

CREDIT OPINION

14 May 2018

Update

Rate this Research >>

RATINGS

SpareBank 1 SR-Bank ASA

Domicile	Norway
Long Term Debt	A1
Type	Senior Unsecured - Fgn Curr
Outlook	Negative
Long Term Deposit	A1
Type	LT Bank Deposits - Fgn Curr
Outlook	Negative

Please see the [ratings section](#) at the end of this report for more information. The ratings and outlook shown reflect information as of the publication date.

Contacts

Nondas Nicolaidis 357-2569-3006
VP-Sr Credit Officer
nondas.nicolaides@moodys.com

Louise Eklund 46-8-5025-6569
Associate Analyst
louise eklund@moodys.com

Jean-Francois Tremblay 44-20-7772-5653
Associate Managing Director
jean-francois.tremblay@moodys.com

Sean Marion 44-20-7772-1056
MD-Financial Institutions
sean.marion@moodys.com

CLIENT SERVICES

Americas 1-212-553-1653

Asia Pacific 852-3551-3077

SpareBank 1 SR-Bank ASA

Update to credit analysis

Summary

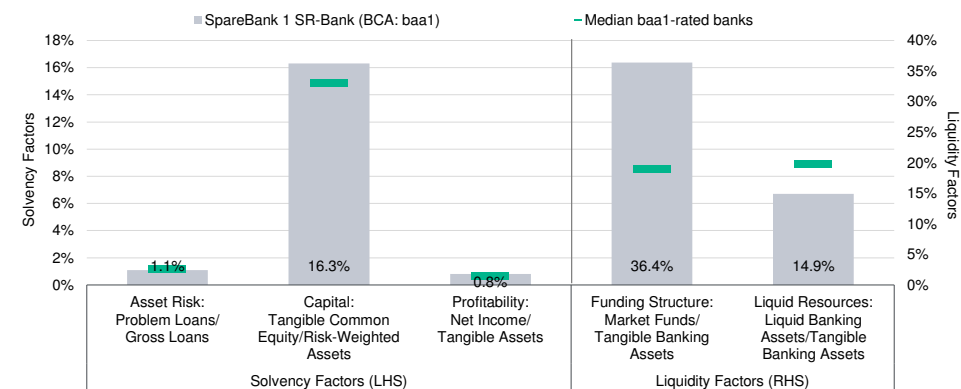
SpareBank 1 SR-Bank's long-term deposit and senior unsecured debt ratings of A1 take into account the bank's baseline credit assessment (BCA) of baa1, but also our loss given failure (LGF) analysis and government support assumptions that combine to three-notches of rating uplift from its BCA.

SpareBank 1 SR-Bank's BCA of baa1 primarily reflects the bank's solid regional position, strengthened capital buffers (common equity Tier 1 capital ratio of 15% in March 2018), increasing pre-provision income combined with lower credit impairments, and also its robust liquidity position. These strengths are balanced against the bank's limited geographic reach, which results in high credit-risk concentrations in more volatile sectors, such as oil/offshore and commercial real estate. Despite some deterioration in the bank's problem loans and related impairments in recent years, driven mainly by exposure to the oil sector, its robust risk management systems have helped the bank maintain sound asset quality with a problem loans to gross loans (including covered bond loans) ratio of around 1.1% in March 2018.

The bank's BCA also reflects the resilient performance of the bank despite challenging economic conditions in Norway over the last two years, as well as Moody's forward-looking expectation that the bank's asset quality, profitability and capitalization will remain robust in a gradually improving operating environment. Concurrently, the BCA considers the bank's relatively high dependence on market funding, and more specifically on covered bonds, a common feature among Norwegian banks.

Exhibit 1

Rating Scorecard - Key financial ratios



Source: Moody's Financial Metrics

Credit strengths

- » Sparebank 1 SR-Bank's BCA is supported by its Very Strong- Macro Profile
- » A strengthened capital buffer provides protection from current and future credit losses
- » Comfortable liquidity position
- » Large volume of deposits and junior debt result in deposit ratings benefiting from a very low loss-given-failure rate, with a two notch uplift from the BCA

Credit challenges

- » Exposures to oil-related volatile sectors pose risks to asset quality
- » Profitability will continue to be impacted by elevated credit costs, albeit pre-provision income has increased
- » Reliance on market funding renders the bank vulnerable to fluctuations in investor sentiment

Rating Outlook

SpareBank 1 SR-Bank's deposit and debt ratings carry a negative outlook to reflect the potential rating pressure from the upcoming implementation of BRRD in Norway, which will trigger a reassessment of our government support assumptions (please see [press release](#) for more details).

