



**SAVINGS BANKS AMALGAMATION'S**  
Pillar 3 Disclosure Report 2020

# SAVINGS BANKS AMALGAMATION'S PILLAR 3 DISCLOSURE REPORT 2020

## Table of contents

<b>Introduction</b>	<b>3</b>
<b>Declaration approved by the Board of Directors of Savings Bank Amalgamation</b>	<b>4</b>
<b>Pillar III disclosure principles</b>	<b>5</b>
Note 1: Summary of Regulatory Capital, RWA and Capital ratios	6
Note 2: Own funds disclosure template	7
Note 3: Issued Tier 2 (T2) instruments recognised in regulatory capital	15
Note 4: Reconciliation of Own Funds	27
Note 5: Minimum capital requirement	27
Note 6: Total exposure	28
Note 7: Credit risk exposures by risk weights	29
Note 8: Credit risk exposures by maturity	30
Note 9: Credit risk exposures by business segments	32
Note 10: Guarantees taken into account in the capital adequacy calculations	34
Note 11: The geographical distribution of relevant credit exposures	36
Note 12: Asset encumbrance	38
Note 13: Operational risk	43
Note 14: Leverage ratio	44
Note 15: Institution-specific countercyclical capital buffer requirement	47
Note 16: Liquidity coverage ratio	49
Note 17: Credit quality of forborne exposures	51
Note 18: Credit quality of performing and non-performing exposures by past due days	53
Note 19: Performing and non-performing exposures and related provisions	55
Note 20: Collateral obtained by taking possession and execution processes	57
Note 21: Reader's manual	58

## Introduction

The Amalgamation comprises the Savings Banks' Union Coop, which acts as the Central Institution of the Amalgamation, 18 Savings Banks, the Central Bank of Savings Banks Finland Plc, Sp Mortgage Bank as well the companies within the consolidation groups of the above-mentioned entities, Savings Bank Services Ltd and Sp- Fund Management Company Ltd Plc. 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, liquidity coverage ratio, credit quality of forborne and non-performing exposures of the amalgamation as specified in Capital Requirements Regulation

of the European Parliament and Council No. 573/2013 (CRR) (Pillar III disclosures). The note Reader's Manual provides an overview of the location of the required Pillar 3 disclosures either in this Pillar 3 Report or in the Savings Banks Group's Financial Statement.

The amalgamation does not apply the transitional arrangements specified in Article 473a of CRR. Own funds, capital and leverage ratios already reflect the full impact of IFRS 9 or analogous ECLs. The amalgamation does not apply the temporary treatment specified in Article 468 of CRR. Own funds, capital and leverage ratios already reflect the full impact of unrealised gains and losses measured at fair value through other comprehensive income.

The report is unaudited.

## Declaration approved by the Board of Directors of Savings Bank Amalgamation

According to section 435(1) of the Capital Requirements Regulation (CRR), Savings Bank 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 to 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 Bank Amalgamation

The basic objective of the Savings Banks is to promote thrift, the financial well-being of their customers and to operate 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 2020 the Amalgamation held 1,550 (1,003) million euros (before haircuts) of LCR eligible liquid assets. The Amalgamation's LCR was 196 % (148 %) at the end of 2020. On January 22nd 2021, S&P Global Ratings affirmed the long and short term ratings A-/A-2 on the Central Bank of Savings Banks. The outlook remained negative.

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 2020, the CET1 capital ratio of the Savings Banks Amalgamation was 19.0% (18.8%) and the capital ratio was 19.1% (19.1%). The capital structure of the Savings Banks Amalgamation is strong, and it significantly exceeded the regulatory capital requirement, which was 11.76% (12.05%) of the total amount of risk-weighted exposures at the end of 2020. 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 15 February 2021

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

---

**Pirkko Ahonen**  
Chairman of the Board

---

**Jari Oivo**  
Vice Chairman of the Board

---

**Ulf Sjöblom**

---

**Tuula Heikkinen**

---

**Eero Laesterä**

---

**Katarina Segerståhl**

---

**Heikki Paasonen**

---

**Jaakko Ossa**

## Pillar III disclosure principles

The Amalgamation's Pillar III disclosure principles has been established in accordance with the effective legislation and authorities' regulations and also taking into account the Amalgamation' 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 3-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)	31.12.2020	31.12.2019
Common Equity Tier 1 (CET1) capital before regulatory adjustments	1,115,019	1,066,603
Total regulatory adjustments to Common Equity Tier 1 (CET1)	-45,441	-37,970
<b>Common Equity Tier 1 (CET1) capital</b>	<b>1,069,578</b>	<b>1,028,632</b>
Additional Tier 1 (AT1) capital before regulatory adjustments		
Total regulatory adjustments to Additional Tier 1 (AT1) capital		
<b>Additional Tier 1 (AT1) capital</b>		
<b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>1,069,578</b>	<b>1,028,632</b>
Tier 2 (T2) capital before regulatory adjustments	6,089	15,352
Total regulatory adjustments to Tier 2 (T2) capital		
<b>Tier 2 (T2) capital</b>	<b>6,089</b>	<b>15,352</b>
<b>Total capital (TC = T1 + T2)</b>	<b>1,075,667</b>	<b>1,043,985</b>
<b>Risk weighted assets</b>	<b>5,638,817</b>	<b>5,475,985</b>
of which: credit and counterparty risk	4,980,108	4,845,471
of which: credit valuation adjustment (CVA)	111,723	101,758
of which: market risk	29,883	28,824
of which: operational risk	517,102	499,932
Common Equity Tier 1 (as a percentage of total risk exposure amount)	19.0 %	18.8 %
Tier 1 (as a percentage of total risk exposure amount)	19.0 %	18.8 %
Total capital (as a percentage of total risk exposure amount)	19.1 %	19.1 %
<b>Capital requirement</b>		
Omat varat yhteensä	1,075,667	1,043,985
Capital requirement total*	663,015	659,725
of which: Pillar 2 additional capital requirement	70,485	27,380
Capital buffer	412,652	384,260

\*The capital requirement at the end of 2020 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, 1.25 % Pillar 2 requirement set by the Financial Supervisory Authority and the country-specific countercyclical capital requirements of foreign exposures.

## NOTE 2: OWN FUNDS DISCLOSURE TEMPLATE

31.12.2020 (EUR 1,000)			
EBA		(A) AMOUNT AT DISCLOSURE DATE	(B) REGULATION (EU) No 575/2013 ARTICLE REFERENCE
	<b>Common Equity Tier 1 (CET1) capital: instruments and reserves</b>		
1	Capital instruments and the related share premium accounts	57,777	26 (1), 27, 28, 29
	of which: Ordinary shares	25,313	EBA list 26 (3)
	of which: Primary capital	32,452	
	of which: Share premium	12	
2	Retained earnings	742,566	26 (1) (c)
3	Accumulated other comprehensive income (and other reserves)	266,412	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
5a	Independently reviewed interim profits net of any foreseeable charge or dividend	46,572	26 (2)
6	<b>Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>	<b>1,113,328</b>	
	<b>Common Equity Tier 1 (CET1) capital: regulatory adjustments</b>		
7	Additional value adjustments (negative amount)	-3,021	34, 105
8	Intangible assets (net of related tax liability) (negative amount)	-34,021	36 (1) (b), 37
10	Deferred tax assets that rely on 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)	-6,708	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
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 CET 1 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
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
20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institutions opts for the deduction alternative	36 (1) (k)
20b	of which: qualifying holdings outside the financial sector (negative amount)	36 (1) (k) (i), 89 to 91
20c	of which: securitisation positions (negative amount)	36 (1) (k) (ii), 243 (1) (b), 244 (1) (b), 258
20d	ow which: free deliveries (negative amount)	36 (1) (k) (iii), 379 (3)
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)
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) (a)
25b	Forseeable tax charges relating to CET1 items (negative amount)	36 (1) (a)
27	Qualifying AT1 deductions that exceeds the AT1 capital of the institution (negative amount)	36 (1) (j)
28	<b>Total regulatory adjustments to Common Equity Tier 1 (CET1)</b>	<b>-43,750</b>
29	<b>Common Equity Tier 1 (CET1) capital</b>	<b>1,069,578</b>
	<b>Additional Tier 1 (AT1) capital: instruments</b>	
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	<b>Additional Tier 1 (AT1) capital before regulatory adjustments</b>	
	<b>Additional Tier 1 (AT1) capital: regulatory adjustments</b>	
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
42	Qualifying T2 deductions that exceed the T2 capital of the institution (negative amount)		56 (e)
43	<b>Total regulatory adjustments to Additional Tier 1 (AT1) capital</b>		
44	<b>Additional Tier 1 (AT1) capital</b>		
45	<b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>1,069,578</b>	
	<b>Tier 2 (T2) capital: instruments and provisions</b>		
46	Capital instruments and the related share premium accounts	6,089	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)
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	<b>Tier 2 (T2) capital before regulatory adjustments</b>	<b>6,089</b>	
	<b>Tier 2 (T2) capital: regulatory adjustments</b>		
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
57	<b>Total regulatory adjustments to Tier 2 (T2) capital</b>		
58	<b>Tier 2 (T2) capital</b>	<b>6,089</b>	
59	<b>Total capital (TC = T1 + T2)</b>	<b>1,075,667</b>	
60	<b>Total risk weighted assets</b>	<b>5,638,817</b>	
	<b>Capital ratios and buffers</b>		
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	18.97	92 (2) (a)
62	Tier 1 (as a percentage of total risk exposure amount)	18.97	92 (2) (b)

