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Betri Banki P/F

Risk Report 2020



Contents

1 Introduction	4	5 Market Risk	17
2 Risk Management	4	5.1 Objective and risk policy	17
2.1 Risk Statement	4	5.1.1 Interest rate risk	17
2.2 Risks	5	5.1.2 Equity risk	17
2.3 Division of responsibility	5	5.1.3 Foreign exchange risk	17
2.3.1 Risk Management function	6	5.1.4 Other price risks	17
		5.1.5 Reporting and division of responsibility	17
3 Capital and solvency requirement	7	5.2 Market risk exposures	17
3.1 Own funds and solvency	7	5.2.1 Risk-weighted exposures with market risk	17
3.2 Solvency requirement	7	5.2.2 Exposures in securities not included in the trading book	17
3.3 Leverage ratio	9	5.2.3 Interest rate risk not included in the trading book	18
4 Credit Risk	9	6 Liquidity Risk	19
4.1 Objective and risk policy	9	6.1 Objective and risk policy	19
4.1.1 Authority and division of responsibility	9	6.1.1 Reporting and division of responsibility	19
4.1.2 Credit management and control	9	6.2 Encumbered assets	20
4.1.3 Collaterals	9	7 Operational Risk	21
4.1.4 Risk concentration	10	7.1 Objective and risk policy	21
4.1.5 Impairments	10	7.1.1 Reporting and division of responsibility	21
4.1.6 Rating of customers	10	7.2 Operational risk exposures	21
4.1.7 Customers	10	Appendix 1: Leverage ratio - disclosure template ..	22
4.1.8 Circumstances that are considered when granting credit ...	10	Appendix 2: LCR - disclosure template	25
4.2 Credit risk exposures	11		
4.2.1 Risk-weighted exposures and capital requirements	11		
4.2.2 Credit risk exposures	11		
4.2.3 Past due and impaired claims	14		
4.2.4 Financial collateral	15		
4.3 Counterparty risk - derivatives	16		
4.4 ECAI	16		



Risk Report

Betri Banki P/F

1 Introduction

The aim of this risk report is to provide an insight into Betri Banki P/F's capital and risk management practices.

The report has been prepared in accordance with the legal disclosure requirements in *Executive Order No 900 of 13 July 2015 for the Faroe Islands on Calculation of Risk Exposures, Own Funds and Solvency Need* and the *Capital Requirements Regulation (CRR) (Regulation (EU) No 575/2013 of 26 June 2013 on prudential requirements for credit institutions and investment firms)*. Betri Banki is part of the Betri Group and is therefore included in Betri P/F's risk report. As a SIFI institute of material significance in the Faroe Islands, the bank has chosen to publish an individual risk report for the bank.

The information in this risk report relates to Betri Banki P/F.

The risk report is published annually when the bank's annual report is released. The risk report is available on the bank's webpage www.betri.fo.

The risk report is a separate unaudited document.

The risk report is also available in Faroese. In the event of any discrepancy between the Faroese and the English version, the Faroese version shall prevail.

2 Risk Management

Betri Banki assumes risk based on the business model and the strategic objectives set by the Board of Directors.

The Board of Directors approves risk management policies

for the various areas in the bank based on the business model and the strategic objectives; and provides the Executive Board with authorities within these risk areas.

The purpose of Betri Banki's risk management is to ensure that the bank does not take on more risks than stipulated by the Board of Directors, and that the risk profile is appropriate in relation to the bank's own funds.

2.1 Risk Statement

The Board of Directors approved this risk report on 23 February 2021.

The Board of Directors finds that Betri Banki's risk management is appropriate in relation to the bank's business model and business strategy. Also, the Board of Directors considers the description below of the bank's overall risk profile associated with the business strategy to give an accurate view of the risk management in the bank.

The statement from the Board of Directors is based on the business model, material and reports submitted to it by the Executive Board, Internal Audit, Risk Manager and Compliance Officer, as well as supplementary information or statements obtained by the Board of Directors.

A review of the business model and policies shows that the overall requirements for the individual risk areas are reflected in policies and instructions from the Board of Directors to the Executive Board.

Betri Banki's business model is based on the bank's vision and mission. Betri Banki strives to be the preferred banking choice of the Faroese people and to create opportunities and secure financial affairs for its customers. The bank also wants to offer customers a wide range of traditional banking services. Sensible risk management and healthy business operations are important factors in managing the bank soundly. The Board

of Directors wants growth to be steady in order to manage risks on sustainable and safe foundations. Risk diversification ensures that risks are not concentrated on individual customers or branches.

Betri Banki wants to maintain safe and robust own funds that support the business model and ensure independence at all times. At year-end 2020, the bank's solvency ratio was 29.5%. The solvency requirement was 10.4% and buffer requirements amounted to 6.5%.

The risk appetite determined by the Board of Directors is managed via the limits specified in individual policies, as well as limits in the instructions to the Executive Board.

The Board of Directors also addresses the limits set in the supervisory diamond from the Danish FSA. The table below shows the maximum limit values of the supervisory diamond and the bank's compliance at year-end 2020.

Table 1: Supervisory diamond from the Danish FSA

	Limit value	Betri Banki
Sum of large exposures	< 175%	110.8%
Lending growth	< 20%	1.87%
Real property exposure	< 25%	4.94%
Funding Ratio	< 1.0	0.65
Liquidity requirement – Supervisory Diamond	> 100%	199.5%

The review also shows that the actual risks are within the limits laid down in policies and delegated authorities, and based on this the Board of Directors finds that there is consistency between the business model, policies, guidelines and the actual risks within the individual areas.

Further information and key ratios regarding the risk profile can be found in this risk report and the bank's annual report.

2.2 Risks

In the daily operations Betri Banki is exposed to the following risks:

Credit risk, defined as the risk of financial losses arising from counterparties or debtors failing to meet all or part of their payment obligations.

Market risk, defined as the risk of the market value of assets and liabilities, as well as off-balance items, being affected because of changes in market conditions. Betri Banki's market risk is divided into interest rate risk, equity risk, foreign exchange risk and other price risks.

Liquidity risk, defined as the risk that arises from differences in scheduled outgoing and incoming cash flows in the bank.

Operational risk, defined as the risk arising from inadequate

and inefficient internal processes, human errors, IT-failures and external factors, including legal risks.

2.3 Division of responsibility

The Board of Directors adopts risk policies for the various risk areas based on the business model and the strategic objectives of the bank. The Board of Directors also determines guidelines for management and control of risks in the bank. The Board of Directors reviews the individual risk policies annually.

The Board of Directors is responsible for ensuring that the bank is organised appropriately and risk policies and limits being established for all risk areas. In addition, all major credit facilities must be submitted to the Board of Directors for approval. The Board of Directors receives regular reports, enabling it to check compliance with risk policies and pre-defined limits.

The Board of Directors regularly, and at least annually, makes an assessment of the bank's individual and overall risks. At the same time, it is also determined whether the risks are acceptable.

The bank's risk management arrangements are also discussed in the Risk Committee and the Audit Committee. Both committees comprise the entire Board of Directors. The Audit Committee monitors accounting and auditing matters, as well as the internal control system. The Risk Committee assesses the bank's current and future risk profile and strategy, and ensures implementation of the risk strategy in the bank.

