HSBC BANK ANONİM ŞİRKETİ

CONSOLIDATED FINANCIAL STATEMENTS
FOR THE YEAR ENDED 31 DECEMBER 2018
TOGETHER WITH INDEPENDENT AUDITOR'S REPORT

pwc

INDEPENDENT AUDITOR'S REPORT

To the Board of Directors of HSBC Bank A.Ş.

Our Opinion

In our opinion, the consolidated financial statements present fairly, in all material respects, the consolidated financial position of HSBC Bank A.Ş. (the "Bank") and its subsidiaries (together 'the Group') as at 31 December 2018 and 31 December 2017, and their consolidated financial performance and their consolidated cash flows for the years then ended in accordance with International Financial Reporting Standards ("IFRS").

What we have audited

The Group's consolidated financial statements comprise:

- the consolidated statement of financial position as at 31 December 2018 and 31 December 2017;
- the consolidated statement of income for the years then ended;
- the consolidated statement of comprehensive income for the years then ended;
- the consolidated statement of changes in shareholder's equity for the years then ended;
- the consolidated statement of cash flows for the years then ended; and
- the notes to the consolidated financial statements, which include significant accounting policies.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing ("ISA"). Our responsibilities under those standards are further described in the *Auditor's responsibilities for the audit of the consolidated financial statements* section of our report.

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

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Independence

We are independent of the Group in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants ("IESBA Code") and "Independence Audit by-Law" published by the Public Oversight Accounting and Auditing Standards Authority ("POA"), independent auditing requirements referred to in Article 400 of the Turkish Commercial Code ("TCC"), "Regulation on Independent Audit of Banks" published by the Turkish Banking Regulation and Supervision Agency on the Official Gazette No.29314 dated 2 April 2015 and Communiqué Series: X No: 22 on "Principles Regarding Independent Auditing Standards in the Capital Markets" (collectively referred to as "Turkish Local Independences Rules"). We have fulfilled our other ethical responsibilities in accordance with these requirements.

Our audit approach

As part of designing our audit, we determined materiality and assessed the risks of material misstatement in the consolidated financial statements. In particular, we considered where management made subjective judgements; for example, in respect of significant accounting estimates that involved making assumptions and considering future events that are inherently uncertain. As in all of our audits, we also addressed the risk of management override of internal controls, including among other matters, consideration of whether there was evidence of bias that represented a risk of material misstatement due to fraud.

We tailored the scope of our audit in order to perform sufficient work to enable us to provide an opinion on the consolidated financial statements as a whole, taking into account the structure of the Group, the accounting processes and controls, and the financial services industry in which the Group operates.

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

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

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

Those charged with governance are responsible for overseeing the Group's financial reporting process.

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

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

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

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

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

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

PwC Bağımsız Denetim ve
Serbest Muhasebeci Mali Müşavirlik A.Ş.

Zeynep Uras, SMMM
Partner

Istanbul, 5 November 2019

HSBC BANK A.Ş.

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HSBC BANK A.Ş.

CONSOLIDATED BALANCE SHEET AT 31 DECEMBER 2018

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise indicated.)

	Note	31 December 2018	31 December 2017
ASSETS			
Cash balances and demand deposits with central banks	6	4,736,023	2,615,851
Restricted deposits with the Central Bank	6	1,329,432	1,287,604
Loans and advances to banks	7	8,470,450	2,166,192
Financial assets measured at fair value through profit or loss			
- Trading securities	8	27,013	278,421
- Trading derivatives	9	1,001,127	680,529
- Equity Instruments	8	20,223	-
Loans and advances to customers	10	14,821,002	15,358,152
Financial assets measured at fair value through OCI	11	511,129	-
Available-for-sale investment securities	11	-	1,363,506
Intangible assets	12	150,954	147,930
Property and equipment	13	101,877	82,671
Deferred income tax assets	18	240,995	199,829
Other assets	14	662,285	264,763
Total assets		**32,072,510**	**24,445,448**
LIABILITIES			
Deposits from banks	15	1,876,508	1,509,403
Deposits from customers	16	22,977,440	14,838,829
Other borrowed funds	17	2,783,586	3,704,777
Trading derivative liabilities	9	941,094	739,860
Income taxes payable	18	4,103	1,044
Other provisions	19	147,316	179,315
Employee benefit provisions/reserves	20	131,632	107,499
Other liabilities	21	611,169	536,201
Total liabilities		**29,472,848**	**21,616,928**
EQUITY			
Share capital	22	939,625	939,625
Statutory and other reserves	23	124,947	152,120
Retained earnings	23	1,535,090	1,736,775
Equity attributable to shareholders of the Bank		**2,599,662**	**2,828,520**
Non-controlling interests in equity		-	-
Total equity		**2,599,662**	**2,828,520**
Total liabilities and equity		**32,072,510**	**24,445,448**
Commitments and contingencies	**29**	**3,658,162**	**2,797,128**

The accompanying notes set out on pages 5 to 73 form an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF CHANGES IN EQUITY
FOR THE YEAR ENDED 31 DECEMBER 2018

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise indicated.)

	Note	31 December 2018	31 December 2017
Interest income	24	3,027,592	2,259,830
Interest expense	24	(1,555,025)	(880,894)
Net interest income		**1,472,567**	**1,378,936**
Fee and commission income	25	480,382	428,329
Fee and commission expense	25	(41,336)	(41,512)
Net fee and commission income		**439,046**	**386,817**
Net trading expense	26	(391,160)	(510,275)
Other operating income		93,246	59,351
Operating income		**1,613,699**	**1,314,829**
Net impairment losses	28	(403,492)	(76,469)
Personnel expenses	27	(459,738)	(458,859)
Depreciation and amortisation	27	(44,178)	(40,352)
Other operating expenses	27	(569,910)	(557,750)
Profit before income tax		**136,381**	**181,399**
Income tax	18	(43,336)	187,735
Profit for the year		**93,045**	**369,134**
Other comprehensive income:			
Items that are or may be reclassified to profit or loss			
Net losses on Financial assets measured at fair value through OCI		**(30,217)**	**(18,128)**
- Unrealised net (losses)/gains arising during the year, before tax		7,554	(15,335)
- Net reclassification adjustments for realised net losses, before tax		(37,771)	(2,793)
Cash flow hedges		**(2,831)**	**2,434**
- Net losses arising on hedges recognised during the year, before tax		(6,185)	(1,480)
- Net amount reclassified to the statement of income, before tax		3,354	3,914
Items that are or may not be reclassified to profit or loss			
Actuarial gain/(loss) related to employee benefits		**3,124**	**(6,863)**
Income tax relating to components of other comprehensive income	**18**	**6,557**	**4,512**
Other comprehensive loss for the year, net of tax		**(23,367)**	**(18,045)**
Total comprehensive profit for the year		**69,678**	**351,089**
Total comprehensive income attributable to:			
Shareholders of the Bank		69,678	351,089
Non-controlling interest		-	-
Basic and diluted profit per share attributable to the equity holders of the Bank (expressed in TL per thousand share)	2	0.001426	0.005659

The accompanying notes set out on pages 5 to 73 form an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF CHANGES IN EQUITY
FOR THE YEAR ENDED 31 DECEMBER 2018

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise indicated.)

	Attributable to owners of the Bank						
	Share Capital	**Legal Reserves**	**Statutory Reserves**	**Retained earnings**	**Total**	**Non controlling interest**	**Total equity**
Balance at 1 January 2017	**939,625**	**203,478**	**(24,869)**	**1,359,197**	**2,477,431**	**-**	**2,477,431**
Profit for the year	-	-	-	369,134	369,134	-	369,134
Other comprehensive expense for the year	-	-	(18,045)	-	(18,045)	-	(18,045)
Total comprehensive profit for the year	**-**	**-**	**(18,045)**	**369,134**	**351,089**	**-**	**351,089**
Transfer to statutory reserves	-	(8,444)	-	8,444	-	-	-
Balance at 31 December 2017	**939,625**	**195,034**	**(42,914)**	**1,736,775**	**2,828,520**	**-**	**2,828,520**
Balance at 1 January 2018	**939,625**	**195,034**	**(42,914)**	**1,736,775**	**2,828,520**	**-**	**2,828,520**
Effects of changes in accounting policies	-	-	(5,846)	(262,690)	(268,536)	-	(268,536)
Restated Balance at 1 January 2018	**939,625**	**195,034**	**(48,760)**	**1,474,085**	**2,559,984**	**-**	**2,559,984**
Profit for the year	-	-	-	93,045	93,045	-	93,045
Other comprehensive expense for the year	-	-	(23,367)	-	(23,367)	-	(23,367)
Total comprehensive profit for the year	**-**	**-**	**(23,367)**	**93,045**	**69,678**	**-**	**69,678**
Transfer to statutory reserves	-	2,040	-	(2,040)	-	-	-
Dividend paid	-	-	-	(30,000)	(30,000)	-	(30,000)
Balance at 31 December 2018	**939,625**	**197,074**	**(72,127)**	**1,535,090**	**2,599,662**	**-**	**2,599,662**

The accompanying notes set out on pages 5 to 73 form an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED 31 DECEMBER 2018

(Amounts expressed in thousands of Turkish Lira ("TL") unless otherwise indicated.)

	Note	31 December 2018	31 December 2017
Cash flows from operating activities			
Net profit for the year		93,045	369,134
Adjustments for non-cash items:			
Unrealised gain/ (loss) on trading securities, net		(1,120)	(1,236)
Impairment losses	28	403,492	76,469
Fx gain/ (loss) from impairments		(37,830)	(10,009)
Measurement of derivative financial instruments at fair value		(119,364)	364,022
Amortisation of intangible assets	27	21,287	16,465
Depreciation of property and equipment	27	22,852	23,887
Provision for current and deferred income taxes		43,336	(187,735)
Other provisions		5,832	(21,658)
Provision for employee benefits		24,172	11,189
Unearned commission income		(6,301)	(28,672)
Interest income – net		(1,472,567)	(1,378,936)
Interest paid		(1,410,763)	(838,663)
Interest received		2,957,269	2,343,303
Cash flows from operating profits before changes in operating assets and liabilities		**523,340**	**737,560**
Changes in :			
Balances with central banks		(28,469)	313,563
Loans and advances to banks		(11,247)	(2,066)
Trading securities		230,894	(186,605)
Loans and advances to customers		255,940	(1,482,793)
Other assets		(366,871)	94,012
Deposits from banks		367,105	809,977
Deposits from customers		8,027,548	(123,959)
Other liabilities		128,980	(857,668)
		9,127,220	**(697,979)**
Income taxes paid		**(110,173)**	**(24,052)**
Net cash generated / (used) in operating activities		**9,017,047**	**(722,031)**
Cash flows from investing activities:			
Purchase of property and equipment		(50,157)	(34,931)
Proceeds from the sale of property and equipment		8,099	11,090
Purchase of intangible assets, net		(24,311)	(36,260)
Purchase of investment securities		(147,633)	(1,591,084)
Redemption of investment securities		903,718	1,498,283
Net cash used in investing activities		**689,716**	**(152,902)**
Cash flows from financing activities			
Proceeds from borrowed funds		596,445	730,457
Repayments of borrowed funds		(1,891,720)	(609,000)
Net cash used in financing activities		**(1,295,275)**	**121,457**
Net (decrease)/increase in cash and cash equivalents		**8,411,488**	**(753,476)**
Effects of foreign exchange-rate changes on cash and cash equivalents		1,695	(2,792)
Cash and cash equivalents at beginning of the year	5	4,775,462	5,531,730
Cash and cash equivalents at year end	**5**	**13,188,645**	**4,775,462**

The accompanying notes set out on pages 5 to 73 form an integral part of these consolidated financial statements.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 1 - GENERAL INFORMATION

It has been approved by the decision of the Council of Ministers dated 27 June 1990 and numbered 90/644 that HSBC Bank A.Ş. ("the Bank", "the Parent Bank", "HSBC Bank") was established to conduct banking activities and the articles of association published in the Official Gazette No. 2611 dated 18 September 1990. The Parent Bank is a foreign-capitalized bank which has been registered in accordance with the Law on Encouraging Foreign Investments numbered 6224. On 20 September 2001 the 'Share Sales Agreement' regarding the sale of all shares of Demirbank T.A.Ş. which was under in Saving Deposit Insurance Fund was signed by the Bank's main shareholder HSBC Bank Plc. According to this agreement the required procedures shall be completed by 31 October 2001 and all shares of the Demirbank T.A.Ş., together with a part of the assets and liabilities shall be transferred to HSBC Bank Plc on 31 October 2001. In 14 December 2001, Demirbank T.A.Ş. and the Bank merged under the name of HSBC Bank Anonim Şirketi and continued its activities. Based on the approval of the Banking Regulation and Supervision Agency dated 21 June 2017, 10.01% share of HSBC Bank Plc.'s 100% ownership of the Bank's capital was transferred to HSBC Bank Middle East Limited and remaining 89.99% share of HSBC Bank Plc. was transferred to HSBC Middle East Holdings B.V. through share transfer agreement dated 29 June 2017.

The Bank is registered in Istanbul, Turkey at the following address: Büyükdere Caddesi No: 128 D Blok 34394, Esentepe, Şişli, Istanbul.

The Bank and the Bank's subsidiary, HSBC Yatırım Menkul Değerler A.Ş. ("HSBC Yatırım"), HSBC Yatırım's subsidiary, HSBC Portföy Yönetimi A.Ş. ("HSBC Portföy") and HSBC Ödeme Sistemleri ve Bilgisayar Teknolojileri Basın Yayın ve Müşteri Hizmetleri A.Ş. are in the consolidation scope ("the Group"). HSBC İnternet ve Telekomunikasyon Hizmetleri A.Ş.'s Liquidation process has been finalized on 16 August 2017.

As of 31 December 2018, the Group has 2,258 employees (31 December 2017: 2,533 employees).

As of 31 December 2018, the Parent Bank has 82 branches dispersed throughout the country (31 December 2017: 82 branches).

As of 31 December 2018 the consolidated subsidiaries, the Bank's share percentage and the Bank's risk group share percentage are as follows:

	Title	Address (City / Country)	Bank's share percentage - If different voting percentage (%)	Bank's risk group share percentage (%)
1	HSBC Yatırım ve Menkul Değerler A.Ş.	Esentepe Mahallesi Büyükdere Caddesi No:128 Şişli 34394, İSTANBUL	99.87	0.13
2	HSBC Ödeme Sistemleri ve Bilgisayar Teknolojileri Basın Yayın ve Müşteri Hizmetleri A.Ş	Esentepe Mahallesi Büyükdere Caddesi No:128 Şişli 34394, İSTANBUL	100.00	-

NOTE 2 – SIGNIFICANT ACCOUNTING POLICIES

2.1 Basis of preparation

These consolidated financial statements have been prepared in accordance with International Financial Reporting Standards (IFRS). These financial statements have been prepared under the historical cost convention, except for those assets and liabilities measured at fair value.

The Company and its subsidiaries which are incorporated in Turkey maintain their books of account and prepare their statutory financial statements in accordance with the regulations on accounting and reporting framework and accounting standards which are determined by the provisions of Turkish Banking Law and accounting standards promulgated by the other relevant laws and regulations. The consolidated financial statements have been prepared in accordance with IFRS and presented in Turkish Lira ("TL"). For the purpose of fair presentation in accordance with IFRS, certain adjustments and reclassifications have been made to the statutory financial statements.

These consolidated financial statements have been approved by the Board of Directors on 5 November 2019.

2.2 Summary of Significant Accounting Policies, Judgments and Estimates

2.2.1 Use of estimates and judgements

The preparation of the consolidated financial statements in accordance with IFRS requires management to make estimates and assumptions that affect the application of policies and in the measurement of income and expenses in the profit and loss statement and in the carrying value of assets and liabilities in the statement of financial position, and in the disclosure of information in the notes to the financial statements.

The estimates and associated assumptions are based on historical experience and various other factors that are believed to be reasonable under the circumstances, the results of which form the basis of making judgments about carrying values of assets and liabilities that are not readily apparent from other sources. The actual results may differ from these estimates. Estimates and underlying assumptions are reviewed on an on-going basis. Revisions to accounting estimates are recognized in the year in which the estimate is revised.

The areas involving a higher degree of judgement or complexity, or areas where assumptions and estimates are significant to the consolidated financial statements are disclosed in Note 3.

2.2.2 Foreign Currency Translation

a. Functional and presentation currency

Items included in the financial statements of each of the Group's entities are measured using the currency of the primary economic environment in which the entity operates ("the functional currency").

The consolidated financial statements are presented in Turkish Lira ("TL"), which is the Bank's and Group's functional currency.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

b. Transactions and balances

Transactions are recorded in TL, which represents its functional currency. Transactions in foreign currencies are translated into the functional currency of the Bank at exchange rates ruling at the dates of the transactions. Monetary assets and liabilities denominated in foreign currencies are converted into TL at the exchange rates ruling at balance sheet date with the resulting exchange differences recognized in the statement of comprehensive income as foreign exchange gain or loss. Gains and losses arising from foreign currency transactions are reflected in the consolidated statement of comprehensive income as realized during the year.

2.2.3 Consolidation

The consolidated financial statements comprise the financial statements of the Bank and all its subsidiaries, drawn up to 31 December 2018.

a. Subsidiaries

Subsidiaries are the entities controlled by the Bank. The control exists if and only if; 1) when the Bank has the power over an affiliate which that power, directly or indirectly, give rights to govern the financial and operating policies of the entity so as to obtain benefits from its activities, 2) exposure, or rights, to variable returns from its involvement with the affiliate, 3) the ability to use its power over the affiliate to affect the amount of its returns. The Bank re-assess its control power over its subsidiaries if there is an indication that there are changes to any of the three elements of control. The financial statements of subsidiaries are included in the consolidated financial statements from the date that control commences until the date that control ceases. Subsidiaries are fully consolidated from the date of acquisition, being the date on which control is transferred to the Group and cease to be consolidated from the date on which control is transferred out of the Group.

