



Individual Solvency Need

Nordea Bank Danmark Group
30 September 2015

1 Introduction

This report presents the individual solvency need (tilstrækkelig basiskapital og solvensbehov for pengeinstitutter) for the Nordea Bank Danmark Group and its legal entities, Nordea Bank Danmark A/S and Nordea Kredit Realkreditaktieselskab. The purpose of this report is to fulfil external disclosure requirements regarding the solvency need according to EU regulation 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending regulation (EU) no 648/2012 and the Danish Financial Business Act (Lov om finansiel virksomhed jf. lovbekendtgørelse nr. 182 af 18. februar 2015) and Danish Executive Order no. 295 (27 March 2014) "Bekendtgørelse om opgørelse af risikoeksponeringer, kapitalgrundlag og solvensbehov". An update of the individual solvency need is published each quarter and is available on Nordea's Investor Relations website (nordea.com/ir) and links can be found on each legal entity's website. Details about the Nordea Bank Danmark Group's risk profile and key exposures are available in the annually disclosed Capital and Risk Management (Pillar 3) report for the Nordea Bank Danmark Group, also available on Nordea's Investor Relations website. Reference to the individual solvency need reporting is made in the annual report and the interim report for Nordea Bank Danmark A/S and Nordea Kredit Realkreditaktieselskab.

The Internal Capital Adequacy Assessment Process (ICAAP) reports for the Nordea Bank Danmark Group and Nordea Kredit Realkreditaktieselskab are produced at least annually. The reports are approved by the Board of Directors and presented to the Financial Supervisory Authority.

1.1 Main conclusions

- Outcome from the Supervisory Review and Evaluation Process (SREP) is now finalised and has led to a increase in the individual solvency need for the Nordea Bank Danmark Group from 10.8% to 13.7%, for Nordea Bank Danmark A/S from 10.8% to 12.5% and for Nordea Kredit Realkreditaktieselskab from 10.0% to 11.4%.
- The increased requirements mainly relate to add-ons due to SREP for inadequate second line of defence and its involvement in the governance of the IRB system and modelling. Included is also an add-on for operational risk from inspections relating to IT and key processes.
- The bank acknowledges the deficiencies and has already started to implement mitigating actions. The ambition is that these mitigations to a high degree will be in place by the first quarter 2016. It is then up to the college of supervisors to decide when the add-ons will be removed.
- The Nordea Bank Danmark Group and its individual legal entities are well capitalised at end-Q3 2015 and have access to available capital from Nordea Bank AB (publ), the parent company of the Nordea Bank Danmark Group, if necessary.
- The CET1 ratio for the Nordea Bank Danmark Group was 14.3% (Q2 2015: 15.0%).
- The Nordea Bank Danmark Group and its legal entities conduct capital adequacy stress testing in collaboration with the Nordea Group to ensure that adequate capital is available within the Nordea Bank Danmark Group and its parent company in the event of, for instance, severe credit losses or

