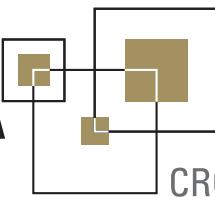


11.11.2013

HRVATSKA UDRUGA BANAKA



CROATIAN BANKING ASSOCIATION



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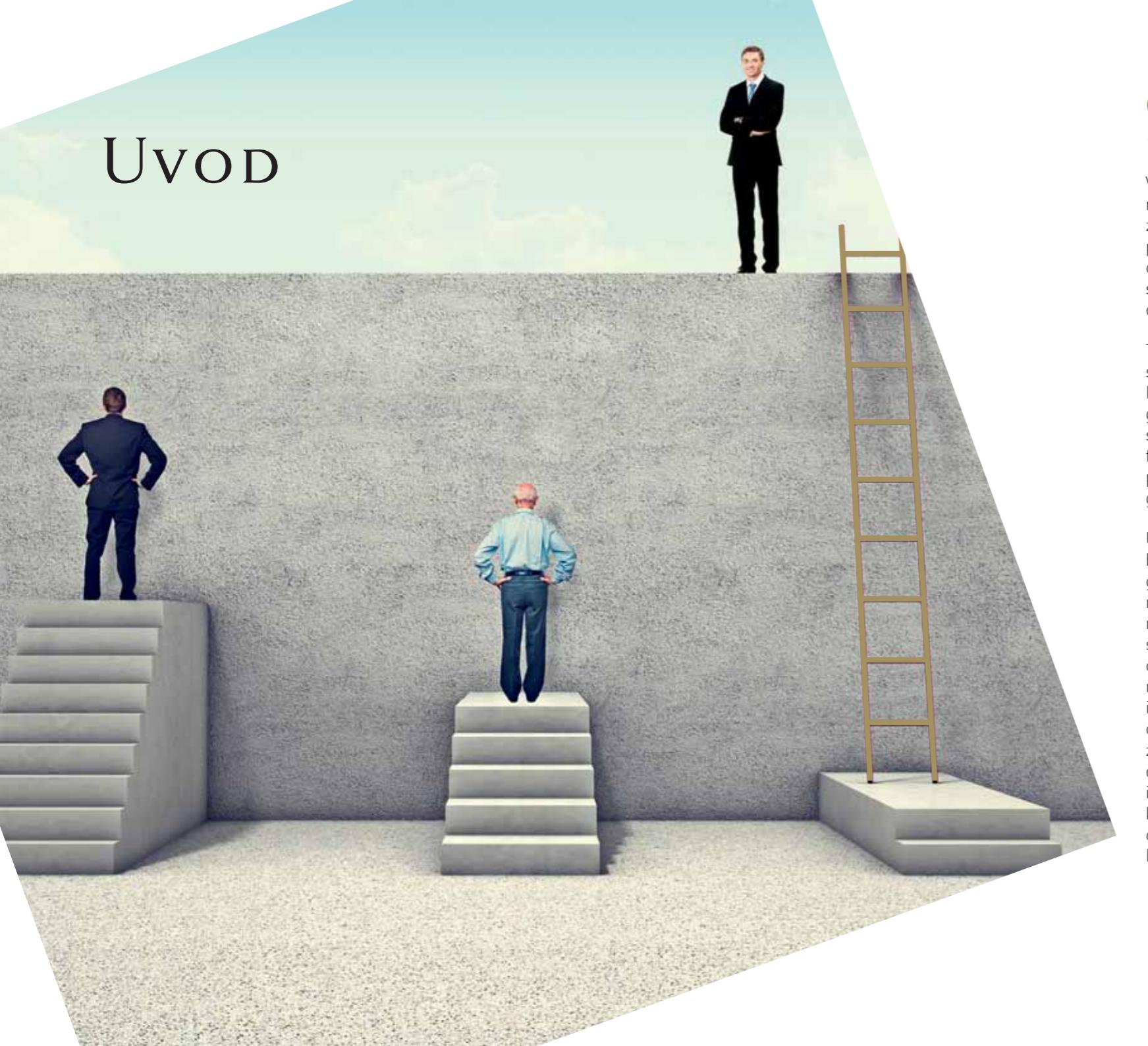
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HRVATSKA UDRUGA BANAKA 2013

ZAJEDNO...

- promičemo interese bankarstva u Hrvatskoj
- štitimo ugled i profesionalnost bankarske struke
- provodimo primjenu općih bankovnih načela i propisa
- podižemo standard bankovnog poslovanja
- 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

UVOD



GOSPODARSKO OKRUŽENJE

Vjerovali smo da se u Uvodniku ove godine nećemo morati osvrtati na produbljivanje recesije petu godinu zaredom. Ipak, čini se da će pozitivnije poruke još pričekati. Naznaka oporavka ima, ali pitanje je kada će se on snažnije pokrenuti. Banke ne mogu same stvoriti ekonomski rast, ali su ga spremne podržati dalnjim rastom kreditiranja i padom kamatnih stopa.

Ta će podrška biti utoliko jača ako se provedu nužne strukturne reforme i potakne poduzetničku aktivnost. Kao i većina građana Hrvatske, banke na to čekaju godinama. Dok se to ne dogodi, nastavit će činiti sve da sačuvaju finansijsku stabilnost, osiguraju nesmetano funkcioniranje temeljnih tokova platnog prometa i, prije svega, jamče sigurnost računa i štednih uloga građana Hrvatske.

Ulazak Hrvatske u Europsku uniju zasigurno će biti poticaj za oporavak zemlje jer se hrvatsko gospodarstvo sada smatra integralnim dijelom najvećega i najrazvijenijega ekonomskog prostora na svijetu, u kojem jedva sedam posto stanovništva stvara više od četvrtine globalnoga proizvoda. Uz olakšanje poslovanja hrvatskim poduzećima u EU i manje prepreka onima iz EU za poslovanje u Hrvatskoj i s Hrvatskom, važna je i percepcija Hrvatske u očima investitora kao stabilne zemlje, s usklađenim zakonodavstvom. To bi s jedne strane trebalo dovesti do većeg investiranja, a s druge do smanjivanja razlika i rizičnosti zemlje, a to će se preliti i u konvergenciju kamatnih stopa. Detaljno o usporedbama i elementima od kojih se sastoje kamatne stope može se pročitati u HUB Analizama.

REGULIRANJE ZAŠTITE POTROŠAČA

Posljednjih godina dana intenzivnije se govori o zaštiti potrošača i to se područje zakonski regulira, a s obzirom na to da je riječ o iznimno važnoj temi, Hrvatska udruga banaka aktivno sudjeluje u svim javnim raspravama. Smatramo da je jedan od ključnih elemenata zaštite potrošača daljnje poticanje konkurentnosti na tržištu koje je, što se tiče bankarskog sektora u Hrvatskoj, dinamično. Tržišnim natjecanjem za svakog klijenta potrošač uvijek dobiva, ima pravo i mogućnost odlučiti kojoj će banchi dati svoje povjerenje, koji će oblik financiranja zatražiti i koje će planove realizirati.

U pretjeranom reguliranju, propisivanju i ograničavanju postoji opasnost da se proizvede suprotan učinak, odnosno da pojedini krediti postanu pojedinim segmentima potrošača manje dostupni. Time se umanjuje njihova sigurnost i povećava rizik da se okrenu ilegalnom tržištu, pa u tome treba postupati s odgovarajućom pažnjom i najboljom svjetskom praksom.

Podsjećamo na to da je, za razliku od nekih drugih uslužnih djelatnosti, bankama posljednjima u interesu da se naplate od klijenta prisilnom naplatom i tako s njima izgube priliku za dugoročan poslovni odnos. Posljednjih godina realizirane su brojne mjere restrukturiranja i refinanciranja kredita kako bi se za svakog pojedinog građanina pokušalo po potrebi pronaći rješenje do izlaska zemlje iz gospodarske krize.

STABILNOST BANAKA U INTERESU JE CIJELOGA DRUŠTVA

Hrvatske su banke među rijetkima u Europi koje tijekom najteže finansijske krize nisu trebale pomoći vlade. Naše su banke ostale među najbolje kapitaliziranim u Europi. Zbog toga su bile u prilici tijekom početne eskalacije krize povećati kreditiranje države. Banke su tako pomogle normalnom obavljanju javnih funkcija i ispunjavanju ciljeva socijalne politike. Potom su znatno povećale kreditiranje klijenata, podržavajući kreditno sposobne klijente, posebno one kojima je trebao pojačan finansijski oslonac da prebrode učinke krize. Hrvatska je u europskim usporedbama iznimka jer je u gospodarstvu koje je u pet godina izgubilo 10 posto BDP-a ipak povećano kreditiranje privatnoga sektora za više od 15 posto.

Istodobno su plasmani stanovništvo stagnirali. To s jedne strane pokazuje oprez stanovništva, tako da je smanjena potražnja. Sa strane ponude, kroz primjenu međunarodne bankarske regulative koja traži sve veće kapitalne rezerve i veća izdvajanja za rizike na postojeće plasmane, nužno je smanjen "apetit" za rizikom u usporedbi s godinama prije krize.

Prema podacima HNB-a, banke su izravno zapošljavale oko 22.000 osoba. U toj brojci krije se natprosječan udjel visokostručnih osoba. Njihov rad i znanje posve su ravnopravni radu i znanju njihovih kolega iz najrazvijenijih zemalja EU. Upravo zbog tih ljudi ne čudi što je ova kriza pokazala da banke ne maksimiziraju kratkoročnu nego dugoročnu dobit. Strateška usmjerenost prema dugoročnoj dobiti znači da su banke potpuno svjesne toga da je bolje ostvariti manji povrat na kapital u bogatoj zemlji nego veći povrat u siromašnoj.

HUB U EUROPSKOJ UNIJI

Hrvatska udruga banaka ulaskom Hrvatske u EU postaje punopravna članica Europske bankovne federacije (EBF) i Europskoga platnog vijeća (European Payment Council – EPC). Uz prava koja članstvo nosi, preuzet će i dodatne obveze sudjelovanja u donošenju odluka glavnih tijela, kao i svih odbora i radnih skupina, tih organizacija.

Banke u Hrvatskoj posluju uvažavajući principe društveno odgovorna poslovanja. Takvo poslovanje najviše se ogleda u tome da banke stvaraju veliku dodanu vrijednost i plaćaju poreze i doprinose. Posluju konkurentno poštujući sva pravila tržišnoga natjecanja i bit će ravnopravni sudionici na tržištu Europske unije.

