

# CREDIT OPINION

5 August 2021

# **Update**



Rate this Research

#### RATINGS

#### SpareBank 1 SMN

Domicile	Trondheim, Norway
Long Term CRR	A1
Туре	LT Counterparty Risk Rating - Fgn Curr
Outlook	Not Assigned
Long Term Debt	A1
Туре	Senior Unsecured - Fgn Curr
Outlook	Stable
Long Term Deposit	A1
Туре	LT Bank Deposits - Fgn Curr
Outlook	Stable

Please see the <u>ratings section</u> at the end of this report for more information. The ratings and outlook shown reflect information as of the publication date.

#### Contacts

Katarzyna +44.20.7772.1047 Szymanska Associate Analyst

katarzyna.szymanska@moodys.com

Simon James Robin +44 207 772 5347 Ainsworth

Associate Managing Director simon.ainsworth@moodys.com

Sean Marion +44.20.7772.1056

MD-Financial Institutions sean.marion@moodys.com

Effie Tsotsani +44.20.7772.1712

AVP-Analyst

effie.tsotsani@moodys.com

# SpareBank 1 SMN

Update to credit analysis

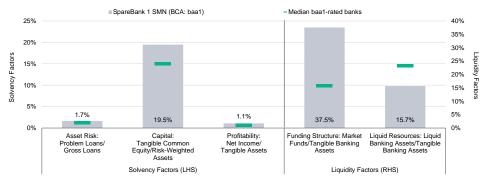
# Summary

<u>SpareBank 1 SMN</u>'s long-term deposit and senior unsecured debt ratings of A1 take into account the bank's baseline credit assessment (BCA) of baa1, but also our loss given failure (LGF) analysis which results in three notches of rating uplift from its BCA.

SpareBank 1 SMN's BCA of baa1 reflects its resilience through the economic cycle, coupled with Moody's expectation of steady profitability and low levels of asset risk. This is supported by our view of the bank's strong retail franchise in central Norway, which delivers robust core earnings and its solid capital metrics with a CET 1 capital ratio of 18.0% at end-March 2021. These are balanced against the bank's high reliance on market funding, a common feature among all local savings banks, its relatively narrow geographic focus and downside credit risks stemming from its oil-related exposures. Nonetheless, the bank has been able to maintain sound asset quality metrics with stage 3 loans at 1.7% of total gross loans (including covered bond loans) in March 2021, at similar level as in March 2020 (1.6%), despite the recent coronavirus pandemic and oil price drop.

The bank's A1 deposit and senior unsecured debt ratings take into account our forward-looking LGF analysis taking into consideration the MREL-eligible securities that it is likely to issue by the end of 2023, with NOK2.5 billion of senior non-preferred (SNP) debt issued so far. This results in three notches of rating uplift from the bank's BCA.

Exhibit 1
Rating Scorecard - Key Financial Ratios



These are our Banks methodology scorecard ratios. Asset risk and profitability reflect the weaker of either the three-year average and latest annual figure. Capital is the latest reported figure. Funding structure and liquid resources reflect the latest fiscal year end figures.

Source: Moody's Financial Metrics

# **Credit strengths**

- » SpareBank 1 SMN's BCA is supported by its Very Strong- Macro Profile
- » Solid capital metrics provide a buffer against potential future credit losses
- » Resilient earnings benefit from a strong regional retail franchise
- » Large volume of deposits and junior debt resulting in deposit ratings benefiting from a very low loss-given-failure rate

# **Credit challenges**

- » Credit concentrations from operating in more limited geographic areas than many international peers
- » Downside risks from the bank's oil-related exposure, although problem loans are low
- » Dependence on market funding renders it vulnerable to fluctuations in investor sentiment, but liquidity is comfortable

# **Outlook**

The stable outlook on the bank's deposit and debt ratings reflect the robust positioning, when compared to local and international peers. In addition, the stable outlook also reflects the bank's resilient core earnings, loan growth and asset quality through the cycle balanced by challenges induced by the coronavirus and reduced oil prices.

# Factors that could lead to an upgrade

Over time, upward rating pressure could develop if the bank demonstrates (1) it can effectively manage with low credit losses its exposure to more volatile sectors such as commercial real estate and oil/offshore; (2) strong asset quality with a low level of problem loans and credit impairments relative to its similarly-rated peers; (3) strong recurring earnings generation without an increase in its risk profile, combined with an improved non-interest income; and (4) continued good access to capital markets combined with strong liquidity.

#### Factors that could lead to a downgrade

Future downward rating pressure would emerge if (1) SpareBank 1 SMN's problem loan ratio increases to levels significantly above its similarly-rated peers; (2) its profitability deteriorates from weakening revenues or high credit costs; (3) the bank fails to sustain its leading market position in its home region; (4) the macroeconomic environment deteriorates more than currently anticipated, leading to a lower Macro Profile; (5) a lower than expected issue of junior securities, including senior non-preferred (SNP) debt as a result of the implementation of BRRD2, which results in a lower rating uplift in our Advanced forward-looking LGF analysis.

This publication does not announce a credit rating action. For any credit ratings referenced in this publication, please see the ratings tab on the issuer/entity page on www.moodys.com for the most updated credit rating action information and rating history.

