BANCO NACIONAL DE COSTA RICA

Financial Information required by the
Superintendency General of Financial Entities

Separate Financial Statements

As of December 31, 2021
(With corresponding figures for 2020)

(With Independent Auditors' Report Thereon)

(Translation into English of the original
Independent Auditors' Report issued in Spanish)

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Independent Auditors' Report

To the Board of Directors of Banco Nacional de Costa Rica

Opinion

We have audited the separate financial statements of Banco Nacional de Costa Rica (the Bank), which comprise the separate statement of financial position as of December 31, 2021, and the separate statements of comprehensive income, changes in equity, and cash flows for the year then ended, and notes, comprising significant accounting policies and other explanatory information.

In our opinion, the accompanying separate financial statements present fairly, in all material respects, the unconsolidated financial position of the Bank as of December 31, 2021, and of its unconsolidated financial performance and its unconsolidated cash flows for the year then ended in accordance with the financial reporting provisions of the accounting regulations issued by the National Financial System Oversight Board (CONASSIF) and the Superintendency General of Financial Entities (SUGEF).

Basis for Opinion

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

Emphasis of Matter – Basis of Accounting

We draw your attention to Note 2-a to the separate financial statements, which describes the basis of accounting. The separate financial statements have been prepared in accordance with the financial reporting provisions issued by CONASSIF and SUGEF. As a result, the separate financial statements may not be suitable for other purposes. Our opinion has not been modified in this regard.

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Key Audit Matters

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

The key audit matter	How the matter was addressed in our audit
1. Valuation of derivative financial instruments	
The Bank has derivative financial instruments, which are valued through the application of valuation techniques that often entail the use of judgments, estimates and assumptions.	Our procedures in this area included: • involving our specialists to determine the value of financial instruments, based on the methodologies used for the valuation of financial instruments and the inputs provided by the Bank. • for all derivative instruments, assessing that the Bank's valuations fall within a reasonable range, compared to the valuations derived from our valuation model, considering the inherent uncertainties disclosed in the financial statements; • submitting confirmations to the financial entities with which the Bank holds derivative financial instruments.
2. Compliance with the regulation to determine the allowance for loan losses	
We have established compliance with SUGEF Directive 1-05, Regulations for Borrower Classification, which provides guidelines to determine the allowance for loan losses, as a key audit matter (see note 6). According to this regulation, the allowance for loan losses is determined through the application of pre-established percentages to each borrower, according to their risk rating, which considers the days of arrears, creditworthiness, and historical payment behavior.	Our procedures in this area included: • assessing the design and operating efficiency of IT controls on the information systems used by the Bank's management to calculate arrears in the loan portfolio; performing detailed testing of the entire loan portfolio to confirm the days of arrears; • testing the transfer of data between the interfaces of the loan information systems and the systems used by the Bank to determine the borrower classification and to calculate the allowance for loan losses;

The elements to be considered as basis for the allowance are: the balance of the loan for each borrower, current interest, and stand-by credits. The allowance percentage is applied to the net balance not covered by collaterals eligible for risk mitigation, in conformity with the mitigation percentages established in the aforementioned regulation.	• recalculating the minimum allowance for loan losses on direct loans and stand-by credits, based on the information furnished by the Bank's management; testing the integrity of data for this information; • performing detailed testing of a sample of borrowers, to confirm whether the Bank's management complied with the analysis of creditworthiness required by the regulation, as well as the assessment of the collaterals that can be used to mitigate credit risk. This procedure included an assessment of the work performed by external experts on the valuation of collaterals; • comparing the level of historical payment behavior used by the Bank's management with the information provided by SUGEF's Credit Information Center. • recalculating and comparing the risk rating assigned by the Bank's management (recorded in the credit subledger) to KPMG's recalculation.

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

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

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

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

Auditors' Responsibilities for the Audit of the Separate Financial Statements

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

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

- Identify and assess the risks of material misstatement of the separate financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.

- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's ability to continue as a going concern. If we conclude that a material uncertainty exists, then we are required to draw attention in our auditors' report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Bank to cease to continue as a going concern.

- Evaluate the overall presentation, structure, and content of the separate financial statements, including the disclosures, and whether the separate financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

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

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

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

KPMG

February 25, 2022

San José, Costa Rica
Mynor Pacheco Solano.
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BANCO NACIONAL DE COSTA RICA
SEPARATE STATEMENT OF FINANCIAL POSITION
AS OF DECEMBER 31, 2021
(With corresponding figures for 2020)
(In colones)

	Note	2021	2020
ASSETS			
Cash and due from banks	9	1,352,823,921,973	1,379,990,856,795
Cash		153,014,952,805	99,373,332,328
BCCR		747,172,912,300	820,838,555,641
Local financial entities		278,604,430	163,009,394
Foreign financial entities		322,986,140,689	452,192,501,800
Notes payable on demand		7,097,413,624	6,280,622,565
Restricted cash and due from banks		122,273,898,125	1,142,835,067
Investments in financial instruments	10	1,722,547,231,475	1,316,219,293,560
Fair value through profit or loss		33,238,828,201	18,172,405,610
Fair value through other comprehensive income		751,540,811,170	694,570,329,421
Amortized cost		913,789,586,706	571,735,269,007
Derivative financial instruments	11	7,723,704,438	15,753,371,710
Accrued interest receivable		18,845,785,134	18,334,204,657
(Allowance for impairment of investments in financial instruments)		(2,591,484,174)	(2,346,286,845)
Loan portfolio	12	4,477,434,448,101	4,296,577,338,170
Current		4,282,160,940,971	4,116,568,006,084
Past due		209,954,545,122	168,249,547,245
In legal collection		42,215,104,572	73,894,840,291
Direct incremental costs related to loans		3,675,079,715	3,756,519,754
(Deferred income on loan portfolio)		(35,117,407,652)	(33,106,164,873)
Accrued interest receivable		110,377,468,668	122,742,551,278
(Allowance for loan losses)		(135,831,283,295)	(155,527,961,609)
Accounts and fees and commissions receivable	13	747,273,470	924,298,584
Commissions receivable		552,182,422	293,377,460
Accounts receivable for transactions with related parties		29,395,888	419,031,096
Deferred tax and income tax receivable		141,325,587	143,613,342
Other receivables		4,029,379,663	4,216,574,443
Accrued interest receivable		1,923,294	2,991,594
(Allowance for impairment of accounts and fees and commissions receivable)		(4,006,933,384)	(4,151,289,351)
Available-for-sale assets	14	35,788,800,197	32,365,899,015
Assets and securities acquired in lieu of payment		94,628,393,958	98,844,527,473
Other available-for-sale assets		55,884,629	55,884,629
(Allowance for impairment of foreclosed assets and per legal requirements)		(58,895,478,390)	(66,534,513,087)
Investments in other companies, net	15	124,465,643,338	117,705,861,796
Property and equipment, net	16	207,718,160,856	211,802,700,957
Other assets	17	57,529,344,003	83,067,044,002
Deferred charges		28,728,197,092	43,299,599,540
Intangible assets		8,680,579,540	4,704,324,311
Other assets		20,120,567,371	35,063,120,151
TOTAL ASSETS		7,979,054,823,413	7,438,653,292,879

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

Continued...

BANCO NACIONAL DE COSTA RICA
SEPARATE STATEMENT OF FINANCIAL POSITION
AS OF DECEMBER 31, 2021
(With corresponding figures for 2020)
(In colones)

LIABILITIES AND EQUITY	Note	2021	2020
LIABILITIES			
Obligations with the public	18	6,097,748,047,773	5,626,184,517,289
Demand obligations		4,369,258,152,185	3,553,063,486,246
Term obligations		1,701,120,048,148	2,036,536,524,256
Finance charges payable		27,369,847,440	36,584,506,787
Obligations with BCCR	19	168,243,245,539	8,126,311,079
Term obligations		167,292,072,120	8,125,644,412
Finance charges payable		951,173,419	666,667
Obligations with entities	20	788,639,036,301	902,082,561,970
Demand obligations		113,773,573,821	66,111,393,172
Term obligations		671,752,495,344	830,905,328,172
Other obligations with entities		(51,811,794)	(49,567,474)
Finance charges payable		3,164,778,930	5,115,408,100
Accounts payable and provisions		107,563,986,658	97,977,816,389
Provisions	22	21,329,839,856	28,467,752,780
Deferred tax	21-b	15,044,853,608	13,994,564,857
Other sundry accounts payable	23	71,189,293,194	55,515,498,752
Other liabilities	24	26,976,144,045	37,052,115,138
Deferred income		88,200,061	72,347,267
Other liabilities		26,887,943,984	36,979,767,871
Subordinated obligations	25	58,367,371,894	60,950,013,196
Subordinated obligations		57,427,250,000	59,878,100,000
Finance charges payable		940,121,894	1,071,913,196
TOTAL LIABILITIES		7,247,537,832,210	6,732,373,335,061
EQUITY			
Share capital		172,237,030,102	172,237,030,102
Paid-in capital	26-a	172,237,030,102	172,237,030,102
Equity adjustments - Other comprehensive income		93,316,808,915	87,897,038,178
Reserves	26-b	364,737,238,098	381,362,590,326
Prior-period retained earnings		40,386,334,461	11,005,359,016
Income for the year		19,152,075,605	14,734,575,073
Capital contributions or special funds	26-c	41,687,504,022	39,043,365,123
TOTAL EQUITY		731,516,991,203	706,279,957,818
TOTAL LIABILITIES AND EQUITY		7,979,054,823,413	7,438,653,292,879
DEBIT MEMORANDA ACCOUNTS	27	499,131,273,356	481,255,103,256
TRUST ASSETS	28	2,994,750,018,838	2,000,959,828,942
TRUST LIABILITIES		125,311,724,591	138,640,543,689
TRUST EQUITY		2,869,438,294,247	1,862,319,285,253
TRUST MEMORANDA ACCOUNTS		212,404,697,232	159,148,835,925
OTHER DEBIT MEMORANDA ACCOUNTS	29	26,924,093,940,397	22,998,578,779,433
Own debit memoranda accounts		9,158,504,380,716	8,297,360,887,164
Third-party debit memoranda accounts		1,742,711,823,628	1,520,637,448,493
Own debit memoranda accounts for custodial activities		647,586,882,558	616,184,560,408
Third-party debit memoranda accounts for custodial activities		15,375,290,853,495	12,564,395,883,368

Bernardo Alfaro Araya
General Manager

Alejandra Morales Centeno
General Accountant
CPI 21119

Ricardo Araya Jiménez
General Auditor

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

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BANCO NACIONAL DE COSTA RICA
SEPARATE STATEMENT OF COMPREHENSIVE INCOME
FOR THE YEAR ENDED DECEMBER 31, 2021
(With corresponding figures for 2020)
(In colones)

	Note	2021	2020
Finance income			
Cash and due from banks	30	1,065,545,581	2,502,924,461
Investments in financial instruments	30	55,167,075,740	64,466,478,188
Loan portfolio	31	344,698,662,061	386,015,382,903
Gain on foreign exchange differences and DU, net	6-d	298,668,248	-
Gain on financial instruments at fair value through profit or loss		239,355,715	2,921,511,205
Gain on financial instruments at fair value through other comprehensive income		13,620,765,793	7,219,310,720
Gain on derivative financial instruments, net	11	-	15,725,735,198
Other finance income	32	11,335,164,637	16,664,370,003
Total finance income		426,425,237,775	495,515,712,678
Finance costs			
Obligations with the public	33	118,742,063,567	168,032,802,327
Obligations with BCCR		966,894,701	19,124,306
Obligations with financial and non-financial entities	34	33,591,206,635	45,914,448,778
Subordinated, convertible and preferred obligations		3,166,352,899	4,252,886,562
Loss on foreign exchange differences and DU, net	6-d	-	1,004,994,812
Loss on financial instruments at fair value through profit or loss		336,069	3,134,435,194
Loss on financial instruments at fair value through other comprehensive income		184,488,243	851,826,785
Loss on derivative financial instruments, net	11	2,008,593,199	-
Other finance costs	35	1,687,107,808	20,589,640,363
Total finance costs		160,347,043,121	243,800,159,127
Allowance for impairment of assets	36	84,573,936,603	71,893,085,678
Recovery of assets and decrease in allowances	37	17,126,726,766	9,537,340,014
FINANCE INCOME		198,630,984,817	189,359,807,887
Other operating income			
Service fees and commissions	38	120,349,998,140	112,650,879,532
Available-for-sale assets		11,153,298,467	8,075,659,985
Gain on investments in other companies	8	1,167,991,445	866,529,479
Gain on investments in entities supervised by SUGEVAL	8	6,022,365,412	5,286,023,289
Gain on investments in entities supervised by SUPEN	8	1,830,476,046	1,335,721,626
Gain on investments in entities supervised by SUGESE	8	3,614,043,094	3,537,069,285
Foreign currency exchange and arbitrage		22,562,077,616	19,815,874,670
Other income from related parties		705,091,094	496,481,039
Other operating income	39	6,327,424,258	17,002,571,413
Total other operating income		173,732,765,572	169,066,810,318

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

Continued...

BANCO NACIONAL DE COSTA RICA
SEPARATE STATEMENT OF COMPREHENSIVE INCOME
FOR THE YEAR ENDED DECEMBER 31, 2021
(With corresponding figures for 2020)
(In colones)

	Note	2021	2020
Other operating expenses			
Service fees and commissions		34,207,220,686	32,551,382,608
Available-for-sale assets	40	14,287,084,654	20,616,479,120
Provisions	41	6,568,752,081	7,375,190,113
Foreign currency exchange and arbitrage		1,676,821	4,977,522
Other expenses with related parties		891,609,877	663,713,575
Other operating expenses	42	54,760,472,954	52,644,943,503
Total other operating expenses		110,716,817,073	113,856,686,441
GROSS OPERATING INCOME		261,646,933,316	244,569,931,764
Administrative expenses			
Personnel expenses	43	129,837,269,358	124,364,957,364
Other administrative expenses	44	71,987,487,432	69,492,092,835
Total administrative expenses		201,824,756,790	193,857,050,199
NET OPERATING INCOME BEFORE TAXES AND STATUTORY ALLOCATIONS		59,822,176,526	50,712,881,565
Current tax	21-a	13,597,037,026	11,894,096,264
Prior period income tax	21-a	14,189,237,931	14,241,264,445
Deferred tax	21-a	1,564,351,524	1,525,024,144
Deferred tax income	21-a	1,221,352,863	2,151,154,343
Statutory allocations	45	12,540,827,303	10,469,075,982
INCOME FOR THE YEAR		19,152,075,605	14,734,575,073
OTHER COMPREHENSIVE INCOME, NET OF TAX			
Items that will not be reclassified to profit or loss			
Surplus from revaluation of property		199,556,112	459,097,265
Other adjustments		5,360,905,545	3,943,584,208
Items that are or may be reclassified to profit or loss			
Adjustment for valuation of investments at fair value through other comprehensive income		527,365,445	1,664,887,904
Adjustment for valuation of restricted financial instruments		(2,869,322)	(28,711,361)
OTHER COMPREHENSIVE INCOME FOR THE YEAR, NET OF TAX		6,084,957,780	6,038,858,016
TOTAL COMPREHENSIVE INCOME FOR THE YEAR		25,237,033,385	20,773,433,089

Bernardo Alfaro Araya
General Manager

Alejandra Morales Centeno
General Accountant
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Ricardo Araya Jiménez
General Auditor

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

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BANCO NACIONAL DE COSTA RICA
SEPARATE STATEMENT OF CHANGES IN NET EQUITY
FOR THE YEAR ENDED DECEMBER 31, 2021
(With corresponding figures for 2020)
(In colones)

	Note	Share capital	Equity adjustments - Other comprehensive income	Reserves	Capital contributions in special funds	Prior-period retained earnings	Total
Balance at January 1, 2020		172,237,030,102	83,425,758,986	348,798,402,459	34,648,535,964	46,396,797,218	685,506,524,729
Transactions with owners booked directly in equity:							
Legal reserves		-	-	26,473,217,306	-	(26,473,217,306)	-
Other statutory reserves		-	-	6,090,970,561	-	(6,090,970,561)	-
Equity of FOFIDE		-	-	-	4,394,829,159	(4,394,829,159)	-
Total transactions with owners booked directly in equity		-	-	32,564,187,867	4,394,829,159	(36,959,017,026)	-
Comprehensive income for the year:							
Income for the year		-	-	-	-	14,734,575,073	14,734,575,073
Surplus from revaluation of property		-	459,097,265	-	-	-	459,097,265
Adjustment for valuation of investments at fair value through other comprehensive income	10	-	1,664,887,904	-	-	-	1,664,887,904
Adjustment for valuation of restricted financial instruments	10	-	(28,711,361)	-	-	-	(28,711,361)
Surplus from revaluation of property		-	3,943,584,208	-	-	-	3,943,584,208
Realization of surplus from revaluation of property		-	(1,567,578,824)	-	-	1,567,578,824	-
Total comprehensive income for the year		-	4,471,279,192	-	-	16,302,153,897	20,773,433,089
Balance at December 31, 2020	26	172,237,030,102	87,897,038,178	381,362,590,326	39,043,365,123	25,739,934,089	706,279,957,818
Transactions with owners booked directly in equity:							
Legal reserves		-	-	(16,061,647,852)	-	16,061,647,852	-
Other statutory reserves		-	-	(563,704,376)	-	563,704,376	-
Capital contributions in special funds		-	-	-	2,644,138,899	(2,644,138,899)	-
Total transactions with owners booked directly in equity		-	-	(16,625,352,228)	2,644,138,899	13,981,213,329	-
Comprehensive income for the year:							
Income for the year		-	-	-	-	19,152,075,605	19,152,075,605
Surplus from revaluation of property		-	199,556,112	-	-	-	199,556,112
Adjustment for valuation of investments at fair value through other comprehensive income	10	-	527,365,445	-	-	-	527,365,445
Adjustment for valuation of restricted financial instruments	10	-	(2,869,322)	-	-	-	(2,869,322)
Other adjustments		-	5,360,905,545	-	-	-	5,360,905,545
Realization of surplus from revaluation of property		-	(665,187,043)	-	-	665,187,043	-
Total comprehensive income for the year		-	5,419,770,737	-	-	19,817,262,648	25,237,033,385
Balance at December 31, 2021	26	172,237,030,102	93,316,808,915	364,737,238,098	41,687,504,022	59,538,410,066	731,516,991,203

Bernardo Alfaro Araya
General Manager

Alejandra Morales Centeno
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Ricardo Araya Jiménez
General Auditor

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

Céd. 4000001021
Banco Nacional de Costa Rica
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TIMBRE 300.0 COLONES

BANCO NACIONAL DE COSTA RICA
SEPARATE STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED DECEMBER 31, 2021
(With corresponding figures for 2020)
(In colones)

	Note	2021	2020
Cash flows from operating activities			
Income for the year		19,152,075,605	14,734,575,073
Items not requiring cash			
Depreciation and amortization		21,333,240,990	21,939,013,699
Loss on foreign exchange differences and DU, net		26,578,155,910	60,919,709,598
Loss on sale of non-financial assets		8,470,387,244	6,286,466,111
Finance income		(399,865,737,801)	(450,481,861,091)
Finance costs		113,236,425,220	158,896,631,223
Allowance for investments, net		2,758,026,844	1,939,911,841
Allowance for loan losses		78,587,703,720	68,378,115,627
Allowance for other accounts receivable, net		353,517,764	325,932,537
Gain (loss) on allowance for foreclosed assets, net		(7,639,034,697)	2,816,102,003
Severance provision, net		47,336,256	(170,163,612)
Other provisions, net of payments		7,661,272,500	(3,285,048,472)
Share of net profit in subsidiaries and associate		(12,634,875,997)	(11,025,343,679)
Statutory allocations, net		12,540,827,303	10,469,075,982
Income tax expense	21-a	27,786,274,957	26,135,360,709
Deferred tax, net	21-a	342,998,661	(626,130,199)
		(101,291,405,521)	(92,747,652,650)
Cash flows from operating activities			
Loan portfolio		(242,488,531,813)	(10,250,572,711)
Accounts and fees and commissions receivable		(480,410,803)	(1,689,502,370)
Available-for-sale assets		21,103,927,046	13,759,922,634
Other assets		42,527,474,692	(6,773,291,111)
Obligations with the public		366,837,942,829	198,368,498,463
Obligations with BCCR and other entities		(79,566,697,876)	(29,596,865,480)
Obligations for accounts payable, fees and commissions payable and provisions		(12,417,778,531)	(3,670,611,127)
Other liabilities		(1,623,804,943)	(22,783,264,376)
		93,892,120,601	137,364,313,922
Income tax paid		(20,884,046,494)	(24,675,459,310)
Interest received on loan portfolio and investments		411,719,239,934	362,831,408,994
Interest paid on term obligations with the public and financial entities		(123,451,206,985)	(174,076,090,340)
Statutory allocations paid		(10,469,075,982)	(15,048,299,326)
Net cash from operating activities		249,515,625,553	193,648,221,290
Cash flows from investing activities			
Increase in financial instruments		(969,216,949,631)	(2,490,364,675,039)
Decrease in financial instruments		743,911,209,360	2,436,874,227,632
Accrued interest and dividends received		11,236,000,000	3,195,000,000
Acquisition of property and equipment		(27,125,459,450)	(21,086,163,558)
Sale of property and equipment		659,729,939	754,033,903
Acquisition of intangible assets		(8,335,812,378)	(2,277,745,796)
Net cash used in investing activities		(248,871,282,160)	(72,905,322,858)
Cash flows from financing activities			
Settlement of financial obligations		(71,369,074,463)	(39,300,142,052)
New financial obligations		200,485,000,006	46,326,617,260
Payment of lease liabilities		(1,875,696,458)	(1,811,972,981)
Net cash from financing activities		127,240,229,085	5,214,502,227
Net increase in cash and cash equivalents		127,884,572,478	125,957,400,659
Cash and cash equivalents at beginning of year		1,473,447,118,682	1,347,489,718,023
Cash and cash equivalents at end of year	9	1,601,331,691,160	1,473,447,118,682

Bernardo Alfaro Araya
General Manager

Alejandra Morales Centeno
General Accountant
CPI 21119

Ricardo Araya Jiménez
General Auditor

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

VERIFICACIÓN: 1Nm1u4d8
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Registro Profesional: 21119
Contador: MORALES CENTENO ALEJANDRA
Estado de Flujos de Efectivo

(1) Reporting entity

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 General Superintendency 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.

In agreement with IRNBS, if a bank divides its services into departments, its operations must 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 must 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 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 market, pension fund management, investment funds, insurance brokerage, international banking services and electronic banking services. It seeks to: become the leading bank in Costa Rica, strengthening its decisive role in the country's development and wellbeing; significantly promote profitability; offer superior services to the customer at prices aligned with the market; have exemplary organizational health and financial strength.

As of December 31, 2021, the Bank has 156 offices, 446 ATMs and 5,078 employees (2020: 157 offices, 446 ATMs and 5,070 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. Its main activity is performing securities transactions in 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 the Superintendency General of Securities (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 the management, on behalf of third parties, of 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 under the laws of the Republic of Costa Rica. 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 the *Law of the Private Supplemental Pension Fund System* (Law No. 7523) 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).

BN Sociedad 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).

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

Banco Internacional de Costa Rica, S.A. and Subsidiary (BICSA), which was organized under the laws of the Republic of Panama in 1976. BICSA 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. Banco de Costa Rica holds the remaining 51% ownership interest.

(2) Basis of accounting

(a) Basis of accounting

The financial statements have been prepared in accordance with the accounting regulations issued by the National Financial System Oversight Board (CONASSIF) and the General Superintendency of Financial Entities (SUGEF).

With the entrance into effect of SUGEF Directive 30-18 *Regulation on Financial Information* (RFI), the regulatory basis of accounting is updated in order to make progress in the adoption of International Financial Reporting Standards (IFRS). It also includes a single body of regulations, provisions regarding the remission, presentation and publication of financial statements, providing more uniformity in the actions of the superintendencies, as well as preventing duplications.

(b) Basis of measurement

These separate financial statements have been prepared on a historical cost basis, except for financial assets and liabilities at fair value through other comprehensive income and derivative financial instruments, which are measured at fair value; and foreclosed assets for sale, which are measured at the lower of their carrying amount and their estimated realizable value.

The Bank initially recognizes loans, accounts receivable and deposits on the date on which they are originated. All other financial assets (including assets at fair value through profit or loss) are initially recognized on the transaction date, the date on which the Bank commits to purchase or sell an instrument.

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(3) Functional and presentation currency

These separate financial statements and notes thereto are expressed in colones (¢), the currency of the Republic of Costa Rica, in accordance with the accounting regulations issued by CONASSIF and SUGEF.

(4) Use of estimates and judgments

In preparing these financial statements, management has made judgments, estimates and assumptions that affect the application of the Bank's accounting policies and the reported amounts of assets, liabilities, income and expenses. Actual results may differ from these estimates.

Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to estimates are recognized prospectively.

Management applies judgment when determining, through the established control indicators, whether the Bank controls an entity or a separate vehicle.

a- *Judgments*

Information about judgments made in applying accounting policies that have the most significant effects on the amounts recognized in the separate financial statements is included in the following notes:

- Note 5 (b) (ii) – Classification of financial assets: assessment of the business model within which the assets are held and assessment of whether the contractual terms of the asset are solely payment of principal and interest (SPPI) on the principal amount outstanding.

- Note 5-I (ii) – Lease term: Whether the Bank is reasonably certain that it will exercise extension options.

- Note 5 (b) (ii) – Establishing the criteria for determining whether credit risk on a financial asset has increased significantly since initial recognition, determining the methodology for incorporating forward-looking information in the measurement of ECL and selection and approval of models used to measure ECL.

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b- *Assumptions and estimation uncertainties*

Information about assumptions and estimation uncertainties that have a significant risk of resulting in a material adjustment in the year ended December 31, 2021 and 2020 is related to the impairment of financial instruments.

(i) *Fair value measurement*

The best evidence of the fair value of a financial instrument on initial recognition is normally the transaction price – i.e. the fair value of the consideration given or received.

(5) Significant accounting policies

The Bank has consistently applied the following accounting policies to all years presented in the separate financial statements.

(a) Foreign currency

i. *Foreign currency transactions*

Monetary assets and liabilities denominated in foreign currencies are translated into colones at the foreign exchange rate ruling at the date of the separate statement of financial position, 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 currency differences arising on translation are recognized in profit or loss for the year.

ii. *Monetary unit and foreign exchange regulations*

The parity of the colon with the US dollar is determined in a free exchange market, under the supervision of the Central Bank of Costa Rica (BCCR) through a managed float regime. Under the managed float regime, the exchange rate is determined by the market, but BCCR still reserves the right to intervene in the foreign currency market to moderate significant fluctuations in the exchange rate and prevent deviations from the behavior of the variables that explain its medium- and long-term trends.

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In conformity with the *Law to Strengthen Public Finances* (Law No. 9635), as of January 1, 2020, assets and liabilities in foreign currency must be expressed in colones, using the reference selling rate set by BCCR.

iii. *Method for valuation of assets and liabilities in foreign currency*

As of December 31, 2021, assets and liabilities in US dollars were valued at the exchange rate of ¢645.25 per US$1.00 (2020: ¢617.30 per US$1.00), which is the reference selling rate established by BCCR.

As of December 31, 2021, assets and liabilities denominated in euro were valued at the exchange rate of ¢732.17 per €1.00 (2020: ¢758.11 per €1.00), which is obtained by multiplying the international Reuter exchange rate by the reference rate set by BCCR for the sale of US dollars on the last business day of the month.