The balance sheets and statements of comprehensive income of the subsidiaries are consolidated on a line-by-line basis and the carrying value of the investment held by the Bank and its subsidiaries is eliminated against the related equity. Intercompany transactions and balances between the Group companies are eliminated on consolidation. The dividends arising from subsidiaries are eliminated from profit of the year.

The financial statements of the subsidiaries are prepared using the consistent accounting policies with the Bank.

Accounting policies of subsidiaries have been changed where necessary to ensure consistency with the policies adopted by the Group.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

The list of principal subsidiaries at 31 December 2018 and 2017 is as follows:

Name of subsidiary	Country of incorporation	Nature of business	31 December 2018 Bank's shareholding (%)	31 December 2017 Bank's shareholding (%)
HSBC Yatırım Menkul Değerler A.Ş. ("HSBC Yatırım")	Turkey	Investment management	99.87	99.87
HSBC Portföy Yönetimi A.Ş. ("HSBC Portföy")	Turkey	Portfolio management	100.00	100.00
HSBC Ödeme Sistemleri ve Bilgisayar Teknolojileri Basın Yayın ve Müşteri Hizmetleri A.Ş.	Turkey	Technology	100.00	100.00

HSBC Yatırım was established on 29 January 1997 and to engage mainly in purchasing, selling and investing in any kind of securities, stocks, treasury bills and government bonds provided from capital markets; to manage mutual funds and to make transactions as an intermediary.

HSBC Portföy was established in August 2003 as an affiliate of HSBC Yatırım in order to engage in the portfolio management of domestic and international funds, post-employment benefit plans funds and portfolio management of domestic and international real and juristic persons.

b. Fund management

The Group manages and administers open-ended mutual funds and private pension funds. The financial statements of these entities are not included in these consolidated financial statements. Information about the Group's funds management is set out in Note 32.

2.2.4 Related parties

For the purpose of these consolidated financial statements, shareholders, companies controlled by or affiliated with them and their ultimate owners, directors and executive officers are considered and referred to as related parties (Note 31).

2.2.5 Financial assets

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 recognize 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 Group management and the nature of contractual cash flows of the financial asset are taken into consideration. When the business model determined by the Parent 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

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

a. Financial Assets at 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.

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.

“Unrealized gains and losses” arising from changes in the fair value of financial assets classified as financial assets at fair value through other comprehensive income are recognized in the shareholders’ equity as “Other accumulated comprehensive income that will be reclassified in profit or loss”, until the related fair value differences accumulated in the shareholders’ equity are transferred to the income statement. Interest and dividends received from financial assets at fair value through other comprehensive income are recorded in interest income and dividend income as appropriate.

During initial recognition an entity can choose in an irrevocable was 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.

All equity instruments class classified as fair value through other comprehensive income are measured at fair value. However, in limited circumstances, cost may be an appropriate estimate of fair value. That may be case if insufficient more recent information is available to measure fair value, or if there is a wide range of possible fair value measurements and cost represents the best estimate of fair value within the range.

c. Financial Assets Measured at Amortised Cost

Financial assets that are held for collection of contractual cash flows where those cash flows represent solely payments of principal and interest are classified as financial assets measured at amortised cost. These financial assets are initially recognized at total of acquisition and transaction cost. After their initial recognition, they are carried at “Amortised Cost” using the “effective interest method”. Group’s loans are recorded under the “Measured at Amortised Cost” account. As of 31 December 2018 and 31 December 2017, the Group has no marketable securities measured at amortised cost.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

2.2.6 Financial assets – Explanations on prior period not valid for the current period

The Group categorizes its financial assets as fair value through profit/loss, financial assets as available for sale and loans and other receivables. Financial assets in subject recognized and derecognized according to their transaction dates.

a. Financial Assets at Fair Value through Profit or Loss

Financial assets at fair value through profit or loss consist of trading financial assets and financial assets at fair value through profit or loss. They are initially recognised at cost and subsequently re-measured at their fair value. While determining the fair value, the average price comprising in the active market is used and the gains and losses generated is recognized in the income statement.

b. Available-for-Sale Financial Assets

Available-for-sale financial assets are defined as financial assets other than the ones classified as "Loans and receivables", "Held-to-maturity assets" or "Financial asset at fair value through profit or loss". Financial assets available for sale are measured at fair value. Unrealized gains and losses arising from the changes in the fair value of financial assets available for sale with fixed maturity and certain cash flow are recognised at "Marketable Securities Valuation Differences" under the shareholders' equity. The interest income which is calculated with the effective interest rate method is recognised in the income statement. When these securities are disposed of, the related fair value differences accumulated in the shareholders' equity are transferred to the income statement. Available-for-sale equity securities that have a quoted market price in an active market and whose fair values can be reliably measured are carried at fair value and mentioned valuation differences are recognised at "Marketable Securities Valuation Differences". Available-for-sale equity securities that do not have a quoted market price in an active market and whose fair values cannot be reliably measured are carried at cost, less provision for impairment.

c. Loans and Receivables:

Loans and advances to customers are recorded when the Group advances money to purchase or originate an unquoted non-derivative receivable from a customer due on fixed or determinable dates and has no intention of trading the receivable. Loans and advances to customers are carried at amortised cost less allowance for impairment. When impaired financial assets are renegotiated and the renegotiated terms and conditions differ substantially from the previous terms, the original asset is derecognised and new asset is initially recognised at its fair value.

Group holds appropriate collateral for each loan according to its specified risk and the relevant BRSA communiqués. The collateral strategy differentiates between collateral types on the basis of customers' ratings and loan terms. In general, the types of collaterals are cash collaterals, mortgages, guarantees, securities issued by the Turkish Treasury Undersecretaries and the Central Bank of Turkey and pledge on assets.

d. Investment Securities Held-to-Maturity:

Investment securities held-to-maturity are financial assets that are not classified under loans and receivables and have fixed maturities and fixed or pre-determined payments where management has the intent and ability to hold the financial assets until maturity. Investment securities held-to-maturity are initially recognized at cost, and subsequently carried at amortized cost using the effective interest rate method; interest earned whilst holding investment securities held-to-maturity is reported as interest income and impairment for these financial assets recognized in the income statement.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

2.2.7 Financial liabilities

Financial liabilities including deposits from banks, deposits from customers and other borrowed funds are recognised initially at fair value, net of transaction costs. Subsequently, financial liabilities are carried at amortised cost, net of transaction costs, and any difference between the amount at initial recognition and the redemption value is recognised in profit and loss over the period of the financial liability using the effective interest method.

2.2.7 Sale and repurchase agreements

Securities subject to repurchase agreements ("Repo") are classified as "Financial assets at fair value difference through profit or loss", "Financial assets at fair value difference through other comprehensive income" in the balance sheet according to the investment purposes and measured according to the portfolio of the Group to which they belong. Funds obtained under repurchase agreements are accounted under "Funds provided under repurchase agreements" in liability accounts and differences between the sale and repurchase prices determined by these repurchase agreements are accrued evenly over the life of the repurchase agreement using the "Effective interest (internal return) method". Funds given against securities purchased under agreements to resell ("Reverse repo") are accounted under "Loans and advances to Banks" in the balance sheet. The difference between the purchase and resell price determined by these repurchase agreements is accrued evenly over the life of repurchase agreements using the "Effective interest rate method". Group has no securities lending transactions.

2.2.8 Impairment of financial assets

a. Assets carried at amortized cost

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

Group considers evidence of impairment at both a specific asset and collective level. All individually significant financial assets are assessed for specific impairment. All significant assets found not to be specifically impaired are then collectively assessed for any impairment that has been incurred but not yet identified. Assets that are not individually significant are then collectively assessed for impairment by grouping together financial assets (carried at amortised cost) with similar risk characteristics. Assets that are individually assessed for impairment and for which an impairment loss is or continues to be recognised are not included in a collective assessment of impairment.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Objective evidence that a financial asset or group of assets is impaired includes observable data that comes to the attention of the Group about the following loss events;

- significant financial difficulty of the issuer or obligor;
- a breach of contract, such as a default or delinquency in interest or principal payments by more than 90 days;
- the Group granting to the borrower, for economic or legal reasons relating to the borrower's financial difficulty, a concession that the lender would not otherwise consider;
- it becoming probable that the borrower will enter bankruptcy or other financial reorganisation;
- the disappearance of an active market for that financial asset because of financial difficulties; or
- observable data indicating that there is a measurable decrease in the estimated future cash flows from a group of financial assets since the initial recognition of those assets, although the decrease cannot yet be identified with the individual financial assets in the group, including:

    1. adverse changes in the payment status of borrowers or
    2. national or local economic conditions that correlate with defaults on the assets in the Group

Individually assessed loans for which no evidence of loss has been specifically identified on an individual basis are grouped together according to their credit risk characteristics for the purpose of calculating an estimated collective loss. This reflects impairment losses that the Bank has incurred as a result of events occurring before the balance sheet date, which the Bank is not able to identify on an individual loan basis, and that can be reliably estimated. These losses will only be individually identified in the future. As soon as information becomes available which identified losses on individual loans within the group, those loans are removed from the group and assessed on an individual basis for impairment.

When a subsequent event causes the amount of impairment loss to decrease, the impairment loss is reversed through profit or loss.

Impairment losses on Financial assets measured at fair value through OCI securities being the difference between the acquisition cost and current fair value are reclassified from other comprehensive income to profit or loss. When a subsequent event causes the amount of impairment loss on an Financial assets measured at fair value through OCI to decrease, the impairment loss is reversed through profit or loss.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

However, any subsequent recovery in the fair value of an impaired available-for-sale equity security is recognised directly in other comprehensive income.

A write off is made when all or part of a loan is deemed uncollectible or in the case of debt forgiveness. Such loans are written off after all the necessary legal and regulatory procedures have been completed and the amount of the loss has been determined. Write offs are charged against previously established allowances and reduce the principal amount of a loan. Subsequent recoveries of amounts written off are included in the consolidated statement of comprehensive income.

b. Assets carried at cost

If there is objective evidence that an impairment loss on an unquoted equity instrument that is not carried at fair value because its fair value cannot be reliably measured, or on a derivative asset that is linked to and must be settled by delivery of such an unquoted equity instrument has been incurred, the amount of the loss is measured as the difference between the asset's carrying amount and the present value of its recoverable amount. There is no impairment recorded related to assets carried at cost.

2.2.9 Derecognition of financial assets and liabilities

Financial assets are derecognised when the contractual rights to receive the cash flows from these assets have ceased to exist or the assets have been transferred and substantially all the risks and rewards of ownership of the assets are also transferred (that is, if substantially all the risks and rewards have not been transferred, the Bank tests control to ensure that continuing involvement on the basis of any retained powers of control does not prevent derecognition). Financial liabilities are derecognised when they have been redeemed or otherwise extinguished.

Financial assets measured at fair value through OCI and financial assets at fair value through profit or loss that are sold are derecognized and corresponding receivables from the buyer for the payment are recognized as at the date the Group commits to sell the assets. The specific identification method is used to determine the gain or loss on derecognition.

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

2.2.10 Derivative financial instruments

In order to reduce the foreign exchange position risk the Parent Bank conducts currency forward purchase and sale transaction agreements, currency swap purchase and sale transaction agreements and option purchase and sale agreements. In order to reduce the interest risk, the Parent Bank conducts interest futures and forward interest rate agreements. The fair value differences of derivative instruments that are reflected in the profit and loss accounts are measured at fair value and associated with income statement during recognition. If the fair value of derivative financial instruments is positive, it is disclosed under the main account "Trading Derivatives at Financial Assets measured at Fair Value through Profit or Loss" and if the fair value difference is negative, it is disclosed under "Trading Derivative Liabilities". Differences arising from the valuation of fair value are reflected in the "Net Trading Income" account under income statement.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

2.2.11 Hedge accounting

Until 30 June 2017, Group applied cash flow hedge accounting by cross currency swap transactions in order to hedge itself from the changes in the interest rates of the fixed-rate time deposits, which have maturity of 1-3 month. Group has performed strength tests for risk protection accounting in balance sheet date, while the effective portions are classified as “Accumulated Other Comprehensive Income or Expense Reclassified through Profit or Loss” in shareholders’ equity, the ineffective portion is recognized at income statement.

In periods where cash flows (interest expense) regarding the risk protected entries, affect the income statements, the loss/gain of the related risk protection tool is reduced from shareholders’ equity and shown in income statement.

If the underlying hedge does not conform to the hedge accounting requirements, according to the adjustments made to the carrying value of the hedged item, for which the risk is hedged by a portfolio hedge, are amortized with the straight line method within the time to maturity and recognized under the “Trading Income”. As of 31 December 2018, no hedge accounting is applied.

2.2.12 Property and equipment

All property and equipment are carried at cost less accumulated depreciation and impairment, if any. Depreciation is calculated using the straight-line method to write down the cost of such assets to their residual values over their estimated useful life as follows:

Buildings	50 years
Motor vehicles	5 years
Other equipment, furniture and fixtures	3 years - 50 years

The assets residual values and useful lives are reviewed, and adjusted if appropriate, at each balance sheet date.

Assets that are subject to depreciation are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An asset’s carrying amount is written down immediately to its recoverable amount if the asset’s carrying amount is greater than its estimated recoverable amount. The recoverable amount is the higher of the asset’s fair value less cost to sell and value in use.

Gains and losses on disposal of property and equipment are determined by reference to their carrying amount and are taken into account for the determination of net profit.

Subsequent expenditures are included in the asset’s carrying amount or are recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the Group and the cost of the item can be measured reliably. The carrying amount of the replaced part is derecognised. All other repair and maintenance costs are charged to other operating expenses during the financial period in which they are incurred.

Leasehold improvements comprise primarily the capitalised branch refurbishment costs.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

2.2.13 Intangible assets

Intangible assets consist of software, rights and trademarks.

Expenditure on internally developed software is recognised as an asset when the Group is able to demonstrate its intention and ability to complete the development and use the software in a manner that will generate future economic benefits, and can reliably measure the costs to complete the development. The capitalised costs of internally developed software include all costs directly attributable to developing the software, and are amortised over its useful life. Internally developed software is stated at capitalised cost less accumulated amortisation and impairment.

Subsequent expenditure on software assets is capitalised only when it increases the future economic benefits embodied in the specific asset to which it relates. All other expenditure is expensed as incurred.

Amortisation is recognised in profit or loss on a straight-line basis over the estimated useful life of the software, from the date that it is available for use. The amortisation periods for intangible assets which approximate the economic useful lives of such assets are 3-5 years.

2.2.14 Accounting for leases

a. Finance leases

Assets acquired under finance lease agreements are capitalised at the commencement of the lease at the fair value of the leased asset, which is the amount of cash consideration given for the leased asset. Lease payments are treated as comprising capital and interest elements; the capital element is treated as reducing the capitalised obligation under the lease and the interest element is charged to income. Depreciation on the leased asset is also charged to income on a straight-line basis over the useful life of the asset. Group has no finance lease activities.

b. Operating leases

Leases where the lessor retains substantially all the risks and benefits of ownership of the asset are classified as operating leases. Operating lease payments are recognized as an expense in profit and loss on a straight-line basis over the lease term. When an operating lease is terminated before the lease period has expired, any payment required to be made to the lessor by way of penalty is recognized as an expense in the period in which the termination takes place.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

2.2.15 Deposits and borrowings

Deposits and borrowings are initially measured at fair value plus transaction costs, and subsequently measured at their amortised cost using the effective interest method.

When the Group sells a financial asset and simultaneously enters into a "repo" or "stock lending" agreement to repurchase the asset (or a similar asset) at a fixed price on a future date, the arrangement is accounted for as a deposit, and the underlying asset continues to be recognised in the consolidated financial statements.

2.2.16 Income taxes

Income tax expense comprises current and deferred tax. Income tax expense is recognised in profit or loss except to the extent that it relates to items recognised directly in equity or other comprehensive income, in which case it is recognised in equity or other comprehensive income.

a. Income taxes payable

Current tax assets and liabilities for the current and prior periods are measured at the amount expected to be recovered from or paid to the taxation authorities. The tax rates and tax laws used to compute the amount are those that are enacted or substantively enacted by the balance sheet date.

Current tax assets and liabilities are offset by the Group when it intends to settle on a net basis and the legal right to offset exists.

Taxes other than on income are recorded within other operating expenses (Note 27).

b. Deferred income taxes

Group calculates and accounts for deferred income taxes for all temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in these financial statements in accordance with "Income Taxes Standard" ("IAS 12"). In the deferred tax calculation, the enacted tax rate, in accordance with the tax legislation, is used as of the balance sheet date. Deferred tax assets and liabilities are presented as net in the financial statements in accordance with IAS 12.

The calculated deferred tax asset and deferred tax liability are presented as net in these financial statements. After net off the net deferred tax asset is presented as deferred tax asset on the balance sheet and net deferred tax liability presented as deferred tax liability on balance sheet.

2.2.17 Retirement benefit obligations

Employment termination benefits represent the present value of the estimated total provision of the future probable obligation of the Group arising from the retirement of the employees calculated in accordance with the Turkish Labour Law. In accordance with existing social legislation and Turkish Labour Law in Turkey, the Group is required to make lump-sum termination indemnities to each employee whose employment is terminated due to retirement or for reasons other than resignation or misconduct and who has completed at least one year of service. Provision is made for the present value of the defined benefit obligation calculated using the projected unit credit method. All actuarial gains and losses are recognised immediately in other comprehensive income.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

2.2.18 Provisions, contingent assets and contingent liabilities

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

Where the effect of the time value of money is material, the amount of a provision shall be the present value of the expenditures expected to be required to settle the obligation. The discount rate reflects current market assessments of the time value of money and the risks specific to the liability. The discount rate shall be a pre-tax rate and shall not reflect risks for which future cash flow estimates have been adjusted.

Possible assets or obligations that arise from past events and whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Group are not included in the consolidated financial statements and are treated as contingent assets or liabilities.

The Group recognized a full provision in its 31 December 2018 financials as part of its strategic actions in the scope of restructuring process. The provision is classified under "Other Provisions" and recognized as an expense in income statement.

2.2.19 Interest income and expense

Interest income and expense are recognised in profit and loss for all instruments measured at amortised cost using the effective interest method.

