



RULEBOOK

On the manner of accounting separation application and reliability review of public postal operator's regulatory reports

I. INTRODUCTORY PROVISIONS

Article 1

This Rulebook shall regulate accounting separation methodology and review of public postal operator (hereinafter: PPO) regulatory reports, as well as preparation of regulatory reports and other information which the PPO is obliged to provide to the Regulatory agency for electronic communications and postal services (hereinafter: Agency).

Article 2

This rulebook contains:

- 1) objectives of applying the accounting separation cost principle and the PPO regulatory reports review;
- 2) accounting separation principles;
- 3) definition of key terms used in this rulebook;
- 4) principles, models and basic methodology of cost calculation, including cost type segmentation, cost centers segmentation, internal transfers, etc.;
- 5) cost allocation from cost centers to postal service phases and from postal service phases to final cost objects as well as revenue allocation;
- 6) forms for unit cost calculation per service and targeted revenue calculation per service;
- 7) principles and rules for cost of capital calculation per service and suggested sales prices, as well as
- 8) material and formal contents, manner and deadline for submitting official and internal regulatory financial reports to the Agency by the PPO.

1. Rulebook objectives

Article 3

The objectives of this Rulebook are to provide through the application thereof, for the purpose of the Agency and the operator, the following:

- 1) appropriate accounting information basis for planning and monitoring of the activities oriented towards creating and maintaining the relations in the market for postal services pursuant to the relevant regulations;
- 2) correct, transparent and reliable information on costs, revenues, profits (or losses) and assets (capital employed) per all groups of services and per each service of the PPO, as basis of determining of universal postal service price level according to “costs plus” method including costs of all services related to universal postal service increased by the corresponding return on capital engaged in the provision of these services;
- 3) basis for universal postal service price level determination with need to protect the interests of service users respecting the basic principle of universal postal service as well as other market players;
- 4) prevention of the PPO’s dominant position on the postal market in the form of price subsidies between the PPO’s services entrusted to the PPO and the services open to competition, as well as
- 5) forming an appropriate internal accounting system, but also appropriate analytic aspects (asset and liabilities account separation i.e. capital employed) in Financial Accounting, as well as the obligation of the system compliance in line with the Agency and its availability to the Agency.

2. Accounting separation principles

Article 4.

Application of cost principles and accounting separation per PPO’s postal services groups providing more types of services shall be based on the following principles:

- 1) ***completeness principle***, which means that all information related to realized revenues, costs and assets are relevant and complete and meet the criteria of regulatory reporting;
- 2) ***causation principle***, which refers to precise allocation of costs to the cost objects i.e. PPO’s postal services that incurred them, both directly (part of costs directly incurred during provision of specific service, directly allocated costs) and indirectly per activity or group of activities (indirect production costs), or per principle “cost to cost” (for indirect production costs, central indirect costs) as well as reallocation of direct internal transfers between cost centers;
- 3) ***objectivity principle***, which refers to allocation of the PPO’s cost to postal services based on analysis of cost cause, i.e. resource engagement which initiates costs in a way that avoids unjustified bias of the PPO or any other market player, which would disrupt the principle of free market competition in accordance with the Law on postal services in the Republic of Serbia (hereinafter: the Law). If any assumptions are made within regulatory reports, those assumptions must be

justified, supported and corroborated by relevant empirical data. Assumptions cannot be formulated in a way that creates an unfair bias towards any business segment or service;

- 4) ***correlation principle***, which refers to mutually comparable parameters, revenues generated from the postal services' sales and associated costs, which arise as a result of the PPO's resources engagement or during the provision of postal services, in the same period;
- 5) ***transparency principle***, which refers to clearly documented processes and procedures and the PPO's periodic reporting to the Agency on the results of cost and assets allocation model, and identification of revenues and service volume measurements;
- 6) ***consistency principle***, which refers to cost allocation in line with the goals set by the Agency (economic efficiency, fairness of distribution and similar), i.e. that fulfills the legal obligation (respecting the interests of users, guaranteeing the performance of universal postal service, guaranteeing the prescribed quality level of universal postal service, etc.). This principle is applied during the preparation of regulatory reports and refers to the consistent application of accounting standards and principles, which are used in the preparation of financial (statutory) reports;
- 7) ***correctness principle***, which means that regulatory reports must not contain material mistakes;
- 8) ***comparability principle***, which refers to time-consistent application of the prescribed costing procedures, ensures inter-period comparability of data and creates conditions for providing reliable conclusions, with possibility for costing system improvement according to the established procedure. All changes in regulatory reports must be explained and referenced in line with the principles of regulatory reporting. If changes are above materiality level, regulatory reports for previous years should be amended;
- 9) ***flexibility principle***, which guarantees possibility of adjusting documented methodology of the PPO, i.e. Description on implementation of calculation and allocation system in accordance with all PPO's changes which are relevant for cost calculation;
- 10) ***reliability (verifiability) principle***, which refers to the Agency review of the relevant and reliable documentation as well as information base which the PPO uses for cost allocation based on which it is possible to determine cost allocation process compliance with this rulebook;
- 11) ***confidentiality principle***, which refers to the Agency obligation to use the information obtained through the reports on costs, revenues, realized results and capital employed for the purpose of reporting to authorized institution, in accordance with the Law;
- 12) ***co-operation principle***, which refers to complete trust, openness and cooperation between the PPO and the Agency in the implementation of cost allocation procedure i.e. cost-accounting principle as well as the PPO's separate balance sheets and income statement accounts per each service.

3. Definitions

Article 5.

