KASPI.KZ JOINT STOCK COMPANY

Consolidated Financial Statements For the years ended 31 December 2018, 2017 and 2016

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Statement of Management's Responsibilities For the Preparation and Approval of the Consolidated Financial Statements For the Years Ended 31 December 2018, 2017 and 2016

Management is responsible for the preparation of the consolidated financial statements that present fairly the financial position of Kaspi.kz Joint Stock Company and its subsidiaries ("the Group") as at 31 December 2018, 2017 and 2016 and the results of its operations, cash flows and changes in equity for the years then ended, in compliance with International Financial Reporting Standards ("IFRS").

In preparing the consolidated financial statements, management is responsible for:

- properly selecting and applying accounting policies;
- presenting information, including accounting policies, in a manner that provides relevant, reliable, comparable and understandable information;
- providing additional disclosures when compliance with the specific requirements in IFRS are insufficient to enable users to understand the impact of particular transactions, other events and conditions on the Group's consolidated financial position and financial performance; and
- making an assessment of the Group's ability to continue as a going concern.

Management is also responsible for:

- designing, implementing and maintaining an effective and sound system of internal controls, throughout the Group;
- maintaining adequate accounting records that are sufficient to show and explain the Group
 's transactions and disclose with reasonable accuracy at any time the consolidated financial
 position of the Group, and which enable them to ensure that the consolidated financial
 statements of the Group comply with IFRS;
- maintaining accounting records in compliance with the Republic of Kazakhstan legislation;
- taking such steps as are reasonably available to them to safeguard the assets of the Group;
 and
- preventing and detecting fraud and other irregularities.

These consolidated financial statements were approved by the Chairman of the Management Board and the Chief Accountant on 20 February 2019 and will be provided to the shareholders for approval in accordance with the requirements of the legislation of the Republic of Kazakhstan.

On behalf of the Management:

Mikheil Lomtadze

Chairman of the Management BoardKasp

ksana Avdeyeva Chief Accountant

20 February 2019 Almaty, Kazakhstan



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INDEPENDENT AUDITORS' REPORT

To the Shareholders of Kaspi.kz Joint Stock Company

Opinion

We have audited the consolidated financial statements of Kaspi.kz Joint Stock Company and its subsidiaries ("the Group"), which comprise the consolidated statements of financial position as at 31 December 2018, 2017 and 2016 and the consolidated statements of profit or loss, consolidated statements of other comprehensive income, consolidated statements of changes in equity and consolidated statements of cash flows for the years then ended, and notes to the consolidated financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of the Group as at 31 December 2018, 2017 and 2016 and its consolidated financial performance and its consolidated cash flows for the each of the years then ended in accordance with International Financial Reporting Standards (IFRSs).

Basis for Opinion

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

Emphasis of Matter

We draw attention to Note 3 to the consolidated financial statements which describes the changes of presentation in respect of the comparative information presented in the statements of financial position as at 31 December 2017 and 2016 and consolidated statement of profit and loss for the years then ended. Our opinion is not modified in respect of this matter.

Key Audit Matters

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

Why the matter was determined to be a key audit matter

Impairment of loans to customers under IFRS 9 Financial instruments ("IFRS 9")

As described in Note 3 and Note 13 to the consolidated financial statements, the Group made a transition to IFRS 9 on 1 January 2018. The standard introduced expected credit losses model for impairment on financial instruments, including loans measured at amortised cost.

The loans to customers amounted to KZT 1,067,002 million, net of the related allowance for impairment losses of KZT 120,795 million as at 31 December 2018.

The assessment of the significant increase in credit risk and measurement of expected credit losses require considerable judgment in analyzing all reasonable and supportable information at the reporting date. Key areas of judgement included:

- The identification of loans with a significant increase in credit risk or credit impaired loans and allocation of loans to the appropriate stage of impairment;
- Measuring the amount of expected credit losses by assessing the probability of a loan falling into default and amount of recoveries expected from defaulted loans, including the valuation of collateral to determine the loss given default for individually assessed impaired loans.

Due to the significance of the loans' balances, magnitude of estimation uncertainties and the complexity of judgements applied by management in measuring expected credit losses, we identified impairment of loans as a key audit matter.

How the matter was addressed in the audit

We obtained an understanding of the loan loss provisioning process, particularly over the capture of loans in terms of the stage allocation, measurement and recognition of allowances for expected credit losses.

The audit procedures performed in this area, included:

- Assessment of the provisioning methodology developed for calculation of impairment losses in accordance with the requirements outlined in IFRS 9;
- Assessment of design and implementation of relevant controls over the expected credit loss model, including model governance and mathematical accuracy;
- Assessment of the reasonableness of management's assumptions and input data used in the model, including staging of loans, the probability of a loan falling into default and assessment of any recoveries expected from defaulted loans with the involvement of our internal specialists against requirements of the accounting standards;
- Independent assessment of collateral valuation used in calculation of impairment losses for individually assessed impaired loans by challenging assumptions around future cash flows and valuation of collateral held, agreeing key assumptions to supporting documents.
- Consideration of the adequacy and completeness of the Group's disclosures in respect of credit risk, structure and quality of loan portfolio and impairment allowance in accordance with IFRS 9.

We found no material exceptions in these tests.

Other Information - Annual Report

Management is responsible for the other information. The other information comprises the information included in the Annual Report, but does not include the consolidated financial statements and our auditors' report thereon. The Annual Report is expected to be made available to us after the date of this auditors' report.

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

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

When we read the Annual Report, if we conclude that there is a material misstatement therein, we are required to communicate the matter to those charged with governance.

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

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

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

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

Auditors' Responsibilities for the Audit of the Consolidated Financial Statements

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

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

- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.

- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtain sufficient appropriate audit evidence regarding the financial information of the
 entities or business activities within the Group to express an opinion on the
 consolidated financial statements. We are responsible for the direction, supervision
 and performance of the group audit. We remain solely responsible for our audit
 opinion.

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

We 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 consolidated financial statements of the current period and are therefore the key audit matters.

Nurlan Bekengy General Director

Deloitte, LLP

State license on auditing in the Republic of Kazakhstan

№ 0000015, type MFU-2, issued by the

Ministry of Finance of the

Republic of Kazakhstan dated

13 September 2006

Team teader

Qualified auditor

of the Republic of Kazakhstan

Qualification certificate

No.MF-0000116

dated 22 November 2012

20 February 2019 Almaty, Kazakhstan

Consolidated Statements of Profit or Loss For the Years Ended 31 December 2018, 2017 and 2016

(in millions of KZT, except for earnings per share which are in KZT)

	Notes	Year ended 31 December 2018	Year ended 31 December 2017*	Year ended 31 December 2016*
REVENUE	4,5,6	375,331	275,753	223,303
Interest Revenue		195,066	157,971	129,024
Fees & Commissions		140,259	106,841	89,528
Seller Fees		25,020	12,174	6,469
Transaction & Membership Revenue		19,255	5,748	2,769
Other gains/(losses)		(4,269)	(6,981)	(4,487)
COST OF REVENUE	7	(144,682)	(130,046)	(111,932)
Interest Expenses		(102,685)	(97,126)	(85,944)
Transaction Expenses		(6,709)	(3,288)	(2,259)
Operating Expenses		(35,288)	(29,632)	(23,729)
TOTAL NET REVENUE		230,649	145,707	111,371
TECHNOLOGY & PRODUCT DEVELOPMENT		(15,721)	(13,465)	(12,032)
SALES & MARKETING		(17,167)	(7,258)	(3,886)
GENERAL & ADMINISTRATIVE EXPENSES		(9,945)	(12,462)	(10,369)
PROVISION EXPENSE	8	(52,579)	(27,743)	(76,201)
OPERATING INCOME		135,237	84,779	8,883
INCOME TAX	9	(24,118)	(13,485)	(3,141)
NET INCOME		111,119	71,294	5,742
Attributable to:				
Shareholders of the Company		105,540	65,278	5,269
Non-controlling Interests		5,579	6,016	473
NET INCOME		111,119	71,294	5,742
Earnings per share				
Basic and diluted (KZT)	10	676	311	26

^{*}as reclassified, please see Note 3.

On behalf of the Management:

Mikher Chairman of the Management Board

lanagement Board

Consolidated Statements of Other Comprehensive Income For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

	Year ended 31 December 2018	Year ended 31 December 2017	Year ended 31 December 2016
NET INCOME	111,119	71,294	5,742
OTHER COMPREHENSIVE INCOME Items that will not be reclassified subsequently to profit or loss:			
Movement in Investment revaluation reserve for equity instruments at FVTOCI	(126)		
Items that may be reclassified subsequently to profit or loss			
Exchange differences on translation of foreign operations Difference between carrying amount and fair value of investments held-to-maturity at the reclassification date, net		-	(39)
of income tax KZT nil Movement in investment revaluation reserve for debt instruments at FVTOCI (2017, 2016: equity and debt instruments classified as investments available for sale):		•	(2,672)
Gains arising during the period, net of tax KZT nil Reclassification of (gains)/losses included in profit or loss , net	152	4,374	3,338
of tax KZT nil	8	(170)	(142)
Other comprehensive income for the year	34	4,204	485
TOTAL COMPREHENSIVE INCOME	111,153	75,498	6,227
Attributable to:			
Shareholders of the Company	105,572	69,240	5,710
Non-controlling Interests	5,581	6,258	517_
TOTAL COMPREHENSIVE INCOME	111,153	75,498	6,227

On behalf of the Management:

Chairman of the Management Board

Oksana Avdeyeva Chief Accountant

Consolidated Statements of Financial Position As at 31 December 2018, 2017 and 2016

(in millions of KZT)

	Notes	31 December 2018	31 December 2017*	31 December 2016*
ASSETS:	110100			2020
Cash and cash equivalents	11	168,471	304,839	157,389
Mandatory cash balances with National Bank of			-	•
the Republic of Kazakhstan		17,215	10,870	7,684
Due from banks	_	22,872	8,334	1,554
Investment securities and derivatives	12	366,631	212,535	291,940
Loans to customers	13	1,067,002	891,323	715,053
Property, equipment and intangible assets	14	36,688	32,175	33,389
Other assets	15	20,773	12,766	12,358
TOTAL ASSETS		1,699,652	1,472,842	1,219,367
LIABILITIES AND EQUITY				
LIABILITIES:				
Due to banks	16	49	63,200	40,272
Customer accounts	1.7	1,232,920	979,639	814,127
Debt securities issued	18	138,094	111,335	111,330
Insurance reserves		4,615	4,947	7,689
Other liabilities	19	20,453	29,290	14,829
Subordinated debt	20	89,603	93,579	93,905
TOTAL LIABILITIES		1,485,734	1,281,990	1,082,152
EQUITY:				
Share capital	21	54,857	130,144	130,144
Additional paid-in-capital		506	506	506
Revaluation reserve of financial assets		3,307	3,275	(687)
Other reserves		-	-	(48)
Retained earnings/(Accumulated deficit)		142,822	47,207	(2,863)
Total equity attributable to Shareholders of the				
Company		201,492	181,132	127,052
Non-controlling interests		12,426	9,720	10,163
TOTAL EQUITY		213,918	190,852	137,215
TOTAL LIABILITIES AND EQUITY		1,699,652	1,472,842	1,219,367

^{*}as reclassified, please see Note 3.

On belialf of the Management:

Chairman of the Management Board

Oksana Avdeyeva Chief Accountant

Consolidated Statements Of Changes in Equity
For the Years Ended 31 December 2018, 2017 and 2016

	Share capital	Additional paid-in capital	Revaluation reserve of financial assets	Property revaluation reserve	Cumulative translation reserve	Retained earnings/ (Accumulated deficit)	Total equity attributable to equity holders of the parent	Non- controlling interest	Total equity
Balance at 31 December 2015	130,144	386	(1,166)	(7)	6	(8,145)	121,218	13,445	134,663
Net Income Other comprehensive income/(loss)	*		479	-	(6)	5,269 (32)	5,269 441	473 44	5,742 485
Total comprehensive income/(loss)			479	-	(6)	5,237	5,710	517	6,227
Business acquisition under common control of Kaspi Magazin LLP Release of property revaluation reserve Decrease in non-controlling interest	-	120	-	- (41)	•	- 45	120	- (4)	120
due to buy-back by subsidiary Kaspi Bank JSC Balance at 31 December 2016	130,144	- -						(3,795)	(3,795)
	130,144	506	(687)	(48)	-	(2,863)	127,052	10,163	137,215
Net Income Other comprehensive income	-	•	3,962	<u>.</u>		65,278 -	65,278 3,962	6,016 242	71,294 4,204
Total comprehensive income		-	3,962	-	•	65,278	69,240	6,258	75,498
Release of property revaluation reserve Dividends declared Dividends declared by subsidiary	•	-	-	48	-	(46) (15,162)	2 (15,162)	(2)	(15,162)
Kaspi Bank JSC Decrease in non-controlling interest due to buy-back by subsidiary Kaspi Bank JSC	-	•	-	-	-	-		(2,021) (4,678)	(2,021)
Balance at 31 December 2017	130,144	506	3,275			47,207	181,132	9,720	(4,678)
					<u>_</u>	7/,20/	101,132	7,720	190,852

Consolidated Statements Of Changes in Equity For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

	Share capital	Additional paid-in capital	Revaluation reserve of financial assets	(Accumulated deficit)/ Retained earnings	Total equity attributable to equity holders of the parent	Non- controlling interest	Total eguity
1 January 2018 (as previously reported)	130,144	506	3,275	47,207	181,132	9,720	190,852
Effect of IFRS 9 adoption on 1 January 2018	-		-	(9,925)	(9,925)	(146)	(10,071)
Balance at 1 January 2018 (as restated)	130,144	506	3,275	37,282	171,207	9,574	180,781
Net Income Other comprehensive income	•	•	32	105,540	105,540 32	5,579 2	111,119 34
Total comprehensive income	_	*	32	105,540	105,572	5,581	111,153
Dividends declared by subsidiary Kaspi Bank JSC Purchase of treasury shares	(75,287)	•			(75,287)	(2,729)	(2,729) (75,287)
Balance at 31 December 2018	54,857	506	3,307	142,822	201,492	12,426	213,918

On behalf of the Management:

Mikhail Lambade Chairman of the Management Board

Oksana Avdeyeva Chief Accountant

Consolidated Statements of Cash Flows For the Years Ended 31 December 2018, 2017 and 2016

(in millions of KZT)

	Year ended 31 December 2018	Year ended 31 December 2017	Year ended 31 December 2016
CASH FLOWS FROM OPERATING ACTIVITIES:	2010	2027	2011
interest received	182,349	132,706	106,777
interest paid	(101,409)	(95,315)	(83,605)
Expenses paid on obligatory insurance of Individual deposits	(3,215)	(2,832)	(2,534
Fee & commission received	176,337	123,747	97,931
Fee & commission paid	(13,141)	(6,267)	(3,623)
Other Income received	3,414	2,119	3,429
Other expenses paid	(63,491)	<u>(53,241)</u>	(43,301
Cash flows from operating activities before changes in operating assets and liabilities	180,644	100,917	75,074
Changes in operating assets and flabilities (Increase)/decrease in operating assets:			
Mandatory cash balances with NBRK	(6,345)	(3,186)	744
Financial assets at fair value through profit or loss	(1,482)	60,812	7,532
Due from banks	(13,147)	(6,625)	(768)
oans to customers	(242,319)	(198,286)	(5,683)
Other assets	(2,425)	(4,058)	(2,079)
increase/(decrease) in operating liabilities:	• • •	* * *	• • •
Due to banks	(62,858)	23,02B	(6,495)
Customer accounts	211,058	165,012	4,739
Anandal (labilities at FVTPL	(1,312)	1,312	-
Other Habilities	(4,289)	11,033	3,401
Cash inflow from operating activities before income tax	57,725	149,959	76,445
ncome tax paid	(22,068)	(8,370)	(90)
Net cash inflow from operating activities ASH FLOWS FROM INVESTING ACTIVITIES:	35,657	141,589	76,355
Purchase of property, equipment and Intangible assets	(10.991)	(5.241)	(C DIE)
Proceeds on sale of property and equipment	436	(5,241) 681	(6,916) 311
roceeds on sale of financial assets at FVTOCI (2017, 2016: investments available-for-sale)			
urchase of financial assets at FVTOCI (2017, 2016: investments	149,691	185,077	23,969
available-for-sale)	(268,422)	(155,269)	(157,189)
Proceeds on maturity of investments held-to-maturity	(200, 122)	(133,203)	678
let cash (outflow)/inflow from investing activities	(129,286)	26,248	(139,147)
ASH FLOWS FROM FINANCING ACTIVITIES:			
lepayment of debt securities issued	(12,715)		(58,023)
ssue of debt securities issued	38,108		((,
Repayment of subordinated debt securities	(3,924)	(10)	(14)
ssue of subordinated bonds	, , , ,	()	2
Dividends paid		(15,156)	_
Dividends paid by subsidiary to non-controlling interest	(3,261)	(589)	
urchase of non-controlling interest by subsidiaries	(-)	(4,679)	(3,796)
Purchase of treasury shares	(75,287)	(1,07.5)	(0), 30,
Net cash outflow from financing activities	(57,079)	(20,434)	(61,831)
iffect of changes in foreign exchange rate on cash and cash equivalents	14,340	47	/2 2011
• • • • • • • • • • • • • • • • • • • •	T-L-T-C	7/	(2,381)
		4.45.455	(127.004)
IET (DECREASE)/INCREASE IN CASH AND CASH EQUIVALENTS	(136,368)	147,450	(127,004)
NET (DECREASE)/INCREASE IN CASH AND CASH EQUIVALENTS CASH AND CASH EQUIVALENTS, beginning of period	(136,368) 304,839	147,450 157,389	(127,004) 284,393

on behalf of the Management:

Hikheij Lomtadze Chalman of the Management Board

Oksana Avdeyeva Chief Accountant

Notes to Consolidated Financial Statements For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

1. Corporate information

General information

Description of Business

Kaspi.kz is guided by its mission "To Improve People's Lives" and thrives to transform, through innovation, the way our customers shop, pay and manage their personal finances. Kaspi.kz is built around four core platforms, which form its Ecosystem and includes Marketplace Platform, Payments Platform, e-Finance Platform and Consumer Financial Services Platform. Collectively, we refer to it as "our Ecosystem" or "Kaspi Ecosystem".