As of December 31, 2021, assets and liabilities denominated in Development Units (DU) were valued at the exchange rate of ¢948.36 to DU1.00 (2020: ¢920.08 to DU1.00). This exchange rate is based on the DU value tables published by SUGEVAL.

iv. *Foreign operations*

The financial statements of BICSA are presented in US dollars, which is the entity's functional currency. They have been converted as follows:

- Monetary assets and liabilities denominated in US 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 transaction date (historical exchange 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 exchange rates).
- Income and expenses have been translated at average exchange rates in effect for the year.

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(b) Financial instruments

(i) Recognition and initial measurement

The Bank initially recognizes cash, deposits in checking accounts and cash equivalents on the date on which they are originated. All other financial instruments are recognized on the trade date, which is the date on which the Bank becomes a party to the contractual provisions of the instrument.

A financial asset or financial liability is measured initially at fair value plus, for an item not at fair value through profit or loss (FVTPL), transactions costs that are directly attributable to its acquisition or issue.

(ii) Classification and subsequent measurement

Financial assets

Classification

On initial recognition, a financial asset is classified as measured at: amortized cost, fair value through other comprehensive income or fair value through profit or loss, according to the business model under which it is managed as well as the characteristics of the contractual cash flows.

Financial assets are not reclassified subsequent to their initial recognition, unless the Bank changes its business model for managing financial assets, in which case all affected financial assets are reclassified on the first day of the first reporting period following the change in business model.

A financial asset is measured at amortized cost if it meets both of the following conditions and is not designated as at fair value through profit or loss:

- it is held within a business model whose objective is to hold assets to collect contractual cash flows; and
- its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

A financial asset is measured at fair value through other comprehensive income if it meets both of the following conditions and it is not designated as at fair value through profit or loss:

- it is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets; and
- its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

All financial assets not classified as measured at amortized cost or fair value through other comprehensive income as described above are measured at fair value through profit or loss.

On initial recognition, the Bank may irrevocably designate a financial asset that otherwise meets the requirements to be measured at amortized cost or at fair value through other comprehensive income as at fair value through profit or loss if doing so eliminates or significantly reduces an accounting mismatch that would otherwise arise.

Business model assessment

The Bank makes an assessment of the objective of the business model in which a financial asset is held at a portfolio level because this best reflects the way the business is managed and information is provided to management. The information considered includes:

- the stated policies and objectives for the portfolio and the operation of those policies in practice. In particular, whether management's strategy focuses on earning contractual interest revenue, maintaining a particular interest rate profile, matching the duration of the financial assets to the duration of the liabilities that are funding those assets or realizing cash flows through the sale of the assets;
- how the performance of the portfolio is evaluated and reported to the Bank's senior management;
- the risks that affect the performance of the business model (and the financial assets held within that business model) and how those risks are managed;

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- how managers of the business are compensated – e.g. whether compensation is based on the fair value of the assets managed or the contractual cash flows collected; and
- the frequency, volume and timing of sales of financial assets in prior periods, the reason for such sales and expectations about future sales activity.

The transfer of financial assets to third parties in transactions that do not qualify for derecognition are not considered sales for that purpose, in conformity with the continuous recognition of assets.

Financial assets held for trading or managed whose performance is assessed on a fair value basis are measured at fair value through profit or loss.

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

For the purposes of this assessment, 'principal' is defined as the fair value of the financial asset on initial recognition. However, the principal may change over time (e.g. if there are reimbursements of the principal).

'Interest' is defined as consideration for the time value of money and for the credit risk associated with the principal amount outstanding during a specific period of time and for other basic lending risks and costs (e.g. liquidity risk and administrative costs), as well as a profit margin.

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

- contingent events that would change the amount or timing of cash flows;
- terms that may adjust the contractual coupon rate, including variable-rate features;
- prepayment and extension features; and
- terms that limit the Bank's claim to cash flows from specified assets (e.g. non-recourse loans);
- features that modify consideration of the time value of money (e.g. periodical reset of interest rates).

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A prepayment feature is consistent with the solely payments of principal and interest criterion if the prepayment amount substantially represents unpaid amounts of principal and interest on the principal amount outstanding, which may include reasonable additional compensation for early termination of the contract.

Additionally, for a financial asset acquired at a discount or premium to its contractual par amount, a feature that permits or requires prepayment at an amount that substantially represents the contractual par amount plus accrued (but unpaid) contractual interest (which may also include reasonable additional compensation for early termination) is treated as consistent with this criterion if the fair value of the prepayment feature is insignificant at initial recognition.

Subsequent measurement and gains and losses

Financial assets at fair value through profit or loss are subsequently measured at fair value. Net gains and losses, including any interest or dividend income, are recognized in profit or loss.

Financial assets at fair value through other comprehensive income are subsequently measured at fair value. Interest income calculated using the effective interest method, foreign exchange gains and losses and impairment are recognized in profit or loss. Other net gains and losses are recognized in other comprehensive income and are accumulated in the fair value reserve. On derecognition, gains and losses accumulated in other comprehensive income are reclassified to profit or loss.

Financial assets at amortized cost are subsequently measured at amortized cost using the effective interest method. Interest income, foreign exchange gains and losses and impairment are recognized in profit or loss. Any gain or loss on derecognition is recognized in profit or loss.

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Financial liabilities

Classification

Financial liabilities are classified as measured at amortized cost or fair value through profit or loss.

A financial liability is classified as at fair value through profit or loss if it is classified as held for trading or it is designated as such on initial recognition.

Subsequent measurement and gains and losses

Financial liabilities at fair value through profit or loss are measured at fair value and net gains and losses, including any interest expense, are recognized in profit or loss.

Other financial liabilities are subsequently measured at amortized cost using the effective interest method. Interest expense and foreign exchange gains and losses are recognized in profit or loss. Any gain or loss on derecognition is recognized in profit or loss.

(iii) *Impairment of financial assets*

The Bank recognizes expected credit losses on the following assets that are not measured at fair value through profit or loss:

- Investment in financial instruments (amortized cost and FVOCI)
- Accrued interest receivable

The Bank measures loss allowances at an amount equal to 12-month ECL or lifetime ECL.

12-month ECL are the portion of lifetime ECL that result from default events on a financial instrument that are possible within the 12 months after the reporting date. Financial instruments for which 12-month ECL are recognized are referred to as 'Stage 1 financial instruments'. Financial instruments allocated to Stage 1 have not undergone a significant increase in credit risk since initial recognition and are not credit-impaired.

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Lifetime ECL are the ECL that result from all possible default events over the expected life of the financial instrument or the maximum contractual period of exposure. Financial instruments for which lifetime ECL are recognized but that are not credit-impaired are referred to as 'Stage 2 financial instruments'. Financial instruments allocated to Stage 2 are those that have experienced a significant increase in credit risk since initial recognition but are not credit-impaired.

Financial instruments for which lifetime ECL are recognized and that are credit-impaired are referred to as 'Stage 3 financial instruments'.

Measurement of ECL

ECL are a probability-weighted estimate of credit losses. They are measured as follows:

- financial assets that are not credit-impaired at the reporting date: as the present value of all cash shortfalls (i.e. the difference between the cash flows due to the entity in accordance with the contract and the cash flows that the Bank expects to receive);
- financial assets that are credit-impaired at the reporting date: as the difference between the gross carrying amount and the present value of estimated future cash flows.

ECL are discounted using the effective interest rate of the financial asset.

At each reporting date, the Bank assesses whether financial assets carried at amortized cost and debt securities at fair value through other comprehensive income are credit impaired. A financial asset is 'credit impaired' when one or more events that have a detrimental impact on the estimated future cash flows of the financial asset have occurred.

Evidence that a financial asset is credit-impaired includes the following observable data:

- significant financial difficulty of the borrower or issuer;
- a breach of contract such as a default or being more than 90 days past due;

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- the restructuring of a loan or advance by the Bank on terms that the Bank would not consider otherwise;
- it is becoming probable that the borrower will enter bankruptcy or other financial reorganization; or
- the disappearance of an active market for a security because of financial difficulties.

Presentation of allowance for ECL in the statement of financial position

Loss allowances for financial assets measured at amortized cost are presented as a deduction from the gross carrying amount of the assets. For debt securities at fair value through other comprehensive income, the loss allowance is charged to profit or loss and is recognized in other comprehensive income.

Forward-looking information

The Bank incorporates forward-looking information into both the assessment of whether the credit risk of an instrument has increased significantly since its initial recognition and the measurement of ECL. The Bank will formulate a base scenario of the future direction of the relevant economic variables, considering the advice of the Corporate Risk Committee, the Investments Committee, and external information and forecasts. This process entails the development of two or more additional economic scenarios and assessing their likelihood.

The base scenario will represent a more likely outcome; it is aligned with information used by the Bank for other purposes such as strategic planning and budgeting. The other scenarios are one upside scenario and one downside scenario. Periodically, the Bank carries out stress testing of more extreme shocks to calibrate its determination of the upside and downside representative scenarios.

(c) Impairment of non-financial assets

At each reporting date, the Bank reviews the carrying amounts of its non-financial assets (other than investment properties and deferred tax assets) to determine whether there is any indication of impairment. If any such indication exists, then the asset's recoverable amount is estimated. Goodwill and intangible assets with indefinite useful lives are tested annually for impairment.

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The recoverable amount of an asset or CGU is the greater of its value in use and its fair value less costs to sell. Value in use is based on estimated future cash flows, discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risk specific to the asset or CGU.

An impairment loss is recognized if the carrying amount of an asset or CGU exceeds its recoverable amount.

Impairment losses are recognized in profit or loss. They are allocated first to reduce the carrying amount of any goodwill allocated to the CGU, and then to reduce the carrying amounts of the other assets in the CGU (or groups of CGUs) on a pro rata basis.

An impairment loss in respect of goodwill is not reversed. For other assets, an impairment loss is reversed only to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortization, if no impairment loss had been recognized.

(iv) Derecognition

Financial assets

The Bank derecognizes a financial asset from its statement of financial position when the contractual rights to the cash flows from the financial asset expire, or it transfers the rights to receive the contractual cash flows in a transaction in which substantially all of the risks and rewards of ownership of the financial asset are transferred or in which the Bank neither transfers nor retains substantially all of the risks and rewards of ownership and it does not retain control of the financial asset.

On derecognition of a financial asset, the difference between the carrying amount of the asset (or the carrying amount allocated to the portion of the asset derecognized) and the consideration received (including any new asset obtained less any new liability assumed) is recognized in profit or loss.

Financial liabilities

The Bank derecognizes a financial liability when its contractual obligations are discharged or cancelled, or expire.

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(v) *Offsetting*

Financial assets and financial liabilities are offset and the net amount presented in the separate statement of financial position when, and only when, the Bank currently has a legally enforceable right to set off the amounts and it intends either to settle them on a net basis or to realize the asset and settle the liability simultaneously.

Income and expenses are presented on a net basis only when permitted under IFRS Standards, or for gains and losses arising from a group of similar transactions, such as gains or losses on financial assets measured at fair value through profit or loss.

(d) Derivative financial instruments

Derivatives held for risk management purposes include all derivative assets and liabilities that are not classified as trading assets or liabilities. All derivatives are measured at fair value in the separate statement of financial position.

If a derivative is not held for trading and is not designated in a qualifying hedging relationship, then all changes in its fair value are recognized immediately in profit or loss as a component of net income from other financial instruments at fair value through profit or loss.

(e) Embedded derivatives

Derivatives may be embedded in another contractual arrangement (a host contract). The Bank accounts for an embedded derivative separately from the host contract when:

- the host contract is not itself carried at fair value through profit or loss;
- the terms of the embedded derivative would meet the definition of a derivative if they were contained in a separate contract; and
- the economic characteristics and risks of the embedded derivative are not closely related to the economic characteristics and risks of the host contract.

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Separated embedded derivatives are measured at fair value, with all changes in fair value recognized in profit or loss unless they form part of a qualifying cash flow or net investment hedging relationship. Separated embedded derivatives are presented in the separate statement of financial position together with the host contract.

The Bank currently has the following derivative financial instruments:

✓ *Derivatives held for risk management*

The Bank formalized derivative instruments to hedge exposure to the LIBOR rate related to the issue of debt in October 2013 and April 2016 at a fixed rate in US dollars, with the purpose of compensating for changes in fair value attributable to changes in said benchmark rate.

LIBOR will cease to be published in 2021; however, the 3-month and 6-month settings will continue to be published until 2023. Therefore, information will still be reflected with the LIBOR rate until new rates are negotiated for contracts effective as of that date.

✓ *Derivatives other than hedges*

The Bank entered into currency forwards 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.

These types of instruments are products which the Bank can offer to its clients pursuant to the authorization provided by BCCR to operate exchange rate derivatives.

For 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 market interest rates in colones and in US dollars, applicable to the different terms.

(f) Cash and cash equivalents

Cash and cash equivalents include demand deposits in other banks and deposits in BCCR with original maturities of less than three months that are subject to an insignificant risk of changes in their fair value and are used by the Bank in the management of its short-term commitments.

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

(g) Property, furniture, equipment and leasehold improvements

- *Recognition and measurement*

Items of property, furniture, equipment and leasehold improvements are measured at cost less accumulated depreciation and any accumulated impairment losses. Cost includes disbursements directly attributable to the acquisition of the asset. If significant parts of an item of property, furniture, equipment, and leasehold improvements have different useful lives, then they are accounted for as separate items (major components) of vehicle, furniture, equipment and leasehold improvements. Purchased software that is integral to the functionality of the related equipment is capitalized as part of that equipment.

- *Subsequent costs*

Subsequent expenditure is capitalized only if it is probable that the future economic benefits associated with the expenditure will flow to the Bank. Ongoing repairs and maintenance are expensed as incurred.

- *Depreciation and amortization*

Depreciation is calculated using the straight-line method over the estimated useful life of each item of property, furniture, equipment and leasehold improvements, and it is recognized in profit or loss for the period. Leased assets are depreciated over the shorter of the lease term and their useful lives unless it is reasonably certain that the Bank will obtain ownership by the end of the lease term. Land is not depreciated.

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The estimated useful lives for the current period and comparative periods are as follows:

Type of asset	Estimated useful life
Buildings	25 to 120 years
Vehicles	10 years
Furniture and equipment	10 years
Computer hardware	5 years
Laptops	3 years
Leasehold improvements	According to the estimated useful life or the term of the lease

(h) Intangible assets

(i) Recognition and measurement

Intangible assets are measured at cost less accumulated amortization and any accumulated impairment losses.

(ii) Amortization

Software is amortized on a straight-line basis in profit or loss over its estimated useful life, from the date on which it is available for use. The estimated useful life of software is three to five years.

(iii) Subsequent expenditure

Subsequent expenditure on software assets is capitalized only when it increases the future economic benefits embodied in the specific asset to which it relates. All other expenditure is recognized in profit or loss as it is incurred.

(i) Leases

At inception of a contract, the Bank assesses whether a contract is, or contains, a lease. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a specific period of time in exchange for consideration.

(i) *As a lessee*

At commencement or on modification of a contract that contains a lease component, the Bank allocates consideration in the contract to each lease component on the basis of its relative stand-alone price.

The Bank recognizes a right-of-use asset and a lease liability at the lease commencement date. The right-of-use asset is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or before the commencement date, plus any initial direct costs incurred and an estimate of costs to dismantle and remove the underlying asset or to restore the underlying asset or the site on which it is located, less any lease incentives received.

The right-of-use asset is subsequently depreciated using the straight-line method from the commencement date to the end of the lease term, unless the lease transfers ownership of the underlying asset to the Bank by the end of the lease term or the cost of the right-of-use asset reflects that the Bank will exercise a purchase option. In that case the right-of-use asset will be depreciated over the useful life of the underlying asset, which is determined on the same basis as those of property and equipment. In addition, the right-of-use asset is periodically reduced by impairment losses, if any, and adjusted for certain remeasurements of the lease liability.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease or, if that rate cannot be readily determined, the Bank's incremental borrowing rate. Generally, the Bank uses its incremental borrowing rate as the discount rate.

The Bank determines its incremental borrowing rate by obtaining interest rates from various external financing sources and makes certain adjustments to reflect the terms of the lease and type of the asset leased.

Lease payments included in the measurement of the lease liability comprise the following:

- fixed payments, including in-substance fixed payments; and
- the exercise price under a purchase option that the Bank is reasonably certain to exercise; lease payments in an optional renewal period if the Bank is reasonably certain to exercise an extension option; and penalties for early termination of a lease unless the Bank is reasonably certain not to terminate early.

(Continued)

The lease liability is measured at amortized cost using the effective interest method. It is remeasured when there is a change in future lease payments arising from a change in an index or rate, if there is a change in the Bank's estimate of the amount expected to be payable under a residual value guarantee, if the Bank changes its assessment of whether it will exercise a purchase, extension or termination option or if there is a revised in-substance fixed lease payment.

When the lease liability is remeasured in this way, a corresponding adjustment is made to the carrying amount of the right-of-use asset or is recorded in profit or loss if the carrying amount of the right-of-use asset has been reduced to zero.

(ii) *Short-term leases and leases of low-value assets*

The Bank has elected not to recognize right-of-use assets and lease liabilities for leases of low-value assets and short-term leases. The Bank recognizes the lease payments associated with these leases as an expense on a straight-line basis over the lease term.

(j) Loan portfolio

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.

(k) Allowance for loan losses

The allowance for loan losses is based on a periodic assessment of the probability of recovery 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.

(Continued)

Additionally, the probability of recovery 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, quality of guarantees and delinquency.

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 December 31, 2021 and 2020, increases in the allowance for loan losses are included in the accounting records in accordance with Article 10 of IRNBS.

(l) 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.

(m) Other receivables

Other receivables are recorded at amortized cost. 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.

(n) Foreclosed assets

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

(Continued)

Foreclosed assets are valued at the lower of cost and market value. If market 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 year in which they were incurred.

The net realizable value of an asset should be used as its market value. Net realizable value is determined by applying strictly conservative criteria and is calculated by subtracting expenses to be incurred in 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. 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 performed the appraisals and those reports must be updated at least annually.

If an asset booked under foreclosed assets is used by the Bank, it should be reclassified to the appropriate account.

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. Through notes No. 1573-09 and No. 1574-10 dated May 7, 2020, CONASSIF communicated by means of Article 72 of IRNBS (Law No. 1644) the extension of the term from 24 months to 48 months, whereby the total (100%) allowance for impairment of foreclosed assets must be applied. However, if it has not been sold within 24 months from the date of the award or receipt of the asset, the entity must request from the Superintendency an extension for an equal term for sale of the asset. The extension request may be denied by the Superintendency, providing adequate grounds for its decision, in which case it will require the creation of an allowance for 100% of the carrying amount. If the entity does not request an extension, it will also be required to create an allowance.

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

(o) Accounts payable and other liabilities

Accounts payable and other liabilities are carried at amortized cost.

(p) Provisions

A provision is recognized in the separate statement of financial position 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 date of the separate statement of financial position, directly affecting the separate statement of comprehensive income.

(q) Employee benefits

(i) Short-term employee benefits

Short-term employee benefits are expensed as the related service is provided. A liability is recognized for the amount expected to be paid if the Bank has a present legal or constructive obligation to pay this amount as a result of past service provided by the employee and the obligation can be estimated reliably.

Statutory Christmas bonus

Each month, the Bank books an accrual to cover future statutory Christmas bonus disbursements. Costa Rican legislation requires the payment of one-twelfth of an employee's monthly salary for each month of service. That payment is made to the employee in December, even in the event of dismissal. In the case of dismissals or resignations that occur prior to December, the employee is entitled to a bonus that is proportional to the time worked during the year.

Vacation

Costa Rican legislation establishes that for every fifty weeks of service, employees are entitled to two weeks of vacation. The Bank has the policy that for all of its personnel, the accrued vacation days at year end may not exceed one and a half years.

(Continued)

Incentives plan

The Bank has an incentives and performance assessment system (*Sistema de Evaluación del Desempeño e Incentivos*, SEDI). It is defined at the BNCR financial conglomerate level and is subject to management models that have been previously approved.

The score obtained in this assessment is the sum of the percentages obtained in the individual and group evaluations. The minimum score to be obtained is 80 points.

These incentives aim 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.

These incentives are paid as compensations for the employees' business effort and individual effort, so as to promote an extraordinary performance, reaching the goals established in the Annual Operating Plan and in the Strategic Plan. This salary incentive is annual; the evaluation covers from January to December of each year. The allowance is calculated as 15% of income after income tax and statutory allocations. The amount obtained from that percentage includes the social security contributions corresponding to that payment.

This item may not exceed 60% of the employee's monthly salary, in conformity with the guidelines set forth by the Executive Branch in Directive No. 026-H dated May 26, 2015 "Regarding the Policies on the Payment of Incentives at State-Owned Banks" and Directive No. 036-H dated November 10, 2015 "Regarding the Parameters to be Used in Determining the Feasibility of the Payment of Incentives to Employees of State-Owned Banks".

The expense for the incentive is booked monthly in a liability account, which is liquidated the following year when the payment is made to employees and former employees who met the required conditions. There is an arbitration underway, which prevents the payment of this incentive for 2021.

(ii) *Defined contribution plans*

Obligations for contributions to defined contribution plans are expensed as the related service is provided. This includes the contributions to supplemental pension fund operators.

(Continued)

Pursuant to the *Employee Protection Law*, all 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.

(iii) *Defined benefit plans*

The Bank's net obligation in respect of defined benefit plans is calculated separately for each plan by estimating the amount of future benefit that employees have earned in the current and prior periods, discounting that amount and deducting the fair value of any plan assets.

The calculation of defined benefit obligations is performed annually by a qualified actuary using the projected unit credit method. When the calculation results in a potential asset for the Bank, the recognized asset is limited to the present value of economic benefits available in the form of any future refunds from the plan or reductions in future contributions to the plan. To calculate the present value of economic benefits, consideration is given to any applicable minimum funding requirements.

Remeasurements of the net defined benefit liability, which comprise actuarial gains and losses, the return on plan assets (excluding interest) and the effect of the asset ceiling (if any, excluding interest), are recognized immediately in other comprehensive income. The Bank determines the net interest expense (income) on the net defined benefit liability (asset) for the year by applying the discount rate used to measure the defined benefit obligation at the beginning of the annual period to the then-net defined benefit liability (asset), taking into account any changes in the net defined benefit liability (asset) during the year as a result of contributions and benefit payments. Net interest expense and other expenses related to defined benefit plans are recognized in profit or loss.

When the benefits of a plan are changed or when a plan is curtailed, the resulting change in benefit that relates to past service or the gain or loss on curtailment is recognized immediately in profit or loss. The Bank recognizes gains and losses on the settlement of a defined benefit plan when the settlement occurs.

(Continued)

(iv) *Termination benefits*

Termination benefits are expensed when the Bank has an obligation in relation to those benefits. If benefits are not expected to be settled wholly within 12 months of the reporting date, then they are discounted.

Costa Rican legislation requires the payment of severance benefits to employees in the event of retirement, death or dismissal without just cause, equivalent to seven days' salary for employees with between three and six months of service, 14 days' salary for employees with between six months and one year of service and an amount prescribed by the *Employee Protection Law* for employees with more than 1 year of service, up to a maximum of eight years.

The Bank makes monthly transfers to the Employee Association (*Asociación Solidarista de Empleados del Banco Nacional*, ASEBANACIO) equivalent to 5.33% of member employees' monthly salaries for management and custody, which are expensed in the year incurred. The aforementioned contributions and those made to the Supplemental Pension System are considered advance severance payments.

In the event of dismissal without just cause, the amount payable to the former employee is calculated and if there are any differences between the calculation and the amount payable by the Employee Association, the Bank assumes the difference as an expense. If the dismissal is with just cause, then the Bank does not have to make any payments.

(v) *Employee Protection and Retirement Fund*

The Employee Protection and Retirement Fund of Banco Nacional de Costa Rica (the Fund) was created by the *Law of Banco Nacional de Costa Rica* (Law No. 16) dated November 5, 1936 and has been amended on a number of occasions. The most recent amendment was included in the *Law to Modernize the Financial System of the Republic* (Law No. 7107) dated 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;

(Continued)

- contributions made by employees equivalent to 5.50% of total wages to strengthen the Fund; and
- 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. The Fund operates based on the principle of solidarity.

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

(r) 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 for the year since it has not yet been accrued. Deferred income is recognized and credited to the corresponding income account as it accrues.

(s) 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.

(Continued)

Other statutory reserves

In order to comply with Panamanian regulations, the associate BICSA must create the following statutory reserves:

Statutory reserve	Agreement of the Superintendency of Banks of Panama
Statutory reserve for foreclosed assets	Agreement No. 003-2009
Statutory dynamic provision	Agreement No. 004-2013

(t) Revaluation surplus

Revaluation surplus included in the separate statement of changes in equity may be transferred directly to prior period 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 prior period retained earnings is not made through the separate statement of comprehensive income. Per SUGEF's authorization, the Bank follows the policy of transferring the revaluation surplus to prior period retained earnings for subsequent capitalization, in conformity with Article 8 of IRNBS (Law No. 1644).

(u) 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 December 31 of each year. Any resulting tax is recognized in profit or loss for the year and credited to a liability account in the separate statement of financial position.

i. Current tax

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

(Continued)

ii. Deferred tax

Deferred tax is recognized 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.

iii. Tax benefits - FOCREDE

Regarding the tax benefits applied to the Development Credit Fund (FOCREDE), the Development Financing Fund (FOFIDE) and the National Development Trust (FINADE) as part of the resources of the Development Banking System managed by the Bank, as established in Article 15 of the *Comprehensive Amendment to Law No. 8634, Development Banking System Act and Amendment to Other Laws* (Law No. 9274), effective from November 27, 2014, that fund is exempt from income tax and from any other type of tax.

The 8% exemption on securities is effective from August 23, 2016, as evidenced in certification SRCST-TV-009-2016 of the Ministry of Finance issued for the period of one year, which was renewed indefinitely by means of resolution DGCN-146-2017, at the request of the banks that manage the fund, i.e. Banco Nacional de Costa Rica and Banco de Costa Rica. Pursuant to the *Law to Strengthen Public Finances* (Law No. 9635), a 15% exemption is effective from July 1, 2019.

(Continued)

(v) 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 and that is subject to risks and returns different from those of other business segments.

(w) Financial statements of the different departments

The separate financial statements include the financial statements of the Commercial Banking, Mortgage Banking and Rural Credit Banking departments, which 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 subordinated to the Bank's General Board of Directors.

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

Pursuant to the provisions of Article 43 of IRNBS (Law No. 1644), the accounting records of each of the Bank's departments are kept separately.

(x) Recognition of income and expenses

i. Interest income and interest expense

Interest income and interest expense are recognized in the separate statement of comprehensive income as they accrue. Interest income and interest 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. Interest income on those loans is recognized when collected.

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 statement of comprehensive income.

(Continued)

The Bank took extraordinary measures to help its customers and give flexibility with payments to borrowers affected by the economic crisis caused by the pandemic. The solutions offered included COVID-19 restructuring, which allowed the customer to suspend the payment for a specific number of installments, which were then restructured as follows:

a) The principal of the unpaid installments is prorated among the remaining installments of the payment plan, to be paid within the remaining term of the operation;

b) Interest corresponding to the restructured installments shall be payable at the end of the term of the operation, or it can be settled previously by the customer if they wish to do so.

These measures were adopted considering the cycle of economic activities. Some of them exceed six months, which entailed the accrual of interest for more than 180 days.

Regarding accrual on the loan portfolio over 180 days, official letter CNS-1698/08 indicates that an allowance must be created with cutoff date as of October 2021. Of the balance booked in accrued interest receivable on the loan portfolio, the Bank must record ¢34,868 million, corresponding to accrued interest over 180 days. Allowances in the amount of ¢1,908 million have already been booked; therefore, the base balance to be recorded in the allowance plan is ¢32,960 million. The allowance plan must be carried out during the next 48 months, with bi-annual cutoffs. However, the balance must be updated at the beginning of each semester, considering the payments made, refinancing, default and other effects.

