

Risk Management Report 2020

Board of Directors
and Executive Board

Group objectives of Risk Management Report

To keep our shareholders and other stakeholders informed of the group's risk and capital management policies, including risk management methodologies and practices, both short and long term

BANKNORDIK

Contents

1.	Introduction	4
2.	Organisation	5
2.1	Introduction	5
2.2	Risk policies and limits	6
2.3	Risk organization	7
2.3.1	Board of Directors	8
2.3.2	Executive Board	8
2.3.3	Risk Committee	9
2.3.4	Credit Committee	9
2.3.5	Staff departments	9
2.3.6	Business units	10
2.4	Reporting	11
3.	Capital Management	12
3.1	Framework of the Group's capital management	12
3.2	Pillar I	12
3.3	Pillar II	12
3.3.1	Solvency requirement	14
3.3.2	The methodology	14
3.3.3	Group solvency requirement	15
4.	Credit Risk	16
4.1	Definition	16
4.2	Policy	16
4.3	Credit process	16
4.4	Credit risk classification	17
4.5	Credit exposure	18
4.5.1	Credit exposure, quality and concentration	19
4.6	Risk mitigation	21
4.7	Monitoring and portfolio management	24
4.7.1	Credit risk management	24
4.8	Impairment/Losses	25
4.9	The Supervisory Diamond	27

5.	Market Risk	28
5.1	Organisation	28
5.2	Definition	28
5.3	Policy and responsibility	28
5.4	Control and management	29
5.5	Market risk	29
5.6	Interest rate risk	29
5.7	Exchange rate risk	30
5.8	Equity market risk	30
6.	Liquidity Risk	31
6.1	Definition	31
6.2	Control and management	31
6.2.1	Operational liquidity risk	31
6.2.2	Liquidity stress testing	31
6.2.3	Twelvemonth liquidity	31
6.2.4	Structural liquidity risk	32
6.2.5	Funding sources	32
6.3	Collateral provided by the Group	32
7.	Operational Risk	34
7.1	Definition	34
7.2	Policy	34
7.3	Measurement and control	34
7.4	Long-term goals in operational risk management	35
8.	Insurance Risk	36
8.1	Insurance risk	36
8.2	Capital requirements	37
8.3	Trygd non-life insurance	37
8.4	NordikLív – Life insurance	39

1. Introduction

The purpose of BankNordik's Risk Management Report is to ensure transparency in the BankNordik Group and to make available information on how the Group manages the risks it encounters.

BankNordik's Risk Management Report is published annually on the Group's website, www.banknordik.com/rmr, simultaneously with the release of the Group's Annual Report 2020. The Risk Management Report is a separate unaudited document. There are no audit requirements for the Risk Management Report, but much of the information in the Risk Management Report will also be provided in the audited Annual Report 2020.

A note on the sale of BankNordik's Danish operations

On 22 December 2020, BankNordik entered into a conditional agreement with Spar Nord on the sale of its Danish operations at the carrying amount and the addition of goodwill of DKK 255m. The agreement was subject to regulatory approval, which was given on 25 January 2021, allowing the final completion of the sale to take place on 1 February.

Spar Nord acquired an efficient and profitable business with dedicated and competent employees to which the satisfactory sale price attests. Despite the fact that it had become untenable to maintain the competitiveness of a relatively small Danish banking operation while being designated a SIFI in the Faroe Islands, BankNordik is heartened by the fact that its hard work building its Danish business has not gone unrecognised.

Continuing and discontinued operations

Although the sale was completed after the end of the 2020 financial year, the sale affects the presentation in this Risk Management Report. The effects are as follows:

- Credit risk figures for 2020 are restated for the Group's continuing operations unless otherwise stated. Historical figures, however, have not been restated and represent the Group's combined continuing and discontinued operations, which means that historical credit risk figures are not directly comparable to the 2020 figures.
- Figures and tables in all other chapters are not restated and as such relate to the Group's combined continuing and discontinued operations

2. Organisation

2.1 Introduction

Understanding and ensuring transparency in risk taking are key elements of the BankNordik Group's business strategy. The Group's ambition is to set high standards for risk management. Our risk organization supports this ambition, and it has developed in-depth risk management expertise.

The Board of Directors sets out the overall risk policies for all types of material risk while the Chief Executive Officer (CEO) is responsible for the day-to-day management of the Group, including implementation of the risk policies and risk management.

The Executive Board consists of Group CEO, Árni Ellefsen. At the chief operational level, the Group is divided into three main business units:

- Corporate Banking operations In the Faroe Islands, Denmark and Greenland, headed by Árni Ellefsen, CEO
- Personal Banking operations and products support in the Faroe Islands, Denmark and Greenland, headed by Turið F. Arge, Chief Operating Officer

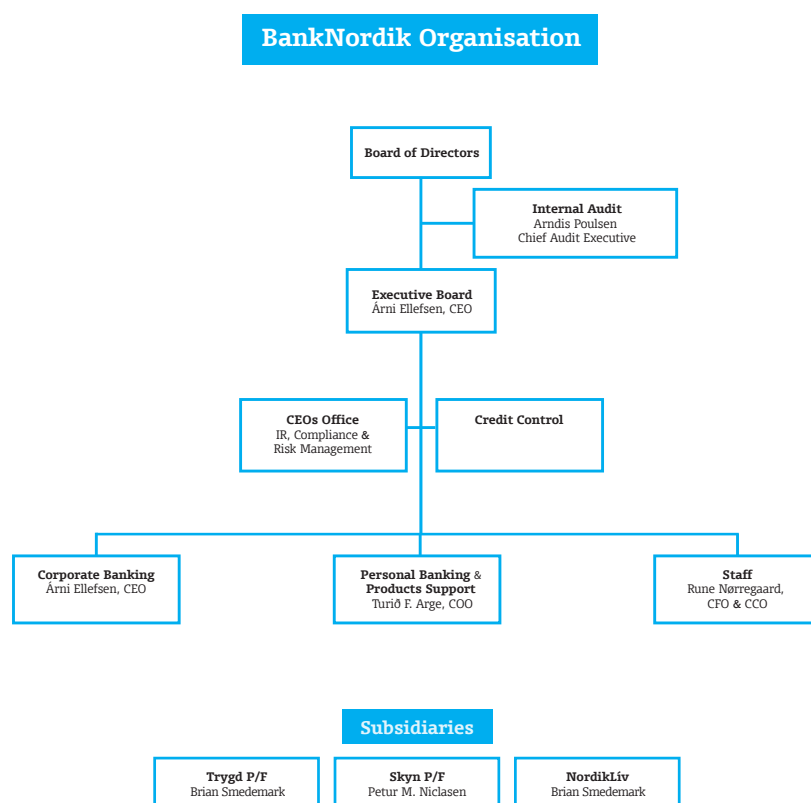


figure 1

The Executive Secretariat, HR, insurance activities (Trygd P/F and NordikLív P/F) and the Real Estate Company (Skyn P/F) reports to Árni Ellefsen, Chief Executive Officer.

The business units are supported by the following units:

- Credit Services, Finance, Accounting, Treasury and IT, headed by Rune Nørregaard, Chief Credit Officer
- Marketing, headed by Turið F. Arge, Chief Operating Officer

The Group's risk officer and compliance officer are members of CEO's office.

The Chief Executive Officer, Chief Operating Officer and Chief Credit Officer constitute the Group Executive Management Team.

The Board of Directors and the Group Executive Management Team have established various sub-committees, including an Audit Committee, a Credit Committee and a Risk Committee.

The Group allocates resources to manage and monitor risk and to ensure on-going compliance with approved risk limits. The Group has a reporting cycle to ensure that the relevant management bodies, including the Board of Directors, the Chief Executive Officer and the Group Executive Management Team, are kept informed of relevant developments in risk measures.

The Group's risk policies as well as its limits and organizational framework for risk management are described in greater detail in the following sections.

2.2 Risk policies and limits

The Board of Directors sets out the overall risk policies and limits for all material risk types. The Board also determines the general principles for managing and monitoring risk, and it reviews the risk policies and limits annually. The Group uses risk appetite as a strategic concept to determine its risk-based limits. Risk appetite represents the maximum risk the Group is willing to assume in pursuit of its business targets. The risk appetite framework offers an overview of various risk dimensions and enables the Group to manage risk measurement across these dimensions in accordance with its overall risk policies.

The framework is based on an analysis of the current risk profiles of the Group and its major business units. It includes setting explicit targets, limits and contingency plans in accordance with the risk policies. It also includes monitoring of risk levels.

Key risk elements are identified on an on-going basis in a dynamic process driven by new products, procedures, risk measurement applications as well as economic developments. The Group conducts risk management at the customer and industry levels as well as on the basis of geographical location and collateral type. It takes a comprehensive approach to the core risk dimensions:

- Credit risk
- Market risk
- Liquidity risk
- Operational risk

Other risk dimensions are incorporated at the Group and business unit levels where appropriate. They include insurance and concentration risk, financial strength, and earnings robustness. Specific risk instructions for the main business units are prepared on the basis of the overall risk policies and limits. These instructions are used to prepare business procedures and reconciliation and control procedures for the relevant units and for system development purposes.

2.3 Risk organization

BankNordik's "Rules of procedure" for the Board of Directors and the "Board of Directors' Instructions to the Executive Board" specifies the responsibilities of the Board of Directors and the Executive Board and the division of responsibilities between them. This two-tier management structure has been developed in accordance with Faroese and Danish legislation, and the "Rules of procedure" and "Board of Directors' Instructions to the Executive Board" are key documents in the Group's management structure, including the organization of risk management and authorizations.

The Board of Directors lays down overall policies, while the Executive Board is in charge of the Group's day-to-day management and reports to the Board of Directors. None of the Group's executive managers serve on the Board of Directors of the parent company. The risk and capital management functions are separate from the credit assessment and credit-granting functions, as shown in figure 2.