The effective interest method is a method of calculating the amortised cost of a financial asset or a financial liability and of allocating the interest income or interest expense over the relevant period. The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or, when appropriate, a shorter period to the net carrying amount of the financial asset or financial liability. When calculating the effective interest rate, the Group estimates cash flows considering all contractual terms of the financial instrument but does not consider future credit losses.

2.2.20 Fee and commission income and expense

All fees and commission income/expenses are recognised on an accrual basis in accordance with the matching principle, except for certain commission income and fees for various banking services which are recorded as income at the time of collection. Contract based fees or fees received in return for services such as the purchase and sale of assets on behalf of a third party are recognised as income at the time of collection.

2.2.21 Net trading income

Net trading income includes gains and losses arising from disposals of trading financial assets, financial assets measured at fair value through OCI and gains and losses on trading purpose derivative transactions.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

2.2.22 Share capital and dividends

Share capital is recognized at the nominal amount and amounts received in excess of the par value are recognized in share premium account. Incremental costs directly attributable to the issue of new shares are shown in equity as a deduction, net of tax, from proceeds.

Dividends on ordinary shares are recognised in equity in the period in which they are approved by the Bank's shareholders. Dividends for the year that are declared after the balance sheet date are disclosed within the post balance sheet events note.

2.2.23 Acceptances

Acceptances comprise undertakings by the Group to pay bills of exchange drawn on customers, if the latter fails to meet their obligation. Acceptances are accounted for as off-balance sheet transactions.

2.2.24 Other credit related commitments and financial guarantee contracts

In the normal course of business, the Group enters into other credit related commitments including loan commitments, letters of credit and letters of guarantees. These are reported as off-balance sheet items at their notional amounts.

Financial guarantees are contracts that require the Group to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make payment when due in accordance with the terms of a debt instrument.

Financial guarantee liabilities are initially recognised at their fair value, and the initial fair value is amortised over the life of the financial guarantee. The guarantee liability is subsequently carried at the higher of this amortised amount and the present value of any expected payment (when a payment under the guarantee has become probable).

2.2.25 Offsetting

Financial assets and liabilities are offset and the net amount reported in the consolidated balance sheet when there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously.

Income and expenses are presented on a net basis only when permitted by the accounting standards, or for gains and losses arising from a group of similar transactions such as in the Group's trading activity.

2.2.26 Cash and cash equivalents

The cash and cash equivalents comprise balances with less than 90 days' original maturity including cash and balances with the central banks excluding reserve requirements and loans and advances to banks (Note 5).

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

2.2.27 Segment Reporting

Operating segments are reported in a manner consistent with the internal reporting provided to the management. All transactions between business segments are conducted on an arm´s length basis, with intra-segment revenue and costs being eliminated in head office. Income and expenses directly associated with each segment are included in determining business segment performance.

In accordance with IFRS 8, the Group has the following business segments: retail banking, wholesale banking and treasury and capital markets banking.

2.2.28 Earnings per share

Earnings per share presented in other comprehensive income are determined by dividing net profit by the weighted average number of shares outstanding during the year concerned.

	2018	2017
Profit attributable to equity holders of the Bank	93,045	369,134
Weighted average number of ordinary shares in issue	65,229,000,000	65,229,000,000
Basic and diluted earnings per share (expressed in TL per 1,000 share)	**0.001426**	**0.005659**

2.3 New and Revised International Financial Reporting Standards

a) Standards, amendments and interpretations applicable as at 31 December 2018

- **IFRS 9, ‘Financial instruments’;** effective from annual periods beginning on or after 1 January 2018. This standard replaces the guidance in IAS 39. It includes requirements on the classification and measurement of financial assets and liabilities; it also includes an expected credit losses model that replaces the current incurred loss impairment model.

- **IFRS 15, ‘Revenue from contracts with customers’;** effective from annual periods beginning on or after 1 January 2018. IFRS 15, ‘Revenue from contracts with customers’ is a converged standard from the IASB and FASB on revenue recognition. The standard will improve the financial reporting of revenue and improve comparability of the top line in financial statements globally.

- **Amendment to IFRS 15, ‘Revenue from contracts with customers’**, effective from annual period beginning on or after 1 January 2018. These amendments comprise clarifications of the guidance on identifying performance obligations, accounting for licences of intellectual property and the principal versus agent assessment (gross versus net revenue presentation). New and amended illustrative examples have been added for each of those areas of guidance. The IASB has also included additional practical expedients related to transition to the new revenue standard.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

a) Standards, amendments and interpretations applicable as at 31 December 2018

- **Amendments to IFRS 2, 'Share based payments'** on clarifying how to account for certain types of share-based payment transactions; effective from annual periods beginning on or after 1 January 2018. This amendment clarifies the measurement basis for cash-settled, share-based payments and the accounting for modifications that change an award from cash-settled to equity-settled. It also introduces an exception to the principles in IFRS 2 that will require an award to be treated as if it was wholly equity-settled, where an employer is obliged to withhold an amount for the employee's tax obligation associated with a share-based payment and pay that amount to the tax authority.

- **Annual improvements 2014-2016;** effective from annual periods beginning on or after 1 January 2018. These amendments impact 2 standards:

  - IFRS 1, 'First time adoption of IFRS', regarding the deletion of short-term exemptions for first-time adopters regarding IFRS 7, IAS 19 and IFRS 10,
  - IAS 28, 'Investments in associates and joint venture' regarding measuring an associate or joint venture at fair value.

- **IFRIC 22, 'Foreign currency transactions and advance consideration';** effective from annual periods beginning on or after 1 January 2018. This IFRIC addresses foreign currency transactions or parts of transactions where there is consideration that is denominated or priced in a foreign currency. The interpretation provides guidance for when a single payment/receipt is made as well as for situations where multiple payments/receipts are made. The guidance aims to reduce diversity in practice.

b) Standards, amendments and interpretations that are issued but not effective as at 31 December 2018:

- **Amendment to IFRS 9, 'Financial instruments';** effective from annual periods beginning on or after 1 January 2019. This amendment confirm that when a financial liability measured at amortised cost is modified without this resulting in de-recognition, a gain or loss should be recognised immediately in profit or loss. The gain or loss is calculated as the difference between the original contractual cash flows and the modified cash flows discounted at the original effective interest rate. This means that the difference cannot be spread over the remaining life of the instrument which may be a change in practice from IAS 39.

- **Amendment to IAS 28, 'Investments in associates and joint venture';** effective from annual periods beginning on or after 1 January 2019. These amendments clarify that companies account for long-term interests in associate or joint venture to which the equity method is not applied using IFRS 9.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

- **IFRS 16, 'Leases';** effective from annual periods beginning on or after 1 January 2019, with earlier application permitted if IFRS 15'Revenue from Contracts with Customers' is also applied. This standard replaces the current guidance in IAS 17 and is a farreaching change in accounting by lessees in particular. Under IAS 17, lessees were required to make a distinction between a finance lease (on balance sheet) and an operating lease (off balance sheet). IFRS 16 now requires lessees to recognise a lease liability reflecting future lease payments and a 'right of use asset' for virtually all lease contracts. The IASB has included an optional exemption for certain short-term leases and leases of low-value assets; however, this exemption can only be applied by lessees. For lessors, the accounting stays almost the same.

  However, as the IASB has updated the guidance on the definition of a lease (as well as the guidance on the combination and separation of contracts), lessors will also be affected by the new standard. Under IFRS 16, a contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

  As of 1 January 2019, Group recognized right of use asset classified under tangible assets and lease liability, amounting to TRY 111,961 due to the application of IFRS 16.

- **IFRIC 23, 'Uncertainty over income tax treatments';** effective from annual periods beginning on or after 1 January 2019. This IFRIC clarifies how the recognition and measurement requirements of IAS 12 'Income taxes', are applied where there is uncertainty over income tax treatments. The IFRS IC had clarified previously that IAS 12, not IAS 37 'Provisions, contingent liabilities and contingent assets', applies to accounting for uncertain income tax treatments. IFRIC 23 explains how to recognise and measure deferred and current income tax assets and liabilities where there is uncertainty over a tax treatment. An uncertain tax treatment is any tax treatment applied by an entity where there is uncertainty over whether that treatment will be accepted by the tax authority. For example, a decision to claim a deduction for a specific expense or not to include a specific item of income in a tax return is an uncertain tax treatment if its acceptability is uncertain under tax law. IFRIC 23 applies to all aspects of income tax accounting where there is an uncertainty regarding the treatment of an item, including taxable profit or loss, the tax bases of assets and liabilities, tax losses and credits and tax rates.

- **Annual improvements 2015-2017;** effective from annual periods beginning on or after 1 January 2019. These amendments include minor changes to:

  - IFRS 3, 'Business combinations', – a company remeasures its previously held interest in a joint operation when it obtains control of the business.
  - IFRS 11, 'Joint arrangements', – a company does not remeasure its previously held interest in a joint operation when it obtains joint control of the business.
  - IAS 12, 'Income taxes' – a company accounts for all income tax consequences of dividend payments in the same way.
  - IAS 23, 'Borrowing costs' – a company treats as part of general borrowings any borrowing originally made to develop an asset when the asset is ready for its intended use or sale.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

- **Amendments to IAS 19, 'Employee benefits' on plan amendment, curtailment or settlement';** effective from annual periods beginning on or after 1 January 2019. These amendments require an entity to:

    - use updated assumptions to determine current service cost and net interest for the reminder of the period after a plan amendment, curtailment or settlement; and
    - recognise in profit or loss as part of past service cost, or a gain or loss on settlement, any reduction in a surplus, even if that surplus was not previously recognised because of the impact of the asset ceiling.

- **Amendments to IAS 1 and IAS 8 on the definition of material;** effective from Annual periods beginning on or after 1 January 2020. These amendments to IAS 1, 'Presentation of financial statements',and IAS 8, 'Accounting policies, changes in accounting estimates and errors', and consequential amendments to other IFRSs:

    i) use a consistent definition of materiality throughout IFRSs and the Conceptual Framework for Financial Reporting;
    ii) clarify the explanation of the definition of material; and
    iii) incorporate some of the guidance in IAS 1 about immaterial information.

- **Amendments to IFRS 3 - definition of a business;** effective from Annual periods beginning on or after 1 January 2020. This amendment revises the definition of a business. According to feedback received by the IASB, application of the current guidance is commonly thought to be too complex, and it results in too many transactions qualifying as business combinations.

c) Implementation of IFRS 9

IFRS 9 replaced IAS 39 Financial Instruments: recognition and measurement, related to the classification and measurement of financial instruments.

IFRS 9 sets out the new principles for the classification and measurement of financial instruments, impairment for credit risk on financial assets and general hedge accounting.

The Bank applied the IFRS 9 requirements retrospectively by adjusting the opening balance sheet and opening equity at 1 January 2018, with no restatement of comparative periods.

Classification and measurement of financial assets

According to IFRS 9 requirements, classification and measurement of financial assets will depend on the business model within which financial assets are managed and their contractual cash flow characteristics whether the cash flows represent solely payments of principal and interest.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Assessment whether contractual cash flows are solely payments of principal and interest

For the purposes of this assessment, “Principal” is defined as the fair value of the financial asset on initial recognition. “Interest” is defined as consideration for the time value of money, for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs (e.g. liquidity risk and administrative costs), as well as a profit margin.

In assessing whether the contractual cash flows are solely payments of principal and interest, the Group will consider the contractual terms of the instrument. This will include assessing whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition. In making the assessment, the Group consider:

- Contingent events that would change the amount and timing of cash flows;
- Leverage features;
- Prepayment and extension terms
- Features that modify consideration for the time value of money

The Group fulfills the on-balance sheet classification and measurement criteria by applying the procedures described above for all financial assets.

Upon initial recognition each financial asset will be classified as either fair value through profit or loss (“FVPL”), amortized cost or fair value through other comprehensive income (“FVOCI”). As the requirements under IFRS 9 are different than the assessments under the existing IAS 39 rules, the classification and measurement of financial liabilities remain largely unchanged under IAS 39.

Impairment of financial assets

The Group recognizes a loss allowance for expected credit losses on financial assets measured in amortized cost and financial assets at fair value through other comprehensive income.

These financial assets are divided into three categories below depending on the 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, a lifetime expected credit loss is recorded.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Calculation of expected credit losses

The calculation of expected credit losses consists of three main parameters: probability of default (PD), loss given default (LGD) and exposure at default (EAD). PDs and LGDs used in the ECL calculation are point in time ("PIT")-based for key portfolios and consider both current conditions and expected cyclical changes.

While the expected credit loss is estimated, three scenarios (baseline scenario, adverse scenario, optimistic scenario) are evaluated. Each of these scenarios was associated with the different PD and LGD.

In addition, a certain portion of commercial and corporate loans is assessed individually in accordance with the internal policies in the calculation of the expected credit losses based on IFRS 9. Such calculations are made by discounting the expected cash flows from the individual financial instrument to its present value using the effective interest rate.

When measuring expected credit losses, it shall be considered the risk or probability that a credit loss occurs by reflecting the possibility that a credit loss occurs and the possibility that no credit loss occurs, even if the possibility of a credit loss occurring is very low. Such assessment is made by reflecting the estimate of expected credit losses which is unbiased and probability-weighted determined by evaluating a range of possible outcomes.

Probability of Default (PD)

The PD represents the likelihood of a default over a specified time period. A 12-month PD represents the likelihood of default determined for the next 12 months and a lifetime PD represents the probability of default over the remaining lifetime of the instrument. The lifetime PD calculation is based on a series of 12-month PIT PDs. In modeling, factors such as segment information, systematic and non-systematic information are taken into consideration. It is used internal rating systems for commercial portfolio to measure risk level. The internal rating models used for the commercial portfolio include customer financial information and qualitative survey responses. Whereas behavioral and application scorecards used in the retail portfolio include; the behavioral data of the customer and the product in the Parent Bank, the demographic information of the customer, and the behavioral data of the customer in the sector. In the retail portfolio, a structure was constructed on the segment based structure and the distribution of the customers among the predetermined segments. Segments are formed by product-specific variables and product based. Probability of default calculation has been carried out based on past information, current conditions and forward looking macroeconomic parameters.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Loss Given Default (LGD)

The LGD represents an estimate of the loss at the time of a potential default occurring during the life of a financial instrument. The LGD is calculated taking into account expected future cash flows from collateral and other credit enhancements by considering time value of money.

LGD calculations are performed using historical data which best reflects current conditions, by formation of segments based on certain risk factors that are deemed important for each portfolio and inclusion of forward-looking information and macroeconomic expectations. LGD summarizes all cash flows from customers subsequent to default. It covers all costs and collections that occur during the collection cycle, including collections from collaterals. It also includes the "time value of money" calculated by means of deducting costs and additional losses from the present value of collections. The Parent Bank bases its estimates on models for collateralized portfolios and on previous experience for unsecured parties, except for corporate loans that are assigned by the Basel Committee individually or as designated by the Basel Committee.

Exposure at Default (EAD):

The EAD represents an estimate of the exposure to credit risk at the time of a potential default occurring during the life of a financial instrument. It represents the cash flows outstanding at the time of default, considering expected repayments, interest payments and accruals, discounted at the effective interest rate. Future drawdowns on facilities are considered through a credit conversion factor (CCF) that is reflective of historical drawdown and default patterns and the characteristics of the respective portfolios. While the expected credit loss is estimated, three scenarios (baseline scenario, bad scenario, optimistic scenario) are evaluated. Each of these scenarios was associated with the probability of different default and loss in default.

Consideration of the Macroeconomic Factors

Probability of default parameters are determined by considering macroeconomic factors. The macroeconomic variables used in the calculation of the expected loss are as follows:

- Annual percentage change of GDP in USD
- Annual percentage change in revenue growth rate
- Annual change in export amount
- Annual percentage change in USD/TRY

Stages were determined through the models created using internal information for the Parent Bank simplified method has been applied for other financial institutions.

Calculating the Expected Loss Period

Lifetime ECL is calculated by taking into account maturity extensions, repayment options and the period during which the Parent Bank will be exposed to credit risk. The time in financial guarantees and other irrevocable commitments represents the credit maturity for which the liabilities of the Parent Bank. Behavioral maturity analysis has been performed on credit cards and overdraft accounts. With the exception of credit cards and other revolving facilities, the maximum period for which the credit losses are determined is the contractual life of a financial instrument unless there is the legal right to call it earlier. However due to segment-based approach to retail loans the maturity of the 95 percentile is calculated as the credit life.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Significant increase in credit risk

Group makes qualitative and quantitative assessments regarding assessment of significant increase in credit risk of financial assets to be classified as stage 2 (Significant Increase in Credit Risk).

Within the scope of quantitative assessment, the quantitative reason explaining the significant increase in the credit risk is based on a comparison of the probability of default calculated at the origination of the loan and the probability of default assigned for the same loan as of the reporting date. If there is a significant deterioration in PD, it is considered that there is a significant increase in credit risk and the financial asset is classified as stage 2. In this context, Group has calculated thresholds at which point the relative change is a significant deterioration. In the quantitative evaluation of the significant increase in credit risk, the Parent Bank considers the absolute thresholds as well as the relative thresholds as an additional layer. Receivables below the absolute threshold value of default are not included in the relative threshold value comparison.

Group classifies the financial asset as Stage 2 (Significant Increase in Credit Risk) where any of the following conditions are satisfied as a result of a qualitative assessment:

- Loans overdue more than 30 days as of the reporting date
- Loans classified as watch-list
- When there is a change in the payment plan
- Receivables with a negative probability above the predetermined threshold values between the probability of default at the date of release and the probability of default at the reporting date.

Explanation on IFRS 9 Financial Instruments

As of 1 January 2018, the Group recognizes a loss allowance for expected credit losses on financial assets measured at amortized cost, financial assets measured at fair value through other comprehensive income, loan commitments and non-cash loans based on IFRS 9 effective from 1 January 2018.

IFRS 9 sets out the new principles for the classification and measurement of financial instruments, expected credit loss which will be calculated for financial assets and hedge accounting.

