M E M O R A N D U M

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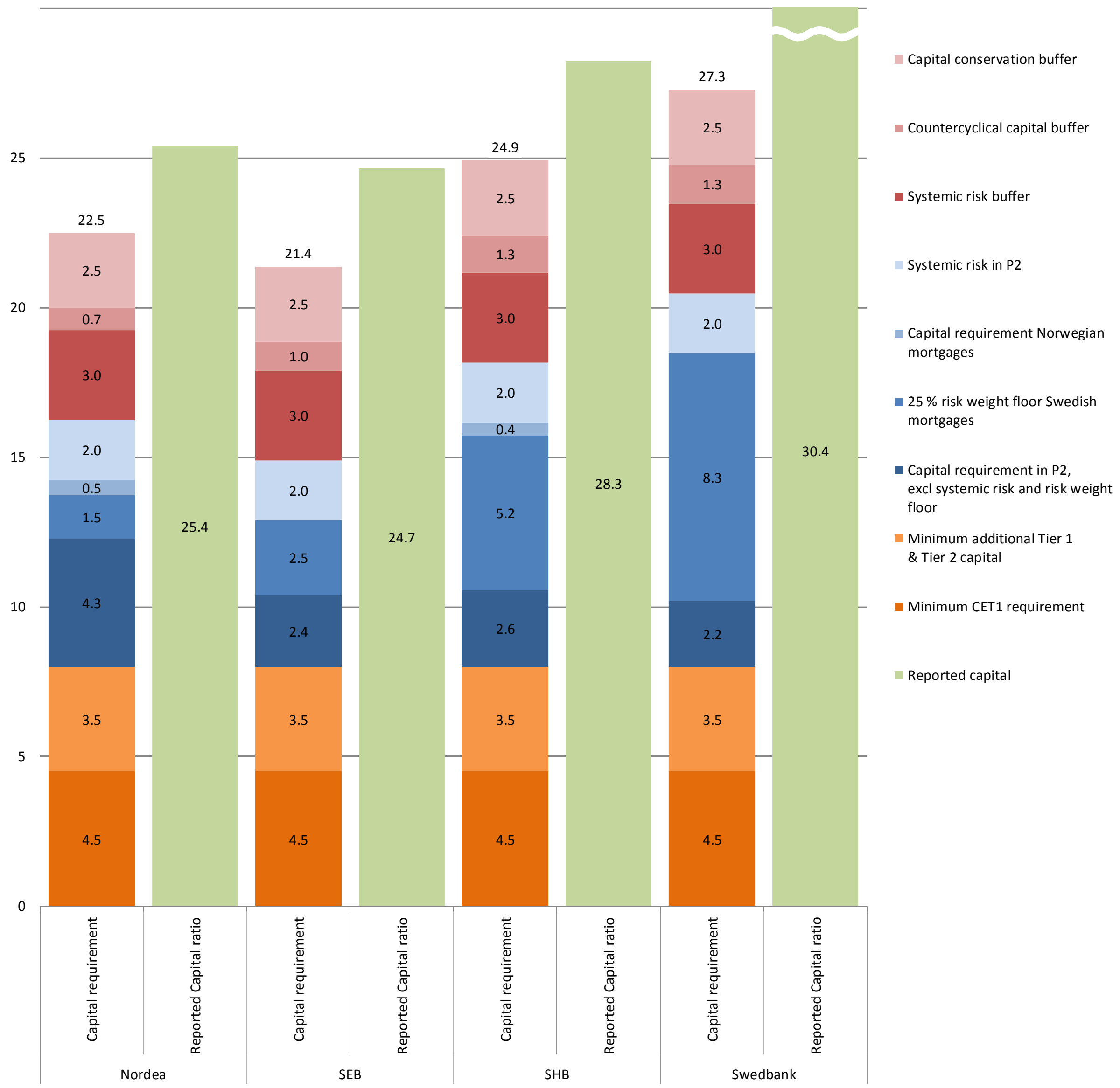
Capital requirements for the Swedish banks, second quarter 2018