Factors that could lead to an upgrade

Upward rating momentum could develop if SpareBank 1 SR-Bank shows: (1) stabilisation of its asset quality trends, especially in the more volatile segments, such as oil/offshore and commercial real estate; (2) continued good access to capital markets and improved liquidity; and/or (3) strong earnings generation without an increase in its risk profile.

Factors that could lead to a downgrade

Future downward rating pressure would emerge if (1) Sparebank 1 SR-Bank's problem loans ratio increases significantly above our system-wide expectation of approximately 2%; (2) financing conditions become more difficult; (3) the bank's risk profile increases, for example as a result of increased exposures to more volatile sectors or if the quality of the oil-related portfolio deteriorates further; (4) the macroeconomic environment weakens more than currently anticipated, leading to a lower Macro Profile; (5) a reduction in the rating uplift as a result of our LGF analysis; and/or (6) the eventual passage of the official resolution law (BRRD) in Norway and revision of our government support assumptions.

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.moody's.com for the most updated credit rating action information and rating history.

Key indicators

Exhibit 2

SpareBank 1 SR-Bank ASA (Consolidated Financials) [1]

	12-17 ²	12-16 ²	12-15 ²	12-14 ²	12-13 ³	CAGR/Avg. ⁴
Total Assets (NOK billion)	231	218	221	208	157	10.2 ⁵
Total Assets (EUR million)	23,540	24,023	22,959	22,904	18,779	5.8 ⁵
Total Assets (USD million)	28,266	25,338	24,940	27,715	25,876	2.2 ⁵
Tangible Common Equity (NOK billion)	20	18	17	15	14	9.1 ⁵
Tangible Common Equity (EUR million)	1,996	1,999	1,736	1,689	1,657	4.8 ⁵
Tangible Common Equity (USD million)	2,396	2,108	1,886	2,044	2,284	1.2 ⁵
Problem Loans / Gross Loans (%)	1.1	1.2	0.8	0.5	1.1	0.9 ⁶
Tangible Common Equity / Risk Weighted Assets (%)	16.3	15.6	14.0	12.7	12.3	14.7 ⁷
Problem Loans / (Tangible Common Equity + Loan Loss Reserve) (%)	10.1	11.4	8.0	5.9	8.7	8.8 ⁶
Net Interest Margin (%)	1.5	1.5	1.5	1.7	1.5	1.5 ⁶
PPI / Average RWA (%)	2.3	2.1	1.6	1.9	1.9	2.0 ⁷
Net Income / Tangible Assets (%)	0.9	0.7	0.7	0.9	1.2	0.9 ⁶
Cost / Income Ratio (%)	44.1	45.0	51.3	48.4	48.3	47.4 ⁶
Market Funds / Tangible Banking Assets (%)	36.4	38.1	40.6	42.9	41.1	39.8 ⁶
Liquid Banking Assets / Tangible Banking Assets (%)	14.9	12.4	10.8	9.6	11.3	11.8 ⁶
Gross Loans / Due to Customers (%)	196.2	212.2	205.6	214.1	167.8	199.2 ⁶

[1] All figures and ratios are adjusted using Moody's standard adjustments [2] Basel III - fully-loaded or transitional phase-in; IFRS [3] Basel II; IFRS [4] May include rounding differences due to scale of reported amounts [5] Compound Annual Growth Rate (%) based on time period presented for the latest accounting regime [6] Simple average of periods presented for the latest accounting regime. [7] Simple average of Basel III periods presented

Source: Moody's Financial Metrics

Profile

SpareBank 1 SR-Bank is the leading financial group in Southern and Western Norway and the fifth-largest bank in Norway in terms of consolidated assets. The financial group provides a range of products and services, including traditional banking services such as loans, insurance and savings products, as well as securities trading, accounting services and estate agency services for retail as well as corporate customers. As of 31 March 2018, its consolidated assets (including loans transferred to covered bond companies) totalled NOK232 billion.