In accordance with the transition rules option provided by the IFRS 9 "Financial Instruments", the Group is not restated the prior period financial statements and recognized the transition effect of the standard as of January 1, 2018 under equity’s “prior year profit or loss” accounts then the Bank reclassified this effect to extraordinary reserves.

The Group applies the above-mentioned procedures for all financial assets to the balance sheet classification and measurement criteria.

Each financial assets classified as financial asset at fair value through profit or loss, at amortized cost, or at fair value through profit or loss at initial recognition. For the classification and measurement of financial liabilities, the application of the existing provisions in IAS 39 does not change much.

Explanations on the impact of IFRS 9 implementation of Group is stated below.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Reconciliation of statement of financial position balances as at the transition of IFRS 9

The following table shows the reconciliation of provision of impairment loss as of 31 December 2017 and the new expected credit loss in accordance with IFRS 9 as of 1 January 2019.

	Book value before IFRS 9 31 December 2017	Remeasurements	Book value after IFRS 9 1 January 2018
Loans	**846,191**	**325,662**	**1,171,853**
Stage1 & Stage 2	236,213	281,368	517,581
Stage3	609,978	44,294	654,272
Banks and Sovereings	**1**	**942**	**943**
Other Assets	**-**	**757**	**757**
Debt Securities - FVOCI	**-**	**314**	**314**
Financial Assets	**846,192**	**327,675**	**1,173,867**
Non-Cash Loans	**10,389**	**7,996**	**18,385**
Stage1 & Stage 2	1,095	7,992	9,087
Stage 3	9,294	4	9,298
Total	**856,581**	**335,671**	**1,192,252**

(*)The Consolidated Subsidiaries' transition to IFRS 9 does not have a significant impact on the opening balance.

	Before IFRS 9		In scope of IFRS 9
Measurement Bases	**Book Value**	**Measurement Bases**	**Book Value**
	31 December 2017		**1 January 2018**
Fair Value Through Profit or Loss	278,421	Fair Value Through Profit or Loss	292,862
Available for Sale	1,363,506	Fair Value Through Other Comprehensive Income	1,349,065

The adoption of IFRS 9 has resulted in changes in the accounting policies for recognition, classification and measurement of financial assets and liabilities. In accordance with the previous implementation, a portion of securities, which are represented in reserves previously listed under “Available for Sale Financial Assets”, is now listed under “Financial Assets at Fair Value through Profit or Loss”. In transition date, income of TL 5,846 after tax regarding book values of related securities are accounted in the opening balance sheet under “Retained Earnings”.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Effects on equity with IFRS 9 transition

Amounting to TL 335,671 difference which is an expense between the provision for impairment of the previous period of the Group and the provision for loss that is measured in accordance with IFRS 9 impairment model as of 1 January 2018 is classified as "Retained Earnings" in shareholders' equity.

2.4 Statement of Cash Flows

The cash and cash equivalents balance comprises cash and balances with central banks (excluding restricted reserve deposits), deposits with banks and other financial institutions and other money market placements with an original maturity of three months or less.

Changes in cash and cash equivalents related to operating activities reflect cash flows generated by the Group’s operations.

Changes in cash and cash equivalents related to investing activities reflect cash flows resulting from acquisitions and disposals of subsidiaries, as well as acquisitions and disposals of premises and equipment.

Changes in cash and cash equivalents related to financing activities reflect the cash inflows and outflows resulting from transactions with shareholders and cash flows related to subordinated debt.

NOTE 3 - CRITICAL ACCOUNTING ESTIMATES AND JUDGEMENTS IN APPLYING ACCOUNTING POLICIES

The preparation of financial statements requires management to make judgments, estimates and assumptions that affect the application of accounting policies and the reported amount of assets and liabilities, income and expense.

Estimates and judgements are continually evaluated and are based on management's experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. Actual results may differ from these estimates. Judgements, which have the most significant impact on the amounts recognised in the consolidated financial statements and estimates which can cause a significant adjustment to the carrying amount of assets and liabilities include:

Impairment losses on loans and advances: Assets measured at amortized cost are evaluated for impairment as per the explanations disclosed in section "2.3.c) Implementation of IFRS 9".

Fair value of derivatives: Where valuation techniques are used to determine fair values, they are validated and periodically reviewed. Changes in assumptions about these factors could affect the reported fair values.

Restructuring provision: The Bank recognized restructuring provision on its 31 December 2018 financial statements for the whole liability to be incurred as part of the strategic actions in the scope of restructuring process. The restructuring staff costs has been recognized as per the business plan estimations based on the number of employees and the average compensation figures. Other costs rather than staff includes fixed assets and litigation provision.

The Group, as a general principle does not carry any significant foreign currency position, by hedging its foreign currency positions with derivative products.

NOTE 4 - FINANCIAL RISK MANAGEMENT

This section provides details of the Group exposure to risk and describes the methods used by management to control risk. The Bank and its affiliates' have exposure to the following risks from its use of financial instruments:

a) credit risk
b) liquidity risk
c) market risks
d) operational risks

The nature of the risks and the approach to managing risk differs fundamentally between the trading and non-trading portfolios; section 4.2 contains risk management information related to the trading portfolio.

Risk management framework

The Bank risk management framework was established according to the Turkish Banking Law and Regulation on Internal Systems of Banks and Internal Capital Adequacy Assessment Process. An independent Risk Management Unit ("RMU") reports to the Audit Committee and functioning according to the risk policies and strategies set by the Board.

The Bank gives utmost attention to the risks associated with products and employs contemporary risk management systems and techniques. An integrated risk management and control functions have been established during the course of growth in operations in Turkey.

Market risk objective is to manage and control market risk exposures while maintaining a market profile consistent with our risk appetite. Therefore a range of tools are used to monitor and limit market risk exposures including sensitivity analysis, VaR and stress testing. HSBC Bank A.Ş. strategy is to reduce exposure to these risks and minimise volatility in capital resources, cash flows and distributable reserves."

Well-established loan administration and monitoring facilities are employed in daily business. The Bank applies Customer Risk Rating ("CRR") system for corporate customers and scorecard for retail customers in order to measure credit risk and provision is allocated through IFRS 9 models.

Regular scenario analysis and stress tests are carried out in order to estimate the possible deterioration in capital adequacy and to determine the liquidity level under adverse market conditions. Contingency plans and policies are kept updated accordingly.

The Bank established Operational Risk monitoring and reporting procedures and integrated into all the functions in the Bank. Close monitoring of operational loss events and Key Risk Indicators is undertaken by the RMU and first line of defence and reported to top management as well as the Audit Committee. A Basel compliant operational risk database has been constructed and is updated continuously.

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

Robust and dynamic limiting mechanisms based on the best industry practices and independent limit following units have been put in place for the optimal risk management.

The RMU coordinates the enterprise wide risk management activities in the Bank and implements the Basel framework for better risk management. Bank Risk Committee and Asset & Liability Committees have been formed in order to bring together the risk and business teams. These Committees meet regularly and takes necessary actions. These Committees and the Audit Committee have also sustained the coordination between the RMU, Internal Control Unit and Internal Audit.

The Audit Committee consists of two non-executive directors, including the Chair, which complies with local regulations. The Committee has a further non-executive director in attendance as an observer and the Board member responsible for internal systems (i.e. INA, RC, RM and ICU). The Audit Committee, which was established to assist the Board of Directors in its auditing and supervising activities, is responsible for:

a) The supervision of the efficiency and effectiveness of the internal control, risk management and internal audit systems of the Bank, functioning of these systems as well as accounting and reporting systems within the framework of related procedures, and the integrity of information generated;
b) The preliminary assessment on the selection process of independent audit firms and the systematic monitoring of the activities of these companies;
c) The maintenance and coordination of the internal audit functions of corporations subject to consolidated internal audits.

4.1 Derivative financial instruments

The Group enters into a variety of derivative financial instruments for hedging and risk management purposes. This note describes the derivatives used. Details of the nature and terms of derivative instruments outstanding at the balance sheet dates are set out in Note 9. Derivative financial instruments used include swaps, futures, forwards, options and other similar types of contracts whose value changes in response to changes in interest rates, foreign exchange rates and gold prices. Except futures, derivatives are individually negotiated over-the-counter contracts. A description of the main types of derivative instruments used is set out below:

Swaps

Swaps are over-the-counter agreements to exchange future cash flows based upon agreed notional amounts. Most commonly used swaps are currency swaps. The Group is subject to credit risk arising from the respective counterparties' failure to perform. Market risk arises from the possibility of unfavourable movements in market rates relative to the contractual rates of the contract.

Futures and forwards

Futures and forward contracts are commitments to either purchase or sell a designated financial instrument, currency, commodity or an index at a specified future date for a specified price and may be settled in cash or another financial asset. Futures are standardized exchange-traded contracts whereas forwards are individually traded over-the-counter contracts. Initial margin requirements for futures are met in cash or other instruments, and changes in the future contract values are settled daily. Therefore credit risk is limited to the net positive change in the market value for a single day. Futures contracts have limited credit risk because the counterparties are futures exchanges. Forward contracts result in credit exposure to the counterparty. Futures and forward contracts both result in exposure to market risk based on changes in market prices relative to contracted amounts.

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

Options

Options are derivative financial instruments that give the buyer, in exchange for a premium payment, the right, but not the obligation, to either purchase from (call option) or sell (put option) to the writer a specified underlying at a specified price on or before a specified date. The Group enters into foreign exchange and interest rate options. Foreign currency options provide protection against rising or falling currency rates. The Group as a buyer of over-the-counter options is subject to market risk and credit risk since the counterparty is obliged to make payments under the terms of the contract if the Group exercises the option. As the writer of over-the-counter options, the Group is subject to market risk and liquidity risk only since it is obliged to make payments if the option is exercised. Options are mainly traded for clients' needs.

4.2 Trading activities

The Group maintains active trading positions in non-derivative financial instruments. Most of the trading activities are customer driven. In anticipation of customer demand, an inventory of capital market instruments is carried and access to market liquidity is maintained by quoting bid and offer prices to and trading with other market makers.

Positions are also taken in the interest rate, foreign exchange, debt and equity markets based on expectations of future market conditions. These activities constitute the proprietary trading business and enable the Group to provide customers with capital market products at competitive prices. As trading strategies depend on both market-making and proprietary positions, given the relationships between instruments and markets, those are managed in concert to maximize net trading income. Trading activities are managed by type of risk involved and on the basis of the categories of trading instruments held.

Counterparty credit risk

The Group's counterparty credit exposure at balance sheet date from financial instruments held or issued for trading purposes is represented by the fair value of instruments with a positive fair value at that date, as recorded on the balance sheet. Notional amounts disclosed in the notes to the consolidated financial statements do not represent the amounts to be exchanged by the parties to derivatives and do not measure the exposure to credit or market risks. The amounts to be exchanged are based on the terms of the derivatives.

Market risk

Market risk is defined as the risk of the decrease in value of the trading portfolio due to shifts in interest rate, currency, stock market, and commodity and option prices. To measure possible losses internally, in addition to taking into consideration the calculations made by the standard method in statutory reportings, the Parent Bank uses Value-at-Risk (VaR), Value at Risk under Stress (VaRS) and Additional Risk Capital Requirement (ARCR) models. The difference between the risk pointed by the internal models and the standard method is taken into account in the calculation of economic capital.

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

The Parent Bank monitors market risk through daily currency option limits, maximum loss limits, portfolio size limits and sensitivity to interest (Present Value Basis Points - PVBP in the breakdown of portfolio, maturity and currency), in addition to VaR limits that are separately applied on the basis of portfolio and risk factor (interest, currency risk). Risk monitoring and control activities are carried out by independent units.

VaR is calculated by the historical simulation method by calibrating over the daily profit/loss data of the last two years, and scenarios are updated every two weeks. VaR is calculated on the basis of one-way confidence interval of 99% and a daily holding period, in summary, indicates the observed worst 5th loss number eventually re-calculated according to portfolio’s last 500 daily market changes regarding the subjected day. Backtesting is also performed daily to test the accuracy of the estimates VaR method consists.

The value subject to risk under stress, is calculated weekly for 1 year stress period within 99% trust interval on the basis of a holding period of 10 days. In this context, the portfolio’s stress RMD within 250 days stress period regarding the subjected day, indicates the worst 2nd and 3rd loss numbers average observed as a result of re-calculated according to daily market changes. For the general of HSBC Group the stress period is calibrated once every 3 months taking the worst market conditions into consideration and in addition taking different risk profiles into consideration; countrywide stress period evaluations and impact analysis are being done and reported from 1 January 2007 to date.

Additional Risk Capital Requirement represents the loss that can occur due to the possibility of a decrease in the credit worthiness of issuers of securities in the trading portfolio. In addition to VaR and PVBP restrictions, Stress Tests are also being used to measure the potential effects of possible but extreme situations in various financial factors or market movements on the value of the portfolio. Stress Test results are assessed by the Senior Management in order to determine the effects of such incidents on the financials and to take necessary precautions to narrow down possible losses.

Market risk limits are evaluated by related senior management including the Risk Management Unit Manager, Market and Counterparty Risk Unit Manager, and Chief Executive of the Bank. Limits are reviewed at least once a year by the Risk Management Committee and presented to the Audit Committee and Board of Directors for approval. Risk Management Committee can set a sublimit and can change the limits, with the main limits set by the Board of Directors remaining fixed.

Market risk limits and actualizations are tracked daily by management and business lines, are presented weekly to the Board of Directors, monthly to ALCO, Risk Management Committee and Audit Committee.

The limit usages are being monitored through various checkpoints that are the rate of change in the price of main components of market risk (currency risk and interest rate risk), volatility, Price Value Basis Point (“PVBP”) and market liquidity risk. Stress scenarios, liquidity, gap, and volatility analysis have been performed consistently. The purposes of these analyses are to be prepared for the possible risks and to make quick decisions regarding the targeted profitability.

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

Market opportunities have been observed invariably for risk-reducing positions, procedures which provide protection against the risk and insurance transactions if appropriate. Currency and Total Liquidity Ratio, VaR and PVBP limits and excesses in limits, the internal capital requirement and stress test results have been reported to the top executive and Market Risk Committee as monthly.

A. Liquidity risk

The objective of liquidity and funding management is to ensure that liquidity resources are adequate, both as to the amount and quality, to ensure that there is no significant risk that liabilities cannot be met as they fall due, to ensure that a prudent structural funding profile is maintained and illiquid assets (loans) are always funded by core funding sources where core funding sources consist of core deposits and long-term non-deposit debt instruments.

Provided that clauses of Local Regulation on the Measurement and Assessment of Liquidity Adequacy of Banks and Liquidity Coverage Ratio are reserved, Bank also manages the liquidity and funding risk in accordance with the Group Liquidity and Funding internal risk management framework where liquidity risk and funding risk tolerance and risk appetites are approved by Local ALCO.

Within the internal risk framework, Bank has several key components while managing the liquidity and funding risk, as given below:

- Liquidity Adequacy
- Funding Profile monitoring
- Depositor Concentration monitoring
- Term Funding Maturity Concentration monitoring
- Liquidity Funds Transfer Pricing
- Liquidity Triggers and tactical actions plans
- Contingency Funding Plan
- Balance sheet projections and Strategic Funding Plan through detailed assessment of forward looking funding requirements.

Bank utilises Liquidity Coverage Ratio (both under local and international regulations) and Net Stable Funding Ratio as the main measures of Liquidity Adequacy and Funding Profile, respectively. Additionally, bank monitors and reports deposit concentration and term funding maturity concentration to ALCO at least monthly.

Bank assesses forward looking funding requirements based on the balance sheet projections and the main tool that Bank utilises is the Strategic Funding Plan approved by ALCO in order to ensure that liquidity resources are adequate, both as to the amount and quality, to ensure that there is no significant risk that liabilities cannot be met as they fall due, and to ensure that a prudent structural funding profile is maintained.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

Bank also considers several Liquidity Triggers and Contingency Funding Plan which approved by ALCO and Board besides ordinary work flow in liquidity and funding management. Liquidity Triggers and Contingency Funding Plan sets out practical actions to manage through stress scenarios and remediation actions, once the stress has stabilised, to revert the entity back to a position within its risk appetite. Any incident that triggers any early warning indicator pre-established within the Liquidity Triggers and Contingency Plan are immediately communicated to ALCO and necessary actions are taken to remediate.

Table below represents lowest, highest and average consolidated liquidity coverage rates by taking their simple averages for the last three-month period of 2018.

	Current Period - 31.12.2018	
	TL+FC	**FC**
Highest (%)	529.57	537.49
Date	28.12.2018	28.12.2018
Lowest (%)	253.22	227.95
Date	04.10.2018	04.10.2018
Average (%)	309.37	324.74

Table below represents lowest, highest and average consolidated liquidity coverage rates by taking their simple averages for the last three-month period of 2017.

	Prior Period - 31.12.2017	
	TL+FC	**FC**
Highest (%)	471.12	299.73
Date	31.10.2017	17.11.2017
Lowest (%)	212.54	90.40
Date	12.10.2017	11.10.2017
Average (%)	373.85	188.76

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

The following table presents the cash flows payable by the Group under non-derivative financial liabilities remaining contractual maturities at the balance sheet date. The amounts disclosed in the table are the contractual undiscounted cash flows, whereas the Group manages the inherent liquidity risk based on expected undiscounted cash inflows.

