BANK OF GEORGIA

MANAGEMENT REPORT 2024

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Report in accordance with the requirements of Article 7, paragraph 10 of the Georgian Law on Accounting, Reporting and Auditing

To the Shareholders and Supervisory Board of JSC Bank of Georgia

We expressed an unmodified audit opinion on the audited consolidated financial statements in our report dated 30 April 2025. The audited consolidated financial statements do not reflect the effects of events that occurred subsequent to the date our report on the audited consolidated financial statements. The effect of events described in the Management Report that occurred after the date of our auditor's report on the audited consolidated financial statements were not audited by us.

In our opinion, based on the work undertaken in the course of the audit:

- The information given in the Management Report for the financial year for which the financial statements are prepared is consistent with the consolidated financial statements; and
- The Management Report includes the information required by Article 7 of the Georgian Law on Accounting, Reporting and Auditing and complies with respective regulatory normative acts.

Ruslan Khoroshvili (SARAS-A-615243)

On behalf of EY LLC (SARAS-F-855308)

14 May 2025

Tbilisi, Georgia

About us

JSC Bank of Georgia (the '**Bank**') was established on 21 October 1994 as a joint stock company (JSC) under the laws of Georgia. The Bank and its subsidiaries (the '**Group**') mainly comprise: Retail Banking, SME Banking, and Corporate Banking operations in Georgia.

JSC Bank of Georgia, a systemically important and leading universal bank in Georgia, is the core entity of the Group.

At 31 December 2024, the Bank had 189 branches in all major cities of Georgia (31 December 2023: 189). The Bank's registered legal address is 29a Gagarini Street, Tbilisi 0160, Georgia.

Ownership

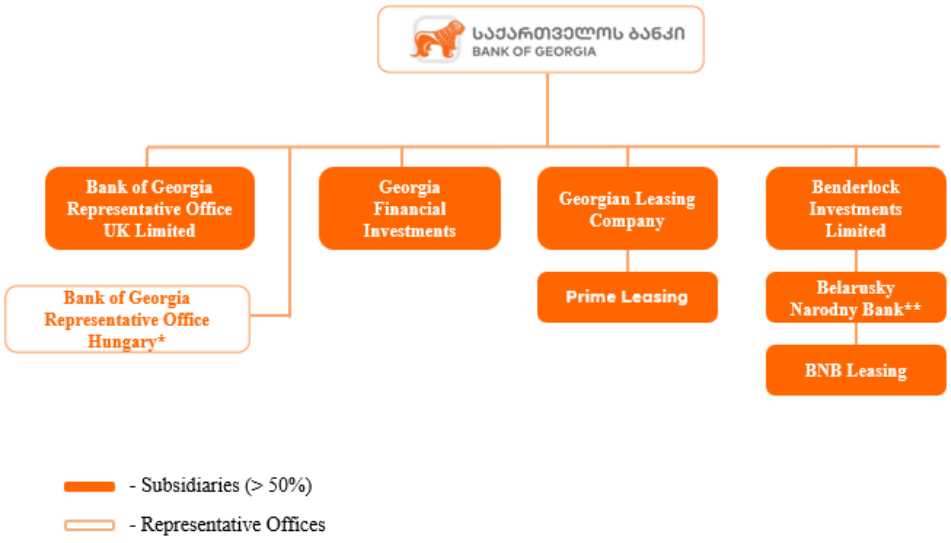
As at 31 December 2024, 31 December 2023 and 31 December 2022 JSC BGEO Group was the principal shareholder of the Bank. Less than 0.5% of the Bank's shares were owned by up to 1,000 different individual shareholders through the listing on the Georgian Stock Exchange.

Shareholder	31 Dec 24	31 Dec 23	31 Dec 22
JSC BGEO Group[1]	99.56%	99.56%	79.78%
Bank of Georgia Group PLC	0%	0%	19.78%
Others	0.44%	0.44%	0.44%
Total	**100.00%**	**100.00%**	**100.00%**

Before 29 May 2018 JSC BGEO Group was fully owned by BGEO Group plc, a public limited liability company incorporated in England and Wales that was the ultimate parent company of the Bank. The shares of BGEO Group plc were admitted to the premium listing segment of the Official List of the UK Listing Authority and admitted to trading on the London Stock Exchange plc's Main Market for listed securities, effective from 28 February 2012. As at 31 December 2024, 31 December 2023 and 31 December 2022 Bank of Georgia Group PLC (now renamed to Lion Finance Group PLC) (whose shares are listed on the Equity shares (commercial companies) segment of the London Stock Exchange with code BGEO.LN) was the ultimate parent company of the Bank.

[1] As at the date of this document, JSC BGEO Group holds 100.00% of the Bank's shares.

Group structure



**This representative office was not operational, did not have a physical office, and did not conduct any commercial activity whatsoever. While it was previously registered in the respective jurisdiction, the registration has since been officially liquidated as of the date of this document.*

***49.99% of BNB is owned by JSC Bank of Georgia directly and 49.99% is owned by BenderLock Investments Limited.*

In addition to the commercial legal entities presented above, the Bank is also the founder and the major contributor to "Tree of Life Foundation", a non-profit, non-commercial legal entity established under the laws of Georgia. For a full list of subsidiaries, associates and corporate shares within the Group structure, please see Note 2 – "Basis of preparation" – of the Consolidated Financial Statements.

Strategy and business model

Bank of Georgia a systemically important and universal bank in Georgia, is a digital banking leader on the local market, serving more than 2.0 million monthly active retail customers and more than 115 thousand monthly active business clients as at 31 December 2024. Enabled by high levels of customer satisfaction and the strength of our customer franchise, we have consistently delivered a return on average equity above 20%.

We focus on customer relationships – supporting our clients at every step of their journeys, creating products and services that fulfil their needs and delivering positive experiences across different touchpoints. We are committed to creating shared opportunities and building long-term

value – underpinned by the highest standards of corporate governance and a strong risk management framework and guided by our purpose – helping people achieve more of their potential.

Bank of Georgia's business consists of three segments: (1) Retail Banking (RB) operations, comprising sub-segments that serve mass retail (Mass Retail), and mass affluent and high-net-worth clients (SOLO and Wealth Management, respectively, together referred to as Premium Banking); (2) SME (small and medium-sized enterprises) Banking operations, serving small and medium businesses; (3) Corporate Banking (CB) operations serving large businesses.
We have defined a few strategic objectives that are expected to underpin the sustainable value creation at the Bank:

1. **The main bank**: Being the main bank in customers' daily lives by leveraging the digital and payments ecosystems
2. **Excellent customer experience**: Anticipating customer needs and wants and providing relevant products and services
3. **Profitable growth**: Growing the balance sheet profitably and focusing on segments with high growth potential

Our medium-term targets include achieving a return on average equity of at least 20% each year and achieving annual growth in Loans to customers, factoring and finance lease receivables portfolio of approximately 10%.

Key performance indicators

Financial KPIs

Profit (adjusted)[2] **GEL 1,632.1 M** +22.4% y-o-y	**ROAE (adjusted)[2]** **33.5%** +0.6 ppts y-o-y
Reflects the Group's financial performance by excluding one-off items, providing a clear view of profitability.	Profit for the year attributable to shareholders of the Group divided by monthly average equity attributable to shareholders of the Group for the same year.

Net interest margin (NIM) **6.0%** -0.4 ppts y-o-y	**Cost:income ratio** **29.0%** +0.9 ppts y-o-y
Net interest income for the year divided by the monthly average balance of interest-earning assets, excluding cash and cash equivalents and corporate shares.	Measures operating expenses as a proportion of adjusted operating income.

Net loan book growth **+20.1% y-o-y** +20.2% y-o-y as at 31 December 2023	**Deposit growth** **+22.0% y-o-y** +13.7% y-o-y as at 31 December 2023
Tracks the year-over-year change in net loans to customers, factoring and finance lease receivables.	Measures the year-over-year change in customer deposits.

Cost of credit risk ratio **0.4%** -0.3 ppts y-o-y

[2] In FY24, GEL 205.8m was recorded as a one-off item comprising a one-off gain on bargain purchase and acquisition-related costs of Ameriabank CJSC. Operating income before cost of risk and subsequent lines in the income statement as well as ROAA and ROAE were adjusted for these one-off items.

Expected loss/impairment charge on loans to customers and finance lease receivables for the year divided by the monthly average balance of these assets.

Non-financial KPIs

NPS **67** 59 in 2023	**eNPS** **54** 56 in 2023
NPS asks: on a scale of 0-10, how likely is it that you would recommend an entity to a friend or a colleague? The responses: 9 and 10 – are promoters; 7 and 8 – are neutral; 1 to 6 – are detractors. The final score equals the percentage of the promoters minus the percentage of the detractors.	eNPS asks: on a scale of 0-10, how likely is it that you would recommend an entity as a place to work to a friend or a colleague? The responses: 9 and 10 – are promoters; 7 and 8 – are neutral; 1 to 6 – are detractors. The final score equals the percentage of the promoters minus the percentage of the detractors.

Digital MAU **1,594.4K** +17.5% y-o-y	**sCoolApp MAU** **146.2K** +63.1% y-o-y
Retail customers who logged into our mobile or internet banking channels at least once during a given month. For business customers, this includes logins to our business mobile or internet banking channels.	The number of unique individuals who logged into sCoolApp at least once within the past month.

Number of self-employed borrowers **63.1K** +15.4% y-o-y	**Cash withdrawals in total transactions (quarterly) (by volume)** **25.8%** 28.1% in 2023
Number of individuals with a Bank of Georgia credit, whose income from self-employment exceeds 50% of their total income and whose business is not conducted in a legal entity form.	Calculates the percentage of cash withdrawal transactions relative to total transactions by dividing cash withdrawals by total transactions and multiplying by 100.

Green portfolio	**Digital transactional MAU**
1,003M	**1,400.5K**
+33.4% y-o-y	+18.4% y-o-y
The total outstanding balance of loans classified as green according to the National Bank of Georgia's Green Taxonomy.	The number of users who made at least one transaction through digital channels within the past month.

Year in review: Empowering individuals

We serve individual clients through the Retail Banking segment, which comprises Mass Retail and Premium Banking – with the latter consisting of our SOLO (mass affluent banking) and Wealth Management (WM) divisions. We served 2.0 million monthly active customers as at 31 December 2024.

Bank of Georgia maintained its leadership positions in retail banking throughout 2024, growing the customer franchise, reinforcing its competitive advantages in daily banking, and ensuring customers received high-quality service with personalised offerings and relevant products. The key drivers of customer franchise success and growth remained our globally acclaimed **digital channels**, **payments** solutions, and **loyalty** programme.

Portfolio dynamics

We demonstrated significant growth in both loans and deposits in the Retail Banking segment in 2024. Deposit growth of 14.5% y-o-y further strengthened our leading market position –as at 31 December 2024, 45.4% of individual deposits were held at Bank of Georgia, up 0.1 ppts percentage points y-o-y. This leading position in retail deposits provides us with a stable funding source.

As at 31 December 2024, net loans to customers, factoring and finance lease receivables in the Retail Banking segment stood at GEL 10,203m, an increase of 20.0% y-o-y. The main drivers of growth were consumer loans, followed by mortgages.

Portfolio risk parameters indicate a very healthy loan portfolio. The Retail Banking NPL ratio stood at 1.6% as at 31 December 2024, down 0.3 ppts y-o-y, while the Retail Banking cost of credit risk ratio was 0.4%, compared with 1.0% in 2023.

BOG App – the go-to financial mobile app

The BOG App is the most popular financial application in Georgia, with 800 thousand retail customers using it daily and 1.6 million retail customers (equivalent to 43.2% of Georgia's population of 3.7 million) using it at least monthly. This level of adoption underscores the app's high market penetration. It is a comprehensive financial superapp that fulfils both financial and lifestyle needs of our clients.

Bank of Georgia was recognised at the World's Best Digital Bank by Global Finance in 2024. Our technological success has been underpinned by customer-centricity. We

prioritise listening to our customers. We gather feedback through focus groups, surveys, usability testing, tree testing and other research methods to deliver relevant and innovative products. In 2024, to enhance our digital channels we conducted more than 200 research studies involving more than 30,000 participants.

More than 99% of all transactions happen outside of branches, while some product sales still happen in branches. Over the past few years, the share of products sold digitally has increased significantly, standing at 62% in the fourth quarter of 2024 (the decrease vs 70% in 4Q last year is due to the effect of gamification campaign in the fourth quarter of 2023, but the result is still significantly above the 45% average during the three quarters of 2023). While we made significant progress in loan and deposit offloading, significant number of cards are still ordered in branches. The card delivery process has also been a pain point for our customers. In 2024, we streamlined the card delivery process so that customers now receive automatic notifications at each step, such as when the courier is on the way, when the card is delivered, and so on. Couriers are now required to call customers at least an hour before delivery to confirm the delivery address. Additionally, the delivery company is obliged to make at least three delivery attempts. If all delivery attempts are unsuccessful, only then the card is returned to the branch.

During 2024, we addressed a number of customer requests. Improvements included enabling cash withdrawals with the Amex credit card added to the mobile wallet from the ATM or the QR code scanned with the BOG App, sending SMS notifications for loan rejections, and providing 24/7 access to digital lending. We also added a video banking option to the app, allowing customers to call our contact centre for assistance if they encounter difficulties. In 2024, over 28,000 video calls were recorded. Additionally, we integrated State Revenue Service features enabling customers to receive notifications from and make payments to the State Revenue Service. This service has been activated by more than 180,000 customers, highlighting its significance and value.

Payments

Developing our payments business remains one of the key strategic objectives supporting our position as “the main bank” in customers’ daily lives. Highly developed payment systems offer several advantages: 1) when customers use card transactions instead of cash, it gives us an opportunity to better analyse their behaviour and provide more relevant banking products; 2) payments generate commission income, creating a stable and non-volatile revenue stream for the Bank; and 3) customers who use our payment services become more loyal and are highly likely to choose Bank of Georgia if they need

other banking products.

Using Bank of Georgia for payments also offers advantages for our customers: 1) they accumulate loyalty points (PLUS points through Bank of Georgia's flagship loyalty programme, or Membership Rewards (MR) through American Express credit cards; 2) they receive cashback or discounts at a variety of merchants; and 3) they have better visibility of their personal finances through the Personal Finance Manager embedded in BOG App. Customers can make payments using a physical card as well as via Google Pay, Apple Pay, with PLUS or MR points, via QR code, and using Buy Now, Pay Later (BNPL).

We view cash as the primary competitor in the payments business. We have two main success criteria for the payments business – Payment MAU and the share of cash withdrawals in total transactions. Payment MAU measures the number of retail customers who used Bank of Georgia's card to make at least one payment within a month. We introduced cash withdrawals in total transactions as a KPI in 2023, with a target of 25% or lower (where lower is better). The cash withdrawals in total transactions in the fourth quarter of 2024 was 25.8% (down 2.3 ppts y-o-y). The BNPL service was launched for online sales in 2022 and in-store in 2023, and has gained popularity among our customers by allowing them to purchase items immediately and pay for them in interest-free instalments over four months. We consider BNPL a payment method but we set the maximum BNPL limit as GEL 5,000 – customers can activate and view their limits in the BOG App. In 2024, 78 thousand unique clients used BNPL.

Loyalty

Our flagship Loyalty programme, PLUS, is built on two main pillars: tiers and tier-linked benefits. Customers are assigned to tiers based on their banking activity, with each tier offering specific benefits. The primary benefit and key driver of customer engagement within these tiers is PLUS points. Customers accumulate PLUS points with every debit card payment made at BOG POS terminals. These points can be redeemed for payments and used as regular currency.

Our second programme, Membership Rewards (MR), is linked to American Express credit cards. Customers earn MR points for every GEL spent via credit cards, which can be redeemed for payments or exchanged for PLUS points.

In 2024, we revamped the PLUS programme to enhance customer experience and engagement. We replaced the 6-month tier cycles with simpler monthly cycles and

targets. The new programme features four tiers, each offering more points per transaction as customers move up. This redesign emphasises simplicity, integration of key products, value-based rewards, and ease of use.

Each year, we celebrate the PLUS birthday, during which clients' PLUS points double. In 2024, 59 thousand unique clients exchanged PLUS points during the PLUS anniversary and made 103 thousand transactions – highlighting the importance of our loyalty programme to our clients.

Mass Retail

The strength of our mass retail offering is built on a solid position in everyday banking, supported by the world's best digital banking service (as recognised by Global Finance in 2024), a generous loyalty programme and a strong position in payments. To address the unique needs of each client we use a sub- segment approach with our commitment to financial inclusion at the heart of everything we do. By tailoring our services to the specific requirements of each group, we get a comprehensive view of their needs and can more effectively serve various sub-segments including self-employed clients, ethnic minorities, youth, emigrants, and teachers.

As we move into 2025, our strategy will continue to focus on reaching underpenetrated and underbanked populations, ensuring more individuals and communities have access to the financial tools and support they need to thrive.

Youth segment

Youth represent a vital segment for us, as we see them not only as customers but as the foundation of future financial independence in Georgia. By focusing on school and university students, we aim to empower the next generation with the tools and knowledge needed to build strong financial habits, such as budgeting and saving.

We offer free daily banking services, tailored benefits, and relevant offers—including free or discounted public transport rides—to support their journey toward financial literacy. We believe that fostering financial confidence from an early age sets the stage for smarter money management and a more secure future.

Launched by Bank of Georgia in 2022, sCoolApp is a unique financial mobile app designed specifically for school students. As their primary daily banking channel, sCoolApp keeps children safe with end-to-end security, spending alerts, customised spending limits and in-app parental controls.

In 2023, we launched the highly popular gamification campaign called “Other Universe”, with over 80% of monthly active users completing at least one mission. The first phase was successfully completed in 2024, helping familiarise kids with the app’s features and introduce them to the basics of navigating financial services—an important step in building early financial literacy. In 2025, we aim to roll out an enhanced gamification module designed to drive higher daily engagement and deepen user interaction with the app.

Last year we set an ambitious target of reaching 150,000 MAU for our sCoolApp – and as at 31 December 2024 we reached 146,000, just shy of our target. For 2025, we are aiming for 185,000 MAUs, with a dual focus on increasing user acquisition and enhancing daily engagement.

To measure the growing engagement of school students, we closely track the Payment MAU and the usage of sCool Card, ensuring it continues to meet their needs and encourages greater financial involvement. The number of active sCool Card holders as at 31 December 2024 was 194,000 (up 36.9% y-o-y), and the sCool Card Payment MAU was 165,000 (up 41.8% y-o-y). The sCool Card is designed to provide students with a seamless and rewarding banking experience, offering a variety of exclusive benefits. These include free SMS, mobile, and internet banking, no fees for withdrawals at BOG ATMs, complimentary public transportation in Tbilisi and Batumi, discounts in transport in Zugdidi and Rustavi, and the ability to earn sCool points. The card is easily accessible and can be ordered online or through sCoolApp.

Students

University students are an important segment for us and we design special offers tailored to their needs. We offer a dedicated Student Card – a free debit card– which was used by 174 thousand students in December 2024. It comes with benefits such as free SMS, mobile and internet banking, as well as public transport discounts.

In 2024 we enhanced our offerings for students by introducing non-personalised Student Cards, allowing students to instantly activate plastic cards, and partnered with Evex Hospitals to launch a healthcare programme providing special pricing and discounts on medical services for Student Cardholders.

Recognising the importance of loyalty point accumulation for the youth segment, we also further incentivised students by giving two PLUS points for every GEL spent with the Student Card – matching the benefits offered to highest-tier mass retail customers. The number of active Student Card holders as of December 2024 was 220,000 (up 12.2% y-o-y).

Premium Banking

Premium Banking provides a comprehensive range of traditional banking services, personalised financial solutions, and access to exclusive lifestyle benefits, including select events and special partner offers. It is structured into two key divisions: SOLO, which serves the mass affluent segment, and Wealth Management, which focuses on high-net-worth clients, offering tailored financial support and wealth management services.

SOLO

SOLO is tailored for mass affluent clients, offering three exclusive packages designed to meet diverse needs: SOLO CLUB, SOLO Premium, and SOLO X.



In 2024, we introduced goal-based banking for SOLO CLUB members, positioning bankers as trusted advisers. With client consent, bankers analyse their finances and understand their individual goals, providing tailored recommendations based on income, expenses, and financial aspirations. This personalised service will expand to SOLO Premium clients in 2025.

In 2024, client requests for SOLO Concierge services increased by 95% compared with 2023, reflecting the value of this offering. SOLO Concierge is available exclusively to SOLO CLUB members and elevates clients' lifestyles with exceptional care. Members gain access to premium events, unique opportunities, and expert advice on dining, entertainment, and lifestyle activities. By efficiently managing everyday tasks, SOLO Concierge allows clients to focus on what matters most, blending convenience with sophistication.

In 2024 we provided 1,100 SOLO-specific offers, which were used by 83 thousand clients. To ensure the majority of our clients benefit from such offers, we include a wide range of options covering culture and art, education and entertainment for clients' children, hobby-based activities, discussions and meetings with various professionals, and international and local travel. We launched a Book Club in 2024, where clients can meet writers and engage in literary discussions.
While client acquisition continues to be a key priority, in 2025 our efforts will shift towards deepening client relationships by increasing product adoption per client. This approach not only enhances client value but also strengthens long-term engagement. To support this strategy, we continue investing in equipping our bankers with advanced knowledge and cutting- edge tools, enabling them to provide more personalised and insightful financial solutions tailored to individual client needs.

Wealth management

The Wealth Management business provides private banking services and offers investment products to high-net-worth individuals and their families. Additionally, it delivers exceptional lifestyle opportunities tailored to clients' unique needs and aspirations.

Empowering business customers

We provide banking services to 116 thousand monthly active legal entities (that is businesses), encompassing individual entrepreneurs, small and medium-sized enterprises as well as large corporate clients. Although these clients are divided between the SME Banking and Corporate Banking segments, they use the same digital channels and payment acquiring solutions that Bank of Georgia has developed to fulfil the financial and daily banking needs of businesses.

As of December 2024, Bank of Georgia had 116,000 monthly active legal customers (up 18.9% y-o-y). As at 31 December 2024, the number of monthly active digital users had reached 93 thousand, up 26.2% y-o-y – that is 80.4% of all monthly active business clients, underscoring the high level of digital uptake. We are focused on developing both the mobile app and internet platforms for businesses, as people in different roles within a business prefer to use each channel depending on their needs.

Approximately 99% of transactions are conducted through digital channels. However, product sales, especially on the lending side, through digital channels for business customers remain at a low level, presenting significant growth opportunities. This year, we launched an end-to-end unsecured digital loan solution for legal entities. While digital loan offloading was at 2% as of December 2024, we see potential for growth in the coming years and will focus on increasing digital loan portfolio in the coming years.

Merchant solutions

Bank of Georgia is the leading payments acquirer in the country. By prioritising user experience and service quality, BOG has focused on promoting digital payments – encouraging more individuals to adopt cashless payment methods and expanding its network of merchant clients. Furthermore, we actively support merchants in embracing digitalisation, fostering the growth of e-commerce businesses in Georgia.

Another digital platform – Business Manager was launched in 2023, integrating Ads Manager, Payment Manager and API Manager – and delivered promising results in 2024. Users can manage payments, access transaction analytics, launch and promote campaigns targeting Bank of Georgia's retail customers, and use Bank of Georgia's API services.

In 2024, over 500 offers were launched through Ads Manager, with 36.3% representing repeat usage. The platform's adoption has proven beneficial for businesses by facilitating offer promotion and driving sales, while retail clients enjoy a broader selection of incentives including cashback, discounts and multiplied loyalty points.

A key strength of our payments business is our leading position on both the issuing and acquiring sides. On the issuing side, customers prefer to pay with BOG cards on BOG POS terminals because they can earn loyalty points – creating a virtuous cycle. We provide merchants and customers with a wide range of online and offline payment solutions, including various types of POS terminals, loyalty points, installment plans, BNPL, as well as Apple Pay, Google Pay, and more.

SME Banking

As at 31 December 2024, SME Banking's net loans to customers, factoring and finance lease receivables stood at GEL 5,011m, up 10.1% y-o-y. The SME portfolio is highly diversified, with the largest portion consisting of trade, service, agriculture and real estate management sectors. SME Banking's NPL ratio stood at 3.5% as at 31 December, down 0.1 ppts y-o-y. The cost of credit risk for the full year was 0.3% versus 0.7% in 2023.

59.6% of the loan portfolio is in GEL, while the rest is in foreign currency. As at 31 December 2024, SME Banking's deposit portfolio stood at GEL 2,147m, reflecting a 14.4% increase in y-o-y. 40.6% of the deposit portfolio was in foreign currency, up 4.4 ppts y-o-y.

2024 developments

Our SME clients are highly digital, with 79.9% of our monthly active customers using business digital channels at least monthly as of December 2024. In 2024, we launched the first fully digital unsecured loan designed for SME customers. As at 31 December 2024, the loan portfolio balance of this product had reached GEL 3.5 million.

One of the pain points for our SME customers was the need to visit a branch and sign a contract after loan approval. In response to customer feedback, we introduced a digital signature process in our business digital channels, allowing existing SME borrowers to complete the process without visiting a branch. As a result, approximately 10% of approved loans in the SME segment are now signed through digital channels.

Approximately 62% of newly registered businesses choose to open their bank accounts with Bank of Georgia. We further streamlined and simplified the onboarding process for legal entities in 2024, adding automation when opening an account – this process, which previously took an average of three hours, is now completed in just two minutes. This option is available for resident individual entrepreneurs and resident simple LLCs (where 'simple' means the founder must be a resident and an individual entrepreneur).
Following registration we offer a comprehensive onboarding journey, providing tailored offers

and value-added services designed to meet the specific needs of our new clients. To enhance the use of our business mobile and internet apps, we have also introduced chatbot and video-banking functionalities in our digital channels.

Value-added services

To support our SME clients, we take a holistic approach combining financial assistance with a range of value-added services – all of which are consolidated into a single platform, Business 360 (launched in early 2025). This simplifies navigation for businesses and promotes relevant services tailored to their specific needs – including targeted capacity-building programmes in areas such as marketing and leadership, as well as expert advice to help businesses navigate the market effectively.

Clients can also access the Accounting Development Programme, initiatives supporting women entrepreneurs, B2B events, business courses, and other programmes designed to foster growth and innovation. We also offer valuable introductions and networking opportunities that can help clients expand their reach and build connections.

Corporate Banking

As at 31 December 2024, CB's net loans to customers, factoring and finance lease receivables stood at GEL 8,323m, up 28.5% y-o-y – the highest growth rate among GFS segments. CB's loan portfolio remains healthy, with the NPL ratio at 2.0% as at 31 December 2024 – up 0.3 ppts y-o-y, primarily driven by the default of a single corporate borrower. In 2024, the cost of credit risk ratio was 0.4%, the same figure as in 2023, further underscoring the high quality of the loan book.

CIB's loan book is well-diversified, spanning all sectors of the Georgian economy. The largest sectors by gross loans include construction development, energy, real estate management, hotels and tourism. The top 10 borrowers represented 6.6% of Bank of Georgia Group's total loan book, down 0.8 ppts y-o-y.

71.7% of the loan portfolio is in foreign currency. As at 31 December 2024, CB's deposit portfolio stood at GEL 6,585m, up 30.7% y-o-y. 34.3% of the deposit portfolio was in foreign currency, up 4.1 ppts y-o-y.

2024 developments

CB clients often require sophisticated, tailor-made loan solutions, requiring a thorough financial analysis for most applications. To streamline this process, in 2024 we

implemented a fast-track application system designed to identify low-risk clients based on predefined criteria. This improvement allows us to generate credit reports for eligible clients within a day – compared with the traditional process, which can take longer. As a result, we have significantly reduced the time-to-approval for certain loan disbursements, improving efficiency and client satisfaction. We plan for about 30% of loan applications to be processed through this fast-track mechanism in 2025, further enhancing our ability to respond quickly to client needs.

Our focus in 2025 will be on further digitisation to reduce waiting times and enhance accessibility, making banking more efficient and convenient for our clients.

Environmental, Social, and Governance (ESG)

Bank of Georgia's ESG Strategy focuses on four key pillars: Governance & Integrity, Financial Inclusion, Sustainable Finance, and Employee Empowerment. This strategic framework aims to create long-term value for the economy, environment, and society. We formalised these four pillars based on our comprehensive ESG materiality reassessment conducted in 2023, which enabled us to identify our most significant impacts and prioritise key material topics.

To ensure continued progress towards our ESG goals, we closely monitor the following KPIs:

ESG KPIs & performance in 2024

KPI	Target for 2024	Result	Status
Green Portfolio	GEL 875 m	GEL 1,003m	✓
eNPS	54	54	✓
sCoolApp MAU	150,000	146,224	✗
Number of self-employed borrowers	60,000	63,110	✓
Digital transactional MAU	1,291,000	1,400,511	✓

Environmental

We are committed to driving environmental sustainability and recognise our role in addressing pressing environmental challenges and fostering green practices. Our Environmental Policy outlines our objectives, strategies and practices, with a focus on embedding environmental considerations into our business strategy, operations, lending practices and decision-making processes. Through these efforts, we aim to mitigate environmental risks, promote sustainable projects, and ensure transparency and accountability in our environmental initiatives.

As a service provider, our direct environmental impact is limited, but we are committed to becoming a more resource-efficient company and mitigating any negative environmental impacts from our operations. In pursuit of this commitment, we continue to undertake initiatives to reduce energy consumption, including installation of energy-efficient lighting, equipment upgrades, HVAC optimisation.

Energy metrics	Amount (2024)
Total energy consumption (kWh)	29,814,309
Floor area (m²)	112,591
Energy intensity ratio (kWh/m²)	265

Beyond energy efficiency, we prioritise responsible waste management by minimising waste generation and actively promoting recycling. We have implemented waste segregation practices in our back offices, separating recyclable and non-recyclable materials, which are then responsibly managed by licensed third-party providers.

Type of waste	Amount (2024)
Total recycled non-hazardous waste	86 tonnes
Total recycled hazardous waste	6 tonnes
Total destructed non-recyclable waste	300 m^3

Bank of Georgia has reported its GHG emissions since 2012. In 2025, we plan to develop a comprehensive emission reduction strategy. This will involve a thorough analysis of all relevant data, allowing us to outline clear next steps to further strengthen our efforts to minimise emissions.

GHG emissions	Amount (2024)
Scope 1	2,548.8
Scope 2	2,616.2
Scope 3	7,832.9
Total emissions	12,997.9

As one of the country's largest purchasers, we recognise the Environmental and Social (E&S) impacts of our procurement decisions. We are committed to upholding human rights, promoting fair labour practices, and supporting diversity and inclusion throughout our supply chain, in accordance with our Supplier Code of Conduct. In 2023, we implemented a supplier E&S due diligence process to identify and prevent potential E&S risks within our supply chain, requiring suppliers with a turnover above GEL 500,000 to complete E&S questionnaires. By 2024, 52 suppliers had successfully completed these questionnaires, all meeting the necessary criteria.

We also promote environmental well-being by prioritising green lending for projects such as renewable energy, energy efficiency, and climate-smart agriculture. In 2024, our green loan portfolio exceeded its target of GEL 875 million by 17.1%, reaching GEL 1,024 billion – a 36.3% year-on-year increase. Our green portfolio is guided by our Green Finance Framework, which details the processes and criteria (i.e., "Eligible Green Loan Categories") for mobilising debt capital for sustainable and environmentally beneficial purposes.

Social

We believe that improving access to financial services is vital for fostering individual and community development. Our goal is to ensure everyone – regardless of location, background, or ability – has access to the tools and resources they need to manage their finances easily, plan and implement significant life decisions, and build wealth over time.

To support this vision, we have identified and eliminated the artificial barriers that have previously hindered self-employed individuals from accessing the full range of our credit products. Furthermore, we improved financial literacy and reached more self-employed individuals by engaging over 800 representatives across approximately 3,000 Georgian villages. These representatives assisted our credit experts in providing information about banking products and services. As a result, in 2024, we reached 63,100 self-employed borrowers (up 15.4% year-on-year), with a total portfolio of GEL 700.5 million (up 31.7% year-on-year).

In 2024, we integrated Armenian, Azerbaijani, and Turkish languages into our financial mobile app to improve access to banking services for non-Georgian speaking populations.

Bank of Georgia became the first commercial bank in Georgia to fully adapt its services for visually impaired customers, recognising that adapting services for people with disabilities is not simply a matter of compliance, but a crucial step towards fostering an inclusive society. We fully adapted at least one branch in every region of Georgia and every district of the capital to better serve visually impaired customers. In addition to adapting our branches, we have also modified 140 ATMs so that visually impaired customers can use these machines without assistance. To further safeguard their privacy, the screen blurs as soon as a customer plugs in their earphones, and a message appears confirming that the ATM is in 'listening mode', ensuring privacy.

Beyond our core operations, we are deeply involved in corporate social responsibility initiatives in the communities where we operate, offering educational materials, workshops, and tools designed to empower individuals and businesses and equip them with the knowledge and skills to manage their finances effectively.

Employment

We believe our ongoing success and sustainability are driven by the people we hire and the culture we cultivate. Employee empowerment is a core pillar of our ESG strategy, and we are committed to fostering a diverse, inclusive, and empowering work environment that offers equal opportunities for growth, innovation and impact.

Recognising that high-performing teams are built on strong governance and ethical leadership, all employees are guided by Bank of Georgia's Code of Ethics, which sets clear expectations for legal, ethical, and transparent business conduct. We are dedicated to ensuring inclusion and equal opportunities, with zero tolerance for discrimination based on any grounds, such as gender, race, disability or religious belief. Universal human rights are incorporated into the Employee Handbook, along with Lion Finance Group PLC's Anti-discrimination and Anti-harassment, Diversity, Equity and Inclusion, and Human Rights Policies. We operate a comprehensive

compliance and risk management programme to reinforce risk awareness and ensure a strong risk culture. New hires undergo mandatory training, with periodic retraining for all employees[3].

In addition, we keep employees informed and engaged by providing regular updates on strategy, performance, and new policies, while recognising their contributions through awards and milestone celebrations.

Our focus on employee empowerment is further supported by our open-door policy for raising concerns, underpinned by a strict no-retaliation policy. This aligns our grievance and whistleblowing mechanisms with global best practices. Bank of Georgia uses WhistleB, an independent reporting tool, for anonymous or confidential reporting of potential misconduct. Grievances are continuously tracked to identify trends and areas for improvement.

To ensure that gender has no bearing on career advancements or compensation we continuously track and address key gender equality indicators, including gender pay gaps. Furthermore, our employee value proposition offers more than competitive pay, including benefits such as extra leave, health insurance, support for pregnant women, education co-financing, financial aid for life events, overtime pay, and annual check-ups for night-shift workers. These benefits are available to all employees, regardless of employment status.

Governance

We are committed to conducting business in accordance with high standards of corporate governance and ethical principles.

Anti-bribery and anti-corruption (ABC)

Bank of Georgia upholds a zero-tolerance approach to bribery and corruption, underpinned by governance measures. Our comprehensive programme includes robust risk management processes, thorough third-party due diligence, and ongoing monitoring of high-risk activities. A structured investigating protocol ensures effective reporting and resolution of policy breaches. Employees receive regular training on ABC policies, with clear guidance on reporting unethical behaviour and maintaining compliance.

Integrity at Bank of Georgia is safeguarded by the Code of Conduct and Ethics, Anti-bribery and Anti-corruption Policy, Conflict of Interest Policy, as well as Know Your Employee procedures. ABC governance is integrated across internal functions, ensuring a cohesive and robust response. Executive Management and the Supervisory Board champion this, setting the ethical tone from the top. The Human Rights and Ethics Committee, authorised by the Supervisory Board, addresses ethical and anti-corruption matters, ensuring accountability. The Internal Control Department monitors high-risk scenarios, and managers play a key role in mitigating corruption risks. We

[3] The program covers topics such as cybersecurity, financial crime, operational risks, business continuity management, human rights, corporate values and Code of Conduct, anti-bribery, anti-corruption, diversity and inclusion, and whistleblowing.

continuously track the effectiveness of our ABC measures through regular updates, risk assessments, and feedback from various stakeholders, ensuring ongoing improvements to prevent unethical practices.

Environmental and social risk management

At Bank of Georgia, we are dedicated to carefully managing risks related to our lending activities. Our Environmental and Social Management System (ESMS) enables us to proactively identify potential risks and encourage customers to take effective mitigation actions. The ESMS is regularly updated and approved by the Environmental and Social Committee (ESI Committee) and the Supervisory Board. Our E&S Risk Management Procedures include evaluating a customer's activities for potential risks and impacts, ensuring their capacity and commitment to responsible risk management. We identify and implement appropriate mitigation measures, such as action plans or specific covenants. Continuous monitoring and reporting to the Bank's management and partner IFIs ensures transparency and accountability.

Risk Management

Our approach to risk

We recognise the importance of a strong risk culture – our shared attitudes, beliefs, values and standards that shape behaviours including those related to risk awareness, risk taking and risk management. All our employees are responsible for risk management, with ultimate supervisory oversight residing with the Board.

Bank of Georgia is the principal operating entity that drives the majority of the Group's revenue. Throughout this section and in the Principal Risks and Uncertainties section, we will refer solely to Bank of Georgia when discussing the Group's core operations.

The Enterprise Risk Management (ERM) function at Bank of Georgia is responsible for overseeing risk governance across the Bank. This includes gathering and consolidating risk data, monitoring risk levels, and enhancing risk management processes using a risk-based approach.

We aim to use a comprehensive risk management approach across the Bank, underpinned by our culture and values. Our risk management framework defines the key principles and practices we use for managing material risks, both financial and non-financial.

Key components of our ERM framework

Risk governance:

Non-executive risk governance

The risk appetite limits are reviewed and approved annually by the Supervisory Board, and is advised by its Risk Committee.

Executive risk governance

Executive Management assesses the effectiveness of the implementation of the risk management and internal control policies and procedures.

Roles and responsibilities:

'Three lines of defence' model

Our ERM framework is based on the industry standard 'three lines of defence' model for risk management.

Processes and tools:

Risk appetite active risk management: identification, measurement, mitigation and reporting

We have processes in place to identify, assess, measure, manage and report risks to ensure we remain within risk appetite.

Internal controls

We continuously develop the control environment in business processes, including through segregation of duties, preventive tools integrated in the systems, and restrictions of user rights.

Risk management process

1. **Identify**
   Risk identification is performed regularly and is a joint effort of the business and the Risk Management function. The main goal is to detect potential risks in a timely manner and to avoid or mitigate the potential harm those risks would bring. In case of material internal or external change, additional ad hoc risk identification can be performed. The Supervisory Board regularly discusses key risks and management's risk mitigation strategies and actions.

2. **Assess and measure**
   Each identified risk is assessed based on its likelihood and potential financial and non-financial impacts, before being compared to risk appetite and specific limits or triggers. We prioritise risks, determine necessary responses, and align exposures with risk tolerances.

3. **Mitigate**
   Risk-mitigating activities are developed and implemented to lessen potential negative impacts. When evaluating these, actions, costs, benefits, residual risks and secondary risks are also considered. All key controls are recorded and regularly reviewed. If a control is ineffective, root causes are analysed and action plans are developed to improve the control design.

4. **Monitor and report**
   We monitor risk mitigating actions for timeliness, consistency and systematic execution. Key risks are escalated appropriately. The Audit and Risk Committees of the Supervisory Board review significant risk changes and mitigation quarterly (or more often, if needed) and report to the Supervisory Board. Monthly risk reports inform senior management’s risk management.

Risk appetite

The risk appetite framework is a key component of the Bank's ERM framework. We define our risk appetite – the level and types of risk that we are willing to take, informing the financial planning process and guiding strategic decision making – through our Risk Appetite Statements (RAS). Risk appetite stems from BOG’s strategic objectives and helps ensure everyone is aligned on the level of risk we are willing to accept. It is approved by the Board annually and performance against RAS is reviewed and reported to the Risk Committee quarterly, while a risk appetite

dashboard is presented monthly to Executive Management – all of which ensures risks are promptly identified and mitigated.

Risk culture

Risk culture is at the heart of our risk management practices. A strong culture, starting with the Supervisory Board, supports the Bank in ensuring ethical business operations and that performance, risk and reward are aligned.

To develop this, Bank of Georgia focuses on giving employees the awareness and capabilities to manage risk. We provide a wide range of training programmes – some mandatory for all employees, others role-specific or part of individual development plans. Mandatory training programmes are accessible online and ensures BOG keeps its customers, employees and the whole organisation safe.

Risk governance and internal controls

The Supervisory Board has ultimate supervisory responsibility for the management of risk. The Bank's CRO is responsible for the Bank's risk management framework – including establishing policy, monitoring risk profile, and identifying and managing risk.

Bank of Georgia operates based on the industry standard three-lines-of-defence model.

The first line of defence owns the risks and is responsible for identifying, recording, reporting and managing them in line with risk appetite, complying with policies and regulations, and ensuring the right mitigation controls are in place.

The second line of defence develops policies, methods and procedures, as well as establishing and implementing the risk appetite framework, including setting limits. It challenges the first line of defence on effective risk management and provides advice, guidance and assurance of the first line of defence to ensure it is managing risk effectively in compliance with policies and regulations.

The third line of defence is the Internal Audit function, which provides independent assurance that the risk management approach and processes are designed and operating effectively. The Head of Internal Audit function has a direct reporting line to the Audit Committee.

All roles below the CEO within the Bank fall within one of the three lines, and all employees are responsible for understanding and managing risks within their individual roles and responsibilities.

The Supervisory Board is responsible for reviewing the Bank's system of internal controls and confirming its adequacy and effectiveness. Certain matters – such as the approval of major capital expenditures, significant acquisitions or disposals and major contracts – are reserved exclusively for the Board. For other matters the Supervisory Board is assisted by its Risk and Audit

Committees, which play key roles in assessing the strength and effectiveness of the risk management and internal control systems.

With respect to internal controls over financial reporting, our financial procedures include a range of system, transactional and management oversight controls. Each quarter the CFO and other members of the Finance team discuss financial reporting and associated internal controls with the Audit Committee, which reports significant findings to the Supervisory Board. The Audit Committee also reviews quarterly, half-year and full-year financial statements and corresponding results announcements, and advises the Supervisory Board.

At the Executive Management/Management Board levels, a few Committees assume a crucial role in steering effective risk management. These committees include:

Asset and Liability Management Committee (ALCO): responsible for financial risk management, establishing policies and guidelines with respect to capital adequacy, market risk, funding and liquidity risk, interest rate and prepayment risks and respective limits, money market general terms, and credit exposure limits. The ALCO reviews scenario analyses and stress tests, regularly monitors compliance with pre-set risk limits and approves treasury deals.

Credit Committees: responsible for managing risk across loan portfolios in all business segments.

The Environmental and Social Impact Committee: responsible for the development and implementation of ESG strategy, including climate risk and opportunity management strategy.

Review of the effectiveness of risk management and internal controls

We review the effectiveness of our risk management processes and internal controls annually, with the assistance of the Audit and Risk Committees – covering all material systems including financial, operational and compliance controls. The latest review covered the financial year ended 31 December 2024 and obtained assurance from Executive Management, and Internal and External Audits. The Supervisory Board concludes with reasonable assurance that the appropriate internal controls and risk management systems were maintained and operated effectively during 2024, and that these systems continued to operate effectively up to the date of approval of this Annual Report. The review did not identify any significant weaknesses or failures in the systems. We are satisfied that our risk management processes and internal control systems comply with the UK Corporate Governance Code 2018 and the FRC's Guidance on Risk Management, Internal Control and Related Financial and Business Reporting.

Stress testing

Stress testing and scenario analysis are important risk management tools providing input for strategic decision- making and planning, as they enable the assessment of the impact of plausible but severe stress scenarios relating to the Bank's liquidity and capital positions. We regularly

assess the vulnerabilities of portfolios to adverse macroeconomic factors, financial market stresses and geopolitical developments. Portfolio sensitivities are fed into the impact assessment of profit and loss, liquidity and capital.

The Bank performs different types of stress tests:

ICAAP/ILAAP stress testing: The Internal Capital Adequacy Assessment Process (ICAAP) and Internal Liquidity Adequacy Assessment Process (ILAAP) estimate and maintain an adequate level of internal capital and liquidity sufficient to cover all key risks the Banks face or might face in the future, including under a stress scenario. ICAAP and ILAAP stress-testing results are reviewed by the Risk Committee and the Board of Directors.

Viability stress testing: This stress test assesses the impact of plausible but severe stress scenarios on the Bank's financial position. Scenario assumptions for all relevant macroeconomic and financial market variables are set, and potential impacts are assessed against the viability of the Bank. A viability stress test is performed at least annually and reported to the Audit Committee and Supervisory Board.

Reverse stress testing: This stress test assesses the level of disruption that might cause the Bank to fail. Failure in this context is defined as the level of loss that would lead to the breach of core capital ratios.

Ad hoc stress testing: Scenarios that capture the current economic conditions, specific exposures facing the Banks and update analysis of potential future extreme events related to macroeconomic factors. Frequency of stress testing depends on material changes in the operating environment of the Bank.

Regulatory: Mandated by the regulator, providing the context and methodology for stress tests. Stress-test methodologies vary by type and objective. Depending on the risk type, risk management units are responsible for performing the analysis. If unacceptably high risks are identified, risk units adopt measures to mitigate them and reflect those measures in their strategic plans.

Recovery Plan stress testing: Mandated by the regulator, this stress test evaluates the Bank's ability – along with its chosen recovery measures – to overcome extreme stress situations that result in the breach of certain indicators' threshold levels.

Principal and emerging risks

Bank of Georgia identifies key risks that could impact its performance or outlook. Information from all business units is analysed to identify, assess and manage emerging risks. Additionally, we monitor broader macroeconomic risks and escalate them to the Supervisory Board through regular presentations.

We proactively identify and manage emerging risks, which are newly developing or evolving risks that could materially impact the Bank in the future but remain uncertain in terms of timing and

effect. The Supervisory Board reviews these risks alongside principal risks to assess potential implications and ensure proactive mitigation strategies are developed as they become more defined.

The order in which the principal risks and uncertainties appear does not denote their priority. It is not possible to fully mitigate all risks. Any system of risk management and internal control is designed to manage –rather than eliminate – the risk of failure to achieve business objectives, and can only provide reasonable and not absolute assurance against material misstatement or loss. The Bank is also exposed to risks wider than those listed. Additional risks and uncertainties – including those the Bank is currently not aware of or deems immaterial – may also result in decreased revenues, incurred expenses or other events that could in turn result in deteriorated performamce. We disclose the risks we believe are likely to have the greatest impact on our business, and which have been discussed in depth at the Bank's recent Supervisory Board, Audit Committee or Risk Committee meetings.

Bank of Georgia has identified climate risk as an emerging risk. We continue to assess climate-related risks, both transition and physical, for our client base and determine potential impacts on the Bank.

Principal risks and uncertainties

Macro and Geopolitical risks

Macro and geopolitical risks are the risks of adverse changes in macroeconomic parameters and/or the geopolitical environment that may result in the deteriorated performance and position of the Bank.

Key drivers and developments

Key sources of macro risk related to Georgia are changes in GDP, inflation, interest rates and exchange rates, and political events. Despite robust performance of the Georgian economy in recent years, common downside risks to growth persist – including regional geopolitical instability and global growth slowdown.

The unresolved war in Ukraine and ongoing military conflict in the Middle East contribute to elevated geopolitical risks. The Georgian economy is considerably exposed to these risks due to their reliance on imported goods and foreign direct investment, as well as external sector inflows generated by exports, international tourism and money transfers.

The possibility of a global increase in tariffs and greater trade uncertainty may lead to slower global growth and tighter financial conditions, inducing capital outflows from developing economies such as Georgia. Worsened risk appetite among international investors may cause increased foreign-currency debt burden and depreciation pressures on local currencies.

Georgia faces certain country-specific risks. Continued political polarisation following the October 2024 Parliamentary elections could impact consumer and sentiment, affecting business domestic economic performance. The upcoming municipal elections in October 2025 could also introduce further political tensions.

Due to Georgia's proximity to Russia, financial institutions face increased risks related to sanctions evasion. Bank of Georgia has strengthened compliance and due diligence measures to mitigate these risks.

Mitigation

Governance: The Supervisory Board receives quarterly updates on global, regional and country-specific macroeconomic conditions from economic specialists. The Supervisory Board also regularly discusses the impact of major political and geopolitical developments .

Monitoring and reporting: We continuously monitor macroeconomic developments and consider adverse economic and geopolitical conditions in stress and scenario analyses, including portfolio-level sensitivity analysis – enabling Executive Management to take proactive actions, which may include changing operational risk limits during underwriting, if necessary.

Other mitigants: According to Georgian legislation, effective from 1 January 2025, loans of up to GEL 500,000 can only be issued in GEL if a borrower's income is also in GEL. Additionally, the NBG has determined a currency-induced credit risk (CICR) capital buffer to reduce systemic risks caused by dollarisation. This buffer is created for risk positions denominated in a currency different from that used to cover those positions.

For loans to individuals, the NBG's payment-to-income (PTI) and loan-to-value (LTV) requirements are more conservative for foreign currency loans to mitigate borrower-level credit risk: PTI requirements for foreign currency loans are 5 ppts higher for income below GEL 1,500 and 20 ppts higher for income above GEL 1,500; and the LTV requirement for foreign currency mortgage loans is 15 ppts tighter.

The open currency position limits set by the Supervisory Board of Bank of Georgia are currently more conservative than those required by the central bank.

Credit risk

Credit risk is the risk that the Bank will incur a financial loss because its customers or counterparties fail to meet their contractual obligations. It arises mainly in the context of the Bank's lending activities.

Key drivers and developments

Expected credit loss (ECL) charge could increase if an idiosyncratic risk for any single large borrower materialises in Bank of Georgia, or if a sectoral or systemic event leads to higher default rates in Georgia. In addition, a change in portfolio composition may lead to increased cost of credit risk.

Mitigation

Governance: The Supervisory Board receives quarterly updates on the Bank's credit risk profile during its regular meetings, as well as during discussions and meetings related to the approval of quarterly results.

Bank of Georgia has three independent Credit Risk Management departments overseeing and challenging frontline credit risk management activities in Retail Banking, SME Banking and CB. Each department is supported by Credit Risk Analysis and Portfolio Risk Analysis teams. The ERM department oversees Bank-wide credit risk assessment processes, manages portfolio-wide credit risk policies, continuously monitors Bank of Georgia's credit quality parameters, and manages risk budgeting, stress testing and scenario analysis. ERM provides regular reports to Executive Management and the Supervisory Board on Bank of Georgia's credit risk profile and the effectiveness of risk management strategies.

Risk appetite: Bank of Georgia has established credit risk appetites, including quantitative limits, designed to mitigate excessive credit risk and concentration at various levels. Credit risk profile relative to risk appetite is monitored and reported quarterly to the Risk Committee, which reports any significant issues to the Supervisory Board.

Credit risk identification and assessment: The credit assessment process is distinct across segments and is further differentiated by product types. At Bank of Georgia, Corporate, SME Banking and larger Retail Banking loans are assessed individually, while unsecured Retail Banking loan decisions are largely automated.

To ensure a robust credit-granting process, Bank of Georgia has implemented several measures and frameworks:

Well-defined lending standards: Clear standards for granting credit, outlining the requirements that borrowers must meet. These standards serve as a benchmark for evaluating the creditworthiness of customers, enabling the identification and assessment of potential risks.

Segregation of duties: Credit analysis and approval involves a clear segregation of duties among the parties involved. Credit analysts and loan officers prepare presentations with key borrower information. These presentations are then reviewed by a business credit risk officer – ensuring all risks and mitigating factors are identified and addressed, and that loans are properly structured.

Multi-tiered loan approval committees: A loan is reviewed and approved by multi-tiered Credit Committees, with different loan approval limits to consider a customer's overall risk profile. Different committees are responsible for reviewing credit applications and approving exposures based on the size and the level of risk of the loan.

Loan portfolio quality monitoring and reporting: Bank of Georgia continuously monitors the credit risk of its loan portfolios. Processes and controls are in place to ensure macro and micro developments are identified in a timely manner.

Monitoring includes a full assessment against risk appetite limits, supported by a series of key risk and early warning indicators to identify areas of the portfolio with potentially increasing credit risk. Chief Risk Officer and Credit Risk Management departments review the credit quality of the portfolio monthly. The Supervisory Board Risk Committee periodically reviews these analyses in the light of a wider macro environment perspective.

Bank of Georgia strictly adheres to customer exposure limits set by the regulator for CB loans and limits set internally, monitor the level of concentration in the loan portfolio and the financial performance of their largest borrowers, and maintain a well-diversified loan book.

Collateral valuation: Property and other types of security arrangements are used to mitigate credit risk. In CB and SME Banking, collateral mainly includes liens over real estate, property, plant, equipment, inventory, transportation equipment, corporate guarantees, and deposits and securities. In Retail Banking, loans to individuals are primarily collateralised by liens on residential property.

Bank of Georgia monitors the market value of collateral during reviews of the adequacy of the allowance for ECL. When evaluating collateral for provisioning purposes, a discount to the market value of assets is applied to reflect the liquidation value of collateral. An evaluation report of the proposed collateral is prepared externally by a reputable third-party asset appraisal company or internally by the Asset Evaluation department and submitted to the appropriate Credit Committee alongside a loan application and a Credit Risk Officer's report.

Restructuring and collections: Bank of Georgia provides support to borrowers experiencing financial difficulties to help them meet their contractual obligations. Cases are managed on an individual basis by the Collections teams, which may initiate a loan restructuring process, modifying the contractual payment terms to support customers and subsequently transfer loans back to the performing category. At Bank of Georgia, for unsecured retail loans overdue for more than 30 days, restructuring alternatives are automatically offered through digital channels. The recovery process is initiated when a borrower enters the event of default. If a mutual agreement cannot be achieved between the borrower and the Bank, the collateral repossession process is initiated, which may include court, arbitration or notary procedures.

ECL measurement: BOG uses the ECL model of IFRS 9 to determine loss allowances, acknowledging its forward- looking nature. The model follows a conventional approach that

involves dividing the estimation of credit losses into its components: probability of default (PD), loss given default (LGD), and exposure at default (EAD).

Under IFRS requirements, allowance for credit losses is based on ECL associated with the PD in the next 12 months, unless:

(a) there has been a significant increase in credit risk since loan origination, (b) exposure has been defaulted or (c) the financial instrument meets the definition of purchased or originated credit-impaired (POCI) – in such cases, allowance is based on ECL over the lifetime of an asset. Allowance for credit losses is based on forward-looking information, considering past events, current conditions and forecasts of economic parameters.

The Bank divides its credit risk portfolio into POCI financial instruments and all other financial instruments. The POCI financial instruments are purchased or originated financial assets that are credit-impaired on initial recognition. They remain in their category until derecognition (even if cured). Lifetime ECLs are recognised for the POCI financial assets, even if the financial instrument no longer meets the default criteria.

For all other instruments BOG uses a three-stage model for ECL measurement:

Stage 1: If, at the reporting date, exposure is not credit- impaired and credit risk has not increased significantly since initial recognition, the Bank recognises a credit loss allowance in an amount equal to a 12-month ECL.

Stage 2: If, at the reporting date, exposure is not credit- impaired but credit risk has increased significantly since initial recognition, the Bank recognises a credit loss allowance in an amount equal to lifetime ECL.

Stage 3: If, at the reporting date, exposure is credit-impaired, the Bank recognises a loss allowance in an amount equal to lifetime ECL, reflecting a PD of 100% for those financial instruments that are credit-impaired.

