

MKB Bank Nyrt.

*Separate Financial Statements
and
Independent Auditor's Report*

December 31, 2020.

INDEPENDENT AUDITOR'S REPORT

To the Shareholders of MKB Bank Nyrt.

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of MKB Bank Nyrt. (the „Company”) for the year 2020 which comprise the statement of financial position as at December 31, 2020 – which shows a total assets of mn HUF 2,792,636 –, and the related statement of recognized income, statement of comprehensive income – which shows a net profit for the year of mn HUF 6,232–, statement of changes in equity and statement of cash flows for the year then ended and notes to the financial statements including a summary of significant accounting policies.

In our opinion, the accompanying financial statements give a true and fair view of the financial position of the Company as at December 31, 2020 and of its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards as adopted by the European Union (the „EU IFRS”), and the financial statements were prepared in all material respects in accordance with the provisions of the effective Hungarian Act C of 2000 on Accounting (the „Accounting Act”) relevant to the entities preparing financial statements in accordance with EU IFRS.

Basis for Opinion

We conducted our audit in accordance with the Hungarian National Standards on Auditing and the effective Hungarian laws and other regulations on audits. Our responsibilities under these standards are further described in the "*The Auditor's Responsibilities for the Audit of the Financial Statements*" section of our report.

We are independent of the Company in compliance with the relevant effective Hungarian regulations and the “Rules of conduct (ethical rules) of the auditor profession and the disciplinary process” of the Chamber of Hungarian Auditors and, in respect of matters not regulated therein, the Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (the IESBA Code), and we have fulfilled our other ethical responsibilities in accordance with the same ethical requirements.

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

Key Audit Matters

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

Key audit matter	Related audit procedures
<i>Impairment of the loan receivables</i>	
<p>(See Section 11. of the Notes to the Financial Statements for the details)</p> <p>The net value of loans to customers in an amount of HUF 1,106,242 million comprise 39.6% of the total assets (gross book value of HUF 1,144,720 million of loans measured at amortized cost), and the relevant impairment balance at the end of the current year was HUF 39,416 million.</p> <p>The determination of impairment of loans requires application of professional judgement and use of subjective assumptions by management. The most significant assumptions applied in the provisioning calculation are the followings:</p> <ul style="list-style-type: none"> - actual model parameters - valuation of collaterals; - estimated time to realize the collaterals; - estimates of future cash-flows expected to be realized. <p>The COVID-19 pandemic has resulted in an increase in the uncertainty of assumptions underlying the economic outlook. This combined with varying government responses, has raised the complexity of assessing and monitoring customers' financial health, necessitating an elevated level of judgement required by the Bank in calculating the ECL.</p> <p>Based on the significance of the above described circumstances the calculation of impairment of loans was identified as a key audit matter.</p>	<p>The relevant audit procedures performed by us included the following:</p> <ul style="list-style-type: none"> - evaluating internal controls relating to monitoring of loans and calculating and recording of impairment; - evaluating specific loan impairments by selecting a random sample based on risk profiles, and for the individually impaired loans the review of consideration and valuation of collaterals and estimates of expected future cash-flows; - evaluating the appropriateness of collective provisioning models, and review of the assumptions, management estimates and parameters applied, including comparison with historical data, and recalculation of the impairment charge with the involvement of our experts; - reviewing subsequent events (sold receivables), and analysing of the possible effect on the year audited; - evaluating the impairment triggers related to the non-impaired portfolio. - assessing the requirement for additional allowances considering the Bank's ECL model, particularly in light of the extraordinary volatility in economic scenarios caused by the current COVID-19 pandemic and government responses.

Other Information: The Business Report and the Corporate Governance Report

Other information comprises the information included in the Corporate Governance Report and the business report of the Company for 2020, but does not include the financial statements and our auditor's report thereon. Management is responsible for the other information and for the preparation of the business report in accordance with the relevant provisions of the Accounting Act and other regulations. Our opinion on the financial statements provided in the section of our independent auditor's report entitled "*Opinion*" does not apply to the other information.

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

Furthermore, in accordance with the Accounting Act, our responsibilities regarding the business report also include reviewing the business report to assess whether the business report was prepared in accordance with the relevant provisions of the Accounting Act and other regulations, if any, including the assessment whether the business report complies with the requirements of Section 95/B. (2) e) and f) of the Accounting Act, and to express an opinion on the above and on whether the business report is consistent with the financial statements. Furthermore, in accordance with the Accounting Act we shall make a statement whether the information referred to in Section 95/B. (2) a)-d), g) and h) has been provided in the business report.

In our opinion, the business report of the Company for 2020 corresponds to the financial statements of the Company for 2020 and the relevant provisions of the Accounting Act in all material respects. The information referred to in Section 95/B. (2) a)-d), g) and h) of the Accounting Act has been provided.

As the Company is not subject to additional requirements under any other regulation in connection with the business report, we have not formulated an opinion on this matter.

In addition to the above, based on the information obtained about the Company and its environment, we must report on whether we became aware of any material misstatements in the other information and, if so, on the nature of such material misstatements. We have nothing to report in this regard.

Responsibilities of Management and Those Charged with Governance for the Financial Statements

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

In preparing the financial statements, management is responsible for assessing the Company'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 Company or to cease operations, or has no realistic alternative but to do so.

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

The Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives during the audit are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue, on the basis of the above, 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 the Hungarian National Standards on Auditing and the effective Hungarian laws and other regulations on audits will always detect a material misstatement when it exists. Misstatements can arise from fraud or error, and they 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 financial statements.

As part of an audit in accordance with the Hungarian National Standards on Auditing and the effective Hungarian laws and other regulations on audits, we exercise professional judgment and maintain professional scepticism throughout the audit.

We also:

- Identify and assess the risks of material misstatement of the 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 Company'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 Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in the auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify the 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 Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

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 the Company's internal control that we identify during the audit.

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

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

Report on Other Legal and Regulatory Requirements

In compliance with Article 10 (2) of Regulation (EU) No. 537/2014 of the European Parliament and the Council, we provide the following information in our independent auditor's report, which is required in addition to the requirements of International Standards on Auditing:

Appointment of the Auditor and the Period of Engagement

We were appointed as the auditors of the Company by the General Meeting of Shareholders on 17 April 2020 and our uninterrupted engagement has lasted for 9 years.

Consistence with the Additional Report to the Audit Committee

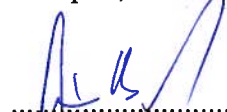
We confirm that our audit opinion on the financial statements expressed herein is consistent with the additional report to the Audit Committee of the Company, which we issued on 30 March 2021 in accordance with Article 11 of Regulation (EU) No. 537/2014 of the European Parliament and the Council.

Provision of Non-audit Services

We declare that no prohibited non-audit services referred to in Article 5 (1) of Regulation (EU) No. 537/2014 of the European Parliament and the Council were provided by us to the Company. In addition, there are no other non-audit services which were provided by us to the Company and its controlled undertakings and which have not been disclosed in the business report.

The engagement partners on the audit resulting in this independent auditor's report are the signatories of the report.

Budapest, 30 March 2021



.....
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Deloitte Auditing and Consulting Ltd.
1068 Budapest, Dózsa György út 84/C.
Registration number: 000083



.....
Mádi-Szabó Zoltán
Statutory registered auditor
Registration number: 003247



MKB Bank Nyrt.

10 011 922 641 911 401
statistic code

*Separate
Financial
Statements*

Prepared under
International Financial Reporting Standards
as adopted by the EU

Budapest, 30 March 2021

31 December 2020

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MKB Bank Nyrt.
Statement of Financial Position as at 31 December 2020

	Note	31 December 2020	31 December 2019
Assets			
Cash and cash equivalents	7	294 183	55 388
Loans and advances to banks	8	83 558	62 392
Derivative financial assets	9	23 262	18 193
Securities	10	1 174 027	600 894
Loans and advances to customers	11	1 106 242	923 938
Non-current assets held for sale and discontinued operations	38	504	4 075
Other assets	12	15 149	14 256
Current income tax assets		1 418	455
Deferred tax assets	23	6 707	7 718
Investments in subsidiaries, jointly controlled entities and associates	13	48 373	46 708
Intangibles, property and equipment	14	39 213	38 439
Total assets		2 792 636	1 772 456
Liabilities			
Amounts due to other banks	15	574 825	195 683
Deposits and current accounts	16	1 877 454	1 237 260
Derivate financial liabilities	17	35 406	44 263
Other liabilities and provisions	18	54 910	60 983
Issued debt securities	19	2 343	1 331
Subordinated debt	20	44 724	39 381
Total liabilities		2 589 662	1 578 901
Equity			
Share capital	21	100 000	100 000
Reserves	22	102 974	93 555
Total equity		202 974	193 555
Total liabilities and equity		2 792 636	1 772 456

Budapest, 30 March 2021


dr Zsolt Barna
Chairman and Chief Executive Officer


János Nyemcsok
Deputy Chief Executive Officer

MKB Bank Nyrt.
Statement of Profit or Loss and Other Comprehensive Income for the year ended 31 December 2020

	Note	2020	2019
<i>Statement of profit or loss</i>			
Interest and similar to interest income	24	50 895	56 927
Interest expense	25	24 988	19 008
Net interest income		25 907	37 919
Net income from commissions and fees	26	23 731	27 371
Other operating income / (expense), net	27	6 121	11 612
Impairment / (Reversal) and provision for losses	28	7 204	(4 027)
Operating expense	29	41 602	39 590
Profit before taxation		6 953	41 339
Income tax (income) / expense	30	721	(673)
PROFIT FOR THE YEAR		6 232	42 012
<i>Other comprehensive income</i>			
<i>Items that may be reclassified subsequently to profit or loss</i>			
Revaluation on financial assets measured at FVTOCI	10	3 187	(3 281)
Other comprehensive income for the year net of tax		3 187	(3 281)
TOTAL COMPREHENSIVE INCOME FOR THE YEAR		9 419	38 731
Net income available to ordinary shareholders		6 232	42 012
Average number of ordinary shares outstanding (thousands)		100 000	100 000
Earnings per Ordinary Share (in HUF)	32		
Basic		62	420
Diluted		62	420

Budapest, 30 March 2021

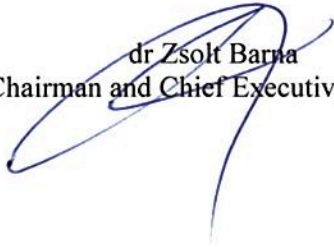

dr Zsolt Barna
Chairman and Chief Executive Officer


János Nyemcsok
Deputy Chief Executive Officer

MKB Bank Nyrt.
Statement of Changes in Equity for the year ended 31 December 2020

	Share capital	Share premium	Retained earnings	Revaluation on financial assets measured at FVTOCI	Total equity
At 1 January 2019	100 000	21 729	41 361	(3 466)	159 624
Dividend	-	-	(4 800)	-	(4 800)
Profit for the year	-	-	42 012	-	42 012
Other comprehensive income for the year	-	-	-	(3 281)	(3 281)
At 31 December 2019	100 000	21 729	78 573	(6 747)	193 555
Profit for the year	-	-	6 232	-	6 232
Other comprehensive income for the year	-	-	-	3 187	3 187
At 31 December 2020	100 000	21 729	84 805	(3 560)	202 974

Budapest, 30 March 2021


dr Zsolt Barna
Chairman and Chief Executive Officer


János Nyemcsok
Deputy Chief Executive Officer

MKB Bank Nyrt.
Statement of changes in equity based on Hungarian Accounting Law for the year ended 31 December 2020

	Share capital	Capital reserve	Retained earnings	Revaluation reserve	Total
Balance at 1 January 2019	100 000	21 729	41 361	(3 466)	159 624
Dividend	-	-	(4 800)	-	-
Profit before tax	-	-	42 012	-	42 012
Accumulated other comprehensive income	-	-	-	(3 281)	(3 281)
Balance at 31 December 2019	100 000	21 729	78 573	(6 747)	193 555
Profit before tax	-	-	6 232	-	6 232
Accumulated other comprehensive income	-	-	-	3 187	3 187
Balance at 31 December 2020	100 000	21 729	84 805	(3 560)	202 974

Reconciliation of share capital registered at registry court and share capital under IFRS as adopted by the EU

	31 December 2020	31 December 2019
Share capital registered at the registry court	100 000	100 000
Instruments recognised as liabilities	-	-
Share capital under IFRS as adopted by the EU	100 000	100 000

Schedule of the profit reserves available for dividend (million HUF)

	31 December 2020	31 December 2019
Retained earnings	84 805	78 573
Statutory other reserve	11 448	10 825
Profit reserve available for dividend	73 357	67 748

The Board of Directors does not propose to the Shareholders of the Bank to pay dividend.

Budapest, 30 March 2021


dr Zsolt Barna
Chairman and Chief Executive Officer


János Nyemcsok
Deputy Chief Executive Officer

MKB Bank Nyrt.
Statement of Cash Flows for the year ended 31 December 2020

	Note	2020	2019
Cash flows from operating activities			
Profit/ (Loss) before taxation		6 953	41 339
<i>Adjustments for:</i>			
Depreciation, amortisation and impairment	14, 31	4 162	4 109
Impairment / (Reversal of impairment) on other assets	12	(29)	1 181
(Reversal of provisions for) / Recognise provisions on off-B/S items and settlement for customers	18, 33	480	(511)
Reversal of impairment on loans and advances	8, 11	(782)	(23 652)
Reversal of impairment on non-current assets held for sale	38	(6 371)	(194)
Impairment / (Reversal of impairment) on securities and associates	10, 13	19	(1 608)
Other IFRS adjustment on securities	10	2 716	(483)
Deferred tax movement	30	1 011	(1 947)
Net interest income	24, 25	(24 807)	(37 634)
Dividends from shares and other non-fixed income securities		(223)	(167)
Revaluation of issued securities	19, 20	-	(92)
Revaluation and other result on securities measured at FVTOCI	Change in Equity	3 187	(3 281)
Foreign Exchange movement		1 279	977
Cash flows from operating activities		(12 405)	(21 963)
Change in loans and advances to banks	8	(21 186)	1 213
Change in loans and advances to customers	11, 34, 35, 37	(181 502)	(7 137)
Change in derivative assets	9	(5 069)	(279)
Change in other assets	12	(864)	1 081
Change in amounts due to banks (short term)	15	4 444	(32 017)
Change in current and deposit accounts	16	640 194	(143 578)
Change in other liabilities and provisions (without provision charge of the year)	18, 31	(6 553)	22 786
Change in derivative liabilities	17	(8 857)	12 655
Interest received	24	50 468	58 207
Interest paid	25	(25 661)	(20 573)
Income tax	30	(1 684)	218
		443 730	(107 424)
Net cash (used in)/ generated operating activities		431 325	(129 387)
Cash flow from investing activities			
Increase of reserves of group companies	13	(2 696)	(2 212)
Disposals of group companies	13	1 098	103
Purchase and disposals of PPEs and intangible assets	14, 31	(4 936)	(20 355)
Purchase of securities	10	(1 048 714)	(750 421)
Disposals of securities	10	473 002	923 187
Change in non-current assets held for sale and discontinued operations	38	9 942	357
Net cash (used in)/ generated by investing activities		(572 304)	150 659
Cash flow from financing activities			
Increase in issued securities	19	2 343	1 116
Decrease in issued securities	19	(1 331)	(5 389)
Increase in subordinated liabilities	20	19 248	10 524
Decrease in subordinated liabilities	20	(15 012)	-
Change in amounts due to banks (Borrowings)	15	374 698	13 547
Dividends paid	Change in equity	-	(4 800)
Net cash generated by financing activities		379 946	14 998
Net increase of cash and cash equivalents		238 967	36 270
Cash reserves at 1 January		55 388	19 240
FX change on cash reserve		(172)	(122)
Cash reserves at the end of period		294 183	55 388

Budapest, 30 March 2021


dr Zsolt Barna
Chairman and Chief Executive Officer


János Nyemcsok
Deputy Chief Executive Officer

Notes to the Separate Financial Statements

(from page 9 to page 107)

1. General information

MKB Bank Nyrt. (former MKB Bank Zrt., hereinafter: “MKB” or “MKB Bank” or “the Bank”) is a commercial bank registered in Hungary, and operating under the effective laws of Hungary, particularly under Act CCXXXVII of 2013 on credit institutions and financial enterprises.

The separate financial statements of the Bank are prepared for the year ended 31 December 2020.

From 30 May 2019 MKB pursues its activity as a public limited company, the shares of MKB Bank were added to the product list of the Budapest Stock Exchange (hereinafter: BSE), by which the shares of MKB were admitted to the BSE. On 30 May 2019 the type of operation of the Bank changed and as of that date it functions as a public limited company. The company name changed to MKB Bank Nyrt., effective from 30 May 2019. The change of form of operation and the related name change were registered by the court of registration on 30 May 2019. The first trading day of the ordinary shares of MKB Bank admitted to BSE was 17 June 2019 in the Standard category of the equity section of BSE.

On 30 October 2020, the Bank has sold all of its shares representing 33.33% ownership in Magyar Bankholding Zrt. to its shareholders.

Magyar Bankholding Zrt. commenced its effective operation as a holding company on 15 December 2020, after the bank shares of the key owners of Budapest Bank Zrt., MKB Bank Nyrt. and MTB Zrt. were transferred to the joint holding company in possession of the approval of National Bank of Hungary (hereinafter: NBH). The owners transferred their shares to Magyar Bankholding Zrt. as a result the second largest banking group in Hungary has been established, with the Hungarian State owning 30.35% of the shares through Corvinus Nemzetközi Befektetési Zrt., the previous direct owners of MKB acquiring 31.96% of the shares and the previous direct owners of MTB acquiring 37.69% of the shares. All required approval has been obtained for these changes. No significant change is expected in the strategy of the Bank.

Following the contribution, the financial holding company will perform strategic decision-making, prudential control and group management functions over the three banking groups, as well as plan and manage the merger process that optimises the operation of the banks. The detailed merger plan and the business strategy will be established in 2021. Budapest Bank, MKB Bank and MTB will preserve their individual legal status, and will operate as separate brands until the merger. After the contribution in kind the synergistic of the intercompany transactions will be immediately utilize.

The shareholder structure of MKB Bank is the following as of 31 December 2020:

1.1

Name of the shareholders of MKB Bank Nyrt.	Number of shares (pieces)	Total face value of shares (HUF)	Ownership share (%)
Magyar Bankholding Zrt.	97 185 008	97 185 008 000	97.19%

Free float ratio: 2.81%

Magyar Bankholding Zrt. has a 97.19% direct ownership interest in MKB Bank. The ownership structure of Magyar Bankholding Zrt. is:

1.2

Name of the shareholders of Magyar Bankholding Zrt.	
Name of the shareholder	Ownership share (%)
Corvinus Nemzetközi Befektetési Zrt.	30.35%
METIS Magántőkealap	11.51%
Blue Robin Investments S.C.A.	10.82%
RKOFIN Befektetési és Vagyonkezelő Kft.	4.48%
EIRENE Magántőkealap	3.29%
Pantherinae Pénzügyi Zrt.	1.02%
PRIME FINANCE Future Zrt.	0.84%
Magyar Takarékné Befektetési és Vagyongazdálkodási Zrt.	37.69%

These financial statements are prepared for general purposes as defined in IAS 1; they are prepared for the purposes of users who may not request the MKB group to prepare customised reports to suit their specific information needs. Any specific information needs beyond these financial statements may be satisfied with the stock exchange flash report which is prepared for special purposes for the same period based on the key figures of these financial statements.

2. Compliance with International Financial Reporting Standards

The financial statements of the Bank have been prepared in accordance with International Financial Reporting Standards (hereinafter: “IFRSs”) as adopted by the EU.

IFRSs comprise accounting standards issued by the International Accounting Standards Board (hereinafter: “IASB”) and its predecessor body and interpretations issued by the International Financial Reporting Interpretations Committee (hereinafter: “IFRIC”) and its predecessor body.

These financial statements are presented in Hungarian Forint (“HUF”), rounded to the nearest million, except if indicated otherwise. The financial statements are authorised for issue by the Board of Directors on 30 March 2021.

Since 1 January 2018, MKB has been applying the IFRSs adopted by the EU in its bookkeeping as well as the preparation of its separate financial statements.

The 2020 figures in these financial statements have been compiled on the basis of the standards effective from 1 January 2020.

3. Basis of measurement

The separate financial statements have been prepared on initial recognition at fair value as inceptive carrying amount.

The Bank classifies subsequent measurements into the following categories:

- derivative financial instruments are measured at fair value
- financial instruments at fair value through profit or loss are measured at fair value (hereinafter: “FVTPL”)
- financial assets measured at fair value through other comprehensive income (hereinafter: “FVTOCI”)
- other financial instruments are measured at amortised cost (hereinafter: “AC”).

The separate financial statements have been prepared based on going concern assumption.

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

Estimates and underlying assumptions are reviewed on an on-going basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised and in any future periods affected.

In particular, information about significant areas of estimation uncertainty and critical judgements in applying accounting policies that have the most significant effect on the amount recognised in the financial statements are described in Note 34.

4. Summary of significant accounting policies

Accounting policies are the specific principles, bases, conventions, rules and practices adopted by the Bank in preparing and presenting the separate financial statements. The accounting policies set out below have been applied consistently to all periods presented in these separate financial statements.

To ensure data consistency the Bank made reclassification in supplementary notes in some relevant cases.

a) Financial statement presentation

These separate financial statements include the accounts of MKB Bank Nyrt. The presentation and functional currency of the Bank was determined as Hungarian Forint (“HUF”).

b) Investments in subsidiaries, jointly controlled entities and associates

Investments in subsidiaries, jointly controlled entities and associates are measured at amortised cost by the Bank.

Subsidiaries are entities controlled by the MKB Bank. Control exists when the Bank is exposed, or has rights, to variable returns from its involvement with the subsidiary and has the ability to affect those returns through its power over the subsidiary. In assessing control, substantive potential voting rights are also taken into account.

Where the Bank is a party to a contractual arrangement whereby, the parties that have joint control of the arrangement have rights to the net assets of the arrangement, the Bank classifies its interest in the venture as a joint venture.

MKB classifies investments in entities over which it has significant influence, and that are neither subsidiaries nor joint ventures, as associates. For the purpose of determining this classification, control is considered to be the power to govern the financial and operating policies of an entity so as to obtain benefits from its activities.

c) Intangible assets

Intangible assets are identifiable non-monetary assets without physical substance held for supply of services, or for administration purposes.

Intangible assets that have a finite useful life are measured initially at costs and subsequently carried at costs less any accumulated amortisation and any accumulated impairment losses. Intangible assets are amortised over their estimated useful lives not exceeding 15 years from the date when the asset is available for use, applying the straight-line method.

Intangible assets that have an indefinite useful life, or are not yet ready for use, are tested for impairment annually. An intangible asset is subject to an impairment review if there are events or changes in circumstances which indicate that the carrying amount may not be recoverable.

Expenditure on internally developed intangible asset (software) is recognised as an asset when the Bank 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.

Subsequent expenditure related 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.

d) Property, plant and equipment

Items of property and equipment including leasehold improvements and investment properties are measured initially at cost, including transaction cost, then subsequently cost less accumulated depreciation and impairment losses.

Cost includes expenditures that are directly attributable to the acquisition of the asset. When parts of an item of property or equipment have different useful lives, they are accounted for as separate items (major components) of property and equipment.

When parts of an item of property or equipment have different useful lives, they are accounted for as separate items (major components) of property and equipment.

The estimated useful lives of property, plant and equipment are as follows:

- components of freehold buildings are depreciated over maximum 100 years,
- equipment, fixtures and fittings (including equipment on operating leases where MKB is the lessor) are depreciated over 5-10 years, but maximum over 20 years.

Depreciation of property, plant and equipment are included in “Operating expense” line in Statement of Profit or Loss and Other Comprehensive Income.

Property, plant and equipment is subject to an impairment review if there are events or changes in circumstances which indicate that the carrying amount may not be recoverable.

Net gains and losses on disposal of property and equipment are recognised in “Other operating income / (expense), net”, in the year of disposal.

e) Investment property

Investment properties are held by the Bank to earn rentals and for capital appreciation.

The Bank uses the cost model for investment property, according to which the property is accounted in the Bank's books at the purchases cost and then depreciated.

The estimated useful lives of investment properties are as follows:

- components of buildings are depreciated over 25-100 years
- connecting equipment are depreciated over 20 years

Depreciation of investment property is included in „Other operating income / (expense), net” line in Statement of Profit or Loss and Other Comprehensive Income.

The fair value of the investment properties shall be supervised yearly by an independent appraiser. Should the fair value be much lower than the carrying amount, impairment loss shall be recognized through profit or losses.

f) Cash and cash equivalents

Cash and cash equivalents include notes and coins on hand, unrestricted balances held with central bank and highly liquid financial assets with original maturities of less than three months, which are subject to insignificant risk of changes in their fair value, and are used by the Bank in the management of its short-term commitments.

Cash and cash equivalents are carried at amortised cost in the statement of financial position.

g) Initial recognition and measurement of Financial Instruments

Outbound loans and claims, and debt securities are recognized by the Bank on settlement date. All other debt securities are recognized when the Bank commits itself either acquiring the asset, or selling it (trade date accounting).

All financial instruments measured at fair value at initial recognition. The fair value of a financial instrument at initial recognition is normally the transaction price (the fair value of the consideration given or received).

At initial recognition, all financial instruments that were measured at amortised cost, are recognized at a modified fair value by the Bank. The modified fair value includes all transaction costs which are directly attributable to the issuance and acquisition of financial instruments.

Financial instruments measured at fair value through profit or loss are recognized at their fair value by the Bank. All related transaction costs incurred at their inception, issuance, and / or purchase are accounted as expense through Profit or Loss. If accounts payables do not contain significant financing component, they are recognized at transaction price by the Bank.

The Bank's financial assets are measured at amortised cost if it is consistent with the business model and meet the criteria of the SPPI test.

Amortised cost is the amount of a financial asset or financial liability at initial recognition, reduced by principal repayments, increased or decreased by the difference between the original amount and amount at maturity cumulative amortization calculated using an effective interest rate method and in case of financial assets adjusted by any loss allowance.

The effective interest rate is the rate that exactly discounts the estimated future cash payments or receipts through the expected life of the financial asset or financial liability to the

- gross carrying amount of the financial asset, or
- amortised cost of the financial liability.

However, in those cases when it is not possible to reliably estimate the cash flows or the remaining life of a financial instrument (or group of financial instruments), the Bank uses the contractual cash flows over the full contractual term of the financial instrument (or group of financial instruments).

In case of purchased or originated credit-impaired financial assets (POCI) credit-adjusted effective interest rate should be used. The credit adjusted effective interest rate (CAEIR) is the rate that exactly discounts the estimated expected future cash payments or receipts through the expected life of the financial asset to the amortised cost of a financial asset.

The effective interest rate method is the method used to measure the amortised cost of the Bank's financial assets or financial liabilities and the method used to allocate and recognises interest income and interest expense in a given period.

Interest income and interest expense should be determined using the effective interest rate method and then recognized in the Profit or Loss statement.

Simplified approach for trade receivables, contract assets and lease receivables

In case of future cash flows of financial instruments cannot be estimated reliably due to the specific features of the product, furthermore the contractual cash flows are not available, the effective interest rate of the instrument cannot be determined.

When interests, commissions and other items arise related to such transactions these are accounted through profit or loss for using a simplified method (ie the effective interest rate is the same as the nominal interest rate).

h) Classification and subsequent measurement of Financial Instruments

IFRS 9 standard contains three main categories to classify and measure the financial assets: amortised cost (AC), fair value through other comprehensive income (FVTOCI) and fair value through Profit and Loss (FVTPL).

The Bank's business model is determined at a level that reflects how groups of financial assets are managed together to achieve a particular business objective. The business model does not depend on management's intentions for an individual instrument. Accordingly, this condition is not an instrument-by-instrument approach to classification and should be determined on a higher level of aggregation. The Bank uses multiple business models to manage its financial instruments.

The following business model categories have been developed in accordance with IFRS 9 standard:

- **Held to Collect (HTC):** an instrument is held for the collection of contractual cash flows with which the Bank aims to realize long-term interest income. There is no requirement to hold to maturity, a sale is permitted due to increased credit risk. Sales could be also consistent with the business model if the credit concentration risks change or if close to maturity.
- **Both Held to Collect and For Sale (HTCS):** an instrument that is held for the collection of contractual cash flows and for the sale of financial assets at the same time. The purpose of the inception or purchase is to collect contractual cash flows, as well as to realize profit from the increase in the fair value and minimize loss from the decrease in the fair value in medium or long term. Compared to the HTC sales occur more frequently and are higher in value.
- **Other trading business model (TRADING):** mainly trading financial instruments that are purchased for short-term gain.

The listing in the business model reflects the expectations of the Bank, not just the intent, but also the ability. The classification is not based on scenarios that are not reasonably expected ('worst case' or 'stress case' scenario). If the Bank sells a particular portfolio or financial asset in a 'stress case' scenario, it does not affect the evaluation of the business model.

Classification not only depends on the business model but also on the cash flow related characteristics associated with the financial instrument. The Bank has to examine the cash flows associated with the financial instrument - regarding those debt instruments that will be measured at amortised cost or fair value through other comprehensive income - whether they comply with the requirements of the principal and interest definitions according to IFRS 9 (SPPI / Cash Flow Test).

By Cash Flow Test the Bank examines whether the contractual cash flows are solely payments of principal and interest on the principal amount outstanding.

Contractual cash flows that are solely payments of principal and interest on the principal amount outstanding are consistent with a basic lending arrangement. In a basic lending arrangement, consideration for the time value of money and credit risk are typically the most significant elements of interest. However, in such an arrangement, interest can also include consideration for other basic lending risks (for example, liquidity risk) and costs (for example, administrative costs) associated with holding the financial asset for a particular period of time. In addition, interest can include a profit margin that is consistent with a basic lending arrangement. However, contractual terms that introduce exposure to risks or volatility in the contractual cash flows that is unrelated to a basic lending arrangement, such as exposure to changes in equity prices or commodity prices, do not give rise to contractual cash flows that are solely payments of principal and interest on the principal amount outstanding. An originated or a purchased financial asset can be a basic lending arrangement irrespective of whether it is a loan in its legal form.

The Bank shall measure a financial asset at amortised cost if both of the following conditions are met:

- the financial asset is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows, and
- the financial asset's contractual cash flows are solely payments of principal and interest.

The Bank shall measure a debt instrument at fair value through other comprehensive income if both of the following conditions are met:

- the financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets, and
- the financial asset's contractual cash flows are solely payments of principal and interest.

The Bank is able to make an irrevocably election to measure the investments in equity instruments, which are not held for trading at "fair value through other comprehensive income" category at initial recognition, in other case these financial assets should be measured at fair value through profit or loss.

All other financial assets are classified by the Bank as the fair value through profit or loss category.

i) Classification and subsequent measurement of financial liabilities

The Bank classifies its financial liabilities into the following categories:

- Mandatory FVTPL measurement (FVTPL category) measurement if liabilities are held for trading,
- FVTPL option – based on the decision of entity at initial recognition (if qualifying criteria are met)
- Amortised cost – other financial liabilities.

Financial liabilities not held for trading are initially measured at fair value less transaction cost by the Bank. These liabilities are subsequently measured at amortised cost calculated by using the effective interest method.

j) Fair Value Option (FVO)

At initial recognition, the Bank may irrevocably recognize a financial asset or liability at fair value through profit or loss if it eliminates or significantly decreases any valuation or recognition inconsistencies that would otherwise have arisen because of the valuation of assets and liabilities or the profits or losses generated on them are shown on different bases.

The financial liabilities are measured at fair value through Profit or Loss at initial recognition by the Bank, the change in fair value at the subsequent measurement should be recognised as the following:

- changes related to own credit risk is measured through other comprehensive income (OCI),
- all other changes in fair value is measured through Profit or Loss.

k) Determination and recognition of the Expected Credit Loss

During classification of the Bank's financial instruments the primary collateral is determined as the ability and intention of the client to pay. Except for those transactions that are covered by collateral which is independent of the financial and legal position of the client accordingly the return can be unequivocally ensured.

The Bank assigns exposures at each reporting period – in this case monthly – during which the exposures are allocated to the segments and to the so-called 'stages' (stage 1, stage 2, stage 3 and / or POCI) in accordance with the principles of IFRS 9 standard.

The Bank assesses at each reporting date whether the credit risk of the financial asset has increased significantly since the initial recognition.

The Bank recognises lifetime expected credit loss for all financial instruments when the credit risk has increased significantly compared to the credit risk at acquisition or origination – regardless whether assessed on an individual or collective basis - considering all reasonable and supportable information, including that which is foreseeable.

When making the assessment, the Bank evaluates the changes in the risk of a default occurring over the expected life of the financial instrument, considering reasonable and supportable information, that is available without undue cost or effort which indicate the changes in credit risk since initial recognition.

The Bank determines the significant increase in credit risk based on the examination of the following four conditions:

- changes in the clients' rating after the issuance,
- PD change in the master scale compared to the initial value,
- default in payment,
- the amount of the client's exposure classified as Stage 2 exceeds a certain proportion of its gross exposure.

The existence of any of these conditions is assessed by the Bank as a significant increase in the credit risk. If there is no evidence of impairment have to be assigned to Stage 2, the transaction could be displaced from stage 2 to stage 1.

Financial assets whose default risk has increased to such an extent after initial recognition that there is objective evidence of impairment have to be assigned to Stage 3 and a loan loss allowance has to be recognised by calculating the Lifetime Expected Credit Loss (ECL). Bank defines materiality threshold, exposure that are below that threshold should be considered as a

small amount (below the limit). The impairment of those assets which are above the threshold should be estimated individually.

In order to determine the impairment and allowance for classes of clients, the expected credit loss (ECL) should be calculated according to the relevant principles of IFRS 9 impairment model for classes of clients calculated on monthly basis, automatically.

Factors taken into account when determining expected credit loss:

- remaining lifetime in years,
- exposure at default (EaD),
- loss given default (LGD),
- probability of default (PD),
- credit conversion-factor (CCF),
- loss rate of the non-default and default transaction,
- discount rate calculated on the remaining lifetime.

The amount of impairment and allowance equals to amount of expected credit loss.

In Stage 1 the impairment is equal to the 12-Month expected credit loss.

In Stage 2 and Stage 3 the impairment is equal to the lifetime expected credit loss.

The applied risk parameters are determined on the basis of statistical models for homogeneous groups and transaction groups. The models are validated at least once a year, and if necessary they will be revised. Transactions that are recognised at fair value, the fair value calculation the credit risk component of the discount factor is calculated based on the principles related to determination of ECL as mentioned above.

The Bank calculates the expected credit loss for the remaining lifetime, except for the following financial instruments for which the loss is calculated for 12 months:

- debt securities with low credit risk at the reporting date,
- financial instruments except for lease receivables and account receivables, which credit risk do not significantly increased compared to initial recognition.

For account and lease receivables the Bank always calculates lifetime expected credit loss.

Expected credit losses are probability-weighted estimates of credit losses during the life expectancy of a financial asset. These are assessed by the Bank as follows:

- financial assets not impaired at the reporting date: discounted loss on cash flow (difference between the contractual cash flows and the expected cash flows),
- financial assets impaired at the reporting date: difference between the gross carrying amount and the estimated present value of the outstanding amount,
- undrawn loan commitments: present value of the difference between the contractual cash flows that are due to the entity if the holder of the loan commitment draws down the loan and the cash flows that the entity expects to receive if the loan is drawn down,
- financial guarantee contracts: expected payments to the holder, reduced by the amounts that are expected to be recovered.

If the credit risk of the financial instrument has increased significantly since its initial recognition until the reporting date, the Bank recognises the loss on the asset at an amount of lifetime expected credit losses.

If the credit risk of the financial instrument has not significantly increased since the initial recognition until the reporting date, the Bank recognizes loss on the asset at the same amount of the 12-month expected credit loss.

The impairment / expected credit loss calculated for 12 months is the part of the lifetime expected loss results from potential default events within 12 months of the reporting date.

The Bank recognises loss for the expected credit loss on the following financial instruments not measured at fair value through Profit or Loss:

- debt instruments,
- lease receivables,
- accounts receivables,
- financial guarantees, and
- loan commitments.

The expected credit loss should be recognised by the Bank as the following:

- deducted amount from the gross carrying value (impairment) – in case of financial assets measured at amortised cost,
- provision – in case of financial guarantees and loan commitments, if the financial instrument includes both a loan and an undrawn components and the Bank is unable to distinguish the expected credit loss calculated for the loan and for the undrawn components, the Bank will therefore determine the impairment loss on the two components together. To the extent that the combined expected credit losses exceed the gross carrying amount of the financial asset, the expected credit losses should be recognised as a provision.
- in case of financial assets measured at fair value through other comprehensive income (OCI), the impairment loss is not recognized in the financial statement as part of the assets' fair value. The recognised impairment modifies the cumulative other comprehensive income.

When recognising the change in the credit risk, the Bank reviews the Stage classification based on the clients' risk characteristics (in all aspect the same, hypothetical, credit risk parameters of a transaction measured at amortised cost are applied) and assigns the corresponding risk parameters to the transaction during the valuation. Accordingly, the risk parameters are part of fair valuation and the change in credit risk occurs by isolating and separately recording the effects of these parameters.

For purchased or originated credit-impaired financial assets at the reporting date the Bank recognises the accumulated changes in the lifetime expected credit loss since the initial recognition. In the Bank's practice, typically forint-denominated receivables appear as purchased or originated credit-impaired financial assets.

The Bank assesses provision for contingent liabilities (i.e. contracted but undrawn loan commitments, issued financial guarantees, letter of credits) as follows:

- in the case of clients / debtors subject to individual valuation, the Bank determines the amount of provision individually,
- in other case the Bank calculates provision based on the EAD corrected by CCF.

For transactions accounted as commitments showing loss on the reporting date, the calculated provision is the negative difference between the fair value and the gross carrying amount based on the valuation method.

Impairment and provision are based on the amount of loss calculated as above.

1) Determination of fair value

All financial instruments are recognised initially at fair value. In the normal course of business, the fair value of a financial instrument on initial recognition is the transaction price (that is, the fair value of the consideration given or received). In certain circumstances, however, the initial fair value will be based on other observable current market transactions in the same instrument, or on a valuation technique whose variables include only data from observable markets, such as interest rate yield curves, option volatilities and currency rates. When such evidence exists, the Bank recognises a trading gain or loss on inception of the financial instrument.

When unavailable market data have a significant impact on the valuation of financial instruments, the entire initial difference in fair value indicated by the valuation model from the transaction price is not recognised immediately in the statement of comprehensive income but is recognised over the life of the transaction on an appropriate basis, or when the inputs become observable, or the transaction matures or is closed out, or when the Bank enters into an offsetting transaction.

Subsequent to initial recognition, the fair values of financial instruments measured at fair value that are quoted in active markets are based on bid prices for assets held and offer prices for liabilities issued. When independent prices are not available, fair values are determined by using valuation techniques which refer to observable market data. These include comparison with similar instruments where market observable prices exist, discounted cash flow analysis, option pricing models and other valuation techniques commonly used by market participants. For financial instruments, fair values may be determined in whole or in part using valuation techniques based on assumptions that are not supported by prices from current market transactions or observable market data.

