Financial Information Required by the Superintendency General of Financial Entities
Consolidated Financial Statements
March 31, 2015
(With corresponding figures for 2014)
(With Independent Auditors' Report Thereon)
(Translation into English of the original Independent Auditors' Report issued in Spanish)

# BANCO NACIONAL DE COSTA RICA AND SUBSIDIARIES CONSOLIDATED BALANCE SHEET AS OF MARCH 31, 2015 AND DECEMBER 31 AND MARCH 31, 2014 (In colones)

	Note	March 2015	December 2014	March 2014
<u>ASSETS</u>		3/1. (1)		
Cash and due from banks	4	741,390,164,875	829,976,580,984	944,526,780,031
Cash		69,633,190,739	69,196,626,393	50,501,261,839
Demand deposits in BCCR		605,277,261,002	576,311,012,910	581,950,736,653
Demand deposits in local financial entities		11,881,054,711	14,736,219,049	5,901,833,926
Demand deposits in foreign financial entities		45,023,608,116	163,881,119,963	290,271,851,269
Other cash and due from banks		9,575,050,307	5,851,602,669	15,900,918,202
Accounts and accrued interest receivable		-	-	178,142
Investments in financial instruments	5	1,163,983,551,451	1,100,793,001,081	895,278,244,080
Available for sale		1,106,196,608,332	1,052,451,509,868	860,236,514,092
Held to maturity		27,280,583,228	27,328,967,634	26,280,955,059
Derivative financial instruments - Position gap		19,879,164,304	11,281,570,780	14,324,730
Accounts and accrued interest receivable		10,720,615,591	9,791,452,357	8,804,888,645
(Allowance for impairment of investments in financial instruments)		(93,420,004)	(60,499,558)	(58,438,446)
Loan portfolio	6	3,306,853,774,201	3,303,451,574,458	3,132,520,642,840
Current		3,137,725,508,602	3,142,775,035,799	2,959,538,779,511
Past due		128,547,472,047	116,679,181,039	134,177,146,823
Legal collections		73,326,254,945	72,120,002,831	64,719,904,570
Accounts and accrued interest receivable		23,254,682,069	21,715,928,888	19,823,532,560
(Allowance for loan impairment)		(56,000,143,462)	(49,838,574,099)	(45,738,720,624)
Accounts and fees and commissions receivable	7	3,224,306,188	3,140,260,913	4,089,297,275
Fees and commissions receivable		893,922,091	1,011,708,508	745,185,348
Accounts receivable for brokerage operations		54,271,944	9,121,769	27,138,808
Accounts receivable for transactions with related parties		56,757,442	27,589,166	323,068,301
Deferred tax and income tax receivable		3,939,012,297	4,291,459,910	3,208,145,437
Other receivables		4,009,053,924	3,159,168,189	2,599,265,317
Accrued interest receivable		2,027,139	2,572,781	1,698,456
(Allowance for impairment of accounts and fees and commissions receivable)		(5,730,738,649)	(5,361,359,410)	(2,815,204,392)
Foreclosed assets	8	19,104,968,373	19,355,058,030	18,333,929,633
Assets and securities acquired in lieu of payment		76,715,068,912	76,541,792,707	75,044,623,872
Other foreclosed assets		1,756,777	1.756,777	1,756,777
(Allowance for impairment of foreclosed assets and per legal requirements)		(57,611,857,316)	(57,188,491,454)	(56,712,451,016)
Investments in other companies	9	50,522,077,695	49,855,779,811	46,372,888,124
Property and equipment, net	10	172,893,476,167	167,465,656,710	164,877,937,600
Other assets	11	44,719,913,362	51,682,157,293	39,153,654,809
Deferred charges	577	21,740,135,977	21,658,093,393	11,783,390,882
Intangible assets		4,097,022,797	4,502,747,244	2,450,913,570
Other assets		18,882,754,588	25,521,316,656	24,919,350,357
TOTAL ASSETS		5,502,692,232,312	5,525,720,069,280	5,245,153,374,392

The notes are an integral part of these consolidated financial statements.

Continued...

#### BANCO NACIONAL DE COSTA RICA AND SUBSIDIARIES CONSOLIDATED BALANCE SHEET AS OF MARCH 31, 2015 AND DECEMBER 31 AND MARCH 31, 2014 (In colones)

	(20)			
LIABILITIES AND EQUITY	Note	March 2015	December 2014	March 2014
LIABILITIES		2 (52 550 240 921	3,710,752,140,528	3,534,080,438,679
Obligations with the public	12	3,653,759,349,831	2,272,307,002,207	2,173,831,686,056
Deposits and other demand obligations		2,229,171,938,161	1,388,059,529,970	1,303,699,572,588
Deposits and other term obligations		1,364,281,469,315	31,028,841,773	39,892,329,298
Other obligations		39,984,152,088 20,321,790,267	19,356,766,578	16,656,850,737
Charges payable	**		182,746,931	22,196,355,699
Obligations with BCCR	13	171,605,579 171,585,500	182,452,312	22,193,411,054
Term obligations		20,079	294,619	2,944,645
Charges payable		U U U U U U U U U U U U U U U U U U U	1,089,524,631,830	1,086,782,914,663
Obligations with entities	14	1,144,694,733,458	284,583,917,797	230,235,644,792
Demand obligations		253,438,591,218	798,409,817,482	841,826,636,141
Term obligations		876,281,322,656	6,530,896,551	14,720,633,730
Charges payable		14,974,819,584	124,048,750,344	103,670,008,659
Accounts payable and provisions		95,521,664,192	835,751,867	1,890,683,802
Accounts payable for brokerage services		985,373,889	14,167,519,270	13,507,671,115
Deferred tax	15-е	14,357,896,442		41,565,125,026
Provisions	16	28,327,566,756	39,502,894,655	46,706,528,716
Other sundry accounts payable	17	51,850,827,105	69,542,584,552	36,464,272,866
Other liabilities	18	30,218,143,644	34,084,373,087	3,896,216,984
Deferred income		10,100,556,550	9,003,262,472	884,608,211
Allowance for stand-by credit losses		1,447,588,321	1,319,693,076	31,683,447,671
Other liabilities		18,669,998,773	23,761,417,539	31,003,447,071
Subordinated obligations	18	69,031,612,194	70,358,271,862	
Subordinated obligations Subordinated obligations		68,556,800,000	69,330,300,000	
Finance charges payable		474,812,194	1,027,971,862	4,783,193,990,566
TOTAL LIABILITIES		4,993,397,108,898	5,028,950,914,582	4,783,193,990,300
				110 120 203 497
EQUITY Share and fell		118,130,303,482	118,130,303,482	118,130,303,482
Share capital	19-a	118,130,303,482	118,130,303,482	118,130,303,482
Paid-up capital		68,392,156,211	66,252,321,126	64,857,877,088
Equity adjustments Surplus from revaluation of property and equipment	19-b	63,639,596,055	63,639,596,055	63,639,596,055
Adjustment for valuation of available-for-sale investments	19-с	(134,408,248)	(1,746,379,939)	(2,536,093,577)
Adjustment for valuation of available for sale in restricted financial instruments	19-с	(1,318,641,763)	(2,041,047,936)	(3,310,054,989)
Surplus from revaluation of other assets		70,246,625	70,246,625	70,246,625
Adjustment for valuation of investments in other companies	19-d	6,135,363,542	6,329,906,321	6,994,182,974
	1-u	248,809,086,655	216,895,556,917	209,058,123,505
Equity reserves		45,050,532,421	41,309,087,572	49,146,520,984
Prior period retained earnings		10,766,969,405	39,633,711,775	6,218,384,941
Income for the year Equity of the Development Financing Fund	49	18,146,075,240	14,548,173,826	14,548,173,826
		509,295,123,414	496,769,154,698	461,959,383,826
TOTAL EQUITY TOTAL LIABILITIES AND EQUITY		5,502,692,232,312	5,525,720,069,280	5,245,153,374,392
	20	514,368,718,532	511,255,824,426	503,005,458,047
DEBIT MEMORANDA ACCOUNTS		998,203,439,017	905,709,567,459	963,048,502,703
TRUST ASSETS	21	72,369,124,757	76,808,871,122	69,249,953,780
TRUST LIABILITIES		925,834,314,259	828,900,696,336	893,798,548,924
TRUST EQUITY		15,482,219,254	14,427,215,779	4,461,613,360
TRUST MEMORANDA ACCOUNTS			18,344,060,940,216	16,739,506,375,806
OTHER DEBIT MEMORANDA ACCOUNTS	22	18,058,609,110,258	7,557,679,197,394	6,721,012,303,168
Own debit memoranda accounts		6,887,017,593,293	2,128,036,259,000	1,862,204,225,313
Third-party debit memoranda accounts	//.	2,041,347,225,855	334,980,739,704	236,868,830,730
Own debit memoranda accounts for custodial activities		463,219,992,367	8,323,364,744,118	7,919,421,016,595
Third-party debit memoranda accounts for custodial activities	M	8,667,024,298,743	0,323,304,744,110	.,,,
	17/14			)
1 (8)	1/0/1		0	-/

Juan Carlos Corrales Salas Acting General Manager a.i.

The notes are an integral part of these consolidated financial statements.

Gerardo Góme: Solís Gereral Accountant Ricardo Araya Jiménez General Auditor

# BANCO NACIONAL DE COSTA RICA AND SUBSIDIARIES CONSOLIDATED STATEMENT OF COMPREHENSIVE INCOME FOR THE THREE MONTHS ENDED MARCH 31, 2015

(In colones)

	Note	March 2015	March 2014
Finance income			
Cash and due from banks	26	88,654,112	72,927,149
Investments in financial instruments	26	11,706,972,446	11,070,881,603
Loan portfolio	27	80,425,006,477	70,815,163,290
Gain on foreign exchange differences and development units	1-d	30,827,941,609	180,375,036,844
Gain on available-for-sale financial instruments	28	154,937,297	940,378,565
Gain on derivative instruments	5-b	7,426,650,336	6,615,356,142
Other finance income	28	9,670,777,905	4,083,979,006
Total finance income		140,300,940,182	273,973,722,599
Finance expense			
Obligations with the public	29	28,324,447,827	24,296,046,663
Obligations with BCCR		265,400	372,363
Obligations with financial entities		9,282,385,888	9,092,360,526
Other sundry accounts payable		-	90,992
Subordinated, convertible, and preferred obligations		935,833,027	•
Loss on foreign exchange differences and development units	1-d	30,452,367,462	182,774,349,561
Loss on available-for-sale financial instruments		32,303,158	400,105,280
Loss on hedged item measured at cost from fair value hedge	14	15,496,752,047	-
		67,035,054	9,664,694,372
Other finance expense		84,591,389,863	226,228,019,757
Total finance expense	30	8,721,441,573	5,284,463,827
Allowance for impairment of assets Recovery of assets and decrease in allowances	31	3,559,422,693	3,200,119,611
FINANCE INCOME		50,547,531,439	45,661,358,626
Other operating income		27.7(2.01/.0//	24,098,582,603
Service fees and commissions	32	27,763,816,866	6,107,606,886
Foreclosed assets		5,923,133,207	1,060,279,182
Gain on investments in other foreign companies	1-a	1,150,983,586	1,000,279,102
Gain on investments in other local companies		4,394,615	7,418,578,142
Foreign currency exchange and arbitrage	y 0	5,934,107,839	2,072,277,625
Other operating income	33	4,599,043,754	40,757,324,438
Total other operating income		45,375,479,867	40,757,324,436

The notes are an integral part of these consolidated financial statements.

Continued...

# BANCO NACIONAL DE COSTA RICA AND SUBSIDIARIES CONSOLIDATED STATEMENT OF COMPREHENSIVE INCOME FOR THE THREE MONTHS ENDED MARCH 31, 2015

(In colones)

	Note	March 2015	March 2014
Other operating expenses	-		
Services fees and commissions		1,677,386,425	1,715,355,130
Foreclosed assets	34	10,592,450,467	11,302,815,664
Sundry assets		961,817,912	92,329,587
Provisions	35	5,193,022,221	4,151,381,039
Discounts on fees and commissions of voluntary pension funds		17,494,293	
Foreign currency exchange and arbitrage		1,029,564	10,404,434
Other expenses with related parties		4,190,343	
Other operating expenses	36	13,724,760,868	13,239,568,681
Amortization of direct deferred costs related to loans	36	2,530,925,365	41,686,010
Total other operating expenses		34,703,077,458	30,553,540,545
GROSS OPERATING INCOME		61,219,933,848	55,865,142,519
Administrative expenses			100000000000000000000000000000000000000
Personnel expenses	37	30,164,318,961	30,857,359,424
Other administrative expenses	38	13,365,769,898	16,319,804,781
Total administrative expenses		43,530,088,859	47,177,164,205
NET OPERATING INCOME BEFORE TAXES AND			100000000000000000000000000000000000000
STATUTORY ALLOCATIONS		17,689,844,989	8,687,978,314
Income tax	15-a	3,369,392,894	797,580,345
Deferred tax		4,419	
Decrease in income tax	15-a	-	2
Decrease in prior period income tax	15-b		5,529,339
Deductible temporary differences		44,635,078	21,072,958
Statutory allocations	39	3,598,113,349	1,698,615,325
Decrease in statutory allocations	39	<u> </u>	-
INCOME FOR THE YEAR		10,766,969,405	6,218,384,941
OTHER COMPREHENSIVE INCOME, NET OF TAX			10H1 201 45H1
Adjustment for valuation of available-for-sale investments, net of income tax		1,611,971,691	(876,301,467)
Adjustment for valuation of restricted financial instruments, net of income tax		722,406,173	(564,244,131)
Adjustment for valuation of investments in other companies		(194,542,779)	3,676,904,454
OTHER COMPREHENSIVE INCOME FOR THE YEAR, NET OF TAX		2,139,835,085	2,236,358,856
TOTAL COMPREHENSIVE INCOME FOR THE YEAR		12,906,804,490	8,454,743,797
	71		

Juan Carlos Corrales Salas Acting General Manager a.t. Gerardo Gómez Solís General Accountant Ricardo Araya Jiménez General Auditor

The notes are an integral part of these consolidated financial statements.

#### BANCO NACIONAL DE COSTA RICA AND SUBSIDIARIES CONSOLIDATED STATEMENT OF CHANGES IN EQUITY FOR THE THREE MONTHS ENDED MARCH 31, 2014

(In colones)

	Equity adjustments										
	Note	Share capital	Surplus from revaluation of property and equipment	Adjustment for valuation of available-for-sale investments and restricted financial instruments	Surplus from revaluation of other assets	Adjustment for valuation of investments in other companies	Total equity adjustments	Equity reserves	Opening retained carnings	Equity of the Development Financing Fund	Total
Balances at December 31, 2013		118,130,303,482	63,639,596,055	(4,405,602,968)	70,246,625	3,317,278,520	62,621,518,232	196,909,225,981	64,525,416,596	12,243,803,201	454,430,267,492
Legal and other statutory reserves		15)	-	-		₹5		12,148,897,524	(12,148,897,524)	-	
Adjustment for changes in equity of BN Vital		-		-	5	-	-		32,495,651	-	32,495,651
Statutory allocations - Mandatory pension funds,											
Employee Protection Law No. 7983					*	B0	1 2		(958,123,114)	929	(958,123,114)
Equity of the Development Financing Fund					*			-	(2,304,370,625)	2,304,370,625	-
Total transactions with owners booked	170										
directly in equity		118,130,303,482	63,639,596,055	(4,405,602,968)	70,246,625	3,317,278,520	62,621,518,232	209,058,123,505	49,146,520,984	14,548,173,826	453,504,640,029
Comprehensive income for the year:											
Income for the year		100		(10)	F1	e.	170		6,218,384,941	9 <del>-</del> 8	6,218,384,941
Adjustment for valuation of available-for-sale investments,											
net of income tax		-		(876,301,467)	*1	-	(876,301,467)	-	-1		(876,301,467)
Adjustment for valuation of restricted financial instruments,											22 12 12 12
net of income tax		1763	( <del>-</del> )	(564,244,131)	#3	*	(564,244,131)		- 2		(564,244,131)
Adjustment for valuation of investments in other companies						3,676,904,454	3,676,904,454	-	- 4		3,676,904,454
Total comprehensive income for the year	0.00			(1,440,545,598)		3,676,904,454	2,236,358,856	-	6,218,384,941	-	8,454,743,797
Balances at March 31, 2014	19	118,130,303,482	63,639,596,055	(5,846,148,566)	70,246,625	6,994,182,974	64,857,877,088	209,058,123,505	55,364,905,925	14,548,173,826	461,959,383,826

Juan Carlos Corrales Salas Acting General Manager a i.

Gerardo Gómez Solis General Accountant

Ricardo Araya Jiménez General Auditor

The notes are an integral part of these consolidated financial statements.

#### BANCO NACIONAL DE COSTA RICA AND SUBSIDIARIES CONSOLIDATED STATEMENT OF CHANGES IN EQUITY FOR THE THREE MONTHS PERIOD ENDED MARCH 31, 2015

(In colones)

			Equity adjustments								
	Note	Share capital	Surplus from revaluation of property and equipment	Adjustment for valuation of available-for-sale investments and restricted financial instruments	Surplus from revaluation of other assets	Adjustment for valuation of investments in other companies	Total equity adjustments	Equity reserves	Opening retained earnings	Equity of the Development Financing Fund	Total
Balances at December 31, 2014		118,130,303,482	63,639,596,055	(3,787,427,875)	70,246,625	6,329,906,321	66,252,321,126	216,895,556,917	80,942,799,347	14,548,173,826	496,769,154,698
Legal and other statutory reserves							Conference State S	31,913,529,738	(31,913,529,738)	1000 Maria (1000 M	
Statutory allocations - Mandatory pension funds,											
Employee Protection Law No. 7983		-	-	-			*		(380,835,774)	18	(380,835,774)
Equity of the Development Financing Fund			E 8		:(%)				(3,597,901,414)	3,597,901,414	
Total transactions with owners booked									202 8 20 20	W 182 183	
directly in equity		118,130,303,482	63,639,596,055	(3,787,427,875)	70,246,625	6,329,906,321	66,252,321,126	248,809,086,655	45,050,532,421	18,146,075,240	496,388,318,924
Comprehensive income for the year:											
Income for the year				-			-		10,766,969,405		10,766,969,405
Adjustment for valuation of available-for-sale investments,											
net of income tax				1,611,971,691			1,611,971,691	.7			1,611,971,691
Adjustment for valuation of restricted financial instruments,											
net of income tax			-	722,406,173		7(*)	722,406,173				722,406,173
Adjustment for valuation of investments in other companies			×	-		(194,542,779)	(194,542,779)				(194,542,779)
Total comprehensive income for the year			-	2,334,377,864		(194,542,779)	2,139,835,085	/ .	10,766,969,405	-	12,906,804,490
Balances at March 31, 2015	19	118,130,303,482	63,639,596,055	(1,453,050,011)	70,246,625	6,135,363,542	68,392,156,211	248,809,086,655	55,817,501,826	18,146,075,240	509,295,123,414

Juan Carlos Corrales Salas Acting General Manager a.

Gerardo Gómez Solls General Accountant Ricardo Araya Jiménez General Auditor

The notes are an integral part of these consolidated financial statements.

#### BANCO NACIONAL DE COSTA RICA AND SUBSIDIARIES CONSOLIDATED STATEMENT OF CASH FLOWS FOR THE THREE MONTHS ENDED MARCH 31, 2015

(With corresponding figures for 2014) (In colones)

	Note	2015	2014
Net cash flows from operating activities			
Income for the year		10,766,969,405	6,218,384,941
Items not requiring cash			(1.260)
Gain on sale of idle property and equipment  Gain on foreign exchange differences and development units, net		/F F02 044 102\	(1,366)
Loss on allowance for loan impairment		(5,592,044,103)	42,563,968,656
Income for reversal of allowance for impairment of investments		8,083,835,977	1,377,216,212
Loss on allowances for foreclosed assets and other receivables		33,565,545	71,624
Loss on sale of foreclosed assets and other receivables		897,090,558 2,700,218,147	1,324,060,682
Expense (income) for provisions for severance benefits, net		(1,834,257,109)	2,804,132,757 2,060,688,041
Expense (income) for other provisions, net		3,595,576,857	2,087,365,616
Depreciation and amortization		3,623,190,026	3,332,662,168
Share in net profit of foreign associate		(1,150,983,586)	(1,060,279,182)
Statutory allocations		3,598,113,349	1,698,615,325
Deferred tax		(507,012,667)	(329,821,571)
Current tax expense	15 -a	3,369,392,894	797,580,345
Finance income on loan portfolio and investments	13 -4	(92,131,978,923)	
Finance expense on term obligations with the public and financial entities		27,570,852,192	(81,886,044,893)
Finance expense on term congations with the public and financial chities	-	(36,977,471,438)	24,261,755,414 5,250,354,769
(Increase) decrease in assets		(30,977,471,430)	3,230,334,709
Credits and cash advances		(30,380,599,901)	(49,448,999,312)
Foreclosed assets		3,358,156,566	3,557,635,147
Accrued interest receivable on other receivables		545,642	(90,372)
Other assets		5,600,004,824	(8,340,633,731)
Other assets	-	(58,399,364,307)	(48,981,733,499)
Net increase (decrease) in liabilities		(23,223,233,237)	(10,701,100,177)
Demand and term obligations		19,770,263,941	(11,674,181,224)
Other accounts payable and provisions		(35,851,930,686)	(28,153,053,927)
Other liabilities		(4,282,802,389)	7,112,577,287
		(78,763,833,441)	(81,696,391,363)
Interest received on loan portfolio and investments		89,664,062,508	85,712,963,082
Income tax paid		(797,580,345)	(931,681,740)
Interest paid on term obligations with the public and financial entities		(18,162,180,010)	(18,916,245,286)
Net cash used in operating activities	2	(8,059,531,288)	(15,831,355,307)
Cash flows from investing activities			
Increase in financial instruments (except trading)		(696,202,704,639)	(946,555,974,894)
Decrease in financial instruments (except trading)		521,009,775,547	1,038,556,489,256
Acquisition of property and equipment		(8,459,315,060)	(1,696,973,762)
Sale of property and equipment		108,104,428	94,739,521
Cash investments in other companies		(90,692,851)	(1,203,708,029)
Net cash (used in) from investing activities		(183,634,832,575)	89,194,572,092
,	-	(100,001,002,010)	05,154,072,052
Cash flows from financing activities			
Other new financial obligations		3,193,118,404	18,424,186,374
New subordinated obligations		(773,500,000)	*
Settlement of financial obligations	12	(4,256,228,021)	(31,245,447,361)
Net cash used in financing activities		(1,836,609,617)	(12,821,260,987)
Not (degrees) in greece in each and each a situation		(103 530 053 400)	ZO #11 0## = **
Net (decrease) increase in cash and cash equivalents		(193,530,973,480)	60,541,955,798
Cash and cash equivalents at beginning of year	/	1,005,007,009,161	906,647,914,809
Cash and cash equivalents at end of year	4 =	811,476,035,681	967,189,870,607
1 100			/
Land Action of the Action of t	4		DOLX

Juan Carlos Corrales Salas Acting General Manager a.i.

The notes are an integral part of these consolidated financial statements.

\_\_\_

Gerardo Gómez Solís General Accountant Rieardo Araya Jiménez General Auditor

#### Notes to Consolidated Financial Statements

March 31, 2015 (With corresponding figures for 2014)

# (1) Summary of operations and significant accounting policies

# (a) Operations

Banco Nacional de Costa Rica (the Bank) is an autonomous, independently managed, public law institution. As a State-owned bank, it is regulated by the Internal Regulations of the National Banking System (IRNBS), the Internal Regulations of the Central Bank of Costa Rica, and the Political Constitution of the Republic of Costa Rica. It is also subject to oversight by the Superintendency General of Financial Entities (SUGEF) and the Comptroller General of the Republic (CGR). The Bank's registered office is located in San José, Costa Rica.

Pursuant to current regulations, the services offered by the Bank have been divided into three departments: Commercial Banking, Mortgage Banking, and Rural Credit Banking.

Pursuant to IRNBS, if a bank divides its services into departments, its operations should be conducted through those departments based on the nature of the operations, rather than as a single banking institution. The Bank's three departments are independent from one another, except for administrative limitations established by the aforementioned regulations. Those regulations also prescribe that earnings should be calculated by combining the gains and losses of all departments and proportionally distributing the resulting net earnings to each department's equity.

Currently, due to major innovations in information technology and telecommunications, and especially because of the competition in the national and international financial sectors, the Bank has become a universal bank that offers services in all sectors of the Costa Rican market. Those services include: personal, business, corporate, and institutional banking, stock trading, pension fund management, investment funds, insurance brokerage, international banking services, and electronic banking services. The Bank aims to improve the quality of life of the largest possible number of people by offering prime financial services that promote the sustainable creation of wealth.

#### Notes to Consolidated Financial Statements

As of March 31, 2015 and 2014, the Bank has 182 offices (2014: 184 offices), 467 automated teller machines (2014: 467 automated teller machines), and, together with its subsidiaries, a total of 5,890 employees (2014: 5,943 employees). Employees are distributed as follows: Banco Nacional de Costa Rica - 5,467 employees (2014: 5,531 employees); BN Valores Puesto de Bolsa, S.A. - 78 employees (2014: 81 employees); BN Vital Operadora de Planes de Pensiones Complementarias, S.A. - 180 employees (2014: 181 employees); BN Sociedad Administradora de Fondos de Inversión, S.A. - 85 employees (2014: 83 employees); and BN Corredora de Seguros, S.A. - 80 employees (2014: 67 employees). The Bank's website is www.bncr.fi.cr.

The following subsidiaries are wholly owned by the Bank:

- BN Valores Puesto de Bolsa, S.A. (the Brokerage Firm) was organized as a corporation in 1998 under the laws of the Republic of Costa Rica to operate as a brokerage firm and carry out the brokerage activities permitted under the Securities Market Regulatory Law and the general regulations and provisions issued by the Costa Rican National Securities Commission (SUGEVAL). Its main activity is executing securities transactions on the Costa Rican National Stock Exchange (Bolsa Nacional de Valores, S.A.) on behalf of third parties. Such transactions are regulated by the Costa Rican National Stock Exchange, the regulations and provisions issued by SUGEVAL, and the Securities Market Regulatory Law.
- BN Sociedad Administradora de Fondos de Inversión, S.A. (the Investment Fund Manager) was organized as a corporation on April 29, 1998 under the laws of the Republic of Costa Rica. Its main activity is managing investment funds on behalf of third parties and managing closed and open investment funds listed in the Costa Rican National Stock Exchange and SUGEVAL.
- BN Vital Operadora de Planes de Pensiones Complementarias, S.A. (the Pension Fund Manager) was organized as a corporation on December 31, 1998. In January 1993, the Pension Fund Manager acted a voluntary pension "trust" called BN Vital. Its main activity is offering supplemental old-age and death benefit plans and promoting medium- and long-term planning and savings. Its activities are governed by Law No. 7523 of the Private Supplemental Pension Fund System and the amendments thereto, the Employee Protection Law (Law No. 7983), and the Regulations on Opening and Operating Regulated Entities and Operating Pension, Compulsory, and Voluntary Retirement Savings Funds as prescribed in the Employee Protection Law, Regulations on Regulated-Entity Investments, and the directives issued by the Pensions Superintendency (SUPEN).

#### Notes to Consolidated Financial Statements

BN Corredora de Seguros, S.A. (the Insurance Brokerage Firm) was organized as a corporation on May 19, 2009 under the laws of the Republic of Costa Rica. Its main activity is insurance brokerage for policies issued by insurance companies authorized to operate in Costa Rica. Its activities are governed by the Insurance Market Regulatory Law (Law No. 8653) and the regulations and provisions issued by the Superintendency General of Insurance (SUGESE). This entity began operations in January 2010.

The Bank holds a 49% ownership interest in the following associate:

Banco Internacional de Costa Rica, S.A. and subsidiary (BICSA) was organized under the laws of the Republic of Panama in 1976. It operates under a general license granted by the Superintendency of Banks of Panama to engage in banking operations in Panama or abroad. BICSA's registered office is located in Panama City, Republic of Panama, Calle Manuel María Icaza No. 25. BICSA has a branch in Miami, Florida, United States of America. The Bank holds a 49% ownership interest in BICSA. Banco de Costa Rica owns the remaining 51% of shares.

As of March 31, the main components that comprise the financial statements of the entities in which the Bank holds ownership interest are detailed below:

# March 2015

	_	Brokerage Firm	Pension Fund Manager	Investment Fund Manager	Insurance Brokerage Firm	BICSA
Assets	¢	62,170,545,867	7,738,396,011	5,228,866,435	1,775,111,252	458,249,052,372
Liabilities	¢	46,934,183,612	1,263,780,814	599,089,824	383,455,060	407,777,597,978
Equity	¢	15,236,362,255	6,474,615,197	4,629,776,611	1,391,656,192	50,471,454,394
Income for the year	¢	398,251,347	180,965,265	183,885,310	85,947,613	1,150,983,586
Memoranda accounts	¢	1,550,124,732,369	906,122,783,257	328,900,520,178	-	-

# March 2014

		Brokerage Firm	Pension Fund Manager	Investment Fund Manager	Insurance Brokerage Firm	BICSA
Assets	¢	61,010,404,820	7,499,081,222	4,606,574,826	1,085,345,606	406,948751,092
Liabilities	¢	46,904,623,072	1,355,971,751	814,316,141	268,286,176	360,626,486,268
Equity	¢	14,105,781,748	6,143,109,471	3,792,258,685	817,059,430	46,322,264,824
Income for the						
year	¢	216,987,385	224,658,975	196,453,354	43,586,242	1,060,279,182
Memoranda						
accounts	¢	1,426,405,920,403	776,327,182,524	305,599,519,813	-	-

#### Notes to Consolidated Financial Statements

# (b) <u>Basis of preparation</u>

# • <u>Statement of compliance</u>

The consolidated financial statements have been prepared in accordance with the accounting regulations issued by the National Financial System Oversight Board (CONASSIF), SUGEF, SUGEVAL, SUPEN, and SUGESE.

# • Basis of measurement applied to assets and liabilities

The consolidated financial statements have been prepared on the fair value basis for available-for-sale assets and derivative instruments. Other financial assets and liabilities are stated at amortized cost. The accounting policies have been consistently applied.

# (c) Basis of consolidation

#### i. Subsidiaries

Subsidiaries are entities controlled by the Bank. Control exists when the Bank has the power, directly or indirectly, to govern the financial and operating policies of an entity so as to obtain benefits from its activities. The financial statements of subsidiaries are included in the consolidated financial statements from the date that control commences until the date that control ceases.

As of March 31, 2015 and 2014, the consolidated financial statements include the financial figures of the following subsidiaries:

	Ownership
Subsidiary	interest
Brokerage Firm	100%
Pension Fund Manager	100%
Investment Fund Manager	100%
Insurance Brokerage Firm	100%

Subsidiaries were consolidated based on the following accounting principles:

 All subsidiaries which the Bank controls, whether directly or indirectly, are consolidated.

#### Notes to Consolidated Financial Statements

• For cases in which there are long-term financial or legal restrictions on the transfer of resources or for cases in which the Bank controls the subsidiary temporarily, the subsidiary is not consolidated.

# • On consolidation:

- The effect of the equity method shown in the parent's unconsolidated financial statements has been eliminated.
- Balances of accounts related to reciprocal intra-group transactions have been eliminated from the consolidated balance sheet and income statement.
- Uniform accounting policies have been applied by group entities.
- All significant intra-group balances and transactions have been eliminated. Profit or loss presented in the consolidated financial statements does not differ from profit or loss presented in the parent's unconsolidated financial statements since the subsidiaries were measured by the equity method when preparing the parent's unconsolidated financial statements.

#### ii. Associates

Associates are those entities in which the Bank has significant influence, but not control. The Bank updates the value of its associates using the equity method from the date that significant influence commences until the date significant influence ceases. As of March 31, 2015 and 2014, the Bank holds a 49% ownership interest in BICSA.

# (d) <u>Foreign currency</u>

# i. Foreign currency transactions

Assets and liabilities held in foreign currency are translated to colones at the foreign exchange rate ruling at the balance sheet date, except for transactions that have a contractually agreed exchange rate. Transactions in foreign currency during the year are translated at the exchange rates ruling on the dates of the transactions. Foreign exchange gains and losses arising on translation are recognized in the accounts corresponding to gains or losses on foreign exchange and development units (DU), as appropriate.

#### Notes to Consolidated Financial Statements

# ii. Monetary unit and foreign exchange regulations

The financial statements and notes thereto are expressed in colones  $(\phi)$ , the monetary unit of the Republic of Costa Rica.

On October 17, 2006, the Central Bank of Costa Rica (BCCR) revised the country's foreign exchange system, replacing mini-devaluations with an adjustable band. Under the new system, the Central Bank's board agreed to establish a rate floor and ceiling, which will be adjusted based on the country's financial and macroeconomic conditions. In accordance with the Chart of Accounts, assets and liabilities denominated in foreign currency should be expressed in colones using the reference buy rate published by BCCR. As of March 31, 2015, the exchange rate was established at ¢527.36 and ¢539.08 (2014: ¢538.34 and ¢553.63) to US\$1.00 for the purchase and sale of U.S. dollars, respectively.

As of March 31, 2015, the exchange rate for the purchase and sale of euros was established at  $\phi$ 555.47 and  $\phi$ 587.68 (2014:  $\phi$ 733.25 and  $\phi$ 768.25) to  $\Theta$ 1.00, respectively.

iii. Valuation method for assets and liabilities denominated in foreign currency

As of March 31, 2015, assets and liabilities denominated in U.S. dollars were valued at the exchange rate of &ppi527.36 to US\$1.00 (2014: &ppi538.34 to US\$1.00), which is the reference buy rate published by BCCR for March 31, 2015.

As of March 31, 2015, assets and liabilities denominated in euros were valued at the exchange rate of  $\phi$ 565.75 to  $\Theta$ 1.00 (2014:  $\phi$ 742.91 to  $\Theta$ 1.00). This exchange rate was calculated by multiplying the international exchange rate published by Reuters by the reference buy rate for U.S. dollars published by BCCR on the last business day of the month.

As of March 31, 2015, assets and liabilities denominated in DU were valued at the exchange rate of ¢862.66 to DU1.00 (2014: ¢831.05 to DU1.00). This exchange rate is based on the DU value tables published by SUGEVAL.

#### Notes to Consolidated Financial Statements

Valuation in colones of monetary assets and liabilities in foreign currency during the years ended March 31 gave rise to foreign exchange gains and losses, as follows:

	_	March 2015	March 2014
Foreign exchange gain	¢	30,827,941,609	180,375,036,844
Foreign exchange loss		(30,452,367,462)	(182,774,349,561)
Net gain (loss)	¢	375,574,147	2,399,312,717

Additionally, valuation of other assets and other liabilities during the year ended March 31 gave rise to gains and losses, respectively, which are booked in "Other operating income" and "Other operating expenses", respectively, as follows:

		March 2015	March 2014
Net gain on valuation of other assets	_	_	
(note 33)	¢	137,285,730	216,183,831
Net loss on valuation of other			
liabilities (note 36)		(37,323,294)	(854,285,824)
Net (loss) gain	¢	99,962,436	(638,101,993)

# iv. Financial statements of foreign operations (BICSA)

The financial statements of BICSA are presented in U.S. dollars, which is the entity's functional currency. As of March 31, 2015 and 2014, the Bank holds a 49% stake in BICSA. Accordingly, the Bank should value its investment in that entity by the equity method rather than on a consolidated basis.

The financial statements of foreign operations are translated as follows:

- Monetary assets and liabilities denominated in U.S. dollars have been translated at the closing exchange rate.
- Non-monetary assets and liabilities have been translated at the exchange rate in effect on the date of the transaction (historical rates).
- Equity balances, except profit or loss for the period, have been translated at the exchange rate in effect on the date of the transaction (historical rates).
- Income and expenses have been translated at average exchange rates for the year, except depreciation expense, which has been translated at historical rates.

#### Notes to Consolidated Financial Statements

For the year ended March 31, 2015, a foreign exchange loss in the amount of &psi(194,542,779) (2014: foreign exchange gain of &psi(3,676,904,454)) is presented in equity for the translation of the financial statements of foreign operations. As of March 31, 2015, the adjustment for valuation of investments in other companies amounts to &psi(6,135,363,542) (2014: &psi(6,994,182,974)).

# (e) <u>Financial instruments</u>

A financial instrument is any contract that gives rise to both a financial asset of one enterprise and a financial liability or equity instrument of another enterprise. Financial instruments include primary instruments, i.e. loan portfolio, investments in financial instruments, other accounts receivable, deposits from the public, financial obligations, and accounts payable.

# i. Classification

Investments in financial instruments are recognized using settlement date accounting in accordance with the Accounting Regulations Applicable to Entities Regulated by SUGEF, SUGEVAL, SUPEN, and SUGESE and to Non-financial Issuers effective as of January 1, 2008. Those investments are classified as follows:

- Investments in financial instruments of regulated entities are to be classified as available for sale.
- Own investments in open investment funds are to be classified as trading financial assets.
- Own investments in closed investment funds are to be classified as available for sale.
- Entities regulated by SUGEVAL and SUGEF may classify other investments in financial instruments as trading instruments, provided there is an express statement of intent to trade them within 90 days from the acquisition date.

Until March 31, 2007, SUGEF allowed investments in financial instruments to be classified as held to maturity.

#### Notes to Consolidated Financial Statements

As of March 31, 2015, the Bank no longer classifies financial instruments as held to maturity, except for the securities denominated in DU received from the Central Government to capitalize the Bank. Those securities were authorized by the Executive Branch of the Government of Costa Rica as a capital contribution and are funded under Law No. 8703 "Amendment to Law No. 8627 on the Ordinary and Extraordinary Budget of the Republic for Tax Year 2008."

# Trading securities

Trading securities are stated at fair value and have been acquired for the purpose of short-term profit-taking based on price variations. Variations in the fair value of these securities are recognized in net profit or loss for the year.

### Available-for-sale securities

Available-for-sale securities are financial assets that are not held for trading purposes or originated by the Bank. Available-for-sale instruments include money market placements and certain debt investments. Available-for-sale securities are stated at fair value and interest earned and amortization of premiums and discounts are recognized as income or expenses, as appropriate.

Any changes in the fair value of available-for-sale securities are recognized directly in equity until the securities are sold or considered to be impaired, at which time the cumulative gain or loss previously recognized in equity is transferred to the income statement.

# Derivative financial instruments

Derivative financial instruments are recognized initially at fair value. Subsequent to initial recognition, derivative financial instruments are stated at fair value by the fair value method. The Bank does not hold derivative financial instruments for trading purposes.

Derivative instruments accounted for by the fair value method hedge exposure to changes in the fair value of a financial liability recognized in the balance sheet. Any valuation gains or losses are recorded in the income statement.

#### Notes to Consolidated Financial Statements

The valuation methodology applied to derivative financial instruments varies depending on the type of product to be valued. In the case of foreign exchange forward contracts (FX forwards), with short credit positions and maturities generally not exceeding one year, valuation involves comparing the present value of the negotiated forward exchange rate and the current foreign exchange rate. The present value of the negotiated forward exchange rate is calculated by using the difference between the zero coupon rates. In the case of swaps (FX swap or currency swap), valuation involves two steps. In the first step, future cash flows are estimated based on current market prices. The estimation of fixed-rate cash flows does not require assumptions but variable-rate cash flows are estimated based on the rates in effect. Calculating the present value of each type of cash flows requires a valuation rate for each cash flow, which is equivalent to the base rate plus a credit spread.

For fixed-rate cash flows, the base rate is the zero coupon rate. For variable-rate cash flows, the base rate is the benchmark rate plus the spread applicable to the term of the cash flow. The spread is applicable to the Bank's cash flows receivable or payable and depends on the credit rating of the counterparty and the instruments' maturity.

# Originated loans and other receivables

Originated loans and other receivables are loans and receivables originated by the Bank providing money to a debtor other than those created with the intention of short-term profit taking. Originated loans and other receivables comprise loans and advances to banks and customers other than loans and bonds purchased from the original issuer.

The SUGEF Chart of Accounts for Financial Entities does not allow investments in financial instruments to be classified as held to maturity, except for the securities denominated in DU.

#### ii. Recognition

The Bank recognizes available-for-sale assets using settlement date accounting. From this date, any gains or losses arising from changes in the fair value of the assets are recognized in equity, except for gains and losses arising from changes in the fair value of investments in open investment funds, which are recorded in profit or loss.

Originated loans and other receivables are recognized on the date they are transferred to the Bank.

#### Notes to Consolidated Financial Statements

#### iii. Measurement

Financial instruments are measured initially at fair value, including transaction costs

Subsequent to initial recognition, all trading and available-for-sale investments and derivative instruments are measured at fair value, except that any investment or instrument that does not have a quoted market price in an active market and which fair value cannot be reliably measured is stated at cost, including transaction costs, less impairment losses. Starting September 2008 until July 31, 2013, fair values were determined using a market price valuation method established by Proveedor Integral de Precios Centroamérica, S.A. (PIPCA); and starting August 1, 2013, the price vector provided by VALMER Costa Rica, S.A. is applied. These methods have been duly approved by SUGEVAL.

For securities issued by foreign entities and listed in open systems such as Bloomberg, the permanent quotes published in these primary sources should be used. Given that the information in open systems is obtained from financial systems all over the world, the last price listed is used as the price of the security. As an exception applicable to all currencies, when it is not possible to obtain a quote from open systems, the security is valued at an amount equivalent to its purchase price.

Auction Rate Securities (ARSs) are valued using a valuation model developed by the Bank.

ARSs are valued using discounted future cash-flow models considering the instrument's options.

Cash flow discounts are based on the yield curves of municipal bonds associated to the rating of each issue. The dynamics of those yield curves are not directly analyzed; instead, they are adjusted to LIBOR caps quoted in the market using the Hull-White stochastic interest rate model.

Once the dynamic model for the rates is obtained, a trinomial tree is built for the variations in the rates using the standard Hull-White method. A term spread variable is added to this stochastic model based on a comparison of the forward LIBOR and municipal yield curves. This tree allows the instrument's options to be evaluated based on the scenarios proposed therein.

#### Notes to Consolidated Financial Statements

An additional element to be included is the benchmark interest rates for the instrument's coupons. For such purposes, the benchmark forward rates are compared with the forward LIBOR rate. Spreads, which depend on the average interest rates on student loans, are approximated using a regression analysis to correlate student rates with the LIBOR rate. The approximations derived from that analysis are sufficient to perform the valuation of ARSs, which solely depend on a benchmark rate at a specific point in time. In the case of ARSs for which payment involves a moving average of the benchmark rate and coupons (such as the ARSs issued by the Pennsylvania Higher Education Authority, PHEA), nominal quotations are determined through simplification, which are higher and lower than the quotation. In the event that those nominal quotations match, with acceptable accuracy, that result is used as the instrument's quote. The Bank's management considers that the values obtained using this valuation method represent the best estimate of the fair value of ARSs.

Internal debt Central Bank bonds received for the capitalization of State-owned banks are classified as held-to-maturity investments, as set forth in Law No. 8703 of December 23, 2008, which reads as follows: "These securities shall be delivered directly to State-owned banks and held to maturity and, therefore, they are not available for sale. Accordingly, these securities shall not be subject to market price valuation." Consequently, the classification applied to these securities is justified by the fact that it is prescribed by law. These securities are recognized at amortized cost and are zero-coupon securities.

The effect of valuating trading investments at market price is booked directly in profit or loss.

All non-trading financial assets and liabilities, originated loans and other receivables, and held-to-maturity investments are measured at amortized cost, including transaction costs, less impairment losses. Any premium or discount is included in the carrying amount of the underlying instrument and amortized to finance income or expense using the effective interest method.

# iv. Fair value measurement principles

The fair value of financial instruments is based on their quoted market price at the consolidated balance sheet date without any deduction for transaction costs.

#### Notes to Consolidated Financial Statements

# v. Gains and losses on subsequent measurement

Gains and losses arising from changes in the fair value of available-for-sale assets are recognized directly in equity until an investment is considered to be impaired, at which time the loss is recognized in the income statement. When the financial assets are sold, collected, or otherwise disposed of, the cumulative gain or loss recognized in equity is transferred to the income statement.

# vi. Derecognition

A financial asset is derecognized when the Bank loses control over the contractual rights that comprise the asset. This occurs when the rights are realized, expire, or are surrendered to a third party.

Available-for-sale investments that are sold are derecognized and the corresponding account due from the purchaser is recognized on the date the Bank sells the assets.

A financial liability is derecognized when the specific contractual obligation has been paid or settled, or when the obligation has expired.

#### vii. Offsetting

Financial assets and liabilities are offset and the net amount presented in the consolidated financial statements when the Bank has a legal right to set off the recognized amounts and intends to settle on a net basis.

# viii. Impairment of financial assets

The carrying amount of an asset is reviewed at each balance sheet date to determine whether there is any indication of impairment. If any such indication exists, then the asset's recoverable amount is estimated. An impairment loss is recognized whenever the carrying amount of an asset exceeds its recoverable amount. Impairment losses are recognized in the income statement for assets carried at cost and treated as a decrease in unrealized gains for assets carried at fair value.

#### Notes to Consolidated Financial Statements

The recoverable amount of an asset is equivalent to the greater of its net selling price and its value in use. The net selling price is equivalent to the value obtained in an arm's length transaction. Value in use is the present value of future cash flows and disbursements expected to arise from the continuing use of an asset and from its disposal at the end of its useful life.

If, in a subsequent period, the amount of the impairment loss decreases and the decrease can be linked objectively to an event occurring after the write-down, the write-down is reversed through the income statement or equity, as appropriate.

# ix. Specific instruments

# Cash and cash equivalents

Cash and cash equivalents include cash on hand, cash deposited in BCCR, deposits in other banks, and highly-liquid short-term investments with original maturities of two months or less.

# <u>Demand deposits – overnight</u>

Demand deposits that are classified as overnight deposits at the end of the business day are included in the "Cash and due from banks" account under the caption "Foreign financial entities."

# <u>Investments in financial</u> instruments

Investments in financial instruments are classified as available for sale and were valued using the price vector furnished by PIPCA until July 31, 2013; starting August 1, 2013, the price vector provided by VALMER Costa Rica, S.A. is applied. In accordance with accounting standards issued by CONASSIF, starting January 1, 2008, the Bank no longer classifies financial instruments as held-to-maturity investments. However, pursuant to Law No. 8703 "Amendment to Law No. 8627 on the Ordinary and Extraordinary Budget of the Republic for Tax Year 2008", securities received to capitalize State-owned banks are to be classified as held to maturity and are not subject to market price valuation.

Investments that the Bank holds for the purpose of short-term profit-taking are classified as trading instruments. Other investments are classified as available-for-sale assets.

# Notes to Consolidated Financial Statements

The effect of market price valuation of available-for-sale investments is included in the equity account under the caption "Adjustment for valuation of availablefor-sale investments" until those investments are realized or sold.

Regular purchases or sales of financial assets are recognized using settlement date accounting, i.e. are booked on the date the entity's financial asset was exchanged.

Investments in repurchase agreements (term seller positions) and securities with original maturities of less than 180 days are not valued at market prices and are stated at the value of the original agreement.

When a financial asset is acquired with accrued interest, such interest is booked in a separate account as accrued interest receivable.

An allowance is established for the entire value of securities that may not be traded in an active financial or stock market due to the legal form of the issuer and the transfer method of the security and for which interest payable is past due.

# Loans and advances to banks and customers

Loans originated by the Bank are classified as loan portfolio.

Loans and advances are presented net of allowances to reflect the estimated recoverable amounts.

# Securities sold under repurchase agreements

The Bank sells securities under agreements to repurchase them on a certain date in the future at a fixed price. The obligation to repurchase securities sold is reflected as a liability in the balance sheet and stated at the value of the original agreement. The underlying securities are booked in asset accounts. Interest is presented as finance expense in the income statement and accrued interest payable is recognized in the balance sheet.

# Securities purchased under reverse repurchase agreements

The Bank purchases securities under agreements to sell them on a certain date in the future at a fixed price. The obligation to sell securities purchased is reflected as an asset in the balance sheet and stated at the value of the original agreement. The underlying securities are booked in asset accounts. Interest earned is presented as finance income in the income statement and accrued interest receivable is recognized in the balance sheet.

#### Notes to Consolidated Financial Statements

# (f) <u>Loan portfolio</u>

- SUGEF defines a credit operation as any operation related to any type of underlying instrument or document, except investments in financial instruments, whereby credit risk is assumed either by providing or committing to provide funds or credit facilities, acquiring collection rights, or guaranteeing that obligations with third parties will be honored. Credit operations include loans, guarantees, letters of credit, pre-approved lines of credit, and loans pending disbursement.
- The loan portfolio is presented at the amount of outstanding principal. Interest is calculated based on the value of outstanding principal and the contractual interest rates, and is accounted for as income using the accrual method of accounting. The Bank follows the policy of suspending interest accruals on loans when principal or interest payments are more than 180 days past due. The recovery or collection of that interest is recognized as income when collected.