Bank of Georgia determines ECL of financial assets on a collective basis, and for individually significant loans on an individual basis, when a financial asset is impaired. ECL for non-defaulted significant loans is assessed collectively. BOG creates ECL provisions considering a borrower's financial condition, days past due, changes in credit risk since loan origination, forecasts of adverse changes in commercial, financial or economic conditions affecting the creditworthiness of the borrower, and other qualitative indicators such as external market or general economic conditions. If ECL subsequently decreases, the previously recognised loss is reversed by an adjusted ECL account.

Counterparty risk: By performing banking services – including lending on the inter-bank money market, settling a transaction on the inter-bank FX market, entering into inter-bank transactions related to trade finance or investing in securities – the Bank is exposed to the risk of loss due to the failure of a counterparty to meet its contractual obligations. To manage counterparty risk, Bank

of Georgia defines limits on an individual basis for each counterparty based on an external credit rating and overall risk profile, as well as country limits to manage concentration risk. Counterparty credit risk exposures are monitored daily and any breaches are escalated to the Bank's Executive Management. As at 31 December 2024, 95.5% of Bank of Georgia's inter-Bank exposure was to 'Investment Grade' banks (based on Fitch, Moody's and Standard and Poor's assessments).

Liquidity and funding risks

Liquidity risk is the risk that the Bank will be unable to meet its payment obligations when they fall due under normal or stress circumstances.

Funding risk is the risk that the Bank will not be able to access stable and diversified funding sources at an acceptable cost.

Key drivers and developments

The availability of funding in emerging markets is influenced by the level of investor confidence – and anything negatively affecting this may affect the price and/or availability of funding for the Bank. BOG's liquidity may also be affected by unfavourable market conditions. If liquid assets become illiquid or if their value drops substantially, the Bank may need to rely on other sources of funding. However, only a limited amount of funding is available on the Georgian inter-bank market, and recourse to other funding sources may pose additional risks, including pricing risks.

Bank of Georgia is also exposed to the risk of unexpected, rapid withdrawal of large volumes of deposits by its customers and/or of utilisation of off-balance-sheet commitments. This may happen during a period of significant political, social or economic instability.

BOG maintains a diverse funding base comprising short-term funding (including Retail Banking and CB deposits, inter-bank borrowings and borrowings from the central banks) and longer-term funding (including Retail Banking and CB term deposits, borrowings from IFIs and long-term debt securities). Client deposits and notes are key sources of funding for Bank of Georgia.

Bank of Georgia has strong support from IFIs and private asset/fund managers, and maintains a strong pipeline to secure funding resources for the next 12 months.

BOG maintains strong liquidity and funding positions, with its liquidity coverage ratio (LCR) and net stable funding ratio (NSFR) ratios well above the minimum regulatory requirement of 100%. In the fourth quarter of 2024, Bank of Georgia maintained higher-than-usual liquidity levels in response to recent political tensions. As at 31 December 2024, Bank of Georgia's LCR stood at 138.6% and NSFR at 130.7%.

Mitigation

Governance: The Supervisory Board receives updates on the liquidity and funding position of the Bank during its regular meetings.

Funding and liquidity risk management across the Bank is governed by the ALCO. It approves liquidity risk management framework and risk appetite and oversees their implementation. RAS ultimately requires approval from the Supervisory Board.

Structural units within the Finance function, acting as the first line of defence, are responsible for managing liquidity and funding positions, ensuring access to funding markets, and managing the liquidity buffer. As the second line of defence, structural units within the Risk function are responsible for developing and maintaining policies, standards, and guidelines for funding and liquidity risk management, defining the risk appetite, conducting risk profile reviews, and communicating results to the ALCO.

Monitoring and reporting: BOG monitors a range of market and internal early-warning indicators daily to detect early signs of liquidity risk. Executive Management and the ALCO receive monthly updates on the liquidity position. The Risk Committee reviews liquidity risk, as integrated into the risk profile dashboard, on a quarterly basis.

Risk appetite: BOG has established RAS that defines its risk tolerance and aligns with the principles of liquidity adequacy. These liquidity RAS are translated into a range of metrics, approved by the Supervisory Board and reviewed at least annually. This process enables the identification of potential deviations from the desired risk profile and triggers proactive risk management actions.

Funding and liquidity management: Liquidity risk is managed through the ALCO-approved liquidity risk management framework, which model the ability of the Bank to meet its payment obligations under both normal and stress conditions. Additionally, Bank of Georgia has developed a liquidity contingency plan defining risk indicators for different scenarios and mitigation actions to identify emerging liquidity concerns at an early stage.

Liquidity stress testing: Bank of Georgia has developed an ILAAP, which includes a liquidity stress test and scenario analysis framework. This framework assesses the sufficiency of the Bank's liquidity buffers to withstand potential liquidity shocks, considering idiosyncratic, systemic and combined scenarios. The scenarios are designed to encompass all key liquidity-related items and factors and are periodically reviewed to ensure their continued relevance.

Capital risk

Capital risk is the risk of failure to deliver on business objectives, and/or to meet regulatory requirements and/ or market expectations, due to insufficient capital.

Key drivers and developments

Bank of Georgia is subject to the NBG's capital adequacy regulation, based on Basel III guidelines with regulatory discretion applied by the NBG. Current capital requirements include Pillar 1 requirements, combined buffer (systemic, countercyclical and conservation buffers) and Pillar 2 buffers (concentration, GRAPE, CICR, and stress-test buffers).

Since March 2023, Bank of Georgia has been subject to fully loaded capital requirements and is accumulating a neutral countercyclical capital buffer as follows: 0.25% by 15 March, 2024; 0.5% by 15 March, 2025; 0.75% by 15 March, 2026; and 1% by 15 March, 2027. The successful placement of a US$ 300 million offering of 9.5% perpetual AT1 notes in April 2024 and the redemption of the full US$ 100 million AT1 notes in June 2024 demonstrate Bank of Georgia's strong capital position and internal capital generation.

The Bank maintained capital adequacy ratios comfortably above the minimum regulatory requirements as at 31 December 2024.

Mitigation

Governance: The Supervisory Board actively oversees the capital position of the Bank, receiving quarterly updates during regular meetings.

Within the Bank, the Finance department's structural units, acting as the first line of defence, are responsible for daily capital risk management decisions. The risk management units, as the second line of defence, establish capital risk management frameworks and challenge their effective implementation.

Risk appetite: Bank of Georgia manages capital risk through defined risk appetites, which are expressed as various Bank-level limits and approved by the ALCO and the Supervisory Board. The risk profile relative to the defined risk appetite is monitored and reported monthly to the ALCO and quarterly to the Supervisory Board Risk Committee.

Capital management: Bank of Georgia has an ICAAP approved by the Supervisory Board and overseen by the ALCO. The Bank conducts an internal assessment of material risks annually to evaluates the amount, type, and distribution of capital necessary to cover these risks.

Bank of Georgia actively monitors early-warning indicators as part of the regulatory recovery plan, designed to identify emerging capital concerns at an early stage so mitigating actions can be taken promptly. Bank of Georgia sets internal capital management buffers above regulatory requirements, both at the ALCO and the Supervisory Board levels.

Capital stress testing: Capital stress testing plays a vital role in risk management processes by allowing the examination of severe but plausible stress scenarios and their impact on the capital

position. The results of capital stress-test analyses are used to support various aspects of the Bank's risk management and capital planning processes.

Planning and forecasting: Bank of Georgia updates capital forecasts on a fortnightly basis, based on updated business expectations, portfolio quality forecasts, market conditions, the latest trends and anticipated changes in the Bank's medium-term strategy.

Market risk

Market risk is the risk of financial loss due to fluctuations in the fair value or the future cash flows of financial instruments due to changes in market variables. It arises from mismatches of maturity, currency and/or interest rates between assets and liabilities, all of which are exposed to market fluctuations.

Key drivers and developments

The volatility of GEL may adversely affect BOG's financial position. Bank of Georgia's currency risk is calculated as an aggregate of open positions and limited by the NBG to 20% of regulatory capital.

BOG is exposed to interest rate risk due to lending at fixed and floating interest rates in amounts and for periods that differ from those of its term borrowings. Interest margins on assets and liabilities having different maturities may increase or decrease as a result of changes in market interest rates.

Mitigation

Governance: The governance of market risk management at Bank of Georgia is overseen by the ALCO and the Supervisory Boards, which approves the Bank's market risk appetite. Structural units from the Risk function serve as the second line of defence and are responsible for developing and maintaining policies, standards and guidelines for market risk management, setting the risk appetite, conducting risk profile reviews and communicating results to the ALCO.

Risk appetite: Bank of Georgia has currency exchange and interest rate risk appetite presented as different types of limits approved by the ALCO and the Supervisory Board. The risk profile relative to risk appetite is monitored by the ALCO and the Supervisory Board Risk Committee at least quarterly.

Market risk management: The general principles of market risk management policy are set by the ALCO. It sets limits on market risk exposures by currencies and closely monitors compliance with risk appetite frameworks. Exposures and risk metrics are regularly tested for various plausible scenarios.

Bank of Georgia's currency risk is calculated as an aggregate of open positions and is controlled by daily monitoring of open currency positions and the VaR historical simulation method based on 400-business-day statistical data.

Within limits approved by the Supervisory Board, Bank of Georgia's ALCO approves ranges of interest rates for different maturities at which Bank of Georgia may place assets and attract liabilities. As per regulatory requirements, Bank of Georgia assesses the impact of interest rate shock scenarios on economic value of equity (EVE) and NII. At 31 December 2024, Bank of Georgia's EVE ratio stood at 9.5%, below the maximum limit of 15.0%. EVE and NII sensitivities are further limited by the Supervisory Board risk appetite. In addition, the ALCO sets limits on EVE and NII ratios by currency with respect to Tier 1 capital and monitors them monthly. NIM sensitivity is also analysed by currency and is limited by the Supervisory Board and ALCO sets levels. Bank of Georgia's interest rate risk measurement practices were reviewed by an independent consultant during an NBG-initiated assessment of the Banking sector and were rated as in line with international standards.

Compliance and conduct risks

Compliance risk is the risk of legal and/or regulatory sanctions and/or damage to the Bank's reputation as a result of its failure to identify, assess, correctly interpret, comply with and/or manage regulatory and/or legal requirements.

Conduct risk is the risk that the conduct of the Bank and its employees towards customers will lead to unethical and/or unfair customer outcomes and/or adversely affect market integrity, damaging the Bank's reputation and competitive position.

Key drivers and developments

Bank of Georgia is subject to evolving legal and regulatory requirements, the extent and impact of which may not be fully predicted in advance.

Bank of Georgia is subject to the laws of Georgia and Bank of Georgia is supervised by the NBG.

Mitigation

Governance: The second line of defence for compliance risk management is comprised of the Legal and Compliance function, which is responsible for challenging the first line of defence in managing compliance risks; establishing compliance policies and methodologies; and coordinating the identification, assessment, documentation, reporting, and mitigation of compliance risks associated with the Bank's processes and products.

Compliance risk management framework: Compliance risk management at Bank of Georgia is guided by established policies and procedures that define the principles, standards, roles, and responsibilities of independent compliance functions. The Internal Audit function provides

oversight by reviewing these compliance risk management frameworks and policies. Mandatory compliance training programmes enhance employee awareness of compliance risks across within the Bank.

Monitoring and reporting compliance risk: Bank of Georgia places significant importance on measuring and managing compliance risk to ensure adherence to laws and regulations. This is achieved through ongoing risk monitoring, assessment, and reporting, which is the responsibility of the Compliance and Legal Risk Management function. The Chief Legal Officer regularly reports significant regulatory and legal changes, as well as material regulatory inspections, to the Supervisory Board.

Regulatory change management: In line with its integrated control framework, the Bank carefully evaluates the impact of legislative and regulatory changes during its formal risk identification and assessment processes. BOG's legislative and regulatory change management system enables respective departments to promptly identify the amendments of laws and regulations and prepare accordingly. In addition, BOG maintains a consistent process to design and implement appropriate changes by generating formalised action plans and ensuring follow-up. The efficiency of the regulatory change management process is additionally ensured by cooperating and conferring with regulatory bodies (mostly with the NBG) either directly or through the Banking Association.

Conduct risk management framework: Bank of Georgia follows its Code of Conduct and Ethics.

Bank of Georgia's Customer Protection Standard covers all stages of the product and services lifecycle, setting out requirements related to transparent product offerings and clear and accurate communications so customers can make informed decisions. Bank of Georgia's Customer Claims Management procedure handles customer complaints and concerns effectively, and the Legal Consulting unit serves as the second line of defence – ensuring complaint management is undertaken effectively and in compliance with applicable customer protection laws, regulations and internal policies and procedures. Claims related to the Code of Conduct and Ethics violations are reviewed by the Bank-level Compliance Committee to ensure they are properly handled and remediation plans are established.

Recurring claims potentially indicating a systemic issue and reports received through the whistleblowing platform are investigated and reported quarterly to the Audit Committee.

Bank of Georgia ensures related party transactions comply with the 'arm's length' principle, as defined by the regulator. The terms of such transactions are pre-determined under a special internal act – any deviations require approval from the Supervisory Board. For Bank of Georgia, certain cases – such as aggregate risk positions exceeding GEL 500,000, collateral replacement and similar scenarios – also require Supervisory Board approval. The Supervisory Board receives quarterly reports to monitor these transactions.

Financial crime risk

Financial crime risk is the risk of knowingly or unknowingly facilitating illegal activity, including money laundering, fraud, bribery and corruption, tax evasion, sanctions evasion, the financing of terrorism and/or proliferation, through the Bank.

Key drivers and developments

Financial crime risks continue to evolve globally, and the Bank faces stringent regulatory and supervisory requirements to manage them. Bank of Georgia is committed to protecting the integrity of the financial system, safeguarding customers, and remaining at the forefront of efforts to combat financial crime. This commitment is reflected in our ongoing investments in expertise, tools, and systems.

The geographical proximity of Georgia to the Russian Federation, combined with its position within the regional geopolitical landscape, presents heightened risks of sanctions evasion for financial institutions. This proximity increases the potential for sanctioned entities to attempt to exploit Georgian financial system to circumvent international restrictions. As a result, the Bank has reinforced its compliance frameworks and enhanced their due diligence procedures to proactively mitigate these risks.

Mitigation

Governance: Bank of Georgia manages financial crime risks through distinct lines of defense. The second line of defence, comprised of structural units responsible for risk management, develops and maintains policies, standards, guidelines, and internal compliance systems. These units also monitor the risks of sanctions evasion, ML and TF, and oversee risk identification, assessment, and management processes. To enhance monitoring, Bank of Georgia's AML and Sanctions Compliance department includes an assurance unit responsible for regularly assessing the effectiveness of Bank-wide control systems.

As the third line of defence, the Internal Audit function regularly assesses AML and sanctions compliance, ensuring robust adherence to regulatory standards and the integrity of financial operations within the Bank.

For continuous oversight of money laundering, TF, and sanctions evasion risks, an AML/Sanctions Compliance Committee has been established at Bank of Georgia.

Tax function within the Bank is responsible for managing tax risks and ensuring tax compliance.

Monitoring and reporting: Bank of Georgia's financial crime risk management programme aims to ensure all business units, support functions consider the impact of their activities on the risk profile, and take effective measures to ensure alignment with the Bank's risk-taking approach for financial crime. Bank of Georgia aims to prevent harm to customers and the economies caused by

criminals and terrorists, and actively monitors its exposure to financial crime risks – reporting all issues in a timely and proactive manner.

The risks associated with AML/CFT and sanctions evasion are reported to Executive Management monthly. During the year, quarterly reporting to the Risk and Audit Committees facilitated the awareness of financial crime risks at Supervisory Board level. Both quantitative and qualitative dashboards are analysed to ensure effective actions are taken to mitigate risks.

Anti-money laundering: Bank of Georgia has AML/CFT frameworks that reflect a risk-based approach. The Bank ensures compliance with local and relevant foreign legislation, integrating international standards and recommendations developed by the Financial Action Task Force and other pertinent international organisations.

Bank of Georgia has allocated substantial resources to enhancing its ML/TF risk management capabilities. This includes the implementation of advanced analytics and transaction monitoring solutions to detect suspicious activity, as well as the strengthening of offline reporting mechanisms. The reporting processes for Cash Transaction Reports and Suspicious Transaction Reports are fully automated.

Furthermore, the Bank has intensified its mandatory training programmes for employees, aiming to elevate their expertise in AML and CFT regulatory requirements.

In 2024, Bank of Georgia approved new AML risk appetite metrics. These metrics are subject to enhanced monitoring and periodic review to ensure ongoing compliance with the defined risk appetite.

Bribery and corruption: Bank of Georgia is committed to preventing bribery and corruption by implementing appropriate policies and processes and effective controls. The Bank has zero tolerance towards non-compliance with anti-bribery and anti- corruption policies and procedures. Apart from mandatory compliance with ABC policies, BOG has further adopted the Code of Conduct and Ethics, which serves as a reference point for employees on a daily basis.

The ABC Policy is diligently upheld at Bank of Georgia through internal communications, awareness campaigns and mandatory structured training for all employees. Training is completed during onboarding and biennially, and includes a comprehension test and signed acknowledgment to ensure accountability.

Sanctions compliance: Bank of Georgia maintains comprehensive policies, procedures and risk mitigation measures to comply with international sanctions frameworks enforced by key jurisdictions and bodies such as the US (Office of Foreign Assets Control), EU, UK (HM Treasury) and UN Security Council. These protocols undergo routine evaluations to ensure alignment with current sanctions regimes. The Bank upholds a stringent zero-tolerance policy towards sanctioned individuals, transactions, and funds associated with sanctioned entities, and any clients or transactions connected to the Russian military-industrial base.

Bank of Georgia has enhanced its due diligence processes to address rapidly evolving sanctions regimes. It has strengthened transaction screening, monitoring, and onboarding, as well as our review of transaction documentation, to detect potential sanctions violations. Our technology-driven approach includes an online solution that fully automates the screening of all transactions against sanctions lists from OFAC, the EU, the UK, the UN and other global databases.

Due diligence: Bank of Georgia continues to improve customer due diligence practices and transaction monitoring capabilities, including monitoring supported by risk-based scenarios, handling alerts and reporting suspicious activities where required. The Bank conducts Bank-wide AML/CFT and sanctions risk assessments, including an assessment of inherent risk, the effectiveness of controls and residual risk.

The customer risk assessment process is fully automated and ensures comprehensive management of customer risks across the entire business relationship lifecycle. BOG's current client base undergoes a rigorous and periodic due diligence process. During the onboarding process, comprehensive information regarding a corporate client's ownership structure, ultimate beneficial owners and sources of funds and wealth is meticulously gathered.

High-risk clients, including politically exposed persons and virtual asset service providers, those subject to adverse media coverage or performing unusual or crypto-currency-related transactions, or those living and working in countries or sectors with an inherently higher risk of financial crime, undergo additional enhanced due diligence. To manage risks associated with crypto currency, BOG has restricted international transactions related to virtual assets or involving virtual asset service providers.

Fraud risk: To mitigate fraud risk Bank of Georgia has implemented the following measures:

Know Your Employee procedures, including screening requirements at recruitment, employment and departure stages of employment, providing a clear understanding of an employee's background and actual or potential conflicts of interest.

Mandatory training for all new employees to increase awareness.

Communication channels to inform customers about fraud risks.

Information security and data protection risks

Information security risk is the risk of loss of confidentiality, integrity, and/or availability of information, data, and/or information systems.

Data protection risk is the risk presented by personal data processing – such as accidental and/or unlawful destruction, loss, alteration, unauthorised disclosure of, and/or access to, personal data stored and/or otherwise processed.

Both risks may lead to financial loss, reputational damage, or other significant adverse economic or social impacts.

Key drivers and developments

Information security risk is a top risk for organisations globally. Bank of Georgia remains subject to attempts to compromise its information security. The external threat profile is continuously changing, and the Bank expects threats to increase, including potential state-sponsored cyber-attacks.

Malicious actors focus on the following events:

- zero-day attacks, which exploit a previously unknown vulnerability;
- brand impersonation attacks, which use sophisticated techniques;
- cases where the Bank does not have direct control over the cybersecurity of the systems targeted (such as those of its customers and third-party service providers), limiting its ability to effectively defend against certain threats; and
- failure by employees to adhere to the Bank's policies, procedures and technical controls.

Bank of Georgia is one of Georgia's critical information system subjects – and, therefore, an uninterrupted operation of its information system is essential to the defence and/or economic security of the country, as well as to the maintenance of state authority and/or public life.

On 1 March 2024, significant amendments were made to the Law of Georgia on Personal Data Protection, aligning it more closely with the EU's GDPR.

Mitigation

Governance: Within Bank of Georgia, respective structural units from the Information Security function represent the first line of defence, following internal policies and procedures regarding information security and performing routine risk assessments, vulnerability scans and penetration tests to identify potential vulnerabilities within systems and infrastructure. In this manner they prevent unauthorised access attempts and maintain real-time monitoring to promptly detect and respond to any potential security incidents.

Respective structural units from the Risk function serve as a second line of defence. They regularly assess the design and operational effectiveness of security controls. These units provide oversight, guidance and support to business units, ensuring information security risks are identified, assessed and managed effectively, and monitor compliance with internal policies and external regulations.

Risk appetite: Information security risk is measured against predefined risk appetite metrics and thresholds. By establishing risk appetite, BOG aims to minimise exposure to data and security breaches. The risk profile relative to risk appetite is monitored and reported monthly to local Executive Management and quarterly to the Risk Committee.

Monitoring and reporting: Bank of Georgia's Internal Audit function, on a risk-based approach, provides independent assurance on the adequacy and effectiveness of risk management, internal controls and systems.

Information security is on the Risk Committee's regular agenda, and the Bank engages external third parties to conduct cybersecurity audits and penetration tests on a regular basis.

Zero-day attacks: Bank of Georgia regularly monitors zero-day vulnerability announcements that may affect its systems. If such a vulnerability is detected, the designated teams ensure it is attended to as soon as possible. Moreover, the Bank employs a 'defence in depth' approach, meaning it has multiple complementary security layers – if one mechanism fails, another will be activated immediately to prevent an attack.

Customer-targeted phishing: Malicious actors may carry out successful customer-targeted phishing attacks through fake websites, social networks, emails and other channels. Bank of Georgia focuses on improving information security controls to detect unauthorised access to customers' accounts, and run awareness-raising campaigns to help customers and the wider public recognise phishing and respond appropriately.

Supply chain cyber-attack: Bank of Georgia mitigates the risk of supply chain cyber attacks by performing due diligence on third-party providers, ensuring necessary security and data protection controls are in place before engagement and conducting annual monitoring to assess compliance with these requirements. Exit procedures are followed to protect the confidentiality, integrity and availability of information.

Failure by employees to adhere to the Bank's policies, procedures and technical controls: Employee training is one of the key components of information security and data protection risk management across the Bank.

Annual training is mandatory for all employees and includes a tailored course on mitigating information security risks while working remotely. Bank of Georgia runs quarterly phishing campaigns to test employees' ability to detect such attacks and respond appropriately.

Access management: BOG has a role-based access control, contributing to the automation of employee onboarding and existing employee rotation processes and enabling the restriction of network access based on the roles of individual users – in line with the principle of least privilege. The Bank also conduct a semi-annual privileged user evaluation process, and monitor and update access rights on an annual basis in each department.

Bank of Georgia does not grant privileged access rights to third parties without a justified business need. Even in such cases third parties with privileged access rights are required to use multi-factor authentication, and the Bank monitors their activities through a privileged access management solution.

Information security incident response: To mitigate key risks, Bank of Georgia has aligned its incident response plans with industry standards – following the National Institute of Standards and Technology (NIST) Computer Security Incident Handling Guide. Bank of Georgia has strengthened its defences with vandal-resistant backup storage to protect core database backups from internal and external threats. Bank of Georgia conducts ongoing breach and attack simulations to assess its networks, validate security configurations, and continuously improves its defences.

Personal data protection: In response to legal changes regarding personal data protection in Georgia, Bank of Georgia has undertaken several measures to enhance data protection and compliance including policy and procedure updates, process reviews, training programmes and customer communication.

Operational risk

Operational risk is the risk of financial and/or non- financial loss resulting from inadequate and/or failed internal processes, people and systems, or from external events. This encompasses human capital risk, which refers to the potential failure to achieve the Bank's strategic objectives, leading to operational disruption, financial loss, and/or reputational damage due to ineffective human capital policies and/or processes.

Operational risk may result in losses emerging from the following events, among others:

- internal fraud;
- external fraud;
- business disruption and system failures;
- employment practices and workplace safety;
- clients, products and business practices;
- damage to physical assets; and
- execution, delivery and process management.

Key drivers and developments

Customer expectations of banking products and services will change with the emergence of new technologies and service models, forcing banks to rethink their business models and deal with new operational risks. The speed of change and the need to innovate has spurred the introduction of technologies whose deployment needs careful management.

As major business processes become digitised, the importance of operational resilience increases. Major disruptions of vital services may result in material business impacts, including financial loss, reputational damage and business continuity threats. Vulnerabilities can be driven by external factors, including cyber attacks, dependency on critical vendors and outsourcing services. The

importance of operational resilience will continue to grow as technological advances will play a bigger role in the provision of financial services.

Employees are crucial for the Bank's success, supporting innovation and growth. The limited local talent pool makes recruiting top tech and data professionals challenging. To support its focus on digital capabilities and AI-driven decision-making, BOG prioritises attracting and retaining skilled talent and investing in leadership development for succession planning.

Mitigation

Governance: The first line of defence is represented by respective structural units responsible for identifying and assessing operational risks and establishing appropriate controls to mitigate them. The operational risk management units, as the second line of defence, are responsible for oversight and risk guidance. The third line of defence is Internal Audit, independently assessing operational risk and events in business processes.

Human capital risk is managed by the Human Capital Management function, which develops policies and frameworks to guide risk management and ensure legal compliance. It also monitors human capital risks and reports them to the Executive Management and the Supervisory Board.

Risk appetite: BOG has established operational risk appetites to effectively manage all operational risks. It has also defined its Bank-level human capital risk appetite, approved by the Supervisory Board.

The risk profile relative to risk appetite is monitored and reported monthly to Executive Management and quarterly to the Supervisory Board.

Monitoring and reporting: BOG monitors human capital risk through a series of quantitative and qualitative indicators, including ongoing deep interviews with individual employees, Bank and team/division-level eNPS, engagement scores, internal mobility, retention and employee turnover measures. The results of different surveys and measures are used to design action plans.

Operational risk framework: BOG has implemented policies and procedures and have established operational risk frameworks for anticipating, mitigating, controlling and communicating operational risks and the overall effectiveness of the internal control environment. Operational risk management units maintain a framework and a comprehensive set of policies and standards reviewed and approved by the relevant governance bodies to ensure they are aligned with recognised industry standards such as Basel and NIST, and made available to all relevant employees through internal channels.

- Various policies, processes and procedures are in place to control and mitigate operational risks, including but not limited to:
- Risk and control self-assessment (RCSA) programme – to identify and assess operational risks in business processes and products.

- New products assessment – to identify and assess potential operational risks related to new products before launch, offering recommendations for risk mitigation during the product design phase.
- Scenario analysis programme – to identify, analyse and measure a range of scenarios, including low-probability and high-severity events.
- Risk monitoring and reporting, conducted by structural units from the Risk function in bank – to monitor the actual operational risk profile against the agreed levels of risk tolerance and risk appetite.
- Business continuity management programme, which represents business continuity and disaster recovery plans for each critical business process – a combination of procedures and arrangements to make sure critical business processes are uninterrupted at the Banks.
- Risk awareness and training programmes, including awareness campaigns and mandatory training – to help employees identify existing and potential risks.

Bank of Georgia also employs several measures to manage human capital risk:

- Using various recruitment channels and collaborating with top universities to attract top talent. Bank of Georgia's Leaderator internship programmes offer young people real project experience, mentorship and a path to start their careers at the Bank.
- BOG focuses on succession planning and building a strong leadership pipeline for senior roles. Employees work with their managers to create yearly development plans based on performance feedback and 360° reviews. Internal mobility is encouraged to retain top talent.
- BOG offers competitive pay and benefits while promoting work-life balance. Pay trends are monitored through industry surveys and performance reviews determine compensation. Job structures and grading are regularly updated for clearer career paths.
- BOG prioritises transparent communication and it has grievance policies in place to ensure issues are addressed promptly and fairly. Employee Voice meetings with the Board of Directors support the exchange of ideas, concerns and facilitate discussion of employee views.

Model risk

Model risk arises from decisions based on incorrect model results due to inaccurate assumptions, inappropriate variables, low-quality data or inadequacies in model design, implementation or usage.

Key drivers and developments

As banking operations become more complex and digital, the adoption of statistical models, machine learning and artificial intelligence enhances decision-making and provides competitive

intelligence. To sustain these benefits, sound model risk assessment frameworks and validation practices are essential.

The NBG's regulation – Managing Risks for Data-based Statistical, Artificial Intelligence and Machine Learning Models – sets additional requirements for model development, validation, monitoring and application. The regulation requires that all relevant new and existing models be in line with regulatory requirements.

Given the increasing use of AI-driven models at Bank of Georgia, particular attention is paid to the oversight and mitigation of AI- related risks. To ensure effective oversight of AI, Bank of Georgia maintains internal policies and procedures governing AI usage, which outline clear guidelines for model development, validation, implementation, monitoring, and compliance with regulatory standards.

Mitigation

Bank of Georgia's Model Risk Management (MRM) framework is continuously reviewed and refined to address key model risks effectively. The MRM Policy outlines:

- Three lines of defence: A clear segregation of roles and responsibilities throughout the model lifecycle and model inventory governance among model owners (first line), an independent MRM function (second line), and Internal Audit (third line).
- Key controls: Standards covering data integrity, model development, documentation, validation, monitoring, revalidation, backtesting, model inventory management, as well as comprehensive model risk assessment and reporting.

In 2023, Bank of Georgia collaborated with McKinsey & Company to revise its MRM framework, aligning it with industry best practices.

Governance: At Bank of Georgia, model owners in the first line of defence are responsible for model development, implementation, operation, and continuous monitoring. In the second line of defence, Bank of Georgia's independent Risk function validates, oversees and challenges model adequacy and ensures regulatory compliance. Clear role definitions and independent validation functions ensure effective risk mitigation.

Monitoring and reporting: Material model-related issues within the Bank are subject to a robust oversight process, requiring approval from the CRO before being reported to the Supervisory Board.

BOG conducts continuous monitoring of model performance. Bank of Georgia has automated processes that generate notifications for relevant stakeholders on a regular basis (monthly, quarterly and ad hoc), with model owners overseeing performance and model validators supervising the process.

Model risk mitigation: Bank of Georgia employs similar strategies for model risk mitigation:

- Model redevelopment: Models are refined or redeveloped in response to changes in market conditions, business assumptions or processes, to maintain accuracy and relevance.
- Adjustments to model outputs: Adjustments, including expert-opinion-based revisions or the application of new restrictions, are made to improve model accuracy and address biases or limitations.
- Process enhancements: Additional controls or validation measures are introduced to further reduce model risk.

Strategic risk

Strategic risk is the risk that the Bank will be unable to execute its business strategy and create value for its stakeholders as a result of poor decision making, ineffective resource allocation, and/or a delayed and/ or ineffective response to changes in the external environment.

Key drivers and developments

BOG faces strategic risks due to changes in the legal, regulatory, macroeconomic and competitive environments. The increased economic uncertainty, the emergence of global fintechs and competition in financial services have changed stakeholder expectations – heightening the need for strategic, forward-looking risk management.

Mitigation

Strategic planning: BOG's Executive Management runs an annual strategic planning process to review its performance against targets, discuss the internal and external environment affecting the Bank, and develop short- and medium-term strategic plans considering potential financial and non-financial risks. This process is supported by RAS, capital plans and a recovery plan. BOG's strategy is approved by Supervisory Board.

Focus on customers and innovation: To mitigate strategic risks, BOG maintains a strong focus on incorporating customer feedback in decision-making and scanning the competitive landscape globally to ensure the Bank rolls out relevant and innovative products and offerings. These initiatives not only address current needs but also create a strong foundation for future client growth.

Monitoring: BOG's Executive Management hold regular meetings to discuss the performance of the Bank, the competitive landscape and the Bank's competitive positions, including any changes versus prior periods and any actions required. Key strategic areas and/or projects are periodically discussed in working groups comprising executive, senior and middle management.

Strategic objectives and/or decisions including major organisational changes and initiatives are regularly discussed with and challenged by the Supervisory Board, including during the quarterly

meetings. The Supervisory Board receives quarterly updates on the market environment and the competitive positioning of the Bank and challenges management's tactical or strategic actions.

Reputational risk

Reputational risk is the risk of damage to stakeholder trust and/or brand image due to negative consequences arising from internal actions and/or external events.

Key drivers and developments

BOG's operations are subject to inherent reputational risk, with primary drivers identified as: failure of internal execution; failure to manage cyber and phishing cases; and the difference between the Bank's values and public perceptions and/or opinion.

Mitigation

Risk appetite: Bank of Georgia has defined its Bank-level reputational risk appetite through a quantitative measure. The risk profile relative to risk appetite is monitored and reported monthly to local Executive Management and quarterly to the Risk Committee.

Mitigation: To mitigate potential reputational risks, effective systems and controls ensure high levels of customer service and compliance. Each material risk identified at any level of the business is measured, mitigated and monitored in accordance with the Bank's policies and procedures.

To protect and maintain brand strength, the marketing/PR teams monitor media coverage daily. Legal teams ensure marketing communications are fully compliant with internal policies, and review and confirm the compliance of products and services from a legal and regulatory perspective. Bank of Georgia regularly measures customer satisfaction and perceptions using both internal and independent external surveys, and monitor compliance with risk appetite limits – reporting to local Executive Management monthly.

Bank of Georgia also engages with customers on information security matters, spreading content including articles, direct emails, interactive games and questionnaires through various media. Bank of Georgia contributes to the development of information security in Georgia by regularly participating in collaborative efforts with financial industry peers, law enforcement authorities, regulatory bodies and the governments, sharing knowledge and preventing negative impacts.

To prevent inaccurate or misleading reporting that could damage the reputation of the Bank by losing stakeholders' trust, BOG has a well-documented reporting process with strong controls for fairness and transparency. Oversight from the Supervisory Board as well as the External Auditor ensures BOG's financial and narrative reporting is trustworthy.

Emerging risks

Climate-related risk

Climate-related risk is the risk of financial loss and/or damage to the Bank's reputation as a result of the accelerating transition to a lower-carbon economy and/or the materialisation of actual physical damage as a result of acute and/or chronic weather events.

Transition and physical risks may impact the performance and financial position of the Bank's customers and their ability to repay loans.

Key drivers and developments

BOG's stakeholders are increasingly demanding more climate-related disclosures – including climate risk assessments and GHG emissions reporting – as well as actions to address climate-related risks.

Bank of Georgia's ultimate parent company, Lion Finance Group PLC, is subject to climate reporting obligations under both the UK Financial Conduct Authority's Listing Rules and Sections 414CA and 414 CB of the UK Companies Act 2006.

Since 2020, BOG has identified climate change as an emerging risk, making climate-related risk an integral part of its risk inventory. Bank of Georgia has developed a climate scenario analysis toolkit to conduct stress testing and model the impacts of climate change risks on the credit risks of clients. Bank of Georgia has continued to strengthen climate considerations within the credit risk management framework.

Mitigation

Governance: The ESI Committee at Bank of Georgia, comprising executive and senior management, is responsible for overseeing the Bank's climate, environmental and social impacts – focusing mainly on those arising from its lending activities. It holds overall responsibility for designing climate, environmental and social strategies and policies, and setting and monitoring targets. The final responsibility for decisions made by the ESI Committee rests with the Supervisory Board.

Centralised teams of Environmental, Social and Climate Risk specialists within BOG's Risk function are responsible for:

- Conducting research on environmental and social risk assessment methods.
- Implementing and updating environmental and social policies, procedures and methods.
- Identifying, assessing, managing and mitigating environmental and social risks for the Banks' clients, based on a standardised due diligence process.
- Identifying climate-related opportunities and classifying green loans.

- Calculating financed emissions.
- Supporting other departments to implement environmental and social and climate-related tasks.
- Preparing environmental and social disclosures.

In addition, Bank of Georgia actively addresses the aforementioned issues with a focused climate-related perspective, ensuring alignment with the Bank's commitments to climate-related risk management and climate action.

Climate-related risks mitigation:

- Bank of Georgia has integrated climate-related risks into its risk management framework and business resilience assessments. Its mitigating activities also include:
- Identifying and addressing sector- and location-specific climate risks for business clients, as part of loan appraisal and origination processes, as well as the environmental and social risk management process.
- Expanding our climate scenario analysis toolkit and deepening our knowledge of climate change and climate policy in Georgia and the global implications.
- Collecting relevant data, including on output produced and energy consumed, and calculating Scope 3 financed emissions for some GHG-intensive corporate clients.
- Identifying and reporting on transactions aligned with the NBG's Green Taxonomy (from January 2023).
- Developing sectoral E&S policies to address specific high- risk industries which may have high adverse impact on people and/or the environment. We are committed to working closely with clients, especially those in high-emission industries, to support their shift towards sustainable practices by tackling issues like data limitations, technical capacity, and access to funding.
- Facilitating climate-related disclosure.
- Raising climate finance awareness among clients and implementing training for employees.

Overview of financial results

Income statement highlights

GEL thousands	FY 24	FY 23	Change Y-o-Y
Interest income	3,338,441	2,729,285	22.3%
Interest expense	(1,495,694)	(1,143,285)	30.8%
Net interest income	**1,842,747**	**1,586,000**	**16.2%**
Net fee and commission income	387,808	340,672	13.8%
Net foreign currency gain	446,719	370,847	20.5%
Net other income	49,455	115,110	-57.0%
Operating income	**2,726,729**	**2,412,629**	**13.0%**
Operating expenses	**(790,163)**	**(678,955)**	**16.4%**
Profit from associates	87,305	984	NMF
Operating income before cost of risk	**2,023,871**	**1,734,658**	**16.7%**
Cost of risk	(102,164)	(141,971)	-28.0%
Net operating income before non-recurring items	**1,921,707**	**1,592,687**	**20.7%**
Net non-recurring items	-	-	-
Profit before income tax expense and one-off items	**1,921,707**	**1,592,687**	**20.7%**
Income tax expense	(289,573)	(258,968)	11.8%
Profit adjusted for one-off items	**1,632,134**	**1,333,719**	**22.4%**
One off items[4]	205,765	-	-
Profit	**1,837,899**	**1,333,719**	**37.8%**

Balance sheet highlights

GEL thousands	Dec-24	Dec-23	Change Y-o-Y
Liquid assets	12,700,901	9,676,305	31.3%
Cash and cash equivalents	*2,278,476*	*3,042,832*	*-25.1%*
Amounts due from credit institutions	*2,456,690*	*1,752,658*	*40.2%*
Investment securities	*7,965,735*	*4,880,815*	*63.2%*
Loans to customers, factoring and finance lease receivables[5]	*24,316,155*	*20,248,067*	20.1%
Property and equipment	441,399	404,303	9.2%
All remaining assets	1,814,708	1,065,435	70.3%
Total assets	**39,273,163**	**31,394,110**	**25.1%**
Client deposits and notes	25,341,733	20,776,816	22.0%
Amounts owed to credit institutions	6,710,494	5,133,029	30.7%
Borrowings from DFIs	*2,385,049*	*2,124,264*	*12.3%*

[4] In FY24 GEL 205.8 m was recorded as a one-off item comprising a one-off gain on bargain purchase and acquisition-related costs of Ameriabank CJSC. Operating income before cost of risk and subsequent lines in the income statement were adjusted for these one-off items.

[5] Throughout this section, gross loans to customers and respective allowance for impairment are presented net of expected credit loss (ECL) on contractually accrued interest income. These do not have an effect on the net loans to customers' balance. Management believes that netted-off balances provide the best representation of the loan portfolio position.

Short-term loans from the National Bank of Georgia	*2,546,574*	*2,101,653*	*21.2%*
Loans and deposits from commercial banks	*1,778,871*	*907,112*	*96.1%*
Debt securities issued	1,099,337	421,359	160.9%
All remaining liabilities	491,101	610,856	-19.6%
Total liabilities	**33,642,665**	**26,942,060**	**24.9%**
Total equity	**5,630,498**	**4,452,050**	**26.5%**

Key ratios

	FY24	FY23
ROAA (adjusted for one-offs)[4]	4.7%	4.7%
ROAA	5.3%	4.7%
ROAE (adjusted for one-offs)[4]	33.5%	32.9%
ROAE	37.7%	32.9%
Net interest margin	6.0%	6.4%
Loan yield	12.4%	12.5%
Liquid assets yield	5.2%	4.7%
Cost of funds	5.1%	4.7%
Cost of client deposits and notes	4.3%	4.1%
Cost of amounts owed to credit institutions	8.0%	8.0%
Cost of debt securities issued	9.4%	8.2%
Cost:income ratio	29.0%	28.1%
NPLs to gross loans	2.2%	2.3%
NPL coverage ratio	62.8%	69.3%
NPL coverage ratio adjusted for the discounted value of collateral	114.8%	118.1%
Cost of credit risk ratio	0.4%	0.7%
IFRS based NBG (Basel III) CET 1 capital adequacy ratio	17.1%	18.2%
Minimum regulatory requirement	*14.9%*	*14.5%*
IFRS based NBG (Basel III) Tier I capital adequacy ratio	20.5%	20.0%
Minimum regulatory requirement	*17.0%*	*16.7%*
IFRS based NBG (Basel III) Total capital adequacy ratio	22.1%	22.1%
Minimum regulatory requirement	*19.9%*	*19.6%*

Net interest income

- Net interest income amounted to GEL 1,842.7 million, up 16.2% y-o-y, attributable to a loan book growth of 20.1% y-o-y.
- Net interest margin stood at 6.0% (down 40 bps y-o-y). The decrease in NIM was driven by combination of factors: higher liquidity, lower loan yields in GEL due to declining interest rates, and an increase in our cost of funds due to higher market rates on foreign currency deposits in Georgia and a greater proportion of higher-cost liabilities in the funding-mix.

Net non-interest income

- Net fee and commission income amounted to GEL 387.8 million, up 13.8% y-o-y, mainly due to increased activity in settlement operations.
- Net foreign currency (FX) gain amounted to GEL 446.7 million, up 20.5% y-o-y.
- Net other income was GEL 49.5 million, down 57.0% y-o-y, due to the absence of significant transactions on sale of repossessed assets that were recorded in the prior year.

Operating income

- Overall, the Group generated operating income of GEL 2,726.7 million, up 13.0% y-o-y, driven by growth in net interest income, net FX gain, and net fee and commission income, partially offset by the decline in net other income.

Operating expenses and efficiency

- Operating expenses amounted to GEL 790.2 million (up 16.4% y-o-y). The increase in operating expenses was primarily related to overall growth of business and ongoing investments in strategic areas.
- In 2024 the cost:income ratio stood at 29.0% (versus 28.1% in 2023).

Profit from associates

- The increase in profit from associates was driven by the recognition of a portion of Ameriabank CJSC's profit generated in 2024 since its consolidation.

Cost of risk

- The Group maintained strong asset quality, with the cost of credit risk ratio of 0.4% in FY24 (0.7% in FY23).

Profitability

- The Group's adjusted profit was GEL 1,632.1 million (up 22.4% y-o-y). The Group's unadjusted profit stood at GEL 1,837.9 million (up 37.8%), which includes a GEL 205.8 million one-off item comprising a one-off gain on bargain purchase and acquisition-related costs of Ameriabank CJSC.
- Adjusted ROAE increased to 33.5% (32.9% in FY23).

Loan book

- Net loans, finance lease, and factoring receivables amounted to GEL 24,316.2 million as at 31 December 2024, up 20.1% y-o-y in nominal terms. The increase was primarily driven by the expansion of CB loans and growth in consumer lending within the RB segment.
- The NPLs to gross loans ratio decreased to 2.2% as at 31 December 2024 (down 10 bps y-o-y).

Deposits

- Client deposits and notes amounted to GEL 25,341.7 million as at 31 December 2024 (up 22.0% y-o-y).

Liquidity position

- Bank of Georgia continues to operate with robust liquidity levels. At 31 December 2024, the Bank's liquidity coverage ratio (LCR) stood at 138.6%, above the 100% minimum requirement. The net stable funding ratio (NSFR) also remained strong at 130.7% at 31 December 2024.

Capital position

- The Bank continues to operate with solid capital buffers. At 31 December 2024, the Bank's Basel III CET1, Tier 1, and Total capital adequacy ratios stood at 17.1%, 20.5%, and 22.1%, respectively, comfortably above the minimum regulatory requirements of 14.9%, 17.0%, and 19.9%, respectively.

Corporate governance framework

The Bank

The Bank's corporate governance structure includes the General Meeting of Shareholders (GMS), the Supervisory Board, and the Management Board, each with distinct responsibilities under Georgian law and the Bank's Charter. The GMS, as the highest governing body, appoints the Supervisory Board, which oversees corporate governance and supervises the Management Board, responsible for daily operations.

The Bank's ultimate parent, Lion Finance Group PLC, sets the Group's strategy. In line with Georgia's Corporate Governance Code for Commercial Banks (Order #215/04 of the President of the NBG, dated 26 September 2018) (as amended)) ("**CGC**"), the Supervisory Board has four committees: Audit, Risk, Nomination & Corporate Governance, and Remuneration Committee, ensuring effective oversight. Previously the list of the committees also included the Special Committee, initially established per regulatory requirements to oversee post-demerger processes in 2018, however it was dissolved in late 2024, with regulatory agreement after its purpose was fulfilled.

Lion Finance Group PLC

As an ultimate parent company, LFG PLC's Board of Directors oversees strategy, risk management, and internal controls. It includes Non-Executive Directors from the Bank's Supervisory Board, the Bank's General Director as Group CEO and Executive Director, and the Supervisory Board Chairman as LFG Chairman.

Lion Finance Group follows a mirror board structure, where the same members serve on both the LFG Board and the Bank's Supervisory Board, with identical roles in Audit, Risk, Nomination, and Remuneration Committees. This structure ensures effective governance across the Group.

Shareholder Engagement and Functions of GMS

As per the Charter, the annual General Meeting of Shareholders (GMS) is held at least once a year, within three months after the annual audit. If a GMS is convened, details are published on the Bank's website and public registry portal at least 21 days in advance.

The GMS agenda includes approval of the annual report, financial accounts, dividend distribution proposals, capital policy, and other matters raised by the Management Board, Supervisory Board, or shareholders, in line with Georgian law and the Charter.

GMS Quorum

- First GMS: Requires at least 50% of voting shares or representatives.

- If no quorum: A second GMS is called with the same agenda, requiring at least 25% attendance.
- If still no quorum: A third GMS is held, which proceeds regardless of attendance.

Extraordinary GMS (EGMS)

An EGMS can be called by the Management Board, Supervisory Board, or shareholders holding at least 5% of issued shares. Shareholders with 5% or more may request an EGMS one month after the last GMS, with the Management Board publishing the decision within 10 days.

Matters Reserved for Shareholders

Under Georgian law and the Charter, shareholder authority includes:

- Charter amendments and Bank reorganization
- Bank liquidation and appointment of a liquidator
- Approval of financial reports, audit selection, and dividend distribution
- Changes to capital and share redemption
- Election, removal, and remuneration of Supervisory Board members
- Legal action decisions against management
- Approval of major transactions (exceeding 50% of the Bank's asset value)

All other decisions fall under the authority of the Supervisory Board and Management Board.

Regulation of Bank Shareholders under NBG Rules

Under the Banking Law, individuals convicted of serious crimes cannot hold more than 10% of a commercial bank's share capital. The NBG may impose additional compliance requirements.

Anyone acquiring over 10%, 25%, or 50% must obtain NBG approval, which is issued within one to three months. Transactions exceeding 10% without approval are null and void. The NBG can request disclosure of shareholders over 10%, suspend voting rights, or require share reductions if financial stability is at risk.

Shareholders reducing holdings below 10%, 25%, or 50% must notify the NBG. Banks must quarterly disclose direct shareholders over 1% and beneficial owners over 5%. Shareholders over 10% must annually declare their holdings.

The Supervisory Board and Its Committees

The Supervisory Board is collectively responsible for the Bank's long-term success, setting its strategy, overseeing risk management and internal controls, and ensuring sustainable value for shareholders. It upholds corporate governance best practices and considers the interests of stakeholders, including employees, customers, and the broader community.

The management's execution of strategy and financial performance are also monitored. While the ultimate focus is long-term growth, the Bank also needs to deliver on short-term objectives and thus seeks to ensure that management strikes the right balance between the two. The Bank is mindful of its wider obligations and considers the impact its decisions will have on the Bank's various stakeholders, such as employees, customers, the environment and communities where the Group operates. In order to ensure that the Bank meets its responsibilities, specific key decisions have been reserved for approval by the Supervisory Board. In addition, the Supervisory Board receives reports and recommendations from time to time on any matter which it considers significant to the Bank.

The Supervisory Board approves the Credit Policies, which outline credit risk control and monitoring procedures and the Bank's credit risk management systems, and approves certain decisions that fall outside the scope of the respective authorities of the Credit Committees (Including approval of Loans and other Liabilities for the client groups with more than US$ 70.0 million exposures). The Management Board presents a comprehensive credit risk report and market risk report to the Supervisory Board for its review on a quarterly basis.

The Board has ultimate supervisory responsibility for the management of risk. The Chief Risk Officer is responsible for the risk management framework. This includes establishing policy, monitoring risk profiles, and identifying and managing risk. Bank of Georgia operates based on the industry standard three-lines-of-defence model. All roles below the Chief Executive fall within one of the three lines, and all employees are responsible for understanding and managing risks within their individual roles and responsibilities.

The Supervisory Board is responsible for reviewing the Bank's system of internal controls and confirming its adequacy and effectiveness. The Audit and Risk Committees play key roles in assessing the strength and effectiveness of the risk management and internal control systems.

With respect to internal controls over financial reporting, our financial procedures include a range of system, transactional and management oversight controls. Each quarter, the CFO and other members of the Finance team discuss financial reporting and associated internal controls with the Audit Committee, which reports significant findings to the Supervisory Board. The Audit Committee also reviews quarterly, half-year and full-year financial statements and corresponding results announcements, and advises the Supervisory Board.

The external auditor and Head of Internal Audit attend Audit Committee meetings, and the Audit Committee meets them regularly both with and without the presence of Executive Management. Our Audit and Risk Committees monitor internal controls over operational and compliance risks.

The Supervisory Board approves risk appetite, key policies, and reviews quarterly risk reports. It also ensures that ESG matters are integrated into the Bank's strategy.

The Supervisory Board's competences and duties are governed by the Bank's Charter, a public document accessible via webpage of LEPL National Agency of Public Registry of Georgia. This includes responsibilities related to management oversight, strategic decision-making, risk management, and governance structures. The Board meets quarterly, with additional meetings as needed, and receives updates from senior management, risk, audit, and legal functions.

Committees

The Supervisory Board has delegated authority to various Committees to manage specific tasks and ensure efficient operations, independent oversight, and consideration of financial, audit, internal control, and risk issues. The Charter outlines key responsibilities, and the Committees' activities are regularly reviewed. All Supervisory Board members are invited to attend Committee meetings. The committees are:

Audit Committee: Oversees the Bank's financial reporting, internal and external audits, and risk management processes. It specifically oversees and challenges management on its internal control and risk management systems in relation to the financial reporting process. The Audit Committee meets quarterly, with extraordinary meetings if needed.

Members: Jonathan Muir (Chair), Hanna Loikkanen, Cecil Quillen

Risk Committee: Focuses on risk oversight, reviewing the Bank's risk appetite, exposure, and policies. It monitors critical risks like credit, market, and operational risks. The Risk Committee reviews the Bank's risk policies on a regular basis, usually quarterly, cooperates and monitors the activities of the Chief Risk Officer, provides recommendations to the Supervisory Board regarding the risk strategies and effectiveness of the policies and in conjunction with the Audit Committee, assesses the strength and effectiveness of the risk management and internal control framework.

Members: Véronique McCarroll (Chair), Tamaz Georgadze, Mariam Megvinetukhutsesi

Nomination and Corporate Governance Committee: Reviews Supervisory Board composition and succession planning, ensuring diversity and balance. It also assesses the Board's effectiveness.

Members: Mel Carvill (Chair), Jonathan Muir, Hanna Loikkanen, Cecil Quillen, Véronique McCarroll, Tamaz Georgadze, Mariam Megvinetukhutsesi

Remuneration Committee: Recommends remuneration policies for executives, ensuring alignment with long-term success and shareholder interests.

Members: Cecil Quillen (Chair), Mel Carvill, Hanna Loikkanen, Tamaz Georgadze

Previously the list of the committees also included the Special Committee, initially established per regulatory requirements to oversee post-demerger processes in 2018, however it was dissolved in late 2024, with regulatory agreement after its purpose was fulfilled.

Supervisory Board Composition, Diversity, and Independence

The company is committed to fostering a diverse and inclusive environment, recognizing that diversity enhances effective governance and decision-making. To reinforce this commitment, the company has adopted a dedicated Diversity & Inclusion Policy, ensuring a balanced and inclusive approach to leadership and decision-making. The policy follows a structured methodology, incorporating both qualitative and quantitative criteria to assess diversity, including gender, professional background, skills, and experience, ensuring a well-balanced and inclusive leadership approach.

The Supervisory Board considers that the overall size and composition of the Supervisory Board is appropriate, considering the independence of character and integrity of all members. Each of the Supervisory Board members occupies, and/or has previously occupied, senior positions in a broad range of relevant associated sectors, bringing valuable insights to the Board's deliberations and contributing significantly to decision-making. No individual, or group of individuals, can dominate the decision-making process and no undue reliance is placed on any individual.

The independence of each member of the Supervisory Board is assessed and the Bank is of the opinion that each of them acts in an independent and objective manner and therefore, under the Banking Law in Georgia, is independent and free from any relationship that could affect their judgment. Each Supervisory Board member has an ongoing obligation to inform the Supervisory Board of any circumstances which could impair their independence.

As at 31 December 2024, the Supervisory Board consisted of seven members following Alasdair Breach's resignation. Board members serve three-year terms and are reappointed without restrictions. The Bank values diversity in skills, experience, gender, and nationality. At the end of 2024, 43% of the Supervisory Board were women, and six nationalities were represented. The Board follows the CGC, ensuring at least 40% gender diversity and that at least one-third of members are independent. Each member's independence is assessed regularly.

