

## Note 4 - Capital adequacy

SpareBank 1 SMN utilises the Internal Rating Based Approach (IRB) for credit risk. Use of IRB imposes wide-ranging requirements on the bank's organisational set-up, competence, risk models and risk management systems. As from 31 March 2015 the bank has received permission to apply the Advanced IRB Approach to those corporate portfolios that were previously reported under the Basic Indicator Approach. The EU capital adequacy framework (CRR/CRDIV) was incorporated into Norwegian law with effect from 31 December 2019. The Basel I floor was accordingly removed and an SME rebate introduced.

As of 31 December 2020 the overall minimum requirement on CET1 capital is 12.5 per cent. The capital conservation buffer requirement is 2.5 per cent, the systemic risk requirement for Norwegian IRB-banks is raised to 4.5 per cent and the Norwegian countercyclical buffer is 1.0 per cent. These requirements are additional to the requirement of 4.5 per cent CET1 capital. In addition the financial supervisory authority has set a Pillar 2 requirement of 1.9 per cent for SpareBank 1 SMN, however not below NOK 1,794 million in monetary terms. As at 31 December 2020, reduced risk weighted assets mean that the minimum monetary requirement of NOK 1,794 million is binding for the Pillar 2 requirement. The Pillar 2 requirement therefore rises from 1.9 per cent to 1.93 per cent. The overall minimum requirement as of 31 December 2019 has accordingly increased from 14.4 per cent to 14.43 per cent.

The systemic risk buffer stands at 4.5 per cent for the Norwegian exposures. For exposures in other countries, the particular country's systemic buffer rate shall be employed. As of 31 December 2020 the effective rate for the parent bank and for the group is accordingly 4.4 per cent.

The countercyclical buffer is calculated using differentiated rates. For exposures in other countries the countercyclical buffer rate set by the authorities in the country concerned is applied. If that country has not set a rate, the same rate as for exposures in Norway is applied unless the Ministry of Finance sets another rate. For the fourth quarter of 2020 both the parent bank and the group is below the capital deduction threshold such that the Norwegian rate is applied to all relevant exposures.

The Supervisory Board adopted at its meeting on 26 March 2020 a revised proposal for application of the net profit for 2019 entailing an overall reduction of 303 NOK million compared with the original proposal of NOK 1,314 million for distribution as dividends and donations. Historical figures as at 31 December 2019 are not restated, but the effect of the above decision as at 31 December 2019 is shown in the table below.

The group's hybrid equity and subordinated debt issued under the old rules has now been redeemed such that as of the first quarter of 2020 the group has no holdings covered by the transitional provisions.

Parent Bank			Group	
31 Dec 2019	31 Dec 2020	(NOKm)	31 Dec 2020	31 Dec 2019
<b>17,822</b>	<b>18,092</b>	<b>Total book equity</b>	<b>21,310</b>	<b>20,420</b>
-1,250	-1,250	Additional Tier 1 capital instruments included in total equity	-1,293	-1,293
-512	-515	Deferred taxes, goodwill and other intangible assets	-1,044	-1,099
-1,314	-890	Deduction for allocated dividends and gifts	-890	-1,314
-	-	Non-controlling interests recognised in other equity capital	-838	-761
-	-	Non-controlling interests eligible for inclusion in CET1 capital	488	438
-33	-43	Value adjustments due to requirements for prudent valuation	-56	-45
-305	-47	Positive value of adjusted expected loss under IRB Approach	-74	-351
-	-	Cash flow hedge reserve	10	3
-185	-186	Deduction for common equity Tier 1 capital in significant investments in financial institutions	-572	-168
<b>14,222</b>	<b>15,160</b>	<b>Common equity Tier 1 capital</b>	<b>17,041</b>	<b>15,830</b>
1,250	1,250	Additional Tier 1 capital instruments	1,595	1,637
275	-	Additional Tier 1 capital instruments covered by transitional provisions	-	275
<b>15,747</b>	<b>16,410</b>	<b>Tier 1 capital</b>	<b>18,636</b>	<b>17,742</b>
		<b>Supplementary capital in excess of core capital</b>		
1,750	1,750	Subordinated capital	2,262	2,240
12	-	Subordinated capital covered by transitional provisions	-	12
-140	-139	Deduction for significant investments in financial institutions	-139	-140
<b>1,623</b>	<b>1,611</b>	<b>Additional Tier 2 capital instruments</b>	<b>2,123</b>	<b>2,113</b>
<b>17,370</b>	<b>18,020</b>	<b>Total eligible capital</b>	<b>20,759</b>	<b>19,854</b>

