MOODY'S
INVESTORS SERVICE

CREDIT OPINION
13 December 2018

Update

Rate this Research

RATINGS

Sparebanken Sor

Domicile	Kristiansand, 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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Sparebanken Sor

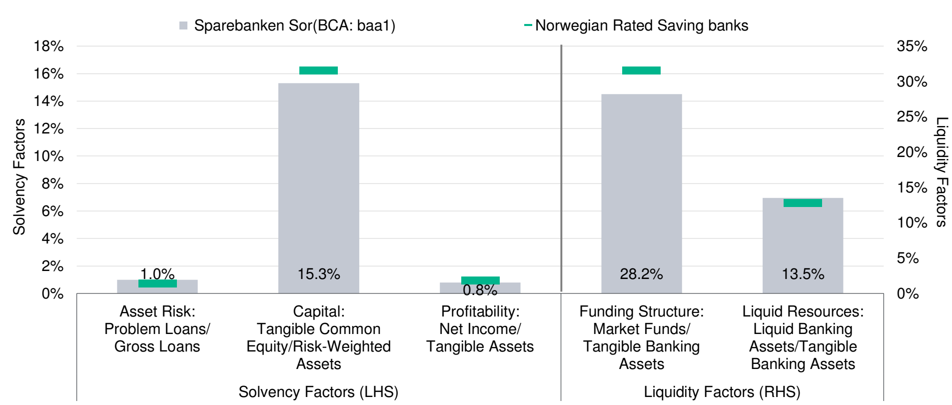
Update to credit analysis

Summary

Sparebanken Sor's baa1 BCA reflects its strong asset quality metrics, with ratios of non-performing loans (NPLs) to gross loans of 0.85% and Loan Loss Reserves (LLRs) to NPLs of 58.7% as of September 2018. The bank's baa1 BCA also captures the slight decrease in Sparebanken Sor's capital buffers which reached 15.0% as of September 2018 from 15.1% in year end 2017. Finally the bank's baa1 BCA incorporates its moderate profitability with a 0.8% return on assets and its high reliance on market funding, a common attribute of Norwegian banks, with market funds adjusted to exclude 50% of covered bonds accounting for 29.5% of tangible assets as of September 2018.

The bank's A1 deposit and issuer ratings take into account our Loss Given Failure (LGF) analysis of the bank's liability structure. Sparebanken Sor benefits from a large volume of deposits and substantial layers of subordination, resulting in very low LGF and providing two notches of rating uplift from its BCA. In addition, the bank's A1 rating also incorporates one notch of rating uplift due to government support, although this is likely to be revised downwards following the implementation of BRRD in Norway (please see press release for more details).

Exhibit 1
Rating Scorecard- Key Financial Ratios



Note: Average of other Moody's rated Norwegian savings banks is based on latest available financial data
Source: Moody's Banking Financial Metrics

Credit strengths

» Sparebanken Sor's BCA is supported by its Very Strong - Macro Profile

» Improved capital levels driven by higher regulatory targets

» Sparebanken Sor's asset quality metrics have been resilient and broadly in line with domestic peers

» Large volume of deposits and debt result in a two notch uplift to the deposits and issuer ratings

Credit challenges

» Despite resilient loan book performance, high single borrower and sector loan concentration increases asset risk

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

» Profitability is supported by efficient operations, though pressure in the bank's core earnings could persist

Rating outlook

The 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 for all large savings banks, including Sparebanken Sor. However, a potential change in our LGF outcome due to the MREL requirement coming up in 2019 could counterbalance the negative rating pressure from the government support.

Factors that could lead to an upgrade

» Over time, upward pressure could develop if the bank demonstrates a combination of: (1) reduced exposure to more volatile sectors such as construction and real estate sectors; (2) sustained strong asset quality and (3) a strengthening in core earnings generation.