Detailed credit considerations

SpareBank 1 SR-Bank's BCA is supported by its Very Strong- Macro Profile

SpareBank 1 SR-Bank's operating environment is purely domestic and its Macro Profile is thus aligned with that of Norway, at [Very Strong-](#). Norwegian banks benefit from operating in an affluent and developed country with very high economic, institutional and government financial strength as well as low susceptibility to event risk. Norway has a diversified and growing economy, which has demonstrated resilience to the past weakening in the oil sector. We expect the bank to further benefit from the gradual pick-up of economic activity in its home region, triggered by the more recent increase in oil prices, combined with a reduction in unemployment

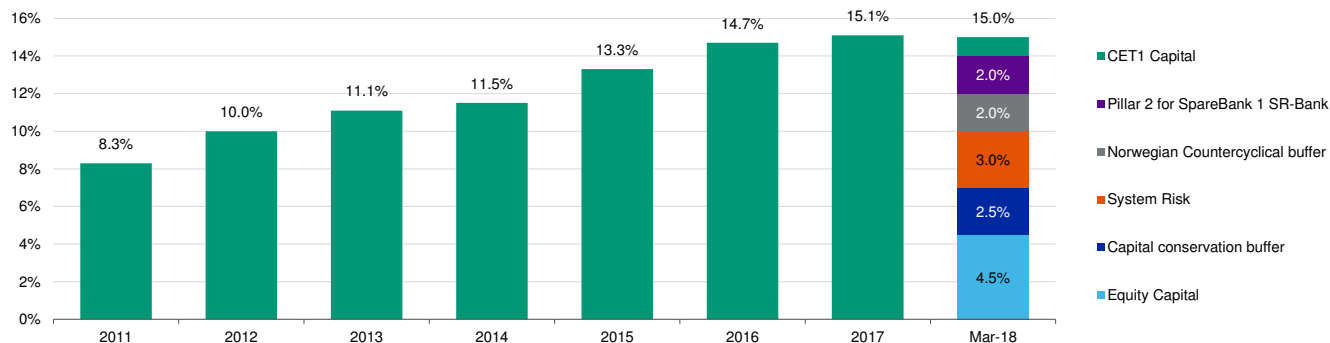
The main risks to the system stem from a high level of household indebtedness and domestic banks' reliance on market funding. However, these risks are offset by the strength of households' ability to service debt, banks' adequate capitalisation and the relatively small size of the banking system compared to GDP.

A strengthened capital buffer provides protection from current and future credit losses

SpareBank 1 SR-Bank improved its common equity Tier 1 (CET1) ratio to 15% in March 2018 (see Exhibit 3), compared to 14.7% in March 2017, well above the increased regulatory requirement, as the bank took initiatives to enhance its capital buffer against potential future losses. The FSA has assigned a Pillar 2 requirement of 2.0% to SpareBank 1 SR-Bank, which combined with the increased countercyclical buffer of 2.0% results in a regulatory CET 1 requirement of 14.0% effective as of 31 December 2017. The bank's CET1 target is accordingly revised to 15% from 14.5%, including a 1% management buffer above the new regulatory requirement.

SpareBank 1 SR-Bank has managed to accumulate capital through increased profitability, conservative growth and modest dividend payout. Consequently, the bank is well positioned to continue developing its leading position in Southern and Western Norway.

Exhibit 3
SpareBank 1 SR-Bank CET1 development



Source: Company reports and presentations

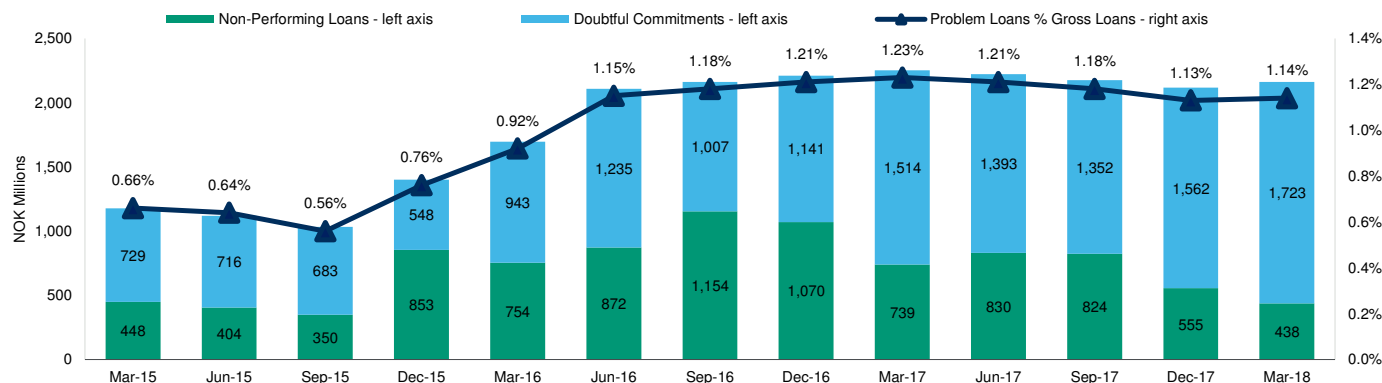
The bank's Tangible Common Equity (TCE) has been supported by good earnings generation and retained earnings. We also note that the bank's Tier 1 capital ratio was 16% and the total capital adequacy ratio was 18.1% at end-March 2018. Such capital metrics compare favourably with other Nordic banks, as the transitional rules in Norway envisage that the minimum requirement for capital adequacy cannot amount to less than 80% of the corresponding amount calculated according to the Basel I rules.

