OTP Bank Plc.

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OTP GROUP

Risk management objectives and policies

Traditionally, OTP Bank has been characterized by conservative risk assumption. Its fundamental objective is to implement its strategic plan through maintaining the equilibrium between yields and risks. In order to be able to do so, it has established an independent risk management organizational unit and a uniform and consistent risk management system. The Bank operates a risk management process, which guarantees that the Bank complies, at all times, with the Basel accords, the applicable statutory regulations and supervisory authority requirements in all of the countries where the Bank operates, and at a group level as well.

The Bank has prepared a Risk Management Strategy, which covers all major types of risks (credit, operational, market and liquidity risks) that arise in connection with the banking business.

The independent risk management organizational unit performs the following:

- In order to identify potential risks, it analyses the Bank's activities, identifies the major risk factors to which these activities and the positions generated by them are exposed, and indicates the correlations between these positions.
- In order to measure risks, it collects historical data on the major risk factors, the losses stemming from them and the variables that can predict them.
- Monitors the results of the risk measures continuously, and prepares regular and up-to-the minute reports on them in a transparent manner for the various operative and executive levels.

In order to manage risks each organizational unit applies risk mitigation techniques (limits, securities, hedging transactions, control points embedded in processes and risk transfers).

The Bank strictly regulates the method of risk management and ensures that it is uniformly applied at a group level.

In its regulations on risk mitigation and the use of credit risk collateral, the Bank determines:

- the risk management process and methods, including decision-making powers and tasks linked to risk assumption as well as the requirements for the control of risk assumption;
- the types of eligible collateral in connection with contracts entailing bank exposures and the conditions for their acceptance;
- the criteria for the appraisal of the financial position and future solvency of current and future debtors, internal regulations related to debtor rating, and the manner in which the findings of the rating procedure are used.

The Bank's risk management strategy is to realize benefit from exchange rate and yield curve movements, by matching legal requirements, taking the risk exposure the loss from which does not damage profitability and operation safety of the Group. Aim of market risk management is to restrict potential loss arising from unfavorable exchange rate and/or yield curve movements.

- Treasury is responsible for market risk management and keeping risk within the frames approved by the Board.
- Continuous monitoring of market risk exposure, its reporting to the management, and development of risk measurement methods belong to organizational unit in separate division from Treasury.
- The Board approves the market risk measurement methodologies and the limit system which defines the acceptable risk.

The bank applies a risk management system for risk measuring and internal reporting based on but independent from the front office system so that it makes possible the efficient IT implementing of the developing risk measure techniques. All the concerned organizational areas have access to the risk management system but the competence varies with the different users. The internal risk management system complies with the EU directives and it is based on the methodological principles of the program checked by the Authority which is used for reporting risk exposure of the trading book.

Main principles of market risk management regulation:

- The bank is allowed to run market risks within the limits set by the Board of Directors. The bank can open ALM positions to hedge strategic risks appearing in the profit plan, but it needs the decision of the Board of Directors based on an ALCO proposal in every case. For the sake of the risk management, positions originating from other organizational units (for example home loan payments) are forwarded without delay to the Treasury in compliance with the internal reporting process.
- The bank divides the positions exposed to market risk into underlying risk factors (interest rates, foreign exchange rates, stock prices, volatility) and manages them in accordance with the positions calculated in the manner stated above.
- The bank continuously monitors the changes in the value of the positions originating from portfolios exposed to market risk, the value-at-risk of the portfolio and the changes in the values of the portfolio and it sets a limit system in connection with them. The bank attaches an internal action plan concerning limit breach to avoid losses incompatible with the risk-taking policy of the bank.
- Decision-makers of the bank get information about the bank's risk exposure and the regarding portfolios' profit-and-loss effects with pre-defined regularity.
- The profit-and-loss effect of ALM deals which intend to hedge the profit plan-driven market risk exposure and the profit-and-loss effect of the core portfolio in the plan are regularly reported to the management of the bank, so making the transparent control of hedging effectiveness possible.
- The bank allocates capital to the portfolios exposed to market risk in order to cover the possible losses.

Application of prudential requirements

List of fully consolidated entities under the rules of Consolidation Accounting (IFRS) and Consolidated Based Supervision:

Fully consolidated entities Q4 2009	Consolidation Accounting (IFRS)	Consolidated Based Supervision
OTP Bank Nyrt.	X	X
OTP Ingatlan Zrt.	X	X
Concordia-Info Zrt.	X	
Merkantil Bank Zrt.	X	X
Merkantil Car Zrt.	X	X
Merkantil Bérlet Kft.	X	X
OTP Lakástakarékpénztár Zrt.	X	X
Bank Center No. 1. Kft.	X	X
OTP Faktoring Vagyonkezelő Kft.	X	X
OTP Faktoring Zrt.	X	X
OTP Alapkezelő Zrt.	X	X
INGA KETTŐ Kft.	X	X
OTP Jelzálogbank Zrt.	X	X
OTP Pénztárszolgáltató Zrt.	X	
HIF Ltd.	X	X
OTP Banka Slovensko, a. s.	X	X
DSK Bank EAD	X	X
DSK Trans security EOOD	X	
DSK Tours EOOD	X	
POK DSK-Rodina AD	X	
NIMO 2002 Kft.	X	X
OTP Kártyagyártó Kft.	X	X
OTP Bank Romania S. A.	X	X
OTP Faktoring Slovensko, a.s.	X	X
DSK Asset Management EAD		X

