

HRVATSKA UDRUGA BANAKA



CROATIAN BANKING ASSOCIATION



2006.

|   |    |
|---|----|
| Uvod  | 4  |
| Ustroj  | 7  |
| O našem radu  | 8  |
| <b>Odbori</b>   | 8  |
| Odbor za devizna pitanja  | 8  |
| Odbor za platni promet  | 8  |
| Odbor za pravna i institucijska pitanja   | 9  |
| Odbor za upravljanje aktivom i pasivom  | 9  |
| Odbor za unutarnji nadzor   | 10 |
| Odbor za kartično poslovanje  | 10 |
| Odbor za razmjenu podataka  | 11 |
| <b>Projekti</b>   | 11 |
| O HROK-u  | 11 |
| Radionice za građane - Upravljanje osobnim financijama                            | 12 |
| Pokazatelj regulacijskog opterećenja za banke                                     | 12 |
| Regulatorni okvir za poslove sekuritizacije u Hrvatskoj                           | 12 |
| Međunarodne aktivnosti  | 13 |
| Kodeks  | 14 |
| Revidirani podaci za poslovne banke   | 30 |
| Odabrani statistički pokazatelji bankarskog sustava i<br>makroekonomskih kretanja | 31 |
| Banke članice Hrvatske udruge banaka  | 38 |
|   |    |
| About us  | 18 |
| Structure   | 21 |
| About our work  | 22 |
| <b>Committees</b>   | 22 |
| Foreign Exchange Committee  | 22 |
| Payment System Committee  | 22 |
| Committee for Legal and Institutional Matters                                     | 23 |
| Assets and Liabilities Management Committee                                       | 23 |
| Internal Audit Committee  | 24 |
| Card Committee  | 24 |
| Information Exchange Committee  | 25 |
| <b>Projects</b>   | 25 |
| About HROK  | 25 |
| Workshops for citizens  | 25 |
| Indicators of regulatory burden on banks  | 26 |
| Regulatory framework for securitisation operations in Croatia                     | 26 |
| International activities  | 27 |
| Code of Good Banking Practice   | 28 |
| Audited Data on Commercial Banks at the End of 2004                               | 30 |
| Selected Banking Sector Statistics and Macroeconomic Indicators                   | 31 |
| Member Banks of the Croatian Banking Association                                  | 38 |

# Zajedno...

:: promičemo interese bankarstva u Hrvatskoj :: štitimo ugled i profesionalnost bankarske struke :: provodimo primjenu općih bankarskih načela i propisa :: podižemo standard bankarskog poslovanja :: usklađujemo stavove bitne za sigurno i stabilno poslovanje :: zastupamo stavove pred državnim tijelima i ustanovama :: pomažemo u širenju novih znanja i primjeni novih tehnika :: surađujemo s gospodarskim subjektima u razvitku zemlje :: potičemo razvoj resursa u bankarstvu :: jačamo ugled hrvatskog bankarstva međunarodnim kontaktima :: učvršćujemo povjerenje naših klijenata u bankarstvo



## O nama

Hrvatska udruga banaka (HUB) nastavila je i tijekom 2005. godine i prve polovice ove raditi na ostvarenju ciljeva zbog kojih je i osnovana 15. listopada 1999. godine kao gospodarsko interesno udruženje bankarske industrije u Hrvatskoj. Trinaest banaka potpisom Ugovora o osnivanju Hrvatske udruge banaka postavilo je osnovne ciljeve Udruge: štiti, braniti i promicati opće interese bankarstva u

cjelini, poticati razvoj ljudskih resursa u bankarstvu, promicati profesionalnost i dosljednost primjene općih bankarskih načela, javno i transparentno poslovanje članica i podizati standard bankarskog poslovanja u Hrvatskoj te ga na tim osnovama približiti standardima zemalja Europske unije. Pristupanjem Hrvatskoj udruzi banaka članice se obvezuju pridržavati se načela Udruge, posebno transparentnosti i dosljednosti poslovanja utemeljenog na općeprihvaćenim etičkim, profesionalnim i drugim standardima struke, primjenu dobrih poslovnih običaja i bankarske prakse, kao i primjenu najboljih standarda očuvanja ugleda struke u odnosu prema javnosti i komitentima.

Od početnih trinaest članica, koje su pri osnivanju predstavljale oko tri četvrtine ukupne aktive banaka u Hrvatskoj, danas imamo sedamnaest članica s udjelom od 96% u ukupnoj aktivu. Početkom ove godine u članstvo je ušla i Hrvatska poštanska banka, najveća od banaka nečlanica, tako da sada HUB okuplja trinaest najvećih banaka po aktivu.

Godišnja skupština Hrvatske udruge banaka održana je u studenom 2005. u Zlatnoj dvorani Instituta za povijest na Gornjem gradu. Poslije radnog dijela, za članove Skupštine i uzvanike iz glavnih institucija financijskog sustava (Hrvatska narodna banka, Ministarstvo financija, Ured predsjednika RH, Ekonomski institut, Hrvatska udruga poslodavaca) predstavljene su tri aktualne teme na kojima je HUB radio proteklu godinu i koje su detaljnije opisane među projektima HUB-a:

- nova zakonodavna regulativa potrebna za razvoj financijskih tržišta, s posebnim osvrtom na sekuritizaciju
- perspektive kretanja troškova bankarske regulacije, s posebnim osvrtom na približavanje regulativi Europske unije
- utjecaj kreditnog registra na bankarstvo i šire gospodarstvo nastavno na osnivanje Hrvatskog registra obveza po kreditima (HROK)

Od početka djelovanja HUB je mogao raditi na svim postavljenim ciljevima samo zahvaljujući predanom radu, sudjelovanju i podršci **banaka članica**. Banke su prepoznale snagu zajedničkog djelovanja i zbog toga je naša Udruga postala i ostat će ključni faktor stabilnosti bankarskog sustava u Hrvatskoj, stalno radeći na jačanju osnovnog elementa na kojemu se zasniva bankarstvo - **povjerenje u banke**. Radna tijela HUB-a (odbori i radne skupine) održala su na desetke sjednica i sastanaka s drugim institucijama, a na njima je veliki broj vrhunskih bankarskih stručnjaka svojim znanjem i iskustvom pridonijelo ostvarivanju zacrtanih ciljeva Udruge.

## Projekti Hrvatske udruge banaka

Krajem 2005. zaključen je širok projekt u kojemu je HUB sudjelovao kao najvažniji, ali ne i jedini naručitelj - "**Perspektive razvoja nebankarskog financijskog posredovanja i tržišta kapitala u Hrvatskoj**". Završni materijal služi za potpunije razumijevanje uloge globalizacijskih procesa u stručnoj i političkoj javnosti te ključnog mjesta financijskih institucija i tržišta u tom procesu, bolje

razumijevanje osnova regulative EU i optimalnog načina formalne i stvarne konvergencije prema EU-standardima, kao i početak afirmacije načela partnerstva privatnog i javnog sektora i procesa konzultacija u postupcima promjene regulative. Cijeli projekt objavljen je u knjizi "Veza koja nedostaje", a pojedini dijelovi, kao npr. poglavlje o sekuritizaciji, poslužili su za pokretanje inicijative na izradi zakonodavnog rješenja potrebnog za razvoj te bankarske tehnike. Banke članice HUB-a prihvatile su se vodstva projekta zajedno s partnerima iz državnog i privatnog sektora, s ciljem da do polovice 2006. godine imamo pregled stanja i mogućih rješenja, a da se nakon toga odluči o drugoj fazi - realizacija.

Sredinom 2005. godine zaključena je i studija "**Pokazatelji regulacijskog opterećenja banaka u šest zemalja srednje Europe i Hrvatskoj**" u suradnji s konzultantskom tvrtkom Arhivanalitika. Nadali smo se da će zaključiti studije (objavljena i na web-stranicama) poslužiti za otvaranje razgovora s regulatornim institucijama, kako bi i one mogle primijeniti metodologiju u cilju smanjenja regulatornog opterećenja u Hrvatskoj. Objašnjeni su razlozi koji su doveli do toga da je trošak regulacije veći nego u susjednim zemljama, a u sklopu pristupanja Europskoj uniji došlo je i vrijeme da se opterećenje smanji jer je naš sustav dovoljno razvijen, siguran i stabilan.

Kao nadgradnja Sustavu razmjene informacija (SRI) o neurednim dužnicima koji je HUB uspostavio početkom 2004. godine i tako pružio konkretnu podršku bankama članicama u boljem upravljanju kreditnim rizikom, Izvršni odbor HUB-a odlučio je ostvariti "puni" kreditni registar u Hrvatskoj - **Hrvatski registar obveza po kreditima** (HROK). Nakon usuglašavanja svih potrebnih pravnih i administrativnih formalnosti, društveni ugovor potpisalo je 20 hrvatskih banaka i **HROK d.o.o.** (www.hrok.hr) upisan je u registar Trgovačkog suda početkom 2005. godine.

#### Aktivnosti

U okviru svojih aktivnosti Hrvatska udruga banaka surađuje s nizom drugih ustanova, a posebno s dvije najvažnije za bankarsku industriju u Hrvatskoj - **Hrvatskom narodnom bankom i Ministarstvom financija**. Sudjelujemo pri izradi zakonskih tekstova, podzakonskih akata, provedbenih propisa i druge regulative na području bankarstva i financija. Takva suradnja s jedne strane dovodi do donošenja kvalitetnijih propisa, jer predlagateljima daje uvid u provedivost propisa, a s druge osigurava da se interesi i glas banaka predstave i argumentiraju već u ranoj fazi donošenja, tako da predlagatelji mogu donijeti najbolje odluke u interesu stabilnosti financijskog sustava u Hrvatskoj. U slučajevima kad regulatorne mjere nisu u interesu banaka, ili im izravno štete, HUB nastoji sagledati sve razloge i stručnim argumentima poticati diskusiju u cilju izmjene ili ublažavanja efekta tih mjera.

Uz formalno sudjelovanje u **Nacionalnom odboru za platni promet**, koji je osnovan na inicijativu Hrvatske narodne banke, i **Odbora za utvrđivanje kamatnih stopa**, osnovanog temeljem Zakona o kamatama, HUB sudjeluje i u drugim radnim skupinama koje ove dvije ustanove sazivaju bilo na trajnoj ili ad hoc osnovi. Na operativnoj strani predstavnici HUB-a usuglašavaju stavove i sudjeluju u **Vijeću sudionika Nacionalnog klirinškog sustava** (NKS) pod vodstvom Financijske agencije (FINA) i u **Koordinacijskom odboru Projekta ustroja Gotovinskih centara** koji ima za cilj uspostaviti gotovinske centre u skladu s regulativom HNB-a, te u suradnji s bankama racionalizirati postojeći sustav manipulacije gotovim novcem u zemlji uz razvijanje infrastrukture koja će bitno podići standarde u poslovanju. Krajem 2005. i u prvoj polovici ove godine aktivnosti su se intenzivirale i učinili dodatni napor da se nađe dugoročno najbolje rješenje za hrvatsko tržište gotovinom i srodnim uslugama.

Preko kolektivnog pridruženog članstva u **Hrvatskoj udruzi poslodavaca** (HUP), kao vanjski član sudjelujemo u radu **Odbora za financije i državni proračun** Hrvatskog sabora, na čijim sjednicama imamo priliku izložiti stavove bankarstva i šireg gospodarstva na sve prijedloge zakona i ostale teme o kojima raspravlja Odbor. Zajedno s HUP-om i tri komore (gospodarska, obrtnička i odvjetnička), HUB je osnovao **Nacionalni odbor Međunarodne trgovačke komore** (ICC), a direktor HUB-a i predsjednik Skupštine HUB-a su po definiciji i članovi Izvršnog odbora ICC Hrvatska.

Sukladno sa svojim mandatom, Hrvatska udruga banaka prisutna je u nizu drugih projekata i kontakata s hrvatskim i stranim organizacijama, pružajući informacije o hrvatskom bankarstvu, odgovarajući na prijedloge i upite, povezujući zainteresirane institucije s bankama našim članicama ili drugim ustanovama u Hrvatskoj. Primjeri inicijativa u kojima HUB radi na osmišljavanju konkretnih projekata za banke su projekt UNDP-a (United Nations Development Programme) na temu društvene odgovornosti banaka i USAID-a (United States Agency for International Development) na temu hipotekarnog financiranja u državama jugoistočne Europe.

Samo neki od konkretnih rezultata rada HUB-a u protekloj godini su uvođenje standarda IBAN-a (International Bank Account Number) u Hrvatsku; pregovaranje o novoj tarifnoj strukturi Nacionalnog klirinškog sustava (NKS); smanjenje premije za osiguranje depozita; bitne promjene u platnom prometu s inozemstvom.

#### Način rada

Najvažnije tijelo Hrvatske udruge banaka je **Izvršni odbor HUB-a**, koji u pravilu jednom mjesečno okuplja predsjednike ili članove uprava svih najvećih banaka i koji donosi sve strateške odluke i smjerove budućeg djelovanja HUB-a. Sukladno s Ugovorom o osnivanju HUB-a i manje banke imaju nekoliko predstavnika u Izvršnom odboru kako bi ravnopravno sudjelovale u donošenju najvažnijih odluka. Bitan nam je aktivni doprinos ključnih ljudi hrvatskog bankarstva, i samo s njim možemo voditi Udrugu smjerom kojim se kreće te pravilno djelovati na pitanjima od zajedničkog interesa hrvatske bankarske industrije.

Više o aktivnostima pojedinih odbora Hrvatske udruge banaka nalazi se u nastavku teksta, kao i na našim Internet stranicama [www.hub.hr](http://www.hub.hr), a ovdje

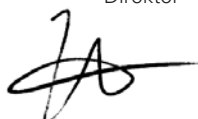
posebno i iskreno želim zahvaliti na suradnji, uloženom vremenu i podršci koje su nam pružile banke članice Hrvatske udruge banaka, kao i našim vanjskim sugovornicima, bez čije spremnosti i otvorenosti ne bi bilo moguće ostvariti rezultate. Uz posebnu zahvalu predsjedavajućima odbora HUB-a, koji su radili na pripremi tekstova o radu odbora, ukratko ću spomenuti i aktivnosti nekih radnih skupina HUB-a.

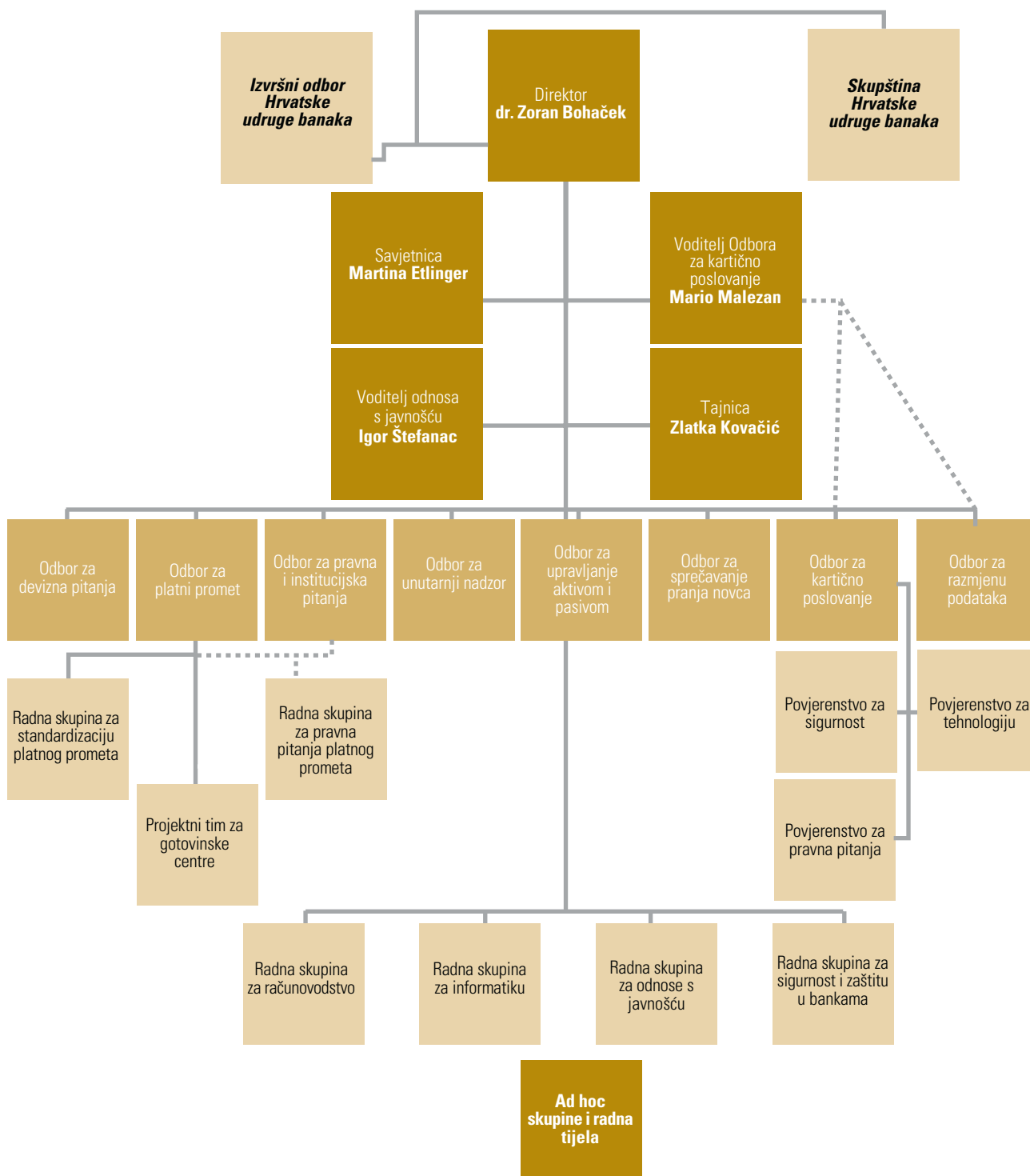
**Radna skupina za sigurnost i zaštitu u bankama**, osim redovitih susreta i suradnje s Ministarstvom unutarnjih poslova (MUP) (koja se potvrđuje i dodjelom godišnje nagrade HUB-a pripadnicima MUP-a sudionicima u razrješavanju kaznenih djela počinjenih na štetu banaka), bila je aktivno uključena u lobiranje prije donošenja izmjena pravilnicima Zakona o minimalnim mjerama zaštite u poslovanju s gotovim novcem i vrijednostima. Iako je taj Zakon po našem mišljenju suvišan, nakon donošenja nastavili su se razgovori s MUP-om oko primjene Zakona koji je stupio na snagu 1. srpnja 2006. u cilju da sve banke budu u mogućnosti kao primarno učinkovito zaštititi svoje klijente i zaposlenike, a istovremeno poštovati sve zakonske propise i podzakonske akte.

