MOODY'S INVESTORS SERVICE

CREDIT OPINION

13 November 2018

Update

Rate this Research

RATINGS

SpareBank 1 SR-Bank ASA

Domicile	Norway
Long Term CRR	Aa3
Type	LT Counterparty Risk Rating - Fgn Curr
Outlook	Not Assigned
Long Term Debt	A1
Type	Senior Unsecured - Fgn Curr
Outlook	Negative
Long Term Deposit	A1
Type	LT Bank Deposits - Fgn Curr
Outlook	Negative

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

Please see the ratings section at the end of this report

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SpareBank 1 SR-Bank ASA

Update to credit analysis

Summary

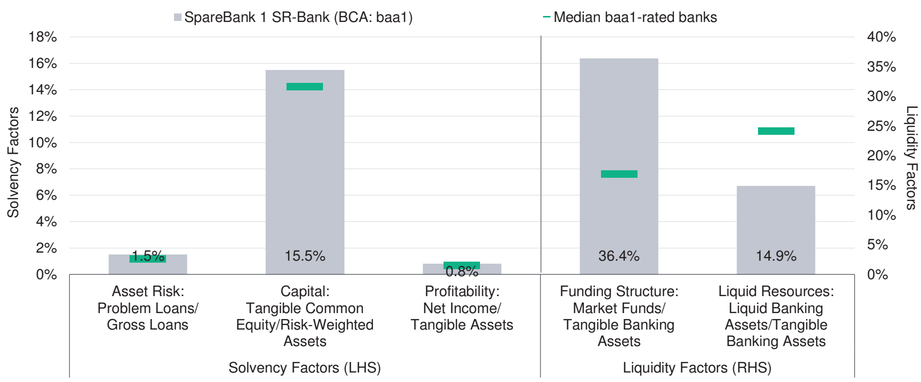
SpareBank 1 SR-Bank's long-term deposit and senior unsecured debt ratings of A1 take into account the bank's baseline credit assessment (BCA) of baa1, but also our loss given failure (LGF) analysis and government support assumptions which, together, result in three notches of rating uplift from its BCA.

SpareBank 1 SR-Bank's BCA of baa1 primarily reflects the bank's solid regional position, good capital buffers (Common Equity Tier 1 capital ratio of 14.7% at end-September 2018), resilient pre-provision income combined with lower credit impairments, and also its robust liquidity position. These strengths are balanced against the bank's limited geographic reach, which results in high credit risk concentrations in more volatile sectors, such as oil/offshore and commercial real estate. Despite a slight increase in the bank's problem loans and related impairments in recent years, driven mainly by exposure to the oil sector, its robust risk management systems have helped the bank maintain sound asset quality with stage 3 loans to gross loans (including covered bond loans) ratio of 1.3% at end-September 2018.

The bank's BCA also reflects the resilient performance of the bank in recent years despite some challenges in certain oil-related exposures, as well as Moody's forward-looking expectation that the bank's asset quality, profitability and capitalization will remain robust in a gradually improving operating environment. Concurrently, the BCA considers the bank's relatively high dependence on market funding, and more specifically on covered bonds, a common feature among Norwegian banks.

Exhibit 1

Rating Scorecard - Key financial ratios



Source: Moody's Financial Metrics

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Credit strengths

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

» A good capital buffer provides protection from current and future credit losses

» Comfortable liquidity position

» Large volume of deposits and junior debt result in deposit ratings benefiting from a very low loss-given-failure rate, with a two notch uplift from the BCA

Credit challenges

» Exposures to oil-related and commercial real estate volatile sectors pose risks to asset quality

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

» Reliance on market funding renders the bank vulnerable to fluctuations in investor sentiment

Rating Outlook

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

Factors that could lead to an upgrade

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

Factors that could lead to a downgrade

Future downward rating pressure would emerge if (1) Sparebank 1 SR-Bank's problem loans ratio increases significantly above our system-wide expectation of approximately 2%; (2) financing conditions become more difficult; (3) the bank's risk profile increases, for example as a result of increased exposures to more volatile sectors or if the quality of the oil-related portfolio deteriorates further; (4) the macroeconomic environment weakens more than currently anticipated, leading to a lower Macro Profile; (5) a reduction in the rating uplift as a result of our LGF analysis; and/or (6) the eventual passage of the official resolution law (BRRD) in Norway and revision of our government support assumptions, although the resulting rating impact could be neutralised by the MREL-eligible/loss-absorbing senior non-preferred debt that the bank is likely to raise by 2022.

