

### **SAVINGS BANKS AMALGAMATION'S PILLAR III DISCLOSURE REPORT 2018**

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## SAVINGS BANKS AMALGAMATION'S PILLAR III DISCLOSURE REPORT 2018

The Amalgamation has republished Pillar III Disclosure report 2018 originally made public on 15 March 2019. This republished report contains more specific information on the main features of CET1 capital instruments. In addition some features of Tier 2 capital instruments have been corrected. As a result of corrections, amount of amalgamation's CET1 capital and own

funds are slightly lower (EUR 143 000) in comparison to what reported in the 2018 Pillar III Disclosure report as well as in the Annual Report 2018. Due to low level of impact, figures related to CET1 capital and own funds have not been corrected in the Amalgamation's Annual Report.

#### Introduction

The Amalgamation comprises the Savings Banks' Union Coop, which acts as the Central Institution of the Amalgamation, 23 Savings Banks, the Central Bank of Savings Banks Finland Plc, Sp Mortgage Bank, Sp- Fund Management Company Ltd Plc as well as the companies within the consolidation groups of the abovementioned entities. The structure of the Group differs from that of the Amalgamation so that the Savings Banks Group also includes organisations other than credit and financial institutions or service companies. The most significant of these are Sb Life Insurance Ltd and Sp-Koti Oy. More information on the group structure of is presented in the Savings Banks Group's Financial Statement.

This report discloses information on the capital adequacy, leverage ratio, asset encumbrance, and liquidity coverage ratio of the amalgamation as specified in Capital Requirements Regulation of the European Parliament and Council No. 573/2013 (CRR) (Pillar III disclosures). The Savings Banks Group's Financial Statement provides Pillar III disclosures to the extent that required Pillar III information is not included in this document. The note Reader's Manual provides an overview of the location of the required Pillar III disclosures either in this Pillar III Report or in the Savings Banks Group's Financial Statement.

The report is unaudited.

#### **Declaration Approved by the Board of Directors of Savings Banks Amalgamation**

According to section 435(1) of the Capital Requirements Regulation (CRR), Savings Banks Amalgamation must publish following documents:

- A declaration approved by its management body (the Board of Directors) on the adequacy of the risk management arrangements of the institution providing assurance that the risk management systems put in place are adequate with regard the institution's profile and strategy.
- A concise risk statement approved by its management body (the Board of Directors) succinctly describing the institution's overall risk profile associated with the business strategy. This statement shall include key ratios and figures providing external stakeholders with a comprehensive view of the institution's management of risk, including how the risk profile of the institution compares with the risk tolerance set by the management body.

## Board Declaration on the adequacy of the risk management arrangements

The Board of Directors approves the framework for risk appetite by setting risk limits and other thresholds for different risk areas at the Amalgamation level. The risk positions are regularly reported to the Board of Directors of the Central Institution. It is the Board of Director's assessment that the Amalgamation has adequate risk management arrangements in place with regard to the Amalgamation's risk profile and strategy.

#### Risk profile of Savings Banks Amalgamation

The basic objective of the Savings Banks to promote thrift and the financial well-being of their customer operating near their customers. Savings Banks practice retail banking. The Amalgamation conducts retail banking, mortgage banking, central credit institution services, administration of mutual funds and asset management. The key customer groups for Banking segment are private customers, corporate (small to medium) customers, forestry and agricultural customers.

The credit risk of the banking business is the most significant risk of the Amalgamation. In addition, the Amalgamation is affected

market risk, operational risk and other qualitative risks such as business risks. The Board of Directors of the Central Institution approves the most significant risk strategies and other operating principles.

The Board of Directors of the Central Institution steers the Banking segment's credit risk management by approving the credit risk strategy, other guidelines and by setting the risk limits and other thresholds for example on concentration risks and credit quality.

The most important market risk in banking activities is the interest rate risk in the banking book, which is measured through both net present value and net interest income. The market risk in the investment portfolio is measured and followed by investment class, counterparty and sector. The member credit institutions of the Amalgamation do not, as a rule, engage in trading for own or customers' account. The use of derivatives is limited to hedging purposes.

The key tools in monitoring liquidity risk at the Amalgamation level are cash position, liquidity reserve and LCR. At the end of 2018 the Amalgamation held 1,094 (1,284) million euros (before haircuts) of LCR eligible liquid assets. The Amalgamation's LCR was 158% (133) at the end of 2018. The Central Bank of Savings Banks has credit rating of A-/A-2 from S&P Global Ratings.

Operational risks are managed in all the entities of Amalgamation according to the principles of operational risk management approved by the Board of Directors of the Amalgamation's Central Institution. The principles determine the main operational risk control and risk management methods, which are used in evaluation of risks, monitoring of materialised risks and preparation for possible oncoming risks.

At the end of 2018, the CET1 capital ratio of the Savings Banks Amalgamation was 17.6% and the capital ratio was 18.2%. The capital structure of the Savings Banks Amalgamation is strong and it significantly exceeded the regulatory capital requirement, which was 11% of the total amount of risk-weighted exposures at the end of 2018. The Board of Directors of the Central institution has set a target level of CET1 capital. For the coming strategic period, the long-term target level of CET1 capital is 18%.

In Helsinki 14 August 2019

The Board of Directors' of the Savings Banks' Union Coop

Kalevi Hilli Chairman of the Board	<b>Toivo Alarautalahti</b> Vice Chairman of the Board	Pauli Aalto-Setälä
Pirkko Ahonen	Sanna Ahonen	Jari Oivo
Jaakko Ossa		 Marja-Leena Tuomola

#### **Pillar III Disclosure Principles**

The Amalgamation's Pillar III disclosure principles have been established in accordance with the effective legislation and authorities' regulations and also taking into account the Amalgamation's long term strategy and business plan. The objective of the Pillar III disclosure principles is to ensure that the amount and quality of the published information is adequate in relation to the nature, scale, complexity and risk level of the Amalgamation's business operations and taking into account the specific features of the Amalgamation's business operations. To achieve this objective, the Amalgamation assesses the materiality of the information from the stakeholder point of view and evaluates what can be classified as proprietary or confidential information. The Savings Banks

Amalgamation publishes all relevant information of the business and various risk areas, which are based on a selected business strategy.

The Amalgamation's Board of Directors approves the Pillar III disclosure principles and the Central Institution's management prepares the disclosure principles. The principles are updated at least annually or whenever the Amalgamation's operating environment, business model, regulatory and/or regulatory framework change materially. The Pillar III information is published annually in the separate Pillar III report. The Amalgamation assesses the need for more frequent publication if the market conditions, financial performance or change in the risk position would require that.

## NOTE 1: SUMMARY OF REGULATORY CAPITAL, RWA AND CAPITAL RATIOS

#### Capital adequacy's main items

Own Funds (EUR 1,000)	31.12.2018	31.12.2017
Common Equity Tier 1 (CET1) capital before regulatory adjustments	986 615	969 531
Total regulatory adjustments to Common Equity Tier 1 (CET1)	-38,524	-30,591
Common Equity Tier 1 (CET1) capital	948,092	938,939
Additional Tier 1 (AT1) capital before regulatory adjustments	0	0
Total regulatory adjustments to Additional Tier 1 (AT1) capital	0	0
Additional Tier 1 (AT1) capital	0	0
Tier 1 capital (T1 = CET1 + AT1)	948,092	938,939
Tier 2 (T2) capital before regulatory adjustments	29,736	45,483
Total regulatory adjustments to Tier 2 (T2) capital		
Tier 2 (T2) capital	29,736	45,483
Total capital (TC = T1 + T2)	977,827	984,422
Risk weighted assets	5,385,564	5,165,694
of which: credit and counterparty risk	4,815,965	4,601,921
of which: credit valuation adjustment (CVA)	72,423	72,541
of which: market risk	38,332	39,879
of which: operational risk	458,844	451,354
Common Equity Tier 1 (as a percentage of total risk exposure amount)	17.6%	18.2%
Tier 1 (as a percentage of total risk exposure amount)	17.6%	18.2%
Total capital (as a percentage of total risk exposure amount)	18.2%	19.1%
Capital requirement		
Total capital requirement	977,827	984,422
Capital requirement total*	593,940	569,379
of which: Pillar II additional capital requirement	26,928	25,828
Capital buffer	383,888	415,043

<sup>\*</sup>The capital requirement of 11% is formed by the statutory minimum capital adequacy requirement of 8%, the capital conservation buffer of 2.5% according to the Act on Credit Institutions, 0.5% Pillar II requirement set by the Financial Supervisory Authority and the country-specific countercyclical capital requirements of foreign exposures.

## NOTE 2: TRANSITIONAL OWN FUNDS DISCLOSURE TEMPLATE

31.12.2018	(EUR 1,000)		
EBA's Regulation numbering		(A) Amount at disclosure date	(B) Regulation (EU) No 575/2013 article reference
	Common Equity Tier 1 (CET1) capital: instruments and reserves		
1	Capital instruments and the related share premium accounts	54,681	26 (1), 27, 28, 29
	of which: Ordinary shares	20,195	EBA list 26 (3)
	of which: Primary capital	34,475	EBA list 26 (3)
	of which: Share premium accounts	10	
2	Retained earnings	680,685	26 (1) (c)
3	Accumulated other comprehensive income (and other reserves)	222,013	26 (1)
3a	Funds for general banking risk		26 (1) (f)
4	Amount of qualifying items referred to in Article 483 (3) and the related share premium accounts subject to phase out from CET1		486 (2)
5	Minority interests (amount allowed in consolidated CET1)		84,00
5a	Independently reviewed interim profits net of any foreseeable charge or dividend	27,385	26 (2)
6	Common Equity Tier 1 (CET1) capital bedore regulatory adjustments	984,764	
	Common Equity Tier 1 (CET1) capital: regulatory adjustments		
7	Additional value adjutments (negative amount)	-3,753	34, 105
8	Intangible assets (net of related tax liability) (negative amount)	-28,682	36 (1) (b), 37
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amounts)	-4,237	36 (1) (c), 38
11	Fair value reserves related to gains or losses on cash flow hedges		33 (a)
12	Negative amounts resulting from the calculation of expected loss amounts		36 (1) (d), 40, 159, 472 (6)
13	Any increase in equity that results from securitised assets (negative amount)		32 (1)
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing		33 (1) (b)
15	Defined-benefit pension fund assets (negative amount)		36 (1) (e), 41
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)		36 (1) (f), 42
17	Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		36 (1) (g), 44

18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	36 (1) (h), 43, 45, 46, 49 (2) (3), 79, 472 (10)
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	36 (1) (i), 43, 45, 47, 48 (1) (b), 49 (1) to (3), 79
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	36 (1) (c), 38, 48 (1) (a)
22	Amount exceeding the 15% threshold (negative amount)	48 (1)
23	of which: direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	36 (1) (i), 48 (1) (b)
24	Empty set in EU	
25	of which: deferred tax assets arising from temporary differences	36 (1) (c), 38, 48 (1) (a)
25a	Losses for the current financial year (negative amount)	36 (1) (l)
25b	Forseeable tax charges relating to CET1 items (negative amount)	36 (1) (j)
27	Qualifying AT1 deductions that exceeds the AT1 capital of the institution (negative amount)	36 (1) (j)
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-36,672
29	Common Equity Tier 1 (CET1) capital	048,092
	Additional Tier 1 (AT1) capital: instruments	
30	Capital instruments and the related share premium accounts	51, 52
31	of which: classified as equity under applicable accounting standards	
32	of which: classified as liabilities under applicable accounting standards	
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1	486 (3)
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued bu subsidiaries and held by third parties	85, 86
35	of which: instruments issued by subsidiaries subject to phase out	486 (3)
36	Additional Tier 1 (AT1) capital before regulatory adjustments	
	Additional Tier 1 (AT1) capital: ragulatory adjustments	
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)	52 (1) (b), 56 (a), 57
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	56 (b), 58
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	56 (c), 59, 60, 79

40	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		56 (d), 59, 79
41	Empty set in EU		
42	Qualifying T2 deductions that exceed the T2 capital of the institution (negative amount)		56 (e)
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital		
44	Additional Tier 1 (AT1) capital		
45	Tier 1 capital (T1 = CET1 + AT1)	948,092	
	Tier 2 (T2) capital: instruments and provisions		
46	Capital instruments and the related share premium accounts	29,736	62, 63
47	Amount of quolifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2		486 (4)
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties		87, 88
49	of which: instruments issued by subsidiaries subject to phase out		486 (4)
50	Credit risk adjustments		62 (c) & (d)
51	Tier 2 (T2) capital before regulatory adjustments	29,736	
	Tier 2 (T2) capital: regulatory adjustments		
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)		63 (b) (i), 66 (a), 67
53	Holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institutions designed to inflate artificially the own funds of the institution (negative amount)		66 (b), 68
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		66 (c), 69, 70, 79
55	Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)		66 (d), 69, 79
56	Empty set in EU		
57	Total regulatory adjustments to Tier 2 (T2) capital		
58	Tier 2 (T2) capital	29,736	
59	Total capital (TC = T1 + T2)	977,827	
60	Total risk weighted assets	5,385,564	
	Capital ratios and buffers		
61	Capital ratios and buffers  Common Equity Tier 1 (as a percentage of total risk exposure amount)	17,60	92 (2) (a)

63	Total capital (as a percentage of total risk exposure)	18,16	92 (2) (c)
64	Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements, plus systemic risk buffer, plus the systemically important institution buffer (G-SII or O-SII buffer), expressed as a percentage of risk exposure amount)	7,03	CRD 128, 129, 130, 131, 133
65	of which: capital conservation buffer requirement	2,50	
66	of which: countercyclical buffer requirement	0,03	
67	of which: systemic risk buffer requirement		
67a	of which: Global Systemically Important Institution(G-SII) or Other Systemically Important Institution (O-SII) buffer		
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	17,61	CRO 128
69	[non relevant in EU regulation]		
72	Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	16,958	36 (1) (h), 45, 46, 472 (10) 56 (c), 59, 60, 475 (4), 66 (c), 69, 70, 477 (4)
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	25,249	36 (1) (i), 45, 48, 470, 472 (11)
	Applicable caps on the inclusion of provisions in Tier 2		
74	Empty set in EU		
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)		62
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach		62
	Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2013 - 1 Jan 2022)		
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)		62
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach		62
80	Current cap on CET1 instruments subject to phase out arrangements		484 (3), 486 (2) & (5)
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)		484 (3), 486 (2) & (5)
82	Current cap on AT1 instruments subject to phase ous arrangements		484 (4), 486 (3) & (5)
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)		484 (4), 486 (3) & (5)
84	Current cap on T2 instruments subject to phase out arrangements		484 (5), 486 (4) & (5)
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)		484 (5), 486 (4) & (5)