Fully consolidated entities Q4 2009	Consolidation Accounting (IFRS)	Consolidated Based Supervision
OTP banka Hrvatska d.d.	X	X
OTP invest d.o.o.	X	X
OTP nekretnine d.o.o.	X	X
Merkantil Ingatlan Lízing Zrt.	X	X
OTP Ingatlan Befektetési Alapkezelő Zrt.		X
Air-Invest Kft.	X	X
DSK Leasing AD	X	X
DSK Auto Leasing EOOD	X	X
DSK Leasing Insurance EOOD	X	
SPLC-B Kft.	X	
SPLC-N Kft.	X	
SPLC-P Kft.	X	
SPLC-S Kft.	X	
SPLC-T1 Kft.	X	
SPLC Vagyonkezelő Kft.	X	X
OTP Lakáslízing Zrt.	X	X
OTP Életjáradék Ingatlanbefektető Zrt.	X	X
OTP Leasing d.d.	X	X
Projekt 1. Kft.	X	
OTP Bank JSC (Ukraine)	X	X
OAO OTP Bank (Russia)	X	X
OTP banka Srbija a.d.	X	X
OTP Leasing d.o.o. Novi Sad	X	X
OTP Investments d.o.o. Novi Sad	X	X
Megaform Inter OOO		X
AlyansReserv OOO		X
Invest Oil OOO		X
Crnogorska Komercijalna banka a.d.	X	X
Opus Security S.A.	X	X
OTP Immobilien Verwertung Gmbh.		X
OTP Leasing Romania IFN S.A.	X	X
Kratos nekretnine d.o.o. Zagreb	X	X
OTP Financing Cyprus	X	X
OTP Financing Netherlands B.V.	X	X
OTP Financing Solution B.V.	X	X
CJSC Donskoy Narodny Bank	X	X
Cresco d.o.o.		X
OTP Kereskedőház Kft.		X
OTP HOLDING LIMITED	X	X
Velvin Ventures Ltd.	X	X
OTP Rent d.o.o.	X	X
LLC OTP Leasing (Ukraine)	X	X
LLC AMC OTP Capitol (Ukraine)	X	X
OTP Asset Management SAI S.A.	X	X
Z plus d.o.o.	X	X
Monopost Kft.		X
Monicomp Kft.		X
OTP Mérnöki Szolgáltató Kft.		X
OTP Létesítményüzemeltető Kft.		X
OTP Factoring SRL	X	X
OTP Factoring Ukraine LLC	X	X

List of unconsolidated entities owned more than 20% of shares, under the rules of Consolidated Accounting (IFRS) and Consolidated Based Supervision:

List of unconsolidated entities, owned more than 20% of shares	
Consolidation Accounting	Consolidated Based Supervision
Alyans Reserv OOO	CIL Babér Kft.
CIL Babér Kft.	Company for Cash Services
Company for Cash Services	Concordia-Info Zrt.
CRESCO d.o.o.	D4 Tenant Kft.
D4 Tenant Kft.	Dokulog Kft.
Dokulog Kft.	Drustvo za upravljanje PIF-om Moneta
Drustvo za upravljanje PIF-om Moneta	DSK Bul-Projekt OOD
DSK Asset Management EAD	DSK Leasing Ins. EOOD
DSK Bul-Projekt OOD	DSK Tours EOOD
Gamayun Llc.	DSK Trans security EOOD
Gizella Projekt Ingatlanforgalmazó Kft.	Gamayun Llc.
Ingatlanbefektetési Projekt 7 Kft.	Gizella Projekt Ingatlanforgalmazó Kft.
Ingatlanforgalom Projekt 15. Kft.	Ingatlanbefektetési Projekt 7 Kft.
Ingatlanhasznosító Projekt 11 Kft	Ingatlanforgalom Projekt 15. Kft.
Ingatlanvagyon Projekt 14. Kft.	Ingatlanhasznosító Projekt 11 Kft
Invest Oil OOO	Ingatlanvagyon Projekt 14. Kft.
JN Parkolóház Kft.	JN Parkolóház Kft.
Kereskedelmi Projekt 10. Kft.	Kereskedelmi Projekt 10. Kft.
Kikötő Ingatlanforgalmazó Kft.	Kikötő Ingatlanforgalmazó Kft.
Kordon Llc.	Kordon Llc.
LLC Business Office	LLC Business Office
LLC Promfin	LLC Promfin
LLC Promstroyinvest	LLC Promstroyinvest
M8-2 Ingatlanhasznosító Kft.	M8-2 Ingatlanhasznosító Kft.
Megaform Inter OOO	MIN Holding Niš
MIN Holding Niš	Miskolci Diákotthon Kft.
Miskolci Diákotthon Kft.	Mlekara Han d.o.o.
Mlekara Han d.o.o.	Monirent Kft.
Monicomp Kft.	Naprijed d.d. (be in liquidation)
Monirent Kft.	Omnilog Kft.
Monopost Kft.	OOO OTP Travel
Naprijed d.d. (felsz. a.)	OTP Broker de Intermedieri Financiare SRL
Omnilog Kft.	OTP Buildings s.r.o.
OOO OTP Travel	OTP Consulting Romania SRL
OTP Broker de Intermedieri Financiare SRL	OTP Faktoring Fedezetkezelő Kft.
OTP Buildings s.r.o.	OTP Fedezetingatlan Kft.
OTP Consulting Romania SRL	OTP Hungaro-Projekt Kft.
OTP Faktoring Fedezetkezelő Kft.	OTP Ingatlan Bau Kft.
OTP Fedezetingatlan Kft.	OTP Nedvizhimost ZAO
OTP Hungaro-Projekt Kft.	OTP Pension Funds Administrator LLC
OTP Immobilien Verwertung Gmbh.	OTP Pénztárszolgáltató Zrt.
OTP Ingatlan Bau Kft.	OTP Real Slovensko s.r.o.
OTP Ingatlan Befektetési Alapkezelő Zrt.	OTP Travel Kft.
OTP Kereskedőház Kft.	Pet-Real Kft.
OTP Létesítményüzemeltető Kft.	POK DSK-Rodina AD
OTP Mérnöki Szolgáltató Kft.	Projekt 1. Ingatlan Kft.
OTP Nedvizhimost ZAO	Projekt 2003. Ingatlan Befektető és Fejlesztő Kft.
OTP Pension Funds Administrator LLC	Projekt 3. Ingatlanforglamazó és Kereskedelmi Kft.
OTP Real Slovensko s.r.o.	Projekt Ingatlanforgalmazó 9. Kft.
OTP Travel Kft.	Projekt Vagyonkezelési 13 Kft.
Pet-Real Kft.	Projekt-Ingatlan 8. Kft.
Projekt 2003. Ingatlan Befektető és Fejlesztő Kft.	PSF Llc.
Projekt 3. Ingatlanforglamazó és Kereskedelmi Kft.	Rácalmás Projekt Kft.
Projekt Ingatlanforgalmazó 9. Kft.	Rácalmási Területfejlesztő Kft.