31 December 2018	Demand and up to 1 month	1-3 months	3-12 months	1-5 years	Over 5 years	Total
Deposits from banks	1,880,815	-	-	-	-	1,880,815
Deposits from customers	19,161,202	3,226,383	727,607	9,957	-	23,125,149
Other borrowed funds	37,960	622,355	729,027	-	2,140,057	3,529,399
Total liabilities	**21,079,977**	**3,848,738**	**1,456,634**	**9,957**	**2,140,057**	**28,535,363**

31 December 2017	Demand and up to 1 month	1-3 months	3-12 months	1-5 years	Over 5 years	Total
Deposits from banks	1,542,952	-	-	-	-	1,542,952
Deposits from customers	13,460,964	1,284,161	161,704	48	-	14,906,877
Other borrowed funds	80,013	285,462	200,123	2,188,835	1,563,603	4,318,036
Total liabilities	**15,083,929**	**1,569,623**	**361,827**	**2,188,883**	**1,563,603**	**20,767,865**

The following table represents the notional amounts of the outstanding derivative cash flows of the Group on contractual maturity basis:

Derivatives settled on a gross basis

31 December 2018	Up to 1 month	1-3 months	3-12 months	1-5 years	Over 5 years	Total
Derivatives held for trading:						
Foreign exchange derivatives:						
- Inflow	12,959,134	3,348,171	8,147,025	3,799,751	-	28,254,081
- Outflow	12,905,870	3,348,586	8,080,192	3,813,181	-	28,147,829
Interest rate derivatives:						
- Inflow	-	201	3,181	46,814	29,313	79,509
- Outflow	-	181	3,292	55,827	19,858	79,158
Total inflow	**12,959,134**	**3,348,372**	**8,150,206**	**3,846,565**	**29,313**	**28,333,590**
Total outflow	**12,905,870**	**3,348,767**	**8,083,484**	**3,869,008**	**19,858**	**28,226,987**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

31 December 2017	Up to 1 month	1-3 months	3-12 months	1-5 years	Over 5 years	Total
Derivatives held for trading:						
Foreign exchange derivatives:						
- Inflow	19,780,620	6,597,671	5,655,714	4,493,180	-	36,527,185
- Outflow	19,774,450	6,817,835	5,643,082	4,484,962	-	36,720,329
Interest rate derivatives:						
- Inflow	-	320	368	41,942	27,974	70,604
- Outflow	-	287	350	35,317	16,880	52,834
Total inflow	**19,780,620**	**6,597,991**	**5,656,082**	**4,535,122**	**27,974**	**36,597,789**
Total outflow	**19,774,450**	**6,818,122**	**5,643,432**	**4,520,279**	**16,880**	**36,773,163**

B. Hedging

The gains and losses on ineffective portions of such derivatives are recognised immediately in ‘Net trading income’. For the year ended 31 December 2018, there are TL 3,354 gains on ineffective portions recognised due to hedge ineffectiveness (2017: TL 3,914 gain).

At 31 December 2018, the Group has no hedging instruments.

C. Market risk

As a commercial Group, the focus is serving the financial needs of the customers, thereby generating exposure to interest rate and foreign exchange risk.

I. Interest rate risk

The Group’s operations are subject to the risk of interest rate fluctuations to the extent that interest-earning assets (including investments) and interest-bearing liabilities mature or reprice at different times or in differing amounts. In the case of floating rate assets and liabilities, the Group is also exposed to basis risk, which is the difference in repricing characteristics of the various floating rate indices, such as the deposit rate and monthly libor and different types of interest. Treasury activities are aimed at optimizing net interest income, given market interest rate levels consistent with the Group’s business strategies.

Asset-liability risk management activities are conducted in the context of the Bank’s sensitivity to interest rate changes. In general, as common in current economic environment, the consolidated financial statements are liability sensitive because its interest-earning assets have a longer duration and reprice slightly less frequently than interest-bearing liabilities. This means that in rising interest rate environments, margins earned will narrow as liabilities reprice. However, the actual effect will depend on a number of factors, including the extent to which repayments are made earlier or later than the contracted dates and variations in interest rate sensitivity within repricing periods and among currencies. Interest rate derivatives are primarily used to bridge the mismatch in the repricing of assets and liabilities. This is done in accordance with the guidelines established by the Bank’s asset-liability management committee (“ALCO”).

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

Part of the Bank's return on financial instruments is obtained from controlled mismatching of the dates on which interest receivable on assets and interest payable on liabilities are next reset to market rates or, if earlier, the dates on which the instruments mature.

The table below summarises weighted average interest rates for financial instruments by major currencies outstanding at 31 December 2018 and 2017 based on yearly contractual rates.

	31 December 2018			31 December 2017		
	USD (%)	**EUR (%)**	**TL (%)**	**USD (%)**	**EUR (%)**	**TL (%)**
Assets						
Cash and balances with the Central Bank	2.00	-	13.00	-	-	12.75
Loans and advances to banks	4.07	0.97	22.90	1.44	-	12.92
Financial assets at fair value through profit or loss	6.10	6.84	11.91	6.65	4.48	6.14
Financial assets measured at fair value through OCI	-	-	11.01	-	-	8.44
Loans and advances to customers	5.65	4.3	21.72	4.61	3.78	12.39
Liabilities						
Deposits from banks	2.5	-	19.60	1.50	-	8.10
Deposits from customers	3.65	2.04	22.18	2.49	1.41	11.31
Other borrowed funds	6.72	-	21.29	4.58	-	14.01

The balance sheet management is performed by the Assets and Liabilities Management Department in line with the main strategies determined by ALCO.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

The table below summarises the Group's exposure to interest rate risk at 31 December 2018 and 2017. Included in the table are the Group's financial assets and liabilities in carrying amounts classified in terms of periods remaining to contractual repricing dates.

31 December 2018	Up to 3 months	3 months to 1 year	1 year to 5 years	Over 5 years	Non-interest bearing	Total
Cash balances and restricted deposits with Central Bank	3,534,216	-	-	-	2,531,239	6,065,455
Loans and advances to banks	8,430,080	-	-	-	40,370	8,470,450
Financial assets at fair value through profit or loss						
- Trading securities	231	14,312	5,402	7,068	-	27,013
- Trading derivative	415,944	458,950	126,233	-	-	1,001,127
- Equity Instruments	-	-	-	-	20,223	20,223
Loans and advances to customers	7,437,545	2,329,546	4,185,190	632,308	236,413	14,821,002
Financial assets measured at fair value through OCI	-	-	456,176	54,953	-	511,129
Other assets	1,986	72	163,489	-	990,564	1,156,111
Total assets	**19,820,002**	**2,802,880**	**4,936,490**	**694,329**	**3,818,809**	**32,072,510**
Deposits from banks	1,744,608	-	-	-	131,900	1,876,508
Deposits from customers	18,900,023	659,061	8,126	-	3,410,230	22,977,440
Other borrowed funds	2,152,682	592,944	-	-	37,960	2,783,586
Trading derivative liabilities	354,316	434,491	152,287	-	-	941,094
Other liabilities	181,226	186,774	296,042	-	2,829,840	3,493,882
Total liabilities	**23,332,855**	**1,873,270**	**456,455**	**-**	**6,409,930**	**32,072,510**
Net interest repricing gap	**(3,512,853)**	**929,610**	**4,480,035**	**694,329**	**(2,591,121)**	**-**
Off balance sheet derivative instruments net notional position	29,827	66,833	(13,430)	-	-	83,230

31 December 2017	Up to 3 months	3 months to 1 year	1 year to 5 years	Over 5 years	Non-interest bearing	Total
Cash balances and restricted deposits with Central Bank	2,770,612	-	-	-	1,132,843	3,903,455
Loans and advances to banks	2,150,372	-	-	-	15,820	2,166,192
Financial assets at fair value through profit or loss						-
- Trading securities	142,521	29,757	87,114	13,609	5,420	278,421
- Trading derivative	288,182	214,408	176,793	1,146	-	680,529
Loans and advances to customers	8,487,298	2,442,178	3,635,034	773,513	20,129	15,358,152
Available-for-sale investment securities	605,364	262,257	414,529	66,915	14,441	1,363,506
Other assets	9,195	15	215,845	-	470,138	695,193
Total assets	**14,453,544**	**2,948,615**	**4,529,315**	**855,183**	**1,658,791**	**24,445,448**
Deposits from banks	1,451,801	-	-	-	57,602	1,509,403
Deposits from customers	12,048,687	158,725	47	-	2,631,370	14,838,829
Other borrowed funds	2,806,144	211,122	607,498	-	80,013	3,704,777
Trading derivative liabilities	343,559	222,611	173,690	-		739,860
Other liabilities	258,155	3,873	492,277	-	2,898,274	3,652,579
Total liabilities	**16,908,346**	**596,331**	**1,273,512**	**-**	**5,667,259**	**24,445,448**
Net interest repricing gap	**(2,454,802)**	**2,352,284**	**3,255,803**	**855,183**	**(4,008,468)**	**-**
Off balance sheet derivative instruments net notional position	(144,196)	34,049	(3,673)	-	-	(113,820)

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

The interest rate risk is monitored with methods such as static duration gap and sensitivity analysis based on all interest rate sensitive assets and liabilities. The scenarios include 200 to 500 basis points parallel fall or rise in all yield curves. In the analysis presented below, the sensitivity of the statement of comprehensive income is the effect of possible changes in the interest rates on the net interest income of floating rate financial assets and liabilities at 31 December 2018. The sensitivity of the shareholders' equity at 31 December 2018 is calculated through revaluating the financial assets measured at fair value through OCI taking into account the possible changes in interest rates. The tax effects are not considered in the analysis. Analysis is based on the unconsolidated amounts. The other variables, especially exchanges rates, are assumed to be fixed in this analysis. The same method is applied for 31 December 2018.

2018 - Type of Currency	Shocks Applied (+/- basis points)	Gains/Losses	Gains/Equity-Losses/Equity
1.TL	500	(140,828)	(3.15)%
2.TL	(400)	134,464	3.01%
3.EURO	200	(118,102)	(2.64)%
4.EURO	(200)	13,876	0.31%
3.USD	200	228,618	5.12%
6.USD	(200)	(265,950)	(5.96)%
Total (of negative shocks)		**(117,610)**	**(2.63)%**
Total (of positive shocks)		**(30,312)**	**(0.65)%**

2017 - Type of Currency	Shocks Applied (+/- basis points)	Gains/Losses	Gains/Equity-Losses/Equity
1.TL	500	(204,332)	(5.71)%
2.TL	(400)	198,240	5.54%
3.EURO	200	(61,719)	(1.72)%
4.EURO	(200)	10,642	0.30%
3.USD	200	(12,644)	(0.35)%
6.USD	(200)	18,240	0.51%
Total (of negative shocks)		**227,122**	**6.34%**
Total (of positive shocks)		**(278,695)**	**(7.78)%**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

II. Currency risk

Foreign exchange exposure is the result of the mismatch of foreign currency denominated assets and liabilities (including foreign currency indexed ones) together with exposures resulting from off-balance sheet foreign exchange derivative instruments. The Group evaluates the exposure for the effects of fluctuations in the prevailing foreign currency exchange rates on its financial position and cash flows.

31 December 2018	**USD**	**EUR**	**Other**	**Total**
Cash and cash equivalents	1,128,564	1,206,199	74,607	2,409,370
Restricted balances with Central Bank	437,555	511,744	365,888	1,315,187
Loans and advances to banks	8,053,533	23,415	9,737	8,086,685
Financial assets at fair value through profit or loss				
- *Trading securities*	9,408	874	-	10,282
- *Trading derivative*	486,377	483,030	1,537	970,944
- *Equity Instruments*	-	14,656	-	14,656
Loans and advances to customers	2,572,133	3,398,010	15,293	5,985,436
Hedging derivatives	-	-	-	-
Financial assets measured at fair value through OCI	-	-	-	-
Other assets	261,005	252,738	65	513,808
Total assets	**12,948,575**	**5,890,666**	**467,127**	**19,306,368**
Deposits from banks (*)	1,698,556	-	-	1,698,556
Deposits from customers	8,632,216	5,735,909	1,278,196	15,646,321
Other borrowed funds	1,553,049	30,496	-	1,583,545
Derivative financial instruments	554,243	325,026	35,904	915,173
Other liabilities	199,056	3,634	78	202,768
Total liabilities	**12,637,121**	**6,095,065**	**1,314,178**	**20,046,364**
Net balance sheet position	**311,454**	**(204,399)**	**(847,051)**	**(739,996)**
Off balance sheet derivative instruments net notional position (*)	(229,759)	316,303	828,988	915,532
Net foreign currency position	**81,695**	**111,904**	**(18,063)**	**175,536**

(*) "Transactions Related to Foreign Currency Deposits in Turkish Lira Deposits" are recorded in the off-balance sheet as a derivative transaction.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

31 December 2017	USD	EUR	Other	Total
Cash and cash equivalents	208,837	32,960	67,053	308,850
Restricted balances with Central Bank	743,125	276,903	264,418	1,284,446
Loans and advances to banks	1,926,096	98,685	9,121	2,033,902
Financial assets at fair value through profit or loss				
- *Trading securities*	22,084	2,467	-	24,551
- *Trading derivative*	121,846	178,125	13,302	313,273
Loans and advances to customers	2,450,289	2,886,801	15,957	5,353,047
Hedging derivatives	-	-	-	-
Available for sale investment securities	-	2,435	-	2,435
Other assets	4,916	4,547	21,556	31,019
Total assets	**5,477,193**	**3,482,923**	**391,407**	**9,351,523**
Deposits from banks	10	-	-	10
Deposits from customers	5,382,578	2,707,336	1,050,298	9,140,212
Other borrowed funds	3,643,718	465,827	2,787	4,112,332
Derivative financial instruments	378,337	260,742	3,593	642,672
Other liabilities	10,589	5,928	9,290	25,807
Total liabilities	**9,415,232**	**3,439,833**	**1,065,968**	**13,921,033**
Net balance sheet position	**(3,938,039)**	**43,090**	**(674,561)**	**(4,569,510)**
Off balance sheet derivative instruments net notional position	5,140,225	(768,674)	518,541	4,890,092
Net foreign currency position	**1,202,186**	**(725,584)**	**(156,020)**	**320,582**

Foreign currency translation rates used by the Group as of respective year-ends are as follows:

	EUR / TL	USD / TL
31 December 2016	3.7161	3.5263
31 December 2017	4.5332	3.7816
31 December 2018	6.0566	5.2885

For the purpose of calculating currency risks, foreign currency indexed loans and securities have been reported in this table in the relevant currency of indexation.

The possible increases or decreases in the shareholders' equity and the income (for both, excluding tax effect) as per an assumption of devaluation of TL by 10% against currencies mentioned below at 31 December 2018 and 2017 are presented in the below table. The analysis below covers all foreign currency denominated assets and liabilities. The other variables, especially the interest rates are assumed to be fixed in this analysis.

	Change in currency rate in % (*)	Increase /(Decrease) Effect on profit or loss		Increase /(Decrease) Effect on equity excluding PL	
		31 December 2018	31 December 2017	31 December 2018	31 December 2017
USD	10 increase	8,170	120,218	8,170	120,218
USD	10 decrease	(8,170)	(120,218)	(8,170)	(120,218)
EUR	10 increase	11,190	(72,558)	11,190	(72,558)
EUR	10 decrease	(11,190)	72,558	(11,190)	72,558

(*) The effect on shareholders' equity also includes the effect of devaluation by 10% of TL against other currencies on the income before tax.

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

D. Credit risk

The Group is subject to credit risk through its trading, lending, hedging and investing activities and in cases where they act as intermediaries on behalf of customers or other third parties or issues guarantees.

Credit risk associated with trading and investing activities is managed through the Group's market risk management process.

The Group's primary exposures to credit risk arise through its loans and advances. The amount of credit exposure in this regard is represented by the carrying amounts (as per Local practice, carrying amount exclude interest) of these assets on the balance sheet. Internal risk ratings of corporate/commercial/medium size companies are assessed judgementally by relevant approval authorities. A statistical based internal risk rating model is developed, implementation will be planned in 2018 and this internal risk rating model is composed of an independent and objective assessment and is reviewed at least annually or during loan applications. Risk rating has become a requirement for loan applications, and ratings are used both to determine credit authorization limits and in credit assessment process.

The Group is exposed to credit risk on various other financial assets, including derivative instruments used for hedging and debt investments. The current credit exposure in respect of these instruments is equal to the carrying amount of these assets in the balance sheet. In addition, the Group is exposed to off balance sheet credit risk through guarantees issued.

In credit risk, there are no specific limitations for a specific geographical region. However, if there will be a risk which is affecting a specific region then the necessary limitation shall be applied and the necessary action shall be taken in order to revaluation of the risk. Risk monitoring and sectoral based customer group limitations are conducted. The limitations which are determined for a specific risk group are determined in accordance with Banking Regulation and other relevant regulations. Loan usages are monitored instantly by the system. The credits depending on a risk group are also evaluated in the consolidated financial tables.

According to HSBC Group standards, in all banking transactions approval and control mechanisms and systematically limit and risk control mechanisms are available. In assigning loan limits, extending credit, derivative and other future delivery derivative transactions are conducted depending to management's authorization, approval and control processes. Customer's and bank's treasury department staff based monitoring is conducted on determining daily risk limits and risk allocations with risk concentrations regarding the balance sheet and off-balance transactions conducted. Product based risk parameters are considered when allocating limits for the derivative products.

The Group is not exposed to significant credit risk as an active participant in the international banking market when evaluated with the financial activities of the other financial institutions.

Loan value of receivables from loans and other receivables are regularly traced in accordance with the relevant legislation, if necessary, actions such as limit increasing and decreasing, and strengthening the guarantee structure can be taken. The obtained financial tables regarding the credit requests should be audited in accordance with the relevant legislation. Bank's management has generated a customer degree (rating) system in order to determine loan value and the rate of risks of the corporate and personal loan customers which are subject to corporate.

