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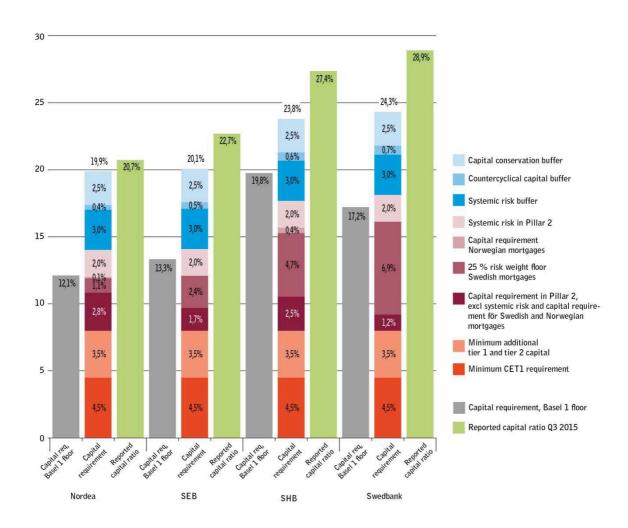
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Capital requirements of the Swedish banks, third quarter 2015

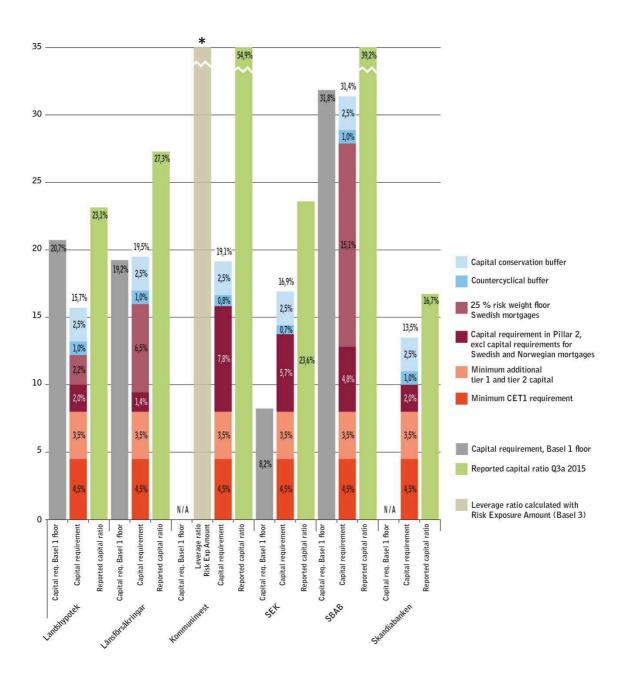
Finansinspektionen publishes on a quarterly basis the capital requirements of the ten largest Swedish banks and credit institutions. This memorandum discloses these firms' capital requirements and capital ratios as of the end of the third quarter 2015. In this memorandum FI is disclosing, for the first time, the actual values for the requirements in pillar 2. Finansinspektionen has, for all but two firms (Landshypotek and Skandiabanken), finalized the supervisory review and evalution process and thereby adopted its' capital requirements.

1 Total capital requirement, four major banks





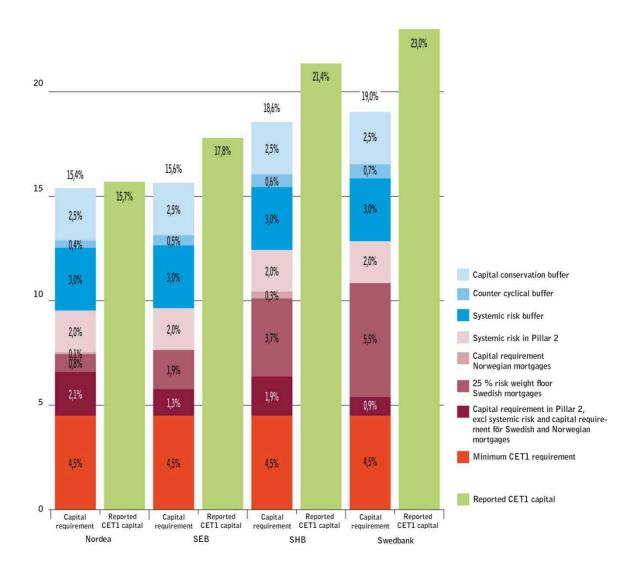
2 Total capital requirement, other six firms



^{*} In order for Kommuninvest to contain the risk of an inadequate future level of leverage ratio, FI has demanded of Kommuninvest to follow its' action plan aiming to strengthen the leverage ratio. This chart shows leverage ratio as capital requirement in relation to risk exposure amount.