U cilju jačanja suradnje s Uredom za sprečavanje pranja novca Republike Hrvatske, naša dosadašnja Radna skupina za sprečavanje pranja novca, prerasla je u **Odbor za sprečavanje pranja novca HUB-a**, i u svoj pravilnik ugradila obvezu redovite suradnje i konzultacija s Uredom. Delegacija Odbora odmah se uključila u razgovore s Uredom radi pojašnjenja pojedinih i donošenja novih pravila rada, a najesen se očekuje i početak izrade novog Zakona o sprečavanju pranja novca, usuglašenog s najvišim europskim standardima.

Posebno želim zahvaliti malom, ali hrabrom timu HUB-a, jer bez njihovih napora da se sve naše aktivnosti odvijaju na najbolji mogući način ne bismo postigli da naši sugovornici, iz banaka ili izvan njih, gledaju na **Hrvatsku udругu banaka** kao na pouzdanog partnera, sugovornika i podršku njihovim idejama i inicijativama. Hvala vam Martina, Zlatka, Mario i Igor!

Zoran Bohaček  
Direktor







### Odbori

#### Odbor za devizna pitanja

Izvršni odbor HUB-a odobrio je osnivanje **Odbora za devizna pitanja** 2002. godine, ali je njegovo djelovanje završeno tek u 2004. godini kad su imenovani predsjednik i njegovi zamjenici te usvojen Poslovnik.

Krajem 2005. i u prvoj polovici ove godine. Odbor je pretežito razmatrao podzakonske akte koje je donijela Hrvatska narodna banka, a koje se vežu uz Zakon o deviznom poslovanju. Iako se od novih akata očekivala znatna liberalizacija poslovanja, proći će još dodatno razdoblje prije nego se u poslovanju banaka u Hrvatskoj ukinu elementi preostali iz ranijih razdoblja, a poglavito se to odnosi na kontrolnu funkciju banaka. Ipak, može se ustvrditi kako su određeni pozitivni pomaci učinjeni od strane nadležnih ustanova - Hrvatske narodne banke i Ministarstva financija.

Posebno je za Odbor bio važan dijalog s HNB-om, tako da je tijekom izrade nekih akata HUB u ime banaka tražio mogućnost komentara radnih verzija, pa su banke putem Odbora mogle ukazati na moguće nedoumice koje mogu nastati u primjeni, a također su predstavnici banaka imali mnogo praktičnih pitanja. Budući da je riječ o aktima koji vrlo detaljno obuhvaćaju transakcijske poslove prema inozemstvu i iz inozemstva, pitanja i stručnih komentara je bilo mnogo, a Hrvatska narodna banka je, od najviših do stručnih struktura, davala odgovore i smjernice. Iako su zahvati u informatičkoj podršci bili znatni, komunikacija s HNB-om o svim aspektima primjene propisa izuzetno je korisna za pripremu banaka, kao i za ispravno razumijevanje izmjena propisa koji se nadovezuju jedni na druge.

Podzakonski akti - **Odluka o uvjetima i načinu obavljanja platnog prometa s inozemstvom** i **Uputa za provedbu Odluke o uvjetima i načinu obavljanja platnog prometa s inozemstvom** bili su ključni za rad odbora u protekloj godini, ali Odbor je povremeno razmatrao i druga pitanja, npr. uporabu IBAN-a (International Bank Account Number; međunarodni broj bankovnog računa) pa su banke prilagodile informatičku podršku za izdavanje IBAN-a.

U bližoj budućnosti, zbog sinergije domaćeg i deviznog platnog prometa i u kontekstu ulaska u sustav Europske unije, izgledno je da će **Odbor za platni promet** (domaći) i Odbor za devizna pitanja prerasti u jedno tijelo, s radnim skupinama ili se ustrojiti na drugi način, za što bolje djelovanje takvog tijela.

Dokaz te sinergije je i djelovanje **Radne skupine za standardizaciju platnog prometa**, koju je osnovao Odbor za platni promet i ranije je radila na temama domaćeg platnog prometa (obrazac naloga za plaćanje i dr.), a sada je okupila članove i iz domaćeg (kuskog) i iz deviznog platnog prometa. Zajednički, bankarski stručnjaci, iz dvaju segmenata platnog prometa (domaći i međunarodni), osmislili su i prihvatili **Preporuke o postupanju u platnom prometu s inozemstvom - naplate i plaćanja s inozemstvom i u RH (devize i kune)**. Preporuke su namijenjene bankama i standard su u postupanju s određenim vrstama transakcija, a cilj tih preporuka bio je odrediti načine ponašanja koja nisu pokrivena propisima, a potrebna su radi promptnijeg i točnog provođenja transakcija te reduciranja troškova, kako za banke tako i za njihove klijente.

#### Odbor za platni promet

Odbor za platni promet je od svog osnutka 2002. godine bio vrlo aktivan u radu na rješavanju otvorenih pitanja i problema u funkcioniranju platnog prometa u zemlji, kao tada novouvedenog produkta banaka.

Tako je i u vremenu od prethodnog izvješća ovaj Odbor rješavao neka specifična pitanja platnog prometa u zemlji kao:

- putem Savjeta Vijeća sudionika NKS-a uspjelo se utjecati na Finu i HNB da se utvrdi cjenik usluga NKS-a na transparentniji način kojim se tarifira broj, a ne broj i iznos transakcija, te da cijena osjetno varira o ciklusu provođenja. Novi cjenik se primjenjuje od 1. srpnja 05. i donio je korisnicima sniženje troškova;
- temeljem Zakona o izmjenama i dopunama Ovršnog zakona, Odbor je usuglasio postupanje banaka s osnovama za plaćanje (blokade), budući da odredbe Zakona o izmjenama i dopunama Ovršnog zakona nisu usklađene s odredbama Zakona o platnom prometu u zemlji.

Usklađivanjem zakonodavstva Republike Hrvatske sa zakonodavstvom Europske unije, platni promet u zemlji i devizni platni promet sve se više povezuju na putu prema multivalutnom računu. Zato je u proteklom razdoblju bila vrlo aktivna Radna skupina za standardizaciju platnog prometa. Ova Radna skupina utvrđivala je postupanje banaka u skladu s novom Odlukom o obavljanju platnog prometa s inozemstvom i rješavala standardizaciju plaćanja kroz sustave "naplatne" i "ispladne" banke kroz kanale platnog prometa u zemlji.

U proteklih godinu dana najaktivniji dio Odbora za platni promet bio je Projektni tim za gotovinske centre. Osnivanje ovog Projektnog tima posljedica je nezadovoljstva banaka članica HUB-a postojećom uslugom Fine u području poslovanja s gotovinom te posebno cijenom usluge koja je previsoka za banke, ali i njihove klijente.

Projektni tim tijekom proteklih godinu dana radio je na:

- postavljanju modela mogućeg ustroja gotovinskih centra u vlasništvu banaka
- cost-benefit analizi mogućih modela ustroja
- analizi postojećih kapaciteta banaka, potencijano raspoloživih za gotovinske centre
- procjeni potrebnih ulaganja za izgradnju gotovinskih centara.

Osim toga je značajnim tvrtkama koje se u Europi bave poslovanjem s gotovinom te Fini upućen "Request for Proposal" za participiranje u formiranju gotovinskih centara prema tri modela sudjelovanja. Dvije ponude uzete su u uži izbor za daljnje razmatranje i utvrđivanje moguće vlasničke strukture budućih gotovinskih centara.

Projekt ustroja gotovinskih centara ostaje najznačajniji i prioritetni projekt ovog Odbora za ovu godinu.

**Radna skupina za pravna pitanja platnog prometa**, koju je osnovao Odbor za platni promet, nekoliko se puta sastajala, razmatrajući **novele Ovršnog zakona**, ponajprije redosljed provođenja osnova za plaćanje po noveli u odnosu na ranije važeći zakon, u cilju izbjegavanja narušavanja redosljeda osnova za plaćanje. Jednako tako, Do ovakvih pitanja dolazi iz razloga što pojedini zakoni dopuštaju različitost u tumačenju, a mišljenja nadležnih tijela, kad ih banke i dobiju, nemaju snagu zakona.

Odbor za pravna i institucijska pitanja

**Odbor za pravna i institucijska pitanja** pokreće inicijative od interesa za pravne strukture u bankama članicama HUB-a, daje svoje prijedloge Izvršnom odboru i drugim organima HUB-a te donosi mišljenja i preporuke o temama iz pravnog područja koje predlaže Izvršni odbor ili drugi organi HUB-a.

Odbor za pravna i institucijska pitanja tijekom 2005./2006. bavio se problematikom iz područja Zakona o obveznim odnosima, posebno odredbama koje reguliraju obračun kamate na kamatu, zatim propise koji reguliraju zaštitu osobnih podataka, preostala pitanja prijenosa **deviznih depozita u javni dug RH za staru deviznu štednju** (Zakon o pretvaranju deviznih depozita građana u javni dug RH), te potrebe pojašnjenja Zakona o pokretninama i drugim stvarnim pravima, odnosno odredbe koje su nejasne u odnosu na primjenu Zakona

o bankama, tako da će se vjerojatno zatražiti pojašnjenje zakonodavca za neka od tih pitanja.

Članovi Odbora ili predstavnici banaka koje su delegirali sudjelovali su na više sastanaka, primjerice u Ministarstvu pravosuđa na temu digitalizacije zemljišnih knjiga pa je Odbor putem HUB-a ukazao na određene teškoće vezane uz primjenu Zakona o **izmjenama i dopunama Zakona o zemljišnim knjigama**.

Dodatno, predstavnici pravnik iz banaka odazvali su se susretu s predstavnicima Ministarstva pravosuđa i vanjskih stručnjaka zaduženih za Projekt tehničke pomoći u vezi sa stečajevima, i na njemu dali viđenje banaka o vođenju stečajeva, kako banaka tako i poduzeća.

Članovi Odbora za pravna i institucijska pitanja razmijenili su mišljenja koja su pojedine banke dobile od nadležnih ustanova o bitnim temama za poslovanje banaka, pa je takva razmjena na razini struke ocijenjena pozitivnom.

Odbor za upravljanje aktivom i pasivom

Odbor za upravljanje aktivom i pasivom bavi se pitanjima upravljanja aktivom i pasivom u bankama, a njegovi članovi su u pravilu voditelji riznica iz banaka, s osnovnom temom razmatranja mjera iz domene centralno-bankarskih operacija Hrvatske narodne banke (HNB).

Odbor je surađivao na projektu Arhivanalitike o problemima razvoja poslova sekuritizacije u Hrvatskoj, u sklopu projekta "Perspektive razvoja financijskog posredovanja u Hrvatskoj". Odbor je iznio svoje prijedloge i zaključke te predložio moguća rješenja problema.

Također je sudjelovao na projektu Arhivanalitike "Indeks regulatornog opterećenja" te prihvatio metodologiju koja je prihvaćena i na Izvršnom odboru HUB-a.

Referentni pokazatelji **ZIBOR** (Zagreb Interbank Offered Rate) i **ZAGREB FIXING ZA OBVEZNICE** objavljuju se u okviru Hrvatske udruge banaka od sredine 2002. godine sukladno s dogovorom i uz koordinaciju i nadzor Odbora za upravljanje aktivom i pasivom Hrvatske udruge banaka. Hrvatska udruga banaka objavljuje referentne stope, a od travnja ove godine Reuters Hrvatska preuzeo je ulogu službenog izračunavatelja. Osim na sustavu Reutersa, referentni pokazatelji dostupni su na: [www.hub.hr](http://www.hub.hr) i [www.reuters.hr](http://www.reuters.hr).

**ZIBOR** (Zagreb Interbank Offered Rate) jedinstvena je referentna ponudbena kamatna stopa za kunski sredstva na hrvatskom međubankarskom tržištu koja odražava prosječne stope referentnih hrvatskih banaka za depozite u hrvatskim kunama po međunarodno priznatim dospeljima, od prekonocnih posudbi do plasmana na rok do šest mjeseci.

**ZAGREB FIXING ZA OBVEZNICE** zamišljen je kao benchmark, odnosno referentni pokazatelj cijene hrvatskih obveznica na domaćem tržištu fiksnog prinosa ("fixed income"). Popis obveznica odredile su najaktivnije banke na tom tržištu ("market makeri"), koje na taj način, svakodnevnim redovitim kontribuiranjem i objavom ponudbenih i potražnih kotacija za cijene određenih obveznica doprinose transparentnijem i likvidnijem tržištu, omogućuju njegov daljnji razvoj. Osim pružanja što transparentnijih informacija s domaćeg tržišta kapitala, cilj spomenutog fixinga je postati jedinstveni benchmark za vrednovanje portfelja.

#### Odbor za unutarnji nadzor

U posljednjih nekoliko godina tehnologija rada u bankama doživljava značajne promjene. Posljedica toga je potreba za uspostavljanjem novih metoda u upravljanju rizicima svakodnevnog poslovanja. Postojeći sustavi unutarnjih kontrola se redizajniraju. Interne revizije u bankama imaju zadatak slijediti sve te promjene i specifičnim metodama otkrivati slabosti u uspostavljenom lancu kontrolnih točaka.

Što zbog vlastitih spoznaja, a dijelom uz poticaj međunarodne zajednice, mijenja se hrvatska bankarska regulativa i u svojoj opsežnosti vezana je za niz provedbenih pitanja. Kako bi interna revizija mogla obavljati sve zadatke koji proizlaze iz međunarodnih standarda i iz Zakona o bankama, na sjednicama Odbora posvetilo se najviše pozornosti raspravi oko provedbe pojedinih podzakonskih propisa iz razloga njihove kompleksnosti i ponekad nerazumljivosti pa stoga i problematičnosti u načinu primjene. Ovakve teme su dominirale na svim sjednicama Odbora, od njegovog osnivanja 2001. godine.

I nadalje je bila aktualna tema koordinacije internih revizija unutar članica grupe pravnih osoba, uz temu kompetencije i zadataka interne revizije matične banke u odnosu na članice grupe.

Također je definiran i prioritet rada Odbora za iduća razdoblja. Naime, u smislu razvoja metoda za otkrivanje rizika i slabih točaka u internom sustavu kontrole, evidentna je potreba za usavršavanjem revizorskih vještina i održavanje savjetovanja na temu IT revizije i revizije poslova riznice. Navedene

dvije teme odabrane su kao prve u nizu savjetovanja i seminara koje za interne revizore organizira Odbor, odnosno Udruga.

#### Odbor za kartično poslovanje

Članovi Odbora za kartično poslovanje su principalni članovi MasterCard Internationala i VISA-e: Zagrebačka banka d.d., Privredna banka d.d., Erste&Steiermarkische bank d.d., Splitska banka d.d., Raiffeisenbank Austria d.d., Hrvatska Poštanska Banka d.d., Slavenska banka d.d., Hypo Alpe-AdriaBank d.d., te kartične kuće: PBZ American Express d.o.o. i Diners Club Adriatic d.d.

Ostale banke koje posluju s kartičnim proizvodima sudjeluju u radu Odbora kao affiliatei banaka principalnih članica.

Djelokrug rada Odbora su nekompetitivna područja kartičnog poslovanja, kao što su: sigurnost, tehnologija te pravo, na razini brendova MC-a, VISA-e, AmExa i Dinersa.

U okviru Odbora djeluju sljedeća povjerenstva:

- Povjerenstvo za sigurnost;
- Povjerenstvo za tehnologiju;
- Pravno Povjerenstvo.

U proteklih godinu dana Odbor se bavio pitanjima dopune Kaznenog zakona u području kartičnog poslovanja, sudjelovanju kartičnih odjela u Sustavu za razmjenu informacija (lista neurednih dužnika), definiranju sigurnosnih standarda te novim oblicima kartičnih prijevara i zloupotreba.

U sferi izmjena i dopuna postojećeg Kaznenog zakona ustanovljeno je da u postojećem KZ-u prekršaji u području kartičnog poslovanja nisu adekvatno sankcionirani, pa je tokom 2005. godine nastavljena suradnja s Ministarstvom pravosuđa, uprave i lokalne samouprave i s Državnim odvjetništvom sa ciljem da se navedena problematika uključi u Zakon o izmjenama i dopunama KZ-a. Namjera Odbora i Stručne skupine za izmjenu KZ-a pri navedenom Ministarstvu je usklađivanje KZ-a sa smjernicama zakonodavne regulative EU koja regulira prijevare i zloupotrebe s bezgotovinskim sredstvima plaćanja.