Supervisory Board and Committee Meeting Attendance

Member	Supervisory Board	Audit Committee	Risk Committee	Nomination and Corporate Governance Committee	Remuneration Committee
Mel Carvill	8/8 scheduled and 7/7 ad hoc	N/A	N/A	4/4 scheduled	4/4 scheduled and 3/3 ad hoc

Tamaz Georgadze	8/8 scheduled and 7/7 ad hoc	N/A	4/4 scheduled and 1/1 ad hoc	4/4 scheduled	4/4 scheduled and 3/3 ad hoc
Hanna Loikkanen	8/8 scheduled and 7/7 ad hoc	4/4 scheduled and 5/5 ad hoc	N/A	4/4 scheduled	4/4 scheduled and 3/3 ad hoc
Véronique McCarroll	8/8 scheduled and 7/7 ad hoc	N/A	4/4 scheduled and 1/1 ad hoc	4/4 scheduled	N/A
Mariam Megvinetukhutsesi	8/8 scheduled and 7/7 ad hoc	N/A	4/4 scheduled and 1/1 ad hoc	4/4 scheduled	N/A
Jonathan Muir**	8/8 scheduled and 6/7 ad hoc	4/4 scheduled and 4/5 ad hoc	N/A	4/4 scheduled	N/A
Cecil Quillen	8/8 scheduled and 7/7 ad hoc	4/4 scheduled and 5/5 ad hoc	N/A	4/4 scheduled	4/4 scheduled and 3/3 ad hoc
Alasdair Breach*	2/2 scheduled and 3/3 ad hoc	N/A	1/1 scheduled	1/1 scheduled	1/1 scheduled and 1/1 ad hoc

*Alasdair Breach retired on 15 March 2024

** Jonathan Muir was unable to attend two ad hoc meetings during the year due to pre-existing commitments. He had access to all relevant materials prior to the meeting and provided comments prior to and after the meeting.

Committee meeting topics during 2024

Key Audit Committee meeting topics during 2024 were:

March	June	September	December
• Internal Audit performance. • Internal Audit KPIs and KBOs. • Internal Audit plan progress and findings. • Compliance with new Global Internal Audit Standards. • Internal Audit Plan. • Finance and accounting update, including external audit tender and Ameriabank acquisition accounting. • Ongoing litigation update. • 2023 Management Report and Accounts • External Auditor update including non-audit fees.	• Internal Audit progress and findings. • Internal Audit Plan update. • New Global Internal Audit Standards update. • Finance and accounting update, including external audit findings and repossessed assets valuation approach. • Ongoing litigation update. • External Auditor update, including interim reporting and external audit tender.	• Internal Audit progress and findings. • New Global Internal Audit Standards update. • Internal quality assessment. • Finance and accounting update, including valuation approach and external audit tender. • Ongoing litigation update. • External Auditor update. • External Auditor effectiveness review. • Committee effectiveness review.	• Internal Audit progress and findings. • Internal Audit Plan and budget. • Internal Audit engagement results. • New Global Internal Audit Standards update. • Internal quality assessment. • Finance and accounting update, including stress testing. • Ongoing litigation update. • External Auditor update, including the external audit plan, fees and independence. • NBG data protection requirements. • External audit tender update. • Data protection update.

Key Risk Committee meeting topics during 2024 were:

March	June	September	December
• Risk Report. • Risk Appetite statement, metrics, annual re-approval and introduction of additional AML metrics. • Information security risk management. • Approval of financial risk policies. • 2024 risk KBOs.	• Risk Report. • Stress-testing framework. • Impact of current geopolitical environment on risk. • ICAAP and ILAAP reports. • Resolution plan update. • Risk culture survey.	• Risk Report. • Current risk outlook. • Committee effectiveness review.	• Risk Report. • Corporate loan book deep-dive analysis. • International sanctions risk update. • Liquidity update. • Environment, social and climate risk methodology update. • Stress testing.

Key Nomination and Corporate Governance Committee meeting topics during 2024 were:

March	June	September	December
• The NBG Supervisory Board member independence rule. • Board succession planning. • Employee Voice meeting update. • Progress of external evaluation actions.	• Board skills matrix. • Board composition. • Board diversity. • Board succession planning. • Internal evaluation process. • Progress of external evaluation actions.	• Board skills matrix. • Board succession planning. • Executive management succession planning. • Board composition changes. • Management promotion. • Workforce diversity. • Internal evaluation results. • Committee effectiveness review.	• Board succession planning. • Board composition. • Executive management succession planning and skills analysis. • Management promotions. • ESG oversight. • Board and executive management diversity. • Audit and Risk Committee cross-membership. • Internal evaluation actions review.

Key Remuneration Committee meeting topics during 2024 were:

February/March	April/June	September	December
• CEO Performance review against KPIs. • Senior management bonuses. • Employee bonus overview. • 2024 KPIs and targets set.	• Remuneration policies • KPI discussion.	• Remuneration policies. • CEO contract terms. • Committee Effectiveness review.	• Review of Employment Market Analysis on Salaries and Pay Practices.

Succession Planning and Board Appointment Procedures

Supervisory Board members are appointed by cumulative voting at the GMS. Shareholders can recommend candidates, but certain individuals (e.g., convicted of crimes) cannot be elected. The Nomination Committee ensures the Board maintains the right balance of skills, diversity, and experience, and manages succession planning. In 2024, the Committee reviewed Board composition, tenure, and diversity, focusing on future retirements and ensuring compliance with independence requirements.

Induction, Training, and Development

New Supervisory Board members undergo an induction program, covering their roles, legal obligations, and Board functions. Ongoing training is provided throughout the year, including updates on regulatory changes, such as those related to conflicts of interest, ESG guidelines, and data protection. Supervisory Board members also have access to independent professional advice, funded by the Bank.

Evaluation of the Supervisory Board's Performance

The Supervisory Board continually evaluates its performance to enhance its effectiveness. Apart from the annual self-evaluation, the members of the Supervisory Board are subject to mandatory external effectiveness evaluation performed by an independent third party. The latest external evaluation was conducted in 2023. There has been no external evaluation of the Supervisory Board for 2024.

Management Board and the Executive Management Team of the Bank

As at the date of this report, information on members of Bank of Georgia's Management Board and Executive Management, their roles and responsibilities as well as their professional backgrounds is accessible via Bank website at https://bankofgeorgia.ge/en/about/management.

The Management Board of Bank of Georgia comprises the following individuals:

Management Board member	Current position
Archil Gachechiladze	General Director
Sulkhan Gvalia	Deputy General Director, Chief Financial Officer
David Chkonia	Deputy General Director, Chief Risk Officer
David Davitashvili	Deputy General Director, Data and Information Technology
Mikheil Gomarteli	Deputy General Director, Strategic Project Direction
Eter Iremadze	Deputy General Director, Premium Banking
Zurab Kokosadze	Deputy General Director, Corporate Banking

The business address for all the Management Board members is 29a Gagarini Street, Tbilisi 0160, Georgia.

The directors are nominated by the General Director and are evaluated and approved by the Supervisory Board, subject to, in case of Deputy General Directors, regulatory clearance. The selection process focuses on expertise, integrity, and diversity to ensure effective governance. Regular reviews help maintain a well-balanced and skilled Management Board. The General Director and the members of the Supervisory Board assess and discuss the performance of each member of the Management Board as well as broader Executive Management and due attention is given to the areas of development and improvement for each of such directors, both in terms of hard and soft skills.

Responsibilities of the Management Board

The Management Board and the broader Executive Management Team are responsible for the day-to-day management of the Bank, with specific functions outlined in the Charter. Except for *ad hoc* delegations, the powers and duties of the Management Board and the Supervisory Board are clearly defined as per Georgian banking laws as well as the Charter and internal governing documents of the Bank. Any *ad hoc* delegation is duly recorded and kept in the minutes of the Supervisory Board. The Management Board is accountable to the shareholders and the Supervisory Board, and its members are appointed and dismissed by the Supervisory Board. The Supervisory Board of the Bank approves the remuneration and other conditions of employment for each member of the Management Board of the Bank. Certain resolutions of the Management Board of the Bank are subject to prior approval of the Supervisory Board of the Bank.

Key Responsibilities of the Management Board:

- Oversee the Bank's daily operations
- Prepare agenda items for the GMS and Supervisory Board meetings, draft resolutions, and provide necessary information
- Present the business plan, budget, profit and loss forecast, and investment plans to the Supervisory Board for approval
- Manage lending, settlement, financing, cash services, security, accounting, reporting, and internal controls
- Make decisions on branch and service center operations and ensure proper task fulfillment by branch managers
- Review internal audit and external inspection reports and make decisions
- Implement resolutions from the GMS and Supervisory Board
- Develop and enforce policies and regulatory documents
- Manage recruitment, training, and remuneration of employees
- Convene extraordinary general meetings when necessary

- Other tasks assigned by the Supervisory Board or GMS
- Ensure compliance with the Bank's Charter and applicable laws

Role of the General Director

The General Director leads the Management Board and is responsible for:

- Acting independently on behalf of the Bank (subject to Supervisory Board consent)
- Chairing Management Board meetings
- Supervising the implementation of decisions by the Management Board, Supervisory Board, and GMS
- Assigning tasks to Management Board members and issuing relevant directives
- Submitting recommendations on employee remuneration and bonuses for Supervisory Board approval
- Appointing and dismissing employees as per the recruitment plan
- Delegating tasks as needed to other Management Board members or department heads

Along with the powers and duties of the Management Board, approval of the Supervisory Board is required for:

- Major acquisitions, disposals, or transactions exceeding specific thresholds (e.g., stakes, real estate, investments, borrowing)
- Establishment or liquidation of branches
- Major changes to banking activities
- Adoption of business strategy, budget, and development plans
- Approval of significant contracts or expenditures
- Determination of top management remuneration
- Determining and approving internal policies for lending, investing, asset management, etc.
- Redemption of Bank's shares as per applicable laws

Share buybacks

During the year neither the Bank, nor the Group has acquired the shares of JSC Bank of Georgia. Sanne Fiduciary Services Limited (the "Trustee") acts as the trustee of the Group's Executives' Equity Compensation Plan ("EECP"). The Group makes contributions to the Trustee in respect of the awards granted within EECP. JSC BGEO Group has the legal obligation to settle the awards. In granting the awards, the Bank acts as the agent of the parent and the ultimate parent.

In 2019, the Group set up Employee Equity Compensation Trustee – Sanne Fiduciary Services Limited (the "Trustee") which acts as the trustee of the Group's Employees' Equity Compensation Plan ("EECP").

In 2024, the Group contributed GEL 77.4 million (2023: GEL 109.7 million; 2022: GEL 71.9 million) as intra-group recharge under share-based compensation schemes described above.

Financial reporting procedures and risk management

Financial reporting procedures of the Group and the Bank are centralised and are managed and monitored by the Finance Department of the Bank and Group Budgeting and Reporting. Each subsidiary has a designated financial reporting team. Their function and performance are coordinated and controlled by the Group Reporting team. The overall monitoring of the process is led by the Bank's CFO. The Bank's and the Group's financial reporting procedures are aimed at producing annual full set and interim condensed separate and consolidated financial statements in accordance with IFRS and EU IFRSs. In 2007, the Group issued financial reporting procedures manual, which is a set of instructions and templates prescribing the key components, key rules, procedures and deadlines for preparing financial statements. The manual is regularly updated based on the changes in the Group or in reporting standards. The process of financial reporting starts at subsidiary level. Finance departments of each subsidiary prepare respective full package financial reports, which are then reviewed and finally approved by subsidiary CFOs. Financial reports and information packages of the subsidiaries are further submitted to the Group Budgeting and Reporting team, which reviews the reports and consolidates them into the Group's and the Bank's financial Statements. Consolidated full package report is reviewed and approved by the Bank's CFO.

Following the CFO approval, financial statements are reviewed by the Management Board, the Audit Committee and the Risk Committee, the Supervisory Board and external auditors. The Bank's and the Group's financial statements are authorised for issuance by the Management Board, Audit Committee and the Supervisory Board.

Internal Audit Department of the Bank and the Group regularly reviews financial reports and financial statements of the Bank and the Group and provides Finance Department and Group Reporting and Budgeting team with review points and suggestions for improvement

Management Board statement

The Management Board is responsible for preparing the Management Report and the Consolidated Financial Statements in accordance with applicable law and regulations. We consider that the Management Report and the Consolidated Financial Statements taken as a whole, are fair, balanced and understandable and give shareholders the information needed to assess the Group's position and performance, business model and strategy.

By order of the Supervisory Board and Management Board:

Archil Gachechiladze	Mel Carvill
General Director	Chairperson
14 May 2025	14 May 2025

Internal Audit Department of the Bank and the Group regularly reviews financial reports and financial statements of the Bank and the Group and provides Finance Department and Group Reporting and Budgeting team with review points and suggestions for improvement

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By order of the Supervisory Board and Management Board:

Archil Gachechiladze
General Director
14 May 2025

Mel Carvill
Chairperson
14 May 2025

Glossary

Alternative performance measures (APMs) In this announcement the management uses various APMs, which they believe provide additional useful information for understanding the financial performance of the Group. These APMs are not defined by International Financial Reporting Standards, and also may not be directly comparable with other companies who use similar measures. We believe that these APMs provide the best representation of our financial performance as these measures are used by management to evaluate the Group's operating performance and make day-to-day operating decisions;

Operational terms

Active merchant A merchant that has executed at least one transaction within the past month;

Monthly active user – retail or business (MAU) Number of customers who satisfied predefined activity criteria within the past month;

Monthly active digital user (Digital MAU) A user with at least one login within past month in BOG APP/iBank/sCoolApp;

Digital daily active user (Digital DAU) Average daily number of retail customers who logged into our BOG APP/iBank/ sCoolApp at least once within the past month;

Payment MAU Number of Bank's retail customers who made at least one payment with a BOG card within the past month;

Ratio definitions

Basic earnings per share Profit for the year attributable to shareholders of the Group divided by the weighted average number of outstanding ordinary shares over the same year;

Book value per share Total equity attributable to shareholders of the Group divided by ordinary shares outstanding at year end; net ordinary shares outstanding equals total number of ordinary shares outstanding at year end less number of treasury shares at year end;

Constant currency basis Changes assuming constant exchange rate. To calculate the y-o-y growth without the currency exchange rate effect, we used the exchange rates of relevant currencies to GEL as of 31 December 2023;

Cost of deposits Interest expense on client deposits and notes of the period divided by monthly average client deposits and notes;

Cost of funds Interest expense of the year divided by monthly average interest-bearing liabilities;

Cost of credit risk Expected loss/impairment charge for loans to customers and finance lease receivables for the year divided by monthly average gross loans to customers and finance lease receivables over the same year;

Cost:income ratio Operating expenses divided by operating income;

Gross loans to customers Throughout this Report are presented net of ECL on contractually accrued interest income;

Interest-bearing liabilities Amounts owed to credit institutions, client deposits and notes, and debt securities issued;

Interest earning assets (excluding cash) Amounts due from credit institutions, investment securities (but excluding corporate shares) and net loans to customers and finance lease receivables;

Leverage (times) Total liabilities divided by total equity;

Liquid assets Cash and cash equivalents, amounts due from credit institutions and investment securities;

Liquidity coverage ratio (LCR) High-quality liquid assets (as defined by NBG) divided by net cash outflow over the next 30 days (as defined by NBG). Calculations are made for Bank of Georgia standalone, based on IFRS;

Loan yield Interest income from loans to customers and finance lease receivables divided by monthly average gross loans to customers and finance lease receivables;

NBG (Basel III) Common Equity Tier 1 (CET1) capital adequacy ratio Common Equity Tier 1 capital divided by total risk-weighted assets, both calculated in accordance with the requirements of the National Bank of Georgia. Calculations are made for Bank of Georgia standalone, based on IFRS;

NBG (Basel III) Tier 1 capital adequacy ratio Tier 1 capital divided by total riskweighted assets, both calculated in accordance with the requirements of the National Bank of Georgia. Calculations are made for Bank of Georgia standalone, based on IFRS;

NBG (Basel III) Total capital adequacy ratio Total regulatory capital divided by total risk-weighted assets, both calculated in accordance with the requirements of the National Bank of Georgia. Calculations are made for Bank of Georgia standalone, based on IFRS;

Net interest margin (NIM) Net interest income for the year divided by monthly average interest earning assets excluding cash and cash equivalents and corporate shares for the same year;

Net stable funding ratio (NSFR) Available amount of stable funding (as defined by NBG) divided by the required amount of stable funding (as defined by NBG). Calculations are made for Bank of Georgia standalone, based on IFRS;

Net loans In all sections of the Report, except for the consolidated audited financial statements, net loans are defined as gross loans to customers and finance lease receivables less allowance for expected credit loss;

Non-performing loans (NPLs) The principal and/or interest payments on loans overdue for more than 90 days; or the exposures experiencing substantial deterioration of their

creditworthiness and the debtors assessed as unlikely to pay their credit obligation(s) in full without realisation of collateral;

NPL coverage ratio Allowance for expected credit loss on loans to customers and finance lease receivables divided by NPLs;

NPL coverage ratio adjusted for discounted value of collateral Allowance for expected credit loss on loans to customers, finance lease and factoring receivables, plus the discounted value of collateral for the NPL portfolio (capped at the respective loan amount), divided by total NPLs;

One-off items Significant items that do not arise during ordinary course of business;

Operating leverage Percentage change in operating income less percentage change in operating expenses;

Return on average total assets (ROAA) Profit for the year divided by monthly average total assets for the same year;

Return on average total equity (ROAE) Profit for the year attributable to shareholders divided by monthly average equity attributable to shareholders for the same year;

Weighted average number of ordinary shares Average of daily outstanding number of shares less daily outstanding number of treasury shares;

Weighted average diluted number of ordinary shares Weighted average number of ordinary shares plus weighted average dilutive number of shares known to management during the same year;

NMF Not meaningful.

Executive management functions

CEO Chief Executive Officer

CFO Chief Financial Officer

CLO Chief Legal Officer

CMO Chief Marketing Officer

CRO Chief Risk Officer

References

The Bank	**JSC Bank of Georgia**
LFG PLC	Lion Finance Group PLC
The Board of Directors	The Board of Directors of LFG PLC
The Directors	Members of the LFG PLC Board of Directors
The Group	JSC Bank of Georgia and its subsidiaries
The Report	Management Report of the Group

The Charter	The charter of JSC Bank of Georgia
GMS	General Meeting of Shareholders
NBG Code	The Code of Corporate Governance for the Commercial Banks, adopted by the Decree of President of the National Bank of Georgia, #215/04 of 26 September 2018, as amended.
IFRS	International Financial Reporting Standards
Supervisory Board	Supervisory Board of the Bank (or "the Board)
Management Board	Management Board of the Bank (General Director also referred to as CEO and Deputy General Directors also referred to as Deputy CEOs)
Executive Management team	Refers to Management Team of the Bank as presented on the Bank's website at https://bankofgeorgia.ge/en/about/management
We/Our/Us	References to "we", "our" or "us" are primary references to the Group throughout this Report. However, the Group comprises and operates through its subsidiaries which are legal entities with their own relevant management and governance structure (as set out in relevant parts of this Report). In that regard, when using "we", "our" or "us" in the context of banking business in Georgia, we refer to JSC Bank of Georgia, unless otherwise specifically indicated in this Management Report.

JSC Bank of Georgia and Subsidiaries
Consolidated Financial Statements

31 December 2024
Together with Independent Auditor's Report

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Independent auditor's report

To the Shareholders and the Supervisory Board of JSC Bank of Georgia

Report on the audit of the consolidated financial statements

Opinion

We have audited the consolidated financial statements of JSC Bank of Georgia and its subsidiaries (hereinafter, the "Group"), which comprise the consolidated statement of financial position as at 31 December 2024, and the consolidated statement of comprehensive income, consolidated statement of changes in equity and consolidated statement of cash flows for the year then ended, and notes to the consolidated financial statements, including material accounting policy information.

In our opinion, the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of the Group as at 31 December 2024 and its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRSs).

Basis for opinion

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

Key audit matters

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

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

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Key audit matter	How our audit addressed it
Allowance for expected credit loss and application of IFRS 9 'Financial instruments'	
The ECL provision is calculated using a combination of a collective provisioning model and specific loan provisions based on discounted cash flow analyses and regression-based forward-looking estimates. The allowance for expected credit loss is highly judgemental and changes in assumptions could have a material impact on reported profits. Both collective and specific provisioning depend on a number of assumptions and judgements including: ▸ allocation of loans to stage 1, 2, 3 or Purchased and Originated Credit-Impaired ('POCI') using criteria set in accordance with IFRS 9 'Financial Instruments'; ▸ accounting interpretations and modelling assumptions used to build and run the models for calculating the expected credit loss ('ECL'); ▸ inputs and assumptions used to estimate the impact of multiple economic scenarios, including weightings applied; ▸ estimation of probability of default ('PD'), loss given default ('LGD') and exposure at default ('EAD'), including the valuation of collateral; and ▸ measurement of individually assessed provisions, including expected future cash flows and the valuation of collateral. There are also risks related to: ▸ the accuracy and completeness of underlying loan data used in the ECL model; and ▸ the accuracy and adequacy of financial statement disclosures.	▸ We obtained an understanding, performed walkthroughs and evaluated the design and operating effectiveness of key controls across the processes relevant to the ECL. This includes controls over data accuracy and completeness, credit monitoring, allocation of borrowers into their respective impairment stages, individual provisioning and production of journal entries and disclosures. ▸ Using our IFRS 9 specialists, we assessed and challenged the Group's IFRS 9 provisioning methodology to determine whether the accounting standard had been complied with consistently and any changes made to the methodology were appropriate. ▸ Using our modelling specialists, we tested the assumptions, inputs and formulae used in the ECL model to confirm that the model was consistent with the stated methodology. This included assessing the appropriateness of the model design and formulae used, and recalculating the PD, LGD and EAD, on a sample basis. ▸ We engaged specialists to perform a detailed review and testing of the changes made in the models. We performed a recalculation of the ECL on a sample basis, including procedures over staging and underlying risk parameters. ▸ We assessed the appropriateness of the macroeconomic scenarios used by management and tested whether they had been properly applied in the ECL calculations. ▸ We tested the completeness and accuracy of key data inputs used in the ECL model by reconciling loans and advances between the underlying source systems and the ECL model.

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Key audit matter	How our audit addressed it
As a consequence of the judgement involved in establishing the allowance, there is a greater risk of misstatement in ECL charges, either by fraud or error, including through the potential override of controls by management. The level of risk remains consistent with the prior year. Information on the impairment of loans to customers is included in Note 9, *Loans to Customers* and Note 27, *Risk Management*, to the consolidated financial statements.	▸ We challenged the criteria used to allocate assets to stage 1, 2, 3 or POCI in accordance with IFRS 9, to determine SICR and staging. For a sample of loans, we independently assessed whether they had been allocated to the appropriate stage, considering potential indicators of significant increase in credit risk or default and challenged management as to the rationale for movements between stages. ▸ We performed procedures to address the existence and valuation of collateral for loans where expected cash flows from the realization of collateral were impacting the estimation of loan losses. Involving our valuation specialists, we assessed the reasonableness of valuation methodology of collateral. ▸ We evaluated the adequacy and appropriateness of disclosures related to ECL for compliance with the requirements of IFRS.

Other information included in the Group's 2024 Management Report

Other information consists of the information included in Group's 2024 Management Report, other than the consolidated financial statements and our auditor's report thereon. Management is responsible for the other information. The Group's 2024 Management Report is expected to be made available to us after the date of this auditor's report.

Our opinion on the consolidated financial statements does not cover the other information and we will not express any form of assurance conclusion thereon in our report on the audit of the consolidated financial statements.

In connection with our audit of the consolidated financial statements, our responsibility is to read the other information identified above when it becomes available and, in doing so, consider whether the other information is materially inconsistent with the consolidated financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.

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Responsibilities of management and Audit committee for the consolidated financial statements

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

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

Audit committee are responsible for overseeing the Group's financial reporting process.

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

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

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

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

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- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group as a basis for forming an opinion on the consolidated financial statements. We are responsible for the direction, supervision and review of the audit work performed for the purposes of the group audit. We remain solely responsible for our audit opinion.

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

The partner in charge of the audit resulting in this independent auditor's report is Ruslan Khoroshvili.



Ruslan Khoroshvili (SARAS-A-615243)

On behalf of EY LLC (SARAS-F-855308)

30 April 2025

Tbilisi, Georgia

CONSOLIDATED STATEMENT OF FINANCIAL POSITION

For the year ended 31 December 2024

(Thousands of Georgian Lari)

	Notes	2024	2023	2022
Assets				
Cash and cash equivalents	6	2,278,476	3,042,832	3,495,728
Amounts due from credit institutions	7	2,456,690	1,752,658	2,417,306
Investment securities	8	7,826,790	4,880,815	4,343,749
Investment securities measured at amortised cost		1,910,479	524,108	378,537
Investment securities measured at fair value through other comprehensive income		5,916,311	4,356,707	3,965,212
Investment securities pledged under sale and repurchase agreements and securities lending	8	138,945	-	-
Investment securities pledged under sale and repurchase agreements and securities lending measured at fair value through other comprehensive income		138,945	-	-
Loans to customers, factoring and finance lease receivables	9	24,316,155	20,248,067	16,841,603
Accounts receivable and other loans	10	2,790	3,530	3,398
Prepayments		39,136	32,032	47,176
Foredosed assets	12	372,577	271,712	119,924
Right-of-use assets	10	163,104	134,422	115,404
Investment properties	11	140,737	127,924	170,629
Property and equipment	10	441,399	404,303	363,606
Investments in associates	4	569,137	9,537	9,249
Goodwill	13	33,453	33,453	33,453
Intangible assets	10	172,367	144,357	130,307
Income tax assets	14	46,058	464	864
Other assets	15	255,342	280,615	245,096
Assets held for sale		20,007	27,389	29,566
Total assets		**39,273,163**	**31,394,110**	**28,367,058**
Liabilities				
Client deposits and notes	16	25,341,733	20,776,816	18,274,061
Amounts owed to credit institutions	17	6,710,494	5,133,029	5,191,494
Debt securities issued	18	1,099,337	421,359	646,137
Lease liability	10	177,365	137,554	112,624
Accruals and deferred income		143,353	124,397	102,250
Income tax liabilities	14	21,054	199,058	99,533
Other liabilities	15	149,329	149,847	153,591
Total liabilities		**33,642,665**	**26,942,060**	**24,579,690**
Equity	20			
Share capital		27,994	27,994	27,994
Additional paid-in capital		140,779	151,336	190,033
Treasury shares		(11)	(11)	(10)
Other reserves		51,452	2,087	(4,304)
Retained earnings		5,410,284	4,270,644	3,573,655
Total equity attributable to shareholders of the Group		**5,630,498**	**4,452,050**	**3,787,368**
Non-controlling interests		-	-	-
Total equity		**5,630,498**	**4,452,050**	**3,787,368**
Total liabilities and equity		**39,273,163**	**31,394,110**	**28,367,058**

Signed and authorised for release on behalf of the Management Board and the Supervisory Board:

Archil Gachechiladze — Chief Executive Officer

Sulkhan Gvalia — Chief Financial Officer

Mel Carvill — Supervisory Board Chairman

30 April 2025

The accompanying Notes on pages 9 to 111 are an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF FINANCIAL POSITION

For the year ended 31 December 2024

(Thousands of Georgian Lari)

	Notes	*2024*	*2023*	*2022*
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Lease liability	10	177,365	137,554	112,624
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Total liabilities		**33,642,665**	**26,942,060**	**24,579,690**
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Share capital		27,994	27,994	27,994
Additional paid-in capital		140,779	151,336	190,033
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Other reserves		51,452	2,087	(4,304)
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Non-controlling interests		-	-	-
Total equity		**5,630,498**	**4,452,050**	**3,787,368**
Total liabilities and equity		**39,273,163**	**31,394,110**	**28,367,058**

Signed and authorised for release on behalf of the Management Board and the Supervisory Board:

Archil Gachechiladze — Chief Executive Officer

Sulkhan Gvalia — Chief Financial Officer

Mel Carvill — Supervisory Board Chairman

30 April 2025

The accompanying Notes on pages 9 to 111 are an integral part of these consolidated financial statements.

CONSOLIDATED INCOME STATEMENT

For the year ended 31 December 2024

(Thousands of Georgian Lari)

	Notes	2024	2023	2022
Interest income calculated using EIR method		3,329,299	2,715,232	2,223,455
Other interest income		9,142	14,053	20,573
Interest income		**3,338,441**	**2,729,285**	**2,244,028**
Interest expense		(1,464,937)	(1,123,038)	(1,051,700)
Deposit insurance fees		(30,757)	(20,247)	(17,717)
Net interest income	21	**1,842,747**	**1,586,000**	**1,174,611**
Fee and commission income		786,447	669,536	548,782
Fee and commission expense		(398,639)	(328,864)	(287,362)
Net fee and commission income	22	**387,808**	**340,672**	**261,420**
Net foreign currency gain		446,719	370,847	463,202
Net gains/(losses) on extinguishment of debt		12	564	(8,462)
Net other gains/(losses)	25	49,443	114,546	40,556
Operating income		**2,726,729**	**2,412,629**	**1,931,327**
Salaries and other employee benefits	23	(455,912)	(379,716)	(330,376)
Administrative expenses	23	(210,073)	(184,857)	(151,712)
Depreciation, amortisation and impairment	10	(118,144)	(110,740)	(95,977)
Other operating expenses		(6,034)	(3,642)	(3,603)
Operating expenses		**(790,163)**	**(678,955)**	**(581,668)**
Profit from associates	4	293,070	984	819
Operating income before cost of risk		**2,229,636**	**1,734,658**	**1,350,478**
Expected credit loss on loans to customers and factoring receivables	24	(83,675)	(124,009)	(129,704)
Expected credit loss on finance lease receivables	24	1,055	(2,762)	(3,208)
Other expected credit recovery / (loss)	24	(5,161)	3,117	(16,745)
Impairment charge on other assets and provisions		(14,383)	(18,317)	(18,007)
Cost of risk		**(102,164)**	**(141,971)**	**(167,664)**
Net operating income before non-recurring items		**2,127,472**	**1,592,687**	**1,182,814**
Net non-recurring items		-	-	(203)
Profit before income tax expense		**2,127,472**	**1,592,687**	**1,182,611**
Income tax expense	14	(289,573)	(258,968)	(190,607)
Profit for the year		**1,837,899**	**1,333,719**	**992,004**
Basic and diluted earnings per share	20	65.6800	47.6609	35.4492

The accompanying Notes on pages 9 to 111 are an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF COMPREHENSIVE INCOME

For the year ended 31 December 2024

(Thousands of Georgian Lari)

	Notes	2024	2023	2022
Profit for the year		**1,837,899**	**1,333,719**	**992,004**
Other comprehensive income/(loss)				
Other comprehensive income/(loss) to be reclassified to profit or loss in subsequent years:				
– Net change in fair value on investments in debt instruments measured at fair value through other comprehensive income (FVOCI)	8	20,845	26,381	29,683
– Realised gain on financial assets measured at FVOCI		(1,631)	(14,322)	(7,528)
–Change in allowance for expected credit losses on investments in debt instruments measured at FVOCI redassified to the consolidated income statement		2,513	1,041	7,379
– Gain (loss) from currency translation differences		9,266	(37,259)	(18,110)
– Equity-accounted investees – share of OCI	4	17,526	-	-
Net other comprehensive income/(loss) to be reclassified to profit or loss in subsequent years		**48,519**	**(24,159)**	**11,424**
Other comprehensive gain/(loss) not to be reclassified to profit or loss in subsequent years:				
– Revaluation of property and equipment redassified to investment property		1,144	-	-
– Net gain/(loss) on investments in equity instruments designated at FVOCI		911	1,775	(1,369)
Net other comprehensive gain/(loss) not to be reclassified to profit or loss in subsequent years		**2,055**	**1,775**	**(1,369)**
Other comprehensive income/(loss) for the year, net of tax		**50,574**	**(22,384)**	**10,055**
Total comprehensive income for the year		**1,888,473**	**1,311,335**	**1,002,059**

The accompanying Notes on pages 9 to 111 are an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF CHANGES IN EQUITY

For the year ended 31 December 2024

(Thousands of Georgian Lari)

	Share capital	*Additional paid-in capital*	*Treasury shares*	*Other reserves*	*Retained earnings*	*Total equity*
31 December 2021	**27,994**	**180,969**	**(10)**	**(24,070)**	**2,866,340**	**3,051,223**
Profit for the year	-	-	-	-	992,004	992,004
Other comprehensive income for the year	-	-	-	19,766	(9,711)	10,055
Total comprehensive income for the year	**-**	**-**	**-**	**19,766**	**982,293**	**1,002,059**
Increase in equity arising from share-based payments	-	80,955	-	-	-	80,955
Dividends to shareholders of the Bank (Note 20)	-	-	-	-	(274,978)	(274,978)
Contributions under share-based payment plan (Note 26)	-	(71,891)	-	-	-	(71,891)
31 December 2022	**27,994**	**190,033**	**(10)**	**(4,304)**	**3,573,655**	**3,787,368**
Profit for the year	-	-	-	-	1,333,719	1,333,719
Other comprehensive income for the year	-	-	-	6,391	(28,775)	(22,384)
Total comprehensive income for the year	**-**	**-**	**-**	**6,391**	**1,304,944**	**1,311,335**
Increase in equity arising from share-based payments	-	70,970	-	-	-	70,970
Purchase of treasury shares	-	-	(1)	-	-	(1)
Dividends to shareholders of the Bank (Note 20)	-	-	-	-	(607,955)	(607,955)
Contributions under share-based payment plan (Note 26)	-	(109,667)	-	-	-	(109,667)
31 December 2023	**27,994**	**151,336**	**(11)**	**2,087**	**4,270,644**	**4,452,050**
Profit for the year	-	-	-	-	1,837,899	1,837,899
Other comprehensive income for the year	-	-	-	49,365	1,209	50,574
Total comprehensive income for the year	**-**	**-**	**-**	**49,365**	**1,839,108**	**1,888,473**
Increase in equity arising from share-based payments	-	66,820	-	-	-	66,820
Dividends to shareholders of the Bank (Note 20)	-	-	-	-	(699,468)	(699,468)
Contributions under share-based payment plan (Note 26)	-	(77,377)	-	-	-	(77,377)
31 December 2024	**27,994**	**140,779**	**(11)**	**51,452**	**5,410,284**	**5,630,498**

The accompanying Notes on pages 9 to 111 are an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF CASH FLOWS

For the year ended 31 December 2024

(Thousands of Georgian Lari)

	Notes	2024	2023	2022
Cash flows from operating activities				
Interest received		3,215,331	2,692,111	2,286,511
Interest paid		(1,440,028)	(1,074,119)	(1,012,989)
Fees and commissions received		796,894	575,226	511,899
Fees and commissions paid		(398,639)	(291,356)	(287,362)
Net realised gain from foreign currencies		429,585	355,436	453,871
Recoveries of loans to customers previously written off	9	46,530	47,029	84,542
Other income received		18,792	14,006	16,933
Salaries and other employee benefits paid		(374,118)	(308,746)	(249,421)
General and administrative and operating expenses paid		(208,201)	(186,357)	(157,350)
Cash flows from operating activities before changes in operating assets and liabilities		**2,086,146**	**1,823,230**	**1,646,634**
Net (increase) decrease in operating assets				
Amounts due from credit institutions		(668,366)	608,407	(899,984)
Loans to customers, factoring and finance lease receivables		(4,056,899)	(3,697,647)	(2,477,673)
Prepayments and other assets		8,970	14,692	(51,870)
Foredosed assets		68,181	159,204	11,700
Net increase (decrease) in operating liabilities				
Amounts due to credit institutions		1,515,518	(51,309)	1,143,916
Debt securities issued		24,787	(45,673)	(15,142)
Client deposits and notes		4,116,402	2,455,281	5,478,689
Other liabilities		17,928	(44,500)	46,441
Net cash flows from operating activities before income tax		**3,112,667**	**1,221,685**	**4,882,711**
Income tax paid		(513,171)	(159,043)	(202,514)
Net cash flows from operating activities		**2,599,496**	**1,062,642**	**4,680,197**
Cash flows (used in) from investing activities				
Net (purchases) sales of investment securities		(2,855,320)	(497,814)	(1,832,499)
Purchase of investments in associates	4	(249,805)	-	-
Proceeds from sale of investment properties and assets held for sale		35,031	47,950	92,860
Proceeds from sale of property and equipment and intangible assets		164	195	3,157
Purchase of property and equipment and intangible assets		(156,974)	(139,623)	(108,052)
Dividends received		802	696	-
Net cash flows used in investing activities		**(3,226,102)**	**(588,596)**	**(1,844,534)**
Cash flows (used in) from financing activities				
Repurchase of debt securities issued	18	-	(20,980)	(617,194)
Repayment of the principal portion of the debt securities issued	18	(283,570)	(230,995)	(31,581)
Proceeds from Tier 2 notes issued	18	51,126	78,921	-
Proceeds from Additional Tier 1	17	800,970	-	148,120
Cash payments for the principal portion of the lease liability	18	(36,340)	(31,606)	(25,020)
Dividends paid		(697,960)	(606,779)	(274,345)
Contributions under share-based payment plan	26	(77,377)	(109,667)	(71,891)
Purchase of treasury shares		-	(1)	-
Net cash used in financing activities		**(243,151)**	**(921,107)**	**(871,911)**
Effect of exchange rates changes on cash and cash equivalents		105,149	(5,653)	37,858
Effect of expected credit losses on cash and cash equivalents		252	(182)	(334)
Net (decrease) increase in cash and cash equivalents		**(764,356)**	**(452,896)**	**2,001,276**
Cash and cash equivalents, beginning of the year	6	**3,042,832**	**3,495,728**	**1,494,452**
Cash and cash equivalents, end of the year	6	**2,278,476**	**3,042,832**	**3,495,728**

The accompanying Notes on pages 9 to 111 are an integral part of these consolidated financial statements.

1. Principal activities

JSC Bank of Georgia (the "Bank") was established on 21 October 1994 as a joint stock company ("JSC") under the laws of Georgia. The Bank operates under a general banking licence issued by the National Bank of Georgia ("NBG"; the Central Bank of Georgia) on 15 December 1994.

The Bank accepts deposits from the public and extends credit, transfers payments in Georgia and internationally, and exchanges currencies. Its main office is in Tbilisi, Georgia. At 31 December 2024, the Bank had 189 operating outlets in all major cities of Georgia (31 December 2023: 189, 31 December 2022: 211). The Bank's registered legal address is 29a Gagarini Street, Tbilisi 0160, Georgia. The Bank's identification number is 204378869.

As at 31 December 2024 Lion Finance Group PLC (former Bank of Georgia Group PLC) represented the ultimate parent company of the Bank. In 2023 the ultimate parent of the Group undertook internal reorganization process intended to optimise its subsidiaries holding structure. As a result, 99.56% shareholding of the Group was consolidated under JSC BGEO. There was no change in the Group's ultimate parent as a result of the reorganization. As at 31 December 2024, JSC Georgia Capital was the only shareholder of Lion Finance Group PLC holding more than 10% of the shares, with a stake of 19.23% (31 December 2023: 19.71%, 31 December 2022: 20.60%).

The Bank, its subsidiaries and a material associate operating in Armenia make up a group of companies (the "Group") mainly incorporated in Georgia, Belarus and Armenia. Primary business activities include providing banking services to corporate and individual customers. The Bank is the Group's main operating unit and accounts for most of the Group's activities.

As at 31 December 2024, 31 December 2023 and 31 December 2022, JSC BGEO Group ("JSC BGEO") was the principal shareholder of the Bank:

Shareholder	*31 December 2024*	*31 December 2023*	*31 December 2022*
JSC BGEO Group	99.56%	99.56%	79.78%
Lion Finance Group PLC	0.00%	0.00%	19.78%
Others*	0.44%	0.44%	0.44%
Total	**100.00%**	**100.00%**	**100.00%**

**** Shares listed on the Georgian Stock Exchange.***

2. Basis of preparation

General

The financial statements have been prepared in accordance with International Financial Reporting Standards ("IFRS") and International Financial Reporting Interpretations Committee ("IFRIC") interpretations issued by the International Accounting Standards Board ("IASB") effective for 2024 reporting.

The Bank and its Georgian-based subsidiaries are required to maintain their records and prepare their financial statements for regulatory purposes in Georgian Lari, while the Bank's subsidiaries established outside of Georgia are in their respective local currencies. These financial statements are prepared under the historical cost convention except for:

- the measurement at fair value of certain investment securities, derivative financial assets and liabilities, investment properties and certain other financial assets;
- the measurement of foreclosed assets at lower of cost and net realisable value; and
- the measurement of non-current assets classified as held for sale at lower of carrying amount and fair value less costs to sell.

The financial statements are presented in thousands of Georgian Lari ("GEL"), except per-share amounts and unless otherwise indicated.

Going concern

In adopting the going concern basis for preparing the consolidated financial statements, the Management Board has considered the Group's business activities, objectives and strategy, principal risks and uncertainties in achieving its objectives, and performance. The Management Board has performed a robust assessment of the Group's financial forecasts across a range of scenarios over 12 months from the date the financial statements are authorised for issue, by carrying out stress testing, incorporating extreme downside scenario and reverse stress testing, which involved examining the level of disruption that may cause the Group to fail. Based on this, the Management Board confirms that they have a reasonable expectation that the Bank and the Group, as a whole, have adequate resources to continue in operational existence for the 12-month from the date the financial statements are authorised for issue. Furthermore, management is not aware of any material uncertainties that may cast significant doubt upon the Group's ability to continue as a going concern for the foreseeable future. Therefore, the financial statements continue to be prepared on the going concern basis.

2. Basis of preparation (continued)

Impact of climate-related risks on the Group's financial position and performance

As described in Note 27 to the financial statements, the Group has identified Climate Risk as an emerging risk. However, qualitative analysis of the impact of climate change and low-carbon transitions on traditional banking risk and on the sectors in which the Groups clients were active lead us to believe that there is currently no material short (less than 2 years) to medium (2 to 5 years) term impact of climate change expected. The Group continues to refine its assessment of such risks and will re-assess whether the impact of climate-related risks on its financial position and performance need to be considered in future reporting periods.

Subsidiaries, associates and corporate shares with shareholdings above 10%

The consolidated financial statements as at 31 December 2024, 31 December 2023 and 31 December 2022 include the following subsidiaries, associates and corporate shares with shareholdings above 10%:

Subsidiaries	Proportion of voting rights and ordinary share capital held			Country of incorporation	Address	Industry	Date of incorporation	Date of acquisition	Legal form / Status
	31 December 2024	31 December 2023	31 December 2022						
Bank of Georgia Representative Office UK Limited	100.00%	100.00%	100.00%	United Kingdom	42 Brook Street, London, W1K 5DB	Information Sharing and Market Research	17/8/2010	–	Limited Liability Company
Tree of Life Foundation NPO (former Bank of Georgia Future Foundation, NPO)	100.00%	100.00%	100.00%	Georgia	3 Pushkin Street, Tbilisi 0105	Charitable activities	25/8/2008	–	Non-profit Organization
Bank of Georgia Representative Office Hungary (a)	100.00%	100.00%	100.00%	Hungary	1054 Budapest, Szabadság tér 7; Bank Center	Representative Office	18/6/2012	–	Representative Office
Representative Office of JSC Bank of Georgia in Turkey (b)*	N/A	100.00%	100.00%	Turkey	Süleyman Seba Caddesi No:48 A Blok Daire 82 Akaretler Beşiktaş 34357 Istanbul	Representative Office	25/12/2013	–	Representative Office
Georgia Financial Investments, LLC	100.00%	100.00%	100.00%	Israel	7 Menahem Begin, Ramat Gan 52681, Israel	Information Sharing and Market Research	9/2/2009	–	Limited Liability Company
Benderlock Investments Limited	100.00%	100.00%	100.00%	Cyprus	Arch. Makariou III 58, IRIS TOWER, 8th floor, Flat/Office 702 P.C. 1075, Nicosia	Investments	12/5/2009	13/10/2009	Limited Liability Company
Þ JSC Belarusky Narodny Bank (c)	99.98%	99.98%	99.98%	Belarus	Nezavisimosty Ave. 87A, Minsk, 220012	Banking	16/4/1992	3/6/2008	Joint Stock Company
Þ BNB Leasing, LLC	99.90%	99.90%	99.90%	Belarus	Nezavisimosty Ave. 87A, room 3, Minsk, 220012	Leasing	30/3/2006	3/6/2008	Limited Liability Company
Georgian Leasing Company, LLC	100.00%	100.00%	100.00%	Georgia	3-5 Kazbegi Str.,Tbilisi	Leasing	29/10/2001	31/12/2004	Limited Liability Company
Þ Prime Leasing	100.00%	100.00%	100.00%	Georgia	Didube-Chughureti district, №114, Ak. Tsereteli Ave., Tbilisi	Leasing	27/1/2012	21/1/2015	Limited Liability Company

Associates	Proportion of voting rights and			Country of incorporation	Address	Industry	Date of incorporation	Date of acquisition	Legal form / Status
	31 December 2024	31 December 2023	31 December 2022						
JSC Credit info	21.08%	21.08%	21.08%	Georgia	2 Tarkhnishvili St., Tbilisi, Georgia	Financial intermediation	14/2/2005	14/2/2005	Joint Stock Company
CJSC AMERIABANK	30.00%	N/A	N/A	Armenia	2 Vazgen Sargsyan Street, Yerevan 0010, Republic of Armenia	Banking	8/12/1992	31/3/2024	Closed Joint Stock Company

Investment securities, corporate shares	Proportion of voting rights and			Country of incorporation	Address	Industry	Date of incorporation	Date of acquisition	Legal form / Status
	31 December 2024	31 December 2023	31 December 2022						
JSC United Clearing Center	16.67%	16.67%	16.67%	Georgia	5/1 Sulkhan-Saba St., Tbilisi, Georgia	Electronic payment services	22/07/2008	15/09/2008	Joint Stock Company

(a) The investment has been fully impaired in standalone financial statements as at 31 December 2023 and 31 December 2022.
(b) JSC Bank of Georgia closed Representative office in Turkey on 24 August 2024.
(c) The presented amount is the total of investments made directly by JSC Bank of Georgia and Benderlock Investments Limited, at GEL 66,575 and GEL 37,836 , respectively.

3. Summary of significant accounting policies

Basis of consolidation

The Consolidated Financial Statements comprise the financial statements of the Group and its subsidiaries as at 31 December 2024. The Group consolidates a subsidiary when it controls it. Control is achieved when the Group is exposed, or has rights, to variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee. Specifically, the Group controls an investee if and only if the Group has:

- power over the investee (i.e. existing rights that give it the current ability to direct the relevant activities of the investee);
- exposure, or rights, to variable returns from its involvement with the investee; and
- the ability to use its power over the investee to affect its returns.

Consolidation of a subsidiary begins when the Group obtains control over the subsidiary and ceases when the Group loses control of the subsidiary. Income and expenses of a subsidiary acquired or disposed of during the year are included in the statement of comprehensive income from the date the Group gains control until the date the Group ceases to control the subsidiary.

Profit or loss and each component of other comprehensive income are attributed to the equity holders of the parent of the Group and to the non-controlling interests, even if this results in the non-controlling interests having a deficit balance. When necessary, adjustments are made to the financial statements of subsidiaries to bring their accounting policies into line with the Group's accounting policies. All intra-group assets and liabilities, equity, income, expenses and cash flows relating to transactions between members of the Group are eliminated in full on consolidation.

A change in the ownership interest of a subsidiary, without a loss of control, is accounted for as an equity transaction.

Business combinations and goodwill

Business combinations are accounted for using the acquisition method. The cost of an acquisition is measured as the aggregate of the consideration transferred, which is measured at acquisition date fair value, and the amount of any non-controlling interests in the acquiree.

Goodwill is initially measured at cost (being the excess of the aggregate of the consideration transferred and the amount recognized for non-controlling interests and any previous interest held over the net identifiable assets acquired and liabilities assumed). If the fair value of the net assets acquired is in excess of the aggregate consideration transferred, the Group re-assesses whether it has correctly identified all of the assets acquired and all of the liabilities assumed and reviews the procedures used to measure the amounts to be recognized at the acquisition date. If the reassessment still results in an excess of the fair value of net assets acquired over the aggregate consideration transferred, then the gain is recognized in profit or loss.

Investments in associates

Associates are entities in which the Group generally has between 20% and 50% of the voting rights, or is otherwise able to exercise significant influence over, but which it does not control or jointly control. Investments in associates are accounted for under the equity method and are initially recognised at higher of cost and the Group's share in identifiable net assets and liabilities. If the share in identifiable net assets and liabilities is higher than consideration at acquisition, the excess is recognized in the consolidated income statement in 'Profit from associates' line. Subsequent changes in the carrying value reflect the post-acquisition changes in the Group's share of net assets of the associate. The Group's share of its associates' profits or losses is recognised in the consolidated income statement, and its share of movements in reserves is recognised in other comprehensive income. However, when the Group's share of losses in an associate equal or exceeds its interest in the associate, the Group does not recognise further losses, unless the Group is obliged to make further payments to, or on behalf of, the associate.

3. Summary of significant accounting policies (continued)

Fair value measurement

The Group measures certain investment securities, derivate financial assets and liabilities, investment properties and certain other financial assets, at fair value at each balance sheet date. Also, fair values of financial instruments measured at amortised cost are disclosed in Note 28.

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

All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorised 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 recognised in the financial statements on a recurring basis, the Group determines whether transfers have occurred between levels in the hierarchy by re-assessing categorisation (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting period.

Financial assets and liabilities

Classification and measurement for financial assets and liabilities

The Group classifies all of its financial assets based on the business model for managing the assets and the asset's contractual terms, measured at either:

- fair value through profit or loss (FVPL);
- fair value through other comprehensive income (FVOCI) with recycling to income statement upon disposal for debt instruments;
- FVOCI without recycling to profit or loss for equity instruments; and
- amortised cost.

Financial liabilities, other than loan commitments and financial guarantees, are measured at amortised cost or at FVPL if they are held for trading.

Embedded derivatives are not separated from a host financial asset. Instead, financial assets are classified based on the business model and their contractual terms.
All derivative instruments are measured at FVPL.

Measurement of financial instruments at initial recognition

When financial instruments are recognised initially, they are measured at fair value, adjusted, in the case of instruments not at FVTPL, for directly attributable fees and costs.

The best evidence of the fair value of a financial instrument at initial recognition is normally the transaction price. If the Group determines that the fair value at initial recognition differs from the transaction price, then:

- if the fair value is evidenced by a quoted price in an active market for an identical asset or liability (i.e., a Level 1 input) or based on a valuation technique that uses only data from observable markets, the Group recognises the difference between the fair value at initial recognition and the transaction price as a gain or loss;
- in all other cases, the initial measurement of the financial instrument is adjusted to defer the difference between the fair value at initial recognition and the transaction price. After initial recognition, the Group recognises that deferred difference as a gain or loss only to the extent that it arises from a change in a factor (including time) that market participants would take into account when pricing the asset or liability.

3. Summary of significant accounting policies (continued)

Financial assets and liabilities (continued)

Subsequent measurement of financial instruments

Financial instruments measured at amortised cost

The Group measures amounts-due from credit institutions, loans to customers and other financial assets at amortised cost if both of the following conditions are met:

- The financial asset is held within a business model with the objective to hold financial assets in order to collect contractual cash flows.
- The contractual terms of the financial asset give rise on specified dates to cash flows that are solely payment of principal and interest (SPPI) on the principal amount outstanding.

The details of these conditions are outlined below.

Business model

The Group determines its business model at the level that best reflects how it manages groups of financial assets to achieve its business objective. The business model is not assessed on an instrument-by-instrument basis, but at a higher level of aggregated portfolios per instrument type and is based on the following observable factors:

- 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).
- How financial assets held within particular business model are evaluated and reported to key management personnel.

The expected frequency, value and timing of sales are also important aspects of the assessment. The business model assessment is based on reasonably expected scenarios without taking 'worst case' or 'stress case' scenarios into account. If cash flows after initial recognition are realised in a way that is different from the Group's original expectations, the Group does not change the classification of the remaining financial assets held in that business model, but incorporates such information when assessing newly originated or newly purchased financial assets going forward.

There are three business models available under IFRS 9:

- Hold to collect: it is intended to hold the asset to maturity to earn interest, collecting repayments of principal and interest form the counterparty.
- Hold to collect and sell: this model is similar to the hold to collect model, except that the entity may elect to sell some or all of the assets before maturity as circumstances change or to hold the assets for liquidity purposes.
- Other: all those models that do not meet the 'hold to collect' or 'hold to collect and sell' qualifying criteria.

Solely Payments of Principal and Interest (SPPI)

If a financial asset is held in either to a 'hold to collect', or a 'hold to collect and sell' business model, then the Group assesses whether contractual cash flows are SPPI on the principal amount outstanding at initial recognition to determine the classification. The SPPI test is performed on an individual instrument basis.

Contractual cash flows that represent SPPI on the principal amount outstanding are consistent with basic lending arrangements. Interest is consideration for the time value of money and the credit risk associated with the principal amount outstanding during a particular period of time. It can also include consideration for other basic lending risks (e.g. liquidity risk) and costs (e.g. administrative costs) associated with holding the financial asset for a particular period of time, and a profit margin that is consistent with a basic lending arrangement.

In assessing whether the contractual cash flows are SPPI, the Group considers whether the contractual terms of the financial asset contain a term that could change the timing or amount of contractual cash flows arising over the life of the instrument which could affect whether the instrument is considered to meet the SPPI test.

If the SPPI test is failed, such financial assets are measured at FVTPL with interest earned recognised in other interest income.

3. Summary of significant accounting policies (continued)

Financial assets and liabilities (continued)

Subsequent measurement of financial instruments (continued)

Financial instruments measured at amortised cost (continued)

Debt instruments at FVOCI

The Group measures debt investment securities at FVOCI when both of the following categories are met:

- The instrument is held within a business model, the objective of which is achieved by both collecting contractual cash flows, selling financial assets and holding such financial instruments for liquidity management purposes.
- The contractual terms of the financial asset meet the SPPI test.

FVOCI debt investment securities are subsequently measured at fair value with gains and losses arising due to changes in fair value recognised in OCI. Interest income and foreign exchange gains and losses are recognised in income statement in the same manner as for financial assets measured at amortised cost. On derecognition, cumulative gains or losses previously recognised in OCI are reclassified from OCI to profit or loss.

Factoring receivables

Factoring receivables, presented as part of Loans to Customers, factoring and finance lease receivables, are measured at amortised cost. They are initially measured at fair value plus incremental direct transaction costs, and subsequently at their amortised cost using the effective interest method.

Equity instruments at FVOCI – option

Upon initial recognition, the Group may elect to classify irrevocably its investment in equity instruments as equity instrument at FVOCI when they meet the definition of equity under IAS 32 *Financial Instruments: Presentation* and are not held for trading. Such classification is determined on an instrument-by-instrument basis.

The Group does not recycle gains and losses on these equity instruments to income statement nor does it make impairment assessment for these instruments. Dividends received are recognised in income statement.

Financial assets at FVTPL

Groups of financial assets for which the business model is other than 'hold to collect' and 'hold to collect and sell' are measured at FVTPL.

Derivatives recorded at FVTPL

The Group enters into derivative transactions with various counterparties. These include interest rate swaps, Forwards and other similar instruments. 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. Net changes in the fair value of derivatives are included in net other gains/(losses), excluding gain/loss on foreign exchange derivatives which are presented in net foreign currency gain. From the beginning of 2019, the Group enters into certain cross-currency swap agreements to match its funding costs in certain currencies with the income generated from lending activities in these currencies. As a result, the Group economically hedges the interest rate risk, however no hedge accounting under IFRS 9 is applied. Net changes in the fair value of such derivative financial instruments, which are presented in net foreign currency gain, excludes unwinding of the locked-in interest differential which is presented as part of interest expense to reflect risk management objective of the Group.

Financial guarantees, letter of credits and other financial commitments

The Group enters into the financial guarantee contracts whereby it's required to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make payment when due. Financial guarantees, letter of credits and other financial commitments are initially recognised in the financial statements at fair value, being the premium received. Subsequent to initial recognition, the Group's liability under each guarantee is measured at the higher of the amount initially recognised, less cumulative amortisation recognised in the consolidated income statement and an expected credit loss (ECL) provision.