Kaspi.kz Ecosystem

We have developed an integrated consumer-focused Ecosystem of diversified products and services around our four core revenue-generating Platforms. Our Ecosystem includes customers, merchants, various service providers and strategic partners. Our Platforms enable the participants to interconnect and interact, thus, creating value for each participant by being a part of the Kaspi Ecosystem. Our Ecosystem has a powerful network effect, which means that the growth and development of one service is contributing to the growth and development of other services.

Kaspi.kz Strategy

We aim to expand Kaspi Ecosystem by developing seamless customer experiences and increasing our share of wallet through innovation and development of new services and categories, as well as by leveraging our big data capabilities and advanced technologies to better identify, analyse and serve the needs of our customers across our platforms.

We are investing into scale and design of our platforms to enable our customers, merchants, various service providers and strategic alliance partners to leverage our economies of scale and capital investment in technology, sales & marketing, mobile, customer acquisition and customer service.

Our Mobile App is at the centre of our strategy and serves as a single window into our entire Ecosystem integrating all our products and services into one convenient and readily available interface. It eliminates the conventional offline/online boundaries in shopping, payments and personal finances, allowing our customers to shop online and in-store, make and receive payments, manage all aspects of their personal finances, including their bank account and debit card, use location services and manage the bonus programme.

Kaspi.kz Segments

Our Ecosystem is built around four core Platforms, which are Marketplace, Payments, e-Finance and Consumer Financial Services.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Marketplace Platform

Our Marketplace Platform is positioned as the starting point and destination for customer shopping journeys via our Mobile App, website and in-store. Customers come to our Marketplace to buy a broad selection of products from various merchants. We have developed and continue developing mobile, online and QR technology for our customers. Our merchants in turn access a large number of our customers.

Payments Platform

The Payments Platform enables our customers to pay for regular household needs and for purchases, both online and in-store, as well as to make seamless online P2P money wire transfers both within and outside the Kaspi Ecosystem, inside Kazakhstan and globally.

e-Finance Platform

Through the e-Finance Platform, we enable our customers to access financing seamlessly online through our Mobile App and website, and to finance purchases on our Marketplace Platform or third-party merchant websites and mobile applications. The e-Finance Platform is also strategically built around the product selection, which means that customers are able to first select the goods they would like to buy, and then access available solutions to finance the purchase. Our infrastructure was built to make a credit decision in real time for our customers' online applications.

Consumer Financial Services Platform

The Consumer Financial Services Platform enables our customers to mainly access retail financial products through our network of Kaspi.kz outlets and point of sales, strategically located in the leading retail chains and shopping centers. This segment of the Kaspi Ecosystem mainly includes consumer finance and retail deposits. After an initial visit to our outlets, an increasing number of our customers continue managing their retail financial products through our Mobile App.

Information about the group of companies

Kaspi.kz Joint Stock Company was incorporated in the Republic of Kazakhstan on 16 October 2008 and registered as a Legal Company Asian Advisers Limited Liability Partnership. On 24 October 2012, the Group was re-registered due to a change in the composition of participants. On 15 October 2014, the Group changed its status from Limited Liability Partnership to Kaspi Joint Stock Company. By resolution of the board of the National Bank of the Republic of Kazakhstan ("NBRK") #166 dated 16 September 2015, Kaspi.kz Joint Stock Company was granted the status of a bank holding Group of Kaspi Bank Joint Stock Company. The registered address of the Group is 154A, Nauryzbai Batyr street, Almaty, 050013, the Republic of Kazakhstan.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Kaspi.kz Joint Stock Company is the parent Group of the following directly and indirectly held subsidiaries:

			Ownership as at	Ownership as at	Ownership as at
Subsidiary	Type of operation	Country of operation	31 December 2018	31 December : 2017	31 December 2016
Kaspi Group JSC	Holding Company	Kazakhstan	Directly (100%)	Directly (100%)	Directly (100%)
Kaspi Magazin LLP	E-commerce	Kazakhstan	Directly (100%)	Directly (100%)	Directly (100%)
Kaspi Bank JSC	Banking	Kazakhstan	Indirectly (94.40%)	Indirectly (94.07%)	Indirectly (91.17%)
Kaspi Insurance JSC	Insurance Distressed	Kazakhstan	Indirectly (94.40%)	Indirectly (94.07%)	Indirectly (91.17%)
ARK Balance LLP	asset management	Kazakhstan	Indirectly (94.40%)	Indirectly (94.07%)	Indirectly (91.17%)

In March 2016, the board of directors of the Group decided to voluntarily liquidate its dormant subsidiary Caspian Capital B.V., located and registered in the Netherlands. In July 2016, Caspian Capital B.V. was removed from the register of the Chamber of Commerce of Netherlands. Liquidation of that subsidiary had no material impact on the Group's consolidated financial statements.

In April 2016, the Group acquired Kaspi Magazin LLP for KZT 6 million. The acquisition of Kaspi Magazin LLP was accounted as business combination under common control and the difference between the net assets acquired (KZT 126 million) and consideration paid (KZT 6 million) was recognized as an additional paid-in capital in the amount of KZT 120 million.

As at 31 December 2018, 2017 and 2016, the shareholders' structure of shares was as follows:

	31 December 2018 %	31 December 2017 %	31 December 2016 %
Ultimate shareholders:			
Baring Vostok Funds	35.11	38.57	38.57
Kim Vyacheslav	33.27	21.45	21.45
Mikheil Lomtadze	31.62	9.98	9.98
Satybaldyuly Kairat	-	30.00	30.00
Total	100.00	100.00	100.00

These consolidated financial statements were approved by the Chairman of the Management Board and the Chief Accountant on 20 February 2019 and will be provided to the shareholders for approval in accordance with the requirements of the legislation of the Republic of Kazakhstan.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

2. Basis of presentation

Foreign currency translation

In preparing the financial statements of each individual entity, monetary assets and liabilities denominated in currencies other than the entity's functional currency (foreign currencies) are translated at the appropriate spot rates or exchange rates prevailing at the reporting date. Transactions in foreign currencies are initially recorded at their spot rates at the date of the transaction.

Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates at the dates of the initial transactions. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value is determined.

Rates of exchange

The exchange rates at the period-end used by the Group in the preparation of the consolidated financial information are as follows:

	31 December 2018	31 December 2017	31 December 2016
KZT/USD KZT/EUR	384.20 439.37	332.33	333.29
ICET/EUIX		398.23	352.42

Going concern

These consolidated financial statements have been prepared on the assumption that the Group is a going concern and will continue in operation for the foreseeable future.

3. Significant accounting policies

Basis of accounting

These consolidated financial statements have been prepared in accordance with International Financial Reporting Standards as issued by the International Accounting Standards Board (hereinafter "IFRS").

The Group and its subsidiaries maintain their accounting records in accordance with IFRS. The financial statements have been prepared on the historical cost basis, except for the revaluation of certain properties and financial instruments that are measured at revalued amounts or fair values at the end of each reporting period, as explained in the accounting policies below. The Group presents its statement of financial position in order of liquidity.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Offsetting

Financial assets and financial liabilities are offset and the net amount reported in the consolidated statement of financial position only when there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis, or to realise the assets and settle the liability simultaneously. Income and expense is not offset in the consolidated statement of profit and loss unless required or permitted by any accounting standard or interpretation, and as specifically disclosed in the accounting policies of the Group.

The principal accounting policies adopted are set out below.

Basis of consolidation

The consolidated financial statements incorporate the financial statements of the Kaspi.kz Joint Stock Company ("the Company") and entities controlled by the Company (its subsidiaries). Control is achieved when the Company has power over the investee; is exposed, or has rights, to variable returns from its involvement with the investee; and has the ability to use its power to affect its returns.

The Company reassesses whether or not it controls an investee if facts and circumstances indicate that there are changes to one or more of the three elements of control listed above.

When the Company has less than a majority of the voting rights of an investee, it has power over the investee when the voting rights are sufficient to give it the practical ability to direct the relevant activities of the investee unilaterally. The Company considers all relevant facts and circumstances in assessing whether or not the Company's voting rights in an investee are sufficient to give it power. Consolidation of a subsidiary begins when the Company obtains control over the subsidiary and ceases when the Company loses control of the subsidiary.

Non-controlling interests

Non-controlling interests represent the portion of profit or loss and net assets of subsidiaries not owned, directly or indirectly, by the Company Non-controlling interests are presented separately in the consolidated statement of profit or loss and within equity in the consolidated statement of financial position, separately from parent shareholders' equity.

Leases

Leases are classified as finance leases whenever the terms of the lease transfer substantially all the risks and rewards of ownership to the lessee. All other leases are classified as operating leases.

Operating lease payments are recognised as an expense on a straight-line basis over the lease term, except where another systematic basis is more representative of the time pattern in which economic benefits from the leased asset are consumed. Contingent rentals arising under operating leases are recognised as an expense in the period in which they are incurred.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

In the event that lease incentives are received to enter into operating leases, such incentives are recognised as a liability. The aggregate benefit of incentives is recognised as a reduction of rental expense on a straight-line basis, except where another systematic basis is more representative of the time pattern in which economic benefits from the leased asset are consumed.

Cash and cash equivalents

Cash and cash equivalents include cash on hand, cash balances with the NBRK, reverse repurchase agreements and unrestricted balances on correspondent accounts and deposits with other banks with original maturities within three months and are free from contractual encumbrances. Cash and cash equivalents are measured at amortised cost.

Mandatory cash balances with NBRK

Mandatory cash balances with NBRK represent funds in correspondent accounts with the NBRK and cash which are not available to finance the Group's day to day operations and, hence, are not considered as part of cash and cash equivalents for the purpose of the consolidated statement of cash flows.

Due from banks

In the normal course of business, the Group maintains advances and deposits for various periods of time with other banks. Due from banks initially are recognized at fair value. Due from banks are subsequently measured at amortized cost using the effective interest method, and are carried net of allowance for impairment losses.

Property, equipment and intangible assets

Property, equipment and intangible assets, except land and buildings, are carried at historical cost less accumulated depreciation and any recognised impairment loss, if any. Depreciation on assets under construction and those not placed in service commences from the date the assets are ready for their intended use.

Depreciation of property, equipment and amortization of intangible assets is charged on the carrying value of property, equipment and intangible assets and is designed to write off assets over their useful economic lives. Depreciation has been calculated on a straight-line basis at 2% per annum for buildings and construction and 10-33.3% for furniture and computers and intangible assets.

Leasehold improvements are amortized over the shorter of the life of the related leased asset or the lease term. Expenses related to repairs and renewals are charged when incurred and included in operating expenses in the consolidated statement of profit or loss, unless they qualify for capitalization.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Buildings and constructions held for use in the supply of services, or for administrative purposes, are stated in the consolidated statement of financial position at their revalued amounts, being the fair value at the date of revaluation defined on the basis of market data by qualified independent appraisers, less any subsequent accumulated depreciation and subsequent accumulated impairment losses. Revaluations are performed with sufficient regularity such that the carrying amounts do not differ materially from those that would be determined using fair values at the end of the reporting period.

Any revaluation increase arising on the revaluation of property is recognised and accumulated in equity, except to the extent that it reverses a revaluation decrease for the same asset previously recognised in profit or loss, in which case the increase is credited to the consolidated profit or loss to the extent of the decrease previously expensed. A decrease in the carrying amount arising on the revaluation of such land and buildings is recognised in the consolidated profit or loss to the extent that it exceeds the balance, if any, held in the property revaluation reserve relating to a previous revaluation of that asset.

Depreciation on revalued buildings is recognised in profit or loss. Depreciation of property revaluation reserve is transferred from property revaluation reserve to retained earnings on an annual basis. On the subsequent sale or retirement of a revalued property, the attributable revaluation surplus remaining in the property revaluation reserve is transferred directly to retained earnings.

An item of property, plant and equipment is derecognised upon disposal or when no future economic benefits are expected to arise from the continued use of the asset. The gain or loss arising on the disposal or retirement of an asset is determined as the difference between the sales proceeds and the carrying amount of the asset and is recognised in profit or loss.

Impairment of non-financial assets

At the end of each reporting period, the Group reviews the carrying amounts of its tangible and intangible assets to determine whether there is any indication that those assets have suffered an impairment loss. If any such indication exists, the recoverable amount of the asset is estimated in order to determine the extent of the impairment loss (if any). Where it is not possible to estimate the recoverable amount of an individual asset, the Group estimates the recoverable amount of the cash-generating unit to which the asset belongs. Where a reasonable and consistent basis of allocation can be identified, corporate assets are also allocated to individual cash-generating units, or otherwise they are allocated to the smallest group of cash-generating units for which a reasonable and consistent allocation basis can be identified.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Taxation

Income tax expense represents the sum of the tax currently payable and deferred tax.

Current tax

The tax currently payable is based on taxable profit for the year. Taxable profit differs from net profit as reported in the consolidated statement of profit or loss because it excludes items of income or expense that are taxable or deductible in other years and it further excludes items that are never taxable or deductible. The Group's liability for current tax is calculated using tax rates that have been enacted or substantively enacted by the end of the reporting period.

Deferred tax

Deferred tax is recognised on temporary differences between the carrying amounts of assets and liabilities in the consolidated statements of financial position and the corresponding tax bases used in the computation of taxable profit. Deferred tax liabilities are generally recognized for all taxable temporary differences and deferred tax assets are generally recognized for all deductible temporary differences to the extent that it is probable that taxable profits will be available against which those deductible temporary differences can be utilized. Such deferred tax assets and liabilities are not recognized if the temporary difference arises from the initial recognition of other assets and liabilities in a transaction that affects neither the taxable profit nor the accounting profit.

Deferred tax liabilities are recognized for taxable temporary differences associated with investments in subsidiaries, except where the Group is able to control the reversal of the temporary difference and it is probable that the temporary difference will not reverse in the foreseeable future. Deferred tax assets arising from deductible temporary differences associated with such investments and interests are only recognized to the extent that it is probable that there will be sufficient taxable profits against which to utilize the benefits of the temporary differences and they are expected to reverse in the foreseeable future.

The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset is realized, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period. The measurement of deferred tax liabilities and assets reflects the tax consequences that would follow from the manner in which the Group expects, at the end of the reporting period, to recover or settle the carrying amount of its assets and liabilities.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Deferred income tax assets and deferred income tax liabilities are offset and reported net on the consolidated statement of financial position if:

- The Group has a legally enforceable right to set off current income tax assets against current income tax liabilities; and
- Deferred income tax assets and the deferred income tax liabilities relate to income taxes levied by the same taxation authority on the same taxable entity.

Current and deferred tax are recognized in profit or loss, except when they relate to items that are recognized in other comprehensive income or directly in equity, in which case, the current and deferred tax are also recognized in other comprehensive income or directly in equity respectively.

The Group records a provision for uncertain tax positions if it is probable that the Group will have to make a payment to tax authorities upon their examination of a tax position. This provision is measured at the Group's best estimate of the amount expected to be paid. Provisions are reversed to income in provision for (recovery of) income taxes in the period in which management determines they are no longer required or as determined by statute.

Operating taxes

The Republic of Kazakhstan also has various other taxes, which are assessed on the Group's activities. These taxes are included as a component of operating expenses in the consolidated statement of profit or loss.

Provisions

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

The amount recognised as a provision is the best estimate of the consideration required to settle the present obligation at the end of the reporting period, taking into account the risks and uncertainties surrounding the obligation. When a provision is measured using the cash flows estimated to settle the present obligation, its carrying amount is the present value of those cash flows (where the effect of the time value of money is material).

When some or all of the economic benefits required to settle a provision are expected to be recovered from a third party, a receivable is recognised as an asset if it is virtually certain that reimbursement will be received and the amount of the receivable can be measured reliably. The expense relating to a provision is presented in the Consolidated Statement of Profit or Loss net of any reimbursement.

Contingencies

Contingent liabilities are not recognized in the consolidated statement of the financial position but are disclosed unless the possibility of any outflow in settlement is remote. A contingent asset is not recognized in the consolidated statement of financial position but disclosed when an inflow of economic benefits is probable.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Financial instruments

In the current year, the Group has applied IFRS 9 (as revised in July 2014) and the related consequential amendments to other IFRS that are effective for an annual period that begins on or after 1 January 2018. According to the transition provisions of IFRS 9, the Group elected not to restate comparatives. Differences arising from the adoption of IFRS 9 have been recognized directly in retained earnings as of 1 January 2018 and details of new IFRS 9 requirements are described in each relevant accounting policy.

The Group recognizes financial assets and liabilities on its consolidated statement of financial position when it becomes a party to the contractual obligation of the instrument. Regular way purchases and sales of financial assets and liabilities are recognised using settlement date accounting.

Financial assets and financial liabilities are initially measured at fair value. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities (other than financial assets and financial liabilities at fair value through profit or loss) are added to or deducted from the fair value of the financial assets or financial liabilities, as appropriate, on initial recognition. Transaction costs directly attributable to the acquisition of financial assets or financial liabilities at fair value through profit or loss are recognised immediately in profit or loss.

Financial assets

In 2017 and 2016, financial assets are classified into the following specified categories: financial assets 'at fair value through profit or loss' ("FVTPL"), 'held-to-maturity' investments ("HTM"), 'available-for-sale' ("AFS") financial assets and 'loans and receivables'. The classification depends on the nature and purpose of the financial assets and is determined at the time of initial recognition.

From 1 January 2018 due to the adoption of IFRS 9, all recognised financial assets that are within the scope of IFRS 9 are required to be measured subsequently at amortised cost or fair value on the basis of the entity's business model for managing the financial assets and the contractual cash flow characteristics of the financial assets.