63	Total capital (as a percentage of total risk exposure)	19.08	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)	7.00	CRD 128, 129, 130, 131, 133
65	of which: capital conservation buffer requirement	2.50	
66	of which: countercyclical buffer requirement	0.00	
67	of which: systemic risk buffer requirement	0.00	
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)	18.97	CRD 128
<b>Amounts below the threshold for deduction (before risk weighting)</b>			
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)	15,334	36 (1) (h), 45, 46 56 (c), 59, 60, 66 (c), 69, 70
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)	25,298	36 (1) (i), 45, 48
75	Deferred tax assets arising from temporary differences (amount below 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met)		36 (1) (c), 38, 48
<b>Applicable caps on the inclusion of provisions in Tier 2</b>			
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
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 out 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)

31.12.2019 (EUR 1,000)		(A) AMOUNT AT DISCLOSURE DATE	(B) REGULATION (EU) No 575/2013 ARTICLE REFERENCE
<b>EBA</b>			
<b>Common Equity Tier 1 (CET1) capital: instruments and reserves</b>			
1	Capital instruments and the related share premium accounts	54,661	26 (1), 27, 28, 29
	of which: Ordinary shares	20,202	EBA list 26 (3)
	of which: Primary capital	34,452	
	of which: Share premium	8	
2	Retained earnings	717,465	26 (1) (c)
3	Accumulated other comprehensive income (and other reserves)	229,688	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	62,905	26 (2)
6	<b>Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>	<b>1,064,718</b>	
<b>Common Equity Tier 1 (CET1) capital: regulatory adjustments</b>			
7	Additional value adjustments (negative amount)	-3,416	34, 105
8	Intangible assets (net of related tax liability) (negative amount)	-31,823	36 (1) (b), 37
10	Deferred tax assets that rely on 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)	-846	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
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 CET 1 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
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
20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institutions opts for the deduction alternative		36 (1) (k)
20b	of which: qualifying holdings outside the financial sector (negative amount)		36 (1) (k) (i), 89 to 91
20c	of which: securitisation positions (negative amount)		36 (1) (k) (ii), 243 (1) (b), 244 (1) (b), 258
20d	of which: free deliveries (negative amount)		36 (1) (k) (iii), 379 (3)
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)
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) (a)
25b	Forseeable tax charges relating to CET1 items (negative amount)		36 (1) (a)
27	Qualifying AT1 deductions that exceeds the AT1 capital of the institution (negative amount)		36 (1) (j)
28	<b>Total regulatory adjustments to Common Equity Tier 1 (CET1)</b>	<b>-36,086</b>	
29	<b>Common Equity Tier 1 (CET1) capital</b>	<b>1,028,632</b>	
	<b>Additional Tier 1 (AT1) capital: instruments</b>		
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 by subsidiaries and held by third parties		85, 86
35	of which: instruments issued by subsidiaries subject to phase out		486 (3)
36	<b>Additional Tier 1 (AT1) capital before regulatory adjustments:</b>		
	<b>Additional Tier 1 (AT1) capital: regulatory adjustments</b>		
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)		52 (1) (b), 56 (a), 57
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
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
42	Qualifying T2 deductions that exceed the T2 capital of the institution (negative amount)		56 (e)
43	<b>Total regulatory adjustments to Additional Tier 1 (AT1) capital</b>		
44	<b>Additional Tier 1 (AT1) capital</b>		
45	<b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>1,028,632</b>	
	<b>Tier 2 (T2) capital: instruments and provisions</b>		
46	Capital instruments and the related share premium accounts	15,352	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)
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	<b>Tier 2 (T2) capital before regulatory adjustments</b>	<b>15,352</b>	
	<b>Tier 2 (T2) capital: regulatory adjustments</b>		
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
57	<b>Total regulatory adjustments to Tier 2 (T2) capital</b>		
58	<b>Tier 2 (T2) capital</b>	<b>15,352</b>	
59	<b>Total capital (TC = T1 + T2)</b>	<b>1,043,985</b>	
60	<b>Total risk weighted assets</b>	<b>5,475,985</b>	
	<b>Capital ratios and buffers</b>		
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	18.78	92 (2) (a)
62	Tier 1 (as a percentage of total risk exposure amount)	18.78	92 (2) (b)

63	Total capital (as a percentage of total risk exposure)	19.06	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)	8.05	CRD 128, 129, 130, 131, 133
65	of which: capital conservation buffer requirement	2.50	
66	of which: countercyclical buffer requirement	0.05	
67	of which: systemic risk buffer requirement	1.00	
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)	18.78	CRD 128
<b>Amounts below the threshold for deduction (before risk weighting)</b>			
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)	15,445	36 (1) (h), 45, 46 56 (c), 59, 60, 66 (c), 69, 70
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
75	Deferred tax assets arising from temporary differences (amount below 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met)		36 (1) (c), 38, 48
<b>Applicable caps on the inclusion of provisions in Tier 2</b>			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)		62,00
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach		62,00
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)		62,00
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach		62,00
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 out 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)

## NOTE 3: CAPITAL INSTRUMENTS' MAIN FEATURES

The table below provides a list of issued capital instruments

31.12.2020 (EUR 1,000)						
Issuer	ISIN	Interest rate	Maturity	Amount recognised in regulatory capital	Balance sheet value	Instrument
<b>Own funds instruments included in CET1</b>						
Aito Säästöpankki Oy				5,195	5,195	Ordinary share
Ekenäs Sparbank				5,000	5,000	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
Säästöpankki Kalanti-Pyhäranta				2,725	2,725	Primary capital
Lammin Säästöpankki				9,327	9,327	Primary capital
Mietoisten Säästöpankki				1,000	1,000	Primary capital
Myrskylän Säästöpankki				7,000	7,000	Primary capital
Säästöpankki Sinetti				5,400	5,400	Primary capital
<b>Total</b>				<b>57,647</b>	<b>57,647</b>	

31.12.2020 (EUR 1,000)						
Issuer	ISIN	Interest rate	Maturity	Amount recognised in regulatory capital	Balance sheet value	Instrument
<b>Own funds instruments included in Tier 2</b>						
Aito Säästöpankki Oy	FI4000207030	1.500	23.8.21	643	5,000	Debenture
Avain Säästöpankki	FI4000201504	2.250	15.8.21	249	2,000	Debenture
Avain Säästöpankki	FI4000257449	2.100	15.10.22	715	2,000	Debenture
Liedon Säästöpankki	FI4000176474	2.000	17.2.21	89	3,390	Debenture
Liedon Säästöpankki	FI4000201645	2.000	18.8.21	295	2,344	Debenture
Liedon Säästöpankki	FI4000223946	2.000	21.2.22	830	3,634	Debenture
Liedon Säästöpankki	FI4000252200	2.000	22.8.22	473	1,443	Debenture
Myrskylän Säästöpankki	FI4000288394	2.000	1.2.23	581	1,393	Debenture
Nooa Säästöpankki Oy	FI4000201520	1.000	20.7.21	158	1,433	Debenture
Nooa Säästöpankki Oy	FI4000220165	1.500	20.12.21	315	1,626	Debenture
Nooa Säästöpankki Oy	FI4000251988	1.500	18.7.22	219	708	Debenture
Nooa Säästöpankki Oy	FI4000282975	1.000	11.1.23	270	665	Debenture
Ylihärmän Säästöpankki	FI4000257449	2.100	15.10.22	1,252	3,500	Debenture
<b>Total</b>				<b>6,089</b>	<b>29,136</b>	<b>Debenture</b>

31.12.2019 (EUR 1,000)						
Issuer	ISIN	Interest rate	Maturity	Amount recognised in regulatory capital	Balance sheet value	Instrument
<b>Own funds instruments included in CET1</b>						
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
Säästöpankki Kalanti-Pyhäranta				2,725	2,725	Primary capital
Lammin Säästöpankki				9,327	9,327	Primary capital
Mietoisten Säästöpankki				1,000	1,000	Primary capital
Myrskylän Säästöpankki				7,000	7,000	Primary capital
Sysmän Säästöpankki				2,000	2,000	Primary capital
Säästöpankki Sinetti				5,400	5,400	Primary capital
<b>Total</b>				<b>54,647</b>	<b>54,647</b>	

31.12.2019 (EUR 1,000)						
Issuer	ISIN	Interest rate	Maturity	Amount recognised in regulatory capital	Balance sheet value	Instrument
<b>Own funds instruments included in Tier 2</b>						
Aito Säästöpankki Oy	FI4000207030	1.500	23.8.21	1,646	5,000	Debenture
Aito Säästöpankki Oy	FI4000153903	2.000	25.8.20	652	5,000	Debenture
Avain Säästöpankki	FI4000257449	2.100	15.10.22	1,116	2,000	Debenture
Avain Säästöpankki	FI4000153622	2.250	15.10.20	317	2,000	Debenture
Avain Säästöpankki	FI4000201504	2.250	15.8.21	650	2,000	Debenture
Eurajoen Säästöpankki	FI4000157169	2.600	30.11.20	658	3,584	Debenture
Helmi Säästöpankki Oy	FI4000157516	2.000	22.10.20	286	1,762	Debenture
Liedon Säästöpankki	FI4000153630	2.000	18.8.20	227	1,791	Debenture
Liedon Säästöpankki	FI4000176474	2.000	17.2.21	769	3,390	Debenture
Liedon Säästöpankki	FI4000201645	2.000	18.8.21	765	2,344	Debenture
Liedon Säästöpankki	FI4000223946	2.000	21.2.22	1,558	3,634	Debenture
Liedon Säästöpankki	FI4000252200	2.000	22.8.22	763	1,443	Debenture
Myrskylän Säästöpankki	FI4000157482	2.100	26.10.20	133	812	Debenture
Myrskylän Säästöpankki	FI4000288394	2.000	1.2.23	861	1,393	Debenture
Nooa Säästöpankki Oy	FI4000220165	1.500	20.12.21	641	1,626	Debenture
Nooa Säästöpankki Oy	FI4000153523	1.250	4.8.20	170	1,428	Debenture
Nooa Säästöpankki Oy	FI4000170626	1.000	21.12.20	586	3,007	Debenture
Nooa Säästöpankki Oy	FI4000201520	1.000	20.7.21	445	1,433	Debenture
Nooa Säästöpankki Oy	FI4000282975	1.500	11.1.23	403	665	Debenture
Nooa Säästöpankki Oy	FI4000251988	1.500	18.7.22	361	708	Debenture
Ylihärmän Säästöpankki	FI4000257449	2.100	15.10.22	1,953	3,500	Debenture
Ylihärmän Säästöpankki	FI4000153622	2.250	15.10.20	396	2,500	Debenture
<b>Total</b>				<b>15,352</b>	<b>51,020</b>	<b>Debenture</b>