The Executive Board is responsible for the day-to-day management of the bank, and must ensure that the bank is managed according to adopted policies, guidelines and authorities that have been granted in relation to the different risk areas.

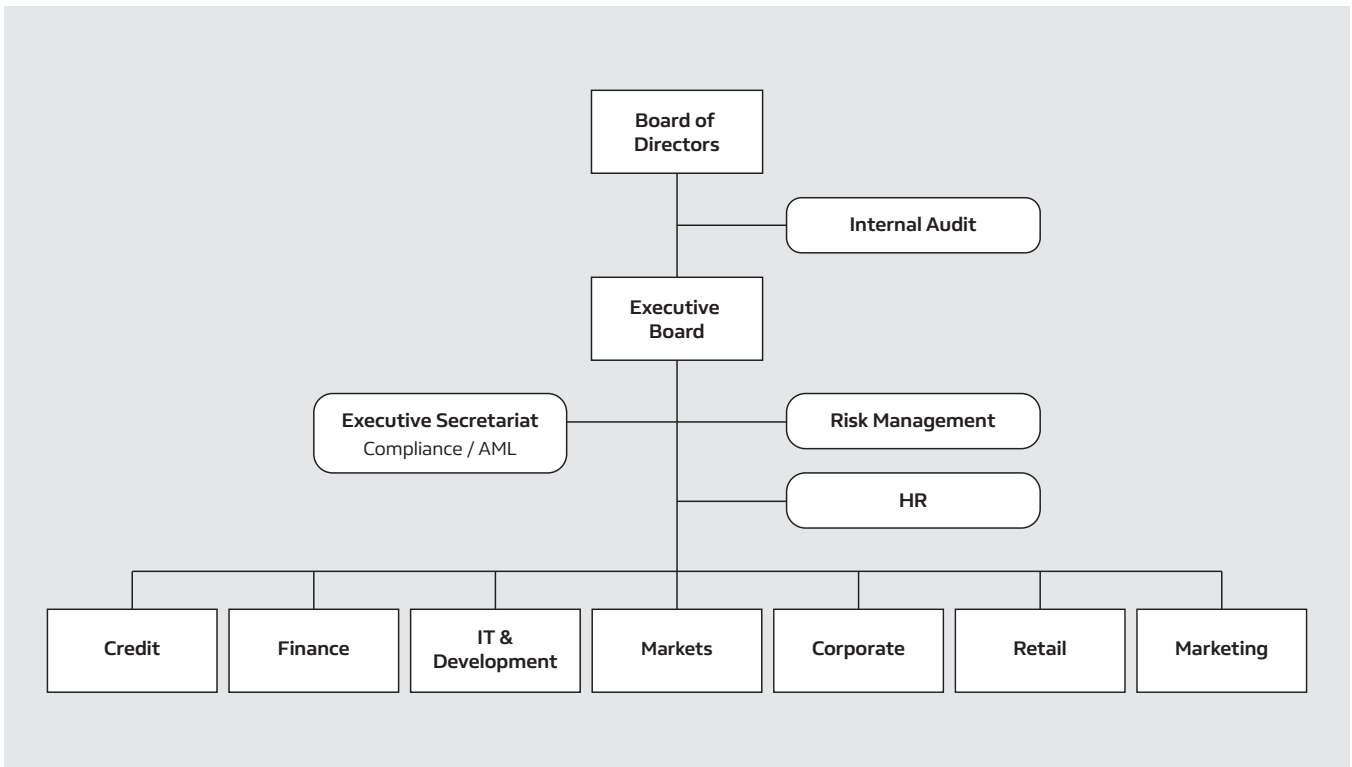
The Executive Board reports regularly to the Board of Directors on the development of risk exposures and pre-defined limits.

General management and control of risks is centralised with organised reporting to the Executive Board and Board of Directors. Daily management, control and reporting are carried out in separate business units in the bank.

Further information regarding governance arrangements pursuant to CRR Article 435 (2) and remuneration policy pursuant to CRR Article 450 can be found in the bank's annual report and on the bank's webpage.

Betri Banki's organisational structure is illustrated on the following page.

Figure 1: Organisational structure



2.3.1 Risk Management function

The bank has a separate risk management function. The Risk Manager heads the risk management function and reports to the Executive Board.

Risk Management monitors credit risk, market risk, liquidity risk and operational risk on behalf of the Executive Board. This also includes monitoring risks across various risk areas and organisational units, in addition to risks deriving from outsourced functions. Risk monitoring is performed in accordance with the tasks of the risk management function as stipulated in section 71 of the *Financial Business Act* and *Executive Order No. 902 of 13 July 2015 for the Faroes on the management and control of banks etc.*

Each year Risk Management prepares a plan for the coming year’s activities. The annual plan is approved by the Executive Board.

Risk Management reports to the Executive Board every quarter on the risks that are associated with the bank’s operations. In addition to this, Risk Management reports to the Board of Directors annually and attends meetings in the Risk Committee. The Risk Committee held four meetings in 2020.

3 Capital and solvency requirement

The European capital requirement rules apply to Faroese banks. CRD IV and CRR are the European implementation of the Basel III framework.

Betri Banki has been identified as a systemically important financial institution (SIFI) in the Faroe Islands. SIFI institutions are subject to more rigorous supervision by the FSA. SIFI institutions are also subject to additional requirements, e.g. additional solvency requirements. Betri Banki must comply with a SIFI buffer requirement of 2%.

Banks in the Faroe Islands are also subject to a capital conservation buffer, which was 2.5% in 2020. In addition to this, banks may also be required to reserve capital for countercyclical fluctuations in the economy, as well as requirements that enhance the banks' resilience to large fluctuations in the Faroese economy.

To address fluctuations in the Faroese economy, the Danish Systemic Risk Council has, in consultation with Faroese authorities, recommended an additional systemic buffer of 2% in 2020.

The countercyclical buffer for the Faroes, which is fixed every quarter by the Danish Minister for Industry, Business and Financial Affairs, has so far been fixed at 0%.

The bank's risk weighted exposures are almost exclusively to the Faroese market; therefore, the bank only considers buffer requirements imposed in the Faroe Islands.

The table below shows the buffers that Betri Banki must comply with.

Table 2: Buffer requirements

	Year-end 2020
SIFI-buffer - Betri Banki	2.000%
Capital conservation buffer	2.500%
Systemic buffer - fluctuations in the economy	2.000%
Countercyclical buffer, maximum 2.5%	0.000%
Total buffer requirements	6.500%

As of 1 January 2021, Betri Banki was subject to buffers amounting to 6.5%, which is added to the solvency requirement.

Furthermore, the Danish FSA has issued minimum requirements for own funds and eligible liabilities (MREL). On 21 December 2020, the MREL requirement for Betri Banki was set at 31.7% of risk-weighted exposures. The requirement is adjusted every year. Betri Bank has been informed that there will be a transition period up until July 2025, which means that the requirement must be met gradually by July 2025.