Finansinspektionen publishes on a quarterly basis the capital requirements of the largest Swedish banks and credit institutions under its supervision that have been categorised as Categories 1 and 2[1]. This memorandum discloses these firms' capital requirements and capital ratios as at the end of the second quarter of 2018, including the values for the requirements in Pillar 2.[2]

[1]FI categorises all credit institutions under its supervision on an annual basis. This categorisation enables FI to apply the guidelines issued by the European Banking Authority (EBA). Avanza and Nordnet were categorised into Category 2 in 2017, but have been omitted from this memorandum because they were not treated as Category 2 institutions in the 2017 Supervisory Review and Evaluation Process (SREP). A list of the credit institutions' supervision categories is available at the following link: http://www.fi.se/contentassets/967c10f7a3134428bb66c8e89286aed0/osii_kategorisering2017_20160926.pdf

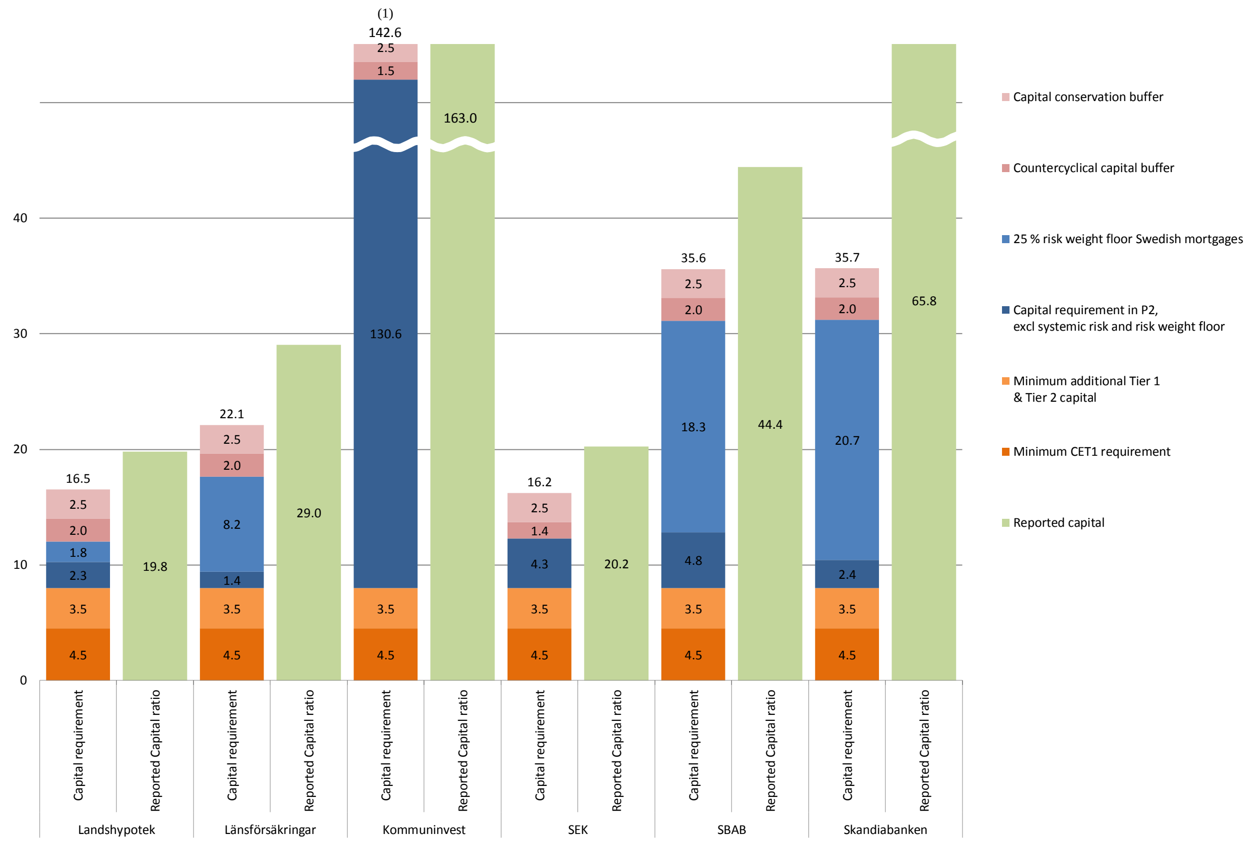
[2] The actual values in Pillar 2 in terms of "Capital requirement in Pillar 2, excl systemic risk and risk weight floor" refers to Finansinspektionen's assessment of the capital requirements in the 2017 SREP.