# **Key indicators**

Exhibit 2
SpareBank 1 SMN (Consolidated Financials) [1]

	03-21 <sup>2</sup>	12-20 <sup>2</sup>	12-19 <sup>2</sup>	12-18 <sup>2</sup>	12-17 <sup>2</sup>	CAGR/Avg. <sup>3</sup>
Total Assets (NOK Billion)	241.7	236.1	208.2	199.9	188.6	7.9 <sup>4</sup>
Total Assets (USD Million)	28,313.3	27,571.4	23,689.0	23,080.4	23,052.1	6.5 <sup>4</sup>
Tangible Common Equity (NOK Billion)	18.4	18.0	17.3	16.0	15.0	6.5 <sup>4</sup>
Tangible Common Equity (USD Million)	2,160.5	2,106.3	1,969.2	1,847.6	1,838.0	5.1 <sup>4</sup>
Problem Loans / Gross Loans (%)	1.7	1.2	1.3	1.0	1.0	1.2 <sup>5</sup>
Tangible Common Equity / Risk Weighted Assets (%)	19.5	19.4	18.8	15.8	15.9	17.9 <sup>6</sup>
Problem Loans / (Tangible Common Equity + Loan Loss Reserve) (%)	15.4	11.5	11.5	10.0	9.1	11.5 <sup>5</sup>
Net Interest Margin (%)	1.3	1.4	1.5	1.5	1.5	1.4 <sup>5</sup>
PPI / Average RWA (%)	3.4	2.7	2.4	2.3	2.3	2.6 <sup>6</sup>
Net Income / Tangible Assets (%)	1.2	0.8	1.2	1.0	1.0	1.1 <sup>5</sup>
Cost / Income Ratio (%)	50.0	53.3	53.7	53.8	52.5	52.6 <sup>5</sup>
Market Funds / Tangible Banking Assets (%)	36.6	37.5	36.7	38.1	38.7	37.5 <sup>5</sup>
Liquid Banking Assets / Tangible Banking Assets (%)	17.6	15.7	13.9	14.1	15.5	15.4 <sup>5</sup>
Gross Loans / Due to Customers (%)	181.0	187.5	195.3	198.9	194.5	191.4 <sup>5</sup>

<sup>[1]</sup> All figures and ratios are adjusted using Moody's standard adjustments. [2] Basel III - fully loaded or transitional phase-in; IFRS. [3] May include rounding differences because of the scale of reported amounts. [4] Compound annual growth rate (%) based on the periods for the latest accounting regime. [5] Simple average of periods for the latest accounting regime. [6] Simple average of Basel III periods.

Sources: Moody's Investors Service and company filings

#### **Profile**

SpareBank 1 SMN is a leading regional savings bank in central Norway. It provides a range of retail banking, corporate banking and capital markets related products and services. Furthermore, through its subsidiaries and associated companies, it offers real estate agency, investment, asset management and other financial services. As of end-March 2021, its consolidated assets (including loans transferred to covered bond companies) totaled NOK242 billion (€24 billion).

# **Recent developments**

Recovery solidifies in the US and Europe, while emerging markets face multiple risks. Disparities in controlling the COVID-19 pandemic and in levels of policy support are resulting in an asynchronous global economic recovery. Although we expect significantly stronger global economic activity this year than last year, the recovery is multispeed and diverging across and within advanced and emerging market countries. But the effects on individual businesses, sectors and regions continue to be uneven, and the COVID-19 crisis will endure as a challenge to the world's economies.

Downside risks to our forecasts for advanced economies have receded but timing and pace of expansion is closely tied to policy support and continued progress with vaccinations. Progress of vaccinations in Norway, broadly in line with the EU, appears close to breaking the cycle of infections, notwithstanding risks of new variants. We expect the Norwegian mainland economy (excluding any oil-related activity) to rebound by 3.5% in 2021 after contracting by 2.5% in 2020. Unemployment, which peaked in March 2020 at 10.6% according to the Norwegian Labour and Welfare Administration, has declined to 4.0% as of April 2021.

In April we changed our outlook on the Norwegian banking system to stable from negative. This reflects our expectation that the Norwegian economy will recover strongly in 2021 after a coronavirus-induced downturn last year, exacerbated by a fall in oil prices. Norwegian banks will maintain good asset quality, as well as strong capitalisation and solid profitability. Their dependence on market funding will remain high, although offset by ample liquidity.

#### **Detailed credit considerations**

# Norway's 'Very Strong-' Macro Profile remains supportive towards the bank's stand alone credit profile

Norway's operating environment is improving supported by a strong economic recovery in 2021 after the coronavirus-induced downturn last year. The anticipated pace of recovery, faster than that of most European peers, reflects a combination of improving consumer demand as lockdown restrictions ease, continued government support, and rising oil prices.

SpareBank 1 SMN operates only in Norway and thus its operating environment is reflected through the 'Very Strong -' Macro Profile we assign for Norway. Norwegian banks benefit from operating in a wealthy and developed country with very high economic, institutional and government financial strength, as well as a very low susceptibility to event risk. Norway has a diversified and growing economy, which demonstrated resilience to the last weakening in the oil sector in 2014-15.

The main risks to the banking system stem from the high level of household debt, elevated real estate prices and domestic banks' extensive use of market funding. However, these risks are mitigated by the strength of households' ability to service debt, banks' adequate capitalisation and the relatively small size of the banking system compared with the total size of the economy.

