LIFE IS FOR SHARING.



Makedonski Telekom AD - Skopje

Financial Statements For the year ended 31 December 2021 With the Report of the Auditor Thereon

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Independent auditor's report

To the Board of Directors and Shareholders of Makedonski Telekom AD Skopje

Report on the financial statements

We have audited the accompanying financial statements of Makedonski Telekom AD Skopje, which comprise the statement of financial position as of 31 December 2021 and the statement of comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, and a summary of significant accounting policies and other explanatory information.

Management's responsibility for the financial statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with International Financial Reporting Standards and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with Standards on auditing applicable in the Republic of North Macedonia (the "Standards"). The Standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control.

An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

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Opinion

In our opinion, the financial statements present fairly, in all material respects, the financial position of Makedonski Telekom AD Skopje as of 31 December 2021, and of its financial performance and its cash flows for the year than ended in accordance with International Financial Reporting Standards.

Dragan Davitkov General Manager



Aleksandra Kuzmanovska Certified Auditor

PricewaterhouseCoopers REVIZIJA DOO Skopje

21 February 2022 Skopje, Republic of North Macedonia

Makedonski Telekom AD – Skopje Financial Statements

Statement of financial position

			As at 31 December
n thousands of denars	Note	2021	2020
Assets			
Current assets			
Cash and cash equivalents	5	1,291,406	1,635,743
Deposits with banks	6	677,897	494,112
Frade receivables and other assets	7	3,115,272	3,177,433
ncome tax receivable		-	16,499
Other taxes receivable	8	930	930
nventories	9	497,731	352,195
Fotal current assets		5,583,236	5,676,912
Von-current assets			
Property, plant and equipment	11	10,360,926	10,645,972
Right of use assets	10	446,271	380,717
Advances for property, plant and equipment		4,265	6,284
ntangible assets	12	2,793,678	2,638,469
Advances for intangible assets			349
Frade receivables and other assets	7	479,615	505,217
inancial assets at fair value through profit and loss	28.1	214,920	140,881
Other non-current assets	_	612	612
Fotal non-current assets	12	14,300,287	14,318,501
Fotal assets	_	19,883,523	19,995,413
iabilities			
Current liabilities			
Frade payables and other liabilities	13	2,891,671	3,339,050
_ease Liabilities	14	125,308	110,620
ncome tax payable		10,856	-
Other taxes payable	8	28,713	45,743
Provision for liabilities and charges	16	66,064	18,582
Total current liabilities		3,122,612	3,513,995
Non-current liabilities			
Other liabilities	13	460,607	416,982
_ease liabilities	14	317,212	268,031
Deferred income tax liabilities	15	57,652	90,377
Provision for liabilities and charges	16	64,281	54,264
Γotal non-current liabilities		899,752	829,654
liabilities		4,022,364	4,343,649
Equity			
Share capital		9,583,888	9,583,888
Share premium		540,659	540,659
Treasury shares		(3,738,358)	(3,738,358)
Other reserves		958,389	958,389
Retained earnings		8,516,581	8,307,186
Γotal equity	17	15,861,159	15,651,764
Total equity and liabilities		19,883,523	19,995,413

These financial statements were authorized for issue on 21 February 2022 by the Management of Makedonski Telekom AD - Skopje, and are subject to review and approval by the Board of Directors on 25 February 2022 and by the shareholders on date that will be subsequently agreed.

C Nikola Ljushev Chief Executive Officer

Slavko Projkoski Chief Financial Officer

Goran Tilovski Controlling, Accounting and Tax Director Certified Accountant Reg. No. 0105436

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Statement of comprehensive income

		Year ended 31 Decembe			
In thousands of denars	Note	2021	2020		
Revenues	18	11,274,079	11,140,405		
Depreciation and amortization	10,11,12	(3,039,322)	(2,844,903)		
Personnel expenses	19	(1,021,192)	(1,047,510)		
Payments to other network operators		(1,062,732)	(946,311)		
Expected credit losses on trade receivables and other assets	7	(187,413)	(170,953)		
Other operating expenses	20	(4,255,959)	(4,549,852)		
Operating expenses		(9,566,618)	(9,559,529)		
Other operating income	21	23,687	39,569		
Operating profit		1,731,148	1,620,445		
Finance expenses	22	(57,849)	(62,041)		
Finance income	23	90,297	223,045		
Finance income - net		32,448	161,004		
Profit before income tax		1,763,596	1,781,449		
Income tax expense	24	(172,303)	(178,278)		
Profit for the year		1,591,293	1,603,171		
Total comprehensive income for the year		1,591,293	1,603,171		
Earnings per share (EPS) information: Basic and diluted earnings per share (in denars)	32	18.45	18.59		

Statement of cash flows

		Year er	ded 31 December
In thousands of denars	Note	2021	2020
Operating activities			
Profit before tax		1,763,596	1,781,449
Adjustments for:			
Depreciation and amortization	10,11,12	3,039,322	2,844,903
Write down/(release) of inventories to net realizable value	20	3,741	(15,525)
Fair value gain on financial assets	23	(74,040)	(9,295)
Expected credit losses on trade receivables and other assets	20	187,413	170,953
Net increase/(release) of provisions	16	71,808	(137,303)
Net gain on disposal of property, plant and equipment	21	(3,521)	(6,332)
Dividend income	23	(9,833)	(9,015)
Interest expense	22	57,849	62,041
Interest income	23	(3,430)	(179,586)
Other non-cash items		(87,512)	(68,369)
Cash generated from operations before changes in working			· · ·
capital		4,945,393	4,433,921
(Increase)/decrease in inventories		(149,277)	48,637
Increase in trade receivables and other assets		(16,563)	(247,487)
(Decrease)/increase in trade payables and other liabilities		(757,233)	122,495
Cash generated from operations		4,022,320	4,357,566
Interest paid	13,14	(48,606)	(52,262)
Provisions paid	16	(14,309)	(11,221)
Taxes paid		(177,674)	(256,313)
Cash flows generated from operating activities		3,781,731	4,037,770
Investing activities			
Acquisition of property, plant and equipment		(1,197,328)	(890,717)
Acquisition of intangible assets		(766,929)	(629,917)
Loans collected		3,877	8,238
Deposits collected from banks		494,112	0,200
Deposits placed with banks		(677,897)	(494,112)
Dividends received		9,833	9,015
Proceeds from sale of property, plant and equipment		10,684	28,439
Interest received		3,430	2,612
Cash flows used in investing activities		(2,120,218)	(1,966,442)
Financing activities			
Dividends paid	25	(1,381,361)	(1,327,766)
Payments for leases (principal)	14	(1,301,301) (128,874)	(1,327,700) (124,708)
Payments for TV content liabilities	13		(124,708) (525,562)
Cash flows used in financing activities	10	(496,163)	
Cash hows used in financing activities		(2,006,398)	(1,978,036)
Net (decrease)/increase in cash and cash equivalents		(344,885)	93,292
Cash and cash equivalents at 1 January		1,635,743	1,539,722
Effect of foreign exchange rate changes on cash and cash equivalents		548	2,729
Cash and cash equivalents at 31 December	5	1,291,406	
כעשו מות כמשו בקטוימוכוונש מנשר שכנכווושכו	5	1,291,400	1,635,743

Statement of changes in equity

In thousands of denars	Note	Share capital Sh	are premium	Treasury shares	Other reserves	Retained earnings	Total
Balance at 1 January 2020		9,583,888	540,659	(3,738,358)	958,389	8,032,402	15,376,980
Total comprehensive income for the year Transaction with		-	-	-	-	1,603,171	1,603,171
owners in their capacity of owners							
(dividends paid)		-	-	-	-	(1,328,387)	(1,328,387)
Balance at 31							
December 2020	_17	9,583,888	540,659	(3,738,358)	958,389	8,307,186	15,651,764
Balance at 1 January							
2021		9,583,888	540,659	(3,738,358)	958,389	8,307,186	15,651,764
Total comprehensive income for the year		-	-	-	-	1,591,293	1,591,293
Transaction with owners in their capacity of owners						.,,	.,,
(dividends paid)		-	-	-	-	(1,381,898)	(1,381,898)
Balance at 31							
December 2021	17	9,583,888	540,659	(3,738,358)	958,389	8,516,581	15,861,159

1. GENERAL INFORMATION

1.1. About the Company

These financial statements relate to the Company Makedonski Telekom AD - Skopje.

Makedonski Telekom AD – Skopje, (hereinafter referred as: "the Company") is a joint stock company incorporated and domiciled in the Republic of North Macedonia.

The Company's immediate parent company is AD Stonebridge Communications – Skopje, solely owned by Magyar Telekom Plc. registered in Hungary. The ultimate parent company is Deutsche Telekom AG registered in the Federal Republic of Germany.

The Macedonian telecommunications sector is regulated by the Electronic Communications Law (ECL) enacted in March 2014 (Official Gazette No. 39 dated 28 February 2014) as primary legislation and rulebooks as secondary legislation.

As of June 2013, the Company is listed on the Macedonian Stock Exchange (MSE) in the mandatory listing segment and it is reporting to MSE, pursuant to the modifications of the Law on Securities dated 2013. In accordance with the MSE listing rules the Company has permanent disclosure obligations related to the business and capital, significant changes in the financial position, the dividend calendar, changes of the free float ratio – (shares of a company that can be publicly traded and are not restricted, if it fails below 1%) and changes of the major shareholdings above 5%. In addition, the Company has specific disclosure obligations comprising of various financial information, including different financial reports (quarterly, semi-annual and annual), as well as public announcement for convening Shareholders' Assembly (SA), all modifications and amendments made to the SA agenda and publication of certain adopted SA resolutions. Before June 2013, the Company was reporting to the Macedonian Securities and Exchange Commission as a Joint Stock Company with special reporting obligations.

The Company's registered address is "Kej 13 Noemvri" No 6, 1000, Skopje, Republic of North Macedonia. The average number of employees of the Company based on the working hours during 2021 was 911 (2020: 951).

1.2. COVID-19 impact on the business and on the financial statements

In 2020, the coronavirus spread globally, and its negative impact continues to affect entities across the world. In the course of 2021 some recovery has been already visible which has resulted in local easement of the restrictive measures as well as increased mobility of the people across the borders. The management closely monitors the impact of the pandemic on the operations and provides further updates to the stakeholders as the situation evolves. Furthermore, the management is in close communication with the local state institutions and remains compliant with official guidelines.

The Company responded to the COVID-19 situation swiftly. The Company continues to meet the increased demand for connectivity through its network and has not identified any events which could jeopardize the going concern of its operation, furthermore based on the management's assessment of the future cash flows no underperformance is expected for the long term.

Management paid particular attention to the solvency of customers due to COVID-19 however, based on experiences of last months and expectations considering the future COVID effects, no material effects on bad debt rate.

During 2021, the inflation rates has increased globally, resulting in a local inflation rate of 3.2% for 2021 (2020: 1.2%). However, based on the inflation forecasts of the National Bank of North Macedonia for 2022, it is expected to slowly decrease to the level of 2.4%. The global rise of energy cost will result in significant increase of the company's energy costs; however, the Management believes that such negative trend may be compensated as much as possible with a set of measures and better commercial results.

2. SIGNIFICANT ACCOUNTING POLICIES

The principal accounting policies adopted in the preparation of these financial statements are set out below. These policies have been consistently applied to all the years presented, unless otherwise stated.

2.1. Basis of preparation

The financial statements of Makedonski Telekom AD – Skopje have been prepared in accordance with International Financial Reporting Standards (IFRS).

The financial statements are presented in Macedonian denars rounded to the nearest thousand.

The preparation of financial statements in conformity with IFRS requires the use of certain critical accounting estimates. It also requires management to exercise its judgment in the process of applying the Company's accounting policies. The areas involving a higher degree of judgment or complexity, or areas where assumptions and estimates are significant to the financial statements are disclosed in note 4. Actual results may differ from those estimated.

2.1.1. Standards amended and the subject of the amendments effective on or after 1 January 2021 that are relevant to the Company accounting policies

Title of standard	Nature of change	Expected Impact on financial statements	Application date
Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16	Interest Rate Benchmark Reform – Phase 2; The amendments address the impact of modifications of financial instruments required as a direct consequence of the IBOR reform, hedge accounting requirements, and the accompanying disclosures.	The amendment of the standard has no impact in the financial statements of the Company, based on internal assessment	1 January 2021
Amendments to IFRS 16	Covid-19- Related Rent Concessions beyond June 30, 2021. Extension of practical expedient until June 30, 2022 for lessee accounting of rent concessions granted due to the Covid-19 pandemic.	The Company does not apply this practical expedient of IFRS 16.	1 April 2021*

*Earlier application is permissible. The Company already decided in the 2020 financial year not to apply the practical expedient.

2.1.2. Standards, amendments and interpretations that are not yet effective as of 31 December 2021 and have not been early adopted by the Company and other expected changes for 2022 and 2023

Title	Key requirements	Impact on the financial statments	Effetive date
Amendments	Business Combinations; Property, Plant	No material impact is expected in the	1 January 2022
to IFRS 3; IAS	and Equipment; Provisions; Contingent	financial statements of the Company.	
16; IAS 37 and	Liabilities and Contingent Assets;		
Annual	Package of narrow-scope amendments		
Improvements	to three Standards as well as the Board's		
2018-2020	Annual Improvements, which are		
	changes that clarify the wording or		
	correct minor consequences, oversights		
	or conflicts between requirements in the		
	Standards.		

IFRS 17 and Amendments to IFRS 17	Insurance Contracts; IFRS 17 governs the accounting for insurance contracts and replaces IFRS 4. Deferral of first-time application of IFRS 17 to January 1, 2023. The amendments refer to specific topics helping entities to implement the standard and avoiding a significant loss of useful information.	No material impact is expected in the financial statements of the Company	1 January 2023
Standards not	vet endorsed by the EU*	I	
Amendments to IAS 1	Presentation of Financial Statements; Classification of Liabilities as Current or Non-current and Deferral of Effective Date.	No material impact is expected in the financial statements of the Company	1 January 2023
Amendments to IAS 1	Presentation of Financial Statements; Disclosure of material accounting policy information instead of significant accounting policies. In addition, IFRS Practice Statement 2 has been amended.	No material impact is expected in the financial statements of the Company	1 January 2023
Amendments to IAS 8	Accounting policies, Changes in Accounting Estimates and Errors; Introduced a definition of 'accounting estimates' and included other amendments to help entities distinguish changes in accounting policies from changes in accounting estimates.	No material impact is expected in the financial statements of the Company	1 January 2023
Amendments to IAS 12	Income Taxes; Deferred Tax related to Assets and Liabilities arising from a Single Transaction	No material impact is expected in the financial statements of the Company	1 January 2023
Amendments to IFRS 17	Insurance contracts; Initial Application of IFRS 17 and IFRS 9 – Comparative Information; Transition option relating to comparative information about financial assets presented on initial application of IFRS 17, helping entities to avoid temporary accounting mismatches between financial assets and insurance contract liabilities, and therefore improve the usefulness of comparative information for users of financial statements.	No material impact is expected in the financial statements of the Company	1 January 2023

* For standards not yet endorsed by the EU, the date of first-time adoption scheduled by the IASB is assumed for the time being as the likely date of first-time adoption.

2.2. Foreign currency translation

2.2.1. Functional and presentation currency

The financial statements are presented in thousands of Macedonian denars, which is the Company's functional and presentation currency.

2.2.2. Transactions and balances

Transactions in foreign currencies are translated to denars at the foreign exchange rate ruling at the date of the transaction. Monetary assets and liabilities denominated in foreign currencies at the financial statement date are translated to denars at the foreign exchange rate ruling at that date. Foreign exchange differences arising on translation are recognized in the profit or loss (Finance income/expenses). Non-monetary financial assets and liabilities denominated in foreign currency are translated to denars at the foreign exchange rate ruling at the date of transaction.

The foreign currencies deals of the Company are predominantly Euro (EUR) and United States Dollars (USD) based.

The exchange rates used for translation at 31 December were as follows:

	2021	2020
	MKD	MKD
1 USD	54.37	50.24
1 EUR	61.63	61.69

2.3. Financial instruments

A financial instrument is any contract that gives rise to a financial asset of one entity and a financial liability or equity instrument of another entity.

Financial assets of the Company include, cash and cash equivalents, deposits with banks, equity instruments of another entity (financial instruments at fair value through profit or loss) and contractual rights to receive cash (trade and other receivables) or another financial asset from another entity.

Financial liabilities of the Company include liabilities that originate from contractual obligations to deliver cash or another financial asset to another entity (non-derivatives). In particular, financial liabilities include trade and other payables.

The fair value of traded financial instruments is determined by reference to their market prices at the end of the reporting period. This typically applies to financial assets at fair value through profit or loss.