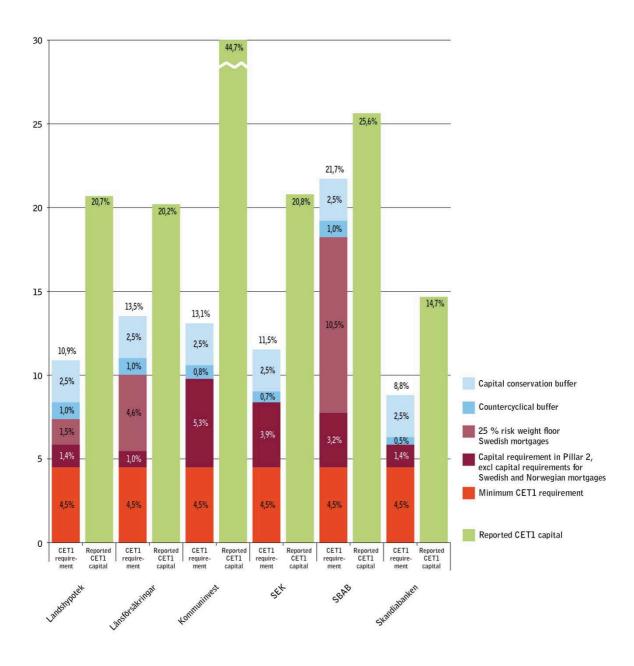


3 Common equity Tier 1 (CET1) capital requirement, four major banks



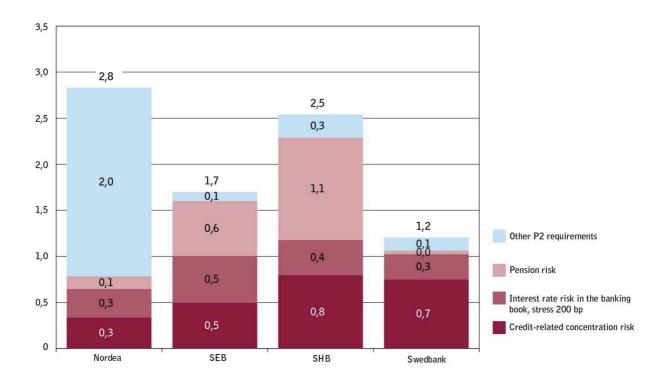


4 Common equity Tier 1 (CET1) capital requirement, other six firms





5 Capital requirement in P2, four major banks, excl. systemic risk and capital requirements for Swedish and Norwegian mortgages (in per cent of total risk exposure amount)





6 Capital requirement in P2, other four firms, excl. capital requirements for Swedish and Norwegian mortgages (in per cent of total risk exposure amount)

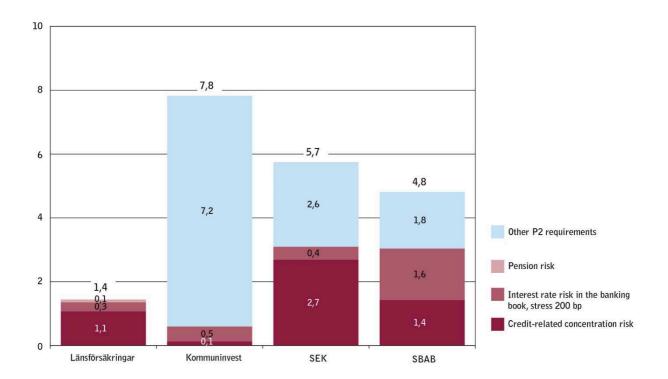




Table 1 Components of the 10 largest firms' combined total capital requirement in mnSEK