Under IFRS 9, all debt financial assets that do not meet a "solely payment of principal and interest" (SPPI) criterion, are classified at initial recognition as fair value through profit or loss (FVTPL). Under this criterion, debt instruments that do not correspond to a "basic lending arrangement", are measured at FVTPL. For debt financial assets that meet the SPPI criterion, classification at initial recognition is determined based on the business model under which these instruments are managed:

- Financial assets, other than equity investments, that are managed on a "hold to collect" basis are measured at amortised cost;
- Financial assets, other than equity investments, that are managed on a "hold to collect and for sale" basis are measured at fair value through other comprehensive income (FVTOCI);
- Financial assets, including equity investments, that are managed on another basis, including trading financial assets, will be measured at FVTPL.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Equity financial assets are required to be classified at initial recognition as FVTPL unless an irrevocable designation is made to classify an instrument as FVTOCI. For equity investments classified as FVTOCI, all realised and unrealised gains and losses, except for dividend income, are recognised in other comprehensive income with no subsequent reclassification to profit and loss.

Financial assets, other than equity investments, that are measured subsequently at amortised cost or at FVTOCI are subject to impairment.

After initial measurement, amortised cost financial assets are measured using the effective interest rate method, less any impairment losses. The fair value of FVTPL and AFS/FVTOCI financial assets is determined under IFRS 13, Fair Value Measurement ("IFRS 13"). The fair value gains or losses for FVTPL are recognized in the statement of profit or loss and for AFS/FVTOCI are recognized in the other comprehensive income, until these instruments are disposed of. During 2016 and 2017, unrealized gains/losses on equity investments were reclassified to the statement of profit or loss upon a sale. This treatment ceased with the adoption of IFRS 9 as described above.

During 2016 and 2017, loans to customers, accounts receivable and other financial assets that have fixed or determinable payments that are not quoted in an active market (including balances with the NBRK, due from banks) are classified as 'loans and receivables'. Loans and receivables are measured at amortised cost using the effective interest method, less any impairment. Interest income is recognised by applying the effective interest rate. These instruments continue to be accounted for at amortized cost after the adoption of IFRS 9.

AFS equity investments that do not have a quoted market price in an active market and whose fair value cannot be reliably measured are measured at cost less any identified impairment losses at the end of each reporting period. These instruments are accounted for at fair value under IFRS 9. The Group has designated these investments as equity instruments at FVTOCI as the Group plans to hold them in the long term for strategic reasons.

The Group enters into a variety of derivative financial instruments to manage its exposure to interest rate and foreign exchange rate risk, including foreign exchange forward contracts, interest rate swaps and cross currency swaps. All derivative financial instruments are classified as held for trading and measured at fair value through profit or loss and not designated for hedge accounting.

Impairment of financial assets prior to 1 January 2018

Financial assets, other than those at FVTPL, are assessed for indicators of impairment at the end of each reporting period. During the years ended 31 December 2016 and 2017, financial assets are considered to be impaired when there is objective evidence that, as a result of one or more events that occurred after the initial recognition of the financial asset, the estimated future cash flows of the investment have been affected.

For listed and unlisted equity investments classified as AFS, a significant (more than 25%) or prolonged (more than two quarters) decline in the fair value of the security below its cost is considered to be objective evidence of impairment.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

In respect of AFS equity securities, impairment losses previously recognised in profit or loss are not reversed through profit or loss. Any increase in fair value subsequent to an impairment loss is recognised in other comprehensive income and accumulated under the heading of revaluation reserve of financial assets.

For all other financial assets, objective evidence of impairment could include:

- Significant financial difficulty of the issuer or counterparty; or
- Breach of contract, such as default or delinquency in interest or principal payments
- Default or delinquency in interest or principal payments; or
- It becoming probable that the borrower will enter bankruptcy or financial reorganisation or
- Disappearance of an active market for that financial asset because of financial difficulties.

For certain categories of financial asset, such as loans and receivables, assets that are assessed not to be impaired individually are, in addition, assessed for impairment on a collective basis. Objective evidence of impairment for a portfolio of loans and receivables could include the Group's past experience of collecting payments, an increase in the number of delayed payments in the portfolio, as well as observable changes in national or local economic conditions that correlate with default on receivables.

For financial assets carried at amortised cost, the amount of the impairment loss recognised is the difference between the asset's carrying amount and the present value of estimated future cash flows, discounted at the financial asset's effective interest rate.

For financial assets carried at cost, the amount of the impairment loss is measured as the difference between the asset's carrying amount and the present value of the estimated future cash flows discounted at the current market rate of return for a similar financial asset. Such impairment loss will not be reversed in subsequent periods.

The carrying amount of the financial asset is reduced by the impairment loss through the use of an allowance account. When the financial assets are considered uncollectible, they are written off against the allowance account.

For financial assets measured at amortized cost, if, in a subsequent period, the amount of the impairment loss decreases and the decrease can be related objectively to an event occurring after the impairment was recognised, the previously recognised impairment loss is reversed through profit or loss to the extent that the carrying amount of the investment at the date the impairment is reversed does not exceed what the amortized cost would have been had the impairment not been recognised.

If an AFS asset is impaired, a consolidated amount comprising the difference between its cost (net of any principal payment and amortization) and its current fair value, less any impairment loss previously recognised in the consolidated statements of profit or loss is transferred from equity to the consolidated statement of profit or loss.

In respect of AFS debt securities, impairment losses are subsequently reversed through profit or loss if an increase in the fair value of the investment can be objectively related to an event occurring after the recognition of the impairment loss.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Impairment of financial assets since 1 January 2018

Expected credit loss (ECL) measurement - definitions

ECL is a probability-weighted measurement of the present value of future cash shortfalls (i.e., the weighted average of credit losses, with the respective risks of default occurring in a given time period used as weights). An ECL measurement is unbiased and should be determined by evaluating a range of possible outcomes.

An ECL measurement is based on four components used by the Group:

- Exposure at Default (EAD) an estimate of exposure at a future default date, taking
 into account expected changes in exposure after the reporting date, including
 repayments of principal and interest, and expected drawdowns on committed facilities.
- Probability of Default (PD) an estimate of the likelihood of default to occur over a given time period.
- Loss Given Default (LGD) an estimate of a loss arising on default. It is based on the
 difference between contractual cash flows due and those that the lender would expect
 to receive, including from any collateral. It usually expressed as a percentage of EAD.
- Discount Rate a tool to discount an expected loss from the present value at the reporting date. The discount rate represents the effective interest rate (EIR) for the financial instrument or an approximation thereof.

Default and credit-impaired assets

The financial asset is considered to be in default, or credit impaired, when it meets one or more of the following criteria:

For individually significant loans (except interbank exposures):

- the borrower is more than 60 days past due on its contractual payments (regulatory definition of default for individually significant loans)
- significant deterioration of the borrower's operating results
- the bank has sold the borrower's debt with losses
- the loan had experienced a forced restructuring due to deterioration in the borrower's creditworthiness
- the misuse of borrowed funds
- the borrower is deceased (retail loans)
- the borrower is insolvent (bankruptcy) for corporate customers
- the borrower's debt was partially or fully written off due to a significant increase in credit risk

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

For homogeneous loans:

- the borrower is more than 90 days past due on its contractual payments
- the bank has sold the borrower's debt with losses
- the loan had experienced a forced restructuring due to a deterioration in borrower creditworthiness
- the borrower is deceased (retail loans)
- the borrower's debt was partially or fully written off due to a significant increase in credit risk

For other financial assets, debt securities and due from banks:

- the counterparty or issuer rated at C or less
- the counterparty or issuer is more than 30 days past due
- the counterparty or issuer has significant deterioration of operating results

Significant increase in credit risk (SICR)

The SICR assessment is performed on an individual basis and on a portfolio basis. SICR for individually significant loans is assessed on an individual basis by monitoring the triggers stated below. The criteria used to identify a SICR are monitored and reviewed periodically for appropriateness by the Group 's risk department.

The Group considers a financial instrument to have experienced a SICR when one or more of the following quantitative, qualitative or subsidiary criteria have been met:

For individually significant loans:

- Increase in lifetime probability of default over defined thresholds;
- The number of days past due is higher than 31 days but lower than 60
- The increase in credit risk, expressed in the relative threshold based on internal ratings is significant. SICR is determined based on the comparison date and credit risk rating as of the reporting date for each financial asset individually.

For homogeneous loans:

- increase in lifetime probability of default over defined thresholds;
- The number of days past due is more than 31 but less than 90
- External factors affect the solvency of individual groups of individuals (such as natural disasters, closure of the city-forming enterprise in the region, etc.)

For other financial assets, debt securities and due from banks:

- deterioration of the counterparty's or issuer's rating by 4 notch
- deterioration of the counterparty's or issuer's rating up to CCC+
- deterioration of operating results of the counterparty or issuer

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

ECL measurement - description of estimation techniques

General principle

For financial assets that are not purchased or originated credit impaired ("POCI") assets ECLs are generally measured based on the risk of default over one of two different time periods, depending on whether the borrower's credit risk has increased significantly in a three-stage model for ECL measurement:

Stage 1: a group of financial instruments for which no significant increase in the credit risk level has been recorded since initial recognition and provisions for this group are created as 12-month ECL, and interest income is calculated based on the gross book value.

Stage 2: a group of financial instruments for which a significant increase in the credit risk level has been recorded since the initial recognition and provisions for which equal ECL for the instrument's lifetime, and interest income is calculated based on the gross carrying amount of the financial asset.

Stage 3: a group of credit-impaired financial instruments, for which provisions equal the ECL amount for the instrument's lifetime, and interest income is accrued based on the carrying amount of the asset, net of the loss allowance.

ECL for POCI financial assets is always measured on a lifetime basis (Stage 3), and at the reporting date, the Group only recognizes the cumulative changes in lifetime expected credit losses since initial recognition.

The Group performs individual assessments for credit-impaired loans.

The Group performs assessments on a portfolio basis for retail loans and loans issued to small and medium entities ("SMEs"). This approach incorporates aggregating the portfolio into homogeneous segments based on borrower-specific information, such as delinquency, historical data on losses and forward-looking macroeconomic information.

Macroeconomic overlay and macroeconomic scenarios

The Group incorporates forward looking information in its impairment calculations via macroeconomic models, which leads to a direct adjustment of default probabilities. Since the Group cannot predict the future realisation of these macroeconomic parameters, it uses three scenarios - a base scenario, an optimistic scenario and a pessimistic scenario. The latter two scenarios are linked to a weight of 23%. The base scenario has an attached weight of 54% in the calculation. For each scenario a set of values for the relevant macroeconomic variables is used as an input for the macroeconomic model, which subsequently is applied to adjust the relevant input parameter.

The List of Macro-Economic Indicators

- Real GDP growth
- Unemployment

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

ECL measurement - description of estimation techniques

Principles of individual assessment - ECL assessments on an individual basis are done by weighting the estimates of credit losses for different possible outcomes against the probabilities of each outcome. The Group defines three possible outcomes for each loan.

Principles of portfolio assessments - to assess the staging of exposure and to measure a loss allowance on a collective basis, the Group combines its exposures into segments on the basis of shared credit risk characteristics, so that exposure to risk within a group are homogeneous.

Examples of shared characteristics include product type and the amount of debt.

Two types of PDs are used to calculate ECLs: 12- month and lifetime PD:

- 12-month PDs the estimated probability of a default occurring within the next 12 months (or over the remaining life of a financial instrument if less than 12 months). This parameter is used to calculate 12-month ECLs. An assessment of a 12-month PD is based on the latest available historical default data and adjusted for forward-looking information.
- Lifetime PDs the estimated probability of a default occurring over the remaining life
 of a financial instrument. This parameter is used to calculate lifetime ECLs. An
 assessment of a lifetime PD is based on the latest available historic default data and
 adjusted for forward looking information.

To calculate Lifetime PD, the Group uses different statistical approaches depending on the segment and product type, such as the extrapolation of 12-month PDs based on migration matrixes, developing lifetime PD curves based on the historical default data, hazard rate approach or other.

LGD represents the Group's expectation of the extent of loss on a defaulted exposure and assessed on a collective basis based on the latest available recovery statistics.

For loans secured by real estate, cash and liquid securities, the Group calculates LGD based on specific collateral characteristics, such as projected collateral values, historical sales discounts and other factors.

Modification of loans to customers

The Group modifies loans to customers in temporary financial difficulty in order to allow a borrower to recover solvency. Modification of loans is provided in the form of short-term revision of loan terms and may include the reduction of interest rate, reduction of monthly payment amount, extension of the loan term, or a combination of these measures that do not lead to derecognition of the financial asset. After the recovery period, ordinary contractual terms are to be applied. The recovery period is agreed in the modification terms, but in most cases is set for 6 months.

Modification of loan is provided only once and to the borrowers with overdue less than 90 days on a modification date, where sufficient grounds exist to support its recoverability.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

During the recovery period, such modified loans are classified to Stage 3, with corresponding increase in loss allowance. After the recovery period, such modified loans are allocated to the relevant impairment category, based on its days past due and impairment methodology.

Write off of loans to customers

Loans are written off against the allowance for impairment losses. Decision for the write off is taken by the Credit Committee and commonly at overdue more than one year. However write off of loans does not indicate that no other actions will be undertaken to collect the loans. Subsequent recoveries of amounts previously written off are reflected as an offset to the charge for impairment of financial assets in the consolidated statement of profit or loss in the period of recovery.

Derecognition of financial assets

The Group derecognizes a financial asset only when the contractual rights to the cash flows from the asset expire, or when it transfers the financial asset and substantially all the risks and rewards of ownership of the asset to another entity. If the Group neither transfers nor retains substantially all the risks and rewards of ownership and continues to control the transferred asset, the Group recognizes its retained interest in the asset and an associated liability for amounts it may have to pay. If the Group retains substantially all the risks and rewards of ownership of a transferred financial asset, the Group continues to recognize the financial asset and also recognize a collateralized borrowing for the proceeds received.

On derecognition of a financial asset in its entirety, the difference between the asset's carrying amount and the sum of the consideration received and the cumulative gain or loss that had been recognised in other comprehensive income and accumulated in equity is recognised in profit or loss.

On derecogntion of a financial asset other than in its entirety (e.g. when the Group retains an option to repurchase part of the transferred asset or retains a residual interest that does not result in the retention of substantially all the risks and rewards of ownership and the Group retains control), the Group allocates the previous carrying amount of the financial asset between the part it continues to recognize under continuing involvement, and the part it no longer recognizes on the basis of the relative fair values of those parts on the date of the transfer.

The difference between the carrying amount allocated to the part that is no longer recognised and the sum of the consideration received for the part no longer recognised and any cumulative gain or loss allocated to it that had been recognised in other comprehensive income is recognised in profit or loss. A cumulative gain or loss that had been recognised in other comprehensive income is allocated between the part that continues to be recognised and the part that is no longer recognised on the basis of the relative fair values of those parts.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Financial liabilities

Financial liabilities, such as due to banks, customer accounts, debt securities issued, subordinated debt and other financial liabilities are initially recognised at fair value. Subsequently amounts due are stated at amortized cost and any difference between carrying and redemption value is recognised in the consolidated statement of profit or loss over the period of the borrowings using the effective interest method as a component of interest expense.

Derecognition of financial liabilities

The Group derecognises financial liabilities when, and only when, the Group's obligations are discharged, cancelled, or expires. Where an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as a derecognition of the original liability and the recognition of a new liability, and the difference between the carrying amount of the financial liability derecognised and the consideration paid and payable is recognised in the consolidated statement of profit or loss.

Recognition of income and expense

Recognition of interest income and expense

Interest income from a financial asset is recognised when it is probable that the economic benefits will flow to the Group and the amount of income can be measured reliably. Interest income and expense are recognised on an accrual basis using the effective interest method. The effective interest method is a method of calculating the amortized cost of a financial asset or a financial liability (or group of financial assets or financial liabilities) and of allocating the interest income or interest expense over the relevant period. The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts (including all fees paid or received that form an integral part of the effective interest rate, transaction costs and other premiums or discounts) through the expected life of the financial instrument or, (where appropriate) a shorter period to the gross carrying amount.

Interest earned on assets at fair value is classified within interest income.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Revenue recognition prior to 1 January 2018

Fee &commission income and expense include fees other than those that are an integral part of effective interest rate. The fees included in this part of the Group's consolidated statement of profit or loss include among other things fees charged for servicing a loan. Fee & commission income and expenses with regards to services are accounted for as the services are received. These fees include seller fees, transaction and membership fees. Seller fees includes fees paid by merchants from shopping transaction originated during both online and in store shopping. The Group earns seller fees when transactions are completed on the Marketplace Platform and are generally determined as a percentage based on the value of merchandise and services being sold by merchants. The Group earns transaction and membership revenues when processing payments and engaging customers in Kaspi Ecosystem. This includes transaction fees paid by merchants when the Group enables various payment and purchase transactions. It also includes membership fees paid by customers and merchants for accessing various Kaspi Ecosystem services.

Revenue recognition since 1 January 2018

The Group recognized revenue from the following major sources:

Fees & commissions revenue mainly includes banking service fees and commissions. Banking service fees are recognized over a period in which the related service is provided, typically monthly, and include the following services of Kaspi Ecosystem, such as access to wide network of Kaspi ATMs with free cash withdrawals up to certain limits, 24-hour service line support, charge-free transfers between Kaspi clients' accounts and bill payments for services via kaspi.kz website and mobile application, SMS and mobile push notification services.

Seller fees includes fees paid by merchants from shopping transaction originated during both online and in store shopping. The Group earns seller fees when transactions are completed on the Marketplace Platform and are generally determined as a percentage based on the value of merchandise and services being sold by merchants. Seller fees are recognized when the services are rendered, which generally occurs upon delivery of the related products and services to the customer.

The Group earns transaction and membership revenues when processing payments/transactions and engaging customers in Kaspi Ecosystem. This includes transaction fees paid by merchants when the Group enables various payment and purchase transactions. Transaction fees charged to customers for processing services such as cash withdrawals over certain limits and P2P (pear to pear) money transfers to other banks' cards and wordlwide. Such fees are recognized when the associated service is satisfied, which normally occurs at the point in time the service is requested by client and provided by the Group.

Membership fee revenue is deferred and recognized over the terms of the applicable memberships, typically for one year, on a straight-line basis. Membership fees are paid on a monthly/quarterly basis or paid up front at the beginning of the applicable membership period by customers and merchants for accessing various Kaspi Ecosystem services. Generally, memberships are cancellable and non-refundable.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Share capital and share premium

Contributions to share capital are recognized at cost. Non-cash contributions are not included into the share capital until realized in cash.

