

MEMORANDUM



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Capital requirements for the Swedish banks, fourth quarter 2018

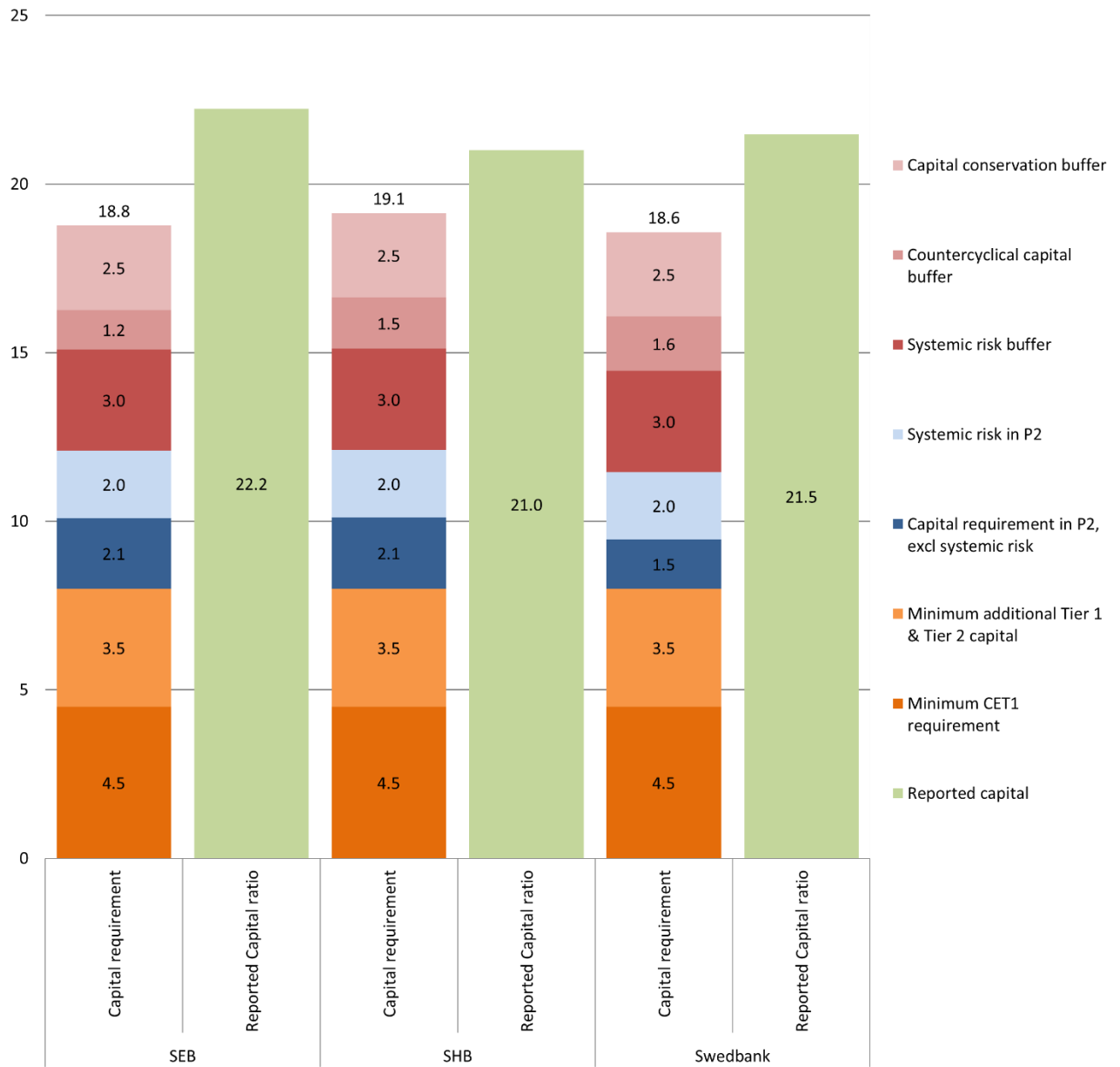
Finansinspektionen publishes on a quarterly basis the capital requirements of the largest Swedish banks and credit institutions under its supervision that have been categorised as Categories 1 and 2.¹ This memorandum discloses these firms' capital requirements and capital ratios as at the end of the fourth quarter of 2018, including the values for the requirements in Pillar 2.²

As of 31 December 2018, the risk weight floor for Swedish mortgages, which previously was managed under Pillar 2, was replaced by an equivalent requirement in Pillar 1 in line with article 458 in the CRR. This change has not affected the capital level or the underlying risk. However, it has affected the Swedish banks' capital requirements when set in relation to their risk-weighted assets in that the capital ratios are now lower when expressed as a percentage. The reason is that the requirement in the new design increases the amount of risk-weighted assets, unlike a Pillar 2 requirement which instead increases the requirement as a percentage. The capital requirement for Norwegian mortgages is still applied.

