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### Board declaration on risk management and a brief risk description

The Board of Directors of Länsförsäkringar Bank AB (publ), which is also the responsible institution of the Consolidated Situation, certifies that the risk management arrangement of the Consolidated Situation is satisfactory and that the implemented risk-management system is appropriate in relation to the adopted risk strategy adopted. The Board also upholds the risk description that outlines the risk exposure and risk appetite below.

#### Consolidated Situation's risks

Risks are a natural element of a bank's business activities and are defined in the Consolidated Situation as the possibility of negative deviations from an expected financial outcome. The main types of risk to which the Consolidated Situation is exposed are presented below.

Type of risk	Definition	Risk exposure and risk appetite
Credit risk	Credit risk pertains to the risk of losses arising due to counterparties being unable to fulfil their undertakings and of any collateral provided not covering the receivable, leading to a loss. Credit risk encompasses lending risk, issuer risk, counterparty risk, settlement risk and creditworthiness risk.	Lending primarily comprises mortgages for private individuals. The approach to risk is conservative and the credit quality of the loan portfolio is high. The Consolidated Situation's appetite for credit risk is moderate and risk-taking in relation to total assets is to be low. Business is conducted in line with adopted business plans, with high profitability and results in a well-diversified credit portfolio with high credit quality. Credit risk in the Consolidated Situation represents 88% of the total risk exposure amount.
Marketrisk	Market risk pertains to the risk of loss arising that is directly or indirectly caused by changes in the level or volatility in the market price of assets, liabilities and financial instruments, including losses caused by shortcomings in the matching between assets and liabilities. Market risk includes interestrate risk, currency risk, credit-spread risk, equities risk, property risk, option risk and pension risk.	The primary market risks are interest-rate risk and currency risk. The Consolidated Situation does not have a trading book. The risk appetite for market risk is low and based on earnings and capital measures.
Liquidity risk	Liquidity risk is defined as the risk that payment commitments cannot be fulfilled due to insufficient cash funds. Liquidity risk includes structural liquidity risk, financing risk, rollover risk and intraday liquidity risk.	The main financing sources are deposits in Länsförsäkringar Bank and funding based on Länsförsäkringar Hypotek's covered bonds with the highest possible credit rating. The risk appetite for liquidity risk is low and based on well-diversified funding and a satisfactory liquidity reserve.
Operational risk	Operational risk refers to the risk of losses arising due to inadequate or failed internal processes, human error, erroneous systems or external events, including legal risks. Operational risk includes product and process risk, personnel risk, security risk, legal risks, compliance risks, IT risks and model risk.	Operational risk is related to the operating activities of the business. The risk appetite for operational risk is low and based on actively preventing risk, capital measures and low incident levels. Operational risk in the Consolidated Situation represents 12% of the total risk exposure amount.
Business risk	Business risk pertains to the risk of lower earnings, higher expenses or loss of confidence from customers or other stakeholders. Business risk encompasses strategic risk, reputation risk and conduct risk.	Business risks are found in all products and portfolios in the Consolidated Situation. A large part of the banking operations comprises mortgages, which have a low level of volatility and thus a low business risk. Business risk is managed in the internal capital and liquidity adequacy assessment process (ICAAP and ILAAP).

### 1 | Introduction

This document "Risk and capital management Länsförsäkringar Bank AB" has been prepared in accordance with the requirements set out in the Regulation CRR (EU) 575/2013 and the Capital Requirements Directive CRD 2013/36/EU. The purpose of the document is for the institution to provide detailed and clear information on the risks to which the institution is exposed, the structure of its risk management and the compliance of the institution's capital position with the regulatory capital requirements. The Bank Group comprises the Parent Company Länsförsäkringar Bank AB and its subsidiaries, Länsförsäkringar Hypotek AB, Wasa Kredit AB and Länsförsäkringar Fondförvaltning AB (referred to below as the "Bank Group").

With the introduction of CRR and CRD IV, the parent mixed financial holding company, Gamla Länsförsäkringar AB¹, is also subject to prudential and reporting requirements. As a result, Gamla Länsförsäkringar AB is consolidated with the Bank Group. The consolidated situation comprises Gamla Länsförsäkringar AB, Länsförsäkringar Bank AB, Länsförsäkringar Hypotek AB, Wasa Kredit AB and Länsförsäkringar Fondförvaltning AB (referred to below as the "Consolidated Situation"). The Financial Supervisory Authority has decided that, from the third quarter, Länsförsäkringar Bank and its subsidiaries are also to be consolidated at the sub-group level (subconsolidated basis). The sub-group comprises Länsförsäkringar Bank and its subsidiaries, that is to say the Bank Group. The comparative period is per 31 December 2019.

### 1.1 LÄNSFÖRSÄKRINGAR BANK AB IN BRIEF 1.1.1 Strategy and goals

The strategy is to offer banking services to the Länsförsäkringar Alliance's customers and leverage Länsförsäkringar's strong brand and local presence. The banking operations have a large potential customer base with the Länsförsäkringar Alliance's 3.9 million customers.

A target group is the 3.2 million retail customers, of whom 2.4 million are home-insurance customers. Another target group is agricultural customers and small businesses. The aim is, based on low risk, to maintain healthy growth in volumes and profitability, have the most satisfied customers and more customers who have both banking and insurance with Länsförsäkringar. According to the 2020 Swedish Quality Index customer satisfaction survey, Länsförsäkringar Bank remains the player on the banking market with the most satisfied retail customers, a position that Länsförsäkringar Bank has won 15 times in the past 17 years. Länsförsäkringar Bank is also the player with the most satisfied corporate customers and one of the leading players in terms of customer satisfaction for retail mortgage customers, according to the 2020 Swedish Quality Index. The high customer satisfaction is confirmation of Länsförsäkringar's clear customer focus and high quality. With Länsförsäkringar's comprehensive banking and insurance offering, customers receive a total solution that creates security and added value.

#### Länsförsäkringar Bank and COVID-19

The year was dominated by the COVID-19 pandemic and the deep economic decline around the world. Sweden was also severely affected but fared better than most other European countries. The recovery in the second half of the year was good and the performance of the labour market was better than expected. The housing market showed resilience and housing prices rose sharply during the year. Given the uncertainty in the world, it is very important to ensure a high level of availability for customers and continue to offer the security and excellent service that are the hallmarks of Länsförsäkringar's entire offering. Our strong position combined with our local presence create solid conditions for supporting our bank customers. Länsförsäkringar has taken important initiatives across the country to support customers, local companies, clubs and associations and the health care sector, all of which have been severely affected by the COVID-19 pandemic.

#### **Customer ownership**

The Länsförsäkringar Alliance consists of 23 local, customer-owned regional insurance companies and the jointly owned Gamla Länsförsäkringar AB, which is the bank's Parent Company. The insurance customers own the regional insurance companies, which means that the principles of customer ownership also apply to the banking operations. Long-term respect for customers' security is fundamental to Länsförsäkringar, since customers are both the principal and owner.

#### Customer meetings and local market knowledge

The regional insurance companies are responsible for the local business operations and customer relationships. Business decisions are made locally and the regional insurance companies' commitment and network provide broad in-depth customer and market knowledge. Banking services are offered at the 128 branches of the regional insurance companies throughout Sweden. Trust, security and long-term relationships are created through personal customer meetings, all of which are high priority at Länsförsäkringar.

#### Forefront of digital services

Digital services are an important supplement to local customer meetings. The digital services in the mobile app and Internet bank make it convenient and easy for customers to do all their banking. Länsförsäkringar Bank's ambition is to always be at the forefront of digital developments to meet rising customer need and expectations for a digital and modern range of services, at the same time as we leverage developing trends in the market in the digital area.

#### Customer-driven and effective business model

Länsförsäkringar Bank supports the regional insurance companies in their customer meetings and sales. Product development takes

 $<sup>{}^1{\</sup>rm Effective}\,30\,{\rm December}\,2020, {\rm L\"{a}nsf\"{o}rs\"{a}kringar}\,{\rm AB's}\,{\rm legal}\,{\rm name}\,{\rm is}\,{}^*{\rm Gamla}\,{\rm L\"{a}nsf\"{o}rs\"{a}kringar}\,{\rm AB''}$ 

place in close cooperation between the regional insurance companies and Länsförsäkringar Bank. This cooperation features continuous efficiency enhancements to implement improvements that lead to improved service to customers, more efficient processes and lower expenses.

#### A strong brand

Länsförsäkringar Bank's successful growth and position in the market is based on customer ownership as well as Länsförsäkringar's strong brand and local presence.

#### Risk in the operations

The operations are characterised by a low risk profile. The Bank Group is exposed to a number of risks, primarily comprising credit risk, liquidity risk, operational risk and market risk. The macroeconomic situation in Sweden is critical for credit risk, since all loans are granted in Sweden. Credit losses remained low. The Bank Group has highly diversified funding and a liquidity reserve comprising securities with high liquidity and creditworthiness. Lending improved to SEK 340 billion (307) and the loan portfolio continued to maintain high credit quality.

#### Rating

Länsförsäkringar Bank's long-term credit rating is A1/Stable from Moody's and A/Stable from Standard & Poor's. The short-term credit ratings are A-1 from Standard & Poor's and P-1 from Moody's. Länsförsäkringar Hypotek's covered bonds maintained the highest credit rating of Aaa from Moody's, and AAA/Stable from Standard & Poor's. Länsförsäkringar Hypotek is thus one of three issuers in the Swedish market for covered bonds with the highest rating from both Standard & Poor's and Moody's.

#### Regulatory development

The development of new financial regulations is expected to continue at a rapid pace and will have a major impact on banks moving forward.

#### Capital adequacy rules

In December 2020, the Swedish parliament decided to change the capital adequacy rules due to the implementation of the EU banking package. The changed rules include the application of the new Pillar II requirements. The aim of the EU banking package is to increase the harmonisation of the provisions of the Capital Adequacy and Crisis Management Directives. Changes to the laws on bank recovery and resolution are expected to come into force mid-year 2021. The previously approved amendments to the Capital Requirements Regulation will start to apply from 28 June 2021 and will include a minimum leverage ratio and net stable funding ratio (NSFR). In December 2020, the Swedish Financial Supervisory Authority decided to extend the risk weight floor of 25% for Swedish mortgages by one year. The decision applies from 30 December 2020 until 30 December 2021. The European Banking Authority (EBA) has prepared new guidelines on banks' internal ratings-based approaches. Swedish banks need to adapt to these new regulatory changes, which will result in significant changes to models. The new guidelines are to have been implemented by 2021 at the latest.

A proposal on how completing the Basel III regulations is to be implemented is expected in 2021. The original proposal published by the Basel Committee in 2017 entails major changes for banks and includes changes to the Standardised Approach for both credit and operational risk as well as the introduction of a capital floor of 72.5%. The capital floor entails that the Risk Exposure Amount for a bank that applied internal models may not, in total, be lower than 72.5% of the risk-weighted amount calculated according to the Standardised Approach. The new rules are expected to take effect in 2023.

#### New EU rules on covered bonds

In November 2019, the EU decided on new regulations regarding covered bonds. The aim of the regulations is to create standardised rules for covered bonds within the EU. An inquiry into incorporating the regulations into Swedish law was published in November 2020. The new regulations include introducing a special requirement on a cover pool liquidity buffer. A higher match funding requirement is also proposed, meaning the degree to which the value of the cover pool is to exceed the nominal value of the covered bonds and certain changes to permitted LTV ratios. The new rules are expected to take effect in 2022.

#### **MREL**

In December 2020, the Swedish National Debt Office established its annual decisions on resolution plans and minimum requirement for own funds and eligible liabilities (MREL) for the institutions that the Debt Office deems to be systemically important, which includes Länsförsäkringar Bank. The Debt Office also decided on individual minimum requirements for Länsförsäkringar Bank's subsidiaries, Länsförsäkringar Hypotek and Wasa Kredit. Länsförsäkringar Bank is following regulatory developments and is highly prepared and well capitalised for impending changes, even if it is unclear at this stage what the effects of a capital requirement will be.

#### **Anti-money laundering**

Under the Swedish Money Laundering Act, financial companies are to assess, limit and monitor their risks of being utilised to launder money and finance terrorism. They are also to actively identify and report suspicious activities. The rules are comprised of three central pillars: risk assessment, customer due diligence, and monitoring and reporting. The fifth EU Money Laundering Directive came into effect in January 2020 through implementation in Swedish law and in the regulations of the Swedish Financial Supervisory Authority. The amendments include greater protection for whistle-blowers and improving the basis for cooperation and exchanging information between various supervisory authorities. Furthermore, the new law also includes managing and trading in virtual currencies. A sixth anti-money laundering directive is planned to be incorporated into Swedish law. Its main focus is to create standardised criminal law definitions of money laundering crimes, for example, and to harmonise the Member States' criminal laws on money laundering.

# 2 | Organisation

This section describes the Consolidated Situation based on the consolidation requirements of the Capital Requirements Regulation (CRR) and the Capital Requirements Directive (CRD IV) and how these differ from the consolidation requirements under accounting regulations.

#### 2.1 THE BANK GROUP

The accounting regulations define the Bank Group based on its legal ownership structure and on Länsförsäkringar Bank AB. The Bank Group comprises Länsförsäkringar Bank AB, and the wholly owned subsidiaries Länsförsäkringar Hypotek AB, Wasa Kredit AB and Länsförsäkringar Fondförvaltning AB.

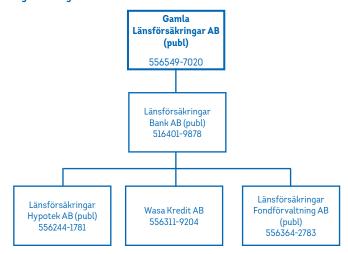
#### 2.2 CONSOLIDATED SITUATION

The Consolidated Situation encompasses: Gamla Länsförsäkringar AB, Länsförsäkringar Bank AB, Länsförsäkringar Hypotek AB, Wasa Kredit AB and Länsförsäkringar Fondförvaltning AB. This structure is defined in CRR and CRD IV as the Consolidated Situation and its composition does not correspond to the accounting structure. Consolidation also takes place at the sub-group level since 30 September 2020. The sub-group comprises the companies in the Bank Group

In addition to Länsförsäkringar Bank AB, Gamla Länsförsäkringar AB has the subsidiaries of Länsförsäkringar Fondliv Försäkrings AB, Länsförsäkringar Sak Försäkrings AB and Länsförsäkringar Liv Försäkrings AB. These companies are not subject to prudential requirements for credit institutions and are thus not included in the consolidated situation. They are instead subject to the solvency rules for insurance companies. Only capital from companies included in the Consolidated Situation may be included in own funds. The capital adequacy rules impose requirements that investments in financial entities above a certain level are to be deducted from own funds. For more information about the Group, refer to Gamla Länsförsäkringar AB's Annual Report.

There is no current or foreseen material practical or legal impediment in the consolidated situation for transferring funds from own funds or repayment of liabilities between parent company and subsidiary.

Figure 2.1 Legal entities in the Consolidated Situation



All of the Boards of Directors of the companies have their registered offices in Stockholm.

Table 2.1 Carrying amount and Parent Company's participating interests

Company name	Carrying amount SEK M	Parent Company's participating interest (%)	Corporate Registration Number	Consolidation method
Gamla Länsförsäkringar AB Parent Company				
Länsförsäkringar Bank AB	9,229.6	100	516401-9878	Complete
Länsförsäkringar Fondliv Försäkrings AB	5,305.4	100	516401-8219	Deducted from own funds
Länsförsäkringar Sak Försäkrings AB	3,206.5	100	502010-9681	Deducted from own funds
Länsförsäkringar Liv Försäkrings AB	8.2	100	516401-6627	Deducted from own funds
Länsförsäkringar Bank AB Parent Company				
Länsförsäkringar Hypotek AB	8,560.5	100	556244-1781	Complete
Länsförsäkringar Fondförvaltning AB	165.0	100	556364-2783	Complete
Wasa Kredit AB	1,039.8	100	556311-9204	Complete

# 3 | Risk management and risk governance

This section outlines the Consolidated Situation's risks and the Board's risk appetite. It also explains how risks are managed in the business based on the Consolidated Situation's risk-management and risk-governance system.

#### **3.1 CONSOLIDATED SITUATION'S RISKS**

Risks are a natural element of a bank's business activities and are defined in the Risk Policy as the possibility of negative deviations from an expected financial outcome.

A summary of the Consolidated Situation's main risks is presented below

#### Table 3.1 Consolidated Situation risks

Out Production and Control to the Control of Control of Control
Credit risk pertains to the risk of losses arising due to counterparties being unable to fulfil their undertakings and of any collateral provided not covering the receivable, leading to a loss. Credit risk encompasses lending risk, issuer risk, counterparty risk, settlement risk and creditworthiness risk.
Market risk pertains to the risk of loss arising that is directly or indirectly caused by changes in the level or volatility in the market price of assets, liabilities and financial instruments, including losses caused by shortcomings in the matching between assets and liabilities. Market risk includes interest-rate risk, currency risk, credit-spread risk, equities risk, property risk, option risk and pension risk.
Liquidity risk is defined as the risk that payment commitments cannot be fulfilled due to insufficient cash funds. Liquidity risk includes structural liquidity risk, financing risk, rollover risk and intraday liquidity risk.
Operational risk refers to the risk of losses arising due to inadequate or failed internal processes, human error, erroneous systems or external events, including legal risks. Operational risk includes product and process risk, personnel risk, security risk,, legal risks, compliance risks, IT risks and model risk.