1 Total capital requirement, four major banks (as percentage of total REA[3])



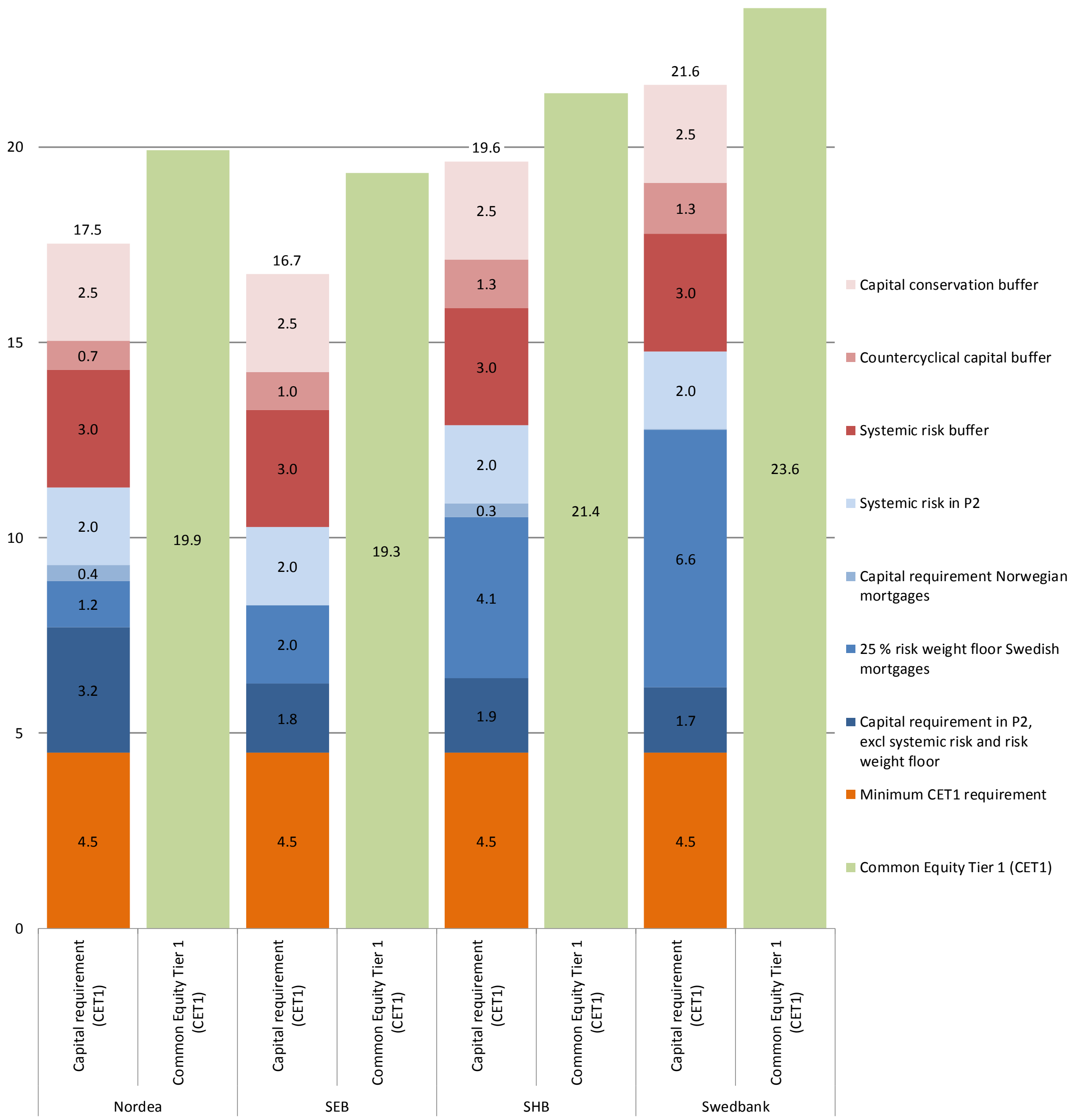
[3] Risk Exposure Amount

2 Total capital requirement, other six firms published in this memorandum (as percentage of total REA)

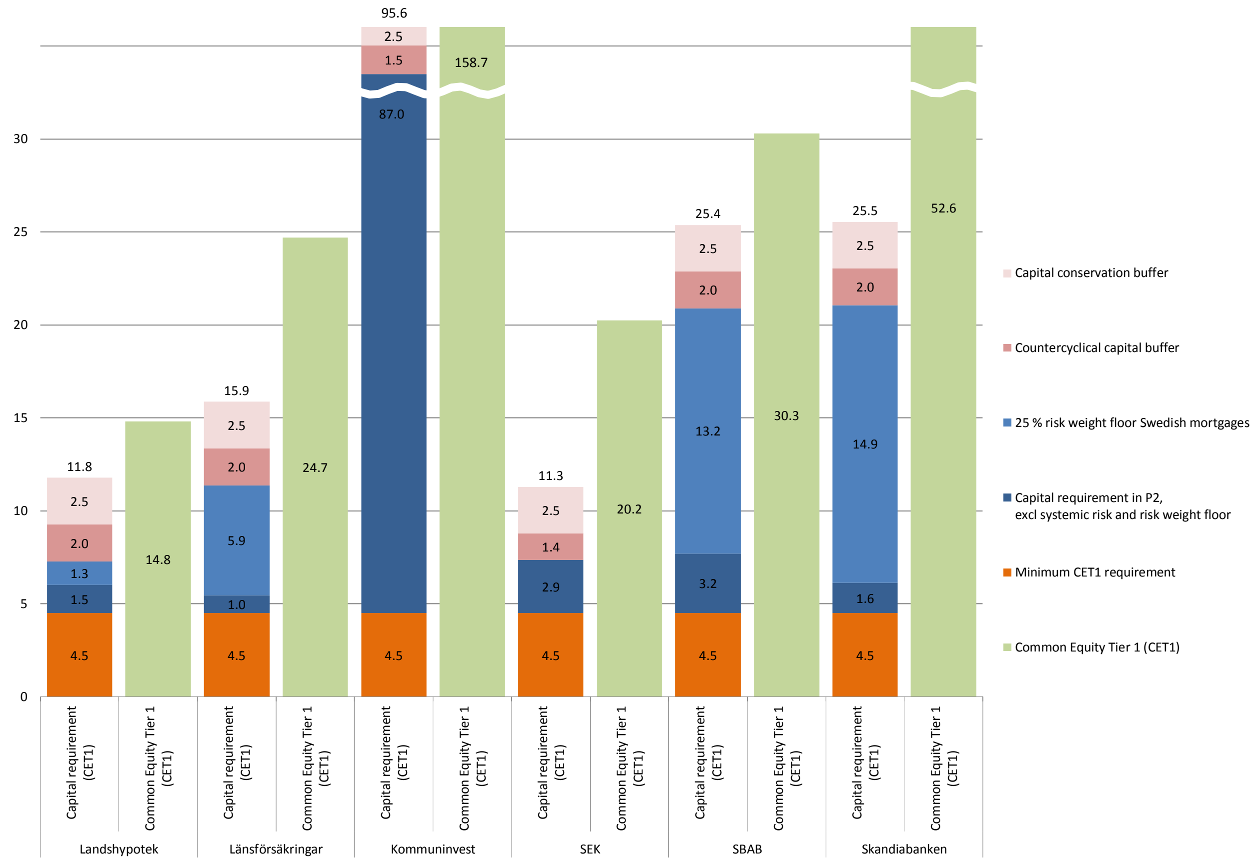


(1) *To cover the risk for excessive leverage, FI has assessed that Kommuninvest needs to have own funds amounting to at least 1.5 per cent of its total leverage ratio exposure. For the purpose of reaching this total own funds requirement, an additional capital charge for the risk of excessive leverage has been added to Pillar 2.*