The inputs used by the valuation techniques for determining fair values are classified by the fair value level hierarchy as follows:

- level 1: quoted market price in an active market for an identical instrument
- level 2: valuation techniques based on observable inputs
- level 3: valuation techniques using significant unobservable inputs

Transfer from level 1 to level 2 of fair value hierarchy may occur when prices on active market are no longer available. This is the case when the active market cease to be exists, or there are no publicly available quotations, however observable inputs are still available for valuation purposes on the instrument under question.

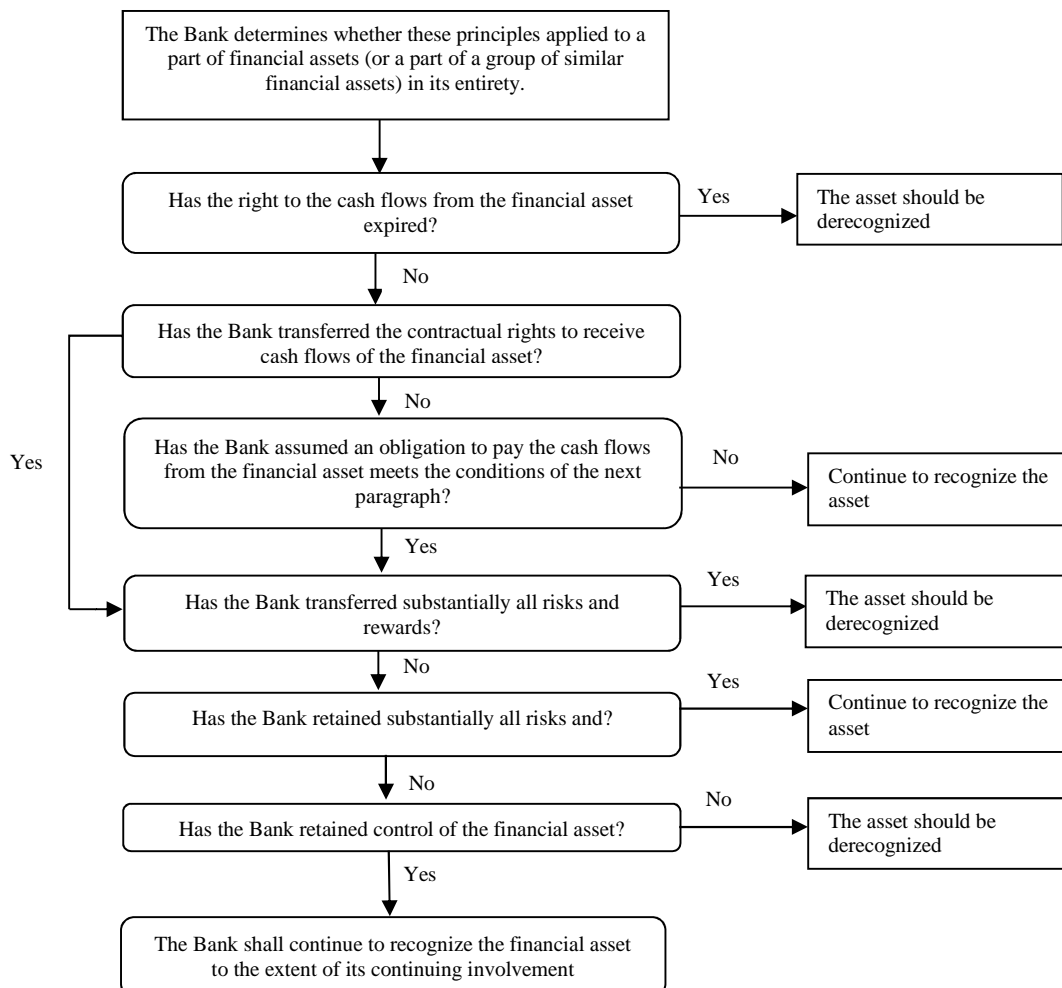
Factors such as bid-offer spread, credit profile and model uncertainty are taken into account, as appropriate, when fair values are calculated using valuation techniques. Valuation techniques incorporate assumptions that other market participants would use in their valuations, including assumptions about interest rate yield curves, exchange rates, volatilities, and prepayment and default rates. Where a portfolio of financial instruments has quoted prices in an active market, the fair value of the instruments are calculated as the product of the number of units and quoted price and no block discounts are made.

If the fair value of a financial asset measured at fair value through profit or loss becomes negative, it is recorded as a financial liability until its fair value becomes positive, at which time it is recorded as a financial asset.

The fair values of financial liabilities are measured using quoted market prices, where available, or using valuation techniques. These fair values include market participants' assessments of the appropriate credit spread to apply to the Bank's liabilities.

m) Derecognition of Financial Assets

The following decision tree illustrates the principles of derecognition of financial instruments by the Bank:



The Bank derecognises a financial asset when transfer the contractual rights to receive the cash flows of a financial asset (the ‘original asset’), or retains the contractual rights to receive the cash flows of a financial asset, but assumes a contractual obligation to pay those cash flows to one or more recipients (the ‘eventual recipients’), the Bank treats the transaction as a transfer of a financial asset if, and only if, all of the following three conditions are met:

- The Bank has no obligation to pay amounts to the eventual recipients unless it collects equivalent amounts from the original asset. Short-term advances by the entity with the right of full recovery of the amount lent plus accrued interest at market rates do not violate this condition.
- The Bank is prohibited by the terms of the transfer contract from selling or pledging the original asset other than as security to the eventual recipients for the obligation to pay them cash flows.
- The Bank has an obligation to remit any cash flows it collects on behalf of the eventual recipients without material delay. In addition, the Bank is not entitled to reinvest such cash flows, except for investments in cash or cash equivalents during the short settlement period from the collection date to the date of required remittance to

the eventual recipients, and interest earned on such investments is passed to the eventual recipients.

When the Bank transfers a financial asset, it shall evaluate the extent to which it retains the risks and rewards of ownership of the financial asset.

The Bank examines the following before derecognition:

- if the Bank transfers substantially all the risks and rewards of ownership of the financial asset, the Bank shall derecognize the financial asset and recognize separately as assets or liabilities any rights and obligations created or retained in the transfer,
- if the Bank retains substantially all the risks and rewards of ownership of the financial asset, the Bank shall continue to recognize the financial asset,
- if the Bank neither transfers nor retains substantially all the risks and rewards of ownership of the financial asset, the Bank shall determine whether it has retained control of the financial asset. In this case:
 - if the Bank has not retained control, it shall derecognize the financial asset and recognize separately as assets or liabilities any rights and obligations created or retained in the transfer,
 - if the Bank has retained control, it shall continue to recognize the financial asset to the extent of its continuing involvement in the financial asset.

The extent of the Bank's continuing involvement in the transferred asset is the extent to which the Bank is exposed to changes in the value of the transferred asset.

The transfer of risks and rewards is evaluated by comparing the Bank's exposure, before and after the transfer, with the variability in the amounts and timing of the net cash flows of the transferred asset. The computation and comparison are made using the current market interest rate as discount rate. All reasonably possible variability in net cash flows is considered, with greater weight being given to those outcomes that are more likely to occur.

The Bank has retained substantially all the risks and rewards of ownership of a financial asset if its exposure to the variability in the present value of the future net cash flows from the financial asset does not change significantly as a result of the transfer.

An entity has transferred substantially all the risks and rewards of ownership of a financial asset if its exposure to such variability is no longer significant in relation to the total variability in the present value of the future net cash flows associated with the financial asset.

Asset transfers holding all or substantially all of the risks and rewards could be for example repo transactions (for repo transactions, the Bank considers whether the risks and rewards incurred in the transaction are substantially transferred or not).

Derecognition due to significant changes in contractual cash flows of financial liabilities

The terms are substantially different if under the new terms the present value discounted at the original effective interest rate of the cash flows – including fees received and paid – is at least 10% different from the discounted present value of the remaining cash flows of the original financial asset. If the exchange of debt instruments or the modification of the terms is treated as derecognition, the Bank will recognize any costs or fees incurred as a gain or loss related to the termination of the asset. If the exchange or modification is not accounted for as derecognition, the costs or fees incurred will modify the carrying amount of the asset and will be amortised over the remaining maturity of the modified loan.

The Bank considers it a significant change if the contractual currency is modified, or if the contractual interest rate is changed from variable to fix, or inversely.

Write-off of financial assets under legal proceeding

Loans which are under legal proceeding (bankruptcy, liquidation and final proceedings) and in case of enforcement collateral transactions:

- the Bank's contractual right to receive cash flows from the financial asset does not expire,
- the Bank did not transfer the right of collecting cash flows from the financial asset,
- the Bank did not assume any obligation to pay the cash flows from the financial asset, therefore the Bank does not derecognize such items entirely from its books, but may partially derecognize them.

When the Bank can reasonably not expect to recover part of the financial asset while maintaining the legal claim it is considered as a partial recognition. In such cases, the write-off reduces gross carrying amount of the financial asset.

After the legal waiver of the claim, the Bank may write down the total gross carrying amount of the financial asset if it is not able to be recovered and void according to the relevant internal rules (in this case there is no legal claim).

n) Derecognition of financial liabilities

The Bank removes a financial liability (or a part of a financial liability) from its statement of financial position when, and only when, it is extinguished – when the obligation specified in the contract is fulfilled or cancelled or expires.

Exchange between an existing borrower and lender of debt instruments with substantially different terms shall be accounted for as an extinguishment of the original financial liability and the recognition of a new financial liability.

Similarly, a substantial modification of the terms of an existing financial liability or a part of it (whether or not attributable to the financial difficulty of the debtor) shall be accounted for as an extinguishment of the original financial liability and the recognition of a new financial liability.

The terms are substantially different if under the new terms the present value discounted at the original effective interest rate of the cash flows – including fees received and paid – is at least 10% different from the discounted present value of the remaining cash flows of the original financial liability. If the exchange of debt instruments or the modification of the terms is treated as cancellation, the Bank will recognize any costs or fees incurred as a gain or loss related to the termination of the liability. If the exchange or modification is not accounted for as cancellation, the costs or fees incurred will modify the current amount of the liability and will be depreciated over the remaining maturity of the modified loan.

o) Financial guarantees

The Bank does not recognise the financial guarantees as contingent items in the Financial Statement because this could cause recognition such income or expense which may not being realisable.

In case when the realisation of income or expense is substantially sure, the asset does not considered as contingent item and it should be recognised in the Financial Statement items assessed permanently in order to the Bank post the changes up the Financial Statement in time.

Insofar the occurrence of economic benefits inflow or outflow being substantially sure, the relating income or expense should be accounted in that period wherein the probability of the occurrence changed.

The Bank considers the occurrence of economic benefits inflow or outflow as substantially sure when the Client written inform the Bank of the intention to draw on guarantee.

The Bank subsequently recognises the contracts on financial guarantee at the higher of the amount of the accounted loss and the amount initially recognised less cumulative income.

p) Non-current assets held for sale and discontinued operations

Financial instruments that meet the IFRS 5 standard criteria's are recognized as held for sale by the Bank. The Bank classifies a non-current asset as held for sale, if its carrying amount will be recovered principally through a sale transaction, rather than through continuing use.

A disposal group is a group of assets that are intended to be disposed by sale or in another way, collectively, as a single group, in a single transaction and the liabilities directly attributable to those assets that are transferred during the transaction.

To meet the criteria for classification as held for sale:

- the asset (or disposal group) must be available for immediate sale in its present condition subject only to terms that are usual and customary for sales of such assets (or disposal groups) and its sale must be highly probable,
- for the sale to be highly probable, the appropriate level of management must be committed to a plan to sell the asset (or disposal group), and an active programme to locate a buyer and complete the plan must have been initiated,
- the plan or decision to sell must be approved in accordance with the relevant rules of the Bank in order for the sale to be considered as highly probable and it is also necessary to include it in the report,
- the asset (or disposal group) must be actively marketed for sale at a price that is reasonable in relation to its current fair value or the Bank advertise it at the appropriate forum,
- the sale should be expected to qualify for recognition as a completed sale within one year from the date of classification,
- actions required to complete the plan should indicate that it is unlikely that significant changes to the plan will be made or that the plan will be withdrawn.

Assets held for sale or disposal groups should be recognized separately in the statement of financial position.

A disposal group classified as held for sale may qualify for the definition of the discontinued operations.

Discontinued operations are a part of the Bank that has been disposed of or classified as held for sale and embody a distinct, major industry or geographical area of activity and are part of a coordinated plan for disposing a separate business or geographical area of activity.

The result of the discontinued operation and the gains or losses at sale should be recognized in a separate line in the Statement of Profit or Loss and Other Comprehensive Income by the Bank.

The Bank measures a non-current asset (or disposal group) classified as held for sale at the lower of its carrying amount or fair value less cost to sell.

If the fair value less cost to sell is less than the carrying amount of the non-current assets or assets or liabilities part of the disposal group at the date of classification as held for sale an impairment loss shall be recognized.

Fair value less cost to sell must be re-determined at each reporting date and, if higher than the carrying amount, the impairment loss should be reversed up to the amount of impairment loss recognized previously.

Please find further details on non-current financial assets and liabilities held for sale in Note 38.

q) Financial assets and liabilities held for trading

Treasury bills, debt securities, equity shares are classified as held for trading if they have been acquired principally for the purpose of selling or repurchasing in the near term. These financial assets or financial liabilities are recognised on trade date, when the Bank enters into contractual arrangements with counterparties to purchase or sell securities, and are normally derecognised when either sold (assets) or extinguished (liabilities). Measurement is initially at fair value, with transaction costs recognized in the Statement of Profit or Loss and Other Comprehensive Income. Subsequently, their fair values are remeasured, and all gains and losses from changes therein should be recognised in the Statement of Profit or Loss and Other Comprehensive Income in “Other operating income / (expense), net” as they arise.

Interest earned on trading debt securities is reported as interest revenue among the interest and similar to interest income when it becomes due. The dividends earned on trading equity instruments are disclosed separately among the interest and similar to interest income when received. Interest payable on financial liabilities acquired for trading purposes is reported as interest expense.

Structured Bonds

MKB issues structured bonds for its retail and institutional clients since 2008. The Bank eliminated its interest and foreign currency risk arising from the above mentioned options by entering into offsetting option transactions. To eliminate valuation inconsistencies, these structured bonds are designated at fair value to profit or loss in their entirety and as a consequence the embedded derivatives are not separated.

The fair value designation, once made, is irrevocable. Designated financial assets and financial liabilities are recognised when the Bank enters into the contractual provisions of the arrangements with counterparties, which is generally on trade date, and are normally derecognised when sold (assets) or extinguished (liabilities). Measurement is initially at fair value, with transaction costs taken directly to the Statement of Profit or Loss and Other

Comprehensive Income. Subsequently, the fair values are remeasured, and gains and losses from changes therein are recognised in “Interest and similar to interest income”.

r) Securities

Investments in securities are classified as asset held for liquidity purposes if there was a decision made previously about possible disposal in case of the changes in market conditions or the securities have not been classified into the other categories. By these assets the objective is to achieve both collecting contractual cash flows and selling financial assets. Financial investments are recognised on trade date, when the Bank enters into contractual arrangements with counterparties to purchase securities, and are derecognised when either the securities are sold or the borrowers repay their obligations.

The liquid securities are initially measured at fair value modified by direct and incremental transaction costs. They are subsequently remeasured at fair value, and changes therein are recognised in other comprehensive income. Relating to these assets impairment loss should be accounted in Statement of Profit or Loss. When these securities are sold, cumulative gains or losses previously recognised in other comprehensive income are recognised in the Statement of Profit or Loss and Other Comprehensive Income as “Other operating income / (expense), net”.

s) Derivatives

Derivatives are recognised initially, and are subsequently remeasured, at fair value. Fair values of exchange-traded derivatives are obtained from quoted market prices. Fair values of over-the-counter derivatives are obtained using valuation techniques, including discounted cash flow models and option pricing models.

Derivatives may be embedded in other financial if host contract is financial asset, then embedded derivative is not separated according to the IFRS 9 standard.

Derivatives are classified as assets when their fair value is positive or as liabilities when their fair value is negative. Derivative assets and liabilities arising from different transactions are only offset if the transactions are with the same counterparty, a legal right of offset exists, and the parties intend to settle the cash flows on a net basis.

t) Leases

In accordance with the requirements of IFRS 16, the Bank, as lessee, introduces a single model to recognise right-of-use asset and lease liability on balance sheet. In this case, the Bank presents separately the interest expense for the lease liability and the depreciation charge for the right-of-use asset. In some cases (e.g when there is a change in the lease term or in future lease payments arising from a change in an index or rate) the Bank as lessee remeasures the lease liability.

At the commencement date, the Bank assesses whether the lessee is reasonably certain to exercise an option to extend or not to exercise an option to terminate the lease. The Bank considers all relevant facts and circumstances that create an economic incentive for the lessee to exercise, or not to exercise, the option.

The Bank recognises the right-of-use asset and the lease liability as at the commencement date of the lease. The right-of-use asset is initially measured at cost, which includes the initial amount of the lease liability, adjusted for lease payments incurred on or before the commencement date, increased initial direct costs and costs for dismantling, removing and restoring the underlying asset and for site restoration and less any leasing incentives.

The Bank, as lessor, classifies its leasing contracts as finance or operating leases based on decision tree according to the requirements of the standard. Initially, the Bank recognises the lease liability at the present value of the lease payments outstanding at the commencement date, discounted at the implicit interest rate of the lease. On subsequent measurement, the Bank recognises depreciation on the right-of-use asset from the commencement date to the end of the useful life of the underlying asset.

After the commencement date of the lease term, the Bank depreciates the asset on a straight-line basis, from the commencement date to the earlier of the useful life or the end of the lease term.

After the commencement date, the Bank measures the lease liability at amortised cost using the effective interest rate method. The Bank uses the revised interest rate at the date of the revaluation as the revised discount rate. In contrast, the Bank reassesses the lease liability by discounting the revised lease payments if future lease payments are changed due to changes in an index or rate.

Presentation in the financial statements

During the lease term, the Bank recognises lease payments for short-term leases and low value leases as an expense in Statement of Profit or Loss and Other Comprehensive Income.

The right-of-use assets are included in “Intangibles, property and equipment” and lease liabilities in “Other liabilities and provisions” in the Statement of Financial Position.

After the commencement date the Bank recognises the related costs in Statement of Profit or Loss and Other Comprehensive Income, if these are not recognised as part of the cost of the right-of-use asset. Interest on lease liabilities is included in “Interest expense”. The depreciation of a right-of-use asset is recognised as “Operating expense”.

The Bank classifies the right-of-use assets arising from operating leases that are leased or subleased in the Statement of Financial Position by reference to the nature of the underlying asset.

u) Deposits, debt securities issued and subordinated liabilities

Deposits, debt securities issued and subordinated liabilities are the Bank’s sources of debt funding.

When the Bank 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 Bank’s financial statements.

Deposits, debt securities issued and subordinated liabilities are initially measured at fair value plus transaction costs, and subsequently measured at their amortised cost using the effective interest method, except for the items which at initial recognition are designated by the Bank to fair value through profit or loss category.

v) Provisions

A provision is recognised if, as a result of a past event, the Bank has a present legal or constructive obligation that can be estimated reliably, and it is probable that an outflow of economic benefits will be required to settle the obligation.

Contingent liabilities, which include certain guarantees, are possible obligations that arise from past events 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 Bank, and present obligation that arises from past events but is not recognised, because it is not probable that an outflow of resources embodying economic benefits will be required to settle the obligation, or the amount of the obligation cannot be measured with sufficient reliability.

Contingent liabilities are not recognised in the financial statements but are disclosed in the additional notes.

w) Income tax

Income tax comprises current tax and deferred tax.

By accounting treatment for current and future income tax, the Bank recognises the tax consequences of the future recovery / settlement of the carrying amount of assets, liabilities, transactions and other events of the current period that are recognised in the statement of financial position.

The Bank applies the corporate income tax as income tax.

Current tax is the tax expected to be payable on the taxable profit for the year, calculated using tax rates enacted or substantively enacted by the end of the reporting period, and any adjustment to tax payable in respect of previous years.

Deferred tax is measured at tax rates that are expected to be applied to the temporary differences when they reverse, based on laws that have been enacted or substantively enacted by the end of the reporting period.

Deferred tax is provided using the financial position method, providing for temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes.

Deferred tax is not recognised for the following temporary differences:

- the initial recognition of goodwill,
- the initial recognition of assets or liabilities in a transaction that is not a business combination and that affects neither accounting nor taxable profit, and
- differences relating to investments in subsidiaries to the extent that they probably will not reverse in the foreseeable future.

Deferred tax asset is recognised only to the extent that it is probable that future taxable profits will be available against which the asset can be utilised. Deferred tax assets are reviewed at the end of each reporting period and are reduced to the extent that it is no longer probable that the related tax benefit will be realised.

Deferred tax assets and liabilities are offset when they arise in the same entity and relate to income taxes levied by the same taxation authority, and when a legal right to offset exists in the entity.

Deferred tax relating to fair value re-measurement of financial assets measured at fair value through other comprehensive income, which are charged or credited directly to equity, is also credited or charged directly to equity.

x) Interest and similar to interest income and expense

Interest income and expense typically relating to use the effective interest method is recognised in “Interest and similar to interest income” and “Interest expense” in the Statement of Profit or Loss and Other Comprehensive Income.

y) Net income from commissions and fees

Fee and commission income is accounted for as follows:

- income earned on the execution of a significant act is recognised as revenue when the act is completed (for example the arrangement for the acquisition of shares or other securities) and
- income earned from the provision of services is recognised as revenue as the services are provided (for example asset management and service fees).

z) Other operating income / (expense), net

“Other operating income / (expense), net” comprises gains less losses related to trading and investment assets and liabilities, and includes all realised and unrealised fair value changes and foreign exchange differences.

aa) Dividends

Dividend income is recognised when the right to receive income is established. Usually this is the ex-dividend date for equity securities.

bb) Segment reporting

MKB formed its reporting segments in line with IFRS 8 “Operating Segments”. An operating segment is a component of the Bank that engages in business activities from which it may earn revenues and incur expenses, and whose operating results are regularly reviewed by the Bank's chief operating decision maker to make decisions about resources to be allocated to the segment and to assess its performance; furthermore for which discrete financial information is available. The Bank determines operating segments on nature of the business (business segment) or geographically (geographical segment).

Segment revenue, segment expense, segment assets and segment liabilities are determined as those that are directly attributable or can be allocated to a segment on a reasonable basis, including factors such as the nature of items, the conducted activities and the relative autonomy of the unit. The Bank allocates segment revenue and segment expense through an inter-segment pricing process. These allocations are conducted on arm's length terms and conditions. Please find further details on segment reporting in Note 37.

The Bank does not have any foreign segments.

cc) Foreign currencies

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

Transactions in foreign currencies are translated to the respective functional currencies of Bank entities at exchange rates at the dates of the transactions. Monetary assets and liabilities denominated in foreign currencies at the end of the reporting period are retranslated to the functional currency at the exchange rate at that date. The foreign currency gain or loss on monetary items is the difference between amortised cost in the functional currency at the beginning of the period, adjusted for effective interest and payments during the period, and the amortised cost in foreign currency translated at the exchange rate at the end of the period.

Non-monetary assets and liabilities denominated in foreign currencies that are measured at fair value are retranslated to the functional currency at the exchange rate at the date that the fair value was determined. Foreign currency differences arising on retranslation are recognised in profit or loss.

The assets and liabilities of foreign operations, including goodwill and fair value adjustments arising on acquisition and equity put options, are translated to HUF at exchange rates at the end of the reporting period. The income and expense of foreign operations are translated to HUF at exchange rates at the dates of the transactions. Foreign currency differences are recognised directly in equity, in the Currency translation reserve. When a foreign operation is disposed of, in part or in full, the relevant amount in the foreign currency translation reserve is transferred to profit or loss.

dd) Share capital

Shares are classified as share capital when there is no contractual obligation to deliver cash or other financial assets to the holders. Incremental costs directly attributable to the issue of equity instruments are presented in equity as a deduction from the proceeds, net of tax.

ee) Treasury shares

The cost of the Bank's repurchased equity instruments ('treasury shares') is deducted from equity. Gain or loss is not recognised on the purchase, sale, issue, or cancellation of treasury shares. Treasury shares may be acquired and held by the entity or by other members of the consolidated Group. Consideration paid or received is recognised directly in equity.

ff) Earnings per share

The Bank presents basic and diluted earnings per share (EPS) data for its ordinary shares. Basic EPS is calculated by dividing the profit or loss attributable to ordinary shareholders of the Bank by the weighted average number of ordinary shares outstanding during the period. Diluted EPS is determined by adjusting the profit or loss attributable to ordinary shareholders and the weighted average number of ordinary shares outstanding for the effects of all dilutive potential ordinary shares. For further information about basic and diluted EPS, please see Note 32.

gg) The effect of adopting new and revised International Financial Reporting Standards effective from 1 January 2020

The following amendments to the existing standards and new interpretation issued by the IASB and adopted by the EU are effective for the current reporting period:

- **Amendments to References to the Conceptual Framework in IFRS Standards** – adopted by EU on 29 November 2019 (effective for annual periods beginning on or after 1 January 2020),

- **Amendments to IAS 1 “Presentation of Financial Statements” and IAS 8 “Accounting Policies, Changes in Accounting Estimates and Errors”** - Definition of Material – adopted by EU on 29 November 2019 (effective for annual periods beginning on or after 1 January 2020),
- **Amendments to IFRS 9 “Financial Instruments”, IAS 39 “Financial Instruments: Recognition and Measurement”, IFRS 7 “Financial Instruments: Disclosures”** – Interest rate Benchmark Reform - adopted by EU on 15 January 2020 (effective for annual periods beginning on or after 1 January 2020),
- **Amendments to IFRS 16 “Leases”** – Covid 19-Related Rent Concessions adopted by EU on 9 October 2020 (effective for annual periods beginning on or after 1 June 2020),
- **Amendments to IFRS 3 “Business Combinations”** – adopted by EU on 21 April 2020 (effective for annual periods beginning on or after 1 January 2020).

The adoption of these amendments to the existing standards has not led to any material changes in the Bank’s financial statements.

hh) New and revised Standards and Interpretations issued by IASB and adopted by the EU but not yet effective

At the date of authorisation of these financial statements, there are new standards, amendments to the existing standards nor interpretations which are issued by IASB and adopted by the EU and which are not yet effective:

- **Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16 “Interest Rate Benchmark Reform – Phase 2** adopted by EU on 13 January 2021 (effective for annual periods beginning on or after 1 January 2021)
- **Amendments to IFRS 4 “Insurance Contracts” deferral of IFRS 9** adopted by EU on 15 December 2020 (effective for annual periods beginning on or after 1 January 2021)

The Bank does not adopt these new standards and amendments to existing standards before their effective date. The Bank anticipates that the adoption of these new standards, amendments to the existing standards and new interpretations will have no material impact on the financial statements of the Bank in the period of initial application.

ii) Standards and Interpretations issued by IASB but not yet adopted by the EU

At present, IFRS as adopted by the EU do not significantly differ from regulations adopted by the International Accounting Standards Board (IASB) except for the following new standards, amendments to the existing standards and new interpretation, which were not endorsed for use in EU as at 29 April 2021:

- **IFRS 17 “Insurance Contracts” including amendments to IFRS 17** (effective for annual periods beginning on or after 1 January 2023),
- **Amendments to IFRS 3 “Business Combinations”; IAS 16 “Property, Plant and Equipment”; IAS 37 “Provisions, Contingent Liabilities and Contingent Assets”** - Annual Improvements (effective for annual periods beginning on or after 1 January 2022),

- **Amendments to IAS 1 “Presentation of Financial Statements”** - Classification of Liabilities as Current or Non-Current (effective for annual periods beginning on or after 1 January 2023),
- **Amendments to IFRS 10 “Consolidated Financial Statements” and IAS 28 “Investments in Associates and Joint Ventures”** - Sale or Contribution of Assets between an Investor and its Associate or Joint Venture and further amendments (effective date deferred indefinitely until the research project on the equity method has been concluded).

The Bank anticipates that the adoption of these new standards, amendments to the existing standards and new interpretations will have no material impact on the financial statements of the Bank in the period of initial application.

5. Investments in subsidiaries, jointly controlled entities and associates

Entities included in MKB Group of consolidation and their activities are as follows:

5.1

2020

Company	Percentage of equity owned	Percentage of voting rights	Country of incorporation	Brief description of activities
Euro - Immat Üzemeltetési Kft.	100.00%	100.00%	Hungary	Intangible assets, license maintenance
MKB-Euroleasing Autófinanszírozó Zrt.	100.00%	100.00%	Hungary	Car and consumer finance activities, other finance activities
MKB Bank MRP Szervezet	100.00%	0.00%	Hungary	Special purpose entity for the Employee Share Program
MKB Üzemeltetési Kft.	100.00%	100.00%	Hungary	Property operation and maintenance
Retail Prod Zrt.	100.00%	100.00%	Hungary	Car and consumer finance activities
MKB-Pannónia Alapkezelő Zrt.	49.00%	49.00%	Hungary	Investment fund management activity
MKB Digital Szolgáltató Zrt.	100.00%	100.00%	Hungary	IT services

2019

Company	Percentage of equity owned	Percentage of voting rights	Country of incorporation	Brief description of activities
Euro - Immat Üzemeltetési Kft.	100.00%	100.00%	Hungary	Intangible assets, license maintenance
Exter-Adósságkezelő Kft.	100.00%	100.00%	Hungary	Collecting receivables
Extercom Vagyonkezelő Kft.	100.00%	100.00%	Hungary	Property investments
MKB-Euroleasing Autófinanszírozó Zrt.	100.00%	100.00%	Hungary	Car and consumer finance activities, other finance activities
MKB Bank MRP Szervezet	100.00%	0.00%	Hungary	Special purpose entity for the Employee Share Program
MKB Nyugdíjpénztárt és Egészségpénztárt Kiszolgáló Kft.	100.00%	100.00%	Hungary	Other financial services
MKB Üzemeltetési Kft.	100.00%	100.00%	Hungary	Property operation and maintenance
Retail Prod Zrt.	100.00%	100.00%	Hungary	Car and consumer finance activities
MKB-Pannónia Alapkezelő Zrt.	49.00%	49.00%	Hungary	Investment fund management activity
MKB Digital Szolgáltató Zrt.	100.00%	100.00%	Hungary	IT services

6. Risk management

a) Introduction and overview

All the Bank's activities involve a certain degree of risk assumption. The measurement, evaluation, acceptance and management of these risks are integral parts of the Bank's daily operative activity.

Risk management is an integral part of the Bank's operations and a crucial component of its business and overall financial performance. The MKB Bank's risk management framework has been designed to support the continuous monitoring of the changes of the risk environment and is supported by the strong commitment to a prudent risk management culture both on the strategy and business line levels.

The main principles and priorities of the Bank's risk management function include the ultimate oversight by the Board of Directors (the approval of the Supervisory Board is also required for some specifically defined risk decisions), the importance of independent review of all risk-taking activities separately from business lines, and the proper evaluation, diversification, limitation, monitoring and reporting of all risks. Decisions in respect of major risk principles are approved at group level, and are implemented individually by the own decision making boards of the Bank members.

The effective communication on risk and risk appetite, the on-going initiatives to better identify, measure, monitor and manage risks, the improvement of efficiency, user-friendliness and awareness of key risk processes and practices, and the employment of highly-skilled staff are the bases of running an effective risk management function in the Bank.

The Bank has exposure to the following risks typically from its use of financial instruments:

- credit risk:
The risk of lending comprises the potential risk of the business partner failing to fulfil its payment obligations or failing to do so on time as well as the risk of the value of the receivable diminishing because the business partner's credit rating decreases. Risks originated from loans or other loan type commitments extended to associated enterprises are also included in the Bank's credit risk managing mechanism.
- country risk:
The country risk generally refers to a potential loss triggered by economic, political or other event which takes place in the particular country and cannot be controlled by MKB, as creditor or investor. As a result of such event(s), the obligor cannot fulfil its obligation in time or at all, or the Bank is unable to enforce its rights against the obligor. The components of the country risk are transfer risk, sovereign risk and collective debtor risk.
- participations risk:
The participations risk is defined as the risk related to the following events:
 - potential losses from providing equity / equity instruments or subordinated loan capital. This involves potential losses realised during the sale of participation or loss occurring as a result of a participation's bankruptcy, the (partial) write-off of the participations (also including write-off settled on business or company value or goodwill value), i.e. loss suffered on the book value of the investment
 - potential losses from a possible commitment / liability extended in addition to equity investment (i.e. profit / loss transfer agreements), letters of comfort, capital contribution commitments, additional funding obligations)

- potential losses originating from other risks associated with the participation such as reputation risk, operational risk, exchange rate risk.
- market risk (including foreign exchange and interest rate risks):
Market price risk comprises potential losses from changes in market prices in both the trading and banking books.
- liquidity risk:
MKB defines liquidity as the ability to serve its payment obligations entirely as they fall due and to fund new business at all times without having to accept unplanned liquidation losses on the asset side or increased refinancing rates on the funding side.
- operational risk:
Operational risk means the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. Operational risk includes legal risk, conduct risk, reputational risk, modelling risk and information and communication technology (ICT) risk. Operational risk does not include business and strategic risks.
- legal risk:
Legal risk is the risk of losses due to the non-observance of the scope set by legal provisions and jurisdiction caused by ignorance, lack of diligence in applying law, a delay in reacting to changes in legal framework conditions, unexpected or ex post facto changes in legal framework respectively courts diverse legal judgements from the Bank's side.
- conduct risk:
The conduct risk is classified among the operational risks and reflects any risk in the supply of financial services originated from an inadequate supply of services or deliberately exhibited impermissible conduct. This includes risks arising from fraud and unfair, unethical or aggressive trading practices harmful to consumers.
reputational risk:
Reputational risk is defined as risks have indirect effect on liquidity, capital or profitability based on unfavourable consumer, partnership, shareholder, investor or official sentiment, which is cancelled from the Bank's expected assessment level.
- model risk:
Model is the risk of loss resulting from decisions based on using insufficiently accurate models. Mistakes in models are not necessarily, or not primarily occur from negligence instead limitations of knowledge, not enough data, or changes that cannot be read from past data: simply the fact that the models are never perfect.
- information and communication technology (ICT) risk:
ICT risk means the current or prospective risk of losses due to the inappropriateness or failure of the hardware and software of technical infrastructures, which can compromise the availability, integrity, accessibility and security of such infrastructures and of data. ICT risk also includes risks occur from outsourcing of ICT relevant systems.
- real estate risk:
Real estate risk covers potential losses that could result from fluctuations in the market value of real estate owned by MKB Bank. Real estate risks arising from collateral provided for real estate loans are covered under credit risk.

- **strategic risk:**
Strategic risk is defined as the negative impact on capital and income of business policy decisions, deficient or unsatisfactory implementation of decisions, or slow adjustment to changes in the economic environment.
- **business risk:**
Business risk is defined as unexpected changes in the economic environment that cause negative changes in business volume or margins and are not attributable to other types of risk. It quantifies the difference between planned and actual costs and income.

Below information is presented about the Bank's exposure to each of the above risks, the Bank's objectives, policies and processes for measuring and managing risk, and the Bank's management of capital.

b) Risk management governance

The Bank's Risk Strategy was set up in consistence with the Business Strategy, the Business Strategy of the Magyar Bankholding Zrt. and the regulations of the NBH. The tasks incorporated in the Risk Strategy aiming at ensure a balanced risk/return relationship, development of a disciplined and constructive control environment, defining the Bank's risk assumption willingness, risk appetite and the on-going ability of the Bank to manage its risks and the maintenance of its funds to cover risk exposures in long-term. This will also ensure the capital preservation and guarantee the solvency of the Bank at any time.

Committees	Key responsibilities
Supervisory Board	<ul style="list-style-type: none"> - Control on the highest level of the harmonized and prudent operation of the Bank and the credit institutions, financial enterprises and investment companies under its controlling influence; - Management of the company and steering of the company's internal audit organization; - Analysis of the regular and ad-hoc reports prepared by the Board of Directors.
Audit Committee	<ul style="list-style-type: none"> - The Audit Committee assists the Supervisory Board in auditing the financial reporting system, in the selection of the auditor and in facilitating the Supervisory Board's co-operation with the auditor.
Risk and NPL Committee	<ul style="list-style-type: none"> - In the frame of continuous monitoring of MKB Bank's strategy and risk taking appetite, previously comments the risk taking strategy, the remuneration policy and the quarterly risk reports. Approves the NPL Strategy of the subject year, incl. the related implementation plan and monitors the changes experienced in the proportion of excessively non-performing loans and the NPL Strategy.
Board of Directors	<ul style="list-style-type: none"> - As the company's operative managing body, it carries out management related tasks and ensures the keeping of the company's business books in compliance with the regulations; - Tasks related to the shares and dividend; - Tasks related to the company's organization and scope of activities; - Tasks related to the strategic planning (compilation of the business policy and financial plan and approval of the risk taking strategy); - Approves the policies related to risk assumptions; - Evaluation of the regular and ad-hoc risk reports.
Managing Committee	<ul style="list-style-type: none"> - This is the highest level decision preparation and decision making body working under the control of the Board of Directors; - The Managing Committee makes decisions regarding issues of general and strategic nature submitted for its perusal and issues related to the Group's operation, the company's organization, the control, management and development of HR policies, business issues related to risk taking, furthermore, negotiates issues related to compliance and money laundering and the respective supervision tasks.
Credit Committee	<ul style="list-style-type: none"> - The Bank's permanent body with the highest delegated decision making authority under the Board of Directors; - It is authorized to make case-by-case decisions on credits according to the Risk Decision Competence Regulation, except for customers handled by the Restructuring and Debt Management Directorate.
Restructuring and Debt Management Committee	<ul style="list-style-type: none"> - Organization with the highest level decision making authority regarding the customers handled by the Restructuring and Debt Management Committee; - Decision making competence for credit decisions on deals belonging under the Committee's control, according to the provisions specified in the Risk Decision Competence Regulations; - Authority regarding decision making in terms of debt-to-asset and debt-to-equity conversions, as it is determined in the Risk Decision Competence Regulations.
ALCO	<ul style="list-style-type: none"> - Responsible for the asset and liability management and the management of the Group's liquidity, funding, capital adequacy and market risks; - Responsible for the development, in principle, of policies regarding the liquidity risks, interest rate risks, exchange risks (foreign exchange and securities), capital adequacy risk and the submission of such policies to the Board of Directors at MKB and Group level, including: <ul style="list-style-type: none"> ▪ measurement guidelines and limit system for the above mentioned risks; ▪ competence and decision-making mechanism; ▪ guideline for managing limit excess.
Investment, Operation and Project Priorization Committee	<ul style="list-style-type: none"> - The Committee is responsible for controlling the bank's overall cost structure and revenues; supervises adherence to the limits specified in the annual investment and cost plans; continuously monitors recent changes in the OPEX and CAPEX limits and analyzes the effects made by such changes on the business plan. - Decision making body having competence regarding development requirements and programs connected with issues like IT development efforts and projects and other initiatives, investments and cost requirements or the allocation of related resources. It is responsible for ensuring coordination of the Bank Group's strategic goals and for determining the order of priority in the entire portfolio of projects and developments. - Develops and adopts the Bank's product development processes associated with the pricing principles, in accordance with the Bank's business model and risk management strategy; controls the profitability of the current assortment of products and services.
Ethical Committee	<ul style="list-style-type: none"> - The Committee is responsible for supporting achievement of compliance with the basic principles and expected patterns of behavior stipulated in the Bank's Ethical Code, discusses cases of ethical imperfections and infringements of extreme significance which can impose potential danger to the Bank's operation and goodwill.
Internal Protection Lines Committee	<ul style="list-style-type: none"> - The Committee is responsible for the integration of communication among the various protection lines and for making them regular and systemic features, and for the improvement or, in case, establishment of the communication channels. - By exerting preventive and proactive activities, it ensures, in respect of the MKB Group, timely and successful identification and management (or enforcement of management) of any risk which can lead to any legal non-compliance or to investigations conducted by external authorities or to the adoption by the supervisory authorities of resolutions condemning the Bank's operations. In case, the Committee ensures immediate taking of the necessary correction measures.

c) Credit risk

Credit risk is the risk of financial loss if a customer or a counterparty fails to meet an obligation under a contract. It arises principally from the Bank's lending, trade finance and leasing business, but also from certain off-balance products such as guarantees, and from assets held in the form of debt securities.