¹FI 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). A list of the credit institutions' supervision categories is available at the following link: <https://www.fi.se/contentassets/58c785ac536c4512be8a76158a3d994e/tillsynskategorisering-svenska-kreditinstitut-2018.pdf>

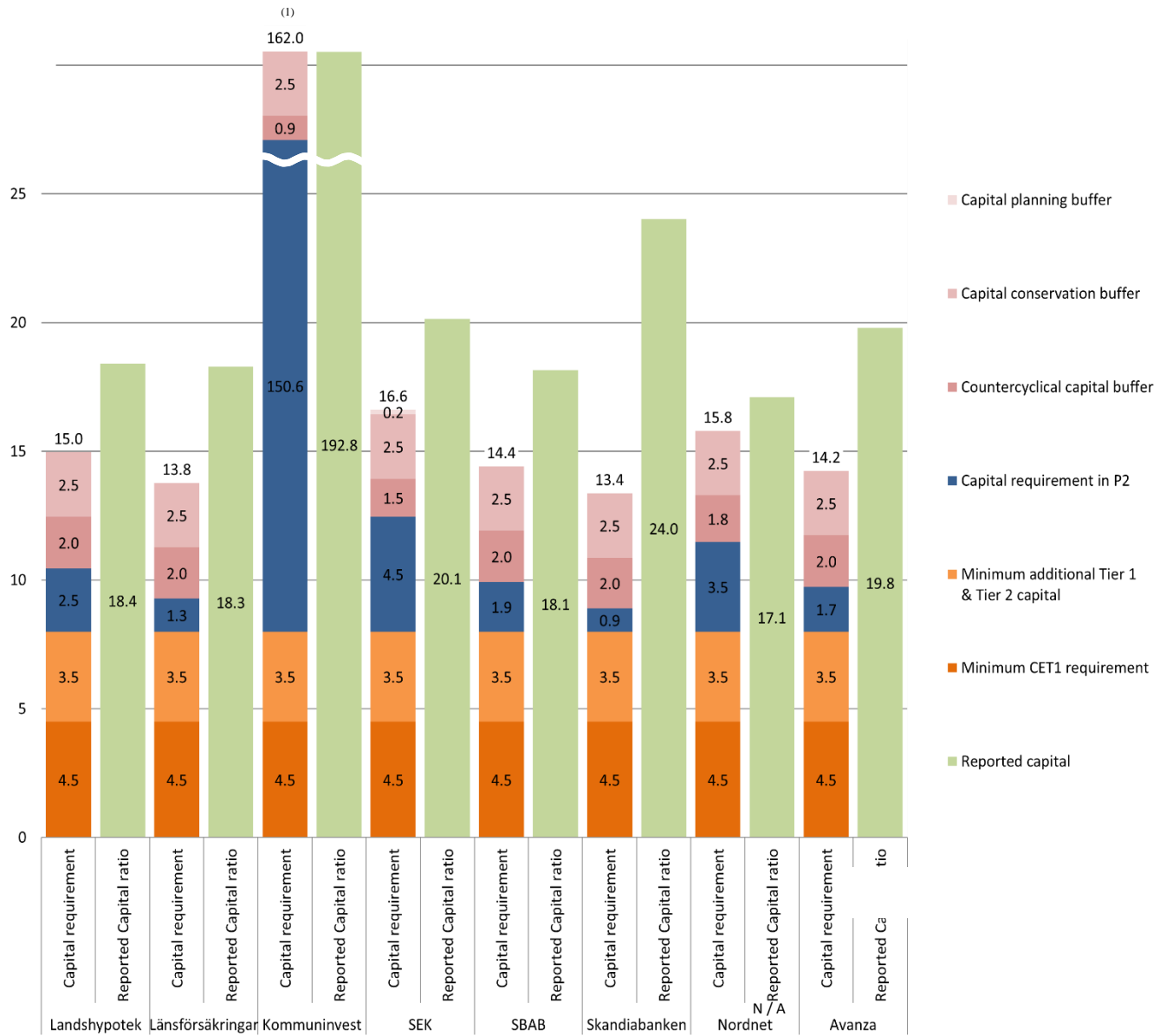
² The actual values in Pillar 2 in terms of "Capital requirement in Pillar 2, excl systemic risk" refers to Finansinspektionen's assessment of the capital requirements in the 2018 Supervisory Review and Evaluation Process (SREP). Exceptions are SBAB and Skandiabanken, which have not been subject of a SREP 2018. The SREP 2017 is thus used. The guidelines issued by EBA requires a SREP every two years for category 2.