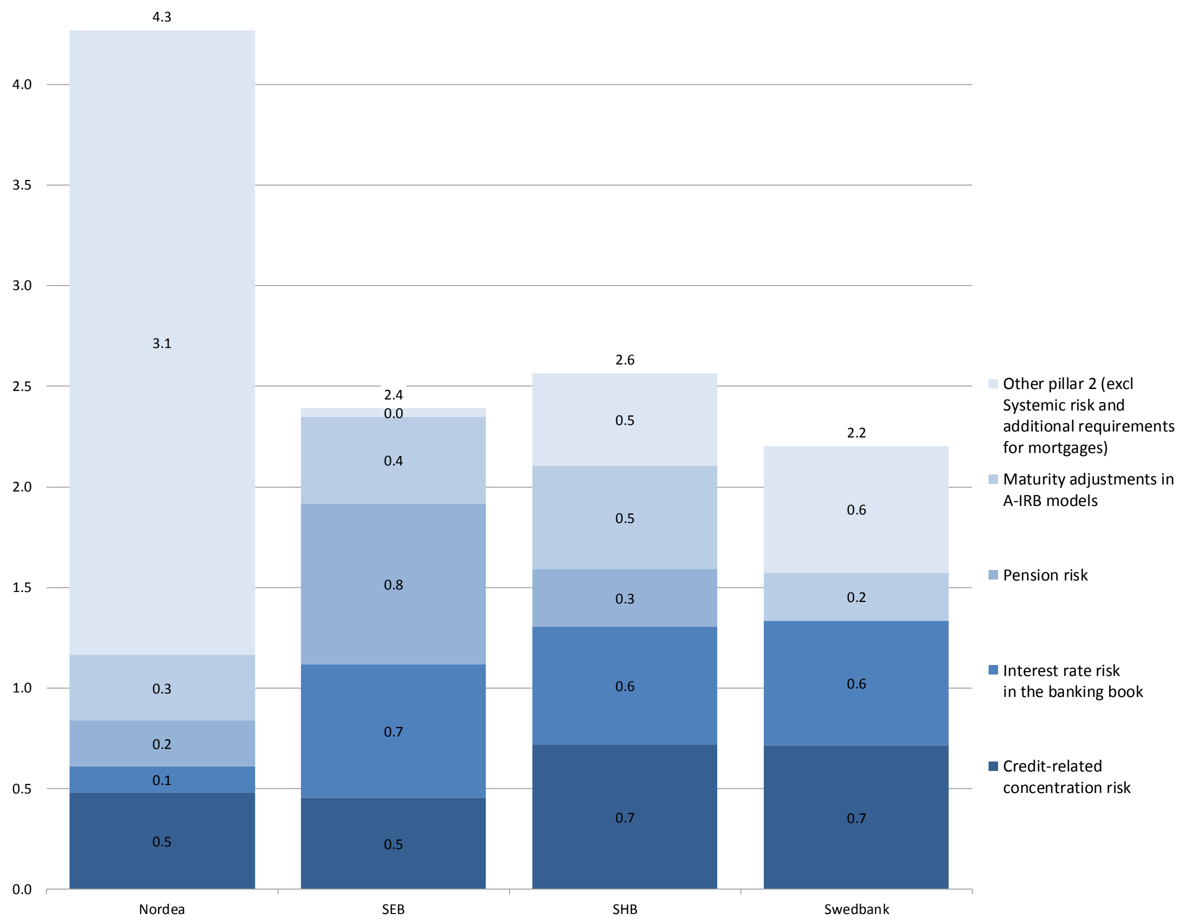
3 Common equity Tier 1 (CET1) requirement, four major banks (as percentage of total REA)



