

*Information disclosed in the report is prepared in accordance with the Financial and Capital Market Commission's regulations No. 145 "Regulations on Preparation of Public Quarterly Reports of Credit Institutions".*

### **Financial and operating results in the nine month period ended 30 September 2009**

Since 8 November 2008, when the Latvian state became the majority shareholder in *Parex banka*, the bank's operations have been substantially improved: the deposit volume has been stabilised, liquidity indicators have been improved, new customers have been attracted, and innovative products have been developed. Stabilization was also acknowledged by the rating agency Moody's upgrade of the long-term rating outlook from negative to stable on 30 July 2009.

Key elements in improving the *Bank's* financial indicators include a successful agreement on the restructuring of the *Bank's* syndicated loans in March of this year, as well as the involvement of the European Bank for Reconstruction and Development in the shareholder structure of the *Bank*, thus ensuring additional stability and growth prospects for the *Bank*.

This year has demonstrated our customer loyalty to the bank – evidenced by the deposit volumes as well as improvements in the *Bank's* liquidity indicator – at the end of October 2009 it stood at 42%. Moreover, this year the *Bank* has attracted a significant number of new customers, and the stability of financial indicators provide a favourable environment for attraction of strategic investor.

Major work has also been devoted to organizing the *Bank's* business and dividing it into three major directions – retail services, corporate services, and private capital management, identifying priorities for development in each of three areas. A restructuring plan of the *Bank* has been developed and submitted to the European Commission.

The *Bank* has worked successfully on attracting new clients and developing new products. During the course of the year, the *Bank* has developed and offered to customers several new deposit products, including the FLEX deposit. It is a term deposit denominated in lats with the possibility of converting the currency of the deposit unlimited number of times during the term of the deposit. The 3D savings account allows companies to plan their cash flow, while the EXPRESS term deposit has a fixed interest rate and allows the depositor to receive the earned interest at the beginning of the term.

In 2009, the *Bank* was continued to be supported by the government through rolling over the maturities of the liquidity facilities provided. The *Bank* in the nine month period ended 30 September 2009 has paid 31,4 million lats in interest to the State Treasury and the SJSC "Privatizācijas Aģentūra".

The *Bank* and *Group* closed 9 month period ended 30 September 2009 with net loss of 76,9 and 85,3 million lats, respectively. The results were substantially influenced by impairment charges of 75,0 and 81,8 million lats, respectively.

As at 30 September 2009, the *Bank's* and *Group's* loan portfolio was 1,54 and 1,76 billion lats, deposits accounted for 1,62 and 1,76 billion lats and total assets stood at 2,67 and 2,79 billion lats. The amount of capital and reserves at the end of September 2009 reached 160,5 and 154,0 million lats, respectively.

A wide scope of activities has been done during the course of the year to optimise expenditures. Administrative costs have been slashed significantly – personnel costs have been reduced by 30%, travel expenses by 93%, advertising, marketing and representation costs by 85%, transport costs by 68%, office expenses by 61%, and communications expenditures by 28%.

As a part of the work on the *Bank's* asset quality improvement, on 29 September 2009 the *Bank* established a subsidiary company SIA "NIF", which in October 2009 set up three subsidiary companies - SIA "NIF Dzīvojamie Īpašumi", SIA "NIF Komerģipāšumi" and SIA "NIF Zemes Īpašumi". The main goal of the established subsidiaries will be the effective management of the repossessed assets to ensure maximum return.

### **Significant events after the end of the reporting period**

On 29 October 2009 the *Bank's* capital was increased by 24,25 million lats. The increase was carried out by the largest shareholder of the *Bank* SJSC "Privatizācijas Aģentūra" by purchase of a corresponding amount of non-voting shares.

*The report has been approved by the Management Board of the Bank on 10 November 2009. More detailed information on the financial results of the Bank and the Group for 2008 are available in the audited reports published on Bank's Internet site [www.parex.lv](http://www.parex.lv)*