1 Total capital requirement, three major banks (as percentage of total REA³)



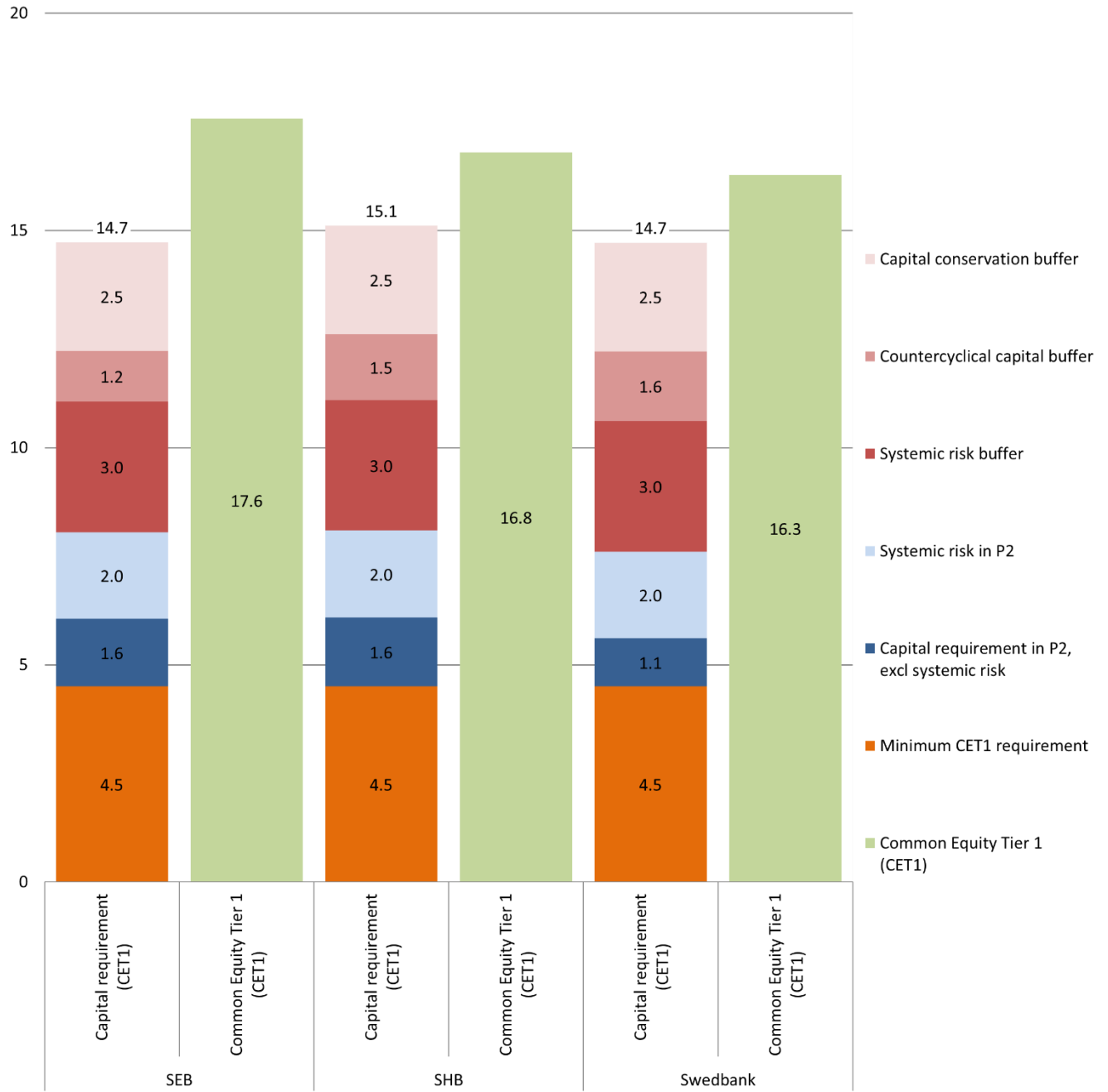
³ Risk Exposure Amount

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

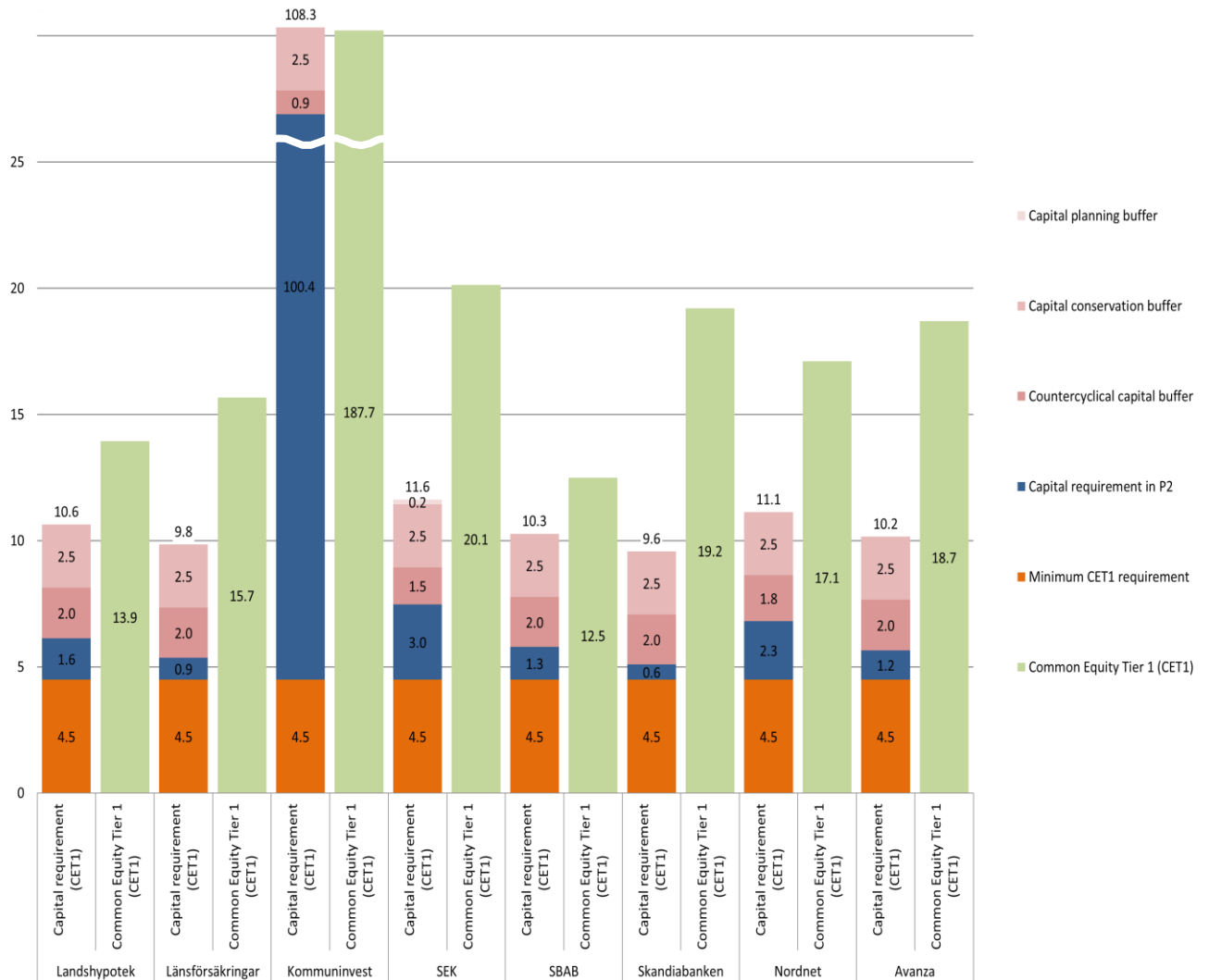


(1) To cover the risk for excessive leverage, FI has assessed that Kommuninvest needs to have own funds amounting to at least 1.5 per cent of its total leverage ratio exposure. For the purpose of reaching this total own funds requirement, an additional capital charge for the risk of excessive leverage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