Na području povećanja sigurnosti u kartičnom poslovanju Odbor je poduzeo niz aktivnosti. Radi zaštite bankomatske mreže banke su instalirale na monitore bankomata slike koje upućuju klijente da provjere je li otvor za unos kartica originalnog izgleda te crtežem koji upućuje klijente da zaklone unos PIN-a.

Sljedeća mjera povećanja sigurnosti je sudjelovanje kartičnih odjela banaka u Sustavu za razmjenu informacija, kojim se razmjenjuje između banaka lista neurednih dužnika (fizičkih osoba). Navedene liste formiraju se i razmjenjuju krajem tekućeg mjeseca u skladu s dogovorenim kriterijima na mjesečnoj razini.

Zamjenom magnetnih kartica sa chip karticama pruža se mogućnost za značajno povećanje sigurnosti u kartičnom poslovanju uvođenjem PIN-a na chip kreditne i charge kartice te unapređenjem bankomatske i POS mreže za prihvatanje istih kojima će se u značajnoj mjeri smanjiti pojedini oblici prijevare i zloupotreba.

Poboljšanje sigurnosti rada u kartičnom poslovanju pridonjeti će i donešeni sigurnosni standardi za naše tržište kojima se stimuliraju trgovci na otkrivanje krivotvorenih kartica i određenih oblika prijevare, te dogradnja MCC-a kojima će se omogućiti preciznije praćenje rada trgovaca.

#### Odbor za razmjenu podataka

Tijekom 2005. godine Odbor za razmjenu podataka nastavio je uspješno razmjenjivati podatke o neurednim dužnicima između banaka koje sudjeluju u sustavu SRI-ja.

Sudionici razmjene podataka obvezni su djelovati odgovorno i primjenjivati sve mjere za očuvanje sigurnosti i tajnosti informacija, u skladu s propisima i internim aktima. Predviđeno je u

sljedećem razdoblju unapređenje SRI-ja po uspostavi kreditnog registra obveza po kreditima.

Učinci razmjene podataka o neurednim dužnicima su zamjetni jer se povećala disciplina u ispunjavanju kreditnih zahtjeva, ali i poboljšala naplata nekih kreditnih proizvoda koji su bili na rubu neurednosti. Na kraju, uspostava razmjene informacija najviše će pogodovati potrošačima jer će banke eliminiranjem potencijalno loših kredita smanjiti svoje rizike i moći kvalitetnim dužnicima ponuditi **više, bolje i povoljnije** (veće iznose, uz jednostavnije procedure i s nižim kamatama) kreditne proizvode.

## Projekti

### O HROK-u

Sa zadovoljstvom se može utvrditi kako je projekt uspostave kreditnog registra u Republici Hrvatskoj ušao u završnu fazu. Još ove godine Hrvatski registar obveza po kreditima počeo će na zahtjev svojih korisnika dostavljati prva kreditna izvješća, čime će se Republika Hrvatska pridružiti svim onim modernim financijskim državama koje takve sustave poznaju i primjenjuju niz godina.

HROK kao poduzeće i pravna osoba djeluje od veljače 2005. godine. Tada su počeli i završni pregovori oko licencnog ugovora s TransUnion - Crifom (TUC-om) koji je potpisan prije ljeta 2005. Potrebno je naglasiti kako su dogovoreni izuzetno povoljni uvjeti za dobivanje najnovije generacije TUC-ovog iCRS (International Credit Reporting Service) sustava, uz sve predviđene nadogradnje i nadopune sustava onako kako će se on dalje razvijati i ažurirati u petnaestak zemalja u kojima funkcionira. Odluka o ovakvom sustavu bila je strateška odluka hrvatskih banaka koje su odlučile nabaviti najbolji mogući sustav zbog njegove pouzdanosti, sigurnosti i zaštite svih podataka.

HROK je u međuvremenu ojačao i kadrovski i tehnički. Nabavljena je vrhunska informatička oprema koja je instalirana, a sredinom veljače 2006. u Zagrebu boravili su predstavnici TUC-a koji su, sukladno s planom, pomogli pri uspostavi prve verzije sustava i tako omogućili lokalno testiranje. Također, u nizu sastanaka s tehničkim i poslovnim odborima HROK-a odgovorili su na sva pitanja koja su se pojavila tijekom rada na projektu.

U završnoj fazi prije samog početka operativnog rada, a nakon što se baza registra inicijalno napuni, vidjet će se kako cijeli sustav funkcionira te je li potrebno još nešto unaprijediti kako u trenutku kada se počnu dostavljati prva izvješća sve bude u najboljem redu. Nadamo se da će se u toj fazi sve odvijati prema planu te da ćemo vrlo brzo moći vidjeti pune prednosti institucije kreditnog registra koja je, kao što smo spomenuli ranije, dugi niz godina poznata u razvijenom financijskom svijetu.

Radionice za građane  
- Upravljanje  
osobnim financijama

**Upravljanje osobnim financijama**

Inicijativa koju je **Program Ujedinjenih naroda za razvoj** (engl. United Nations Development Programme, skr. UNDP) predložio bankama i Hrvatskoj udruzi banaka, uz podršku Izvršnog odbora HUB-a, ubrzo je prerasla u projekt jer je prepoznata želja i potreba da banke doprinesu zajednici i na taj način - besplatno educirajući građane-korisnike čime se doprinosi već

prepoznatom konceptu društvene odgovornosti.

Tijekom lipnja, srpnja i rujna ove godine u Zagrebu se održavaju besplatne obrazovne radionice za odrasle građane pod nazivom **Upravljanje osobnim financijama - Kako uskladiti primanja i troškove**, a vode ih predstavnici banaka u suradnji s HUB-om i UNDP-om.

U provođenju tih radionica aktivno sudjeluje šest banaka-članica (Hypo Alpe-Adria banka, Erste&Steiermärkische banka, OTP banka, Privredna banka Zagreb, Slavonska banka i Volksbank), a očekujemo da će pilot-projekt pomoći u informiranju građana te omogućiti donošenje kvalitetnijih i preciznijih odluka u pogledu financijskih pitanja s kojima se susreću u svakodnevnom životu - kratkoročnim i dugoročnim ciljevima, mogućnostima i željama u kontekstu postojećih prihoda i rashoda. U pripremi radionica sudjelovale su i druge članice HUB-a.

Kao mjesto izvođenja pilot-projekta odabran je Zagreb, a u daljnjim se fazama očekuje sudjelovanje više banaka, kao i proširenje po svim regijama Hrvatske, prema zaključcima i povratnim informacijama koje ćemo dobiti tijekom pilot-projekta, kako od polaznika tako i od predstavnika banaka uključenih u projekt. Dakle, po prvi put u Hrvatskoj banke su **zajednički** te u suradnji s drugim subjektima osmislile program besplatnih radionica za građane u kojima ih podučavaju kako upravljati vlastitim financijama na dugoročno održiv način i kako bolje razumijevati bankarsko-financijske pojmove. U fokusu projekta HUB-a i banaka je klijent i odgovornost banke za što otvoreniji (transparentniji) i dugoročno održiv međusobni odnos.

Na projektu su u pripreмноj fazi radila dva zajednička tima iz banaka: prvi se sastojao od stručnjaka za poslovanje s građanstvom i njegov je zadatak bio izraditi program i materijale za radionice, a drugi od stručnjaka za komunikacije koji su izradili komunikacijsku strategiju za projekt. Timovi sastavljeni od stručnjaka za upravljanje ljudskim resursima te za razvoj novih proizvoda također su sazivani povremeno radi rješavanja konkretnih pitanja.

Osim izravnog utjecaja na financijsko ponašanje građana, projekt će utjecati i na čitavo područje društveno odgovornog poslovanja u Hrvatskoj jer će kroz njega biti po prvi put dokumentirane i poslovne prednosti takvog angažmana: snaženje inovativnosti i razvoja novih proizvoda, utjecaj na reputaciju te razvoj ljudskog kapitala.

**Partnerstvom s UNDP-om** i suradnjom s drugim udrugama civilnog društva, kao što je udruga Potrošač, ojačali smo i uveli nove načine komunikacije sa sudionicima i građanstvom, a to su dodatna vrata kroz koja su banke otvorene prema zajednici u kojoj posluju.

Pokazatelj  
regulacijskog  
opterećenja za banke

Tijekom 2005. godine Arhivalitika je na inicijativu i uz potporu Hrvatske udruge banaka provela prvo komparativno istraživanje o troškovima regulacije banaka u Hrvatskoj te šest zemalja srednje Europe: Austrije, Italije, Mađarske, Češke, Poljske i Slovenije. Istraživanje je ponovljeno, a izračuni ažurirani početkom ove godine, na temelju podataka iz prosinca 2005.

Analiza troškova regulacije banaka pruža egzaktnu i usporedivu mjeru troškova regulacije banaka u Hrvatskoj i izabranim zemljama. Ona je istovremeno instrument za proces simuliranja učinaka regulacije na troškove poslovanja kad god dolazi do promjena ili uvođenja novih mjera monetarne i devizne politike. Metodologija izračuna pruža i okvir za konstruktivan dijalog između regulatora i bankarske industrije. Tome posebno pridonosi činjenica da se ovom metodologijom nastoje kvantificirati i društvene koristi od regulacije, tako da pokazatelj regulacijskog opterećenja nastoji mjeriti neto trošak regulacije banaka. Prvi su rezultati pokazali visinu, trendove i međunarodnu usporedbu troškova regulacije za banke u promatranoj grupi zemalja, pokazavši razmjernu visinu tih troškova u Hrvatskoj.

Rezultati su prezentirani raznim međunarodnim forumima i pobudili zanimanje Europske bankovne federacije i projekta Convergence Svjetske banke za financijski razvitak u jugoistočnoj Europi.

Regulatorni okvir za  
poslove sekuritizacije  
u Hrvatskoj

Neki financijski poslovi koji su uobičajeni na međunarodnim tržištima u Hrvatskoj se ne mogu odvijati zbog prevelikih regulacijskih rizika. U tu vrstu poslova svakako spada sekuritizacija. Postoje nepoznanice o tome koje bi se regulacijske odredbe i kako primjenjivale na pojedine elemente takve

financijske transakcije. Zbog toga se gube prigode za povoljnije pribavljanje kapitala za investiranje gospodarskih subjekata i same države, zatim za širenje palete za ulaganja hrvatskih institucionalnih i privatnih investitora u vrijednosne papire, pa se otvara opasnost da se, nakon predstojeće liberalizacije međunarodnih tokova kapitala, hrvatske financijske imovine sekuritiziraju u inozemstvu. Imajući u vidu ova razvojna ograničenja, Ministarstvo financija zacrtalo je svojim planom rada za 2006. godinu izradu prijedloga regulatornog okvira za poslove sekuritizacije u Hrvatskoj.

Zbog složenosti i specifičnosti sekuritizacijskih transakcija, Hrvatska udruga banaka formirala je grupu stručnjaka pod vodstvom Arhivanalitike, čiji je zadatak bio izučiti najbolju svjetsku praksu i regulativu te identificirati prepreke sekuritizaciji u postojećem pravnom okviru. Temeljem ove analize, rad je nastavljen u stručnim skupinama u suradnji s nadležnim državnim institucijama. Paralelno, Hrvatska udruga banka participira zajedno s predstavnicima nadležnih državnih tijela, Svjetske banke (projekt Convergence) i EBRD-a u upravljačkom odboru projekta čiji se rad zasniva na strukturiranom javno-privatnom dijalogu. Cilj ove metode inoviranja regulacije, koja se primjenjuje u Europskoj uniji, je prihvaćanje najviših stručnih standarda u skladu s najboljom praksom EU, uz kontrolu odgovarajućeg zastupanja javnog interesa. Na projektu sudjeluju domaći i inozemni pravni stručnjaci (osim Svjetske banke i EBRD-a uključeni su i eksperti Njemačke državne razvojne banke - KfW i Talijanske udruge banaka - ABI).

U okviru strukturiranog javno-privatnog dijaloga u Hrvatskoj će se po prvi put provesti i analiza regulacijskog utjecaja (engl. Regulatory Impact Assessment - RIA) prema metodologiji koju primjenjuje Europska unija. Po završetku konzultativnog procesa i analize regulacijskog utjecaja, izrada prijedloga regulacije očekuje se najesen ove godine.

### Međunarodne aktivnosti

Još od osnutka 1999. godine Hrvatska udruga banaka je razvila, a i nastavlja s tim, bogate međunarodne aktivnosti. Tako je još 2000. godine postala pridruženi član Bankarske federacije Europske unije i redovito sudjeluje u svim njihovim aktivnostima. Udruga razvija odlične i dinamične bilateralne odnose s nizom europskih udruge banaka. Također sudjeluje, a i sama ih organizira, u raznim tematskim konferencijama te na poziv drugih dijeli praktično stečena iskustva.

Lani u prosincu predstavnici udruge sudjelovali su na sastancima Europske bankarske federacije u Bruxellesu, kao i Istanbulu u svibnju ove godine, gdje

su aktivno sudjelovali u raspravama na nizu bankarskih tema. Neke su rasprave i sami potaknuli, kao npr. raspravu o percepciji banaka u javnosti, a zaključeno je kako uglavnom sve europske udruge imaju jednake probleme kad je riječ o percepciji i upravljanju reputacijom banaka i bankarskog sektora. Također, nakon provođenja studije pod nazivom Pokazatelji regulacijskog opterećenja banaka u šest zemalja srednje Europe i Hrvatskoj, koju je za HUB tijekom 2005. godine provela tvrtka Arhivanalitika, inicirano je pri Europskoj bankarskoj federaciji organiziranje Konferencije o utjecaju regulatornog opterećenja na bankarski sektor, a očekuje se da bi se mogla održati potkraj ove godine. Tema regulatornog opterećenja je iznimno bitna jer se s njom susreću gotovo sve europske bankarske udruge pa bi održavanje takve konferencije zasigurno bila dobra prilika da se u širem spektru izmijene iskustva i gledišta u vezi s tom problematikom.

U veljači ove godine izaslanstvo HUB-a boravilo je u Rimu gdje su posjetili kolege iz talijanske udruge banaka (ABI). U otvorenom i srdačnom razgovoru izmijenjena su iskustva o načinu rada, suradnji s bankama i drugim institucijama, raznim projektima i sl. Ta je prilika iskorištena kako bi se talijanske kolege upoznale s rezultatima studije o regulatornom opterećenju, za koju su oni bili iznimno zainteresirani. Razgovaralo se i o percepciji banaka, a pritom su talijanske kolege iznijeli svoja iskustva te posebno prezentirali svoj projekt Patti Chiari (jasni/čisti ugovori) kao dio koncepta društvene odgovornosti. U konstruktivnom razgovoru spominjane su i teme zaštite potrošača, upotrebe osobnih podataka i uloge kreditnog registra.

HUB su u protekloj godini posjetili i predstavnici udruge banaka iz BiH i Republike Slovenije s kojima se konstruktivno razgovaralo o temama od interesa za obje udruge, kao i o projektima na kojima se radi.

Na poziv FSVC-a (Financial Services Volunteer Corps), američke neprofitne organizacije čiji je cilj razvoj i izgradnja pouzdanog bankarskog i financijskog sustava u tranzicijskim i zemljama u razvoju, u travnju ove godine direktor HUB-a sudjelovao je kao konzultant u razgovorima između albanske središnje banke i udruge banaka o uspostavi kreditnog registra u Albaniji.

Banke članice Gospodarskog interesnog udruženja **Hrvatska udruga banaka** donose ovaj Kodeks u cilju da:

- postavbe standarde dobrog ponašanja i otvorene komunikacije prema klijentima i bankama;
- povećaju ugled bankarstva u društvu;
- promiču ideju odgovornosti, javnosti i profesionalnosti u svom poslovanju.

### 1. Opće postavke

- 1.1. KODEKS DOBRE BANKARSKJE PRAKSE (u daljnjem tekstu Kodeks) dobrovoljni je okvir kojim banke uređuju poslovanje s klijentima (pravnim i fizičkim osobama) i drugim bankama. Kodeks predstavlja vrijednosti koje banke žele prihvatiti i provoditi u međusobnim odnosima.
- 1.2. Prihvatanjem Kodeksa banke postavljaju standard dobre bankarske prakse kojega se pridržavaju kao minimuma u svom poslovanju, a tržišna utakmica i snage koje oblikuju i upravljaju tržištem poticati će banke da dosegnu što veće standarde na dobrobit svojih klijenata.
- 1.3. Kodeks sadržava osnovne elemente koje svaka banka treba imati u vlastitim internim pravilima.
- 1.4. Kodeks klijentima omogućuje spoznaje o tome kako banke postupaju u svom poslovanju te što očekivati u međusobnom kontaktu.

### 2. Načela odnosa banaka prema klijentima

- 2.1. Etično i profesionalno ponašanje
- 2.2. Primjena i poštovanje zakona i propisa
- 2.3. Čuvanje tajnosti bankarskih informacija
- 2.4. Objektivnost u poslovanju s klijentima
- 2.5. Kompetentna primjena novih znanja
- 2.6. Sigurnost i pouzdanost bankarskih i platnih sustava
- 2.7. Transparentnost naknada i troškova u poslovanju s klijentima
- 2.8. Ispravljanje mogućih pogrešaka uz brze i korektne odgovore na pritužbe.