Commission implementing regulation (EU) No 1423/2013	31.12.2020 (EUR 1,000)								
1	Issuer	Aito Säästöpankki Oy	Avain Säästöpankki	Avain Säästöpankki	Liedon Säästöpankki	Liedon Säästöpankki	Liedon Säästöpankki	Liedon Säästöpankki	Myrskylän Säästöpankki
2	Unique identifier (ISIN)	FI4000207030	FI4000201504	FI4000257449	FI4000176474	FI4000201645	FI4000223946	FI4000252200	FI4000288394
3	Governing law(s) of the instrument	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation
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)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)
8	Amount recognised in regulatory capital	643	249	715	89	295	830	473	581
9	Nominal amount of instrument	5,000	2,000	2,000	3,390	2,344	3,634	1,443	1,393
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			
11	Original date of issuance	23.5.16	2.5.16	8.5.17	17.11.15	18.5.16	21.11.16	22.5.17	1.11.17
12	Perpetual or dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	23.8.21	15.8.21	15.10.22	17.2.21	18.8.21	21.2.22	22.8.22	1.2.23
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	fixed	floating	floating	floating	floating	floating
18	Coupon rate and any related index	1.50 %	2.25 %	2.10 %	12- month Eb + 0.5%, min. 2%	12- month Eb + 0.5%, min. 2%	12- month Eb + 0.5%, min. 2%	12- month euribor(360) + 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	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative
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	N/A	N/A	N/A	N/A	N/A	N/A	N/A

28	If convertible, specify instrument type convertible into	N/A							
29	If convertible, specify 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 implementing regulation (EU) No 1423/2013	31.12.2020 (EUR 1,000)						Share capital	Primary capital
1	Issuer	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Ylihärmän Säästöpankki	Member Savings Banks	Member Savings Banks
2	Unique identifier (ISIN)	FI4000201520	FI4000220165	FI4000251988	FI4000282975	FI4000257449	N/A	N/A
3	Governing law(s) of the instrument	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation
4	Transitional CRR rules	T2	T2	T2	T2	T2	CET1	CET1
5	Post-transitional CRR rules	T2	T2	T2	T2	T2	CET1	CET1
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)	486 (4)	486 (4)	486 (4)	486 (4)	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	158	315	219	270	1,252	25,313	32,452
9	Nominal amount of instrument	1,433	1,626	708	665	3,500	N/A	32,452
9a	Issue price	100 %	100 %	100 %	100 %	100 %	N/A	100 %
9b	Redemption price	100 %	100 %	100 %	100 %	100 %	N/A	100 %
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Shareholders' equity	Primary capital holders' equity
11	Original date of issuance	20.4.16	19.9.16	18.4.17	11.10.17	8.5.17	Each savings bank limited company has a separate issuance date of ordinary shares.	Each savings bank has separate issuance dates of primary capital.
12	Perpetual or dated	Dated	Dated	Dated	Dated	Dated	Perpetual	Perpetual
13	Original maturity date	20.7.21	20.12.21	18.7.22	11.1.23	15.10.22	No maturity	No maturity
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	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	N/A	N/A	see row 15
17	Fixed or floating dividend/coupon	floating	fixed	fixed	fixed	fixed	Floating	Floating
18	Coupon rate and any related index	Fixed 1.5% until 20.7.2018, thereafter Euribor 12-month + 1.0 % (minimum 1.0%)	1.50 %	1.50 %	1.50 %	2.10 %	N/A	N/A
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	Fully discretionary	Fully discretionary
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Fully discretionary	Fully discretionary
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative
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	N/A	N/A	N/A	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A	N/A	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A	N/A	N/A	N/A	N/A
30	Write-down features	ei	ei	ei	ei	ei	ei	N/A
31	If write-down, write-down trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A	ei
32	If write-down, full or partial	N/A	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	N/A
34	If temporary write-down, description of write-up mechanism	N/A	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	Debentures	Debentures				
36	Non-compliant transitioned features	No	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	ei

Commission implementing regulation (EU) No 1423/2013	31.12.2019 (EUR 1,000)								
1	Issuer	Aito Säästöpankki Oy	Aito Säästöpankki Oy	Avain Säästöpankki	Avain Säästöpankki	Avain Säästöpankki	Eurajoen Säästöpankki	Helmi Säästöpankki Oy	Liedon Säästöpankki
2	Unique identifier (ISIN)	FI4000153903	FI4000207030	FI4000153622	FI4000201504	FI4000257449	FI4000157169	FI4000157516	FI4000153630
3	Governing law(s) of the instrument	Finnish legislation							
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)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)
8	Amount recognised in regulatory capital	652	1 646	317	650	1 116	658	286	227
9	Nominal amount of instrument	5 000	5 000	2 000	2 000	2 000	3 584	1 762	1 791
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	25.5.15	23.5.16	11.5.15	2.5.16	8.5.17	8.6.15	22.6.15	18.5.15
12	Perpetual or dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	25.8.20	23.8.21	15.10.20	15.8.21	15.10.22	30.11.20	22.10.20	18.8.20
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	floating						
18	Coupon rate and any related index	2.00 %	1.50 %	2.25 %	2.25 %	2.10 %	2.60 %	2.00 %	12-month Euribor + 0.50% (minimum rate 2.0 %)
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	Noncumulative							
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, specify instrument type convertible into	N/A							
29	If convertible, specify 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							

\*Information for 2019 has been corrected.

Commission implementing regulation (EU) No 1423/2013	31.12.2019 (EUR 1,000)								
1	Issuer	Liedon Säästöpankki	Liedon Säästöpankki	Liedon Säästöpankki	Liedon Säästöpankki	Myrskylän Säästöpankki	Myrskylän Säästöpankki	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy
2	Unique identifier (ISIN)	FI4000176474	FI4000201645	FI4000223946	FI4000252200	FI4000157482	FI4000288394	FI4000153523	FI4000170626
3	Governing law(s) of the instrument	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation
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)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)
8	Amount recognised in regulatory capital	769	765	1,558	763	133	861	170	586
9	Nominal amount of instrument	3,390	2,344	3,634	1,443	812	1,393	1,428	3,007
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			
11	Original date of issuance	17.11.15	18.5.16	21.11.16	22.5.17	26.6.15	1.11.17	4.5.15	21.9.15
12	Perpetual or dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	17.2.21	18.8.21	21.2.22	22.8.22	26.10.20	1.2.23	4.8.20	21.12.20
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	floating	floating	floating	fixed	floating	floating	floating
18	Coupon rate and any related index	12- month Euribor + 0.5%, min. 2%	12- month Euribor + 0.5%, min. 2%	12- month Euribor + 0.5%, min. 2%	12- month euribor(360) + 0.5%, min 2%	2.10 %	12- month euribor + 0.5%. Min. 2 %	Fixed 2.5% until 4.8.2017, thereafter floating Euribor 12-month + 1.25 % (minimum 1.25%)	Fixed 2.75% until 21.12.2017, thereafter floating Euribor 12-month + 1.0 % (minimum 1.0%)
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	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative
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, specify instrument type convertible into	N/A							
29	If convertible, specify issuer of instrument it converts into	N/A							
30	Write-down features*	N/A							
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							

\*Information for 2019 has been corrected.

Commission implementing regulation (EU) No 1423/2013	31.12.2019 (EUR 1,000)							Share capital	Primary capital
1	Issuer	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Nooa Säästöpankki Oy	Ylihärmän Säästöpankki	Ylihärmän Säästöpankki	Member Savings Banks	Member Savings Banks
2	Unique identifier (ISIN)	FI4000201520	FI4000220165	FI4000251988	FI4000282975	FI4000153622	FI4000257449	N/A	N/A
3	Governing law(s) of the instrument	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation	Finnish legislation
4	Transitional CRR rules	T2	T2	T2	T2	T2	T2	CET1	CET1
5	Post-transitional CRR rules*	N/A	N/A	N/A	N/A	N/A	N/A	CET1	CET1
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)	486 (4)	486 (4)	486 (4)	486 (4)	486 (4)	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	445	641	361	403	396	1,953	20,202	34,452
9	Nominal amount of instrument	1,433	1,626	708	665	2,500	3,500	N/A	34,452
9a	Issue price	100 %	100 %	100 %	100 %	100 %	100 %	N/A	100 %
9b	Redemption price	100 %	100 %	100 %	100 %	100 %	100 %	N/A	100 %
10	Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Shareholders' equity	Primary capital holders' equity
11	Original date of issuance	20.4.16	19.9.16	18.4.17	11.10.17	11.5.15	8.5.17	Each savings bank limited company has a separate issuance date of ordinary shares.	Each savings bank has separate issuance dates of primary capital.
12	Perpetual or dated	Dated	Dated	Dated	Dated	Dated	Dated	Perpetual	Perpetual
13	Original maturity date	20.7.21	20.12.21	18.7.22	11.1.23	15.10.20	15.10.22	No maturity	No maturity
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	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	N/A	N/A	N/A	see row 15
17	Fixed or floating dividend/coupon	floating	fixed	fixed	fixed	fixed	fixed	Floating	Floating
18	Coupon rate and any related index	Fixed 1.5% until 20.7.2018, thereafter Euribor 12-month + 1.0 % (minimum 1.0%)	1.50 %	1.50 %	1.50 %	2.25 %	2.10 %	N/A	N/A
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	Fully discretionary	Fully discretionary
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Fully discretionary	Fully discretionary
21	Existence of step up or other incentive to redeem	No	No						
22	Noncumulative or cumulative	Noncumulative	Noncumulative						
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						
25	If convertible, fully or partially	N/A	N/A						
26	If convertible, conversion rate	N/A	N/A						
27	If convertible, mandatory or optional conversion	N/A	N/A						
28	If convertible, specify instrument type convertible into	N/A	N/A						
29	If convertible, specify issuer of instrument it converts into	N/A	N/A						
30	Write-down features*	N/A	N/A	N/A	N/A	N/A	N/A	ei	ei
31	If write-down, write-down trigger (s)	N/A	N/A						
32	If write-down, full or partial	N/A	N/A						
33	If write-down, permanent or temporary	N/A	N/A						
34	If temporary write-down, description of write-up mechanism	N/A	N/A						
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior unsecured	Debentures	Debentures					
36	Non-compliant transitioned features	No	No						
37	If yes, specify non-compliant features*	N/A	N/A						