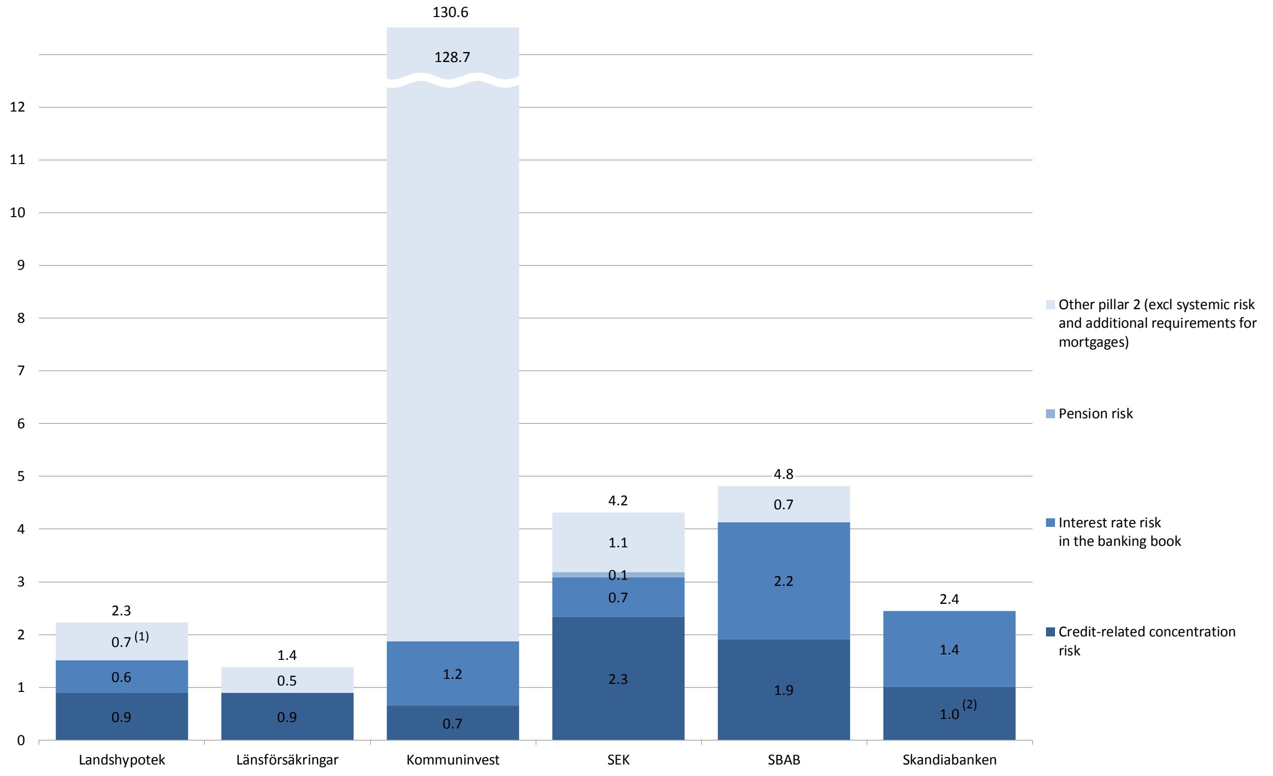
4 Common equity Tier 1 (CET1) requirement, other six firms published in this memorandum (as percentage of total REA)



5 P2 capital requirement, four major banks, excluding systemic risk and capital requirements for Swedish and Norwegian mortgages (as percentage of total REA)



6 P2 capital requirement, other six firms published in this memorandum, excluding capital requirements for Swedish and Norwegian mortgages (as percentage of total REA)



(1) *Other pillar 2 (excl systemic risk and an additional requirement for mortgages) have decreased for Landshypotek with regard to the implementation of an internal ratings-based method (IRB method) for corporate exposures and a change of the IRB method for household exposures. These capital requirements are now covered within the framework of Pillar 1.*

(2) *Skandiabanken's capital requirement for credit-related concentration risk has decreased since the bank has implemented an IRB method for mortgage credit exposures.*

Table 1 Components of the firms' combined total capital requirement in SEKm

Table 1 Components of the 10 firms' combined total capital need (mnSEK)