List of unconsolidated entities, owned more than 20% of shares	
Consolidation Accounting	Consolidated Based Supervision
Projekt Vagyonkezelési 13 Kft.	Robinv S.A.
Projekt-Ingatlan 8. Kft.	Sasad-Beregszász Ingatlanforgalmazó Kft.
PSF Llc.	SC AS Tourism SRL
Rácalmás Projekt Kft.	SC OTP Fond de Pensii S.A.
Rácalmási Területfejlesztő Kft.	SPLC-B Kft.
Robinv S.A.	SPLC-C Kft.
Sasad-Beregszász Ingatlanforgalmazó Kft.	SPLC-N Kft.
SC AS Tourism SRL	SPLC-P Kft.
SC OTP Fond de Pensii S.A.	SPLC-S Kft.
SPLC-C Kft.	SPLC-T1 Kft.
Suzuki Pénzügyi Szolgáltató Zrt.	Suzuki Pénzügyi Szolgáltató Zrt.
Szalamandra Ingatlanforgalmazó Kft.	Szalamandra Ingatlanforgalmazó Kft.
Vagyonkezelő Projekt 12 Kft	Vagyonkezelő Projekt 12 Kft

The group of companies deducted from consolidated regulatory capital:

- The value of interests in other financial institutions, investment firms, insurance and reinsurance companies which deduct the regulatory capital: 428 million HUF.
- The ownership share value in the company which need not be included in the consolidation because of the Commission decision is zero.
- Deduction because of direct or indirect ownership share, calculated on net value, in a company to an extent exceeding fifty-one percent of the company's subscribed capital, with the exception of other financial institutions, investment enterprises, commodities brokers, organizations providing clearing or settlement services under the CMA, investment fund managers, exchange market operators, insurance and reinsurance companies, or associated companies: 7.033 million HUF.

Internal capital adequacy

The internal capital adequacy assessment process (ICAAP) aims to measure and ensure the disposability of the capital which is necessary to cover the material risks of OTP Group.

The internal capital adequacy assessment process assesses and defines the sufficient level of capital for the coverage of each risk type.

The ICAAP has to ensure the disposability of the sufficient capital by management information system and preparation of the necessary decisions.

The decisions related to the ICAAP process, and also the approval of the results, are made by Management Committee of OTP Bank.

The main principles of the ICAAP:

- The main aim of the internal capital adequacy assessment process is to measure the actual and the planned capital need.
- It is important to integrate the ICAAP to the decision making process of the Bank. We should ensure that the relevant management bodies are informed on the results of the ICAAP and are able to make the necessary capital management decisions.
- The ICAAP and the capital requirement of each risk type have to be reviewed and refreshed on a yearly basis.
- The capital requirement calculation is prepared in line with the Bank's business and risk strategy.
- The capital adequacy assessment process covers all relevant risk types.
- The assessment process should comply not just with the actual but also with the future circumstances.

Guarantee capital and regulatory capital requirements

The consolidated capital requirement calculation of OTP Group is based on HAS data.

OTP Group applied standardized capital calculation method regarding credit and market risk, basic indicator approach (BIA) and alternative standardized approach (ASA) regarding operational risk. OTP Group consolidated regulatory capital requirement as of end of December 2009 was 555 billion HUF, the amount of guarantee capital was 1 242 billion HUF. The consolidated capital adequacy ratio stood at 17.9%.

Consolidated capital requirement (million HUF)	Q4 2009
Capital requirement	**555 395**
Credit risk	457 589
Market risk	29 490
Operational risk	68 315

Consolidated regulatory capital[1] (million HUF)	Q4 2009
Regulatory capital	**1 242 426**
Tier1	1 016 983
Tier2	232 904
Additional capital	0
Deductions	-7 461

Capital requirement for credit and counterparty risk (million HUF)	Q4 2009
Standardized method capital requirement	**457 589**
Central governments or central banks	9 853
Regional governments or local authorities	28 339
Public sector entities	1 011
Multilateral Development Banks	19
Institutions	21 754
Corporate	162 294
Retail	120 470
Secured by real estate property	57 630
Past due items	26 780
Collective investment undertakings	478
Other items	28 959

[1] Positive components of Tier 1: Share capital, Capital reserve, Tied-up reserve, General reserve, Retained ernings, Change in equity of subsidiaries, Change because of consolidation, Minority interests, Balance sheet profit, General risk reserve; Core loan capital
Negative components of Tier 1: Treasury shares, Goodwill and other intangible assets
Positive components of Tier 2: Upper Tier 2, Lower Tier 2
Negative components of Tier 2: Difference resulting from the capital consolidation

OTP BANK

Calculation methods and approaches of impaired items and provisions

The Bank's provisioning policy is prudent and conservative.

In establishing the profit or loss for the reporting year, it is through accounting for impairment and raising provisions that foreseeable risks and potential losses are taken into consideration even if they become known between the end of the last reporting period and the balance sheet date. Impairment and provisions are both recognized, irrespective of whether the business year is closed with a profit or a loss.

For the debts outstanding at the rating cut-off date and the cut-off date for the business year and unpaid until the balance sheet date, impairment is recognized on the basis of available information; the amount of the recognized impairment is the difference between the book value of the outstanding debt and the expected amount of the recovered debt. (The following qualify as receivables: receivables from credit institutions and financial enterprises, loans, advance payments as well as items of receivable type recorded among accruals and deferrals of income.)

If the amount of the debt that is expected to be recovered exceeds the book value of the debt at the cut-off date for rating, the impairment recognized earlier will be reduced through reversal.

The Bank recognizes risk provision for off-balance sheet (pending, future) liabilities on the basis of their rating. If the rating process reveals that the amount of the risk provision exceeds the amount required on the basis of the rating, the excess amount of the risk provision is released. Risk provisions are used upon the termination of pending or certain (future) liabilities, or when losses arising from such liabilities are realized.

In its regulations entitled "Special valuation criteria", the Bank provides detailed regulations pertaining to the valuation and impairment recognition of, and provisioning for, outstanding debts, investments, assets received in return for receivables and recorded as inventories and off-balance sheet liabilities.

Low-amount outstanding debts are rated on the basis of group evaluation with a simplified method. An important parameter of the simplified rating procedure is payment delay.

The Bank determines the payment delay on the basis of the number of the calendar days without the client's fulfilment that pass without debt amortization from the due date of the principal repayment and/or the loan rate payment obligation specified in the assumption of risk contract to the cut-off date of the valuation.

The frequency and length of payment delay, as well as its growing trend increase the credit risk of the transaction and impair the quality of the risk assumption.

Outstanding debts subject to group evaluation are classified into five categories ("performing", "watch", "substandard", "doubtful" and "bad") during the rating process. A certain amount of provision is allocated to each rating category, and it is this percentage value on the basis of which impairment is recognized on all receivables in the same category.

Based on a case-by-case evaluation, outstanding debts not qualifying as 'low amount' are included in one of the following asset rating categories, which are associated with the following provisioning weight bands:

- performing 0%,
- watch 1-10%,
- substandard 11-30%,
- doubtful 31-70%,
- bad 71-100%.