Zoran Bohaček
direktor

USTROJ HRVATSKE UDRUGE BANAKA



Radna skupina za sigurnost i zaštitu u bankama



Radna skupina za odnose s javnošću



Radna skupina za e-račun



Ad hoc radne skupine



Odbor za pravna i institucijska pitanja



Odbor za upravljanje aktivom i pasivom



Odbor za platni promet



Odbor za kartično poslovanje



Odbor za razmjenu podataka



Odbor za upravljanje rizicima



Odbor za stambenu štednju



Odbor za usklađenost



Odbor za sprječavanje pranja novca



Odbor za tržišno komuniciranje



Odbor za korištenje EU fondova



Odbor za mirenje u bankarstvu



Odbor za društvenu odgovornost

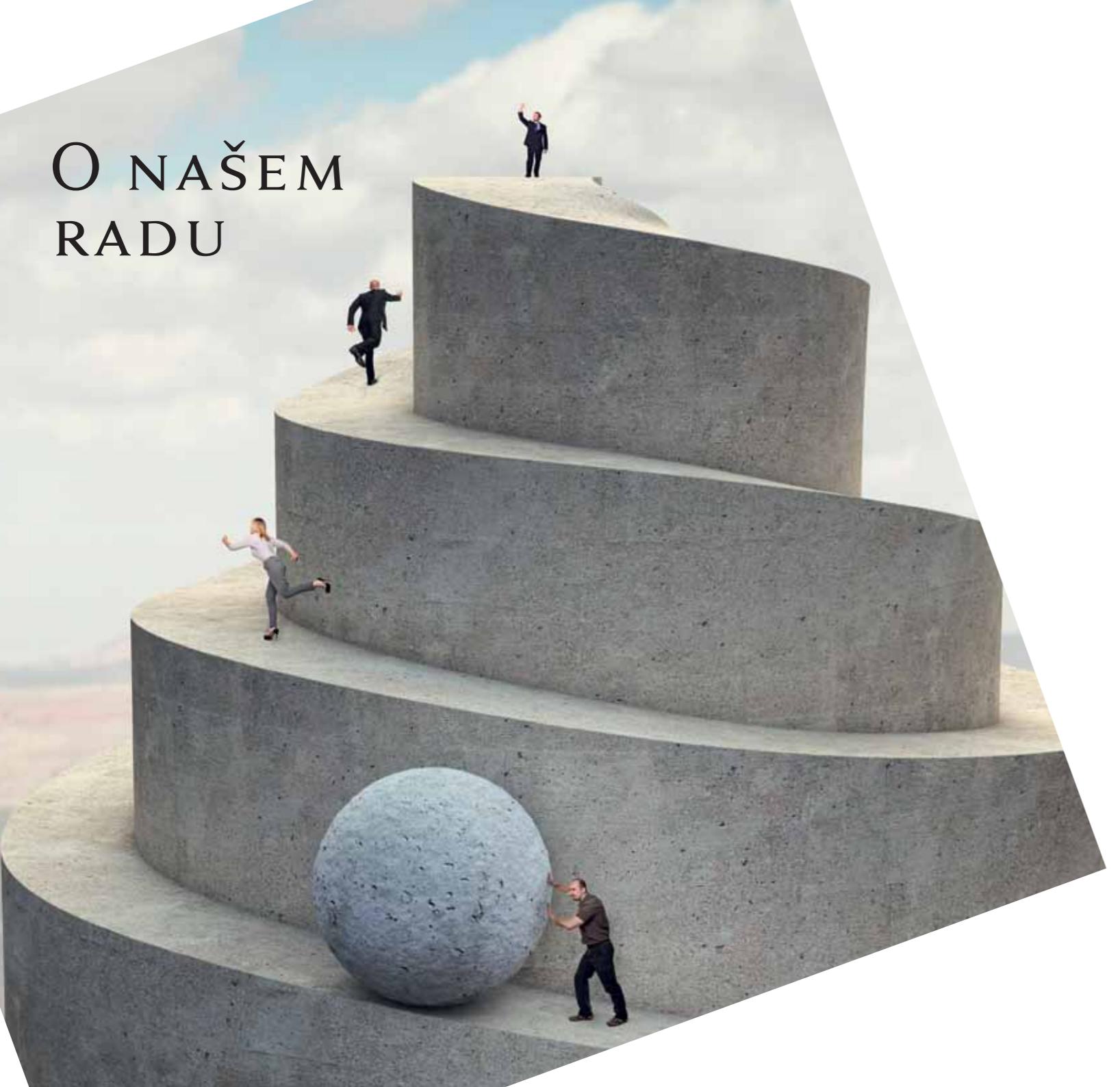


Odbor za informacijsku sigurnost



Klub glavnih ekonomista

O NAŠEM RADU



Radi što uspješnijeg rada Hrvatska udruga banaka imenovala je nekoliko strukovnih odbora i pododbora, kao i drugih stalnih ili povremenih tijela. Stručnjaci iz banaka aktivno sudjeluju u radu naših odbora i radnih skupina. Neki se sastaju češće jer su aktivnosti na nekim područjima izrazito dinamične, dok se drugi okupljaju ovisno o važnosti tema. U nastavku dajemo pregled osnovnih zaduženja i aktivnosti pojedinih odbora i radnih skupina HUB-a.

ODBORI



Odbor za pravna i institucijska pitanja okuplja pravne stručnjake iz banaka članica čiji je zadatak pokrenuti inicijative od interesa za pravnu funkciju banaka članica. Oni daju prijedloge Izvršnom odboru i drugim tijelima HUB-a. Njihova funkcija najviše se očituje kada HUB daje mišljenja o cijelom nizu zakonskih i podzakonskih akata koji se tiču poslovanja banaka. Članovi Odbora sudjeluju i u radu drugih tijela HUB-a.



Odbor za upravljanje aktivom i pasivom okuplja u pravilu odgovorne za upravljanje aktivom i pasivom iz banaka članica, čiji je osnovni zadatak razmatranje mjera iz područja centralnobankarskih operacija. Osim s HNB-om, surađuje s Hanfom (Hrvatskom agencijom za nadzor finansijskih usluga), Ministarstvom financija i ACI-jem Hrvatska.



Odbor za platni promet od osnutka je vrlo aktivno u rješavanju otvorenih pitanja u funkcioniranju platnog prometa u zemlji. Temeljni su mu zadaci pokretanje inicijativa od interesa za funkciju obavljanja platnog prometa banaka članica. Odbor ima i šest

radnih skupina koje se bave operativno-tehničkim pitanjima. U sklopu novog Zakona o platnom prometu ponovno se intenzivno radi na standardizaciji. Izradili smo novi univerzalni nalog za plaćanje HUB-3, kao i novi nalog za nacionalna plaćanja HUB-3A. U tijeku je standardizacija datoteka za razmjenu podataka s klijentima, Finom, državnim tijelima, odnosno svim sudionicima platnoga prometa. Odbor za platni promet polako je preuzeo i rad na pitanjima kojima se prije bavio Odbor za devizna pitanja. U sklopu ovog odbora formirala se i SEPA (Single Euro Payment Area) radna skupina koja je pripremala rad na uvođenju SEPA-e u Hrvatsku. Nacionalni odbor za platni promet (NOPP), u kojem HUB ima četiri predstavnika, u svibnju 2013. donio je odluku o osnivanju Hrvatskog odbora za SEPA koordinaciju (HOSK), koji će pod vodstvom HUB-a pripremiti uspješan prijelaz na SEPA standarde i tehničke zahtjeve do krajnjeg propisanog roka 31.listopada 2016.



Odbor za kartično poslovanje okuplja principalne članove MasterCard Internationala i Visa Internationala (Zagrebačka banka d.d., Privredna banka d.d., Erste&Steiermarkische Bank d.d., SG Splitska banka d.d., Raiffeisenbank Austria d.d., Hrvatska poštanska banka d.d., Hypo Alpe-Adria-Bank d.d., Banco Popolare Croatia d.d. te kartične kuće PBZ Card d.o.o. i Erste Card Club d.d.).

Djelokrug njegova rada su nekompetitivna područja kartičnog poslovanja, kao što su sigurnost, tehnologija, pravo i chargeback na razini brendova MC-a, VISA-e, AmExa i Dinersa. U sklopu Odbora djeluju Povjerenstvo za sigurnost, Povjerenstvo za tehnologiju, Pravno povjerenstvo i Chargeback Forum.



Odbor za razmjenu podataka osnovan je s ciljem uspostave Sustava razmjene podataka o neurednim dužnicima (SRI). Sustav je organiziran radi minimiziranja rizika kreditnih proizvoda, naplate, praćenja i kontrole rizika. Sudionici razmjene podataka obvezni su djelovati odgovorno i primjenjivati sve mjeru za očuvanje sigurnosti i tajnosti informacija, u skladu s propisima i internim aktima.



Odbor za upravljanje rizicima osnovan je potkraj 2007. s ciljem transparentnijega utvrđivanja najbolje prakse iz područja upravljanja rizicima na hrvatskom bankovnom tržištu, zajedničkog nastupa prema HNB-u, kao i mogućnosti organizirana djelovanja prema europskim udruženjima, usuglašavanja stavova na razini bankarskog sustava o bitnim elementima (područja nacionalnih diskrecija) buduće Basel II usuglašene zakonske regulative te razmjene znanja između članova Odbora. Ima tri pododbora: za kreditne rizike, za operativne rizike i za tržišne rizike.



Odbor za stambenu štednju osnovan je 2007. i čini ga svih pet stambenih štedionica na hrvatskom tržištu: Prva stambena štedionica, PBZ stambena štedionica, Raiffeisen stambena štedionica, Wüstenrot stambena štedionica i HPB stambena štedionica. Zbog specifičnosti posla i problematike s kojom se susreću stambene su štedionice odlučile putem HUB-a iznositi svoje stavove s ciljem zaustavljanja negativnih trendova u izmjeni zakonske regulative, zbog kojih je nemoguće ispuniti prepostavke pod kojima su osnovane prije više od deset godina i istodobno pozitivno i stabilno poslovati.



Odbor za uskladenost osnovan je 2010. godine. Pojam "uskladenosti" (eng. compliance) relativno je nov pojam u bankarstvu, reguliran je za-

konom i uveden u poslovanje banaka. Budući da je osnovna funkcija odjela za usklađenost u bankama pratiti da sve politike i procedure budu u skladu sa zakonskom regulativom, odnosno da jedan zakon ne derogira drugi, usko surađuju s drugim odborima i prate njihov rad.



Odbor za sprječavanje pranja novca okuplja ovlaštene osobe za sprječavanje pranja novca u bankama i njihove zamjenike. S obzirom na specifičnosti problematike pranja novca, aktivno raspravlja, daje mišljenja i preporuke za cijeli niz propisa, odluka i smjernica, te potiče na rješavanje onih tema koje su se u praksi pokazale problematičnima.



Odbor za tržišno komuniciranje osnovan je u svibnju 2009., a njegovi su zadaci analiza postojeće regulative tržišnih komunikacija, praćenje hrvatske regulative i razvoj samoregulacije na temeljima kodeksa struke, uz uvažavanje najboljih iskustava iz međunarodne prakse. Bankovna je industrija, naime, kao i ostali sudionici tržišnog komuniciranja, suočena sa zahtjevnim tržišnim okolnostima te vrlo dubokim promjenama u regulativi koja ubrzano uređuje područje oglašavanja, tržišnog komuniciranja i marketinga u cjelini. Najveći razlog novih i zahtjevnijih pravila igre za oglašivače leži u činjenici da se domaće zakonodavstvo ubrzanim ritmom uskladišta s pravnim stečevinama Europske unije (EU) kako bi se ubrzao proces ulaska Hrvatske u EU.

Odbor je usvojio Kodeks oglašavanja s minimumom preporučenih standarda tržišnog komuniciranja za članice Hrvatske udruge banaka, ali i bankovne industrije u cjelini. To će zasigurno olakšati i učiniti kvalitetnijim cjelokupni "proizvodni proces" u segmentu tržišnog komuniciranja te unaprijediti suradnju između banaka kao oglašivača, agencija za tržišno komuniciranje i cjelokupne javnosti.



Odbor za korištenje EU fondova osnovan je kako bi banke članice HUB-a što efikasnije prednijele pripremi i razvoju operativnoga nacionalnog programa konkurenčnosti. Cilj je razmjenom iskustava u bankama, prijedlozima i aktivnostima, u suradnji s ostalim dionicima, što kvalitetnije surađivati na programiranju korištenja sredstava Europske unije.



Odbor za mirenje u bankarstvu osnovan je potkraj 2010. godine. Osnovna mu je zadača predlaganje i provođenje aktivnosti u sklopu uspostave Centra za mirenje u bankarstvu, a nakon uspostave Centra praćenje njegova rada. Odbor može pokretati i inicijative od interesa za postupke mirenja, donositi mišljenja i preporuke o temama iz područja mirenja ili drugog, izvansudskog rješavanja sporova.



Odbor za društvenu odgovornost kao osnovnu zadaću odredio je aktivno sudjelovanje na unapređenju znanja i kulture o društvenoj odgovornosti. Banke koje sudjeluju u radu Odbora kao cilj su postavile nadogradnju svih aktivnosti kontinuiranim obrazovnim sadržajima vezanima uz teme društveno odgovornog poslovanja (DOP). Naime, DOP sve više postaje šire područje unutar poslovanja banaka integrirano u korporativno upravljanje. Odbor surađuje s Hrvatskom bankom za obnovu i razvitak (HBOR), čiji predstavnik sudjeluje u radu Odbora.



Odbor za informacijsku sigurnost osnovan je početkom 2012. godine s ciljem predstavljanja interesa hrvatskih banaka na području informacijske sigurnosti u Hrvatskoj i inozemstvu. Djelokrug rada Odbora je organiziranje zajedničkih aktivnosti radi unapređenja informacijske sigurnosti, razvoja sustava upravljanja rizicima nastalih zloupotrebljom informacija i informacijskih kanala te pripremanje i davanje

inicijative za formiranje pravne i zakonske regulative informacijske sigurnosti u Hrvatskoj.



Klub glavnih ekonomista osnovan je radi promicanja uloge glavnih ekonomista u hrvatskim bankama, razmjene iskustava i iznošenja zajedničkih stavova. Šest većih hrvatskih banaka upošljava, naime, glavne ekonomiste i/ili osobe zadužene za strateški razvoj, a putem Kluba povremenim anketama želi se prikazati njihovo mišljenje o najvažnijim gospodarskim kretanjima i očekivanjima.

RADNE SKUPINE



Radna skupina za sigurnost i zaštitu u bankama

Radna skupina za sigurnost i zaštitu u bankama vrlo aktivno raspravlja i razmjenjuje mišljenja o svim principima tehničke i fizičke sigurnosti banaka. Redovito surađuje s MUP-om, ponajprije jedanput godišnje u zajedničkoj organizaciji seminara o trendovima razbojništava u poslovcima banaka, kao i u pitanjima podzakonskih akata. Temeljem nominacije neke od banaka članica, HUB dodjeljuje i godišnju nagradu ustrojstvenoj jedinici MUP-a koja je te godine najzaslužnija za razrješenje kaznenog djela razbojništva počinjenog u nekoj od poslovnica banaka. Budući da je prošlo sedam godina od posljednjih izmjena Zakona o minimalnim mjerama zaštite u poslovanju gotovim novcem i vrijednostima, kao i nekikh pravilnika, na inicijativu ove radne skupine HUB-a ministar unutarnjih poslova je prihvatio je osnivanje šire radne skupine svih dionika s ciljem predlaganja izmjena postojećeg ili rada na novom zakonu. Radna skupina aktivirana je 2012. godine i nakon višekratnih konzultacija objavljen je prijedlog novog Zakona o zaštiti novčarskih institucija, s planom donošenja u trećem tromjesečju 2013. godine.