Semester	Minimum allowance percentage of the balance of accrued interest receivable over 180 days	Minimum allowance required
2022-06	9%	2,966
2022-12	18%	5,933
2023-06	30%	9,888
2023-12	42%	13,843
2024-06	56%	18,458
2024-12	70%	23,072
2025-06	85%	28,017
2025-12	100%	32,960

ii. *Fee and commission income*

Fee and commission income arises on services provided by the Bank and is recognized when the corresponding service is provided. When fees and commissions are an integral part of the return on the underlying operation, they are deferred over the term of the operation and amortized using the effective interest method.

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 separate statement of comprehensive income on a monthly basis.

iv. *Operating lease expenses*

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

(y) Statutory allocations

In accordance with SUGEF's Chart of Accounts, statutory allocations on the year's net earnings payable to the National Institute for Cooperative Development (INFOCOOP), the National Emergency Commission (CNE), the National Commission for Educational Loans (CONAPE) and the Disability, Old Age and Death Benefit System (RIVM) are recognized as expenses in the separate statement of comprehensive income.

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 INFOCOOP; and the remainder to increase the Bank's capital, pursuant to Article 20 of Law No. 6074.

Pursuant to paragraph a) of Article 20 of the *Law to Create the National Commission for Education (CONAPE)* (Law No. 6041), the Bank is required to make statutory allocations equivalent to 5% of earnings before taxes and statutory allocations to CONAPE.

(Continued)

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 the *Employee Protection Law* (Law No. 7983) 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 RIVM of CCSS and to provide universal CCSS coverage for impoverished non-salaried workers.

(z) Development Financing Funds (FOFIDE)

In accordance with Article 32 of the *Development Banking System Act* (Law No. 8634), all State-owned banks, except Banco Hipotecario para la Vivienda (BANHVI), must 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 State-owned banks must transfer to their respective funds the amount corresponding to prior year's 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.

(aa) Development Credit Fund (FOCREDE)

The Development Credit Fund (FOCREDE) is comprised of the funds prescribed in Article 59 of IRNBS (Law No. 1644). FOCREDE will be managed by State-owned banks. Accordingly, in compliance with the *Repeal of Transition Provision VII of Law No. 8634* (Law No. 9094) and Article 35 of the *Development Banking System Act* (Law No. 8634), 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 managers for five years from the date of signing of the respective management agreements, renewable for equal periods. Each bank is awarded the management of fifty percent (50%) of such fund.

As a result, 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. Pursuant to Article 6 of Law No. 8634, the Managing Banks may offer first-tier banking services to the beneficiaries of the Development Banking System.

b. Pursuant to Article 35 of Law No. 8634, the Managing Banks may offer second-tier banking services with FOCREDE 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. Pursuant to Article 35 of Law No. 8634, the Managing Banks may channel FOCREDE 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.

(bb) Trust operations

Assets managed by the Bank as trustee are not considered part of the Bank's equity and, therefore, are not included in the consolidated financial statements. Fee and commission income derived from trust management is recognized on an accrual basis.

(6) Risk management

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

- credit risk
- liquidity risk
- market risk
  - interest rate risk
  - currency risk
- 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. the Brokerage Firm, Investment Fund Manager and Pension Fund Manager.

(Continued)

The Bank manages the above risks as follows:

a) Credit risk

This is the risk that the borrower or issuer of a financial asset fails to meet its contractual obligations, 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 investment securities. The exposure to credit risk on those assets is represented by the carrying amount of the assets in the separate statement of financial position. 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.

The Bank has established the following credit risk management procedures:

- The Bank has defined procedures for monitoring, application of controls and loan processing. The functions, tasks and procedures performed by the Credit Risk Division have been documented with the support of the Quality Management Division. This has allowed the Bank to optimize and standardize the process.
- The Bank has established and reviewed administrative procedures for loan follow-up in branches and regional offices.
- The Bank is performing a comprehensive assessment of the credit granting process and the procedures performed in offices, shared service centers, commercial areas and corporate center.
- 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 separate statement of financial position, there are no significant concentrations of credit risk. The maximum exposure to credit risk is represented by the carrying amount of each financial asset.

(Continued)

As of December 31, the Bank's financial instruments with exposure to credit risk are as follows:

	Note	Direct		Stand-by	
		2021	2020	2021	2020
Loan portfolio					
Principal		¢ 4,534,330,590,665	4,358,712,393,620	343,468,286,255	326,647,988,405
Accounts and accrued interest receivable		110,377,468,668	122,742,551,278	-	-
Gross carrying amount		4,644,708,059,333	4,481,454,944,898	343,468,286,255	326,647,988,405
Incremental direct costs related to loans		3,675,079,715	3,756,519,754	-	-
(Deferred income from loan portfolio)		(35,117,407,652)	(33,106,164,873)	-	-
Allowance for loan losses (accounting records)		(134,969,114,159)	(137,910,635,469)	(862,169,136)	(717,444,504)
Net carrying amount		¢ 4,478,296,617,237	4,314,194,664,310	342,606,117,119	325,930,543,901

		Direct		Stand-by	
		2021	2020	2021	2020
Loan portfolio					
Total balances:					
0	¢	38,542,571,361	40,994,588,758	-	-
A1		3,547,626,299,530	3,345,716,965,669	318,791,530,806	317,614,486,504
A2		64,839,046,769	70,320,669,488	1,350,094,056	1,096,793,509
B1		496,959,517,225	488,272,878,369	19,579,666,173	3,298,059,207
B2		19,393,633,811	11,113,365,743	94,766,477	108,882,676
C1		153,800,694,145	109,225,670,415	1,377,025,818	1,087,057,410
C2		17,461,789,224	6,041,845,665	123,641,928	28,546,854
D		124,274,772,442	189,627,097,686	763,454,913	1,693,080,384
E		181,809,734,826	220,141,863,105	1,388,106,084	1,721,081,861
		4,644,708,059,333	4,481,454,944,898	343,468,286,255	326,647,988,405
Structural allowance (subledger – database)		(93,400,972,388)	(121,583,122,042)	(293,237,854)	(159,549,419)
Net carrying amount	¢	4,551,307,086,945	4,359,871,822,856	343,175,048,401	326,488,438,986
Individually assessed loans with allowance:					
0	¢	38,871,253,691	40,994,588,758	-	-
A1		3,546,825,283,141	3,345,716,965,669	22,773,177,666	38,054,128,498
A2		64,839,046,769	70,320,669,488	26,833,348	48,005,089
B1		496,959,517,225	488,272,878,369	15,862,698,895	785,385,236
B2		19,393,633,811	11,113,365,743	-	-
C1		153,620,176,301	109,225,670,415	24,609,002	35,434,298
C2		17,461,789,224	6,041,845,665	4,073,391	-
D		124,274,772,442	189,627,097,686	59,645,358	46,196,377
E		181,579,058,900	220,141,863,105	46,371,877	9,921,901
		4,642,824,531,504	4,481,454,944,898	38,797,409,537	38,979,071,399
Structural allowance (subledger – database)		(93,400,972,388)	(121,583,122,042)	(293,237,854)	(159,549,419)
Net carrying amount	¢	4,549,423,559,116	4,359,871,822,856	38,504,171,683	38,819,521,980

(Continued)

BANCO NACIONAL DE COSTA RICA

Notes to the Separate Financial Statements

		Direct		Stand-by	
		2021	2020	2021	2020
Current loan portfolio, without allowance:					
0		671,316,720	-	-	-
A1		801,016,389	-	296,018,353,493	279,560,358,007
A2		-	-	1,323,210,708	1,048,788,420
B1		-	-	3,716,967,279	2,512,673,971
B2		-	-	94,816,477	108,882,676
C1		180,517,845	-	1,352,416,738	1,051,623,112
C2		-	-	119,568,263	28,546,853
D		-	-	703,809,555	1,646,884,007
E		230,676,875	-	1,341,734,205	1,711,159,960
Carrying amount		1,883,527,829	-	304,670,876,718	287,668,917,006
Net carrying amount	¢	4,644,708,059,333	4,481,454,944,898	343,468,286,255	326,647,988,405
Allowance for loan losses (database)		(93,400,972,388)	(121,583,122,042)	(293,237,854)	(159,549,419)
(Excess) of allowance over structural allowance		(41,568,141,771)	(16,327,513,427)	(568,931,282)	(557,895,085)
Incremental direct costs related to loans		3,675,079,715	3,756,519,754	-	-
(Deferred income from loan portfolio)		(35,117,407,652)	(33,106,164,873)	-	-
Net carrying amount	¢	4,478,296,617,237	4,314,194,664,310	342,606,117,119	325,930,543,901
Restructured loans	¢	25,893,341,916	28,579,496,207	-	-

(Continued)

Set out below is an analysis of the gross and net (of allowance for loan losses) amounts of loans by risk rating, as of December 31, according to SUGEF Directive 1-05 and SUGEF Directive 15-16:

		2021	
		Loans to customers	
		Gross	Net
0	¢	38,542,571,361	37,502,326,225
A1		3,547,626,298,341	3,527,366,818,057
A2		64,839,046,769	64,503,998,476
B1		496,959,517,225	491,930,992,104
B2		19,393,633,811	19,124,251,088
C1		153,800,694,145	149,177,898,668
C2		17,461,789,224	15,542,369,130
D		124,274,772,442	111,374,110,091
E		181,809,736,015	134,784,323,106
	¢	4,644,708,059,333	4,551,307,086,945

		2020	
		Loans to customers	
		Gross	Net
0	¢	40,994,588,758	39,457,228,408
A1		3,345,716,965,669	3,310,851,971,253
A2		70,320,669,488	69,963,612,937
B1		488,272,878,369	483,483,600,669
B2		11,113,365,743	10,943,797,620
C1		109,225,670,415	106,226,875,294
C2		6,041,845,665	5,724,122,768
D		189,627,097,686	169,651,437,137
E		220,141,863,105	146,524,218,838
	¢	4,481,454,944,898	4,342,826,864,924

As shown above, as of December 31, 2021, the gross portfolio amounts to ¢4,644 billion. Of that amount, 88.89% is classified in risk ratings "A+B" and 11.11% in risk ratings "C+D+E" (2020: ¢4,481 billion, of which 88.28% is classified in risk ratings "A+B" and 11.72% in risk ratings "C+D+E").

Individually assessed loans with allowance:

Pursuant to SUGEF Directives 1-05 and 15-16, 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 for which, 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 that covers at least the outstanding balance due to the Bank. Accordingly, no allowance is established.

Restructured loans:

Through Note CNS-2020, in Article 7 of Minutes of Meeting No. 1602-2020, held on August 31, 2020, CONASSIF communicated the different considerations to be made with regard to restructured loan operations.

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. The various types of restructured loans are as follows:

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.

(Continued)

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.

Loan write-off policy:

The Bank writes off a loan (and any allowance for loan losses) 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, write-offs are generally based on the level of arrears of the loan granted.

Borrower classification

Pursuant to SUGEF Directive 1-05, borrowers are classified in two groups: Group 1, borrowers whose total outstanding balance exceeds ¢100 million, according to Note SGF-1514-2019 and Group 2, borrowers whose total outstanding balance is less than ¢100 million.

As of December 31, the loan portfolio by borrower classification is as follows:

		Direct		Stand-by	
Borrower classification		2021	2020	2021	2020
Group 1	¢	2,513,142,891,732	2,323,207,378,048	47,155,749,167	43,772,477,720
Group 2		2,131,565,167,601	2,158,247,566,850	296,312,537,088	282,875,510,685
	¢	4,644,708,059,333	4,481,454,944,898	343,468,286,255	326,647,988,405

Risk ratings

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.

For purposes of the analysis of creditworthiness, pursuant to SUGEF Directive 1-05, borrowers in Group 1 are 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 are classified based on arrears and historical payment behavior:

Risk rating	Arrears	Historical payment behavior	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 or Level 2 or Level 3
C2	90 days or less	Level 1 or Level 2	Level 1 or Level 2 or Level 3
D	120 days or less	Level 1 or Level 2	Level 1 or Level 2 or Level 3 or Level 4
E	More than 121 days	Level 1 or Level 2	Level 1 or Level 2 or Level 3 or Level 4

Through that set forth in SUGEF Directive 15-16 to calculate specific allowances, risk ratings 2 to 6 for the microfinance, development and second-tier banking portfolios are subject to specific allowances according to the percentages in the following table:

Risk rating	Specific allowance percentage (uncovered portion)
1	0%
2	5%
3	25%
4	50%
5	70%
6	100%

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

(Continued)

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.

Borrowers are to be assigned a risk rating of E if they fail to meet the conditions for any of the risk ratings defined above, are in a state of bankruptcy, meeting of creditors, court protected reorganization procedure or takeover or if the Bank considers assignment of such rating to be appropriate.

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:

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 CIC.

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.

<u>Structural allowance for loan losses</u>

Pursuant to Article 12 of SUGEF Directive 1-05, the specific allowance is calculated on the covered and uncovered balance of each loan operation. The allowance on the uncovered balance is equivalent to the total outstanding balance of each loan operation less the adjusted weighted value of the corresponding guarantee, multiplying the resulting amount by the allowance percentage corresponding to the risk rating of the borrower or co-borrower in the lowest risk rating. 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 should be used in accordance with Article 13 of SUGEF Directive 1-05.

The allowance for the covered portion of each loan operation is equivalent to the result of multiplying the covered amount by the corresponding allowance percentage pursuant to Article 12 of SUGEF Directive 1-05.

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

Weightings lower than 100% apply for all guarantees except for the guarantees mentioned in subsections d. through r. of Article 14 of SUGEF Directive 1-05. Weightings mentioned in subsection s. apply for trust assets whose nature corresponds to that of the assets mentioned in subsections a. through c. of Article 14 of SUGEF Directive 1-05.

Specific allowance percentages based on borrower risk rating are as follows:

Risk rating	Specific allowance percentage - Uncovered portion	Specific allowance percentage - Covered portion
A1	0%	0.00%
A2	0%	0.00%
B1	5%	0.50%
B2	10%	0.50%
C1	25%	0.50%
C2	50%	0.50%
D	75%	0.50%
E	100%	0.50%

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:

Arrears	Specific allowance percentage - Uncovered portion	Specific allowance percentage - Covered portion	Creditworthiness (Group 1 borrowers)	Creditworthiness (Group 2 borrowers)
Current	5%	0.50%	Level 1 Level 1	Level 1 Level 1
30 days or less	10%	0.50%	Level 1	Level 1
60 days or less	25%	0.50%	Level 1 or Level 2	Level 1 or Level 2
90 days or less	50%	0.50%	Level 1 or Level 2 or Level 3 or Level 4	Level 1 or Level 2 or Level 3 or Level 4
More than 90 days	100%	0.50%	Level 1 or Level 2 or Level 3 or Level 4	Level 1 or Level 2 or Level 3 or Level 4

Once Article 12 of these Regulations enters into effect and until December 31, 2022, the balance of the allowances recorded for borrowers in risk rating E whose historical payment behavior is classified in level 3 cannot be decreased due to this amendment.

(Continued)

Decreased amounts may only be reassigned to increases in specific allowances for borrowers reclassified to risk ratings C1, C2, D and E, in conformity with Articles 10 and 11 of SUGEF Directive 1-05.

In accordance with Article 11 bis of SUGEF Directive 1-05, at each month-end, the Bank must book the general allowance for a minimum of 0.50% of the total outstanding balance of loan operations rated A1 and A2, without reducing the effect of guarantees. The provisions of Article 13 of the aforementioned directive shall be applied to the principal balance of stand-by credits.

General allowance percentages, based on borrower risk ratings, are as follows:

Risk rating	General allowance	Specific allowance percentage - Uncovered portion	Specific allowance percentage - Covered portion
A1	0.5%	0%	0%
A2	0.5%	0%	0%
B1	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%

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.

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

	2021		
	Allowance booked	Structural allowance	Excess of allowance
Allowance for direct loans	¢ 134,968,774,515	(93,400,972,388)	41,567,802,127
Allowance for stand-by credits	862,169,136	(293,237,854)	568,931,282
	135,830,943,651	(93,694,210,242)	42,136,733,409
Counter-cyclical allowance per SUGEF Directive 19-16	339,644	(339,644)	-
	¢ 135,831,283,295	(93,694,549,886)	42,136,733,409

	2020		
	Allowance booked	Structural allowance	Excess of allowance
Allowance for direct loans	¢ 137,910,635,470	(121,583,122,042)	16,327,513,428
Allowance for stand-by credits	717,444,504	(159,549,419)	557,895,085
	138,628,079,974	(121,742,671,461)	16,885,408,513
Counter-cyclical allowance per SUGEF Directive 19-16	16,899,881,635	(16,899,881,635)	-
	¢ 155,527,961,609	(138,642,553,096)	16,885,408,513

(Continued)

Counter-cyclical allowance

As of December 31, 2021, the counter-cyclical allowance is valued pursuant to the provisions set forth in SUGEF Directive 19-16 *Regulations to Determine and Book Counter-cyclical Allowances.*

The percentage to be applied to the counter-cyclical allowance will increase gradually, as follows:

Date of application	Percentage
Starting from the effective date	5.00%
From June 1, 2019	6.00%
From June 1, 2020	7.00%

Through note SGF-0902-2020 dated March 16, 2020, SUGEF communicated the decrease in the percentage (over monthly income) used to determine the counter-cyclical allowance to 0.00%.

Through Directive No. CNS 1617-2020 dated November 2, 2020, SUGEF suspended the application of the counter-cyclical regulation until December 31, 2021.

Moreover, according to Directive No. CNS 1697-09 dated November 4, 2021, from December 1, 2020 to December 31, 2022, the accrual of counter-cyclical allowances was suspended, and the balance accumulated in counter-cyclical allowances may only be reclassified to increases in specific allowances for borrowers reclassified to risk ratings C1, C2, D and E, in conformity with Articles 10 and 11 of SUGEF Directive 1-05 and categories 4, 5 and 6 according to Section 2 of Appendix 3 "Standard Methodology" of SUGEF Directive 15-16.

As of December 31, 2021, the impairment of the portfolio due to high risk is calculated at ¢48,171,191,798, which corresponds to 11,149 loan operations for 6,209 customers.

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
c. pre-approved lines of credit: 0.50.

(Continued)

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:

Arrears	Allowance percentage
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%

As of December 31, 2021, the carrying amount of the allowance for impairment of foreclosed assets and per legal requirements amounts to ¢58,895,478,390 (2020: ¢66,534,513,087).

As of December 31, the concentration of the loan portfolio by sector is as follows:

		Direct		Stand-by	
Sector		2021	2020	2021	2020
Trade	¢	340,473,557,751	379,463,153,164	-	3,017,935
Services		1,066,248,297,108	906,583,636,691	49,369,427,583	49,569,772,348
Financial services		91,710,012,724	86,857,848,511	-	-
Mining		463,219,351	753,419,319	-	-
Manufacturing and quarrying		161,949,182,481	158,480,352,048	-	-
Construction		95,457,153,513	98,863,810,146	-	-
Agriculture and forestry		120,134,227,469	123,368,032,357	-	1,492,879
Livestock, hunting and fishing		75,220,662,863	76,171,294,935	-	-
Electricity, water, sanitation and other related sectors		467,119,681,713	485,460,973,865	-	-
Transportation and telecommunications		46,304,154,866	49,921,304,397	-	-
Housing		1,381,183,646,828	1,354,761,821,842	-	2,593,374
Personal or consumer		517,677,562,806	550,280,943,005	293,974,025,048	276,948,161,869
Tourism		280,766,699,860	210,488,354,618	124,833,624	122,950,000
	¢	4,644,708,059,333	4,481,454,944,898	343,468,286,255	326,647,988,405

As of December 31, the concentration of financial assets by geographic location is as follows:

	Direct		Stand-by	
	2021	2020	2021	2020
Central America	¢ 4,644,708,059,333	4,481,454,944,898	343,468,286,255	326,647,988,405

As of December 31, the loan portfolio by type of guarantee is as follows:

	Direct		Stand-by	
Type of guarantee	2021	2020	2021	2020
Back-to-back	¢ 45,944,028,635	14,462,451,860	-	77,323,706
Assignment of loans	82,199,355	366,052,563,056	-	-
Mortgage	2,082,343,389,235	1,767,875,598,982	4,175,098	11,562,863
Surety	410,984,548,962	883,957,113,887	-	1,492,879
Trust	538,911,400,470	394,175,395,892	-	-
Securities	29,922,331,740	1,340,225,185	-	-
Chattel mortgage	661,670,261,950	245,206,238,982	-	-
Other	874,849,898,986	808,385,357,054	343,464,111,157	326,557,608,957
	¢ 4,644,708,059,333	4,481,454,944,898	343,468,286,255	326,647,988,405

Guarantees:

a. Collateral: 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.

b. Personal: 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 December 31, 2021, 72.34% of the loan portfolio is secured by collateral guarantees (2020: 57.36%).

(Continued)

As of December 31, the concentration of the loan portfolio by individual borrower is as follows:

		Direct		Stand-by	
Loan portfolio concentration		2021	2020	2021	2020
¢1 to ¢3,000,000	¢	138,640,552,337	143,057,915,999	92,372,411,843	88,276,491,489
¢3,000,001 to ¢15,000,000		542,847,559,412	589,277,545,311	196,460,173,611	185,296,924,889
¢15,000,001 to ¢30,000,000		445,945,710,824	459,655,550,913	9,757,761,720	8,263,896,245
¢30,000,001 to ¢50,000,000		479,948,173,158	480,332,944,460	3,131,659,455	3,074,056,796
¢50,000,001 to ¢75,000,000		441,898,045,609	431,573,716,770	2,405,279,653	2,233,789,511
¢75,000,001 to ¢100,000,000		225,120,354,852	210,252,851,249	1,012,954,392	1,218,269,706
¢100,000,001 to ¢200,000,000		234,955,168,985	243,832,073,173	3,471,414,031	3,446,405,182
More than ¢200,000,000		2,135,352,494,156	1,923,472,347,023	34,856,631,550	34,838,154,587
	¢	4,644,708,059,333	4,481,454,944,898	343,468,286,255	326,647,988,405

As of December 31, 2021, the portion of the loan portfolio (direct and stand-by loans) corresponding to economic interest groups amounts to ¢667,081,705,255, which is 14.36% of the loan portfolio (2020: ¢727,628,325,075, which is 16.40% of the loan portfolio).

For credit risk management purposes, the Bank applies an internal model to estimate the loan portfolio's expected credit losses (ECL) 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).

(Continued)

The Bank's loan portfolio is comprised of operations in various currencies, i.e. the Costa Rican colon, the US 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 collection, 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.

As of December 31, 2021 and 2020, all economic activities showed increases in the VaR of the loan portfolio, especially in activities such as livestock, transport, industry, consumer and trade. These increases are the result of higher levels of arrears in the loan portfolios for those activities, due to the difficult economic situation faced by the country in relation to the COVID-19 pandemic.

i. *Investments in financial instruments*

With the entrance into effect of SUGEF Directive 30-18 *Regulation on Financial Information* (RFI), Article 18 requires regulated entities to calculate estimated credit losses for their investment portfolios. This calculation has been performed monthly since January 2020 for the Bank's investments.

The Bank has a classification of its instruments aligned with the three business models defined and updated during the first quarter of 2021. The calculation of ECL applies only to instruments measured at amortized cost and instruments measured at fair value through other comprehensive income (FVOCI). For instruments measured at fair value through profit or loss, expected credit losses are not calculated for impairment of the issuer's credit.

(Continued)

Instruments classified under model 1 (measured at amortized cost) are held to collect contractual cash flows and give rise to cash flows that are solely payments of principal and interest.

Instruments classified under model 2 (measured at fair value through other comprehensive income, FVOCI) are held to obtain income from collecting contractual cash flows and selling financial assets, for reinvestment or to be used to address the liquidity needs of the investments portfolio.

Instruments classified under model 3 (other assets) are held to obtain income from cash flows generated by trading the assets and are recorded at fair value through profit or loss.

As of December 31, 2021, the classification of instruments by model is as follows:

Date		Model 1 Amortized cost	Model 2 Other comprehensive income	Total estimated losses
January	¢	2,468,126,135	857,525,220	3,325,651,355
February		1,125,328,258	1,667,211,406	2,792,539,664
March		1,232,842,602	1,832,512,205	3,065,354,807
April		1,225,862,117	1,859,185,423	3,085,047,540
May		1,323,974,832	1,797,967,910	3,121,942,742
June		2,381,598,287	3,401,898,780	5,783,497,067
July		2,183,266,235	3,365,915,867	5,549,182,102
August		2,623,029,814	3,443,492,220	6,066,522,034
September		2,512,436,691	3,560,047,925	6,072,484,616
October		2,528,601,508	3,538,555,004	6,067,156,512
November		2,548,741,354	3,654,882,879	6,203,624,233
December	¢	2,591,484,174	3,565,890,660	6,157,374,834

(Continued)

As of December 31, 2020, the classification of instruments by model is as follows:

Date		Model 1 Amortized cost	Model 2 Other comprehensive income	Total estimated losses
January	¢	101,681,511	206,351,490	308,033,001
February		348,935,435	501,686,184	850,621,619
March		277,396,380	471,617,455	749,013,835
April		273,232,599	463,176,251	736,408,850
May		268,285,608	445,140,392	713,426,000
June		266,394,069	465,304,125	731,698,194
July		265,660,704	442,512,903	708,173,607
August		263,278,845	440,044,724	703,323,569
September		297,264,454	423,551,012	720,815,465
October		295,812,664	437,309,513	733,122,178
November		286,332,162	429,756,958	716,089,120
December	¢	2,346,228,146	1,053,061,145	3,399,289,291

The following table sets out information about the credit quality of financial assets measured at amortized cost as of December 31. Unless specifically indicated, for financial assets the amounts in the table represent gross carrying amounts. Explanation of the terms 'Stage 1' and 'Stage 2' is included in Note 5(b)(iii).

	12-month PD ranges		2021 Stage 1	Total
Investments at amortized cost	%	¢	913,789,586,706	913,789,586,706
Allowance			(2,591,484,174)	(2,591,484,174)
		¢	911,198,102,532	911,198,102,532

	12-month PD ranges	2020 Stage 1	Stage 2	Total
Investments at amortized cost	%	¢ 422,418,728,025	149,316,540,982	571,735,269,007
Allowance		(2,111,751,481)	(234,535,364)	(2,346,286,845)
		¢ 420,306,976,544	149,082,005,618	569,388,982,162

(Continued)

The following table sets out information about the credit quality of financial assets measured at fair value through other comprehensive income as of December 31. Unless specifically indicated, for financial assets the amounts in the table represent gross carrying amounts. Explanation of the terms 'Stage 1' and 'Stage 2' is included in Note 5(b)(iii).

	12-month PD ranges		2021 Stage 1	Total
Investments at FVOCI	%	¢	755,106,701,830	755,106,701,830
Allowance			(3,565,890,660)	(3,565,890,660)
		¢	751,540,811,170	751,540,811,170

	12-month PD ranges	2020 Stage 1	Stage 2	Total
Investments at FVOCI	%	¢ 599,919,344,513	95,704,046,053	695,623,390,566
Allowance		(910,704,198)	(142,356,947)	(1,053,061,145)
		¢ 599,008,640,315	95,561,689,106	694,570,329,421

The following table sets out information about the credit quality of financial assets measured at fair value through profit or loss as of December 31. Unless specifically indicated, for financial assets the amounts in the table represent gross carrying amounts. Explanation of the terms 'Stage 1' and 'Stage 2' is included in Note 5(b)(iii).