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**BALANCE SHEETS AS AT 30 SEPTEMBER 2009 AND 31 DECEMBER 2008**

LVL 000's

	Reporting period	Preceding reporting year	Reporting period	Preceding reporting year
	<i>Unaudited</i> Group	<i>Audited*</i> Group	<i>Unaudited</i> Bank	<i>Audited*</i> Bank
Cash and demand deposits with central banks	195 654	116 350	177 182	95 179
Demand deposits with credit institutions	163 712	94 444	158 549	114 247
Financial assets held for trading	5 655	25 918	5 710	25 553
Financial assets designated at fair value through profit and loss	2 729	1 629	-	-
Available-for-sale financial assets	125 914	158 691	110 900	153 722
<i>Loans and receivables to customers:</i>				
Loans to credit institutions	14 812	180 280	158 715	384 438
Loans to companies and private individuals	1 763 008	2 036 001	1 537 603	1 744 871
Held-to-maturity investments	373 472	758 546	391 405	797 989
Prepayments and accrued income	2 982	3 530	1 963	2 735
Fixed assets	55 474	60 492	14 428	20 238
Intangible assets	3 451	4 048	592	782
Investments in subsidiaries	-	-	59 906	51 442
Investment property	459	-	-	-
Income tax assets	34 097	20 346	29 640	17 345
Other assets	43 756	23 528	19 120	9 498
<b>Total assets</b>	<b>2 785 175</b>	<b>3 483 803</b>	<b>2 665 713</b>	<b>3 418 039</b>

Due to central banks	263 286	635 238	263 286	635 238
Demand liabilities to credit institutions	4 402	5 805	9 312	76 656
Financial liabilities held for trading	1 632	9 509	1 624	9 670
Financial liabilities designated at fair value through profit and loss	598	314	-	-
<i>Financial liabilities measured at amortised cost:</i>				
Loans from credit institutions	384 759	548 578	396 426	549 546
Deposits from customers	1 756 602	2 022 994	1 623 989	1 901 886
Issued debt securities	88 778	88 982	88 952	88 712
Subordinated liabilities	103 784	52 957	103 791	52 960
Other financial liabilities	4 197	2 341	-	-
Accrued expenses and deferred income	6 765	7 653	5 822	6 412
Income tax liabilities	781	787	-	-
Other liabilities	15 551	29 574	11 979	19 471
<b>Total liabilities</b>	<b>2 631 135</b>	<b>3 404 732</b>	<b>2 505 181</b>	<b>3 340 551</b>
Shareholders' equity	154 040	79 071	160 532	77 488
<b>Total liabilities and shareholders' equity</b>	<b>2 785 175</b>	<b>3 483 803</b>	<b>2 665 713</b>	<b>3 418 039</b>

<b>Memorandum items</b>				
Contingent liabilities	9 894	57 843	14 512	52 739
Financial commitments	135 121	179 632	152 594	269 518

\* Auditors: SIA „Ernst & Young Baltic”

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**STATEMENTS OF INCOME**  
**FOR 9 MONTHS PERIOD ENDED 30 SEPTEMBER 2009 AND 30 SEPTEMBER 2008**

*LVL 000's*

	Reporting period	Respective period of the preceding reporting year	Reporting period	Respective period of the preceding reporting year
	<i>Unaudited</i> Group	<i>Unaudited</i> Group	<i>Unaudited</i> Bank	<i>Unaudited</i> Bank
Interest income	139 846	172 191	123 947	152 950
Interest expense	(112 311)	(99 692)	(109 156)	(94 324)
Dividends received	71	315	71	313
Commission and fee income	21 367	34 887	16 479	28 226
Commission and fee expense	(6 244)	(8 300)	(5 059)	(8 189)
Net gain/ (loss) on available for sale financial assets and financial liabilities	(548)	(2 974)	(523)	(2 971)
Net gain/ (loss) on financial assets or financial liabilities designated at fair value through profit and loss	45	(51)	-	-
Net gain/ (loss) on held for trading financial assets and financial liabilities	3 968	(6 871)	3 875	(6 450)
Gain/ (loss) from foreign exchange trading and revaluation of open positions	1 140	11 092	1 037	9 689
Net gain/ (loss) on disposal of non-current assets held for sale	(2 293)	-	-	-
Other income	8 089	8 412	5 086	4 226
Other expense	(4 716)	(1 298)	(4 213)	(597)
Administrative expense	(55 544)	(77 245)	(38 779)	(57 975)
Amortisation and depreciation charge	(8 395)	(6 684)	(6 290)	(5 286)
Impairment charge and reversals, net	(81 793)	(8 825)	(75 029)	(6 085)
Corporate income tax	12 034	(1 775)	11 704	(1 122)
<b>(Loss)/ profit for the reporting period</b>	<b>(85 284)</b>	<b>13 182</b>	<b>(76 850)</b>	<b>12 405</b>

**PERFORMANCE RATIOS OF THE GROUP AND THE BANK**

	Reporting period	Respective period of the preceding reporting year	Reporting period	Respective period of the preceding reporting year
	Group	Group	Bank	Bank
Return on equity (ROE) (%)*	(97,56)	7,95	(86,10)	7,59
Return on assets (ROA) (%)*	(3,63)	0,52	(3,37)	0,53

\* Average value is calculated as the arithmetic mean of the balance sheet assets or residual capital and reserves at the beginning of the reporting period and at the end of the reporting period.