Business risk pertains to the risk of lower earnings, higher expenses

Climate risk refers to the risks that the consequences of climate

change may have on the business activities. Climate risks can

materialise either through physical risks, such as more cases of extreme weather and gradually rising sea levels, or through

transition risks, such as regulatory, political and market changes

or loss of confidence from customers or other stakeholders. Business risk encompasses strategic risk, reputation risk and

#### **3.2 RISK APPETITE**

**Business risk** 

Climate risk

conduct risk

The risk appetite is defined as the overall level per risk type to which the Consolidated Situation intends to be, and can be, exposed in order to achieve established strategic targets. The Board approves both the Consolidated Situation's risk appetite and the strategic targets that form the basis of the Consolidated Situation's risk strategy. The Consolidated Situation is to expose itself only to those risks necessary for achieving established targets. The Consolidated Situation's risk appetite is to be characterised by a low risk profile whose lending operations focus on private housing and family-

related to the transition to a low-carbon society.

owned agricultural operations. Risk is limited within the framework of the risk limits established by the Board.

### 3.3 RISK-MANAGEMENT SYSTEM AND INTERNAL-CONTROL FUNCTIONS

The Consolidated Situation has an effective risk-management system, comprising risk frameworks and risk-management processes that ensure correct monitoring, management and reporting of the Consolidated Situation's risks. A well-functioning risk-management system aims to maintain a healthy risk culture throughout the entire operations and ensure that the Board has an objective and clear understanding of the overall risk profile of the operations.

#### 3.3.1 Three lines of defence

The Consolidated Situation's risk management follows the division of roles and responsibilities according to the three lines of defence:

#### First line of defence

The first line of defence pertains to all risk-management activities performed in the business operations. The operations that are exposed to risk also own the risk, which means that the daily risk management takes place within the operations. The operations are also responsible for ensuring that control processes for monitoring are in place, implemented and reported. All employees assume individual responsibility for working towards a well-functioning risk culture by complying with the established risk-management guidelines and framework.

#### Second line of defence

The second line of defence pertains to the independent Risk Management and Compliance functions, which establish principles and frameworks for risk management and regulatory compliance. Accordingly, duality in risk management and risk control, risk culture and risk awareness is prevalent in all day-to-day business decisions. Risk Management controls and monitors arising risks and ensures that risk awareness and correct and consistent risk management takes place on a daily basis. Risk Management also provides assistance when the operations introduce procedures, systems and tools for maintaining this continuous risk management. The role of compliance is to provide support and control for ensuring that the operations comply with regulatory requirements.

#### Third line of defence

The third line of defence is Internal Audit, which comprises the Board's support for quality assurance and evaluation of the organisation's risk management, governance and internal controls. Internal Audit performs independent and regular audits to control, evaluate and ensure, for example, the procedures and processes for financial reporting, the operation and management of information systems and the operations' risk-management system.

#### 3.3.2 Risk-management system

The risk-management system consists of strategies, processes, procedures, internal rules, limits, controls and reporting procedures needed to ensure that the Consolidated Situation is able to continuously identify, measure, govern, report and have control over the risks to which the operations are, or could be expected to become, exposed to, and the interdependence of these risks.

All risk activities are based on the risk framework that is adopted by the Board. The risk framework is described in governance documents, including a risk policy, a policy for risk and risk limits, and quidelines for the independent Risk Management function.

The Consolidated Situation's risk framework is designed to meet internal needs, sound market practice and regulatory requirements. Accordingly, the risk framework is an integrated part of the decision-making processes and contributes to achieving the business objectives with a high degree of certainty.

The Consolidated Situation manages and evaluates its exposure to the risks to which its operations are exposed on the basis of:

- Clear and documented descriptions of processes and procedures.
- Clearly defined and documented responsibilities and authorities.
- Risk-measurement methods and system support that are customised to the requirements, complexity and size of the operations.
- Regular incident reporting of the operations according to a documented process.
- Sufficient resources and expertise for attaining the desired level of quality in both the business and control activities.
- Documented and communicated business contingency, continuity and recovery plans.
- Clear instructions for each respective risk area and a documented process for approving new or considerably amended products, services, markets, processes and IT systems, as well as major changes to operations and organisation.

#### **3.4 RISK GOVERNANCE**

The Consolidated Situation's risk governance is based on governance documents adopted by the Board and a clear decision process in the operations.

#### **Board of Directors**

The Board is responsible for ensuring that an efficient risk-management system is in place and that it is customised to the Consolidated Situation's risk profile. The Board determines risk appetite and risk limits by adopting relevant governance documents. The Board approves all significant elements of the internal models used within the Consolidated Situation and is also responsible for ensuring that regulatory compliance and risks are managed in a satisfactory manner through the independent Risk Management, Compliance and Internal Audit functions.

The Board's Risk and Capital Committee supports the Board in risk and capital issues, and prepares cases ahead of Board decisions, for example, regarding market, liquidity, credit and operational risk, and capital and financing matters.

#### **President**

The President is responsible for ensuring that daily management takes place in accordance with the strategies, guidelines and governance documents established by the Board.

The President also ensures that the methods, models, systems and processes that form the internal measurement and control of identified risks work in the manner intended and decided by the Board. The President is to continuously ensure relevant reporting from each unit, including Risk Management, to the Board. The President is the Chairman of the Asset Liability Committee (ALCO), which follows up on capital and financial matters, as well as the Chairman of the Risk Committee, which follows up on all risks, appetites, limits and internally assessed capital requirements.

#### **Operations**

Company managers have the overall responsibility for day-to-day risk management in their respective areas and for ensuring that such risk management takes place in accordance with the risk framework. The operations assume risk and also own the risk.

#### Risk Management

The task of Risk Management is to provide support to the business, Board, President and management to ensure that proper risk management and risk control have been carried out for all business operations and to assess that risks are managed in line with the risk framework established by the Board. Risk Management is to carry out its activities independently from the business activities.

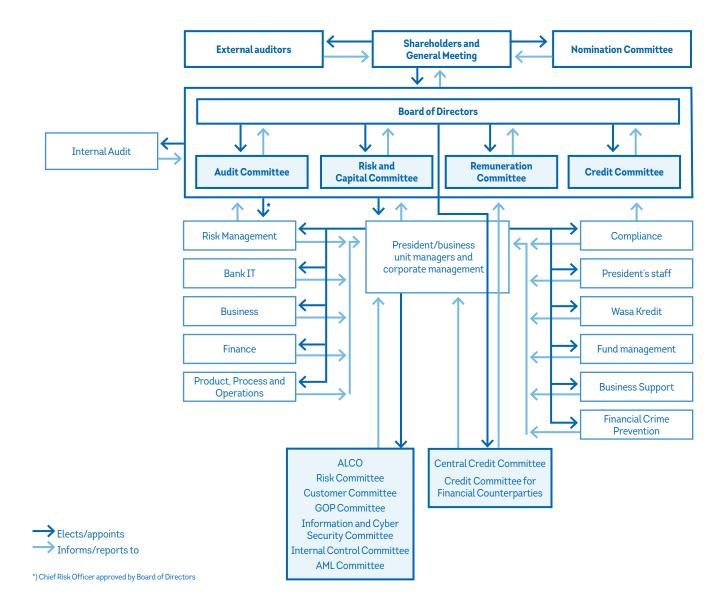
The individual responsible for Risk Management is the Chief Risk Officer (CRO), who is directly subordinate to the President and reports directly to the President, the Risk and Capital Committee, Audit Committee and the Board. The Board approves the appointment and replacement of the CRO. Risk Management's areas of responsibility are defined and documented in the guidelines adopted by the Board. Risk Management is also responsible for the Consolidated Situation's capital-adequacy process.

#### 3.4.1 Monitoring and reporting

Risk Management reports on the Consolidated Situation's risk development to the Board, the Risk and Capital Committee, the Risk Committee, the ALCO and the President.

Monitoring risks is a significant part of the Consolidated Situation's ongoing operations. Controls and risk reports of market and liquidity risk and credit risk with financial counterparties take place every day. Other types of risk reporting take place on an ongoing basis. In addition, an aggregated risk and capital report, containing all risk areas, is submitted to the Board and the Board's Committees every quarter.

Figure 3.1 Länsförsäkringar Bank's governance structure



# 4 | Capital management

In accordance with the CRR (575/2013), the Consolidated Situation includes the parent mixed financial holding company Gamla Länsförsäkringar AB, in addition to the Bank Group. The Financial Supervisory Authority has decided that, from the third quarter, Länsförsäkringar Bank and its subsidiaries are also to be consolidated at the sub-group level (sub-consolidated basis). The sub-group comprises Länsförsäkringar Bank and its subsidiaries, that is to say the Bank Group. An effect of the sub-consolidated basis is that a larger portion of Länsförsäkringar Bank's externally issued capital instruments qualifies for inclusion in own funds in the Consolidated Situation.

#### 4.1 CAPITAL ADEQUACY

Capital requirements are divided into Pillar I requirements, which are general minimum requirements for all institutions, and Pillar II requirements that are based on individual assessments performed by each institution. The minimum capital requirements under Pillar I are expressed as a percentage of the Risk Exposure Amount (REA), which at all times must meet the following:

- A Common Equity Tier 1 capital ratio of 4.5%
- A Tier 1 ratio of 6%
- A total capital ratio of 8%

Alongside the minimum capital requirement, there are additional capital requirements in the form of a combined buffer. These capital buffers are regulated in the Swedish Capital Buffers Act (2014:966). The combined buffer requirement is comprised of several different buffers: the other systemically important institutions buffer (O-SII buffer), the systemic risk buffer, the countercyclical capital buffer and the capital conservation buffer. If the combined buffer requirements are breached, restrictions are introduced on paying dividends and interest payments on Additional Tier 1 instruments. The Consolidated Situation and the Bank Group are subject to the requirements of satisfying a capital conservation buffer of 2.5% and a countercyclical capital buffer which is currently 0% as per 31

December 2020. There is the additional requirement that institutions are to make their own assessments of their internal capital requirement, usually named Pillar II, which is to include a margin for the risks that the institution is exposed to but that are not managed under Pillar I. Capital requirements are described in detail in section 4.3 below

As presented in Table 4.1, the Consolidated Situation's Common Equity Tier 1 capital ratio on 31 December 2020 amounted to 16.7% (15.4) and the total capital ratio to 19.1% (16.6). The Bank Group's Common Equity Tier 1 capital ratio on 31 December 2020 amounted to 14.9% (13.9) and the total capital ratio to 19.3% (18.5).

#### Internal capital and liquidity adequacy assessment processes

The Consolidated Situation and the Bank Group's internal capital adequacy assessment process (ICAAP) is part of the capital planning and is to ensure that the operations, at any given time, have a sufficiently large amount of capital in relation to its current and future risk exposure level. A buffer of the statutory minimum capital requirements, the owner's yield requirements and external requirements from investors and rating agencies are taken into account in capital planning in addition to the assessment of the Consolidated Situation and the Bank Group's internal capital requirements performed under the ICAAP. The ICAAP is also to take the development of the operations into consideration. A capital forecast is prepared when the capital requirement is determined and reported four times a year to the ALCO, the Risk and Capital Committee and the Board. The forecast is prospective and is to provide a view of the capital requirements over both the long and the short term. The purpose of the forecast is to ensure that the Consolidated Situation and the Bank Group have sufficient own funds and the correct capital composition.

The CRO of Länsförsäkringar Bank is responsible for coordinating the process work that leads to an ICAAP for the Consolidated Situation and the Bank Group and forms the basis of business plan-

Canadidated Cituation

Table 4.1 Trend in capital adequacy measures

	Consol	idated Situation	Bank Group		
SEK M	31 Dec 2020	31 Dec 2019	31 Dec 2020	31 Dec 2019	
Common Equity Tier 1 capital	21,474.6	18,740.3	16,455.9	14,633.1	
Tier l capital	22,775.3	19,483.8	18,655.9	16,833.1	
Tier 2 capital	1,743.7	768.1	2,589.7	2,589.7	
Own funds	24,519.1	20,251.9	21,245.6	19,422.7	
Risk Exposure Amount	128,602.5	121,827.0	110,316.0	104,924.9	
Capital requirement	10,288.2	9,746.2	8,825.3	8,394.0	
Common Equity Tier 1 capital ratio	16.7%	15.4%	14.9%	13.9%	
Tier l ratio	17.7%	16.0%	16.9%	16.0%	
Total capital ratio	19.1%	16.6%	19.3%	18.5%	
Capital conservation buffer	3,215.1	3,045.7	2,757.9	2,623.1	
Countercyclical capital buffer	0.0	3,045.7	0.0	2,623.1	

ning and Board decisions concerning capital policy and forecasts. The Consolidated Situation and the Bank Group's ICAAP is designed based on the requirements of the capital adequacy regulations and the requirements established by the Board of Directors for the operations. The process, which is to be performed at least once annually, is to be documented in respect of the approach taken, the implementation and the results of the ICAAP, and reported to the Swedish Financial Supervisory Authority in accordance with its supervisory review and evaluation. The process includes the following activities:

- Identifying all risks
- Risk assessment
- Stress tests
- Capital calculations

All of the operations' identified risks are included in the calculation of the capital requirements in the ICAAP. The Consolidated Situation and the Bank Group apply methods used to calculate the capital requirement under the framework of Pillar I. For risks not included in Pillar I, known as Pillar II risks, internal models are used to allocate a capital requirement to each risk. The following additional risks are taken into account in the calculation of capital requirements under the Pillar II framework:

- Credit-related concentration risk
- Credit risk in exposures to governments
- Market risk, comprising currency risk, interest-rate risk in the bank book and spread risk
- Pension risk

The Financial Supervisory Authority's method for assessing the total capital requirement also includes the capital conservation buffer and the countercyclical capital buffer for the Consolidated Situation and the Bank Group.

The internal capital requirement provides a view of the Consolidated Situation and the Bank Group's current position. Scenario analyses and stress tests are performed under the ICAAP framework to ensure that the Consolidated Situation and the Bank Group are well-capitalised for the future. The basic prerequisites for stress tests are to be decided by the Board of Directors at least once annually. This discussion provides guidance for the continuing work involving stress tests. Work on stress tests is based on a number of scenarios and the impact of these scenarios on the risks of the operations. The base scenario is based on the business plan and the most probable trend in volumes, earnings and credit losses. Assumptions in this base scenario are stress-tested by applying the most unfavourable conditions in the external business world for the Consolidated Situation that could be expected to occur once every 20-25 years. The purpose of the stress-test scenario is to ensure that the amount and composition of own funds are sufficient to absorb losses arising as a result of a serious financial stress. The performance in this scenario forms the basis for calculating a capital planning buffer by taking into account the change in the capital requirement and own funds. The capital planning buffer comprises the part of the capital requirement that exceeds the capital conservation buffer.

The Consolidated Situation and the Bank Group also carry out an ILAAP every year, with the aim of ensuring a satisfactory liquidity situation, and robust strategies and processes to manage liquidity

risk over time. The ILAAP describes the internally assessed liquidity requirements and the liquidity reserve that the Bank Group has at its disposal, in relation to the liquidity and financing risk to which the operations are exposed.

#### **4.2 OWN FUNDS**

Own funds is the total of Tier 1 capital and Tier 2 capital, less items indicated in the capital adequacy rules.

Tier 1 capital comprises the institution's Common Equity Tier 1 capital and a limited share of perpetual subordinated debt (Tier 1 instruments). Common Equity Tier 1 capital comprises equity according to applicable accounting regulations with deductions for certain items as defined in the capital adequacy rules.

Tier 2 capital comprises perpetual and dated loans with subordinated preferential rights.

#### Common Equity Tier 1 capital

Equity comprises share capital, capital contributed, reserves and net profit for the year. During the period, equity included in the Common Equity Tier 1 capital in the Consolidated Situation increased net, primarily due to profit generated from the Bank Group. Profit may be included prior to a decision by a general meeting only if approved by the Swedish Financial Supervisory Authority, after deductions have been made for proposed dividends or other foreseeable charges and the company's auditors have verified the profits. A deduction for the expected, proposed dividend from the Parent Company Gamla Länsförsäkringar AB to the shareholders of SEK 698 M was made from Common Equity Tier 1 capital at year-end.

Changes in equity attributable to cash flow hedges may not be included in own funds, which is why this effect is excluded. Common Equity Tier 1 capital is also adjusted due to the regulatory requirements regarding prudent valuation of items measured at fair value. Adjustments for the IRB deficit when, according to the accounts, the reserves for credit losses ("loss allowance") are less than the expected losses in capital adequacy, are to be made within Common Equity Tier 1 capital. If the reserves in the accounts exceed the expected loss, a limited portion may be included in the Tier 2 capital. IRB surplus and IRB deficit are evaluated separately for the defaulted and non-defaulted portfolio.

Common Equity Tier 1 capital is to be reduced by deductions for significant investments in financial companies if the invested capital comprises Common Equity Tier 1 instruments and exceeds 10% of gross Common Equity Tier 1 capital, or 17.65% of the net Common Equity Tier 1 capital when aggregated with deferred tax assets. Amounts under the threshold are risk-weighted at 250%. The deduction in the Consolidated Situation derives from Gamla Länsförsäkringar AB's holdings in the insurance sector.