Factors that could lead to a downgrade

» Downward rating pressure would develop on Sparebanken Sor's ratings if: (1) the bank's NPLs were to be expected to increase substantially, above our system-wide expectation of approximately 2%; (2) its profitability were to deteriorate materially from its current level and/or (3) the macroeconomic environment weakens meaningfully. Also, any change in the liability structure of the bank that would cause a reduction in the rating uplift under Moody's LGF analysis or, similarly, a revision of the government support assumptions, could lead to downward rating pressure.

Key indicators

Exhibit 2

Sparebanken Sor (Consolidated Financials) [1]

	9-18[2]	12-17[2]	12-16[2]	12-15[2]	12-14[2]	CAGR/Avg.[3]
Total Assets (NOK billion)	122	114	105	101	94	7.1[4]
Total Assets (EUR million)	12,867	11,638	11,615	10,539	10,368	5.9[4]
Total Assets (USD million)	14,945	13,975	12,251	11,448	12,546	4.8[4]
Tangible Common Equity (NOK billion)	11	10	9.2	7.7	7.1	11.0[4]
Tangible Common Equity (EUR million)	1,117	1,020	1,014	805	787	9.8[4]
Tangible Common Equity (USD million)	1,297	1,225	1,069	874	952	8.6[4]
Problem Loans / Gross Loans (%)	0.9	0.9	1.0	1.4	2.0	1.2[5]
Tangible Common Equity / Risk Weighted Assets (%)	15.3	15.3	14.8	12.8	13.2	14.3[6]
Problem Loans / (Tangible Common Equity + Loan Loss Reserve) (%)	7.9	8.4	9.3	14.3	21.0	12.2[5]
Net Interest Margin (%)	1.4	1.5	1.5	1.6	1.8	1.5[5]
PPI / Average RWA (%)	1.8	1.9	2.0	1.7	2.3	1.9[6]
Net Income / Tangible Assets (%)	0.8	0.8	0.9	0.6	0.7	0.8[5]
Cost / Income Ratio (%)	40.8	39.5	40.1	45.9	43.0	41.8[5]
Market Funds / Tangible Banking Assets (%)	29.5	28.2	28.2	31.5	30.1	29.5[5]
Liquid Banking Assets / Tangible Banking Assets (%)	15.4	13.5	12.6	11.4	12.3	13.1[5]
Gross Loans / Due to Customers (%)	181.3	176.5	177.5	184.3	169.2	177.8[5]

[1] All figures and ratios are adjusted using Moody's standard adjustments. [2] Basel II; 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 II periods presented.

Source: Moody's Financial Metrics

Profile

Sparebanken Sør is a regional Norwegian bank, which provides retail and corporate banking services to individuals, companies and public authorities in the counties of Vest-Agder, Aust-Agder, Telemark and Rogaland. Its products include financing, savings facilities, placements, insurance, pensions and payment facilities. Sparebanken Sør is currently the sixth largest savings bank in Norway with total consolidated assets of NOK121.7 billion (€12.9 billion), as of 30 September 2018.

Detailed credit considerations

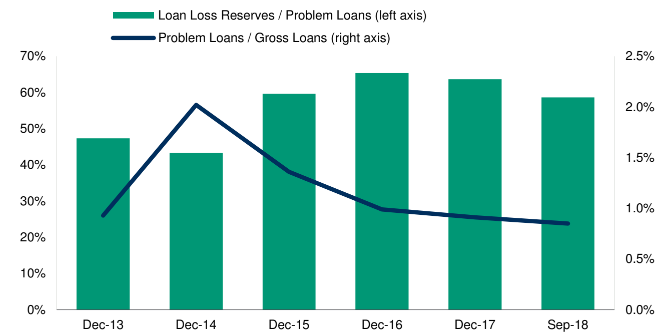
Sparebanken Sor's BCA is supported by its Very Strong- Macro Profile

Sparebanken Sor's operations are entirely in Norway. As a result we apply the Very Strong- Macro Profile we have assigned to banks operating in Norway. 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 system stem from a high level of household indebtedness, elevated real estate prices and domestic banks' reliance on market funding. However, these risks are mitigated by the strength of households' ability to service debt, banks' adequate capitalisation and the relatively small size of the banking system compared to the total size of the economy.