31.12.2017	(EUR 1,000)			
EBA's Regulation numbering		(A) Amount at disclosure date	(B) Reculation (EU) No 575/2013 article reference	(C) Amounts subject to pre-regulation (EU) No 575/2013 treatment or prescribed residual amount of regulation (EU) 575/2013"
	Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	54,670	26 (1), 27, 28, 29, EBA list 26 (3)	
	of which: Ordinary shares	20,195	EBA list 26 (3)	
	of which: Primary capital	34,475	EBA list 26 (3)	
	of which: Share premium accounts			
2	Retained earnings	596,078	26 (1) (c)	
3	Accumulated other comprehensive income (and other reserves)	252,356	26 (1)	
3a	Funds for general banking risk		26 (1) (f)	
4	Amount of qualifying items referred to in Article 483 (3) and the related share premium accounts subject to phase out from CET1		486 (2)	
	Public sector capital injections grandfathered until 1 January 2018		483 (2)	
5	Minority interests (amount allowed in consolidated CET1)		84, 479, 480	
5a	Independently reviewed interim profits net of any foreseeable charge or dividend	63,820	26 (2)	
6	Common Equity Tier 1 (CET1) capital bedore regulatory adjustments	966,924		
	Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjutments (negative amount)	-2,867	34, 105	
8	Intangible assets (net of related tax liability) (negative amount)	-23,608	36 (1) (b), 37, 472 (4)	
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amounts)	-1,510	36 (1) (c), 38, 472 (5)	
11	Fair value reserves related to gains or losses on cash flow hedges		33 (a)	
12	Negative amounts resulting from the calculation of expected loss amounts		36 (1) (d), 40, 159, 472 (6)	
13	Any increase in equity that results from securitised assets (negative amount)		32 (1)	

14	Gains or losses on liabilities valued at fair value resulting from changes in own credit		
	standing		33 (1) (b) (c)
15	Defined-benefit pension fund assets (negative amount)		36 (1) (e), 41, 472 (7)
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)		36 (1) (f), 42, 472 (8)
17	Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		36 (1) (g), 44, 472 (9)
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		36 (1) (h), 43, 45, 46, 49 (2) (3), 79, 472 (10)
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		36 (1) (i), 43, 45, 47, 48 (1) (b), 49 (1) to (3), 79, 470, 472 (11)
21	Deferred tax assets arising from temporary differences (amount above 10 % threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)		36 (1) (c), 38, 48 (1) (a), 470, 472 (5)
22	Amount exceeding the 15% threshold (negative amount)		48 (1)
23	of which: direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities		36 (1) (i), 48 (1) (b), 470, 472 (11)
24	Empty set in EU		
26	Regulatory adjustments applied to Common Equity Tier 1 in respect of amounts subject to pre-CRR treatment		36 (1) (l)
26a	Regulatory adjustments relating to unrealised gains and losses pursuant to Articles 467 and 468		
	Of whichfilter for unrealised loss 1		467
	Of whichfilter for unrealised gain 1		468
26b	Amount to be deducted from or added to Common Equity Tier 1 capital with regard to additional filters and deductions required pre CRR		481
27	Qualifying AT1 deductions that exceeds the AT1 capital of the institution (negative amount)		36 (1) (j)
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-27,984	
29	Common Equity Tier 1 (CET1) capital	938,939	
	Additional Tier 1 (AT1) capital: instruments		
30	Capital instruments and the related share premium accounts		51, 52
31	of which: classified as equity under applicable accounting standards		
32	of which: classified as liabilities under applicable accounting standards		
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1		486 (3)
	Public sector capital injections grandfathered until 1 January 2018		483 (3)

34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued bu subsidiaries and held by third parties		85, 86, 480
35	of which: instruments issued by subsidiaries subject to phase out		486 (3)
36	Additional Tier 1 (AT1) capital before regulatory adjustments		
	Additional Tier 1 (AT1) capital: ragulatory adjustments		
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)		52 (1) (b), 56 (a), 57, 475 (2)
38	Holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		56 (b), 58, 475 (3)
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		56 (c), 59, 60, 79, 475 (4)
40	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		56 (d), 59, 79, 475 (4)
41	Regulatory adjustments applied to Additional Tier 1 capital in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase-out as prescribed in Regulation (EU) No 585/2013 (ie. CRR residual amounts)		
41a	Residual amounts deducted from Additional Tier 1 capital with regard to deduction from Common Equity Tier 1 capital during the transitional period pursuant to article 472 of Regulation (EU) No 575/2013		472, 473(3)(a), 472 (4), 472 (6), 472 (8) (a), 472 (9), 472 (10) (a), 472 (11) (a)
41b	Residual amounts deducted from Additional Tier 1 capital with regard to deduction from Tier 2 capital during the transitional period pursuant to article 475 of Regulation (EU) No 575/2013		477, 477 (3), 477 (4) (a)
41c	Amounts to be deducted from added to Additional Tier 1 capital with regard to additional filters and deductions required pre-CRR		467, 468, 481
42	Qualifying T2 deductions that exceed the T2 capital of the institution (negative amount)		56 (e)
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital		
44	Additional Tier 1 (AT1) capital		
45	Tier 1 capital (T1 = CET1 + AT1)	938,939	
	Tier 2 (T2) capital: instruments and provisions		
46	Capital instruments and the related share premium accounts	45,483	62, 63
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2		486 (4)
	Public sector capital injections grandfathered until 1 January 2018		483 (4)

48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties		87, 88, 480
49	of which: instruments issued by subsidiaries subject to phase out		486 (4)
50	Credit risk adjustments		62 (c) & (d)
51	Tier 2 (T2) capital before regulatory adjustments	45,483	
	Tier 2 (T2) capital: regulatory adjustments		
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)		63 (b) (i), 66 (a), 67, 477 (2)
53	Holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institutions designed to inflate artificially the own funds of the institution (negative amount)		66 (b), 68, 477 (3)
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of fi- nancial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		66 (c), 69, 70, 79, 477 (4)
54a	Of which new holdings not subject to transitional arrangements		
54b	Of which holdings existing before 1 January 2013 and subject to transitional arrangements		
55	Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)		66 (d), 69, 79, 477 (4)
56	Regulatory adjustments applied to Tier 2 in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR residual amounts)		
56a	Residual amounts deducted from Tier 2 capital with regard to deduction from Common Equity Tier 1 capital during the transitional period pursuant to article 472 of Regulation (EU) No 575/2013		472, 472(3)(a), 472 (4), 472 (6), 472 (8), 472 (9), 472 (10) (a), 472 (11) (a)
56b	Residual amounts deducted from Tier 2 capital with regard to deduction from Additional Tier 1 capital during the transitional period pursuant to article 475 of Regulation (EU) No 575/2013		475, 475 (2) (a), 475 (3), 475 (4) (a)
56c	Amounts to be deducted from or added to Tier 2 capital with regard to additional filters and deductions required pre-CRR		467, 468, 481
57	Total regulatory adjustments to Tier 2 (T2) capital		
58	Tier 2 (T2) capital	45,483	
59	Total capital (TC = T1 + T2)	984,422	

59a	Risk weighted assets in respect of amounts subject to pre-CRR treatment and transitional
	treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR
	residual amount)

residual amount)		
Total risk weighted assets	5,165,694	
Capital ratios and buffers		
Common Equity Tier 1 (as a percentage of total risk exposure amount)	18,18	92 (2) (a), 465
Tier 1 (as a percentage of total risk exposure amount)	18,18	92 (2) (b), 465
Total capital (as a percentage of total risk exposure)	19,06	92 (2) (c)
Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements, plus systemic risk buffer, plus the systemically important institution buffer (G-SII or O-SII buffer), expressed as a percentage of risk exposure amount)	7,00	CRD 128, 129, 130
of which: capital conservation buffer requirement	2,50	
of which: countercyclical buffer requirement	0,00	
Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	18,18	CRO 128
Capital ratios and buffers		
Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	24,031	36 (1) (h), 45, 46, 472 (10) 56 (c), 59, 60, 475 (4), 66 (c), 69, 70, 477 (4)
Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	25 249	36 (1) (1), 45, 48, 470, 472 (11)
Applicable caps on the inclusion of provisions in Tier 2		
Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)		62
Cap on inclusion of credit risk adjustments in T2 under standardised approach		62
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2013 - 1 Jan 2022)		
Current cap on CET1 instruments subject to phase out arrangements		484 (3), 486 (2) & (5)
Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)		484 (3), 486 (2) & (5)
Current cap on AT1 instruments subject to phase ous arrangements		484 (4), 486 (3) & (5)
Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)		484 (4), 486 (3) & (5)
Current cap on T2 instruments subject to phase out arrangements		484 (5), 486 (4) & (5)
Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)		484 (5), 486 (4) & (5)
	Capital ratios and buffers  Common Equity Tier 1 (as a percentage of total risk exposure amount)  Tier 1 (as a percentage of total risk exposure amount)  Total capital (as a percentage of total risk exposure amount)  Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements, plus systemic risk buffer, plus the systemically important institution buffer (G-SII or O-SII buffer), expressed as a percentage of risk exposure amount)  of which: capital conservation buffer requirement  Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)  Capital ratios and buffers  Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)  Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)  Applicable caps on the inclusion of provisions in Tier 2  Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)  Cap on inclusion of credit risk adjustments in T2 under standardised approach  Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2013 - 1 Jan 2022)  Current cap on CET1 instruments subject to phase out arrangements  Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)  Current cap on T2 instruments subject to phase out arrangements	Capital ratios and buffers Common Equity Tier 1 (as a percentage of total risk exposure amount)  Tier 1 (as a percentage of total risk exposure)  18,18 Total capital (as a percentage of total risk exposure)  Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements, plus systemic risk buffer, plus the systemically important institution buffer (G-SII or O-SII buffer), expressed as a percentage of risk exposure amount)  7,00 of which: capital conservation buffer requirement  2,50 of which: capital conservation buffer requirement  0,00  Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)  18,18  Capital ratios and buffers  Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)  Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)  25 249  Applicable caps on the inclusion of provisions in Tier 2  Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)  Cap on inclusion of credit risk adjustments in T2 under standardised approach  Capital instruments subject to phase-out arrangements  Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)  Current cap on AT1 instruments subject to phase out arrangements  Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)

# NOTE 3: ISSUED TIER 2 (T2) INSTRUMENTS RECOGNISED IN REGULATORY CAPITAL

The table below provides a list of issued Common equity Tier 1 (CET1) and Tier 2 (T2) instruments.

2018 (EUR 1,000)				Amount recognised in	Balance sheet	Instrument type
Issuer	ISIN	Interest rate	Maturity	regulatory capital	value	-7F-
Common Equity Tier 1 (CET1) capital instruments						
Aito Säästöpankki Oy				5,195	5,195	Ordinary share
Helmi Säästöpankki Oy				5,000	5,000	Ordinary share
Närpes Sparbank Oy				10,000	10,000	Ordinary share
Avain Säästöpankki				7,000	7,000	Primary capital
Kalannin Säästöpankki				2,000	2,000	Primary capital
Lammin Säästöpankki				7,350	7,350	Primary capital
Mietoisten Säästöpankki				1,000	1,000	Primary capital
Myrskylän Säästöpankki				5,000	5,000	Primary capital
Pyhärannan Säästöpankki				725	725	Primary capital
Suomenniemen Säästöpankki				4,000	4,000	Primary capital
Sysmän Säästöpankki				2,000	2,000	Primary capital
Säästöpankki Sinetti				5,400	5,400	Primary capital
Total				54,670	54,670	

2018 (EUR 1,000)				Amount	D.1	
Issuer	ISIN	Interest rate	Maturity	recognised in regulatory capital	Balance sheet value	Instrument type
Tier 2 (T2) capital instruments						
Aito Säästöpankki Oy	FI4000102686	2.500	12.11.19	1,384	8,000	Debenture
Aito Säästöpankki Oy	FI4000153903	2.000	25.8.20	1,651	5,000	Debenture
Aito Säästöpankki Oy	FI4000207030	1.500	23.8.21	2,645	5,000	Debenture
Avain Säästöpankki	FI4000099320	2.550	15.10.19	315	2,000	Debenture
Avain Säästöpankki	FI4000153622	2.250	15.10.20	716	2,000	Debenture
Avain Säästöpankki	FI4000201504	2.250	15.8.21	1,049	2,000	Debenture
Avain Säästöpankki	FI4000257449	2.100	15.10.22	1,516	2,000	Debenture
Eurajoen Säästöpankki	FI4000092606	3.000	2.6.19	81	5,513	Debenture
Eurajoen Säästöpankki	FI4000157169	2.600	30.11.20	1,374	3,584	Debenture
Helmi Säästöpankki Oy	FI4000157516	2.000	22.10.20	638	1,762	Debenture
Kalannin Säästöpankki	FI4000108584	2.500	24.11.19	539	3,000	Debenture
Liedon Säästöpankki	FI4000096896	2.500	26.8.19	288	2,211	Debenture
Liedon Säästöpankki	FI4000153630	2.000	18.8.20	585	1,791	Debenture
Liedon Säästöpankki	FI4000176474	2.000	17.2.21	1,446	3,390	Debenture
Liedon Säästöpankki	FI4000201645	2.000	18.8.21	1,234	2,344	Debenture
Liedon Säästöpankki	FI4000223946	2.000	21.2.22	2,285	3,634	Debenture
Liedon Säästöpankki	FI4000252200	2.000	22.8.22	1,051	1,443	Debenture
Myrskylän Säästöpankki	FI4000099353	3.000	26.9.19	244	1,655	Debenture
Myrskylän Säästöpankki	FI4000157482	2.100	26.10.20	296	812	Debenture
Myrskylän Säästöpankki	FI4000288394	2.000	1.2.23	1,139	1,393	Debenture
Nooa Säästöpankki Oy	FI4000090287	2.750	14.6.19	222	2,461	Debenture
Nooa Säästöpankki Oy	FI4000108477	1.745	10.12.19	248	1,319	Debenture
Nooa Säästöpankki Oy	FI4000108469	1.995	10.12.19	277	1,468	Debenture
Nooa Säästöpankki Oy	FI4000153523	1.250	4.8.20	455	1,428	Debenture
Nooa Säästöpankki Oy	FI4000170626	1.000	21.12.20	1,187	3,007	Debenture
Nooa Säästöpankki Oy	FI4000201520	1.000	20.7.21	731	1,433	Debenture
Nooa Säästöpankki Oy	FI4000220165	1.500	20.12.21	966	1,626	Debenture
Nooa Säästöpankki Oy	FI4000251988	1.500	18.7.22	502	708	Debenture
Nooa Säästöpankki Oy	FI4000282975	1.500	11.1.23	536	665	Debenture
Someron Säästöpankki	FI4000104823	1.500	14.11.19	270	1,553	Debenture
Ylihärmän Säästöpankki	FI4000099320	2.550	15.10.19	315	2,000	Debenture
Ylihärmän Säästöpankki	FI4000153622	2.250	15.10.20	895	2,500	Debenture
Ylihärmän Säästöpankki	FI4000257449	2.100	15.10.22	2,653	3,500	Debenture
-				29,736	82,200	

The table below provides a list of issued Tier 2 (T2) instruments

2017 (EUR 1,000)				Amount recognised in	Balance sheet	Instrument
Issuer	ISIN	Interest rate	Maturity	regulatory capital	value	type
Common Equity Tier 1 (CET1) capital instruments						
Aito Säästöpankki Oy				5,195	5,195	Ordinary share
Helmi Säästöpankki Oy				5,000	5,000	Ordinary share
Närpes Sparbank Oy				10,000	10,000	Ordinary share
Avain Säästöpankki				7,000	7,000	Primary capital
Kalannin Säästöpankki				2,000	2,000	Primary capital
Lammin Säästöpankki				7,350	7,350	Primary capital
Mietoisten Säästöpankki				1,000	1,000	Primary capital
Myrskylän Säästöpankki				5,000	5,000	Primary capital
Pyhärannan Säästöpankki				725	725	Primary capital
Suomenniemen Säästö- pankki				4,000	4,000	Primary capital
Sysmän Säästöpankki				2,000	2,000	Primary capital
Säästöpankki Sinetti				5,400	5,400	Primary capital
Total				54,670	54,670	