### 3. Banka je partner u financijskom poslovanju

- 3.1. Uspješan bankarski odnos počiva na povjerenju koje se ostvaruje poštenim i otvorenim dijalogom dviju strana, međusobnim razumijevanjem i slobodom izbora.
- 3.2. Kompetentnost i znanje nužni su za postizanje partnerstva. Stoga se banka brine da stručno osposobi svoje zaposlenike i suradnike kako

bi u svakom pogledu i cjelovito odgovorili zahtjevima klijenata. Oni su ujedno upoznati s postavkama Kodeksa i upućeni u izvršavanje postavki sadržanih u njemu.

- 3.3. Bankovni zaposlenici svjesni su toga da njihov rad i odnos prema klijentima predstavlja banku u cjelini, pa njihov međusobni odnos unutar banke mora biti zasnovan na suradnji, međusobnom poštovanju i pomoći.

### 4. Bankarske informacije

- 4.1. Dobar poslovni odnos zasniva se na otvorenosti i uzajamnom povjerenju, što podrazumijeva da informacije - koje razmjenjuju banka i klijent tijekom poslovanja - trebaju biti točne, potpune i pravovremene.
- 4.2. Naknade za bankarske usluge, kamatne stope i druge informacije dostupne su u svim poslovnica. Banka se obvezuje dostavljati osnovne podatke i promjene Hrvatskoj udruzi banaka, kako bi jednoobrazno bili dostupni javnosti.
- 4.3. Bankarske komunikacije, oglašavanje i ostale marketinške aktivnosti moraju biti jasne, istinite i nedvosmislene. One ne smiju zavesti javnost, prekršiti dobre poslovne običaje ili štetiti drugima. Otvorena tržišna utakmica dopušta sva marketinška sredstva i oblike komunikacije, sve dok dane informacije ističu karakteristike poslovanja banke, prednosti u njezinoj usluzi, proizvodu ili tehnologiji, radi korektnog ostvarivanja ekspanzije na tržištu.

### 5. Zaštita klijenata

- 5.1. Poslovanje banaka ne služi samo provođenju bankarskih transakcija, jer one su sastavni dio gospodarskog i socijalnog okruženja. Zbog toga banka brani integritet bankarskog sustava u cjelini te štiti prava i interese štediša, dužnika i dioničara, jednako kao i vlastite interese i interese svojih zaposlenika. Banka je svjesna odgovornosti u osiguravanju transparentnosti i regularnosti financijskih tokova.
- 5.2. Svi podaci o bančini klijentima i o poslovnim partnerima, kao i vrijednosni sudovi stečeni radom s klijentima, smatraju se bankarskom tajnom, čak i kada prestane status klijenta. Svi osobni podaci, kao i podaci o računima klijenta, ne smiju se otkriti nikome, uključujući i tvrtke koje pripadaju istim vlasnicima, osim u slučajevima koji su jasno određeni zakonima, zatim na izravan zahtjev klijenta ili uz njegov izričiti pristanak.
- 5.3. Podacima o klijentu i njegovim računima banka se služi samo da bi



omogućila učinkovito upravljanje njegovim računima i ostvarivanje usluga koje mu pruža. Klijent ima pravo pristupa svojim podacima radi provjere i eventualnog ispravljanja netočnosti.

- 5.4. Radi zaštite klijenta i poštivanja propisa Hrvatske narodne banke, za pojedine transakcije, uključivo i otkrivanje osobnih podataka i podataka o računu, potrebna je nedvosmislena identifikacija klijenta.
- 5.5. Bankovni informatički sustavi trebaju biti posebno zaštićeni od nedopuštenog pristupa u banke podataka, radi zaštite interesa banke i klijenta, kao i svih podataka.
- 5.6. Kada klijent uoči pogrešku u poslovanju s bankom i o tome izvijesti banku, banka će nastojati u razumnom roku provjeriti navode i bez odgađanja ispraviti pogrešku. Ako je potrebno određeno vrijeme za provjeru navoda, učinit će sve potrebno kako bi se u međuvremenu poduzela privremena mjera na obostrano zadovoljstvo. Banka internim pravilima određuje postupak podnošenja i način rješavanja pritužbi klijenata.
- 5.7. U slučajevima financijskih teškoća klijenata banka će, vodeći računa o svojim interesima, nastupati kao partner te kao prvi korak iskazati spremnost na razgovor. Od klijenta se očekuje da svoju poslovnu banku što prije izvijesti o tekućim i mogućim budućim teškoćama. Na taj način mogu se izbjeći poremećaji u poslovanju, a oni već nastali pravodobno otkloniti. Banka je partner klijentu i samo uz njegovu punu suradnju moći će ponuditi kvalitetan plan konsolidacije, sukladan s obostranim interesima.

## 6. Odnosi između banaka

- 6.1. Banke se u međusobnim odnosima pridržavaju svih važećih propisa i pravila kao i u poslovanju s drugim poslovnim subjektima, s posebnim naglaskom na zaštiti interesa bankarske struke i korektnost u odnosima i provođenju poštene tržišne utakmice, vodeći pritom računa o čuvanju dobrog ugleda drugih banaka.
- 6.2. Ako banka potpisnica Kodeksa dođe u teškoće, izgubi povjerenje ulagača ili se nađe u teškoj poslovnoj situaciji, negativne posljedice osjetit će sve banke kao i bankarska industrija u cjelini. Budući da su sve banke - koje su usvojile Kodeks - prihvatile postavke dobre bankarske prakse, svaka je banka spremna pružiti drugoj banci potpisnici Kodeksa pomoć, na njezin zahtjev, poduzimajući pritom sve mjere da sačuva povjerenje klijenata, kao i svoje poslovne interese.

- 6.3. Ako se pojave problemi ili nesuglasice između banaka koje su prihvatile Kodeks, banke se obvezuju da će uzastojati naći rješenje konstruktivnim dijalogom, temeljenim na principima dobre bankarske prakse. Ako direktni dijalog dviju (ili više) strana ne dovede do rješenja, banke će pokušati spor riješiti posredovanjem Hrvatske udruge banaka.

## 7. Prijelazne i završne odredbe

- 7.1. Ovaj Kodeks stupa na snagu 1. siječnja 2001. godine, a sve članice Hrvatske udruge banaka uskladit će svoje poslovanje s njegovim odredbama do 1. srpnja 2001. godine.
- 7.2. Također, sve banke u Hrvatskoj bit će upoznate s Kodeksom, a prihvaćanjem njegovih odredbi moći će primjenjivati Kodeks dobre bankarske prakse u svom poslovanju.
- 7.3. Izmjene i dopune Kodeksa provode se na inicijativu bilo koje članice Hrvatske udruge banaka, a moraju ih jednoglasno prihvatiti sve članice da bi stupile na snagu 30 dana nakon prihvaćanja.
- 7.4. Tekst Kodeksa dostupan je javnosti na Internet stranicama Hrvatske udruge banaka: <http://www.hub.hr>.

## 8. Potpisano 27. studenog 2000. godine u Zagrebu



# Together, we...

:: promote banking interests in Croatia :: protect reputation and professionalism of banker's occupation :: enact general banking principles and regulations implementation :: raise the standard of banking business :: coordinate standpoints crucial for sound and stable business transactions, :: represent views before state bodies and institutions :: facilitate new knowledge dissemination and new techniques implementation :: cooperate with businesses toward country's advancement :: encourage development of resources in banking :: strengthen the Croatian banking reputation through international contacts :: reinforce our clients' trust in banking



#### About us

In the course of 2005 and in the first half of 2006, the **Croatian Banking Association** (CBA) has continued to work on its goals for which it was established on 15 October 1999 as an association of the banking industry in Croatia. Thirteen banks signed the Agreement on Establishing the Croatian Banking Association, setting up the main goals of the Association: protect, defend and promote

the general interests of the entire banking system, encourage the development of human resources in the banking industry, promote professionalism and consistency in the implementation of general principles of banking, public and transparent activities of the member banks and raise the banking business standard in Croatia, and in that manner, bring the Croatian banking system closer to European Union standards. By joining the Croatian Banking Association, the member banks agree to respect the principles of the Association, especially the transparency and consistency in business dealing, based on the generally accepted ethical, professional and other standards of the profession, applying the good business customs and banking practice, and using the top standards for maintaining the reputation of the profession in the eyes of the public and clients.

Starting from its thirteen members, which at the establishing accounted for three fourths of the overall banking assets in Croatia, currently there are seventeen member banks with 96% share in the total assets. In early 2006, Hrvatska poštanska banka, the largest non-member, joined the Association so that CBA currently has thirteen largest banks by assets.

The Annual Assembly of the CBA was held in November 2005 in the Golden Hall of the History Institute on Gornji grad in Zagreb. After the working session of the Assembly, the members of the Assembly and guests from the major financial institutions (Croatian National Bank, Ministry of Finance, Office of the President, Economic Institute, Croatian Employers' Association), were presented with three current topics on which the CBA worked in the preceding year and which are described in details among the CBA projects:

- new legal provisions required for the development of financial markets, with special reference to securitisation;
- prospects of future trends in banking regulatory costs, with special reference to the approximation to the EU legislation;

- influence of the credit registry on banking and economy in general, following the establishing of the Croatian Registry of Credit Obligations (HROK).

Since its beginnings, the CBA has been working on all given goals solely as a result of hard work and support of the **member banks**. Banks have recognized the power of common action and due to that, our Association has become and will remain a key factor of the banking system stability, working permanently on strengthening of the basic foundation of banking - client's **trust in the banks**. The working bodies of the CBA (committees and task forces) have held dozens of conferences and meetings with other institutions, and over a hundred outstanding banking experts who have attended, have helped with their knowledge and experience in fulfilment of the goals of the Association.

#### Projects of the Croatian Banking Association

In late 2005, a wide project was completed in which CBA takes a part in it as the main, but not the only party: "**Development prospects of the non-banking financial agencies and capital market in Croatia**". The final material will serve for a better understanding of the role of the globalization processes in the professional and political circles and the key position of financial institutions and market in that process, better understanding of the basic EU regulations and of the best method of formal and real convergence with the EU standards, with the beginning of the affirmation of the principle of partnership of the private and public sectors, and a process of consultations in the revision of the regulations. The entire project has been published in the book "The Missing Link", and some parts, such as the Section on Securitization, have served as the basis for the start of the incentive for drafting of the necessary regulations for the development of such banking technique. The member banks have accepted the project management jointly with the partners from the government and private sector, aiming to have a view of the status and possible solutions by mid 2006, and after that to decide on the second stage - implementation.

In mid 2005, a study "**Indicators of regulatory burden on banks in the six countries of the Central Europe and Croatia**", was ordered from "Arhivanalitika" consulting company. We hoped that its conclusions (published

on the website as well) will serve to open a dialogue with the regulatory institutions and provide them with methodology for relaxing of the existing regulations in Croatia. Reasons have been explained which led to higher regulatory costs than in the neighbouring countries, and as part of the accession to the EU, the time has come to reduce the burden as our system is sufficiently developed, safe and stable.

As an upgrade to the Information Exchange System (IES) on bad debtors, established by the CBA as a concrete support to member banks for better management of credit risks, the Executive Board decided to establish a "full" credit registry in Croatia - **Croatian Registry of Credit Obligations (CROC)**. The Articles of Incorporation were signed by 20 Croatian banks, and after all the legal and administrative formalities were made, HROK d.o.o. (CROC Ltd., [www.hrok.hr](http://www.hrok.hr)) was entered in the register of the Commercial Court at the beginning of 2005.

#### Activities

Within the scope of its activities, the Croatian Banking Association also cooperates with a range of other institutions, particularly with the two most important institutions in the Croatian banking industry - the **Croatian National Bank** and the **Ministry of Finance**. We participate in drawing up of laws, regulatory acts, implementation provisions and other regulations on banking and finance industry. Such cooperation, on one hand, leads to the adoption of quality regulations, because it gives an insight into the feasibility of the regulations to those who have brought it, and on the other hand enables the banks to present and discuss their voice and interests in the early stage of adoption, so the parties who proposed the regulation could bring the best decisions in the interest of the Croatian financial system stability. In cases when the regulatory measures are not to the interest of banks, or even cause a direct damage, CBA tries to consider all reasons and to start discussion with expert argumentation, in order to change or moderate the effects of such measures.

Besides the formal participation in the **National Payment System Committee**, founded at the initiative of the Croatian National Bank, and the **Interest Rate Determination Committee**, founded in accordance with the Law on Interest Rates, the CBA also participates in all the other task

forces convened by those two institutions on a permanent or ad hoc basis. On operational basis, the CBA representatives participate in the **Committee of Participants in the National Clearing System (NCS)** under the leadership of the **Croatian Financial Agency (FINA)** and also in the **Coordination Committee of the Task Force for Cash Centres**, with the aim of establishing cash centres in accordance with the CNB's regulations, and in cooperation with other banks, the rationalization of the current system of cash handling in Croatia, together with infrastructural development, which will considerably increase the banking standards. In late 2005 and in the first half of 2006, the activities have been intensified and additional efforts have been invested in order to find the best long-term solution for the Croatian cash market and similar services.

Through a collective membership in the Croatian Employers' Association (HUP), as a non-voting member, we participate in the work of the **Croatian Committee on Finance and State Budget** of the Croatian Parliament, where we have an opportunity to present the standpoints of the banking industry and economy in general, for all bills and other topics discussed at the Committee's sessions. Along with the Croatian Employers' Association and three chambers (Croatian Chamber of Economy, Croatian Chamber of Crafts and Trade and Croatian Bar Association), the CBA has founded the **Croatian National Committee of the International Chamber of Commerce (ICC)**, and the director and the president of the CBA's General Assembly are by definition also members of the Executive Board of ICC Croatia.

In accordance with its mandate, the Croatian Banking Association actively participates in a series of other projects and contacts with Croatian and foreign organizations, providing information on Croatian banking, answering the proposals and questions, connecting the interested institutions with our member banks, or other Croatian institutions. The initiative examples, where CBA works on creation of actual banking projects, are the UNDP's project (United Nations Development Programme) on the banks' social responsibilities and USAID's project (United States Agency for International Development) on mortgage finance in the countries of the Eastern Europe.

Some of the concrete results of the CBA's work for the previous year are the introduction of the IBAN standard (International Bank Account Number) in Croatia; negotiating a new tariff structure of the National Clearing System

(NCS); cutting the deposit insurance premium; major changes in the foreign payment system.

#### Working methods

The main body of the Croatian Banking Association is its Executive Board, which once a month gathers the presidents and the members of the Management Boards of all major banks and brings all strategic decisions and procedures for the future actions of the CBA. In accordance with the Agreement on establishing of the CBA, some minor banks also have several representatives in the Executive Board for equal participation in the adoption of major decisions. We find very important the active contribution of the leading people of the Croatian banking, as otherwise it would be very difficult to run the Association along its path and work on the issues of common interest of the Croatian banking industry.

More about the activities of each Committee of the Croatian Banking Association can be found below, as well as on our web site [www.hub.hr](http://www.hub.hr). Now, I wish once again to thank the member banks of the Croatian Banking Association for their cooperation, time and support, as well as our associates, without whose eagerness and openness we would not be able to achieve such results. With special thanks to the presiding people of the CBA's Committees, who worked on the preparation of the texts about the Committees' activities, I will mention in short the activities of some working groups of the CBA.