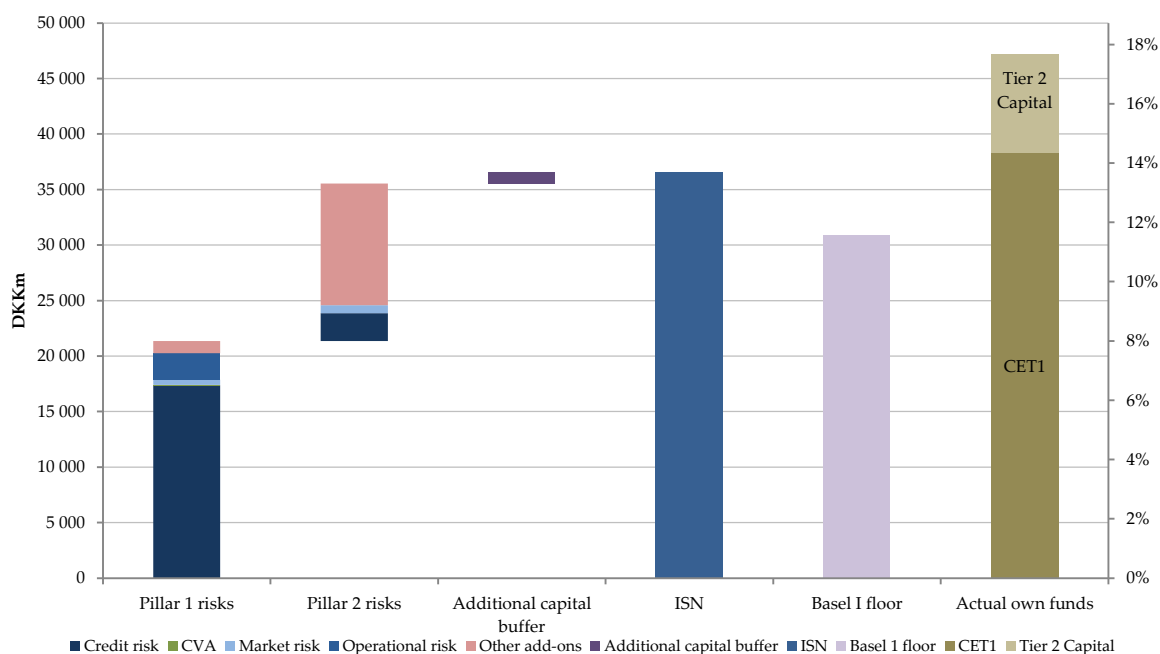
changes in regulatory capital requirements. Stress testing is also made using Finanstilsynets scenarios and methods.

- Nordea Bank Danmark has been appointed as being a systemically important financial institution (SIFI) in Denmark. This will require Nordea Bank Danmark to hold a 2% SIFI buffer (SRB buffer) for Nordea Bank Danmark A/S, Nordea Kredit Realkreditaktieselskab and the Nordea Bank Danmark Group. Due to the transition rule the actual buffer will be 0.4% in 2015. The buffer has to be applied to all exposure – both domestic and international and has to be fulfilled with common equity tier 1 instruments.

2 Definition of the individual solvency need

The definition of the individual solvency need and changes in methodology are described below.

Figure 1 Individual solvency need, capital constraints and actual capital at end-Q3 2015 for the NBD Group



The Nordea Bank Danmark Group and its legal entities use a Pillar 1 plus Pillar 2 approach in calculating the individual solvency need. Each component and its capital requirement are shown graphically for the Nordea Bank Danmark Group in Figure 1 above. This methodology uses the Pillar 1 capital requirements for credit risk, Credit Value Adjustment (CVA), market risk and operational risk as outlined in the Capital Requirements Regulation (CRR) as the starting point for its risk assessment. For each of these types, the risk is measured solely according to models and processes approved by the Financial Supervisory Authority for use in the calculation of legal capital requirements.

In addition, Pillar 2 risks, i.e. risks not included in the CRR or adequately covered, are considered – specifically concentration risk, interest rate risk in the banking book, market risk in internal defined pension plans, real estate risk and business risk.

The concentration risk for the Nordea Bank Danmark Group is calculated on a stand-alone basis by scaling the Nordea Group allocated concentration risk with a factor of 5.1. The scaling factor adjust the difference between the concentration risk of Nordea Bank Danmark within the Nordea Group and the concentration risk calculated for the Nordea Bank Danmark Group as a stand-alone entity using the Swedish FSAs concentration risk model.

Also included in the Pillar 2 requirement are a number of temporary capital add-ons for changes pending on approvals by FSAs and other add-ons of which some are related to the SREP.

There are two add-ons pending approvals. The first relates to a credit process change that was implemented in Q4 2012. Household customers with OEI and without individually assessed provision have since then been classified as non-defaulted as opposed to previously. The Danish Financial Supervisory Authority has required Nordea Bank Danmark A/S to allocate a temporary capital buffer, identical to the decrease in Risk Exposure Amount (REA), netted with reversals of capital shortfall as long as the approval process for the above mentioned change is ongoing. In Q3 2015 this add-on amounted to DKK 1,271m. The second add-on pending on approvals relates to changes made in the Danish scorecards not yet implemented in the Pillar 1 framework. This add-on amounts to DKK 164m.