Nonetheless, we expect the Norwegian mainland economy (excluding any oil-related activity) rebound in real GDP to 3.2% in 2021 as the vaccine rollout progresses will allow the government to gradually phaseout some of these temporary measures and narrow the structural non-oil deficit towards 3% of the GPFG in the medium term. Unemployment peaked in March 2020 at 10.6% according to the Norwegian Labour and Welfare administration and most recently stood at 3.3% as of 31 May 2021, although declined more recently, combined with the low economic activity it will inevitably impact banks' credit growth, asset quality and earnings.

#### Downside risks from the bank's oil-related exposure, although problem loans are low

SpareBank 1 SMN's stage 3 gross loans as a percentage of total loans, including loans transferred to the jointly-owned and non-consolidated SpareBank 1 Boligkreditt and Naeringskreditt) was at 1.7% in March 2021, up from 1.2% as of year-end 2020 and 1.6% primarily due to a change in the definition of default in 2021. The bank's problem loans mainly originate from the challenges that it faces in its oil and offshore sector exposures as well as other oil dependent industries and services, which face difficulties mainly due to drop in oil price since the coronavirus outbreak and also due to some historical overcapacity of older offshore service vessels (OSVs).

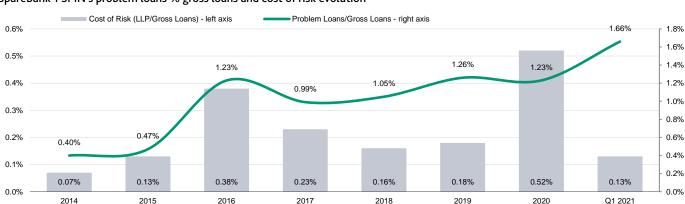


Exhibit 3

SpareBank 1 SMN's problem loans % gross loans and cost of risk evolution

Note: Gross loans include covered bond loans. Source: Moody's Financial Metrics and bank's reports

We note that the bank's exposure at default (EAD) to oil-related activity accounted for around NOK4.4 billion (including around NOK3.6 billion of corporate loans) at end-March 2021, which comprised around 2.2% of the bank's total credit risk (including loans transferred to the covered bond companies), while total write-downs related to the offshore portfolio amounted to 19.7% of the overall EAD as of March 2021. We also note that some of these borrowers fall within the bank's top 20 group loans, elevating the bank's credit risk profile. At end-March 2021, the bank's exposure to the sub-sea vessel segment constituted around 51% of the total exposure to the offshore industry.

We understand that any restructurings are time consuming since the companies' debt structure involves several banks with special lending facilities along with bond debt outstanding. The solutions recommended include injection of fresh equity by shareholders or new investors, deferment of installment payments and renegotiation/extinction/conversion of bond debt. SpareBank 1 SMN booked credit losses of NOK59 million in the first quarter of 2021, of which NOK56 million related to the offshore industry. We believe that OSV exposures, despite restructurings in recent years, continue to pose downside risks for the bank.

Looking at the coronavirus-related defaults and impairments, we understand that the negative effects on the bank's borrowers have moderated and that the bank has received significantly less applications for payment holidays and deferrals compared to other European banks.

However, the bank's overall asset quality is favourable and comparable to its similarly-rated peers both locally and internationally. SpareBank 1 SMN's well-diversified loan book (including loans transferred to SpareBank 1 Boligkreditt and SpareBank 1 Naeringskreditt), of which around 68% comprises loans to retail customers (mainly in the form of mortgages), and strong risk management practices counterbalance to some degree any negative effects from its oil-related exposures. The strong performance of the bank's retail banking business continues in the first quarter of 2021, with only NOK5 million of impairments (out of the NOK59 million in total) linked to retail customers (including the bank's finance subsidiary).

Our assigned asset risk score incorporates negative adjustments, indicating the downside risks the bank still faces as stated above. In addition, our adjustments take into account the bank's relatively limited geographical diversification, but also its vulnerability to a potential material reduction in property prices given its exposure to commercial real-estate (9.0% of total gross loans at end-March 2021) and residential mortgages (68% of total gross loans at end-March 2021).

# Solid capital metrics provide a buffer against potential future credit losses

SpareBank 1 SMN's ratings are supported by its solid capital position, with its common equity Tier 1 (CET1) ratio of 18.0% at end-March 2021 compared to 18.3% as of year-end 2020 and 16.3% as of end-March 2020. In response to the global coronavirus outbreak and resulting economic stress, the Norwegian FSA has revised banks' capital requirements during the first quarter of 2020. Accordingly, the countercyclical capital buffer requirement has been lowered by 150 basis points to allow more flexibility, while banks were requested to reconsider their dividend payments for 2019. However, However, based on the Ministry of Finance's proposal to neutralise the positive RWAs impact from the transposition of the CRD IV directive into Norwegian law the systemic risk buffer was increased by 1.5% from year-end 2020. Furthermore, the Ministry of Finance has decided that the countercyclical capital buffer requirement for banks shall be increased by 50 basis points to 1.5 percent from 30 June 2022.