Concentrations of credit risk (whether on or off balance sheet) that arise from financial instruments exist for groups of counterparties when they have similar economic characteristics that would cause their ability to meet contractual obligations to be similarly affected by changes in economic or other conditions.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

Bank Rating System:

The Bank's rating tool concentration by risk classes as of 31 December 2018 and 2017 is as follows:

		Concentration level (%)	
	Rating class	2018	2017
Above average	1-4	53.14	59.79
Average	5-6	31.08	29.22
Below average	7-10	15.79	10.99

The credit risk classification of each asset class is the following:

31 December 2018	Corporate	Retail	Total
Stage 1 loans to customers	8,217,303	2,933,974	11,151,276
Stage 2 loans to customers	3,592,847	747,796	4,340,643
Stage 3 loans to customers	294,468	588,623	883,091
Total gross	**12,114,630**	**4,274,717**	**16,389,347**
Less: Stage 1 loans to customers	(49,219)	(113,844)	(163,063)
Less: Stage 2 loans to customers	(646,407)	(113,377)	(759,784)
Less: Stage 3 loans to customers	(158,501)	(486,997)	(645,498)
Total expected credit loss	**(854,127)**	**(714,218)**	**(1,568,345)**
Total net	**11,260,503**	**3,560,499**	**14,821,002**

31 December 2017	Corporate	Retail	Total
Neither past due nor impaired	11,324,944	3,279,666	14,604,610
Past due not impaired	34,705	464,145	498,850
Individually impaired	563,947	536,936	1,100,883
Total gross	**11,923,596**	**4,280,747**	**16,204,343**
Less: allowance for individually impaired loans	(164,368)	(445,610)	(609,978)
Less: allowance for collectively impaired loans	(165,849)	(70,364)	(236,213)
Total allowance for impairment	**(330,217)**	**(515,974)**	**(846,191)**
Total net	**11,593,379**	**3,764,773**	**15,358,152**

Below table shows the due dates of the past due but not impaired loans,

	31 December 2018	31 December 2017
Loans contractually past due below 30 days	2,245,612	351,039
Loans contractually past due above 30 days and below 60 days	88,598	91,461
Loans contractually past due above 60 days and below 90 days	42,268	56,350
Total	**2,376,478**	**498,850**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

Loans and Advances Rescheduled:

Restructuring activities include extended and/or rescheduled payment arrangements, arrangement of terms of loan such as modification and deferral of payments, interest rate, foreign exchange ("FX") type, collateral structure, additional loan etc, there can also be alternatives of granting additional loan or sale of collaterals, sale of debts.

Restructuring may be applied for watch-listed loans or loans in nonperforming loan accounts. If restructuring is applied for a watch-listed loans, that loans will stay in performing loan accounts but its terms (FX rate, payment dates, interest rate etc) may be changed.

As of 31 December 2018, the total amount of restructured loans is TL 2,659,679 (2017: TL 523,159) of which TL 6,800 (2017: TL 34,565) is impaired.

31 December 2018	Past due but not impaired	Neither past due nor impaired	Impaired
Corporate	1,187,299	1,407,958	1,818
Retail	63,263	1,159	4,982
Total	**1,250,562**	**1,409,117**	**6,800**

31 December 2017	Past due but not impaired	Neither past due nor impaired	Impaired
Corporate	262,278	163,273	32,925
Retail	36,677	60,931	1,640
Total	**298,955**	**224,204**	**34,565**

Industry sectors:

The Group uses BRSA definitions for the economic sectors in order to be able to make comparisons with the banking sector wide figures. The Board of Directors sets the sectoral limits on lending, and these limits can only be altered by a decision from the Board of Directors. According to credit policy, each individual sector should not exceed the targeted level of 15% on the overall corporate portfolio. The sector concentration is accordingly monitored and reported on a regular basis. Particular attention is given to some sectors which are considered as "low performers" in terms of high non-performing loan ("NPL") levels. Macroeconomic conditions, NPL levels, expectations about sectors and HSBC group policies are taken into consideration in setting and altering the limits. Sectoral classification is defined in terms of the borrower's activity area, not based on collaterals.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

	31 December 2018		31 December 2017	
	Cash	Non-cash	Cash	Non-cash
Agricultural				
Farming and raising livestock	2,453	-	57,392	105
Forestry	-	-	52	-
Fishing	48,474	-	26,067	-
Manufacturing				
Mining	31,171	16	15,056	16
Production	5,821,490	1,553,610	5,196,193	1,008,606
Electric, gas and water	522,175	48,264	436,235	32,193
Construction	1,409,205	526,545	991,051	404,305
Services				
Wholesale and retail trade	1,515,771	531,843	1,465,233	455,240
Hotel, food and beverage services	265,773	54,011	302,442	3,530
Transportation and telecommunication	923,970	38,920	691,327	38,705
Financial Institutions	501,021	721,759	1,048,574	742,930
Real estate and renting services	1,111,575	161,878	5,532	1,563
Self-employment services	96,801	5,703	775,380	100,342
Education services	-	90	199	90
Health and social services	101,482	13,271	164,133	9,503
Other	2,469,641	2,252	4,183,286	-
Total	**14,821,002**	**3,658,162**	**15,358,152**	**2,797,128**

Rating of debt securities:

	31 December 2018		31 December 2017	
Moody's credit rating model	**Trading securities**	**Investment securities**	**Trading securities**	**Investment securities**
Financial assets:				
Aaa	-	-	-	-
A1, A2, A3	-	-	-	-
Baa1, Baa2, Baa3	-	-	-	-
Ba1	-	-	278,421	1,363,506
Ba2 (*)	-	-	-	-
Ba3	27,013	511,129	-	-
Total	**27,013**	**511,129**	**278,421**	**1,363,506**

(*) Turkey Government's rating has been downgraded to Ba3 as of 17 August 2018.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

Gross maximum exposure:

The below table shows the worst case scenario of credit risk exposure in the absence of any collateral;

	2018	2017
Cash and cash equivalents	4,086,244	926,369
Restricted deposits with central bank	75,281	1,287,604
Loans and advances to banks	8,470,450	2,166,192
Financial assets at fair value through profit or loss		
- Trading securities	27,013	278,421
- Trading derivatives	1,001,127	695,310
- Equity Instruments	20,223	-
Loans and advances to customers	14,821,002	15,358,152
Financial assets measured at fair value through OCI	511,129	-
Available for sale assets	-	1,363,506
Other assets	505,213	152,848
Total assets	**29,517,682**	**22,228,402**
Credit related commitments	3,658,162	2,797,128
Non-cancellable commitments	3,828,455	4,609,098
Total commitments	**7,486,617**	**7,406,226**
Total credit risk exposure	**37,004,299**	**29,634,628**

Allowances for impairment:

The Group establishes an allowance for impairment losses that represents its estimate of incurred losses in its loan portfolio. The Group takes a prudent approach its criteria for assessing whether objective evidence of impairment exists, to interpretation of the term ‘objective evidence’ and to quantifying impairment allowance requirements. The main components of this allowance are a specific loss component that relates to individually significant exposures, and a portfolio-basis loan loss allowance established for groups of homogeneous assets in respect of losses that have been incurred but have not been identified on loans subject to individual assessment for impairment.

Write-off policy:

The Group writes off a receivable balance (and uses related allowances for impairment losses) when it is determined that the receivable is uncollectible based on the evidence of insolvency issued by the Court. As per local limitation, there is no contractual write-off on a regular basis. Accounts also can be written off through NPL sales which are performed on average annual basis.

Collateral policy:

The Group’s policy is to require suitable collateral to be provided by certain customers prior to the disbursement of approved loans. The Group currently holds collateral against loans and advances to customers in the form of mortgage interests over property, other registered securities over assets and guarantees. Collateral generally is not held over loans and advances to banks, except when securities are held as part of reverse repurchase and securities borrowing activity. Collateral usually is not held against investment securities, and no such collateral was held at 31 December 2018 and 2017.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

Guarantees and letters of credit are also subject to strict credit assessments before being provided. The agreements specify monetary limits to the Group's obligations. The extent of collateral held for performing non cash loans are 0.71%.

The breakdown of performing cash and non-cash loans and advances to customers by type of collateral is as follows:

	31 December 2018	31 December 2017
Cash loans		
Secured loans:		
Secured by cash collateral	268,768	130,092
Secured by mortgages	1,897,626	827,711
Secured by other collaterals	6,941,654	7,249,068
Unsecured loans	6,399,385	6,793,655
Total performing loans	**15,507,433**	**15,000,526**
Non cash loans		
Secured loans:		
Secured by cash collateral	15,158	19,733
Secured by mortgages	-	2,248
Unsecured loans	3,643,004	2,775,147
Total non-cash loans	**3,658,162**	**2,797,128**

Estimates of the fair value of collateral held against non-performing loans are as follows:

	31 December 2018	31 December 2017
Mortgage	281,582	397,974
Car pledges	227	6,772
Cash pledges	-	485
Total	**281,809**	**405,231**

E. Operational risk

Operational risk expresses the probability of loss that may arise from the overlook of faults and inconsistency with the established rules due to the deficiencies in the Group's internal controls, manner of the management and the personnel that are not in coherence with time and conditions, deficiencies in the bank management, faults and problems in information technology systems and disasters such as earthquake, fire, flood or terror attacks.

The operational risk items in the Bank are determined in accordance with the definition of operational risk by considering the whole processes, products and departments. The control areas are set for operational risks within the Bank and assigning the risks to these control areas follows operational risks. In this context, appropriate monitoring methodology is developed for each control area that covers operational risks and control frequencies are determined. In addition, the Bank monitors and stores operational risk data, based on business segments.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

For the regulatory purposes and consideration in statutory capital adequacy ratio, on a consolidated base the Group calculates the amount subject to operational risk with the basic indicator method in accordance with the Section 4 of the " Regulation Regarding Measurement and Evaluation of Banks' Capital Adequacy Ratio" published in the Official Gazette No. 29511 dated 23 October 2015, namely "The Calculation of the Amount Subject to Operational Risk", based on the gross income of the Group for the years ended 2018, 2017 and 2016. The annual gross income is defined as net interest income plus net non-interest income reduced by realised gains/losses from the sale of securities Financial assets measured at fair value through OCI sale and held-to-maturity, non-recurring gains and income derived from insurance claims. As of 31 December 2018, the total amount subject to operational risk is calculated as TL 2,819,385 (2017: TL 3,088,379) and the amount of the related capital requirement is TL 225,551 (2017: TL 247,070).

F. Capital management

Banks in Turkey are required to comply with capital adequacy guidelines promulgated by the BRSA, which are based upon the standards established by the Bank of International Settlements ("BIS"). These guidelines require banks to maintain adequate levels of regulatory capital against risk-bearing assets and off-balance sheet exposures.

A bank's capital adequacy ratio is calculated by taking the aggregate of its CET1 capital (which comprises paid-in capital, reserves, retained earnings and profit for the current periods minus period loss (if any)) ,its Tier I capital (which comprises certain qualified subordinated loans in accordance with BIS guidelines) and its Tier II capital (which comprises general loan and free reserves, revaluation funds and subordinated loans obtained) minus deductions (which comprises deferred tax assets, intangibles, etc.), and dividing this aggregate by risk weighted assets, which reflect both credit risk and market risk. In accordance with these guidelines, banks must maintain a total capital adequacy ratio of a minimum of 12% including 4% prudential buffer.

The Bank and its individually regulated operations have complied with externally imposed capital requirements throughout the current and prior period. The Group's regulatory capital position on a consolidated basis is as follows:

	31 December 2018	**31 December 2017**
Tier I capital	2,791,685	2,373,987
Tier II capital	1,679,960	1,250,046
Deductions	(9,603)	(2,497)
Total regulatory capital	**4,462,042**	**3,621,536**
Amount subject to credit risk	18,348,241	16,823,641
Amount subject to market risk	1,003,877	578,325
Amount subject to operational risk	2,819,385	3,088,379
Capital adequacy ratio (%)	**20.13%**	**17.67%**

G. Fair value of financial instruments

Fair value is the amount at which a financial instrument could be exchanged in a current transaction between willing parties, other than in a forced sale or liquidation, and it is best evidenced by a quoted market price, if one exists.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

The estimated fair values of financial instruments have been determined by the Group using the available market information and appropriate valuation methodologies. However, judgement is required to interpret market data in developing the estimated fair value. Accordingly, the estimates presented herein are not necessarily the amounts the Group would realise in a current market exchange.

The following table summarises the carrying amounts and fair values of those financial assets and liabilities not presented at their fair value in the Group's balance sheet.

	31 December 2018		31 December 2017	
	Carrying value	**Fair value**	**Carrying value**	**Fair value**
Financial assets:				
Loans and advances to banks	8,470,450	8,470,450	2,166,192	2,66,192
Loans and advances to customers	14,821,002	14,803,322	15,358,152	15,286,829
Financial liabilities:				
Deposits from banks	1,876,508	1,876,508	1,509,403	1,509,403
Deposits from customers	22,977,440	23,126,166	14,838,829	14,871,173
Other borrowed funds	2,783,586	2,780,497	3,704,777	3,847,880

The following methods and assumptions were used to estimate the fair value of the Group's financial instruments:

Loans and advances to banks

The fair value of overnight deposits is considered to approximate its carrying amounts. The estimated fair value of interest bearing placements is based on discounted cash flows using prevailing money market interest rates at the balance sheet date with similar credit risk and remaining maturity.

Loans and advances to customers

Loans and advances to customers are net of allowances for impairment. The estimated fair value of loans and advances to customers represent the discounted amount of estimated future cash flows expected to be received. Expected cash flows are discounted at current market rates with similar credit risk, currency and remaining maturity to determine their fair value.

Deposits from customers, deposits from banks and other borrowed funds

The estimated fair value of deposits with no stated maturity, which includes non-interest bearing deposits, is the amount repayable on demand.

The estimated fair value of other borrowings without quoted market price is based on discounted cash flows using money market interest rates prevailing at the balance sheet date with similar credit risk, currency and remaining maturity.

The estimated fair value of deposits from customers is considered to approximate its carrying amounts as the average maturity is relatively lower.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

Fair value hierarchy

IFRS 7 requires disclosure of classification of the financial instruments carried at fair value in financial statements according to the defined levels. These levels depend on the observability of the data used during fair value calculations. Classification for fair value is generated as follows:

Level 1: The fair value of financial assets and financial liabilities with standard terms and conditions and traded on active liquid markets determined with reference to quoted market prices.

Level 2: The fair value of other financial assets and financial liabilities are determined in accordance with generally accepted pricing models which are based on discounted cash flow analysis using prices from observable current market transactions.

Level 3: The fair value of the financial assets and financial liabilities where there is no observable market data.

There were no transfers between Levels 1, Level 2 and Level 3 during the period.

There were no changes in calculation techniques during the period.

According to the stated classification principles, the Group's classification of financial assets and liabilities carried at their fair value are as follows:

Assets and liabilities measured at fair value

31 December 2018	Level 1	Level 2	Level 3	Total
Financial assets at fair value through profit and loss				
- Debt securities	27,013	-	-	27,013
- Trading derivatives	-	1,001,127	-	1,001,127
Financial assets measured at fair value through OCI				
- Debt securities	511,129	-	-	511,129
Total assets	**538,142**	**1,001,127**	**-**	**1,539,269**
Trading derivatives	-	941,094	-	941,094
Total liabilities	**-**	**941,094**	**-**	**941,094**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 4 - FINANCIAL RISK MANAGEMENT (Continued)

31 December 2017	Level 1	Level 2	Level 3	Total
Financial assets at fair value through profit and loss				
- Debt securities	278,421	-	-	278,421
- Trading derivatives	-	680,529	-	680,529
- Equity Instruments	-	-	-	-
Hedging derivatives				
Available-for-sale financial assets				
- Debt securities	1,363,506	-	-	1,363,506
Total assets	**1,641,927**	**680,529**	**-**	**2,322,456**
Trading Derivatives	-	739,860	-	739,860
Hedging Derivatives	-	-	-	-
Total liabilities	**-**	**739,860**	**-**	**739,860**

F. Fiduciary activities

The Group provides custody services to third parties. Those assets that are held in a fiduciary capacity are not included in these consolidated financial statements. Fiduciary capacity of the Group is as follows:

	31 December 2018	31 December 2017
Investment securities held in custody	93,812,591	35,544,500
Other securities held in custody	4,497,407	2,239,418
Commercial notes received for collection	217,401	159,074
Cheques received for collection	99,473	805,628
Portfolio and investment funds held in custody	-	1,375,193
Other assets received for collection	-	8,582
Total	**98,626,872**	**40,132,395**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 5 - CASH AND CASH EQUIVALENTS

For cash flow statement purposes; cash includes cash on hand, cash in transit, purchased bank cheques, and demand deposits including balances with the Central Bank; cash equivalents include interbank money market placements, reserve deposit unblocked accounts, time deposits at banks with original maturity of less than three months.

	31 December 2018	31 December 2017
Cash on hand	649,779	256,474
Demand deposits with central banks	4,086,244	2,359,377
Loans and advances to banks (with original maturity less than three months)	8,452,622	2,159,611
Cash and cash equivalents in the statement of cash flows	**13,188,645**	**4,775,462**

Accruals from advances to banks amounting to TL 17,828 (2017: TL 6,581) have not been included in cash and cash equivalents.

NOTE 6 - CASH AND BALANCES WITH THE CENTRAL BANK

	31 December 2018	31 December 2017
Cash and cash equivalents		
FC	565,458	185,218
TL	84,321	71,256
	649,779	**256,474**
Demand deposits at the Central Banks		
FC	1,849,985	466,606
TL	2,256,577	1,899,730
	4,106,562	**2,366,336**
Reserve deposits at the Central Banks		
FC	1,309,114	1,280,645
TL	-	-
	1,309,114	**1,280,645**
Total	**6,065,455**	**3,903,455**

The banks operating in Turkey are subject to the Central Bank of the Republic of Turkey's Communiqué numbered 2013/15 and are required to keep a deposit at the CBRT for their Turkish Lira, USD and/or Euro and standard gold.

As of 31 December 2018, the reserve deposit rates vary according to their maturity structure; the reserve deposit rates are realized between 1.50% and 8% (31 December 2017: 4% - 10.50%) for TL deposits and other liabilities, and between 4% and 20% for FC deposits (31 December 2017: 4% - 24%).