Moreover, the bank's leverage ratio was satisfactory at 7.4% at end-March 2018 from 7.1% the year before, significantly higher than both international and Norwegian requirements. This is despite the bank increasing its dividend payment to NOK4.25 per share (52% payout ratio) in 2017 from NOK2.25 in 2016. Looking ahead, we expect SpareBank 1 SR-Bank to target an annual payout ratio of 50% going forward, unless financial needs or capital requirements dictate otherwise in order to maintain a CET1 ratio of at least 15%. We note that the implementation of IFRS 9 from January 2018 onwards has a very minimal impact on the bank's capital metrics by up to 13 basis points.

Exposures to volatile sectors pose risks to asset quality

Following some asset-quality deterioration in recent years for SpareBank 1 SR-Bank, due to Norway's off-shore industry that faced challenges from reduced investments and lower oil prices in 2015-2016, the bank's problem loans have stabilised in 2017-18 improving somewhat its position. The bank's stock of nonperforming loans and doubtful commitments decreased marginally to NOK2,161 million (or 1.14% of gross loans including covered bond loans) at end-March 2018, compared with NOK2,253 million (or 1.23% of gross loans) at end-March 2017 (see Exhibit 4). We note that the bank's loan losses in 2017-18 mainly relate to commitments within the oil industry. The Norwegian Petroleum Directorate expects a marginal increase of 1.5% in oil investments in 2018 followed by an increase of around 15% in 2019, which will likely improve economic activity in the region and further reduce the bank's asset risk.

Exhibit 4
SpareBank 1 SR-Bank's problem loans



Source: Company reports and presentations

SpareBank 1 SR-Bank is one of the highest exposed Norwegian banks to these sectors, with oil-related exposures (including oil services, oil and gas, and offshore) at end-March 2018 comprising around 6.1% of its total gross loan book (6.5% of total exposure at default relates to oil operations, including loans in covered bond companies). Loans to the offshore industry (OSVs, rigs and seismic vessels) account for around 4.2% of total gross loans, while oil service companies comprise 2.1%, and oil and gas companies account for 0.8%. The bank calculates its approximately NOK1.7 billion exposure to 18 rigs as having an average weighted probability of default in its overall portfolio at 3.4% and NOK5.7 billion to 82 OSVs with the highest average weighted probability of default at 3.1%, constituting the most risky assets on its balance sheet. However, the recent pick-up in oil prices is likely to contain the potential future problems in the industry.

In addition, the bank is also exposed to the commercial real estate sector (14.6% of gross loans at end-March 2018), a significant part of which is located in the county of Rogaland, where reduced oil investments have led to vacancy rate increases in the past, although the situation has improved more recently. This exposure combined with its sizeable mortgage loan book, could leave the bank vulnerable to any unexpected material decrease in property prices, a feature shared with other Norwegian savings banks. However, we note that SpareBank 1 SR-Bank's loan-to-value for new mortgages is only around 69%, while around 92% of its mortgages relate to owner-occupied properties, which mitigate some of the downside risks.

Our assigned Asset Risk Score reflects the challenges the bank has faced related to the distress in the oil-sector that unfolded in 2015-2016, taking into account the bank's relatively limited geographical diversification, concentration to vulnerable sectors, but also a stock of restructured loans that have not been impaired and could potentially expose the bank to additional provisions. Nonetheless, we view positively the bank's recent opening of a branch in Oslo, aiming predominantly corporate clients, as part of its national expansion strategy that will gradually improve its regional diversification.

