

Individual Solvency Need Nordea Bank Danmark Group 30 September 2012



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1 Introduction

This report presents the individual solvency need (tilstrækkelig basiskapital og solvensbehov for pengeinstitutter) for the Nordea Bank Danmark Group and its legal entities, Nordea Bank Danmark A/S and Nordea Kredit Realkreditaktieselskab. The purpose of this report is to fulfil external disclosure requirements regarding the solvency need according to the Financial Business Act (Lov om finansiel virksomhed jf. lovbekendtgørelse nr. 705 af 25. Juni 2012), og bekendtgørelse nr. 1399 af 16. december 2011 (kapitaldækningsbekendtgørelsen) og bekendtgørelse nr. 764 af 24. Juni 2011 (bekendtgørelse om basiskapital).

An update of the individual solvency need is published each quarter and is available on Nordea's Investor Relations website (nordea.com/ir) and links can be found on each legal entity's website. Details about the Nordea Bank Danmark Group's and its legal entities' risk profile and key exposures are available in the annually disclosed Capital adequacy and risk management (Pillar 3) report for the Nordea Bank Danmark Group, also available on Nordea's Investor Relations website. Reference to the individual solvency need reporting is made in the annual report and the interim report for Nordea Bank Danmark A/S and Nordea Kredit Realkreditaktieselskab.

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

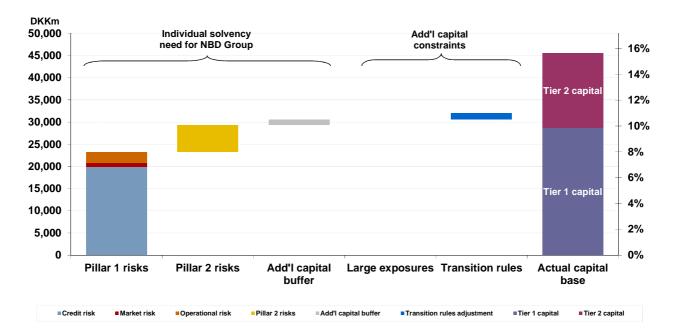
1.1 Main conclusions

The Nordea Bank Danmark Group and its individual legal entities are well capitalised at end-Q3 2012 and have access to available capital from Nordea Bank AB (publ), the parent company of the Nordea Bank Danmark Group, if necessary.

- The individual solvency need at end-Q3 2012 for the Nordea Bank Danmark Group and Nordea Bank Danmark A/S remains unchanged at 10.5%. The individual solvency need is in excess of the legal minimum requirement of 8%.
- The individual solvency need for Nordea Kredit Realkreditaktieselskab at end-Q3 2012 is unchanged at 10%.
- The Nordea Bank Danmark Group and its legal entities conduct capital adequacy stress testing in collaboration with the Nordea Group to ensure that adequate capital is available within the Nordea Bank Danmark Group and its parent company in the event of, for instance, severe credit losses or changes in regulatory capital requirements.

2 Definition of the individual solvency need

The definition of the individual solvency need and changes in methodology are described below. For more details on capital measurement and handling of specific risks, please see the Nordea Bank Danmark Group's Pillar 3 report as well as previous individual solvency need reports available on Nordea's Investor Relations website.





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

In addition, Pillar 2 risks, that is, risks not included in the CRD, are considered – specifically concentration risk, interest rate risk in the banking book, market risk in internal defined pension plans, real estate risk and business risk, which captures the P&L volatility.

Also included in the Pillar 2 requirement are two temporary capital allocations. The purpose of the first capital allocation is to compensate for some inherent risks in the household portfolio that are not fully reflected in the customer ratings. Actions have been conducted during 2011; however, enhanced focus and additional actions have been assessed necessary. These process improvements have been implemented during the first half of 2012, among other things to fulfill the requirement according to the new provisioning rules published by the FSA, which affect the Pillar 1 calculation. A reversal, partly or fully, of the temporary capital allocation - made in 2010 - is likely by end Q4 2012. The final review of the effect from the process improvements will be conducted in Q4 2012. The second capital allocation is to reflect that the current average Actual Default Frequency (ADF) exceeds the Probability of Default (PD) used in the Pillar 1 capital requirements for the IRB corporate and institutions portfolio. The actual default ratio peaked in 2010 and has decreased afterwards. However, the 2011 level was still above the used PD level meaning that the average

actual default ratio increased compared to the used PD. Hence, the add-on for the corporate and institutions portfolio were adjusted during 2011 from 8.5% to 10% which still in Q3 2012 remains to be the adequate add-on level.

Finally, additional capital is designated to provide buffers above current capital requirements in the event of unexpected changes to the capital base and/or risk-weighted assets. For the Nordea Bank Danmark Group and Nordea Bank Danmark A/S, this buffer is the difference between the measured Pillar 1 and Pillar 2 risks (including the interim allocations) and the 10.5% individual solvency need. The individual solvency need of 10.5% for the Nordea Bank Danmark Group allows for an internal buffer at end-Q3 of 42 bps, which equals DKK 1,215m. For Nordea Kredit Realkreditaktieselskab the buffer is the difference between the measured Pillar 1 and Pillar 2 risks and the 10% individual solvency need.