We note that the FSA has set a Pillar 2 requirement of 1.9% with effect from first quarter of 2019 for SpareBank 1 SMN, which combined with other regulatory requirements result in a CET1 minimum of 14.4% (including a systemic risk buffer of 4.5% for IRB banks). The bank aims for a management buffer of 1% above its regulatory requirement (see Exhibit 4).

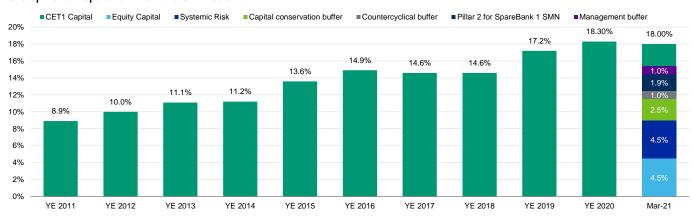


Exhibit 4

Development in SpareBank 1 SMN's CET1 ratio

Source: Source: Company reports and presentations

The bank's tangible common equity has strengthened in recent years, as good earnings generation has supported its capital levels. We note that SpareBank 1 SMN's hybrid debt (NOK1.2 billion) and subordinated debt (NOK1.8 billion) contributed to the strong Tier 1 ratio of 19.7% and overall capital adequacy ratio of 21.9% at end-March 2021. Such solid capital levels provide a buffer against potential future credit losses, driving the bank's BCA and ratings.

Going forward, we expect the bank to maintain a payout ratio of around 50%, and retain sufficient profit in order to continue meeting its internal CET1 targets. Our assigned capital score reflects this strength, as well as the bank's leverage ratio of 7.0% at end-March 2021, which although high by international standards it is marginally lower than the average for similarly-rated local peers.

# Resilient earnings benefit from a strong regional retail franchise

In response to the economic stress from the coronavirus outbreak the Norges Bank has carried out three rate cuts totaling 150 basis points since March 2020, while prior to this period the key policy rate was on a rising trend. Low loan rates (interest rate adjustment was implemented quicker than the usual 6 weeks notice) coupled with an already fierce competition among Norwegian banks will put pressure on SpareBank 1 SMN's net interest margin. However, we expect the bank's margins to stabilise in the second half of the year, despite the intense competition, as Norges Bank indicated that it will start increasing the reference rate in September 2021.

SpareBank 1 SMN's reported net profit for the first quarter of 2021 improved significantly to NOK768 million, up from NOK290 million in the same period in 2020 when the pandemic had strongest effect on financial result. The improved net profit was mainly driven by lower loan losses on the back of solid economic recovery that led to significant reduction in credit costs from the peak in 2020 and higher commission and other income neutralising the effect of lower net interest income as well as higher return on financial investments which were a source of losses in March 2020. As a result the bank's reported return on equity (RoE) was 14.8% at end March 2021 compared to 5.7% a year earlier.

In the first quarter of 2021, the bank recorded just NOK59 million in loan losses, compared with NOK308 million a year earlier, which corresponds to annualised credit losses of 0.13% of gross loans (including transferred loans) down from 0.74% the year before.

SpareBank 1 SMN's reported net interest income declined year-on-year by around 6% as of March 2021, on the back of margin pressure. After a period of rising rates during 2019, net interest income was affected in 2020 by the sharp fall in key policy rate from Norges Bank.

The bank reported a cost-to-income ratio of 46% as of March 2021 compared to 52% in the same period in 2020. Operating costs for the group were kept broadly in line over past 12 months, although we note that the bank is committing substantial digitalisation investments as a step towards enhancing the customer experience and improving efficiencies.

Our profitability score for the bank takes into account our adjusted return on tangible assets (including assets transferred to covered bond companies) that was at 1.25% in the first quarter of 2021 (see Exhibit 5), but also our forward-looking view on the bank's resilient recurring pre-provision earnings. Despite lower interest rates and intense competition for retail mortgages, we expect the bank to maintain its satisfactory profitability metrics in the coming 12-18 months.

Exhibit 5
Moody's adjusted Net income / Tangible assets ratio evolution (including assets transferred to covered bond companies)



Source: Moody's Financial Metrics

#### Dependence on market funding renders the bank vulnerable to fluctuations in investor sentiment...

SpareBank 1 SMN's deposits accounted for around 46% of total liabilities (including covered bonds issued through the covered bond companies) at end-March 2021, which have proven to be resilient and growing over many years. The year-on-year growth in total deposits was a high 16% at end-March 2021, with retail deposits increasing by a high 11.1% and corporate deposits by even 20% on an annual basis. Such high deposit growth was driven largely by the pandemic on various lockdown measures introduced by the authorities throughout 2020 and 2021. Retail deposits, which we consider to be more stable, represented 40% of the bank's total deposits at the end-March 2021.

SpareBank 1 SMN uses covered bonds as an important funding source, which is done off-balance sheet through specialised companies it jointly owns together with other savings banks of the SpareBank 1 Alliance (SpareBank 1 Boligkreditt for residential mortgages and SpareBank 1 Næringskreditt for commercial mortgages). At end-March 2021 the bank had transferred loans worth NOK47.9 billion to these vehicles, or around a quarter of its gross loan book including the transferred loans. While we view positively the diversification benefit of covered bond funding, its extensive use increases the amount of pledged assets unavailable for unsecured bondholders, including depositors in liquidation.