Resilient asset quality with problem loans metrics in line with domestic peers, although concentrations elevate asset risk

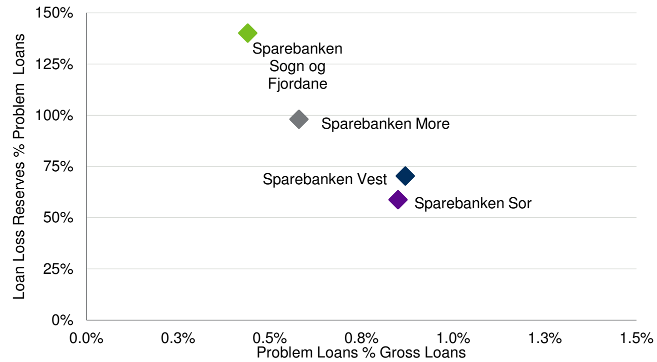
Sparebanken Sor's problem loan ratio (impaired and doubtful loans as a percentage of total loans) of 0.85% as of September 2018 (0.91% as of December 2017) compares well with other large savings banks and is broadly in line with the Norwegian average. Following the merger between Sparebanken Pluss and Sparebanken Sor in 2013, the new merged bank took several actions to improve its credit quality and limit future losses. The bank carried out a comprehensive review of its corporate portfolio in 2014 which resulted in individual write-downs of loans and a spike in credit costs to 0.37% of average gross loans in FY2014 from 0.08% in FY2013. However, Sparebanken Sor's credit costs normalised to 0.11% of average gross loans for FY2015 and declined further to 0.06% for FY2016, and 0.02% for FY2017. Sor's NPLs coverage of 58.7% as of September 2018 is broadly in line with peers.

Exhibit 3
Sparebanken Sor's Asset Quality metrics have been resilient



Source: Moody's Financial Metrics, Sparebanken Sor

Exhibit 4
..and in line with similarly rated domestic peers



Note: Data as of September 2018
Source: Moody's Financial Metrics

Sparebanken Sor's loan book is dominated by retail loans, mostly in the form of mortgages, which represent around 65% of the gross loan book as of September 2018, an asset class that has been more resilient historically. However, Sparebanken Sor's significant concentration to the real-estate and construction sectors poses downside risks to future loan book performance. Furthermore, the bank's business book exposes significant single-borrower concentrations making the bank vulnerable to a potential default of one of its large customers. Our adjustment to the bank's asset risk score by four notches to a3 captures these concentration risks.

Profitability is supported by efficient operations, but competition will continue to pressure margins despite interest rate increases

Sparebanken Sor reported a 9% year-on-year increase in net profit and a 9% return on equity (after tax) in the nine months ending in September 2018, stable compared to the same period last year (9.7% full-year 2017). The growing net profit is supported by a positive development in net interest income, gains related to financial instruments, and low loan losses. Sparebanken Sor's profitability was also supported by its best-in-class cost-to-income ratio of 40.8% for the nine months of 2018 (40.7% for the nine months of 2017, 39.5% in full-year 2017)[1]

Sparebanken Sor relies on stable income from lending: net interest income represented 81% of net revenue in the nine months of 2018, in line with the same period last year. The bank reported a net interest income to average assets of 1.46% in the nine months of 2018, marginally down from 1.53% in the same period last year. Lending margins came under pressure in the nine months of 2018, reflecting an increase in the interbank interest rate (3 month NIBOR) and intense competition. Sparebanken Sor recently raised its rates on loans and deposits, in line with the central bank's increase of the key policy rate in September 2018. Although interest rate increases might ease of some of the pressure on the bank's margins in coming quarters, intense competition remains which will result on margins remaining roughly in current levels.

