

RISK MANAGEMENT AND CAPITAL ADEQUACY REPORT



PILLAR III 2021

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1. INTRODUCTION

Background of the Pillar III

The Bank prepared Risk Management and Capital Adequacy (Pillar III) report according to the Capital Requirements Directive IV (CRD IV) (European Parliament and Council Directive 2013/36/EU) and the Capital Requirements Regulation (CRR) (European Parliament and Council Regulation (EU) No 575/2013).

The Risk Management and Capital Adequacy (Pillar III) report complements the Set of Annual financial reports with additional information and is intended to be read in conjunction with the Set of Annual financial reports, which combined give a good and accurate description of the risk profile of the Bank. The report contains information on risk management, risk measurement and capital adequacy in accordance with the abovementioned requirements. The objective of Risk Management and Capital Adequacy report is to inform shareholders and other stakeholders of the Bank's risk management, including policies, methodologies, and practices.

Management Board's statement

The Management Board of the Bank confirms that the established internal control framework and the risk management systems are adequate given the credit institution's profile and strategy.

In the opinion of the Management Board, it is necessary to disclose once annually risk management and capital adequacy information according to the Capital Requirements Directives CRR/CRD IV.

The Bank framed risk profile in the risk appetite statement reflecting each material risk type:

- solvency risk;
- credit risk;
- liquidity risk;
- interest rate risk of banking book (IRRBB);
- operational risk;
- compliance on AML risk;
- reputational risk.

The Bank sees a need to enhance in a proportionate manner the incorporation of Environmental, Social and Governance (ESG) risks into Bank's business strategy, internal control system and risk management framework. The Bank will assess its business sensitivity to ESG risk and based on the results will incorporate ESG risk to its risk management system.

The Bank's business concept is critically dependent upon an efficient and well-functioning technological platform and related processes. This is a complex task driven by the Bank's need for efficient customer interaction and integration with third party solutions for financial services. The Bank therefore relies heavily on processes and systems delivered or hosted by third parties and on well-functioning integrations between the different systems and processes. Due to the Bank's reliance on digital solutions the Bank is exposed to risk of cyber-attacks. The protection of the Bank's customer and company data, and customers' trust in the Bank's ability to protect such information, is of key importance to the Bank.

The Management Board of the Bank is committed to address adequately all risks the bank face in its activities, take necessary measures to limit possible adverse effect which will lead to sustainable and profitable banks operations in the future.

Approved by the decision of the Management Board of AB Fjord Bank on March 16th, 2022.

/ digitally signed /
Veiko Kandla
Chairman of the Management Board
Board

/ digitally signed /
Danas Juzėnas
Member of the Management Board

/ digitally signed /
Mindaugas Varnas
Member of the Management
Board

2. SCOPE OF DISCLOSURE

The table below presents disclosed information in the Pillar III report in conjunction with the Set of Annual financial reports.

Table No 1. Disclosure requirements

Disclosure requirements with reference to the CRR Article	Disclosure in the Pillar III report	Disclosure in the Set of Annual financial reports
Article 435. Risk Management objectives and policies		p. 28
Article 436. Scope of application		p. 16
Article 437. Own Funds	p. 5-6	p. 33
Article 438. Capital requirements	p. 5-6	p. 33
Article 439. Exposure to counterparty credit risk	N/A	N/A
Article 440. Capital buffers	p. 5	
Article 441. Indicators of global systemic importance	N/A	N/A
Article 442. Credit risk adjustments	p. 8-10	p. 28-29, 36
Article 443. Unencumbered assets	p. 14	
Article 444. Use of ECAIs	N/A	N/A
Article 445. Exposures to market risk	p. 6	p. 31-32
Article 446. Operational risk	p. 11	p. 32
Article 447. Exposures in equities not included in the trading book	N/A	N/A
Article 448. Exposures to interest rate risk on positions not included in the trading book	p. 11	p. 32
Article 449. Exposures to securitization positions	N/A	N/A
Article 451. Leverage	p. 7-8	p. 33
Article 452. Use of IRB approach to the credit risk	N/A	N/A
Article 453. Use of credit risk mitigation techniques	N/A	N/A
Article 454. Use of the Advanced Measurement Approaches to operational risk	N/A	N/A
Article 455. Use of Internal Market Risk models	N/A	N/A

All Bank's exposures are limited to the residents of the Republic of Lithuania. Accordingly, an overview of the geographical distribution of the requirements such as credit exposures relevant for the calculation of the bank's countercyclical capital buffer or an additional disclosure related to the breakdown of exposures by geographical areas is not provided.