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

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Key indicators

Exhibit 2
SpareBank 1 SR-Bank ASA (Consolidated Financials) [1]

	6-18[2]	12-17[2]	12-16[2]	12-15[2]	12-14[2]	CAGR/Avg.[3]
Total Assets (NOK billion)	239	231	218	221	208	4.0[4]
Total Assets (EUR million)	25,063	23,540	24,023	22,959	22,904	2.6[4]
Total Assets (USD million)	29,262	28,266	25,338	24,940	27,715	1.6[4]
Tangible Common Equity (NOK billion)	20	20	18	17	15	7.3[4]
Tangible Common Equity (EUR million)	2,062	1,996	1,999	1,736	1,689	5.9[4]
Tangible Common Equity (USD million)	2,407	2,396	2,108	1,886	2,044	4.8[4]
Problem Loans / Gross Loans (%)	1.5	1.1	1.2	0.8	0.5	1.0[5]
Tangible Common Equity / Risk Weighted Assets (%)	15.5	16.3	15.6	14.0	12.7	14.8[6]
Problem Loans / (Tangible Common Equity + Loan Loss Reserve) (%)	14.0	10.1	11.4	8.0	5.9	9.9[5]
Net Interest Margin (%)	1.5	1.5	1.5	1.5	1.7	1.5[5]
PPI / Average RWA (%)	2.3	2.3	2.1	1.6	1.9	2.0[6]
Net Income / Tangible Assets (%)	1.0	0.9	0.7	0.7	0.9	0.9[5]
Cost / Income Ratio (%)	43.7	44.1	45.0	51.3	48.4	46.5[5]
Market Funds / Tangible Banking Assets (%)	32.8	36.4	38.1	40.6	42.9	38.2[5]
Liquid Banking Assets / Tangible Banking Assets (%)	14.8	14.9	12.4	10.8	9.6	12.5[5]
Gross Loans / Due to Customers (%)	182.8	196.2	212.2	205.6	214.1	202.2[5]

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

Profile

SpareBank 1 SR-Bank is the leading financial group in Southern and Western Norway and the fifth largest bank in Norway in terms of consolidated assets. The financial group provides a range of products and services, including traditional banking services such as loans, insurance and savings products, as well as securities trading, accounting services and estate agency services for retail as well as corporate customers. As of 30 September 2018, its consolidated assets (including loans transferred to covered bond companies) totalled NOK239 billion.

Detailed credit considerations

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

SpareBank 1 SR-Bank's operating environment is purely domestic and its Macro Profile is thus aligned with that of Norway, at Very Strong-. Norwegian banks benefit from operating in a wealthy and developed country with very high economic, institutional and government financial strength as well as very low susceptibility to event risk. Norway has a diversified and growing economy, which demonstrated resilience to the past weakening in the oil sector. The main risks to the banking system stem from the high level of household indebtedness, elevated real estate prices and domestic banks' extensive use of market funding. However, these risks are mitigated by the strength of households' ability to service debt, banks' adequate capitalization and the relatively small size of the banking system compared with the total size of the economy.

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

SpareBank 1 SR-Bank's Common Equity Tier 1 (CET1) ratio of 14.7% at end-September 2018 (see Exhibit 3) was in line with the 14.8% at end-September 2017, but well above the increased regulatory requirement, as the bank took initiatives to enhance its capital buffer against potential future losses. The FSA has assigned a Pillar 2 requirement of 2.0% to SpareBank 1 SR-Bank, which combined with the increased countercyclical buffer of 2.0% results in a regulatory CET1 requirement of 14% effective as of 31 December 2017. The bank's CET1 target was accordingly revised to 15% from 14.5%, including a 1% management buffer above the new regulatory requirement.

