MOODY'S
INVESTORS SERVICE

CREDIT OPINION

25 April 2019

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.

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SpareBank 1 SR-Bank ASA

Update to credit analysis

Summary

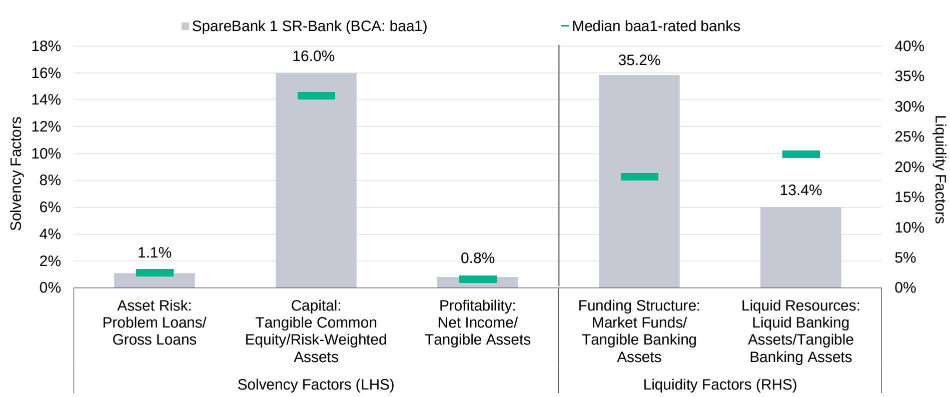
SpareBank 1 SR-Bank's long-term deposit and senior unsecured debt ratings of A1 take into account the bank's baseline credit assessment (BCA) of baa1, but also our loss given failure (LGF) analysis and government support assumptions which, together, result in three notches of rating uplift from its BCA.

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-December 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 some credit-risk concentrations in more volatile sectors, such as oil/offshore and commercial real estate. Nonetheless, the bank maintains a sound overall asset quality with stage 3 loans to gross loans ratio (including financial commitments and loans sold to SpareBank1 Boligkreditt and SpareBank 1 Næringskreditt) of around 1.5% at end-December 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 the currently improving operating environment in Norway. 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 that leaves them vulnerable to changes in investor sentiment.

Exhibit 1

Rating Scorecard - Key financial ratios



Source: Moody's Financial Metrics

Credit strengths

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

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

» Profitability supported by strong loan growth and lower credit losses

» A robust liquidity position ensures a survival period of up to 20 months

Credit challenges

» Exposures to the volatile oil-related and commercial real estate sectors pose risks to asset quality in a potential downturn

» Geographical concentration in certain regions elevates the bank's credit profile, although the bank aims to expand further in Southern Norway

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

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 non-preferred senior (NPS) debt that the bank is likely to raise by 2022.

Key indicators

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

	12-18[2]	12-17[2]	12-16[2]	12-15[2]	12-14[2]	CAGR/Avg.[3]
Total Assets (NOK billion)	243	231	218	221	208	4.0[4]
Total Assets (EUR million)	24,585	23,540	24,023	22,959	22,904	1.8[4]
Total Assets (USD million)	28,104	28,266	25,338	24,940	27,715	0.3[4]
Tangible Common Equity (NOK billion)	21	20	18	17	15	8.0[4]
Tangible Common Equity (EUR million)	2,109	1,996	1,999	1,736	1,689	5.7[4]
Tangible Common Equity (USD million)	2,411	2,396	2,108	1,886	2,044	4.2[4]
Problem Loans / Gross Loans (%)	1.1	1.1	1.2	0.8	0.5	0.9[5]
Tangible Common Equity / Risk Weighted Assets (%)	16.0	16.3	15.6	14.0	12.7	14.9[6]
Problem Loans / (Tangible Common Equity + Loan Loss Reserve) (%)	9.6	10.1	11.4	8.0	5.9	9.0[5]
Net Interest Margin (%)	1.5	1.5	1.5	1.5	1.7	1.6[5]
PPI / Average RWA (%)	2.3	2.3	2.1	1.6	1.9	2.0[6]
Net Income / Tangible Assets (%)	0.8	0.9	0.7	0.7	0.9	0.8[5]
Cost / Income Ratio (%)	43.6	44.1	45.0	51.3	48.4	46.5[5]
Market Funds / Tangible Banking Assets (%)	35.2	36.4	38.1	40.6	42.9	38.6[5]
Liquid Banking Assets / Tangible Banking Assets (%)	13.4	14.9	12.4	10.8	9.6	12.2[5]
Gross Loans / Due to Customers (%)	203.8	196.2	212.2	205.6	214.1	206.4[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 31 December 2018, its adjusted consolidated total assets (including loans transferred to the covered bond companies of the SpareBank 1 Alliance) totalled NOK243 billion.

