide all the necessary information to assess and conclude on the risks of the Bank.

For all levels throughout the Bank, specifically tailored risk reports are prepared and distributed in order to ensure that all business divisions have access to extensive, necessary and up-to-date information.

A regular briefing is given to the Management Board and all other relevant employees of the Bank on the utilisation of credit limits, liquidity, plus any other risk developments.

Risk mitigation

As part of its overall risk management, the Bank monitors its' exposures resulting from changes in interest rates, foreign currencies, credit risks, and exposures arising from forecast transactions.

The Bank actively uses collateral to reduce its credit risks (see below for more detail).

19. Risk management (continued)

Introduction (continued)

Excessive risk concentration

Concentrations arise when a number of counterparties are engaged in similar business activities, or activities in the same geographic region, or have similar economic features that would cause their ability to meet contractual obligations to be similarly affected by changes in economic, political or other conditions. Concentrations indicate the relative sensitivity of the Bank's performance to developments affecting a particular industry or geographical location.

In order to avoid excessive concentrations of risks, the Bank's policies and procedures include specific guidelines to focus on maintaining a diversified portfolio. Identified concentrations of credit risks are controlled and managed accordingly.

Credit risk

Credit risk is the risk that the Bank will incur a loss because its customers, clients or counterparties failed to discharge their contractual obligations. 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.

The Bank has established a credit quality review process to provide early identification of possible changes in the creditworthiness of counterparties, including regular collateral revisions. Counterparty limits are established by the use of a credit risk classification system, which assigns each counterparty a risk rating. Risk ratings are subject to regular revision. The credit quality review process allows the Bank to assess the potential loss as a result of the risks to which it is exposed and take corrective action.

Credit - related commitments risks

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

The maximum exposure to credit risk for the components of the statement of financial position before the effect of mitigation through the use of master netting and collateral agreements is best represented by their carrying amounts.

Credit quality per class of financial assets

The credit quality of financial assets is managed by the Bank internal credit ratings. The table below shows the credit quality by class of asset for loan-related lines in the statement of financial position, based on the Bank's credit rating system.

	Past due but not					
		Neither past due	impaired	Individually	Total	
	Notes	nor impaired 2011	2011	impaired 2011	2011	
Cash and cash equivalents except cash on hand Amounts due from credit	5	476,798	-	-	476,798	
institutions	6	14,680	_	_	14,680	
Loans to customers	7	3,022,210	140,044	1,358,944	4,521,198	
Corporate lending		2,514,531	140,044	1,277,290	3,931,865	
Individual entrepreneurs		452,433	_	60,141	512,574	
Small business lending		24,902	_	16,966	41,868	
Consumer lending		20,913	_	4,547	25,460	
Residential mortgages		9,431	_	-	9,431	
Total		3,513,688	140,044	1,358,944	5,012,676	

19. Risk management (continued)

Credit risk (continued)

	Notes	Neither past due nor impaired 2010	Past due but not impaired 2010	Individually impaired 2010	Total 2010
Cash and cash equivalents except cash on hand	5	553,249	_	_	553,249
Amounts due from credit institutions	6	542,463	_	_	542,463
Loans to customers	7	2,364,143	124,081	1,397,609	3,885,833
Corporate lending		1,951,684	124,081	1,303,554	3,379,319
Individual entrepreneurs		368,690	_	71,852	440,542
Small business lending		18,535	_	17,449	35,984
Consumer lending		17,205	_	4,677	21,882
Residential mortgages		8,029	_	77	8,106
Total		3,459,855	124,081	1,397,609	4,981,545

Past due loans to customers include those that are only past due by a few days. An analysis of past due loans, by age, is provided below. The majority of the past due loans are not considered to be impaired.

It is the Bank's policy to maintain accurate and consistent risk ratings across the credit portfolio. This facilitates focused management of the applicable risks and the comparison of credit exposures across all lines of business, geographic regions and products. The rating system is supported by a variety of financial analytics, combined with processed market information to provide the main inputs for the measurement of counterparty risk. All internal risk ratings are tailored to the various categories and are derived in accordance with the Bank's rating policy. The attributable risk ratings are assessed and updated regularly.