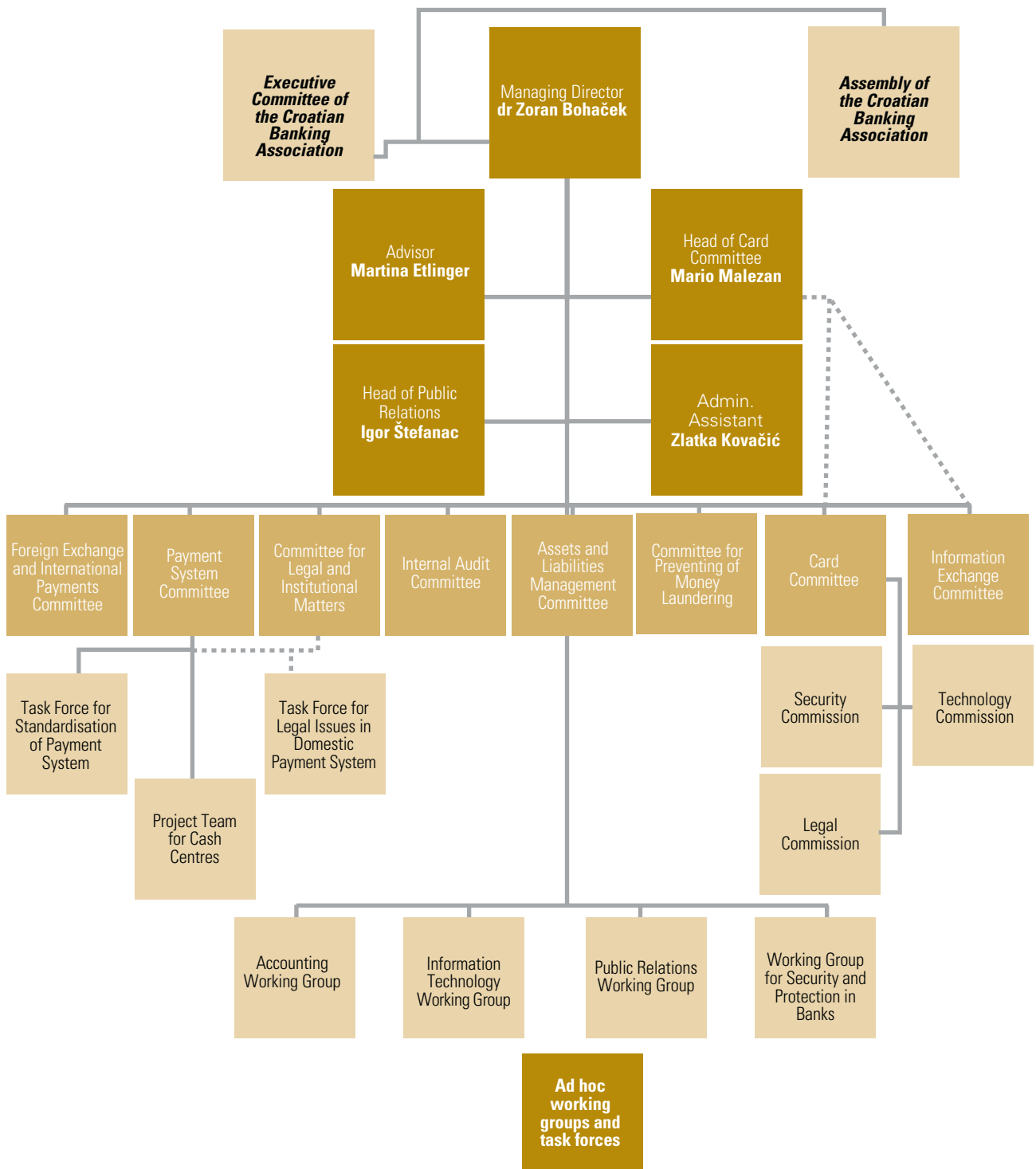
The **Working Group for the Security and Protection in Banks**, besides its regular meetings and cooperation with the Ministry of Internal Affairs (which is confirmed also by the presentation of annual CBA reward to the members of the police force, for solving the criminal acts against banks), participated also in the lobbying preceding the amendments to the Law on Minimum Protection Measures in Transactions with Cash and Valuables. Although the Law is, in our opinion, superfluous, after its adoption, the talks continued with the Ministry of Internal Affairs concerning the implementation of the Law which took effect on 1 July 2006 aiming to make possible to all the banks to provide primary efficient protection to their clients and employees, and at the same time to comply with all the applicable laws and regulations.

In order to strengthen our cooperation with the Croatian National Office for Prevention of Money Laundering, our Working Group for Prevention of Money Laundering has grown into the **Committee for Prevention of Money Laundering** providing regular cooperation and consultations with the Office. Delegation of the Committee immediately joined the dialogue with the Office in order to clarify specific rules of work, and in the autumn we expect the start of drafting the new Law on Prevention of Money Laundering, agreed with the highest EU standards.

My special thanks go to a small, but brave CBA team, for without their efforts to conduct all our activities in the best possible way, we would not be able to make our banking and other partners view our **Croatian Banking Association** as a reliable partner, associate and support in their ideas and initiatives. Thank you, Martina, Zlatka, Mario and Igor!

Zoran Bohaček  
Director





#### Foreign Exchange Committee

The establishing of the **Foreign Exchange Committee** was approved by the Executive Board of the CBA in 2002, but its founding was not formal until 2004, when its president and deputies were appointed and the Rules of Procedure adopted.

In late 2005 and in the first half of 2006, the Committee primarily discussed the legislation adopted by the Croatian National Bank related to the Law on Foreign Exchange Operations. Although the legislation was expected to bring significant liberalisation of operations, some more time is required for the Croatian banking operations to loose the elements remaining from previous period, particularly those that refer to banking control function. However, it must be said that some positive shifts have been done by the relevant institutions - Croatian National Bank and Ministry of Finance.

Of special importance for the Committee was the dialogue with the Croatian National Bank, so that in the course of preparation of certain legislation, the Croatian Banking Association asked on behalf of banks to be able to comment the drafts. The banks had the opportunity to point out via the Committee to the possible doubts in the implementation. Their representatives had many practical questions. As the legislation encompasses in detail transactions toward abroad and from abroad, there were many questions and comments, and the Croatian National Bank from its top management to its specialised professionals, provided replies and guidelines. Although the interventions in IT support were significant, communication with the CNB concerning all aspects of implementation of regulations was of exceptional use for the preparation of the banks as well as for appropriate understanding of the subsequent amendments to the legislation.

Regulations - **Decision Governing the Conditions and the Manner of Performing External (International) Payment Operations and the Directions on the Implementation of the Decision Governing the Conditions and the Manner of Performing External (International) Payment Operations** were of essential importance for the Committee operations in the last year. However, the Committee also discussed other issues, such as the use of IBAN (International Bank Account Number) and banks have adjusted their IT support for the issue of IBAN.

In the forthcoming period, due to the synergies of domestic and international payment transactions, and in the context of joining the EU, it is obvious that the **Payment System Committee** (domestic) and the **Foreign Exchange Committee** will grow into a single body, with task forces, or will be organised in another way, for their better functioning.

The synergies are seen also through the **Task Force for Standardisation of Payment System**, established by the Payment System Committee.

The task force used to work on issues concerning domestic payment system (payment order form and alike) and now it gathered members from both domestic (Kuna) and foreign exchange payment system. Joint banking experts from the two payment segments (domestic and international) have drafted and accepted the **Recommendations on Proceeding in External Payment Transactions - International (Foreign Exchange) and Domestic (Kuna) Collections and Payments**. Recommendations were intended to banks and they form a standard in proceeding with the specific forms of transactions. Their aim was to make methods of proceeding not covered by legislation and required for prompt and accurate implementation of transactions and cutting the expenses both for the banks and for their clients.

#### Payment System Committee

Since its foundation in 2002 until now, the Payment System Committee has been very active in resolving numerous open issues and problems for a more efficient functioning of the national payment system, as the new banking product at that time.

Thus, in the period from the preceding report, the Committee has been engaged in resolving certain specific issues of the national payments system such as:

- via Council of Participants in NPS, it managed to exert influence on FINA (Financial Agency) and the Croatian National Bank concerning a more transparent pricing of NPS services, where fees concern the number of transactions and not the number and amount of transactions, and the price varies considerably based on the cycle of implementation. The new price list is applicable as from 1 July 2005 and its effect has been a reduction in costs for the users;
- based on the Law on Amendments to the Execution Law, the Committee has agreed on the banks' proceedings with the bases for payment (blockades), as the provisions of the Law on Amendments to the Execution Act have not been harmonized with the provisions of the Law on National Payment System

Harmonisation of the Croatian laws with the EU laws, national payment system and foreign exchange payment system have been more and more connected on the way to a multi-currency account. Therefore in the preceding period the Task Force for Standardisation of Payment System has been very active. The Task Force determined the banks' proceedings in accordance with the new Decision on Foreign Exchange Payment Transactions and resolved the standardisation of payments via "collection" and "payment" banks through national payment system channels.

In the last year, the most active part of the Payment System Committee was the Task Force for Cash Centres. Its establishing was a consequence

of dissatisfaction on the part of banks members of the Croatian Banking Association with the Financial Agency services in the field of cash operations and in particular with the price of the service that was too high both for the banks and for their clients.

In the last year, the Task Force worked on:

- establishing a model of the possible structure of cash centres owned by the banks
  - cost-benefit analysis of possible structural models
  - analysis of existing banks' capacities, potentially available for cash centres
  - evaluation of required investments for the establishing of cash centres
- Besides, a "Request for Proposal" has been sent to a number of leading companies engaged in cash operations in Europe as well as to the Financial Agency to participate in the formation of cash centres according to three participation models. Two offers have been short-listed for further discussion and determination of possible ownership structure of future cash centres. The starting of cash centres will remain the most significant and priority project of the Committee for 2006.

**Task Force for Legal Issues in Domestic Payment System** established by the Payment System Committee, has met several times, discussing the **novelties of the Execution Law**, primarily the order of implementation of payment bases according to the novelty in comparison with the preceding law, in order to avoid - disturb the order of payment bases. Such problems occur because some laws allow various interpretations, and the opinions of competent bodies, even when given to banks, do not have the force of a law.

#### Committee for Legal and Institutional Matters

**The Committee for Legal and Institutional Matters** starts initiatives of interest to legal structures in the CBA member banks, gives proposals to the Executive Board and other CBA bodies, provides opinions and recommendations concerning the issues of legal scope proposed by the Executive Board or other CBA bodies.

In the course of 2005/2006, the Committee for Legal and Institutional Matters has dealt with the issues within the scope of the Civil Obligations Law, in particular its provisions governing interest on interest, regulations governing the safety of personal information, remaining issues of transfer of **foreign exchange deposits into the Croatian public debt for old foreign exchange saving** (Law on Conversion of Citizens' Foreign Exchange Deposits into Croatian Public Debt), and the need for explanations of the Law on Personal Property and Other Property Issues, particularly provisions which are unclear in relation to the implementation of the Law on Banks, so that probably the legislator will be asked for explanation for some of those issues.

Members of the Committee or representatives of the banks delegated by them, participated in several meetings, such as that in the Ministry of Justice concerning the digital land registers. The Committee pointed out to specific difficulties related to the application of the Law on **Amendments of the Law on Land Registry**.

In addition, representatives of legal experts from banks attended the meeting with the representatives of the Ministry of Justice and external experts in charge of the Technical Assistance Project related to bankruptcies and provided their view of the bankruptcies of both banks and companies.

Members of the Committee for Legal and Institutional Matters have exchanged their opinions which specific banks obtained from competent institutions considering significant issues for banking operations and such an exchange on the professional level has been found positive.

#### Assets and Liabilities Management Committee

The Assets and Liabilities Management Committee deals with all the issues in the field of assets and liabilities management and its members are, as a rule, banks' treasury managers.

A frequent topic is the analysis of measures in the field of central banking operations of the Croatian National Bank and any other decisions affecting the banking operations on both domestic and international financial markets. Along with its reactive role, the Committee also regularly plays a proactive role with its incentives directed towards the development of new instruments on the Croatian banking market (as well as initiating dialogues with the regulatory bodies) or aiming to explain specific regulations (asking for interpretations or amendments in cases when those regulations are not in compliance with the best professional practice).

In addition to the dialogues with the Croatian National Bank (CNB) and the Croatian Securities Commission (CROSEC), on the operative level the Committee cooperates with all other institutions such as the Central Depository Agency (CDA), Zagreb Money Market (ZMM) and the Varaždin and Zagreb Stock Exchanges.

In the course of its work on the project "**Indicators of regulatory burden on banks in the six countries of the Central Europe and Croatia**", the Committee as a professional authority, discussed the proposed methods and presented the proposals and ideas based on which the study was conducted and concluded with success. Within the scope of its another project in cooperation with the Arhivanalitika Company - "**Development Prospects of Financial Agency Services in Croatia**", the Committee was directly involved in the chapter concerning the issues of development



of securitisation operations in Croatia, and its members participated in the other chapters of the project, on as needed basis.

The reference indicators **ZIBOR** (Zagreb Interbank Offered Rate) and **ZAGREB FIXING FOR BONDS** have been announced within the framework of the Croatian Banking Association since mid 2002 as agreed with and under coordination and supervision from the Assets and Liabilities Management Committee of the Croatian Banking Association. In early 2005, the regulations for these indicators were changed and the incentive was made for a better technical implementation of quotations and calculations.

**ZIBOR** (Zagreb Interbank Offered Rate) is a unique reference offered interest rate for Kuna (HRK) on the Croatian interbank market reflecting the average rates of the referential Croatian banks for deposits in Kuna based on internationally recognized maturities, ranging from overnight borrowings up to 6-month loans.

**ZAGREB FIXING FOR BONDS** has been designed as a benchmark or reference indicator for the prices of Croatian bonds on the domestic fixed income market. The list of bonds has been defined by the most active banks on the market ("market makers") which in this way, by regular daily contributions and announcements of bid and ask quotations of the prices of specific bonds, contribute to a more transparent and more liquid market and make possible its further development. In addition to providing as transparent information from the domestic capital market as possible, the aim of the fixing is to be a unique benchmark for the portfolio evaluation.

The Committee is considering the possibilities of establishing the other reference indicators that would assist the banks and other involved parties in working with the financial market instruments.

Based on the Committee's decision, the Croatian Banking Association will announce in public the standardised repo agreement between its member banks.

#### Internal Audit Committee

Within the last few years, technology of operations in banks experiences significant changes. As a result, there emerges a need to establish new methods of managing risks in daily operations and redesigning current internal audit systems. Internal audit in banks have an assignment to observe these changes and through specific methods detect weaknesses in established control check-points chain.

Due to own insights and partially due to impetus from the international community, Croatian banking regulation framework is changing and in its

extensiveness is related to the set of practical issues. So that internal audit would perform all tasks stemming from international standards and the Banking Law, on Committee sessions, most attention was put on discussing implementation particular sub-acts, as they are sometimes incomprehensible, and therefore problematic to implement. Such issues dominated all Committee sessions, since its establishment in 2001. Still remains current the issue of coordinating internal audits within a group of legal entities (companies), together with a topic of competence and assignments of internal audit of owner-bank ('mother-bank') in relation to other group members.

Priority of Committee's work for the following period was defined as well. Namely, in a sense of developing methods to detect risk and weak points in internal control, a need to improve auditing skills and keeping educational series on topics such as IT audit and treasury audit. Mentioned two topics were selected as first ones in a set of educational series and seminars which are to be organized by the Committee, that is, through the Association.

#### Card Committee

Members of the Card Committee are the principal members of MasterCard International and VISA: Zagrebačka banka d.d., Privredna banka d.d., Erste & Steiermarkische bank d.d., Splitska banka d.d., Raiffeisenbank Austria d.d., Hrvatska Poštanska Banka d.d., Slavonska banka d.d., Hypo Alpe-Adria Bank d.d., as well as the card companies: PBZ American Express d.o.o. and Diners Club Adriatic d.d.

Other banks operating with card products participate in the Committee as affiliates of the banks - principal members.

The activities of the Card Committee cover the non-competitive fields of card operations at the level of MC, VISA, AmEx and Diners brands, such as: security, technology and law.

The Committee encompasses the following commissions:

- Security Commission;
- Technology Commission;
- Legal Commission.

In the preceding year, the Committee was engaged in the issues of amending the Penal Code in the field of card business, participation of card departments in the Information Exchange System (bad debtors' list), defining security standards, as well as new types of card fraud and abuse.

As regards the amendments to the current Penal Code, it has been recognized that the current Criminal Code does not sanction the offences in the field of card business in an appropriate way and in the course of 2005 cooperation was established with the Ministry of Justice, Administration and Local Self-Government and the State Attorney's Office aimed to include

these issues in the Act on Amendments to the Penal Code. The aim of the Committee and the Ministry's Task Force for Amendments to the Penal Code is to harmonize the Penal Code with the EU legislation governing fraud and abuse with non-cash payment means.

As for increasing security of card operations, the Committee has undertaken a number of activities. In order to secure the ATM network, banks have installed images on ATM monitors directing clients to check whether the card slot appearance is original and a drawing directing them to hide their PIN entry.

The next measure aimed to increase security is participation of the banks' card departments in the Information Exchange System which is used to exchange a bad debtors' list (physical persons) among the banks. The lists are formed and exchanged near the end of a current month in accordance with the agreed criteria on a monthly basis.

Replacement of magnet stripe cards with chip cards has provided an opportunity for a significant increase of security in card operations by the introduction of PIN on chip credit and charge cards, which will significantly reduce certain types of fraud and abuse.

The security in card business will be improved also by security standards for our market stimulating traders to detect forged cards and certain types of fraud, while updating of MCC will provide more precise monitoring of traders' activities.

#### Information Exchange Committee

In the course of 2005, the Information Exchange Committee has continued the successful exchange of information concerning bad debtors among the banks participating in the IES.

Participants in the information exchange are obliged to act responsibly and to apply all measures for the protection of security and confidentiality of the information, in accordance with the laws and internal bylaws. It has been anticipated that the exchange of information via

IES would last until the Croatian Registry of Credit Liabilities is established.

The first effects of the exchange have already been noticed in the increased discipline in fulfilling credit obligations and the collection of certain credit products that were on the verge of dubious has improved. Finally, the establishing of the information exchange will be of most advantage to clients as banks will eliminate potentially bad credits thereby reducing their risks and will be able to provide **more of, better and more affordable** credit products (higher amounts, with simplified procedure, and at lower interest) to debtors with good standing.

## Projects

### About HROK

We are pleased to say that the project of establishing a credit registry in Croatia has reached its final stage. This year already HROK will start providing its first credit reports at the request of its users, which will bring Croatia closer to the contemporary financial states which have been using such systems for a number of years.

HROK has been operating as a company since February 2005. At that point was the start of negotiations concerning the licence agreement with TransUnion - Crif (TUC) signed before summer 2005. The agreement provided very favourable terms for obtaining the state-of-the-art TUC iCRS (International Credit Reporting Service) system, with all the anticipated updates and supplements, as it will continue to develop and be updated in about fifteen countries where it has been in function. Decision on this system has been a strategic decision of Croatian banks, which decided to purchase the best possible system due to its reliability, safety and data protection.

HROK has in the meantime grown, both in terms of personnel and in view of technical resources. HROK has purchased and installed the latest IT equipment. In mid February 2005, the representatives of TUC came to Zagreb and, in accordance with the plan, helped in the establishing of the first system version and thus made possible its local testing. Also, in a number of meetings with the technical and business committees of HROK, they answered all the questions that appeared in the course of work on the project.