# (g) Allowance for loan impairment

- The allowance for loan impairment is based on a periodic assessment of the collectibility of the loan portfolio that considers a number of factors, including current economic conditions, prior experience with the allowance, the portfolio structure, borrower liquidity, and loan guarantees.
- Additionally, the collectibility of the loan portfolio is assessed in conformity with the provisions of SUGEF Directive 1-05, "Regulations for Borrower Classification", which was approved by CONASSIF on November 24, 2005, was published in Official Gazette No. 238 dated December 9, 2005, and is effective as of October 9, 2006. That assessment considers parameters including borrower payment history, creditworthiness, the quality of guarantees, delinquency, etc.
- SUGEF may require an allowance to be established for an amount greater than the amount determined by the Bank.
- Management considers the allowance to be sufficient to absorb any potential losses that may be incurred on recovery of the portfolio.
- As of March 31, 2015 and 2014, increases in the allowance for loan impairment are included in the accounting records in accordance with article 10 of IRNBS.

#### Notes to Consolidated Financial Statements

As of March 31, 2015 and 2014, the allowance for stand-by credit losses is presented in the liability section of the balance sheet, in the "Other liabilities" account, and amounts to &epsilon1,447,588,321 and &epsilon884,608,211, respectively (see note 18).

# (h) Allowance for impairment of derivative instruments other than hedges

The provisions of article 35 of SUGEF Directive 9-08 are to be applied in calculating the allowance for clearing price risk in respect of each customer or counterparty. For such purposes, the capital requirement adjusted for clearing price risk (as defined in article 28 of SUGEF Directive 3-06) must be multiplied by the respective allowance percentage corresponding to the borrower rating included in SUGEF Directive 1-05.

# (i) Other receivables

The recoverability of these accounts is assessed by applying criteria similar to those established by SUGEF Directive 1-05 for the loan portfolio. Notwithstanding the results of the assessment, if an account is not recovered within 120 days from the due date, an allowance is established for an amount equivalent to 100% of the balance receivable. Accounts with no specified due date are considered payable immediately.

# (j) Property and equipment

#### i. Own assets

Property and equipment is stated at cost, net of accumulated depreciation. Significant improvements are capitalized, while minor repairs and maintenance that do not extend the useful life or improve the asset are directly expensed when incurred.

Pursuant to requirements established by regulatory authorities, the Bank must have its real property appraised by an independent appraiser at least once every five years, in order to determine its net realizable value. If the realizable value is less than the carrying amount, the carrying amount must be adjusted to the appraisal value.

As of March 31, 2015, no appraisals were made of the Bank's land and buildings by independent appraisers. The net effect derived therefrom in the amount of nil was recognized in the "Surplus from revaluation of property and equipment" account.

# Notes to Consolidated Financial Statements

#### ii. Leased assets

Leases in terms of which the Bank assumes substantially all the risks and rewards of ownership are classified as finance leases.

Property and equipment acquired under finance leases is measured at the lower of its fair value and the present value of minimum payments at the date of inception of the lease, less accumulated depreciation and amortization and impairment losses.

# iii. Subsequent expenditure

Expenditure incurred to replace a component of an item of property and equipment that is accounted for separately, including major inspection and renovation costs, is capitalized. Other subsequent expenditure is capitalized only when it increases the future economic benefits embodied in the item of property and equipment. All other expenditure is recognized in the income statement as an expense when incurred.

# iv. Depreciation and amortization

Depreciation and amortization are charged to the income statement on a straightline basis over the estimated useful lives of the assets, as follows:

Type of asset	Estimated useful life
Buildings	Based on appraisals
Vehicles	10 years
Furniture and equipment	10 years
Computer hardware	5 years
Portable computers	3 years
Laggabold improvements	To be determined or establis

Leasehold improvements To be determined or established in lease terms

# (k) Intangible assets

# i. Other intangible assets

Other intangible assets acquired by the Bank are stated at cost less accumulated amortization and impairment losses.

# Notes to Consolidated Financial Statements

# ii. Subsequent expenditure

Subsequent expenditure is capitalized only when it increases the future economic benefits. All other expenditure is recognized in the income statement when incurred.

#### iii. Amortization

Amortization is charged to profit or loss on a straight-line basis over the estimated useful lives of the assets. Computer software and software licenses have an estimated useful life of 3 years and 1 year, respectively.

# (l) <u>Lease operations</u>

Lease receivables are presented net of unearned interest pending collection. Interest on finance leases is recognized as income over the term of the finance lease agreement using the effective interest method. The difference between lease payments receivable and the cost of the leased asset is recorded as unearned interest and amortized to income accounts over the term of the lease. As of March 31, 2015 and 2014, the Bank has no finance leases.

The Bank's operating leases are mainly for vehicles and equipment and have terms of between 12 and 48 months.

# (m) Foreclosed assets

Foreclosed assets are assets owned by the Bank for realization or sale, i.e. assets acquired in lieu of payment, assets awarded in judicial auctions, assets purchased to be leased under finance and operating leases, goods produced for sale, idle property and equipment, and other foreclosed assets.

Foreclosed assets are valued at the lower of cost and fair value. If fair value is less than the cost booked in the accounting records, an impairment allowance must be booked for the amount of the difference between both values. Cost is the historical acquisition or production value in local currency. These assets should not be revalued or depreciated for accounting purposes and they are to be booked in local currency. The cost booked in the accounting records for a foreclosed asset may only be increased by the amount of improvements or additions, up to the amount by which they increase the asset's realizable value. Other expenditures related to foreclosed assets are to be expensed in the period incurred.

#### Notes to Consolidated Financial Statements

The net realizable value of an asset should be used as its fair value. Net realizable value is determined by applying strictly conservative criteria and is calculated by subtracting expenses to be incurred on the sale of the asset from its estimated selling price. The estimated selling price of the asset is determined by an appraiser based on current market conditions. Future expectations for market improvements are not considered and it is assumed that the assets must be sold in the shortest period of time possible to enable the Bank to recover the money invested and use it for its business activities. For all foreclosed assets, reports should be prepared by the appraisers who made the appraisals and those reports are to be updated at least annually.

If an asset booked in this group is used by the Bank, it should be reclassified to the appropriate account in the corresponding group.

SUGEF Directive 34-02 requires that the allowance for impairment of foreclosed assets acquired or produced after May 2010 be established gradually by booking one-twenty-fourth of the value of such assets each month during two years until the allowance is equivalent to 100% of the assets' carrying amount.

For foreclosed assets prior to the aforementioned date, management of the Bank follows the policy of recognizing an allowance equivalent to 100% of the asset's realizable value for assets that are not sold or leased, within two years from the date of acquisition or production.

# (n) <u>Investments in other companies</u>

Investments in the share capital of entities over which the Bank exercises control or significant influence are accounted using the equity method in the Bank's unconsolidated financial statements but are eliminated on consolidation. The following entities are wholly owned by the Bank and are measured by the equity method: BN Valores Puesto de Bolsa, S.A.; BN Vital Operadora de Planes de Pensiones Complementarias, S.A.; BN Sociedad Administradora de Fondos de Inversión, S.A.; and BN Corredora de Seguros, S.A. The Bank's 49% ownership interest in BICSA is also measured by the equity method. Under the equity method, investments are initially recognized at acquisition cost. Subsequently, the carrying amounts of the investments are increased or decreased in order to recognize the Bank's proportional share in the profits or losses of the issuer of the capital assets.

The operations of subsidiaries that affect the Bank's equity but have no effect on the results of its operations are also included in the Bank's accounting records.

#### Notes to Consolidated Financial Statements

As of March 31, 2015 and 2014, the Bank has no total or partial interest or influence over the management of other companies other than its subsidiaries and associate, in accordance with article 73 of IRNBS and article 146 of the Internal Regulations of the Central Bank of Costa Rica.

# (o) Impairment of non-financial assets

The carrying amount of an asset is reviewed at each balance sheet date to determine whether there is any indication of impairment. If any such indication exists, then the asset's recoverable amount is estimated. An impairment loss is recognized whenever the carrying amount of an asset exceeds its recoverable amount. Impairment losses are recognized in the income statement for assets carried at cost and treated as a revaluation decrease for assets carried at revalued amounts.

The recoverable amount of an asset is equivalent to the greater of its net selling price and its value in use. The net selling price is equivalent to the value obtained in an arm's length transaction. Value in use is the present value of future cash flows and disbursements expected to arise from the continuing use of an asset and from its disposal at the end of its useful life.

If, in a subsequent period, the amount of the impairment loss decreases and the decrease can be linked objectively to an event occurring after the write-down, the write-down is reversed through the income statement or equity, as appropriate.

# (p) <u>Provisions</u>

A provision is recognized in the balance sheet if, as a result of a past event, the Bank has a present legal or constructive obligation and it is probable that an outflow of economic benefits will be required to settle the obligation. The provision made approximates settlement value; however, final amounts may vary. The estimated value of provisions is adjusted at the balance sheet date, directly affecting the income statement.

The provision for legal risks is calculated using a mathematical-statistical model developed by the Bank's Corporate Risk Division based on data provided by the File Master system, which is used by the Bank's Legal Department to manage legal actions as of a given date. This system is comprised of modules that provide data to construct statistical series and analyze the status of settled and in-process legal actions.

#### Notes to Consolidated Financial Statements

This system includes the legal proceedings initiated against the Bank in connection with the Employee Protection and Retirement Fund and the Trust 897 arbitration case.

Administrative claims filed for phishing (a form of Internet fraud) are also included.

The data obtained from the modules are reviewed on a monthly basis by the Bank's Operational Risk Division in order to update the likelihood of favorable rulings and the percentages to be provisioned and to adjust the provision amount projected by the model and the amounts booked each month until the proposed limit has been reached.

# (q) Severance benefits

Costa Rican legislation requires the payment of severance benefits to employees in the event of retirement, invalidity, death, or dismissal without just cause, equivalent to 20 days' salary for each year of continuous service, up to a maximum of 8 years. In the specific case of the Bank, that limit is 17 years for employees with more than 25 years of service. The Bank follows the policy of booking a provision to cover future disbursements related therewith for employees with more than 20 years of service, in compliance with article 34 of the Collective Bargaining Agreement. As of March 31, 2015, a total of ¢14,281,612,685 (2014: ¢22,262,134,062) is booked in the "Provisions" account for severance benefits. That amount is sufficient to cover the provisions required by current legislation as of those dates (see note 16). The Employee Association of Banco Nacional de Costa Rica (ASEBANACIO) was created in 2012. Accordingly, the Bank currently follows the practice of making monthly transfers of severance benefits to the Employee Association, equivalent to 5.33% of member employees' monthly salaries, for management and custody. Those funds are paid out to employees upon termination of employment. Severance payments are expensed when the funds are transferred.

In February 2000, the Employee Protection Law was enacted and published. Such law modifies the existing severance benefit system and establishes a compulsory supplemental pension system, thereby amending several provisions of the Labor Code.

Pursuant to the Employee Protection Law, all public and private employers must contribute 3% of monthly employee salaries during the entire term of employment. Contributions are collected through the Costa Rican Social Security Administration (CCSS) and are then transferred to pension fund operators selected by employees.

#### Notes to Consolidated Financial Statements

# (r) Employee benefits

Employee Protection and Retirement Fund

The Employee Protection and Retirement Fund of Banco Nacional de Costa Rica (the Fund) was created by Law No. 16 (Law of Banco Nacional de Costa Rica) of November 5, 1936 and has been amended on a number of occasions. The most recent amendment was included in Law No. 7107 (Law to Modernize the Financial System of the Republic) of October 26, 1988. Pursuant to Law No. 16, the Fund was established as a special employee protection and retirement system for the Bank's employees. The Fund is comprised of the following:

- items established by the laws and regulations related to the Fund
- contributions made by the Bank equivalent to 10% of total wages
- contributions made by employees equivalent to 5% of total wages to strengthen the Fund
- income from investments made by the Fund and other potential income.

For members of the Fund who terminate their employment prior to being entitled to a pension, the member's accrued balance is paid in accordance with the conditions stipulated in the Fund's Regulations on Retirement.

The governing body is responsible for the Fund's internal management. The Fund's accounting records are kept by Bank employees selected based on their qualifications, in accordance with the provisions of the governing body and with the oversight of the Internal Audit Department. Those employees are independent from the Bank's general accounting department and the Fund's accounting records are kept separately. The Fund operates based on the principle of solidarity.

The Bank's contributions to the Fund are considered to be defined contribution plans. Consequently, the Bank has no additional obligations.

#### Notes to Consolidated Financial Statements

*Vacation, back-to-school bonus, and incentive plans* 

The Bank and its subsidiaries book accruals for vacation, back-to-school bonus, and incentive plans. Incentives to employees are calculated using the Incentives and Performance Assessment System (SEDI).

SEDI is an economic incentive that is granted provided that the following two conditions are met:

- The Bank reports profits in its audited financial statements for the corresponding period; and
- The employee eligible for the SEDI incentive has worked for at least 6 months for the Bank during the period and has obtained the required minimum score in the assessed areas.

The incentive aims to promote effective achievement of institutional objectives and goals, which requires continuous efforts by the Bank to coordinate and consolidate its work force, increase its productivity, and ensure its compensation is market-competitive.

The method applied considers the above conditions and income after income tax and statutory allocations. The incentive to be granted to each employee is determined based on salaries earned during the year and the score obtained by the employee. Incentives are paid to employees in a lump sum. Expenses are taken against a provision account on a monthly basis and, in the following year that account is cleared upon payment of incentives to employees that met the aforementioned conditions.

# (s) Accounts payable and other liabilities

Accounts payable and other liabilities are carried at cost.

#### (t) Deferred income

Deferred income corresponds to income received in advance by the Bank and its subsidiaries that should not be recognized in profit or loss since it has not yet been accrued. Deferred income is recognized and credited to the corresponding income account as it accrues.

#### Notes to Consolidated Financial Statements

### (u) Equity reserves

# Legal reserve

Pursuant to article 12 of IRNBS, the Bank appropriates 50% of each year's earnings after income taxes and statutory allocations to a legal reserve. Such appropriation is performed pursuant to the Chart of Accounts for Financial Entities, Groups, and Conglomerates. Accordingly, in the first and second halves of each year, income and expenses are offset and the sum of the results of each half year is transferred to opening retained earnings.

As of March 31, 2015, the legal reserve amounts to ¢248,809,086,655 (2014: ¢209,058,123,505).

# (v) <u>Revaluation surplus</u>

Revaluation surplus included in equity may be transferred directly to retained earnings when the surplus is realized. Total surplus is realized on the retirement, disposal, or use of the asset. The transfer of revaluation surplus to retained earnings is not made through the income statement. The Bank follows the policy of capitalizing revaluation surplus directly to share capital as authorized by SUGEF.

In prior periods, the Bank has capitalized surplus from revaluation of property and equipment, in compliance with SUGEF regulations.

# (w) Income tax

Income tax is determined pursuant to the provisions of the Income Tax Law, which require that the Bank file its income tax returns for the 12 months ending March 31 of each year. Any resulting tax is recognized in profit or loss and credited to a liability account in the balance sheet.

#### *i.* Current tax:

Current tax is the expected tax payable on taxable income for the year, using tax rates enacted at the balance sheet date, and any adjustment to tax payable in respect of previous years.

#### Notes to Consolidated Financial Statements

The Bank applies the AD-HOC methodology to calculate the percentage of nondeductible expenses by applying a proportional factor of annual average obligations with the public applied to the investment portfolio. The proportional factor of obligations is calculated by deducting from total obligations with the public (group of accounts 210, 230 and 260), the amount allocated to cash and due from banks (group of accounts 110) and the loan portfolio (group of accounts 130), divided by total obligations with the public. All data correspond to annual averages based on month-end balances.

The resulting proportional factor is applied to total finance expense for the year, net of the revaluation effect.

As of March 31, 2015, the Bank booked a current income tax liability in the net amount of  $$\phi 3,058,514,241$ (2014: $\phi 797,580,345)$ , which was calculated using the AD-HOC methodology (see notes 15 and 17).

For the subsidiaries BN Vital Operadora de Planes de Pensiones Complementarias, S.A.; BN Sociedad Administradora de Fondos de Inversión, S.A.; BN Valores Puesto de Bolsa, S.A., and BN Corredora de Seguros, S.A., income tax is calculated by applying the applicable tax rate to net income after deducting nontaxable income and adding nondeductible expenses.

# ii. Deferred tax:

Deferred tax is provided using the balance sheet liability method, providing for temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes. In accordance with this method, temporary differences are identified as either taxable temporary differences (which result in future taxable amounts) or deductible temporary differences (which result in future deductible amounts). A deferred tax liability represents a taxable temporary difference and a deferred tax asset represents a deductible temporary difference.

A deferred tax asset is recognized only to the extent that there is a reasonable probability that it will be realized.

# Notes to Consolidated Financial Statements

# (x) Segment reporting

A business segment is a distinguishable component of the Bank that is engaged either in providing a specific product or service, or a group of related products or services within a particular economic environment, which is subject to risks and returns that are different from those of other business segments.

# (y) Combination of financial statements of departments

The financial statements of the Commercial Banking, Mortgage Banking, and Rural Credit Banking departments were combined to determine the financial and economic position of the legal entity (the Bank), since those departments are dedicated to banking activities and are directly subordinate to the Bank's General Board of Directors, which is responsible for making decisions related to those departments.

All inter-department assets, liabilities, income, and expenses have been eliminated in the process of combining the financial statements.

Pursuant to the provisions of IRNBS, the accounting records of each of the Bank's departments are kept separately.

# (z) <u>Use of estimates</u>

Management has made a number of estimates and assumptions relating to the reporting of assets, liabilities, profit or loss, and the disclosure of contingent liabilities in preparing these consolidated financial statements. Actual results may differ from those estimates. Material estimates that are particularly susceptible to significant changes are related to the calculation of the allowance for loan impairment.

# (aa) Recognition of income and expenses

# i. Finance income and expense

Finance income and expense are recognized in the income statement as they accrue. Finance income and expense include amortization of any premium or discount during the term of the instrument until maturity.

The Bank follows the policy of suspending interest accruals on loans when principal or interest payments are more than 180 days past due. Finance income on those loans is recognized when collected.

#### Notes to Consolidated Financial Statements

DU are valued using the rates provided by SUGEVAL for such purposes. The effect of valuation of assets and liabilities denominated in DU is directly booked in the corresponding foreign exchange gain and foreign exchange loss accounts in the income statement.

#### ii. Fee and commission income

Fees and commissions on the loan portfolio are recognized directly in profit or loss provided they are related to costs incurred in loan portfolio activities, as stipulated in the current Chart of Accounts.

Fee and commission income arises on services provided by the Bank. Fee and commission income is recognized when the service is provided, i.e. on an accrual basis. When fees and commissions are deferred, they are recognized over the term of the service.

# iii. Income from foreign currency exchange and arbitrage

Income from foreign currency exchange and arbitrage corresponds to foreign exchange gains arising from the purchase and sale of foreign currency. Cumulative foreign exchange gains arising from purchases and sales of foreign currency conducted during the month are recognized in the income statement on a monthly basis.

# iv. Operating lease expenses

Payments for operating lease agreements are recognized in the income statement over the life of the lease.

# (bb) Statutory allocations

Under article 12 of IRNBS, the net earnings of commercial State-owned banks are allocated as follows: 50% to a legal reserve; 10% to increase the capital of the National Institute for Cooperative Development (INFOCOOP); and the remainder to increase the Bank's capital, pursuant to article 20 of Law No. 6074. In conformity with SUGEF's Chart of Accounts, statutory allocations on the year's net earnings payable to INFOCOOP, the National Emergency Commission (CNE), and the National Commission for Educational Loans (CONAPE) are presented as expenses in the income statement. Pursuant to paragraph a) of article 20 of Law No. 6041 "Law to Create the National Commission for Educational Loans (CONAPE)", the Bank is required to make statutory allocations equivalent to 5% of earnings before taxes and statutory allocations to CONAPE.

### Notes to Consolidated Financial Statements

In accordance with article 46 of the "National Emergency and Risk Prevention Act", all institutions of the central administration and decentralized public administration, as well as State-owned entities, must contribute three percent (3%) of their reported earnings before taxes and statutory allocations and of their accumulated budget surplus to CNE. Such funds are deposited in the National Emergency Fund to finance the National Risk Management System.

Article 78 of Law No. 7983 "Employee Protection Law" establishes a contribution of up to 15% of the earnings of State-owned public companies, with the purpose of strengthening the funding base for the Disability, Old Age, and Death Benefit System (RIVM) of CCSS and to provide universal CCSS coverage for impoverished non-salaried workers. Accordingly, through Executive Order No. 37127-MTSS, published in Official Gazette No. 103 dated May 29, 2012, this contribution is established gradually as follows:

- 5% starting 2013
- 7% starting 2015
- 15% starting 2017.

## (cc) Development Financing Fund (FOFIDE)

In accordance with article 32 of the Development Banking System Act No. 8634, all State-owned banks, except Banco Hipotecario para la Vivienda (BANHVI), shall appropriate each year at least five percent (5%) of their net earnings after income taxes to create and strengthen their own development funds. The objective of that appropriation is to provide financing to individuals and legal entities that present viable and feasible projects in conformity with the provisions of the aforementioned law.

For purposes of establishing and strengthening development financing funds, all Stateowned banks shall transfer to their respective funds the amount corresponding to prior year earnings in the second quarter of each year. At that time, the development financing programs that have been approved by the Governing Board will start operations.

### Notes to Consolidated Financial Statements

## (dd) Development Credit Fund (FCD)

The Development Credit Fund (FCD) is comprised of the funds prescribed in article 59 of IRNBS. The FCD will be managed by State-owned banks. Accordingly, in compliance with Law No. 9094 "Repeal of Transition Provision VII of Law No. 8634", in agreement with article 35 of Law No. 8634 "Development Banking System Act", in meeting No. 119 of January 16, 2013, through agreement No. AG-1015-119-2013, Banco de Costa Rica and Banco Nacional de Costa Rica are appointed as managers for five years from the date of signing of the respective management agreements. Each bank is awarded the management of fifty percent (50%) of such fund.

Accordingly, through Official Letter CR/SBD-014-2013, the Technical Secretariat of the Governing Board required all private banks to open checking accounts with both Banco Nacional de Costa Rica and Banco de Costa Rica (Managing Banks) in local and foreign currency and allocate fifty percent (50%) of those funds to each Managing Bank.

The powers granted by the Governing Board to the Managing Banks are as follows:

- a. Under article 6 of Law No. 8634, the Managing Banks may offer first-tier banking services to the beneficiaries of the Development Banking System.
- b. Under article 35 of Law No. 8634, the Managing Banks may offer second-tier banking services with FCD funds for financial entities other than private banks, provided that the purposes and obligations established in Law No. 8634 are met and such entities are duly authorized by the Governing Board.
- c. Under article 35 of Law No. 8634, the Managing Banks may channel FCD funds through placements to: associations, cooperatives, foundations, non-governmental organizations, producer organizations, or other formal entities, provided that they perform loan operations through development financing programs that meet the objectives established in Law No. 8634 and are duly authorized by the Governing Board.
- d. The term of the agreement is five years, renewable for equal and successive periods, unless a written order by the Governing Board provides otherwise and is notified at least three months in advance. If a lack of capacity and competence is proven by the Managing Banks, this agreement may be terminated under paragraph j), article 12 of Law No. 8634 and the executive regulations thereto.

# Notes to Consolidated Financial Statements

# (2) <u>Collateralized or restricted assets</u>

Collateralized or restricted assets are as follows:

			Carrying	amount	
Restricted asset	_	March 2015	December 2014	March 2014	Cause of restriction
Cash and due from banks	¢	548,249,242,275	548,764,416,720	539,571,198,046	Minimum cash reserve
Cash and due from banks	¢	255,139,367	239,089,673	466,387,352	Liquidation and compensation risk management fund
Investments in financial instruments	¢	50,743,526,689	38,566,722,512	42,948,109,392	Guarantee for repurchase agreements (tri-party)
Investments in financial instruments	¢	7,921,016,147	7,994,461,315	8,064,527,562	Guarantee for margin calls - term operations
Investments in financial instruments	¢	286,390,638,181	288,928,706,371	296,041,341,662	Guarantee for obligations with foreign financial entities
Investments in financial instruments Investments in financial	¢	335,713,300	335,132,100	334,896,900	Investments securing repurchase agreements Interbank Electronic Payment
instruments	¢	-	-	32,171,573,770	System (SINPE) guarantee
Other assets (note 11)	¢	390,438,633	334,553,479	246,037,196	Guarantee deposits

## Notes to Consolidated Financial Statements

As of March 31, 2015 and 2014, the applicable percentage for the minimum cash reserve is 15%. The corresponding amount must be deposited in cash in BCCR pursuant to current banking legislation. The reserve is calculated as a percentage of third-party deposits, which varies based on the term and form of deposit-taking used by the Bank. As of March 31, 2015, the Bank must maintain a minimum cash reserve of ¢548,249,242,275 (December 2014: ¢548,764,416,720 and March 2014: ¢539,571,198,046).

## Collateralized or restricted assets are as follows:

		_	March 2015	December 2014	March 2014
Restricted asset	Cause of restriction	_	Carrying amount	Carrying amount	Carrying amount
Checking account – colones	Minimum cash reserve	¢	373,481,461,160	374,788,268,448	3,553,263,862,704
Checking account – euros	Minimum cash reserve	€	8,192,866	7,962,840	8,143,212
Checking account – U.S. dollars	Minimum cash reserve Liquidation and compensation risk	US\$	322,612,005	316,529,644	334,839,808
Checking account – colones	management fund	¢	255,139,367	239,089,673	466,387,352
vestments in financial instruments	Guarantee for repurchase agreements (tri-party)	¢	50,743,526,689	38,566,722,512	42,948,109,392
Securities issued by BCCR and the Government	Investments securing repurchase agreements Guarantee for margin calls - term operations – Bank of	¢	335,713,300	335,132,100	334,896,900
External debt bonds	America	¢	3,693,645,645	3,732,194,049	3,768,068,323
External debt bonds	Guarantee for margin calls - term operations – Citi Swap Guarantee for margin calls - term operations – JP	¢	2,114,713,601	2,130,530,785	2,146,544,617
External debt bonds	Morgan Swap	¢	2,112,656,901	2,131,736,481	2,149,914,622
Monetary stabilization bonds Central Bank bond (global	Citibank guarantee Citibank guarantee	¢	15,192,981,501	15,009,933,300	33,876,780,000
bonds)	<u> </u>	¢	126,281,341,561	127,659,542,800	-
External debt bonds	Barclays guarantee	¢	75,566,136,608	75,765,386,092	110,489,770,708
Central Bank bond (global bonds)	Barclays guarantee	¢	-	-	76,803,875,728
External debt bonds	Credit Suisse guarantee	¢	69,350,178,511	70,493,844,179	74,870,915,226
Monetary stabilization bonds	Interbank Electronic Payment System (SINPE) guarantee	¢	-	-	1,382,796,370
Securities issued by BCCR and the Government	Investments securing repurchase agreements	¢	_	_	30,788,777,400
Other assets	Guarantee deposits	¢	390,438,633	334,553,479	246,037,196
	*				

## Notes to Consolidated Financial Statements

As of March 31, 2015, the Brokerage Firm has restricted assets in the amount of ¢50,998,666,056 (December 2014: ¢38,805,812,185 and March 2014: ¢43,414,496,743), corresponding to guarantees for tri-party repurchase agreements and contributions to the liquidation and compensation risk management fund.

# (3) Balances and transactions with related parties

Balances and transactions with related parties are as follows:

	_	March 2015	December 2014	March 2014
Assets:				
Checking accounts and				
demand deposits	¢	7,012,199,335	7,799,157,076	2,831,932,951
Investments in financial instruments and accrued				
interest receivable		-	-	26,917,000,000
Accounts receivable (note 7)		-	1,444,411	-
Allowance for impairment of transactions with				
related parties		(25,343,408)	(24,735,310)	-
Investments in other		· · · · · ·	, , , ,	
companies (note 9)		50,522,077,695	49,805,156,511	-
•	¢	57,508,933,622	57,581,022,688	29,748,932,951
Liabilities:				
Demand deposits	¢	362,983,231	463,489,825	236,374,973
	¢	362,983,231	463,489,825	236,374,973
Income:	=	-		
Finance		-	617,486,403	253,290,859
Gain on investments in other				
foreign companies		1,150,983,586	5,225,407,598	-
	¢	1,150,983,586	5,842,894,001	253,290,859
Expenses:				
Operating		4,190,343	<u> </u>	
		4,190,343	-	-
	_			

## Compensation paid to key personnel is as follows:

		March 2015	December 2014	March 2014
Short-term benefits	¢	456,595,778	2,012,799,746	402,620,713
Long-term benefits		59,357,452	261,663,966	-
Other compensation		-	-	62,322,371
Per Diem for Board of Directors		34,963,908	138,528,618	-
	¢	550,917,138	2,412,992,330	2,545,915,557

## Notes to Consolidated Financial Statements

# (4) <u>Cash and due from banks</u>

Cash and due from banks is as follows for purposes of reconciliation with the consolidated statement of cash flows:

	_	March 2015	December 2014	March 2014
Cash and due from banks	¢	741,390,164,875	829,976,580,984	944,526,780,031
Investments with maturities of				
less than two months	_	70,085,870,805	175,030,428,177	22,663,090,575
	¢	811,476,035,680	1,005,007,009,161	967,189,870,606

## Cash and due from banks is as follows:

		March 2015	December 2014	March 2014
Local currency:				
Cash	¢	39,068,022,133	39,070,745,022	35,175,931,265
Cash in transit		11,017,889,000	15,112,028,982	2,808,051,000
BCCR		400,701,169,444	393,336,216,822	390,124,254,709
Checking accounts and demand				
deposits		11,865,406,400	14,735,796,667	5,898,197,542
Outstanding checks and other		6,256,943,523	4,080,795,013	10,683,383,717
Margin calls - tri-party repurchase				
agreements		1,934,016	-	-
Foreign currency:				
Cash		18,344,066,838	13,413,193,044	11,986,224,312
Cash in transit		1,203,212,768	1,600,659,345	531,055,262
BCCR		204,576,091,558	182,974,796,088	191,826,481,944
Checking accounts and demand				
deposits		15,648,311	422,382	3,636,384
Foreign correspondent banks		34,392,936,111	151,045,102,800	180,000,565,206
Other demand deposits in foreign				
financial entities		62,255,848	53,607,475	148,781,251
Checking accounts and demand				
deposits in related parties		7,012,199,335	7,799,157,076	2,831,932,951
Overnight deposits in foreign				
financial entities		3,556,216,822	4,983,252,613	107,290,571,861
Outstanding checks and other		3,062,967,418	1,531,717,982	4,751,147,133
Margin calls – tri-party repurchase				
agreements		-	-	34,107,800
Guarantee fund of National Stock				
Exchange		253,205,350	239,089,673	432,279,552
Accrued interest receivable		-		178,142
	¢	741,390,164,875	829,976,580,984	944,526,780,031

## Notes to Consolidated Financial Statements

### Minimum cash reserve

Deposits in BCCR are restricted to cover minimum cash reserve requirements, as follows (see note 2):

Currency		March 2015	December 2014	March 2014
Local	¢	373,481,461,160	374,788,268,448	353,263,862,704
Foreign		174,767,781,115	173,976,148,272	186,307,335,342
	¢	548,249,242,275	548,764,416,720	539,571,198,046

The above figures correspond to the average amount for the second half of December of each year.

As of March 31, 2015, deposits in BCCR amount to ¢605,277,261,002 (December 2014: ¢576,311,012,910 and March 2014: ¢581,950,736,653).

Estimated minimum cash reserve obligations are compared with the balance of deposits in BCCR with a 30 calendar-day delay. Consequently, for each year, the average amount for the second half differs from the balance of deposits as of December 31.

## (5) <u>Investments in financial instruments and derivative financial instruments</u>

## (a) <u>Investments in financial instruments</u>

Investments in financial instruments are as follows:

		March 2015	December 2014	March 2014
Available for sale	¢	1,106,196,608,332	1,052,451,509,868	860,236,514,092
Held to maturity		27,280,583,228	27,328,967,634	26,280,955,059
Interest rate futures - Hedges				
(note 5-b)		19,321,452,126	10,619,377,926	-
FX futures - Other than				
hedges (note 5-b)		557,712,178	662,192,854	14,324,730
Accrued interest receivable		10,720,615,591	9,791,452,357	8,804,888,645
Allowance for impairment of	f			
investments		(57,176,371)	(57,821,470)	(58,438,446)
Allowance for impairment of	f			
derivative instruments	S			
other than hedges		(36,243,633)	(2,678,088)	
	¢	1,163,983,551,451	1,100,793,001,081	895,278,244,080

## Notes to Consolidated Financial Statements

Available for sale:         Local issuers:       Sovernment of Costa Rica       \$\psi\$ 497,353,290,842       415,388,939,679       348,102,12         BCCR       130,663,420,027       203,635,312,251       205,415,54	6,585 1,688 9,131 0,603
Government of Costa Rica         ¢         497,353,290,842         415,388,939,679         348,102,12           BCCR         130,663,420,027         203,635,312,251         205,415,54	6,585 1,688 9,131 0,603
BCCR 130,663,420,027 203,635,312,251 205,415,54	6,585 1,688 9,131 0,603
	1,688 9,131 0,603
	9,131 0,603
State-owned banks 57,285,783,541 95,892,324,485 2,965,76	0,603
Private banks 90,570,341,819 25,390,077,595 3,349,51	
Private issuers 45,978,968,956 4,611,733,631 13,544,57	
821.851.805.185 744.918.387.641 573.377.52	5.568
Foreign issuers:	
Governments 60,656,895,677 86,334,217,941 117,192,94	4,320
Private issuers 77,808,622,231 72,306,895,820 41,890,96	1,229
Private banks 145,879,285,239 148,892,008,466 127,775,08	1,975
284,344,803,147 307,533,122,227 286,858,98	7,524
1,106,196,608,332 1,052,451,509,868 860,236,51	4,092
Held to maturity:	
Government of Costa Rica 27,280,583,228 27,328,967,634 26,280,95	5,059
27,280,583,228 27,328,967,634 26,280,95	5,059
Interest rate futures - Hedges	
(note 5-b) 19,321,452,126 10,619,377,926 1,23	8,690
FX futures - Other than	
hedges (note 5-b) 557,712,178 662,192,854 13,08	6,040
Accrued interest receivable 10,720,615,591 9,791,452,357 8,804,88	8,645
Allowance for impairment of	
investments (57,176,371) (57,821,470) (58,366	,822)
Allowance for impairment of	
derivative instruments	
other than hedges (36,243,633) (2,678,088) (71	,624)
¢ 1,163,983,551,451 1,100,793,001,081 895,278,24	4,080

Movement in the allowance for impairment of financial instruments, both investments and derivative instruments, is as follows:

		March 2015	December 2014	March 2014
Opening balance	¢	60,499,558	53,668,984	(53,668,984)
Allowance expense (note 30)		33,565,545	4,216,707	(71,624)
Decrease in allowance				
against income (note 31)		-	(1,538,619)	-
Foreign exchange differences	_	(645,099)	4,152,486	(4,697,838)
Closing balance	¢	93.420.004	60.499.558	(58.438.446)

## Notes to Consolidated Financial Statements

- As of March 31, 2015, the allowance for impairment of investments in non-derivative financial instruments amounts to ¢57,176,371 (December 2014: ¢57,821,470 and March 2014: ¢58,366,822) and is booked for investments in Z Bonds related to the Mortgage Securitization Trust (impairment of 26%).
- As of March 31, 2015, the allowance for impairment of derivative instruments other than hedges amounts to ¢36,243,633 (December 2014: ¢2,678,088 and March 2014: ¢71,624 and is booked for FX futures other than hedges in accordance with SUGEF Directive 09-08.

Investments in financial instruments are detailed as follows:

	_	March 2015	December 2014	March 2014
Available for sale:	_			
Securities issued by BCCR	¢	109,105,531,088	117,955,741,724	165,935,761,926
Securities issued by local non-financial public sector		333,619,507,457	247,636,568,125	169,566,644,870
Securities issued by local financial entities		157,713,743,396	124,891,881,361	4,562,039,082
Securities issued by foreign financial entities		21,305,646,804	18,862,014,392	52,709,345,529
Financial instruments issued by foreign financial entities		73,822,285,599	68,275,605,974	36,440,275,123
Other securities issued abroad		36,379,540,487	33,906,883,848	11,014,154,245
Financial instruments issued abroad		-	-	26,955,895,065
Liquidity market operations – own resources		23,477,976,000	99,666,550,000	8,000,000,000
Other available-for-sale financial instruments		5,381,483,184	5,431,242,146	5,491,948,966
Financial instruments restricted for margin calls on term				
operations (note 2)		7,921,016,147	7,994,461,315	8,064,527,562
Financial instruments for tri-party repurchase agreements				
(note 2)		50,743,526,689	38,566,722,512	42,948,109,392
Financial instruments restricted for credit operations (note				
2)		286,390,638,181	288,928,706,371	296,041,341,662
Other financial instruments (note 2)		335,713,300	335,132,100	334,896,900
Financial instruments for liquidity market operations	-	-	-	32,171,573,770
	_	1,106,196,608,332	1,052,451,509,868	860,236,514,092
Held to maturity:				
Securities issued by local non-financial public sector	_	27,280,583,228	27,328,967,634	26,280,955,059
	_	27,280,583,228	27,328,967,634	26,280,955,059
Derivative financial instruments:				
Interest rate futures - Hedges (note 5-b)		19,321,452,126	10,619,377,926	1,238,690
FX futures - Other than hedges (note 5-b)	-	557,712,178	662,192,854	13,086,040
	_	19,879,164,304	11,281,570,780	14,324,730
Accrued interest receivable		10,720,615,591	9,791,452,357	8,804,888,645
Allowance for impairment of investments		(57,176,371)	(57,821,470)	(58,366,822)
Allowance for impairment of derivative instruments other				
than hedges	-	(36,243,633)	(2,678,088)	(71,624)
	¢	1,163,983,551,451	1,100,793,001,081	895,278,244,080

### Notes to Consolidated Financial Statements

Interest rates on investments in financial instruments are as follows:

Currency	March 2015	December 2014	March 2014
Colones	3.66% to 11.04%	4.25% to 11.04%	4.95% to 11.04%
U.S. dollars	0.25% to 7.63%	0.25% to 7.63%	0.25% to 6.90%
Euros	0.23% to 4.25%	0.25% to 4.25%	0.25% to 7.50%
DU	0.67% to 0.74%	0.67% to 0.74%	0.67% to 0.74%

As of March 31, 2015, valuation of available-for-sale investments and restricted financial instruments gave rise to an unrealized gain, net of deferred tax, in the amount of ¢2,334,377,864 (December 2014: unrealized gain of ¢618,175,093 and March 2014: unrealized loss of ¢1,440,545,598). Accordingly, as of March 31, 2015, the cumulative balance of equity adjustments arising from valuation of these investments is an unrealized gain of ¢1,453,050,011 (December 2014: unrealized loss of ¢3,787,427,875 and March 2014: unrealized loss of ¢5,846,148,566).

## (b) Derivative financial instruments

In Notice J.D. 5566/06/02 dated October 29, 2012, SUGEF authorized the Bank to trade derivative financial instruments (see note 47-a).

As of March 31, 2015 and 2014, the Bank holds the following types of derivative financial instruments:

## ✓ *Derivatives as risk hedging instruments:*

*Interest rate swaps:* 

In 2013, five interest rate hedges were formalized to hedge exposure to the LIBOR rate related to international debt issues made in October 2013 in U.S. dollars at a fixed rate. The purpose of these financial instruments is to compensate for the changes in fair value attributable to fluctuations in such benchmark rate.

Gains and losses on valuation of derivative financial instruments are booked under asset and liability accounts, respectively. As of March 31, 2015, the Bank booked an increase in the fair value of these hedges in the amount of US\$36,638,069, equivalent to ¢19,321,452,126 (December 2014: increase of US\$19,912,205, equivalent to ¢10,619,377,926 (see note 5-a); December and March 2014 a decrease of US\$387,629, equivalent to ¢206,726,657 and US\$3,028,164, equivalent to ¢1,630,181,711, respectively) under "Other sundry accounts payable" (see note 17).

# Notes to Consolidated Financial Statements

# Valuation of these financial instruments is as follows:

Issuing bank	<del>-</del>	Notional amount		Valuation	Purpose
Citibank	US\$	100,000,000	US\$	6,773,859	Swaps to hedge 10-year
JP Morgan		200,000,000		13,547,714	issues
Bank of America		200,000,000		13,547,714	
Subtotal	_	500,000,000		33,869,287	
Citibank		100,000,000	-	1,107,513	Swaps to hedge 5-year
JP Morgan		150,000,000	_	1,661,269	issues
Subtotal		250,000,000		2,768,782	
Total	US\$	750,000,000	US\$	36,638,069	
Amount in colones	¢	395,520,000,000	¢	19,321,452,126	
	_		mber 2		
Issuing bank	_	Notional amount	-	Valuation	Purpose
Citibank	US\$	100,000,000	US\$	3,982,441	Swaps to hedge 10-year
JP Morgan		200,000,000		7,964,882	issues
Bank of America		200,000,000		7,964,882	
Subtotal		500,000,000		19,912,205	
Citibank		100,000,000		(155,052)	Swaps to hedge 5-year
JP Morgan		150,000,000		(232,577)	issues
Subtotal		250,000,000	-	(387,629)	
Total	US\$	750,000,000	US\$	19,524,574	
Amount in colones	¢	399,982,500,000	¢	10,412,651,253	
Y ' 1 1			rch 20		<b>D</b>
Issuing bank		Notional amount	* * C A	Valuation	Purpose
Citibank	US\$	, ,	US\$	(314,108)	Swaps to hedge 10-year
JP Morgan		200,000,000		(628,216)	issues
Bank of America	_	200,000,000	-	(628,216)	
Subtotal	_	500,000,000	-	(1,570,540)	
Citibank		100,000,000		(583,049)	Swaps to hedge 5-year
JP Morgan	_	150,000,000	-	(874,574)	issues
Subtotal		250,000,000		(1,457,623)	
Total	US\$ _	750,000,000	US\$	(3,028,163)	
Amount in colones	¢	403,755,000,000	¢	(1,630,181,711)	

### Notes to Consolidated Financial Statements

- For purposes of valuating the aforementioned interest rate swaps, the Bank elected to apply the "Fair Value Hedge Method"; while the "Dollar Offset Method" is used for testing hedge effectiveness. The latter method was established by SUGEF and prescribes that effectiveness is to be assessed retrospectively. A hedge is considered highly effective if the ratio of the changes in the derivative and primary instruments ranges between 80% and 125%. As of March 31, 2015, the effectiveness of the 5- and 10-year issues is 94.62% (December 2014: 97.50% and March 2014:104.62%) and 95.88%, respectively (December 2014: 112.41% and March 2014: 106.18%).
- A valuation was performed as of March 31, 2015 and December 31 and March 31, 2014 in order to calculate the change in the fair value of the primary and derivative instruments based on the following inputs:
- ✓ A 5- or 10-year LIBOR rate at the issue of the bond;
- ✓ Discount rates from Bloomberg:
- ✓ Zero rates corresponding to the swap curve as of March 31, 2015, December 31 and March 31, 2014:
- ✓ Only a portion of the bond cash flows is hedged (corresponding to the 5- and 10year LIBOR rate in effect at the issue of the bond) rather than the total interest rate;
- ✓ Accrued and earned interest were segregated from the instruments to obtain variations in clean prices;
- ✓ Forward rate to calculate variable interest.
- As of March 31, 2015, total notional amounts of US\$750 million, equivalent to \$\psi 395,520,000,000\$ (December 2014: \$\psi 399,982,500,000\$ and March 2014: \$\psi 403,755,000,000\$), are booked under "Other debit memoranda accounts".
- ✓ Derivatives for trading purposes:

## *Currency forwards:*

In 2015, currency forwards were formalized with several clients. Under these derivative financial instruments, the Bank acts as an authorized intermediary (counterparty). These instruments serve as a trading tool that is not used for currency speculation and whereby no risks are hedged.

### Notes to Consolidated Financial Statements

- These instruments correspond to products that the Bank may offer to its customers as a result of the Central Bank's authorization granted to the Bank to act as an intermediary in the Foreign Exchange Derivatives Market.
- As of March 31, 2015, the Bank booked an increase in the fair value of these forwards in the amounts of ¢557,712,178 under an asset account (December 2014: ¢662,192,854 and March 2014: ¢14,324,730, see note 5-a) and as of December 31, 2014, a decrease in the fair value of these forwards in the amounts ¢17,779,910 under "Other sundry accounts payable" (see note 17).
- For long-term currency forwards, the Bank considers three risk factors in determining the value of a forward contract: the spot exchange rate and the interest rates in both local and foreign currency. The value of these financial instruments is determined using data related to the average exchange rate at MONEX and the market interest rates in colones and U.S. dollars applicable to different terms.
- As of March 31, 2015, total notional amounts of US\$16,800,000, equivalent to \$\psi 8,859,648,000\$ (December 2014: US\$28,640,000, equivalent to \$\psi 15,273,998,400\$ and March 2014: US\$800,000, equivalent to \$\psi 430,672,000\$) are booked under "Other debit memoranda accounts" (see note 20).

The effect on profit or loss of derivative financial instruments is as follows:

		March 2015	December 2014	March 2014
Gain on derivative financial instruments Loss on derivative financial	¢	16,076,990,355	33,852,436,868	9,494,394,612
instruments		(8,650,340,019)	(12,237,460,188)	(2,879,038,470)
Gain (loss), net	¢	7,426,650,336	21,614,976,680	6,615,356,142

## Notes to Consolidated Financial Statements

# (6) <u>Loan portfolio</u>

# (a) <u>Loan portfolio by sector</u>

The loan portfolio by sector is as follows:

		March 2015	December 2014	March 2014
Trade	¢	345,858,060,416	346,050,158,255	374,045,106,278
Services		675,481,580,566	664,830,572,542	599,597,228,625
Financial services		101,561,169,832	109,161,104,520	108,408,451,448
Mining		410,302,715	408,526,735	43,600,941
Manufacturing and quarrying		158,976,771,728	157,211,033,158	142,712,196,040
Construction		76,826,407,270	72,841,393,278	81,342,716,916
Agriculture and forestry		101,530,266,276	107,959,101,016	94,627,823,141
Livestock, hunting, and fishing		59,530,702,526	60,329,212,920	60,519,863,649
Electricity, water, sanitation, and other related sectors		276,684,672,877	269,517,208,860	225,049,936,292
Transportation and telecommunications		20,860,159,657	20,347,758,445	26,339,609,162
Housing		1,058,863,895,952	1,054,252479,390	1,006,477,104,512
Personal or consumer		342,514,704,484	347,528,047,842	316,566,733,705
Tourism		120,500,541,295	121,137,622,708	122,705,460,195
Total direct loans	_	3,339,599,235,594	3,331,574,219,669	3,158,435,830,904
Accrued interest receivable		23,254,682,069	21,715,928,888	19,823,532,560
Allowance for loan impairment		(56,000,143,462)	(49,838,574,099)	(45,738,720,624)
Total loan portfolio	¢	3,306,853,774,201	3,303,451,574,458	3,132,520,642,840

### Notes to Consolidated Financial Statements

Annual interest rates on loans receivable are as follows:

	March	n 2015	Decembe	er 2014	March 2014		
Currency	Rates	Average	Rates	Average	Rates	Average	
Colones	6.25% to 37.00%	15.35%	6.25% to 34.92%	15.20%	6.25% to 34.00%	13.76%	
U.S. dollars	3.15% to 27.96%	8.26%	3.25% to 27.96%	8.35%	3.57% to 25.92%	8.11%	
DU	3.85% to 10.00%	6.39%	3.85% to 10.00%	6.39%	3.85% to 10.00%	6.26%	

## Sold and securitized portfolio

On August 22, 2006, 1, 2014, the Bank reintroduced the strategy of selling the securitized portfolio. The sole buyer was the same buyer as of August 22, 2006, date on which the Bank established the housing mortgage securitization structure for US\$11,477,863 related to the BNCR\$2006-1 Mortgage Securitization Trust, which is managed by Banco Improsa, S.A. The securitization structure was sold at par and gave rise to no gains or losses.

The Bank was the formal and final seller of the portfolio, which was duly assigned and transferred in the Property Registry. The Bank has no further obligations in respect of the borrower payment behavior for loans sold and all of the related risks, including default, prepayment, and foreclosure of property, were assumed by the investors who purchased the bonds issued.

As of March 31, 2015, the balance of the securitized portfolio is US\$6,880,869, which is equivalent to ¢3,628,695,260 (December 2014: US\$6,892,764, equivalent to ¢3,675,980,193 and March 2014: US\$6,973,042, equivalent to ¢3,753,867,479).

## Sale of portfolio

In 2014, the Bank partially assigned certain formalized loans to entities. The portfolio was sold at par; accordingly, no gains or losses were generated.

The Bank was the formal and final seller of the portfolio and will be unilaterally responsible for the management, follow-up, and control of the servicing of the loan.