\*Information for 2019 has been corrected.

## NOTE 4: RECONCILIATION OF OWN FUNDS

### Reconciliation of own funds

(EUR 1,000)	31.12.2020	31.12.2019
<b>Total shareholders' equity (IFRS)</b>	1,155,709	1,118,391
Deductions	-40,690	-51,788
<b>CET1 capital before statutory adjustments</b>	<b>1,115,019</b>	<b>1,066,603</b>
Profit for the period	-1,691	-1,884
Cash flow hedging	-3,021	-3,416
Intangible assets	-34,021	-31,823
Difference in deferred tax assets	-6,708	-846
<b>TOTAL CET1 CAPITAL</b>	<b>1,069,578</b>	<b>1,028,632</b>

## NOTE 5: MINIMUM CAPITAL REQUIREMENT

Credit and counterparty risk	31.12.2020	31.12.2020	31.12.2019	31.12.2019
Exposure class (EUR 1,000)	Risk weighted assets	Capital requirement	Risk weighted assets	Capital requirement
Exposures to central governments or central banks				
Exposures to regional governments or local authorities	447	36	397	32
Exposures to public sector entities	307	25		
Exposures to multilateral development banks				
Exposures to international organisations				
Exposures to institutions	46,852	3,748	36,873	2,950
Exposures to corporates	1,104,103	88,328	1,081,896	86,552
Retail exposures	866,798	69,344	864,428	69,154
Exposures secured by mortgages on immovable property	2,328,179	186,254	2,244,559	179,565
Exposures in default	58,824	4,706	67,276	5,382
Exposures associated with particularly high risk	13,665	1,093	13,421	1,074
Exposures in the form of covered bonds	3,575	286	4,036	323
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)	359,607	28,769	324,529	25,962
Equity exposures	79,870	6,390	79,719	6,378
Other items	117,882	9,431	128,336	10,267
<b>Credit risk total</b>	<b>4,980,108</b>	<b>398,409</b>	<b>4,845,471</b>	<b>387,638</b>
Credit valuation adjustment (CVA)	111,723	8,938	101,758	8,141
Market risk	29,883	2,391	28,824	2,306
Operational risk	517,102	41,368	499,932	39,995
<b>TOTAL</b>	<b>5,638,817</b>	<b>451,105</b>	<b>5,475,985</b>	<b>438,079</b>

## NOTE 6: TOTAL EXPOSURE

### Credit and counterparty risk 31.12.2020

Exposure class (EUR 1,000)	Balance sheet items	Off balance sheet items	Derivatives	Total
Exposures to central governments or central banks	1,428,029			1,428,029
Exposures to regional governments or local authorities	19,308	2,721		22,029
Exposures to public sector entities	1,534			1,534
Exposures to multilateral development banks	102,058			102,058
Exposures to international organisations				
Exposures to institutions	90,664	4,206	105,224	200,095
Exposures to corporates	1,121,393	169,759		1,291,152
Retail exposures	1,804,956	402,089		2,207,045
Exposures secured by mortgages on immovable property	6,726,999	133,046		6,860,045
Exposures in default	78,601	101		78,702
Exposures associated with particularly high risk	9,110			9,110
Exposures in the form of covered bonds	35,746			35,746
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)	381,296			381,296
Equity exposures	41,923			41,923
Other items	131,986			131,986
<b>TOTAL</b>	<b>11,973,602</b>	<b>711,923</b>	<b>105,224</b>	<b>12,790,750</b>

### Credit and counterparty risk 31.12.2019

Exposure class (EUR 1,000)	Balance sheet items	Off balance sheet items	Derivatives	Total
Exposures to central governments or central banks	954,799	2		954,801
Exposures to regional governments or local authorities	21,389	1,282		22,671
Exposures to public sector entities				
Exposures to multilateral development banks	1,079			1,079
Exposures to international organisations				
Exposures to institutions	39,333	21	102,974	142,327
Exposures to corporates	1,089,154	175,669		1,264,823
Retail exposures	1,715,688	358,275		2,073,963
Exposures secured by mortgages on immovable property	6,467,266	143,018		6,610,284
Exposures in default	83,800	96		83,895
Exposures associated with particularly high risk	8,948			8,948
Exposures in the form of covered bonds	40,363			40,363
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)	359,454			359,454
Equity exposures	41,845			41,845
Other items	146,007			146,007
<b>TOTAL</b>	<b>10,969,123</b>	<b>678,363</b>	<b>102,974</b>	<b>11,750,459</b>

## NOTE 7: CREDIT RISK EXPOSURES BY RISK WEIGHTS

### Credit and counterparty risk

Risk weight (%)	31.12.2020 (EUR 1,000)	31.12.2019 (EUR 1,000)
0	1,575,144	1,004,995
10	39,665	45,373
20	207,050	158,156
35	6,727,182	6,498,229
50	149,926	134,649
75	2,207,045	2,073,963
100	1,793,569	1,745,029
150	65,870	64,769
250	25,298	25,249
350		
1250		46
<b>TOTAL EXPOSURE</b>	<b>12,790,750</b>	<b>11,750,459</b>

## NOTE 8: CREDIT RISK EXPOSURES BY MATURITY

Credit and counterparty risk 31.12.2020

Exposure class (EUR 1,000)	Total	less than 3 months	3-12 months	1-5 years	5-10 years	over 10 years
Exposures to central governments or central banks	1,428,029	1,246,898	4,013	92,663	79,076	5,379
Exposures to regional governments or local authorities	22,029	500	68	2,058	13,766	5,638
Exposures to public sector entities	1,534				1,534	
Exposures to multilateral development banks	102,058	101,000		1,058		
Exposures to international organisations						
Exposures to institutions	200,095		104,992	72,710	19,101	3,291
Exposures to corporates	1,291,152	69,185	101,278	398,517	290,949	431,222
Retail exposures	2,207,045	40,505	78,373	234,636	368,771	1,484,761
Exposures secured by mortgages on immovable property	6,860,045	53,444	85,891	440,660	995,559	5,284,492
Exposures in default	78,702	45,896	2,615	4,163	5,971	20,057
Exposures associated with particularly high risk	9,110					9,110
Exposures in the form of covered bonds	35,746			28,197	7,549	
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)	381,296					381,296
Equity exposures	41,923					41,923
Other items	131,986	39,879		48		92,059
<b>TOTAL EXPOSURES</b>	<b>12,790,750</b>	<b>122,157</b>	<b>1,028,429</b>	<b>1,725,683</b>	<b>1,900,744</b>	<b>8,013,737</b>

## Credit and counterparty risk 31.12.2019

Exposure class (EUR 1,000)	Total	less than 3 months	3-12 months	1-5 years	5-10 years	over 10 years
Exposures to central governments or central banks	954,801	739,178	37,316	76,607	94,429	7,270
Exposures to regional governments or local authorities	22,671	1,203	165	3,408	13,786	4,109
Exposures to public sector entities						
Exposures to multilateral development banks	1,079			1,079		
Exposures to international organisations						
Exposures to institutions	142,327		73,452	58,402	8,237	2,236
Exposures to corporates	1,264,823	60,052	123,933	390,858	269,640	420,339
Retail exposures	2,073,963	32,532	66,657	214,362	341,106	1,419,305
Exposures secured by mortgages on immovable property	6,610,284	62,894	96,633	438,256	986,574	5,025,927
Exposures in default	83,895	41,952	2,670	6,329	6,204	26,740
Exposures associated with particularly high risk	8,948	1,880				7,067
Exposures in the form of covered bonds	40,363			26,234	14,129	
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)	359,454					359,454
Equity exposures	41,845					41,845
Other items	146,007	51,146		15		94,845
<b>TOTAL EXPOSURES</b>	<b>11,750,459</b>	<b>990,838</b>	<b>400,826</b>	<b>1,215,552</b>	<b>1,734,106</b>	<b>7,409,138</b>