Non-financial guarantees

The Group enters into non-financial guarantee contracts whereby it's required to compensate to the holder in case another party fails to meet its contractual obligations. Non-financial guarantees are initially recognised in the financial statements at fair value, being the premium received, amortized on a straight-line basis over the life of the contract. Subsequent to initial recognition the Group's liability under non-financial guarantee is measured at expected credit loss (ECL) provision that takes into account the probability of another party defaulting on its obligations as well as available collateral under the guarantee contracts and is recognised in the consolidated income statement as part of other expected credit loss.

3. Summary of significant accounting policies (continued)

Financial assets and liabilities (continued)

Subsequent measurement of financial instruments (continued)

Cash and cash equivalents

Cash and cash equivalents consist of cash on hand, amounts due from central banks, excluding obligatory reserves with central banks, and amounts due from credit institutions that mature within 90 days of the date of origination, and are free from contractual encumbrances and readily convertible to known amounts of cash. The Group also holds cash in nominal ownership on behalf of its clients. The Group does not control this cash nor does it have the potential to produce economic benefits to the Group, therefore asset recognition criteria is not met in such cases. Respectively, the Group does not recognise these amounts in its consolidated statement of financial position.

Borrowings

The Group classifies issued financial instruments or their components as liabilities, where the substance of the contractual arrangement results in the Group 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 credit institutions and amounts due to customers (including promissory notes issued). The Group initially recognises these liabilities at the fair value of the consideration received less directly attributable transaction costs. After initial recognition, borrowings are subsequently measured at amortised cost, using the effective interest rate (EIR) method. Gains and losses are recognised in the consolidated income statement when the borrowings are derecognised as well as through the amortisation process.

Issued Additional Tier 1 instruments with perpetual maturity and discretionary interest payments are classified as financial liabilities when the instruments are not convertible into equity and the Group does not have an unconditional right to avoid delivering cash upon a predetermined trigger event that is beyond the control of both the issuer and the holder of the instrument. Such instruments are measured at amortised cost with respective interest presented as part of interest expense in the consolidated income statement.

If the Group purchases its own debt, it is removed from the Statement of Financial Position and the difference between the carrying amount of the liability and the consideration paid is recognised in the Consolidated Income Statement.

Subordinated debt

Subordinated debt represents long-term funds attracted by the Bank on the international financial markets or domestic market. The holders of subordinated debt would be subordinate to all other creditors to receive repayment of debt in case of the Bank's liquidation. Subordinated debt is carried at amortised cost.

Securities lending and sale-and-repurchase transactions

Securities sold under sale and repurchase (repo) agreements are accounted for as secured financing transactions, with the securities retained in the statement of financial position and the counterparty liability included in amounts payable under repo transactions. The difference between the sale and repurchase prices represents interest expense and is recognised in income statement over the term of the repo agreement using the effective interest method. If the counterparty has the right to sell or pledge securities subject to the agreement, the Group reclassifies them on its statement of financial position as Investment securities pledged under sale and repurchase agreements and securities lending.

Securities purchased under agreements to resell (reverse repo) are recorded as amounts receivable under reverse repo transactions. The difference between the purchase and resale prices represents interest income and is recognised in income statement over the term of the repo agreement using the effective interest method.

If assets purchased under an agreement to resell are sold to third parties, the obligation to return securities is recorded as a trading liability and measured at fair value.

Leases

The Group as a lessee

The Group's main leasing activities include the leases of service centres, ATM spaces and warehouses. A non-cancellable lease period is up to twenty years. Lease payments are fixed in most cases. The contacts don't generally carry extension or termination options for the lease term and do not impose any covenants.

Recognition of right-of-use asset and lease liability

The Group recognizes a right-of-use asset at the lease commencement date at an initial amount of the lease liability adjusted for lease payments made at or before the commencement date. The right-of-use asset is subsequently depreciated using the straight-line method over the lease term.

The lease liability is initially measured at the present value of the future lease payments excluding payments for VAT, discounted using the Group's incremental borrowing rate (IBR). The lease liability is subsequently measured at amortised cost using the IBR.

3. Summary of significant accounting policies (continued)

Leases (continued)

The Group as a lessee (continued)

Recognition exemptions

The Group applies the recognition exemptions on lease contracts for which the lease term ends within 12 months as of the date of initial application, and lease contracts for which the underlying asset is of low value. The Group recognises the lease payments associated with these leases as an occupancy and rent expense on a straight-line basis over the lease term and present them as part of general and administrative expenses.

Modifications of lease contracts

If the lease contract is modified by either changing the scope of the lease, or the consideration for a lease that was not part of the original terms and conditions of the lease, the Group determines whether the modification results in:

- a separate lease; or
- a change in the accounting for the existing lease.

For the lease modifications that are not accounted as separate leases, the Group re-measures the lease liability either by recognising gain or loss relating to the partial or full termination of the lease or through adjusting respective right-of-use asset.

The Group as a lessor

At the inception of the lease, the Group classifies each of its leases as either an operating lease or a finance lease.

Finance lease

The Group classifies leases that transfer substantially all the risks and benefits incidental to ownership of the lease item to the lessee as finance leases. All other leases are classified as operating leases. The Group recognises finance lease receivables in the Consolidated Statement of Financial Position at a value equal to the net investment in the lease, starting from the date of commencement of the lease term. In calculating the present value of the minimum lease payments, the Group uses the interest rate implicit in the lease as a discount factor. Initial direct costs are included in the initial measurement of the finance lease receivables. Lease payments received are apportioned between the finance income and the reduction of the outstanding lease receivable. Finance income is based on a pattern reflecting a constant periodic rate of return on the net investment outstanding.

Operating lease

The Group presents assets subject to operating leases in the Consolidated Statement of Financial Position according to the nature of the asset. Lease income from operating leases is recognised in the Consolidated Income Statement on a straight-line basis over the lease term as Net other gains/(losses).

Impairment of financial assets

Overview of the ECL principles

The Group records an allowance for (ECL) for all loans and other debt financial assets not held at FVPL, together with loan commitments and financial guarantee contracts, in this section all referred to as 'financial assets'.

The allowance is based on the ECL associated with a probability of default (PD) in the next 12 months unless there has been a significant increase in credit risk since origination, in which case the allowance is based on the ECL over the life of the asset (lifetime ECL). If the financial asset meets the definition of purchased or originated credit-impaired (POCI), the allowance is based on the change in the lifetime ECL.

The Group applies the simplified approach for trade and other receivables and contract assets and records lifetime ECLs on them.

3. Summary of significant accounting policies (continued)

Staged approach to the determination of ECLs

The Group has established a policy to perform an assessment, at the end of each reporting period, of whether a financial asset's credit risk has increased significantly since initial recognition, by considering the change in the risk of default occurring over the remaining life of the financial instrument. Based on the above process, the Group groups its financial instruments into Stage 1, Stage 2, Stage 3 and POCI, as described below:

- Stage 1: The Group recognises a credit loss allowance at an amount equal to 12-month ECL. This represents the portion of lifetime ECL from default events that are expected within 12 months of the reporting date, assuming that credit risk has not increased significantly after initial recognition. For those financial assets with a remaining maturity of less than 12 months, a PD is used that corresponds to the remaining maturity.
- Stage 2: The Group recognises a credit loss allowance at an amount equal to lifetime expected credit losses (LTECL) for those financial instruments which are considered to have experienced a significant increase in credit risk since initial recognition. This requires the computation of ECL based on lifetime probability of default (LTPD) that represents the PD occurring over the remaining lifetime of the financial instrument. Allowance for credit losses are higher in this stage because of an increase in credit risk and the impact of a longer time horizon being considered compared with 12 months in Stage 1. Financial Instruments in stage 2 are not yet deemed to be credit-impaired.
- Stage 3: If the financial instrument is credit-impaired, it is then moved to Stage 3. The Group recognises a loss allowance at an amount equal to lifetime ECL, reflecting a PD of 100% for those financial instruments that are credit-impaired.

Unless POCI, newly originated assets are classified as Stage 1 and remain in that stage unless there is considered to have been a significant increase in credit risk since initial recognition, at which point the asset is reclassified to Stage 2.

POCI assets are financial instruments that are credit-impaired on initial recognition. POCI assets are recorded at fair value at original recognition and interest income is subsequently recognised based on a credit adjusted EIR (CAEIR). CAEIR takes into account all contractual terms of the financial asset and ECLs. ECLs are only recognised or released to the extent that there is a subsequent change in the ECLs where ECLs are calculated based on lifetime ECL. Once the financial asset is recognised as POCI, it retains this status until derecognised.

Key judgements and estimates used in ECL calculation are disclosed in Note 4.

Derecognition of financial assets and liabilities

Derecognition of financial assets

The Group derecognises a financial asset (or, where applicable, a part of a financial asset or part of a group of similar financial assets) where:

- the rights to receive cash flows from the asset have expired; or
- the Group 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 Group 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.

Derecognition and modification of financial assets

The Group sometimes renegotiates or otherwise modifies the contractual cash flows of financial assets. When this happens, the Group assesses whether or not the new terms are substantially different to the original terms, based on qualitative and quantitative criteria. The Group derecognises a financial asset, such as a loan to a customer, when the terms and conditions have been renegotiated to the extent that, substantially, it becomes a new loan, except in cases when renegotiation of contractual terms happens due to financial difficulties of the borrower. Once the financial asset is derecognised, the difference is recognised as a derecognition gain or loss, to the extent that an impairment loss has not already been recorded. The newly recognised loans are classified as Stage 1 for ECL measurement purposes, unless the new loan is deemed to be POCI.

3. Summary of significant accounting policies (continued)

Derecognition of financial assets and liabilities (continued)

Derecognition and modification of financial assets (continued)

The Group applies derecognition of the financial asset if any of the following criteria are met:

- Change in currency of the loan.
- Change in interest rate type.
- Introduction of an equity feature.
- Change in counterparty.

If the terms are not substantially different, or the renegotiation is due to the financial difficulties of the borrower, such renegotiation or modification does not result in derecognition, and the Group recalculates the gross carrying amount based on the revised cash flows of the financial asset and recognises a modification gain or loss in interest income. The new gross carrying amount is calculated by discounting the modified cash flows at the original EIR.

Forbearance and modified loans

The Group sometimes makes concessions or modifications to the original terms of the loans as a response to the borrower's financial difficulties, rather than taking possession or otherwise enforcing collection of collateral. The Group 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 Group would not have agreed to them if the borrower had been financially healthy. 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. Once the asset has been identified as forborne, the assets are classified in Stage 3. The decision as to how long the asset remains in the forborne category is determined on a case-by-case basis for commercial and SME loans, when a minimum six consecutive payments are required for the rest of the loans to exit from the forbearance category and transfer to Stage 2. Once the loan is transferred to Stage 2, the Group continues to re-assess whether there has been a significant increase in credit risk, however, such assets remain in Stage 2 for a minimum 12-month probation period before being transferred to Stage 1.

Derecognition of financial liabilities

The Group derecognises a financial liability when the obligation under the liability is discharged, 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 Consolidated Income Statement.

Foreclosed Assets

All repossessed land and buildings were previously classified as Investment Properties at initial recognition given these assets were managed with a view of capital appreciation or earning a rental income. Commencing from 2022, the Group updated its property management strategy and decided to move majority of the realizations of such properties at a quicker pace. Respectively, all repossessed collaterals, including land and buildings, are now classified either as Investment Properties or Foreclosed Assets depending the Group's intention in respect of recovery of these assets.

Foreclosed assets are valued at the lower of cost and net realisable value. For some of the assets the Group has granted to a previous owner a repurchase option with average period of 1-1.5 years. The Group is precluded from selling the repossessed asset during the option period. The Group does not recognize the options separately in the consolidated financial statements but considers the exercise price in measurement of NRV where relevant.

Majority of the Group's foreclosed assets consists of the real estate assets repossessed during recovery of defaulted loans. Such assets are specific and not ordinarily interchangeable, respectively the Group applies specific identification of their individual costs. Realisation gain/loss from above assets are included under Net other gains/(losses) in the Group's consolidated income statement.

3. Summary of significant accounting policies (continued)

Non-current assets held for sale

The Group classifies non-current assets and disposal groups as held for sale if their carrying amounts will be recovered principally through a sale transaction rather than through continuing use. Non-current assets and disposal groups classified as held for sale are measured at the lower of their carrying amount and fair value less costs to sell.

Assets and liabilities classified as held for sale are presented separately from other assets and liabilities in the statement of financial position.

Taxation

The Group calculates the current income tax expense in accordance with the regulations in force in the respective territories in which the Group and its subsidiaries operate.

Deferred tax assets and liabilities are calculated in respect of temporary differences arising between the tax bases of assets and liabilities and their carrying values for financial reporting purposes.

The Group recognises a deferred tax asset 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.

Deferred tax liabilities are provided on temporary differences arising on investments in subsidiaries, associates and joint ventures, except where the timing of the reversal of the temporary difference can be controlled and it is probable that the temporary difference will not reverse in the foreseeable future.

Georgia and Belarus also have various operating taxes that are assessed on the Group's activities. These taxes are included as a component of other operating expenses.

Uncertain tax positions

The Group reassesses uncertain tax positions at the end of each reporting period. The assessment is based on the interpretation of the tax laws that have been enacted or substantively enacted by the end of reporting period and any known court or other rulings on such issues. Liabilities are recorded for income tax positions that are determined as more likely than not to result in additional tax levied if the positions were to be challenged by the tax authorities. Liabilities for penalties, interest and taxes other than on income are recognised based on the best estimate of the expenditure required to settle the obligations at the end of the reporting period.

Investment properties

The Group recognises investment property initially at cost, including transaction costs, and subsequently re-measured at fair value reflecting market conditions at the end of the reporting period. Fair value of the Group's investment property is determined on the basis of various sources including reports of independent appraisers, who hold a recognised and relevant professional qualification and who have recent experience in valuation of property of similar location and category.

Gains and losses resulting from changes in the fair value of investment property as well as earned rental income are recorded in the income statement within net other gains/(losses).

3. Summary of significant accounting policies (continued)

Property and equipment

The Group records property and equipment at cost less accumulated depreciation and any accumulated impairment in value.

Depreciation of an asset commences from the date the asset is ready and available for use. Depreciation is calculated on a straight-line basis over the following estimated useful lives:

	Years
Office buildings and service centres	Up to 100
Furniture and fixtures	3-20
Computers and equipment	5-10
Motor vehides	2-7

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

Assets under construction are stated at cost and are not depreciated until the time they are available for use and reclassified to their respective group of property and equipment.

Leasehold improvements are depreciated over the shorter life of the related leased asset and the expected lease term.

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

Goodwill impairment

Goodwill is reviewed for impairment, annually or more frequently if events or changes in circumstances indicate that the carrying amount may be impaired.

For the purpose of impairment testing goodwill, acquired in a business combination is, from the acquisition date, allocated to each of the Group's cash-generating units, or groups of cash-generating units, that are expected to benefit from the synergies of the combination, irrespective of whether other assets or liabilities of the Group are assigned to those units or groups of units. Each unit or group of units to which the goodwill is so allocated:

- represents the lowest level within the Group at which the goodwill is monitored for internal management purposes; and
- is not larger than a segment as defined in IFRS 8 Operating Segments.

Impairment is determined by assessing the recoverable amount of the cash-generating unit (or group of cash-generating units), to which the goodwill relates. Where the recoverable amount of the cash-generating unit (or group of cash-generating units) is less than the carrying amount, an impairment loss is recognised. Impairment losses cannot be reversed in future periods.

Intangible assets

The Group's intangible assets include computer software, licences, internally generated assets.

Intangible assets acquired separately are initially measured at cost and subsequently carried at cost less any accumulated amortisation and any accumulated impairment losses. The economic lives of intangible assets are assessed to be finite and amortised over four to 15 years and assessed for impairment whenever there is an indication that the intangible asset may be impaired. Amortisation periods and methods for intangible assets are reviewed at least at each financial year-end.

Costs associated with maintaining computer software programmes are recorded as an expense as incurred. Software development costs (relating to the design and testing of new or substantially improved software) are recognised as intangible assets.

3. Summary of significant accounting policies (continued)

Provisions

The Group recognises a provision when 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.

Share-based payment transactions

Employees (including senior executives) of the Group receive share-based remuneration, whereby they render services and receive equity instruments of Lion Finance Group PLC ('equity-settled transactions') as consideration for the services provided.

Equity-settled transactions

The cost of equity-settled transactions with employees is measured by reference to the fair value at the date on which they are granted. The awards of shares in monetary terms are measured by reference to the monetary value (as awarded) adjusted for the time value of money where necessary.
The cost of equity-settled transactions is recognised together with the corresponding increase in equity as part of additional paid-in capital, over the period in which the performance and/or service conditions are fulfilled, ending on the date when the relevant employee is fully entitled to the award ('the vesting date'). The subsequent holding period does not imply any employment service provision from the share recipient side, therefore it does not affect the expense recognition period. The consolidated Income Statement charge or credit for the period represents the movement in cumulative expense recognised as at the beginning and end of that period.

Where the terms of an equity-settled award are modified, the Group recognises the minimum expense as if the terms had not been modified. An additional expense is recognised for any modification that increases the total fair value of the share-based payment arrangement, or is otherwise beneficial to the employee as measured at the date of the modification.

Where a new equity-settled award is designated as a replacement of a cancelled equity-settled award, the replacement of equity instruments are accounted for as a modification.

Where the Group cancels an equity-settled award, it is treated as if it has vested on the date of cancellation, and any expense not yet recognised for the award is recognised immediately. However, if a new award is substituted for the cancelled award, and designated as the replacement award on the date that it is granted, the cancelled and the new awards are treated as if they were a modification of the original award, as described in the previous paragraph.

Equity

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.

Additional paid-in capital

Any excess of the fair value of consideration received over the par value of shares issued is recognised as additional paid-in capital. Further, the effects of share-based payments are also recognised as part of the additional paid-in capital.

Treasury shares

Where the Group purchase its own shares, the consideration paid, including any attributable transaction costs, net of income taxes, is deducted from total equity as treasury shares until they are cancelled or reissued. Where such shares are subsequently sold or reissued, any consideration received is included in equity. Treasury shares are stated at par value, with adjustment of premiums against additional paid-in capital.

Dividends

The Group recognises dividends as liabilities and deducts them from equity at the reporting date only if they are declared before or on the reporting date and do not require further approval. Dividends are disclosed when they are proposed before the reporting date or proposed or declared after the reporting date but before the Consolidated Financial Statements are authorised for issue. All expenses associated with dividend distribution are added to dividend amount and recorded directly through equity.

3. Summary of significant accounting Policies (continued)

Contingencies

Contingent liabilities are not recognised in the Consolidated 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 Consolidated Statement of Financial Position but disclosed when an inflow of economic benefits is probable.

Income and expense recognition

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

Interest and similar income and expense

For all financial instruments measured at amortised cost and interest-bearing securities, interest income or expense is recorded at the EIR.

For financial instruments in Stage 1 and Stage 2, the Group calculates interest income by applying the effective interest rate (EIR) to the gross carrying amount. Interest income for financial assets in Stage 3 is calculated by applying the EIR to the amortised cost (i.e. the gross carrying amount less credit loss allowance). For financial instruments classified as POCI only, interest income is calculated by applying a credit adjusted EIR to the amortised cost of these POCI assets. The Group presents interest revenue calculated using the EIR method separately in the income statement.

Fee and commission income

The Group earns fee and commission income from a diverse range of services it provides to its customers. Fee and commission income are recognised when the Group satisfies a performance obligation. Fee income can be divided into the following categories:

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

The Group recognises fees income for the provision of services over a period of time over that period. These fees include commission incomes and asset management, custody, package services on bundled products 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 EIR on the loan.

Customer loyalty program

Customer loyalty program points accumulated in the business are treated as deferred revenue and recognised in revenues gradually as they are earned. The Group recognizes gross revenue earned from customer loyalty program when the performance obligation is satisfied i.e. when the customer redeems the points or the points expire, where the Group acts as a principal. Conversely, the Group measures its revenue as the net amount retained on its account representing the difference between the consideration allocated to the award credits and the amount payable to the third party for supplying the awards as soon as the award credits are granted, where the Group acts as an agent.

Performance obligations satisfied at a point in time

Fees and commissions earned from providing transaction-type services such as settlement, brokerage, cash and currency conversion operations are recognised when the service has been completed, provided such fees and commissions are not subject to refund or another contingency beyond the control of the Group. Fees from currency conversion operations represent additional commission (other than currency dealing revenue recognised in net foreign currency gain) charged on currency conversion service provided to customers on cards used abroad.

Dividend income

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

Non-recurring items

The Group separately classifies and discloses those income and expenses that are non-recurring by nature. The Group defines non-recurring income or expense as an income or expense triggered by, or originated from, an economic, business or financial event that is not inherent to the regular and ordinary business course of the Group and is caused by uncertain or unpredictable external factors that cannot be reasonably expected to occur in the future, and thus should not be taken into account when making projections of future results.

3. Summary of significant accounting policies (continued)

Functional, reporting currencies and foreign currency translation

The Consolidated Financial Statements are presented in Georgian Lari, which is the Group's presentation currency. The Bank's functional currency is Georgian Lari. Each entity in the Group determines its own functional currency and items included in the financial statements of each entity are measured using that functional 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 into functional currency 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 Consolidated Income Statement 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. When a gain or loss on a non-monetary item is recognised in other comprehensive income, any exchange component of that gain or loss is recognised in other comprehensive income. Conversely, when a gain or loss on a non-monetary item is recognised in profit or loss, any exchange component of that gain or loss is recognised in the income statement.

Differences between the contractual exchange rate of a certain transaction and the NBG exchange rate on the date of the transaction are included in net foreign currency gain. The official NBG exchange rates at 31 December 2024, 31 December 2023 and 31 December 2022 were:

	Lari to GBP	*Lari to USD*	*Lari to EUR*	*Lari to BYN*
31 December 2024	3.5349	2.8068	2.9306	0.8594
31 December 2023	3.4228	2.6894	2.9753	0.8162
31 December 2022	3.2581	2.7020	2.8844	1.0730

As at the reporting date, the assets and liabilities of the entities whose functional currency is different from the presentation currency of the Group are translated into Georgian Lari at the rate of exchange ruling at the reporting date and their income statements are translated at the average exchange rates for the year. The exchange differences arising on the translation are taken to other comprehensive income.

Any goodwill arising on the acquisition of a foreign operation and any fair value adjustments to the carrying amounts of assets and liabilities arising on the acquisition are treated as assets and liabilities of the foreign operations, and translated at the rate at the reporting date.

Adoption of new or revised standards and interpretations

Amendments effective from 1 January 2024

Amendments to IAS 1 - Classification of Liabilities as Current or Non-current and *Non-current Liabilities with Covenants*

The amendments to IAS 1 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.

In addition, an entity is required to disclose when a liability arising from a loan agreement is classified as non-current and the entity's right to defer settlement is contingent on compliance with future covenants within twelve months.
The amendments had no material impact on the Group's consolidated financial statements.

Amendments to IAS 7 and IFRS 7 - Supplier Finance Arrangements

The amendments clarify the characteristics of supplier finance arrangements and require additional disclosure of such arrangements. The disclosure requirements in the amendments are intended to assist users of financial statements in understanding the effects of supplier finance arrangements on an entity's liabilities, cash flows and exposure to liquidity risk. The amendment had no material impact on the Group's consolidated financial statements.

3. Summary of significant accounting policies (continued)

Adoption of new or revised standards and interpretations (continued)

Amendments to IFRS 16: Lease Liability in a Sale and Leaseback

The amendments in IFRS 16 specify the requirements that a seller-lessee uses in measuring the lease liability arising in a sale and leaseback transaction, to ensure the seller-lessee does not recognize any amount of the gain or loss that relates to the right of use it retains.
The amendment had no material impact on the Group's consolidated financial statements.

Standards issued but not yet effective

The new and amended standards and interpretations that are issued, but not yet effective, up to the date of issuance of the Group's consolidated financial statements are disclosed below. The Group intends to adopt these new and amended standards and interpretations, if applicable, when they become effective.

Classification and Measurement of Financial Instruments – Amendments to IFRS 9 and IFRS 7

In May 2024, the IAS issued Amendments to the Classification and Measurement of Financial Instruments which amended IFRS 9 and IFRS 7. The amendments:

- Clarify that a financial liability is derecognized on the 'settlement date', i.e. when the related obligation is discharged or cancelled or expires or the liability otherwise qualifies for derecognition. They also introduce an accounting policy option to derecognize financial liabilities that are settled through an electronic payment system before settlement date if certain conditions are met;
- Clarify how to assess the contractual cash flow characteristics of financial assets that include environmental, social and governance (ESG)-linked features and other similar contingent features;
- Clarify the treatment of non-recourse assets and contractually linked instruments (CLI);
- Require additional disclosures in IFRS 7 for financial assets and liabilities with contractual terms that reference a contingent event (including those that are ESG-linked), and equity instruments classified at fair value through other comprehensive income (FVTOCI).

The requirements will be effective for annual reporting periods beginning on or after 1 January 2026, with early adoption permitted.

The Group is in the process of assessing the impact of the new amendments.

IFRS 18 Presentation and Disclosure in Financial Statements

In April 2024, the IASB issued IFRS 18, which replaces IAS 1 Presentation of Financial Statements. IFRS 18 introduces new requirements for presentation within the statement of profit or loss, including specified totals and subtotals. Furthermore, entities are required to classify all income and expenses within the statement of profit or loss into one of five categories: operating, investing, financing, income taxes and discontinued operations, whereof the first three are new.

It also requires disclosure of newly defined management-defined performance measures, subtotals of income and expenses, and includes new requirements for aggregation and disaggregation of financial information based on the identified 'roles' of the primary financial statements (PFS) and the notes.

In addition, narrow-scope amendments have been made to IAS 7 Statement of Cash Flows, which include changing the starting point for determining cash flows from operations under the indirect method, from 'profit or loss' to 'operating profit or loss' and removing the optionality around classification of cash flows from dividends and interest. In addition, there are consequential amendments to several other standards.

IFRS 18, and the amendments to the other standards, is effective for reporting periods beginning on or after 1 January 2027, but earlier application is permitted and must be disclosed. IFRS 18 will apply retrospectively.

The Group is currently working to identify all impacts the amendments will have on the primary financial statements and notes to the financial statements.

Lack of Exchangeability - Amendments to IAS 21

IASB has published "Lack of Exchangeability" (Amendments to IAS 21) that contains guidance to specify when a currency is exchangeable and how to determine the exchange rate when it is not. The amendments are applicable for annual reporting periods beginning on or after 1 January 2025. Earlier application is permitted.

The amendments are not expected to have a material impact on the Group's financial statements.

4. Significant accounting judgements and estimates

Estimates involved in measurement of investment properties, assets held for sale and foreclosed assets

Fair values of investment properties, assets held for sale and net realizable values of foreclosed assets is determined by independent, professionally qualified appraisers. Fair value is determined using a combination of the internal capitalisation method (also known as the discounted future cash flow method) and the sales comparison method.

The Group performs valuation of its investment properties, assets held for sale and foreclosed assets with a sufficient regularity to ensure that the carrying amount does not differ materially from that which would be determined using fair value and respective measurement principles at the end of the reporting period.

Considering the upward real estate market trend, the Group updated the valuation of its investment properties in 2024. The results of this valuation are presented in Note 11, while valuation inputs and techniques are presented in Note 28. The Group's properties are spread across the different parts of the country. While the secondary market in Georgia provides adequate market information for fair value measurements for small and medium sized properties, the valuation of large properties involves application of various observable and unobservable inputs to determine adjustments to the available comparable sale prices. These estimates and assumptions are based on the best available information; however, actual results could be different.

Acquisition of an investment in associate

On 31 March 2024, with reference to Share Purchase Agreement (SPA) dated 18 February 2024, JSC Bank of Georgia acquired 30% of the share capital of Ameriabank CJSC, one of the leading banks operating in Armenia. Consideration transferred for the investment was GEL 248,859 which was fully settled by the end of 2024. The fair value of the net assets acquired attributable to the Bank was GEL 454,624. The acquisition-related costs capitalized to cost of investments in 2024 was GEL 946. The Group accounts investment in Ameriabank CJSC as an investment in associate under IAS 28 applying equity method.

During the year ended 31 December 2024, the Group recognized a gain of GEL 205,765 from a bargain purchase related to acquisition its 30% investment in Ameriabank CJSC, being the difference between consideration payable and the Group's share in the net assets acquired.

For the year ended 31 December 2024, the results from the associate recognized in profit or loss and other comprehensive income comprises:

Share of post-acquisition profit or loss of associates	GEL 85,958
Bargain purchase gain at acquisition of associate	GEL 205,765
Total profit from associate	**GEL 291,723**
Share of OCI of associate	GEL 17,526
Total comprehensive income from associate	**GEL 309,249**

The carrying value of investment in Ameriabank CJSC as at 31 December 2024 amounted to GEL 559,054.

Below table provides summarised financial information of Ameriabank and a reconciliation to the carrying amount of the investment in associate:

	Ameriabank's Statement of Financial Position
Cash and cash equivalents	1,409,223
Amounts due from credit institutions	821,780
Investment Securities	1,447,557
Loans to customers, factoring and finance lease receivables	9,265,003
Property and equipment	74,671
Intangibles	121,175
Right-of-use assets	89,178
Other Assets	142,121
Total Assets	**13,370,708**
Client deposits and notes	7,949,083
Amounts owed to credit institutions	1,956,445
Debt securities issued	1,155,679
Other liabilities	449,140
Total Liabilities	**11,510,347**
Net Assets of Ameriabank:	**1,860,361**
Group's share of net assets:	**558,108**
Acquisition-related costs capitalized to cost of investment	946
Carrying amount of investment in Ameriabank	559,054

4. Significant accounting judgements and estimates (continued)

Acquisition of an investment in associate (continued)

	Ameriabank's Statement of Comprehensive Income
Interest Income	794,616
Interest Expense	(278,991)
Fee Income	133,108
Fee Expense	(43,185)
Depreciation, amortization and impairment	(40,818)
Income tax expense	(73,073)
Profit or loss	286,528
Group's share of Profit or loss	**85,958**
Other comprehensive income	58,419
Group's share of other comprehensive income:	**17,526**
Total comprehensive income	344,947
Group's share of Total comprehensive income:	**103,484**

Allowance for financial assets

IFRS 9 requires management to make a number of judgements, assumptions and estimates based on management's knowledge and historical experience that affect the allowance for ECL. A summary of the key judgements made by management is set out below.

Definition of default, credit-impaired and cure (Note 27)

The Group's definition of default is based on quantitative and qualitative criteria. The definition may differ across products. The definition is consistent with the definition used for internal credit risk management purposes and it corresponds with internal financial instrument risk classification rules. A counterparty is classified as defaulted at the latest when payments of interest, principal or fees are overdue for more than 90 days or when bankruptcy, fraud, insolvency proceedings of enforced liquidation have commenced, or there is other evidence that the payment obligations will not be fully met. The determination of whether a financial instrument is credit-impaired focuses on default risk, without taking into consideration the effects of credit risk mitigations such as collateral or guarantees.
An instrument is classified as credit-impaired if the counterparty has defaulted and/or the instrument is POCI.

Once the financial asset is classified as credit-impaired (except for POCIs) it remains as such unless all past due amounts have been rectified or there is general evidence of credit recovery.
A minimum period of six consecutive months' payment is applied as exit criteria to financial assets restructured due to credit risk other than corporate loan portfolio and debt instruments measured at FVOCI, where exit criteria are determined as exit from bankruptcy or insolvency status, disappearance of liquidity problems or existence of other general evidence of credit recovery assessed on individual basis.

For other credit-impaired financial instruments, exit criteria are determined as repayment of the entire overdue amount other than through refinancing or foreclosure.

Once a credit-impaired financial asset meets default exit criteria, it remains in Stage 2 at least for the next 12 consecutive months. In case no default status is assigned during the 12 consecutive months, it is transferred to Stage 1 if its credit risk is not significantly higher than at origination date.

4. Significant accounting judgements and estimates (continued)

Significant increase in credit risk (SICR)

SICR is not a defined term per IFRS 9, and is determined by management, based on their experience and judgement. In assessing whether the credit risk has significantly increased, the Group has identified a series of qualitative and quantitative criteria based on undertaking the holistic analysis of various factors including those which are specific to a particular financial instrument or to a borrower as well as those applicable to particular sub-portfolios. These criteria are:

- A significant increase in credit risk, expressed in the relative and/or absolute increase in the risk of default since initial recognition. SICR is determined based on comparison between credit risk ratings (internal or external) as of the origination date and credit risk ratings as of the reporting date for each financial asset individually. Thresholds are determined separately for corporate, retail and SME and other financial instrument portfolios, depending on initial grade assigned at origination. The threshold applied depends on the original credit quality of the borrowers. Higher threshold is set for those instruments with a low PD at origination.

The table below summarises SICR thresholds (the actual thresholds are applied on a more granular level):

Loan Portfolio Type	Rating type	Initial rating	SICR threshold (notches)
Commercial loans	Internal	2-4+	5-12
Commercial loans	Internal	5-7+	1-5
Micro and SME loans	External	A-C	5-8
Mortgage loans	External	A-C	6-8
Consumer loans	External	A-C	4-10
Gold – pawn loans	External	A-C	6-10
Micro and SME loans, Mortgage, Consumer, Gold – pawn loans	External	D-E	1-5

- Existence of forecast of adverse changes in commercial, financial or economic conditions that adversely affect the creditworthiness of the borrower.
- Modification of the contractual terms due to financial problems of the borrower other than default
- The days past due on the counterparty level breached the threshold of 30 days.
- Other qualitative indicators, such as external market indicators of credit risk or general economic conditions, which indicate that the level of risk has been increased significantly since origination.

The above noted SICR indicators are identified at financial instrument level in order to track changes in credit risk since initial recognition date.

Measurement of ECLs
ECL reflects an unbiased, probability-weighted estimate based on a combination of the following principal factors: PD, loss given default (LGD), and exposure at default (EAD), which are further explained below:
PD estimation: The Group estimates PD based on a combination of rating model calibration results and a migration matrices approach which is further adjusted for macroeconomic expectations for a minimum three years onwards for all portfolios, to represent the forward-looking estimators of the PD parameters. The migration matrix is built in a way to reflect the weighted average yearly migration over the historical data period. The risk groups are determined in a way to ensure intra-group homogeneity and differentiation of expected PD levels. For loan portfolios other than corporate loans, PD is further adjusted considering time since financial instrument origination. The models incorporate both qualitative and quantitative information and, where practical, build on information from top rating agencies, Credit Bureau or internal credit rating systems. Since Stage 3 financial instruments are defaulted, the PD in this case is equal to 100%.

EAD: The EAD represents an estimate of the exposure to credit risk at the time of a potential default occurring during the life of a financial asset. It represents the cash flows outstanding at the time of default, considering expected repayments, interest payments and accruals discounted at the EIR. To calculate EAD for a Stage 1 financial instrument, the Group assesses the possible default events within 12 months for the calculation of the 12 months ECL. For Stage 2 and POCI financial instruments, the EAD is considered for events over the lifetime of the instruments. The Group determines EAD differently for products with repayment schedules and those without repayment schedules. For financial instruments with repayment schedules, the Group estimates forward-looking EAD using the contractual cash flow approach with further corrections for expected prepayments and overdue days. For products without the repayment schedules such as credit cards, credit lines and financial guarantees, the Group estimates the forward-looking EAD using the limit utilisation approach. Under the above approach EAD is calculated using the expected utilization rate based on historical data of actual draw-down amounts.

4. Significant accounting judgements and estimates (continued)

Measurement of ECLs (continued)

LGD: LGD is defined as the likely loss in case of a counterparty default. It provides an estimation of the exposure that cannot be recovered in a default event and therefore captures the severity of a loss. The determination of the LGD takes into account expected future cash flows from collateral and other credit enhancements, or expected payouts from bankruptcy proceedings for unsecured claims and where applicable time to realisation of collateral and the seniority of claims. The Group segments its financial instruments into homogeneous portfolios, based on key characteristics that are relevant to the estimation of future cash flows. The applied data is based on historically collected loss data and involves a wider set of transaction characteristics (e.g. product type, wider range of collateral types). Based on this information, the Group estimates the recovery rate (other than through collateral), cure rate and probability of re-default. Recovery through collateral is further considered in LGD calculations individually for each financial instrument.

Assets considered in the ECL calculations

IFRS 9 requires cash flows expected from collateral and other credit enhancements to be reflected in the ECL calculation. The treatment and reflection of collateral for IFRS 9 purposes is in line with general risk management principles, policies and processes of the Group. Collateral, unless repossessed, is not recorded on the Group's statement of financial position. The fair value of collateral affects the calculation of ECLs. It is generally assessed at inception and reassessed on an annual basis for all material exposures.

Forward-looking information

Under IFRS 9, the allowance for expected credit losses is based on reasonable and supportable forward-looking information obtainable without undue cost or effort, which takes into consideration past events, current conditions and forecasts of future economic conditions.

To incorporate forward-looking information into the Group's allowance for expected credit losses, the Group uses the macroeconomic forecasts provided by the NBG for Group companies operating in Georgia, while data used by Belarusky Narodny Bank ("BNB") is provided by a non-governmental research centre operating in Belarus. Macroeconomic variables covered by these forecasts and which the Group incorporated in its ECL assessment model include GDP growth, foreign exchange rate and inflation rate. These forward-looking macroeconomic variables are generally updated on a semi-annual basis for Georgian companies and on a quarterly basis for BNB.

The determination of the probability-weighted ECL requires evaluating a range of diverse and relevant future economic conditions. To accommodate this requirement, the Group uses three different economic scenarios in the ECL calculation: an upside, a base case and a downside scenario relevant for each respective portfolio. A weight is calculated for each scenario by using a probabilistic economic model that considers recent information as well as historical data provided by the NBG.

The Group considers these forecasts to represent its best estimate of the possible outcomes, based on reliable available information.

Forward-looking variable assumptions

The most significant period end assumptions used for ECL estimate as at 31 December 2024 per geographical segments are set out below. The scenarios "base", "upside" and "downside" were used for all portfolios.

Georgia

Key drivers	ECL scenario	Assigned weight	As at 31 December 2024			Assigned weight	As at 31 December 2023			Assigned weight	As at 31 December 2022		
			2025	2026	2027		2024	2025	2026		2023	2024	2025
GDP growth in %													
	Upside	25%	7.00%	6.00%	6.00%	25%	6.50%	5.50%	5.00%	25%	6.00%	5.00%	5.00%
	Base case	50%	4.90%	5.80%	5.70%	50%	5.00%	4.50%	5.00%	50%	4.00%	5.50%	5.00%
	Downside	25%	2.00%	3.00%	5.00%	25%	3.00%	4.00%	5.00%	25%	2.00%	4.00%	5.00%
GEL/USD exchange rate													
	Upside	25%	2.00%	3.00%	0.00%	25%	3.00%	2.00%	0.00%	25%	2.00%	0.00%	0.00%
	Base case	50%	0.00%	0.00%	0.00%	50%	0.00%	0.00%	0.00%	50%	0.00%	0.00%	0.00%
	Downside	25%	-15.00%	0.00%	5.00%	25%	-15.00%	0.00%	5.00%	25%	-15.00%	5.00%	5.00%
CPI inflation rate in %													
	Upside	25%	3.00%	3.00%	3.00%	25%	3.25%	3.00%	3.00%	25%	5.00%	3.00%	3.00%
	Base case	50%	2.90%	3.60%	2.70%	50%	3.60%	3.10%	3.00%	50%	5.30%	3.10%	3.00%
	Downside	25%	8.00%	5.00%	3.00%	25%	5.00%	4.00%	3.00%	25%	9.00%	6.00%	3.00%

4. Significant accounting judgements and estimates (continued)

Forward-looking variable assumptions (continued)

Belarus

Key drivers	ECL scenario	Assigned weight	As at 31 December 2024		Assigned weight	As at 31 December 2023		Assigned weight	As at 31 December 2022	
			2025	2026		2024	2025		2023	2024
GDP growth in %										
	Upside	25.00%	4.75%	4.62%	25%	3.77%	3.13%	10%	2.66%	4.26%
	Base case	50.00%	2.64%	1.90%	50%	1.95%	0.49%	50%	0.31%	0.50%
	Downside	25.00%	0.53%	-0.83%	25%	0.14%	-2.15%	40%	-2.05%	-3.26%
BYN/USD exchange rate %										
	Upside	25.00%	-0.24%	-0.08%	25%	0.66%	0.62%	10%	0.71%	0.65%
	Base case	50.00%	0.82%	1.64%	50%	1.00%	1.23%	50%	2.53%	1.65%
	Downside	25.00%	1.73%	2.98%	25%	1.31%	1.77%	40%	4.09%	2.41%
CPI inflation rate in %										
	Upside	25.00%	-0.38%	-0.45%	25%	-0.09%	-0.52%	10%	0.38%	-0.58%
	Base case	50.00%	1.61%	1.91%	50%	1.94%	1.82%	50%	2.20%	1.66%
	Downside	25.00%	3.50%	4.12%	25%	3.86%	4.01%	40%	3.93%	3.76%

All other parameters held constant, increase in GDP growth and decrease in foreign exchange rate and inflation would result in decrease in ECL, with opposite changes resulting in ECL increase. GDP growth input has the most significant impact on ECL, followed by foreign exchange rate and inflation. Retail portfolio ECL is less affected by foreign exchange rate inputs due to larger share of GEL-denominated exposures. However, retail portfolio ECL is affected by inflation, which does not have a significant impact on corporate ECL.

The table below shows the sensitivity of the recognised ECL amounts to the forward-looking assumptions used in the model. For these purposes, 100% weight is assigned to each macroeconomic scenario separately and respective ECL is recalculated.

Sensitivity of ECL to forward looking assumptions

	As at 31 December 2024				
	Reported ECL	*Reported ECL coverage*	*ECL coverage by scenarios*		
Key drivers			*Upside*	*Base case*	*Downside*
Commercial loans	130,218	1.49%	1.47%	1.48%	1.51%
Residential mortgage loans	10,498	0.21%	0.21%	0.21%	0.21%
Micro and SME loans	77,958	1.76%	1.73%	1.75%	1.79%
Consumer loans	136,987	2.21%	2.14%	2.18%	2.36%
Gold – pawn loans	1,013	0.66%	0.66%	0.66%	0.66%

	As at 31 December 2023				
	Reported ECL	*Reported ECL coverage*	*ECL coverage by scenarios*		
Key drivers			*Upside*	*Base case*	*Downside*
Commercial loans	98,359	1.41%	1.37%	1.40%	1.44%
Residential mortgage loans	22,748	0.50%	0.49%	0.50%	0.51%
Micro and SME loans	71,661	1.76%	1.74%	1.76%	1.78%
Consumer loans	131,633	2.80%	2.75%	2.79%	2.86%
Gold – pawn loans	1,389	0.92%	0.92%	0.92%	0.93%

	As at 31 December 2022				
	Reported ECL	*Reported ECL coverage*	*ECL coverage by scenarios*		
Key drivers			*Upside*	*Base case*	*Downside*
Commercial loans	89,418	1.69%	1.55%	1.67%	1.78%
Residential mortgage loans	30,053	0.72%	0.71%	0.71%	0.73%
Micro and SME loans	63,490	1.66%	1.61%	1.65%	1.70%
Consumer loans	135,450	3.76%	3.70%	3.74%	3.84%
Gold – pawn loans	5,440	3.31%	3.30%	3.30%	3.31%

Aggregation of financial instruments for collective assessment

For the purpose of a collective evaluation of impairment, financial instruments are grouped within homogeneous pools as follows: corporate loan portfolio is grouped on the basis of loan repayment source type; and retail loan portfolio is grouped on the basis of credit risk characteristics such as an asset type, collateralisation level, repayment source type and other relevant factors. As for SME and Micro loan portfolios, financial instruments are grouped based on asset type, overdue buckets, collateralisation level and other relevant factors.

4. Significant accounting judgements and estimates (continued)

Forward-looking variable assumptions (continued)

Determination of expected life for revolving facilities

For revolving products, the expected life of financial instruments is determined either with reference to the next renewal date or with reference to the behavioural expected life of the financial instrument estimated based on the empirical observation of the lifetime.

Write-offs

The Group writes off financial assets when there is no reasonable expectation of recovery. The need for write-off of corporate loans is assessed individually, for mortgages and other loans secured by real estate, the number of overdue days after which the balances are considered to be irrecoverable and are to be written off is 1,460 days, while other non-secured portfolio is written-off after 150 days overdue. If the amount to be written off is greater than the accumulated loan loss allowance, the difference is first treated as an ECL expense. Any subsequent recoveries are credited to ECL expense.

Back testing of ECL calculation model

In order to monitor the quality and reliability of the Group's ECL calculation model, the Group periodically performs back testing and benchmarking procedures, whereby model outcomes are compared with actual results, based on internal experience as well as externally observed results. For PD, the Group uses statistical modelling to derive a predicted distribution of the number of defaults. The observed number of defaults is then compared with this distribution, allowing the Group to derive a statistical level of confidence in the model. For LGD, the back testing compares observed losses with predicted LGDs. If any statistically significant deviations or shortcomings in parameterisations are observed, the relevant models are redefined and recalibrated. Any changes in the model as a result of back testing procedures are accounted as changes in accounting estimates with prospective application.

Impact of climate-related risks on accounting judgements and estimates

Climate, and the impact of climate on the Group's balance sheet is considered as an area of accounting estimate and judgment through the uncertainty of future events and the impact of that uncertainty on the Group's assets and liabilities. While the effects of climate change are a source of uncertainty, as at 31 December 2024 management does not consider climate to have a quantitatively material impact on its financial statements. The Group has assessed the impact of climate risk on its financial statements as disclosed below.

The estimated areas of impact, limited to a qualitative assessment, were expected credit loss and the impact on lending portfolios including physical risk on the mortgage lending portfolio and forward-looking cash flows that impact the recoverability of certain assets. Transition risk is managed through reviews of clients by the Group's Risk function which includes ongoing process of identifying clients susceptible to climate transition risks.

The Group Climate Risk team have performed a top-down qualitative assessment of the impact of climate risk on the IFRS 9 ECL provision. This assessment has mostly been focused across corporate and mortgage portfolios. The portfolios identified as most susceptible to climate risks were identified as mining and quarrying, heavy metals and construction, concentration of which is not significant for overall Group's loan exposure. The assessment of the portfolios is undertaken by considering the maturity profile of the exposures which is relatively shorter term compared to long term climate impact. The above assessment did not result in any material effect on the Group's consolidated financial statements.

While some indicators that are more influenced by climate change are factored into the current PD models where they have demonstrated statistical relevance, the Group currently does not use a specific climate risk related scenario in addition to the existing economic scenarios applied to derive the weighted-average ECL. The reason for this is lack of sufficient historical data and limitations in the risk assessments. Where climate factors have impacted the economy in the recent past or present, these impacts are implicitly embedded in the Group's IFRS9 ECL models through the projected macroeconomic indicators (e.g. inflation rates) and individual analysis of corporate loan related cash flows.

It should also be noted that the Group is currently working on a corporate plan in respect of its response to climate risks, with the commitment to transition away or limit certain high carbon sector financing while introducing more green finance products.

Based on the best information available at the time these consolidated annual financial statements were prepared, the Group sees no additional climate change risk having a substantial impact on its equity, financial situation and results in 2025. However, as the matter is constantly changing, the Group is working on developing methodologies to better measure potential loan loss in line with the new management needs, best practice and regulators' requirements.

5. Segment information

Management reviews the Group's internal reporting in order to assess performance and to allocate resources. During 2024, the Group reconsidered the segmentation by aggregating segments under respective business divisions considering geography, business nature and other economic characteristics. Further, the Group separated Corporate Center (CC) as a segment under Georgian Financial Services business division. The Group reassessed the presentation of net interest income and net fee and commission income, deciding to disaggregate these items and separately present intersegment interest income/expenses. The comparative figures have been restated accordingly to reflect this change.

For management purposes, the Group is organised into the following business lines and respective operating segments:

Georgian Financial Services business division:

RB - Retail Banking (excluding Retail Banking of BNB) – principally provides consumer loans, mortgage loans, overdrafts, credit cards and other credit facilities, funds transfers and settlement services, and handling of customers' deposits for both individuals and legal entities. The Retail Banking business targets the mass retail, mass affluent and high-net-worth client segments.

SME - SME Banking (excluding SME Banking of BNB) – principally provides SME loans, micro loans, consumer and mortgage loans, funds transfers and settlement services, and handling of customers' deposits for legal entities. The SME Banking business targets small and medium-sized enterprises and micro businesses.

CB - Corporate Banking - principally provides loans and other credit facilities, funds transfers and settlement services, trade finance services, documentary operations support and handles saving and term deposits for corporate and institutional customers.

CC - Corporate center – comprises mainly treasury and custody operations.

Other businesses:

Other - Mainly comprising JSC Belarusky Narodny Bank, principally providing retail and corporate banking services in Belarus, gain from associate operating in Armenia and respective eliminations.

Management monitors the operating results of its segments separately for the purpose of making decisions about resource allocation and performance assessment. Segment performance, as explained in the table below, is measured in the same manner as profit or loss in the consolidated income statement

Transactions between operating segments are on an arm's length basis in a similar manner to transactions with third parties.

The Group's operations are primarily concentrated in Georgia, except for BNB, which operates in Belarus and associate that operates in Armenia.

No revenue from transactions with a single external customer or counterparty amounted to 10% or more of the Group's operating income in 2024, 2023 or 2022.