Improved capital levels driven by higher regulatory targets

Sparebanken Sor's capitalisation is sound relative to its risk profile with a CET1 ratio of 14.8% as of September 2018 (including share of partially owned companies). The bank's reported CET1 ratio is well above its regulatory minimum of 14.0%, including a 2.0% Pillar 2 requirement. The Pillar 2 requirement is effective as of 30 September 2018 and was revised downwards from the previous 2.1% by the Norwegian FSA. Sparebanken Sor's target is to achieve a CET1 ratio that is at least in line with comparable peers.

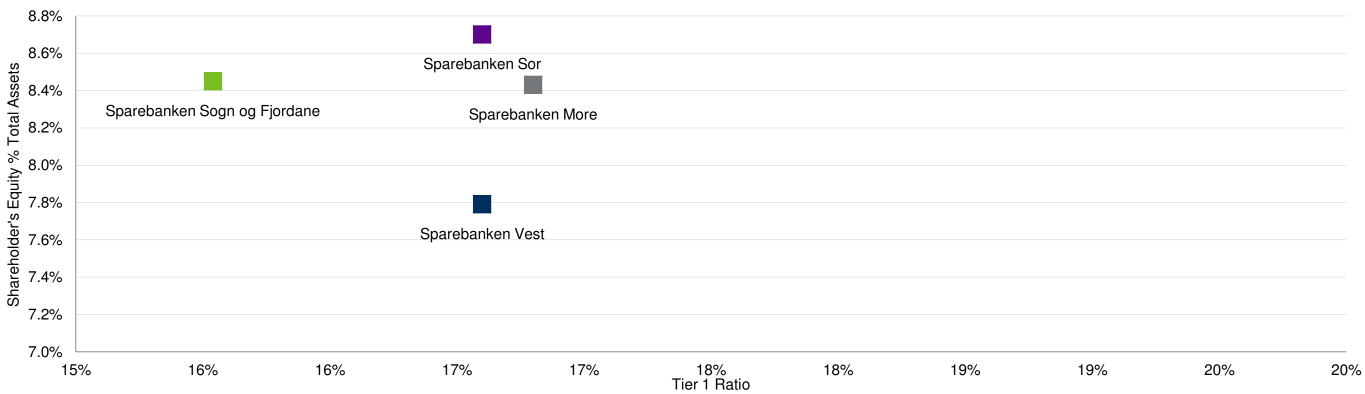
The bank has strengthened its CET1 capital mainly through earnings retention and limited growth in risk weighted assets. Sparebanken Sor's total regulatory capital ratio increased to 19.1% as of September 2018 compared to 18.1% as of September 2017. We note that the bank is the only one of the large regional banks in Norway that currently applies the standard method in its capital calculations. At the end of November 2017, Sparebanken Sor announced its intention to apply for approval to use the Internal Ratings-based (IRB) approach. The bank expects to send its application to the Norwegian FSA by the end of 2019.

Furthermore, 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, Sparebanken

Sor 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.