The fair value of other financial instruments that are not traded in an active market is determined by using discounted cash flow valuation technique. The expected cash inflows or outflows are discounted by market-based interest rates.

The fair value of long-term financial liabilities is also determined by using discounted cash flow valuation technique. The expected cash inflows or outflows are discounted by market-based interest rates.

Assumptions applied in the fair value calculations are subject to uncertainties. Changes in the assumptions applied in the calculations would have an impact on the carrying amounts, the fair values and/or the cash flows originating from the financial instruments. Sensitivity analyses related to the Company's financial instruments are provided in Note 3.

2.3.1. Financial assets

The Company classifies its financial assets on the basis of both:

- the entity's business model for managing the financial assets and
- the contractual cash flow characteristics of the financial asset

in the following categories:

- at amortized cost if both of the following conditions are met:
 - the financial asset is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows and

- the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.
- at fair value through other comprehensive income (FVOCI) if both of the following conditions are met:
 - the financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and
 - the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.
- at fair value through profit or loss (FVTPL) unless it is classified in the previous categories.

For the purpose of the above classification:

- principal is the fair value of the financial asset at initial recognition
- interest consists of consideration for the time value of money, for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs, as well as a profit margin.

Standard purchases and sales of financial assets are recognized on the trade-date, the date on which the Company commits to purchase or sell the asset. Investments are initially recognized at fair value plus transaction costs for all financial assets not carried at fair value through profit or loss. Financial assets carried at fair value through profit or loss are initially recognized at fair value, and transaction costs are expensed in the profit or loss.

Financial assets are derecognized when the rights to receive cash flows from the investments have expired or have been transferred. Financial assets have been transferred when the contractual rights to receive cash flows of the financial assets have been transferred or the contractual rights to receive cash flows of the financial assets have been retained but there is a contractual obligation to pay the cash flows to one or more recipients in an arrangement compliant with the conditions set out by IFRS 9. Any gains or losses on derecognition are recognized in the profit or loss and they are calculated as the difference between (a) the sum of the consideration received and any cumulative gain or loss that had been recognized in other comprehensive income and (b) the carrying amount derecognized.

- Impairment of financial assets

Depending on the business model of the Company and the characteristics of the contractual cash flows of the financial assets, financial assets are subsequently measured at amortized cost, at fair value through other comprehensive income or at fair value through profit or loss.

A loss allowance must be recognized for financial assets measured at amortized cost and at fair value through other comprehensive income. The loss allowance must be recognized through profit or loss and reduces the carrying amount of the relevant financial asset; in the case of financial assets measured at fair value through other comprehensive income, the corresponding offsetting entry is recognized in other comprehensive income and does not reduce the carrying amount of the financial asset.

Loss allowances must also be recognized for lease receivables, contract assets as defined in IFRS 15, financial guarantee contracts and loan commitments relating to loans bearing an off-market interest rate.

Loss allowance is recognized in respect of not only losses already incurred as of the reporting date (incurred losses) but also losses which have not yet incurred as of the reporting date but which are expected to be incurred in the future (expected losses).

Based on the changes in credit risk, it must be assessed at each reporting date whether the current loss allowance must be measured at an amount equal to the lifetime expected credit losses or at an amount equal to the 12-month expected credit losses. If it is not possible to assess whether the credit risk has increased significantly based on the individual financial asset, it must be assessed at the portfolio level.

The simplified and the general approaches are to be applied to assess and account for credit losses.

- Simplified approach

All financial instruments underlying the simplified approach are measured with lifetime expected credit loss. Therefore, except for insolvency, neither any indicators for increase in credit risk nor any default events are relevant within simplified approach.

The simplified approach is applicable for trade receivables, contract assets and lease receivables.

- General approach

According to the expected credit loss model the financial instruments are classified into three buckets. The classification into the three buckets is based upon the changes of the credit risk for the financial asset. A relative credit risk model is used for the evaluation of an increased credit risk. The increase of credit risk in comparison to the initial recognition is reflected in the transfer of the financial instrument between the buckets.

According to the expected credit risk model the impairment is determined differently for the three buckets. The impairment for financial instruments in bucket 1 is calculated based upon the 12 months expected credit loss. The impairment for financial instruments in bucket 2 and 3 is calculated based upon the lifetime expected credit losses. Once a long-term asset has moved to bucket 3 effective interest method has to be applied to reach net value after impairment.

The general approach is applied for bank accounts.

The Company classifies its financial assets in the following categories:

- (a) Financial assets measured at amortized cost
- (b) Financial assets at fair value through profit or loss (FVTPL)

(a) Financial assets measured at amortized cost

The following items are assigned to category financial assets measured at amortized cost:

- cash and cash equivalents;
- deposits over 3 months;
- trade receivables;
- employee loans;
- other receivables.

Financial assets at amortized cost are initially recognized at fair value and subsequently carried at amortized cost using the effective interest method (relevant only for the receivables with long-term maturity).

Cash and cash equivalents

Cash and cash equivalents include cash on hand, cash in bank, call deposits held with banks and other short-term highly liquid investments with original maturities of three months or less.

Bank deposits over 3 months

Bank deposits with original maturities over 3 months include bank deposits and other liquid deposits and securities with original maturities over three months.

Trade and other receivables

If there is objective evidence that an impairment loss on trade receivables carried at amortized cost has been incurred, the amount of the loss is measured as the difference between the asset's carrying amount and the present value of estimated future cash flows discounted at the receivable's original effective interest rate (i.e. the effective interest rate computed at initial recognition). In case of short-term trade receivables estimation is made on the amount of expected future cash inflows and compared to the carrying amount, the difference is accounted for as allowance for trade receivables. The carrying amount of the asset is reduced through use of an allowance account. The amount of the loss is recognized in the profit or loss (Other operating expenses – Impairment losses on trade and other assets).

If, in a subsequent period, the amount of the impairment loss decreases and the decrease can be related objectively to an event occurring after the impairment was recognized (such as an improvement in the debtor's credit rating), the previously recognized impairment loss shall be reversed by adjusting an allowance account. The reversal shall not result in a carrying amount of the financial asset that exceeds what the amortized cost would have been had the impairment not been recognized at the date the impairment is reversed. The amount of the reversal shall be recognized in the profit or loss as a reduction to Other operating expenses (Impairment losses on trade and other assets).

Amounts due to, and receivable from, other network operators are shown net where a right of set-off exists and the amounts are settled on a net basis (such as receivables and payables related to international traffic).

Impairment of trade receivables is assessed on two levels. Trade receivables that are individually significant and the ones that are not individually significant are separated. In case of individually significant items it is assessed individually whether objective evidence of impairment exists.

When it is determined that no objective evidence of impairment exists for an individually assessed accounts receivable, whether significant or not, the item should be included in a group of accounts receivables with similar credit risk characteristics and assessed collectively for impairment. Receivables that are individually assessed for impairment and for which an impairment loss is or continues to be recognized are not included in a collective assessment of impairment.

There are two categories of calculating impairment loss for trade receivables:

- for invoices which are overdue
- for invoices which are not yet due ('zero-day impairment calculation')

In case of collective assessment objective evidence of impairment exists if there are overdue items in a group of receivables. An ageing list is prepared on overdue receivables and the amount of impairment is calculated by multiplying impairment rates based on historical loss experience with the amount of receivables.

Impairment rates are calculated based on historical loss experience, however it is adjusted on the basis of current observable data to reflect the effects of current conditions that did not affect the period on which the historical loss experience is based and to remove the effects of conditions in the historical period that do not exist currently. During the impairment calculation forward looking information is also considered. Such kind of information are change in debt to financial system and non-residents / GDP and Household debt-service and principal payments / disposable income.

When a trade receivable is established to be uncollectible, it is written off against the allowance for Trade and other assets. Subsequent recoveries of amounts previously written off are credited against the period's Other operating expenses.

Employee loans

Employee loans are recognized initially at fair value and subsequently measured at amortized cost using the effective interest method.

Difference between the nominal value of the loan granted and the initial fair value of the employee loan is recognized as prepaid employee benefits, which reduces Loans and receivables from employees. Interest income on the loan granted calculated by using the effective interest method is recognized as finance income, while the prepaid employee benefits are amortized to Personnel expenses evenly over the term of the loan. The program is not active in terms of granted new loans. The Company stopped providing employee loans in 2013.

Impairment losses on Employee loans, if any, are recognized in the profit or loss (Expected credit loss on trade receivables and other assets).

(b) Financial assets at fair value through profit or loss

The "financial assets at fair value through profit or loss" measurement category includes equity instruments. A financial asset is classified in this category if the Company manages such asset and makes purchase and sale decisions based on its fair value in accordance with the Company investment strategy for keeping investments within portfolio until there are favorable market conditions for their sale.

Financial assets at fair value through profit or loss' are subsequently carried at fair value. Gains or losses arising from changes in the fair value of the 'financial assets at fair value through profit or loss' category are recognized in the profit or loss (Finance income/expense) in the period in which they arise.

Dividend income from financial assets at fair value through profit or loss is recognized in the profit or loss when the Company's right to receive payments is established and inflow of economic benefits is probable.

2.3.2. Financial liabilities

Trade and other payables

Trade and other payables (including accruals) are recognized initially at fair value and subsequently measured at amortized cost using the effective interest method. The carrying values of trade and other payables approximate their fair values due to their short maturity.

Long term financial liabilities are recognized initially at fair value and subsequently measured at amortized cost using the effective interest method.

2.4. Inventories

Inventories are stated at the lower of cost or net realizable value. Net realizable value is the estimated selling price in the ordinary course of business, less the estimated selling expenses.

The cost of inventories is based on weighted average cost formula and includes expenditure incurred in acquiring the inventories and bringing them to their existing location and condition.

Phone sets are often sold for less than cost in connection with promotions to obtain new contracts with minimum commitment periods, as part of profitable service agreement. If the normal resale value is lower than costs, the difference is recognized as impairment immediately.

Impairment losses on Inventories are recognized in Other operating expenses (Write down of inventories to net realizable value).

2.5. Assets held for sale

An asset is classified as held for sale if it is no longer needed for the future operations of the Company, and has been identified for sale, which is highly probable and expected to take place within 12 months. These assets are accounted for at the lower of carrying value or fair value less cost to sell. Depreciation is discontinued from the date of designation to the held for sale status. When an asset is designated for sale, and the fair value is determined to be lower than the carrying amount, the difference is recognized in the profit or loss (Depreciation and amortization) as an impairment loss.

2.6. Property, plant and equipment (PPE)

Property, plant and equipment are stated at cost less accumulated depreciation and impairment losses (see note 2.8).

The cost of an item of PPE comprises its purchase price, including import duties and non-refundable purchase taxes, after deducting trade discounts and rebates, any costs directly attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management. The initial estimate of the costs of dismantling and removing the item and restoring the site on which it is located is also included in the costs if the obligation incurred can be recognized as a provision according to IAS 37 – Provisions, Contingent Liabilities and Contingent Assets.

The cost of self-constructed assets includes the cost of materials and direct labor.

In 2011, Law on acting with illegally built facilities was enacted, according to which the Company will incur certain expenditures related to obtaining complete documentation for base stations and fix line infrastructure in accordance to applicable laws in Republic of North Macedonia. The Company capitalizes those expenditures as incurred. The capitalized expenditures are included within Property, plant and equipment (see note 11).

Subsequent costs are included in the asset's carrying amount or recognized as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the Company and the cost of the item can be measured reliably. The carrying amount of the replaced part is derecognized. All other repairs and maintenance are charged to the profit or loss during the financial period in which they are incurred.

When assets are scrapped, the cost and accumulated depreciation are removed from the accounts and the loss is recognized in the profit or loss as depreciation expense.

When assets are sold, the cost and accumulated depreciation are removed from the accounts and any related gain or loss, determined by comparing proceeds with carrying amount, is recognized in the profit or loss (Other operating income/expense).

Depreciation is charged to the profit or loss on a straight-line basis over the estimated useful lives of items of property, plant and equipment. Assets are not depreciated until they are available for use. Land is not depreciated. The assets useful lives and residual values are reviewed, and adjusted if appropriate, at least once a year. For further details on the groups of assets impacted by the most recent useful life revisions (see note 11).

The estimated useful lives are as follows:

	2021	2020
	Years	Years
Buildings	20-40	20-40
Aerial and cable lines	20-25	20-25
Telephone exchanges	7-10	7-10
Base stations	10	10
Computers	4	4
Furniture and fittings	4-10	4-10
Vehicles	5-10	5-10
Other	2-15	2-15

2.7. Intangible assets

Intangible assets that are acquired by the Company are stated at cost less accumulated amortization and impairment losses (see note 2.8).

Subsequent expenditure on intangible assets is capitalized only when it increases the future economic benefits embodied in the specific asset to which it relates. All other expenditure is expensed as incurred. New software modules that cannot be used independently of the existing software (releases), but rather only combined with the base version's functionalities and are implementations of enhanced software, characterized by systematic updates, revisions or expansions of previous versions of existing software represent subsequent costs for the previous version and are capitalized if they meet the capitalization criteria, i.e. if they coincide with the creation of additional functionalities. Consequently, the costs of releases is capitalized as part of the base version and amortized together with the residual carrying amount over the base software's remaining useful life. If indications exist that the software will be operated longer than the current useful life as a result of subsequently capitalized expenditure, the useful life of the base software is reviewed, and if applicable extended.

The Company's primary activities are in the fixed line and mobile operations in Republic of North Macedonia. These operations usually require acquisition of licenses/frequency usage rights, which generally contain upfront fees and annual fees. For each acquired license/frequency usage right, the Company assesses whether the amount of future annual fees can be measured reliably at the start of the validity period of the license. If the Company considers that the amount of future annual fees can be measured reliably, the present value of the future annual fees is capitalized, if any, as part of the cost of the license otherwise these fees are recognized as expenses (Other operating expenses) in the period they relate to.

The useful lives of concession and licenses are determined based on the underlying agreements and are amortized on a straight-line basis over the period from availability of the frequency for commercial use until the end of the initial concession or license term. No renewal periods are considered in the determination of useful life (see note 12).

Content rights are capitalized as intangible assets if all of the following conditions are met: there is no doubt whatsoever that the content will be delivered as agreed in the contract; non-cancellable term of the contract is at least 12 months and cost can be estimated reliably. Content rights are amortized over the contracts term. The financial liability recognized for capitalized content is presented in the statement of financial position within Other financial liabilities. Unwinding of an accrued interest is recognized as an interest expense and is presented within Financial expense. Consequently, the relevant cash outflows are presented as cash flows from financing activities.

The estimated useful lives are as follows:

	2021	2020
	Years	Years
Software and licenses	2-5	2-5
Concession	18	18
3G and 2G License	10	10
4G License	7-20	20

The change in category 4G License, an addition of 7 years in 2021 is due to new license bough - 2100 MHz (2x15 MHz). License validity is until end of 2028.

Amortization is charged to the profit or loss on a straight-line basis over the estimated useful lives of intangible assets. Intangible assets are amortized from the date they are available for use. The assets useful lives are reviewed, and adjusted if appropriate, at least once a year (see note 12).

In determining whether an asset that incorporates both intangible and tangible elements should be treated under IAS 16 - Property, Plant and Equipment or as an intangible asset under IAS 38 – Intangible Assets, management uses judgment to assess which element is more significant and recognizes the assets accordingly.

2.8. Impairment of property, plant and equipment and intangible assets

Assets that have an indefinite useful life are not subject to amortization and are tested annually for impairment.

Assets that are subject to amortization or depreciation are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An impairment loss is recognized for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of the asset's fair value less costs to sell and its value in use. For the purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows (cash-generating units - CGUs).

Impairment losses are recognized in the profit or loss (Depreciation and amortization). Non-financial assets that suffered impairment are reviewed for possible reversal of the impairment at each reporting date.

2.9. Provisions and contingent liabilities

Provisions are recognized when the Company has a present legal or constructive obligation as a result of past events and it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation, and a reliable estimate of the amount of the obligation can be made.

Provisions are measured and recorded as the best estimate of the economic outflow required to settle the present obligation at the financial statement date. The estimate can be calculated as the weighted average of estimated potential outcomes or can also be the single most likely outcome. The provision charge is recognized in the profit or loss within the expense corresponding to the nature of the provision.

No provision is recognized for contingent liabilities. A contingent liability is a possible obligation that arises from past events and whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the entity; or a present obligation that arises from past events but is not recognized because it is not probable that an outflow of resources embodying economic benefits will be required to settle the obligation or the amount of the obligation cannot be measured with sufficient reliability.

2.10. Share capital

Ordinary shares are classified as equity.

2.11. Treasury shares

When the Company purchases the Company's equity share capital, the consideration paid, including any directly attributable incremental costs (net of income taxes), is deducted from equity attributable to the owners as treasury shares until the shares are cancelled or reissued. When such shares are subsequently reissued, the treasury share balance decreases by the original cost of the shares, thereby increasing equity, while any gains or losses are also recognized in equity (Retained earnings). Treasury shares transactions are recorded on the transaction date.