Aging analysis of past due but not impaired loans per class of financial assets

	Less than 30 days 2011	31 to 60 days 2011	61 to 90 days 2011	More than 90 days 2011	Total 2011
Loans to customers Corporate lending Total		82,235 82,235	57,809 57,809		140,044 140,044
	Less than 30 days 2010	31 to 60 days 2010	61 to 90 days 2010	More than 90 days 2010	Total 2010
Loans to customers Corporate lending		72,861	51,220	_	124,081
Total		72,861	51,220	_	124,081

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

Impairment assessment

The main considerations for the loan impairment assessment include whether any payments of principal or interest are overdue by more than 90 days or there are any known difficulties in the cash flows of counterparties, credit rating downgrades, or infringement of the original terms of the contract. The Bank determines the allowances appropriate for each loan on an individual basis. Items considered when determining allowance amounts include the sustainability of the counterparty's business plan, its ability to improve performance once a financial difficulty has arisen, projected receipts and the expected dividend payout should bankruptcy ensue, the availability of other financial support and the realisable value of collateral, and the timing of the expected cash flows. The impairment losses are evaluated at each reporting date, unless unforeseen circumstances require more careful attention.

Financial guarantees are assessed and provision made in a similar manner as for loans.

19. Risk management (continued)

Credit risk (continued)

Impairment assessment (continued)

The geographical concentration of Bank's monetary assets and liabilities is set out below:

	2011				2010			
•	CIS and other				CIS and other			
	Kazak-		foreign		Kazak-		foreign	
_	hstan	OECD	banks	Total	hstan	OECD	banks	Total
Assets:								_
Cash and cash equivalents Amounts due from	514,255	_	_	514,255	575,211	-	_	575,211
credit institutions	_	1,491	13,189	14,680	_	5,237	537,226	542,463
Loans to customers	4,227,453	_	-	4,227,453	3,643,764	-	-	3,643,764
•	4,741,708	1,491	13,189	4,756,388	4,218,975	5,237	537,226	4,761,438
Liabilities:								
Amounts due to customers Other financial	292,575	-	365	292,940	690,560	_	383	690,943
liabilities	8,859	148	5	9,012	12,110	128	5	12,243
Subordinated loan	100,036	-	_	100,036	251,297	_	_	251,297
·	401,470	148	370	401,988	953,967	128	388	954,483
Net assets	4,340,238	1,343	12,819	4,354,400	3,265,008	5,109	536,838	3,806,955

Liquidity risk and funding management

Liquidity risk is the risk that the Bank will be unable to meet its payment obligations when they fall due under normal and stress circumstances. To limit this risk, management has arranged diversified funding sources in addition to its core deposit base, manages assets with liquidity in mind, and monitors future cash flows and liquidity on a daily basis. This incorporates an assessment of expected cash flows and the availability of high grade collateral which could be used to secure additional funding if required.

The Bank maintains a cash deposit (obligatory reserve) with the National Bank, the amount of which depends on the level of customer funds attracted.

The Treasury Department is responsible for management of the current open position of the Bank. The Treasury performs the monitoring of the Bank's balance sheet liquidity and any changes thereof. The Bank's liquidity analysis is performed by the Treasury on monthly basis, and all members of the Assets and Liabilities Management Committee ("the ALMC") are informed appropriately.

The Bank uses internal methodologies to analyze the Bank's liquidity.

The ALMC performs weekly monitoring of liquidity risk by future expected cash flows – gap liquidity analysis. When the liquidity indicators worsen, the ALMC identifies the reasons and determines the strategy to mitigate the risk. The Risk Management Department performs regularly monitoring of compliance with the liquidity requirements determined by the Liquidity Management Policy, such as immediate, current, short-term, common and expected liquidity ratios.

Management of the Bank, mainly the Board of Directors and Management Board of the Bank, receives the information on the Bank's current liquidity at least on monthly basis and, when the current or expected liquidity positions worsen, on immediate basis.

19. Risk management (continued)

Liquidity risk and funding management (continued)

Analysis of financial liabilities by remaining contractual maturities

The tables below summarize the maturity profile of the Bank's financial liabilities at 31 December based on contractual undiscounted repayment obligations. Repayments which are subject to notice are treated as if notice were to be given immediately. However, the Bank expects that many customers will not request repayment on the earliest date the Bank could be required to pay and the table does not reflect the expected cash flows indicated by the Bank's deposit retention history.