5. Segment information (continued)

The following table presents the income statement and certain asset and liability information regarding the Group's operating segments as at and for the year ended 31 December 2024:

	Retail Banking	*SME*	*Corporate Investment Banking*	*Corporate center*	*Eliminations*	***Georgian Financial services***	***Other businesses***	***Group Total***
Interest Income	*1,523,883*	*554,087*	*927,582*	*248,621*	-	*3,254,173*	84,268	3,338,441
Interest expense	*(614,146)*	*(130,780)*	*(476,927)*	*(242,621)*	-	(1,464,474)	(31,220)	(1,495,694)
Inter-segment interest income/(expense)	*46,352*	*(149,307)*	*98,775*	*4,180*	-	-	-	-
Net interest income	***956,089***	***274,000***	***549,430***	***10,180***	**-**	**1,789,699**	***53,048***	**1,842,747**
Fee and commission income	598,958	59,915	68,655	8,830	-	736,358	50,089	786,447
Settlements operations	*539,859*	*43,665*	*14,532*	*5,104*	-	603,160	*43,299*	646,459
Currency conversion operations	*47,387*	*1,722*	*3,185*	-	-	52,294	*1*	52,295
Guarantees and letters of credit	*406*	*8,437*	*45,502*	-	-	54,345	*704*	55,049
Cash operations	*7,431*	*5,857*	*4,446*	*584*	-	18,318	*5,637*	23,955
Brokerage service fees	*3*	*224*	*162*	-	-	389	-	389
Other	*3,872*	*10*	*828*	*3,142*	-	7,852	*448*	8,300
Fee and commission expense	(323,448)	(16,383)	(13,280)	(4,006)	-	(357,117)	*(41,522)*	(398,639)
Settlements operations	*(294,977)*	*(14,327)*	*(5,051)*	-	-	(314,355)	*(35,925)*	(350,280)
Currency conversion operations	*(8,694)*	*(320)*	*(585)*	-	-	(9,599)	*(554)*	(10,153)
Guarantees and letters of credit	*(5)*	*(11)*	*(217)*	-	-	(233)	*(5)*	(238)
Advisory	-	-	-	-	-	-	-	-
Cash operations	*(6,744)*	*(1,326)*	*(5,996)*	*(3,999)*	-	(18,065)	*(5,039)*	(23,104)
Brokerage service fees	*(864)*	*(399)*	*(432)*	*(7)*	-	(1,702)	-	(1,702)
Other	*(12,164)*	-	*(999)*	-	-	(13,163)	*1*	(13,162)
Net fee and commission income	***275,510***	***43,532***	***55,375***	***4,824***	**-**	**379,241**	***8,567***	**387,808**
Net foreign currency gain	*177,689*	*44,241*	*108,262*	*57,170*	-	387,362	59,357	446,719
Net gains/(losses) on extinguishment of debt	-	*2*	*8*	-	-	10	2	12
Net other gains/(losses)	*21,901*	*7,145*	*17,106*	*2,137*	*(78)*	48,211	*1,232*	49,443
Operating income	***1,431,189***	***368,920***	***730,181***	***74,311***	***(78)***	**2,604,523**	**122,206**	**2,726,729**
Operating expenses	*(463,418)*	*(108,562)*	*(117,379)*	*(25,614)*	*78*	(714,895)	(75,268)	(790,163)
Profit from associates	-	-	-	*1,347*	-	1,347	291,723	293,070
Operating income before cost of risk	***967,771***	***260,358***	***612,802***	***50,044***	**-**	**1,890,975**	**338,661**	**2,229,636**
Cost of risk	*(44,458)*	*(16,782)*	*(35,126)*	*(1,949)*	-	(98,315)	(3,849)	(102,164)
Net operating income before non-recurring items	***923,313***	***243,576***	***577,676***	***48,095***	**-**	**1,792,660**	**334,812**	**2,127,472**
Net non-recurring items	-	-	-	-	-	-	-	-
Profit before income tax	***923,313***	***243,576***	***577,676***	***48,095***	**-**	**1,792,660**	**334,812**	**2,127,472**
Income tax expense	*(161,298)*	*(42,429)*	*(98,160)*	*26,335*	-	(275,552)	(14,021)	(289,573)
Profit for the year	***762,015***	***201,147***	***479,516***	***74,430***	**-**	**1,517,108**	**320,791**	**1,837,899**
Assets and liabilities								
Total assets	*16,070,301*	5,771,629	11,070,966	4,570,475	(509)	37,482,862	1,790,301	39,273,163
Total liabilities	*13,976,374*	4,955,018	9,124,047	4,308,976	(509)	32,363,906	1,278,759	33,642,665
Other segment information								
Property and equipment	*83,285*	8,174	3,067	63	-	94,589	2,928	97,517
Intangible assets	*41,258*	7,929	2,535	250	-	51,972	7,702	59,674
Capital expenditure	**124,543**	**16,103**	**5,602**	**313**	**-**	**146,561**	**10,630**	**157,191**
Depreciation, amortisation and impairment	*(91,120)*	(13,198)	(4,996)	(219)	-	(109,533)	(8,611)	(118,144)

5. Segment information (continued)

The following table presents the income statement and certain asset and liability information regarding the Group's operating segments as at and for the year ended 31 December 2023:

	Retail Banking	*SME*	*Corporate Investment Banking*	*Corporate center*	*Eliminations*	***Georgian Financial services***	***Other businesses***	***Group Total***
Interest Income	*1,243,950*	*505,719*	*744,824*	*163,421*	-	*2,657,914*	71,371	2,729,285
Interest expense	*(460,026)*	*(109,876)*	*(395,373)*	*(155,200)*	-	(1,120,475)	(22,810)	(1,143,285)
Inter-segment interest income/(expense)	*(8,823)*	*(126,741)*	*135,075*	*489*	-	-	-	-
Net interest income	***775,101***	***269,102***	***484,526***	***8,710***	**-**	**1,537,439**	***48,561***	**1,586,000**
Fee and commission income	507,838	51,080	55,999	8,041	-	622,958	46,578	669,536
Settlements operations	*446,112*	*34,659*	*12,316*	*5,394*	-	498,481	*39,249*	537,730
Currency conversion operations	*45,252*	*1,690*	*2,421*	-	-	49,363	*7*	49,370
Guarantees and letters of credit	*221*	*8,308*	*36,240*	-	-	44,769	*554*	45,323
Cash operations	*10,931*	*5,918*	*3,665*	*1,016*	-	21,530	*6,405*	27,935
Brokerage service fees	-	*405*	*211*	-	-	616	-	616
Other	*5,322*	*100*	*1,146*	*1,631*	-	8,199	*363*	8,562
Fee and commission expense	(264,157)	(17,566)	(6,196)	(1,747)	-	(289,666)	*(39,198)*	(328,864)
Settlements operations	*(241,627)*	*(15,797)*	*(455)*	-	-	(257,879)	*(33,226)*	(291,105)
Currency conversion operations	*(7,851)*	*(302)*	*(424)*	-	-	(8,577)	*(394)*	(8,971)
Guarantees and letters of credit	*(2)*	*(15)*	*(212)*	-	-	(229)	*(10)*	(239)
Advisory	-	-	-	-	-	-	-	-
Cash operations	*(6,817)*	*(1,035)*	*(4,309)*	*(1,744)*	-	(13,905)	*(5,568)*	(19,473)
Brokerage service fees	*(823)*	*(416)*	*(357)*	*(4)*	-	(1,600)	-	(1,600)
Other	*(7,037)*	*(1)*	*(439)*	*1*	-	(7,476)	-	(7,476)
Net fee and commission income	***243,681***	***33,514***	***49,803***	***6,294***	**-**	**333,292**	***7,380***	**340,672**
Net foreign currency gain (loss)	*153,269*	*37,263*	*90,758*	*47,954*	-	329,244	41,603	370,847
Net gains/(losses) on extinguishment of debt	-	*81*	*262*	-	-	343	221	564
Net other gains/(losses)	*7,022*	*3,127*	*84,101*	*18,562*	*(83)*	*112,729*	*1,817*	114,546
Operating income	***1,179,073***	***343,087***	***709,450***	***81,520***	***(83)***	**2,313,047**	***99,582***	**2,412,629**
Operating expenses	*(396,841)*	*(95,219)*	*(104,684)*	*(16,737)*	*83*	(613,398)	(65,557)	(678,955)
Profit from associates	-	-	-	*984*	-	984	-	984
Operating income before cost of risk	***782,232***	***247,868***	***604,766***	***65,767***	**-**	**1,700,633**	**34,025**	**1,734,658**
Cost of risk	*(83,491)*	*(33,035)*	*(28,826)*	*732*	-	(144,620)	2,649	(141,971)
Profit before income tax	***698,741***	***214,833***	***575,940***	***66,499***	**-**	**1,556,013**	**36,674**	**1,592,687**
Income tax expense	*(125,455)*	*(37,676)*	*(97,705)*	*10,346*	-	(250,490)	(8,478)	(258,968)
Profit for the year	***573,286***	***177,157***	***478,235***	***76,845***	**-**	**1,305,523**	**28,196**	**1,333,719**
Assets and liabilities								
Total assets	*13,600,818*	*5,224,194*	*8,498,832*	*2,811,590*	*(880)*	30,134,554	1,259,556	31,394,110
Total liabilities	*11,964,056*	*4,541,098*	*7,000,703*	*2,328,184*	*(880)*	25,833,161	1,108,899	26,942,060
Other segment information								
Property and equipment	*75,475*	8,487	2,574	-	-	86,536	5,273	91,809
Intangible assets	*32,443*	6,261	2,191	-	-	40,895	7,031	47,926
Capital expenditure	**107,918**	***14,748***	***4,765***	**-**	**-**	**127,431**	**12,304**	**139,735**
Depreciation, amortisation and impairment	*(84,189)*	*(12,411)*	*(4,880)*	-	-	*(101,480)*	(9,260)	(110,740)

5. Segment information (continued)

The following table presents the income statement and certain asset and liability information regarding the Group's operating segments as at and for the year ended 31 December 2022:

	Retail Banking	*SME*	*Corporate Investment Banking*	*Corporate center*	*Eliminations*	**Georgian Financial Services**	***Other businesses***	**Group Total**
Interest Income	*1,066,600*	*405,896*	*525,216*	*174,698*	-	*2,172,410*	71,618	2,244,028
Interest expense	*(421,147)*	*(127,072)*	*(294,521)*	*(192,655)*	-	(1,035,395)	(34,022)	(1,069,417)
Inter-segment interest income/(expense)	*(77,983)*	*(75,845)*	*152,234*	*1,594*	-	-	-	-
Net interest income	***567,470***	***202,979***	***382,929***	***(16,363)***	**-**	**1,137,015**	***37,596***	**1,174,611**
Fee and commission income	412,790	42,006	47,790	8,379	-	510,965	37,817	548,782
Settlements operations	*365,888*	*29,139*	*12,631*	*2,683*	-	410,341	*34,288*	444,629
Currency conversion operations	*30,413*	*1,241*	*2,891*	-	-	34,545	*1*	34,546
Guarantees and letters of credit	*2*	*5,901*	*28,585*	-	-	34,488	*795*	35,283
Advisory	-	-	-	-	-	-	-	-
Cash operations	*14,040*	*5,642*	*3,001*	*4,563*	-	27,246	*984*	28,230
Brokerage service fees	-	*49*	-	-	-	49	-	49
Other	*2,447*	*34*	*682*	*1,133*	-	4,296	*1,749*	6,045
Fee and commission expense	(237,164)	(13,870)	(3,407)	(6,605)	-	(261,046)	*(26,316)*	(287,362)
Settlements operations	*(220,809)*	*(11,526)*	*(572)*	-	-	(232,907)	*(15,623)*	(248,530)
Currency conversion operations	*(4,538)*	*(159)*	*(367)*	-	-	(5,064)	*(314)*	(5,378)
Guarantees and letters of credit	*(1)*	*(6)*	*(109)*	-	-	(116)	*(207)*	(323)
Advisory	-	-	-	-	-	-	-	-
Cash operations	*(5,940)*	*(1,897)*	*(1,795)*	*(6,622)*	-	(16,254)	*(10,172)*	(26,426)
Brokerage service fees	*(658)*	*(282)*	*(229)*	*17*	-	(1,152)	-	(1,152)
Other	*(5,218)*	-	*(335)*	-	-	(5,553)	-	(5,553)
Net fee and commission income	***175,626***	***28,136***	***44,383***	***1,774***	**-**	**249,919**	***11,501***	**261,420**
Net foreign currency gain (loss)	*161,153*	*34,637*	*108,339*	*94,580*	-	398,709	64,493	463,202
Net gains/(losses) on extinguishment of debt	-	*(2,837)*	*(5,321)*	-	-	(8,158)	(304)	(8,462)
Net other gains/(losses)	*10,313*	*1,881*	*16,824*	*7,352*	-	36,370	*4,186*	40,556
Operating income	***914,562***	***264,796***	***547,154***	***87,343***	**-**	**1,813,855**	***117,472***	**1,931,327**
Operating expenses	*(327,194)*	*(90,153)*	*(92,005)*	*(14,449)*	-	(523,801)	(57,867)	(581,668)
Profit from associates	-	-	-	*819*	-	819	-	819
Operating income before cost of risk	***587,368***	***174,643***	***455,149***	***73,713***	**-**	**1,290,873**	**59,605**	**1,350,478**
Cost of risk	*(163,632)*	*(8,900)*	*32,655*	*(1,960)*	-	(141,837)	(25,827)	(167,664)
Profit before income tax	***423,736***	***165,743***	***487,804***	***71,753***	**-**	**1,149,036**	**33,575**	**1,182,611**
Income tax expense	*(83,346)*	*(29,636)*	*(81,196)*	*11,255*	-	(182,923)	(7,684)	(190,607)
Profit for the year	***340,390***	***136,107***	***406,608***	***83,008***	**-**	**966,113**	**25,891**	**992,004**
Assets and liabilities								
Total assets	*12,458,908*	*4,755,147*	*7,310,942*	*2,542,226*	*(486)*	27,066,737	1,300,321	28,367,058
Total liabilities	*10,930,881*	*4,132,009*	*6,127,639*	*2,242,638*	*(486)*	23,432,681	1,147,009	24,579,690
Other segment information								
Property and equipment	*59,156*	6,925	2,406	-	-	68,487	2,249	70,736
Intangible assets	*21,540*	5,706	1,992	-	-	29,238	4,886	34,124
Capital expenditure	***80,696***	***12,631***	***4,398***	**-**	**-**	**97,725**	**7,135**	**104,860**
Depreciation, amortisation and impairment	*(72,064)*	*(13,296)*	*(4,559)*	-	-	*(89,919)*	(6,058)	(95,977)

6. Cash and cash equivalents

	2024	*2023*	*2022*
Cash on hand	1,105,924	966,670	1,000,596
Current accounts with credit institutions	675,438	650,630	927,388
Time deposits with credit institutions with maturities of up to 90 days	307,938	712,786	762,592
Current accounts with central banks, exduding obligatory reserves	189,410	713,212	805,503
Cash and cash equivalents, gross	**2,278,710**	**3,043,298**	**3,496,079**
Less – Allowance for expected credit loss	(234)	(466)	(351)
Cash and cash equivalents, net	**2,278,476**	**3,042,832**	**3,495,728**

As at 31 December 2024, GEL 711,548 (2023: GEL 974,224, 2022: GEL 1,453,123) was placed on current and time deposit accounts with internationally recognised OECD banks and central banks that are the counterparties of the Group in performing international settlements. The Group earned between 0.00%-4.60% interest per annum on these deposits (2023: up to 10.35%, 2022: up to 11.10%). Management does not expect any losses from non-performance by the counterparties holding cash and cash equivalents, and there are no material differences between their book and fair values.

7. Amounts due from credit institutions

	2024	*2023*	*2022*
Obligatory reserves with central banks	2,440,549	1,746,289	2,354,470
Receivables from reverse REPO operations	13,423	-	-
Restricted cash	3,209	7,263	68,154
Amounts due from credit institutions, gross	**2,457,181**	**1,753,552**	**2,422,624**
Less – Allowance for expected credit loss	(491)	(894)	(5,318)
Amounts due from credit institutions, net	**2,456,690**	**1,752,658**	**2,417,306**

Obligatory reserves with central banks represent amounts deposited with the NBG and National Bank of the Republic of Belarus (the "NBRB"). Credit institutions are required to maintain cash deposits (obligatory reserve) with the NBG and with the NBRB, the amount of which depends on the level of funds attracted by the credit institution. The Group's ability to withdraw these deposits is restricted by regulation. The Group did not earn interest on obligatory reserves with NBG and NBRB for the years ended 31 December 2024, 31 December 2023 and 31 December 2022.

8. Investment securities and Investment securities pledged under sale and repurchase agreements and securities lending

Investment securities

	2024	*2023*	*2022*
Investment securities measured at FVOCI - debt instruments [1]	5,907,282	4,349,609	3,960,300
Investment securities designated as at FVOCI - equity investments	9,029	7,098	4,912
Investment securities measured at FVOCI	**5,916,311**	**4,356,707**	**3,965,212**

	2024	*2023*	*2022*
Investment securities measured at amortized cost [2]	1,910,870	524,433	381,735
Less: allowance for credit losses	(391)	(325)	(3,198)
Investment securities measured at amortized cost, net	**1,910,479**	**524,108**	**378,537**

[1] Investment securities measured at FVOCI - debt instruments comprise:

	2024	*2023*	*2022*
Ministry of Finance of Georgia treasury bonds	3,336,867	1,891,684	1,350,555
Ministry of Finance of Georgia treasury bills	106,139	155,955	176,483
US treasury bills	1,283,392	1,621,219	1,062,095
US treasury bonds	310,718	-	-
Foreign treasury bills	61,354	-	-
Foreign treasury bonds	-	54,151	92,816
Certificates of deposit of central banks	27,630	10,855	17,675
Other debt instruments [1.1]	781,182	615,745	1,260,676
Investment securities measured at FVOCI - debt instruments	**5,907,282**	**4,349,609**	**3,960,300**

[1.1] Other debt instruments measured at FVOCI comprise:

	2024	*2023*	*2022*
European Bank for Reconstruction and Development	316,680	326,916	531,351
International Finance Corporation	116,089	203,617	56,523
Asian Development Bank	110,989	30,594	107,835
Nederlandse Financierings-Maatschappij voor Ontwikkelingslanden N.V.	75,552	-	-
The Netherlands Development Finance Company	-	-	131,126
Black Sea Trade and Development Bank	-	-	200,913
Other debt instruments	161,872	54,618	232,928
Investment securities measured at FVOCI - other debt instruments	**781,182**	**615,745**	**1,260,676**

8. Investment securities and Investment securities pledged under sale and repurchase agreements and securities lending (continued)

Investment securities (continued)

[2] Investment securities measured at amortised cost - debt instruments comprise:

	2024	*2023*	*2022*
Ministry of Finance of Georgia treasury bonds	58,393	-	119,918
US treasury bonds	263,212	-	-
Other debt instruments [2.1]	1,589,265	524,433	261,817
Investment securities measured at amortized cost - debt instruments, gross	**1,910,870**	**524,433**	**381,735**
Less: allowance for credit losses	(391)	(325)	(3,198)
Investment securities measured at amortized cost, net	**1,910,479**	**524,108**	**378,537**

[2.1] Other debt instruments measured at amortised cost comprise:

	2024	*2023*	*2022*
European Bank for Reconstruction and Development	1,011,633	-	-
Asian Development Bank	318,713	287,326	-
Nederlandse Financierings-Maatschappij voor Ontwikkelingslanden N.V.	100,267	100,297	-
Tegeta Motors LLC	43,022	40,647	-
FMO	-	-	100,341
JSC TBC Bank	-	-	53,608
Other Bonds	115,630	96,163	107,868
Investment securities measured at amortized cost - other debt instruments	1,589,265	524,433	261,817

Investment securities pledged for short-term loans from the central banks	***2024***	***2023***	***2022***
Georgian Ministry of Finance treasury bonds	1,336,096	1,375,687	709,597
Other debt instruments	541,939	127,685	121,592
Total	**1,878,035**	**1,503,372**	**831,189**
Out of which:			
Measured at FVOCI	1,336,096	1,375,687	831,189
Measured at amortised cost	541,939	127,685	-

Investment securities pledged for MOF	***2024***	***2023***	***2022***
Georgian Ministry of Finance treasury bonds	300,256	-	-
Other debt instruments	543,513	-	-
Total	**843,769**	**-**	**-**
Out of which:			
Measured at FVOCI	300,256	-	-
Measured at amortised cost	543,513	-	-

Investment securities pledged for repo-operations with commercial banks	***2024***	***2023***	***2022***
Georgian Ministry of Finance treasury bonds	-	-	380,065
Total	-	-	380,065
Out of which:			
Measured at FVOCI	-	-	380,065
Measured at amortised cost	-	-	-

For the period ended 31 December 2024 net gains on derecognition of investment securities comprised GEL 1,631(2023: GEL18,512, 2022: GEL7,528) which is included in net other income.

As at 31 December 2024, allowance for expected credit loss on investment securities measured at FVOCI comprised GEL 10,811 (2023: GEL 7,673, 2022: GEL 7,068).

Investment securities pledged under sale and repurchase agreements and securities lending

	2024	*2023*	*2022*
Investment securities pledged under sale and repurchase agreements and securities lending measured at FVOCI - debt instruments	138,945	-	-
Investment securities pledged under sale and repurchase agreements and securities lending measured at FV	**138,945**	**-**	**-**

9. Loans to customers, factoring and finance lease receivables

	2024	*2023*	*2022*
Commercial loans	8,762,318	6,979,330	5,279,956
Consumer loans	6,187,049	4,699,969	3,602,054
Residential mortgage loans	5,032,418	4,557,525	4,193,204
Micro and SME loans	4,441,390	4,073,022	3,820,513
Gold – pawn loans	154,242	150,228	164,554
Loans to customers at amortised cost, gross	**24,577,417**	**20,460,074**	**17,060,281**
Less – Allowance for expected credit loss	(356,674)	(325,790)	(323,851)
Loans to customers at amortised cost, net	**24,220,743**	**20,134,284**	**16,736,430**
Finance lease receivables, gross	**68,998**	**70,091**	**90,742**
Less – Allowance for expected credit loss	(9,754)	(11,208)	(8,698)
Finance lease receivables, net	**59,244**	**58,883**	**82,044**
Factoring receivables, gross	**36,180**	**55,027**	**23,411**
Less – Allowance for expected credit loss	(12)	(127)	(282)
Factoring receivables, net	**36,168**	**54,900**	**23,129**
Total loans to customers, factoring and finance lease receivables	**24,316,155**	**20,248,067**	**16,841,603**

As at 31 December 2024, loans to customers carried at GEL 1,044,929 (2023: GEL 954,695, 2022: GEL 1,092,475) were pledged for short-term loans from the NBG.

Expected credit loss

Movements of the gross loans and respective allowance for expected credit loss / impairment of loans to customers by class are provided in the table below, within which the new financial asset originated or purchased and the assets repaid during the year include the effects from revolving loans and increase of exposure to clients, where existing loans have been repaid with new contracts issued during the year. All new financial assets are originated either in Stage 1 or POCI category. Utilisation of additional tranches on existing financial assets are reflected in Stage 2 or Stage 3 if the credit risk of the borrower has deteriorated since initiation. Currency translation differences relate to loans issued by the subsidiaries of the Group whose functional currency is different from the presentation currency of the Group, while foreign exchange movement relates to foreign currency denominated loans issued by the Group. Net other changes in gross loan balances includes the effects of changes in accrued interest. Net other measurement of ECL includes the effect of changes in ECL due to post-model adjustments, changes in PDs and other inputs, as well as the effect from ECL attributable to changes in accrued interest.

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Commercial loans at amortised cost, gross:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2023	**6,342,245**	**515,789**	**97,721**	**23,575**	**6,979,330**
New financial asset originated or purchased	7,088,579	79,500	1,810	3,307	7,173,196
Transfer to Stage 1	95,934	(95,934)	-	-	-
Transfer to Stage 2	(240,626)	244,577	(3,951)	-	-
Transfer to Stage 3	(767)	(126,968)	127,735	-	-
Assets repaid	(5,257,895)	(347,114)	(53,554)	(14,261)	(5,672,824)
Resegmentation	64,659	(1,644)	(3,641)	-	59,374
Impact of modifications	(373)	(1,176)	(92)	(24)	(1,665)
Write-offs	-	-	(3,121)	-	(3,121)
Recoveries of amounts previously written off	-	-	1,797	129	1,926
Unwind of discount	-	-	2,331	677	3,008
Currency translation differences	19,378	326	872	-	20,576
Foreign exchange movement	134,832	9,108	2,520	656	147,116
Net other changes	51,803	1,607	3,303	(1,311)	55,402
Balance at 31 December 2024	**8,297,769**	**278,071**	**173,730**	**12,748**	**8,762,318**
Individually assessed	-	-	165,081	11,194	176,275
Collectively assessed	8,297,769	278,071	8,649	1,554	8,586,043
Balance at 31 December 2024	**8,297,769**	**278,071**	**173,730**	**12,748**	**8,762,318**

Commercial loans at amortised cost, ECL:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2023	**14,098**	**33,193**	**42,127**	**8,941**	**98,359**
New financial asset originated or purchased	19,837	724	760	2,071	23,392
Transfer to Stage 1	2,537	(2,537)	-	-	-
Transfer to Stage 2	(4,559)	4,559	-	-	-
Transfer to Stage 3	(263)	(26,706)	26,969	-	-
Impact on ECL of exposures transferred between stages during the year	(1,557)	5,205	47,622	-	51,270
Assets repaid	(11,052)	(12,717)	(17,522)	(5,014)	(46,305)
Resegmentation	162	(84)	(1,667)	-	(1,589)
Impact of modifications	(2)	9	78	(10)	75
Foreign exchange movement	64	97	818	301	1,280
Net other measurement of ECL	(5,112)	4,813	1,989	(1,362)	328
Income statement (releases)/charges	55	(26,637)	59,047	(4,014)	28,451
Write-offs	-	-	(3,121)	-	(3,121)
Recoveries of amounts previously written off	-	-	1,797	129	1,926
Unwind of discount	-	-	2,331	677	3,008
Currency translation differences	(97)	(87)	1,779	-	1,595
Balance at 31 December 2024	**14,056**	**6,469**	**103,960**	**5,733**	**130,218**
Individually assessed	-	-	99,430	5,719	105,149
Collectively assessed	14,056	6,469	4,530	14	25,069
Balance at 31 December 2024	**14,056**	**6,469**	**103,960**	**5,733**	**130,218**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Residential mortgage loans at amortised cost, gross:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2023	**4,300,338**	**174,052**	**50,946**	**32,189**	**4,557,525**
New financial asset originated or purchased	1,576,144	1	235	6,028	1,582,408
Transfer to Stage 1	252,566	(252,566)	-	-	-
Transfer to Stage 2	(286,243)	304,904	(18,661)	-	-
Transfer to Stage 3	(5,106)	(30,102)	35,208	-	-
Assets repaid	(1,025,579)	(37,326)	(28,048)	(13,080)	(1,104,033)
Impact of modifications	1,242	71	897	12	2,222
Write-offs	-	-	(4,109)	(1,425)	(5,534)
Recoveries of amounts previously written off	-	-	3,385	(67)	3,318
Unwind of discount	-	-	(49)	(10)	(59)
Currency translation differences	1,293	23	8	-	1,324
Foreign exchange movement	27,934	560	539	418	29,451
Net other changes	(31,591)	(21,795)	11,933	7,249	(34,204)
Balance at 31 December 2024	**4,810,998**	**137,822**	**52,284**	**31,314**	**5,032,418**
Individually assessed	-	-	3,704	-	3,704
Collectively assessed	4,810,998	137,822	48,580	31,314	5,028,714
Balance at 31 December 2024	**4,810,998**	**137,822**	**52,284**	**31,314**	**5,032,418**

Residential mortgage loans at amortised cost, ECL:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2023	**3,970**	**2,036**	**11,867**	**4,875**	**22,748**
New financial asset originated or purchased	2,303	-	16	933	3,252
Transfer to Stage 1	2,374	(2,374)	-	-	-
Transfer to Stage 2	(1,229)	4,476	(3,247)	-	-
Transfer to Stage 3	(18)	(469)	487	-	-
Impact on ECL of exposures transferred between stages during the year	(1,459)	(1,572)	2,484	-	(547)
Assets repaid	(713)	(707)	(9,286)	(3,604)	(14,310)
Impact of modifications	11	4	240	106	361
Foreign exchange movement	5	3	20	45	73
Net other measurement of ECL	(4,043)	(814)	4,084	1,963	1,190
Income statement (releases)/charges	(2,769)	(1,453)	(5,202)	(557)	(9,981)
Write-offs	-	-	(4,109)	(1,425)	(5,534)
Recoveries of amounts previously written off	-	-	3,385	(67)	3,318
Unwind of discount	-	-	(49)	(10)	(59)
Currency translation differences	2	(1)	5	-	6
Balance at 31 December 2024	**1,203**	**582**	**5,897**	**2,816**	**10,498**
Individually assessed	-	-	141	-	141
Collectively assessed	1,203	582	5,756	2,816	10,357
Balance at 31 December 2024	**1,203**	**582**	**5,897**	**2,816**	**10,498**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Micro and SME loans at amortised cost, gross:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2023	**3,709,870**	**191,530**	**168,425**	**3,197**	**4,073,022**
New financial asset originated or purchased	2,692,833	967	1,407	12,237	2,707,444
Transfer to Stage 1	144,721	(144,721)	-	-	-
Transfer to Stage 2	(288,337)	311,055	(22,718)	-	-
Transfer to Stage 3	(9,747)	(97,127)	106,874	-	-
Assets repaid	(2,140,954)	(60,408)	(84,365)	(1,337)	(2,287,064)
Resegmentation	(60,042)	1,644	3,641	-	(54,757)
Impact of modifications	82	(283)	(1,257)	29	(1,429)
Write-offs	-	-	(20,130)	(90)	(20,220)
Recoveries of amounts previously written off	-	-	9,366	124	9,490
Unwind of discount	-	-	2,746	30	2,776
Currency translation differences	4,785	299	507	-	5,591
Foreign exchange movement	39,474	1,508	1,966	(282)	42,666
Net other changes	(29,726)	(12,114)	5,270	441	(36,129)
Balance at 31 December 2024	**4,062,959**	**192,350**	**171,732**	**14,349**	**4,441,390**
Individually assessed	-	-	23,093	10,690	33,783
Collectively assessed	4,062,959	192,350	148,639	3,659	4,407,607
Balance at 31 December 2024	**4,062,959**	**192,350**	**171,732**	**14,349**	**4,441,390**

Micro and SME loans at amortised cost, ECL:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2023	**11,004**	**5,538**	**54,286**	**833**	**71,661**
New financial asset originated or purchased	11,277	2	293	7,924	19,496
Transfer to Stage 1	4,270	(4,270)	-	-	-
Transfer to Stage 2	(3,589)	8,771	(5,182)	-	-
Transfer to Stage 3	(757)	(5,102)	5,859	-	-
Impact on ECL of exposures transferred between stages during the year	(2,331)	(51)	19,218	-	16,836
Assets repaid	(5,400)	(2,044)	(33,809)	(281)	(41,534)
Resegmentation	(161)	84	1,667	-	1,590
Impact of modifications	4	4	(462)	21	(433)
Foreign exchange movement	44	(15)	475	(224)	280
Net other measurement of ECL	(3,283)	1,335	19,634	(237)	17,449
Income statement (releases)/charges	74	(1,286)	7,693	7,203	13,684
Write-offs	-	-	(20,130)	(90)	(20,220)
Recoveries of amounts previously written off	-	-	9,366	124	9,490
Unwind of discount	-	-	2,746	30	2,776
Currency translation differences	68	63	436	-	567
Balance at 31 December 2024	**11,146**	**4,315**	**54,397**	**8,100**	**77,958**
Individually assessed	-	-	7,641	7,128	14,769
Collectively assessed	11,146	4,315	46,756	972	63,189
Balance at 31 December 2024	**11,146**	**4,315**	**54,397**	**8,100**	**77,958**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Consumer loans at amortised cost, gross:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2023	**4,325,760**	**234,229**	**111,469**	**28,511**	**4,699,969**
New financial asset originated or purchased	6,072,381	29,708	4,132	3,652	6,109,873
Transfer to Stage 1	317,072	(317,013)	(59)	-	-
Transfer to Stage 2	(573,696)	615,638	(41,942)	-	-
Transfer to Stage 3	(6,832)	(102,783)	109,615	-	-
Assets repaid	(4,419,207)	(116,406)	(69,282)	(11,019)	(4,615,914)
Resegmentation	(4,686)	-	-	-	(4,686)
Impact of modifications	(750)	28	(4,818)	(90)	(5,630)
Write-offs	-	(3)	(78,373)	(1,446)	(79,822)
Recoveries of amounts previously written off	-	-	31,146	241	31,387
Unwind of discount	-	-	1,749	(27)	1,722
Currency translation differences	9,717	75	200	-	9,992
Foreign exchange movement	12,382	239	192	88	12,901
Net other changes	71,971	(89,988)	38,793	6,481	27,257
Balance at 31 December 2024	**5,804,112**	**253,724**	**102,822**	**26,391**	**6,187,049**
Individually assessed	-	-	5,859	-	5,859
Collectively assessed	5,804,112	253,724	96,963	26,391	6,181,190
Balance at 31 December 2024	**5,804,112**	**253,724**	**102,822**	**26,391**	**6,187,049**

Consumer loans at amortised cost, ECL:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2023	**41,947**	**18,044**	**63,888**	**7,754**	**131,633**
New financial asset originated or purchased	77,530	1,664	2,203	932	82,329
Transfer to Stage 1	19,210	(19,181)	(29)	-	-
Transfer to Stage 2	(31,501)	57,304	(25,803)	-	-
Transfer to Stage 3	(179)	(21,301)	21,480	-	-
Impact on ECL of exposures transferred between stages during the year	(9,597)	2,719	28,102	-	21,224
Assets repaid	(61,257)	(21,938)	(66,705)	(4,909)	(154,809)
Resegmentation	(1)	-	-	-	(1)
Impact of modifications	(481)	1	(2,336)	(39)	(2,855)
Foreign exchange movement	-	9	73	17	99
Net other measurement of ECL	19,762	6,518	77,845	1,757	105,882
Income statement (releases)/charges	13,486	5,795	34,830	(2,242)	51,869
Write-offs	-	(3)	(78,373)	(1,446)	(79,822)
Recoveries of amounts previously written off	-	-	31,146	241	31,387
Unwind of discount	-	-	1,749	(27)	1,722
Currency translation differences	62	23	113	-	198
Balance at 31 December 2024	**55,495**	**23,859**	**53,353**	**4,280**	**136,987**
Individually assessed	-	-	3,200	-	3,200
Collectively assessed	55,495	23,859	50,153	4,280	133,787
Balance at 31 December 2024	**55,495**	**23,859**	**53,353**	**4,280**	**136,987**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Gold – pawn loans at amortised cost, gross:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2023	**137,416**	**8,696**	**4,116**	**-**	**150,228**
New financial asset originated or purchased	199,792	-	885	-	200,677
Transfer to Stage 1	9,208	(9,208)	-	-	-
Transfer to Stage 2	(13,774)	15,041	(1,267)	-	-
Transfer to Stage 3	(1,114)	(1,548)	2,662	-	-
Assets repaid	(176,370)	(7,352)	(3,964)	-	(187,686)
Resegmentation	69	-	-	-	69
Write-offs	-	(1)	(40)	-	(41)
Recoveries of amounts previously written off	-	-	3	-	3
Unwind of discount	-	-	(1)	-	(1)
Foreign exchange movement	4	-	-	-	4
Net other changes	(9,365)	21	333	-	(9,011)
Balance at 31 December 2024	**145,866**	**5,649**	**2,727**	**-**	**154,242**
Collectively assessed	145,866	5,649	2,727	-	154,242
Balance at 31 December 2024	**145,866**	**5,649**	**2,727**	**-**	**154,242**

Gold – pawn loans at amortised cost, ECL:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2023	**43**	**24**	**1,322**	**-**	**1,389**
New financial asset originated or purchased	5	-	58	-	63
Transfer to Stage 1	13	(13)	-	-	-
Transfer to Stage 2	(6)	75	(69)	-	-
Transfer to Stage 3	(1)	(2)	3	-	-
Impact on ECL of exposures transferred between stages during the year	(7)	(62)	136	-	67
Assets repaid	(22)	(10)	(373)	-	(405)
Net other measurement of ECL	(13)	(6)	(43)	-	(62)
Income statement (releases)/charges	(31)	(18)	(288)	-	(337)
Write-offs	-	(1)	(40)	-	(41)
Recoveries of amounts previously written off	-	-	3	-	3
Unwind of discount	-	-	(1)	-	(1)
Balance at 31 December 2024	**12**	**5**	**996**	**-**	**1,013**
Collectively assessed	12	5	996	-	1,013
Balance at 31 December 2024	**12**	**5**	**996**	**-**	**1,013**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Commercial loans at amortised cost, gross:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2022	**4,482,716**	**608,307**	**172,983**	**15,950**	**5,279,956**
New financial asset originated or purchased	6,307,552	62,180	8	15,820	6,385,560
Transfer to Stage 1	218,262	(218,262)	-	-	-
Transfer to Stage 2	(408,476)	413,729	(5,253)	-	-
Transfer to Stage 3	(9,314)	(35,720)	45,034	-	-
Assets repaid	(4,377,108)	(316,022)	(97,131)	(10,324)	(4,800,585)
Resegmentation	76,352	(56)	2,959	-	79,255
Impact of modifications	(755)	733	(143)	9	(156)
Write-offs	-	-	(11,502)	-	(11,502)
Recoveries of amounts previously written off	-	-	8,723	957	9,680
Unwind of discount	-	-	(2,224)	416	(1,808)
Currency translation differences	(113,669)	(3,701)	(4,516)	-	(121,886)
Foreign exchange movement	105,029	4,490	(365)	83	109,237
Net other changes	61,656	111	(10,852)	664	51,579
Balance at 31 December 2023	**6,342,245**	**515,789**	**97,721**	**23,575**	**6,979,330**
Individually assessed	-	-	89,158	21,497	110,655
Collectively assessed	6,342,245	515,789	8,563	2,078	6,868,675
Balance at 31 December 2023	**6,342,245**	**515,789**	**97,721**	**23,575**	**6,979,330**

Commercial loans at amortised cost, ECL:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2022	**19,090**	**23,469**	**42,292**	**4,567**	**89,418**
New financial asset originated or purchased	31,952	697	1	-	32,650
Transfer to Stage 1	3,811	(3,811)	-	-	-
Transfer to Stage 2	(5,004)	6,393	(1,389)	-	-
Transfer to Stage 3	(994)	(1,406)	2,400	-	-
Impact on ECL of exposures transferred between stages during the year	(1,777)	4,522	17,549	-	20,294
Assets repaid	(13,682)	(11,978)	(29,709)	(1,325)	(56,694)
Resegmentation	1,102	(1,224)	870	-	748
Impact of modifications	(1)	17	(149)	3	(130)
Foreign exchange movement	(14)	103	(641)	127	(425)
Net other measurement of ECL	(20,107)	16,327	16,960	4,195	17,375
Income statement (releases)/charges	(4,714)	9,640	5,892	3,000	13,818
Write-offs	-	-	(11,502)	-	(11,502)
Recoveries of amounts previously written off	-	-	8,723	957	9,680
Unwind of discount	-	-	(2,224)	416	(1,808)
Currency translation differences	(278)	84	(1,054)	1	(1,247)
Balance at 31 December 2023	**14,098**	**33,193**	**42,127**	**8,941**	**98,359**
Individually assessed	-	-	37,559	8,936	46,495
Collectively assessed	14,098	33,193	4,568	5	51,864
Balance at 31 December 2023	**14,098**	**33,193**	**42,127**	**8,941**	**98,359**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Residential mortgage loans at amortised cost, Gross:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2022	**3,925,906**	**169,566**	**69,657**	**28,075**	**4,193,204**
New financial asset originated or purchased	1,527,164	32	-	14,796	1,541,992
Transfer to Stage 1	268,798	(268,798)	-	-	-
Transfer to Stage 2	(320,140)	352,400	(32,260)	-	-
Transfer to Stage 3	(17,355)	(33,670)	51,025	-	-
Assets repaid	(1,081,098)	(45,148)	(37,682)	(11,487)	(1,175,415)
Impact of modifications	530	137	(83)	(185)	399
Write-offs	-	-	(2,534)	(263)	(2,797)
Recoveries of amounts previously written off	-	-	1,385	543	1,928
Unwind of discount	-	-	215	94	309
Currency translation differences	(6,950)	(170)	(85)	-	(7,205)
Foreign exchange movement	11,210	(150)	(263)	165	10,962
Net other changes	(7,727)	(147)	1,571	451	(5,852)
Balance at 31 December 2023	**4,300,338**	**174,052**	**50,946**	**32,189**	**4,557,525**
Individually assessed	-	-	168	2,092	2,260
Collectively assessed	4,300,338	174,052	50,778	30,097	4,555,265
Balance at 31 December 2023	**4,300,338**	**174,052**	**50,946**	**32,189**	**4,557,525**

Residential mortgage loans at amortised cost, ECL:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2022	**8,860**	**2,601**	**14,085**	**4,507**	**30,053**
New financial asset originated or purchased	8,396	-	-	-	8,396
Transfer to Stage 1	4,415	(4,415)	-	-	-
Transfer to Stage 2	(2,766)	9,962	(7,196)	-	-
Transfer to Stage 3	(3,612)	(1,152)	4,764	-	-
Impact on ECL of exposures transferred between stages during the year	(1,133)	(5,845)	5,016	-	(1,962)
Assets repaid	(1,516)	(747)	(8,701)	(3,395)	(14,359)
Impact of modifications	19	5	1,049	43	1,116
Foreign exchange movement	(1)	(3)	(46)	28	(22)
Net other measurement of ECL	(8,690)	1,632	3,842	3,318	102
Income statement (releases)/charges	(4,888)	(563)	(1,272)	(6)	(6,729)
Write-offs	-	-	(2,534)	(263)	(2,797)
Recoveries of amounts previously written off	-	-	1,385	543	1,928
Unwind of discount	-	-	215	94	309
Currency translation differences	(2)	(2)	(12)	-	(16)
Balance at 31 December 2023	**3,970**	**2,036**	**11,867**	**4,875**	**22,748**
Individually assessed	-	-	50	271	321
Collectively assessed	3,970	2,036	11,817	4,604	22,427
Balance at 31 December 2023	**3,970**	**2,036**	**11,867**	**4,875**	**22,748**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Micro and SME loans at amortised cost, gross:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2022	**3,470,689**	**200,463**	**146,517**	**2,844**	**3,820,513**
New financial asset originated or purchased	2,718,907	606	1,502	1,685	2,722,700
Transfer to Stage 1	147,013	(147,013)	-	-	-
Transfer to Stage 2	(308,398)	332,863	(24,465)	-	-
Transfer to Stage 3	(20,855)	(115,229)	136,084	-	-
Assets repaid	(2,258,325)	(81,221)	(65,159)	(1,572)	(2,406,277)
Resegmentation	(75,858)	88	(3,141)	-	(78,911)
Impact of modifications	(86)	616	(2,971)	(7)	(2,448)
Write-offs	-	-	(36,568)	(70)	(36,638)
Recoveries of amounts previously written off	-	-	7,998	124	8,122
Unwind of discount	-	-	2,316	56	2,372
Currency translation differences	(15,785)	(1,998)	(2,369)	-	(20,152)
Foreign exchange movement	27,031	1,678	2,494	7	31,210
Net other changes	25,537	677	6,187	130	32,531
Balance at 31 December 2023	**3,709,870**	**191,530**	**168,425**	**3,197**	**4,073,022**
Individually assessed	-	-	29,131	-	29,131
Collectively assessed	3,709,870	191,530	139,294	3,197	4,043,891
Balance at 31 December 2023	**3,709,870**	**191,530**	**168,425**	**3,197**	**4,073,022**

Micro and SME loans at amortised cost, ECL:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2022	**20,066**	**5,448**	**37,317**	**659**	**63,490**
New financial asset originated or purchased	16,897	-	128	-	17,025
Transfer to Stage 1	4,627	(4,627)	-	-	-
Transfer to Stage 2	(5,665)	11,372	(5,707)	-	-
Transfer to Stage 3	(2,902)	(6,647)	9,549	-	-
Impact on ECL of exposures transferred between stages during the year	(754)	(4,692)	29,590	-	24,144
Assets repaid	(7,501)	(3,001)	(18,746)	(524)	(29,772)
Resegmentation	(1,093)	1,226	(868)	-	(735)
Impact of modifications	2	19	(1,241)	(7)	(1,227)
Foreign exchange movement	129	149	1,179	(1)	1,456
Net other measurement of ECL	(12,663)	6,463	30,543	596	24,939
Income statement (releases)/charges	(8,923)	262	44,427	64	35,830
Write-offs	-	-	(36,568)	(70)	(36,638)
Recoveries of amounts previously written off	-	-	7,998	124	8,122
Unwind of discount	-	-	2,316	56	2,372
Currency translation differences	(139)	(172)	(1,204)	-	(1,515)
Balance at 31 December 2023	**11,004**	**5,538**	**54,286**	**833**	**71,661**
Individually assessed	-	-	14,564	-	14,564
Collectively assessed	11,004	5,538	39,722	833	57,097
Balance at 31 December 2023	**11,004**	**5,538**	**54,286**	**833**	**71,661**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Consumer loans at amortised cost, gross:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2022	**3,243,192**	**213,875**	**121,992**	**22,995**	**3,602,054**
New financial asset originated or purchased	4,547,920	5,818	833	17,964	4,572,535
Transfer to Stage 1	289,459	(289,423)	(36)	-	-
Transfer to Stage 2	(473,300)	524,075	(50,775)	-	-
Transfer to Stage 3	(72,199)	(110,688)	182,887	-	-
Assets repaid	(3,179,954)	(107,858)	(69,753)	(12,030)	(3,369,595)
Resegmentation	(494)	(32)	517	-	(9)
Impact of modifications	699	(11)	(12,180)	(600)	(12,092)
Write-offs	-	-	(113,820)	(2,408)	(116,228)
Recoveries of amounts previously written off	-	-	25,870	1,376	27,246
Unwind of discount	-	-	4,199	530	4,729
Currency translation differences	(34,164)	(259)	(355)	-	(34,778)
Foreign exchange movement	5,109	65	524	89	5,787
Net other changes	(508)	(1,333)	21,566	595	20,320
Balance at 31 December 2023	**4,325,760**	**234,229**	**111,469**	**28,511**	**4,699,969**
Individually assessed	-	-	2,464	-	2,464
Collectively assessed	4,325,760	234,229	109,005	28,511	4,697,505
Balance at 31 December 2023	**4,325,760**	**234,229**	**111,469**	**28,511**	**4,699,969**

Consumer loans at amortised cost, ECL:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2022	**40,598**	**19,309**	**67,956**	**7,587**	**135,450**
New financial asset originated or purchased	128,968	702	380	-	130,050
Transfer to Stage 1	19,103	(19,094)	(9)	-	-
Transfer to Stage 2	(23,869)	54,205	(30,336)	-	-
Transfer to Stage 3	(49,393)	(21,319)	70,712	-	-
Impact on ECL of exposures transferred between stages during the year	(2,120)	(24,929)	26,592	-	(457)
Assets repaid	(41,913)	(8,393)	(41,821)	(4,886)	(97,013)
Resegmentation	(9)	(2)	(2)	-	(13)
Impact of modifications	13	(7)	(5,235)	(122)	(5,351)
Foreign exchange movement	13	4	34	(4)	47
Net other measurement of ECL	(29,175)	17,623	59,529	5,681	53,658
Income statement (releases)/charges	1,618	(1,210)	79,844	669	80,921
Write-offs	-	-	(113,820)	(2,408)	(116,228)
Recoveries of amounts previously written off	-	-	25,870	1,376	27,246
Unwind of discount	-	-	4,199	530	4,729
Currency translation differences	(269)	(55)	(161)	-	(485)
Balance at 31 December 2023	**41,947**	**18,044**	**63,888**	**7,754**	**131,633**
Individually assessed	-	-	1,062	-	1,062
Collectively assessed	41,947	18,044	62,826	7,754	130,571
Balance at 31 December 2023	**41,947**	**18,044**	**63,888**	**7,754**	**131,633**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Gold – pawn loans at amortised cost, gross:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2022	**147,525**	**8,613**	**8,416**	**-**	**164,554**
New financial asset originated or purchased	103,553	-	401	-	103,954
Transfer to Stage 1	11,660	(11,660)	-	-	-
Transfer to Stage 2	(16,775)	18,268	(1,493)	-	-
Transfer to Stage 3	(2,147)	(2,800)	4,947	-	-
Assets repaid	(106,379)	(3,676)	(2,124)	-	(112,179)
Resegmentation	-	-	(335)	-	(335)
Write-offs	-	-	(5,438)	-	(5,438)
Recoveries of amounts previously written off	-	-	(13)	-	(13)
Unwind of discount	-	-	549	-	549
Foreign exchange movement	(2)	(1)	(48)	-	(51)
Net other changes	(19)	(48)	(746)	-	(813)
Balance at 31 December 2023	**137,416**	**8,696**	**4,116**	**-**	**150,228**
Collectively assessed	137,416	8,696	4,116	-	150,228
Balance at 31 December 2023	**137,416**	**8,696**	**4,116**	**-**	**150,228**

Gold – pawn loans at amortised cost, ECL:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2022	**69**	**32**	**5,339**	**-**	**5,440**
Transfer to Stage 1	32	(32)	-	-	-
Transfer to Stage 2	(19)	184	(165)	-	-
Transfer to Stage 3	(2)	(8)	10	-	-
Impact on ECL of exposures transferred between stages during the year	-	(1)	-	-	(1)
Assets repaid	(24)	(8)	1,007	-	975
Net other measurement of ECL	(13)	(143)	33	-	(123)
Income statement (releases)/charges	(26)	(8)	885	-	851
Write-offs	-	-	(5,438)	-	(5,438)
Recoveries of amounts previously written off	-	-	(13)	-	(13)
Unwind of discount	-	-	549	-	549
Balance at 31 December 2023	**43**	**24**	**1,322**	**-**	**1,389**
Collectively assessed	43	24	1,322	-	1,389
Balance at 31 December 2023	**43**	**24**	**1,322**	**-**	**1,389**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Commercial loans at amortised cost, gross:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2021	**4,742,975**	**374,933**	**223,401**	**18,014**	**5,359,323**
New financial asset originated or purchased	4,489,689	34,779	693	6,969	4,532,130
Transfer to Stage 1	202,422	(202,422)	-	-	-
Transfer to Stage 2	(761,225)	791,522	(30,297)	-	-
Transfer to Stage 3	(5,553)	(98,586)	104,139	-	-
Assets repaid	(3,890,950)	(207,872)	(83,237)	(9,763)	(4,191,822)
Resegmentation	194,578	2,622	(6,567)	-	190,633
Impact of modifications	1,330	1,983	184	2	3,499
Write-offs	-	-	(55,962)	-	(55,962)
Recoveries of amounts previously written off	-	-	42,501	2,865	45,366
Unwind of discount	-	-	(1,921)	359	(1,562)
Currency translation differences	(36,086)	(1,051)	(1,888)	-	(39,025)
Foreign exchange movement	(505,333)	(89,055)	(24,019)	(1,843)	(620,250)
Net other changes	50,869	1,454	5,956	(653)	57,626
Balance at 31 December 2022	**4,482,716**	**608,307**	**172,983**	**15,950**	**5,279,956**
Individually assessed	-	-	155,882	13,603	169,485
Collectively assessed	4,482,716	608,307	17,101	2,347	5,110,471
Balance at 31 December 2022	**4,482,716**	**608,307**	**172,983**	**15,950**	**5,279,956**

Commercial loans at amortised cost, ECL:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2021	**12,858**	**6,893**	**133,426**	**2,926**	**156,103**
New financial asset originated or purchased	23,237	166	230	2,997	26,630
Transfer to Stage 1	4,323	(4,323)	-	-	-
Transfer to Stage 2	(6,165)	12,301	(6,136)	-	-
Transfer to Stage 3	(485)	(1,503)	1,988	-	-
Impact on ECL of exposures transferred between stages during the year	(2,382)	(3,448)	28,233	-	22,403
Assets repaid	(9,220)	(4,189)	(59,906)	(3,151)	(76,466)
Resegmentation	5,404	(27)	(997)	-	4,380
Impact of modifications	30	104	1	2	137
Foreign exchange movement	(871)	(1,696)	(10,614)	(883)	(14,064)
Net other measurement of ECL	(6,849)	20,270	(25,611)	(547)	(12,737)
Income statement (releases)/charges	7,022	17,655	(72,812)	(1,582)	(49,717)
Write-offs	-	-	(55,962)	-	(55,962)
Recoveries of amounts previously written off	-	-	42,501	2,865	45,366
Unwind of discount	-	-	(1,921)	359	(1,562)
Currency translation differences	(790)	(1,079)	(2,940)	(1)	(4,810)
Balance at 31 December 2022	**19,090**	**23,469**	**42,292**	**4,567**	**89,418**
Individually assessed	-	-	35,537	4,496	40,033
Collectively assessed	19,090	23,469	6,755	71	49,385
Balance at 31 December 2022	**19,090**	**23,469**	**42,292**	**4,567**	**89,418**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Residential mortgage loans at amortised cost, gross:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2021	**3,629,369**	**259,970**	**104,514**	**28,205**	**4,022,058**
New financial asset originated or purchased	1,466,957	14	-	13,524	1,480,495
Transfer to Stage 1	403,540	(403,398)	(142)	-	-
Transfer to Stage 2	(375,932)	443,567	(67,635)	-	-
Transfer to Stage 3	(45,171)	(49,817)	94,988	-	-
Assets repaid	(901,792)	(57,945)	(49,096)	(10,849)	(1,019,682)
Resegmentation	(603)	-	-	-	(603)
Impact of modifications	179	37	(2,949)	(169)	(2,902)
Write-offs	-	-	(4,445)	(730)	(5,175)
Recoveries of amounts previously written off	-	-	3,937	357	4,294
Unwind of discount	-	-	182	109	291
Currency translation differences	(4,670)	(98)	(23)	-	(4,791)
Foreign exchange movement	(254,899)	(20,553)	(10,022)	(2,527)	(288,001)
Net other changes	8,928	(2,211)	348	155	7,220
Balance at 31 December 2022	**3,925,906**	**169,566**	**69,657**	**28,075**	**4,193,204**
Individually assessed	-	-	2,940	-	2,940
Collectively assessed	3,925,906	169,566	66,717	28,075	4,190,264
Balance at 31 December 2022	**3,925,906**	**169,566**	**69,657**	**28,075**	**4,193,204**

Residential mortgage loans at amortised cost, ECL:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2021	**9,701**	**3,803**	**17,039**	**2,493**	**33,036**
New financial asset originated or purchased	14,452	-	-	2,403	16,855
Transfer to Stage 1	5,673	(5,608)	(65)	-	-
Transfer to Stage 2	(3,236)	15,977	(12,741)	-	-
Transfer to Stage 3	(7,463)	(1,484)	8,947	-	-
Impact on ECL of exposures transferred between stages during the year	(1,807)	(10,903)	6,767	-	(5,943)
Assets repaid	(1,731)	(961)	(11,220)	(2,103)	(16,015)
Impact of modifications	4	1	937	64	1,006
Foreign exchange movement	(244)	(122)	(1,652)	(498)	(2,516)
Net other measurement of ECL	(6,487)	1,898	6,399	2,412	4,222
Income statement (releases)/charges	(839)	(1,202)	(2,628)	2,278	(2,391)
Write-offs	-	-	(4,445)	(730)	(5,175)
Recoveries of amounts previously written off	-	-	3,937	357	4,294
Unwind of discount	-	-	182	109	291
Currency translation differences	(2)	-	-	-	(2)
Balance at 31 December 2022	**8,860**	**2,601**	**14,085**	**4,507**	**30,053**
Individually assessed	-	-	576	-	576
Collectively assessed	8,860	2,601	13,509	4,507	29,477
Balance at 31 December 2022	**8,860**	**2,601**	**14,085**	**4,507**	**30,053**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Micro and SME loans at amortised cost, gross:

	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2021	**3,276,167**	**293,473**	**151,499**	**6,635**	**3,727,774**
New financial asset originated or purchased	2,926,540	7,854	1,859	2,435	2,938,688
Transfer to Stage 1	337,049	(337,049)	-	-	-
Transfer to Stage 2	(441,995)	501,852	(59,857)	-	-
Transfer to Stage 3	(50,683)	(106,474)	157,157	-	-
Assets repaid	(2,116,730)	(125,805)	(71,105)	(5,917)	(2,319,557)
Resegmentation	(224,709)	(4,680)	5,034	-	(224,355)
Impact of modifications	194	139	(2,627)	(36)	(2,330)
Write-offs	-	-	(37,629)	(98)	(37,727)
Recoveries of amounts previously written off	-	-	11,875	79	11,954
Unwind of discount	-	-	1,262	58	1,320
Currency translation differences	(11,551)	(1,097)	(1,147)	-	(13,795)
Foreign exchange movement	(275,010)	(27,918)	(17,669)	(350)	(320,947)
Net other changes	51,417	168	7,865	38	59,488
Balance at 31 December 2022	**3,470,689**	**200,463**	**146,517**	**2,844**	**3,820,513**
Individually assessed	-	-	39,448	-	39,448
Collectively assessed	3,470,689	200,463	107,069	2,844	3,781,065
Balance at 31 December 2022	**3,470,689**	**200,463**	**146,517**	**2,844**	**3,820,513**

Micro and SME loans at amortised cost, ECL:

	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2021	**28,160**	**6,556**	**39,584**	**124**	**74,424**
New financial asset originated or purchased	38,841	81	97	281	39,300
Transfer to Stage 1	7,921	(7,921)	-	-	-
Transfer to Stage 2	(8,872)	20,801	(11,929)	-	-
Transfer to Stage 3	(8,295)	(7,503)	15,798	-	-
Impact on ECL of exposures transferred between stages during the year	(962)	(9,903)	29,077	-	18,212
Assets repaid	(13,592)	(3,065)	(24,514)	(496)	(41,667)
Resegmentation	(5,935)	(129)	541	-	(5,523)
Impact of modifications	10	(24)	(1,147)	16	(1,145)
Foreign exchange movement	(1,071)	(114)	(3,448)	(67)	(4,700)
Net other measurement of ECL	(15,996)	6,765	18,514	762	10,045
Income statement (releases)/charges	(7,951)	(1,012)	22,989	496	14,522
Write-offs	-	-	(37,629)	(98)	(37,727)
Recoveries of amounts previously written off	-	-	11,875	79	11,954
Unwind of discount	-	-	1,262	58	1,320
Currency translation differences	(143)	(96)	(764)	-	(1,003)
Balance at 31 December 2022	**20,066**	**5,448**	**37,317**	**659**	**63,490**
Individually assessed	-	-	10,552	-	10,552
Collectively assessed	20,066	5,448	26,765	659	52,938
Balance at 31 December 2022	**20,066**	**5,448**	**37,317**	**659**	**63,490**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Consumer loans at amortised cost, gross:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2021	**2,635,438**	**215,026**	**107,642**	**23,199**	**2,981,305**
New financial asset originated or purchased	3,313,393	7,566	969	15,493	3,337,421
Transfer to Stage 1	344,640	(344,445)	(195)	-	-
Transfer to Stage 2	(534,425)	608,146	(73,721)	-	-
Transfer to Stage 3	(121,557)	(167,897)	289,454	-	-
Assets repaid	(2,357,992)	(102,236)	(64,593)	(12,241)	(2,537,062)
Resegmentation	30,506	2,058	1,578	-	34,142
Impact of modifications	1,152	(84)	(24,515)	(1,236)	(24,683)
Write-offs	-	-	(171,142)	(4,431)	(175,573)
Recoveries of amounts previously written off	-	-	22,074	879	22,953
Unwind of discount	-	-	4,252	922	5,174
Currency translation differences	(14,539)	(80)	(163)	-	(14,782)
Foreign exchange movement	(86,830)	(4,100)	(1,319)	(611)	(92,860)
Net other changes	33,406	(79)	31,671	1,021	66,019
Balance at 31 December 2022	**3,243,192**	**213,875**	**121,992**	**22,995**	**3,602,054**
Individually assessed	-	-	2,650	(1)	2,649
Collectively assessed	3,243,192	213,875	119,342	22,996	3,599,405
Balance at 31 December 2022	**3,243,192**	**213,875**	**121,992**	**22,995**	**3,602,054**

Consumer loans at amortised cost, ECL:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2021	**57,083**	**19,410**	**58,731**	**811**	**136,035**
New financial asset originated or purchased	131,916	1,199	478	4,325	137,918
Transfer to Stage 1	26,886	(26,872)	(14)	-	-
Transfer to Stage 2	(36,429)	72,075	(35,646)	-	-
Transfer to Stage 3	(61,445)	(37,845)	99,290	-	-
Impact on ECL of exposures transferred between stages during the year	(3,821)	(29,191)	48,501	-	15,489
Assets repaid	(41,829)	(8,884)	(38,047)	(3,763)	(92,523)
Resegmentation	531	156	456	-	1,143
Impact of modifications	121	(12)	(10,792)	122	(10,561)
Foreign exchange movement	(191)	(60)	(763)	(63)	(1,077)
Net other measurement of ECL	(32,188)	29,344	90,779	8,785	96,720
Income statement (releases)/charges	(16,449)	(90)	154,242	9,406	147,109
Write-offs	-	-	(171,142)	(4,431)	(175,573)
Recoveries of amounts previously written off	-	-	22,074	879	22,953
Unwind of discount	-	-	4,252	922	5,174
Currency translation differences	(36)	(11)	(201)	-	(248)
Balance at 31 December 2022	**40,598**	**19,309**	**67,956**	**7,587**	**135,450**
Individually assessed	-	-	1,054	-	1,054
Collectively assessed	40,598	19,309	66,902	7,587	134,396
Balance at 31 December 2022	**40,598**	**19,309**	**67,956**	**7,587**	**135,450**

9. Loans to customers, factoring and finance lease receivables (continued)

Expected credit loss (continued)

Gold – pawn loans at amortised cost, gross:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2021	**152,787**	**10,116**	**2,514**	**-**	**165,417**
New financial asset originated or purchased	122,438	1	54	-	122,493
Transfer to Stage 1	17,460	(17,460)	-	-	-
Transfer to Stage 2	(24,040)	25,642	(1,602)	-	-
Transfer to Stage 3	(7,251)	(2,757)	10,008	-	-
Assets repaid	(112,603)	(6,938)	(4,054)	-	(123,595)
Resegmentation	228	-	(45)	-	183
Write-offs	-	-	(635)	-	(635)
Recoveries of amounts previously written off	-	-	(25)	-	(25)
Unwind of discount	-	-	1	-	1
Foreign exchange movement	(33)	(4)	4	-	(33)
Net other changes	(1,461)	13	2,196	-	748
Balance at 31 December 2022	**147,525**	**8,613**	**8,416**	**-**	**164,554**
Individually assessed	-	-	4,337	-	4,337
Collectively assessed	147,525	8,613	4,079	-	160,217
Balance at 31 December 2022	**147,525**	**8,613**	**8,416**	**-**	**164,554**

Gold – pawn loans at amortised cost, ECL:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2021	**1,822**	**11**	**241**	**-**	**2,074**
Transfer to Stage 1	27	(27)	-	-	-
Transfer to Stage 2	(16)	149	(133)	-	-
Transfer to Stage 3	(2,502)	(6)	2,508	-	-
Assets repaid	(18)	(6)	(30)	-	(54)
Net other measurement of ECL	756	(89)	3,412	-	4,079
Income statement (releases)/charges	(1,753)	21	5,757	-	4,025
Write-offs	-	-	(635)	-	(635)
Recoveries of amounts previously written off	-	-	(25)	-	(25)
Unwind of discount	-	-	1	-	1
Balance at 31 December 2022	**69**	**32**	**5,339**	**-**	**5,440**
Individually assessed	-	-	4,337	-	4,337
Collectively assessed	69	32	1,002	-	1,103
Balance at 31 December 2022	**69**	**32**	**5,339**	**-**	**5,440**

The contractual amounts outstanding on all loans to customers that have been written off during the reporting period but are still subject to enforcement activity was GEL 97,660 (2023: GEL 138,972, 2022: GEL 188,545).