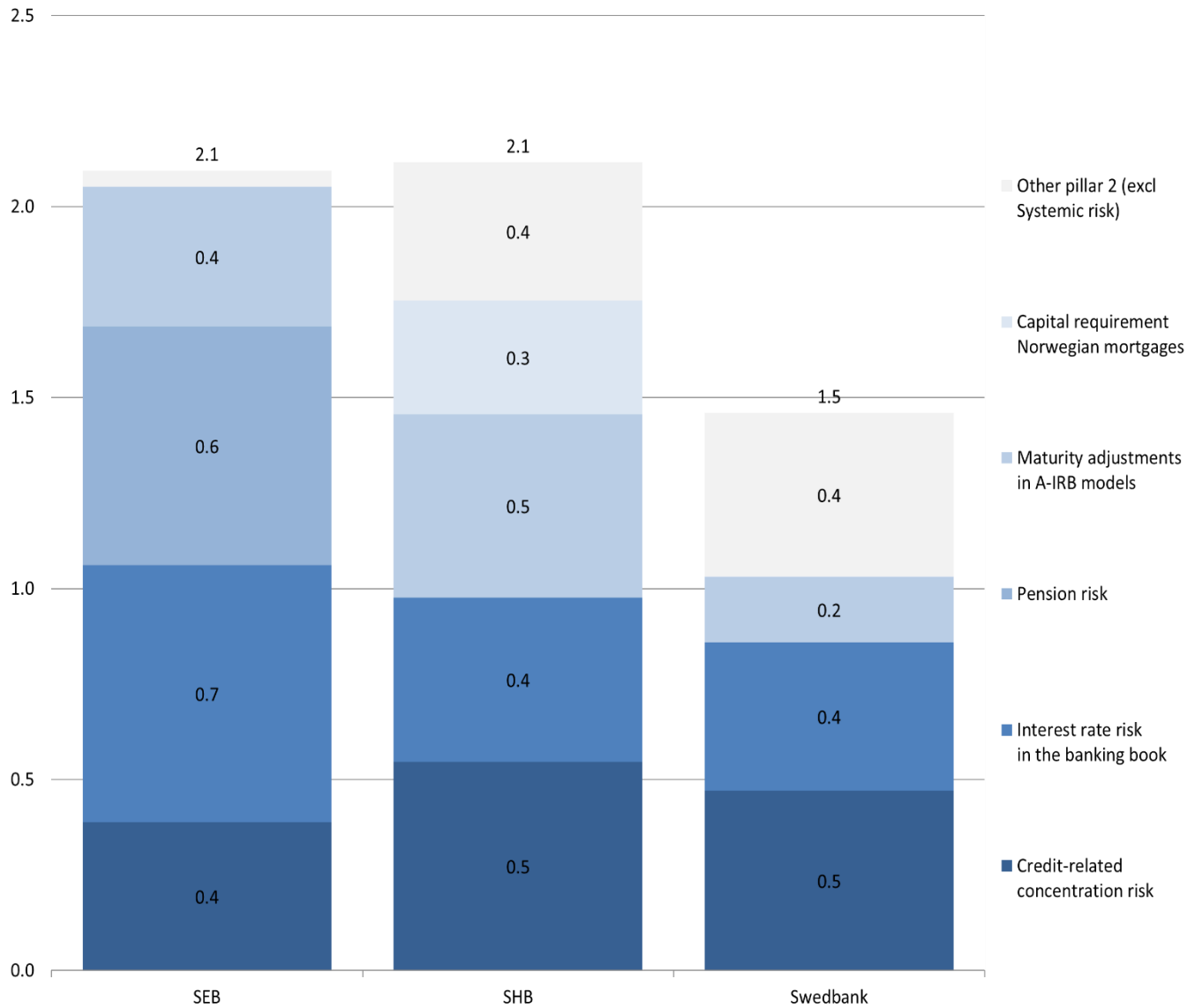
3 Common equity Tier 1 (CET1) requirement, three major banks (as percentage of total REA)