Deferred tax assets recognised in the balance sheet are to reduce Common Equity Tier 1 capital if they meet certain criteria and exceed certain threshold amounts. The deferred tax assets that existed on 31 December 2020 did not give rise to any deduction but are included in the calculation of the threshold levels above. Other deductions from Common Equity Tier 1 capital that are applicable to the Consolidated Situation are intangible assets and goodwill. Common Equity Tier 1 after applicable deductions amounted to SEK 21,475 M (18,740) in the Consolidated Situation. Common Equity Tier 1 capital in the Bank Group amounted to SEK 16,456 M (14,633).

Table 4.2 Own funds and capital requirements

_	Consolidat	ted Situation	Bank Group		
SEKM	31 Dec 2020	31 Dec 2019	31 Dec 2020	31 Dec 2019	
Common Equity Tier 1 capital: instruments and reserves					
Capital instruments and the related share premium accounts	6,513.4	6,513.4	2,864.6	2,864.6	
of which: share capital	1,042.5	1,042.5	2,864.6	2,864.6	
Retained earnings	16,701.5	14,818.0	5,173.5	11,740.8	
Accumulated Other comprehensive income	4,204.7	4,220.9	8,152.2	234.0	
Independently reviewed interim profits net of any foreseeable charge or dividend	1,501.4	1,245.2	1,425.9	1,427.9	
Common Equity Tier 1 capital before regulatory adjustments	28,921.0	26,797.4	17,616.1	16,267.3	
Common Equity Tier 1 capital: regulatory adjustments					
Additional value adjustments	-67.6	-63.0	-64.7	-60.5	
Intangible assets (net related tax liability)	-1,764.6	-1,968.3	-936.7	-1,252.0	
Fair value reserves related to gains or losses on cash flow hedges	258.9	170.1	258.9	170.1	
Negative amounts resulting from the calculation of expected loss amounts	-417.7	-491.8	-417.7	-491.8	
Direct, indirect and synthetic holdings by the institution of Common Equity Tier 1 instruments of financial sector entities where the institution has a significant investment in those entities	-5,455.4	-5,704.0	_	-	
Amounts exceeding threshold of 15%	-	-	-	-	
of which: direct, indirect and synthetic holdings by the institution of Common Equity Tier 1 instru- ments of financial sector entities where the institution has a significant investment in those enti- ties	_	_	-	-	
of which: deferred tax assets arise from temporary differences	-	-	-	-	
Total regulatory adjustments to Common Equity Tier 1 capital	-7,446.4	-8,057.1	-1,160.2	-1,634.2	
Common Equity Tier 1 capital	21,474.6	18,740.3	16,455.9	14,633.1	
Additional Tier 1 capital: instruments					
Capital instruments and the related share premium accounts	-	_	2,200.0	2,200.0	
of which: classified as equity within the meaning of the applicable accounting standards	-	-	2,200.0	2,200.0	
Qualifying Tier 1 capital included in consolidated Additional Tier 1 capital issued by subsidiaries and held by third parties	1,300.7	743.4	-	-	
Additional Tier 1 capital	1,300.7	743.4	2,200.0	2,200.0	
Tier 1 capital (Tier 1 capital = Common Equity Tier 1 capital + Additional Tier 1 capital)	22,775.3	19,483.8	18,655.9	16,833.1	
Tier 2 capital: instruments and provisions					
Capital instruments and the related share premium accounts	-	-	2,589.7	2,589.7	
Qualifying own funds instruments included in consolidated Tier 2 capital issued by subsidiaries and held by third parties	1,743.7	768.1	-	-	
Tier 2 capital	1,743.7	768.1	2,589.7	2,589.7	
Total capital (total capital = Tier 1 capital + Tier 2 capital)	24,519.1	20,251.9	21,245.6	19,422.7	
Total risk-weighted assets	128,602.5	121,827.0	110,316.0	104,924.9	
Capital ratios and buffers					
Common Equity Tier 1 capital (as a percentage of total risk exposure amount)	16.7%	15.4%	14.9%	13.9%	
Tier 1 capital (as a percentage of total risk exposure amount)	17.7%	16.0%	16.9%	16.0%	
Total capital (as a percentage of total risk exposure amount)	19.1%	16.6%	19.3%	18.5%	
Institution-specific buffer requirements	7.0%	9.5%	7.0%	9.5%	
of which: capital conservation buffer requirement	2.5%	2.5%	2.5%	2.5%	
of which: countercyclical capital buffer requirement	0.0%	2.5%	0.0%	2.5%	
of which: systemic risk buffer requirement	-	-	-		
of which: Global Systemically Important Institution or Other Systemically Important Institution buffer	_	-	_	-	
Common Equity Tier 1 capital available to meet buffers (as a percentage of risk exposure amount)	11.1%	8.6%	10.4%	9.4%	

Presentation of own funds in accordance with Article 5 of the European Commission Implementing Regulation (EU) No 1423/2013.

There are no items encompassed by the provisions applied before Regulation (EU) No 575/2013 or any prescribed residual amounts under the Regulation. Empty rows in the presentation template in the Regulation have been excluded to provide a better overview.

#### Tier 1 capital

Additional Tier 1 capital in the Consolidated Situation solely comprises Additional Tier 1 capital. Additional Tier 1 capital is subordinated liabilities which fulfil certain conditions in order to be included as Tier 1 capital when calculating the size of own funds. Länsförsäkringar Bank issued two Additional Tier 1 Capital loans totalling SEK 2,200 M (2,200), see table 4.2. However, when consolidated own funds are compiled, Tier 1 instruments issued by Länsförsäkringar Bank may only be included to the extent required to cover the Bank Group's Tier 1 capital requirements, including Pillar II and the buffer requirements. Eligible Tier 1 capital amounted to SEK 1,301 M (743).

#### Tier 2 capital

Tier 2 capital must be subordinate to other claims of all nonsubordinated creditors, except for equity instruments and Additional Tier 1 capital. Fixed-term subordinated debt that is included may not be covered or guaranteed in any form by an issuing institution or institution in the consolidated situation. Tier 2 capital comprises fixed-term subordinated debt issued by Länsförsäkringar Bank. The instruments are subject to the same rules as for Tier 1 instruments above. Eligible Tier 2 capital amounted to SEK 1,744 M (768). Own funds and capital requirements are presented in Table 4.2.

#### **4.3 CAPITAL REQUIREMENT**

#### Risk Exposure Amount (REA)

The advanced Internal Ratings-based Approach (A-IRB) for retail exposures is applied in order to calculate REA. The Foundation IRB Approach (F-IRB) is used for exposures to corporates and the Standardised Approach is used for other exposure classes. The Standardised Approach is applied to the calculation of capital requirements for operational risk and credit valuation adjustment risk.

As shown in Table 4.5, total REA amounted to SEK 128,603 M (121,827) in the Consolidated Situation and to SEK 110,316 M (104,925) in the Bank Group on 31 December 2020. The increase in

REA was mainly attributable to continued growth in lending, primarily to households in the form of mortgages, which also increases REA in accordance with the Financial Supervisory Authority's macroprudential measures under the framework of Article 458 of the CRR. REA for operational risk has increased since the preceding year due to the annual upward adjustment of the income included in the calculation according to the Standardised Approach.

#### **Buffer requirement**

The purpose of the capital conservation buffer is that it can be used during critical periods and is to amount to 2.5% of REA, which corresponded to SEK 3,215 M (3,046) on 31 December 2020. The aim of the countercyclical capital buffer is to strengthen banks' resilience and ensure that sufficient capital exists for maintaining access to credit during stressed scenarios in the financial system. The Financial Supervisory Authority lowered the countercyclical capital buffer during the year from 2.5% to 0%. Both buffers are to be covered by Common Equity Tier 1 capital. The Pillar I capital requirement for the Consolidated Situation and the Bank Group amounted to 10.5% (13.0), including the capital conservation buffer and countercyclical capital buffer.

#### Internally assessed capital requirement

The internally assessed capital requirement comprises the minimum capital requirement under Pillar I and the capital requirement for risks managed under Pillar II. The internally assessed capital requirement on 31 December 2020 amounted to SEK 12,220 M (11,710) for the consolidated situation and to SEK 10,560 M (10,132) for the Bank Group.

Own funds that meet the capital requirement under the Pillar I and Pillar II requirements, including buffers, amounted to SEK 24,519 M for the Consolidated Situation and SEK 21,246 for the Bank Group. Table 4.3 presents outstanding subordinated loans on 31 December 2020

Table 4.3 Outstanding subordinated loans 31 December 2020

Borrower	Loan amount	Loan date	Repayment date	Premature redemption (break-off date)
Additional Tier 1 capital - External				
Länsförsäkringar Bank AB	SEK 1,000 M	10 Apr 2019	Perpetual	10 Apr 2024
Länsförsäkringar Bank AB	SEK 1,200 M	19 Nov 2020	Perpetual	19 Nov 2025
Tier 2 capital - External				
Länsförsäkringar Bank AB	SEK 500 M	26 April 2016	26 April 2026	26 April 2021
Länsförsäkringar Bank AB	SEK 1,000 M	26 April 2016	26 April 2026	26 April 2021
Länsförsäkringar Bank AB	SEK 400 M	1 Mar 2018	1 Mar 2028	1 Mar 2023
Länsförsäkringar Bank AB	SEK 700 M	1 Mar 2018	1 Mar 2028	1 Mar 2023

Disclosures on own funds are found on the Länsförsäkringar Bank AB website.

#### **4.4 LEVERAGE RATIO**

The leverage ratio is a non-risk-based metric that establishes a floor for how low the capital requirement can fall in relation to a bank's gross assets. The leverage ratio on 31 December 2020 amounted to

5.3% (4.9) for the Consolidated Situation and 4.4% (4.3) for the Bank Group.

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Table 4.4 Leverage ratio

	Consolidate	d Situation	Bank (	Froup
	31 Dec 2020	31 Dec 2019	31 Dec 2020	31 Dec 2019
Leverage ratio exposure, SEK M				
Securities financing transactions: Exposure value according to Article 429	1,935	-	1,935	-
Securities financing transactions: Add-on for counterparty risks	1	-	1	-
Derivatives: Current replacement cost	4,829	7,708	4,829	7,708
Variation margin	-2,458	-2,569	-2,458	-2,569
Derivatives: Add-on under the mark-to-market method	3,543	3,818	3,543	3,818
Off-balance sheet items, conversion factor applied	14,055	12,769	13,917	12,627
Other assets	416,234	386,074	402,262	372,472
Asset amount deducted - Tier 1 capital	-7,638	-8,164	-1,354	-1,744
Other adjustments	-201	-29	-201	-29
Total Leverage ratio exposure	430,299	399,608	422,472	392,284
Tier1capital	22,775	19,484	18,656	16,833
Leverage ratio	5.3%	4.9%	4.4%	4.3%

#### 4.5 NEW AND AMENDED RULES

#### Capital adequacy rules Impending changes to capital adequacy rules

In December 2020, the Swedish parliament decided to change the capital adequacy rules due to the implementation of the EU banking package. The aim of the banking package is to increase the harmonisation of the provisions of the Capital Adequacy and Crisis Management Directives, and also includes amendments and supplements to the Capital Requirements Regulation, the Capital Adequacy and Crisis Management Directives. Changes to the laws on the management of financial companies in crisis are expected to come into force mid-2021. The previously approved amendments to the Capital Requirements Regulation will start to apply from 28 June 2021 and will include a minimum leverage ratio and net stable funding ratio (NSFR).

In November 2020, the Swedish Financial Supervisory Authority decided on the changes it intends to introduce when the banking package is applied. These changes refer to how the Authority will apply the new capital requirements and compass, for example, Pillar II and a minimum leverage ratio. According to the banking package's rules, the Authority is to decide on a Pillar II requirement and provide guidance on which capital level the bank is expected to hold, over and above the minimum capital requirement, to be able to manage future financial stresses. The Authority also intends to apply a minimum leverage ratio of 3% over the risk-weighted requirement of 8%. In addition to this minimum requirement, the Authority will set additional leverage ratio requirements in the form of guidance. A decision on the Pillar II requirements and the announcement of Pillar II guidance will be made after the Authority has individually reviewed and evaluated each bank.

In December 2020, the Authority decided to extend the application of the risk weight floor of 25% for Swedish mortgages by one year. The decision applies from 30 December 2020 until 3

ber 2021. A proposal on completing the Basel III regulations is expected in 2021. The original proposal published by the Basel Committee in 2017 entails major changes for banks and includes restrictions on the use of internal models, changes to the Standardised Approach for both credit and operational risk as well as the introduction of a capital floor of 72.5%. The capital floor entails that the risk-weighted assets for a bank that applies internal models may not, in total, be lower than 72.5% of the risk-weighted amount calculated according to the Standardised Approach. The new rules are expected to take effect in 2023 with a phase-in period of five years.

The European Banking Authority (EBA) has developed new regulations for reducing unwanted variability in capital requirements when using internal models for calculating the capital requirements for credit risk. The banks need to make adjustments to these regulatory changes and apply for significant changes to internal ratings-based approaches (IRB). The new standards include a new definition of default and estimates of PD and LGD, which will be introduced not later than 2021. Combined, this will entail extensive changes for many banks.

#### New EU rules on covered bonds

In November 2019, the EU decided on new regulations regarding covered bonds. The aim of the regulations is to create standardised rules for covered bonds within the EU. An inquiry into incorporating the regulations into Swedish law was published in November 2020. The new regulations include introducing a separate requirement for a cover pool liquidity buffer, which is to cover the net liquidity outflow of the bonds for a period of 180 days. A higher match funding requirement is also proposed, meaning the degree to which the value of the cover pool is to exceed the nominal value of the covered bonds. The requirement entails a rise from the current level of 2% to 5%. The new rules are expected to take effect in 2022.

#### Crisis management

Sweden has had new rules for managing failing banks since 2016. These rules are based on the Crisis Management Directive. The key aim is to prevent banks' problems from becoming a burden for the tax payer. The rules establish a special procedure for handling a failing institution without putting it into bankruptcy. This procedure is called resolution. It means that the government, through the National Debt Office, can take control of the failing bank. The Debt Office has a number of tools available to reconstruct or discontinue banks in a structured manner. To facilitate efficient resolution, the Debt Office has prepared resolution plans for the institutions that it considers have critical operations for the financial system. As part of its work, the Debt Office will determine minimum requirements for own funds and eligible liabilities that can be used to cover losses in a failing institution. In December 2020, the Debt Office announced its decisions on resolution plans and minimum requirements for own funds and eligible liabilities (MREL) for the institutions that have

business activities that are deemed to be critical to the Swedish financial system, including Länsförsäkringar Bank. The Debt Office decided on an MREL at group level. The liabilities issued that may be used to meet the requirements are to be issued by Länsförsäkringar Bank. In addition, the Debt Office also made a decision on a minimum requirement for the individual institutions Länsförsäkringar Bank, Länsförsäkringar Hypotek and Wasa Kredit. The Debt Office's decision on MREL involves only the amount of the minimum requirement. The MREL for the Consolidated Situation is 5.9% of total liabilities and own funds. On 31 December 2020, Länsförsäkringar Bank had SEK 31.2 billion in eligible liabilities with a remaining term of more than one year, which exceeded the minimum requirement by a healthy margin.

Länsförsäkringar Bank is following regulatory developments and is highly prepared and well capitalised for impending changes, even if it is unclear at this stage what the effects of a capital requirement will be.

Table 4.5 Risk Exposure Amount and capital requirements

		ted situation ec 2020		ted Situation ec 2019		Group c 2020	Bank Group 31 Dec 2019	
SEK M	Risk Exposure Amount	Capital requirement	Risk Exposure Amount	Capital requirement	Risk Exposure Amount	Capital requirement	Risk Exposure Amount	Capita requirement
Credit risk according to Standardised Approach (SA)								
Exposures to institutions	1,595.8	127.7	1,916.9	153.4	1,555.7	124.5	1,872.7	149.8
Exposures to corporates	2,189.4	175.2	2,289.2	183.1	2,188.5	175.1	2,290.7	183.3
Retail exposures	2,244.7	179.6	2,111.0	168.9	2,244.7	179.6	2,111.0	168.9
Defaulted exposures	33.4	2.7	26.5	2.1	33.4	2.7	26.5	2.1
High risk items	0.4	0.0	0.4	0.0	0.4	0.0	0.4	0.0
Covered bonds	3,869.5	309.6	3,635.0	290.8	3,577.0	286.2	3,384.2	270.7
Equity exposures	6,838.3	547.1	6,220.8	497.7	103.3	8.3	102.1	8.2
Other items	3,793.4	303.5	3,366.5	269.3	1,814.4	145.1	1,279.5	102.4
Total Risk Exposure Amount and capital requirements (SA)	20,565.0	1,645.2	19,566.2	1,565.3	11,517.3	921.4	11,067.0	885.4
Credit risk according to IRB Approach (IRB) Retail exposures								
Secured by immovable property, small and medium-sized businesses	2,773.5	221.9	2,616.4	209.3	2,773.5	221.9	2,616.4	209.3
Secured by immovable property, other	16,089.0	1,287.1	15,567.8	1,245.4	16,089.0	1,287.1	15,567.8	1,245.4
Other retail exposures, small and medium-sized businesses	4,598.9	367.9	4,573.5	365.9	4,598.9	367.9	4,573.5	365.9
Other retail exposures	6,890.1	551.2	7,193.6	575.5	6,890.1	551.2	7,193.6	575.5
Total retail exposures (IRB)	30,351.5	2,428.1	29,951.3	2,396.1	30,351.5	2,428.1	29,951.3	2,396.1
Exposures to corporates	8,333.7	666.7	8,689.1	695.1	8,333.9	666.7	8,689.3	695.1
Total Risk Exposure Amount and capital requirements (IRK)	38,685.2	3,094.8	38,640.4	3,091.2	38,685.5	3,094.8	38,640.7	3,091.3
Operationalrisk								
Standardised Approach	14,813.7	1,185.1	13,543.1	1,083.4	5,574.5	446.0	5,140.0	411.2
Total capital requirement for operational risk	14,813.7	1,185.1	13,543.1	1,083.4	5,574.5	446.0	5,140.0	411.2
Credit valuation adjustment, Standardised Approach	984.9	78.8	1,458.1	116.6	984.9	78.8	1,458.1	116.6
Additional Risk Exposure Amounts according to Article 458 CRR	53,553.8	4,284.3	48,619.2	3,889.5	53,553.8	4,284.3	48,619.2	3,889.5
Total Risk Exposure Amount and capital requirements	128,602.5	10,288.2	121,827.0	9,746.2	110,316.0	8,825.3	104,924.9	8,394.0

### 5 | Credit risk

Credit risk refers to the risk that a counterparty is unable to fulfil its commitments and that any collateral provided does not cover the receivable so that a financial loss arises.