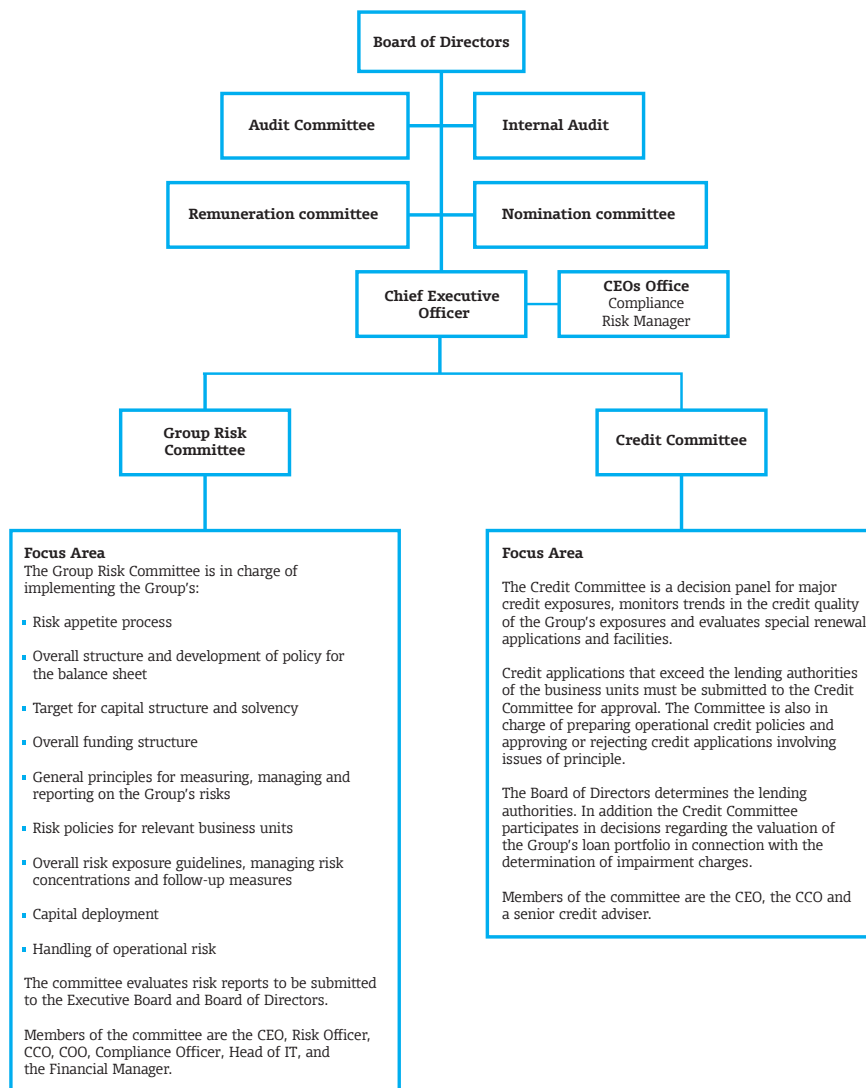


figure 2

The Group's management structure also reflects the statutory requirements governing listed Faroese companies in general and financial services institutions in particular. The BankNordik Group applies to comply or explain principle set out in the recommendations issued by the Committee of Corporate Governance. These recommendations apply to companies listed on NASDAQ Copenhagen.

The Board of Directors has established an Audit Committee. The Audit Committee examines accounting, auditing and security issues that the Board of Directors, the Audit Committee, the internal auditor or the external auditors believe deserve attention. The committee also reviews the internal control and risk management system.

The Audit Committee consists of Ben Arabo, Chairman of the Board, Gunnar Nielsen, member of the board, Hans Arni Bjarnason Thomsen, member of the board and Jógvan Jespersen, member of the board.

The Executive Board has assembled the Group Executive Management Team and established the two risk-orientated sub-committees, the Risk Committee and the Credit Committee.

2.3.1 Board of Directors

The Board of Directors must ensure that the Group is appropriately organized. As part of this duty, it appoints the members of the Executive Board and the Group's Chief Internal Auditor.

The largest credit facilities are submitted to the Board of Directors for approval, and the Board defines overall limits for market risk and liquidity risk. Regular reporting enables the Board of Directors to monitor whether the overall risk policies and systems are being complied with and whether they meet the Group's needs. In addition, the Board of Directors reviews reports analyzing the Group's portfolio, particularly information about industry concentrations, large exposures and impaired exposures.

Internal Audit examines accounting, auditing and security issues. These are issues that the Board of Directors or the external auditors believe deserve day-to-day attention. Internal Audit also reviews the internal control and risk management systems.

2.3.2 Executive Board

The Executive Board is responsible for the day-to-day management of the Group as stated in the "Rules of procedure" for the Board of Directors and the "Board of Directors' Instructions to the Executive Board".

The Executive Board sets forth specific risk instructions and supervises the Group's risk management practices. It reports to the Board of Directors on the Group's risk exposures and approves material business transactions, including credit applications up to a defined limit.

The Executive Board has assembled the Group Executive Management Team and established two committees to be in charge of day-to-day risk management, the Risk Committee and the Credit Committee.

The Group has also organized various sub-committees/functions for specific risk management areas such as asset and liability management and the management of risk parameters and models affecting the Group's capital and risk-weighted assets. The sub-committees consist mostly of members of the management team.

2.3.3 Risk Committee

The Risk Committee consists of:

- The Chief Executive Officer
- The Chief Operating Officer
- The Chief Credit Officer
- The Compliance Officer
- The Risk Officer
- The Financial Manager
- The Head of IT
- The head of Insurance activities

The Risk Committee is in charge of identifying all main risks of the Group with the aim of optimizing the Group's revenue compared to risk, e.g. by setting out guidelines for implementing and changing internal procedures for measuring and controlling risk, modelling principles etc.

The Risk Committee processes all risk-related matters, including:

- The Capital Requirements Directive and related legislation
- Internal procedures for measuring and controlling risk
- The capital structure and targets for and levels of solvency and liquidity
- Allocation of risk capital to units and risk types, e.g. as part of the solvency requirement
- Material changes in model principles for risk management and yearly evaluations of such principles and models

In addition, the Committee evaluates the risk report to be submitted to the Board of Directors. The Committee also assists the Executive Board in its functions and processes related to operational risk management.

2.3.4 Credit Committee

The Credit Committee consists of the CEO, the CCO and a Senior Credit Adviser.

Credit applications that exceed the lending authorities of the Credit Department (personal and corporate customers) must be submitted to the Credit Committee for approval along with a credit recommendation.

The Committee is in charge of preparing operational credit policies and approving or rejecting credit applications involving issues of principle.

The Board of Directors determines the lending authorities. In addition, the Credit Committee participates in decisions regarding the valuation of the Group's loan portfolio in connection with the determination of impairment charges.

2.3.5 Staff departments

The Group's overall risk issues including credit, market, liquidity and operational risks are monitored by the Group Risk Committee, in co-operation with managers of business units and subsidiaries, reporting directly to the Executive Board.

The Finance department oversees the Group's financial reporting, budgeting, liquidity and capital structure. It also has overall responsibility for the Group's compliance with the Capital Requirements Directive and related legislation and for the internal capital adequacy assessment process.

The Group has established a functional separation between units that enter into business transactions with customers or otherwise expose the Group to risk on the one hand and units in charge of overall risk management on the other.

The Group's Risk Management is carried out by the Group's Risk Officer which is a part of the Executive Board Secretariat with reporting rights and obligations to the Executive Board and reporting rights to the Board of Directors in risk-related matters. Risk Management has overall responsibility for monitoring the Group's risk portfolio and reporting on overall risk measures. In addition, Risk Management is responsible for the implementation of risk models and risk analysis and for providing support to the Risk Committee.

The Credit Department has the overall responsibility for the credit process in all of the Group's business units. This includes responsibility for developing credit classification and valuation models and for seeing that they are used by the local units in their day-to-day credit processing. The Credit Department is in charge of determining the utilization of portfolio limits for industries and countries and of the quarterly process of calculating the impairment of exposures. It also keeps track of the credit quality of the Group's loan portfolio by monitoring trends in unauthorized overdrafts and overdue payments, new approvals to weak customers and other factors. In addition, the Credit Department reports to the Group management and to business units on developments in the Group's credit risk. Finally, the department is in charge of providing management information about credits, of monitoring credit approvals in the business units, and of determining the Group's requirements relating to its credit systems and processes.

The CEO's office is in charge of analyzing and monitoring strategic business risk and corporate governance.

2.3.6 Business units

Core risk dimensions such as market risk and liquidity risk are managed centrally. For credit risk, however, lending authority for specific customer segments and products has been delegated to the individual business units. The business units carry out the fundamental tasks required for optimal risk management. This includes updating the necessary registrations about customers that are used in risk management tools and models, as well as maintaining and following up on customer relationships.

Each business unit is responsible for preparing carefully drafted documentation before business transactions are undertaken and for properly recording the transactions. Each business unit is also required to update information on customer relations and other issues as may be necessary.

The business units must ensure that all risk exposures comply with specific risk instructions as well as the Group's other guidelines. Loan and credit approvals to retail customers and small business customers are given according to the lending authorities delegated to the individual branches.

Customer advisers are responsible for the basic credit assessment of customers. Their lending authority depends on customer classification, and they can approve credits up to certain amounts. Advisers must forward applications for credit facilities beyond their lending authority to the branch management, which may decide to submit applications to the Credit Department.

2.4 Reporting

The Group has a reporting cycle to ensure that the relevant management bodies, including the Board of Directors, the Executive Board and the Group Executive Management Team, are kept informed of, among other things, developments in risk measures, the credit portfolio, non-performing loans, market risk, strategic and operational risk.

The Board of Directors receives the principal risk reports (see Table 1) and the principle solvency requirement in the form of the Group's annual solvency handbook. As part of the quarterly evaluation of the Group's solvency requirement, the Board of Directors receives up-to-date information on any material changes in the Group's risk profile. On a monthly basis the Board of Directors receives a report on the Group's market and liquidity risk.

Table 1

Risk appetite	Strategic determination of risk-based limits, representing the maximum risk that the Group is willing to assume in pursuit of business targets and in accordance with its overall risk policies.
Risk policy	Review of the Group's overall risk policy to determine whether revisions are required.
Models and parameters	Update on the use of risk models and risk parameters.
Quality of credit portfolio	Analysis of impairment charges and losses by business unit and portfolio break-downs by category, size, business unit, etc.

Table 2

BankNordik Group Methodology	Evaluation of the preferred risk and the level of capital according to the FSA's 8+ approach.
Key figures for the credit portfolio	An overview of credit-quality indicators, classifications and trends in lending volumes.
Market risk	Analysis of the Group's current equity, fixed income and currency positions and report on the utilisation of Board approved limits since the preceding report.
Large exposures	An overview of exposures equal to or exceeding 10% of the Group total capital and the sum of these exposures, including the percentage of the Group's total capital it represents.