		2021 Stage 1	Total
Investments in financial instruments	¢	33,238,828,201	33,238,828,201
	¢	33,238,828,201	33,238,828,201

		2020 Stage 1	Total
Investments in financial instruments	¢	18,172,405,610	18,172,405,610
	¢	18,172,405,610	18,172,405,610

(Continued)

As of December 31, expected credit losses, by currency, are as follows:

		2021	
		Absolute	Relative
Colones	¢	5,681,192,790	0.57%
US dollars		476,182,044	0.08%
	¢	6,157,374,834	0.65%

		2020	
		Absolute	Relative
Colones	¢	1,145,051,047	0.075%
US dollars		2,254,238,244	0.027%
	¢	3,399,289,291	0.054%

As of December 31, investments by geographic location are as follows:

		2021		
Country		Principal	Interests	Total
Costa Rica	¢	1,095,253,611,183	16,452,390,409	1,111,706,001,592
Panama		4,516,750,000	8,224,247	4,524,974,247
United States		473,661,106,726	1,470,989,911	475,132,096,637
Canada		16,317,609,479	87,800,652	16,405,410,131
Venezuela		17,955,177,800	103,166,061	18,058,343,861
Europe		68,649,367,384	541,221,995	69,190,589,379
Asia		14,534,459,413	95,667,972	14,630,127,385
Australia		7,302,819,989	83,644,306	7,386,464,295
New Zealand		378,324,103	2,679,581	381,003,684
	¢	1,698,569,226,077	18,845,785,134	1,717,415,011,211

(Continued)

		2020		
Country		Principal	Interests	Total
Costa Rica	¢	748,438,844,170	15,435,374,673	763,874,218,843
Panama		6,142,803,937	-	6,142,803,937
United States		419,086,579,344	2,098,898,774	421,185,478,118
Mexico		192,917,281	2,652,464	195,569,745
Canada		12,812,416,361	97,418,761	12,909,835,122
Venezuela		9,904,044,511	1,200,303	9,905,244,814
Europe		71,838,020,526	550,368,328	72,388,388,854
Asia		7,383,941,737	57,019,099	7,440,960,836
Australia		8,305,922,418	88,708,745	8,394,631,163
New Zealand		372,513,753	2,563,510	375,077,263
	¢	1,284,478,004,038	18,334,204,657	1,302,812,208,695

Amounts arising from expected credit losses

- *Significant increase in credit risk*

When determining whether the credit risk of a financial instrument has increased significantly since initial recognition, the Bank shall consider reasonable and supportable information that is relevant and available without undue cost or effort, which is indicative of significant increases in credit risk since initial recognition. This includes both quantitative and qualitative information and analysis, based on the Bank's historical experience and expert credit assessment and including forward-looking information.

Using Moody's international ratings as reference, the Bank uses the following table to determine whether there has been a significant increase in credit risk:

Instrument rating at the time of purchase	Instrument rating when analyzing whether there has been a significant increase in credit risk
Aaa	A3
Aa1	A3
Aa2	Baa1
Aa3	Baa2
A1	Baa3
A2	Ba1
A3	Ba2
Baa1	Ba2
Baa2	Ba3
Baa3	B1
Ba1	B1
Ba2	B1
Ba3	B1
B1	B3
B2	B3
B3	B3

(Continued)

For issuers that only have a local rating, the same methodology is applied, using the equivalence table in effect published by CONASSIF to obtain the equivalent to international ratings.

- *Definition of default*

The Bank considers a financial asset to be in default when:

- the borrower is unlikely to pay its credit obligations to the Bank in full, without recourse by the Bank to actions such as realizing security (if any is held); or
- the borrower is more than 90 days past due on any material credit obligation to the Bank.

In assessing whether a borrower is in default, the Bank considers indicators that are mainly quantitative (e.g. overdue status and non-payment on another obligation with the Bank) and qualitative.

Inputs into the assessment of whether a financial instrument is in default and their significance may vary over time to reflect changes in circumstances.

- *Incorporation of forward-looking information*

The Bank incorporates forward-looking information into both the assessment of whether the credit risk of an instrument has increased significantly since its initial recognition and the measurement of ECL.

The Bank will formulate a base scenario of the future direction of the relevant economic variables, considering the advice of the Corporate Risk Committee, the Investments Committee, and external information and forecasts. This process entails the development of two or more additional economic scenarios and assessing their likelihood. The base scenario will represent a more likely outcome; it is aligned with information used by the Bank for other purposes such as strategic planning and budgeting. The other scenarios are one upside scenario and one downside scenario. Periodically, the Bank carries out stress testing of more extreme shocks to calibrate its determination of the upside and downside representative scenarios.

(Continued)

- *Measurement of expected credit losses*

The key inputs used into the measurement of ECL are the term structure of the following variables:

- probability of default (PD)
- loss given default (LGD)
- exposure at default (EAD).

The Bank defines these parameters using statistical models developed internally, using historical data and business-based assumptions, which are adjusted to reflect projected information, as described below:

Probability of default (PD): This is the probability that, given a risk profile, an operation will enter default over a particular time horizon. PD estimates are performed as of a certain date; the Bank calculates them through an analysis of historical information and using statistical models.

Loss given default (LGD): This is the magnitude of the likely loss if there is default. The Bank estimates LGD parameters based on a historical analysis of the recovery rates of operations that have entered into default. The model developed to calculate LGD considers the structure, collateral and recovery cost. It is calculated on a discounted cash flow basis, using the original effective interest rate of the loans as the discounting factor. The LGD may differ from the figures used for regulatory purposes, mainly due to the elimination of regulatory provisions, calibration assumptions, inclusion of forward-looking information, and the discount rate used.

Exposure at default (EAD): This measures the current and future exposure to default over the life of the loan. The Bank derives EAD from the current exposure to the counterparty and potential changes to the current amount allowed under the contract and arising from amortization. The EAD of a financial asset is its gross carrying amount at the time of default. For lending commitments, the EAD considers the potential future amounts that may be drawn under the contract, which are estimated based on historical observations and forward-looking forecasts.

(Continued)

As described above, and subject to using a maximum of 12-month PD for financial assets for which credit risk has not increased significantly, the Bank measures ECL considering the risk of default over the maximum contractual period (including any extension option for the borrower) over which it is exposed to credit risk, even when, for credit risk management purposes, the Bank considers a longer period.

- *Expected credit losses*

As of December 31, the reconciliation of the opening balance and closing balance of expected credit losses by type of instrument is as follows:

		Stage 1	Total
Investments in financial instruments			
Balance as of December 31, 2020	¢	3,399,289,291	3,399,289,291
Allowance for new investments		2,038,682,075	2,038,682,075
Decrease in allowance		(1,793,484,746)	(1,793,484,746)
Balance as of December 31, 2021	¢	6,157,374,834	6,157,374,834

		Stage 1	Total
Investment securities			
Balance as of January 1, 2020	¢	1,459,436,149	1,459,436,149
Allowance for new investments		2,434,780,200	2,434,780,200
Decrease in allowance		(494,927,058)	(494,927,058)
Balance as of December 31, 2020	¢	3,399,289,291	3,399,289,291

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 (MRD) monitors indicators such as liability structure, daily changes and trends in demand and term account balances, volatility of deposit-taking from the public (VaR of liquidity) liquidity coverage ratio (LCR), systemic liquidity indicators and variables with the greatest impact on SUGEF's term matching indicators.

LCR results are compared with the risk appetite limit approved by the General Board of Directors, which was set at 125% for the LCR in colones and in US dollars.

Below is the LCR indicator for the years ended December 2021 and 2020, during which the indicators are considerably above the risk appetite level in both currencies. This means that commitments and net cash outflows for 30 days can be met in an adverse scenario.

Year on year, the LCR indicator in colones has largely remained above 200%, closing at 201% as of December 31, 2021, which is 27 percentage points higher than the previous year (2020: it decreased 35 percentage points, closing at 174%). This is related to a 35% increase in the stock of liquid assets (HQLA) (2020: 85%), which as of December 31, 2021 and 2020 amounted to ¢429,500 and ¢86,000 million, respectively, mainly in government investments and in the local market (MIL). This affected net cash outflows, 22.1% (2020: 10.6%), which as of December 31, 2021 and 2020 were ¢135,000 and ¢56,500 million, respectively, mainly in wholesale and retail commitments. The LCR indicator remains considerably below the appetite level at 125%, equivalent to ¢542,500 million (2020: 125%, equivalent to ¢281,700 million). During 2021, there was a decrease of ¢33,600 million in credits (1.1% decrease, per annum), combined with an increase of ¢156,500 million in deposit-taking from the public (mainly checking accounts, which grew ¢454,000 million, 29%, while term certificates of deposit decreased ¢395,000, equivalent to -40%). In addition, the Bank was able to obtain a liability for ¢168,300 million through a special mechanism of the BCCR named deferred term obligation (ODP), to grant special conditions to customers due to the COVID-19 situation.

The LCR indicator in US dollars closed at 212% as of December 31, 2021 (2020: 338%), which is a significant decrease of 126% related to the payment on the commitment for an international issue of US$310 million made in April 2021 (a risk appetite of $1,020, resulting from a tender offer or prepayment on the international issue of $150 million in December 2020). This was reflected in a decrease of 21.5% in HQLA (-US$351 million, especially in investments and cash and due from banks abroad, 1A level), accompanied by an increase of 23% in net cash outflows (US$106 million, mainly due to the increase in wholesale and retail commitments). The indicator remains above the appetite level of 125%, equivalent to US$317 million.

As of December 31, the LCR indicator by currency is as follows:

Indicator	2021	2020	Variation	Level
ICL colones	174%	173.7%	0.03%	Appetite
ICL US dollars	338%	337.8%	0.02%	Appetite

This information is communicated to management in a monthly report that is reviewed by the Corporate Risk Committee and subsequently presented to the board of directors.

As of December 31, 2021, 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	¢	-	201,917,818,562	-	-	-	-	-	-	201,917,818,562
Minimum legal deposit in BCCR		-	271,696,728,654	25,401,777,557	21,644,448,863	16,865,232,640	26,249,933,203	34,610,566,781	21,780,376,782	418,249,064,480
Investments		-	-	194,693,571,177	4,625,026,035	6,296,239,370	14,636,012,871	60,944,703,356	774,978,503,987	1,056,174,056,796
Loan portfolio		198,437,826,871	-	74,588,931,544	39,409,668,189	34,045,787,656	91,608,832,764	134,066,704,901	2,615,418,712,372	3,187,576,464,297
Recovery of assets	¢	198,437,826,871	473,614,547,216	294,684,280,278	65,679,143,087	57,207,259,666	132,494,778,838	229,621,975,038	3,412,177,593,141	4,863,917,404,135
Obligations with the public	¢	-	2,856,866,642,437	175,464,474,645	139,261,158,692	89,622,358,111	205,203,495,498	254,910,149,446	180,666,976,232	3,901,995,255,061
Obligations with BCCR		-	-	-	-	-	-	-	167,292,072,119	167,292,072,119
Obligations with financial entities		-	79,732,549,491	94,697,725,498	9,360,571,079	2,504,254,373	23,136,688,315	19,229,865,988	43,438,958,914	272,100,613,658
Charges payable		-	8,380,832,576	4,404,725,303	2,415,200,767	757,225,983	2,101,127,371	1,236,033,200	2,346,024,151	21,641,169,351
Maturity of liabilities	¢	-	2,944,980,024,504	274,566,925,446	151,036,930,538	92,883,838,467	230,441,311,184	275,376,048,634	393,744,031,416	4,363,029,110,189
Difference	¢	198,437,826,871	(2,471,365,477,288)	20,117,354,832	(85,357,787,451)	(35,676,578,801)	(97,946,532,346)	(45,754,073,596)	3,018,433,561,725	500,888,293,946

As of December 31, 2020, 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	¢	-	82,022,570,186	-	-	-	-	-	-	82,022,570,186
Minimum legal deposit in BCCR		-	291,553,406,400	17,605,338,104	22,042,761,437	17,584,756,620	46,169,098,760	61,642,338,518	19,833,875,898	476,431,575,737
Investments		-	-	11,657,859,649	5,616,159,866	79,837,329,647	33,970,508,668	83,314,719,721	525,276,296,374	739,672,873,925
Loan portfolio		215,834,687,685	-	93,924,226,007	35,978,988,780	37,546,272,873	90,773,169,586	117,114,507,583	2,643,084,621,634	3,234,256,474,148
Recovery of assets	¢	215,834,687,685	373,575,976,586	123,187,423,760	63,637,910,083	134,968,359,140	170,912,777,014	262,071,565,822	3,188,194,793,906	4,532,383,493,996
Obligations with the public	¢	-	2,304,280,987,744	182,730,987,691	126,942,104,006	117,732,735,457	422,149,801,956	486,149,956,062	136,722,288,270	3,776,708,861,186
Obligations with BCCR		-	-	8,000,000,000	-	-	-	-	125,644,411	8,125,644,411
Obligations with financial entities		-	47,223,696,761	77,444,711,007	11,027,635,741	361,238,813	29,737,870,253	23,821,799,824	38,423,784,480	228,040,736,879
Charges payable		-	9,808,616,786	7,953,763,876	4,607,335,956	751,309,811	3,170,555,665	974,606,803	1,417,528,412	28,683,717,309
Maturity of liabilities	¢	-	2,361,313,301,291	276,129,462,574	142,577,075,703	118,845,284,081	455,058,227,874	510,946,362,689	176,689,245,573	4,041,558,959,785
Difference	¢	215,834,687,685	(1,987,737,324,705)	(152,942,038,814)	(78,939,165,620)	16,123,075,059	(284,145,450,860)	(248,874,796,867)	3,011,505,548,333	490,824,534,211

(Continued)

BANCO NACIONAL DE COSTA RICA

Notes to the Separate Financial Statements

As of December 31, 2021, 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	¢	-	403,733,191,111	-	-	-	-	-	-	403,733,191,111
Minimum legal deposit in BCCR		-	230,643,427,707	11,195,208,626	8,481,748,789	9,063,311,837	22,706,291,394	23,696,617,981	23,137,241,486	328,923,847,820
Investments		-	-	10,739,290,346	38,449,881,629	10,214,050,892	24,905,419,366	68,583,188,422	516,072,828,198	668,964,658,853
Loan portfolio		123,028,797,041	-	29,268,351,446	12,109,924,990	14,374,927,307	70,517,166,646	98,662,971,838	1,077,727,127,832	1,425,689,267,100
Recovery of assets	¢	123,028,797,041	634,376,618,818	51,202,850,418	59,041,555,408	33,652,290,036	118,128,877,406	190,942,778,241	1,616,937,197,516	2,827,310,964,884
Obligations with the public	¢	-	1,512,391,509,747	62,441,974,800	65,946,194,449	72,086,143,799	154,831,043,004	171,625,087,793	129,075,177,030	2,168,397,130,622
Obligations with financial entities		-	34,041,024,331	108,649,683,292	496,842,500	43,298,856	2,373,718,961	6,539,884,039	361,281,003,528	513,425,455,507
Charges payable		-	2,435,098,561	882,977,406	675,765,576	323,004,291	3,994,673,495	724,327,059	808,784,050	9,844,630,438
Maturity of liabilities	¢	-	1,548,867,632,639	171,974,635,498	67,118,802,525	72,452,446,946	161,199,435,460	178,889,298,891	491,164,964,608	2,691,667,216,567
Difference	¢	123,028,797,041	(914,491,013,821)	(120,771,785,080)	(8,077,247,117)	(38,800,156,910)	(43,070,558,054)	12,053,479,350	1,125,772,232,908	135,643,748,317

(Continued)

As of December 31, 2020, 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	¢	-	477,129,730,966	-	-	-	-	-	-	477,129,730,966
Minimum legal deposit in BCCR		-	224,052,936,167	13,123,484,701	10,509,443,406	13,824,245,689	46,896,378,576	22,774,782,880	13,225,708,486	344,406,979,905
Investments		-	-	11,946,148,648	64,236,093,725	15,380,891,441	71,347,961,563	132,909,815,806	283,071,795,297	578,892,706,480
Loan portfolio		129,691,325,464	-	27,970,864,787	13,764,812,005	19,630,831,744	36,655,292,826	45,344,967,580	944,790,731,224	1,217,848,825,630
Recovery of assets	¢	129,691,325,464	701,182,667,133	53,040,498,136	88,510,349,136	48,835,968,874	154,899,632,965	201,029,566,266	1,241,088,235,007	2,618,278,242,981
Obligations with the public	¢	-	1,248,782,498,503	95,883,459,245	63,726,520,616	64,172,846,237	138,752,077,623	115,839,661,810	85,734,085,282	1,812,891,149,316
Obligations with financial entities		-	18,887,696,410	96,204,771,877	687,610,470	645,078,500	194,402,257,716	25,612,886,418	332,535,683,074	668,975,984,465
Charges payable		-	2,732,172,789	1,137,630,010	840,188,925	843,060,678	5,823,049,192	741,129,349	899,633,302	13,016,864,245
Maturity of liabilities	¢	-	1,270,402,367,702	193,225,861,132	65,254,320,011	65,660,985,415	338,977,384,531	142,193,677,577	419,169,401,658	2,494,883,998,026
Difference	¢	129,691,325,464	(569,219,700,569)	(140,185,362,996)	23,256,029,125	(16,825,016,541)	(184,077,751,566)	58,835,888,689	821,918,833,349	123,394,244,955

(Continued)

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 so as to maintain a risk appetite (risk limits approved by the board of directors), or as determined in SUGEF directives, while optimizing the return.

Indicator	Limit	Level
Consolidated VaR	2.00%	Appetite
Currency risk	3.50%	Appetite
Interest rate risk – colones	2.00%	Appetite
Interest rate risk – foreign currency	2.00%	Appetite

The main indicator used is the market VaR of the Bank's investments, which is measured by means of an internal methodology and quantified for each currency in which the Bank holds positions. That indicator is complemented with the duration and return, which show the Bank's risk-return profile derived from holding an investment portfolio.

The Market Risk Division periodically analyzes and follows-up on the investment portfolio on a periodic basis through the Comprehensive Risk Assessment Report, which is submitted to the Corporate Risk Committee and the board of directors.

As of December 31, the portfolios by currency are as follows:

	Face value of investments by currency		
Currency	2021	2020	Variation
Colones	989,410,200,000	696,014,400,000	293,395,800,000
US dollars - local issuers	84,885,160	17,819,000	67,066,160
US dollars - international issuers	922,753,000	850,647,000	72,106,000

(Continued)

As of December 31, 2021, due to the discontinuation of the LIBOR rate as a global reference rate, financial institutions are making significant efforts to determine alternative reference rates. Specifically, the Bank is currently developing a project named "Libor rate substitution", which aims to migrate the Bank's asset and liability operations to reference rates such as the prime rate or 6-month interbank rate. This project began in August 2020 and will continue at least until December 2022.

The strategy is to prioritize loans with the largest balances and longest terms until maturity, most of which are in the Corporate & Institutional and Medium Enterprise segments. All customers in the Corporate and Institutional segment have been approached, of which 20% accepted the transfer, 24% indicated that they are going to make the decision during 2022 and the remaining 56% will wait until the LIBOR rate ceases to be published to be make a decision. For Medium Enterprises, the transfer process had to be paused due the reclassification of customers. The reclassification has been completed; therefore, the process will be resumed during March 2022.

For the BN Desarrollo y Personas segments, customers began to be contacted and transferred in October 2021. Although it is one the largest sectors, only 175 customers have been contacted thus far. The Bank expects to be able to adjust the process and be able to approach a much larger number of customers in March 2022.

It is also worth noting that steps have been taken by the banking sector (Chamber of Banks, SUGEF, Costa Rican Banking Association, BCCR, among other) to generate trust among the population regarding the use of the interbank rate in US dollars.

- *Market risk of investments*

As of December 31, the Bank's consolidated VaR regarding the market value of investments is at the risk appetite level. There was a decrease of 0.42% during the last year, mainly due to the downward trend of the curves.

Type of risk	2021	2020	Variation
VaR - consolidated	0.44%	0.39%	0.05%

- *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 the Bank does not have the necessary flexibility to make a timely adjustment.

The Market Risk Division monitors this risk regularly through the indicators established by SUGEF Directive 24-00 and reports monthly on its performance to the Bank's Corporate Risk Committee. As of December 31, interest rate risk is as follows:

Type of risk	2021	2020	Variation	Level
Interest rate risk in colones	0.18%	0.59%	-0.41%	Normal
Interest rate risk in foreign currency	0.04%	0.15%	-0.11%	Normal

For the Bank, both indicators closed considerably below SUGEF's regulatory limits and the risk appetite approved by the board of directors.

The interest rate risk indicator in colones increased mainly due to the increase in the duration of equity in local currency. In US dollars, the decrease corresponds to the combined effect of a decrease in the duration of equity and lower volatility in the 3-month LIBOR rate.

As of December 31, 2021, 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 days	31 to 90 days	91 to 180 days	181 to 360 days	361 to 720 days	More than 720 days	Total
Local currency (LC)								
Investments	¢	194,693,571,177	10,921,265,405	14,636,012,871	60,944,703,356	371,933,005,325	403,045,498,662	1,056,174,056,796
Loan portfolio		2,705,191,227,790	108,843,805,791	103,821,839,006	14,774,010,382	15,449,203,410	96,246,511,122	3,044,326,597,501
Recovery of rate-sensitive assets LC (A)	¢	2,899,884,798,967	119,765,071,196	118,457,851,877	75,718,713,738	387,382,208,735	499,292,009,784	4,100,500,654,297
Obligations with the public	¢	275,310,206,765	244,169,508,245	230,441,311,183	273,233,954,212	104,814,761,226	88,505,568,024	1,216,475,309,655
Obligations with BCCR			-	-	-	-	168,243,245,538	168,243,245,538
Obligations with financial entities		42,198,364	-	-	-	-	34,352,702,356	34,394,900,720
Maturity of rate-sensitive liabilities LC (B)	¢	275,352,405,129	244,169,508,245	230,441,311,183	273,233,954,212	104,814,761,226	291,101,515,918	1,419,113,455,913
Difference in LC, recovery of assets less maturity of liabilities (A - B)	¢	2,624,532,393,838	(124,404,437,049)	(111,983,459,306)	(197,515,240,474)	282,567,447,509	208,190,493,866	2,681,387,198,384
Foreign currency (FC)								
Investments	¢	7,487,984,481	51,872,813,974	17,100,363,502	72,914,654,087	335,186,210,074	176,678,928,300	661,240,954,418
Loan portfolio		1,204,199,665,568	44,848,008,902	26,230,017,191	2,883,719,639	24,093,622,164	67,952,603,036	1,370,207,636,500
Recovery of rate-sensitive assets FC (C)	¢	1,211,687,650,049	96,720,822,876	43,330,380,693	75,798,373,726	359,279,832,238	244,631,531,336	2,031,448,590,918
Obligations with the public	¢	172,491,092,816	139,557,064,120	160,676,665,595	176,753,860,348	273,343,894,813	100,157,006,766	1,022,979,584,458
Obligations with entities		-	-	517,224,380	635,197	64,525,000,000	55,281,406,600	120,324,266,177
Maturity of rate-sensitive liabilities FC (D)	¢	172,491,092,816	139,557,064,120	161,193,889,975	176,754,495,545	337,868,894,813	155,438,413,366	1,143,303,850,635
Difference in FC, recovery of assets less maturity of liabilities (C - D)		1,039,196,557,233	(42,836,241,244)	(117,863,509,282)	(100,956,121,819)	21,410,937,425	89,193,117,970	888,144,740,283
Recovery of rate-sensitive assets 1/ (A + C)	¢	4,111,572,449,016	216,485,894,072	161,788,232,570	151,517,087,464	746,662,040,973	743,923,541,120	6,131,949,245,215
Maturity of rate-sensitive liabilities 2/ (B + D)	¢	447,843,497,945	383,726,572,365	391,635,201,158	449,988,449,757	442,683,656,039	446,539,929,284	2,562,417,306,548
Difference in LC + FC, recovery of assets less maturity of liabilities (item 1 - item 2)	¢	3,663,728,951,071	(167,240,678,293)	(229,846,968,588)	(298,471,362,293)	303,978,384,934	297,383,611,836	3,569,531,938,667

(Continued)

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As of December 31, 2020, 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 days	31 to 90 days	91 to 180 days	181 to 360 days	361 to 720 days	More than 720 days	Total
Local currency (LC)								
Investments	¢	11,657,128,603	85,440,897,308	33,970,508,668	83,314,719,721	132,669,483,756	392,606,812,618	739,659,550,674
Loan portfolio		2,743,482,999,690	110,423,768,268	105,350,643,410	15,136,734,335	15,884,604,463	112,257,528,434	3,102,536,278,600
Recovery of rate-sensitive assets LC (A)	¢	2,755,140,128,293	195,864,665,576	139,321,152,078	98,451,454,056	148,554,088,219	504,864,341,052	3,842,195,829,274
Obligations with the public	¢	269,359,097,533	261,671,099,024	455,073,627,874	507,422,182,715	90,309,475,049	59,726,094,950	1,643,561,577,145
Obligations with BCCR		8,000,666,667	-	-	-	-	125,644,412	8,126,311,079
Obligations with financial entities		63,322,482	-	-	-	-	30,060,611,046	30,123,933,528
Maturity of rate-sensitive liabilities LC (B)	¢	277,423,086,682	261,671,099,024	455,073,627,874	507,422,182,715	90,309,475,049	89,912,350,408	1,681,811,821,752
Difference in LC, recovery of assets less maturity of liabilities (A - B)	¢	2,477,717,041,611	(65,806,433,448)	(315,752,475,796)	(408,970,728,659)	58,244,613,170	414,951,990,644	2,160,384,007,522
Foreign currency (FC)								
Investments	¢	11,928,388,819	79,595,991,040	68,553,486,093	130,311,541,092	89,222,251,890	183,540,999,087	563,152,658,021
Loan portfolio		1,022,312,659,394	38,059,824,746	22,189,477,129	2,433,689,688	20,522,320,483	58,557,755,761	1,164,075,727,201
Recovery of rate-sensitive assets FC (C)	¢	1,034,241,048,213	117,655,815,786	90,742,963,222	132,745,230,780	109,744,572,373	242,098,754,848	1,727,228,385,222
Obligations with the public	¢	193,170,311,829	130,915,305,426	338,556,655,735	120,826,759,867	49,069,401,401	277,902,215,214	1,110,440,649,472
Obligations with entities		691,865,056	-	420,728,957	20,577,578,182	-	93,219,460,680	114,909,632,875
Maturity of rate-sensitive liabilities FC (D)	¢	193,862,176,885	130,915,305,426	338,977,384,692	141,404,338,049	49,069,401,401	371,121,675,894	1,225,350,282,347
Difference in FC, recovery of assets less maturity of liabilities (C - D)	¢	840,378,871,328	(13,259,489,640)	(248,234,421,470)	(8,659,107,269)	60,675,170,972	(129,022,921,046)	501,878,102,875
Recovery of rate-sensitive assets 1/ (A + C)	¢	3,789,381,176,506	313,520,481,362	230,064,115,300	231,196,684,836	258,298,660,592	746,963,095,900	5,569,424,214,496
Maturity of rate-sensitive liabilities 2/ (B + D)	¢	471,285,263,567	392,586,404,450	794,051,012,566	648,826,520,764	139,378,876,450	461,034,026,302	2,907,162,104,099
Difference in LC + FC, recovery of assets less maturity of liabilities (item 1 - item 2)	¢	3,318,095,912,939	(79,065,923,088)	(563,986,897,266)	(417,629,835,928)	118,919,784,142	285,929,069,598	2,662,262,110,397

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d) *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.

The Bank's Asset and Liability Committee (ALCO) decided to take a neutral foreign currency position, which has been ratified annually by the Bank's Corporate Risk Committee. This is to protect the Bank from any variation in the foreign currency position, which is monitored daily by the Market Risk Division.

