

AS „Parex banka”
Public financial report for the 3rd quarter of 2009

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 Komerģcipašumi" 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

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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 |
| Total assets | 2 785 175 | 3 483 803 | 2 665 713 | 3 418 039 |

| | | | | |
|--|------------------|------------------|------------------|------------------|
| 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 |
| Total liabilities | 2 631 135 | 3 404 732 | 2 505 181 | 3 340 551 |
| Shareholders' equity | 154 040 | 79 071 | 160 532 | 77 488 |
| Total liabilities and shareholders' equity | 2 785 175 | 3 483 803 | 2 665 713 | 3 418 039 |

| Memorandum items | | | | |
|-------------------------|---------|---------|---------|---------|
| 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) |
| (Loss)/ profit for the reporting period | (85 284) | 13 182 | (76 850) | 12 405 |

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; 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% |
| Total | | 205 777 295 | 205 777 295 | 201 383 439 | 100% |

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 1st 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.