Bankpozitif Kredi ve Kalkınma Bankası Anonim Şirketi

Independent Auditors' Report on Review of Condensed Consolidated Interim Financial Information For the Three-Month Period Ended 31 March 2018

22 May 2018

This report contains 2 pages of independent auditors' report on review of condensed consolidated interim financial information and 46 pages of condensed consolidated financial statements and notes to the condensed consolidated interim financial information.

Bankpozitif Kredi ve Kalkınma Bankası Anonim Şirketi

TABLE OF CONTENTS

	Page
Independent auditors' report on review of condensed consolidated interim financial information	n
Condensed consolidated interim statement of financial position	1
Condensed consolidated interim statement of profit or loss	2
Condensed consolidated interim statement of profit or loss and other comprehensive income	3
Condensed consolidated interim statement of changes in equity	4
Condensed consolidated interim statement of cash flows	5
Notes to the condensed consolidated interim financial information	6 - 46



KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. İş Kuleleri Kule 3 Kat:2-9 Levent 34330 İstanbul Tel +90 212 316 6000 Fax +90 212 316 6060 www.kpmg.com.tr

Independent auditors' report on review of interim financial information

To the Board of Directors of Bankpozitif Kredi ve Kalkınma Bankası Anonim Şirketi:

Introduction

We have reviewed the accompanying condensed consolidated statement of financial position of Bankpozitif Kredi ve Kalkınma Bankası Anonim Şirketi (the "Bank") and its subsidiary (collectively the "Group") as at 31 March 2018, the condensed consolidated statements of profit or loss and other comprehensive income, changes in equity and cash flows for the three-month period then ended, and notes to the interim financial information ("the condensed consolidated interim financial information"). Management is responsible for the preparation and presentation of this condensed consolidated interim financial information in accordance with International Financial Reporting Standard IAS 34, "Interim Financial Reporting". Our responsibility is to express a conclusion on this condensed consolidated interim financial information based on our review.

Scope of review

We conducted our review in accordance with International Standard on Review Engagements 2410, "Review of Interim Financial Information Performed by the Independent Auditor of the Entity". A review of interim financial information consists of making inquiries, primarily of persons responsible for financial and accounting matters, and applying analytical and other review procedures. A review is substantially less in scope than an audit conducted in accordance with International Standards on Auditing and consequently does not enable us to obtain assurance that we would become aware of all significant matters that might be identified in an audit. Accordingly, we do not express an audit opinion.



Conclusion

Based on our review, nothing has come to our attention that causes us to believe that the accompanying condensed consolidated interim financial information as at 31 March 2018 is not prepared, in all material respects, in accordance with IAS 34, "Interim Financial Reporting".

Emphasis of Matter

We draw attention to Note 11 to the financial statements which describes the uncertainty related to the outcome of the lawsuit filed against the Bank by non-performing corporate customer the Bank. Our opinion is not qualified in respect of this matter.

KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. A member of KPMG International Cooperative

Alper Güvenç, SMMM

Partner

22 May 2018 İstanbul, Turkey

Condensed Consolidated Interim Statement of Financial Position As at 31 March 2018

(Currency - In thousands of Turkish Lira)

		Reviewed	Audited
		31 March	31 December
	Note	2018	2017
ASSETS			
Cash and balances with central banks		5	6
Due from banks and financial institutions		7,017	9,643
Interbank and other money market placements		25,521	235,745
Reserve deposits at central banks		116,447	69,512
Trading assets		14,880	7,486
Investment securities		67,200	60,486
Loaned securities		6,987	14,178
Loans and finance lease receivables	4	853,924	928,707
Property and equipment		2,845	2,742
Intangible assets		7,122	7,381
Deferred tax assets		3,011	3,765
Investment property	6	58,279	58,279
Other assets		33,760	35,106
Total assets		1,196,998	1,433,036
LIABILITIES			
Other money market deposits		6,717	30,177
Trading liabilities		3,067	4,426
Funds borrowed	7	671,714	339,028
Debt securities issued	8	110,864	637,743
Other liabilities		47,317	48,031
Provisions		9,635	7,047
Total liabilities		849,314	1,066,452
EQUITY			
Share capital and share premium	9	379,114	379,114
Legal reserves		16,168	16,168
Available-for-sale reserve, net of tax	9	•	4,918
Fair value reserve of debt instruments at fair			
value through other comprehensive income			
(FVOCI), net of tax	9	5,276	
Accumulated losses		(52,874)	(33,616)
Total equity		347,684	366,584
Total equity and liabilities		1,196,998	1,433,036

Condensed Consolidated Interim Statement of Profit or Loss For the three-month period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

		Reviewed	Reviewed
	Note	1 January – 31 March 2018	1 January – 31 March 2017
		<u> </u>	
Continuing operations			
Interest income		4.5.710	25.425
Interest income on loans and finance leases		16,718	25,427
Interest income on deposits with other banks and financial			
institutions		865	1,084
Interest income on investment securities		1,401	709
Interest income on interbank and other money market placements		3,380	707
Other interest income		4,327	229
Total interest income		26,691	28,156
Interest expense			
Interest expense on other money market deposits		(303)	(343)
Interest expense on funds borrowed		(6,794)	(9,284
Interest expense on debt securities issued		(6,513)	(6,202)
Other interest expense		(2,823)	(1,412
Total interest expense		(16,433)	(17,241)
•			
Net interest income		10,258	10,915
Fees and commission income		1,853	2,125
Fees and commission expense		(158)	(1,367)
Net fee and commission income		1,695	758
Net trading income and foreign exchange gain, net		1,692	531
Other operating income	14	94	422
Total operating income		13,739	12,626
Net impairment reversal/(loss) on financial assets	4	3,019	1,958
Personnel expenses		(6,987)	(6,783
Depreciation and amortisation		(587)	(807
Administrative expenses		(3,897)	(4,506
Taxes other than on income		129	(202
Other expenses		(2,572)	(816
Total operating expenses		(13,914)	(13,114
D		2.044	1 497
Profit before income tax		2,844	1,470
Income tax		(634)	(117
Profit for the period		2,210	1,353

Condensed Consolidated Interim Statement of Profit or Loss and Other Comprehensive Income For the three-month period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

Reviewed	Reviewed
1 January– 31 March 2018	1 January– 31 March 2017
2,210	1,353
(400)	(231)
109	46
(291)	(185)
	2,755
	379
423	
55	
(120)	(627)
358	2,507
67	2,322
2 277	3,675
	1 January- 31 March 2018 2,210 (400) 109 (291) 423 55 (120) 358

Condensed Consolidated Interim Statement of Changes in Equity For the three-month period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

	Note	Share capital	Share premium	Adjustment to share capital	Legal reserves	Available- for-sale reserve, net of tax	Accumulated losses	Total
At 1 January 2017		337,292	20,121	21,701	16,168	1,096	(38,133)	358,245
Total comprehensive income for the period Profit for the period		-	_	_	-	-	1,353	1,353
•							,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,
Other comprehensive income Remeasurements of defined benefit liability/(asset), net of tax							(185)	(185)
Net change in fair value of available-for-sale financial assets, net of tax		_	_	_	_	2,507	(103)	2,507
Total other comprehensive income						2,507	(185)	2,322
Total comprehensive income for the period		-	-	-	-	2,507	1,168	3,675
Contributions by and distributions to owners								
Dividends to equity holders		_	_	_	_	_	_	_
Total contributions by and distributions to owners		-	-	-	-	-	-	
At 31 March 2017		337,292	20,121	21,701	16,168	3,603	(36,965)	361,920
At 51 Watch 2017		331,232	20,121	21,701	10,100	3,003	(30,703)	301,720
	N .	Share	Share	Adjustment to share		Fair value reserve of debt instruments at FVOCI,	Accumulated	T. 4.1
At 1 January 2018	Note 9	capital 337,292	premium 20,121	capital 21,701	Legal reserves 16,168	net of tax 4,918	losses (33,616)	Total 366,584
Changes on initial application of IFRS 9	9	331,292	20,121	21,701	10,108	4,918	(21,177)	(21,177)
Restated balance at 1 January 2018		337,292	20,121	21,701	16,168	4,918	(54,793)	345,407
Total comprehensive income for the period								
Profit for the period		=	-	-	-	-	2,210	2,210
Other comprehensive income Remeasurements of defined benefit liability/(asset), net of tax		_	_	_	_	_	(291)	(291)
Net change in fair value of financial assets measured at fair value through other							(2)1)	(2)1)
comprehensive income (FVOCI), net of tax		-	-	-	-	358	-	358
Total other comprehensive income		-	-	-	-	358	(291)	67
Total comprehensive income for the period		-	-	-	-	358	1,919	2,277
Contributions by and distributions to owners								
Dividends to equity holders		-	-	-			=	
Dividends to equity holders Total contributions by and distributions to owners		-	-	-	-	-	-	

Condensed Consolidated Interim Statement of Cash Flows For the three-month period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

	Reviewed	Reviewed
	1 January –	1 January –
Note	· · · · · · · · · · · · · · · · · · ·	31 March 2017
Cash flows from operating activities		
Interest received	20,731	27,613
Interest paid	(21,296)	(22,761)
Fees and commissions received		
	1,596	2,362
Fees and commissions paid	(158)	(1,367)
Trading income	613	477
Recoveries from non-performing loans 4	10,664	3,056
Cash payments to employees and other parties	(13,168)	(10,408)
Cash received from/(paid to) other operating activities	203	(10,818)
Cash paid for other operating activities	(8,223)	(4,064)
	(9,038)	(15,910)
Change in banks and financial institutions	(3,452)	(54)
Change in trading assets	323	1,882
	(46,834)	72,259
Change in reserve deposits at central banks	` ' '	
Change in loans and finance lease receivables	18,119	116,272
Change in other assets	1,270	10,823
Change in interbank and other money market deposits	(23,438)	2,361
Change in other liabilities	5,190	5,132
Net cash (used in) / provided by operating activities	(57,860)	192,765
Cash flows from investing activities		
Purchases of investment securities	(3,600)	(4,555)
Proceeds from sale and redemption of investment securities	5,575	7,269
Purchases of property and equipment	(436)	(324)
Proceeds from the sale of premises and equipment	7	(0.67)
Purchases of intangible assets	(2)	(867)
Net cash provided by investing activities	1,544	1,524
Cash flows from financing activities		
Proceeds from funds borrowed	573,992	165,853
Repayment of funds borrowed	(213,974)	(413,584)
Proceeds from debt securities issued	108,702	98,347
	,	
Repayment of debt securities issued	(627,124)	(53,122)
Net cash used in financing activities	(158,404)	(202,506)
Effect of net foreign exchange difference on cash and cash equivalen	ts 1,869	1,869
Net decrease in cash and cash equivalents	(212,851)	(5,051)
Cash and cash equivalents at 1 January	245,394	70,117
Cash and cash equivalents at 31 March	32,543	65,066
Cash and Cash equivalents at 31 March	34,343	05,000

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

Notes to the condensed consolidated interim financial information

Notes to ti	de Condensed Consolidated Inter ini financial information	Pages
Note 1	Corporate information	7
Note 2	Basis of preparation	8
Note 3	Use of judgements and estimates	13
Note 4	Loans and finance lease receivables	14
Note 5	Taxation	16
Note 6	Investment property	17
Note 7	Funds borrowed	18
Note 8	Debts securities issued	19
Note 9	Capital and reserves	19
Note 10	Related parties	21
Note 11	Commitment and contingencies	22
Note 12	Financial risk management	27
Note 13	Fair value of financial and non-financial instruments	43
Note 14	Operating segments	44
Note 15	Rating	46
Note 16	Subsequent and other events	46

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

1. Corporate information

General

Bankpozitif Kredi ve Kalkınma Bankası A.Ş. ("BankPozitif" or "the Bank") was incorporated in Turkey on 9 April 1999 as Toprak Yatırım Bankası A.Ş. as a subsidiary of Toprakbank A.Ş. On 30 November 2001, Toprakbank A.Ş. (the previous parent company) was taken over by the Saving Deposit Insurance Fund ("SDIF"). As a result, SDIF became the controlling shareholder of Toprak Yatırım Bankası A.Ş., C Faktoring A.Ş. acquired 89.92% of the Bank's shares on 1 November 2002 in an auction from SDIF. Following the acquisition, the name of the Bank was changed as C Kredi ve Kalkınma Bankası A.Ş. C Faktoring A.Ş. and its nominees increased their shareholding to 100% by share capital increases and by purchasing other third party minority shareholders' shares.