9. Loans to customers, factoring and finance lease receivables (continued)

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, equipment and machinery, corporate shares, inventory, trade receivables, third-party corporate guarantees and personal guarantees of shareholders.
- For retail lending, mortgages over residential properties, cars, gold and jewellery, third-party corporate guarantees and personal guarantees of shareholders.

Management 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 expected credit loss/impairment of loans.

It is the Group's policy to dispose of repossessed properties in an orderly fashion or to hold them for capital appreciation or earning rentals, as appropriate in each case. In general, the Group does not occupy repossessed properties for business use.

Without taking into account the discounted value of collateral, the ECL for credit-impaired loans would be as follows:

2024	***ECL for credit-impaired loans***	***ECL without taking into account the discounted value of collateral***
Commercial loans	109,693	177,215
Residential mortgage loans	8,713	46,174
Micro and SME loans	62,497	165,347
Consumer loans	57,633	91,720
Gold – pawn loans	996	2,212
Total	**239,532**	**482,668**

2023	***ECL for credit-impaired loans***	***ECL without taking into account the discounted value of collateral***
Commercial loans	51,068	116,365
Residential mortgage loans	16,742	56,851
Micro and SME loans	55,119	152,430
Consumer loans	71,642	105,437
Gold – pawn loans	1,322	3,290
Total	**195,893**	**434,373**

2022	***ECL for credit-impaired loans***	***ECL without taking into account the discounted value of collateral***
Commercial loans	46,859	185,698
Residential mortgage loans	18,592	67,537
Micro and SME loans	37,976	131,404
Consumer loans	75,543	103,597
Gold – pawn loans	5,339	6,947
Total	**184,309**	**495,183**

Without taking into account the discounted value of collateral, the allowance for expected credit loss/impairment of loans would be GEL 243,136 higher as at 31 December 2024 (2023: GEL 238,480 higher, 2022: GEL 310,874 higher).

9. Loans to customers, factoring and finance lease receivables (continued)

Concentration of loans to customers

As at 31 December 2024, the concentration of loans granted by the Group to the ten largest third-party borrowers comprised GEL 1,622,915 accounting for 7% of the gross loan portfolio of the Group (2023: GEL 1,507,812 and 7% respectively, 2022: GEL 1,017,629 and 6% respectively). An allowance of expected credit loss of GEL 1,596 (2023: GEL 13,524, 2022: GEL 8,209) was established against these loans.

As at 31 December 2024, the concentration of loans granted by the Group to the ten largest third-party group of borrowers (borrower and its related parties) comprised GEL 2,823,628 accounting for 11% of the gross loan portfolio of the Group (2023: GEL 2,414,054 and 12% respectively, 2022: GEL 1,736,614 and 10% respectively). An allowance of GEL 3,667 (2023: GEL 3,599, 2022: GEL 17,392) was established against these loans.

As at 31 December 2024, 31 December 2023 and 31 December 2022, loans were principally issued within Georgia, and their distribution by industry sector was as follows:

	2024	*2023*	*2022*
Individuals	13,523,394	11,445,733	10,011,378
Real estate	2,462,948	1,608,487	1,024,364
Trade	1,769,292	1,422,273	1,119,739
Manufacturing	1,359,028	1,475,982	1,029,298
Electricity, gas and water supply	914,765	665,454	458,415
Hospitality	874,530	975,621	828,577
Agriculture	867,671	710,440	719,077
Financial intermediation	566,457	418,103	308,121
Service	495,904	306,465	302,442
Construction	410,076	377,857	512,345
Transport & communication	313,881	273,071	190,175
Mining and quarrying	152,050	160,261	144,799
Other	867,421	620,327	411,551
Loans to customers, gross	**24,577,417**	**20,460,074**	**17,060,281**
Less – Allowance for expected credit loss	(356,674)	(325,790)	(323,851)
Loans to customers, net	**24,220,743**	**20,134,284**	**16,736,430**

As at 31 December 2024, the amount of loans to customers for which no ECL has been recognised due to the existence of high-quality collateral was GEL 553,177 (2023: GEL 6,096,377 , 2022: GEL 5,227,783)

Finance lease receivables

	2024	*2023*	*2022*
Minimum lease payments receivable	97,070	86,839	114,850
Less – Unearned finance lease income	(28,072)	(16,748)	(24,108)
	68,998	**70,091**	**90,742**
Less – Allowance for expected credit loss / impairment loss	(9,754)	(11,208)	(8,698)
Finance lease receivables, net	**59,244**	**58,883**	**82,044**

The difference between the minimum lease payments to be received in the future and the finance lease receivables represents unearned finance income.

9. Loans to customers, factoring and finance lease receivables (continued)

Finance lease receivables (continued)

As at 31 December 2024 and 31 December 2023 no finance lease receivables were pledged for inter-bank loans received (2022: GEL 16,965).

As at 31 December 2024, the concentration of investment in the five largest lease receivables comprised GEL 14,112 or 20% of total finance lease receivables (2023: GEL 18,436 or 25%, 2022: GEL 20,273 or 21%) and finance income received from them for the year ended 31 December 2024 comprised GEL 2,123 or 23% of total finance income from lease (2023: GEL 2,857 or 20%, 2022: GEL 793 or 4%).

Future minimum lease payments to be received after 31 December 2024, 31 December 2023 and 31 December 2022 are as follows:

	2024	*2023*	*2022*
Within 1 year	56,247	46,531	49,228
From 1 to 2 years	7,203	9,203	21,711
From 2 to 3 years	9,776	7,288	17,123
From 3 to 4 years	1,925	1,894	7,037
From 4 to 5 years	4,120	2,913	2,727
More than 5 years	17,799	19,010	17,025
Minimum lease payment receivables	**97,070**	**86,839**	**114,850**

Movements of the gross finance lease receivables and respective allowance for expected credit loss/impairment of finance lease receivables are as follows:

Finance lease receivables, gross	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2023	**33,899**	**5,048**	**12,064**	**19,080**	**70,091**
New financial asset originated or purchased	28,652	-	-	6,578	35,230
Transfer to Stage 1	1,994	(1,867)	(127)	-	-
Transfer to Stage 2	(4,109)	4,418	(309)	-	-
Transfer to Stage 3	(179)	(3,732)	3,911	-	-
Assets repaid	(23,975)	(3,119)	(5,988)	(8,642)	(41,724)
Impact of modifications	(13)	-	-	-	(13)
Write-offs	-	-	(1,845)	-	(1,845)
Recoveries of amounts previously written off	-	-	1	405	406
Unwind of discount	-	-	30	(67)	(37)
Currency translation differences	1,833	72	(51)	(1)	1,853
Foreign exchange movement	1,165	26	(33)	(424)	734
Net other changes	3,751	109	175	268	4,303
Balance at 31 December 2024	**43,018**	**955**	**7,828**	**17,197**	**68,998**
Individually assessed	-	-	962	-	962
Collectively assessed	43,018	955	6,866	17,197	68,036
Balance at 31 December 2024	**43,018**	**955**	**7,828**	**17,197**	**68,998**

Finance lease receivables, ECL:	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Balance at 31 December 2023	**1,169**	**484**	**5,706**	**3,849**	**11,208**
New financial asset originated or purchased	299	-	-	-	299
Transfer to Stage 1	67	(61)	(6)	-	-
Transfer to Stage 2	(86)	90	(4)	-	-
Transfer to Stage 3	(4)	(485)	489	-	-
Impact on ECL of exposures transferred between stages during the year	(53)	191	322	-	460
Assets repaid	(83)	(149)	(1,631)	(3,238)	(5,101)
Foreign exchange movement	11	(2)	15	-	24
Net other measurement of ECL	(153)	97	2,540	779	3,263
Income statement (releases)/charges	(2)	(319)	1,725	(2,459)	(1,055)
Recoveries of amounts previously written off	(851)	-	1	405	(445)
Unwind of discount	-	-	30	(67)	(37)
Currency translation differences	21	11	51	-	83
Balance at 31 December 2024	**337**	**176**	**7,513**	**1,728**	**9,754**
Individually assessed	-	-	645	-	645
Collectively assessed	337	176	6,868	1,728	9,109
Balance at 31 December 2024	**337**	**176**	**7,513**	**1,728**	**9,754**

9. Loans to customers, factoring and finance lease receivables (continued)

Finance lease receivables (continued)

Finance lease receivables, gross	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2022	**54,971**	**6,451**	**14,110**	**15,210**	**90,742**
New financial asset originated or purchased	24,001	-	-	10,525	34,526
Transfer to Stage 1	9,296	(8,702)	(594)	-	-
Transfer to Stage 2	(17,016)	21,008	(3,992)	-	-
Transfer to Stage 3	(1,291)	(10,139)	11,430	-	-
Assets repaid	(32,717)	(3,377)	(5,056)	(6,389)	(47,539)
Impact of modifications	(221)	-	138	-	(83)
Write-offs	-	-	(3,429)	313	(3,116)
Recoveries of amounts previously written off	-	-	66	-	66
Unwind of discount	-	-	23	284	307
Currency translation differences	(6,401)	(389)	(601)	-	(7,391)
Foreign exchange movement	2,285	198	117	(804)	1,796
Net other changes	992	(2)	(148)	(59)	783
Balance at 31 December 2023	**33,899**	**5,048**	**12,064**	**19,080**	**70,091**
Individually assessed	-	-	286	-	286
Collectively assessed	33,899	5,048	11,778	19,080	69,805
Balance at 31 December 2023	**33,899**	**5,048**	**12,064**	**19,080**	**70,091**

Finance lease receivables, ECL:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2022	**818**	**258**	**3,541**	**4,081**	**8,698**
New financial asset originated or purchased	964	-	-	-	964
Transfer to Stage 1	275	(262)	(13)	-	-
Transfer to Stage 2	(650)	769	(119)	-	-
Transfer to Stage 3	(236)	(434)	670	-	-
Impact on ECL of exposures transferred between stages during the year	(142)	234	291	-	383
Assets repaid	(538)	(170)	(2,816)	(2,394)	(5,918)
Impact of modifications	(2)	-	-	-	(2)
Foreign exchange movement	51	37	3	-	91
Net other measurement of ECL	425	(53)	5,307	1,565	7,244
Income statement (releases)/charges	147	121	3,323	(829)	2,762
Write-offs	-	-	(316)	313	(3)
Recoveries of amounts previously written off	-	-	66	-	66
Unwind of discount	-	-	23	284	307
Currency translation differences	204	105	(931)	-	(622)
Balance at 31 December 2023	**1,169**	**484**	**5,706**	**3,849**	**11,208**
Individually assessed	-	-	60	-	60
Collectively assessed	1,169	484	5,646	3,849	11,148
Balance at 31 December 2023	**1,169**	**484**	**5,706**	**3,849**	**11,208**

9. Loans to customers, factoring and finance lease receivables (continued)

Finance lease receivables (continued)

Finance lease receivables, gross	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2021	**73,181**	**17,559**	**16,447**	**9,582**	**116,769**
New financial asset originated or purchased	43,731	-	-	12,081	55,812
Transfer to Stage 1	23,502	(18,121)	(5,381)	-	-
Transfer to Stage 2	(24,194)	31,532	(7,338)	-	-
Transfer to Stage 3	(3,093)	(15,782)	18,875	-	-
Assets repaid	(54,166)	(7,662)	(5,148)	(6,537)	(73,513)
Impact of modifications	278	-	-	-	278
Write-offs	-	-	(2,724)	-	(2,724)
Unwind of discount	-	-	105	-	105
Currency translation differences	(5,461)	(1,020)	(1,024)	-	(7,505)
Foreign exchange movement	865	(66)	86	-	885
Net other changes	328	11	212	84	635
Balance at 31 December 2022	**54,971**	**6,451**	**14,110**	**15,210**	**90,742**
Individually assessed	-	-	1,199	-	1,199
Collectively assessed	54,971	6,451	12,911	15,210	89,543
Balance at 31 December 2022	**54,971**	**6,451**	**14,110**	**15,210**	**90,742**

Finance lease receivables, ECL:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2021	**1,031**	**762**	**2,686**	**1,196**	**5,675**
New financial asset originated or purchased	793	-	-	-	793
Transfer to Stage 1	1,322	(680)	(642)	-	-
Transfer to Stage 2	(537)	1,309	(772)	-	-
Transfer to Stage 3	(151)	(1,253)	1,404	-	-
Impact on ECL of exposures transferred between stages during the year	(1,284)	276	2,093	-	1,085
Assets repaid	(569)	(192)	(1,559)	(1,856)	(4,176)
Foreign exchange movement	64	(3)	5	-	66
Net other measurement of ECL	70	56	573	4,741	5,440
Income statement (releases)/charges	(292)	(487)	1,102	2,885	3,208
Write-offs	-	-	(480)	-	(480)
Unwind of discount	-	-	105	-	105
Currency translation differences	79	(17)	128	-	190
Balance at 31 December 2022	**818**	**258**	**3,541**	**4,081**	**8,698**
Individually assessed	-	-	306	-	306
Collectively assessed	818	258	3,235	4,081	8,392
Balance at 31 December 2022	**818**	**258**	**3,541**	**4,081**	**8,698**

The Group writes off the finance lease receivable balance when it takes possession of the underlying asset. The difference between the gross and ECL balances at the time of write-off represents the value of the repossessed asset.

Factoring Receivables

	2024	*2023*	*2022*
Factoring receivables, gross	**36,180**	**55,027**	**23,411**
Less – Allowance for expected credit loss	(12)	(127)	(282)
Factoring receivables, net	**36,168**	**54,900**	**23,129**

9. Loans to customers, factoring and finance lease receivables (continued)

Factoring receivables (continued)

Factoring receivables, gross

	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2023	**54,749**	**180**	**98**	**-**	**55,027**
New financial asset originated or purchased	47,606	-	-	-	47,606
Transfer to Stage 2	(1,926)	1,926	-	-	-
Transfer to Stage 3	(205)	(147)	352	-	-
Assets repaid	(64,697)	(513)	(422)	-	(65,632)
Currency translation differences	133	7	3	-	143
Foreign exchange movement	406	-	-	-	406
Net other changes	-	(1,371)	1	-	(1,370)
Balance at 31 December 2024	**36,066**	**82**	**32**	**-**	**36,180**
Collectively assessed	36,066	82	32	-	36,180
Balance at 31 December 2024	**36,066**	**82**	**32**	**-**	**36,180**

Factoring receivables, ECL:

	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2023	**28**	**1**	**98**	**-**	**127**
New financial asset originated or purchased	243	-	-	-	243
Transfer to Stage 2	(32)	32	-	-	-
Transfer to Stage 3	(205)	-	205	-	-
Assets repaid	(28)	(1)	(241)	-	(270)
Net other measurement of ECL	11	(31)	36	-	16
Income statement (releases)/charges	(11)	-	-	-	(11)
Currency translation differences	(5)	(1)	(98)	-	(104)
Balance at 31 December 2024	**12**	**-**	**-**	**-**	**12**
Collectively assessed	12	-	-	-	12
Balance at 31 December 2024	**12**	**-**	**-**	**-**	**12**

Factoring receivables, gross

	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2022	**20,365**	**3,000**	**46**	**-**	**23,411**
New financial asset originated or purchased	89,935	-	-	-	89,935
Transfer to Stage 2	(765)	765	-	-	-
Transfer to Stage 3	(306)	(2)	308	-	-
Assets repaid	(53,456)	(3,546)	(231)	-	(57,233)
Currency translation differences	(1,019)	(37)	(25)	-	(1,081)
Net other changes	(5)	-	-	-	(5)
Balance at 31 December 2023	**54,749**	**180**	**98**	**-**	**55,027**
Individually assessed	-	-	98	-	98
Collectively assessed	54,749	180	-	-	54,929
Balance at 31 December 2023	**54,749**	**180**	**98**	**-**	**55,027**

Factoring receivables, ECL:

	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2022	**175**	**61**	**46**	**-**	**282**
New financial asset originated or purchased	411	-	-	-	411
Transfer to Stage 2	(13)	13	-	-	-
Transfer to Stage 3	(306)	-	306	-	-
Impact on ECL of exposures transferred between stages during the year	-	4	1	-	5
Assets repaid	(245)	(75)	(307)	-	(627)
Net other measurement of ECL	32	(3)	-	-	29
Income statement (releases)/charges	(121)	(61)	-	-	(182)
Currency translation differences	(26)	1	52	-	27
Balance at 31 December 2023	**28**	**1**	**98**	**-**	**127**
Individually assessed	-	-	98	-	98
Collectively assessed	28	1	-	-	29
Balance at 31 December 2023	**28**	**1**	**98**	**-**	**127**

9. Loans to customers, factoring and finance lease receivables (continued)

Factoring receivables (continued)

Factoring receivables, gross	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2021	**33,048**	**25**	**165**	**-**	**33,238**
New financial asset originated or purchased	116,579	-	-	-	116,579
Transfer to Stage 1	1,680	(1,680)	-	-	-
Transfer to Stage 2	(14,310)	14,310	-	-	-
Transfer to Stage 3	(46)	-	46	-	-
Assets repaid	(115,785)	(9,652)	(151)	-	(125,588)
Currency translation differences	(812)	(2)	(15)	-	(829)
Foreign exchange movement	-	-	-	-	-
Net other changes	11	(1)	1	-	11
Balance at 31 December 2022	**20,365**	**3,000**	**46**	**-**	**23,411**
Individually assessed	-	-	46	-	46
Collectively assessed	20,365	3,000	-	-	23,365
Balance at 31 December 2022	**20,365**	**3,000**	**46**	**-**	**23,411**

Factoring receivables, ECL:	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 31 December 2021	**246**	**1**	**124**	**-**	**371**
New financial asset originated or purchased	744	-	-	-	744
Transfer to Stage 1	364	(364)	-	-	-
Transfer to Stage 2	(712)	712	-	-	-
Transfer to Stage 3	(37)	-	37	-	-
Impact on ECL of exposures transferred between stages during the year	(229)	310	11	-	92
Assets repaid	(481)	(243)	(86)	-	(810)
Net other measurement of ECL	341	(354)	38	-	25
Income statement (releases)/charges	(10)	61	-	-	51
Currency translation differences	(61)	(1)	(78)	-	(140)
Balance at 31 December 2022	**175**	**61**	**46**	**-**	**282**
Individually assessed	-	-	46	-	46
Collectively assessed	175	61	-	-	236
Balance at 31 December 2022	**175**	**61**	**46**	**-**	**282**

10. Right-of-use assets, lease liabilities, property and equipment, and intangible assets

	2024	*2023*	*2022*
Right-of-use assets	163,104	134,422	115,404
Lease liability	177,365	137,554	112,624

Administrative expenses include occupancy and rent expenses on lease contracts where the recognition exemptions have been applied:

	2024	*2023*	*2022*
Short-term leases	(4,323)	(4,601)	(4,413)
Leases of low-value assets	(1,519)	(1,665)	(1,385)
	(5,842)	**(6,266)**	**(5,798)**

	Movements in lease liabilities
Carrying amount at 1 January 2022	**85,098**
Cash payments for the principal portion of the lease liability	(25,020)
Change in accrued interest	1,089
Additions	70,095
Other movements*	(18,638)
Carrying amount at 31 December 2022	**112,624**
Cash payments for the principal portion of the lease liability	(31,606)
Change in accrued interest	(743)
Additions	59,709
Other movements*	(2,430)
Carrying amount at 31 December 2023	**137,554**
Cash payments for the principal portion of the lease liability	(36,340)
Change in accrued interest	677
Additions	67,873
Other movements*	7,601
Carrying amount at 31 December 2024	**177,365**

**Other movement mainly includes translation effect of foreign currency contracts and cancelled lease contracts.*

10. Right-of-use assets, lease liabilities, property and equipment, and intangible assets (continued)

The movements in right-of-use assets were as follows:

	Office buildings & service centres	*Computers & equipment*	*Total*
Cost			
31 December 2023	**217,675**	**1,774**	**219,449**
Additions	66,766	-	66,766
Disposals	(14,783)	-	(14,783)
Currency translation differences	977	94	1,071
31 December 2024	**270,635**	**1,868**	**272,503**
Accumulated depreciation			
31 December 2023	**83,928**	**1,099**	**85,027**
Depreciation charge	35,818	267	36,085
Disposals	(12,078)	-	(12,078)
Currency translation differences	299	66	365
31 December 2024	**107,967**	**1,432**	**109,399**
Net book value			
31 December 2023	**133,747**	**675**	**134,422**
31 December 2024	**162,668**	**436**	**163,104**

	Office buildings & service centres	*Computers & equipment*	*Total*
Cost			
31 December 2022	**177,533**	**2,333**	**179,866**
Additions	59,974	-	59,974
Disposals	(14,548)	-	(14,548)
Currency translation differences	(5,284)	(559)	(5,843)
31 December 2023	**217,675**	**1,774**	**219,449**
Accumulated depreciation			
31 December 2022	**63,362**	**1,100**	**64,462**
Depreciation charge	31,782	315	32,097
Disposals	(10,164)	-	(10,164)
Currency translation differences	(1,052)	(316)	(1,368)
31 December 2023	**83,928**	**1,099**	**85,027**
Net book value			
31 December 2022	**114,171**	**1,233**	**115,404**
31 December 2023	**133,747**	**675**	**134,422**

10. Right-of-use assets, lease liabilities, property and equipment, and intangible assets (continued)

	Office buildings & service centres	*Computers & equipment*	*Total*
Cost			
31 December 2021	**123,669**	**2,631**	**126,300**
Additions	73,773	-	73,773
Disposals	(18,960)	-	(18,960)
Currency translation differences	(949)	(298)	(1,247)
31 December 2022	**177,533**	**2,333**	**179,866**
Accumulated depreciation			
31 December 2021	**47,760**	**864**	**48,624**
Depreciation charge	24,473	345	24,818
Disposals	(8,656)	-	(8,656)
Currency translation differences	(215)	(109)	(324)
31 December 2022	**63,362**	**1,100**	**64,462**
Net book value			
31 December 2021	**75,909**	**1,767**	**77,676**
31 December 2022	**114,171**	**1,233**	**115,404**

The movements in property and equipment were as follows:

	Office buildings & service centres	*Furniture & fixtures*	*Computers & equipment*	*Motor vehicles*	*Leasehold improvements*	*Assets under construction*	*Total*
Cost							
31 December 2023	251,904	**213,526**	**234,269**	**8,032**	**33,811**	**6,480**	**748,022**
Additions	6,532	27,891	30,472	4,589	416	27,617	97,517
Transfers	4,671	(1,225)	1,368	-	14,535	(19,349)	-
Revaluation	1,144	-	-	-	-	-	1,144
Transfers to investment properties	(9,669)	-	-	-	-	-	(9,669)
Transfers from assets held for sale	927	-	-	-	-	-	927
Transfers to other assets	(281)	(1,953)	(9,846)	-	-	(2,016)	(14,096)
Disposals	-	(213)	(108)	(25)	(53)	-	(399)
Write-offs	(1,342)	(11)	(56)	(107)	(2,392)	-	(3,908)
Currency translation differences	549	89	442	25	104	29	1,238
31 December 2024	**254,435**	**238,104**	**256,541**	**12,514**	**46,421**	**12,761**	**820,776**
Accumulated impairment							
31 December 2023	**2,557**	**36**	**98**	**8**	**-**	**-**	**2,699**
Currency translation differences	(290)	(24)	(82)	(8)	-	-	(404)
31 December 2024	**2,267**	**12**	**16**	**-**	**-**	**-**	**2,295**
Accumulated depreciation							
31 December 2023	**32,277**	**129,561**	**160,103**	**4,041**	**15,038**	**-**	**341,020**
Depreciation charge	4,979	12,608	24,130	1,534	6,611	-	49,862
Transfers	-	(970)	970	-	-	-	-
Transfers to investment properties	(2,037)	-	-	-	-	-	(2,037)
Transfers to other assets	-	(1,230)	(7,712)	-	-	-	(8,942)
Disposals	-	(210)	(100)	(26)	(49)	-	(385)
Write-offs	(276)	(134)	(814)	(85)	(2,053)	-	(3,362)
Currency translation differences	649	20	208	7	42	-	926
31 December 2024	**35,592**	**139,645**	**176,785**	**5,471**	**19,589**	**-**	**377,082**
Net book value							
31 December 2023	**217,070**	**83,929**	**74,068**	**3,983**	**18,773**	**6,480**	**404,303**
31 December 2024	**216,576**	**98,447**	**79,740**	**7,043**	**26,832**	**12,761**	**441,399**

10. Right-of-use assets, lease liabilities, property and equipment, and intangible assets (continued)

	Office buildings & service centres	*Furniture & fixtures*	*Computers & equipment*	*Motor vehicles*	*Leasehold improvements*	*Assets under construction*	*Total*
Cost							
31 December 2022	**229,184**	**190,730**	**219,231**	**6,063**	**26,574**	**1,346**	**673,128**
Additions	20,379	24,936	25,362	2,795	1,544	16,793	91,809
Transfers	2,557	-	-	-	8,507	(11,064)	-
Transfers to investment properties	(641)	-	-	-	-	-	(641)
Transfers to assets held for sale	(1,363)	-	-	-	-	-	(1,363)
Transfers from foredosed Assets	3,516	-	-	-	-	-	3,516
Transfers (to) from other assets	934	(1,421)	(7,714)	(207)	(29)	(243)	(8,680)
Disposals	-	(267)	(480)	(194)	(222)	-	(1,163)
Write-offs	-	-	(2)	(284)	(2,161)	(318)	(2,765)
Currency translation differences	(2,662)	(452)	(2,128)	(141)	(402)	(34)	(5,819)
31 December 2023	**251,904**	**213,526**	**234,269**	**8,032**	**33,811**	**6,480**	**748,022**
Accumulated impairment							
31 December 2022	**2,557**	**36**	**98**	**8**	**-**	**-**	**2,699**
31 December 2023	**2,557**	**36**	**98**	**8**	**-**	**-**	**2,699**
Accumulated depreciation							
31 December 2022	**29,859**	**119,721**	**141,695**	**3,556**	**11,992**	**-**	**306,823**
Depreciation charge	4,947	11,583	26,109	910	4,576	-	48,125
Transfers to investment properties	(225)	(1)	-	-	-	-	(226)
Transfers to assets held for sale	(1,065)	-	-	-	-	-	(1,065)
Transfers to other assets	-	(996)	(5,526)	(203)	-	-	(6,725)
Disposals	-	(194)	(445)	(112)	(217)	-	(968)
Write-offs	-	(354)	(745)	(85)	(1,147)	-	(2,331)
Currency translation differences	(1,239)	(198)	(985)	(25)	(166)	-	(2,613)
31 December 2023	**32,277**	**129,561**	**160,103**	**4,041**	**15,038**	**-**	**341,020**
Net book value							
31 December 2022	**196,768**	**70,973**	**77,438**	**2,499**	**14,582**	**1,346**	**363,606**
31 December 2023	**217,070**	**83,929**	**74,068**	**3,983**	**18,773**	**6,480**	**404,303**

	Office buildings & service centres	*Furniture & fixtures*	*Computers & equipment*	*Motor vehicles*	*Leasehold improvements*	*Assets under construction*	*Total*
Cost							
31 December 2021	**210,883**	**186,683**	**194,705**	**5,029**	**26,863**	**1,095**	**625,258**
Additions	120	10,566	30,290	1,952	72	27,736	70,736
Transfers	23,333	32	77	-	3,804	(27,246)	-
Transfers from investment properties	769	-	-	-	-	-	769
Transfers to other assets	-	(1,571)	(2,135)	(265)	-	(231)	(4,202)
Disposals	(3,011)	(83)	(439)	(365)	(27)	(1)	(3,926)
Write-offs	(29)	(4,699)	(2,455)	(241)	(4,051)	-	(11,475)
Currency translation differences	(2,881)	(198)	(812)	(47)	(87)	(7)	(4,032)
31 December 2022	**229,184**	**190,730**	**219,231**	**6,063**	**26,574**	**1,346**	**673,128**
Accumulated impairment							
31 December 2021	**2,557**	**36**	**98**	**8**	**-**	**-**	**2,699**
31 December 2022	**2,557**	**36**	**98**	**8**	**-**	**-**	**2,699**
Accumulated depreciation							
31 December 2021	**27,512**	**111,842**	**124,814**	**3,381**	**11,985**	**-**	**279,534**
Depreciation charge	4,159	13,618	22,606	643	4,130	-	45,156
Transfers	(13)	13	-	-	-	-	-
Transfers to investment properties	(155)	-	-	-	-	-	(155)
Transfers to other assets	-	(916)	(2,479)	(230)	-	-	(3,625)
Disposals	(795)	(176)	(366)	(88)	(25)	-	(1,450)
Write-offs	2	(4,546)	(2,414)	(130)	(4,027)	-	(11,115)
Currency translation differences	(851)	(114)	(466)	(20)	(71)	-	(1,522)
31 December 2022	**29,859**	**119,721**	**141,695**	**3,556**	**11,992**	**-**	**306,823**
Net book value							
31 December 2021	**180,814**	**74,805**	**69,793**	**1,640**	**14,878**	**1,095**	**343,025**
31 December 2022	**196,768**	**70,973**	**77,438**	**2,499**	**14,582**	**1,346**	**363,606**

10. Right-of-use assets, lease liabilities, property and equipment, and intangible assets (continued)

The movements in intangible assets were as follows:

	Software and licence	*Other*	*Total*
Cost			
31 December 2023	**248,157**	**26,253**	**274,410**
Additions	59,478	196	59,674
Disposals	(6,397)	-	(6,397)
Currency translation differences	1,020	-	1,020
31 December 2024	**302,258**	**26,449**	**328,707**
Accumulated impairment			
31 December 2023	**2,201**	**-**	**2,201**
31 December 2024	**2,201**	**-**	**2,201**
Accumulated amortisation			
31 December 2023	**122,399**	**5,453**	**127,852**
Amortisation charge	32,178	19	32,197
Disposals	(6,233)	-	(6,233)
Currency translation differences	323	-	323
31 December 2024	**148,667**	**5,472**	**154,139**
Net book value			
31 December 2023	**123,557**	**20,800**	**144,357**
31 December 2024	**151,390**	**20,977**	**172,367**

	Software and licence	*Other*	*Total*
Cost			
31 December 2022	**212,765**	**26,253**	**239,018**
Additions	47,926	-	47,926
Disposals	(8,320)	-	(8,320)
Currency translation differences	(4,214)	-	(4,214)
31 December 2023	**248,157**	**26,253**	**274,410**
Accumulated impairment			
31 December 2022	**-**	**-**	**-**
Impairment charge	2,201	**-**	2,201
31 December 2023	**2,201**	**-**	**2,201**
Accumulated amortisation			
31 December 2022	**103,273**	**5,438**	**108,711**
Amortisation charge	28,302	15	28,317
Disposals	(7,814)	-	(7,814)
Write-offs	(4)	-	(4)
Currency translation differences	(1,358)	-	(1,358)
31 December 2023	**122,399**	**5,453**	**127,852**
Net book value			
31 December 2022	**109,492**	**20,815**	**130,307**
31 December 2023	**123,557**	**20,800**	**144,357**

10. Right-of-use assets, lease liabilities, property and equipment, and intangible assets (continued)

	Software and licence	*Other*	*Total*
Cost			
31 December 2021	**187,760**	**26,254**	**214,014**
Additions	34,124	-	34,124
Disposals	(7,330)	-	(7,330)
Write-offs	(376)	(1)	(377)
Currency translation differences	(1,413)	-	(1,413)
31 December 2022	**212,765**	**26,253**	**239,018**
Accumulated amortisation			
31 December 2021	**83,820**	**5,419**	**89,239**
Amortisation charge	25,983	20	26,003
Disposals	(5,683)	-	(5,683)
Write-offs	(377)	(1)	(378)
Currency translation differences	(470)	-	(470)
31 December 2022	**103,273**	**5,438**	**108,711**
Net book value			
31 December 2021	**103,940**	**20,835**	**124,775**
31 December 2022	**109,492**	**20,815**	**130,307**

11. Investment properties

	2024	*2023*	*2022*
At 1 January	**127,924**	**170,629**	**231,707**
Additions	-	4,882	5,845
Disposals	(20,246)	(38,175)	(54,713)
Net gains (losses) from revaluation of investment	21,595	579	6,645
Transfers to assets held for sale	(2,069)	(10,756)	(16,955)
Transfers from (to) property and equipment	7,632	415	(924)
Transfers from foredosed assets	5,346	3,428	-
Currency translation differences	555	(3,078)	(976)
At 31 December	**140,737**	**127,924**	**170,629**

Investment properties are stated at fair value. The fair value represents the price that would be received to sell an asset in an orderly transaction between market participants at the measurement date. As at 31 December 2024, the fair values of the properties are based on valuations performed by accredited independent valuers. Refer to Note 28 for details on fair value measurements of investment properties.

12. Foreclosed Assets

	2024	*2023*	*2022*
At 1 January	**271,712**	**119,924**	**3,216**
Additions	176,310	239,872	128,170
Disposals	(66,528)	(77,324)	(8,063)
Write-down	(3,019)	(2,114)	(3,399)
Transfers to property and equipment	(673)	(3,516)	-
Transfers to Investment property	(5,359)	(3,428)	-
Currency translation differences	134	(1,702)	-
At 31 December	**372,577**	**271,712**	**119,924**

Majority of the Group's foreclosed assets consist of the real estate assets repossessed during recovery of defaulted loans As at 31 December 2024, the carrying value of foreclosed assets subjected to the repurchase option was GEL 187,756 (2023: GEL 157,507; 2022: GEL 27,798).

13. Goodwill

Movements in goodwill were as follows:

	2024	*2023*	*2022*
Cost			
1 January	**57,209**	**57,209**	**57,209**
At 31 December	**57,209**	**57,209**	**57,209**
Accumulated impairment			
1 January	**23,756**	**23,756**	**23,756**
At 31 December	**23,756**	**23,756**	**23,756**
Net book value:			
1 January	**33,453**	**33,453**	**33,453**
At 31 December	**33,453**	**33,453**	**33,453**

Impairment test for goodwill

Goodwill acquired through business combinations with indefinite lives have been allocated to two individual cash-generating units (CGUs), for impairment testing: Corporate Banking and Retail Banking in Georgian Financial Services business division.

The carrying amount of goodwill allocated to each of the CGUs is as follows:

	2024	*2023*	*2022*
Retail Banking	23,488	23,488	23,488
Corporate Banking	9,965	9,965	9,965
Total	**33,453**	**33,453**	**33,453**

Key assumptions used in value-in-use calculations

The recoverable amounts of the CGUs have been determined based on a value-in-use calculation, using cash flow projections based on financial budgets approved by senior management covering a one to three-year period. Discount rates were not adjusted for either a constant or a declining growth rate beyond the three-year periods covered in financial budgets. For the purposes of the impairment test, a 3% permanent growth rate has been assumed when assessing the future operating cash flows of the CGU beyond the three-year period covered in financial budgets.

The following discount rates were used by the Group for Corporate Banking and Retail Banking:

	Corporate Banking			*Retail Banking*		
	2024, %	*2023, %*	*2022, %*	*2024, %*	*2023, %*	*2022, %*
Discount rate	6.8%	5.3%	4.3%	6.2%	6.6%	8.4%

Discount rates

Discount rates reflect management's estimate of return required in each business. This is the benchmark used by management to assess operating performance and to evaluate future investment proposals. Discount rates are calculated by using pre-tax weighted average cost of capital ("WACC").

For the Retail banking and Corporate Banking CGUs, the following additional assumptions were made:

- stable, business as usual growth of loans and deposits;
- no material changes in cost / income structure or ratio; and
- stable, business as usual growth of trade finance and other documentary businesses.

Sensitivity to changes in assumptions

Management believes that reasonable possible changes to key assumptions used to determine the recoverable amount for each CGU will not result in an impairment of goodwill. The excess of value-in-use over carrying value is determined by reference to the net book value as at 31 December 2024. Possible change was taken as +/-3% in discount rate and growth rate.

14. Taxation

The corporate income tax expense in income statement comprises:

	2024	*2023*	*2022*
Current income benefit (expense)	(283,148)	(324,449)	(137,386)
Deferred income tax benefit (expense)	(6,425)	65,481	(53,221)
Income tax expense	**(289,573)**	**(258,968)**	**(190,607)**

The income tax rate applicable to most of the Group's income is the income tax rate applicable to subsidiaries' income, which ranges from 15% to 25% (2023: from 15% to 25%, 2022: from 15% to 25%).

On 16 December 2022, an amendment to the Georgian corporate tax code was passed into law abolishing the expected transition to taxation on distributed earnings from 1 January 2023. According to the amendment, which became effective from 1 January 2023, existing taxation rules for financial institutions, including banks, are to be maintained. At the same time, the existing corporate tax rate for banks increased from 15% to 20% from 2023 going forward. In addition, with effect from 2023, taxable interest income and deductible ECLs on loans to customers were defined as per IFRS, instead of local NBG regulations. Transition differences in ECLs and interest income were taxed one-off at 15% and 20% respectively.

The change had an immediate impact on deferred tax asset and deferred tax liability balances attributable to previously recognised temporary differences arising from prior periods. As at 31 December 2022, deferred tax assets and liabilities balances were re-measured, in line with the updated legislation. The change resulted in material one-off deferred tax charge as previously the Bank recognised deferred taxes only to the extent they were expected to realise before 1 January 2023.

The effective income tax rate differs from the statutory income tax rates. As at 31 December 2024, 31 December 2023 and 31 December 2022**,** a reconciliation of the income tax expense based on statutory rates with the actual expense is as follows:

	2024	*2023*	*2022*
Profit before income tax expense	**2,127,472**	**1,592,687**	**1,182,611**
Statutory tax rate in Georgia	20%	20%	15%
Theoretical income tax expense at average tax rate	**(425,494)**	**(318,537)**	**(177,392)**
Non-taxable income	135,972	61,739	47,610
Non-deductible expenses	(4,121)	(2,086)	(1,371)
Correction of prior year dedarations	910	(2,342)	(2,846)
Tax at the domestic rates applicable to profits in each country	(2,725)	(965)	(3,585)
Effects from changes in tax legislation	-	110	(53,074)
Expenses recognised for tax purposes only	7,013	7,030	-
Other	(1,128)	(3,917)	51
Income tax expense	**(289,573)**	**(258,968)**	**(190,607)**

Non-taxable income primarily comprises the tax effect on bargain purchase gain at acquisition of associate, share of post-acquisition profit or loss of associates and interest income from investment securities which are exempt from current income tax.

14. Taxation (continued)

Applicable taxes in Georgia and Belarus include corporate income tax (profit tax), individuals' withholding taxes, property tax and value added tax, among others. However, regulations are often unclear or non-existent and few precedents have been established. This creates tax risks in Georgia and Belarus, substantially more significant than typically found in countries with more developed tax systems. Management believes that the Group is in substantial compliance with the tax laws affecting its operations. However, the risk remains that relevant authorities could take differing positions with regard to interpretative issues.

As at 31 December 2024, 31 December 2023 and 31 December 2022, income tax assets and liabilities consist of the following:

	As at		
	2024	*2023*	*2022*
Current income tax assets	45,738	-	224
Deferred income tax assets	320	464	640
Income tax assets	**46,058**	**464**	**864**
Current income tax liabilities	1,155	185,440	20,258
Deferred income tax liabilities	19,899	13,618	79,275
Income tax liabilities	**21,054**	**199,058**	**99,533**

Deferred tax assets and liabilities as at 31 December 2024, 31 December 2023 and 31 December 2022, and their movements for the respective years, are as follows:

		Origination and reversal of temporary differences		*Origination and reversal of temporary differences*		*Origination and reversal of temporary differences*	
	2021	*In the income statement*	*2022*	*In the income statement*	*2023*	*In the income statement*	*2024*
Tax effect of deductible temporary differences:							
Amounts due to credit institutions	-	193	193	(30)	163	(72)	91
Investment securities	-	294	294	(489)	(195)	210	15
Investment properties	167	1,954	2,121	(2,121)	-	328	328
Insurance premiums receivables	-	-	-	-	-	-	-
Allowances for impairment and provisions for other losses	-	-	-	-	-	-	-
Tax losses carried forward	-	-	-	-	-	-	-
Property and equipment	2,414	(182)	2,232	(1,072)	1,160	298	1,458
Intangible assets	-	-	-	24	24	(24)	-
Assets held for sale	-	465	465	(127)	338	73	411
Lease liability	3,770	19,389	23,159	5,012	28,171	8,028	36,199
Accruals and deferred income	19,744	18,388	38,132	5,393	43,525	3,173	46,698
Other assets and liabilities	435	3,845	4,280	1,415	5,695	(1,233)	4,462
Deferred tax assets	**26,530**	**44,346**	**70,876**	**8,005**	**78,881**	**10,781**	**89,662**
Tax effect of taxable temporary differences:							
Amounts due to credit institutions	2,287	1,660	3,947	(651)	3,296	1,119	4,415
Debt securities issued	692	1,259	1,951	(414)	1,537	1,062	2,599
Cash and cash equivalents	-	-	-	240	240	(240)	-
Investment securities	-	-	-	-	-	-	-
Loans to customers, factoring and finance lease receivables	29,874	30,697	60,571	(57,006)	3,565	2,697	6,262
Client deposits and notes	-	-	-	104	104	(77)	27
Property and equipment	5,900	37,342	43,242	4,309	47,551	3,509	51,060
Right-of-use assets	3,216	20,606	23,822	3,719	27,541	4,981	32,522
Investment properties	965	7,822	8,787	(1,277)	7,510	3,144	10,654
Intangible assets	-	-	-	-	-	-	-
Assets held for sale	485	(485)	-	-	-	162	162
Accruals and deferred income	113	(113)	-	-	-	-	-
Other assets and liabilities	8,412	(1,221)	7,191	(6,500)	691	849	1,540
Deferred tax liabilities	**51,944**	**97,567**	**149,511**	**(57,476)**	**92,035**	**17,206**	**109,241**
Net deferred tax liabilities	**(25,414)**	**(53,221)**	**(78,635)**	**65,481**	**(13,154)**	**(6,425)**	**(19,579)**

No deferred tax liability was recognised on a gain on bargain purchase arising from acquisition of interest in the associate as the Group together with its ultimate parent who is controlling investor in Ameriabank does not intend to either sell Ameriabank or distribute dividends from profits accumulated prior to acquisition.

15. Other assets and other liabilities

Other assets comprise:

	2024	*2023*	*2022*
Receivables from remittance operations	96,210	138,833	86,701
Other receivables	76,490	70,538	69,907
Derivative financial assets	24,186	10,942	39,270
Inventory	12,296	13,756	11,441
Derivatives margin	11,199	12,129	21,053
Operating tax assets	3,876	6,219	3,897
Assets purchased for finance lease purposes	1,441	2,019	2,140
Other	44,012	40,975	27,540
Other assets, gross	**269,710**	**295,411**	**261,949**
Less – Allowance for impairment of other assets	(14,368)	(14,796)	(16,853)
Other assets, net	**255,342**	**280,615**	**245,096**

Other receivables mainly include operating lease receivables and receivables from guarantees and letters of credit.

Other liabilities comprise:

	2024	*2023*	*2022*
Creditors	43,269	36,878	32,381
Payables for remittance operations	33,060	59,079	24,671
Transfers in transit	31,991	-	-
Derivative financial liabilities	5,633	25,779	59,020
Other taxes payable	5,628	3,926	5,619
Dividends payable	5,030	3,522	2,346
Provisions	4,321	6,304	5,127
Advances received	2,460	629	805
Accounts payable	1,282	1,469	2,131
Derivatives margin	419	-	-
Other	16,236	12,261	21,491
Other liabilities	**149,329**	**149,847**	**153,591**

In 2024, the Group revisited classification of certain liabilities recorded on transit accounts at the end of the reporting period and presented under Client deposits and notes in the prior period financial statements. Based on the detailed assessment of the nature of these balances, to improve the presentation the Group reclassified these balances to Other liabilities within "Transfers in Transit" note line. Prior period balances were not reclassified due to immateriality.

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 amount of a derivative's underlying asset or liability, 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 the year-end and are not indicative of the credit risk.

	2024		
	Notional amount	*Fair value*	
		Asset	*Liability*
Foreign exchange contracts			
Forwards and swaps – domestic	874,302	1,170	3,923
Forwards and swaps – foreign	3,885,120	23,016	1,710
Total derivative assets / liabilities	**4,759,422**	**24,186**	**5,633**

15. Other assets and other liabilities (continued)

	2023			2022		
	Notional amount	Fair value		Notional amount	Fair value	
		Asset	Liability		Asset	Liability
Foreign exchange contracts						
Forwards and swaps – domestic	1,099,787	2,703	3,712	1,392,118	5,688	2,873
Forwards and swaps – foreign	3,776,221	8,239	22,067	4,615,758	33,234	56,147
Interest rate contracts						
Forwards and swaps – foreign	-	-	-	1,209	348	-
Options - foreign (IR)	-	-	-	-	-	-
Total derivative assets / liabilities	**4,876,008**	**10,942**	**25,779**	**6,009,085**	**39,270**	**59,020**

For the period ended 31 December 2024 GEL 136,058 was recognised as net foreign currency gain from derivative financial instruments (2023: GEL 59,662, 2022: GEL 277,513).

16. Client deposits and notes

The amounts due to customers include the following:

	2024	2023	2022
Current accounts	13,890,159	12,445,328	11,029,798
Time deposits	11,451,574	8,331,488	7,244,263
Client deposits and notes	**25,341,733**	**20,776,816**	**18,274,061**

Held as security against letters of credit and	**285,428**	**334,092**	**121,753**

At 31 December 2024, amounts due to customers of GEL 3,503,756 (14%) were due to the ten largest customers (2023: GEL 2,042,323 (10%), 2022: GEL 2,107,058 (12%)).

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

	2024	2023	2022
Individuals	14,990,138	12,883,062	11,158,313
Private enterprises	8,999,812	7,399,436	6,424,514
State and state-owned entities	1,351,783	494,318	691,234
Client deposits and notes	**25,341,733**	**20,776,816**	**18,274,061**

The breakdown of customer accounts by industry sector is as follows:

	2024	2023	2022
Individuals	14,990,138	12,883,062	11,158,313
Financial intermediation	2,243,039	1,716,673	1,316,330
Trade	1,495,994	1,367,950	1,158,681
Construction	1,238,856	1,140,925	796,019
Government services	1,271,027	445,880	682,809
Service	938,882	862,354	734,205
Transport & communication	798,335	621,322	488,132
Manufacturing	580,349	492,516	758,774
Electricity, gas and water supply	440,015	76,384	186,517
Real estate	419,687	346,751	233,177
Hospitality	107,778	108,103	172,925
Agriculture	63,475	37,337	26,066
Other	754,158	677,559	562,113
Client deposits and notes	**25,341,733**	**20,776,816**	**18,274,061**

17. Amounts owed to credit institutions

Amounts due to credit institutions comprise:

	2024	*2023*	*2022*
Short-term loans from National Bank of Georgia	2,546,574	2,101,653	1,715,257
Borrowings from international credit institutions	2,467,757	1,771,716	1,500,037
Correspondent accounts	541,352	431,232	660,768
Time deposits and inter-bank loans	465,227	130,382	777,638
	6,020,910	**4,434,983**	**4,653,700**
Non-convertible subordinated debt	548,151	562,520	401,733
Additional Tier 1	141,433	135,526	136,061
Amounts due to credit institutions	**6,710,494**	**5,133,029**	**5,191,494**

During the year ended 31 December 2024, the Group paid up to 13.76% and 11.12% on USD and EUR, respectively, borrowings from international credit institutions (2023: up to 9.36% and 0.00%, 2022: up to 7.52% and 0.95%). During the year ended 31 December 2024, the Group paid up to 12.25% and 9.22% on USD and EUR, respectively, subordinated debt (2023: up to 11.82% and 0.00%, 2022: up to 10.73% and 0.00%).

Some long-term borrowings from international credit institutions are received upon certain conditions (the "Lender Covenants") that the Group maintains different limits for capital adequacy, liquidity, currency positions, credit exposures, leverage and others. At 31 December 2024, 31 December 2023 and 31 December 2022, the Group complied with all material Lender Covenants of the borrowings from international credit institutions and it does not identify any significant risk of being not in compliance with the covenants over next 12 months.

On 31 August 2023, the Bank signed a USD 100 million loan agreement with Japan International Cooperation Agency as lender with maturity of five years, which was fully utilised as at 31 December 2023.

On 13 September 2023, the Bank signed a loan agreement with Asian Development Bank as lender with maturity of five years in the amount of the GEL equivalent of USD 100 million, which was fully utilised as at 31 December 2023.

On 31 May 2022, the Bank signed a USD 50 million Additional Tier 1 Capital Perpetual Subordinated Syndicated Facility with the European Bank for Reconstruction and Development and Swedfund International AB as lenders. The amount was fully utilised as at 31 December 2022.

In June 2022, the Bank repaid the outstanding USD 70 million of its initial USD 90 million subordinated loan facility from the International Finance Corporation, out of which USD 42 million qualified as Tier II capital.

Subordinated debt contracts details (more than 10% of total subordinated debt, on a contract basis):

Facility provider	Commencement date	Maturity date	Interest rate	Currency	Original contractual value	Carrying value as at 31 December 2024	Carrying value as at 31 December 2023	Carrying value as at 31 December 2022
FMO - Dutch entrepreneurial development bank	20-Dec-19	20-Dec-29	10.5%	USD	127,000	359,183	345,364	345,709
European Bank for Reconstruction and Development	7-Jun-22	10-Jun-27	13.4%	USD	35,000	99,003	94,868	95,243
GREEN FOR GROWTH FUND, SOUTHEAST EUROPE S.A SICAV	27-Dec-23	15-Dec-33	8.0%	EUR	25,000	72,642	74,459	-
						530,828	**514,691**	**440,952**

18. Debt securities issued

Debt securities issued comprise:

	2024	*2023*	*2022*
Additional Tier 1 capital notes issued	850,397	267,113	267,702
Tier 2 notes issued	140,620	83,158	-
Certificates of deposit	91,814	64,278	107,022
Eurobonds and notes issued	-	-	226,857
Local bonds	16,506	6,810	44,556
Debt securities issued	**1,099,337**	**421,359**	**646,137**

In April 2024 JSC Bank of Georgia issued USD 300 million (GEL 800,970) 9.5% perpetual subordinated callable additional tier 1 notes.

In June 2024 JSC Bank of Georgia fully repaid USD 100 million (GEL 283,570) additional tier 1 notes issued in 2019.

18. Debt securities issued (continued)

With respect to any additional tier 1 instrument of the Bank, no event of default may be declared and, thus, no acceleration may be triggered thereunder.

Furthermore, the payment obligations of the Bank under any additional tier 1 instrument constitute direct, unsecured and subordinated obligations of the Bank, but subject to any other ranking that may apply as a result of any mandatory provision of the laws of Georgia, and upon the insolvency or the liquidation of the Bank, rank:

a. Pari passu and without any preference with (A) any claims for principal in respect of other contractually subordinated obligations of the Bank qualifying as additional tier 1 instruments, and (B) any other subordinated obligations of the Bank which by law and/or by their terms, to the extent permitted by the laws of Georgia, rank pari passu with the Bank's obligations under the additional tier 1 instrument;
b. Junior to (A) any claims for principal in respect of unsubordinated obligations of the Bank, (B) any subordinated obligations of the Bank qualifying as tier 2 instruments, (C) any claims in respect of other contractually subordinated obligations of the Bank not qualifying as additional tier 1 instruments and which do not fall within item (i) above or item (ii) below, and (D) any other subordinated obligations of the Bank which by law and/or by their terms, to the extent permitted by the laws of Georgia, rank senior to the Bank's obligations under the additional tier 1 instrument; and
c. Senior to (A) any claims for the liquidation amount of the ordinary shares in the capital of the Bank, and (B) any other subordinated obligations of the Bank which by law and/or by their terms, to the extent permitted by the laws of Georgia, rank junior to the Bank's obligations under the additional tier 1 instrument.

No terms for conversion into capital or conversion into other obligations are prescribed under additional tier 1 instruments of the Bank.

With respect to any tier 2 instrument of the Bank, an event of default may be declared and, thus, acceleration may be triggered thereunder only in case of the insolvency or the liquidation of the Bank.