2017 (EUR 1,000)				Amount	Balance sheet	Instrument
Issuer	ISIN	Interest rate	Maturity	recognised in regulatory capital	value	type
Tier 2 (T2) capital instruments						
Aito Säästöpankki Oy	FI4000207030	1.500	23.8.21	3,645	5,000	Debenture
Aito Säästöpankki Oy	FI4000153903	2.000	25.8.20	2,651	5,000	Debenture
Aito Säästöpankki Oy	FI4000102686	2.500	12.11.19	2,984	8,000	Debenture
Avain Säästöpankki	FI4000257449	2.100	15.10.22	1,916	2,000	Debenture
Ylihärmän Säästöpankki	FI4000257449	2.100	15.10.22	3,352	3,500	Debenture
Avain Säästöpankki	FI4000153622	2.250	15.10.20	1,116	2,000	Debenture
Ylihärmän Säästöpankki	FI4000153622	2.250	15.10.20	1,395	2,500	Debenture
Avain Säästöpankki	FI4000201504	2.250	15.8.21	1,449	2,000	Debenture
Avain Säästöpankki	FI4000099320	2.550	15.10.19	715	2,000	Debenture
Ylihärmän Säästöpankki	FI4000099320	2.550	15.10.19	715	2,000	Debenture
Eurajoen Säästöpankki	FI4000157169	2.600	30.11.20	2,090	3,584	Debenture
Eurajoen Säästöpankki	FI4000092606	3.000	2.6.19	274	5,513	Debenture
Helmi Säästöpankki Oy	FI4000157516	2.000	22.10.20	990	1,762	Debenture
Huittisten Säästöpankki	FI4000071543	2.850	18.11.18	253	5,000	Debenture
Kalannin Säästöpankki	FI4000108584	2.500	24.11.19	1,139	3,000	Debenture
Liedon Säästöpankki	FI4000096896	2.500	26.8.19	730	2,211	Debenture
Liedon Säästöpankki	FI4000153630	2.000	18.8.20	943	1,791	Debenture
Liedon Säästöpankki	FI4000176474	2.000	17.2.21	2,124	3,390	Debenture
Liedon Säästöpankki	FI4000201645	2.000	18.8.21	1,702	2,344	Debenture
Liedon Säästöpankki	FI4000223946	2.000	21.2.22	3,011	3,634	Debenture
Liedon Säästöpankki	FI4000252200	2.000	22.8.22	1,339	1,443	Debenture
Myrskylän Säästöpankki	FI4000157482	2.100	26.10.20	458	812	Debenture
Myrskylän Säästöpankki	FI4000099353	3.000	26.9.19	575	1,655	Debenture
Myrskylän Säästöpankki	FI4000288394	2.000	1.2.23	1,393	1,393	Debenture
Nooa Säästöpankki Oy	FI4000220165	1.500	20.12.21	1,291	1,626	Debenture
Nooa Säästöpankki Oy	FI4000090287	2.750	14.6.19	714	2,461	Debenture
Nooa Säästöpankki Oy	FI4000108477	1.560	10.12.19	512	1,319	Debenture
Nooa Säästöpankki Oy	FI4000108469	1.810	10.12.19	570	1,468	Debenture
Nooa Säästöpankki Oy	FI4000153523	1.250	4.8.20	741	1,428	Debenture
Nooa Säästöpankki Oy	FI4000170626	1.000	21.12.20	1,788	3,007	Debenture
Nooa Säästöpankki Oy	FI4000201520	1.500	20.7.21	1,018	1,433	Debenture
Nooa Säästöpankki Oy	FI4000282975	1.500	11.1.23	665	665	Debenture
Nooa Säästöpankki Oy	FI4000251988	1.500	18.7.22	644	708	Debenture
Someron Säästöpankki	FI4000104823	1.500	14.11.19	581	1,553	Debenture
Total				45,483	87,200	

Commission	31.12.2018 (EUR 1.000)	4503AITD025019	4503AITD020020	4503AITD015021	4912AVAD0255019	4912AVAD022520	4912AVAD022521	4912AVAD021022	4450EURDVAIH19
implemen- ting regula- tion (EU) No 1423/2013	(2011,000)								
	Issuer	Aito Säästöpankki Oy	Aito Säästöpankki Oy	Aito Säästöpankki Oy	Avain Säästöpankki	Avain Säästöpankki	Avain Säästöpankki	Avain Säästöpankki	Eurajoen Säästöpankki
2	Unique identifier (ISIN)	FI4000102686	FI4000153903	FI4000207030	FI4000099320	FI4000153622	FI4000201504	FI4000257449	FI4000092606
3	Governing law(s) of the instrument	Finnish							
4	Transitional CRR rules	T2							
5	Post-transitional CRR rules	T2							
6	Eligible at solo/(sub-)consolidated/solo & (sub-) consolidated	Solo & Consolidated							
7	Instrument type (types to be specified by each jurisdiction)	(EU) No 575/2013 article 486 (4)							
8	Amount recognised in regulatory capital	1,384	1,651	2,645	315	716	1,049	1,516	81
9	Nominal amount of instrument	8,000	5,000	5,000	2,000	2,000	2,000	2,000	5,513
9a	Issue price	100	100	100	100	100	100	100	100
9b	Redemption price	100%	100%	100%	100%	100%	100%	100%	100%
10	Accounting classification	Liability - amortised cost							
11	Original date of issuance	12.8.14	25.5.15	23.5.16	23.6.14	11.5.15	2.5.16	8.5.17	2.6.14
12	Perpeptual or dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	12.11.19	25.8.20	23.8.21	15.10.19	15.10.20	15.8.21	15.10.22	2.6.19
14	Issuer call subject to prior supervisory approval	Yes							
15	Optional call date, contingent call dates, and redemption amount	N/A							
16	Subsequent call dates, if applicable	N/A							
17	Fixed or floating dividend/coupon	fixed	floating						
18	Coupon rate and any related index	2.50%	2.00%	1.50%	2.55%	2.25%	2.25%	2.10%	Floating Euribor 12-month + 2.0% (mini- mum rate 3.0%)
19	Existence of a dividend stopper	No							
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory							
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory							
21	Existence of step up or other incentive to redeem	No							
22	Noncumulative or cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	N/A							
25	If convertible, fully or partially	N/A							
26	If convertible, conversion rate	N/A							
27	If convertible, mandatory or optional conversion	N/A							

| 28 | If convertible, specifiy instrument type convertible into   | N/A              |
|----|---|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| 29 | If convertible, specifiy issuer of instrument it converts into  | N/A              |
| 30 | Write-down features   | No               |
| 31 | If write-down, write-down trigger (s)   | N/A              |
| 32 | If write-down, full or partial  | N/A              |
| 33 | If write-down, permanent or temporary   | N/A              |
| 34 | If temporary write-down, description of write-up mechanism  | N/A              |
| 35 | Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument) | Senior unsecured |
| 36 | Non-compliant transitioned features   | No               |
| 37 | If yes, specify non-compliant features  | N/A              |

Commission	31.12.2018	4450EURD026020	4212HSPD020020	4350KALDVAIH19	4309LIEDVAIH19	4309LIEDVAIH20	4309LIEDVAIH21	4309LIEDVAIH21A	4309LIEDVAIH22
implemen-	(EUR 1,000)	4430201010020020	42121101 2020020	4550111115 1111117	4307111117	4307111120	4307111121	4307212271112111	4307111111111111111111111111111111111111
ting regula-									
tion (EU) No 1423/2013									
1	Issuer	Eurajoen	Helmi	Kalannin	Liedon Säästöpankki	Liedon Säästöpankki	Liedon Säästöpankki	Liedon Säästöpankki	Liedon Säästöpankki
•	issue!	Säästöpankki	Säästöpankki Oy	Säästöpankki	Diedon Budstopunkin	Diedon Saastopanikki	Diedon baastopaniin	Diedon Saastopanikii	Dicuon buastopunkii
2	Unique identifier (ISIN)	FI4000157169	FI4000157516	FI4000108584	FI4000096896	FI4000153630	FI4000176474	FI4000201645	FI4000223946
3	Governing law(s) of the instrument	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish
4	Transitional CRR rules	T2	T2	T2	T2	T2	T2	T2	T2
5	Post-transitional CRR rules	T2	T2	T2	T2	T2	T2	T2	T2
6	Eligible at solo/(sub-)consolidated/solo & (sub-) consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated
7	Instrument type (types to be specified by each jurisdiction)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)
8	Amount recognised in regulatory capital	1,374	638	539	288	585	1,446	1,234	2,285
9	Nominal amount of instrument	3,584	1,762	3,000	2,211	1,791	3,390	2,344	3,634
9a	Issue price	100	100	100	100	100	100	100	100
9b	Redemption price	100%	100%	100%	100%	100%	100%	100%	100%
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	8.6.15	22.6.15	24.9.14	26.5.14	18.5.15	17.11.15	18.5.16	21.11.16
12	Perpeptual or dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	30.11.20	22.10.20	24.11.19	26.8.19	18.8.20	17.2.21	18.8.21	21.2.22
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates, and redemption amount	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
17	Fixed or floating dividend/coupon	fixed	fixed	floating	floating	floating	floating	floating	floating
18	Coupon rate and any related index	2.60%	2.00%	Fixed 2.50% (first year), thereafter 12-month Euribor + 0.5% (minimum 2.5%)	12-month Euribor + 0.50% (minimum rate 2.5 %)	12-month Euribor + 0.50% (minimum rate 2.0%)	12-month Euribor + 0.5%, min. 2%	12-month Euribor + 0.5%, min. 2%	12-month Euribor + 0.5%, min. 2%
19	Existence of a dividend stopper	No	No	No	No	No	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No	No
22	Noncumulative or cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

| 27 | If convertible, mandatory or optional conversion  | N/A              |
|----|---|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| 28 | If convertible, specifiy instrument type convertible into   | N/A              |
| 29 | If convertible, specifiy issuer of instrument it converts into  | N/A              |
| 30 | Write-down features   | No               |
| 31 | If write-down, write-down trigger (s)   | N/A              |
| 32 | If write-down, full or partial  | N/A              |
| 33 | If write-down, permanent or temporary   | N/A              |
| 34 | If temporary write-down, description of write-up mechanism  | N/A              |
| 35 | Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument) | Senior unsecured |
| 36 | Non-compliant transitioned features   | No               |
| 37 | If yes, specify non-compliant features  | N/A              |

Commission	31.12.2018	4309LIEDVAIH22A	4210MYRD030019	4210MYRD021020	4210MYRDVAIH23	4405NOSD027519	4405NOSDVAIH19	4405NOSDVAIH19A	4405NOSDVAIH20
implemen-	(EUR 1,000)	430/2122			42101111127111123	440311022027317	4403110227111117	440311002 111111/11	4403110221111120
ting regula- tion (EU) No									
1423/2013									
	Issuer	Liedon	Myrskylän	Myrskylän	Myrskylän	Nooa	Nooa	Nooa	Nooa
		Säästöpankki	Säästöpankki	Säästöpankki	Säästöpankki	Säästöpankki Oy	Säästöpankki Oy	Säästöpankki Oy	Säästöpankki Oy
2	Unique identifier (ISIN)	FI4000252200	FI4000099353	FI4000157482	FI4000288394	FI4000090287	FI4000108477	FI4000108469	FI4000153523
3	Governing law(s) of the instrument	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish
4	Transitional CRR rules	T2	T2	T2	T2	T2	T2	T2	T2
5	Post-transitional CRR rules	T2	T2	T2	T2	T2	T2	T2	T2
6	Eligible at solo/(sub-)consolidated/solo & (sub-) consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated
7	Instrument type (types to be specified by each jurisdiction)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)
8	Amount recognised in regulatory capital	1,051	244	296	1,139	222	248	277	455
9	Nominal amount of instrument	1,443	1,655	812	1,393	2,461	1,319	1,468	1,428
9a	Issue price	100	100	100	100	100	100	100	100
9b	Redemption price	100%	100%	100%	100%	100%	100%	100%	100%
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	22.5.17	26.6.14	26.6.15	1.11.17	14.4.14	10.9.14	10.9.14	4.5.15
12	Perpeptual or dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	22.8.22	26.9.19	26.10.20	1.2.23	14.6.19	10.12.19	10.12.19	4.8.20
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates, and redemption amount	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
17	Fixed or floating dividend/coupon	floating	fixed	fixed	floating	fixed	floating	floating	floating
18	Coupon rate and any related index	12-month Euribor (360) + 0,5%, min 2%	3,00%	2,10%	12-month Euribor + 0.50% (minimum rate 2.0 %)	2,75%	Fixed 2.75% until 10.12.2016, thereafter floating Euribor 12-month + 1.75%	Fixed 3.0% until 10.12.2016, thereafter floating Euribor 12-month + 2.0% (minimum 2.0%)	Fixed 2.5% until 4.8.2017, thereafter floating Euribor 12-month + 1.25% (minimum 1.25%)
19	Existence of a dividend stopper	No	No	No	No	No	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No	No
22	Noncumulative or cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

| 27 | If convertible, mandatory or optional conversion  | N/A              |
|----|---|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| 28 | If convertible, specifiy instrument type convertible into   | N/A              |
| 29 | If convertible, specifiy issuer of instrument it converts into  | N/A              |
| 30 | Write-down features   | No               |
| 31 | If write-down, write-down trigger (s)   | N/A              |
| 32 | If write-down, full or partial  | N/A              |
| 33 | If write-down, permanent or temporary   | N/A              |
| 34 | If temporary write-down, description of write-up mechanism  | N/A              |
| 35 | Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument) | Senior unsecured |
| 36 | Non-compliant transitioned features   | No               |
| 37 | If yes, specify non-compliant features  | N/A              |

Commission implemen- ting regula- tion (EU) No 1423/2013	31.12.2018 (EUR 1,000)	4405NOSDVAIH20A	4405NOSDVAIH21	4405NOSD015021	4405NOSJ015022	4405NOSDVAIH23	4327SSPDVAIH19
1	Issuer	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Someron Säästöpankki
2	Unique identifier (ISIN)	FI4000170626	FI4000201520	FI4000220165	FI4000251988	FI4000282975	FI4000104823
3	Governing law(s) of the instrument	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish
4	Transitional CRR rules	T2	T2	T2	T2	T2	T2
5	Post-transitional CRR rules	T2	T2	T2	T2	T2	T2
6	Eligible at solo/(sub-)consolidated/solo & (sub-)consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated
7	Instrument type (types to be specified by each jurisdiction)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)
8	Amount recognised in regulatory capital	1,187	731	966	502	536	270
9	Nominal amount of instrument	3,007	1,433	1,626	708	665	1,553
9a	Issue price	100	100	100	100	100	100
9b	Redemption price	100%	100%	100%	100%	100%	100%
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	21.9.15	20.4.16	19.9.16	18.4.17	11.10.17	14.8.14
12	Perpeptual or dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	21.12.20	20.7.21	20.12.21	18.7.22	11.1.23	14.11.19
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates, and redemption amount	N/A	N/A	N/A	N/A	N/A	N/A
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	N/A	N/A
17	Fixed or floating dividend/coupon	floating	floating	fixed	fixed	fixed	floating
18	Coupon rate and any related index	Fixed 2.75% until 21.12.2017, thereafter floating Euribor 12-month + 1.0 % (minimum 1.0%)	Fixed 2.75% until 20.7.2018, thereafter floating Euribor 12-month + 1.0 % (minimum 1.0%)	1.50%	1.50%	1.50%	Fixed 2.50% (first year), thereafter Euribor 12-month + 0.5% (minimum 1.5% - 3.00%)
19	Existence of a dividend stopper	No	No	No	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No
22	Noncumulative or cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A