Negotiations of the new shareholding structure of the Bank which began in 2005 were finalised and a final share subscription agreement was signed on 13 December 2005. Under this agreement, Bank Hapoalim B.M. ("Bank Hapoalim") acquired a 57.55% stake in BankPozitif by means of a capital injection to be made through Tarshish-Hapoalim Holdings and Investments Ltd. ("Tarshish"), a whollyowned subsidiary of Bank Hapoalim. On 23 December 2005, the name of the Bank was changed as Bankpozitif Kredi ve Kalkınma Bankası A.Ş. Legal approvals concerning the new partnership have been obtained from Israeli and Turkish authorities in 2006 and extraordinary general assembly of the Bank was convened on 31 October 2006.

On 8 April 2008, Tarshish's share in BankPozitif increased to 65.00% by way of share capital increase. On 7 April 2009, Tarshish acquired 4.825% shares of BankPozitif from C Faktoring A.Ş. and Tarshish's share in BankPozitif increased to 69.83%.

As at 31 March 2018, 69.83% (31 December 2017 – 69.83%) of the shares of the Bank belong to Tarshish and are controlled by Bank Hapoalim and 30.17% (31 December 2017 – 30.17%) of the shares belong to C Faktoring A.Ş.

The registered head office address of the Bank is located at Rüzgarlıbahçe Mah. Kumlu Sok. No: 3 Yesa Blokları Kavacık 34805 Beykoz – Istanbul / Turkey.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

1. Corporate information (continued)

Nature of activities of the Bank / Group

The Bank carries out its activities as corporate and retail banking. The Bank's corporate services mainly include corporate lending, project finance, trade finance and financial leasing. In retail banking, the Bank mainly provides retail lending products such as consumer loans, home equity, mortgages, and vehicle to its customers. Apart from lending business, the Bank provides insurance and investment products to its customers. As a non-deposit taking bank, the Bank borrows funds from financial markets and from its counterparties.

C Bilişim Teknolojileri ve Telekomünikasyon Hizmetleri A.Ş. ("C Bilişim") is specialised in software development and provides other technological support services to the financial sector including the Bank and its subsidiaries.

On 20 October 2015, an agreement between the bank and Eurasian Bank JSC has been signed regarding the sale of shares of the bank's subsidiary JSC BankPozitiv Kazakhstan. As of 30 December 2015, required approvals have been obtained from the regulatory institution of Kazakhistan and the shares of JSC BankPozitiv Kazakhstan have been transferred to EurasianBank JSC with a sale amount of USD 26,265,782 (TL 75,245,530).

As at 31 March 2018, the Bank provides services through its head office. As at 31 March 2018, the number of employees for the Bank and its consolidated subsidiaries are 69 and 2, respectively (31 December 2017 – 127 and 2).

For the purposes of the condensed consolidated interim financial information, the Bank and its consolidated held for sale subsidiaries are referred to as the "Group".

The subsidiaries included in consolidation and effective shareholding percentages of the Group at 31 March 2018 and 31 December 2017 are as follows:

	Place of incorporation	Principal activities		e shareholding ting rights (%)
			31 March 2018	31 December 2017
C Bilişim	Istanbul/Turkey	Software development and technology	100	100

2. Basis of preparation

The interim consolidated condensed financial statements as of 31 March 2018 have been prepared in accordance with IAS 34 (Interim Financial Reporting). The interim consolidated condensed financial statements do not include all the information and disclosures required in the annual financial statements and should be read in conjunction with annual consolidated financial statements of the Group for the year ended 31 December 2017.

In preparation of the interim condensed consolidated financial statements of the Group, the same accounting policies except than IFRS 9 and IFRS 15 and methods of computation have been followed as compared to the most recent annual financial statements except for the adoption of new standards and interpretations as of March 2018, noted below.

The Group has started to apply IFRS 9 Financial Instruments ("IFRS 9") published by in the accompanying consolidated financial statements starting from 1 January 2018 for the first time based in connection with procedures and principals regarding classification of loans and allowances allocated for such loans which came into force starting from 1 January 2018.

IFRS 15 and other new IFRS/IAS amendments in effect do not have significant impact on the accounting policies, financial position and performance of the Group.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

2. Basis of preparation (continued)

New standards and interpretations not yet adopted

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

IFRS 16 Leases

On 13 January 2016, IASB issued the new leasing standard which will replace IAS 17 Leases, IFRIC 4 Determining Whether an Arrangement Contains a Lease, SIC 15 Operating Leases – Incentives, and SIC 27 Evaluating the Substance of Transactions Involving the Legal Form of a Lease and consequently changes to IAS 40 *Investment Properties*. IFRS 16 *Leases* eliminates the current dual accounting model for lessees, which distinguishes between on-balance sheet finance leases and off-balance sheet operating leases. Instead, there is a single, on-balance sheet accounting model that is similar to current finance lease accounting. Lessor accounting remains similar to current practice. The standard is effective for annual periods beginning on or after 1 January 2019. The Group is assessing the potential impact on its consolidated financial statements resulting from the application of IFRS 16.

Annual Improvements to IFRSs 2015-2017 Cycle

Improvements to IFRSs

IASB issued Annual Improvements to IFRSs - 2015–2017 Cycle. The amendments are effective as of 1 January 2019. Earlier application is permitted. The Group does not expect that application of these improvements to IFRSs will have significant impact on its consolidated financial statements.

IAS 12 Income Taxes

IAS 12 is amended to clarify that all income tax consequences of dividends (including payments on financial instruments classified as equity) are recognised consistently with the transactions that generated the distributable profits – i.e. in profit or loss, other comprehensive income (OCI) or equity.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

2. Basis of preparation (continued)

Transition disclosures of IFRS 9 -Financial instruments

Significant changes in accounting policies and significant accounting errors identified are applied retrospectively and the prior period financial statements are restated. According to IFRS 9 and IFRS 15 transitional provisions, prior period financial statements and footnotes are not restated. Changes in accounting policies for these new standards are presented in the current accounting policies.

	Original classification under IAS 39	31 December 2017	IFRS 9 Classifications	IFRS 9 Remeasurement	1 January 2018	New classification under IFRS 9
ASSETS						
Other money market	Loans and					
placements Loans and finance lease	receivables Loans and	235,745	-	(28)	235,717	Amortised cost
receivables Investment securities –	receivables Available-	928,707	-	(17,046)	911,661	Amortised cost
available-for-sale Investment securities –	for-sale	60,486	(60,486)	-		
FVOCI			60,486	-	60,418	FVOCI
Loaned securities available for sale	Available- for-sale	11,273	(11,273)	_		
Loaned securities – FVOCI Loaned securities – trading	101-5410	11,273	11,273	-	11,273	FVOCI
assets	FVTPL	2,905	-	-	2,905	FVTPL
Deferred tax assets	Loans and	3,765	-	1,625	5,390	
Other assets	receivables	35,106	-	(1,322)	33,852	Amortised cost
LIABILITES						
Provisions Accumulated losses		7,047 (33,616)		4,407 (21,177)	11,454 (54,793)	

Explanations on financial assets

The Group categorizes its financial assets as "Fair Value Through Profit/Loss", "Fair Value Through Other Comprehensive Income" or "Measured at Amortized Cost". Such financial assets are recognized or derecognized according to IFRS 9 - Financial Instruments. Financial assets are measured at fair value at initial recognition in the financial statements. During the initial recognition of financial assets other than "Financial Assets at Fair Value Through Profit or Loss", transaction costs are added to fair value or deducted from fair value. The Group recognizes a financial asset into financial statements when it becomes a party to the contractual terms of a financial instrument. During the first recognition of a financial asset into the financial statements, business model determined by Bank management and the nature of contractual cash flows of the financial asset are taken into consideration. When the business model determined by the Bank's management is changed, all affected financial assets are reclassified and this reclassification is applied prospectively. In such cases, no adjustments is made to earnings, losses or interest that were previously recorded in the financial statements.

a) Financial assets at the fair value through profit or loss: "Financial assets at fair value through profit/loss" are financial assets other than the ones that are managed with business model that aims to hold to collect contractual cash flows or business model that aims to collect both the contractual cash flows and cash flows arising from the sale of the assets; and if the contractual terms of the financial asset do not lead to cash flows representing solely payments of principal and interest at certain date; that are either acquired for generating a profit from short-term fluctuations in prices or are financial assets included in a portfolio aiming to short-term profit making. Financial assets at the fair value through profit or loss are initially recognized at fair value and remeasured at their fair value after recognition. All gains and losses arising from these valuations are reflected in the income statement.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

2. Basis of preparation (continued)

Transition disclosures of IFRS 9 – Financial instruments (continued)

Explanations on financial assets (continued)

- b) Financial Assets at Fair Value Through Other Comprehensive Income: In addition to financial assets within a business model that aims to hold to collect contractual cash flows and aims to hold to sell, financial asset with contractual terms that lead to cash flows are solely payments of principal and interest at certain dates, they are classified as fair value through other comprehensive income. Financial assets at fair value through other comprehensive income are recognized by adding transaction cost to acquisition cost reflecting the fair value of the financial asset. After the recognition, financial assets at fair value through other comprehensive income are remeasured at fair value. Interest income calculated with effective interest rate method arising from financial assets at fair value through other comprehensive income and dividend income from equity securities are recorded to income statement. "Unrealized gains and losses" arising from the difference between the amortized cost and the fair value of financial assets at fair value through other comprehensive income are not reflected in the income statement of the period until the acquisition of the asset, sale of the asset, the disposal of the asset, and impairment of the asset and they are accounted under the "Accumulated other comprehensive income or expense to be reclassified through profit or loss" under shareholders' equity. Equity securities, which are classified as financial assets at fair value through other comprehensive income, that have a quoted market price in an active market and whose fair values can be reliably measured are carried at fair value. During initial recognition an entity may irrevocably elect to record the changes of the fair value of the investment in an equity instrument that is not held for trading purposes in the other comprehensive income. In the case of this preference, the dividend from the investment is taken into the financial statements as profit or loss.
- c) Financial Assets Measured at Amortized Cost: Financial assets that are held for collection of contractual cash flows where those cash fows represent solely payments of principal and interest are classified as financial assets measured at amortized cost. Financial assets measured at amortized cost are initially recognized at acquisition cost including the transaction costs which reflect the fair value of those instruments and subsequently recognized at amortized cost by using effective interest rate method. Interest income obtained from financial assets measured at amortized cost is accounted in income statement.
- d) Derivative Financial Assets: The major derivative instruments utilized by the Group are foreign currency and interest rate swaps, cross currency swaps, currency options and currency forwards. Derivative financial instruments of the Group are classified under "IFRS 9 Financial Instruments" ("IFRS 9"), "Derivative Financial Assets Designated at Fair Value through Profit or Loss". Payables and receivables arising from the derivative instruments are recorded in the off-balance sheet accounts at their contractual values. Derivative transactions are valued at their fair values subsequent to their acquisition. In accordance with the classification of derivative financial instruments, if the fair value is positive, the amount is classified as "Derivative Financial Assets Designated at Fair Value Through Profit or Loss" or "Derivative Financial Assets Designated at Fair Value Through Other Comprehensive Income", if the fair value is negative, the amount is classified as "Derivative Financial Liabilities Designated at Fair Value Through Other Comprehensive Income". The fair value differences of derivative financial instruments are recognized in the income statement under trading profit/loss line in profit/loss from derivative financial transactions.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

2. Basis of preparation (continued)

Transition disclosures of IFRS 9 – Financial instruments (continued)

Explanations on financial assets (continued)

e) Loans: Loans are financial assets that have fixed or determinable payments terms and are not quoted in an active market. Loans are initially recognized at acquisition cost plus transaction costs presenting their fair value and thereafter measured at amortized cost using the "Effective Interest Rate (internal rate of return) Method". Group's loans are recorded under the "Measured at Amortized Cost" account.