#### **5.1 RISK APPETITE**

The risk-taking for credit risk is based on a sound credit process and the credit portfolio is highly diversified with an overall low risk level. Risk is limited within the framework of the Consolidated Situation's established risk appetites and risk limits.

#### **5.2 RISK MANAGEMENT**

This section presents the credit process, risk-classification system and method for calculating the Consolidated Situation's capital requirement for credit risk.

#### 5.2.1 Credit process

The banking operations impose strict requirements in terms of customer selection, customers' repayment capacity and the quality of collateral.

Länsförsäkringar Bank is responsible for ensuring that lending is carried out according to uniform procedures based on the Board's adopted guidelines, which ensures a common view on loan origination throughout the organisation. The quality of the loan portfolio and borrowers' repayment capacity are continuously monitored and reviewed. Combined with system support for risk classification, this leads to balanced and consistent lending.

The Board's adopted credit regulations form the foundation of all lending that takes place. The size of the loan and level of risk determine the decision level, where the highest instance is the Board and the lowest instance a decision by an advisor. Mandates for granting credit at the respective decision-making instance are set out in the credit regulations.

The credit regulations also set out minimum requirements for underlying documentation for credit-granting decisions. Compliance with the credit regulations is regularly monitored. The credit regulations and credit process, combined with local customer and market knowledge, create a loan portfolio that maintains high credit quality.

#### Temporary mortgage repayment relief due to COVID-19

Länsförsäkringar Bank granted temporary mortgage repayment holidays following guidelines issued by the Financial Supervisory Authority. Based on individual assessment, corporate customers were also granted a repayment holiday or received other liquidity support to manage their temporary liquidity problems. Applications for repayment holidays from corporate customers were mainly related to Wasa Kredit. Applications for temporary mortgage repayment relief were at low levels in the fourth quarter. The total volume of mortgages that were granted repayment holidays due to COVID-19 amounted to SEK 14.1 billion on 31 December 2020. Granted repayment holidays did not entail an automatic transfer to stage 2 in the calculation of expected credit losses. The number of applications received for such repayment holidays was also at a low level in

other lending segments at the end of the year. Most corporate customers awarded such holidays have since returned to following their normal repayment plans.

#### **Environmental and climate risks**

Länsförsäkringar Bank updated a scenario analysis of its mortgage portfolio during the year based on the Task Force on Climate-related Financial Disclosures (TCFD) recommendations. The long-term scenarios of the UN Intergovernmental Panel on Climate Change (IPCC) for 2100 were used to estimate the level of GHG emissions in the atmosphere and based on these scenarios produce an estimate for temperature increases and rises in sea levels. These estimates are based on the Swedish Meteorological and Hydrological Institute's (SMHI) forecasts and were prepared together with Gamla Länsförsäkringar AB's natural catastrophe specialists. Temperature increases and rises in sea levels have a certain impact on households' disposable income and thus their repayment capacity due to higher tax expenses and increased insurance premiums. Rises in sea levels also affect the market value of properties and thus collateral for the bank. However, the results are highly uncertain since the models are based on many assumptions.

Gamla Länsförsäkringar AB published a separate climate-risk report that also includes Länsförsäkringar Bank's operations. The report follows the TCFD's guidelines and is published here: lansforsakringar.se/klimatrapport2020. Environment-related risks are addressed in the loan application process based on, for example, licensable and non-licensable operations and a comprehensive assessment of the company's operations. Risks are subsequently followed up in annual turnovers.

#### 5.2.2 IRB system

An Internal Ratings-based Approach is used in the area of credit risk (IRB Approach) to calculate the capital requirement for credit risk. This complies with the requirements set by the CRR and forms the basis of the IRB risk-classification system. The IRB system is a core component of the credit process and consists of methods, models, processes, controls and IT systems to support and further develop the quantification of credit risks. The IRB system is specifically used in:

- Credit process for risk assessment and credit-granting decisions
- Calculation of loss allowances
- Calculation of risk-adjusted returns
- Monitoring and reporting to management and the Board
- Calculation of capital requirement
- Capital allocation

Some of the core concepts in the IRB system are described below.

#### Exposure at Default (EAD)

Exposure at Default is the exposure amount that the counterparty is expected to utilise upon default. For commitments for on-balance sheet item, EAD is defined as capital liability plus accrued and overdue unpaid interest and fees. For off-balance sheet commitments, EAD is calculated by using a conversion factor, see below.

#### Probability of Default (PD)

The Probability of Default is the probability that a counterparty will default within a 12-month period. A counterparty is considered to be in default if a payment is more than 90 days past due. A counterparty is also considered to be in default if there are other reasons to expect that the counterparty cannot meet its undertakings. The Bank Group has received permission from the Swedish Financial Supervisory Authority to apply a new definition of default that meets the clarification requirements of the EBA's guidelines<sup>1)</sup>. The new definition was implemented in the fourth quarter of 2020. The main change as regards the Group's new definition for default is that all of the companies in the Bank Group now apply the same definition, namely, that a past-due date of 90 days is now defined as being in default.

An initial PD is calculated for each counterparty, adjusted to reflect the average proportion of default over business cycles. Finally, a safety margin is added to the PD to ensure that the risk is not underestimated. Following the calculation of PD, all non-defaulted counterparties are ranked and are divided into eleven risk classes.

The information that is most relevant to each type of counterparty has been taken into consideration in the development of models for estimating PD. The PD estimate for retail exposures is calculated entirely by using models based on predictive statistical analysis, while the PD estimate for exposures to corporates is based on a predictive statistical analysis combined with individual expert assessments. These risk models take both internal and external information into consideration

#### Loss Given Default (LGD)

Loss Given Default is defined as the expected loss percentage of the total counterparty exposure given default.

An internal estimate of LGD is used for the Advanced IRB Approach, which is based on internal information about such factors as loss portions, loan-to-value (LTV) ratio and product type. A safety margin is added to these estimates to ensure that the LGD is not underestimated, before a final LGD adjustment is made to reflect the loss ratio in a period of recession.

#### Conversion Factor (CF)

The Conversion Factor is used to calculate off-balance sheet commitments that are expected to be utilised by the counterparty in the event of default. An internal estimate of CF is calculated for the Advanced IRB Approach, which is based on internal information about such factors as degree of realisation, degree of utilisation and type of product. A safety margin is added to these estimates to ensure that the CF is not underestimated.

#### **Validation**

The entire IRB system is validated every year in accordance with applicable regulation and internally adopted guidelines. The quantitative risk models applied to risk estimates are evaluated based on predictive ability and risk-differentiating properties. Great importance is attached to ensuring that the models are stable over time. In addition to the purely quantitative aspects of the IRB system, the use and integration of the system in the operations is evaluated to ensure that the credit risk is consistently and uniformly measured. The entire validation process is performed by the Risk Management department.

### <sup>1)</sup> EBA/GL/2016/07 Guidelines on the application of the definition of default under Article 178 of Regulation (EU) No 575/2013

#### 5.2.3 Method for calculating capital requirements for credit risk

This section provides an overview of which exposures are subject to each of the respective methods (Standardised Approach and IRB Approach), and the dates on which approval for applying the IRB Approach to each portfolio was received.

#### Standardised Approach (SA)

Exposures calculated according to the Standardised Approach primarily comprise exposures to governments and institutions, and holdings of covered bonds. All holdings in securities have a very high credit rating.

#### Internal Ratings-based Approach (IRB)

The IRB Approach is applied to lending to the retail exposures and exposures to corporates classes<sup>2)</sup>. The Foundation Internal Ratings-Based Approach is applied to exposures to corporates, with PD estimated by using internal models, while prescribed amounts are used for LGD and CF. Permission to apply the IRB Approach was obtained or applied for as follows:

- In December 2006, permission was granted by the Financial Supervisory Authority to apply the IRB Approach to retail exposures. This Approach has been applied to capital requirement calculations since February 2007.
- In December 2009, permission was granted to apply the Foundation IRB Approach to capital requirement calculations for credit risk for companies with agricultural operations, which comprises most of the corporate portfolio. This Approach has been applied since March 2010.
- In May 2012, permission was received to apply the IRB Approach for exposures to corporates, excluding Wasa Kredit AB. This Approach has been applied since June 2012.
- In April 2015, Länsförsäkringar Bank AB and the subsidiary Länsförsäkringar Hypotek AB received permission from the Financial Supervisory Authority to change their IRB model for calculating LGD for loans secured by immovable property. This Approach has been applied to capital requirement calculations since May 2015.
- In April 2015, Länsförsäkringar Bank AB and its subsidiaries Länsförsäkringar Hypotek AB and Wasa Kredit AB received approval for all IRB portfolios in the Bank Group to change the limit for what is classified as retail exposures and exposures to corporates. The new limit has been applied to capital requirement calculations since May 2015.
- In March 2019, the Financial Supervisory Authority granted permission to adjust the PDTTC levels of the models for corporates to meet the requirements of the Authority's new directive<sup>3).</sup>
- In November 2019, the Financial Supervisory Authority granted permission to apply a new definition of default for the Consolidated Situation to meet the requirements of the Authority's new directive. The new definition was implemented in the fourth quarter of 2020.

#### New IRB applications during the year:

 In December 2020, an application was submitted to the Financial Supervisory Authority to change the PD models and validation methods of PD models to achieve compliance with the Authority's new requirements. The application also included the IRB roll-out in Wasa Kredit to the corporate and retail exposure classes for short-term credits.

<sup>&</sup>lt;sup>2)</sup> Some exposures in Wasa Kredit to which the Standardised Approach is applied are included in the IRB roll-out plan approved by the Financial Supervisory Authority.

<sup>3)</sup> Refer to the Swedish Financial Supervisory Authority's memorandum: "FI's supervision of banks' calculations of risk weights for exposures to corporates."

#### **5.3 CREDIT QUALITY**

This section describes the Consolidated Situation's credit risk exposure based on approach, exposure class and geographic and industry distribution. The IRB exposure is also reported specified by risk class and an evaluation of the credit risk models is provided.

The IRB retail exposure increased SEK 23,472 M (7.9%), while exposures to corporates rose SEK 2,085 M (10.3%), primarily due to volume growth in mortgages in the retail segment. Volumes grew while the risk weight level was slightly lower, as shown in Table 5.1.

Table 5.1 Exposure by exposure class

SEKM		31 Dec 2020			31 Dec 2019		Pe	riod average <sup>1)</sup>	
Exposure class	Original exposure	EAD	RW (%)	Original exposure	EAD	RW (%)	Original exposure	EAD	Average RW (%)
Standardised Approach									
Central governments and central banks	21,721	22,812	0	19,814	21,237	0	30,862	32,039	0
Regional governments or local authorities	176	5,214	0	192	4,757	0	193	5,335	0
Exposures to public sector entities	1,153	0	0	1,593	0	0	1,441	0	0
Multilateral development banks	3,641	3,641	0	2,339	2,339	0	3,484	3,484	0
Institutions	19,374	6,485	25	17,068	6,655	29	25,181	6,731	26
Corporates	2,447	2,394	91	2,554	2,531	90	2,661	2,609	90
of which, SMEs	1,565	1,544	87	1,645	1,634	85	1,769	1,748	86
Retail	4,787	2,997	75	4,433	2,817	75	4,639	2,914	75
of which, SMEs	22	21	60	11	11	58	17	16	59
Defaulted exposures	80	33	100	60	25	108	60	21	100
Covered bonds	38,695	38,695	10	36,350	36,350	10	38,143	38,143	10
Exposures associated with particularly high risk	0	0	_	0	0	-	0	0	_
Equity exposures	2,786	2,786	245	2,542	2,542	245	2,710	2,710	245
Other items	3,681	3,681	103	3,271	3,271	103	3,342	3,342	102
Total, Standardised Approach	98,541	88,740	23	90,216	82,524	24	112,716	97,328	21
IRB Approach									
Corporates	22,585	22,356	37	20,456	20,271	43	21,760	21,550	39
of which, SMEs	22,564	22,339	37	20,444	20,262	43	21,742	21,535	39
Retail	326,168	320,666	9	301,591	297,194	10	318,078	312,300	10
of which, SMEs	40,297	39,799	19	38,747	38,280	19	39,734	39,246	18
of which, secured by immovable property	294,365	289,665	7	270,822	267,213	7	286,400	281,428	7
of which, other retail credits	31,802	31,001	37	30,769	29,980	39	31,628	30,872	37
Total, IRB Approach	348,753	343,022	11	322,047	317,465	12	339,838	333,850	11
Total	447,294	431,761	14	412,263	399,989	15	452,554	431,178	14

 $<sup>^{1\!)}</sup>$  Average exposure and risk weight in 2020, calculated by quarter.





Table 5.3 presents credit risk exposure by class and region. 97.7% of total credit risk exposure of SEK 431.8 billion comprises exposure to Sweden.

Table 5.3 Exposure by region and class

31 Dec 2020, SEK M	Sweden	Denmark	Finland	Norway	Switzerland	Germany	Netherlands	Total
Standardised Approach								
Central governments and central banks	21,334	-	129	-	-	1,349	-	22,812
Regional governments or local authorities	4,256	62	897	-	-	-	-	5,214
Multilateral development banks	3,641	-	-	-	-	-	-	3,641
Institutions	2,210	1,443	1,250	479	132	-	972	6,485
Corporates	2,394	-	-	-	-	-	-	2,394
of which, SMEs	1,544	-	-	-	-	-	-	1,544
Retail	2,997	-	-	-	-	-	-	2,997
of which, SMEs	21	-	-	-	-	-	-	21
Defaulted exposures	33	-	-	-	-	-	-	33
Exposures associated with particularly high risk	-	-	-	-	-	-	-	0
Covered bonds	35,444	1,901	-	1,299	-	51	-	38,695
Equity exposures	2,786	-	-	-	-	-	-	2,786
Otheritems	3,681	-	-	-	-	-	-	3,681
Total, Standardised Approach	78,778	3,405	2,276	1,778	132	1,400	972	88,740
IRB Approach								
Corporates	22,356	-	-	-	-	-	-	22,356
of which, SMEs	22,339	-	-	-	-	-	-	22,339
Retail	320,666	-	-	-	-	-	-	320,666
of which, SMEs	39,799	-	-	-	-	-	-	39,799
of which, secured by immovable property	289,665	-	-	-	-	-	-	289,665
of which, other exposures	31,001	-	-	-	-	-	-	31,001
Total, IRB Approach	343,022	-	-	-	-	-	-	343,022
Total	421,799	3,405	2,276	1,778	132	1,400	972	431,761

31 Dec 2019, SEK M	Sweden	Denmark	Finland	Norway	Switzerland	Germany	Total
Standardised Approach							
Central governments and central banks	19,346	-	190	-	-	1,700	21,237
Regional governments or local authorities	4,274	170	313	-	-	-	4,757
Multilateral development banks	2,339	-	-	-	-	-	2,339
Institutions	2,059	1,743	2,071	539	243	-	6,655
Corporates	2,531	-	-	-	-	-	2,531
of which, SMEs	1,634	-	-	-	-	-	1,634
Retail	2,817	-	-	-	-	-	2,817
of which, SMEs	11	-	-	-	-	-	2
Defaulted exposures	25	-	-	-	-	-	25
Exposures associated with particularly high risk	-	-	-	-	-	-	_
Covered bonds	30,758	4,739	853	-	-	-	36,350
Equity exposures	2,542	-	-	-	-	-	2,542
Other items	3,271	-	-	-	-	-	3,271
Total, Standardised Approach	69,962	6,652	3,427	539	243	1,700	82,524
IRB Approach							
Corporates	20,271	-	-	-	-	-	20,271
of which, SMEs	20,262	-	-	-	-	-	20,262
Retail	297,194	-	-	-	-	-	297,194
of which, SMEs	24,129	-	-	-	-	-	24,129
of which, secured by immovable property	267,213	-	-	-	-	-	267,213
of which, other exposures	29,980	-	-	-	-	-	29,980
Total, IRB Approach	317,465	-	-	-	-	-	317,465
Total	387,427	6,652	3,427	539	243	1,700	399,989

All IRB exposure is found in Sweden and Table 5.4 presents the exposure per county. Exposure is well-diversified throughout Sweden with a slight concentration to the metropolitan areas, specifi-

cally the counties of Stockholm, Skåne and Västra Götaland. Exposures secured by immovable property amounted to SEK 309.8 billion of a total of SEK 343.0 billion at 31 December 2020.