Radna skupina za odnose s javnošću

Radna skupina za odnose s javnošću okuplja direktore komunikacija i PR menadžere banaka članica. Cilj joj je dati rješenja i preporuke za PR izazove s kojima se susreću banke i HUB. Radna skupina intenzivno obrađuje aktualna pitanja vezana uz bankovni sektor i donosi smjernice za što učinkovitiju komunikaciju s medijima i ostalim javnostima u razdoblju niza promjena i velikih izazova za bankovnu industriju u cjelini. Tako jača uloga funkcije odnosa s javnošću HUB-a, koji i dalje ima stratešku ulogu "glasnogovornika" cjelokupnog sektora.



Radna skupina za e-račun radi na uvođenju e-računa u Hrvatsku, odnosno na standardizaciju e-plaćanja i e-HUB obrasca za plaćanje. Još 2008. godine osnovano je, uz sudjelovanje države, akademskih institucija i privatnog sektora, Povjerenstvo za e-račun, koje je imalo dva odbora – tehnički i poslovni. Predstavnici banaka bili su zastupljeni u oba odbora, a odbori su pripremili i predstavili niz rješenja. Direktor HUB-a član je Nacionalnog vijeća za e-poslovanje (NVEP) te aktivno sudjeluje u donošenju zakonskih preduvjeta da e-račun u potpunosti pravno i praktično zamijeni račun u papirnatom obliku. Najveća prepreka uklonjena je izmjenom Pravilnika o PDV-u sredinom 2011. godine, ali provedba i nadzor još se definiraju. Tijekom 2012. godine NVEP je zamijenio Povjerenstvo za e-račun Nacionalnim višedioničkim forumom za e-Račun i njegovim radnim skupinama, koje preslikavaju slično ustrojen forum na razini EU. Ulagak u EU znači i punu harmonizaciju s Direktivom 2010/45, koja u potpunosti izjednacuje papirnati i e-račun, ali i prije toga nastojimo otkloniti posljednje prepreke, pravne i tehničke, za što skorije uvođenje u širu praksu u Republici Hrvatskoj.



Ad hoc radne skupine povremena su radna tijela koja se sastaju radi određenih tema i problema kada se pojave. Obično su kraćeg vijeka i pokušavaju dati prijedloge ili rješenja nadležnim odborima ili Izvršnom odboru HUB-a.

HUB ANALIZE



Hrvatska udruga banaka pokrenula je HUB Preglede, tromjesečnu publikaciju koja sada redovito analizira teme kao što su izvori sredstava banaka, plasmani, kamatne stope, troškovi regulacije, zarade, kapitalizacija, rizici, a koje smo ranije obrađivali jednom godišnje u sklopu HUB Analiza. HUB Preglede možete pronaći na našim internet stranicama www.hub.hr

FISKALNA POLITIKA U HRVATSKOJ I EU:

Smjer je dobar, ali korak je prekratak

Br. 38., srpanj 2012

Hrvatska fiskalna pozicija i dalje nije održiva, kao što su pokazale analize u protekle dvije godine. Međutim, za razliku od prijašnjih fiskalnih analiza, sada po prvi put registriramo korak u dobrom smjeru. Blaga je prilagodba primarnog fiskalnog salda po prvi put od početka krize zabilježena 2011. Nova je vlada prilagodbu pojačala te zacrtala njen smjer do 2014., kada se zahvaljujući Zakonu o fiskalnoj odgovornosti očekuje približavanje primarnog fiskalnog salda nuli.

Iako je fiskalni smjer dobar, korak bi mogao biti prekratak. U uvjetima u kojima je realno očekivati nepovoljno, ili barem nedovoljno poticajno međunarodno okružje, potrebna fiskalna prilagodba trebala bi biti veća od one zacrtane trogodišnjim proračunom 2012. – 2014. U suprotnom, hrvatski će javni dug nastaviti nekontrolirano rasti, što bi Hrvatsku pri kraju mandata ove vlade moglo uvesti u opasnu fiskalnu zonu.

S druge strane, ustrajanje na dosljednoj provedbi Zakona o fiskalnoj odgovornosti, za što još uvijek postoje objektivne šanse, doprinijelo bi očuvanju kreditnoga rejtinga. Nakon toga je za očekivati postupno smanjivanje troškova financiranja. To bi se moglo događati u najpovoljnijem mogućem političkom trenutku nakon ulaska u EU. Na taj bi se način za nešto više od godinu dana oformila političko-ekonomski konstelacija u kojoj bi Hrvatska mogla povući značajnu „razvojnu dividendu“.

POSLOVANJE BANAKA 2011/2012:

Povratak negativnih trendova uz iznimno visoku kapitalizaciju

Dvobroj 39/40, rujan 2012.

Hrvatski bankovni sustav trenutačno ima najveći omjer kapitalne adekvatnosti u Europi te se može smatrati iznimno sigurnim. Međutim, prve naznake rasta aktivnosti i profitabilnosti koje smo registrirali u ovo doba prošle godine, u međuvremenu su nestale. Došlo je do

gušenja potražnje za kreditima u skladu s nešto slabijim gospodarskim kretanjima od očekivanih u drugom tromjesečju 2012.

Ne čudi da se dobit banaka u takvim uvjetima smanjuje. Zbog toga je stopa povrata na kapital u hrvatskom bankarstvu ponovo niža od prinosa na dugoročnu kunsku državnu obveznicu. Stopa je među nižima u usporedbi s europskim zemljama koje u zadnjoj krizi nisu imale problema s bankama.

Velikoga manevarskog prostora za pronalazak politike i taktike za promjenu opisanog stanja nema. Povećanje troškovne efikasnosti ograničeno je i zahtijeva vrijeme, a kako rezervacije za gubitke i dalje apsorbiraju 40%-50% neto rezultata prije rezerviranja, očito je da će prva sljedeća promjena nastupiti tek kada se taj omjer znatno smanji. Za sada, međutim, nema naznaka da bi do takvoga smanjenja moglo ubrzo doći. Naposljetku, nadolazak takve situacije u najmanjoj mjeri ovisi o samim bankama.

NOVA EUROPSKA ARHITEKTURA FINANSIJSKE STABILNOSTI: Učvršćivanje temelja

Br. 41., studeni 2012.

U EU i unutar nje - u Eurozoni, uspostavljaju se novi mehanizmi finansijske sigurnosti. Proces se odvija na tri razine. Prva je makroekonomski i monetarna – uključuje provedbu Fiskalnog pakta, reformu instrumenata ECB-a i uspostavu „europskog MMF-a“ – Europskog mehanizma stabilnosti (ESM-a). Druga je razina bankarske unije – zajedničkog nadzora banaka, osiguranja depozita i sustava za rješavanje problema u problematičnim bankama. Treća je razina prudencijalna i tiče se implementacije nove regulacije Basle III i drugih regulacija koje se bave poslovanjem banaka.

Ova analiza detaljno prikazuje novu regulaciju i institucionalne mehanizme koji su već usvojeni, kao i one o kojima se još uvijek raspravlja, ali je velika vjerojatnost da će uskoro biti prihvaćeni. S obzirom na skor ulazak Hrvatske u EU, analiza se bavi i važnošću ovih promjena

za Hrvatsku. Zaključuje da nove institucije predstavljaju dobru vijest za Hrvatsku: procijenjene koristi od novih sigurnosnih finansijskih mehanizama puno su veće od eventualnih finansijskih troškova koje bi Hrvatska nakon ulaska u EU i kasnije, nakon prihvaćanja eura, mogla imati zbog financiranja novih institucija finansijske stabilnosti.

REGULACIJA, TROŠKOVI I DOBIT BANAKA: Kao kad je kriza počela

Br. 42., prosinac 2012.

U prvih devet mjeseci ove godine zabilježen je pad standardnih indikatora profitabilnosti – povrata na kapital (ROE) i povrata na aktivi (ROA). Zabilježen je i pad kamatne marže zbog rasta troškova izvora sredstava, a novi je nalet krize doveo do daljnog kvarenja kvalitete plasmana.

U pogledu trendova i očekivanja za 2013. može se ponoviti prošlogodišnji zaključak koji je, zanimljivo, bio vrlo sličan zaključku iz 2010. za 2011. Stoga možemo govoriti o kontinuitetu krize kroz koju banke prolaze, nasreću, netaknute u pogledu solventnosti i stabilnosti, a što treba zahvaliti visoku iznosu angažiranog kapitala.

Zaključak analize stoga glasi: troškovi regulacije nemaju presudnu ulogu kao odrednice dobiti, a banke su vrlo dobro kapitalizirane, što im omogućava prolazak kroz krizu bez većih šokova, ako izuzmemo sada već stalni pritisak na kvarenje aktive i pad profitabilnosti.

TRESLA SE BRDA RODIO SE MIŠ: Razduživanje banaka u Hrvatskoj i drugih deset zemalja Nove Europe

Br. 43., ožujak 2013.

Razduživanje (engl. deleveraging) ili smanjivanje finansijske poluge logična je posljedica prezaduženosti. U aktualnoj krizi problem razduživanja uglavnom je vezan uz banke, osobito one koje su prije krize snažno povećale finansijsku polugu koristeći druge izvore osim depozita za financiranje kreditne ekspanzije. Te su banke u velikoj mjeri posredovale u pokretanju međunarodnih tokova

kapitala između Stare i Nove Europe prije izbijanja krize. Inozemna pasiva njihovih banaka kćeri u zemljama Nove Europe brzo je rasla, pa se nakon izbijanja krize pojavila zabrinutost da banke obratnim procesom – procesom razduživanja, ograničavaju ponudu kredita i oporavak na tržišta europskih zemalja u razvoju među kojima je i Hrvatska. Ova analiza istražuje ima li osnove za tu vrstu zabrinutosti, s posebnim osvrtom na situaciju u Hrvatskoj. Analiza pokazuje da problem razduživanja banaka nije velik, a da u Hrvatskoj u ovoj krizi nije imao posebnu ulogu.

MALA I SREDNJA PODUZEĆA:

Ipak oporavak kreditiranja 2013.?

Br. 44., svibanj 2013.

Produžetak krize negativno se odrazilo na poslovanje malih i srednjih poduzeća čiji rizici izrazito rastu. Slabu utjehu predstavlja činjenica da je problem identičan kao u cijeloj EU, gdje su krizom najviše pogodena mala i srednja poduzeća u trgovini i graditeljstvu.

Rast rizika znači otežano financiranje, a nastavak krize znači vrlo opreznu potražnju. To pak znači da kreditno tržište nema velike autonomne snage za pokretanje kreditnoga ciklusa. Loša je vijest i da su neke zemlje suočene s ovim problemom pokušale intervenirati posebnim kreditnim programima (npr. Velika Britanija), no oni nisu dali rezultata. Ta činjenica samo pokazuje koliko je teško poboljšati položaj malih i srednjih poduzeća u uvjetima krize.

S obzirom na intenzivno restrukturiranje i općenito nisku kapitaliziranost poduzeća, poticaji koji se oslanjanju samo na kreditne programe neće dati rezultata. Nužan je širi skup mjeru koje će olakšati poslovanje u ovom segmentu, ubrzati restrukturiranje, brže istaknuti one stabilne i perspektivne među malima i srednjima, te smanjiti kreditne rizike. Tek se nakon primjene takvih mjeru može očekivati da će kreditne politike dati rezultata. Dobra je vijest da banke u ovom trenutku očekuju početak oporavka kreditiranja segmenta malih i srednjih poduzetnika u 2013.

DRUŠTVENO ODGOVORNO POSLOVANJE

Osnivajući **Hrvatsku udrugu banaka (HUB)** 1999. kao krovnu udrugu kojoj je cilj štititi i promicati vrednote i interes banaka u Hrvatskoj banke su prepoznale snagu zajedničkog djelovanja. Tu snagu prenijele su i na koncept društvene odgovornosti u HUB-u. Od osnutka HUB-a banke zajedno djeluju u području društvene odgovornosti. Vrlo brzo članice Udruge prihvatile su i potpisale **Kodeks dobre bankovne prakse**. Sve nove članice potpisuju ga u trenutku pristupanja Udrudi.

Društvena odgovornost integracija je brige za pitanja društva i zaštite okoliša u poslovne aktivnosti i odnose s vlasnicima, dioničarima, zaposlenicima, potrošačima, vladom, medijima i širom javnošću. Banke općenito imaju dugu povijest društvene odgovornosti. Ono



što je specifično za bankovni sektor u Hrvatskoj jest činjenica da društvena odgovornost postaje dio integrirane strategije banaka, a ne njezin dodatak ili samo jedan od PR alata.

HUB je bio jedan od partnera u projektu uspostavljanja **Nacionalne mreže za društveno odgovorno poslovanje**. Sudionici projekta pripremili su i **Prijedlog nacionalne strategije** koju je Mreža predložila nadležnom ministarstvu na usvajanje i daljnje aktivnosti. Nacionalna mreža za DOP funkcioniра kao međusektorsko tijelo s predstavnicima svih relevantnih organizacija i institucija koje se bave promocijom nekog oblika DOP-a ili im je zbog prirode poslovanja blizak, a u 2013. Ministarstvo gospodarstva preuzeo je vođenje Nacionalne mreže. Više informacija nalazi se i na internetskim stranicama **DOP.HR**.

HUB je, uz više drugih organizacija, sudjelovao u pri-premi **Četvrte nacionalne konferencije o društveno odgovornom poslovanju**, koja je održana u travnju 2013. pod pokroviteljstvom predsjednika Republike Hrvatske, a glavni organizator bio je **HR PSOR** (Hrvatski poslovni savjet za održivi razvoj).