Explanations on expected credit loss:

The Group allocates impairment for expected loss on financial assets measured at amortized cost and measured at fair value through other comprehensive income. As of 1 January 2018, the Group recognizes provisions for impairment in accordance with IFRS 9 requirements. In this framework, as of 31 December 2017, method of provisions for impairment as set out in accordance with the related legislation of IAS 39 is changed by applying the expected credit loss model under IFRS 9.

The expected credit loss estimates are required to be unbiased, probability-weighted and include supportable information about past events, current conditions, and forecasts of future economic conditions.

These financial assets are divided into three categories depending on the gradual increase in credit risk observed since their initial recognition:

Stage 1: For the financial assets at initial recognition or that do not have a significant increase in credit risk since initial recognition. Impairment for credit risk is recorded in the amount of 12-month expected credit losses.

Stage 2: In the event of a significant increase in credit risk since initial recognition, the financial asset is transferred to Stage 2. Impairment for credit risk is determined on the basis of the instrument's lifetime expected credit losses.

Stage 3: Stage 3 includes financial assets that have objective evidence of impairment at the reporting date. For these assets, lifetime expected credit losses are recognized and interest revenue is calculated on the net carrying amount.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

3. Use of judgements and estimates

In preparing these condensed consolidated interim financial statements, the bank management has made judgements, estimates and assumptions that affect the application of accounting policies and the reported amounts of assets and liabilities, income and expense. Actual results may differ from these estimates.

The significant judgements made by management in applying the Group's accounting policies and the key sources of estimation uncertainty were the same as those that applied to the consolidated financial statements as at end for the year ended 31 December 2017 except than estimations used for expected credit loss calculation according to IFRS 9 explained in Note 2 – Basis of preparation - Transition disclosures of IFRS 9 –Financial instruments, Explanations on expected credit loss.

Measurement of fair values

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal or, in its absence, the most advantageous market to which the Group has access at that date. The fair value of a liability reflects its non-performance risk.

When measuring the fair value of an asset or a liability, the Group uses market observable data as far as possible. Fair values are categorised into different levels in a fair value hierarchy based on the inputs used in the valuation techniques as follows:

Level 1: Quoted market price (unadjusted) in an active market for identical instrument.

Level 2: Valuation techniques based on observable inputs, either directly (i.e., as prices) or indirectly (i.e., derived from prices). This category includes instruments using valuation techniques where all significant inputs are directly or indirectly observable from market data.

Level 3: Valuation techniques using significant unobservable inputs. This category includes all instruments where the valuation technique includes inputs not based on observable data and the unobservable inputs have a significant effect on the instrument's valuation.

If the inputs used to measure the fair value of an asset or a liability might be categorised in different levels of the fair value hierarchy, then the fair value measurement is categorised in its entirety in the same level of the fair value hierarchy as the lowest level input that is significant to the entire measurement.

The Group recognises transfers between levels of the fair value hierarchy at the end of the reporting period during which the change has occurred. Further information about the assumptions made in measuring fair values is included in Note 13 – fair value of financial and non-financial instruments.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

4. Loans and finance lease receivables

			Foreign	
	Turkish	Foreign	currency	
31 March 2018	Lira	currency	indexed	Total
Corporate loans and finance lease receivables	85,834	663,728	84,531	834,093
Consumer loans	1,573		617	2,190
Total loans and finance lease receivables	87,407	663,728	85,148	836,283
Loans and finance lease receivables in arrears	47,307	-	-	47,307
Less: Lifetime ECL impaired credits (stage 3)	(22,227)	-	-	(22,227)
Less: Lifetime ECL significant increase in credit risk				
(stage 2)	(527)	-	-	(527)
Less: 12 month ECL (stage 1)	(6,912)	_	-	(6,912)
· · · · · ·	, ,			. , ,
	105,048	663,728	85,148	853,924
			Foreign	
	Turkish	Foreign	currency	
31 December 2017	Lira	currency	indexed	Total
Corporate loans and finance lease receivables	158,777	661,912	64,168	884,857
Consumer loans	2,213	-	695	2,908
Total loans and finance lease receivables	160,990	661,912	64,863	887,765
Loans and finance lease receivables in arrears	58,217	-	-	58,217
Less: Specific reserve for impairment	(14,450)	-	-	(14,450)
Less: Portfolio reserve for impairment	(2,825)	-	-	(2,825)
•				
	201,932	661,912	64,863	928,707

As at 31 March 2018, loans and finance lease receivables with floating rates are TL 199,268 (31 December 2017 – TL 151,689) and fixed interest rates are TL 637,015 (31 December 2017 – TL 736,076).

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

4. Loans and finance lease receivables (continued)

Movements in non-performing loans and finance lease receivables:

	31 March 2018	31 December 2017
Non-performing loans and finance lease receivables at 1 January	58,217	76,153
Additions to non-performing loans and finance lease receivables	1,553	2,048
Recoveries	(10,827)	(18,629)
Write-offs (1)	(1,636)	(1,355)
Non-performing loans and finance lease receivables at the end of period	47,307	58,217

⁽¹⁾ TL 1,636 of non-performing loans and finance lease receivables were sold to an asset management company as at 31 March 2018 (31 December 2017 – TL 1,355).

Movements in the expected credit losses for loan and finance lease receivables:

	31 March 2018
Reserve at the beginning of the year	17,275
IFRS 9 transition impact	17,046
Provision net of recoveries	(3,019)
- Credit loss expense on financial assets	509
- Recoveries	(3,528)
Write-offs	(1,636)
Reserve at the end of the period	29,666

Movements in the reserve for possible loan and finance lease receivables losses:

	31 December 2017
Reserve at the beginning of the year	23,564
Provision net of recoveries	(5,781)
- Provision for loan and finance lease receivables impairment	1,534
- Recoveries	(7,315)
Write-offs	(508)
Reserve at the end of the period	17,275

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

5. Taxation

The Group is subject to taxation in accordance with the tax procedures and the legislation effective in Turkey. While the corporate tax rate was at the rate of 20% since 1 January 2016, for all companies, such rate has been set as 22% for the tax bases of the years 2018, 2019, and 2020 based on the legislation of the Amendment on Certain Tax Laws and Other Laws no. 7061. Furthermore, the Council of Ministers has been authorized to reduce the rate of 22% down to 20%.

Corporate tax losses can be carried forward for a maximum period of five years following the year in which the losses were incurred. The tax authorities can inspect tax returns and the related accounting records for a retrospective maximum period of five years. Corporate tax returns are required to be filed by the twentyfifth day of the fourth month following the year-end reporting date and taxes must be paid in one instalment by the end of the fourth month. In Turkey, the tax legislation does not permit a parent company and its subsidiary to file a consolidated tax return. Therefore, provision for taxes, as reflected in the consolidated financial position, has been calculated on a separate-entity basis.

As at 31 March 2018, TL 4,151 of deferred tax assets are recognised for TL 18,866 of tax losses of the Group (31 December 2017: TL 3,146 of deferred tax assets and TL 15,730 of tax losses), unused tax credits and deductible temporary differences to the extent that it is probable that future taxable profits will be available against which they can be used.

Deferred tax assets have not been recognised in respect of the remaining tax losses amounting to TL 59.772.

Deferred tax assets reflected on the balance sheets for 31 March 2018 and 31 December 2017 are:

	31 March 2018	31 December 2017
Deferred tax assets	3,011	3,765

Tax losses carried forward subject to deferred tax

Recognised tax losses carried forward expire as follows.

	31 March 2018	31 December 2017
2021	15,422	15,730
2022	-	-
2023	3,444	-
	18,866	15,730

Unrecognised deferred tax assets

Deferred tax assets have not been recognised in respect of the following items, because it is not probable that future taxable profit will be available against which the Group can use the benefits therefrom.

	31 March 2018	31 December 2017
Tax losses	59,772	57,501
	59,772	57,501

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

6. Investment property

In 2014, the Group classified its Hotel in Gaziantep, previously recorded in Other Assets under Assets Held for Resale, as Investment Property in terms of change in right of repurchase. The Group has started to earn rental income from this property and therefore in accordance with IAS 40, the Group has presented the Hotel as Investment Property.

Accordingly, the Hotel was valued by an independent appraiser. According to the report dated 7 December 2016 prepared by a real estate appraisal company, which is included in the list to provide valuation service by the Capital Markets Board of Turkey ("CMB"), the fair value of hotel is determined as TL 58,279 for shares of the land and building owned by the Group determined according to the discounted cash flow projections approach.

The fair values of the Group's investment property are categorized into Level 3 of the fair value hierarchy.

The following table shows a reconciliation from the beginning balances to the ending balances for fair value measurements in Level 3 of the fair value hierarchy:

	1 January – 31 March 2018	1 January – 31 December 2017
Balance at 1 January Additions Accounted in other income	58,279	58,250 29
Change in fair value	-	-
Total	58,279	58,279

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

7. Funds borrowed

	31 Marcl	31 March 2018		r 2017
	Turkish Lira	Foreign currency	Turkish Lira	Foreign currency
Short-term ⁽¹⁾				
Fixed interest	51,536	383,536	259	109,886
Floating interest	-	9,937	-	14,228
Long-term ⁽¹⁾				
Fixed interest	-	226,705	-	214,655
Floating interest	-	-	-	, -
Total	51,536	620,178	259	338,769

⁽¹⁾ Based on original maturities.

Floating rate borrowings have interest rate repricing periods of 1 to 9 months.

As at 31 March 2018 and 31 December 2017, funds borrowed are unsecured.

As at 31 March 2018 and 31 December 2017, the Group has not had any defaults of principal, interest or redemption amounts.