3.1 Own funds and solvency

Own funds are calculated in accordance with the *Capital Requirements Regulation* in addition to guidelines on adequate capital base and solvency requirement for credit institutions (*Vejledning om tilstrækkeligt kapitalgrundlag og solvensbehov for kreditinstitutter*) issued by the Danish FSA.

Solvency is calculated as own funds as a percentage of the risk-weighted assets. Own funds and the weighted assets are calculated in accordance with *the Capital Requirements Regulation*.

The risk-weighted assets are divided into three main categories: credit risk, market risk and operational risk.

The table below shows the bank's solvency statement.

Table 3: Solvency statement as of 31 December 2020 (DKK 1,000)

Tier 1 Capital	1,810,238
Own funds	1,810,238
Credit risk - weighted assets not included in trading portfolio including off balance items	4,884,467
Market risk - weighted items	703,580
Operational risk	558,507
Total risk weighted assets	6,146,554
Total capital ratio	29.5%
T1 Capital ratio	29.5%
Capital demand	
Core Capital before statutory deductions	1,813,235
Proposed dividend	0
Deductible deferred tax assets	0
Value adjustments due to the requirements for prudent valuation	2,997
Tier 1 Capital	1,810,238
Supplementary capital	0
Own Funds	1,810,238

Betri Banki P/F has not used the transitional arrangement in CRR Article 468.

3.2 Solvency requirement

The bank's approach to assessing whether the capital is sufficient to support current and future activities (the solvency requirement) follows the bank's ICAAP (Internal Capital Adequacy Assessment Process).

The risks that the bank is exposed to are identified in the ICAAP, and the risk profile is assessed. When the risks are identified, an assessment is made of how they can be reduced, e.g.

via processes, contingency plans etc. Finally, an assessment is made to determine which risks are to be covered by capital.

The solvency requirement is the bank's own assessment of the capital requirement attributable to the risks assumed by the bank. The Board of Directors has quarterly discussions to determine the solvency requirement to ensure that it is sufficient to support the bank's activities. The discussions are based on a recommendation from the Executive Board. The recommendation contains a proposal on the bank's solvency requirement.

In addition, the Board of Directors annually discusses the method of calculation of the bank's solvency requirement.

The solvency requirement is calculated using an 8+ approach, where capital is reserved within the risk areas; credit risk, market risk, operational risk, other risks and supplements due to statutory requirements. The solvency requirement is calculated using the bank's risk profile, capital position and considerations regarding the future, which can be of significance, including the budget.

The calculation of the bank's solvency requirement is based on a model developed by the Association of Local Banks (The Association of Local Banks, Savings Banks and Cooperative Banks in Denmark) and on guidelines on adequate capital base and solvency requirement for credit institutions issued by the Danish FSA.

The model developed by the Association of Local Banks and the guidelines from the Danish FSA are both based on the 8+ approach (table 4), where the basis is a minimum requirement of 8% of the risk-weighted items (Pillar I). A supplement is added for risks and circumstances, which are not fully reflected in the calculation of the risk-weighted items.

Using the model developed by the Association of Local Banks and the guidelines issued by the Danish FSA, the bank considers the calculated solvency requirement to be fair.

Table 4 shows the 8+ approach that is used when calculating the solvency requirement.

Table 4: Solvency requirement based on the 8+ approach

1) Pillar I requirement (8% of the risk-weighted items)
+ 2) Earnings (capital for risk coverage due to weak earnings)
+ 3) Growth in lending (capital to cover organic growth in business volume)
+ 4) Credit risk, of which:
4a) Credit risk on major customers with financial problems
4b) Other credit risks
4c) Concentration risk on individual exposures
4d) Concentration risk on industries
+ 5) Market risk, of which
5a) Interest rate risk
5b) Equity risk
5c) Foreign exchange risk

+ 6) Liquidity risk (capital to cover more expensive liquidity)
+ 7) Operational risk (capital to cover operational risk in excess of Pillar I)
+ 8) Leverage (capital to cover risk related to excessive leverage)
+ 9) Possible supplement caused by regulatory maturity of capital instruments
+ 10) Possible supplement due to statutory requirements
Total = Capital requirement / Solvency requirement
- of which credit risk (4)
- of which market risk (5)
- of which operational risk (7)
- of which other risks (2+3+6+8+9)
- of which supplement due to statutory requirements (1+10)

The bank considers the risk factors included in the model to be adequate to cover all risk areas, which the bank's management is required by law to take into account when determining the solvency requirement as well as the risks that the management finds that the bank has assumed.

In addition, the Board of Directors and management must assess whether own funds are adequate to support future activities. In Betri Banki, this assessment is part of the assessment of the solvency requirement.

The bank has reserved additional capital for credit risk, market risk and operational risk, which are not fully reflected in the Pillar I requirement of 8% of the risk-weighted items.

Credit risk: A supplement has been added to the Pillar I requirement (8%) to take into account credit risk on major customers with financial problems, other credit risks and concentration risk on individual exposures.

Market risk: A supplement has been added to the Pillar I requirement (8%) to take into account credit spread risk.

Operational risk: A supplement has been added to the Pillar I requirement (8%) at the request of the Danish FSA following an inspection.

The table below shows the bank's individual solvency requirement.

Table 5: Adequate own funds and solvency requirement as of 31.12.2020

Risk area	Adequate own funds DKK 1,000	Solvency requirement
Statutory requirements	491,724	8.00%
Credit risk	87,808	1.43%
Market risk	42,975	0.70%
Operational risk	18,440	0.30%
Other risks	0	0.00%
Total	640,947	10.43%

At year-end 2020, Betri Banki's capital ratio was 29.5% (DKK 1,810 million). The solvency requirement was 10.4%, and buffer requirements amounted to 6.5%-points.

3.3 Leverage ratio

The leverage ratio is calculated as the Tier 1 capital divided by the total unweighted exposures.

A threshold value for the leverage ratio has not yet been introduced by legislation. In a proposal for a revision of the CRD IV and CRR, the European Commission has proposed a limit of 3%, equal to a maximum leverage of 33 times the Tier 1 capital.

At year-end 2020, the bank's leverage ratio was 16.42%.

The leverage ratio is monitored and reported regularly to the Board of Directors.

The leverage ratio disclosure template pursuant to CRR Article 451 is included in appendix 1.

4 Credit Risk

Betri Banki's credit risk is described below, including objective, policy and credit risk exposures.

4.1 Objective and risk policy

Betri Banki offers loans, credits, guarantees and other services as part of its business model and thereby incurs credit risk. Credit risk is defined as the risk of financial losses arising from counterparties or debtors failing to meet all or part of their payment obligations.

The Board of Directors of Betri Banki has adopted a credit policy, which is prepared in accordance with the *Financial Business Act* and *Executive Order No. 902 of 13 July 2015 for the Faroes on the management and control of banks etc.* The credit policy defines the principles that apply to the bank's management of credit risks, taking into account the bank's business organisation, area of operation and the framework established by the Danish FSA.

The credit policy is updated, if the bank, for example, wants to change the credit terms because of external or internal changes that could affect the creditworthiness of customers. Such factors may be that the bank changes its terms with regard to financing certain customer groups.