Costs directly attributable to the issue of new shares, other than on a business combination, are deducted from equity net of any related income taxes.

Treasury shares repurchased from shareholders are recognized at cost of acquisition. When such repurchased treasury shares are further sold, any difference between their selling price and the cost of acquisition is charged to share capital (if positive) or to retained earnings (if negative). Where repurchased treasury shares are retired, the carrying value thereof is reduced by the amount paid by the Group at repurchase thereof, with the share capital respectively reduced by the par value of such retired shares restated, where applicable, for inflation, and the resulting difference is charged to retained earnings.

Dividends on ordinary shares are recognized in equity as a reduction in the period in which they are declared. Dividends that are declared after the reporting date are treated as a subsequent event under IAS 10 "Events after the Reporting Period" ("IAS 10") and disclosed accordingly.

Equity reserves

The reserves recorded in equity (other comprehensive income) on the Group's consolidated statement of financial position include:

- Revaluation reserve of financial assets, which comprises changes in fair value of financial assets at fair value through other comprehensive income investments (2017: investments available for sale) and allowance for impairment losses for debt instruments measured at fair value through other comprehensive income;
- Property revaluation reserve, which includes the amount of revaluation of property and construction.

Retirement and other benefit obligations

In accordance with the requirements of the Republic of Kazakhstan in which the Group operates, certain percentages of pension payments are withheld from total disbursements to staff to be transferred to pension funds, such that a portion of salary expense is withheld from the employee and instead paid to a pension fund on behalf of the employee. This expense is charged to the consolidated statement of profit or loss in the period in which the related salaries are earned. Upon retirement, all retirement benefit payments are made by the pension funds selected by employees. The Group does not have any pension arrangements separate from the pension system of the Republic of Kazakhstan. In addition, the Group has no post-retirement benefits or other significant compensated benefits requiring accrual.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Areas of significant management judgment and sources of estimation uncertainty

The preparation of the Group's consolidated financial statements requires management to make estimates, judgments and assumptions about the carrying amounts of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised if the revision affects only that period, or in the period of the revision and future periods if the revision affects both current and future periods.

Critical judgments in applying accounting policies

The critical judgments, apart from those involving estimations (see below), that the Group management has made in the process of applying the Group's accounting policies and that have the most significant effect on the amounts recognised in the consolidated financial statements. Significant judgments have been made in the business model assessment, significant increase in credit risk, models and assumptions used which are discussed in section Adoption of IFRS 9 Financial Instruments of Note 3 below.

Key sources of estimation uncertainty

The following are the key assumptions concerning the future, and other key sources of estimation uncertainty at the end of the reporting period, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year.

Significant increase of credit risk

As explained in note 2, ECL are measured as an allowance equal to 12-month ECL for stage 1 assets, or lifetime ECL assets for stage 2 or stage 3 assets. An asset moves to stage 2 when its credit risk has increased significantly since initial recognition. IFRS 9 does not define what constitutes a significant increase in credit risk. In assessing whether the credit risk of an asset has significantly increased the Group takes into account qualitative and quantitative reasonable and supportable forward looking information. Refer to note 26 for more details.

Incorporation of forward looking information

When measuring ECL the Group uses reasonable and supportable forward looking information, which is based on assumptions for the future movement of different economic drivers and how these drivers will affect each other. Refer to note 26 for more details, including analysis of the sensitivity of the reported ECL to changes in estimated forward looking information.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Models and assumptions used

The Group uses various models and assumptions in measuring fair value of financial assets as well as in estimating ECL. Judgement is applied in identifying the most appropriate model for each type of asset, as well as for determining the assumptions used in these models, including assumptions that relate to key drivers of credit risk. See note 26 for more details on ECL and note 24 for more details on fair value measurement.

Impairment of loans and receivables under IAS 39

The Group regularly reviews its loans and receivables to assess for impairment. The Group's loan impairment provisions are established to recognize incurred impairment losses in its portfolio of loans and receivables. The Group considers accounting estimates related to the allowance for impairment of loans and receivables a key source of estimation uncertainty because (a) they are highly susceptible to change from period to period as the assumptions about future default rates and valuation of potential losses relating to impaired loans and receivables are based on recent performance experience, and (b) any significant difference between the Group's estimated losses and actual losses would require the Group to record provisions which could have a material impact on its consolidated financial statements in future periods.

The Group uses management's judgment to estimate the amount of any impairment loss in cases where a borrower has financial difficulties (for individually significant loans) and there are few available sources of historical data relating to similar borrowers. Similarly, the Group estimates changes in future cash flows based on past performance, past customer behavior, observable data indicating an adverse change in the payment status of borrowers in a group, and national or local economic conditions that correlate with defaults on assets in the group. Management uses estimates based on historical loss experience for assets with credit risk characteristics and objective evidence of impairment similar to those in the group of loans and receivables. The Group uses management's judgment to adjust observable data for a group of loans or receivables to reflect current circumstances not reflected in historical data.

The allowances for impairment of financial assets in the consolidated financial statements have been determined on the basis of existing economic and political conditions. The Group is not in a position to predict what changes in conditions will take place in the Republic of Kazakhstan and what effect such changes might have on the adequacy of the allowances for impairment of financial assets in future periods.

Fair value measurement and valuation process

In estimating the fair value of a financial asset or a liability, the Group uses marketobservable data to the extent it is available. Where such Level 1 inputs are not available, the Group uses valuation models to determine the fair value of its financial instruments. Refer to note 24 for more details on fair value measurement.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

The Group considers that the accounting estimate related to valuation of financial instruments where quoted markets prices are not available is a key source of estimation uncertainty because: (i) it is highly susceptible to change from period to period because it requires management to make assumptions about interest rates, volatility, exchange rates, the credit rating of the counterparty, valuation adjustments and specific feature of the transactions and (ii) the impact that recognizing a change in the valuations would have on the assets reported on its consolidated statement of financial position as well as its profit or loss could be material.

Had the management used different assumptions regarding the interest rates, volatility, exchange rates, the credit rating of the counterparty and valuation adjustments, a larger or smaller change in the valuation of financial instruments where quoted market prices are not available, would have resulted that could have had a material impact on the Group's reported net income.

Change in presentation of consolidated statement of profit and loss

In 2018, Management made a decision to revise the presentation of certain line items on its consolidated statement of profit or loss to enhance its format and provide reliable and more relevant information. The historical comparative information has been revised to conform to the current presentation. This revised presentation does not have an effect on the Group's net income for comparative periods, nor does it have any impact on its consolidated statement of financial position, statement of other comprehensive income, statement of changes in equity or statements of cash flows. Consequently, the Group has introduced several items in the consolidated statement of profit and loss, which are discussed below.

Revenue includes interest revenue, fees, commission revenue, seller fees, transaction and membership revenue and other gains/(losses).

Cost of revenue includes interest expense, transaction expenses and operating expenses which are directly attributable for the Group's everyday operating activities. Operating expenses include costs incurred to operate retail network, 24-hour call support and communication with customers, product packaging, loan origination and risk assessment, customer deposit acquisition and other expenses, which can be attributed to the Group's operating activities related to the origination and delivery of the products and services.

Technology & product development expenses consist of staff and contractor costs that are incurred in connection with the research and development of new and existing products and services, development, design, data science and maintenance of our products and services, and infrastructure costs. Infrastructure costs include servers, networking equipment, data center and payment equipment related depreciation, rent, utilities, and other expenses necessary to support our technologies and platforms. Collectively, these costs reflect the investments we make in order to offer a wide variety of products and services to our customers within Kaspi Ecosystem.

Sales & marketing expenses consist primarily of online and offline advertising expenses, promotion expenses, staff costs and other expenses that are incurred directly to attract or retain consumers and merchants for Kaspi Ecosystem.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016

(in millions of KZT)

General & administrative expenses consist primarily of costs incurred to provide support to our business, including legal, human resources, finance, risk, compliance, executive, professional services fees, office facilities and other support functions.

The following tables show previous presentation of consolidated statements of profit or loss for the years ended 31 December 2017 and 2016:

	2017 year (as previously presented)	Adjustment		2017 year (restated)
Interest revenue	157,947	24	(A)	157,971
Interest expense	(98,219)	1,093	(B)	(97,126)
Net loss on financial assets and	• , ,	•	(-)	(3,7223)
liabilities at FVTPL	(14,586)	14,586	(C2)	-
Net gain on foreign exchange	* * *	,	(/	
operations	7,436	(7,436)	(C2)	
Fee & commission income	123,666	(123,666)		-
Fee & commission expense	(6,259)	6,259	(D1), (D2), (D3)	-
Net gain from derecognition of		ř		
investments available-for-sale	170	(170)	(C2)	-
Insurance premium, net of claims paid	(32)	32	(C1)	_
Other income	430	(430)		_
Operating expenses	(58,031)	58,031	(E1), (E2), (E3), (E4)	_
Fees & Commissions	-	106,841	(C1)	106,841
Other gains/(losses)	-	(6,981)		(6,981)
Seller Fees	-	12,174	(C3)	12,174
Transaction & Membership Revenue	-	5,748	(C4)	5,748
Transaction Expenses	-	(3,288)	(A), (D1)	(3,288)
Cost of revenue - Operating Expenses	-	(29,632)	(E1), (D2)	(29,632)
Technology & Product Development	-	(13,465)	(E2)	(13,465)
Sales & Marketing	-	(7,258)	(B), (E3), (D3)	(7,258)
General & Administrative expenses		(12,462)	(E4)	(12,462)

- (A) Represents reclassification from "Transaction Expenses" to "Interest revenue"
- (B) Represents reclassification of incentive fees related to Kaspi bonuses program from "Interest expense" to "Sales and marketing"
- (C1) Represents reclassification from "Fee & commission income" to "Fees & Commissions"
- (C1) Represents reclassification from "Insurance premium, net of claims paid" to "Fees & Commissions"
- (C1) Represents reclassification from "Other income" to "Fees & Commissions"
- (C2) Represents reclassification from "Net gain on derecognition of investments available-for-sale" to "Other gains/(losses)"
- (C2) Represents reclassification from "Net loss on financial assets and liabilities at fair value through profit or loss" to "Other gains/(losses)"
- (C2) Represents reclassification from "Net gain on foreign exchange operations" to "Other gains/(losses)"
- (C3) Represents reclassification from "Fee & commission income" to "Seller Fees"
- (C4) Represents reclassification from "Fee & commission income" to "Transaction & Membership Revenue"
- (D1) Represents reclassification from "Fee & commission expense" to "Transaction Expenses",
- (D2) Represents reclassification from "Fee & commission expense" to "Cost of Revenue Operating expenses"
- (D3) Represents reclassification from "Fee & commission expense" to "Sales & Marketing"
- (E1) Represents reclassification from "Operating expenses" to "Cost of revenue Operating expenses"
- (E2) Represents reclassification from "Operating expenses" to "Technology & Product Development"
- (E3) Represents reclassification from "Operating expenses" to "Sales & Marketing"
- (E4) Represents reclassification from "Operating expenses" to "General & Administrative expenses"

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016

(in millions of KZT)

	2016 year (as previously presented)	Adjustment		2016 year (restated)
Interest revenue	129,018	6	(A)	129,024
Interest expense Net loss on financial assets and liabilities at fair value through	(86,186)	242	(B)	(85,944)
profit or loss Net (loss)/gain on foreign exchange	(9,211)	9,211	(C2)	-
operations	4,582	(4,582)	• •	-
Fee & commission income	98,663	(98,663)	(C1), (C3), (C4)	-
Fee & commission expense	(3,653)	3,653	(D1), (D2), (D3)	-
Net gain from derecognition of investments available-for-sale Insurance premium, net of claims	141	(141)	(C2)	-
paid	(147)	147	(C1)	2
Other income	159	(159)		-
Operating expenses	(48,282)	48,282	(E1), (E2), (E3), (E4)	-
Fees & Commissions	-	89,528	(C1)	89,528
Other gains/(losses)	-	(4,487)	(C2)	(4,487)
Seller Fees		6,469	(C3)	6,469
Transaction & Membership Revenue	-	2,769	(C4)	2,769
Transaction Expenses	-	(2,259)	(A), (D1)	(2,259)
Operating Expenses	-	(23,729)	(E1), (D2)	(23,729)
Technology & Product Development	•	(12,032)	(E2)	(12,032)
Sales & Marketing	-	(3,886)	(B), (E3), (D3)	(3,886)
General & Administrative expenses		(10,369)	(E4)	(10,369)

- (A) Represents reclassification from "Transaction Expenses" to "Interest revenue"
- (B) Represents reclassification of incentive fees related to Kaspi bonuses program from "Interest expense" to "Sales and marketing"
- (C1) Represents reclassification from "Fee & commission income" to "Fees & Commissions"
- (C1) Represents reclassification from "Insurance premium, net of claims paid" to "Fees & Commissions"
- (C1) Represents reclassification from "Other income" to "Fees & Commissions"
- (C2) Represents reclassification from "Net gain on derecognition of investments available-for-sale" to "Other gains/(losses)"
- (C2) Represents reclassification from "Net loss on financial assets and liabilities at fair value through profit or loss" to "Other gains/(losses)"
- (C2) Represents reclassification from "Net gain on foreign exchange operations" to "Other gains/(losses)"
- (C3) Represents reclassification from "Fee & commission income" to "Seller Fees"
- (C4) Represents reclassification from "Fee & commission income" to "Transaction & Membership Revenue"
- (D1) Represents reclassification from "Fee & commission expense" to "Transaction Expenses",
- (D2) Represents reclassification from "Fee & commission expense" to "Cost of Revenue Operating expenses"
- (D3) Represents reclassification from "Fee & commission expense" to "Sales & Marketing"
- (E1) Represents reclassification from "Operating expenses" to "Cost of revenue Operating expenses"
- (E2) Represents reclassification from "Operating expenses" to "Technology & Product Development"
- (E3) Represents reclassification from "Operating expenses" to "Sales & Marketing"
- (E4) Represents reclassification from "Operating expenses" to "General & Administrative expenses"

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Change in presentation of consolidated statement of financial position

As a result of adoption of IFRS 9, Financial Instruments ("IFRS 9"), the management of the Group decided to change the presentation of certain line items in the consolidated statement of financial position, as provided below.

	31 December 2017 (as previously presented)	Adjustment	31 December 2017 (restated)
Financial assets at fair value through profit or loss	27	(27)	-
Investments available-for-sale	212,508	(212,508)	-
Investments securities and derivatives	-	212,535	212,535
	31 December 2016 (as previously presented)	Adjustment	31 December 2016 (restated)
Financial assets at fair value through profit or loss	75,426	(75,426)	-
Investments available-for-sale	216,514	(216,514)	-
Investments securities and derivatives	-	291,940	291,940

In addition, certain immaterial balances of current and deferred income tax assets and liabilities were reclassified to 'Other assets' or 'Other liabilities' line items in the consolidated statement of financial position as at 31 December 2017 and 2016, respectively.

Application of new and revised International Financial Reporting Standards (IFRSs)

In the current year, the following accounting standards have been adopted and have affected the amounts reported in these consolidated financial statements:

Adoption of IFRS 9 Financial instruments

In the current year, the Group has applied IFRS 9 (as revised in July 2014) and the related consequential amendments to other IFRS that are effective for an annual period that begins on or after 1 January 2018. According to the transition provisions of IFRS 9, the Group elected not to restate comparatives. Differences arising from the adoption of IFRS 9 have been recognized directly in retained earnings as of 1 January 2018 and details of new IFRS 9 requirements are described in the relevant accounting policies above.

The table below represents the impact of adopting IFRS 9 standard on the allowances for impairment and reconciliation of the aggregated amount of opening balances of the estimated amounts of allowances for impairment for financial assets, accrued in accordance with the IAS 39, and loss allowances for loan commitments and financial guarantee contracts in accordance with IAS 37 Provisions, Contingent Liabilities and Contingent Assets with the expected credit losses in accordance with IFRS 9.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016

(in millions of KZT)

	IAS 39 as at 31 December 2017	Remeasu- rement	IFRS 9 as at 1 January 2018
Allowance for impairment losses			
Cash and cash equivalents	-	15	15
Due from banks	-	3	3
Loans to customers	90,148	12,366	102,514
Financial assets at fair value through other	,	,	102,01
comprehensive income (2017: investments available			
for sale)	65	144	209
Other financial assets	1,741		1,741
Commitments and contingencies	-,	17	17

A reconciliation between the carrying amounts under IAS 39 to the balances reported under IFRS 9 as of 1 January 2018 is, as follows:

	Classification category in accordance with IAS 39	category in	Carrying amount in accordance with IAS 39 as at 31 December 2017	Remeasu- rement	Carrying amount in accordance with IFRS 9 as at 1 January 2018
Cash and cash equivalents Mandatory cash balances with National Bank of	Loans and receivables	Amortized cost	304,839	(15)	304,824
the Republic of Kazakhstan	Loans and receivables Loans and	Amortized cost	10,870		10,870
Due from banks	receivables Loans and	Amortized cost	8,334	(3)	8,331
Loans to customers Financial assets at fair value through	receivables Financial assets at fair value through	Amortized cost Financial assets at fair value through	891,323	(12,366)	878,957
profit or loss Financial assets at fair value through other comprehensive	profit or loss	profit or loss Fair value through other comprehensive	27	•	27
income Other financial	Available for sale Loans and	income	212,508	(144)	212,364
assets Other financial liabilities	receivables	Amortized cost	8,784	(17)	8,784 17
Tax impact related to adoption of IFRS 9			-	2,474	1/
Total impact on equity of IFRS 9 adoption at					
1 January 2018				(10,071)	

There were no changes to the measurement basis of other financial liabilities categories.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Adoption of IFRS 15 Revenue from Contracts with Customers

In the current year, the Group has applied IFRS 15 Revenue from Contracts with Customers ("IFRS 15") which establishes a single comprehensive model for entities to use in accounting for revenue arising from contracts with customers. IFRS 15 supersedes the current revenue recognition guidance including IAS 18, Revenue ("IAS 18"), IAS 11, Construction Contracts ("IAS 11") and the related interpretations when it becomes effective.