Detailed credit considerations

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

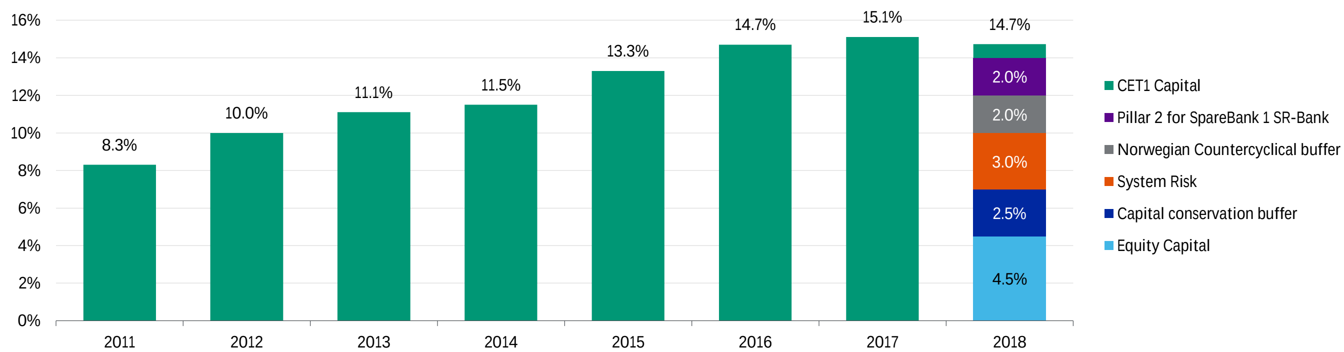
SpareBank 1 SR-Bank's operating environment is purely domestic and its Macro Profile is thus aligned with that of Norway, at Very Strong-. Norwegian banks benefit from operating in a wealthy and developed country with very high economic, institutional and government financial strength as well as very 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-December 2018 down from 15.1% at end-December 2017 (see Exhibit 3), but above the regulatory requirement of 14%. We note that the FSA has assigned a revised Pillar 2 requirement of 1.7% to the bank applicable from 31 March 2019, from 2% previously. Accordingly, the bank's CET1 target was also revised to 14.6% for 2019, from 15% previously, including a management buffer of 0.9% above the regulatory requirement (13.7%). We also note that the countercyclical buffer will increase to 2.5% at the end of 2019, from 2% currently, which means that the bank will likely aim for a higher CET1 in 2020.

SpareBank 1 SR-Bank has managed to accumulate capital through increased profitability in the last few years, through conservative growth and modest dividend payout (dividend policy of around 50% of annual profit). Consequently, we believe that the bank is well positioned and capitalised to continue developing its leading position in South-Western Norway, and expand further in the Oslo region based on its strategic direction.

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 also been supported by good earnings generation and retained earnings, while the bank's Tier 1 capital ratio was 15.9% and the total capital adequacy ratio was 17.6% at end-December 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.