Table 5.4 Distribution of exposure per county, IRB

SEKM		31 Dec	2020			31 Dec 2	2019	
		Total	secure	ch, exposures d by immovable property		Total	secured	ch, exposures by immovable roperty
County	EAD	%	EAD	%	EAD	%	EAD	%
Blekinge	7,270	2.1	6,559	2.1	6,479	2.0	5,787	2.0
Dalarna	14,238	4.2	12,793	4.1	13,292	4.2	11,811	4.2
Gotland	6,172	1.8	5,683	1.8	5,979	1.9	5,470	1.9
Gävleborg	8,427	2.5	7,488	2.4	7,997	2.5	7,031	2.5
Halland	16,006	4.7	14,810	4.8	14,600	4.6	13,387	4.7
Jämtland	6,626	1.9	6,017	1.9	6,314	2.0	5,669	2.0
Jönköping	15,399	4.5	14,241	4.6	14,168	4.5	13,023	4.6
Kalmar	9,441	2.8	8,490	2.7	8,640	2.7	7,604	2.7
Kronoberg	6,543	1.9	5,865	1.9	6,004	1.9	5,327	1.9
Norrbotten	4,485	1.3	3,708	1.2	4,209	1.3	3,457	1.2
Skåne	46,471	13.5	41,616	13.4	41,276	13.0	36,611	12.9
Stockholm	43,907	12.8	38,104	12.3	43,672	13.8	38,197	13.4
Södermanland	9,313	2.7	8,318	2.7	8,578	2.7	7,576	2.7
Uppsala	16,577	4.8	15,388	5.0	15,106	4.8	13,901	4.9
Värmland	6,713	2.0	5,876	1.9	5,933	1.9	5,127	1.8
Västerbotten	12,235	3.6	11,362	3.7	11,150	3.5	10,335	3.6
Västernorrland	5,553	1.6	4,696	1.5	5,081	1.6	4,234	1.5
Västmanland	10,835	3.2	9,917	3.2	10,370	3.3	9,427	3.3
Västra Götaland	59,920	17.5	55,141	17.8	54,414	17.1	49,686	17.5
Örebro	12,888	3.8	11,585	3.7	11,936	3.8	10,562	3.7
Östergötland	24,002	7.0	22,132	7.1	22,265	7.0	20,172	7.1
Total	343,022	100.0	309,789	100.0	317,465	100.0	284,394	100.0

The Consolidated Situation applies external credit rating for exposures to institutions and exposures in the form of covered bonds. The external rating used is the rating from Moody's or Standard  $\boldsymbol{\delta}$ 

Poor's that gives rise to the highest risk weight. Table 5.5 shows exposure before and after credit-risk-reducing measures by credit quality step.

Table 5.5 Exposure by credit quality step

SEKM	31 Dec	2020	31 Dec 2019		
Credit quality step	Original exposure	EAD	Original exposure	EAD	
1	53,640	43,486	46,966	40,670	
2	4,430	1,694	6,386	2,333	
3	-	-	67	2	
4	-	-	-	-	
5	-	-	-	-	
6	-	-	-	-	
Total	58,069	45,180	53,418	43,005	

Figure 5.1 and Table 5.6 present the credit risk exposure, calculated according to IRB, specified according to risk grades. The results show a distribution of exposure, with 79% (78) of exposure found in the best grades 1–4. A contributing reason for the higher amount in

these grades is that a high percentage of lending takes place in the form of mortgages to private individuals, for which the probability of default is significantly lower than in other portfolios.

Figure 5.1 Exposure by risk class, IRB

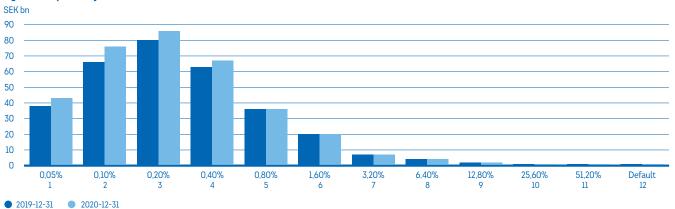


Table 5.6 Exposure by PD grade and class, IRB

SEKM			Exposures to c	orporates	Tota	l				
	Secure immovable		Other exp	osures	Tota	ıl				
PD grade, 31 Dec 2020	EAD	RW (%)	EAD	RW (%)	EAD	RW (%)	EAD	RW (%)	EAD	RW (%)
1	40,594	1	700	7	41,294	1	1,541	10	42,835	2
2	72,203	2	2,877	12	75,080	3	1,193	15	76,272	3
3	80,348	5	3,464	20	83,813	5	2,307	23	86,120	6
4	54,256	8	3,971	22	58,227	9	8,600	32	66,827	12
5	25,442	13	6,244	34	31,686	17	4,575	44	36,262	21
6	11,165	22	6,157	44	17,322	30	2,306	55	19,628	33
7	2,518	31	3,298	54	5,816	44	875	69	6,691	47
8	1,467	45	2,030	59	3,497	53	382	82	3,879	56
9	718	61	1,039	63	1,758	62	199	106	1,957	67
10	444	69	324	101	769	83	73	129	842	87
11	271	60	247	101	518	80	171	124	689	91
Default	237	110	650	73	887	83	132	0	1,019	72
Total	289,665	7	31,001	37	320,666	9	22,356	37	343,022	11

SEKM			Retail expos	Exposures to co	rporates	Total				
_ PD grade, 31 Dec 2019	Secured by immovable property		Other expo	osures	Total	ı				
	EAD	RW (%)	EAD	RW (%)	EAD	RW (%)	EAD	RW (%)	EAD	RW (%)
1	35,791	1	684	7	36,476	1	1,431	12	37,906	2
2	62,337	2	2,730	12	65,066	3	1,278	18	66,345	3
3	74,835	5	3,213	21	78,048	5	1,779	26	79,827	6
4	52,161	8	2,360	28	54,521	9	8,094	37	62,615	13
5	25,058	13	7,101	32	32,159	17	3,874	50	36,032	21
6	11,180	23	6,246	46	17,426	31	2,120	64	19,546	35
7	2,579	30	3,877	58	6,457	47	899	81	7,356	51
8	1,585	46	1,628	61	3,213	53	293	97	3,506	57
9	818	62	924	65	1,742	64	140	133	1,882	69
10	361	68	495	92	855	82	82	136	937	87
11	334	62	259	99	592	78	127	148	720	91
Default	175	115	464	76	639	87	154	0	792	70
Total	267,213	7	29,980	39	297,194	10	20,271	43	317,465	12

Table 5.7 provides general statistics of parameters such as EAD average PD and average LGD, specified per PD interval, used in the capital requirement calculations for exposures for which the IRB

Approach is applied. The tables are also specified by Advanced IRB (AIRB) and Foundation IRB (FIRB) Approach.

Table 5.7 Credit risk exposure specified by IRB Approach and PD interval

AIRB - 31 Dec 2020,	SEKM										
PD interval	Original exposure	Off- balance	Average CF	EAD	PD grade	No. of coun- terparties	Average LGD	REA	Risk weight	EL	Amount adjustment and impairment
0.00% < 0.07%	41,810	2,098	75%	41,294	0.05%	43,499	8.4%	506	1%	2	0
0.07% < 0.13%	76,216	3,687	69%	75,080	0.10%	73,409	11.3%	2,136	3%	9	-1
0.13% < 0.27%	85,506	5,493	69%	83,813	0.20%	83,483	12.7%	4,503	5%	21	-3
0.27% < 0.53%	59,430	4,347	72%	58,227	0.40%	65,306	13.8%	5,209	9%	32	-6
0.53% < 1.07%	32,205	2,244	77%	31,686	0.80%	57,448	17.4%	5,498	17%	44	-14
1.07% < 2.13%	17,561	1,391	83%	17,322	1.60%	45,810	22.0%	5,214	30%	61	-44
2.13% < 4.27%	5,935	720	83%	5,816	3.20%	24,021	28.4%	2,552	44%	53	-55
4.27% < 8.53%	3,548	349	85%	3,497	6.40%	14,753	29.5%	1,856	53%	66	-68
8.53% < 17.07%	1,775	87	80%	1,758	12.80%	6,298	28.0%	1,093	62%	63	-60
17.07% < 34.13%	771	13	83%	769	25.60%	2,958	25.7%	637	83%	51	-34
34.13% < 100.00	520	15	82%	518	51.20%	1,914	27.3%	413	80%	72	-32
100% (Default)	890	9	71%	887	100.00%	5,186	33.9%	735	83%	470	-355
Total	326,168	20,451	73%	320,666	0.94%	424,085	13.6%	30,352	9%	944	-671

#### AIRB - 31 Dec 2019, SEK M

PD interval	Original exposure	Off- balance	Average CF	EAD	PD grade	No. of coun- terparties	Average LGD	REA	Risk weight	EL	Amount adjustment and impairment
0.00% < 0.07%	36,945	1,992	76%	36,476	0.05%	39,963	8.4%	447	1%	2	0
0.07% < 0.13%	65,929	3,039	72%	65,066	0.10%	69,121	11.5%	1,874	3%	7	-1
0.13% < 0.27%	79,420	4,543	70%	78,048	0.20%	81,475	12.7%	4,189	5%	20	-2
0.27% < 0.53%	55,415	3,459	74%	54,521	0.40%	61,468	13.5%	4,849	9%	29	-2
0.53% < 1.07%	32,582	2,182	81%	32,159	0.80%	60,769	17.6%	5,600	17%	45	-10
1.07% < 2.13%	17,645	1,285	83%	17,426	1.60%	45,855	22.6%	5,410	31%	63	-23
2.13% < 4.27%	6,574	747	84%	6,457	3.20%	29,481	31.6%	3,037	47%	65	-45
4.27% < 8.53%	3,237	150	85%	3,213	6.40%	11,957	27.7%	1,713	53%	57	-39
8.53% < 17.07%	1,752	54	82%	1,742	12.80%	5,423	26.7%	1,111	64%	60	-33
17.07% < 34.13%	859	22	82%	855	25.60%	3,638	29.2%	700	82%	64	-29
34.13% < 100.00	594	7	68%	592	51.20%	2,080	25.7%	465	79%	78	-25
100% (Default)	639	3	79%	639	100.00%	4,362	38.5%	556	87%	351	-281
Total	301,591	17,483	75%	297,194	0.94%	415,592	13.9%	29,951	10%	841	-490

Table 5.7 Credit risk exposure specified by IRB Approach and PD interval, cont.

FIRB - 31 Dec 2020,	SEKM											
PD interval	Original exposure	Off- balance	Average CF	EAD	PD grade	No. of coun- terparties	Average LGD	Average term	REA	Risk weight	EL	Amount adjustment and impairment
0.00% < 0.07%	1,559	98	82%	1,541	0.05%	134	35.7%	900	155	10%	0	0
0.07% < 0.13%	1,206	63	78%	1,193	0.10%	170	35.9%	900	180	15%	0	0
0.13% < 0.27%	2,328	82	75%	2,307	0.20%	266	35.7%	900	520	23%	2	0
0.27% < 0.53%	8,660	244	76%	8,600	0.40%	1516	35.8%	900	2,772	32%	12	-1
0.53% < 1.07%	4,651	304	75%	4,575	0.80%	862	35.8%	900	2,006	44%	13	-1
1.07% < 2.13%	2,328	89	76%	2,306	1.60%	484	36.1%	900	1,267	55%	13	-1
2.13% < 4.27%	888	122	89%	875	3.20%	169	37.3%	900	603	69%	10	-1
4.27% < 8.53%	387	21	76%	382	6.40%	66	36.4%	900	312	82%	9	-1
8.53% < 17.07%	201	6	75%	199	12.80%	33	36.3%	900	211	106%	9	-1
17.07% < 34.13%	74	1	75%	73	25.60%	11	36.1%	900	95	129%	7	0
34.13% < 100.00	172	3	75%	171	51.20%	15	36.6%	900	212	124%	32	-2
100% (Default)	132	1	75%	132	100.00%	14	38.8%	900	0	0%	51	-5
Total	22,585	1,034	78%	22,356	1.93%	3,740	35.9%	900	8,334	37%	160	-15

FIRB - 31 Dec 2019, SEK M

PD interval	Original exposure	Off- balance	Average CF	EAD	PD grade	No. of coun- terparties	Average LGD	Average term	REA	Risk weight	EL	Amount adjustment and impairment
0.00% < 0.07%	1,443	67	82%	1,431	0.05%	116	35.7%	900	174	12%	0	0
0.07% < 0.13%	1,297	79	77%	1,278	0.10%	163	35.9%	900	230	18%	0	0
0.13% < 0.27%	1,792	52	76%	1,779	0.20%	245	35.7%	900	464	26%	1	0
0.27% < 0.53%	8,161	277	76%	8,094	0.40%	1396	36.3%	900	3,017	37%	12	0
0.53% < 1.07%	3,915	168	75%	3,874	0.80%	786	36.8%	900	1,940	50%	11	0
1.07% < 2.13%	2,140	82	75%	2,120	1.60%	407	37.0%	900	1,362	64%	13	-1
2.13% < 4.27%	909	65	86%	899	3.20%	158	37.9%	900	733	81%	11	-1
4.27% < 8.53%	295	9	75%	293	6.40%	53	37.3%	900	283	97%	7	-1
8.53% < 17.07%	141	1	75%	140	12.80%	23	38.4%	900	186	133%	7	0
17.07% < 34.13%	82	0	75%	82	25.60%	16	35.9%	900	111	136%	8	0
34.13% < 100.00	128	1	75%	127	51.20%	15	37.1%	900	189	148%	24	-1
100% (Default)	154	1	75%	154	100.00%	15	37.1%	900	0	0%	57	-6
Total	20,456	802	77%	20,271	2.01%	3,393	36.4%	900	8,689	43%	151	-11

A correlation between the internal grades for IRB exposures and external rating that is considered a reasonable comparison is presented in Table 5.8 below.

Table 5.8 Correlation between internal PD grades and external rating (Standard  $\vartheta$  Poor's)

Internal	PD (%)	Indicative rating from S&P
1-4	< 0.53	AAA till BB+
5-6	0.53-2.13	BB till B+
7-8	2.13-8.53	В
9-11	>8.53	B- to C
Default	100	D

Table 5.9 shows the exposure-weighted, average PD, LGD and CF (excluding defaulted exposures) for IRB Approach exposures.

Table 5.9 Exposure-weighted PD, LGD and CF, IRB

2020-12-31	PD	LGD	CF
IRB Approach			
Corporates	1.34%	35.9%	75.0%
of which, SMEs	1.34%	35.9%	75.0%
Retail	0.66%	13.6%	62.8%
of which, secured by immovable property	0.47%	10.8%	47.7%
of which, other retail credits	2.47%	40.7%	86.0%
of which, SMEs	1.46%	17.9%	83.8%
Total, IRB Approach 2020	0.71%	15.0%	63.5%
Total, IRB Approach 2019	0.76%	15.3%	65.6%

#### **Expected loss and actual outcome**

The Expected Loss (EL) is expressed as a percentage of the exposure and calculated based on the internal estimates of PD and LGD. Table 5.10 below shows the estimated expected loss on 31 December 2018 for all non-defaulted retail exposures compared with actual outcome (confirmed loss) for default occurring in 2019 with a follow-up period until 31 December 2020. One of the reasons that EL is higher than the actual outcome is that the estimate for PD is significantly higher than the observed default percentage.

Table 5.10 Expected loss and actual outcome

Exposure class	EL%	Actual outcome, %
Retail	0.17	0.09
of which, secured by immovable property	0.06	0.00
of which, other	1.111	0.94

#### 5.3.1 Risk-reducing measures and contractual maturities

The starting point of the credit assessment is always the customer's repayment capacity, with the approach that collateral received can never compensate for a low repayment capacity. However, collateral received can significantly counteract the losses in the event of a credit default. Loans are mostly granted against collateral in property, for which the operation has extensive experience

and robust procedures in place. The market value of properties is updated on an annual basis, or when necessary, following established procedures. The relationship between the loan portfolio and the underlying assets expressed as the exposure-weighted average loan-to-value (LTV) ratio was 60% (61). Table 5.11 shows mortgages specified by per loan-to-value ratio interval (LTV).

Table 5.11 Retail mortgages by loan-to-value ratio interval (LTV)

EAD, SEK M	31 Dec 2020	%	31 Dec 2019	%
0-50%	209,130	80	192,558	80
51-60%	24,857	10	23,321	10
61-70%	16,142	6	15,527	6
71-75%	4,617	2	4,551	2
75%-	4,694	2	4,687	2
Total	259,439	100	240,645	100

Other significant risk-reducing measures in the Consolidated Situation are the netting agreements signed with institutional counterparties.

Table 5.12 presents exposure amounts covered by eligible collateral. Collateral for exposures to institutions comprises financial collateral, while collateral for the corporate and retail exposure classes comprises immovable property for which the covered amount totalled SEK 309.5 billion on 31 December 2020.