For risk management reporting purposes, the Bank considers and consolidates all elements of credit risk exposure (such as individual obligor default risk, country and sector risk).

Credit risk management

The Bank has standards, policies and procedures dedicated to the effective monitoring and managing risk from lending (including debt securities) activities. The risk management of the MKB Bank controls and manages credit risks at high standards, in a centralised manner. Its responsibilities include:

- Formulating the Bank's credit policy in consultation with business units by establishing credit approval policies, standards, limits and guidelines that define, quantify, and monitor credit risk.
- Establishing the authorisation structure for the approval and renewal of credit facilities. In order to establish an adequate credit decision-making system in which decisions are made on time, the limit amounts are established differently according to the customer segment, the customer quality and the business line, for the delegated credit decision authorities and the boards and individual decision-makers of the Business and Risk Units.
- Monitoring the performance and management of retail and wholesale portfolios across the Bank.
- Supervising the management of exposures to debt securities by establishing controls in respect of securities held for trading purposes.
- Establishing and maintaining the Bank's concentration risk management policies ensuring that the concentration of exposure does not exceed the limits stated in the internal and regulatory limit systems and concentration risks are effectively managed without any need for additional capital requirements if possible.
- Developing and maintaining the Bank's risk assessment systems in order to categorise the exposures according to the degree of the risk of financial loss faced and to manage the existing risks adequately. The purpose of the credit (deal) classification system is to define when impairment may be required against specific credit exposures. The risk categorisation system consists of several grades which reflect sufficiently the varying degrees of risk of default and the availability of collateral or other credit risk mitigation options with regard to a specific exposure.
- Providing position statements, guidance and professional support to the business units of the Bank members in credit risk management.

The control systems applied by the Bank enable to control and monitor exposures by customer and retail product segment.

In order to comply with the prudential requirements, MKB Bank developed and operates its borrower group forming concept. As part of that, the borrower group-level monitoring concept is to be highlighted. According to the processes, the complete risk assumption process must be executed at the level of borrower groups: in the case of the individual groups the limit proposal and monitoring process for each individual group members takes place at the same time based on the collective analysis and consideration of risks.

With regards to the management of concentration risks, MKB Bank implemented the global concept of concentration risk limits. As part of the concept, the Bank set up bank and sector level KPI's (key performance indicator) set and product limits, in order to restrain the assumption of further risks arising from the characteristics / risks rooted in different sectors and the assumption of risks of products representing high or special risk. Aiming at avoid high risk concentration within the portfolio, the concentration risk limit value has been established for the total bank portfolio, with the stipulation that the limits of the individual customers / customer groups may exceed this target value only in extraordinary and justified cases, based exclusively on the strategic guidelines approved by the relevant Committee.

The tables required by CRR, but not presented in this Note are available in the Disclosure according to Regulation (EU) No. 575/2013 prepared by MKB Bank, available on our website www.mkb.hu.

The table below shows the Bank's maximum exposure to credit risk at the end of the reporting period:

6.1

31 December 2020	Cash and cash equivalents	Loans and advances to banks	Loans and advances to customers	Securities	Derivative financial assets	OFF B/S exposures
<i>Individually impaired</i>						
Non-default	-	-	-	-	-	-
Default	-	-	11 532	-	-	829
Total individually impaired gross amount	-	-	11 532	-	-	829
Total individually impaired allowance for impairment	-	-	(9 162)	-	-	(381)
Total individually impaired carrying amount	-	-	2 370	-	-	448
<i>Collectively impaired</i>						
Non-default	271 557	82 657	846 812	550 105	-	326 604
Default	-	-	14 556	-	-	487
Total collectively impaired gross amount	271 557	82 657	861 368	550 105	-	327 091
Total collectively impaired allowance for impairment	(34)	(40)	(30 254)	(168)	-	(1 753)
Total collectively impaired carrying amount	271 523	82 617	831 114	549 937	-	325 338
<i>Past due but not impaired</i>						
Non-default	-	-	280	-	-	-
Default	-	-	23	-	-	-
Total past due but not impaired carrying amount	-	-	303	-	-	-
<i>Neither past due nor impaired</i>						
Non-default	22 660	941	271 517	-	-	94 048
Default	-	-	-	-	-	-
Total neither past due nor impaired carrying amount	22 660	941	271 517	-	-	94 048
Total assets measured at fair value	-	-	938	624 090	23 262	-
<i>Other contingent liabilities</i>						
Gross amount of other contingent liabilities	-	-	-	-	-	3 291
Provision for other contingent liabilities	-	-	-	-	-	(426)
Total gross amount	294 217	83 598	1 145 658	1 174 195	23 262	425 259
Total allowance for impairment	(34)	(40)	(39 416)	(168)	-	(2 560)
Total carrying amount	294 183	83 558	1 106 242	1 174 027	23 262	422 699

31 December 2019	Cash and cash equivalents	Loans and advances to banks	Loans and advances to customers	Securities	Derivative financial assets	OFF B/S exposures
<i>Individually impaired</i>						
Non-default	-	-	-	-	-	-
Default	-	-	17 769	-	-	361
Total individually impaired gross amount	-	-	17 769	-	-	361
Total individually impaired allowance for impairment	-	-	(15 226)	-	-	(216)
Total individually impaired carrying amount	-	-	2 543	-	-	145
<i>Collectively impaired</i>						
Non-default	3 269	60 648	746 696	286 468	-	289 526
Default	-	-	19 337	-	-	335
Total collectively impaired gross amount	3 269	60 648	766 033	286 468	-	289 861
Total collectively impaired allowance for impairment	-	(20)	(24 992)	(82)	-	(1 245)
Total collectively impaired carrying amount	3 269	60 628	741 041	286 386	-	288 616
<i>Past due but not impaired</i>						
Non-default	-	-	411	-	-	-
Default	-	-	28	-	-	-
Total past due but not impaired carrying amount	-	-	439	-	-	-
<i>Neither past due nor impaired</i>						
Non-default	52 119	1 764	178 557	-	-	74 826
Default	-	-	35	-	-	60
Total neither past due nor impaired carrying amount	52 119	1 764	178 592	-	-	74 886
Total assets measured at fair value	-	-	1 323	314 508	18 193	-
<i>Other contingent liabilities</i>						
Gross amount of other contingent liabilities	-	-	-	-	-	789
Provision for other contingent liabilities	-	-	-	-	-	(619)
Total gross amount	55 388	62 412	964 156	600 976	18 193	365 897
Total allowance for impairment	-	(20)	(40 218)	(82)	-	(2 080)
Total carrying amount	55 388	62 392	923 938	600 894	18 193	363 817

The effect of pandemic on the Credit risk management

Because of the general payment moratorium the system does not calculate delays, thus status was frozen by the Bank on March 18. Except for clients who voluntarily undertake the payment during the moratorium period, where traditional credit behaviour can be measured.

For customers in the moratorium, the Bank uses alternative solutions that can be used to track changes in credit risk:

For retail customers:

- For customers with primary banking relationship, the Bank monitors the changes in income credits. It can help in the estimation of the ratio of future default in the terms of customer and product group.
- The Bank has a risk model based on CRM data which include account and credit card history that allows the Bank to revise the client's rating on a monthly basis without credit behaviour information. To do this, databases are available monthly, and the Bank can examine the evolution of customer-level ratings. In addition for covering the potential stage 2 transactions management overlay was recognized.

For corporate customers:

- The Bank continues to determine the extent of impairment based on the rating grades and monitoring results. For the rating, the Bank identified the industries under stress. And the standard monitoring activity has been completed by sector and individual customer level categorization based on the estimated crisis impact.
- Changes in the risks include in the potential effects of pandemic are measured at individual level for each customer, which is reflected in the rating and also in the monitoring process.
- Where identified risks require a unique plan of action will be applied.

In addition to the above, the Bank also updated the macro parameters for the whole portfolio. . The Bank applies the most recent parameters from the MNB Inflation Report, and above that management overlay is added based on internal stress parameters.

In summary, the Bank's current modelling methodology is capable of creating a new risk measure on the basis of the above information. It allows to create well-defined customer profiles for customer management. The management overlays were constituted by the Bank because of the uncertainty arisen from the current pandemic situation, the expected regulatory expectations and the future variability of the economic climate.

The net exposure of Bank's customers under moratorium was as follows (percentage of the portfolio is based on the total amount of the Bank's net exposure):

6.1.1

31 December 2020	Number of loans	Outstanding balance	% of portfolio
Core business			
<i>Wholesale</i>			
Refinanced loan	85	17 953	24.19%
Funding for Growth Scheme	625	48 480	31.17%
Factoring	-	-	0.00%
Overdraft	327	18 835	34.03%
Széchenyi Loans	1 292	15 823	36.25%
Other	667	139 257	26.94%
Total Wholesale	2 996	240 348	27.91%
<i>Retail</i>			
Residential mortgage	13 365	92 822	48.90%
<i>HUF</i>	13 294	92 036	48.71%
<i>Foreign currency</i>	71	786	82.05%
Overdraft	7 392	642	83.05%
Personal loan	4 796	3 543	39.76%
Other	1 608	25 218	58.46%
Total Retail	27 161	122 225	49.95%
Total Core business	30 157	362 573	32.81%
Non-core business			
CRE	-	-	0.00%
Total	30 157	362 573	32.78%

The exposure of Bank's customers under moratorium was as follows on 31 December 2020:

6.1.2

Gross amount*	Non-impaired loans		Impaired loans	POCI	Loans at FVTPL
	Stage 1	Stage 2	Stage 3		
<i>Retail</i>					
Low risk	31 625	9	-	2	184
Medium risk	70 608	7 237	-	1 708	98
High risk	4 228	5 197	-	943	4
Default	-	-	5 721	2 188	8
Total Retail	106 461	12 443	5 721	4 841	294
<i>Wholesale</i>					
Low risk	125 428	-	-	-	-
Medium risk	90 637	1 795	-	-	272
High risk	2 420	25 458	-	-	-
Default	-	-	9 479	-	-
Total Wholesale	218 485	27 253	9 479	-	272
Total CRE	-	-	-	-	-

*Gross amount of loans measured at FVTPL represents the fair value of loans

Impairment	Non-impaired loans		Impaired loans	POCI
	Stage 1	Stage 2	Stage 3	
<i>Retail</i>				
Low risk	633	-	-	-
Medium risk	1 548	231	-	231
High risk	103	178	-	143
Default	-	-	3 251	1 218
Total Retail	2 284	409	3 251	1 592
<i>Wholesale</i>				
Low risk	13	-	-	-
Medium risk	1 164	73	-	-
High risk	98	6 540	-	-
Default	-	-	7 250	-
Total Wholesale	1 275	6 613	7 250	-
Total CRE	-	-	-	-

The modified cash flows of Bank's customers under moratorium were as follows:

6.1.3

Financial assets modified during the period 31 December 2020	
Gross carrying amount before modification	1 147 090
Loss allowance before modification	(39 416)
Net amortised cost before modification	1 107 674
Net modification gain / (loss)	(2 370)
Impairment gain or loss	-
Net amortised cost after modification	1 105 304

Offsetting of financial assets and liabilities

This disclosure represents the financial instruments that are set off or that are subject to an enforceable master netting agreement or similar agreement, irrespective whether they are set off or not.

As of 31 December 2020 the Bank had no enforceable master netting agreement or similar agreement which should be set off in accordance with IAS 32.42.

The below table presents all the amounts that could potentially have been subject to an enforceable master netting agreement or similar agreement that are recognized financial instruments. As these agreements and the amounts related to them as financial collateral do not meet some or all offsetting criteria in IAS 32.42., the Bank does not apply offsetting to either of them. This is because the agreements constitute rights for an offset that is enforceable only in case of default, insolvency or bankruptcy of the Bank or its counterparties. In addition the Bank or the counterparties do not intend to settle on a net basis or realize the assets and settle the liabilities simultaneously.

Similar agreements include derivative clearing agreements, global master repurchase agreements. Similar financial instruments include derivatives, sale and repurchase agreements and reverse sale and repurchase agreements. Financial instruments such as loans and deposits are not disclosed in the tables below unless they are offset in the statement of financial position.

The Bank receives and gives collateral in the form of cash and marketable securities in respect of following transactions:

- derivatives
- sale and repurchase agreements, reverse sale and repurchase agreements.

Such collateral is subject to standard industry terms, including an ISDA Credit Support Annex.

The table below presents the potential effect of the not implemented offsetting as well.

6.2

31 December 2020	IAS 32.42			similar netting arrangement			Net amount of financial assets after offsetting/ similar agreement /collaterals
	Gross carrying amount before offsetting	Gross amounts of offsetting	Recognised net carrying amount set off	Carrying amounts of accompanied liabilities	Received collaterals	Carrying amounts + receivabl. collaterals	
	debit	credit		debit	credit		
Offsetting financial assets							
Derivatives							
Derivate financial assets	10 735	-	10 735	3 018	2 418	5 436	5 299
Receivables concerning repos							
Loans and advances to customers	82 751	-	82 751	-	82 751	82 751	-
Financial assets under netting agreements	93 486	-	93 486	3 018	85 169	88 187	5 299
31 December 2020							
Offsetting financial liabilities							
Derivatives							
Derivate financial liabilities	(16 684)	-	(16 684)	3 018	(19 702)	(16 684)	-
Liabilities concerning repos							
Deposit and current accounts	2 732	-	2 732	-	2 732	2 732	-
Financial liabilities under netting agreements	(13 952)	-	(13 952)	3 018	(16 970)	(13 952)	-

31 December 2019	IAS 32.42			similar netting arrangement			Net amount of financial assets after offsetting/ similar agreement /collaterals
	Gross carrying amount before offsetting	Gross amounts of offsetting	Recognised net carrying amount set off	Carrying amounts of accompanied liabilities	Received collaterals	Carrying amounts + receivabl. collaterals	
	debit	credit		debit	credit		
Offsetting financial assets							
Derivatives							
Derivate financial assets	63 561	-	63 561	-	568	568	62 993
Receivables concerning repos							
Loans and advances to customers	29 413	-	29 413	-	-	-	29 413
Financial assets under netting agreements	92 974	-	92 974	-	568	568	92 406

The gross amounts of financial assets and liabilities presented in the table above measured in the financial statements on the following bases:

- Financial assets measured at FVTPL – fair value,
- Derivative financial instruments – fair value,
- Loans and advances to customers – amortised cost, pledged collateral – fair value,
- Deposits and current accounts – amortised cost, pledged collateral – fair value.

The table below reconciles the Net amount after offsetting to the related individual line items of the Statement of Financial position.

6.3

31 December 2020	Net amount after offsetting / similar agreement / collaterals	Carrying amount in the statement of financial position	Financial assets not in scope of offsetting disclosure
Derivative financial assets	10 735	23 262	12 527
Loans and advances to customers	82 751	1 106 242	1 023 491

31 December 2020	Net amount after offsetting / similar agreement / collaterals	Carrying amount in the statement of financial position	Financial assets not in scope of offsetting disclosure
Derivative financial liabilities	(16 684)	35 406	52 090
Deposits and current accounts	2 732	1 877 454	1 874 722

31 December 2019	Net amount after offsetting / similar agreement / collaterals	Carrying amount in the statement of financial position	Financial assets not in scope of offsetting disclosure
Derivative financial assets	31 781	18 193	(13 588)
Loans and advances to customers	29 413	923 938	894 525

31 December 2019	Net amount after offsetting / similar agreement / collaterals	Carrying amount in the statement of financial position	Financial assets not in scope of offsetting disclosure
Derivative financial liabilities	-	44 263	44 263
Deposits and current accounts	-	1 237 260	1 237 260

Credit risk classification system

The Bank's credit risk classification systems and processes differentiate exposures in order to highlight those with greater risk factors and higher potential severity of loss.

For individually significant wholesale financial assets, the classifications are reviewed regularly and amendments, where necessary, are implemented at least monthly in terms of provisions and exposure classification.

Exposures below specific amounts are assessed on a collective basis, in relation to which the credit risk parameters are reviewed at least yearly or, more frequently if required, in line with the changes of the main economic conditions.

The Bank for each balance sheet closing date (the last day of the month) evaluates the changes in the credit risk that have occurred since the initial recognition of the financial assets and allocate the appropriate stage categories.

During the valuation the Bank assesses the change in the risk of default over the life of the financial instrument using all reasonable and supportable information, which is available without undue cost or effort and without exhaustive search of information. The Bank represents lifetime credit losses in the case where credit risk increased significantly.

The financial assets are initially in the stage 1 category, and they can be returned from stage 2 or from stage 3 if the necessary conditions are performed.

The credit risk of the deals are determined by the extent of change between the initial and the actual PD level, the duration of the delay, the client rating and the client handling method. In case of significant credit risk increase the deal is reclassified to stage 2 and lifetime credit losses are recognised on these financial assets.

If the credit risk of a financial asset increases to the point that it is considered credit-impaired (defaulted), the financial asset is transferred to stage 3.

In the stage 1, the time horizon is one year, in the stage 2 the lifetime PiT PD's are estimated. The stage 3 contains the defaulted customers, where the PD equals to 1. In the stage 2, the one year PD is transformed to the lifetime PD, based on the Markov chain, and Vintage analysis estimation of transition probabilities and taken into account the macroeconomic forecast, especially the year-on-year GDP forecasts, in the first three years of the estimation horizon. From the fourth year, the TTC (through-the-cycle) PD has been used.

Collective valuation

According to the credit risk characteristics, similar (homogeneous) financial assets are subject to collective valuation. The basis for the formation of homogeneous groups is the client segmentation and the credit risk product type.

The collectively allocated impairment and provisioning methodology is applied to all retail clients, to the wholesale customers in stage 1 and stage 2 and to the wholesale customer in stage 3 below the client exposure limit.

Determining the collective loss allowance the expected credit loss (ECL) method is applied according to the IFRS 9.

The expected credit loss is determined on the basis of the probability of default (PD), actual losses realized on non-performing transactions the actual losses realized on non-performing deals (LGD) and the credit conversion factor (CCF) probability of becoming a balance sheet item.

The risk parameters are determined based on statistical models. The models are validated at least once a year and reviewed if necessary.

The expected credit loss for financial assets in stage 1 is determined on the basis of a 12-month expected credit loss. Lifetime expected credit losses are recognised on the financial assets in stage 2 and stage 3.

The purchased or originated credit-impaired (POCI) financial assets at the reporting date represent the cumulative changes in lifetime credit risk from the initial recognition. In the Bank's practice, the loans originally disbursed in foreign currency have been converted to forint, and therefore present as POCI assets. Typically mortgage loans were involved.

In the case of financial assets recorded at fair value, the Bank calculates the credit risk component of the discount factor on the basis of the principles used in determining the expected credit loss.

Individual-based valuation

Financial assets in the stage 3 are assessed individually over the exposure limit level.

In determining the level of allowances on individually significant financial assets in stage 3, the Bank applies the scenario-based discounted cash flow method. The amount and timing of expected receipts and recoveries, the value of collateral and the probability of realization are considered in estimating the allowance in each scenario. The scenario weights are used in the calculation of the loss allowance.

The credit conversion factor is taken into account in loss allowance calculation for contingent liabilities.

In case of financial assets are measured individually at fair value the expected loss calculation uses the cash-flow scenarios.

Write-off policy

The Bank, in compliance with the stipulations of legal regulations, writes off a loan / security balance (and any related allowances for impairment losses) when there is documented evidence that no further recovery can be expected. This determination is reached on the basis of a final statement in case of liquidation or upon establishment that after ceasing the debtor and/or collateral provider to exist, and/or after using all proceeds from collaterals there is still unrecovered exposure remaining.

Collateral structure

The Bank applies the basic principle, whereby it extends loans primarily in relation to and based on the customer's repayment capacity, instead of relying too much on the available collateral. Depending on the customer's paying capacity and rating, as well as the product type, unsecured loans may be extended only in strictly regulated and controlled cases. Nevertheless, collateral could mitigate the credit risk.

The main collateral types are as follows:

- primarily mortgages on residential properties in the retail sector;
- pledge on business assets, such as real estates, stock and debtors, in the commercial and industrial sector;
- mortgages on the financed properties in the commercial real estate sector; and
- securities, guarantees,
- money, securities deposited as collateral.

The Bank establishes the coverage ratio required for individual exposures and makes its decisions on the basis of the so-called collateral value of the collateral items instead of their market value. This value is adjusted by conservative estimation, which assists the prudent management of occurring risks, taking into consideration the relevant order of accountability and resolution making during the action. In case of collaterals of non-performing clients the Bank applies so-called liquidation value, which is established by the revaluation of the collateral, involving additional costs arising during the forced sale in relatively short period.

Taking into account the EU and Hungarian regulatory environment and legal practices, and relying on its own experiences and known Hungarian experiences in the enforcement of the collateral items, the Bank restricted, as much as possible (within the limits of the economies of scale) the rules of acceptability of the various collateral items and the calculation of the

collateral and liquidation values assigned to them. The regular monitoring and revaluation of the collateral items securing the individual exposures is an important pillar in the Bank's monitoring system.

The market values determined by the Bank of collaterals held to the amount of the assets' carrying amounts at the end of the reporting period were as follows:

6.4

2020	Loans and advances to customers	Guarantees and contingencies	Letter of credit	Undrawn credit
Cash deposit	9 841	13 505	223	364
Debt securities issued by				
Central governments	-	-	-	-
Companies	62 185	1 298	-	809
Mortgage				
Building (incl. plot)	168 774	14 634	6 326	17 904
Other (ship, patent, chattel, goods stock, lien on assets over total assets, etc.)	188 336	41 539	8 704	25 074
Guarantees from				
Central governments	177 298	40 143	13 384	24 612
Other banks	20 881	12 489	-	-
Companies	63 163	16 647	508	31 152
Others	13 966	3 116	-	4 582
Total collateral	704 444	143 371	29 145	104 497

2019	Loans and advances to customers	Guarantees and contingencies	Letter of credit	Undrawn credit
Cash deposit	22 694	10 296	59	843
Debt securities issued by				
Central governments	55	-	-	-
Companies	59 747	411	-	829
Mortgage				
Building (incl. plot)	262 346	13 271	6 452	17 561
Other (ship, patent, chattel, goods stock, lien on assets over total assets, etc.)	59 211	30 109	7 295	16 702
Guarantees from				
Central governments	117 241	28 766	12 758	30 489
Other banks	15 019	689	-	-
Companies	31 247	13 254	-	25 322
Others	29 288	2 913	-	3 856
Total collateral	596 848	99 709	26 564	95 602

Valuation methods

The aim of collateral valuation is to conduct advisable and stable evaluation of value, taking into consideration the fluctuation of market prices.

The basis of the collateral valuation is provided by the collateral value (reflecting the value that can be realized on its own, independently from the course of business).

Cash deposits:

In case of bails, if the type of the currency of commitments and collaterals is the same, the amount of bail can be taken into account in 100%.

Securities:

The value of securities equals with the latest accessible market value. Revaluation is done in every sixth month.

Mortgage:

In case of real estates the calculation of the collateral value is done on the basis of individual evaluation of the real estate on the occasion of reception, taking into account minimum correction factors determined by the Bank.

The Bank applies 3 main revaluation methods:

- evaluation by experts involved in the list;
- evaluation by the Bank's own experts involving relevant information provided by the 'list' experts;
- statistical method mostly in case of residential real estates

Guarantees:

In course of definition of collateral value, the probability of non-performance of the guarantee (depending on the quality of the guarantor), the Bank's outstanding relevant to guarantee and the empirical value on possibility of calling in guarantees are taken into considerations.

The Bank didn't obtain any assets by taking possession of collateral held as security, or exercising other credit enhancement options.

The management and processes of such assets obtained are regulated in the Bank's Wholesale and Retail Debt to Asset / Debt to Equity Policy.

Concentrations

The Bank monitors and analyses the concentration of credit risk in term of economic activities and risk classification.

An analysis on the gross exposures of credit risk concentration in terms of exposure types and risk classification at the end of the reporting periods is shown below:

6.5

2020	Loans and advances to banks	Loans and advances to customers	Securities	Derivative financial assets	OFF B/S exposures
Category I - without country risk	29 574	10 103	175	2 553	618
Category II - with low to medium country risk	10 052	2 374	1 547	418	5 820
Category III - with medium to high country risk	17	173	876	242	5
Total exposure	39 643	12 650	2 598	3 213	6 443

2019	Loans and advances to banks	Loans and advances to customers	Securities	Derivative financial assets	OFF B/S exposures
Category I - without country risk	20 930	9 610	240	4 007	1 066
Category II - with low to medium country risk	4 205	1 970	7 271	1 753	448
Category III - with medium to high country risk	16	127	-	48	6
Total exposure	25 151	11 707	7 511	5 808	1 520

- Category I comprises the EMU countries
- Category II comprises countries with Moody's rating AAA - Baa3
- Category III comprises countries with Moody's rating Ba1 or worse

The Bank classified the total exposure according to the internationally used and recognized NACE Statistical Classifications of Economic Activities issued by the European Commission.

The following tables show the gross amount and impairment of total exposure by NACE codes and exposure types at the end of the reporting periods:

6.6

31 December 2020	Cash and cash equivalents	Loans and advances to banks	Loans and advances to customers	Securities	Derivative financial assets	OFF B/S exposures
Administrative and support service activities	-	-	397	-	-	91
Mining and quarrying	-	-	130	-	-	149
Construction	-	-	60 054	12 333	4 003	72 166
Manufacturing	-	-	103 392	21 352	2 271	73 326
Human health services and social work activities	-	-	3 542	-	-	1 013
Information and communication	-	-	31 725	8 606	13	5 084
Real estate activities	-	-	36 307	5 638	321	8 146
Public administration and defence, compulsory social security	-	-	118 911	1 091 150	4 166	52 729
Agriculture, forestry and fishing	-	-	15 402	1 312	24	4 447
Arts, entertainment and recreation	-	-	10 922	-	-	11 729
Wholesale and retail trade	-	-	65 792	-	453	38 968
Education	-	-	335	-	2	296
Professional, scientific and technical activities	-	-	76 188	2 508	74	51 380
Accommodation and food service activities	-	-	6 731	-	-	1 658
Transport and storage	-	-	35 749	-	97	10 014
Electricity, gas, steam, air conditioning and water supply	-	-	34 241	525	118	8 116
Financial and insurance activities	292 860	83 523	253 947	26 217	9 039	40 217
Other services (include private retail loans)	1 357	75	291 893	4 554	2 681	45 730
Total exposure	294 217	83 598	1 145 658	1 174 195	23 262	425 259

31 December 2020	Cash and cash equivalents	Loans and advances to banks	Loans and advances to customers	Securities	Derivative financial assets	OFF B/S exposures
Administrative and support service activities	-	-	34	-	-	-
Mining and quarrying	-	-	1	-	-	1
Construction	-	-	6 865	-	-	382
Manufacturing	-	-	6 448	53	-	529
Human health services and social work activities	-	-	675	-	-	11
Information and communication	-	-	1 487	14	-	106
Real estate activities	-	-	940	27	-	55
Public administration and defence, compulsory social security	-	-	173	72	-	25
Agriculture, forestry and fishing	-	-	164	-	-	31
Arts, entertainment and recreation	-	-	870	-	-	4
Wholesale and retail trade	-	-	2 147	-	-	207
Education	-	-	21	-	-	3
Professional, scientific and technical activities	-	-	4 336	-	-	106
Accommodation and food service activities	-	-	218	-	-	22
Transport and storage	-	-	698	-	-	126
Electricity, gas, steam, air conditioning and water supply	-	-	1 304	-	-	22
Financial and insurance activities	34	40	1 159	2	-	37
Other services (include private retail loans)	-	-	11 876	-	-	893
Impairment	34	40	39 416	168	0	2 560

31 December 2019	Cash and cash equivalents	Loans and advances to banks	Loans and advances to customers	Securities	Derivative financial assets	OFF B/S exposures
Administrative and support service activities	-	-	481	-	-	101
Mining and quarrying	-	-	96	-	-	97
Construction	-	-	39 723	-	2 775	64 016
Manufacturing	-	-	103 139	8 340	407	61 363
Human health services and social work activities	-	-	3 746	-	-	487
Information and communication	-	-	33 267	11	13	3 786
Real estate activities	-	-	21 623	-	73	5 007
Public administration and defence, compulsory social security	-	-	73 824	559 895	3 928	38 871
Agriculture, forestry and fishing	-	-	15 075	-	7	4 544
Arts, entertainment and recreation	-	-	1 633	-	5	11 798
Wholesale and retail trade	-	-	62 782	-	391	33 947
Education	-	-	360	-	1	374
Professional, scientific and technical activities	-	-	54 264	1 317	16	41 877
Accommodation and food service activities	-	-	4 416	-	-	2 078
Transport and storage	-	-	35 148	-	64	7 881
Electricity, gas, steam, air conditioning and water supply	-	-	24 969	26	146	12 602
Financial and insurance activities	55 385	62 335	217 728	31 387	7 554	43 111
Other services (include private retail loans)	3	77	271 882	-	2 813	33 957
Total exposure	55 388	62 412	964 156	600 976	18 193	365 897

31 December 2019	Cash and cash equivalents	Loans and advances to banks	Loans and advances to customers	Securities	Derivative financial assets	OFF B/S exposures
Administrative and support service activities	-	-	36	-	-	-
Mining and quarrying	-	-	1	-	-	-
Construction	-	-	5 613	-	-	481
Manufacturing	-	-	11 346	51	-	289
Human health services and social work activities	-	-	1 118	-	-	1
Information and communication	-	-	1 600	-	-	72
Real estate activities	-	-	350	-	-	10
Public administration and defence, compulsory social security	-	-	283	27	-	9
Agriculture, forestry and fishing	-	-	283	-	-	15
Arts, entertainment and recreation	-	-	59	-	-	3
Wholesale and retail trade	-	-	2 137	-	-	118
Education	-	-	22	-	-	4
Professional, scientific and technical activities	-	-	3 405	-	-	73
Accommodation and food service activities	-	-	206	-	-	4
Transport and storage	-	-	526	-	-	16
Electricity, gas, steam, air conditioning and water supply	-	-	999	-	-	5
Financial and insurance activities	-	20	919	4	-	29
Other services (include private retail loans)	-	-	11 315	-	-	951
Impairment	-	20	40 218	82	-	2 080

d) Liquidity risk

Liquidity risk is the risk that the Bank's cash flows may not be adequate to fund operations and meet commitments on a timely and cost-effective basis. This risk arises from mismatches in the timing of cash flows.

Management of liquidity risk

The Bank's approach to managing liquidity is to ensure, as far as possible, that it will always have sufficient liquidity to meet its liabilities when due, under both normal and stressed conditions, without incurring unacceptable losses or risking damage to the MKB's reputation.

The daily liquidity position is monitored and regular liquidity stress testing is conducted under a variety of scenarios covering both normal and more severe market conditions. All liquidity policies and procedures are subject to approval by the Board of Directors following the prior review and approval by the Asset-Liability Management Committee (hereinafter: “ALCO”).

Contractual maturity of liabilities

6.7

2020	Carrying amount	Gross nominal inflow/(outflow)	up to 1 month	1 month to 3 months	3 months to 1 year	1 year to 5 years	5 years and over
<i>Non-derivative liabilities</i>							
Amounts due to other banks	(574 825)	(592 138)	(19 592)	(4 527)	(33 885)	(407 017)	(127 117)
Deposits and current accounts	(1 877 454)	(1 878 336)	(1 660 014)	(144 315)	(71 217)	(2 790)	-
Issued debt securities	(2 343)	(2 344)	-	-	(1 176)	(1 149)	(19)
Subordinated debt	(44 724)	(50 310)	(922)	-	(1 397)	(47 713)	(278)
	(2 499 346)	(2 523 128)	(1 680 528)	(148 842)	(107 675)	(458 669)	(127 414)
<i>Derivative financial liabilities</i>							
Trading: outflow		(220 019)	(50 442)	(20 837)	(63 207)	(41 461)	(44 072)
Trading: inflow		198 557	45 819	17 716	55 107	32 824	47 091
	(35 406)	(21 462)	(4 623)	(3 121)	(8 100)	(8 637)	3 019
<i>Loan commitments</i>							
		(274 877)	(24 097)	(21 438)	(59 453)	(85 625)	(84 264)

2019	Carrying amount	Gross nominal inflow/(outflow)	up to 1 month	1 month to 3 months	3 months to 1 year	1 year to 5 years	5 years and over
<i>Non-derivative liabilities</i>							
Amounts due to other banks	(195 683)	(202 207)	(7 666)	(6 831)	(19 709)	(82 838)	(85 163)
Deposits and current accounts	(1 237 260)	(1 238 049)	(1 140 435)	(31 278)	(43 399)	(22 937)	-
Issued debt securities	(1 331)	(1 331)	-	-	(930)	(401)	-
Subordinated debt	(39 381)	(45 702)	(763)	-	(1 264)	(33 151)	(10 524)
	(1 473 655)	(1 487 289)	(1 148 864)	(38 109)	(65 302)	(139 327)	(95 687)
<i>Derivative financial liabilities</i>							
Trading: outflow		(368 554)	(105 162)	(119 318)	(83 017)	(39 289)	(21 768)
Trading: inflow		320 966	99 565	103 699	46 651	46 960	24 091
	(44 263)	(47 588)	(5 597)	(15 619)	(36 366)	7 671	2 323
<i>Loan commitments</i>							
		(242 662)	(19 610)	(9 861)	(87 610)	(54 577)	(71 004)

The above table shows the undiscounted contractual cash flows of the Bank’s financial liabilities and loan commitments based on their earliest possible date of maturity. The disclosure for derivatives shows the gross inflow and outflow amount for derivatives (e.g., forward exchange contracts and currency swaps).

The Bank’s expected cash flows on these instruments vary significantly from this analysis. For example, demand deposits from customers are expected to maintain a stable or increasing balance; and loan commitments are not all expected to be drawn down immediately. Due to the significant difference between the expected and the contractual cash flows, the Bank’s risk management department use both analyses to manage liquidity risk.

The expected, undiscounted cash flows of the Bank's financial liabilities were as follows:

Expected maturity of liabilities

6.8

2020	Carrying amount	Gross nominal inflow/(outflow)	up to 1 month	1 month to 3 months	3 months to 1 year	1 year to 5 years	5 years and over
<i>Non-derivative liabilities</i>							
Amounts due to other banks	(574 825)	(592 138)	(19 592)	(4 527)	(33 885)	(407 017)	(127 117)
Deposits and current accounts	(1 877 454)	(1 878 336)	(108 441)	(14 630)	(5 544)	(257)	(1 749 464)
Issued debt securities	(2 343)	(2 344)	-	-	(1 176)	(1 149)	(19)
Subordinated debt	(44 724)	(50 310)	(922)	-	(1 397)	(47 713)	(278)
	(2 499 346)	(2 523 128)	(128 955)	(19 157)	(42 002)	(456 136)	(1 876 878)
<i>Derivative financial liabilities</i>							
Trading: outflow		(220 019)	(50 442)	(20 837)	(63 207)	(41 461)	(44 072)
Trading: inflow		198 557	45 819	17 716	55 107	32 824	47 091
	(35 406)	(21 462)	(4 623)	(3 121)	(8 100)	(8 637)	3 019
<i>Loan commitments</i>							
		(54 518)	(17 586)	(36 932)			

2019	Carrying amount	Gross nominal inflow/(outflow)	up to 1 month	1 month to 3 months	3 months to 1 year	1 year to 5 years	5 years and over
<i>Non-derivative liabilities</i>							
Amounts due to other banks	(195 683)	(202 207)	(7 666)	(6 831)	(19 709)	(82 838)	(85 163)
Deposits and current accounts	(1 237 260)	(1 238 049)	(68 375)	(2 445)	(2 578)	(1 184)	(1 163 467)
Issued debt securities	(1 331)	(1 331)	-	-	(930)	(401)	-
Subordinated debt	(39 381)	(45 702)	(763)	-	(1 264)	(33 151)	(10 524)
	(1 473 655)	(1 487 289)	(76 804)	(9 276)	(24 481)	(117 574)	(1 259 154)
<i>Derivative financial liabilities</i>							
Trading: outflow		(368 554)	(105 162)	(119 318)	(83 017)	(39 289)	(21 768)
Trading: inflow		320 966	99 565	103 699	46 651	46 960	24 091
	(44 263)	(47 588)	(5 597)	(15 619)	(36 366)	7 671	2 323
<i>Loan commitments</i>							
		(53 559)	(17 574)	(35 148)	(837)	-	-

The decision of the Management of the Bank, however, is also based on the liquidity gap (net position) between contractual expected in- and outflows, therefore both financial assets and liabilities are grouped into liquidity buckets.

The following table shows the gross amounts of financial current and non-current assets:

6.9

	2020		2019	
	Up to 1 year	Over 1 year	Up to 1 year	Over 1 year
<i>Loans and advances to banks</i>	62 599	20 999	55 648	6 764
measured at AC	62 599	20 999	55 648	6 764
<i>Loans and advances to customers</i>	80 653	1 065 007	86 187	877 969
measured at AC	80 653	1 064 069	86 187	876 646
measured at FVTPL	-	938	-	1 323
<i>Derivative financial assets</i>	10 358	12 904	2 507	15 686
<i>Securities</i>	8 309	1 165 886	5 571	595 405
measured at AC	-	550 106	-	286 469
measured at FVTPL	6 300	10 622	842	4 058
measured at FVTOCI	2 009	605 158	4 729	304 878

The table above represents the gross amounts expected to be recovered or settled within time categories. Impairment on loans and advances to customers has an amount of HUF 39,416 million (2019: HUF 40,218 million).

e) Market risk

Market risk is the risk that changes in market prices, such as interest rate (interest rate risk), equity prices (equity risk), and foreign exchange rates (foreign exchange risk) will affect the Bank's income or the value of its holdings of financial instruments.

Management of market risks

As part of the Risk strategy, the Board of Directors approves the maximum amount and scope of market risks incurable by the Bank, ensured by a comprehensive limit structure broken down by relevant portfolios. The main market risk limit is arising from the annual capital allocation process based on ICAAP requirements.

ALCO is responsible for developing and monitoring the Bank's market risk management policies. ALCO has the overall responsibility for establishing and managing market risk policies for the Bank, within the framework of internal policies, covering risk management, assessment of risk and related limits, competence and decision-making mechanism, and regulation for breaches of limits, approved by the Board of Directors. The members of the ALCO are senior executives who have principal decision-making responsibilities for businesses throughout the whole Bank. At the operational level, market risk is managed by the Money and Capital Markets Managing Directorate on a bank-wide basis.