Depending on the nature of the item, classification into asset rating categories is based on the joint deliberation of the following aspects:

- client and counterparty rating – financial situation, stability and income generation capability of the client or counterparty affected by the financial and investment service, and any changes in these factors;
- compliance with the repayment schedule (overdue days) – patterns of delay on principal and interest payment related to the amortization of the outstanding debt, regularly fulfilment of the payment obligation;

- status of restructured risk contract;
- sovereign risk and changes in the sovereign risk associated with the client (both political risk and transfer risk);
- value, marketability and availability of the securities pledged as collateral and any changes in them;
- resale-ability and marketability of the item (market demand and supply, achievable market prices, share in the issuer's equity in proportion to the size of the investment),
- future payment obligation, which qualifies as a loss originating from the item.

Probable future losses on the item are determined on a case-by-case basis, in consideration of the above aspects as applicable. The comparison of such probable future losses with the value of the collateral securing the item indicates the expected amount of losses determined on the basis of the value of the collateral, i.e. the required amount of provisions. If this amount is lower than the amount recognized on the item earlier, it has to be supplemented by the amount of the difference by recognizing a further amount of impairment, or if it is higher, it has to be reduced by the reversal of the existing amount of impairment. Classification into asset rating categories occurs on the basis of the expected amount of losses determined on the basis of the value of the collateral.

Investments (including assets received in return for receivables and recorded as inventories) and off-balance sheet liabilities are, in all cases, evaluated on a case-by-case basis.

In keeping with § 87 (2) of Act CXII of 1996 on Credit Institutions and Financial Enterprises, the Bank creates general risk provisions – up to a maximum of 1.25% of the risk-weighted exposure amounts (adjusted balance sheet total) – to cover any unforeseeable and indeterminable losses in connection with exposures.

General risk provisions can be used if losses are incurred when assets are sold, derecognized or written off as loan or investment losses, and when losses are realized due to off-balance sheet liabilities.

General risk provisions are used – in the amount of the losses – when losses are realized on a portion of the above assets or off-balance sheet liabilities that is uncovered by reserves.

Qualified exposures:

Qualified exposure and volume of provision (million HUF)	Qualified exposure on gross value (31.12.2009.)	Volume of provision / impairment (01.01.2009.)	Provision / impairment accounted	Provision / impairment released	Provision / impairment utilized	Exchange difference	Total change of provision / impairment	Volume of provision / impairment (31.12.2009.)
Loans to credit institutions, PBB loans	36 281	1 101	1 106	-1 227	0	0	-121	981
Loans to non-financial enterprises	172 361	19 326	51 068	-34 738	-6 222	137	10 246	29 572
Household loans	87 736	19 179	59 865	-30 031	-22 675	-421	6 738	25 917
Loans abroad	294 449	4 588	56 988	-26 728	-77	-506	29 677	34 265
Other loans	26 934	316	998	-509	-18	1	473	789

Countries	Qualified loans on gross value	Volume of provision / impairment	Qualified loans on net value
Hungary	323.312	57.258	266.053
the Netherlands	113.921	654	113.267
Cyprus	58.904	5.027	53.877
Montenegro	30.623	15.567	15.057
Bulgaria	24.382	735	23.647
Romania	18.006	2.969	15.037
Ukraine	12.096	2.586	9.509
Slovakia	9.226	320	8.906
Kazakhstan	5.642	1.128	4.514
Serbia	4.840	2.420	2.420
Seychelles	4.567	411	4.156
Croatia	3.390	313	3.077
United Kingdom	2.785	1.393	1.392
Georgia	2.257	23	2.234
Lithuania	1.896	95	1.801
Russia	813	536	276
Azerbaijan	564	6	559
Egypt	534	80	454
Germany	1	1	1
Other countries (gross value is less than 1 million HUF individually)	2	1	1
Total	**617.761**	**91.523**	**526.237**

Guarantee capital and regulatory capital requirements

The capital requirement calculation of OTP Bank is based on HAS and audited data.

OTP Bank applied standardized capital calculation method regarding credit and market risk, and alternative standardized approach (ASA) regarding the operational risk. OTP Bank regulatory capital requirement as of end of December 2009 was 308 billion HUF, the amount of regulatory capital was 626 billion HUF. The capital adequacy ratio stood at 16.24%.

OTP Bank capital requirement (million HUF)	Q4 2009
Capital requirement	**308 270**
Credit risk	260 665
Market risk	29 231
Operational risk	18 374

Regulatory capital[2] (million HUF)	Q4 2009
Regulatory capital	**625 936**
Tier1	691 064
Tier2	308 695
Additional capital	0
Deductions	-373 823

[2] Positive components of Tier 1: Share capital, Capital reserve, Tied-up reserve, General reserve, Retained ernings, Balance sheet profit, General risk reserve
Negative components of Tier 1: Treasury shares, Goodwill and other intangible assets
Positive components of Tier 2: Upper Tier 2, Lower Tier 2

Capital requirement for credit and counterparty risk Q4 2009 (million HUF)	Credit	Counterparty	Total
Standardized method capital requirement	**256 054**	**4 611**	**260 665**
Central governments or central banks	0	0	0
Regional governments or local authorities	22 621	7	22 628
Public sector entities	992	0	992
Multilateral Development Banks	0	19	19
Institutions	34 039	3 887	37 927
Corporate	140 921	697	141 617
Retail	33 556	0	33 556
Secured by real estate property	4 121	0	4 121
Past due items	8 293	0	8 293
Covered bonds	0	0	0
Collective investment undertakings	478	0	478
Other items	11 032	0	11 032

Exposures[3] broken down by exposure classes

Exposure amounts broken down by exposure classes - gross (million HUF)	Q4 2009
Gross exposure	**7 087 750**
Central governments or central banks	994 957
Regional governments or local authorities	368 391
Public sector entities	16 119
Multilateral Development Banks	1 213
Institutions	1 381 331
Corporate	2 198 293
Retail	798 411
Secured by real estate property	140 291
Past due items	151 690
Covered bonds	834 833
Collective investment undertakings	5 980
Other items	196 241

Exposure amounts broken down by exposure classes - net (million HUF)	Q4 2009
Net exposure	**6 928 923**
Central governments or central banks	994 957
Regional governments or local authorities	367 790
Public sector entities	16 117
Multilateral Development Banks	1 213
Institutions	1 374 953
Corporate	2 117 744
Retail	789 579
Secured by real estate property	138 487
Past due items	94 677
Covered bonds	834 833
Collective investment undertakings	5 980
Other items	192 593