27	If convertible, mandatory or optional conversion	N/A	N/A	N/A	N/A	N/A	N/A
28	If convertible, specifiy instrument type convertible into	N/A	N/A	N/A	N/A	N/A	N/A
29	If convertible, specifiy issuer of instrument it converts into	N/A	N/A	N/A	N/A	N/A	N/A
30	Write-down features	No	No	No	No	No	No
31	If write-down, write-down trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	N/A	N/A	N/A
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior unsecured					
36	Non-compliant transitioned features	No	No	No	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A	N/A	N/A

Commission	31.12.2018	4928AVAD0255019	4928AVAD022520	4928ĀVĀD021022	Share capital	Primary capital
implemen- ting regula-	(EUR 1,000)					
tion (EU) No						
1423/2013	Issuer	Ylihärmän Säästöpankki	Ylihärmän Säästöpankki	Ylihärmän Säästöpankki	Member Savings Banks	Member Savings Banks
2	Unique identifier (ISIN)	FI4000099320	FI4000153622	FI4000257449	N/A	N/A
3	Governing law(s) of the instrument	Finnish	Finnish	Finnish	Finnish	Finnish
3	Transitional CRR rules	T2	T2	T2	CET1	CET1
4	Post-transitional CRR rules	T2	T2	T2	CET1	CET <sub>1</sub>
5	Eligible at solo/(sub-)consolidated/solo & (sub-)consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated
7	Instrument type (types to be specified by each jurisdiction)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	CET1 as published in the EBA list (art. 26(3).	CET1 as published in the EBA list (art. 26(3).
8	Amount recognised in regulatory capital	315	895	2,653	20,195	34,475
9	Nominal amount of instrument	2,000	2,500	3,500	N/A	34,475
9a	Issue price	100	100	100	N/A	100 %
9b	Redemption price	100%	100%	100%	N/A	100 %
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Shareholders' equity	Primary capital holders' equity
11	Original date of issuance	23.6.14	11.5.15	8.5.17	Each savings bank limited company has a seperate issuance date of ordinary shares.	Each savings bank has seperate issuance dates of primary capital.
12	Perpeptual or dated	Dated	Dated	Dated	Perpetual	Perpetual
13	Original maturity date	15.10.19	15.10.20	15.10.22	No maturity	No maturity
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates, and redemption amount	N/A	N/A	N/A	N/A	Primary capital do not have a call date. However, according to Savings Bank act the bank 1) may purchase its own primary capital, and 2) owner of the primary capital has to surrender primary capital with or without compensation.
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	see row 15
17	Fixed or floating dividend/coupon	fixed	fixed	fixed	floating	floating
18	Coupon rate and any related index	2.55%	2.25%	2.10%	N/A	N/A
19	Existence of a dividend stopper	No	No	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory	Fully discretionary	Fully discretionary
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory	Fully discretionary	Fully discretionary
21	Existence of step up or other incentive to redeem	No	No	No	No	No
22	Noncumulative or cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A

27	If convertible, mandatory or optional conversion	N/A	N/A	N/A	N/A	N/A
28	If convertible, specifiy instrument type convertible into	N/A	N/A	N/A	N/A	N/A
29	If convertible, specifiy issuer of instrument it converts into	N/A	N/A	N/A	N/A	N/A
30	Write-down features	No	No	No	No	No
31	If write-down, write-down trigger (s)	N/A	N/A	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	N/A	N/A
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior unsecured	Senior unsecured	Senior unsecured	Debentures	Debentures
36	Non-compliant transitioned features	No	No	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A	N/A

Commission	31.12.2017	4503AITD015021	4503AITD020020	4503AITD025019	4912ĀVĀD021022	4912AVAD022520	4912ĀVĀD022521	4912AVAD0255019	4450EURD026020
implemen- ting regula- tion (EU) No	(EUR 1,000)								
1423/2013	Issuer	Aito Säästöpankki Oy	Aito Säästöpankki Oy	Aito Säästöpankki Oy	Avain Säästöpankki	Avain Säästöpankki	Avain Säästöpankki	Avain Säästöpankki	Eurajoen Säästö- pankki
2	Unique identifier (ISIN)	FI4000207030	FI4000153903	FI4000102686	FI4000257449	FI4000153622	FI4000201504	FI4000099320	FI4000157169
3	Governing law(s) of the instrument	Finnish							
4	Transitional CRR rules	T2							
5	Post-transitional CRR rules	T2							
6	Eligible at solo/(sub-)consolidated/solo & (sub-)consolidated	Solo & Consolidated							
7	Instrument type (types to be specified by each jurisdiction)	(EU) No 575/2013 article 486 (4)							
8	Amount recognised in regulatory capital	3,645	2,651	2,984	1,916	1,116	1,449	715	2,090
9	Nominal amount of instrument	5,000	5,000	8,000	2,000	2,000	2,000	2,000	3,584
9a	Issue price	100	100	100	100	100	100	100	100
9b	Redemption price	100%	100%	100%	100%	100%	100%	100%	100%
10	Accounting classification	Liability - amortised cost							
11	Original date of issuance	23.5.16	25.5.15	12.8.14	8.5.17	11.5.15	2.5.16	23.6.14	8.6.15
12	Perpeptual or dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	23.8.21	25.8.20	12.11.19	15.10.22	15.10.20	15.8.21	15.10.19	30.11.20
14	Issuer call subject to prior supervisory approval	Yes							
15	Optional call date, contingent call dates, and redemption amount	N/A							
16	Subsequent call dates, if applicable	N/A							
17	Fixed or floating dividend/coupon	fixed							
18	Coupon rate and any related index	1.50%	2.00%	2.50%	2.10%	2.25%	2.25%	2.55%	2.60%
19	Existence of a dividend stopper	No							
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory							
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory							
21	Existence of step up or other incentive to redeem	No							
22	Noncumulative or cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	N/A							
25	If convertible, fully or partially	N/A							
26	If convertible, conversion rate	N/A							
27	If convertible, mandatory or optional conversion	N/A							

| 28 | If convertible, specifiy instrument type convertible into   | N/A              |
|----|---|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| 29 | If convertible, specifiy issuer of instrument it converts into  | N/A              |
| 30 | Write-down features   | No               |
| 31 | If write-down, write-down trigger (s)   | N/A              |
| 32 | If write-down, full or partial  | N/A              |
| 33 | If write-down, permanent or temporary   | N/A              |
| 34 | If temporary write-down, description of write-up mechanism  | N/A              |
| 35 | Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument) | Senior unsecured |
| 36 | Non-compliant transitioned features   | No               |
| 37 | If yes, specify non-compliant features  | N/A              |

Commission	31.12.2017	4450EURDVAIH19	4212HSPD020020	4456HUID028518	4350KALDVAIH19	4309LIEDVAIH19	4309LIEDVAIH20	4309LIEDVAIH21	4309LIEDVAIH21A
implemen-	(EUR 1,000)	44302010 111117	42121151 2020020	443011012020310	4550111115 1111117	450711115 1111117	4307111120	43072122 111121	430711112111
ting regula-									
tion (EU) No 1423/2013									
1423/2013	Issuer	Eurajoen Säästö-	Helmi Säästöpankki	Huittisten Säästö-	Kalannin Säästö-	Liedon Säästöpankki	Liedon Säästöpankki	Liedon Säästöpankki	Liedon Säästöpankki
*	issuei	pankki	Oy	pankki	pankki	Liedon Saastopankki	Liedon Saastopankki	Liedon Saastopankki	Liedon Saastopankki
2	Unique identifier (ISIN)	FI4000092606	FI4000157516	FI4000071543	FI4000108584	FI4000096896	FI4000153630	FI4000176474	FI4000201645
7	Governing law(s) of the instrument	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish
3	Transitional CRR rules	Ta Ta	T2	T2	Tallinsii T2	Tallinish	T2	T2	Taminish T2
5	Post-transitional CRR rules	T2	T2	T2	T2	T2	T2	T2	T2
3		Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated
6	Eligible at solo/(sub-)consolidated/solo & (sub-) consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated
7	Instrument type (types to be specified by each jurisdiction)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)
8	Amount recognised in regulatory capital	274	990	253	1,139	730	943	2,124	1,702
9	Nominal amount of instrument	5,513	1,762	5,000	3,000	2,211	1,791	3,390	2,344
9a	Issue price	100	100	100	100	100	100	100	100
9b	Redemption price	100%	100%	100%	100%	100%	100%	100%	100%
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	2.6.14	22.6.15	18.11.13	24.9.14	26.5.14	18.5.15	17.11.15	18.5.16
12	Perpeptual or dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	2.6.19	22.10.20	18.11.18	24.11.19	26.8.19	18.8.20	17.2.21	18.8.21
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates, and	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
-5	redemption amount	1,11	1,1,11	1,11	14/11	14/11	11/11	1,711	14/11
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
17	Fixed or floating dividend/coupon	floating	fixed	fixed	floating	floating	floating	floating	floating
18	Coupon rate and any related index	Floating Euribor 12-month + 2.0% (mini- mum rate 3.0%)	2.00 %	2.85 %	Fixed 2.5% (first year), thereafter floating 12-month Euribor + 0.5% (minimum rate 2.5%)	12-month Euribor + 0.50% (minimum rate 2.50%)	12-month Euribor + 0.50% (minimum rate 2.0%)	12-month Euribor + 0.50% (minimum rate 2.0%)	12-month Euribor + 0.50% (minimum rate 2.0%)
19	Existence of a dividend stopper	No	No	No	No	No	No	No	No
20a	Fully discretionary, partially discretionary or man- datory (in terms of timing)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
20b	Fully discretionary, partially discretionary or man- datory (in terms of amount)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No	No
22	Noncumulative or cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

| 27 | If convertible, mandatory or optional conversion  | N/A              |
|----|---|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| 28 | If convertible, specifiy instrument type convertible into   | N/A              |
| 29 | If convertible, specifiy issuer of instrument it converts into  | N/A              |
| 30 | Write-down features   | No               |
| 31 | If write-down, write-down trigger (s)   | N/A              |
| 32 | If write-down, full or partial  | N/A              |
| 33 | If write-down, permanent or temporary   | N/A              |
| 34 | If temporary write-down, description of write-up mechanism  | N/A              |
| 35 | Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument) | Senior unsecured |
| 36 | Non-compliant transitioned features   | No               |
| 37 | If yes, specify non-compliant features  | N/A              |

Commission	31.12.2017	4309LIEDVAIH22	4309LIEDVAIH22A	4210MYRD021020	4210MYRD030019	4210MYRDVAIH23	4405NOSD015021	4405NOSD027519	4405NOSDVAIH19
implemen- ting regula- tion (EU) No 1423/2013	(EUR 1,000)								
	Issuer	Liedon Säästöpankki	Liedon Säästöpankki	Myrskylän Säästö- pankki	Myrskylän Säästö- pankki	Myrskylän Säästö- pankki	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy
2	Unique identifier (ISIN)	FI4000223946	FI4000252200	FI4000157482	FI4000099353	FI4000288394	FI4000220165	FI4000090287	FI4000108477
3	Governing law(s) of the instrument	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish
4	Transitional CRR rules	T2	T2	T2	T2	T2	T2	T2	T2
5	Post-transitional CRR rules	T2	T2	T2	T2	T2	T2	T2	T2
6	Eligible at solo/(sub-)consolidated/solo & (sub-)consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated
7	Instrument type (types to be specified by each jurisdiction)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)
8	Amount recognised in regulatory capital	3,011	1,339	458	575	1,393	1,291	714	512
9	Nominal amount of instrument	3,634	1,443	812	1,655	1,393	1,626	2,461	1,319
9a	Issue price	100	100	100	100	100	100	100	100
9b	Redemption price	100%	100%	100%	100%	100%	100%	100%	100%
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	21.11.16	22.5.17	26.6.15	26.6.14	1.11.17	19.9.16	14.4.14	10.9.14
12	Perpeptual or dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	21.2.22	22.8.22	26.10.20	26.9.19	1.2.23	20.12.21	14.6.19	10.12.19
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates, and redemption amount	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
17	Fixed or floating dividend/coupon	floating	floating	fixed	fixed	floating	fixed	fixed	floating
18	Coupon rate and any related index	12-month Euribor + 0.50% (minimum rate 2.0 %)	12-month Euribor + 0.50% (minimum rate 2.0%)	2.10%	3.00%	12-month Euribor + 0.50% (minimum rate 2.0%)	1.50%	2.75%	Fixed 2.75% until 10.12.2016, thereafter floating 12-month Euribor +1.75%
19	Existence of a dividend stopper	No	No	No	No	No	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No	No
22	Noncumulative or cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

| 27 | If convertible, mandatory or optional conversion  | N/A              |
|----|---|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| 28 | If convertible, specifiy instrument type convertible into   | N/A              |
| 29 | If convertible, specifiy issuer of instrument it converts into  | N/A              |
| 30 | Write-down features   | No               |
| 31 | If write-down, write-down trigger (s)   | N/A              |
| 32 | If write-down, full or partial  | N/A              |
| 33 | If write-down, permanent or temporary   | N/A              |
| 34 | If temporary write-down, description of write-up mechanism  | N/A              |
| 35 | Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument) | Senior unsecured |
| 36 | Non-compliant transitioned features   | No               |
| 37 | If yes, specify non-compliant features  | N/A              |