				Lands-	Länsför-	Kommun-			Skandia-	
Nordea	SEB	SHB	Swedbank	hypotek	säkringar	invest	SEK	SBAB	banken	Total
110 420	48 337	37 883	32 336	1 629	3 952	548	6 033	3 234	3 497	247 868
34 506	15 105	11 838	10 105	509	1 235	171	1 885	1 011	1 093	77 459
39 078	10 268	12 033	4 876	407 *	712	536	4 333	1 946	874 *	75 063
14 822	14 470	22 428	27 985	449	3 233	-	-	6 095	-	89 481
1 818	11	1 938	4	-	-	-	-	-	-	3 771
4 892	2 953	2 912	2 769	204	493	56	498	401	436	15 614
27 605	12 084	9 471	8 084	-	-	-	-	-	-	57 244
41 407	18 126	14 206	12 126	-	-	-	-	-	-	85 866
-	-	-	-	1 021	-	-	-	189	-	1 210
274 548	121 353	112 711	98 285	4 218	9 625	1 311	12 749	12 876	5 900	653 575
167 241	80 549	93 543	69 561	4 218	9 505	-	6 204	12 876	-	424 616
	34 506 39 078 14 822 1 818 4 892 27 605 41 407 - 274 548	110 420 48 337 34 506 15 105 39 078 10 268 14 822 14 470 1 818 11 4 892 2 953 27 605 12 084 41 407 18 126 - -	110 420 48 337 37 883 34 506 15 105 11 838 39 078 10 268 12 033 14 822 14 470 22 428 1 818 11 1938 4 892 2 953 2 912 27 605 12 084 9 471 41 407 18 126 14 206 - - - 274 548 121 353 112 711	110 420 48 337 37 883 32 336 34 506 15 105 11 838 10 105 39 078 10 268 12 033 4876 14 822 14 470 22 428 27 985 1 818 11 1938 4 4 892 2 953 2 912 2 769 27 605 12 084 9 471 8 084 41 407 18 126 14 206 12 126 - - - - 274 548 121 353 112 711 98 285	Nordea SEB SHB Swedbank hypotek 110 420 48 337 37 883 32 336 1 629 34 506 15 105 11 838 10 105 509 39 078 10 268 12 033 4876 407 * 14 822 14 470 22 428 27 985 449 1 818 11 1 938 4 - 27 605 12 084 9 471 8 084 - 41 407 18 126 14 206 12 126 - - - - 1 021 274 548 121 353 112 711 98 285 4 218	Nordea SEB SHB Swedbank hypotek säkringar 110 420 48 337 37 883 32 336 1 629 3 952 34 506 15 105 11 838 10 105 509 1 235 39 078 10 268 12 033 4 876 407 * 712 14 822 14 470 22 428 27 985 449 3 233 1 818 11 1 938 4 - - 4 892 2 953 2 912 2 769 204 493 27 605 12 084 9 471 8 084 - - 41 407 18 126 14 206 12 126 - - - - - 1 021 - 274 548 121 353 112 711 98 285 4 218 9 625	Nordea SEB SHB Swedbank hypotek säkringar invest 110 420 48 337 37 883 32 336 1 629 3 952 548 34 506 15 105 11 838 10 105 509 1 235 171 39 078 10 268 12 033 4 876 407 * 712 536 14 822 14 470 22 428 27 985 449 3 233 - 4 892 2 953 2 912 2 769 204 493 56 27 605 12 084 9 471 8 084 - - - 41 407 18 126 14 206 12 126 - - - - - - - - - 274 548 121 353 112 711 98 285 4 218 9 625 1311	Nordea SEB SHB Swedbank hypotek säkringar invest SEK 110 420 48 337 37 883 32 336 1 629 3 952 548 6 033 34 506 15 105 11 838 10 105 509 1 235 171 1 885 39 078 10 268 12 033 4 876 407 * 712 536 4 333 14 822 14 470 22 428 27 985 449 3 233 - - 1 818 11 1 938 4 - - - - 4 892 2 953 2 912 2 769 204 493 56 498 27 605 12 084 9 471 8 084 - - - - 41 407 18 126 14 206 12 126 - - - - - - - 1021 - - - - - - - 1021	Nordea SEB SHB Swedbank hypotek säkringar invest SEK SBAB 110 420 48 337 37 883 32 336 1 629 3 952 548 6 033 3 234 34 506 15 105 11 838 10 105 509 1 235 171 1 885 1 011 39 078 10 268 12 033 4 876 407 * 712 536 4 333 1 946 14 822 14 470 22 428 27 985 449 3 233 - - 6 095 1 818 11 1 938 4 - - - - - 4 892 2 953 2 912 2 769 204 493 56 498 401 27 605 12 084 9 471 8 084 - - - - - 41 407 18 126 14 206 12 126 - - - - - - - - - <td>Nordea SEB SHB Swedbank hypotek säkringar invest SEK SBAB banken 110 420 48 337 37 883 32 336 1 629 3 952 548 6 033 3 234 3 497 34 506 15 105 11 838 10 105 509 1 235 171 1 885 1 011 1 093 39 078 10 268 12 033 4 876 407 * 712 536 4 333 1 946 874 * 14 822 14 470 22 428 27 985 449 3 233 - - 6 095 - 1818 11 1 938 4 - - - - - - - 4 892 2 953 2 912 2 769 204 493 56 498 401 436 27 605 12 084 9 471 8 084 - - - - - - - - - - - -</td>	Nordea SEB SHB Swedbank hypotek säkringar invest SEK SBAB banken 110 420 48 337 37 883 32 336 1 629 3 952 548 6 033 3 234 3 497 34 506 15 105 11 838 10 105 509 1 235 171 1 885 1 011 1 093 39 078 10 268 12 033 4 876 407 * 712 536 4 333 1 946 874 * 14 822 14 470 22 428 27 985 449 3 233 - - 6 095 - 1818 11 1 938 4 - - - - - - - 4 892 2 953 2 912 2 769 204 493 56 498 401 436 27 605 12 084 9 471 8 084 - - - - - - - - - - - -