Reconciliation of movement of funds borrowed to cash flows from financing activities

	31 December 2017	Cash items	Foreign currency conversion adjustments	Other non-	31 March 2018
Funds borrowed	339,028	360,018	(28,193)	861	671,714
Total	339,028	360,018	(28,193)	861	671,714
	31 December 2016	Cash items	Foreign currency conversion adjustments	Other non-	31 December 2017
Funds borrowed	675,358	(239,738)	(95,562)	(1,030)	339,028
Total	675,358	(239,738)	(95,562)	(1,030)	339,028

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

8. Debt securities issued

	31 March 2018		31 December 2017	
	Turkish Lira	Foreign currency	Turkish Lira	Foreign currency
Debt securities issued at amortised cost	110,864	-	104,284	533,459
Total	110,864	-	104,284	533,459

Reconciliation of movement of debt securities issued to cash flows from financing activities

	31 December 2017	Cash items	Foreign currency conversion adjustments	Other non- cash items	31 March 2018
Debt securities issued	637,743	(519,427)	1,005	(8,457)	110,864
Total	637,743	(519,427)	1,005	(8,457)	110,864

	31 December 2016	Foreign currency conversion Cash items adjustments		Other non-	31 December 2017
Debt securities issued	580,487	16,737	37,905	2,614	637,743
Total	580,487	16,737	37,905	2,614	637,743

9. Capital and reserves

	31 March 2018	31 December 2017	
NI I C I TO O 1 (C C II TO)			
Number of common shares, TL 0.1 (in full TL),			
par value (Authorized and issued)	3.372.923.500	3.372.923.500	

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

9. Capital and reserves (continued)

Share capital and share premium

As at 31 March 2018 and 31 December 2017, the composition of shareholders and their respective percentage of ownership are summarized as follows:

	31 March 20	31 December 2017			
	Amount %		Amount	%	
m 1:1	225.515	60.00	225 515	60.02	
Tarshish	235,515	69.83	235,515	69.83	
C Faktoring A.Ş.	101,777	30.17	101,777	30.17	
	337,292	100.00	337,292	100.00	
Share premium	20,121		20,121		
Restatement effect	21,701		21,701		
Share capital and share premium	379,114		379,114		

There are no rights, preferences and restrictions on the distribution of dividends and the repayment of capital.

Legal reserves

The legal reserves consist of first and second legal reserves in accordance with the Turkish Commercial Code. The first legal reserve is appropriated out of the statutory profits at the rate of 5%, until the total reserve reaches a maximum of 20% of the entity's share capital. The second legal reserve is appropriated at the rate of 10% of all distributions in excess of 5% of the entity's share capital. The first and second legal reserves are not available for distribution unless they exceed 50% of the share capital, but may be used to absorb losses in the event that the general reserve is exhausted.

Other reserves

Financial assets measured at fair value through other comprehensive income (FVOCI) reserve

The financial assets measured at fair value through other comprehensive income (FVOCI) reserve includes the cumulative net change in the fair value of financial assets measured at fair value through other comprehensive income (FVOCI) investment securities until the investment is derecognised or impaired.

As at 31 March 2018, financial assets measured at fair value through other comprehensive income (FVOCI) reserve is TL 5,276.

Available-for-sale reserve

The available-for-sale reserve includes the cumulative net change in the fair value of available-for-sale investment securities until the investment is derecognised or impaired.

As at 31 December 2017, available-for-sale reserve is TL 4,918.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

10. Related parties

The Group is controlled by Bank Hapoalim and C Faktoring A.Ş. which owns 69.83% and 30.17% of ordinary shares, respectively (31 December 2017 – 69.83% and 30.17%, respectively). The ultimate controlling shareholder of the Group is Bank Hapoalim. For the purpose of these condensed consolidated interim financial information, unconsolidated subsidiaries, shareholders, and companies controlled by Bank Hapoalim and C Faktoring A.Ş. are referred to as related parties.

In the course of conducting its banking business, the Group conducted various business transactions with related parties. These include loans and finance lease receivables, customer accounts, funds borrowed and non-cash transactions. These are all commercial transactions and realised on an armslength basis. The volumes of related party transactions, outstanding balances at period-end and relating expense and income for the period are as follows:

	Directors and key management Shareholders personnel			Others		
	2018	2017	2018	2017	2018	2017
Loans and finance lease receivables						
At 1 January	-	-	9	27	-	-
At end of the period/year	-	-	4	9	-	-
Interest income (1)	_	_	_	_	_	_

⁽¹⁾ Interest income in the above tables for 2017 represents the balances as of 31 March 2017.

As at 31 March 2018, no provisions have been recognised in respect of loans and finance lease receivables given to related parties (31 December 2017 – none).

	Shareholders		Directors and key management personnel		Others	
	2018	2017	2018	2017	2018	2017
Funds borrowed						
At 1 January	-	282,408	-	-	7,593	7,073
At end of the period/year	277,593	-	-	-	8,017	7,593
Interest expense (1)	(2,048)	(16)	_	_	(75)	(324)

⁽¹⁾ Interest expense in the above tables for 2017 represents the balances as of 31 March 2017.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

10. Related parties (continued)

Other balances with related parties:

Related party		Deposits	Other liabilities	Non-cash loans	Other interest expense
Shareholders	31 March 2018	-	3	2,471	-
	31 December 2017	-	-	-	-
Directors and key management	31 March 2018	_	-	-	-
personnel	31 December 2017	-	-	-	-
Others	31 March 2018		62	18	
Oulcis	31 March 2018 31 December 2017	_	-	-	_

Compensation of key management personnel of the Group

The executive and non-executive member of Board of Directors and management received remuneration and fees amounted to TL 1,674 (31 March 2017 – TL 3,182) comprising salaries and other benefits.

11. Commitments and contingencies

In the normal course of business activities, the Bank and its subsidiaries undertake various commitments and incur certain contingent liabilities that are not presented in the financial statements including:

	31 March 2018	31 December 2017
Letters of guarantee	281,962	276,137
Letters of credit	17,983	45,294
Other guarantees	16,841	15,623
Commitments	15,194	624,436
Total non-cash loans	331,980	961,490

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

11. Commitments and contingencies (continued)

The copy of Debt Liquidation and Right of Repurchase Agreement made between Gaziantep Çağlar and the Bank in land register was falsified by forgery of documents. With such forged document, it was irregularly made subject of execution proceeding with judgement at TL 48,378 with the file of Gaziantep Execution Office no. 13 with merits no. 2016/94269. The Bank executes the three following legal transactions in connection with such fraud attempt.

- 1. The Bank filed a complaint to Enforcement Court against proceeding filed against the Bank because of the fact that the document basis of proceeding is not suitable for enforcement proceeding and the irregularity during proceeding filing transactions. Upon the complaint, the court made a decision of interlocutory injunction and the trial was postponed to 27 October 2016. However, the provisional judge who heard the file during judiciary recess revoked the interlocutory injunction without any justification and the proceeding started over. Despite the dispute filed to the court, no suspension of proceeding again decision was made. During the first trial held on 27 October 2016, the court decided the cancellation of the Execution Proceeding. The other party appealed to the Divisional Court; however the Divisional Court rejected other party's demand. Whereupon the other party also appealed for the decision of the Divisional Court to the Supreme Court. The appellate petition of the other party was received by the Bank. The Bank has been submitted its statements to mentioned appeal and the other party has been submitted their statements to the Bank's appeal. Right after, the Bank sent its respond. The Supreme Court's decision is expected. The Bank's management expects that the appellate will be concluded in favor of the Bank.
- 2. Upon release of the injunction decision made by Civil Court of Enforcement as described at above article, a Negative Declaratory Action (demand for determination of not being debtor by the court) was filed under the file of 2016/964 by Gaziantep Commercial Court of First Instance no. 1 which is another court in order to stop ongoing proceeding again. During file opening, a letter of guarantee amounting to TL 60,241 was submitted a cautionary judgment was caused to be taken on execution proceeding. The parties submitted declarations to the Court, evidence was provided. The court decided to postpone the hearing to 31 May 2017 for waiting for missing files and evaluating evidence and declarations. In the meantime, as set forth at article one, since the proceeding was revoked and need for taking a cautionary judgment on execution proceeding disappeared automatically, the part TL 7,236 held by the Execution Office of the abovementioned letter of guarantee amounting to TL 60,241 was returned. Decision has been made at the hearing held on 31 May 2017 about returning the letter amounting to TL 7,236 held by the court. At the hearing dated 31 May 2017 the court decided to the judgement of dismissal without any further explanation.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

11. Commitments and contingencies (continued)

The reason for the judgement of dismissal was also not clearly stated in the justified decision sent by the court. It has been stated that the court made the judgement on the basis of Supreme Court's decisions of two test cases which are irrelative with the current case. The Bank appealed to the Divisional Court (1st degree appellate) on 18 July 2017. The other party has been submitted their statements to the Bank's appeal and right after, the Bank sent its respond. The Divisional Court's decision is expected. The Divisional Court decided to return the case file to the local court in order for it to be returned to itself upon the completion of the incomplete items declared by the Bank. Incomplete items were completed and the file was sent to the 11th Civil Chamber of Gaziantep Regional Court of Justice by the Local Court. The file is currently under the review of the 11th Civil Chamber of Gaziantep Regional Court of Justice. The Bank's management's opinion is that as the judgement of the dismissal has no legal basis, the appellate will be concluded in favor of the Bank.

The Bank filed a complaint to Gaziantep Chief Prosecutor's Office against those who attempted the fraud. The Prosecutor's Office made decision of non-prosecution about Gaziantep Cağlar, filing a lawsuit against the assistant manager to the bailiff for misconduct, and opening an investigation about two board members of the Bank for slander and giving misstatement to public authorities. A dispute was filed by the Bank to Criminal Court of Peace against the Prosecutor's Office's decision; however the Court rejected the Bank's demand. The Bank applied to the Ministry of Justice in the benefit of administration of the justice for cancellation of Prosecutor's Office decision which is against procedure and the law and likewise the Court decision which rejected the Bank's dispute as biased. The Ministry of Justice expressed their opinion to reverse the unlawful judgement of the prosecution and the file has been sent to the Penalty Department no.15 of the Supreme Court. Penalty Department no.15 of the Supreme Court is accepted the Bank's objection and decided to "reverse the local criminal court's decision for the sake of law" in the conclusion the 3rd Criminal Court of Peace has sent the file back to the Public prosecutor to prepared and filed an bill of indictment. The Public Prosecutor has prepared and filed an bill of indictment against the accused persons because of forgery on an official document sequentially, attempt to aggravated fraud. The hearing will be held on 6 July 2018 in the Gaziantep 5th Aggravated Felony Court.

An independent law office and the Bank's legal department collaborate on prosecutor investigation related to the above-listed legal processed. The Legal Department Counsels and an independent law office collaborate on the side of civil lawsuits.

In addition to this, the Bank receives opinions and considerations from expert people both on the sides of prosecution and civil lawsuits. In this scope, the Bank received two separate legal opinions from different expert people, the consideration being jointly prepared in this field by two different expert people. Both considerations identified many juridical errors and illegal transactions at prosecutor's office investigation and criminal court of peace decision. Further, the private expert report obtained during prosecutor's office's investigation was jointly reviewed by three specialists and a consideration was submitted that the expert report is legally invalid and the scientific work inside the report is already erroneous. Legal consideration and support is obtained from different experts about subjects related to Execution Court and Negative Declaratory Action.