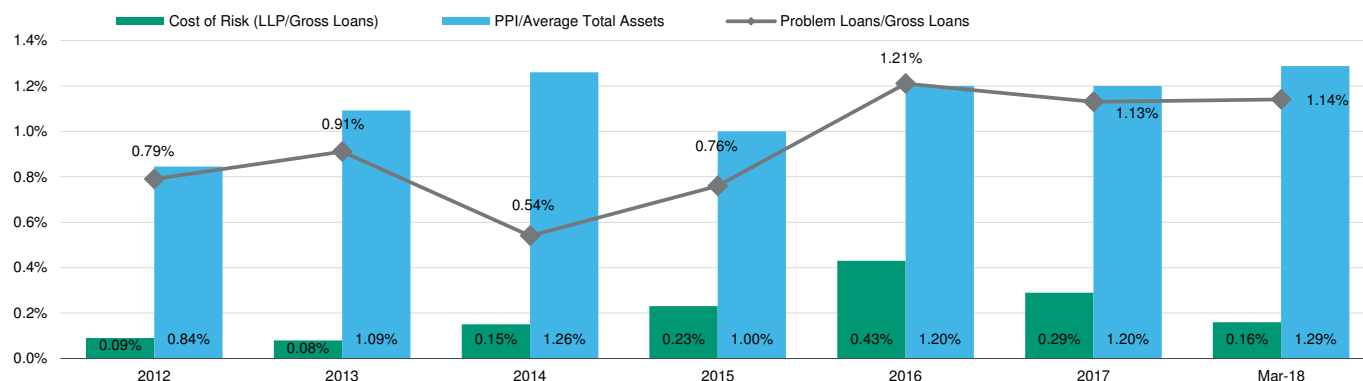
Profitability will continue to be impacted by elevated credit costs, albeit pre-provision income has increased

Despite the elevated risks that SpareBank 1 SR-Bank faces through its oil-related exposures, it increased its pre-provision income by around 7% year-on-year for 2017 as a result of higher retail lending margins and cost containment. Net interest income boosted the bank's pre provision income in the first quarter of 2018, as it increased by 9% compared to the same period in 2017. Net income for 2017 increased by around 19% year-on-year and the bank reported lower loan losses at NOK543 million compared to NOK778 million in 2016. Loan losses decreased significantly in the first quarter of 2018 to NOK74 million compared to NOK168 million in the first quarter of 2017. Individual write-downs on commitments related to the oil industry largely constitute the impairment losses for 2017 as well as for the first quarter of 2018.

The bank's credit costs decreased to 0.29% of gross loans (including covered bond loans) in 2017, from 0.42% in 2016, consuming around 17% of pre-provision income in 2017 compared to 26% in 2016. Credit costs in the first quarter of 2018 decreased further to 0.16% from 0.37% in the same period of 2017. For 2018, the bank expects loan losses to fall within the range of NOK400-500 million, despite the adoption of IFRS 9 with new more conservative principles for write-downs from January 2018 onwards. The methodology in the IFRS 9 standard entails somewhat larger volatility in write-downs, as they will be made at an earlier stage than under current practice.

Exhibit 5

SpareBank 1 SR-Bank's Cost of Risk and PPI evolution



Note: PPI/Average Total Assets for Q1 2018 is an estimate based on annualised and unadjusted figures; Source: Company reports and presentations, Moody's Financial Metrics

Net interest income continues to be SpareBank 1 SR-Bank's main source of earnings, corresponding to almost 59% of the bank's total income in 2017 from 58% of the total income in 2017. When including net interest income (classified as commission) from the SpareBank 1 alliance covered bond companies, net interest income comprised around 62% of total income for 2017. Net interest income constituted 62% of total income in the first quarter of 2018, or 65% when including the net interest income classified as commission. We expect net interest margins (NIM) to be somewhat pressured in 2018, on the back of a loan growth of around 4-6% that the bank expects, although NIM should benefit over the longer-term in an increasing interest rate cycle in Norway.

The net commission income provides diversification in the bank's total revenues, with net commission income (excluding net interest income classified as commission income) constituting around 26% of the total income for 2017 and also in the first quarter of 2018. Overall, SR-Bank's cost efficiency remained favourable with one of the lowest cost-to-income ratios (40.7% in 2017 and 42.1% in the first quarter of 2018) among other large Norwegian Savings Banks. We note that the bank targets less than 3% operating expenses growth during 2018, although we understand that IT-related expenses will increase at a higher rate.