Definitions given herein shall have the following meaning:

- 1) **Postal service unit price calculation** is part of the PPO internal accounting system which is used to analyze costs, revenues and results per each service with main objective to calculate targeted revenue as well as to provide reliable data for defining selling price of each service related to universal postal service, cost control and accounting separation per type of service;
- 2) **FDC – Fully Distributed Costs** is a costing method requiring all company costs within the accounting period to be allocated for calculation of the unit price which in direct or indirect way arise as consequence of provision of specific service;
- 3) **ABC – Activity Based Costing** is a methodology of cost calculation based on cost allocation based on activities realized during the specific service provision;
- 4) **HCA – Historical Cost Accounting** is an accounting system which uses, throughout the accounting phases, company's actual costs within the accounting period;
- 5) **Cost object** represents the PPO's individual postal services to which costs are allocated through each of the identified phases of postal service. These are individual postal services of the PPO, to which costs are allocated through each of the identified phases of the provision of the postal service, as its constituent elements;
- 6) **Phases** are more complex and contain activities which are realized during the postal service provision. Postal process is going through phases: collection, sorting, transport and delivery/payment;
- 7) **Activities** are lowest parts of one technological process and are part of the postal service phases.
- 8) **Cost drivers** are parameters which describe relationship between realized costs and specific activity or service. There are two groups of drivers: Resource Drivers – correlation between cost centers and activities and Activity Drivers – correlation of activities and services as final cost objects;
- 9) **Cost centers (CC)** are parts of the PPO organization where costs are recorded in the internal accounting. Every organizational unit of the PPO represents a cost center, but with possibility to represent one organizational unit as few separate cost centers. Costs recorded to the cost centers are the subject of allocation either directly to services or to activities and services afterwards. Main separation of cost centers is to production and non-production cost centers;

- 10) **Postal network units (PNU)** represent cost center category where the core services are provided. Costs recorded in these cost centers are subject to allocation based on ABC methodology;
- 11) **Net present value** is difference between purchasing value of asset and calculated accumulated depreciation;
- 12) **Accounting separation implementation document** (hereinafter: Implementation document) is a written document which the PPO delivers to the Agency as appendix to the accounting separation model and suggestion of postal selling prices, i.e. calculation of targeted revenue per each service;
- 13) **Cost accounting** represent identification, definition, measurement, reporting and analysis of different elements of direct and indirect costs related to provision and selling of services;
- 14) **EPMU – *Equi-Proportional Mark-Up*** represents a method of allocating costs which implies that common costs are allocated to services proportionally to the costs that are already allocated to those services. For each service, a percentage share in total costs is calculated so the common costs are distributed to the service in the same percentage, i.e. “cost to cost”, i.e. “previously allocated costs”;
- 15) **Primary costs** are costs prescribed by the rulebook governing the Chart of Accounts for companies, cooperatives and entrepreneurs, in accordance with the law governing accounting, and the Chart of Accounts based on it;
- 16) **Homogeneous cost category** in terms of this rulebook is a group of costs that has a single cost driver and a single price movement.

II. ACCOUNTING SEPARATION METHODOLOGY

1. Principles, models and basis of cost calculation methodology

Article 6.

When applying the cost accounting model, i.e. valuing assets in the cost model, the method historical (actual) costs (HCA - Historical Cost Accounting) should be applied.

The historical cost accounting model is based on the PPO's actual costs for assets recorded at purchasing value, considering the depreciation of assets, where the cost or price of assets is not adjusted for changes in the market and changes caused by inflation.

Article 7.

The basis for calculating costs according to the HCA model, which is required for the PPO to apply, is according to the "top-down" method, according to the cost allocation model based on historical (actual) financial data for the year of reporting.

Article 8.

Method of cost calculation which should be applied by the PPO is FDC – fully distributed costs, i.e. calculation of costs with the objective to determine unit price which includes all costs that are, directly or indirectly, incurred during the provision of specific service.

Article 9.

Cost allocation of all services per each phase and per each postal service is based on cost accounting principles. Allocation of all costs should be based on postulates of Activity Based Costing methodology.

ABC-Activity Based Costing is a method which determines the cause-and-effect relationship between the costs incurred and the services provided by the PPO. In this way, the cause of the cost is monitored and allocated based on activities which occur during the provision of specific service, for those that cannot be directly allocated.

Article 10.

Cost principle allocation based on the HCA model implies:

- 1) Appropriate segmentation of the cost types in the PPO's internal accounting with the aim to determine which costs are not subject to allocation and which costs have to be allocated;

- 2) Appropriate segmentation of cost centers with the objective to identify cost centers whose costs are not subject of allocation and which have to be allocated;
- 3) Identification of postal service phases/activities;
- 4) Identification of the PPO internal transfers as part of total costs and revenues calculation;
- 5) Internal cost allocation of postal services from cost centers to identified activities;
- 6) Internal cost allocation of activities to each postal service;
- 7) Separation of revenues per each postal service;
- 8) Calculation of unit costs (unit price) of each postal service;
- 9) Calculation of weighted average cost of capital (WACC).

Article 11.

PPO applies HCA FAC model based on ABC methodology.

Grouping of costs for allocation purposes is done based on cost represented at the cost center level, i.e. on postal network unit given that these cost centers are directly involved in the process of providing postal service. For all other cost centers, which directly or indirectly participate in the provision of the postal service, the classification of costs on postal network unit level will be applied, where the following groups of costs are distinguished:

1) production costs:

- (1) employee costs;
- (2) depreciation;
- (3) facility costs;
- (4) equipment costs;
- (5) vehicle costs, and
- (6) other production costs.

2) non-production costs:

- (1) financial expenses (group 56 account);
- (2) other expenses (group 57 account);
- (3) impairment losses on assets (group 58 account), and
- (4) discontinued operation losses (group 59 account).

Article 12.

The basic principles of cost grouping are:

- 1) quality of allocation;

- 2) feasibility of allocation;
- 3) significance of costs, and
- 4) the possibility of identifying allocation parameters.

Article 13.

ABC (Activity Based Costing) method of cost calculation is based on direct and indirect cost allocation and is based on activities which are incurred during the provision of a specific service.