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

The Bank calculates the SUGEF currency risk indicator on a monthly basis, which remained at the appetite level for both years. The indicator has increased due to an increase in the foreign currency position and a greater volatility of the exchange rate, which is reflected in an increase in the expected variation of the US dollar. As of December 31, the indicator is as follows:

Type of risk	2021	2020	Variation	Level
Currency risk	0.81%	2.48%	-1.67%	Normal

In addition to the regulatory currency risk indicator, the Bank's Market Risk Division calculates another currency risk indicator for management and monitoring purposes. A VaR of exchange rate is created based on the exposure level and foreign exchange rate stress scenarios.

The VaR of exchange rate measures the losses that a financial entity could have (using a certain probability and a 1-month time horizon) due to a mismatch of its assets and liabilities in foreign currency, in the event of exchange rate fluctuations.

Inputs used to measure the VaR of exchange rate include the exchange rate at a specific time and time horizon, the net position in foreign currency (difference between assets and liabilities in foreign currency) and the percentage variation in the exchange rate at different time periods and the base capital.

(Continued)

The VaR of exchange rate assumes that the exchange rate risk exists only if there is a mismatch between assets and liabilities in foreign currency. The variation in the exchange rate corresponds to the 5th and 95th percentiles of the distribution of projected variations in exchange rates taken from an exchange rate model.

With the calibrated model and through Montecarlo simulations, exchange rate forecasts are created for different periods. The 5th and 95th percentiles of the distribution of those forecasts are used as the percentage variation of the exchange rate in order to calculate the indicator of the VaR of exchange rate.

The result is as follows:

Internal currency risk	December 2021	December 2020	Level
5th percentile	0.11%	0.17%	Normal
95th percentile	0.19%	0.35%	Normal

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As of December 31, assets and liabilities denominated in foreign currency are as follows:

		US dollars	
		2021	2020
Assets:			
Cash and due from banks	US$	1,080,187,048	1,281,459,755
Investments in financial instruments		1,036,752,668	937,781,802
Loan portfolio		2,137,642,423	1,894,388,418
Accounts and accrued interest receivable		618,457	399,411
Investments in other companies		118,964,964	117,246,755
Other assets		2,131,248	25,347,277
	US$	4,376,296,808	4,256,623,418
Liabilities:			
Obligations with the public	US$	3,321,683,148	2,903,543,514
Obligations with entities		798,043,795	1,090,042,117
Accounts payable and provisions		9,792,719	9,532,964
Other liabilities		13,382,866	32,469,283
Subordinated obligations		90,456,989	98,736,454
	US$	4,233,359,517	4,134,324,332
Excess of assets over liabilities in US dollars	US$	142,937,291	122,299,086

		Euro	
		2021	2020
Assets:			
Cash and due from banks	€	48,713,203	40,220,554
Other assets		-	30,165
	€	48,713,203	40,250,719
Liabilities:			
Obligations with the public	€	43,973,053	38,083,562
Obligations with entities		1,572,939	953,016
Accounts payable and provisions		2,857	17,250
Other liabilities		2,432,526	511,411
	€	47,981,375	39,565,239
Excess of assets over liabilities in euro	€	731,828	685,480

(Continued)

		DU	
		2021	2020
Assets:			
Loan portfolio	UD	1,053,411	2,224,119
	UD	1,053,411	2,224,119
Liabilities:			
Accounts payable and provisions		94,411	189,463
	UD	94,411	189,463
Excess of assets over liabilities in DU	UD	959,000	2,034,656

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 ALCO.

As of December 31, the valuation in colones of monetary assets and liabilities in foreign currency gave rise to foreign exchange gains and losses, as follows:

		2021	2020
Foreign exchange gains	¢	216,116,001,162	410,341,532,330
Foreign exchange losses		(215,817,332,914)	(411,346,527,142)
Net gains (losses)	¢	298,668,248	(1,004,994,812)

As of December 31, the valuation of other assets and other liabilities gave rise to gains and losses, which are booked in "Other operating income" and "Other operating expenses", respectively, as follows:

		2021	2020
Gains on valuation of other assets, net (Note 39)	¢	171,701,168	1,130,256,775
Losses on valuation of other liabilities, net (Note 42)		(286,917,462)	(1,410,449,477)
Net losses	¢	(115,216,294)	(280,192,702)

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

e) *Operational risk*

Operational risk is the risk of potential loss resulting from failures or deficiencies in processes, personnel, information systems, internal controls and external events. This definition includes legal risk, but excludes strategic, business and reputational risks. In addition, the existing methodologies incorporate the criteria and best practices regarding the taxonomy and classification of operational risks established as recommendations and best practices by the Basel Committee.

The policy adopted by the Bank stipulates that all of the Bank's employees are responsible for managing operational risk. The Bank's employees are also required to comply with the policies, regulations, procedures and controls applicable to their positions at all times 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 management framework that includes:

- defining operational risk and best practices
- goals of the operational risk function
- institutional principles to manage operational risk
- roles and relationships
- specific framework to manage legal risk.

Furthermore, the Bank has defined operating policies related to the implementation of new products, services and operations in relation to fraud management and the reporting of operational risk events.

The Information Security and Business Continuity functions fall within the scope of operational risk, in conformity with SUGEF Directive 18-16 *Regulations on operational risk management*.

One of the Bank's fundamental principles for operational risk management is transparency, which means that all risk events should be identified, documented, and reported 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.

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The operational risk management's main activity is the valuation 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.

For legal risk, the Bank applies a model that permits estimating the expected losses and VaR of lawsuits, considering the expert opinion of the legal counsel, the subject matter of the cases when calculating the probability of an unfavorable ruling and a continuous model for the duration of the lawsuits. This model provides a direct estimate of the duration of each lawsuit in the corresponding court and the possible outcomes. The results obtained are used to contemplate 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.

Capital management:

Regulatory capital

The Bank's capital must always comply with the capital adequacy indicators established by SUGEF, which require that banks maintain a Capital Adequacy Ratio (CAR) of at least 10%. That ratio is calculated by dividing the Bank's base capital by total risk-weighted exposures.

Management periodically monitors these requirements and reports to the board of directors on compliance. As of December 31, 2021 and 2020, the Bank is above the minimum level required by applicable regulations.

As of December 31, the Bank's Tier I and Tier II capital (regulatory capital) is as follows:

		2021	2020
Tier I capital:			
Ordinary paid-in capital	¢	172,237,030,102	172,237,030,102
Legal reserve		364,737,238,098	381,362,590,326
		536,974,268,200	553,599,620,428
Tier II capital:			
Adjustment for revaluation of property and equipment		48,128,754,723	42,107,329,540
Adjustment for valuation of available-for-sale investments		11,061,423,302	10,534,057,857
Adjustment for valuation of restricted financial instruments		-	2,869,322
Adjustment for valuation of investments in other companies		18,017,127,401	12,656,221,858
Prior-period retained earnings		40,386,334,461	11,005,359,016
Income for the year		19,152,075,605	14,734,575,073
Equity of FOFIDE		41,687,504,022	39,043,365,123
		178,433,219,514	130,083,777,789
Less: Deductions		(124,465,643,338)	(117,705,861,796)
Regulatory capital	¢	590,941,844,376	565,977,536,421

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The Bank's capital, including the capital of its statutorily created departments, may be increased by law or by capitalization of earnings. In the latter case, the capitalization must be approved by the board of directors of BCCR based on a report issued by SUGEF.

Financial entities regulated by SUGEF may increase their capital by amending their Articles of incorporation and paying such increases in full. Such entities may also decrease their capital, provided that it remains above the minimum required by law.

In accordance with Article 135 of the Internal Regulations of BCCR, CONASSIF will establish limits for credit operations, whether direct or stand-by, that financial entities regulated by SUGEF may enter into with individuals or legal entities under the modalities offered by regulated entities.

The maximum limit will be equivalent to twenty percent (20%) of the entity's subscribed and paid-in capital and its non-redeemable capital reserves. Regulated entities may internally define their own limits, provided that such limits adhere to the above parameters and do not exceed the maximum limits established by CONASSIF.

From January 1, 2007 in order to comply with the disclosure of objectives, policies, and procedures for managing capital and quantitative information. The Bank and its subsidiaries adhere to SUGEF's Chart of Accounts, Articles 10, 11, and 12 of IRNBS, Decision AGB 8-86, *Regulations for Authorizing the Organization, Opening, and Operation of Private Banks*, and SUGEF official communication 043-2005.

The Bank's own contributions to share capital and amounts capitalized from other equity accounts are recognized in share capital (account No. 310) in accordance with Article 11 of IRNBS. Debits and credits applied against that account must be generated by operations that comply with all legal requirements for modifying the entity's capital and that have been approved by BCCR or CONASSIF, as appropriate.

Article 11 of the aforementioned regulations establishes that banks must use the calendar year as their financial year and that gains and losses be presented on a net basis at the close of the last business day of each half of the year must be liquidated. Such liquidations must be reported to SUGEF.

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The main purpose of capital management is to maintain an appropriate CAR that is above the current minimum level of 10% established in SUGEF Directive 3-06 "Regulations on Capital Adequacy of Financial Entities".

Internally, as a prudential measure to protect capital, the general board of directors adopted a policy establishing a floor of 10.50%, which exceeds the regulation's requirements by 50 basis points. At the administrative level, in 2007 the floor and ceiling were set at 11.50% and 13.50%, respectively, to assess the actions of those with direct responsibility for monitoring the performance of the Bank's CAR for purposes of efficient capital management.

As part of the Bank's approach to capital management, the Bank's CAR is monitored monthly and reported to the general board of directors in a detailed financial report that covers all main items of interest: separate statement of financial position, separate statement of comprehensive income, CAMELS indicators, budget execution, and capital adequacy.

As of December 31, 2021 and 2020, the Bank's CAR is above the minimum level required by applicable regulations, which indicates that capital levels are above the minimum required by laws and regulations.

Moreover, in applying Law No. 8627 published in the Official Gazette on December 23, 2008, effective immediately, the Government of Costa Rica capitalized State-owned banks. As part of that capitalization, the Bank received Central Bank bonds in DU for a total of DU42,165,060, equivalent to ¢27,618,957,837, which was credited against the "Paid-in capital" account (account No. 311) (see Note 26).

COVID 19 implications for the Bank

The Coronavirus (COVID-19) pandemic, declared as such by the World Health Organization, has international implications. On one hand, it has caused a large number of deaths. On the other hand, markets and productive sectors have been heavily affected, due to the fear of rapid spread of the disease and to the preventive measures taken by some governments, including: social distancing, cancellation of mass events, decrease in interest rates, closing of borders, among other. This has strongly impacted the countries' economies and their production dynamic.

According to the IMF, the recovery of the global economy will be faster than initially expected, with growth projections for 2021 and 2022 up to 6% and 4.4%, respectively, thanks to economic stimulation measures by governments such as that of the United States, as well progress with vaccination, although it has alerted of differences in the rate of recovery between different countries and economic sectors.

Factors that could affect the projected growth include delays in the implementation of vaccination programs and difficulties controlling new SARS-CoV-2 variants. As of December 2021, it is estimated that more than 3,400 million vaccine doses have been applied and 940 million people are fully vaccinated, which represents 12% of the global population.

The main changes and concerns for the Bank are detailed below. They have been mitigated by the state of emergency declared by the Government of Costa Rica on March 16, 2020.

(a) Financially

- Low demand for credit
- Higher levels of arrears and delinquency by customers
- Increase in allowances for loan losses
- Impact on financial margin (lower rate)
- Decrease in service fees and commissions and merchant acquisition
- Impact on equity ratio

(b) Credit risk

- A simplified processing system was established for payment arrangements, extensions, and restorations, offered to specific customer profiles
- Strengthening of collections management
- Ongoing monitoring of internal policies and guidelines in order to promote effective payment arrangements with customers
- Monitoring market conditions to identify possible impacts, given the country's economic, political and sanitary circumstances.

(Continued)

(c) Interest rate risk

- Ongoing monitoring of interest rate indicators
- Promote the use of the interbank rate (TRI) as reference for loans since it best reflects market conditions.
- Perform stress testing on interest rates.

(d) Liquidity risk

- Daily monitoring of the main liquidity indicators
- Potential lines of credit with foreign entities have been processed
- Weekly stress testing of liquidity indicators
- The liquidity coverage ratio for 5 and 10 days is sent weekly as part of the information requested by the Central Bank for analysis of the last-minute loan requests.

(e) Price risk

- Ongoing monitoring of concentration of instruments in the investment portfolio by currency, sector, rating, among other
- Monitoring of prices and ratings of local and international securities
- Constant monitoring of the main price risk indicators, including internal VaR and SUGEF VaR, as well as stress testing to determine possible impacts on solvency ratios

(f) Currency risk

- Periodic monitoring of systemic indicators to analyze the exchange rate. It is presented to the board of directors weekly.

These measures are constantly being reviewed in order to adjust them to changing market conditions and to foresee risks.

(Continued)

(7) Collateralized or restricted assets

As of December 31, collateralized or restricted assets are as follows:

Restricted asset	Cause of restriction		2021	2020
Cash and due from banks:				
Checking account – colones (Note 9)	Minimum legal deposit	¢	486,421,991,516	471,119,415,447
Checking account – US dollars (Note 9)	Minimum legal deposit		333,197,818,556	303,912,606,319
Checking account – euro (Note 9)	Minimum legal deposit		4,919,236,524	4,365,899,890
Other cash and due from banks (Note 9)	Custody of BCAC Liabilities		-	1,142,835,067
Other cash and due from banks (Note 9)	Margin calls – derivative financial instruments		17,705,021	-
Other cash and due from banks (Note 9)	Contingent guarantee of the deposits guarantee fund (FGD)		122,256,193,104	-
		¢	946,812,944,721	780,540,756,723
Investments in financial instruments:				
External debt bonds	Nomura Bank guarantee	¢	68,236,937,961	59,031,544,229
External debt bonds	SINPE guarantee		215,666,380,475	9,178,308,496
External debt bonds	JP-SWAPS guarantee		-	1,240,773,951
Term Certificate of Deposit	Nomura Bank guarantee		25,810,000,000	24,692,000,000
			309,713,318,436	94,142,626,676
Other assets:				
Other assets (Note 17)	Security deposits	¢	1,006,019,740	680,270,393

(Continued)

(8) Balances and transactions with related parties

As of December 31, balances and transactions with related parties are as follows:

		2021	2020
Assets:			
Checking accounts in foreign financial entities *(1)* (Note 9)	¢	21,945,597,789	18,728,211,563
Loan operations with related parties		-	6,280,116,731
Allowance for loan operations with related parties		-	(53,424,964)
Investments in financial instruments and accrued interest receivable		32,238,842,735	5,659,613,043
Accounts receivable *(2)* (Note 13)		14,072,965	400,005,800
Investments in other companies *(3)* (Note 15)	¢	124,445,020,038	117,685,238,496
		178,643,533,527	148,699,760,669
Liabilities:			
Demand obligations with entities *(4)* (Note 20)		317,433,795	1,653,297,863
Term obligations with entities *(5)* (Note 20)		270,812,000	22,212,000
Charges payable for obligations with related parties		1,741,064	1,253,627
	¢	589,986,859	1,676,763,490
Income:			
Operating income *(6)*		1,208,481,009	856,496,731
Gain on investments in other foreign companies		1,167,991,445	866,529,479
Gain on investments in entities supervised by SUGEVAL		6,022,365,412	5,286,023,289
Gain on investments in entities supervised by SUPEN		1,830,476,046	1,335,721,626
Gain on investments in entities supervised by SUGESE		3,614,043,094	3,537,069,285
	¢	13,843,357,006	11,881,840,410
Expenses:			
Finance costs *(7)*		15,038,252	19,992,595
Operating expenses *(8)*		891,609,877	663,713,575
	¢	906,648,129	683,706,170

(Continued)

The aforementioned balances and transactions with related parties correspond to:

(1) Balances in foreign checking accounts with Banco Internacional de Costa Rica, S.A., which bear interest at 2.25% per annum for both years

(2) Accounts receivable from transactions with subsidiaries for services rendered.

(3) Ownership interests and share investments in which the Bank has control or significant influence.

(4) Subsidiaries' checking accounts with the Bank.

(5) Subsidiaries' term certificate of deposit with the Bank.

(6) Commissions on the placement of investment funds, lease of physical space and services provided by Banco Nacional to the subsidiaries.

(7) Commissions on the placement of funds and issue of term certificates of deposit.

(8) Services provided by the procedures and self-issue insurance policy unit (*unidad de trámites y auto expedibles*) and lease of the Bank's custody system.

a) *Compensation to key management personnel*

For the year ended December 31, compensation to key management personnel is as follows:

		2021	2020
Short-term benefits	¢	1,065,243,298	982,137,501
Long-term benefits		138,481,629	127,677,875
Per diem – Board of directors		140,546,858	138,335,216
	¢	1,344,271,785	1,248,150,592

(9) Cash and cash equivalents

As of December 31, for purposes of reconciliation with the separate statement of cash flows, cash and cash equivalents are as follows:

		2021	2020
Cash and due from banks	¢	1,352,823,921,973	1,379,990,856,795
Investments with maturities of less than three months		248,507,769,187	93,456,261,887
	¢	1,601,331,691,160	1,473,447,118,682

As of December 31, cash and due from banks is as follows:

		2021	2020
Cash on hand and in vaults	¢	94,759,018,482	71,801,418,873
Cash in transit		58,255,934,323	27,571,913,455
Checking accounts in BCCR *(1)*		64,152,376,518	34,094,436,177
Minimum legal deposits in BCCR *(2)*		683,020,535,782	786,744,119,464
Checking accounts and demand deposits in State-owned commercial Banks and banks created under special laws		278,604,430	163,009,394
Checking accounts in foreign financial entities		300,162,110,106	431,725,189,207
Checking accounts and demand deposits with related parties (Note 8)		21,945,597,789	18,728,211,563
Overnight deposits in foreign financial entities		878,432,794	1,739,101,030
Transfers through the Interbank Electronic Payment System (SINPE)		1,360,638,705	2,067,809,169
Local notes receivable		4,373,095,594	3,502,281,731
Foreign notes receivable		1,363,679,325	710,531,665
Margin calls – derivative financial instruments (Note 7)		17,705,021	-
Other restricted cash and due from banks *(3)*		-	1,142,835,067
Contingent guarantee of the deposits guarantee fund (Fondo de Garantía de Depósitos, FGD)		122,256,193,104	-
	¢	1,352,823,921,973	1,379,990,856,795

(1) Checking accounts and demand deposits in BCCR include the balances of the minimum legal deposits required for 2021 and 2020 (see Note 7).

(Continued)

(2) As of June 16, 2019, as per Note GD-5879/09, the percentage for the minimum legal deposit is 12% and 15% in colones and US dollars, respectively. The amount of that legal deposit must be deposited in cash in BCCR in conformity with the current banking legislation. The legal deposit is calculated as a percentage of third-party deposits, which varies based on the term and form of deposit-taking used by the Bank. Additionally, the board of directors of BCCR, in number 6 of Article 5 of Minutes of Meeting No. 5923-2020, held on March 20, 2020, specifies that, during the legal deposit control period, the end-of-day balance of deposits in BCCR must not be less than 90% of the minimum legal deposit required in the second half of the previous month.

(3) Other restricted cash and due from Banks include the Commission Agreement for the custody of liabilities, checking accounts, savings accounts and term certificates of deposit of Banco Crédito Agrícola de Cartago (see Note 7).

(10) Investments in financial instruments

As of December 31, investments in financial instruments are as follows:

		2021	2020
Investments at fair value through profit or loss	¢	33,238,828,201	18,172,405,610
Investments at fair value through other comprehensive income		751,540,811,170	694,570,329,421
Investments at amortized cost		913,789,586,706	571,735,269,007
	¢	1,698,569,226,077	1,284,478,004,038
Interest rate futures – Hedges		7,723,704,438	15,753,371,710
Allowance for impairment of investments		(2,591,484,174)	(2,346,228,146)
Allowance for impairment of derivative instruments other than hedges		-	(58,699)
Accrued interest receivable on investments		18,845,785,134	18,334,204,657
	¢	1,722,547,231,475	1,316,219,293,560

(Continued)

a) *Investments at fair value through profit or loss*

As of December 31, investments at fair value through profit or loss are as follows:

		2021	2020
Local issuers			
Private banks		33,238,828,201	-
Private issuers	¢	-	18,172,405,610
	¢	33,238,828,201	18,172,405,610

b) *Investments at fair value through other comprehensive income*

As of December 31, investments at fair value through other comprehensive income are as follows:

		2021	2020
Local issuers			
Government of Costa Rica	¢	469,229,925,589	369,868,437,419
BCCR		36,285,369,340	16,407,184,721
State-owned banks		3,892,580,138	5,648,062,549
Private banks		645,545,744	-
	¢	510,053,420,811	391,923,684,689
Foreign issuers			
Governments	¢	53,201,249,677	78,890,923,800
Private issuers		82,109,124,968	114,795,596,000
Private banks		106,177,015,714	108,960,124,933
		241,487,390,359	302,646,644,793
	¢	751,540,811,170	694,570,329,421

(Continued)

c) *Investments at amortized cost*

As of December 31, investments at amortized cost are as follows:

		2021	2020
Local issuers			
Government of Costa Rica	¢	261,424,353,274	256,575,723,320
BCCR		284,729,758,820	81,767,031,269
Private banks		5,807,250,000	-
	¢	551,961,362,094	338,342,754,589
Foreign issuers			
Governments	¢	320,363,678,455	184,947,453,738
Private issuers		6,264,129,648	43,576,404,213
Private banks		35,200,416,508	4,868,656,467
		361,828,224,612	233,392,514,418
	¢	913,789,586,706	571,735,269,007

As of December 31, 2021, the valuation of investments in financial instruments and restricted financial instruments gave rise to unrealized gains, net of deferred tax, in the amount of ¢524,496,123 (December 2020: unrealized gains in the amount of ¢2,061,632,488). The cumulative balance of equity adjustments arising from the valuation of those investments is equivalent to unrealized gains of ¢11,061,423,302 (December 2020: unrealized gains in the amount of ¢10,536,927,179).

(11) Derivative financial instruments

The Bank holds the following types of derivative financial instruments:

✓ *Derivatives as risk hedging instruments*

The Bank obtained interest rate hedges to hedge exposure to the LIBOR rate on the international debt issue made in October 2013 in US dollars at a fixed rate. The purpose of these financial instruments is to offset the changes in fair value attributable to fluctuations in such reference rate.

As of December 31, derivative financial instruments are as follows:

		2021			
Issuing bank		Notional amount		Valuation	Purpose
CitiBank	US$	100,000,000	US$	3,739,241	Swaps to hedge 10-year issues (maturing in 2023)
JP Morgan		46,533,000		1,739,981	
Bank of America		173,588,000		6,490,874	
	US$	320,121,000	US$	11,970,096	
Amount in colones	¢	206,558,075,250	¢	7,723,704,438	
Chicago Board of Trade	US$	15,300,000	US$	(21,984)	Standardized futures contracts (maturing in 2022)
Amount in colones	¢	9,872,325,000	¢	(14,185,176)	

Issuing bank		2020 Notional amount		Valuation	Purpose
CitiBank	US$	100,000,000	US$	7,396,127	Swaps to hedge 10-year issues (maturing in 2023)
JP Morgan		46,533,000		3,441,640	
Bank of America		173,588,000		12,838,790	
	US$	320,121,000	US$	23,676,557	
Amount in colones	¢	197,610,693,300	¢	14,615,538,723	
Bank of America	US$	60,200,000	US$	352,970	Swaps to hedge 5-year issues (maturing in 2021)
JP Morgan		250,000,000		1,457,517	
	US$	310,200,000	US$	1,810,487	
Amount in colones	¢	191,486,460,000	¢	1,117,613,736	
Chicago Board of Trade	US$	12,200,000	US$	11,171	Standardized futures contracts (maturing in 2021)
Amount in colones	¢	7,531,060,000	¢	6,896,000	

As of December 31, 2021, total notional amounts of US$335,421,000, equivalent to ¢216,430,400,250 (2020: US$642,521,000, equivalent to ¢396,628,213,300) are booked under "Other debit memoranda accounts" (see Note 29).

Gains and losses on the valuation of derivative financial instruments are booked under asset and liability accounts, respectively.

As of December 31, 2021, the Bank booked an increase in the fair value of these swaps in the amount of US$11,970,096, equivalent to ¢7,723,704,438 (2020: increase in fair value of US$25,487,044, equivalent to ¢15,733,152,459) (see Note 10).

For purposes of the valuation the aforementioned interest rate swaps, the Bank elected to apply the "Fair Value Hedge Method"; while the "Dollar Offset Method" is used to test hedge effectiveness. The latter method was defined 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 December 31, the effectiveness of the valuation of derivative financial instruments is as follows:

	Rate of effectiveness	
	2021	2020
10-year issue (maturing in 2023)	109.11%	94.58%
5-year issue (maturing 2021)	-	101.40%

A valuation was performed to calculate the change in the fair value of the primary and derivative instruments based on the following inputs:

- a 10-year LIBOR rate at the issue of the bond
- discount rates from Bloomberg
- zero rates corresponding to the swap curve as of December 31, 2021 and 2020
- only a portion of the bond cash flows is hedged (corresponding to the 5-year and 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.

As of December 31, 2021, standardized futures contracts were negotiated as part of the management of the financial derivatives portfolio. The Bank booked a notional amount of US$15,300,000, equivalent to ¢9,872,325,000 (2020: US$12,200,000, equivalent to ¢7,531,060,000) for the sale and purchase of these futures contracts.

As of December 31, 2021, the Bank booked a decrease in the fair value of futures contracts in the amount of US$21,984 equivalent to ¢14,185,350 (2020: increase in fair value of US$11,171 equivalent to ¢6,896,000).

✓ *Derivatives other than hedges*

Currency forwards:

The Bank entered into currency forwards 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.

These types of instruments are products which the Bank can offer to its clients pursuant to the authorization provided by BCCR to operate exchange rate derivatives.

As of December 31, 2021, the Bank has no currency forwards (2020: currency forwards with a total notional amount of US$2,300,000, equivalent to ¢1,417,790,000).

As of December 31, 2020, the Bank booked an increase in the fair value of these forwards in the amount of ¢13,323,251 under an asset account. It did not book a decrease in the fair value of these forwards, which would have been booked under a liability account.

For 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 US dollars applicable to different terms.

As of December 31, the effect of derivative financial instruments on profit or loss is as follows:

		2021	2020
Gains on derivative financial instruments	¢	7,266,821,001	21,875,260,965
Losses on derivative financial instruments		(9,275,414,200)	(6,149,525,767)
Net (losses) gains	¢	(2,008,593,199)	15,725,735,198

(12) Loan portfolio

(a) *Loan portfolio by sector*

As of December 31, the loan portfolio by sector is as follows:

		2021	2020
Trade	¢	330,171,594,062	366,543,473,364
Services *(1)*		1,043,436,571,257	882,958,009,616
Financial services *(1)*		91,266,302,711	86,384,902,878
Mining		455,324,660	723,836,045
Manufacturing and quarrying		158,415,565,843	154,439,840,021
Construction		93,491,037,959	97,117,113,215
Agriculture and forestry		116,562,814,807	119,176,139,304
Livestock, hunting and fishing		72,831,830,903	73,609,723,660
Electricity, water, sanitation and other related sectors		465,323,785,148	483,518,311,261
Transportation and telecommunications		43,598,161,061	46,878,351,392
Housing		1,347,158,225,840	1,317,083,078,572
Personal or consumer loans		503,511,429,681	528,808,645,806
Tourism		268,107,946,733	201,470,968,486
Total direct loans		4,534,330,590,665	4,358,712,393,620
Incremental direct costs related to loans		3,675,079,715	3,756,519,754
(Deferred income from loan portfolio)		(35,117,407,652)	(33,106,164,873)
Accrued interest receivable		110,377,468,668	122,742,551,278
Allowance for loan losses		(135,831,283,295)	(155,527,961,609)
Loan portfolio	¢	4,477,434,448,101	4,296,577,338,170

(1) As of December 31, 2021, the Bank purchased a loan portfolio in the amount of ¢132,082,320,757, distributed among the services and financial services sectors.