## Notes to Consolidated Financial Statements

As of March 31, 2015, the sales prices of the sold portfolio are as follows:

<u>Purchaser</u>		Sales price
Banco BICSA Panama	US\$	33,500,000
Employee Association of BNCR		19,500,000
Bancrédito (BCAC)		15,000,000
Banco Davivienda		27,000,000
Global Bank de Panamá	_	19,550,000
Total	US\$	114,550,000

# (b) <u>Loan portfolio by arrears</u>

As of March 31, the loan portfolio by arrears is as follows:

		March 2015	December 2014	March 2014
Current		_	_	
	¢	3,138,933,221,725	3,143,210,637,508	2,960,236,481,549
1 to 30 days		53,322,957,151	56,467,793,117	60,175,339,536
31 to 60 days		55,923,895,788	42,853,384,472	62,389,868,087
61 to 90 days		21,213,534,221	17,939,113,286	11,678,585,255
91 to 120 days		6,109,773,901	11,214,144,396	3,630,355,453
121 to 180 days		9,785,128,453	11,470,895,350	7,588,195,663
More than 180 days		54,310,724,355	48,418,251,540	52,737,005,361
Total direct loans		3,339,599,235,594	3,331,574,219,669	3,158,435,830,904
Accrued interest receivable		23,254,682,069	21,715,928,888	19,823,532,560
Allowance for loan				
impairment		(56,000,143,462)	(49,838,574,099)	(45,738,720,624)
Total loan portfolio	¢	3,306,853,774,201	3,303,451,574,458	3,132,520,642,840

## Notes to Consolidated Financial Statements

## (c) <u>Loan portfolio by origin</u>

The loan portfolio by origin is as follows:

		March 2015	December 2014	March 2014
Loans originated by the				
Bank	¢	3,339,535,572,104	3,331,508,652,889	3,158,331,087,344
Loans purchased by the				
Bank		63,663,490	65,566,780	104,743,560
Total direct loans		3,339,599,235,594	3,331,574,219,669	3,158,435,830,904
Accrued interest receivable		23,254,682,069	21,715,928,888	19,823,532,560
Allowance for loan				
impairment		(56,000,143,462)	(49,838,574,099)	(45,738,720,624)
Total loan portfolio	¢	3,306,853,774,201	3,303,451,574,458	3,132,520,642,840

As of March 31, 2015 and 2014, loans purchased by the Bank were purchased from BICSA.

## (d) Past due loans

Past due loans, including loans in accrual status (for which interest is recognized on a cash basis), and unearned interest on those loans, are as follows:

		March 2015	December 2014	March 2014
Past due loans in accrual status: 20,334 loans (December 2014: 17,843 and March 2014: 20,978	_			
loans)	¢	145,017,877,503	139,945,330,621	132,160,748,737
Loans in legal collections: 6,696 loans, 2.20% of portfolio (December 2014: 6,025 loans, 2.16% and March 2014: 4,165				
loans, 2.05% of portfolio)	¢	73,326,254,945	72,120,002,831	64,719,904,570
Total unearned interest in				
2015 and 2014	¢	535,461,296	424,946,962	679,064,865

## Notes to Consolidated Financial Statements

As of March 31, 2015, the Bank increased the "Finance income on non-accrual loans" account as a result of the recovery of loans receivable over 180 days past due by ¢535,461,296 (increases) (December 2014: ¢424,946,962 and March 2014: ¢679,064,865 (increases).

As of March 31, 2015, restructured loans amount to a total of ¢26,667,468,916 (December 2014: ¢26,654,096,704 and March 2014: ¢29,985,071,069).

The Bank classifies loans as past due when no principal or interest payments have been made by one day after the due date.

## (e) Accrued interest receivable on loan portfolio

Accrued interest receivable is as follows:

	_	March 2015	December 2014	March 2014
Current	¢	13,411,603,990	13,020,543,628	10,593,245,049
Past due		2,779,468,622	2,328,423,142	2,749,043,387
In legal collections		7,063,609,457	6,366,962,118	6,481,244,124
	¢	23,254,682,069	21,715,928,888	19,823,532,560

## (f) Allowance for loan impairment

The movement in the allowance for loan impairment is as follows:

	March 2015	December 2014	March 2014
Opening balance	¢ 49,838,574,099	45,646,182,874	45,646,182,874
Expense for the year (note 27)	8,036,178,640	26,164,806,164	3,873,426,365
Settlements	(1,673,239,000)	(21,708,233,163)	(4,864,603,939)
Decrease in allowance against			
income (note 28)	-	(1,200,000,000)	-
Foreign exchange differences	(201,370,277)	935,818,224	1,083,715,324
Closing balance	¢ 56,000,143,462	49,838,574,099	45,738,720,624

Management considers the allowance for loan impairment to be sufficient based on its assessment of the recoverability of the portfolio and existing guarantees.

## Notes to Consolidated Financial Statements

# (7) Other receivables

Other receivables are as follows:

		March 2015	December 2014	March 2014
Fees and commissions	¢	893,922,091	1,011,708,508	745,185,348
Stock exchange transactions		54,271,944	9,121,769	27,138,808
Transactions with related parties		-	1,444,411	-
Transactions with related parties				
(officers and employees)		56,757,442	26,144,755	323,068,301
Deferred tax (note 15-c)		1,375,374,602	1,667,869,346	2,378,572,083
Income tax		2,563,637,695	2,623,590,564	829,573,354
Other sundry accounts		4,009,053,924	3,159,168,189	2,599,265,317
Accrued interest receivable on				
other sundry accounts				
receivable		2,027,139	2,572,781	1,698,456
Allowance for impairment of				
other accounts receivable	_	(5,730,738,649)	(5,361,359,410)	(2,815,204,392)
	¢	3,224,306,188	3,140,260,913	4,089,297,275

Movement in the allowance for impairment of other accounts receivable is as follows:

		March 2015	December 2014	March 2014
Opening balance	¢	5,361,359,410	2,303,226,624	2,303,226,624
Allowance expense (note 30)		509,885,376	4,558,394,588	711,181,381
Decrease in allowance against				
income (note 31)		(36,160,680)	(1,014,031,493)	(91,659,427)
Items settled against allowance		(101,352,533)	(495,113,902)	(120,047,106)
Foreign exchange differences	_	(2,992,924)	8,883,593	12,502,920
Closing balance	¢	5,730,738,649	5,361,359,410	2,815,204,392

# (8) <u>Foreclosed assets</u>

Foreclosed assets are presented net of the allowance for impairment and per legal requirements are as follows:

		March 2015	December 2014	March 2014
Assets acquired in lieu of				
payment	¢	76,715,068,912	76,541,792,707	75,044,623,872
Idle property and equipment		1,756,777	1,756,777	1,756,777
Allowance for impairment		(57,611,857,316)	(57,188,491,454)	(56,712,451,016)
	¢	19,104,968,373	19,355,058,030	18,333,929,633

## Notes to Consolidated Financial Statements

Movement in the allowance for impairment is as follows:

	_	March 2015	December 2014	March 2014
On aning halange	d	57 100 A01 A5A	56 007 012 200	56 007 012 200
Opening balance	¢	57,188,491,454	56,007,912,290	56,007,912,290
Allowance expense (note 34)		5,928,010,022	23,421,294,389	6,197,573,644
Decrease in allowance against				
income	_	(5,504,644,160)	(22,240,715,225)	(5,493,034,918)
Closing balance	¢	57,611,857,316	57,188,491,454	56,712,451,016

## (9) <u>Investments in other companies</u>

Investments in other companies are as follows:

		March 2015	December 2014	March 2014
Other financial and non- financial companies Banco Internacional de Costa Rica, S.A. and Subsidiary	¢	50,623,301	50,623,300	50,623,300
(BICSA)		50,471,454,394	49,805,156,511	46,322,264,824
	¢	50,522,077,695	49,855,779,811	46,372,888,124

The Bank holds a 49% stake in BICSA, which is represented in March 2015 and December 2014 by 6,506,563 ordinary shares (March 2014: 6,159,251 ordinary shares) of US\$10 par value each.

At a BICSA shareholders meeting held in April 2014, shareholders agreed to capitalize US\$7 million, which was booked in 2014 and included in BICSA's financial statements. As a result of the capitalization, total share capital amounted to US\$132.78 million, represented by 13,278,700 shares of US\$10 par value each.

## Notes to Consolidated Financial Statements

The Bank's investments in other financial and non-financial entities are as follows:

	March 2015	December 2014	March 2014
National Stock Exchange	2 15,000,000	15,000,000	15,000,000
Central de Valores de la Bolsa			
Nacional de Valores, S.A.	15,000,000	15,000,000	15,000,000
Interclear Central de Valores, S.A.	15,000,000	15,000,000	15,000,000
Depósito Libre Comercial de Golfito			
(Golfito Duty Free Shopping			
Center) per article 24 of Law No.			
7131	5,200,000	5,200,000	5,200,000
Other entities	423,300	423,300	423,300
Ģ	50,623,300	50,623,300	50,623,300

- The shares held in the Costa Rican National Stock Exchange are required by the Securities Market Regulatory Law for the Brokerage Firm to operate as a brokerage firm. Those shares are carried at cost rather than fair value because they were withdrawn from public offering. Accordingly, they are not listed and are only traded by brokerage firms and the Costa Rican National Stock Exchange.
- As of March 31, 2015 and December 31 and March, 31, 2014, the Brokerage Firm booked investments in the National Stock Exchange and Interclear Central de Valores, S.A. for \$\psi\$15,000,000 each, to operate as a custodian of electronic securities.
- As of March 31, 2015 and December 31 and March, 31, 2014, the Bank holds investments in other non-financial entities, the most significant of which is the investment in the Golfito Duty Free Shopping Center for ¢5,200,000. The remaining ¢423,300 of the balance of investments in other non-financial entities booked as of those dates corresponds to investments in various cooperatives.

# Notes to Consolidated Financial Statements

# (10) <u>Property and equipment</u>

Property and equipment is as follows:

	March 2015					
			Furniture and	Computer		
	Land	Buildings	equipment	hardware	Vehicles	Total
Cost:		-				
Opening balance	¢ 43,172,317,837	110,297,273,275	54,512,881,977	53,524,427,013	453,581,087	261,960,481,189
Additions	-	6,770,757,014	1,126,753,209	564,715,826	-	8,462,226,049
Retirements	-	-	(279,764,501)	(587,459,286)	(2,593,675)	(869,817,462)
Adjustments	(161,199)	-	(312,847)	312,847	-	(161,199)
Reclassifications		-	260,505	(260,505)	-	-
Closing balance	43,172,156,638	117,068,030,289	55,359,818,343	53,501,735,895	450,987,412	269,552,728,577
Accumulated depreciation:						_
Opening balance	-	26,840,836,640	27,066,836,851	40,296,173,459	290,977,529	94,494,824,479
Depreciation expense on historical						
cost	-	243,205,065	1,136,495,096	1,205,352,510	10,112,953	2,595,165,624
Depreciation expense on						
revaluation	-	328,172,729	-	-	-	328,172,729
Retirements	-	-	(245,026,384)	(514,525,255)	(2,322,599)	(761,874,238)
Adjustments	-	-	2,789,588	174,228	-	(2,963,816)
Reclassifications		-	287,614	(287,614)	-	
Closing balance		27,412,214,434	27,961,382,765	40,986,887,328	298,767,883	96,659,252,410
Net closing balance	¢ 43,172,156,638	89,655,815,855	27,398,435,578	12,514,848,567	152,219,529	172,893,476,167

# Notes to Consolidated Financial Statements

De	ecember	2014
turo	and	Cor

			December	2014		
			Furniture and	Computer		_
	Land	Buildings	equipment	hardware	Vehicles	Total
						_
¢	42,478,456,440	109,501,340,751	52,265,462,768	52,185,579,034	454,783,747	256,885,622,740
	693,861,397	2,735,561,071	5,214,259,638	5,049,754,183	-	13,693,436,289
	-	-	(3,035,477,512)	(3,612,495,106)	(1,222,260)	(6,649,194,878)
	-	(1,939,628,547)	(11,203,983)	(18,570,032)	19,600	(1,969,382,962)
	_	-	79,841,066	(79,841,066)	-	
	43,172,317,837	110,297,273,275	54,512,881,977	53,524,427,013	453,581,087	261,960,481,189
	-	26,226,274,877	25,157,036,475	39,286,222,536	245,537,133	90,915,071,021
	-	1,586,922,291	4,368,524,426	4,584,089,714	46,643,055	10,586,179,486
	-	1,462,442,151	-	-	-	1,462,442,151
	-	-	(2,604,236,670)	(3,598,577,617)	(1,222,260)	(6,204,036,547)
	-	(2,434,802,679)	73,453,410	96,498,037	19,600	(2,264,831,632)
	_	-	71,939,566	(71,939,566)	-	
		26,840,836,640	27,066,717,207	40,296,293,104	290,977,528	94,494,824,479
¢	43,172,317,837	83,456,436,635	27,446,164,770	13,228,133,909	162,603,559	167,465,656,710
		¢ 42,478,456,440 693,861,397 - - - 43,172,317,837 - - - - -	\$\psi\$ 42,478,456,440 \\ 693,861,397 \\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Land         Buildings         Furniture and equipment           \$\psi\$ 42,478,456,440         109,501,340,751         52,265,462,768           693,861,397         2,735,561,071         5,214,259,638           -         -         (3,035,477,512)           -         (1,939,628,547)         (11,203,983)           -         -         79,841,066           43,172,317,837         110,297,273,275         54,512,881,977           -         26,226,274,877         25,157,036,475           -         1,586,922,291         4,368,524,426           -         1,462,442,151         -           -         (2,604,236,670)         73,453,410           -         (2,434,802,679)         73,453,410           -         -         71,939,566           -         26,840,836,640         27,066,717,207	Land         Buildings         Furniture and equipment         Computer hardware           \$\psi\$ 42,478,456,440         109,501,340,751         52,265,462,768         52,185,579,034           693,861,397         2,735,561,071         5,214,259,638         5,049,754,183           -         -         (3,035,477,512)         (3,612,495,106)           -         (1,939,628,547)         (11,203,983)         (18,570,032)           -         -         79,841,066         (79,841,066)           43,172,317,837         110,297,273,275         54,512,881,977         53,524,427,013           -         26,226,274,877         25,157,036,475         39,286,222,536           -         1,586,922,291         4,368,524,426         4,584,089,714           -         -         (2,604,236,670)         (3,598,577,617)           -         -         (2,434,802,679)         73,453,410         96,498,037           -         -         71,939,566         (71,939,566)           -         26,840,836,640         27,066,717,207         40,296,293,104	Land         Buildings         Furniture and equipment         Computer hardware         Vehicles           \$\psi\$ 42,478,456,440         109,501,340,751         52,265,462,768         52,185,579,034         454,783,747           693,861,397         2,735,561,071         5,214,259,638         5,049,754,183         -           -         -         (3,035,477,512)         (3,612,495,106)         (1,222,260)           -         (1,939,628,547)         (11,203,983)         (18,570,032)         19,600           -         -         79,841,066         (79,841,066)         -           43,172,317,837         110,297,273,275         54,512,881,977         53,524,427,013         453,581,087           -         26,226,274,877         25,157,036,475         39,286,222,536         245,537,133           -         1,586,922,291         4,368,524,426         4,584,089,714         46,643,055           -         1,462,442,151         -         -         -           -         2(2,604,236,670)         (3,598,577,617)         (1,222,260)           -         (2,434,802,679)         73,453,410         96,498,037         19,600           -         -         71,939,566         (71,939,566)         -           -         26,84

# Notes to Consolidated Financial Statements

B 4	r	1 /	<b>1</b> 0	1 1
11/	arc	n	201	1 /1

				IVIaicii 2	2014		
				Furniture and	Computer		_
		Land	Buildings	equipment	hardware	Vehicles	Total
Cost:							_
Opening balance	¢	42,478,456,440	109,501,340,751	52,265,462,768	52,185,579,034	454,783,746	256,885,622,739
Additions		-	255,867,960	1,094,883,178	1,039,708,951	-	2,390,460,089
Retirements		-	-	(476,167,565)	(3,414,925,755)	-	(3,891,093,320)
Adjustments		-	-	14,015,708	(14,936,704)	-	(920,996)
Reclassifications			-	90,340	(90,340)	-	
Closing balance		42,478,456,440	109,757,208,711	52,898,284,429	49,795,335,186	454,783,746	255,384,068,512
Accumulated depreciation:							
Opening balance		-	26,226,274,877	25,157,036,475	39,286,222,536	245,537,132	90,915,071,020
Depreciation expense on historical							
cost		_	645,873,729	1,076,192,279	1,144,700,304	11,527,642	2,878,293,954
Depreciation expense on							
revaluation		-	454,368,214	-	-	-	454,368,214
Retirements		-	-	(394,878,200)	(3,402,397,961)	-	(3,797,276,161)
Adjustments		-	-	12,652,533	43,021,352	-	55,673,885
Reclassifications		-	-	14,381,266	(14,381,266)	-	-
Closing balance			27,326,516,820	25,865,384,353	37,057,164,965	257,064,774	90,506,130,912
Net closing balance	¢	42,478,456,440	82,430,691,891	27,032,900,076	12,738,170,221	197,718,972	164,877,937,600

# Notes to Consolidated Financial Statements

# (11) Other assets

# Other assets are as follows:

		March 2015	December 2014	March 2014
Deferred charges:		<u> </u>		
Leasehold improvements	¢	851,625,636	831,999,093	1,192,196,071
Cost of issue of financial				
instruments (3)		1,332,089,575	1,401,680,466	1,576,222,194
Cost of subordinated debt				
project		593,245,875	615,917,148	1,002,876
Deferred direct costs related				
to loans		14,320,914,112	13,834,802,293	3,041,041,049
Other deferred charges		4,642,260,779	4,973,694,393	5,972,928,692
Subtotal		21,740,135,978	21,658,093,393	11,783,390,882
Intangible assets:				
Software (2)		4,094,535,520	4,500,259,966	2,448,426,292
Other intangible assets (2)		2,487,278	2,487,278	2,487,278
Subtotal		4,097,022,798	4,502,747,244	2,450,913,570
Other assets:				
Prepaid interest and fees and				
commissions		265,484,389	218,164,300	310,923,747
Estimated tax		334,332,397	393,627,806	15,214,874
Prepaid insurance policy		324,834,464	274,222,485	326,059,749
Other prepaid expenses		405,791,971	728,793,671	487,742,533
Stationery, office supplies,		, ,	, ,	, ,
and other materials		287,093,050	377,118,432	178,874,430
Leased assets		149,649,681	149,956,917	150,889,483
Library and artwork		339,889,924	342,335,900	342,414,341
Construction work-in-				
progress		9,879,940,914	17,031,899,617	12,275,389,041
Software under development		261,461,555	254,109,573	217,296,189
Rights in welfare and trade				
associations		600,000	600,000	600,000
Other sundry assets		1,987,204,651	1,784,494,330	1,270,474,814
Cash shortages		50,000	-	-
Operations pending				
settlement		3,755,978,068	3,179,252,421	8,584,788,923
Other operations pending				
application		500,004,891	452,187,725	512,645,037
Guarantee deposits (1)		273,766,858	255,640,680	199,982,892
Legal and administrative				
deposits (1)		116,671,775	78,912,799	46,054,304
Subtotal		18,882,754,588	25,521,316,656	24,919,350,357
Total	¢	44,719,913,362	51,682,157,293	39,153,654,809

## Notes to Consolidated Financial Statements

- (1) As of March 31, 2015, guarantee deposits amount to ¢390,438,633 (December 2014: ¢334,553,479 and December and March 2014: ¢246,037,196, see note 2).
- (2) Intangible assets, net are as follows:

			March 2015	
			Other	
			intangible	
		Software	assets	Total
Cost:				
Opening balance	¢	19,066,822,045	96,516,837	19,163,338,882
Additions		124,904,093	2,487,278	127,391,371
Retirements		(42,744,721)	<del>-</del>	(42,744,721)
Reclassifications	_	-	(2,487,278)	(2,487,278)
Closing balance	_	19,148,981,417	96,516,837	19,245,498,254
Accumulated amortization:				
Opening balance		14,566,562,079	94,029,559	14,660,591,638
Expense for the year		530,628,540	2,487,278	533,115,818
Retirements		(42,744,721)	-	(42,744,721)
Reclassifications		-	(2,487,278)	(2,487,278)
Closing balance		15,054,445,898	94,029,559	15,148,475,457
Net closing balance	¢	4,094,535,519	2,487,278	4,097,022,797
	_			
	_		December 2014	
			Other	
			intangible	
	_	Software	assets	Total
Cost:		17.001.007.000	0 4 7 4 4 0 0 7	17 000 701 010
Opening balance	¢	15,834,005,003	96,516,837	15,930,521,840
Additions		3,598,000,565	9,949,112	3,607,949,677
Retirements		(265,209,329)	- (0.040.440)	(265,209,329)
Reclassifications		(63,943,006)	(9,949,112)	(73,892,118)
Adjustments	_	(36,031,188)		(36,031,188)
Closing balance	_	19,066,822,045	96,516,837	19,163,338,882
Accumulated amortization:				
Opening balance		13,016,984,268	94,029,559	13,111,013,827
Expense for the year		1,793,014,994	9,949,112	1,802,964,106
Retirements		(243,437,183)	-	(243,437,183)
Reclassifications	_		(9,949,112)	(9,949,112)
Closing balance		14,566,562,079	94,029,559	14,660,591,638
Net closing balance	¢	4,500,259,966	2,487,278	4,502,747,244

## Notes to Consolidated Financial Statements

March 2014 Other intangible Software assets Total Cost: 15,834,005,002 Opening balance 96,516,837 15,930,521,839 Additions 109,224,366 2,487,278 111,711,644 Retirements (143,335,687)(143,335,687)Reclassifications (2,487,278)(2,487,278)15,799,893,681 Closing balance 96,516,837 15,896,410,518 Accumulated amortization: Opening balance 13,016,984,268 94,029,559 13,111,013,827 Expense for the year 478,005,752 478,005,752 Retirements (143,522,631)(143,522,631)94,029,559 13,445,496,948 Closing balance 13,351,467,389 2,450,913,570 Net closing balance 2,448,426,292 2,487,278

## (3) Costs related to the issue of financial instruments are as follows:

		March 2015				
		5-year issue	10-year issue	Total		
Commission - structuring banks	¢	263,680,000	263,680,000	527,360,000		
Commission - Moody's Investors Service		131,840,000	131,840,000	263,680,000		
Commission - Société de la Bourse de Luxembourg, S.A.		6,444,867	6,444,867	12,889,734		
RR Donelley		5,773,010	5,772,989	11,545,999		
BNY Mellon		2,084,654	2,084,654	4,169,308		
Moody's - issuer rating		17,455,616	17,455,616	34,911,232		
Fitch Ratings		131,840,000	131,840,000	263,680,000		
Milbank		77,606,298	77,606,298	155,212,596		
Shearman & Sterling		77,707,023	77,707,023	155,414,046		
External audit		100,198,400	100,198,400	200,396,800		
Subtotal		814,629,868	814,629,847	1,629,259,715		
Deferral	_	(210,523,631)	(86,646,509)	(297,170,140)		
Total	¢	604,106,237	727,983,338	1,332,089,575		

# Notes to Consolidated Financial Statements

			December 2014	
		5-year issue	10-year issue	Total
Commission - structuring banks	¢	266,655,000	266,655,000	533,310,000
Commission - Moody's Investors Service		133,327,500	133,327,500	266,655,000
Commission - Société de la Bourse de Luxembourg, S.A.		6,517,582	6,517,582	13,035,164
RR Donelley		5,838,145	5,838,123	11,676,268
BNY Mellon		2,108,174	2,108,174	4,216,348
Moody's - issuer rating		17,652,561	17,652,561	35,305,122
Fitch Ratings		133,327,500	133,327,500	266,655,000
Milbank		78,481,900	78,481,900	156,963,800
Shearman & Sterling		78,583,762	78,583,762	157,167,524
External audit	_	101,328,900	101,328,900	202,657,800
Subtotal		823,821,024	823,821,002	1,647,642,026
Deferral	_	(174,321,409)	(71,640,151)	(245,961,560)
Total	¢	649,499,615	752,180,851	1,401,680,466
	_		March 2014	
	_	5-year issue	10-year issue	Total
Commission - structuring banks Commission - Moody's	¢	269,170,000	269,170,000	538,340,000
Investors Service Commission - Société de la		134,585,000	134,585,000	269,170,000
Bourse de Luxembourg, S.A.		6,578,683	6,578,683	13,157,366
RR Donelley		5,893,351	5,893,351	11,786,701
BNY Mellon		2,128,125	2,128,125	4,256,251
Moody's - issuer rating		17,819,054	17,819,054	35,638,108
Fitch Ratings		134,585,000	134,585,000	269,170,000
Milbank		79,222,114	79,222,114	158,444,229
Shearman & Sterling		79,325,075	79,325,075	158,650,149
External audit	_	102,284,600	102,284,600	204,569,200
Subtotal	_	831,591,002	831,591,002	1,663,182,004
Deferral		(61,715,217)	(25,244,593)	(86,959,810)
Total	¢	769,875,785	806,346,409	1,576,222,194

Issue costs are amortized over the term of the financial instrument.

## Notes to Consolidated Financial Statements

# (12) Obligations with the public

# (a) By cumulative amount

Obligations with the public by cumulative amount are as follows:

	March 2015	December 2014	March 2014
Demand obligations:			
Checking accounts	1,134,514,771,173	1,198,704,476,197	1,118,384,423,871
Certified checks	103,356,627	103,521,169	139,966,686
Savings deposits	1,034,780,675,484	1,015,801,186,963	994,414,035,994
Matured term deposits	22,723,182,691	19,745,314,768	19,985,244,106
Other demand deposits	23,990,291,833	24,057,553,654	28,598,393,588
Drafts and transfers	187,046,322	198,809,563	232,376,827
Cashier's checks	6,049,981,933	6,126,485,979	5,922,783,187
Advance collections from			
customers for credit	6,775,328,516	7,450,712,822	6,126,443,775
cards			
Obligations for trust funds	47,303,580	118,941,091	28,018,022
Subtotal	2,229,171,938,161	2,272,307,002,207	2,173,831,686,056
Term obligations:			
Deposits from the public	1,280,244,923,355	1,308,840,107,479	1,243,796,707,412
Other term deposits	84,036,545,960	79,219,422,491	59,902,865,176
Subtotal	1,364,281,469,315	1,388,059,529,970	1,303,699,572,588
Other obligations with the			
public:			
Obligations for tri-party	20 004 152 000	21 020 041 772	20 200 200 202
repurchase agreements	39,984,152,088	31,028,841,773	39,892,329,298
Subtotal	39,984,152,088	31,028,841,773	39,892,329,298
Charges payable for			
obligations with the	20,321,790,267	19,356,766,578	16,656,850,737
public	, , ,	, ,	, ,
Total	3,653,759,349,831	3,710,752,140,528	3,534,080,438,679
,			

## Notes to Consolidated Financial Statements

As of March 31, 2015 and 2014, deposits in checking accounts denominated in colones bear interest at a maximum rate of 2% per annum on balances and at a minimum rate of 0.25% per annum on balances greater than or equal to ¢500,001. Deposits in checking accounts denominated in U.S. dollars bear interest at a maximum rate of 0.05% per annum on balances and at a minimum rate of 0.01% per annum on balances greater than or equal to US\$1,000.

Term obligations correspond to term certificates of deposit in colones, U.S. dollars, and euros. Term certificates bear annual interest at the following rates:

Currency	March 2015	December 2014	March 2014
Colones	3.00% to 6.25%	3.52% to 7.05%	3.00% to 6.25%
U.S. Dollars	0.25% to 1.80%	0.50% to 2.15%	0.25% to 1.80%
Euros	0.06% to 0.39%	0.02% to 0.10%	0.06% to 0.39%

The Bank has term certificates of deposit that are restricted to secure certain loan operations. As of March 31, 2015, those term certificates of deposit amount to ¢26,172,684,034 (December 2014: ¢23,805,901,801 and March 2014: ¢19,157,562,653). As of that date, the Bank has no inactive deposits with State-owned entities or other banks.

## (b) By number of customers

The obligations with the public by number of customers are as follows:

_	March 2015	December 2014	March 2014
Obligations with the public:			
Demand	1,791,477	1,777,763	1,741,569
Term	66,403	64,441	67,591

# Notes to Consolidated Financial Statements

Demand and term deposits from customers by cumulative amount are as follows:

		March 2015	December 2014	March 2014
Obligations with the public:		_		
Deposits from the public	¢	3,613,775,197,743	3,679,723,298,756	3,494,188,109,381
Obligations for tri-party				
repurchase agreements		39,984,152,088	31,028,841,773	39,892,329,298
Subtotal		3,653,759,349,831	3,710,752,140,528	3,534,080,438,679
Obligations with State-owned				
entities:				
Deposits from State-owned				
entities		171,605,579	182,746,931	22,196,355,699
Subtotal		171,605,579	182,746,931	22,196,355,699
Obligations with financial entities:				
Deposits from other banks		175,866,218,497	133,980,076,375	100,510,523,686
Deposits from other local				, , ,
entities		4,300,944,492	1,818,472,759	12,322,796,098
Deposits from management of				
funds		156,184,717,910	156,295,635,782	139,387,431,913
Deposits from other foreign				
entities		793,368,032,975	790,899,550,363	819,841,529,236
Charges due to other entities		14,974,819,584	6,530,896,551	14,720,633,730
Subtotal		1,144,694,733,458	1,089,524,631,830	1,086,782,914,663
	¢	4,798,625,688,868	4,800,459,519,289	4,643,059,709,041

# (13) Obligations with BCCR

Obligations with BCCR are as follows:

		March 2015	December 2014	March 2014
Financing for loans using	_	_		
internal funds	¢	2,659,290	2,705,427	22,002,843,494
Financing for loans using				
external funds		168,926,210	179,746,885	190,567,560
Interest payable on				
obligations	_	20,079	294,619	2,944,645
Subtotal	¢ _	171,605,579	182,746,931	22,196,355,699

## Notes to Consolidated Financial Statements

# (14) Obligations with entities and subordinated obligations

# (a) Obligations with entities

Obligations with entities are as follows:

	March 2015	December 2014	March 2014
Demand:			
Checking accounts of local financial			
entities	¢ 91,568,315,498	123,921,208,197	80,102,866,957
Savings deposits from local financial			
entities	43,261,862	38,289,746	25,884,440
FCD fund management	156,184,717,910	156,295,635,782	139,387,431,913
Outstanding checks	4,728,368,224	3,421,821,488	9,910,290,411
Checking accounts and obligations			
with related parties	362,983,231	463,489,825	236,374,973
Other demand obligations with			
financial entities	550,944,493	443,472,759	572,796,098
Subtotal	253,438,591,218		230,235,644,792
Term:			
Term deposits from local financial			
entities	79,163,289,682	6,135,267,119	10,235,106,905
Term deposits from foreign financial	,,,	-,,,	-,,,-
entities (3)	538,655,486,043	537,734,760,627	528,559,060,847
Funds from liquidity market	5,100,000,000		-
Loans from local financial entities	3,750,000,000		1,750,000,000
Loans from foreign financial entities	, , ,	, , ,	, , ,
(1)(2)	249,612,546,931	250,664,789,736	291,282,468,389
Liquidity market operations	-	-	10,000,000,000
Subtotal	876,281,322,656	798,409,817,482	841,826,636,141
Charges payable for other demand and			
term obligations with financial			
entities –foreign currency	84,325,574	4,375,166	7,145,442
Charges payable for other demand and	0.,620,67.	1,070,100	7,2 10,1 12
term obligations with financial			
entities –local currency	596,151,570	73,523,264	76,670,008
Charges payable for loans with foreign	0,0,101,0,0	70,020,20	7 0,0 7 0,0 0 0
financial entities (1)	2,057,326,807	1,501,293,430	2,148,957,159
Charges payable for loans with local	2,007,020,007	1,001,290,100	2,1 .0,507,105
financial entities	14,348,958	7,476,563	10,710,070
Charges payable for term deposits	<i>y y</i>	, , , , , , , , ,	-,,
from foreign financial entities (3)	12,222,666,675	4,944,228,129	12,477,151,051
Subtotal	14,974,819,584		14,720,633,730
Total	¢ 1,144,694,733,458		1,086,782,914,663
	, , ,		, , , , ,

# Notes to Consolidated Financial Statements

# (1) Loans from foreign financial entities are as follows:

	An	nual interest ra	ate		Maturity			Balance	
<u>Entity</u>	March 2015	December 2014	March 2014	March 2015	December 2014	March 2014	March 2015	December 2014	March 2014
CABEI	4.55% to 8.00%	4.55% to 8.00%	4.55% to 8.00%	2015 to 2021	2015 to 2021	2015 to 2021	¢ 19,754,170,803	21,430,327,428	25,986,743,143
Barclays	6.20% to 6.65%	6.20% to 6.65%	6.20% to 6.65%	2023 to 2029	2023 to 2029	2023 to 2029	67,329,825,355	67,011,197,761	68,731,680,957
Standard Chartered			0.270/			2014			22.021.065.652
Bank Credit Suisse Bank	2.610/	2.500/	2.37%	-	-	2014	-	-	33,931,065,653
Citibank	3.61%	3.58%	3.97% 3.01% to	2017 2016 to	2017	2017	55,656,174,080	56,777,835,415	56,818,253,785
	3.01%	2.99%	3.02%	2017	2016 to 2017	2016 to 2017	105,742,540,025	106,946,722,562	107,963,682,010
KFW	3.32%	-	-	2023	-	-	3,187,163,475 ¢ 251,669,873,738	252,166,083,166	293,431,425,548

## Notes to Consolidated Financial Statements

(2) Guarantees backing the above loans are detailed in note 2.

Loans due to foreign financial entities bear interest at rates ranging between 3.01% and 8% per annum (December 2014: between 2.99% and 8% and March 2014: between 2.37% and 8% per annum).

(3) On October 29, 2013, the Bank made two international issues with a face value of US\$1 billion equivalent to \$\psi 523,149,030,400\$ in March 2015 (December 2014: \$\psi 529,051,519,650\$ and March 2014: \$\psi 534,041,355,100\$) and the following characteristics:

## a. <u>5-year issue</u>:

✓ Face value: US\$500 million ✓ Traded amount: 99.331%

✓ Term: 5 years

✓ Interest rate: 4.875% per coupon payment

✓ Maturity: November 1, 2018

## b. <u>10-year issue</u>:

✓ Face value: US\$500 million ✓ Traded amount: 99.072%

✓ Term: 10 years

✓ Interest rate: 6.250% per coupon payment

✓ Maturity: November 1, 2023

The balances of those issues in the accounting records are as follows:

	_	March 2015				
		5-year issue	10-year issue	Total		
Issue	¢	263,547,583,775	281,181,498,619	544,729,082,394		
Adjustment to fair value of item hedged measured at cost of international issues		(1,228,181,102)	(5,561,553,343)	(6,789,734,445)		
Amortization of discount in traded amount of issues		455,872,993	260,265,101	716,138,094		
Subtotal	_	262,775,275,666	275,880,210,377	538,655,486,043		
Charges payable		5,356,000,000	6,866,666,675	12,222,666,675		
Total	¢	268,131,275,666	282,746,877,052	550,878,152,718		

## Notes to Consolidated Financial Statements

			December 2014	
		5-year issue	10-year issue	Total
Issue	¢	264,871,078,050	264,180,441,600	529,051,519,650
Adjustment to fair value of item hedged measured at cost of international issues		(834,343,773)	8,924,915,278	8,090,571,505
Amortization of discount in traded amount of issues		377,479,815	215,189,657	592,669,472
Subtotal		264,414,214,092	273,320,546,535	537,734,760,627
Charges payable	_	2,166,571,875	2,777,656,254	4,944,228,129
Total	¢	266,580,785,967	276,098,202,789	542,678,988,756
	_		March 2014	
	_	5-year issue	10-year issue	Total
Issue	¢	264,606,684,637	260,881,851,983	525,488,536,620
Adjustment to fair value of item hedged measured at cost of international issues		1,059,033,834	1,802,022,111	2,861,055,945
Amortization of discount in traded amount of issues		133,639,648	75,828,634	209,468,282
Subtotal	_	265,799,358,119	262,759,702,728	528,559,060,847
Charges payable	_	5,467,515,625	7,009,635,426	12,477,151,051
Total	¢	271,266,873,744	269,769,338,154	541,036,211,898

A valuation was performed as of March 31, 2015 and December and March 31, 2014 in order to calculate the change in the fair value of the primary instrument based on the following inputs:

- ✓ A 5- or 10-year LIBOR rate at the issue of the bond;
- ✓ Discount rates from Bloomberg;
- Zero rates corresponding to the swap curve as of March 31, 2015 and December 31 and March, 31 2014;
- ✓ Only a portion of the bond cash flows is hedged (corresponding to the 5and 10-year LIBOR rate in effect at the issue of the bond) rather than the total interest rate;
- ✓ Accrued and earned interest were segregated from the instruments to obtain variations in clean prices;
- ✓ Forward rate to calculate variable interest.

### Notes to Consolidated Financial Statements

For the year ended March 31, 2015, the Bank booked an increase in the fair value of these issues in the amount of \$\psi 8,644,371,074\$ under "Other finance income" (December 2014: \$\psi 11,354,254,000\$ and March 2014: \$\psi 2,861,055,945\$, see note 28). For the year ended March 31, 2015, the Bank booked a decrease in the fair value of these issues in the amount of \$\psi 15,496,752,047\$ (December 2014: \$\psi 31,798,043,109\$ and March 2014: \$\psi 9,454,980,982\$) under "Other finance expenses". The balance of this account amounts to a total of \$\psi 15,563,787,101\$ (December 2014: \$\psi 32,412,368,057\$ and March 2014: \$\psi 9,664,694,372\$).

## Maturities of loans due to entities

Loans due to entities mature as follows:

		March 2015	
	Local	Foreign	Total
	-	433,623,432	433,623,432
	1,300,097,644	168,794,065,325	170,094,162,969
	125,644,412	-	125,644,412
	2,510,212,481	82,442,184,981	84,952,397,462
¢	3,935,954,537	251,669,873,738	255,605,828,275
_			
	Local	Foreign	Total
¢	-	584,686,485	584,686,485
	-	54,811,230,679	54,811,230,679
	1,436,872,528	117,193,596,699	118,630,469,227
	128,350,966	79,576,569,303	79,704,920,269
¢	1,565,223,494	252,166,083,166	253,731,306,660
	<u>.</u>		
		March 2014	
	Local	Foreign	Total
¢	32,004,109,448	33,931,065,653	65,935,175,101
	-	3,157,046,824	3,157,046,824
	1,824,467,229	173,408,280,097	175,232,747,326
	128,489,092	82,935,032,974	83,063,522,066
¢	33,957,065,769	293,431,425,548	327,388,491,317
	¢	1,300,097,644 125,644,412 2,510,212,481 \$\(\phi\) 3,935,954,537   Local  \$\(\phi\) -  1,436,872,528  128,350,966  \$\(\phi\) 1,565,223,494   Local  \$\(\phi\) 1,824,467,229  128,489,092	Local         Foreign           -         433,623,432           1,300,097,644         168,794,065,325           125,644,412         -           2,510,212,481         82,442,184,981           \$\frac{251,669,873,738}{251,669,873,738}\$           \$\frac{251,669,873,738}{251,669,873,738}\$           \$\frac{254,686,485}{254,686,485}\$           -         54,811,230,679           1,436,872,528         117,193,596,699           128,350,966         79,576,569,303           \$\phi\$         1,565,223,494         252,166,083,166           \$\frac{1}{252}\$         \$\frac{1}{252}\$           \$\phi\$         32,004,109,448         33,931,065,653           -         3,157,046,824           1,824,467,229         173,408,280,097           128,489,092         82,935,032,974

As of March 31, 2015 and 2014, loans due to local entities correspond to obligations with Banco Crédito Agrícola de Cartago and BCCR.

#### Notes to Consolidated Financial Statements

## (b) <u>Subordinated obligations</u>

The Bank's subordinated obligations are as follows:

Entity	Annual interest rates	Maturity		March 2015	December 2014
IDB	6-month LIBOR	08/15/2024	US\$	100,000,000	100,000,000
	+4.50% in the				
	first 5 years and				
	6-month LIBOR				
	+ 5.00%				
	thereafter				
CABEI	6-month LIBOR	10/23/2029			
	+ 5.25% in the				
	first 5 years and				
	6-month LIBOR				
	+ 5.75%				
	thereafter			30,000,000	30,000,000
Total			US\$	130,000,000	130,000,000
Total in colones			¢	68,556,800,000	69,330,300,000
Finance charges					
payable				474,812,194	1,027,971,862
- •			¢	69,031,612,194	70,358,271,862

For the year ended March 31, 2015, the Bank presents no instances of noncompliance with payments of principal or interest.

- As of March 31, 2015, the Bank's subordinated debt amounts to US\$130,000,000, which is equivalent to ¢69,031,612,194 (December 2014: ¢70,358,271,862). Subordinated debt was negotiated as follows:
- May 27, 2014: total face value of US\$100 million, equivalent to ¢52,732,000,000 with the Inter-American Development Bank (IDB) for a term of 10 years.
- October 23, 2014: total face value of US\$30 million, equivalent to ¢15,820,800,000, with the Central American Bank for Economic Integration (CABEI) for a term of 15 years. As of March 31, 2015, interest earned by subordinated liabilities amounts to US\$900,357 equivalent to ¢474,812,194 (December 2014: US\$1,927,532 equivalent to ¢1,027,971,862).
- In accordance with IRNBS, the debt of State-owned commercial banks will be secured with guarantees issued by the Government and all its divisions and institutions. Government guarantees provided for in the aforementioned regulations do not apply to subordinated loans subscribed by State-owned commercial banks or rights and obligations derived therefrom. Subordinated financial instruments or loans (and the rights and obligations derived therefrom) may only be subscribed by multilateral development banks or bilateral development organizations.

## Notes to Consolidated Financial Statements

Pursuant to SUGEF's prudential regulations on full unsubordinated debt prepayment by borrowers, if classified as Tier II capital, loans (including principal and interest) will be categorized as subordinated debt and ranked below other loans, such that borrowers will first fully repay any unsubordinated debt (existing on the effective date, or subsequently subscribed, assumed, or secured) in accordance with banking regulations.

## (15) <u>Income tax</u>

Pursuant to the Costa Rican Income Tax Law, the Bank is required to file annual income tax returns for the year ending March 31 of each year.

## a) Current period income tax

Income tax expense is as follows:

		March 2015	December 2014	March 2014
Current	¢	3,369,392,894	12,699,481,806	797,580,345
Decrease in income tax		-	(314,765,092)	-
	¢	3,369,392,894	12,384,716,714	797,580,345
	-			
		March 2015	December 2014	March 2014
Expected income tax on		_		
accounting income	¢	5,561,663,937	19,913,592,067	2,808,969,827
Plus (less):				
Nondeductible expenses		3,282,745,810	9,508,773,325	2,263,581,437
Deductible expenses		(313,424,500)	(1,337,337,859)	(152,911,958)
Nontaxable income		(5,192,319,213)	(16,162,151,613)	(4,167,683,157)
Taxable income		4,469,002	-	-
Tax loss from excess				
deductible expenses on				
taxable income		26,257,858	461,840,794	45,624,196
Subtotal income tax	¢	3,369,392,894	12,384,716,714	797,580,345
Less:		_		
Estimated income tax		(310,878,653)	(1,555,704,963)	-
Total income tax payable	-			
(note 17)	=	3,058,514,241	10,829,011,751	797,580,345

## Notes to Consolidated Financial Statements

# b) Prior period income tax

		March 2015	December 2014	March 2014
Decrease in Pension Fund	_	_		
Manager's prior period				
income tax	¢	-	1,743,205	5,529,339
Decrease in Insurance				
Brokerage Firm's prior				
period income tax		-	3,785,135	-
	¢	-	5,529,340	5,529,339
	_			

# c) <u>Deferred tax</u>

Deferred tax assets arise from temporary differences in the following financial statement items:

	_	March 2015	December 2014	March 2014
Unrealized losses	¢	1,164,421,564	1,484,152,904	2,188,782,119
Legal provisions		210,953,038	183,716,442	189,789,964
Subtotal	¢	1,375,374,602	1,667,869,346	2,378,572,083

As of March 31, 2015, movement in temporary differences that give rise to deferred tax assets is as follows:

		December 31, 2014	Included in income statement	Included in equity	March 31, 2015
Unrealized losses	¢	1,484,152,904	14,896,673	(334,628,013)	1,164,421,564
Legal provisions	¢	183,716,442 1,667,869,346	27,236,596 42,133,269	(334,628,013)	210,953,038 1,375,374,602

## Notes to Consolidated Financial Statements

As of December 31, 2014, movement in temporary differences that give rise to deferred tax assets is as follows:

		Included in		
	December 31, 2013	income statement	Included in equity	December 31, 2014
Unrealized losses ¢	2,009,931,243	-	(525,778,339)	1,484,152,904
Legal provisions	168,717,007	14,999,435	-	183,716,442
¢ _	2,178,648,250	14,999,435	(525,778,339)	1,667,869,346

As of March 31, 2014, movement in temporary differences that give rise to deferred tax assets is as follows:

		December 31, 2013	Included in income statement	Included in equity	March 31, 2014
Unrealized losses	¢	2,009,931,243	125,743,361	53,107,515	2,188,782,119
Legal provisions	•	168,717,007	21,072,957	-	189,789,964
	¢	2,178,648,250	146,816,318	53,107,515	2,378,572,083

Deferred tax liabilities arise from temporary differences in the following financial statement items:

	_	March 2015	December 2014	March 2014
Revaluation of assets	¢	13,283,636,328	13,283,636,328	13,283,636,327
Unrealized gains		1,074,260,114	883,882,942	224,034,788
	¢	14,357,896,442	14,167,519,270	13,507,671,115

As of March 31, 2015, movement in temporary differences that give rise to deferred tax liabilities is as follows:

		December 31, 2014	Included in income statement	Included in equity	March 31, 2015
Revaluation of assets Unrealized gains	¢	13,283,636,328	-	-	13,283,636,328
		883,882,942	-	190,377,172	1,074,260,114
	¢	14,167,519,270		190,377,172	14,357,896,442

## Notes to Consolidated Financial Statements

As of December 31, 2014, movement in temporary differences that give rise to deferred tax liabilities is as follows:

		December 31, 2013	Included in income statement	Included in equity	December 31, 2014
Revaluation of assets Unrealized gains	¢	13,605,138,374	-	(321,502,046)	13,283,636,328
Omeanzed gams	¢	671,583,288 14,276,721,662		212,299,654 (109,202,392)	883,882,942 14,167,519,270

As of March 31, 2014, movement in temporary differences that give rise to deferred tax liabilities is as follows:

		December 31, 2013	Included in income statement	Included in equity	March 31, 2014
Revaluation of assets Unrealized gains	¢	13,605,138,374	-	(321,502,047)	13,283,636,327
Cincuitzou gains		671,583,288	282,053,323	(729,601,823)	224,034,788
	¢	14,276,721,662	282,053,323	(1,051,103,870)	13,507,671,115

A deferred tax liability represents a taxable temporary difference and a deferred tax asset represents a deductible temporary difference.

Tax returns filed by the Bank for the years ended March 31, 2010, 2011, 2012, and 2013, and the tax return that will be filed for the year ended 2014, are open to review by Tax Authorities.