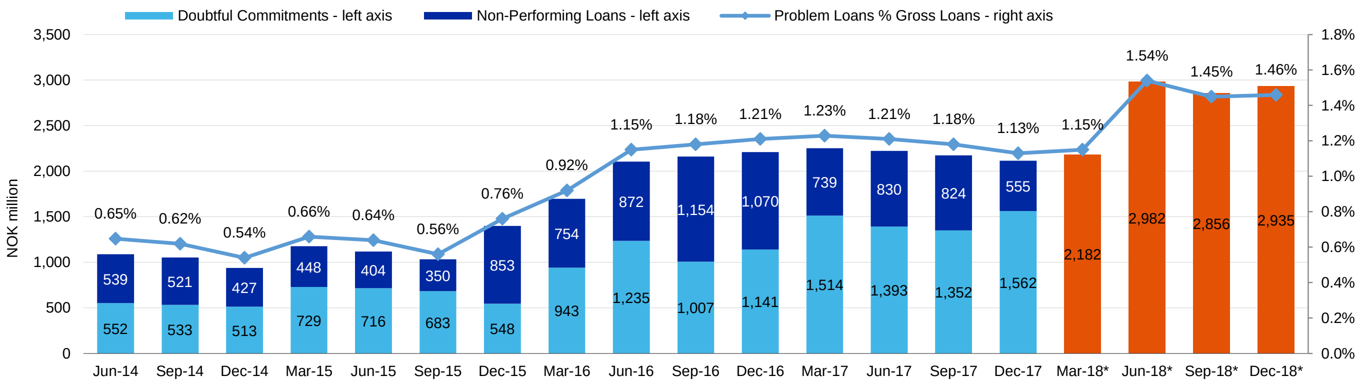
However, we expect that this Basel I floor will likely be removed in Norway in the second half of 2019, combined with an introduction of a discount for SME exposures based on EU's CRD IV directive, for which the bank estimates will have a positive effect of around 130 basis points on its CET1 ratio. Moreover, the bank's leverage ratio was satisfactory at 7.7% at end-December 2018, up from 7.4% a year earlier, significantly higher than both international and Norwegian requirements.

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 later this year as mentioned above, is expected to partly neutralise the bank's capital impact from a potential SIFI regulation.

Exposures to the volatile oil-related and commercial real estate sectors pose risks to asset quality in a potential downturn,...

We consider the SpareBank 1 SR-Bank's asset quality to be satisfactory, despite some deterioration in 2018 (see Exhibit 4) mainly due to the implementation of IFRS 9 in Norway and some challenges in the off-shore industry. Problem loans (or stage 3 loans classified under IFRS 9) accounted for 1.46% of gross loans (including covered bond loans) at end-December 2018, up from 1.13% for non-performing and impaired loans at end-December 2017. We note that the increase and the bulk of the bank's loan losses are largely affected by its exposure/commitments to the offshore/oil and gas sector. The Norwegian Petroleum Directorate expects an increase of 10% in oil investments in 2019 up from around 2% in 2018, which drives the improved economic activity in the region and further reduce the bank's asset risk.

Exhibit 4
SpareBank 1 SR-Bank's problem loans



*Note: 2018 numbers are Stage 3 gross loans under IFRS 9, while previous years are under IAS 39.
Source: Company reports and presentations, Moody's Investors Service

SpareBank 1 SR-Bank is one of Norwegian banks with a relatively high exposure to the oil & gas and shipping sectors, with related exposures (including oil services, oil and gas, and offshore shipping) at end-December 2018 comprising in total around 5.7% of its total gross loan book (including covered bond loans transferred to SpareBank 1 entities). However, the recent pick-up in oil prices is likely to contain the potential credit losses in these sectors, although we note that the bulk of the accumulated credit losses so far are linked to such exposures.

...while geographical concentration in certain regions elevates the bank's credit profile, although the bank aims to expand further in Southern Norway

In addition, the bank is also exposed to the commercial real estate sector (around 15.9% of gross loans at end-December 2018, including covered bond loans transferred to SpareBank 1 entities), a significant part of which is located in the county of Rogaland, where vacancy rates are vulnerable to oil prices and investments. This exposure combined with its sizeable mortgage loan book (around 60% of total gross loans), 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%, which means that the bank can withstand certain decline house prices before its credit profile is impacted.