## NOTE 9: CREDIT RISK EXPOSURES BY BUSINESS SEGMENTS

Credit and counterparty risk 31.12.2020

Exposure class (EUR 1,000)	Total	Other	Private customers	Agricultural	Corporate	-of which SME exposures
Exposures to central governments or central banks	1,428,029	1,428,029				
Exposures to regional governments or local authorities	22,029	22,029				
Exposures to public sector entities	1,534	1,534				
Exposures to multilateral development banks	102,058	102,058				
Exposures to international organisations						
Exposures to institutions	200,095	200,095				
Exposures to corporates	1,291,152	37,669	39,088	184,612	1,029,783	173,814
Retail exposures	2,207,045		1,446,325	243,157	517,564	463,738
Exposures secured by mortgages on immovable property	6,860,045	23,034	5,784,675	205,996	846,340	802,884
Exposures in default	78,702	1,068	46,919	6,703	24,012	
Exposures associated with particularly high risk	9,110	9,110				
Exposures in the form of covered bonds	35,746	35,746				
Items representing securitisation positions						
Exposures to institutions and corporates with a short-term credit assessment						
Exposures in the form of units or shares in collective investment undertakings (CIUs)	381,296	380,797			500	
Equity exposures	41,923	32,901		450	8,571	
Other items	131,986	131,986				
Other exposure classes in total						
<b>TOTAL EXPOSURES</b>	<b>12,790,750</b>	<b>2,406,055</b>	<b>7,317,006</b>	<b>640,918</b>	<b>2,426,771</b>	<b>1,440,436</b>

Credit and counterparty risk 31.12.2019

Exposure class (EUR 1,000)	Total	Other	Private customers	Agricultural	Corporate	-of which SME exposures
Exposures to central governments or central banks	954,801	954,801				
Exposures to regional governments or local authorities	22,671	22,671				
Exposures to public sector entities						
Exposures to multilateral development banks	1,079	1,079				
Exposures to international organisations						
Exposures to institutions	142,327	142,327				
Exposures to corporates	1,264,823	36,569	34,948	172,984	1,020,321	170,107
Retail exposures	2,073,963	2,583	1,380,959	231,729	458,692	438,458
Exposures secured by mortgages on immovable property	6,610,284	18,965	5,644,464	206,198	740,657	696,353
Exposures in default	83,895	1,160	49,886	6,371	26,478	
Exposures associated with particularly high risk	8,948	8,948				
Exposures in the form of covered bonds	40,363	40,363				
Items representing securitisation positions						
Exposures to institutions and corporates with a short-term credit assessment						
Exposures in the form of units or shares in collective investment undertakings (CIUs)	359,454	359,454				
Equity exposures	41,845	33,017		450	8,378	
Other items	146,007	146,007				
Other exposure classes in total						
<b>TOTAL EXPOSURES</b>	<b>11,750,459</b>	<b>1,767,943</b>	<b>7,110,257</b>	<b>617,732</b>	<b>2,254,526</b>	<b>1,304,918</b>

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

### Credit and counterparty risk 31.12.2020

Exposure class (EUR 1,000)	Total exposures	Guarantees	Financial guarantees	Other guarantees
Exposures to central governments or central banks	1,428,029			
Exposures to regional governments or local authorities	22,029		16	
Exposures to public sector entities	1,534			
Exposures to multilateral development banks	102,058			
Exposures to international organisations				
Exposures to institutions	200,095			
Exposures to corporates	1,291,152	83,727	7,897	
Retail exposures	2,207,045	620,845	47,291	1,727
Exposures secured by mortgages on immovable property	6,860,045			6,860,045
Exposures in default	78,702	2,247	1,113	376
Exposures associated with particularly high risk	9,110			
Exposures in the form of covered bonds	35,746			
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)	381,296			
Equity exposures	41,923			
Other items	131,986			
Other exposure classes in total				
<b>TOTAL EXPOSURES</b>	<b>12,790,750</b>	<b>706,820</b>	<b>56,317</b>	<b>6,862,148</b>

## Credit and counterparty risk 31.12.2019

Exposure class (EUR 1,000)	Total exposures	Guarantees	Financial guarantees	Other guarantees
Exposures to central governments or central banks	954,801			
Exposures to regional governments or local authorities	22,671		20	
Exposures to public sector entities				
Exposures to multilateral development banks	1,079			
Exposures to international organisations				
Exposures to institutions	142,327			
Exposures to corporates	1,264,823	71,875	7,079	
Retail exposures	2,073,963	530,728	43,416	1,727
Exposures secured by mortgages on immovable property	6,610,284			*6,610,284
Exposures in default	83,895	2,220	1,025	371
Exposures associated with particularly high risk	8,948			
Exposures in the form of covered bonds	40,363			
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)	359,454			
Equity exposures	41,845			
Other items	146,007			
Other exposure classes in total				
<b>TOTAL EXPOSURES</b>	<b>11,750,459</b>	<b>604,823</b>	<b>51,541</b>	<b>6,607,301</b>

\*Figure with reference date 31.12.2019 has been corrected. After correction the figure is align with supervisory reporting and the figure consists of exposures which are secured fully and completely secured by collateral.

## NOTE 11: THE GEOGRAPHICAL DISTRIBUTION OF RELEVANT CREDIT EXPOSURES

### Credit and counterparty risk 31.12.2020

Exposure class (EUR 1,000)	Total	Finland	Other countries
Exposures to central governments or central banks	1,428,029	1,277,053	150,975
Exposures to regional governments or local authorities	22,029	22,029	
Exposures to public sector entities	1,534	1,534	
Exposures to multilateral development banks	102,058	101,000	1,058
Exposures to international organisations			
Exposures to institutions	200,095	139,430	60,664
Exposures to corporates	1,291,152	1,094,273	196,879
Retail exposures	2,207,045	2,199,971	7,074
Exposures secured by mortgages on immovable property	6,860,045	6,846,273	13,772
Exposures in default	78,702	78,696	6
Exposures associated with particularly high risk	9,110	9,110	
Exposures in the form of covered bonds	35,746	6,972	28,774
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)	381,296	262,343	118,954
Equity exposures	41,923	35,808	6,115
Other items	131,986	131,986	
<b>TOTAL EXPOSURES</b>	<b>12,790,750</b>	<b>12,206,478</b>	<b>584,271</b>

Credit and counterparty risk 31.12.2019

Exposure class (EUR 1,000)	Total	Finland	Other countries
Exposures to central governments or central banks	954,801	780,374	174,428
Exposures to regional governments or local authorities	22,671	22,671	
Exposures to public sector entities			
Exposures to multilateral development banks	1,079		1,079
Exposures to international organisations			
Exposures to institutions	142,327	77,284	65,044
Exposures to corporates	1,264,823	1,071,219	193,603
Retail exposures	2,073,963	2,067,274	6,689
Exposures secured by mortgages on immovable property	6,610,284	6,597,155	13,129
Exposures in default	83,895	83,757	138
Exposures associated with particularly high risk	8,948	8,948	
Exposures in the form of covered bonds	40,363	7,470	32,893
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)	359,454	238,548	120,906
Equity exposures	41,845	37,656	4,189
Other items	146,007	146,007	
<b>TOTAL EXPOSURES</b>	<b>11,750,459</b>	<b>11,138,361</b>	<b>612,098</b>

## NOTE 12: ASSET ENCUMBRANCE

### Template A - Encumbered and unencumbered assets

31.12.2020 (EUR 1,000)		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
			of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	050	060	080	090	100
010	<b>Assets of the reporting institution</b>	<b>2,082,228</b>				<b>9,743,268</b>			
030	Equity instruments					40,794			
040	Debt securities	96,619		96,619		981,525		983,594	
050	of which: covered bonds					39,101		39,103	
060	of which: asset-backed securities								
070	of which: issued by general governments	6,519		6,519		184,666		185,235	
080	of which: issued by financial corporations	57,982		57,982		429,871		430,117	
090	of which: issued by non-financial corporations	33,730		33,730		365,928		367,228	
120	Other assets	1,965,390				8,742,820			
121	of which: mortgage loans	1,963,500				6,695,756			

Template A - Encumbered and unencumbered assets

31.12.2019 (EUR 1,000)		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
			of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	050	060	080	090	100
010	<b>Assets of the reporting institution</b>	1,916,877				9,359,861			
030	Equity instruments					44,665			
040	Debt securities	51,189		51,249		1,041,717		1,043,973	
050	of which: covered bonds					39,919		39,920	
060	of which: asset-backed securities								
070	of which: issued by general governments	19,609		19,667		165,557		166,557	
080	of which: issued by financial corporations	3,615		3,615		475,388		476,267	
090	of which: issued by non-financial corporations	27,524		27,524		383,950		384,440	
120	Other assets	1,865,548				8,288,914			
121	of which: mortgage loans	1,861,883				6,466,857			

Template B-Collateral received

31.12.2020 (EUR 1,000)		Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
				Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	060
130	<b>Collateral received by the reporting institution</b>				
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	<b>Own debt securities issued other than own covered bonds or asset-backed securities</b>				
241	<b>Own covered bonds and asset-backed securities issued and not yet pledged</b>				
250	<b>TOTAL ASSETS, COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED</b>	<b>2,082,228</b>			

Template B-Collateral received

31.12.2019 (EUR 1,000)		Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
				Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	060
130	<b>Collateral received by the reporting institution</b>				
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	<b>Own debt securities issued other than own covered bonds or asset-backed securities</b>				
241	<b>Own covered bonds and asset-backed securities issued and not yet pledged</b>				
250	<b>TOTAL ASSETS, COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED</b>	1,916,877			

### Template C-Sources of encumbrance

(EUR 1,000)		31.12.2020		31.12.2019	
		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered
		O10	O30	O10	O30
O10	Carrying amount of selected financial liabilities	1,559,352	2,082,228	1,535,127	1,916,877
O11	of which: covered bonds	1,496,390	1,963,500	1,495,358	1,861,883

### Template D- Accompanying narrative information

The figures in templates A-C are median values calculated from quarter end values for the reporting year. The Amalgamation's asset encumbrance level was 17,8 % at the end of 2020. The most significant source of asset encumbrance for the Amalgamation were covered bonds issued by Sp Mortgage Bank. Mortgage bank activity accounted for 96 % of the Amalgamation's asset encumbrance. Sp Mortgage Bank had EUR 1,500 million of outstanding covered bonds and EUR 2,059 million of encumbered mortgage loans at the end of 2020. The amalgamation has not retained any of Sp Mortgage Bank's issued covered bonds.