## (16) Provisions

Provisions are as follows:

		March 2015	December 2014	March 2014
Severance benefits	¢	14,281,612,685	28,436,142,592	22,262,134,062
Litigation		2,578,318,880	2,680,918,923	9,585,442,181
Other		11,467,635,191	8,385,833,140	9,717,548,783
	¢	28,327,566,756	39,502,894,655	41,565,125,026

## Notes to Consolidated Financial Statements

## Movement in provisions is as follows:

		Severance			
		benefits	Litigation	Other	Total
Balance at December 31,					
2013	¢	32,453,960,945	9,468,849,446	8,200,794,772	50,123,605,163
Provisioned		9,417,659,133	2,225,648,166	3,692,388,327	15,335,695,626
Used		(19,609,486,016)	(2,108,329,433)	(2,175,447,917)	(23,893,263,366)
Decrease in provisions					
against profit			(725,998)	(186,399)	(912,397)
Balance at March 31, 2014	¢	22,262,134,062	9,585,442,181	9,717,548,783	41,565,125,026
Balance at December 31,				_	
2013		32,453,960,945	9,468,849,446	8,200,794,772	50,123,605,163
Provisioned		9,942,743,000	1,333,646,569	7,986,651,475	19,263,041,044
Used		(13,959,071,685)	(387,507,369)	(7,127,857,932)	(21,474,436,986)
Decrease in provisions					
against profit		(1,489,668)	(7,734,069,723)	(673,755,175)	(8,409,314,566)
Balance at December 31, 2014	¢	28,436,142,592	2,680,918,923	8,385,833,140	39,502,894,655
Provisioned		1,436,530,957	67,400,279	3,773,447,506	5,277,378,742
Used		(12,315,642,164)	(13,884,621)	(691,477,383)	(13,021,004,168)
Decrease in provisions			( , , , ,	, , , ,	, , , , ,
against profit		(3,275,418,700)	(156, 115, 701)	(168,072)	(3,431,702,473)
Balance at March 31, 2015	¢	14,281,612,685	2,578,318,880	11,467,635,191	28,327,566,756

The provision for litigation is as follows:

		March 2015	December 2014	March 2014
Ordinary suits	¢	1,888,740,991	1,998,040,666	9,166,564,772
Ordinary suits against subsidiaries		273,434,956	265,110,324	5,107,409
Phishing		416,142,933	417,767,933	413,770,000
	¢	2,578,318,880	2,680,918,923	9,585,442,181

As of March 31, 2015 and 2014, the Bank is a defendant in litigation and management considers that an outflow of economic benefits will be required to settle the corresponding obligations. The Bank has estimated future disbursements and made the following provisions:

#### Notes to Consolidated Financial Statements

- Ordinary suits filed against the Bank have been estimated at \$\psi 65,793,311,138\$ (December 2014: \$\psi 65,961,788,888\$ and March 2014: \$\psi 65,573,262,871\$) and US\$344,891,608 (December 2014: US\$341,991,608 and March 2014: US\$352,326,678). Management of the Bank has provisioned \$\psi 1,888,740,991\$ (December 2014: \$\psi 1,998,040,666\$ and March 2014: \$\psi 9,166,564,772\$) for ordinary and labor suits and judicial litigation.
- For criminal proceedings in which the Bank is the civil defendant, the total potential liability has been estimated at ¢403,068,745 (December 2014: ¢427,042,800 and March 2014: ¢407,633,812). The amount provisioned by the Bank in connection therewith is included in the provision for ordinary suits.
- Labor suits by nature are difficult to estimate. However, they have been estimated at \$\psi\_5,524,041,955\$ (December 2014: \$\psi\_2,703,131,086\$ and March 2014: \$\psi\_2,692,897,555). The amount provisioned by the Bank in connection therewith is included in the provision for ordinary suits.
- The accounting records of the Bank's subsidiaries include provisions for ordinary suits filed against the subsidiaries for a total of ¢273,434,956 (December 2014: ¢265,110,324 and March 2014: ¢5,107,409).
  - The provision recognized by the Pension Fund Manager amounts to ¢265,110,324 in 2015 (December 2014: ¢265,110,324 and March 2014: ¢4,880,664).
  - The provision booked by the Investment Fund Manager amounts to ¢226,745 in 2014.
  - The provision booked by the Brokerage Firm amounts to \$\psi 8,324,632\$ in 2015.
  - The Insurance Brokerage Firm has not booked provisions for pending litigation.
- As of March 31, 2015, the Bank faces 514 administrative actions related to Internet fraud (phishing) for a total of ¢416,142,933 (December 2014: 514 administrative actions for a total of ¢417,767,933 and March 2014: 514 administrative actions for a total of ¢413,770,000). The Bank has provisioned 100% of that amount.

## Notes to Consolidated Financial Statements

## (17) Other sundry accounts payable

Other sundry accounts payable are as follows:

		March 2015	December 2014	March 2014
Professional fees	¢	2,906,554	3,220,299	5,457,807
Creditors - goods and services		3,222,525,801	2,729,365,999	4,939,503,561
Current tax (note 15)		3,368,601,712	10,829,011,751	797,580,345
Employer contributions (1)		7,954,414,621	9,152,489,769	6,573,999,304
Court-ordered withholdings		2,878,317,242	2,601,809,304	2,470,191,725
Tax withholdings		1,923,668,007	839,701,237	891,925,637
Employee withholdings		549,005,685	543,289,264	513,068,726
Other third-party withholdings		123,610,909	24,442,456	175,685,032
Compensation		2,348,448,841	6,962,434,513	1,979,411,615
Dividends		1,151,259	1,151,259	1,151,259
Statutory allocations		3,598,113,363	11,601,170,413	3,620,255,628
Obligation for loans with related parties		-	-	3,438
Clearing house operations		580,165,998	4,414,157,187	_
Accrued vacation		6,788,378,659	6,322,729,792	6,513,768,815
Accrued statutory Christmas bonus		3,493,560,133	1,633,351,748	3,130,190,198
Contributions to superintendencies		6,237,895	9,071,297	30,729,153
Foreclosed assets		453,475,048	502,916,892	369,186,955
Various creditors - Local currency			302,710,072	307,100,733
(2)		7,970,329,195	6,608,677,466	7,922,952,650
Various creditors - Foreign currency		6,587,916,183	4,539,087,339	5,141,285,157
Interest rate futures - Hedges (note 5-b)		-	206,726,657	1,630,181,711
FX futures - Other than hedges (note 5-b)		-	17,779,910	-
` '	¢	51,850,827,105	69,542,584,552	46,706,528,716

- (1) The "Employer contributions" line item mainly includes employer contributions due to the CCSS, Banco Popular y de Desarrollo Comunal, National Learning Institute (INA), and Mixed Institute of Social Welfare (IMAS).
- (2) As of March 31, 2015, the "Creditors goods and services" line item includes ¢2,587.50 million (December 2014: ¢956.3 million and March 2014: ¢1,079 million) for the operations of the Bank's Electronic Means of Payment Division (Visa). The remaining amount corresponds to normal operations of other divisions.

## Notes to Consolidated Financial Statements

# (18) Other liabilities

Other liabilities are as follows:

		March 2015	December 2014	March 2014
Deferred income:				
Deferred finance income	¢	10,086,708,935	8,985,345,777	3,883,227,786
Deferred fees and commissions				
for trust management		13,771,205	17,605,208	12,677,665
Other		76,410	311,487	311,533
Subtotal	_	10,100,556,550	9,003,262,472	3,896,216,984
Allowance for stand-by credit	_			
losses (1)		1,447,588,321	1,319,693,076	884,608,211
Operations pending application:	_			
Operations pending settlement		7,599,652,454	16,684,027,434	14,484,712,107
Other		11,070,346,319	7,077,390,105	17,198,735,564
Subtotal	¢	18,669,998,773	23,761,417,539	31,683,447,671
Total		30,218,143,644	34,084,373,087	36,464,272,866

# (1) Movement in the allowance for stand-by credit losses is as follows:

	March 2015	December 2014	March 2014
Opening balance ¢	1,319,693,076	138,964,729	138,964,729
Allowance expense charged to			
profit or loss (note 30)	141,812,012	1,196,180,293	699,784,457
Adjustment for foreign exchange			
differences	(13,916,767)	34,548,054	45,859,025
Decrease in allowance against			
income (note 31)	-	(50,000,000)	
Closing balance ¢	1,447,588,321	1,319,693,076	884,608,211

# (19) Equity

# (a) Share capital

The Bank's share capital is as follows:

	_	March 2015	December 2014	March 2014
Capital under Law No. 1644	¢	90,511,345,645	90,511,345,645	90,511,345,645
Bank capitalization bonds	_	27,618,957,837	27,618,957,837	27,618,957,837
	¢	118,130,303,482	118,130,303,482	118,130,303,482

#### Notes to Consolidated Financial Statements

- On December 23, 2008, the Executive Branch of the Costa Rican Government authorized a capital contribution funded under Law No. 8703 "Amendment to Law No. 8627 on the Ordinary and Extraordinary Budget of the Republic for Tax Year 2008." Such law grants funds to capitalize three State-owned banks, including the Bank, in order to stimulate productive sectors, particularly small and medium-sized enterprises. For such purposes, the Bank received four securities for a total of US\$50,000,000 (equivalent to ¢27,619,000,002) and denominated in DU maturing in 2013, 2017, 2018, and 2019 (No. 4183, No. 4184, No. 4185, and No. 4190 for DU10,541,265,09 each, at a reference exchange rate of ¢655.021 to DU1.00). As of March 31, 2015 and based on the exchange rate as of that date, the balance of those investments is ¢27,280,583,228 (December 2014: ¢27,328,967,634 and March 2014: ¢26,280,955,059) (see note 5-a).
- As of March 31, 2015, the Bank has appropriated ¢18,146,075,240 (December and March 2014: ¢14,548,173,826) from its earnings to form the equity of its FOFIDE.

## (b) <u>Revaluation surplus</u>

Revaluation surplus corresponds to the increase in fair value of property.

- As of March 31, 2015 and December 31 and March 31, 2014, revaluation surplus amounts to  $\phi$ 63,639,596,055.
- (c) Adjustment for valuation of available-for-sale investments and restricted financial instruments
- This item corresponds to variations in the fair value of available-for-sale investments and restricted financial instruments.
- As of March 31, 2015, the adjustment for valuation of available-for-sale investments and restricted financial instruments amounts to ¢1,453,050,011 (unrealized loss) (December 2014: ¢3,787,427,875 and March 2014: ¢5,846,148,566 (unrealized loss)).
- (d) Adjustment for valuation of investments in other companies
- This item corresponds to the valuation of the Bank's investments in other financial entities (companies or subsidiaries) over which the Bank exercises control or significant influence.

## Notes to Consolidated Financial Statements

As of March 31, 2015, the adjustment for valuation of investments in foreign associates by the equity method amounts to  $\phi$ 6,135,363,542 (December 2014:  $\phi$ 6,329,906,321 and March 2014:  $\phi$ 6,994,182,974). These investments correspond to the Bank's 49% ownership interest in BICSA and subsidiary.

## (20) <u>Commitments and contingencies</u>

The Bank has off-consolidated balance sheet commitments and contingencies that arise in the normal course of business and involve elements of credit and liquidity risk, and the notional amounts of foreign exchange derivatives, as follows:

	_	March 2015	March 2014
Performance bonds	¢	33,165,872,950	35,493,457,019
Bid bonds		2,383,879,638	2,021,188,601
Other guarantees		8,842,535,163	410,869,823
Letters of credit		4,946,875,743	18,092,863,388
Credits pending disbursement	_	321,533,728	327,477,686
Subtotal	_	49,660,697,222	56,345,856,517
Pre-approved lines of credit	_	200,990,074,394	187,576,369,274
Other contingencies not related to credits		532,022,775	258,440,889,918
Other contingencies - Pending litigation and			
lawsuits (note 44)		254,326,276,141	211,670,338
Subtotal	¢	455,848,373,310	446,228,929,530
FX futures - Other than hedges (note 5-b)	-	8,859,648,000	430,672,000
Total	¢	514,368,718,532	503,005,458,047

Letters of credit, guarantees, and sureties granted expose the Bank to credit loss in the event of noncompliance by the customer. The Bank's policies and procedures for approving credit commitments and financial guarantees are the same as those for granting loans booked. Guarantees and sureties granted have fixed maturity dates and, in most cases, no funds are disbursed on maturity. Therefore, they do not represent a significant exposure to liquidity risk. Most letters of credit are used and those used are generally available on demand, issued, and confirmed by correspondent banks, and payable immediately.

These commitments and contingent liabilities expose the Bank to credit risk since fees and commissions and losses are recognized in the consolidated balance sheet until the commitments are fulfilled or expire.

#### Notes to Consolidated Financial Statements

The Bank has off-consolidated balance sheet financial instruments (stand-by and without prior deposit) that arise in the normal course of business and involve elements of credit and liquidity risk. Those financial instruments include letters of credit, guarantees, and sureties without prior deposit.

Off-balance sheet financial instruments with risk (no prior deposit) and without risk (prior deposit) are as follows:

	March 2015	March 2014
Contingencies without prior deposit:		
Letters of credit	¢ 4,732,214,365	16,668,244,953
Guarantees and sureties granted	40,826,888,241	35,720,879,336
Subtotal	45,559,102,606	52,389,124,289
Contingencies with prior deposit:		
Letters of credit	214,661,377	1,424,618,435
Guarantees and sureties granted	3,565,399,511	2,204,636,106
Subtotal	3,780,060,888	3,629,254,541
Credits pending disbursement	321,533,728	327,477,687
Total	¢ 49,660,697,222	56,345,856,517

## (21) <u>Trust assets</u>

The Bank provides trust services whereby it manages assets at the direction of the customer. The Bank receives a fee for providing those services. Those assets, liabilities, and equity are not recognized in the Bank's consolidated financial statements. The Bank is not exposed to any credit risk relating to such placements, as it does not guarantee these assets.

The types of trusts managed by the Bank are as follows:

- Management and investment trusts
- Management trusts with a testamentary clause
- Guaranty trusts
- Housing trusts
- Management and investment public trusts

# Notes to Consolidated Financial Statements

# As of March 31, 2015, trust capital is invested in the following assets:

Nature of trust		Cash or property management	Securitization	Portfolio management	Guaranty	Testamentary	Custody of stock with testamentary clause	Custody and management of stock	Cash guaranty and management	Pre-sales management	Guaranty and custody of stock	Total
Trust assets												
Cash and due from												
banks	¢	119,642,717	913,143,496	1,154,361	39,433,132	-	7,805	8,329	-	949,248	-	1,074,339,088
Investment securities												
and term deposits		170,916,782,801	10,018,634,633	2,071,520,633	653,012,011,906	1,378,627,082	-	1,782,558	-	476,896,083	-	837,876,255,696
Loan portfolio		2,204,284,748	-	2,594,574,178	-	-	-	-	-	-	-	4,798,858,926
Accounts and accrued												
interest receivable		7,436,454,796	1,746,672,865	2,241,228,254	21,086,728	1,285	-	-	21,368,351	-	4,834,309	11,471,646,588
Foreclosed assets		39,671,431	-	5,669,320	-	-	-	-	-	-	-	45,340,751
Investments in other												
companies		1,422,220,498	-	-	-	2,332,000	2,406,000	-	-	-	843,776,000	2,270,734,498
Property and equipment		2,799,593,304	68,279,252,244	-	64,911,185,324	-	-	-	1,544,041,161	-	-	137,534,072,033
Other assets	_	48,054,134	580,483,704	22,594,068	2,480,996,021	63,510	-	-	-	-	-	3,132,191,437
Total	¢	184,986,704,429	81,538,186,942	6,936,740,814	720,464,713,111	1,381,023,877	2,413,805	1,790,887	1,565,409,512	477,845,331	848,610,309	998,203,439,017

# Notes to Consolidated Financial Statements

# As of March 31, 2014, trust capital is invested in the following assets:

						Custody of				Managemen		
	G 1		D 011			stock with	Custody and	Cash	<b>.</b>	t Custody	Guaranty and	
	Cash or property		Portfolio			testamentary	management	guaranty and	Pre-sales	and	custody of	
Nature of trust	management	Securitization	management	Guaranty	Testamentary	clause	of stock	management	management	Guaranty	stock	Total
Trust assets Cash and due from												
banks	234,840,247	3,488,183	5,185,797	21,141,949	808,212	7,967	-	-	915,196	1,345,850	-	267,733,401
Investment	¢											
securities and term	155,683,783,353	4,037,566,540	1,081,380,293	627,704,423,450	1,414,880,175	-	1,577,735	-	516,350,474	4,879,595	-	790,444,841,615
deposits												
Loan portfolio	1,839,426,565	429,320,594	2,100,120,650	55,930,866	-	-	-	-	-	-	-	4,424,798,675
Accounts and												
accrued interest	9,587,172,811	1,686,828,842	2,572,777,319	1,529,709	272,719	_	-	-	98,261	-	-	13,848,679,661
receivable												
Foreclosed assets	110,347,365	_	-	-	_	-	-	-	-	-	-	110,347,365
Investments in	001 404 141				2 220 000	2 204 000					0.61.244.000	1 057 460 141
other companies	991,484,141	-	-	-	2,330,000	2,304,000	-	-	-	-	861,344,000	1,857,462,141
Property and	2 952 900 625	72 471 025 050	5.070.006	71 162 100 024				1 544 041 161				140 027 026 594
equipment	2,852,809,635	73,471,025,858	5,970,096	71,163,189,834	-	-	-	1,544,041,161	<del>-</del>	-	-	149,037,036,584
Other assets	74,040,588	2,203,399	10,211,928	2,970,762,948	380,042	_	-	-	4,356	-	-	3,057,603,261
Total	¢ 171,373,904,705	79,630,433,416	5,775,646,083	701,916,978,756	1,418,671,148	3 2,311,967	1,577,735	1,544,041,161	517,368,287	6,225,445	861,344,000	963,048,502,703

## Notes to Consolidated Financial Statements

The types of trusts managed by the Bank are as follows:

## a) <u>Housing mortgage</u>

These trusts are exclusively dedicated to managing housing loan portfolios.

## b) <u>Cash or property management</u>

These trusts are dedicated to managing cash or property for any of several purposes, including investing the cash or property placed in the trust and making payments.

## c) Securitization

These trusts are used to obtain funds from liquid assets by issuing asset-backed securities.

## d) <u>Portfolio management</u>

These trusts are dedicated to managing portfolios of loans granted for housing, agriculture, or reforestation projects or for any other activity aimed at promoting the country's social and economic development.

## e) Special accounts

These accounts are "special" funds (not trusts) managed by BN-Fiduciaria that are created for different purposes in order to help facilitate the control, management, location, and future settlement of certain accounting items used to settle trust contingencies, the maturity of mortgage investment certificates (CIH), the management of fixed assets, etc.

## f) Guaranty

These trusts hold trust property that is to be transferred as a guaranty for loan operations at the direction of the trustor.

## g) <u>Testamentary</u>

The purpose of these trusts is to meet the listed needs of individuals identified by the trustors upon their death. Testamentary trusts include life insurance policies, wills, and inheritances.

## Notes to Consolidated Financial Statements

## h) <u>Custody of stock with testamentary clause</u>

These trusts hold in custody capital stock, plus an added value based on the testamentary trust agreement. The purpose of these trusts is to manage the assets represented by the aforementioned stock on behalf of third parties.

## (22) Other debit memoranda accounts

Other debit memoranda accounts are as follows:

	_	March 2015	March 2014
Pension Fund Manager's own investments in custody – Face value of principal	¢	5,741,054,000	5,680,351,000
Pension Fund Manager's own investments in custody – Coupons		1,382,871,734	746,112,642
Pension Fund Manager's own investments in custody – Number of shares		23	23
Guarantees received in the Bank's custody		5,389,240,415,696	5,263,028,721,050
Unused, authorized lines of credit		650,451,414,577	613,887,987,659
Write-offs		171,407,743,453	163,666,557,700
Finance income on non-accrual loans		7,249,460,430	6,968,117,037
Supporting documentation received in the Bank's custody		849	676
Nondeductible expenses		26,453,870,224	26,718,947,081
Nontaxable income		47,100,847,967	57,012,987,259
Other memoranda accounts	_	587,989,914,340	583,302,521,041
Subtotal		6,887,017,593,293	6,721,012,303,168
Third-party debit memoranda accounts (a)		2,041,347,225,855	1,862,204,225,313
Own debit memoranda accounts for custodial activities		463,219,992,367	236,868,830,730
Third-party debit memoranda accounts for custodial activities	_	8,667,024,298,743	7,919,421,016,595
Subtotal		11,171,591,516,965	10,018,494,072,638
Total	¢	18,058,609,110,258	16,739,506,375,806

(a) According to SUGEVAL Decision SGV-R-1706 of June 6, 2007, the Bank is registered with the National Registry of Securities and Brokers as a class C custodian, in conformity with current regulations.

## Notes to Consolidated Financial Statements

Other memoranda accounts by entity are as follows:

Bank	¢	15,273,461,074,455	14,231,173,753,066
Brokerage Firm (note 23)		1,550,124,732,368	1,426,405,920,403
Investment Fund Manager (note 24)		328,900,520,178	305,599,519,813
Pension Fund Manager (note 25)		906,122,783,257	776,327,182,524
	¢	18,058,609,110,258	16,739,506,375,806
Banking mandates are as follows:			
		M 1 2017	M 1 2014
		March 2015	March 2014
Management of banking			
mandates	¢	805,855,398,128	777,947,322,401
Assets in custody on behalf of			
third parties		392,901	2,359,967
"TUDES" securities received in			
custody from affiliates under			
article 75 of Law No. 7531		1,478,958,788	1,633,642,577
Pension funds (note 25)		897,481,165,589	768,231,286,155
Investment funds (note 24)		328,855,112,374	305,555,175,260
Portfolio management (note			
23-a)		7,676,198,075	8,834,438,953
	¢	2,041,347,225,855	1,862,204,225,313

March 2015 March 2014

## Notes to Consolidated Financial Statements

## (23) <u>Current and term brokerage operations and security portfolio management</u>

Memoranda accounts are summarized as follows:

		March 2015	March 2014
Own	-		
Trading securities in custody (note 23-a)	¢	5,979,036,317	9,677,320,675
Trading securities pledged as guarantees		43,270,420,403	41,010,404,662
Confirmed cash agreements pending settlement		-	1,546,815,366
Repurchase agreements pending settlement (note 23-b)		40,211,259,138	40,070,875,683
Other own memoranda accounts		5,287,817,881	5,405,502,897
	-	94,748,533,739	97,710,919,283
Third-party			
Trading securities in custody (note 23-a)		1,277,375,925,543	1,197,498,684,406
Trading securities received as guarantees		39,098,575,209	34,680,402,899
Trading securities pledged as guarantees		52,754,363,167	27,596,122,111
Trading securities pending receipt		617,820,801	3,685,082,261
Trading securities pending settlement		596,452,788	3,607,216,707
Repurchase agreements pending settlement (note 23-b)		76,218,702,334	50,875,232,935
Cash and accounts receivable		1,038,160,712	1,917,820,848
Portfolio management		7,676,198,075	8,834,438,953
		1,455,376,198,629	1,328,695,001,120
	¢	1,550,124,732,368	1,426,405,920,403
	_		

In accordance with the Regulations on Repurchase Agreements and the Regulations on Term Operations, all operations are backed by guarantees in order to cover any related contingencies.

Securities that back repurchase agreements are held in the custody of CEVAL or in foreign entities with which CEVAL has custody agreements.

# Notes to Consolidated Financial Statements

# a) Securities held in custody are as follows:

Location	Type of custody		March 2015	March 2014
Custodial act	tivities on own behalf			
Local	At face value - available	¢	5,861,025,202	8,081,667,243
Local	At purchase value of shares - available		21,561,315	21,561,315
Local	At purchase value of investments - available		64,783,341	511,425
Local	At face value - pledged		31,300,000	11,300,000
Local	Amount of physical coupons - pledged		366,459	280,692
Local	At face value - pending delivery		-	1,562,000,000
	•	_	5,979,036,317	9,677,320,675
Custodial ac	ctivities on behalf of third			
Local	At face value - available		923,992,316,435	803,301,346,660
Local	Amount of physical coupons - available		8,567,473	32,776,673
Local	At purchase value of shares - available		47,188,296,195	49,210,664,922
Local	At purchase value of investments - available		303,885,903,246	342,133,580,981
Local	At face value - pledged		2,193,128,560	2,576,635,617
Local	At purchase value of shares - pledged		58,585,572	91,517,055
Local	At purchase value of investments - pledged		33,307,261	91,162,498
Local	At face value - pending delivery		15,820,801	61,000,000
	•		1,277,375,925,543	1,197,498,684,406
		¢	1,283,354,961,860	1,207,176,005,081

## Notes to Consolidated Financial Statements

b) Term buyer and seller positions in tri-party repurchase agreements involving the Brokerage Firm are as follows:

March 2015							
	n buyer		Term seller				
		U.S. dollars expressed in				U.S. dollars expressed in	
Colones	U.S. dollars	colones	Total	Colones	U.S. dollars	colones	Total
32,051,792,543	15,472,290	8,159,466,595	40,211,259,138	-	-	-	-
19,720,263,049	41,807,623	22,047,668,039	41,767,931,088	22,783,576,720	22,123,776	11,667,194,524	34,450,771,246
51,772,055,592	57,279,913	30,207,134,634	81,979,190,226	22,783,576,720	22,123,776	11,667,194,524	34,450,771,246
	19,720,263,049	Colones         U.S. dollars           32,051,792,543         15,472,290           19,720,263,049         41,807,623	Colones         U.S. dollars         expressed in colones           32,051,792,543         15,472,290         8,159,466,595           19,720,263,049         41,807,623         22,047,668,039	Term buyer           U.S. dollars         expressed in colones         Total           32,051,792,543         15,472,290         8,159,466,595         40,211,259,138           19,720,263,049         41,807,623         22,047,668,039         41,767,931,088	Term buyer           U.S. dollars expressed in colones         Total         Colones           32,051,792,543         15,472,290         8,159,466,595         40,211,259,138         -           19,720,263,049         41,807,623         22,047,668,039         41,767,931,088         22,783,576,720	Term buyer         Term buyer           Colones         U.S. dollars expressed in colones         Total         Colones         U.S. dollars           32,051,792,543         15,472,290         8,159,466,595         40,211,259,138         -         -           19,720,263,049         41,807,623         22,047,668,039         41,767,931,088         22,783,576,720         22,123,776	Term buyer         Term seller           Colones         U.S. dollars expressed in colones         Total         Colones         U.S. dollars expressed in colones           32,051,792,543         15,472,290         8,159,466,595         40,211,259,138         -         -         -         -           19,720,263,049         41,807,623         22,047,668,039         41,767,931,088         22,783,576,720         22,123,776         11,667,194,524

Own Third parties Total

	March 2014								
		Terr	m buyer		Term seller				
	Colones	U.S. dollars	U.S. dollars expressed in colones	Total	Colones	U.S. dollars	U.S. dollars expressed in colones	Total	
Own Third	34,344,520,803	10,637,060	5,726,354,880	40,070,875,683	-	-	-	-	
parties	9,598,860,351	20,568,550	11,072,873,326	20,671,733,677	20,453,392,946	18,111,428	9,750,106,312	30,203,499,258	
Total	43,943,381,154	31,205,610	16,799,228,206	60,742,609,360	20,453,392,946	18,111,428	9,750,106,312	30,203,499,258	

- As of March 31, 2015, term buyer and seller positions in tri-party repurchase agreements in U.S. dollars were valued at the exchange rate of ¢527.36 to US\$1.00 (2014: ¢538.34 to US\$1.00).
- c) The maturity structure of term buyer and seller positions in tri-party repurchase agreements involving the Brokerage Firm is as follows:

		March 2015					
	Term bu	iyer	Term seller				
	Colones	U.S. dollars	Colones	U.S. dollars			
Own							
1 to 30 days	¢ 6,744,639,861	5,313,235	-	-			
31 to 60 days	22,951,471,312	9,246,243	-	-			
61 to 90 days	1,950,010,137	912,812	-	-			
More than 91 days	405,671,233	-	-	-			
	32,051,792,543	15,472,290	-				

## Notes to Consolidated Financial Statements

	_	March 2015						
	_	Term bu	yer	Term se	eller			
	-	Colones	U.S. dollars	Colones	U.S. dollars			
Third parties	_	_						
1 to 30 days		4,830,822,272	1,729,153	5,858,980,824	5,062,285			
31 to 60 days		12,403,702,789	17,320,051	16,326,799,010	7,519,159			
61 to 90 days		2,389,258,080	22,312,451	95,645,747	9,323,093			
More than days	91	96,479,908	445,968	502,151,141	219,239			
•	-	19,720,263,049	41,807,623	22,783,576,722	22,123,776			
	¢	51,772,055,592	57,279,913	22,783,576,722	22,123,776			
	=							
	_		March	2014				
	_	Term bu	•	Term seller				
	_	Colones	U.S. dollars	Colones	U.S. dollars			
Own								
1 to 30 days	¢	7,539,079,779	6,894,707	-	-			
31 to 60 days		26,687,440,914	-	-	-			
61 to 90 days		118,000,110	3,179,985	-	-			
More than	91							
days	_	-	562,368					
	_	34,344,520,803	10,637,060					
Third parties								
1 to 30 days		2,909,092,737	133,038	5,765,789,467	558,390			
31 to 60 days		6,553,783,111	8,116,174	14,526,751,842	6,144,995			
61 to 90 days		135,984,503	12,215,876	160,851,637	10,742,212			
More than	91							
days	_		103,462		665,831			
	_	9,598,860,351	20,568,550	20,453,392,946	18,111,428			
	¢_	43,943,381,154	31,205,610	20,453,392,946	18,111,428			

In tri-party repurchase agreements and term operations, the Brokerage Firm is contingently liable for the short balance that arises when a security is sold for an amount that is less than the amount payable to the respective term seller. In accordance with the Regulations on Repurchase Agreements and the Regulations on Term Operations, all operations are backed by guarantees in order to cover any related contingencies.

Securities that back tri-party repurchase agreements are held in the custody of CEVAL or in foreign entities with which CEVAL has custody agreements.

## Notes to Consolidated Financial Statements

As of March 31, 2015 and 2014, the Brokerage Firm has no margin calls that require disclosure.

# (24) <u>Investment fund management agreements</u>

The Investment Fund Manager's memoranda accounts are as follows:

		March 2015				
	_			Value per		
Fund	_	Net value	Shares	share		
Funds in colones:						
Súper Fondo - colones	¢	61,980,016,913	17,229,113,695	3.597400192		
Fon Depósito - colones		76,928,776,644	57,300,674,101	1.342545753		
Crecí Fondo - colones		1,261,586,759	299,192,519	4.216638714		
Redí Fondo - colones		4,076,564,065	1,350,803,922	3.017879944		
Diner Fondo - colones	_	35,152,087,190	14,347,491,508	2.450051089		
Subtotal - colones	¢ _	179,399,031,571	90,527,275,745			
Funds in U.S. dollars:						
Súper Fondo - U.S. dollars	US\$	26,542,319	18,792,609	1.412380706		
Crecí Fondo - U.S. dollars		1,498,725	928,264	1.614545723		
Redí Fondo - U.S. dollars		7,198,149	5,276,413	1.364212486		
Diner Fondo - U.S. dollars		102,071,802	81,715,923	1.249105426		
Fon Depósito - U.S. dollars		64,024,320	60,571,689	1.057000746		
Súper Fondo Plus - U.S. dollars		77,994,876	76,788,210	1.015714212		
Fondo Hipotecario - U.S. dollars						
(mortgage fund)		529,065	525,486	596.4651184		
Subtotal - U.S. dollars	US\$	279,859,256	244,598,594			
Subtotal - U.S. dollars, expressed in	_					
colones	¢	147,586,577,279	128,991,514,532			
Funds in euros:	_					
Diner Fondo - euros	€	3,304,459	3,097,419	1.06684252		
Subtotal - euros	€	3,304,459	3,097,419			
Subtotal - euros, expressed in colones	¢	1,869,503,524	1,752,364,799			
Total assets of managed funds (note	- d	_	_			
22-a)	¢	328,855,112,374	221,271,155,076			
Guarantees:	_	_	_			
Performance bonds	¢	43,797,406				
Outstanding checks		1,610,398				
Total memoranda accounts (note 22-a)	¢	328,900,520,178				
	_					

## Notes to Consolidated Financial Statements

			March 2014	
				Value per
Fund		Net value	Shares	share
Funds in colones:				
Súper Fondo - colones	¢	25,061,165,053	7,266,957,210	3.448646294
Fon Depósito - colones		89,141,047,148	68,760,577,082	1.296397601
Crecí Fondo - colones		1,208,200,030	304,541,548	3.967274867
Redí Fondo - colones		3,073,968,282	1,081,954,123	2.841126271
Diner Fondo - colones		39,862,943,603	16,856,184,548	2.364885333
Subtotal - colones	¢	158,347,324,116	94,270,214,511	
Funds in U.S. dollars:	-	_		
Súper Fondo - U.S. dollars	US\$	38,246,332	27,383,335	1.396701007
Crecí Fondo - U.S. dollars		733,389	467,673	1.568164869
Redí Fondo - U.S. dollars		4,661,014	3,501,555	1.331126796
Diner Fondo - U.S. dollars		144,811,185	117,069,549	1.23696714
Fon Depósito - U.S. dollars		71,119,544	67,970,624	1.04632766
Súper Fondo Plus - U.S. dollars		7,661,757	7,649,237	1.001636712
Fondo Hipotecario - U.S. dollars	-	_		
(mortgage fund)	_	715,762	710,002	806.9462345
Subtotal - U.S. dollars	US\$	267,948,983	224,751,975	
Subtotal - U.S. dollars, expressed in	d			
colones	¢	144,247,655,185	120,992,978,222	
Funds in euros:				
Diner Fondo - euros	€	3,984,600	3,737,792	1.066030531
Subtotal - euros	€	3,984,600	3,737,792	
Subtotal - euros, expressed in colones	¢	2,960,195,959	2,776,840,064	
Total assets of managed funds (note 22-	<i>d</i>	_		
a)	¢	305,555,175,260	218,040,032,797	
Guarantees:				
Performance bonds	¢	42,734,155		
Outstanding checks	_	1,610,398		
Total memoranda accounts (note 22-a)	¢	305,599,519,813		

The main activity of the Investment Fund Manager is managing funds and securities in investment funds.

#### Notes to Consolidated Financial Statements

An investment fund is capital formed by contributions from individuals or legal entities for the purpose of investing such capital in securities or in other assets authorized by SUGEVAL, which is managed by a company dedicated to such activities on behalf of fund participants, who assume all related risks. Contributions are documented in share certificates. The objective of investment funds is to maximize goodwill on the invested amount by managing securities or other assets for which the respective return depends on changes in the fair value of the assets.

The Investment Fund Manager has registered the following funds with SUGEVAL:

- BN Súper Fondo Colones No Diversificado (non-diversified colones): This is an open-end (floating number of outstanding shares) money market fund with a variable income portfolio. Returns on the investment portfolio are not distributed until the customer requests partial or full redemption of shares.
- BN Crecí Fondo Colones No Diversificado (non-diversified colones): This is an open-end (floating number of outstanding shares) growth fund with a variable income portfolio. Returns on the investment portfolio are not distributed until the customer requests partial or full redemption of shares.
- BN Redí Fondo Mensual Colones No Diversificado (monthly, nondiversified - colones): This is an open-end (floating number of outstanding shares) income fund with a fixed income portfolio. Returns on the investment portfolio are not distributed until the customer requests partial or full redemption of shares.
- BN Diner Fondo Colones No Diversificado (non-diversified colones):
   This is an open-end (floating number of outstanding shares) money market fund with a fixed income portfolio. Returns on the investment portfolio are not distributed until the customer requests partial or full redemption of shares.
- BN Fon Depósito Colones No Diversificado (non-diversified colones):
   This is an open-end (floating number of outstanding shares) money market fund with a fixed income portfolio. Returns on the investment portfolio are not distributed until the customer requests partial or full redemption of shares.

#### Notes to Consolidated Financial Statements

- BN Súper Fondo Dólares Diversificado (diversified U.S. dollars): This is an open-end (floating number of outstanding shares) money market fund with a variable income portfolio. Returns on the investment portfolio are not distributed until the customer requests partial or full redemption of shares.
- BN Crecí Fondo Dólares No Diversificado (non-diversified U.S. dollars): This is an open-end (floating number of outstanding shares) growth fund with a variable income portfolio. Returns on the investment portfolio are not distributed until the customer requests partial or full redemption of shares.
- BN Redí Fondo Trimestral Dólares No Diversificado (quarterly, non-diversified U.S. dollars): This is an open-end (floating number of outstanding shares) income fund with a fixed income portfolio. Returns on the investment portfolio are not distributed until the customer requests partial or full redemption of shares.
- BN Diner Fondo Dólares No Diversificado (non-diversified U.S. dollars): This is an open-end (floating number of outstanding shares) money market fund with a fixed income portfolio. Returns on the investment portfolio are not distributed until the customer requests partial or full redemption of shares.
- BN Fon Depósito Dólares No Diversificado (non-diversified U.S. dollars): This is an open-end (floating number of outstanding shares) money market fund with a fixed income portfolio. Returns on the investment portfolio are not distributed until the customer requests partial or full redemption of shares.
- BN Fondo de Inversión de Titularización Hipotecaria Dólares (mortgage securitization U.S. dollars): This is mainly a closed-end mortgage investment fund, i.e. investor shares are listed and traded on a stock exchange.
- BN Diner Fondo Euros No Diversificado (non-diversified euros): This is an open-end (floating number of outstanding shares) money market fund with a fixed income portfolio. Returns on the investment portfolio are not distributed until the customer requests partial or full redemption of shares.

#### Notes to Consolidated Financial Statements

• BN Fondo de Desarrollo Inmobiliario CCRC - A (real estate development - U.S. dollars): This is a long-term, closed-end fund in U.S. dollars mainly dedicated to investing in real estate; however, a portion of its portfolio may be invested in securities. Returns are only distributed in the real estate operation phase on a quarterly basis. Payments are made within 10 days after quarter-end (cutoff dates of March 31, June 30, September 30, and December 31 of each year). The fund will distribute net returns after deducting expenses incurred, reserves, and the corresponding taxes. Returns are generated from the total or partial sale of the real estate development, including goodwill and negative goodwill derived from such sale, rental income from the leased property portfolio, and the returns on securities, less costs incurred in the real estate development works. Accordingly, returns are distributed if the financial statements of the fund present distributable profits.

Investment fund management is regulated by SUGEVAL and the Securities Market Regulatory Law.

## (25) Pension fund management agreements

The Pension Fund Manager's memoranda accounts are as follows:

	_	March 2015	March 2014
Mandatory Pension Fund	¢	721,304,198,465	616,120,612,524
Mandatory Retirement Savings Account		91,318,453,679	76,821,950,930
Pension Fund in Colones		41,853,338,869	37,788,369,003
Pension Fund in Colones B		8,022,025,144	6,347,077,986
Notary Fund		19,738,562,106	17,866,793,979
Pension Fund in U.S. dollars (a)		8,854,295,059	7,905,463,177
Pension Fund in U.S. dollars B (b)	_	6,390,292,267	5,381,018,556
Total assets of managed funds (note 22-a)		897,481,165,589	768,231,286,155
Securities and assets in own custody		7,123,925,757	6,426,463,665
Bid and performance bonds – colones		12,558,665	23,437,334
Bid and performance bonds – U.S. dollars (c)		26,174,459	12,352,793
Securities in DU		1,478,958,787	1,633,642,577
Total memoranda accounts (note 22-a)	¢	906,122,783,257	776,327,182,524

## Notes to Consolidated Financial Statements

- (a) As of March 31, 2015, this fund amounts to US\$16,789,850 and was valued at the exchange rate of ¢527.36 to US\$1.00 (March 2014: US\$14,684,889 valued at the exchange rate of ¢538.34 to US\$1.00).
- (b) As of March 31, 2015, this fund amounts to US\$12,117,514 and was valued at the exchange rate of  $\phi$ 527.36 to US\$1.00 (March 2014: US\$9,995,576 valued at the exchange rate of  $\phi$ 538.34 to US\$1.00).
- (c) As of December 31, 2014, this fund amounts to US\$49,633 and was valued at the exchange rate of  $\phi$ 527.36 to US\$1.00 (March 2014: US\$22,946 valued at the exchange rate of  $\phi$ 538.34 to US\$1.00).

# (26) <u>Finance income on cash and due from banks and investments in financial instruments</u>

Finance income on cash and due from banks and investments in financial instruments is as follows:

	_	March 2015	March 2014
Cash and due from banks:			
Deposits in BCCR	¢	9,836,638	13,915,090
Checking accounts and demand deposits in local entities		16,027,898	6,454,001
Checking accounts and demand deposits in foreign entities	_	62,789,576	52,558,058
	_	88,654,112	72,927,149
Financial instruments:	_		
Investments in available-for-sale securities		9,617,672,005	8,537,540,761
Investments in committed deposits and securities		2,089,300,441	2,533,340,842
Subtotal	_	11,706,972,446	11,070,881,603
Total	¢	11,795,626,558	11,143,808,752
	_		

## Notes to Consolidated Financial Statements

# (27) <u>Finance income on loan portfolio</u>

Finance income on the loan portfolio is as follows:

		March 2015	March 2014
Current loans:			
Checking account overdrafts	¢	24,373,966	26,970,090
Loans granted with funds from BCCR		379,238,697	437,156,655
Loans granted with other funds		63,051,609,807	55,363,087,643
Credit cards		4,937,907,544	4,147,119,089
Issued letters of credit		428,289	15,635
Other loans		1,155,856	810,415
Subtotal		68,394,714,159	59,975,159,527
Past due loans and loans in legal collections:			
Checking account overdrafts		368,531	539,482
Loans granted with funds from BCCR		74,947,204	67,354,549
Loans granted with other funds		11,268,684,975	10,173,841,175
Credit cards		685,835,731	596,964,725
Other		455,877	1,303,832
Subtotal		12,030,292,318	10,840,003,763
Total	¢	80,425,006,477	70,815,163,290

# (28) Other finance income

Other finance income is as follows:

	_	March 2015	March 2014
Fees and commissions on letters of credit	¢	8,094,750	31,908,192
Fees and commissions on guarantees granted			
		152,036,263	153,582,446
Fees and commissions on lines of credit		50,237,504	19,923,000
Gain on fair value hedge item measured at			
cost		8,644,371,074	2,861,055,945
Other sundry finance income	_	816,038,317	1,017,509,423
	¢	9,670,777,908	4,083,979,006
	¢	816,038,317	1,017,509,423

## Notes to Consolidated Financial Statements

## (29) Expenses for obligations with the public

Expenses for obligations with the public are as follows:

		March 2015	March 2014
Demand deposits	¢	8,922,170,383	8,108,538,040
Term deposits		18,890,137,097	15,680,660,992
Tri-party repurchase agreements and			
securities lending		511,459,434	506,847,631
Other term obligations with the public		680,913	
	¢	28,324,447,827	24,296,046,663

## (30) Expenses for allowances for impairment of assets

Expenses for allowances for impairment of assets are as follows:

	_	March 2015	March 2014
Allowance for loan impairment (note 6)	¢	8,027,117,639	3,873,426,365
General and counter-cyclical allowance			
for loan portfolio (note 6)		9,061,001	-
Allowance for impairment of other			
accounts receivable (note 7)		509,885,376	711,181,381
Allowance for stand-by credit losses			
(note 18)		116,000,005	694,930,436
General and counter-cyclical allowance			
for stand-by credit losses (note 18)		25,812,007	4,854,021
Allowance for impairment of			
derivative financial instruments			
(note 5-a)		33,565,545	71,624
	¢	8,721,441,573	5,284,463,827
	_		

# (31) <u>Income from recovery of assets and decreases in allowances and provisions</u>

Income from recovery of assets and decreases in allowances and provisions is as follows:

		March 2015	March 2014
Recovery of loan write-offs	¢	3,522,838,034	3,108,354,341
Recovery of receivables write-offs		423,979	105,843
Decrease in allowance for impairment of			
other accounts receivable (note 7)		36,160,680	91,659,427
	¢	3,559,422,693	3,200,119,611

## Notes to Consolidated Financial Statements

## (32) Operating income from service fees and commissions

Operating income from service fees and commissions is as follows:

		March 2015	March 2014
Drafts and transfers	¢	1,797,365,820	1,685,385,995
Certified checks		1,192,072	1,513,975
Trusts		206,342,185	209,419,395
Custodial services		330,915,537	224,051,439
Banking mandates		37,421	185,948
Collections		11,065,934	11,843,696
Credit cards		10,798,995,521	8,711,687,931
Management services		881,574,714	729,843,355
Management of investment funds		1,005,625,193	968,448,745
Management of pension funds		1,872,499,770	1,548,506,363
Insurance underwriting		881,938,130	811,755,591
Brokerage operations (third parties in local market)		573,233,429	452,157,881
Brokerage operations (third parties in other markets)		31,648,689	11,575,762
Individual portfolio management		317,896	1,580,157
Other		9,371,064,555	8,730,626,370
	¢	27,763,816,866	24,098,582,603

# (33) Other operating income

Other operating income is as follows:

		March 2015	March 2014
Leasing of assets	¢	15,016,863	3,191,067
Recovery of expenses		58,997,785	378,238,383
Net valuation of other assets (note 1-d-iii)		137,285,730	216,183,831
Other income from accounts receivable		1,060,671	1,066,389
Sundry operating income		954,980,232	1,469,544,575
Decrease in provisions		3,431,702,473	4,053,380
	¢	4,599,043,754	2,072,277,625

## Notes to Consolidated Financial Statements

# (34) Expenses for foreclosed assets

Expenses for foreclosed assets are as follows:

	March 2015	March 2014
Loss on sale of property and other assets acquired in lieu of payment	¢ 88,625,075	2,804,132,757
Loss on sale of assets awarded in judicial auctions	2,611,593,072	-
Management of assets acquired in lieu of payment	-	2,005,300,569
Management of assets awarded in judicial auctions	1,942,908,787	79,905,227
Loss on allowance for impairment of foreclosed assets and per legal requirements (note 8)	380,531,337	6,117,668,417
Loss on impairment of foreclosed assets (note 8)	5,547,478,685	-
Other expenses for foreclosed assets	21,313,511	295,808,694
	¢ 10,592,450,467	11,302,815,664

# (35) Expenses for provisions

Expenses for provisions are as follows:

	_	March 2015		March 2014
Severance benefits	¢	1,441,161,591	· <u></u>	2,060,688,041
Pending litigation		67,400,278		136,550,869
Other provisions		3,684,460,352		1,954,142,129
	¢	5,193,022,221		4,151,381,039

## Notes to Consolidated Financial Statements

# (36) Other operating expenses

Other operating expenses are as follows:

		March 2015	March 2014
Penalties for noncompliance with regulatory provisions	¢	44,341,414	9,853,618
Net valuation of other liabilities (note 1-d-iii)		37,323,294	854,285,824
Income tax (8%) on interest on investments in financial instruments		801,823,899	843,904,145
Property tax		39,329,619	52,539,498
Licenses		177,289,911	177,865,287
Other local taxes		76,002,377	188,328,854
Transfers to FINADE		773,755,435	416,658,514
Sundry operating expenses		11,774,894,919	10,696,132,941
	¢	13,724,760,868	13,239,568,681

# (37) <u>Personnel expenses</u>

Personnel expenses are as follows:

	March 2015	March 2014
Salaries and bonuses, permanent staff	¢ 12,799,041,090	14,033,842,496
Salaries and bonuses, contractors	501,575,994	576,541,853
Compensation for directors and statutory		
examiners	46,866,738	47,198,277
Overtime	254,018,613	309,739,628
Travel expenses	165,001,386	264,040,115
Statutory Christmas bonus	1,868,235,055	1,706,486,211
Vacation	1,841,478,702	1,650,157,207
Other compensation	1,647,756,395	1,941,336,821
Severance benefits	1,103,098,366	28,472,021
Employer social security taxes	7,132,076,930	7,649,438,697
Refreshments	99,833,128	174,623,762
Uniforms	13,961,659	3,141,072
Training	177,664,188	233,429,302
Employee insurance	63,209,345	69,079,567
Back-to-school bonus	1,632,157,543	1,473,480,499
Mandatory retirement savings account	693,516,227	625,073,867
Other personnel expenses	124,827,602	71,278,029
	¢ 30,164,318,961	30,857,359,424

## Notes to Consolidated Financial Statements

## (38) Other administrative expenses

Other administrative expenses are as follows:

	_	March 2015	March 2014
Outsourcing	¢	2,793,957,304	3,598,453,535
Transportation and communications		1,000,717,205	1,352,516,958
Infrastructure		7,306,762,835	8,001,469,769
Overhead	_	2,264,332,554	3,367,364,519
		13,365,769,89	16,319,804,781
	¢	8	10,319,604,761

## (39) Statutory allocations

Statutory allocations are as follows:

	_	March 2015	March 2014
CONAPE (5%)	¢	860,844,163	423,453,694
CNE (3%)		530,695,350	260,446,404
INFOCOOP (10%)		1,279,164,881	723,310,017
Public capital pension operators		180,965,265	-
RIVM (5%)		746,443,690	291,405,210
	¢	3,598,113,349	1,698,615,325

# (40) Fair value of financial instruments

Carrying amounts and fair values of all financial assets and liabilities that are not carried at fair value are compared in the following table:

		March 2015		
		Carrying amount	Fair value	
Financial assets:				
Cash and due from banks	¢	741,390,164,875	741,390,164,875	
Investments in financial instruments		1,163,983,551,451	1,163,983,551,451	
Loan portfolio		3,362,853,917,663	3,093,481,756,463	
	¢	5,268,227,633,989	4,998,855,472,789	
Financial liabilities:				
Demand deposits from the public and financial				
entities	¢	2,489,872,659,294	2,489,872,659,294	
Other demand obligations with the public		13,059,660,352	13,059,660,352	
Term deposits from the public and financial				
entities		2,309,765,989,665	2,313,758,481,883	
Obligations for tri-party repurchase agreements		39,984,152,088	39,984,152,088	

(Continued)

## Notes to Consolidated Financial Statements

		March 2014		
		Carrying amount	Fair value	
Financial assets:	•			
Cash and due from banks	¢	944,526,780,031	944,526,780,031	
Investments in financial	,			
instruments		895,278,244,080	895,278,244,079	
Loan portfolio		3,178,259,363,464	2,929,286,866,639	
	¢	5,018,064,387,575	4,769,091,890,749	
Financial liabilities:	· •	<u> </u>		
Demand deposits from the public				
and financial entities	¢	2,408,414,559,774	2,408,414,559,775	
Other demand obligations with the	,	, , , ,	, , , ,	
public		12,309,621,811	12,309,621,811	
Term deposits from the public and				
financial entities		2,167,719,619,783	2,175,476,398,618	
Obligations for tri-party repurchase				
agreements		39,892,329,298	39,892,329,297	
<del>-</del>	¢	4,628,336,130,666	4,636,092,909,501	

¢ 4,852,682,461,399

4,856,674,953,617

#### Fair value estimates

The following assumptions were used by management to estimate the fair value of each class of financial instruments, both on and off the balance sheet:

a. Cash and due from banks, accrued interest receivable, other receivables, demand deposits from the public, accrued interest payable, and other liabilities

The carrying amounts approximate fair value because of the short-term nature of these instruments.