The core principle of IFRS 15 is that an entity should recognise revenue to depict the transfer of promised goods or services to customers in an amount that reflects the consideration to which the entity expects to be entitled in exchange for those goods or services.

Under IFRS 15, an entity recognises revenue when or as a performance obligation is satisfied, i.e. when 'control' of the goods or services underlying the particular performance obligation is transferred to the customer.

The Group adopted IFRS 15 using the modified retrospective method, with the effect of initial application recognised on 1 January 2018 and without restatement of the comparative periods. Apart from providing more extensive disclosures for the Group's revenue transactions, the application of IFRS 15 has not had a significant impact on the financial position and/or financial performance of the Group. The Group's accounting policies for its revenue streams are disclosed in detail in note 2.

New and revised IFRSs in issue but not yet effective

At the date of authorisation of these financial statements, the Group has not applied the following new and revised IFRS Standards that have been issued but are not yet effective:

IFRS 16 Leases

In January 2016, the IASB issued IFRS 16 "Leases" ("IFRS 16"), effective from 1 January 2019, which will replace IAS 17 "Leases" ("IAS 17"). The new standard introduces a comprehensive model for the identification of lease arrangements and accounting treatments for both lessors and lessees. IFRS 16 results in lessees accounting for most leases within the scope of the standard in a manner similar to the way in which finance leases are currently accounted under IAS 17. Lessees will recognize a right-of-use asset and a corresponding financial liability on the balance sheet. The asset will be amortised over the length of the lease, and the financial liability measured at amortised cost. In contrast to lessee accounting, IFRS 16 substantially carries forward the lessor accounting requirements in IAS 17. The date of initial application of IFRS 16 for the Group will be 1 January 2019.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

On initial application of IFRS 16, for all leases (except as noted below), the Group will:

- Recognise right-of-use assets and lease liabilities in the consolidated statement of financial position, initially measured at the present value of the future lease payments;
- Recognise depreciation of right-of-use assets and interest on lease liabilities in the consolidated statement of profit or loss;
- c) Separate the total amount of cash paid into a principal portion (presented within financing activities) and interest (presented within operating activities) in the consolidated cash flow statement.

Under IFRS 16, right-of-use assets will be tested for impairment in accordance with IAS 36 Impairment of Assets. This will replace the previous requirement to recognise a provision for onerous lease contracts.

For short-term leases (lease term of 12 months or less) and leases of low-value assets (such as personal computers and office furniture), the Group will opt to recognise a lease expense on a straight-line basis as permitted by IFRS 16.

The management of the Group is currently assessing a potential impact of IFRS 16 adoption on the consolidated financial statements. It is not practicable to provide a reasonable estimate of the financial effect until management completes their review.

IFRS 17 Insurance Contracts.

IFRS 17, Insurance Contracts ("IFRS 17") was issued in May 2017 and supersedes IFRS 4, Insurance Contracts ("IFRS 4") as at 1 January 2021. IFRS 17 requires insurance liabilities to be measured at a current fulfillment value and provides a more uniform measurement and presentation approach for all insurance contracts. These requirements are designed to achieve the goal of a consistent, principle-based accounting for insurance contracts. It is not practicable to provide a reasonable estimate of the effect of IFRS 17 until a detailed review has been completed by management.

Amendments to IFRSs

The IASB has published a number of amendments to IFRSs, which are effective from 1 January 2019. The management expects they will have an insignificant effect on the consolidated financial statements of the Group. The Group has not early adopted any of the amendments effective after 31 December 2018.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

4. Revenue by Segments

The Group reports its business in four operating segments as described in Note 1 under Kaspi.kz Segments.

Revenue by segments as at and for years ended 31 December 2018, 2017 and 2016 is presented below:

	Year ended	Year ended	Year ended
	31 December	31 December	31 December
	2018	2017	2016
REVENUE	375,331	275,753	223,303
Marketplace	25,020	12,174	6,469
Seller fees Payments	25,020	12,174	6,469
	26,471	9,571	5,053
Interest revenue Transaction and Membership	8,595	4,042	2,289
Revenue	17,876	5,529	2,764
e-Finance	22,099	9,757	5,273
Interest Revenue Fees & Commissions Consumer Financial Services	21,940	9,736	5,228
	159	21	45
	301,741	244,251	206,508
Interest Revenue Fees & Commissions Transaction & Membership Revenue Other gains/(losses)	164,531	144,193	121,507
	140,100	106,820	89,483
	1,379	219	5
	(4,269)	(6,981)	(4,487)

Revenue classification and distribution among segments is performed in accordance with the following guidelines:

Marketplace revenue includes seller fees paid by merchants and other partners when sale is closed within Marketplace Platform.

Payments revenue includes transaction fees originated from processing payments for regular household needs, payments for purchases both online and in-store, other debit card transactions, online money wire transfers within Kaspi Ecosystem, both inside the country and globally, and transactions by SME and corporate customers. It also includes membership and annual fees paid by individual customers, SME and corporate customers for engagement in Kaspi Ecosystem. The Payments Platform segment also derives treasury revenue from cash balances.

E-Finance revenue includes interest income from financing customers which is originated online through Mobile App or to finance purchases on Marketplace Platform, third party merchant sites and third-party mobile apps.

Consumer Financial Services revenue includes interest income from financing customers and from other financial assets. It also includes banking fees and commissions, membership and other fees paid by customers of Shopping Club, income/loss from revaluation, securities, interbank and derivatives, and fees/commissions from other banking services.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

5. Segment Reporting

Operating segments are reported in a manner consistent with the internal reporting provided to the management of the Group. Starting from 2018, the Group implemented changes in how the management operates the businesses of the Group to maximize efficiency in allocating resources and assessing performance. Consequently, the Group presents four operating and reportable segments as set out in Notes 4 and 5 to reflect this change and corresponding items of segment information for 2017 and 2016 years have been restated.

Previously, the Group had two operating segments, namely the (1) Mass market retail and (2) Corporate, SME and other.

The Group presents segment information after elimination of inter-Group transactions. In general, revenue, cost of revenue, technology & product development expenses, sales & marketing expenses, general & administrative expenses, provision expenses are directly attributable, or are allocated, to each segment.

The Group allocates costs and expenses that are not directly attributable to a specific segment, such as those that support general infrastructure and customer engagement across Kaspi Ecosystem, to different segments mainly on the basis of usage, revenue, headcount, active customers, depending on the nature of the relevant costs and expenses.

The following tables present the summary of each segments revenue, net revenue and net income for the years ended 31 December 2018, 2017 and 2016:

	Year ended 31 December 2018	Year ended 31 December 2017	Year ended 31 December 2016
REVENUE	375 _, 331	275,753	223,303
Marketplace	25,020	12,174	6,469
Payments	26,471	9,571	5,053
e-Finance	22,099	9,757	5,273
Consumer Financial Services	301,741	244,251	206,508
NET REVENUE	230,649	145,707	111,371
Marketplace	23,801	11,316	5,964
Payments	18,103	5,679	3,482
e-Finance	8,787	2,397	1,489
Consumer Financial Services	179,958	126,315	100,436
NET INCOME	111,119	71,294	5,742
Marketplace	14,560	5,806	1,934
Payments	6,731	1,360	1,137
e-Finance	(878)	(463)	(428)
Consumer Financial Services	90,706	64,591	3,099

Operating segments are reported in a manner consistent with internal reports, which are reviewed and used by management and board of directors (who are identified as Chief Operating Decision Makers, "CODM").

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Segment revenue reported above represents revenue generated from external customers. There were no inter-segment sales in 2018, 2017 and 2016. Segment profit represents the net income earned by each segment. This is the measure reported to the CODM for the purposes of resource allocation and assessment of segment performance.

As at 31 December 2018, 2017 and 2016, no information on segment assets or liabilities is presented to the CODM.

For the years ended 31 December 2018 and 2017, 2016, 95%, 94% of 97% revenues from external customers were attributable to customers from Kazakhstan, respectively.

As at 31 December 2018, 2017 and 2016, all non-current assets other than financial instruments, deferred tax assets, post-employment benefit assets, and rights arising under insurance contracts, respectively, were located in Kazakhstan.

6. Revenue

Revenue includes interest revenue, fees, commissions, seller fees, transaction & membership revenue and other gains/(losses).

	Year ended 31 December 2018	Year ended 31 December 2017	Year ended 31 December 2016
REVENUE	375,331	275,753	223,303
Interest Revenue	195,066	157,971	129,024
Fees & Commissions	140,259	106,841	89,528
Seller Fees	25,020	12,174	6,469
Transaction & Membership Revenue	19,255	5,748	2,769
Other gains/(losses)	(4,269)	(6,981)	(4,487)

Interest revenue includes interest originated on loans to customers, securities and deposits placed with banks, only.

Fees & commissions revenue mainly includes banking service fees and commissions.

Banking service fees are charged on a monthly basis, and include the following services of Kaspi Ecosystem, such as access to wide network of Kaspi ATMs with free cash withdrawals up to certain limits, 24-hour service line support, charge-free transfers between Kaspi clients' accounts and bill payments for services via kaspi.kz website and mobile application, SMS and mobile push notification services.

Seller fees includes fees paid by merchants from shopping transaction originated during both online and in store shopping. The Group earns seller fees when transactions are completed on the Marketplace Platform and are generally determined as a percentage based on the value of merchandise and services being sold by merchants.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

The Group earns transaction and membership revenues when processing payments and engaging customers in Kaspi Ecosystem. This includes transaction fees paid by merchants when the Group enables various payment and purchase transactions. It also includes membership fees paid by customers and merchants for accessing various Kaspi Ecosystem services.

Other gains/(losses) is mainly due to net gains/(losses) on foreign exchange operations and financial assets and liabilities at fair value through profit or loss. For the years ended 31 December 2018, 2017 and 2016, the net gain/(loss) on financial assets and liabilities at fair value through profit or loss amounted to KZT 8,425 million, KZT (14,291) million and KZT (9,210) million, respectively. For the years ended 31 December 2018, 2017 and 2016, the net (loss)/gain on foreign exchange operations amounted to KZT (12,040) million, KZT 7,436 million and KZT 4,582 million, respectively.

7. Cost of revenue

Cost of revenue includes interest expense, transaction expenses and operating expenses which are directly attributable for the Group's everyday operating activities.

	Year ended 31 December 2018	Year ended 31 December 2017	Year ended 31 December 2016
COST OF REVENUE	(144,682)	(130,046)	(111,932)
Interest Expenses	(102,685)	(97,126)	(85,944)
Transaction Expenses	(6,709)	(3,288)	(2,259)
Operating Expenses	(35,288)	(29,632)	(23,729)

Interest expenses include interest expenses on customer accounts, mandatory insurance of retails deposits and debt securities, including subordinated debt.

Transaction expenses are mainly composed of the costs associated with accepting, processing and otherwise enabling payment transactions. Those costs include fees paid to payment processors, payment networks and various service providers.

Operating expenses include costs incurred to operate retail network, 24-hour call support and communication with customers, product packaging, loan origination and risk assessment, customer deposit acquisition and other expenses which can be attributed to the Group's operating activities related to the origination and delivery of the products and services.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Employee benefits, depreciation and amortisation expenses and operating lease expenses for the years ended 31December 2018, 2017 and 2016 are presented as follows:

		31 Decem	ear ended ber 2018				Year ended 31 December 2016		
	Employee benefits	Deprecia- tion & amortisa- tion t	Opera- ing lease	Employee benefits	Deprecia- tion & amortisa- tion	Opera- ting lease	Employee benefits	Deprecia- tion & Amortisa- tion	Opera-
Cost of Revenue	(15,443)	(401)	(1,287)	(13,949)	(425)	(1,241)	(12,466)	(359)	(1,186)
Sales & Marketing Technology & Product	(351)	-	•	(294)	-	-	(242)	*	-
Development General & Administrative	(7,396)	(3,357)	(1,002)	(6,385)	(2,803)	(962)	(5,058)	(2,125)	(912)
expenses	(3,079)	(1,374)	(3,157)	(5,283)	(1,505)	(3,053)	(3,680)	(2,043)	(2,410)
Total	(26,269)	(5,132)	(5,446)	(25,911)	(4,733)		(21,446)	(4,527)	(4,508)

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Kaspi.kz Joint Stock Company

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

8. Provision expense

The movements in loss allowance were as follows:

		Loans		Due from	Financial assets at fair value through other comprehensive	l assets e through prehensive	Cash and cash equiva-	Other	Continge	
•		to customers	5	banks	income	me	lents	assets	ncies	
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 1	Stage 3	Stage 1	Stage 3	Stage 1	Total
Loss allowance for										
Sodo	1	1		1						
2018	11,154	3,351	88,009	3	209	•	15	1,741	17	17 104,499
Changes in provisions										
 Transfer to Stage 1 	244	(167)	(77)	•	1	•	1	•	,	•
 Transfer to Stage 2 	(189)	209	(20)	1	•	•	•	•	•	1
 Transfer to Stage 3 	(1,132)	(2,092)	3,224	ı	ı	1	•	•	1	٠
Net changes, resulting			•							
from changes in credit										
risk parameters	812	6,641	55,314	1	146	1,940	(10)	228	1	65.071
Write off, net of			•					!		1
recoveries	•	•	(31,877)	1	1	•	٠	83	•	(31.794)
New assets issued or										() () ()
acquired	16,022	•	•	7	54	•	1	2	25	16,108
Matured or									}	
derecognized assets										
(except for write off)	(5,718)	(914)	(21,968)	1	•	•		•	1	(28.600)
Foreign exchange		•								
difference	•	•	(31)	က	•	•	(1)	11	1	(18)
As at 31 December		:								
2018	21,193	7,028	92,574	13	409	1,940	4	2,063	42	42 125.266

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

	Loans to customers (Note 13)	Investments available- for-sale	Other assets	Total
31 December 2016	83,509	65	1,406	84,980
Provision expense	27,269	-	474	27,743
Write-off of assets	(48,015)	-	(184)	(48,199)
Foreign exchange difference Recoveries of assets previously	150	-	(99)	51
written off	27,235		144	27,379
31 December 2017	90,148	65	1,741	91,954

	Loans to customers (Note 13)	Investments available- for-sale	Other assets	Total
31 December 2015	64,995	65	1,139	66,199
Provision expense	75,930	(14)	285	76,201
Write-off of assets	(75,507)	-	(19)	(75,526)
Foreign exchange difference Recoveries of assets previously	(169)	-	`(1)	(170)
written off	18,260	14	2	18,276
31 December 2016	83,509	65	1,406	84,980

9. Income tax

The Group provides for taxes for the current period based on the tax accounts maintained and prepared in accordance with the tax regulations of the Republic of Kazakhstan, where the Group and its subsidiaries operate and which may differ from IFRS.

The Group is subject to certain permanent tax differences due to non-tax deductibility of certain expenses and a tax free regime for certain income.

Deferred taxes reflect the net tax effects of temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for tax purposes. Temporary differences as at 31 December 2018, 2017 and 31 December 2016 relate mostly to different methods of income and expense recognition as well as to recorded values of certain assets.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Deferred income tax (liabilities)/assets as at 31 December 2018, 2017 and 2016 comprise:

	31 December 2018	31 December 2017	31 December 2016
Vacation reserve and accrued bonuses	510	1,624	1,790
Property, equipment and intangible assets	(2,343)	(2,053)	(1,964)
Tax losses carried forward	-	-	3,339
Other		5	25
Net deferred tax (liability)/asset	(1,833)	(424)	3,190

Relationships between tax expenses and accounting profit for years ended 31 December 2018, 2017 and 2016 are explained as follows:

	Year ended 31 December 2018	Year ended 31 December 2017	Year ended 31 December 2016
Net income before income tax	135,237	84,779	8,883
Tax at the statutory tax rate of 20% Non-taxable income Non-deductible expense Adjustments related to prior years	27,047 (4,367) 1,438	16,956 (3,909) 438	1,777 (151) 286 651
Change in unrecognized deferred tax assets and effect of unused tax losses			578
Income tax expense	24,118	13,485	3,141
Current income tax expense Deferred income tax expense	22,699 1,419	9,861 3,624	2,877 264
Income tax expense	24,118	13,485	3,141

During 2018, 2017 and 2016, non-taxable income was represented by interest income on governmental and other qualified securities in accordance with the tax legislation.

	31 December 2018	31 December 2017	31 December 2016
Net deferred tax liability/(asset):			
At the beginning of the period	424	(3,190)	(3,443)
Change in deferred income tax balances		(-,,	(-, - , - ,
recognized in equity	(10)	(10)	(11)
Change in deferred income tax balances	· /	()	()
recognized in profit or loss	1,419	3,624	264
At the end of the period	1,833	424	(3,190)

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Tax, currency and customs legislations of the Republic of Kazakhstan are subject to varying interpretations and changes, which can occur frequently. Management's interpretation of such legislation as applied to the transactions and activity of the Group may be challenged by the relevant regional and state authorities. Fiscal periods remain open to review by the authorities in respect of taxes for five calendar years proceeding the year of review.

As at 31 December 2018, 2017 and 2016, management believes that its interpretation of the relevant legislation is appropriate and that the Group's tax, currency and customs positions will be sustained. Significant additional actual taxes, penalties and interest may be assessed following any challenges by the relevant authorities, which could have a material impact on the Group's reported net result.

10. Earnings per share

	31 December 2018	31 December 2017	31 December 2016
Net income attributable to the shareholders of the Company Less: dividends on preference shares declared in	105,540	65,278	5,269
respect of the period Less: dividends on preferred shares that would	-	(3,192)	-
be paid on full distribution of income		(13,071)	(1,110)
	105,540	49,015	4,159
Weighted average number of ordinary shares for			
basic and diluted earnings per share	156,133,699	157,500,000	157,500,000
Earnings per share — basic and diluted			
(KZT)	676	311	26

The 2017 and 2016 weighted average shares used to compute basic and diluted EPS were retroactively restated to reflect the 1:105 split made in July 2018.