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



5 P2 capital requirement, three major banks, excluding systemic risk (as percentage of total REA)



6 P2 capital requirement, other eight firms published in this memorandum (as percentage of total REA)

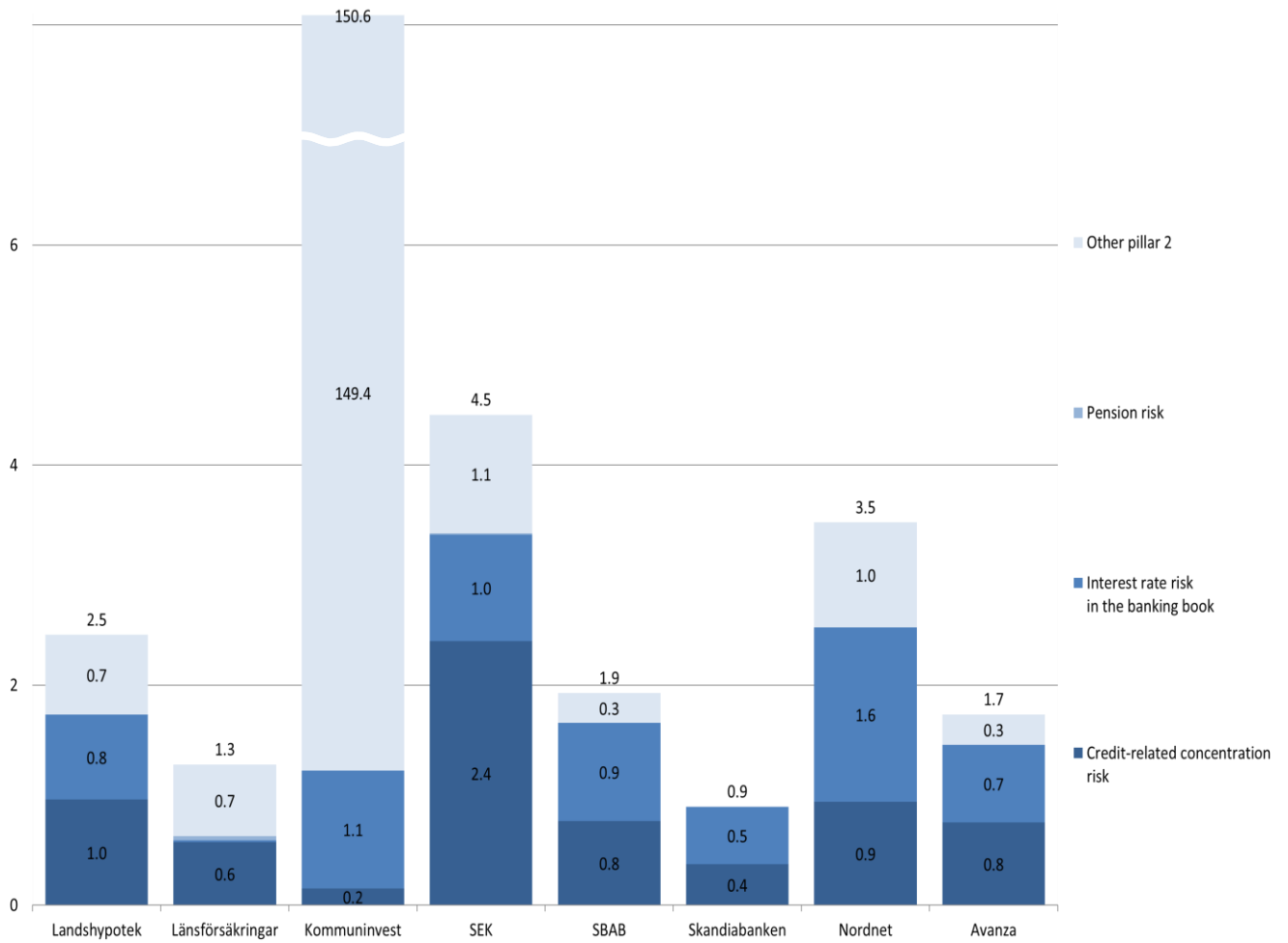


Table 1 Components of the firms' combined total capital requirement in SEKm

Table 1 Components of the 11 firms' combined total capital need (mnSEK)