## b. Investments in financial instruments

The fair values of available-for-sale investments in financial instruments are based on quoted market prices, except for Auction Rate Securities (ARS), which fair values are determined using the valuation method developed by the Bank.

## Notes to Consolidated Financial Statements

## c. Loan portfolio

The fair value of loans is calculated by discounting future cash flows expected for principal and interest. Loan payments are assumed to be made on the contractually agreed payment dates. Future expected cash flows for loans are discounted at the interest rates offered for similar loans to new borrowers as of March 31, 2015 and 2014.

## d. Term deposits

The fair value of term deposits is calculated by discounting cash flows at the interest rates offered for term deposits with similar maturities as of March 31, 2015 and 2014.

## e. Obligations with entities

The fair value of obligations with entities is calculated by discounting cash flows at the interest rates in effect as of March 31, 2015 and 2014.

Fair value estimates are made at a specific date, based on relevant market information and information concerning the financial instruments. These estimates do not reflect any premium or discount that could result from offering for sale a particular financial instrument at a given point in time. These estimates are subjective in nature and involve uncertainties and matters of significant judgment and, therefore, cannot be determined with precision. Estimates could vary significantly if changes are made to those assumptions.

As of March 31, 2014 and 2013, the following table analyzes financial instruments measured at fair value by the level in the fair value hierarchy:

		March 2015						
		Level 1	Level 2	Level 3	Total			
Available for sale	¢	927,426,437,773	182,815,292,841	5,627,570,800	1,115,869,301,414			
Held to maturity	¢	-	27,280,583,228		27,280,583,228			
		_						
		March 2014						
		Level 1	Level 2	Level 3	Total			
Available for sale	¢	804,130,026,850	58,731,523,177	5,734,048,717	868,595,598,744			
Held to maturity	¢.		26,281,271,297		26,281,271,297			

1 2017

## Notes to Consolidated Financial Statements

The table above sets out information about financial instruments measured at fair value using a valuation method. The fair value hierarchy is as follows:

- Level 1: quoted prices (unadjusted) in active markets for identical assets or liabilities.
- Level 2: inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices).
- Level 3: inputs for the asset or liability that are not based on observable market data (unobservable inputs).

Financial instruments categorized as Level 3 in the fair value hierarchy are measured as follows:

	_	March 31,		
		2015	2014	
Opening balance	¢	5,677,895,692	6,628,127,108	
Closing balance	¢	5,627,750,800	5,734,048,717	

## (41) <u>Vehicle operating leases</u>

As of March 31, 2015, vehicle lease agreements have expired and are settled through a purchase order. Additionally, extension requests and the new tender process are under review in accordance with the new guidelines from senior management to minimize the expense for vehicle lease agreements.

## (42) Segments

The Bank has defined its business segments based on the administrative and reporting structure, and on the structure of banking, stock brokerage, investment and pension fund management, and insurance brokerage services it provides. Undefined segments correspond mainly to the Bank and to leasing activities.

# Notes to Consolidated Financial Statements

# Profit or loss, assets, and liabilities of each segment are as follows:

	_				March	n 31, 2015			
				·		Insurance	·	·	
				Investment Fund	Pension Fund	Brokerage			
	_	Bank	Brokerage Firm	Manager	Manager	Firm	Total	Eliminations	Consolidated
ASSETS									
Cash and due from banks	¢	737,702,868,862	3,377,400,567	249,464,300	181,066,817	1,369,113,421	742,879,913,967	1,489,749,092	741,390,164,875
Investments in financial instruments		1,095,772,935,135	57,758,798,278	4,391,005,244	6,072,112,793	-	1,163,994,851,450	11,300,000	1,163,983,551,450
Loan portfolio, net		3,306,853,774,201	-	-	-	-	3,306,853,774,201	-	3,306,853,774,201
Accounts and fees and commissions receivable,									
net		1,972,646,943	128,911,088	96,252,698	871,877,210	201,284,486	3,270,972,425	46,666,240	3,224,306,185
Fees and commissions		108,754,736	24,894,591	11,909,109	632,113,122	143,405,534	921,077,092	27,155,003	893,922,089
Brokerage services		-	54,271,944	-	-	-	54,271,944	-	54,271,944
Transactions with related parties		51,430,581	8,991,589	9,656,212	5,127,897	1,062,400	76,268,679	19,511,237	56,757,442
Deferred tax and income tax		3,618,333,838	17,794,006	72,228,168	173,839,733	56,816,552	3,939,012,297	-	3,939,012,297
Other		3,922,839,298	22,958,958	2,459,209	60,796,458	-	4,009,053,923	_	4,009,053,923
Accrued interest		2,027,139	-	= '	<u>-</u>	-	2,027,139	-	2,027,139
Allowance for impairment of accounts and fees									
and commissions		(5,730,738,649)	-	-	-	-	(5,730,738,649)	-	(5,730,738,649)
Foreclosed assets, net		19,104,968,372	-	-	-	-	19,104,968,372	-	19,104,968,372
Investments in other companies		78,224,487,949	30,000,000	-	-	-	78,254,487,949	27,732,410,249	50,522,077,700
Property and equipment, net		171,832,163,479	524,965,857	148,675,563	365,101,867	22,569,401	172,893,476,167	-	172,893,476,167
Other assets		43,595,593,387	350,470,077	343,468,630	248,237,324	182,143,944	44,719,913,362	-	44,719,913,362
TOTAL ASSETS	¢	5,455,059,438,328	62,170,545,867	5,228,866,435	7,738,396,011	1,775,111,252	5,531,972,357,893	29,280,125,581	5,502,692,232,312
LIABILITIES AND EQUITY	_								
LIABILITIES									
Obligations with the public	¢	3,613,680,215,038	40,090,434,793	-	-	-	3,653,770,649,831	11,300,000	3,653,759,349,831
Obligations with BCCR		171,605,579	-	-	-	-	171,605,579	-	171,605,579
Obligations with entities		1,141,080,020,882	5,104,461,668	-	-	-	1,146,184,482,550	1,489,749,092	1,144,694,733,458
Demand		254,928,340,309	-	-	-	-	254,928,340,309	1,489,749,092	253,438,591,217
Term		871,181,322,656	5,100,000,000	-	-	-	876,281,322,656	-	876,281,322,656
Finance charges payable		14,970,357,917	4,461,668	-	-	-	14,974,819,585	-	14,974,819,585
Accounts payable and provisions		91,582,717,582	1,739,287,151	599,089,824	1,263,780,814	383,455,060	95,568,330,431	46,666,234	95,521,664,197
Other liabilities		30,218,143,639	-	-	-	-	30,218,143,639	-	30,218,143,639
Subordinated obligations	_	69,031,612,194	-	-	-	-	69,031,612,194	-	69,031,612,194
TOTAL LIABILITIES	¢ _	4,945,764,314,914	46,934,183,612	599,089,824	1,263,780,814	383,455,060	4,994,944,824,224	1,547,715,326	4,993,397,108,898

					March 3	31, 2015			
						Insurance			
				Investment Fund	Pension Fund	Brokerage			
		Bank	Brokerage Firm	Manager	Manager	Firm	Total	Eliminations	Consolidated
EQUITY									
Share capital	¢	118,130,303,482	6,600,000,000	1,500,000,000	3,694,356,509	369,700,000	130,294,359,991	12,164,056,509	118,130,303,482
Non-capitalized capital contributions		-	-	-	1,300,568,500	-	1,300,568,500	1,300,568,500	-
Equity adjustments		68,392,156,211	93,636,865	(5,283,851)	17,382,669	-	68,497,891,894	105,735,683	68,392,156,211
Capital reserves		248,809,086,655	1,010,943,805	300,000,000	300,000,000	73,940,000	250,493,970,460	1,684,883,805	248,809,086,655
Prior period retained earnings		45,050,532,421	7,133,530,238	2,651,175,152	981,342,254	862,068,579	56,678,648,644	11,628,116,223	45,050,532,421
Income for the year		10,766,969,405	398,251,347	183,885,310	180,965,265	85,947,613	11,616,018,940	849,049,535	10,766,969,405
FOFIDE		18,146,075,240	-	-	-	-	18,146,075,240	-	18,146,075,240
TOTAL EQUITY	¢	509,295,123,414	15,236,362,255	4,629,776,611	6,474,615,197	1,391,656,192	537,027,533,669	27,732,410,255	509,295,123,414
TOTAL LIABILITIES AND EQUITY	¢	5,455,059,438,328	62,170,545,867	5,228,866,435	7,738,396,011	1,775,111,252	5,531,972,357,893	29,280,125,581	5,502,692,232,312
Debit memoranda accounts	¢	514,103,608,208	=	-	265,110,324	-	514,368,718,532	-	514,368,718,532
Trust assets	¢	996,507,819,918	1,695,619,099	-	-	-	998,203,439,017	-	998,203,439,017
Trust liabilities	¢	72,368,698,386	426,371	-	-	-	72,369,124,757	-	72,369,124,757
Trust equity	¢	924,139,121,532	1,695,192,727	-	-	-	925,834,314,259	-	925,834,314,259
Other debit memoranda accounts	¢	15,273,461,074,454	1,550,124,732,369	328,900,520,178	906,122,783,257	-	18,058,609,110,258	-	18,058,609,110,258

3.4	1	2 1	1 20	۱ 1	-
IVI2	arcn	- 1 I	1. 20	"	_

					march 51,	2013			
				Investment	Pension Fund	Insurance Brokerage			
		Bank	Brokerage Firm	Fund Manager	Manager	Firm	Total	Eliminations	Consolidated
Finance income	¢	138,783,890,875	1,284,760,666	89,864,732	132,041,715	14,110,839	140,304,668,827	3,728,645	140,300,940,182
Finance expense		83,868,821,201	707,242,541	11,387,600	6,894,774	772,392	84,595,118,508	3,728,645	84,591,389,863
Allowance expense		8,721,441,573	-	-	-	-	8,721,441,573	-	8,721,441,573
Income from recovery of assets		3,559,422,693	-	-	-	-	3,559,422,693	-	3,559,422,693
FINANCE INCOME		49,753,050,794	577,518,125	78,477,132	125,146,941	13,338,447	50,547,531,439	-	50,547,531,439
Other operating income		42,181,085,159	905,626,040	1,014,947,922	1,878,313,771	508,975,516	46,488,948,408	1,113,468,541	45,375,479,867
Other operating expenses		34,263,397,631	172,105,567	180,509,343	285,675,105	31,368,934	34,933,056,580	229,979,122	34,703,077,458
GROSS OPERATING INCOME		57,670,738,322	1,311,038,598	912,915,711	1,717,785,607	490,945,029	62,103,423,267	883,489,419	61,219,933,848
Personnel expenses		27,802,598,023	696,548,458	484,903,285	857,646,886	322,622,309	30,164,318,961	-	30,164,318,961
Other administrative expenses		12,651,257,042	206,496,369	159,344,419	335,736,432	47,375,520	13,400,209,782	34,439,884	13,365,769,898
Total administrative expenses		40,453,855,065	903,044,827	644,247,704	1,193,383,318	369,997,829	43,564,528,743	34,439,884	43,530,088,859
NET OPERATING INCOME BEFORE									
STATUTORY ALLOCATIONS AND TAXES		17,216,883,257	407,993,771	268,668,007	524,402,289	120,947,200	18,538,894,524	849,049,535	17,689,844,989
Income tax		3,072,426,106	-	91,619,332	167,021,776	38,330,099	3,369,397,313	-	3,369,397,313
Decrease in income tax		-	2,497,389	14,896,674	20,282,086	6,958,929	44,635,078	-	44,635,078
Statutory allocations		3,377,487,746	12,239,813	8,060,039	196,697,334	3,628,417	3,598,113,349	-	3,598,113,349
INCOME FOR THE YEAR	¢	10,766,969,405	398,251,347	183,885,310	180,965,265	85,947,613	11,616,018,940	849,049,535	10,766,969,405

	_				March	31, 2014			
				- <del></del>	·	Insurance			
				Investment Fund	Pension Fund	Brokerage			
	_	Bank	Brokerage Firm	Manager	Manager	Firm	Total	Eliminations	Consolidated
ASSETS									
Cash and due from banks	¢	940,447,739,172	6,330,082,138	287,476,619	275,021,623	769,476,816	948,109,796,368	3,583,016,337	944,526,780,031
Investments in financial instruments		831,948,316,772	53,810,593,194	3,894,259,219	5,907,862,449	-	895,561,031,634	282,787,554	895,278,244,080
Loan portfolio, net		3,132,520,642,840	-	-	-	-	3,132,520,642,840	-	3,132,520,642,840
Accounts and fees and commissions receivable,		<b>5.055.50</b>	455 455 000	25.405.552	<b>7.</b> 10. <b>522</b> 0.10	212 221 212	0.540.505.054	4 454 440 000	4 000 005 055
net		7,377,724,816	177,657,833	26,406,663	748,623,840	213,324,212	8,543,737,364	4,454,440,089	4,089,297,275
Fees and commissions		104,387,065	27,309,872	10,810,685	513,717,071	168,621,229	824,845,922	79,660,574	745,185,348
Brokerage services		-	27,138,808	-	-	-	27,138,808	-	27,138,808
Transactions with related parties		4,684,486,163	10,290	6,924,093	6,382,243	45,027	4,697,847,816	4,374,779,515	323,068,301
Deferred tax and income tax		2,870,961,559	118,458,547	8,593,231	166,546,235	43,585,865	3,208,145,437	-	3,208,145,437
Other		2,531,395,965	4,740,316	78,654	61,978,291	1,072,091	2,599,265,317	-	2,599,265,317
Accrued interest		1,698,456	-	-	-	-	1,698,456	-	1,698,456
Allowance for impairment of accounts and fees									
and commissions		(2,815,204,392)	-	-	-	-	(2,815,204,392)	-	(2,815,204,392)
Foreclosed assets, net		18,333,929,633	-	-	-	-	18,333,929,633	-	18,333,929,633
Investments in other companies		71,201,097,453	30,000,000	-	-	-	71,231,097,453	24,858,209,329	46,372,888,124
Property and equipment, net		163,795,550,420	481,112,236	128,321,116	455,779,801	17,174,027	164,877,937,600	-	164,877,937,600
Other assets	_	38,505,420,121	180,959,419	270,111,209	111,793,509	85,370,551	39,153,654,809	-	39,153,654,809
TOTAL ASSETS	¢	5,204,130,421,227	61,010,404,820	4,606,574,826	7,499,081,222	1,085,345,606	5,278,331,827,701	33,178,453,309	5,245,153,374,392
LIABILITIES AND EQUITY									
LIABILITIES									
Obligations with the public	¢	3,494,385,258,909	39,977,967,324	-	-	-	3,534,363,226,233	282,787,554	3,534,080,438,679
Obligations with BCCR		22,196,355,699	-	-	-	-	22,196,355,699	-	22,196,355,699
Obligations with entities		1,090,365,931,000	-	-	-	-	1,090,365,931,000	3,583,016,337	1,086,782,914,663
Demand		233,818,661,129	-	-	-	-	233,818,661,129	3,583,016,337	230,235,644,792
Term		841,826,636,141	-	-	-	-	841,826,636,141	-	841,826,636,141
Finance charges payable		14,720,633,730	-	-	-	-	14,720,633,730	-	14,720,633,730
Accounts payable and provisions		98,759,218,932	6,926,655,748	814,316,141	1,355,971,751	268,286,176	108,124,448,748	4,454,440,089	103,670,008,659
Other liabilities	_	36,464,272,861	-	-	-	-	36,464,272,861	-	36,464,272,861
TOTAL LIABILITIES	¢ _	4,742,171,037,401	46,904,623,072	814,316,141	1,355,971,751	268,286,176	4,791,514,234,541	8,320,243,980	4,783,193,990,561

	_				March 3	31, 2014			
						Insurance			
		D1-	D1 Ei	Investment Fund	Pension Fund	Brokerage	T-4-1	F1::	C1: 1-4-4
	-	Bank	Brokerage Firm	Manager	Manager	Firm	Total	Eliminations	Consolidated
EQUITY									
Share capital	¢	118,130,303,482	6,600,000,000	1,500,000,000	4,501,457,969	369,700,000	131,101,461,451	12,971,157,969	118,130,303,482
Non-capitalized capital contributions		-	-	-	493,467,040	-	493,467,040	493,467,040	-
Equity adjustments		64,857,877,088	(210,587,883)	(14,798,437)	23,019,004	-	64,655,509,772	(202, 367, 316)	64,857,877,088
Capital reserves		209,058,123,505	978,689,215	300,000,000	300,000,000	50,242,478	210,687,055,198	1,628,931,693	209,058,123,505
Prior period retained earnings		49,146,520,984	6,520,693,031	1,810,603,768	600,506,483	353,530,710	58,431,854,976	9,285,333,992	49,146,520,984
Income for the year		6,218,384,941	216,987,385	196,453,354	224,658,975	43,586,242	6,900,070,897	681,685,951	6,218,384,946
FOFIDE	_	14,548,173,826	-	-	-	-	14,548,173,826	-	14,548,173,826
TOTAL EQUITY	¢	461,959,383,826	14,105,781,748	3,792,258,685	6,143,109,471	817,059,430	486,817,593,160	24,858,209,329	461,959,383,831
TOTAL LIABILITIES AND EQUITY	¢	5,204,130,421,227	61,010,404,820	4,606,574,826	7,499,081,222	1,085,345,606	5,278,331,827,701	33,178,453,309	5,245,153,374,392
	_								
Debit memoranda accounts	¢								
Trust assets	¢	502,994,464,502	-	226,745	10,766,800	-	503,005,458,047	-	503,005,458,047
Trust liabilities	¢	962,621,119,067	427,383,636	-	-	-	963,048,502,703	-	963,048,502,703
Trust equity	¢	69,249,457,754	496,026	-	-	-	69,249,953,780	-	69,249,953,780
Other debit memoranda accounts	¢ -	893.371.661.313	426.887.611	_	_	_	893.798.548.924	_	893.798.548.924

M	rch	21	20	11/1

	_				March 31,	2011			
	_			Investment	Pension Fund	Insurance Brokerage			
		Bank	Brokerage Firm	Fund Manager	Manager	Firm	Total	Eliminations	Consolidated
Finance income	¢	272,054,692,654	1,653,685,865	110,400,108	154,371,470	9,603,747	273,982,753,844	9,031,245	273,973,722,599
Finance expense		225,074,677,042	1,126,811,048	20,284,401	12,970,441	2,308,071	226,237,051,003	9,031,245	226,228,019,758
Allowance expense		5,284,463,827	-	-	-	-	5,284,463,827	-	5,284,463,827
Income from recovery of assets	_	3,200,119,611	-	-	-	-	3,200,119,611	-	3,200,119,611
FINANCE INCOME		44,895,671,396	526,874,817	90,115,707	141,401,029	7,295,676	45,661,358,625	-	45,661,358,625
Other operating income		38,036,880,860	722,290,967	974,678,458	1,560,238,349	376,438,548	41,670,527,182	913,202,744	40,757,324,438
Other operating expenses	_	30,121,216,695	144,349,163	180,804,024	230,977,441	23,340,765	30,700,688,088	147,147,543	30,553,540,545
GROSS OPERATING INCOME		52,811,335,561	1,104,816,621	883,990,141	1,470,661,937	360,393,459	56,631,197,719	766,055,201	55,865,142,518
Personnel expenses		28,710,494,824	650,570,479	433,399,350	799,382,104	263,512,667	30,857,359,424	-	30,857,359,424
Other administrative expenses	_	15,631,766,855	230,547,808	147,037,681	351,434,399	43,387,287	16,404,174,030	84,369,249	16,319,804,781
Total administrative expenses	_	44,342,261,679	881,118,287	580,437,031	1,150,816,503	306,899,954	47,261,533,454	84,369,249	47,177,164,205
NET OPERATING INCOME BEFORE									
STATUTORY ALLOCATIONS AND TAXES		8,469,073,882	223,698,334	303,553,110	319,845,434	53,493,505	9,369,664,265	681,685,952	8,687,978,313
Income tax		578,898,382	-	97,993,166	104,730,442	15,958,355	797,580,345	-	797,580,345
Decrease in income tax		-	-	-	19,139,345	7,462,952	26,602,297	-	26,602,297
Statutory allocations	_	1,671,790,559	6,710,950	9,106,593	9,595,363	1,411,860	1,698,615,325	-	1,698,615,325
INCOME FOR THE YEAR	¢	6,218,384,941	216,987,384	196,453,351	224,658,974	43,586,242	6,900,070,892	681,685,952	6,218,384,940

### Notes to Consolidated Financial Statements

## (43) Risk management

The Bank has exposure to the following risks from financial instruments:

- credit risk
- liquidity risk
- market risks
  - o interest rate risk
  - o currency risk and
- operational risk.

The Corporate Risk Division is responsible for identifying and measuring credit, market, liquidity, and operational risks. For such purposes, all types of risks to which the Bank is exposed are monitored by that Division on an ongoing basis using a mapping procedure to classify risks based on their severity or impact and their frequency or probability of occurrence.

Policies and procedures for managing market and liquidity risks are also being formalized in specific manuals for each type of risk that describe the methodologies used to manage those risks. This activity has been extended to the Bank's subsidiaries, i.e. Brokerage Firm, Investment Fund Manager, Pension Fund Manager, and Insurance Brokerage Firm.

The Bank manages the above risks as follows:

## *a) Credit risk*

This is the risk that the borrower or issuer of a financial asset will fail to discharge an obligation, fully and on time, in accordance with the terms and conditions agreed upon at the time the financial asset was acquired. Credit risk is mainly related to the loan portfolio and investments in financial instruments. The exposure to credit risk on those assets is represented by the carrying amount of the assets in the consolidated balance sheet.

The Bank also has exposure to credit risk for off-balance sheet credits, such as commitments, letters of credit, sureties, and guarantees.

The Bank monitors credit risk on an ongoing basis through reports on portfolio status and classification. Credit analyses include periodic assessments of the financial position of customers, an analysis of the country's economic, political, and financial environment, and the potential impact on each sector. For such purposes, a thorough understanding is obtained of customers on an individual basis and their capacity to generate cash flows that enable them to honor their debt commitments.

### Notes to Consolidated Financial Statements

The Bank has established the following credit risk management procedures:

- 1. The Bank has defined procedures for loan follow-up and processing as well as for the application of loan controls. The functions, tasks, and procedures performed by the Credit Risk Division have been documented with the support of the Quality Management Division. As a result, the Bank has been able to unify, standardize, and improve the process.
- 2. The Bank has performed and reviewed the administrative loan follow-up procedures for branches and regional offices.
- 3. The Bank is comprehensively evaluating the Loan Process and, based on that evaluation, the procedures performed through offices, business development centers (BDCs), shared service centers, trade zones, and corporate centers in accordance with the organizational structure project named "Transformation."
- 4. The work plan for loan follow-up includes an evaluation of main borrowers (higher balances in the loan portfolio), which involves continuous monitoring and visits to regional offices.

At the date of the consolidated balance sheet, there are no significant concentrations of credit risk. The maximum exposure to credit risk is represented by the carrying amount of each financial asset.

# Notes to Consolidated Financial Statements

The Bank's financial instruments with credit risk exposure are as follows:

		Dir	ect		Star	id-by
	<u>Note</u>	March 2015	March 2014	Note	March 2015	March 2014
Loan portfolio						
Principal	6-a	¢ 3,339,599,235,594	3,158,435,830,904	20	250,650,771,616	243,922,225,791
Accounts and accrued interest						
receivable		23,254,682,069	19,823,532,560			
Carrying amount, gross		3,362,853,917,663	3,178,259,363,464		250,650,771,616	243,922,225,791
Allowance for loan impairment		(5,6,000,1,42,4,62)	(45.720.720.624)		(1.447.500.221)	(004 (00 011)
(accounting records)		(56,000,143,462)	(45,738,720,624)		(1,447,588,321)	(884,608,211)
Carrying amount, net		¢ 3,306,853,774,201	3,132,520,642,840		249,203,183,295	243,037,617,580
Loan portfolio						
Total balances:						
A1		¢ 2,594,648,331,723	2,476,474,091,002		241,159,993,300	235.314.421.947
A2		31,595,441,329	27,963,742,652		398,489,198	318.269.146
B1		345,747,387,244	319,854,320,776		4,702,935,959	4.018.580.263
B2		15,733,120,077	12,854,276,327		106,556,434	23.936.315
C1		112,411,319,839	76,912,478,541		2,185,439,069	1.988.140.523
C2		6,399,001,441	5,496,673,222		16,511,035	19.135.069
D		103,735,190,393	118,344,221,363		706,289,117	1.135.983.133
E		152,584,125,617	140,359,559,581		1,374,557,504	1.103.759.395
		3,362,853917,663	3,178,259,363,464		250,650,771,616	243.922.225.791
Structural allowance (subledger -					•	
database)		(53,424,833,817)	(43,043,933,013)		(969,159,442)	(868,554,953)
Carrying amount, net		¢ 3,309,429,083,846	3,135,215,430,451		249,681,612,174	243,053,670,838

		Di	rect	Stand	l-by
	N	March 2015	March 2014	March 2015	March 2014
Individually assessed loans with					
allowance:					
A1	¢ 2,59	4,648,331,723	2,476,474,091,002	237,442,728,926	231,850,968,629
A2	3	1,595,441,329	27,963,742,652	392,117,548	318,269,146
B1	34	5,747,387,244	319,854,320,776	4,654,262,920	3,901,033,488
B2	1	5,733,120,077	12,854,276,327	106,556,434	22,874,040
C1	11	2,411,319,839	76,912,478,541	2,185,439,069	1,951,855,932
C2		6,399,001,441	5,496,673,222	16,511,035	19,135,069
D	10	3,735,190,393	118,344,221,363	703,789,117	1,127,128,356
E	15	2,584,125,617	140,359,559,581	1,369,305,625	1,101,706,974
	3,36	2,853,917,663	3,178,259,363,464	246,870,710,674	240,292,971,634
Structural allowance (subledger –	•				, , ,
database)	(53	3.424.833.817)	(43,043,933,013)	(969,159,442)	(868,554,953)
Carrying amount, net	¢ 3,30	9,429,083,846	3,135,215,430,451	245,901,551,232	239,424,416,681
Past due loans without allowance:					<del></del>
A1	¢	-	-	-	-
A2		-	-	-	-
B1		-	-	-	-
B2		-	-	-	-
C1		-	-	-	-
C2		-	-	-	-
D		-	-	-	-
E		-	-	-	-
Carrying amount	¢	-		-	

-111-

		Dir	ect	Stand	l-by
		March 2015	March 2014	March 2015	March 2014
Aging of loan portfolio					
1-30  days	¢	-	-	-	-
31 – 60 days		-	-	-	-
61 – 90 days		-	-	-	-
91 – 180 days		-	-	-	-
More than 180 days		-	-	-	-
Carrying amount	¢	-	-	-	-
Current loans without allowance:					
A1	¢	-	-	3,717,264,374	3.463.453.315
A2		-	-	6,371,650	-
B1		-	-	48,673,039	117.546.776
B2		-	-	-	1.062.275
C1		-	-	-	36.284.591
C2		-	-	-	-
D		-	-	2,500,000	8.854.778
E		-	<u> </u>	5,251,879	2.052.422
Carrying amount	¢	-	<u>-</u>	3,780,060,942	3.629.254.157
Carrying amount, gross		3,362,853,917,663	3,178,259,363,464	250,650,771,616	243,922,225,791
Allowance for loan impairment (database)		(53,424,833,817)	(43,043,933,013)	(969,159,442)	(868,554,953)
(Excess) insufficiency of allowance over structural allowance		(2,575,309,645)	(2,694,787,611)	(478,428,879)	(16,053,258)
Carrying amount, net	¢	3,306,853,774,201	3,132,520,642,840	249,203,183,295	243,037,617,580
Restructured loans	¢	26,667,468,916	29,985,071,069	11,172,071	7,033,221

### Notes to Consolidated Financial Statements

As of March 31, 2015, no information is available for past due and current loans without allowance because an allowance has been established for the whole loan portfolio pursuant to CONASSIF Directive No. 1058/07 dated August 21, 2013, which became effective on January 1, 2014.

Set out below is an analysis of the gross and net (of allowance for loan impairment) amounts of loans by risk rating according to SUGEF Directive 1-05:

		March	2015
		Loans to d	customers
		Gross	Net
A1	¢	2,594,648,331,723	2,589,218,764,489
A2		31,595,441,329	31,560,677,130
B1		345,747,387,244	344,138,627,301
B2		15,733,120,077	15,619,596,186
C1		112,411,319,839	110,668,300,033
C2		6,399,001,441	6,124,898,597
D		103,735,190,393	96,623,249,691
E		152,584,125,617	112,899,660,774
	¢	3,362,853,917,663	3,306,853,774,201
		March	2014
		March Loans to c	
A1	¢	Loans to c	customers
A1 A2	¢	Loans to c	eustomers Net
	¢	Loans to c Gross 2,476,474,091,002	Net 2,474,102,883,601
A2	¢	Gross 2,476,474,091,002 27,963,742,652	Net 2,474,102,883,601 27,958,117,826
A2 B1	¢	Loans to c Gross 2,476,474,091,002 27,963,742,652 319,854,320,776	Net 2,474,102,883,601 27,958,117,826 318,556,420,316
A2 B1 B2	¢	Loans to constant of Gross  2,476,474,091,002  27,963,742,652  319,854,320,776  12,854,276,327	Net 2,474,102,883,601 27,958,117,826 318,556,420,316 12,734,361,720
A2 B1 B2 C1	¢	Loans to c Gross 2,476,474,091,002 27,963,742,652 319,854,320,776 12,854,276,327 76,912,478,541	Net 2,474,102,883,601 27,958,117,826 318,556,420,316 12,734,361,720 75,591,571,929
A2 B1 B2 C1 C2	¢	Loans to constant of Gross  2,476,474,091,002 27,963,742,652 319,854,320,776 12,854,276,327 76,912,478,541 5,496,673,222	Net  2,474,102,883,601 27,958,117,826 318,556,420,316 12,734,361,720 75,591,571,929 5,204,454,366

As shown above, as of March 31, 2015, the gross portfolio amounts to ¢3,362 billion. Of that amount, 88.84% is classified in risk ratings "A + B" and 11.16% in risk ratings "C+ D+ E" (2014: ¢3,178 billion, of which 89.27% is classified in risk ratings "A + B" and 10.73% in risk ratings "C+ D+ E").

### Notes to Consolidated Financial Statements

## Individually assessed loans with allowance:

Pursuant to SUGEF Directive 1-05, a risk rating is assigned to all borrowers. Applicable allowance percentages are determined based on that risk rating. Individually assessed loans with allowance are loan operations that after considering the guarantee for the loan, there is still a balance to which the applicable allowance percentage will be applied.

### Past due loans without allowance:

Past due loans without allowance correspond to loan operations with a guarantee for at least the outstanding balance due to the Bank. Accordingly, no allowance is established.

## Restructured loans:

Restructured loans are those for which the Bank has changed the original contractual terms due to deterioration in the borrower's financial position and where the Bank has made concessions that it would not otherwise consider. Once the loan is restructured, it remains in this category regardless of improvement in the borrower's position after restructuring. Following are the various types of restructured loans.

- a. Extended loan: Loan operation in which at least one full or partial payment of principal or interest due under the current contractual terms has been postponed.
- b. Modified loan: Loan operation in which at least one of the current contractual repayment terms has been modified, excluding extensions, additional payments not included in the loan repayment schedule, additional payments to reduce the amount of installments, and a change in the currency used while respecting the original loan maturity date.
- c. Refinanced loan: Loan operation in which at least one payment of principal or interest is made fully or partially with another loan operation extended to the borrower or to an individual from its economic interest group by the same financial intermediary or any other company of the same financial group or conglomerate. In the event of full settlement of the loan, the new loan operation is considered to be refinanced. In the event of partial settlement, both the new and existing loan operations are considered to be refinanced.

### Notes to Consolidated Financial Statements

### Restructured loans are as follows:

		Dire	ect	Stand-by		
		March 2015	March 2014	March 2015	March 2014	
Restructured loans	¢	26,667,468,916	29,985,071,069	11,172,071	7,033,221	

## <u>Loan charge-off policy:</u>

The Bank charges off a loan (and any allowance for loan impairment) when it determines the loan to be uncollectible based on an analysis of significant changes in the financial conditions of the borrower preventing compliance with the payment obligation, or when it determines that the guarantee is insufficient to cover the entire amount of the loan facility. For standard loans with smaller balances, charge-offs are generally based on the level of arrears of the loan granted.

# Risk ratings

The loan portfolio by borrower classification is as follows:

		Dir	rect	Stand	d-by
Borrower					
classification		March 2015	March 2014	March 2015	March 2014
Group 1	¢	1,890,548,777,631	1,766,459,313,874	55,019,853,925	58,374,439,368
Group 2		1,472,305,140,032	1,411,800,049,590	195,630,917,691	185,547,786,423
	¢	3,362,853,917,663	3,178,259,363,464	250,650,771,616	243,922,225,791

The Bank individually classifies its borrowers in one of eight risk ratings, identified as A1, A2, B1, B2, C1, C2, D, and E, with rating A1 as the lowest credit risk and rating E as the highest credit risk.

## Borrower classification

Analysis of creditworthiness

The Bank must define effective mechanisms to determine the creditworthiness of borrowers in Group 1. Based on whether the borrowers are individuals or legal entities, those mechanisms should permit an assessment of the following aspects:

### Notes to Consolidated Financial Statements

- a. *Financial position and expected cash flows*: Analysis of the stability and continuity of main sources of income. The effectiveness of the analysis depends on the quality and timeliness of information.
- b. Experience in the line of business and quality of management: Analysis of the capacity of management to lead the business with appropriate controls and adequate support from the owners.
- c. *Business environment*: Analysis of the main sector variables that affect the borrower's creditworthiness.
- d. *Vulnerability to changes in interest rates and foreign exchange rates*: Analysis of the borrower's ability to confront unexpected adverse changes in interest rates and foreign exchange rates.
- e. *Other factors:* Analysis of other factors that affect the borrower's creditworthiness. In the case of legal entities, considerations include, but are not limited to, environmental issues, technological aspects, operating licenses and permits, representation of products or foreign offices, relationship with significant customers and suppliers, sales agreements, legal risks, and country risk (the latter for foreign-domiciled borrowers). In the case of individuals, the following borrower characteristics may be taken into consideration: marital status, age, level of education, profession, gender, etc.

When a borrower has been assigned a risk rating by a rating agency, that rating should be an additional consideration when assessing the borrower's creditworthiness.

The Bank must classify the borrower's creditworthiness into one of four levels: level 1 - has the ability to pay; level 2 - has minor weaknesses in the ability to pay; level 3 - has serious weaknesses in the ability to pay; and level 4 - has no ability to pay. For purposes of this classification, the borrower and co-borrower(s) must be assessed jointly. Joint classification of creditworthiness may only be used to determine the allowance percentage for operations in which the parties are borrower and co-borrower.

Analysis of historical payment behavior

The Bank must determine a borrower's historical payment behavior based on the level assigned to the borrower by SUGEF's Credit Information Center (CIC).

#### Notes to Consolidated Financial Statements

The Bank must classify historical payment behavior into one of three levels: level 1 - good historical payment behavior; level 2 - acceptable historical payment behavior; and level 3 - poor historical payment behavior.

			Dir	ect	Stan	d-by
Risk rating	Arrears		March 2015	March 2014	March 2015	March 2014
A1	30 days or less	¢	2,594,648,331,723	2,476,474,091,002	241,159,993,300	235,314,421,947
A2	60 days or less		31,595,441,329	27,963,742,652	398,489,198	318,269,146
B1	60 days or less		345,747,387,244	319,854,320,776	4,702,935,959	4,018,580,263
B2	60 days or less		15,733,120,077	12,854,276,327	106,556,434	23,936,315
C1	90 days or less		112,411,319,839	76,912,478,541	2,185,439,069	1,988,140,523
C2	90 days or less		6,399,001,441	5,496,673,222	16,511,035	19,135,069
D	120 days or less		103,735,190,393	118,344,221,363	706,289,117	1,135,983,133
	More than 120					
E	days or other					
	factors		152,584,125,617	140,359,559,581	1,374,557,504	1,103,759,395
		¢	3,362,853,917,663	3,178,259,363,464	250,650,771,616	243,922,225,791

D:----

Pursuant to SUGEF Directive 1-05, borrowers are classified in two groups: Group 1, borrowers whose total outstanding balance exceeds \$\psi 65,000,000\$; and Group 2, borrowers whose total outstanding balance is less than \$\psi 65,000,000\$.

## **Borrower classification**

Until December 31, 2013, for purposes of borrower classification, pursuant to SUGEF Directive 1-05, borrowers in Group 1 were to be classified based on arrears, historical payment behavior, and creditworthiness; whereas, pursuant to the Bank's internal policies and based on the credit web, borrowers in Group 2 were to be classified based on arrears and historical payment behavior. Starting January 1, 2014, borrowers are classified in Group 1 and Group 2 based on arrears, historical payment behavior, and creditworthiness.

In all cases, borrowers without valid authorization for a credit check through SUGEF's CIC cannot be classified in risk categories A1 to B2.

Likewise, borrowers with at least one loan operation purchased from a financial intermediary domiciled in Costa Rica and regulated by SUGEF must be classified for at least one month in the rating of higher risk between the rating assigned by the selling bank and the rating assigned by the buying bank at the time of the purchase.

#### Notes to Consolidated Financial Statements

# Structural allowance for loan impairment

From January 2014, the allowances for loan impairment are as follows:

- ✓ General allowance for total outstanding balances, not considering the corresponding guarantees.
- ✓ Specific allowance for covered portion (with guarantees).
- ✓ Specific allowance for uncovered portion (with no guarantees).

The general allowance only applies to loan operations corresponding to borrowers rated A1 and A2. The specific allowances for covered and uncovered portions are applicable to all borrowers, except for those rated A1 and A2. Until December 2013, allowances were established solely for the uncovered portion of loan operations.

If the result of this calculation is negative or zero, the allowance is zero. If the total outstanding balance includes a stand-by principal balance, the credit equivalent indicated below should be used.

The adjusted value of the corresponding guarantee must be weighted with 100% when the borrower or co-borrower with the lowest risk rating is rated C2 or in another lower-risk rating, with 80% when rated D, and with 60% when rated E.

Risk ratings are as follows:

		<u>Historical payment</u>	
Risk rating	<u>Arrears</u>	<u>behavior</u>	Creditworthiness
A1	30 days or less	Level 1	Level 1
A2	30 days or less	Level 2	Level 1
B1	60 days or less	Level 1	Level 1 or Level 2
B2	60 days or less	Level 2	Level 1 or Level 2
C1	90 days or less	Level 1	Level 1, Level 2, or Level 3
C2	90 days or less	Level 1 or Level 2	Level 1, Level 2, or Level 3
D	120 days or less	Level 1 or Level 2	Level 1, Level 2, Level 3, or
			Level 4

Pursuant to articles 11 bis and 12 of SUGEF Directive 1-05, the calculations of the general allowance and the specific allowance for covered portion for loan operations must consider the provisions of Transition Provision XII of such Directive. Accordingly, as of December 31, 2014, the Bank applied an allowance percentage of 0.08%, which will gradually increase on a quarterly basis to 0.5%, pursuant to the aforementioned Transition Provision.

### Notes to Consolidated Financial Statements

Allowance percentages based on borrower risk rating are as follows:

		Specific allowance	Specific allowance
		percentage -	percentage -
Risk rating	General allowance	<u>Uncovered portion</u>	Covered portion
A1	0.5%	0%	0%
A2	0.5%	0%	0%
<b>B</b> 1	N/A	5%	0.50%
B2	N/A	10%	0.50%
C1	N/A	25%	0.50%
C2	N/A	50%	0.50%
D	N/A	75%	0.50%
E	N/A	100%	0.50%

In accordance with article 11 bis, *General allowance*, of CONASSIF Directive 1058/07 dated August 21, 2013, at each month-end, entities must book the general allowance for a minimum of 0.5% of the total outstanding balance for loan portfolios rated A1 and A2, without considering the effect of guarantees. The provisions of article 13 of the aforementioned Directive are to be applied to standby credits.

Starting January 2014 and as an exception in the case of risk rating E, the minimum specific allowance for borrowers whose historical payment behavior is classified in level 3 should be calculated as follows:

	<u>Specific</u>			
	<u>allowance</u>	<u>Specific</u>		
	percentage -	<u>allowance</u>	Creditworthiness	
	<u>Uncovered</u>	<u>percentage -</u>	(Group 1	Creditworthiness
<u>Arrears</u>	<u>portion</u>	Covered portion	borrowers)	(Group 2 borrowers)
30 days or less	20%	0.50%	Level 1	Level 1
30 days or less	50%	0.50%	Level 2	Level 1
More than 60	100%	0.50%	Level 1, Level 2,	Level 1 or Level 2
days			Level 3, or Level 4	

As of March 31, 2015, the allowance was calculated as follows:

	<u>Allowance</u>
<u>Arrears</u>	percentage
0 to 30 days	20%
31 to 60 days	50%
More than 61 days	100%

#### Notes to Consolidated Financial Statements

- If a borrower was rated E before subscribing a special loan operation, the borrower should remain in such rating during at least 180 days. During such period, the allowance percentage will be of 100% and the aforementioned exception should not be applied.
- In accordance with articles 11 bis and 12 of SUGEF Directive 1-05, at each month-end, the Bank must book, as a minimum, the general allowance and the sum of the specific allowances for each loan operation subscribed.

Pursuant to the provisions of SUGEF Directive 1-05, as of December 31, the Bank must maintain a structural allowance:

			March 2015	
				Excess
		Allowance	Structural	(insufficiency)
		booked	allowance	of allowance
Direct	¢	56,000,143,462	(53,424,833,817)	2,575,309,645
Stand-by		1,447,588,321	(969,159,442)	478,428,879
	¢	57,447,731,783	(54,393,993,259)	3,053,738,525
		_		_
			March 2014	
				Excess
		Allowance	Structural	(insufficiency)
		booked	allowance	of allowance
Direct	¢	45,738,720,624	(43,043,933,013)	(2,694,787,611)
Stand-by	_	884,608,211	(868,554,953)	(16,053,258)
	¢	46,623,328,835	(43,912,487,966)	(2,710,840,869)

As of March 31, 2015, the excess above the minimum allowance required by the current regulations in the amount of ¢3,053,738,524 (2014: ¢2,710,840,869) that represents a 4.67% (2014: 0.0143%) corresponds to an excess of ¢515,930,309 (2014: ¢2,699,961,148) arising from CONASSIF Directive 1058/07 (gradual general allowance) and an excess of ¢2,537,808,215 (2014: ¢10,879,721) in the specific allowance.

As of March 31, 2014, the amount of  $\phi$ 6,740,916 represents an excess of 0.0143% above the minimum allowance required by the current regulations.

#### Notes to Consolidated Financial Statements

SUGEF External Circular Letter 021-2009 dated May 30, 2009 indicates that the expense for the allowance for loan impairment corresponds to the amount necessary to reach the required minimum allowance. Furthermore, there must be duly documented technical justification for any excess above the minimum required allowance, which is to be sent to SUGEF with the authorization request. The excess may not surpass 15% of the minimum required allowance for the loan portfolio. This notwithstanding, if any additional allowances are required above 15%, they must be taken from net earnings for the period pursuant to article 10 of IRNBS.

As of March 31, 2015, the balance of the Bank's allowance for loan impairment (direct and stand-by), accrued interest receivable, and other receivables amounts to ¢63,178,470,433 (2014: ¢49,438,533,227).

## Credit equivalent

The following stand-by credit operations must be converted to credit equivalents based on the credit risk they represent. The credit equivalent is obtained by multiplying the balance of the stand-by principal by the corresponding credit equivalent conversion factor, as follows:

- a. Bid bonds and export letters of credit without prior deposit: 0.05;
- b. Other sureties and guarantees without prior deposit: 0.25; and
- c. Pre-approved lines of credit: 0.50.

## Allowance for other assets

Allowances should be established for the following assets:

a. Accounts and accrued interest receivable unrelated to loan operations, based on arrears calculated from the first day overdue or the date booked in the accounting records, as follows:

	<u>Allowance</u>
<u>Arrears</u>	<u>percentage</u>
30 days or less	2%
60 days or less	10%
90 days or less	50%
120 days or less	75%
More than 120 days	100%

#### Notes to Consolidated Financial Statements

b. Foreclosed assets acquired prior to May 2010 that have not been sold or leased within two years from the date of their acquisition, an allowance equivalent to 100% of their value. The booking of the allowance shall begin at month-end of the month in which the assets were: i) acquired, ii) produced for sale or lease, or iii) retired from use. After May 2010, an allowance must be established gradually by booking one-twenty-fourth of the value of the assets each month until the allowance is equivalent to 100% of the assets' carrying amount. The booking of the allowance shall begin at month-end of the month in which the assets were acquired.

As of March 31, 2015, the carrying amount of the allowance for impairment of foreclosed assets and per legal requirements amounts to ¢57,611,857,316 (2014: ¢56,712,451,016).

The concentration of the loan portfolio by sector is as follows:

		I	Direct	Stand-by		
Sector		March 2015	March 2014	March 2015	March 2014	
Trade	¢	347,695,436,284	375,961,516,094	81,695,965	75,686,889	
Services		677,699,493,183	601,401027,870	49,376,115,794	56,066,686,641	
Financial services		101,974,853,842	108,699,505,799	-	-	
Mining		412,633,217	43,600,941	-	-	
Manufacturing and						
quarrying		159,619,804,440	143,073,265,277	1,282,989	3,268,613	
Construction		77,137,174,279	82,029,902,879	-	-	
Agriculture and forestry		102,499,052,663	95,551,914,443	13,420,622	12,400,951	
Livestock, hunting, and						
fishing		60,309,463,221	61,267,763,193	7,151,867	3,013,017	
Electricity, water,						
sanitation, and other						
related sectors		279,142,708,814	225,534,926,211	-	-	
Transportation and						
telecommunications		20,894,551,317	26,377,938,710	-	-	
Housing		1,067,728,632,781	1,015,534,539,274	11,789,846	11,700,290	
Personal or consumer		346,271,326,030	319,292,000,711	200,990,074,396	187,576,369,277	
Tourism		121,468,787,592	123,491,462,062	169,240,137	173,100,113	
	¢	3,362,853,917,663	3,178,259,363,464	250,650,771,616	243,922,225,791	

The concentration of the loan portfolio by geographic area is as follows:

		Dir	ect	Stand-by		
		March 2015	March 2014	March 2015	March 2014	
Central America	¢	3,362,853,917,663	3,178,259,363,464	250,650,771,616	243,922,225,791	

### Notes to Consolidated Financial Statements

The loan portfolio by type of guarantee is as follows:

		Dir	rect	Stand	l-by
Guarantee		March 2015	March 2014	March 2015	March 2014
Investments	¢	8,616,472,308	9,476,114,558	2,454,720	26,917,000
Mortgage bond		10,693,899,148	10,282,049,630	-	-
Assignment of loans		330,369,524,754	327,458,234,001	-	-
Mortgage		1,568,470,985,824	1,536,957,993,859	379,213,804	319,269,303
Surety		620,180,629,066	607,047,637,103	139,940	-
Trust		257,139,809,451	239,355,575,157	105,640,203	492,996,767
Securities		1,208,586,586	1,543,900,553	13,052,508	-
Chattel mortgage		124,866,598,454	107,412,464,882	-	-
Other		441,307,412,072	338,725,393,721	250,150,270,441	243,083,042,721
	¢	3,362,853,917,663	3,178,259,363,464	250,650,771,616	243,922,225,791

#### Guarantees:

<u>Collateral</u>: The Bank accepts collateral guarantees —usually mortgages, chattel mortgages, or securities— to secure its loans. The value of those guarantees is determined based on their fair value in the case of securities or, for mortgages and chattel mortgages, based on an appraisal made by an independent appraiser who determines the estimated fair value of land and buildings using comparable market offerings and prior appraisals.

<u>Personal</u>: The Bank also accepts sureties from individuals or legal entities. The Bank evaluates the guarantor's ability to honor the debt obligations on the borrower's behalf, as well as the integrity of the guarantor's credit history.

The Bank conducts strict credit analyses before granting loans and requires guarantees from its borrowers before disbursing loans. As of March 31, 2015, 48.17% of the loan portfolio is secured by collateral guarantees (March 2014: 46.36%).

#### Notes to Consolidated Financial Statements

As of March 31, the concentration of the loan portfolio by individual borrower or economic interest group is as follows:

		Dir	ect	Stand-by			
Loan portfolio concentration	_	March 2015	March 2014	March 2015	March 2014		
¢1 to ¢3,000,000	¢	144,479,085,861	145,581,668,688	89,191,827,523	86,666,114,171		
¢3,000,001 to ¢15,000,000		506,010,928,346	494,334,349,056	108,967,436,970	99,101,121,663		
¢15,000,001 to ¢30,000,000		407,126,248,199	395,293,804,023	5,937,637,769	5,522,599,688		
¢30,000,001 to ¢50,000,000		385,198,210,982	356,849,336,800	1,825,162,825	2,445,168,266		
¢50,000,001 to ¢75,000,000		261,414,356,788	238,975,407,788	1,463,823,928	1,128,091,301		
¢75,000,001 to ¢100,000,000		118,342,503,521	113,055,833,213	1,244,369,182	859,137,335		
¢100,000,001 to ¢200,000,000		196,855,593,044	196,765,429,616	3,023,715,218	3,516,738,643		
More than ¢200,000,000		1,343,426,990,922	1,237,403,534,280	38,996,798,201	44,683,254,724		
	¢	3,362,853,917,663	3,178,259,363,464	250,650,771,616	243,922,225,791		

As of March 31, 2015 and 2014, the portion of the loan portfolio (direct and stand-by loans) corresponding to economic interest groups amounts to &ppeq225,648,853,378 and &ppeq280,749,178,434, respectively.