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

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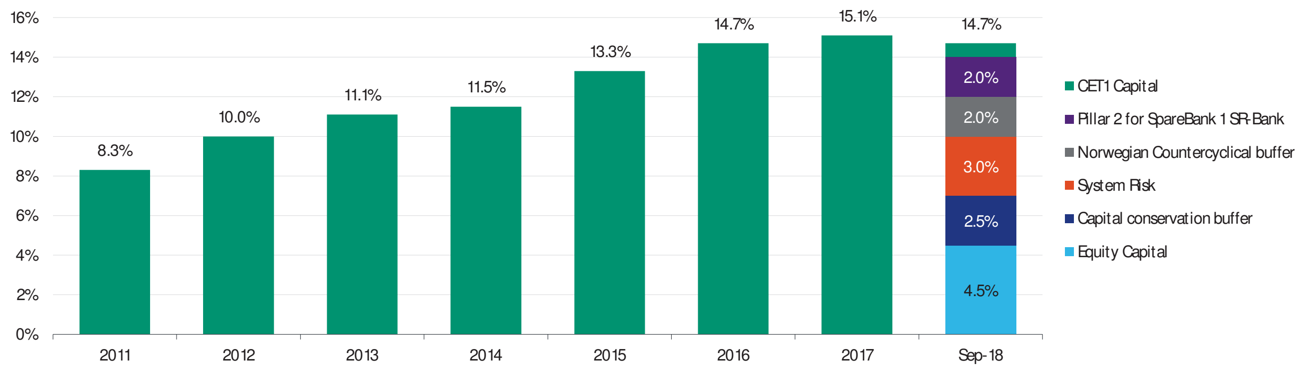
Exhibit 3
SpareBank 1 SR-Bank CET1 development



Source: Company reports and presentations, Moody's Investors Service

The bank's Tangible Common Equity (TCE) has been supported by good earnings generation and retained earnings. We also note that the bank's Tier 1 capital ratio was 16.0% and the total capital adequacy ratio was 17.8% at end-September 2018. Such capital metrics compare favourably with other Nordic banks, as the transitional rules in Norway envisage that the minimum requirement for capital adequacy cannot amount to less than 80% of the corresponding amount calculated according to the Basel I rules.

Moreover, the bank's leverage ratio was satisfactory at 7.7% at end-September 2018, up from 7.2% the year before, significantly higher than both international and Norwegian requirements. This is despite the bank increasing its dividend payment to NOK4.25 per share (52% payout ratio) in 2017 from NOK2.25 in 2016. Looking ahead, we expect SpareBank 1 SR-Bank to target an annual payout ratio of 50%, unless financial needs or capital requirements dictate otherwise in order to maintain a CET1 ratio of at least 15%.

We note that the FSA has recently announced a proposal to designate large regional banks with more than 10% corporate lending market share in one or more defined regions, as systemically important financial institutions (SIFI). Accordingly, SpareBank 1 SR-Bank would likely have an additional Common Equity Tier 1 (CET1) capital requirement of 2% of its risk-weighted assets (RWAs) and 1% in terms of its regulatory leverage ratio, should the proposal be accepted by the Ministry of Finance. However, the transposition of the CRD IV directive into Norwegian law on 1 January 2019 (most likely at the same time as the SIFI regulation is introduced), is expected to neutralise the bank's capital impact from the SIFI regulation.