**RATINGS ASSIGNED BY RATING AGENCIES**

	Long-term rating	Short-term rating	Financial strength rating	Support rating	Rating's outlook
Moody's Investors Service	B2	Not Prime	E	-	Stable
Fitch	RD	RD	F	5	*

\* Outlook for this rating is not assigned.

Detailed information about ratings can be found on the web sites of the rating agencies: [www.moodys.com](http://www.moodys.com); [www.fitchratings.com](http://www.fitchratings.com)

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**CONSOLIDATION GROUP**

No.	Name of company	Registration number	Registration address	Country of domicile	Company type*	% of total paid-in share capital	% of total voting rights	Basis for inclusion in the group**
1	AS "Parex banka"	LV-40003074590	Latvia, Riga LV-1010, Republikas laukums 2A	LV	BNK	100	100	MAS
2	IPAS "Parex Asset Management"	LV-40003577500	Latvia, Riga LV-1010, Republikas laukums 2A	LV	IPS	100	100	MS
3	Regalite Holdings Limited	CY-HE93438	Cyprus, Nicosia 1075, 58 Arch. Makarios 3 Avenue, Iris Tower, 6th floor, office 602	CY	PLS	100	100	MS
4	AB "Parex bankas"	LT-112021619	Lithuania, Vilnius LT-03107, K. Kalinausko 13	LT	BNK	100	100	MS
5	SIA "Parex Express Kredīts"	LV-40003238125	Latvia, Riga LV-1010, K.Valdemāra 8	LV	CFI	100	100	MS
6	AS "Parex atklātais pensiju fonds"	LV-40003397312	Latvia, Riga LV-1010, Republikas laukums 2A	LV	PFO	100	100	MS
7	AAS "Parex Dzīvība"	LV-40003786859	Latvia, Riga LV-1010, Republikas laukums 2A	LV	APS	100	100	MMS
8	OU "Parex Leasing & Factoring"	EE-10925733	Estonia, Tallinn 10119, Roosikrantsi 2	EE	LIZ	100	100	MS
9	ZAO "Parex Asset Management"	RU-1037706024872	Russia, Moscow 119049, Donskaja 4 - 2	RU	IBS	100	100	MMS
10	OOO "Parex Asset Management Ukraina"	UA-32984601	Ukraine, Kiev 01034, Glibocicka 17	UA	IBS	100	100	MMS
11	SIA "E & P Baltic Properties"	LV-40003754637	Latvia, Riga LV-1010, Republikas laukums 2A	LV	IPS	50	50	MMS
12	UAB "Parex faktoringas ir lizingas"	LT-126233315	Lithuania, Vilnius LT03107, K.Kalinausko 13	LT	LIZ	100	100	MMS
13	UAB "Parex investiciju valdymas"	LT-111829843	Lithuania, Vilnius LT01109, Gyneju 16	LT	IBS	100	100	MMS
14	AP Anlage & Privatbank AG	CH-130.0.007.738-0	Switzerland, Freienbach 8807, Kantonsstrase 1	CH	BNK	100	100	MS
15	OOO "Parex Leasing and Factoring"	AZ-1105-T10-3749	Azerbaijan, Baku AZ1065, Dz.Dzabbarli 44, "Caspian Plaza"	AZ	LIZ	100	100	MS
16	OOO "Ekspress Lizing"	RU-1037867006726	Russia, St. Petersburg 192019, Sedova 11, liter A	RU	LIZ	100	100	MS
17	OOO "Laska Lizing"	UA-33104543	Ukraine, Kiev 03150, Dimitrova 5	UA	LIZ	100	100	MS
18	OOO "Parex Leasing"	RU-1047796715603	Russia, Moscow 125047, Čajanova 10 - 1	RU	LIZ	100	100	MS
19	IOOO "Pareks Lizing"	BY-190567618	Belarus, Minsk 220007, Aerodromnaja 125 - 1	BY	LIZ	100	100	MS