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 7 - LOANS AND ADVANCES TO BANKS

	31 December 2018			31 December 2017		
	TL	**FC**	**Total**	**TL**	**FC**	**Total**
Loans and advances-demand:						
Domestic banks	-	-	-	-	-	-
Foreign banks	-	4,970	4,970	-	10,306	10,306
	-	**4,970**	**4,970**	**-**	**10,306**	**10,306**
Loans and advances-time:						
Domestic banks	30,422	2,656	33,078	27,294	-	133,338
Foreign banks	-	16,915	16,915	821	332,806	227,583
Interbank money market	369,999	8,045,488	8,415,487	210,424	1,584,541	1,794,965
	400,421	**8,065,059**	**8,465,480**	**238,539**	**1,917,347**	**2,155,886**
Total gross loans and advances to banks	**400,421**	**8,070,029**	**8,470,450**	**238,539**	**1,927,653**	**2,166,192**
Total loans and advances to banks	**400,421**	**8,070,029**	**8,470,450**	**238,539**	**1,927,653**	**2,166,192**

NOTE 8 - FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT OR LOSS

	31 December 2018	**31 December 2017**
Derivative financial instruments	1,001,127	680,529
Government bonds and treasury bills	27,013	278,421
Equity Instruments	20,223	-
Total financial assets at fair value through profit or loss	**1,048,363**	**958,950**

The Group has financial assets at fair value through profit or loss as collateral/blocked amounting to TL 3,708 (2017: TL 3,656) as of 31 December 2018. The group have no trading securities subject to repurchase as of 31 December 2018 (2017: None). Government bonds and treasury bills are discount and coupon securities issued by the Government of the Republic of Turkey.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 9 - DERIVATIVE FINANCIAL INSTRUMENTS AND HEDGING ACTIVITIES

The notional amounts of certain types of financial instruments provide a basis for comparison with instruments recognised on the balance sheet but do not necessarily indicate the amounts of future cash flows involved or the current fair value of the instruments, and therefore, do not indicate the Group's exposure to credit or price risks. The derivative instruments become favourable (assets) or unfavourable (liabilities) as a result of fluctuations in foreign exchange rates and interest rates based on their terms.

31 December 2018		**Fair values**	
	Contract/notional amount	**Assets**	**Liabilities**
Derivatives held for trading			
Foreign exchange derivatives:			
Currency forwards	11,032,975	490,631	161,703
Currency swaps	30,088,486	128,525	406,032
OTC currency options	9,817,390	245,793	246,214
Total foreign exchange derivatives	**50,938,851**	**864,949**	**813,949**
Interest rate derivatives:			
Interest rate swaps	25,273,234	79,509	79,157
Cross-currency interest rate swaps	5,463,059	56,669	47,988
Total interest rate derivatives	**30,736,293**	**136,178**	**127,145**
Total derivative assets/ (liabilities) held for trading	**81,675,144**	**1,001,127**	**941,094**
Total recognised derivative assets/ (liabilities)	**81,675,144**	**1,001,127**	**941,094**

31 December 2017		**Fair values**	
	Contract/notional amount	**Assets**	**Liabilities**
Derivatives held for trading			
Foreign exchange derivatives:			
Currency forwards	9,724,971	127,210	60,145
Currency swaps	48,416,638	191,401	342,520
OTC currency options	10,427,532	223,505	223,998
Total foreign exchange derivatives	**68,569,141**	**556,897**	**626,663**
Interest rate derivatives:			
Interest rate swaps	18,391,364	72,441	53,985
Cross-currency interest rate swaps	3,385,742	65,972	59,212
Total interest rate derivatives	**21,777,106**	**138,413**	**113,197**
Total derivative assets/ (liabilities) held for trading	**90,346,247**	**680,529**	**739,860**
Total recognised derivative assets/ (liabilities)	**90,346,247**	**680,529**	**739,860**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 10 - LOANS AND ADVANCES TO CUSTOMERS

At 31 December 2018 and 2017, distribution of the loan portfolio of the Bank by nature is as follows:

	31 December 2018	31 December 2017
Consumer loans		
-Mortgage loans	543,533	730,291
-Consumer loans	737,544	834,420
-Automotive loans	6,126	6,636
-Overdraft accounts	196,848	207,573
Credit cards		
-Retail	2,198,532	2,366,086
-Corporate	3,943	3,160
Corporate and commercial loans		
- Discount and purchase notes	271,753	1,407
- Export loans	826,932	321,418
- Loans to financial institutions	284,571	350,745
- Commercial instalment loans	132,818	255,634
- Corporate loans	10,112,551	9,631,877
- Factoring receivables	192,282	394,213
Total performing loans	**15,507,433**	**15,103,460**
Total impaired loans	881,914	1,100,883
Total gross loans	**16,389,347**	**16,204,343**
Provision for impairment	(1,568,345)	(846,191)
Loans and advances to customers	**14,821,002**	**15,358,152**

At 31 December 2018 and 2017 factoring receivables comprised the following:

	31 December 2018	31 December 2017
Factoring receivables in Turkish Lira	192,282	394,213
Factoring receivables in foreign currencies	-	-
Factoring receivables, net	**192,282**	**394,213**

Reconciliation of allowance account for losses on loans and advances is as follows:

	31 December 2018			
	Corporate	Consumer	Credit Cards	Total
At 1 January	**330,217**	**165,858**	**350,116**	**846,191**
Impact of adopting IFRS 9	31,253	60,646	233,763	325,662
Provision for loan impairment	502,111	63,354	(44,979)	520,486
Amounts recovered during the year	(9,141)	(52,889)	(58,718)	(120,748)
Loans written off during the year as uncollectible (-) (*)	(313)	(1,647)	(1,286)	(3,246)
At 31 December	**854,127**	**235,322**	**478,896**	**1,568,345**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 10 - LOANS AND ADVANCES TO CUSTOMERS (Continued)

	31 December 2017			
	Corporate	**Consumer**	**Credit Cards**	**Total**
At 1 January	**321,178**	**371,851**	**653,133**	**1,346,162**
Provision for loan impairment	187,522	50,455	108,363	346,340
Amounts recovered during the year	(135,831)	(38,356)	(58,914)	(233,101)
Loans written off during the year as uncollectible (-) (*)	(42,652)	(218,092)	(352,466)	(613,210)
At 31 December	**330,217**	**165,858**	**350,116**	**846,191**

(*) The Parent Bank has concluded the sale of non-performing corporate and commercial loans amounting to TL 67,171 for TL 16.797 in 27 March 2017 and the sale of non-performing credit cards and retail loans amounting to TL 540,335 for TL 49,300 in 21 September 2017.

NOTE 11 - INVESTMENT SECURITIES

	31 December 2018	**31 December 2017**
Debt securities - at fair value:		
Government bonds and treasury bills	511,129	1,349,065
Unlisted equity securities	-	14,441
Total securities	**511,129**	**1,363,506**

Government bonds, treasury bills and Eurobonds are discount and coupon securities issued by the Government of the Republic of Turkey. At 31 December 2018, investments securities amounting to TL 502,515 (2017: TL 311,891) were pledged to third parties, namely Central Bank of the Republic of Turkey for legal requirements, ISE Settlement and Custody Bank Inc. and other financial institutions as a guarantee for stock exchange and money market operations. The Group has no investment securities subject to repurchase agreement as of 31 December 2018 (2017: None). As of 31 December 2018, the Group has financial assets available for sale in unrestricted account amounting to TL 8,614 (2017: TL 1,051,615).

Movements of securities measured at fair value through OCI are shown as follows:

	31 December 2018	**31 December 2017**
At January 1	1,363,506	1,434,889
Additions	147,633	1,591,084
Disposal (Sale and redemption)	(903,718)	(1,498,283)
Valuation differences	(76,069)	(164,184)
Reclassification due to IFRS 9	(20,223)	-
Total	**511,129**	**1,363,506**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 12 - INTANGIBLE ASSETS

	31 December 2018	31 December 2017
Gross book value	407,389	382,399
Accumulated depreciation (-)	256,435	234,469
Net book value	**150,954**	**147,930**

Movements of intangible assets were as follows:

	31 December 2018	31 December 2017
Opening balance	**147,930**	**128,000**
Additions	24,311	36,260
Depreciation (-)	21,287	16,330
Closing Net Book Value	**150,954**	**147,930**

NOTE 13 - PROPERTY AND EQUIPMENT

Prior Period End:	Land and Buildings	Vehicles	Other	Total
Cost	20,021	62	352,795	372,878
Accumulated Depreciation and Impairment (-)	11,812	62	278,333	290,207
Net Book Value	**8,209**	**-**	**74,462**	**82,671**

Current Period End	Land and Buildings	Vehicles	Other	Total
Net Book Value at the Beginning	8,209	-	74,462	82,671
Additions	46	10,444	39,667	50,157
Disposals (-) (net)	1,089	-	7,010	8,099
Depreciation (-)	304	187	22,361	22,852
Cost at Period End	18,978	10,506	385,452	414,936
Accumulated Depreciation at Period End (-)	12,116	249	300,694	313,059
Closing Net Book Value	**6,862**	**10,257**	**84,758**	**101,877**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 14 – OTHER ASSETS

	31 December 2018	31 December 2017
Miscellaneous receivables (*)	352,032	130,915
Collaterals given	153,181	43,316
Prepaid expenses	39,932	45,131
Income accruals	28,654	19,614
Asset held for resale	1,369	1,825
Other	87,117	23,962
Total	**662,285**	**264,763**

(*) Includes collateral due to derivative and BIST transactions.

Assets held for resale represent mainly foreclosed assets received against uncollectible loans and advances to customers, to be sold as required by the Turkish Banking Law. Movements in assets held for resale at 31 December 2018 and 2017 were as follows:

	2018	2017
At 1 January	**1,825**	**2,896**
Additions	155	1,620
Disposals	(611)	(2,691)
At 31 December	**1,369**	**1,825**

NOTE 15 - DEPOSITS FROM BANKS

	2018			2017		
	Demand	**Term**	**Total**	**Demand**	**Term**	**Total**
Foreign currency:						
Domestic banks	-	-	-	-	-	-
Foreign banks	15	-	15	10	-	10
	15	**-**	**15**	**10**	**-**	**10**
TL:						
Domestic banks	-	-	-	-	-	-
Foreign banks	132,870	1,744,608	1,877,478	57,592	1,451,801	1,509,393
	132,870	**1,744,608**	**1,877,478**	**57,592**	**1,451,801**	**1,509,393**
Total	**132,885**	**1,744,608**	**1,877,493**	**57,602**	**1,451,801**	**1,509,403**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 16 - DEPOSITS FROM CUSTOMERS

	31 December 2018			31 December 2017		
	Demand	**Term**	**Total**	**Demand**	**Term**	**Total**
Foreign currency deposits:						
Saving deposits	1,418,568	9,776,711	11,195,280	1,140,775	6,789,917	7,930,692
Commercial deposits	278,884	3,823,946	4,102,830	614,822	1,346,943	1,961,765
Gold deposits	235,468	113,734	349,202	176,338	79,865	256,203
	1,932,920	**13,714,391**	**15,647,311**	**1,931,935**	**8,216,725**	**10,148,660**
TL deposits:						
Saving deposits	287,253	4,989,109	5,276,362	327,489	3,131,332	3,458,821
Commercial deposits	516,665	1,534,686	2,051,351	365,775	857,979	1,223,754
Public sector deposits	2,416	-	2,416	7,594	-	7,594
	806,334	**6,523,795**	**7,330,129**	**700,858**	**3,989,311**	**4,690,169**
Total	**2,739,254**	**20,238,186**	**22,977,440**	**2,632,793**	**12,206,036**	**14,838,829**

NOTE 17 - OTHER BORROWED FUNDS

	31 December 2018	31 December 2017
Subordinated debts	1,545,585	1,100,050
Other foreign institutions and banks	1,238,001	2,604,727
Domestic banks	-	-
Total	**2,783,586**	**3,704,777**

NOTE 18 - TAXATION

	31 December 2018	31 December 2017
Current tax expense	(10,811)	(6,711)
Deferred tax (expense)/income	(32,525)	194,446
Tax (expense)/income	**(43,336)**	**187,735**
Provision for current taxes payable on income	4,103	1,044
Current income taxes payable	**4,103**	**1,044**

In accordance with the related regulation for prepaid taxes on income, such advance payments during the year are being deducted from the final tax liability for the year. Accordingly, the taxation charge on income is not equal to the final tax liability appearing on the balance sheet. Turkish tax legislation does not permit a parent company and its subsidiaries to file a consolidated tax return. Therefore, provisions for taxes, as reflected in these consolidated financial statements, have been calculated on a separate-entity basis.

NOTE 18 - TAXATION (Continued)

Under the Corporate Tax Law numbered 5520, the applicable corporate tax rate is 20%, however, the corporate income tax rate will be applied as 22% for the years 2018, 2019, and 2020 regarding to the "Law on Amendment of Certain Tax Laws and Some Other Laws" numbered 7061 and published in the Official Gazette on 5 December 2017. Corporate tax is payable at a rate of 22% over the corporate tax base of the Bank after adjusting for certain disallowable expenses, exempt income, investment allowance and other additions and deductions.. The annual corporate income tax return is required to be filed until 25th day of the fourth month following the close of the related fiscal year. Payments will be carried out in single instalment until the end of the month in which the tax return is to be filed.

Dividends paid to non-resident corporations, which have a fixed place of business or permanent representative in Turkey, or resident corporations are not subject to withholding tax. Otherwise, dividends paid are subject to withholding tax at the rate of 15%. An increase in capital via issuing bonus shares is not considered as a profit distribution and thus does not incur withholding tax.

Corporations are required to pay advance corporation tax quarterly at the rate of 22% on their quarterly determined corporate income. Advance tax return is filed by the 14th of the second month following each quarterly period and is payable on the 17th of the same month. Advance tax paid by corporations is credited against the annual corporation tax liability. The balance of the advance tax paid may be refunded or used to offset against other liabilities to the government. In accordance with the related regulation for prepaid taxes on income, such advance payments during the year are being deducted from the final tax liability for the year. Accordingly, the taxation charge on income is not equal to the final tax liability appearing on the balance sheet.

50% of the capital gains of corporations from sale of participation shares and property which have been in their assets at least for two years is exempt from corporate tax provided that this amount is kept in a special reserve account in the liabilities side of the balance sheet for 5 years.

In Turkey, there is no procedure for a final and definitive agreement on tax assessments, Tax authorities have the right to audit tax declarations and accounting records for 5 years, and may issue re-assessment based on their findings for tax purposes.

Under the Turkish taxation system, tax losses can be carried forward to offset against future taxable income for up to 5 years, tax losses cannot be carried back to offset profits from previous periods.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 18 - TAXATION (Continued)

Reconciliation between the theoretical tax amount that would arise using the basic tax rate of the Bank and the actual taxation charge for the year is stated below:

	31 December 2018	31 December 2017
Profit before income taxes	**136,381**	**181,399**
Theoretical income tax of the applicable tax rate of 22%	(30,004)	(39,908)
Deferred tax asset previously not recognized	-	200,149
Other tax charges	(13,332)	27,494
Tax (expense)/income	**(43,336)**	**187,735**

Deferred income taxes

The deferred tax is calculated using the enacted tax rates that are valid as of the balance sheet date in accordance with the tax legislation in force. According to the Law, which was approved in the Grand National Assembly on 28 November 2017 and published in the Official Gazette dated 5 December 2017, the rate of Corporate Tax for the years 2018, 2019 and 2020 was increased from 20% to 22%. Therefore, deferred tax assets and liabilities are measured at the tax rate of 22% that are expected to apply to these periods when the assets is realised or the liability is settled, based on the Law that have been enacted. For the periods 2021 and after, the reversals of temporary differences are measured by 20%.

Deferred tax assets calculated as of 31 December 2018 amounting to TL 240,995 (31 December 2017: TL 199,829) was recognised in the financial statements. This assessment will be re-performed at each reporting period.

The temporary differences giving rise to the deferred income tax assets and deferred income tax liabilities are as follows:

	Temporary Differences	DTA/DTL	Temporary Differences	DTA/DTL
	31 December 2018		31 December 2017	
Allowance for loan impairment	911,591	182,318	267,988	53,601
Unearned revenue	60,314	13,269	60,566	13,324
Bonus Provision	59,886	13,173	37,446	8,238
Carry-forward tax losses	55,139	12,131	293,780	64,632
Retirement benefit obligations	54,775	11,341	55,835	11,561
Restructuring Provisions	49,459	10,881	85,965	18,912
Litigation Provisions	38,542	8,479	34,521	7,595
Unrealized gains on derivative instruments	-	-	50,980	11,638
Vacation pay liability	8,653	1,904	7,681	1,690
Accrued bonus point on credit cards	4,623	1,017	4,809	1,058
Other	36,363	8,000	54,621	11,936
Deferred tax assets		**262,515**		**204,184**
Unrealized gains on derivative instruments	(60,032)	(13,089)	-	-
Difference between carrying value and tax base of property and equipment	(20,203)	(4,211)	(19,129)	(4,140)
Other	(19,181)	(4,220)	(978)	(215)
Deferred tax liabilities		**(21,520)**		**(4,355)**
Deferred tax assets, net		**240,995**		**199,829**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 18 - TAXATION (Continued)

The movements of deferred income taxes at 31 December 2018 and 31 December 2017 were as follows:

	31 December 2018	31 December 2017
Balance at 1 January	**199,829**	**872**
Charge for the year, net	(32,525)	194,446
IFRS 9 transition impact	67,134	-
Tax assets/(liabilities) recognised in other comprehensive income	6,557	4,512
Balance at 31 December	**240,995**	**199,829**

Income tax effects relating to components of other comprehensive income:

	31 December 2018			31 December 2017		
	Before tax amount	Tax (expense) benefit	Net-of-tax amount	Before tax amount	Tax (expense) benefit	Net-of-tax amount
Fair value changes of financial assets measured at fair value through OCI	(30,217)	6,614	(23,470)	(18,128)	3,626	(14,502)
Cash flow hedges	(2,831)	568	(2,411)	2,434	(487)	1,947
Actuarial gain/(loss) related to employee benefits	3,124	(625)	2,514	(6,863)	1,373	(5,490)
Other comprehensive income for the year (net presentation)	**(29,924)**	**6,557**	**(23,367)**	**(22,557)**	**4,512**	**(18,045)**

NOTE 19 - OTHER PROVISIONS

	31 December 2018	31 December 2017
Provision for outstanding legal cases	32,467	31,615
Provisions for refunds related to the applications to the Arbitration Committee	6,370	2,070
Provision for accumulated credit card bonus	4,623	4,809
Provision for refunds related to case document charges	1,284	2,370
Restructuring provision	49,459	85,965
Other (*)	53,113	52,486
Total	**147,316**	**179,315**

(*) Contains other provisions as a part of IAS 37.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 20 - EMPLOYEE BENEFITS

The Group's obligations with respect to the employee benefits are as follows:

	31 December 2018	31 December 2017
Reserve for post-employment benefit obligations	56,629	57,539
Bonus provision	66,051	41,920
Provision for unused annual vacation	8,952	8,040
Total	**131,632**	**107,499**

The movement in the reserve for employee benefits is as follows:

	31 December 2018	31 December 2017
Balance at 1 January	**57,539**	**55,220**
Service cost	8,675	7,908
Interest cost	5,805	5,042
Paid during the year	(12,266)	(12,053)
Actuarial loss/(gain)	(3,124)	6,863
Balance at 31 December	**56,629**	**57,539**

As of 31 December 2018 the Group has employee termination benefit provision amounting to TL 56,629 (31 December 2017: TL 57,539), and unused vacation provision amounting to TL 8,952 (31 December 2017: TL 8,040).