2.12. Other reserves

Under local statutory legislation, the Company was required to set aside minimum 15 percent of its net profit for the year in a statutory reserve until the level of the reserve reaches 1/5 of the share capital. With the changes of the Law on Trading Companies effective from 1 January 2013, the Company is required to set aside minimum 5 percent of its net profit for the year in accordance with the adopted international financial reporting standards published in the "Official Gazette of the Republic of North Macedonia" in a statutory reserve until the level of the reserve reaches 1/10 of the share capital. These reserves are used to cover losses and are not distributed to shareholders except in the case of bankruptcy of the Company.

2.13. Revenues

Revenues for all services and equipment sales (see note 18) are shown net of VAT and discounts.

The core principle of IFRS 15 is for companies to recognize revenue to depict the transfer of goods or services to customers in amounts that reflect the consideration (that is, payment) to which the company expects to be entitled in exchange for those goods or services.

Revenue should be recognized if it is probable that the Company will collect the consideration to which it will be entitled in exchange for the goods or services that will be transferred to the customer.

Revenue is recognized when or as performance obligations are satisfied by transferring control of a promised good or service to a customer. Control either transfers over time or at a point in time, which affects when revenue is recorded.

As a practical expedient, the Company applies the guidance to a group of contracts with similar characteristics instead of to a single contract with a customer. A portfolio approach is acceptable if the Company can reasonably expect that the effect of applying a portfolio approach to a group of contracts or a group of performance obligations would not differ materially from considering each contract or performance obligation separately. This implies that a portfolio of contracts with similar characteristics does not necessarily need to refer to homogenous products being included in these contracts.

Main principles

- If Company performs by transferring goods or services to a customer before the customer pays consideration or before payment is due, the Company shall present the contract as a Contract asset, excluding any amounts presented as a receivable. A contract asset is the Company's right to consideration in exchange for goods or services that the Company has transferred to a customer.
- In the case of multiple-element arrangements (e.g., mobile contract plus handset) with subsidized products delivered in advance, a larger portion of the total remuneration is attributable to the component delivered in advance (mobile handset), requiring earlier recognition of revenue. This leads to the recognition of what is known as a contract asset – a receivable arising from the customer contract that has not yet legally come into existence – in the Statement of Financial Position.
- At the same time, it resulted in higher revenue from the sale of goods and merchandise and to lower revenue from the provision of services.
- Expenses for sales commissions (customer acquisition costs) must be capitalized in the Contract costs, presented in Trade receivables and other assets line of the Statement of Financial Position and recognized over the estimated customer retention period.
- Later recognition of revenue in cases where "material rights" are granted, such as offering additional discounts for future purchases of further products.
- Contract liabilities (which, as deferred revenue, were already recognized as liabilities in the past and with the transition reclassified) are now netted off against the contract assets for each customer contract.
- For the purposes of determining whether the Company sells products for its own account (principal = gross revenue) or for the account of others (agent = net revenue), there was no material change upon the application of IFRS 15 requirements.
- A significant financing component is not considered for the amount and timing of revenue recognition if the period between when a promised good or service is transferred to the customer and when the customer pays for that good or service will be one year or less.
- If the promise to grant a license is distinct from the other promised goods or services in the contract then the promise to grant the license is a separate performance obligation and the Company shall determine whether the license transfers to a customer either at a point in time or over time.

2.13.1. Fixed line and mobile telecommunications revenues

Revenue is primarily derived from services provided to subscribers and other third parties using telecommunications network, and equipment sales.

Customer subscriber arrangements typically include an equipment sale, subscription fee and charge for the actual voice, internet, data or multimedia services used.

Airtime revenue is recognized based upon minutes of use and contracted fees less credits and adjustments for discounts, while subscription and flat rate revenues are recognized in the period they relate to.

The Company provides customers with narrow and broadband access to its fixed, mobile and TV distribution networks.

Revenues from premium rate services (voice and non-voice) are recognized on a gross basis when the delivery of the service over the network is the responsibility of the Company, the Company establishes the prices of these services and bears substantial risks of these services, otherwise presented on a net basis.

Customers may also purchase prepaid mobile, public phone and internet credits ("prepaid cards") which allow those customers to use the telecommunication network for a selected amount of time. Customers must pay for such services at the date when the card is purchased. Revenues from the sale of prepaid cards are recognized when used by the customers or when the cards expired with unused traffic.

Third parties using the telecommunications network include roaming customers of other service providers and other telecommunications providers which terminate or transit calls on the network. These wholesale (incoming) traffic revenues are recognized in the period of related usage. A proportion of the revenue received is often paid to other operators (interconnect) for the use of their networks, where applicable. The revenues and costs of these terminate or transit calls are stated gross in these financial statements as the Company is the principal supplier of these services using its own network freely defining the pricing of the service, and recognized in the period of related usage.

Contracts are frequently sold to customers containing a cross subsidy between two or more components. A typical example is where a mobile phone is sold at a price significantly below its market value in a bundle with a service contract for a period of 24 months. From a commercial point of view, the subsidy on the mobile phone is recompensated via the service fee.

With this adjustment requirement (also termed as "basic adjustment") a cross-subsidy or an overall bundle discount must be allocated to the individual components of the bundle so that revenue generally reflects the fair value of the good and/or service with a bundle discount being allocated based on relative standalone selling prices.

The revenue is determined for every component by distributing the transaction price to the individual components in proportion to their relevant standalone selling prices.

2.13.2. System integration and IT revenues

Contracts for network services consist of the installation and operation of communication networks for customers. Revenues for voice and data services are recognized under such contracts when used by the customer.

The Company transfers control of goods and services over time and, therefore, satisfies a performance obligation and recognizes revenue over time, if one of the following criteria is met:

- a customer simultaneously receives and consumes the benefit provided by Company's performance as Company performs
- Company's performance creates or enhances assets that the customer controls as the asset is created or enhanced
- Company's performance does not create an asset with an alternative use to Company and Company has an enforceable right to payment for performance completed to date.

If the performance obligation is not satisfied over time, the Company satisfies the performance obligation at a point in time.

Revenue from hardware sales or sales-type leases is recognized when the customer obtains the control over the product.

To determine the progress of performance the Company is applying the Input method. The Company recognize revenue on the basis of the Company's efforts or inputs to the satisfaction of a performance obligation (resources consumed, labor hours expended, cost incurred, time elapsed or machine hours used) relative to the total expected inputs to the satisfaction of the performance obligation.

2.14. Employee benefits

2.14.1. Short term employee benefits and pensions

The Company, in the normal course of business, makes payments on behalf of its employees for pensions, health care, employment and personnel tax which are calculated according to the statutory rates in force during the year, based on gross salaries and wages. Holiday allowances are also calculated according to the local legislation. The Company makes these contributions to the Governmental and private funds. The cost of these payments is charged to the profit or loss in the same

period as the related salary cost. No provision is created for holiday allowances for non-used holidays as according the local legislation the employer is obliged to provide condition for usage, and the employee to use the annual holiday within one year. This is also exercised as Company policy and according the historical data employees use their annual holiday within the one-year legal limit. The Company does not operate any other pension scheme or post-retirement benefits plan and consequently, has no obligation in respect of pensions. The Company has contractual obligation to pay to employees three average monthly salaries in Republic of North Macedonia at their retirement date according the Collective agreement between the Company and the Trade Union of the Company, for which appropriate liability is recognized in the financial statements measured at the present value of three average monthly salaries together with adjustments incorporated in the actuarial calculation. The defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of high-quality bonds that are denominated in the currency in which the benefits will be paid. In addition, the Company is not obligated to provide further benefits to current and former employees.

2.14.2. Bonus plans

The Company recognizes a liability and an expense for bonuses taking into consideration the financial and operational results. The Company recognizes a provision where contractually obliged or where there is a past practice that has created a constructive obligation.

2.14.3. Termination benefits

Termination benefits are payable whenever an employee's employment is terminated before the nominal retirement date or whenever an employee accepts voluntary redundancy in exchange for these benefits. The Company recognizes termination benefits when it is demonstrably committed to either terminate the employment of current employees according to a detailed formal plan without the possibility of withdrawal or to provide termination benefits as a result of an offer made to encourage voluntary redundancy.

2.15. Marketing expenses

Marketing costs are expensed as incurred. Marketing expenses are disclosed in note 20.

2.16. Taxes

2.16.1. Income tax

According to the provisions of the Income tax law, the tax base is the profit generated during the fiscal year increased for nondeductible expenses and reduced for deductible revenue (i.e. dividends already taxed at the payer) and the income tax rate is 10%. In line with these income tax for the year was calculated and recorded in the Statement of comprehensive income.

The tax authorities may at any time inspect the books and records within 5 years subsequent to the reported tax year, and may impose additional tax assessments and penalties. In a case of tax evasion or tax fraud the statute of limitations may be extended up to 10 years. The Company's management is not aware of any circumstances, which may give rise to a potential material liability in this respect other than those provided for in these financial statements.

2.16.2. Deferred income tax

Deferred tax is recognized applying the liability method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the financial statements. However, deferred tax is not accounted for if it arises from initial recognition of an asset or liability in a transaction other than a business combination that at the time of the transaction affects neither accounting nor taxable profit. Deferred tax is determined using income tax rates that have been enacted or substantially enacted by the financial statement date and are expected to apply when the related deferred tax asset is realized or the deferred tax liability is settled.

Deferred tax assets are recognized to the extent that it is probable that future taxable profit (or reversing deferred tax liabilities) will be available against which the temporary differences can be utilized.

Deferred income tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets against current tax liabilities and when the deferred income taxes assets and liabilities relate to income taxes levied by the same taxation authority on either the same taxable entity or different taxable entities where there is an intention to settle the balances on a net basis.

2.17. Leases

2.17.1. Operating leases - Company as a lessor

Under IFRS 16, an operating lease is a lease that does not transfer substantially all the risks and rewards incidental to ownership of an underlying asset. These are typically simple short-term hire arrangement (an operating lease), whereby rental payments received are dealt with in profit or loss with the primary impact on the balance sheet relating to the timing of lease payments.

Assets leased to customers under operating leases are included in Property, plant and equipment in the statement of financial position. They are depreciated over their expected useful lives on a basis consistent with similar fixed assets. Rental income is recognized on a straight-line basis over the lease term.

2.17.2. Leases - Company as a lessee

Leases are recognized as a right-of-use asset and a corresponding liability at the date at which the leased asset is available for use by the Company. Assets and liabilities arising from a lease are initially measured on a present value basis. Lease liabilities include the net present value of the lease payments. The lease payments are discounted using the interest rate implicit in the lease. If that rate cannot be readily determined, the lessee's incremental borrowing rate is used, being the rate that the individual lessee would have to pay to borrow the funds necessary to obtain an asset of similar value to the right-of-use asset in a similar economic environment with similar terms, security and conditions. The measurement includes non-cancellable lease payments (including inflation-linked payments), and also includes payments to be made in optional periods if the lessee was reasonably certain to exercise an option to extend the lease, or not to exercise an option to terminate the lease. For the asset and liabilities arising from a lease, see notes 10 and 14.

As a consequence, the Company recognises depreciation of the right-of-use asset and interest on the lease liability. The repayments of lease liability are separated into a principal portion and an interest portion and presented in the statement of cash flows separately as cashflows from financial (Payments for leases - principal) and operating activates (Interest paid), respectively.

The company applies IFRS 16 to all leases, including leases of right-of-use assets in a sublease, except for:

- Rights held by a lessee under licensing agreements within the scope of (IAS 38) Intangible Assets;
- Leases of intangible assets;
- Service concession arrangements within the scope of (IFRIC 12) Service Concession Arrangements; and
- Licenses of intellectual property granted (or sold) by Company lessors within the scope of IFRS 15 Revenue from Contracts with Customers.

Recognition exemptions

- The Company decided not to apply the short-term recognition exemptions to lease contracts, except for some minor
 and insignificant lease arrangements with a lease term of one month or less. Such very short-term leases and related
 asset classes are expensed as incurred and no additional quantitative disclosure is required;
- The Company decided not to apply the practical expedient with respect to low value items. Hence, they have to be recognized, measured and presented as lease arrangements in the scope of IFRS 16.

Lease term

The lease term refers to the period for which Company is reasonably certain to maintain the contract under the terms and conditions as originally negotiated. The initial lease term assessment is made at commencement of the lease. When determining the lease term, the shortest reasonably certain, i.e. justifiable, term is always to be used in case of doubt. The lease term assessment is largely based on management judgement and the Company usually use estimates or assumptions (especially in case of options and indefinite contracts) at an asset cluster level.

The commencement date of the lease (commencement date), is the date on which a lessor makes an underlying asset (i.e., the property, plant or equipment that is subject to the lease) available for use to the lessee. At the commencement date, the lease term begins and lease liability and the right-of-use asset is initially recognised and measured.

Options - "Reasonably certain criteria"

In assessing whether a lessee is reasonably certain to exercise an option to extend a lease, or not to exercise an option to terminate a lease, lessees shall considers all relevant facts and circumstances that create an economic incentive for the lessee to exercise the option to extend the lease, or not to exercise the option to terminate the lease.

Lease payments

Lease payments are defined as payments made by a lessee to a lessor relating to the right to use an underlying asset during the lease term.

In the definition of lease payments, the Company includes payments for non-lease components as well.

Reassessment of the lease liability

In terms of IFRS 16, a reassessment of the lease liability only takes place if the change is based on already existing contractual clauses, i.e. those that have been part of the contract since commencement.

A lessee reassesses the lease term, i.e. whether it is reasonably certain to exercise an extension option, or not to exercise a termination option, upon the occurrence of either a significant event or a significant change in circumstances that: is within the control of the lessee, or in specific circumstances outside the control of the lessee, and affects whether the lessee is reasonably certain to exercise an option not previously included in its determination of the lease term, or not to exercise an option previously included in its determination of the lease term.

Accounting for lease modifications

A lease modification is defined as "a change in the scope of a lease, or the consideration for a lease, that was not part of the original terms and conditions of the lease (for example, adding or terminating the right to use one or more underlying assets, or extending or shortening the contractual lease term)". Modification can also result from a change in consideration only. The effective date of the modification is defined as the date when both parties agree to a lease modification.

A lessee accounts for a lease modification as a separate lease if both of the following conditions are fulfilled:

- the modification increases the scope of the lease by adding the right to use one or more underlying assets; and
- the consideration for the lease increases by an amount equivalent to the stand-alone price for the increase in scope and any appropriate adjustments to that stand-alone price to reflect the circumstances of the particular contract.

When these conditions are met, the modification is considered to result in the creation of a new lease that is separate from the original lease. The agreement for the right to use one or more additional assets is accounted for as a separate lease (or leases) to which the requirements of IFRS 16 are applied independently of the original lease.

For a lease modification that is not a separate lease, i.e. that do not meet the conditions outlined above, at the effective date of the modification, the lessee accounts for the lease modification by remeasuring the lease liability using a discount rate determined at that date and:

- for lease modifications that decrease the scope of the lease, the lessee decreases the carrying amount of the right-ofuse asset to reflect the partial or full termination of the lease, and recognises a gain or loss that reflects the proportionate decrease in scope; and
- for all other lease modifications, the lessee makes a corresponding adjustment to the right-of-use asset.

When a lease arrangement is modified, then the revised lease payments will always be discounted with a revised discount rate. This is different from the requirements for a reassessment of the lease, where only in specific cases a revised discount rate is required.

2.18. Earnings per share

Basic earnings per share is calculated by dividing profit attributable to the equity holders of the Company for the period by the weighted average number of common stocks outstanding.

2.19. Dividend distribution

Dividends are recognized as a liability and debited against equity in the Company's financial statements in the period in which they are approved by the Company's shareholders.

2.20. Segments

The operating segments of the Company are based on the business lines, residential, business, wholesale and other, which is consistent with the internal reporting provided to the chief operating decision maker, the Chief Executive Officer (CEO) who is advised by the Management Committee (MC) of the Company. The CEO is responsible for allocating resources to, and assessing the performance of, the operating segments. The accounting policies and measurement principles of the operating segments are the same as those applied for the Company described in the Significant accounting policies (see note 2). In the financial statements, the segments are reported in a manner consistent with the internal reporting.

The operating segments' revenues include revenues from external customers and there are no internal revenues generated from other segments.

The operating segments' results are monitored by the CEO and the MC to Direct margin, which is defined by the Company as revenues less direct costs less Impairment losses on trade receivables and other assets.

The CEO and the MC do not monitor the assets and liabilities at segment level.

2.21. Comparative information

In order to maintain consistency with the current year presentation in the Financial statements and the Notes thereto, certain items have been reclassified for comparative purposes. Material changes in disclosures, if any, are described in detail in the relevant notes.