Commission implemen-	31.12.2017 (EUR 1,000)	4405NOSDVAIH19A	4405NOSDVAIH20	4405NOSDVAIH20A	4405NOSDVAIH21	4405NOSDVAIH23	4405NOSJ015022	4327SSPDVAIH19
ting regula- tion (EU) No 1423/2013								
1	Issuer	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Someron Säästö- pankki
2	Unique identifier (ISIN)	FI4000108469	FI4000153523	FI4000170626	FI4000201520	FI4000282975	FI4000251988	FI4000104823
3	Governing law(s) of the instrument	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish	Finnish
4	Transitional CRR rules	T2	T2	T2	T2	T2	T2	T2
5	Post-transitional CRR rules	T2	T2	T2	T2	T2	T2	T2
6	Eligible at solo/(sub-)consolidated/solo & (sub-)consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated
7	Instrument type (types to be specified by each jurisdiction)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)
8	Amount recognised in regulatory capital	570	741	1,788	1,018	665	644	581
9	Nominal amount of instrument	1,468	1,428	3,007	1,433	665	708	1,553
9a	Issue price	100	100	100	100	100	100	100
9b	Redemption price	100%	100%	100%	100%	100%	100%	100%
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	10.9.14	4.5.15	21.9.15	20.4.16	11.10.17	18.4.17	14.8.14
12	Perpeptual or dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	10.12.19	4.8.20	21.12.20	20.7.21	11.1.23	18.7.22	14.11.19
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates, and redemption amount	N/A	N/A	N/A	N/A	N/A	N/A	N/A
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	N/A	N/A	N/A
17	Fixed or floating dividend/coupon	floating	fixed	fixed	fixed	fixed	fixed	floating
18	Coupon rate and any related index	Fixed 3.0% until 10.12.2016, thereafter floating 12-month Euribor + 2.0%	1.25%	1.00%	1.50%	1.50%	1.50 %	Fixed 2.50% (first year), thereafter 12-month Euribor + 0.5% (minium 1.5% - 3.00%)
19	Existence of a dividend stopper	No	No	No	No	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No
22	Noncumulative or cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A

| 27 | If convertible, mandatory or optional conversion  | N/A              |
|----|---|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| 28 | If convertible, specifiy instrument type convertible into   | N/A              |
| 29 | If convertible, specifiy issuer of instrument it converts into  | N/A              |
| 30 | Write-down features   | No               |
| 31 | If write-down, write-down trigger (s)   | N/A              |
| 32 | If write-down, full or partial  | N/A              |
| 33 | If write-down, permanent or temporary   | N/A              |
| 34 | If temporary write-down, description of write-up mechanism  | N/A              |
| 35 | Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument) | Senior unsecured |
| 36 | Non-compliant transitioned features   | No               |
| 37 | If yes, specify non-compliant features  | N/A              |

Commission	31.12.2017	4928AVAD021022	4928ĀVĀD022520	4928AVAD0255019	Share capital	Primary capital
implemen- ting regula-	(EUR 1,000)					
tion (EU) No 1423/2013						
1	Issuer	Ylihärmän Säästö- pankki	Ylihärmän Säästö- pankki	Ylihärmän Säästö- pankki	Member Savings Banks	Member Savings Banks
2	Unique identifier (ISIN)	FI4000257449	FI4000153622	FI4000099320	N/A	N/A
3	Governing law(s) of the instrument	Finnish	Finnish	Finnish	Finnish	Finnish
4	Transitional CRR rules	T2	T2	T2	CET1	CET <sub>1</sub>
5	Post-transitional CRR rules	T2	T2	T2	CET1	CET <sub>1</sub>
6	Eligible at solo/(sub-)consolidated/solo & (sub-)consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated
7	Instrument type (types to be specified by each jurisdiction)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	(EU) No 575/2013 article 486 (4)	CET1 as published in the EBA list (art. 26(3).	CET1 as published in the EBA list (art. 26(3).
8	Amount recognised in regulatory capital	3,352	1,395	715	20,195	34,475
9	Nominal amount of instrument	3,500	2,500	2,000	N/A	34,475
9a	Issue price	100	100	100	N/A	100 %
9b	Redemption price	100%	100%	100%	N/A	100 %
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Shareholders' equity	Primary capital holders' equity
11	Original date of issuance	8.5.17	11.5.15	23.6.14	Each savings bank limited company has a seperate issuance date of ordinary shares.	Each savings bank has seperate issuance dates of primary capital.
12	Perpeptual or dated	Dated	Dated	Dated	Perpetual	Perpetual
13	Original maturity date	15.10.22	15.10.20	15.10.19	No maturity	No maturity
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates, and redemption amount	N/A	N/A	N/A	N/A	Primary capital do not have a call date. However, according to Savings Bank act the bank 1) may purchase its own primary capital, and 2) owner of the primary capital has to surrender primary capital with or without compensation.
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	see row 15
17	Fixed or floating dividend/coupon	fixed	fixed	fixed	floating	floating
18	Coupon rate and any related index	2.10%	2.25%	2.55%	N/A	N/A
19	Existence of a dividend stopper	No	No	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory	Fully discretionary	Fully discretionary
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory	Fully discretionary	Fully discretionary
21	Existence of step up or other incentive to redeem	No	No	No	No	No
22	Noncumulative or cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative	Non cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger (s)	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A

27	If convertible, mandatory or optional conversion	No	No	No	No	N/A
28	If convertible, specifiy instrument type convertible into	Mandatory	Mandatory	Mandatory	Completely discretionary	N/A
29	If convertible, specify issuer of instrument it converts into	Mandatory	Mandatory	Mandatory	Completely discretionary	N/A
30	Write-down features	No	No	No	No	No
31	If write-down, write-down trigger (s)	Non cumulative	Non cumulative	Non cumulative	Non cumulative	N/A
32	If write-down, full or partial	Non-convertible	Non-convertible	Non-convertible	Non-convertible	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	N/A	N/A
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior unsecured	Senior unsecured	Senior unsecured	Debentures	Debentures
36	Non-compliant transitioned features	No	No	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A	N/A

# **NOTE 4: RECONCILIATION OF OWN FUNDS**

Reconciliation of own funds

(EUR 1,000)	31.12.2018	31.12.2017
Total shareholders' equity (IFRS)	1,028,795	1,017,520
Deductions	-42,180	-47,989
CET1 capital before statutory adjustments	986,615	969,531
Profit for the period	-1,852	-2,607
Cash flow hedging	-3,753	-2,867
Intangible assets	-28,682	-23,608
Difference in deferred tax assets	-4,237	-1,510
Adjustment for the transition period in CET1 capital		
Total CET1 capital	948,092	938,939

# **NOTE 5: MINIMUM CAPITAL REQUIREMENT**

Credit and counterparty risk	31.12.18	31.12.18	31.12.17	31.12.17
Exposure class (EUR 1,000)	Risk weighted assets	Capital requirement	Risk weighted assets	Capital requirement
Exposures to central governments or central banks	117	9		
Exposures to regional governments or local authorities	456	36	498	40
Exposures to public sector entities				
Exposures to multilateral development banks	64	5	161	13
Exposures to international organisations				
Exposures to institutions	33,212	2,657	38,535	3,083
Exposures to corporates	1,035,938	82,875	1,002,963	80,237
Retail exposures	858,435	68,675	850,380	68,030
Exposures secured by mortgages on immovable property	2,147,289	171,783	1,943,450	155,476
Exposures in default	61,471	4,918	53,963	4,317
Exposures associated with particularly high risk	9,002	720	8,080	646
Exposures in the form of covered bonds	5,242	419	5,147	412
Items representing securitisation positions				
Exposures to institutions and corporates with a short-term credit assesment				
Exposures in the form of units or shares in collective investment undertakings (CIUs)	434,121	34,730	469,694	37,575
Equity exposures*)	85,254	6,820	87,942	7,035
Other items	145,364	11,629	141,109	11,289
Credit risk total	4,815,965	385,277	4,601,921	368,154
Credit valuation adjustment (CVA)	72,423	5,794	72,541	5,803
Market risk	38,332	3,067	39,879	3,190
Operational risk	458,844	36,708	451,354	36,108
Total	5,385,564	430,845	5,165,694	413,256

# **NOTE 6: TOTAL EXPOSURE**

## Credit and counterparty risk

Exposure class (EUR 1,000)	Balance sheet items	Off balance sheet items	Derivatives	Total
Exposures to central governments or central banks	1,092,862	2		1,092,864
Exposures to regional governments or local authorities	10,718	7,068		17,786
Exposures to public sector entities				
Exposures to multilateral development banks	1,137			1,137
Exposures to international organisations				
Exposures to institutions	20,612	274	83 739	104,625
Exposures to corporates	1,050,388	192,353		1,242,741
Retail exposures	1,625,560	354,433		1,979,993
Exposures secured by mortgages on immovable property	6,179,991	141,646		6,321,636
Exposures in default	74,275	51		74,326
Exposures associated with particularly high risk	6,001			6,001
Exposures in the form of covered bonds	52,423			52,423
Items representing securitisation positions				
Exposures to institutions and corporates with a short-term credit assesment				
Exposures in the form of units or shares in collective investment undertakings (CIUs)	458,226			458,226
Equity exposures	47,380			47,380
Other items	162,039			162,039
Total	10,781,614	695,826	83 739	11,561,179

Exposure class (EUR 1,000)	Balance sheet items	Off balance sheet items	Derivatives	Total
Exposures to central governments or central banks	1,292,569	2		1,292,571
Exposures to regional governments or local authorities	14,449	3,607		18,056
Exposures to public sector entities				
Exposures to multilateral development banks	51,188			51,188
Exposures to international organisations				
Exposures to institutions	29,397	257	87,642	117,296
Exposures to corporates	1,022,237	140,116		1,162,353
Retail exposures	1,544,813	341,647		1,886,460
Exposures secured by mortgages on immovable property	5,585,622	144,055		5,729,677
Exposures in default	72,207	65		72,273
Exposures associated with particularly high risk	5,387			5,387
Exposures in the form of covered bonds	39,244			39,244
Items representing securitisation positions				
Exposures to institutions and corporates with a short-term credit assesment				
Exposures in the form of units or shares in collective investment undertakings (CIUs)	527,127			527,127
Equity exposures	50,068			50,068
Other items	164,227			164,227
Total	10,398,535	629,749	87,642	11,115,925

# **NOTE 7: CREDIT RISK EXPOSURES BY RISK WEIGHTS**

Risk weight (%)	31.12.2018 (EUR 1,000)	31.12.2017 (EUR 1,000)
0	1,133,721	1,386,319
10	52,423	38,673
20	130,324	161,554
35	6,238,350	5,695,825
50	101,983	62,749
_75	1,979,993	1,886,460
100	1,816,094	1,787,586
150	83,041	71,509
250	25,249	25,249
350		
1250		
Total exposure	11,561,179	11,115,925

# **NOTE 8: CREDIT RISK EXPOSURES BY MATURITY**

## Credit risk exposures by maturity

(EUR 1,000)	31.12.2018					
Exposure class	Total	less than 3 months	3-12 months	1-5 years	5-10 years	over 10 years
Exposures to central governments or central banks	1,092,864	897,851	16,771	85,349	92,495	399
Exposures to regional governments or local authorities	17,786	5,000	481	6,616	1,616	4,073
Exposures to public sector entities						
Exposures to multilateral development banks	1,137	38		1,099		
Exposures to international organisations						
Exposures to institutions	104,625	2,365	9,108	37,667	1,854	53,632
Exposures to corporates	1,242,741	113,347	148,246	331,878	235,782	413,488
Retail exposures	1,979,993	43,148	72,510	209,639	324,234	1,330,462
Exposures secured by mortages on immovable property	6,321,636	78,302	98,790	439,274	969,798	4,735,472
Exposures in default	74,326	35,422	3,350	3,845	8,580	23,130
Exposures associated with particularly high risk	6,001					6,001
Exposures in the form of covered bonds	52,423		2,136	20,199	30,089	
Items representing securitisation positions						
Exposures to institutions and corporates with a short-term credit assesment						
Exposures in the form of units or shares in collective investment undertakings (CIUs)	458,226					458,226
Equity exposures	47,380					47,380
Other items	162,039	62,003		118		99,917
Total exposures	11,561,179	1,237,476	351,391	1,135,684	1,664,449	7,172,180

(EUR 1,000)	31.12.2017					
Exposure class	Total	less than 3 months	3-12 months	1-5 years	5-10 years	over 10 years
Exposures to central governments or central banks	1,292,571	1,102,623	2,164	103,024	83,355	1,406
Exposures to regional governments or local authorities	18,056	1,767	116	9,416	1,785	4,972
Exposures to public sector entities						
Exposures to multilateral development banks	51,188			51,188		
Exposures to international organisations						
Exposures to institutions	117,296	3,446	20,759	39,682	2,430	50,979
Exposures to corporates	1,162,353	80,096	105,343	383,790	215,799	377,326
Retail exposures	1,886,460	53,820	67,807	220,331	322,693	1,221,809
Exposures secured by mortages on immovable property	5,729,677	66,876	97,262	430,606	912,892	4,222,040
Exposures in default	72,273	36,238	3,128	4,436	5,712	22,759
Exposures associated with particularly high risk	5,387					5,387
Exposures in the form of covered bonds	39,244			12,514	26,730	
Items representing securitisation positions						
Exposures to institutions and corporates with a short-term credit assesment						
Exposures in the form of units or shares in collective investment undertakings (CIUs)	527,127					527,127
Equity exposures	50,068					50,068
Other items	164,227	64,286		124		99,816
Total exposures	11,115,925	1,409,152	296,578	1,255,110	1,571,396	6,583,689

# **NOTE 9: CREDIT RISK EXPOSURES BY BUSINESS SEGMENTS**

(EUR 1,000)	31.12.2018					
Exposure class	Total	Other	Private customers	Agricultural	Corporate	-of which SME exposures
Exposure class	1,092,864	1,092,864				
Exposures to central governments or central banks	17,786	17,786				
Exposures to regional governments or local authorities						
Exposures to public sector entities	1,137	1,137				
Exposures to multilateral development banks						
Exposures to international organisations	104,625	104,625				
Exposures to institutions	1,242,741	340,278	66,026	153,786	682,651	168,812
Exposures to corporates	1,979,993	42,713	1,342,512	223,244	371,524	410,960
Retail exposures	6,321,636	272,208	5,297,032	207,247	545,149	604,322
Exposures secured by mortages on immovable property	74,326	773	39,580	3,062	30,912	
Exposures in default	6,001	6,001				
Exposures associated with particularly high risk	52,423	52,423				
Exposures in the form of covered bonds						
Items representing securitisation positions						
Exposures to institutions and corporates with a short-term credit assesment	458,226	458,226				
Exposures in the form of units or shares in collective in- vestment undertakings (CIUs)	47,380	44,509			2,871	
Equity exposures	162,039	162,039				
Other items						
Total exposures	11,561,179	2,595,583	6,745,150	587,339	1,633,108	1,184,093

(EUR 1,000)	31.12.2017					
Exposure class	Total	Other	Private cus- tomers	Agricultural	Corporate	-of which SME exposures
Exposures to central governments or central banks	1,292,571	1,292,571				
Exposures to regional governments or local authorities	18,056	18,056				
Exposures to public sector entities						
Exposures to multilateral development banks	51,188	51,188				
Exposures to international organisations						
Exposures to institutions	117,296	117,296				
Exposures to corporates	1,162,353	329,861	39,440	103,690	689,364	152,341*
Retail exposures	1,886,460	87,002	1,191,335	190,721	417,401	414,876*
Exposures secured by mortages on immovable property	5,729,677	214,763	4,866,107	188,103	460,705	487,478*
Exposures in default	72,273	7,005	40,416	3,614	21,238	
Exposures associated with particularly high risk	5,387	5,387				
Exposures in the form of covered bonds	39,244	37,885			1,359	
Items representing securitisation positions						
Exposures to institutions and corporates with a short-term credit assesment						
Exposures in the form of units or shares in collective in- vestment undertakings (CIUs)	527,127	527,127				
Equity exposures	50,068	35,798			14,269	
Other items	164,227	164,227				
Total exposures	11,115,925	2,888,165	6,137,298	486,127	1,604,336	1 054 695

<sup>\*</sup>The figure for 2017 has been corrected.