Table 5.12 Eligible collateral for capital adequacy purposes

	31 Dec 202	0	31 Dec 20	19
SEKM	Original exposure	Exposure amount covered by collateral	Original exposure	Exposure amount covered by collateral
Standardised Approach				
Central governments and central banks	21,721	-	19,814	-
Regional governments or local authorities	176	-	192	-
Exposures to public sector entities	1,153	-	1,593	-
Multilateral development banks	3,641	-	2,339	-
Institutions	19,374	7,955	17,068	6,009
Corporates	2,447	-	2,554	-
of which, SMEs	1,565	-	1,645	-
Retail	4,787	-	4,433	-
of which, SMEs	22	-	11	-
Defaulted exposures	80	-	60	-
Covered bonds	38,695	-	36,350	-
Exposures associated with particularly high risk	0	_	0	_
Equity exposures	2,786	-	2,542	-
Otheritems	3,681	-	3,271	-
Total, Standardised Approach	98,541	7,955	90,216	6,009
IRB Approach				
Corporates	22,585	20,300	20,456	17,349
of which, SMEs	22,564	20,300	20,444	17,349
Retail	326,168	289,184	301,591	267,041
of which, SMEs	40,297	25,502	24,151	24,092
Total, IRB Approach	348,753	309,484	322,047	284,390
Total	447,294	317,439	412,263	290,399

 ${\it Table 5.13 presents exposures distributed by exposure class and remaining fixed-interest periods.}$ 

Table 5.13 Exposures (EAD) by fixed-interest periods

31 Dec 2020, SEK M	<3 months	3-12 months	1-5 years	>5 years	Total
Standardised Approach					
Central governments and central banks	15,227	102	4,367	3,116	22,812
Regional governments or local authorities	279	698	2,725	1,513	5,214
Exposures to public sector entities	0	0	0	0	0
Multilateral development banks	237	352	2,361	691	3,641
Institutions	965	5,519	0	0	6,485
Covered bonds	5,720	9,615	9,388	13,973	38,695
Corporates	2,375	4	27	0	2,406
Retail	3,019	0	0	0	3,019
Equities	2,786	0	0	0	2,786
Other items	3,681	0	0	0	3,681
Total, Standardised Approach	34,289	16,291	18,867	19,293	88,740
IRB Approach					
Corporates	14,627	1,394	5,845	490	22,356
Retail	176,077	27,664	114,651	2,275	320,666
of which, secured by immovable property	145,318	27,623	114,486	2,239	289,665
of which, other exposures	30,759	41	165	36	31,001
Total, IRB Approach	190,703	29,057	120,496	2,765	343,022
Total	224,992	45,348	139,363	22,058	431,761

31 Dec 2019, SEK M	<3 months	3-12 months	1-5 years	>5 years	Total
Standardised Approach					
Central governments and central banks	13,990	1,709	5,050	487	21,237
Regional governments or local authorities	950	966	2,275	567	4,757
Exposures to public sector entities	0	0	0	0	0
Multilateral development banks	162	210	1,368	598	2,339
Institutions	6,655	0	0	0	6,655
Covered bonds	4,641	11,746	15,844	4,119	36,350
Corporates	2,437	70	32	0	2,539
Retail	2,834	0	0	0	2,834
Equities	2,542	0	0	0	2,542
Other items	3,271	0	0	0	3,271
Total, Standardised Approach	37,480	14,702	24,570	5,771	82,524
IRB Approach					
Corporates	14,236	1,335	4,336	364	20,271
Retail	190,172	16,478	88,218	2,326	297,194
of which, secured by immovable property	160,510	16,358	88,099	2,246	267,213
of which, other exposures	29,662	120	119	79	29,980
Total, IRB Approach	204,408	17,813	92,554	2,689	317,465
Total	241,888	32,515	117,125	8,461	399,989

### 5.4 NON-PERFORMING RECEIVABLES, CREDIT LOSSES AND LOSS ALLOWANCE

This section describes the Bank Group's non-performing receivables, credit losses, and reserves for credit losses ("loss allowance") that are based in their entirety on the total loan portfolio from an accounting perspective.

#### 5.4.1 Non-performing receivables

A loan receivable is considered non-performing if it has an outstanding payment that is more than nine days past due and is not creditimpaired. Table 5.14 presents non-performing receivables that are not credit-impaired by exposure class and segment, while Table 5.15 presents non-performing receivables that are not credit-impaired by company.

Table 5.14 Non-performing loan receivables by exposure class and segment

31 Dec 2020, SEK M	Segment	Receivables 10-30 days past due	Receivables 31-60 days past due	Receivables 61-90 days past due	Receivables >90 days past due	Total
Standardised Approach	Private individuals	0.1	19.0	5.6	1.7	26.4
	Agriculture	0.0	2.2	0.0	0.0	2.2
	Other corporates	1.6	2.1	0.3	0.3	4.3
Total, Standardised Approa	ach	1.7	23.4	5.9	2.0	33.0
IRB Approach						
of which, Retail	Private individuals	0.4	127.5	40.1	25.4	193.4
	Agriculture	0.2	15.0	1.4	0.0	16.5
	Other corporates	17.5	113.4	16.7	1.1	148.7
Total Retail		18.1	255.9	58.2	26.4	358.7
of which, Corporates	Agriculture	0.0	0.0	0.0	0.0	0.0
	Other corporates	0.0	14.8	0.0	0.0	14.8
Total Corporates		0.0	14.8	0.0	0.0	14.8
Total, IRB Approach		18.1	270.7	58.2	26.4	373.5
Total		19.8	294.1	64.1	28.5	406.5

31 Dec 2019, SEK M	Segment	Receivables 10-30 days past due	Receivables 31-60 days past due	Receivables 61-90 days past due	Receivables >90 days past due	Total
Standardised Approach	Private individuals	0.3	22.6	8.8	31.7	31.7
	Agriculture	0.0	2.7	0.0	2.7	2.7
	Other corporates	6.2	26.0	0.2	32.4	32.4
Total, Standardised Approx	ach	6.6	51.3	9.0	66.9	66.9
IRB Approach						
of which, Retail	Private individuals	1.0	184.6	36.0	221.6	221.6
	Agriculture	0.3	13.0	6.7	20.0	20.0
	Other corporates	28.4	208.6	25.1	262.1	262.1
Total Retail		29.7	406.2	67.8	503.8	503.8
of which, Corporates	Agriculture	0.0	0.0	0.0	0.0	0.0
	Other corporates	0.0	0.1	0.0	0.1	0.1
Total Corporates		0.0	0.1	0.0	0.1	0.1
Total, IRB Approach		29.7	406.3	67.8	503.8	503.8
Total		36.3	457.6	76.8	570.7	570.7

Table 5.15 Non-performing loan receivables that are not credit-impaired, by company

31 Dec 2020, SEK M	Länsförsäkringar Bank AB	Länsförsäkringar Hypotek AB	Wasa Kredit AB	Total
Receivables 1-30 days past due	0.0	0.0	19.8	19.8
Receivables 31-60 days past due	21.4	44.8	227.9	294.1
Receivables 61-90 past due	3.5	14.7	45.9	64.1
Receivables >90 days past due	1.6	19.1	7.8	28.5
Total	26.5	78.6	301.4	406.5

31 Dec 2019, SEK M	Länsförsäkringar Bank AB	Länsförsäkringar Hypotek AB	Wasa Kredit AB	Total
Receivables 10-30 days past due	0.0	0.0	36.3	36.3
Receivables 31-60 days past due	20.9	61.1	375.6	457.6
Receivables 61-90 days past due	0.0	0.0	76.8	76.8
Total	20.9	61.1	488.7	570.7

#### 5.4.2 Credit losses

Credit losses comprise expected credit losses, confirmed credit losses, recoveries of credit losses previously recognised as confirmed and reversals of expected credit losses no longer required. Confirmed credit losses could refer to the entire receivable or parts of it when there is no realistic possibility of recovery. A confirmed credit loss is recognised as a write-off of the gross carrying amount and an add-back of the portion of the allowance for expected credit losses that pertains to a written-off loan or portions of a loan. Recoveries comprise payments of loans that were previously recognised as confirmed credit losses. Expected credit losses are reversed when no impairment requirement is deemed to exist.

A condition for full payment of the regional insurance companies' distribution remuneration by the Bank Group is that the loans generated by each company for the Bank Group (excluding Wasa Kredit) are of high quality. If this is not the case, up to 80% of any

credit losses are off-set against the accrued remuneration to the regional insurance companies. This settlement account is kept separate and is taken into consideration when the provisions are established. On 31 December 2020, the total loss allowance requirement for loans to the public and commitments and guarantees amounted to SEK 967 M (699), of which the Bank Group's recognised loss allowance accounted for SEK 824 M (591) and the remainder of SEK 143 M (108) was settled against the regional insurance companies' withheld funds, according to the model described above.

Table 5.16 presents the credit losses in the Bank Group, which remained low and were mostly attributable to Wasa Kredit. Credit losses amounted to SEK 325 M (207), net, on 31 December 2020, corresponding to a credit loss level of 0.09% (0.06). Credit-impaired loan receivables and credit losses continued to account for a minor percentage of total loans.

Table 5.16 Credit losses

SEK M	31 Dec 2020	31 Dec 2019
Change in loss allowance for loan receivables		
Stage I (not credit-impaired)	76.1	24.0
Stage 2 (not credit-impaired)	54.0	39.2
Stage 3 (credit-impaired)	82.9	80.0
Total change in loss allowance for loan receivables	213.0	143.3
Expense for confirmed credit losses	192.7	146.0
Recoveries	-105.5	-90.5
Net expense for credit losses for loan receivables	300.2	198.7
Change in loss allowance for commitments and guarantees	20.6	5.5
Net expense for other credit losses	4.3	2.6
Net expense of modification result	0.4	0.3
Net expense for credit losses for the year	325.5	207.2

Table 5.17 presents the opening balance of the loss allowance at the beginning of the year attributable to loans to the public as well as changes during the year.

Table 5.17 Change in loss allowance

Reconciliation of loss allowance	Not credit-impaired	Credit-impaired	
Loans to the public, SEK M	Stage 1 & 2	Stage 3	Total loss allowance
Opening balance, 1 January 2020	246.5	322.1	568.6
New or acquired loans	106.7	0.6	107.4
Change in loss allowance model or method	-10.1	-6.3	-16.4
Repayment	-88.7	-56.8	-145.4
Change in risk parameters	274.3	92.7	367.0
Revaluation due to changed credit risk	-149.7	255.8	106.1
Other adjustments	-2.4	-1.0	-3.4
Write-offs	0.0	-202.2	-202.2
Closing balance, 31 December 2018	376.6	405.0	781.7

Reconciliation of loss allowance	Not credit-impaired	<b>Credit-impaired</b>	
Loans to the public, SEK M	Stage 1 & 2	Stage 3	Total loss allowance
Opening balance, 1 January 2019	183.3	242.1	425.4
New or acquired loans	67.2	0.5	67.7
Change in loss allowance model or method	0.0	0.2	0.2
Repayment	-69.9	-42.0	-111.9
Change in risk parameters	174.6	69.9	244.5
Revaluation due to changed credit risk	-104.9	199.5	94.6
Other adjustments	-3.8	-2.6	-6.4
Write-offs	0.0	-145.5	-145.5
Closing balance, 31 December 2019	246.5	322.1	568.6

 ${\it Table 5.18 presents the loss allowance for loan receivables, commitments and guarantees, by segment.}$ 

 ${\it Table 5.18 Loss allowance for loan receivables, commitments and guarantees, by industry}$ 

			Not credit-impaired	Credit-impaired	Total
31 Dec 2020, SEK M		Stage 1	Stage 2	Stage 3	
Standardised Approach	Segment	Loss allowance	Loss allowance	Loss allowance	Loss allowance
	Private individuals	10.1	18.8	35.6	64.6
	Agriculture	0.0	0.0	0.0	0.0
	Other corporates	33.9	28.8	10.6	73.3
Total, Standardised Appro	ach	44.0	47.7	46.2	137.9
IRB Approach					
of which, Retail	Private individuals	58.2	57.2	225.0	340.5
	Agriculture	3.9	2.2	2.1	8.2
	Other corporates	87.6	107.4	127.8	322.8
Total Retail		149.7	166.9	354.9	671.4
of which, Corporates	Private individuals	0.3	0.2	0.0	0.5
	Agriculture	1.9	3.3	4.2	9.4
	Other corporates	3.3	0.6	1.2	5.1
Total Corporates		5.6	4.1	5.4	15.0
Total, IRB Approach		155.3	170.9	360.3	686.5
Total		199.3	218.6	406.5	824.4

			Not credit-impaired	Credit-impaired	Total
31 Dec 2019, SEK M	_	Stage 1	Stage 2	Stage 3	
Standardised Approach	Segment	Loss allowance	Loss allowance	Loss allowance	Loss allowance
	Private individuals	7.5	17.9	27.2	52.6
	Agriculture	0.0	0.0	0.0	0.0
	Other corporates	13.6	15.7	8.1	37.4
Total, Standardised Approa	ich	21.1	33.6	35.3	90.0
IRB Approach					
of which, Retail	Private individuals	47.4	56.8	177.1	281.3
	Agriculture	1.5	2.1	1.9	5.5
	Other corporates	33.8	66.8	102.5	203.1
Total Retail		82.7	125.7	281.5	489.9
of which, Corporates	Private individuals	0.1	0.1	0.0	0.2
	Agriculture	0.8	2.8	5.3	8.8
	Other corporates	0.9	0.4	0.4	1.8
Total Corporates		1.8	3.3	5.7	10.8
Total, IRB Approach		84.5	129.0	287.2	500.7
Total		105.7	162.5	322.5	590.7

### 5.5 CREDIT QUALITY OF NON-PERFORMING EXPOSURES AND FORBORNE EXPOSURES

This section describes the Consolidated Situation's credit quality for performing and non-performing exposures as well as forborne exposures. As Table 5.19 shows, forborne exposures increased 227% during the year. Forborne exposures in 31 December 2020 amounted to SEK 2,449 M (748). The increase was primarily due to performing forborne exposures resulting from COVID-19. Non-performing exposures increased 24% during the year, refer to

Table 5.20 and Table 5.21. Non-performing exposures on 31 December 2020 amounted to SEK 1,369 M (1,107). The share of non-performing loans amounted to 0.40% (0.35). The increase in non-performing exposures was mainly attributable to the volume of defaulted exposures increasing 29% to SEK 1,102 M (853) during the year. The increase in defaulted volumes also led to an increase in stage 3 exposures and loss allowance for these exposures. Stage 3 exposures amounted to SEK 1,173 M (942).

Accumulated impairment, accumula-

Collateral received and

Table 5.19 Credit quality of forborne exposures

	nominal amoun	Gross carrying at of exposures wi	amount/ th forbearance me	asures	ted negative changes in fair value due financial guarante			al received and rantees received on ne exposures
31 Dec 2020		Non-pe	rforming forborne	1	On	On non-		of which: Collateral and financial gua- rantees received on non-performing
	Performing forborne	Total	of which: Defaulted	of which: impaired	performing forborne exposures	performing forborne exposures	Total	exposures with forbearance measures
Loans and advances	2,268.0	181.3	145.5	168.6	-17.1	-31.9	2,199.4	113.3
Central banks	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
General governments	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Credit institutions	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other financial corporations	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Non-financial corporations	454.9	101.5	99.3	100.2	-17.1	-26.1	359.8	42.4
Households	1,812.3	79.9	46.2	68.4	0.0	-5.8	1,839.5	70.9
Debt securities	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Loan commitments given	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	2,268.0	181.3	145.5	168.6	-17.1	-31.9	2,199.4	113.3

	sures	ted negative changes to credit risk and	in fair value due	financial guarantees received on forborne exposures				
		Non-performing forborne			On performing	On non- performing		
31 Dec 2019	Performing forborne	Total	of which: Defaulted	of which: impaired	forborne	forborne exposures		forbearance measures
Loans and advances	638.9	108.8	58.7	80.0	-7.9	-5.2	593.3	94.0
Central banks	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
General governments	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Credit institutions	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other financial corporations	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Non-financial corporations	194.8	22.7	17.7	17.7	-5.4	-2.6	98.8	14.4
Households	444.1	86.1	41.0	62.3	-2.5	-2.7	494.5	79.6
Debt securities	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Loan commitments given	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	638.9	108.8	58.7	80.0	-7.9	-5.2	593.3	94.0

Table 5.20 Credit quality of performing and non-performing exposures by past due days

					Gross ca	rrying amou	nt/nominal a	amount				
	Perf	orming expos	ures				Non-pe	rforming ex	osures			
31 Dec 2020, SEK M	Total	Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days	Total	Unlikely to pay that are not past due or are past due ≤ 90 days	Past due >90 days ≤180 days	Past due >180 days ≤1 year	Past due >1 year ≤ 2 years	Past due >2 year ≤ 5 years	Past due >5 year ≤ 7 years	Past due >7 years	Of which: defaulted
Loans and advances	341,613.2	341,251.8	361.4	1,353.2	833.7	160.3	190.3	165.1	3.8	0.0	0.0	1,090.4
Central banks	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
General governments	9,963.9	9,963.6	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Credit institutions	2,305.4	2,305.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other financial corporations	69.2	68.7	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Non-financial corporations	19,728.1	19,610.0	118.1	296.7	177.2	31.9	47.6	38.8	1.3	0.0	0.0	285.6
of which: SMEs	18,975.5	18,859.1	116.4	291.6	173.7	31.6	46.3	38.8	1.3	0.0	0.0	280.5
Retail	309,546.7	309,304.1	242.5	1,056.5	656.5	128.4	142.8	126.3	2.5	0.0	0.0	804.8
Debt securities	61,544.5	61,544.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Central banks	4,909.2	4,909.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
General governments	6,886.7	6,886.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Credit institutions	48,656.9	48,656.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other financial corporations	1,091.7	1,091.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Non-financial corporations	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Off-balance-sheet exposures	25,291.7			16.0								11.4
Central banks	0.0			0.0								0.0
General governments	28.7			0.0								0.0
Credit institutions	0.2			0.0								0.0
Other financial corporations	80.4			0.0								0.0
Non-financial corporations	2,826.1			9.2								6.8
Retail	22,356.2			6.8								4.6
Total	428,449.5	402,796.3	361.4	1,369.2	833.7	160.3	190.3	165.1	3.8	0.0	0.0	1,101.8