3. FINANCIAL RISK MANAGEMENT

3.1. Financial risk factors

The Company does not apply hedge accounting for its financial instruments, all gains and losses are recognized in the profit or loss. The Company is exposed in particular to credit risks related to its financial assets and risks from movements in exchange rates, interest rates, and market prices that affect the fair value and/or the cash flows arising from financial assets and liabilities. Financial risk management aims to limit these market and credit risks through ongoing operational and finance activities.

The detailed descriptions of risks, the management thereof as well as sensitivity analyses are provided below. Sensitivity analyses include potential changes in profit before tax. The potential impacts disclosed (less tax) are also applicable to the Company's Equity.

3.1.1. Market risk

Market risk is defined as the 'risk that the fair value or value of future cash flows of a financial instrument will fluctuate because of changes in market prices' and includes interest rate risk, currency risk and other price risk.

As the vast majority of the revenues and expenses of the Company arise in MKD, the functional currency of the Company is MKD, and as a result, the Company objective is to minimize the level of its financial risk in MKD terms.

For the presentation of market risks, IFRS 7 requires sensitivity analyses that show the effects of hypothetical changes of relevant risk variables on profit or loss and shareholders' equity. The periodic effects are determined by relating the hypothetical changes in the risk variables to the balance of financial instruments at the financial statement date. The balances at the end of the reporting period are usually representative for the year as a whole, therefore the impacts are calculated using the year end

balances as though the balances had been constant throughout the reporting period. The methods and assumptions used in the sensitivity calculations have been updated to reflect the current economic situation.

a) Foreign currency risk

The functional currency of the Company is the Macedonian denar.

The foreign exchange risk exposure of the Company is related to holding foreign currency cash balances, and operating activities through revenues from and payments to international telecommunications carriers as well as capital expenditure contracted with vendors in foreign currency.

The currency giving rise to this risk is primarily the EUR. The Company uses cash deposits in foreign currency, predominantly in EUR, and cash deposits in denars linked to foreign currency, to economically hedge its foreign currency risk in accordance with the available banks offers. The Company manages net liability foreign exchange risk through maintaining higher amount of deposits in EUR.

The foreign currency risk sensitivity information required by IFRS 7 is limited to the risks that arise on financial instruments denominated in currencies other than the functional currency in which they are measured.

At 31 December 2021, if MKD would have been 1% weaker or stronger against EUR, profit before tax would have been MKD 858 thousand in net balance higher or lower, respectively. At 31 December 2020, if MKD would have been 1% weaker or stronger against EUR, profit before tax would have been MKD 3,292 thousand in net balance lower or higher, respectively. At 31 December 2021, if MKD would have been MKD 3,292 thousand in net balance lower or higher, respectively. At 31 December 2021, if MKD would have been MKD 2,674 thousand in net balance lower or higher, respectively. At 31 December 2020, if MKD would have been 10% weaker or stronger against USD, profit before tax would have been MKD 3,788 thousand in net balance lower or higher, respectively.

b) Interest rate risk

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates.

Change in the interest rates and interest margins may influence financing costs and returns on financial investments.

The Company is minimizing interest rate risk through defining of fixed interest rates in the period of the validity of certain financial investments. On the other hand, fix term deposits may be prematurely terminated, since the contracts contain a clause that, the bank will calculate and pay interest by interest rate which is valid on the nearest maturity period of the deposit in accordance with the interest rates given in the offer.

In case of significant increase of the market interest rates, deposit may be terminated and replaced by new deposit with interest rate more favorable for the Company at lowest possible cost.

The investments are limited to relatively low risk financial investment forms in anticipation of earning a fair return relative to the risk being assumed.

The Company has no floating interest-bearing liabilities, while it incurs interest rate risk on cash deposits with banks and loans to employees. No policy to hedge the interest rate risk is in place. Changes in market interest rates affect the interest income on deposits with banks.

The Company had MKD 1,954,582 thousand deposits (only deposits with maturity more than 3 months) and cash in bank as at 31 December 2021, 1% rise in market interest rate would have caused (ceteris paribus) the interest received to increase with approximately MKD 17,591 thousand annually, resulting in increase of profit after tax, by same amount, while similar decrease would have caused the same decrease in profit after tax. The amount of deposits was MKD 2,115,179 thousand (only deposits with maturity more than 3 months) and cash in bank as at 31 December 2020. Therefore 1% rise in market interest rate would have caused (ceteris paribus) the interest received to increase with approximately MKD 19,037 thousand annually, resulting in increase of profit after tax, by same amount while similar decrease would have caused the same decrease in profit after tax.

c) Other price risk

The Company's investments are in equity of other entities that are publicly traded on the Macedonian Stock Exchange, both on its Official and Regular market. The management continuously monitors the portfolio equity investments based on fundamental and technical analysis of the shares. All buy and sell decisions are subject to approval by the relevant Company's bodies. In line with the Company strategy, the investments within portfolio are kept until there are favorable market conditions for their sale.

As part of the presentation of market risks, IFRS 7 also requires disclosures on how hypothetical changes in risk variables affect the price of financial instruments. As at 31 December 2021 and 31 December 2020, the Company holds investments, which could be affected by risk variables such as stock exchange prices.

The Company had MKD 214,920 thousand investments in equity of other entities that are publicly traded on the Macedonian Stock Exchange as at 31 December 2021, 20% rise in market price would have caused (ceteris paribus) MKD 42,984 thousand gain, while similar decrease would have caused the same loss in the profit before tax. The amount of the investments in equity of other entities that are publicly traded on the Macedonian Stock Exchange is MKD 140,881 thousand as at 31 December 2020, 20% rise in market price would have caused (ceteris paribus) MKD 28,176 thousand gain, while similar decrease would have caused the same loss in the profit before tax.

3.1.2. Credit risk

Credit risk is defined as the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.

The Company is exposed to credit risk from its operating activities and certain financing activities.

Counterparty limits are determined based on the provided Letter of guarantees in accordance with the market conditions of those banks willing to issue a bank guarantee. The total amount of bank guarantees that will be provided should cover the amount of the projected free cash of the Company.

With regard to financing activities, transactions are primarily to be concluded with counterparties (banks) that have at least a credit rating of BBB+ (or equivalent) or where the counterparty has provided a guarantee where the guarantor has to be at least BBB+ (or equivalent).

The depositing decisions are made based on the following priorities:

- To deposit in banks (Deutsche Telekom core banks, if possible) with provided bank guarantee from the banks with the best rating and the best quality wording of the bank guarantee;
- To deposit in banks with provided bank guarantee from the banks with lower rating and poorer quality wording of the bank guarantee;
- Upon harmonization and agreement with the parent company these rules can be altered for ensuring full credit risk coverage. If the total amount of deposits cannot be placed in banks covered with bank guarantees with at least BBB+ rating (or equivalent credit rating), then depositing will be performed in local banks without bank guarantee.

As of 31 December 2021, and 31 December 2020, cash and cash equivalents are not secured with guarantees. All cash and cash equivalent are allocated in four big domestic banks in Republic North Macedonia based on CAEL methodology rating for purpose of credit risk diversification and upon harmonization and agreement with the parent and ultimate parent companies.

The process of managing the credit risk from operating activities includes preventive measures such as creditability checking and prevention barring, corrective measures during legal relationship for example reminding and disconnection activities, collaboration with collection agencies and collection after legal relationship as litigation process and court proceedings. The overdue payments are monitored based on customer's type amount of debt, average invoiced amount and number of disconnections.

The credit risk is controlled through credibility checking – which determines that the customer is not indebted and the customer's credit worthiness and through preventive barring – which determinates the credit limit based on the customer's previous traffic revenues.

The Company has no significant concentration of credit risk with any single counter party or group of counter parties having similar characteristics.

The Company's procedures ensure on a permanent basis that sales are made to customers with an appropriate credit history and not exceed an acceptable credit exposure limit.

The maximum exposure to credit risk is represented by the carrying amount of each financial asset in the statement of financial position. Consequently, the Company considers that its maximum exposure is reflected by the amount of debtors net of provisions for impairment recognized and the amount of cash deposits in banks at the financial statement date.

3.1.3. Liquidity risk

Liquidity risk is the risk that an entity may encounter difficulty in meeting obligations associated with financial liabilities.

Liquidity risk is defined as the risk that the Company could not be able to settle or meet its obligations on time.

The investment portfolio should remain sufficiently liquid to meet all operating requirements that can be reasonably anticipated. This is accomplished by structuring the portfolio so that financial instruments mature concurrently with cash needs to meet anticipated demands.

The Company's policy is to maintain sufficient cash and cash equivalents to meet its commitments in the foreseeable future. Any excess cash is mostly deposited in commercial banks.

The Company's liquidity management process includes projecting cash flows by major currencies and considering the level of necessary liquid assets, considering business plan, historical collection and outflow data. Monthly, semi-annually and annually cash projections are prepared and updated on a daily basis.

The tables below show liabilities at 31 December 2021 and 2020 by their remaining contractual maturity. The amounts disclosed in the maturity table are the contractual undiscounted cash flows. Such undiscounted cash flows differ from the amount included in the statement of financial position because the statement of financial position amount is based on discounted cash flows. As the financial liabilities are paid from the cash generated from the ongoing operations, the maturity analysis of the financial assets as at the end of the reporting periods (in comparison with the financial liabilities) would not be useful, therefore, is not included in the tables below.

The maturity structure of the Company's contractual undiscounted cash flows as at 31 December 2021 is as follows:

In thousands of denars	Total	Demand and less than 1 month	From 1 to 3 months	From 3 to 12 months	From 12 months to 5 years
Trade payables	1,588,121	1,269,680	307,995	10,446	-
Liabilities to related parties	391,689	388,786	2,903	-	-
Other financial liabilities	1,023,068	87,636	187,958	244,341	503,133
	3,002,878	1,746,102	498,856	254,787	503,133

The maturity structure of the Company's contractual undiscounted cash flows as at 31 December 2020 is as follows:

In thousands of denars	Total	Demand and less than 1 month	From 1 to 3 months	From 3 to 12 months	From 12 months to 5 years
Trade payables	1,931,929	1,354,501	552,951	23,704	773
Liabilities to related parties	485,934	480,707	3,546	385	1,296
Other financial liabilities	981,731	56,024	151,166	319,094	455,447
	3,399,594	1,891,232	707,663	343,183	457,516

3.2. Capital management

The Company's objectives when managing capital are to safeguard the Company's ability to continue as a going concern in order to provide returns for shareholders and benefits for other stakeholders and to maintain an optimal capital structure to reduce the cost of capital. The total amount of equity managed by the Company, as at 31 December 2021, is MKD 14,978,110 thousand, in accordance with the adopted international financial reporting standards published in the "Official Gazette of the Republic of North Macedonia" (2020: MKD 14,638,028 thousand). Out of this amount MKD 9,583,888 thousand (2020: MKD 9,583,888 thousand) represent share capital and MKD 958,389 thousand (2020: MKD 958,389 thousand) represent statutory reserves, which are not distributable (see note 2.12). The Company has also acquired treasury shares (see notes 2.11 and 17.1). The transaction is in compliance with the local legal requirements that as a result of acquiring treasury shares the total equity of the Company shall not be less than the amount of the share capital and reserves which are not distributable to shareholders by law or by Company's statute. Part of the net profit generated as per the Financial Statements of the Company for the year 2020 in accordance with the adopted international financial reporting standards published in the "Official Gazette of the Republic of North Macedonia", in amount of MKD 345,475 thousand (2019: MKD 332,097 thousand) were transferred in retained earnings,

presented in same line in Statement of financial position, for investments in qualified tangible and intangible assets for purpose of tax reliefs utilization in 2021, in accordance with Income tax law (see note 25).

According the local legal requirements dividends can be paid out to the shareholders in amount that shall not exceed the net profit for the year as presented in the financial statements of the Company in accordance with the adopted international financial reporting standards published in the "Official Gazette of the Republic of North Macedonia", increased for the undistributed net profit from previous years or increased for the other distributable reserves, i.e. reserves that exceed the statutory reserves and other reserves defined by the Company's statute. The Company is in compliance with all statutory capital requirements.

3.3. Fair value estimation

Cash and cash equivalents, trade receivables and other current financial assets mainly have short term maturity. For this reason, their carrying amounts at the reporting date approximate their fair values (see note 28.1).

The fair value of the non-current portion of trade receivables and employee loans is determined by using discounted cash-flow valuation technique.

The fair value of publicly traded financial assets at fair value through profit or loss is based on quoted market prices at the financial statement date.

The Company classifies fair value measurements using a fair value hierarchy that reflects the significance of the inputs used in making the measurements. The fair value hierarchy has the following levels:

(a) quoted prices (unadjusted) in active markets for identical assets (Level 1);

(b) inputs other than quoted prices included within Level 1 that are observable for the asset, either directly or indirectly (Level 2); and

(c) inputs for the asset that are not based on observable market data (Level 3).

The level in the fair value hierarchy within which the fair value measurement is categorized in its entirety is determined on the basis of the lowest level input that is significant to the fair value measurement in its entirety. The significance of an input is assessed against the fair value measurement in its entirety.

The fair values in level 2 and level 3 of fair value hierarchy were estimated using the discounted cash flows valuation technique. The fair value of floating rate instruments that are not quoted in an active market was estimated to be equal to their carrying amount. The fair value of unquoted fixed interest rate instruments was estimated based on estimated future cash flows expected to be paid or received discounted at current interest rates for new instruments with similar credit risk and remaining maturity.

Financial assets carried at amortized cost

The fair value of floating rate instruments is normally approximated by their carrying amount. The estimated fair value of fixed interest rate instruments is based on estimated future cash flows expected to be received discounted at current interest rates for new instruments with similar credit risk and remaining maturity. Discount rates used depend on credit risk of the counterparty.

Liabilities carried at amortized cost

Fair values of financial liabilities were determined using valuation techniques. The estimated fair value of fixed interest rate instruments with stated maturity was estimated based on expected cash flows discounted at current interest rates for new instruments with similar credit risk and remaining maturity.

Financial liabilities included in the category Trade and other payables mainly have short term maturity. For this reason, their carrying amounts at the reporting date approximate their fair values.

The fair value of the long-term financial liabilities is determined by using discounted cash-flow valuation technique.

4. CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS

The Company makes estimates and assumptions concerning the future. Estimates and judgments are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. The most critical estimates and assumptions are outlined below.

4.1. Useful lives of assets

The determination of the useful lives of assets is based on historical experience with similar assets as well as any anticipated technological development and changes in broad economic or industry factors. The appropriateness of the estimated useful lives is reviewed annually, or whenever there is an indication of significant changes in the underlying assumptions. We believe that the accounting estimate related to the determination of the useful lives of assets is a critical accounting estimate since it involves assumptions about technological development in an innovative industry and heavily dependent on the investment plans of the Company. Further, due to the significant weight of depreciable assets in our total assets, the impact of any changes in these assumptions could be material to our financial position, and results of operations. As an example, if the Company was to shorten the average useful life of its assets by 10%, this would result in additional annual depreciation and amortization expense of approximately MKD 337,702 thousand (2020: MKD 316,100 thousand). See note 11 and 12 for the changes made to useful lives in 2021.

The Company constantly introduces a number of new services or platforms including, but not limited to, the Universal Mobile Telecommunications System (UMTS) and the Long-Term Evolution (LTE) based broadband services in the mobile communications and the fiber-to-the-home rollout in the fixed line operations. In case of the introduction of such new services, the Company conducts a revision of useful lives of the already existing platforms, but in the vast majority of the cases these new services are designed to co-exist with the existing platforms, resulting in no change-over to the new technology. Consequently, the useful lives of the existing platforms usually do not require shortening.

4.2. Estimated impairment of property, plant and equipment, and intangible assets

We assess the impairment of identifiable property, plant, equipment and intangibles whenever there is a reason to believe that the carrying value may materially exceed the recoverable amount and where impairment of value is anticipated. The calculations of recoverable amounts are primarily determined by value in use calculations, which use a broad range of estimates and factors affecting those. Among others, we typically consider future revenues and expenses, technological obsolescence, discontinuance of services and other changes in circumstances that may indicate impairment. If impairment is identified using the value in use calculations, we also determine the fair value less cost to sell (if determinable), to calculate the exact amount of impairment to be charged. As this exercise is highly judgmental, the amount of a potential impairment may be significantly different from that of the result of these calculations. Management has performed an impairment test based on a 10 years cash flow projection and used a perpetual growth rate of 1% (2020: 2%) to determine the terminal value after 10 years. The discount rate used was 7.42% (2020: 7.42%). The impairment test did not result in impairment.