The Board of Directors reviews the credit policy at least annually.

4.1.1 Authority and division of responsibility

Lending authorities are provided according to competence and needs, and with regard to the bank's risk profile. The Board of Directors has provided the Executive Board with lending authorities, which have, in part, been delegated to the

Head of Credit, who delegates lending authorities to relevant employees.

Betri Banki's credit granting is overseen by the Credit Department, which regularly checks compliance with the credit policy and lending authorities.

The Credit Department is responsible for day-to-day credit granting. This includes developing credit assessment tools, such as rating of customers and drawing up procedures for credit granting and value assessment of collateral. The Credit Department must also ensure compliance with limits regarding e.g., customer concentration and industry concentration. The Credit Department is in charge of the bank's valuation of loans and impairment procedures, in addition to credit risk management, including monitoring the development in overdrafts and arrears.

The Credit Department reports to the Executive Board on developments in the bank's credit risk and whether the respective branches operate within their lending authorities and comply with the bank's credit policy. The Executive Board presents this report to the Board of Directors on a quarterly basis.

4.1.2 Credit management and control

Credit is granted based on the individual customer's financial situation with regard to the ability and attitude to repay the loan, as well as on collaterals. As a general rule, credit is not granted solely on the basis of collateral.

The Credit Department supervises the bank's credit systems and credit granting processes. The Credit Department has higher lending authorities than the individual branches and is therefore involved in the granting of larger credit facilities, as well as more complicated exposures.

Customer advisers, together with their branch manager, are responsible for the daily credit control.

Credit exposures above a certain size are submitted to the Board of Directors for renewal annually. Credit applications must include the customer's financial situation and the conditions for the exposure to be continued by the bank.

The bank's Credit Department must ensure that the annual renewal is performed on time and properly, however, the respective branches, where the customer is registered, are responsible for the exposures being submitted for renewal.

The quality of the overall loan portfolio is assessed by the Credit Department in connection with the annual review of assets. This review is presented to the Executive Board and the Board of Directors.

4.1.3 Collaterals

To reduce credit risk the bank requires collaterals. The types of collateral most frequently provided are real estate, ships, financial collateral and personal property.

The value of the collateral is estimated using set procedures, thus ensuring uniform estimations. The bank regularly assesses the value of the collateral provided. The value of the collateral is determined from the price that would be obtained in a sale.

The bank's agreements with customers on collateral ensure that the bank can realise the collateral in the event of customers defaulting on their payment obligations.

The bank uses the financial collateral comprehensive method as its credit risk mitigation technique for computing its capital ratio. This means that the bank can reduce a commitment's strain on the capital by accepting certain financial items as collateral.

The CRR specifies which items are eligible as collateral under the financial collateral comprehensive method. To be eligible the financial collateral must be issued by a company or country with a particularly good rating.

Under the limitations of the CRR, the bank accepts the following main categories of financial collateral: deposits, bonds/debt securities and equities.

4.1.4 Risk concentration

In order to ensure diversification in the loan portfolio, the credit policy stipulates that no single exposure, with deduction of certain guaranteed claims and collaterals received, must generally be higher than 10% of the bank's own funds. Additionally, it is the bank's aim that the total amount of the 20 largest exposures does not exceed 175% of own funds.

In addition to these limits, the bank aims for an even distribution between retail and corporate lending, and no single industry should account for more than 10% of the bank's total gross loans, except for local authorities and the public sector where the limit is 20%.

4.1.5 Impairments

The bank adheres to the *Executive Order for the Faroes on Financial Reports for Credit Institutions and Investment Firms etc.* and uses the accounting definition of non-performing and impaired exposures as defined in the abovementioned executive order.

According to IFRS 9, expected credit losses on all financial assets recognized at amortized cost are impaired, and provisions are made according to the same rules for expected credit losses on unutilized credit lines, loan commitments and financial guarantees.

A description of the impairment method used by the bank can be found in the section on impairments in "Significant accounting policies" in the bank's annual report.

In relation to the IFRS 9 rules, which became effective on 1 January 2018, it was possible to apply a 5-year transitional

arrangement when calculating own funds. It was voluntary for banks to apply the transitional arrangement. Betri Banki decided not to apply the transitional arrangement.

4.1.6 Rating of customers

The bank uses a rating model to describe the credit quality of individual customers. The rating model is used for credit granting, selection of customers to be reviewed for impairments and conditions for the frequency in single customer follow-ups.

The bank uses the following rating categories:

- 3 Unconditionally good customers
- 2a Good customers
- 2b Average customers
- 2c Weak customers
- 1 Customers with OEI (objective evidence of impairment)

4.1.7 Customers

The bank's market segment is Faroese retail, corporate and public sector customers with good repayment abilities.

4.1.8 Circumstances that are considered when granting credit

The bank considers credit applications based on an assessment of the individual customer's financial situation.

Retail customers: Credit granting is based on the customer's personal income and assets, in addition to disposable income, debt factor etc.

Corporate customers: Credit granting is based on the company's revenues, solidity, state of collateral, in addition to the owner's experience and willingness to repay the loan.

Jyske Realkredit: Betri Banki collaborates with Jyske Realkredit providing mortgage credit loans for Faroese homeowners. The agreement stipulates that Betri Banki handles all customer communication, conducts customer ratings and forwards loan applications to Jyske Realkredit. Jyske Realkredit provides financing for up to 80% of the market value of properties.

4.2 Credit risk exposures

This section shows credit risk exposures, risk-weighted items and capital requirements as of 31.12.2020.

4.2.1 Risk-weighted exposures and capital requirements

The table below shows risk-weighted items and capital requirements for credit risk, broken down by exposure groups.

Table 6: Risk-weighted exposures in relation to credit risk (DKK 1,000).

Exposure group	Risk-weighted items	Capital req. 8%
Central governments or central banks	0	0
Local authorities	0	0
Public sector entities	389,116	31,129
Financial institutions	38,721	3,098
Retail customers	841,237	67,299
Corporate customers	1,710,391	136,831
Exposures secured by mortgage in real estate	1,034,739	82,779
Exposures with arrears or overdrafts	674,267	53,941
Exposures in other items, including assets without counterparties	158,970	12,718
Covered bonds	0	0
Equity exposures	37,025	2,962
Total	4,884,467	390,757

4.2.2 Credit risk exposures

Total value of the exposures after value adjustments and before considering credit risk reduction was DKK 9,341 million.

The table below shows the exposures after value adjustments and impairments before credit risk reduction.

Table 7: Exposures after value adjustments before credit risk reduction (DKK 1,000).

Exposure group	Exposure after value adjustment	Average exposure during the year after value adjustment
Governments or central banks	334,488	403,195
Local authorities	500,604	477,730
Public sector entities	546,583	541,814
Financial institutions	193,405	197,877
Retail customers	1,624,829	1,661,745
Corporate customers	2,384,843	2,423,397
Exposures secured by mortgage in real estate	2,974,388	2,869,259
Exposures with arrears or overdrafts	553,221	667,615
Exposures in other items, including assets without counterparties	191,572	199,318
Covered bonds	0	0
Equity Exposures	37,025	36,963
Total	9,340,959	9,478,913

The bank has chosen not to provide information on the geographical spread of the exposures, as the bank's credit exposure is almost exclusively to the Faroese market.