^{*} A standardised value of 2 per cent of the total risk weighted exposure amount is used for Landshypotek and Skandiabanken due to the Supervisory Review and Evaluation Process (SREP) for these two firms not being completed.



Description of the calculations

The effects have been assessed based on data primarily pertaining to the third quarter of 2015. The calculations pertain to the consolidated level. The capital requirements in Pillar 2 is based on the actual Supervisory Review and Evaluation Process (SREP) of 2015 conducted by FI for each firm except Landshypotek and Skandiabanken. As the actual SREP for 2015 is yet to be finalized for the latter two firms a standardized value is used for Pillar 2.

The calculations in this memorandum are based on reported data from the ten firms as of the third quarter of 2015. This data can, in certain aspects, differ from one company to another, for example when it comes to retained earnings. This means that the ten firms differ in their treatment of retained earnings for the purpose of calculating the capital base.¹

The effects described in this chapter comprise ten firms, eight of these shall comply with the Basel 1 floor; the four major banks, Landshypotek, Länsförsäkringar, SBAB and SEK. The effects of the Basel 1 floor are accounted for below as well as in *Finansinspektionen's approach to the Basel 1 floor*.²

The size of the various components of the capital requirement has been estimated as follows.

Capital requirement in Pillar 2, excluding systemic risk and capital requirements for Swedish and Norwegian mortgages. Pillar 2 is an umbrella term for the set of rules encompassing the firms' internal capital evaluation as well as FI:s supervisory review and evaluation process, where FI:s overall capital requirement serves an important part.