Exposures[3] broken down by exposure classes and maturity

Exposures broken down by exposure classes and maturity (million HUF)	In 1 year	1 - 2,5 year	2,5 - 5 year	Over 5 year	Without maturity	Non allocated
Total	**3 024 932**	**1 502 375**	**810 332**	**1 466 754**	**207 075**	**76 282**
Central governments or central banks	669 374	97 525	104 249	123 678	0	131
Regional governments or local authorities	128 609	37 447	51 549	150 777	0	9
Public sector entities	3 946	4 340	2 754	3 526	0	1 553
Multilaterial Development Banks	0	1 213	0	0	0	0
Institutions	915 173	270 442	79 952	63 554	3 064	49 146
Corporate	600 177	644 841	355 569	594 661	0	3 045
Retail	446 587	74 158	96 852	98 360	75 215	7 239
Secured by real estate property	35 149	17 332	22 056	65 754	0	0
Past due items	84 052	9 046	9 475	49 117	0	0
Covered bond	83 598	346 032	87 876	317 327	0	0
Collective investment undertakings	0	0	0	0	5 980	0
Other items	58 266	0	0	0	122 816	15 159

[3] Exposures according to credit and counterparty risk excluding items are treated as negative components of capital

Exposures of foreign countries[4] broken down by exposure classes

Exposure of foreign countries - gross Q4 2009 (million HUF)										
Countries	Central governments or central banks	Regional governments or local authorities	Multilaterial Development Banks	Insitutions	Corporate	Retail	Secured by real estate property	Past due items	Other items	**Total**
Austria				52 954	20	5				**52 979**
Australia				77						**77**
Azerbaijan				576						**576**
Belgium				49 860	50					**49 910**
Bulgaria				58 151	72 667	1				**130 820**
Belize					9 404					**9 404**
Canada				46		39				**85**
Switzerland				37 559	4 183	6				**41 748**
Cyprus				3	515 457				2 238	**517 698**
Czech Republic				5 076	943					**6 019**
Germany				46 789		41		1		**46 831**
Denmark				491						**491**
Estonia				25						**25**
Egypt					534	1				**535**
Spain				3 712	63		32			**3 807**
France				54 854		2				**54 856**
United Kingdom			1 213	102 512		4		2 814		**106 543**
Georgia				2 272						**2 272**
Croatia				30 433	25 019	2		3 390		**58 844**
Ireland				52 494						**52 494**
Israel				25		1				**26**
Iraq						1				**1**
Iran						1				**1**
Iceland				30						**30**
Italy				1 845		2	16			**1 863**
Japan				2 996		1				**2 997**
Kazakstan				5 642						**5 642**
Latvia								1 896		**1 896**
Luxembourg				3 691	944	1				**4 636**
Montenegro				21 165	47 013	25		16 091		**84 294**
Mongolia						2				**2**
Malta				300	9 800	1				**10 101**
Nigeria						1				**1**
Netherlands				6 688	397 443	6				**404 137**
Norway				314						**314**
Poland				2 875		2				**2 877**
Portugal				77						**77**
Romania	1 273	572		68 641	34 969	5 636	9 723	15 655	851	**137 320**
Serbia				24 728	4 840					**29 568**
Russian Federation				158 400	24 205	2		813	20 247	**203 667**
Seychelles					4 567					**4 567**
Sweden				1 490		4				**1 494**
Slovenia						1				**1**
Slovakia				593	52 633	321		41		**53 587**
Turkey				19						**19**
Ukrain				18 711	61 652	36		3 699		**84 098**
United States				7 533	54	16				**7 604**
South Africa						1				**1**
Total	**1 273**	**572**	**1 213**	**823 648**	**1 266 460**	**6 162**	**9 771**	**44 400**	**23 336**	**2 176 835**

[4]Exposures according to credit and counterparty risk excluding items are treated as negative components of capital

Credit risk mitigation

Regulations on the valuation and management of securities contain (1) the aspects and factors that the Bank uses as a basis for collateral valuation depending on the type of the collateral and (2) the methods that the Bank uses in evaluating collateral. They lay down the procedures applicable when change occurs in the availability, value and enforceability of the collateral as well as the rules governing the frequency of regular and subsequent collateral valuation.

Collateral valuation covers all the lending, risk managing and legal activities that the Bank performs prior to the extension of a loan as well as during the term of the risk assumption in order to obtain information on the availability, value and enforceability of the collateral.

During the term of the contract containing the risk exposure the Bank regularly monitors and documents the fulfillment of the conditions set forth in the contract, including developments in the client's financial and economic position as well as changes in the availability, fair value and enforceability of the collateral and the securities.

In its lending activity the Bank uses the following types of eligible securities the most frequently: collateral deposit, lien, guarantee and suretyship.

Collaterals used in capital requirement calculation (Q4 2009):

Net exposure[5] covered by collaterals (million HUF)	State guarentee	Institution guarantee	Guarantee provided by others	Guarantee	Secured by real estate	Financial guarantee
Összesen	**73 309**	**375**	**51**	**73 735**	**145 810**	**66 490**
Regional governments or local authorities	1 477			1 477		14 852
Public sector entities						1 016
Institutions						697
Corporate	29 813	365		30 178		47 647
Retail	39 624	10		39 634		2 253
Secured by real estate property					138 487	
Past due items	2 395		51	2 446	7 323	25

Information about market and credit risk concentration

In order to avoid excessive dependency, the Bank manages the concentration risks of the portfolio by setting limits for sectors, countries, clients and counterparties at both bank and bank group levels.

In order to restrain the transfer of risk originating from a potential owner-business interest relationship between clients or relationships of business nature or collateral-related relationships, clients that qualify as a client group must be defined and client level concentration limits must be interpreted at a client-group level.

In order to support the recording and maintenance of client groups at a bank-group level, group-level regulations have been developed together with an IT system.

[5] Gross exposure less provisions (credit and counterparty)

Use of credit assessment by Export Credit Agencies

OTP Bank uses S&P, Moody's and Fitch credit assessment[6]. Exposures to central governments and central banks shall be assigned a risk weight in a credit assessment scale. Exposures to institutions shall be assigned a risk weight according to the credit quality step to central government.