As of December 31, annual interest rates on loans receivable are as follows:

	2021		2020	
Currency	Rates	Average *(1)*	Rates	Average *(1)*
Colones	0.55% to 45.00%	12.09%	2.00% to 45.00%	13.32%
US dollars	0.35% to 29.00%	7.55%	0.24% to 31.00%	7.47%
DU	3.85% to 10.00%	5.86%	3.85% to 10.00%	5.67%

(1) Simple average of the minimum and maximum values of the portfolio as of December 31, 2021 and 2020.

(b) *Loan portfolio by arrears*

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

		2021	2020
Current	¢	4,282,530,208,271	4,117,866,391,612
1 to 30 days		53,971,542,316	39,216,725,680
31 to 60 days		53,341,812,649	30,186,427,162
61 to 90 days		20,491,714,014	12,005,404,085
91 to 120 days		10,017,004,923	12,340,866,689
121 to 180 days		11,376,887,610	19,995,685,880
More than 180 days		102,601,420,882	127,100,892,512
		4,534,330,590,665	4,358,712,393,620
Incremental direct costs related to loans		3,675,079,715	3,756,519,754
(Deferred income from loan portfolio)		(35,117,407,652)	(33,106,164,873)
Accrued interest receivable		110,377,468,668	122,742,551,278
Allowance for loan losses		(135,831,283,295)	(155,527,961,609)
	¢	4,477,434,448,101	4,296,577,338,170

(c) *Allowance for loan losses*

For the year ended December 31, movement in the allowance for loan losses is as follows:

		2021	2020
Opening balance	¢	155,527,961,609	118,507,110,835
Allowance expense for the year (Note 36)		78,587,703,720	68,378,115,627
Write-offs		(100,201,837,988)	(34,781,370,191)
Adjustments due to reclassification of allowance		-	147,982,736
Foreign exchange differences		1,917,455,954	3,276,122,60
Closing balance	¢	135,831,283,295	155,527,961,609

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

(d) *Allowance for impairment of stand-by credits*

As of December 31, movement the allowance for stand-by credits is as follows:

		2021	2020
Opening balance	¢	717,444,504	147,982,736
Allowance expense for the year (Note 36)		120,000,001	545,025,566
Foreign exchange differences		24,724,631	24,436,202
Closing balance	¢	862,169,136	717,444,504

(13) Accounts and fees and commissions receivable

As of December 31, accounts and fees and commissions receivable are as follows:

		2021	2020
Fees and commissions	¢	552,182,422	293,377,460
Accounts due from related parties (Note 8)		14,072,965	400,005,800
Accounts due from employees		15,322,923	19,025,296
Income tax receivable		141,325,587	143,613,342
Sundry accounts receivable related to credit cards		339,109,267	237,913,865
Other expenses receivable		23,082,305	22,525,395
Credit fraud		742,752,108	748,936,955
Misappropriation and theft		1,523,981,966	1,639,896,256
Theft of information		-	200,323,088
Input, maintenance or upload errors		-	185,347,393
Other accounts receivable		1,400,454,017	1,181,631,491
Accrued interest receivable on other sundry accounts receivable		1,923,294	2,991,594
Allowance for impairment of accounts receivable		(4,006,933,384)	(4,151,289,351)
	¢	747,273,470	924,298,584

(Continued)

For the year ended December 31, movement in the allowance for impairment of other accounts receivable is as follows:

		2021	2020
Opening balance	¢	4,151,289,351	4,380,482,609
Allowance expense (Note 36)		879,441,297	1,080,131,153
Decrease in allowance (Note 37)		(521,599,531)	(752,680,302)
Write-offs		(516,463,912)	(574,231,463)
Foreign exchange differences		14,266,179	17,587,354
Closing balance	¢	4,006,933,384	4,151,289,351

(14) Foreclosed assets

As of December 31, foreclosed assets are presented net of the allowance for impairment and per legal requirements, as follows:

		2021	2020
Assets acquired in lieu of payment	¢	94,628,393,958	98,844,527,473
Idle property, furniture and equipment		55,884,629	55,884,629
Allowance for impairment of foreclosed assets and per legal requirements		(58,895,478,390)	(66,534,513,087)
	¢	35,788,800,197	32,365,899,015

For the year ended December 31, movement in the allowance for impairment of foreclosed assets and per legal requirements is as follows:

		2021	2020
Opening balance	¢	66,534,513,087	63,718,411,084
Allowance expense (Note 36)		1,732,758,628	9,628,924,296
Decrease in allowance		(9,371,793,325)	(6,812,822,293)
Closing balance	¢	58,895,478,390	66,534,513,087

(Continued)

(15) Investments in other companies

As of December 31, investments in other companies are as follows:

		2021	2020
BN Valores Puesto de Bolsa, S.A.	¢	17,148,225,676	18,628,899,383
BN Sociedad Administradora de Fondos de Inversión, S.A.		11,524,835,151	9,792,805,863
BN Vital Operadora de Planes de Pensiones Complementarias, S.A.		12,993,214,680	9,710,979,848
BN Corredora de Seguros, S.A.		6,016,601,765	7,176,131,791
Investment in other non-financial entities *(1)*		20,623,300	20,623,300
Banco Internacional de Costa Rica, S.A. *(2)*		76,762,142,766	72,376,421,611
	¢	124,465,643,338	117,705,861,796

(1) As of December 31, the Bank's investments in other non-financial entities are as follows:

		2021	2020	Description
Interclear Central de Valores, S.A.	¢	15,000,000	15,000,000	To operate in the electronic custody of securities
Depósito Libre Comercial Golfito (Golfito Duty Free Shopping Center) per article 24 of Law No. 7131		5,200,000	5,200,000	Golfito Duty Free Shopping Center
Other financial entities (cooperatives)		423,300	423,300	Investments in various cooperatives
	¢	20,623,300	20,623,300	

(1) The Bank holds 49% ownership interest in BICSA, represented in 2021 and 2020 by 6,506,563 ordinary shares with a par value of US$10.

(Continued)

BANCO NACIONAL DE COSTA RICA

Notes to the Separate Financial Statements

(16) Property, furniture and equipment, and right-of-use assets, net

a) Historical cost and depreciation

As of December 31, property, furniture and equipment is as follows:

		2021					
		Land	Buildings	Furniture and equipment	Computer hardware	Vehicles	Total
Cost:							
Historical cost at beginning of year	¢	4,281,149,677	70,673,112,451	65,123,960,462	48,722,065,974	327,033,755	189,127,322,319
Revalued cost at beginning of year		49,374,508,221	65,580,690,062	-	-	-	114,955,198,283
Additions		-	1,765,734,027	8,806,084,195	2,754,761,630	64,027,113	13,390,606,965
Disposals		-	-	(1,757,526,434)	(2,241,965,875)	-	(3,999,492,309)
Sales		-	-	-	(193,561,935)	-	(193,561,935)
Reclassifications		-	-	2,838,526	(2,838,526)	-	-
Closing balance		53,655,657,898	138,019,536,540	72,175,356,749	49,038,461,268	391,060,868	313,280,073,323
Accumulated depreciation:							
Opening balance		-	48,747,685,316	39,251,743,249	37,391,403,037	243,346,267	125,634,177,869
Depreciation expense on historical cost		-	1,614,246,416	6,784,068,243	4,273,186,472	17,261,557	12,688,762,688
Depreciation expense on revalued cost		-	889,309,530	-	-	-	889,309,530
Disposals		-	-	(1,693,080,970)	(2,240,274,744)	-	(3,933,355,714)
Sales		-	-	-	(36,429,793)	-	(36,429,793)
Reclassifications		-	-	1,863,016	(1,863,016)	-	-
Closing balance		-	51,251,241,262	44,344,593,538	39,386,021,956	260,607,824	135,242,464,580
Net closing balance	¢	53,655,657,898	86,768,295,278	27,830,763,211	9,652,439,312	130,453,044	178,037,608,743

		2020					
		Land	Buildings	Furniture and equipment	Computer hardware	Vehicles	Total
Cost:							
Historical cost at beginning of year	¢	4,281,149,677	70,302,884,014	63,338,897,991	48,924,456,629	334,046,918	187,181,435,229
Revalued cost at beginning of year		49,385,684,604	65,580,690,062	-	-	-	114,966,374,666
Additions		-	413,600,223	8,555,814,268	4,688,301,045	-	13,657,715,536
Asset revaluation		(11,176,383)	-	-	-	-	(11,176,383)
Disposals		-	-	(6,623,074,182)	(4,930,879,149)	(1,370,000)	(11,555,323,331)
Adjustments		-	(43,371,785)	(105,964,747)	(7,168,582)	-	(156,505,114)
Reclassifications		-	-	(41,712,868)	47,356,031	(5,643,163)	-
Closing balance		53,655,657,898	136,253,802,514	65,123,960,462	48,722,065,974	327,033,755	304,082,520,603
Accumulated depreciation:							
Opening balance		-	46,650,108,387	38,949,032,409	37,199,532,960	221,145,936	123,019,819,692
Depreciation expense on historical cost		-	1,604,652,444	6,347,585,476	5,025,985,817	23,618,259	13,001,841,996
Depreciation expense on revalued cost		-	965,406,447	-	-	-	965,406,447
Disposals		-	-	(5,969,048,992)	(4,830,870,437)	(1,370,000)	(10,801,289,429)
Adjustments		-	(472,481,962)	(71,950,289)	(7,168,586)	-	(551,600,837)
Reclassifications		-	-	(3,875,355)	3,923,283	(47,928)	-
Closing balance		-	48,747,685,316	39,251,743,249	37,391,403,037	243,346,267	125,634,177,869
Net closing balance	¢	53,655,657,898	87,506,117,198	25,872,217,213	11,330,662,937	83,687,488	178,448,342,734

(Continued)

As of the December 31, 2021 close, the appraisals of the Bank's land and buildings were performed by an independent appraiser. The net realizable value obtained was compared to the carrying amount to determine the equity increase and the effects on the accumulated depreciation and revaluation accounts. Based on the valuation techniques used, those items are classified as Level 3 of the fair value hierarchy.

b) *Right-of-use assets*

As of December 31, the right of use comprises the lease of buildings and vehicles as follows:

	2021		
	Right of use of building	Right of use of vehicles	Total
Cost:			
Historical cost at beginning of year	¢ 38,798,392,047	277,254,296	39,075,646,343
Additions	159,720,303	-	159,720,303
Disposals	(493,127,291)	(160,028,888)	(653,156,179)
Adjustments	(557,427,999)	(9,595,226)	(567,023,225)
Closing balance	37,907,557,060	107,630,182	38,015,187,242
Accumulated depreciation:			
Opening balance	5,529,282,083	192,006,037	5,721,288,120
Depreciation expense on historical cost	2,782,828,327	58,198,550	2,841,026,877
Disposals	(64,584,975)	(160,028,892)	(224,613,867)
Adjustments	(951,404)	(2,114,597)	(3,066,001)
Closing balance	8,246,574,031	88,061,098	8,334,635,129
Net closing balance	¢ 29,660,983,029	19,569,084	29,680,552,113

		2020		
		Right of use of building	Right of use of vehicles	Total
Cost:				
Effects of implementation of IFRS	¢	41,412,968,647	277,254,296	41,690,222,943
Additions		11,305,430	-	11,305,430
Disposals		(3,285,365,707)	-	(3,285,365,707)
Adjustments		659,483,677	-	659,483,677
Closing balance		38,798,392,047	277,254,296	39,075,646,343
Accumulated depreciation:				
Effects of implementation of IFRS		3,046,732,987	97,203,330	3,143,936,317
Depreciation expense on historical cost		2,979,840,467	94,802,707	3,074,643,174
Disposals		(527,027,745)	-	(527,027,745)
Adjustments		29,736,374	-	29,736,374
Closing balance		5,529,282,083	192,006,037	5,721,288,120
Net closing balance	¢	33,269,109,964	85,248,259	33,354,358,223

c) *Lease liabilities*

i. *Amounts recognized in profit or loss*

As of December 31, the amounts recognized in profit or loss are as follows:

		2021	2020
Interest on lease liability	¢	3,388,492,799	3,623,877,063
Expenses for leases of low-value assets, excluding short-term assets	¢	518,165,945	874,620

ii. *Amounts recognized in the statement of cash flows*

As of December 31, the amounts recognized the statement of cash flows are as follows:

		2021	2020
Total cash outflows for leases	¢	1,875,696,458	1,811,972,981

(17) Other assets

As of December 31, other assets are as follows:

		2021	2020
Deferred charges:			
Leasehold improvements *(1)*	¢	9,757,225	87,401,446
Cost of issue of financial instruments, net *(2)*		233,534,135	383,327,082
Cost of subordinated debt project		97,783,459	215,689,311
Other deferred charges		28,387,122,273	42,613,181,701
		28,728,197,092	43,299,599,540
Intangible assets:			
Software *(3)*		8,680,579,540	4,704,324,311
		8,680,579,540	4,704,324,311
Other assets:			
Prepaid taxes		5,392,160,905	1,436,590,238
Prepaid insurance policy		158,891,275	130,086,559
Other prepaid expenses		4,689,541,410	7,763,078,746
Stationery, office supplies and other materials		696,446,009	905,436,472
Leased assets		120,107,359	121,506,085
Library and artwork		400,081,892	400,081,892
Construction work-in-progress		1,380,986,124	1,383,200,612
Payments to welfare and trade associations		350,000	350,000
Other sundry assets		158,557,669	158,557,669
Operations pending settlement		6,036,577,570	21,965,902,330
Other operations pending application		80,847,419	118,059,154
Security deposits (Note 7)		805,289,507	439,920,909
Legal and administrative deposits (Note 7)		200,730,232	240,349,485
		20,120,567,371	35,063,120,151
	¢	57,529,344,003	83,067,044,002

(1) As of December 31, 2021, the amortization expense for leasehold improvements amounts to ¢77,644,222 (2020: ¢225,127,519).

(2) As of December 31, costs related to the issue of financial instruments are as follows:

		2021			
		5-year issue (maturing in 2018)	10-year issue (maturing in 2023)	5-year issue (maturing in 2021)	Total
Commission - structuring banks	¢	322,625,000	322,625,000	548,462,500	1,193,712,500
Commission - Moody's Investors Service		161,312,500	161,312,500	-	322,625,000
Commission - Société de la Bourse de Luxembourg, S.A.		7,885,600	7,885,600	-	15,771,200
RR Donelley		7,063,552	7,063,526	4,228,501	18,355,579
BNY Mellon		2,550,673	2,550,673	3,721,157	8,822,503
Moody's - issuer rating		21,357,775	21,357,775	161,312,500	204,028,050
Fitch Ratings		161,312,500	161,312,500	161,312,500	483,937,500
Milbank		94,954,990	94,954,990	127,127,549	317,037,529
Shearman & Sterling		95,078,233	95,078,233	141,434,993	331,591,459
External audit		122,597,500	122,597,500	149,698,000	394,893,000
Perkins Cole (Broker)		-	-	8,463,777	8,463,777
Printing of documents		-	-	10,204,607	10,204,607
		996,738,323	996,738,297	1,315,966,084	3,309,442,704
Amortization		(996,738,323)	(763,204,162)	(1,315,966,084)	(3,075,908,569)
	¢	-	233,534,135	-	233,534,135

		2020			
		5-year issue (maturing in 2018)	10-year issue (maturing in 2023)	5-year issue (maturing in 2021)	Total
Commission - structuring banks	¢	308,650,000	308,650,000	524,705,000	1,142,005,000
Commission - Moody's Investors Service		154,325,000	154,325,000	-	308,650,000
Commission - Société de la Bourse de Luxembourg, S.A.		7,544,023	7,544,023	-	15,088,046
RR Donelley		6,757,583	6,757,558	4,045,337	17,560,478
BNY Mellon		2,440,187	2,440,187	3,559,969	8,440,343
Moody's - issuer rating		20,432,630	20,432,630	154,325,000	195,190,260
Fitch Ratings		154,325,000	154,325,000	154,325,000	462,975,000
Milbank		90,841,868	90,841,868	121,620,823	303,304,559
Shearman & Sterling		90,959,773	90,959,771	135,308,518	317,228,063
External audit		117,287,000	117,287,000	143,213,600	377,787,600
Perkins Cole (Broker)		-	-	8,097,155	8,097,155
Printing of documents		-	-	9,762,503	9,762,503
		953,563,064	953,563,037	1,258,962,905	3,166,089,006
Amortization		(953,563,064)	(619,064,422)	(1,210,134,438)	(2,782,761,924)
	¢	-	334,498,615	48,828,467	383,327,082

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

(Continued)

(3) As of December 31, intangible assets, net, are as follows:

		2021	
	Software	Other intangible assets	Total
Cost:			
Opening balance	¢ 32,942,596,150	42,095,559	32,984,691,709
Additions	8,335,812,378	-	8,335,812,378
Disposals	(7,070,622,743)	-	(7,070,622,743)
Adjustments	(116,483,281)	-	(116,483,281)
Closing balance	34,091,302,504	42,095,559	34,133,398,063
Accumulated amortization:			
Opening balance	28,238,271,839	42,095,559	28,280,367,398
Expense for the year	4,243,757,216	-	4,243,757,216
Disposals	(7,070,622,743)	-	(7,070,622,743)
Adjustments	(683,348)	-	(683,348)
Closing balance	25,410,722,964	42,095,559	25,452,818,523
Net closing balance	¢ 8,680,579,540	-	8,680,579,540

		2020	
	Software	Other intangible assets	Total
Cost:			
Opening balance	¢ 31,645,235,633	42,095,559	31,687,331,192
Additions	2,277,745,796	-	2,277,745,796
Disposals	(853,968,232)	-	(853,968,232)
Adjustments	(126,417,047)	-	(126,417,047)
Closing balance	32,942,596,150	42,095,559	32,984,691,709
Accumulated amortization:			
Opening balance	25,245,057,946	42,095,559	25,287,153,505
Expense for the year	3,911,407,174	-	3,911,407,174
Disposals	(853,968,232)	-	(853,968,232)
Adjustments	(64,225,049)	-	(64,225,049)
Closing balance	28,238,271,839	42,095,559	28,280,367,398
Net closing balance	¢ 4,704,324,311	-	4,704,324,311

(Continued)

(18) Obligations with the public

As of December 31, obligations with the public by cumulative amount are as follows:

	2021	2020
Demand deposits:		
Checking accounts	¢ 2,280,685,115,875	1,722,635,196,234
Certified checks	81,126,362	158,566,763
Savings deposits	2,049,250,666,697	1,793,268,825,369
Matured term deposits	23,072,595,759	21,038,851,425
Other demand deposits	122,843,952	126,026,584
Drafts and transfers payable	194,665,191	402,866,378
Cashier's checks	4,616,672,412	2,853,421,177
Advance collections from customers for credit cards	11,196,281,538	11,366,072,439
Banking mandates	-	1,142,835,067
Trust fund obligations	38,184,399	70,824,810
	4,369,258,152,185	3,553,063,486,246
Term deposits:		
Deposits from the public	1,635,557,973,096	1,938,769,672,856
Other term deposits	65,562,075,052	97,766,851,400
	1,701,120,048,148	2,036,536,524,256
Finance charges payable	27,369,847,440	36,584,506,787
	¢ 6,097,748,047,773	5,626,184,517,289

As of December 31, 2021, deposits in checking accounts in colones bear interest at a maximum rate of 1.15% per annum on full balances and at a minimum rate of 0.00% per annum on balances greater than or equal to ¢500,001 (2020: 1.15% and 0.65%). Deposits in checking accounts in US dollars bear interest at a maximum rate of 0.20% per annum on full balances and at a minimum rate of 0.00% per annum on balances greater than or equal to US$1,000 (2020: 0.25% and 0.10%).

Term deposits correspond to term certificates of deposit in colones, US dollars, and euro. As of December 31, term certificates bear annual interest at the following rates:

Currency	2021	2020
Colones	0.77% to 5.95%	1.25% to 6.75%
US dollars	0.10% to 3.80%	0.20% to 3.90%

(Continued)

The Bank has term certificates of deposit that are restricted to secure certain loan operations. As of December 31, 2021, the balance of those term certificates of deposit is ¢80,694,825,700 (2020: ¢80,013,679,833). As of that date, the Bank has no inactive deposits with State-owned entities or other banks.

(19) Obligations with BCCR

As of December 31, obligations with BCCR are as follows:

		2021	2020
Financing of loans using internal funds *(i)*		167,166,427,708	8,000,000,000
Financing of loans using external funds *(ii)*	¢	125,644,412	125,644,412
Finance charges payable		951,173,419	666,667
	¢	168,243,245,539	8,126,311,079

i. Corresponds to the partial redemption of deferred term obligations (ODP).

ii. According to Agreement MAG/AID 515-T-027 signed December 15, 1981, obligations related to financing of loans using external funds correspond to the agreement between the Government of Costa Rica and the Bank regarding management of the funds of the Agricultural Production Systems Project. This loan bears no interest and the agreement shall remain effective until otherwise agreed.

(Continued)

(20) Obligations with financial entities

As of December 31, obligations with financial entities are as follows:

	2021	2020
Demand:		
Checking accounts with local financial entities	¢ 112,128,062,548	63,081,831,168
Savings deposits with local financial entities	46,270,767	52,978,622
Outstanding checks	1,278,976,636	1,319,135,518
Matured term deposits	2,830,075	4,150,001
Checking accounts and obligations with related parties (Note 8)	317,433,795	1,653,297,863
	113,773,573,821	66,111,393,172
Term:		
Term deposits with local financial entities	82,937,788,340	81,249,784,724
Term obligations with foreign financial entities *(2)*	212,580,207,605	400,679,619,801
Loans from local financial entities *(3)*	34,352,702,356	30,060,611,046
Loans from foreign financial entities *(3)(4)*	119,806,406,600	114,374,846,095
Lease liabilities *(1)*	35,041,666,758	36,527,027,410
Obligations with related financial entities (Note 8)	270,812,000	22,212,000
Obligations with funds from the Development Credit Fund	186,762,911,685	167,991,227,096
	671,752,495,344	830,905,328,172
(Deferred fees and commissions on own loan portfolio)	(51,811,794)	(49,567,474)
	(51,811,794)	(49,567,474)
Charges payable for other demand and term obligations with financial entities – foreign currency	46,267,755	23,373,089
Charges payable for other demand and term obligations with financial entities – local currency	406,806,450	373,012,120
Charges payable for loans with foreign financial entities *(3)(4)*	517,859,705	534,786,904
Charges payable for loans with local financial entities *(3)*	42,198,364	63,322,482
Charges payable for term deposits with foreign financial entities *(2)*	2,151,646,656	4,120,913,505
	3,164,778,930	5,115,408,100
	¢ 788,639,036,301	902,082,561,970

(Continued)

(1) Lease liabilities

As of December 31, 2021, long-term lease liabilities and their current portion amount to ¢6,112,557,694 and US$44,833,954, for a total in colones of ¢35,041,666,758, using an exchange rate of ¢645.25 (December 2020: ¢6,852,361,433 and US$48,071,709, for a total in colones of ¢36,527,027,410, using an exchange rate of ¢617.30).

As of December 31, 2021, lease liabilities include 76 lease operations, of which 17 are denominated in colones, bearing interest at rates ranging between 5.56% and 15% per annum and maturing between 2022 and 2042. The remaining 59 lease operations are denominated in US dollars, bearing interest at rates ranging between 3.57% and 8.85% per annum and maturing between 2022 and 2041.

As of December 31, 2020, lease liabilities correspond to 75 lease operations, of which 15 operations are denominated in colones, bearing interest at rates ranging between 11.80% and 13.63% per annum and maturing between 2022 and 2042. The remaining 60 lease operations are denominated in US dollars, bearing interest at rates ranging between 8.80% and 8.85% per annum and maturing between 2022 and 2041.

As of December 31, future minimum lease payments are as follows:

		2021		
		Future minimum lease payments	Interest	Present value of minimum lease payments
Less than one year	¢	5,294,140,912	3,276,617,057	2,017,523,885
Between one and five years		24,551,213,056	13,368,930,934	11,182,282,122
More than five years		31,295,162,764	9,453,301,983	21,841,860,781
	¢	61,140,516,732	26,098,849,974	35,041,666,758

		2020		
		Future minimum lease payments	Interest	Present value of minimum lease payments
Less than one year	¢	5,295,814,630	3,285,966,632	2,009,847,998
Between one and five years		24,553,927,714	14,344,327,806	10,209,599,908
More than five years		36,156,589,332	11,849,009,827	24,307,579,504
	¢	66,006,331,676	29,479,304,265	36,527,027,410

As of December 31, the reconciliation of the lease liabilities with cash flows from financing activities is as follows:

		2021	2020
Balance at beginning of year	¢	36,527,027,410	38,483,041,275
New financial obligations		159,720,303	9,960,187
Settlements or withdrawals		(467,870,644)	(2,947,517,894)
Adjustments		(569,367,591)	660,828,920
Payment of obligations		(1,875,696,458)	(1,811,972,981)
Changes in cash flows from financing activities		33,773,813,020	34,394,339,507
Foreign exchange differences		1,267,853,738	2,132,687,903
Balance at end of year	¢	35,041,666,758	36,527,027,410

(2) Obligations with foreign financial entities are as follows:

Date of issue	Face value	Characteristics
11/01/2013	US$500 million	• Traded amount: 99.072% • Term: 10 years • Interest rate: 6.250% per coupon payment
04/25/2016	US$500 million	• Traded amount: 99.68% • Term: 5 years • Interest rate: 5.875% per coupon payment

As of December 31, the balances of those issues according to the term of the obligations are as follows:

		2021	
		10-year issue (maturing in 2023)	Total
Issue	¢	204,641,216,312	204,641,216,312
Adjustment to fair value of hedged item measured at cost of international issues		6,491,805,120	6,491,805,120
Amortization of discount in traded amount of issues		1,447,186,174	1,447,186,174
		212,580,207,605	212,580,207,605
Finance charges payable		2,151,646,656	2,151,646,656
	¢	214,731,854,261	214,731,854,261

		2020		
		10-year issue (maturing in 2023)	5-year issue (maturing in 2021)	Total
Issue	¢	195,776,866,066	190,873,703,328	386,650,569,394
Adjustment to fair value of hedged item measured at cost of international issues		12,722,231,276	(413,491,874)	12,308,739,402
Amortization of discount in traded amount of issues		1,171,077,027	549,233,978	1,720,311,005
		209,670,174,369	191,009,445,432	400,679,619,801
Finance charges payable		2,058,444,759	2,062,468,746	4,120,913,505
	¢	211,728,619,128	193,071,914,178	404,800,533,306

(Continued)

(3) As of December 31, the maturity of loans, term obligations and charges due to financial entities is as follows:

		2021		
		Local	Foreign	Total
One to two years	¢	42,198,364,	71,930,516,305	71,972,714,669
Three to five years		2,815,619,439	-	2,815,619,439
More than five years		31,537,082,917	48,393,750,000	79,930,832,917
	¢	34,394,900,720	120,324,266,305	154,719,167,025

		2020		
		Local	Foreign	Total
Less than one year		63,322,482	21,690,172,319	21,753,494,801
Three to five years		-	46,297,500,000	46,297,500,000
More than five years		30,060,611,046	46,921,960,680	76,982,571,726
		30,123,933,528	114,909,632,999	145,033,566,527

(4) As of December 31, 2021, loans due to financial entities abroad bear interest at rates ranging from 2.84% to 6.65% per annum (2020: ranging from 2.60% to 6.65% per annum).