The Bank filed complaints to the Board of Judges and Prosecutors (HSK) about Prosecutors and Judges whom the Bank consider performed illegal transactions during the trial process. Upon the Bank's complaints, HSK gave permission of investigation, as a result of investigations carried out by inspectors, irregularities were determined and defense request was asked.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

11. Commitments and contingencies (continued)

Further, the Ministry of Justice inspectors who inspected execution leg of the fraud attempt determined irregularities and completed their reports. The Bank requested dismissal from civil service and proceeding for the assistant manager who had started the execution proceeding with judgement and for the other 4 court personnel, disciplinary measures and proceedings have also been requested.

In addition to these, Directorate of Land Registry and Cadastre inspection board inspected land register leg of the fraud attempt and made determinations against declarations submitted by suspects to the prosecutor's office. The most important finding here is that the forged document used in the execution proceeding with judgement was not officially delivered to the land registry during the sale of the hotel and it cannot be detected who attached this forged document to the land registry file and how or when it was attached.

The Bank's management expects that the lawsuits will be concluded in favor of the Bank on the basis of many facts and legal grounds that corroborate allegations of the Bank under the abovementioned developments.

The Gaziantep Chief Public Prosecutor's Office wrote a letter addressed to the Banking Regulation and Supervision Agency indicating its suspicion that two board members of the Bank had committed crimes of slander and giving misstatement to public authorities. In its reply letter, the Banking Regulation and Supervision Agency stated that it as the institution had conducted all the necessary investigations with regard the issue in question and did not reach any conclusion as to the existence of any crime element in this regard.

4. Upon the Bank's main complaint to the Public Prosecutor's Office, a criminal lawsuit was filed against the suspect the assistant manager to the bailiff, the assistant manager to the bailiff, in the Gaziantep 15th Criminal Court of First Instance's case file numbered 2017/121 on the grounds of "Professional Misconduct". The related litigation is on-going and the court decided on the Bank's participation in the case as an intervener due to the possibility of the Bank's incurring damages due to the crime committed and postponed the hearing to be held on 27 April.2018. The court decided to consolidate the file with the Gaziantep 5th Aggravated Felony Court file.

Upon the report prepared by the Inspection Board of the Ministry of Justice, the Gaziantep Chief Public Prosecutor's Office prepared and filed an bill of indictment with a document number of 2017/32294 and requested that the suspects be sentenced on the grounds of Professional Misconduct. The case file numbered 2017/640 is still pending before the Gaziantep 12th Criminal Court of First Instance.

The court has reached a conclusion that the official receiver, about whom the investigation in the investigation file numbered 2017/74224 being conducted by the Gaziantep Chief Public Prosecutors' Office is still on-going, might have had committed the crime of professional misconduct and decided to prosecute the suspect within the scope of this case file as well due to his connection with the transactions included in this case file. The court is still reviewing the case file. Testimony of accused the assistant manager to the bailiff was taken by the court and the hearing has been postponed to 5 July 2018.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

11. Commitments and contingencies (continued)

Although the approval required for the investigation of the land registry personnel in the public prosecutors' office's investigation conducted due to the irregularities occurred during the stages of the Land Registry Directorate's sending the documents that had not been requested by the execution office and the sending and receiving of such documents was requested from the Governorship of Gaziantep, the Governorship decided not to grant such an investigation approval. Upon such decision, the Bank applied to the 1st Administrative Court of the Gaziantep Regional Administrative Court. The related court determined the Bank's rejections as just and decided to initiate an investigation about the land registry personnel. Upon such decision, the Public Prosecutors' Office conducted the necessary investigations and prepared and filed a bill of indictment in order for a prosecution case to be filed against the assistant manager to the bailiff, the assistant manager to the bailiff, the person who had helped with the said transactions, the official receiver, the land registry personnel on the grounds of Professional Misconduct and Joint Professional Misconduct. Such bill of indictment has been accepted by the Gaziantep 6th Criminal Court of First Instance in its case file numbered 2018/83. Testimonies of accused persons was taken in the hearing of the Gaziantep 6th Criminal Court of First Instance and the hearing has been postponed to 5 July 2018.

The Bank's compliant made due to the fact that Gaziantep Çağlar, the person who had helped with the said transactions and their two lawyers had made transactions before the Land Registry Directorate by giving out the name of Bank and produced forged documents is still being investigated by the Gaziantep Chief Public Prosecutors' Office with an investigation file number of 2017/95484.

The investigation about the 4 land registry personnel about whom the Bank had filed a complaint in the Gaziantep Chief Public Prosecutors' Office's investigation file numbered 2016/49291, but no actions has yet to be taken has also been included within the scope of this investigation file and it is being investigated under the Gaziantep Chief Public Prosecutors' Office's investigation file numbered 2016/70494. The investigation approval about these persons has been requested from the Gaziantep Governorship and the Gaziantep Governorship has added 3 more personnel to these 4 land registry personnel and approved a total of 7 personnel to be investigated.

Fiduciary activities

The Group provides custody, investment management and advisory services to third parties. Those assets that are held in a fiduciary capacity are not included in this consolidated financial information.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management

Strategy in using financial instruments

BankPozitif's risk approach is to achieve sound and sustainable low risk profile on consolidated basis, through the identification, measurement and monitoring of all types of risks inherent in the nature of the business activities. The main principle of the Group is to manage the credit risk effectively, to eliminate the market risk by not carrying positions and intelligent handling of operational risks supporting the group in achieving its strategic goals. With this understanding, the Group has given priority to create a risk aware culture in which all functions of the Group understand the risks being exposed; to have well-defined areas of responsibilities; to identify and map the risks and controls of each process and to have prudent procedures for the new products and applications.

BankPozitif's basic risk classifications and policies can be summarised as follows:

- well managing the credit risk through a high standardised credit risk management,
- minimizing market risk with the avoidance of currency, interest rate and maturity positions,
- identifying, assessing, monitoring and controlling of the operational risks inherent in products, activities, systems and material processes.

In the credit risk management process of the Group, sound risk management practices are targeted in compliance with Basel II recommendations.

In accordance with the BankPozitif's market risk management strategy; the Group aims not to carry market risk positions and intends to create matching assets and liabilities to eliminate asset liability management risks i.e. maturity risk and interest rate sensitivity risk.

Additionally, in order to minimise the market risk, marketable securities portfolio is limited proportional to the total assets size with a conservative trade limit and most of the securities are floating rate notes.

The Bank declares its risk appetite and tolerance levels for the primary risk areas on a Board approved policy since 2009.

Board of Directors is the highest authority to set all risk management guidelines, and it is responsible for ensuring that the Group implements all necessary risk management techniques in compliance with the related regulatory requirements both in Turkey and Israel. Board of Directors follows its duties not only by itself but also through audit committee, which is composed of two board members and responsible for the supervision of the efficiency and adequacy of BankPozitif's internal systems, namely internal control, risk management, internal audit and compliance. The audit committee also oversees the proper functioning of these systems and the accounting and reporting systems and is responsible for the integrity of the information produced.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Strategy in using financial instruments (continued)

All risk limits are set by the Board of Directors and reviewed on a regular basis.

The main functions and authority of the Board of Directors related to risk management activities are as follows:

- to define the risk policy of the Group, including that of all its subsidiaries, regarding exposure to various risks (credit risks, market risks, operational risks),
- to manage and guide all the activities of internal systems directly/through committees,
- to approve new business lines, products or activities that would have a substantial effect on activities of the Group,
- The Group manages its exposure to all types of risks through the asset and liability management committee ("ALCO") and executive committee, set by Board of Directors and comprising members of senior management, and a representative of main shareholder (board member/consultant of Board of Directors nominated by Bank Hapoalim) and also through limits set on the credit, treasury and asset liability management activities of the Group. These limits are approved and quarterly reviewed by Board of Directors and ALCO and executive committee supervise the compliance with the limits,
- Permanent learning program for the Board of Directors is in place from the beginning of 2011 including the subjects risk management, corporate governance in general and corporate governance in the financial sector, Basel II, reporting standards (IFRS and BRSA) and audit,
- In summary, in order not to be exposed to liquidity, interest rate and foreign currency risk, the Group aims to keeps its funding structure in line with the asset structure (in terms of currency, maturity and interest rate) and hedges its positions through various derivative transactions. In addition to that, the Group does not prefer to take speculative positions on currency, interest rate and maturity that might create risk to the Group due to changes in the prices or mismatch of assets and liabilities.

Credit risk

- Credit risk refers to the risk that a contractual partner defaults on its contractual obligations or does not deliver in full accordance with the conditions of contract,
- As the focus of BankPozitif is defined as credit activities, credits are the most significant part of its activities and thus managed meticulously. BankPozitif follows a strict credit policy which is reviewed and approved by Board of Directors at certain intervals and whenever necessary. The process for approving, amending and renewing is clearly regulated together with collateral requirements. All facilities are assessed prior to approval via a series of evaluation meetings to ensure that the strict criteria laid out in the Group is adhered to regarding the issues like sector, subsector, collateral, maturity, project type etc.,
- To avoid the default risks to the best possible extend, the Group applies a well-defined "credit allocation process" and afterwards monitoring of the portfolio is being executed using a number of precautionary actions by relevant functions.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Credit risk (continued)

	Loans and advances to	Loans and advances	Investment securities	
31 March 2018	customers	to banks	and loaned securities	Non cash loans
Carrying amount	700.001	7.017	74.107	221 000
12 month ECL (stage 1)	798,901	7,017	74,187	331,980
Lifetime ECL significant	27 202			
increase in credit risk (stage 2)	37,382	-	-	-
Lifetime ECL impaired credits	47.207			
(stage 3)	47,307	-	-	-
Allowance for impairment				
- 12 month ECL (stage 1)	(527)	_	-	-
- Lifetime ECL significant	, ,			
increase in credit risk (stage 2)	(6,912)	<u>-</u>	_	-
- Lifetime ECL impaired credits	()			
(stage 3)	(22,227)	-	-	-
	853,924	7,017	74,187	331,980
	055,924	7,017	/4,10/	331,980
	Loans and advances to	Loans and advances	Investment securities	
31 December 2017	customers	to banks	and loaned securities	Non cash loans
Neither past due nor impaired	868,224	9,643	74,664	961,490
Past due but not impaired	19,541	7,043	74,004	701,470
Individually impaired	58,217	_	_	_
	,			
Allowance for impairment				
- Individual impairment	(14,450)	-	-	-
- Collective impairment	(2,825)	-	-	-
	928,707	9,643	74,664	961,490

The Group regards a loan and advance or a debt security as impaired in the following circumstances.

- i) There is objective evidence that a loss event has occurred since initial recognition and the loss event has an impact on future estimated cash flows from the asset.
- ii) A retail loan is overdue for 90 days or more.

Loans that are subject to a collective provision are not considered impaired.

Bankpozitif manages its credit portfolio as per following main principles;

Creating credit risk awareness throughout the Group

Senior management is responsible for putting the policies into practice approved by Board of Directors and identifying and managing of credit risk is the joint concern of all staff of the Bank.

The day-to-day management of credit risk is devolved to individual business units, such as the loans and risk monitoring departments of corporate and retail business, which perform regular appraisals of quantitative and qualitative information relating to counterparty credit with respect to their loan policies and procedures.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Credit risk (continued)

Having a reliable credit allocation function

Credit approval authorities and their approval limits are also decided by board based on a combination of "rating" and "being new/existing customers" pillars.