HUB sudjeluje u **Radnoj skupini za društvenu odgovornost Europske bankovne federacije (EBF)**, koja je, uz druge teme, uskladivala stavove nacionalnih udruga banaka o **Komunikaciji o korporativnoj društvenoj odgovornosti Europske komisije** (objavljena u listopadu 2011.) i koordinirala rad na Izvješću o društvenoj odgovornosti na razini EBF-a.

Sudjelovali smo u davanju primjedbi i prijedloga na **Nacionalni strateški okvir financijske pismenosti**, u sklopu Povjerenstva koje je predvodilo Ministarstvo financija. U veljači 2013. HUB je bio domaćin dviju međunarodnih udruga koje se bave financijskim obrazovanjem i financijskom pismenošću djece i mladih (Child & Youth Finance International i Aflatoun) te je organizirao sastanke s bankama i relevantnim dionicima kako bi ih upoznao s mogućnostima suradnje i aktivnostima.

U skladu s ciljevima podizanja finansijske pismenosti, u sklopu projekta **Upravljanje osobnim financijama**, nakon modula "Kako uskladiti primanja i troškove?", u veljači 2012. počele su radionice drugog modula pod nazivom "**Štednja i ulaganje: Mudro je imati informacije**" te su se nastavile i u 2013. godini. Radionice na slikovit način obrađuju osnovne finansijske pojmove i namijenjene su nestručnjacima. Svaku radionicu vode dva predstavnika iz različitih banaka. Radionice su jedan od primjera međusektorske suradnje i doniranja resursa poslovnog sektora zajednici.

HUB potiče vidljivost teme **socijalnog (društvenog) poduzetništva** sudjelujući u Radnoj skupini Ministarstva rada za izradu **Strategije razvoja socijalnog/društvenog poduzetništva 2014.-2020**. Organizirali smo sastanke banaka i stručnjaka za to područje radi podizanja razine znanja i međusektorske suradnje.

HUB sudjeluje u radu **Povjerenstva za alternativne načine rješavanja sporova pri Ministarstvu pravosuđa**, kojem je cilj poticati i mirenje (medijaciju) na nacionalnoj razini. U njemu sudjeluju i predstavnici regulatora, sudova te poslovnih organizacija i komora.

U projektu "**Life Long Learning**", koji sufinancira Europska komisija, a vodi ga UNI-Europa, sudjeluju BCE-
SA-EBF, EACB i ESBG (Banking Committee for Social Affairs - European Banking Federation, European Association of Co-operative Banks, European Savings Banks Group). Cilj mu je ujedinjavanje i širenje znanja iz područja cjeloživotnoga učenja u području bankarstva, kao unapređenje **Deklaracije o cjeloživotnom učenju iz 2003.** uz promoviranje **socijalnog dijalog-a**, posebice u Rumunjskoj, Bugarskoj i Hrvatskoj. U sklopu projekta održavane su radionice za nacionalne socijalne partnerne i u Zagrebu te u Bukureštu i Sofiji.

HUB redovito surađuje na temama društvene odgovornosti s relevantnim dionicima kao što su Hrvatska udruga poslodavaca (HUP) i Hrvatski poslovni savjet za održivi razvoj (HR PSOR).

KODEKS DOBRE BANKOVNE PRAKSE



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

- postave 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 BANKOVNE PRAKSE (u daljem 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. Prihvaćanjem Kodeksa banke postavljaju standard dobre bankovne prakse kojega se pridržavaju kao minimuma u svom poslovanju, a tržišna utakmica i snage koje oblikuju i upravljaju tržištem poticat 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 bankovnih informacija
- 2.4. Objektivnost u poslovanju s klijentima
- 2.5. Kompetentna primjena novih znanja

2.6. Sigurnost i pouzdanost bankovnih 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 bankovni 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 ospobi svoje zaposlenike i suradnike kako bi u svakom pogledu i cijelovito 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 cijelini, pa njihov međusobni odnos unutar banke mora biti zasnovan na suradnji, međusobnom poštovanju i pomoći.

4. Bankovne 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 bankovne usluge, kamatne stope i druge informacije dostupne su u svim poslovcicama. Banka se obvezuje dostavljati osnovne podatke i promjene Hrvatskoj udruzi banaka kako bi jednoobrazno bili dostupni javnosti.

4.3. Bankovne komunikacije, oglašavanje i ostale marketinške aktivnosti moraju biti jasne, istinite i nedvosmislene. One ne smiju zavestiti 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 njenoj usluzi, proizvodu ili tehnologiji, radi korektnog ostvarivanja ekspanzije na tržištu.

5. Zaštita klijenata

5.1. Poslovanje banaka ne služi samo provođenju bankovnih transakcija, jer one su sastavni dio gospodarskog i socijalnog okružja. Zbog toga banka brani integritet bankovnog sustava u cjelini te štiti prava i interesu štediša, dužnika i dioničara, jednako kao i vlastite interese i interesu svojih zaposlenika. Banka je svjesna odgovornosti u osiguravanju transparentnosti i regularnosti financijskih tokova.

5.2. Svi podaci o bančnim klijentima i o poslovnim partnerima, kao i vrijednosni sudovi stečeni radom s klijentima, smatraju se bankovnom tajnom, čak i kad 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 poštovanja 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. Kad 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 zadowoljstvo. Banka internim pravilima određuje postupak podnošenja i način rješavanja pritužbi klijenata.

5.7. U slučajevima finansijskih 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 izbjegići 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 bankovna industrija u cjelini. Budući da su sve banke - koje su usvojile Kodeks - prihvatile postavke dobre bankovne prakse, svaka je banka spremna pružiti dru-

goj banci potpisnici Kodeksa pomoći, 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 uz nastojati naći rješenje konstruktivnim dijalogom, temeljenim na principima dobre bankovne prakse. Ako direktni dijalog dviju (ili više) strana ne dovede do rješenja, banke će pokušati spor rješiti 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 bankovne prakse u svom poslovanju.

7.3. Izmjene i dopune Kodeksa provode se na inicijativu bilo koje članice Hrvatske udruge banaka, a moraju ih jednoglasno prihvatići sve članice da bi stupile na snagu 30 dana nakon prihvaćanja.

7.4. Tekst Kodeksa dostupan je javnosti na internet-skim stranicama Hrvatske udruge banaka:
www.hub.hr.

8. Potpisano 27. studenog 2000. godine u Zagrebu

CROATIAN BANKING ASSOCIATION

2013

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 client's trust in banking



FOREWORD



THE ECONOMIC ENVIRONMENT

We believed that in this year's Foreword we would not have to touch upon the deepening of the recession for the fifth year in a row. However, it appears that we will still need to wait for positive messages. There are signs of recovery; the only question is when they will pick up momentum. The banks themselves cannot create economic growth, though they are ready to support it by increasing credits and by lowering interest rates.

This support will be even stronger if the necessary structural reforms are carried out and entrepreneurial activity stimulated. As well as the majority of Croatia's citizens, the banks have been waiting for this for years. Until this happens, they will continue to do all they can to preserve financial stability, to ensure unhindered functioning of the fundamental payment system flows and, above all, to guarantee the security of accounts and savings of the Croatian citizens.

The Croatia's accession to the European Union will certainly be a stimulus for the nation's recovery, as the Croatian economy is now an integral part of the world's largest and most developed economic area, in which barely 7% of the world's population generates more than a quarter of the global product. With the easing of operations for Croatian companies in the EU and fewer barriers to EU companies for operating in Croatia, the perception of Croatia in the eyes of investors as a stable country, with harmonized legislation is important. This could lead to greater investments on the one hand, while reducing the differences and risk perception of the country on the other, and this will spill over into a convergence of interest rates. More detailed reports on the international comparisons and elements making up interest rates can be found in the CBA analyses.

REGULATING CONSUMER PROTECTION

In recent years, there have been more intensive efforts on consumer protection, including regulation. Considering that this is a very important topic, the Croatian Banking Association actively participates in all public debates. We believe that one of the key elements in consumer protection is the increased competitiveness in the market, which at least in the banking sector in Croatia, is very dynamic. Competing for each client, a consumer always wins, because she/he has the right and possibility to choose which bank to give its business to, which form of financing to request, and which plans to realize.

In excessive regulation, stipulations and restrictions, there is the threat that the opposite effect is achieved, and that individual loans become less accessible to certain consumer segments. This reduces their security and increases the risk of turning to the illegal market, and therefore, the appropriate caution should be taken and best global practices applied.

Unlike some other service activities, banks have the least interest in forced collection from clients, thus losing the chance for a long-term business relationship. In recent years, numerous restructuring measures and loan refinancing options have been introduced, allowing each individual citizen to try to find the right solution until the country is out of the economic crisis.

BANK STABILITY IS OF INTEREST TO SOCIETY

The Croatian banks are among the few in Europe that did not require government aid during the most serious financial crisis. Our banks remained among the best capitalised banks in Europe. For that reason, they were able to increase financing to the government during the initial stages of the crisis escalation. Banks thereby assisted in the normal execution of public function and the achievement of social policy goals. Then they significantly increased financing to clients, supporting creditworthy clients, especially those requiring an increased financial support to weather the effects of the crisis. In European terms, Croatia was an exception, as an economy that lost 10% of its GDP in a five-year period, while increasing financing to the private sector by more than 15%.

During that time, loans to households stagnated. On the demand side, this indicated caution by the population, resulting in reduced demand. On the supply side, through the application of international banking regulations requiring increased capital reserves and bigger risk provisions on existing loans, the 'appetite' for risk was forcibly reduced in comparison to the years preceding the crisis.

According to central bank's data, the banks directly employed about 22,000 people. Among these, there is an above-average share of highly skilled staff. Their work and knowledge is on the same level as the work and knowledge of their colleagues from the most developed EU Member States. Because of these people it is no wonder that this crisis showed that banks do not maximize their short-term gains, but instead the long-term gains. The strategic focus on long-term gains means that banks are fully aware that it is better to achieve lower returns on capital in a better off country than a higher return in an impoverished one.

CBA IN THE EUROPEAN UNION

With Croatia's accession to the EU, the Croatian Banking Association will become a full fledged member of the European Banking Federation (EBF) and the European Payment Council (EPC). In addition to all the rights these memberships bring, they also bring additional obligations to participate in the decision-making of their main bodies, committees and working groups.

The banks in Croatia adopted principles of corporate social responsibility (CSR). Besides activities described in chapter on CSR, we can be proud that the banks operate competitively, while abiding by all the rules of internal market, and will be equal participants in the European Union market.

Zoran Bohaček
managing director

CROATIAN BANKING ASSOCIATION STRUCTURE



Working Group for Security and Protection in Banks



Public Relations Working Group



E-invoicing Working Group



Ad hoc working groups

	Committee for Legal and Institutional Matters
	Assets and Liabilities Management Committee
	Payment Systems Committee
	Card Committee
	Information Exchange Committee
	Risk Management Committee
	Building Societies Committee
	Compliance Committee
	Anti-Money Laundering Committee
	Marketing Communications Committee
	EU Funds Committee
	Banking Mediation Committee
	Social Responsibility Committee
	Information Security Committee
	Chief Economists Club

ABOUT US



With a view to improving our efficiency, the Croatian Banking Association has set up a number of professional committees and subcommittees, and other permanent or provisional bodies. Experts from banks are actively involved in the membership of committees and working groups. Some committees meet on a regular basis, as they deal with very dynamic areas, while others meet as the need arises, i.e. depending on the importance of the topic to be discussed. The following is an outline of the main tasks and activities of particular CBA committees and working groups.

COMMITTEES



Committee for Legal and Institutional Matters - Members of this Committee are legal professionals from member banks, who are tasked with starting legal initiatives of interest to legal structures in the CBA member banks. They put forward proposals to the Executive Committee and other CBA bodies. One of their crucial roles is to provide opinions and positions on any legal acts and by-laws pertaining to the banking business. Members of this Committee are also involved in the work of other CBA bodies.



Assets and Liabilities Management Committee - The membership of this Committee consists mostly of bank treasury managers, and their main task is to consider measures in the field of central banking operations. In addition to the cooperation with the CNB, this Committee also cooperates with HANFA (Croatian Financial Services Supervisory Agency), the Ministry of Finance and ACI Croatia.



Payment Systems Committee - Since its establishment, the Payment Systems Committee has been very active in resolving open issues in the functioning of payment transactions in Croatia. The fundamental task of the Committee is to launch initiatives of interest for the functioning of payment transactions among member banks. The Committee has six working groups that deal with technical and operative issues. Under the new Payment Transactions Act, work on standardization has become intensive. A new universal payment slip (HUB-3) and a new national payment slip (HUB-3A) have been developed. Standardization of databases for the exchange of data with clients, FINA, government bodies and all participants in payment transactions is underway. The Payment Systems Committee is slowly taking over work on tasks previously handled by the Foreign Exchange and International Payments Committee. Within the frame of this committee, the Single Euro Payment Area (SEPA) Working Group was formed to prepare for the implementation of SEPA in Croatia. In May 2013, the National Payment Systems Committee (NPSC), in which CAB has four representatives, passed a decision on the establishment of the Croatian Committee for SEPA Coordination (CCSC). Under the leadership of HUB, this committee will prepare for the successful transition to SEPA standards and technical requirements by the final deadline, 31 October 2016.