The table below shows the exposures in accordance with CRR regulations, broken down by industry. The table also shows the breakdown between retail customers and corporate customers.

Table 8: Exposures after value adjustments broken down by industry (DKK 1,000).

Industries	Central govern-ments or central bank	Local authori-ties	Public sector entities	Finan-cial insti-tutions	Retail custom-ers	Corporate custom-ers	Expo-sures se-cured by mortgage in real estate	Expo-sures with arrears or over-drafts	Expo-sures in other items, includ-ing assets without counter-parties	Covered bonds	Equity Expo-sures	Total
Public authorities	0	500,298	508,753	0	866	11,474	9,981	2,947	6	0	0	1,034,324
Agriculture, hunt-ing, forestry and fishing	0	0	0	0	29,175	551,255	2,788	20,613	0	0	0	603,831
Industry and raw materials extrac-tion	0	0	0	0	71,207	457,917	5,704	59,360	0	0	0	594,188
Energy supply etc.	0	0	0	0	0	0	0	0	0	0	0	0
Building and con-struction	0	0	39,896	0	141,785	262,701	15,502	4,109	0	0	0	463,994
Trade	0	0	0	0	118,221	484,560	16,683	54,403	0	0	0	673,868
Transport, restau-rants and hotels	0	0	0	0	61,748	268,155	5,902	153,757	0	0	0	489,562
Information and communication	0	0	0	0	5,536	13,219	56	2,419	0	0	0	21,229
Finance and insur-ance	334,048	0	0	193,405	16,156	40,669	901	496	0	0	0	585,675
Real estate	0	0	0	0	80,192	244,901	21,692	17,268	0	0	0	364,053
Other industries	440	306	-2,065	0	101,292	38,580	17,637	14,916	191,567	0	37,025	399,697
Total corporate	334,488	306	37,831	193,405	625,312	2,361,957	86,866	327,341	191,567	0	37,025	4,196,097
Retail	0	0	0	0	998,651	11,413	2,877,540	222,933	0	0	0	4,110,538
Total	334,488	500,604	546,583	193,405	1,624,829	2,384,843	2,974,388	553,221	191,572	0	37,025	9,340,959

The table below shows the residual maturity of credit exposures.

Table 9: Credit exposures after value adjustments broken down by residual maturity (DKK 1,000).

Exposure group	On demand	0-3 months	3 months – 1 year	1-5 years	Over 5 years	Total
Central governments or central banks	149,560	184,928	0	0	0	334,488
Local authorities	1,005	45,977	12,797	9,275	431,549	500,604
Public sector entities	119,059	220	89,090	17,955	320,260	546,583
Financial institutions	187,473	1,497	478	938	3,019	193,405
Retail customers	123,369	58,685	193,787	361,902	887,086	1,624,829
Corporate customers	346,003	45,554	302,026	427,204	1,264,057	2,384,843
Exposures secured by mortgage in real estate	473,251	19,556	29,894	235,417	2,216,271	2,974,388
Exposures with arrears or over-drafts	21,842	6,780	5,325	71,001	448,273	553,221
Exposures in other items, including assets without counterparties	191,572	0	0	0	0	191,572
Covered bonds	0	0	0	0	0	0
Equity Exposures	37,025	0	0	0	0	37,025
Total	1,650,159	363,196	633,396	1,123,693	5,570,514	9,340,959

4.2.3 Past due and impaired claims

This section shows past due exposures and impaired claims.

The table below shows exposures that are more than 90 days past due and impaired claims. The exposures are broken down by industry. The table also shows the breakdown between retail customers and corporate customers.

Table 10: Past due exposures and impaired claims broken down by industry (DKK 1,000).

Industries	Past due exposures (>90 days)	Impaired claims	Impairments/provisions end of year	Amounts booked as costs concerning value adjustments and impairments/provisions during the period
Public authorities	2,942	0	3,618	2,403
Agriculture, hunting, forestry and fishing	121	3,856	16,492	4,457
Industry and raw materials extraction	775	69,390	82,002	-26,207
Energy supply etc.	0	0	0	0
Building and construction	100	5,976	12,810	-11,837
Trade	3,725	28,224	26,505	3,167
Transport, hotels and restaurants	367	60,019	83,185	24,922
Information and communication	34	2,298	1,615	-108
Finance and insurance	0	1,928	2,813	421
Real estate	0	2,330	10,641	1,922
Other industries	2,432	4,621	4,607	-1,525
Total corporate	7,554	178,641	240,668	-4,788
Retail	23,075	65,781	51,599	2,147
Total	33,570	244,422	295,885	-237

The bank has chosen not to provide information on the geographical distribution of past due exposures and impaired claims, as the bank's credit exposure is almost exclusively to the Faroese market.

The table below shows the development of impairments.

Table 11: Changes in impaired claims due to value adjustments and impairment charges (DKK 1,000).

	Stage 1 impairments/ provisions		Stage 2 impairments/ provisions		Stage 3 impairments/ provisions		Impairments/ provisions due to credit institutions	
	Loans	Guaran- tees	Loans	Guaran- tees	Loans	Guaran- tees	Loans	Guaran- tees
Accumulated impairments/provisions at the beginning of the year	7,035	429	52,743	14,525	197,625	17,470	193	0
Impairments/provisions during the year	4,262	663	68,599	400	9,419	300	45	
Reversal of impairments/provisions from previous years, where there is no longer OEI or the impairment has been reduced	-4,357	-268	-10,100	-344	-47,320	-13,201	-20	
Loss (written off), previously individually impaired/provisions made					-2,214			
Total impairments/provisions on loans and guarantee debtors at year-end	6,941	824	111,242	14,581	157,511	4,569	218	0

4.2.4 Financial collateral

The bank uses the financial collateral comprehensive method as its credit risk mitigation technique for computing its capital ratio.

The bank uses neither on- nor off-balance sheet netting.

The table below shows exposure groups, where financial collateral is used for credit risk mitigation.

Table 12: Financial collateral (DKK 1,000).

Exposure group	Exposure after value adjustment	Financial collateral comprehensive method	Guarantees and credit derivatives
Governments or central banks	334,488	0	0
Local authorities	500,604	116	0
Public sector entities	546,583	0	0
Financial institutions	193,405	0	0
Retail customers	1,624,829	70,606	0
Corporate customers	2,384,843	28,375	0
Exposures secured by mortgage in real estate	2,974,388	0	0
Exposures with arrears or overdrafts	553,221	2,941	0
Exposures in other items, including assets without counterparties	191,572	0	0
Covered bonds	0	0	0
Equity Exposures	37,025	0	0
Total	9,340,959	102,038	0

4.3 Counterparty risk - derivatives

Counterparty risk is the risk of loss resulting from a financial counterparty defaulting on its obligations under a financial contract.

Betri Banki uses the mark-to-market method when calculating the size of the exposure and risk-weights for derivatives.