As of December 31, the reconciliation of notes payable with cash flows from financing activities, as required by IAS 7, is as follows:

		2021	2020
Balance at beginning of year	¢	144,435,457,141	135,780,260,555
New financial obligations		32,192,000,006	38,326,617,261
Settlement of financial obligations		(27,887,555,495)	(39,250,574,578)
Foreign exchange differences		5,419,207,304	9,579,153,903
Cash flows from financing activities		5,431,560,505	8,655,196,586
Balance at end of year	¢	154,159,108,956	144,435,457,141

(Continued)

(21) Income tax

Pursuant to the Costa Rican Income Tax Law, the Bank is required to file income tax returns each year. As of December 31, income tax is as follows:

a) *Income tax for the year*

For the year ended December 31, the income tax expense is as follows:

		2021	2020
Current tax:			
Income tax expense for the year	¢	13,597,037,026	11,894,096,264
Prior-period income tax expense		14,189,237,931	14,241,264,445
		27,786,274,957	26,135,360,709
Deferred tax:			
Deferred tax expense		1,564,351,524	1,525,024,144
Deferred tax income		(1,221,352,863)	(2,151,154,343)
Total deferred tax expense, net		342,998,661	(626,130,199)
Income tax expense, net	¢	28,129,273,618	25,509,230,510

For the year ended December 31, the difference between the income tax expense and the amount that would result from applying the corresponding tax rate to pre-tax income (30%) is reconciled as follows:

		2021		2020	
Income before income tax	¢	59,822,176,526		50,712,881,565	
Plus (less) tax effect of:					
Non-deductible expenses		23,231,315,038	51%	12,389,918,810	31%
Deductible expenses		(9,967,393,661)	22%	(9,831,209,610)	25%
Non-taxable income		(28,031,902,872)	62%	(13,624,603,217)	34%
Taxable income		269,261,722	1%	-	
Tax base		45,323,456,753		39,646,987,548	
Tax rate		30%		30%	
Income tax expense		13,597,037,026		11,894,096,265	
Prior-period income tax expense		14,189,237,931		14,241,264,445	
Deferred tax expense		1,564,351,524		1,525,024,144	
Deferred tax income		(1,221,352,863)		(2,151,154,343)	
Deferred tax expense, net	¢	28,129,273,618		25,509,230,510	

(Continued)

b) *Deferred tax*

As of December 31, deferred tax assets and liabilities are as follows:

		2021		
		Assets	Liabilities	Net
Unrealized losses on valuation of investments	¢	351,515,796	-	351,515,796
Right-of-use assets		1,608,334,393		1,608,334,393
Unrealized gains on valuation of investments		-	(3,429,452,240)	(3,429,452,240)
Revaluation of property		-	(8,836,563,018)	(8,836,563,018)
Tax base of property and equipment		-	(4,738,688,539)	(4,738,688,539)
	¢	1,959,850,189	(17,004,703,797)	(15,044,853,608)

		2020		
		Assets	Liabilities	Net
Unrealized losses on valuation of investments	¢	350,613,516	-	350,613,516
Right-of-use assets		951,800,756	-	951,800,756
Unrealized gains on valuation of investments		-	(2,521,703,758)	(2,521,703,758)
Revaluation of property		-	(9,036,119,130)	(9,036,119,130)
Tax base of property and equipment		-	(3,739,156,241)	(3,739,156,241)
	¢	1,302,414,272	(15,296,979,129)	(13,994,564,857)

As of December 31, deferred tax assets and liabilities are as follows:

		December 2020	Included in the income statement	Included in equity	December 2021
Unrealized losses on valuation of investments	¢	350,613,516	-	902,280	351,515,796
Right-of-use assets		951,800,756	-	656,533,637	1,608,334,393
Unrealized gains on valuation of investments		(2,521,703,758)	-	(907,748,483)	(3,429,452,241)
Revaluation of property		(9,036,119,130)	-	199,556,113	(8,836,563,017)
Tax base of property and equipment		(3,739,156,241)	(345,275,292)	(654,257,006)	(4,738,688,539)
	¢	(13,994,564,857)	(345,275,292)	7,789,184,381	(15,044,853,608)

		December 2019	Included in the income statement	Included in equity	December 2020
Unrealized losses on valuation of investments	¢	965,997,108	-	(615,383,592)	350,613,516
Right-of-use assets		-	971,405,490	(19,604,734)	951,800,756
Unrealized gains on valuation of investments		(3,797,288,086)	-	1,275,584,328	(2,521,703,758)
Revaluation of property		(9,506,392,778)	-	470,273,648	(9,036,119,130)
Tax base of property and equipment		-	(345,275,292)	(3,393,880,949)	(3,739,156,241)
	¢	(12,337,683,756)	(626,130,198)	(2,283,011,299)	(13,994,564,857)

(Continued)

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

As of December 31, 2021, the Bank has not recognized a deferred tax liability in the amount of ¢3,226,273,002 (2020: ¢4,651,425,169), given that it controls the moment when the subsidiaries pay dividends.

Tax returns filed by the Bank for the years ended December 31, 2020 and the tax return that will be filed for the year ended December 31, 2021 are open to review by the Tax Authorities.

(22) Provisions

As of December 31, provisions are as follows:

		2021	2020
Severance benefits	¢	330,973,577	284,090,167
Litigation		7,917,746,644	6,831,546,344
Inactive checking and savings accounts liquidated		777,866,680	759,171,321
Manager commissions		6,428,676,967	15,931,625,072
Variation in RIVM methodology		490,003,103	490,003,103
Notice of deficiency		4,714,347,682	3,736,545,365
Other		670,225,203	434,771,408
	¢	21,329,839,856	28,467,752,780

As of December 31, movement in provisions is as follows:

		2021			
		Severance benefits	Litigation	Other	Total
Balance as of December 31, 2020	¢	284,090,167	6,831,546,344	21,352,116,269	28,467,752,780
Increase in provision		120,315,489	1,356,255,887	5,092,180,705	6,568,752,081
Used		(452,846)	(270,055,587)	(13,310,982,233)	(13,581,490,666)
Decrease in provision		(72,979,233)	-	(52,195,106)	(125,174,339)
Balance as of December 31, 2021	¢	330,973,577	7,917,746,644	13,081,119,635	21,329,839,856

		2020			
		Severance benefits	Litigation	Other	Total
Balance as of December 31, 2019	¢	471,129,892	7,553,338,876	23,723,682,727	31,748,151,495
Increase in provision		80,767,393	771,653,478	6,522,769,242	7,375,190,113
Used		(16,876,113)	(234,221,669)	(3,189,136,299)	(3,440,234,081)
Decrease in provision		(250,931,005)	(1,259,224,341)	(5,705,199,401)	(7,215,354,747)
Balance as of December 31, 2020	¢	284,090,167	6,831,546,344	21,352,116,269	28,467,752,780

(Continued)

As of December 31, the Bank is a defendant in litigation, and it considers an outflow of economic benefits. The Bank has estimated future outflows and made the following provisions:

		Claimed amount		Provision	
Type		2021	2020	2021	2020
Ordinary - in colones	¢	18,649,213,593	18,579,083,419	4,414,045,298	4,076,000,446
Ordinary - in US dollars		135,030,173,609	132,624,641,534	2,920,760,287	2,188,079,724
Criminal - in colones		1,020,877,223	1,020,877,223	-	-
Labor - in colones		879,064,573	879,064,573	582,941,059	567,466,174
	¢	155,579,328,998	153,103,666,749	7,917,746,644	6,831,546,344

(Continued)

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Notes to the Separate Financial Statements

(23) Other sundry accounts payable

As of December 31, other sundry accounts payable are as follows:

		2021	2020
Professional fees	¢	8,845,876	1,514,876
Creditors - goods and services		5,355,559,161	6,972,034,824
Value added tax		137,495,130	69,378,032
Employer contributions		9,968,942,445	7,332,734,287
Court-ordered withholdings		3,863,009,441	3,642,668,291
Tax withholdings		2,153,423,360	2,037,518,939
Employee withholdings		738,916,203	670,860,920
Other third-party withholdings		6,999,013	184,503,943
Compensation		15,930,916,346	9,656,630,438
Statutory allocations		15,750,985,266	10,469,075,982
Clearing house operations		339,051,671	207,654,419
Accrued vacation		4,803,113,288	4,162,161,359
Accrued statutory Christmas bonus		1,833,586,655	1,279,105,779
Foreclosed assets		142,060,903	198,833,316
Provisional deposits for the payment of premiums		2,106,711,540	2,063,670,964
Direct contracts with the Government Purchases department – various		669,279,588	974,210,561
Accounts due to customers *(1)*		21,165,923	13,575,039
SICOP guarantees		1,598,166,821	1,422,035,747
Amounts received for partial sales of foreclosed assets		525,977,790	635,281,514
Allocation for petty cash differences		574,083,215	583,322,866
Master Card and Visa payments		1,706,268,154	1,296,320,981
Interest rate futures - Hedges (Note 11)		14,185,350	-
Other various creditors		2,940,550,055	1,642,405,675
	¢	71,189,293,194	55,515,498,752

(1) Accounts due to customers are related to dividends, sales or liquidations pending instructions by foreign investors.

(24) Other liabilities

As of December 31, other liabilities are as follows:

		2021	2020
Deferred income:			
Deferred fees and commissions for trust management	¢	88,200,061	72,347,267
		88,200,061	72,347,267
Operations pending application:			
Operations pending settlement		16,752,239,574	25,188,593,904
Other operations pending settlement		10,135,704,410	11,791,173,967
		26,887,943,984	36,979,767,871
	¢	26,976,144,045	37,052,115,138

(25) Subordinated obligations

As of December 31, subordinated obligations are as follows:

Annual interest rate	Term	Maturity		2021	2020
6-month LIBOR + 4.50% in the first 5 years and 6-month LIBOR + 5.00% thereafter	10	05/27/2024	US$	50,000,000	70,000,000
6-month LIBOR + 5.25% in the first 5 years and 6-month LIBOR + 5.75% thereafter	15	10/23/2029		24,000,000	27,000,000
8.28% per annum *(1)*	10	09/29/2031		15,000,000	-
			US$	89,000,000	97,000,000
Total equivalent in colones			¢	57,427,250,000	59,878,100,000
Finance charges payable				940,121,894	1,071,913,196
			¢	58,367,371,894	60,950,013,196

(1) Credit facility agreement CCR1006 02 subscribed by Banco Nacional de Costa Rica and the French Development Agency, authorized by SUGEF on December 23, 2021.

In accordance with IRNBS No. 1644, 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 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.

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.

(26) Equity

(a) Share capital

As of December 31, the Bank's share capital is as follows:

		2021	2020
Capital under Law No. 1644	¢	144,618,072,265	144,618,072,265
Bank capitalization bonds		27,618,957,837	27,618,957,837
	¢	172,237,030,102	172,237,030,102

(b) Capital reserves

As of December 31, capital reserves are as follows:

		2021	2020
Legal reserve	¢	343,173,824,949	359,235,472,801
Statutory reserve for foreclosed assets		3,248,004,049	1,730,214,922
Excess of statutory reserve for loans		7,124,739,246	8,231,223,420
Statutory dynamic provision		11,190,669,854	12,165,679,183
	¢	364,737,238,098	381,362,590,326

(c) Equity of the Development Financing Fund

The allocation of the Bank's earnings for the creation of the Development Financing Fund (FOFIDE) amounts to ¢41,687,504,022 (2020: ¢39,043,365,123).

(27) Commitments and contingencies

As of December 31, the Bank has off-balance sheet commitments and contingencies that arise in the normal course of business and involve elements of credit and liquidity risk. As of that date, the notional amounts of foreign exchange derivatives are as follows:

		2021	2020
Performance bonds	¢	42,618,377,673	43,130,640,271
Bid bonds		2,180,865,597	3,226,116,392
Other guarantees		445,367,225	698,212,573
Letters of credit		4,124,817,367	2,514,802,830
Credits pending disbursement		124,833,348	130,054,473
		49,494,261,210	49,699,826,539
Pre-approved lines of credit		293,974,025,045	276,948,161,866
Other contingencies not related to credits		83,658,103	83,658,102
Other contingencies - Pending litigation and lawsuits (Note 47)		155,579,328,998	153,103,666,749
		449,637,012,146	430,135,486,717
Sales of FX futures - Other than hedges		-	1,419,790,000
	¢	499,131,273,356	481,255,103,256

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.

(Continued)

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

(28) Trust assets

The Bank provides trust services whereby it manages assets per the instructions of the customer. The Bank receives a fee for providing those services. Those assets, liabilities, and equity are not recognized in the Bank's separate 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

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As of December 31, 2021, 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 of stock and cash management	Guaranties and cash management	Custody of stock	Management, custody and guaranty	Presale management	Guaranty and custody of stock	Total
Trust assets	¢	180,811,647	9,725,684	13,547,026	-	18,544	-	-	758,785	-	20,022,675,423	1,290,500	5,593	20,228,833,202
Cash and due from banks		248,428,363,414	8,574,990,950	-	2,328,906,164,576	4,005,247,820	-	2,520,765	104,641,328	-	245,395,006	-	657,852	2,590,267,981,711
Investments in financial instruments		3,376,455,012	-	1,102,694,752	-	-	-	-	-	-	-	-	-	4,479,149,764
Loan portfolio		149,198,351,969	29,135,410,270	1,959,416,934	67,511,266	183,780	-	-	176,186,093	-	-	-	241,116	180,537,301,428
Accounts and accrued interest receivable		115,090,752	-	6,779,434	-	-	-	-	-	-	-	-	-	121,870,186
Foreclosed assets		-	-	-	4,595,000,000	24,306,525	164,000	-	-	25,206,000	589,464,221	-	4,740,000	5,238,880,746
Investments in other companies		752,822,519	27,113,866,007	-	122,026,030,187	662,837,677	-	-	8,719,375,327	-	-	-	3,004,248,009	162,279,179,726
Property and equipment		22,370,111,737	2,796,050,506	1,262	235,000,000	6,847,664	-	-	799,362	-	4,513,506,224	-	1,674,505,320	31,596,822,075
	¢	424,422,007,050	67,630,043,417	3,082,439,408	2,455,829,706,029	4,699,442,010	164,000	2,520,765	9,001,760,895	25,206,000	25,371,040,874	1,290,500	4,684,397,890	2,994,750,018,838

(Continued)

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Notes to the Separate Financial Statements

As of December 31, 2020, 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 of stock and cash management	Guaranties and cash management	Custody of stock	Management, custody and guaranty	Guaranty and custody of stock	Total
Trust assets													
Cash and due from banks	¢	152,212,681	13,742,792	32,573,063	-	50,948	-	-	112,688,268	-	-	-	311,267,752
Investments in financial instruments		257,725,189,796	9,454,518,197	-	1,343,755,390,190	3,913,798,890	-	2,476,638	99,318,230	-	25,040,096	623,863	1,614,976,355,900
Loan portfolio		3,381,226,990	-	1,366,285,824	-	-	-	-	-	-	-	-	4,747,512,814
Accounts and accrued interest receivable		124,970,432,328	28,641,538,113	1,809,785,284	48,243,476	4,130	-	-	150,558,000	-	-	226,600	155,620,787,931
Foreclosed assets		156,440,366	-	10,344,986	-	-	-	-	-	-	-	-	166,785,352
Investments in other companies		-	-	-	200,000,000	3,381,730	176,000	-	-	36,000	-	4,740,000	208,333,730
Property and equipment		814,658,626	41,230,798,513	-	117,743,721,852	713,984,053	-	-	8,719,375,327	-	-	3,004,248,009	172,226,786,380
Other assets		26,057,695,783	20,546,461,139	-	235,000,000	6,129,435	-	-	-	-	4,182,208,000	1,674,504,726	52,701,999,083
	¢	413,257,856,570	99,887,058,754	3,218,989,157	1,461,982,355,518	4,637,349,186	176,000	2,476,638	9,081,939,825	36,000	4,207,248,096	4,684,343,198	2,000,959,828,942

(Continued)

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

a) Housing mortgage

These trusts are exclusively dedicated to managing housing loan portfolios.

b) Cash or property management

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) Portfolio management

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 socioeconomic 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 per the instructions of the trustor.

g) Testamentary

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.

(Continued)

(29) Other debit memoranda accounts

As of December 31, other debit memoranda accounts are as follows:

		2021	2020
Chattel mortgage	¢	943,997,162	189,575,678
Guarantees on financial instruments		-	70,693,196
Other guarantees received in the Bank's custody		7,425,158,370,323	6,552,345,391,910
Lines of credit granted but unused		397,631,709,645	406,505,614,639
Loans pending disbursement		147,964,508,341	172,571,373,581
Overdrafts obtained but unused		60,701,458	111,415,987
Loans settled		415,127,217,926	338,806,069,999
Other accounts receivable settled		20,675,349,825	14,954,527,504
Accrued interest receivable settled		38,305,871,616	30,839,072,824
Interest income on non-accrual loans of loan portfolio		35,790,789,103	30,647,147,213
Supporting documentation received in the Bank's custody		9,004,104	2,384
Securities issued pending placement		34,444,000,000	6,248,000,000
Notified letters of credit		5,257,203,839	4,025,233,727
Notional value subject to interest rate futures (Note 11)		216,430,400,250	396,628,213,300
Reversals made to income accounts for the year		50,805,600,120	30,789,263,983
Reversals made to expense accounts for the year		89,622,428,300	52,976,645,521
Nondeductible expenses		23,231,315,038	12,389,918,809
Nontaxable income		28,031,902,872	13,624,603,217
Other memoranda accounts		229,014,010,794	233,638,123,692
		9,158,504,380,716	8,297,360,887,164
Third-party debit memoranda accounts		1,742,711,823,628	1,520,637,448,493
Own debit memoranda accounts for custodial activities		647,586,882,558	616,184,560,408
Third-party debit memoranda accounts for custodial activities		15,375,290,853,495	12,564,395,883,368
	¢	26,924,093,940,397	22,998,578,779,433

(Continued)

(30) Income from financial instruments

For the year ended December 31, income from financial instruments are as follows:

		2021	2020
Cash and due from banks:			
Checking accounts and demand deposits in foreign entities	¢	1,065,545,581	2,502,924,461
Financial instruments:			
Investments at fair value through profit or loss		194,026,256	1,320,339,496
Investments at fair value through other comprehensive income		33,431,114,142	36,420,133,304
Investments at amortized cost		21,015,302,410	26,121,582,865
Investments in past due and restricted securities		526,632,932	604,422,523
		55,167,075,740	64,466,478,188
	¢	56,232,621,321	66,969,402,649

(31) Income from loan portfolio

r the year ended December 31, income from the loan portfolio is as follows:

		2021	2020
Current loans:			
Individuals	¢	149,791,924,743	165,941,494,536
Development Banking System		4,843,040,529	5,780,524,887
Business		57,932,354,890	73,586,289,109
Corporate		70,821,776,726	73,009,397,071
Public sector		8,803,058,917	10,713,820,757
Financial sector		5,064,156,745	6,920,473,622
		297,256,312,550	335,951,999,982
Past due loans and loans in legal collection:			
Individuals		20,961,333,242	24,636,637,061
Development Banking System		513,035,200	656,321,295
Business		10,486,758,469	11,612,253,549
Corporate		2,453,937,947	2,716,652,384
Public sector		119,645,702	210,000,092
Financial sector		6,089,390	3,055,674
In legal collection		11,462,710,353	9,087,419,162
Amortization of net commission of incremental direct costs related to loans		1,438,839,208	1,141,043,704
		47,442,349,511	50,063,382,921
	¢	344,698,662,061	386,015,382,903

(Continued)

(32) Other finance income

For the year ended December 31, other finance income is as follows:

		2021	2020
Fees and commissions on letters of credit	¢	15,905,629	13,848,543
Fees and commissions on guarantees granted		523,603,095	932,657,835
Gain on sale of financial instruments		784,462,202	256,969,387
Gain on fair value hedge for item measured at cost		7,154,899,859	11,879,978,245
Other sundry finance income		2,856,293,852	3,580,915,993
	¢	11,335,164,637	16,664,370,003

(33) Finance costs for obligations with the public

For the year ended December 31, finance costs for obligations with the public are as follows:

		2021	2020
Demand deposits	¢	38,621,033,867	53,068,558,746
Term deposits		80,121,029,700	114,964,243,581
	¢	118,742,063,567	168,032,802,327

(34) Finance costs for obligations with financial entities

For the year ended December 31, finance costs for obligations with financial entities are as follows:

		2021	2020
Demand obligations	¢	1,442,705,815	2,001,185,442
Term obligations		32,148,500,820	43,913,263,336
	¢	33,591,206,635	45,914,448,778

(Continued)

(35) Other finance costs

For the year ended December 31, other finance costs are as follows:

		2021	2020
Fees and commissions on letters of credit obtained	¢	220,860,731	155,017,759
Loss on hedged item measured at cost from fair value hedge on interest rate risk		943,588,321	19,647,978,818
Other sundry finance costs		522,658,756	786,643,786
	¢	1,687,107,808	20,589,640,363

(36) Expenses for allowance for impairment of assets

For the year ended December 31, expenses for allowance for impairment of assets are as follows:

		2021	2020
Allowance for loan losses (Note 12)	¢	75,897,703,720	64,281,438,659
Allowance for impairment of other accounts receivable (Note 13)		879,441,297	1,080,131,153
Allowance for stand-by credit losses (Note 12)		-	401,000,000
General and counter-cyclical allowance for loan portfolio		2,570,000,000	3,551,651,401
General and counter-cyclical allowance for stand-by credit losses (Note 12)		120,000,001	144,025,566
Allowance for impairment of investments at fair value through other comprehensive income		3,068,109,510	584,206,968
Allowance for impairment of financial instruments at amortized cost		2,038,669,533	1,850,573,232
Allowance for impairment of operations with derivative financial instruments		12,542	58,699
	¢	84,573,936,603	71,893,085,678

(Continued)

(37) Income from recovery of assets and decreases in allowances and provisions

For the year ended December 31, income from recovery of assets and decreases in allowances and provisions is as follows:

		2021	2020
Recovery of loan write-offs	¢	14,252,038,492	8,288,214,341
Recovery of accounts receivable write-offs		4,324,002	1,518,313
Decrease in allowance for impairment of other accounts receivable (Note 13)		521,599,531	752,680,302
Decrease in allowance for impairment of investments in financial instruments		2,348,764,741	494,927,058
	¢	17,126,726,766	9,537,340,014

(38) Income from service fees and commissions

For the year ended December 31, operating income from service fees and commissions is as follows:

		2021	2020
Drafts and transfers	¢	10,042,765,381	8,799,149,446
Certified checks		2,629,365	2,726,197
Trusts		1,911,738,587	1,572,694,281
Custodial services		1,835,244,685	1,591,127,420
Banking mandates		141,906	172,009
Collections		22,825,984	15,747,309
Credit cards		56,275,549,025	54,843,227,150
Management services		4,266,510,481	3,734,313,322
Insurance underwriting		761,452,170	626,728,030
Transactions with related parties		840,664,715	631,879,091
Commissions charged to other affiliates due to covenants		12,934,350,761	12,015,356,868
Servibanca local interchange		22,502,063,318	22,013,710,840
Other service fees and commissions		8,954,061,762	6,804,047,569
	¢	120,349,998,140	112,650,879,532

(Continued)

(39) Other operating income

For the year ended December 31, other operating income is as follows:

		2021	2020
Recovery of expenses *(1)*	¢	2,466,237,961	4,154,296,421
Net valuation of other assets (Note 6-d)		171,701,168	1,130,256,775
Other income from accounts receivable		1,371,484	3,309,730
Savings accounts liquidation		193,919,395	204,079,840
Administrative charges - PMEP		657,877,412	1,476,263,489
Liquidation of term certificate of deposit not claimed		678,739,121	585,640,409
Liquidation of checks		227,394,936	-
Withholdings from vendors		549,863,370	208,090,012
Investments in companies		-	742,690,696
Excess cash from human teller		168,916,078	141,985,000
Credit card commission		261,230,949	-
Other operating income		824,998,045	1,140,604,294
Decrease in provisions *(2)*		125,174,339	7,215,354,747
	¢	6,327,424,258	17,002,571,413

(1) When the *Law of Public Administration's Salaries* (Law No. 9908) became effective, the provision for the payment of employee annuities was reversed.

(2) In 2020, the excess provision for the Disability, Old Age and Death benefit system was eliminated.

(Continued)

(40) Expenses for foreclosed assets

For the year ended December 31, expenses for foreclosed assets are as follows:

		2021	2020
Property and other assets acquired in lieu of payment	¢	327,264,315	80,271,714
Loss on sale of assets awarded in judicial auctions		8,143,122,929	6,206,194,397
Management of assets received in lieu of payment		29,279,999	20,071,031
Management of assets awarded in judicial auctions		4,027,670,126	4,649,099,639
Property and other assets acquired in lieu of payment (Note 14)		64,207,126	58,468,041
Loss on allowance for impairment of foreclosed assets and per legal requirement		1,668,551,502	9,570,456,255
Other expenses for foreclosed assets (Note 14)		26,988,657	31,918,043
	¢	14,287,084,654	20,616,479,120

(41) Provision expenses

For the year ended December 31, provision expenses are as follows:

		2021	2020
Severance benefits	¢	120,315,489	80,767,393
Pending litigation		1,356,255,887	771,653,478
"BN Premios" points program		2,529,679,209	1,932,421,215
Case of the manager commissions with CCSS		912,158,736	836,629,027
Case of the RIVM contribution		-	600,920,714
Notice of deficiency		977,802,317	1,466,703,475
Other provisions		672,540,443	1,686,094,811
	¢	6,568,752,081	7,375,190,113

(Continued)

(42) Other operating expenses

For the year ended December 31, other operating expenses are as follows:

		2021	2020
Penalties for noncompliance with regulatory legal provisions		1,718,644	6,300
Net valuation of other liabilities (Note 6-d)		286,917,462	1,410,449,477
Value-added tax expense		1,143,092,502	950,123,482
Income tax on foreign remittances		7,568,413	6,899,689
8% and 15% tax on income from interest on investments in financial instruments		219,657,408	-
Property tax		254,437,366	244,378,893
Patents		633,838,024	1,112,385,806
Other local taxes		87,330	14,712,764
Other foreign taxes		22,245	4,223
Transfer to FINADE		2,038,914,810	2,871,963,353
Amortization of deferred direct costs related to loans		366,014,397	354,524,714
Return of products charged from customers		-	471,871,256
Costs of microfinance insurance policies		3,368,466,623	3,250,058,530
Authorization abroad		2,186,169,100	1,611,367,730
Base I and II fund disbursements		17,304,771,980	14,085,175,314
Life insurance unpaid balance		8,648,777,832	8,280,905,192
Software maintenance and licenses		11,839,032,850	12,612,894,600
Sundry operating expenses		6,460,826,504	5,367,005,196
Other expenses for sundry assets		159,464	216,984
	¢	54,760,472,954	52,644,943,503

(Continued)

(43) Personnel expenses

For the year ended December 31, personnel expenses are as follows:

		2021	2020
Salaries and bonuses, permanent staff	¢	62,803,968,380	63,016,230,762
Salaries and bonuses, contractors		692,901,049	1,223,550,492
Compensation for directors and statutory examiners		140,546,858	138,335,216
Overtime		446,039,025	491,172,447
Travel expenses		183,719,576	234,181,344
Statutory Christmas bonus		7,069,696,521	6,649,146,627
Vacation		5,721,428,110	5,274,750,239
Incentives		5,257,966,007	3,589,329,195
Other compensation		4,941,041,661	3,373,870,095
Severance benefits		4,198,324,161	3,964,878,748
Employer social security taxes		28,567,754,521	25,579,918,604
Refreshments		44,082,271	343,085,321
Uniforms		399,760,760	431,730,921
Training		513,616,017	377,121,855
Employee insurance		216,624,712	197,387,792
Back-to-school bonus		6,585,757,985	6,238,808,962
Mandatory retirement savings account		1,385,071,087	2,399,068,926
Other personnel expenses		668,970,657	842,389,818
	¢	129,837,269,358	124,364,957,364

(44) Other administrative expenses

For the year ended December 31, other administrative expenses are as follows:

		2021	2020
Outsourcing	¢	25,023,267,563	21,926,300,783
Transportation and communications		3,252,107,929	3,502,156,570
Infrastructure		25,472,068,155	26,460,541,845
Overhead		18,240,043,785	17,603,093,637
	¢	71,987,487,432	69,492,092,835

(45) Statutory allocations

For the year ended December 31, statutory allocations are as follows:

		2021	2020
CONAPE - 5%	¢	2,991,108,826	2,535,644,078
CNE - 3%		1,450,658,759	1,216,622,021
INFOCOOP - 10%		4,178,337,192	3,506,651,920
RIVM - 15%		3,920,722,526	3,210,157,963
	¢	12,540,827,303	10,469,075,982

(46) Fair value of financial instruments

As of December 31, the carrying amounts and fair values of all financial assets and liabilities that are not carried at fair value are compared in the following table:

		2021			
		Carrying amount	Level	Fair value	Level
Financial assets:					
Cash and due from banks	¢	1,352,823,921,973		1,352,823,921,973	
Loan portfolio		4,613,265,731,396	(3)	4,313,851,040,344	(3)
	¢	5,966,089,653,369		5,666,674,962,317	
Financial liabilities:					
Demand deposits from the public and financial entities	¢	4,494,355,769,905		4,494,355,769,905	
Other demand obligations with the public		16,045,803,541	(3)	16,045,803,541	(3)
Term deposits from the public and financial entities		2,541,115,789,031	(3)	2,527,806,130,895	(3)
	¢	7,051,517,362,477		7,038,207,704,341	

		2020			
		Carrying amount	Level	Fair value	Level
Financial assets:					
Cash and due from banks	¢	1,379,990,856,795		1,379,990,856,795	
Loan portfolio		4,452,105,299,779	(3)	4,235,005,218,527	(3)
	¢	5,832,096,156,574		5,614,996,075,322	
Financial liabilities:					
Demand deposits from the public and financial entities	¢	3,639,923,366,334		3,639,923,366,334	
Other demand obligations with the public		15,836,019,871	(3)	15,836,019,871	(3)
Term deposits from the public and financial entities		2,875,568,163,507	(3)	2,901,080,548,166	(3)
	¢	6,531,327,549,712		6,556,839,934,371	

(Continued)

Fair value estimates

i. Valuation techniques and significant unobservable inputs

The following assumptions were used by management to estimate the fair value of each class of financial instruments, both on and off the separate 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 due to the short-term nature of these instruments.