Financial liabilities	Less than	3 to 12	1 to 5	Over	
As at 31 December 2011	3 months	months	years	5 years	Total
Amounts due to customers	293,005	_	_	_	293,005
Other liabilities	523	8,489	_	_	9,012
Subordinated loan	1,119	4,875	25,874	113,433	145,301
Total undiscounted financial					
liabilities	294,647	13,364	25,874	113,433	447,318

Less than 3 months	3 to 12 months	1 to 5 vears	Over 5 vears	Total
691,035	_	_	-	691,035
2,810	9,433	_	_	12,243
251,775	, <u> </u>	_	_	251,775
945,620	9,433	_		955,053
	3 months 691,035 2,810 251,775	3 months months 691,035 - 2,810 9,433 251,775 -	3 months months years 691,035 - - 2,810 9,433 - 251,775 - -	3 months months years 5 years 691,035 - - - 2,810 9,433 - - 251,775 - - -

The table below shows the contractual expiry by maturity of the Bank's financial commitments and contingencies. 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.

	Less than	3 to 12	1 to 5	Over	
	3 months	months	years	5 years	Total
2011 (note 16)	260,350	343,176	248,355	700,000	1,551,881
2010 (note 16)	339,049	533,916	300,999	_	1,173,964

The Bank expects that not all of the contingent liabilities or commitments will be drawn before expiry of the commitments.

Market risk

Market risk is the risk that the fair value or future cash flows of financial instruments will fluctuate due to changes in market variables such as interest rates, foreign exchanges, and equity prices. The Bank has exposures to market risk into non-trading portfolios. Non-trading positions are managed and monitored using other sensitivity analysis. Except for the concentrations within foreign currency, the Bank has no significant concentration of market risk.

Interest rate risk

Interest rate risk arises from the possibility that changes in interest rates will affect future cash flows or the fair values of financial instruments. The Bank's exposure to interest rate risk is not significant as the Bank borrows and places its funds with fixed rates.

Currency risk

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

19. Risk management (continued)

Market risk (continued)

Currency risk (continued)

The tables below indicate the currencies to which the Bank had significant exposure at 31 December on its non-trading monetary assets and liabilities and its forecast cash flows. The analysis calculates the effect of a reasonably possible movement of the currency rate against the Tenge, with all other variables held constant on the statement of comprehensive income - due to the fair value of currency sensitive non-trading monetary assets and liabilities). The effect on equity does not differ from the effect on the statement of comprehensive income. A negative amount in the table reflects a potential net reduction in statement of comprehensive income or equity, while a positive amount reflects a net potential increase.

	Increase in	Effect on profit	Change in	Effect on profit
	currency rate in %	before tax	currency rate in %	before tax
Currency		2011	2010	2010
USD	10.72	2,264	11.14	(1,218)
EUR	16.33	185	11.14	76
RUB	16.01	2,130	11.14	(733)
	Decrease in currency rate in %	Effect on profit before tax	Change in currency rate in %	Effect on profit before tax
Currency	Decrease in currency rate in % 2011	-	Change in currency rate in % 2010	-
<i>Currency</i> USD	currency rate in %	before tax	currency rate in %	before tax
•	currency rate in % 2011	before tax 2011	currency rate in % 2010	before tax 2010

Operational risk

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

20. Maturity analysis of assets and liabilities

The table below shows an analysis of assets and liabilities according to when they are expected to be recovered or settled. See Note 19 "Risk management" for the Bank's contractual undiscounted repayment obligations.

		<i>2011</i>		2010			
•	Within one	More than		Within one	More than		
	year	one year	Total	year	one year	Total	
Cash and cash equivalents	514,255	_	514,255	575,211	_	575,211	
Amounts due from credit							
institutions	14,680	_	14,680	542,463	_	542,463	
Loans to customers	1,549,608	2,677,845	4,227,453	2,594,504	1,049,260	3,643,764	
Property and equipment	_	11,357	11,357	_	8,830	8,830	
Intangible assets	_	14,039	14,039	_	14,667	14,667	
Other assets	20,365	_	20,365	10,994	_	10,994	
Total	2,098,908	2,703,241	4,802,149	3,723,172	1,072,757	4,795,929	
Amounts due to customers	292,940	_	292,940	690,943	_	690,943	
Deferred income tax liabilities	<i>2)2</i> , <i>)</i> +0	48,538	48,538	-	47,308	47,308	
Provisions	102,353	_	102,353	112,470	_	112,470	
Other liabilities	14,527	_	14,527	21,326	_	21,326	
Subordinated loan	36	100,000	100,036	251,297	_	251,297	
Total	409,856	148,538	558,394	1,076,036	47,308	1,123,344	
Net	1,689,052	2,554,703	4,243,755	2,647,136	1,025,449	3,672,585	