For credit risk management purposes, the Bank applies an internal model to estimate the loan portfolio's Expected Losses (EL) and Value at Risk (VaR) over a one-year holding period using the "Monte Carlo simulations" approach. Loan portfolio risks are assessed, controlled, and monitored on a monthly basis based on one-year projections (maximum loss with a confidence level of 99% over one year).

This approach is applied using a computational system developed in "Matlab" software. Also, the credit risk model takes into consideration the impact of changes in macroeconomic variables (endogenous and exogenous) on the loan portfolio when determining systemic factors. Results are compared with prior-month estimates and historical trends (for comparison purposes, loan portfolio information is available for 2003 and thereafter).

The Bank's loan portfolio is comprised of operations in various currencies, i.e. the Costa Rican colon, the U.S. dollar, and DU. Consequently, the VaR analysis is performed separately for each currency. The data is then consolidated to determine a maximum loss for the entire portfolio, expressed in colones. VaR is also calculated for each of the Bank's 13 economic activities, its credit card accounts, and the BN-Desarrollo portfolio.

- Various technical tools are used to provide other angles for the analysis. Other types of estimates are made in addition to those obtained using the VaR methodology, such as the performance of the portfolio in legal collections, concentration of the portfolio by economic activity, vintage analysis, stress testing, transition matrixes, and sensitivity analyses for new loans, and/or follow-up. Accordingly, the Bank has developed specialized internal methodologies to model credit risk that quantify risk indicators and potential impacts on institutional development.
- The use of the above analyses has led to sound credit risk management practices that, along with tight control over loan collection, have helped to substantially improve the level of arrears in the loan portfolio.
- With that purpose and to continually improve the calculation models, a recent adjustment in the parameters used for quantification of credit risk was performed to obtain more accurate credit risk estimates. Consequently, subsequent to the aforementioned adjustment, results obtained exceed prior results (specifically between March and June 2014). The Corporate Risk Committee and the Board of Directors approved the methodology.
- In spite of the decrease in arrears in the loan portfolio, the VaR of credit increased by 0.03 p.p., from 2.44% in February 2015 to 2.47% in March 2015, remaining below the target limit. This is explained by the increase in arrears between 31 and 90 days in loan operations.
- With respect to currency, the risk indicator in colones and DU increases monthly, due to the impairment of the loan portfolio more than 90 days. The portfolio in U.S. dollars presents a decrease, justified by the recovery of the portfolio.
- Most of the activities show a decrease in the VaR due to the recovery of loan operations in legal collections and more than 90 days past due, showing variations ranging between 0.12 pp and 0.50 pp. This is the case for Tourism, Services, Transportation, Trade, Construction, and Industry. The decrease observed in Agriculture (0.23 pp) and Livestock (0.23 pp) is related only to the decrease in legal collections.
- The only increases in VaR correspond to Housing and Consumer, resulting from the increase in arrears more than 90 days in loan operations and to an impairment of the loan portfolio between 31 and 90 days.
- The performance of the VaR of Energy, Financial Services, and Mining is strongly influenced by the concentration of such portfolios, which causes monthly increases and decreases.

#### Notes to Consolidated Financial Statements

- For the Investment Fund Manager, credit risk is the risk that the borrower or issuer of a financial asset will fail to discharge an obligation, fully and on time, in accordance with the terms and conditions agreed upon at the time the financial asset was acquired.
- Credit risk is considered to be minimal since the Investment Fund Manager's portfolio is comprised of securities issued by BCCR and the Ministry of Finance. Such risk is measured and monitored using the Return on Risk-Adjusted Capital (RORAC) methodology.
- To mitigate credit risk, the Investment Fund Manager monitors the issuers' risk, obtains ratings assigned to issuers by risk rating agencies, and maintains access to information necessary for following-up on significant events for each issuer that could adversely affect its rating or outlook.

The Investment Fund Manager has established the following procedures to manage credit risk:

- formulation of credit policies
- definition of concentration and exposure limits, which are included in the risk management and investment policy
- policy compliance reviews through analyses of the composition of the investment portfolio.
- The Investment Fund Manager enters into repurchase agreements, which can lead to credit risk exposure if the counterparty to the transaction is unable to fulfill its contractual obligations. Repurchase agreements are secured by securities pledged by the counterparty, but are not directly secured by the Costa Rican National Stock Exchange. In the event of default, the Investment Fund Manager has recourse to the guarantee fund and to traditional recovery mechanisms such as termination of the agreement and foreclosure.
- For the Brokerage Firm, credit risk is the risk of potential losses resulting from an issuer's failure to pay or from deterioration in the credit rating of the security or issuer.
- To manage credit risk, the Brokerage Firm has identified risk factors, i.e. variables for which changes could affect the equity of the Brokerage Firm.

### Notes to Consolidated Financial Statements

To mitigate credit risk, the Brokerage Firm's liquidity policy sets the following limits:

Pursuant to the requirements set out in the investment policy, the Brokerage Firm takes into consideration the ratings granted by rating agencies to local or international issues, in compliance with the provisions of current regulations.

The Brokerage Firm assesses the marketability of the instruments based on internally calculated indicators. In the case of investments in the local market, the Brokerage Firm considers those registered with the National Registry of Securities and Brokers, while for investments in international markets, the Brokerage Firm considers instruments that may be sold at any point in time.

Consequently, in order for the Brokerage Firm to acquire securities issued abroad, those securities must have been assigned a risk rating by a risk rating agency authorized by SUGEVAL or by a renowned international risk rating agency such as Standard & Poor's, Moody's, or Fitch. This requirement does not apply to securities issued abroad by the Government of Costa Rica, BCCR, and other Costa Rican public institutions.

The Brokerage Firm may acquire the following instruments:

- Fixed income external debt securities issued by the Government of Costa Rica, BCCR, and other Costa Rican public institutions.
- Fixed income securities issued by the government or the central bank of countries that have been assigned an investment grade rating.
- Investment grade corporate bonds and fixed income securities issued by supranational entities.
- Structured notes issued by investment grade banks, provided that the underlying
  instrument is not related to commodities, stock indexes, or shares; has a risk
  rating that is not below the risk rating assigned to Costa Rica; and is available for
  public offering on a national or international stock exchange, subject to prior
  approval of General Management.

### Local currency:

In local currency, the Brokerage Firm may invest in instruments issued by the Government of Costa Rica, BCCR, commercial State-owned banks, and local and foreign public or private entities authorized by SUGEVAL, which issue securities that meet the set criteria and investment limits and that may be freely transferred in the Costa Rican securities market.

#### Notes to Consolidated Financial Statements

The weighted average duration of the total portfolio based on Macauley's duration and by weighing the carrying amount of each investment shall not exceed 2.75 years.

The Brokerage Firm's financial instruments are concentrated as follows:

- As of March 2015, the accounting records showed investments in colones, investments in instruments issued by local issuers in U.S. dollars (\$CR), and investments in instruments issued by foreign issuers in U.S. dollars (\$USA). The Brokerage Firm holds no investments in DU. By currency, the majority (86.62%) of the Brokerage Firm's financial instruments is concentrated in the portfolio denominated in colones.
- The consolidated portfolio is comprised of investments in instruments issued by the Government of Costa Rica (61.70%), BCCR (12.32%), BPDC (9.12%), MUCAP (3.47%), and the Bank (0.01%). These issuers represent 86.62% of the consolidated portfolio. The portfolio denominated in U.S. dollars represents 13.38%, comprised of investments issued by the Government of Costa Rica (12.25%), Banco de San José (0.93%) and other issuers (0.20%).
- For the Pension Fund Manager, since April 2008, the Bank's Credit Risk Division has applied a method based on the Merton model to quantify the VaR levels of the investment portfolio. Such method assumes a normal loss distribution and those exposures are perfectly correlated, which causes VaR to be overestimated.
- The Merton model utilizes the following three basic inputs: the fair values of securities, the probability of default for each issuer, and the percentage of expected losses for each issuer. Fair values are obtained from the Oracle Financial Services Application (OFSA) and the remaining two inputs are obtained using estimates from international rating agencies, primarily Moody's.
- Additionally, based on whether the issuer is a private or public issuer, a correlation table is calculated based on quarterly changes in equity prices or the government's creditworthiness.
- Once the above information has been obtained, the Merton model uses the "Monte Carlo simulation" approach to generate loss scenarios (maximum loss with a confidence level of 99%).
- The above method is used to generate monthly analyses of changes in the balances in the Pension Fund Manager's investment portfolio in each currency, by type of fund, and to quantify the corresponding VaR.

- A yearly analysis of maximum and minimum VaR for the Pension Fund Manager by currency is also generated as required by SUPEN's Regulations on Investments. Those values are calculated for both the portfolio in colones and the portfolio in U.S. dollars, using the Merton model based on the limits set by SUPEN for investments per issuer.
- As of March 31, 2015, the net assets managed by the Pension Fund Manager amount to ¢897,481.16 million, growing year-on-year by ¢129,249.87 million. This implies a growth rate of 16.82% with respect to the portfolio managed as of March 2014. These data do not include the Pension Fund Manager's own assets.
- The pension fund with the highest relative share is ROP, which represents 80.37% and shows a year-on-year growth of ¢105,183.58 million and a growth rate of 17.07% with respect to March 2014.
- As of March 31, 2015, the portfolio of the Pension Fund Manager's own funds included available-for-sale investments in the amount of  $\phi$ 5,597.37 million, which increased year-on-year by  $\phi$ 93.31 million as of March 31, 2014.
- The VaR of credit of the portfolio of the Pension Fund Manager's own funds is 0.47%, which means that only in 1 out of 100 observation days the loss on the portfolio exceeded 0.47% of the total portfolio. These amounts are relatively low, which is explained by the fact that only two of the assets that comprise the portfolio have a probability of default (PD).

Consolidated VaR (one year)	As of March 31,				
Fund	2015	2014			
FCL	0.39%	0.25%			
FPC A	0.50%	0.38%			
FPC B	6.28%	6.80%			
FPD A	33.39%	29.65%			
FPD B	37.44%	34.93%			
NOT	0.00%	0.00%			
ROP	5.35%	5.54%			
BN Vital OPC	0.47%	0.49%			

### Notes to Consolidated Financial Statements

- For the Insurance Brokerage Firm, credit risk is the risk that the borrower or issuer of a financial asset will fail to discharge an obligation, fully and on time, in accordance with the terms and conditions agreed upon at the time the financial asset was acquired. Credit risk arises mainly on cash and due from banks and investments in financial instruments and is represented by the carrying amount of the assets in the balance sheet.
- At the consolidated balance sheet date, there are no significant concentrations of credit risk. The maximum exposure to credit risk is represented by the carrying amount of each financial asset and is based on parameters established by current regulations.
- As of March 31, 2015 and 2014, exposure to credit risk is represented by the carrying amounts of cash and due from banks and available-for-sale investments. As of those dates, cash and due from banks corresponds to deposits made in checking accounts in a State-owned bank. As of March 31, 2015 investments in financial instruments correspond to investments in the investment fund denominated BN Fon Depósito Colones No Diversificado (non-diversified colones), which is secured by term certificates of deposit issued by the Bank.

### b) Liquidity risk

- Liquidity risk arises when the financial entity is unable to honor its commitments or obligations with third parties due to insufficient cash flows, among other factors. It also represents the risk of potential losses due to forced sales of assets or forced acceptances of liabilities under unfavorable conditions.
- To support liquidity risk management, the Market Risk Division monitors indicators such as liability structure, daily changes and trends in demand and term account balances, volatility of deposit-taking from the public (duration by liability and currency), VaR of liquidity, levels of concentration of the Bank's funding sources, liquidity coverage ratio, systemic liquidity indicators, and variables with the greatest impact on SUGEF's term matching indicators. All of this information is communicated to management in a monthly report that is reviewed by the Corporate Risk Committee and subsequently escalated to the Board of Directors.

# Notes to Consolidated Financial Statements

As of March 31, 2015, the terms of the Bank's assets and liabilities denominated in local currency are matched as follows:

						Days				
	-	Past due	Demand	1 to 30	31 to 60	61 to 90	91 to 180	181 to 365	More than 365	Total
Cash and due from banks	¢	-	68,210,195,074	-	-	-	-	-	-	68,210,195,074
Minimum cash reserve in BCCR		-	400,701,169,444	-	-	-	-	-	-	400,701,169,444
Investments		-	-	31,127,560,251	134,243,859	18,504,932,381	44,165,508,586	89,906,028,585	308,930,895,714	492,769,169,376
Loan portfolio		108,886,843,862	3,763,862,825	30,156,723,216	33,248,799,661	27,921,446,920	62,393,812,068	81,703,931,251	1,732,146,376,850	2,080,221,796,653
Total recovery of assets	¢	108,886,843,862	472,675,227,343	61,284,283,467	33,383,043,520	46,426,379,301	106,559,320,654	171,609,959,836	2,041,077,272,564	3,041,902,330,547
	-									
Obligations with the public	¢	-	1,482,558,610,266	194,332,336,687	112,014,754,169	82,158,952,232	273,460,240,464	215,762,866,096	83,176,190,254	2,443,463,950,168
Obligations with BCCR		-	-	-	-	-	-	-	171,585,500	171,585,500
Obligations with financial entities		-	94,412,297,613	10,631,865,881	5,728,559,797	56,754,105	38,083,779,851	3,247,913,056	2,864,746,393	155,025,916,696
Charges payable		-	5,994,788,743	5,644,663,562	2,835,946,375	1,661,088,211	1,662,026,489	411,007,247	137,931,446	18,347,452,073
Total maturity of liabilities	¢	-	1,582,965,696,622	210,608,866,130	120,579,260,341	83,876,794,548	313,206,046,804	219,421,786,399	86,350,453,593	2,617,008,904,437
Difference	¢	108,886,843,862	(1,110,290,469,279)	(149,324,582,663)	(87,196,216,821)	(37,450,415,247)	(206,646,726,150)	(47,811,826,563)	1,954,726,818,971	424,893,426,110

# Notes to Consolidated Financial Statements

As of March 31, 2014, the terms of the Bank's assets and liabilities denominated in local currency are matched as follows:

						Days				
		Past due	Demand	1 to 30	31 to 60	61 to 90	91 to 180	181 to 365	More than 365	Total
Cash and due from banks	¢	-	54,565,563,524	-	-	-	-	-	-	54,565,563,524
Minimum cash reserve in BCCR		-	390,124,254,708	-	-	-	-	-	-	390,124,254,708
Investments		-	-	8,976,206,979	5,287,412,785	7,475,765,282	34,975,252,603	139,317,446,678	311,700,227,358	507,732,311,685
Loan portfolio	_	102,375,868,507	821,884,635	34,007,350,119	36,391,214,707	26,020,252,568	55,373,474,823	81,226,479,917	1,580,089,926,988	1,916,306,452,264
Total recovery of assets	¢	102,375,868,507	445,511,702,867	42,983,557,098	41,678,627,492	33,496,017,850	90,348,727,426	220,543,926,595	1,891,790,154,346	2,868,728,582,181
Obligations with the public	¢	-	1,397,735,755,576	231,193,144,682	98,051,827,090	62,580,798,520	327,757,434,356	169,441,209,278	41,710,488,280	2,328,470,657,782
Obligations with BCCR		-	-	22,000,000,000	-	-	-	-	193,411,054	22,193,411,054
Obligations with financial entiti	es	-	83,697,830,404	11,754,673,692	794,488,352	607,140,985	2,597,803,815	776,258,978	1,551,963,916	101,780,160,142
Charges payable		-	5,330,940,456	4,184,307,550	2,305,614,343	724,677,783	1,158,283,351	258,762,837	106,909,723	14,069,496,043
Total maturity of liabilities	¢	-	1,486,764,526,436	269,132,125,924	101,151,929,785	63,912,617,288	331,513,521,522	170,476,231,093	43,562,772,973	2,466,513,725,021
Difference	¢	102,375,868,507	1,041,252,823,569	226,148,568,826	-59,473,302,293	30,416,599,438	- 241,164,794,096	50,067,695,502	1,848,227,381,373	402,214,857,160

# Notes to Consolidated Financial Statements

As of March 31, 2015, the terms of the Bank's assets and liabilities denominated in foreign currency, expressed in local currency, are matched as follows:

			Days							
		Past due	Demand	1 to 30	31 to 60	61 to 90	91 to 180	181 to 365	More than 365	Total
Cash and due from banks	¢	-	67,840,452,953	-	-	-	-	-	62,255,847	67,902,708,800
Minimum cash reserve in BCCR		-	204,576,091,558	-	-	-	-	-	-	204,576,091,558
Investments		-	404,395	9,264,841,316	29,558,820,984	10,391,897,996	68,147,576,994	181,245,723,375	372,698,537,018	671,307,802,078
Loan portfolio		47,462,458,414	17,445,719,331	27,678,820,808	28,014,184,192	35,671,903,530	71,063,802,600	74,659,766,701	980,635,465,433	1,282,632,121,009
Total recovery of assets	¢	47,462,458,414	289,862,668,237	36,943,662,124	57,573,005,176	46,063,801,526	139,211,379,594	255,905,490,076	1,353,396,258,298	2,226,418,723,445
Obligations with the public	¢	-	746,613,327,895	87,222,242,739	80,369,333,112	66,701,237,314	148,609,212,772	54,522,175,661	5,936,079,903	1,189,973,609,396
Obligations with financial entities		-	160,516,042,695	9,924,525	2,642,146,275	1,855,516,779	19,834,474,212	3,628,056,443	786,207,836,250	974,693,997,179
Charges payable		-	765,747,130	710,961,779	14,371,419,876	599,953,506	334,187,153	143,345,137	23,563,275	16,949,177,856
Total maturity of liabilities	¢	-	907,895,117,720	87,943,129,043	97,382,899,263	69,156,707,599	168,777,874,137	58,293,577,241	792,167,479,428	2,181,616,784,431
Difference	¢	47,462,458,414	(618,032449,483)	(50,999,466,919)	(39,809,894,087)	(23,092,906,073)	(29,566,494,543)	197,611,912,835	561,228,778,870	44,801,939,014

As of March 31, 2014, the terms of the Bank's assets and liabilities denominated in foreign currency, expressed in local currency, are matched as follows:

			Days							
		Past due	Past due	Past due	Past due	Past due	Past due	Past due	Past due	Past due
Cash and due from banks	¢	-	307,578,200,301	-	-	-	-	-	432,279,554	308,010,479,855
Minimum cash reserve in BCCR		-	191,826,481,944	-	-	-	-	-	-	191,826,481,944
Investments		-	-	832,782,159	7,566,688,652	10,136,028,443	30,436,475,387	102,694,945,619	235,937,450,583	387,604,370,843
Loan portfolio		43,953,558,630	10,686,308,070	25,395,697,843	22,660,574,703	26,770,368,106	52,508,944,270	51,275,193,708	1,028,702,265,870	1,261,952,911,200
Total recovery of assets	¢	43,953,558,630	510,090,990,315	26,228,480,002	30,227,263,355	36,906,396,549	82,945,419,657	153,970,139,327	1,265,071,996,007	2,149,394,243,842
Obligations with the public	¢	-	776,095,930,480	96,626,501,296	84,638,267,055	44,552,219,536	147,240,723,326	32,594,961,560	8,834,508,619	1,190,583,111,872
Obligations with financial entities		-	150,120,830,725	47,610,262	231,852,696	2,443,149,684	34,054,516,262	31,832,179	783,352,328,983	970,282,120,791
Charges payable		-	823,007,857	734,979,585	12,999,510,506	1,922,141,169	686,162,803	109,459,902	35,671,248	17,310,933,070
Total maturity of liabilities	¢	-	927,039,769,062	97,409,091,143	97,869,630,257	48,917,510,389	181,981,402,391	32,736,253,641	792,222,508,850	2,178,176,165,733
Difference	¢	43,953,558,630	(416,948,778,747)	(71,180,611,141)	(67,642,366,902)	(12,011,113,840)	(99,035,982,734)	121,233,885,686	472,849,487,157	(28,781,921,891)

- For the Investment Fund Manager, liquidity risk is the risk that it will be unable to liquidate its investments on a timely basis and for an amount that approximates fair value in order to meet its liquidity needs.
- Liquidity risk management is closely related to credit risk management since they both involve facilitating the trading of securities in the financial market.
- For the Brokerage Firm, liquidity risk is the risk of potential losses due to premature or forced sales of assets at unusual discounts in order to fulfill commitments, or the risk that a position cannot be liquidated, acquired, or hedged in a timely manner by offsetting it with an equivalent position.
- To manage liquidity risk, the Brokerage Firm has established its liquidity levels based on its cash needs, diversified its funding sources, and formulated policies to monitor risk exposures.
- Liquidity risk is also the risk that the Brokerage Firm will be unable to meet all of its obligations due to an unexpected withdrawal of funds from creditors or customers, a decrease in the value of investments, the excessive concentration of liabilities in a single creditor, a mismatch of assets and liabilities, the lack of liquid assets, or the financing of long-term assets with short-term liabilities, etc. The Brokerage Firm's approach to managing liquidity is to ensure that it will always have sufficient liquidity to meet its liabilities when due under normal conditions.
- Risk management has become essential for most entities that operate in financial markets since successful investment portfolio management is directly linked to good risk management practices. These entities have increasingly become aware of the importance of having an adequate system in place to measure and monitor positions assumed in order to manage risk exposures.
- The Brokerage Firm has been compelled to increasingly diversify its investments in response to the development of the securities market, which has given rise to the need for a mechanism for making timely decisions to take advantage of investment opportunities in domestic and international markets.
- In light of that situation, the Brokerage Firm must have sufficient tools for measuring and monitoring the risks on its investments in order to maximize return while minimizing risk. For such purposes, the Brokerage Firm has documented liquidity risk policies aimed at limiting liquidity risk exposures.

- The Brokerage Firm's liquidity policies establish that the trader of the Brokerage Firm's own portfolio is responsible for executing investments and making any investment decisions related to that portfolio, in accordance with the provisions set forth in the guidelines for management of the Brokerage Firm's own portfolio and in compliance with current legal regulations and with the Brokerage Firm's internal and corporate rules, regulations, and procedures.
- Marketability of local market investments is determined based on indicators calculated by the Brokerage Firm for such purposes and on whether they are registered in the National Registry of Securities and Brokers. The Brokerage Firm must comply with maximum and minimum maturity concentrations, which require that a minimum of 20% of the total portfolio correspond to investments with maturities of 12 months or less. The investment portfolio should not include investments in equity instruments or investments in publicly-offered real estate funds.
- The liquidity level of the Pension Fund Manager corresponds to the nature of its operations. The entity holds a portfolio of short-term assets as well as liquid investments to ensure it has sufficient liquidity. As part of liquidity controls, cash flows are monitored on a daily basis, taking into consideration checking account balances and projected cash needs for up to 3 days after the calculation. Accordingly, the entity could sell financial assets or invest surpluses that will not be used in the short term, if necessary.
- When analyzing liquidity, the net maximum amount expected to be withdrawn from each pension fund is determined based on historical information assuming normal conditions. This liquidity analysis uses historical data for the period running from inception of each fund until the present. The analysis calculates the percentile (95% and 99% in this case) of the empirical distribution of net withdrawals for each of the funds analyzed to determine the VaR of liquidity.
- The methodology used consists of calculating the percentile (in this case 95% and 99%) on the empirical distribution of net withdrawals for each of the funds to be analyzed. The result will be considered in the VaR of liquidity.
- Set out below are the main results of the VaR of liquidity assessment. Such analysis is based on three scenarios: Scenario one includes all movements and scenario two includes data for which withdrawals are greater than contributions. For these two scenarios, observations with one or two deviations over the average were eliminated with the purpose of performing a comparative analysis. Scenario three includes extreme values; for example, the annual transfer of the FCL to ROP.

### Notes to Consolidated Financial Statements

	All mo	vements	Contri	butions	Extrem	e values	Cash/Equity	
Fund	2015	2014	2015	2014	2015	2014	2015	2014
ROP	0.58%	0.64%	0.30%	0.32%	0.78%	0.82%	1.20%	1.60%
FCL	0.95%	1.00%	2.11%	2.49%	15.90%	18.11%	2.30%	3.40%
NOT	0.09%	0.09%	0.18%	0.29%	0.32%	0.32%	1.20%	0.80%
FPC A	0.77%	0.79%	1.20%	1.21%	2.96%	3.02%	2.30%	2.90%
FPC B	0.49%	0.47%	1.32%	1.32%	2.21%	1.94%	2.80%	3.80%
FPD A	1.35%	1.40%	3.00%	3.00%	7.43%	7.64%	4.00%	4.60%
FPD B	0.76%	0.73%	1.22%	1.17%	3.27%	3.17%	2.70%	3.10%

According to the results, for the scenario that considers all movements, the VaR of funds at a 99% confidence level with two standard deviations would not exceed 1%, except for the FPD A where the VaR at 99%, eliminating two standard deviations, would reach 1.35%. The FPD A and FCL show the highest risk exposure while the VaR of NOT is almost nil, which is in line with prior liquidity reports and the closed nature of this fund.

The second scenario shows higher VaR levels for all funds since it only considers the variables where withdrawals are higher than contributions. The voluntary pension funds and FCL are the funds with higher risk levels. In spite of presenting higher risk exposure, for all cases, risk levels are equivalent to or below 3%.

The third scenario shows higher liquidity needs to face extreme conditions; however, as mentioned above, the most extreme situation is the transfer of FCL to ROP, which represents a VaR of 17.47% as of March 2015.

The liquidity levels at month-end are presented for each of the funds as a proportion of net assets. Liquidity levels are consistent with the VaR calculated for each fund, without compromising the yield thereof.

## Liquidity risk management

Risk Management policies establish a liquidity limit which determines that a maximum liquidity level will be maintained to address the investment needs and operations of the Company and the characteristics of the pension plan, according to the need arising from the nature of the Pension Fund Manager itself.

### Notes to Consolidated Financial Statements

- All policies and procedures are subject to review and approval by the Risk Committee and the Investment Committee. The Board of Directors has established minimum liquidity levels on the minimum portion of funds available to meet the fund requirements.
- The liquidity level of the Pension Fund Manager corresponds to the nature of its operations. The entity holds a portfolio of short-term assets as well as highly-liquid investments to ensure it has sufficient liquidity. As part of liquidity controls, cash flows are monitored on a daily basis, taking into consideration checking account balances and projected cash needs for up to 3 days after the calculation. Accordingly, the entity could sell financial assets or invest surpluses that will not be used in the short term, if necessary.
- For the Insurance Brokerage Firm, liquidity risk is the risk that the entity will be unable to honor its commitments or obligations with third parties due to insufficient cash flows, resulting from a mismatch of the terms of assets and liabilities.

## c) Market risks

- To assess market risk, the Bank analyzes the probability that the value of its own investments will decrease as a result of changes in interest rates, foreign exchange rates, prices of instruments, and other economic and financial variables as well as the economic impact of those changes, which could expose the Bank to market risk. The objective of market risk management is to follow-up on and control market risk exposures within acceptable parameters (risk limits approved by the Board of Directors), while optimizing the return.
- The main indicator used is the VaR of the Bank's investments, which is determined for each currency in which the Bank holds positions. That indicator is complemented with the Risk-Adjusted Return on Capital (RAROC), which summarizes the Bank's risk-return profile derived from holding an investment portfolio.
- As of March 31, 2015, investments in Z Bonds related to the Mortgage Securitization Trust in the amount of ¢57,176,371 (2014: ¢58,366,822), equivalent to US\$417,000 (2014: US\$417,000) were valued at 74% of their face value (impairment of 26%).

## Notes to Consolidated Financial Statements

- For the Investment Fund Manager, market risk is the risk of potential losses in the fair value of its financial instrument portfolio or its trading positions before they are derecognized. The loss is equivalent to the difference between the fair value when the instrument was acquired and the fair value at the date the instrument was derecognized. The degree of risk depends on the settlement period and the volatility and liquidity of markets.
- As a systemic risk, market risk depends on a series of factors that are strongly linked to macroeconomic performance and is inherent to the market environment, thereby affecting all participants in a given market.

## Market risk management

- Market risks have been calculated since late 2003 and a database of those calculations is available for consultation when setting corresponding risk limits.
- Potential losses arising on changes in risk factors, such as changes in interest rates, which affect the valuation of positions are calculated daily.
- For such purposes, the Investment Fund Manager uses the RiMeR methodology, which was internally developed by the Mathematical Modeling and Market Risk Divisions of the Bank. This methodology permits calculating the VaR of portfolios comprised of fixed income instruments. The model considers yield curves, rate model parameter estimation, scenario simulations, and calculation of VaR. This methodology uses a two-factor rate model (G2++ model), which involves decomposing the short rate into two processes and a deterministic function to be selected.
- VaR of price risk and fair value is calculated on a daily basis, and all results are reported to the Investment Fund Manager's Financial Resources Investment Committee each month.
- The Investment Fund Manager uses the above methods and calculations to analyze a portion of risk on its portfolios and the correlation between risk and return over a given period of time. The Sharpe ratio measures the risk-adjusted return based on the relationship between return and a risk-free assets and the volatility of returns.

## <u>Market risk exposure – trading portfolio:</u>

The Investment Fund Manager sets VaR limits for all identified market risks. The structure of those limits is subject to review and approval by the Investment Committee and Board of Directors, respectively, and is based on the local VaR limits of the trading portfolio. VaR is calculated at each month-end, with reports on the usage of VaR limits submitted to the Investment Committee.

## Notes to Consolidated Financial Statements

The VaR of the Investment Fund Manager's portfolio is as follows:

	March 2015	March 2014
VaR (99% confidence level)	0.00%	1.65%

## Fair values

- Fair value estimates are made at a specific date, based on relevant market information and information concerning the financial instruments. These estimates do not reflect any premium or discount that could result from offering for sale a particular financial instrument at a given point in time.
- These estimates are subjective in nature and involve uncertainties and matters of significant judgment and, therefore, cannot be determined with precision.
- As of March 31, 2015 and 2014, the carrying amount of the following financial instruments approximates fair value: cash, investments in financial instruments, interest receivable, obligations under repurchase agreements, interest payable, fees and commissions, and other accounts payable. Investments are carried at the fair value determined using the method described above.
- For the Brokerage Firm, market risk is the potential losses due to changes in risk factors that affect the valuation of positions, such as interest rates, foreign exchange rates, and price indices, which can result in either loss or gain for the Brokerage Firm. The objective of market risk management is to manage and control market risk exposures within acceptable parameters, while optimizing the return on risk.
- All derivatives, trading investments, and available-for-sale investments are recognized at fair value, and therefore, any changes in market conditions directly affect the Brokerage Firm's net income. Market risk is the risk that the fair value of those instruments will fluctuate as a result of changes in interest rates, foreign exchange rates, or equity prices.
- Management of the Brokerage Firm controls market risk exposures on a daily basis by applying VaR analyses and other methods supported by the investment parameters under which the Brokerage Firm operates.
- Additionally, the Brokerage Firm's approach to market risk management is to identify risk factors, monitor any such factors identified using market analyses, and assess positions that are subject to price risk using models that measure potential losses on those positions as a result of changes in equity prices, interest rates, or foreign exchange rates.

## Notes to Consolidated Financial Statements

## Price risk exposure:

- The Brokerage Firm mainly measures and controls price risk exposure using VaR, which estimates possible losses in a portfolio over a predetermined time period ("holding period"). Because the portfolio may be affected by adverse changes in the market, a specific probability is quantified and used as the confidence level applied in the VaR calculation. Price risk exposure is low and has been controlled through investments.
- The Brokerage Firm uses the historical method to calculate VaR, as established in the risk regulations issued by SUGEVAL, based on a confidence level of 95% and a holding period of 22 days. As a complement to determine price risk exposure, the Brokerage Firm uses the consolidated VaR model, provided by the Bank's Risk Division, which assumes a 99% confidence level and a 30-day holding period, based on the Monte Carlo approach.
- The Pension Fund Manager manages market risk for each of its funds by applying a VaR model pursuant to Section 41 of IFRS 7. The calculation of market risk indicators are mainly performed using the RiMeR software, which estimates the VaR of the portfolios managed by the Bank and its subsidiaries. VaR is determined by adjusting the portfolio and calculating its duration and price. The total portfolio duration is the average amount-weighted durations. The RiMeR methodology applies daily parameters (modeling rising volatility curves) and efficiently captures market movements. Such parameters are denominated G2++ and are an extension of the Hull-White model.

#### Interest rate risk

- Interest rate risk is the risk of losses in the value of a financial asset or liability arising from fluctuations in interest rates, when changes in interest rates for the asset and liability portfolios are mismatched and when the Bank does not have the necessary flexibility to make a timely adjustment.
- The Bank is sensitive to this type of risk due to the mix of rates and terms for both assets and liabilities. Therefore, the Market Risk Division monitors this risk regularly and reports monthly on its performance to the Bank's Corporate Risk Committee.
- At the March 2015 close, the interest rate risk indicator in local and foreign currency closed considerably below SUGEF's regulatory maximum limit of 5%, at 1.28% (March 2014: 0.12%), due to the change in the duration of equity (from 0.29 to 2.60) and 0.08% (March 2014: 0.06%), respectively. The interest rate risk indicator in foreign currency as of March 2015 was 0.08% (March 2014: 0.06%).

## Notes to Consolidated Financial Statements

Fair value hedge

Fair value hedges are recognized as follows:

- Gains or losses arising from valuation of the hedging instrument at fair value are recognized immediately in profit or loss for the period.
- Gains or losses arising from valuation of the primary instrument that are attributable to the hedged risk are booked as an adjustment to the carrying amount of the instrument and recognized immediately in profit or loss for the period.
- In 2013, five derivative instruments were formalized to hedge exposure to the LIBOR rate related to the issue of debt in U.S. dollars at a fixed rate, with the purpose of compensating for changes in fair value attributable to changes in such benchmark rate. Three of those instruments were formalized with the correspondent banks Bank of America, CitiBank, and JP Morgan Chase, fully covering the 10-year issue for a total of US\$500,000,000 and maturing on November 1, 2023. The remaining two derivatives were formalized with CitiBank and JP Morgan Chase, partially covering the 5-year issue for a total of US\$250,000,000 and maturing on November 1, 2018 (see note 5-b).
- For the Investment Fund Manager, interest rate risk in respect of cash flows and fair value are the risks that the future cash flows and the fair value of a financial instrument will fluctuate as a result of changes in market interest rates.
- For the Pension Fund Manager, the consolidated VaR –without including real estate funds- had a stable behavior in 2015, maintaining an average of 1.40%.
- As of April 2014 the Pension Fund Manager adopted the RIMER methodology to calculate the VaR of market risk. Consequently, the 2014 values calculated under this methodology are not comparable to those from prior periods (calculated under another methodology).
- For the Insurance Brokerage Firm, interest rate risk is the risk of losses in the value of a financial asset or liability arising from fluctuations in interest rates, when interest rates for financial assets and liabilities are mismatched, and when the Insurance Brokerage Firm does not have the necessary flexibility to make a timely adjustment.

## Notes to Consolidated Financial Statements

As of March 31, 2015, the interest rate terms for the Bank's assets and liabilities are matched as follows (differences between the recovery of assets and the maturity of liabilities):

	_							
		1 to 30	31 to 90	91 to 180	181 to 360	361 to 720	More than 720	Total
Local currency (LC)	_							
Investments	¢	31,089,864,494	18,558,410,394	43,713,984,275	89,858,473,839	136,145,962,292	144,772,425,147	464,139,120,441
Loan portfolio	_	117,115,735,567	59,331,212,907	57,372,170,313	80,736,007,103	137,466,071,285	1,525,666,039,517	1,977,687,236,692
Total recovery of rate-sensitive assets LC (A)	¢	148,205,600,061	77,889,623,301	101,086,154,588	170,594,480,942	273,612,033,577	1,670,438,464,664	2,441,826,357,133
Obligations with the public	¢	204,565,576,212	203,792,628,674	313,306,842,283	219,257,182,550	40,070,661,465	46,378,759,447	1,027,371,650,631
Obligations with BCCR	,	15,371	66,338	10,866,789	11,030,369	21,710,087	127,916,622	171,605,576
Obligations with financial entities LC	¢	76,356,391	706,308,959	152,656,917	358,611,386	665,518,376	2,423,993,654	4,383,445,683
Total maturity of rate-sensitive liabilities LC (B)	¢	204,641,947,974	204,499,003,971	313,470,365,989	219,626,824,305	40,757,889,928	48,930,669,723	1,031,926,701,890
LC difference, recovery of assets less maturity of liabilities (A - B)	¢	(56,436,347,913)	(126,609,380,670)	(212,384,211,401)	(49,032,343,363)	232,854,143,649	1,621,507,794,941	1,409,899,655,243
	_							
Foreign currency (FC)		0.065.044.050	20 720 607 226	60 145 555 225	164 007 220 457	100 267 500 462	100 461 061 644	651 060 205 152
Investments	¢	9,265,244,059	39,739,685,326	68,147,577,225	164,987,238,457	180,267,598,462	189,461,861,644	651,869,205,173
Loan portfolio Total recovery of rate-sensitive assets FC (C)		35,743,325,109	50,399,919,952 90,139,605,278	58,872,589,143	55,242,294,363 220,229,532,820	89,520,388,204	945,626,177,174 1,135,088,038,818	1,235,404,693,945
Total recovery of rate-sensitive assets FC (C)	Ç _	45,008,569,168	90,139,003,278	127,020,166,368	220,229,332,820	269,787,986,666	1,133,000,030,010	1,887,273,899,118
Obligations with the public	¢	88,081,182,048	164,521,826,239	168,835,678,969	56,807,250,142	5,184,218,545	539,675,996,079	1,023,106,152,022
Obligations with entities	•	2,283,999,730	1,450,671,032	1,447,029,654	2,922,651,707	110,145,540,207	133,504,210,271	251,754,102,601
Total maturity of rate-sensitive liabilities FC (D)	ď.	90,365,181,778	165,972,497,271	170,282,708,623	59,729,901,849	115,329,758,752	673,180,206,350	1,274,860,254,623
FC difference, recovery of assets less maturity of liabilities (C - D)	¢ _	(45,356,612,610)	(75,832,891,993)	(43,262,542,255)	160,499,630,971	154,458,227,914	461,907,832,468	612,413,644,495
Total recovery of rate-sensitive assets 1/ (A + C)	¢	193,214,169,229	168,029,228,579	228,106,320,956	390,824,013,762	543,400,020,243	2,805,526,503,482	4,329,100,256,251
Total recovery of rate-sensitive liabilities 2/ (B + D)	¢	295,007,129,752	370,471,501,242	483,753,074,612	279,356,726,154	156,087,648,680	722,110,876,073	2,306,786,956,513
LC + FC difference, recovery of assets less maturity of liabilities (item 1 – item 2)	¢	(101,792,960,523)	(202,442,272,663)	(255,646,753,656)	111,467,287,608	387,312,371,563	2,083,415,627,409	2,022,313,299,738

## Notes to Consolidated Financial Statements

As of March 31, 2014, the interest rate terms for the Bank's assets and liabilities are matched as follows (differences between the recovery of assets and the maturity of liabilities):

	_							
	_	1 to 30	31 to 90	91 to 180	181 to 360	361 to 720	More than 720	Total
Local currency (LC)	_							
Investments	¢	8,967,527,612	13,462,285,810	34,955,623,033	138,789,696,922	146,847,174,678	139,528,586,680	482,550,894,735
Loan portfolio	_	1,633,473,633,934	100,836,201,324	7,838,415,229	5,003,950,607	8,775,322,735	58,852,633,908	1,814,780,157,737
Total recovery of rate-sensitive assets LC (A)	¢	1,642,441,161,546	114,298,487,134	42,794,038,262	143,793,647,529	155,622,497,413	198,381,220,588	2,297,331,052,472
Obligations with the public	¢	237.606.054.450	164.036.508.510	331,321,442,695	171.062.653.354	16.043.188.301	27,738,208,439	947.808.055.749
Obligations with BCCR	۲	22,000,015,292	2,990,678	10.866,763	11.033.977	22,394,329	149.054.657	22,196,355,696
Obligations with financial entities LC		10,052,223,751	171,747,861	128,446,328	308,762,980	560,155,911	626,803,098	11,848,139,929
Total maturity of rate-sensitive liabilities LC (B)	¢	269,658,293,493	164,211,247,049	331,460,755,786	171,382,450,311	16,625,738,541	28,514,066,194	981,852,551,374
LC difference, recovery of assets less maturity of liabilities (A - B)	¢	1,372,782,868,053	(49,912,759,915)	(288,666,717,524)	(27,588,802,782)	138,996,758,872	169,867,154,394	1,315,478,501,098
. (79)								
Foreign currency (FC) Investments	_	832,783,295	17,702,717,027	30,436,474,512	100,162,847,282	86,857,256,966	151,612,291,454	207 (04 270 526
Loan portfolio	¢	1,075,929,774,905	41,569,234,469	7,819,717,227	1,109,358,374	7,389,923,808	84,107,896,882	387,604,370,536 1,217,925,905,665
Total recovery of rate-sensitive assets FC	-	1,073,929,774,903	41,309,234,409	7,019,717,227	1,109,336,374	1,369,923,606	04,107,090,002	1,217,923,903,003
(C)	¢	1,076,762,558,200	59,271,951,496	38,256,191,739	101,272,205,656	94,247,180,774	235,720,188,336	1,605,530,276,201
Obligations with the public	¢	97,592,468,521	144,998,309,182	149,311,360,508	33,701,442,550	2,139,502,386	534,028,502,286	961,771,585,433
Obligations with entities	۴	2,290,088,993	1.311.898.447	35,381,623,088	2.990.663.787	5,919,239,976	245,544,953,331	293,438,467,622
Total maturity of rate-sensitive liabilities FC (D)	¢	99,882,557,514	146,310,207,629	184,692,983,596	36,692,106,337	8,058,742,362	779,573455,617	1,255,210,053,055
FC difference, recovery of assets less maturity of liabilities (C - D)	¢	976,880,000,686	(87,038,256,133)	(146,436,791,857)	64,580,099,319	86,188,438,412	(543,853,267,281)	350,320,223,146
Total recovery of rate-sensitive assets 1/(A + C)	¢	2,719,203,719,746	173,570,438,630	81,050,230,001	245,065,853,185	249,869,678,187	434,101,408,924	3,902,861,328,673
Total recovery of rate-sensitive liabilities $2/(B+D)$	¢	369,540,851,007	310,521,454,678	516,153,739,382	208,074,556,648	24,684,480,903	808,087,521,811	2,237,062,604,429
LC + FC difference, recovery of assets less maturity of liabilities (item 1 – item 2)	¢	2,349,662,868,739	(136,951,016,048)	(435,103,509,381)	36,991,296,537	225,185,197,284	(373,986,112,887)	1,665,798,724,244

## Notes to Consolidated Financial Statements

## Currency risk

Pursuant to SUGEF Directive 24-00, an entity faces currency risk when the value of its assets and liabilities in foreign currency is affected by exchange rate variations and the amounts of the corresponding assets and liabilities are mismatched.

Starting May 2009, the Bank's Asset and Liability Committee decided to take a neutral foreign currency position, which has been ratified annually by the Corporate Risk Committee. The goal is to protect the Bank from any variation in the exchange rate. The Bank's foreign currency position is monitored daily by the Market Risk Division. Additionally, the Bank calculates the SUGEF currency risk indicator on a monthly basis. As of March 2015 that indicator was established at 0.14%, which is slightly above the 0.05% calculated for March 2014 and considerably below the regulatory maximum limit of 5%.

The Bank is exposed to currency risk when the value of its assets and liabilities in foreign currency is affected by variations in the exchange rate, which is recognized in the income statement.

#### *Investments in Europe*

- The Bank's Market Risk Division analyzes and follows-up on the investment portfolio on an ongoing basis through the Comprehensive Risk Assessment Report, which is submitted to the Corporate Risk Committee and the Board of Directors.
- For the portfolios denominated in international dollars and euros, the Bank periodically analyzes the portfolio's balance performance by currency, composition by issuer, term and yield, VaR, stress scenarios related to shifts in yield curves (sovereign yield curve in the euro area, sovereign yield curve in the U.S., and yield curve for the 6-month LIBOR rate), and accrued market valuation.

#### Investments in euros - Europe

• The investment portfolio denominated in euros amounts to €41 million as of March 2015 and represents 3% of the Bank's total investment portfolio, which is in line with the strategy for investment diversification and portfolio currency matching. This portfolio has remained relatively stable during the past year, ranging between €39 million and €43 million. The main issuers are The Netherlands (29%), France (21%), Germany (18%), and Belgium (12%). Of the portfolio, 5% corresponds to the European Investment Bank.

## Notes to Consolidated Financial Statements

- Most issuers comprising this portfolio are sovereign issuers with very high credit ratings.
- The VaR of fair value was 0.04% and the duration locates at 1.26 years.
- Of the portfolio, 94% bears interest at a fixed rate, 48% matures between 1 and 2 years, while only 7% matures in more than 3 years.
- As a result of the ongoing monitoring performed by the Market Risk Division regarding the situation in Europe, the strategy used to manage the portfolio is based on increased liquidity and reduced exposure of the most volatile instruments.

## *Investments in dollars - Europe*

- As of March 2015, the total balance of the portfolio denominated in international dollars is \$537 million. Of that amount, 33% (equivalent to \$178 million) corresponds to a component of European instruments. However, excluding the note issued by Barclays with underlying bonds issued by the Government of Costa Rica, the share in the portfolio decreases to 23%.
- In this case, the portfolio concentrates in instruments issued by sovereign issuers that are considered to have very high credit ratings, including Germany, Belgium, France, The Netherlands, England, etc.
- The Insurance Brokerage Firm is exposed to currency risk when the value of its assets and liabilities in U.S. dollars is affected by exchange rate variations. The effect of this risk is recognized in the income statement.
- For the Insurance Brokerage Firm, currency risk is the risk that the fair value or the future cash flows of a financial instrument may fluctuate as a result of variations in foreign exchange rates. The effect of this risk is recognized in the consolidated income statement.

# Notes to Consolidated Financial Statements

The assets and liabilities denominated in foreign currency are as follows:

		U.S.	dollars
	_	March 2015	March 2014
Assets:	_		
Cash and due from banks	US\$	502,044,472	906,683,178
Investments in financial instruments		1,226,747,236	656,805,934
Loan portfolio		2,399,210,917	2,319,137,218
Accounts and accrued interest receivable		516,947	389,457
Investments in other companies		95,705,883	86,046,485
Other assets	_	6,142,926	4,727,318
Total assets	US\$	4,230,368,381	3,973,789,590
Liabilities:			
Obligations with the public	US\$	2,206,294,107	2,143,071,768
Obligations with entities		1,867,847,107	1,820,021,170
Accounts payable and provisions		15,383,514	16,549,920
Other liabilities		16,432,071	19,181,206
Subordinated obligations	TTOO -	130,900,357	2,000,024,064
Total liabilities	US\$	4,236,857,156	3,998,824,064
(Deficit) excess of assets over liabilities in U.S. dollars	US\$	(6,488,775)	(25,034,474)
		Euro	
		March 2015	March 2014
Assets: Cash and due from banks Investments in financial instruments	€	13,646,713 42,975,178	15,793,488 45,713,609
Accounts and accrued interest receivable		-	11
Total assets	€_	56,621,891	61,507,108
Liabilities:			
Obligations with the public	€	51,342,834	51,055,114
Obligations with entities		7,124,111	6,898,787
Accounts payable and provisions		231,490	122,942
Other liabilities		9,000	
Total liabilities	€_	58,707,435	58,076,843
(Deficit) excess of assets over liabilities in euros	€	(2,085,544)	3,430,265

#### Notes to Consolidated Financial Statements

		DU		
		2014	2013	
Assets:	_	_		
Investments in financial instruments	DU	39,226,187	39,085,959	
Loan portfolio		39,789,462	49,966,962	
Total assets	DU	79,015,649	89,052,921	
Liabilities:				
Accounts payable and provisions	DU	1,061,274	1,128,782	
Other liabilities		27,151	8,590	
Total liabilities	DU	1,088,425	1,137,372	
Excess of assets over liabilities in DU	DU	77,927,224	87,915,549	

The Bank's net position is not hedged. However, the Bank considers its position to be acceptable and in compliance with the internal policy limits established by the Asset and Liability Committee.

As of March 31, 2015 and 2014, the financial statements show a net foreign exchange gain of  $$\phi$375,574,147$$  and  $$\phi$2,399,312,717$$ , respectively.

The value of financial assets and liabilities includes future interest to be earned in the corresponding time band.

For the Investment Fund Manager, currency risk is the risk of a decrease in an investor's purchasing power due to unexpected variations in foreign exchanges rates for the currencies in which the investor holds positions.

