



# **vestjyskBANK**

## **Risk report Addendum**

## Introduction

The present risk report addendum has been prepared in accordance with the provisions set out in the Danish Executive Order on the Determination of Risk Exposures, Capital Resources and Solvency Needs (bekendtgørelse om opgørelse af risikoeksponeringer, kapitalgrundlag og solvensbehov).

Risk report addenda are prepared quarterly in conjunction with the publication of the Bank's solvency need and are posted to the Bank's website. Complete risk reports are published once annually in conjunction with the publication of the Bank's annual report for the previous year. In our assessment, both the published information and the frequency of publication are appropriate in relation to the Bank's risk exposures. The disclosures have not been audited by internal or external auditors.

## Adequate own funds and individual solvency need

Adequate own funds and individual solvency need are distributed across the risk areas below.

<b>Calculation of the consolidated solvency need at 31 March 2014</b>	<b>Amount in TDKK</b>	<b>%</b>
1 Column I requirement (8 % of risk-weighted items)	1,566,354	8.00
+2 Earnings (capital for risk coverage as a result of weak earnings)	0	0.00
+3 Growth in loans (capital to cover organic growth in business volume)	0	0.00
+4 Credit risks, of which		
4a Credit risks for large customers (2 % of own funds) with financial problems	455,956	2.33
4b Other credit risks	76,004	0.39
4c Concentration risk of individual commitments	17,020	0.08
4d Concentration risk by industry segments	0	0.00
+5 Market risk, of which		
5a Interest rate risk	42,965	0.22
5b Equity risk	0	0.00
5c Exchange rate risk	0	0.00
+6 Liquidity risk (capital for coverage of more expensive liquidity)	0	0.00
+7 Operational risk (capital for coverage of operational risk in addition to Column I)	0	0.00
+8 Any supplementary items as a result of statutory requirements	0	0.00
<b>Total capital need/solvency need</b>	<b>2,158,299</b>	<b>11.02</b>

## Commentary on solvency need

### Column I requirement (8 % of risk-weighted items)

vestjyskBANK is subject to the requirement set out in section 124(2)(1) of the Danish Financial Business Act that solvency must, at a minimum, constitute 8 % of risk-weighted items.

### Credit risk

Credit risk covers the risk of losses from debtors or counterparties defaulting on their payment obligations, apart from what is covered by Column I, including large customers with financial problems, concentration risk across individual commitments and industry segments.

### **Large customers with financial problems**

For large customers with financial problems, assessments are made based on the cautiously estimated loss for the individual commitment. Customers with financial problems comprise the following:

- Customers with objective indication of value impairment, credit quality category 1,
- Customers with material signs of weakness but without objective indication of value impairment, credit quality category 2c.

Large commitments are commitments constituting at least 2 % of own funds.

The cautiously estimated loss represents the “net loss” that, based on a cautious and prospective assessment, may be lost if major commitments with customers with financial problems have to be settled due to payment default.

### **Other credit risks**

The Bank performs an assessment of whether special credit risks exist in the general credit portfolio (commitments below 2 % of own funds) not covered by the Column I requirement. For these commitments, the Bank has assessed that it will add a supplementary TDKK 76,004.

### **Concentration risk across individual commitments**

Concentration risk across individual commitments represents the risk associated with the distribution across commitment amounts in the loan portfolio. The Bank determines the supplementary amount for concentration risk across individual commitments based on the Financial Supervisory Authority’s “Guidelines on Adequate Capital Base and Solvency Needs of Credit Institutions.” In accordance with these guidelines, amounts must be added if the sum of the 20 largest commitments is greater than 4 percent of the commitment mass.

A supplement is required because the 20 largest commitments constitute 12 percent. The Bank has calculated a supplement of TDKK 17,020.

### Concentration risk by industry segments

The concentration risk by industry segments covers risk associated with commitments' distributed across relatively few industry segments. The Bank determines the supplementary amount for concentration risk across industry segments on the Financial Supervisory Authority's "Guidelines on Adequate Capital Base and Solvency Needs of Credit Institutions." In accordance with these guidelines, the Bank uses the Herfindahl-Hirschman Index (HHI) to measure the degree of concentration across industry segments. Based on the HHI, the supplement is calculated as set out in the table on below.

HHI	Supplement for adequate own funds/solvency need
HHI < 20 %	0
20 % < HHI < 25 %	$0.008 * RWAbusiness * (1 - SRbusiness)$
25 % < HHI < 30 %	$0.016 * RWAbusiness * (1 - SRbusiness)$
30 % < HHI < 40 %	$0.024 * RWAbusiness * (1 - SRbusiness)$
40 % < HHI < 60 %	$0.032 * RWAbusiness * (1 - SRbusiness)$
60 % < HHI < 100 %	$0.040 * RWAbusiness * (1 - SRbusiness)$

A supplement is not added because vestjyskBANK's HHI has been calculated at 19.54 %.