Card Committee - Members of the Card Committee are principal members of MasterCard International and VISA International (Zagrebačka banika d.d., Privredna banka d.d., Erste & Steiermarkische bank d.d., SG Splitska banka d.d., Raiffeisenbank Austria d.d., Hrvatska poštanska banka d.d., Hypo Alpe-Adria-Bank d.d., Banco Popolare Croatia d.d.) and the card companies: PBZ Card d.o.o. and Erste Card Club d.d. The scope of this Committee includes non-competitive areas of card operations, such as:

security, technology, legal matters and chargeback, at the level of the MC, VISA, AmEx and Diners brands. The Committee also includes the Security Commission, Technology Commission, Legal Commission and Chargeback Forum.



Information Exchange Committee

This Committee was set up with a view to establishing an Information Exchange System featuring information about bad debtors. The purpose of the System is to minimise risks connected with credit products, collection, monitoring, and risk control. Participants in the information exchange have to act responsibly and apply all measures aimed at ensuring security and confidentiality in accordance with regulations and internal acts.



Risk Management Committee - Set up at the end of 2007, the main tasks of this Committee include a transparent selection of best practices in the field of risk management on the Croatian banking market, a joint representation before the CNB and possibly a joint approach in dealings with European associations, consolidation of views at the level of the entire banking system regarding relevant elements of the future Basel II consolidated legal regulation (the area of national discretions), and the exchange of know-how between Committee members. The Committee has three subcommittees: Credit Risks Subcommittee, Operational Risks Subcommittee, and Market Risks Subcommittee.



Building Societies Committee was set up in 2007, bringing together all five building societies on the Croatian market: Prva stambena štedionica, PBZ stambena štedionica, Raiffeisen stambena štedionica, Wüstenrot stambena štedionica and HPB stambena štedionica. Due to the particular

nature of their operations and problems they encounter, building societies decided to communicate their views through the CBA in order to stop negative trends in amending legal regulations which make it impossible to meet the conditions under which the building societies were first established some ten years ago and conduct business with stability and profit.



Compliance Committee - This Committee was established in 2010. Compliance is a relatively new concept in banking, introduced 4-5 years ago, regulated by law and implemented in banking operations. Considering that the primary function committee in banks is to monitor that all policies and procedures are compliant with the legislation, i.e. that one law does not derogate another, this committee works very closely with others and follows their work.



Anti-Money Laundering Committee - This Committee gathers banking employees authorised for the prevention of money laundering, and their deputies. Considering the particular nature of the issue of money laundering, the Committee actively engages in discussions, provides opinions and recommendations regarding a number of regulations, decisions, guidelines and the like, and encourages the resolution of matters singled out as high priority in practice.



The Marketing Communications Committee was established in May 2009 and it is entrusted with the analysis of the current market communication regulations, monitoring of the Croatian regulations and development of self-regulation based on the code of professional conduct, with respect for the best experience from the international practice. The banking industry, like other stakeholders in market communications, is facing demanding market cir-

cumstances and very intensive and deep changes in the Croatian regulations rapidly governing the areas of advertising, market communication and marketing in general. The principal reason for the new, more demanding rules of the game for advertisers is in the fact that the Croatian legislation was in an accelerated process of alignment with the EU *acquis communautaire*, to speed up the process of EU accession.

The Committee adopted the Code of Advertising with a minimum recommended standard of market communication for members of the CBA, but also the banking industry as a whole. This will definitely facilitate and bring the entire "production process" in the market communication segment to a higher quality level and improve the cooperation among the banks as advertisers, market communication agencies and the general public.



The EU Funds Committee has been set up to coordinate efforts by CBA members in preparation and development of an operational national competition program for utilisation of EU funds. The aim is to exchange banking experience, through proposals and activities, in cooperation with other stakeholders, and thus facilitate the successful utilisation of EU funds.



The Banking Mediation Committee was established at the end of 2010. Its primary task is to propose and carry out activities within the framework of the Banking Mediation Centre and to monitor the Centre's work following its establishment. The Committee may launch initiatives of interest for the mediation process, and give opinions and recommendations on topics in the area of mediation or other out-of-court dispute resolution.



Social Responsibility Committee has set as its basic task an active role in the improvement of the CSR awareness and culture. Banks taking part in the Committee aim to upgrade all their activities with the continuous education concerning CSR topics. CSR is increasingly becoming a broad area within the banking operations that is integrated into the corporate management. The Committee has established the cooperation with the Croatian Bank for Reconstruction and Development (CBRD), whose representative takes part in the Committee as an external member.



Information Security Committee was established in early 2012 to represent the interests of Croatian banks in the field of IT security, both in Croatia and abroad. It is engaged in organizing joint activities for the improvement of IT security, development of risk management system regarding risks from the misuse of information and information channels, as well as preparation and providing incentives for the formation of a legal and statutory framework concerning the IT security in Croatia.



The Chief Economists Club was established to promote the roles of chief economists in Croatian banks, for the exchange of experiences and communication of common positions. The six largest Croatian banks have chief economists and/or persons responsible for strategic development, and via the Club, they conduct occasional surveys to convey their opinion on the most important economic trends and expectations.

WORKING GROUPS



Working Group for Security and Protection

in Banks - The members of this Group engage in active discussions and exchange opinions on the principles of technical and physical security of banks. It regularly cooperates with the Ministry of the Interior, particularly in the yearly organisation of seminars on trends in bank robberies and matters pertaining to subordinate legal acts. At the proposal of a member bank, the CBA presents an Annual Award to an organisational unit of the MI which has deserved the most credit for resolving a criminal act of robbery committed against a member bank. Considering that seven years has passed since the last amendment of the Act on Minimum Security Measures in Cash and Securities Operations and several of its ordinances, at the initiation of this CBA Working Group, the Minister of the Interior accepted the establishment of a broader working group with all stakeholders, aimed at proposing amendments to the existing Act, or to work on a new act. The Working Group was activated in 2012 after multiple consultations, a draft of the new Act on the Protection of Monetary Institutions was proposed, and is planned for adoption in the third quarter of 2013.



The Public Relations Working Group

gathers communication managers and PR managers of member banks. The aim is to provide solutions and recommendations for PR challenges facing banks and the CBA. The Working Group has been intensively processing current topics related to the banking sector and providing guidance for efficient communication with media and the public in a period of global financial crisis and major challenges for the banking industry as a whole. Thus the role of PR function of the CBA is further strengthened as a "spokesperson" of the entire sector.



The E-invoicing Working Group has been engaged in the standardisation of e-payments and the e-CBA payment form. It was established in 2008 with the cooperation of the state, academic institutions and the private sector as the Committee for e-invoicing, which had two subcommittees – a technical committee and a business committee. Bank representatives were represented in both committees, and the committees prepared and presented a series of solutions. The CBA managing director is a member of the National Council for E-Business (NCEB) and actively participates in the adoption of the legal requirements for e-invoice to become a fully legal and practical replacement for hard-copy invoices. The greatest barrier to this was removed with the amendments to the VAT Ordinance in mid 2011, though implementation and supervision are still being defined. During 2012, the NCEB replaced the Committee for E-invoicing with the National Multi-stakeholder Forum for E-invoicing and its working groups, which transposed the similarly established forum at the EU level. Accession into the EU also means full alignment with Directive 2010/45, which makes hard-copy and e-invoices fully equivalent. Prior to this, though, we are aiming to remove the final barriers, both legal and technical, to ensure its rapid implementation into general use in the Republic of Croatia.



Ad hoc working groups - These are working groups which meet occasionally to deal with specific problems and issues as they arise. Usually set up for a short term, these groups try to offer proposals or solutions to competent Committees or the Executive Committee of the CBA.

CBA ANALYSES



The Croatian Banking Association has launched the CBA Reviews, a quarterly publication that now regularly analyses topics such as sources of bank funds, placements, interest rates, regulation costs, earnings, capitalisation and risks, which we previously discussed once a year within the CBA Analysis. HUB Reviews can be accessed on our website at www.hub.hr

FISCAL POLICY IN CROATIA AND THE EU: The course is good, but the stride is too short

No. 38, July 2012

Croatia's fiscal policy remains unsustainable, as analyses in the past two years have shown. However, unlike prior analyses, for the first time we are registering steps in the right direction. A mild adjustment of the primary fiscal balance was recorded in 2011, for the first time since the start of the crisis. The new government strengthened the adjustment and drafted its course to 2014 when, thanks to the Act on Fiscal Accountability, the primary fiscal balance is expected to approach zero.

Though the fiscal course is good, the stride might be too short. In conditions in which it is realistic to expect unfavourable, or at least insufficiently stimulatory international environment, the necessary fiscal adjustment should be greater than envisaged in the three-year budget 2012–2014 because the Croatian public debt will continue its uncontrolled growth, which by the end of the mandate of this government could lead Croatia into a dangerous fiscal zone.

On the other hand, consistent implementation of the Act on Fiscal Accountability, for which there is still an objective chance, would contribute to preserving the credit rating. After this, a gradual reduction in the costs of financing could be expected. This could occur in the most favourable possible political moment, after our accession to the EU. In this way, a political and economic constellation could be formed in just over a year, in which Croatia could draw significant 'development dividends'.

BANK OPERATIONS 2011/2012: The return of negative trends with exceptionally high capitalisation

No. 39/40, September 2012

The Croatian banking system currently has the highest ratio of capital adequacy in Europe, and can be deemed exceptionally safe. However, the first signs of growth of activity and profitability that were registered at this time last year have since disappeared. The demand for loans has been damped in line with the somewhat weaker economic trends than expected in the second quarter of 2012.

It is no surprise that bank profits are declining under such conditions. For that reason, the rate of return on equity in Croatian banks is again lower than the yields on the long-term kuna government bonds. The return is among the lowest in comparison with European countries which did not experience banking difficulties in this crisis.

There is not a great amount of breathing room to find a policy and tactic to change this status. Increasing cost efficacy is limited and requires time, and since the reservations for losses continue to absorb 40–50% of the net results prior to reservations, it is obvious that the next changes will only take place once that ratio is substantially reduced. For now, there are no indications that such a decrease will occur soon. Finally, the arrival of such a situation depends least of all on the banks themselves.

NEW EUROPEAN ARCHITECTURE OF FI- NANCIAL STABILITY: Strengthening the foundations

No. 41, November 2012

In the EU and within the Eurozone, new financial safety mechanisms are being established. This process is taking place at three levels. The first is at the macroeconomic and monetary level – including the implementation of the Fiscal Pact, reform of the ECB instruments and establishment of the 'European IMF' – the European Stability Mechanism (ESM). The second level is the banking union, with joint control of banks, insuring deposits and a system for resolving problems in banks in difficulty. The third level is prudential and concerns the implementation of new regulations Basel III and other regulations concerning bank operations.

This analysis gives a detailed overview of the new regulations and institutional mechanisms that have already been adopted, like those still under debate but with a great likelihood that they will soon be adopted. With regard to Croatia's upcoming entry into the EU, the analysis deals with the significance of these changes for Croatia. The conclusion is that these new institutions represent good news for Croatia: the assessed benefits from the new financial safety mechanisms are much greater than the possible financial costs that Croatia will have after accession and later, after introducing the euro.

BANK REGULATION, COSTS AND PROFIT: As when the crisis started

No. 42, December 2012

In the first nine months of this year, a drop was recorded in the standard indicators of profitability – return on equity (ROE) and return on assets (ROA). A drop in the interest rate margin due to growing costs of sources of funding was recorded, and a new wave of the crisis led to further deterioration of the quality of assets.

In the sense of trends and expectations for 2013, last year's conclusions could be repeated which, interestingly, were very similar to the conclusions for 2010 and 2011. There is continuity of the crisis through which the banks are passing, fortunately, unscathed in the sense of liquidity and stability, which is due to the high levels of engaged capital.

The costs of regulation have no critical role in determining profits, and the banks are very well capitalized, which has allowed them to sail through the crisis without greater shocks, with the exception of the now constant pressure on the deterioration of assets and declining profitability.

A WHOLE LOT OF NOISE FOR NOTHING: The deleveraging of banks in croatia and ten other countries in the New Europe

No. 43, March 2013

Deleveraging is the consequence of over-indebtedness. In the current crisis, the problem of deleveraging is primarily tied to the banks, particularly those which, prior to the crisis, strongly increased their financial leverage by using other sources other than deposits to finance credit growth. These banks largely mediated flows of international capital between the Old and New

Europe prior to the outbreak of the crisis. The foreign liabilities of daughter banks in the countries of New Europe grew quickly, and after the outbreak of the crisis, concern arose that the banks would start the opposite process – the process of deleveraging to limit the supply of loans and recovery on the markets of developing European nations, including Croatia. This analysis investigates whether there is foundation for this concern, with a special focus on the situation in Croatia. The analysis shows that the issue of bank deleveraging is not a problem, and that it did not play a particularly important role in this crisis in Croatia.

SMALL AND MEDIUM ENTERPRISES: A recovery of lending in 2013?

No. 44, May 2013

The continuation of the crisis has negatively reflected on the operations of small and medium enterprises, whose risks have grown markedly. The fact that this problem is widespread throughout the EU, where the crisis has hit small and medium enterprises in trade and construction hardest, is of little consolation.