Table 3

Liquidity risk	Analysing and stress tests of the Group's current liquidity
Market risk	Analysis of the Group's current equity, fixed income and currency positions and report on the utilisation of Board approved limits since the preceding report.

3. Capital Management

BankNordik is well capitalised with a high solvency ratio and excess cover relative to the statutory requirements. The Board of Directors is focused on maintaining the capital base necessary to fulfil its strategic goals and sustain the Bank's continued business development. Constant monitoring and valuation of the Group solvency ratio forms an integral part of the Group's capital management.

3.1 Framework of the Group's capital management

The basis of the BankNordik Group's capital management is the CRD IV requirements and the Internal Capital Adequacy Assessment Process (ICAAP), which consists of three pillars.

- Pillar I contains a set of rules for a mathematical calculation of the Total capital and the risk weighted assets (RWA).
- Pillar II describes the supervisory review and evaluation process and contains the framework for the internal capital adequacy assessment process.
- Pillar III deals with market discipline and sets forth disclosure requirements for risk and capital management

3.2 Pillar I

In accordance with the CRD IV requirements stipulated in the regulation (EU) No 575/2013 of the European parliament and of the Council of 26 June 2013, total RWA is calculated as the sum of RWA for credit, market and operational risk. Total capital is calculated as the sum of common equity tier 1 (CET1) and additional tier 1 and tier 2 instruments.

Table 4 sets out the Bank's Solvency statement as of 31 December 2020, including the basis for calculating risk-weighted items, CET 1 capital, Core capital and Total capital.

3.3 Pillar II

While Pillar I contains uniform rules for capturing a financial institution's risk and calculating the capital requirements in accordance with the CRD IV requirements, it does not necessarily capture all risk affect-ing individual institutions. Pillar II contains a framework for an Own Risk Solvency Assessment process based on the situation and characteristics of the individual institution. The underlying aim of the Pillar II process is to enhance the link between an institution's risk profile, its risk management systems and its capi-tal. Institutions are expected to develop sound risk management processes that properly identify, measure, aggregate and monitor their risk.

Pillar II is underpinned by four principles:

- Assessment of capital adequacy in relation to the institution's risk profile and capital strategy
- Review and evaluation of the assessment and its ability to monitor and ensure compliance with its own requirement.
- The expectation that the institution will operate above the Minimum Capital Requirement (MCR) and the ability of the Danish FSA to require a financial institution to maintain a capital buffer relative to the MCR.
- FSA intervention at an early stage to prevent capital from falling below the minimum level required to support the risk profile or to require rapid remedial action if capital is not maintained or restored.

Capital and Solvency - BankNordik (incl. discontinued operations)			Table 4
DKK 1,000	Dec. 31 2020	Dec. 31 2019	
Core capital	2.356.719	2.173.404	
Total capital	2.581.414	2.397.490	
Risk-weighted items not included in the trading portfolio	8.120.941	8.374.072	
Risk-weighted items with market risk etc.	584.300	1.299.559	
Risk-weighted items with operational risk	1.068.984	1.090.091	
Total risk-weighted items	9.774.225	10.763.722	
CET 1 capital ratio	22,6%	18,8%	
Core capital ratio	24,1%	20,2%	
Total capital ratio	26,4%	22,3%	
Core Capital and Shareholders' equity			
Share capital	192.000	192.000	
Reserves	9.243	8.628	
Net profit	166.186	206.631	
Retained earnings, previous years	1.908.332	1.712.623	
Shareholders' equity, before deduction of holdings of own shares	2.275.762	2.119.882	
Deduction of dividend	48.000	68.939	
Deduction of holdings of own shares	4.738	7.547	
Deduction of intangible assets	12.572	9.957	
Deduction of deferred tax assets	0	4.960	
Deduction regarding prudent valuation of financial instruments	4.642	5.828	
CET 1 capital	2.205.809	2.022.650	
Hybrid core capital	150.909	150.754	
Core capital	2.356.719	2.173.404	
Total capital			
Core capital	2.356.719	2.173.404	
Subordinated loan capital	224.695	224.086	
Total capital	2.581.414	2.397.490	
<p>The BankNordik Group holds a license to operate as a bank and is therefore subject to a capital requirement under the Faroese Financial Business Act and to CRR. The Faroese provisions on capital requirements apply to both the Parent Company and the Group. The capital requirement provisions stipulate a minimum capital of 8% of the identified risks. A detailed body of rules determines the calculation of capital as well as risks (risk-weighted items). The capital comprises CET 1 capital, hybrid core capital and subordinated loan capital. The CET 1 capital corresponds to the carrying amount of equity, after deductions of holdings of own shares, tax assets and other minor deductions.</p>			

In order to measure and identify all risk exposure to the Group, the Group applies a Danish FSA approved capital adequacy assessment process.

The method is based on an 8+ approach. An 8+ approach means that a review takes, as its baseline, the minimum requirement of 8 per cent of the risk-weighted items (pillar 1) plus a margin for risks and matters that are not fully reflected in the statement of risk-weighted items. In other words, ordinary risks are assumed to be covered by the 8 per cent requirement, and the question to consider is whether a bank is exposed to other risks that necessitate an increase in the solvency requirement (pillar II).

3.3.1 Solvency requirement

The Group's Executive Board and Board of Directors are responsible for maintaining a sufficient capital base and lay down requirements for individual solvency. The Group's Risk Committee is responsible for monitoring and making sure on an ongoing basis that the solvency requirements (methodological) determined by the Executive Board and the Board of Directors are complied with at all times. The overall responsibility for reporting to the Executive Board and the Board of Directors regarding solvency requirements lies with the Finance Department.

3.3.2 The methodology

The Group has implemented a methodology approved by the Danish FSA to ensure that BankNordik can expose/identify any potential risk and meet the requirements set by the Executive Board and the Board of Directors. The methodology forms an integral part of the Group's organization and the Finance Department prepares a quarterly report. The report is then submitted to the Executive Board. The Board of Directors receives a condensed quarterly report and a full annual solvency requirement report that is submitted to the Board for approval.

The method can be split into two main parts. The first part involves the calculation of the minimal capital requirement (please refer to the 8+ approach). The second part consists of eight underlying risk factors:

- Earnings
- Growth in lending
- Credit risk
- Market risk
- Liquidity risk
- Operational risk
- Leverage risk
- Statutory requirements

In addition to these eight risk factors, the Bank calculates potential premiums for special risks believed not to be covered by the calculation of minimal risk. See the calculation of the 8+ capital requirement below in table 5.

Capital and solvency adequacy assessment (incl. discontinued operations)	31.12.2020		31.12.2019	
	Capital requirement, 1,000 DKK	RWA Capital requirement, per cent	Capital requirement, 1,000 DKK	RWA Capital requirement, per cent
DKK 1,000				
1) Basic Capital requirement, 8 % of RWA	781.938	8,0%	853.104	8,0%
+ 2) Earnings (capital for risk coverage due to weak earnings)	-	0,0%	-	0,2%
+ 3) Growth in lending (capital to cover organic growth in business volume)	-	0,0%	-	0,0%
+ 4) Credit risk, of which:	67.415	0,7%	75.892	0,7%
4a) Credit risk on major customers in financial distress	21.766	0,2%	31.844	0,3%
4b) Other credit risk	14.985	0,2%	15.727	0,1%
4c) Concentration risk on individual exposures	30.663	0,3%	28.321	0,3%
4d) Concentration risk on industries	-	0,0%	-	0,0%
+ 5) Market risk, of which:	40.800	0,4%	74.219	0,7%
5a) Interest risk	15.800	0,2%	21.429	0,2%
5b) Credit spread risk	25.000	0,3%	52.790	0,5%
5c) Equity risk	-	0,0%	-	0,0%
5d) Foreign exchange risk	-	0,0%	-	0,0%
+ 6) Liquidity risk (capital to cover more expensive liquidity)	-	0,0%	-	0,0%
+ 7) Operational risk (capital to cover operational risk in excess of pillar I)	68.420	0,7%	-	0,0%
+ 8) Gearing (capital to cover risk due to gearing)	-	0,0%	-	0,0%
+ 9) Margins due to statutory requirements	-	0,0%	-	0,0%
Capital requirement and solvency requirement ratio	958.573	9,8%	1.003.215	9,4%

If any other areas of special risk are identified that are not listed in the model set out above, the Bank calculates an extra capital requirement for such risk. In addition to stress testing different risk parameters, the second part of the model involves additional capital requirements for specific additional individual risk exposures, where every potential material risk specific to BankNordik is taken into account and any potential risk is included in order to determine a possible additional capital requirement. The summary of the minimal 8+ capital requirement and any possible individual additional capital requirement constitute BankNordik's total individual capital requirement.

3.3.3 Group solvency requirement (incl. discontinued operations)

The Group's solvency requirement has been calculated using the method illustrated above. At the end of December 2020, the solvency requirement was 9.8%, the risk-weighted items were DKK 9.8bn and the capital requirement was DKK 959m.

Excess capital according to adequacy requirements (incl. discontinued operations)

Table 6

DKK 1,000	2020	2019	Change
Total risk-weighted items	9.774.225	10.763.722	-989.496
Total capital	2.581.414	2.397.490	183.924
Core capital	2.356.719	2.173.404	183.315
CET 1 capital	2.205.809	2.022.650	183.159
Total capital ratio	26,4%	22,3%	4,1%
Core capital ratio	24,1%	20,2%	3,9%
CET 1 capital ratio	22,6%	18,8%	3,8%
Capital requirement	958.573	1.006.519	-47.946
Solvency requirement	9,8%	9,4%	0,5%
Excess Subordinated and Hybrid loan capital (> 2% / > 1,5% of RWA), DKK	-27.804	-8.812	-18.992
Excess Subordinated and Hybrid loan capital (> 2% / > 1,5% of RWA), %	-0,3%	-0,1%	-0,2%
Excess capital, DKK 1,000	1.595.038	1.382.160	212.878
Excess capital ratio	16,3%	12,8%	3,5%

4 Credit Risk

Credit risk is the most crucial risk facing the Group. BankNordik has loans and advances (exposures) of DKK 11,918m, the vast majority of which has been provided to customers in the Faroe Islands, Denmark and Greenland. The Group pursues an overall credit policy calling for a balanced distribution of loans and advances, however, with an overweight of exposures towards private customers.