4.3. Estimated expected credit loss of trade and other receivables

We calculate expected credit loss (ECL) for doubtful accounts based on estimated losses resulting from the inability of our customers to make the required payments. The loss allowance is recognized in respect of not only losses already incurred as of the reporting date (incurred losses) but also losses which have not yet incurred as of the reporting date but which are expected to be incurred in the future (expected losses). For the largest customers, international customers and for customers under liquidation and bankruptcy proceedings ECL is calculated on an individual basis, while for other customers it is estimated on a portfolio basis, for which we base our estimate on the aging of our account receivables balance and our historical write-off experience, customer credit-worthiness and recent changes in our customer payment terms (see note 2.3.1). These factors are reviewed annually, and changes are made to the calculations when necessary. In addition, we consider also the nature of the business (residential, business, fixed line, mobile etc.) and the environment in which the Company operates. Management paid particular attention to the solvency of customers due to COVID-19 however, based on experiences of last months and expectations considering the future COVID effects, no material effects on bad debt rate. In 2021 the Company carried out regular detailed analysis on the portfolio of customers on which collective assessment of impairment is performed which resulted in changes in the related impairment rates due to different payment behavior, resulting in new impairment rates of trade and other receivables in 2021. If the financial condition of our customers were to deteriorate, actual write-offs of currently existing receivables may be higher than expected and may exceed the level of the ECL recognized so far (see note 3.1.2).

4.4. Provisions

Provisions in general are highly judgmental, especially in case of legal disputes. The Company assesses the probability of an adverse event as a result of a past event and if the probability of an outflow of economic benefits is evaluated to be more than 50%, the Company fully provides for the total amount of the estimated liability (see note 2.9). As the assessment of the

probability is highly judgmental, in some cases the evaluation may not prove to be in line with the eventual outcome of the case. In order to determine the probabilities of an adverse outcome, the Company uses internal and external legal counsel (see note 16 and 29).

4.5. Costs of obtaining contracts with customers

The Company recognizes assets for costs incurred in connection with the signing of customer contracts which would not have been incurred if the customer contract had not been concluded. Capitalization is subject to the expectation that those costs will be recovered by future revenues resulting from the contract.

Costs of obtaining a contract with a customer includes sales commission to its employees, master dealer and sales agents. Costs of obtaining a contract with a customer are amortised during the average customer retention period which is based on historical customer retention data and past experiences in that business segment.

The Company decided not to use the practical expedient to expense incremental costs of obtaining a contract immediately, instead these are amortized over a period of one year or less.

5. CASH AND CASH EQUIVALENTS

In thousands of denars	31.12.2021	31.12.2020	
Cash in bank Cash on hand	1,276,685 14,721 1,291,406	1,621,067 14,676 1,635,743	
The carrying amounts of the cash and cash equivalents are denominated in	n the following currencies:		
In thousands of denars	31.12.2021	31.12.2020	
MKD EUR USD	497,442 774,875 <u>19,089</u> <u>1,291,406</u>	1,148,388 483,384 3,971 1,635,743	
Following is the breakdown of cash in bank by credit rating in local banks without bank guarantee (see note 3.1.2):			
In thousands of denars	31.12.2021	31.12.2020	

Credit rating: A	60,347	254,087
Credit rating: BB+	504,723	588,478
Credit rating: B	143	273
Credit rating: B-	132,919	-
Credit rating: CCC+	-	286,700
Cash in local banks without rating	578,553_	491,529
	1,276,685	1,621,067

The credit ratings in the table above represent either the credit rating of the local bank or the credit rating of the parent bank if no rating is available for the local bank.

6. DEPOSITS WITH BANKS

Deposits with banks represent cash deposits in reputable domestic banks, with interest rate of 0.15% p.a. to 0.85% p.a. and with maturity between 3 and 12 months.

The carrying amounts of the deposits with banks are denominated in the following currencies:

In thousands of denars	31.12.2021	31.12.2020
EUR	<u> </u>	494,112

Following is the breakdown of	f deposits with banks without ba	nk guarantee (see note 3.1.2):

In thousands of denars	31.12.2021	31.12.2020
Credit rating: A	369,762	308,993
Credit rating: CCC+	-	185,119
Credit rating: B-	308,135	-
	677,897	494,112
7. TRADE RECEIVABLES AND OTHER ASSETS		
In thousands of denars	31.12.2021	31.12.2020
Trade debtors – domestic	4,680,448	4,883,427
Less: allowance for expected credit losses	(1,922,640)	(1,990,207)
Trade debtors – domestic – net	2,757,808	2,893,220
Trade debtors – foreign	131,119	101,737
Less: allowance for expected credit losses	(39,022)	(34,767)
Trade debtors – foreign – net	92,097	66,970
Receivables from related parties	181,594	178,776
Contract assets	370,604	373,954
Less: allowance for expected credit losses	(101,936)	(101,674)
Contract assets net	268,668	272,280
Loans to employees	14,104	19,110
Other receivables	13,492	13,018
Financial assets	3,327,763	3,443,374
Contract costs	55,059	47,137
Advances paid to suppliers	103,406	89,732
Less: allowance for expected credit losses	(74,252)	(65,112)
Advances paid to suppliers – net	29,154	24,620
Prepayments	182,911_	167,519
	3,594,887	3,682,650
Less non-current portion: Loans to employees	(9,766)	(13,643)
Less non-current portion: Trade debtors – domestic	(379,168)	(402,008)
Les non-current portion: Contract asset	(80,818)	(79,418)
Les non-current portion: Contract costs	(9,863)	(10,148)
Current portion	3,115,272	3,177,433

Receivables from related parties represent receivables from members of Magyar Telekom Group and Deutsche Telekom Group (see note 30).

Loans to employees are collateralized by mortgages over real estate or with promissory note. Loans granted to employees carry effective interest rate of 4.55% p.a. (2020: 4.55% p.a.).

The non-current portion of Loans to employees represents receivables that are due within 7 years of the financial statement date. The non-current portion of domestic trade receivables represents receivables that are due within 6 years of the financial statement date.

Current portion of domestic trade receivables is in amount MKD 4,301,280 thousand (2020: MKD 4,481,419 thousand) and below are analyzed in light of four categories: past due and impaired, past due and not impaired, not past due and impaired and neither past due nor impaired.

As at 31 December 2021, domestic trade debtors of MKD 2,355,818 thousand (2020: MKD 2,458,569 thousand) are impaired.

The aging of these receivables is as follows:

In thousands of denars	31.12.2021	31.12.2020
Less than 30 days	282,474	306,218
Between 31 and 180 days	135,152	142,206
Between 181 and 360 days	85,312	85,232
More than 360 days	1,852,880	1,924,913
	2,355,818	2,458,569

As at 31 December 2021, domestic trade receivables in amount of MKD 70,369 thousand (2020: MKD 46,703 thousand) were past due but not impaired. These are mainly related to specified business and governmental customers that belong to certain age bands and are past due but not impaired, based on past experience of payment behavior, as well as the domestic trade receivables whose terms have been renegotiated and it is not impaired since the collectability of the renegotiated cash flows is considered ensured, and customers for interconnection services assessed on individual basis in accordance with past Company experience and current expectations (see notes 2.3 and 4.3).

The analysis of these past due domestic trade receivables is as follows:

In thousands of denars	31.12.2021	31.12.2020
Less than 30 days	46,707	7,553
Between 31 and 60 days	1,263	7,855
Between 61 and 90 days	1,803	1,702
Between 91 and 180 days	3,929	2,882
Between 181 and 360 days	2,609	1,308
More than 360 days	14,058	25,403
	70,369	46,703

The Company has renegotiated domestic trade receivables in carrying amount of MKD 10,112 thousand (2020: MKD 11,245 thousand). The carrying amount of trade and other receivables, which would otherwise be past due, whose terms have been renegotiated is not impaired if the collectability of the renegotiated cash flows are considered ensured.

Domestic trade receivables neither past due nor impaired are in amount MKD 145,221 thousand (2020: 276,166 thousand).

With the transition to IFRS 9, loss allowance is recognized in respect of not only losses already incurred as of the reporting date (incurred losses) but also losses which have not yet incurred as of the reporting date but which are expected to be incurred in the future (expected losses), which effects in impairment of invoices which are not yet due in amount of MKD 1,729,872 ('zero-day impairment calculation'), (2020: MKD 1,699,981).

As at 31 December 2021, invoiced foreign trade debtors of MKD 39,022 thousand (2020: MKD 34,767 thousand) are impaired.

The aging of these receivables is as follows:

In thousands of denars	31.12.2021	31.12.2020
More than 360 days	39,022	34,767
	39,022	34,767

As at 31 December 2021, foreign trade receivables in amount of MKD 17,937 thousand (2020: MKD 16,384 thousand) were past due but not impaired. These relate to a number of international customers assessed on individual basis in accordance with past Company experience and current expectations.

The analysis of these past due but not impaired invoiced foreign trade receivables is as follows:

In thousands of denars	31.12.2021	31.12.2020
Less than 30 days	1,345	1,553
Between 31 and 60 days	297	812
Between 61 and 90 days	195	503
Between 91 and 180 days	493	2,922
Between 181 and 360 days	901	3,241
More than 360 days	14,706	7,353
	17,937	16,384

Foreign trade receivables neither past due nor impaired are in amount MKD 74,160 thousand (2020: 50,586 thousand).

The carrying amounts of the Company's non-current trade receivables and other assets are denominated in MKD.

The carrying amounts of the Company's current trade receivables and other assets are denominated in the following currencies:

In thousands of denars	31.12.2021	31.12.2020
MKD	2,778,461	2,860,651
EUR	247,956	292,792
USD	85,434	22,134
Other	3,421	1,856
	3,115,272	3,177,433

The total amount of the provision from expected credit losses (ECL) for domestic trade debtors is MKD 1,922,640 thousand (2020: MKD 1,990,207 thousand). Out of this amount MKD 1,647,049 thousand (2020: MKD 1,747,807 thousand) relate to provision made according the aging structure of the above receivables, while the amount of MKD 102,940 thousand (2020: MKD 101,210 thousand) is from customers under liquidation and bankruptcy which are fully impaired. In addition, the Company has a specific provision calculated in respect of a certain group of customers in amount of MKD 172,651 thousand (2020: MKD 141,190 thousand). The total amount of the provision for foreign trade debtors is MKD 39,022 thousand (2020: MKD 34,767 thousand). The total amount of the provision for contract assets is MKD 101,936 thousand (2020: MKD 101,674).

Movement in allowance for ECL of trade receivables:

In thousands of denars	31.12.2021	31.12.2020
ECL at 1 January	2,024,974	1,995,013
Charge for the year	117,040	120,880
Utilization	(180,352)	(90,919)
ECL at 31 December	1,961,662	2,024,974

Amounts charged to the allowance account are generally written off when there is no expectation of recovering additional cash.

Movement in allowance for ECL of contract assets:

In thousands of denars	31.12.2021	31.12.2020
ECL at 1 January Charge for the year	101,674 67.923	113,806 50,073
Utilization	(67,661)	(62,205)
ECL at 31 December	101,936	101,674

8. TAXES

8.1. Other taxes receivable

In thousands of denars	31.12.2021	31.12.2020
Other taxes receivable	930	<u>930</u> 930
8.2. Other taxes payable		
In thousands of denars	31.12.2021	31.12.2020
VAT and other tax payables	<u>28,713</u> 28,713	45,743
9. INVENTORIES		
In thousands of denars	31.12.2021	31.12.2020
Materials Inventories for resale Allowance for inventories	133,212 381,815 (17,296) 497,731	138,436 230,814 (17,055) 352,195
Movement in allowance for inventories:		
In thousands of denars	31.12.2021	31.12.2020
Allowance at 1 January Write down of inventories	17,055	39,819 27,053
Write down/(release) of inventories to net realizable value Write off Allowance at 31 December	3,741 (3,500) 17,296	(15,525) (34,292) 17,055

Allowance for inventory mainly relates to inventories for resale and obsolete materials. Write down of inventories to net realizable value is based on the analysis of the lower of cost and net realizable value at the financial statement dates. Effect of write down of inventories is presented in note 20 Other operating expenses.

10. RIGHT OF USE ASSETS

			Leased	Leased	
	Leased land	Leased	technical	vehicles and	
In thousands of denars	assets	building assets	equipment	other equipment	Total
Cost					
At 1 January 2020	164,976	321,842	247	26,893	513,958
Additions	32,244	95,836	235	3,373	131,688
Disposals	(2,482)	(23,011)	(482)	-	(25,975)
At 31 December 2020	194,738	394,667	-	30,266	619,671
Depreciation					
At 1 January 2020	40,421	88,389	103	3,066	131,979
Charge for the year	38,585	71,900	135	6,619	117,239
Disposals	(1,236)	(8,790)	(238)	-	(10,264)
At 31 December 2020	77,770	151,499	-	9,685	238,954
Carrying amount					
At 1 January 2020	124,555	233,453	144	23,827	381,979
At 31 December 2020	116,968	243,168	-	20,581	380,717

In thousands of denars	Leased land assets	Leased building assets	Leased vehicles and other equipment	Total
Cost				
At 1 January 2021	194,738	394,667	30,266	619,671
Additions	41,155	84,239	69,898	195,292
Disposals	(1,440)	(2,281)	-	(3,721)
At 31 December 2021	234,453	476,625	100,164	811,242
Depreciation At 1 January 2021 Charge for the year Disposals At 31 December 2021	77,770 39,474 (908) 116,336	151,499 79,201 (1,131) 229,569	9,685 9,381 19,066	238,954 128,056 (2,039) 364,971
Carrying amount				
At 1 January 2021	116,968	243,168	20,581	380,717
At 31 December 2021	118,117	247,056	81,098	446,271

Corresponding lease liabilities are presented in the note 14.

Leases of land and buildings for purposes to place antennas and base station has generally lease terms 10 years, and rents for shops are generally between 1 and 5 years, while vehicles and other equipment generally have lease terms of 5 years.

The Company is subleasing part of right-of-use assets, and the income for 2021 is in amount of MKD 10,307 thousand, (2020: MKD 9,660 thousand).

11. PROPERTY, PLANT AND EQUIPMENT

			Teleco-			
			mmunication		Assets under	
In thousands of denars	Land	Buildings	equipment	Other	construction	Total
Cost						
At 1 January 2020	10,754	5,571,823	23,317,059	3,844,398	1,578,324	34,322,358
Additions	23	3,617	649,819	157,859	(86,838)	724,480
Assets activation (see note						
12)	-	33,031	757,166	238,139	(1,028,336)	-
Disposals	-	(38,152)	(481,950)	(797,388)	-	(1,317,490)
At 31 December 2020	10,777	5,570,319	24,242,094	3,443,008	463,150	33,729,348
Depreciation						
At 1 January 2020	-	2,562,406	17,083,185	3,162,240	-	22,807,831
Charge for the year	-	170,771	1,093,315	307,703	-	1,571,789
Disposals	-	(38,152)	(481,950)	(776,142)	-	(1,296,244)
Transfer between group of						
assets	-	-	(323)	323	-	-
At 31 December 2020	-	2,695,025	17,694,227	2,694,124	-	23,083,376
Carrying amount						
At 1 January 2020	10,754	3,009,417	6,233,874	682,158	1,578,324	11,514,527
At 31 December 2020	10,777	2,875,294	6,547,867	748,884	463,150	10,645,972

			Teleco-			
			mmunication		Assets under	
In thousands of denars	Land	Buildings	equipment	Other	construction	Total
Cost						
At 1 January 2021	10,777	5,570,319	24,242,094	3,443,008	463,150	33,729,348
Additions	-	89	640,134	37,466	898,148	1,575,837
Assets activation/transfers						
between group of assets	-	-	204,428	(71,319)	(133,109)	-
Correction in the initial						
balances	-	26,936	647,994	(665,448)	9,435	18,917
Transfer to asset held for						
sale	-	(4,472)	-	-	-	(4,472)
Disposals	-	-	(97,257)	(157,390)	(57)	(254,704)
At 31 December 2021	10,777	5,592,872	25,637,393	2,586,317	1,237,567	35,064,926
Depreciation						
, At 1 January 2021	-	2,695,025	17,694,227	2,694,124	-	23,083,376
Charge for the year	-	138,052	1,570,091	155,189	-	1,863,332
Disposals	-	-	(97,097)	(151,009)	-	(248,106)
Correction in the initial			, . ,	,		· · · /
balances	-	15,389	492,975	(499,926)	-	8,438
Transfer to asset held for						
sale	-	(3,040)	-	-	-	(3,040)
Transfer between group of						
assets	-	-	62,303	(62,303)	-	-
At 31 December 2021	-	2,845,426	19,722,499	2,136,075	-	24,704,000
Carrying amount						
At 1 January 2021	10,777	2,875,294	6,547,867	748,884	463,150	10,645,972
At 31 December 2021	10,777	2,747,446	5,914,894	450,242	1,237,567	10,360,926

In 2021 and 2020, the Company has no capitalized expenditures related to obtaining complete documentation for base stations. In 2021, the Company has no capitalized expenditures related to obtaining complete documentation for fixed line infrastructure in accordance to applicable laws in Republic of North Macedonia (see note 2.6) (2020: MKD 156 thousand).