The growth in risk means more difficult financing, and the continuation of the crisis means cautious demand. The result is that the credit market does not have great autonomous power to get the credit cycle moving. Bad news is that some countries faced with this problem (e.g. Great Britain) have attempted to intervene with special credit programmes, though these have failed to give results. That fact only proves how difficult it is to improve the position of small and medium enterprise under crisis conditions.

With regard to the intensive restructuring and generally low capitalisation of enterprises, incentives based only on credit programs will not give results. A broad set of measures that will ease operations in this seg-

ment, accelerate restructuring, bring those stable and promising enterprises to the forefront and reduce credit risk are necessary. Only after the application of such measures can the credit policy be expected to have results. Good news at this time is that the banks are expecting the start of recovery of lending in the segment of small and medium enterprises in 2013.

CORPORATE SOCIAL RESPONSIBILITY



Through the establishment of the **Croatian Banking Association (CBA)** in 1999 as the umbrella organisation intended to protect and promote the values and interests of banks in Croatia, the banks have recognised the strength in working together. This strength has been applied to the concept of corporate social responsibility of the CBA. Since the Association's establishment, banks have been working together in the area of corporate social responsibility. Very quickly, the Association members accepted and signed the **Code of Good Banking Practice**. All new members are required to sign the Code upon their entry into the Association.

Corporate social responsibility is an integration of the concern for issues of society and environmental protection in business activities and relations with owners, shareholders, employees, consumers, government, the media and the general public. Generally speaking, banks have a long history of social responsibility. What is specific to the banking sector in Croatia is the fact that social responsibility is becoming an integral strategy of banks, and not just an add-on or a PR tool.

The CBA was one of the partners in establishing the **National Platform for Corporate Social Responsibility (CSR)**. Participants in the project have prepared the **Proposal of National Strategy**, which the Platform proposed to the ministry for adoption and further activity. The National Platform for CSR functions as an intersectoral body, with representatives of all relevant organisations and institutions that deal with the promotion of any form of CSR, or which are relevant due to the nature of their business. In 2013, the Ministry of the Economy took over the National Platform. More information is available at the website www.dop.hr.

Alongside other organisations, the CBA participated as a partner organisation in preparing the **Fourth National Conference on Corporate Social Responsibility**, held in April 2013 under the auspices of the Presi-

dent of the Republic of Croatia. The main organiser was the **Croatian Business Council for Sustainable Development (CBCSD)**.

The CBA participates in the **Working Group for Social Responsibility of the European Banking Federation (EBF)**. Among its topics of discussion, the Working Group aligned the positions of the national bank associations on the **Communication on Corporate Social Responsibility of the European Commission** (published in October 2011), and assisted in creation of the EBF CSR Report.

We participated in giving our comments and recommendations on the **National Strategic Framework of Financial Literacy**, as part of the Commission led by the Ministry of Finance. In February 2013, the CBA hosted two international organisations that deal with financial education and financial literacy among children and youth (Child & Youth Finance International and Aflatoun), and organised meetings with banks and relevant stakeholders in order to acquaint them with the possibilities of cooperation and activities.

In line with the objectives to increase financial literacy, within the project of **Managing Personal Finance**, after the module entitled "How to Balance Earnings and Expenditures?", workshops of the second module "**Savings and Investment: It is Wise to Have Information**" began in February 2012 and continued into 2013. The workshops, intended for non-experts, addressed the basic finance concepts in a graphical manner. Each workshop was led by two representatives from different banks. The workshops were an example of intersectoral cooperation and donating resources of the business sector to the community.

The CBA stimulates the visibility of the topic of **social entrepreneurship** by participating in the Working Group of the Ministry of Labour for the drafting of **Strategy for Development of Social Entrepreneurship 2014–2020**. We organised meetings between

banks and experts in this area in order to raise awareness, level of knowledge and intersectoral cooperation.

The CBA participates in the **Commission for Alternative Dispute Resolution of the Ministry of Justice**, which is aimed at stimulating mediation at the national level. Representatives of regulatory bodies, courts and business organisations and chambers also participate in this Commission.

The "**Life Long Learning**" project, co-financed by the European Commission, is led by UNI-Europe, with the participation of the Banking Committee for Social Affairs - European Banking Federation (BCESA-EBF), European Association of Co-operative Banks (EACB), and the European Savings Banks Group (ESBG). The project is aimed at uniting and disseminating knowledge from the area of lifelong learning in the field of banking, and to advance the **Declaration on Life Long Learning from 2003**, while also promoting **social dialogue**, especially in Romania, Bulgaria and Croatia. Workshops for national social partners were held in Zagreb, Bucharest and Sofia as part of the project.

The CBA regularly cooperates on topics of social responsibility with relevant stakeholders, such as the Croatian Employers' Association (CEA), Croatian Business Council for Sustainable Development (CBCSD) and many others.



CODE OF GOOD BANKING PRACTICE



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 knowhow 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 cooperation, 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.

cal. 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 cooperation 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 accept-

ed 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 www.hub.hr.

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

Revidirani podaci za banke

na dan 31. prosinca 2012., u tisućama kuna i postocima

Redni broj / Ranking by total assets	Naziv banke / Bank – CBA member	Ukupna aktiva / Total assets	Udio u ukupnoj aktivi / Share in total assets	Rast aktive / Assets growth	Dobit (gubitak) prije oporezivanja / Pre-tax income (loss)	Stopa adekvatnosti jamstvenog kapitala / Capital adequacy ratio	Jamstveni kapital / Regulatory capital
1.	ZAGREBAČKA BANKA d.d.	104.136.413	25,56	0,12	1.103.585	23,63	15.165.161
2.	PRIVREDNA BANKA ZAGREB d.d.	68.950.352	16,93	1,40	1.030.213	21,75	10.518.107
3.	ERSTE & STEIERMÄRKISCHE BANK d.d.	58.687.201	14,41	2,56	598.161	17,41	5.522.709
4.	RAIFFEISENBANK AUSTRIA d.d.	35.699.773	8,76	-8,00	432.149	18,30	4.741.646
5.	HYPÖ ALPE-ADRIA-BANK d.d.	34.693.455	8,52	-15,56	326.492	30,19	7.492.947
6.	SOCIÉTÉ GÉNÉRALE-SPLITSKA BANKA d.d.	26.431.406	6,49	-1,63	129.753	17,63	3.716.459
7.	HRVATSKA POŠTANSKA BANKA d.d.	17.058.383	4,19	3,68	93.762	14,89	1.668.626
8.	OTP BANKA HRVATSKA d.d.	13.374.792	3,28	4,19	127.604	16,04	1.451.019
9.	SBERBANK d.d.	8.232.797	2,02	9,57	-171.710	23,30	1.414.135
10.	KREDITNA BANKA ZAGREB d.d.	3.202.496	0,79	18,37	20.689	13,96	327.951
11.	PODRAVSKA BANKA d.d.	3.067.680	0,75	4,98	10.214	17,00	429.823
13.	ISTARSKA KREDITNA BANKA UMAG d.d.	2.681.664	0,66	5,54	21.496	15,40	261.230
14.	BANCO POPOLARE CROATIA d.d.	2.571.632	0,63	-4,20	3.435	16,83	317.903
17.	KARLOVAČKA BANKA d.d.	1.781.948	0,44	-4,07	-25.511	12,77	138.311
18.	CENTAR BANKA d.d.	1.571.033	0,39	-1,83	-76.250	14,12	259.606
20.	PARTNER BANKA d.d.	1.295.165	0,32	-1,73	-22.384	14,14	166.186
21.	VENETO BANKA d.d.	1.294.443	0,32	12,84	-16.202	20,76	184.153
25.	BANKA KOVANICA d.d.	1.067.140	0,26	-4,84	-63.158	10,22	101.677
26.	KENTBANK d.d.	608.373	0,15	15,02	-29.249	18,60	78.865
Ukupno za sve banke		386.406.146			3.493.088		53.877.651
			2012.				
1.	ČLANICE HUB-a / CBA MEMBERS	386.406.146	96,62%	-1,82%	103,01%		96,55%
2.	UKUPNO HRVATSKA / TOTAL CROATIA	399.915.727		-1,73%	3.390.890	20,89	55.800.267
			2011.				
1.	ČLANICE HUB-a / CBA MEMBERS	393.563.080	96,71%	4,43%	100,45%		96,52%
2.	UKUPNO HRVATSKA / TOTAL CROATIA	406.964.951	100,00%	4,06%	4.363.757	18,79	54.428.756
			2010.				
1.	ČLANICE HUB-a / CBA MEMBERS	376.856.863	96,36%	2,21%	100,10%		96,20%
2.	UKUPNO HRVATSKA / TOTAL CROATIA	391.088.069	100,00%	2,23%	4.224.552	16,43	52.556.598

Audited Data on Banks

on 31 December 2012 in thousand kuna and percent

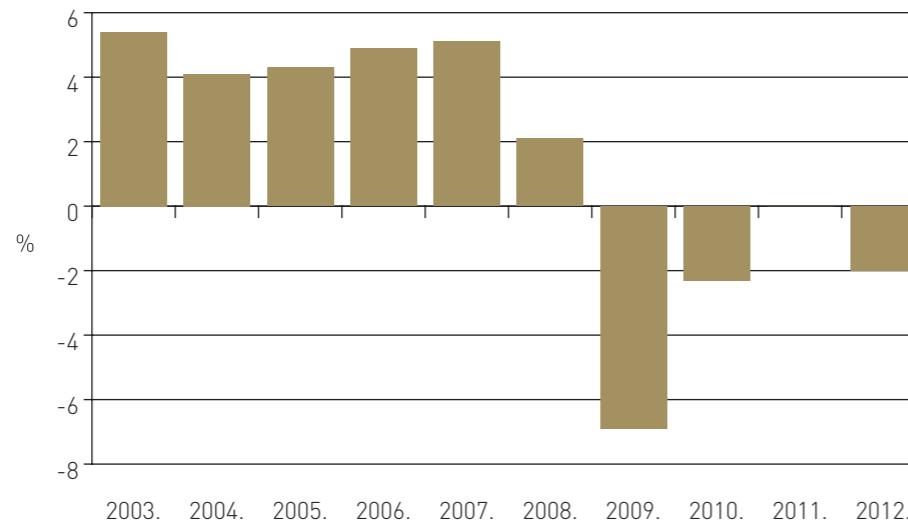
ODABRANI STATISTIČKI POKAZATELJI BANKOVNOG SUSTAVA I MAKROEKONOMSKIH KRETANJA

SELECTED BANKING SECTOR STATISTICS AND MACROECONOMIC INDICATORS

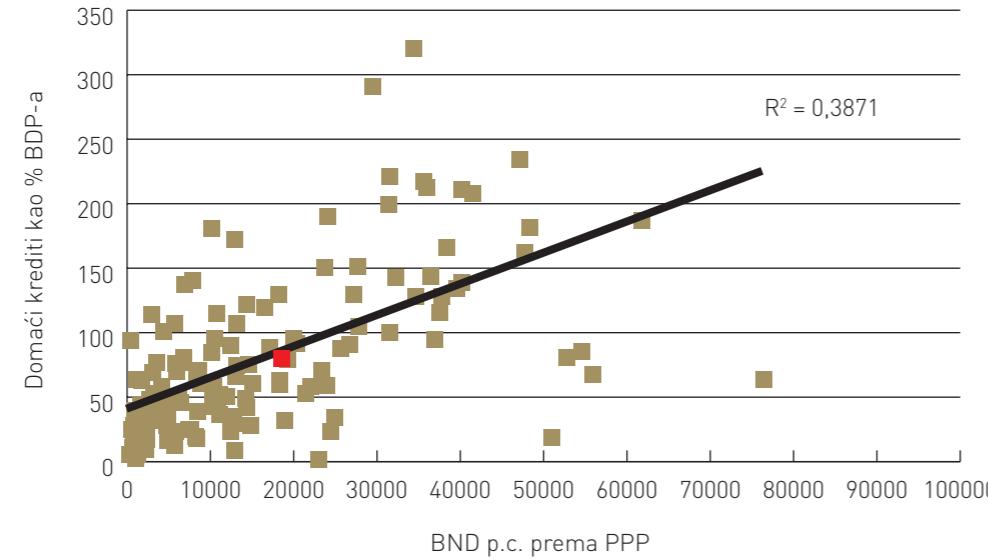


Izvor podataka / Hrvatska narodna banka
Data source / Croatia National Bank

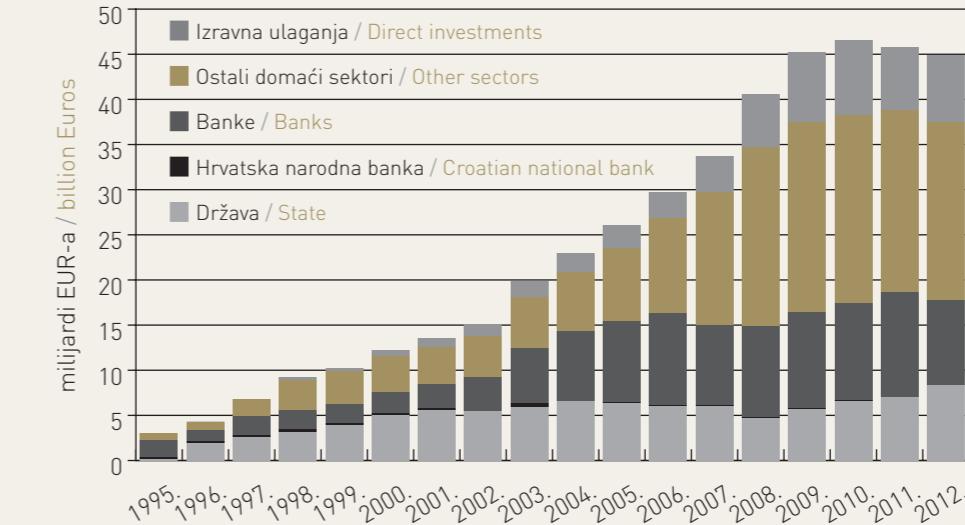
Stopa rasta realnog BDP-a /
Real GDP growth rates