For the application of the mentioned method, it is necessary that the costs are allocated by activities within the phases of performing the postal service, as well as to the final cost bearers. The activity that is part of the technological process of performing the postal service is linked to the final service directly or with the help of cost drivers. Cost driver is a criterion used for the allocation of indirect costs to cost bearers, services and is defined in a way that describes the cause-and-effect relations of resource consumption through the technological process of providing postal services.

2. Cost segmentation, activity segmentation and cost allocation phases

Article 14.

Costs are grouped into those that are subject to allocation and costs that are not included in the allocation and are not the subject of this rulebook.

The costs that are allocated refer to the costs incurred during the provision of the PPO's core business.

Costs that are not subject to allocation represent those incurred during the financial year, but cannot be related to the core business or their exact amount cannot be confirmed through the statutory audit process (for example the cost of the leased property, costs associated with loans given to employees, litigation costs; the cost of assets over which the PPO has no control or management capacity, as well as the cost of assets that were not the subject of the inventory).

Allocated costs can be:

1) direct costs - those that are generated in the postal service technological process or in a part of the technological process, and are directly allocated to activities, parts of the postal service process or to the PPO's final postal service. These costs are incurred at cost centers (organizational units) whose activities directly participate in the provision of one or more different services. Costs recognized as direct postal service costs are allocated to cost objects based on ABC (Activity Based Costing) methodology;

2) indirect costs - cost center' (organizational units) costs that cannot be directly attributed to the activity, part of postal service technological or to the final cost object, the

PPO's postal service, but can be attributed to a particular service based on justifiable reason and a clear relationship where these can be established in several steps. These costs can be:

(1) common costs - those that arise during the provision of services and cannot be attributed to one service, because they are not directly affected by the following allocation possibilities:

- allocation through the nature of the cost, in which the first step is an analysis of the nature of the cost within the PPO's business. Dependent on the nature of the cost, the allocation steps and the cost driver are further defined, based on a clearly justified reason and a clear relationship with the postal service activities, or
- allocation through a general allocator, if there is no possibility of allocation by the nature of the cost, for this purpose the general allocator EPMU (Equi-Proportional Mark-Up) is used, or "equally proportional allowance";

(2) joint costs - are a separate group of common costs, which can be linked to one or more groups of services, so that costs are common to that group of services and cannot be attributed to one service in the group, being independent of other groups of services. These costs by their nature represent a common cost and their allocation is made in accordance with the principle of allocation of common costs for a particular group of services. The distribution of joint costs is performed using two parameters:

- quantity / volume / turnover of each service, and
- relative consumption for each service according to the ABC (Activity Based Costing) method.

Article 15.

Depending on the mode of occurrence, segmentation of activities is carried out by grouping them into the following types:

- 1) postal (operational) activities represent activities that are only related to the provision of postal services (within the phases: collection, sorting, transport and delivery/payment);
- 2) support activities for postal services are activities that are not directly linked to the provision of postal services and that do not occur within the phases: collection, sorting, transport and delivery/payment, but are necessary for the PPO to successfully provide postal services (e.g. costs of sales, logistics costs, etc.);
- 3) other activities are activities that are not pertinent to the postal activity (costs of finance, administration costs and others), and
- 4) non-allocated activities are activities that are not included in the calculation.

Article 16.

Cost allocation is defined through the following phases:

- 1) allocation of cost type to cost center;
- 2) allocation of cost centers to phases and activities;
- 3) phase allocation to cost objects.

During the preparation of regulatory reports, it is necessary to group costs into homogeneous cost categories. Capital or operating costs that have different cost drivers or different price movements cannot be classified in the same homogeneous category.

In order to adequately allocate costs at each level of allocation, it is necessary to analyze the nature of each homogeneous cost category and define whether the cost is direct, indirect, common or joint, or whether it can be allocated directly or indirectly using a cost driver.

3. Cost account segmentation

Article 17.

The costs that are not directly allocated to the service are allocated by the PPO to:

- 1) Production costs, which incurred during the performance of operational activities and may be:
 - (1) employee costs, which are recorded at production and non-production cost centers, and include Group 52 accounts, as well as all costs related to employees;
 - (2) depreciation and capital cost, which are grouped and defined according to the assets to which they relate and are allocated in the same way;
 - (3) facilities costs that are recorded at production and non-production cost centers and include accounts on which costs incurred as a result of using facilities (regular and investment maintenance, materials for facility maintenance, storage and insurance of facilities, etc.);
 - (4) equipment costs, which are recorded at production and non-production cost centers and include accounts on which costs incurred as a result of using the equipment are recorded (used material and spare parts for regular or investment maintenance, regular and investment maintenance costs, etc.);
 - (5) vehicle costs that are recorded at production and non-production cost centers and include accounts on which costs incurred as a result of the use of vehicles (fuel costs, registration, maintenance, tolls, insurance, related taxes, etc.), and
 - (6) other production costs, which are recorded at production and non-production cost centers and include accounts belonging to different classes (50, 51, 52, 53 and 55), which are not assigned to any of the above groups.
- 2) Non-production costs, which are not included in the calculation of the unit cost price, and consist of:

- (1) financial expenses (group 56 account);
- (2) other expenses (group 57 account);
- (3) impairment losses on assets (group 58 account), and
- (4) discontinued operation losses (group 59 account).

Revenues corresponding to costs that are excluded from the calculation of the cost price are also not included in the calculation.

Article 18.

The PPO is obliged to submit to the Agency a list of cost accounts grouped by categories prescribed in Art. 14-17 of this Rulebook, on the forms given in the Annex to this Rulebook, no later than within 30 days from the day this Rulebook enters into force.

4. Cost center segmentation

Article 19.

The PPO's cost centers are organizational units or sub-units to which costs are recorded in internal accounting.

According to the processes performed at each of the cost centers, the following are identified:

- 1) Postal activity cost centers which include production cost centers and non-production cost centers which are serving postal activity;
- 2) other cost centers that include production cost centers active in other PPO's activities non-production cost centers of a general nature that provide support to all production units, both those from the core segment and from the non-core segment.