11. Cash and cash equivalents

	31 December 2018	31 December 2017	31 December 2016
Cash on hand Current accounts with other banks	88,374 13,613	64,468 165,157	57,719 29,583
Short-term deposits with other banks Reverse repurchase agreements	64,013 2,471	74,052	41,884
Total cash and cash equivalents	168,471	1,162 304,839	28,203 157,389

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Cash on hand includes cash balances with ATMs and cash in transit. As at 31 December 2018, 2017 and 2016 fair value of collateral of reverse repurchase agreements, classified as cash and cash equivalents, amounted to KZT 3,336 million, KZT 1,709 million and KZT 28,314 million, respectively.

12. Investment securities and derivatives

Investment securities and derivatives comprise:

	31 December 2018	31 December 2017	31 December 2016
Total financial assets at fair value through OCI (2017 and 2016: investments available-			
for-sale) Total financial assets at fair value through	356,689	212,508	216,514
profit or loss	9,942	27	75,426
Total investment securities and			
derivatives	366,631	212,535	291,940

Financial assets at fair value through OCI (2017 and 2016: Investments available-for-sale) comprise:

	31 December 2018	31 December 2017	31 December 2016
Debt securities Equity investments	356,311 378	212,256 252	216,228 286
Total financial assets at fair value through OCI (2017 and 2016: investments available-for-sale)	356,689	212,508	216,514

As at 31 December 2018, 2017 and 2016, sovereign debt securities of KZT 311,604 million, KZT 176,266 million, KZT 181,414 million, respectively, was included in debt securities.

Financial assets at fair value through profit or loss comprise:

	31 December 2018	31 December 2017	31 December 2016
Financial assets held for trading:			· · · · · · · · · · · · · · · · · · ·
Derivative financial instruments	9,942	27	75.426
Total financial assets held for			.0/120
trading	9,942	27	75,426

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

As at 31 December 2016, financial assets at fair value through profit or loss included KZT/USD swap instruments with NBRK, which amounted to KZT 75,413 million with notional amount of KZT 231,306 million that were settled in 2017. As at 31 December 2017, other financial assets at fair value through profit or loss included swaps and options in the amount of KZT 27 million with notional amount of KZT 22,198 million and financial liabilities at fair value through profit or loss included forwards in the amount of KZT 1,312 million with notional amount of KZT 57,485 million. As at 31 December 2018, financial assets at fair value through profit or loss included swap and spot instruments in the amount of KZT 98 million with notional amount of KZT 63,408 million and forwards in the amount of KZT 9,844 million with notional amount of KZT 135,513 million.

13. Loans to customers

	31 December 2018	31 December 2017	31 December 2016
e-Finance	203,876	79,084	34,350
Consumer Financial Services	983,921	902,387	764,212
Total gross loans to customers Less: allowance for impairment losses	1,187,797	981,471	798,562
(Note 8)	(120,795)	(90,148)	(83,509)
Total net loans to customers	1,067,002	891,323	715,053

As at 31 December 2018, 2017 and 2016, accrued interest of KZT 31,883 million KZT 39,201 million, KZT 38,260 million, respectively, was included in loans to customers.

Loans with principal or accrued interest in arrears for more than 90 days are classified as "Non-performing loans" ("NPL"). Allowance for impairment to gross NPLs reflects the Group's ability to absorb potential losses from non-performing loans. Considering the ratio represents impairment loan loss allowances for the specific pool as a percentage of NPLs, the ratio can be more than 100%. With the adoption of IFRS 9, these loans were classified in stage 3. The following tables set forth the Group's outstanding NPLs as at the dates indicated:

	Gross NPLs	Allowance for impairment	Allowance for impairment to gross NPLs
e-Finance	6,687	7,547	113%
Consumer Financial Services	100,199	113,248	113%
Total non-performing loans to customers		-	
as at 31 December 2018	106,886	120,795	113%

Consumer Financial Services

as at 31 December 2016

Total non-performing loans to customers

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

	Gross NPLs		Allowance for impairment to gross NPLs
e-Finance	2,117	1,597	75%
Consumer Financial Services	79,344	88,551	112%
Total non-performing loans to customers as at 31 December 2017	81,461	90,148	111%
	Gross NPLs	Allowance for impairment	Allowance for impairment to gross NPLs
e-Finance	2,266	1.541	68%

71,984

74,250

1,541

81,968

83,509

114%

112%

Provision expense for the years ended 31 December 2018, 2017 and 2016:

	Year ended 31 December 2018	Year ended 31 December 2017	Year ended 31 December 2016
Provision expense:			
e-Finance	(6,019)	(682)	(904)
Consumer financial services	(46,560)	(27,061)	(75,297)
Total provision expenses	(52,579)	(27,743)	(76,201)

As 31 December 2018, 2017 and 2016, the Group did not provide loans, which individually exceeded 10% of the Group's equity.

During 2016, the Group implemented significant changes to its overdue loan collection procedures. This has resulted in substantially improved collection results for such loans. To reflect these improvements, changes have been introduced to the loan loss provision methodology. Previously, any collection of loan amounts past due over 360 days was considered insignificant and for provision calculation purposes was not considered in the calculation. However, actual collection amounts past due over 360 days became material in 2017, and accordingly collections are now considered for loan loss provision calculation purposes for amounts up to 1,080 days past due.

14. Property, equipment and intangible assets

	Buildings				
	and	Furniture		Construc-	
	construc-	and	Intangible	tion in	
	tion	equipment	assets	progress	Total
At initial/revalued cost					
31 December 2015	20,539	20,300	5,744	-	46,583
Acquisition of subsidiary	-	1	489	-	490
Additions	568	3,592	2,729	27	6,916
Disposals	(553)	(515)	(37)		(1,105)
31 December 2016	20,554	23,378	8,925	27	52,884
Additions	750	2,072	2,260	-	5,082
Transferred to investment		·	•		.,
property	(852)	-	-	-	(852)
Disposals	(751)	(217)	(79)	(27)	(1,074)
31 December 2017	19,701	25,233	11,106	-	56,040
Additions	218	7,267	2,358	172	10,015
Disposals	(347)	(459)	(41)	-	(847)
31 December 2018	19,572	32,041	13,423	172	65,208
Accumulated depreciation and impairment					···
31 December 2015	4,646	8,754	2,355	_	15,755
Acquisition of subsidiary	-	-	20	-	20
Charge for the year	893	2,650	964	-	4,507
Eliminated on disposals	(306)	(466)	(15)	-	(787)
31 December 2016	5,233	10,938	3,324	-	19,495
Charge for the year	777	2,923	1,033	-	4,733
Transferred to investment		·	·		,
property	(31)	-	~	-	(31)
Eliminated on disposals	(143)	(189)		<u>-</u>	(332)
31 December 2017	5,836	13,672	4,357	-	23,865
Charge for the year	618	3,187	1,327	•	5,132
Eliminated on disposals	(82)	(395)	-	-	(477)
31 December 2018	6,372	16,464	5,684		28,520
Net book value					
31 December 2018	13,200	15,577	7,739	172	36,688
31 December 2017	13,865	11,561	6,749	•	32,175
31 December 2016	15,321	12,440	5,601	27	33,389

As at 31 December 2018, 2017 and 2016, property and equipment included fully depreciated property and equipment of KZT 6,544 million, KZT 5,408 million and KZT 4,087 million respectively.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

The fair value of buildings and construction was determined based on the market comparable approach that reflects recent transaction prices for similar properties and was carried out by independent valuers not related to the Group. There has been no change to the valuation technique during the year. In measuring fair value of Group's buildings and construction, the measurements categorized into Level 3. During the years 2018, 2017 and 2016, there were no movements between Level 3 and other levels.

Items included in buildings and construction are stated at revalued amounts. As at 31 December 2018, 2017 and 2016, the net book value of those items, that would have been recognised had the assets been carried under the cost model totaled KZT 13,200 million, KZT 13,865 million and KZT 15,321 million, respectively.

In 2018, 2017 and 2016, management of the Group performed analysis of the property market and concluded that there were no significant changes in the fair value since the latest property revaluation date.

15. Other assets

	31 December 2018	31 December 2017	31 December 2016
Other financial assets:			
Prepayments for customers online			
transactions	4,468	5,713	4,037
Receivables from VISA and Master	·	·	,,
Card transactions	2,893	1,937	399
<u>Other</u>	8,192		2,232
	15,553	9,972	6,668
Less: allowance for impairment losses	(1,342)	(1,188)	(1,277)
Total other financial assets	14,211	8,784	5,391
Other non-financial assets:	7,282	4,535	7,096
Less: allowance for impairment losses	(720)	(553)	(129)
Total other non-financial assets	6,562	3,982	6,967
Total other assets	20,773	12,766	12,358

Movements in allowances for impairment of other assets for the years ended 31 December 2018, 2017 and 2016 are disclosed in Note 8.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

16. Due to banks

	31 December 2018	31 December 2017	31 December 2016
Recorded at amortized cost:			
Repurchase agreements	49	23,044	_
Time deposits of banks and other	-	•	
financial institutions		40,156	40,272
Total due to banks	49	63,200	40,272

As at 31 December 2018, 2017 and 31 December 2016, accrued interest of KZT 0 million KZT 294 million and KZT 277 million, respectively, was included in due to banks.

Fair value of collateral of repurchase agreements, which were classified as due to banks as at 31 December 2018, 2017 and 31 December 2016, amounted to KZT 51 million, KZT 23,744 million and nil.

17. Customer accounts

	31 December 2018	31 December 2017	31 December 2016
Individuals			
Term deposits	1,025,099	828,734	712,891
Current accounts	124,971	50,806	30,947
Total due to individuals	1,150,070	879,540	743,838
Corporate customers			
Term deposits	41,684	71,857	39,652
Current accounts	41,166	28,242	30,637
Total due to corporate customers	82,850	100,099	70,289
Total customer accounts	1,232,920	979,639	814,127

As at 31 December 2018, 2017 and 2016, accrued interest of KZT 7,573 million, KZT 6,038 million and KZT 5,652 million, respectively, was included in customer accounts.

As at 31 December 2018, 2017 and 2016, customer accounts of KZT 7,997 million, KZT 6,418 million and KZT 655 million, respectively, were held as security against loans, letters of credit, guarantees issued by the Group and other transactions related to contingent obligations.

As at 31 December 2018, 2017 and 2016, customer accounts of KZT 78,531 million (6.4%), KZT 103,651 million (10.6%) and KZT 85,675 million (10.5%), respectively, were due to top twenty customers.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

18. Debt securities issued

	Currency	Maturity date month/ year	Nominal interest rate	31 December 2018	31 December 2017	31 December 2016
Second bond program -						
fourth issue	KZT	February 2018	8.00	-	10,285	10,283
Second bond program –					•	•
fifth issue	KZT	June 2018	8.00	-	1,603	1,603
Third bond program – first issue Third bond program –	KZT	January 2025	9.90	51,041	51,040	51,039
second issue Third bond program –	KZT	January 2024	9.80	48,408	48,407	48,405
third issue	KZT	January 2023	9.70	38,645	-	-
Total debt securities issued				138,094	111,335	111,330

As at 31 December 2018, 2017 and 2016, accrued interest of KZT 5,620 million, KZT 4,318 million and KZT 4,318 million, respectively, was included in debt securities issued. All debt securities issued are recorded at amortised cost as at 31 December 2017 and 2016. The Group did not have any defaults or other breaches with respect to its debt securities during the years ended 31 December 2018, 2017 and 2016.

19. Other liabilities

	31 December 2018	31 December 2017	31 December 2016
Other financial liabilities:			
Payables for customers' online			
transactions	5,536	8,372	2,900
Payables for Visa and Master Card		·	•
transactions	3,004	6,544	1,306
Accrued expenses	1,255	1,162	831
Accrued dividends payable to non-			
controlling interest	900	1,432	-
Derivative financial liabilities	-	1,312	-
Other	89	55	49
Total financial liabilities	10,784	18,877	5,086
Other non-financial liabilities:			
Accumulated employee benefits	1,268	6,895	7,801
Employee Vacation reserves	1,315	1,250	1,173
Current income tax payable	1,618	965	110
Other taxes payable	784	176	146
Deferred tax liabilities	1,833	424	60
Other	2,851	703	453
Total non-financial liabilities	9,669	10,413	9,743
Total other liabilities	20,453	29,290	14,829

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

20. Subordinated debt

	Currency	Maturity date month/ year	Nominal interest rate, %	31 December 2018	31 December 2017	31 December 2016
First bond program –			2.5% plus			
third issue First bond program –	KZT	June 2018	inflation rate 2% plus	-	3,912	3,843
fourth issue First bond program –	KZT	July 2019	inflation rate 2% plus	6,221	6,273	6,448
fifth issue Second bond program -	KZT	July 2019	inflation rate 1% plus	5,563	5,499	5,561
first issue Second bond program –	KZT	July 2021 February	inflation rate 2% plus	9,981	9,941	9,975
third issue Third bond program –	KZT	2023	inflation rate	5,569	5,686	5,812
fourth issue Debt component of	KZT	June 2025	10.7	62,259	62,257	62,255
preference shares	<u>KZT</u>	n/a	n/a	10	11	11
Total subordinated debt				89,603	93,579	93,905

Debt component of preference shares relates to subsidiary Kaspi bank JSC, and held by non-controlling interest. As at 31 December 2018, 2017 and 2016, accrued interest of KZT 4,120 million, KZT 4,310 million and KZT 4,803 million, respectively, was included in subordinated debt. All subordinated debt are recorded at amortised cost as at 31 December 2018, 2017 and 2016. The above liabilities are subordinated to the claims of depositors and other creditors of the issuer in the event of liquidation. The Group did not have any defaults or other breaches with respect to its subordinated debt during the years ended 31 December 2018, 2017 and 2016.

Reconciliation of liabilities arising from financing activities

The table below details changes in the Group's liabilities arising from financing activities, including both cash and non-cash changes. Liabilities arising from financing activities are those for which cash flows were, or future cash flows will be, classified in the Group's consolidated statement of cash flows as cash flows from financing activities.

			Non-	cash changes	
	1 January 2018	Financing cash flows	Foreign exchange movement	Changes in amortised cost	31 December 2018
Debt securities issued Subordinated debt	111,335 93,579	25,393 (3,924)	-	1,366 (52)	•
			Non-c	ash changes	
	1 January 2017	Financing cash flows	Foreign exchange movement	Changes in amortised cost	31 December 2017

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

21. Share capital

The table below provides a reconciliation of the change in the number of authorized shares, shares issued and fully paid, treasury shares and shares outstanding as at 31 December 2018, 2017 and 2016:

	Authorised shares	Issued and fully paid shares	Treasury shares	Shares outstanding
Ordinary shares				
1 January 2016 Movement	1,500,000	1,500,000	<u> </u>	1,500,000
31 December 2016	1,500,000	1,500,000		1,500,000
Movement			-	-
31 December 2017	1,500,000	1,500,000	_	1,500,000
Share split (1:105) Purchase of treasury shares Conversion of preference shares into ordinary shares (1:1)	157,500,000 - 52,500,000	157,500,000	16,320,000	157,500,000 (16,320,000) 42,000,000
31 December 2018	210,000,000	199,500,000	16,320,000	183,180,000
Preference shares				
1 January 2016 Movement	500,000	400,000	-	400,000
31 December 2016	500,000	400,000	-	400,000
Movement	-		-	-
31 December 2017	500,000	400,000	-	400,000
Share split (1:105) Conversion of preference shares into	52,500,000	42,000,000	-	42,000,000
ordinary shares (1:1) 31 December 2018	(52,500,000)	(42,000,000)	- -	(42,000,000)

On 9 July 2018, the Group completed a stock split of one pre-split ordinary and preference share for 105 post-split ordinary and preference shares, respectively.

During the year ended 31 December 2018, the Group repurchased 16,320,000 ordinary shares at a market price for the total amount of KZT 72,287 million.

In December 2018, the Group converted all preference shares into ordinary shares based on a ratio of 1-for-1.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

The table below provides a reconciliation of the change in the amount of outstanding shares issued and fully paid as at 31 December 2018, 2017 and 31 December 2016:

	Preference shares	Ordinary shares	Total
Balance at 1 January 2016 Movements	27,400	102,744	130,144
31 December 2016	27,400	102,744	130,144
Movements		-	
31 December 2017	27,400	102,744	130,144
Purchase of treasury shares Conversion of preference shares into ordinary	•	(75,287)	(75,287)
shares (1:1)	(27,400)	27,400	-
31 December 2018	•	54,857	54,857

All shares are KZT denominated. The Group has one class of ordinary shares which carry no right to fixed income. Share premium represents an excess of contributions received over the nominal value of shares issued and amounts received as a result of the resale of shares over their purchase price.

According to legislation of Kazakhstan on Joint Stock companies, dividend payments on the preference shares cannot be less than the dividends paid on ordinary shares. Preference shares are entitled to receive KZT 0.04 per share preference dividend before any dividends are declared to the ordinary shareholders.

During the years ended 31 December 2018, 2017 and 2016, the Group declared dividends of KZT 0.03, KZT 7,980.03 and KZT 0.04 per preference share, respectively.

During the years ended 31 December 2018, 2017 and 2016, the Group declared dividends of KZT nil, KZT 7,980 and KZT nil per ordinary share, respectively.

22. Commitments and contingencies

In the normal course of business the Group is a party to financial instruments with off-balance sheet risk in order to meet the needs of its customers. Guarantees issued included below represent financial guarantees, where payment is not probable as at the respective reporting date, and therefore have not been recorded in the consolidated statement of financial position.

The Group's maximum exposure to credit loss under contingent liabilities and commitments to extend credit, in the event of non-performance by the other party where all counterclaims, collateral or security prove valueless, is represented by the contractual amounts of those instruments.

The Group uses the same credit policy in undertaking contingent commitments as it does for on-balance operations.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

As at 31 December 2018, 2017 and 2016, provision for losses on contingent liabilities amounted to KZT 42 million, KZT nil and KZT nil, respectively.