Set out below is a presentation of the Group's credit policy, credit risk classification process, credit exposure and credit management. The Group's procedures for writing off bad and doubtful debts form an integral part of this presentation.

In connection with the acquisition of Sparbank (2010) and Amagerbanken (2011), the Group took over some of the exposures that were individually impaired and some of these exposures are a part of the continued operation. These impairments are recognised as part of the purchase price for the acquired exposures. In 2020 DKK 57,4m of the impairments reflected in the table below are individual impairments recognised up to 12 months after the acquisition of the relevant exposure.

4.1 Definition

The Group defines credit risk as the risk of losses arising because counterparties fail to meet all or part of their payment obligations to the Group. Credit risk also includes country, settlement and counterparty credit risks, among other things.

BankNordik manages its overall credit risk by way of its general credit policy. One of the purposes of the credit policy is to ensure a balanced relationship between earnings and risk taking.

4.2 Policy

The Board of Directors sets the overall policies for the Group's credit risk exposure. The Group's risk appetite framework is determined in accordance with these policies. The key components of the credit risk policies are described below.

The Group's aim is to build long-term relationships with its customers. For the vast majority of products, credit is granted on the basis of the customer's financial circumstances and specific individual assessments. Ongoing follow-up on developments in the customer's financial situation enables the Group to assess whether the basis for the credit facility has changed. The credit facilities should match the customer's creditworthiness, capital position and assets. Further and in order to increase the mitigation of credit risk, the Group as a general rule requires collateral.

The Group aims to assume risks only within the limits of applicable legislation and other rules, including rules on best practices for financial undertakings.

4.3 Credit process

In order to ensure a consistent, coordinated credit granting process of a high quality all credit applications are handled according to a pre-defined procedure that provides a consistent, high credit processing quality:

Bank branches: All branch managers can process and approve credit applications within branch manager credit lines. Credit applications exceeding branch manager's credit lines are submitted to the Credit Department along with a credit recommendation.

Corporate Department: The central corporate departments in the Faroe Islands and Greenland handle all of the Group's major corporate accounts, and the winding up of the Danish corporate credits are handled by specialists within the Credit Department. Credit applications exceeding the Corporate Department's credit lines are submitted to the Credit Department for approval.

The Credit Department: Applications that exceed a branch / Corporate Department credit line are submitted to the Credit

Department for approval. The Credit Department also processes staff loan applications exceeding the limit of the branch credit lines. In addition to processing credit applications, the Credit Department coordinates and prepares credit recommendations to the Group's Credit Committee and recommendations submitted to the Board of Directors.

The Credit Committee: The Credit Committee reviews all applications beyond the Credit Department's credit line. The Credit Committee conducts credit meetings on a weekly basis. The purpose of the Credit Committee is to:

- Process credit applications exceeding the credit line of the Credit Department;
- Process and provide recommendations for all credit applications to be submitted to the Group's Board of Directors;
- Implement the guidelines for the credit area as approved by the Board of Directors; and
- To supervise the overall credit granting procedure.

Board of Directors: The Board of Directors reviews all applications that are beyond the Credit Committee's credit line.

Credit processing must be conducted on the basis of extensive knowledge of the risks inherent to each individual exposure for the purpose of striking a balance between risk and earnings opportunities and in compliance with the overall goals defined by the Board of Directors.

4.4 Credit risk classification

BankNordik's lending exposure is subject to very careful management as part of the day-to-day follow-up conducted by the branches or departments with day-to-day responsibility for the individual portfolios. The follow-up and management process is split into the following categories:

- Day-to-day management is conducted by the relevant account manager;
- Commitments meeting specific criteria are tested individually for impairment four times per year in connection with the Group's quarterly financial statements;
- Reports on exposures due for review by the Credit Department in cooperation with the relevant branch or department; The largest exposures are reviewed annually with the Credit Committee;
- Constant monitoring of the largest exposures is a key priority.

The Group apply an automatic rating model and methodology that provides all customers, private and corporate, with a probability of default for the coming 12 months. This probability of default is mainly used in the Groups' IFRS 9 impairment model, but is to some extent also a part of the daily credit monitoring process. The Group still classifies its customers in accordance with the methodology used by the Danish FSA, see table 7. Currently, more than 99% of the overall exposure is individually classified, see table 7 for more details.

4.5 Credit exposure

The following section provides a presentation and review of the Group's loan portfolio. The review deals with the overall loan portfolio, followed by a report on the individual sub-portfolios. The figures include individual and collective impairments, which are itemized in part 4.8.

The Group's total loan exposures portfolio listed by category is set out in table 7. As shown in table 10, the Group's credit facilities are largely equally distributed between the private and the corporate / public segments. Funds placed with credit institutions and central banks are money market placements and not committed lines.

In the annual report 2020, figures for loans and guarantees are adjusted in accordance with the applicable accounting terms and are therefore not directly comparable to the exposure listed in this Risk Management Report.

Quality of loan portfolio excl. financial institutions 2020					Table 7
Continuing operations		> 7.5m	< 7.5m	Total	
Portfolio without weakness (3, 2a)	Exposure in DKKm	4.139	1.365	5.504	
Portfolio with some weakness (2b)	Exposure in DKKm	1.752	3.737	5.488	
Portfolio with significant weakness (2c)	Exposure in DKKm	206	117	324	
	Unsecured	39	22	61	
Portfolio with OEI	Exposure in DKKm	211	286	496	
	Unsecured	109	128	236	
	Impairments/provisions	91	123	214	
Portfolio without individual classification	Exposure in DKKm	55	51	106	
Total	Exposure in DKKm	6.363	5.556	11.918	
Quality of loan portfolio excl. financial institutions 2020					
Discontinued operations		> 7.5m	< 7.5m	Total	
Portfolio without weakness (3, 2a)	Exposure in DKKm	33	1.777	1.810	
Portfolio with some weakness (2b)	Exposure in DKKm	45	2.519	2.564	
Portfolio with significant weakness (2c)	Exposure in DKKm	0	74	74	
	Unsecured	0	24	24	
Portfolio with OEI	Exposure in DKKm	0	202	202	
	Unsecured	0	109	109	
	Impairments/provisions	0	105	105	
Portfolio without individual classification	Exposure in DKKm	0	45	45	
Total	Exposure in DKKm	78	4.618	4.696	
Quality of loan portfolio excl. financial institutions 2019, total					
		> 7.5m	< 7.5m	Total	
Portfolio without weakness (3, 2a)	Exposure in DKKm	3.519	3.302	6.821	
Portfolio with some weakness (2b)	Exposure in DKKm	1.812	6.257	8.069	
Portfolio with significant weakness (2c)	Exposure in DKKm	209	242	451	
	Unsecured	49	56	105	
Portfolio with OEI	Exposure in DKKm	160	557	717	
	Unsecured	102	317	419	
	Impairments/provisions	99	303	399	
Portfolio without individual classification	Exposure in DKKm	127	88	215	
Total	Exposure in DKKm	5.827	10.446	16.273	

4.5.1 Credit exposure, quality and concentration

In connection with the quarterly review and the on-going follow-up on the Group's loan portfolio is classified in the following categories:

- Portfolio without weakness (3, 2a5)
- Portfolio with some weakness (2b15, 2b30)
- Portfolio with weakness (2c50)
- Portfolio with impairment/provision (1)
- Portfolio without individual classification

Table 7 shows the Group's portfolio based on the review. The classification is based on the methodology used by the Danish FSA.

In their regular inspections, FSA classifies all larger exposures based on the same methodology as the Group does. If there is any difference in classification, the Group adjusts its classification according to the views of FSA. Thus the classification of the larger exposures will be in line with FSA's classification, adjusted for developments since their last inspection.

One advantage of using the FSA classification is transparency and that it gives a frame of reference, since all exposures in Danish banks are classified by FSA. As such the FSA classification constitutes a market standard. As shown in table 7, more than 99% of total exposures are individually classified. The unclassified part of the portfolio has been steadily decreasing.

The classification gives some important insights to the credit quality of the portfolio. 96% of all exposures are labelled without weakness or only with some weakness. This is of importance bearing in mind that banks with high risk portfolios normally fail in their larger loans.

There is a relatively low unsecured exposure in weak exposures (2c50). Above DKK 7.5m there are DKK 39m unsecured exposures and in exposures less than 7.5m there are DKK 22m unsecured.

Large exposures		Table 8	
(DKKm)		2020	2019
20 Largest Exposures (%) of CET1		124%	127%
20 Largest Exposures		2,740	2,558
CET1		2,206	2,023

Credit exposure by geographical area						Table 9				
(DKKm)		2020				2019, total				
Continuing operations	Exposures	in%	Loans/ Credits	Guarantees	Unused credits	Exposures	in%	Loan/ Credits	Guarantees	Unused credits
Faroe Islands	9,374	79%	6,824	736	1,754	9,022	55%	6,618	1,033	1,306
Denmark	181	2%	115	37	30	5,344	33%	2,880	1,441	1,003
Greenland	2,364	20%	971	627	766	1,908	12%	844	473	590
Total	11,918	100%	7,910	1,401	2,549	16,273	100%	10,342	2,947	2,890
Discontinued operations										
Denmark	4,696	100%	2,387	1,437	857					
Total	4,696	100%	2,387	1,437	857					

The Group's overall target is for no industry to make up more than 10% of the Group's total exposure, see table 10, except for the industry group "Trade" which may be up 15%.

In special cases, exposures may be above 10% of the capital base, but only for customers of a high credit quality, and where the Group has accepted collateral. The Group has a few customers with exposures exceeding 10% of the capital base all, but one classified 2b15, of which are classified 2a or 3.

As can be seen from table 10 no single industry, except Property administration, exceeds 10% of total exposures.

Personal loans account for about 41.5% of the Group's total loans and advances. The vast majority of the personal loans in the Faroe Islands involve loans for the purchase of real estate in which the Group holds a first mortgage secured against the property.