Regular reviews of the useful lives and residual values of property, plant and equipment during 2021 affected the lives of a several types of assets, mainly transmition systems, telephone lines, exchanges and other technical equipment. The change of the useful life on the affected assets was made due to technological changes and business plans of the Company (see note 4.1). The Company has started the Radio access network (RAN) modernization project in 2021, which scope includes modernization (swap) of existing 2G, 3G, 4G network, technology upgrades to 5G and rollout of new 4G/5G base stations. The scope modernization relates to swap of RAN and MW (microwave) hardware equipment (base stations hardware, licenses and antennas, RAN controllers, RAN OSS elements). Due to the earlier replacement of the existing equipment, initially defined useful life has been shortened and result in accelerated depreciation in 2021 and 2022 compared to initially scheduled depreciation. The split of additional accelerated depreciation per years is calculated based on the dynamic of the replacement and in line with best available information. The reviews resulted in the following change in the original trend of depreciation in the current and future years.

In thousands of denars	2021	2022	2023	2024	After 2024
Increase/(decrease) in depreciation	391,010	23,178	(119,856)	(71,001)	(267,160)
	391,010	23,178	(119,856)	(71,001)	(267,160)

12. INTANGIBLE ASSETS

			TV content	Assets	
	Software and	Concession	rights and	under	
In thousands of denars	software licenses	license	other	construction	Total
Cost					
At 1 January 2020	5,285,310	1,525,417	1,407,903	228,420	8,447,050
Additions	527,060	-	793,810	108,910	1,429,780
Assets activation (see note 11)	230,056	-	-	(230,056)	-
Disposals	(653,394)	-	(431,938)	-	(1,085,332)
At 31 December 2020	5,389,032	1,525,417	1,769,775	107,274	8,791,498
Amortization					
	1 200 062	1 010 001	700 701		6 001 674
At 1 January 2020	4,280,062	1,018,831	782,781	-	6,081,674
Charge for the year	582,762	38,959	534,154	-	1,155,875
Disposals	(652,582)	-	(431,938)	-	(1,084,520)
At 31 December 2020	4,210,242	1,057,790	884,997		6,153,029
Correling amount					
Carrying amount					
At 1 January 2020	1,005,248	506,586	625,122	228,420	2,365,376
At 31 December 2020	1,178,790	467,627	884,778	107,274	2,638,469

In 2020 seven contracts (including the prolongation of cooperation) for TV content rights were identified as qualifying for capitalization. Accordingly, these rights were recognized in 2020 in Intangible assets, category TV content rights and other, at the net present value of future payments in amount of MKD 793,810 thousand and will be amortized over the contracts term (see note 13 and 22).

	Software and	Concession	TV content rights	Assets under	
In thousands of denars	software licenses	license	and other	construction	Total
Cost					
At 1 January 2021	5,389,032	1,525,417	1,769,775	107,274	8,791,498
Additions	385,318	185,085	497,599	145,620	1,213,622
Assets activation	65,291	-	-	(65,291)	-
Correction in the initial balances	(9,482)	-	-	(9,435)	(18,917)
Disposals	(217,893)	-	(656,217)	-	(874,110)
At 31 December 2021	5,612,266	1,710,502	1,611,157	178,168	9,112,093
A					
Amortization	4.040.040	4 057 700	004007		0 4 5 0 0 0 0
At 1 January 2021	4,210,242	1,057,790	884,997	-	6,153,029
Charge for the year	475,768	41,163	531,003	-	1.047,934
Disposals	(217,893)	-	(656,217)	-	(874,110)
Correction in the initial balances	(8,438)	-	-	-	(8,438)
At 31 December 2021	4,459,679	1,098,953	759,783	-	6,318,415
Carrying amount					
At 1 January 2021	1,178,790	467,627	884,778	107,274	2,638,469
At 31 December 2021	1,152,587	611,549	851,374	178,168	2,793,678

In 2021 two contracts (including the prolongation of cooperation) for TV content rights were identified as qualifying for capitalization. Accordingly, these rights were recognized in 2021 in Intangible assets, category TV content rights and other, at the net present value of future payments in amount of MKD 497,599 thousand and will be amortized over the contracts term (see note 13 and 22).

The reviews of the useful lives of intangible assets during 2021 affected the lives of a number of assets, mainly license and software. The change on the useful life of the affected intangible assets was made according to technological changes and

business plans of the Company. The reviews resulted in the following change in the original trend of amortization in the current and future years:

In thousands of denars	2021	2022	2023	2024	After 2024
(Decrease)/increase in amortization	(64,549)	(50,280)	1,524	90,206	23,099
=	(64,549)	(50,280)	1,524	90,206	23,099
13. TRADE PAYABLES AND OTHER LIABI	LITIES				
In thousands of denars			31.12.2021		31.12.2020
Trade payables - domestic			1,031,055		1,429,558
Trade payables - foreign			557,066		502,371
Liabilities to related parties			391,688		485,934
Dividends payable			4,455		3,918
Liabilities for TV content right			937,912		942,425
Other financial liabilities			14,640		11,138
Financial liabilities			2,936,816		3,375,344
Contract Liability			283,676		238,666
Deferred revenue			5,644		10,925
Other			126,142		131,097
			3,352,278		3,756,032
Less non-current portion:					
Deferred revenue			-		(556)
Contract Liability			(7)		(66)
Liabilities for TV content right			(460,600)		(416,360)
Current portion			2,891,671		3,339,050

Balances in the table above includes liabilities (Contract liabilities) recognized with regard to IFRS 15. Liabilities to related parties represent liabilities to members Magyar Telekom Group and Deutsche Telekom Group (see note 30).

Financial liabilities of MKD 937,912 thousand (2020: MKD 942,425 thousand) represent the carrying amount of long-term payables related to the capitalization of certain content right contracts in, 2018, 2019, 2020 and 2021 (see note 12). These liabilities are recognized initially at the net present value of future payments and subsequently measured at amortized cost using the effective interest method. The unwinding of the discount is being recognized in interest expense in profit or loss (see note 22). The carrying amount of these liabilities approximates their fair value as the related cash flows are discounted with an interest rate of 3.25% p.a. which is observable at the market for similar long-term financial liabilities. The remaining balance of other financial liabilities arises from contractual obligations for various transactions, from the ordinary course of business of the Company.

The movement of the liabilities for TV content right:

In thousands of denars	2021	2020
1 January	942,425	681,879
Addition	497,599	793,810
Interest charged	24,861	32,228
Repayment of capital	(496,163)	(525,562)
Repayment of interest	(29,213)	(32,228)
Effect from exchange rate valuation	(1,597)	(7,702)
31 December	937,912	942,425

The carrying amounts of the current portion of trade and other payables are denominated in the following currencies:

In thousands of denars	31.12.2021	31.12.2020
MKD EUR USD Other	1,138,308 1,614,956 131,266 <u>7,141</u> 2,891,671	1,620,678 1,598,907 113,987 <u>5,478</u> 3,339,050
14. LEASE LIABILITIES		
Analyses of total lease liabilities:		
In thousands of denars	31.12.2021	31.12.2020
Current Non-current	125,308 317,212 442,520	110,620 268,031 378,651
Asset related to these lease liabilities are presented in note 10.		
The carrying amounts of lease liabilities are denominated in the following c	urrencies	
In thousands of denars	31.12.2021	31.12.2020
EUR MKD	410,799 31,721 442,520	350,895 37,756 378,651

Future cash outflows to which the Company is potentially exposed due to the extension options in the lease contracts which are not reflected in the measurement of lease liabilities are in amount of MKD 84,604 thousand.

15. DEFERRED INCOME TAX

Recognized deferred income tax (assets)/liabilities are attributable to the following items:

In thousands of denars	Ass	sets	Liab	ilities	N	et
	31.12.2021	31.12.2020	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Property, plant and equipment Intangible assets IFRS 15 (Right of use asset)/Lease	(26,059)	(20,093)	44,089 - 39,247	72,921 37,343	44,089 (26,059) 39,247	72,921 (20,093) 37,343
Liabilities of IFRS 16	(44,252)	(37,865)	44,627	38,071	375	206
Tax (assets)/liabilities	(70,311)	(57,958)	127,963	148,335	57,652	90,377

Movement in temporary differences during the year

In thousands of denars	Balance 1 January 2021	Effects on profit	Balance 31 December 2021
Property, plant and equipment	72,921	(28,832)	44,089
Intangible assets	(20,093)	(5,966)	(26,059)
IFRS 15	37,343	1,904	39,247
(Right of use asset)/Lease Liabilities of IFRS 16	206	169	375
	90,377	(32,725)	57,652

In thousands of denars	Balance 1 January 2020	Effects on profit	Balance 31 December 2020
Property, plant and equipment Intangible assets IFRS 15	89,667 (9,214) 25,786	(16,746) (10,879)	72,921 (20,093) 27,242
(Right of use asset)/Lease Liabilities of IFRS 16	35,786 (596) 115,643	1,557 802 (25,266)	37,343 206 90,377

The temporary differences presented above relates to different carrying amount of property, plant and equipment and intangible assets as these assets were restated in accordance with statutory requirements in previous years at the year-end using official revaluation coefficients based on the general manufactured goods price increase index and in addition the tax prescribed deprecation rates and currently applicable rules. With the transition to the IFRS 15 and IFRS 16, the standards on Revenue from contracts with customers and Lease, temporary difference arise, as these standards are not part of the adopted international financial reporting standards published in the "Official Gazette of the Republic of North Macedonia".

16. PROVISION FOR LIABILITIES AND CHARGES

In thousands of denars	Legal cases	Employee benefits	Total
1 January 2020	172,460	48,910	221,370
Additional provision	9,816	30,741	40,557
Unused amount reversed	(177,168)	(692)	(177,860)
Used during period	-	(11,221)	(11,221)
31 December 2020	5,108	67,738	72,846
In thousands of denars	Legal cases	Employee benefits	Total
1 January 2021	5,108	67,738	72,846
Additional provision	38,789	36,223	75,012
Unused amount reversed	(735)	(2,469)	(3,204)
Used during period		(14,309)	(14,309)
31 December 2021	43,162	87,183	130,345
Analysis of total provisions:			
In thousands of denars		31.12.2021	31.12.2020
Non-current (Other)		64,281	54,264
Current		66,064	18,582
		130,345	72,846

Provisions for legal cases relate to certain legal and regulatory claims brought against the Company.

There are a number of legal cases for which provisions were recognized. Management recognizes a provision for its best estimate of the obligation but does not disclose the information required by paragraph 85 of IAS 37 because the management believes that to do so would seriously prejudice the outcome of the case. Management does not expect that the outcome of these legal claims will give rise to any significant loss beyond the amounts provided at 31 December 2021.

Other includes provision made for the legal or contractual obligation of the Company to pay to employees three average monthly salaries in Republic of North Macedonia at their retirement date (see note 2.14.1) and provision for long-term incentive programs (see note 31). The provision is recognized against Personnel expenses in the profit or loss.

17. CAPITAL AND RESERVES

Share capital consists of the following:

In thousands of denars	31.12.2021	31.12.2020
Ordinary shares Golden share	9,583,878 10	9,583,878 10
	9,583,888	9,583,888

Share capital consists of one golden share with a nominal value of MKD 9,733 and 95,838,780 ordinary shares with a nominal value of MKD 100 each.

The golden share with a nominal value of MKD 9,733 is held by the Government of the Republic of North Macedonia. In accordance with Article 16 of the Statute, the golden shareholder has additional rights not vested in the holders of ordinary shares. Namely, no decision or resolution of the Shareholders' Assembly related to: generating, distributing or issuing of share capital; integration, merging, separation, consolidation, transformation, reconstruction, termination or liquidation of the Company; alteration of the Company's principal business activities or the scope thereof; sale or abandonment either of the principal business activities or of significant assets of the Company; amendment of the Statute of the Company in such a way so as to modify or cancel the rights arising from the golden share; or change of the brand name of the Company; is valid if the holder of the golden share, votes against the respective resolution or decision. The rights vested in the holder of the golden share are given in details in the Company's Statute.

As at 31 December 2021 and 2020, the shares of the Company were held as follows:

In thousands of denars	31.12.2021	%	31.12.2020	%
Stonebridge AD Skopje	4,887,778	51.00	4,887,778	51.00
Government of the Republic of North Macedonia	3,336,497	34.81	3,336,497	34.81
The Company (treasury shares)	958,388	10.00	958,388	10.00
International Finance Corporation (IFC)	101,120	1.06	139,220	1.45
Other minority shareholders	300,105	3.13	262,005	2.74
	9,583,888	100.00	9,583,888	100.00

17.1. Treasury shares

The Company acquired 9,583,878 of its own shares, representing 10% of its shares, through the Macedonian Stock Exchange during June 2006. The total amount paid to acquire the shares, net of income tax, was MKD 3,843,505 thousand. The shares are held as treasury shares. As a result of the findings of the Investigation, for one consultancy contract, the payments of which was erroneously capitalized as part of treasury shares in 2006 has been retrospectively derecognized from treasury shares (see note 35).

The amount of treasury shares of MKD 3,738,358 thousand (after restatement), has been deducted from shareholders' equity. The Company has the right to reissue these shares at a later date. All shares issued by the Company were fully paid.

18. REVENUES

In thousands of denars	2021	2020
Revenues from fixed line operations		
TV	937,736	905,749
Internet	881,606	861,800
Voice retail	859,288	885,218
Wholesale	574,544	448,774
Data	482,525	474,750
Equipment	37,879	55,220
Other	126,959	121,698
	3,900,537	3,753,209
Revenues from mobile operations		
Voice retail	2,194,820	2,207,738
Equipment	1,614,472	1,669,289
Internet	1,562,855	1,426,409
Wholesale	671,318	628,488
Data	382,036	281,501
Content	86,013	110,302
Voice visitor	63,004	35,046
Other	293,696	280,581
	6,868,214	6,639,354
	450 404	740.000
SI/IT revenues	452,134	712,338
Other services	53,194	35,504
	11,274,079	11,140,405
Of which:		
Revenue from contracts with customers	11,152,158	11,024,648
Other sources	121,921	115,757
	121,021	110,101

Other sources of revenue include rental fees, and other revenues which are presented above in the Revenue from other sources Other fixed revenues and Other mobile revenues.

Equipment revenue is recognized at a point in time while service revenue is recognized over time. SI/IT revenue is recognized mostly over time and to a lesser extent at a point in time depending on the project.

In order to maintain consistency with the current year presentation the revenues presented in 2020 as Other fixed revenues in the amount of MKD 12,396 thousand were reclassified to other operation income in these financial statements (see note 21). The reclassification had no impact on equity or net profit.

In course of 2021 the Company has changed the allocation of revenue elements for mobile portfolio bunder tariffs affecting revenue lines from mobile operation: Voice retail, Internet and Data. The update in the revenue separation model is done based on increased usage consumption of mobile internet service and decrease in usage of SMS and voice services, strong growth in average usage per subscriber for mobile internet and cost of voice services has been declining. Therefore, the conclusion was more weight from the monthly subscription in bundle tariffs to be distributed on mobile internet service line. Based on the calculation, effects are: MKD 37 million are presented in internet revenue line, and on other side decrease in MKD 34 million in Voice retail and MKD 3 million in Data. At the moment the Company cannot reliably estimate effects in future period. The reclassification had no impact on total revenue from mobile operation, net profit or equity.

18.1. Assets and liabilities related to the contracts with customers

Contract assets of the Company consist of unbilled amounts typically resulting from sales under long-term contracts when revenue recognized exceeds the amount billed to the customer. The current portion of contract assets is included in Trade receivables and other assets in the Statement of financial position. The non-current portion of contract assets is included accordingly in the non-current section of the Statement of financial position - Trade receivables and other assets. Contract liabilities consist of advance payments and billings in excess of costs incurred and deferred revenue. The current portion of contract liabilities is included in Trade payables and other liabilities in the Statement of financial position - Other liabilities is included accordingly in the non-current section of the Statement of financial position - Other liabilities.

In thousands of denars	31.12.2021	31.12.2020
Contract assets – current	187,850	192,862
Contract assets – non current	80,818	79,418
Contract liabilities - current	(283,669)	(238,600)
Contract liabilities – non current	(7)	(66)
Net contract assets (liabilities)	(15,008)	33,614
Revenue recognized in the reporting period from amounts included in		
contract liability at the beginning of the period	167,174	176,358

Impairment losses recognized on contract assets are disclosed together with trade receivables in note 7 and they amounted to MKD 101,936 thousand as at 31 December 2021 (2020 MKD: 101,674 thousand).