	Nordea[1]	SEB	SHB	Swedbank	Lands-hypotek	Länsför-säkringar	Kommun-invest	SEK	SBAB	Skandia	**Total**	**Share of total capital requirement (%)**
Minimum requirement (8 %)	102,497	50,963	44,301	34,758	2,426	5,373	368	6,825	3,657	548	**251,715**	**34**
Capital conservation buffer (2.5 %)	32,030	15,926	13,844	10,862	758	1,679	115	2,133	1,143	171	**78,661**	**11**
Credit-related concentration risk	6,136	2,900	3,978	3,108	272	599	30	1,998	875	70	**19,966**	**3**
Interest rate risk in the banking book	1,683	4,220	3,255	2,687	186	3	56	638	1,015	98	**13,841**	**2**
Pension risk	2,906	5,100	1,572	0	8	30	0	56	0	0	**9,672**	**1**
Maturity adjustments in A-IRB models	4,202	2,740	2,843	1,045	0	0	0	0	0	0	**10,830**	**1**
Other pillar 2, excl. mortgage risk weight floor & systemic risk	39,780	282	2,557	2,735	217	328	5,918	959	310	0	**53,086**	**7**
Risk weight floor mortgages Sweden (25 %)	18,837	15,953	28,588	35,912	536	5,511	-	-	8,368	1,420	**115,126**	**16**
Capital requirement Norwegian mortgages	6,548	9	2,398	5	-	-	-	-	-	-	**8,960**	**1**
Countercyclical capital buffer	9,506	6,186	6,953	5,709	606	1,335	70	1,224	903	135	**32,626**	**4**
Systemic risk, pillar 2 (2 %)	25,624	12,741	11,075	8,690	-	-	-	-	-	-	**58,130**	**8**
Systemic risk buffer (3 %)	38,437	19,111	16,613	13,034	-	-	-	-	-	-	**87,195**	**12**
Total capital requirement	**288,186**	**136,131**	**137,977**	**118,546**	**5,010**	**14,857**	**6,557**	**13,832**	**16,271**	**2,442**	**739,808**	**100**

(1) The capital requirement for Nordea presented in this memorandum is calculated according to FI's methodology and is based on Nordea Bank AB's internal model approvals. It is not affected by the ECB's decision to grant Nordea Bank Abp permission for temporary use of internal models for calculating REA. [4]

4 https://www.nordea.com/en/press-and-news/news-and-press-releases/press-releases/2018/08-17-13h40-nordea-has-received-permission-for-continued-use-of-existing-internal-models-from-the-ecb.html

Description of the calculations

The calculations of capital requirements refer to the second quarter of 2018 and are done on a group level. The Pillar 2 capital requirements are based on FI's overall capital assessment in 2017. For the majority of firms this includes the capital requirement for corporate exposures, which is presented in more detail in the memorandum *FI:s supervision of banks' calculations of risk weights for exposure to corporates*[5].

The firms have made different choices regarding their handling of profit during the current year in the calculation of the capital adequacy ratio. This means that in this memorandum the own funds for each firm may include or exclude the profit accrued during the year.

The calculations in this memorandum are based on data reported to FI. The data was submitted to FI on August 13, 2018. The rounding of each component of the capital requirement may result in a discrepancy between the sum of all parts and the total capital requirement. The size of each component has been estimated as follows.

Pillar 2 capital requirement, excluding systemic risk and capital requirements for Swedish and Norwegian mortgages. In this report, Pillar 2 reflects FI's assessment of the capital requirements for each firm.

The Pillar 2 capital requirement, excl. the requirement for systemic risk and capital requirements for mortgages, is illustrated as an aggregate for each firm in Charts 1-4 and broken down into five components in Charts 5-6. These components are *Credit-related concentration risk*, *Interest rate risk in the banking book*, *Pension risk*, *Maturity adjustments* and *Other Pillar 2 requirements*.

Other Pillar 2 requirements in turn is an aggregate of the Pillar 2 capital requirements, which are not presented individually. These capital requirements are not subject to standardised and fully common evaluation methods, which is why they are not disclosed at a more detailed level in this memorandum. This contains risk elements such as market and credit risk that are not considered in Pillar 1 as well as, in certain cases, capital requirements for shortcomings in governance, risk management and control.

The share of the capital requirement which, as a main rule, is to be covered by common equity Tier 1 (CET 1) capital is determined in accordance with the distribution of Pillar 1 capital, including the combined buffer requirement with the exception of the countercyclical capital buffer, for the four major banks and the other six firms. In some cases the countercyclical capital buffer is included in different ways.