Risk exposure concentrations Continuing operations	2020		2019	
	DKKm	In %	DKKm	In %
	Public authorities	860	7.2%	754
Corporate sector:				
Agriculture and farming, others	80	0.7%	66	0.4%
Aquaculture	139	1.2%	5	0.0%
Fisheries	1,048	8.8%	709	4.4%
Manufacturing industries, etc.	334	2.8%	362	2.2%
Energy and utilities	383	3.2%	460	2.8%
Building and construction, etc	998	8.4%	566	3.5%
Trade	765	6.4%	890	5.5%
Transport, mail and telecommunications	602	5.1%	435	2.7%
Hotels and restaurants	59	0.5%	33	0.2%
Information and communication	32	0.3%	62	0.4%
Property administration, etc.	1,233	10.3%	1,028	6.3%
Financing and insurance	136	1.1%	141	0.9%
Other industries	308	2.6%	494	3.0%
Total corporate sector	6,118	51.3%	5,251	32.3%
Personal customers	4,941	41.5%	10,268	63.1%
Total	11,918	100.0%	16,273	100.0%
Credit institutions and central banks	1,829		1,165	
Total incl. credit institutions and central banks	13,748		17,438	

**Risk exposure concentrations
Discontinued operations**
Table 11

	2020	
	DKKm	In %
Public authorities	-	0.0%
Corporate sector:		
Agriculture and farming, others	3	0.1%
Aquaculture	0	0.0%
Fisheries	0	0.0%
Manufacturing industries, etc.	1	0.0%
Energy and utilities	0	0.0%
Building and construction, etc	8	0.2%
Trade	10	0.2%
Transport, mail and telecommunications	2	0.0%
Hotels and restaurants	1	0.0%
Information and communication	12	0.2%
Property administration, etc.	16	0.3%
Financing and insurance	16	0.3%
Other industries	39	0.8%
Total corporate sector	108	2.3%
Personal customers	4,588	97.7%
Total	4,696	100.0%
Credit institutions and central banks	53	
Total incl. credit institutions and central banks	4,749	

Collateral	Continuing operations	Discontinued operations	Table 12
(in %)	2020	2020	2019
Cars	3%	3%	3%
Real Estate	76%	92%	74%
Aircrafts & Ships	6%		6%
Other	15%	5%	17%
Total	100%	100%	100%

4.6 Risk mitigation

As provided in the Group's overall credit policy, the Group seeks to minimize actual risk taking. Accordingly, the Group generally requires collateral for any credit facility granted. What kind of collateral the Group may require when granting a loan depends on the account / customer involved and is subject to an individual assessment of each credit application.

The types of collateral most frequently provided are real estate, ships / aircraft and motor vehicles in addition to guarantees provided by owners or, in the Faroese market, by floating charge (virksomhedspant).

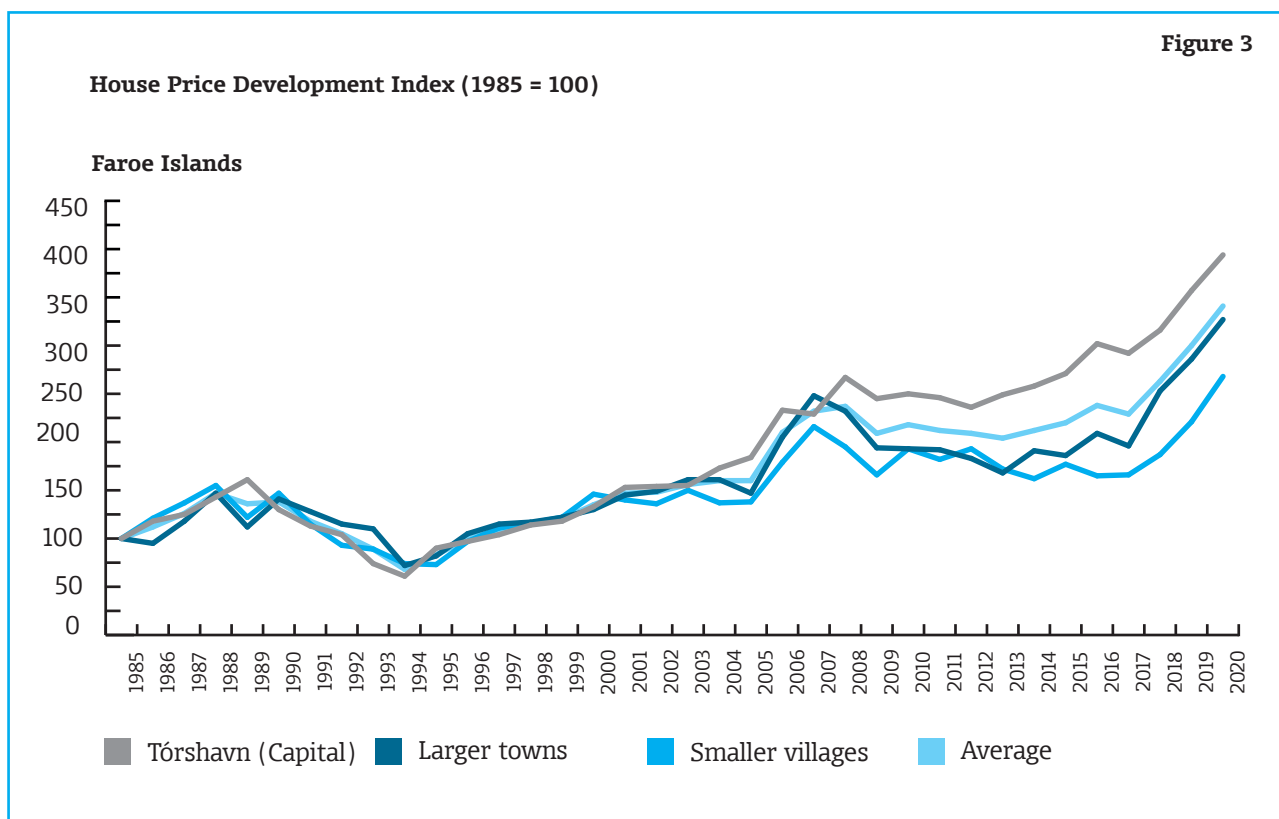
The Group regularly assesses the value of collateral provided in terms of risk management. It calculates the value as the price that would be obtained in a forced sale less deductions reflecting selling costs and the period during which the asset will be up for sale.

To allow for the uncertainty associated with calculating the value of collateral received, the Group reduces such value by way of haircuts, see table 12. For real estate, haircuts reflect the expected costs of a forced sale and a margin of safety. This haircut is 20% of the expected market value. For unlisted securities, guarantees by third party (exclusive of guarantees from public authorities and banks) and collateral in movables, the haircut is 100%.

Credit exposure and collateral for 2020					Table 13
Continuing operations					
(DKKm)	Personal customers	Corporate sector	Personal & corporate	Public	Total
Exposure	4.941	6.118	11.059	860	11.918
Loans, advances & guarantees	3.698	3.736	7.434	476	7.910
Collateral	3.917	3.773	7.690	1	7.691
Impairments	73	252	325	0	326
Unsecured (of exposed)	1.024	2.378	3.401	857	4.258
Unsecured (loans, advances and guarantees)	737	1.110	1.847	0	1.847
Unsecured ratio	21%	39%	31%	100%	36%
Unsecured ratio, loans and advances	20%	30%	25%	0%	23%
Discontinued operations					
(DKKm)	Personal customers	Corporate sector	Personal & corporate	Public	Total
Exposure	4,588	108	4,696		4,696
Loans, advances & guarantees	2,340	47	2,387		2,387
Collateral	2,787	50	2,837		2,837
Impairments	136	4	141		141
Unsecured (of exposed)	1,801	58	1,859		1,859
Unsecured (loans, advances and guarantees)	1,262	31	1,293		1,293
Unsecured ratio	39%	54%	40%		40%
Unsecured ratio, loans and advances	54%	66%	54%		54%
Credit exposure and collateral for 2019, total					
(DKKm)	Personal customers	Corporate sector	Personal & corporate	Public	Total
Exposure	10.268	5.252	15.520	754	16.273
Loans, advances & guarantees	6.460	3.379	9.839	504	10.343
Collateral	7.227	2.907	10.134	35	10.169
Impairments	227	267	494	0	495
Unsecured (of exposed)	3.061	2.351	5.412	720	6.132
Unsecured (loans, advances and guarantees)	2.136	1.152	3.288	478	3.766
Unsecured ratio	30%	45%	35%	95%	38%
Unsecured ratio, loans and advances	33%	34%	33%	95%	36%

Table 13 shows the Group's total credit exposure and the collateral for the loans granted divided into private, corporate and public sector. The Group's collateral is mainly in real estate.

Figure 3



There are no publicly available statistics illustrating developments in house prices in Greenland. The Group estimates that house prices in the latest years have been relatively stable.

The Group offers fixed-rate and floating rate mortgage loans to private customers in the Faroese market in cooperation with Danish mortgage provider DLR Kredit. In the Danish and Greenlandic markets, mortgage loans are distributed in cooperation with Danish mortgage providers Totalkredit and DLR Kredit.

4.7 Monitoring and portfolio management

BankNordik monitors credit facilities centrally through its credit systems. Customers showing a weak financial performance are transferred to a watch list enabling the Group to monitor them more closely and thereby reduce the risk of losses. At least once a year, a review of all exposures above a certain amount is performed.

Distribution of past due amount								Table 14
Continuing operations		2020			2019, total			
(DKKm)	Exposure	Past due total	Past due > 90 days	Total balance with past due	Exposure	Past due total	Past due > 90 days	Total balance with past due
Portfolio without weakness (3, 2a)	5,504	9	0	482	6,821	10	0	944
Portfolio with some weakness (2b, 2b)	5,488	20	1	1,388	8,069	32	1	1,618
Portfolio with significant weakness (2c)	324	1	0	190	451	2	1	184
Portfolio with impairment/provision (1)	496	5	2	168	717	10	4	253
Portfolio without individual classification	106	0	0	6	215	1	0	4
Total	11,918	35	3	2,234	16,273	55	6	3,003
Past due in % of exposure		0.3%	0.0%			0.3%	0.0%	
Discontinued operations		2020						
(DKKm)	Exposure	Past due total	Past due > 90 days	Total balance with past due				
Portfolio without weakness (3, 2a)	1,810	3	0	160				
Portfolio with some weakness (2b, 2b)	2,564	5	0	384				
Portfolio with significant weakness (2c)	74	0	0	20				
Portfolio with impairment/provision (1)	202	1	0	52				
Portfolio without individual classification	45	0	0	6				
Total	4,696	9	0	621				
Past due in % of exposure		0.2%	0					

Unauthorized overdrafts are automatically referred to the customer's adviser, who decides whether or not to accept the overdraft. For good customers, the Group often accepts one or more accounts being overdrawn for a certain period of time. If the overdraft is not accepted, a reminder procedure is initiated. As shown in table 14, DKK 3m is more than 90 days past due.