### Market risk

The market risk is the risk of losses because of potential changes in interest rates, equity prices as well as foreign exchange rates, apart from what is covered in Column I. It is not based on vestjyskBANK's current risk but on the maximum risk vestjyskBANK may assume within the limits established by the Supervisory Board for the Executive Board's powers to assume market risks under section 70 of the Danish Financial Business Act.

The Bank bases its assessment on whether all market risks have been adequately covered by Column I on the Financial Supervisory Authority's indicative benchmarks for interest rate risk, equity risk and foreign exchange rate risk. Based on these benchmarks as well as on an overall assessment of the Bank's market risks, it is the Bank's assessment that a supplement of TDKK 42,965 is required for market risks. Apart from the Column I requirement, the supplement for market risk can be attributed to the interest rate risk for the Bank's fixed-rate deposits and subordinated debt. Market risk is primarily calculated by means of stress testing.

### Operational risk

Operational risk comprises risk of losses resulting from inappropriate or defective internal procedures, human or system-related errors as well as external events, including legal risks, in addition to what is covered by Column I.

In assessing supplements for operational risks, the Bank considers these risk areas, including the Bank's organisation, cyber security and IT operations as well as the Bank's business model. On that basis, apart from what is covered in Column I, it is the Bank's assessment that a supplement is not needed.

### **Other risks**

The Bank has performed an assessment of whether capital provisions should be made for hedging the risk of weak earnings, of organic growth in business volume and of more expensive liquidity from professional investors. It is the assessment that there is no need to make capital provisions for covering other risks.

### **Earnings**

The Bank has based its assessment of whether extra capital provisions should be made to counter prospective credit losses on the Financial Supervisory Authority's relevant indicative benchmarks. The Bank performed its assessment of core earnings in relation to total loans and guarantees. It is the assessment that there is no need to make capital provisions for covering weak earnings.

### **Growth**

The Bank has based its assessment of whether extra capital provisions should be made for a growth in loans on the Financial Supervisory Authority's relative indicative benchmarks. It is the assessment that there is no need to make capital provisions for covering a growth in loans.

### **Liquidity**

The Bank has a high liquidity surplus. In assessing whether capital provisions should be made as a result of additional costs related to raising liquidity, the Bank bases its estimate on the Bank's stress testing of liquidity for a one-year term. It is the assessment that there is no need to make capital provisions for raising liquidity.

### **Statutory requirements**

The Bank issued a company announcement on 1 April 2014 regarding its failure to meet the solvency requirements under the new CRD IV rules that had just entered into force for determining the solvency of banks. On that date, the Bank calculated its estimated solvency ratio at approx. 10.0 per cent compared with an estimated individual solvency need of 10.9 per cent. In consequence of this solvency shortfall, the Financial Supervisory Authority (FSA), cf. the same company announcement, has established a solvency requirement of 10.9 per cent and ordered the Bank to implement certain transactional restrictions, such as not to pay out dividends or interest for the Bank's already-issued own funds elements and refrain from assuming any new major risks. Additionally, the Bank has been ordered to draft a so-called restoration plan. This plan was submitted to the FSA on 7 April 2014 and details various measures targeted at strengthening the Bank's solvency. Realising the measures to meet the current solvency need of 11 per cent requires the approval of both the FSA and the European Commission. No actual time limit has been established for meeting this need but the FSA is updated regularly regarding the realisation, in full or in part, of the plan.

## Own funds and solvency ratio

The Bank's own funds and solvency ratio, is detailed in the table below.

### Own funds and solvency ratio at 31 March 2014

	TDKK	%
Own funds/solvency ratio	1,993,934	10.2
Adequate own funds/solvency need	2,158,299	11.0
<b>Solvency shortfall</b>	<b>-164,365</b>	<b>-0.8</b>

The solvency shortfall was calculated at 0.8 %, or TDKK 164,365. At 31 December 2013 the surplus was calculated at 0.4 %, or TDKK 67,143.

Implementation of the new CRD IV solvency requirements has led to modifications in the calculation of own funds and weighted items. The statement of 31 December 2013 was calculated under the rules as they applied then, which means that the two calculations are not directly comparable.

The Bank Management is continuing its initiatives to implement the action plan detailed in the 2013 Financial Statements. Moreover, the Management is also targeting its efforts on the restoration plan for the Bank's solvency in regular dialogue with the relevant government agencies.

### Concluding remarks

For supplementary disclosures relating to risk management, please see the Bank's complete 2013 Risk Report as well as its 2013 Annual Report posted at [www.vestjyskbank.dk](http://www.vestjyskbank.dk).

The risk report will be updated in conjunction with the publication of the 2014 Annual Report.