## NOTE 13: OPERATIONAL RISK

(EUR 1,000)	2020	2019	2018	2016	2016	Minimum capital requirement
Gross income total	296,473	302,745	228,145	269,001	237,005	
Profit indicator	44,471	45,412	34,222	40,350	35,551	41,368

(EUR 1,000)	2019	2018	2017	2016	2015	Minimum capital requirement
Gross income total	302,745	228,145	269,001	237,005	216,160	
Profit indicator	45,412	34,222	40,350	35,551	32,424	39,995

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

Minimum 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 insufficient internal processes, personnel, systems or external factor.

## NOTE 14: LEVERAGE RATIO

### Summary reconciliation of accounting assets and leverage ratio exposures

(EUR 1,000)		31.12.2020	31.12.2019
1	Total assets as per published financial statements	12,098,470	11,081,516
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	19,577	22,851
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)	250,693	242,512
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	-81,782	-69,737
<b>8</b>	<b>Total leverage ratio exposure measure</b>	<b>12,286,958</b>	<b>11,277,141</b>

Leverage ratio common disclosure		CRR leverage ratio exposures	
		31.12.2020	31.12.2019
<b>On-balance sheet exposures (excluding derivatives and SFTs)</b>			
1	On-balance sheet items (excluding derivatives, SFTs and fiduciary assets, but including collateral)	11,971,869	10,964,326
2	(Asset amounts deducted in determining Tier 1 capital)	-40,729	-32,670
3	Total on-balance sheet exposures (excluding derivatives, SFTs and fiduciary assets) (sum of lines 1 and 2)	11,931,140	10,931,656
<b>Derivative exposures</b>			
4	Replacement cost associated with all derivatives transactions (ie net of eligible cash variation margin)	85,647	80,123
5	Add-on amounts for PFE associated with all derivatives transactions (mark-to-market method)	19,577	22,851
11	Total derivative exposures (sum of lines 4 to 10)	105,224	102,974
<b>Securities financing transaction exposures</b>			
16	Total securities financing transaction exposures (sum of lines 12 to 15a)		
<b>Other off-balance sheet exposures</b>			
17	Off-balance sheet exposures at gross notional amount	687,882	654,808
18	Adjustments related to credit conversion factors	-437,189	-412,296
19	Other off-balance sheet exposures (sum of lines 17 and 18)	250,693	242,512
<b>Exempted exposures in accordance with Article 429(7) and (14) of Regulation (EU) No 575/2013 (on and off balance sheet)</b>			
<b>Capital and total exposures</b>			
20	Tier 1 capital	1,069,578	1,028,632
21	Leverage ratio total exposure measure (sum of lines 3, 11, 16, 19, EU-19a and EU-19b)	12,287,058	11,277,141
<b>Leverage ratio</b>			
22	Leverage ratio	8,71 %	9,12 %
<b>Choice on transitional arrangements and amount of derecognised fiduciary items</b>			
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		

Split of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)		CRR leverage ratio exposures	
		31.12.2020	31.12.2019
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	11,971,869	10,964,326
EU-2	Trading book exposures		
EU-3	Banking book exposures, of which:	11,971,869	10,964,326
EU-4	Covered bonds	35,746	40,363
EU-5	Exposures treated as sovereigns	2,135,518	1,486,062
EU-6	Exposures to regional governments, MDB, international organisations and PSE NOT treated as sovereigns	3,610	1,933
EU-7	Institutions	92,379	41,044
EU-8	Secured by mortgages of immovable properties	6,726,999	6,467,266
EU-9	Retail exposures	1,191,735	1,189,883
EU-10	Corporate	1,125,917	1,086,889
EU-11	Exposures in default	54,921	61,963
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	605,044	588,923

#### Free text 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	Total exposures increased relatively more than Tier 1 capital, resulting in weakening of the leverage ratio. The growth of exposures was most significant in exposures treated as sovereigns and exposures secured by mortgages of immovable properties.

## 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) 31.12.2020	General credit exposures		Trading book exposure		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: Securitisation exposures	Total	Own funds requirement weights, %
Breakdown by country											
Britain	10,925						874			874	0.2 %
Norway	13,055						1,044			1,044	0.3 %
Belgium	1,750						140			140	0.0 %
Germany	17,380						1,390			1,390	0.4 %
Denmark	22,204						1,776			1,776	0.5 %
Sweden	59,244						4,739			4,739	1.2 %
France	16,429						1,314			1,314	0.3 %
Lithuania	210						17			17	0.0 %
Iceland	33						3			3	0.0 %
Czech republic											0.0 %
Slovakia	72						6			6	0.0 %
Luxemburg	106,229						8,498			8,498	2.2 %
Ireland	28,414						2,273			2,273	0.6 %
Other	4,656,557						372,525			372,525	94.4 %
<b>TOTAL</b>	<b>4,932,502</b>						<b>394,600</b>			<b>394,600</b>	<b>100.0 %</b>

Amount of institution-specific countercyclical capital buffer

(EUR 1,000)	31.12.2020
Total risk exposure amount	5,638,817
Institution specific countercyclical buffer rate, %	0.01 %
Institution specific countercyclical buffer requirement	454

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

(EUR 1,000) 31.12.2019	General credit exposures		Trading book exposure		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: Securitisation exposures	Total	Own funds requirement weights, %
Breakdown by country											
Finland	10,258,034						358,289			358,289	93.1 %
Denmark	25,672						1,846			1,846	0.5 %
Sweden	58,687						4,178			4,178	1.1 %
Iceland	125						3			3	0.0 %
Britain	15,925						1,039			1,039	0.3 %
Norway	20,097						934			934	0.2 %
France	23,962						1,529			1,529	0.4 %
Slovakia	14										0.0 %
Czech republic	26										0.0 %
Ireland	30,335						2,239			2,239	0.6 %
Lithuania	212						17			17	0.0 %
Other	196,491						14,583			14,583	3.8 %
<b>TOTAL</b>	<b>10,629,581</b>						<b>384,656</b>			<b>384,656</b>	<b>100.0 %</b>

## Amount of institution-specific countercyclical capital buffer

(EUR 1,000)	31.12.2019
Total risk exposure amount	5,475,985
Institution specific countercyclical buffer rate, %	0.05 %
Institution specific countercyclical buffer requirement	2,606

## NOTE 16: LIQUIDITY COVERAGE RATIO

### LCR disclosure template on quantitative information of LCR

Amalgamation (EUR 1,000)		Average			
31.12.2020					
	Quarter ending on	31.12.2020	30.9.2020	30.6.2020	31.3.2020
	Number of data points used in the calculation of averages	12	12	12	12
<b>Total adjusted value</b>					
21	Liquidity buffer	1,365,223,95	1,252,299,72	1,256,874,49	1,236,523,96
22	Total Net cash outflows	784,692,04	758,381,06	737,595,60	687,624,83
23	Liquidity coverage ratio (%)	178 %	169 %	175 %	180 %

Amalgamation (EUR 1,000)		Average			
31.12.2019					
	Quarter ending on	31.12.2019	30.9.2019	30.6.2019	31.3.2019
	Number of data points used in the calculation of averages	12	12	12	12
<b>Total adjusted value</b>					
21	Liquidity buffer	1,182,921	1,159,009	1,041,193	967,6843
22	Total Net cash outflows	684,145	665,1458	636,028	614,542
23	Liquidity coverage ratio (%)	172 %	173 %	163 %	158 %

31.12.2020

#### Template on qualitative information on LC

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 5 % of the Amalgamation's net liquidity outflows at the end of the year 2020.
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: CREDIT QUALITY OF FORBORNE EXPOSURES

31.12.2020 (EUR 1,000)		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures Of which collateral and financial guarantees received on non-performing exposures with forbearance measures	
		Performing forborne	Non-performing forborne		On performing forborne exposures	On non-performing forborne exposures			
				Of which defaulted			Of which impaired		
1	<b>Loans and advances</b>	159,698	49,045	9,996	48,614	-795	-5,469	198,372	42,400
2	Central banks								
3	General governments								
4	Credit institutions								
5	Other financial corporations		18		18		-18		
6	Non-financial corporations	33,579	12,463	1,346	12,460	-265	-1,056	43,342	11,227
7	Households	126,119	36,564	8,650	36,136	-530	-4,395	155,030	31,173
8	<b>Debt Securities</b>								
9	Loan commitments given	122	21	7	21	1	1	94	12
10	<b>Total</b>	159,819	49,066	10,003	48,635	-794	-5,468	198,466	42,412

31.12.2019 (EUR 1,000)		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forbore exposures Of which collateral and financial guarantees received on non-performing exposures with forbearance measures	
		Performing forbore	Non-performing forbore		Of which impaired	On performing forbore exposures	On non-performing forbore exposures		
Of which defaulted									
1	<b>Loans and advances</b>	10,620	13,048	5,147	12,584	-91	-2,585	20,069	9,951
2	Central banks								
3	General governments								
4	Credit institutions								
5	Other financial corporations								
6	Non-financial corporations	1,869	1,372	652	1,372	-4	-219	2,750	1,040
7	Households	8,752	11,676	4,495	11,212	-87	-2,366	17,319	8,911
8	<b>Debt Securities</b>								
9	Loan commitments given	19	6	3	6	0	0	12	1
10	<b>Total</b>	10,639	13,054	5,150	12,590	-91	-2,585	20,081	9,952