Exposures to oil-related and commercial real estate volatile sectors pose risks to asset quality

We consider the SpareBank 1 SR-Bank's asset quality to be satisfactory, despite some deterioration in recent years (see Exhibit 4) due to Norway's off-shore industry that faced challenges from reduced investments and lower oil prices in 2015-2016. Problem loans (or stage 3 loans classified under IFRS 9) accounted for 1.3% of gross loans (including covered bond loans) at end-September 2018, an increase from 0.95% at end-March 2018. The increase is largely explained by one commitment in the offshore/oil and gas sector that was classified as a Stage 3 loan in the second quarter of 2018. We note that the bank's loan losses in 2017-18 mainly relate to commitments within the oil industry. The Norwegian Petroleum Directorate expects a marginal increase of 1.5% in oil investments in 2018 followed by an increase of around 10% in 2019, which will likely improve economic activity in the region and further reduce the bank's asset risk.

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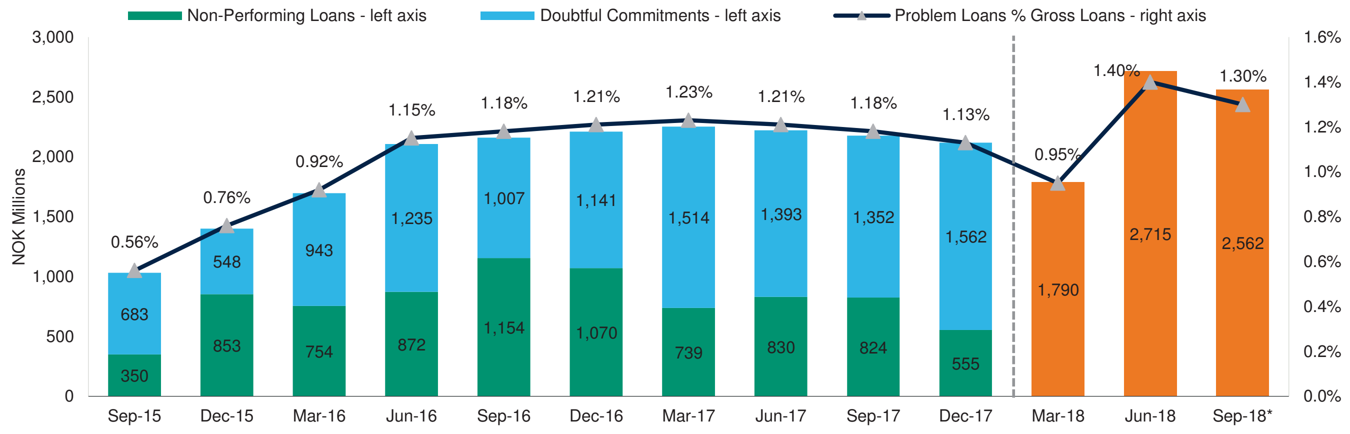
Exhibit 4
SpareBank 1 SR-Bank's problem loans



*IFRS 9 gross Stage 3 loans, not comparable with IAS 39 metrics.
Source: Company reports and presentations, Moody's Investors Service

SpareBank 1 SR-Bank is one of the highest exposed Norwegian banks to the oil and gas sector, with related exposures (including oil services, oil and gas, and offshore) at end-September 2018 comprising around 6% of its total gross loan book (6.1% of total exposure at default relates to oil operations, including loans in covered bond companies). Loans to the offshore industry (OSVs, rigs and seismic vessels) account for around 4.1% of total gross loans, while oil service companies comprise 1.7%, and oil and gas companies account for 0.9%. The bank calculates its approximately NOK1.4 billion exposure to 21 rigs as having an average weighted probability of default in its overall portfolio at 3.9% (highest average weighted probability of default, constituting the most risky assets on its balance sheet), and NOK5.9 billion to 83 OSVs (of which NOK5.3 billion has been restructured) with an average weighted probability of default at 2.9%. However, the recent pick up in oil prices is likely to contain the potential credit losses in the industry.

In addition, the bank is also exposed to the commercial real estate sector (15.6% of gross loans at end-September 2018), a significant part of which is located in the county of Rogaland, where reduced oil investments in the past lead to vacancy rate increases, although the situation has improved more recently. This exposure combined with its sizeable mortgage loan book, could leave the bank vulnerable to any unexpected material decrease in property prices, a feature shared with other Norwegian savings banks. However, we note that almost 90% of the bank's mortgage exposures have a loan-to-value (LTV) ratio of lower than 85%.