Furthermore, the payment obligations of the Bank under any tier 2 instrument constitute direct, unsecured and subordinated obligations of the Bank, but subject to any other ranking that may apply as a result of any mandatory provision of the laws of Georgia, and upon the insolvency or the liquidation of the Bank, rank:

a. Pari passu and without any preference with (A) any claims for principal in respect of other contractually subordinated obligations of the Bank qualifying as tier 2 instruments, and (B) any other subordinated obligations of the Bank which by law and/or by their terms, to the extent permitted by the laws of Georgia, rank pari passu with the Bank's obligations under the tier 2 instrument;
b. Junior to (A) any claims for principal in respect of unsubordinated obligations of the Bank, (B) any claims in respect of other contractually subordinated obligations of the Bank not qualifying as tier 2 instruments and which do not fall within item (i) above or item (ii) below, and (C) any other subordinated obligations of the Bank which by law and/or by their terms, to the extent permitted by the laws of Georgia, rank senior to the Bank's obligations under the tier 2 instrument; and
c. Senior to (A) any claims for the liquidation amount of the ordinary shares in the capital of the Bank, (B) any additional tier 1 instruments of the Bank, and (C) any other subordinated obligations of the Bank which by law and/or by their terms, to the extent permitted by the laws of Georgia, rank junior to the Bank's obligations under the tier 2 instrument.

No terms for conversion into capital or conversion into other obligations are prescribed under tier 2 instruments of the Bank.

18. Debt securities issued (continued)

Changes in liabilities arising from financing activities

	Eurobonds and notes issued	Additional Tier 1 capital notes issued	Tier 2 notes issued
Carrying amount at 31 December 2021	**938,372**	**306,239**	**-**
Repurchase of debt securities issued	(617,194)	-	-
Repayment of the principal portion of the debt securities issued	(31,581)	-	-
Foreign exchange movements	(39,915)	-	-
Other movements	(22,825)	(38,537)	-
Carrying amount at 31 December 2022	**226,857**	**267,702**	**-**
Repurchase of debt securities issued	(20,980)	-	-
Repayment of the principal portion of the debt securities issued	(230,995)	-	-
Proceeds from Tier 2 notes issued	-	-	78,921
Foreign exchange movements	(860)	-	1,428
Other movements	25,978	(589)	2,809
Carrying amount at 31 December 2023	**-**	**267,113**	**83,158**
Repayment of the principal portion of the debt securities issued	-	(283,570)	-
Proceeds from Additional Tier 1 notes	-	800,970	-
Proceeds from Tier 2 notes issued	-	-	51,126
Foreign exchange movements	-	40,881	5,120
Other movements	-	25,003	1,216
Carrying amount at 31 December 2024	**-**	**850,397**	**140,620**

19. Commitments and contingencies

Legal

Sai-invest

As at 31 December 2024, the Bank was engaged in litigation with Sai-Invest LLC ("Sai-Invest") in relation to a deposit pledge in the amount of EUR 7 million for the benefit of LTD Sport Invest's loans owing to JSC Bank of Georgia. Sai-Invest LLC has challenged the validity of the deposit pledge in the Georgian courts, and its challenge has been substantially sustained in the Court of Appeal, a determination which the Bank believes to be erroneous and without merit, and which the Bank has appealed to the Supreme Court. The matter is currently under review by the Supreme Court, and the timeline as to when the judgment has to be expected is not available. The Bank's management is of the opinion that the probability of incurring material losses on this claim is low, and, accordingly, no provision has been made in these consolidated financial statements.

In the ordinary course of business, the Group 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 Group

19. Commitments and contingencies (continued)

Financial commitments and contingencies

As at 31 December 2024, 31 December 2023 and 31 December 2022**,** the Group's financial commitments and contingencies comprised the following:

	2024	*2023*	*2022*
Credit-related commitments			
Financial and performance guarantees issued*	1,953,802	1,918,997	1,717,308
Undrawn loan facilities	1,009,437	1,014,951	869,061
Letters of credit	82,400	77,545	116,309
	3,045,639	**3,011,493**	**2,702,678**
Less – Cash held as security against letters of credit and guarantees (Note 16)	(285,428)	(334,092)	(121,753)
Less – Provisions	(4,321)	(6,304)	(5,127)
Capital expenditure commitments	**11,123**	**7,559**	**6,790**
Total commitments	**2,767,013**	**2,678,656**	**2,582,588**

** Out of total guarantees issued as at 31 December 2024 financial and performance guarantees of the Group comprised GEL 1,067,216 (31 December 2023: GEL 1,162,825, 31 December 2022: GEL 988,094) and GEL 886,586 (31 December 2023: GEL 756,172, 31 December 2022: GEL 729,214), respectively.*

The Group discloses its undrawn loan facility balances based on the contractual terms and existing practice in regards to disbursement of these amounts. The balances are disclosed as commitments if the Group has an established practice of disbursing undrawn amounts without any subsequent approval.

20. Equity

Share capital

As at 31 December 2024, 31 December 2023 and 31 December 2022, authorised common capital comprised 43,308,125 common shares. As at 31 December 2024, 31 December 2023 and 31 December 2022, issued share capital comprised 27,993,660 common shares, all of which were fully paid. Each share has a nominal value of one (1) Georgian Lari. Shares issued and outstanding as at 31 December 2024 are described below:

	Number of ordinary shares	*Amount of ordinary shares*
31 December 2021	**27,993,660**	**27,994**
31 December 2022	**27,993,660**	**27,994**
31 December 2023	**27,993,660**	**27,994**
31 December 2024	**27,993,660**	**27,994**

Treasury shares

The number of treasury shares held by the Group as at 31 December 2024, comprised 11,366 (31 December 2023: 11,366, 31 December 2022: 10,173), with nominal amount of GEL 11 (31 December 2023: GEL 11, 31 December 2022: GEL 10).

20. Equity (continued)

Dividends

Shareholders are entitled to dividends in Georgian Lari.

On 26 August 2024, the Board of JSC Bank of Georgia declared an interim dividend for 2024 of Georgian Lari 8.62 per share. Payment of the total GEL 241,297 interim dividends was received by shareholders on 23 September 2024.

On 26 June 2024, the Board of JSC Bank of Georgia declared a final dividend for 2023 of Georgian Lari 9.73 per share. Payment of the total GEL 272,171 final dividends was received by shareholders on 2 July 2024.

On 13 February 2024, the Board of JSC Bank of Georgia declared a dividend for 2023 of Georgian Lari 6.65 per share. Payment of the total GEL 186,000 final dividends was received by shareholders on 1 March 2024.

On 23 August 2023, the Board of JSC Bank of Georgia declared an interim dividend for 2023 of Georgian Lari 7.04 per share. Payment of the total GEL 196,956 interim dividends was received by shareholders on 26 September 2023.

On 1 May 2023, the Board of JSC Bank of Georgia declared a final dividend for 2022 of Georgian Lari 14.69 per share. Payment of the total GEL 410,999 final dividends was received by shareholders on 8 May 2023.

On 16 August 2022, the Board of JSC Bank of Georgia declared an interim dividend for 2022 of Georgian Lari 4.65 per share. Payment of the total GEL 129,914 interim dividends was received by shareholders on 10 October 2022.

On 20 June 2022, the Board of JSC Bank of Georgia declared a final dividend for 2021 of Georgian Lari 5.18 per share. Payment of the total GEL 145,065 final dividends was received by shareholders on 5 July 2022.

Nature and purpose of other reserves

Unrealised gains (losses) on investment securities
This reserve records fair value and ECL changes on investment securities.

Unrealised gains (losses) from dilution or sale / acquisition of shares in existing subsidiaries
This reserve records unrealised gains (losses) from dilution or sale / acquisition of shares in existing subsidiaries.

Foreign currency translation reserve
The foreign currency translation reserve is used to record exchange differences arising from the translation of the financial statements of subsidiaries with functional currency other than GEL. Movements on this account during the years ended 31 December 2024, 31 December 2023 and 31 December 2022, are presented in the statements of other comprehensive income.

The movements in other reserve reserves were as follows:

	Unrealised gains (losses) on investment securities	*Unrealised gains (losses) from dilution or sale / acquisition of shares in existing subsidiaries*	*Currency Translation Reserves*	*Other*
31 December 2021	**(7,694)**	**(7,956)**	**(5,376)**	**(3,044)**
Net change in FV on investments in debt securities measured at FVOCI	29,683	-	-	-
Net gain (loss) on investments in equity instruments designated at FVOCI	(1,369)	-	-	-
Change in allowance for ECL investments in debt instruments measured at FVOCI redassified to the consolidated income statement	7,379	-	-	-
Realised loss on financial assets measured at FVOCI	(7,528)	-	-	-
Loss from currency translation differences	973	-	(9,372)	-
31 December 2022	**21,444**	**(7,956)**	**(14,748)**	**(3,044)**
Net change in FV on investments in debt securities measured at FVOCI	26,381	-	-	-
Net gain (loss) on investments in equity instruments designated at FVOCI	1,775	-	-	-
Change in allowance for ECL investments in debt instruments measured at FVOCI redassified to the consolidated income statement	1,041	-	-	-
Realised loss on financial assets measured at FVOCI	(14,322)	-	-	-
Loss from currency translation differences	(108)	-	(8,376)	-
31 December 2023	**36,211**	**(7,956)**	**(23,124)**	**(3,044)**
Net change in FV on investments in debt securities measured at FVOCI	20,845	-	-	-
Net gain (loss) on investments in equity instruments designated at FVOCI	911	-	-	-
Change in allowance for ECL investments in debt instruments measured at FVOCI redassified to the consolidated income statement	2,513	-	-	-
Realised loss on financial assets measured at FVOCI	(1,631)	-	-	-
Gain from currency translation differences	303	-	7,754	-
Equity-accounted investees – share of OCI	-	-	-	17,526
Other movement	-	-	-	1,144
31 December 2024	**59,152**	**(7,956)**	**(15,370)**	**15,626**

Earnings per share

Basic and diluted earnings per share	***2024***	***2023***	***2022***
Profit for the year attributable to ordinary shareholders of the Bank	1,837,899	1,333,719	992,004
Weighted average number of ordinary shares outstanding during the year	27,982,634	27,983,526	27,983,827
Earnings per share	65.6800	47.6609	35.4492

20. Equity (continued)

The "share capital" indicated in the bank's consolidated statement of financial position constitutes the " subscribed capital" as defined under the Law of Georgia on Entrepreneurs. Accordingly, it is subject to the requirements established under Article 169 of the Law of Georgia on Entrepreneurs concerning dividend distribution and capital reduction. Specifically, the restrictions established by the Law, which apply to the bank due to the existence of " subscribed capital" (hereinafter referred to in this document as "share capital"), are as follows:

- Payment of funds to shareholders resulting from the reduction of subscribed capital, or releasing shareholders wholly or partially from making contributions to the subscribed capital, is permissible only not earlier than six months after the publication of the decision on the reduction of subscribed capital, provided that the company has satisfied or secured the claims of creditors that arose prior to the publication of the decision on the reduction of subscribed capital, or if such claims have been denied by a court.
- Such satisfaction or security must be provided to creditors if they notify the company of their claims within six months after the publication of the decision, except where, considering the company's assets, creditor protection is unnecessary. Creditors have the right to demand security if their claims against the company are not yet due.
- The published decision on the reduction of subscribed capital must include information about the creditors' rights to demand satisfaction or security.

Note: The requirements of the Law of Georgia on Entrepreneurs regarding subscribed capital (referred to in this document as "share capital") particularly the protective mechanisms associated with the distribution of dividends and reduction of capital under Article 169 of the Law of Georgia on Entrepreneurs—do not apply to other capital instruments defined in this document.

21. Net interest income

	2024	*2023*	*2022*
Interest income calculated using EIR method	**3,329,299**	**2,715,232**	**2,223,455**
From loans to customers	2,763,346	2,314,972	1,905,508
From investment securities	480,306	339,520	296,517
From amounts due from credit institutions	85,695	74,662	46,192
From factoring receivables	6,467	458	1,376
Net gain (loss) on modification of financial assets	(6,515)	(14,380)	(26,138)
Other interest income	**9,142**	**14,053**	**20,573**
From finance lease receivable	9,142	13,962	20,573
From other assets	-	91	-
Interest income	**3,338,441**	**2,729,285**	**2,244,028**
On dient deposits and notes	(969,144)	(811,254)	(573,148)
On amounts owed to credit institutions	(414,948)	(286,093)	(418,941)
On debt securities issued	(85,990)	(45,480)	(84,254)
Other interest expenses	(921)	-	-
Interest element of cross-currency swaps	11,838	25,276	29,402
On lease liability	(5,772)	(5,487)	(4,759)
Interest expense	**(1,464,937)**	**(1,123,038)**	**(1,051,700)**
Deposit insurance fees	(30,757)	(20,247)	(17,717)
Net interest income	**1,842,747**	**1,586,000**	**1,174,611**

For the period ended 31 December 2024 the Group recognised GEL 417,927(2023: GEL 297,662, 2022: GEL 283,381) interest income from investment securities measured at FVOCI.

The Group is required to make regular contributions to the Deposit Insurance Agencies, calculated based on its deposit portfolio. In the consolidated income statement, these contributions are presented as deposit insurance fees under Net interest income, as they are directly related to deposit acceptance activities.

22. Net fee and commission income

	2024	*2023*	*2022*
Settlements operations	646,459	537,730	444,629
Guarantees and letters of credit	55,049	45,323	35,283
Currency conversion operations	52,295	49,370	34,546
Cash operations	23,955	27,935	28,230
Brokerage service fees	389	616	49
Other	8,300	8,562	6,045
Fee and commission income	**786,447**	**669,536**	**548,782**
Settlements operations	(350,280)	(291,105)	(248,530)
Cash operations	(23,104)	(19,473)	(26,426)
Currency conversion operations	(10,153)	(8,971)	(5,378)
Brokerage service fees	(1,702)	(1,600)	(1,152)
Guarantees and letters of credit	(238)	(239)	(323)
Other	(13,162)	(7,476)	(5,553)
Fee and commission expense	**(398,639)**	**(328,864)**	**(287,362)**
Net fee and commission income	**387,808**	**340,672**	**261,420**

22. Net fee and commission income (continued)

Contract assets and liabilities

As at 31 December 2024, the Group has recognised GEL 64,936 revenue-related contract liabilities (2023: GEL 60,151, 2022: GEL 50,440). Accounts receivable are recognised when the right to consideration becomes unconditional. Deferred revenue is recognised as revenue as the Group performs under the contract.

The Group does not adjust the promised amount of consideration for the effects of a significant financing component if the Group expects, at contract inception, that the period between when the Group transfers a promised good or service to a customer and when the customer pays for that good or service will be one year or less.

In 2024, the Group recognised GEL 54,996 revenue (2023: GEL 48,303, 2022: GEL 38,495) mainly from Georgia that relates to carried-forward contract liabilities and was previously included in the deferred income.

Transaction price allocated to the remaining performance obligations

The following table includes revenue expected to be recognised in the future related to performance obligations that are unsatisfied at the reporting date:

	In 1 year	In 2 years	In 3 years	In 3 to 5 years	In 5 to 10 years	Total
As at 31 December 2024	61,370	1,508	1,916	38	104	**64,936**
As at 31 December 2023	55,724	2,425	1,324	593	87	**60,153**
As at 31 December 2022	47,788	2,465	126	43	18	**50,440**

23. Salaries and other employee benefits, and general and administrative expenses

Salaries and other employee benefits

	2024	*2023*	*2022*
Salaries and bonuses	(440,809)	(366,362)	(319,285)
Social security costs	(8,318)	(7,877)	(6,818)
Pension costs	(6,785)	(5,477)	(4,273)
Salaries and other employee benefits	**(455,912)**	**(379,716)**	**(330,376)**

In 2024, salaries and bonuses include GEL 66,820 of the Equity Compensation Plan costs (2023: GEL 70,970, 2022: GEL 80,955), associated with the existing share-based compensation scheme approved in the Group (Note 26).

The average number of staff employed by the Group for the years ended 31 December 2024, 31 December 2023 and 31 December 2022, comprised:

	2024	*2023*	*2022*
The Bank	7,740	6,981	6,324
BNB	814	802	654
Other	17	32	187
Average total number of staff employed	**8,571**	**7,815**	**7,165**

23. Salaries and other employee benefits, and general and administrative expenses (continued)

Salaries and other employee benefits (continued)

Average number of employees for the year:	***2024***	***2023***	***2022***
Permanent employment:			
Top management	21	15	27
Middle management	156	148	112
Other employees	8,388	7,633	6,981
	8,565	**7,796**	**7,120**
Temporary employment:			
Other employees	6	19	45
	6	**19**	**45**
Total	**8,571**	**7,815**	**7,165**

General and administrative expenses

	2024	***2023***	***2022***
Repairs and maintenance	(65,360)	(53,374)	(44,543)
Marketing and advertising	(51,185)	(45,348)	(36,637)
Legal and other professional services	(21,439)	(19,447)	(12,088)
Operating taxes	(14,337)	(11,846)	(11,578)
Office supplies	(8,742)	(9,208)	(7,920)
Personnel training and recruitment	(8,609)	(6,888)	(4,290)
Communication	(8,452)	(6,787)	(7,072)
Corporate hospitality and entertainment	(6,103)	(7,021)	(6,048)
Travel expenses	(6,594)	(7,005)	(5,298)
Occupancy and rent	(5,842)	(6,266)	(5,798)
Security	(4,380)	(4,303)	(3,176)
Insurance	(3,259)	(3,242)	(3,727)
Other	(5,771)	(4,122)	(3,537)
General and administrative expenses	**(210,073)**	**(184,857)**	**(151,712)**

Auditor remuneration

Auditor remuneration comprises:

	2024	***2023***	***2022***
Fees for the audit of the Bank's annual financial statements	985	771	634
Expenditures for other assurance services	362	471	386
Expenditures for other professional services	-	9	9
Transaction-related fees	655	-	-
Total fees	**2,002**	**1,251**	**1,029**

The figures shown in the above table relate to fees of EY LLC ("EY") and its associates. In 2024, fees paid to other auditors not associated with EY in respect of the audit of the Parent and Group's subsidiaries were GEL 197 (2023: GEL 719, 2022: GEL 106), and in respect of other services of the Group were GEL 750 (2023: GEL 230, 2022: GEL 579).

24. Cost of risk

The table below shows ECL charges on financial instruments for the year recorded in the income statement:

	Stage 1	Stage 2	Stage 3		POCI		
	Collective	Collective	Individual	Collective	Individual	Collective	Total
Cash and cash equivalents	252	-	-	-	-	-	252
Amounts due from credit institutions	335	-	-	-	-	-	335
Investment securities measured at amortised cost - debt instruments	(142)	-	-	-	-	-	(142)
Investment securities measured at FVOCI - debt instruments	(2,695)	-	-	-	-	-	(2,695)
Loans to customers at amortised cost	(10,815)	23,599	(57,717)	(38,363)	(3,640)	3,250	(83,686)
Factoring receivables	11	-	-	-	-	-	11
Finance lease receivables	2	319	(416)	(1,309)	-	2,459	1,055
Accounts receivable and other loans	(323)	-	-	-	-	-	(323)
Other financial assets	-	-	(1,572)	-	-	-	(1,572)
Financial guarantees	(609)	(457)	195	4	-	-	(867)
Letter of credit to customers	(68)	-	-	-	-	-	(68)
Other financial commitments	(138)	57	-	-	-	-	(81)
For the year ended 31 December 2024	**(14,190)**	**23,518**	**(59,510)**	**(39,668)**	**(3,640)**	**5,709**	**(87,781)**

	Stage 1	Stage 2	Stage 3		POCI		
	Collective	Collective	Individual	Collective	Individual	Collective	Total
Cash and cash equivalents	(182)	-	-	-	-	-	(182)
Amounts due from credit institutions	4,260	-	-	-	-	-	4,260
Investment securities measured at amortised cost - debt instruments	3,766	-	-	-	-	-	3,766
Investment securities measured at FVOCI - debt instruments	(1,932)	-	-	-	-	-	(1,932)
Loans to customers at amortised cost	16,933	(8,121)	(157)	(129,119)	-	(3,727)	(124,191)
Factoring receivables	121	61	-	-	-	-	182
Finance lease receivables	(147)	(121)	(92)	(3,231)	-	829	(2,762)
Other financial assets	-	-	(3,855)	-	-	-	(3,855)
Financial guarantees	284	(2)	24	5	-	-	311
Letter of credit to customers	15	-	-	-	-		15
Other financial commitments	721	13	-	-	-	-	734
For the year ended 31 December 2023	**23,839**	**(8,170)**	**(4,080)**	**(132,345)**	**-**	**(2,898)**	**(123,654)**

	Stage 1	Stage 2	Stage 3		POCI		
	Collective	Collective	Individual	Collective	Individual	Collective	Total
Cash and cash equivalents	(334)	-	-	-	-	-	(334)
Amounts due from credit institutions	(5,179)	-	-	-	-	-	(5,179)
Investment securities measured at amortised cost - debt instruments	(3,199)	-	-	-	-	-	(3,199)
Investment securities measured at FVOCI - debt instruments	(3,896)	-	-	-	-	-	(3,896)
Loans to customers at amortised cost	19,970	(15,372)	53,516	(177,169)	-	(10,598)	(129,653)
Factoring receivables	10	(61)	-	-	-	-	(51)
Finance lease receivables	292	487	784	(1,886)	-	(2,885)	(3,208)
Other financial assets	(4,204)	-	-	-	-	-	(4,204)
Financial guarantees	(437)	6	32	2	-	-	(397)
Letter of credit to customers	(33)	-	65	-	-		32
Other financial commitments	140	292	-	-	-	-	432
For the year ended 31 December 2022	**3,130**	**(14,648)**	**54,397**	**(179,053)**	**-**	**(13,483)**	**(149,657)**

Impairment charge on other assets and provisions comprise:

	2024	*2023*	*2022*
Impairment (charge)/reversal on assets held for sale	(1,309)	(4,550)	(4,295)
Litigation provision reversal/(charge)	(713)	(2,388)	341
Other impairment charge	(12,361)	(11,379)	(14,053)
Impairment charge on other assets and provisions	**(14,383)**	**(18,317)**	**(18,007)**

25. Net other gains/(losses)

	2024	*2023*	*2022*
Net real estate gains / (losses)	22,400	92,520	21,128
Net gains / (losses) from revaluation of investment property	21,595	579	6,645
Net gains / (losses) on derecognition of financial assets measured at fair value through other comprehensive income	1,631	18,512	7,528
Net gains / (losses) on financial assets at fair value through profit or loss	223	-	(1,204)
Net other gains / (losses)	3,594	2,935	6,459
Net other gains / (losses)	**49,443**	**114,546**	**40,556**

During 2021-2023, the Group repossessed significant movable and immovable assets from a defaulted group of borrowers via the public auction at a deep discount. The properties were classified as Foreclosed Assets and measured at the lower of cost and net realizable value. The Group managed to realize various properties at then current market prices in 2023 and recorded respective real estate gain in an amount of GEL 81,327 in its consolidated financial statements.

26. Share-based payments

Executives' Equity Compensation Plan ("EECP") and Employees' Equity Compensation Plan ("EECP")

In 2015, the Group set up Executive Equity Compensation Trustee – Apex Group Fiduciary Limited (formerly Sanne Fiduciary Services Limited) (the "Trustee") which acts as the trustee of the Group's ("EECP"). The Group makes contributions to the Trustee in respect of the awards granted within EECP. JSC BGEO Group has the legal obligation to settle the awards. In granting the awards, the Bank acts as the agent of the parent and the ultimate parent.

In 2019, the Group set up the Group's Employee Equity Compensation Trustee – Apex Group Fiduciary services limited (formerly Sanne Fiduciary Services Limited) (the "Trustee") which acts as the trustee of the Group's Employees' Equity Compensation Plan ("EECP").

In 2024, the Group contributed GEL 77,377 (2023: GEL 109,667, 2022: GEL 71,891) as intra-group recharge under share-based compensation schemes described above.

Share-based payment transactions fixed in monetary terms

In 2022, the Group introduced the new remuneration policy for the Management Board and Key Material Risk Taker (MRT) employees. Under the new policy, part of the fixed component of the remuneration is fixed in monetary terms at the date of the contract and shall be paid by award of the number of shares equivalent to the fixed monetary value as at the date of the award. Such awards vest immediately following the award year and are subject to holding period of up the four years. For the CEO, annual remuneration paid in shares is fixed every three years, whereas for other members of the Management Board and MRTs the remuneration is set annually. As for the variable share remuneration, it is awarded annually in the form of nil-cost options over the shares of Lion Finance Group PLC and is also fixed in monetary terms at the date of the contract. Such awards are subject to vesting and holding periods.

The awards of shares in monetary terms are accounted as equity-settled transactions and are measured by reference to the monetary value (as awarded) adjusted for the time value of money where necessary. The cost of equity-settled transactions is recognised together with the corresponding increase in equity as part of additional paid-in capital, over the period in which the service conditions are fulfilled, ending on the date when the relevant employee is fully entitled to the award (the 'vesting date').

In 2024, Lion Finance Group PLC's Remuneration Committee resolved to award 193,767 ordinary shares of Lion Finance Group PLC to the members of the Management Board and 46,186 ordinary shares of Lion Finance Group PLC to the Group's 16 executives. Shares awarded to the Management Board are subject to five-year vesting and two-year holding periods, while those awarded to the other 16 executives are subject to three-year vesting periods with continuous employment being the only vesting condition for both awards. The Group considers 12 February 2024 as the grant date. The Group estimates that the fair value of the shares awarded on 12 February 2024 was Georgian Lari 128.47 per share.

In 2023, Lion Finance Group PLC's Remuneration Committee resolved to award 241,500 ordinary shares of Lion Finance Group PLC to the members of the Management Board and 74,520 ordinary shares of Lion Finance Group PLC to the Group's 18 executives. Shares awarded to the Management Board are subject to five-year vesting and two-year holding periods, while those awarded to the other 18 executives are subject to three-year vesting periods with continuous employment being the only vesting condition for both awards. The Group considers 9 February, 10 May and 20 October 2023 as the grant date. The Group estimates that the fair value of the shares awarded on 9 February, 10 May and 20 October 2023 was Georgian Lari 87.65, 99.04 and 106.31 per share.

26. Share-based payments (continued)

In 2022, Lion Finance Group PLC's Remuneration Committee resolved to award 350,017 ordinary shares of Lion Finance Group Group PLC to the members of the Management Board and 54,851 ordinary shares of Lion Finance Group PLC to the Group's 13 executives. Shares awarded to the Management Board are subject to two-year vesting and two-year holding periods, while those awarded to the other 13 executives are subject to three-year vesting periods with continuous employment being the only vesting condition for both awards. The Group considers 31 January 2022 as the grant date. The Group estimates that the fair value of the shares awarded on 31 January 2022 was Georgian Lari 59.98 per share.

In 2024, Management Board members signed fixed contingent share-based compensation agreements, with fixed contract value of GEL 15,777. The Group considers 1 January 2024 as the grant dates for the awards. The Group estimated the value of the shares were Georgian Lari 129.23 per share respectively, based on the five working day average share price before the 25 December 2023 and using the grant date exchange rates, respectively. The awards are subject to one-year vesting and four-year holding periods.

In 2024, the Group's other executive members signed fixed contingent share-based compensation agreements, with fixed contract value of GEL 4,973. The Group considers 1 January 2024 and 1 July 2024 as the grant dates for the awards. The Group estimated the value of the shares were Georgian Lari 129.23 and 135.03 per share respectively, based on the five working day average share price before the 25 December 2023 and using grant date exchange rates, respectively. The awards are subject to one-year vesting and three-year holding periods.

In 2023, Management Board members signed fixed contingent share-based compensation agreements, with fixed contract value of GEL 16,248. The Group considers 1 January 2023 as the grant dates for the awards. The Group estimated the value of the shares were Georgian Lari 82.91 per share respectively, based on the five working day average share price before the 25 December 2022, respectively. The awards are subject to one-year vesting and three-year holding periods.

In 2023, the Group's other executive members signed fixed contingent share-based compensation agreements, with fixed contract value of GEL 4,149. The Group considers 1 January 2023, 1 April 2023, 27 April 2023, 1 May 2023 and 1 June 2023 as the grant dates for the awards. The Group estimated the value of the shares were Georgian Lari 82.91, 78.44, 76.77, 76.61 and 79.99 per share respectively, based on the five working day average share price before the 25 December 2022, respectively. The awards are subject to one-year vesting and three-year holding periods.

In 2022, Management Board members signed fixed contingent share-based compensation agreements, with fixed contract value of GEL 46,168. The Group considers 1 January 2022 and 30 June 2022 as the grant dates for the awards. The Group estimated the value of the shares were Georgian Lari 64.10 and 60.77 per share respectively, based on the five working day average share price before the 25 December 2021, respectively. The awards are subject to one-year vesting and three-year holding periods.

In 2022, the Group's other executive members signed fixed contingent share-based compensation agreements, with fixed contract value of GEL 4,493. The Group considers 1 January 2022 and 1 July 2022 as the grant dates for the awards. The Group estimated the value of the shares were Georgian Lari 64.10 and 60.76 per share respectively, based on the five working day average share price before the 25 December 2021, respectively. The awards are subject to one-year vesting and three-year holding periods.

The Bank grants share compensation to its non-executive employees. In 2024, 2023 and 2022, the Supervisory Board of the Bank resolved to award 123,762, 127,676 and 189,382 ordinary shares, respectively, to its certain non-executive employees. All these awards are subject to three-year vesting, with continuous employment being the only vesting condition for all awards. The Group considers 12 February 2024, 09 February 2023 and 31 January 2022 as the grant dates of these awards, respectively. The Group estimates that the fair values of the shares awarded on 12 February 2024, 09 February 2023 and 31 January 2022 were Georgian Lari 128.47, 87.65 and 59.98 per share, respectively.

Summary

Fair value of the shares granted at the measurement date is determined based on available market quotations.

The weighted average fair value of share-based awards at the grant date comprised Georgian Lari 128.72 per share in year ended 31 December 2024 (31 December 2023: Georgian Lari 88.47 per share, 31 December 2022: Georgian Lari 62.28).

26. Share-based payments (continued)

The Group's total share-based payment expenses for the year ended 31 December 2024 comprised GEL 66,820 (31 December 2023: GEL 70,970, 31 December 2022: GEL 80,955) and are included in "salaries and other employee benefits", as "salaries and bonuses". Below is the summary of the share-based payments-related data:

	2024	*2023*	*2022*
Total number of equity instruments awarded	524,210	694,826	1,382,444
– Among them, to Management Board	*315,858*	*437,461*	*1,071,053*
Weighted average value at grant date, per share (GEL in full amount)	128.72	88.47	62.28
Value at grant date, total (GEL)	**67,476**	**61,469**	**86,105**
Total expense recognised during the year (GEL)	**(66,820)**	**(70,970)**	**(80,955)**

27. Risk management

Introduction

Risk is inherent in the Group'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 Group's continuing profitability and each individual within the Group is accountable for the risk exposures relating to his or her responsibilities. The Group is exposed to financial risks (including credit risk, capital and liquidity risk and market risk) as well as non-financial risks.

Risk Management structure

The Bank's risk management framework and risk appetite framework policies are based on the three lines of defence model and reflect the requirements of the Corporate Governance Code adopted by the NBG. The three lines of defence model enhances the understanding of risk management and control by clarifying roles and responsibilities within the Bank's different risk management bodies and business units in order to increase the effective management of risk and control.

Committees operating under the Supervisory Board:

Audit Committee
The Audit Committee assists the Supervisory Board in relation to the oversight of the Group's financial and reporting processes. It monitors the integrity of the financial statements and is responsible for governance around both the Internal Audit function and external auditor, reporting back to the Supervisory Board. It reviews the effectiveness of the policies, procedures and systems in place related to, among other operational risks, compliance, IT and Internal Security (including cyber-security), and works closely with the Risk Committee in connection with assessing the effectiveness of the risk management and internal control framework.

Risk Committee
The Risk Committee assists the Supervisory Board in relation to the oversight of risk. It reviews the Group's risk appetite in line with strategy, identifies and monitors risk exposure and the risk management infrastructure, oversees the implementation of strategy to address risk, and in conjunction with the Audit Committee, assesses the strength and effectiveness of the risk management and internal control framework.

Other risk management bodies:

Management Board
The Management Board has overall responsibility for the Bank's asset, liability and Risk Management activities, policies and procedures. In order to effectively implement the Risk Management system, the Management Board delegates individual Risk Management functions to each of the various decision-making and execution bodies within the Bank.

27. Risk management (continued)

Introduction (continued)

Bank Asset and Liability Management Committee
The Bank's Asset and Liability Management Committee ("ALCO") is the core Risk Management body that establishes policies and guidelines with respect to capital adequacy, market risks, liquidity and funding risks, interest rate and prepayment risks and respective limits, money market general terms and credit exposure limits, The ALCO reviews scenario analyses and stress tests, regularly monitors compliance with the pre-set risk limits and approves treasury deals.

Internal Audit
The Internal Audit department is responsible for the audit of the Group's Risk Management, internal control and corporate governance processes, with the aim of reducing the levels of operational and other risks, auditing the Group's internal control systems and detecting any infringements or errors on the part of the Group's departments and divisions. It examines both the adequacy and the Group's compliance with those procedures. The Group's Internal Audit department discusses the results of all assessments with management, and reports its findings and recommendations to the Audit Committee.

Risk measurement and reporting systems

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

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, and the head of each business division. The reports include aggregate credit exposures and their limits, exceptions to those limits, liquidity ratios and liquidity limits, market risk ratios and their limits, and changes to the risk profile. The Management Board receives a comprehensive credit risk report and ALCO report. These reports are designed to provide all the necessary information to assess and conclude on the risks of the Group.

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

Risk mitigation

As part of its overall Risk Management, the Group uses derivatives and other instruments to manage exposures resulting from changes in interest rates, foreign currencies, equity risks, credit risks, and exposures arising from expected future transactions. While these are intended for hedging, they do not qualify for hedge accounting.

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

27. Risk management (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 these counterparties represent related parties to each other, 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 also involve combined, aggregate exposures of large and significant credits compared with the total outstanding balance of the respective financial instrument. Concentrations indicate the relative sensitivity of the Group's performance to developments affecting a particular industry or geographical location.

In order to avoid excessive concentrations of risks, the Group's policies and procedures include specific guidelines to focus on, maintaining a diversified portfolio of financial assets. Identified concentrations of credit risks or liquidity / repayment risks are controlled and managed accordingly.

Credit risk

Credit risk is the risk that the Group will incur a loss because its customers fail to discharge their contractual obligations. The Group manages and controls credit risk by setting limits on the amount of risk it is willing to accept for individual counterparties and for geographical, industry, product and currency concentrations, and by monitoring exposures in relation to such limits.

The Group has established a credit quality review process to provide early identification of possible changes in the creditworthiness of counterparties. 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 Group to assess the potential loss as a result of the risks to which it is exposed and take corrective action. The maximum credit exposure is limited to the carrying value of respective instruments and notional amounts of guarantees and commitments provided.

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 statement of the financial position.

Credit-related commitment risks

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

Credit quality per class of financial assets

The credit quality of financial assets is managed by the Group through internal and external credit ratings used in ECL calculations.

For corporate loan portfolios, the Group runs an internal rating model which incorporate both qualitative and quantitative information and, in addition to information specific to each borrower, utilising supplemental external information that could affect the borrower's behaviour. It is the Group'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 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 Group's rating policy. Attributable risk ratings are assessed and updated regularly.

For Retail, Micro and SME loans, the Group uses external ratings provided by Credit Bureau.

The Group's treasury, trading and inter-bank relationships and counterparties comprise financial services institutions, banks and broker-dealers. For these, where external ratings provided by rating agencies are available, the Group Risk function uses such external ratings. For those where external ratings are not available internal ratings are assigned.

27. Risk management (continued)

Credit risk (continued)

The table below shows internal and external grades used in ECL calculating.

			External Rating Grades	
			Credit Bureau	Standard & Poor's
Internal Rating Description*	**Internal Rating Grades**			
High grade				
	Aaa	1	A	AAA
	Aa1	2+	B	AA+
	Aa2	2	C1	AA
	Aa3	2-	C2	AA-
	A1	3+	C3	A+
	A2	3		A
	A3	3-		A-
	Baa1	4+		BBB+
	Baa2	4		BBB
	Baa3	4-		BBB-
Standard grade				
	Ba2	5	D2	BB
	Ba3	5-	D3	BB-
	B1	6+		B+
	B2	6		B
Low grade				
	Caa1	7+	E2	CCC+
	Caa2	7	E3	CCC
	Caa3	7-		CCC-
	Ca			CC
				C

**Grades are not supposed to be corresponded to each other across the rating categories above.*

27. Risk management (continued)

Credit risk (continued)

The table below shows the credit quality by class of asset in the statement of financial position, presented in gross amounts, based on the Group's credit rating system.

A defaulted financial asset that is past due more than 90 days is assessed as a non-performing loan or as determined on individual basis based on other available information regarding financial difficulties of the borrower.

Other financial assets include receivables from remittance operations and other receivables.

Cash and cash equivalents, excluding cash on hand	***Stage 1***	***Total***
High grade	752,962	752,962
Standard grade	16,377	16,377
Low grade	57,053	57,053
Not rated	346,394	346,394
Balance at 31 December 2024	**1,172,786**	**1,172,786**

Amounts due from credit institutions	***Stage 1***	***Total***
Standard grade	2,424,181	2,424,181
Not rated	33,000	33,000
Balance at 31 December 2024	**2,457,181**	**2,457,181**

Investment securities measured at FVOCI - debt instruments	***Stage 1***	***Total***
High grade	2,365,268	2,365,268
Standard grade	3,471,050	3,471,050
Not rated	70,964	70,964
Balance at 31 December 2024	**5,907,282**	**5,907,282**

Investment securities measured at amortized cost - debt instruments	***Stage 1***	***Total***
High grade	1,693,825	1,693,825
Standard grade	85,725	85,725
Not rated	131,320	131,320
Balance at 31 December 2024	**1,910,870**	**1,910,870**

Investment securities pledged under sale and repurchase agreements and securities lending measured at FVOCI - debt instruments	***Stage 1***	***Total***
High grade	138,945	138,945
Balance at 31 December 2024	**138,945**	**138,945**

27. Risk management (continued)

Credit risk (continued)

Commercial loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	6,020,499	42,973	-	389	6,063,861
Standard grade	1,796,116	65,195	-	425	1,861,736
Low grade	93,300	162,971	-	-	256,271
Not rated	387,854	6,932	-	-	394,786
Defaulted					
Non-performing	-	-	173,730	11,934	185,664
Balance at 31 December 2024	**8,297,769**	**278,071**	**173,730**	**12,748**	**8,762,318**

Residential mortgage loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	3,736,156	10,808	-	4,601	3,751,565
Standard grade	717,635	24,055	-	4,960	746,650
Low grade	97,729	101,558	-	6,958	206,245
Not rated	259,478	1,401	-	116	260,995
Defaulted					
Non-performing	-	-	52,284	14,679	66,963
Balance at 31 December 2024	**4,810,998**	**137,822**	**52,284**	**31,314**	**5,032,418**

Micro and SME loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	2,258,340	25,236	-	346	2,283,922
Standard grade	985,952	59,770	-	149	1,045,871
Low grade	89,252	80,133	-	345	169,730
Not rated	729,415	27,211	91	171	756,888
Defaulted					
Non-performing	-	-	171,641	13,338	184,979
Balance at 31 December 2024	**4,062,959**	**192,350**	**171,732**	**14,349**	**4,441,390**

Consumer loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	3,503,803	10,343	-	1,879	3,516,025
Standard grade	1,532,755	41,342	-	3,455	1,577,552
Low grade	370,635	199,161	-	6,754	576,550
Not rated	396,919	2,878	-	-	399,797
Defaulted					
Non-performing	-	-	102,821	14,303	117,124
Other	-	-	1	-	1
Balance at 31 December 2024	**5,804,112**	**253,724**	**102,822**	**26,391**	**6,187,049**

Gold – pawn loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	70,790	113	-	-	70,903
Standard grade	49,746	516	-	-	50,262
Low grade	21,442	5,001	-	-	26,443
Not rated	3,888	19	-	-	3,907
Defaulted					
Non-performing	-	-	2,727	-	2,727
Balance at 31 December 2024	**145,866**	**5,649**	**2,727**	**-**	**154,242**

Finance lease receivables	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	87	366	-	3,781	4,234
Standard grade	-	58	-	2,870	2,928
Low grade	92	16	-	3,894	4,002
Not rated	42,839	515	-	-	43,354
Defaulted					
Non-performing	-	-	7,828	6,305	14,133
Other	-	-	-	347	347
Balance at 31 December 2024	**43,018**	**955**	**7,828**	**17,197**	**68,998**

Factoring receivables	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	31,947	-	-	-	31,947
Standard grade	1,500	-	-	-	1,500
Not rated	2,619	82	-	-	2,701
Defaulted					
Non-performing	-	-	32	-	32
Balance at 31 December 2024	**36,066**	**82**	**32**	**-**	**36,180**

27. Risk management (continued)

Credit risk (continued)

Accounts receivable	*Stage 1*	*Total*
Not rated	8,339	8,339
Balance at 31 December 2024	**8,339**	**8,339**

Other financial assets	*Stage 1*	*Total*
Not rated	172,700	172,700
Balance at 31 December 2024	**172,700**	**172,700**

Financial and performance guarantees issued	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	756,235	-	-	-	756,235
Standard grade	319,599	8,167	-	-	327,766
Low grade	37,929	28,374	-	-	66,303
Not rated	797,621	5,623	-	-	803,244
Defaulted					
Other	-	-	254	-	254
Balance at 31 December 2024	**1,911,384**	**42,164**	**254**	**-**	**1,953,802**

Letters of credit	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	78,830	-	-	-	78,830
Standard grade	3,328	-	-	-	3,328
Not rated	242	-	-	-	242
Balance at 31 December 2024	**82,400**	**-**	**-**	**-**	**82,400**

Undrawn loan facilities	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	755,232	168	-	-	755,400
Standard grade	163,806	5,784	-	-	169,590
Low grade	3,877	3,474	-	1	7,352
Not rated	76,194	166	30	-	76,390
Defaulted					
Non-performing	-	-	14	-	14
Other	-	-	677	14	691
Balance at 31 December 2024	**999,109**	**9,592**	**721**	**15**	**1,009,437**

Cash and cash equivalents, excluding cash on hand	*Stage 1*	*Total*
High grade	1,097,398	1,097,398
Standard grade	654,810	654,810
Low grade	32,372	32,372
Not rated	292,048	292,048
Balance at 31 December 2023	**2,076,628**	**2,076,628**

Amounts due from credit institutions	*Stage 1*	*Total*
High grade	1,734,224	1,734,224
Not rated	19,328	19,328
Balance at 31 December 2023	**1,753,552**	**1,753,552**

Investment securities measured at FVOCI - debt instruments	*Stage 1*	*Total*
High grade	2,202,596	2,202,596
Standard grade	2,058,495	2,058,495
Not rated	88,518	88,518
Balance at 31 December 2023	**4,349,609**	**4,349,609**

Investment securities measured at amortized cost - debt instruments	*Stage 1*	*Total*
High grade	387,623	387,623
Standard grade	25,101	25,101
Not rated	111,709	111,709
Balance at 31 December 2023	**524,433**	**524,433**

27. Risk management (continued)

Credit risk (continued)

Commercial loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	4,338,469	68,175	-	339	4,406,983
Standard grade	1,389,524	58,796	-	755	1,449,075
Low grade	132,266	372,006	-	-	504,272
Not rated	481,986	16,812	-	-	498,798
Defaulted					
Non-performing	-	-	97,721	22,481	120,202
Balance at 31 December 2023	**6,342,245**	**515,789**	**97,721**	**23,575**	**6,979,330**

Residential mortgage loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	3,346,499	11,608	-	4,209	3,362,316
Standard grade	714,568	45,712	-	3,689	763,969
Low grade	86,008	116,000	-	6,839	208,847
Not rated	153,263	732	-	131	154,126
Defaulted					
Non-performing	-	-	37,771	16,214	53,985
Other	-	-	13,175	1,107	14,282
Balance at 31 December 2023	**4,300,338**	**174,052**	**50,946**	**32,189**	**4,557,525**

Micro and SME loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	2,480,970	29,931	-	316	2,511,217
Standard grade	1,012,833	73,925	-	228	1,086,986
Low grade	75,930	76,380	-	242	152,552
Not rated	140,137	11,294	48	-	151,479
Defaulted					
Non-performing	-	-	167,506	2,364	169,870
Other	-	-	871	47	918
Balance at 31 December 2023	**3,709,870**	**191,530**	**168,425**	**3,197**	**4,073,022**

Consumer loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	2,693,768	7,996	-	2,405	2,704,169
Standard grade	1,179,793	50,968	-	3,069	1,233,830
Low grade	233,382	173,992	-	4,607	411,981
Not rated	218,817	1,273	90	-	220,180
Defaulted					
Non-performing	-	-	91,584	16,090	107,674
Other	-	-	19,795	2,340	22,135
Balance at 31 December 2023	**4,325,760**	**234,229**	**111,469**	**28,511**	**4,699,969**

Gold – pawn loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	65,002	48	-	-	65,050
Standard grade	40,495	733	-	-	41,228
Low grade	17,381	7,915	-	-	25,296
Not rated	14,538	-	273	-	14,811
Defaulted					
Non-performing	-	-	2,566	-	2,566
Other	-	-	1,277	-	1,277
Balance at 31 December 2023	**137,416**	**8,696**	**4,116**	**-**	**150,228**

Finance lease receivables	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	5,832	80	-	4,274	10,186
Standard grade	2,731	381	-	1,697	4,809
Low grade	475	1,261	-	2,161	3,897
Not rated	24,861	3,326	-	-	28,187
Defaulted					
Non-performing	-	-	12,064	10,391	22,455
Other	-	-	-	557	557
Balance at 31 December 2023	**33,899**	**5,048**	**12,064**	**19,080**	**70,091**

Factoring receivables	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	50,112	-	-	-	50,112
Standard grade	297	-	-	-	297
Low grade	1,222	-	-	-	1,222
Not rated	3,118	180	-	-	3,298
Defaulted					
Non-performing	-	-	98	-	98
Balance at 31 December 2023	**54,749**	**180**	**98**	**-**	**55,027**

27. Risk management (continued)

Credit risk (continued)

Accounts receivable	*Stage 1*	*Total*
Not rated	8,277	8,277
Balance at 31 December 2023	**8,277**	**8,277**

Other financial assets	*Stage 1*	*Total*
Not rated	209,371	209,371
Balance at 31 December 2023	**209,371**	**209,371**

Financial and performance guarantees issued	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	997,529	-	-	-	997,529
Standard grade	347,015	257	-	-	347,272
Low grade	264,715	161,350	-	-	426,065
Not rated	140,467	8	-	-	140,475
Defaulted					
Non-performing	-	-	1,915	-	1,915
Other	-	-	5,741	-	5,741
Balance at 31 December 2023	**1,749,726**	**161,615**	**7,656**	**-**	**1,918,997**

Letters of credit	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	69,260	-	-	-	69,260
Standard grade	7,546	-	-	-	7,546
Low grade	307	-	-	-	307
Not rated	432	-	-	-	432
Balance at 31 December 2023	**77,545**	**-**	**-**	**-**	**77,545**

Undrawn loan facilities	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	668,644	215	12	-	668,871
Standard grade	240,974	1,203	-	-	242,177
Low grade	23,791	6,757	-	1	30,549
Not rated	71,305	278	-	-	71,583
Defaulted					
Non-performing	-	-	1,764	7	1,771
Balance at 31 December 2023	**1,004,714**	**8,453**	**1,776**	**8**	**1,014,951**

Cash and cash equivalents, excluding cash on hand	*Stage 1*	*Stage 3*	*Total*
High grade	1,372,649	-	1,372,649
Standard grade	577,159	-	577,159
Low grade	18,466	-	18,466
Not rated	527,209	-	527,209
Balance at 31 December 2022	**2,495,483**	**-**	**2,495,483**

Amounts due from credit institutions	*Stage 1*	*Stage 3*	*Total*
High grade	2,396,898	-	2,396,898
Not rated	25,726	-	25,726
Balance at 31 December 2022	**2,422,624**	**-**	**2,422,624**

Investment securities measured at FVOCI - debt instruments	*Stage 1*	*Stage 3*	*Total*
High grade	2,337,630	-	2,337,630
Standard grade	1,546,899	-	1,546,899
Not rated	76,381	1,619	78,000
Balance at 31 December 2022	**3,960,910**	**1,619**	**3,962,529**

Investment securities measured at amortized cost - debt instruments	*Stage 1*	*Stage 3*	*Total*
High grade	129,670	-	129,670
Standard grade	197,658	-	197,658
Not rated	54,407	-	54,407
Balance at 31 December 2022	**381,735**	**-**	**381,735**

27. Risk management (continued)

Credit risk (continued)

Commercial loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	2,484,436	78,817	-	-	2,563,253
Standard grade	1,428,683	123,274	-	310	1,552,267
Low grade	231,148	388,875	-	1,187	621,210
Not rated	338,449	17,341	-	-	355,790
Defaulted					
Non-performing	-	-	169,661	14,453	184,114
Other	-	-	3,322	-	3,322
Balance at 31 December 2022	**4,482,716**	**608,307**	**172,983**	**15,950**	**5,279,956**

Residential mortgage loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	3,020,624	22,479	-	4,103	3,047,206
Standard grade	657,117	37,241	-	4,446	698,804
Low grade	107,484	108,764	-	3,402	219,650
Not rated	140,681	1,082	-	-	141,763
Defaulted					
Non-performing	-	-	53,073	13,650	66,723
Other	-	-	16,584	2,474	19,058
Balance at 31 December 2022	**3,925,906**	**169,566**	**69,657**	**28,075**	**4,193,204**

Micro and SME loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	2,025,930	43,580	-	347	2,069,857
Standard grade	1,018,480	67,959	-	361	1,086,800
Low grade	145,066	75,782	-	45	220,893
Not rated	281,213	13,142	10	207	294,572
Defaulted					
Non-performing	-	-	135,965	1,658	137,623
Other	-	-	10,542	226	10,768
Balance at 31 December 2022	**3,470,689**	**200,463**	**146,517**	**2,844**	**3,820,513**

Consumer loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	2,003,630	13,253	-	2,411	2,019,294
Standard grade	872,122	39,737	-	1,763	913,622
Low grade	202,919	159,751	-	2,021	364,691
Not rated	164,521	1,134	103	-	165,758
Defaulted					
Non-performing	-	-	70,885	11,279	82,164
Other	-	-	51,004	5,521	56,525
Balance at 31 December 2022	**3,243,192**	**213,875**	**121,992**	**22,995**	**3,602,054**

Gold – pawn loans at amortised cost	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	61,635	195	-	-	61,830
Standard grade	43,456	1,077	-	-	44,533
Low grade	39,509	7,339	-	-	46,848
Not rated	2,925	2	493	-	3,420
Defaulted					
Non-performing	-	-	1,318	-	1,318
Other	-	-	6,605	-	6,605
Balance at 31 December 2022	**147,525**	**8,613**	**8,416**	**-**	**164,554**

Finance lease receivables	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	17,702	4,495	-	-	22,197
Standard grade	-	694	-	-	694
Not rated	37,269	1,262	5,101	-	43,632
Defaulted					
Non-performing	-	-	3,779	11,909	15,688
Other	-	-	5,230	3,301	8,531
Balance at 31 December 2022	**54,971**	**6,451**	**14,110**	**15,210**	**90,742**

Factoring receivables	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	690	-	-	-	690
Standard grade	7,262	-	-	-	7,262
Low grade	7,660	3,000	-	-	10,660
Not rated	4,753	-	-	-	4,753
Defaulted					
Non-performing	-	-	35	-	35
Other	-	-	11	-	11
Balance at 31 December 2022	**20,365**	**3,000**	**46**	**-**	**23,411**

27. Risk management (continued)

Credit risk (continued)

Accounts receivable	*Stage 1*	*Stage 3*	*Total*
Not rated	4,975	-	4,975
Balance at 31 December 2022	**4,975**	**-**	**4,975**

Other financial assets	*Stage 1*	*Stage 3*	*Total*
Not rated	156,608	-	156,608
Balance at 31 December 2022	**156,608**	**-**	**156,608**

Financial and performance guarantees issued	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	1,049,817	103	-	-	1,049,920
Standard grade	241,914	4,357	-	-	246,271
Low grade	223,983	20,097	-	-	244,080
Not rated	163,278	111	-	-	163,389
Defaulted					
Other	-	-	13,648	-	13,648
Balance at 31 December 2022	**1,678,992**	**24,668**	**13,648**	**-**	**1,717,308**

Letters of credit	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	76,091	-	-	-	76,091
Standard grade	39,671	-	-	-	39,671
Not rated	547	-	-	-	547
Balance at 31 December 2022	**116,309**	**-**	**-**	**-**	**116,309**

Undrawn loan facilities	*Stage 1*	*Stage 2*	*Stage 3*	*POCI*	*Total*
High grade	498,164	306	-	-	498,470
Standard grade	259,919	6,168	-	-	266,087
Low grade	7,719	7,829	-	-	15,548
Not rated	87,136	82	-	1	87,219
Defaulted					
Non-performing	-	-	1,537	1	1,538
Other	-	-	199	-	199
Balance at 31 December 2022	**852,938**	**14,385**	**1,736**	**2**	**869,061**

27. Risk management (continued)

Credit risk (continued)

Types of collateral the Group accepts include real estate, movable properties as well as financial assets (deposits, shares and guarantees) and other registered liens. Measurement and processing of collateral is governed by generally acceptable standards and collateral-specific instructions. These transactions are structured under legally verified standard agreements where the pledges are secured through public registry where eligible. The following table shows the ratio of the loan portfolio to the market value of collateral held by the Group in respect of the portfolio. As at 31 December 2024, up to 81.9% of the collateral held has been re-valued within the last two years (31 December 2023: 80.1%, 31 December 2022: 78.6%).