3. CAPITAL ADEQUACY

The Bank's objectives are to ensure the Bank's ability to comply with the capital adequacy requirements, the ability to maintain the optimal capital level for the loan portfolio growth and protect against possible risks.

During Year 2021 the Bank aimed to increase its sales volumes quarter by quarter, maintaining at the same time a good and controlled credit quality. The key drivers for the changes of financial assets and liabilities during the reporting period were such:

- The loan portfolio during the reporting period increased to 5.9m Eur from 54k Eur.
- The deposit portfolio during the reporting period increased to 4.7m Eur from 1m Eur.
- The Bank focused on strengthening its capital position and the 5m Eur equity issue was completed during the reporting period. The funds are intended to support the Bank's growth and profitability path.

The table below provides an overview of a Bank's prudential capital adequacy regulatory metrics.

Table No 2. (KM1) Prudential regulatory metrics

<i>in thousands of Eur</i>	Dec 2021	Sep 2021	Jun 2021	Mar 2021	Dec 2020
Available capital (amounts)					
Common Equity Tier 1 (CET1)	4 910	5 402	1 092	1 539	1 178
Tier 1	4 910	5 402	1 092	1 539	1 178
Total capital	4 910	5 402	1 092	1 539	1 178
Risk-weighted assets (amounts)					
Total risk-weighted assets (RWA)	5 291	3 455	2 033	1 114	878
Risk-based capital ratios as a percentage of RWA					
Common Equity Tier 1 ratio (%)	92,80%	156,35%	53,71%	138,15%	134,17%
Tier 1 ratio (%)	92,80%	156,35%	53,71%	138,15%	134,17%
Total capital ratio (%)	92,80%	156,35%	53,71%	138,15%	134,17%
Additional CET1 buffer requirements as a percentage of RWA					
Capital conservation buffer requirement (2.5%) (%)	2,50%	2,50%	2,50%	2,50%	2,50%
Countercyclical buffer requirement (%)	0,00%	0,00%	0,00%	0,00%	0,00%
Total of bank CET1 specific buffer requirements (%)	2,50%	2,50%	2,50%	2,50%	2,50%
CET1 available after meeting the bank's minimum capital requirements (%)	88,30%	151,85%	49,21%	133,65%	129,67%
Basel III leverage ratio					
Total Basel III leverage ratio exposure measure	10 080	9 850	3 835	3 189	3 344
Basel III leverage ratio (%) (row 2 / row 13)	48,71%	54,84%	28,47%	48,26%	35,23%
Liquidity Coverage Ratio					
Total high-quality liquid assets (HQLA)	2 008	4 963	1 170	1 513	1 834
Total net cash outflow	60	48	52	30	25
LCR (%)	3361%	10265%	2258%	4965%	7213%
Net Stable Funding Ratio					
Total available stable funding	9 584	9 296	3 469	2 736	2 153
Total required stable funding	4 894	3 084	1 671	456	54
NSFR (%)	196%	301%	208%	601%	3976%

The table below presents a reconciliation of Own Funds items and Capital adequacy ratios and buffers.