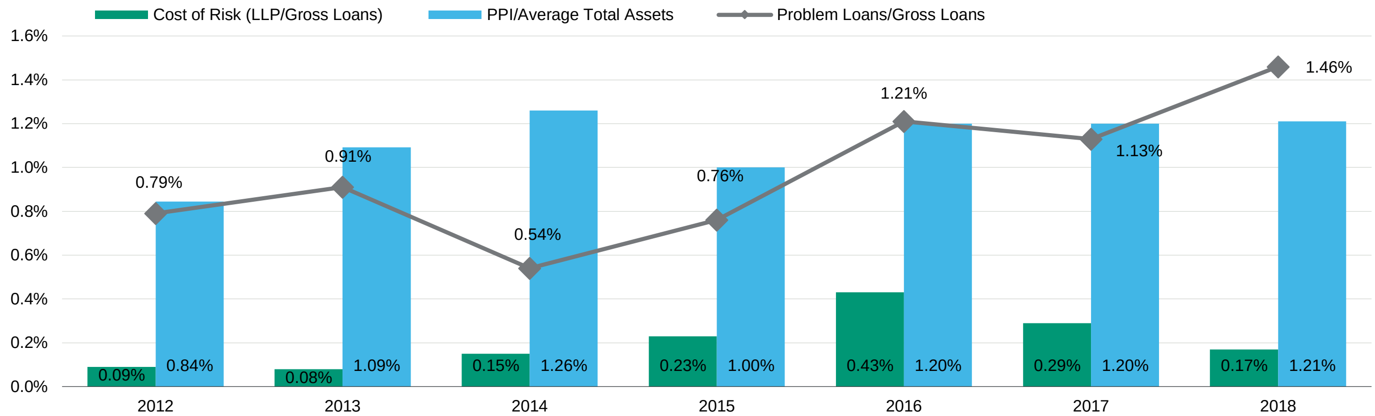
Our assigned Asset Risk Score reflects the challenges the bank could face in a possible distress in the oil-sector (similar to the one that unfolded in 2015-2016), taking into account the bank's relatively limited geographical diversification, certain concentration to vulnerable sectors, but also certain restructured loans that could bring about additional impairments. That said, we view positively the bank's recent opening of a branch in Oslo, aiming predominantly corporate clients, as part of its Southern Norway expansion strategy that will gradually improve its regional and sectoral diversification.

Profitability supported by strong loan growth and lower credit losses

SpareBank 1 SR-Bank's profitability in 2018 was supported by increased net interest income (9% during 2018) on the back of a robust loan growth of around 7.6% (including covered bond loans transferred to SpareBank 1 entities), cost containment, and lower loan losses. This has resulted in an increase in the bank's net profit by approximately 10% during 2018, with a return on equity (RoE) of 11.3% in 2018 from 11% in 2017 and compared to a long-term target of 12%.

The bank's loan losses decreased significantly in 2018 to NOK324 million compared to NOK543 million the previous year, reflecting the increasing optimism in the bank's home region due to higher oil prices. Accordingly, the bank's credit loss ratio declined to 0.17% in 2018 from 0.29% in 2017, despite the adoption of IFRS 9 with more conservative principles for write-downs from January 2018 onwards. We expect the bank's loan loss provisions to remain moderate and manageable for the bank in 2019, in view of the expected sustainability of oil prices.

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



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

The bank's net interest margin (NIM) was marginally higher at 1.54% in 2018 from 1.52% in 2017 as interest rates started to increase in Norway, while net commission income declined by 5.7% during 2018 due to lower commissions from the SpareBank 1 covered bond entities that the bank uses less than in the past. This commission income provides some diversification in the bank's total revenues, constituting around 26% of the total income in 2018. SR-Bank's cost efficiency remained favourable with one of the lowest cost-to-income ratios (40.9% in 2018 from 40.7% in 2017) among the large Norwegian Savings Banks. We note that the bank has ambitious plans in new technology and development in order to improve its product offering and customer experience, which to some degree exerts upward pressure on its IT-related expenses that are the second highest cost item after staff expenses.

Looking ahead, we expect the bank's pre-provision earnings to remain resilient in the next 12-18 months in view of the expected continued upturn in the Norwegian economy in 2019 that will support consumer consumption and increased business investments. We expect the bank to be able to meet its RoE target of 11.5% for 2019, in anticipation of also higher interest rates in 2019 that will likely support the bank's NIM. 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, and that its earnings quality and diversification is limited and skewed towards retail mortgages.