There are three other add-ons, the first reflect that the current average Actual Default Frequency (ADF) exceeds the Probability of Default (PD) used in the Pillar 1 capital requirements for the IRB corporate and institutions portfolio. This capital add-on is 11.5% of the credit risk Pillar 1 capital requirement for the IRB corporate and institutions portfolio. In Q3 2015 this capital add-on amounted to DKK 1,188m.

The second reflects the risk of late registration of OEI in the Household portfolio and amounts to DKK 200m. A capital add-on reflecting this risk has been included for a few years but the add-on has been reduced as the number of unidentified OEI customers has been very low in the recently reviewed branch regions.

The third reflects the increased requirements in the SREP which relates to inadequate second line of defence and its involvement in the governance of the IRB system and modelling. Included is also an add-on for operational risk from inspections relating to IT and key processes. In total the add-on amounts to DKK 6,973m. Part of the adjustments that will be made due to the SREP is reversal of changes made in Pillar 1 REA. Before the changes are in effect, and are included in the relevant risk measure, these are reported as other risks in Pillar 1.

Finally, a temporary capital allocation is designated to provide buffers above current capital requirements in the event of unexpected changes to the capital base and/or risk exposure amount, as well as a precautionary action to compensate for the continuation of slow economic growth and uncertain macro environment causing uncertainty regarding the future risk picture. To reflect the current conditions in the agricultural sector and low interest rates impact on customers holding swap contracts, part of this additional buffer has been earmarked as specific capital add-ons to cover these specific credit risks.

For the Nordea Bank Danmark Group and Nordea Bank Danmark A/S, the general management buffer is the difference between the measured Pillar 1 and Pillar 2 risks (including the temporary allocations) and the individual solvency need. The individual solvency need before management buffer of 13.3% for the Nordea Bank Danmark Group allows for an internal buffer at end-Q3 of 39 bps, which amounts to DKK 1,044m. For Nordea Kredit Realkreditaktieselskab the buffer is the difference between the measured Pillar 1 and Pillar 2 risks and the 11.4% individual solvency need, which amounts to DKK 297m.

In addition to the individual solvency need, there are regulatory capital constraints related to large exposures and the Basel I floor. At end-Q3 2015, the Basel I floor is a constraint for Nordea Kredit Realkreditaktieselskab and increase the capital requirement by DKK 5,936m.

3 Individual solvency need and own funds

3.1 Individual solvency need

The individual solvency need for the Nordea Bank Danmark Group and its legal entities at end-Q3 2015 is presented in detail in the table 1 and 2 below.

Table 1 Individual solvency need for the Nordea Bank Danmark Group and its legal entities at end-Q3 2015

Capital requirements DKKmn	Nordea Bank Danmark Group	Nordea Bank Danmark A/S	Nordea Kredit Realkredit aktieselskab
Credit risk	17 389	16 667	4 999
- of which counterparty credit risk	23	23	0
<i>Credit risks measured by the IRB approach</i>	<i>15 996</i>	<i>11 991</i>	<i>4 993</i>
- of which corporate	9 876	6 946	2 441
- of which institutions	452	454	0
- of which retail	5 430	4 404	2 544
- of which other	238	187	9
<i>Credit risks measured by the standardised approach</i>	<i>1 393</i>	<i>4 676</i>	<i>6</i>
- of which corporate	241	1 519	
- of which institutions	122	97	0
- of which retail	397	0	
- of which equity	21	2 442	1
- other items	612	618	5
Market risk	475	322	0
- of which trading book, internal approach	269	269	
- of which trading book, standardised approach	163	12	0
- of which banking book, standardised approach	43	41	0
Operational risk	2 396	2 206	256
Credit Value Adjustment Risk (CVA)	5	5	
Other risks	1 099	859	245
Pillar 2 Credit risk	2 497	532	144
- of which concentration risk	2 247	282	144
- of which for increased risk for customers with swap contacts	100	100	
- of which for increased risk for customers in agriculture sector	150	150	
Pillar 2 Market risk	717	717	32
- of which IRR in the banking book	629	629	32
- of which real estate risk	0	0	0
- of which pension plans	88	88	0
Pillar 2 Business risk	1 170	1 125	20
Pillar 2 Add-ons for changes pending on approvals	1 435	1 117	317
- of which OEI adjustment	1 271	953	317
- of which new scorecards	164	164	
Pillar 2 Other add-ons	8 361	6 670	1 527
- of which corporate and bank ADF/PD adaption	1 188	851	281
- of which late registration in household portfolio	200	200	0
- of which due to SREP	6 973	5 619	1 246
Additional internal buffer	1 044	1 123	297
Individual solvency need (adequate own funds)	36 587	31 344	7 836
Adjusted individual solvency need (adjusted adequate own funds)	36 587	31 344	7 836
Additional regulatory capital requirement due to transition rules	0	0	5 936
Capital requirement according to transition rules	36 587	31 344	13 772