Table No 3. (CC1) Own Funds items and Capital adequacy ratios and buffers

<i>in thousands of Eur</i>	31.12.2021
Common Equity Tier 1 capital: instruments and reserves	
Directly issued qualifying common share (and equivalent for non-joint stock companies) capital plus related stock surplus	9 697
Retained earnings	(3 185)
Common Equity Tier 1 capital before regulatory adjustments	6 512
Common Equity Tier 1 capital: regulatory adjustments	
Other intangibles other than mortgage servicing rights (MSR) (net of related tax liability)	(918)
Deferred tax assets (DTA) that rely on future profitability, excluding those arising from temporary differences (net of related tax liability)	(684)
Total regulatory adjustments to Common Equity Tier 1 capital	(1 602)
Common Equity Tier 1 capital (CET1)	4 910
Additional Tier 1 capital (AT1)	-
Tier 1 capital (T1 = CET1 + AT1)	4 910
Tier 2 capital	-
Total regulatory capital (= Tier 1 + Tier2)	4 910
Total risk-weighted assets	5 291
Capital adequacy ratios and buffers	
Common Equity Tier 1 capital (as a percentage of risk-weighted assets)	92,80%
Tier 1 capital (as a percentage of risk-weighted assets)	92,80%
Total capital (as a percentage of risk-weighted assets)	92,80%
Institution-specific buffer requirement (capital conservation buffer plus countercyclical buffer requirements plus higher loss absorbency requirement, expressed as a percentage of risk-weighted assets)	2,50%
Of which: capital conservation buffer requirement	2,50%
Of which: bank-specific countercyclical buffer requirement	0,00%
Of which: higher loss absorbency requirement	-
Common Equity Tier 1 capital (as a percentage of risk-weighted assets) available after meeting the bank's minimum capital requirements	88,30%

The table below provides an overview of total risk-weighted assets (RWA) and the minimum capital requirements.

Table No 4. (COV1) RWA and the minimum capital requirements

<i>in thousands of Eur</i>	Dec 2021
Risk exposure amount	
Credit risk according to the standardized approach	5 037
Market risk according to the standardized approach	-
Operational risk according to basic indicator approach	254
Total risk exposure amount	5 291
Exposure amount for credit risk according to the standardized approach	
Central bank exposure	0
Institutional exposure	393
Retail loans (unsecured) exposure	4 392
Exposures in default	5
Other exposures	247
Total credit risk according to the standardized approach	5 037
Exposure amount for market risk according to the standardized approach	
Foreign exchange risk	0
Total market risk according to the standardized approach	0
Minimum capital requirement	
Credit risk according to the standardized approach	403
Market risk according to the standardized approach	0
Operational risk according to basic indicator approach	20
Total Minimum capital requirement	423

The carrying values reported in the financial statement and under the regulatory framework have no differences except the deductions from capital under the regulatory framework.

The table below presents a reconciliation of Regulatory capital to the Balance sheet items published in the Set of Annual financial reports, and the differences between accounting and regulatory frameworks with regulatory risk categories.

Table No 5. (CC2 and LI1) Reconciliation of Balance sheet items

<i>31/12/2021</i> <i>In thousands of euros</i>	Carrying values as reported in the financial statements	Deduction from capital under regulatory framework	Carrying values under regulatory framework	Carrying values under regulatory framework:			
				Subject to credit risk framework	Subject to counterparty credit risk framework	Subject to the security-sation framework	Subject to the market risk framework
Assets							
Cash balances at central banks	2 008		2 008	2 008			
Cash balances at commercial banks	1 964		1 964	1 964			
Loans and advances to customers	5 861		5 861	5 861			
Intangible assets	918	(918)	0				
Tangible assets	217		217	217			
Deferred tax assets	684	(684)	0				
Other assets	30		30	30			
Total assets	11 682	(1 602)	10 080	10 080	-	-	-
Liabilities							
Deposits from customers	4 758		4 758				
Other liabilities	412		412				
Total liabilities	5 170	-	5 170	-	-	-	-
Shareholders' equity							
Paid-in share capital	2 135		2 135				
Share premium	7 562		7 562				
Retained earnings	(3 185)		(3 185)				
Total shareholders' equity	6 512	-	6 512	-	-	-	-
Off-balance sheet items	-	-	-	-	-	-	-

4. LEVERAGE RATIO

The table below provides the reconciliation of the total assets in the published financial statements to the leverage ratio exposure measure.

Table No 6. (LR1) The leverage ratio exposures

<i>In thousands of Eur</i>	Dec 2021
Total consolidated assets as per published financial statements	11 682
Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	
Adjustment for fiduciary assets recognised on the balance sheet pursuant to the operative accounting framework but excluded from the leverage ratio exposure measure	
Adjustments for derivative financial instruments	
Adjustment for securities financing transactions (i.e. repos and similar secured lending)	
Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	
Other adjustments	(1 602)
Leverage ratio exposure measure	10 080

The table below provides the reconciliation of the total assets in the published financial statements to the leverage ratio exposure measure.

