





Notification template for Article 131 CRD – Global Systemically Important Institutions (G-SIIs)

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| 1. Notifying national authority | | |
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| 1.1 Name of the notifying authority | Finnish Financial Supervisory Authority, FIN-FSA | |
| 2. Description of the measure | | |
| | Nordea Group 6SCPQ280AIY8EP3XFW53 | |
| 2.1 Concerned institution(s) | The decision taken is conditional and presupposes that the competent authority of Sweden does not oppose the cross-border merger of Nordea Bank AB and Nordea Holding Oyj decided on by the shareholders' meeting of 15 March 2018. The FIN-FSA Board will take its final conditional decision on 29 June 2018 subsequent to the decision on Nordea's banking license. | |
| 2.2 Level of the buffer applied | 1.0 % | |
| | Nordea Mortgage Bank Plc 7437001LESKGLAEOEU84 | |
| 2.3 Names of subsidiaries | | |
| 3. Timing of the measure | | |
| 3.1 Timing of the Decision | 29 June 2018 | |
| 3.2 Timing of the Publication | 29 June 2018 | |
| 3.3 Disclosure | FIN-FSA website | |
| 3.4 Timing of Application | 1 January 2020 | |

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| 3.5 Phasing in | n.a. | |
|---|---|--|
| 4. Reason for activation of the G-SII buffer | | |
| 4.1 Indicators used for designation of the G-SII (Article 131.2) | Size (20%), Total exposures as defined for use in the Basel III leverage ratio 558 586 mEUR (year-end 2016) | |
| | Interconnectedness (20%), intra-financial system assets (6,67%), 90 235 mEUR, intra-financial system liabilities (6,67%), 44 673 mEUR, securities outstanding (6,67%), 245 041 mEUR | |
| | Substitutability/financial institution infrastructure (20%), assets under custody (6,67%), 711 000 mEUR, payments activity (6,67%), 34 814 323 mEUR, underwritten transactions in debt and equity markets (6,67%), 59 403 mEUR | |
| | Complexity (20%), notional amount of over-the-counter (OTC) derivatives (6,67%), 6 779 147 mEUR, level 3 assets (6,67%), 2 470 mEUR, trading and available-for-sale securities (6,67%), 21 544 mEUR | |
| | Cross-jurisdictional activity (20%), cross-jurisdictional claims (10%), 357 942 mEUR, cross-jurisdictional liabilities (10%), 344 864 mEUR | |
| | See also enclosed Excel-file. | |
| 4.2 Scores and buckets (Article 131.2 and 131.9) | The overall score for Nordea is 114. The scores attributed to each of the categories are: 74, 116, 104, 80 and 201. Qualitative supervisory judgement has been applied. As a result, Nordea is allocated to the first bucket in accordance with the Financial Stability Board recommendation of 21 November 2017. The use of supervisory judgement is motivated by: i) Nordea being classified as a G-SII/B since the establishment of the standard without significant changes to its business model, ii) cross-border activities constituting a major part of the bank's overall business and iii) Nordea being highly dependent on market financing and iv) Nordea being systemically significant in several countries. See also enclosed Excel-file. | |
| 5. Cross-border and cross-sector impact of the measure | | |
| 5.1 Assessment of cross- border effects and the likely impact on the internal market (Recommendation ESRB/2015/2) | A G-SII/B buffer of 1.0% applicable to Nordea increases capital requirements and in principle induces incentives for domestic and cross-border spillovers via risk adjustment and regulatory arbitrage. However, the G-SII/B buffer is not cumulative relative to the higher systemic risk buffer and O-SII buffer which implies a non-significant effect in this respect. | |
| 5.2 Assessment of leakages and regulatory arbitrage within the notifying Member State | See 5.1 | |

6. Combinations and timing of the G-SII notified

| 6.1 combinations between G- SII and O-SII buffers (Article 131.14) | An O-SII buffer of 2.0 % is planned for Nordea Group. | |
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| 6.2 Combinations with SRB buffers (Article 131.14 + Article 133.5) | A systemic risk buffer of 3.0 % is planned for Nordea Group. The systemic risk buffer will be apply on a consolidated level and cover the total risk of Nordea Group. | |
| 6.3 Interaction with other measures | See 5.1. | |
| 7. Miscellaneous | | |
| 7.1 Contact person(s) at notifying authority | Peik Granlund, tel. +358-9-183 5236, peik.granlund@fiva.fi | |
| 7.2 Any other relevant information | | |