Table 2 Key solvency figures for the Nordea Bank Danmark Group and its legal entities at Q3 2015

DKKm	Nordea Bank		Nordea Kredit Realkreditaktieselskab
	Danmark Group	Nordea Bank Danmark A/S	
Individual solvency need pct. for Credit risk	7.4%	6.9%	7.5%
Individual solvency need pct. for Market risk	0.4%	0.4%	0.0%
Individual solvency need pct. for Operational risk	0.9%	0.9%	0.4%
Individual solvency need pct. for CVA	0.0%	0.0%	0.0%
Individual solvency need pct. for Other risks	4.9%	4.3%	3.5%
Individual solvency need pct. incl. additional internal buffers	13.7%	12.5%	11.4%
Individual solvency need pct. excl. additional internal buffers	13.3%	12.1%	11.0%
Common Equity Tier 1 Capital	38 299	37 123	18 622
Tier 1 Capital	38 299	37 123	18 622
Own funds	47 219	46 160	18 622
Total Risk Exposure Amount	267 055	250 750	68 740
Total Risk Exposure Amount incl Basel 1 floor	386 616	319 322	172 152
Common Equity Tier 1 ratio	14.3%	14.8%	27.1%
Tier 1 ratio	14.3%	14.8%	27.1%
Total capital ratio	17.7%	18.4%	27.1%
Basel 1 floor Common Equity Tier 1 ratio	9.9%	11.6%	10.8%
Basel 1 floor Funds incl transition rules	12.2%	14.5%	10.8%

3.2 Own funds

The own funds for the Nordea Bank Danmark Group and its legal entities at end-Q3 2015 is presented in detail in table 3 below.

Table 3 Own funds excluding profit for the Nordea Bank Danmark Group and its legal entities at end-Q3 2015

DKKm	Nordea Bank		Nordea Kredit Realkreditaktieselskab
	Danmark Group	Danmark A/S	
Own funds			
Paid up instruments	5 000	5 000	1 717
Share premium	0	0	0
Capital instruments eligible as CET 1 capital	5 000	5 000	1 717
Retained earnings/other reserves/accumulated other comprehensive income	34 095	34 095	17 120
Other CET1 instruments	1 255	0	0
Income (positive/negative) from current year	3 308	3 308	1 024
Common Equity Tier 1 capital before deductions	43 658	42 403	19 861
Deferred tax assets	0	0	0
Proposed/actual dividend	-3 308	-3 308	-1 024
Goodwill and other intangible assets	-1 824	-1 790	0
Deductions for defined pension fund asset	-73	-73	0
IRB provisions excess (+) / shortfall (-)	-43	0	-214
Other items, net	-111	-109	-1
Deductions from Common Equity Tier 1 capital	-5 359	-5 279	-1 239
Additional Tier 1 Capital	0	0	0
Tier 1 capital (net after deduction)	38 299	37 124	18 622
-of which additional Tier 1 capital	0	0	0
Capital instruments and subordinated loans eligible as Tier 2 capital	8 939	8 939	0
Other additional Tier 2 instruments	0	0	0
Tier 2 capital (before deductions)	8 939	8 939	0
IRB provisions excess (+) / shortfall (-)	-18	98	0
Tier 2 capital (net after deductions)	8 921	9 037	0
Participations hold in insurance undert., reinsurance	0	0	0
Pension assets in excess of related liabilities	0	0	0
Total own funds	47 220	46 161	18 622