The objective of market risk management is to manage and control market risk exposures within acceptable parameters, while optimizing the return on risk.

The Bank separates its exposure to market risk between trading and non-trading portfolios.

Trading portfolios include those positions arising from market-making, customer business driven proprietary position-taking and other marked-to-market positions as designated. According to the risk strategy of the Bank there is no own account activity (proprietary trading) with the purpose of short term profit arising from market changes. Trading activities include transactions with debt and equity securities, foreign currencies, and derivative financial instruments.

Non-trading portfolios include positions that arise from the Bank's retail and commercial banking activity and the interest rate management of the Bank's retail and commercial banking assets and liabilities. The Bank's non-trading activities encompass all activities other than accounted for as trading transactions, including lending, accepting deposits, and issuing debt instruments.

Exposure to market risks – trading portfolios

The Bank manages exposure to market risk by establishing and monitoring various limits on trading activities. These limits include:

- Product volume limits define maximum aggregate amounts of trading products and contracts that the Bank may hold at any time.
- FX position limits restrict the long and short position for each currency and the total net amounts of FX positions that can be held in the trading and banking books.
- VaR limits: The VaR limit of a trading portfolio is the estimated maximum loss that will arise on the portfolio over a specified period of time (holding period) from an adverse market movement with a specified probability (confidence level). MKB Bank applies historical and parametric VaR method with 1-day holding period at 99% confidence level.

- PLA (Potential Loss Amounts) limits define maximum amount of loss that the Bank is willing to assume.

The VaR model used is based mainly on historical data. Taking account of market data from the previous one year (250 business days in case of historical VaR and 187 business days in case of parametric VaR), and observed relationships between different markets and prices, the model calculates both diversified and undiversified total VaR, and VaR by risk factors such as interest rate, equity and currency VaR.

Although VaR is an important tool for measuring market risk, the assumptions on which the model is based do give rise to some limitations, including the following:

- A 1-day holding period assumes that it is possible to hedge or dispose of positions within that period. This is considered to be a realistic assumption in almost all cases but may not be the case in situations in which there is severe market illiquidity for a prolonged period.
- A 99% confidence level does not reflect losses that may occur beyond this level. Even within the model used there is a one percent probability that losses could exceed the VaR.
- VaR is calculated on an end-of-day basis and does not reflect exposures that may arise on positions during the trading day.
- VaR only covers “normal” market conditions.
- The VaR measure is dependent upon the Bank’s position and the volatility of market prices. The VaR of an unchanged position reduces if the market price volatility declines and vice versa.

The overall structure of VaR limits is subject to review and approval by ALCO. VaR limits are allocated to trading portfolios. VaR is measured on a daily basis. Daily reports of utilisation of VaR limits are prepared by the Bank’s Risk Unit and regular summaries are submitted to ALCO.

A summary of the VaR position of the Bank's trading portfolios (i.e. only its trading book) as at 31 December and during the period is as follows:

6.10

2020	Average	Maximum	Minimum	Stress (15%)
Foreign currency risk	22	142	1	131
Interest rate risk	105	279	17	-
Equity risk	7	12	1	-
Overall market risk of trading book	134	433	19	131
Credit spread risk of trading book	95	236	8	-

2019	Average	Maximum	Minimum	Stress (15%)
Foreign currency risk	11	56	1	95
Interest rate risk	46	112	14	-
Equity risk	2	3	1	-
Overall market risk of trading book	59	171	16	95
Credit spread risk of trading book	60	150	17	-

Important notes in connection with the table above:

- MKB applies historical and parametric VaR for general market risk:
 - Historical VaR: (1 day holding period; 99% confidence level, number of observation: 250 business days)
 - Parametric VaR: Risk metrics methodology (1 day holding period; 99% confidence level, 0.94 decay factor, number of observation: 187 business days)
- MKB calculates specific interest rate risk (credit spread risk) separately from general interest rate risk based on the swap and bond yield curve spread.
- Bank calculates VaR only on trading-book position.
- There is no commodity in MKB position.
- MKB does not have a significant open position from options therefore there is no volatility VaR calculation.

A potential adverse 15% change in the FX rates (HUF appreciation for long position and HUF depreciation for short position) would cause HUF 131 million losses based on the year-end FX open position.

Exposure to interest rate risk – non-trading portfolios

The principal risk to which non-trading portfolios are exposed is the risk of loss from fluctuations in the future cash flows of financial instrument because of a change in market interest rates.

The management of interest rate risk is supplemented by monitoring the sensitivity of the financial assets and liabilities to various standard and non-standard interest rate scenarios. Standard scenarios that are considered on a monthly basis include a 200 basis point parallel fall or rise in all yield curves worldwide.

ALCO is the monitoring body for compliance with approved limits and is assisted by Risk Controlling in its monitoring activities. A summary of the Bank's interest rate gap position on non-trading portfolios is as follows:

At the end of the reporting period the interest rate profile of the Bank's interest-bearing financial instruments was:

6.11

As at 31 December 2020

Fixed rate instruments	Gross amount
Financial assets	1 183 220
Financial liabilities	(933 020)
Net fixed rate instruments	250 200

Variable rate instruments	Denominated in				
	HUF	CHF	EUR	USD	Other currencies
Financial assets	950 576	1 850	254 414	9 887	3 504
Financial liabilities	(1 172 498)	(4 082)	(311 342)	(71 875)	(6 529)
Net variable rate instruments	(221 922)	(2 232)	(56 928)	(61 988)	(3 025)

As at 31 December 2019

Fixed rate instruments	Gross amount
Financial assets	698 132
Financial liabilities	(331 467)
Net fixed rate instruments	366 665

Variable rate instruments	Denominated in				
	HUF	CHF	EUR	USD	Other currencies
Financial assets	718 166	1 083	204 795	3 068	2 300
Financial liabilities	(819 717)	(4 178)	(244 900)	(68 296)	(5 097)
Net variable rate instruments	(101 551)	(3 095)	(40 105)	(65 228)	(2 797)

According to the annual review, MKB revised its interest rate risk modelling of sight deposits in 2020. According to the results mainly the estimated level of core deposits has changed in the risk modelling of sight deposits. The estimated level of core deposits has increased in case of HUF and EUR currencies both in retail and wholesale business units. In case of USD currency the estimated level of core deposits has increased in retail and has decreased in wholesale business units. The Bank has implemented that, the core deposits are divided into monthly equal amounts during the predicted period in case of HUF, EUR and USD currencies.

An analysis of the Bank's sensitivity to an increase or decrease in market interest rates is as follows:

6.12

2020	Effect on equity	Effect on P/L
<i>HUF</i>		
200 bp increase	(18 479)	2 701
200 bp decrease	30 077	(1 183)
<i>CHF</i>		
200 bp increase	-	(30)
200 bp decrease	-	(20)
<i>EUR</i>		
200 bp increase	5 549	382
200 bp decrease	(943)	1 253
<i>USD</i>		
200 bp increase	(546)	(17)
200 bp decrease	299	(358)
<i>Other currencies</i>		
200 bp increase	9	24
200 bp decrease	(7)	(32)

2020			
in HUF millions			
FCY	Yield curve stress + 200 Bp	Yield curve stress - 200 Bp	Adverse case
EUR	5 549	(943)	(943)
USD	(546)	299	(546)
CHF	-	-	-
GBP	1	(1)	(1)
JPY	-	-	-
Others	(18 472)	30 071	(18 485)
Total	(13 468)	29 426	(19 975)

2019	Effect on equity	Effect on P/L
<i>HUF</i>		
200 bp increase	(22 090)	(2 681)
200 bp decrease	26 214	(6 085)
<i>CHF</i>		
200 bp increase	4	(19)
200 bp decrease	-	(10)
<i>EUR</i>		
200 bp increase	7 833	690
200 bp decrease	(9)	(1 035)
<i>USD</i>		
200 bp increase	2 086	389
200 bp decrease	(1 819)	(1 089)
<i>Other currencies</i>		
200 bp increase	(11)	91
200 bp decrease	10	(74)

2019			
in HUF millions			
FCY	Yield curve stress + 200 Bp	Yield curve stress - 200 Bp	Adverse case
EUR	7 833	(9)	(9)
USD	2 086	(1 819)	(1 819)
CHF	4	-	-
GBP	1	(1)	(1)
JPY	-	-	-
Others	(22 102)	26 225	(22 102)
Total	(12 178)	24 396	(23 931)

The amount of change, during the period and cumulatively, in the fair value of the financial liabilities designated as at fair value through profit or loss, that is attributable to changes in the credit risk of that liabilities are the followings:

6.13

Effect of credit risk changes of liabilities measured at Fair Value Through Profit or Loss	2020	2019
Changes during the reporting period	-	(134)
Changes cumulatively (since designation of the financial liabilities)	-	134
Difference between the financial liability's carrying amount and the amount contractually required to pay at maturity	-	-

The amount which reflects on changes in market conditions for these liabilities as changes in interest rate is estimated as follows:

- First, computing the liability's internal rate of return at the start of the period using the observed market price of the liability and the liability's contractual cash flows at the start of the period. It deducts from this rate of return the observed (base rate of the relevant market) interest rate at the start of the period, to arrive at an instrument-specific component of the internal rate of return.
- Next, calculating the present value of the cash flows associated with the liability using the liability's contractual cash flows at the end of the period and a discount rate equal to the sum of
 - the observed (base rate of the relevant market) interest rate at the end of the period and
 - the instrument-specific component of the internal rate of return as determined in the first point.
- The difference between the observed market price of the liability at the end of the period and the amount determined in the second point is the change in fair value that is not attributable to changes in the observed (base rate in the relevant market) interest rate.

Exposure to other market risks – non-trading portfolios

The Bank is exposed to foreign exchange risk through its holdings of financial instruments denominated in foreign currencies. Exchange risk management aims to reduce the adverse impact of potential changes in the market value of foreign currency financial instruments induced by exchange rate fluctuations.

The Bank's financial position in foreign currencies at the end of the reporting periods was as follows:

6.14

2020	In functional currencies	In foreign currencies				Total
		USD	EUR	CHF	Other	
Net assets	2 386 691	46 656	341 599	2 108	15 582	2 792 636
Net liabilities	2 266 128	84 587	424 292	5 496	12 133	2 792 636
Net derivative and spot instruments (short) / long position	(121 139)	37 884	83 282	3 432	(3 459)	-
Total net currency positions	(576)	(47)	589	44	(10)	-

2019	In functional currencies	In foreign currencies				Total
		USD	EUR	CHF	Other	
Net assets	1 455 308	13 508	299 541	928	3 171	1 772 456
Net liabilities	1 304 748	87 863	366 680	5 643	7 522	1 772 456
Net derivative and spot instruments (short) / long position	(150 152)	74 369	67 215	4 715	3 853	-
Total net currency positions	408	14	76	-	(498)	-

f) Encumbered assets

Encumbered assets according to 680/2014/EU Commission Implementing Regulation at the end of the periods were the following:

6.15

	31 December 2020		31 December 2019	
	Carrying amount	Fair value	Carrying amount	Fair value
<i>Assets of the reporting institution</i>				
Loans on demand	113	113	244	244
Debt securities	495 488	492 158	163 348	153 240
Loans and advances other than loans on demand	132 220	132 220	100 154	-
Total encumbered assets	627 821	624 491	263 746	153 484

6.16

	Non-encumbered	
	Fair value of collateral received or own debt securities issued available for encumbrance	Nominal value of collateral received or own debt securities issued non available for encumbrance
31 December 2020		
<i>Collateral received by the reporting institution</i>		
Loans on demand	4 291	-
Loans and advances other than loans on demand	83 830	-
Other collateral received	-	347 673
Collateral received and own debt securities issued	88 121	347 673
31 December 2019		
<i>Collateral received by the reporting institution</i>		
Loans on demand	648	-
Loans and advances other than loans on demand	31 245	-
Other collateral received	-	251 036
Collateral received and own debt securities issued	31 893	251 036

6.17

	31 December 2020		31 December 2019	
	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered
<i>Carrying amount of selected financial liabilities</i>				
Derivatives	188 727	627 821	93 345	263 746
Deposits	19 835	48 497	11 442	57 515
Repurchase agreements	168 892	579 324	81 903	206 231
Collateralised deposits other than repurchase agreements	2 732	-	-	-
	166 160	579 324	81 903	206 231
Total Sources of encumbrance	188 727	627 821	93 345	263 746

At the end of 2020 the level of encumbered assets determined in accordance with the aforementioned regulation was 21.79%. The total of Bank's encumbered assets belonged to MKB Bank. The main sources and types of encumbrance were arising from having corporate

loans covered by NBH, secured refinancing, from collaterals of mortgage loans, money market deposits as well as collateralized derivative transactions and repo transactions, furthermore the Bank took the opportunity to borrow unconditional fixed-rate secured loan granted by NBH. Encumbrance due to collateral requirement of used clearing systems and central counterparties was not significant. MKB did not have covered bonds issued or securitization.

The most significant secured refinancing facilities were participating in the “Funding for Growth Scheme” refinancing loan program of the NBH. The majority of collateralized derivative transactions were concluded to hedge on balance sheet FX position and interest rate.

g) Credit spread risk

Credit spread risk is the risk of changing market price of the bonds due to change in spread of bonds' issuer which may have negative impact on the Bank's performance.

Managing and monitoring credit spread risk

The framework of credit spread risk management is defined in the risk strategy. According to this risk strategy credit spread risk may be taken only within the approved limits. Credit spread risk is managed on operative level by the Money and Capital Market Managing Directorate. Bank's Risk Unit is responsible for measuring credit spread risk, controlling limit utilisations and reporting it to ALCO.

Risk measurement

Similar to the general interest rate risk measurement the Bank establishes the credit spread risk figures based on the present value of future cash flows.

The applied credit spread stress test values are revised regularly, but at least semi-annually. The length of liquidation periods used for the calculations are matched to the required liquidation time of the products.

h) Operational risks

Operational risk means the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events, and includes legal risk, conduct risk, reputational risk, modelling risk and information and communication technology (ICT) risk. Operational risk does not include business and strategic risks.

Procedure

The principles, rules and procedures that serve to properly identify, manage and monitor operational risk are defined in the Risk Strategy and in the OpRisk policy.

Risk measurement

The operational risk capital requirement of MKB Bank is calculated by using The Standardised Approach (TSA) both at single and group level since January 1st 2008. According to the Standardised Approach the operational risk capital requirement is the average of the preceding three years' total of the weighted governing indicators of the business lines (gross income).

Risk management and monitoring

The system that serves to evaluate operational risk is fully integrated in the Bank's risk management process and in the work processes.

The centralised unit of the Bank's operational risk management is the Centralised OpRisk Management that is responsible for the establishment and maintenance of the internal regulation and organisation of operational risk management and for the establishment and coordination of the oprisk management methods and tools. Besides, its task is to ensure proper loss data collection and in connection with that the reporting obligations.

Besides the Centralised OpRisk Management, Decentralized OpRisk Units (extended to the whole organisation) were established that identify, report and manage operational risks and their tasks and responsibilities are included in the oprisk regulations. The Centralised OpRisk Management keeps independent control over the Decentralised OpRisk Managers that are assigned in the various units and responsible for managing operational risk and reporting of loss events.

At group level the Centralised OpRisk Management of MKB determines the operational risk regulations required from the subsidiaries, and also the framework for operational risk management at group level and in this respect supervises the subsidiaries as well. The centralised and decentralised operational risk management units have also been established in the subsidiaries that have loss data collection and reporting obligation towards the Centralised OpRisk Management of MKB.

The Oprisk Forum started its operation in 2016, where the most significant oprisk events and the relevance and necessity of setting up risk reducing action plans are discussed on quarterly basis.

The Centralised OpRisk Management of MKB prepares a report on the current status of the operational risk management of the Bank and of the subsidiaries for the Board of Directors on a quarterly basis. The Bank fulfils oprisk COREP data delivery to NBH on half-yearly basis.

Risk management methods and tools

Loss data collection

MKB Bank has been performing operational risk loss data collection continuously which includes the electronic reporting and managing of operational risk loss events.

OpRisk Self-Assessment – ORSA

The Bank performs the oprisk self-assessment unit by unit, in order to recognise and understand the operational risks related to the work processes and to increase the level of risk-awareness of the units.

Key Risk Indicators - KRIs

The key risk indicators are those performance/risk ratios that are suitable for revealing areas and factors critical for operational risk, the change of value of which indicates the change of factors important from the point of view of risk occurrence. By defining and monitoring the values of the suitable indicators the Bank intends to help forecasting, preventing and reducing operational risks.

Scenario analysis

Scenario analysis is an expert estimation based on the analysis of current internal processes in order to estimate the frequency and loss effect of rare but significant oprisk events.

The Bank performs scenario analysis on yearly basis.

Model list

The model list contains all models on department level being used in the Bank and describes their goals. It also contains the frequency of their maintenance and validations as well as the way in which their results are used.

Product list

The Bank has established the product list, which contains the most important product groups in order to identify conduct risk related to customer service. It contains the general characteristics of the products as well as the conduct risk factors. By exploring risks, it is possible to reduce or consciously accept them.

Business Continuity Planning

In order to undisturbedly maintain the Bank's operational processes it is necessary to evaluate the potential threats of the certain processes, their probability of occurrence and the potential damages resulting from the fallout of the processes. This risk analysis and the procedures needed to maintain the functionality of the Bank's organisation is included in the Business Continuity Plan and the Disaster Recovery Plan (BCP-DRP). The BCP-DRP includes measures that have to be taken when the processes that are critical regarding the Bank's operation and (eg. IT) resources that support these processes get damaged or become unmaintainable.

Membership of the Hungarian Interbank Operational Risk Database (HunOR)

The Bank is one of the foundation members of the Hungarian Interbank Operational Risk Database (HunOR) and reports their loss data towards regularly and anonymously.

i) Capital management

The Bank's lead regulator, the NBH sets and monitors capital requirements for the Bank as a whole.

Capital allocation

The Bank measures the pillar 1 and pillar 2 risks and the Bank's Asset and Liability Management Committee (ALCO) monitors the results using a monthly reporting framework.

Basel III

The calculations are Basel III/CRR (575/2013/EU regulation) compliant.

The supervisory objectives of Basel III are to promote safety and soundness in the financial system and maintain at least the current overall level of capital in the system, enhance competitive equality, constitute a more comprehensive approach to addressing risks, and focus on internationally active banks. Basel III is structured around three 'pillars': minimum capital requirements, supervisory review process and market discipline. The Capital Requirements Regulation (CRR) is directly effective in Hungary.

Basel III provides three approaches of increasing sophistication to the calculation of pillar 1 credit risk capital requirements. The Bank uses the standardised approach, which requires banks to use external credit ratings to determine the risk weightings applied to rated

counterparties, and groups other counterparties into broad categories and applies standardised risk weightings to these categories.

Basel III also introduces capital requirements for operational. For the capital requirement calculation the Bank currently has adopted the standardized approach to the determination of Bank operational risk capital requirements.

The second pillar of Basel III (Supervisory Review and Evaluation Process - SREP) involves both the Bank and the Supervisory regulators taking a view on whether a Bank should hold additional capital and how much against risks not covered or not entirely covered in pillar 1. In framework of the pillar 2 Internal Capital Adequacy Assessment Process (ICAAP) the Bank introduced policies and processes for measuring capital requirement of risks not captured by pillar 1 and to measure pillar 1 risks with more sophisticated methodology. Under pillar 2 the materiality of the following risks is to be analysed:

- Credit risk
- Market risk
- Liquidity risk
- Risk estate risk and risk derived from other assets
- Participation risk
- Operational risk
- Modell risk
- Business and strategic risk

Pillar 3 of Basel III is related to market discipline and aims to make firms more transparent by requiring them to publish specific, prescribed details of their risks, capital and risk management under the Basel III framework.

The capital requirement is limited by a complex limit system, which contains the limits of the material risk types by institutions and business lines.

6.18

	31 December 2020 Basel III IFRS	31 December 2019 Basel III IFRS
Share capital	100 000	100 000
<i>Outstanding share capital</i>	<i>100 000</i>	<i>100 000</i>
Reserves	100 624	92 103
Deferred tax	(6 707)	(7 718)
Intangible assets	(24 478)	(21 043)
AVA - additional valuation adjustments	(684)	(378)
Additional Tier 1	-	-
Tier 1: Net core capital	168 755	162 964
Subordinated debt	39 165	36 222
Tier 2: Supplementary capital	39 165	36 222
Regulatory capital	207 920	199 186
Risk-weighted assets (RWA)	733 418	601 486
Operational risk (OR)	154 528	171 889
Market risk positions (MR)	11 770	8 590
Total risk weighted assets	899 716	781 965
Regulatory capital / Total assets	7.44%	11.24%
Tier1 ratio	18.76%	20.84%
Capital adequacy ratio	23.11%	25.47%

The table above contains the MKB Bank's separate capital adequacy ratio.

As at 31 December 2020, as an actual figure of the Bank regulatory capital was HUF 207.9 billion based on Basel III IFRS under Supervisory Regulation. The increase of regulatory capital – by HUF 8.7 billion – is derived from the increase of profit and subordinated debt (repurchase in the amount of EUR 48.1 million and new issuance in the amount of EUR 51.3 million, as a result decrease of unused subordinated debt due to the maturity date), decrease of deduction of ESOP program and deferred tax and decrease of negative revaluation reserve, which was compensated by the increase of deduction of intangible assets and increase of negative AVA.

Risk-weighted assets including operational and market risk increased by 15.1% from HUF 782 billion in 2019 to HUF 899.7 billion besides approximately 10.5% weakening of domestic currency. The main part of the increase derived from the increase of business volumes and increase of market risk, which was compensated by the decrease of operational risk.

By application of capital management as a tool, the capital is a first priority decision making factor; therefore the Bank monitors the changes of the capital elements continuously.

Planning and limitation of capital requirements

The owner of MKB with strong capital background contributes to its safety, promotes customer confidence, and helps the Bank to manage the negative effects on its profitability which come from macroeconomic turbulences.

j) Forborne assets

During the normal course of business, the Bank enters into forbearance measures to decrease the potential loan loss and maximize collection opportunities for the borrowers who have problems with their payment ability but not with their willingness and capacity to pay.

Restructured exposures are renegotiated, rescheduled (prolonged) or otherwise revised loans, receivables and credits (including also purchased ones) originated in the framework of an amendment or termination of a previously concluded contract, initiated either by the borrower or the Bank, where

- the contract is amended in order to avoid default because the borrower is unable to fulfill its payment obligations in compliance with the conditions of the original contract due to significant deterioration in its financial position or payment ability, and
- the amendments significantly change the original terms and conditions of the outstanding contract largely in favor of the borrower, as compared to the market terms and conditions generally applicable to contracts of the same type and concluded under the same conditions, or
- a supplementary agreement or a new contract is concluded between the borrower and the Bank that relates to a new loan provided for the repayment of the outstanding debts (principal and / or interest) arising from the original contract that is not terminated, or to any further commitment assumed to avoid any increase in the credit risks and to mitigate the possible loss.

Under its forbearance policies, the Bank grants loan forbearance on a selective basis where the borrower is in default on its debt, or there is a high risk of future default, and there is evidence that the borrower made all reasonable efforts to pay under the original contractual terms, and it is expected that the borrower will be able to meet the revised terms. Both corporate and retail loans are subject to forbearance policies. The Bank generally applies the following types of forbearance measures:

- extension of the tenor / final maturity of the loan,
- renegotiation of original repayment schedule, reschedule instalments,
- agreement on instalment payment,
- reduction of the collateral coverage parallel reducing exposure,
- refinancing of the loan,
- interest rate cut, or lower conditions,
- interest capitalization.

Such exposures and associated credit risks are managed, monitored and reported distinctly by specific restructuring and debt management units of the Bank on the basis of guidelines and procedure rules set by internal regulations incorporating also both legal and supervisory requirements and recommendations. When the conditions of forbearance cease to exist and the following cure period expires, respective assets are returned to normal treatments both from business and risk management perspectives.

To revert to normal treatment regarding corporate customers, additional criteria is that the customer performs its amended contractual obligations duly through a specified period (180 days or 360 days) and its risk position shows significant improvement.

Forborne assets are recorded separately, and the amended terms and conditions of the contract are also indicated in the accounting records. Recognition, derecognition and subsequent valuation of these assets are carried out according to the general rules of accounting as specified by the relevant IFRSs.

The detailed requirements of risk classification and impairment valuation of forborne exposures are included in the accounting policies, and other internal regulations on the valuation of assets and liabilities, as well as in impairment and provisioning policies. Based on these internal guidelines, forbearance measures are always regarded as impairment triggers and, as a consequence, individual impairment assessment should be performed for such exposures where the general methodologies and principles of assessment are to be applied. On the results of such risk assessments, impairment losses and the reversals of previously charged impairments are accounted for according to the common rules defined by IFRS 9.

Comparing to the previous financial year there were no changes in forbearance policies and in practices applied by the Bank. The forbearance definition will change due to the law change to implement in January, 2021. That change would have effect on the definition of place of treatment (Unit). Before the decision making, it is obligatory to examine and define the effect of proposed construction, forborne contract on the NPV (net present value) in all the cases of clients to forborne, treated by Business Units.

It is important to emphasize, that the moratorium linked to pandemic practically postpones the possibility and the realisation of the restructuring concerning the relevant loans to restructure (ceteris paribus the extension of the loans' expiry date) in time to 2021 H2 minimum on the basis of the regulation, because a big part of our clients „applied” for the moratorium.

6.19

	31 December 2020	31 December 2019
Corporate Banking		
Forborn financial assets	10 712	2 520
Allowances for impairment	(8 726)	(1 998)
Carrying amount	1 986	522
Retail and Private Banking		
Forborn financial assets	8 463	9 467
Allowances for impairment	(3 405)	(3 912)
Carrying amount	5 058	5 555
Total carrying amount	7 044	6 077

7. Cash and cash equivalents

7.1

	31 December 2020	31 December 2019
Cash and balances with Central Banks	294 183	55 388
Cash and cash equivalents	294 183	55 388

The Bank is required to maintain a minimum reserve with the NBH equivalent to 1% (2019: 1%) of certain deposits. The balance of the minimum reserve, in line with the prescription of NBH, is based on the balance at the end of October of these deposit accounts and amounted to HUF 15,583 million as at 31 December 2020 (2019: HUF 13,832 million). As at 31 December 2020, cash on hand amounted to HUF 22,646 million (2019: HUF 13,397 million).

8. Loans and advances to banks

8.1

	31 December 2020	31 December 2019
Current and clearing accounts	17 518	6 843
Money market placements	46 021	50 361
Loans and advances	20 059	5 208
Loans and advances to banks (gross amount)	83 598	62 412
Allowance for impairment at the end of period	(40)	(20)
Carrying amount	83 558	62 392

9. Derivative financial assets

9.1

	31 December 2020			31 December 2019		
	Cost	Fair value adjustment	Book value	Cost	Fair value adjustment	Book value
<i>Derivative instruments by type</i>						
FX-based derivative instruments	-	11 677	11 677	-	4 248	4 248
Interest-based derivative instruments	-	11 168	11 168	-	13 446	13 446
Options	229	188	417	104	395	499
Derivative financial assets	229	23 033	23 262	104	18 089	18 193

10. Securities

10.1

	31 December 2020	31 December 2019
<i>Securities measured at FVTOCI</i>		
Hungarian Government bonds	572 959	295 511
Hungarian corporate sector bonds	34 208	6 827
Foreign Government bonds	-	5 953
Foreign equities	-	1 317
Less allowance for impairment	(273)	(70)
<i>Securities measured at AC</i>		
Hungarian Government bonds	491 125	235 990
Hungarian corporate sector bonds	58 981	50 478
Less allowance for impairment	(168)	(82)
<i>Securities measured at FVTPL</i>		
Government Treasury bills	96	24
Government bonds	10 377	4 189
Hungarian corporate sector bonds	245	603
Hungarian equities	103	84
Foreign equities	1 547	-
Investment fund shares	4 554	-
Securities	1 174 027	600 894

The amount of impairment of the FVTOCI financial assets, which is accounted for between other comprehensive income reserve and profit or loss, does not decrease the carrying amount of the financial assets.

The amount of debt securities measured at FVTOCI was HUF 607,167 million at the end of the reporting period. The Bank did not have equity instruments measured at FVTOCI on 31 December 2020.

The revaluation on financial assets measured at FVTOCI has changed to HUF 3,187 million from HUF (3,281) million. The effect on deferred tax is disclosed in Note 30.

At 31 December 2020, HUF 495,488 million (2019: HUF 163,348 million) from the total amount of Securities were pledged as collateral for stock exchange, for NBH related to Funding for Growth Scheme and credit card transactions in the ordinary course of business.

As at 31 December 2020 the total amount of revaluation reserve comprises HUF (3,560) million (2019: HUF (6,747) million).

In 2020, HUF 5,462 million gain (2019: HUF 23,299 million gain) was recognized in the profit or loss relating to securities measured at FVTOCI, which is a reclassification from other comprehensive income into profit or loss.

Related to debt securities measured at amortised cost HUF 6,706 million interest income (2019: HUF 13,413 million) was recognized in the Statement of Profit or Loss and Other Comprehensive Income during the year.

11. Loans and advances to customers

The net amount of Loans and advances to customers was HUF 1,106,242 million, of which HUF 1,105,304 million was measured at amortised cost and HUF 938 million at fair value. The amount of fair value customer loans belonging to the wholesale portfolio was HUF 275 million, while the amount of retail loans was HUF 663 million on 31 December 2020.

11.1

	31 December 2020	31 December 2019
<i>Loans and advances to customers</i>		
measured at AC	1 105 304	922 615
measured at FVTPL	938	1 323
Loans and advances to customers	1 106 242	923 938

Loans and advances to customers measured at amortised cost:

11.2

31 December 2020	Gross amount	Allowance for impairment Stage 1	Allowance for impairment Stage 2	Allowance for impairment Stage 3/POCI	Carrying amount
Carrying amount					
<i>Wholesale</i>					
Refinanced loan	75 197	(313)	(679)	(240)	73 965
Funding for Growth Scheme	161 589	(705)	(4 898)	(462)	155 524
Factoring	15 642	(138)	(12)	(38)	15 454
Overdraft	57 029	(257)	(342)	(1 086)	55 344
Széchenyi Loans	45 008	(576)	(93)	(692)	43 647
Other	534 611	(2 259)	(6 479)	(8 929)	516 944
Total Wholesale	889 076	(4 248)	(12 503)	(11 447)	860 878
<i>Retail</i>					
Residential mortgage	197 923	(2 055)	(416)	(6 216)	189 236
<i>HUF</i>	196 733	(2 046)	(406)	(6 003)	188 278
<i>Foreign currency</i>	1 190	(9)	(10)	(213)	958
Credit card	2 164	(52)	(51)	(65)	1 996
Overdraft	995	(19)	(68)	(135)	773
Personal loan	9 472	(189)	(31)	(342)	8 910
Other	44 154	(480)	(6)	(533)	43 135
Total Retail	254 708	(2 795)	(572)	(7 291)	244 050
Total Core business	1 143 784	(7 043)	(13 075)	(18 738)	1 104 928
Non-core business					
CRE	936	(4)	-	(556)	376
Total	1 144 720	(7 047)	(13 075)	(19 294)	1 105 304

31 December 2019	Gross amount	Allowance for impairment Stage 1	Allowance for impairment Stage 2	Allowance for impairment Stage 3/POCI	Carrying amount
Carrying amount					
<i>Wholesale</i>					
Refinanced loan	55 856	(136)	(649)	(239)	54 832
Funding for Growth Scheme	86 486	(158)	(1 797)	(591)	83 940
Factoring	20 349	(145)	(11)	(63)	20 130
Overdraft	80 602	(383)	(234)	(1 493)	78 492
Széchenyi Loans	31 715	(204)	(101)	(784)	30 626
Other	437 536	(1 666)	(6 153)	(14 668)	415 049
Total Wholesale	712 544	(2 692)	(8 945)	(17 838)	683 069
<i>Retail</i>					
Residential mortgage	200 838	(528)	(293)	(7 627)	192 390
<i>HUF</i>	199 503	(524)	(290)	(7 303)	191 386
<i>Foreign currency</i>	1 335	(4)	(3)	(324)	1 004
Credit card	2 336	(21)	(41)	(81)	2 193
Overdraft	1 147	(11)	(27)	(155)	954
Personal loan	6 749	(90)	(11)	(325)	6 323
Other	27 390	(33)	(3)	(453)	26 901
Total Retail	238 460	(683)	(375)	(8 641)	228 761
Total Core business	951 004	(3 375)	(9 320)	(26 479)	911 830
Non-core business					
<i>CRE</i>	11 829	(41)	-	(1 003)	10 785
Total	962 833	(3 416)	(9 320)	(27 482)	922 615

In 2020, other items included HUF 234,069 million working capital loans, HUF 82,751 million receivables relating to repurchase agreements, HUF 41,196 million investment loans, HUF 76,466 million syndicated loans and HUF 46,983 million loans relating to purchased loans.

In 2019, other items included HUF 240,002 million working capital loans, HUF 40,136 million investment loans, HUF 69,246 million syndicated loans, HUF 21,453 million loans relating to purchased loans.

CRE (previously SCU) remaining portfolio

The Special Credit Unit (SCU) was established in 2011 in order to separate commercial real estate financed customers requiring special treatment and to provide the specific management of their deals. At the end of 2015, significant part of this portfolio has been separated from MKB's portfolio, management of the remaining portfolio is performed by the Corporate Restructuring and Debt Management Directorate.

According to the EU commitments forming part of the Restructuring Plan approved by the European Commission, the gross volume of the remaining CRE (i.e. Commercial Real Estate previously SCU) portfolio had to be reduced below HUF 60 billion by the end of 2019. MKB fulfilled the commitment by the end of 2017. Even so, the portfolio has been reduced significantly in 2018-2019. Fulfilled the EU commitments successfully, the Bank has the intention to continue the CRE-financing. Thus, the performing CRE portfolio (HUF 10.7 billion) was transferred to Business Unit in Q1 2020. Only one CRE customer's claim (HUF 557 million; under liquidation) remained in the portfolio of Restructuring and Debt Management Directorate.

Due to the officially fulfilled EU commitments and the transfer of performing CRE-portfolio to Business Unit, the separated registration of CRE portfolio (i.e. SCU portfolio) was finished on reporting level.

Asset realization strategy

The recovery expectations at the elements of the asset portfolio has been determined based on, the asset realization strategy. In the framework of the asset realization strategy the Bank keeps some assets in long-term in order to maximize recovery from those assets.

Allowances for impairment

11.3

31 December 2020 31 December 2019

Allowances for impairment on loans and advances to customers

Balance at 1 January	40 218	63 875
Impairment loss for the year:		
Increases due to origination and acquisition	7 160	2 445
Decreases due to derecognition	(11 338)	(31 122)
Changes due to change in credit risk (net)	4 486	5 520
Changes due to modifications without derecognition (net)	146	23
Decrease in allowance account due to write-offs	(1 351)	(637)
Other adjustments	95	114
Allowance for impairment at the end of period	39 416	40 218

The aim of the IFRS 9 credit risk scoring system is to assign a PiT (point-in-time) PD to each relevant customer. The IRB rating system for Pillar II. capital requirement calculation was modified according to IFRS 9 requirements. Both of rating systems use the same default definition and model structure, including the quantitative and qualitative sub-models and the explicative variables. The calibration processes are different. In the case of IFRS 9 it depends on the stage of a given customer. In the stage 1, the time horizon is one year, in the stage 2 the lifetime PiT PD's are estimated. The stage 3 contains the defaulted customers, where the PD equals to 1.

In the stage 2, the one year PD is transformed to the lifetime PD, based on the Markov chain, and Vintage analysis estimation of transition probabilities and taken into account the macroeconomic forecast, especially the year-on-year GDP forecasts, in the first three years of the estimation horizon. From the fourth year, the TTC (through-the-cycle) PD has been used.

Note 6.1 provides additional information on the calculation of the Bank's impairment.