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 around 35% of tangible banking assets (including assets transferred to covered bond companies) at end-December 2018 (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 45% of total liabilities (including covered bonds issued through SpareBank 1 Boligkreditt and SpareBank 1 Næringskreditt) at end-December 2018, which has proven to be resilient and stable over many years. Deposits from customers increased by around 4% during 2018. Nonetheless, the bank's gross loans-to-deposits ratio, including transferred loans, was relatively high at around 203% at end-December 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.

At end-December 2018, the bank had transferred around NOK 8.9 billion to Sparebank 1 Boligkreditt and NOK0.4 billion to SpareBank 1 Næringskreditt, or around 5% 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.

...although a robust liquidity position ensures survival period of up to 20 months

A mitigating factor to the bank's reliance on market funds is its robust liquidity buffer, which stood at NOK30.4 billion or around 13% of total assets at end-December 2018 consisting mainly of cash, short-term repos, and covered bonds. This liquidity buffer could cover the bank's normal operations for at least 20 months, in the event of closed markets that would not allow the bank to refinance its maturing debt. In addition to the liquidity buffer, the bank has NOK24.4 billion in home mortgages ready to be transferred to a covered bond company, while it reported a commendable liquidity coverage ratio (LCR) of 167% at end-December 2018, combined with a net stable funding ratio (NSFR) of 121%.

However, our assigned Liquid Resources Score for the bank no longer incorporates a positive adjustment to reflect liquid assets held by the jointly-owned SpareBank 1 Boligkreditt and SpareBank 1 Næringskreditt, given the increasingly lower proportion of covered bonds channeled to these entities. The bank has now the bulk of its covered bonds carried out from its own covered bond entities, which are consolidated in its group financial statements.

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 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.

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	1.1%	aa2	←→	a3	Geographical concentration	Sector concentration
Capital						
TCE / RWA	16.0%	aa2	←→	aa2		
Profitability						
Net Income / Tangible Assets	0.8%	baa1	←→	baa2	Earnings quality	
Combined Solvency Score		aa3		a2		
Liquidity						
Funding Structure						
Market Funds / Tangible Banking Assets	35.2%	ba2	←→	ba2	Market funding quality	
Liquid Resources						
Liquid Banking Assets / Tangible Banking Assets	13.4%	baa3	←→	baa3	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	89,258	36.7%	99,414	40.9%
Deposits	99,570	40.9%	89,414	36.8%
Preferred deposits	73,682	30.3%	69,998	28.8%
Junior Deposits	25,888	10.6%	19,416	8.0%
Senior unsecured bank debt	43,662	17.9%	43,662	17.9%
Dated subordinated bank debt	2,122	0.9%	2,122	0.9%
Preference shares (bank)	1,350	0.6%	1,350	0.6%
Equity	7,298	3.0%	7,298	3.0%
Total Tangible Banking Assets	243,260	100%	243,260	100%

Debt class	De Jure waterfall		De Facto waterfall		Notching		LGF Notching Guidance vs. Adjusted BCA	Assigned LGF notching	Additional notching	Preliminary Rating Assessment
	Instrument volume + subordination	Sub-ordination	Instrument volume + subordination	Sub-ordination	De Jure	De Facto				
Counterparty Risk Rating	30.4%	30.4%	30.4%	30.4%	3	3	3	3	0	a1
Counterparty Risk Assessment	30.4%	30.4%	30.4%	30.4%	3	3	3	3	0	a1 (cr)
Deposits	30.4%	4.4%	30.4%	22.4%	2	3	2	2	0	a2
Senior unsecured bank debt	30.4%	4.4%	22.4%	4.4%	2	2	2	2	0	a2
Dated subordinated bank debt	4.4%	3.6%	4.4%	3.6%	-1	-1	-1	-1	0	baa2 (hyb)
Junior subordinated bank debt	3.6%	3.6%	3.6%	3.6%	-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	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 (hyb)
Jr Subordinate MTN	(P)Baa3

Source: Moody's Investors Service

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CLIENT SERVICES

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