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

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

Despite the elevated risks that SpareBank 1 SR-Bank faces through its oil-related exposures, it increased its pre-provision income by around 5% year-on-year in the nine months ending in September 2018 as a result of increased net interest income, a high level of income from financial investments, cost containment, and lower loan losses. Net income increased by 7% in the nine months ending in September 2018 compared to the same period in 2017, driven by the bank's increased lending volume. Net income for the nine months 2018 increased by 16% year-on-year and the bank's loan losses decreased significantly to NOK232 million compared to NOK423 million the previous year. The reduction in loan losses reflects the increasing optimism in the bank's home region on the back of higher oil prices.

The bank's credit costs decreased to 0.16% of gross loans (including covered bond loans) in the nine months ending in September 2018 from 0.31% in the same period last year. For full-year 2018, the bank expects loan losses to fall within the range of NOK300-400 million, despite the adoption of IFRS 9 with new more conservative principles for write-downs from January 2018 onwards. The bank revised its guidance on loan losses for full-year 2018 from NOK400-500 million it was expecting at end-June 2018.

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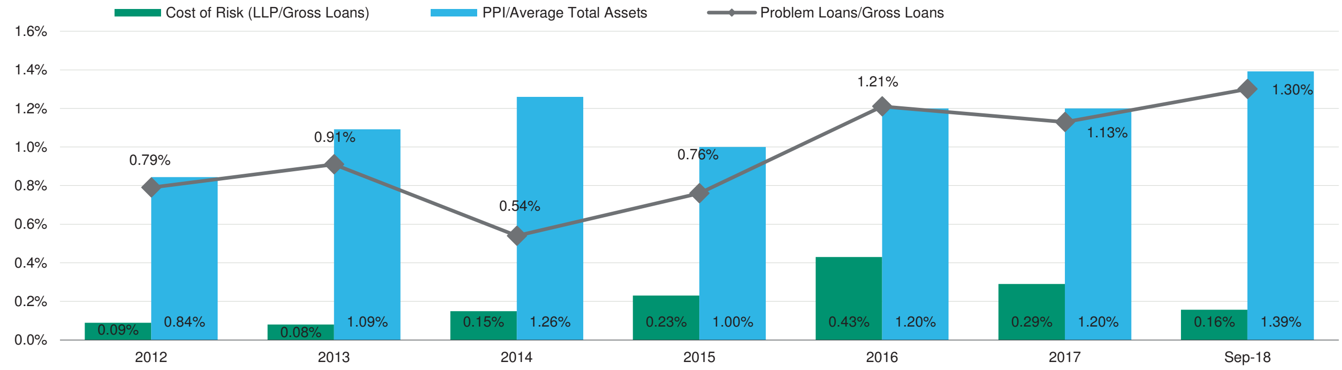
Exhibit 5
SpareBank 1 SR-Bank's Cost of Risk and PPI evolution



PPI/Average Total Assets for 3Q 2018 is an estimate based on annualised and unadjusted figures
Source: Company reports and presentations, Moody's Investors Service

Net interest income continues to be SpareBank 1 SR-Bank's main source of earnings, corresponding to 61% of the bank's total income in the nine months ending in September 2018. When including net interest income (classified as commission) from the SpareBank 1 alliance covered bond companies, net interest income comprised around 63% of total income in the same period. SpareBank 1 SR-Bank recently raised its interest rate on residential mortgages by 25 basis points due to increasing money market rates. Consequently, the bank will also adjust its deposit rate in November 2018.

The net commission income provides diversification in the bank's total revenues, with net commission income (excluding net interest income classified as commission income) constituting around 25% of the total income in the nine months ending in September 2018. Overall, SR-Bank's cost efficiency remained favourable with one of the lowest cost-to-income ratios (40.3% in the nine months ending in September 2018) among the large Norwegian Savings Banks. We note that the bank targets a growth in operating expenses of less than 3% (nominal cost growth) in 2018, although we understand that IT-related expenses will increase at a higher rate.