As of 31 December, 2021, the aggregate amount of the transaction price allocated to the remaining performance obligation is MKD 3,631,096 thousand (2020: MKD 3,634,915 thousand) and the Company will recognize this revenue as services are rendered, which is expected to occur over the next 29 months (2020: 29 months).

The Company did not account for revenue recognized in the reporting period from performance obligations satisfied (or partially satisfied) in previous periods.

19. PERSONNEL EXPENSES

In thousands of denars	2021	2020
Salaries	611,200	638,855
Contributions on salaries	223,775	229,951
Other staff costs	124,672	136,468
Bonus payments	111,361	111,704
Capitalized personnel costs	(49,816)	(69,468)
	1,021,192	1,047,510

Other staff costs include termination benefits, holiday's allowance and other benefits for employees and managers who have left the Company in amount MKD 77,119 thousand for 42 persons (2020: MKD 76,164 thousand for 50 persons). Out of total amount MKD 74,672 thousand (2020: 76,164 thousand) was paid out, while MKD 2,447 thousand (2020: 0 thousand) were presented as Other liabilities as of 31 December 2021. (see note 13).

Bonus payments also include the cost for long-term incentive programs (see note 31).

20. OTHER OPERATING EXPENSES

In thousands of denars	2021	2020
Purchase cost of goods sold	1,888,922	2,258,245
Materials and maintenance	629,794	577,484
Services	563,231	589,807
Services from subcontractors	341,667	315,065
Fees, levies and local taxes	252,145	272,849
Energy	212,702	217,765
Marketing and donations	173,197	184,303
Royalty payments	87,463	82,401
Legal costs	29,325	4,077
Write down of inventories	25,894	27,053
Insurance	12,635	12,146
Consultancy	10,944	12,581
Write down/(release) of inventories to net realizable value	3,741	(15,525)
Other	24,299	11,601
	4,255,959	4,549,852

Services mainly include agent commissions, postal expenses, services for support of IT application and systems, security, cleaning, and utilities.

Purchase cost of goods sold include costs for sold equipment in fixed and mobile operations and as well as equipment sold in SI/IT projects. Corresponding revenue is presented in note 18.

In order to maintain consistency with the current year presentation the Bank charges and other commissions, presented in 2020 as Finance expenses in the amount of MKD 7,882 thousand were reclassified to Services in these financial statements. The reclassification had no impact on equity or net profit.

21. OTHER OPERATING INCOME

In thousands of denars	2021	2020
Net gain on sale of PPE Other	3,521 20,166	6,332 33,237
	23,687	39,569

In the category Other, amounts mainly relates to reinvoicing of different operating expenses.

22. FINANCE EXPENSES

In thousands of denars	2021	2020
Interest from liabilities for TV content right	24,861	31,228
Interest from lease liabilities	19,394	21,034
Other	13,594	9,779
	57,849	62,041

Interest expense from liabilities for TV content right represents the unwinding of the discount related to the carrying amount of long-term payables from the content right contracts capitalized, recognized initially at the net present value of future payments and subsequently measured at amortized cost using the effective interest method. Interest expense from leases are coming from leases in relation to the Lease labilities recognized (see note 14). Other category represents mainly interest related to provisions (see note 16).

23. FINANCE INCOME

In thousands of denars	2021	2020
Fair value through profit and loss Dividend income Interest income	74,040 9,833 3,430	9,295 9,015 179,586
Net foreign exchange gain	2,994	25,149
	90,297	223,045

Interest income in the amount of MKD 176,974 was recognized in 2020 from the release of provision of interest related to one legal case for which second-instance court reached a Decision in favor of the Company. The ruling in the legal case was final as at 31 December 2020. However, the representative of the plaintiff took the opportunity for the submission of an extraordinary legal remedy – revision of the case to the Supreme Court, and based on this submission, on 3 February 2022 the Company received a decision from the Supreme Court that it has accepted it and returned the case to the second-instance court for an additional review based on given instructions. Based on the conditions and circumstances the Management believe that the outcome of this legal case will not turnout negative and the probability of losing the case has been assessed to be below 50%, due to which no provision is required and recognized in the current financial year.

The other amount of Interest income is mainly generated from financial assets classified as Financial assets measured at an amortized cost. Dividend income arises from financial asset at fair value through profit and loss.

24. INCOME TAX EXPENSE

Recognized in the statement of comprehensive income:

In thousands of denars	2021	2020
Current tax expense Current year	205,029	203,543
Deferred tax expense Origination and reversal of temporary differences Total income tax in the statement of comprehensive income	(32,726)	(25,265)

Temporary differences arise in relation to the recognized different tax assets/liabilities (see note 15).

Reconciliation of effective tax rate:

In thousands of denars		2021		2020
Profit before tax	_	1,763,596	-	1,781,449
Income tax	10.00%	176,359	10.00%	178,145
Non-deductible expenses	3.51%	61,880	2.96%	52,810
Tax credit from reinvested Profit	(1.96%)	(34,547)	(1.86%)	(33,210)
Tax credit in the future periods from				
depreciation	(1.03%)	(18,205)	(0.64%)	(11,444)
Tax credit from depreciation	(0.45%)	(7,896)	(0.15%)	(2,598)
Tax credit from donations in sport	(0.24%)	(4,305)	(0.25%)	(4,505)
Tax exempt revenues	(0.06%)	(983)	(0.05%)	(920)
	9.77%	172,303	10.01%	178,278

Tax credit from reinvested profit, are credit used due to reinvested net profit generated as per the Financial Statements of the Company in accordance with the adopted international financial reporting standards published in the "Official Gazette of the Republic of North Macedonia", for investments in qualified tangible and intangible assets in accordance with Income tax law.

25. DIVIDENDS

The Shareholders' Assembly of the Company, at its meeting, held on 17 June 2021 adopted a Resolution for the dividend payment for the year 2020. The Resolution on dividend payment for 2020 is in the gross amount of MKD 1,381,898 thousand from the net profit generated as per the Financial Statements of the Company for the year 2020 in accordance with the adopted international financial reporting standards published in the "Official Gazette of the Republic of North Macedonia". Gross amount of dividend per share for 2020 is MKD 16.02. The dividend was paid out in September 2021. Up to date of issuing of these financial statements, no dividends have been declared for 2021.

On the same meeting Shareholders' Assembly of the Company brought decision part of the net profit generated as per the Financial Statements of the Company for the year 2020 in accordance with the adopted international financial reporting standards published in the "Official Gazette of the Republic of North Macedonia" to be transferred in retained earnings for investments in qualified tangible and intangible assets (in accordance with Income tax law) in amount of MKD 345,475 thousand.

26. REPORTABLE SEGMENTS AND INFORMATION

26.1. Reportable segments

The Company's reportable segments are: business, residential, wholesale segments and other.

Residential segment is consisted of consumer subscribers who are directly owned human subscribers without business subscribers (i.e. self-employed individuals or legal entities offering chargeable products and/or services to customers, non-profit organizations and public organizations). Business segment is consisted of business subscribers which are all directly owned human subscribers who are either self-employed individuals or employees of a legal entity that offers chargeable products and/or services to customers. Employees or members of non-profit and public organizations are also business subscribers. Wholesale comprises all services with telecommunication carriers for both mobile and fixed line, i.e. carrier services, mobile VNO and visitors.

26.2. Information regularly provided to the chief operating decision maker

The following tables present the segment information by reportable segment regularly provided to the Chief operating decision maker of the Company. The information regularly provided to the MC (Management Committee) includes several measures of profit which are considered for the purposes of assessing performance and allocating resources. Management believes that direct margin which is defined as revenues less direct costs less Impairment losses on trade and other receivables is the segment measure that is most consistent with the measurement principles used in measuring the corresponding amounts in these financial statements. Another important KPI monitored at Company level is EBITDA adjusted for the impact of certain items considered as "special influence". These items vary year-over-year in nature and magnitude.

Revenues

In thousands of denars	2021	2020
Residential segment revenues Business segment revenues Wholesale segment revenues Other segment revenues	7,453,220 2,772,411 1,012,971 35,477 11,274,079	7,275,390 2,997,161 833,401 <u>34,453</u> 11,140,405

None of the Company's external customers represent a significant source of revenue.

Segment results	(Direct margin)
obginontrobuito	Diroot marging

In thousands of denars	2021	2020
Direct margin		
Residential segment	5,226,705	5,034,503
Business segment	1,778,166	1,797,286
Wholesale segment	633,673	488,681
Other	827	33,445
Total direct margin	7,639,371	7,353,915
Total Indirect costs	(2,892,588)	(2,928,136)
	(2,002,000)	(2,020,100)
Other operating income	23,687	39,569
EBITDA	4,770,470	4,465,348
Depreciation and amortization	(3,039,322)	(2,844,903)
Total operating profit	1,731,148	1,620,445
Finance income – net	32,448	161,004
Profit before tax	1,763,596	1,781,449
Income tax expense	(172,303)	(178,278)
Net profit for the year	1,591,293	1,603,171
Net profit for the year	1,391,295	1,003,171

27. LEASES AND OTHER COMMITMENTS

27.1. Operating lease commitments - where the Company is the lessor

Operating lease commitments, concluded on temporary basis, where the Company is the lessor are mainly from lease of land sites for base stations.

The future aggregate minimum lease receivables under non-cancellable operating leases are as follows:

In thousands of denars	2021	2020
Not later than 1 year	27,960	26,764
Later than 1 year and not later than 5 years	26,242	40,298
Later than 5 years		

Property, plant and equipment subject to operating leases are as follows:

In thousands of denars	Buildings	equipment	Total
At 31 December 2019			
Cost	29,542	104,896	134,438
Accumulated depreciation	(19,882)	(94,190)	(114,072)
Carrying amount	9,660	10,706	20,366
Carrying amount at 1 January 2020	9,660	10,706	20,366
Investments	78	121	199
Additions	7,632	4,002	11,634
Disposals	(3,959)	-	(3,959)
Depreciation charge	(357)	(4,869)	(5,226)
Carrying amount 31 December 2020	13,054	9,960	23,014
At 31 December 2020			
Cost	33,293	109,019	142,312
Accumulated depreciation	(20,239)	(99,059)	(119,298)
Carrying amount	13,054	9,960	23,014

		Telecommunication	
In thousands of denars	Buildings	equipment	Total
At 31 December 2020			
Cost	33,293	109,020	142,313
Accumulated depreciation	(20,239)	(99,060)	(119,299)
Carrying amount	13,054	9,960	23,014
Carrying amount at 1 January 2021	13,054	9,960	23,014
Additions	20,613	7,523	28,136
Disposals	(6,952)	(1,274)	(8,226)
Depreciation charge	(13,729)	(7,446)	(21,175)
Carrying amount 31 December 2021	12,986	8,763	21,749
At 31 December 2021			
Cost	46,954	115,269	162,223
Accumulated depreciation	(33,968)	(106,506)	(140,474)
Carrying amount	12,986	8,763	21,749

27.2. Capital commitments

The amount for capital expenditure (external commitments) as at 31 December 2021 was MKD 932,586 thousand (2020: MKD 429,832 thousand). The amount for capital expenditure as at 31 December 2021 and 2020 mainly relates to telecommunication assets.

28. ADDITIONAL DISCLOSURES ON FINANCIAL ASSETS

28.1. Financial assets - Carrying amounts and fair values

The table below shows the categorization of financial assets as at 31 December 2020.

Assets		Financial assets		
In thousands of denars	Measured at	At fair value through profit		
	amortized cost	and loss (Level 1)	Carrying amount	Fair value
Cash and cash equivalents	1,635,743	-	1,635,743	1,635,743
Deposits with banks	494,112	-	494,112	494,112
Trade receivables and other assets	3,443,374	-	3,443,374	3,443,374
Financial assets at fair value through profit				
and loss	-	140,881	140,881	140,881
The table below shows the categorization of	inancial assets as	at 31 December 2021.		
Assets		Financial assets		
In thousands of denars	Measured at	At fair value through profit		
	amortized cost	and loss (Level 1)	Carrying amount	Fair value
Cash and cash equivalents	1,291,406	-	1,291,406	1,291,406
Deposits with banks	677,897	-	677,897	677,897
Trade receivables and other assets	3,327,763	-	3,327,763	3,327,763
Financial assets at fair value through profit				
and loss	-	214,920	214,920	214,920

Cash and cash equivalents, deposits, trade receivables and other current financial assets mainly have short times to maturity. For this reason, their carrying amounts at the end of the reporting period approximate their fair values.

Financial assets at fair value through profit or loss are investment in equity instruments, measured at fair value.

Financial assets at fair value through profit or loss include investments in equity instruments in the amount of MKD 214,920 thousand (2020: MKD 140,881 thousand) calculated with reference to the Macedonian Stock Exchange quoted bid prices. Changes in fair values of other financial assets at fair value through profit or loss are recorded in finance income/expenses in the profit or loss (see note 23). The cost of these equity investments is MKD 31,786 thousand (2020: MKD 31,786 thousand).

28.2. Offsetting financial assets and financial liabilities

For the financial assets and liabilities subject to enforceable netting arrangements, each agreement between the Company and the counterparty (typically roaming and interconnect partners) allows for net settlement of the relevant trade receivable and payable when both elect to settle on a net basis. In the absence of such an election, the trade receivables and payables will be settled on a gross basis, however, each party to the netting agreement will have the option to settle all such amounts on a net basis in the event of default of the other party.

The following trade receivables and trade payables (presented in the notes 7 and 13) are subject to offsetting agreements, and are presented after netting in the statements of financial position as at 31 December 2021:

In thousands of denars	Trade and other receivables	Trade payables
Gross amounts of recognized financial instruments	3,532,267	3,141,320
Gross amounts of financial instruments set off	(204,504)	(204,504)
Net amounts of recognized financial instruments	3,327,763	2,936,816

The following trade receivables and trade payables (presented in the notes 7 and 13) are subject to offsetting agreements, and are presented after netting in the statements of financial position as at 31 December 2020:

In thousands of denars	Trade and other receivables	Trade payables
Gross amounts of recognized financial instruments	3,597,351	3,529,321
Gross amounts of financial instruments set off	(153,977)	(153,977)
Net amounts of recognized financial instruments	3,443,374	3,375,344

28.3. Other disclosures about financial instruments

There were no financial assets or liabilities, which were reclassified into another financial instrument category.

No financial assets were transferred in such a way that part or all of the financial assets did not qualify for de-recognition.

29. CONTINGENCIES

The Company has contingent liabilities in respect of the legal and regulatory claims arising from the ordinary course of business and the outcome of which often cannot be reliably anticipated. The major part of the contingent liabilities relates to two legal cases. The first one, with claimed amount of MKD 240 million, related to damage compensation against the Company for an alleged abuse of the dominant position in terms of access to data transfer networks. Based on legal advice and strong legal arguments presented in the court procedure, the management believes that it is not probable that this court procedure will result in a liability of the claimed size. The second case, relates to court ruling by the Supreme Court that returned the case in front of a second-instance court. According to this, an old legal case has been reopened related to a payment order based on an issued invoice for the additional payment of radiofrequency fees for the year 2005 with a claimed amount of MKD 89 million plus default interest. Based on the conditions and circumstances the Management believe that the outcome of this legal case will not turnout negative and the probability of losing the case has been assessed to be below 50%, due to which no provision is required and recognized in the current financial year. Accordingly, no provision was made as of 31 December 2021 and 2020. At the moment, the Management, does not anticipate any material liabilities arising from the contingent liabilities other than those provided for (see note 16).

30. RELATED PARTY TRANSACTIONS

All transactions with related parties arise in the normal course of business and their value is not materially different from prevailing market terms and conditions.

The Government of the Republic of North Macedonia has 34.81% ownership in the Company (see note 17). Government-related entities disclosure exemption applies (IAS 24.25), considering that the Government of the Republic of North Macedonia has significant influence over the entity. Apart from payment of taxes, fees to Regulatory authorities according to local legislation and dividends (see note 25), in 2021 and 2020, the Company did not execute transactions with the Government of Republic of North Macedonia, or any companies controlled or significantly influenced by it, that were outside normal day-to-day business operations of the Company. In tender procedure in 2021, new license in 2100 MHz (2x15 MHz) was issued to the Company in amount of MKD 185 million. License validity is until end of 2028. The license is recognized as intangible assets (see note 12).

Transactions with related parties mainly include provision and supply of telecommunication services, services for support and maintenance and cross charges. The amounts receivable and payable are disclosed in the appropriate notes (see note 7 and 13).