We reflect the relative stability of covered bonds compared to unsecured market funding through a standard adjustment in our scorecard. Our Funding Structure Score reflects our view that SpareBank 1 SMN's reliance on market funding - a common feature at Nordic banks - is of sufficient scale (market funds comprised around 37% of tangible banking assets at end-March 2021) to represent a source of vulnerability because, in times of market stress, market funding can become more expensive and/or restricted.

#### ...although liquidity is comfortable

Risk related to market funding is mitigated somewhat as SpareBank 1 SMN maintains a sizeable liquidity buffer and funding that can cover needs for three years without any new external financing. The bank's liquid assets as a percent of total banking assets (a Moody's scorecard ratio) amounted to a high 17.6% at end-March 2021. We also note that this ratio does not take into account the liquid assets held by SpareBank 1 Boligkreditt and SpareBank 1 Næringskreditt, the bank's covered bond vehicles.

The liquid reserves mainly consists of covered bonds from other Norwegian banks; most of it is useable as collateral for loans from Norges Bank, municipal bonds and balances with central banks. Accordingly, we believe that the covered bond holdings increase the interconnection among local banks, a common feature among all rated banks, which also raises the vulnerability and contagion risks of the banking system. SpareBank 1 SMN reported a commendable liquidity coverage ratio (LCR) of 190% at end-March 2021, compared to 100% requirement.

# **Environmental, social and governance considerations**

In line with our general view of the banking sector, SpareBank 1 SMN has low exposure to Environmental risks and moderate exposure to Social risks. See our <a href="Environmental">Environmental</a> and <a href="Social">Social</a> risk heatmaps for further information.

SMN's exposure to oil and off-shore sector is a source of environmental risk for the bank in the face of eventual transition to low-carbon economy. However, the bank's exposure is relatively low at around 2.6% of the bank's total portfolio (including loans transferred to the covered bond companies), and considered manageable. Furthermore, Norway, similarly to the European Union, has policies in place that ensure new housing constructed is energy-efficient, which enables banks to gather mortgages for asset pools for green bond issuances. Such policies also help limit environmental risks for Norwegian banks with large retail exposure and primarily mortgage lending activity. SpareBank 1 SMN issued its first green covered bond worth €500 million in September 2019 with a seven year term and capital earmarked for green loan portfolios, including sustainable fisheries and fish farming. In addition, we note that in September 2019 SpareBank 1 SMN was one of the five Norwegian banks that signed the UN's principles for responsible banking, aiming to transition to a low-emision economy and meet UN's sustainability goals. In December new products were launched for retail: green residential loans, green loans for energy projects and green consumer loans.

We believe banks face moderate social risks. The most relevant social risks for banks arise from the way they interact with their customers. Social risks are particularly high in the area of data security and customer privacy, which is partly mitigated by sizeable technology investments and banks' long track record of handling sensitive client data. In addition, we regard the coronavirus outbreak as a social risk under our ESG framework, given the substantial implications for public health and safety. See our social risk heat map for further information.

Governance is highly relevant for SpareBank 1 SMN, as it is to all players in the banking industry. Corporate governance weaknesses can lead to a deterioration in a company's credit quality, while governance strengths can benefit its credit profile. Corporate governance remains a key credit consideration and requires ongoing monitoring. However, we currently do not have any governance related concerns over SpareBank 1 SMN, noting the smooth transition at the top management with a new CEO (former CEO of SpareBank 1 Nord-Norge) taking over earlier in the year.

# Support and structural considerations

#### Loss Given Failure and additional notching

Norwegian banks are subject to the EU's Bank Recovery and Resolution Directive (BRRD). In our advanced LGF analysis, we assume residual tangible common equity of 3% and losses post-failure of 8% of tangible banking assets, a 25% run-off in "junior" wholesale deposits, a 5% run-off in preferred deposits, and assign a 25% probability to deposits being preferred to senior unsecured debt. These are in line with our standard assumptions.

For SpareBank 1 SMN's long term deposits and senior unsecured debt ratings, we consider the likely impact of loss-given-failure, reflecting the combination of debt and deposit volumes and the amount of debt subordinated to them. We also take into consideration the expected level of MREL eligible debt issuance of around NOK12 billion by the end of 2023. We note that the bank has already issued NOK2.5 billion of senior non-preferred (SNP) debt, which qualifies as MREL instrument. This has resulted in a Preliminary Rating Assessment of three notches above the BCA for the bank's deposit and senior unsecured ratings, reflecting very low loss-given-failure. For junior senior securities (SNP) issued by SpareBank 1 SMN, our LGF analysis indicates a moderate loss level, positioning the rating at the same level as its BCA (baa1).

We believe that there is a low likelihood that the implementation of revisions to the BRRD (BRRD2) in Norway will result in a significantly lower level of junior senior issuance by the bank. In particular the agency does not expect the application of the directive's subordination cap (equivalent to 27% of risk weighted assets) to significantly reduce the level of subordination for Norwegian banks currently in receipt of a recapitalisation requirement. This is because the framework includes a number of potential exceptions to the cap, particularly in the case of larger banks, or for those banks where there is an assumption that use of resolution funding would be required to facilitate resolution.