In the final stage, before the start of operation, after the register base is filled in for the first time, the functioning of the system will be monitored to check whether any improvements are required in order to have things in best order at the moment when first reports are delivered. We hope that things will go as planned in that phase and that we will very soon be able to see the full advantages of the credit registry which has been, as we have already mentioned, known in the developed financial world for a number of years.

### Workshops for citizens

#### Personal Finance Management

An initiative proposed by the **United Nations Development Programme (UNDP)** to banks and the Croatian Banking Association, with the support of the Executive Board of the Croatian Banking Association, has soon grown into a project, as banks have recognized the willingness and the need to contribute to the community in this way as well, by free education of the clients - citizens

- and thus to contribute to the already recognized social responsibility concept.

In June, July and September this year (2006), free education workshops for adult citizens will take place in Zagreb under the name **"Personal Finance Management - How to Harmonize Revenues and Expenses"**, led by the banks' representatives in cooperation with CBA and UNDP.

Actively involved in the workshops are 6 member banks (Hypo-Alpe-Adria Bank, Erste&Steiermaerkische Bank, OTP banka, Privredna banka Zagreb, Slavonska banka and Volksbank), and we expect that the pilot project will help in informing citizens and making possible high-quality informed decisions concerning financial issues met in daily life - short-term and long-term objectives, capacities and desires in the context of the existing revenues and expenses. Other members of CBA have also participated in the preparation of the workshops.

The location selected for the pilot project is Zagreb. In later stages, we expect the participation of more banks, as well as the expansion to all the regions of Croatia, based on the conclusions and feedback obtained in the course of the pilot project from those attending it as well as from representatives of the banks involved in the project.

Thus, for the first time in Croatia, banks have **jointly**, and in cooperation with other entities, drafted a program of free workshops for citizens to train them to manage their own finance on long-term sustainable basis and to better understand the banking and finance terms. The project of CBA and of the banks is focused on the client and the bank's responsibility for as transparent and as long-term sustainable mutual relation as possible. Preparations for the project were made by two joint teams from banks: the first one consisted of experts for retail banking and its task was to draft the program and materials for the workshops, and the other consisted of communication experts, who made out the communication strategy for the project. The teams consisting of human resources management experts and experts for development of new products have also been convened occasionally in order to resolve specific issues. In addition to direct influence on citizens' financial behaviour, the project will also affect the entire area of socially responsible operations in Croatia, as it will for the first time demonstrate the advantages of this engagement: strengthening the innovation and development of new products, influence on reputation, and development of human capital.

**Partnership with UNDP** and cooperation with other associations of civil society, such as the consumers' association "Potrošač" have strengthened and introduced new forms of communication with participants and citizens - and these are additional doors opened by the banks towards the community in which they operate.

#### Indicators of regulatory burden on banks

In the course of 2005, on the initiative and with the support of the Croatian Banking Association, the company „Arhivanalitika" conducted the first comparative study about the banking regulatory costs in Croatia and six Central European countries: Austria, Italy, Hungary, Czech Republic, Poland and Slovenia. The study has been repeated and the calculations were updated in early 2006, based on the data from December 2005.

Analysis of the banking regulatory costs provides an exact and comparable indicator of the banking regulatory costs in Croatia and the selected countries. At the same time, it is an instrument for the process of simulation of the regulatory impact on the operating costs whenever there are changes or introduction of the new monetary and foreign currency policy measures. The methodology of calculations provides a framework for a constructive dialogue between the regulators and the banking industry. This is particularly due to the fact that the methodology is used to quantify the social benefits of the regulation so that the indicator of the regulatory burden aims to measure the *net cost* of the banking regulation. The first results have shown the amount, trends and the international comparison of the regulatory costs for the banks in the observed group of countries, showing the proportionate amount of these costs in Croatia.

Results have been presented on various international forums and have provoked interest of the European Banking Federation and the World Bank Convergence Program for the financial development in the South-Eastern Europe.

#### Regulatory framework for securitisation operations in Croatia

Some financial operations which are customary on the international markets are impossible in Croatia due to excessive regulatory risks. One of them is definitely securitisation. There are uncertainties about the regulatory provisions and the way of their application to the specific elements of such financial transactions. For that reason, the opportunities are lost for a more favourable terms of obtaining the capital for the investments by business entities and the government itself,

and for spreading the range for investments by the Croatian institutional and private investors into securities, and the risk is created that, after the forthcoming liberalisation of the international capital flows, Croatian financial assets are securitised abroad. Having in mind these development restrictions, the Ministry of Finance has in its plan for 2006 drafted the proposed regulatory framework for securitisation in Croatia.

Due to the complex and specific nature of securitisation transactions, the Croatian Banking Association has formed an expert team led by "Arhivanalitika", with the task to study the best global practice and regulations and to identify the obstacles to securitisation in the existing legal framework. Based on the analysis, the work continued in expert teams in cooperation with the government institutions. Parallel with that, the Croatian Banking Association has been participating, together with the representatives of government bodies, the World Bank (Convergence Project) and EBRD in the Governing Board of the project basing its work on the structured public-private dialogue. The aim of this method of innovation to the regulations, applied in the European Union, is the acceptance of the highest professional standards in accordance with the best EU practice, with the control of the appropriate representation of public interest. Working on the project are Croatian and international legal experts (along with the World Bank and EBRD, experts of the German National Development Bank - KfW and the Italian Banking Association - ABI are also involved).

Within the framework of the structured public-private dialogue, a Regulatory Impact Assessment (RIA) will be conducted in Croatia for the first time, according to the EU methodology. Upon the completion of the process of consultations and the regulatory impact assessment, the drafting for the regulations is expected in autumn 2006.

### International activities

#### International activities

Since its establishing in 1999, the Croatian Banking Association has developed numerous international activities. Thus, already in 2000 it became a joined member of the EU Banking Federation and a regular participant in all their activities. The Association has been developing excellent and dynamic bilateral relations with a number of the European banking associations. It has also been

not only a participant but also the organiser of conferences concerning various specific topics and sharing its practical experiences at others' request.

As for its activities in the preceding year, representatives of the Association attended the meetings of the European Banking Federation in Brussels in December 2005 and in Istanbul in May 2006, where they actively participated in discussions concerning a number of banking topics. They even opened some discussions on their own, such as that concerning the public perception of banks, which led to the conclusion that almost all European banking associations have similar problems concerning the perception and

management of bank and banking sector reputation. Also, as the study named "Indicators of regulatory burden on banks in the six countries of the Central Europe and Croatia" was conducted for the Croatian Banking Association in 2005 by the Arhivanalitika Company, the European Banking Federation initiated the Conference on the effects of regulatory burden on the banking sector, which is expected to take place in late 2006. The issue of regulatory burden is very significant as almost all the European banking associations are facing that problem, and such a conference would definitely be a good chance to exchange the experiences and views of that issue from a wider perspective.

In February this year, representatives of the Croatian Banking Association visited their colleagues from the Italian Banking Association (ABI) in Rome. In open and pleasant discussion, they exchanged experiences concerning their methods of work, cooperation with the banks and other institutions, various projects, and alike. They used the opportunity to introduce their Italian colleagues with the results of the study concerning the regulatory burden, which the latter were exceptionally interested in. They talked about the perception of banks, where the Italian colleagues presented their opinions and in particular their project "Patti Chiari" (clear contracts) as part of social responsibility concept. In a constructive conversation, they mentioned the issues of consumer safety, use of personal information, and role of credit registry.

Last year, the Croatian Banking Association was also visited by the representatives of banking associations from Bosnia and Herzegovina and the Republic of Slovenia, with whom they had constructive discussions about topics of mutual interest as well as on the projects which are still in progress.

At the invitation of FSVC (Financial Services Volunteer Corps), a US non-profit organisation, whose aim is to develop and build up a reliable banking and financial system in the countries in transition and developing countries, in April this year the director of the Croatian Banking Association participated as a consultant in the talks between the Albanian central bank and the banking association on the starting of a credit registry in Albania.

Banks members of the **Economic Interest Grouping Croatian Banking Association** present this Code in order to:

- set standards of good conduct and open communication amongst banks and towards customers;
- increase the visibility and the reputation of the banking industry;
- promote responsibility, transparency and professionalism in the banking business.

### 1. General principles

- 1.1. THE CODE OF GOOD BANKING PRACTICE (referred to as Code in further text) is a voluntary framework by which banks regulate their business transactions with clients (individual and corporate) and other banks. The Code represents values that banks wish to accept and implement in their relations.
- 1.2. By accepting the Code banks set standards of good banking practice as a minimum to be maintained in business transactions. Competition and market conditions shall stimulate banks to achieve higher standards to the benefit of their clients.
- 1.3. The Code consists of basic elements that each bank should include in their internal rules and regulations.
- 1.4. The Code enables clients to become aware of methods by which banks conduct business transactions and to know what to expect when dealing with banks.

### 2. Principles of bank relations towards clients

- 2.1. Ethical and professional conduct
- 2.2. Application and respect of laws and regulations
- 2.3. Confidentiality of banking information
- 2.4. Objectivity in business transactions with clients
- 2.5. Competent usage of know-how and technology
- 2.6. Security and reliability of bank and payment systems
- 2.7. Transparency of banking fees and expenses
- 2.8. Quick and accurate correction of possible errors

### 3. Bank as a partner in financial transactions

- 3.1. Successful banking relations are based on trust that is achieved with honest and open dialogue of both parties, mutual understanding and freedom of choice.

- 3.2. Competence and knowledge are essential in achieving a partnership. Therefore, banks provide adequate education to their employees and associates so that they can entirely respond to their clients' needs. They are made aware of this Code and instructed to apply it.
- 3.3. Bank employees realise that their work and relations reflect the entire bank; therefore their mutual relations must be based on co-operation, respect and assistance.

### 4. Bank information

- 4.1. A good working relationship is based on openness and trust, meaning that information exchanged between the bank and clients when doing business must be exact, complete and timely.
- 4.2. Fees for bank services, interest rates and other information are available to the clients in all branches. Banks oblige to deliver key data and changes to the Croatian Banking Association so as to make them uniformly available to the general public.
- 4.3. Banking communications, advertising and other marketing activities must be clear, true and unequivocal. They must not mislead the general public, transgress good business practice or inflict harm on others. Honest competition allows for all marketing means and forms of communication as long as such information stresses characteristics of a bank's business, advantages in its services, products or technology in order to achieve market expansion.

### 5. Client protection

- 5.1. Banking business does not only serve to execute banking transactions, being just a part of the wider economic and social environment. For this reason banks defend the integrity of the banking system as a whole and protect rights and interests of depositors, debtors and shareholders in the same way as their own interests and interests of their employees. Banks are conscious of their responsibility in ensuring transparency and regularity of the entire financial system.
- 5.2. All data regarding bank clients and business partners as well as value judgements obtained working with clients are considered bank secrets even after the end of client status. All personal data, including information concerning client accounts must not be divulged to anyone, including companies belonging to the same owner, except for cases clearly defined by the law, at client's direct demand or with their explicit consent.

- 5.3. Data concerning clients and their accounts are used only in order to enable efficient account management and supplying of banking services. Clients have right to access their information for the sake of verification and eventual correction of inaccuracies.
- 5.4. To protect clients and to respect regulations set by the Croatian National Bank, for particular transactions, including disclosure of personal data and account information, a positive client identification is needed.
- 5.5. Bank information systems should be specially protected from unauthorized access to bank files in order to protect interests of banks and clients and to preserve the integrity of data.
- 5.6. When a client notices a mistake in a banking transaction and informs the bank of such, a bank will attempt to verify the claim as timely as possible and correct such mistake without delay. If a longer time is necessary for verification of the claim, all measures shall be undertaken in order that temporary solution satisfying all parties can be taken. Banks determine procedures for submitting and dealing with clients' complaints within internal regulations.
- 5.7. In cases of financial difficulties of bank clients, the bank shall, while taking care of its own interests, act as a partner and as a first step be ready to open a discussion with the client. Clients are expected to inform their bank as soon as possible of existing or foreseeable future difficulties. That way, some difficulties in clients' business can be avoided and those that have already occurred can be handled in a proper way. Banks are partners with clients and only with clients' full co-operation can they offer a reasonable plan for consolidation, satisfactory to both parties.

## **6. Relations between banks**

- 6.1. Banks adhere to same existing regulations in mutual relations and business transactions as they do with other business subjects, with a special emphasis on protecting interests of the bank industry and fairness with regards to relations, loyal competition, while trying to maintain good reputation of other banks.
- 6.2. If a bank signer of this Code encounters difficulties, experiences loss of clients' confidence or finds itself in a difficult business situation, the entire banking industry will suffer from negative repercussions. Since all banks, accepting the Code have also accepted the principles of good banking practice, every bank is ready to give another bank

assistance at its request, undertaking all measures in order to retain client trust while preserving its own business interests.

- 6.3. Should problems or misunderstandings arise between banks that have accepted Code, banks commit themselves to attempt to find a solution constructively through dialogue based on the principles of good banking practice. If a dialogue between two (or more) parties does not result in a solution, banks shall primarily attempt to solve the dispute within the Croatian Banking Association.

## **7. Final provisions**

- 7.1. This Code becomes effective on 1 January 2001, and all members of the Croatian Banking Association shall strive to align their business with its stipulations by 1 July 2000.
- 7.2. Furthermore, all other banks in Croatia will be made aware of the Code, and accepting its principles will allow them to use the Code of Good Banking Practice in their own business.
- 7.3. Amendments and supplements to the Code can be initiated by any member of the Croatian Banking Association, and must be unanimously accepted by all members in order to become effective 30 days following their acceptance.
- 7.4. The full text of the Code is available to the public at the Croatian Banking Association web site - <http://www.hub.hr>.

## **8. Signed in Zagreb on November 27th, 2000.**

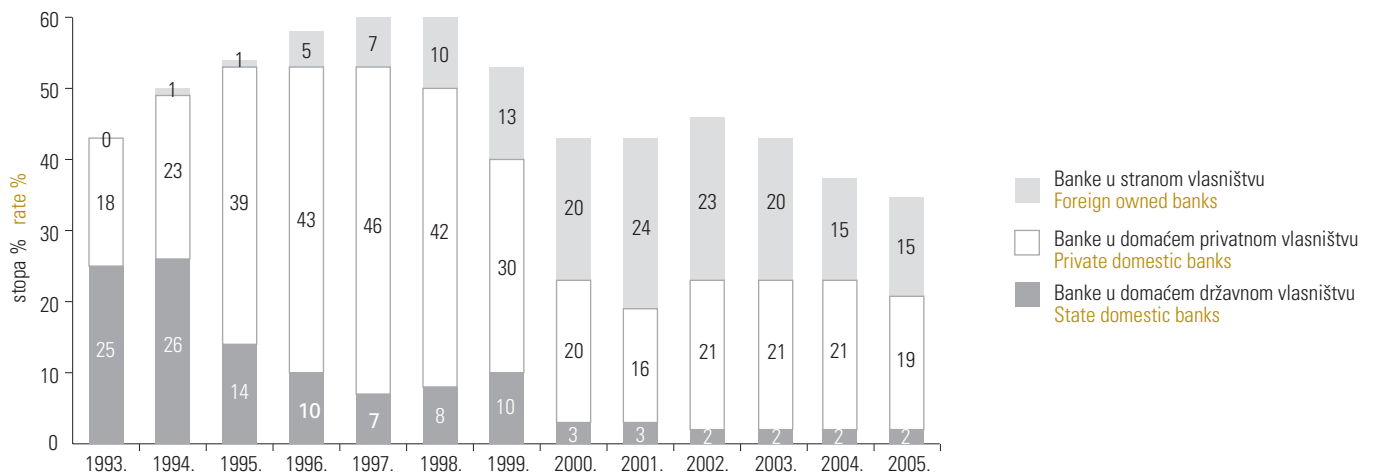
| Rang po aktivni       | Banka - članica Hrvatske udruge banaka | Ukupna aktiva<br>(000 kn)<br>Total assets | Udio u ukupnoj aktivni<br>%<br>Share in total assets | Rast aktive<br>%<br>Assets growth | Dobit (gubitak) nakon oporezivanja<br>(000 kn)<br>After-tax income (loss) | Stopa adekvatnosti kapitala<br>%<br>Capital adequacy ratio | Jamstveni kapital<br>(000 kn)<br>Regulatory capital |
|-----------------------|--|---|--|-----------------------------------|---|--|---|
| 1.                    | ZAGREBAČKA BANKA d.d.                  | 63.408.878                                | 24,4   | 10,32                             | 1.097.990   | 15,45  | 6.005.513   |
| 2.                    | PRIVREDNA BANKA ZAGREB d.d.            | 47.873.532                                | 18,4   | 16,42                             | 925.302   | 14,06  | 4.622.252   |
| 3.                    | ERSTE & STEIERMÄRKISCHE BANKA d.d.     | 30.435.625                                | 11,7   | 17,87                             | 436.408   | 12,94  | 2.297.211   |
| 4.                    | RAIFFEISENBANK AUSTRIA d.d.            | 28.659.961                                | 11,0   | 17,47                             | 369.782   | 12,80  | 2.170.782   |
| 5.                    | SG SPLITSKA BANKA d.d.                 | 23.366.246                                | 9,0  | 8,82                              | 353.737   | 11,14  | 1.570.918   |
| 6.                    | HYPOTHEKADRIEN BANKA d.d.              | 19.306.850                                | 7,4  | 13,04                             | 251.012   | 15,15  | 2.493.797   |
| 7.                    | OTP BANKA HRVATSKA d.d.                | 8.677.805                                 | 3,3  | 9,88                              | 160.346   | 15,20  | 770.492   |
| 8.                    | HRVATSKA POŠTANSKA BANKA d.d.          | 7.302.892                                 | 2,8  | 31,65                             | 115.782   | 16,47  | 681.741   |
| 9.                    | SLAVONSKA BANKA d.d.                   | 7.179.997                                 | 2,8  | 29,49                             | 47.358  | 20,33  | 1.090.967   |
| 10.                   | VOLKSBANK d.d.                         | 3.938.076                                 | 1,5  | 8,85                              | 31.806  | 12,57  | 345.618   |
| 11.                   | MEĐIMURSKA BANKA d.d.                  | 2.207.260                                 | 0,8  | 6,68                              | 38.103  | 17,41  | 221.821   |
| 12.                   | PODRAVSKA BANKA d.d.                   | 1.802.279                                 | 0,7  | 15,65                             | 19.138  | 13,18  | 163.328   |
| 13.                   | ISTARSKA KREDITNA BANKA UMAG d.d.      | 1.701.565                                 | 0,7  | 8,58                              | 27.116  | 17,36  | 147.330   |
| 16.                   | KARLOVAČKA BANKA d.d.                  | 1.124.535                                 | 0,4  | -7,57                             | 4.539   | 14,18  | 100.179   |
| 17.                   | PARTNER BANKA d.d.                     | 1.031.736                                 | 0,4  | 28,47                             | 26.195  | 15,67  | 129.412   |
| 19.                   | KREDITNA BANKA ZAGREB d.d.             | 913.446                                   | 0,4  | 7,91                              | 11.570  | 24,16  | 151.368   |
| 22.                   | CENTAR BANKA d.d.                      | 837.317                                   | 0,3  | 25,08                             | 12.478  | 16,15  | 117.263   |
| <b>UKUPNO - TOTAL</b> |  | <b>249.768.002</b>                        | <b>95,96</b>   | <b>17,1%</b>                      | <b>3.928.660</b>  | <b>13,73</b>   | <b>23.079.991</b>                                   |
|                       |  | <b>2005</b>                               |  |                                   |   |  |   |
|                       | ČLANICE HUB-a / CBA MEMBERS            | 249.768.002                               | 96,0%  | 17,1%                             | 97,2%   |  | 93,7%   |
|                       | UKUPNO HRVATSKA / TOTAL CROATIA        | 260.285.228                               | 100,0%   | 13,5%                             | 4.042.307   | 16,55  | 24.642.115  |
|                       |  | <b>2004</b>                               |  |                                   |   |  |   |
|                       | ČLANICE HUB-a / CBA MEMBERS            | 213.274.879                               |  |                                   |   |  |   |
|                       | UKUPNO HRVATSKA / TOTAL CROATIA        | 229.305.237                               |  |                                   |   |  |   |