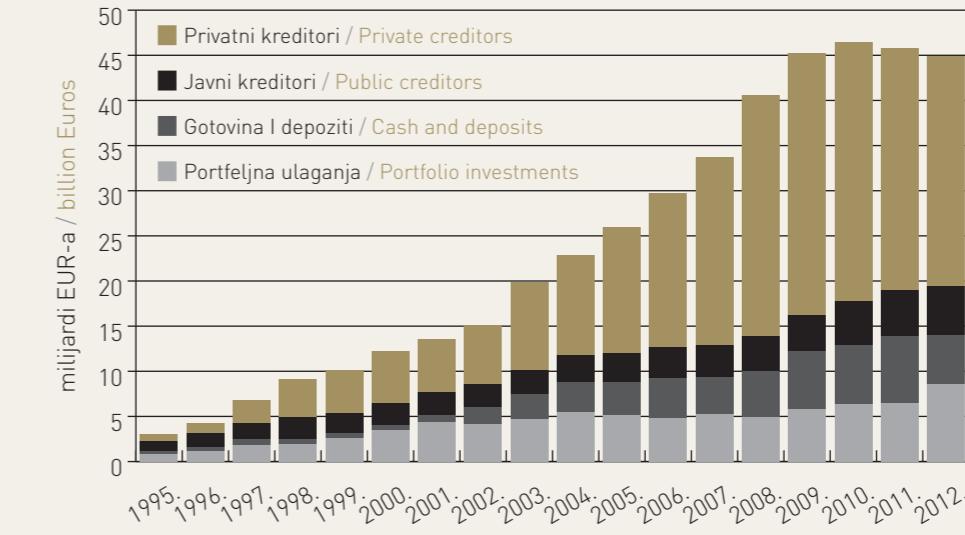
Domaći krediti / BDP
naspram BDP
po stanovniku
prema PPP /
Domestic credit/
GDP per capita



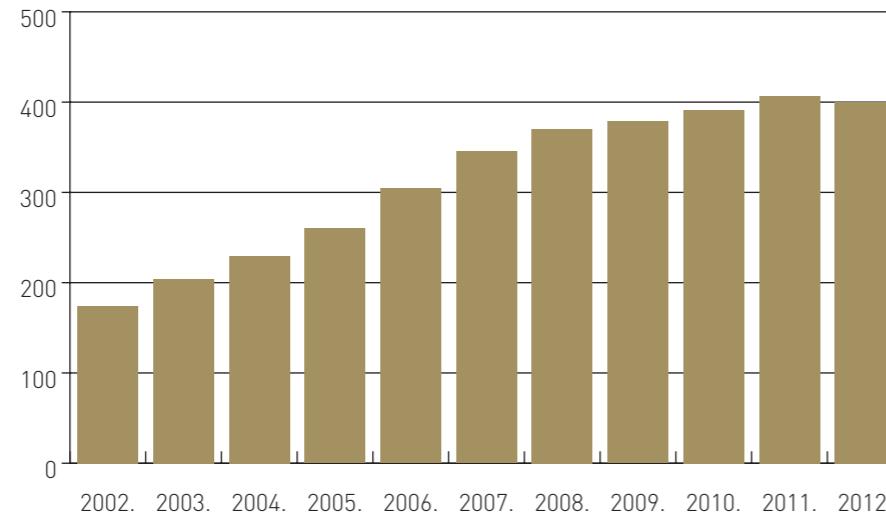
Inozemni dug RH
prema sektoru
dužnika /
External debt,
debtor



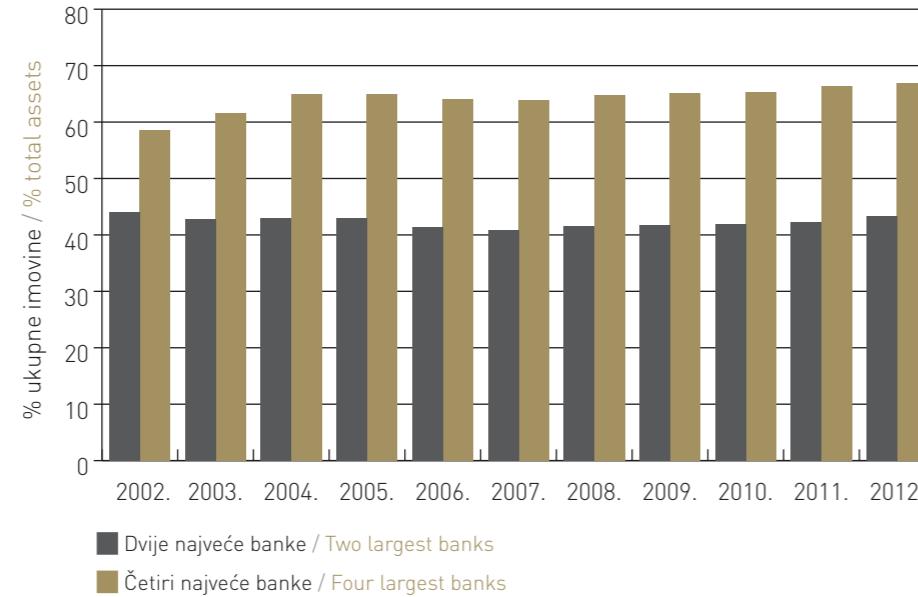
Inozemni dug RH
prema sektoru
kreditora /
External debt,
creditor



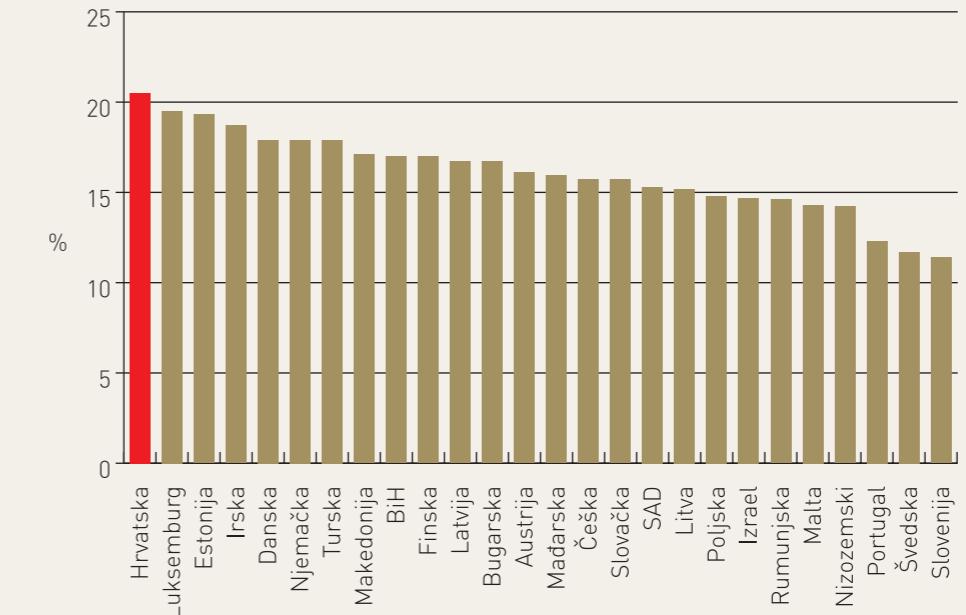
Ukupna imovina banaka /
Total assets of all banks



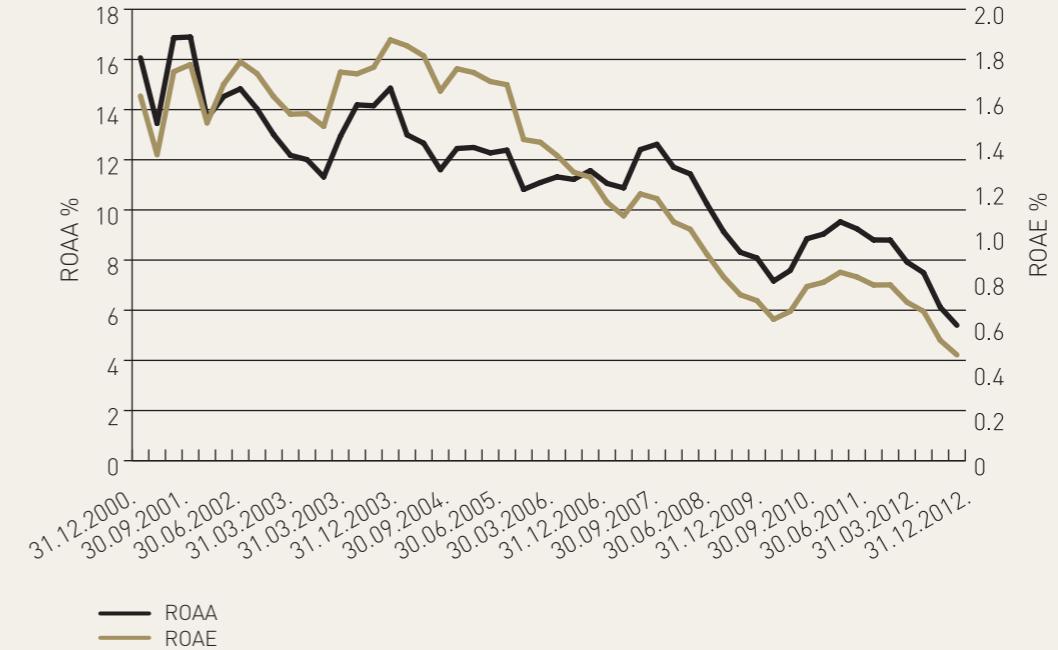
Indeks koncentracije /
Concentration index



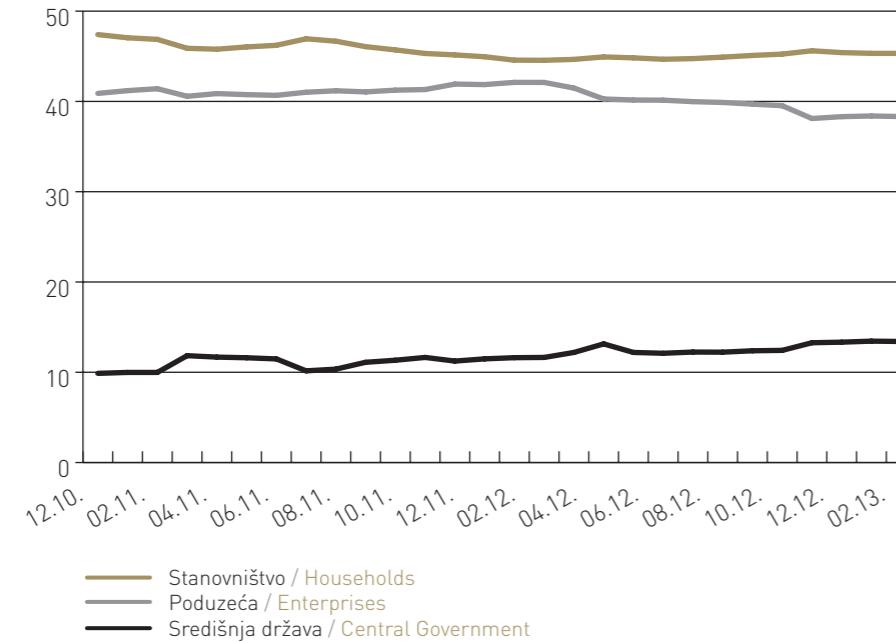
Stopa adekvatnosti kapitala - međunarodna usporedba / Capital Adequacy Ratio



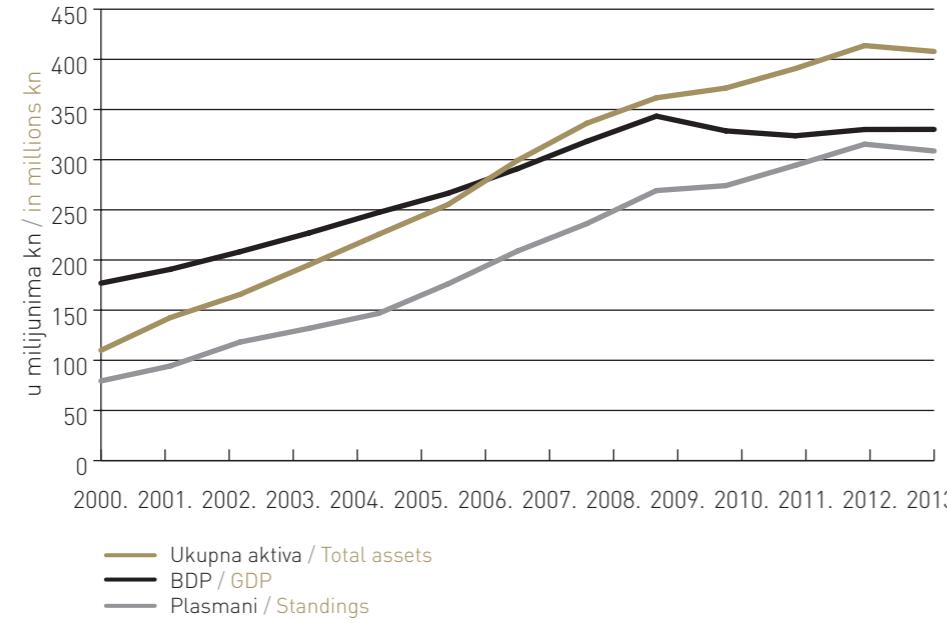
Povrat na prosječnu aktivu (ROAA) i prosječni kapital (ROAE) /
Return on assets and return on equity