# NOTE 10: GUARANTEES TAKEN INTO ACCOUNT IN THE CAPITAL ADEQUACY CALCULATIONS

(EUR 1,000)	31.12.2018				
Exposure class	Total exposures	Guarantees	Financial guarantees	Other guarantees	
Exposures to central governments or central banks	1,092,864				
Exposures to regional governments or local authorities	17,786		186		
Exposures to public sector entities					
Exposures to multilateral development banks	1,137				
Exposures to international organisations					
Exposures to institutions	104,625				
Exposures to corporates	1,242,741	56,348	8,027	891	
Retail exposures	1,979,993	455,043	39,344	1,136	
Exposures secured by mortages on immovable property	6,321,636			6,313,443	
Exposures in default	74,326	2,186	394	38	
Exposures associated with particularly high risk	6,001				
Exposures in the form of covered bonds	52,423				
Items representing securitisation positions					
Exposures to institutions and corporates with a short-term credit assesment					
Exposures in the form of units or shares in collective investment undertakings (CIUs)	458,226				
Equity exposures	47,380				
Other items	162,039				
Total exposures	11,561,179	513,576	47,951	6,315,508	

(EUR 1,000)	31.12.2017			
Exposure class	Total exposures	Guarantees	Financial guarantees	Other guarantees
Exposures to central governments or central banks	1,292,571			
Exposures to regional governments or local authorities	18,056		213	
Exposures to public sector entities				
Exposures to multilateral development banks	51,188			
Exposures to international organisations				
Exposures to institutions	117,296			
Exposures to corporates	1,162,353	43,837	7,716	927
Retail exposures	1,886,460	391,827	38,015	1,071
Exposures secured by mortages on immovable property	5,729,677			5,722,593
Exposures in default	72,273	2,179	180	41
Exposures associated with particularly high risk	5,387			
Exposures in the form of covered bonds	39,244			
Items representing securitisation positions				
Exposures to institutions and corporates with a short-term credit assesment				
Exposures in the form of units or shares in collective investment undertakings (CIUs)	527,127			
Equity exposures	50,068			
Other items	164,227			
Total exposures	11,115,925	437,844	46,125	5,724,631

# NOTE 11: THE GEOGRAPHICAL DISTRIBUTION OF RELEVANT CREDIT EXPOSURES

(EUR 1,000)	31.12.2018		
Exposure class	Total	Finland	Other countries
Exposures to central governments or central banks	1,092,864	950,339	142,525
Exposures to regional governments or local authorities	17,786	17,786	
Exposures to public sector entities			
Exposures to multilateral development banks	1,137		1,137
Exposures to international organisations			
Exposures to institutions	104,625	58,353	46,272
Exposures to corporates	1,242,741	1,092,133	150,608
Retail exposures	1,979,993	1,974,046	5,947
Exposures secured by mortages on immovable property	6,321,636	6,310,882	10,754
Exposures in default	74,326	74,133	193
Exposures associated with particularly high risk	6,001	6,001	
Exposures in the form of covered bonds	52,423	8,190	44,233
Items representing securitisation positions			
Exposures to institutions and corporates with a short-term credit assesment			
Exposures in the form of units or shares in collective investment undertakings (CIUs)	458,226	286,856	171,370
Equity exposures	47,380	42,727	4,653
Other items	162,039	162,039	
Total exposures	11,561,179	10,983,486	577,693

(EUR 1,000)	31.12.2017		
Exposure class	Total	Finland	Other countries
Exposures to central governments or central banks	1,292,571	1,150,388	142,184
Exposures to regional governments or local authorities	18,056	18,056	
Exposures to public sector entities			
Exposures to multilateral development banks	51,188	50,000	1,188
Exposures to international organisations			
Exposures to institutions	117,296	51,778	65,517
Exposures to corporates	1,162,353	1,036,117	126,236
Retail exposures	1,886,460	1,880,860	5,599
Exposures secured by mortages on immovable property	5,729,677	5,719,258	10,419
Exposures in default	72,273	72,265	7
Exposures associated with particularly high risk	5,387	5,387	
Exposures in the form of covered bonds	39,244	8,297	30,946
Items representing securitisation positions			
Exposures to institutions and corporates with a short-term credit assesment			
Exposures in the form of units or shares in collective investment undertakings (CIUs)	527,127	346,138	180,989
Equity exposures	50,068	44,401	5,667
Other items	164,227	164,227	
Total exposures	11,115,925	10,547,172	568,753

# **NOTE 12: ASSET ENCUMBRANCE**

Template A - Encumbered and unencumbered assets

31.12.2018 (EUR 1,000)		Carrying amount of encumbered		Fair value o			nt of unencumbered	Fair value of encumbered assets		
		assets of which notionally elligible EHQLA and HQLA		of which notionally elligible EHQLA and HQLA		of which EHQLA and HQLA			of which EHQLA and HQLA	
		010	030	040	050	060	080	090	100	
010	Assets of the reporting institution	1,727,440				8,821,781				
030	Equity instruments					48,946				
040	Debt securities	49,658		49,638		1,165,260		1,166,534		
050	of which: covered bonds	2,049		2,049		52,925		52,925		
060	of which: asset-backed securities									
070	of which: issued by general governments	18,134		18,160		173,725		175,270		
080	of which: issued by financial corporations	7,575		7,575		616,741		616,772		
090	of which: issued by non-financial corporations	27,371		27,371		364,055		364,101		
120	Other assets	1,678,111				6,574,633				
121	of which: mortgage loans	1,678,111				6,108,895				

## Template B-Collateral received

	31.12.2018 (EUR 1,000)			Unencumbe	ered	
			umbered collateral lebt securities issued	Fair value of collateral received or own debt securities issued available for encumbrance		
			of which notionally elligible EHQLA and HQLA		of which EHQLA and HQLA	
		010	030	040	060	
130	Collateral received by the reporting institution					
140	Loans on demand					
150	Equity instruments					
160	Debt securities					
170	of which: covered bonds					
180	of which: asset-backed securities					
190	of which: issued by general governments					
200	of which: issued by financial corporations					
210	of which: issued by non-financial corporations					
220	Loans and advances other than loans on demand					
230	Other collateral received					
231	of which:					
240	Own debt securities issued other than own covered bonds or asset-backed securities					
241	Own covered bonds and as- set-backed securities issued and not yet pledged					
250	TOTAL ASSETS, COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	1,727,440				

#### Template C-Sources of encumbrance

	31.12.2018 (EUR 1,000)	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered
		010	030
010	Carrying amount of selected financial liabilities	1,035,369	1,727,440
011	of which: covered bonds	997,369	1,678,111

#### Template D - Accompanying narrative information

The figures in templates A-C are median values calculated from 2018 quarter end values. The Amalgamation's asset encumbrance level was 16,9% at the end of 2018. The most significant source of asset encumbrance for the Amalgamation were covered bonds issued by Sp Mortgage Bank. Mortgage bank activity accounted for 97% of the Amalgamation's asset encumbrance. Sp Mortgage Bank had EUR 1,000 million of outstanding covered bonds and EUR 1,782 million of encumbered mortgage loans. The amalgamation has not retained any of Sp Mortgage Bank's issued covered bonds.

## Disclosure of asset encumbrance

Template A - Encumbered and unencumbered assets

31.12.2017 (EUR 1,000) Carrying an		Carrying amount	of encumbered assets	Fair value o	of encumbered assets	Carrying amou	int of encumbered assets	Fair value of encumbered assets		
			of which notionally elligible EHQLA and HQLA		of which notionally elligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA	
		010	030	040	050	060	080	090	100	
010	Assets of the reporting institution	1,202,744				8,700,389				
030	Equity instruments					571,819				
040	Debt securities	51,403		51,403		670,517		672,792		
050	of which: covered bonds	2,085		2,085		37,260		37,260		
060	of which: asset-backed securities									
070	of which: issued by general governments	15,682		15,682		179,110		181,162		
080	of which: issued by financial corporations	6,912		6,912		99,398		99,452		
090	of which: issued by non-financial corporations	29,487		29,487		384,519		384,614		
120	Other assets	1,151,819				6,375,597				
121	of which: mortgage loans	1,151,819				5,655,839				

## Template B-Collateral received

	31.12.2017 (EUR 1,000)			Unencumbe	ered	
			umbered collateral lebt securities issued	Fair value of collateral received or own debt securities issued available for encumbrance		
			of which notionally elligible EHQLA and HQLA		of which EHQLA and HQLA	
		010	030	040	060	
130	Collateral received by the reporting institution					
140	Loans on demand					
150	Equity instruments					
160	Debt securities					
170	of which: covered bonds					
180	of which: asset-backed securities					
190	of which: issued by general governments					
200	of which: issued by financial corporations					
210	of which: issued by non-financial corporations					
220	Loans and advances other than loans on demand					
230	Other collateral received					
240	Own debt securities issued other than own covered bonds or asset-backed securities					
241	Own covered bonds and asset-backed securities issued and not yet pledged					
250	TOTAL ASSETS, COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	1,202,744				

## Template C-Sources of encumbrance

	31.12.2017 (EUR 1,000)	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered
		010	030
010	Carrying amount of selected financial liabilities	537,009	1,202,744
011	of which: covered bonds	499,009	1,151,819

## **NOTE 13: OPERATIONAL RISK**

(EUR 1,000)	2018	2017	2016	2015	2014	Capital requirement
Cross income total	228,145	269,001	237,005	216,160	221,155	
Profit indicator	34,222	40,350	35,551	32,424	33,173	36,708

(EUR 1,000)	2017	2016	2015	2014	2013	Capital requirement
Cross income total	269,001	237,005	216,160	221,155	192,699	
Profit indicator	40,350	35,551	32,424	33,173	28,905	36,108

Profit indicator is calculated to basic indicator approach which is described in EU:s regulation No 575/2013.

Minimium capital requirement = sum of yearly positive profit indicators / sum of the years the profit indicator has been positive.

Operational risk means the possibility of losses that can be caused by unsufficient internal processes, personnel, systems or external factor.

# **NOTE 14: LEVERAGE RATIO**

Summary reconciliation of accounting assets and leverage ratio exposures

(EUR 1,000)		31.12.2018	31.12.2017
1	Total assets as per published financial statements	10,864,536	10,471,126
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	-	-
3	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio exposure measure in accordance with Article 429(13) of Regulation (EU) No 575/2013	-	-
4	Adjustments for derivative financial instruments	20,454	23,481
5	Adjustments for securities financing transactions (SFTs)	-	-
6	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	240,219	222,765
EU-6a	(Adjustment for intragroup exposures excluded from the leverage ratio exposure measure in accordance with Article 429 (7) of Regulation (EU) No 575/2013)	-	-
EU-6b	(Adjustment for exposures excluded from the leverage ratio exposure measure in accordance with Article 429 (14) of Regulation (EU) No 575/2013)	-	-
7	Other adjustments	-89,959	-76,591
8	Total leverage ratio exposure measure	11,035,250	10,640,780

Leverage r	atio common disclosure	CRR leverage ra 31.12.2018	RR leverage ratio exposures 31.12.2018 31.12.2017		
On-balanc	e sheet exposures (excluding derivatives and SFTs)				
1	On-balance sheet items (excluding derivatives, SFTs and fiduciary assets, but including collateral)	10,747,668	10,358,358		
2	(Asset amounts deducted in determining Tier 1 capital)	-36,672	-27,984		
3	Total on-balance sheet exposures (excluding derivatives, SFTs and fiduciary assets) (sum of lines 1 and 2)	10,710,995	10,330,373		
Derivative	exposures				
4	Replacement cost associated with all derivatives transactions (ie net of eligible cash variation margin)	63,581	64,161		
5	Add-on amounts for PFE associated with all derivatives transactions (mark-to-market method)	20,454	23,481		
EU-5a	Exposure determined under Original Exposure Method				
11	Total derivative exposures (sum of lines 4 to 10)	84,036	87,642		
Securities	financing transaction exposures				
16	Total securities financing transaction exposures (sum of lines 12 to 15a)	0	0		
Other off-	balance sheet exposures				
17	Off-balance sheet exposures at gross notional amount	695,826	629,749		
18	Adjustments related to credit conversion factors	-455,607	-406,984		
19	Other off-balance sheet exposures (sum of lines 17 and 18)	240,219	222,765		
	exposures in accordance with Article 429(7) and (14) of Regulation (EU) 13 (on and off balance sheet)				
Capital an	d total exposures				
20	Tier 1 capital	948,092	938,939		
21	Leverage ratio total exposure measure (sum of lines 3, 11, 16, 19, EU-19a and EU-19b)	11,035,250	10,640,780		
Leverage r	ratio				
22	Leverage ratio	8.59%	8.82 %		
Choice on	transitional arrangements and amount of derecognised fiduciary items				
EU-23	Choice on transitional arrangements for the definition of the capital measure	-	-		
EU-24	Amount of derecognised fiduciary items in accordance with Article 429(11) of Regulation (EU) NO 575/2013	-	-		

	on balance sheet exposures (excluding derivatives, SFTs ted exposures)	CRR leverage ratio exposures		
		31.12.2018	31.12.2017	
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	10,747,668	10,358,358	
EU-2	Trading book exposures			
EU-3	Banking book exposures, of which:	10,747,668	10,358,358	
EU-4	Covered bonds	52,423	39,244	
EU-5	Exposures treated as sovereigns	1,562,321	1,742,064	
EU-6	Exposures to regional governments, MDB, international organisations and PSE NOT treated as sovereigns	2,420	2,671	
EU-7	Institutions	21,558	30,697	
EU-8	Secured by mortgages of immovable properties	6,179,991	5,585,622	
EU-9	Retail exposures	1,173,363	1,164,262	
EU-10	Corporate	1,025,812	1,004,238	
EU-11	Exposures in default	56,135	48,507	
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	673,646	741,052	

## Free format text boxes for disclosure on qualitative items

1	Description of the processes used to manage the risk of excessive leverage	The risk of excessive leverage is managed as part of the capital management process. The development of the leverage ratio is estimated based on the Group's business plan and stress scenarios. The expected development of the leverage ratio is taken into account when setting the target and threshold levels for capital adequacy.
2	Description of the factors that had an impact on the leverage Ratio during the period to which the disclosed leverage Ratio refers 16.2.2016 L 39/12 Official Journal of the European Union EN	Loans and advances to customers grew relatively more than tier 1 capital resulting in a weakening of the leverage ratio.