In addition to the individual solvency need, there are regulatory capital constraints related to large exposures and Basel II transition rules. At end-Q3 2012, large exposures and transition rules are not a material constraint for Nordea Bank Danmark A/S, but the Nordea Bank Danmark Group and Nordea Kredit Realkreditaktieselskab are affected by transition rules. Transition rules increase the capital requirement for Nordea Bank Danmark Group by DKK 1,443m and for Nordea Kredit Realkreditaktieselskab by DKK 3,462m.

3 Individual solvency need and capital base

3.1 Individual solvency need

The individual solvency need for the Nordea Bank Danmark Group and its legal entities at end-Q3 2012 is presented in detail in the table below.

Table 1 The Nordes Penk Danmark Crow	n and its logal antitios	individual colvonor	r need at and O2 2012
Table 1. The Nordea Bank Danmark Group	b and its legal endlies	– muiviuuai soivenev	need at end-05 2012

	Nordea Bank	Nordea Bank	Nordea Kredit
DKKm	Danmark Group	Danmark A/S	Realkreditaktieselskab
Credit risk	21,421	19,587	7,269
IRB approach	18,537	14,502	5,751
- of which corporate	11,286	8,965	2,519
- of which institutions	395	395	0
- of which retail mortgage	2,998	426	2,497
- of which retail revolving	0	0	0
- of which retail other	3,587	4,568	652
- of which equity	0	0	0
 of which assets without counterparty 	271	149	83
- of which securitisation	0	0	0
SA approach	1,409	4,752	1,401
- of which sovereign	27	27	0
- of which institutions	263	1,052	1,385
- of which corporate	51	1,158	0
- of which retail	315	0	0
- of which retail mortgage	0	0	0
- of which other	265	0	0
- of which past due items	76	0	0
- of which short-term claims on institutions and corporate	0	0	0
- of which equity	393	2,510	1
 of which assets without counterparty 	19	5	15
- of which securitisation	0	0	0
Concentration risk	1,475	332	118
Market risk	1,570	1,495	10
 of which trading book, internal approach 	720	720	0
 of which trading book, standardised approach 	201	126	0
 of which banking book, standardised approach 	0	0	0
- of which IRR in the banking book	318	318	10
- of which real estate risk	159	159	0
- of which pension plans	172	172	0
Operational risk	2,424	2,287	182
Other risks	5,154	6,014	1,706
- of which business risk	2,071	1,998	51
- of which temporary capital allocation for household portfolio	700	700	0
 of which corporate and bank ADF/PD adaption 	1,168	936	0
- of which additional internal buffers	1,215	2,380	1,656
Individual solvency need (adequate capital base)	30,569	29,383	9,167
Additional capital requirement due to legal demands	0	0	0
Adjusted individual solvency need (adjusted adequate capital base)	30,569	29,383	9,167
Individual solvency need pct. for Credit risk	7.4%	7.0%	7.9%
Individual solvency need pct. for Market risk	0.5%	0.5%	0.0%
Individual solvency need pct. for Operational risk	0.8%	0.8%	0.2%
Individual solvency need pct. for Other risks	1.8%	2.1%	1.9%
Individual solvency need pct. incl. additional internal buffers	10.5%	10.5%	10.0%
Individual solvency need pct. excl. additional internal buffers	10.1%	9.6%	8.2%
Tier 1 capital	28,634	28,112	13,997
Capital base	45,514	45,585	13,997
Pillar 1 RWA	291,137	279,834	91,672
Actual Tier 1 ratio	9.8%	10.0%	15.3%
Actual capital ratio	15.6%	16.3%	15.3%

3.2 Capital base

The capital base for the Nordea Bank Danmark Group and its legal entities at end-Q3 2012 is presented in detail in the table below.

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Table 2. The Nordea Bank Danmark Grou	id and its legal entities – ca	ipital base at end-03 2012

DKKm	Nordea Bank Danmark Group	Nordea Bank Danmark A/S	Nordea Kredit Realkreditaktieselskab
Calculation of total capital base			
Original own funds			
Paid-up capital	5,000	5,000	1,717
Share premium	0	0	
Eligible capital	5,000	5,000	1,71
Reserves	26,697	26,697	14,04
Minority interests	1,265	0	(
Income (positive/negative) from current year	0	0	(
Eligible reserves	27,962	26,697	14,040
Tier 1 capital (before hybrid capital and deductions)	32,962	31,697	15,75
Hybrid capital loans subject to limits	0	0	
Proposed/actual dividend	0	0	
Deferred tax assets	-116	0	
Intangible assets	-2,992	-2,959	-
Deductions for investments in credit institutions	-245	-245	
IRB provisions excess (+) / shortfall (-)	-974	-381	-1,75
Other items, net	0	0	
Deductions from original own funds	-4,328	-3,585	-1,76
Tier 1 capital (net after deduction)	28,634	28,112	13,99
- of which hybrid capital	0	0	(
Additional own funds	0	0	
Securities of indeterminate dur. and other instr.	0	0	(
Subordinate loan capital	18,080	18,080	
Other additional own funds	20	20	(
Tier 2 capital (before deductions)	18,100	18,100	(
Deductions for investments in credit institutions	-245	-245	(
IRB provisions excess (+) / shortfall (-)	-974	-381	
Deductions from original additional own funds	-1,220	-626	(
Tier 2 capital (net after deductions)	16,880	17,473	
Total own funds for solvency purposes	45,514	45,585	13,997