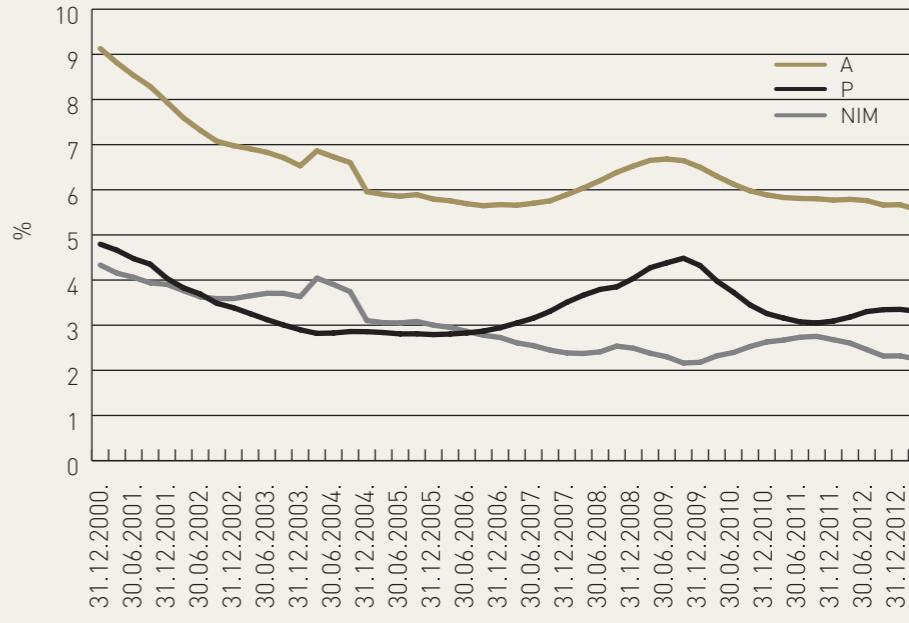
Krediti sektoru
kao % BDP-a /
Loans to the
sector as % of
GDP



Krediti, aktiva i
BDP (iznosi) /
Loans, assets
and GDP
(amounts)

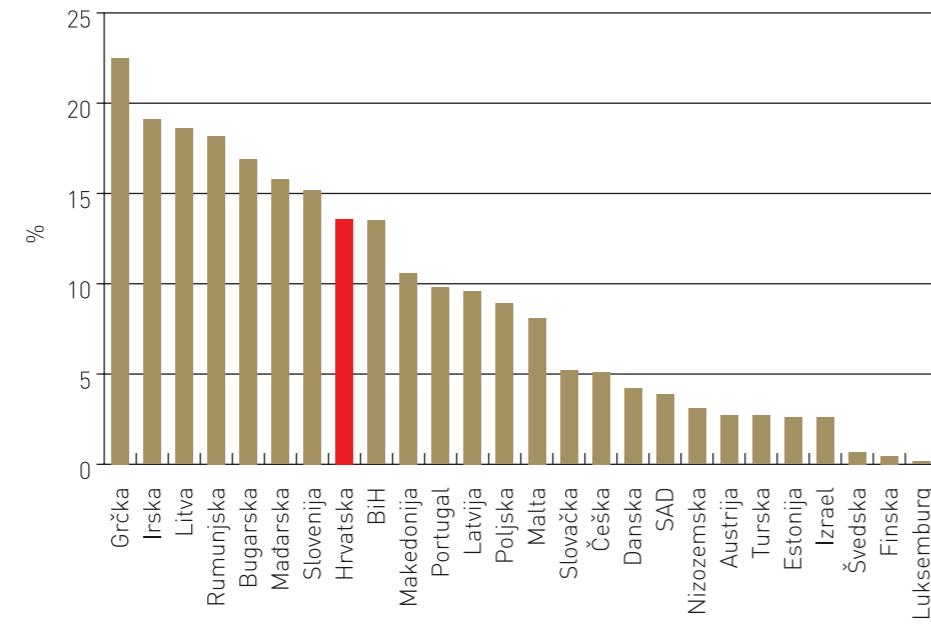


Godišnji
rast kredita
stanovništvu i
poduzećima /
Domestic credit
growth (y-o-y)
rates of credits to
households and
enterprises

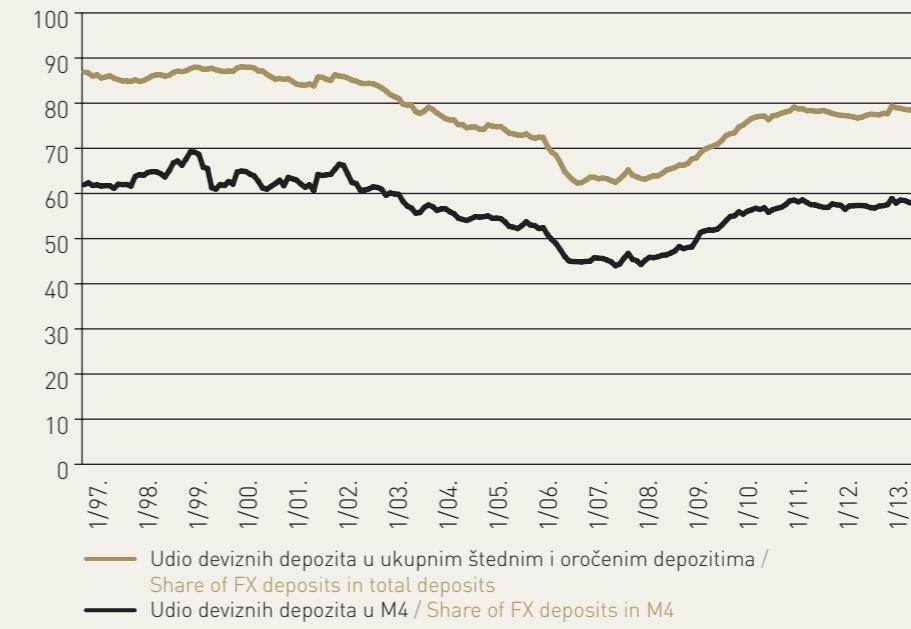
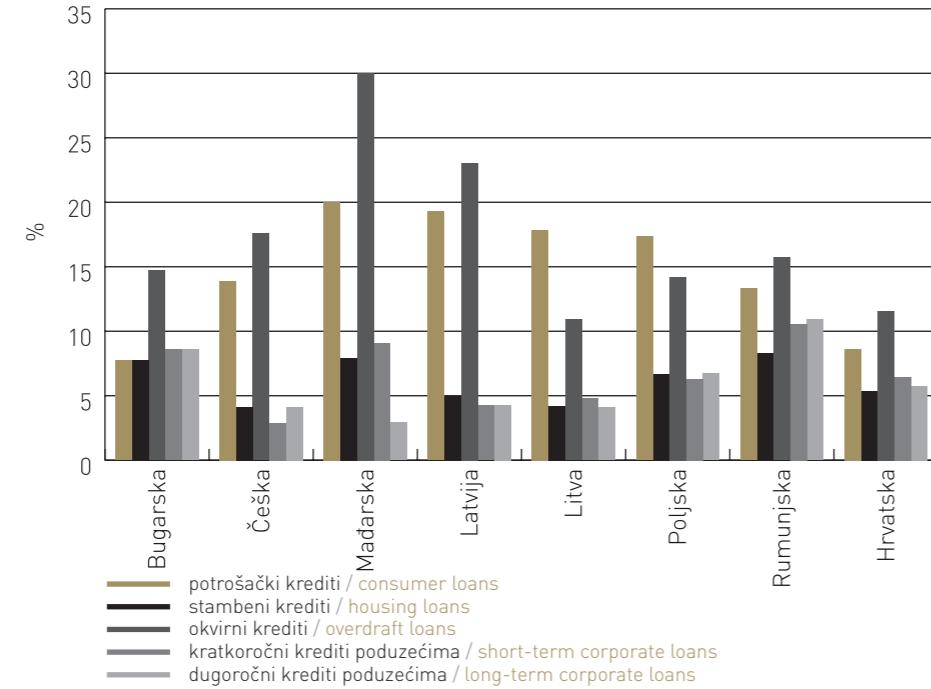


Neto kamatna
marža (NIM) /
Net interest
margin

Omjer loših kredita:
međunarodna usporedba /
Non-performing loans (%)



Kamatne stope na kredite usporednih zemalja /
International comparison of Interest rates (non eurozone countries)



Euroizacija /
Euroisation in the banking system

Nominalni dnevni tečaj kune prema euru, američkom dolaru i švicarskome franku /
Daily nominal exchange rates HRK vs. EUR, USD and CHF

Banke članice hrvatske udruge banka

Member Banks of the Croatian Banking Association

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10000 Zagreb, Petrovaradinska 1
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Telefaks: +385 1/ 4653-799
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Info telefon: 062/ 27 27 27
Internet: www.bpc.hr
E-mail: info@bpc.hr

BANKA KOVANICA d.d.
42000 Varaždin, Petra Preradovića 29
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Telefaks: +385 42/ 403-443
SWIFT: SK0VHR22
Internet: www.kovanica.hr
E-mail: kovanica@kovanica.hr

CENTAR BANKA d.d.
10000 Zagreb, Amruševa 6
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
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Telefaks: +385 62/ 37 6000
SWIFT: ESBCHR22
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Internet: www.erstebank.hr
E-mail: erstesbank@erstebank.hr

HRVATSKA POŠTANSKA BANKA d.d.
10000 Zagreb, Jurušićeva 4
Telefon: 062/ 472 472
Telefax: +385 1/ 4810 773
SWIFT: HPBZHR2X
Info telefon: 0800 472 472
Internet: www.hpb.hr
E-mail: hpb@hpb.hr

HYP ALPE-ADRIA-BANK d.d.
10000 Zagreb, Slavonska avenija 6
Telefon: +385 1/ 6030-000
Call Centre: 0800 14 14
Telefaks: +385 1/ 6007-000
SWIFT: HAABHR22
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E-mail: bank@hypo.hr

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52470 Umag, Ernesta Miloša 1
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Telefaks: +385 52/ 702 388
SWIFT: ISKBHR2X
Internet: www.ikb.hr
E-mail: callcentar@ikb.hr

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47000 Karlovac, I.G. Kovačića 1
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SWIFT: KALCHR2X
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E-mail: info@kaba.hr

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10000 Zagreb, Gundulićeva 1
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E-mail: kentbank@kentbank.hr

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SWIFT: KREZHR2X
Internet: www.kbz.hr
E-mail: kbz-uprava@kbz.hr

OTP BANKA d.d.
23000 Zadar, Domovinskog rata 3
Telefon: +385 62/ 201 600
Telefaks: +385 62/ 201 950
SWIFT: OTPVHR2X
Info telefon: +385 62/ 201 555
Internet: www.otpbanka.hr
E-mail: info@otpbanka.hr

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10000 Zagreb, Vončinina 2
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Telefaks: +385 1/ 4602-289
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Internet: www.paba.hr
E-mail: partner@paba.hr

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E-mail: info@poba.hr

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10000 Zagreb, Radnička cesta 50
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Telefaks: +385 1/ 6360-063
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Internet: www.pbz.hr
E-mail: pbz365@pbz.hr

RAIFFEISENBANK AUSTRIA d.d.
10000 Zagreb, Petrinjska 59
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Telefaks: +385 1/ 4811-624
SWIFT: RZBHHR2X
Info telefon: +385 62/ 62 62 62
Internet: www.rba.hr
E-mail: info@rba.hr

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10000 Zagreb, Varšavska 9
Telefon: +385 1/ 6393-417
Telefaks: +385 1/ 4801-365
SWIFT: VBCRHR22
Info telefon: 0800 0600
Internet: www.sberbank.hr
E-mail: info@sberbank.hr

SOCIETE GENERALE SPLITSKA BANKA d.d.
21000 Split, Ruđera Boškovića 16
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Telefaks: +385 21/ 304 034
SWIFT: SOGEHR22
Info telefon: 0800 21 00 21
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E-mail: info@splitskabanka.hr

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10000 Zagreb, Draškovićeva 58
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SWIFT: CCBZHR2X
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E-mail: info@venetobanka.hr

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10000 Zagreb, Trg bana Josipa Jelačića 10
Telefon: +385 1/ 3773-333
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dizajn / Lana Lovrić, K&K Promocija

tisak / Printera Grupa

naklada / 400

Zagreb, 2013.

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