Table No 7. (LR2) The leverage ratio

<i>In thousands of Eur</i>	Dec 2021	Sep 2021
On-balance sheet exposures		
On-balance sheet exposures (excluding derivatives and securities financing transactions (SFTs), but including collateral)	11 682	11 348
(Asset amounts deducted in determining Basel III Tier 1 capital)	(1 602)	(1 498)
Total on-balance sheet exposures (excluding derivatives and SFTs)	10 080	9 850
Derivative exposures		
Total derivative exposures	-	-
Securities financing transaction exposures		
Total securities financing transaction exposures	-	-
Other off-balance sheet exposures		
Off-balance sheet items	-	-
Capital and total exposures		
Tier 1 capital	4 910	5 402
Total exposures	10 080	9 850
Leverage ratio		
Basel III leverage ratio	48,71%	54,84%

5. CREDIT RISK

The maximum risk is equal to the amount receivable less the recognized impairment loss as of the statement of the financial position date.

The table below presents the effect of CRM (credit risk mitigation) on Credit risk standardized approach capital requirements' calculations.

Table No 8. (CR4) The effect of CRM

<i>31/12/2021</i> <i>In thousands of Eur</i>	Exposures before CCF and CRM		Exposures post- CCF and CRM		RWA and RWA density	
Asset classes	On-balance sheet amount	Off- balance sheet amount	On-balance sheet amount	Off- balance sheet amount	RWA	RWA density
Sovereigns and their central banks	2 008		2 008		0	0%
Non-central government public sector entities						
Multilateral development banks						
Banks	1 964		1 964		393	8%
Securities firms						
Corporates						
Regulatory retail portfolios	5 842		5 842		4 392	87%
Equity						
Past-due loans ¹	19		19		5	0%
Higher-risk categories						
Other assets	247		247		247	5%
Total	10 080	-	10 080	-	5 037	100%

* Credit conversion factor (CCF)

¹ The past-due loans in the table above correspond to the unsecured portion of any loan past due for more than 90 days.

The table below presents the breakdown of credit risk exposures under the standardized approach by asset class and risk weight.

Table No 9. (CR5) The breakdown of credit risk exposures

Risk weight→	0%	10%	20%	35%	50%	75%	100%	150%	Others	Total
										credit exposures amount (post CCF and post-CRM) <i>31/12/2021</i> <i>In thousands of Eur</i>
Asset classes↓										
Sovereigns and their central banks	2 008									2 008
Non-central government public sector entities										-
Multilateral development banks										-
Banks			1 964							1 964
Securities firms										-
Corporates										-
Regulatory retail portfolios						5 842				5 842
Equity										-
Past-due loans							19			19
Higher-risk categories										-
Other assets							247			247
Total	2 008	-	1 964	-	-	5 842	266	-	-	10 080

* Credit conversion factor (CCF)

Allocation of the loan receivables from customers in areas by overdue days are presented in the following table.

Table No 10. The breakdown of overdue exposures

As of December 31, 2020 (in thousands of Eur):

Distribution of loans by overdue days	Gross loans	Expected credit losses (ECL)			Net loans	Impairment coverage, %
		Stage 1	Stage 2	Stage 3		
Not overdue	5 874 434	(71 625)	-	-	5 802 809	1.2%
0-30 days	44 176	(852)	-	-	43 324	1.9%
31-89 days	10 866	-	(894)	-	9 971	8.2%
90 days and more	18 883	-	-	(14 162)	4 721	75.0%
Total loans to customers	5 948 359	(72 477)	(894)	(14 162)	5 860 825	1.5%

The measurement of the provision for expected losses under the general model depends on whether the credit risk has increased significantly since initial recognition. The expected credit losses model has a three-stages based on changes in the credit risk. Upon initial recognition and when the credit risk has not increased significantly after initial recognition, a provision shall be made for 12-month expected losses, and the financial asset is recognized as Stage 1. Twelve-month expected losses are the losses expected to occur during the instrument's lifetime, but that can be linked to events occurring in the next 12 months. Stage 2 includes financial assets for which the credit risk has increased significantly since initial recognition, but there is no objective evidence of a loss. Stage 3 (in default) of the model includes assets for which the credit risk has increased significantly since initial recognition, and there has been objective evidence of a loss event on the balance sheet date.