 ${\it Table 5.20 Credit quality of performing and non-performing exposures by past due days, cont.}$ 

Gross carrying amount/nominal amount

			Gross carrying amount/nominal amount									
	Perfo	rming exposi	ures		Non-performing exposures							
31 Dec 2019, SEK M	N Total	lot past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due >180 days ≤1year	Past due >1 year ≤ 2 years	Past due >2 year ≤ 5 years	Past due >5 year ≤ 7 years	Past due >7 years	Of which:
Loans and advances	317,068.3	316,536.3	532.1	1,101.7	642.8	170.4	152.8	127.0	2.9	5.8	0.0	849.5
Central banks	9,831.1	9,831.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
General governments	159.7	159.5	0.2	2.8	2.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Credit institutions	631.6	631.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other financial corporations	69.1	68.9	0.1	0.4	0.0	0.0	0.0	0.4	0.0	0.0	0.0	0.4
Non-financial corporations	18,462.9	18,244.6	218.2	214.6	117.5	38.6	27.4	30.2	0.9	0.0	0.0	199.1
of which: SMEs	17,668.3	17,456.8	211.5	209.0	111.9	38.6	27.4	30.2	0.9	0.0	0.0	193.6
Retail	287,914.1	287,600.6	313.5	883.9	522.5	131.8	125.4	96.4	2.1	5.8	0.0	649.9
Debt securities	55,116.6	55,116.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Central banks	3,783.2	3,783.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
General governments	6,151.5	6,151.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Credit institutions	45,181.9	45,181.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other financial corporations	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Non-financial corporations	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Off-balance-sheet exposures	21,867.7			5.7								3.3
Central banks	0.0			0.0								0.0
General governments	35.2			0.0								0.0
Credit institutions	0.6			0.0								0.0
Other financial corporations	80.0			0.0								0.0
Non-financial corporations	2,559.0			2.9								2.1
Retail	19,192.9			2.8								1.2
Total	394,052.7	371,652.9	532.1	1,107.5	642.8	170.4	152.8	127.0	2.9	5.8	0.0	852.8

 Table 5.21 Performing and non-performing exposures and related provisions

			Gross carryin nominal a				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				1	Collateral rece and financial guar received			
	Perfo	Performing exposures Non-performing exposures			Performing exposures - accumulated impairment and provisions			Non-performing exposures - accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			Accumu-	On	On non-		
31 Dec 2020, SEK M	Total	of which: stage 1	of which: stage 2	Total	of which: stage 2	of which: stage 3	Total	of which: stage 1	of which: stage 2	Total	of which: stage 2	of which: stage 3	lated partial write-off	performing exposures	performing exposures
Loans and advances	341,613.2	334,095.1	7,518.2	1,353.2	104.2	1,161.0	-375.9	-167.0	-208.9	-405.8	-0.7	-405.0	-	311,384.6	782.8
Central banks	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0	0.0
General governments	9,963.9	9,910.9	53.0	0.0	0.0	0.0	-7.5	-4.5	-2.9	0.0	0.0	0.0	-	0.0	0.0
Credit institutions	2,305.4	2,304.5	0.9	0.0	0.0	0.0	-0.1	0.0	-0.1	0.0	0.0	0.0	-	0.0	0.0
Other financial corporations	69.2	47.4	21.8	0.0	0.0	0.0	-1.8	-0.7	-1.1	0.0	0.0	0.0	-	1.3	0.0
Non-financial corporations	19,728.1	17,113.7	2,614.4	296.7	4.5	287.0	-207.5	-87.6	-119.9	-124.2	-0.1	-124.1	-	12,445.6	107.4
of which: SMEs	18,975.5	16,578.0	2,397.5	291.6	4.5	281.9	-179.8	-75.7	-104.1	-120.4	-0.1	-120.3	-	12,155.4	107.4
Retail	309,546.7	304,718.6	4,828.1	1,056.5	99.7	874.1	-159.0	-74.1	-84.9	-281.6	-0.6	-281.0	-	298,937.8	675.4
<b>Debt securities</b>	61,544.5	58,619.5	0.0	0.0	0.0	0.0	-1.1	-1.1	0.0	0.0	0.0	0.0	-	0.0	0.0
Central banks	4,909.2	4,909.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0	0.0
General governments	6,886.7	6,886.7	0.0	0.0	0.0	0.0	-0.3	-0.3	0.0	0.0	0.0	0.0	-	0.0	0.0
Credit institutions	48,656.9	45,731.9	0.0	0.0	0.0	0.0	-0.8	-0.8	0.0	0.0	0.0	0.0	-	0.0	0.0
Other financial corporations	1,091.7	1,091.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0	0.0
Non-financial corporations	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0	0.0
Off-balance-sheet exposures	25,291.7	24,913.7	378.0	16.0	2.8	11.9	41.2	32.2	9.0	1.5	0.0	1.4	-	0.0	0.0
Central banks	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0	0.0
General governments	28.7	23.1	5.6	0.0	0.0	0.0	1.6	1.0	0.5	0.0	0.0	0.0	-	0.0	0.0
Credit institutions	0.2	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0	0.0
Other financial corporations	80.4	77.5	2.9	0.0	0.0	0.0	0.5	0.5	0.1	0.0	0.0	0.0	-	0.0	0.0
Non-financial corporations	2,826.1	2,707.4	118.8	9.2	1.8	7.1	23.2	19.7	3.5	0.4	0.0	0.4	-	0.0	0.0
Retail	22,356.2	22,105.5	250.7	6.8	1.1	4.8	15.9	11.1	4.9	1.1	0.0	1.1	-	0.0	0.0
Total	428,449.5	417,628.2	7,896.2	1,369.2	107.0	1,172.9	-335.8	-135.9	-199.9	-404.3	-0.7	-403.6	-	311,384.6	782.8

Table 5.21 Performing and non-performing exposures and related provisions, cont.

Collateral received Accumulated impairment, accumulated negative changes in Gross carrying amount/ and financial guarantees nominal amount fair value due to credit risk and provisions received Non-performing exposures **Performing exposures** - accumulated impairment, accumulated - accumulated impairment and Performing exposures Non-performing exposures negative changes in fair value due to provisions credit risk and provisions On On non-Accumuof which, of which, of which, of which, of which, of which of which, of which, lated partial performing performing 31 Dec 2019, SEK M Total Total stage 2 write-off stage 1 stage 2 Total stage 2 stage 3 stage 1 stage 2 Total stage 3 exposures exposures Loans and advances 317.068.3 309.208.7 7.859.6 1.101.7 70.5 938.1 -245.4 -90.7 -154.7 -323.3 -0.9 -322.1 296.265.8 668.1 Central banks 9,831.1 9,831.1 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 General governments 159.7 137.8 21.9 1.1 0.0 -4.2 -2.9 -0.2 -0.1 0.0 0.0 0.0 2.8 -1.3 Credit institutions 631.6 631.5 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 Other financial corporations 69.1 55.1 13.9 0.4 0.0 0.4 -0.5 -0.3 -0.2 -0.4 0.0 -0.4 68.3 0.0 Non-financial corporations 18,462.9 15,852.8 2,610.1 214.6 9.0 200.6 -103.5 -32.7 -70.8 -99.6 -0.3 -99.3 18,112.2 66.3 of which: SMEs 17,668.3 15.246.4 2.421.9 8.9 -92.9 -98.6 -98.3 17.419.5 65.6 209.0 195.1 -28.9 -63.9 -0.3 287.914.1 282,700,4 278,085.3 601.8 Retail 5.213.6 883.9 60.4 737.1 -137.1 -54.8 -82.3 -223.1 -0.6 -222.4 **Debt securities** 55,116.6 52,608.6 0.0 0.0 0.0 -0.9 -0.9 0.0 0.0 0.0 0.0 0.0 0.0 0.0 Central banks 3,783.2 3,783.2 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 General governments 6.151.5 6.151.5 0.0 0.0 0.0 0.0 -0.3 -0.3 0.0 0.0 0.0 0.0 0.0 Credit institutions 45.181.9 42.674.0 0.0 0.0 0.0 0.0 -0.6 0.0 0.0 0.0 0.0 -0.6 0.0 0.0 Other financial corporations 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 Non-financial corporations 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 Off-balance-sheet exposures 21,867.7 21.566.1 301.6 5.7 0.7 3.6 21.7 14.8 6.9 0.4 0.0 0.4 0.0 0.0 Central banks 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 General governments 35.2 29.5 5.7 0.0 0.0 0.0 1.3 0.7 0.5 0.0 0.0 0.0 0.0 0.0 Credit institutions 0.6 0.6 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 Other financial corporations 80.0 76.6 3.3 0.0 0.0 0.0 0.1 0.1 0.0 0.0 0.0 0.0 0.0 0.0 Non-financial corporations 2.559.0 2.465.1 94.0 2.9 0.4 2.2 9.1 6.6 2.5 0.2 0.0 0.2 0.0 0.0 Retail 19,192.9 18,994.3 198.6 2.8 0.3 1.4 11.2 7.4 3.8 0.1 0.0 0.1 0.0 0.0 Total 394.052.7 383,383,5 8.161.2 1.107.5 71.2 941.7 -224.6 -76.8 -147.8 -322.9 -0.9 -321.7 296.265.8 668.1

Table 5.22 Collateral obtained by taking possession and execution processes (only Wasa Kredit)

	31 Dec 2020		31 Dec 2019		
	Collateral obtained by taki	ing possession	Collateral obtained by taking possession		
SEK M	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	
Property, plant and equipment (PP&E)	-	-	-	-	
Other than PP&E	-	-	-	-	
Residential immovable property	-	-	-	-	
Commercial immovable property	-	-	-	-	
Movable property	8	-	15	-	
Equity and debt instruments	-	-	-	-	
Other than PP&E	-	-	-	-	
Total	8	-	15	-	

#### 5.6 COUNTERPARTY RISK FOR DERIVATIVES

Counterparty risk is the risk of a counterparty being unable to fulfil its commitments, which could lead to losses. The Board determines limits on the maximum exposure amount per counterparty. The market value method is used for calculating capital requirements for counterparty risk regarding derivatives. The Consolidated Situation has only swap counterparties with a high credit rating and for which ISDA agreements have been prepared. ISDA agreements allow net accounting of positive and negative derivatives, which reduces the risk to the net position per counterpart. The ISDA agreements also have associated CSA agreements. CSA agreements involve commitments concerning delivery and receipt of collateral in the event of market changes. These agreements are unilateral for

Länsförsäkringar Hypotek's covered-bond operations, with only the counterparty providing collateral. There are no CSA agreements for which the Consolidated Situation is required to provide collateral for downgrades. Table 5.23 presents the derivative exposure for the Consolidated Situation. Exposure to central counterparties is recognised without any rating. The entire exposure to central counterparties and banks on 31 December 2020 comprised exposure to Nasdaq Clearing AB. Nasdaq Clearing AB does not have any rating but is a very strong counterparty due to the strong statutory regulations that apply to Nasdaq Clearing AB and other central counterparties. Nasdaq Clearing AB has been certified by the Swedish Financial Supervisory Authority as an EMIR counterparty and is subject to the supervision of the Authority.

Table 5.23 Derivatives at fair value

SEKM			31 Dec 2020			31 Dec 2019				
Rating	Gross	Netting gain	Collateral	Net exposure	EAD	Gross	Netting gain	Collateral	Net exposure	EAD
AA-/Aa3	1,250	540	264	1,561	1,817	2,443	284	980	1,159	2,775
A+/Al	1,182	437	921	869	191	0	0	0	0	0
A/A2	0	0	0	0	0	0	0	0	0	0
a-/a3	1,536	108	1,448	197	1,443	3,543	119	3,216	177	1,741
BBB+/Baal	0	0	0	0	0	1,404	64	1,293	36	394
n/a	1,447	378	1,478	725	946	834	285	932	0	636
Total	5,414	1,464	4,111	3,352	4,397	8,224	752	6,421	1,371	5,546

### 6 | Market risk

Market risk pertains to the risk of loss arising due to changes in the market price of assets, liabilities and financial instruments.

#### **6.1 RISKAPPETITE**

The Board of Directors determines the risk appetite for market risk. The Consolidated Situation has a low appetite for market risks, meaning that these risks are to be limited to a reasonable extent. The Consolidated Situation does not have a trading book.

#### **6.2 RISK MANAGEMENT**

The aim of risk management is to reduce the immediate effect that an unexpected change in the market could have on the Consolidated Situation. Day-to-day management of market risks takes place in the Treasury unit. The management takes place in a cost-effective manner, within set limits. The Consolidated Situation applies a number of supplementary risk measures and stress tests to measure market risk.

The Consolidated Situation's primary market risk is interest-rate risk. Interest-rate risk is primarily minimised by matching fixed lending with corresponding funding. Secondly, interest-rate risk is reduced by utilising interest-rate derivatives.

#### 6.2.1 Governance

The overall framework for the financial operations is adopted by the Board in the Risk Policy. The Board also adopts the limits for interest-rate risk, spread risk and currency risk. Limits are determined by the Board of each company. The methods for calculating market risks are established by the Risk Committee.

#### 6.2.2 Interest-rate risk

Interest-rate risk is defined as the risk of losses due to changes in market interest rates.

Interest-rate risk arises in the Consolidated Situation primarily through different interest-rate fixing periods for assets and liabilities, but also in ensuring access to a large liquidity reserve and funding in foreign currency.

Interest-rate risk is calculated as the effect of a sharp momentary stress scenario. The capital requirement calculation for interest-rate risk in Pillar II uses a Value-At-Risk model.

Table 6.1 shows the changes in present value arising from a 100-basis-point shift in market interest rates, specified by currency. The analysis does not include equity that the Consolidated Situation has or the possibility of adapting to changed interest-rate levels. Interest-rate risk is almost exclusively in SEK and has changed due to natural fluctuations arising from different interest-rate fixing periods for assets and liabilities. Table 6.3 shows the interest-rate fixing period of assets, liabilities and derivatives for the Consolidated Situation. Non-interest-bearing assets and liabilities have been excluded.

Table 6.1 Interest-rate risk by currency

SEKM	31 Dec 2020	31 Dec 2019
SEK	-331.0	-51.3
CHF	0.0	0.0
EUR	3.4	4.0
NOK	0.0	-0.1
GBP	0.0	0.0
USD	0.0	0.0
Total	334.4	55.4

Net interest income risk is the risk of a negative effect on net interest income, some of the causes of which are changes in market interest rates or the company's financing costs. Table 6.2 presents the two scenarios and their impact on net interest income over the next few years.

Table 6.2 Net interest income risk

SEKM	31 Dec 2020	31 Dec 2019
Parallel shift, up 100 bp	181.1	168.2
Parallel shift, down 50 bp	-98.9	-83.8

Table 6.3 Interest-rate fixing period of assets, liabilities and derivatives - Interest-rate exposure, nominal values

31 Dec 2020, SEK M	Up to 3 months	3-12 months	1-5 years	More than 5 years	Total
Loans	201,448.9	37,314.7	102,751.6	1,322.0	342,837.1
Bonds, etc.	13,821.5	9,908.5	32,534.0	3,606.0	59,870.0
Total	215,270.4	47,223.2	135,285.5	4,928.0	402,707.1
Deposits	142,040.0	804.4	580.0	0.0	143,424.5
Debt securities in issue, etc.	36,125.8	18,248.7	144,971.1	36,722.4	236,068.0
Total	178,165.8	19,053.1	145,551.2	36,722.4	379,492.5
Difference assets and liabilities	37,104.6	28,170.1	-10,265.7	-31,794.4	
Interest-rate derivatives, net	-8,789.6	-27,773.8	6,723.2	31,806.4	
Net exposure	28,315.0	396.4	-3,542.5	12.0	

31 Dec 2019, SEK M	Up to 3 months	3-12 months	1-5 years	More than 5 years	Total
Loans	211,453.3	18,572.6	86,144.2	1,389.3	317,559.5
Bonds, etc.	9,391.4	14,555.9	28,867.3	682.0	53,496.6
Total	220,844.7	33,128.6	115,011.5	2,071.3	371,056.1
Deposits	123,799.0	1,435.4	510.3	0.0	125,744.7
Debt securities in issue, etc.	29,029.3	22,845.7	136,424.5	37,678.5	225,978.0
Total	152,828.3	24,281.1	136,934.8	37,678.5	351,722.7
Difference assets and liabilities	68,016.3	8,847.5	-21,923.3	-35,607.1	
Interest-rate derivatives, net	-47,165.6	-6,288.8	22,838.2	35,839.5	
Net exposure	20,850.8	2,558.6	914.9	232.3	

#### 6.2.3 Spread risk

Spread risk is defined as the risk of losses arising due to changes in spreads between market interest rates.