Credit quality step (CQS) to which central government is assigned	1	2	3	4	5	6
Central governments and central banks risk weight	0%	20%	50%	100%	100%	150%
Institutions risk weight	20%	50%	100%	100%	100%	150%

Trading book

At the end of 2009 counterparty risk represented 4 611 million HUF

The capital requirement for market risk:

Capital requirement for market risk (million HUF)	Q4 2009
Total	**29 231**
Position risk	1 542
FX-rate risk	27 689

OTP Bank has not applied IRB method regarding the market risk since 28. November 2008.

Exposures in equities and interest risk rate positions not included in trading book

According to the Act on Accounting (Subsection (1) of Section 27 of Act C of 2000) those participations shall be shown under the financial investments which are kept for the purposes of gaining permanent income, or an influencing, directive or controlling option therein while the purpose for holding of participations included in the trading books is the short term exchange gain due to the price difference between the purchase and selling price.

According to the Investment Regulation of the OTP Plc. the long-term participations can be classify as it follows:

I. Strategic capital investments

- Group of OTP Bank
- Other strategic capital investments
    - Capital investments based on provisions of law
    - Capital investments for banking operation
    - Capital investments for banking business
    - Credit institution investments
    - Other strategic investments

II. Non strategic capital investments

- Investments planned to be sold for portfolio settlement or other purposes
- Investments under liquidation, dissolution and framework of bankruptcy
- Investments resulted from credit-capital conversion (forced investments)

[6] If more than two credit assessments are available from nominated ECAIs for a rated item, the two assessments generating the two lowest risk weights shall be referred to. If the two lowest risk weights are different, the higher risk weight shall be assigned.

According to the Accounting Policy of the OTP Bank Plc. the cost value (purchase value) of the investments representing participating interests shall mean as it follows:

- In the course of buying shares, participations, capital contributions the cost value shall be comprised the amount paid for it, or - in respect of acquisitions - decreased or increased by the goodwill or negative goodwill, as appropriate, if goodwill or negative goodwill is shown
- In the course of foundation or increase of capital the amount is recorded as combined value of contributions, as defined in the deed of foundation or its amendments, or in the general meeting or shareholders' or founders' resolution, to cover the subscribed capital, the balance between subscription or issue price and the face value, or the capital above and beyond the subscribed capital in the amount of paid up cash contributions and non-pecuniary contribution provided.

The shares and business shares of the companies which are included in the investment portfolio of OTP Bank's shall be classify according to the OTP Bank's actual regulations for the valuation and shall be adjusted based on the classification. Essentially, the probability and size of the expected losses of investment have to be determined under the classification.

Exposures in equity not included in trading book:

Exposures in equitis not included in trading book 31.12.2009	Currency	Gross value (million)		Exchange-traded
		Currency	HUF	
OTP Banka Slovensko a.s.	EUR	80	21 669	Yes
OTP Banka Srbija a.d. Novi Sad	RSD	7 454	21 094	Yes
MasterCard Inc.	USD	0	0	Yes
Merkantil Bank Zrt.	HUF	0	1 600	No
OTP LTP Zrt.	HUF	0	1 000	No
OTP Jelzálogbank Zrt.	HUF	0	27 000	No
OTP Faktoring Zrt.	HUF	0	225	No
OTP Lakáslízing Zrt.	HUF	0	241	No
GIRO Elszámolásforgalmi Zrt.	HUF	0	294	No
Garantiqua Hitalgarancia Zrt.	HUF	0	290	No
Budapesti Értéktőzsde Zrt.	HUF	0	123	No
OTP Pénztárszolgáltató Zrt.	HUF	0	2 620	No
OTP Alapkezelő Zrt.	HUF	0	1 653	No
OTP Ingatlan Befektetési Alapkezelő Zrt.	HUF	0	52	No
Kisvállalkozás-fejlesztő Pénzügyi Zrt.	HUF	0	50	No
OTP Életjáradék Zrt.	HUF	0	1 250	No
CJSC Donskoy Narodny Bank	RUB	201	1 244	No
DSK Bank AD	BGN	360	49 816	No
OTP Bank Romania S.A.	RON	470	30 031	No
OTP banka Hrvatska d.d.	HRK	1 202	44 642	No
OAO OTP Bank	RUB	5 240	32 485	No
OTP Bank JSC	UAH	3 120	72 894	No
Crnogorska komercialna banka a.d.	EUR	62	16 795	No
Eastern Securities S.A.	RON	1	34	No
VISA Europe Ltd.	EUR	0	0	No
VISA Inc.	USD	0	0	No
OTP Financing Cyprus Company Limited	EUR	0	0	No
OTP Fond de Pensii S.A.	RON	13	817	No
OTP Holding Ltd.	EUR	8	2 238	No
Budapest Bank Nyrt.	HUF	0	0	No
Erste Bank Hungary Nyrt.	HUF	0	0	No
HAGE Zrt.	HUF	0	135	No
Honeywell ESCO Zrt.	HUF	0	37	No
Mátrai Erőmű Zrt.	HUF	0	0	No
Pénzügykutató Zrt.	HUF	0	1	No

Net earnings on equities not included in trading book in 2009 was 1 839 million HUF.

OTP Bank measures banking book interest rate risk via sensitivity analyses based on simulation. The sensitivity analyses below have been determined based on the exposure to interest rates for both derivatives and non-derivative instruments at the balance sheet date. The analysis is prepared assuming the amount of assets and liabilities outstanding at the balance sheet date were outstanding for the whole year. The main assumptions were as follows:

- Floating-rate assets and liabilities were repriced to the modeled benchmark yields at the repricing dates assuming the unchanged margin compared to the last repricing.
- Fixed-rate assets and liabilities were repriced at the contractual maturity date.
- As for liabilities with discretionary repricing feature by the Bank were assumed to be repriced with two-weeks delay, assuming no change in the margin compared to the last repricing date.
- The assets and liabilities with interest rate lower than 0.3% assumed to be unchanged during the whole period.

The simulation was prepared by assuming two scenarios:

- 0.50%-0.75% decrease in average HUF yields (probable scenario)
- 1 % - 1.50% decrease in average HUF yields (alternative scenario)

The net interest income in a one year period after December 31, 2009 would be decreased by HUF 1707 million (probable scenario) and HUF 8421 million (alternative scenario) as a result of these simulation. This effect is counterbalanced by capital gains (HUF 4560 million for probable scenario, HUF 6900 million for alternative scenario) on the government bond portfolio held for hedging.