Looking ahead, we expect the bank's pre-provision earnings to remain resilient in the next 12-18 months. Nonetheless, our Profitability Score adjustment for SpareBank 1 SR-Bank reflects our expectation that the bank's oil-related exposure and restructured loans will continue to pose downside risks to the bank's bottom line, constraining its profitability potential.

Reliance on market funding renders it vulnerable to fluctuations in investor sentiment

While SpareBank 1 SR-Bank benefits from solid access to domestic and international capital markets, with a stronger footing than its local peers, providing a good funding diversification, its reliance on wholesale funding remains high. Market funds accounted for 36.4% of tangible banking assets (including assets transferred to covered bond companies) at end-December 2017 (ratio we use in our scorecard), which we believe renders the bank susceptible to potential shifts in investor sentiment.

SpareBank 1 SR-Bank also benefits from a good deposit base, which represented around 47% of total liabilities (including covered bonds issued through SpareBank 1 Boligkreditt and SpareBank 1 Næringskreditt) at end-March 2018, which has proven to be resilient and stable over many years. Deposits from customers increased by around 7% as of end-March 2018 compared to end-March 2017, mainly driven by growth in wholesale deposits from municipalities and other public sector entities. Nonetheless, the bank's gross loans-to-deposits ratio, including transferred loans, was around 190% at end-March 2018.

According to our methodology, we globally reflect the relative stability of covered bonds compared to unsecured market funding through a standard adjustment in our scorecard. Covered bonds have become an increasingly important source of funding for the bank, which issues covered bonds through the wholly owned covered bond company SR-Boligkreditt AS and specialised companies owned jointly with other members of the SpareBank 1 Alliance. Funding through the jointly owned covered bond companies SpareBank 1 Boligkreditt (residential mortgages) and SpareBank 1 Næringskreditt (commercial mortgages) is carried out off-balance-sheet, since the bank does not consolidate these entities.

At end-March 2018, the bank had transferred around NOK14.2 billion to Sparebank 1 Boligkreditt and NOK0.5 billion to SpareBank 1 Næringskreditt, i.e. 8% of its total loan book (including transferred loans). In addition, in the second quarter of 2015 the bank set up SR-Boligkreditt as a wholly owned covered bond company, to diversify and optimise its funding by gradually shifting its cover bond activity to this entity. While we view positively the diversification benefit of covered bond funding, extensive use of covered bond funding increases the amount of pledged assets unavailable for unsecured bondholders, including depositors in liquidation.

Our Funding Structure Score reflects our view that although SpareBank 1 SR-Bank has benefitted from strong access to domestic and international capital markets, its high reliance on market funding - a common feature of Nordic banks - is a material source of risk. We believe that in times of market stress, market funding can become more expensive and/or restricted.

A mitigating factor to the bank's reliance on market funds is its improved liquidity buffer. The liquidity buffer of NOK34.4 billion or around 14.9% of tangible assets (including assets transferred to covered bond companies) at end-December 2017 consists mainly of cash, short-term repos, and covered bonds. However, we note that this ratio understates the core liquidity of the bank, given that it does not take into account the liquid assets held by SpareBank 1 Boligkreditt and SpareBank 1 Næringskreditt. Accordingly, we incorporate a positive adjustment in the assigned Liquid Resources Score to reflect the additional source of liquidity stemming from the covered bond companies.

In addition to the liquidity buffer, the bank has NOK19.6 billion in home mortgages ready to be transferred to a covered bond company, while it reported a commendable liquidity coverage ratio (LCR) of 177% at end-March 2018, somewhat below the 200% at end-March 2017. The corresponding net stable funding ratio (NSFR) of the bank was 118% in March 2017.

Support and structural considerations

Loss Given Failure and additional notching

Norway will shortly implement the EU's Bank Recovery and Resolution Directive, which confirms our current assumptions regarding LGF analysis. For our resolution 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 SR-Bank's long-term deposit rating and senior unsecured debt rating, our LGF analysis considers the combination of the bank's junior deposits, its outstanding debt volume and the amount of debt subordinated to this. This has resulted in a Preliminary Rating Assessment (PRA) of two notches above the BCA, reflecting very low loss-given-failure. For junior securities issued by SpareBank 1 SR-Bank, our LGF analysis confirms a high level loss-given-failure, given the small volume of debt and limited protection from more subordinated instruments and residual equity.