The capital requirement in Pillar 2, excl. requirement for systemic risk and capital requirements for mortgages, is illustrated as an aggregate for each firm in Chart 1.1 to 1.4 and divided into four components in Chart 1.5 and 1.6. These components consist of the three risk types; Credit-related concentration risk, Interest rate risk in the banking book, Pension risk and Other Pillar 2 requirements. The latter component, Other Pillar 2 requirements, is in turn an aggregate of capital requirements in Pillar 2 which are not presented separately. These capital requirements are not subject to standardized and fully common evaluation methods which is the reason why they are not disclosed at a more granular level in this memorandum.

The Other Pillar 2 requirements consists of risk elements such as market and credit risk which are not treated in Pillar 1 as well as, in certain cases, capital requirements for shortcomings in governance, risk management and control.

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¹ Kommuninvest, Landshypotek, Nordea and Skandiabanken have excluded their retained earnings, for the current year, from the reported capital base.

² Memorandum published on fi.se on 18 March 2014, FI ref. 13-13990.



The share of the capital requirement which is to be covered by common equity Tier 1 (CET 1) capital is decided in accordance with the distribution of capital in Pillar 1 (including the combined buffer requirement except the countercyclical capital buffer) for the four major banks and the other six firms.

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. When calculating the capital requirement resulting from the risk weight floor, all capital requirements relating to Pillar 1 are to be included, counting the countercyclical capital buffer value for Sweden. For the four major banks this includes the total capital buffer requirement associated with systemic risk which amounts to 5 per cent.

Capital requirement for Norwegian mortgages. The 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 will, instead of implementing the measures, 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 their internal capital evaluation process (ICAAP) and, in turn, added to the other pillar 2 requirements. The 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.

For the firms which are subject to these measures but are yet calculate the actual size of the capital requirement, FI is using an indicative risk weight of 25 per cent. This risk weight could be adjusted depending on the outcome and certainty of the firms individual calculations based on the measures introduced by the Finanstilsynet.

When calculating the capital requirement for Norwegian mortgages all capital requirements relating to Pillar 1 are to be included, counting 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 cents.

<u>Systemic risk in Pillar 2.</u> 2 per cent of the total risk-weighted amount for the major banks. Covered in its entirety by common equity Tier 1 (CET 1) capital.

<u>Systemic risk buffer.</u> 3 per cent of the total risk-weighted amount for the major banks. Covered in its entirety by common equity Tier 1 (CET 1) capital.

<u>Countercyclical capital buffer.</u> The Swedish and Norwegian countercyclical buffer rate of 1 per cent separately has been used in the calculation. 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 with the countercyclical buffer rate of each country.

The forthcoming increase in the Swedish and Norwegian countercyclical buffer rate, from 1 to 1.5 per cent, will be taken into account as they come into effect as of the 27th of June 2016 and the 30th of June 2016 respectively.

Amongst foreign countercyclical buffer rate it is only the Norwegian rate that is taken into account. Currently, no member of the European union has as of yet implemented a countercyclical buffer rate other than zero percent.³

<u>Capital conservation buffer.</u> 2.5 per cent of the total risk-weighted exposure amount. Covered in its entirety by common equity Tier 1 (CET 1) capital.

<u>Capital planning buffer</u>. The capital planning buffer is not being considered in this memorandum.

<u>Basel I-floor</u>. According to Swedish law, the Basel I-floor represents a minimum capital requirement calculated in Swedish kronor. The capital requirement is 8 per cent of the total risk weighted assets calculated in accordance with the Basel I rules. The minimum own funds requirement is 80 per cent of the capital requirement calculated according to the Basel 1 rules.

The definition of own funds has changed in CRR and CRD 4 compared to the Basel Directives. Own funds, to be compared with the Basel 1 floor, shall be adjusted in accordance with Article 500(4) of CRR. The adjustment aims to neutralise the impact that the expected loss amount, calculated with the internal model for credit risk, has on the size of the own funds. In this memorandum, own funds are illustrated without the adjustment in accordance with Article 500(4) which results in less comparability between capital requirements based on risk exposure amount these requirements based on Basel 1 floor.

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³ For an overview of the current countercyclical buffer rates, see ESRB's web-page: https://www.esrb.europa.eu/mppa/html/index.en.html