The significant increase in the credit risk is assumed to occur 30 days past due from the initial recognition of the loan. The loan at default is considered when a loan is past due >90 days or it is unlikely that the borrower will meet its obligations, or there is evidence of other financial difficulties such as bankruptcy, decease, court proceeding, and other unlikely to pay criteria.

The table below presents the loan impairment changes between the stages that have been observed during the financial year.

Table No 11. Movement of loan allowances/impairment between stages

<i>In thousands of Eur</i>	Stage 1	Stage 2	Stage 3	Total
Amount as at 31.12.2020	(2)			(2)
From Stage 1 to Stage 2		(3)		(3)
From Stage 1 and Stage 2 to Stage 3			(15)	(15)
New originated	(81)			
Derecognised during the period	9	2	1	12
Changes due to update in the methodology for estimation	1			1
Amount as at 31.12.2021	(73)	(1)	(14)	(88)

The table below presents a picture of the credit quality of the Bank's assets.

Table No 12. (CR1) The credit quality of assets

<i>31/12/2021</i> <i>In thousands of Eur</i>	Gross carrying values of		Allowances/impairments	Of which ECL accounting provisions for credit losses on standardized approach exposures		Net values
	Defaulted exposures	Non-defaulted exposures		Allocated in regulatory category of Specific	Allocated in regulatory category of General	
Loans	19	5 930	88	88		5 861
Debt Securities						-
Off-balance sheet exposures						-
Total	19	5 930	88	88	-	5 861

The expected credit losses are adjusted by forecasted economic developments. For the macro environment outlook and forecasts, the Bank uses three scenarios with forward-looking information: baseline scenario (most probable and real), upside scenario, and downside scenario. As of the end of reporting period, the baseline scenario was estimated with a likelihood of 60%, downside scenario with a likelihood of 25%, and upside scenario with a likelihood of 15%. The expected credit loss model's necessary parameters as the probability of default, loss given default, and exposure at default for the calculation of allowances are based on the historical validated data from risk scoring service providers and the Bank's management's estimations. Loan provisioning is calculated on an individual level depending on the probability of default.

The table below presents the changes in stock of defaulted loans (no investments into debt securities).

Table No 13. (CR2) Changes in stock of defaulted loans

<i>In thousands of Eur</i>	
Defaulted loans at end of the previous reporting period	-
Loans that have defaulted since the reporting period	20
Returned to non-defaulted status	-
Amounts written off	-
Other changes	(1)
Defaulted loans at end of the reporting period	19

6. OPERATIONAL RISK

The Bank uses the base indicator method to calculate the minimum required capital need for operational risk. The calculation of the operational risk is part of the ICAAP-process as well. The risk appetite, risk tolerance, and early warning limit for operational risk are implemented accordingly.

There were no significant operational events in 2021 and no losses were incurred, and operational risk during 2021 has been in accordance with the risk appetite set by the Supervisory Board. Information security and IT operations are considered to be the most significant operational risk areas. The development and implementation of risk-mitigation measures in these areas have therefore had a particularly high priority.

7. INTEREST RATE RISK IN THE BANKING BOOK (IRRBB)

The Bank's interest rate risk is related to the interest rates on a banking book portfolio (IRRBB). The table below provides information on the Bank's changes in economic value of equity and net interest income under each of the prescribed interest rate shock scenarios.

Table No 14. (IRRBB1) The interest rate shocks

In thousands of Eur	ΔEVE	ΔEVE	ΔNII	ΔNII
Period	Dec 2021	Dec 2020	Dec 2021	Dec 2020
Parallel up	-180	42	67	57
Parallel down	203	-45	-67	-57
Steeper (shorts down, longs up)	-19	-12		
Flattener (shorts up, longs down)	-12	19		
Flattener (shorts up, longs unchanged)	-65	30		
Steeper (shorts down, longs unchanged)	27	-12		
Maximum	203	45	67	57
Period	84 months	60 months	12 months	12 months
Tier 1 capital	4910	1177	4910	1177

8. LIQUIDITY COVERAGE RATIO (LCR)

The table below presents the breakdown of a Bank's cash outflows and cash inflows, as well as its available high-quality liquid assets (HQLA), as measured and defined according to the LCR standard.