Production cost centers in terms of location and role are:

- 1) Production cost centers, whose costs relate to postal services, which are the subject of allocation;
- 2) production cost centers active in other PPO's activities, which are not subject to allocation.

Non-production cost centers in terms of location and role are:

- 1) non-production cost centers of a specific character, the costs of which are entirely the subject of allocation in the case of their exclusive functional orientation toward the postal activity of the PPO, respecting the principle of causality;
- 2) non-production cost centers, the costs of which are partly subject to allocation.

Article 20.

The PPO is obliged to submit to the Agency a list of cost centers grouped by categories prescribed in Article 19 of this Rulebook, on the forms from the Annex of this Rulebook within 30 days from the day this Rulebook enters into force.

5. Allocation of cost types to cost centers

Article 21.

During the first level of allocation, when costs are already allocated to cost types, it is defined whether the cost is incurred during the provision of postal services, i.e. whether it is incurred during the provision of services or the cost is incurred in a different way.

6. Allocation from cost centers to phases and activities

Article 22.

Internal allocation from the cost centers to the identified phases and activities of postal service is in line with principles of: causality, objectivity, correlation and feasibility, as follows:

1) for employee costs, per employee, for each phase and activity in proportion to the amount of work performed by an employee;

2) for the allocation of the net present value of fixed assets and depreciation costs, their structure is determined according to the groups of assets (facilities, equipment, vehicles and other);

3) for facility costs, the cost structure is determined based on the data from the fixed assets register, the homogeneous cost categories are formed, after which the costs are assigned to phases, i.e. activities that belong to one of the four identified phases of postal service, based on the purpose of the facility;

4) for equipment costs, the structure of actual costs is determined on the basis of data from the register of fixed assets, and then assigned to phases, i.e. activities, which belong to one of the four identified phases of postal service provision, based on the purpose of equipment;

5) for vehicle costs, the allocation is performed based on the data on the annual use of an individual vehicle, which includes identifying the number and structure of vehicles according to their purpose;

6) for other production costs, the allocation is performed according to the types of services, i.e. activities, which belong to one of the four phases of the provision of postal services;

7) for non-production costs, based on previously allocated production costs, i.e. the Equi-Proportional Mark-Up (EPMU) method, and

8) for indirect production costs, applying the principle of full allocated costs, based on the method of "equally proportional allowance" (EPMU - Equi-Proportional Mark-Up), i.e. "Cost-to-cost", i.e. "according to previously allocated costs".

7. Phase allocation to cost bearers

Article 23.

Internal allocation of costs from phases to cost objects - single postal service, is in respect to the following principles: causality, objectivity, correlation and feasibility of allocation, as follows:

- 1) for the costs of the "collection" phase, based on the structure of postal services, i.e. the distribution of different types of postal services in accordance with the selected allocation key;
- 2) for the costs of the "sorting" phase, based on the structure of postal services, i.e. the distribution of different types of postal services in accordance with the selected allocation key;
- 3) for the costs of the "transport" phase, based on the structure of all transported postal items, i.e. the distribution of different types of postal services in accordance with the selected allocation key, and
- 4) 3) for the costs of the "delivery / payment" phase, based on the structure of postal services, i.e. the distribution of different types of postal services in accordance with the selected allocation key.

8. Revenue allocation

Article 24.

PPO revenues are broken down by groups and types of revenues, in a way that business, financial and other revenues can be distinguished from one another.

Within operating revenues, the PPO keeps separate records of postal service revenues from the revenues generated from the provision of other types of services.

Within the postal service revenue, internal accounting system must provide accurate data on revenue by individual service, clearly distinguishing the reserved postal services from the non-reserved postal services that are in the domain of universal postal service.

If no data that displays the direct connection of revenue with an individual postal service are available, the PPO may apply the appropriate revenue allocation keys, which allocate the revenue shown at the group level of the postal service to the single postal service. In this case, the PPO is obliged to explain and document the assumption within the Description of implementation, which is submitted along with the costs calculation.

9. Internal transfers

Article 25.

In accordance with the principle of causality of used resources between organizational units where internal transfers occur, there are two recognized groups of internal transfers:

1) internal transfers that represent a cost, and arise from the provision of services between different organizational units of the PPO, which directly or indirectly participate in the execution of the postal service and

2) internal transfers that represent income and arise from the provision of services between different organizational units of the PPO, which directly or indirectly participate in the execution of the postal service.

In the case referred to in paragraph 1 of this Article, costs as well as revenues shall be calculated on the basis of credible documents of organizational units, actual prices, i.e. actual costs.

Article 26.

The PPO is obliged to submit to the Agency the detailed information on the manner of defining internal transfers in accordance with Forms 3a and 3b from the Annex to this Rulebook, which constitute its integral part, and within the deadlines prescribed by this Rulebook.

Article 27.

The PPO is obliged to prepare and document cost calculations, within the deadlines prescribed by this Rulebook, for each individual postal service in order to provide a transparent basis for potential changes in prices of services in the domain of universal postal service, i.e. providing the evidence of an objective basis for change in pricing policy without disturbing competition in the market.

Article 28.

The unit cost price calculation for each postal service should be based on the real costs of the PPO, which are presented:

- 1) by groups of primary costs, in the manner regulated by the Rulebook that defines the Chart of Accounts and the content of accounts in the Chart of Accounts for companies, cooperatives and entrepreneurs or in more detail by the Chart of Accounts of the PPO in the part that covers primary costs (Class 5);
- 2) as a part of the total primary costs of the PPO, which refer only to the postal service, i.e. one segment of the PPO's business, respecting the principle of causality for a part of the costs, which cannot be directly allocated to the final cost objects.

10. Capital costs calculation and selling price per postal service proposal development

Article 29.