The exposure value, using the mark-to-market method for counterparty risk, is derived from the procedure below:

1. All contracts are computed at market value and all contracts with a positive value are included.
2. The contracts' nominal principals or the underlying values are multiplied by percentages fixed in the CRR to establish the potential future credit exposure.
3. The counterparty exposure value is calculated as the sum of positive market values and potential future credit exposures.

When Betri Banki enters into an agreement with a counterparty regarding derivatives, credit limits must be observed.

The limits to financial contracts for commitments with customers in the exposure groups, corporate and retail customers, are treated in accordance with the bank's standard credit rating principles.

No extra capital has been allocated to cover counterparty risk in the calculation of adequate own funds except for what is included in the Pillar I requirement under the 8+ model.

At the end of 2020, the positive fair value of derivatives etc. pursuant to CRR Article 273 (8) was DKK 2.2 million.

The bank's total counterparty risk calculated using the mark-to-market method pursuant to CRR Article 274 was DKK 4.5 million.

4.4 ECAI

Betri Banki has selected Standard & Poor's Ratings Services as its external credit assessment institution (ECAI). The bank uses Skandinavisk Data Center (SDC), which receives external credit ratings from Standard & Poor's Ratings Services via SIX Financial. Regular IT updates are undertaken in relation to the credit ratings from Standard & Poor's Ratings Services.

SDC has converted Standard & Poor's Ratings Services' credit rating classes to credit quality steps using the conversion table from the Danish FSA. Each individual credit quality step is given a weight to be applied to the exposures in the individual steps when calculating risk-weighted exposures according to the standard approach for credit risk pursuant to Articles 111-134 of the CRR.

The table below shows the Danish FSA's conversion of Standard & Poor's Ratings Services' credit assessment categories to credit quality steps.

Table 13: Conversion table from the Danish FSA

Credit quality step	Standard & Poor's credit rating categories	Exposure to corporates	Exposure to central governments or central banks
1	AAA to AA-	20%	0%
2	A+ to A-	50%	20%
3	BBB+ to BBB-	100%	50%
4	BB+ to BB-	100%	100%
5	B+ to B-	150%	100%
6	CCC+ and lower	150%	150%

The table below shows exposure groups where ratings from Standard & Poor's Ratings Services have been used.

Table 14: ECAI exposures (DKK 1,000).

Exposure group	Exposure before risk weighting	Exposure after weighting with credit quality steps
Governments or central banks	63,610	0
Local authorities	310,294	0
Public sector entities	414,145	380,312
Financial institutions	193,185	38,721
Retail customers	0	0
Corporate customers	0	0
Exposures secured by mortgage in real estate	0	0
Exposures with arrears or overdrafts	0	0
Exposures in other items, including assets without counterparties	0	0
Covered bonds	0	0
Equity Exposures	0	0
Total	981,235	419,033

5 Market Risk

Market risk is described below, including objective, policy and market risk exposures.

5.1 Objective and risk policy

Market risk is defined as the risk of the market value of assets and liabilities, as well as off-balance items, being affected because of changes in market conditions.

Taking on market risk is an integral part of banking. The market risk in Betri Banki is divided into interest rate risk, equity risk, foreign exchange risk and other price risks.

The Board of Directors of Betri Banki has adopted a market risk policy, which is prepared in accordance with the *Financial Business Act* and *Executive Order No. 902 of 13 July 2015 for the Faroes on the management and control of banks etc.* The policy defines the principles that apply to the bank's management of market risks, taking into account the bank's business organisation, area of operation and the framework established by the Danish FSA.

The bank uses derivatives to hedge and manage market risk, if it wants to reduce the market risk, which the bank has assumed.

The market risk policy and the limits defined in the policy are reviewed at least annually.

5.1.1 Interest rate risk

Interest rate risk is the risk of loss caused by changes in market rates.

As a rule, interest rate risk on fixed interest loans is hedged. The largest interest rate risk is in the portfolio of fixed interest rate bonds. This risk is managed within certain limits in relation to the interest rate outlook.

5.1.2 Equity risk

Equity risk is the risk of loss caused by changes in share prices. Equity risk is managed by managing and monitoring the portfolio of shares closely.

5.1.3 Foreign exchange risk

Foreign exchange risk is the risk of loss caused by fluctuating exchange rates.

Foreign exchange risk is calculated according to the Danish FSA's currency indicator 1 and currency indicator 2.

As a rule, Betri Banki hedges foreign exchange risk. The exception is foreign exchange risk between Danish kroner and Euros, which is only hedged under special circumstances.

5.1.4 Other price risks

Other price risks is the risk of loss caused by fluctuating mar-

ket prices of other assets than those mentioned above, e.g. changes in commodity prices.

At year-end 2020, Betri Banki had no risks in this category.

5.1.5 Reporting and division of responsibility

The market risk policy stipulates the division of responsibility concerning risk taking, monitoring and reporting to the Executive Board and Board of Directors.

The Board of Directors and Executive Board regularly receive reports regarding market risk and compliance with the limits defined in the policy and instructions from the Board of Directors to the Executive Board. The Finance Department is responsible for these reports.

Betri Markets has day-to-day responsibility for the bank's liquidity, securities portfolio and foreign exchange deposits, on behalf of the Executive Board. Thus, Betri Markets is also responsible for ensuring that the market risk is within the limits that are specified in the instructions from the Board of Directors to the Executive Board.

This is conducted by regularly calculating the interest rate risk on the bank's bond portfolio, a statement on the currency positions and continuous monitoring of the bank's equity portfolio. These calculations and statements are then compared to the limits for market risk that have been authorised to the Executive Board and the authorisation provided to Betri Markets in this area.

5.2 Market risk exposures

The sections below show market risk exposures as of 31.12.2020. These concern risk-weighted exposures with market risk, exposures in securities not included in the trading book, and interest rate risk not included in the trading book.

5.2.1 Risk-weighted exposures with market risk

The capital requirements for the various risks that constitute market risk are detailed in the table below.

Table 15: Risk-weighted exposures with market risk (DKK 1,000).

	Risk-weighted items	Capital requirement 8%
Bonds	527,225	42,178
Shares	120,102	9,608
Currency position	51,731	4,139
CVA	4,522	362

5.2.2 Exposures in securities not included in the trading book

Exposures in securities that are not included in the trading

book include shares relating to the bank's suppliers and securities held without trading intent.

The bank has acquired shares in a number of sector companies in partnership with other banks. The purpose of these sector companies is to support financial institutions within IT, payment services, etc. The bank does not intend to sell these shares, as participation in these sector companies is considered necessary for a bank's operations.

In several of the sector companies, the shares are redistributed to the effect that the ownership interest of the respective institution reflects its business volume with the sector company.

The shares are typically redistributed on the basis of the sector company's equity value. The bank adjusts the recognised value of these shares when new information is available that warrants a change of fair value measurement. In other sector companies, the shares are not redistributed, but are measured based on a fair value corresponding to the net asset value or another recognised valuation method.

The table below shows exposures in securities not included in the trading book.

Table 16: Exposures in securities not included in the trading book (DKK 1,000).