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

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

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

SpareBank 1 SR-Bank also benefits from a good deposit base, which represented around 50% of total liabilities (including covered bonds issued through SpareBank 1 Boligkreditt and SpareBank 1 Næringskreditt) at end-September 2018, which has proven to be resilient and stable over many years. Deposits from customers increased by around 2% as of end-September 2018 compared to the same time last year. Nonetheless, the bank's gross loans-to-deposits ratio, including transferred loans, was around 196% at end-September 2018.

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

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At end September 2018, the bank had transferred around NOK13 billion to Sparebank 1 Boligkreditt and NOK0.4 billion to SpareBank 1 Næringskreditt, i.e. 7% of its total loan book (including transferred loans). In addition, in the second quarter of 2015 the bank set up SR-Boligkreditt as a wholly owned covered bond company, to diversify and optimise its funding by gradually shifting its cover bond activity to this entity. While we view positively the diversification benefit of covered bond funding, extensive use of covered bond funding increases the amount of pledged assets unavailable for unsecured bondholders, including depositors in liquidation.

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

A mitigating factor to the bank's reliance on market funds is its improved liquidity buffer. The liquidity buffer of NOK31.1 billion or around 13.8% of total assets at end September 2018 consists mainly of cash, short term repos, and covered bonds. However, we note that this ratio somewhat understates the core liquidity of the bank, given that it does not take into account the liquid assets held by SpareBank 1 Boligkreditt and SpareBank 1 Næringskreditt. Accordingly, we incorporate a positive adjustment in the assigned Liquid Resources Score to reflect the additional source of liquidity stemming from the covered bond companies.

In addition to the liquidity buffer, the bank has NOK12.7 billion in home mortgages ready to be transferred to a covered bond company, while it reported a commendable liquidity coverage ratio (LCR) of 151% at end September 2018, combined with a net stable funding ratio (NSFR) of 120%.

Support and structural considerations

Loss Given Failure and additional notching

Norway will shortly implement the EU's Bank Recovery and Resolution Directive, which confirms our current assumptions regarding LGF analysis. For our resolution analysis, we assume residual tangible common equity of 3% and losses post-failure of 8% of tangible banking assets, a 25% run-off in "junior" wholesale deposits, a 5% run-off in preferred deposits, and assign a 25% probability to deposits being preferred to senior unsecured debt. These are in line with our standard assumptions.

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

Government support

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

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

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

Counterparty Risk Assessment

CR Assessments are opinions of how counterparty obligations are likely to be treated if a bank fails and are distinct from debt and deposit ratings in that they (1) consider only the risk of default rather than the likelihood of default and the expected financial loss suffered in the event of default and (2) apply to counterparty obligations and contractual commitments rather than debt or deposit

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instruments. The CR Assessment is an opinion of the counterparty risk related to a bank's covered bonds, contractual performance obligations (servicing), derivatives (e.g., swaps), letters of credit, guarantees and liquidity facilities.

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

SpareBank 1 SR-Bank's CR Assessment is positioned at Aa3(cr)/Prime-1(cr), four notches above the bank's adjusted BCA of baa1, based on the substantial cushion against default provided to the senior obligations represented by the CRA by subordinated instruments, along with one notch of government support. The main difference with our Advanced LGF approach used to determine instrument ratings is that the CRA captures the probability of default on certain senior obligations, rather than expected loss, therefore we focus purely on subordination and take no account of the volume of the instrument class.

Counterparty Risk Ratings (CRR)

Counterparty Risk Ratings are opinions of the ability of entities to honour the uncollateralized portion of non-debt counterparty financial liabilities (CRR liabilities) and also reflect the expected financial losses in the event such liabilities are not honoured. CRR liabilities typically relate to transactions with unrelated parties. Examples of CRR liabilities include the uncollateralized portion of payables arising from derivatives transactions and the uncollateralized portion of liabilities under sale and repurchase agreements. CRRs are not applicable to funding commitments or other obligations associated with covered bonds, letters of credit, guarantees, servicer and trustee obligations, and other similar obligations that arise from a bank performing its essential operating functions.