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No.	Name of company	Registration number	Registration address	Country of domicile	Company type*	% of total paid-in share capital	% of total voting rights	Basis for inclusion in the group**
20	OOO "Extroleasing"	RU-1027739537220	Russia, Moscow 111116, Energeticheskaja 3	RU	LIZ	100	100	MS
21	Calenia Investments Limited	CY-HE156501	Cyprus, Nicosia 1075, 58 Arch. Makarios 3 Avenue, Iris Tower, 6th floor, office 602	CY	PLS	100	100	MS
22	SIA "Parex Līzings un faktoringš"	LV-50003760921	Latvia, Riga LV-1010, Republikas laukums 2A	LV	LIZ	100	100	MS
23	SIA "Rīgas Pirmā Garāža"	LV-40003397543	Latvia, Riga LV-1010, Republikas laukums 2A	LV	PLS	100	100	MS
24	SIA "Parex Private Banking"	LV-40003103438	Latvia, Riga LV-1050, Smilšu 7	LV	PLS	100	100	MS
25	OOO "Extrocredit"	RU-1067746758518	Russia, Moscow 111116, Energeticheskaja 3	RU	CFI	99	99	MMS
26	LLC "Parex Leasing and Factoring"	GE-205224461	Georgia, Tbilisi, Kazbegi avenue 44	GE	LIZ	100	100	MS
27	SIA "RPG interjers"	LV-40103157899	Latvia, Riga LV-1010, Republikas laukums 1	LV	PLS	100	100	MMS
28	SIA "PR Speciālie projekti"	LV-40103195231	Latvia, Riga LV-1010, Republikas laukums 2A	LV	PLS	100	100	MMS
29	OOO "Parex Investments Ukraine"	UA-35726203	Ukraine, Kiev 03150, Gorkovo 172	UA	IBS	100	100	MMS
30	OAO Parex Ukrainian Equity Fund	UA-10681020000023247	Ukraine, Kiev 03150, Gorkovo 172	UA	IBS	100	100	MMS
31	SIA "NIF"	LV-40103250571	Latvia, Riga LV-1010, Republikas laukums 2A	LV	PLS	100	100	MS

\*BNK – bank, IBS – investment brokerage company, IPS – investment management company, PFO – pension fund, CFI – other financial institution, LIZ – leasing company, PLS – company providing various support services, APS – insurance company.

\*\* MS – subsidiary company, MMS – subsidiary of the subsidiary company, KC – joint venture, MAS – parent company.

**INFORMATION ABOUT PAREX BANKA'S BRANCHES**

As at 30 September 2009 the Bank was operating a total of 24 branches, including 4 foreign branches, 3 small client service centres, 50 mid-size client service centres and 5 representative offices.

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**ISSUED SHARE CAPITAL AS AT 30 SEPTEMBER 2009**

Shareholders	Nominal value (LVL)	Number of shares	Paid-in share capital (LVL)	Voting rights	Paid-in share capital (%)
SJSC "Privatizācijas Aģentūra"	1	144 670 791	144 670 791	144 470 791	70,30%
European Bank for Reconstruction and Development	1	51 444 325	51 444 325	51 444 325	25,00%
Other	1	9 662 179	9 662 179	5 468 323	4,70%
<b>Total</b>		<b>205 777 295</b>	<b>205 777 295</b>	<b>201 383 439</b>	<b>100%</b>

**MANAGEMENT OF THE BANK AS AT 30 SEPTEMBER 2009**

***Council of the Bank***

<u>Name</u>	<u>Position</u>
Andžs Ūbelis	Chairman of the Council
Michael Joseph Bourke	Deputy chairman of the Council
Laurence Phillips Adams	Member of the Council
Kaspars Āboliņš	Member of the Council
Juris Vaskāns	Member of the Council

***Management of the Bank***

<u>Name</u>	<u>Position</u>
Nils Melngailis	President; Chairman of the Management Board, p.p.
Guntis Bejavskis	Member of the Management Board, p.p.
Roberts Stugiņš	Member of the Management Board
Vladimirs Ivanovs	Member of the Management Board
Valters Ābele	Member of the Management Board

Since 29 June 2009 the EBRD is represented in Parex banka's Supervisory Council. A new Supervisory Council of Parex banka was elected during the annual General meeting of the Bank's Shareholders. The following members were elected to Parex banka's Council – Andžs Ūbelis, Michael J. Bourke, Laurence Phillips Adams (EBRD nominee), Kaspars Āboliņš and Carl Hakan Kallaker. Due to Carl Hakan Kallaker leaving his duties, the rest of the previous Council was reappointed on 28 August 2009 and Juris Vaskāns was appointed as the new member of the Council.