Exhibit 5

Capital levels have improved and compare favorably with peers



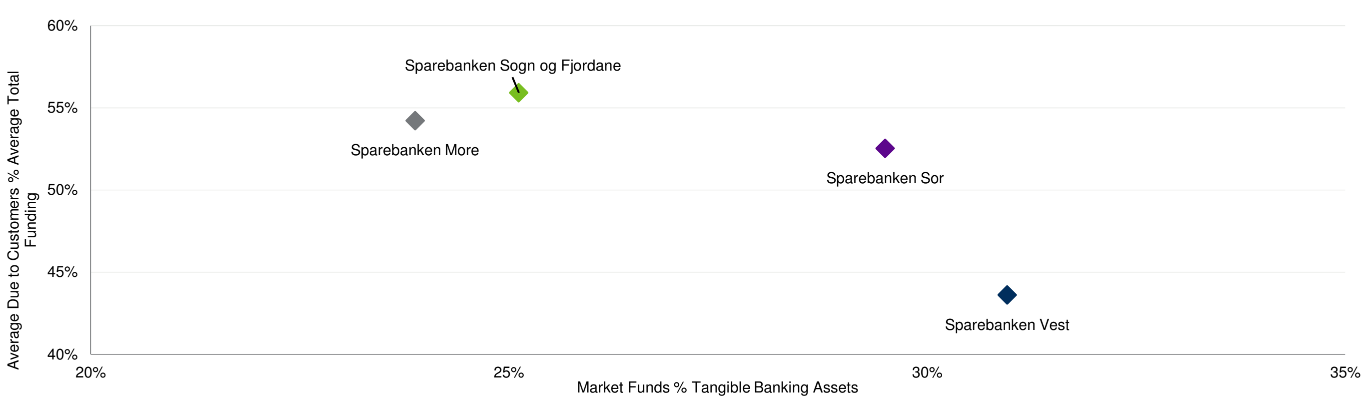
Note: Data as of September 2018, Sparebanken Sor and Sparebanken Sogn og Fjordane use the standardised method while Sparebanken More and Sparebanken Vest use the Internal Ratings Based Approach for their risk weighted assets and capital calculation.
Source: Moody's Financial Metrics, Sparebanken Sor

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

Sparebanken Sor's funding is underpinned by a strong deposit base, which was stable at 51% of non-equity funding as of September 2018. Nevertheless, the bank remains reliant on market funding, which accounted for 29.5% of tangible banking assets as of September 2018 (28.2% as of December 2017), and which renders the bank susceptible to changes in investor behaviour. While Sparebanken Sor has good access to the domestic capital markets, we expect that the bank will continue accessing the international markets in order to expand its investor base beyond the more limited and concentrated domestic market.

A sizeable and growing portion of market funds is in the form of covered bonds, which provide the bank with an additional source of funding. Based on our methodology, we reflect the stability of covered bonds relative to unsecured market funding through an adjustment to our market funds to tangible assets ratio. In 2016 Sparebanken Sor made its first international larger benchmark issuance through its fully owned covered bond company Sparebanken Sor Boligkreditt and the bank has carried out several successful issuances since then. We believe the bank will benefit from the depth of the markets, increasing its potential investor base and mitigating its refinancing risk. Our Funding Structure score reflects that the bank's overall funding profile remains a fundamental weakness for Sparebanken Sor relative to the other scorecard metrics.

Exhibit 6



Note: Data as of September 2018
Source: Moody's Financial Metrics

Sparebanken Sor also maintains sizeable buffers of high quality liquid assets. As of September 2018, liquid assets accounted for 15.4% of tangible assets (13.5% as of December 2017), in line with the Norwegian banking average, comprising cash and deposits with the central bank and the securities portfolio. The portfolio primarily includes Norwegian covered bonds, bonds from the government, other public entities and other issuers, and a limited amount of equity investments. We note that these holdings are mostly Norwegian securities, which could be a source of vulnerability from a concentration-risk perspective, but reduces the bank's currency exposure. The bank (group) reported a high Liquidity Coverage (LCR) ratio of 177% as of September 2018, well above the regulatory requirement and an increase compared to the 139% as of December 2017.

Support and structural considerations

Loss Given Failure

The EU's Bank Resolution and Recovery Directive (BRRD) enters into force as of 1 January 2019, thereby confirming our current assumptions regarding LGF 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 metrics are in line with our standard assumptions.

Under these assumptions, Sparebanken Sor's deposits and issuer ratings are likely to face very low loss-given-failure, due to the volume of the deposits and senior debt themselves and the amount of debt subordinated to them. This results in a Preliminary Rating Assessment (PRA) two notches above the BCA.