	Sector companies	Corporates
Portfolio beginning of period	14,355	1,932
Additions, purchases	0	0
Additions, reclassification	0	0
Unrealised gains/losses	237	0
Realised gains/losses	20	0
Disposals, sales	-874	-1,932
Portfolio end of period	13,738	0

Unrealised gains/losses are included in the income statement, and are therefore included in the tier 1 capital.

5.2.3 Interest rate risk not included in the trading book

Interest rate risk not included in the trading book is primarily derived from fixed-interest loans and deposits.

Interest rate risk or the modified duration is measured as the expected capital loss, when the interest rate curve is shifted by one percentage point.

Interest rate risk is calculated regularly. At year-end 2020, interest rate risk not included in the trading book was DKK -1.4 million.

In the bank's solvency requirement process (ICAAP) an assessment is made of whether additional funds should be allocated due to interest rate risk.

6 Liquidity Risk

Liquidity risk is described below, including objective and policy.

6.1 Objective and risk policy

Betri Banki's liquidity risk is defined as the risk that arises from differences in scheduled outgoing and incoming cash flows.

The Board of Directors of Betri Banki has adopted a liquidity risk policy, which is prepared in accordance with the *Financial Business Act* and *Executive Order No. 902 of 13 July 2015 for the Faroes on the management and control of banks etc.* The policy defines the principles that apply to the bank's management of liquidity risks, taking into account the bank's business organisation, area of operation and the framework established by the Danish FSA.

Clear requirements have been set for daily liquidity and liquidity risk statements. The bank also has a contingency plan, which lists initiatives to be taken, if liquidity falls below specific limits.

Betri Banki considers the following as liquidity risks:

- Significant increases in funding expenses
- Lack of funding preventing the bank from maintaining its approved business model
- The bank being unable to fulfil its payment obligations due to a lack of funding

The bank's liquidity policy is to maintain liquidity, which is at least 50% above the statutory minimum requirement in section 152 of the *Financial Business Act*. Betri Banki's excess liquidity coverage at the end of 2020 was 220.9% when compared to the statutory minimum requirement.

The bank must also comply with the provision that banks must have a Liquidity Coverage Ratio (LCR) in excess of 100. According to the bank's liquidity risk policy the LCR should always be at least 125. At year-end 2020, Betri Banki had a LCR of 197.4. Appendix 2 contains further specifications regarding the Liquidity Coverage Ratio.

6.1.1 Reporting and division of responsibility

The liquidity policy determines the division of responsibility regarding risk taking, control and reporting to the Executive Board and the Board of Directors.

The Board of Directors and the Executive Board receive a monthly statement on the bank's liquidity situation from the Finance Department. The statement is prepared in accordance with section 152 of the *Financial Business Act*, which stipulates that the total liquidity must be at least 10% of the bank's debt and guarantee obligations and at least 15% of the bank's total debt, which has a term to maturity less than one month. The LCR is also included in the monthly statement on the bank's liquidity. The report also contains a statement on liquidity risk. This is determined by conducting a 12-month projection of the liquidity under normal market conditions and a 12-month projection of the liquidity under stressed conditions.

Betri Markets has been given day-to-day responsibility for liquidity on behalf of the Executive Board. Betri Markets is also responsible for the daily monitoring of liquidity and liquidity projections. This is done on the basis of known future cash flows.

The Finance Department is responsible for reporting on daily and monthly liquidity; this also includes checking that the bank has sufficient liquidity.

6.2 Encumbered assets

Betri Banki has, to a certain extent, encumbered assets in connection with collateral agreements with other financial institutions.

The table below shows the specifications regarding encumbered assets.

Table 17: Encumbered assets at year-end 2020 (DKK 1,000)

Assets	Carrying amount of encumbered assets	Fair value of encumbered assets	Carrying amount of non-encumbered assets	Fair value of non-encumbered assets
	010	040	060	090
010 Assets of reporting institution	190,409		9,867,315	
030 Equity instruments	0	0	97,082	97,082
040 Debt securities	150,329	150,329	2,699,269	2,699,269
050 of which: covered bonds	150,329	150,329	2,183,662	2,183,662
060 of which: asset-backed securities	0	0	0	0
070 of which: issued by general governments	0	0	515,607	515,607
080 of which: issued by financial corporations	150,329	150,329	2,183,662	2,183,662
090 of which: issued by non-financial corporations	0	0	0	0
120 Other assets	1,818		120,541	
Collateral received				
			010	040
130 Collateral received by the reporting institution			0	0
150 Equity instruments			0	0
160 Debt securities			0	0
230 Other collateral received			0	0
240 Own debt securities issued			0	0
250 Total assets, encumbered collateral and own debt securities			190,409	0
		Matching liabilities, contingent liabilities or securities lent		Assets, collateral received and own debt securities issued
			010	030
010 Carrying amount of selected financial liabilities		3,636		188,590

7 Operational Risk

Operational risk is described below, including objective, policy and actual operational risks.

7.1 Objective and risk policy

Operational risk is defined as the risk arising from inadequate and inefficient internal processes, human errors, IT-failures and external factors, including legal risks.

The Board of Directors of Betri Banki has adopted a policy for operational risks, which is prepared in accordance with the *Financial Business Act* and *Executive Order No. 902 of 13 July 2015 for the Faroes on the management and control of banks etc.* The policy defines the principles that apply to the bank's management of operational risks, taking into account the bank's business organisation, area of operation and the framework established by the Danish FSA. The Board of Directors has also adopted an IT security policy, which defines the overall principles that apply to the banks management of IT-risks.

Betri Banki identifies the following as possible operational risks. The risk of financial loss due to:

- operational risks in the areas of credit, liquidity, securities, markets and real estate
- operational risks in relation to advising retail, corporate and public sector customers
- operational risks in staff functions and management
- manual procedures, guidelines and/or quality of these
- ineffective internal controls
- insufficient integration, stability and usability of IT-systems
- operational risks of hosted services
- inadequate insurance
- insufficient employee competences in relation to diversity of tasks
- inadequate security in premises

Increased risk may also be a result of new services, products as well as external factors.

7.1.1 Reporting and division of responsibility

The operational risk policy stipulates procedures, registration and reporting obligations.

Operational risk is managed through business procedures and internal control measures developed to ensure optimal working procedures. Operational risks are reduced by among other things separating the execution and control of activities.

The bank has procedures for recording and reporting operational events. Employees are responsible for reporting operational events to their nearest manager and Risk Management. Risk Management registers events and informs the Executive Board about the events every quarter.

7.2 Operational risk exposures

Operational risk can be limited but not eliminated. Regular processes are in place to check for risks that may have a negative impact on Betri Banki. The bank continuously focuses on developing and improving the management of risks, e.g. by strengthening and reviewing procedures and controls, ensuring documentation, controlling changes and registering, reporting and reassessing risks.

Betri Banki's IT-systems are hosted by Skandinavisk Data Center (SDC) and Elektron. A risk analysis of significant IT-systems is made annually in order to determine what business impact the risk has on Betri Banki.

The capital needed to cover Betri Banki's operational risk is calculated using the basic indicator approach. At year-end 2020, operational risk was DKK 559 million, which amounts to a capital requirement of DKK 45 million.