The revenues and expenses with the Company's related parties are as follows:

In thousands of denars	2021		2020	
	Revenues	Expenses	Revenues	Expenses
Controlling owner				
Magyar Telekom Plc	125	16,193	54	18,032
Subsidiaries of the controlling owner	9,678	3,879	12,434	3,553
Ultimate parent company Deutsche Telekom AG	432,409	278,877	334,072	179,089
Subsidiaries of the ultimate parent company	46,099	37,107	17,657	42,362

The receivables and payables with the Company's related parties are as follows:

In thousands of denars	2021		2020	
	Receivables	Payables	Receivables	Payables
Controlling owner				
Magyar Telekom Plc	5,230	3,015	5,451	11,716
Subsidiaries of the controlling owner	2,233	961	8,900	4,833
Ultimate parent company				
Deutsche Telekom AG	132,023	310,194	130,243	390,621
Subsidiaries of the ultimate parent company	42,108	77,518	34,182	78,764

31. KEY MANAGEMENT COMPENSATION

The compensation of the key management of the Company, including taxation charges and contributions, is presented below:

In thousands of denars	2021	2020
Short-term employee benefits (including taxation)	74,482	72,234
Contributions to the state pension system on short-term employee		
benefits	11,501	10,948
Other state contributions on short-term employee benefits	4,458	4,996
Termination benefits	5,160	-
Long-term incentive programs	35,806	27,222
Other payments	2,045	2,097
	133,452	117,497

The remuneration of the members of the Company's Board of Directors and its committees, which amounted to MKD 8,680 thousand (2020: MKD 8,655 thousand) is included in Short-term employee benefits. These are included in Personnel expenses (see note 19).

In 2015 a new performance-based long-term-incentive (LTI) program was launched as part of the global DT Group-wide compensation tool for the companies. The program is a cash settled share-based program. Executives receive virtual shares depending on their individual performance. The number of virtual shares at the end of the term is determined by the target achievement of KPIs. The value and quantity of shares fluctuates during the term of the plan on the basis of two indicators: development of the DT share price and target achievement in connection with 4 company targets: (adjusted earnings per share (EPS); adjusted return on capital employed (ROCE); customer satisfaction and employee satisfaction). The target achievement is measured at the end of each annual cycle and the number of virtual shares determined on this basis is fixed as the result of

the annual cycle (non-forfeitable). At the end of the plan's term, the results from the four annual cycles are totaled and paid out in cash. Each year a new cycle of long-term-incentive (LTI) program is launched.

Additionally, as a part of the adopted Lead to Win programme, DT Group-wide Virtual Share Matching Plan (VSMP) was adopted with aim to lead the executives to manage and control the company with entrepreneurial spirit in accordance with the defined corporate strategy. It is separate from the Deutsche Telekom Group's Share Matching Plan, yet within the framework of the local legal regulations in the Republic of North Macedonia and it adheres to the same principles.

The eligible executives have a possibility to participate in the Plan by allocating part of their Short-Term Incentive in the amount from 10% to 33%. This amount is converted into a number of virtual DT shares (original virtual shares) for calculation purposes. The final amount of the incentive payable to the executives depends on the value of the DT shares at the end of the Plan. The executives are entitled to a cash equivalent for the so-called virtual matching shares, which are additional virtual free-of-charge shares based on their Performance dialog rating, as well as to a cash equivalent in the amount of the dividends payments, calculated on the original virtual shares. The Company's VSMP is designed as a four years' cash plan intended for the executives of the Company, which uses virtual shares of DT for the purposes of calculation only.

The VSMP was introduced for 2016 and 2017. The 2016 VSMP also includes a possibility for the executives to voluntary participate in the Substitute for 2015 VSMP, with the aim to fully implement alternative solution for the Company as in the other companies within the DT Group. The VSMP is introduced also for the year 2018, 2019 and 2020, but there was no interest from the executives to voluntary participates in the program. In 2021 final payment for VSMP 2017 was executed, by which the program is closed.

In 2019 a new long-term incentive program called Repetitive performance incentive (RPI) was introduced by DT Group, which honors repeated, extraordinary collective performance, which is measured by the overachievement of a defined bonus KPI. The RPI is a four-year plan, running for period 2018 to 2021. The first year is only considered as the year of eligibility of the respective company, if there is a target achievement in two consecutive years as defined in the policy. The bonus will be paid out to entitled executives from the second year onwards in case the defined program requirements are met. The group-wide relevant bonus KPI is EBITDA unadjusted of the respective segment/company. The threshold for bonus eligibility/payment starts with 115% target achievement, including the costs for the RPI bonus payments. Chief Executive Officer and the Chief Officers participate in the program. The amount of the bonus payout depends on Management level, target achievement of the Company and the number of years of consecutive over-performance.

The expenses incurred by the Company related to the programs described above are shown within Long-term incentive programs (see note 16 and 19).

32. EARNINGS PER SHARE

a) Basic and diluted earnings per share

	2021	2020
Basic and diluted earnings per share (in denars)	18.45	18.59
b) Weighted average number of common stocks outstanding as the denomina	ator	
	2021	2020
Weighted average number of common stocks outstanding as the denominator for calculation basic and diluted earnings per share	86,254,903	86,254,903

33. EVENTS AFTER THE FINANCIAL STATEMENT DATE

There are no events after 31 December 2021 that would have impact on the 2021 profit or loss, statement of financial position or cash flows.

Social responsibility is an important part of the Strategy and the Company as part of DT Group is taking part of the Environmental, Social, and (Corporate) Governance (ESG) Agenda through different initiatives for impact on climate changes and better resource efficiency.

34. REGULATORY ENVIRONMENT

34.1. Regulatory Environment - Mobile Line

On 5 September 2008 the Agency for Electronic Communications (hereinafter referred to as "the Agency"), ex officio, issued a notification to the Company for those public electronic communication networks and/or services which have been allocated thereto under the Concession Contracts. The license for radiofrequencies used by the Company in the GSM 900 band was also issued in a form regulated in the ECL with a validity period until 5 September 2018, and in 2018 it was renewed for additional 10 years until 2028. Due to the changes in the bylaws, the 900 MHz band is opened for UMTS technology and at the request of the Company, the radiofrequency license is changed so that these frequencies are now technology neutral.

In 2008 a decision for granting 2x15 MHz radiofrequencies license on 2100 MHz was announced. The validity of the license was 10 years, i.e. until 17 December 2018. The license was renewed in 2018 for 10 years, until 2028, in accordance with the ECL.

An auction procedure concluded in August 2013 awarded the whole 790 – 862 MHz band together with the unassigned spectrum in the 1740–1880 MHz band for Long Term Evolution (LTE) technology in a public tender. Each of the 3 mobile operators, at that time, obtained an LTE radiofrequency license of 1x10 MHz in the 800 MHz band and 2x15 MHz in the 1800 MHz band. Each license was acquired for a one-off fee of EUR 10.3 million. The license is for 20 years, until 1 December 2033, with renewal option for additional 20 years, in accordance with the ECL.

After the merger of One and VIP, on 18 November 2016, A1 Macedonia (former one.VIP) submitted a request to the Agency to change the licenses for using radio frequencies in land mobile service with record numbers 108269/1, 108271/1, 104068, 104069, 104711, 108269/2 and 108267/2. The Agency adopted a resolution not to approve the reshuffling request of A1 Macedonia.

In tender procedure, new license in 2100 MHz (2x15 MHz) was issued to the Company. New license in 2100 MHz (2x10 MHz) was issued also to A1 Macedonia. License validity is until end of 2028.

On 19 December 2014, amendments of the ECL were enacted. Many significant changes were made to the ECL, with the Balkan Roaming Regulation being one of the most important changes made in line with EU Roaming III regulation. The glide path for roaming prices reduction finished on 1 July 2017. In 2019, regulatory bodies of the West Balkan countries (WB6) (North Macedonia, Montenegro, Serbia, Bosnia, Albania, Kosovo) introduced a roaming regulation, starting with RLAH+ (Roam Like At Home) surcharge model from 1 July 2019 until 30 June 2021. From 1 July 2021, the RLAH- model regulation shall be in place. With this regulation, the international termination rates between the WB6 countries were also decreased.

Both mobile operators on the market, the Company and A1 Macedonia are designated as operators with a Significant Market Power (SMP) status on the relevant wholesale market "Access and call origination on public mobile networks". The Agency imposed the same regulatory remedies for both operators:

- mobile access obligation for all Mobile Virtual Network Operators (MVNO) hybrid types (including Reseller),
- cost based price for Full MVNO,
- retail minus (-35%) for the Reseller,
- obligation for access to Multimedia Messaging Service (MMS) services and mobile data based on technology neutrality.

An MVNO, Lyca Mobile hosted on the A1 Macedonia network entered the Macedonian market and started retail operations in July 2016 under regulated wholesale conditions. Also, from October 2020, new MVNO (Green Mobile) started operating, hosted on A1 Macedonia network.

The cable operator Telekabel, which on the market is already present by offering fixed services (voice, broadband and TV), as of January 2019 started operating as an MVNO hosted on Company's mobile network under regulated wholesale conditions.

Both operators, the Company and A1 Macedonia are designated as operators with an SMP status on the relevant wholesale market "Wholesale call termination on public mobile networks". The current termination rates are symmetrical for the Company and A1 Macedonia, but as of May 2018, Lyca Mobile has high asymmetry. With the new analysis of the relevant market in 2020 symmetry was implemented also for Lyca Mobile from 1 July.2020.

The license duration of the two licences previously owned by A1 Macedonia was until 2017, 10 MHz from 900 MHz band and 10 MHz from 1800 MHz band expired on 23 March 2017, positioned in the lower parts of the bands. At the request of A1

Macedonia for licence renewal, the Agency adopted resolution No. 0804-974 dated 2 November 2016 not to renew these two licences. At the moment these radiofrequencies are not allocated and they are not available for sale, they are saved for a third entrant.

On 26 May 2017, A1 Macedonia submitted a request to the Agency to change the licence for using radio frequencies in land mobile service with registered number 108267/2, whereby the following radiofrequency block was allocated: 1770-1785/1865-1880 MHz. On 9 October 2017, the Agency issued a resolution for rejecting the A1 Macedonia's request for reshuffling on 1800 MHz.

Based on the appeal submitted by A1 Macedonia, in September 2019 the reshuffling request on 1800 MHz was finally approved by the Agency, due to a court decision in favour of A1 Macedonia. In the 1800 MHz range A1 Macedonia will get huge continuous block of 35 MHz effective as of 15 October 2019. Based on the Company's request, the Agency prolonged the licenses on 900 (2x12.5MHz), 1800 (2x10MHz) and 2100 (2x15MHz) for additional validity of 10 years (until 2028-2029) without onetime fee.

In April 2019, the Ministry of Information Society and Administration issued the National Broadband Strategy which sets the following targets:

- By the end of 2023 at least one major city should be covered with 5G signal;
- By the end of 2025 the regional highways and state highways defined by the Agency should be covered by a continuous 5G signal;
- By the end of 2027 all urban areas will be covered by a continuous 5G signal;
- By the end of 2029, everyone will have access to 5G internet with a minimum internet speed 100 Mbps;
- By the end of 2029, at least 50% of the total number of subscribers contracts of households across the whole country should have internet access of at least 100 Mbps;
- By the end of 2029 all households will have affordable access to a network that provides download speeds of at least 100 Mbps with the possibility of upgrading to gigabit speed;
- By the end of 2029, all public institutions (schools, universities, research centres and other educational institutions, health institutions, ministries, courts, local governments and other public authorities and bodies), should have symmetric access to the Internet of at least 1Gb/s.

Based on public debate at the beginning of 2021 the Agency adopted changes in the Rulebook on Radiofrequencies fees:

- Decrease of RF fees from 3.x GHz for 50% (from 4,000 EUR/MHz to 2,000 EUR/MHz)
- Decrease of RF fees for 700 MHz for 50 % (from 11,480 EUR/MHz to 5,740 EUR/MHz)
- Decrease of RF fees above 55 GHz (E band RF links) for 50% (from 4,000 EUR/250 MHz to 2,000 EUR/250 MHz)

5G public tender is expected to be published by the Agency in March 2022 for the following radiofrequency bands 700 MHz, 3.X GHz. Finalization of the procedure could be expected in second or third guarter of 2022.

34.2. Regulatory Environment - Fixed Line

The Company has SMP obligations in several regulated markets for fixed services.

At the beginning of 2015, the regulation for access to fibre was implemented, with Local Bitstream Access over next-generation access (NGA) on level 3 and 4 and VULA (Virtual Unbundled Local Access) regulation on level 2. The introduction of new technologies (Very high-speed digital subscriber line (VDSL) Vectoring technology in 2017) announced by the Company for the retail customers led to the introduction of new wholesale access products and reshaping of the regulatory obligations.

The final document for the wholesale central access for mass-market products provided at a fixed location market analyses (Market 6) was published in April 2017. For the first time, the Agency imposed a regulation on the access to Hybrid Fibre Coaxial Access (HFC). All existing obligations for the copper and fibre network remain unchanged. All obligations apply to the Company and to the A1 Macedonia operator as SMPs on the broadband market.

The amendments from September 2016, with a new obligation to register the new and existing electronic networks (ATLAS), refer to the joint building and use of networks and a new obligation for the Agency to publish the received reports on the optic backbone segment measurements by all operators.

The tender for a USO (Universal service obligation) provider was published in October 2021, for period 2022 to 2026, and one of the main criteria is refund amount from the regulator that the tendering party is requesting.

According to the results from the tender, the Company is a universal service provider until 2026 for Fixed access and access for disabled users (voice and Internet of minimum 12Mbit/s download).

A1 Macedonia was designated for Public payphones. R3 Infomedia signed a contract with the Agency for the Telephone Directory and Directory Inquiry universal services.

Following the market trends and the EU regulation, the Agency made decisions for deregulation on several markets: trunk segment of leased lines and avoiding regulation of the Ethernet leased line services; minimal set of leased lines (retail); WLR (Wholesale Line Rental) market; traditional retail fixed voice services (access and traffic). The Company has a cost-based price obligation for the regulated wholesale services, using Long Run Incremental Costs methodology (LRIC).

In the middle of 2019, the Agency implemented Economic Replicability Test (ERT) testing (margin squeeze methodology) to NGA based broadband wholesale services supplied by the two dominant operators (the Company and A1 Macedonia). The developed ERT model will test the economic replicability of the retail bundles including broadband services with access speed higher than 30 Mb/s.

35. INVESTIGATION INTO CERTAIN CONSULTANCY CONTRACTS

On 13 February 2006, Magyar Telekom Plc., the controlling owner of the Company, (via Stonebridge Communications AD -Skopje, majority shareholder of the Company), announced that it was investigating certain contracts entered into by another subsidiary of Magyar Telekom Plc. to determine whether the contracts were entered into in violation of Magyar Telekom Plc. policy or applicable law or regulation. Magyar Telekom's Audit Committee retained White & Case, as its independent legal counsel to conduct the internal investigation. Subsequent to this, on 19 February 2007, the Board of Directors of the Company, based on the recommendation of the Audit Committee of the Company and the Audit Committee of Magyar Telekom Plc., adopted a resolution to conduct an independent internal investigation regarding certain contracts in Republic of North Macedonia.

Based on publicly available information, as well as information obtained from Magyar Telekom and as previously disclosed, Magyar Telekom's Audit Committee conducted an internal investigation regarding certain contracts relating to the activities of Magyar Telekom and/or its affiliates in Montenegro and Republic of North Macedonia that totaled more than EUR 31 million. In particular, the internal investigation examined whether Magyar Telekom and/or its Montenegrin and Macedonian affiliates had made payments prohibited by U.S. laws or regulations, including the U.S. Foreign Corrupt Practices Act (the "FCPA"). The Company has previously disclosed the results of the internal investigation.

Magyar Telekom's Audit Committee informed the U.S. Department of Justice (the "DOJ") and the U.S. Securities and Exchange Commission (the "SEC") of the internal investigation. The DOJ and the SEC commenced investigations into the activities that were the subject of the internal investigation. On 29 December 2011, Magyar Telekom announced that it had entered into final settlements with the DOJ and the SEC to resolve the DOJ's and the SEC's investigations relating to Magyar Telekom. The settlements concluded the DOJ's and the SEC's investigations. Magyar Telekom disclosed the key terms of the settlements with the DOJ and the SEC on 29 December 2011. In particular, Magyar Telekom disclosed that it had entered into a two-year deferred prosecution agreement (the "DPA") with the DOJ. The DPA expired on 5 January 2014, and further to the DOJ's request filed in accordance with the DPA, the U.S. District Court for the Eastern District of Virginia dismissed the charges against Magyar Telekom on 5 February 2014.

In relation to the local investigation by the state authorities in Republic of North Macedonia and further to the previously disclosed information in the Financial Statements of the Company for the preceding years, the criminal procedure against former managers of the company is still ongoing at first instance criminal court.

We have not become aware of any information as a result of a request from any regulators or other external parties, other than the previously disclosed, from which we would have concluded that the financial statements may be misstated, including from the effects of a possible illegal act.