Credit approval processes for both retail and corporate loans are centralised. Retail and corporate loans and risk monitoring departments are organised independently from the sales and marketing departments. The retail and corporate loans and risk monitoring departments do not have any sales targets and are solely responsible for the evaluation and allocation of new loans and monitoring the performance of the loan portfolio. Loans and risk monitoring departments are not included in any phase of the pricing of loans.

All the credit marketing, allocation and follow up stages are defined in corporate and retail loan policies, which are approved and reviewed regularly by Board of Directors.

Within the light of "no exception policy" applied in the Group, the compliance of loan disbursements with internal and legal regulations are checked by internal control unit prior to disbursement.

Risk limits

There are risk limits, set by Board of Directors, describing relevant credit limits such as single borrower limit, group exposure limit, sectorial limit, credit approval authorities and their approval limits. Risk limits are determined by comparing Turkey and Israel legislations and the most conservative limitation is taken as benchmark while determining the internal limit.

Although the Bank is not subject to local regulation in terms of credit limits (due to being an investment bank), the Bank set internal credit limits, Single borrower limit is set as 15% (it is lower than the regulatory requirement of 25%) of total equity. In addition to this, the limit for group of borrower is set as 25% of total equity.

Sectoral distribution of loans is monitored on a daily and monthly basis and sectoral analysis of those loans is made in accordance with their risk concentration every year. The Group set a limit on single sector concentration by 20% of total loan book.

In addition to sectorial and borrower limits, the Group has limits on own risk groups' indebtedness as 10% of total equity. Furthermore a limit on six largest borrowers and groups is set as 135% of total equity.

The Group seeks to manage its credit risk exposure through diversification of lending activities to avoid undue concentrations of risks with individuals or groups of customers in specific locations or businesses.

As at 31 March 2018, the share of the Group's loan to its top 20 credit customers in its total loan portfolio is 87% (31 December 2017 - 69%).

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Credit risk (continued)

Measuring risk

The Bank uses two internally developed rating systems i.e. borrower rating system and facility rating system. Borrower rating is the measure of borrower's creditworthiness that is mapped by the bank to a risk grade and then to a PD (probability of default). Facility rating assesses the risk of a facility, taking into account associated collateral and guarantees and provides view for the recovery of the risk. Both systems have been validated by Bank Hapoalim's credit risk modelling department over a set of sample corporate financials/facilities.

Facility rating system was developed in 2008 and is being used for the corporate loan customers. This module, differently from the borrower rating module as explained above, rates the transaction instead of the corporate customer and reflects the expected loss amount in case of a default by taking into account collateral types which are subject to coefficients.

Expected loss of credit portfolio is calculated regularly by the Bank. In the calculation, PD values of Group for each rating category is determined by simulating PD's of an international rating institution to the Group's rating classes using "central tendency of the Group" since the Group is lacking such historical data. Central tendency factor is calculated by correlating sectoral non-performing loans ratios of banking sector to Group values.

Both rating systems are being used in credit decisions, the first one giving the indications for borrowers repayment capacity, while the second one for facility's repayment capacity. Requirement of facility rating of BB or higher for the new credit clients is the main principle.

Regarding retail business, decision trees developed internally (and validated by Experian Scorex) are being used to evaluate retail applicants. G3 scores of Credit Bureau is used in the classification of retail customers.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Credit risk (continued)

Monitoring the risk

At certain intervals, FX positions of credit customers are analysed using certain sensitivity scenarios and indirect credit risk assumed is measured. Risk management department controls structure of portfolio by product type, maturity, sector, geographical concentration, rating, currency, collateral and borrower/group of borrowers. The department also monitors concentration levels of the portfolio using internationally accepted criterion, makes recommendations and reports its findings at appropriate managerial levels. Additionally, it calculates sectorial diversification of the loan portfolio in accordance with Herfindahl-Herschman Concentration Index. Bank's credit portfolio, either retail or corporate, is monitored through several analysis and stress tests by predetermined scenarios to measure profit or loss and results are reported at appropriate managerial levels.

Segment information by sectorial concentration for cash loans, finance lease receivables and non-cash loans is as follows:

	Cash	Non-cash	
31 March 2018	loans	loans	Total
Electric production and supply	287,621	29,759	317,380
Holding companies	132,410	3,426	135,836
Other commercial services	102,654	14,466	117,120
Public works and civil engineering	69,802	35,311	105,113
Food, beverage and tobacco industries	75,040	989	76,029
Transportation	71,844	118	71,962
Other financial institutions	2,700	63,771	66,471
Building contractor (general and special trade)	34,090	16,794	50,884
Metal and by-products	2,310	41,346	43,656
Personal other services	3,530	39,838	43,368
Trade	-	26,426	26,426
Electrical and electronic equipment	-	13,070	13,070
Consumer loans	10,924	-	10,924
Machinery and equipment	· -	10,487	10,487
Textile and clothing	8,066	30	8,096
Tourism and entertainment	-	5,480	5,480
Others	-	30,669	30,669
Total performing loans	800,991	331,980	1,132,971
Loans in arrears	47,307	-	47,307
Interest accruals	35,292	-	35,292
Loss allowances (amounts arising from ECL)	(29,666)	=	(29,666)
Total loans	853,924	331,980	1,185,904

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Credit risk (continued)

Monitoring the risk (continued)

	Cash	Non-cash	
31 December 2017	loans	loans	Total
Financial institutions	33,150	669,015	702,165
Electric production and supply	264,257	55,005	319,262
Holding companies	136,777	3,180	139,957
Other commercial services	103,871	14,466	118,337
Public works and civil engineering	70,632	36,291	106,923
Building contractor (general and special trade)	59,562	18,419	77,981
Food, beverage and tobacco industries	71,853	989	72,842
Transportation	70,251	113	70,364
Personal other services	4,025	39,180	43,205
Metal and by-products	4,327	34,236	38,563
Trade	-	36,823	36,823
Electrical and electronic equipment	-	13,034	13,034
Textile and clothing	11,224	30	11,254
Consumer loans	10,976	-	10,976
Machinery and equipment	564	7,012	7,576
Tourism and entertainment	=	5,480	5,480
Agriculture and forestry	1,500	, =	1,500
Others	, -	28,217	28,217
Total performing loans	842,969	961,490	1,804,459
I amain amana	59.217		
Loans in arrears	58,217	-	58,217
Interest accruals	44,796	=	44,796
Provision for possible loan losses	(17,275)	-	(17,275)
Total loans	928,707	961,490	1,890,197

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Credit risk (continued)

Monitoring the risk (continued)

Total collateralisation coverage of cash and non-cash loans are 90% as at 31 March 2018 (31 December 2017-65%).

The following table sets out the collateralisation of Bank's cash and non-cash loan portfolio, including finance lease receivables:

	31 March 2018	31 December 2017
Code Loons (to do Pero Constitution and Code land)		
Cash loans (including financial lease receivables) under loan in arrears		
Secured by mortgages	_	46,777
Secured by mortgages Secured by guarantee	_	
Secured by guarantee Secured by assignment and cheques	_	
Unsecured	47,307	11,440
Onsecured	47,307	11,440
Total	47,307	58,217
Cash loans (including financial lease receivables)		
except loan in arrears		
Secured by cash	8,825	8,166
Secured by mortgages	314,769	317,437
Secured by pledge	92,931	89,230
Secured by guarantee	96,563	112,277
Secured by assignment and cheques	313,850	347,731
Unsecured	9,345	12,924
Total	836,283	887,765
Non-cash loans		
Secured by cash	5,623	11,845
Secured by mortgages	9,150	1,657
Secured by pledge	3,407	469
Secured by guarantee	199,711	296,421
Secured by assignment and cheques	47,028	13,659
Unsecured	67,061	637,439
Total	331,980	961,490

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Liquidity risk

Liquidity risk is the probability of loss arising from a bank's inability to meet its obligations when they come due without incurring unacceptable losses. Liquidity risk includes (1) the inability to manage unplanned decreases or changes in funding sources (2) the failure to recognise or address changes in market conditions that affect the ability to liquidate assets quickly and with minimal loss in value.

In order to manage this risk, the Group measures and manages its cash flow commitments on a daily basis, and maintains liquid assets, which it judges sufficient to meet its commitments. There are risk limits set for liquidity risks as; ratio of total assets maturing within one month to total liabilities maturing within one month cannot be lower than 100% (It is set as 80% for foreign currency assets to liabilities). ALCO closely monitors daily, weekly and monthly liquidity position of the bank and has the authority to take actions where necessary.

The Group uses various methods, including predictions of daily cash positions, and scenario analysis to monitor and manage its liquidity risk to avoid undue concentration of funding requirements at any point in time or from any particular source. Risk management and treasury departments monitor daily liquidity gaps in all currencies.

Liquidity position of the Group is measured on monthly basis with three scenarios i.e. global scenario, local scenario and bank specific scenario which are run on TL positions, foreign currency positions and on a total basis. The scenarios aim to show the repayment capacity of the Group using only quasi cash assets against the liabilities of 1 month and 1 year periods. Since the Group has funding centred asset creating structure, the Group does not prefer to take any liquidity risk (monitored cumulatively) in any currency, in any point in any time as decided by the top management of the Group.

Generally, the Bank does not prefer to utilise liquidity from Interbank money markets and is in a net lender position in Interbank money markets.

The table on the next two pages analyses assets and liabilities of the Group into relevant maturity groupings based on the remaining period at reporting date to contractual maturity date.

31 March 2018	Carrying amount	Gross outflow	On demand	Up to 1 month	1 to 3 months	3 months to 1 year	1 to 5 years	Over 5 years
Interbank and other money market deposits	6,717	6,717	-	6,717	-	-	-	-
Funds borrowed	671,714	703,126	_	95,698	28,406	330,349	136,392	112,281
Debt securities issued	110,864	114,074	_		56,037	58,037	· -	· -
Current account of loan customers (1)	33,517	33,517	-	26,656	5,505	-	1,356	-
	822,812	857,434	-	129,071	89,948	388,386	137,748	112,281

⁽¹⁾ Included in other liabilities.

	Carrying	Gross	On	Up to 1	1 to 3	3 months	1 to 5	Over 5
31 December 2017	amount	outflow	demand	month	months	to 1 year	years	years
Interbank and other money market								
•	20.177	20.177		20.177				
deposits	30,177	30,177	-	30,177	-	-	-	-
Funds borrowed	339,028	387,007	-	21,948	19,926	107,939	127,119	110,075
Debt securities issued	637,743	685,989	-	50,027	635,962	-	-	-
Current account of loan customers (1)	32,532	32,532	-	25,747	5,505	-	1,280	-
	1,039,480	1,135,705	-	127,899	661,393	107,939	128,399	110,075

⁽¹⁾ Included in other liabilities.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Liquidity risk (continued)

	Up to	1 to 3	3 to 6	6 to 12	1 to 5	Over 5	
31 March 2018	1 month	months	months	months	years	years	Tota
Forward purchase contracts	15,573	1	-	-	-	-	15,574
Forward sale contracts	15,816	1	-	-	-	-	15,817
Currency swap purchases	100,562	105,726	152,237	-	-	8,226	366,751
Currency swap sales	98,767	106,324	142,469	-	-	-	347,560
Interest rate cap/floor purchase contracts	-	-	2,742	-	-	110,789	113,531
			******			440.04.	0.50.004
	230,718	212,052	297,448	-	-	119,015	859,233
	,			6 to 12		,	859,23.
31 December 2017	230,718 Up to 1 month	212,052 1 to 3 months	3 to 6 months	6 to 12 months	1 to 5 years	Over 5 years	
	Up to 1 month	1 to 3 months	3 to 6		1 to 5	Over 5	Tota
31 December 2017 Forward purchase contracts Forward sale contracts	Up to 1 month	1 to 3	3 to 6		1 to 5	Over 5 years	Tota
Forward purchase contracts	Up to 1 month	1 to 3 months	3 to 6		1 to 5 years	Over 5 years	Tota 1,950 1,950
Forward purchase contracts Forward sale contracts	Up to 1 month 1,756 1,764	1 to 3 months	3 to 6 months	months - -	1 to 5 years	Over 5 years	Tota 1,950 1,950 280,660
Forward purchase contracts Forward sale contracts Currency swap purchases	Up to 1 month 1,756 1,764 195,636	1 to 3 months 193 194 83,309	3 to 6 months	- 361	1 to 5 years	Over 5 years	Tota 1,959 280,666 152,784 114,729

Market risk

The Group has low risk appetite towards products which are subject to market risks. Market risks arise from open positions in interest rate, currency and equity/commodity prices, all of which are exposed to general and specific market movements.