In accordance with existing Turkish Labour Law, the Group is required to make lump-sum termination indemnities to each employee who has completed one year of service with the Bank and whose employment is terminated due to retirement or for reasons other than resignation or as mentioned in related legislation.

The computation of the liability is based upon the retirement pay ceiling announced. The applicable ceiling amount as of 31 December 2018 is TL 5,434.42 (full TL) (31 December 2017: TL 4,732.49 (full TL)). Employee termination benefit liability is not legally dependent on any kind of funding, and there is no requirement on funding.

The reserve for employment termination benefits represents the present value of the estimated total liability for the future probable obligation of the Group determined by using certain actuarial assumptions. IAS 19 requires actuarial valuation methods to be used in order to calculate Bank's liabilities.

The assumption is that retirement pay ceiling is expected to increase as per the inflation rate every year. Thus discount rate applied shall represent real rate, net of inflation. Since retirement pay ceiling amount is determined once every six months, employee benefit liability of the Bank is calculated from the ceiling amount valid from 1 July 2018, TL 5,434.42 (full TL) (31 December 2017: TL 4,732.49 (full TL)).

Accordingly to the following financial and demographical actuarial assumptions were used in the calculations of the provision:

	31 December 2018	31 December 2017
Discount rates	4.50%	2.78%
Interest rates	16.00%	11.00%
Rate of salary increases	12.4%	8.00%
Rate of price inflation	11.00%	8.00%

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 21 - OTHER LIABILITIES

	31 December 2018	31 December 2017
Payables from credit card transactions	192,646	217,748
Unearned income	69,051	75,351
Administrative payable	142,539	86,549
Clearing accounts	31,018	61,739
Miscellaneous taxes payable	54,802	43,622
Clearing checks	53,244	10,170
Saving deposits insurance fund payable	8,060	7,218
Import deposit and transfer orders	3,074	4,789
Reserves on credit cards and promotion campaigns	4,625	4,809
Collaterals for derivatives	1,225	8,591
Other	50,885	15,615
Total	**611,169**	**536,201**

NOTE 22 - SHARE CAPITAL

At 31 December 2018, the total statutory nominal value of authorised and paid-in share capital of the Bank is TL 652,290 (2017: TL 652,290) comprising 65,229,000,000 (2017: 65,229,000,000) registered shares of TL 0.01 each. At 31 December 2018 and 2017, inflation adjustment effect of share capital is TL 287,335.

Based on the approval of the Banking Regulation and Supervision Agency dated 21 June 2017, 10,01% share of HSBC Bank Plc.'s 100% ownership of the Bank's capital was transferred to HSBC Bank Middle East Limited and remaining 89,99% share of HSBC Bank Plc. was transferred to HSBC Middle East Holdings B.V. through share transfer agreement dated 29 June 2017.

The issued and fully paid-in share capital is as follows:

	31 December 2018	
Shareholders	**Participation rate (%)**	**TL**
HSBC Middle East Holdings B.V.	89.99	586,996
HSBC Bank Middle East Limited	10.01	65,294
Historical share capital	**100**	**652,290**
Adjustment to share capital		287,335
Total share capital		**939,625**

	31 December 2017	
Shareholders	**Participation rate (%)**	**TL**
HSBC Middle East Holdings B.V.	89.99	586,996
HSBC Bank Middle East Limited	10.01	65,294
Historical share capital	**100**	**652,290**
Adjustment to share capital		287,335
Total share capital		**939,625**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 23 - RETAINED EARNINGS AND OTHER RESERVES

	31 December 2018	31 December 2017
Legal reserve	197,074	195,034
Revaluation reserve – investment securities	(46,135)	(16,819)
Hedging reserve	2,660	5,071
Actuarial loss related to employee benefits	(28,652)	(31,166)
Total other reserves	**124,947**	**152,120**
Retained earnings	**1,535,090**	**1,736,775**

The hedging reserve comprises the effective portion of the cumulative net change in the fair value of cash flow hedging instruments related to hedged transactions that have not yet occurred.

Movements in other reserves were as follows:

31 December 2018	Legal reserves	Revaluation reserves	Hedging reserves	Actuarial loss related to employee benefits	Total
At 1 January	**195,034**	**(16,819)**	**5,071**	**(31,166)**	**152,120**
Effects of changes in accounting policies	-	(5,846)	-	-	(5,846)
Net change in investments securities, net of tax	-	(23,470)	-	-	(23,470)
Gains on cash flow hedges	-	-	(2,411)	-	(2,411)
Transfer to statutory reserves	2,040	-	-		2,040
Net change in the actuarial loss related to employee benefits	-	-	-	2,514	2,514
At 31 December	**197,074**	**(46,135)**	**2,660**	**(28,652)**	**124,947**

31 December 2017	Legal reserves	Revaluation reserves	Hedging reserves	Actuarial loss related to employee benefits	Total
At 1 January	**203,478**	**(2,317)**	**3,124**	**(25,676)**	**178,609**
Net change in investments securities, net of tax	-	(14,502)	-	-	(14,502)
Losses on cash flow hedges	-	-	1,947	-	1,947
Transfer to statutory reserves	(8,444)	-	-		(8,444)
Net change in the actuarial loss related to employee benefits	-	-	-	(5,490)	(5,490)
At 31 December	**195,034**	**(16,819)**	**5,071**	**(31,166)**	**152,120**

Retained earnings as per the statutory financial statements other than legal reserves are available for distribution, subject to the legal reserve requirement referred to below.

Under the Turkish Commercial Code, the Group is required to create the following legal reserves from appropriation of earnings, which are available for distribution only in the event of liquidation or losses:

a) First legal reserve, appropriated at the rate of 5% of net income, until the total reserve is equal to 20% of issued and fully paid-in share capital.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 23 - RETAINED EARNINGS AND OTHER RESERVES (Continued)

b) Second legal reserve, appropriated at the rate of at least 10% of distribution in excess of 5% of issued and fully paid-in share capital, without limit. It may be used to absorb losses.

After deducting taxes and setting aside the legal reserves as discussed above, the remaining balance of net profit is available for distribution to shareholders. The legal reserves are restricted and are not available for distribution as dividends unless they exceed 50% of the share capital.

NOTE 24 - NET INTEREST INCOME

	31 December 2018	31 December 2017
Interest income on:		
Loans and advances:		
- to banks	587,871	486,338
- to customers	2,284,578	1,573,980
Trading securities	17,406	33,365
Investment securities	83,683	138,483
Reserve Deposits	47,577	24,410
Other	6,477	3,254
Total interest income	**3,027,592**	**2,259,830**
Interest expense on:		
Deposits from customers	1,233,776	622,778
Other borrowed funds	262,645	209,846
Deposits from banks	31,667	18,467
Repurchase agreements	14,050	25,595
Other	12,887	4,208
Total interest expense	**1,555,025**	**880,894**
Net interest income	**1,472,567**	**1,378,936**

NOTE 25 - NET FEE AND COMMISSION INCOME

	31 December 2018	31 December 2017
Fee and commission income on:		
Credit Card Transactions	242,082	232,427
Insurance Commissions	44,814	38,209
Banking Transactions	38,902	30,734
Tefas Fund Platform	33,509	22,818
Non-cash loans	36,969	21,053
Other	84,106	83,088
Total fee and commission income	**480,382**	**428,329**
Fee and commission expense on:		
Non-cash loans	696	925
Other	40,640	40,587
Total fee and commission expense	**41,336**	**41,512**
Net fee and commission income	**439,046**	**386,817**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 26 - NET TRADING INCOME

	31 December 2018	31 December 2017
Derivative financial instruments	2,014,624	210,395
Foreign exchange gains and losses, net	(2,413,095)	(748,276)
Gain from capital market transactions	7,311	27,606
Total	**(391,160)**	**(510,275)**

NOTE 27 - OPERATING EXPENSES

	31 December 2018	31 December 2017
Wages and salaries	261,558	274,213
Discretionary bonuses	63,852	37,474
Social security costs	39,660	42,099
Post-retirement health care costs	13,647	13,872
Pension costs	228	6,218
Other	80,793	84,983
Personnel expenses	**459,738**	**458,859**
Depreciation on property and equipment (Note 13)	22,852	23,887
Amortisation of intangible assets (Note 12)	21,287	16,330
Depreciation and amortisation	**44,139**	**40,222**
Operational Lease Expenses	72,652	98,199
Maintenance Licensing Expenses	46,180	36,518
Maintenance Expenses	24,092	36,395
Communication Expenses	17,439	22,579
Advertisement Expenses	20,485	16,031
Loss on Sales of Assets	8,712	19,725
Tax, Duties, Charges and Funds Expenses	54,731	34,388
Saving Deposit Insurance Fund Expenses	32,075	30,825
Audit & consultancy fees	6,718	6,718
Arbitration committee expenses	18,524	18,524
Other	268,341	237,983
Other operating expense	**569,949**	**557,885**
Total	**1,073,826**	**1,056,961**

NOTE 28 - NET IMPAIRMENT LOSSES

	31 December 2018	31 December 2017
Impairment losses on financial assets	(403,492)	(76,469)
Total	**(403,492)**	**(76,469)**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 29 - COMMITMENTS AND CONTINGENT LIABILITIES

In the normal course of its activities, the Group undertakes various commitments and incurs certain contingent liabilities. The following is a summary of significant commitments and contingent liabilities at 31 December 2018.

Legal proceedings

Due to the nature of its business, the Group is involved in a number of claims and legal proceedings, which arose in the ordinary course of business. The Group recognises provisions for such matters when, based on the opinion of management and its professional advisors, it is probable that a payment will be made by the Group, and when the amount can be reasonably estimated. As of 31 December 2018, lawsuits filed against the Bank is amounting to TL 35,687 (31 December 2017: TL 33,077). A total provision of TL 32,467 (31 December 2017: TL 29,641) is booked for lawsuits with probability of resulting against the Group is higher than the probability of resulting in favour, where TL 1,284 (31 December 2017: TL 2,070) for refunds related to case document charges.

In respect to the further claims asserted against the Group, which according to the principles outlined above, have not been provided for, it is the opinion of management and its professional advisors that such claims are without merit, can be successfully defended or will not have a material adverse effect on the Group's financial position.

Credit related commitments

The primary purpose of these instruments is to ensure that funds are available to customers as, and if required. Guarantees and standby letters of credit, which represent irrevocable assurance that the Group will make payments in the event that a customer cannot meet its obligations to third parties, carry the same credit risk as loans.

The total outstanding contractual amount of commitments to extend credit does not necessarily represent future cash requirements, since many of these commitments will expire or terminate without having been funded.

The outstanding credit related commitments of the Group are as follows

	31 December 2018	**31 December 2017**
Letter of guarantees	1,843,634	1,589,760
Letter of credits	1,256,433	698,997
Acceptance credits	203,137	155,184
Other commitments (*)	354,958	353,187
	3,658,162	**2,797,128**
Current	3,004,580	1,643,301
Non-current	653,582	1,153,827

(*) Other commitments mainly consist of the guarantees given to the correspondent counterparties on behalf of customers.

As of 31 December 2018, commitments for unused credit limits for credit cards, overdrafts and cheques amounted to TL 3,828,455 (2017: TL 4,609,098) in total and were non-cancellable by the Group.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 29 - COMMITMENTS AND CONTINGENT LIABILITIES (Continued)

Operating lease commitments

The Group is involved in operating lease arrangements as the lessee. Payments made under operating leases are recognized in profit or loss on a straight-line basis over the term of the lease.

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

	31 December 2018	31 December 2017
Commitments due within one year	16,339	20,129
Commitments due in period from 1 to 4 years	7,169	1,495
Commitments due after 4 years	330	749
	23,838	**22,373**

NOTE 30 - SEGMENT ANALYSIS

Following management's approach of IFRS 8, operating segments are reported in accordance with the internal reporting provided to the Board of Directors of the Bank. The main segments are retail banking, wholesale banking, and treasury & capital markets.

In retail banking segment, the Bank provides debit cards, credit cards, deposits, consumer loans, payments and collection, premier customer services, custodian services, financial planning and insurance products services. In the wholesale banking segment, the Bank provides loans, commercial cards, foreign trade financing, structured trade financing, project and export financing, syndications, custodian services, and cash and risk management services. In treasury & capital markets banking segment, the Bank provides marketable securities transactions, gold and foreign exchange transactions, derivative transactions and money market transactions services to its customers. There were no changes in the basis of segmentation or in the basis of measurement of segment profit or loss.

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 30 - SEGMENT ANALYSIS (Continued)

The analysis is as follows:

31 December 2018	Retail Banking	Wholesale Banking	Treasury & Capital Markets Banking	Other Operations	Total
Segment revenue	585,178	675,455	353,188	-	1,613,821
Segment expenses	(521,233)	(802,997)	(151,977)	(1,233)	(1,477,440)
Profit/loss before tax	**63,945**	**(127,542)**	**201,211**	**(1,233)**	**136,381**
Income tax expense	-	-	-	(43,336)	(43,336)
Profit/loss for the year	**63,945**	**(127,542)**	**201,211**	**(44,569)**	**93,045**
Total segment assets	**3,958,667**	**7,960,436**	**20,153,193**	**214**	**32,072,510**
Segment liabilities	16,392,499	7,680,750	3,693,182	1,706,417	29,472,848
Shareholder's Equity	-	-	-	2,599,662	2,599,662
Total liabilities	**16,392,499**	**7,680,750**	**3,693,182**	**4,306,079**	**32,072,510**

31 December 2017	Retail Banking	Wholesale Banking	Treasury & Capital Markets Banking	Other Operations	Total
Segment revenue	597,894	452,523	279,965	(15,553)	1,314,829
Segment expenses	(678,254)	(282,609)	(94,688)	(77,879)	(1,133,430)
Profit before tax	**(80,360)**	**169,914**	**185,277**	**(93,432)**	**181,399**
Income tax expense	-	-	-	187,735	187,735
Profit for the year	**(80,360)**	**169,914**	**185,277**	**94,303**	**369,134**
Total segment assets	**4,624,892**	**14,336,433**	**5,481,979**	**2,144**	**24,445,448**
Segment liabilities	12,816,377	7,196,489	428,842	1,175,220	21,616,928
Shareholder's Equity	-	-	-	2,828,520	2,828,520
Total liabilities	**12,816,377**	**7,196,489**	**428,842**	**4,003,740**	**24,445,448**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 31 - RELATED PARTY TRANSACTIONS

During the course of the business, the Group has made placements with and granted loans to related parties and also received deposits from them at various terms. A number of transactions were entered into with related parties in the normal course of business.

(i) Balances with related parties:

	31 December 2018		31 December 2017	
	The Parent	Other related parties	The Parent	Other related parties
Loans and advances to banks	8,272,340	31,205	1,686,950	8,043
Derivative financial instruments	219,266	-	291,487	20
Hedging derivatives	-	-	-	-
Total assets	**8,491,606**	**31,205**	**1,978,437**	**8,063**
Deposits from customers and banks	123,963	44,358	33,465	100,629
Other borrowed funds	259,719	2,436,668	226,254	3,436,236
Derivative financial instruments	383,665	-	364,796	18,869
Hedging derivatives	-	-	-	-
Total liabilities	**767,347**	**2,481,026**	**624,515**	**3,555,734**
Derivative contracts (notional amounts)	18,378,500	482,241	57,987,784	824,622
Credit related commitments	130,236	633,355	102,988	457,562
Total commitments and contingent liabilities	**18,508,736**	**1,115,596**	**58,090,772**	**1,282,184**

(ii) Transactions with related parties:

	31 December 2018		31 December 2017	
	The Parent	Other related parties	The Parent	Other related parties
Interest income	73,711	337	2,184	156
Interest expense on borrowings	(80,196)	(258,068)	(20,728)	(72,365)
Net interest expense	**(6,485)**	**(257,731)**	**(18,544)**	**(72,209)**
Net trading gain/(loss)	**1,1871,060**	**-**	**(450,373)**	**-**

(Amounts expressed in thousands of TL unless otherwise indicated.)

NOTE 31 - RELATED PARTY TRANSACTIONS (Continued)

(iii) Balances with directors and other key management personnel:

	31 December 2018	**31 December 2017**
Deposits from customers	13,244	11,837
Interest expense on deposits from customers	407	359

Salaries and other benefits paid to the Group's key management amount to TL 28,971 as of 31 December 2018 (2017: TL 27,528).

NOTE 32 - ASSETS UNDER MANAGEMENT

At 31 December 2018, the Group manages 13 (2017: 13) mutual funds and 34 pension funds (2017: 19) which were established under Capital Markets Board Regulations. At 31 December 2018, the Funds' investment portfolio mainly includes government bonds, treasury bills and share certificates amounting to TL 9,635,402 (2017: TL 4,480,449). In accordance with the Funds' statute, the Group purchases and sells marketable securities for the Funds, markets their participation certificates and provides other services and charges yearly management fees ranging from 0.35% to 2.50%. At 31 December 2018, management fees earned by the Group amounted to TL 18,553 (2017: TL 17,227).

NOTE 33 - SUBSEQUENT EVENTS

None.

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