Sales prices of the PPO postal services are formed by applying the cost principle, which is based on the method of total allocated costs and the approach of calculating costs by activities in accordance with this Rulebook, taking into account postage rate, i.e. the development of the selling price of universal postal service, which must be:

- 1) equal for all users in the entire territory where the universal postal service provider provides the service;
- 2) affordable, based on real costs and which give incentive for efficient provision of the universal postal service;
- 3) free for secograms that are used by the blind and partially sighted persons;
- 4) transparent;
- 5) non-discriminatory and determined in such way that it doesn't give individual users an advantage over other users under the same or similar conditions.

Article 30.

The application of the cost principle in the development of the selling price for a postal service according to the model of historical (actual) cost accounting is based on the actual costs of individual postal service incurred in business, by adding to the actual unit costs the corresponding weighted average cost of capital, that is calculated in a reasonable manner.

The formation of the postal services selling price is carried out on the basis of the target income of the individual postal services referred to in paragraph 1 of this Article, which is calculated according to the following formula:

$$R = O + Am + K * WACC$$

in which the symbols have the following meaning:

R – target revenue;

O – operating cost (excluding depreciation costs);

Am – depreciation;

K – engaged capital;

WACC – rate of return on capital employed, i.e. weighted average cost of capital;

where K – engaged capital is calculated according to the following formula:

$$K = (HCB_T + HCB_{T-1})/2 + (HOK_T + HOK_{T-1})/2$$

in which the symbols have the following meaning:

HCB_T, HCB_{T-1} – net present value of assets at the end of the reporting year (t) and at the beginning of the reporting year (T-1);

HOK – net working capital, i.e. the difference between current assets and current liabilities;

HOK_T, HOK_{T-1} – net working capital at the end of the reporting year (t) and at beginning of the reporting year (T-1).

Article 31.

The rate of return on assets (capital) employed represents the weighted average cost of capital of the PPO that is calculated according to the following formula:

$$WACC = \frac{Re}{1 - T} \times \frac{E}{(D + E)} + Rd \times \frac{D}{(D + E)}$$

in which the symbols have the following meaning:

Re - cost of equity;

Rd - cost of debt;

D - the total amount of equity and debt;

E - value of equity;

T - corporate income tax rate.

The cost of equity encompasses the target rate of return on risk-free investments and an adequate rate based on business and financial risks of the company.

The cost of debt is calculated by comparing the effective net financial expenses, i.e. financial expenses of the company reduced by financial income, with the total liabilities of the company.

The rate of return on capital employed, i.e. the WACC is determined by the Agency that may hire an external consultant for the calculation.

Article 32.

The associated cost of capital for each individual postal service is calculated by applying the weighted average price (cost rate) of capital referred to in Article 31 of this Rulebook, to the total fixed assets (capital) engaged in the provision of these services.

The property referred to in paragraph 1 of this Article consists of:

- 1) fixed assets without long-term financial investments, i.e. related intangible investments, real estate, plant and equipment at net value (gross value less cumulative depreciation, i.e. value adjustments) until the end of the reporting period;
- 2) current assets without short-term financial investments, reduced by short-term liabilities.

In accordance with the requirement of special account management for the universal postal service, as if it were provided by special legal entities, the engaged property from

paragraph 1 and 2 of this Article, is calculated and indicated in reports on all types of activities of the PPO:

- 1) as direct property engaged in performing the stated activities,
- 2) as indirect assets allocated to the above activities using predetermined cost drivers.

III. REGULATORY REPORTING OF THE AGENCY BY THE PPO

Article 33.

Reporting on the application of the cost principle and the results of the accounting separation of the Agency by the PPO is performed through the regulatory reports set out in this Rulebook and the forms provided in the Annex, which are printed with this Rulebook and form an integral part thereof:

- 1) Table 1 – PPO Cost accounts segmentation for the period from ____ to ____ 20__;
- 2) Table 2 – PPO Cost center segmentation with associated costs for the period from ____ to ____ 20__;
- 3) Table 3a - Internal transfer of PPO income for the period from ____ to ____ 20__;
- 4) Table 3b - Internal transfer of PPO costs for the period from ____ to ____ 20__;
- 5) Table 4 - Production CC: Allocation of actual direct costs and cost center costs to PPO phases for the period from ____ to ____ 20__;
- 6) Table 5 - Non- production CC: allocation of actual direct costs and cost center costs to PPO phases for the period from ____ to ____ 20__;
- 7) Table 6 - Allocation of phase costs to postal services of PPO for the period from ____ to ____ 20__;
- 8) Table 7 - Total income of postal services of PPO for the period from ____ to ____ 20__;
- 9) Table 8 - Total balance of postal services for the period from ____ to ____ 20__;
- 10) Table 9 - Balance of individual postal services for the period from ____ to ____ 20__;
- 11) Table 10 - Calculation of the cost of debt rate for the period from ____ to ____ 20__;
- 12) Table 11 - Calculation of the rate of return on capital employed (investment basis) for the application of weighted average cost of capital (WACC) on date ____ 20__;
- 13) Table 12 - Calculation of the target revenue of postal services, and
- 14) Table 13 – Reconciliation of the statutory income statement with regulatory reports.

In addition to the forms referred to in paragraph 1 of this Article, the PPO is obliged to submit the following reports to the Agency for the purpose of regulatory reporting: report

on the volume of the services provided, report on the proposed selling prices of postal services, implementation description of accounting separation for the reporting year, independent auditor's report, report on operations, business program for the next year, valid price list of all PPO services with clearly indicated dates of application, in accordance with the defined deadlines for the submission of regulatory reports, as well as other reports requested by the Agency.

Article 34.