4.7.1 Credit risk management

The Group monitors on a continuing basis and reviews at least once a year which segments should be given extra attention.

On a continuing basis credit audits are conducted and additionally, based on monthly generated credit risk reports, the business units and the Credit Department monitor and review credit quality and on a quarterly basis the Credit Department prepares a credit risk report to the Credit Committee and the Board of Directors.

4.8 Impairment/Losses

The Group tests the entire loan portfolio for impairment four times per year. Table 15 shows the Group's total losses by industry from 2008 to 2020. As the table shows, the average loss ratio during the overall period was 0.8% of the Group's total loans and guarantees. As can be seen from the data, there are relatively large variations from year to year and from industry to industry.

Historical Losses														Table 15	
Sector:	Weighted	2020	2019	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	
Retail	0.3%	0.1%	0.1%	0.0%	0.6%	1.3%	0.7%	0.6%	0.4%	0.2%	0.3%	0.1%	0.1%	0.0%	
Agriculture	0.2%	0.0%	0.0%	0.8%	0.0%	1.6%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	
Aquaculture	1.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Fishing industry	3.0%	0.3%	0.9%	0.5%	1.7%	0.5%	1.1%	3.1%	1.5%	11.9%	14.0%	2.8%	5.7%	0.0%	
Manufacturing industries etc.	1.5%	0.0%	0.1%	0.1%	12.1%	3.2%	0.0%	0.0%	0.2%	0.2%	0.3%	0.6%	0.0%	0.0%	
Building and construction etc.	2.1%	1.1%	2.9%	0.0%	3.3%	0.2%	0.4%	0.6%	0.2%	0.9%	0.3%	6.2%	16.0%	0.0%	
Trade, hotels and restaurants	0.9%	0.1%	0.1%	0.3%	0.5%	0.6%	0.1%	0.6%	1.3%	4.0%	2.7%	3.1%	0.0%	0.0%	
Transport, mail and telephone	0.3%	0.0%	0.0%	0.0%	1.1%	0.2%	0.0%	0.1%	0.1%	2.6%	0.0%	0.0%	0.0%	0.0%	
Service	0.5%	0.0%	0.0%	0.0%	0.1%	0.2%	0.0%	0.1%	0.4%	2.0%	3.0%	1.6%	0.0%	0.0%	
Property adm., purchase and sale and business services	1.9%	0.0%	0.0%	0.1%	9.4%	0.8%	1.8%	7.0%	2.5%	0.4%	0.5%	5.7%	0.0%	0.0%	
Other services	0.1%	0.1%	1.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Public Authorities	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Total	0.8%	0.1%	0.1%	0.2%	1.5%	1.1%	0.6%	1.0%	0.7%	1.1%	0.9%	1.5%	1.1%	0.0%	

From 1 January 2020, the Group's impairments reflect the expected credit loss impairment model in IFRS 9 and Executive Order on Financial Reports for Credit Institutions and Investment Firms, etc. as valid in the Faroe Islands. The expected credit loss is calculated for all individual facilities as a function of the probability of default (PD), the exposure at default (EAD) and the loss given default (LGD). All expected credit loss impairments are allocated to individual exposures. For all exposures with objective indication of being subject to impairment in creditworthiness, stage 3 exposures, the Group determines the expected credit losses individually.

If a loan, advance or amount due is classified to stage 3, the Group determines the individual impairment charge. The charge equals the difference between the carrying amount and the present value of the estimated future cash flow from the asset, including the realisation value of collateral, in three weighted scenarios – the basecase, upside and downside scenario. Loans and advances not classified as stage 3 are classified in stage 1 or stage 2 and the expected credit loss is calculated in accordance with the function described above and then impaired. Table 16 provides a breakdown of individual impairments, stage 3, and statistical based impairments, stage 1 and 2.

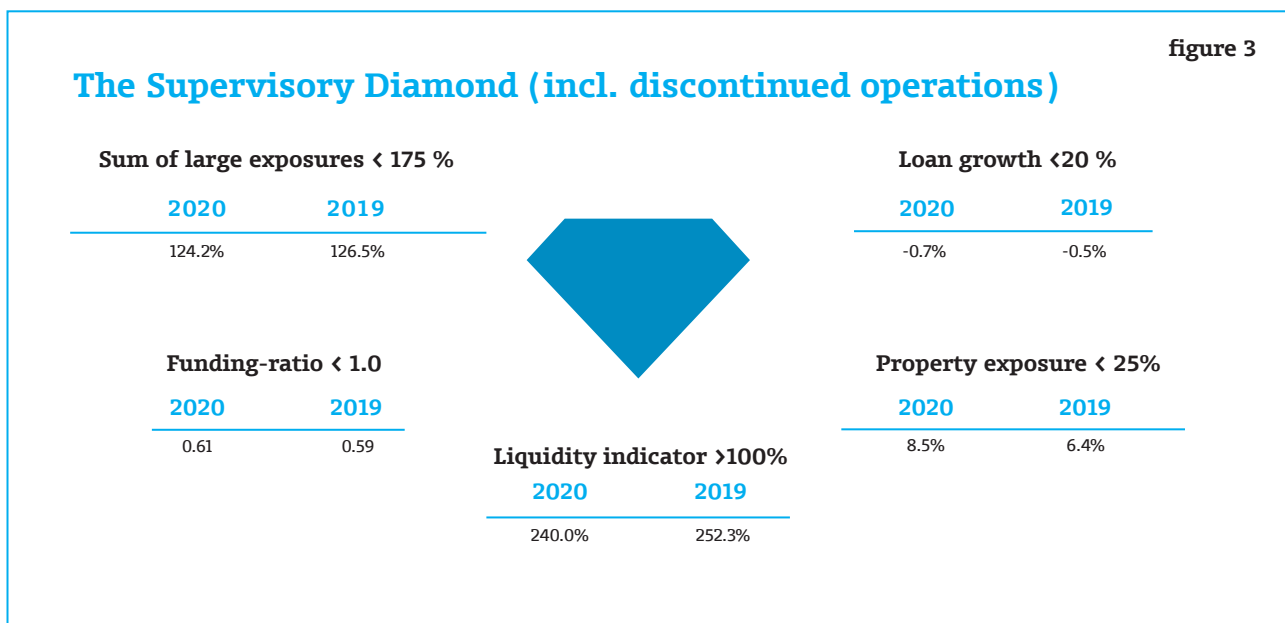
Specification of individual and statistic impairments
Table 16

Continuing operations	2020		2019, total	
	Loans gross	Individual impairments	Loans gross	Individual impairments
DKKm				
Individual impairments:				
Faroe Islands	253	95	605	144
Denmark	70	92	346	252
Greenland	95	27	137	43
Total	418	214	1087	439
Statistic impairments:				
Faroe Islands	6,571	71	6,013	18
Denmark	45	4	2,535	21
Greenland	876	38	707	10
Total	7,910	114	9,255	50
Discontinued operations	2020			
DKKm	Loans gross	Individual impairments		
Individual impairments:				
Denmark	171	105		
Total	171	105		
Statistic impairments:				
Denmark	2,215	36		
Total	2,215	36		

In connection with the acquisition of Sparbank (2010) and Amagerbanken (2011), the Group took over some of the exposures that were individually impaired and some of these exposures are a part of the continued operation. These impairments are recognised as part of the purchase price for the acquired exposures. In 2020 DKK 57.4m of the impairments reflected in the table above are individual impairments recognised up to 12 months after the acquisition of the relevant exposure.

4.9 The Supervisory Diamond (incl. discontinued operations)

The Danish FSA applies a model for measuring whether a bank has a high-risk profile – the Supervisory Diamond. The model identifies five areas considered to be indicators of increased risk if not within certain limits. The Group meets by a wide margin the limits for large exposures, loan growth, exposures towards property, funding-ratio and the liquidity indicator.



5. Market Risk

5.1 Organisation

The Bank has established an Investment Working Group to monitor the financial markets and continuously update its view on the financial markets. The Investment Working Group meets once a month to discuss the outlook for the financial markets and make an update containing a recommendation on tactical asset allocation to the Investment Group. The Investment Working Group refers to the Investment Group. Participants in the Investment Group are the CEO, the CFO, the COO, the CIO, the Financial Manager and Treasury. Based on the recommendation, the Investment Group decides whether to retain or revise the Bank's official outlook. The Investment Group's decisions are communicated throughout the organization and form the basis for all advice provided to customers and included in the Bank's official Markets Update.

5.2 Definition

The Group defines market risk as the risks taken in relation to price fluctuations in the financial markets. Several types of risk may arise and the Bank manages and monitors these risks carefully.

BankNordik's market risks are

- Interest rate risk: risk of loss caused by a upward change in interest rates
- Exchange rate risk: risk of loss from positions in foreign currency when exchange rates change
- Equity market risk: risk of loss from falling equity values

5.3 Policy and responsibility

The Group's market risk management relates to the Group's assets, liabilities and off-balance-sheet items. The Board of Directors defines the overall policies / limits for the Group's market risk exposures, including the overall risk limits. The limits on market risks are set with consideration of the risk they imply, and how they match the Group's strategic plans. On behalf of the Executive Board, the Group Risk Committee is responsible for allocating the market risk to the Group's major business areas. Historically, lines have mainly been granted to Treasury. Treasury is responsible for monitoring and handling the Bank's market risks and positions. Markets have been granted small market risk lines for its daily operations. The Finance Department reports market risks to the Executive Board on a monthly basis.

Reporting of Market risk	Table 17
	Board of Directors
Monthly	Overview of – Interest risk – Exchange risk – Equity market risk – Liquidity risk
	Executive Board
Monthly	Overview of – Interest risk – Exchange risk – Equity market risk – Liquidity risk
Daily	Overview of – Interest risk – Equity market risk – Liquidity risk

5.4 Control and management

The stringent exchange rate risk policies support the Group's investment policy of mainly holding listed Danish government and mortgage bonds. The Finance Department monitors and reports market risk to the Board of Directors and the Executive Board on a monthly basis.

Market Risk Management					Table 18
Level	Board of Directors	Executive Board	CFO	Financial Manager	Treasury
Strategic	Defines the overall market risk				
Tactical		Delegating risk authorities to relevant divisions		Managing the Bank's market risk	Implementing
Operational			Controlling & Reporting		Trading

5.5 Market risk

Table 19 shows the likely after tax effects on the Bank's share capital from likely market changes.