# NOTE 15: INSTITUTION-SPECIFIC COUNTERCYCLICAL CAPITAL BUFFER REQUIREMENT

Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer

(EUR 1,000) 31.12.2018	General credit	exposures	Trading book expo	sure	Securitisation	exposure	Own funds	requirements				
	Exposure value for SA	Exposure value for IRB	Sum of long and short position of trading book	Value of trading book exposure for internal models	Exposure value for SA	Exposure value for IRB	Of which: General credit risk exposures	Of which: Trading book exposures	Of which: Sequritisation exposures	Total	Own funds requirement weights, %	Countercyclical capital buffer rate, %
Breakdown by country												
Finland	9,957,007						355,566			355,566	92.9%	0.00%
Sweden	62,545						4,042			4,042	1.1%	2.00%
Norway	18,927						705			705	0.2%	2.00%
Island	113						3			3	0.0%	1.25%
Slovakia	17										0.0%	1.25%
Britain	14,468						744			744	0.2%	1.00%
Czech republic	11										0.0%	1.00%
Other	291,678						21,509			21,509	5.6%	0.00%
Total	10,344,766						382,569			382,569	100.0%	

## Amount of institution-specific countercyclical capital buffer

(EUR 1,000)	31.12.2018
Total risk exposure amount	5,385,564
Institution specific countercyclical buffer rate, %	0.03%
Institution specific countercyclical buffer requirement	1,528

## Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer

(EUR 1,000) 31.12.2017	General credit	exposures	Trading book expo	sure	Securitisation	exposure	Own funds	s requirements				
	Exposure value for SA	Exposure value for IRB	Sum of long and short position of trading book	Value of trading book exposure for internal models	Exposure value for SA	Exposure value for IRB	Of which: General credit risk exposures	Of which: Trading book exposures	Of which: Sequritisation exposures	Total	Own funds requirement weights, %	Countercyclical capital buffer rate, %
Breakdown by country												
Finland	9,276,951						339,251			339,251	92.9%	0.00%
Sweden	45,085						3,056			3,056	0.8%	2.00%
Norway	12,663						540			540	0.1%	1.50%
Island	17										0.0%	1.25%
Other	302,099						22,171			22,171	6.1%	0.00%
Total	9,636,814						365,018			365,018	100.0%	

## Amount of institution-specific countercyclical capital buffer\*

(EUR 1,000)	31.12.2017
Total risk exposure amount	5,165,694
Institution specific countercyclical buffer rate, %	0.02%
Institution specific countercyclical buffer requirement	1,153

<sup>\*</sup>The figures for 2017 have been corrected.

# **NOTE 16: LIQUIDITY COVERAGE RATIO**

## LCR disclosure template on quantitative information of LCR

Amalgamation (EUR 1,000) 31.12.2018			Avera	ıge	
Quarter ending on		31.12.2018	30.9.2018	30.6.2018	31.3.2018
Number of data points used in the calculation of averages		12	12	12	12
			Total adjust	ed value	
21	Liquidity buffer	977	1,052	1,056	1,041
22	Total net cash outflows	603	642	645	646
23	Liquidity coverage ratio (%)	164%	167%	166%	164%

Amalgamation (EUR 1,000) 31.12.2017		Avera	ge
Quarter ending on		31.12.2017	30.9.2017
Number of data points used in the calculation of averages		12	12
		Total adjust	ed value
21	Liquidity buffer	1,055	1,029
22	Total net cash outflows	646	600
23	Liquidity coverage ratio (%)	165%	173%

## Template on qualitative information on LCR

Concentration of funding and liquidity sources	The most significant source of funding for the Amalgamation is retail deposits. The most important sources of wholesale funding are bond issues under the Central Bank of Savings Banks Plc's EMTN programme and covered bond issues under the Sp Mortgage Bank Plc's Covered Bond programme.
Derivative exposures and potential collateral calls	Derivatives are used only for hedging purposes. Outflows from additional collateral needs due to a material deterioration in own credit quality or an adverse market scenario constituted less than 1% of the Amalgamation's net liquidity outflows at the end of the year 2018.
Currency mismatch in the LCR	The Amalgamation's business is conducted in euros and there is no currency mismatch in LCR.
A description of the degree of centralisation of liquidity management and interaction between the group's units	The Central Bank of The Savings Banks is responsible for the Amalgamation's intraday and daily liquidity management and monitoring.
Other items in the LCR calculation that are not captured in the LCR disclosure template but that the institution considers relevant for its liquidity profile	The Amalgamation's outflows consist mainly of those due to retail deposits and non-operational deposits. Individual bonds issued by the Amalgamation may be large enough to significantly increase the Amalgamation's outflows when they mature. Inflows consist mainly of loan amortization and interest payments as well as maturing investments, but inflows are not large relative to outflows.

Strategies and processes in the management of the liquidity risk	Liquidity risk is managed by ensuring that the Amalgamation's funding comes from stable sources such as retail deposits and long-term wholesale funding. In addition a variety of different funding sources are kept open so that they would be available in case of a liquidity crisis. Uncollateralized wholesale funding is done through Central Bank of Savings Banks, which issues both long-term bonds and short-term CD's and money market deposits to domestic and foreign institutional investors. Savings banks issue retail bonds that qualify as Tier 2 capital. Sp Mortgage Bank issues covered bonds, which are a natural funding tool for the Amalgamation given that the Amalgamation's loan book consists mainly of housing loans.
Structure and organisation of the liquidity risk management function (authority, statute, other arrangements)	Central Bank of Savings Banks manages the Amalgamations payments. Central Bank's Treasury is responsible for the operational management of the Amalgamation's liquidity risk strategy on the Amalgamation level. Treasury is responsible for the operational upkeep and testing of the Amalgamation's liquidity contingency plan. Treasury is responsible for the daily management of the Amalgamation's liquidity buffer. To improve liquidity management in the Amalgamation the Savings Banks and Central Bank have signed an agreement on the use of liquid assets that ensures Treasury has no legal or practical impediments in using them. Treasury drafts the annual funding plan for the approval of the Board of Directors of the Central Institution. Central Bank's Asset and Liability Management unit drafts the Amalgamation's liquidity risk strategy and the liquidity contingency plan.
Policies for hedging and mitigating the liquidity risk and strategies and processes for monitoring the continuing effectiveness of hedges and mitigants	The measuring and monitoring of liquidity risk is based on the Central Bank's treasury system, which holds data on a contractual level from the loan and deposit core systems as well as data on derivatives and the investment portfolio. Treasury system has the portfolio, organizational and limit structures necessary for the measurement of market, interest and liquidity risk.
A declaration approved by the management body on the adequacy of liquidity risk management arrangements of the institution providing assurance that the liquidity risk management systems put in place are adequate with regard to the institution's profile and strategy	The Board of Directors of the Central Institution assures that the liquidity risk management systems put in place are adequate with regard to the Amalgamation's profile and strategy.
A concise liquidity risk statement approved by the management body succinctly describing the institution's overall liquidity risk profile associated with the business strategy.	The Amalgamation's business is retail banking where deposits are used to fund loans to customers. Deposit funding is supplemented with wholesale funding, both collateralized and uncollateralized. The Amalgamation's liquidity buffer consists of extremely high quality liquid assets and the buffer's size is sufficient to cover a short-term liquidity crisis as well as a longer term wholesale market disruption.

## **NOTE 17: READER'S MANUAL**

REGULATION (EU) No 575/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 26 June 2013 ( <code>TITLE 2: TECHNICAL CRITERIA ON TRANSPARENCY AND DISCLOSURE)</code>

Regulation	Disclosure requirement	Reference to publication
CRR article 435.1	Risk management objectives and policies	
a	the strategies and processes to manage those risks;	Financial statement's note 5: Risk management and capital adequacy management
b	the structure and organisation of the relevant risk management function including information on its authority and statute, or other appropriate arrangements;	Financial statement's note 4: Corporate Governance Policies and financial statement's note 5: Risk management and capital adequacy management
С	the scope and nature of risk reporting and measurement systems;	Financial statement's note 5: Risk management and capital adequacy management
d	the policies for hedging and mitigating risk, and the strategies and processes for monitoring the continuing effectiveness of hedges and mitigants;	Financial statement's note 5: Risk management and capital adequacy management
е	a declaration approved by the management body on the adequacy of risk management arrangements of the institution providing assurance that the risk management systems put in place are adequate with regard to the institution's profile and strategy; EN 27.6.2013 Official Journal of the European Union L 176/	Pillar III report
f	a concise risk statement approved by the management body succinctly describing the institution's overall risk profile associated with the business strategy. This statement shall include key ratios and figures providing external stakeholders with a comprehensive view of the institution's management of risk, including how the risk profile of the institution interacts with the risk tolerance set by the management body.	Pillar III report

# $EBA/GL/2017/01\ Guidelines\ on\ LCR\ disclosure\ to\ complement\ the\ disclosure\ of\ liquidity\ risk\ management\ under\ Article\ 435\ of\ Regulation\ (EU)\ No\ 575/2013$

Paragraph 12	The credit institutions referred to in paragraph 7 should disclose the table provided in Annex I.	Pillar III report (with the exemption described in paragraph 14)
Paragraph 13	The credit institutions referred to in paragraph 7 should disclose the LCR disclosure template and the template on qualitative information on the LCR provided in Annex II in accordance with the instructions provided in Annex III.	Pillar III report
Paragraph 14	By way of derogation from paragraph 13, a credit institution should disclose only the information in rows 21, 22 and 23 of the LCR disclosure template in Annex II where all of the following conditions are met:	Pillar III report (Rows 21, 22 and 23 of the LCR disclosure template in Annex II and qualitative information according to Annex III)
	(a) the credit institution has not been identified by competent authorities as a global systemically important institution (G-SII) in accordance with Commission Delegated Regulation (EU) No 1222/2014 and any subsequent amendment;	
	(b) the credit institution has not been identified as an other systemically important institution (O-SII) in application of Article 131 (3) of Directive 2013/36/EU as specified by EBA/GL/2014/10.	
CRR article 435.2	Information on governance arrangements	
a	the number of directorships held by members of the management body;	Financial statement of the Savings Banks Group
b	the recruitment policy for the selection of members of the management body and their actual knowledge, skills and expertise;	Financial statement's note 4: Corporate Governance Policies
С	the policy on diversity with regard to selection of members of the management body, its objectives and any relevant targets set out in that policy, and the extent to which these objectives and targets have been achieved;	Financial statement's note 4: Corporate Governance Policies
d	whether or not the institution has set up a separate risk committee and the number of times the risk committee has met;	Financial statement's note 5: Risk management and capital adequacy management

е	the description of the information flow on risk to the management body	Financial statement's note 5: Risk management and capital adequacy management
EBA GL 2016 11	Section C: information on governance arrangements	Financial statement's note 4: Corporate Governance Policies and note 5: Risk management and capital adequacy management
CRR article 436	Scope of application	
a	the name of the institution to which the requirements of this Regulation apply; $ \\$	Pillar III report
b	an outline of the differences in the basis of consolidation for accounting and prudential purposes, with a brief description of the entities therein, explaining whether they are:	Financial statement's note 1: Description of the Savings Banks Group and the Savings Banks Amalgamation, note 2: Accounting policies and note 43: Entities consolidated in Savings Banks Group's financial statements
	(i) fully consolidated;	
	(ii) proportionally consolidated;	
	(iii) deducted from own funds;	
	(iv) neither consolidated nor deducted;	
С	any current or foreseen material practical or legal impediment to the prompt transfer of own funds or repayment of liabilities among the parent undertaking and its subsidiaries;	Not applicable
d	the aggregate amount by which the actual own funds are less than required in all subsidiaries not included in the consolidation, and the name or names of such subsidiaries;	Not applicable
е	if applicable, the circumstance of making use of the provisions laid down in Articles 7 and 9. $$	Not applicable
CRR article 437	Own funds	
a	a full reconciliation of Common Equity Tier 1 items, Additional Tier 1 items, Tier 2 items and filters and deductions applied pursuant to Articles 32 to 35, 36, 56, 66 and 79 to own funds of the institution and the balance sheet in the audited financial statements of the institution;	Pillar III report
b	a description of the main features of the Common Equity Tier 1 and Additional Tier 1 instruments and Tier 2 instruments issued by the institution;	Pillar III report
С	the full terms and conditions of all Common Equity Tier 1, Additional Tier 1 and Tier 2 instruments;	Pillar III report
d	separate disclosure of the nature and amounts of the following:	Pillar III report
	(i) each prudential filter applied pursuant to Articles 32 to 35;	
	(ii) each deduction made pursuant to Articles 36, 56 and 66;	
	(iii) items not deducted in accordance with Articles 47, 48, 56, 66 and 79;	
е	a description of all restrictions applied to the calculation of own funds in accordance with this Regulation and the instruments, prudential filters and deductions to which those restrictions apply;	Not applicable
f	where institutions disclose capital ratios calculated using elements of own funds determined on a basis other than that laid down in this Regulation, a comprehensive explanation of the basis on which those capital ratios are calculated.	Not applicable
EBA GL 2016/11 paragraph 67 (4.5)	Comission implementing regulation (EU) N:o 1423/2013 specifies uniform templates used in for disclosure under points (a), (b), (d) and e.	Pillar III report
CRR article 438	Capital requirements	
a	a summary of the institution's approach to assessing the adequacy of its internal capital to support current and future activities;	Financial statement's note 5: Risk management and capital adequacy management