The implementation description contains the following items:

- 1) a comprehensive explanation of the basics of the preparation of regulatory reports, including an explanation of the key regulatory accounting policies, as well as:
 - (1) a list of services / organizational units for which the accounting separation has been performed;
 - (2) trends related to the volume and revenue for each service, expected significant changes and how these changes may affect the business environment;
 - (3) a description of the process of the application of accounting separation and preparation of regulatory reports;
 - (4) methods and principles of accounting separation;
 - (5) changes in accounting policies for the reporting year and their impact on the result and comparability with the previous year;
 - (6) changes from the previous period that affect accounting separation;
 - (7) significant adjustments to regulatory reports.
- 2) methodology of the accounting separation application, which includes:
 - (1) a description of the costs that are the subject of the allocation;
 - (2) a description / list of costs that are not subject to allocation;
 - (3) the cost center structure;
 - (4) identified direct as well as indirect costs;
 - (5) detailed information on the cost allocation phases, by cost center, by activity, distinguishing between direct costs, indirect or common costs (according to the nature of costs, joint costs and costs allocated by the general allocator);
 - (6) a description of cost drivers for each allocation phase;
 - (7) a description of the calculation of internal transfers;
 - (8) a description of the process of regulatory financial statements preparation; and
 - (9) a detailed description of how the target revenue of the services was calculated.

Article 35.

The internal financial report on the achieved results of the PPO, i.e. the internal income statement, contains data on:

- 1) the achieved result at the level of each postal service;
- 2) cost structure of each individual postal service, according to the phases of the technological process;
- 3) the achieved business results of all postal services;
- 4) the achieved business result at the level of reserved and non-reserved services within universal postal service;
- 5) calculation of the unit cost price of all postal services, and
- 6) calculation of the target revenue of all postal services.

Article 36.

Regular annual financial statements, Balance sheet, Income statement, Cash Flow statement, Statement of changes in equity, as well as Notes to the financial statements of the PPO are submitted to the Agency, as individual and / or consolidated financial statements, in specified forms, for the determined reporting periods and within the deadlines set for the submission of financial reports to the Serbian Business Registers Agency, which also applies to the audited financial statements.

The deadline for submitting the report referred to in paragraph 1 of this Article to the Agency shall be no later than eight days from the day determined by the regulations governing accounting as the day for submitting the financial reports to the Business Registers Agency for public disclosure.

Article 37.

Internal regulatory financial reporting of the Agency by the PPO, which is based on the Description of Implementation and allocation of costs for the reporting year, is performed in accordance with this Rulebook and is submitted semi-annually (cumulatively from the beginning of the calendar year) and annually by means of reports prescribed by this Rulebook and Forms from the Annex to this Rulebook in accordance with the deadlines defined within this Rulebook.

At the request of the Agency and within the deadline determined by that request, the PPO is obliged to submit other reports in addition to those set in this Rulebook, i.e. change the existing forms from the Annex to this Rulebook.

In order to verify the authenticity of separate accounting, the Agency may hire an independent auditor or consultant, who will verify the internal regulatory reports and accounting separation in accordance with applicable regulations, and the PPO is obliged to provide access and insight into the necessary data and information system.

Article 38.

The PPO is obliged to submit to the Agency no later than June 30 of the current year, for the previous business year, the annual reports referred to in Article 37 of this Rulebook, as well as completed forms from the Annex, in written and electronic form, and semi-annual reports for the current business year are to be submitted by September 30 of that year.

IV. TRANSITIONAL AND FINAL PROVISIONS

Article 39.

Notwithstanding the deadline prescribed by Article 38 of this Rulebook, in 2021 the PPO is obliged to submit to the Agency a Draft Description of Implementation by March 1, 2021, and pilot regulatory reports including forms, final Description of Implementation, and other documentation prescribed by this Rulebook until September 1, 2021.

Article 40.

On the day this Rulebook enters into force, the Ordinance on the methodology of price formation for the universal postal service (Official Gazette of the RS, No. 100/11) shall cease to be valid.

Article 41.

This Rulebook shall enter into force on the eighth day from the day of its publication in the "Official Gazette of the Republic of Serbia".

**President of the
Board of Directors**

Dragan Kovačević

Number:1-04-3400-9/20-2
In Belgrade, 08. October 2020

ANNEX - REGULATORY REPORTING FORMS

Table 1 - PPO Cost accounts segmentation for the period from to 20 .

I Accounts of costs that are not subject to allocation
Acc 1
Acc 2
...
Acc n
II Cost accounts that are the subject of allocation
1.Direct costs
Acc 1
Acc 2
...
Acc n
2. Production costs
2.1. Employee costs
Acc 1
Acc 2
...
Acc n
2.2. Depreciation
Acc 1
Acc 2
...
Acc n
2.3. Facility costs
Acc 1
Acc 2
...
Acc n
2.4. Equipment costs
Acc 1
Acc 2
...
Acc n
2.5. Vehicle costs
Acc 1

Acc 2
...
Acc n
2.6. Other production costs
Acc 1
Acc 2
...
Acc n
3. Non-production costs
Acc 1
Acc 2
...
Acc n

Note:

Data source: internal accounting of the PPO

Table 2 - PPO Cost center segmentation with associated costs for the period from ____ to ____ 20__.

I CCs that are not subject to allocation	Total costs (RSD)	Costs that refer to postal activity (RSD)	Costs related to other activities of PPO (RSD)
CC 1			
CC 2			
...			
CC n			
I T O T A L			
II CCs which are partly subject to allocation	Total costs (RSD)	Costs that refer to postal activity (RSD)	Costs related to other activities of PPO (RSD)
CC 1			
CC 2			
...			
CC n			
II T O T A L			
III CCs which are subject to allocation	Total costs (RSD)	Costs that refer to postal activity (RSD)	Costs related to other activities of PPO (RSD)
CC 1			
CC 2			
...			
CC n			
III T O T A L			
T O T A L (I+II+III)			

Note:

1. Data source: internal accounting of the PPO
2. In shaded fields, the amount of costs = 0.00
3. Internal transfers are not the subject of this table

Table 3a - Internal transfer of PPO income for the period from ____ to ____ 20 ____;