The interest rate and exchange rate risks of the financial positions taken by the Bank related to financial position and off-balance sheet accounts are measured and while calculating the capital adequacy, the amount subject to value at risk (VaR) is taken into consideration by the standard method. As at 31 March 2018, the highest potential loss of the securities portfolio was generated by historical simulation method as TL 66 (31 December 2017 – TL 345) for one day.

The Group has the principle not to carry equity/commodity portfolios which may cause losses based on the price changes.

The Group has a cautious approach towards derivatives transactions. In principle, derivatives are dealt only for the hedging of banking book. Trade or "market-making" in financial derivative instruments is not among the ordinary activities of the Group and possible only by specific authorisation of the Board of Directors and subject to VaR limits as well as stress scenarios.

The Board of Directors of the Bank determines the risk limits for primary risks carried by the Bank and quarterly revises these limits. For the purpose of hedging market risk, the Bank primarily aims to balance the foreign currency position, create matching assets and liabilities and manage positive liquidity.

Currency risk

The Group takes on exposure to effects of fluctuations in the prevailing foreign currency exchange rates on its financial position and cash flows. Foreign currency risk indicates the possibility of the potential losses that the Group is subject to due to the exchange rate movements in the market. The Group does not prefer to carry foreign currency risk and holds foreign currency asset and liability items together with derivatives in balance against the foreign currency risk.

The Group manages foreign currency risk by daily controls of financial planning and control department and treasury department; weekly ALCO meetings, comprising members of senior management of the Bank and through limits on the positions which can be taken by the Bank's treasury department.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Currency risk (continued)

The concentrations of assets, liabilities and off balance sheet items are as follows:

31 March 2018	USD	Euro	CHF	JPY	Others	Total
Assets						
Due from banks and financial institutions	768	346	43	1	298	1,456
Fair value through comprehensive income	5,180	15	-	_	-	5,195
Reserve deposits at central Banks	111,048	-	-	-	-	111,048
Loans and finance lease receivables ⁽¹⁾	471,843	276,415	587	_	31	748,876
Other assets	292	-	-	-	2	294
Total assets	589,131	276,776	630	1	331	866,869
Liabilities						
Funds borrowed	297,877	322,301	-	_	-	620,178
Other liabilities	7,087	15,182	-	-	-	22,269
Total liabilities	304,964	337,483	-	-	-	642,447
Gross exposure	284,167	(60,707)	630	1	331	224,422
Off-balance sheet position						
Net notional amount of derivatives	(277,291)	60,814	(579)	-	(332)	(217,388)
Net exposure	6,876	107	51	1	(1)	7,034
31 December 2017	USD	Euro	CHF	JPY	Others	Total
0 = = 000000000000000000000000000000000					0 1	
Assets						
Due from banks and financial institutions	3,203	542	139	-	258	4,142
Due from banks and financial institutions Reserve deposits at central Banks	68,944	-	-	-	-	68,944
Due from banks and financial institutions Reserve deposits at central Banks Loans and finance lease receivables	68,944 477,750	542 - 248,328		- - 11		68,944 726,775
Due from banks and financial institutions Reserve deposits at central Banks	68,944	-	-	- - 11	-	68,944
Due from banks and financial institutions Reserve deposits at central Banks Loans and finance lease receivables	68,944 477,750	-	646	- - 11 -	40	68,944 726,775
Due from banks and financial institutions Reserve deposits at central Banks Loans and finance lease receivables Other assets Total assets	68,944 477,750 3,141	248,328	- 646 -	-	40	68,944 726,775 3,141
Due from banks and financial institutions Reserve deposits at central Banks Loans and finance lease receivables Other assets Total assets Liabilities	68,944 477,750 3,141 553,038	248,328 - 248,870	- 646 -	-	40	68,944 726,775 3,141 803,002
Due from banks and financial institutions Reserve deposits at central Banks Loans and finance lease receivables Other assets Total assets Liabilities Funds borrowed	68,944 477,750 3,141 553,038 35,484	248,328	- 646 -	-	40	68,944 726,775 3,141 803,002 338,769
Due from banks and financial institutions Reserve deposits at central Banks Loans and finance lease receivables Other assets Total assets Liabilities	68,944 477,750 3,141 553,038	248,328 - 248,870	- 646 -	-	40	68,944 726,775 3,141 803,002
Due from banks and financial institutions Reserve deposits at central Banks Loans and finance lease receivables Other assets Total assets Liabilities Funds borrowed Debt securities issued	68,944 477,750 3,141 553,038 35,484 533,459	248,328 248,870 303,285	785	-	40	68,944 726,775 3,141 803,002 338,769 533,459
Due from banks and financial institutions Reserve deposits at central Banks Loans and finance lease receivables Other assets Total assets Liabilities Funds borrowed Debt securities issued Other liabilities	68,944 477,750 3,141 553,038 35,484 533,459 17,415	248,328 248,870 303,285 9,950	785	- 11 - -	298	68,944 726,775 3,141 803,002 338,769 533,459 27,366
Due from banks and financial institutions Reserve deposits at central Banks Loans and finance lease receivables Other assets Total assets Liabilities Funds borrowed Debt securities issued Other liabilities Total liabilities Gross exposure	68,944 477,750 3,141 553,038 35,484 533,459 17,415 586,358	248,328 248,870 303,285 9,950 313,235	785	- 11	298 - - - -	68,944 726,775 3,141 803,002 338,769 533,459 27,366 899,594
Due from banks and financial institutions Reserve deposits at central Banks Loans and finance lease receivables Other assets Total assets Liabilities Funds borrowed Debt securities issued Other liabilities Total liabilities	68,944 477,750 3,141 553,038 35,484 533,459 17,415 586,358	248,328 248,870 303,285 9,950 313,235	785	- 11	298 - - - -	68,944 726,775 3,141 803,002 338,769 533,459 27,366 899,594
Due from banks and financial institutions Reserve deposits at central Banks Loans and finance lease receivables Other assets Total assets Liabilities Funds borrowed Debt securities issued Other liabilities Total liabilities Gross exposure Off-balance sheet position	68,944 477,750 3,141 553,038 35,484 533,459 17,415 586,358 (33,320)	248,328 248,870 303,285 9,950 313,235 (64,365)	785 	- 11	298 	68,944 726,775 3,141 803,002 338,769 533,459 27,366 899,594 (96,592)

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Currency risk (continued)

Sensitivity analysis

A 10% weakening of TL against the foreign currencies at 31 March 2018 and 31 March 2017 would have effect on the equity and profit or loss by the amounts shown below. This analysis assumes that all other variables, in particular interest rates, remain constant.

	31 Mai	rch 2018	31 Marc	ch 2017
	Equity	Profit or loss	Equity	Profit or loss
USD	688	688	339	339
EUR	11	11	2	2
Other currencies	5	5	615	615
Total	704	704	956	956

A 10% strengthening of the TL against the foreign currencies at 31 March 2018 and 31 March 2017 would have had the equal but opposite effect on the above currencies to the amounts shown above, on the basis that all other variables remain constant.

Cash flow and fair value interest rate risk

Cash flow interest rate risk is the risk that the future cash flows of a financial instrument will fluctuate because of change in market interest rates. Fair value interest rate risk is the risk that the value of a financial instrument will fluctuate because of change in market interest rates. The Group takes on exposure to the effects of fluctuations in the prevailing levels of market interest rates on both its fair value and cash flows.

The Group mainly funds its TL assets through its shareholders' equity and is not exposed to interest rate risk in TL assets and liabilities. Foreign currency assets of the Group give rise to interest rate risk as a result of mismatches or gaps in the amounts of foreign currency assets and liabilities and that mature or reprice in a given period. The Group prefers to protect itself from the effects created by the interest rate volatility and to have a match in interest rate risk. Interest rate sensitivity of the Bank is measured and monitored by duration analysis and PV01 analysis by risk management and financial planning and control departments accompanied by an interest sensitive gap representation to illustrate the negative and positive amounts of relevant time buckets.

The Group manages interest rate risk by the ALCO under the supervision of Board of Directors. The Group does not aim to generate income from the mismatch of interest rate sensitive assets and liabilities and nor make losses. Therefore the main objective of interest rate management is to eliminate interest rate sensitivity risk by creating matching assets and liabilities. In case of need, the Group utilises interest rate cap/floor agreements, interest rate swaps and setting limits on the positions, which can be taken by the Group's credit and treasury divisions to hedge the interest rate sensitivity of the Group.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Cash flow and fair value interest rate risk (continued)

The table below summarises the Group's exposure to interest rate risk on the basis of the remaining period at the reporting date to the repricing date:

31 March 2018	Up to 1 month	1 to 3 months	3 to 6 months	6 months to 1 year	1 to 2 years	2 to 3 years	3 to 4 years	4 to 5 years	Over 5 years	Non- interest bearing	Total
Assets											
Cash and balances with central banks	-	-	-	-	-	-	-	-	-	5	5
Due from banks and financial institutions	-	-	-	-	-	-	-	-	-	7,017	7,017
Interbank and other money market placements	25,521	-	-	-	-	-	-	-	-	-	25,521
Reserve deposits at central banks	104,527	-	-	_	_	-	-	-	_	11,920	116,447
Trading assets	2,016	642	7,542	576	_	-	745	1,267	2,092	-	14,880
Investment securities	2,117	1,260	7,822	2,160	391	13,174	28,615	2,010	9,651	_	67,200
Loan securities	1,896	-	-	-	202	4,889	-		-	_	6,987
Loans and finance lease receivables	91,792	48,674	51,916	119,165	92,306	80,549	91,567	41,277	205,653	31,025	853,924
Other assets	29,536	-	-	-	-	-	· -	-	-	75,481	105,017
Total assets	257,405	50,576	67,280	121,901	92,899	98,612	120,927	44,554	217,396	125,448	1,196,998
Liabilities											
Other money market deposits	6,717	-	-	-	-	-	-	-	-	-	6,717
Funds borrowed	96,321	28,234	301,722	22,662	29,292	29,292	29,292	29,292	105,607	-	671,714
Trading liabilities	449	2,364	254	-	-	-	-	-	-	-	3,067
Debt securities issued	-	55,153	55,711	-	-	-	-	-	-	-	110,864
Other liabilities (1)	14,541	5,519	-	-	-	-	1,355	-	-	35,537	60,019
Total liabilities	118,028	91,270	357,687	22,662	29,292	29,292	30,647	29,292	105,607	35,537	849,314
Financial position interest sensitivity gap	139,377	(40,694)	(290,407)	99,239	63,607	69,320	90,280	15,262	111,789	89,911	347,684
Off-balance sheet interest sensitivity gap, net	-	-	-	-	-	-	-	-	-	-	-
Total interest sensitivity gap	139,377	(40,694)	(290,407)	99,239	63,607	69,320	90,280	15,262	111,789	89,911	347,684