Accordingly, we expect the bank's funding plans to likely remain substantially unchanged and continue to be driven by the initial implementation of the BRRD rules. However, the ability of authorities to apply such exceptions to a broad range of banks remains untested, and clarity depends on the incorporation of BRRD2 in the EEA agreement, implementation in Norwegian law and finally

the setting of individual requirements by the Norwegian FSA (the resolution authority). Should the final implementation of BRRD2 result in lower subordination requirements for SpareBank 1 SMN, and therefore lower volumes of junior senior debt, this could lead to a negative rating action.

#### **Government support**

SpareBank 1 SMN has a well-established regional franchise in central Norway, where we estimate it commands market shares of around 22% for lending (including the loans transferred to covered bond companies), although its national market share is limited at around 4%. The implementation of BRRD framework in Norway on 01.01.2019, which is aligned with the EU's bank recovery and resolution directive, has caused us to revise our government support assumptions for the bank. In line with other banks under these frameworks, we recently changed our government support assumptions to low from moderate for debt and deposits, resulting in no additional notches of rating uplift above their PRA, positioning them at A1.

For junior securities, we consider that potential government support is low and therefore these ratings do not include any related uplift. Junior securities also include additional downward notching from the BCA, reflecting coupon suspension risk ahead of a potential failure.

#### **Counterparty Risk Assessment**

#### SpareBank 1 SMN's CR Assessment is A1(cr)/Prime-1(cr)

SpareBank 1 SMN's CR Assessment is positioned at A1(cr)/Prime-1(cr), three notches above the bank's adjusted BCA of baa1, based on the substantial cushion against default provided to the senior obligations represented by the CRA by subordinated instruments. The main difference with our Advanced LGF approach used to determine instrument ratings is that the CRA captures the probability of default on certain senior obligations, rather than expected loss, therefore we focus purely on subordination and take no account of the volume of the instrument class.

# **Counterparty Risk Ratings**

#### SpareBank 1 SMN's CRR's are A1/Prime-1

The CRR is positioned three notches above the adjusted BCA of baa1, reflecting the extremely low loss given failure from the high volume of instruments that are subordinated to CRR liabilities.

# Foreign currency deposit rating

SpareBank 1 SMN's foreign-currency deposit rating of A1 is unconstrained given that Norway has no country ceiling.

#### Foreign currency debt rating

SpareBank 1 SMN's senior unsecured foreign-currency debt rating of A1 is unconstrained given that Norway has no country ceiling.

# Rating methodology and scorecard factors

#### Exhibit 6

SpareBank 1 SMN

Macro Factors		
Weighted Macro Profile	Very	100%
	Strong -	

Factor	Historic	Initial	Expected	Assigned Score	Key driver #1	Key driver #2
Tactor	Ratio	Score	Trend	Assigned Score	Key dilvei #1	Key driver #2
Solvency						
Asset Risk						
Problem Loans / Gross Loans	1.7%	aa3	$\leftrightarrow$	baa1	Geographical concentration	Sector concentration
Capital						
Tangible Common Equity / Risk Weighted Assets (Basel III - transitional phase-in)	19.5%	aa1	$\leftrightarrow$	aa2	Risk-weighted capitalisation	
Profitability						
Net Income / Tangible Assets	1.1%	a2	$\leftrightarrow$	baa1	Expected trend	
Combined Solvency Score		aa3		a2		
Liquidity						
Funding Structure						
Market Funds / Tangible Banking Assets	37.5%	ba2	$\leftrightarrow$	ba2		
Liquid Resources						
Liquid Banking Assets / Tangible Banking Assets	15.7%	baa2	$\leftrightarrow$	baa2		
Combined Liquidity Score		ba1		ba1		
Financial Profile				baa1		
Qualitative Adjustments				Adjustment		
Business Diversification				0		
Opacity and Complexity				0		
Corporate Behavior				0		
Total Qualitative Adjustments				0		
Sovereign or Affiliate constraint				Aaa		
BCA Scorecard-indicated Outcome - Range				a3 - baa2		
Assigned BCA				baa1		
Affiliate Support notching	0					
Adjusted BCA		•		baa1		

Balance Sheet	in-scope	% in-scope	at-failure	% at-failure	
	(NOK Million)		(NOK Million)		
Other liabilities	81,235	33.7%	91,679	38.1%	
Deposits	102,390	42.5%	91,946	38.2%	
Preferred deposits	75,769	31.5%	71,980	29.9%	
Junior deposits	26,621	11.1%	19,966	8.3%	
Senior unsecured bank debt	44,388	18.4%	44,388	18.4%	
Junior senior unsecured bank debt	2,500	1.0%	2,500	1.0%	
Dated subordinated bank debt	1,793	0.7%	1,793	0.7%	
Preference shares (bank)	1,273	0.5%	1,273	0.5%	
Equity	7,224	3.0%	7,224	3.0%	
Total Tangible Banking Assets	240,803	100.0%	240,803	100.0%	