The bank assesses the capital requirement for operational risks on a regular basis. If the requirement is assessed to be higher than stated above, this will be taken into account in the assessment of the solvency requirement (ICAAP).

Appendix 1: Leverage ratio – disclosure template

Summary reconciliation of accounting assets and leverage ratio exposures

	Applicable amounts
1 Total assets as per published financial statement	10,057,723,379
2 Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	0
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 "CRR")	0
4 Adjustments for derivative financial instruments	7,215,588
5 Adjustments for securities financing transactions "SFTs"	
6 Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	958,825,632
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)	0
EU-6b (Adjustment for exposures excluded from the leverage ratio exposure measure in accordance with Article 429 (14) of Regulation (EU) No 575/2013)	0
7 Other adjustments	2,997,282
8 Total leverage ratio exposure	11,026,761,880

Leverage ratio common disclosure

	CRR leverage ratio exposures
On-balance sheet exposures (excluding derivatives and SFTs)	
1 On-balance sheet items (excluding derivatives, SFTs and fiduciary assets, but including collateral)	10,057,723,379
2 (Asset amounts deducted in determining Tier 1 capital)	2,997,282
3 Total on-balance sheet exposures (excluding derivatives, SFTs and fiduciary assets) (sum of lines 1 and 2)	10,060,720,660
Derivative exposures	
4 Replacement cost associated with all derivatives transactions (i.e. net of eligible cash variation margin)	0
5 Add-on amounts for PFE associated with all derivatives transactions (mark-to-market method)	7,215,588
EU-5a Exposure determined under Original Exposure Method	0
6 Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	0
7 (Deductions of receivables assets for cash variation margin provided in derivatives transactions)	0
8 (Exempted CCP leg of client-cleared trade exposures)	0
9 Adjusted effective notional amount of written credit derivatives	0
10 (Adjusted effective notional offsets and add-on deductions for written credit derivatives)	0
11 Total derivative exposures (sum of lines 4 to 10)	7,215,588

		CRR leverage ratio exposures
SFT exposures		
12	Gross SFT assets (with no recognition of netting), after adjusting for sales accounting transactions	0
13	(Netted amounts of cash payables and cash receivables of gross SFT assets)	0
14	Counterparty credit risk exposure for SFT assets	0
EU-14a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Article 429b (4) and 222 of Regulation (EU) No 575/2013	0
15	Agent transaction exposures	0
EU-15a	(Exempted CCP leg of client-cleared SFT exposure)	0
16	Total securities financing transaction exposures (sum of lines 12 to 15a)	0
Other off-balance sheet exposures		
17	Off-balance sheet exposures at gross notional amount	2,153,980,432
18	(Adjustments for conversion to credit equivalent amounts)	-1,195,154,800
19	Other off-balance sheet exposures (sum of lines 17 to 18)	958,825,632
Exempted exposures in accordance with CRR Article 429 (7) and (14) (on and off balance sheet)		
EU-19a	(Exemption of intragroup exposures (solo basis) in accordance with Article 429(7) of Regulation (EU) No 575/2013 (on and off balance sheet))	0
EU-19b	(Exposures exempted in accordance with Article 429 (14) of Regulation (EU) No 575/2013 (on and off balance sheet))	0
Capital and total exposures		
20	Tier 1 capital	1,810,238,009
21	Total leverage ratio exposures (sum of lines 3, 11, 16, 19, EU-19a and EU-19b)	11,026,761,880
Leverage ratio		
22	Leverage ratio	16.42%
Choice on transitional arrangements and amount of derecognised fiduciary items		
EU-23	Choice on transitional arrangements for the definition of the capital measure	
EU-24	Amount of derecognised fiduciary items in accordance with Article 429(11) of Regulation (EU) NO 575/2013	0

Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

	CRR leverage ratio exposures	
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	
EU-2	Trading book exposures	2,912,404,929
EU-3	Banking book exposures, of which:	
EU-4	Covered bonds	0
EU-5	Exposures treated as sovereigns	394,959,450
EU-6	Exposures to regional governments, MDB, international organisations and PSE NOT treated as sovereigns	678,104,619
EU-7	Institutions	169,489,523
EU-8	Secured by mortgages of immovable properties	2,511,833,078
EU-9	Retail exposures	1,094,667,471
EU-10	Corporate	1,559,259,384
EU-11	Exposures in default	505,433,093
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	228,597,398

Appendix 2: Liquidity coverage ratio – disclosure template

Currency and units – DKK 1,000 Quarter ending on		Total unweighted value				Total weighted value			
		31 Mar 20	30 Jun 20	30 Sep 20	31 Dec 20	31 Mar 20	30 Jun 20	30 Sep 20	31 Dec 20
High-quality liquid assets									
1	Total HQLA					2,638,092	2,729,746	2,820,316	2,880,121
Cash outflows									
2	Retail deposits and deposits from small business customers, of which:	3,973,162	5,668,257	5,760,963	5,826,234	303,551	553,625	572,597	522,965
3	Stable deposits	2,856,087	912,223	938,066	1,499,748	142,804	45,611	46,903	74,987
4	Less stable deposits	1,117,075	4,756,034	4,822,897	4,326,487	160,747	508,014	525,693	447,977
5	Unsecured wholesale funding, of which:	2,066,487	1,923,285	1,883,887	2,041,031	1,088,811	918,939	970,359	994,036
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks								
7	Non-operational deposits (all counterparties)	2,066,487	1,923,285	1,883,887	2,041,031	1,088,811	918,939	970,359	994,036
8	Unsecured debt								
9	Secured wholesale funding								
10	Additional requirements, of which:	1,099,154	1,204,497	1,464,719	1,220,442	126,015	131,418	160,019	117,902
11	Outflows related to derivative exposures and other collateral requirements	1,427	705	1,657	1,406	1,427	705	1,657	1,406
12	Outflows related to loss of funding of debt products								
13	Credit and liquidity facilities	1,097,727	1,203,793	1,463,062	1,219,036	124,588	130,714	158,362	116,496
14	Other contractual funding obligations	49,055	1,290	369	2,333	49,055	1,290	369	2,333
15	Other contingent funding obligations								
16	TOTAL CASH OUTFLOWS					1,567,432	1,605,273	1,703,343	1,637,236
Cash inflows									
17	Secured lending (e.g. reverse repo)								
18	Inflows from fully performing exposures	193,079	178,716	153,075	204,591	169,761	172,775	149,711	175,021
19	Other cash inflows	14,710	2,665	3,149	5,228	10,907	1,630	2,148	3,393
19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)								
19b	(Excess inflows from a related specialised credit institution)								
20	TOTAL CASH INFLOWS	207,788	181,380	156,224	209,819	180,669	174,404	151,859	178,414
20a	Fully exempt inflows								
20b	Inflows Subject to 90% Cap								
20c	Inflows Subject to 75% Cap	207,788	181,380	156,224	209,819	180,669	174,404	151,859	178,414
						Total adjusted value			
21	Total HQLA					2,638,092	2,729,746	2,820,316	2,880,121
22	Total net cash outflows					1,386,763	1,430,869	1,551,484	1,458,823
23	Liquidity coverage ratio (%)					190.23	190.78	181.78	197.43



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