(b) 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 date. Future expected cash flows for loans are discounted at the interest rates offered for similar loans to new borrowers as of December 31, 2021 and 2020.

(c) 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.

(d) Obligations with entities

The fair value of obligations with entities is based on discounting cash flows at the interest rates in effect.

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 accuracy. Estimates could vary significantly if changes are made to those assumptions.

(Continued)

As of December 31, financial instruments measured at fair value by level in the fair value hierarchy are as follows:

		2021			
		Level 1	Level 2	Level 3	Total
Fair value through profit or loss		-	28,670,200,101	4,568,628,100	33,238,828,201
Fair value through other comprehensive income	¢	747,648,231,032	3,892,580,138	-	751,540,811,170
Amortized cost		913,789,586,706	-	-	913,789,586,706
Derivative financial instruments		-	-	7,723,704,438	7,723,704,438
Term obligations with foreign financial entities	¢	-	-	212,580,207,607	212,580,207,607

		2020			
		Level 1	Level 2	Level 3	Total
Fair value through profit or loss	¢	-	13,801,674,690	4,370,730,920	18,172,405,610
Fair value through other comprehensive income		688,922,266,364	5,648,062,549	-	694,570,328,913
Amortized cost		571,735,269,007	-	-	571,735,269,007
Derivative financial instruments		-	-	15,753,371,710	15,753,371,710
Term obligations with foreign financial entities	¢	-	-	400,679,619,801	400,679,619,801

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).

ii Recurring level 3 fair values

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

	As of December 31,					
	2021			2020		
	Fair value through profit or loss	Derivative financial instruments	Term obligations with foreign financial entities	Fair value through profit or loss	Derivative financial instruments	Term obligations with foreign financial entities
Opening balance	¢ 4,370,730,920	15,740,048,459	400,679,619,801	4,488,288,925	10,742,740,489	489,650,619,452
Valuation	-	(8,729,019,146)	(5,816,934,282)	1,564,211,829	15,740,048,459	12,308,739,402
Amortizations	-	-	(273,124,830)	-	-	1,720,311,005
Exchange differences	197,897,180	712,675,125	(182,009,353,080)	(1,681,769,834)	(10,729,417,238)	(103,000,050,058)
Closing balance	¢ 4,568,628,100	7,723,704,438	212,580,207,607	4,370,730,920	15,753,371,710	400,679,619,801

iii Sensitivity analysis

A sensitivity analysis was performed on the discount rate used to determine the fair value of investments at fair value through other comprehensive income categorized as Level 3, using a number of unobservable inputs that may have an effect on the financial information. The analysis involved a 1% increase in the discount rate.

(47) Contingencies

As of December 31, the Bank is a defendant in ordinary, labor and criminal lawsuits as follows:

Number of cases as defendant			Total estimated amount	
2021	2020	Phase	2021	2020
323	375	First instance	¢ 98,977,210,067	127,287,512,693
18	16	Second instance	9,005,118,064	20,241,965,937
49	13	Appeal	47,597,000,867	5,574,188,119
390	404	(Note 22)	¢ 155,579,328,998	153,103,666,749

Legal actions filed against the Bank are booked in memoranda accounts under "Other contingencies - pending litigation and lawsuits".

As of December 31, the Bank is a claimant in ordinary, labor and criminal lawsuits for which the outcome is uncertain; they are not booked in the accounting records. As of December 31, lawsuits are as follows:

Number of cases as claimant			Total estimated amount	
2021	2020	Phase	2021	2020
322	339	First instance	¢ 79,987,551,144	80,325,129,525
1	1	Second instance	375,839,600	375,839,600
2	-	Appeal	2,844,233,566	-
325	340		¢ 83,207,624,310	80,700,969,125

Additionally, the Bank is a defendant in one lawsuit related to the payment of SEDI. The file for such proceedings is File No. 5-008666-1027-CA of the Administrative Court, at 10:45 hours of November 20, 2015, received on December 15, 2015. As of December 31, 2021, the Bank booked a provision in the amount of ¢861,008,035 for that lawsuit (2020: ¢820,669,567.33).

The following lawsuits are also worth noting:

- *File No. 14-003379-1027-CA*

  ✓ Statement of facts: The plaintiffs seek the payment of damages by the Bank to all the plaintiffs as well as compensation for pain and suffering caused due to the inability to acquire decent housing, as a result of apparent anomalies regarding the management of credits for Grupo Zion, S.A. to build the Bariloche Real condominium. Additionally, it has had media coverage.

  ✓ Current status: The resolution of April 10, 2018 at 17:15 ordered the separation of the case into separate files for each of the Bank members. This resolution was unsuccessfully appealed by the plaintiff's representatives. Currently, a number of separate lawsuits were presented to the Bank, which is in the process of filing the corresponding responses and some preliminary hearings have been summoned, while other summons for public trial are pending or issue of a resolution, having been declared a question of law.

- *File No. 08-000388-0419-AG*

  ✓ Court: Agrarian Court of Corredores

  ✓ Statement of facts: The proceedings seek to declare the liability of CORBANA, as Trustee of a banana plantation Management Trust, in which Banco Nacional de Costa Rica was the Trust Beneficiary. In resolution No. 92-2015 of first instance, the Agrarian Court ruled in favor of the Banco Nacional de Costa Rica. The Agrarian Court accepted the objection of statute of limitations, since the lawsuit was filed four years after negative prescription, as per Article 968 of the Code of Commerce.

  ✓ Current Status: Through judgment number 000261-F-2018, decision from May 23, 2018 at 11:59, the Agrarian Court of San José confirmed the judgment of first instance. The plaintiff (the Cooperative) filed an appeal for review on April 5, 2018. It is currently in the First Chamber of Appeals, awaiting a decision by said court.

- *File No. 08-000232-0419-AG*

  ✓ Court: Agrarian Court of Corredores

  ✓ Statement of facts: This process was filed by Banco Nacional de Costa Rica against Surcoop R.L. It seeks to nullify the auction, awarding, and registration of lots of the Agrarian Court of Corredores processed through file No. 97-010656-1701 AG.

  ✓ Current status: Banco Nacional de Costa Rica (the plaintiff) invoked the judgment of first instance; the Agrarian Supreme Court, through the decision of March 3, 2019 at 14:30, rejected the statute of limitations, with a dissenting opinion. It indicated that the judge of first instance must adjudge the claims of the case. Both Banco Nacional de Costa Rica and CORBANA filed an appeal for review. Through Vote 000260-F-S1-2019, decision of May 26, 2019 at 13:50, the First Chamber of Appeals rejected the appeal for review and confirmed the judgment. Consequently, the file is currently at the Agrarian Court of Corredores, and the issue of a new judgment is pending.

- *File No. 11-001042-0612-PE*

  - ✓ Court: Office of Economic, Tax, and Customs Crimes

  - ✓ Statement of facts: Irregularities were reported with respect to the company Zion and the process to grant credits to that company, misuse of resources, presentation of fake documents to Banco Nacional de Costa Rica to obtain credit approval, and the apparent participation of some of the employees of Banco Nacional de Costa Rica.

  - ✓ Current status: The Public Prosecutor's Office filed an accusation against the real estate development company in charge of the project and three employees of Banco Nacional de Costa Rica.

  - ✓ Banco Nacional de Costa Rica filed a claim and civil action only against the real estate development company in charge of the project and not against the employees of Banco Nacional de Costa Rica, to prevent strengthening the civil actions against that bank. There are several civil actions against Banco Nacional de Costa Rica; the Criminal Court of Grecia, through resolution of February 23, 2021 at 07:30, declared its lack of jurisdiction and forwarded the case to the Criminal Court of Finance. The Criminal Court of Finance of the Second Judicial Circuit of San José has not provided the date for the preliminary hearing.

- *File No.: 14-008626-1027-CA*

  - ✓ Statement of facts: The plaintiffs seek Banco Nacional de Costa Rica to be declared liable for the payment of damages to all investors of the "Management Trust for the Real Estate Development and Private issue of Securities of Playa Coyote Project" (Fideicomiso de Administración de Desarrollo Inmobiliario y de Emisión Privada de Valores Proyecto Playa Coyote).

  - ✓ Current status: A new appeal for review was filed before the First Chamber, insofar as the new resolution of first instance requires Banco Nacional de Costa Rica to pay damages to the plaintiffs, in relation to the issue of Series A bonds. Therefore, Banco Nacional de Costa Rica will file a new remedy.

- *File No.: 15-002321-1027-CA*

  ✓ Statement of facts: Banco Nacional de Costa Rica filed a suit against the Costa Rican Social Security Administration (CCSS) for additional payrolls presented for the collection of commissions from the employees of the Bank. Article 173 of the Internal Regulations of the National Banking System (IRNBS) sets forth that those commissions are exempt from employer and employee contributions.

  Current status: An amended complaint which adds new facts was added to the proceedings in order to submit to the Court the decisions of the Costa Rican Social Security Administration in which Banco Nacional de Costa Rica was allowed to exclude the subsidiaries from the collection of the parafiscal tax. The oral proceedings are pending; the date was set for August 8, 2022.

(48) Emergency caused by COVID-19

In December 2019 the appearance of a new strain of coronavirus was identified, causing the COVID-19 global pandemic during the first quarter of 2020. The coronavirus has negatively affected the economic conditions of companies worldwide, generating a macroeconomic uncertainty that may significantly affect our operations as well as those of our customers and vendors.

The general effect of the coronavirus outbreak is uncertain at this time. Consequently, we are still in the process of analyzing and forecasting the potential impact on our operations. The Bank's management will continue to monitor and modify its operating and financial strategies to mitigate the potential risks to our business.

As part of the measures adopted to contain the crisis caused by the pandemic, the Bank evaluated the loans of borrowers who requested it since their payment capacity was affected, providing a temporary modification to help them face the Covid-19 crisis.

As a result, as of December 31, 2021, the loan portfolio that required at least one modification to the originally agreed conditions amounts to ¢1,984,852,553,271, representing 42.73% of the total loan portfolio (2020: ¢1,838,897,871,649, representing 42.19% of the total loan portfolio).

As of December 31, the loan portfolio, restructured at least once due to Covid-19, by economic activity, is as follows:

		2021	2020
Agriculture and forestry	¢	50,679,602,088	55,617,553,745
Trade		177,668,570,650	236,646,445,127
Construction		57,079,493,093	40,275,335,431
Consumer or personal loans		140,315,345,556	181,993,271,368
Electricity, water, sanitation and other related sectors		170,683,996,232	317,755,814
Mining		315,774,759	345,022,348
Livestock, hunting and fishing		33,336,273,387	31,765,420,846
Industry		87,566,129,712	77,047,719,294
Services		528,078,318,447	418,549,449,578
Financial service		31,625,084,816	2,632,942,189
Transportation, communication and storage		38,823,600,256	41,968,088,183
Tourist		163,210,454,349	172,964,482,499
Housing		505,469,909,927	578,774,385,227
Sub-total		1,984,852,553,272	1,838,897,871,649
Accounts and accrued interest receivable		2,176,885,953	60,587,005,579
Loans restructured due to COVID-19		1,987,029,439,225	1,899,484,877,228
Allowance for doubtful accounts		(48,608,619,661)	(38,070,471,241)
Total loan portfolio, net	¢	1,938,420,819,564	1,861,414,405,987

As of December 31, the loan portfolio, restructured at least once due to Covid-19, by arrears, is as follows:

		2021	2020
Current	¢	1,846,458,129,874	1,772,706,247,740
1 to 30 days		34,458,315,104	21,882,743,098
31 to 60 days		39,761,510,557	18,211,697,502
61 to 90 days		15,106,421,740	7,216,586,852
91 to 120 days		7,235,778,972	6,561,102,392
121 to 150 days		4,449,181,727	8,320,591,011
In legal collection		37,383,215,298	3,998,903,054
		1,984,852,553,272	1,838,897,871,649
Accounts and accrued interest receivable		2,176,885,953	60,587,005,579
Total loans restructured due to COVID-19		1,987,029,439,225	1,899,484,877,228
Allowance for loan losses		(48,608,619,661)	(38,070,471,241)
Loan portfolio, net	¢	1,938,420,819,564	1,861,414,405,987

(Continued)

As of December 31, the loan portfolio, restructured at least once due to Covid-19, by guarantee, is as follows:

		2021	2020
Collateral	¢	58,294,189,127	92,547,319,837
Surety		20,670,755,440	-
Assignment of loans		87,299,935,436	-
Back-to-back		3,884,342,685	-
Mortgage		794,772,089,972	1,270,293,892,300
Trust		190,541,750,232	476,056,659,512
Surety - Mortgage		189,921,758,678	-
Surety - Trust		278,784,020,584	-
Other		290,166,392,276	-
Not assigned		3,212,232,131	-
Surety - Collateral		9,249,816,018	-
Collateral - Mortgage		1,153,368,479	-
Collateral - Securities		16,574,399	-
Surety - Collateral - Mortgage		3,634,064,223	-
Securities		29,191,295,063	-
Mortgage - Trust		199,507,307	-
Collateral - Back-to-back		8,753,998	-
Surety - Securities		73,099,529	-
Bond guaranteed by mortgage		8,973,296	-
Collateral - Trust		23,769,634,399	-
		1,984,852,553,272	1,838,897,871,649
Accounts and accrued interest receivable		2,176,885,953	60,587,005,579
Loans restructured due to COVID-19		1,987,029,439,225	1,899,484,877,228
Allowance for loan losses		(48,608,619,661)	(38,070,471,241)
Loan portfolio, net	¢	1,938,420,819,564	1,861,414,405,987

As of December 31, 2021, ¢1,984,852,553,272 maintain temporary credit conditions, which represents 42.73% of the entire loan portfolio (2020: ¢1,838,897,871,649, representing 4% of the total loan portfolio).

a) Operating measures

- The Bank constantly encourages customers to use digital channels: BN MOVIL, SINPE MOVIL, webpage and Contact Center.

- The Bank promoted COVID-19 vaccination; currently 90% of the Bank's employees have at least two doses of the vaccine.

(Continued)

- Hygiene measures were strengthened by installing portable handwash basins in high-transit offices (29 offices) and encouraging personnel and customers to wash their hands before and after their transactions, or at least once every hour.

- As of the date of this report, the Bank has 2,791 employees working from home, representing 54% of total employees. All positions that permit work from home have been implemented.

- The maximum number of customers was established according to the physical capacity of each office and protection screens are used to avoid contact.

- Some of the autobanks that were not in operation were activated once again.

- Of the bank's employees, 462 were identified as having health conditions that put them at a higher risk according to the Ministry of Health. That population was separated from processes involving attention to the public and most of them are working from home.

- The Bank's Emergency Institutional Commission meets continuously to implement the measures recommended by the Ministry of Health.

(Continued)

b) Measures to support customers with credits

On March 20, 2020, the Bank announced a program to support customers in different credit segments in order to help mitigate the negative effects caused by the COVID-19 pandemic. These segments are as follows:

- Individuals with housing, consumption or vehicle loans. Non-salaried, physical borrowers may dispense with loan installments for the next three months, with those installments being transferred to the final loan installment. As in the small- and medium-sized enterprise program, this adjustment is automatic. The customers that do not wish to take the benefit can continue to pay their installments normally by informing so through enabled channels.

- Credit card customers. Starting April 2020, non-salaried credit card borrowers will have the minimum payments of their installments for the following three months transferred to monthly installments payable after the fourth month.

- Small- and medium-sized enterprise: all borrowers (irrespective of the sector) with variable payments, may dispense with loan instalments for the next four months, with the installments being transferred to the final loan installment. The measure is automatic, so no further step will be required by the customer. The customers that do not wish to take the benefit can continue to pay their installments normally by informing so by telephone or through our website chat enabled for such purposes.

- Corporate banking (large enterprises) and medium enterprises. Only customers from trade and tourist activities, with variable payments, may dispense with loan installments for a term between three and nine months, with installments being transferred to the final loan installment to provide those entities with a financial relief. The adjustment is not automatic or the same in all cases but analyzed individually. The Bank has assigned executive to contact customers qualifying for this benefit. For customers from other previously identified vulnerable economic sectors, the Bank has also assigned a team of executives to contact customers and look for alternatives to make their operations sustainable.

(Continued)

In all cases, to be eligible for the benefit, customers should not have two or more readjustments made in the last 24 months. Additionally, customers are required to not exceed arrears of more than 60 days.

Moreover, we are complying with Official Letter SGF-1190-2020 dated April 1, 2020, which establishes that:

The accounting recognition of income earned has its origin in the payment obligation underlying in the contractual relationship between the borrower and the regulated entity, even if the parties agree to modify the contractual relationship, the obligation does not extinguish, interest continue to be earned, irrespectively of the date they are earned. For recording, regulated entities must apply what is provided in the International Financial Reporting Standards (IFRS).

c) <u>Liquidity measures</u>

The situation caused by the COVID-19 pandemic has impacted the national and global economy leading to a reduction of risk positions and a search for a safe shelter before the increased volatility that has emerged. The Corporate Office of Finance has been monitoring the developments in order to prevent any events, based on a process of three stages with defined functions and responsibilities, where "Stage I" is mild, attention is paid to early warning signs and preventive measures are taken, up to "Stage III", with more stressed conditions.

The Bank's Treasury Office has daily reports that allow the Bank to know about the liquidity status to make timely decisions and monitor regulatory indicators, such as term matching and the liquidity coverage ratio (LCR), for which capacity, appetite and tolerance levels are defined, and for which the need for differentiated actions are established.

d) Measures in the portfolio of investments at amortized cost

Due to the COVID-19 pandemic, the Bank has directly followed up on the corporate bonds portfolio, which has been affected by the crisis, making timely and proactive decisions according to the different perspectives and analysis of international specialists. Locally, quotes and negotiations of securities in the primary and secondary market are monitored daily, by participating in real time in the brokerage sessions of the National Stock Exchange. As of December 31, 2021, recurring to the sale of securities measured at amortized cost is not considered necessary and is not expected in the short term.

(49) Relevant Events

a) Tax audit process – Costa Rican Tax Administration Fiscal Year 2017

As of December 31, 2021, Banco Nacional de Costa Rica is in a verification and investigation process by the National Large Taxpayer Audit Area of the Costa Rican Tax Administration, in order to perform a review of the income tax for fiscal year 2017.

This tax audit was notified through document DGCN-SF-PD-25-2021 on March 31, 2021 and is currently in a review process by the Tax Administration.

b) Deferred term operations

The country is undergoing a national emergency due to COVID-19. Therefore, the board of directors of BCCR approved the creation of a medium-term special credit facility for SUGEF-regulated financial intermediaries.

As of December 31, 2021, 2,807 loan operations were placed under this modality, applying a discount to the interest rate on the loans in colones in the amount of ₡164,647 million, reaching an average rate of the operations already processed of 6%. The remaining average maturity term is 12.6 years.

(Continued)

c) Law for Creation of the Deposit Guarantee Fund and of the Resolution Mechanisms of Financial Intermediaries

According to the *Law for Creation of the Deposit Guarantee Fund and of the Resolution Mechanisms of Financial Intermediaries* (Law No. 9816), a deposit guarantee fund is created whose purpose is to strengthen the financial safety network of the national financial system through the creation of the Deposit Guarantee Fund and Resolution Mechanisms of Regulated Financial Intermediaries.

From the publication of the Regulation of the management of the Deposit Guarantee Fund and other guarantee funds on Wednesday, February 3, 2021, and its entrance into effect three months later, SUGEF-regulated financial intermediaries should contribute with no more than 15% of the deposits guaranteed by the entity. That is an annual contribution that will be paid quarterly within ten business days after the end of each quarter.

As of December 31, 2021, the Bank recognizes in its financial statements the amount of ¢122,256,193,104 corresponding to the quarterly contribution.

(50) Reclassification of the loan portfolio in legal collection

As of December 31, 2021 and 2020, a portion of the loan portfolio in legal collection was reclassified to the past due loans account, in conformity with the chart of accounts of SUGEF Directive 30-18, as follows:

Loans must be transferred to this account when the entity has complied with its administrative collection proceedings and has filed the lawsuit that begins judicial collection.

In compliance with the foregoing, as of December 31, 2021, the amount of ¢81,671,053,225 was reclassified (2020: ¢84,108,448,022).

(51) Transition to International Financial Reporting Standards (IFRS)

On September 11, 2018, CONASSIF issued SUGEF Directive 30-18 *Regulation on Financial Information* (RFI), which seeks to regulate the application of IFRS and its interpretations (SIC and IFRIC) issued by the International Accounting Standards (IASB), considering prudential or regulatory accounting treatments, as well as the definition of a specific treatment or methodology when IFRS suggest two or more alternatives for application. Moreover, RFI establishes the content, preparation, referral, presentation, and publication of the financial statements of individual financial entities, groups and conglomerates regulated by the four superintendencies. RFI is effective from January 1, 2020, with some exceptions.

A summary of some of the main differences between the accounting regulations issued by CONASSIF and IFRS, as well as IFRS or Interpretations of the International Financial Reporting Interpretations Committee (IFRIC) yet to be adopted, is presented below:

a) IAS 21: The Effects of Changes in Foreign Exchange Rates

CONASSIF requires that the financial statements of regulated entities be presented in Costa Rican colones as the functional currency.

Additionally, regulated entities must use the reference sell exchange rate set by BCCR that prevails at the time that the operation to record the translation of the foreign currency into the official currency, 'the Costa Rican colon', is made.

At each month close, the corresponding reference exchange rate will be used as indicated in the paragraph above, effective at the last day of each month, for the recognition of the adjustment due to foreign exchange differences in the monetary items in foreign currency.

According to this Standard, in preparing the financial statements, each entity will determine its functional currency. The entity will translate the items in foreign currency into the functional currency and will report on the effects of this translation. As indicated above, CONASSIF determined that both the presentation of financial information and the accounting records of foreign currency transactions should be translated into colones, irrespective of the functional currency.

b) IAS 38: Intangible assets

The commercial banks listed in Article 1 of IRNBS (Law No. 1644) may present organization and installation expenses as an asset in the statement of financial position. However, those expenses must be fully amortized using 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.

c) IFRS 5: Non-current Assets Held for Sale and Discontinued Operations

This Standard establishes that entities shall measure non-current assets (or disposal groups) classified as held for sale at the lower of the carrying amount and fair value less cost to sell.

CONASSIF requires an allowance for impairment to be booked as one-forty-eighth of the value of the asset, until reaching 100% of its carrying amount.

During the term of 24 months from the date when the asset is awarded or received, the entity may request from the Superintendency an extension of 2 years to sell the asset. The Superintendency may deny the request for an extension (providing reasonable grounds) and require the creation of an allowance for 100% of the asset's carrying amount during the first 24 months. If an extension is provided, the allowance can be created over the term approved by the Superintendency.

d) <u>IFRS 9: Financial Instruments</u>

a) For application of IFRS 9, particularly the measurement of ECL, the prudential regulations issued by CONASSIF will be maintained for the loan portfolio, accounts receivable and stand-by credits granted, until this Standard is modified.

b) The application of the measurement of ECL on investment funds of the money market category, as provided under IFRS 9, required by Articles 3 and 18 of the RFI, will be effective on January 1, 2022.

c) Regulated entities should have policies and procedures in place to determine the amount of the suspension of the booking of the accrual of commissions and interest on loan operations. However, the accrual suspension term should not exceed 180 days.

e) <u>IFRS 37: Provisions, Contingent Liabilities and Contingent Assets</u>

Article 10 of IAS 12 *Income Taxes* and IFRIC 23 *Uncertainty over Income Tax Treatments*:

i. The provisions of Article 10 of IAS 12 *Income Taxes* and IFRIC 23 *Uncertainty over Income Tax Treatments* will be effective beginning January 1, 2019. on initial application of IFRIC 23, entities must apply the transition established in item (b) of paragraph B2 of that Interpretation.

ii. The amount of the provision for the tax treatments in dispute notified before December 31, 2018, corresponding to tax periods 2017 and previous periods, will be booked at the greater of the best estimate of the amount payable to the Tax Authorities regarding the notice of deficiency (principal, interest, and fines), according to IAS 12, and 50% of the principal from the correction of the self-assessment of the tax obligation.

The booking of the provision for tax treatments in dispute for the periods indicated in the paragraph above may be accounted for in any of the following ways:

a. Booking against profit or loss for the year, in monthly installments, using the straight-line method, no later than December 31, 2021, or

b. Booking a single adjustment to the opening balance of prior period retained earnings until reaching the provision amount. Adjustments derived from subsequent evaluations of the amounts in dispute will be treated as adjustments to allowances, for which IAS 8 *Accounting Policies, Changes in Accounting Estimates and Errors* will be applied.

c. If the provision amount is greater than the opening balance of prior-period retained earnings, the adjustment will be attributed first to the opening balance of prior-period retained earnings, and for complementing, the indications of item a. will be followed.

On January 31, 2019 at the latest, the entity, with tax treatments in dispute for the years indicated in this provision, should report with the respective superintendency the method (a), (b) or (c) above, based on SUGEF Directive 30-18, that will be used until the resolution or settlement of the tax obligation.

(Continued)

(52) Disclosure of economic impact of departure from IFRS

Since the basis of accounting used by the Bank's management described in Note 2 differs from IFRS, discrepancies may arise related to certain account balances.

The Bank's management has chosen not to determine the economic impact of those differences since it considers such determination impractical.