Government support

Sparebanken Sor is a regional savings bank with a sound market position on the southern coast of Norway, in the counties of Vest-Agder, Aust-Agder and Telemark, where we estimate it commands combined market shares of around 24% for lending and around 35% for deposits. Headquartered in Kristiansand, Norway, Sparebanken Sor is the sixth-largest savings bank in Norway with reported total assets of NOK122 billion as of September 2018 (NOK114 billion as of December 2017). Sparebanken Sor is the market leader in providing financial services to Christian organisations in Norway, largely as a result of its agreement with the Norwegian Christian Interest Organisation (KNIF).

We regard the probability of government support for Sparebanken Sor's debt and deposits as moderate, which results in one 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 Sparebanken Sor.

Counterparty Risk (CR) 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.

Sparebanken Sor's CR Assessment is positioned at Aa3(cr)/P-1(cr).

The CRA is positioned four notches above the 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 Rating (CRR)

CRRs are opinions of the ability of entities to honour the uncollateralised portion of non-debt counterparty financial liabilities (CRR liabilities) and also reflect the expected financial losses in the event such liabilities are not honoured. CRRs are distinct from ratings assigned to senior unsecured debt instruments and from issuer ratings because they reflect that, in a resolution, CRR liabilities might benefit from preferential treatment compared with senior unsecured debt. Examples of CRR liabilities include the uncollateralised portion of payables arising from derivatives transactions and the uncollateralised portion of liabilities under sale and repurchase agreements.

Sparebanken Sor's CRRs are positioned at Aa3/P-1.

The CRRs are positioned four notches above Sparebanken Sor's Adjusted BCA of baa1, reflecting extremely low loss-given-failure from the high volume of instruments that are subordinated to CRR liabilities, along with one notch of government support.

Foreign currency deposit rating

The bank's foreign-currency deposit ratings are unconstrained, because Norway has a country ceiling of Aaa. Sparebanken Sor's foreign-currency deposit rating is A1.

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 7

Sparebanken Sor

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	1.0%	aa2	↓	a3	Geographical concentration	
Capital						
TCE / RWA	15.3%	aa3	←→	a1	Risk-weighted capitalisation	
Profitability						
Net Income / Tangible Assets	0.8%	baa1	←→	baa2	Expected trend	
Combined Solvency Score		a1		a3		
Liquidity						
Funding Structure						
Market Funds / Tangible Banking Assets	28.2%	baa2	←→	baa2	Extent of market funding reliance	
Liquid Resources						
Liquid Banking Assets / Tangible Banking Assets	13.5%	baa3	←→	baa3	Stock of liquid assets	
Combined Liquidity Score		baa2		baa2		
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	40,434	33.2%	46,193	38.0%
Deposits	56,460	46.4%	50,701	41.7%
Preferred deposits	41,780	34.3%	39,691	32.6%
Junior Deposits	14,680	12.1%	11,010	9.0%
Senior unsecured bank debt	18,310	15.0%	18,310	15.0%
Dated subordinated bank debt	1,745	1.4%	1,745	1.4%
Preference shares (bank)	1,075	0.9%	1,075	0.9%
Equity	3,650	3.0%	3,650	3.0%
Total Tangible Banking Assets	121,674	100%	121,674	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	29.4%	29.4%	29.4%	29.4%	3	3	3	3	0	a1
Counterparty Risk Assessment	29.4%	29.4%	29.4%	29.4%	3	3	3	3	0	a1 (cr)
Deposits	29.4%	5.3%	29.4%	20.4%	2	3	2	2	0	a2
Senior unsecured bank debt	29.4%	5.3%	20.4%	5.3%	2	2	2	2	0	a2

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	(P)A1	A1

[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 8

Category	Moody's Rating
SPAREBANKEN SOR	
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

Source: Moody's Investors Service

Endnotes

1 This figure reflects Moody's standard adjustments. The bank's reported cost-to-income ratio for the nine months of 2018 was 39.6% (39.7% in the nine months of 2017 and 38.7% in full-year 2017).

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