⁽¹⁾ Other liabilities comprise trading liabilities, other liabilities and provisions.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

2. Financial risk management (continued)

Cash flow and fair value interest rate risk (continued)

	Up to	1 to 3	3 to 6	6 months	1 to 2	2 to 3	3 to 4	4 to 5	Over 5	Non interest	
31 December 2017	1 month	months	months	to 1 year	years	years	years	years	years	bearing	Total
Assets											
Cash and balances with central banks	-	-	-	-	-	-	-	-	-	6	6
Due from banks and financial institutions	-	-	-	-	-	-	-	-	-	9,643	9,643
Interbank and other money market placements	229,487	6,258	-	-	-	-	-	-	-	-	235,745
Reserve deposits at central banks	35,489	-	-	-	-	-	-	-	-	34,023	69,512
Trading assets	663	4,511	321	56	-	-	-	1,267	668	-	7,486
Investment securities	4,593	2,397	4,242	-	1,015	7,277	22,709	10,230	8,023	-	60,486
Loaned securities	133	182	701	-	-	7,521	1,864	-	3,777	-	14,178
Loans and finance lease receivables	133,965	101,133	55,347	67,464	133,704	73,576	93,537	36,337	201,171	32,473	928,707
Other assets	2,043	-	25,793	2,207	-	-	-	-	-	77,230	107,273
Total assets	406,373	114,481	86,404	69,727	134,719	88,374	118,110	47,834	213,639	153,375	1,433,036
Liabilities											
Other money market deposits	30,177	-	_	_	-	-	-	_	-	-	30,177
Funds borrowed	5,122	19,739	63,177	39,197	27,176	27,176	27,176	27,176	103,089	-	339,028
Debt securities issued	49,830	587,913	-	-	-	-	-	-	-	-	637,743
Trading liabilities	2,099	2,327	-	-	-	-	-	-	-	-	4,426
Other liabilities	12,667	13,199	-	-	-	-	1,280	-	-	27,932	55,078
Total liabilities	99,895	623,178	63,177	39,197	27,176	27,176	28,456	27,176	103,089	27,932	1,066,452
Financial position interest sensitivity gap	306,478	(508,697)	23,227	30,530	107,543	61,198	89,654	20,658	110,550	125,443	366,584
Off-balance sheet interest sensitivity gap, net	-	-	-	-	-	-	-	-	-	-	-
Total interest sensitivity gap	306,478	(508,697)	23,227	30,530	107,543	61,198	89,654	20,658	110,550	125,443	366,584

⁽¹⁾ Other liabilities comprise trading liabilities, other liabilities and provisions.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Cash flow and fair value interest rate risk (continued)

As at 31 March 2018 and 31 December 2017, the effective interest rate applied on balance sheet items summarised as follows:

31 March 2018 (%)	TL	USD	EUR	CHF	JPY	GBP
Due from banks and financial institutions	13.55	_	-	-	_	-
Interbank and other money market placements	15.82	-	_	-	_	-
Fair value through other comprehensive income	6.49	-	_	-	_	-
Loans and finance lease receivables						
- Corporate loans	17.12	7.56	5.66	-	_	-
- Retail loans	18.44	-	-	7.53	-	11.28
Other money market deposits	8.97	-	-	-	-	_
Funds borrowed and debt securities issued	15.50	5.25	2.77	-	-	-
Current account of loan customers (1)	9.65	5.75	-	-	-	-
31 December 2017 (%)	TL	USD	EUR	CHF	JPY	GBP
Due from banks and financial institutions	11.02	0.51	-	-	-	_
Interbank and other money market placements	14.99	-	-	-	-	-
Marketable securities (Investment and trading)	13.95	5.00	-	-	-	-
Loans and finance lease receivables						
- Corporate loans	17.95	7.51	5.67	-	-	-
- Retail loans	18.52	9.84	-	7.58	8.85	11.53
Other money market deposits	8.97	-	-	_	_	-
Funds borrowed and debt securities issued	14.36	3.71	3.45	-	-	-
Current account of loan customers (1)	7.68	5.75	-	-	-	_

⁽¹⁾ Included in other liabilities.

Internal capital adequacy assessment process

Within the risk management framework of the Bank, a comprehensive internal capital adequacy assessment process ("ICAAP") is performed which is reviewed and approved by Board of Directors since 2009.

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

12. Financial risk management (continued)

Cash flow and fair value interest rate risk (continued)

Exposure to interest rate risk – non-trading portfolios

Interest rate sensitivity of the banking book is calculated as the difference of discounted cash flows of assets and liabilities. With this method, the future changes of interest rates and their effects on the cash flow of asset and liabilities are simulated and the influence of these changes on the interest income and equity of the Bank is assessed. The exercise is subject to PV01 and worst case scenario limit which are (1) 100 bps parallel shift of yield curves and (2) worst case shifts of yield curves which refer to parallel and non-parallel (flattening and steepening) shift of TL (500 bps) and foreign currency (200 bps) yield curves. Limits are determined on ALCO and Board of Directors levels and subject to Board of Directors monthly review.

	31 March	31 December
Change at portfolio value/Total equity (%)	2018	2017
Local TL interest rate		
+500 bps	(0.42)	(1.01)
-400 bps	0.82	1.65
Foreign currency interest rate		
+200 bps EUR	2.78	2.73
-200 bps EUR	(0.64)	(0.53)
+200 bps USD	(4.42)	(5.20)
-200 bps USD	4.99	5.93

Capital adequacy

To monitor the adequacy of its capital, the Group uses ratios established by BRSA. These ratios measure capital adequacy (minimum 8% as required by Banking Law) by comparing the Group's eligible capital with its financial position assets, off-balance sheet commitments and market and other risk positions at weighted amounts to reflect their relative risk. The regulatory capital and the capital adequacy ratio declared by the Group as 31 March 2018 and 31 December 2017 is as follows:

	31 March 2018	31 December 2017
Amount subject to credit risk (I)	1,083,809	1,185,381
Amount subject to market risk (II)	355,000	487,500
Amount subject to operational risk (III)	71,057	101,181
Total risk-weighted assets, value at market risk and	·	
operational risk (IV) = (I+II+II)	1,509,866	1,774,062
Capital for the purpose of calculating the capital adequacy rat	343,621	342,116
Capital adequacy ratio	29.04%	25.81%

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

13. Fair value of financial and non-financial instruments

Valuation of assets measured at fair value

This table below analyses financial and non-financial instruments measured at fair value at the end of the reporting period, by the level in the fair value hierarchy into which the fair value measurement is categorised. The amounts are based on the values recognised in the statement of financial position.

31 March 2018	Level 1	Level 2	Level 3	Total
Non-financial instruments				
Non-financial instruments			50.270	50.070
Investment property	-	-	58,279	58,279
Financial instruments				
Trading assets	5,519	9,361	_	14,880
Investment and loaned securities	74,187	-	-	74,187
	79,706	9,361	58,279	147,346
	77,700	7,001	20,277	117,610
Financial instruments				
Trading liabilities	-	3,067	-	3,067
	-	3,067	-	3,067
31 December 2017	Level 1	Level 2	Level 3	Total
Non-financial instruments				
Investment property	-	-	58,279	58,279
Financial instruments	2 200	£ 100		7 106
Trading assets	2,298	5,188	-	7,486
Investment and loaned securities	74,664	-	-	74,664
	76,962	5,188	58,279	140,429
Financial instruments				
Trading liabilities	-	4,426	-	4,426
	-	4,426	-	4,426

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

14. Operating segments

The Group has four reportable segments, namely headquarter and treasury, corporate banking, retail banking, and non-financial services (includes activities of C Bilişim), which are the Group's strategic business units. The strategic business units offer different products and services, and are managed separately based on the Group's management and internal reporting structure. The following table summarises the Group's operating segments details.

	Asset management and			Non-financial	
31 March 2018	treasury	Corporate banking	Retail banking	services	Total
Interest income	12,492	13,993	17	189	26,691
Interest expense	(16,019)	(414)	-	_	(16,433)
Internal transfer rate income/(expense)	14,252	(14,192)	(60)	-	_
Net interest income	10,725	(613)	(43)	189	10,258
Net fee and commission income / (expense)	(78)	1,774	(1)	-	1,695
Net trading income and foreign exchange gain, net	1,688	2	-	2	1,692
Other operating income	(400)	(2,633)	3,058	69	94
Total operating income	11,935	(1,470)	3,014	260	13,739
Net impairment loss on financial and non-financial assets	(1,075)	4,008	86	-	3,019
Total operating expenses	(5,301)	(6,552)	(1,873)	(188)	(13,914)
Profit / (loss) before income tax	5,559	(4,014)	1,227	72	2,844
Income tax	(931)	-	-	297	(634)
Net profit/(loss) for the period	4,628	(4,014)	1,227	369	2,210
Total assets	69,085	1,104,644	16,726	6,543	1,196,998
Total liabilities	780,564	67,433	1,099	218	849,314

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

14. Operating segments (continued)

	Headquarter			Non-financial	
31 March 2017	and treasury	Corporate banking	Retail banking	services	Total
Interest income	2,501	24,949	568	138	28,156
Interest expense	(16,852)	(389)	-	-	(17,241)
Internal transfer rate income/(expense)	13,282	(13,166)	(116)	-	-
Net interest income	(1,069)	11,394	452	138	10,915
Net fee and commission income / (expense)	(6)	880	(116)	-	758
Net trading income and foreign exchange gain, net	592	(66)	-	5	531
Other operating income	200	(1,478)	1,530	170	422
Total operating income	(283)	10,730	1,866	313	12,626
Net impairment loss on financial and					
non-financial assets	(598)	1,674	882	-	1,958
Total operating expenses (unallocated + allocated) Income from capital allocation	(2,036)	(6,014)	(4,660)	(404)	(13,114)
Profit / (loss) before income tax	(2,917)	6,390	(1,912)	(91)	1,470
Income tax	(189)	-	-	72	(117)
Net profit/(loss) for the period	(3,106)	6,390	(1,912)	(19)	1,353
Total assets	295,611	1,114,254	16,726	6,445	1,433,036
Total liabilities	997,727	67,433	1,099	193	1,066,452

Notes to the Condensed Consolidated Interim Financial Information As of and for the period ended 31 March 2018

(Currency - In thousands of Turkish Lira)

15. Rating

As at 31 March 2018, the Bank's ratings assigned by international rating agency, Fitch Ratings is as follows:

Fitch Ratings, January 2018

Long Term Foreign Currency IDR BBB- (Stable)

Short Term Foreign Currency IDR F3
Support 2

Long Term Local Currency IDR BBB- (Stable)

Short Term Local Currency F3

National AA + (tur) (Stable)

16. Subsequent and other events

None.