<b>Minimum requirements subordinated capital</b>				
911	1,053	Specialised enterprises	1,240	1,101
1,139	920	Corporate	930	1,149
1,628	1,511	Mass market exposure, property	2,261	2,299
98	107	Other mass market	110	101
984	1,026	Equity investments	1	1
<b>4,760</b>	<b>4,617</b>	<b>Total credit risk IRB</b>	<b>4,541</b>	<b>4,651</b>
2	1	Central government	2	3
86	93	Covered bonds	142	132
419	441	Institutions	332	282
-	-	Local and regional authorities, state-owned enterprises	27	5
42	32	Corporate	281	239
22	20	Mass market	476	463
9	11	Exposures secured on real property	136	167
236	272	Equity positions	408	377
104	99	Other assets	159	151
<b>918</b>	<b>970</b>	<b>Total credit risk standardised approach</b>	<b>1,962</b>	<b>1,818</b>
31	30	Debt risk	31	34
-	-	Equity risk	18	15
-	-	Currency risk and risk exposure for settlement/delivery	3	3
407	421	Operational risk	770	720
29	25	Credit value adjustment risk (CVA)	123	115
<b>6,145</b>	<b>6,063</b>	<b>Minimum requirements subordinated capital</b>	<b>7,448</b>	<b>7,357</b>
<b>76,817</b>	<b>75,785</b>	<b>Risk weighted assets (RWA)</b>	<b>93,096</b>	<b>91,956</b>
3,457	3,410	Minimum requirement on CET1 capital, 4.5 per cent	4,189	4,138
		Capital Buffers		
1,920	1,895	Capital conservation buffer, 2.5 per cent	2,327	2,299
2,305	3,410	Systemic risk buffer, 4.5 per cent (3.0 per cent)	4,189	2,759
1,920	758	Countercyclical buffer, 1.0 per cent (2.5 per cent)	931	2,299
<b>6,145</b>	<b>6,063</b>	<b>Total buffer requirements on CET1 capital</b>	<b>7,448</b>	<b>7,357</b>
<b>4,620</b>	<b>5,687</b>	<b>Available CET1 capital after buffer requirements</b>	<b>5,404</b>	<b>4,335</b>
		<b>Capital adequacy</b>		
18.5 %	20.0 %	Common equity Tier 1 capital ratio	18.3 %	17.2 %
20.5 %	21.7 %	Tier 1 capital ratio	20.0 %	19.3 %
22.6 %	23.8 %	Capital ratio	22.3 %	21.6 %
		Leverage ratio		
161,905	178,219	Balance sheet items	256,978	230,048
6,830	6,190	Off-balance sheet items	7,514	7,897
-851	-606	Regulatory adjustments	-1,577	-1,503
167,885	183,803	Calculation basis for leverage ratio	262,915	236,441
15,747	16,410	Core capital	18,636	17,742
<b>9.4 %</b>	<b>8.9 %</b>	<b>Leverage Ratio</b>	<b>7.1 %</b>	<b>7.5 %</b>

## Effect as at 31 December 2019 on the adopted application of net profit, as revised:

	31 Dec 2019	
	Parent Bank	Group
Common equity Tier 1 capital	14,525	16,133
Tier 1 capital	16,051	18,045
Total eligible capital	17,673	20,158
Common equity Tier 1 capital ratio	18.9 %	17.5 %
Tier 1 capital ratio	20.9 %	19.6 %
Capital ratio	23.0 %	21.9 %
Leverage Ratio	9.6 %	7.6 %