In the Consolidated Situation, credit-spread risk arises in the liquidity reserve and currency-basis spread risk arises when hedging funding in foreign currency. Credit-spread and currency-basis spread risk are measured using sensitivity measures for each spread. The capital requirement calculation for spread risks in Pillar II uses a Value-At-Risk model.

#### 6.2.4 Currency risk

Currency risk is the risk of losses arising due to exchange-rate fluctuations and is calculated as the total of the absolute amounts of the change in value per currency.

Currency risk arises in funding in foreign currency, primarily in EUR, CHF and NOK, and is measured as the effect of a momentary +/-10% change in the exchange rate. This risk is managed for each funding by converting the funding to SEK using swap contracts, which then results in no significant currency risk. Total currency risk on 31 December 2020 amounted to SEK 0.0 M (0.0).

#### 6.2.5 Monitoring and reporting

All market risks are measured and controlled on a daily basis. Risk Management monitors the Board's limits every day. The CRO makes continuous reports to the Board, both in writing and verbally, at least once every quarter.

# 7 | Liquidity risk

Liquidity risk is defined as the risk that payment commitments cannot be fulfilled due to insufficient cash funds, or are only able to be fulfilled by funding at a significantly higher cost than normal or by divesting assets at a substantial deficit price.

#### 7.1 RISK APPETITE

The Consolidated Situation's risk appetite for liquidity risk is low. The Board establishes the risk appetite, liquidity risk limits and the direction of liquidity risk management.

#### **7.2 RISK MANAGEMENT**

Liquidity risk is minimised and prevented by forecasting future liquidity requirements, high access to funds, explicit functional definitions and a high level of control. Liquidity risk is managed by the Treasury unit, which is also responsible for meeting the limits for liquidity risk set by the Board. The objective of liquidity risk management is that the Consolidated Situation, at any given time, is to have sufficient liquid assets to fulfil its commitments under both normal and stressed market conditions.

The overall strategy for managing liquidity risk is based on highly diversified funding regarding investor base, instruments, currencies and maturities, and a satisfactory liquidity reserve. The operational liquidity risk management is based on the Bank Group, but also takes into account Länsförsäkringar AB with regard to LCR, NSFR and ALMM, with the requirement that the operations at all times are to meet their liquidity and financing undertakings.

#### 7.2.1 Governance

Governance of the Consolidated Situation is based on limits, governance documents and established business targets. The central measure in the management of liquidity risk comprises the Bank Group's "survival horizon," meaning the period of time during which the Bank Group is able to meet its commitments without requiring access to new financing. The liquidity limit for the survival horizon

has been set at 12 months. Plans for managing disruptions that affect the Bank Group's liquidity are in place and updated annually. A contingency plan group has been appointed and action plans prepared and adopted by the ALCO. Figure 7.1 illustrates the Bank Group's survival horizon on 31 December 2020. The graph shows that contractual undertakings can be satisfied for 27 months (32) by utilising the liquidity reserve alone.

#### Liquidity reserve

The Bank Group's liquidity reserve comprises securities of very high liquidity, credit quality and investments with the Riksbank or the Swedish National Debt Office. Most of the securities holdings are eligible for transactions with the Riksbank and, where applicable, with the ECB or the Federal Reserve, and can be quickly converted to cash and cash equivalents. The Treasury unit monitors and manages the liquidity reserve on a daily basis and is responsible for the amount of the reserve totalling the limits set by the Board.

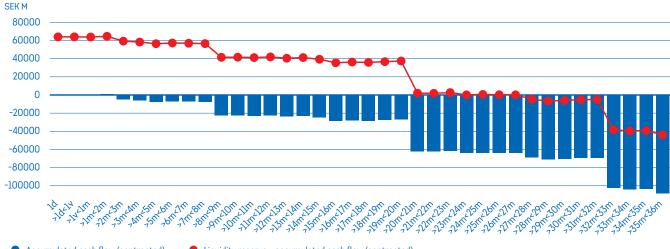
On 31 December 2020, the liquidity reserve amounted to SEK 64.0 billion (60.4) and 44% (48) of the reserve comprised Swedish covered bonds. For a specification of the liquidity reserve, see figure 7.2.

Figure 7.2 Liquidity reserve



The liquidity reserve is invested in securities with high credit quality.
\*99% pertains to AAA-rated bonds

Figure 7.1 Survival horizon on 31 Dec 2020



Accumulated cash flow (contracted)
 Liquidity reserve – accumulated cash flow (contracted)

#### **Funding**

Every year, the Board decides on a funding plan that states the funding requirements and planned liquidity for the Bank Group. The financing plan contains key figures and targets for fulfilment of the objectives. Outcomes are monitored against the plan at every ALCO and Board meeting, and the plan is updated as required.

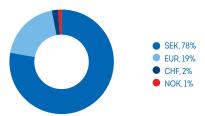
Funding takes place in a manner that creates a sound maturity profile without maturity concentrations, and is broadly diversified in terms of investors and markets. The Bank Group also endeavours to regularly launch issuances to build trust in the international capital markets. Funding takes place primarily through covered bonds since the majority of the Bank Group's lending comprises Swedish mortgages, although senior debt and short-term commercial paper programmes are also used. Wholesale funding primarily takes place in the Swedish market and in SEK. Other funding primarily takes place in SEK, EUR, CHF and NOK. For a specification of the Bank Group's financing and maturity structure, see figures 7.3, 7.4 and 7.5.

Figure 7.3
Funding sources



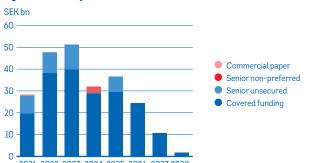
The largest source of financing in the Group is covered bonds, representing 50%.

Figure 7.4
Funding by currency



Wholesale funding primarily takes place in the Swedish market and in SEK.

Figure 7.5 Maturity structure



In its funding operations, the Bank Group is to act predictably and actively in the market and aim at achieving as high liquidity as possible in outstanding debt to ensure healthy diversification and maintain investors' interest and credit limits. Regular meetings are held with both Swedish and international investors to ensure that these investors have a clear overview of the Consolidated Situation's operations, low risk profile and high-quality risk management.

Länsförsäkringar Bank's credit rating from Moody's and S&P remained unchanged at A1/Stable and A/Stable, respectively, during 2020. The stability of Länsförsäkringar Bank's credit rating from rating agencies is positive for the bank's ability to finance its operations at low costs in the capital markets. In addition, Länsförsäkringar Hypotek's covered bonds have the highest rating from both Moody's and Standard & Poor's.

#### 7.2.2 Risk measurement

Liquidity risk is quantified using daily liquidity forecasts based on all contracted cash flows and expected business volumes of deposits and lending. The liquidity portfolio is regularly stress-tested using highly disadvantageous scenarios for the Bank Group. Two stress tests illustrate how long the liquid assets will last, given that the funding market is entirely closed and:

- Business volumes are constant (survival horizon).
- Lending growth is modelled according to the business plan and deposits reduce markedly.

Furthermore, the cover pool is stress tested in various scenarios with housing prices assumed to fall between 5% and 30%.

To comprehensively analyse the liquidity risk, the liquidity limit is supplemented with a number of structural and quantitative risk measures adapted to the Consolidated Situation's risk profile, including a minimum requirement for unutilised amount in the cover pool for the issuance of covered bonds.

The Consolidated Situation's Liquidity Coverage Ratio, as defined by the European Commission delegated act (LCR DA), amounted to 263% (295) at total level on 31 December 2020 and to 1,161% (2,691) in EUR. Refer to Table 7.1 and 7.2 for more information about liquidity buffer and LCR.

The Net Stable Funding Ratio (NSFR) for the Consolidated Situation amounted to 129% (131) on 31 December 2020. A specification of NSFR is presented in Table 7.3.

#### 7.2.3 Monitoring and reporting

Liquidity risk is measured, controlled and reported on a daily basis. Outcomes are monitored against the Board's established guidelines and strategies at every ALCO and Board meeting. Material deviations are immediately reported to the Board, following guidelines established by the Board.

#### Table 7.1 Liquidity buffer

SEKM	31 Dec 2020	31 Dec 2019	Change
Level 1	52,355	57,127	-4,772
of which, central banks	4,962	13,614	-8,652
of which, sovereigns, multilateral development banks, etc.	17,442	14,367	3,075
of which, covered bonds	29,951	29,145	805
Level 2	605	1,517	-912
Other securities	1,067	1,664	-597
Other	9,993	141	9,852
Liquidity reserve	64,020	60,449	3,570
Less deposits	-9,993	-141	-9,852
Other securities	-1,067	-1,664	597
Hedge adjustment	-117	-233	116
Market value deductions	-2,177	-2,264	87
Liquidity buffer	50,666	56,147	-5,481

#### Table 7.2 Liquidity Coverage Ratio (LCR)

SEK M	31 Dec 2020	31 Dec 2019	Change
Deposits	17,409	14,815	2,594
of which, household deposits	6,563	5,588	975
of which, other deposits	10,846	9,228	1,618
Maturity	0	545	-545
Off-balance/Growth	1,315	1,142	174
Derivatives/CSA	3,857	2,424	1,433
Inflows and other	-3,332	104	-3,437
Net outflows	19,249	19,031	219
Liquidity buffer	50,666	56,147	-5,481
Liquidity Coverage Ratio (LCR)	263%	295%	-32 pe

#### Table 7.3 Net Stable Funding Ratio (NSFR)

SEK M	31 Dec 2020	31 Dec 2019	Change
Required Stable Funding (RSF)	278,786	254,419	24,366
of which, liquid assets	6,828	4,398	2,430
of which, other collateral	5,164	5,611	-447
of which, lending	259,878	237,311	22,567
of which, derivatives	733	1,287	-553
of which, other assets	4,922	4,723	199
of which, off-balance	1,261	1,090	170
Available Stable financing (ASF)	361,005	332,428	28,577
of which, own-fund items	24,519	20,252	4,267
of which, household deposits	109,111	96,168	12,943
of which, other non-financial counterparties (except for central banks)	6,012	5,248	764
of which, financial counterparties and central banks	217,181	207,134	10,047
of which, other liabilities	4,183	3,626	557
Net Stable Funding Ratio (NSFR)	129%	131%	-117 bp

#### 7.2.4 Encumbered assets

Encumbered assets are the portion of the company's assets that are pledged in some form. Asset encumbrance entails restrictions on the asset's area of use since the assets serves as collateral and its availability must be ensured at all times. The Consolidated

Situation's main business area is mortgages and to enable market financing via covered bonds, the Consolidated Situation has a high percentage of encumbered assets that comprise the cover pool in Länsförsäkringar Hypotek AB. Refer to Table 7.4 and 7.5 for more information.

Table 7.4 Encumbered assets

31 Dec 2020, SEK M	Carrying amount of encumbered assets	Fair value of encumbered assets	Carrying amount of unencumbered assets	Fair value of unencumbered assets
Consolidated Situation's assets	217,922		205,660	
Shares and participations			102	102
Bonds and other interest-bearing instruments	4,694	4,646	56,850	53,925
Other assets	213,228		148,709	

31 Dec 2019, SEK M	Carrying amount of encumbered assets	Fair value of encumbered assets	Carrying amount of unencumbered assets	Fair value of unencumbered assets
Consolidated Situation's assets	212,112		182,186	
Shares and participations	0	0	106	106
Bonds and other interest-bearing instruments	2,155	2,119	52,961	50,453
Other assets	209,957		128,957	

#### Table 7.5 Encumbered collateral

31 Dec 2020, SEK M	Fair value of encumbered collateral for received and own issued bonds	Fair value of collateral received or issued own bonds
Consolidated Situation's collateral received	-	-
Bonds and other interest-bearing instruments	-	-

31 Dec 2019, SEK M	Fair value of encumbered collateral for received and own issued bonds	Fair value of collateral received or issued own bonds
Consolidated Situation's collateral received	-	-
Bonds and other interest-bearing instruments	-	-

# 8 | Operational risk

Operational risk is defined as the risk of losses arising due to inadequate or failed internal processes, human error, erroneous systems or external events and includes legal and compliance risks.

#### **8.1 RISK APPETITE**

The risk appetite for operational risk is determined by the Board. The Consolidated Situation has a low appetite for operational risk, meaning that these risks are limited as far as possible.

#### **8.2 RISK MANAGEMENT**

Operational risk encompasses the entire banking operations. All employees are responsible for actively managing operational risk within their individual operations. The department that takes the risk owns the risk, which means that the daily management of operational risk primarily takes place in the business operations. Risks are minimised by proactive preventive measures and awareness of operational risk in every decision-making situation. There is also structured monitoring of trends in operational risk.

#### 8.2.1 Risk assessment

Operational risk is mainly categorised as one of the risk categories described in Table 8.1, which are the main operational risk categories to which the Consolidated Situation is exposed.

#### Table 8.1 Consolidated Situation's operational risk categories

Product and process risks	Refer to the risk of losses arising due to established work procedures not functioning well, being unknown to employees or not being appropriate.
Personnelrisks	Refer to the risk of losses arising due to unclear areas of responsibility, inadequate know-how needed for work duties, or a shortage of personnel in relation to work duties.
Legalrisks	Refer to the risk of the company not ensuring or monitoring compliance with laws, regulations or other relevant rules and recommendations, or that signed agreements or other legal documents are correct and valid, not archiving agreements and other legal documents or not managing and following up legal processes.
Compliance risks	Refer to the risk that the company does not ensure or follow up compliance with laws, regulations, general guidelines from the Swedish Financial Supervisory Authority and European authorities or other relevant regulations and recommendation for licensable operations, and the company does not comply with internal rules in this area and thereby is exposed to the risk of authorities imposing sanctions or making other remarks.
IT risks	Refer to the risk of IT systems not being available to the extent decided or not being sufficiently secure. IT risk includes availability and business continuity risk, IT security risk, IT change risk, data integrity risk and IT outsourcing risk. Cyber risk, defined as risks inherent in the use or transfer of digital data, is included in most of the risks described above.
Security risks	Refer to the risk of losses arising due to the bank being exposed to external crimes or internal fraud. It also encompasses the risk of damage to physical assets in the Bank Group.
Modelrisks	Refer to the risk of losses arising due to decisions that are primarily based on the results of models on the basis of errors in the production, implementation or use of such models.

#### 8.2.2 Risk management process

The process for managing operational risk comprises: identification, assessment, monitoring and reporting risks. The main stages are described below:

### Risk evaluation and monitoring controls for assessing operational risk

Risk evaluation is one of the tools used to identify operational risks that could impact the business and to plan risk-limiting activities and controls that the operations have introduced to business processes and follow. These analyses are part of the operations' overall risk assessment.

Assessment of identified operational risk is based on a model that is applied throughout the operations. Each identified risk is assessed on the following basis:

- Probability expected number of risk outcomes per year
- Consequence expected cost each time risks actually materialise. The assessment of consequences includes the following:
  - Costs direct and indirect
  - Customer impact direct customer impact, complaints from customers and reputation risk
  - Compliance risks risk relating to regulatory compliance
  - Other mainly process-related risks or other impacts on the operations

These factors are aggregated to determine a risk value for the operational risk. Each manager is responsible for identifying, assessing, monitoring and managing operational risk in their area of responsibility. The process owner is responsible for documenting the process and its controls and for identifying, evaluating, managing and monitoring operational risk for the process, including its products and services. The risk methods are regularly evaluated with the aim of minimising the risk of these methods themselves giving rise to significant misjudgements of operational risks.

#### **Risk indicators**

The aim of using risk indicators is to create conditions for better insight into the Consolidated Situation's risk profile and the risks that are increasing or reducing at that point in time and over time. The Consolidated Situation has established a number of risk indicators tailored to the Consolidated Situation's operations. The Consolidated Situation works continuously on revising these risk indicators, which are annually.

#### **Approval process**

The Consolidated Situation has a process for approving new or significantly changed products, services, markets, processes, IT systems and for major changes to the operations and organisation and in the case of exceptional transactions. The purpose of the approval process is to achieve efficient and appropriate management of the risks that may arise in connection with change work and the impact on capital, to ensure that products and changes that are approved are compatible with risk strategy and risk appetite, and to create customer value. The established risk model is applied to the assessment of each individual risk, as it is to all operational risks. Risk Management and Compliance are two of the stakeholders in implementing the approval process.

#### **Incident reporting**

Incidents that occur in the Consolidated Situation's operating activities are to be reported using the incident reporting system, which all employees have access to. Incidents are to be reported and managed as far as possible in the business area or the process in which the risk arises. The responsibility for analysing incidents and taking measures lies with the head of the process or operations.

Risk Management continuously monitors incidents reported in the business activities. Reported incidents are categorised based on a shared risk tree (risk taxonomy).

#### **Continuity management**

Continuity management involves measures to be taken to manage serious and extensive plan business interruptions, disruptions or crises, to maintain the operations in such cases and the operations' priorities and procedures when returning to normal operations after an interruption or major business disruption. Business contingency, continuity and recovery plans have been produced in the operations to support employees and managers in a crisis and if a serious event were to occur. Crisis training is conducted at least once annually to ensure that the plans are suitable.

#### 8.2.3 Monitoring and reporting

Risk Management continuously monitors the Consolidated Situation's operational risk. In addition, an aggregated operational risk report is submitted to the Board and relevant committees every quarter.

# 9 | Remuneration policy

Information about the company's remuneration policy is available on the website:

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