## NOTE 18: CREDIT QUALITY OF PERFORMING AND NON-PERFORMING EXPOSURES BY PAST DUE DAYS

31.12.2020 (EUR 1,000)		a	b	c	d	e	f	g	h	i	j	k	l	
		Gross carrying amount/nominal amount												
		Performing exposures			Non-performing exposures									
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted	
1	<b>Loans and advances</b>	9,210,381	9,175,254	35,127	208,176	133,929	12,262	14,349	23,510	19,206	1,831	3,090	84,082	
2	Central banks	75,107	75,107											
3	General governments	17,324	17,324											
4	Credit institutions	567	567											
5	Other financial corporations	12,678	12,678		46	43	3						3	
6	Non-financial corporations	1,791,988	1,788,333	3,655	59,736	36,086	1,575	3,975	11,192	5,227	728	953	26,268	
7	Of which SMEs	1,768,456	1,764,801	3,655	59,736	36,086	1,575	3,975	11,192	5,227	728	953	26,268	
8	Households	7,312,718	7,281,245	31,473	148,395	97,799	10,685	10,374	12,318	13,978	1,103	2,137	57,811	
9	<b>Debt securities</b>	1,112,974	1,112,974		7,487	7,487								
10	Central banks													
11	General governments	179,241	179,241											
12	Credit institutions	117,297	117,297											
13	Other financial corporations	414,865	414,865		478	478								
14	Non-financial corporations	401,571	401,571		7,009	7,009								
15	<b>Off-balance-sheet exposures</b>	705,168			6,704								2,065	
16	Central banks													
17	General governments	2,071												
18	Credit institutions	7,457												
19	Other financial corporations	5,922												
20	Non-financial corporations	292,430			5,661								1,663	
21	Households	397,287			1,043								402	
22	<b>Total</b>	11,028,524	10,288,228	35,127	222,367	141,415	12,262	14,349	23,510	19,206	1,831	3,090	86,147	

31.12.2019 (EUR 1,000)		a	b	c	d	e	f	g	h	i	j	k	l	
		Gross carrying amount/nominal amount												
		Performing exposures			Non-performing exposures									
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted	
1	<b>Loans and advances</b>	<b>9,516,437</b>	<b>9,487,486</b>	<b>28,951</b>	<b>214,399</b>	<b>133,226</b>	<b>18,618</b>	<b>19,112</b>	<b>21,475</b>	<b>17,202</b>	<b>2,548</b>	<b>2,219</b>	<b>93,385</b>	
2	Central banks	734,636	734,636											
3	General governments	20,125	20,125		0	0								
4	Credit institutions	46,632	46,632											
5	Other financial corporations	7,113	7,113		557	557								
6	Non-financial corporations	1,598,803	1,593,517	5,286	60,171	34,356	5,462	5,456	7,350	6,157	654	735	29,829	
7	Of which SMEs	1,103,614	1,101,564	2,049	52,242	29,761	4,858	4,543	5,910	5,906	654	610	26,490	
8	Households	7,109,127	7,085,462	23,665	153,670	98,313	13,156	13,655	14,124	11,045	1,893	1,484	63,555	
9	<b>Debt securities</b>	<b>1,093,634</b>	<b>1,093,634</b>		<b>307</b>	<b>307</b>								
10	Central banks													
11	General governments	205,960	205,960											
12	Credit institutions	72,433	72,433											
13	Other financial corporations	399,316	399,316											
14	Non-financial corporations	415,924	415,924		307	307								
15	<b>Off-balance-sheet exposures</b>	<b>674,827</b>			<b>3,546</b>								<b>1,264</b>	
16	Central banks													
17	General governments	1,132												
18	Credit institutions	4,105												
19	Other financial corporations	636			0									
20	Non-financial corporations	287,563			2,442								940	
21	Households	381,390			1,103								324	
22	<b>Total</b>	<b>11,284,898</b>	<b>10,581,119</b>	<b>28,951</b>	<b>218,251</b>	<b>133,533</b>	<b>18,618</b>	<b>19,112</b>	<b>21,475</b>	<b>17,202</b>	<b>2,548</b>	<b>2,219</b>	<b>94,649</b>	

# NOTE 19: PERFORMING AND NON-PERFORMING EXPOSURES AND RELATED PROVISIONS

31.12.2020 (EUR 1,000)		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	
		Gross carrying amount/nominal amount							Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
		Performing exposures				Non-performing exposures			Performing exposures - accumulated impairment and provisions			Non-performing exposures - accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					
			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3			On performing exposures	On non-performing exposures
1	<b>Loans and advances</b>	<b>9,210,381</b>	<b>8,836,264</b>	<b>374,117</b>	<b>208,176</b>	<b>1,310</b>	<b>205,021</b>	<b>-7,793</b>	<b>-5,433</b>	<b>-2,360</b>	<b>-34,695</b>	<b>-15</b>	<b>-34,665</b>	<b>-4,985</b>	<b>8,886,876</b>	<b>164,172</b>	
2	Central banks	75,107	75,107														
3	General governments	17,324	17,324					-16	-16								
4	Credit institutions	567	567					-195	-195								
5	Other financial corporations	12,678	12,669	9	46		46	-5	-5		-22		-22		5,468	21	
6	Non-financial corporations	1,791,988	1,688,932	103,056	59,736	477	58,876	-1,980	-1,154	-826	-10,828	-2	-10,824	-3,456	1,750,914	46,020	
7	Of which SMEs	1,768,456	1,665,620	102,836	59,736	477	58,876	-1,976	-1,150	-826	-10,828	-2	-10,824	-3,456	1,728,098	46,020	
8	Households	7,312,718	7,041,665	271,052	148,395	834	146,099	-5,596	-4,063	-1,533	-23,844	-13	-23,819	-1,529	7,130,495	118,131	
9	<b>Debt securities</b>	<b>1,112,974</b>	<b>684,901</b>	<b>3,656</b>	<b>7,487</b>		<b>7,487</b>	<b>-4,447</b>	<b>-4,336</b>	<b>-111</b>	<b>-3,253</b>		<b>-3,253</b>				
10	Central banks																
11	General governments	179,241	171,126					-1,889	-1,889								
12	Credit institutions	117,297	109,021					-376	-376								
13	Other financial corporations	414,865	24,443		478		478	-53	-53		-447		-447				
14	Non-financial corporations	401,571	380,312	3,656	7,009		7,009	-2,129	-2,018	-111	-2,806		-2,806				
15	<b>Off-balance-sheet exposures</b>	<b>705,168</b>	<b>685,698</b>	<b>19,470</b>	<b>6,704</b>	<b>9</b>	<b>4,511</b>	<b>1,319</b>	<b>1,243</b>	<b>76</b>	<b>111</b>		<b>109</b>		<b>295,145</b>	<b>3,438</b>	
16	Central banks																
17	General governments	2,071	2,071					11	11						2,061		
18	Credit institutions	7,457	7,457					109	109								
19	Other financial corporations	5,922	3,931	1,991				9	3	6					82		
20	Non-financial corporations	292,430	287,827	4,603	5,661		3,702	406	370	36	64		64		166,417	2,922	
21	Households	397,287	384,411	12,876	1,043	9	808	784	750	34	47		45		126,585	517	
22	<b>Total</b>	<b>11,028,524</b>	<b>10,206,864</b>	<b>397,243</b>	<b>222,367</b>	<b>1,319</b>	<b>217,018</b>	<b>-10,921</b>	<b>-8,527</b>	<b>-2,394</b>	<b>-37,836</b>	<b>-15</b>	<b>-37,809</b>	<b>-4,985</b>	<b>9,182,022</b>	<b>167,610</b>	

31.12.2019 (EUR 1,000)		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	
		Gross carrying amount/nominal amount							Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
		Performing exposures				Non-performing exposures			Performing exposures - accumulated impairment and provisions			Non-performing exposures - accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					
			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3			On performing exposures	On non-performing exposures
1	<b>Loans and advances</b>	9,516,437	8,823,278	693,159	214,399	2,490	209,679	-8,148	-4,597	-3,551	-28,943	-55	-28,564	-23,200	8,483,617	173,890	
2	Central banks	734,636	734,636														
3	General governments	20,125	20,125	0	0		0	-21	-21	0	0		0		605		
4	Credit institutions	46,632	46,632					-193	-193								
5	Other financial corporations	7,113	7,032	81	557		557	-6	-4	-1	-132		-132	-54	5,073	400	
6	Non-financial corporations	1,598,803	1,401,139	197,664	60,171	204	59,504	-1,811	-1,059	-752	-9,517	-1	-9,514	-9,162	1,555,639	46,932	
7	Of which SMEs	1,103,613	971,166	132,447	52,242	204	51,575	-1,014	-371	-644	-8,857	-1	-8,854	-8,657	1,064,989	39,916	
8	Households	7,109,127	6,613,714	495,413	153,670	2,286	149,617	-6,118	-3,320	-2,798	-19,294	-54	-18,918	-13,984	6,922,301	126,558	
9	<b>Debt securities</b>	1,093,634	683,365	2,700	307		307	-2,973	-1,773	-1,200	-107		-107				
10	Central banks																
11	General governments	205,960	205,180					-1,089	-1,089								
12	Credit institutions	72,433	60,177					-178	-178								
13	Other financial corporations	399,316	29,929					-12	-12								
14	Non-financial corporations	415,924	388,079	2,700	307		307	-1,695	-495	-1,200	-107		-107				
15	<b>Off-balance-sheet exposures</b>	674,827	653,202	21,625	3,546	15	1,925	1,095	1,026	68	46	0	46		313,903	1,287	
16	Central banks																
17	General governments	1,132	1,132					2	2						1,122		
18	Credit institutions	4,105	4,105					10	10								
19	Other financial corporations	636	604	33	0		0	0	0	0	0		0		67		
20	Non-financial corporations	287,563	276,598	10,966	2,442		1,080	260	207	53	29		29		176,771	705	
21	Households	381,390	370,764	10,627	1,103	15	844	822	806	15	16	0	16		135,943	582	
22	<b>Total</b>	11,284,898	10,159,845	717,484	218,251	2,505	211,910	-10,027	-5,344	-4,683	-29,004	-55	-28,625	-23,200	8,797,520	175,177	