## **RISK MANAGEMENT**

Risk management principles are set out in Group's Risk and Capital Management Policy. The Group adheres to the following key risk management principles:

- The Group aims to ensure an acceptable risk level in all operations. Risks are always assessed in relation to the expected return. Risk exposures that are not acceptable for the Group are avoided, limited or hedged;
- The Group does not assume high or uncontrollable risks irrespective of the return they provide. Risks should be diversified and those risks that are quantifiable should be limited or hedged;
- The Group pursues prudent risk management policy, that is aligned with the Group' business and ensures effective total risk mitigation;
- Risk management is based on awareness of each and every Group's employee about the nature of transactions he/she carries out and related risks;
- Risk limit system and strict controls are essential risk management elements. Control of risk level and compliance with limits is ensured by structured risk limit systems for all material risks;
- The Group aims to ensure low risk exposure, diversified asset portfolio, limited risks in financial markets and low level of operational risk.

Risk management is an essential element of the Group's management process. Risk management within the Group is controlled by independent units - Risk and Compliance Sector.

The Group is exposed to the following main risks: credit risk, market risk, interest rate risk, liquidity risk, currency risk and operational risk. The Group has approved risk management policies for each of these risks, which are briefly summarised below.

### ***Credit risk***

Credit risk is the risk that the Group will incur a loss from debtor's non-performance or default. The group is exposed to credit risk in to its lending, investing and trading activities, as well as in respect to the guarantees issued to third parties and other off-balance sheet commitments to third parties.

Credit risk management is based on adequate risk assessment and decision-making. For material risks, risk analysis is conducted by independent units of Risk and Compliance Sector. The analysis of credit risk comprises evaluation of customer's creditworthiness and collateral and its liquidity. The analysis of creditworthiness of a legal entity includes analysis of the industry, the company, and its current and forecasted financial position. The analysis of creditworthiness of an individual includes the analysis of the customer's credit history, income and debt-to-income ratio analysis, as well as the analysis of social and demographic factors. In the event of material risks, lending decision is made by the Credit Committee, and further reviewed by the Bank's Management Board.

After the loan is issued, customer's financial position is monitored on a regular basis in order to timely identify potential credit losses.

To limit its credit risk, the Group has set the following concentration limits: individual counterparty limit, limit for group of mutually related customers, limit for large risk exposures, limit for the Group's related parties, an industry limit, limit by customer type and loan product. A number of limits were breached in 1<sup>st</sup> half of 2009 due to insufficient capital level and restricted Bank financing for leasing companies. Limits breached included individual counterparty limit, limit for group of mutually related customers, limit for large risk exposures (for the Bank) and industry limit, limit by customer type and type of collateral (for leasing subsidiaries). As at the date of approval of this report the relevant limits set for the Bank were complied with.

The Group reviews its loan portfolio on a regular basis to assess its quality and concentrations, as well as to evaluate the portfolio trends.

Credit risk identification, monitoring and reporting is the responsibility of Risk and Compliance Sector.

### ***Market risk***

Market risk is the risk that the Group will incur a loss as a result of the mark-to-market revaluation of balance sheet and off-balance sheet items caused by changes in market values of financial instruments, commodities and commodity derivatives due to changes in foreign exchange rates, interest rates and other factors.

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Position risk of financial instruments is assessed and limits are set by the Financial Market and Counterparty Committee (FMCC). The decisions of FMCC are approved by the Bank's Management Board. Market risk is managed by the Group's business units and subsidiaries which can accept market risk in line with the set limits and investment restrictions of the respective portfolio. Market risk is measured, monitored and risk levels are reported by Risk and Compliance Sector.

To assess the position risk, scenario analysis is applied. Scenario analysis is based on historic data and price changes of various financial instruments in different low probability high impact scenarios. For example, a flight-to-quality scenario assumes that investors move their capital from riskier investments towards safer investments (for instance, U.S. or other AAA-rated sovereign bonds). To manage market risk, the Group sets individual limits to issuers and financial instruments, as well as products exposed to market risk.

**Equity price risk**

Equity price risk is the risk that the Group will incur a loss due to changes in equity prices. Equity price risk is assessed and decisions on limits set are made by the Financial Market and Counterparty Committee. Further the decisions so made are approved by the Bank's Management Board.

**Interest rate risk**

Interest rate risk is related to the negative impact of interest rate changes on the Group's income and economic value.