The investment funds managed by this subsidiary are currency specific, i.e. the assets and liabilities of the investment portfolios are denominated in the same currency. Additionally, the investment funds are managed as memoranda accounts rather than as liabilities.

For the Brokerage Firm, a significant change in the devaluation rate, depending on the magnitude of such change, could adversely impact the local market and, to a certain degree, counterparty risk in the stock market. Business units, together with the risk management department, monitor market changes on a daily basis and measure the impact of positions acquired on the Brokerage Firm's liquidity and equity based on simulations of extreme conditions.

#### Notes to Consolidated Financial Statements

The Brokerage Firm incurs currency risk mainly on cash and investments in U.S. dollars.

- In respect of its assets and liabilities denominated in U.S. dollars, the Brokerage Firm aims to ensure that its net exposure is maintained at an acceptable level by holding sufficient assets in U.S. dollars to be able to settle its liabilities in that currency.
- As of March 31, 2015, the Pension Fund Manager's assets of own funds represented by investments in U.S. dollars is less than 2%. Accordingly, the Pension Fund Manager's exposure to currency risk is practically nil.
- For each of the funds managed, the Comprehensive Risk Management Unit (UAIR) performs simulations of exchange rate variations and their effect on changes in the value of the assets managed and the share value.

## d) Operational risk

- Operational risk is the risk of losses resulting from inadequate or failed internal processes, personnel, information systems, and controls or from external events. This definition includes legal risk but excludes strategic, business, or reputational risks.
- The policy adopted by the Bank stipulates that all of the Bank's employees are inherently responsible for managing operational risk. The Bank's employees are also required at all times to comply with the policies, regulations, procedures, and controls applicable to their positions and to ensure that the Bank's institutional values, code of conduct, and ethics are adopted across all levels of the organization.

That policy is implemented through a comprehensive model with roles and responsibilities assigned to each level:

- Board of Directors: Approve and provide a general oversight of the operational risk management framework.
- Corporate Risk Committee: Analyze, validate, and authorize policies, best practices, limits, and strategies.
- General Risk Management: Implement the strategy.
- Operational Risk Management: Implement the strategy in coordination with the respective processes and areas.
- Monitoring and follow-up groups: Perform independent evaluations to determine the effectiveness of the management framework.
- Process owners: Implement and follow up on mitigating action.

#### Notes to Consolidated Financial Statements

- Process guardians: Update and adjust the process to the operating reality.
- Risk liaisons: Liaise with the Operational Risk Management to identify and assess risks, report events, etc.
- Heads of Business Areas and Support Units: Establish mitigating action and controls necessary to reduce operational risk.
- Officers: Apply procedures in job positions and support superior officers to mitigate risk.

One of the Bank's fundamental operational risk management principles is transparency, defined as the identification, documentation, and reporting of risk events in order to allow the Bank to adequately measure risk events and carry out any necessary corrective, preventive, and mitigation measures in a timely manner, including insurance where this is effective.

Also, the main activity in operational risk management is the assessment of risk in institutional processes by applying a specific methodology that controls the frequency, impact, and quality of identified risk events. The diagram below shows how such methodology is applied to institutional processes:



Upper management has defined operational risk limits that specifically measure the performance of risk management and total operating losses. These measurements are performed and reported to the upper levels on a monthly basis.

## Notes to Consolidated Financial Statements

- For legal risk, the Bank applies a model to estimate the EL and VaR of legal actions, considering the subject matter of the cases when calculating the likelihood of loss and a continuous model for the duration of the legal actions. Such model provides a direct estimate of the duration of each legal action in the corresponding court and the possible outcomes. The results thereof are used to address possible losses from unfavorable rulings.
- For IT risk, the critical systems supporting the business are identified. System availability is measured on a monthly basis, while risk maps are updated annually based on a methodology established for such purposes. Events affecting normal operations are identified, classified, and reported to the Bank's upper management through a periodic information system that determines risk exposure.
- For the Investment Fund Manager, operational risk is the risk of possible direct or indirect loss arising from Investment Fund Manager's processes, personnel, technology, and infrastructure, in addition to external factors other than credit, market, and liquidity risks such as those arising from legal and regulatory requirements and generally accepted standards of corporate behavior. Also, the Institutional Risk Assessment System (SEVRI) measures operating risk activities, which are weighted with other risk categories to determine a global rating for institutional risk.
- The Investment Fund Manager aims to manage operational risk so to avoid financial losses and damage to its reputation.
- The Investment Fund Manager has worked in the following six areas related to operational risk:
  - Identification: Tools have been developed to accurately identify the different risks associated with each of the Investment Fund Manager's fundamental processes. Each process was analyzed together with any related processes to formulate a risk portfolio for the entire company. As a first step, the risks included in that portfolio were grouped by type and by class.

## Notes to Consolidated Financial Statements

- Analysis: Using tools defined by international methods, the Investment Fund Manager analyzed the risks identified for each business unit and determined the degree of impact, the probability of occurrence, and the origin of each risk. In addition to this analysis, the Investment Fund Manager assesses aspects of the business that can affect risk such as its image, operations, income, human resources, etc.
- Measurement: Similar to the analysis mentioned above, each risk identified
  was assessed from two perspectives (its probability of occurrence and its
  potential impact) in order to determine which risks require the most attention
  and the formulation of action plans to be carried out in the event that the risk
  materializes. Such information is included in the Business Continuity Plan
  (PCN).
- Follow-up: Periodic assessments are made of the institutional risk map to identify changes that could increase or decrease the probability that risk events will occur in order to adapt the Investment Fund Manager's strategies to address areas in which risk exposures are considered unacceptable.
- Control: The Investment Fund Manager's strategies to control and mitigate the potential impact of different operational risks include contingent computer hardware, a redundant power infrastructure, personnel turnover, documentation of the activities performed by each position, specialized training, varied and continually open channels of communication, development of a general culture focused on operational controls, etc.
- Communication: Upper management informs employees of risk management trends and strategies as well the results of assessments through meetings with employees or announcements.

For the Brokerage Firm, operational risk is the risk of losses resulting from inadequate or failed internal processes, personnel, information systems, and internal controls or from external events.

Management of this risk is the responsibility of all business units within the Brokerage Firm and considers the following:

- identification of risk factors
- mapping of the Brokerage Firm's operational risks

## Notes to Consolidated Financial Statements

- operational risk database of information on risk events, including type, description, and number of events, business unit in which the event originated, date, and monetary loss incurred
- compliance with corporate governance practices and established conduct guidelines
- compliance with regulatory and other legal or contractual requirements applicable to the Brokerage Firm
- integrity, security, and availability of the Brokerage Firm's information technology (IT).

## Fair value of financial instruments

- Fair value estimates are made at a specific date, based on relevant market information and information concerning the financial instruments. These estimates do not reflect any premium or discount that could result from offering for sale a particular financial instrument at a given point in time.
- Estimates could vary significantly if changes are made to those assumptions. The following methods and assumptions were used by the Brokerage Firm to estimate the fair value of financial instruments:
- (a) The carrying amounts of cash and cash equivalents, accounts receivable, and accounts payable approximate fair value because of the short-term nature of these instruments.
- (b) Available-for-sale investments are booked at fair value. The fair values are based on quoted market prices or prices quoted by brokers. The fair values of held-to-maturity investments are estimated using discounted cash flow techniques.
- For the Insurance Brokerage Firm, operational risk is related to the quality of the information in the systems, since an error in entering the information may lead to failed processing or renewal of individual insurance policies.
- It is important to note that we are currently in the process of purchasing information systems, which implies a risk since the current information system process is not appropriate.

#### Notes to Consolidated Financial Statements

For the Pension Fund Manager, operational risk is the risk of possible direct or indirect loss arising from the Pension Fund Manager's processes, personnel, technology, and infrastructure, in addition to external factors other than credit, market, and liquidity risks. Operational risk is an inherent risk for the sector in which the Pension Fund Manager operates and for all of its main activities. It manifests as failures, errors, business interruptions, or inappropriate employee behavior, and may cause financial loss, penalties from regulatory authorities, or damage to the reputation of the Pension Fund Manager.

The primary responsibility for the development and implementation of controls to address operational risk is assigned to management in each business area. This responsibility is supported by the development of standards for the management of operational risk in the following areas:

- appropriate segregation of duties, including the independent authorization of transactions
- requirements for effective reconciliation and monitoring of transactions
- compliance with regulatory and other legal requirements
- communication and application of conduct guidelines or ethical standards
- monitoring of risks using measurement tools
- reporting of operational losses and proposed remedial actions
- comprehensive planning for resuming activities, including plans to restore key operations and internal and external support to ensure services are not interrupted
- personnel training
- development of risk mitigation activities, including security policies.

At the financial conglomerate level, the UAIR furnishes necessary operational risk results.

Compliance with the standards established by the Bank at the financial conglomerate level is supported by a program of periodic reviews undertaken by General and Internal Audit. The results of such reviews are discussed with the personnel of the Pension Fund Manager.

Legal risk: This risk focuses on the legal contingencies that result from the nature and operation of the industry when applying and interpreting pension's legislation and regulations. The Pension Fund Manager is provided with legal advice and agreements authorized by SUPEN.

## Notes to Consolidated Financial Statements

Risk management is comprised of three types of risk, namely:

- Contract risk: This risk is assumed when the Pension Fund Manager makes investments with its own funds or the funds it manages. Accordingly, the contracts must comply with the regulations in effect and the performance bond signed by the parties. To ensure that these actions are executed from a legal standpoint, measures are coordinated and backed by the Bank.
- Regulatory compliance risk: This risk refers to the scope and adoption of regulations in effect of the Pension Fund Manager. For such purposes, a Compliance Officer is in charge of reviewing in a systematic and comprehensive manner any departure from regulations. The UAIR analyzes and verifies the limits established by SUPEN in the Investment Regulations of the regulated entities.
- Litigation risk: The UAIR follows up monthly on the legal actions filed against the Pension Fund Manager. The legal actions must be timely communicated and fed by management into the database of the Bank's Legal Department. Mathematical models are then applied to estimate the amounts of EL and VaR.
- As of March 31, 2015 the Bank's General Risk Division presented the results of the calculation of the VaR of legal actions for the Pension Fund Manager. The amount to be provisioned is equivalent to an expected loss of ¢265.11 million. In addition, the Pension Fund Manager is a defendant in 5 lawsuits, all of which are at the court of first instance.

## Capital management

- Costa Rican banking legislation requires the financial conglomerate to maintain a capital surplus at all times (i.e. a ratio of one or higher obtained by dividing the sum of total transferable surpluses of each company in the conglomerate and the individual surplus of the controlling company by the absolute value of the sum of individual deficits).
- The capital surplus or capital deficit of the financial group or conglomerate is calculated as the individual surplus or deficit of the controlling company plus the transferable surpluses and minus the individual deficits of each company in the financial group or conglomerate.
- The individual surplus of each company in the financial conglomerate is calculated as the excess of the capital base over the respective minimum capital requirement for each type of company stipulated in the CONASSIF prudential standard.

#### Notes to Consolidated Financial Statements

Regulatory capital is analyzed with consideration for the following three areas:

Tier I capital: ordinary and preferred paid-in capital plus reserves.

- Tier II capital: calculated as the sum of equity adjustments for property revaluations up to a maximum of 75% of the adjustments to the fair value of available-for-sale financial instruments, additional paid-in capital, prior period retained earnings, and profit or loss for the period, less statutory deductions.
- Deductions: Investments in other companies and loans granted to the controlling entity of the same financial group or conglomerate are to be deducted from the sum of Tier I and Tier II capital.
- Risk-weighted assets: Assets and contingent liabilities are weighted according to the risk level established by regulations plus a price risk adjustment per capital requirements.
- The Bank's policy is to maintain a strong capital base so as to maintain a balance between share capital and return on investment. Throughout the year, the Bank has complied with capital requirements and no significant changes were made to its capital management.
- As of March 31, 2015 and 2014, the Bank's risk rating is at a normal level since its capital adequacy ratio is above the required 10% ratio.

## (44) <u>Contingencies</u>

As of March 31, 2015 and 2014, the Bank, Pension Fund Manager, and Investment Fund Manager are defendants in ordinary, labor, and criminal lawsuits. The legal actions filed are as follows:

	Number	of cases			Total estima	ited amount
	2015	2014	Phase		2015	2014
Bank	227	200	First instance	¢	236,950,380,719	251,102,310,796
	13	11	Second instance		10,360,571,098	321,437,577
	6	7	Appeal		6,750,214,000	7,006,148,000
	246	218	Subtotal	¢	254,061,165,817	258,429,896,373
Pension Fund Manager	3	1	First instance		265,110,324	10,766,800
Investment Fund Manager	0	1	Second instance		-	226,745
	249	220	Total (note 20)	¢	254,326,276,141	258,440,889,918

#### Notes to Consolidated Financial Statements

- As of March 31, 2015 and 2014, the legal actions filed against the Bank and its subsidiaries are booked in memoranda accounts under "Other contingencies pending litigation and lawsuits".
- As of March 31, 2015 and 2014, the Bank is a claimant in ordinary, labor, and criminal lawsuits, which outcome is uncertain and are not booked in the accounting records, as follows:

Number	of cases	_	Total estimated amount		
2014	2013	Phase		2014	2013
50	35	First instance	¢	699,776,420,934	1,084,080,399
1	1	Second instance	_	150,000,000	150,000,000
51	36	Total	¢	699,926,420,934	1,234,080,399

Disclosure of legal action filed against SUGEF

- Starting September 2013, the Bank implemented a credit strategy called "BN Vivienda 10", whereby the Bank assumes notary and independent appraiser fees and expenses related to loan formalization. Accordingly, the customer is not directly charged therefor; instead, such expenses are recovered during the term of the loan by adding an additional spread to the interest rate. Such expenses are accounted for under "Other operating expenses" (account No. 439-99).
- SUGEF's Chart of Accounts establishes that the aforementioned expenses are to be booked under account No. 182-99, "Deferred charges." However, the account's description indicates that expenses are to be deferred over a maximum term of 5 years. As a result, the Bank submitted Inquiry SGER-042-2013 to SUGEF on September 30, 2013 requesting an extension of the term established to book deferred expenses and income over the term of the loan, rather than solely over 5 years as prescribed by the regulations.
- SUGEF replied through Official Letter SUGEF 3020-20130748 dated December 16, 2013, which was received by the Bank on January 6, 2014, indicating that deferral of costs within the loan's effective yield was to be applied from January 2014, date from which the accounts are authorized because the accounting regulations do not permit or provide line items for such deferral.

#### Notes to Consolidated Financial Statements

- On January 8, 2014, the Bank filed a motion for reconsideration with an appeal to a higher court (GG-004-14) and suspension of the effects of the administrative act of Official Letter SUGEF 3020-201307148, requesting that the contested decision be reversed in every respect and reconsidered, as it causes serious or irreparable harm.
- Through Official Letter SUGEF 0180-2014 dated January 30, 2014, SUGEF dismissed the request for suspension of the effects of the administrative act. Accordingly, the Bank requested that precautionary measures be taken against SUGEF, which was upheld by the Administrative Litigation Court of the Second Judicial Circuit of San José. The judge granted SUGEF three days to reply. As of the date of the approval of the 2013 audited financial statements, a final decision was pending in respect of the precautionary measures requested by the Bank; consequently, the expenses derived from BN Vivienda 10 are deferred in the accounting records over 5 years.
- Through Official Letter SGRF 093-2014 dated March 25, 2014, the Bank provided justification for the deferral of expenses associated with BN Vivienda 10, which is applicable to income. Additionally, Official Letter SGRF 094-2014 dated March 25, 2014 complemented and expanded on Official Letter SGRF 093-2014.
- Through Official Letter SUGEF 0644-2014 dated March 28, 2014, SUGEF requested additional documentation, which was furnished by the Bank through Official Letter SGRF-112-2014 of April 2, 2014.
- Through Official Letter 1417-201400096 dated June 16, 2014, SUGEF summarized the events occurring from the date Inquiry SGER-042-2013 was submitted by the Bank and reached a conclusion based on the documents submitted in Official Letter DGF 095-2014 on April 21, 2014 in respect of additional documentation filed with SUGEF to prevent amendment of the audited financial statements as of December 2013, as follows:
- "In light of the preceding arguments, the motion for reconsideration filed against Official Letter SUGEF 3020-2013 of December 16, 2013 is upheld, permitting Banco Nacional de Costa Rica to defer direct and incremental costs incurred in connection with the "BN Vivienda 10" and "BN Vivienda" products, as established in subaccount 182-05, i.e. for the entire life of the loan. Additionally, the arguments included in Official Letter SUGEF 180-2014 dated January 30, 2014 are dismissed".

#### Notes to Consolidated Financial Statements

## (45) <u>Statutory allocations made to the Development Financing Fund (FOFIDE)</u>

The information included in this note is supplemental and based on unaudited figures.

In 2010, FOFIDE was created in accordance with article 31 of Law No. 8634 "Development Banking System Act", which stipulates that all State-owned banks, except BANHVI, shall create development financing funds. The objective of those funds is to provide financing to individuals and legal entities that present viable and feasible projects in conformity with the provisions of the aforementioned law and the regulations thereto.

The equity of the development financing funds is comprised, in accordance with article 32 of such law, of the following resources:

- 1. All State-owned banks, except BANHVI, must appropriate each year at least five percent (5%) of their net earnings after income taxes to the creation and strengthening of its own development funds. This notwithstanding, the Board of Directors of each State-owned bank may agree to make additional yearly contributions to those funds through a majority vote.
- 2. Donations and bequests from individuals or public or private institutions, both local and international.
- 3. Profits obtained through transactions executed with the above funds.
- SUGEF Directive 31-04, "Regulations on the Financial Reporting of Financial Entities, Groups, and Conglomerates", requires that banks that manage FOFIDEs include a balance sheet and an income statement for such funds in the notes to their financial statements.
- For purposes of establishing and strengthening development financing funds, all Stateowned banks shall transfer to their respective funds the amount corresponding to prior year earnings in the second quarter of each year. At that time, the development financing programs that have been approved by the Governing Board will start operations.

Assets corresponding to the statutory allocations made to FOFIDE are only booked in local currency.

## Notes to Consolidated Financial Statements

The unaudited financial information is as follows:

# Development Financing Fund Balance Sheet As of March 31, 2015 (With corresponding figures for 2014)

<u>Assets</u>		2015	2014
Loan portfolio	¢	10,357,302,748	11,312,857,233
Current		9,162,905,444	10,304,422,513
Past due		1,066,287,670	771,930,119
Legal collections		289,678,891	364,902,433
Accrued interest receivable		81,403,865	82,573,477
(Allowance for loan impairment)		(242,973,122)	(210,971,309)
Accounts receivable		1,741,617	2,839,465
Other assets		5,530,715,162	2,005,356,171
Total assets	¢	15,889,759,527	13,321,052,869
<u>Liabilities</u> Accounts payable and provisions	¢	21,784,588	21,970322
Other liabilities	۴	37,788,527	24,776,372
Total liabilities	¢	59,573,115	46,746,694
<u>Equity</u>			
Equity of FOFIDE (note 19-a)	¢	15,589,871,904	13,007,081,986
Income for the year		240,314,508	267,224,189
Total equity	¢	15,830,186,412	13,274,306,175
Total liabilities and equity	¢	15,889,759,527	13,321,052,869
Other debit memoranda accounts	¢	522,432,357	522,129,058

## Notes to Consolidated Financial Statements

# Development Financing Fund Income Statement For the year ended March 31, 2015 (With corresponding figures for 2014)

		2015	2014
Finance income	¢	294,791,943	302,482,027
Income from recovery of assets and decrease in provisions		2,823,831	5,333,014
Expenses for allowance for impairment of assets		(24,990,452)	(1,989,332)
Net finance income	_	272,625,322	305,825,709
Other operating income		4,007	10,284
Other operating expenses		(2,109,116)	(1,705,765)
Gross operating income		270,520,213	304,130,228
Administrative expenses		(30,205,705)	(36,906,039)
Income for the year	¢	240,314,508	267,224,189

# a. Loan portfolio

# i. Loan portfolio by sector

The loan portfolio by sector is as follows:

		March 2015	March 2014
Trade	¢	3,195,100,661	3,806,625,610
Services		2,910,454,136	3,041,616,846
Manufacturing and quarrying		545,662,778	620,918,811
Agriculture and forestry		1,300,980,584	1,442,615,620
Livestock, hunting, and fishing		1,248,812,740	1,360,497,499
Transportation and telecommunications		1,128,796,446	948,719,155
Tourism		189,064,660	220,261,524
Total direct loans		10,518,872,005	11,441,255,065
Accrued interest receivable		81,403,865	82,573,477
Allowance for loan impairment		(242,973,122)	(210,971,309)
Total	¢	10,357,302,748	11,312,857,233

## Notes to Consolidated Financial Statements

The annual interest rates on loans receivable are summarized below:

	2015		2014		
Currency	Rates	Average	Rates	Average	
Colones	8.00% to 16.30%	11.25%	8.16% to 14.05%	10.83%	

# ii. Loan portfolio by arrears

As of March 31, the loan portfolio by arrears is as follows:

		March 2015	March 2014
Current	¢	9,164,643,813	10,317,407,888
1 to 30 days		423,561,251	239,419,454
31 to 60 days		497,403,802	479,864,977
61 to 90 days		154,314,076	57,246,905
91 to 120 days		10,192,888	5,614,247
121 to 180 days		94,113,862	99,976,714
More than 180 days		174,642,313	241,724,880
Total	¢	10,518,872,005	11,441,255,065
Accrued interest receivable		81,403,865	82,573,477
Allowance for loan impairment		(242,973,122)	(210,971,309)
Total	¢	10,357,302,748	11,312,857,233

# iii. Loan portfolio by origin

The loan portfolio by origin is as follows:

	_	March 2015	March 2014
Loans originated by the Bank	¢	10,518,872,005	11,441,255,065
Total direct loans	¢	10,518,872,005	11,441,255,065
Accrued interest receivable		81,403,865	82,573,477
Allowance for loan impairment		(242,973,122)	(210,971,309)
Total	¢	10,357,302,748	11,312,857,233

## Notes to Consolidated Financial Statements

## iv. Past due loans

Past due loans, including loans in accrual status (for which interest is recognized on a cash basis) and unearned interest on those loans, are as follows:

		March 2015	March 2014
Past due loans in accrual status: 142 loans in 2015 (2014: 145 loans)	¢	1,064,787,670	771,930,119
Loans in legal collections: 54 loans in 2015, 2.75% of portfolio 2015 (2014: 43 loans, 3.19%)	¢	289,678,891	364,902,433
Total unearned interest	¢	3,721,770	3,553,569

In 2015, the Bank increased the "Finance income on non-accrual loans" account by &ppeq3,721,770 (2014: &ppeq3,553,569), as a result of the increase in loans receivable over 180 days past due in the loan portfolio generated by the statutory allocations to FOFIDE.

As of March 31, 2015, restructured loans amount to a total of  $$\phi 46,447,709$$  (2014:  $$\phi 70,208,043$ ).

The Bank classifies loans as past due when no principal or interest payments have been made by one day after the due date.

## v. Accrued interest receivable on loan portfolio

The accrued interest receivable is as follows:

		March 2015	March 2014
Current	¢	37,474,174	38,760,330
Past due		16,272,683	11,092,049
Legal collections		27,657,008	32,721,098
	¢	81,403,865	82,573,477

## Notes to Consolidated Financial Statements

# b. Risk management

## Credit risk

This is the risk that the borrower or issuer of a financial asset will fail to discharge an obligation, fully and on time, in accordance with the terms and conditions agreed upon at the time the financial asset was acquired. Credit risk is mainly related to the loan portfolio. The exposure to credit risk on those assets is represented by the carrying amount of the assets in the balance sheet.

At the balance sheet date, there are no significant concentrations of credit risk. The maximum exposure to credit risk is represented by the carrying amount of each financial asset.

Note March 2015 Loan portfolio	March 2014 11,441,255,065
Loan portfolio	11.441.255.065
	11.441.255.065
Principal 45-a ¢ 10,518,872,005	,,,
Accounts and accrued interest receivable 81,403,865	82,573,477
Carrying amount, gross 10,600,275,870	11,523,828,542
Allowance for loan impairment (242,973,122)	(210,971,309)
Carrying amount, net ¢ 10,357,302,748	11,312,857,233
Loan portfolio	
Total balances:	
A1 ¢ 8,535,753,384	9,609,290,297
A2 221,834,433	84,952,017
B1 666,151,739	596,110,233
B2 64,515,226	95,378,414
C1 272,753,757	290,707,001
C2 72,622,526	23,336,448
D 25,191,641	169,384,346
E 741,453,164	654,669,786
10,600,275,870	11,523,828,542
Structural allowance (subledger – database) (244,186,128)	(221,668,896)
Carrying amount, net $\phi = 10,356,089,742$	11,302,159,646

## Notes to Consolidated Financial Statements

Individually assessed loans with allowance:         March 2015         March 2014           A1         \$ 8,535,753,384         9,609,290,297           A2         221,834,433         84,952,017           B1         666,151,739         596,110,233           B2         64,515,226         95,378,414           C1         272,753,757         290,707,001           C2         72,622,526         23,336,448           D         25,191,641         169,384,346           E         741,453,164         654,669,786           10,600,275,870         11,523,828,542           Structural allowance (subledger – database)         (244,186,128)         (221,668,896)           Carrying amount, net         \$ 10,600,275,870         11,523,828,542           Allowance for loan impairment (database)         \$ (244,186,128)         (221,668,896)           (Excess) insufficiency of allowance over structural allowance         1,213,006         10,697,587           Carrying amount, net         10,357,302,748         11,312,857,233           Restructured loans         46,447,709         70,208,043			Direct		
allowance:         A1       ¢ 8,535,753,384       9,609,290,297         A2       221,834,433       84,952,017         B1       666,151,739       596,110,233         B2       64,515,226       95,378,414         C1       272,753,757       290,707,001         C2       72,622,526       23,336,448         D       25,191,641       169,384,346         E       741,453,164       654,669,786         I0,600,275,870       11,523,828,542         Structural allowance (subledger – database)       (244,186,128)       (221,668,896)         Carrying amount, net       ¢ 10,356,089,742       11,302,159,646         Carrying amount, gross       10,600,275,870       11,523,828,542         Allowance for loan impairment (database)       ¢ (244,186,128)       (221,668,896)         (Excess) insufficiency of allowance over structural allowance       1,213,006       10,697,587         Carrying amount, net       10,357,302,748       11,312,857,233		- -	March 2015	March 2014	
A1       ¢       8,535,753,384       9,609,290,297         A2       221,834,433       84,952,017         B1       666,151,739       596,110,233         B2       64,515,226       95,378,414         C1       272,753,757       290,707,001         C2       72,622,526       23,336,448         D       25,191,641       169,384,346         E       741,453,164       654,669,786         10,600,275,870       11,523,828,542         Structural allowance (subledger – database)       (244,186,128)       (221,668,896)         Carrying amount, net       ¢       10,356,089,742       11,302,159,646         Carrying amount, gross       10,600,275,870       11,523,828,542         Allowance for loan impairment (database)       ¢       (244,186,128)       (221,668,896)         (Excess) insufficiency of allowance over structural allowance       1,213,006       10,697,587         Carrying amount, net       10,357,302,748       11,312,857,233	Individually assessed loans with	·	_		
A2       221,834,433       84,952,017         B1       666,151,739       596,110,233         B2       64,515,226       95,378,414         C1       272,753,757       290,707,001         C2       72,622,526       23,336,448         D       25,191,641       169,384,346         E       741,453,164       654,669,786         10,600,275,870       11,523,828,542         Structural allowance (subledger – database)       (244,186,128)       (221,668,896)         Carrying amount, net       \$\frac{10,356,089,742}{244,186,128}\$       11,302,159,646         Carrying amount, gross       10,600,275,870       11,523,828,542         Allowance for loan impairment (database)       \$\frac{(244,186,128)}{(244,186,128)}\$       (221,668,896)         (Excess) insufficiency of allowance over structural allowance       1,213,006       10,697,587         Carrying amount, net       10,357,302,748       11,312,857,233	allowance:				
B1 666,151,739 596,110,233 B2 64,515,226 95,378,414 C1 272,753,757 290,707,001 C2 72,622,526 23,336,448 D 25,191,641 169,384,346 E 741,453,164 654,669,786 10,600,275,870 11,523,828,542 Structural allowance (subledger – (244,186,128) (221,668,896) Carrying amount, net ¢ 10,356,089,742 11,302,159,646  Carrying amount, gross 10,600,275,870 11,523,828,542 Allowance for loan impairment (database) (Excess) insufficiency of allowance over structural allowance Carrying amount, net 10,357,302,748 11,312,857,233	A1	¢	8,535,753,384	9,609,290,297	
B2 64,515,226 95,378,414 C1 272,753,757 290,707,001 C2 72,622,526 23,336,448 D 25,191,641 169,384,346 E 741,453,164 654,669,786 10,600,275,870 11,523,828,542 Structural allowance (subledger – (244,186,128) (221,668,896) Carrying amount, net ¢ 10,356,089,742 11,302,159,646  Carrying amount, gross 10,600,275,870 11,523,828,542 Allowance for loan impairment (database) (Excess) insufficiency of allowance over structural allowance Carrying amount, net 10,357,302,748 11,312,857,233	A2		221,834,433	84,952,017	
C1       272,753,757       290,707,001         C2       72,622,526       23,336,448         D       25,191,641       169,384,346         E       741,453,164       654,669,786         10,600,275,870       11,523,828,542         Structural allowance (subledger – database)       (244,186,128)       (221,668,896)         Carrying amount, net       \$\frac{10,356,089,742}{10,356,089,742}\$       11,523,828,542         Carrying amount, gross       10,600,275,870       11,523,828,542         Allowance for loan impairment (database)       \$\psi(244,186,128)\$       (221,668,896)         (Excess) insufficiency of allowance over structural allowance       1,213,006       10,697,587         Carrying amount, net       10,357,302,748       11,312,857,233	B1		666,151,739	596,110,233	
C2       72,622,526       23,336,448         D       25,191,641       169,384,346         E       741,453,164       654,669,786         10,600,275,870       11,523,828,542         Structural allowance (subledger – database)       (244,186,128)       (221,668,896)         Carrying amount, net       \$\frac{10,356,089,742}{10,356,089,742}\$       \$\frac{11,302,159,646}{11,302,159,646}\$         Carrying amount, gross       10,600,275,870       11,523,828,542         Allowance for loan impairment (database)       \$\frac{(244,186,128)}{(244,186,128)}\$       (221,668,896)         (Excess) insufficiency of allowance over structural allowance       1,213,006       10,697,587         over structural allowance Carrying amount, net       10,357,302,748       11,312,857,233	B2		64,515,226	95,378,414	
D	C1		272,753,757	290,707,001	
E 741,453,164 654,669,786 10,600,275,870 11,523,828,542	C2		72,622,526	23,336,448	
10,600,275,870       11,523,828,542         Structural allowance (subledger – database)       (244,186,128)       (221,668,896)         Carrying amount, net       \$\psi\$ 10,356,089,742       11,302,159,646         Carrying amount, gross       10,600,275,870       11,523,828,542         Allowance for loan impairment (database)       \$\psi\$ (244,186,128)       (221,668,896)         (Excess) insufficiency of allowance over structural allowance       1,213,006       10,697,587         Carrying amount, net       10,357,302,748       11,312,857,233	D		25,191,641	169,384,346	
Structural allowance (subledger – database)       (244,186,128)       (221,668,896)         Carrying amount, net       \$\psi\$ \frac{10,356,089,742}{10,356,089,742}\$       \frac{11,302,159,646}{11,302,159,646}         Carrying amount, gross       10,600,275,870       11,523,828,542         Allowance for loan impairment (database)       \$\psi\$ (244,186,128)       (221,668,896)         (Excess) insufficiency of allowance over structural allowance       1,213,006       10,697,587         Carrying amount, net       \frac{10,357,302,748}{10,357,302,748}       \frac{11,312,857,233}{11,312,857,233}	E	<u>-</u>	741,453,164	654,669,786	
database)       (244,186,128)       (221,668,896)         Carrying amount, net       \$\psi\$ \frac{10,356,089,742}{10,356,089,742}\$       \frac{11,302,159,646}{11,302,159,646}         Carrying amount, gross       10,600,275,870       11,523,828,542         Allowance for loan impairment (database)       \$\psi\$ (244,186,128)       (221,668,896)         (Excess) insufficiency of allowance over structural allowance       1,213,006       10,697,587         Carrying amount, net       \frac{10,357,302,748}{10,357,302,748}       \frac{11,312,857,233}{11,312,857,233}			10,600,275,870	11,523,828,542	
Carrying amount, gross Allowance for loan impairment (database)  (Excess) insufficiency of allowance over structural allowance Carrying amount, net  10,600,275,870 11,523,828,542 (221,668,896) 1,213,006 10,697,587 11,312,857,233	, g		(244,186,128)	(221,668,896)	
Allowance for loan impairment (database)  (Excess) insufficiency of allowance over structural allowance  Carrying amount, net  (244,186,128)  (221,668,896)  1,213,006  10,697,587	Carrying amount, net	¢	10,356,089,742	11,302,159,646	
Allowance for loan impairment (database)  (Excess) insufficiency of allowance over structural allowance  Carrying amount, net  (244,186,128)  (221,668,896)  1,213,006  10,697,587		=			
(database)       (244,186,128)       (221,668,896)         (Excess) insufficiency of allowance over structural allowance       1,213,006       10,697,587         Carrying amount, net       10,357,302,748       11,312,857,233	• •		10,600,275,870	11,523,828,542	
over structural allowance 1,213,006 10,697,387 Carrying amount, net 10,357,302,748 11,312,857,233	<u> </u>	¢	(244,186,128)	(221,668,896)	
	<del>-</del>	_	1,213,006	10,697,587	
Restructured loans 46,447,709 70,208,043	Carrying amount, net	<u>-</u>	10,357,302,748	11,312,857,233	
	Restructured loans	=	46,447,709	70,208,043	

Set out below is an analysis of the gross and net (of allowance for loan impairment) amounts of FOFIDE's individually assessed loans with allowance by risk rating according to SUGEF Directive 1-05:

		March 2015		
	_	Loans to customers		
		Gross	Net	
A1	¢	8,535,753,384	8,527,577,061	
A2		221,834,433	221,590,415	
B1		666,151,739	661,493,024	
B2		64,515,226	62,963,378	
C1		272,753,757	266,363,554	
C2		72,622,526	70,253,347	
D		25,191,641	23,033,089	
E		741,453,164	524,028,880	
	¢ _	10,600,275,870	10,357,302,748	

## Notes to Consolidated Financial Statements

	Ma	March 2014		
	Loans	to customers		
	Gross	Net		
A1	¢ 9,609,290,297	9,618,066,026		
A2	84,952,017	84,935,026		
B1	596,110,233	588,459,953		
B2	95,378,414	93,757,967		
C1	290,707,001	277,246,221		
C2	23,336,448	21,788,402		
D	169,384,346	143,466,665		
E	654,669,786	485,136,973		
	¢ 11,523,828,542	11,312,857,233		

# Restructured loans:

Restructured loans are as follows:

	_	March 2015	March 2014
Restructured loans	¢	46,447,709	70,208,043

# Risk ratings

The loan portfolio by borrower classification (including interest receivable) is as follows:

March 2015	March 2014
¢ 483,391,597	550,876,886
10,116,884,273	10,972,951,656
¢ 10,600,275,870	11,523,828,542
	¢ 483,391,597 10,116,884,273

## Notes to Consolidated Financial Statements

## Borrower classification

The loan portfolio by risk rating assigned to borrowers according to SUGEF Directive 1-05 is as follows:

Risk rating	<u>Arrears</u>		March 2015		March 2014
A1	30 days or less	¢	8,535,753,379		9,609,290,297
A2	60 days or less		221,834,433		84,952,017
B1	60 days or less		666,151,739		596,110,233
B2	60 days or less		64,515,226		95,378,414
C1	90 days or less		272,753,757		290,707,001
C2	90 days or less		72,622,526		23,336,448
D	120 days or less		25,191,641		169,384,346
E	More than 120 days or other factors		741,453,169		654,669,786
		¢	10,600,275,870	_	11,523,828,542

# Loan portfolio by sector

The concentration of the loan portfolio by sector is as follows:

Sector		March 2015	March 2014
Agriculture and forestry	¢	1,320,530,485	1,464,789,887
Livestock, hunting, and fishing		1,271,748,203	1,382,387,586
Manufacturing and quarrying		548,346,145	623,357,794
Trade		3,213,633,313	3,829,354,403
Transportation and telecommunications		1,135,794,916	953,067,543
Services		2,920,471,266	3,050,062,778
Tourism		189,751,542	220,808,551
	¢	10,600,275,870	11,523,828,542

# Loan portfolio by geographic area

The concentration of the loan portfolio by geographic area is as follows:

	March 2015	March 2014
Central America	¢ 10,600,275,870	11,523,828,542

## Notes to Consolidated Financial Statements

## Loan portfolio by type of guarantee

The loan portfolio by type of guarantee is as follows:

Guarantee	March 2015	March 2014
Back to back	¢ 4,082,096	14,224,505
Assignment of loans	87,590,569	31,233,958
Mortgage	6,098,230,340	6,692,188,710
Surety	2,815,334,914	3,378,374,525
Trust	85,497,936	131,637,111
Securities	61,390,126	100,882,038
Chattel mortgage	1,370,199,142	1,145,883,230
Other	77,950,747	29,404,465
	¢ 10,600,275,870	11,523,828,542

## Loan portfolio by individual borrower or economic interest group

The concentration of the loan portfolio by individual borrower or economic interest group is as follows:

Loan portfolio concentration		March 2015	March 2014
¢1 to ¢3,000,000	¢	1,234,140,761	1,510,551,065
¢3,000,001 to ¢15,000,000		4,722,157,870	5,144,635,161
¢15,000,001 to ¢30,000,000		2,360,828,039	2,304,492,868
¢30,000,001 to ¢50,000,000		1,537,511,801	1,693,667,931
¢50,000,001 to ¢75,000,000		745,637,399	870,481,517
	¢	10,600,275,870	11,523,828,542

## (46) Statutory allocations to the Development Credit Fund (FCD)

The information included in this note is supplemental and based on unaudited figures.

Starting March 15, 2013, in accordance with Law No. 8634 and 9034, the Bank is awarded 50% of the management of the FCD for a 5-year term, renewable for equal periods as of the signing of the management agreement. The FCD will be comprised of funds established under article 59 of IRNBS (Law No. 1644), as follows:

i. Private banks must maintain in the Bank and Banco de Costa Rica a balance of at least seventeen percent (17%) of total deposits of 30 days or less, after deducting the corresponding minimum cash reserve, in both local and foreign currency, for loans to State-owned banks. State-owned banks will pay those private entities an interest rate equivalent to fifty percent (50%) of the base deposit rate for the aforementioned funds.

## Notes to Consolidated Financial Statements

ii. Private banks must open at least four agencies or branches distributed throughout the Chorotega, Central Pacific, Brunca, Atlantic Huetar, and Northern Huetar regions for purposes of providing basic banking services (i.e. deposit-taking and lending). Additionally, private banks must maintain a balance of at least ten percent (10%) of total deposits of 30 days or less, after deducting the corresponding minimum cash reserve, in both local and foreign currency, for loans to be used in development programs selected through an executive order. The loans will bear interest at a rate not to exceed the base deposit rate calculated by BCCR for placements in colones and at the 1-month LIBOR rate for placements in foreign currency.

SUGEF Directive 31-04 requires that banks that manage the FCD include a balance sheet and income statement for such fund in the notes to their financial statements.

The unaudited financial information is as follows:

# Development Credit Fund Balance Sheets As of March 31, 2015 (With corresponding figures for 2014)

Assets:		March 2015	March 2014
Investments in financial instruments	¢	157,209,676,107	138,264,845,326
Loan portfolio			
Current		209,007,834	-
Past due		1,326,758	-
Accrued interest receivable		2,624,224	-
Allowance for loan impairment		(13,561,406)	-
Accounts receivable		4,792,632	15,472,049
Other assets		2,539,931,432	1,663,035,034
Total assets	¢	159,953,797,581	139,943,352,409
<u>Liabilities</u>	_	_	
Obligations with entities	¢	156,184,718,017	139,387,431,913
Accounts payable and provisions		78,783,197	8,813,270
Other liabilities		2,294,699,969	-
Total liabilities	¢	158,558,201,183	139,396,245,183
<u>Equity</u>	_	_	
Equity adjustments	¢	167,331,818	(23,655,984)
Prior period retained earnings		1,063,056,822	503,798,027
Profit for the year		165,207,758	66,965,183
Total equity	¢	1,395,596,398	547,107,226
Total liabilities and equity	¢	159,953,797,581	139,943,352,409
Other memoranda accounts	¢	21,303,931	-

## Notes to Consolidated Financial Statements

# Development Credit Fund Income Statement For the year ended March 31, 2015 (With corresponding figures for 2014)

	_	March 2015	March 2014
Finance income	¢	3,000,604,692	8,203,796,137
Finance expenses		(1,900,287,638)	(7,589,963,836)
Gross finance income		1,100,317,054	613,832,301
Loan impairment		(13,561,406)	-
Net finance income		1,086,755,648	613,832,301
Other operating expenses		(921,547,890)	(546,867,118)
Income for the year	¢	165,207,758	66,965,183

## a. <u>Investments in financial instruments</u>

Investments in financial instruments are as follows:

	March 2015	March 2014
¢	156,030,272,507	137,409,211,443
	1,179,403,600	855,633,883
¢	157,209,676,107	138,264,845,326
	March 2015	March 2014
¢	45,742,888,786	65,297,019,413
	-	16,405,655,250
	96,734,081,527	1,075,588,513
	142,476,970,313	82,778,263,176
	_	
	5,816,108,292	18,033,916,127
	-	28,357,512,340
	7,737,193,902	8,239,519,800
	13,553,302,194	54,630,948,267
_	1,179,403,600	855,633,883
¢	157,209,676,107	138,264,845,326
	¢	\$\psi\$ \begin{array}{cccccccccccccccccccccccccccccccccccc

## Notes to Consolidated Financial Statements

As of March 31, annual returns on investments in financial instruments are as follows:

Currency	March 2015	March 2014
Colones	6.20% a 10.58%	0.00% a 9.20%
U.S. dollars	0.38% a 5.00%	0.00% a 5.15%
Euros	0.02% a 3.62%	0.63%

As of March 31, 2014, the valuation of available-for-sale investments gave rise to an unrealized gain, net of deferred tax, in the amount of ¢21,914,541 (2014: loss of ¢29,713,001) which is booked under "Equity adjustments for valuation of available-for-sale investments".

## b. Loan portfolio

## i. Loan portfolio by sector

The loan portfolio by sector is as follows:

	March 2015	March 2014
Trade	12,553,523	3,806,625,610
Services	-	3,041,616,846
Manufacturing and quarrying	-	620,918,811
Agriculture and forestry	36,781,069	1,442,615,620
Livestock, hunting, and fishing	161,000,000	1,360,497,499
Transport and telecommunications	-	948,719,155
Tourism	-	220,261,524
Total direct loans	210,334,592	11,441,255,065
Accrued interest receivable	2,624,224	82,573,477
Allowance for loan impairment	(13,561,406)	(210,971,309)
Total loan portfolio	¢ 199,397,410	11,312,857,233

The annual interest rates on loans are as follows:

	March 2015		March 2014	
Currency	Rates	Average	Rates	Average
Colones	8.08% to 9.62%	8.26%	8.16% to 14.05%	10.83%

## Notes to Consolidated Financial Statements

## ii. Loan portfolio by arrears

The loan portfolio by arrears is as follows:

		March 2015	March 2014
Current	¢	209,007,834	10,317,407,888
1 to 30 days		1,326,758	239,419,454
31 to 60 days		-	479,864,977
61 to 90 days		-	57,246,905
91 to 120 days		-	5,614,247
121 to 180 days		-	99,976,714
181 days or more		-	241,724,880
Total	¢	210,334,592	11,441,255,065
Accrued interest receivable		2,624,224	82,573,477
Allowance for loan portfolio		(13,561,406)	(210,971,309)
Total loan portfolio	¢	199,397,410	11,312,857,233

## iii. Loan portfolio by origin

The loan portfolio by origin is as follows:

		March 2015	March 2014
Loans originated by the Bank	¢	210,334,592	11,441,255,065
Total direct loans	¢	210,334,592	11,441,255,065
Accrued interest receivable		2,624,224	82,573,477
Allowance for loan impairment		(13,561,406)	(210,971,309)
Total	¢	199,397,410	11,312,857,233

As of March 31, 2015, restructured loans amount to a total of ¢137,761,101.

# iv. Accrued interest receivable on loan portfolio

As of March 31, accrued interest receivable is as follows:

		March 2015	March 2014
On current loan portfolio	¢	2,608,020	38,760,330
On past due loan portfolio		16,204	11,092,049
On loan portfolio in judicial collections		-	32,721,098
	¢	2,624,224	82,573,477

## Notes to Consolidated Financial Statements

## c. <u>Obligations with entities</u>

As of March 31, obligations with entities correspond to balances of checking accounts held by private banks in the Bank, one of the Managing Banks of the FCD together with Banco de Costa Rica, as required by Official Letter CR/SBD-014-2013 issued by the Technical Secretariat of the Governing Board.

Obligations with entities bear interest equivalent to 50% of the base deposit rate for accounts in colones, 50% of the 1-month LIBOR rate for accounts in U.S. dollars, and 50% of the 1-month Euro-LIBOR rate for accounts in euros.

## d. Finance income

Finance income is as follows:

	March 20	15 March 2014
Accrued interest on investments in available- for-sale investment securities	1,562,67	7,357 1,038,831,868
Accrued interest on loan portfolio	3,18	2,193 -
Accrued interest on loans with other funds	2	2,532 -
Foreign exchange differences on other financial obligations	1,429,12	3,272 40,334,337
Foreign exchange differences on investments in financial instruments	5,58	8,472 7,090,401,740
Realized gain on available-for-sale financial instruments	-	34,228,193
Other sundry finance income	1	0,867 -
9	3,000,60	4,693 8,203,796,138

## e. Finance expenses

Finance expenses are as follows:

	_	March 2015	March 2014
Demand obligations with financial entities	¢	520,539,501	434,009,692
Foreign exchange differences on other financial obligations		-	7,065,386,820
Foreign exchange differences on investments in financial instruments		1,379,748,137	90,377,481
	¢	1,900,287,638	7,589,773,993
	_		

#### Notes to Consolidated Financial Statements

## f. Other operating expenses

Other operating expenses are as follows:

	March 2015	March 2014
Fees and commissions for brokerage services ¢	471,941	34,442,444
Fees and commissions for custodial services of financial instruments	18,936,874	12,920,593
Income tax (8%) on interest on investments in financial instruments	128,383,639	82,845,567
Transfer to FINADE (1)	773,755,436	416,658,514
¢	921,547,890	546,867,118

(1) The transfer to FINADE corresponds to 90% of the net (base) earnings of the FCD. Base earnings are calculated by deducting monthly expenses incurred by the FCD and net foreign exchange differences from net earnings, as stipulated in article 35 of Law No. 8634 published in Official Gazette No. 87 dated May 7, 2008 and article 104 of Executive Order No. 34901-MEIC-MAG published in Official Gazette No. 22 dated December 1, 2008. For the year ended March 31, 2015, the amount transferred to FINADE is allocated as follows: 45%, equivalent to ¢348,189,946 (2014: 62%, equivalent to ¢228,270,966) to FOFIDE; 30%, equivalent to ¢232,126,631 (2014: 37%, equivalent to ¢141,787,110) to the Surety Fund; and 25%, equivalent to ¢193,438,858.76 (2014: 1%, equivalent to ¢46,600,438) to the Development Services Fund. These amounts are deposited in the respective checking accounts.

## g. Risk management

## i. Market and liquidity risk management

The Market Risk Division identifies, measures, monitors, and analyzes the different types of risk to which the Bank's investments are exposed in order to ensure a timely, efficient, and effective management of market and liquidity risks.

Management of the FCD risk analysis is as follows:

#### Notes to Consolidated Financial Statements

## Portfolio composition

The Bank's management reviews the changes in the face value and composition of funds in investments based on their currency, rate, issuer, and term, as well as the detail of the main purchases and sales observed during a specified period. Additionally, a market concentration index (Herfindahl-Hirschman) is used to determine the level of concentration of the portfolios.

#### Return

An analysis is made of the RAROC, which measures investment portfolio management in respect of the risk assumed. It measures the gross rate of return by currency, gains on the sale and purchase of trading securities, and changes in the cumulative portfolio valuation. Management also uses the Sharpe Ratio, which is a risk-adjusted return indicator that determines whether the portfolio's returns are due to smart investment decisions or result from excess risk.

## Price risk

Currently, the Bank's management uses the Risk Manager module of the software OFSA (Oracle Financial Services Application). This module is used to calculate indicators such as VaR, which determines the maximum expected loss of a portfolio under normal market conditions, at a specific holding period and confidence level, based on the risk appetite of the portfolio investor or manager. Other techniques include duration and modified duration, which determine the price sensitivity of a security as a result of a change in interest rates, in the former case, and changes in yield upon maturity, in the latter case. Finally, stochastic fair values determine the present value of a portfolio's future cash flows using a simulated rate structure, to determine the economic value of the portfolio.