Debt Class	s De Jure waterfall De Facto		De Facto	waterfall	Not	ching	LGF	Assigned	Additional Preliminary	
	Instrument volume + subordinatio	ordinati	Instrument on volume + o subordinatio	ordination	De Jure	De Facto	Notching Guidance vs. Adjusted	LGF notching	Notching	Rating Assessment
Counterparty Risk Rating	32.0%	32.0%	32.0%	32.0%	3	3	<b>BCA</b> 3	3	0	a1
Counterparty Risk Assessment	32.0%	32.0%	32.0%	32.0%	3	3	3	3	0	a1 (cr)
Deposits	32.0%	5.3%	32.0%	23.7%	2	3	2	3	0	a1
Senior unsecured bank debt	32.0%	5.3%	23.7%	5.3%	2	2	2	3	0	a1
Junior senior unsecured bank debt	5.3%	4.3%	5.3%	4.3%	0	0	0	0	0	baa1
Dated subordinated bank debt	4.3%	3.5%	4.3%	3.5%	-1	-1	-1	-1	0	baa2

Instrument Class	Loss Given Failure notching	Additional notching	Preliminary Rating Assessment	Government Support notching	Local Currency Rating	Foreign Currency Rating
Counterparty Risk Rating	3	0	a1	0	A1	A1
Counterparty Risk Assessment	3	0	a1 (cr)	0	A1(cr)	
Deposits	3	0	a1	0	A1	A1
Senior unsecured bank debt	3	0	a1	0		A1
Junior senior unsecured bank debt	0	0	baa1	0	Baa1	
Dated subordinated bank debt	-1	0	baa2	0		Baa2 (hyb)

<sup>[1]</sup> Where dashes are shown for a particular factor (or sub-factor), the score is based on non-public information. Source: Moody's Investors Service

# **Ratings**

Exhibit 7

Category	Moody's Rating
SPAREBANK 1 SMN	
Outlook	Stable
Counterparty Risk Rating	A1/P-1
Bank Deposits	A1/P-1
Baseline Credit Assessment	baa1
Adjusted Baseline Credit Assessment	baa1
Counterparty Risk Assessment	A1(cr)/P-1(cr)
Issuer Rating	A1
Senior Unsecured	A1
Junior Senior Unsecured -Dom Curr	Baa1
Subordinate	Baa2 (hyb)
Source: Moody's Investors Service	

5 August 2021

© 2021 Moody's Corporation, Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their licensors and affiliates (collectively, "MOODY'S"). All rights reserved.

CREDIT RATINGS ISSUED BY MOODY'S CREDIT RATINGS AFFILIATES ARE THEIR CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES, AND MATERIALS, PRODUCTS, SERVICES AND INFORMATION PUBLISHED BY MOODY'S (COLLECTIVELY, "PUBLICATIONS") MAY INCLUDE SUCH CURRENT OPINIONS. MOODY'S DEFINES CREDIT RISK AS THE RISK THAT AN ENTITY MAY NOT MEET ITS CONTRACTUAL FINANCIAL OBLIGATIONS AS THEY COME DUE AND ANY ESTIMATED FINANCIAL LOSS IN THE EVENT OF DEFAULT OR IMPAIRMENT. SEE APPLICABLE MOODY'S RATING SYMBOLS AND DEFINITIONS PUBLICATION FOR INFORMATION ON THE TYPES OF CONTRACTUAL FINANCIAL OBLIGATIONS ADDRESSED BY MOODY'S CREDIT RATINGS. CREDIT RATINGS, DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. CREDIT RATINGS, NON-CREDIT ASSESSMENTS ("ASSESSMENTS"), AND OTHER OPINIONS INCLUDED IN MOODY'S PUBLICATIONS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. MOODY'S PUBLICATIONS MAY ALSO INCLUDE QUANTITATIVE MODEL-BASED ESTIMATES OF CREDIT RISK AND RELATED OPINIONS OR COMMENTARY PUBLISHED BY MOODY'S ANALYTICS, INC. AND/OR ITS AFFILIATES. MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND PUBLICATIONS DO NOT CONSTITUTE OR PROVIDE INVESTMENT OR FINANCIAL ADVICE, AND MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND PUBLICATIONS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. MOODY'S CREDIT RATINGS, ASSESSMENTS AND OTHER OPINIONS AND PUBLICATIONS WITH THE EXPECTATION AND UNDERSTANDING THAT EACH INVESTOR WILL, WITH DUE CARE, MAKE ITS OWN STUDY AND EVALUATION OF EACH SECURITY THAT IS UNDER CONSIDERATION FOR PURCHASE, HOLDING. OR SALE.

MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS, AND PUBLICATIONS ARE NOT INTENDED FOR USE BY RETAIL INVESTORS AND IT WOULD BE RECKLESS AND INAPPROPRIATE FOR RETAIL INVESTORS TO USE MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS OR PUBLICATIONS WHEN MAKING AN INVESTMENT DECISION. IF IN DOUBT YOU SHOULD CONTACT YOUR FINANCIAL OR OTHER PROFESSIONAL ADVISER.

ALL INFORMATION CONTAINED HEREIN IS PROTECTED BY LAW, INCLUDING BUT NOT LIMITED TO, COPYRIGHT LAW, AND NONE OF SUCH INFORMATION MAY BE COPIED OR OTHERWISE REPRODUCED, REPACKAGED, FURTHER TRANSMITTED, TRANSFERRED, DISSEMINATED, REDISTRIBUTED OR RESOLD, OR STORED FOR SUBSEQUENT USE FOR ANY SUCH PURPOSE, IN WHOLE OR IN PART, IN ANY FORM OR MANNER OR BY ANY MEANS WHATSOEVER, BY ANY PERSON WITHOUT MOODY'S PRIOR WRITTEN CONSENT.