Government support

SpareBank 1 SR-Bank has a sound franchise in the county of Rogaland, south-west Norway, with 36 branches. We estimate that the bank has regional market shares of around 35% for lending and 40% for deposits (based on total lending in the county according to Statistics Norway). The bank has also expanded into the neighbouring counties, but has a national market share at around 4-5%. Therefore, we expect a moderate probability of government support for debt and deposits, resulting in one additional notch of rating uplift. However, the expected implementation of an official resolution regime in Norway in the coming months, might cause us to reconsider/lower our government support assumptions for all rated savings banks in Norway, including SpareBank 1 SR-Bank, which also drives our negative outlook.

For the bank's junior securities, we continue to consider that potential government support is low and 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.

We intend to reassess our government support assumptions for all Norwegian savings banks, including SpareBank 1 SR-Bank, following the enactment of a relevant local legislation for the implementation of an official resolution regime. The new legislation is aligned with the EU's bank recovery and resolution directive (BRRD) and will come into force from January 2019.

Counterparty Risk Assessment

SpareBank 1 SR's CR Assessment is positioned at Aa3(cr)/Prime-1(cr)

CR Assessments are opinions of how counterparty obligations are likely to be treated if a bank fails and are distinct from debt and deposit ratings in that they (1) consider only the risk of default rather than the likelihood of default and the expected financial loss suffered in the event of default; and (2) apply to counterparty obligations and contractual commitments rather than debt or deposit instruments. The CR Assessment is an opinion of the counterparty risk related to a bank's covered bonds, contractual performance obligations (servicing), derivatives (e.g., swaps), letters of credit, guarantees and liquidity facilities.

Foreign currency deposit rating

SpareBank 1 SR-Bank's foreign-currency deposit rating of A1 is unconstrained, given that Norway has a country ceiling of Aaa.

Foreign currency debt rating

SpareBank 1 SR-Bank's foreign-currency debt rating of A1 is unconstrained given that Norway has a country ceiling of Aaa.

About Moody's bank Scorecard

Our Scorecard is designed to capture, express and explain in summary form our rating committee's judgment. When read in conjunction with our research, a fulsome presentation of our judgment is expressed. As a result, the output of our Scorecard may materially differ from that suggested by raw data alone (though it has been calibrated to avoid the frequent need for strong divergence). The Scorecard output and the individual scores are discussed in rating committees and may be adjusted up or down to reflect conditions specific to each rated entity.

Rating methodology and scorecard factors

Exhibit 6

SpareBank 1 SR-Bank ASA

Macro Factors

Weighted Macro Profile **Very Strong -** **100%**

Factor	Historic Ratio	Macro Adjusted Score	Credit Trend	Assigned Score	Key driver #1	Key driver #2
Solvency						
Asset Risk						
Problem Loans / Gross Loans	1.1%	aa2	← →	baa1	Geographical concentration	Sector concentration
Capital						
TCE / RWA	16.3%	aa2	← →	aa2		
Profitability						
Net Income / Tangible Assets	0.8%	baa1	← →	baa2	Earnings quality	Expected trend
Combined Solvency Score		aa3		a2		
Liquidity						
Funding Structure						
Market Funds / Tangible Banking Assets	36.4%	ba2	← →	ba2	Market funding quality	
Liquid Resources						
Liquid Banking Assets / Tangible Banking Assets	14.9%	baa3	← →	baa2	Quality of liquid assets	Stock of liquid assets
Combined Liquidity Score		ba1		ba1		
Financial Profile				baa1		
Business Diversification				0		
Opacity and Complexity				0		
Corporate Behavior				0		
Total Qualitative Adjustments				0		
Sovereign or Affiliate constraint:				Aaa		
Scorecard Calculated BCA range				a3-baa2		
Assigned BCA				baa1		
Affiliate Support notching				0		
Adjusted BCA				baa1		

Balance Sheet	in-scope (NOK million)	% in-scope	at-failure (NOK million)	% at-failure
Other liabilities	79,374	34.3%	89,103	38.6%
Deposits	95,384	41.3%	85,655	37.1%
Preferred deposits	70,584	30.5%	67,055	29.0%
Junior Deposits	24,800	10.7%	18,600	8.0%
Senior unsecured bank debt	46,548	20.1%	46,548	20.1%
Dated subordinated bank debt	1,916	0.8%	1,916	0.8%
Junior subordinated bank debt	950	0.4%	950	0.4%
Equity	6,933	3.0%	6,933	3.0%
Total Tangible Banking Assets	231,105	100%	231,105	100%