	SEB	SHB	Swedbank	Lands- hypotek	Länsför- säkringar	Kommun- invest	SEK	SBAB	Skandia	Nordnet	Avanza	Total requirement (%)	Share of total capital requirement (%)
Minimum requirement (8%)	57,320	56,606	51,031	2,693	9,063	313	6,964	9,131	1,497	681	521	195,821	43
<i>of which mortgages from Art. 45B</i>	<i>7,327</i>	<i>13,050</i>	<i>16,685</i>	<i>391</i>	<i>3,602</i>	<i>0</i>	<i>0</i>	<i>5,658</i>	<i>954</i>	<i>0</i>	<i>0</i>	<i>47,666</i>	<i>11</i>
Capital conservation buffer (2.5%)	17,912	17,689	15,947	842	2,832	98	2,176	2,854	468	213	163	61,194	14
<i>of which mortgages from Art. 45B</i>	<i>2,290</i>	<i>4,079</i>	<i>5,214</i>	<i>122</i>	<i>1,125</i>	<i>0</i>	<i>0</i>	<i>1,768</i>	<i>298</i>	<i>0</i>	<i>0</i>	<i>14,636</i>	<i>3</i>
Credit-related concentration risk	2,781	3,865	3,002	323	649	6	2,089	875	70	80	49	13,789	3
Interest rate risk in the banking book	4,825	3,046	2,478	260	18	42	844	1,015	98	135	46	12,807	3
Pension risk	4,468	0	0	0	43	0	11	0	0	0	0	4,522	1
Maturity adjustments in A- IRB models	2,623	3,391	1,092	0	0	0	0	0	0	0	0	7,106	2
Other Pillar 2 capital requirements	298	2,557	2,734	244	739	5,851	936	310	0	81	18	13,768	3
Capital requirement Norwegian mortgages	9	2,108	5	-	-	-	-	-	-	-	-	2,123	0
Countercyclical capital buffer	8,406	10,764	10,283	673	2,250	37	1,286	2,266	369	154	130	36,619	8
<i>of which mortgages from Art. 45B</i>	<i>1,832</i>	<i>3,262</i>	<i>4,171</i>	<i>98</i>	<i>900</i>	<i>0</i>	<i>0</i>	<i>1,414</i>	<i>298</i>	<i>0</i>	<i>0</i>	<i>11,916</i>	<i>3</i>
Systemic risk, pillar 2 (2%)	14,330	14,152	12,758	-	-	-	-	-	-	-	-	41,239	9
<i>of which mortgages from Art. 45B</i>	<i>1,832</i>	<i>3,262</i>	<i>4,171</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>9,266</i>	<i>2</i>
Systemic risk buffer (3%)	21,495	21,227	19,136	-	-	-	-	-	-	-	-	61,859	14
<i>of which mortgages from Art. 45B</i>	<i>2,748</i>	<i>4,894</i>	<i>6,257</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>13,698</i>	<i>3</i>
Capital planning buffer	-	-	-	-	-	-	157	-	-	-	-	157	0
Total capital requirement	134,467	135,407	118,465	5,035	15,594	6,347	14,464	16,451	2,501	1,344	928	451,002	100

Description of the calculations

The calculations of capital requirements refer to the fourth quarter of 2018 and are done on a group level. The Pillar 2 capital requirements are based on FI's latest overall capital assessment. For some of the 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*⁴.

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 February 11, 2019. 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. The Pillar 2 capital requirement, excl. the requirement for systemic risk, is illustrated as an aggregate for each firm in Charts 1-4 and broken down into six components in Charts 5-6. These components are *Credit-related concentration risk, Interest rate risk in the banking book, Pension risk, Maturity adjustments, Capital requirements for Norwegian mortgages* and *Other Pillar 2 requirements*.

Regarding the 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 three 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

⁴ Memorandum published at fi.se 2016, FI Ref. 15-13020.

Finnish mortgage exposures⁵. 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.

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 three major banks and the other eight firms. In some cases the countercyclical capital buffer is included in different ways.

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 force⁶

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.

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 2018 have shown that the buffer exceeds 2.5 per cent for one of the

⁵ 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>

⁶ For an overview of the current countercyclical buffer rates, see ESRB's website: https://www.esrb.europa.eu/national_policy/ccb/applicable/html/index.en.html

eleven firms. A buffer requirement in excess of the capital conservation buffer is therefore required for that firm. The methodology is further described in *Stress test methodology for determining the capital planning buffer*⁷ and *Capital requirements for Swedish banks*⁸.

⁷ Memorandum published at fi.se 2016, FI Ref. 15-11526

⁸ Memorandum published at fi.se 2014, FI Ref. 14-6258