SpareBank 1 SR-Bank's CRR is positioned at Aa3/Prime-1

The CRR, prior to government support, is positioned three notches above the adjusted BCA of baa1, reflecting the extremely low loss given failure from the high volume of instruments that are subordinated to CRR liabilities. The bank's CRR benefits from one notch of rating uplift based on government support, in line with our assumptions on senior debt and deposits.

Foreign currency debt rating

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

About Moody's bank Scorecard

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

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Rating methodology and scorecard factors

Exhibit 6

SpareBank 1 SR-Bank ASA

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

Factor	**Historic Ratio**	**Initial Score**	**Expected Trend**	**Assigned Score**	**Key driver #1**	**Key driver #2**
Solvency						
Asset Risk						
Problem Loans / Gross Loans	1.5%	aa3	←→	baa1	Geographical concentration	Sector concentration
Capital						
TCE / RWA	15.5%	aa2	←→	aa2		
Profitability						
Net Income / Tangible Assets	0.8%	baa1	←→	baa2	Earnings quality	Expected trend
Combined Solvency Score		a1		a2		
Liquidity						
Funding Structure						
Market Funds / Tangible Banking Assets	36.4%	ba2	←→	ba2	Market funding quality	
Liquid Resources						
Liquid Banking Assets / Tangible Banking Assets	14.9%	baa3	←→	baa2	Quality of liquid assets	Stock of liquid assets
Combined Liquidity Score		ba1		ba1		
Financial Profile				baa1		
Business Diversification				0		
Opacity and Complexity				0		
Corporate Behavior				0		
Total Qualitative Adjustments				0		
Sovereign or Affiliate constraint:				Aaa		
Scorecard Calculated BCA range				a3 - baa2		
Assigned BCA				baa1		
Affiliate Support notching				0		
Adjusted BCA				baa1		

Balance Sheet	**in-scope (NOK million)**	**% in-scope**	**at-failure (NOK million)**	**% at-failure**
Other liabilities	80,857	33.9%	91,713	38.5%
Deposits	106,433	44.6%	95,577	40.1%
Preferred deposits	78,760	33.0%	74,822	31.4%
Junior Deposits	27,673	11.6%	20,754	8.7%
Senior unsecured bank debt	40,716	17.1%	40,716	17.1%
Dated subordinated bank debt	2,300	1.0%	2,300	1.0%
Preference shares (bank)	948	0.4%	948	0.4%
Equity	7,152	3.0%	7,152	3.0%
Total Tangible Banking Assets	238,406	100%	238,406	100%

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Debt class	De Jure waterfall		De Facto waterfall		Notching		LGF Notching Guidance vs. Adjusted BCA	Assigned LGF notching	Additional notching	Preliminary Rating Assessment
	Instrument volume + subordination	Sub-ordination	Instrument volume + subordination	Sub-ordination	De Jure	De Facto				
Counterparty Risk Rating	30.1%	30.1%	30.1%	30.1%	3	3	3	3	0	a1
Counterparty Risk Assessment	30.1%	30.1%	30.1%	30.1%	3	3	3	3	0	a1 (cr)
Deposits	30.1%	4.4%	30.1%	21.4%	2	3	2	2	0	a2
Senior unsecured bank debt	30.1%	4.4%	21.4%	4.4%	2	2	2	2	0	a2
Dated subordinated bank debt	4.4%	3.4%	4.4%	3.4%	-1	-1	-1	-1	0	baa2 (hyb)
Junior subordinated bank debt	3.4%	3.4%	3.4%	3.4%	-1	-1	-1	-1	-1	baa3

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

[1] Where dashes are shown for a particular factor (or sub-factor), the score is based on non-public information.
Source: Moody's Financial Metrics

Ratings

Exhibit 7

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

Source: Moody's Investors Service

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