Table No 15. (LIQ1) LCR measurement

<i>In thousands of Eur</i>	Total unweighted value (average)	Total weighted value (average)
High-quality liquid assets		
Total HQLA		3 081
Cash outflows		
Retail deposits and deposits from small business customers, of which:	4 209	211
Stable deposits	4 198	210
Less stable deposits	11	1
Unsecured wholesale funding, of which:	-	-
Operational deposits (all counterparties) and deposits in networks of cooperative banks		
Non-operational deposits (all counterparties)		
Unsecured debt		
Secured wholesale funding		-
Additional requirements, of which:	-	-
Outflows related to derivative exposures and other collateral requirements		
Outflows related to loss of funding on debt products		
Credit and liquidity facilities		
Other contractual funding obligations	-	-
Other contingent funding obligations	-	-
TOTAL CASH OUTFLOWS		211
Cash inflows		
Secured lending (e.g. reverse repos)	-	-
Inflows from fully performing exposures	4 564	2 282
Other cash inflows	1 716	1 716
TOTAL CASH INFLOWS	6 280	3 998
		Total adjusted value
Total HQLA		3 081
Total net cash outflows		53
Liquidity Coverage Ratio (%)		5841%

9. NET STABLE FUNDING RATIO (NSFR)

The table below provides details of a Bank's NSFR and selected details of its NSFR components.

Table No 16. (LIQ2) NSFR measurement

In thousands of Eur	Unweighted value by residual maturity				Dec 2021	Unweighted value by residual maturity				Sep 2021
	No maturity	< 6 months	6 months to < 1 year	≥ 1 year	Weighted value	No maturity	< 6 months	6 months to < 1 year	≥ 1 year	Weighted value
Available stable funding (ASF) item										
Capital:										
Regulatory capital				4 910	4 910				5 403	5 403
Other capital instruments					-					
Retail deposits and deposits from small business customers:										
Stable deposits		4 736			4 499	3 849				3 730
Less stable deposits		22			20					
Wholesale funding:										
Operational deposits					-					
Other wholesale funding					-					
Liabilities with matching interdependent assets										
Other liabilities:										
NSFR derivative liabilities										
All other liabilities and equity not included in the above categories		233	49	130	155	419	33	147	163	163
Total ASF					9 584					9 296
Required stable funding (RSF) item										
Total NSFR high-quality liquid assets (HQLA)	2 008					4 963				
Deposits held at other financial institutions for operational purposes										
Performing loans and securities:										
Performing loans to financial institutions secured by Level 1 HQLA					-					
Performing loans to financial institutions secured by non-Level 1 HQLA and unsecured performing loans to financial institutions		1 963			197	997				100
Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, central banks and PSEs, of which:		692	658	4 505	4 504	439	418	2 755		2 770
With a risk weight of less than or equal to 35% under the Basel II standardised approach for credit risk		-	-	-	-					
Performing residential mortgages, of which:					-					
With a risk weight of less than or equal to 35% under the Basel II standardised approach for credit risk					-					
Securities that are not in default and do not qualify as HQLA, including exchange-traded equities					-					
Assets with matching interdependent liabilities										
Other assets:										
Physical traded commodities, including gold					-					
Assets posted as initial margin for derivative contracts and contributions to default funds of central counterparties					-					
NSFR derivative assets					-					
NSFR derivative liabilities before deduction of variation margin posted					-					
All other assets not included in the above categories		66	36	140	193	71	37	158		215
Off-balance sheet items										
Total RSF					4 894					3 084
Net Stable Funding Ratio (%)					195.8					301.4

10. UNENCUMBERED ASSETS

At the reporting date, all the Bank's assets are unencumbered and no collateral in respect of the assets was received. The table below provides details of a Bank's unencumbered assets.

Table No 17. Unencumbered assets.

<i>In thousands of Eur</i>	Carrying amount of encumbered assets	Fair value of encumbered assets	Carrying amount of unencumbered assets	Fair value of unencumbered assets
Assets of the reporting institution	-	-	11 682	-
Loans on demand			3 972	
Equity instruments			-	
Debt securities			-	
Loans and advances other than loans on demand			5 861	
Other assets			1 849	



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