Interest rate risk management in the Group is carried out in accordance with the Group's Interest rate Risk Management Policy. Interest rate risk is assessed and decisions are made by Assets and Liabilities Management Committee (ALCO). The decisions of ALCO are approved by the Bank's Management Board. ALCO sets the acceptable interest rate risk level and the Group's internal limit system, monitors the compliance with the approved limits and use of the instruments for the management of interest rate risk. Interest rate risk measurement and management is the responsibility of Treasury Sector, while risk reporting is the responsibility of Risk and Compliance Sector.

The Group manages interest rate risk by using the gap analysis of the risk sensitive assets and liabilities, duration analysis and sensitivity analysis of assets and liabilities as well as stress testing of interest rate risk. Based on the market analysis and the Group's financing structure, ALCO sets customer deposit interest rates. During the period when restrictions are imposed on the Bank's activities, these functions are carried out by the Bank's Management Board. Partially, the Group mitigates interest rate risk using derivatives.

**Liquidity risk**

Liquidity risk is the risk that the Group will be unable to meet its legal payment obligations. The purpose of liquidity risk management is to ensure the availability of liquid assets sufficient to meet potential obligations.

The Group manages its liquidity risk in accordance with the Group's Liquidity Risk Management Policy. Liquidity risk is assessed and decisions are made by ALCO. The decisions of ALCO are approved by the Bank's Management Board. ALCO sets the acceptable liquidity risk level, the Group's internal limit system and defines instruments for the management of liquidity risk, as well as monitors the compliance with the set limits. Liquidity risk management is the responsibility of the Treasury Sector, while risk measuring, monitoring and reporting is within the responsibility of the Risk and Compliance Sector.

Liquidity risk is assessed and related decisions are made by the Bank's Management Board. Daily liquidity management is ensured by the Treasury Sector in collaboration with Finance department. However the main source of liquidity is the funding provided by the State Treasury. By persistently improving the liquidity situation, the Bank as of July is in compliance with liquidity ratio requirements. Also starting from period ended in August the Bank meets mandatory reserve requirements in the Bank of Latvia.

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**Currency risk**

Currency risk is a risk of loss arising from fluctuations in currency exchange rates.

Currency risk management in the Group is carried out in accordance with the Group's Currency Risk Management Policy. Currency risk is assessed and decisions on limits set are made by the Financial Market and Counterparty Committee (FMCC). The decisions of FMCC are approved by the Bank's Management Board. FMCC defines the acceptable currency risk level and the Group's internal limit system, as well as monitors compliance with these limits.

Day-to-day currency risk management is the responsibility of Treasury Sector, while risk monitoring and reporting is the responsibility of Risk and Compliance Sector. The Group has set a limit for open currency positions in each currency at 10% of its equity, and the limit for the total open currency position at 20% of its equity. The limits are equal to the requirements by Latvian legislation. To assess currency risk, the Group also uses scenario analysis.

As at the date of approval of this report, due to limited access to currency risk mitigation instruments, the Bank and Group was not able to comply with the limit for the total open currency position, as well as for the single open currency positions in EUR. The full compliance will be restored, once the Bank is able to operate as before in the financial markets and re-opens the limits with currency dealers.

**Operational risk**

The Group defines operational risk as the risk of losses resulting from processes that are deficient or non-compliant with requirements of external and internal regulations, losses resulting from actions of employees and system malfunctioning, as well as losses resulting from actions of third parties or from other external conditions, including legal risk (risk of penalty fees, sanctions applied by external institutions, losses resulting from litigation and other similar events), but excluding strategic risk and reputation risk. The Group further divides operational risk into the following categories: personnel risk, process risk, IT and systems risk, external risk.

The Group does not accept operational risks with potential impact exceeding 10% of the Group's net annual revenues, as well as unmanageable risks or risks with unquantifiable impact, irrespective of the financial gains this could bring (i.e., the Group does not perform business activities incurring such operational risks).

The Group applies following approaches for operational risk management:

- Self-assessment of operational risk – the business-owners of the products and processes perform identification and evaluation of potential operational risk events, assessment of the existing control systems and the analysis of the required risk mitigation measures using self-assessment questionnaires and brainstorming sessions with the experts of the respective process;
- Defining operational risk indicators – use of statistical, financial and other indicators that reflect the level of various operational risk types and its changes within the Group;
- Defining the limits of the acceptable losses;
- Operational risk measurement by recording and analysing operational risk events, the extent of the respective damage incurred, causes and other related information (data base of operational risk losses and incidents);
- “Four-eye-principle” and segregation of duties;
- Business continuity planning;
- Risk assessment within product development;
- Insurance;
- Investments in appropriate data processing and information protection technologies.