RIADRIA BANKA d.d. pripojena je PRIVREDNOJ BANCI ZAGREB 01. siječnja 2004.  
 VARAŽDINSKA BANKA d.d. pripojena je ZAGREBAČKOJ BANCI 01. srpnja 2004.  
 DUBROVAČKA BANKA d.d. pripojena je NOVOJ BANCI 01. listopada 2004.  
 DRESDNER BANK CROATIA d.d. prestala je s radom u Hrvatskoj 31. prosinca 2004.  
 NOVA BANKA d.d. promijenila je naziv u OTP BANKA 01. rujna 2005.  
 SG SPLITSKA BANKA d.d. promijenila je naziv u Societe Generale Splitska banka d.d. 01. srpnja 2006.

RIADRIA BANKA d.d. was merged into PRIVREDNA BANKA d.d. on January 1, 2004  
 VARAZDINSKA BANKA d.d. was merged into ZAGREBACKA BANKA d.d. on July 1, 2004  
 DUBROVACKA BANKA d.d. was merged into NOVA BANKA d.d. on July 1, 2004  
 DRESDNER BANK CROATIA d.d. ceased its operations in Croatia on December 31, 2004  
 NOVA BANKA d.d. changed her name into OTP BANKA on September 1, 2005  
 SG SPLITSKA BANKA d.d. changed her name into Societe Generale Splitska banka d.d. on July 1<sup>st</sup> 2006

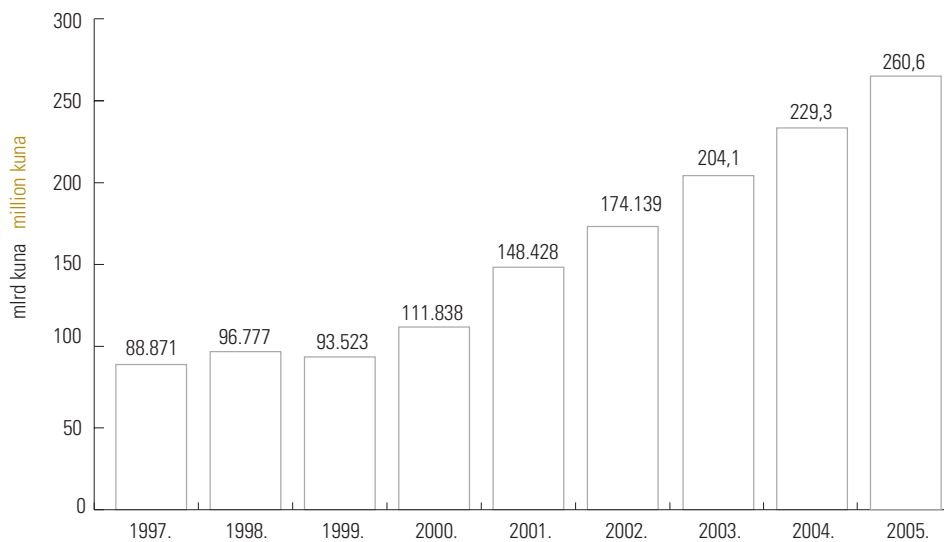
Broj banaka

Number of banks



Ukupna aktiva bankarskog sustava

Total assets of the banking system

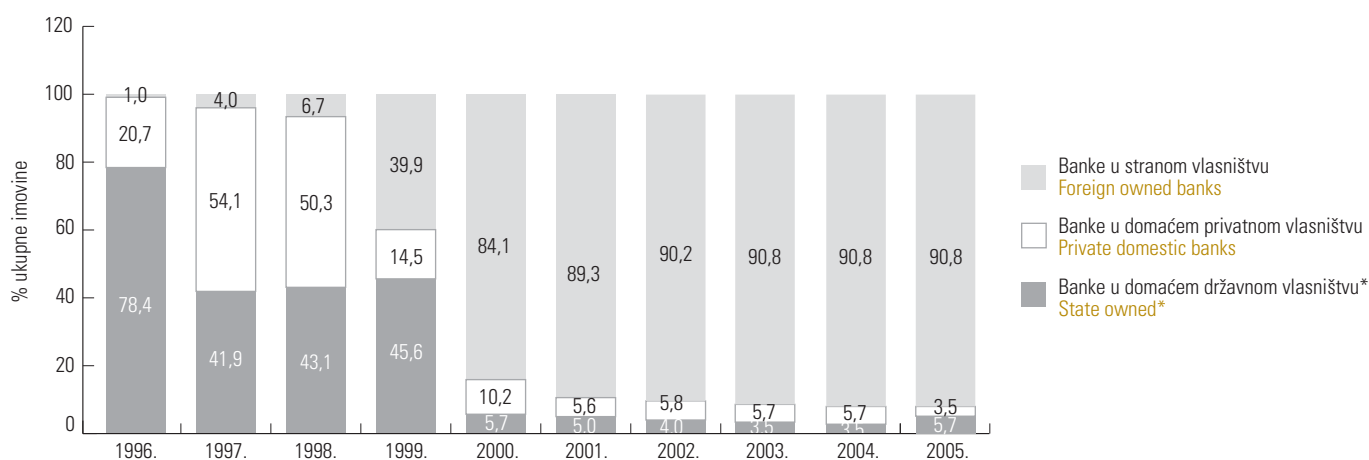


Prosječni srednji tečaj HNB za 2004.: EUR 1 = HRK 7.67  
Average midpoint CNB exchange rate for 2004: EUR 1 = HRK 7.67



Vlasnička struktura bankarskog sustava  
u % od ukupne imovine

Banking system by ownership  
in % of total assets

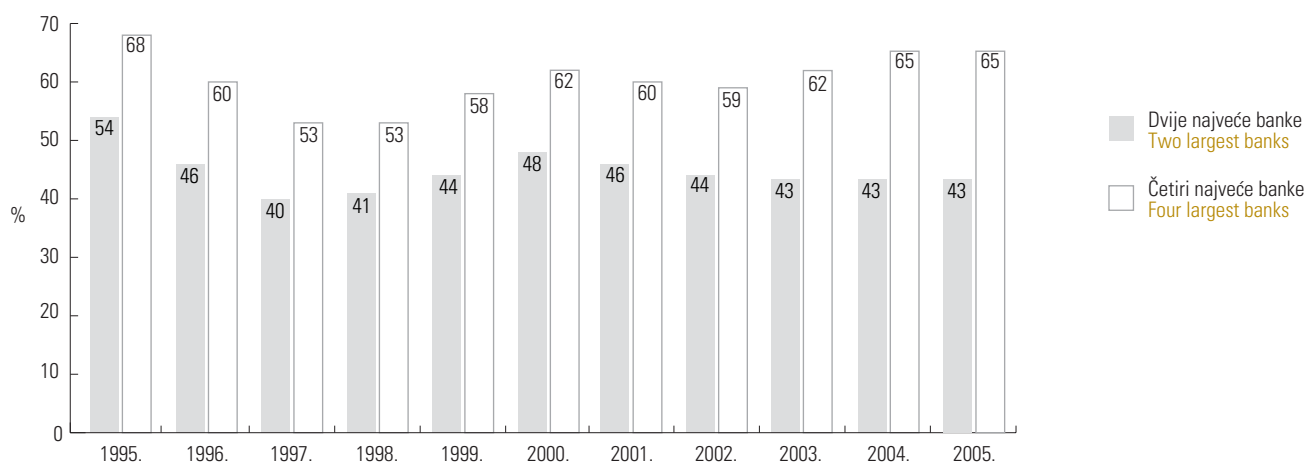


\*državno vlasništvo + privatno vlasništvo s pretežitim državnim udjelom

\*state owned + private with significant public stake

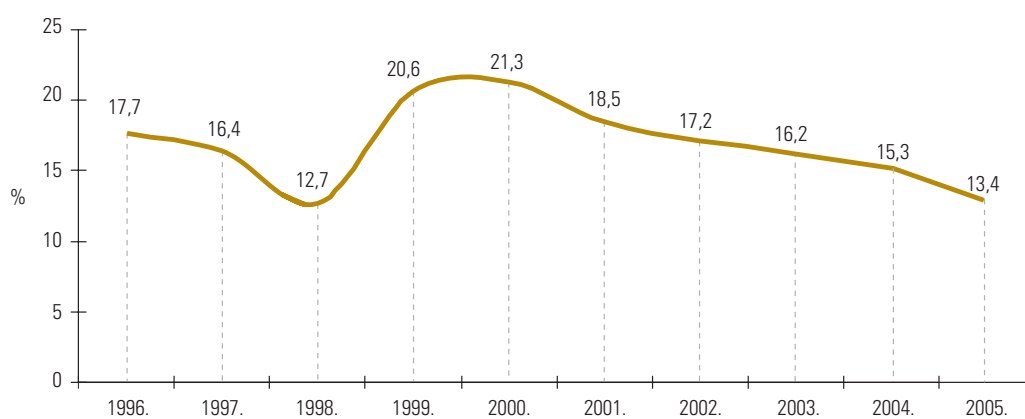
Indeks koncentracije  
udio aktive dvije (četiri) najveće banke u ukupnoj aktivi

Concentration index  
share of assets of 2 (4) largest banks in total assets



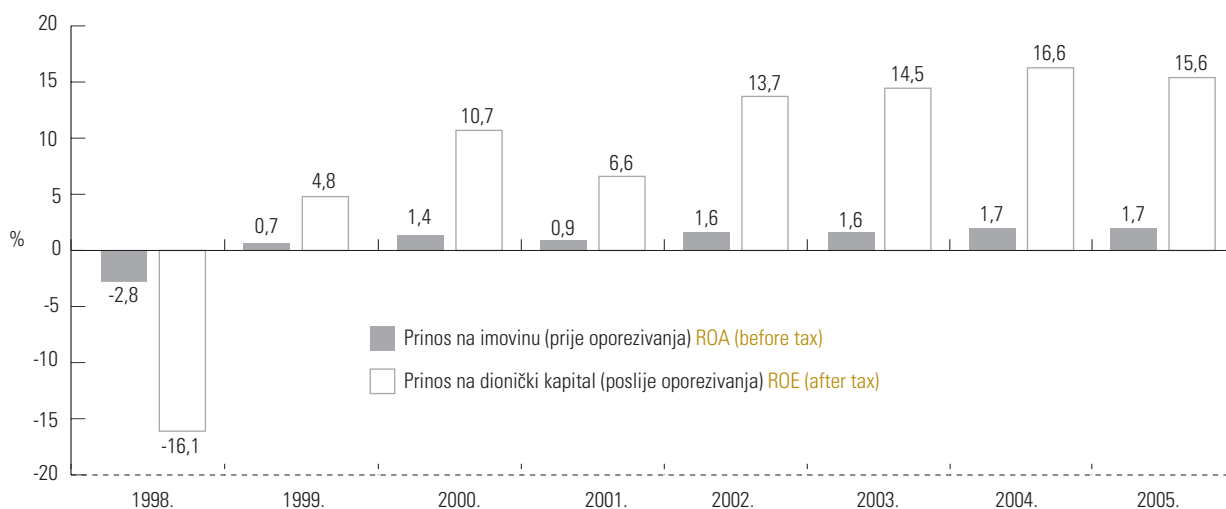
Adekvatnost kapitala banaka koje posluju u Hrvatskoj

Capital adequacy of banks operating in Croatia



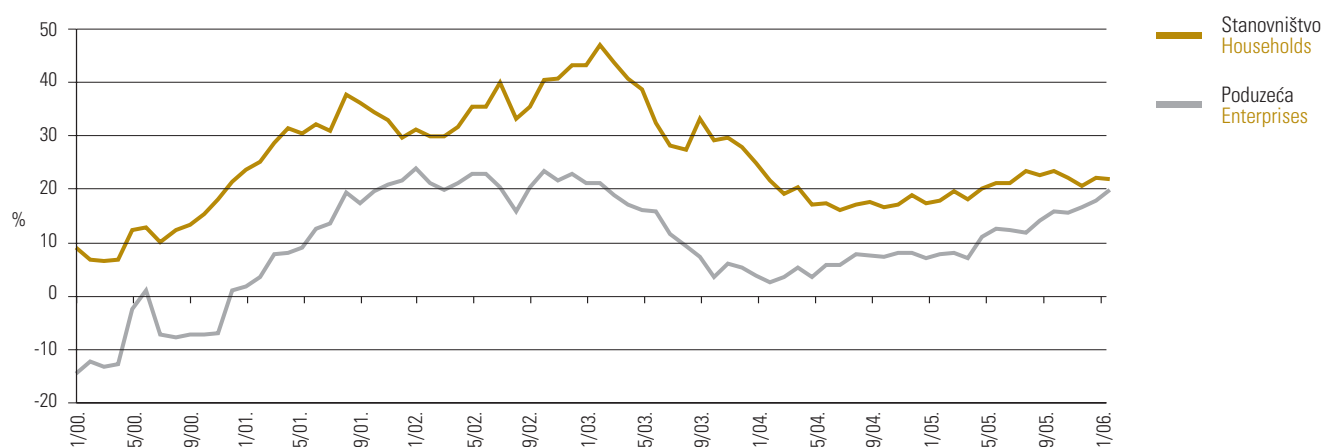
Prinos na imovinu i prinos na dionički kapital

Return on assets (ROA) and Return on equity (ROE)



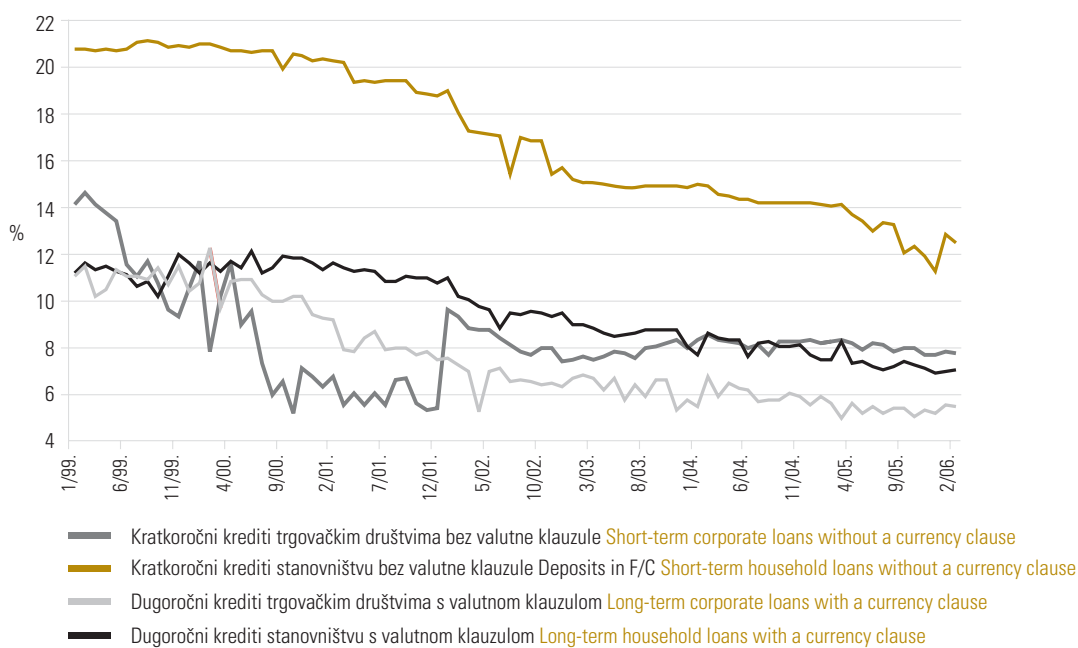
Kreditni stanovištvu i poduzećima stopa promjene u odnosu na isti mjesec prethodne godine