I Universal postal service according to CC of PPO	Unit of measure	Quantity*	Price** (RSD)	Total internal revenue transfer *** (RSD)	CC that provides service ****
Universal postal service 1 CC PPO 1					
Universal postal service 2 CC PPO 1					
....					
Universal postal service n CC PPO 1					
Universal postal service 1 CC PPO 2					
Universal postal service 2 CC PPO 2					
....					
Universal postal service n CC PPO 2					
...					
Universal postal service 1 CC PPO m					
Universal postal service 2 CC PPO m					
....					
Universal postal service n CC PPO m					
I T O T A L					
II Other postal services according to CC PPO	Unit of measure	Quantity*	Price** (RSD)	Total internal revenue transfer *** (RSD)	CC that provides service ****
Other postal service 1 CC PPO 1					
Other postal service 2 CC PPO 1					
...					
Other postal service n CC PPO 1					
Other postal service 1 CC PPO 2					
Other postal service 2 CC PPO 2					
...					
Other postal service n CC PPO 2					
...					
Other postal service 1 CC PPO m					
Other postal service 2 CC PPO m					
...					
Other postal service n CC PPO m					
II T O T A L					
T O T A L					

Note:

1. Data source: internal accounting of the PPO;

2. Price of postal services from the valid price list of the PPO.

* expressed in an adequate unit of measure

** is entered if the prices of the CC service are expressed at the level of an individual service

*** total income from postal service realized for internal needs of the PPO

**** enter the name of the CC with which there is an internal transfer; if one CC has an interaction with several CCs, it is necessary to show each relationship separately in the table

Table 36 - Internal transfer of PPO costs for the period from ____ to ____ 20__

I non-postal service CC postal activities	Total internal cost transfer (RSD)
Non - postal service 1 CC of postal activity 1	
Non - postal service 2 CC of postal activity 1	
....	
Non - postal service n CC of postal activity1	
Non - postal service 1 CC of postal activity 2	
Non - postal service 2 CC of postal activity 2	
....	
Non - postal service n CC of postal activity 2	
...	
Non - postal service 1 CC of postal activity m	
Non - postal service 2 CC of postal activity m	
....	
Non - postal service n CC of postal activity m	
I T O T A L	
II Products / services of CC active in other * activities of PPO	Total internal cost transfer (RSD)
Product / service 1 CC active in other activities PPO 1	
Product / service 2 CC active in other activities PPO 1	
...	
Product / service n CC active in other activities PPO 1	
Product / service 1 CC active in other activities PPO 2	
Product / service 2 CC active in other activities PPO 2	
...	
Product / service n CC active in other activities PPO 2	
...	
Product / Service 1 CC active in other activities PPO m	
Product / Service 2 CC active in other activities PPO m	

...	
Product / service n CC active in other activities PPO m	
I I T O T A L	
T O T A L	

Note:

1. Data source: internal accounting of the PPO;

* non-postal activities

[illegible]

[illegible]

5. Other prod. costs TOTAL																														
5.1. CC costs																														
5.2. Internal transfers																														
6. Non-prod. costs TOTAL																														
6.1. CC costs																														
6.2. Internal transfers																														
II TOTAL																														
I+II TOTAL																														

Note:

1. Data source: internal accounting of the PPO

Column:

1 - X.1 CC costs = costs that are posted directly to CC;

X.2 Internal transfers = internal transfers to CC belonging to a specific cost group;

2 - total booked costs of a certain production CC and group of accounts;

3 - part of the total costs of a certain production CC and group of accounts related to the universal postal service;

8 - part of the total costs of a certain production CC and group of accounts related to other postal services.

At the request of the Agency, the operator shall, if necessary, submit data of a higher level of analytical nature by phases (collection, sorting, transport and delivery/payment) in this report.

[illegible]

[illegible]

TOTAL																											
4.1. CC costs																											
4.2. Internal transfers																											
5. Other prod. costs TOTAL																											
5.1. CC costs																											
5.2. Internal transfers																											
6. Non-prod. costs TOTAL																											
6.1. CC costs																											
6.2. Internal transfers																											
II TOTAL																											
I+II TOTAL																											

Note:

1. Data source: internal accounting of the PPO;

1 - X.1 Costs CC = costs that are posted directly to CC;

X.2 Internal transfers = internal transfers to CC belonging to a specific cost group;

2 - total booked costs of a certain non-productive CC and group of accounts;

3 - part of the total costs of a certain non-productive CC and group of accounts related to the universal postal service;

8 - part of the total costs of a certain non-productive CC and group of accounts related to other postal services.

At the request of the Agency, the operator shall, if necessary, submit data of a higher level of analytical nature by phases (collection, sorting, transport and delivery / payment) in this report.

Table 6 - Allocation of phase costs to postal services of the PPO for the period from ____ to ____20__.

Universal postal service	Direct cost (RSD)	Collection (RSD)			Sorting (RSD)			Transport (RSD)			Delivery / Payment (RSD)			TOTAL (RSD)
<i>1</i>	<i>2</i>	<i>3</i>			<i>4</i>			<i>5</i>			<i>6</i>			<i>7 (2+3+4+5+6)</i>
Activities		Act. 1	...	Act. n	Act. 1	...	Act. n	Act. 1	...	Act. n	Act. 1	...	Act. n	
UPS 1														
UPS 2														
...														
UPS n														
T O T A L														
Other postal services	Direct cost (RSD)	Collection (RSD)			Sorting (RSD)			Transport (RSD)			Delivery / Payment (RSD)			TOTAL (RSD)
<i>1</i>	<i>2</i>	<i>3</i>			<i>4</i>			<i>5</i>			<i>6</i>			<i>7 (2+3+4+5+6)</i>
Activities		Act. 1	...	Act. n	Act. 1	...	Act. n	Act. 1	...	Act. n	Act. 1	...	Act. n	
OPS 1														
OPS 2														
...														
OPS n														
T O T A L														

Note:

The data from Table 4 and Table 5 are entered in this table.