The tables below show the breakdown of the gross value and impairment of Loans and advances to customers measured at amortised cost, by stages:

11.3.1

31 December 2020	Gross amount			POCI
	Stage 1	Stage 2	Stage 3	
<i>Retail</i>				
Low risk	74 906	9	-	2
Medium risk	141 589	10 584	-	2 500
High risk	6 621	6 083	-	990
Default	-	-	8 475	2 949
Total Retail	223 116	16 676	8 475	6 441
<i>Wholesale</i>				
Low risk	331 448	-	-	-
Medium risk	471 185	2 979	-	-
High risk	9 051	58 278	-	-
Default	-	-	16 135	-
Total Wholesale	811 684	61 257	16 135	-
<i>CRE</i>				
Medium risk	380	-	-	-
Default	-	-	556	-
Total CRE	380	-	556	-
Total gross amount	1 035 180	77 933	25 166	6 441
31 December 2020	Allowance for impairment			POCI
	Stage 1	Stage 2	Stage 3	
<i>Retail</i>				
Low risk	737	-	-	-
Medium risk	1 946	364	-	389
High risk	112	208	-	150
Default	-	-	5 167	1 585
Total Retail	2 795	572	5 167	2 124
<i>Wholesale</i>				
Low risk	166	-	-	-
Medium risk	3 081	106	-	-
High risk	1 001	12 397	-	-
Default	-	-	11 447	-
Total Wholesale	4 248	12 503	11 447	-
<i>CRE</i>				
Medium risk	4	-	-	-
Default	-	-	556	-
Total CRE	4	-	556	-
Total allowance for impairment	7 047	13 075	17 170	2 124

31 December 2019	Gross amount			POCI
	Stage 1	Stage 2	Stage 3	
<i>Retail</i>				
Low risk	59 338	-	-	-
Medium risk	152 801	4 644	-	2 898
High risk	2 055	2 363	-	396
Default	104	-	9 206	4 655
Total Retail	214 298	7 007	9 206	7 949
<i>Wholesale</i>				
Low risk	276 052	-	-	-
Medium risk	350 572	3 326	-	-
High risk	12 368	47 306	-	-
Default	207	-	22 713	-
Total Wholesale	639 199	50 632	22 713	-
<i>CRE</i>				
Medium risk	10 825	-	-	-
High risk	-	-	-	-
Default	-	-	1 004	-
Total CRE	10 825	-	1 004	-
Total gross amount	864 322	57 639	32 923	7 949
31 December 2019	Allowance for impairment			POCI
	Stage 1	Stage 2	Stage 3	
<i>Retail</i>				
Low risk	85	-	-	-
Medium risk	581	240	-	335
High risk	17	135	-	32
Default	-	-	5 811	2 463
Total Retail	683	375	5 811	2 830
<i>Wholesale</i>				
Low risk	308	-	-	-
Medium risk	1 635	48	-	-
High risk	749	8 897	-	-
Default	-	-	17 838	-
Total Wholesale	2 692	8 945	17 838	-
<i>CRE</i>				
Medium risk	41	-	-	-
High risk	-	-	-	-
Default	-	-	1 003	-
Total CRE	41	-	1 003	-
Total allowance for impairment	3 416	9 320	24 652	2 830

The tables below show the changes of the gross value and impairment of Loans and advances to customers measured at amortised cost, by stages:

11.3.2

Gross amount	Stage 1	Stage 2	Stage 3	POCI	Total
	12-month ECL	Lifetime ECL	Lifetime ECL	Purchased or originated credit-impaired	
Balance at 1 January 2020	864 102	57 636	32 917	7 951	962 606
Transfers:					
Transfers from Stage 1 to Stage 2	(29 742)	29 742	-	-	-
Transfers from Stage 1 to Stage 3	(2 406)	-	2 406	-	-
Transfers from Stage 2 to Stage 1	36 721	(36 721)	-	-	-
Transfers from Stage 2 to Stage 3	-	(4 441)	4 441	-	-
Transfers from Stage 3 to Stage 1	509	-	(509)	-	-
Transfers from Stage 3 to Stage 2	-	2 151	(2 151)	-	-
Transfers to non-current assets held for sale and discontinued operations	(3)	-	(5 474)	(569)	(6 046)
Transfers from non-current assets held for sale and discontinued operations	-	2	1 170	92	1 264
New financial assets originated or purchased	251 915	23 268	2 803	194	278 180
Modification of contractual cash flows of financial assets	(1 966)	(305)	(106)	(95)	(2 472)
FX and other movements	(83 950)	6 601	(10 331)	(1 132)	(88 812)
Balance at 31 December 2020	1 035 180	77 933	25 166	6 441	1 144 720

Allowance for impairment	Stage 1	Stage 2	Stage 3	POCI	Total
	12-month ECL	Lifetime ECL	Lifetime ECL	Purchased or originated credit-impaired	
Balance at 1 January 2020	3 416	9 320	24 652	2 829	40 217
Transfers:					
Transfers from Stage 1 to Stage 2	(215)	215	-	-	-
Transfers from Stage 1 to Stage 3	(219)	-	219	-	-
Transfers from Stage 2 to Stage 1	166	(166)	-	-	-
Transfers from Stage 2 to Stage 3	-	(376)	376	-	-
Transfers from Stage 3 to Stage 1	6	-	(6)	-	-
Transfers from Stage 3 to Stage 2	-	271	(271)	-	-
Transfers to non-current assets held for sale and discontinued operations	-	-	(4 481)	-	(4 481)
Transfers from non-current assets held for sale and discontinued operations	-	-	848	-	848
Changes in PDs/LGDs/EADs	1 907	(294)	2 570	(32)	4 151
New financial assets originated or purchased	949	5 970	423	75	7 417
Modification of contractual cash flows of financial assets	2 474	1 225	-	239	3 938
FX and other movements	(1 437)	(3 090)	(7 160)	(987)	(12 674)
Balance at 31 December 2020	7 047	13 075	17 170	2 124	39 416

Gross amount	Stage 1	Stage 2	Stage 3	POCI	Total
	12-month ECL	Lifetime ECL	Lifetime ECL	Purchased or originated credit-impaired	
Balance at 1 January 2019	822 875	48 501	60 967	17 119	949 462
Transfers:					
Transfers from Stage 1 to Stage 2	(66 236)	66 236	-	-	-
Transfers from Stage 1 to Stage 3	(3 708)	-	3 708	-	-
Transfers from Stage 2 to Stage 1	51 925	(51 925)	-	-	-
Transfers from Stage 2 to Stage 3	-	(11 618)	11 618	-	-
Transfers from Stage 3 to Stage 1	1 812	-	-	(1 812)	-
Transfers from Stage 3 to Stage 2	-	7 614	(7 614)	-	-
Transfers to non-current assets held for sale and discontinued operations	(2 707)	(78)	(23 483)	(7 665)	(33 933)
Transfers from non-current assets held for sale and discontinued operations	257	130	1 388	1 370	3 145
New financial assets originated or purchased	126 163	5 872	863	10	132 908
Modification of contractual cash flows of financial assets	712	-	-	-	712
FX and other movements	(66 991)	(7 096)	(12 718)	(2 883)	(89 688)
Balance at 31 December 2019	864 102	57 636	32 917	7 951	962 606

Allowance for impairment	Stage 1	Stage 2	Stage 3	POCI	Total
	12-month ECL	Lifetime ECL	Lifetime ECL	Purchased or originated credit-impaired	
Balance at 1 January 2019	3 371	7 332	45 365	7 807	63 875
Transfers:					
Transfers from Stage 1 to Stage 2	(1 502)	1 502	-	-	-
Transfers from Stage 1 to Stage 3	(50)	-	50	-	-
Transfers from Stage 2 to Stage 1	1 440	(1 440)	-	-	-
Transfers from Stage 2 to Stage 3	-	(982)	982	-	-
Transfers from Stage 3 to Stage 1	8	-	(8)	-	-
Transfers from Stage 3 to Stage 2	-	665	(665)	-	-
Transfers to non-current assets held for sale and discontinued operations	-	(2)	(21 715)	(4 996)	(26 713)
Transfers from non-current assets held for sale and discontinued operations	8	13	1 037	571	1 629
Changes in PDs/LGDs/EADs	(1 089)	657	(477)	2 042	1 133
New financial assets originated or purchased	1 641	493	266	18	2 418
Modification of contractual cash flows of financial assets	(441)	(139)	(5)	43	(542)
FX and other movements	30	1 221	(178)	(2 656)	(1 583)
Balance at 31 December 2019	3 416	9 320	24 652	2 829	40 217

The deals of customers belonging to the retail portfolio are classified in sets (pools) homogenous from risk consideration. In pools PD, LGD and CCF values are allocated. Internal rating based models calculate the risk parameters which determine the level of impairment.

In case of individually not significant wholesale customers the calculation of impairment and provision has been changed to internal rating based method. The required provisioning rates are calculated based on the credit conversion factor, the statistical analysis of default and the loss given default. Individually assessed items where no specific provision has been set aside the impairment and provision have to be calculated based on the above method.

In case of retail and wholesale exposures collectively assessed provision is allocated for the following portfolios on monthly basis:

- on performing loans Incurred Loss (ICL) is calculated, and
- on non-performing loans Specific Loan Loss Provisions (SLLP) is accumulated.

Since the Bank has introduced the performing and non-performing classification in its provision allocation method instead of product based collective assessment in retail and the new internal method in wholesale, the level of incurred loss has grown.

At 31 December 2020 there were no loans designated as hedged item in a fair value hedge relationship.

12. Other assets

12.1

	31 December 2020	31 December 2019
Prepayments and other debtors	10 865	13 100
Inventory	444	488
Collaterals held in possession	-	33
Other taxes refundable	5 391	2 215
Impairment	(1 551)	(1 580)
Other assets	15 149	14 256

13. Investments in subsidiaries, jointly controlled entities and associates

13.1

	31 December 2020	31 December 2019
Cost	48 373	46 708
Investments in subsidiaries, jointly controlled entities and associates	48 373	46 708

Investments in subsidiaries, jointly controlled entities and associates increased by HUF 1,665 million during the reporting year. The Bank raised the capital of MKB Inkubátor Kft. by HUF 550 million in July, 2020, and revised the impairment on its investments in Extercom Kft. in September 2020, and reversed it in the amount of HUF 230 million, which indicated an increase in investments in subsidiaries. Furthermore the Bank's contribution to the Employee Share Ownership Program (ESOP) changed by HUF 898 million during the reporting year. On 1 April 2020 the Bank sold its investment in MKB Kockázati Tőkealapkezelő Zrt., therefore investments decreased by HUF 13 million.

Financial data of the consolidated subsidiaries are as follows as at 31 December 2020:

13.2

2020

Company	Total assets	Shareholders' equity	Revenues
Euro - Immat Üzemeltetési Kft.	5 660	4 699	2 174
MKB-Euroleasing Autólízing Szolgáltató Zrt.	188 771	5 759	6 136
MKB Bank MRP Szervezet	2 400	2 378	562
MKB Üzemeltetési Kft.	35 924	34 025	6 349
Retail Prod Zrt.	756	726	36
MKB-Pannónia Alapkezelő Zrt.	2 970	2 703	2 847
MKB Digital Szolgáltató Zrt.	1 334	655	3 931

2019

Company	Total assets	Shareholders' equity	Revenues
Euro - Immat Üzemeltetési Kft.	5 689	4 672	1 566
Exter-Adósságkezelő Kft.	17	14	23
Extercom Vagyonkezelő Kft.	277	247	1
MKB-Euroleasing Autólízing Szolgáltató Zrt.	166 427	4 210	5 518
MKB Bank MRP Szervezet	1 750	1 598	1 532
MKB Nyugdíjpénztárt és Egészségpénztárt Kiszolgáló Kft.	645	549	74
MKB Üzemeltetési Kft.	35 387	33 736	6 754
Retail Prod Zrt.	709	678	55
MKB-Pannónia Alapkezelő Zrt.	2 692	2 263	2 887
MKB Digital Szolgáltató Zrt.	1 024	573	1 885

General and financial data of the jointly controlled entities and associates are as follows as at 31 December 2020:

13.3

	31 December 2020	31 December 2019
	MKB-Pannónia Alapkezelő Zrt.	MKB-Pannónia Alapkezelő Zrt.
<i>General data</i>		
	Investment fund management activity	Investment fund management activity
Principal activity	activity	activity
Country of incorporation	Hungary	Hungary
Ownership % (direct & non-direct)	49.00%	49.00%
Proportion of the voting rights held	49.00%	49.00%
Relation	associate	associate
Involvement	equity	equity
<i>Financial data</i>		
Cash & cash equivalents	257	101
Other current assets	5 537	5 145
Current assets	5 794	5 246
Non-current assets	268	248
Total assets	6 062	5 494
Other current liabilities	546	877
Current liabilities	546	877
Total liabilities	546	877
Equity	5 516	4 617
Book value of investment (Carrying amount of the Bank's interest in the Company)	150	150
Interest income	1	-
Other income	5 979	5 978
Revenues	5 980	5 978
Depreciation and amortization	45	26
Income tax expense	416	386
Other Expenses	1 267	1 711
Expenses	1 728	2 123
Profit/(Loss) after taxation for the year	4 252	3 854
Total comprehensive income for the year	4 252	3 854
Dividends received by MKB Bank from the associate	2 402	1 822

14. Intangibles, property and equipment

14.1

31 December 2020	Intangible assets	Freehold property	Equipment	Total
<i>Cost or deemed cost</i>				
Balance at 1 January	44 362	21 134	2 819	68 315
Additions – including internally developed	14 342	2 693	992	18 027
Other modifications	-	(112)	-	(112)
Disposals	(7 616)	(5 006)	(357)	(12 979)
Balance at 31 December	51 088	18 709	3 454	73 251
<i>Depreciation and impairment losses</i>				
Balance at 1 January	23 319	5 273	1 284	29 876
Amortization and depreciation for the year	2 997	2 017	338	5 352
Impairment loss	294	-	-	294
Disposals	-	(1 123)	(294)	(1 417)
Other modifications	-	(67)	-	(67)
Balance at 31 December	26 610	6 100	1 328	34 038
<i>Carrying amounts</i>				
At 1 January	21 043	15 861	1 535	38 439
Balance at 31 December	24 478	12 609	2 126	39 213
31 December 2019	Intangible assets	Freehold property	Equipment	Total
<i>Cost or deemed cost</i>				
Balance at 1 January	38 119	6 547	3 294	47 960
Additions – including internally developed	8 777	14 618	650	24 045
Other modifications	-	(31)	(38)	(69)
Disposals	(2 534)	-	(1 087)	(3 621)
Balance at 31 December	44 362	21 134	2 819	68 315
<i>Depreciation and impairment losses</i>				
Balance at 1 January	21 105	3 165	1 497	25 767
Amortization and depreciation for the year	2 242	2 114	291	4 647
Impairment loss	-	-	2	2
Disposals	(28)	-	(506)	(534)
Other modifications	-	(6)	-	(6)
Balance at 31 December	23 319	5 273	1 284	29 876
<i>Carrying amounts</i>				
At 1 January	17 014	3 382	1 797	22 193
Balance at 31 December	21 043	15 861	1 535	38 439

Depreciation and amortization is presented among "Operating expenses".

In 2020, the most significant components of the investments and developments were the costs related to the introduction of the instant payment system, furthermore in the reporting period the Bank has fine-tuned its Core banking system, replaced at the end of June 2018, which increased the amount of investments and developments. In addition, the Bank disclosed several other items here concerning capitalisations of functional developments of other IT systems and improvements of the Bank's digital services.

Changes in the value of right-of-use assets during the reporting period are disclosed in Note 31.

15. Amounts due to other banks

15.1

	31 December 2020	31 December 2019
Due on demand	3 112	3 279
Money market deposits	2 527	648
Borrowings	566 454	191 756
Repurchase agreement owed to bank	2 732	-
Amounts due to other banks	574 825	195 683

The largest balance of the Amounts due to other banks is HUF 167,367 million, which is the re-financing loans relating to Funding for Growth Scheme at NBH.

16. Deposits and current accounts

16.1

	31 December 2020	31 December 2019
Corporate clients related	1 476 656	902 680
Retail clients related	400 798	334 580
Deposits and current accounts	1 877 454	1 237 260

As at 31 December 2020 and 2019 the Bank had no deposit and current accounts measured at fair value from the total amount.

17. Derivative financial liabilities

17.1

	31 December 2020			31 December 2019		
	Cost	Fair value adjustment	Book value	Cost	Fair value adjustment	Book value
<i>Derivative instruments by type</i>						
FX-based derivative instruments	-	6 892	6 892	-	2 634	2 634
Index-based derivative instruments	-	4	4	-	2	2
Interest-based derivative instruments	-	28 416	28 416	-	41 009	41 009
Credit default swaps	-	-	-	-	36	36
Options	21	73	94	668	(86)	582
Derivative financial liabilities	21	35 385	35 406	668	43 595	44 263

The derivative financial instruments disclosed in the table are measured at fair value through profit or loss.

18. Other liabilities and provision

18.1

	31 December 2020	31 December 2019
Accruals and other creditors	30 616	35 375
Lease liabilities	19 957	21 797
Other taxes payable	1 777	1 731
Provisions for contingencies and commitments	2 560	2 080
Other liabilities and provisions	54 910	60 983

Provision for contingencies and commitments

18.2

	31 December 2020	31 December 2019
<i>Provision for contingencies and commitments</i>		
Balance at 1 January	2 080	1 946
Provisions made during the year	2 012	1 310
Provisions used/reversed during the year	(1 543)	(1 182)
Other movements	11	6
Balance at the end of the reporting period	2 560	2 080

Further information about provisions for contingencies and commitments are disclosed in Note 33.

19. Issued debt securities

The table below shows the new issuance, repayment and other changes during the year:

19.1

Interest	Balance at 1 January	Issued debt securities	Repurchased debt securities	Repaid debt securities	Accrued income	Balance at 31 December
31 December 2020						
Zero coupon	1 331	2 402	(401)	(930)	(59)	2 343
Total	1 331	2 402	(401)	(930)	(59)	2 343

Interest	Balance at 1 January	Issued debt securities	Repurchased debt securities	Repaid debt securities	Revaluation result	Balance at 31 December
31 December 2019						
Zero coupon	733	996	-	(398)	-	1 331
Structured	4 895	-	188	(4 991)	(92)	-
Accrued interest	68	-	-	-	-	-
Total	5 696	996	188	(5 389)	(92)	1 331

The Bank used fair value option revaluation through profit or loss for structured bonds, as they were related to assets, which shared the same risk that gave rise to opposite changes in fair value. On 31 December 2020, the carrying amount of own issued bonds amounted to HUF 2,343 million (2019: HUF 1,331 million). The last transaction recognized at fair value through profit or loss as option at initial recognition expired on 2 July 2019.

20. Subordinated debt

Subordinated debts are direct, unconditional and unsecured subordinated bonds of the Bank, and are subordinated to the claims of the Bank's depositors and other creditors.

20.1

31 December 2020	Interest	Date of issue	Maturity date	Amount in original currency	Original currency	Carrying amount in million HUF
Subordinated debt	Fixed rate	26.05.2017	14.06.2024	36 900 000	EUR	13 845
Subordinated debt	Fixed rate	28.03.2019	15.04.2026	31 000 000	EUR	11 631
Subordinated debt	Fixed rate	26.05.2020	20.07.2028	51 300 000	EUR	19 248
Total				119 200 000	EUR	44 724

31 December 2019	Interest	Date of issue	Maturity date	Amount in original currency	Original currency	Carrying amount in million HUF
Subordinated debt	Fixed rate	26.05.2017	14.06.2024	70 000 000	EUR	23 765
Subordinated debt	Fixed rate	19.03.2018	14.06.2024	15 000 000	EUR	5 092
Subordinated debt	Fixed rate	28.03.2019	15.04.2026	31 000 000	EUR	10 524
Total				116 000 000	EUR	39 381

By the end of the reporting period the amount of the subordinated debt increased to EUR 119.2 million. In May 2020 there was a new issuance in the amount of EUR 51.3 million, and the Bank also repurchased EUR 48.1 million from the subordinated bonds issued previously.

21. Share capital

The Bank's authorised, issued, and fully paid share capital comprises 100 million (2019: 100 million) ordinary shares of HUF 1,000 (2019: HUF 1,000) each. All issued shares rank pari passu in the event of a winding up.

22. Reserves

Share premium

Share premium comprises of premiums on share capital issuances.

Retained Earnings

Retained earnings comprise the accumulated profit after taxes earned in the course of the operating life of an entity of the Bank less any dividend payment.

General reserve

According to the Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (Banking Act), banks shall set aside as general reserve 10% of Profit after taxation. Dividends can be paid only after recognition of general reserve. This reserve can be utilized only for losses derived from ordinary activity. Credit institution can reclassify part or total of its retained earnings into general reserve. Supervisory authority can allow the entity not to set aside the amount calculated as above stated.

The Bank discloses general reserve as part of retained earnings. In 2020, MKB recognized general reserve of HUF 11,448 million (2019: HUF 10,825 million).

Revaluation reserves

Revaluation reserve of financial assets measured at FVTOCI includes the cumulative net change in the fair value until the derecognition. For financial instruments measured at fair value through other comprehensive income, the Bank has recognized an impairment loss in accordance with IFRS 9, which is shown in the Revaluation reserve.

The Bank did not apply any reclassification adjustments relating to components of other comprehensive income.

23. Deferred tax assets and liabilities

Deferred tax assets and liabilities are attributable to the following:

23.1

	31 December 2020			31 December 2019		
	Assets	Liabilities	Net	Assets	Liabilities	Net
Intangibles, property and equipment	171	19	152	179	41	138
Securities	380	-	380	1 596	32	1 564
Loans and advances to customers	-	-	-	690	-	690
Amounts due to customers	-	-	-	479	-	479
Issued debt securities	-	-	-	-	36	(36)
Provision	152	56	96	169	56	113
Derivatives	-	-	-	122	6	116
Other items	-	-	-	74	28	46
Tax loss carry-forwards	6 079	-	6 079	3 868	-	3 868
Offsetting	(75)	(75)	-	(199)	(199)	-
Assets held for sale	-	-	-	40	-	40
Effect on implementation of IFRS	-	-	-	700	-	700
Net tax assets / (liabilities)	6 707	-	6 707	7 718	-	7 718

24. Interest and similar to interest income

24.1

	2020	2019
Cash and cash equivalents	1 666	317
Loans and advances to banks	202	307
Loans and advances to customers	27 124	25 456
Derivatives	5 495	7 665
Securities	16 408	23 182
Interest and similar to interest income	50 895	56 927

Included within various captions under interest income for the year ended 31 December 2020 is a total of HUF 935 million (2019: HUF 1,324 million) accrued on credit impaired financial assets.

25. Interest expense

25.1

	2020	2019
Amounts due to other banks	2 264	957
Deposits from customers	3 311	2 829
Issued debt securities	67	-
Subordinated liabilities	1 867	1 590
Other fees and commissions similar to interest expense	347	294
Derivatives	17 132	13 338
Interest expense	24 988	19 008

26. Net income from commissions and fees

26.1

	2020	2019
Commission and fee income	30 295	35 653
Payment and account services	18 235	20 976
Credit related fees	1 958	2 101
Card services	2 700	2 927
Brokerage fees and other securities business	4 550	5 140
Other commission and fee income	2 852	4 509
Commission and fee expense	6 564	8 282
Payment and account services	396	1 680
Credit related fees	1 416	1 719
Card services	1 775	1 777
Brokerage fees and other securities business	814	1 154
Other commission and fee expense	2 163	1 952
Net income from commissions and fees	23 731	27 371

27. Other operating income / (expense), net

27.1

	2020	2019
Realized net gain / (loss) on securities measured at fair value	7 557	24 212
Realized net gain / (loss) on securities measured at amortised cost	(233)	5 247
Net gain / (loss) on loan and advances measured at fair value	(16)	134
Net gain / (loss) on derivative transactions	16 669	(10 757)
Net foreign exchange gain/(loss)	1 263	9 011
Net fair value results from FVTPL revaluation (FVO)	-	123
Expense relating to bank levies	(1 645)	(1 875)
Transaction duty	(10 265)	(11 935)
Net gain/(loss) on investments in Group companies	77	1 373
Other taxes	(1 737)	(3 080)
Other operating income /(expense), net	(5 549)	(841)
Other operating income /(expense), net	6 121	11 612

In 2020 the Bank did not recognize any result from fair value revaluation of structured bonds designated at fair value through profit or loss (2019: HUF 123 million gains).

Banking tax is shown under “Other expense” as it does not meet the criteria of current income tax.

28. Net impairments / (reversal) and provisions for losses

28.1

	Note	2020	2019
<i>Net impairment loss / (reversal)</i>			
Loans and advances to banks	8	(54)	5
Loans and advances to customers	11	6 039	2 190
Securities	10	286	19
Other assets	12	(26)	(1 169)
Realised loss on sale of loans		662	(1 036)
Non-current assets held for sale and discontinued operations	38	(172)	(5 839)
<i>Provision on</i>			
Guarantees and contingencies	33	469	1 803
Impairment and provision for losses		7 204	(4 027)

29. Operating expense

29.1

	2020	2019
General and administration expense	3 666	1 885
Legal and advisory services	1 917	1 919
Wages and salaries	15 361	15 246
Compulsory social security obligations	3 341	3 512
Occupancy costs	7 764	7 549
Marketing and public relations	700	669
Communication and data processing	8 853	8 810
Operating expense	41 602	39 590

In 2020, the Bank's average statistical employee number was 1,604 (2019: 1,634).

30. Income tax

Income tax expense recognized in the Statement of Profit or Loss and Other Comprehensive Income

30.1

	2020	2019
<i>Current tax expense</i>		
Corporate tax charge – on current year profit	3	1 369
Corporate tax charge – effect of self-monitoring in previous years	-	(418)
<i>Deferred tax (income) / expense</i>		
Origination (reversal) of temporary differences	718	(1 624)
Income tax (income) / expense	721	(673)

Both in the reporting period and in 2019 9% current income tax rate was applied on taxable profit in Hungary. Due to this, 9% rate was applied both for current income tax and deferred tax purposes.

Reconciliation of effective tax rate

30.2

	2020		2019	
	%	HUF million	%	HUF million
<i>Profit before income tax</i>		6 953		41 339
Income tax using the domestic corporation tax rate	9.00%	626	9.00%	3 720
Effect of tax rates in foreign jurisdictions	0.04%	3	0.05%	22
Movement of unrecognized temporary differences	32.02%	2 226	0.00%	-
Non-deductible expense	1.40%	97	0.12%	48
Tax exempt income	-13.54%	(941)	-0.73%	(300)
Re-assessment of unrecognised tax losses carryforwards	-28.62%	(1 990)	-7.37%	(3 046)
Effect of transition	10.07%	700	-1.69%	(700)
Other tax effects	0.00%	-	-1.01%	(417)
Income tax (income) / expense	10.37%	721	-1.63%	(673)

MKB Bank used a prudent approach concerning tax losses. The Bank relied on its available business plans for calculating the amount of tax losses that can be offset against future tax bases. Tax losses can be offset against up to 50% of future tax bases.

On 31 December 2020, the Bank had unused tax losses amounting to HUF 266,077 million (2019: HUF 323,056 million) with the following maturity:

30.3

	2020	2019
Maturity up to 2020	-	59 428
Maturity up to 2025	2 451	-
Maturity up to 2030	263 626	263 628
Tax loss carryforwards	266 077	323 056

The Bank has HUF 198,537 million (2019: HUF 280,078 million) tax losses carried forward, on which no deferred tax asset was recognised.

In 2015, the rules of utilization of tax losses carried forward have changed in Hungary: tax losses arising in 2015 and in following years, can be utilized solely in the subsequent five years following the tax year in which they were generated. Tax losses incurred before 2015 can be utilized until 2030.

The following table presents the main factors of change in deferred tax:

30.4

	2020				
	P/L-effective and neutral effects on deferred tax assets (DTA) and deferred tax liabilities (DTL)	Opening balance DTA/DTL	P/L-effective movement of DTA/DTL	P/L-neutral movement of DTA/DTL	Closing balance DTA/DTL
Deferred Tax Assets - due to taxable temporary differences					
Assets					
Loans and advances to bank, Loans and advances to customers		690	(690)	-	-
Derivative financial assets		122	(122)	-	-
Securities		1 596	(924)	(292)	380
Intangible Assets		179	(8)	-	171
Non-current assets as held for sale		40	(40)	-	-
Other Assets		73	(73)	-	-
Liabilities					
Amounts due to other banks, Deposits and current accounts		479	(479)	-	-
Provisions		169	(17)	-	152
Deferred Tax Assets - due to tax losses		3 868	2 211	-	6 079
Deferred Tax Assets - Tax Credits		700	(700)	-	-
Subtotal DTA before netting		7 916	(842)	(292)	6 782
Deferred Tax Liabilities - due to taxable temporary differences					
Assets					
Securities		(32)	32	-	-
Property, plant and equipment and investment property		(41)	22	-	(19)
Liabilities					
Issued debt securities		(36)	36	-	-
Derivative financial liabilities		(6)	6	-	-
Provisions		(56)	-	-	(56)
Other liabilities		(27)	27	-	-
Subtotal DTL before netting		(198)	123	-	(75)
Subtotal DTA after netting of balance sheet positions		7 916	(842)	(292)	6 782
Subtotal DTL after netting of balance sheet positions		(198)	123	-	(75)
Subtotal DTA after netting completely with DTL		7 718	(719)	(292)	6 707

2019				
P/L-effective and neutral effects on deferred tax assets (DTA) and deferred tax liabilities (DTL)	Opening balance DTA/DTL	P/L-effective movement of DTA/DTL	P/L-neutral movement of DTA/DTL	Closing balance DTA/DTL
Deferred Tax Assets - due to taxable temporary differences				
Assets				
Loans and advances to bank, Loans and advances to customers	690	-	-	690
Derivative financial assets	122	-	-	122
Securities	1 274	-	322	1 596
Intangible Assets	203	(24)	-	179
Non-current assets as held for sale	40	-	-	40
Other Assets	73	-	-	73
				-
Liabilities				
Amounts due to other banks, Deposits and current accounts	479	-	-	479
Provisions	169	-	-	169
				-
Deferred Tax Assets - due to tax losses	2 168	1 700	-	3 868
Deferred Tax Assets - Tax Credits	700	-	-	700
Subtotal DTA before netting	5 918	1 676	322	7 916
Deferred Tax Liabilities - due to taxable temporary differences				
Assets				
Securities	(32)	-	-	(32)
Property, plant and equipment and investment property	(45)	4	-	(41)
Liabilities				
Issued debt securities	(36)	-	-	(36)
Derivative financial liabilities	(6)	-	-	(6)
Provisions	-	(56)	-	(56)
Other liabilities	(27)	-	-	(27)
Subtotal DTL before netting	(146)	(52)	-	(198)
Subtotal DTA after netting of balance sheet positions	5 911	1 676	322	7 909
Subtotal DTL after netting of balance sheet positions	(140)	(52)	-	(192)
Subtotal DTA after netting completely with DTL	5 771	1 624	322	7 717

31. Leases

At the date of the initial application the Bank had only a few leases that were previously classified as finance lease, for which transition to IFRS 16 had no significant impact.

The Bank has no significant sub-lease contracts.

31.1

31 December 2020	Other assets	Properties	Freehold property	IT equipments	Total
<i>Cost or deemed cost</i>					
Balance at 1 January	17	8 192	12 867	412	21 488
Additions	-	2 225	-	766	2 991
Revaluation	-	(98)	-	-	(98)
Disposals	-	-	(7 035)	-	(7 035)
Other modifications	-	109	-	-	109
Balance at 31 December	17	10 428	5 832	1 178	17 455
<i>Depreciation and impairment losses</i>					
Balance at 1 January	4	2 914	1 282	138	4 338
Depreciation for the year	4	880	912	85	1 881
Revaluation	-	(67)	-	-	(67)
Disposals	-	-	(1 123)	-	(1 123)
Balance at 31 December	8	3 727	1 071	223	5 029
<i>Carrying amounts</i>					
Balance at 1 January	13	5 278	11 585	274	17 150
Balance at 31 December	9	6 701	4 761	955	12 426

31 December 2019	Other assets	Properties	Freehold property	IT equipments	Total
<i>Cost or deemed cost</i>					
Balance at 1 January	17	8 179	12 867	450	21 513
Additions	-	13	-	(38)	(25)
Disposals	-	-	(2 035)	-	(2 035)
Balance at 31 December	17	8 192	10 832	412	19 453
<i>Depreciation and impairment losses</i>					
Balance at 1 January	-	2 056	-	67	2 123
Depreciation for the year	4	864	1 282	82	2 232
Disposals	-	(6)	(124)	(11)	(141)
Balance at 31 December	4	2 914	1 158	138	4 214
<i>Carrying amounts</i>					
Balance at 1 January	17	6 123	12 867	383	19 390
Balance at 31 December	13	5 278	9 674	274	15 239

31.2

31 December 2020	Within 3 months	Within 3 months and 1 year	Within 1 year and 3 years	Within 3 years and 5 years	Over 5 years	Total
Contractual value of lease liabilities	766	2 951	8 370	4 986	13 048	30 121

31 December 2019	Within 3 months	Within 3 months and 1 year	Within 1 year and 3 years	Within 3 years and 5 years	Over 5 years	Total
Contractual value of lease liabilities	580	2 583	7 681	5 961	16 764	33 569

31.3

31 December 2020	Long-term	Short-term	Total
Carrying amount of lease liabilities	17 570	2 387	19 957

31 December 2019	Long-term	Short-term	Total
Carrying amount of lease liabilities	19 990	1 807	21 797

31.4

	2020	2019
Interest expense recognized on lease liabilities	1 244	1 542
Expense recognized for short-term leases	-	66
Depreciation charged for the year	(1 879)	(2 215)
Cash outflow for leases	2 368	2 051

The value of contracts for which the Bank does not expect to exercise the extension and / or exercise option is immaterial.

The Bank elected not to recognise right-of-use assets and lease liabilities for short-term leases of machinery that have a lease term of 12 months or less and leases of low-value assets (e.g including printers, IT equipment). The expense relating to leases of low-value assets and short-term leases was HUF 95 million for the reporting period (2019: HUF 103 million).

The relevant rules on measurement, recognition and presentation are disclosed in Note 4.

31.5

	2021	2022	2023	2024	2025	2026	2027	2028	2029
Lease payments that depend on an index	2 168	2 090	1 857	1 063	963	881	841	800	3

32. Earnings per share

The calculation of basic earnings per share on 31 December 2020 based on the net income attributable to ordinary shareholders of HUF 6,232 million (2019: HUF 42,012 million) and a weighted average number of ordinary shares outstanding of 100,000 thousands (2019: 100,000 thousands).

Basic value

31 December 2020

$$\begin{array}{rcccl} & & \text{Net income available to} & & \\ & & \text{ordinary shareholders} & & \text{HUF 6,232 million} \\ \text{Earnings per} & & \text{(in HUF million)} & & \\ \text{Ordinary Share} & = & \frac{\quad}{\quad} & = & \text{HUF 62} \\ \text{(in HUF)} & & \text{Average number of ordinary} & & \\ & & \text{shares outstanding (thousands)} & & \text{100,000 thousands} \end{array}$$

31 December 2019

$$\begin{array}{rcccl} & & \text{Net income available to} & & \text{HUF 42,012 million} \\ & & \text{ordinary shareholders} & & \\ \text{Earnings per} & & \text{(in HUF million)} & & \\ \text{Ordinary Share} & = & \frac{\quad}{\quad} & = & \text{HUF 420} \\ \text{(in HUF)} & & \text{Average number of ordinary} & & \\ & & \text{shares outstanding (thousands)} & & \text{100,000 thousands} \end{array}$$

The calculation of fully diluted earnings per share was based on the profit attributable to ordinary shareholders and the weighted average number of ordinary shares outstanding after any adjustment for the effects of all dilutive potential ordinary shares. In the reporting period and in the previous period there were no dilution factors.

Diluted value

31 December 2020

Diluted Earnings per Share (in HUF)	=	Net income available to ordinary shareholders	=	HUF 6,232 million	=	HUF 62
		(in HUF million)		Average number of ordinary shares outstanding taking into account the dilution factors		

31 December 2019

Diluted Earnings per Share (in HUF)	=	Net income available to ordinary shareholders	=	HUF 42,012 million	=	HUF 420
		(in HUF million)		Average number of ordinary shares outstanding taking into account the dilution factors		

33. Contingencies and commitments

33.1

31 December 2020	Gross amount	Provision				Net amount
		Stage 1	Stage 2	Stage 3	IAS 37	
<i>Contingencies</i>						
Guarantees and similar obligations	120 072	(209)	(395)	(41)	-	119 427
Obligations from letters of credit and other short term trade related items	17 178	(14)	-	-	-	17 164
Other contingent liabilities (including litigation)	11 676	(11)	(9)	-	(426)	11 230
Total contingencies	148 926	(234)	(404)	(41)	(426)	147 821

<i>Commitments</i>						
Undrawn commitments to extend credit	276 333	(877)	(113)	(465)	-	274 878
Total commitments	276 333	(877)	(113)	(465)	-	274 878

31 December 2019	Gross amount	Provision				Net amount
		Stage 1	Stage 2	Stage 3	IAS 37	
<i>Contingencies</i>						
Guarantees and similar obligations	98 914	(101)	(166)	(93)	-	98 554
Obligations from letters of credit and other short term trade related items	14 570	(9)	-	-	-	14 561
Other contingent liabilities (including litigation)	8 793	(6)	(2)	(127)	(619)	8 039
Total contingencies	122 277	(116)	(168)	(220)	(619)	121 154

<i>Commitments</i>						
Undrawn commitments to extend credit	243 620	(306)	(366)	(285)	-	242 663
Total commitments	243 620	(306)	(366)	(285)	-	242 663

34. Use of estimates and judgements

Management discusses with the Bank Supervisory Board the development, selection and disclosure of the Bank's critical accounting policies and estimates, and the application of these policies and estimates.

These disclosures supplement the commentary on financial risk management (see Note 6).

Key sources of estimation uncertainty

Allowances for credit losses

Assets accounted for at amortised cost are evaluated for impairment on a basis described in accounting policy (see Note 4).

The specific counterparty component of the total allowances for impairment applies to financial assets evaluated individually for impairment and is based upon management's best estimate of the present value of the cash flows that are expected to be received. In estimating these cash flows, management makes judgements about a counterparty's financial situation and the net realisable value of any underlying collateral. Each impaired asset is assessed on its merits, and the workout strategy and estimate of cash flows considered recoverable are independently approved by the Credit Risk function.

Collectively assessed impairment allowances cover credit losses inherent in portfolios of loans and advances with similar credit risk characteristics when there is objective evidence to suggest that they contain impaired loans and advances but the individual impaired items cannot yet be identified. In assessing the need for collective loss allowances, management considers factors such as credit quality, portfolio size, concentrations and economic factors. In order to estimate the required allowance, assumptions are made to define the way inherent losses are modelled and to determine the required input parameters, based on historical experience and current economic conditions. The accuracy of the allowances depends on the estimates of future cash flows for specific counterparty allowances and the model assumptions and parameters used in determining collective allowances.

Uncertain or unanticipated future events could result in material adjustments to provisions or additional allowances. The accounting values determined are not fair values or market prices that might be determined if the underlying assets are sold to a third party.

Determining fair values

The determination of fair value for financial assets and liabilities for which there is no observable market price requires the use of valuation techniques as described in accounting policy. For financial instruments that trade infrequently and have little price transparency, fair value is less objective, and requires varying degrees of judgement depending on liquidity, concentration, uncertainty of market factors, pricing assumptions and other risks affecting the specific instrument. See also "Valuation of financial instruments" below.

Critical accounting judgements in applying the Bank's accounting policies

Critical accounting judgements made in applying the Bank's accounting policies include:

Valuation of financial instruments

The Bank's accounting policy on fair value measurements is discussed under Note 4.

The Bank measures fair values using the following hierarchy of methods:

- Level 1: Quoted market price in an active market for an identical instrument.
- Level 2: Valuation techniques based on observable inputs. This category includes instruments valued using: quoted market prices in active markets for similar instruments; quoted prices for similar instruments in markets that are considered less than active; or other valuation techniques where all significant inputs are directly or indirectly observable from market data.
- Level 3: Valuation techniques using significant unobservable inputs. This category includes all instruments where the valuation technique includes inputs not based on observable data and the unobservable inputs could have a significant effect on the instrument's valuation. This category includes instruments that are valued based on quoted prices for similar instruments where significant unobservable adjustments or assumptions are required to reflect differences between the instruments.

Fair values of financial assets and financial liabilities that are traded in active markets are based on quoted market prices or dealer price quotations. For all other financial instruments the Bank determines fair values using valuation techniques. Valuation techniques include net present value and discounted cash flow models, comparison to similar instruments for which market observable prices exist, Black-Scholes and polynomial option pricing models and other valuation models. Assumptions and inputs used in valuation techniques include risk-free and benchmark interest rates, credit spreads and other premia used in estimating discount rates, bond and equity prices, foreign currency exchange rates, equity and equity index prices and expected price volatilities and correlations.

Counterparty risk (CVA) and own credit risk (DVA) is also taken into account by calculation of fair value of derivative transactions except of the followings:

1. Netting of NPVs to counterparty level is allowed only in case of International Swaps and Derivatives Association (ISDA) agreement is available.
2. If the partners have Credit Support Annex (CSA) for the derivative then both CVA and DVA are 0.
3. If the contract covered by collateral then CVA=0.

The objective of valuation techniques is to arrive at a fair value determination that reflects the price of the financial instrument at the end of the reporting period that would have been determined by market participants acting at arm's length.

The Bank uses widely recognised valuation models for determining the fair value of common and more simple financial instruments, like interest rate and currency swaps that use only observable market data and require little management judgement and estimation. Observable prices and model inputs are usually available in the market for listed debt and equity securities, exchange traded derivatives and simple over the counter derivatives like interest rate swaps. Availability of observable market prices and model inputs reduces the need for management judgement and estimation and also reduces the uncertainty associated with determination of fair values. Availability of observable market prices and inputs varies depending on the products and markets and is prone to changes based on specific events and

general conditions in the financial markets.

For more complex instruments, the Bank uses proprietary valuation models, which usually are developed from recognised valuation models. Some or all of the significant inputs into these models may not be observable in the market, and are derived from market prices or rates or are estimated based on assumptions. Example of instruments involving significant unobservable inputs includes certain over the counter structured derivatives and certain loans and securities for which there is no active market. Valuation models that employ significant unobservable inputs require a higher degree of management judgement and estimation in determination of fair value. Management judgement and estimation are usually required for selection of the appropriate valuation model to be used, determination of expected future cash flows on the financial instrument being valued, determination of probability of counterparty default and prepayments and selection of appropriate discount rates.