21. Related party disclosures

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

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

The outstanding balances of related party transactions are as follows:

	2011			2010				
	Key				Key			
		Entities	manage-			Entities	manage-	
		under	ment	Other		under	ment	Other
	Sharehol-	common	person-	related	Share-	common	person-	related
	ders	control	nel	parties	holders	control	nel	parties
Loans outstanding at								
1 January, gross	_	451,842	11,773	19,458	168,136	419,703	8,503	4,696
Loans issued during the year	_	1,235,582	8,800	3,500	_	374,728	8,338	16,350
Loan repayments during the								
year	_	(1,522,214)	(9,155)	(6,007)	(168, 136)	(342,589)	(5,068)	(1,588)
Other movements	_	(151,915)	(367)	(6,002)	_	_	_	_
Loans outstanding at								
31 December, gross	_	13,295	11,051	10,949	_	451,842	11,773	19,458
Less: allowance for								
impairment at 31 December	_	_	_	_	_	(1,125)	(29)	(48)
Loans outstanding at								
31 December, net	_	13,295	11,051	10,949	_	450,717	11,744	19,410
Current accounts at								
31 December	_	61,121	_	132	_	_	_	607,750
Subordinated loan at								
31 December					251,297			
		-					-	

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

	For the year ended 31 December							
	2011				2010			
	Entities under	Key manage-	Other		Entities under	Key manage-	Other	
	common	ment	related	Share-	common	ment	related	
	control	personnel	parties	holders	control	personnel	parties	
Interest income on loans	31,520	1,183	2,535	18,066	41,443	1,046	9,642	
Interest expense on subordinated debt	_	_	_	(1,646)				
Fee and commission income	_	_	14,843	_	_	_	17,008	
Other operating expenses	_	_	(4,200)	_	_	_	(23,151)	

Compensation of key management personnel was comprised of the following:

	2011	2010
Salaries and other short-term benefits	23,676	36,182
Social security costs	479	978
Total key management personnel compensation	24,155	37,160

22. Capital adequacy

Capital adequacy

The Bank maintains an actively managed capital base to cover risks inherent in the business. The adequacy of the Bank's capital is monitored using prudential norms established by the Committee on Regulation and Supervision of the financial market and financial organizations of the National Bank of the Republic of Kazakhstan (hereinafter - the "FMSC")in supervising the Bank.

During 2011, the Bank had complied in full with all its imposed capital requirements by FMSC.

The primary objectives of the Bank's capital management are to ensure that the Bank complies with externally imposed capital requirements and that the Bank maintains adequate capital ratios in order to support its business and to maximise shareholders' value.

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

FMSC capital adequacy ratio

The Bank manages its capital structure and makes adjustments to it in the light of changes in economic conditions and the risk characteristics of its activities. No changes were made in the objectives, policies and processes from the previous years.

FMSC requires banks to maintain a tier 1 capital adequacy ratio k1-1 and k1-2 of not less than 5% from all assets according to FMSC and a tier 2 capital adequacy ratio (k-2) of not less than 10% from risk-weighted assets, commitments and contingencies and operational risks. As at 31 December 2011 and 2010 assets, the Bank's capital adequacy ratio on this basis exceeded the statutory minimum.

As of 31 December 2011 and 2010, the Bank's capital adequacy ratio on this basis was as follows:

	2011	2010
Tier 1 capital	3,923,835	3,672,585
Tier 2 capital	166,948	312,079
Total capital	4,090,783	3,984,664
Risk weighted assets; commitments and contingencies	5,391,687	4,866,285
Operational risk	293,599	170,639
Capital adequacy ratio (k1-1)	82%	76%
Capital adequacy ratio (k1-2)	69%	64%
Capital adequacy ratio (k2)	72%	79%

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