Likely after tax effects from changes in markets value						Table 19
	Change	2020	% of Core Capital	2019	% of Core Capital	
Equity risk DKKm (+/-)	10%	25	1.0%	25	1.1%	
Exchange risk DKKm (+/-) EUR	2.25%	-	0.0%	0	0.0%	
Exchange risk DKKm (+/-) Other currencies	10%	1	0.1%	2	0.1%	
Foreign exchange risk, %		1	0.0%	1	0.1%	
Interest rate risk DKKm (parallel shift)	100 bp	8	0.3%	31	1.4%	

- All equity prices fall by 10%.
- All currencies change by 10% (EUR by 2.25%)
- Foreign exchange risk
- Upwards parallel shift of the yield curve of 100 bp.

The calculations show the potential losses for the Group deriving from market volatility.

5.6 Interest rate risk

The Group's policy is to invest most of its excess liquidity in LCR compliant bonds. As a consequence, BankNordik holds a large portfolio of bonds, and most of the Group's interest rate risk stems from this portfolio.

The Group's interest rate risk is calculated according to the requirements of the Danish FSA. The interest rate risk is defined as the effects of a one percentage point parallel shift of the yield curve. BankNordik offers fixed rate loans to corporate customers. The interest rate risk from these loans is hedged with interest rate swaps on a one-to-one basis. Table 20 shows the Group's overall interest rate risk measured as the expected loss on interest rate positions that would result from a parallel upward shift of the yield curve.

Interest rate risk broken down by Currency			Table 20
DKKm	2020	2019	
DKK	11	27	
EUR	-	13	
Interest rate risk	11	40	

5.7 Exchange rate risk

BankNordik's base currency is DKK and assets and liabilities in other currencies therefore imply an extra risk as they may vary in value over time relative to DKK. BankNordik's core business as a commercial bank makes it necessary to have access to foreign currencies and to hold positions in the most common currencies. Given the uncertainty of currency fluctuations, BankNordik's policy is to maintain a low currency risk. The Group's exchange rate risk mainly stems from customer loans / deposits in foreign currency.

Foreign exchange position		Table 21	
DKKm	2020	2019	
Assets in foreign currency	23	30	
Liabilities and equity in foreign currency	0	0	
Exchange rate indicator 1	23	30	
Exchange rate indicator 2	1	2	

5.8 Equity market risk

BankNordik's stringent risk policy restricts equity positions to listed and liquid shares and shares related to the Danish banking sector. The Group occasionally holds unlisted shares, for example in connection with taking over and reselling collateral from defaulted loans. The Group has acquired holdings in a number of unlisted banking related companies. These are mainly investments in companies providing financial infrastructure and financial services to the Bank. For some of these investments, BankNordik's holding is rebalanced yearly according to the business volume generated by the Bank to the company in question.

Equity risk		Table 22	
DKKm	2020	2019	
Shares/unit trust certificates listed on the Copenhagen Stock Exchange	56	56	
Other shares at fair value based on the fair-value option	253	256	
Total shares etc.	309	312	

6. Liquidity Risk

6.1 Definition

Liquidity risk is defined as the risk of loss resulting from

- Increased funding costs
- A lack of funding of new activities
- A lack of funding to meet the Group's commitments

The Board of Directors has defined the Bank's liquidity limits for the daily operational level and for budgeting plans. The Danish FSA has designated BankNordik as a systematically important financial institution (SIFI). With a liquidity coverage ratio (LCR) of 231 % at 31. December 2020 BankNordik's liquidity position remains robust.

6.2 Control and management

Liquidity risk is a fundamental part of the Group's business strategy. The Group's liquidity is monitored and managed by Treasury on a daily basis in accordance with the limits set by the Board of Directors and reported to the Executive Board by the Finance Department. A liquidity report with stress tests is submitted to the Executive Board and the Group Risk Committee on a monthly basis. Treasury has the operational responsibility for investment of the liquidity, while Finance Department is responsible for reporting and monitoring liquidity. The Group has implemented contingency plans to ensure that it is ready to respond to unfavorable liquidity conditions.

6.2.1 Operational liquidity risk

The objective of the Group's operational liquidity risk management is to ensure that the Group has sufficient liquidity at all times to handle customer transactions and changes in liquidity. BankNordik complies with LCR requirements and therefore closely monitors the bond portfolio with regards to holding sufficient LCR compliant bonds.

Liquidity Management		Table 23			
	Board of Directors	Executive Board	CFO	Financial Manager	Treasury
Objective	Defines the objectives for liquidity policies				
Tactical		Sufficient and well diversified funding		Planning	Providing background materials
Operational			Controlling & reporting	Monitoring	Establish contact

6.2.2 Liquidity stress testing

BankNordik has incorporated a liquidity stress testing model based on LCR. This model is used at least monthly to forecast developments in the Bank's liquidity on a 3-month and a 3-12-month horizon. The test is based on the business-as-usual situation with outflows from undrawn committed facilities and further stress measures. If the 3-month target is not met, the Executive Board must implement a contingency plan.

6.2.3 Twelve-month liquidity

The Bank's 12-month funding requirements are based on projections – including sale of the Danish branches - for 2021, and takes the market outlook into account.

6.2.4 Structural liquidity risk

Deposits are generally considered a secure source of funding. Deposits are generally short term but their historical stability enables BankNordik to grant customer loans with much longer terms e.g. 25 years to fund residential housing. It is crucial for any bank to handle such maturity mismatch and associated risk, and therefore it is essential to have a reputation as a safe bank for deposits. Table 24 shows assets and liabilities by a maturity structure. In order to minimize liquidity risk, BankNordiks policy is to have strong liquidity from different funding sources.

6.2.5 Funding sources

The Group monitors its funding mix to make sure that there is a satisfactory diversification between deposits, equity, hybrid capital, and loans from the financial markets.

6.3 Collateral provided by the Group

As customarily used by financial market participants BankNordik has entered into standard CSA agreements with other banks. These agreements commit both parties to provide and daily adjust collateral for negative market values. The bank with negative value exposure receives collateral. Thereby reducing counterparty risk to daily market fluctuations of derivatives and pledged amount. As a consequence of these agreements BankNordik at yearend 2020 had pledged bonds and cash deposits valued at DKK 67m under these agreements. BankNordik also provides collateral to the Danish central bank to give the Bank access to the intraday draft facility with the central bank as part of the Danish clearing services for securities. At yearend 2020, this collateral amounted to DKK 27m.

Remaining maturity							Table 24
DKK 1,000							
2020	0-1 months	1-3 months	3-12 months	More than 1 year	Without fixed maturity	Total	
Cash in hand and demand deposits with central banks	208,010	0	0	0		208,010	
<i>Hereof discontinued operations</i>	15,310					15,310	
Due from Credit institution	1,177,476					1,177,476	
<i>Hereof discontinued operations</i>	52,800					52,800	
Loans and advances	113,113	363,106	1,164,908	3,563,372	4,634,401	9,838,901	
<i>Hereof discontinued operations</i>	25,646	82,325	264,113	807,905	1,050,733	2,230,722	
Bonds	277,152	2,702,737	100,098	1,392,634	0	4,472,621	
Shares	309,443	0	0	0	0	309,443	
Bonds and Shares	586,595	2,702,737	100,098	1,392,634	0	4,782,064	
Derivatives	12,345					12,345	
Other Assets	996,935	66,014		0	202,606	1,265,555	
Total assets	3,094,474	3,131,857	1,265,006	4,956,006	4,837,007	17,284,351	
Due to credit institutions and central banks	28,292					28,292	
Deposits	12,482,994	77,047	9,778	44,092	1,549,639	14,163,550	
<i>Hereof discontinued operations</i>	5,667,183	34,979	4,439	20,017	703,524	6,430,142	
Issued bonds							
Other liabilities	29,571	67,181	11,478	28,654	184,140	321,025	
Lease liabilities	829	1,658	7,461	25,025	67,134	102,107	
Provisions for liabilities				22,749		22,749	
Subordinated debt					224,695	224,695	
Equity					2,227,024	2,227,024	
Total	12,541,686	145,885	28,717	120,521	4,296,633	17,089,442	
Off-balance sheet items							
Financial Guarantees	583,259					583,259	
<i>Hereof discontinued operations</i>	297,636					297,636	
Other commitments	324,855					324,855	
<i>Hereof discontinued operations</i>	53,158					53,158	
Total	908,114					908,114	
2019	0-1 months	1-3 months	3-12 months	More than 1 year	Without fixed maturity	Total	
Cash in hand and demand deposits with central banks	263,198					263,198	
Due from Credit institution	876,947					876,947	
Loans and advances	94,597	562,711	1,267,692	11,677,021		13,602,020	
Bonds	53,812	309,393	831,070	4,496,624		5,690,898	
Shares	312,175					312,175	
Bonds and Shares	365,987	309,393	831,070	4,496,624		6,003,073	
Derivatives	3,497					3,497	
Other Assets	942,144	58,434		9,542	223,321	1,233,440	
Total assets	2,546,369	930,537	2,098,761	16,183,187	223,321	21,982,175	
Due to credit institutions and central banks			16,477	57,741		74,217	
Deposits	10,139,246	1,439,930	2,159,898	1,439,943		15,179,016	
Derivatives							
Issued bonds							
Other liabilities	149,475	76,954	15,898	3,629	53,370	299,326	
Lease liabilities	829	1,658	7,461	25,025	74,992	109,965	
Provisions for liabilities				23,459		23,459	
Subordinated debt	957	1,914	6,698	283,495		293,063	
Equity					2,263,088	2,263,088	
Total	10,290,507	1,520,456	2,206,430	1,809,833	2,391,450	18,218,676	
Off-balance sheet items							
Financial Guarantees	522,188					522,188	
Other commitments	322,774					322,774	
Total	844,961					844,961	

7. Operational Risk

The capital adequacy regulation stipulates that banks must disclose all operational risks.

7.1 Definition

Operational risk is defined as follows:

“Risk of loss resulting from inadequate or faulty internal procedures, human errors and system errors, or because of external events, including legal risks.”

Operational risk is thus often associated with specific and non-recurring events, such as clerical or record-keeping errors, defects or breakdowns of the technical infrastructure, fraud by employees or third-parties, failure to comply with regulatory requirements, fire and storm damage, litigation or codes of conduct or adverse effects of external events that may affect the operations and reputation of the Bank.