The table below analyses financial instruments measured at fair value, by valuation method:

34.1

	Note	Quoted market prices in active markets	Valuation techniques - observable inputs	Valuation techniques - significant unobservable inputs	Total
<i>31 December 2020</i>					
Derivative financial assets	9	-	23 262	-	23 262
Securities	10	544 554	79 535	-	624 089
Loans and advances to customers	11	-	-	938	938
Derivate financial liabilities	17	-	35 406	-	35 406
Issued debt securities	19	-	2 343	-	2 343
Total		544 554	140 546	938	686 038
<i>31 December 2019</i>					
Derivative financial assets	9	-	18 193	-	18 193
Securities	10	293 234	21 274	-	314 508
Loans and advances to customers	11	-	-	1 323	1 323
Derivate financial liabilities	17	-	44 263	-	44 263
Issued debt securities	19	-	1 331	-	1 331
Total		293 234	85 061	1 323	379 618

The determination of fair value level and the transfers between levels are in line with accounting policy (see Note 4). There were no transfers between fair value levels in the reporting period ended on 31 December 2020.

There is no active quotation of discount government bonds when they reach within 3-month maturity. For discount government bonds within the maturity of 3 months, MKB Bank is using yield-curve valuation technique. The inputs of the yield-curve are the relevant active market prices, consequently it is considered as Level 2 valuation. The inputs of the where the yield-curve and the applied based currency mismatched it is consider as Level 3 valuation.

As part of its trading activities the Bank enters into OTC structured derivatives, primarily options indexed to equity prices, foreign exchange rates and interest rates, with customers and other banks. Some of these instruments are valued using models with significant unobservable inputs, principally expected long-term volatilities and expected correlations between different asset prices or foreign currency exchange rates. These inputs are estimated based on extrapolation from observable shorter-term volatilities, recent transaction prices, quotes from other market participants and historical data.

In determining fair values, the Bank does not use averages of reasonably possible alternative inputs as averages may not represent a price at which a transaction would take place between market participants on the measurement date. When alternative assumptions are available within a wide range, judgements exercised in selecting the most appropriate point in the range include evaluation of the quality of the sources of inputs (for example, the experience and expertise of the brokers providing different quotes within a range, giving greater weight to a quote from the original broker of the instrument who has the most detailed information about the instrument) and the availability of corroborating evidence in respect of some inputs within the range.

The following table presents the major risks and the amounts of fair value of financial instruments. Each financial instrument is reported at fair value and categorized based on all the risk factors which they are exposed to. Most type of financial instruments are exposed to more than one risk, therefore fair values of those instruments are included in all relevant columns, resulting that the sum of total exposures by line may not be equal to the relevant lines in the Statement of Financial Position.

Nature and extent of exposure to risks arising from financial instruments:

34.2

	Note	Interest	Foreign exchange rate	Other
31 December 2020				
Derivative financial assets	9	12 094	11 997	-
Securities	10	617 886	36 033	-
Loans and advances to customers	11	938	22	-
Derivative financial liabilities	17	28 416	6 892	98
Issued debt securities	19	2 343	-	2 343
Total		661 677	54 944	2 441
31 December 2019				
Derivative financial assets	9	4 748	15 340	-
Securities	10	310 248	8 416	-
Loans and advances to customers	11	1 323	196	-
Derivative financial liabilities	17	41 009	2 634	620
Issued debt securities	19	1 331	-	1 331
Total		358 659	26 586	1 951

35. Accounting classifications and fair values

The estimated fair values disclosed below are designated to approximate values at which these instruments could be exchanged in an arm's length transaction. However, many of the financial instruments have no active market and therefore, fair values are based on estimates using net present value and other valuation techniques (see Note 4, and Note 34), which are significantly affected by the assumptions used on the amount and timing of the estimated future cash flows and discount rates. In many cases, it would not be possible to realise immediately the estimated fair values given the size of the portfolios measured.

The table below sets out the carrying amounts and fair values of the Bank's financial assets and financial liabilities:

35.1

31 December 2020	Note	Fair value through profit or loss	Amortised cost	Fair value through other comprehensive income	Total carrying amount	Fair value
<i>Financial assets</i>						
Cash and cash equivalents	7	-	294 183	-	294 183	294 183
Loans and advances to banks	8	-	83 558	-	83 558	82 642
Derivative financial assets	9	23 262	-	-	23 262	23 262
Securities	10	16 922	549 938	607 167	1 174 027	1 172 547
Loans and advances to customers	11	938	1 105 304	-	1 106 242	1 078 359
Total		41 122	2 032 983	607 167	2 681 272	2 650 993

Financial liabilities

Amounts due to other banks	15	-	574 825	-	574 825	574 825
Deposits and current accounts	16	-	1 877 454	-	1 877 454	1 877 454
Derivate financial liabilities	17	35 406	-	-	35 406	35 406
Issued debt securities	19	-	2 343	-	2 343	2 343
Subordinated debt	20	-	44 724	-	44 724	44 724
Total		35 406	2 499 346	-	2 534 752	2 534 752

31 December 2019	Note	Fair value through profit or loss	Amortised cost	Fair value through other comprehensive income	Total carrying amount	Fair value
<i>Financial assets</i>						
Cash and cash equivalents	7	-	55 388	-	55 388	55 388
Loans and advances to banks	8	-	62 392	-	62 392	61 709
Derivative financial assets	9	18 193	-	-	18 193	18 193
Securities	10	4 900	286 386	309 608	600 894	590 162
Loans and advances to customers	11	1 323	922 615	-	923 938	922 629
Total		24 416	1 326 781	309 608	1 660 805	1 648 081

Financial liabilities

Amounts due to other banks	15	-	195 683	-	195 683	195 683
Deposits and current accounts	16	-	1 237 260	-	1 237 260	1 237 260
Derivate financial liabilities	17	44 263	-	-	44 263	44 263
Issued debt securities	19	1 331	-	-	1 331	1 331
Subordinated debt	20	-	39 381	-	39 381	39 381
Total		45 594	1 472 324	-	1 517 918	1 517 918

The methods and the assumptions applied in determining fair values of financial instruments when a valuation technique is used were as follows:

Cash and cash equivalents

Due to the short term nature, the carrying amount of Cash and cash equivalents is a reasonable approximation of their fair value.

Derivative financial instruments

Fair values of Derivative financial instruments are traded in active markets are based on quoted market prices or dealer price quotations. For all other financial instruments the Bank determines fair values using valuation techniques.

Securities

The fair values of instruments grouped into Securities are based on quoted market prices, when available. If quoted market prices are not available, fair value is estimated using quoted market prices of similar securities. For further information, please refer to Note 10.

Loans and advances to banks and to customers

The fair value of loans and advances is based on observable market transactions, where available. In the absence of observable market transactions, fair value is estimated using discounted cash flow models. Performing loans are grouped, as far as possible, into homogeneous pools segregated by coupon rates. In general, contractual cash flows are discounted using a rate which is sum of the available interest rate which would have been offered if the customer applied for loan at the end of the reporting period plus the counterparty margin. The used interest rates are available in published Terms and Conditions as of 31 December 2020 and the counterparty margin is available in the Bank's systems. The rediscounted cash flows are decreased using by the same impairment percentage as it was used for impairment purpose, and it is considered as fair value of the loan portfolio.

Non-performing loans which are assessed for impairment individually are discounted with discount factors which are calculated as in case of performing loans, but that estimated cash flows of these loans are used for calculation, which was also used for impairment purpose.

In the case of work-out loans where the Bank expects cash flows only from sale of collaterals and therefore they are impaired to the net present value of this amount, the fair value is equal with the carrying amount.

The fair value of Loans and advances to banks and to customers on demand is not different from the amounts receivable at the end of the reporting period.

Amounts due to other banks and Current and deposit accounts

For the purposes of estimating fair value, Amounts due to other banks and Current and deposit accounts are grouped by residual maturity. Fair values are estimated using discounted cash flows, applying current rates offered for deposits of similar remaining maturities plus MKB own credit risk. For determining own credit risk (DVA – Debit Value Adjustment) the bank uses the own PD and LGD used also for risk purposes which is also in line with the DVA calculation method for negative fair value derivatives. The fair value of a deposit repayable on demand is assumed to be the amount payable on demand at the end of the reporting period.

Issued debt securities and Subordinated debt

Fair values are determined using quoted market prices at the end of the reporting period where available, or by reference to quoted market prices for similar instruments plus own credit risk.

36. Related parties

The Bank's related parties include the parent companies, subsidiaries, joint ventures, associates, Key Management Personnel of the Bank and its parent, close family members of Key Management Personnel, consolidation group and entities which are controlled, jointly controlled or significantly influenced, or for which significant voting power is held, by related parties, Key Management Personnel or their close family members. Government-related entities are exempt from the general disclosure based on IAS 24.25. Key Management Personnel are the members of the governing boards of the Bank like Supervisory Board and the members of the Board of Directors.

Transactions with related parties

Related parties have transacted with the Bank during the period as follows:

36.1

	Parent company and its group		Consolidated subsidiaries		Non-consolidated subsidiaries		Associates		Key Management Personnel		Other related parties	
	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019
<i>Assets</i>												
Amounts due from other banks	884	-	-	-	-	-	-	-	-	-	-	-
Loans and advances to customers	-	15 744	175 736	126 484	1 745	1 078	-	237	181	370	208	-
Derivative financial assets	-	57	-	-	-	-	-	-	-	-	372	66
Debt securities	14 109	-	-	-	1 086	-	-	-	-	-	-	-
Equity instruments	-	-	43 764	45 606	1 503	686	150	610	-	-	137	147
Other assets	65	-	7 800	14 620	-	-	-	-	-	-	-	-
<i>Liabilities</i>												
Amounts due to other banks	53 433	-	-	-	-	-	-	-	-	-	-	-
Current and deposit accounts	671	11 342	16 228	12 088	854	192	74	149	289	386	3 328	2 143
Derivative financial liabilities	852	-	-	-	-	-	-	-	-	-	506	149
Other liabilities	1	-	6 423	526	-	-	-	-	-	-	-	-
<i>Income statement</i>												
Interest and similar to interest income	705	702	1 277	986	16	24	-	5	4	3	2	1
Interest expense	(369)	(10)	(68)	(80)	(3)	-	-	-	-	-	(2)	(1)
Net income from commissions and fees	193	539	68	121	15	8	64	51	49	2	18	14
Other net income / (expense)	(110)	(560)	(24)	(64)	(11)	(6)	(2)	(3)	(1 175)	(738)	(12)	(8)
<i>Contingencies and commitments</i>	10	3 779	8 769	8 699	2 374	1 791	-	40	15	1	994	490
<i>Allowances for impairment</i>	5	5 636	32 595	34 784	3 984	2 462	-	3	1	-	2	1

Significant part of the amount outstanding from Key Management Personnel represents mortgages and secured loans granted and these loans are secured over property of the respective borrowers.

The above transactions with other than Key Management Personnel were made in the ordinary course of business and on substantially the same terms, including interest rates and security, as for comparable transactions with persons of a similar standing. The transactions did not involve more than the normal risk of repayment.

Other related parties include the interests of the Key Management Personnel and other investments.

Impairment losses and provisions against balances outstanding with related parties were recognized during ordinary course of impairment assessment. Incurred loss has been recognized on balance sheet items and off balance sheet items with related parties which were individually or collectively assessed.

Key management personnel compensation for the period comprised:

36.2

	2020	2019
Short-term employee benefits	691	737
Termination benefits	72	-
Share-based payment transactions	400	450
Total	1 163	1 187

37. Segment information

The following segment information has been prepared in accordance with IFRS 8, “Operating Segments,” which defines requirements for the disclosure of financial information of an entity’s operating segments. It follows the “management approach”, which requires presentation of the segments on the basis of the internal reports about components of the entity which are regularly reviewed by the chief operating decision-maker in order to allocate resources to a segment and to assess its performance. Management reporting for the Bank is based on IFRS presenting the following segments.

Business segments

The business segments identified by the Bank represent the organizational structure as reflected in its internal management reporting systems. The Bank is organized into four business lines, each with its own distinct market and products. Each business line has its own set of objectives and targets broken down by operating units, which are consistent with the Bank's overall strategic direction.

As of 31 December 2020, the Bank's business segments and their main products were:

Corporate Banking

The Bank provides trade finance, a wide array of credit, account and deposit products, forfeiting and factoring, letters of credit, guarantees, international payments, project and structured finance, investment and financial advisory services to large entities through branches and electronic delivery channels.

Institutional Banking

MKB Bank serves financial institutions, financial service companies and other entities with financial services, as well as international and domestic payments, the Treasury department deals with investments in securities, hedging transactions and correspondent banking services, the Bank participates in bank-to-bank finance.

Retail and Private Banking

The Bank provides a wide range of deposit and savings instrument, credit and debit cards, portfolio management, and a limited number of loan products to high net worth individuals and entrepreneurs through 51 full-service branches and sub-branches (2019: 51 branches), ATMs, telephone and electronic channels.

Other

Residual items which cannot be directly allocated to business segments (mainly general administration expense) are included in the Other category.

37.1

31 December 2020	Note	Corporate Banking	Retail and Private Banking	Institutional Banking	Other	Total
Assets						
Cash and cash equivalents	7	-	-	294 183	-	294 183
Loans and advances to banks	8	-	-	83 558	-	83 558
Derivative financial assets	9	-	-	23 262	-	23 262
Securities	10	82 187	-	1 091 840	-	1 174 027
Loans and advances to customers	11	861 557	244 685	-	-	1 106 242
Non-current assets held for sale and discontinued operations	38	504	-	-	-	504
Other assets	12	-	-	-	15 149	15 149
Current income tax assets	-	-	-	-	1 418	1 418
Deferred tax assets	23	-	-	-	6 707	6 707
Investments in jointly controlled entities and associates	13	-	-	-	48 373	48 373
Intangibles, property and equipment	14	-	-	-	39 213	39 213
Total assets		944 248	244 685	1 492 843	110 860	2 792 636
Liabilities						
Amounts due to other banks	15	-	-	574 825	-	574 825
Deposits and current accounts	16	1 476 656	400 798	-	-	1 877 454
Derivate financial liabilities	17	-	-	35 406	-	35 406
Other liabilities and provisions	18	39 076	3 331	-	12 503	54 910
Issued debt securities	19	-	-	2 343	-	2 343
Subordinated debt	20	-	-	44 724	-	44 724
Shareholders' equity	21, 22	-	-	-	202 974	202 974
Total liabilities		1 515 732	404 129	657 298	215 477	2 792 636
Income statement						
Interest and similar to interest income	24	15 423	10 496	25 762	(786)	50 895
Interest expense	25	(1 033)	(49)	(25 236)	1 330	(24 988)
Net income from commissions and fees	26	13 982	6 375	3 374	-	23 731
Other Income	27	6 822	1 527	16 889	(17 472)	7 766
(Impairment) / Reversal and provision for losses	28	(4 242)	(3 044)	(134)	216	(7 204)
Operating expense	29	(18 658)	(17 063)	(3 168)	(2 713)	(41 602)
Expense related to bank levies	27	-	-	-	(1 645)	(1 645)
Segment result		12 294	(1 758)	17 487	(21 070)	6 953
Other information						
Capital expenditure	-	-	-	-	18 027	18 027
Depreciation and amortisation	14	-	-	-	5 352	5 352

31 December 2019	Note	Corporate Banking	Retail and Private Banking	Institutional Banking	Other	Total
Assets						
Cash and cash equivalents	7	-	-	55 388	-	55 388
Loans and advances to banks	8	-	-	62 392	-	62 392
Derivative financial assets	9	-	-	18 193	-	18 193
Securities	10	34 079	-	566 815	-	600 894
Loans and advances to customers	11	694 399	229 539	-	-	923 938
Non-current assets held for sale and discontinued operations	38	3 930	145	-	-	4 075
Other assets	12	-	-	-	14 256	14 256
Deferred tax assets	23	-	-	-	7 718	7 718
Investments in jointly controlled entities and associates	13	-	-	-	46 708	46 708
Intangibles, property and equipment	14	-	-	-	38 439	38 439
Total assets		732 408	229 684	702 788	107 576	1 772 456
Liabilities						
Amounts due to other banks	15	-	-	195 683	-	195 683
Deposits and current accounts	16	902 680	334 580	-	-	1 237 260
Derivate financial liabilities	17	-	-	44 263	-	44 263
Other liabilities and provisions	18	848	-	-	60 135	60 983
Issued debt securities	19	-	-	1 331	-	1 331
Subordinated debt	21	-	-	39 381	-	39 381
Shareholders' equity	21, 22	-	-	-	193 555	193 555
Total liabilities		903 528	334 580	280 658	253 690	1 772 456
Income statement						
Interest and similar to interest income	24	13 689	9 696	30 043	3 499	56 927
Interest expense	25	(314)	(72)	(17 410)	(1 212)	(19 008)
Net income from commissions and fees	26	17 456	7 594	2 321	-	27 371
Other Income	27	6 037	1 417	17 840	(11 807)	13 487
(Impairment) / Reversal and provision for losses	28	(2 920)	6 745	(6)	208	4 027
Operating expense	29	(18 188)	(16 466)	(3 061)	(1 875)	(39 590)
Expense related to bank levies	27	-	-	-	(1 875)	(1 875)
Segment result		15 760	8 914	29 727	(13 062)	41 339
Other information						
Capital expenditure		-	14 586	-	9 459	24 045
Depreciation and amortisation	14	-	-	-	4 647	4 647

Measurement of segment profit or loss

Segment reporting under IFRS 8 requires a presentation of the segment results based on management reporting methods with reconciliation between the results of the business segments and the separate financial statements. The information provided about each segment is based on the internal reports about segment profit or loss, assets and other information which are regularly reviewed by the chief operating decision maker.

Calculation of intersegment revenue

Intersegment revenues and expenses are calculated on market interest method. In the case of refinanced loans, as well as those linked to a deposit, are evaluated against the connected transaction. Revenues and expenses on refinanced loans and loans linked to deposit are calculated with reference to the interest of the underlying transaction.

Since the Bank's business activities are diverse in nature and its operations are integrated, certain estimates and judgments have been made to apportion revenue and expense items among the business segments.

Both revenues and non-current assets can be connected to domestic activities based on geographical location.

38. Non-current assets held for sale and discontinued operations

In the first half of 2019, the key management of the Bank decided to sale a loan portfolio of HUF 43,213 million (related loss allowances of HUF 32,878 million), which resulted in a reclassification of HUF 10,335 million of loans to held for sale. The Agreement of receivables assignment was signed in the third quarter of 2019. The buyer paid up the total price of HUF 9,022 million. On 31 December 2019 the net amount of non-current assets held for sale and discontinued operations was HUF 4,075 million (gross value of HUF 13,274 million, relating loss allowances of HUF 9,036 million).

On 31 December 2020, a loan-portfolio in net amount of HUF 504 million was reclassified to non-current assets held for sale (gross value of HUF 2,975 million, relating loss allowances of HUF 2,471 million).

Non-current assets held for sale and assets and liabilities discontinued operation include the followings:

38.1

	2020	2019
<i>Assets</i>		
Loans and advances to customers	504	4 075
Total assets	504	4 075

39. Government grants

The NBH launched its three-pillar Funding for Growth Scheme (FGS) on 1 June 2013, primarily to stimulate lending to small and medium-sized enterprises. Under Pillar I and II of the FGS the NBH provided refinancing loans to credit institutions participating in the Scheme, at 0 per cent interest rate and with a maximum maturity of 10 years, which were lent further by the credit institutions to the SMEs with a capped interest margin.

Under Pillar I of the Scheme investment and current asset loans, EU subsidy financing, and loan refinancing denominated in Hungarian Forint could be carried out. Pillar II of the Scheme aimed to reduce the ratio of SME's foreign currency loans, allowing conversion of foreign currency loans to forint loans.

On 11 September 2013 the Monetary Council decided to continue the Scheme, and launched the second phase, which was available until 31 December 2016.

On 16 March 2015, the NBH launched FGS Plus Program, in order to improve access credit facility of small and medium-sized enterprises not participating in FGS so far.

On 6 October 2015, the Monetary Council decided to launch the third phase of FGS – aiming at the gradual ending of the program. The third phase consists of two Pillars, in Pillar II a market priced EUR / HUF swap transaction (CIRS) is linked to the refinancing denominated in Hungarian Forint, which allows credit institutions lending in foreign currency – without any currency risk – to SMEs having natural foreign currency hedge.

The NBH intends to improve the structure of domestic SME lending through the NHP Fixed Income Facility, by improving access to long-term, fixed-rate loans for SMEs, which will be part of the NHP, starting January 1, 2019. Under the NHP Fix program, the NBH provides credit institutions with a null per cent interest rate refinancing loan for a maximum of 10 years, which they further lend to SMEs in the form of loans or financial leases at a limited interest rate up to 2.5% per annum.

In order to alleviate the negative economic effects of the COVID-19 coronavirus pandemic and to avoid credit market disruptions, on 20 April 2020, the NBH launched the FGS Go construction, which is part of the FGS Program. The limit of the new program was set by the Monetary Council at HUF 1,500 billion. On 17 November 2020, the Monetary Council decided to increase the limit of the program by HUF 1,000 billion to HUF 2,500 billion.

Under the Program the NBH provides refinancing loans to credit institutions, at 0 per cent interest rate and with a maximum maturity of 20 years (in case of specified working capital loans and subsidy pre-financing loans, the maturity of the refinancing loans can be maximum 3 years), which are lent further by the credit institutions to the SMEs with a capped annual costs and they also refinance financial enterprises for the same purpose.

MKB Bank participated in all phases of the Scheme, and lent HUF 432,690 million loan to SME's since the beginning of the program, with an interest rate of 2.5% and EUR 56 million in course of the third phase. Until 31 December 2020, HUF 114,823 million was disbursed under the FGS Go construction. In the fourth quarter of 2019 the Bank has finished the acquisition of HUF 7,000 million Hungarian Development Bank's loan portfolio related to FGS at NBH.

The loans lent as part of FGS are measured at amortised cost at MKB Bank, however at initial recognition the difference between the carrying amount and the fair value of the loans and parallel of the NBH funds denominated in HUF was deferred to Other assets (HUF 18,194 million) and to Other liabilities (HUF 19,623 million), which is amortised to Profit and loss during the term of the loans. This difference was driven by the gap between the market interest rate and the subsidized rate.

The fair value of the loans denominated in HUF amounted to HUF 146,043 million as of 31 December 2020 (2019: HUF 86,541 million).

MKB Bank joined Market Loan Program - called PHP - on 19 January 2016 that is aimed at stimulating the banks' transition towards lending on market terms, and to continue to encourage banks to grant loans to SMEs. At the same time, the NBH also started to phase out the NHP III program.

MKB Bank undertook a HUF 25 billion growth in the net volume of SME lending in 2016 concerning Market-based Lending Scheme (PHP), which increased by HUF 5 billion in 2017 in the framework of the second phase of PHP. Therefore MKB concluded HIRS transactions with NBH in a total amount of HUF 120 billion.

40. Events after the end of the reporting period

On February 26, 2021 MKB Bank Nyrt. purchased 100% of shares of Első Értékpapírosítási Tanácsadó Zrt. from Budapest Stock Exchange Ltd. As a result of the transaction MKB Bank has become the sole shareholder of the Company.

The employment relationship of dr. András Csapó, the Deputy CEO for Legal, Corporate Governance, Group Management and Priority Deals and therefore his internal membership in the Board of Directors was terminated as of 3 March 2021 with mutual consent. The CEO of the Company appointed dr. Ilona Török as Head of the CEO's Cabinet in Deputy CEO position with the effect of the receipt of the relevant approval of the National Bank of Hungary.

MANAGEMENT REPORT
to the separate 2020 Financial Statements of
MKB Bank Nyrt. (Prepared under IFRS)

In 2020, the scope of activities of MKB Bank Nyrt. comprised the following sectors:

- **banking services**
- **finance and operating leases**
- **financial and investment services**
- **other loans**

MKB Bank's profit after taxation for 2020 under IFRS amounted to HUF 6,232 million gain.

Shareholders' equity was HUF 202,974 million at 2020 year-end.

Budapest, 30 March 2021


dr Zsolt Bartha
Chairman and Chief Executive Officer


János Nyemcsok
Deputy Chief Executive Officer

MANAGEMENT'S DISCUSSION & ANALYSIS

The following section of the Annual Report provides a discussion and analysis of the Bank's financial condition and results of operations so as to help the reader to assess any changes in the financial condition and profits for the year 2020. The forthcoming analyses are based on figures reported in the Bank's separate financial statements prepared in accordance with International Financial Reporting Standards as adopted by the EU ("IFRS") as at, and for the financial year ended 31 December 2020 and audited by Deloitte Könyvvizsgáló és Tanácsadó Kft. chartered accountants. On this basis, the discussion focuses on the performance of the Bank. The separate financial statements prepared in accordance with IFRS are presented separately.

OPERATING ENVIRONMENT

International macroeconomic environment

Although optimistic expectations were observed in early 2020, the COVID-19 outbreak caused a sudden shock in the global economy: due to the nature of the pandemic, the treatment method was the partial or complete shutdown of economies. The world's economies suffered a significant, in many cases record decline in Q2 2020 (e.g. euro area: -14.7%, US: -9.0%, yoy). After the recovery in Q3, the second (autumn-winter) wave of epidemics led to a decline in performance of the world economic in Q4, although not to the same extent as in the spring.

Governments around the world have provided fiscal stimulus, while central banks (e.g. ECB, Fed) have supported economies during the pandemic with asset purchases and lower interest rates, which provided significant support to the prices of financial assets. At the end of the year, the appearance of vaccinations also increased optimism among economic, financial and capital market participants.

In addition to the COVID-19 pandemic, the critical issue of the 2020 year was the UK's exit from the European Union. The Brexit Agreement was concluded on 24 December, creating a free trade agreement between the parties based on duty- and quota-free access. The United Kingdom withdrew from the EU at the end of 2020.

Another highlight of 2020 was the US presidential election, where Democratic candidate Joe Biden won the presidency. In addition to the House of Representatives, Democrats also have a majority in the Senate, giving the new president a much greater opportunity to carry out his programs.

Hungarian macroeconomic environment

The COVID-19 pandemic and the accompanying restrictive measures have driven domestic economic performance. The domestic economy fell by 13.6% (y/y) in Q2 2020. The economic reopening and recovery after the spring epidemic was also reflected in Q3 data, with growth of 11.4% on a quarterly basis (yoy: -4.6%). The Q4 performance was marked by the second, autumn wave of the epidemic (-3.7%, raw data, y/y). Overall, domestic GDP fell by 5.0% in 2020 compared to 2019. Danube Capital's Quarterly Macroeconomic Outlook for December 2020 projected a 4.5% economic growth in Hungary for 2021.

The situation caused by the COVID-19 pandemic, deteriorating economic performance, weaker tax revenues, and government rescue packages have led to a surge in the general government deficit. As a result, gross government debt as a share of GDP also increased, reaching 81% by the end of 2020 (end of 2019: 65.5%).

Inflation dynamics were also driven by the pandemic in 2020. However, after figures above 4% at the beginning of the year the indicator remained between 2-4% for the rest of the year. Inflation averaged 3.3% in 2020. Meanwhile, internal price pressures remained high, with core inflation averaging 4.1% on an annual basis. Looking ahead, Danube Capital forecasted in December 2020 that in 2021 the domestic headline inflation rate may slow to 3.1% while core inflation may slow to 3.6%.

The MNB has introduced several old and new monetary policy instruments to mitigate the economic effects of the pandemic. Key steps: one-week commercial bank deposit facility was relaunched, the central bank initiated and maintained a government securities and mortgage bond purchase program, started a long-term secured loan program, expanded the Funding for Growth Scheme (FGS) and introduced adjustments for the Bond Funding for Growth Scheme. Furthermore, the MNB reduced the central bank base rate from 0.90% to 0.60% in two steps during the summer of 2020.

Yields were virtually unchanged in the Hungarian government securities market until the beginning of the COVID-19 pandemic. Following the announcement of the emergency, there was a larger increase in yields, followed by a significant drop in yields in Q2 (due to the MNB's programs and the improvement in global sentiment): the 10-year domestic government securities yield essentially closed 2020 at the level of the beginning of the year, but meanwhile showed significant fluctuations (between 1.8-3.3%).

Overview of the banking sector¹

2020 was the year of COVID-19, which resulted in accelerated digitalization, state-subsidized credit programs and a payment moratorium in the banking sector. In March 2020, the COVID-19 epidemic also required banks to adjust their business operations in a couple of days, for which they have not been prepared in advance. A change in customer needs and life situations, put pressure on customers and employees, too. Many banks have introduced home office and only the most necessary employees were allowed to work in the office considering health aspects. As a result of the pandemic, almost everything has shifted to the digital space; hence, digitalisation developments have accelerated in the financial sector as well, and banks have strengthened their online services and internal processes one by one.

However, this crisis is different from 2008, as banks were now much more prepared financially. They have met the challenges by the coronavirus epidemic with strengthened capital positions. Banks played an important role in stimulating the economy in 2020 through government-subsidized loans (NHP Hajrá, Exim Compensation Loan, Széchenyi Card Program, MFB Crisis Program) and by paying the one-off special tax. In terms of banking sector results, the year was characterized by rising operating income and rising costs and significant provisioning / impairment.

According to the preliminary, prudential data of the Hungarian National Bank, the net profit measured in 2020 was HUF 390 billion, which means a decrease of almost 44 percent compared to 2019. The interest income increased by 10.4%, while fee and commission income grew by 1.4%, due to the expanding HUF 60,609 billion (+ 22.5%) assets and exchange rate effects. The loan portfolio increased by 22.7 percent and deposits by 25.3 percent compared to the 2019 audited data. During the year, due to the economic impact of the coronavirus epidemic and the repayment moratorium it was a major impairment and loan loss provisioning, which increased nearly threefold, HUF 399 billion in 2020 compared to HUF 103 billion in 2019. Operating expenses show an increase of 6.3 percent based on preliminary

¹ Source: NBH

data for 2020, which is the result of potential cost reductions from home office and health measures due to the pandemic, as well as cost scheduled due to significant digital developments.

In terms of digitalisation, perhaps the timing was essential considering the introduction of the instant payment system during the spring that created a new era. This generated opportunities for several pioneering developments throughout the year. These include payment requests and QR code payments, but also required significant resources to prepare for the introduction of strict customer authentication related to the PSD2 directives. New mobile applications and mobile payment solutions became available, but video banking services and appointment booking systems also appeared. The range of products can be ordered online has also expanded, which are also increasingly accepted by customers.

PERFORMANCE OF THE BANK IN 2020

The Bank (separate) IFRS total assets – increasing with more than a thousand billion HUF or 57.6% – amounted to HUF 2,792.6 billion at the end of 2020. The portfolio of customer loans increased by 19.7% to HUF 1,106.2 billion, while customer deposits rose by 51.7% to HUF 1,877.4 billion. MKB Bank's profitability in 2020 was under pressure from the economic downturn caused by COVID-19: profit after tax fell to HUF 6.2 billion after last year's profit of HUF 42.0 billion.

The Bank's financial and business fundamentals, including capitalisation, liquidity, funding structure, balance sheet structure and the performance of its business lines, are stable.

PERFORMANCE OF THE INDIVIDUAL BUSINESS LINES²

Retail segment

In 2020, the pandemic situation changed the customers' previous expectations and habits in a high number of areas; under the changed circumstances, greater emphasis than before was placed in Retail sales on expert consulting and support provided to customers, be it liquidity management, crisis loans, a moratorium or digital solutions providing remote access.

The Bank continued the developments started earlier, which focus on quality customer service, customer experience enhancement, lending and the premium segment, thus further increasing the market share of MKB Bank's Retail Business Line even under the circumstances changed due to the pandemic.

MKB achieved outstanding results in the area of increasing the number of customers in the premium segment and their managed assets due to the fact that customer contacts with focused, elaborated value proposals and the development of a premium consulting system providing greater added value continued also in 2020. As a result, the business line achieved more than 50% growth in the number of Premium customers and 41% in managed assets. Due to sample portfolio-based investment consulting, the portfolio of open-end investment funds of MKB-Pannónia Alapkezelő Zrt. increased by 17% in the premium segment, further increasing the diversification of its customers' investments.

In the area of retail lending, the Bank also performed better than planned in mortgage and Prenatal (*Babaváró*) loans and, as an important step in consumer lending, a personal loan

² Source: NBH, KAVOSZ, Eximbank, MFB, MKB's own calculation

product that can be applied for also online was introduced, with an offer for a specific loan amount after pre-qualification by the Bank.

In 2020, special emphasis was placed on the full service and support of customers in the small business segment. The Bank offers its customers a number of solutions that help them with their day-to-day banking, liquidity management and foreign exchange transactions, all this with a focus on the circumstances created by the pandemic. MKB Bank was among the first to introduce a wide range of new subsidised loans, the favourable reception of which is also demonstrated by the loan volumes placed in the segment.

Despite the difficulties caused by the pandemic situation, the Bank remained committed to carrying out developments that enable it to greatly increase its customers' sense of comfort and security.

The Bank completed the transition to the Immediate Payment System by the deadline, and banking operations have been smooth ever since. The Bank's customers received the available additional services positively. One third of the transactions qualifying as immediate payment were initiated and executed outside working hours.

Loan repayment moratorium was implemented in the second quarter. Moratorium participation at the end of 2020 was 49.95% of total retail exposures.

Back in the second quarter of 2020, the Bank started the development of a digital customer queue management call system in its branch network, which enables customers to take queuing numbers and to make appointments online, thus minimising waiting times at the branch, avoiding possible queuing and waiting there. The extension of the new customer call service to the entire branch network was completed in the first quarter of 2021, thus enabling customers at all branches to take queuing numbers and to make appointments remotely.

The Bank drew the attention of customers to the possibility of using alternative channels, and a number of information leaflets were prepared to facilitate the use of electronic channels. The VideoBank service was launched, which allows customers, after their remote identification, to use a number of services without visiting the branch, be it retail transactions, opening a securities account or handling matters involving small business cards.

From the end of the first quarter of 2020, the activities of the branch network were greatly affected by the international and national health emergency arising in connection with the pandemic. In order to protect customers and employees, the branch network operated in compliance with the conditions of safe and responsible customer service at the branches throughout the year, in accordance with the then-current government measures and regulations. In addition to the still wide-ranging and continuously expanding options allowing customers to handle their matters online, MKB Bank continues to provide personal customer service at 51 branches nationwide.

MKB Bank's branch network development strategy is based on the continuous improvement of the standard of customer service, in which providing an as efficient and convenient customer service as possible plays a key role. Adapting to market conditions and the pandemic situation, the Bank continued to modernise and renovate its branch customer service areas in 2020. As a result, the full renovation of the Szent István tér Branch was completed, creating a Premium customer centre, which also presents the most advanced digital facilities and provides outstanding customer experience.

Aiming at a high level of customer service, branch network training was transformed and expanded in 2020. Both training aimed to develop sales and soft skills and segment-specific training became available online for the branch network staff. Also, adapting to the current

pandemic situation, the on-site sales support in the branch network was placed on a new footing. A comprehensive and full sales dynamisation programme was introduced to increase the quality of customer service and to enhance customer experience.

In 2020, similarly to previous years, the strategic cooperation between MKB Bank and CIG Pannónia Insurers continued, so pension, investment, risk and health insurance products were available in the Bank's branch network, enabling customers to diversify their investment portfolios. Due to the economic effects of the pandemic, 2020 was also a special year in insurance sales. In the case of regular premium life insurance, the Bank achieved 70% of its performance in the previous year and 119% in the case of single premium products. The Euro-based Gravis Single Premium Life Insurance introduced in April 2020 efficiently contributed to the latter result.

On 1 December 2020, CIG Pannónia Életbiztosító Nyrt. introduced its new service, Pannónia SelfID, which made remote identification and digital signature possible in the sales process. The service aimed to create fast, convenient, location-independent sales, thereby improving both the efficiency and regulated operation of insurance sales and the continuous enhancement of customer experience, making completely paperless, digital customer service available.

In the sale of home insurance, the *OKÉ* (Home, Garden and Value) product of Aegon Magyarország Általános Biztosító Zrt. is still available in MKB Bank's branch network. Furthermore, taking out insurance online on MKB Bank's website became possible, so customers can take out home insurance conveniently, without visiting a branch.

The brokerage sales channel was able to achieve significant development in 2020 in both retail and small business sales compared to the previous year. Sales through cooperation with our partners also increased in absolute value and in proportion to the branch network.

On the retail side, the temporary decline in the second quarter associated with the pandemic was not only compensated for in the rest of the year, but was also exceeded. In the case of retail mortgage loans, the volume of brokerage transactions exceeded 42%.

On the small business side, the demand for soft loans introduced by the government to stimulate the economy and to save jobs increased perceptibly, with brokers catalysing the process, the result of which was also reflected in the volume of loans disbursed. The achievement of the results was facilitated by the measures that put online solutions at the forefront of partner communication and administration as well and reduced personal meetings to the most necessary level.

Efforts to improve cooperation with our partners in 2020 proved successful; therefore, MKB Bank plans to continue the developments launched in order to be able to further increase its share in the brokerage market.

Digital products and channels

The implementation of the digital strategy and the digital transformation of the customer experience continued also in 2020, in which MKB's primary goal was to enhance customer experience, to introduce new digital products and to expand cooperation with its partners. It managed to appear with a new function on every channel and a new alternative channel was also introduced, and the Bank also took a big step in the area of digital sales. The pandemic situation significantly transformed consumer habits, also diverted customers who were less receptive previously to handle their matters digitally to the digital channel, further increased the number of active users of the channels and also accelerated our digital developments. The Bank strives for harmonising the channels, developing service packages that provide real value creation and their integration into the customers' lives.

At the beginning of 2020, the VideoBank service available to retail and corporate customers, where they can use the service after video chat identification, was introduced at record speed. Among other things, MKB VideoBank also provides assistance in opening securities accounts, applying for a SZÉP Card, advising small businesses, pre-filtering loans and handling matters related to day-to-day banking, and the range of services is continuously expanding.

The number of users of the MKB Mobile Application increased by more than 20%, customers actively use it in their day-to-day banking, and the possibility of applying for a pre-qualified personal loan in the mobile application was launched. Due to the development, pre-qualified customers using MKB's mobile application can access a pre-assessed loan amount of up to HUF 2 million with a few clicks, using their smartphone. During the development, customers were involved with the help of the Bank Group's innovation centre, MKB Fintechlab, in order to provide customers with a digital solution that is actually adapted to their own user needs. The development of the service, in order to further enhance customer experience, will also continue based on customer feedback. In addition, the Apple Pay service became available in September for all bank cards issued by MKB Bank – for the first time in Hungary for the Széchenyi Card, too.

The Bank completed the transition to the Immediate Payment System by the deadline, and banking operations have been smooth ever since. The Bank's customers received the available additional services positively. One third of the transactions qualifying as immediate payment were initiated and executed outside working hours.

The Bank also introduced new features in the area of digitisation in the branch service; a digital customer call system was introduced, which enables customers to take queuing numbers and to make appointments online, thus allowing the minimisation of waiting times at the branch, which significantly enhanced customer experience during the pandemic.