	As at 31 December 2024									
	Total gross carrying amount		*Loan-to-value %*							
		Unsecured	*Less than 50%*	*50%-80%*	*80% - 90%*	*90%-100%*	*100%-200%*	*200%-300%*	*300%-400%*	*More than 400%*
Commercial loans	8,762,318	1,306,721	2,206,591	1,531,706	832,829	462,629	1,634,381	345,196	139,753	302,512
ECL Coverage	1.49%	0.57%	0.59%	1.36%	0.50%	0.24%	4.20%	0.87%	0.32%	3.79%
Residential mortgage loans	5,032,418	113,721	1,843,223	2,590,036	305,081	96,232	59,997	8,268	1,662	14,198
ECL Coverage	0.21%	0.89%	0.03%	0.13%	0.56%	1.26%	3.83%	2.62%	1.32%	0.63%
Micro and SME loans	4,441,390	136,894	1,619,172	1,588,667	400,201	278,311	392,381	14,100	6,849	4,815
ECL Coverage	1.76%	5.50%	0.28%	0.99%	1.57%	3.37%	8.33%	2.16%	11.27%	14.72%
Consumer loans	6,187,049	3,020,236	1,365,128	1,383,584	205,634	171,729	31,049	3,657	2,228	3,804
ECL Coverage	2.21%	4.08%	0.10%	0.41%	0.89%	0.71%	9.66%	5.50%	12.34%	4.02%
Gold – pawn loans	154,242	-	14,273	56,400	27,234	39,053	16,041	13	1,228	-
ECL Coverage	0.66%	N/A	0.01%	0.02%	0.01%	0.06%	0.27%	69.23%	N/A	n/a
Loans to customers at amortised cost, gross	**24,577,417**	**4,577,572**	**7,048,387**	**7,150,393**	**1,770,979**	**1,047,954**	**2,133,849**	**371,234**	**151,720**	**325,329**

	As at 31 December 2023									
	Total gross carrying amount		*Loan-to-value %*							
		Unsecured	*Less than 50%*	*50%-80%*	*80% - 90%*	*90%-100%*	*100%-200%*	*200%-300%*	*300%-400%*	*More than 400%*
Commercial loans	6,979,330	802,460	1,235,492	1,618,714	297,635	370,658	1,450,549	531,632	133,244	538,946
ECL Coverage	1.41%	0.65%	0.55%	0.42%	0.21%	2.63%	1.98%	4.45%	2.41%	2.54%
Residential mortgage loans	4,557,525	105,607	1,097,126	1,997,629	613,407	533,097	175,455	9,783	5,224	20,197
ECL Coverage	0.50%	2.22%	0.00%	0.24%	0.73%	0.78%	3.56%	1.23%	2.28%	2.09%
Micro and SME loans	4,073,022	241,068	885,575	1,131,643	358,909	314,671	981,784	82,058	26,254	51,060
ECL Coverage	1.76%	6.03%	0.01%	0.57%	0.79%	1.23%	3.85%	3.02%	4.57%	4.75%
Consumer loans	4,699,969	2,266,702	815,573	919,577	330,004	257,059	87,651	8,396	4,722	10,285
ECL Coverage	2.80%	5.16%	0.01%	0.38%	0.83%	1.10%	5.61%	3.85%	4.36%	1.62%
Gold – pawn loans	150,228	-	4,362	49,324	93,706	1,083	790	941	-	22
ECL Coverage	0.92%	N/A	0.00%	0.06%	0.24%	16.25%	27.72%	76.09%	N/A	81.82%
Loans to customers at amortised cost, gross	**20,460,074**	**3,415,837**	**4,038,128**	**5,716,887**	**1,693,661**	**1,476,568**	**2,696,229**	**632,810**	**169,444**	**620,510**

	As at 31 December 2022									
	Total gross carrying amount		*Loan-to-value %*							
		Unsecured	*Less than 50%*	*50%-80%*	*80% - 90%*	*90%-100%*	*100%-200%*	*200%-300%*	*300%-400%*	*More than 400%*
Commercial loans	5,279,956	717,363	1,002,735	900,866	158,713	245,750	1,239,811	340,917	70,694	603,107
ECL Coverage	1.69%	2.76%	0.58%	1.18%	0.82%	1.56%	2.99%	1.18%	1.31%	1.01%
Residential mortgage loans	4,193,204	120,440	981,034	1,859,064	532,412	441,719	230,274	8,114	2,665	17,482
ECL Coverage	0.72%	2.45%	0.01%	0.38%	1.00%	1.45%	3.07%	4.42%	1.43%	4.06%
Micro and SME loans	3,820,513	399,853	885,724	966,056	278,684	280,462	800,119	73,083	30,447	106,085
ECL Coverage	1.66%	4.79%	0.02%	0.41%	0.92%	1.48%	2.92%	3.42%	4.59%	5.88%
Consumer loans	3,602,054	1,794,034	629,846	694,153	217,045	174,755	83,286	4,926	1,196	2,813
ECL Coverage	3.76%	6.79%	0.03%	0.51%	1.36%	1.59%	4.58%	7.69%	0.92%	1.53%
Gold – pawn loans	164,554	-	8,590	58,481	94,082	2,044	1,338	-	-	19
ECL Coverage	3.31%	N/A	50.52%	0.07%	0.30%	13.65%	35.87%	n/a	N/A	84.21%
Loans to customers at amortised cost, gross	**17,060,281**	**3,031,690**	**3,507,929**	**4,478,620**	**1,280,936**	**1,144,730**	**2,354,828**	**427,040**	**105,002**	**729,506**

Carrying amount per class of financial assets whose terms have been renegotiated

27. Risk management (continued)

Credit risk (continued)

During the year, the Group modified the contractual cash flows on certain loans and advances to customers. All such loans had previously been transferred to at least Stage 2, with a loss allowance measured at an amount equal to lifetime ECLs.

The following table provides information on financial assets that were modified while they had a loss allowance measured at an amount equal to lifetime ECL:

Financial assets modified during 2024:	Amortised cost before modification	Net gain (loss) arising from modification
Commercial loans	595,934	(1,292)
Residential mortgage loans	52,254	980
Micro and SME loans	228,178	(1,511)
Consumer loans	330,820	(4,880)
Gold – pawn loans	-	-
Loans to customers	**1,207,186**	**(6,703)**
Receivables from factoring	-	-
Finance lease receivables	-	-
Total loans to customers, factoring and finance lease receivables	**1,207,186**	**(6,703)**

Financial assets modified during 2023:	Amortised cost before modification	Net gain (loss) arising from modification
Commercial loans	710,073	599
Residential mortgage loans	44,848	(131)
Micro and SME loans	168,593	(2,362)
Consumer loans	287,667	(12,791)
Gold – pawn loans	-	-
Loans to customers	**1,211,181**	**(14,685)**
Finance lease receivables	839	138
Total loans to customers, factoring and finance lease receivables	**1,212,020**	**(14,547)**

Financial assets modified during 2022:	Amortised cost before modification	Net gain (loss) arising from modification
Commercial loans	621,067	2,169
Residential mortgage loans	73,863	(3,081)
Micro and SME loans	173,382	(2,524)
Consumer loans	305,726	(25,835)
Gold – pawn loans	-	-
Loans to customers	**1,174,038**	**(29,271)**
Finance lease receivables	-	-
Total loans to customers, factoring and finance lease receivables	**1,174,038**	**(29,271)**

27. Risk management (continued)

Credit risk (continued)

The gross carrying value of loans that have previously been modified (when they were in Stage 2 or 3) which are now categorised as Stage 1, with loss allowance measured at an amount equal to 12 months expected losses, are shown in the table below:

Financial assets modified since initial recognition, as at 31 December 2024	**Gross Carrying Amount**	**Corresponding ECL**
Commercial loans	49,381	(369)
Residential mortgage loans	53,534	(19)
Micro and SME loans	35,161	(169)
Consumer loans	10,132	(109)
Gold – pawn loans	-	-
Loans to customers	**148,208**	**(666)**
Receivables from factoring	-	-
Finance lease receivables	-	-
Total loans to customers, factoring and finance lease receivables	**148,208**	**(666)**

Financial assets modified since initial recognition, as at 31 December 2023	**Gross Carrying Amount**	**Corresponding ECL**
Commercial loans	96,127	(255)
Residential mortgage loans	63,193	(51)
Micro and SME loans	39,912	(98)
Consumer loans	14,217	(49)
Gold – pawn loans	-	-
Loans to customers	**213,449**	**(453)**
Finance lease receivables	-	-
Total loans to customers, factoring and finance lease receivables	**213,449**	**(453)**

Financial assets modified since initial recognition, as at 31 December 2022	**Gross Carrying Amount**	**Corresponding ECL**
Commercial loans	10,100	(24)
Residential mortgage loans	72,919	(104)
Micro and SME loans	40,925	(129)
Consumer loans	19,482	(204)
Gold – pawn loans	-	-
Loans to customers	**143,426**	**(461)**
Finance lease receivables	-	-
Total loans to customers, factoring and finance lease receivables	**143,426**	**(461)**

27. Risk management (continued)

Credit risk (continued)

The geographical concentration of the Group's assets and liabilities is set out below:

	2024			
	Georgia	*OECD*	*Other foreign countries*	*Total*
Assets:				
Cash and cash equivalents	959,205	711,548	607,723	2,278,476
Amounts due from credit institutions	2,423,727	-	32,963	2,456,690
Investment securities	3,650,495	3,569,057	607,238	7,826,790
Investment securities pledged under sale and repurchase agreements and securities lending	-	138,945	-	138,945
Loans to customers, factoring and finance lease receivables	23,537,615	18,484	760,056	24,316,155
Accounts receivables and other loans	1,622	-	1,168	2,790
All other assets	1,494,430	126,009	632,878	2,253,317
	32,067,094	**4,564,043**	**2,642,026**	**39,273,163**
Liabilities:				
Client deposits and notes	19,138,210	1,212,819	4,990,704	25,341,733
Amounts owed to credit institutions	2,981,341	2,963,364	765,789	6,710,494
Debt securities issued	942,211	140,620	16,506	1,099,337
Lease Liability	162,827	-	14,538	177,365
All other liabilities	261,672	33,311	18,753	313,736
	23,486,261	**4,350,114**	**5,806,290**	**33,642,665**
Net balance sheet position	**8,580,833**	**213,929**	**(3,164,264)**	**5,630,498**

	2023				2022			
	Georgia	*OECD*	*Other foreign countries*	*Total*	*Georgia*	*OECD*	*Other foreign countries*	*Total*
Assets:								
Cash and cash equivalents	1,465,026	974,224	603,582	3,042,832	1,419,835	1,453,123	622,770	3,495,728
Amounts due from credit institutions	1,733,899	-	18,759	1,752,658	2,342,829	54,175	20,302	2,417,306
Investment securities	2,194,483	2,258,203	428,129	4,880,815	1,792,192	2,436,465	115,092	4,343,749
Loans to customers, factoring and finance lease receivables	19,531,162	16,987	699,918	20,248,067	16,303,440	16,340	521,823	16,841,603
All other assets	1,246,815	146,974	75,949	1,469,738	1,070,174	119,933	78,565	1,268,672
	26,171,385	**3,396,388**	**1,826,337**	**31,394,110**	**22,928,470**	**4,080,036**	**1,358,552**	**28,367,058**
Liabilities:								
Client deposits and notes	15,083,091	1,189,517	4,504,208	20,776,816	13,018,270	978,029	4,277,762	18,274,061
Amounts owed to credit institutions	2,369,365	2,234,149	529,515	5,133,029	2,622,788	2,066,922	501,784	5,191,494
Debt securities issued	273,923	147,436	-	421,359	312,258	333,879	-	646,137
Lease Liability	124,345	-	13,209	137,554	99,556	-	13,068	112,624
All other liabilities	381,722	79,352	12,228	473,302	268,425	79,321	7,628	355,374
	18,232,446	**3,650,454**	**5,059,160**	**26,942,060**	**16,321,297**	**3,458,151**	**4,800,242**	**24,579,690**
Net balance sheet position	**7,938,939**	**(254,066)**	**(3,232,823)**	**4,452,050**	**6,607,173**	**621,885**	**(3,441,690)**	**3,787,368**

Liquidity risk and funding management

Liquidity risk is the risk that the Group 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 regular 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 Group maintains a portfolio of highly marketable and diverse assets that can be easily liquidated in the event of an unforeseen interruption of cash flow. The Group also has committed lines of credit that it can access to meet liquidity needs. In addition, the Group maintains a cash deposit (obligatory reserve) with the NBG, the amount of which depends on the level of customer funds attracted.

The liquidity position is assessed and managed by the Group primarily on a standalone Bank basis, based on certain liquidity ratios established by the NBG. The banks are required to maintain a liquidity coverage ratio, which is defined as the ratio of high-quality liquid assets to net cash outflow over the next 30 days. The order requires that, absent a stress-period, the value of the ratio be no lower than 100%. The liquidity coverage ratio as at 31 December 2024 was 138.6% (2023: 125.2%, 2022: 132.4%).

The Bank holds a comfortable buffer on top of Net Stable Funding Ratio (NSFR) requirement of 100%, which came into effect on 1 September 2019. A solid buffer over NSFR provides stable funding sources over a longer time span. This approach is designed to ensure that the funding framework is sufficiently flexible to secure liquidity under a wide range of market conditions. NSFR as at 31 December 2023 was 130.7%, (2022: 130.4%, 2021: 131.9%), all comfortably above the NBG's minimum regulatory requirements.

The Group also matches the maturity of financial assets and financial liabilities and regularly monitors negative gaps compared with the Bank's standalone total regulatory capital calculated per NBG regulation.

27. Risk management (continued)

Liquidity risk and funding management (continued)

The table below summarises the maturity profile of the Group's financial liabilities based on contractual undiscounted repayment obligations, except for other liabilities, which are presented at carrying amounts due to the short-term nature of these liabilities. Repayments that are subject to notice are treated as if notice were to be given immediately. However, the Group 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 As at 31 December 2024	***Less than 3 months***	***3 to 12 months***	***1 to 5 years***	***Over 5 years***	***Total***
Client deposits and notes	9,504,361	14,107,535	2,422,975	79,685	26,114,556
Amounts owed to credit institutions	3,703,132	962,480	2,277,150	403,458	7,346,220
Debt securities issued	13,744	157,020	1,181,070	140,620	1,492,454
Lease liability	11,026	32,495	106,325	40,522	190,368
Derivative financial liabilities	2,776	980	1,877	-	5,633
Other liabilities	141,582	724	1,281	109	143,696
Total undiscounted financial liabilities	**13,376,621**	**15,261,234**	**5,990,678**	**664,394**	**35,292,927**

Financial liabilities As at 31 December 2023	***Less than 3 months***	***3 to 12 months***	***1 to 5 years***	***Over 5 years***	***Total***
Client deposits and notes	8,744,192	10,559,751	1,964,484	73,382	21,341,809
Amounts owed to credit institutions	2,777,141	560,049	1,756,366	836,493	5,930,049
Debt securities issued	406	40,986	374,564	83,158	499,114
Lease liability	8,990	26,372	96,425	26,499	158,286
Derivative financial liabilities	12,300	12,302	1,177	-	25,779
Other liabilities	122,013	730	1,192	133	124,068
Total undiscounted financial liabilities	**11,665,042**	**11,200,190**	**4,194,208**	**1,019,665**	**28,079,105**

Financial liabilities As at 31 December 2022	***Less than 3 months***	***3 to 12 months***	***1 to 5 years***	***Over 5 years***	***Total***
Client deposits and notes	8,311,907	8,362,015	1,951,705	342,592	18,968,219
Amounts owed to credit institutions	3,380,461	570,588	1,284,397	654,002	5,889,448
Debt securities issued	7,849	343,213	411,265	-	762,327
Lease liability	7,458	21,841	76,111	16,756	122,166
Derivative financial liabilities	43,876	14,401	743	-	59,020
Other liabilities	93,799	367	287	118	94,571
Total undiscounted financial liabilities	**11,845,350**	**9,312,425**	**3,724,508**	**1,013,468**	**25,895,751**

The table below shows the contractual expiry by maturity of the Group's financial commitments and contingencies which can contractually be called within 3 months.

	Less than 3 months	***3 to 12 months***	***1 to 5 years***	***Over 5 years***	***Total***
31 December 2024	1,283,060	771,430	960,099	42,173	3,056,762
31 December 2023	1,349,928	634,601	1,006,963	27,560	3,019,052
31 December 2022	1,280,906	623,036	775,683	29,843	2,709,468

The Group expects that not all guarantees or commitments will be drawn before expiry of the commitment.

The maturity analysis does not reflect the historical stability of current accounts. Their liquidation has historically taken place over a longer period than indicated in the tables above. These balances are included in amounts due in less than three months in the tables above.

27. Risk management (continued)

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 Group classifies exposures to market risk into either trading or non-trading portfolios. Trading and non-trading positions are managed and monitored using sensitivity analysis.

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 following table demonstrates the sensitivity to a reasonably possible change in interest rates, with all other variables held constant, on the Group's consolidated income statement.

The sensitivity of the consolidated income statement is the effect of the assumed changes in interest rates on the net interest income for the year, based on the floating rate non-trading financial assets and financial liabilities held at 31 December 2024. Changes in basis points are calculated as standard deviations of daily changes in floating rates over the last month multiplied by respective floating rates. During the years ended 31 December 2024, 2023 and 2022**,** sensitivity analysis did not reveal any significant potential effect on the Group's equity.

Currency	*Increase in basis points* *2024*	*Sensitivity of net interest income* *2024*	*Sensitivity of other comprehensive income* *2024*
GEL	21	5,116	3,933
EUR	10	358	-
USD	14	1,179	2,565

Currency	*Decrease in basis points* *2024*	*Sensitivity of net interest income* *2024*	*Sensitivity of other comprehensive income* *2024*
GEL	21	(5,116)	(3,933)
EUR	10	(358)	-
USD	14	(1,179)	(2,565)

Currency	*Increase in basis points* *2023*	*Sensitivity of net interest income* *2023*	*Sensitivity of other comprehensive income* *2023*
GEL	22	6,541	2,289
EUR	8	707	2
USD	12	813	101

Currency	*Decrease in basis points* *2023*	*Sensitivity of net interest income* *2023*	*Sensitivity of other comprehensive income* *2023*
GEL	22	(6,541)	(2,289)
EUR	8	(707)	(2)
USD	12	(813)	(101)

27. Risk management (continued)

Market risk (continued)

Currency	*Increase in basis points* *2022*	*Sensitivity of net interest income* *2022*	*Sensitivity of other comprehensive income* *2022*
GEL	14	2,432	1,348
EUR	24	3,732	107
USD	21	1,624	1,022

Currency	*Decrease in basis points* *2022*	*Sensitivity of net interest income* *2022*	*Sensitivity of other comprehensive income* *2022*
GEL	14	(2,432)	(1,348)
EUR	24	(3,732)	(107)
USD	21	(1,624)	(1,022)

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 NBG regulations. Positions are monitored daily.

The tables below indicate the currencies to which the Group had significant exposure at 31 December 2024 on its monetary assets and liabilities. The analysis calculates the effect of a reasonably possible movement of the currency rate against the Georgian Lari, with all other variables held constant on the income statement. The reasonably possible movement of the currency rate against the Georgian Lari is calculated as a standard deviation of daily changes in exchange rates over the 12 months. A negative amount in the table reflects a potential net reduction in income statement or equity, while a positive amount reflects a net potential increase. During the year ended 31 December 2024, year ended 31 December 2023 and year ended 31 December 2022, sensitivity analysis did not reveal any significant potential effect on the Group's equity.

Currency	*Change in currency rate in %*	*Effect on profit before tax*	*Change in currency rate in %*	*Effect on profit before tax*	*Change in currency rate in %*	*Effect on profit before tax*
	2024		*2023*		*2022*	
EUR	8.7%	(2,213)	8.8%	(400)	13.4%	1,179
USD	6.8%	(6,410)	4.9%	1,511	10.9%	4,018

Prepayment risk

Prepayment risk is the risk that the Group will incur a financial loss because its customers and counterparties repay or request repayment earlier than expected, such as fixed rate mortgages when interest rates fall, or other credit facilities, for similar reasons.

The Group calculates the effect of early repayments by calculating the weighted average rates of early repayments across each loan product individually, applying these historical rates to the outstanding carrying amount of respective products as at the reporting date and multiplying by the weighted average effective annual interest rates for each product. The model does not make a distinction between different reasons for repayment (e.g. relocation, refinancing and renegotiation) and takes into account the effect of any prepayment penalties on the Group's income.

27. Risk management (continued)

Market risk (continued)

The estimated effect of prepayment risk on net interest income of the Group for the years ended 31 December 2024, 31 December 2023 and 31 December 2022, is as follows:

	Effect on net interest income
2024	(115,232)
2023	(71,177)
2022	(51,899)

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 Group cannot expect to eliminate all operational risks, but through a control framework and by monitoring and responding to potential risks, the Group is able to manage the risks. Controls include effective segregation of duties, access, authorisation and reconciliation procedures, staff education and assessment processes, including the use of Internal Audit.

Cyber risk, AML and compliance risk

Information-security threats have continued to increase over the past few years and the Group has seen a number of major organisations subject to cyber-attacks. Fortunately, the Group's operations have not been materially affected and the Group has not suffered a data breach. Over the past few years, as the Group's operations have expanded and the focus has been directed towards more digitalisation of banking products and services, there has been seen an increase in electronic crimes, including fraud, although losses have not been significant. Money laundering (ML) and Terrorism financing (FT) risks, which the Bank has measures in place to guard against, continue to evolve globally. The Bank continues to face stringent regulatory and supervisory requirements related to the fight against ML/TF. Failure to comply with these requirements may lead to enforcement action by the regulator, which can result in a pecuniary penalty and negatively impact the Group's reputation.
The Group cannot expect to eliminate all operational risks, but through a control framework and by monitoring and responding to potential risks, the Group is able to manage the risks. Controls include effective segregation of duties, access, authorisation and reconciliation procedures, staff education and assessment processes, including the use of internal audit.

Operating environment

Most of the Group's business is concentrated in Georgia which, as developing economy lacks the well-established business and regulatory infrastructure typically found in more mature markets. Consequently, operations in this region involves risks not generally encountered in developed economies. These include the limited convertibility of the Georgian Lari and underdeveloped debt and equity markets. Moreover, as Georgia is small open economy, it is significantly exposed to global and regional disruption. Political uncertainty, such as the one following Georgia's October 2024 parliamentary elections, could impact consumer and business sentiment, potentially leading to weaker economic growth and GEL depreciation.

Despite these risks, Georgia has improved its investment climate over the past decade. Key reforms in banking, judicial, taxation, and regulatory systems, including updated tax codes and procedural laws, has contributed to a more favourable business environment. The Board views these reforms as reducing the risks of operating in these countries. Furthermore, Georgia has demonstrated sound macroeconomic management, with prudent monetary policies and fiscal discipline in place to mitigate potential adverse effects.

The trend of improving business conditions is expected to continue, with the future stability of the economies relying on effective government policies and reforms, alongside regional and global developments.

Regional instability

The Georgian economy is well-diversified and there is no significant dependency on a single country. However, it is dependent on economies of the region, in particular Russia, Turkey, Azerbaijan and Armenia, which are key trading partners. There has been ongoing geopolitical tension, political and economic instability and military conflict in the region, which may have an adverse effect on the Group's business and financial position.

The Group actively monitors regional and local market conditions and risks related to political instability, and the Georgian Government's response thereto. It performs stress and scenario tests in order to assess the impact on its financial position, and develops responsive strategies and action plans. While financial market turbulences and geopolitical tensions affect regional trading partners, Georgia's preferential trading regimes and well-diversified economy in terms of dependency on a single country, support the country to enhance resilience to regional external shocks.

27. Risk management (continued)

Capital risk

The Bank faces the risk of not meeting the minimum capital adequacy requirements set by the NBG. The Bank, like all regulated financial institutions in Georgia, is required to comply with certain capital adequacy ratios set by the NBG. The failure to maintain the minimum capital adequacy requirements may have a material adverse effect on the Group and may compromise its strategic targets.

The Group maintains an actively managed capital base to cover risks inherent to its business. As part of its capital adequacy management framework, the Group continuously monitors market conditions and review market changes, and performs stress and scenario testing to test its position under adverse economic conditions, market and regulatory developments. Capital position is continuously monitored by the management, as well as the Board, to ensure prudent management and timely actions, when necessary. For further details, please refer to Note 31.

Emerging risks

The Group continues to monitor and assess emerging risks, with climate risk remaining a key focus since its identification in 2021. Recognizing the evolving and complex nature of climate-related risks, the Group enhanced its assessment approach in 2024, transitioning from qualitative to quantitative analysis, with a particular emphasis on credit risk. This year's focus was on understanding inherent risks from both physical and transition factors and evaluating potential financial impacts across the Group's portfolio. For the remaining prudential risk categories—liquidity, capital, market, operational, and reputational—the Group conducted qualitative analyses to explore how climate change could drive risks under different scenarios.

The Group's materiality analysis on credit risk, completed as of 31 December 2024, assessed exposures to physical and transition risks over a medium-term horizon (2040), aligned with loan maturities. The findings highlighted drought as the most significant physical risk under the SSP5-8.5 scenario, particularly impacting agriculture clients. Heatwaves and floods also emerged as notable risks, though with less severity. On the transition risk side, the Delayed Transition scenario revealed the highest exposures, primarily concentrated in the manufacturing sector, driven by potential indirect emission costs. High-emitting sectors are particularly vulnerable under this scenario due to abrupt policy shifts that could lead to substantial increases in carbon costs.

To better understand how these risks may evolve, the Group conducted scenario analyses focusing on SSP5-8.5 and Delayed Transition pathways. Physical risks under SSP5-8.5 were assessed for both short-term (2030) and long-term (2050) horizons, revealing a significant escalation over time, primarily due to increasing drought and heatwave events. Transition risks under the Delayed Transition scenario are expected to rise sharply over the long term, while short-term impacts remain limited.

While climate change is not currently considered a material factor in the credit assessment of individual clients, the Group plans to expand climate data collection, particularly for high-carbon-intensive sectors. This includes gathering information on GHG emissions, decarbonization plans, and asset-level location data to enhance future risk analysis.

Retail client exposure to climate-related risks was not included in this year's materiality analysis. Assessments for this segment are planned for future analysis to better understand potential exposures to both physical and transition risks.

As of 31 December 2024, management does not consider climate-related risks to have a material impact on the Group's critical judgments and estimates in the short to medium term. Consequently, no adjustments have been made to provisions related to climate risk. The Bank will continue its analysis through ongoing climate stress testing to further refine risk assessments and evaluate future adjustments as necessary.

The Group has disclosed climate-related risks in line with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations, detailed on page 30.

28. Fair value measurements

Fair value hierarchy

For the purpose of fair value disclosures, the Group has determined classes of assets and liabilities on the basis of the nature, characteristics and risks of the asset or liability. The following tables show analysis of assets and liabilities measured at fair value or for which fair values are disclosed by level of the fair value hierarchy:

At 31 December 2024	*Level 1*	*Level 2*	*Level 3*	*Total*
Assets measured at fair value				
Total investment properties	-	-	140,737	140,737
Land	-	-	*13,204*	*13,204*
Residential properties	-	-	*86,388*	*86,388*
Non-residential properties	-	-	*41,145*	*41,145*
Investment securities measured at FVOCI	1,741,927	4,174,276	108	5,916,311
Investment securities pledged under sale and repurchase agreements and securities lending measured at FVOCI	-	138,945	-	138,945
Other assets – derivative financial assets	-	24,186	-	24,186
Assets for which fair values are disclosed				
Investment securities measured at amortised cost - debt instruments	-	1,919,326	-	1,919,326
Loans to customers, factoring and finance lease receivables at amortised cost	-	-	23,378,952	23,378,952
Accounts receivables and other loans	-	2,790	-	2,790
Liabilities measured at fair value				
Other liabilities – derivative financial liabilities	-	5,633	-	5,633
Liabilities for which fair values are disclosed				
Client deposits and notes	-	25,362,177	-	25,362,177
Amounts owed to credit institutions	-	5,534,464	1,151,799	6,686,263
Debt securities issued	-	823,608	249,641	1,073,249
Lease liability	-	14,538	163,854	178,392

At 31 December 2023	*Level 1*	*Level 2*	*Level 3*	*Total*
Assets measured at fair value				
Total investment properties	-	-	127,924	127,924
Land	-	-	*4,844*	*4,844*
Residential properties	-	-	*87,758*	*87,758*
Non-residential properties	-	-	*35,322*	*35,322*
Investment securities measured at FVOCI	6,944	4,349,655	108	4,356,707
Other assets – derivative financial assets	-	10,942	-	10,942
Assets for which fair values are disclosed				
Investment securities measured at amortised cost - debt instruments	-	528,032	-	528,032
Loans to customers, factoring and finance lease receivables at amortised cost	-	-	19,491,361	19,491,361
Liabilities measured at fair value				
Other liabilities – derivative financial liabilities	-	25,779	-	25,779
Liabilities for which fair values are disclosed				
Client deposits and notes	-	20,796,389	-	20,796,389
Amounts owed to credit institutions	-	3,752,208	1,376,804	5,129,012
Debt securities issued	-	270,524	148,134	418,658
Lease liability	-	13,209	125,856	139,065

28. Fair value measurements (continued)

Fair value hierarchy (continued)

At 31 December 2022	*Level 1*	*Level 2*	*Level 3*	*Total*
Assets measured at fair value				
Total investment properties	-	-	170,629	170,629
Land	-	-	*9,009*	*9,009*
Residential properties	-	-	*112,890*	*112,890*
Non-residential properties	-	-	*48,730*	*48,730*
Investment securities measured at FVOCI	4,744	3,960,360	108	3,965,212
Other assets – derivative financial assets	-	39,270	-	39,270
Assets for which fair values are disclosed				
Investment securities measured at amortised cost - debt instruments	-	385,800	-	385,800
Loans to customers, factoring and finance lease receivables at amortised cost	-	-	16,246,726	16,246,726
Liabilities measured at fair value				
Other liabilities – derivative financial liabilities	-	59,020	-	59,020
Liabilities for which fair values are disclosed				
Client deposits and notes	-	18,241,016	-	18,241,016
Amounts owed to credit institutions	-	3,974,909	1,192,800	5,167,709
Debt securities issued	-	490,691	151,845	642,536
Lease liability	-	13,068	102,825	115,893

The description of the valuation technique and the description of inputs used in the fair value measurement for level 2 measurements:

	Fair value at 31 December				
Assets carried at fair value	**2024**	**2023**	**2022**	**Valuation technique**	**Inputs used**
Investment securities - Debt instruments	4,174,276	4,349,655	3,960,360	Discounted cash flows ("DCF")	Government bonds yield curve, Tbilisi interbank interest rate ("TIBR Index")
Investment securities pledged under sale and repurchase agreements and securities lending - Debt instruments	138,945	-	-	Discounted cash flows ("DCF")	Government bonds yield curve, Tbilisi interbank interest rate ("TIBR Index")
derivative financial assets	24,186	10,942	39,270	forward pricing and swap models, using present value calculations and standard option pricing models	credit quality of counterparties, foreign exchange spot and forward rates, interest rate curves and implied volatilities
Total assets recurring fair value measurements at level 2	**4,337,407**	**4,360,597**	**3,999,630**		
Liabilities carried at fair value					
derivative financial liabilities	5,633	25,779	59,020	forward pricing and swap models, using present value calculations and standard option pricing models	credit quality of counterparties, foreign exchange spot and forward rates, interest rate curves and implied volatilities
Total liabilities recurring fair value measurements at level 2	**5,633**	**25,779**	**59,020**		

The following is a description of the determination of fair value for financial instruments which are recorded at fair value using valuation techniques. These incorporate the Group's estimate of assumptions that a market participant would make when valuing the instruments.

28. Fair value measurements (continued)

Fair value hierarchy (continued)

Derivative financial instruments

Derivative financial instruments valued using a valuation technique with market observable inputs are mainly interest rate swaps, currency swaps, forward foreign exchange contracts and option contracts. The most frequently applied valuation techniques include forward pricing and swap models, using present value calculations, as well as standard option pricing models. The models incorporate various inputs including the credit quality of counterparties, foreign exchange spot and forward rates, interest rate curves and implied volatilities.

Investment securities

Investment securities consist of equity and debt securities and are valued using a valuation technique or pricing models. These securities are valued using models which sometimes only incorporate data observable in the market and at other times use both observable and non-observable data. For quoted investments, respective quoted prices from Bloomberg or other relevant sources are used, when for unquoted investments FV is calculated based on future cash flow expected discounted at current rate for new instruments with similar credit risk, remaining maturity and other characteristics.

Assets and liabilities not measured at fair value but for which fair value is disclosed

The fair values in the level 2 and level 3 of the fair value hierarchy are estimated using the discounted cash flows valuation technique. Current interest rates for new instruments with similar credit risk, currency and remaining maturity is used as discount rate in the valuation model.

Transfer to Level 1

There were no transfers from level 2 to level 1.

Movements in Level 3 non-financial assets measured at fair value

All investment properties are Level 3. Reconciliations of their opening and closing amounts are provided in Note 11.

Description of significant unobservable inputs to valuations of non-financial assets

The following tables show descriptions of significant unobservable inputs to Level 3 valuations of investment properties:

	31 December		Significant unobservable			Weighted				Weighted
	2024	Valuation technique	inputs	MIN	MAX	average	Other key information	MIN	MAX	Average
Investment property	**140,737**									
Land	13,204									
Development land	12,766	Market approach	Price per square metre	0.033	2.859	2.214	Square metres, land	32	3,808	3,080
Agricultural land	438	Market approach	Price per square metre	0.012	0.096	0.046	Square metres, land	768	4,451	2,774
Residential properties	86,388	Market approach	Price per square metre	0.028	6.575	0.956	Square metres, building	18	989	205
Non-residential properties	41,145									
	19,605	Market approach	Price of the property	10	3,822	2,033	Square metres,Land	50	23,884	1,876
							Square metres,Building	17	2,626	1,528
	17,685	Income approach	Rent per square metre	0.0105	0.0680	0.0629	Square metres,Building	226	1,084	972
			Occupancy rate	70.0%	90.0%	83.8%				
	3,855	Cost approach	Depreciated replacement cost per square metre	0.08	3.97	0.981	Square metres, building	54	1,736	918

**** Price, rate and cost of unobservable inputs in this table are presented in Georgian Lari ("GEL"), unless otherwise indicated.***

28. Fair value measurements (continued)

Financial instruments overview

Set out below is an overview measurement categories of financial instruments held by the Group as at 31 December 2024, 31 December 2023 and 31 December 2022:

	At 31 December 2024		
	Amortised cost	*Fair value through OCI*	*Fair value through profit or loss*
Financial assets			
Cash and cash equivalents	2,278,476	-	-
Amounts due from credit institutions	2,456,690	-	-
Loans to customers, factoring and finance lease receivables	24,316,155	-	-
Accounts receivable and other loans	2,790	-	-
Investment securities - equity instruments	-	9,029	-
Investment securities - debt instruments	1,910,479	5,907,282	-
Investment securities pledged under sale and repurchase agreements and securities lending - debt instruments	-	138,945	-
Foreign currency derivative financial instruments	-	-	24,186
Total	**30,964,590**	**6,055,256**	**24,186**
Financial liabilities			
Client deposits and notes	25,341,733	-	-
Amounts owed to credit institutions	6,710,494	-	-
Debt securities issued	1,099,337	-	-
Lease liability	177,365	-	-
Trade and other payables (in other liabilities)	88,269	-	-
Foreign currency derivative financial instruments	-	-	5,633
Total	**33,417,198**	**-**	**5,633**

	At 31 December 2023			*At 31 December 2022*		
	Amortised cost	*Fair value through OCI*	*Fair value through profit or loss*	*Amortised cost*	*Fair value through OCI*	*Fair value through profit or loss*
Financial assets						
Cash and cash equivalents	3,042,832	-	-	3,495,728	-	-
Amounts due from credit institutions	1,752,658	-	-	2,417,306	-	-
Loans to customers, factoring and finance lease receivables	20,248,067	-	-	16,841,603	-	-
Accounts receivable and other loans	3,530	-	-	3,398	-	-
Investment securities - equity instruments	-	7,098	-	-	4,912	-
Investment securities - debt instruments	524,108	4,349,609	-	378,537	3,960,300	-
Interest rate contracts	-	-	-	-	-	348
Foreign currency derivative financial instruments	-	-	10,942	-	-	38,922
Total	**25,571,195**	**4,356,707**	**10,942**	**23,136,572**	**3,965,212**	**39,270**
Financial liabilities						
Client deposits and notes	20,776,816	-	-	18,274,061	-	-
Amounts owed to credit institutions	5,133,029	-	-	5,191,494	-	-
Debt securities issued	421,359	-	-	646,137	-	-
Lease liability	137,554	-	-	112,624	-	-
Trade and other payables (in other liabilities)	104,874	-	-	67,148	-	-
Foreign currency derivative financial instruments	-	-	25,779	-	-	59,020
Total	**26,573,632**	**-**	**25,779**	**24,291,464**	**-**	**59,020**

28. Fair value measurements (continued)

Financial instruments overview (continued)

Fair value of financial instruments that are carried in the financial statements not at fair value

Set out below is a comparison by class of the carrying amounts and fair values of the Group's financial instruments that are carried in the financial statements. The table does not include the fair values of non-financial assets and non-financial liabilities, fair values of other smaller financial assets and financial liabilities fair values of which are materially close to their carrying values.

	At 31 December 2024		
	Carrying value	*Fair value*	*Unrecognised gain (loss)*
Financial assets			
Investment securities measured at amortised cost - debt instruments	1,910,479	1,919,326	8,847
Loans to customers, factoring and finance lease receivables at amortised cost	24,316,155	23,378,952	(937,203)
Financial liabilities			
Client deposits and notes	25,341,733	25,362,177	(20,444)
Amounts owed to credit institutions	6,710,494	6,686,263	24,231
Debt securities issued	1,099,337	1,073,249	26,088
Lease liability	177,365	178,392	(1,027)
Total unrecognised change in unrealised fair value			**(899,508)**

	At 31 December 2023			*At 31 December 2022*		
	Carrying value	*Fair value*	*Unrecognised gain (loss)*	*Carrying value*	*Fair value*	*Unrecognised gain (loss)*
Financial assets						
Investment securities measured at amortised cost - debt instruments	524,108	528,032	3,924	378,537	385,800	7,263
Loans to customers, factoring and finance lease receivables at amortised cost	20,248,067	19,491,361	(756,706)	16,841,603	16,246,726	(594,877)
Financial liabilities						
Client deposits and notes	20,776,816	20,796,389	(19,573)	18,274,061	18,241,016	33,045
Amounts owed to credit institutions	5,133,029	5,129,012	4,017	5,191,494	5,167,709	23,785
Debt securities issued	421,359	418,658	2,701	646,137	642,536	3,601
Lease liability	137,554	139,065	(1,511)	112,624	115,893	(3,269)
Total unrecognised change in unrealised fair value			**(767,148)**			**(530,452)**

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

Assets for which fair value approximates carrying value

For financial assets and financial liabilities that are liquid or have a short-term maturity (less than three months), it is assumed that the carrying amounts approximate to their fair value. This assumption is also applied to demand deposits, savings accounts without a specific maturity, and variable rate financial instruments.

Fixed rate financial instruments

The fair value of fixed rate financial assets and liabilities carried at amortised cost are estimated by comparing market interest rates when they were first recognised with current market rates offered for similar financial instruments. The estimated fair value of fixed interest-bearing deposits is based on discounted cash flows using prevailing money-market interest rates for debts with similar credit risk and maturity. For financial assets and financial liabilities maturing in less than a year, it is assumed that the carrying amounts approximate to their fair value.

29. Maturity analysis of financial assets and liabilities

The table below shows an analysis of financial assets and liabilities according to their contractual maturities, except for current accounts and credit card loans as described below. See Note 27 "Risk management" for the Group's contractual undiscounted repayment obligations.

	At 31 December 2024							
	On demand	*Up to 3 months*	*Up to 6 months*	*Up to 1 year*	*Up to 3 years*	*Up to 5 years*	*Over 5 years*	*Total*
Financial assets								
Cash and cash equivalents	1,997,498	280,978	-	-	-	-	-	2,278,476
Amounts due from credit institutions	2,423,727	-	-	-	-	-	32,963	2,456,690
Investment securities	2,552,077	3,702,713	698,220	385,733	169,982	291,347	26,718	7,826,790
Investment securities pledged under sale and repurchase agreements and securities lending	-	111,228	27,717	-	-	-	-	138,945
Loans to customers, factoring and finance lease receivables	108	4,194,642	1,827,228	3,221,976	6,382,200	3,427,788	5,262,213	24,316,155
Accounts receivable and other loans	-	2,785	-	5	-	-	-	2,790
Total	**6,973,410**	**8,292,346**	**2,553,165**	**3,607,714**	**6,552,182**	**3,719,135**	**5,321,894**	**37,019,846**
Financial liabilities								
Client deposits and notes	4,173,222	5,283,691	2,141,956	11,800,831	1,186,632	696,799	58,602	25,341,733
Amounts owed to credit institutions	557,385	3,145,071	332,163	597,838	1,148,681	689,786	239,570	6,710,494
Debt securities issued	-	13,733	38,907	114,017	134,693	657,367	140,620	1,099,337
Lease liability	-	10,878	10,685	21,296	65,382	33,393	35,731	177,365
Total	**4,730,607**	**8,453,373**	**2,523,711**	**12,533,982**	**2,535,388**	**2,077,345**	**474,523**	**33,328,929**
Net	**2,242,803**	**(161,027)**	**29,454**	**(8,926,268)**	**4,016,794**	**1,641,790**	**4,847,371**	**3,690,917**
Accumulated gap	**2,242,803**	**2,081,776**	**2,111,230**	**(6,815,038)**	**(2,798,244)**	**(1,156,454)**	**3,690,917**	

	At 31 December 2023							
	On demand	*Up to 3 months*	*Up to 6 months*	*Up to 1 year*	*Up to 3 years*	*Up to 5 years*	*Over 5 years*	*Total*
Financial assets								
Cash and cash equivalents	2,358,521	684,311	-	-	-	-	-	3,042,832
Amounts due from credit institutions	1,733,899	-	-	-	-	-	18,759	1,752,658
Investment securities	1,492,313	2,587,018	374,800	227,208	165,913	31,111	2,452	4,880,815
Loans to customers, factoring and finance lease receivables	1,190	2,870,703	1,353,016	2,771,695	5,370,552	2,964,992	4,915,919	20,248,067
Accounts receivable and other loans	463	2,963	13	91	-	-	-	3,530
Total	**5,586,386**	**6,144,995**	**1,727,829**	**2,998,994**	**5,536,465**	**2,996,103**	**4,937,130**	**29,927,902**
Financial liabilities								
Client deposits and notes	5,553,799	3,164,093	1,509,258	8,902,129	1,080,299	513,720	53,518	20,776,816
Amounts owed to credit institutions	476,646	2,297,284	84,200	420,567	795,241	554,167	504,924	5,133,029
Debt securities issued	-	406	25,135	13,388	294,075	5,197	83,158	421,359
Lease liability	-	8,783	8,535	16,287	53,705	29,335	20,909	137,554
Total	**6,030,445**	**5,470,566**	**1,627,128**	**9,352,371**	**2,223,320**	**1,102,419**	**662,509**	**26,468,758**
Net	**(444,059)**	**674,429**	**100,701**	**(6,353,377)**	**3,313,145**	**1,893,684**	**4,274,621**	**3,459,144**
Accumulated gap	**(444,059)**	**230,370**	**331,071**	**(6,022,306)**	**(2,709,161)**	**(815,477)**	**3,459,144**	

	At 31 December 2022							
	On demand	*Up to 3 months*	*Up to 6 months*	*Up to 1 year*	*Up to 3 years*	*Up to 5 years*	*Over 5 years*	*Total*
Financial assets								
Cash and cash equivalents	2,764,823	730,905	-	-	-	-	-	3,495,728
Amounts due from credit institutions	2,396,567	-	437	-	-	-	20,302	2,417,306
Investment securities	947,377	2,315,415	536,087	217,956	142,195	182,498	2,221	4,343,749
Loans to customers, factoring and finance lease receivables	4,204	2,087,352	1,241,786	2,116,316	4,570,794	2,416,951	4,404,200	16,841,603
Accounts receivable and other loans	1,733	1,055	-	610	-	-	-	3,398
Total	**6,114,704**	**5,134,727**	**1,778,310**	**2,334,882**	**4,712,989**	**2,599,449**	**4,426,723**	**27,101,784**
Financial liabilities								
Client deposits and notes	5,433,605	2,811,267	1,297,146	6,962,098	1,224,218	279,175	266,552	18,274,061
Amounts owed to credit institutions	701,208	2,598,973	134,173	382,919	658,256	356,138	359,827	5,191,494
Debt securities issued	-	7,786	51,107	281,718	109,683	195,843	-	646,137
Lease liability	-	6,696	6,908	13,689	45,734	26,920	12,677	112,624
Total	**6,134,813**	**5,424,722**	**1,489,334**	**7,640,424**	**2,037,891**	**858,076**	**639,056**	**24,224,316**
Net	**(20,109)**	**(289,995)**	**288,976**	**(5,305,542)**	**2,675,098**	**1,741,373**	**3,787,667**	**2,877,468**
Accumulated gap	**(20,109)**	**(310,104)**	**(21,128)**	**(5,326,670)**	**(2,651,572)**	**(910,199)**	**2,877,468**	

29. Maturity analysis of financial assets and liabilities (continued)

The Group's capability to discharge its liabilities relies on its ability to realise equivalent assets within the same period of time. In the Georgian marketplace, where most of the Group's business is concentrated, many short-term credits are granted with the expectation of renewing the loans at maturity. As such, the ultimate maturity of assets may be different from the analysis presented above. To reflect the historical stability of current accounts, the Group calculates the minimal daily balance of current accounts over the past two years and includes the amount in the "Up to 1 year" category in the table above. The remaining current accounts are included in the "On demand" category. Pledged Investment Securities are distributed into maturity buckets based on the contractual maturity of the agreement they are pledged for. Securities which can be pledged but are not pledged fall into 'On demand' category. Considering credit cards have no contractual maturities, the above allocation per category is done based on the statistical coverage rates observed.

The Group's principal sources of liquidity are as follows:

- deposits;
- borrowings from international credit institutions;
- inter-bank deposit agreements;
- debt issues;
- proceeds from sale of securities;
- principal repayments on loans;
- interest income; and
- fees and commissions income.

As at 31 December 2024, client deposits and notes amounted to GEL 25,341,733 (2023: GEL 20,776,816, 2022: GEL 18,274,061) and represented 75% (2023: 77%, 2022: 74%) of the Group's total liabilities. These funds continue to provide a majority of the Group's funding and represent a diversified and stable source of funds. As at 31 December 2024, amounts owed to credit institutions amounted to GEL 6,710,494 (2023: GEL 5,133,029, 2022: GEL 5,191,494) and represented 20% (2023: 19%, 2022: 21%) of total liabilities. As at 31 December 2024, debt securities issued amounted to GEL 1,099,337 (2023: GEL 421,359, 2022: GEL 646,137) and represented 3% (2023: 2%, 2022: 3%) of total liabilities.

In the Board's opinion, liquidity is sufficient to meet the Group's present requirements.

The table below shows an analysis of assets and liabilities according to when they are expected to be recovered or settled, except for current accounts of client deposits and notes which are included in 'Up to 1 year' category, noting that respective contractual maturity may expand over significantly longer periods:

	At 31 December 2024		
	Less than 1 year	*More than 1 year*	*Total*
Cash and cash equivalents	2,278,476	-	2,278,476
Amounts due from credit institutions	2,423,727	32,963	2,456,690
Investment securities	7,338,743	488,047	7,826,790
Investment securities pledged under sale and repurchase agreements and securities lending	138,945	-	138,945
Loans to customers, factoring and finance lease receivables	9,243,954	15,072,201	24,316,155
Accounts receivable and other loans	2,790	-	2,790
Prepayments	33,175	5,961	39,136
Foredosed Assets	-	372,577	372,577
Right-of-use assets	-	163,104	163,104
Investment properties	-	140,737	140,737
Property and equipment	-	441,399	441,399
Investments in associates	-	569,137	569,137
Goodwill	-	33,453	33,453
Intangible assets	-	172,367	172,367
Income tax assets	45,738	320	46,058
Other assets	255,342	-	255,342
Assets held for sale	20,007	-	20,007
Total assets	**21,780,897**	**17,492,266**	**39,273,163**
Client deposits and notes	23,399,700	1,942,033	25,341,733
Amounts owed to credit institutions	4,632,457	2,078,037	6,710,494
Debt securities issued	166,657	932,680	1,099,337
Lease liability	42,859	134,506	177,365
Accruals and deferred income	100,406	42,947	143,353
Income tax liabilities	1,155	19,899	21,054
Other liabilities	149,329	-	149,329
Total liabilities	**28,492,563**	**5,150,102**	**33,642,665**
Net	**(6,711,666)**	**12,342,164**	**5,630,498**

29. Maturity analysis of financial assets and liabilities (continued)

	At 31 December 2023			*At 31 December 2022*		
	Less than 1 year	*More than 1 year*	*Total*	*Less than 1 year*	*More than 1 year*	*Total*
Cash and cash equivalents	3,042,832	-	3,042,832	3,495,728	-	3,495,728
Amounts due from credit institutions	1,733,899	18,759	1,752,658	2,397,004	20,302	2,417,306
Investment securities	4,681,339	199,476	4,880,815	4,016,835	326,914	4,343,749
Loans to customers, factoring and finance lease receivables	6,996,604	13,251,463	20,248,067	5,449,658	11,391,945	16,841,603
Accounts receivable and other loans	3,530	-	3,530	3,398	-	3,398
Prepayments	25,154	6,878	32,032	43,825	3,351	47,176
Investments in associates	-	9,537	9,537	-	9,249	9,249
Foredosed Assets	3,823	267,889	271,712	3,760	116,164	119,924
Right-of-use assets	-	134,422	134,422	-	115,404	115,404
Investment properties	-	127,924	127,924	-	170,629	170,629
Property and equipment	-	404,303	404,303	-	363,606	363,606
Goodwill	-	33,453	33,453	-	33,453	33,453
Intangible assets	76	144,281	144,357	-	130,307	130,307
Income tax assets	-	464	464	224	640	864
Other assets	280,615	-	280,615	245,096	-	245,096
Assets held for sale	27,389	-	27,389	29,566	-	29,566
Total assets	**16,795,261**	**14,598,849**	**31,394,110**	**15,685,094**	**12,681,964**	**28,367,058**
Client deposits and notes	19,129,279	1,647,537	20,776,816	16,504,116	1,769,945	18,274,061
Amounts owed to credit institutions	3,278,697	1,854,332	5,133,029	3,817,273	1,374,221	5,191,494
Debt securities issued	38,929	382,430	421,359	340,611	305,526	646,137
Lease liability	33,605	103,949	137,554	27,293	85,331	112,624
Accruals and deferred income	85,809	38,588	124,397	69,792	32,458	102,250
Income tax liabilities	185,440	13,618	199,058	20,258	79,275	99,533
Other liabilities	149,847	-	149,847	152,848	743	153,591
Total liabilities	**22,901,606**	**4,040,454**	**26,942,060**	**20,932,191**	**3,647,499**	**24,579,690**
Net	**(6,106,345)**	**10,558,395**	**4,452,050**	**(5,247,097)**	**9,034,465**	**3,787,368**

30. 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 affected on the same terms, conditions and amounts as transactions between unrelated parties. All transactions with related parties disclosed below have been conducted on an arm's-length basis.

The Bank has re-designed its policies and processes for identifying, assessing, and monitoring the related party transactions. The Bank's risk compliance risk management framework, at all levels, is subject to regular review by the Bank's Internal Audit department and external assurance service providers.

The volumes of related party transactions, outstanding balances at the year-end, and related expenses and income for the year are as follows:

	At 31 December 2024				*At 31 December 2023*			*At 31 December 2022*		
	The parent	*Entities under common control*	*Associates*	*Key management personnel**	*The parent*	*Entities under common control*	*Key management personnel**	*The parent*	*Entities under common control*	*Key management personnel**
Loans outstanding at 31 December, net	**18,484**	**5,517**	**-**	**15,544**	**16,987**	**-**	**9,975**	**16,343**	**-**	**9,752**
Interest income on loans	868	258	-	974	868	-	557	928	-	745
Expected credit loss	-	-	-	80	-	-	(40)	-	-	(200)
Deposits at 31 December	**19,018**	**104,452**	**3,741**	**17,776**	**185,864**	**142,768**	**14,309**	**26,766**	**58,329**	**12,633**
Interest expense on deposits	(4,609)	(3,701)	(97)	(763)	(12,437)	(4,623)	(864)	(2,436)	(1,270)	(959)
Debt securities at 31 December	**-**	**-**	**-**	**-**	**-**	**737**	**-**	**-**	**737**	**-**
Interest expense on debt securities issued	-	-	-	-	-	-	-	(163)	-	-
Commitments, financial and performance guarantees issued	-	-	-	176	-	-	176	-	-	176

**** Key management personnel includes members of BOG's Supervisory Board, BOG's Management Board and key executives of the Group.***

30. Related party disclosure (continued)

Compensation of key management comprised the following:

	2024	2023	2022
Salaries and other benefits	10,345	10,624	9,602
Share-based payments compensation	44,341	50,838	58,110
Total key management compensation	**54,686**	**61,462**	**67,712**

Key management personnel do not receive cash-settled compensation, except for fixed salaries. The major part of the total compensation is share-based (Note 26). The number of key management personnel at 31 December 2024 was 21 (31 December 2023: 22, 31 December 2022: 20).

As at 31 December 2024 interest rates on loans issued to key management personnel were within 5.9% and 10.7%(31 December 2023: 4.5% and 16.8%, 31 December 2022: 4.5% and 17.9%) for FC and GEL denominated loans, respectively. As at 31 December 2024 interest rates on deposits placed by key management personnel were within 0.0% and 12.7%(31 December 2023: 0.0% and 13.5%, 31 December 2022: 0.0% and 13.5%) for FC and GEL denominated deposits, respectively.

31. Capital adequacy

The Group maintains an actively managed capital base to cover risks inherent to the business. The adequacy of the Group's capital is monitored using, among other measures, the ratios established by the NBG in supervising the Bank.

During the year ended 31 December 2024, The Group complied in full with all its externally imposed capital requirements.

The primary objectives of the Group's capital management are to ensure that the Bank complies with externally imposed capital requirements and that the Group maintains strong credit ratings and healthy capital ratios in order to support its business and to maximise shareholder value. The Group 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 Group 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.

IFRS-Based NBG (Basel III) capital adequacy ratio

In December 2017, the NBG adopted amendments to the regulations relating to capital adequacy requirements, including amendments to the regulation on capital adequacy requirements for commercial banks, and introduced new requirements on the determination of the countercyclical buffer rate, on the identification of systematically important banks, on determining systemic buffer requirements and on additional capital buffer requirements for commercial banks within Pillar 2. The NBG requires the Bank to maintain a minimum total capital adequacy ratio of risk-weighted assets, computed based on the Bank's standalone special-purpose financial statements prepared in accordance with NBG regulations and pronouncements, based on Basel III requirements.

30. Related party disclosure (continued)

In January 2023, the NBG transitioned to IFRS-based accounting and introduced a new Pillar 2 buffer - Credit Risk Adjustment (CRA) buffer, to account for the difference between the NBG-based and the IFRS-based provision levels (higher in the former case).

As at 31 December 2024, 31 December 2023 and 31 December 2022, the Bank's capital adequacy ratio on this basis was as follows:

IFRS-Based NBG (Basel III) capital adequacy ratio

	2024	*2023*
Tier 1 capital	5,957,405	4,603,352
Tier 2 capital	462,428	499,018
Total capital	**6,419,833**	**5,102,370**
Risk-weighted assets	**29,080,593**	**23,061,905**
Tier 1 capital ratio	**20.5%**	**20.0%**
Total capital ratio	**22.1%**	**22.1%**
Min. requirement for Tier 1 capital ratio	**17.0%**	**16.7%**
Min. requirement for Total capital ratio	**19.9%**	**19.6%**

As 31 December 2022 the Bank's capital adequacy was as follows:

NBG (Basel III) capital adequacy ratio

	2022
Tier 1 capital	3,388,048
Tier 2 capital	618,232
Total capital	**4,006,280**
Risk-weighted assets	**20,279,424**
Tier 1 capital ratio	**16.7%**
Total capital ratio	**19.8%**
Min. requirement for Tier 1 capital ratio	**13.8%**
Min. requirement for Total capital ratio	**17.2%**

32. Events after the reporting period

On 7 February 2025, the Board of JSC Bank of Georgia declared a final dividend for 2024 of Georgian Lari 3.59 per share. Payment of the total GEL 100,333 final dividends was received by shareholders on 12 February 2025.

On 25 March 2025, JSC BGEO repurchased 0.44% non-controlling interest in JSC Bank of Georgia increasing its ownership to 100%. The consideration of GEL 28,448 was fully paid by JSC BGEO on 26 March 2025.