Debt class	De Jure waterfall		De Facto waterfall		Notching		LGF Notching Guidance vs. Adjusted BCA	Assigned LGF notching	Additional notching	Preliminary Rating Assessment
	Instrument volume + subordination	Sub-ordination	Instrument volume + subordination	Sub-ordination	De Jure	De Facto				
Counterparty Risk Assessment	32.4%	32.4%	32.4%	32.4%	3	3	3	3	0	a1 (cr)
Deposits	32.4%	4.2%	32.4%	24.4%	2	3	2	2	0	a2
Senior unsecured bank debt	32.4%	4.2%	24.4%	4.2%	2	2	2	2	0	a2
Dated subordinated bank debt	4.2%	3.4%	4.2%	3.4%	-1	-1	-1	-1	0	baa2 (hyb)
Junior subordinated bank debt	3.4%	3.0%	3.4%	3.0%	-1	-1	-1	-1	-1	baa3

Instrument class	Loss Given Failure notching	Additional Notching	Preliminary Rating Assessment	Government Support notching	Local Currency Rating	Foreign Currency Rating
Counterparty Risk Assessment	3	0	a1 (cr)	1	Aa3 (cr)	--
Deposits	2	0	a2	1	A1	A1
Senior unsecured bank debt	2	0	a2	1	--	A1
Dated subordinated bank debt	-1	0	baa2 (hyb)	0	--	Baa2 (hyb)
Junior subordinated bank debt	-1	-1	baa3	0	--	(P)Baa3

Source: Moody's Financial Metrics

Ratings

Exhibit 7

Category	Moody's Rating
SPAREBANK 1 SR-BANK ASA	
Outlook	Negative
Bank Deposits	A1/P-1
Baseline Credit Assessment	baa1
Adjusted Baseline Credit Assessment	baa1
Counterparty Risk Assessment	Aa3(cr)/P-1(cr)
Issuer Rating	A1
Senior Unsecured	A1
Subordinate	Baa2
Jr Subordinate MTN	(P)Baa3

Source: Moody's Investors Service

© 2018 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 INVESTORS SERVICE, INC. AND ITS RATINGS AFFILIATES ("MIS") ARE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES, AND MOODY'S PUBLICATIONS MAY INCLUDE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES. 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. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. CREDIT RATINGS AND MOODY'S 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. CREDIT RATINGS AND MOODY'S PUBLICATIONS DO NOT CONSTITUTE OR PROVIDE INVESTMENT OR FINANCIAL ADVICE, AND CREDIT RATINGS AND MOODY'S PUBLICATIONS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. NEITHER CREDIT RATINGS NOR MOODY'S PUBLICATIONS COMMENT ON THE SUITABILITY OF AN INVESTMENT FOR ANY PARTICULAR INVESTOR. MOODY'S ISSUES ITS CREDIT RATINGS AND PUBLISHES MOODY'S 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 AND MOODY'S 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 OR MOODY'S 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.

CREDIT RATINGS AND MOODY'S 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 the Moody's 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 SUCH RATING OR 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 rating, agreed to pay to Moody's Investors Service, Inc. for appraisal and rating services rendered by it fees ranging from \$1,500 to approximately \$2,500,000. MCO and MIS also maintain policies and procedures to address the independence of MIS's ratings and rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold ratings from MIS and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at www.moody's.com 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 61 003 399 657 AFSL 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. It would be reckless and inappropriate for retail investors to use MOODY'S credit ratings or publications when making an investment decision. If in doubt you should contact your financial or other professional adviser.

Additional terms for Japan only: Moody's Japan K.K. ("MJJK") 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 MJJK. 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. MJJK 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.

MJJK 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 MJJK or MSFJ (as applicable) have, prior to assignment of any rating, agreed to pay to MJJK or MSFJ (as applicable) for appraisal and rating services rendered by it fees ranging from JPY200,000 to approximately JPY350,000,000.

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

CLIENT SERVICES

Americas	1-212-553-1653
Asia Pacific	852-3551-3077
Japan	81-3-5408-4100
EMEA	44-20-7772-5454