In addition to the digital developments providing remote service, the ATM network was renewed: the Bank replaced the previous devices with touchscreen, modern machines, which provide premium experience.

In addition to digital developments, it is to be pointed out that the Bank's digital capabilities also developed significantly, and the role of design thinking, UX design and agile product development grew rapidly. These methodologies and capabilities are essential to actively engage customers already in the research, design and market launch of products and services and to enable the Bank to respond quickly to the growing challenges of the digital world.

MKB SZÉP Card

The operation of the MKB SZÉP Card in 2020 was fundamentally determined by the spread of the COVID-19 virus and the government measures taken to curb it: in order to encourage SZÉP Card-based employer benefits, employers have been exempted from paying social contribution tax since 22 April 2020 (until 30 June 2021); the restrictive measures taken to protect health significantly reduced SZÉP Card usage in April and May and at the end of the year. However, between the two emergency periods (in July and August), MKB SZÉP Card usage rose to record highs.

Within the use of SZÉP Cards, the weight of online payment increased significantly in 2020, and since October 2020 it has also been possible to open an MKB SZÉP Card account online using the MKB VideoBank service.

All in all, the MKB SZÉP Card achieved outstanding results in 2020, too; almost all parameters of the product exceeded those in 2019: 227,000 MKB SZÉP Cardholders received

nearly HUF 28.6 billion in employer benefits in 2020 through 1.5 million transactions, and SZÉP Cardholders spent nearly HUF 23.6 billion in 2020 through 5.3 million transactions. Cardholders financed 71% of their SZÉP Card expenses from the catering pocket, 19% from the accommodation pocket and 10% from the leisure pocket.

The assets on MKB SZÉP Card accounts approached HUF 14.8 billion on average over the year. Cardholders can now use their cards to pay at as many as 28,000 acceptance points.

Corporate and institutional customers

Based on its traditional strengths, MKB's ongoing strategic goal is to maintain a strong corporate business line. The business line focuses on local knowledge, professional service, consulting-based sales and the provision of innovative solutions.

MKB does not simply sell products to its customers, but provides comprehensive business solutions and advice, sets up comprehensive loan schemes if necessary and meets special banking needs. MKB is able to provide efficient solutions to all players in the corporate segment, regardless of customer size.

In order to further develop the customer lifecycle-based approach, the Bank devoted significant resources also in 2020 to further optimising product development processes and models, including allocating extra resources to strengthen digitisation solutions in response to the challenge posed by the pandemic.

Business demand for loans declined in the initial stage of the pandemic and then it gradually began increasing in the second half of the year. MKB smoothly introduced the various new subsidised and refinanced loans and surety programmes included in the economic stimulus package. Interest in the new schemes was continuously growing. They have been very popular since their introduction, with a significant willingness to borrow, which firstly gives a boost to the economy and secondly also helps the survival of companies in difficulty. In the MNB's NHP Hajrá Programme, the Bank managed to achieve an outstanding market share of 8.8%.

Loan repayment moratorium was quickly implemented in the second quarter to ease off pressure on customers' liquidity and profitability. Moratorium participation at the end of 2020 was 27.91% of total corporate exposures.

Retaining portfolios remains one of MKB's top priorities, with maintaining its strong market positions and a diversified loan portfolio and avoiding the build-up of considerable risk, industry or customer concentration.

The Bank considered its small and medium-sized enterprise (SME) customer base as a key segment also in 2020, in which increasing product penetration was a priority task.

Strong customer base of MKB Group allowed for rapid customer deposit increase. Non-financial corporate deposit volume increased 21.9% p/p, to HUF 943.7 billion (HUF +169.7 billion p/p), while market share increased 61 bps p/p to 7.8%.

MKB Bank is still an active participant in the Széchenyi Programme. In 2020, the portfolio placed by the Bank under the Széchenyi Programme was HUF 38.2 billion, which represents a market share of 7.0%.

The Bank has traditionally maintained close cooperation with Eximbank in order to enable as many customers as possible to benefit from their financing sources. In terms of the performance of the Hungarian economy, foreign trade is a top priority, since nearly 90% of the GDP comes from exports, to which not only exporters, but also suppliers organised around exports and companies only now appearing on the export market also contribute. The Bank is particularly proud to have been awarded the 'SME Financier of the Year 2019' recognition in

2020 for supporting representatives of the SME sector with EXIM loans and for the highest funding volume disbursed to the SME segment in 2019. MKB's market share for Exim products was outstanding at 9.3%.

Investment services

In order to serve customer needs at a higher level, in 2020 the Bank continued to further expand the range of investment funds it offered. The result of joint work with MKB-Pannónia Alapkezelő Zrt., considered a strategic partner, is that the 'New World Fund Family' was launched, which wishes to respond to today's investment needs. During the year, the Bank entered into a strategic agreement with Diófa Alapkezelő Zrt., which aims to make a wider range of investment opportunities in the domestic property market available to MKB's customers.

Of course, COVID-19 also had a strong impact on the performance of investment products, but it can be said that the losses incurred at the beginning of the year were eliminated by the end of the year and most funds closed 2020 with a positive performance for the whole year.

Also in view of the ongoing situation due to COVID-19, the Bank was continuously expanding the range of services that can also be accessed without a personal meeting. One of the important stages of this is that Customers can now open a securities account through the VideoBank service introduced during the year.

In addition to sales in investment funds, the sale of Retail Government Securities and certificates was also outstanding during 2020.

MKB's Capital Markets and Transaction Consulting function was one of the key investment service providers of the Growth Bond Programme (NKP) also in 2020: it participated in five successful bond issues, the total value of which reached HUF 46.5 billion. In addition, it also participated in the preparation and execution of additional transactions and continued to act as a Designated Adviser on the Xtend market of the Budapest Stock Exchange.

Private Banking

MKB Private Banking was able to increase its portfolio of managed assets by around over 5% also in 2020. In terms of the volume of managed assets per customer, its business line is still the market leader among domestic service providers and won the first place at the Private Banking Hungary award ceremony in this category. In addition to this recognition, MKB Private Banking also earned the Business Line Developer of the Year award due to its still market-leading bank card portfolio, the development of its investment consulting activities and the professional training of its consulting staff. A staff member of MKB's Private Banking business line also earned the Junior Private Banker of the Year award. MKB's product development did not stop, and a new, internationally highly recognised partner joined its structured bond distribution.

COVID-19 created unprecedented business conditions, in which MKB Private Banking was able to cope. At the beginning of the second quarter, the operation of MKB and all its services were completely switched to smooth telework, from which a flexible return to office work is also possible if necessary. Of course, customer portfolios were affected by extraordinary price movements, but due to the typically long-term investment horizons, the Bank did not change the compositions significantly. The total risk exposure of the portfolios increased moderately in the second quarter (and remained at a higher level until the end of the year) due to attractive entry opportunities for certain products. The number of MKB Private Banking customers is stable, having increased slightly during the year.

SUBSIDIARIES / STRATEGIC ARRANGEMENTS AND PARTNERS

The range of MKB's own banking products and services is supplemented by those provided by its subsidiaries and partners. The key objectives include maintaining or enhancing the market positions of the subsidiaries engaged in business activities, increasing cooperation among the members of the Group and strengthening the auxiliary financial services.

SUBSIDIARIES³

MKB Euroleasing Group

As one of the leading domestic leasing companies, the MKB-Euroleasing Group was not only able to remain an outstandingly active player, but was also able to finance its customers to an extent greater than the pre-planned sales volume in the extremely difficult year 2020.

The MKB-Euroleasing Group continued to achieve an outstanding market share, mainly in the area of motor vehicle and agricultural machinery financing, as in previous years, but in addition to these segments, it also provides a full range of services to its customers in the area of large commercial vehicle and general machinery financing.

The goal of the MKB-Euroleasing Group is to build a portfolio that is diversified in terms of both risk and business, taking into account both the financing segments and the portfolio of contracts built within the segments. This strategy can ensure stable, low-risk and profitable operations in the long run.

The MKB-Euroleasing Group was able to increase the size of the portfolio under its management also in 2020, which greatly contributes to the further improvement of operational efficiency.

The strategic goal of the MKB-Euroleasing Group remains to further strengthen its market share achieved and its status as a leading domestic leasing company. Its stable market presence is due, in addition to the continuous development of the existing trader and importer relations, to the establishment of new ones. Furthermore, the Group wishes to remain a leading player also in the development and introduction of innovative digital solutions in the future as well, in terms of serving both its customers and partners.

MKB Consulting

Transformed into a private limited company in 2020, MKB Consulting was at the service of its corporate, public administration and higher education customers with a comprehensive consulting portfolio, despite COVID-19. It provided advice to businesses primarily on the preparation and implementation of investment and innovation and R&D projects.

One of the main focuses in 2020 was the digitisation of operational processes. As a result of the COVID-19 global pandemic, customer relations were also maintained at Consulting through digital channels, electronic signatures were introduced and, in addition, the digital transformation of a number of processes was also implemented.

³ Source: Hungarian Leasing Association, BAMOSZ

In addition to digitisation, MKB Consulting also carried out significant developments in respect of human resources: several expert staff joined the agricultural and food industry function, which is expected to play an even bigger role in 2021. As a result of fundraising advice provided to cities of county rank and various capital fund management companies, programmes that generate a significant wave of development in some rural regions and certain sectors could be launched.

MKB Consulting also closed successful projects in 2020 within its operational development consulting activities based on its CELONIS process optimisation software and, in addition, at the end of the year it was also awarded a grant of HUF 133 million for the implementation of a digital product development project.

MKB Consulting starts 2021 with expanded consulting services and a strengthened team of experts, as well as digital processes that are in line with the needs of the 21st century.

MKB-Pannónia Alapkezelő Zrt. - MKB-Pannónia Fund Management

In 2020, the epidemic situation caused by COVID-19 was decisive in the activities of MKB-Pannónia Alapkezelő Zrt. both on the operational and investment side. On the operational side, there was no any disruption due to the quick response, and on the investment side, the Fund Management reacted extremely successfully to market events. As a result, MKB-Pannónia achieved record business results in 2020 that exceeded all previous years.

On the product development side, MKB-Pannónia has launched two new ESG funds to meet growing demands. In 2020, the documentation of investment funds was standardized and the new registration system was implemented. The establishment of a real estate fund management business line has started in the second half of the year. As a result, MKB-Pannónia's first real estate investment fund will be launched in April 2021.

On 31 December 2020, the Fund Management managed a total net investment of HUF 609 billion, which means a 7% market share. Within this, it manages the investments of HUF 197 billion in 38 mutual funds, 76 thousand clients, and within the portfolio management it manages investments totalling HUF 412 billion for 9 funds, 3 insurance companies and 4 other clients. MKB-Pannónia Fund Management is the second in the ranking of pension fund asset managers (in terms of assets under management).

Danube Capital R&A Zrt.

During 2019, a dedicated competence in economic analysis and market research was established within the MKB Financial Group with the establishment of Danube Capital R&A Zrt. In addition to its analysis activities, it assists company managers and owners in making business decisions with regular professional publications. During 2020, Danube Capital published 182 professional blog posts, which generated 56,000 views in total. During more than a year of operation, Danube Capital's professional team supported the customers of MKB Financial Group with comprehensive company valuation, sectoral and macroeconomic analyses as well as market research and consulting.

MKB Inkubátor Kft. - MKB Fintechlab

The year 2020 played a key role in the life and development of MKB Fintechlab. As part of the digital business development function, MKB Fintechlab greatly contributes to the adoption of the Bank's digital capabilities and is responsible for integrating the planning and design

approach, consciously developing innovation maturity, and exploiting its inherent business potential.

The three pillars of MKB Fintechlab's strategy are the investment function, the digital and design competence centre and innovation management capability.

MKB Fintechlab has a total of 28 startup companies in its investment portfolio, and MKB Fintechlab plans to invest in an additional 10 startup companies in the next 2 years.

Continuing the scaling of the unique banking design and digital competence centre, it supported the digital transformation of the Bank and the Bank Group with nearly 20 specialists by the end of the year. The specialists include transformation experts, digital product designers, service designers and digital performance optimisation specialists.

Despite COVID-19, MKB Fintechlab organised several international innovation events in 2020, including a hackathon co-organised with Corvinus University and MKB Digital Zrt. or the now 2-day international banking digital transformation and design online conference involving nearly 500 people in total, i.e. the Fintechlab Design Summit.

The company will continue its innovation work also in 2021, thus supporting the digital transition of not only MKB Bank, but also the entire domestic financial sector.

Solus Capital Venture Capital Fund Manager

In 2020 Solus Capital Venture Capital Fund Manager has managed two venture capital funds (Solus I and Solus II Venture Capital Fund) with nearly HUF 21.4 billion in registered capital, making it a key player in the venture capital market. The Funds are jointly involving EU and private sources, for which the EU source is provided by MFB Bank as the fund of funds.

Solus I Venture Capital Fund seeks to contribute to regional development and the technological modernization of the SME sector under the S3 Venture Capital Program. The Capital Fund invests in small and medium-sized enterprises that are capable of rapid growth through innovation in the field of smart technology. Solus I Venture Capital Fund currently has a portfolio of 28 companies. The Fund has already invested nearly HUF 6.8 billion in various manufacturing and service industries.

Solus II. Venture Capital Fund launched active capital investment activities at the end of 2019, aims to support the strategic goals of the Digital Success Program (DJP): to assist the development of digital infrastructure, competencies and the digital economy through venture capital investments. Solus II. Venture Capital Fund invests in micro, small and medium-sized companies whose development goals are related to the strategic goals of DJP, such as education (EdTech), government services (GovTech), health and welfare services (MedTech, SportsTech), various sectors of the digital economy (AgTech, E-commerce, Sharing Economy), information security (Cybersecurity) and the latest innovations (5G developments and related innovations).

The first investment was made in 2020, the portfolio currently consists of 11 companies, and the Board of Directors of Solus Capital Zrt. has already decided on a total of 3.6 billion investment.

For both Funds, Solus Capital has met and exceeded its commitment to the total value of Initial Primary Sources and Additional Primary Investments as decided by the Board of Directors in line with the 2020 targets.

In the fall of 2020, Solus I Venture Capital Fund completed its first successful exit. The Fund invested in Medicorp Hungary Zrt. in 2018, the company operates in the MedTech industry.

STRATEGIC COOPERATION ARRANGEMENTS AND PARTNERS⁴

MKB Pension Fund

The Voluntary Branch of the MKB Pension Fund offers a decades-long, efficient savings tool to its nearly 77,500 customers within the MKB Group's full range of investment solutions. The simple, interest tax-free product, which can be used in many ways even in the active years, can be tailored to the return expectations and risk-bearing capacity of the Fund Members. In addition to member and employer contributions, the savings are also increased by a 20% tax allowance, which can be applied to personal income tax up to HUF 150,000 per year, which can be achieved by contributing HUF 750,000. Customers investing in their future with the MKB Pension Fund can take advantage of the combined benefits of impressive above-inflation yields even over 10 and 15 years and low cost levels due to expert asset management. The funds can be used through a flexible range of services.

On 31 December 2020, the HUF 139.6 billion assets of the Fund increased by HUF 1.4 billion year on year. With this, the Fund outperformed its financial plans for 2020 even under the more difficult market conditions due to the COVID-19 pandemic. A positive result of the year is that the individuals' conscious willingness to save is gaining weight in terms of the individual members' contribution activity. In addition, it revived its role as an employer by supporting its employees' retirement savings.

The Private Branch of the MKB Pension Fund closed last year with 3,639 members and HUF 20.5 billion in assets, while the proportion of members paying membership fees remained well above the 70% minimum statutory requirement.

The MKB Pension Fund is one of Hungary's market-leading funds. Its continuous stable and prudent operation for more than 25 years has been supported by well-prepared fund and asset management professional support and dynamically increasing digital developments since 2020. Among the targeted developments of customer service, the extension of e-administration with authentic electronic signatures, the development of a Member Portal and the implementation of a website renewal project were completed last year, resulting in the further enhancement of user experience as a goal achieved from 2021 onwards. Last year, the complete due diligence of internal administrative processes was also carried out in favour of increasing efficiency and streamlining the process that can be implemented. In addition, the focus of business development was on continuous activity, customer reach, and studying and incorporating other new and innovative solutions in order to continuously increase customer satisfaction.

MKB-Pannónia Health and Mutual Benefit Fund

The MKB-Pannónia Health and Mutual Benefit Fund is one of the market-leading health funds in Hungary, providing a wide range of services to more than 205,000 members and having had total assets of HUF 15.3 billion as at 31 December 2020. Adapting quickly and efficiently to the changed environment, the Fund also outperformed its financial plans for 2020 in a turbulent environment resulting from the effects of the COVID-19 pandemic. The positive results of the year were that the Fund closed the year with an increasingly dynamic Member contribution activity, addressing its Members with good sense due to its strengthened business approach. In addition, responding to growing health awareness, it also developed a product with an external partner and successfully introduced a new health insurance product, which can be financed through the Fund, at the end of 2020.

⁴ Source: Association of Mutual Funds

From 2020, as a result of dynamic digitisation developments, electronic administration was expanded, the Fund enabled the submission and settlement of scanned product purchase invoices, and created a document upload interface to increase the convenience of e-administration with authentic electronic signatures. In addition to the continuous development of its IT infrastructure, it also renewed its website, so starting in 2021 it will help its members seek information on a web platform that complies with modern UI and UX guidelines. The full due diligence of internal cash administration processes in 2020 is expected to increase organisational efficiency, enabling even smoother customer service. The operation of the Fund was stable and predictable also during 2020, exploring a number of additional new and innovative solutions to continuously increase customer satisfaction.

For its customers, the name of the MKB-Pannónia Health and Mutual Benefit Fund has been associated with the widest range of available health-supporting and cost-reducing services though the financial support of health awareness for nearly 25 years now. The assets of the Health Fund, which can be spent on the needs of the whole family in almost every life situation and can be accumulated with a 20% tax allowance, can be widely used, from having children to private health care expenses to supporting elderly care. In the case of expenses for prevention and a fixed-term deposit for 2 years, the state provides an additional 10% tax allowance to the Members, which can be spent on a wide variety of products and services at its 15,600 partners using traditional payment methods or at nearly 9,500 contracted card acceptance service providers using the elegant MKB Health Card with a look renewed by the end of 2020 and worthy of the MKB Brand.

FINANCIAL PERFORMANCE

Statement of Financial Position

Total assets of the Bank increased by 57.6%, compared to the end of 2019, and amounted to HUF 2,792,636 million as at 31 December 2020.

Cash reserves increased by HUF 238,795 million compared to the end of 2019: cash on hand grew by HUF 9,248 million, while the balance of the account held at National Bank of Hungary grew by HUF 229,547 million.

Loans and advances to banks increased by 33.9%, i.e. HUF 21,166 million compared to the end of 2019.

Derivative financial assets measured at fair value showed an increase, driven by HUF 5,069 million higher balances of derivative transactions.

Securities increased by 95.4%, i.e. HUF 573,133 million compared to prior year end. In 2020, the balance of Loans and advances to customers increased by 19.7% compared to the end of 2019, and amounted to HUF 1,106,242 million as at 31 December 2020.

The amount of Non-current assets held for sale and discontinued operations decreased by HUF 3,571 million compared to 2019 year-end.

Other assets increased by HUF 1,970 million at the end of 2020, mainly due to an increase in deferred expenses.

Investments in jointly controlled entities and associates increased by HUF 1,665 million comparing 2020 year-end to 2019.

During the reporting period Amounts due to other banks reflected an increase of 193.8%, i.e. HUF 379,142 million. Deposits and current accounts owed to customers grew by 51.7%, i.e. HUF 640,194 million in comparison with the volume as at 2019 year-end.

Among liabilities, Derivative financial liabilities decreased by 20.0%, i.e. by HUF 8,857 million, primarily due to fair value change of interest- and currency-related derivative transactions.

Other liabilities and provisions decreased by HUF 6,073 million or 10.0%, from 2019 year-end.

Statement of Profit or Loss and Other Comprehensive Income

In 2020, Net interest income showed a HUF 12,012 million decrease compared to the previous year mainly caused by increased interest expenses.

Net income from commissions and fees decreased by 13.3%, i.e. HUF 3,640 million in 2020 compared to the previous year, due to the decrease of other commission income.

The net balance of other operating income and expense showed a decrease of HUF 5,491 million, and amounted to HUF 6,121 million net income as at 31 December 2020.

Impairment and provisioning increased by HUF 11,231 million in the business year compared to the previous year, the Bank reported a total of HUF 7,204 million in net provisioning after the release of the net provision of HUF 4,027 million in the previous year. The significantly

higher provisioning was mainly due to the effects of the economic downturn due to COVID-19.

Operating expenses increased by HUF 2,012 million, mainly due to the HUF 3,135 million increase in IT related expenses.

Expense for Legal and advisory services contain the following other audit service fees for 2020:

2020	Amount in HUF
<i>Review of consolidated financial statements</i>	
Review of interim consolidated financial statements of MKB Bank Nyrt. and its subsidiaries based on the requirements of ISRE 2410	16 800 000 +VAT
<i>Engagement related to performing status of mortgage loans **</i>	
Assurance engagement relating to performing status of mortgage loans offered as coverage	2 449 500 +VAT
<i>Agreed upon procedure</i>	
Procedures related to bank indicators	800 000 +VAT
Other audit service fees*	20 049 500 +VAT

* Fixed fee per each service.

** Several services are completed during the year. Total amount represents fees accounted for all completed services during 2020.

Fees for audit services contain the following 2020:

2020	Amount in HUF
Audit fee of the Bank	109 800 000 +VAT
Total audit fee	109 800 000 +VAT

Based on above factors, MKB Bank's profit after taxation for 2020 amounted to HUF 6,232 million.

For the end of 2020, total other comprehensive income increased by HUF 6,468 million compared to the previous year and resulted in HUF 3,187 million profit due to higher revaluation on financial assets measured at FVTOCI.

CAPITAL MANAGEMENT

The Capital situation of MKB Bank was sufficient at the end of 2020. As a result of the 2020YE profit (and therefore core capital accumulation) and the increase of the subordinated debt stock the available core capital increased significantly. The owner of the MKB Bank is committed to maintain the bank's capital adequacy and implement all the necessary measures.

Domestic and international guidelines require the Bank to maintain certain minimum capital-to-asset ratios. These risk-based ratios are determined by allocating assets and specified off-balance sheet instruments into different weighted categories, with higher levels of capital being required for categories perceived as representing higher risk. Regulatory capital is divided into Tier 1 Capital and Tier 2 Capital. In addition to retained earnings, the Bank may raise regulatory capital by issuing several types of financial instruments to the public. These financial instruments are then classified as either Tier 1 or Tier 2, depending on the types of conditions or covenants they place upon the issuer.

As at 31 December 2020, as an actual figure of the Bank regulatory capital was HUF 207.9 billion based on Basel III IFRS under Supervisory Regulation. The increase of regulatory capital - by HUF 8.7 billion – is derived from the increase of profit and subordinated debt (repurchase in the amount of EUR 48.1 million and new issuance in the amount of EUR 51.3 million, as a result decrease of unused subordinated debt due to the maturity date), decrease of deduction of ESOP program and deferred tax and decrease of negative revaluation reserve, which was compensated by the increase of deduction of intangible assets and increase of negative AVA.

Risk-weighted assets including operational and market risk increased by 15.1% from HUF 782 billion in 2019 to HUF 899.7 billion besides approximately 10.5% weakening of domestic currency. The main part of the increase derived from the increase of business volumes and increase of market risk, which was compensated by the decrease of operational risk.

By application of capital management as a tool, the appropriate capital safety is a first priority decision making factor, therefore the Bank monitors the changes of the capital elements continuously.

Legal limits defined by the

Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (Banking Act),
Regulation (EU) No 575/2013 OF THE EUROPEAN PARLIAMENT on prudential requirements for credit institutions and investment firms and amending Regulation (CRR):

- CRR 395-400.§, Banking Act 302.§ large loan limit -> no excess
- Banking Act 100.§ investment limit -> no excess
- Banking Act 101-102.§ total investment limit -> no excess

INFORMATION RELATED TO SHARES AND OWNERS

The share capital (subscribed capital) of MKB Bank Nyrt. is HUF 100,000,000,000 i.e. one hundred billion forints, representing a cash contribution made available in total amount. The share capital is divided into 100,000,000 registered, dematerialized, series "A", ordinary shares with a nominal value of HUF 1,000 i.e. one thousand forints each. All Series "A" Ordinary Shares ("Ordinary Shares") bear the same rights and all Ordinary Shares were listed in the Budapest Stock Exchange Standard category on 30 May 2019. Each shareholder holds solely ordinary shares.

On 30 October 2020, the Bank has sold all of its shares representing 33.33% ownership in Magyar Bankholding Zrt. to its shareholders.

Magyar Bankholding Zrt. commenced its effective operation as a bankholding on 15 December 2020, after the bank shares of the key owners of Budapest Bank Zrt., MKB Bank Nyrt. and MTB Zrt. were transferred to the joint holding company in possession of the approval of National Bank of Hungary (hereinafter: NBH). The owners transferred their shares to Magyar Bankholding Zrt. as a result the second largest banking group in Hungary has been established, with the Hungarian State owning 30.35% of the shares through Corvinus Nemzetközi Befektetési Zrt., the previous direct owners of MKB acquiring 31.96% of the shares and the previous direct owners of MTB acquiring 37.69% of the shares. All required approval has been obtained for these changes. No significant change is expected in the strategy of the Bank.

The shareholder structure of MKB Bank is the following:

Shareholder structure of MKB Bank Nyrt.		
Name of shareholder	Number of shares (pieces)	Ownership share (%)
Magyar Bankholding Zrt.	97 185 008	97.19%
Free float	2 814 992	2.81%
Total:	100 000 000	100%

The parties have more than 10% indirect influence in MKB Bank Nyrt. are presented below, in line with the decisions of the National Bank of Hungary H-EN-I-15/2020., H-EN-I-704/2020. and H-EN-I-705/2020.

Magyar Bankholding Zrt. has a 97,19% direct ownership interest in MKB Bank. The ownership structure of Magyar Bankholding Zrt. is:

Ownership structure of Magyar Bankholding Zrt.	
Name of shareholder	Ownership share (%)
Corvinus Nemzetközi Befektetési Zrt.	30.35%
METIS Magántőkealap	11.51%
Blue Robin Investments S.C.A.	10.82%
RKOFIN Befektetési és Vagyonkezelő Kft.	4.48%
EIRENE Magántőkealap	3.29%
Pantherinae Pénzügyi Zrt.	1.02%
PRIME FINANCE Future Zrt.	0.84%
Magyar Takarékok Befektetési és	37.69%
Total:	100%

The following organisations have more than 10% indirect influence in MKB Bank Nyrt:

- Corvinus Nemzetközi Befektetési Zrt., Hungarian State
- METIS Magántőkealap, Opus Global Befektetési Alapkezelő Zrt.

- Blue Robin Investments SCA, Blue Robin Management S.à r.l., Uncia Finance Zrt., Uncia Alpha Kft., Uncia Private Equity Fund, QUARTZ Alapkezelő Zrt., Dry Immo Zrt., Felis Private Equity Fund
- Magyar Takarékbefektetési és Vagyongazdálkodási Zrt., ABRAHAM Goldman Zrt.

The Articles of Association of the Company do not restrict the transfer of shares representing the subscribed capital of MKB Bank Nyrt. The Company has no issued shares representing special controlling rights. Voting rights are not restricted at MKB Bank Nyrt.

Rights and obligations of the shareholders

Rights of the shareholders at the General Meeting

- a) The shareholder is entitled to attend the General Meeting. The shareholder, or a shareholder's proxy as defined in Section 151-155 of the Capital Market Act, who - as a result of the shareholders registration - was registered in the Register of Shares on the second business day preceding the start of the General Meeting, the latest, may attend the General Meeting of the Company. Persons, whose name is included in the Register of Shares at the time, when the Register of Shares is closed, shall be entitled to exercise the shareholder's rights at the General Meeting. The day of closing the Register of Shares is the second business day preceding the starting day of the General Meeting.
- b) The shareholder may also exercise his/her rights at the General Meeting by way of proxy. Internal member of the Board of Directors, member, chairman of the Supervisory Board and the auditor cannot be persons authorised by proxy. The shareholder may give a proxy to the external member of the Board of Directors or to a managing officer of the Company - if he/she is not an internal member of the Board of Directors. The proxy shall be valid for one General Meeting, or for the period specified in the proxy, a maximum of 12 months. The validity of the proxy shall cover the continuation of the suspended General Meeting or the General Meeting re-convened because of the lack of quorum. The proxy shall be drawn up in the form of a public document or a private document providing full evidence and it shall be submitted to the Company. The authorisation issued by the shareholder's proxy shall state that the representative is acting as shareholder's proxy.
- c) The shareholder has the right to be informed about cases on the agenda of the General Meeting. In line with which right, in reply to the written request of the shareholder submitted at least eight days before the day of the General Meeting the Board of Directors shall provide information necessary to discuss the agenda item of the General Meeting three days before the day of the General Meeting, the latest.
- d) The Company ensures that the rights to be informed, to comment and to suggest at the General Meeting are granted to every shareholder attending the General Meeting, on the condition that the exercising of these rights shall not hinder the lawful and proper operation of the General Meeting. In the interest of exercising the shareholder's rights specified in this present point the Chairman of the General Meeting shall grant the right of speech to the shareholder at the General Meeting, on the condition that the Chairman of the General Meeting may specify the duration of the speech, may withdraw the right to speak, especially in case the shareholder is off the point, furthermore he/she can specify the sequence of the speeches, if there are several speeches at the same time, in order to ensure the lawful and proper operation of the General Meeting.
- e) Voting rights attached to shares are determined by the nominal value of such shares. The shareholder cannot exercise his/her right to vote until he/she has performed his/her due cash contribution.

Minority rights

- a) Shareholders jointly representing at least 1% of the voting rights may request the convocation of the General Meeting at any time without specifying the reason or the purpose. If the Board of Directors fails to take action to convene the General Meeting for the earliest possible date within eight days after the receipt of the request, the registering court shall convene the meeting in reply to the application of the shareholders suggesting the meeting or the registering court shall authorise the suggesting shareholders to convene the meeting. The expected costs shall be advanced by the suggesting shareholders.
- b) If shareholders jointly representing at least 1% of the votes communicate a proposal to the Board of Directors to supplement the agenda in line with the rules of the levels of detail or a draft resolution concerning an item on the agenda or an item to be added to the agenda within eight days after the announcement of the convocation of the General Meeting is published, the Board of Directors shall publish an announcement about the supplemented agenda, the draft resolutions proposed by the shareholders after the communication of the proposal pursuant to THE Articles of Association. The issue specified in the announcement shall be deemed added to the agenda.
- c) If the General Meeting rejected or did not allow the submission to enforce a claim of the Company from any member, managing officer, member of the Supervisory Board or the auditor for a resolution to be adopted, shareholders representing at least 1% of the voting rights may enforce the claim themselves for the benefit of the Company and representing the Company within a thirty-day limitation period.
- d) If the General Meeting rejected or did not allow the submission to have the last report or an economic event or commitment related to the activity of the Board of Directors in the last two years audited by a specially commissioned auditor for a resolution, the registering court shall order the audit and appoint an auditor at the cost of the Company in reply to the application of the shareholders jointly representing at least 1% of the voting rights submitted within the thirty-day limitation period following the General Meeting. The registering court shall reject the fulfilment of the application if the submitting shareholders abuse the minority rights

Right to dividend

The shareholder shall be entitled to a dividend from the profit of the Company, which can be shared and which was ordered to be shared by the General Meeting in the proportion of the nominal value of his/her share.

Obligations of the shareholders

- a) The shareholder shall provide cash contribution to the Company in amount corresponding to the nominal or issue value of the shares received or quoted by his/her person. The shareholder may not be validly exempted from his/her obligation - excepting the case of share capital decrease.
- b) The shareholder with at least 1% share or the shareholder acquiring such share shall report his/her indirect share and its changes to the Company providing his/her details suitable for identification at the same time.

MKB Bank Nyrt. is not aware any agreement concluded between its owners that may result in restrictions on the transfer of issued securities and/or voting rights.

MKB Bank Nyrt. is not aware of any significant agreements to which the company is a party and which take effect, alter or terminate upon a change of control of the company following a takeover bid, and the effects thereof, except where their nature is such that their disclosure would be seriously prejudicial to the company; this exception shall not apply where the company is not obliged to disclose such information on the basis of other legal requirements.

Employee share scheme

With the modification of the ESOP Act, which came into effect on 28 November 2015, a new type of Employee Share Ownership Programme could be launched. MKB Bank was one of the first to use this opportunity to establish its own ESOP Organisation on 30 May 2016. The launch of the ESOP was closely linked to MKB Bank's reorganisation efforts, as it created ownership interest among its employees. MKB Bank currently runs two ESOP Remuneration Policies through its ESOP Organisation: the Investment ESOP Remuneration Policy and the ESOP Performance Remuneration Policy. The point of the investment ESOP is that the ESOP Organisation has purchased Issuer Ordinary Shares for investment purposes for the benefit of participating employees and senior executives. Employees who made a declaration of participation to the ESOP Organisation did not become the owners of the shares, the shares were owned by the ESOP Organisation and are also currently owned by the ESOP Organisation. Participating employees acquired membership stakes in the ESOP Organisation. Initially, ESOP stake in the Company was 15% of the Issuer's share capital, which has been terminated in the meantime due to the continued implementation of the investment ESOP Remuneration Policy, i.e., the sale of shares by ESOP Organisation. Following the fulfilment of the stated purpose or condition of the investment ESOP, participating employees or senior executives may claim the earnings per share.

* * *

As a public limited company, in accordance with market practice and the BSE Corporate Governance Recommendations (Recommendations), MKB Bank Nyrt. prepares a Corporate Governance Report, which shall be published on the website of the Company (www.mkb.hu). In its Corporate Governance Report, the Company presents its corporate governance practices for the financial year and, on the other hand, details its compliance with each section of the Recommendations.

SUPREME, EXECUTIVE AND MANAGEMENT ORGANS, SUPERVISORY BODY, COMPOSITION AND OPERATION OF COMMITTEES

General Meeting

The supreme body of the Company is the General Meeting. The General Meeting has the exclusive competence to approve and amend the Articles of Association, except for the modification of the Company's headquarters, premises, branches and, except for the core activity of the Company, the activities of the Company as the Board of Directors is entitled to amend the Articles of Association in that regard. Pursuant to the Articles of Association of MKB Bank Nyrt., the General Meeting of the Company has the exclusive competence to recall and elect the Chairman and members of the Board of Directors. Members of the Board of Directors shall be elected by the General Meeting for a definite term of maximum five years. The members of the Board of Directors may be re-elected and may be recalled at any time by the General Meeting without giving reasons, in accordance with the provisions of the Articles of Association.

Board of Directors:	Supervisory Board:	Audit Committee:
Chairman: dr. Balog Ádám*	Chair person: Hornung Ágnes	Chairman: Oszlányi Törtel András
Members: dr. Csapó András Benczédi Balázs dr. Gombai Gabriella Kardos Imre Takács Marcell Tamás Valkó Mihály	Members: dr. Ipacs László Oszlányi Törtel András Feodor Rita Nyemesok János Müller Ferenc Godena Albert	Members: dr. Ipacs László Feodor Rita

* Considering the resignation of dr. Ádám Balog, and in line with the resolutions of the Extraordinary General Meeting, dr. Zsolt Barna is the Chairman of the Board of Directors of MKB Bank Nyrt. from 1 January 2021

Board of Directors

The Board of Directors is the executive body of the Company. The members of the Board of Directors represent the Company vis-a-vis third parties and before court and other authorities. The Board of Directors shall develop and manage the work organisation of the Company.

The scope of authority of the Board of Directors is included in the Articles of Association of the Company with the proviso that within the framework of effective laws and resolutions adopted by the General Meeting, the Board of Directors shall be entitled to take any actions and make any decisions that do not form part of the exclusive powers of the General Meeting or the Supervisory Board. The decision on the acquisition or the sale of own shares, as well as the increase of the registered capital through the issue of shares belongs to the competence of the General Meeting subject to the condition that the General Meeting may authorize the Board of Directors to decide on registered capital increase.

Supervisory Board

The Supervisory Board shall control the management of the Company in order to protect the interests of MKB Bank Nyrt.

Audit Committee

The Audit Committee provide assistance to the Supervisory Board in supervising the financial report regime, in selecting an auditor, and in working with the auditor.

Risk and NPL Committee:	Remuneration Committee:	Nomination Committee:
Chairman: Kardos Imre	Chair person: dr. Gombai Gabriella	Chair person: Hornung Ágnes
Members: Benczédi Balázs Valkó Mihály	Members: Kardos Imre Benczédi Balázs	Members: dr. Ipacs László Feodor Rita

Risk and NPL Committee

As part of its ongoing monitoring of the Bank's risk-taking strategy and risk appetite, the Risk and NPL Committee reviews the risk strategy, remuneration policy and quarterly risk report in advance, approves the NPL Strategy and related implementation plan for the year, and monitors the high non-performing loan rate and the NPL Strategy.

Remuneration Committee

The Remuneration Committee is a consultative body that oversees the remuneration of directors and employees in risk management and internal lines of defence, and prepares remuneration decisions based on the long-term interests of shareholders, investors and other stakeholders in the company.

Nomination Committee

The Nomination Committee is responsible for nominating and recommending nominees to the Supervisory Board and the Board of Directors, with the exception of the members of the Supervisory Board representing the employees.

The Committees operate in accordance with the rules laid down in their rules of procedure. Bodies shall meet as often as necessary to carry out their functions and shall take their decisions in the form of a meeting or in writing and without a meeting. The work of the bodies is organized by the chairman of the body.

In accordance with the recruitment policy for the selection of members of the management bodies of MKB Bank Nyrt. and the Diversity Policy (Nomination Policy) applicable to the selection, members of the management boards of the members of the Bank Group, individuals with different professional skills, versatile regional and industry experience are elected into the managing bodies of the Bank Group and they also take advantage of these differences in their operations in the operation of those bodies, which the members of the Bank Group consider as a key consideration in determining the optimal composition of their bodies. Board appointments are based on the pool of expertise, experience, independence and knowledge represented by the candidates, taking into account what the body as a whole needs to function effectively. The members of the Bank Group pay particular attention to the representation of both genders in executive bodies which is why they strive to reach 15% female members in executive bodies. To this end, they commit themselves to favouring the member of the under-represented gender of the same management body among two candidates of the same capacity who are otherwise suitable, unless otherwise justified by professional judgment.

There is no agreement with an executive officer or an employee that provides for compensation in the event of a manager's resignation or termination by the employee or unlawful termination of the executive officer's or employee's relationship, or termination of the relationship due to a public takeover bid.

MAIN FEATURES OF THE INTERNAL CONTROL SYSTEM OF THE COMPANY

The provisions regarding the operation, management and functions of the internal control system of the Company are set out in the Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (hereinafter: Hpt.), the provisions of the Civil Code (Act V of 2013, hereinafter referred to as "the Civil Code") on business companies, Act CXX of 2001 on the Capital Markets; the applicable recommendations of the NBH (primarily Recommendation NBH 27/2018. (10 December) on the establishment and operation of internal lines of defence, the management and control functions of financial organisations), the Bank's Memorandum of Association and the Bank's effective rules of organisation and operation.

Section 154 (1) of the Hpt. requires banks to operate an internal control system. The elements of the internal control system include the management information system, in-process and management controls, and the independent internal audit organisation.