The effects of the parallel shifts of the yield-curves to the net interest income on a one-year period and to the market value of the hedge government bond portfolio booked against capital can be summarized as follows (HUF million):

Description	Effects to the net interest income (1 year period)	Effects to capital (Price change of AFS government bonds)
HUF -0,1% parallel shift	-551	812
EUR -0,1% parallel shift	-281	0
USD +0,1% parallel shift	-147	0
Total	**-979**	**812**

Counterparty risk management

The establishment of limits is fundamentally influenced by the risk rating of counterparties, which comprises the analysis of financial data and deliberation over qualitative factors. The rating of the counterparty thus established defines the amount of the limit that can be granted to it, and the exposures and maturities for which it is permitted to use the limit. A detailed description of the rating is contained in the Counterparty Rating Regulations, and the manner in which limits are established and broken down into sub-limits are contained in the Risk Exposure Regulations. The regulations are regularly reviewed in consideration of the changes in market trends.

The Collateral Valuation Regulations, reviewed annually, set out the security categories into which the collateral provided by the counterparties with different ratings can be classified, as well as the values assigned to such collateral.

Ratings performed prior to the establishment of limits focus on the vulnerability of the counterparties to negative market trends and special (one-off) shocks. A favourable rating is given to those banks only, whose financial situation (capitalization and liquidity) and external support (from its owner or the state) are both expected to ensure the banks' ability to honour their obligations even if unfavourable events occur.

The Risk Exposure Regulations set out the cases of counterparty exposures where encumbrance on limits can be reduced because collateral items are considered. This is rarely applied. No collateral is linked to the majority of the exposures.

The mark to market method is applied.

OTP MORTGAGE BANK

Calculation methods and approaches of impaired items and provisions

OTP Mortgage Bank. (by the Hungarian abbreviation: JZB) is engaged in an activity falling under the scope of Act XXX. of 1997 on Mortgage Banks and Mortgage Bonds (by the Hungarian abbreviation: Jht.). In order to protect the interests of investors purchasing mortgage bonds, Jht. stipulates tighter-than-usual criteria concerning the coverage securing individual claims and the portfolio as a whole.

Accordingly, the portfolio of OTP Mortgage Bank:

- is homogeneous,
- is comprised, without exception, of loans secured by mortgage, and – for certain loan types – an additional state guarantee as well.

Pertaining to the assessment of the collateral value of the real estate offered as collateral, Jht. stipulates the use of a *loan collateral value*, which is lower than the market value of the real estate, takes certain risks into consideration and is checked and approved by OTP Mortgage Bank. The regulations governing the establishment of this value are approved by the Hungarian State Supervisory Authority for Financial Enterprises (by the Hungarian abbreviation: PSZÁF).

OTP Mortgage Bank's regulations on the collateral registry, which are tight regulations stipulating compliance at the level of the individual collateral items and the portfolio as a whole, are also approved by PSZÁF. Accordingly, OTP Mortgage Bank's portfolio may only contain fully covered loans.

Changes are monitored by the collateral registry system. Given this background, the internal structure, and hence the quality of the portfolio is monitored on an ongoing basis. In keeping with the applicable statutory regulations, loans are rated quarterly, on a case-by-case basis.

An OTP Group-specific phenomenon is that OTP Bank has undertaken contractual commitment to repurchase the receivables that OTP Mortgage Bank rates as 'not problem-free'. Such repurchase occurs monthly and, in addition to payment delay, the pertaining regulations cover considerations regarding the risks associated with OTP Mortgage Bank's receivables. It is the very tool that enables OTP Mortgage Bank to prevent the deterioration of the credit quality of its portfolio.

OTP Mortgage Bank has a homogeneous portfolio, each component of which is a mortgage loan that fully complies with Jht. Relying on their collateral registration system, JZB: rates its outstanding debts through a case-based assessment.

The starting point of the rating process is the payment delay classification provided by the record-keeping systems. In order to define expected losses and classify them into a rating category, further factors must be taken into account.

The most important consideration is that the following problems related to the real estate securing the loan should be taken into consideration:

- a foreclosure proceeding launched by a third party;
- damage, change in the loan collateral value, termination of property insurance or default on the insurance premium;
- any other litigation affecting the enforcement of the lien.

If there is a valid agreement on the settlement of arrears or other problems, evaluation/rating should be performed accordingly.

OTP Bank has undertaken a contractual commitment to the effect that – at the request of JZB – it repurchases at book value the assets, which JZB rates as 'not problem-free' or which, for any other reason, have not been included among the eligible mortgage bond collaterals.

As the application of this guarantee scheme has been in practice in a well-regulated manner for many years now and, in line with the Loan Collateral Valuation Regulations, the guarantee of OTP Bank rules out the risk of losses completely, the loan will be ultimately rated as 'performing' because it is repurchased before any losses materialize.

Naturally, at a bank group level, the incurrence of losses cannot be ruled out altogether. Therefore, OTP Bank sets aside risk provisions for contingent liabilities.

Consequently, JZB does not recognize or reverse impairment. For the same reason, it sets aside risk provisions in minimal amount as is legally required.

Guarantee capital and regulatory capital requirements

The capital requirement calculation of OTP Mortgage Bank is based on HAS and audited data.

OTP Mortgage Bank applied standardized capital calculation method regarding credit and market risk, alternative standardized approach (ASA) regarding the operational risk. OTP Mortgage Bank regulatory capital requirement as of end of December 2009 was 50 billion HUF, the amount of regulatory capital was 62 billion HUF. The capital adequacy ratio stood at 9.91%

OTP Mortgage Bank capital requirement (million HUF)	Q4 2009
Capital requirement	**50 120**
Credit risk	43 490
Market risk	344
Operational risk	6 286

Regulatory capital[7] (million HUF)	Q4 2009
Regulatory capital	**62 106**
Tier1	59 371
Tier2	2 735
Additional capital	0
Deductions	0

Capital requirement for credit and counterparty risk Q4 2009 (million HUF)	Credit	Counterparty	Total
Standardized method capital requirement	**43 409**	**81**	**43 490**
Central governments or central banks	0	0	0
Institutions	625	81	706
Corporate	179	0	179
Retail	6 565	0	6 565
Secured by real estate property	34 970	0	34 970
Past due items	1 055	0	1 055
Other items	15	0	15

[7] Positive components of Tier 1: Share capital, Capital reserve, Tied-up reserve, General reserve, Retained ernings, Balance sheet profit, General risk reserve
Negative components of Tier 1: Goodwill and other intangible assets
Positive components of Tier 1: Lower Tier 2