Domestic credit growth rates of credits to households and enterprises (month to same month a year earlier)



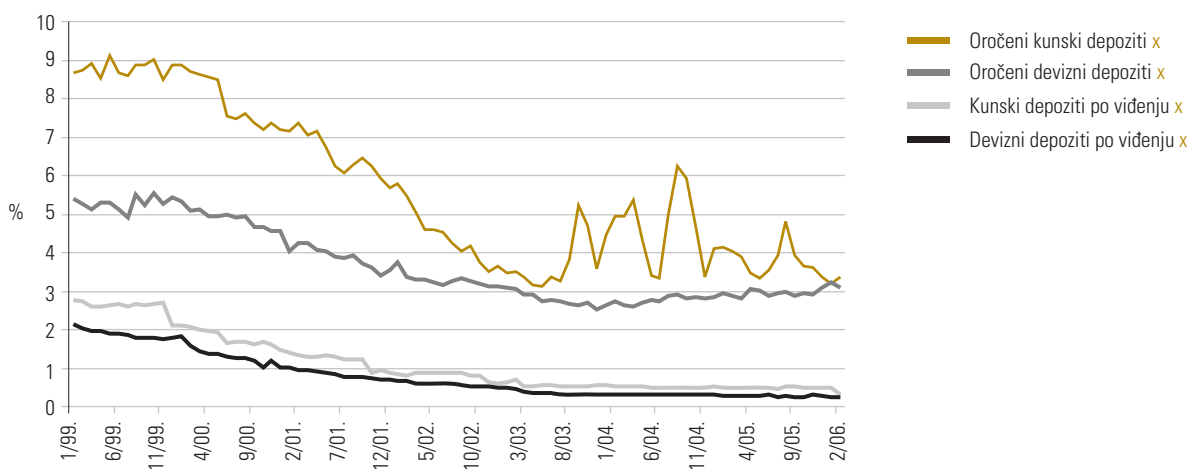
Prosječne aktivne kamatne stope banaka

Aktive interest rates of commercial banks



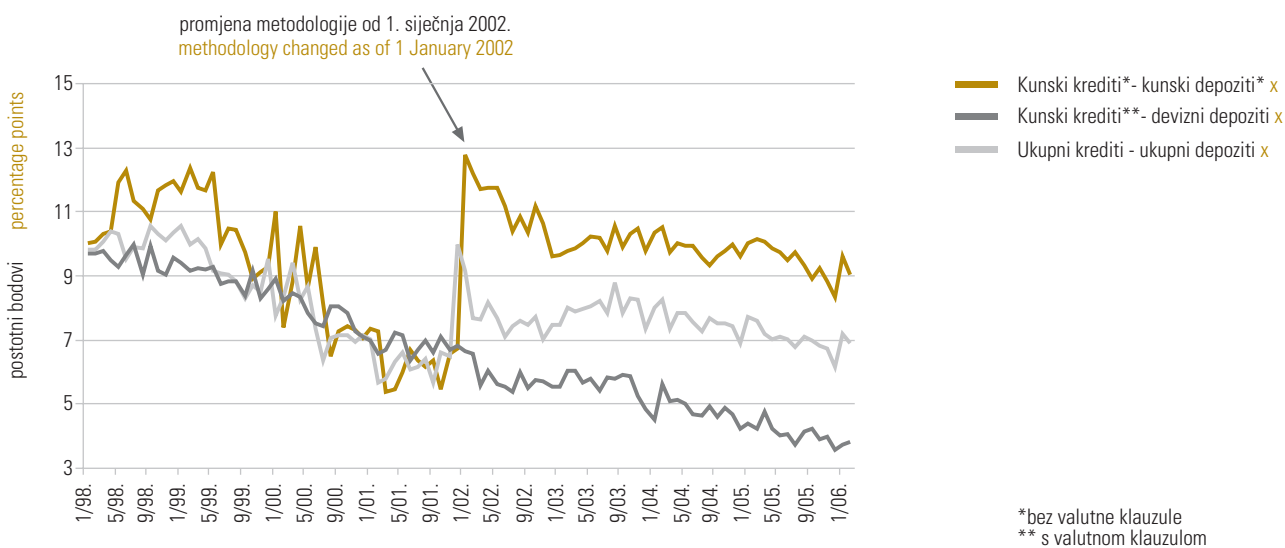
Prosječne aktivne kamatne stope banaka

Active interest rates of commercial banks



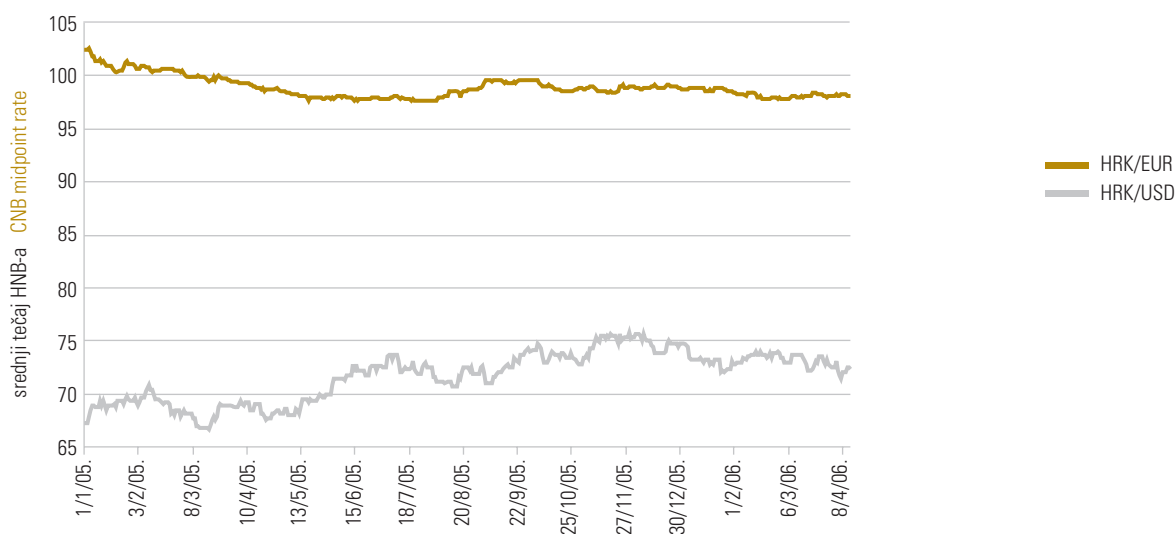
Razlika između kamatnih stopa na kredite i depozite

Interest rate spread



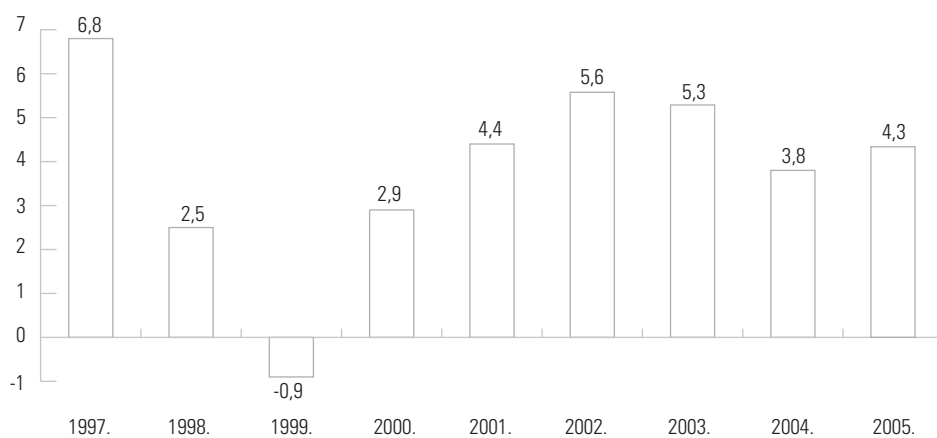
Indeks nominalnog dnevnog tečaja kune prema euru i američkom dolaru (2001. = 100)

Kuna (HRK) vs. EUR and USD



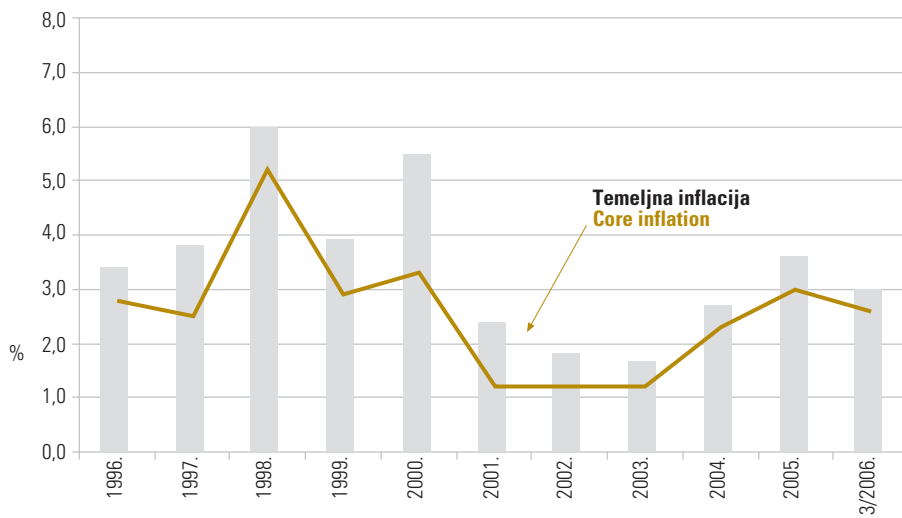
Stopa rasta realnog BDP-a

Real GDP growth rate



Inflacija

Inflation



Inflacija mjerena indeksom potrošačkih cijena (do kraja 1998. inflacija mjerena indeksom cijena na malo) i temeljna inflacija na kraju razdoblja, godišnje stope promjene

Inflacija

CENTAR BANKA d.d.  
10000 Zagreb, Jurišićeva 3  
Telefon: + 385 1/ 4803-444  
Telefaks: + 385 1/ 4803-441  
SWIFT: CBZGHR2X  
Internet: www.centarbanka.hr  
e-mail: centarbanka@centarbanka.hr

ERSTE&STEIERMÄRKISCHE BANK d.d.  
51000 Rijeka, Jadranski trg 3a  
Telefon: + 385 (0)62 37 1000  
Telefon: + 385 (0)62 37 5000  
Teleks: 24143 bankom hr  
SWIFT: ESBCHR22  
Reuters: ESZH  
Internet: www.erstebank.hr  
e-mail: esb@erstebank.hr

HRVATSKA POŠTANSKA BANKA d.d.  
10000 Zagreb, Jurišićeva 4  
Telefon: 062 472 472  
Telefaks: +385 1 4810 773  
SWIFT: HPBZHR2X  
Internet: www.hpb.hr  
e-mail: hpb@hpb.hr

HYPOT ALPE-ADRIA-BANK d.d.  
10000 Zagreb, Koturaška 47  
Telefon: + 385 1/ 6103-666  
Call Centre: 0800 HYPO HR (4976 47)  
Telefaks: + 385 1/ 6103-555  
SWIFT: HAABHR22  
Reuters: HAAZ  
Internet: www.hypo-alpe-adria.hr  
e-mail: bank.croatia@hypo-alpe-adria.com

ISTARSKA KREDITNA BANKA UMAG d.d.  
52470 Umag, Ernesta Miloša 1  
Telefon: + 385 52/702-300  
Telefaks: + 385 52/702-388  
SWIFT: ISKBHR2X  
Internet: www.ikb.hr  
e-mail: marketing@ikb.hr

KARLOVAČKA BANKA d.d.  
47000 Karlovac, I.G. Kovačića 1  
Telefon: + 385 47/ 611-540, 614-200  
Telefaks: + 385 47/ 614-206  
Teleks: 23742 kb ka rh  
SWIFT: KALCHR2X  
Internet: www.kaba.hr  
e-mail: karlovackabanka@kabanka.htnet.hr

KREDITNA BANKA ZAGREB d.d.  
10000 Zagreb, Ulica grada Vukovara 74  
Telefon: + 385 1/6167-333  
Telefaks: + 385 1/6116-466  
SWIFT: KREZHR2X  
Internet: www.kbz.hr  
e-mail: kbz-uprava@kbz.hr

MEĐIMURSKA BANKA d.d.  
40000 Čakovec, Valenta Morandinija 37  
Telefon: + 385 40/ 370-500  
Telefaks: + 385 40/ 310-971  
SWIFT: MBCKHR2X  
Internet: www.mb.hr  
e-mail: info@mb.hr

OTP BANKA d.d.  
23000 Zadar, Domovinskog rata 3  
Telefon: + 385 23/ 201-500  
Telefaks: + 385 23/ 201-859  
SWIFT: DBZD HR 2X  
Internet: www.otpbanka.hr  
e-mail: info@otpbanka.hr

PARTNER BANKA d.d.  
10000 Zagreb, Vončinina 2  
Telefon: + 385 1/ 4602-222  
Telefaks: + 385 1/ 4602-200  
SWIFT: PAZGHR2X  
Reuters: PAZH  
Internet: www.partner-banka.hr  
e-mail: partner@partner-banka.hr

PODRAVSKA BANKA d.d.  
48300 Koprivnica, Opatička 3  
Telefon: + 385 48/ 65-50  
Telefaks: + 385 48/ 622-542  
Teleks: 23368 pod kc rh  
SWIFT: PDKCHR2X  
Internet: www.poba.hr  
e-mail: info@poba.hr

PRIVREDNA BANKA ZAGREB d.d.  
10000 Zagreb, Račkoga 6 / p.p. 1032  
Telefon: + 385 1/ 4723-464  
Telefaks: + 385 1/ 4723-460  
Teleks: 21120 pbz rh  
SWIFT: PBZGHR2X  
Reuters: PBZH  
Internet: www.pbz.hr  
e-mail: head.office@pbz.hr

RAIFFEISENBANK AUSTRIA d.d.  
10000 Zagreb, Petrinjska 59  
Telefon: + 385 1/ 4566-466  
Telefaks: + 385 1/4819-462  
Teleks: 21137 rba zg rh  
SWIFT: RZBHHR2X  
Reuters: RBZH  
Internet: www.rba.hr  
e-mail: info@rba.hr

SLAVONSKA BANKA d.d.  
31000 Osijek, Kapucinska 29  
Telefon: + 385 31/ 231-231  
Telefaks: + 385 31/ 201-039  
SWIFT: SLBOHR2X  
Internet: www.slbo.hr  
e-mail: slbo@slbo.hr

SOCIETE GENERALE SPLITSKA BANKA d.d.  
21000 Split, Rudera Boškovića 16  
Telefon: + 385 21/ 304-304  
Telefaks: + 385 21/ 304-034  
Teleks: 26161; 26252 st bank rh  
SWIFT: BACXHR22  
Reuters: SBSH  
Internet: www.splitskabanka.hr  
e-mail: info@splitskabanka.hr

VOLKSBANK d.d.  
10000 Zagreb, Varšavska 9  
Telefon: + 385 1/4801-300  
Telefaks: + 385 1/4801-365  
SWIFT: VBCRHR22  
Internet: www.volksbank.hr  
e-mail: info@volksbank.hr

ZAGREBAČKA BANKA d.d.  
10000 Zagreb, Paromlinska 2  
Telefon: + 385 1/ 6104-000  
Telefaks: + 385 1/ 6110-533  
Teleks: 21211 zaba rh  
SWIFT: ZABAHR2X  
Reuters: ZBZH  
Internet: www.zaba.hr  
e-mail: zaba@zaba.hr

- VARAŽDINSKA BANKA d.d. pripojena je ZAGREBAČKOJ BANCI d.d. s 1. srpnjem 2004. VARAŽDINSKA BANKA d.d. merged into ZAGREBAČKA BANKA d.d. on July 1, 2004.
- HVB SPLITSKA BANKA d.d. promijenila je ime u SOCIETE GENERALE SPLITSKA BANKA 1. SRPNJA 2006. HVB SPLITSKA BANKA d.d. changed her name into SOCIETE GENERALE SPLITSKA BANKA d.d. on July 1, 2006.



*nakladnik*  
GIU Hrvatska udruga banaka

*fotografija*  
gettyimages

*design*  
Nela Marušić, One za MZB d.o.o.

*produkcija*  
MZB d.o.o.

*tisak*  
Vemako tisak

*naklada*  
600

Zagreb, 2006.

**GIU Hrvatska udruuga banaka**

Centar Kaptol  
Nova Ves 17  
10000 Zagreb  
Croatia  
tel.: +385 1 4860 080  
faks: +385 1 4860 081  
e-mail: [hub@hub.hr](mailto:hub@hub.hr)  
web-site: [www.hub.hr](http://www.hub.hr)