The *concept of a management information system* encompasses all computer-based or manual systems that transform data into useful information for decision-makers. Its main tasks are to produce ad hoc and regular reports and to support (in general) decision making.

In-process and management controls are forms of control directly or indirectly integrated into business processes. These controls are performed by persons who are functionally involved in the processes or by those responsible for the final outcome of the audited activities.

Independent internal audit is part of the internal control (monitoring) system independent of the process. Internal audits should be performed by persons who are not involved in the Bank's workflows and are therefore independent of the entities and workflows being audited. Accordingly, MKB Bank operates an independent organisational unit, the Executive Directorate for Internal Audit (hereinafter: BEI).

Also in view of the NBH recommendation 27/2018. (10 December) referred to above, the system of lines of defence is interpreted in the Bank's monitoring framework system. The above control mechanisms, which are also stressed in the Hpt as the elements of the Bank's internal monitoring system (distinguished from the external monitoring independent of the Bank (e.g. customers, NBH, other authorities) and the external monitoring system elements (e.g., auditor) related to the Bank) can be classified as follows:

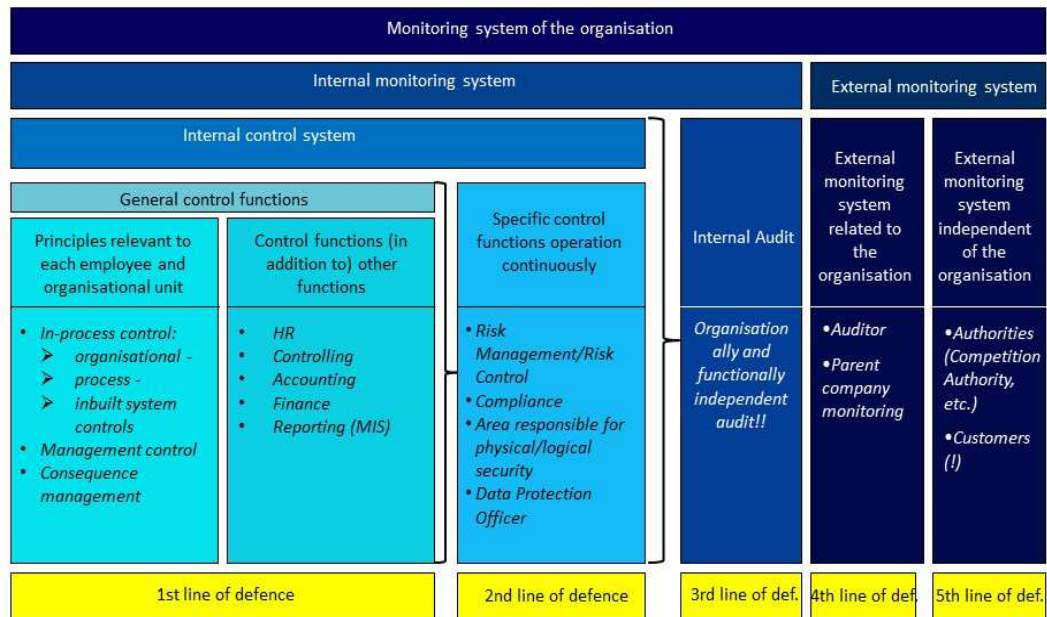
The Bank's internal monitoring system consists of an internal control system and independent internal audit.

Within the Bank's internal control system, we can distinguish between general principles (e.g. consistent responsibility management), practices (e.g. management control), organisational solutions (e.g. in-process controls), and areas with a control function (e.g. Controlling) and activities (e.g. management information system), which together form the first line of defence of the Bank's internal monitoring system. In fact, this line of defence includes all employees and managers who, through their prudent work, protect the Bank's interests and values.

Another element of the Bank's internal control system is all those organisations, activities and persons responsible for performing dedicated operational functions, activities and control functions (e.g., Risk Control, Compliance, Bank Security, Data Protection Officer), which together constitute the Bank's second line of defence. The function of the second line of defence can also be formulated by overseeing and supporting the activities of the first line of defence.

Independent internal audit, as another element of the internal monitoring system alongside the internal control system, is the Bank's third line of defence. Internal audit is an independent, objective assurance tool and consulting activity that adds value to the Bank's operations and improves its quality. It is responsible for examining the Bank's risk management, governance processes and the internal control system (or the Bank's first and second lines of defence) in a systematic and regulatory manner, evaluating and improving its operation, thereby contributing to the achievement of organisational goals.

The model of the Bank's monitoring system, including the place and role of independent internal audit, is illustrated in the figure below.



BRIEF DESCRIPTION OF THE COMPANY'S RISK MANAGEMENT SYSTEM AND PRINCIPLES APPLIED IN RISK MANAGEMENT

MKB Bank's Risk Control reviews the risk strategy of the MKB Group every year with the involvement of the relevant areas. In line with the current economic environment and in accordance with the Bank's and Magyar Bankholding Zrt.'s business strategy and capital plan, the Risk Strategy sets out the risk strategy principles and objectives of the Bank Group for each risk type and risk appetite. The approval of the risk strategy falls within the scope of competence of the Board of Directors.

In line with the basic regulatory requirements, a concept for the Group's comprehensive risk-taking processes has been developed and is constantly being fine-tuned.

The main elements of the concept are:

- Group-wide application of risk management principles;
- Applying the Unified Segmentation to the entire clientele of the group;
- A decision-making system that depends on customer quality and risk-taking;
- The use of Basel conform rating tools, in compliance with IRBF and analytical and behavioural scorecards, as well as a corresponding client rating regime, which adequately supports the decision-making activities of the bank management;
- Internal, group-level model validation methodology with annual frequency (rating and scoring tools, validation of related processes);
- Monitoring activities with IT support;
- Establishment of a comprehensive system of criteria that includes and takes into account relevant indicators enabling the detection of threatened loans in order to identify loans at risk as quickly as possible and, based on this, to determine the various types of customer/exposure management, the related tasks and order of procedure.
- IFRS 9 provisioning system;
- Pillar 1 and Pillar 2 capital accounting systems based on IFRS;
- Regular group level management reports, backtesting measurements (Risk Reports, Capital Management Reports, Rating Quality, Rating Monitoring Reports, etc.)
- Definition of a revised recovery plan and its evaluation on a monthly basis.

The key risk management principles include ultimate control at board level, independent control separate from risk areas, and appropriate measurement, diversification, monitoring and reporting of risks.

The effective risk management function of the Bank is ensured by the effective communication of risks and the willingness to assume risks within the organisation, continuous development for recognising, measuring, monitoring and managing risks, turning the key risk management processes and procedures up-to-date and user friendly and improving their efficiency, as well as employing adequately trained work force.

NON-FINANCIAL STATEMENT

STRATEGIC GOALS AND BRIEF DESCRIPTION OF THE BUSINESS MODEL

Founded in 1950, MKB Bank, is one of the oldest, dominant members of the Hungarian banking system. After the banking reform in 1987, the Bank continued to function as a universal commercial bank. Its main business activities include SME and large corporate as well as institutional banking services, international banking, retail and private banking, and money and capital market services. Through its financial group interests and strategic partners, the Bank offers its customers complex vehicle financing, asset leasing, fund management and advisory as well as pension fund, voluntary pension fund and health fund services.

MKB Bank provides its services through its nationwide branch network and modern, constantly evolving digital channels.

Core values of the MKB Bank: tradition, innovation, cooperation.

Respect for traditional banking values and a commitment to leading the way in innovative financial solutions and digitalisation are both present in the financial group.

The knowledge and expert base as well as the embedded system of relations built over seven decades of operation, made MKB Bank a major operator in the Hungarian corporate trade financing, cash and liquidity management and investment market.

MKB is a major and large corporate bank, with strong organisational knowledge in that segment. It puts a strong emphasis on supporting businesses with innovative solutions, professional expertise and development ideas, with financing support tailored to needs and opportunities. The Bank gradually builds strategic partnerships with the major actors of the Hungarian economy. MKB intends to make an active contribution to the achievement of the objectives of its retail and corporate customers with its financing and, indirectly, to also contribute to an increase in the performance of the Hungarian economy.

The MKB Group places special emphasis on the quality of customer relationships and professional customer service. The focus is on customer relations and experience, as well as value preservation and generation.

The fair banking values are extremely important in the daily operation and future image of the Bank, therefore it strives towards a sustainable business model and efficient and profitable operation with manageable risks.

On 15 December 2020, Magyar Bankholding Zrt. acquired a 97.19% majority stake in MKB through a capital increase implemented with in kind capital contribution. At the same time, Magyar Bankholding Zrt. also acquired a controlling interest in Budapest Bank Zrt. and MTB Magyar Takarékszövetkezeti Bank Zrt.

With this step, the second largest banking group in Hungary was established. The new banking group serves 1.9 million customers, operates almost half of the domestic branch network, more than 920 branches nationwide, and has a balance sheet total of nearly HUF 6,800 billion, a loan portfolio of HUF 3,600 billion and a deposit portfolio of HUF 4,300 billion. It serves 200,000 micro-enterprises, 30,000 small and medium-sized enterprises, 6,000 private banking partners and is a market leader in many areas.

According to the plans, Magyar Bankholding Zrt. will develop a detailed merger schedule and a detailed business strategy for the three banks during 2021, within which the bank holding intends to preserve and rely on the values and experience of the 70-year-old MKB Bank Nyrt. Accordingly, the member banks, including MKB, will retain their legal status for the time being and will operate as a separate entity and as a separate brand until the merger process takes place.

POLICIES RELATED TO SOCIAL ISSUES, EMPLOYMENT, RESPECT FOR HUMAN RIGHTS, THE ENVIRONMENT AND THE FIGHT AGAINST CORRUPTION AND THE RESULTS THEREOF, APPLIED DUE DILIGENCE PROCEDURES

Policies on social issues and their results, applied due diligence procedures

It is important for MKB Bank to use all its available economic power to contribute to the development of the community and it is also committed to building co-operation that encourages extensive community engagement.

The co-operation activities involve efforts to develop the financial culture, various educational programmes, targeted sponsoring and other support activities. All these activities are value-driven and have always been and will also be implemented in future to suit the local needs. The Bank does not carry out a risk assessment of its social and community engagement activities, but does so on the basis of its internal rules of procedure, which include relevant procedural rules.

Through its donation and sponsoring activities, MKB Group intends to offer true assistance in the support of programmes and matters serving the interests of the whole society, including financial culture and mindset development, value creation and preservation and the creation of opportunities, which are the most important aspects.

Social responsibility:

The corporate social responsibility programme of the MKB Bank is very diversified. As a responsible financial institution and a major actor in the domestic financial sector, it considers it important to contribute to community development and the well-being of those affected in the natural and social environment as much as possible depending on the available resources.

In the course of its social responsibility activities, the MKB Bank advocates for such important issues as the promotion of culture, sports, social awareness, knowledge development, health care and the help of children and their families in need.

As a socially responsible institution, the MKB Bank donated HUF 1 billion as part of its CSR activity to support the government's efforts against the pandemic.

As part of the MKB Donor Programme, the MKB Agricultural Partner Program donated 200 used but operable monitors and 121 used furniture in good condition to Szent István University to support its higher education courses. The MKB Agricultural Partner Program donated an additional 400 used but operable monitors to 8 vocational schools where agricultural training is pursued.

Health preservation activities:

MKB Bank launched its # 20minutes health programme with the slogan of “Health is the best investment” three years ago. This social responsibility programme is designed to raise awareness of the importance of physical and mental health in everyday life. During the pandemic period, this topic was particularly emphasized, as the crisis caused by the virus presented everyone with a challenge that could not be prepared for, during which the issues of mental resilience and physical recreation came to the fore. The programme therefore placed great emphasis on stress management, the pitfalls of home office arrangements, and the importance of family and self-time. At regular intervals, an expert gave lifestyle advice in the context of live lectures on social media and also helped answer any questions. In addition, “virtual community races” were organized in which participant could complete a pre-designated route, safely and individually.

Educational activities:

The MKB Bank has a variety of educational programmes. In 2020, the focus was on providing digital educational solutions. In addition to education, employees receive a number of digital, interactive, simulation materials that help them develop outside of education.

MKB also places great emphasis on the professional development of its employees. In addition to the statutory trainings, the Bank organises regular training. New banking products are also being introduced with a significant number of training hours. Thanks to the extensive in-house coaching community, professional training provides high level of banking knowledge.

The MKB Academy programme constitutes the framework of the Bank's training strategy. The system has 5 pillars. Besides the mandatory training (Mandatory Pillar), attention is also paid to the professional development of the colleagues, which is assisted with training courses dedicated to various topics (Professional Pillar). Skill development training activities are also available on a number of topics (Soft Skill Pillar). Employees can choose from numerous training courses to learn how to use the banking tools more effectively (System Pillar). Further extensive skill development training activities are also available as part of management training (Management Pillar). In 2020, the Academy expanded with a Care pillar, various mental health and well-being training courses and workshops held by psychologists.

MKB Bank is involved in various educational cooperation.

In co-operation with the National Association of Agricultural Equipment and Machine Distributors (MEGFOSZ), the Bank set an objective of promoting agricultural engineering, responding to changes in modern agricultural production.

The MKB Agro Partner programme, established in 2017 as part of the corporate business line of MKB Bank, supports the foundation and operation of agro businesses as a financial partner understanding agriculture.

Within the framework of the "Become an Agricultural Engineer!" programme, the "Become an Agricultural Engineer!" National Championship (LETIMOB) was also organised for secondary school students specialised in agricultural mechanics, machine technicians and machine repair in the 2019/2020 academic year. During the educational competition, the participants had to resolve online agricultural professional, financial issues and perform practical tasks. 29 teams from secondary schools of the country took part in the programme with nearly 150 students.

Financial culture and awareness developing activities:

The employees of MKB Bank took part voluntarily in the 'Money Week' events, founded by the Hungarian Banking Association and Financial Compass Foundation to increase the financial knowledge of primary and secondary school students.

Together with the Hungarian Interchurch Aid Organization, MKB has set itself the goal of creating a publication aimed at financial awareness, addressing specifically low-status families and children affected by the aid organization. The completed publication was distributed in 500 copies nationwide to children living in the temporary homes of the aid organization in the framework of MKB's Advent campaign.

Activities aimed at equal opportunities:

MKB Bank has had a relationship with the International Child Rescue Service (NGYSZ) which supports children facing difficulties in life. Owing to the 23 years of co-operation of the parties, in each academic year one hundred children and young people with outstanding

abilities yet in socially disadvantaged positions can benefit from the extraordinary opportunities provided under the MKB Scholarship Scheme. The Bank also offers discounted account management for young people with scholarships. MKB is also trying to follow young career starter professionals who were former scholarship holders: in 2009, the Graduate Students Club was established for the graduates with scholarships, which now has 29 members.

MKB Bank has been cooperating with the Hungarian Interchurch Aid Organization for many years. In 2020, the Bank supported the work of the Organization in several ways: with immediate financial assistance in connection with the pandemic, and by participating in monetary donations and running competitions to help the Hungarians in Beregszász. In addition, during the Advent period, the employees of MKB Group helped disadvantaged children with gifts hidden in Santa Claus packages with the help of the aid organisation.

In 2020, MKB Bank also supported the work of the Single Parents Club Foundation. From the donation, the Foundation supported the single parent disadvantaged families in the emergency caused by the pandemic with long-lasting food and disinfectants.

During the Advent period, the Bank provided support to the Foundation for the Foundations, and the organization provided gifts to increasingly disadvantaged children from the donated amount.

Within the scope of corporate social responsibility, state support is available through MKB Bank for disabled persons to be used for making their homes accessible.

As a traditional and major operator of the Hungarian financial sector, MKB Group is also committed to provide support and makes significant donations. The fundraising programme series called MKB Charity Program, launched in 2018, continued successfully in 2020. Through its fundraising campaigns, the Bank supported the work of the Age of Hope Foundation and the Interchurch Aid Organisation. In addition to fundraising, MKB continued its cooperation with the Hungarian Red Cross under the Voluntary Program in 2020, and announced blood donations among employees every two months. In the last nearly 20 years, blood donations have been organized at the Bank 76 times, during which 2,800 blood donors from the staff of the MKB Group have helped save the lives of 8,300 people.

MKB Group has developed its equal access strategy in line with the requirements of the legislation and the supervisory authority (MNB) with the objective of integrating the requirements of the strategy into the Bank's daily operation and making them an integrated part of the attitude of executive officers and all members of staff.

Employment policies and their results, applied due diligence processes

MKB Bank completed a risk assessment in employment and identified the risks relevant in terms of its operation which are also taken into account in its HR activities. Human resources actions focused on global trends, domestic and MKB specific (based on survey) areas, such as talent and career management, supportive environment, and workflows. The Bank is organising an Orientation Day for newly joined colleagues. The purpose of that day is to integrate the new colleagues and to deliver the basic training required for employment as well as present the global organisation to them.

The HR strategy concentrates on improving the employee experience by promoting flexible work, using the available digital devices and developing a co-operation-based corporate strategy.

Breakdown of the staff employed by MKB Bank by jobs (FTE):

MKB Bank / Area	Subordinate	Head of department	Director	Deputy CEO and executive director	Total
Deputy CEO for Legal, Governance and High priority Affairs	48	1	3	1	53
Deputy Chief Executive Officer for Risk	166	5	4	1	176
Deputy Chief Executive Officer for Finance and Operations	295	10	8	1	314
Chief Executive's Office	114	1	2	5	121
Deputy Chief Executive Officer for Business and General	843	17	84	4	948
Total	1 466	34	101	12	1 612

Breakdown of the staff employed by MKB Bank by average age, duration of service and area (years):

MKB Bank / Area	0-2 years	2-5 years	5-10 years	10 + years	Average
Deputy CEO for Legal, Governance and High priority Affairs	35	44	43	43	41
Deputy Chief Executive Officer for Risk	35	38	39	46	41
Deputy Chief Executive Officer for Finance and Operations	38	40	37	48	42
Chief Executive's Office	38	38	41	50	41
Deputy Chief Executive Officer for Business and General	37	40	39	46	41
Average	37	40	39	47	41

Breakdown of the staff employed by MKB Bank by duration of service and area (FTE):

MKB Bank / Area	0-2 years	2-5 years	5-10 years	10 + years	Average
Deputy CEO for Legal, Governance and High priority Affairs	16	13	9	16	53
Deputy Chief Executive Officer for Risk	27	36	39	75	176
Deputy Chief Executive Officer for Finance and Operations	90	69	30	126	314
Chief Executive's Office	47	36	12	26	121
Deputy Chief Executive Officer for Business and General	317	198	105	328	948
Total	496	351	194	571	1 612

Breakdown of the staff employed by MKB Bank by gender (number of employees):

MKB Bank / Area	Staff			Directors		Total
	Male	Female	Total	Male	Female	
Deputy CEO for Legal, Governance and High priority Affairs	21	32	53	2	2	4
Deputy Chief Executive Officer for Risk	61	115	176	4	1	5
Deputy Chief Executive Officer for Finance and Operations	86	228	314	7	2	9
Chief Executive's Office	70	51	121	4	3	7
Deputy Chief Executive Officer for Business and General	298	650	948	57	31	88
Total	536	1 076	1 612	75	39	113

MKB Bank offers an extra-wage benefit package to its employees, consisting of a number of components. An employee package is not just about cash benefits. It includes more elements aimed at improving the work environment, maintaining a healthy lifestyle, and strengthening motivated work and the sense of belonging to a team. These benefits provided by the Bank are described in detail in the Cafeteria Policy.

Talent management at MKB Bank:

A complex calibration process across the company and standard performance evaluation system were introduced for the first time in 2018. A talent management program, including subsidiaries, was also introduced and re-launched in December 2019. The programme participants were involved in the development of projects that impact the life of the entire organisation. The MKB Group places great emphasis on the training of employees and the care for talents, supporting the expansion of professional knowledge and the development of skills through extensive educational programmes.

Balance of work and private life at MKB Bank:

The flexible working hours at MKB Bank is one of the key elements of the HR strategy as it is an important component of improving the employee experience.

As part of the HR strategy, MKB Bank aims to increase the share of atypical employment. In addition, the Bank intends to make work from home as widely available to a wider range of employees and therefore the tools and devices are also developed constantly. Working from home reduces stress at work, improves the balance of work and private life and thus increases employee satisfaction, work morale, efficiency and loyalty. In 2020, home office work was implemented in 100% of jobs that do not require physical presence and flexible employment was widespread.

MKB Bank and health:

Health development and health preservation are important objectives for MKB Bank, as emphasised in various sports and health campaigns, such as the #20 Minutes Health programme. Sports opportunities are available for employees in many ways and a healthy lifestyle is promoted on several fronts. In 2020, due to the Pandemic, programmes supporting sports were also organized in an online form. Ensuring a healthy work environment for employees is a priority. In the spirit of the Year of Health programme series announced in 2018, we organized screenings for employees during 2020.

Employees benefit from preferential health insurance, which includes diagnostic services and extended consultation hours at the Bank's occupational physician on every day of the week.

Hobby and recreational facilities are also available at MKB Bank. The canteens of the Bank serve fitness food and other items, suitable for special nutrition, and restaurant services were made available with home delivery during the Pandemic.

MKB Bank and sports:

The MKB Bank provides a wide range of sports opportunities to its staff. The Váci utca headquarters and the Kassák Lajos utca office building have in total nearly 400 m² of fitness facilities. In 2020, online sports events and trainings became available so that the Bank can support the health of its employees in the home environment. The MKB Group also supports sports in other ways: the MKB Sports Association operates 23 sports departments.

Secure work environment:

In order to fulfil its legislative obligations, MKB Bank has prepared a risk assessment of the head office and other business sites of the Bank, including all branches. As it is an office work environment, there is only a low risk of accidents. Consequently, there are very few work accidents and their number is decreasing.

Employees are also required to attend occupational safety and fire training every year. A separate training material has been developed for the employees of the branch on how to respond if the branch is attacked. The personal, material and organisational conditions of safe work were defined in the Health and Safety Regulations of the Bank in compliance with the law.

A Health and Safety Representative also works at the Bank on behalf of the Works Council. The HS Representative is entitled to make sure that the requirements of healthy and safe work are fulfilled at the Bank.

Corporate governance:

MKB Bank, as a publicly traded company, whose shares are listed on the Budapest Stock Exchange, has prepared and published its Corporate Governance Report on the basis of the Corporate Governance Recommendations of the BSE.

MKB Group attaches great importance to the development and operation of a corporate governance system that complies with best market practice and ensures efficient and effective operation, and responsible corporate governance.

MKB Bank's governance structure takes into account regulatory, supervisory and stock exchange requirements as well as business specifics. MKB Bank intends to comply as much as possible with the Corporate Governance Recommendations of the BSE.

Regulations on the related policies, the applied due diligence and risk management procedures:

- Regulation on the Recruitment and Selection Process.
- Cafeteria Policy
- Incentive system
- Regulation on the Internal Training System of MKB Bank
- Regulation on Work at Home
- Employee recognition programme
- Regulation on Sponsorship and Management of Support Requests
- Health and Safety Regulation
- Regulation on the Procedural Rules of Promoting Equal Access at MKB Bank

Human rights policies and their results, applied due diligence processes

Relying on the standards also expressed in the Code of Conduct, the Bank takes into account the interests of its employees based on fair assessment, recognises their right to the integrity of their private life but, in exchange, the Bank expects its employees to responsibly protect their health.

It is especially important for the Bank to see that its employees can equally focus on their families and work as well as professional career. To support that, the Bank offers a healthy work environment without any discrimination. The Bank does not prepare a risk assessment of the enforcement of human rights but it operates in compliance with the equal access strategy and internal banking regulations that outline the procedural rules.

The equal access procedural rules of MKB Bank were developed on the basis of Section 283 of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises, the Decree of the Minister of National Economy 22/2016 (29 June) on the rules of equal opportunities for persons with disabilities in access to financial services provided by credit institutions and the MNB Recommendation 4/2017 (13 March) on the treatment of disabled customers. The

regulation contains the rules of implementation and details defined in MKB Bank's equal access strategy and constitute an inseparable part thereof.

The Bank's equal access was developed in the spirit of the Bank's social responsibility as the Bank pays special attention to the special needs of disabled customers and to special treatments promoting their equal access to services. The fundamental objective is to integrate the strategic requirements into the Bank's daily operation and to make them an integrated part of the attitude of executive officers and all other employees. The purpose of the regulation is to enable the disabled customers of the Bank to have access, whenever possible, to services of the same quality as those offered to ordinary customers but adapted to their special needs.

The Bank applies a fair treatment based on respect and esteem while keeping contact with its stakeholders. It rejects all forms of discrimination based on sex, age, ethnic origin, religious or political belief, belonging to any interest group, sexual orientation, different native languages and any other direct or indirect discrimination-based excluding conduct.

MKB Bank also operates a notification system (anonimbox@mkb.hu e-mail address), where anyone can report any violation of law, or internal regulation or other rule of conduct experienced by them, even anonymously.

A Works Council also operates at MKB Bank in compliance with the currently effective Labour Code. The Works Council is the main interest representation forum, representing the interests of the employees. The employees may be involved in the discussion of issues and taking decisions affecting them and can learn about any change therein through the Works Council. The Ethics and Conciliation Committee of the Works Council has the power to resolve conflicts between employees and conflicts between managers and employees.

MKB Bank does not employ children and is not engaged in forced labour either.

Data protection and data security:

Data protection represents the latest generation of human rights and MKB Bank also pays attention to that field accordingly. It has incorporated checkpoints in its business processes and IT development processes to ensure compliance with GDPR requirements.

In line with industry practice and MNB regulations, MKB Bank is constantly updating its security readiness, upgrading and replacing its IT security systems.

The Bank also prioritises the security of digital channels. We use regular external vulnerability tests and intrusion tests to make sure that the level of security is adequate.

In full compliance also with the MNB recommendations, MKB Bank informed its customers on what to do in relation to cyber fraud and data phishing and raised attention about the importance of prevention and alertness regularly on its own platforms as well as in various publications issued on a number of occasions during the year.

The members of staff of MKB Bank have a great deal of experience in how to prevent data phishing, or identify the actual cases as well as implement measures to mitigate losses. Potentially affected customers are contacted by the MKB Cyber Security Centre to make sure that the customer is aware of the transaction in question and has actually initiated it. MKB Bank also takes all security and legal measures required on such occasions in addition to informing its customers.

Environmental policy and its results, applied due diligence processes

Sustainability and climate strategy:

The MKB Financial Group is committed to being a key player in creating sustainable economic operation. As a Hungarian financial institution, it has a key role and responsibility in supporting and financing sustainable and climate-oriented investments. By reducing its ecological footprint and acting responsibly, the MKB Group also wants to set an example for market participants and partners, and feels obliged to protect the environment.

To translate the commitment into action, by appointing a responsible leader and setting up a climate task force, the MKB revised and renewed its Sustainability and Climate Strategy in December 2020, setting out its goals for a five-year strategic period.

The strategic goals set out a vision and actions due to MKB Group's role as a financial institution, as well as for the MKB Group as a group of companies.

- “MKB, partner in green finance”: as part of the strategy, the goal is to create an infrastructure, product and service range for retail and corporate customers that will help them achieve their own sustainability and climate goals. The MKB attaches great importance to investing in renewable energy and therefore supports the implementation of these projects. MKB is committed to ESG-based funding in its own operations and towards its customers. Part of the MKB's sustainability and climate strategy is the gradual revision of the risk framework and the incorporation of the ESG approach into the risk framework. On the one hand, this affects the full transposition of the requirements of the European Union, as well as the examination of the special elements that can be adjusted to the Hungarian market.
- *"MKB as a responsible group of companies"*: As a responsible group of companies, the MKB Group aims to fully comply with the goals of climate neutrality and sustainability, in particular the widest possible paperless and contactless operation in line with ESG principles. The group seeks to achieve these goals through its day-to-day operations, internal processes and the formation of its employee community.

Measures aimed at optimising energy consumption:

The majority of MKB Banks's energy consumption relates to the utility consumption of buildings and fuel consumption of its vehicle fleet. Energy consumption is constantly monitored and supervised in each building. The national centre of this network is at Kassák Lajos street office building.

The lighting system is gradually modernised in all MKB Bank buildings in order to reduce electricity consumption. Presence detectors were installed in the majority of public areas to prevent lamps being left switched on without a reason in certain premises. Natural sources of lighting are preferred in all office buildings and attempts are made not to use any artificial lighting in the rooms if there is sufficient sunlight during the day.

The energy consumption optimising measures also included the upgrade of the cooling of the head office and the replacement of the wet cooling towers of the liquid cooling equipment by pure air cooling-based appliances. Thus the efficiency of energy consumption almost trebled and the water and sewer consumption of the buildings has decreased significantly too.

In 2020, a solar system of 573 m² of solar panels with a maximum inverter power of 50 kVA was installed on the headquarters building and on the office building on Kassák Lajos Street.

The positive impact of the measure can also be observed in the annual energy consumption indicators of the buildings of MKB Group⁵.

Annual consumption	2018	2019	2020
Electricity (kWh)	13 443 085	11 739 135	11 084 110
Natural gas (gmm3)	989 021	933 664	932 862
Heat (MJ)	2 427 965	2 227 784	2 141 367
Water (m3)	27 486	25 808	24 340

In its environmental risk assessment the Bank took into account the annual energy consumption and annual carbon dioxide emission. The most recent complete energy efficiency audit for MKB Bank was carried out in 2019 by NKM Optimum Zrt. in full compliance with EU Directive 27/2012, Act LVII of 2015 and Government Decree 122/2015 (26 May). In addition, on the basis of the Decree of the Hungarian Energy and Public Utility Regulatory Authority (MEKH) 2/2017 (16 February), monthly energy desk officer report is also prepared with energy consumption analyses.

Selective waste collection and management:

MKB Bank focuses on sustainable development. One of its basic pillars is selective waste collection, which is promoted with bins provided on office corridors and kitchens for collecting PET bottles, batteries and caps as well as electronic waste (cartridges, toners, etc.). Following adequate treatment, the selectively collected waste may be recycled, thus reducing the impact on the environment.

MKB Bank takes all reasonable efforts to have green operation, in the context of which electric waste management is another key issue. The digitisation strategy has also a positive impact on MKB Bank's paper consumption.

Waste management is governed by a number of laws and regulations, and MKB Bank satisfies all legislative requirements. The Bank prepares waste management reports annually, containing the classification and quantities of waste generated and collected. In 2020, MKB Bank generated 49,445 kg paper and cardboard waste, and 12,865 kg scrapped electric and electronic waste.

Environmental measures relating to the vehicle fleet of MKB Bank:

MKB Bank has its own vehicle fleet and runs most of its cars on petrol and only fewer cars on diesel. From 2020, the Bank will not support the purchase of diesel vehicles. At the same time, an increasing proportion of electric/hybrid cars are appearing in new purchases.

As a result of the scheduled replacement of the fleet, the age of the vehicles is a maximum of 5 years. MKB Bank also uses taxi services for its employees. It was also a factor in the selection of the contracted service provider that it had the largest number of electric car fleet on the Budapest market. At the end of 2019, the Bank also signed a contract with MOL Limo, the aim of which is to replace petrol-powered taxi service in the future and to provide more

⁵ Remark: When the statement was prepared, the December 2020 energy consumption data were not yet fully available. Missing data were determined based on previous year's consumption.

environmentally friendly urban transport. At the end of 2020, the Bank revised the purchase limits for motor vehicles, significantly increasing the budget for hybrid / electric vehicles.

Anti-corruption and anti-bribery policy and its results, applied due diligence procedures

In compliance with its statutory obligations, MKB Bank laid down its anti-fraud and anti-corruption measures in various regulations.

Anti-money laundering and anti-terrorist financing measures:

MKB Bank developed its group anti-money laundering and anti-terrorist financing policy because it uses the available tools to actively participate in the prevention, combating and detection of money laundering, terrorist financing and economic crime both in Hungary and internationally. In order to effectively perform those tasks, the Bank applies the following main principles:

- The Bank Group consistently meets and complies with all relevant international and Hungarian embargo rules, requirements and regulations concerning the fight against money laundering and the relevant national and international legislation.
- The Bank Group does not and will not finance illegal arms transactions, drug trafficking, child labour, slave trade, prostitution or corruption.
- The Bank Group does not and will not finance persons or undertakings managed or controlled by persons qualifying as unreliable, having been sentenced for any related criminal act.
- Bank Group duly observes the FATF recommendations and pursues its activities in compliance with them.

The AML procedures apply to all employees of the Bank and fully comply with the FATF 40+9 recommendation, the Directive of the European Parliament and of the Commission 2015/849 and the Regulation of the European Council 2015/847. MKB Bank takes all reasonable efforts to prevent using the services offered by the Bank for money laundering or terrorist financing. MKB Bank has a Compliance organisation in which separate departments work on preventing money laundering and terrorist financing. The Bank fully co-operates with the official agencies in the identification of all suspicious cases, with special regard to potential money laundering and terrorist financing. The declarations required under the international regulations are available on the Bank's website.

In order to reduce the risk of money laundering and terrorist financing, the Bank must be aware of the activities of its customers, the nature of business relationships, business partners, financial habits, the Hungarian and business practice, the economic background of debits and credits in the account, the expected sales (amount, currency), hence it maintains a regular and active relationship with its customers. In accordance with the legal requirements, the Bank's staff perform the due diligence of customers. Natural persons and representatives of legal entities must also provide a declaration on the PEP status of the beneficial owner, which is then verified by the Bank's staff in public sources.

MKB Bank prepared its internal risk assessment in compliance with the provisions of Act LIII of 2017 on the prevention and combating of money laundering and terrorist financing, taking into account the Hungarian and international economic conditions and habits and the known risk factors. The Bank is also obliged to apply adequate risk classification on the basis of the nature and volume of the business relationship or a transaction order or the conditions related to the customer, product, service or the applied instrument.

MKB Bank identified its major risks in its risk assessment policy and reserves the right to refuse any customer relationship, transaction or transaction order if it is not in accordance with its risk appetite. The Bank monitors unusual activities and has identified cash transactions as a

high risk, in particular in the case of extremely large or highly intensive cash turnover, thus verifying it continuously controls such turnover.

MKB Bank does not maintain a business relationship with customers who carry reputational risks, only customers who use their products for legitimate purposes and whose identity can be determined and verified without any doubt. The Bank does not provide services to natural persons or legal entities who/which are subject to any sanction or are included in any restricted list, such as the restricted list of the United Nations Security Council (UN), the EU Consolidated Financial Sanctions list (EU), the Restricted List handled by the Foreign Assets Control Office (OFAC) of the United States, which also includes the Specially Designated Nationals and Blocked Persons (SDN). In addition, the Bank identified industries, products and countries that represent a high risk.

MKB Bank tries to prevent and detect fraud not only in its customer relations.

The MKB Group has detailed internal regulations covering insiders and potential insiders, which fully comply with the restrictions and prohibitions detailed in the Capital Market Act.

In the supply contracts partners must commit to compliance with the effective laws and regulations. The Bank's Compliance Unit also conducts due diligence on the partners before each new contract or a supply contract that has not been reviewed for a year. The Bank does not enter into any contract with a supplier who does not satisfy the minimum requirements stated by law.

The Bank also expresses the requirement of prudent operation in its Code of Conduct. Compliance with the effective law and the internal regulations of the Bank is a basic requirement for each employee of the Bank Group. Compliance with the Code of Conduct is required from all partners with a business or other contract with the MKB Group.

Rules on gifts:

In order to ensure transparent operation and prevent corruption, the Bank applies strict rules on conflict of interest and gifts to business partners. The Regulations on the Conflict of Interest of Employees and Gifts set out the rules of accepting and providing gifts for employees, the terms and conditions of holding executive officer positions, the restrictions on influential roles in the business organisation and on obtaining an influential share and majority influence as well as the rules of authorisation.

Regulations related to the respective policy and applied due diligence procedures:

- On the assessment of reliability of the employees of MKB Bank
- MKB Bank Group Policy on the Prevention of Money Laundering and Terrorist Financing
- On the conflict of interest of employees and on gifts
- MKB Bank group regulation on the prevention and combating of money laundering and terrorist financing and on the implementation of financial and asset restrictions ordered by the European Union and the UN Security Council.
- Regulation on the Fraud Reporting System of MKB Bank
- MKB Bank Anti-corruption Policy
- Policy on the Management of Inside Information, on the Prohibition of Insider Trading, Unlawful Disclosure of Inside Information and of Market Manipulation

SUMMARY OF MAIN RESULTS OF POLICIES PURSUED IN THE FIELDS OF SOCIAL AND EMPLOYMENT ISSUES, RESPECT FOR HUMAN RIGHTS, ENVIRONMENTAL PROTECTION AND THE FIGHT AGAINST CORRUPTION

Through its traditionally extensive community involvement, MKB Group continued to actively contribute to the promotion of various health, education, and equal opportunities programmes and activities in 2020.

In terms of employment it needs to be stressed that in 2020, home office work was implemented in 100% of jobs that do not require physical presence and flexible employment was widespread. It is favourable that the health preservation programmes launched three years ago continue to be popular. Due to the pandemic, in 2020, online sports events and trainings became available so that the Bank can support the health of its employees in the home environment. Implemented HR policies contribute to employee satisfaction.

By optimizing the energy consumption of office buildings, the Bank's energy consumption was significantly reduced and the employees' environmental awareness was further increased in 2020. By reducing its ecological footprint and acting responsibly, the MKB Group also wants to set an example for market participants and partners, for which the Bank revised and renewed its sustainability and climate strategy in December 2020.

In 2020, MKB Bank consistently and effectively applied its anti-corruption, anti-money laundering policies, and its dedicated Anti-Corruption Policy managed by Compliance.

SIGNIFICANT RISKS RELATING TO SOCIAL AND EMPLOYMENT ISSUES, RESPECT FOR HUMAN RIGHTS, ENVIRONMENTAL PROTECTION AND THE FIGHT AGAINST CORRUPTION CONCERNING BUSINESS RELATIONS, PRODUCTS AND SERVICES, AND THE MANAGEMENT THEREOF

MKB Bank identified its major risks in its risk assessment policy. Due to the nature of the Bank's operations, it is exposed to operational risk. Operational risk is the risk of loss due to human error, system failures, inappropriate or faulty internal processes, possible fraud or abuse of bank employees, customers or third parties, or external events, which includes legal risk, conduct risk, modelling risk, information and communication technology risk, and reputational risk. The Bank's key strategic objective is to minimize operational risks by applying risk-reducing controls in its core business processes.

The Bank also expresses the requirement of prudent operation in its Code of Conduct. Compliance with the effective law and the internal regulations of the Bank is a basic requirement for each employee and all partners with a business or other contract with the Bank are also expected to comply with the Code of Conduct. MKB Bank does not maintain a business relationship with customers who carry reputational risks, only customers who use their products for legitimate purposes. MKB Bank completed a risk assessment also in employment and identified the risks relevant in terms of its operation which are also taken into account in its HR activities.

KEY NON-FINANCIAL PERFORMANCE INDICATORS:

- Breakdown of employees by job, age and gender: (included in the chapter on Policies related to employment and the results thereof, applied due diligence procedures)

- Energy consumption: (included in the Environmental Policy and its results, applied due diligence processes chapter)

Budapest, 30 March 2021


dr Zsolt Barna
Chairman and Chief Executive Officer


János Nyemcsok
Deputy Chief Executive Officer