Exposures[8] broken down by exposure classes

Exposure amounts broken down by exposure classes - gross (million HUF)	Q4 2009
Gross exposure	**1 776 962**
Central governments or central banks	5 135
Institutions	340 476
Corporate	2 957
Retail	171 466
Secured by real estate property	1 243 873
Past due items	12 867
Other items	188

Exposure amounts broken down by exposure classes - net (million HUF)	Q4 2009
Net exposure	**1 776 924**
Central governments or central banks	5 135
Institutions	340 476
Corporate	2 957
Retail	171 428
Secured by real estate property	1 243 873
Past due items	12 867
Other items	188

Exposures[8] broken down by exposure classes and maturity

Exposures broken down by exposure classes and maturity (million HUF)	In 1 year	1 - 2,5 year	2,5 - 5 year	Over 5 year	Without maturity	Non allocated
Total	**389 724**	**127 710**	**208 528**	**1 028 211**	**144**	**22 645**
Central governments or central banks	515	0	0	0	0	4 620
Institutions	321 085	2 216	0	0	0	17 175
Corporate	159	265	383	1 358	0	792
Retail	5 963	12 559	21 943	130 987	0	14
Secured by real estate property	61 530	111 925	184 826	885 592	0	0
Past due items	472	745	1 376	10 274	0	0
Other items	0	0	0	0	144	44

Exposures[8] of foreign countries

Counties	Institutions Q4 2009 (million HUF)
United Kingdom	20 571
Total	**20 571**

Credit risk mitigation

Collaterals used in capital requirement calculation (Q4 2009):

Exposures covered by collaterals (million HUF)	State guarentee	Secured by real estate
Total	**62 236**	**1 254 404**
Retail	61 673	
Secured by real estate property		1 243 873
Past due items	563	10 531

[8] Exposures according to credit and counterparty risk excluding items are treated as negative components of capital

Trading book

At the end of 2009 counterparty risk represented 81 million HUF.

The capital requirement for market risk:

Capital requirement for market risk (million HUF)	Q4 2009
Total	**344**
Position risk	112
FX-rate risk	232

OTP BUILDING SOCIETY

Calculation methods and approaches of impaired items and provisions

OTP Building Society is engaged in an activity falling under the scope of Act CXIII. of 1996 on Home Savings and Loan Association (by the Hungarian abbreviation: LTP) which stipulates tighter-than-usual criteria in order to protect customers.

Its activity is restricted to collecting home savings deposits and providing home acquisition loans.

Its products, business regulations and the General Contractual Terms are approved by the Hungarian State Supervisory Authority for Financial Enterprises (by the Hungarian abbreviation: PSZÁF).

20-30% of authorized customers have utilized their right to take the loan since the start of OTP Building Society.

OTP Building Society's outstanding debts – according to its regulation – are low-amount debts and are evaluated on the basis of group evaluation with a simplified method.

Outstanding debts subject to group evaluation are classified into five rating categories on the basis of payment delay. A certain amount of provision is allocated to each rating category, and it is this percentage value on the basis of which impairment is recognized on all receivables in the same category.

At the end of December 2009 the gross amount of loans was 5331 million HUF from which the non-problem free volume was only 73 million HUF, that is 1.37% of the gross loan volume.

Qualified exposure and volume of provision (million HUF)	Qualified exposure on gross value (31.12.2009)	Volume of provision / impairment (01.01.2009.)	Provision / impairment accounted	Provision / impairment released	Provision / impairment utilized	Exchange difference	Total change of provision / impairment	Volume of provision / impairment (31.12.2009.)
Loans to credit institutions, PBB loans	0	0	0	0	0	0	0	0
Loans to non-financial enterprises	4	0	2	0	0	0	2	2
Household loans	69	20	25	-27	0	0	-2	18
Loans abroad	0	0	0	0	0	0	0	0
Other loans	0	0	0	0	0	0	0	0

Guarantee capital and regulatory capital requirements

The capital requirement calculation of OTP Building Society is based on HAS and audited data.

OTP Building Society applied standardized capital calculation method regarding credit and market risk, basic indicator approach (BIA) regarding the operational risk. OTP Building Society regulatory capital requirement as of end of December 2009 was 1.2 billion HUF, the amount of regulatory capital was 3.7 billion HUF. The capital adequacy ratio stood at 25.59%

OTP Building Society capital requirement (million HUF)	Q4 2009
Capital requirement	**1 160**
Credit risk	335
Market risk	212
Operational risk	613

Regulatory capital[9] (million HUF)	Q4 2009
Regulatory capital	**3 711**
Tier1	3 711
Tier2	0
Additional capital	0
Deductions	0

Capital requirement for credit risk Q4 2009 (million HUF)	Q4 2009
Standardized method capital requirement	**335**
Central governments or central banks	0
Regional governments or local authorities	2
Institutions	0
Corporate	31
Retail	298
Past due items	3
Covered bonds	
Other items	2

Exposures broken down by exposure classes

Exposure amounts broken down by exposure classes - gross (million HUF)	Q4 2009
Gross exposure	**164 607**
Central governments or central banks	101 163
Regional governments or local authorities	29
Institutions	26 205
Corporate	386
Retail	4 981
Past due items	44
Covered bonds	31 777
Other items	22

Exposure amounts broken down by exposure classes - net (million HUF)	Q4 2009
Net exposure	**164 587**
Central governments or central banks	101 163
Regional governments or local authorities	29
Institutions	26 205
Corporate	386
Retail	4 981
Past due items	24
Covered bonds	31 777
Other items	22

Exposures broken down by exposure classes and maturity

Exposures broken down by exposure classes and maturity (million HUF)	In 1 year	1 - 2,5 year	2,5 - 5 year	Over 5 year	Without maturity	Non allocated
Total	**47 083**	**31 734**	**47 118**	**36 550**	**21**	**2 102**
Central governments or central banks	17 961	18 273	31 822	31 117	0	1 991
Regional governments or local authorities	0	0	0	0	0	29
Institutions	26 163	0	0	0	0	42
Corporate	116	148	117	6	0	0
Retail	1 530	1 898	1 416	99	0	38
Past due items	31	7	6	0	0	0
Secured by real estate property	1 282	11 407	13 758	5 329	0	0
Other items	0	0	0	0	21	1

Trading book

The capital requirement for market risk:

Capital requirement for market risk (million HUF)	Q4 2009
Total	**212**
Position risk	212
FX-rate risk	0

[9] Positive components of Tier 1: Share capital, General reserve
Negative components of Tier 1: Goodwill and other intangible assets