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b	upon demand from the relevant competent authority, the result of the institution's internal capital adequacy assessment process including the composition of the additional own funds requirements based on the supervisory review process as referred to in point (a) of Article 104(1) of Directive 2013/36/EU;	Not applicable
С	for institutions calculating the risk-weighted exposure amounts in accordance with Chapter 2 of Part Three, Title II, 8% of the risk-weighted exposure amounts for each of the exposure classes specified in Article 112;	Pillar III report
d	for institutions calculating risk-weighted exposure amounts in accordance with Chapter 3 of Part Three, Title II, 8% of the risk-weighted exposure amounts for each of the exposure classes specified in Article 147. For the retail exposure class, this requirement applies to each of the categories of exposures to which the different correlations in Article 154(1) to (4) correspond. For the equity exposure class, this requirement applies to:	Not applicable
	(i) each of the approaches provided in Article 155;	
	(ii) exchange traded exposures, private equity exposures in sufficiently diversified portfolios, and other exposures;	
	(iii) exposures subject to supervisory transition regarding own funds requirements;	
	(iv) exposures subject to grandfathering provisions regarding own funds requirements;	
е	own funds requirements calculated in accordance with points (b) and (c) of Article $92(3)$ ;	Pillar III report
f	own funds requirements calculated in accordance with Part Three, Title III, Chapters 2, 3 and 4 and disclosed separately.	Pillar III report
CRR article 439	Exposure to counterparty credit risk	
a	a discussion of the methodology used to assign internal capital and credit limits for counterparty credit exposures;	Financial statement's note 5: Risk management and capital adequacy management
b	a discussion of policies for securing collateral and establishing credit reserves;	Financial statement's note 5: Risk management and capital adequacy management
С	a discussion of policies with respect to wrong-way risk exposures;	Not applicable
d	a discussion of the impact of the amount of collateral the institution would have to provide given a downgrade in its credit rating;	Not applicable
е	gross positive fair value of contracts, netting benefits, netted current credit exposure, collateral held and net derivatives credit exposure. Net derivatives credit exposure is the credit exposure on derivatives transactions after	Offsetting of financial assets
	considering both the benefits from legally enforceable netting agreements and collateral arrangements;	
f	considering both the benefits from legally enforceable netting agreements	Pillar III report
f g	considering both the benefits from legally enforceable netting agreements and collateral arrangements;  measures for exposure value under the methods set out in Part Three, Title	Pillar III report
	considering both the benefits from legally enforceable netting agreements and collateral arrangements;  measures for exposure value under the methods set out in Part Three, Title II, Chapter 6, Sections 3 to 6 whichever method is applicable;  the notional value of credit derivative hedges, and the distribution of current	Pillar III report  Not applicable
g	considering both the benefits from legally enforceable netting agreements and collateral arrangements;  measures for exposure value under the methods set out in Part Three, Title II, Chapter 6, Sections 3 to 6 whichever method is applicable;  the notional value of credit derivative hedges, and the distribution of current credit exposure by types of credit exposure;  the notional amounts of credit derivative transactions, segregated between use for the institution's own credit portfolio, as well as in its intermediation activities, including the distribution of the credit derivatives products used, broken down	Pillar III report  Not applicable  Not applicable
g h	considering both the benefits from legally enforceable netting agreements and collateral arrangements;  measures for exposure value under the methods set out in Part Three, Title II, Chapter 6, Sections 3 to 6 whichever method is applicable;  the notional value of credit derivative hedges, and the distribution of current credit exposure by types of credit exposure;  the notional amounts of credit derivative transactions, segregated between use for the institution's own credit portfolio, as well as in its intermediation activities, including the distribution of the credit derivatives products used, broken down further by protection bought and sold within each product group;  the estimate of if the institution has received the permission of the competent	Pillar III report  Not applicable  Not applicable
g h i	considering both the benefits from legally enforceable netting agreements and collateral arrangements;  measures for exposure value under the methods set out in Part Three, Title II, Chapter 6, Sections 3 to 6 whichever method is applicable;  the notional value of credit derivative hedges, and the distribution of current credit exposure by types of credit exposure;  the notional amounts of credit derivative transactions, segregated between use for the institution's own credit portfolio, as well as in its intermediation activities, including the distribution of the credit derivatives products used, broken down further by protection bought and sold within each product group;  the estimate of if the institution has received the permission of the competent authorities to estimate.	Pillar III report  Not applicable  Not applicable  Not applicable
g h i CRR article 440	considering both the benefits from legally enforceable netting agreements and collateral arrangements;  measures for exposure value under the methods set out in Part Three, Title II, Chapter 6, Sections 3 to 6 whichever method is applicable;  the notional value of credit derivative hedges, and the distribution of current credit exposure by types of credit exposure;  the notional amounts of credit derivative transactions, segregated between use for the institution's own credit portfolio, as well as in its intermediation activities, including the distribution of the credit derivatives products used, broken down further by protection bought and sold within each product group;  the estimate of if the institution has received the permission of the competent authorities to estimate.  Capital buffers  the geographical distribution of its credit exposures relevant for the calculation	Pillar III report  Not applicable  Not applicable  Not applicable
g h CRR article 440	considering both the benefits from legally enforceable netting agreements and collateral arrangements;  measures for exposure value under the methods set out in Part Three, Title II, Chapter 6, Sections 3 to 6 whichever method is applicable;  the notional value of credit derivative hedges, and the distribution of current credit exposure by types of credit exposure;  the notional amounts of credit derivative transactions, segregated between use for the institution's own credit portfolio, as well as in its intermediation activities, including the distribution of the credit derivatives products used, broken down further by protection bought and sold within each product group;  the estimate of if the institution has received the permission of the competent authorities to estimate.  Capital buffers  the geographical distribution of its credit exposures relevant for the calculation of its countercyclical capital buffer	Pillar III report  Not applicable  Not applicable  Not applicable  Pillar III report  Pillar III report
g h i CRR article 440 a b EBA GL 2016/11	considering both the benefits from legally enforceable netting agreements and collateral arrangements;  measures for exposure value under the methods set out in Part Three, Title II, Chapter 6, Sections 3 to 6 whichever method is applicable;  the notional value of credit derivative hedges, and the distribution of current credit exposure by types of credit exposure;  the notional amounts of credit derivative transactions, segregated between use for the institution's own credit portfolio, as well as in its intermediation activities, including the distribution of the credit derivatives products used, broken down further by protection bought and sold within each product group;  the estimate of if the institution has received the permission of the competent authorities to estimate.  Capital buffers  the geographical distribution of its credit exposures relevant for the calculation of its countercyclical capital buffer  the amount of its institution specific countercyclical capital buffer  CRR article 440 disclosure requirements are specified in comission delegated	Pillar III report  Not applicable  Not applicable  Not applicable  Pillar III report  Pillar III report
g h CRR article 440 a b EBA GL 2016/11 paragraf 72 (4.7)	considering both the benefits from legally enforceable netting agreements and collateral arrangements;  measures for exposure value under the methods set out in Part Three, Title II, Chapter 6, Sections 3 to 6 whichever method is applicable;  the notional value of credit derivative hedges, and the distribution of current credit exposure by types of credit exposure;  the notional amounts of credit derivative transactions, segregated between use for the institution's own credit portfolio, as well as in its intermediation activities, including the distribution of the credit derivatives products used, broken down further by protection bought and sold within each product group;  the estimate of if the institution has received the permission of the competent authorities to estimate.  Capital buffers  the geographical distribution of its credit exposures relevant for the calculation of its countercyclical capital buffer  the amount of its institution specific countercyclical capital buffer  CRR article 440 disclosure requirements are specified in comission delegated regulation (EU) N:o 2015/1555.	Pillar III report  Not applicable  Not applicable  Not applicable  Pillar III report  Pillar III report

CRR article 442	Credit risk adjustments	
a	the definitions for accounting purposes of 'past due' and 'impaired';	Financial statements note 2: Accounting policies
b	a description of the approaches and methods adopted for determining specific and general credit risk adjustments;	Financial statement's note 5: Risk management and capital adequacy management
С	the total amount of exposures after accounting offsets and without taking into account the effects of credit risk mitigation, and the average amount of the exposures over the period broken down by different types of exposure classes;	Pillar III report
d	the geographic distribution of the exposures, broken down in significant areas by material exposure classes, and further detailed if appropriate;	Pillar III report
е	the distribution of the exposures by industry or counterparty type, broken down by exposure classes, including specifying exposure to SMEs, and further detailed if appropriate;	Pillar III report
f	the residual maturity breakdown of all the exposures, broken down by exposure classes, and further detailed if appropriate;	Pillar III report
g	by significant industry or counterparty type, the amount of:	Financial statement's note 17: Impairment loss on loans and other receivables; Financial statements note 22: Loans and receivables; Financial statement's note 5: Risk management and capital adequacy management; Information on industry level is not published due to confidentiality
	(i) impaired exposures and past due exposures, provided separately;	
	(ii) specific and general credit risk adjustments;	
	(iii) charges for specific and general credit risk adjustments during the reporting period;	
h	the amount of the impaired exposures and past due exposures, provided separately, broken down by significant geographical areas including, if practical, the amounts of specific and general credit risk adjustments related to each geographical area;	Not applicable
i	the reconciliation of changes in the specific and general credit risk adjustments for impaired exposures, shown separately. The information shall comprise:	Financial statement's note 17: Impairment loss on loans and other receivables; Financial statements note 22: Loans and receivables; Financial statement's note 5: Risk management and capital adequacy management;
	(i) a description of the type of specific and general credit risk adjustments;	
	(ii) the opening balances;	
	(iii) the amounts taken against the credit risk adjustments during the reporting period;	
	(iv) the amounts set aside or reversed for estimated probable losses on exposures during the reporting period, any other adjustments including those determined by exchange rate differences, business combinations, acquisitions and disposals of subsidiaries, and transfers between credit risk adjustments;	
	(v) the closing balances.	
CRR article 443	Unencumbered assets	
RTS 2017/2295	$Comission\ delegated\ regulation\ (EU)\ 2017/2295\ specifies\ disclosure\ requirements.$	Pillar III report
CRR article 444	Use of External Credit Agencies (ECAIs)	
a	the names of the nominated ECAIs and ECAs and the reasons for any changes;	Savings Bank Amalgamation uses external credit ratings provided by Moody's and Standard & Poor's in credit risk capital requirement calculation.

b	the exposure classes for which each ECAI or ECA is used;	Savings Bank Amalgamation uses external ratings for following exposure classes: Exposures to central governments or central banks, exposures to corporates and exposures in the form of units or shares in collective investment undertakings (CIUs).
С	a description of the process used to transfer the issuer and issue credit assessments onto items not included in the trading book;	Savings Bank Amalgamation uses external ratings, if external rating provided by Standard & Poor's or Moody's is available.
d	the association of the external rating of each nominated ECAI or ECA with the credit quality steps prescribed in Part Three, Title II, Chapter 2, taking into account that this information needs not be disclosed if the institution complies with the standard association published by EBA;	Not applicable
е	the exposure values and the exposure values after credit risk mitigation associated with each credit quality step prescribed in Part Three, Title II, Chapter 2 as well as those deducted from own funds.	Pillar III report
CRR article 445	Market risks	
	The institutions calculating their own funds requirements in accordance with points (b) and (c) of Article 92(3) shall disclose those requirements separately for each risk referred to in those provisions. In addition, the own funds requirement for specific interest rate risk of securitisation positions shall be disclosed separately.	Pillar III report
CRR article 446	Operational risks	
	Institutions shall disclose the approaches for the assessment of own funds requirements for operational risk that the institution qualifies for; a description of the methodology set out in Article 312(2), if used by the institution, including a discussion of relevant internal and external factors considered in the institution's measurement approach, and in the case of partial use, the scope and coverage of the different methodologies used.	Pillar III report
CRR article 447	Exposures in equities not included to the trading book	
a	the differentiation between exposures based on their objectives, including for capital gains relationship and strategic reasons, and an overview of the accounting techniques and valuation methodologies used, including key assumptions and practices affecting valuation and any significant changes in these practices;	Financial statement's note 42: Fair values by valuation technique
b	the balance sheet value, the fair value and, for those exchange-traded, a comparison to the market price where it is materially different from the fair value;	Financial statement's note 5: Risk management and capital adequacy management
С	the types, nature and amounts of exchange-traded exposures, private equity exposures in sufficiently diversified portfolios, and other exposures;	Financial statement's note 5: Risk management and capital adequacy management
d	the cumulative realised gains or losses arising from sales and liquidations in the period; and	Financial statement's note 10: Net investment income
е	the total unrealised gains or losses, the total latent revaluation gains or losses, and any of these amounts included in the original or additional own funds.	Financial statement's 38: Capital and reserves
CRR article 448	Exposure to interest rate risk on positions not included in the trading book	
a	the nature of the interest rate risk and the key assumptions (including assumptions regarding loan prepayments and behaviour of non-maturity deposits), and frequency of measurement of the interest rate risk;	Financial statement's note 5: Risk management and capital adequacy management
Ь	the variation in earnings, economic value or other relevant measure used by the management for upward and downward rate shocks according to management's method for measuring the interest rate risk, broken down by currency.	Financial statement's note 5: Risk management and capital adequacy management
CRR article 449	Exposure to securitisation positions	
	Savings banks amalgamation does not have securitisation positions.	Not applicable

CRR article 450	Remunation policy	
a	information concerning the decision-making process used for determining the remuneration policy, as well as the number of meetings held by the main body overseeing remuneration during the financial year, including, if applicable, information about the composition and the mandate of a remuneration committee, the external consultant whose services have been used for the determination of the remuneration policy and the role of the relevant stakeholders;	Financial statement's note 4: Corporate governance policies
b	information on link between pay and performance;	Financial statement's note 4: Corporate governance policies; and note 14: Personnel expences
С	the most important design characteristics of the remuneration system, including information on the criteria used for performance measurement and risk adjustment, deferral policy and vesting criteria;	Financial statement's note 4: Corporate governance policies
d	the ratios between fixed and variable remuneration set in accordance with Article 94(1)(g) of Directive 2013/36/EU;	Financial statement's note 4: Corporate governance policies
е	information on the performance criteria on which the entitlement to shares, options or variable components of remuneration is based;	Financial statement's note 4: Corporate governance policies
f	the main parameters and rationale for any variable component scheme and any other non-cash benefits;	Financial statement's note 4: Corporate governance policies
g	aggregate quantitative information on remuneration, broken down by business area; $ \\$	Financial statement's note 6: Operating segments
h	aggregate quantitative information on remuneration, broken down by senior management and members of staff whose actions have a material impact on the risk profile of the institution, indicating the following:	Financial statement's note 14: Personnel expences and other income statement's notes
	(i) the amounts of remuneration for the financial year, split into fixed and variable remuneration, and the number of beneficiaries;	
	(ii) the amounts and forms of variable remuneration, split into cash, shares, share-linked instruments and other types;	
	(iii) the amounts of outstanding deferred remuneration, split into vested and unvested portions;	
	(iv) the amounts of deferred remuneration awarded during the financial year, paid out and reduced through performance adjustments;	
	(v) new sign-on and severance payments made during the financial year, and the number of beneficiaries of such payments;	
	(vi) the amounts of severance payments awarded during the financial year, number of beneficiaries and highest such award to a single person;	
i	the number of individuals being remunerated EUR 1 million or more per financial year, for remuneration between EUR 1 million and EUR 5 million broken down into pay bands of EUR 500,000 and for remuneration of EUR 5 million and above broken down into pay bands of EUR 1 million;	Not applicable
j	(j) upon demand from the Member State or competent authority, the total remuneration for each member of the management body or senior management.	Not applicable
EBA GL 2016/11 paragraf 133 (4.14)	EBA 2015/22 GL	Financial statement's note 4: Corporate governance policies
CRR article 451	Leverage ratio	
a	the leverage ratio and how the institution applies Article 499(2) and (3);	Pillar III report ja Financial statement's note 5: Risk management and capital adequacy management
b	a breakdown of the total exposure measure as well as a reconciliation of the total exposure measure with the relevant information disclosed in published financial statements;	Pillar III report
С	where applicable, the amount of derecognised fiduciary items in accordance with Article 429(11);	Pillar III report

d	a description of the processes used to manage the risk of excessive leverage;	Pillar III report and financial statement's note 5: Risk management and capital adequacy management
е	a description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers.	Pillar III report
EBA GL 2016/11 paragraf 134 (4.15)	Leverage ratio disclosure requirements are specified in comission implementing regulation (EU) N:o 2016/200.	Pillar III report
CRR article 452	Use of the IRB Approach to credit risk	
	Savings banks amalgamation is not using IRB to credit risk.	Not applicable
CRR article 453	Use of credit risk mitigation techniques	
a	extent to which the entity makes use of, on- and off- balance sheet netting;	Financial statements note 39: Classification of financial assets and financial liabilities
b	the policies and processes for collateral valuation and management;	Financial statement's note 5: Risk management and capital adequacy management
С	a description of the main types of collateral taken by the institution;	Pillar III report
d	the main types of guarantor and credit derivative counterparty and their creditworthiness;	Pillar III report
е	information about market or credit risk concentrations within the credit mitigation taken;	Pillar III report
f	for institutions calculating risk-weighted exposure amounts under the Standardised Approach or the IRB Approach, but not providing own estimates of LGDs or conversion factors in respect of the exposure class, separately for each exposure class, the total exposure value (after, where applicable, on- or off-balance sheet netting) that is covered — after the application of volatility adjustments — by eligible financial collateral, and other eligible collateral;	Pillar III report
g	for institutions calculating risk-weighted exposure amounts under the Standardised Approach or the IRB Approach, separately for each exposure class, the total exposure (after, where applicable, on- or off-balance sheet netting) that is covered by guarantees or credit derivatives. For the equity exposure class, this requirement applies to each of the approaches provided in Article 155.	Pillar III report
CRR article 454	Use of the Advanced Measurement Approaches to operational risk	
	Savings banks amalgamation is not using advanced measurement approaches to operational risk.	Not applicable
CRR article 455	Use of Internal Market Risk Models	
Ortif di tiole 400		