7.2 Policy

The Bank seeks to minimise its operational risks throughout the organisation by means of an extensive system of policies and control arrangements, which are designed to optimise procedures.

7.3 Measurement and control

At the organisational level, banking activities are kept separate from the controlling functions. Independent auditors perform the internal auditing in order to ensure that principles and procedures are complied with at all times.

Although the Bank has implemented risk controls and taken loss-mitigating actions, and substantial resources have been devoted to developing efficient procedures and training staff, it is not possible to implement procedures that are fully effective in controlling all operational risks. The Bank has therefore taken out insurance in respect of property, office equipment, vehicles and employee compensation as well as general liability and directors' and officers' liability. In addition, the Bank has taken out insurance against theft, robbery, amounts lost in cash transports between branches or in the post up to a reasonable figure. The Bank believes that the type and relative amounts of insurance that it holds are in accordance with customary practice in its business area.

Assessing the Bank's operational risks in the IT field is considered an important area. The Bank's IT department and management regularly review IT security, including contingency plans for IT breakdowns etc., that are designed to ensure that operations can continue at a satisfactory level in case of extraordinary events. All IT systems running at BankNordik and from the bank's service providers must adhere to documented running schedules and guidelines. IT operations must be safe and stable, a requirement complied with through the greatest possible degree of automation and capacity adjustments. IT services run by service providers must be based on written agreements.

The Bank has not been involved in any governmental, legal or arbitration proceedings (nor is the Bank aware of any such proceedings pending or being threatened) during a period covering at least the preceding 12 months, which may have, or have had in the recent past a material adverse impact on the Bank's financial position or profitability.

Pursuant to the Executive Order for the Faroe Islands on the governance and management of banks, etc. (Bekendtgørelse for Færøerne om ledelse og styring af pengeinstitutter m.fl.) and the Danish FSA's guidelines, the Bank is required to perform a qualitative assessment of its control environment. Control environment is a collective term for the resources the bank applies to minimise the risks involved in carrying on the financial business. Such resources would include an assessment of the scope of internal business procedures, the degree of functional segregation, and whether the necessary management and control tools are in place in all relevant business areas.

7.4 Long-term goals in operational risk management

In addition to monitoring the level of risk for assessing the capital requirement for operational risk, the Bank's monitoring system is designed to gather new statistics on operational risk. The long-term objective is for the monitoring system monitoring the level of operational risk in the Bank's branches on a monthly basis to have a preventive effect and to help to minimise the Bank's operational risk.

8. Insurance Risk

Insurance risk in the Group consists mostly of non-life insurance risk. The Group has a non-life insurance company, Trygd and a life insurance company, NordikLív.

Risk exposure for an insurance company can be defined as a contingency event, chain of events or bad management which can by itself, or by accumulation, seriously affect the annual results of the insurer and in extreme cases make it unable to meet its liabilities. Risks for an insurance operation are typically categorized as insurance risk and market risk. Among other risks are currency exchange risk, liquidity risk, counterparty and concentration risk and operational risk.

Careful and prudent risk management forms an integral part of any insurance operations. The nature of insurance is to deal with unknown future incidents resulting in a payment obligation. An important part of managing insurance risk is reinsurance. The Group must protect itself against dramatic fluctuations in technical results by entering into agreements on reinsurance so that the risk of the Group having to pay claims from its own funds is reasonable in relation to the risks assumed, their composition and the company's equity. This is done with statistical spread of risks and accumulation of funds, quantified by statistical methods, to meet these obligations.

The Group has defined internal procedures to minimise the possible loss in regard to insurance liabilities. The insurance companies evaluate their insurance risk on a regular basis for the purpose of optimising the risk profile. Risk management also involves holding a well-diversified insurance portfolio. The insurance portfolio of Trygd is well diversified in personal and commercial lines (see table 25).

8.1 Insurance risk

Trygd covers the insurance liabilities through a portfolio of securities and investment assets exposed to market risk.

(in %)	2020	2019
Commercial lines	35%	36%
Personal lines	65%	64%

DKKkm	2020	2019
Listed securities on stock exchange	179	165
Accounts receivable (total technical provisions)	3	2
Cash and cash equivalents	13	18
Total	195	185

Trygd has invested in investment securities and cash and cash equivalents in the effort to balance the exposure to market and currency risk (see table 26).

8.2 Capital requirements

The effects on BankNordiks solvency, due to the ownership of the insurance company's Trygd and NordikLív, are considered low. According to CRR the risk weighted assets has increased DKK 283m. The negative effect on the solvency thus is 0.6% points.

	Change	2020	2019
Equity risk DKKm (+/-)	10%		
Exchange risk DKKm (+/-) in euro	2.25%		
Exchange risk DKKm (+/-) others currency	10%		
Interest rate risk DKKm (parallel shift) - Trygd	100 bp	1.0	0.8
Interest rate risk DKKm (parallel shift) Total	100 bp		

8.3 Trygd non-life insurance

The Board of Directors and Executive Management of Trygd must ensure that the company has an adequate capital base and internal procedures for risk measurement and risk management to assess the necessary capital base applying a spread appropriate to cover Trygd's risks.

In order to meet these requirements Trygd's policies and procedures are regularly updated. Risk management at Trygd is based on a number of policies, business procedures and risk assessments which are reviewed and must be approved by the Board of Directors annually.

The size of provisions for claims is based on individual assessments of the final costs of individual claims, supplemented with statistical analyses.

The company's acceptance policy is based on a full customer relationship, which is expected to contribute to the overall profitability of the Group. In relation to acceptance of corporate insurance products, the Board of Directors has approved a separate acceptance policy, which is implemented in the handling process of the corporate department.

Reinsurance is an important aspect of managing insurance risk. The Group must protect itself against dramatic fluctuations in technical results by entering into agreements on reinsurance so as to make the risk of the Group having to pay claims from its own funds reasonable in relation to the size of the risk assumed, the risk composition and Trygd's equity.

Trygd has organized a reinsurance program which ensures that e.g. large natural disasters and significant individual claims do not compromise Trygd's ability to meet its obligations. For large natural disasters, the total cost to Trygd will amount to a maximum of DKK 10m. The reinsurance program is reviewed once a year and approved by the Board of Directors.

A change has been made to the reinsurance programme in Trygd from the start of 2020. The change is in regards to the deductible on the Property program where it during 2019 was 10 DKKm for catastrophe and 5 DKKm for single risk, from 2020 there is a lower deductible of 3 DKKm on single and catastrophe risks and an annual aggregated deductible of additional 3 DKKm.

Trygd uses reputable reinsurance companies with strong ratings (A-class ratings at least on S&P or equivalent) and financial positions.

Trygd's Claims Department is responsible for handling all claims and only claims employees deal with claims matters or advise claimants in specific claim cases. Technical provisions to cover future payments for claims arising are calculated using appropriate and generally recognised methods. Insurance provisions are made to cover the future risk on the basis of experience from previous and similar claims. These are updated on a yearly basis taking realized costs of claims into account and the Claims Department are continuously updating and monitoring the claim provisions. These methods and analyses are subject to the natural uncertainty inherent in estimating future payments, both in terms of size and date of payment.

The board of directors of Trygd applies a low risk investment policy. The company's main investments are in bonds and deposits. There is no exchange rate risk, as all investments are based in DKK.

DKKm					
Sector:	2020	2019	2018	2017	2016
Industry	0.67	1.04	-0.68	1.25	2.5
Private	0.34	-0.14	-0.10	0.46	0.43
Accidents	-5.55	-0.17	-1.05	0.19	-0.32
Automobile	3.31	3.56	3.11	2.93	3.39
Total	-1.23	4.28	1.28	4.82	6.00

Contractual maturity for the insurance segment						Table 29
(DKK 1,000)						
2020	On demand	0-12 months	1-5 years	Over 5 years	No stated maturity	Total
Assets						
Securities	179,405					179,405
Reinsurance assets		3,140				3,140
Accounts receivables		6,896				6,896
Restricted cash						
Cash and cash equivalents	13,012					13,012
Total financial assets	192,417	10,036				202,454
Liabilities						
Technical provision		94,696				94,696
Account payable		10,453				10,453
Total financial liabilities		105,149				105,149
Assets - liabilities	192,417	-95,113				97,304
Contractual maturity for the insurance segment						
(DKK 1,000)						
2019	On demand	0-12 months	1-5 years	Over 5 years	No stated maturity	Total
Assets						
Securities	201,773					201,773
Reinsurance assets		2,266				2,266
Accounts receivables		3,909				3,909
Restricted cash						
Cash and cash equivalents	21,691					21,691
Total financial assets	223,464	6,176				229,640
Liabilities						
Technical provision		91,347				91,347
Account payable		12,010				12,010
Total financial liabilities		103,357				103,357
Assets - liabilities	223,464	-97,181				126,283

8.4 NordikLív – Life insurance

NordikLív is a life insurance company established in 2015 and wholly owned by BankNordik. The company began operations in 2016.

NordikLív issues regular life, disability and critical illness insurance covers in the Faroese market and in 2017 the total premiums amounted to DKK 13.2m compared to DKK 11.2m in 2016, and the individual solvency requirement was much lower than the minimum capital requirement defined by law, leaving NordikLív with a capital requirement of DKK 26.1m compared to a capital of DKK 31.3m.

The primary risks of NordikLív are financial risks, insurance risks, operational risks and commercial risks.

NordikLív's investment policy is restrictive and at present NordikLív only holds government bonds and Danish mortgaged backed bonds limiting the primary financial risk to interest rate risk.

In respect of insurance risks these are, due to the company's limited product portfolio, mainly related to disability, costs and the occurrence of a catastrophe. To mitigate these risks NordikLív's under-writing policy is aimed at securing that only risks that can be characterized as normal for the relevant area of insurance are accepted. Further, NordikLív reinsures it's against larger claims, e.g. because of the occurrence of a catastrophe.

Operational risks are the risks of suffering an economic loss due insufficient or the complete lack of internal procedures, human or system based errors or due to external events, including a change in legislation.

Commercial risks are related to the uncertainty of the development of the Faroese life insurance market, change in customer behaviour and demands, a shift in technology and reputational risk.

In order to mitigate operational and commercial risks NordikLív has entered into cooperation agreements with Forenede Gruppeliv and BankNordik providing the company with expert resources within production, administration, internal audit, risk management and compliance.