Internally, the Bank has its own methodology, developed by RiMeR, to perform calculations such as VaR (parametric and simulation methods) and conditional value at risk (CVaR). CVaR measures expected loss when the value of the portfolio exceeds VaR, is applicable to undiversified portfolios, and allows for a more effective reaction in situations of extreme risk exposure. One of the most innovative aspects of this methodology is the use of a two-factor rate model (G2++ model), as opposed to the traditional one-factor model used in simulation processes (Hull-White model). The G2++ model decomposes the short rate into two processes similar to those of the Hull-White model.

#### Notes to Consolidated Financial Statements

The cumulative valuation of the portfolio is monitored to identify the instruments with larger valuation gains and losses.

The VaR calculation could be performed as established in SUGEF regulations.

#### Interest rate risk

Similarly, stress scenarios are performed that examine the effect on the portfolios of simulated interest rate movements. These scenarios help determine the changes in fair value of the portfolio under adverse interest rate conditions.

#### Currency risk

Currency risk is the maximum expected loss in the present value for a specific holding period with a confidence level as a result of adverse movements in exchange rates. The internal modeling system, developed in the "Matlab" platform, is used for such purposes. This system helps determine the VaR of exchange rate, which multiplied by the currency positions held by the portfolio (whether long or short), provides the largest loss caused by exchange rate volatility.

A report on the local foreign currency market could be issued periodically that includes the VaR of exchange rate by currency, compliance with limits for foreign currency positions, changes in the local market, etc.

## Liquidity risk

The guidelines for identifying, measuring, and monitoring the Bank's liquidity risk are established in order to determine when the Bank is unable to face situations such as withdrawals, non-renewals of certificates of deposit, maturities of certificates, and other obligations, based on recovery of loans and investments, cash and due from banks, and other assets; or when assets may not be sold at a price close to market.

Particularly, in respect of investment liquidity, indicators like instrument marketability are analyzed to determine whether the instruments comprising the portfolio may be easily sold when the Bank presents liquidity needs that are not covered by liabilities or cash and due from banks.

#### Notes to Consolidated Financial Statements

- Balances of demand deposits and term certificates of deposit of the Financial-Accounting Information System (SIFCO) are used to analyze the duration indicator and determine the volatility of the balances within a specified period. That information also helps determine the VaR of liquidity, which measures the risk of unexpected withdrawals from accounts.
- Additionally, information from SUGEF's trial balances is used to calculate a comparative liquidity indicator to measure the Bank's ability to meet its short-term obligations. This indicator is used for comparative purposes with respect to the banking industry.

#### ii. Credit risk management

- The credit risk of a loan portfolio is measured when the loan is originated and when the loan is formalized. Risk at loan origination is measured using a score. Risk at loan formalization is measured individually using a performance score or rating or collectively through portfolio credit risk, which measures loan correlation through the influence of macroeconomic variables.
- When the Bank measures a formalized loan, it assigns an origination score to five main portfolios: Housing, Development, Consumer, Credit Cards, and Loans without Guarantor. These tools, which are applied since 2006 and are recalibrated at least once a year, were validated by Experian in 2008 and more recently in 2012 by Equifax.
- A performance score and rating are applied once a loan is granted. The performance score only considers the customer's payment behavior, thus providing probability of default assessments which lead to a rating (AAA, AA, A, B, C, D; an AAA rating is assigned to the best customers, while a D rating is assigned to customers with payment difficulties). The rating is issued monthly and is used for granting new loans to customers with an AAA, AA, or A ratings.
- Rating applies to large companies and combines the customer's payment behavior and financial information, thereby providing a more robust rating system. The rating scale is more extensive than the performance score (AAA, AA, A, BBB, BB, B, CCC, CC, C, D) because there is a greater diversity of customers. This rating is performed monthly and is used when originating new business loans.

#### Notes to Consolidated Financial Statements

- For credit risk management purposes, the Bank applies an internal model to estimate the loan portfolio's EL and VaR over a one-year holding period using the "Monte Carlo simulation" approach. Loan portfolio risks are assessed, controlled, and monitored on a monthly basis based on one-year projections (maximum loss with a confidence level of 99% over one year).
- This approach is applied using a computational system developed in "Matlab" software. Also, the credit risk model takes into consideration the impact of changes in macroeconomic variables (endogenous and exogenous) on the loan portfolio when determining systemic factors. Results are compared with prior-month estimates and historical trends (for comparison purposes, loan portfolio information is available for 2003 and thereafter).
- The Bank's loan portfolio is comprised of operations in various currencies, i.e. the Costa Rican colon, the U.S. dollar, and DU. Consequently, the VaR analysis is performed separately for each currency. The data is then consolidated to determine a maximum loss for the entire portfolio, expressed in colones. VaR is also calculated for each of the Bank's 13 economic activities, its credit card accounts, and the BN-Desarrollo portfolio.
- Various technical tools are used to provide other angles for the analysis, such as the performance of the portfolio in legal collections, concentration of the portfolio by economic activity, vintage analysis, stress testing, transition matrixes, and sensitivity analyses for new loans and/or follow-up. Accordingly, the Bank has developed specialized internal methodologies to model credit risk that quantify risk indicators and potential impacts on institutional development.
- The use of the above analyses has led to sound credit risk management practices that, along with tight control over loan collection, have helped to substantially improve the level of arrears in the loan portfolio.
- A quality management system was developed where all tasks are associated with a procedure that establishes promises of quality for each credit risk assessment report.
- At the balance sheet date, there are no significant concentrations of credit risk. The maximum exposure to credit risk is represented by the carrying amount of each financial asset.

# Notes to Consolidated Financial Statements

			Direct		
	<u>Note</u>		March 2015	March 2014	
Loan portfolio					
Principal	46-b	¢	210,334,592	-	
Accounts and accrued interest receivable		_	2,624,224		
Carrying amount, gross			212,958,816	-	
Allowance for loan impairment (accounting records)			(13,561,406)		
Carrying amount, net		¢	199,397,410		
Loan portfolio					
Total balances:					
A1		¢	71,171,807	-	
C1			141,787,009	-	
			212,958,816		
Structural allowance (subledger – database)			(13,644,373)	-	
Carrying amount, net		¢	199,314,443	-	
Individually assessed loans with allowance:					
A1		¢	71,171,807	_	
C1		¥	141,787,009	_	
			212,958,816		
Structural allowance (subledger – database)			(13.644.373)	_	
Carrying amount, net		¢	199,314,443	_	
Committee amount and a			212.059.916		
Carrying amount, gross			212,958,816 (13,644,373)	-	
Allowance for loan impairment (database)			(13,044,373)	-	
(Excess) insufficiency of allowance over structural allowance			82,967	-	
Carrying amount, net	46-b	¢	199,397,410	-	
Restructured loans	46-b	¢	137,763,101	-	

## Notes to Consolidated Financial Statements

## Risk ratings

The loan portfolio by borrower classification (including interest receivable) is as follows:

		March 2015	March 2014
Borrower classification:	_	_	
Group 1	¢	65,793,357	550,876,886
Group 2		147,165,459	10,972,951,656
	¢	212,958,816	11,523,828,542

## Borrower classification

The loan portfolio by risk rating assigned to borrowers according to SUGEF Directive 1-05 is as follows:

Risk rating	Arrears		March 2015	March 2014
A1	30 days or less	¢	71,171,807	9,609,290,297
A2	60 days or less	٧	-	84,952,017
B1	60 days or less		-	596,110,233
B2	60 days or less		-	95,378,414
C1	90 days or less		141,787,009	290,707,001
C2	90 days or less		-	23,336,448
D	120 days or less		-	169,384,346
E	Over 120 days or another factor		-	654,669,786
		¢	212,958,816	11,523,828,542

## Loan portfolio by sector

The concentration of the loan portfolio by sector is as follows:

Sector		March 2015	March 2014
Agriculture and forestry	¢	37,149,233	1,464,789,887
Livestock, hunting, and fishing		163,206,165	1,382,387,586
Manufacturing and quarrying		-	623,357,794
Trade		12,603,418	3,829,354,403
Transport and telecommunications		-	953,067,543
Services		-	3,050,062,778
Tourism	_	-	220,808,551
	¢	212,958,816	11,523,828,542

#### Notes to Consolidated Financial Statements

## Loan portfolio by geographic area

The concentration of the loan portfolio by geographic area is as follows:

	_	March 2015	March 2014
Central America	¢	212,958,816	11,523,828,542

## Loan portfolio by type of guarantee

The direct loan portfolio by type of guarantee is as follows:

Type of guarantee		March 2015	March 2014
Back to back		-	14,224,505
Assignment of loans	¢	24,092,453	31,233,958
Mortgage		148,134,851	6,692,188,710
Surety		36,707,604	3,378,374,525
Trust		-	131,637,111
Securities		-	100,882,038
Chattel mortgage		-	1,145,883,230
Other		4,023,908	29,404,465
	¢	212,958,816	11,523,828,542

## Loan portfolio by individual borrower or economic interest group

The concentration of the loan portfolio by individual borrower or economic interest group is as follows:

Loan portfolio concentration		March 2015	March 2014
¢1 to ¢3,000,000	¢	4,692,979	1,510,551,065
¢3,000,001 to ¢15,000,000		111,843,919	5,144,635,161
¢15,000,001 to ¢30,000,000		-	2,304,492,868
¢30,000,001 to ¢50,000,000		30,628,562	1,693,667,931
¢50,000,001 to ¢75,000,000		65,793,356	870,481,517
	¢	212,958,816	11,523,828,542

# Notes to Consolidated Financial Statements

The assets and liabilities in foreign currency are as follows:

	_	March 2015	March 2014
U.S. dollars			
Assets:			
Investments in financial instruments	US\$	183,912,116	157,177,335
Other assets	. <del>-</del>	4,065,299	1,456,441
Total assets	US\$ _	187,977,415	158,633,776
Liabilities:			
Obligations with entities	US\$	187,051,965	158,210,351
Total liabilities	US\$	187,051,965	158,210,351
Excess of assets over liabilities in U.S. dollars	US\$	925,450	423,425
		March 2015	March 2014
Euros			
Assets:			
Investments in financial instruments	€	3,230,493	3,215,472
Other assets		700,052	378,759
Total assets	€	3,930,545	3,594,231
Liabilities:			
Obligations with entities	€	3,845,467	3,636,695
Total liabilities	€	3,845,467	3,636,695
Excess (deficit) of assets over liabilities in		2,015,107	2,030,073
euros	€ 	85,078	(42,464)

# Notes to Consolidated Financial Statements

Assets and liabilities in local and foreign currency are as follows:

Local currency:         Financial instruments of BCCR – own resources         ¢         -         16,405,655,250           Financial instruments from the local nonfinancial public sector – own resources         34,151,302,406         34,461,706,792           Financial instruments from local financial entities – own resources         23,552,997,760         -           Accrued interest receivable associated to investments in financial instruments         199,397,409         -           Loan portfolio         199,397,409         -           Deferred tax         4,792,631         15,472,049           Balances with other departments         -         51,097,207,996           Total assets in local currency         58,598,321,774         102,373,872,786           Foreign currency:         11,591,586,286         30,835,312,266           Financial instruments from the local nonfinancial public sector – own resources         73,181,083,749         1,075,588,564           Financial instruments from local financial entities – own resources         461,611,283         33,901,959,876           Financial instruments from foreign financial entities – own resources         13,091,691,023         20,728,988,961           entities – own resources         489,572,032         461,802,917           Financial instruments from foreign financial entities – own resources         2,539,931,434         80,831,177,421 <th>Assets</th> <th>_</th> <th>March 2015</th> <th>March 2014</th>	Assets	_	March 2015	March 2014
Financial instruments from the local non-financial public sector – own resources         34,151,302,406         34,461,706,792           Financial instruments from local financial entities – own resources         23,552,997,760         -           Accrued interest receivable associated to investments in financial instruments         689,831,568         393,830,699           Loan portfolio         199,397,409         -           Deferred tax         4,792,631         15,472,049           Balances with other departments         -         51,097,207,996           Total assets in local currency         58,598,321,774         102,373,872,786           Foreign currency:         11,591,586,286         30,835,312,266           Financial instruments from the local non-financial public sector – own resources         73,181,083,749         1,075,588,564           Financial instruments from local financial entities – own resources         73,181,083,749         1,075,588,564           Financial instruments from central banks and foreign public sector entities – own resources         461,611,283         33,901,959,876           Financial instruments from foreign financial entities – own resources         13,091,691,023         20,728,988,961           Accrued interest receivable associated to investments in financial instruments         489,572,032         461,802,917           Balances with other departments         2,539,931,434<	Local currency:			
financial public sector – own resources         34,151,302,406         34,461,706,792           Financial instruments from local financial entities – own resources         23,552,997,760         -           Accrued interest receivable associated to investments in financial instruments         689,831,568         393,830,699           Loan portfolio         199,397,409         -           Deferred tax         4,792,631         15,472,049           Balances with other departments         -         51,097,207,996           Total assets in local currency         58,598,321,774         102,373,872,786           Foreign currency:         Financial instruments from the local non-financial public sector – own resources         11,591,586,286         30,835,312,266           Financial instruments from local financial entities – own resources         73,181,083,749         1,075,588,564           Financial instruments from central banks and foreign public sector entities – own resources         461,611,283         33,901,959,876           Financial instruments from foreign financial entities – own resources         13,091,691,023         20,728,988,961           Accrued interest receivable associated to investments in financial instruments         489,572,032         461,802,917           Balances with other departments         2,539,931,434         80,831,177,421           Total assets in foreign currency         101,3	Financial instruments of BCCR – own resources	¢	-	16,405,655,250
Accrued interest receivable associated to investments in financial instruments   199,397,409   -			34,151,302,406	34,461,706,792
Investments in financial instruments			23,552,997,760	-
Deferred tax $4,792,631$ $15,472,049$ Balances with other departments $ 51,097,207,996$ Total assets in local currency $58,598,321,774$ $102,373,872,786$ Foreign currency:Financial instruments from the local nonfinancial public sector – own resources $11,591,586,286$ $30,835,312,266$ Financial instruments from local financial entities – own resources $73,181,083,749$ $1,075,588,564$ Financial instruments from central banks and foreign public sector entities – own resources $461,611,283$ $33,901,959,876$ Financial instruments from foreign financial entities – own resources $13,091,691,023$ $20,728,988,961$ Accrued interest receivable associated to investments in financial instruments $489,572,032$ $461,802,917$ Balances with other departments $2,539,931,434$ $80,831,177,421$ Total assets in foreign currency $101,355,475,807$ $167,834,830,005$			689,831,568	393,830,699
Balances with other departments- $51,097,207,996$ Total assets in local currency $58,598,321,774$ $102,373,872,786$ Foreign currency:Financial instruments from the local nonfinancial public sector – own resources $11,591,586,286$ $30,835,312,266$ Financial instruments from local financial entities – own resources $73,181,083,749$ $1,075,588,564$ Financial instruments from central banks and foreign public sector entities – own resources $461,611,283$ $33,901,959,876$ Financial instruments from foreign financial entities – own resources $13,091,691,023$ $20,728,988,961$ Accrued interest receivable associated to investments in financial instruments $489,572,032$ $461,802,917$ Balances with other departments $2,539,931,434$ $80,831,177,421$ Total assets in foreign currency $101,355,475,807$ $167,834,830,005$	Loan portfolio		199,397,409	-
Total assets in local currency  Foreign currency:  Financial instruments from the local nonfinancial public sector – own resources  Financial instruments from local financial entities  – own resources  Financial instruments from central banks and foreign public sector entities – own resources  Financial instruments from foreign financial entities – own resources  Financial instruments from foreign financial entities – own resources  Financial instruments from foreign financial entities – own resources  Accrued interest receivable associated to investments in financial instruments  Balances with other departments  Total assets in foreign currency  58,598,321,774  102,373,872,786  30,835,312,266  73,181,083,749  1,075,588,564  461,611,283  33,901,959,876  489,572,032  461,802,917  101,355,475,807  167,834,830,005	Deferred tax		4,792,631	15,472,049
Foreign currency: Financial instruments from the local non- financial public sector – own resources Financial instruments from local financial entities – own resources Financial instruments from central banks and foreign public sector entities – own resources Financial instruments from foreign financial entities – own resources Accrued interest receivable associated to investments in financial instruments Balances with other departments Total assets in foreign currency  11,591,586,286 30,835,312,266 73,181,083,749 461,611,283 33,901,959,876 13,091,691,023 461,802,917 461,802,917 101,355,475,807 167,834,830,005	Balances with other departments		-	51,097,207,996
Financial instruments from the local non-financial public sector – own resources  Financial instruments from local financial entities – own resources  Financial instruments from central banks and foreign public sector entities – own resources  Financial instruments from central banks and foreign public sector entities – own resources  Financial instruments from foreign financial entities – own resources  Financial instruments from foreign financial entities – own resources  Financial instruments from foreign financial entities – own resources  Accrued interest receivable associated to investments in financial instruments  Balances with other departments  Total assets in foreign currency  11,591,586,286  73,181,083,749  461,611,283  33,901,959,876  13,091,691,023  461,802,917  461,802,917  101,355,475,807  167,834,830,005	Total assets in local currency		58,598,321,774	102,373,872,786
financial public sector – own resources  Financial instruments from local financial entities   – own resources  Financial instruments from central banks and foreign public sector entities – own resources  Financial instruments from foreign financial entities – own resources  Financial instruments from foreign financial entities – own resources  Financial instruments from foreign financial entities – own resources  Accrued interest receivable associated to investments in financial instruments  Balances with other departments  Total assets in foreign currency  11,591,586,286  73,181,083,749  461,611,283  33,901,959,876  13,091,691,023  461,802,917  461,802,917  101,355,475,807  167,834,830,005	Foreign currency:	•	_	
Financial instruments from local financial entities - own resources  Financial instruments from central banks and foreign public sector entities - own resources  Financial instruments from foreign financial entities - own resources  Financial instruments from foreign financial entities - own resources  Accrued interest receivable associated to investments in financial instruments  Balances with other departments  Total assets in foreign currency  73,181,083,749  461,611,283  33,901,959,876  13,091,691,023  20,728,988,961  489,572,032  461,802,917  101,355,475,807  167,834,830,005		¢	11,591,586,286	30,835,312,266
foreign public sector entities - own resources Financial instruments from foreign financial entities - own resources Accrued interest receivable associated to investments in financial instruments Balances with other departments Total assets in foreign currency  461,611,283 33,901,959,876 13,091,691,023 20,728,988,961 489,572,032 461,802,917 101,355,475,807 167,834,830,005	Financial instruments from local financial entities		73,181,083,749	1,075,588,564
Financial instruments from foreign financial entities - own resources  Accrued interest receivable associated to investments in financial instruments  Balances with other departments  Total assets in foreign currency  13,091,691,023 20,728,988,961 489,572,032 461,802,917 2,539,931,434 80,831,177,421 101,355,475,807 167,834,830,005			461,611,283	33,901,959,876
investments in financial instruments  Balances with other departments  2,539,931,434  Total assets in foreign currency  2,539,931,434  101,355,475,807  167,834,830,005	Financial instruments from foreign financial		13,091,691,023	20,728,988,961
Total assets in foreign currency 101,355,475,807 167,834,830,005			489,572,032	461,802,917
Total assets in foreign currency 101,355,475,807 167,834,830,005	Balances with other departments		2,539,931,434	80,831,177,421
	<u> •</u>	-		
	<u> </u>	¢		270,208,702,791

#### Notes to Consolidated Financial Statements

	_	March 2015	March 2014
Liabilities	_	_	
Local currency:			
Obligations for management of FCD	¢	55,365,421,112	51,514,733,724
Withheld taxes		1,300	-
Deferred tax		78,781,897	8,813,270
Deferred finance income		4,531	-
Reciprocal accounts		2,294,695,439	-
Balances with other departments	_	-	50,499,618,184
Total liabilities in local currency	_	57,738,904,279	102,023,165,178
Foreign currency:	_		
Obligations for management of FCD	¢	100,819,296,798	87,872,698,189
Interest payable on obligations with financial entities		106	-
Reciprocal accounts		-	79,765,732,198
Total liabilities in foreign currency	_	100,819,296,904	167,638,430,387
Total liabilities	¢	158,558,201,183	269,661,595,565

## (47) <u>Significant events</u>

#### a) Derivative financial instruments

Pursuant to the provisions of SUGEF Directive 9-08 "Regulations to Authorize and Execute Operations with Foreign Exchange Derivatives" approved by the Board of Directors of BCCR and as recorded in article 6 of the minutes of meeting No. 5566-2012 held on October 24, 2012, the Board of Directors of BCCR agreed to grant final authorization to the Bank to act as an intermediary in the Foreign Exchange Derivatives Market and trade forwards, FX Swaps, and Currency Swaps.

#### b) Audit by Tax Authorities - 2010, 2011, 2012, and 2013 periods

On May 21, 2014, the Bank was informed that the Tax Authorities were to perform an audit in respect of the 2010, 2011, 2012, and 2013 periods. Through Notice No. 1-10-015-14-077-011-03 and Notice No. 1-10-015-14-078-111-03 issued by the Large Taxpayer Administration, the Bank received the "Notification of the Start of the Tax Audit and Initial Information Requirements" for the 2012 and 2013 periods, which involves confirming the veracity of the tax returns filed. Additionally, on June 27, 2014, the periods to be audited were extended to include 2010 and 2011 through the "Notification of the Extension to the Tax Audit and Initial Information Requirements" (Notice No. 1-10-015-14-025-012-03 and Notice No. 1-10-015-14-016-121-03).

#### Notes to Consolidated Financial Statements

- On November 27, 2014, the Bank's management issued Document No. SGRF-397-2014 presenting management's technical and legal criteria that support its disagreement with the adjustments determined by the Large Taxpayer Administration, as a response to the "Provisional Regularization Proposal and Proposed Sanctioning Ruling Based on Article 81 of the Tax Code of Standards and Procedures (CNPT)".
- On January 9, 2015, the National Large Taxpayer Audit Subdirection issued Document No. 1-10-015-14-091-341-03, "Regularization Proposal", detailing the required tax adjustments or corrections to the tax base included in the tax returns filed by the Bank for the 2010, 2011, 2012, and 2013 tax periods. The total tax liability, interest thereon, and the corresponding penalties amount to ¢29,089,100,723, ¢9,036,647,719, and ¢11,286,519,808, respectively.
- On January 16, 2015, the Bank presented Official Letter SGR-012-2015 stating its disagreement with the "Regularization Proposal". Also, the Tax Authorities issued Notice No. 2-10-015-14-044-03 "Postponement of the Sanctioning Ruling", whereby the pronouncement of the sanctioning ruling is suspended until the Tax Authorities present the supporting jeopardy assessment of taxes. Additionally, Notice No. 1-10-015-14-038-03 "Postponement of the Jeopardy Assessment of Taxes" suspends the assessment process until the Constitutional Chamber issues a decision on the appeal claiming violation of constitutional rights against article 144 of CNPT (File No. 14-011798-0007-CO).
- The National Large Taxpayer Audit Subdirection issued Document No. SFGCN-020-15 dated January 19, 2015 (notified to the Bank on January 21, 2015), whereby it maintains its decision and confirms the actions taken.
- Notification No. D.J. 176-2015 ref. 365 of the Legal Department, dated February 3, 2015, reads as follows:
- "Therefore, as a result of the consultations, no legally-binding tax liability has been established for the Bank. For such purposes, an administrative act must be issued in respect of the jeopardy assessment of taxes, which is subject to the decision of the Constitutional Chamber of the Supreme Court of Justice in respect of the appeal against article 144. If the appeal is dismissed by the Constitutional Chamber, the debt will become immediately applicable, final, and a present obligation, due to the issue of the jeopardy assessment of taxes".

#### Notes to Consolidated Financial Statements

## (48) Other significant events

- *a- Dividends paid to the Bank* 
  - BN Corredora de Seguros, S.A.

Under article No. 2 of meeting No. 11.888 held on February 11, 2014, the Board of Directors agreed to authorize the distribution of dividends from retained earnings in accordance with Official letter SGRF-047-2014 dated February 6, 2014 in the amount of  $\phi$ 250 million.

BN Sociedad Administradora de Fondo de Inversión, S.A. – BN SAFI, S.A.

Under article No. 2 of meeting No. 11.887 held on February 11, 2014, the Board of Directors agreed to authorize the distribution of dividends from retained earnings in accordance with Official letter SGRF-047-2014 dated February 6, 2014 in the amount of &epsilon1.000 million.

• Puesto de Bolsa Sociedad Anónima - BN Valores, S.A.

Under article No. 2 of meeting No. 11.885 held on February 11, 2014, the Board of Directors agreed to authorize the distribution of dividends from retained earnings in accordance with Official letter SGRF-047-2014 dated February 6, 2014 in the amount of  $\phi$ 4,000 million.

• Operadora de Planes de Pensiones Complementarias Sociedad Anónima – BN Vital, S.A.

Under article No. 2 of meeting No. 11,886 held on February 11, 2014, the Board of Directors agreed to authorize the distribution of dividends from retained earnings in accordance with Official letter SGRF-047-2014 dated February 6, 2014 in the amount of  $\phi$ 333 million.

*b- Amendments to accounting regulations* 

Through Articles 8 and 5 of the minutes of meetings No. 1034-2013 and No. 1035-2013 held on April 2, 2013, CONASSIF upheld the amendments to SUGEF Directive 31-04 in respect of the financial statements and explanatory notes, SUGEF Directive 33-07 in respect of new accounts to be included in the financial reports, and SUGEF Directive 34-02 in respect of accounting regulations applicable to regulated entities. These amendments are effective starting January 1, 2014.

#### Notes to Consolidated Financial Statements

## (49) <u>Transition to International Financial Reporting Standards (IFRSs)</u>

- Through various resolutions, CONASSIF (the Board) agreed to partial adoption starting January 1, 2004 of IFRSs promulgated by the International Accounting Standards Board (IASB).
- In order to regulate application of those Standards, the Board issued the *Terms of the Accounting Regulations Applicable to Entities Regulated by SUGEF, SUGEVAL, SUPEN, and SUGESE and to Non-financial Issuers* (the Regulations) and approved a comprehensive revision of those Regulations on December 17, 2007.
- On May 11, 2010, the Board issued private letter ruling C.N.S. 413-10 to revise the Regulations, whereby regulated entities adopted IFRSs and the corresponding Interpretations issued by the IASB in effect as of January 1, 2008, except for the special treatment indicated in Chapter II of the Regulations.
- Subsequently, through Circular Letter C.N.S. 1034-08 dated April 4, 2013, the Board published a number of amendments to SUGEF Directive 31-04 "Regulations on the Financial Reporting of Financial Entities, Groups, and Conglomerates" in respect of presentation of annual financial statements, unaudited interim consolidated and unconsolidated financial statements prepared by the entity, and audited consolidated and unconsolidated financial statements. Also, the Board amended SUGEF Directive 34-02 "Accounting Regulations Applicable to Entities Regulated by SUGEF, SUGEVAL, SUPEN, and SUGESE" to adopt IFRSs in effect as of January 1, 2011, except for the special treatments indicated in Chapter II of the Regulations. These amendments are effective for annual reporting periods beginning on or after January 1, 2014.
- When the regulations issued by the Board differ from IFRSs, noncompliance with such IFRSs and the nature of the specific departure applicable to the entity must be disclosed for each reporting period.
- Pursuant to the Regulations, adoption of new IFRSs or Interpretations issued by the IASB, as well as any other revisions of IFRSs adopted will require the prior authorization of the Board.
- Following is a summary of some of the main differences between the accounting standards issued by the Board and IFRSs, as well as the IFRSs or Interpretations of the International Financial Reporting Interpretations Committee (IFRICs) yet to be adopted:

#### Notes to Consolidated Financial Statements

## a) IAS 1: Presentation of Financial Statements

The presentation of financial statements required by the Board differs in some respects from presentation under this Standard. Following are some of the most significant differences:

SUGEF standards do not allow certain transactions, such as clearing house balances, gains or losses on the sale of financial instruments, foreign exchange differences, income taxes, etc. to be presented on a net basis. Given their nature, IFRSs require those balances to be presented net to prevent assets and liabilities or profit or loss from being overstated.

Also, interest receivable and payable is presented in the main asset or liability account rather than as other assets or other liabilities.

#### b) Revised IAS 1: Presentation of Financial Statements

The revised Standard introduces the term "Statement of total comprehensive income", which represents changes in equity during a period other than those changes resulting from transactions with owners in their capacity as owners. Other comprehensive income may be presented in either a single statement of comprehensive income (effectively combining both the statement of operations and all non-owner changes in equity in a single statement) or in a separate income statement and statement of comprehensive income. Adoption of Revised IAS1 was mandatory for the 2009 financial statements. As of December 31, 2013, these changes had not been adopted by the Board; however, the approval of the amendments to SUGEF Directive 31-04 and SUGEF Directive 34-02 requires the aforementioned presentation for financial statements as of December 31, 2014.

## c) <u>IAS 7: Statement of Cash Flows</u>

The Board has only authorized preparation of the cash flow statement using the indirect method. The direct method is also acceptable under this Standard.

#### Notes to Consolidated Financial Statements

## d) <u>IAS 8: Accounting Policies, Changes in Accounting Estimates and Errors</u>

SUGEF authorized the booking of notices of deficiency received from Tax Authorities against prior period retained earnings under certain circumstances. The amendments to SUGEF Directive 34-02 eliminate the above treatment for notices of deficiency related to taxes and phase out the difference between IFRSs and the accounting regulations issued by the Board for financial statements as of December 31, 2014.

## e) <u>IAS 12: Income Taxes</u>

SUGEF's Chart of Accounts presents deferred income tax assets, liabilities, income, and expenses separately. IAS 12 permits presenting assets and liabilities on a net basis if the taxes are levied on the same taxable entity. In accordance with IAS 12, income or expenses must be presented on a net basis as part of total income tax.

## f) IAS 16: Property. Plant and Equipment

The Standard issued by the Board requires the revaluation of property through appraisals made by independent appraisers at least once every five years, eliminating the option to carry these assets at cost or to revalue other types of assets.

Additionally, SUGEF has allowed certain regulated entities to convert (capitalize) revaluation surplus into share capital. This Standard only permits realization of revaluation surplus through the sale or depreciation of the asset. As a result of this treatment, regulated entities must recognize the effect of any impaired fixed assets in profit or loss, since the effect cannot be credited to equity. Under this Standard, impairment is charged to revaluation surplus and any difference is recognized in profit or loss. The amendments to SUGEF Directive 31-04 and SUGEF Directive 34-02 eliminate the option of capitalizing the surplus derived from revaluation of assets for financial statements as of December 31, 2014.

Moreover, under IAS 16, depreciation continues on property, plant and equipment, even if the asset is idle. The Standard issued by the Board allows entities to suspend the depreciation of idle assets and reclassify them as foreclosed assets.

#### Notes to Consolidated Financial Statements

## g) <u>IAS 18: Revenue</u>

The Board has allowed regulated financial entities to recognize loan fees and commissions collected prior to January 1, 2003 as revenue. Additionally, the Board has permitted the deferral of 25%, 50%, and 100% of loan fees and commissions for transactions completed in 2003, 2004, and 2005, respectively. This Standard prescribes deferral of 100% of those fees and commissions over the loan term.

The Board has also allowed deferral of the net excess of loan fee and commission income minus expenses incurred for activities such as assessment of the borrower's financial position, evaluation and recognition of guarantees, sureties, or other collateral instruments, negotiation of the terms of the instrument, preparation and processing of documents, and settlement of the operation. This Standard does not allow deferral on a net basis of such income. Instead, it prescribes deferral of 100% of loan fee and commission income and permits the deferral of only certain incremental transaction costs, rather than all direct costs. Accordingly, when costs exceed income, loan fee and commission income may not be deferred in full, since the Board only allows the net excess of income over expenses to be deferred. This treatment does not conform to IAS 18 and IAS 39, which prescribe separate treatment for income and expenses (see comments on IAS 39). With the amendments to SUGEF Directive 31-04 and SUGEF Directive 34-02, the Board adopted the accounting treatment prescribed by IAS 18 and IAS 39 for fees and commissions and transaction costs. However, the following differences remain between the accounting standards issued by the Board and IAS 18 and IAS 39:

- The Board requires that fee and commission income be recognized as a liability and booked under "Deferred income" (liability) and incremental direct costs be amortized in "Deferred charges" (asset). Under IAS 39, fees and commissions and incremental costs are part of the amortized cost of financial instruments, rather than separate assets and liabilities.
- The Board requires that fee and commission income be deferred in "Other income" and costs be amortized in "Other expenses". Under IAS 18 and IAS 39, income and costs must be booked as part of "Finance income on financial instruments".
- The Board requires that the effective interest rate be calculated over the financial instrument's contractual life. Under IAS 39, the effective interest rate for financial instruments is calculated over their expected life (or over a shorter period, if appropriate).

#### Notes to Consolidated Financial Statements

 Under SUGEF regulations, in the event of issuance of a credit-related guarantee, deferred income and incremental costs pending deferral or amortization as of the issue date are not included in the instrument's amortized cost or the calculation of the foreclosed asset's carrying amount. As a result, upon issuance, fees and commissions pending deferral and costs pending amortization are booked in profit or loss for the period.

## h) <u>IAS 21: The Effects of Changes in Foreign Exchange Rates</u>

The Board requires that the financial statements of regulated entities be presented in colones as the functional currency.

## i) IAS 27: Consolidated and Separate Financial Statements

The Board requires that the financial statements of a parent be presented separately, measuring its investments by the equity method. Under this Standard, a parent is required to present consolidated financial statements. A parent need not present consolidated financial statements when the ultimate or any intermediate parent of the parent produces consolidated financial statements available for public use, provided certain other requirements are also met. However, in this case, this Standard requires that investments be accounted for at cost.

In the case of financial groups, the holding company must consolidate the financial statements of all of the companies of the group in which it holds an ownership interest of twenty-five percent (25%) or more, irrespective of control. For such purposes, proportionate consolidation should not be used, except in the consolidation of investments in joint arrangements.

Amended IAS 27 (2008) requires accounting for changes in ownership interests in a subsidiary, while maintaining control, to be recognized as an equity transaction. When an entity loses control of a subsidiary, any ownership interest retained in the former subsidiary is to be measured at fair value with the gain or loss recognized in profit or loss. This Standard became mandatory for 2010 financial statements. These amendments have not been adopted by the Board.

With the amendments to SUGEF Directive 31-04 and SUGEF Directive 34-02, savings and credit cooperatives and the Education Savings and Loan Association, as parents, are not required to consolidate the interim and annual audited financial statements of their investees, such as funeral homes and other entities not related to the financial and stock market sector; except for entities that own or manage the cooperatives' personal and real property, which must be consolidated.

#### Notes to Consolidated Financial Statements

## k) IAS 28: Investments in Associates

The Board requires consolidation of investments in companies in which an entity holds twenty-five percent (25%) or more ownership interest, irrespective of any considerations of control. Such treatment does not conform to IAS 27 and IAS 28.

## 1) Revised IAS 32: Financial Instruments - Presentation

The revised Standard provides new guidelines clarifying the classification of financial instruments as liabilities or equity (e.g. preferred shares). SUGEVAL determines whether issues fulfill the requirements of share capital.

m) <u>Amendments to IAS 32: Financial Instruments - Presentation and IAS 1:</u>

<u>Presentation of Financial Statements - Puttable Financial Instruments and Obligations Arising on Liquidation</u>

The amendments to the Standards require puttable instruments and instruments that impose on the entity an obligation to deliver to another party a *pro rata* share of the net assets of the entity only on liquidation to be classified as equity if certain conditions are met. These changes have not been adopted by the Board.

## n) IAS 37: Provisions. Contingent Liabilities and Contingent Assets

SUGEF prescribes recognition of a provision for possible losses on contingent assets. This type of provision is prohibited under this Standard.

## o) <u>IAS 38: Intangible Assets</u>

The commercial banks listed in article 1 of IRNBS (Law No. 1644) may present organization and installation expenses as an asset in the balance sheet. However, those expenses must be fully amortized on the straight-line method over a maximum of five years. Also, under SUGEF regulations, intangible assets must be amortized over five years. This is not in accordance with IAS 38.

## p) <u>IAS 39: Financial Instruments: Recognition and Measurement</u>

The Board requires that the loan portfolio be classified pursuant to SUGEF Directive 1-05 and that the allowance for loan losses be determined based on that classification. It also allows excess allowances to be booked. This Standard requires that the allowance for loan losses be determined based on a financial analysis of actual losses. This Standard also prohibits the booking of provisions for contingent accounts. Any excess allowance must be reversed in the income statement.

#### Notes to Consolidated Financial Statements

The revised Standard introduced changes with respect to classification of financial instruments, which have not been adopted by the Board. Those changes include the following:

- The option of classifying loans and receivables as available for sale was established.
- Securities quoted in an active market may be classified as available for sale, held for trading, or held to maturity.
- The "fair value option" was established to designate any financial instrument to be measured at fair value through profit or loss, provided a series of requirements are met (e.g. the instrument has been measured at fair value since the original acquisition date).
- The category of loans and receivables was expanded to include purchased loans and receivables that are not quoted in an active market.

Regular purchases and sales of securities are to be recognized using settlement date accounting only.

Depending on the type of entity, financial assets are to be classified as follows:

## *i*) Pooled portfolios

Investments in pooled investment funds, pension and mandatory retirement saving funds, similar trusts, and Demand Cash Management Accounts (OPABs) are to be classified as available for sale.

## *ii)* Own investments of regulated entities

Investments in financial instruments of regulated entities are to be classified as available for sale.

Own investments in open investment funds are to be classified as trading financial assets.

Own investments in closed investment funds are to be classified as available for sale.

Entities regulated by SUGEVAL and SUGEF may classify other investments in financial instruments as trading financial assets, provided there is an express statement of intent to trade them within 90 days from the acquisition date.

#### Notes to Consolidated Financial Statements

Banks regulated by SUGEF may not classify investments in financial instruments as held to maturity. The above classifications do not necessarily adhere to IAS 39.

The amendment to this Standard clarifies the existing principles that determine whether specific risks or portions of cash flows are eligible for designation in a hedging relationship. The amended Standard became mandatory for 2010 financial statements with retrospective application required. These amendments have not been adopted by the Board.

## q) <u>IAS 40: Investment Property</u>

This Standard allows entities to choose between the fair value model and the cost model to measure their investment property. The Standard issued by the Board only allows entities to use the fair value model to measure this type of assets except in the cases for which no clear evidence is provided to determine their fair value.

## r) Revised IFRS 3: Business Combinations

The revised Standard (2008) incorporates the following changes:

- The definition of a business has been broadened, which is likely to result in more acquisitions being treated as business combinations.
- Contingent consideration will be measured at fair value, with subsequent changes therein recognized in profit or loss.
- Transaction costs, other than share and debt issue costs, will be expensed as incurred.
- Any pre-existing ownership interest in the acquiree will be measured at fair value, with the gain or loss recognized in profit or loss.
- Any noncontrolling (minority) interest will be measured at either fair value or at its proportionate interest in the identifiable assets and liabilities of the acquiree, on a transaction-by-transaction basis.

The revised Standard became mandatory for 2010 financial statements with prospective application required. The Board adopted this Standard through the amendments to the accounting regulations in effect as of January 1, 2014. However, the Board established that a business combination between jointly controlled entities must consider assets and liabilities measured at fair value.

#### Notes to Consolidated Financial Statements

## s) <u>IFRS 5: Non-current Assets Held for Sale and Discontinued Operations</u>

The Board requires booking an allowance of one-twenty-fourth of the value of noncurrent assets classified as available for sale each month, so that if they are not sold within two years from acquisition, an allowance is recognized equivalent to 100% of the assets' carrying amount. This Standard requires that these assets be recorded at the lower of the carrying amount or fair value less costs to sell, discounted to the present value of the assets that will be sold in periods greater than one year. Accordingly, assets could be understated, with excess allowances.

## t) <u>Amendments to IFRS 7: Financial Instruments: Disclosures</u>

In March 2009, the IASB issued certain amendments to this Standard, which require enhanced disclosures about fair value measurements and liquidity risk in respect of financial instruments.

The amendments require that fair value measurement disclosures use a three-level fair value hierarchy that reflects the significance of the inputs used in measuring fair values of financial instruments. Specific disclosures are required when fair value measurements are categorized as Level 3 (significant unobservable inputs) in the fair value hierarchy. The amendments require that any significant transfers between Level 1 and Level 2 of the fair value hierarchy be disclosed separately, distinguishing between transfers into and out of each level. Furthermore, changes in valuation techniques from one period to another, including the reasons therefor, are required to be disclosed for each class of financial instruments.

Further, the definition of liquidity risk has been amended and it is now defined as the risk that an entity will encounter difficulty in meeting obligations associated with financial liabilities that are settled by delivering cash or another financial asset.

The amendments require disclosure of a maturity analysis for non-derivative and derivative financial liabilities, but contractual maturities are required to be disclosed for derivative financial liabilities only when contractual maturities are essential for an understanding of the timing of cash flows. For issued financial guarantee contracts, the amendments require the maximum amount of the guarantee to be disclosed in the earliest period in which the guarantee could be called. The Board adopted this Standard through the amendments to the accounting regulations in effect as of January 1, 2014.

#### Notes to Consolidated Financial Statements

## u) IFRS 9: Financial Instruments

- IFRS 9 replaces IAS 39, "Financial Instruments: Recognition and Measurement". IFRS 9 amends the classification and measurement requirements for financial instruments, including a new financial instrument impairment model based on the premise of providing for expected credit losses and the new guidelines on hedge accounting. IFRS 9 does not change the principles for financial instrument recognition and derecognition provided for under IAS 39.
- The Standard is effective for annual periods beginning on or after January 1, 2018. Early application is permitted. This Standard has not been adopted by the Board.

### v) IFRS 10: Consolidated Financial Statements

- This Standard provides a revised control definition and application guidance therefor. This Standard supersedes IAS 27 (2008) and SIC 12, "Consolidation Special Purpose Entities", and is applicable to all investees.
- Early application is permitted. Entities that apply this Standard early must disclose that fact and simultaneously apply IFRS 11, IFRS 12, IAS 27 (as amended in 2011), and IAS 28 (as amended in 2011).
- An entity is not required to make adjustments to the accounting for its involvement with an investee when entities that were previously consolidated or unconsolidated in accordance with IAS 27 (2008), SIC 12, and this Standard continue to be consolidated or continue not to be consolidated.
- When application of this Standard results in an investor consolidating an investee that is a business that was not previously consolidated, the investor must:
  - 1) determine the date when the investor obtained control of that investee on the basis of the requirements of this Standard
  - 2) measure the assets, liabilities and noncontrolling interests as if acquisition accounting had been applied from that date.
- If (2) is impracticable, then the deemed acquisition date must be the beginning of the earliest period for which retroactive application is practicable, which may be the current period.

#### Notes to Consolidated Financial Statements

The Standard is effective for annual periods beginning on or after January 1, 2013. Early application is permitted. This Standard has not been adopted by the Board.

## w) <u>IFRS 11: Joint Arrangements</u>

This Standard was issued in May 2011 with an effective date of January 1, 2013. The Standard addresses the inconsistencies in the accounting for joint arrangements and requires a single accounting treatment for interests in jointly controlled entities. This Standard has not been adopted by the Board.

## x) <u>IFRS 12: Disclosure of Interests in Other Entities</u>

This Standard was issued in May 2011 with an effective date of January 1, 2013. This Standard requires an entity to disclose information that enables users of financial statements to evaluate the nature and financial effects of its ownership interests in other entities, including joint arrangements, associates, structured entities, and "off-balance-sheet" activities. This Standard has not been adopted by the Board.

#### y) IFRS 13: Fair Value Measurement

This Standard was issued in May 2011 and clarifies the definition of fair value, establishes a single procedure for measuring fair value, and defines the measurements and applications required or permitted in IFRSs. This Standard is effective for annual periods beginning on or after January 1, 2013. Early application is permitted. This Standard has not been adopted by the Board.

#### z) IFRIC 10: Interim Financial Reporting and Impairment

This Interpretation prohibits the reversal of an impairment loss recognized in a previous interim period in respect of goodwill, an investment in an equity instrument, or a financial asset carried at cost. This Interpretation applies to goodwill, investments in equity instruments, and financial assets carried at cost from the date that an entity first applied the measurement criteria of IAS 36 and IAS 39 (i.e. January 1, 2004). The Board permits the reversal of allowances.

#### aa) IFRIC 12: Service Concession Arrangements

This Interpretation gives guidance on the accounting by operators for public-to-private service concession arrangements. This Interpretation applies to both:

• infrastructure that the operator constructs or acquires from a third party for the purpose of the service arrangement, and

#### Notes to Consolidated Financial Statements

• existing infrastructure to which the grantor gives the operator access for the purpose of the service arrangement.

This Interpretation became mandatory for annual periods beginning on or after July 1, 2009. The Board adopted this Standard through the amendments to the accounting regulations in effect as of January 1, 2014.

## bb) <u>IFRIC 13: Customer Loyalty Programs</u>

This Interpretation gives guidance on the accounting by entities that grant loyalty award credits to customers as part of a sales transaction which, subject to meeting any further qualifying conditions, the customers can redeem in the future for free or discounted goods or services. This Interpretation became mandatory for annual periods beginning on or after January 1, 2011. The Board adopted this Standard through the amendments to the accounting regulations in effect as of January 1, 2014.

# cc) <u>IFRIC 14: IAS 19 - The Limit on a Defined Benefit Asset, Minimum Funding Requirements and their Interaction</u>

This Interpretation applies to all post-employment defined benefits and other long-term employee defined benefits. Also, it considers the minimum funding requirements to fund a post-employment or other long-term defined benefit plan. It also addresses when a minimum funding requirements might give rise to a liability. This Interpretation became mandatory for annual periods beginning on or after January 1, 2011 with retrospective application required. The Board adopted this Standard through the amendments to the accounting regulations in effect as of January 1, 2014.

## dd) <u>IFRIC 16: Hedges of a Net Investment in a Foreign Operation</u>

This Interpretation allows entities that use the step-by-step consolidation method to choose an accounting policy that hedges currency risk to determine the amount of the cumulative foreign currency translation reserve that is reclassified to profit or loss on the disposal of a net investment in a foreign operation, which is equivalent to the amount that would have been reclassified had the entity used the direct method of consolidation. This Interpretation became mandatory for annual periods beginning on or after July 1, 2009. The Board adopted this Standard through the amendments to the accounting regulations in effect as of January 1, 2014.

#### Notes to Consolidated Financial Statements

## ee) IFRIC 17: Distributions of Non-cash Assets to Owners

This Interpretation gives guidance on the accounting of distributions of non-cash assets to owners at the beginning and end of the reporting period.

- If, after the end of a reporting period but before the financial statements are authorized for issue, an entity declares a dividend to distribute a non-cash asset, it must disclose:
  - a) the nature of the asset to be distributed
  - b) the carrying amount of the asset to be distributed as of the end of the reporting period
  - c) whether fair values are determined, in whole or in part, directly by reference to published price quotations in an active market or are estimated using a valuation technique, and the method used to determine fair value and, when a valuation technique is used, the assumptions applied.
- This Interpretation became mandatory for annual periods beginning on or after July 1, 2009. The Board adopted this Standard through the amendments to the accounting regulations in effect as of January 1, 2014.

## ff) <u>IFRIC 18: Transfers of Assets from Customers</u>

This Interpretation gives guidance on the accounting of transfers of items of property, plant and equipment by entities that receive such transfers from their customers. This Interpretation also applies to agreements in which an entity receives cash when that amount of cash must be used only to construct or acquire an item of property, plant and equipment and that the entity must then use the item either to connect the customer to a network or to provide the customer with ongoing access to a supply of goods or services, or to both. This Interpretation became mandatory for annual periods beginning on or after July 1, 2009. The Board adopted this Standard through the amendments to the accounting regulations in effect as of January 1, 2014.

#### Notes to Consolidated Financial Statements

## gg) <u>IFRIC 19: Extinguishing Financial Liabilities with Equity Instruments</u>

This Interpretation gives guidance on the accounting by an entity when the terms of a financial liability are renegotiated and result in the entity issuing equity instruments to a creditor of the entity to extinguish all or part of the financial liability. This Interpretation became mandatory for annual periods beginning on or after July 1, 2010. The Board adopted this Standard through the amendments to the accounting regulations in effect as of January 1, 2014.

## (50) Disclosure of economic impact of departure from IFRSs

Since the basis of accounting used by the Bank's management described in note 1-b differs from IFRSs, discrepancies may arise related to the balances of certain accounts.

The Bank's management has chosen not to determine the economic impact of those differences since they consider such determination impractical.

## (51) <u>2013 figures</u>

Certain 2013 figures have been restated for purposes of comparison with the 2014 figures, as presented below.

Pursuant to articles 8 and 5 of the minutes of meetings No. 1034-2013 and No. 1035-2013, respectively, held on April 2, 2013, CONASSIF informed through Notice C.N.S. 1034-08 dated April 4, 2013 of the agreement reached to amend the income statement model included in SUGEF Directive 31-04, requiring the following modification:

• For the year ended December 31, 2014, foreign exchange gains and losses are presented under finance income and finance expenses, respectively. In the 2013 financial statements, those figures were presented on a net basis as foreign exchange gains in the amount of  $\&xi_1$ 2,518,326 (see note 1-d).