As at 31 December 2018, 2017 and 2016, the Group's contingent liabilities and credit commitments comprised the following:

	31 December 2018	31 December 2017	31 December 2016
	Nominal amount	Nominal amount	Nominal amount
Contingent liabilities and credit commitments	-		
Commitments on loans and unused			
credit lines: Revocable loans	61,320	55,202	42,922
Total commitments on loans and unused			
_credit lines	61,320	55,202	42,922
Guarantees issued and similar			
commitments	1,409	1,793	2,068
Total contingent liabilities and credit commitments	62,729	56,995	44.990

As at 31 December 2018, 2017 and 2016, commitments on loans and unused credit lines represent the Group's revocable and irrevocable commitments to extend loans within unused credit line limits. Those commitments where the borrower has to apply each time it wants to draw the credit facility from unused credit lines and the Group may approve or deny the extension of the credit facility based on the borrower's financial performance, debt service and other credit risk characteristics are considered to be revocable. Those commitments where the Group is contractually obliged with no conditions to extend the loan are considered as irrevocable.

Legal proceedings

From time to time and in the normal course of business, claims against the Group are received from customers and counterparties. Management is of the opinion that no material losses will be incurred and respectively no provision has been made in these consolidated financial statements.

Pensions and retirement plans

Employees of the Group receive pension benefits from pension funds in accordance with the laws and regulations of the Republic of Kazakhstan. As at 31 December 2018, 2017 and 2016, the Group was not liable for any supplementary pensions, post-retirement health care, insurance benefits, or retirement indemnities to its current or former employees.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Operating environment

Emerging markets such as Kazakhstan are subject to different risks than more developed markets, including economic, political and social, and legal and legislative risks. Laws and regulations affecting businesses in Kazakhstan continue to change rapidly, tax and regulatory frameworks are subject to varying interpretations. The future economic direction of Kazakhstan is heavily influenced by the fiscal and monetary policies adopted by the government, together with developments in the legal, regulatory, and political environment. Because Kazakhstan produces and exports large volumes of oil and gas, its economy is particularly sensitive to the price of oil and gas on the world market.

During the last quarter of 2018, the oil price decreased significantly, which led to a decrease in national export revenue. This might put some pressure towards weakening of the tenge against major foreign currencies.

Management of the Group is monitoring developments in the current environment and taking measures it considered necessary in order to support the sustainability and development of the Group's business in the foreseeable future. However, the impact of further economic developments on future operations and financial position of the Group might be significant.

23. Transactions with related parties

In considering each possible related party relationship, attention is directed to the substance of the relationship, and not merely the legal form. The Group had the following transactions outstanding as at 31 December 2018, 31 December 2017 and 31 December 2016 with related parties:

	31 De	Year ended	31 December 2017		Year end 31 December 20	
	Transactions	Total category as per financial	Transactions	Total category as per financial	Transactions	Total category as per financial
	with related parties	statements captions	with related parties	statements captions	with related parties	statements captions
Consolidated statement of financial position			"-			
Loans to customers - key management	1,529	1,187,797	1,396	981,471	1,308	798,562
personnel of the Group	1,518		1,396		1,308	
- other related parties	11		-		-	
Allowance for losses on loans to customers - key management	(1)	(120,795)	(181)	(90,148)	-	(83,509)
personnel of the Group - other related parties	(1)		(181)		-	
Customer accounts - key management	11,603	1,232,920	14,892	979,639	8,482	814,127
personnel of the Group	4,103		1,384	-	721	
- other related parties	7,500		13,508	-	7,761	-

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Compensation to directors and other members of key management is presented as follows:

	Dece	r ended 31 mber 2018 Total category as	Year ended 31 December 2017 Total category as		Year ended 31 December 2016	
	Transactions with related parties	per financial statements caption	Transactions with related parties	per financial statements caption		Total category as per financial statements caption
Compensation to key management personnel: Employee benefits	(5,177)	(26,269)	(3,034)	(25,911)	(496)	(21,446)

During the years ended 31 December 2018, 2017 and 2016 interest income from transactions with key management personnel amounted to KZT 122 million, KZT 104 million and KZT 104 million, respectively. During the years ended 31 December 2018, 2017 and 2016 interest expense from transactions with key management personnel amounted to KZT 233 million, KZT 169 million and KZT 95 million, respectively, and other related parties amounted to KZT 122 million, KZT 344 million and KZT 966 million, respectively. During the years ended 31 December 2018, 2017 and 2016 transaction costs attributable to loans to customers and paid to other related parties on a arm's length basis, amounted KZT 4,515 million, KZT 1,132 million and KZT 82 million, respectively.

24. Fair value of financial instruments

a. Fair value of financial instruments

IFRS defines fair value as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

b. Fair value of the Group's financial assets and financial liabilities measured at fair value on a recurring basis

Some of the Group's financial assets and financial liabilities are measured at fair value at the end of each reporting period. The following table gives information about how the fair values of these financial assets and financial liabilities are determined (in particular, the valuation technique(s) and inputs used).

Notes to Consolidated Financial Statements (Continued)
For the Years Ended 31 December 2018, 2017 and 2016
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e V	Quoted bid prices	Qouted prices in markets that are not active or DCF method. Future cash flows are estimated based on forward exchange rates (from observable forward exchange rates at the end of the reporting period) and contract forward rates, discounted at a rate that reflects the credit risk of various counterparties.	DCF method. Discounted cash flows based on observable market yield for similar quoted debt instruments.	Adjusted net assets based on most recent published financial statements of unlisted companies with discount for marketability and liquidity. Discount ratios varies from 10% to 30%.	DCF method. Future cash flows are estimated based on forward exchange rates (from observable forward exchange rates at the end of the reporting period) and contract forward rates, discounted at a rate that reflects the credit risk of various counterparties.	DCF method. Future cash flows in USD discounted using the LIBOR rate obtained from available sources. Future cash flows in KZT discounted using the internal rate of return, which was calculated based on the LIBOR and foreign exchange rates obtained from available sources. The difference between net present values of these discounted cash flows should be equal to nil at initial recognition. 3.8% p.a. KZT implied rate is significant unobservable input. The greater the KZT implied rate – the lower the fair value of derivative.	DCF method. Future cash flows are estimated based on forward exchange rates (from observable forward exchange rates at the end of the reporting period) and contract forward rates, discounted at a rate that reflects the credit risk of various counterparties.
Fair value hierarchy	Level 1	Level 2	Level 2	Level 3	Level 2	Level 3	Level 2
Fair value as at 31 December 2016	216,302	143	•	•	12	75,413	•
	212,284	155	,	٠	26	•	1,312
Fair value as at Fair value as at 31 December 31 December 2018 2017	353,201	310	3,108	70	9,942	•	1
Financial assets/ financial liabilities	Non-derivative financial assets at fair value through other comprehensive income (2017, 2016: investments available-for-sale)	Non-derivative financial assets at fair value through other comprehensive income (2017, 2016: investments available-for-sale)	Non-derivative financial assets at fair value through other comprehensive income (2017; investments available-for-sale)	Unlisted Equity investments classified as financial assets at fair value through other comprehensive income	Derivative financial assets (Note 12)	Derivative financial assets (NBRK SWAPs) (Note 12)	Derivative financial liabilities (Note 12)

As at 31 December 2017 and 2016, AFS investments included equity shares of KZT 70 million and KZT 69 million, which did not have a quoted market price in an active market and thus were measured at cost.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

The reconciliation of Level 3 fair value measurements of financial assets is presented as follows:

	Financial assets (Level 3)
At 31 December 2015	92,123
Total gain or losses: - in profit or loss Settlements	(1,561) (15,148)
At 31 December 2016	75,414
Total gain or losses: - in profit or loss Settlements	(3,941) (71,473)
At 31 December 2017	
1 January 2018 (restated due to IFRS 9) Purchases Total gain or losses:	70
- in profit or loss	-
Settlements	-
At 31 December 2018	70

There were no transfers between Level 1 and Level 2 in the period.

c. Fair value of financial assets and financial liabilities that are not measured at fair value on a recurring basis (but fair value disclosures are required).

Except as detailed in the following table, management of the Group considers that the carrying amount of financial assets and financial liabilities recognised in the consolidated financial statements approximate their fair values.

	31 D	ecember 2018	
	Carrying amount	Fair value	Fair value hierarchy
Loans to customers Customer accounts Debt securities issued Due from banks Subordinated debt	1,067,002 1,232,920 138,094 22,872 89,603	1,090,414 1,205,660 133,085 22,500 83,320	Level 3 Level 2 Level 1 Level 2 Level 1,2*
	31 D	ecember 2017	
	Carrying amount	Fair value	Fair value hierarchy
Loans to customers Customer accounts Debt securities issued Subordinated debt	891,323 979,639 111,335 93,579	881,941 967,667 106,283 87,597	Level 3 Level 2 Level 1 Level 1,2*

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016

(in millions of KZT)

	31 De	cember 2016			
	Carrying amount	Fair value	Fair value hierarchy		
Loans to customers	715,053	709,601	Level 3		
Customer accounts	814,127	752,261	Level 2		
Debt securities issued	111,330	105,680	Level 1		
Subordinated debt	93,905	88,167	Level 1,2*		

^{*}As at 31 December 2018, 2017 and 2016, fair value of subordinated debt that was measured using Level 2 valuation technique amounted to KZT 11 million, KZT 11 million, respectively.

Loans to customers

Loans to individual customers are made at fixed rates. Fair value of fixed rate loans has been estimated by reference to the market rates available at the reporting date for loans with similar maturity profile.

Debt securities issued, subordinated debt

Debt securities issued and subordinated debt are valued using quoted prices.

Customer accounts

The estimated fair value of term deposits is determined by discounting contractual cash flows using interest rates currently offered for deposits with similar terms. For current accounts, the Group considers fair value to equal carrying value, which is equivalent to the amount payable on the balance sheet date.

Information about measurement hierarchy of property, equipment and intangible assets is disclosed in Note 14.

Due from banks

The estimated fair value of term due from banks is determined by discounting the contractual cash flows using interest rates currently offered for due from banks with similar terms.

Due to banks

The estimated fair value of term due to banks is determined by discounting the contractual cash flows using interest rates currently offered for due to banks with similar terms.

Assets and liabilities for which fair value approximates carrying value

For financial assets and liabilities that have a short term maturity (less than 3 months), it is assumed that the carrying amounts approximate to their fair value. This assumption is also applied to demand deposits and savings accounts without a maturity.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

25. Regulatory matters

The management of JSC Kaspi Bank (subsidiary of the Company) monitor capital adequacy ratio based on requirements of standardized approach of Basel Committee of Banking Supervision "Basel III: A global regulatory framework for more resilient banks and banking systems" (December 2010, updated in June 2011). The capital adequacy ratios calculated on the basis of JSC Kaspi Bank's consolidated financial statements under Basel III are presented in the following table:

	31 December 2018	31 December 2017	31 December 2016
Capital adequacy ratios: Tier 1 capital Total capital	16.8% 23.0%	13.9% 20.9%	12.3% 18.4%

As at 31 December 2018, 2017 and 2016, JSC Kaspi Bank had complied with NBRK's capital requirements. The following table presents the Bank's capital adequacy ratios in accordance with the NBRK requirements:

	31 December 2018	31 December 2017	31 December 2016
Capital adequacy ratios:			-
Ratio k1	11.4%	11.0%	11.2%
Ratio k1.2	11.4%	11.0%	11.2%
Ratio k.2	15.7%	16.5%	13.6%

26. Risk management policy

The Group permanently advances it's risk management environment, to fit up-to-date challenges and risks the Group is exposed to. The Group is exposed to following types of risks: credit risk, liquidity risk, market risk.

Credit risk

The Group is exposed to credit risk, which is the risk that a customer will be unable to pay amounts in full when due. The Group's credit risk exposure arises primarily from our consumer finance business through the Consumer Financial Services and e-Finance Platforms. To manage credit risk during loan origination the Group centralized all processes related to decision making, verification and accounting through it's headquarters. The Group has developed an automated, centralised and big data-driven proprietary loan approval process that enables it to make instant credit decisions. The risk management block is responsible for maintaining scoring models and decision-making process. The quality of approved loans are monitored by risk management block on day-to-day basis with periodical validation of the models.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

During the credit decision process, the Group uses proprietary risk algorithms and predictive scoring models for the evaluation of the risks of potential borrowers using statistical modelling based on (i) a wealth of proprietary internal data such as application, transactional, behavioural, shopping and payment history information, which is supplemented by (ii) external data such as data received from credit bureaus (LLC First Credit Bureau and LLC State Credit Bureau) and pension centre (the State Pension Payment Centre) with regard to each customer.

The additional proprietary data constantly accumulated around the Group's customers' activity within it's Ecosystem that enables it to continuously deepen it's credit decision process.

The risk management block, in terms of credit risk, consists of independent modelling, antifraud, monitoring and provisioning division.

Maximum Exposure

The Group's maximum exposure to credit risk varies significantly and is dependent on both individual risks and general market economy risks. For financial assets recorded on statement of financial position, the maximum exposure equals to a carrying value of those assets prior to any offset or collateral. For financial guarantees and other contingent liabilities the maximum exposure to credit risk is the maximum amount the Group would have to pay if the guarantee was called on or in the case of commitments, if the loan amount was called on.

As at 31 December 2018, 2017 and 2016, the maximum exposure to credit risk after offset and collateral was equal to its carrying value of all financial assets except for loans to customers.

As at 31 December 2018, 2017 and 2016, the maximum exposure to credit risk after offset and collateral of loans to customers, was amounted to KZT 813,650 million, KZT 682,377 million and KZT 466,104 million, respectively.

Collateral held as security and other credit enhancements

The Group holds collateral or other credit enhancements to mitigate credit risk associated with financial assets. The main types of collateral obtained are as follows:

- For reverse repurchase transactions securities;
- For commercial lending charges over real estate properties and vehicles.

Although, the Group use collateral as credit enhancement to mitigate its exposure to credit risk, major part of its loan portfolio is represented by unsecured loans. Thus, as at 31 December 2018, 2017 and 2016, unsecured gross carrying amount of loans to customers amounted to KZT 877,837 million, KZT 705,790 million and KZT 504,884 million, respectively.

As at 31 December 2018, credit impaired loans with net carrying value of KZT59,172 million were either fully or partially collateralized, reflecting the extent to which collateral and other credit enhancements mitigate credit risk.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Credit quality of financial assets

The table below present information about the significant changes in the gross carrying amount of loans during the period that contributed to changes in the loss allowance during the year ended 31 December 2018:

	Stage 1 12-month ECL	Stage 2 Lifetime ECL	Stage 3 Lifetime ECL	Total
Loans at amortized cost				
Gross carrying amount as at 1 January 2018	770,757	34,580	176,134	981,471
Changes in the gross carrying amount				
- Transfer to stage 1	1,603	(1,135)	(468)	-
- Transfer to stage 2	(25,736)	25,791	(55)	-
- Transfer to stage 3	(77,229)	(27,028)	104,257	_
New financial assets originated			•	
or purchased	776,056	-	-	776,056
Financial assets that have been				·
repaid	(491,291)	(7,727)	(8,804)	(507,822)
Write-offs	-	-	(61,878)	(61,878)
Other changes	-	•	(30)	(30)
Gross carrying amount as at			• •	\/
31 December, 2018	954,160	24,481	209,156	1,187,797

The Group uses an internal rating model to classify individually significant loans to customers in different risk categories:

	Stage 1 12-month	Stage 2 Lifetime	Stage 3 Lifetime		
	ECL	<u>ECL</u>	ECL_	POCI	Total
Loans to customers that individually assessed for impairment					
Grades: Low to fair risk	42,094	-	-	-	42,094
Grades: Monitoring	-	-	10,126	-	10,126
Grade: High risk	-	-	70,518	13,785	84,303
Loans to customers that collectively assessed for			,	25,7.00	0 1/303
impairment	912,066	24,481	114,727	-	1,051,274
Total gross carrying					3,33,37,37
amount	954,160	24,481	195,371	13,785	1,187,797
Loss allowance	(21,193)	(7,028)	(81,611)	(10,963)	(120,795)
Carrying amount as at				,,,	(===/// 30)
31 December, 2018	932,967	17,453	113,760	2,822	1,067,002

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

		31	December 2017	31 December 2016
Loans to customers that individually asse Grades: Low to fair risk Grades: Monitoring	ssed for impairmen	t:	60,944 14,637	99,339
Grade: High risk Loans to customers that collectively asset	ssed for impairmen	t:	81,462 824,428	51,108 648,115
Total gross carrying amount			981,471	798,562
Loss allowance			(90,148)	(83,509)
Carrying amount			891,323	715,053
		31 Decen	nber 2018	
	Stage 1 12-month ECL	Stage 2 Lifetime ECL	Stage 3 Lifetime ECL	
Due from banks High grade (A- and higher)	18,242			
Investment grade (BBB+ - BBB-)	101	-	-	- 18,242 - 101
Non-Investment grade (BB+ - B-) Low grade (CCC+ and lower)	4,542	-		- 4,542
Total gross carrying amount	22,885	-		22,885
Loss allowance	(13)	_		
Carrying amount as at 31 December 2018	22,872			22,872
		31 Decemb	er 2018	<u> </u>
	Stage 1	Stage 2	Stage 3	_
	12-month ECL	Lifetime ECL	Lifetime ECL	Total
Investment securities and derivatives				
High grade (A- and higher) Investment grade (BBB+ - BBB-)	1,799 322,683	-	-	1,799 322,683
Non-Investment grade (BB+ - B-) Low grade (CCC+ and lower)	39,041	-	3,108	•
Carrying amount as at 31 December 2018	363,523	_	3,108	366,631

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Financial assets, other than loans to customers and other financial asets, are graded according to their external credit ratings issued by an international rating agencies, such as Standard and Poor's, Fitch and Moody's Investors Services. The highest possible rating is AAA.

	A- and higher	BBB+ to BBB-	BB+ to B-	Not rated	Total
Gross carrying value:					
31 December 2018					
Cash and cash equivalents, net of cash on hand	29,304	43,488	5,773	1,532	80,097
Mandatory cash balances with NBRK		17,215	-	-,	17,215
Due from banks	18,242	101	4,542	-	22,885
Investment securities and derivatives	1,799	322,683	42,149	-	366,631
31 December 2017					
Cash and cash equivalents, net of cash on hand	27,777	203,026	7,973	1,595	240,371
Mandatory cash balances with NBRK	· -	10,870	-	-,	10,870
Due from banks	4,773	3,560	-	1	8,334
Investment securities and derivatives	-	196,167	16,368	-	212,535
31 December 2016					
Cash and cash equivalents, net of cash on hand	15,052	78,960	4,386	1,272	99,670
Mandatory cash balances with NBRK	-	7,684	-	-	7,684
Due from banks	733	820	-	1	1,554
Investment securities and derivatives	-	273,197	18,499	245	291,940

As at 1 January 2018 and 31 December 2018 all loan commitments and financial guarantee contracts of the Group are classified in Stage 1 (12-month ECL) and have "low to fair" risk grade.