MOODY'S CREDIT RATINGS, ASSESSMENTS, OTHER OPINIONS AND PUBLICATIONS ARE NOT INTENDED FOR USE BY ANY PERSON AS A BENCHMARK AS THAT TERM IS DEFINED FOR REGULATORY PURPOSES AND MUST NOT BE USED IN ANY WAY THAT COULD RESULT IN THEM BEING CONSIDERED A BENCHMARK.

All information contained herein is obtained by MOODY'S from sources believed by it to be accurate and reliable. Because of the possibility of human or mechanical error as well as other factors, however, all information contained herein is provided "AS IS" without warranty of any kind. MOODY'S adopts all necessary measures so that the information it uses in assigning a credit rating is of sufficient quality and from sources MOODY'S considers to be reliable including, when appropriate, independent third-party sources. However, MOODY'S is not an auditor and cannot in every instance independently verify or validate information received in the rating process or in preparing its Publications.

To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability to any person or entity for any indirect, special, consequential, or incidental losses or damages whatsoever arising from or in connection with the information contained herein or the use of or inability to use any such information, even if MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers is advised in advance of the possibility of such losses or damages, including but not limited to: (a) any loss of present or prospective profits or (b) any loss or damage arising where the relevant financial instrument is not the subject of a particular credit rating assigned by MOODY'S.

To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability for any direct or compensatory losses or damages caused to any person or entity, including but not limited to by any negligence (but excluding fraud, willful misconduct or any other type of liability that, for the avoidance of doubt, by law cannot be excluded) on the part of, or any contingency within or beyond the control of, MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers, arising from or in connection with the information contained herein or the use of or inability to use any such information.

NO WARRANTY, EXPRESS OR IMPLIED, AS TO THE ACCURACY, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE OF ANY CREDIT RATING, ASSESSMENT, OTHER OPINION OR INFORMATION IS GIVEN OR MADE BY MOODY'S IN ANY FORM OR MANNER WHATSOEVER.

Moody's Investors Service, Inc., a wholly-owned credit rating agency subsidiary of Moody's Corporation ("MCO"), hereby discloses that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by Moody's Investors Service, Inc. have, prior to assignment of any credit rating, agreed to pay to Moody's Investors Service, Inc. for credit ratings opinions and services rendered by it fees ranging from \$1,000 to approximately \$5,000,000. MCO and Moody's Investors Service also maintain policies and procedures to address the independence of Moody's Investors Service credit ratings and credit rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold credit ratings from Moody's Investors Service and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at <a href="https://www.moodys.com">www.moodys.com</a> under the heading "Investor Relations — Corporate Governance — Director and Shareholder Affiliation Policy."

Additional terms for Australia only: Any publication into Australia of this document is pursuant to the Australian Financial Services License of MOODY'S affiliate, Moody's Investors Service Pty Limited ABN 61 003 399 657AFSL 336969 and/or Moody's Analytics Australia Pty Ltd ABN 94 105 136 972 AFSL 383569 (as applicable). This document is intended to be provided only to "wholesale clients" within the meaning of section 761G of the Corporations Act 2001. By continuing to access this document from within Australia, you represent to MOODY'S that you are, or are accessing the document as a representative of, a "wholesale client" and that neither you nor the entity you represent will directly or indirectly disseminate this document or its contents to "retail clients" within the meaning of section 761G of the Corporations Act 2001. MOODY'S credit rating is an opinion as to the creditworthiness of a debt obligation of the issuer, not on the equity securities of the issuer or any form of security that is available to retail investors.

Additional terms for Japan only: Moody's Japan K.K. ("MJKK") is a wholly-owned credit rating agency subsidiary of Moody's Group Japan G.K., which is wholly-owned by Moody's Overseas Holdings Inc., a wholly-owned subsidiary of MCO. Moody's SF Japan K.K. ("MSFJ") is a wholly-owned credit rating agency subsidiary of MJKK. MSFJ is not a Nationally Recognized Statistical Rating Organization ("NRSRO"). Therefore, credit ratings assigned by MSFJ are Non-NRSRO Credit Ratings. Non-NRSRO Credit Ratings are assigned by an entity that is not a NRSRO and, consequently, the rated obligation will not qualify for certain types of treatment under U.S. laws. MJKK and MSFJ are credit rating agencies registered with the Japan Financial Services Agency and their registration numbers are FSA Commissioner (Ratings) No. 2 and 3 respectively.

MJKK or MSFJ (as applicable) hereby disclose that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by MJKK or MSFJ (as applicable) have, prior to assignment of any credit rating, agreed to pay to MJKK or MSFJ (as applicable) for credit ratings opinions and services rendered by it fees ranging from JPY125,000 to approximately JPY550,000,000.

MJKK and MSFJ also maintain policies and procedures to address Japanese regulatory requirements.

REPORT NUMBER 1294013

5 August 2021 SpareBank 1 SMN: Update to credit analysis

# **CLIENT SERVICES**

 Americas
 1-212-553-1653

 Asia Pacific
 852-3551-3077

 Japan
 81-3-5408-4100

 EMEA
 44-20-7772-5454