At the request of the Agency, the operator shall, if necessary, submit data of a higher level of analytical nature by phases (collection, sorting, transport and delivery / payment) in this report.

Table 7 - Total income of postal services of the PPO for the period from ____ to ____20__.

Postal service code and name	Directly posted income (RSD) without discount	Directly posted income (RSD) with discount	Accrued income from internal transfers (RSD)	TOTAL INCOME (RSD)
<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>	<i>5</i>
UPS 1				
UPS 2				
...				
UPS n				
T O T A L				
UPS 1				
UPS 2				
...				
UPS n				
T O T A L				

Note:

Columns 2 and 3 - data on the realized income from the internal accounting of the PPO by a specific individual postal service

Column 4 - accrued income for a specific postal service that was realized on the basis of internal realization (Table 3a, point I and point II).

Table 8 - Total balance of postal services for the period from _____ to ____20__.

Service group	Total income (RSD)	Externally realized income	Internally realized income	Total costs (RSD)	Costs based on internal transfers	Other costs	Result (RSD)
<i>1</i>	<i>2 (2a+2b)</i>	<i>2a</i>	<i>2b</i>	<i>3 (3a+3b)</i>	<i>3a</i>	<i>3b</i>	<i>4 (2-3)</i>
Universal postal service							
a) reserved							
b) non-reserved							
Other postal services							

Note:

Column 2 - data from Table 7

Column 3 - data from Tables 5 and 6

Table 9- Balance of individual postal services for the period from ____ to ____20__.

UPS	Total external income (RSD)	Total internal income (RSD)	Total external costs (RSD)	Total internal costs (RSD)	Result (RSD)
<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>	<i>5</i>	<i>6=2+3-4-5</i>
I Reserved UPS (total)					
UPS 1					
UPS 2					
...					
UPS n					
II Non-reserved UPS (total)					
UPS 1					
UPS 2					
...					
UPS n					
Total UPS					
III Other postal services					
OPS 1					
OPS 2					
...					
OPS n					
Total OPS					

Note:

Columns 2 and 3 - data from Table 7

Columns 4 and 5 - data from Table 6

Table 10 - Calculation of the cost of debt rate for the period from ____ to ____20__;

Groups and accounts	E l e m e n t s	Amount in RSD
	I Net financial result of the company (1 to 7)	
	1. Net financial expenses (income) from relations with parent company and dependent legal entities (10-11)	
560	10. Financial expenses from relations with parent and dependent legal entities	
660	11. Financial income from relations with parent and dependent legal entities	
	2. Net financial expenses (income) from relations with other related legal entities (20-21)	
561	20. Financial expenses from relations with other related legal entities	
661	21. Financial income from relations with other related legal entities	
	3. Net interest expenses (income) (30-31)	
562	30. Interest expenses	
662	31. Interest incomes	
	4. Net negative (positive) exchange rate differences (40-41)	
563	40. Negative exchange rate differences	
663	41. Positive exchange rate differences	
	5. Net expenses (income) based on currency clause (50-51)	
564	50. Expenses based on the effects of the currency clause	
664	51. Revenues from the effects of the currency clause	
	6. Net expenses (income) based on participation in the loss (gain) of dependent legal entities and joint ventures (60-61)	
565	60. Expenses from participation in the loss of dependent legal entities and joint ventures	
665	61. Income from participation in the profit of dependent legal entities and joint ventures	
	7. Net other financial expenses (income) (70-71)	

	b. Allocated values LBOS&SC									
46	33. Other liabilities									
	a. Directly assigned OL									
	b. Allocated values OL									
47	34. Value added tax liabilities									
	a. Directly assigned VATL									
	b. Allocated values VATL									
48	35. Liabilities for other taxes, contributions and other duties									
	a. Directly assigned LOTC&OD									
	b. Allocated values LOTC&OD									
49	36. Accrued expenses and deferred revenue									
	a. Directly assigned AE&DR									
	b. Allocated values AE&DR									
III	III Total employed assets-capital (I+II)									

(I + II) Note:

1. The stated positions are entered in this report at their net values, i.e. after deduction for their cumulative depreciation and other write-offs, i.e. value adjustments until the day of the Report.
2. At the request of the Agency, the operator shall, if necessary, submit data of a higher level of analyticalness by positions in this report.
3. The Operator is obliged to consistently apply the criteria for classifying positions into directly allocated and allocated with cost drivers for the latter, about which the Agency submits an appropriate explanation in the form of additional analytical reports for material items and provides the possibility of unimpeded access to business books.

Table 12 - Calculation of the target revenue of postal services

[illegible]

Table 13 – Reconciliation of the statutory income statement with regulatory reports

Group	Position name	Universal postal service		Other postal services		Other company activities	Unallocated	Total
		Reserved postal service	Non-reserved postal service					
	I Business revenue (60 to 65)							
60	Income from sales of goods							
61	Income from sales of products and services							
62	Income from activation of effects and goods							
64	Income from premiums, subsidies, grants, donations, etc.							
65	Other operating income (leases, refunds)							
	II Business expenses (50 to 55)							
50	Cost of goods sold							
51	Cost of materials							
52	Salary costs, salary compensation and other personal expenses							
53	Costs of production services							
540	Depreciation costs							
541 to 549	Provision costs							
55	Intangible costs							
	III Operating profit (loss) I-II							
	IV Net financial income (expenses)							
66	Financial income							
56	Financial expenses							
	V Net other income (expenses)							
67, 68	Other income							
57, 58	Other expenses							

	VI Regular income (loss) III + IV + V							
	VII Net income (loss) of discontinued operations							
69	Income from effects of change in accounting policies and errors from previous periods							
59	Income from effects of change in accounting policies and errors from previous periods							
	VIII Income (loss) before tax							
	IX Income tax							
	X Net income (loss)							