## NOTE 20: COLLATERAL OBTAINED BY TAKING POSSESSION AND EXECUTION PROCESSES

31.12.2020 (EUR 1,000)		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
1	Property, plant and equipment (PP&E)		
2	Other than PP&E	400	-15
3	Residential immovable property	256	-15
4	Commercial Immovable property	144	
5	Movable property (auto, shipping, etc.)		
6	Equity and debt instruments		
7	Other		
8	<b>Total</b>	<b>400</b>	<b>-15</b>

31.12.2019 (EUR 1,000)		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
1	Property, plant and equipment (PP&E)		
2	Other than PP&E	1,936	-347
3	Residential immovable property	573	-52
4	Commercial Immovable property	1,362	-295
5	Movable property (auto, shipping, etc.)		
6	Equity and debt instruments		
7	Other		
8	<b>Total</b>	<b>1,936</b>	<b>-347</b>

# NOTE 21: READER'S MANUAL

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

Regulation	Disclosure requirement	Reference to publication
<b>CRR article 435.1</b>	<b>Risk management objectives and policies</b>	
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
c	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
e	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/	Financial statement of the Savings Banks Group
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:  (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.	Pillar III report (Rows 21, 22 and 23 of the LCR disclosure template in Annex II and qualitative information according to Annex III)

<b>CRR article 435.2</b>	<b>Information on governance arrangements</b>	
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
c	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
e	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:  <u>(i) fully consolidated;</u> <u>(ii) proportionally consolidated;</u> <u>(iii) deducted from own funds;</u> <u>(iv) neither consolidated nor deducted;</u>	Financial statement's note 1: Description of the Savings Banks Group and the Savings Banks Amalgamation, note 2: Accounting policies and note 42: Entities consolidated in Savings Banks Group's financial statements
c	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
e	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
c	the full terms and conditions of all Common Equity Tier 1, Additional Tier 1 and Tier 2 instruments;	Pillar III report
d	<u>separate disclosure of the nature and amounts of the following:</u> <u>(i) each prudential filter applied pursuant to Articles 32 to 35;</u> <u>(ii) each deduction made pursuant to Articles 36, 56 and 66;</u> <u>(iii) items not deducted in accordance with Articles 47, 48, 56, 66 and 79;</u>	Pillar III report
e	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)	Commission implementing regulation (EU) N:o 1423/2013 specifies uniform templates used in for disclosure under points (a), (b), (d) and e.	Pillar III report
EBA GL 2020/12	Guidelines amending Guidelines EBA/GL/2018/01 on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 (CRR) on the transitional period for mitigating the impact of the introduction of IFRS 9 on own funds to ensure compliance with the CRR 'quick fix' in response to the COVID-19 pandemic	Pillar III report

EBA GL 2020/11	Guidelines on supervisory reporting and disclosure requirements in compliance with the CRR 'quick fix' in response to the COVID 19 pandemic	Ei sovellu
<b>CRR article 438</b>	<b>Capital requirements</b>	
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
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
c	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:  (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;	Not applicable
e	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
<b>CRR article 439</b>	<b>Exposure to counterparty credit risk</b>	
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
c	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
e	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 considering both the benefits from legally enforceable netting agreements and collateral arrangements;	Financial statement's note 38: Offsetting of financial assets and financial liabilities
f	measures for exposure value under the methods set out in Part Three, Title II, Chapter 6, Sections 3 to 6 whichever method is applicable;	Pillar III report
g	the notional value of credit derivative hedges, and the distribution of current credit exposure by types of credit exposure;	Not applicable
h	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;	Not applicable
i	the estimate of if the institution has received the permission of the competent authorities to estimate .	Not applicable
<b>CRR article 440</b>	<b>Capital buffers</b>	
a	the geographical distribution of its credit exposures relevant for the calculation of its countercyclical capital buffer	Pillar III report
b	the amount of its institution specific countercyclical capital buffer	Pillar III report

EBA GL 2016/11 paragraph 72 (Jakso 4.7)	CRR article 440 disclosure requirements are specified in commission delegated regulation (EU) N:o 2015/1555.	Pillar III report
<b>CRR article 441</b>	<b>Indicators of global systemic importance</b>	
	Savings banks amalgamation is not G-SII (Global systemically important Institutions).	Not applicable
<b>CRR article 442</b>	<b>Credit risk adjustments</b>	
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
c	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
e	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:  <hr/> <i>(i)</i> impaired exposures and past due exposures, provided separately; <hr/> <i>(ii)</i> specific and general credit risk adjustments; <hr/> <i>(iii)</i> charges for specific and general credit risk adjustments during the reporting period;	Financial statement's note 16: Impairment loss on loans and other receivables; Financial statements note 20: Loans and receivables; Financial statement's note 5: Risk management and capital adequacy management; Information on industry level is not published due to confidentiality
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:  <hr/> <i>(i)</i> a description of the type of specific and general credit risk adjustments; <hr/> <i>(ii)</i> the opening balances; <hr/> <i>(iii)</i> the amounts taken against the credit risk adjustments during the reporting period; <hr/> <i>(iv)</i> 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; <hr/> <i>(v)</i> the closing balances.	Pillar III report, Financial statement's note 1: Description of the Savings Banks Group and the scope of the financial statement; Financial statements note 2: Accounting policies; Financial statements note 43: Entities consolidated in Savings Banks Group's financial statement

<b>CRR article 443</b>	<b>Unencumbered assets</b>	
RTS 2017/2295	Commission delegated regulation (EU) 2017/2295 specifies disclosure requirements.	Pillar III report
<b>CRR article 444</b>	<b>Use of External Credit Agencies (ECAIs)</b>	
a	the names of the nominated ECAIs and ECAs and the reasons for any changes;	Not applicable because external ratings are not used credit risk capital requirement calculation
b	the exposure classes for which each ECAI or ECA is used;	Not applicable because external ratings are not used credit risk capital requirement calculation
c	a description of the process used to transfer the issuer and issue credit assessments onto items not included in the trading book;	Not applicable because external ratings are not used credit risk capital requirement calculation
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 because external ratings are not used credit risk capital requirement calculation
e	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.	Not applicable because external ratings are not used credit risk capital requirement calculation
<b>CRR article 445</b>	<b>Market risks</b>	
	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 3 report
<b>CRR article 446</b>	<b>Operational risks</b>	
	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 3 report
<b>CRR article 447</b>	<b>Exposures in equities not included to the trading book</b>	
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 39: 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
c	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
e	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 35: Capital and reserves
<b>CRR article 448</b>	<b>Exposure to interest rate risk on positions not included in the trading book</b>	
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
b	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

<b>CRR article 449</b>	<b>Exposure to securitisation positions</b>	
	Savings banks amalgamation does not have securitisation positions.	Not applicable
<b>CRR article 450</b>	<b>Remuneration policy</b>	
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 expenses
c	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 and note 14: Personnel expenses
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
e	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 and note 14: Personnel expenses
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:  (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;	Financial statement's note 14: Personnel expenses
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 paragraph 133 (4.14)	EBA 2015/22 GL	Financial statement's note 4: Corporate governance policies
<b>CRR article 451</b>	<b>Leverage ratio</b>	
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
c	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
e	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 paragraph 134 (4.15)	Leverage ratio disclosure requirements are specified in commission implementing regulation (EU) N:o 2016/200.	Pillar III report
<b>CRR article 452</b>	<b>Use of the IRB Approach to credit risk</b>	
	Savings banks amalgamation is not using IRB to credit risk.	Not applicable
<b>CRR article 453</b>	<b>Use of credit risk mitigation techniques</b>	
a	extent to which the entity makes use of, on- and off- balance sheet netting;	Financial statements note 39: Fair values by valuation technique
b	the policies and processes for collateral valuation and management;	Financial statement's note 5: Risk management and capital adequacy management
c	a description of the main types of collateral taken by the institution;	Pillar 3 report
d	the main types of guarantor and credit derivative counterparty and their creditworthiness;	Pillar 3 report
e	information about market or credit risk concentrations within the credit mitigation taken;	Pillar 3 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 3 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 3 report
<b>CRR article 454</b>	<b>Use of the Advanced Measurement Approaches to operational risk</b>	
	Savings banks amalgamation is not using advanced measurement approaches to operational risk.	Not applicable
<b>CRR article 455</b>	<b>Use of Internal Market Risk Models</b>	
	Savings banks amalgamation is not using internal market risk models.	Not applicable
<b>EBA/ GL/2018/10(10)</b>	<b>Guidelines on disclosure of non-performing and forborne exposures</b>	
a	Credit quality of forborne exposures	Pillar 3 report
b	Credit quality of performing and non-performing exposures by past due days	Pillar 3 report
c	Performing and non-performing exposures and related provisions	Pillar 3 report
d	Collateral obtained by taking possession and execution processes	Pillar 3 report
<b>EBA GL/2020/07</b>	<b>Guidelines on Covid -19 measures reporting and disclosure</b>	<b>Not applicable on Pillar 3 disclosure</b>



Savings Bank