Modified financial assets.

As a result of the Group's forbearance activities financial assets might be modified. The following tables refer to modified financial assets where modification does not result in derecognition. Financial assets (with loss allowance based on lifetime ECL) modified during the 2018 year:

Gross carrying amount before modification	17,595
Net amortised cost before modification	10,873
Net modification gain/(loss) Net amortised cost after modification	10.072
Financial assets modified since initial recognition at a time when loss allowance was based on	10,873
lifetime ECL	17,595
Gross carrying amount of financial assets for which loss allowance has changed in the period from lifetime to 12-month ECL cost after modification	2

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Macro sensitivity

The Group has performed a sensitivity analysis on how ECL on the main portfolios will change if the key assumptions used to calculate ECL change by 1 percentage point. For the purpose of ECL estimation the Group takes growth rate of real GDP at 3.25% and 3.14% for years 2019 and 2020 respectively as the baseline scenario, 5.08% and 4.95% for years 2019 and 2020 respectively as upside scenario and 1.46% and 1.33% for years 2019 and 2020 respectively as downside scenario. Change in baseline growth rate of real GDP by +/-1 percentage point with respective correction of upside and downside scenarios lead to change in loss allowance amount by KZT -4,375/+4,336 million respectively.

a. Liquidity risk

The liquidity management framework of the Group mainly consists of following instruments:

- Assessment of sufficient level of high quality liquid assets
- Cash flow forecasting
- Diversification of funding
- Social media marketing
- Up-to-date contingent funding plan

The liquidity risk is managed considering specific aspects of Kazakhstan economy, in particular limited funding instruments and possible dollarization due to currency devaluation expectations.

The Group devote great significance to social media marketing, to support the brand of the Group and mitigate various risks such as liquidity and reputational risks. The division of social media marketing covers mass media, social networks, blogs and other sources of information, available to current or potential customers.

Major part of the Group's obligations consists of customer accounts of individuals, with nominal maturity under 2 years. However 99.9% of deposits in 2018 were rolled over, that ensures Group with reliable and long-term funding base. Average amount of customer accounts is around KZT 908 thousand, which is another indicator of diversification and stability of the funding base.

The Group retains significant amount of high quality liquid assets, that consists mainly from cash, deposits within NBRK, short-term and mid-term notes of NBRK and bonds of Ministry of finance of Republic of Kazakhstan.

b. Market risk

Price Risk

The Group's market risk arises from fluctuations in the value of financial instruments because of changes in market prices whether those changes are caused by factors specific to the individual instrument or factors affecting all instruments traded in the market. The Group has established various limits on operations with securities, including instrument specific limits, in order to balance profit and risk in the securities portfolio. The Group's portfolio is predominantly comprised of Kazakhstan government debt securities.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Currency risk

The Group manages it's currency risk by keeping modest open currency position. The Group does issue loans to customers only in tenge, which protects the Group from hidden currency risk in case of currency devaluation.

Interest rate risk

Contractual maturities of assets and liabilities of the Group has modest gaps, which provides possibilities of instant reactions on changes of market interest rates. The Group has significant amounts of high quality liquid assets with short maturity which helps to minimizes sensitivity to sharp increase of interest rate in case of liquidity shortfall on the market.

An analysis of the liquidity and interest rate risks is presented in the following table.

FINANCIAL ASSETS	Up to 1 month	1 month to 3 months	3 months to 1 year	1 year to 5 years	Over 5 years	31 December 2018 Total
Interest bearing financial						
assets Non-interest bearing	399,366	224,207	465,647	264,844	141,271	1,495,335
financial assets	153,452	2,815	4,767		_	161,034
TOTAL FINANCIAL ASSETS	552,818	227,022	470,414	264,844	141,271	1,656,369
FINANCIAL LIABILITIES AND COMMITMENTS				201/017	242,272	1,030,309
Total Interest bearing financial liabilities Non-interest bearing	68,845	120,911	560,266	367,683	178,434	1,296,139
financial liabilities	175,305	5	_	_	_	175,310
Total financial liabilities	244,150	120,916	560,266	367,683	178,434	1,471,449
Guarantees issued and similar commitments	72	14	8	2002	1,315	1,409
Total financial liabilities and						
commitments	244,222	120,930	560,274	367,683	179,749	1,472,858
Liquidity gap Cumulative liquidity gap	308,596 308,596	106,092 414,688	(89,860) 324,828	(102,839) 221,989	(38,478) 183,511	
Interest sensitivity gap Cumulative interest	330,521	103,296	(94,619)	(102,839)	(37,163)	
sensitivity gap	330,521	433,817	339,198	236,359	199,196	

As at 31 December 2018, 2017 and 2016, guarantee deposits in favour of international payments systems included in due from banks amounted to KZT 18,322 million, KZT 8,328 million and KZT 5,316 million, respectively.

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

	Up to 1 month	1 month to 3 months	3 months to 1 year	1 year to 5 years	Over 5 years	31 December 2017 Total
FINANCIAL ASSETS				7 - 7 - 7 - 7 - 7 - 7 - 7 - 7 - 7 - 7 -	, , , ,	
Interest bearing financial assets	219,171	201,277	385,654	248,195	125,532	1,179,829
Non-interest bearing financial assets	255,328	206	1,322	-	-	256,856
TOTAL FINANCIAL ASSETS	474,499	201,483	386,976	248,195	125,532	1,436,685
FINANCIAL LIABILITIES AND COMMITMENTS				110/233		1,430,003
Total interest bearing financial liabilities Non-interest bearing	105,409	268,654	523,167	92,690	184,118	1,174,038
financial liabilities Total financial	87,637	511	4,444	-	-	92,592
liabilities	193,046	269,165	527,611	92,690	184,118	1,266,630
Guarantees issued and similar commitments	315	316	5	20	1,137	1,793
Total financial						2,732
commitments	193,361	269,481	527,616	92,710	185,255	1,268,423
Liquidity gap	281,138	(67,998)	(140,640)	155,485	(59,723)	
Cumulative liquidity gap	281,138_	213,140	72,500	227,985	168,262	
Interest sensitivity gap Cumulative interest	113,762	(67,377)	(137,513)	155,505	(58,586)	
sensitivity gap	113,762	46,385	(91,128)	64,377	5,791	
	Up to	1 month to	3 months	1 year to	Over	31 December 2016
FINANCIAL ASSETS	Up to 1 month	1 month to 3 months	3 months to 1 year	1 year to 5 years	Over 5 years	
Total interest bearing financial assets	•			5 years	5 years	2016 Total
Total interest bearing	1 month	3 months	to 1 year 272,077			2016 Total 947,649
Total interest bearing financial assets Non-interest bearing financial assets	222,636 170,439	3 months 129,286 7,630	272,077 53,293	5 years 196,702	5 years 126,948	2016 Total 947,649 231,362
Total interest bearing financial assets Non-interest bearing financial assets Total financial assets FINANCIAL LIABILITIES AND COMMITMENTS	1 month 222,636	3 months	to 1 year 272,077	5 years	5 years	2016 Total 947,649
Total interest bearing financial assets Non-interest bearing financial assets Total financial assets FINANCIAL LIABILITIES AND COMMITMENTS Total interest bearing financial liabilities	222,636 170,439	3 months 129,286 7,630	272,077 53,293	5 years 196,702	5 years 126,948	2016 Total 947,649 231,362
Total interest bearing financial assets Non-interest bearing financial assets Total financial assets FINANCIAL LIABILITIES AND COMMITMENTS Total interest bearing financial liabilities Non-interest bearing financial liabilities	222,636 170,439 393,075	3 months 129,286 7,630 136,916	272,077 53,293 325,370	5 years 196,702 - 196,702	5 years 126,948 - 126,948	2016 Total 947,649 231,362 1,179,011
Total interest bearing financial assets Non-interest bearing financial assets Total financial assets FINANCIAL LIABILITIES AND COMMITMENTS Total interest bearing financial liabilities Non-interest bearing	222,636 170,439 393,075	3 months 129,286 7,630 136,916	272,077 53,293 325,370	196,702 - 196,702 373,983	5 years 126,948 - 126,948	2016 Total 947,649 231,362 1,179,011
Total interest bearing financial assets Non-interest bearing financial assets Total financial assets FINANCIAL LIABILITIES AND COMMITMENTS Total interest bearing financial liabilities Non-interest bearing financial liabilities Total financial	222,636 170,439 393,075 32,438 63,233	3 months 129,286 7,630 136,916 77,919	272,077 53,293 325,370 329,999 409	196,702 - 196,702 373,983 764	126,948 126,948 187,148	2016 Total 947,649 231,362 1,179,011 1,001,487 64,406 1,065,893
Total interest bearing financial assets Non-interest bearing financial assets Total financial assets FINANCIAL LIABILITIES AND COMMITMENTS Total interest bearing financial liabilities Non-interest bearing financial liabilities Total financial liabilities Guarantees issued and irrevocable credit commitments Total financial liabilities and	1 month 222,636 170,439 393,075 32,438 63,233 95,671	3 months 129,286 7,630 136,916 77,919 465	272,077 53,293 325,370 329,999 409 330,408	196,702 - 196,702 373,983 764 374,747	126,948 126,948 187,148 187,148	2016 Total 947,649 231,362 1,179,011 1,001,487 64,406 1,065,893
Total interest bearing financial assets Non-interest bearing financial assets Total financial assets FINANCIAL LIABILITIES AND COMMITMENTS Total interest bearing financial liabilities Non-interest bearing financial liabilities Total financial liabilities Guarantees issued and irrevocable credit commitments Total financial liabilities and commitments	222,636 170,439 393,075 32,438 63,233 95,671 208	3 months 129,286 7,630 136,916 77,919 465 78,384	272,077 53,293 325,370 329,999 409 330,408	196,702 196,702 196,702 373,983 764 374,747 241	126,948 126,948 187,148 187,148 1,141 188,289	2016 Total 947,649 231,362 1,179,011 1,001,487 64,406 1,065,893
Total interest bearing financial assets Non-interest bearing financial assets Total financial assets FINANCIAL LIABILITIES AND COMMITMENTS Total interest bearing financial liabilities Non-interest bearing financial liabilities Total financial liabilities Guarantees issued and irrevocable credit commitments Total financial liabilities and commitments Liquidity gap	222,636 170,439 393,075 32,438 63,233 95,671 208	3 months 129,286 7,630 136,916 77,919 465 78,384 58,532	272,077 53,293 325,370 329,999 409 330,408 13 330,421 (5,051)	196,702 196,702 373,983 764 374,747 241 374,988 (178,286)	126,948 126,948 187,148 187,148 1,141 188,289 (61,341)	2016 Total 947,649 231,362 1,179,011 1,001,487 64,406 1,065,893
Total interest bearing financial assets Non-interest bearing financial assets Total financial assets FINANCIAL LIABILITIES AND COMMITMENTS Total interest bearing financial liabilities Non-interest bearing financial liabilities Total financial liabilities Guarantees issued and irrevocable credit commitments Total financial liabilities and commitments Liquidity gap Cumulative liquidity gap Interest sensitivity gap	222,636 170,439 393,075 32,438 63,233 95,671 208 95,879 297,196 297,196	3 months 129,286 7,630 136,916 77,919 465 78,384 58,532 355,728	272,077 53,293 325,370 329,999 409 330,408 13 330,421 (5,051) 350,677	196,702 196,702 373,983 764 374,747 241 374,988 (178,286) 172,391	126,948 126,948 187,148 187,148 1,141 188,289 (61,341) 111,050	2016 Total 947,649 231,362 1,179,011 1,001,487 64,406 1,065,893
Total interest bearing financial assets Non-interest bearing financial assets Total financial assets FINANCIAL LIABILITIES AND COMMITMENTS Total interest bearing financial liabilities Non-interest bearing financial liabilities Total financial liabilities Guarantees issued and irrevocable credit commitments Total financial liabilities and commitments Liquidity gap Cumulative liquidity gap	222,636 170,439 393,075 32,438 63,233 95,671 208	3 months 129,286 7,630 136,916 77,919 465 78,384 58,532	272,077 53,293 325,370 329,999 409 330,408 13 330,421 (5,051)	196,702 196,702 373,983 764 374,747 241 374,988 (178,286)	126,948 126,948 187,148 187,148 1,141 188,289 (61,341)	2016 Total 947,649 231,362 1,179,011 1,001,487 64,406 1,065,893

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Liquidity gap is negative only in long maturity periods if taken cumulative. Nevertheless, based on prior experience, the Group considers it highly unlikely that all customer accounts seek repayment on maturity. Historically the majority of such deposits are rolled over.

Interest rate sensitivity analysis

The Group manages fair value interest rate risk through periodic estimation of potential losses that could arise from adverse changes in market conditions. The Risk Management Department conducts monitoring of the Group's current financial performance, estimates the Group's sensitivity to changes in fair value interest rates and its influence on the Group's profitability.

The sensitivity analysis includes interest rate risk, which has been determined based on "reasonably possible changes in the risk variable". The level of these changes is determined by management and is contained within the risk reports provided to key management personnel.

As at December 2017 impact on profit before tax due to \pm -3% change in interest rate amounted KZT -/+820 million (2017: KZT -/+939 million, 2016: KZT -/+906 million). Impact on equity before tax due to \pm -3% change in interest rate amounted KZT -2,535/+2,800 million (2017: -7,626/+8,493 million, KZT 2016: KZT -2,124/+1,407 million).

Currency risk

The Group's exposure to foreign currency exchange rate risk is presented in the table below:

	Tenge	USD 1 USD = KZT 384.20	EUR EUR 1 = KZT 439.37	Other currency	31 December 2018 Total
Non-derivative financial assets					
Total non-derivative financial assets	1,483,196	148,488	8,809	5,968	1,646,461
Non-derivative financial liabilities Total non-derivative financial liabilities	1,135,626	329,436	6,008	379	
NET POSITION ON NON- DERIVATIVE FINANCIAL INSTRUMENTS	347,570	(180,948)	2,801	5,589	1,471,449 175,012
Derivative financial instruments Accounts payable on spot and					470,042
derivative contracts Accounts receivable on spot	(287,445)	(384)	(33,392)	(5,543)	(326,764)
and derivative contracts	141,885	168,357	33,392	+	343,634
NET POSITION ON DERIVATIVE FINANCIAL					
INSTRUMENTS	(145,560)	167,973	-	(5,543)	16,870
NET POSITION	202,010	(12,975)	2,801	46	191,882

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016

(in millions of KZT)

	Tenge	USD 1 USD = KZT 332.33	EUR EUR 1 = KZT 398,23	Other	31 December 2017
Non-derivative financial assets	1 00130	1121 002403	NET 370,23	currency	Total
Total non-derivative financial assets	1,138,400	290,247	3,910	4,117	1,436,674
Non-derivative financial liabilities Total non-derivative financial liabilities	895,827	360,734	9,810	267	1,266,638
NET POSITION ON NON- DERIVATIVE FINANCIAL INSTRUMENTS	242,573	(70,487)	(5,900)	3,850	
Derivative financial instruments					- <u>.</u>
Accounts payable on spot and derivative contracts Accounts receivable on spot	(80,090)	(2,426)	•	(3,827)	(86,343)
and derivative contracts NET POSITION ON	2,181	72,955	5,973	_	81,109
DERIVATIVE FINANCIAL INSTRUMENTS	(77,909)	70,529	5,973	(3,827)	
NET POSITION	164,664	42	73	23	
		USD 1 USD =	EUR EUR 1 =	Other	31 December 2016
Non-derivative financial	Tenge	KZT 333.29	KZT 352.42	currency	Total
assets Total non-derivative financial assets	950,653	129,622	10.577		
Non-derivative financial liabilities	330,033	125,022	19,652	3,658	1,103,585
Total non-derivative financial liabilities	684,498	361,431	19,662	302	1,065,893
NET POSITION ON NON- DERIVATIVE FINANCIAL INSTRUMENTS	355.45-	4			
Derivative financial	266,155	(231,809)	(10)	3,356	
Accounts payable on spot and derivative contracts Accounts receivable on spot and derivative contracts	(72,734)	231,306		(7,923)	(80,657)
NET POSITION ON DERIVATIVE FINANCIAL INSTRUMENTS	(72,734)	231,306		/7 0001	231,306
NET POSITION	193,421		(40)	(7,923)	
	170,741	(503)	(10)	(4,567)	

Notes to Consolidated Financial Statements (Continued) For the Years Ended 31 December 2018, 2017 and 2016 (in millions of KZT)

Currency risk sensitivity

The Group analysed sensitivity to an increase and decrease in the USD and EUR against the KZT.25% is the sensitivity rate used when reporting foreign currency risk internally to key management personnel and represents management's assessment of the possible change in foreign currency exchange rates. The sensitivity analysis includes only outstanding foreign currency denominated monetary items and adjusts their translation at 31 December 2018 for a 25% change in foreign currency rates. The sensitivity analysis includes external loans as well as loans to foreign operations within the Group where the denomination of the loan is in a currency other than the currency of the lender or the borrower.

As at December 2018 impact on profit or loss and on equity due to +/-25% change in USD rate amounted to KZT +/-3,244 million (2017: KZT +/-11 million 2016: +/-126 million). As at December 2018 impact on profit or loss and on equity due to +/-25% change in EUR rate amounted to KZT +/-700 million (2017: KZT +/-18 million 2016: KZT +/-2 million).

27. Subsequent events

At the extraordinary general meeting of JSC Kaspi Bank's (subsidiary of the Company) shareholders on 18 January 2019, a decision was taken to carry out the voluntary delisting of JSC Kaspi Bank's shares from the official list of Kazakhstan Stock Exchange JSC.

On 7 February 2019, the Group acquired 100% share in a new subsidiary LLP Kaspi Office.