Risk weight floor of 25 per cent for Swedish mortgages. The increased risk-weighted exposure amount brought about by the risk weight floor of 25 per cent has been multiplied by the relevant capital requirement. The calculation

[5] Memorandum published at fi.se 2016, FI Ref. 15–13020.

of the capital requirement resulting from the risk weight floor must contain all capital requirements relating to Pillar 1, including the countercyclical capital buffer for Sweden. For the four major banks the calculation also includes the total capital buffer requirement associated with systemic risk, which amounts to 5 per cent.

Capital requirement for Norwegian mortgages. Finanstilsynet in Norway has introduced measures under Pillar 1 for exposures to mortgages which are contributing to higher capital requirements for Norwegian banks. Swedish firms with exposures to Norwegian mortgages, instead of implementing the measures, will hold capital under Pillar 2 to match the increase in capital requirements from the Pillar 1 measures. The size of the capital requirement is set on an individual basis and is to be calculated by each firm in connection to their internal capital evaluation process (ICAAP) and, in turn, added to the other Pillar 2 requirements. Finanstilsynet has calculated the effect of these measures for the Norwegian domestic firms, which has resulted in risk weights of between 20 and 25 per cent.

The calculation of the capital requirement for Norwegian mortgages must contain all capital requirements relating to Pillar 1, including the countercyclical capital buffer value for Norway. For the four major banks this includes the total capital buffer requirement associated with systemic risk, which amounts to 5 per cent.

FI has also acknowledged the Finnish supervisory authority's decision to introduce an average company-specific risk weight floor of 15 per cent for Finnish mortgage exposures[6]. As of 1 January 2018, Sweden is reciprocating the Finnish risk weight floor for mortgages according to Article 458(5) of Regulation (EU) No. 575/2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms (CRR). This capital requirement will be part of Pillar 1 for affected institutions.

Systemic risk in Pillar 2. Two per cent of the total risk-weighted amount for the major banks. Covered in its entirety by CET 1 capital.

Systemic risk buffer. Three per cent of the total risk-weighted amount for the major banks. Covered in its entirety by CET 1 capital.

Countercyclical capital buffer. As of 19 March 2017, Sweden applies a counter-cyclical buffer of 2.0 per cent. Other EEA countries' countercyclical buffer values are included in the analysis as they come into force[7]

The firm-specific buffer value has been estimated on the basis of reported data according to the European common instructions for reporting (COREP). In order to calculate the firm-specific buffer value the relevant credit exposure in each country is multiplied by the countercyclical buffer rate for each country.

[6] For an overview of the decision and the institutions to which the decision applies, see FI's website: https://www.fi.se/contentassets/4b9d4b6504c547b1b3387a0d576f5d1e/beslut-finskt-riskviktsgolv-n.pdf

[7] For an overview of the current countercyclical buffer rates, see ESRB's website: https://www.esrb.europa.eu/national_policy/ccb/all_rates/html/index.en.html

In compliance with Chapter 6, Section 5 of the Capital Buffer Act (2014: 966), Sweden also applies full reciprocity for non-EEA countries, as long as the countercyclical buffer for the country is less than 2.5 per cent and FI has not decided otherwise in compliance with Chapter 7, Sections 4 and 5.

Capital conservation buffer. 2.5 per cent of the total risk-weighted exposure amount. Covered in its entirety by CET 1 capital.

Capital planning buffer. FI's stress tests to determine the capital planning buffer for 2017 have shown that the buffer does not exceed 2.5 per cent for any of the ten firms. A buffer requirement in excess of capital conservation buffer is thus not required for any of the firms. This method is further described in *Stress test methodology for determining the capital planning buffer*[8] and *Capital requirements for Swedish banks*[9].

Basel I floor. The capital requirements and reporting in accordance with the Basel I floor were repealed on 1 January 2018 in accordance with Article 500(1) of the CRR (575/2013/EU). Under the Basel I floor, the capital requirement for banks that use internal models for credit risks or operating risks could not be lower than 80 per cent of the capital requirement calculated in accordance with the Basel I regulation. As of Q1 2018, the Basel I floor will therefore no longer be reported in this memorandum.

[8] Memorandum published at fi.se 2016, FI Ref. 15-11526
[9] Memorandum published at fi.se 2014, FI Ref. 14–6258