Capital requirements in the Nordic-Baltic region

Nordic-Baltic Macroprudential Forum



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Disclaimer: This report is intended solely to provide a descriptive overview of macroprudential capital requirements in the Nordic-Baltic region. It does not contain policy recommendations nor represent an agreed policy position of the Nordic-Baltic Macroprudential Forum or its participating authorities of the individual Nordic-Baltic countries.

Introduction

This report was prepared by the *Capital Based Measures Working Group* within the Nordic-Baltic Macroprudential Forum, NBMF, which brings together authorities from the Nordic and Baltic countries to discuss financial stability and macroprudential policy.[1]

The report provides an overview of bank macroprudential capital requirements in the Nordic-Baltic region within the common European regulatory framework. It covers the main components of the macroprudential capital requirements, i.e. the macroprudential capital buffers and risk-weight measures.

The analysis is based on aggregated country-level data and describes the composition and application of macroprudential capital requirements across the region. It is intended to support the discussions and dialogue among relevant authorities, stakeholders and broader public with relevant facts and evidence.

[1] The NBMF is an informal body composed of the governors of the central banks and the heads of supervisory authorities of eight countries (Denmark, Estonia, Finland, Iceland, Latvia, Lithuania, Norway and Sweden). The body has no decision-making powers but is a platform for the Nordic-Baltic countries to discuss risks to financial stability in the region and the implementation of macroprudential measures.

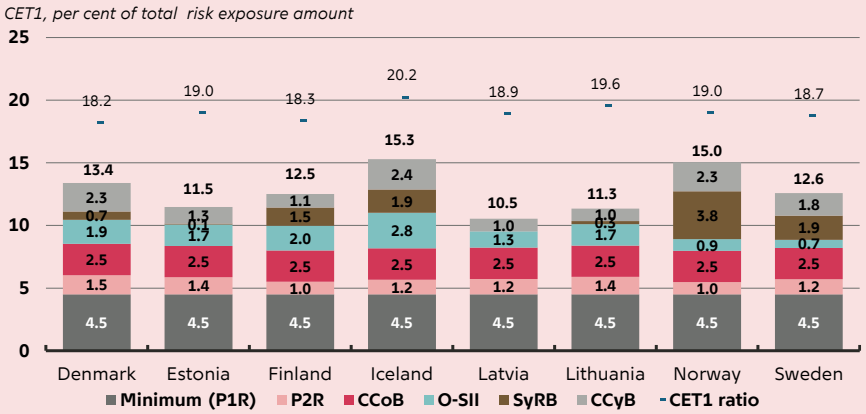
01
Capital requirements in the Nordic-Baltic Region

Chart 1 provides an overview of banks' Common Equity Tier 1, CET1, capital ratios and capital requirements across the Nordic-Baltic countries.[2] For each country, the stacked bar represents the weighted average of CET1 capital requirements across institutions operating in that country.[3]

The bars illustrate the composition of the requirements. The microprudential requirements consist of minimum Pillar 1 requirements and institution-specific Pillar 2 requirements (P2R)[4]. The combined buffer requirement consists of the capital conservation buffer (CCoB) and macroprudential capital buffers (countercyclical capital buffer (CCyB), systemic risk buffer (SyRB) and the buffer for other systemically important institutions (O-SII). The dashes indicate the weighted average CET1 capital ratio for the banking sector in each country.

CHART 1

CET1 capital ratio and effective requirements across the Nordic-Baltic region



Note: Minimum (P1R) = Minimum Pillar 1 requirement; P2R = Pillar 2 requirement; CCoB = Capital conservation buffer; CCyB = Countercyclical capital buffer; SyRB = Systemic Risk buffer; O-SII = capital buffer for other systemically important institutions. For the SyRB and CCyB, the effects of reciprocated requirements are included. The chart shows the part of minimum Pillar 1 and Pillar 2 requirements to be met with CET1 capital. For the total requirement, please see chart 3 in the annex. The figure is based on data on all domestic banks at the highest level of consolidation, including foreign subsidiaries operating in the same jurisdiction. For Latvia data for Swedbank group includes only the local subsidiary Swedbank AS, but not its highest local consolidated level Swedbank Baltics AS to rule out effects resulting from macroprudential capital requirements of other Baltic countries. For Lithuania, the chart is based on data of banks at the highest consolidation level within the country with an adjustment for Revolut, for which the O-SII buffer requirement is formally applicable only at the individual level, but is projected into the consolidated banking sector data. Data for Q4 2025. See the annex for further details.

Source: National authorities based on COREP.

[2] See chart A1 in the annex for an overview of total capital and total capital requirements.
[3] The terms banks and institutions are used interchangeably throughout the text.
[4] While Pillar 2 components include both P2R and Pillar 2 Guidance (P2G), considering that the P2G is not a capital requirement but reflects the relevant national authorities' expectations to the headroom on top of the capital requirements, it is not included in this exercise.

Chart 1 presents the effective capital requirements for each Nordic-Baltic country. The effective capital requirements are calculated by weighting capital requirements according to the relevant banks' risk weighted exposures and therefore reflect the impact of capital requirements on the banking system as a whole. For the SyRB and CCyB, the effects of reciprocated requirements are included. As a result, the effective capital requirements may differ from the nominal requirements set by national authorities. For example, a bank's institution-specific CCyB rate is calculated as the weighted average of the applicable national CCyB rates, based on the geographical distribution of its relevant credit exposures.

Cross-country comparisons should be interpreted with caution. Differences in effective capital requirements reflect not only variations in nominal requirements and the way the total risk exposure amount (TREA) is calculated, but include differences in the exposures of banks and the underlying risks and vulnerabilities that the requirements are intended to address.

All institutions are required to meet a minimum total capital ratio of 8 per cent, comprising a CET1 ratio of at least 4.5 per cent and a Tier 1 capital ratio of at least 6 per cent. The CCoB requires banks to hold an additional 2.5 per cent of CET1 capital above the minimum requirements. As the CCoB is set at the same rate, the buffer is not examined further. The analysis focuses on the macroprudential components of banks' capital requirements. The regulatory minimum (pillar 1 requirements), pillar 2 requirements (P2R) are not examined further in this report.

Cross-border exposures shape the effective requirements of banks

Banking sectors in the Nordic-Baltic region are closely integrated, with many banks holding credit exposures across national borders. Their effective macroprudential capital requirements therefore reflect not only measures set in their home country, but also applicable measures in the countries where their exposures are located. The geographical distribution of exposures is thus important for understanding how national measures translate into effective requirements and for interpreting differences across countries.

Table 1 displays the average country weights used to calculate the exposure-weighted CCyB. Higher values indicate that banks in a given Nordic-Baltic country have a larger average share of their relevant credit exposures in the jurisdiction concerned.

For example, for Denmark, the table shows that 78.0 per cent of Danish banks' relevant credit exposures are within Denmark, 16.7 per cent in other Nordic-Baltic countries and 5.3 per cent in the rest of the world. The weights sum to 100 per cent and are used to calculate the institution-specific CCyB rates of Danish banks.

The data illustrate the high degree of financial integration in the Nordic-Baltic region. Banks typically maintain the largest share of their exposures in their home market, but several banking sectors also have significant cross-border exposures within the region. This is particularly evident for Swedish, Finnish and Estonian banks, which account for sizeable shares of banking activity in neighbouring Nordic and Baltic countries. Overall, Nordic-Baltic banks account for the vast majority of banking activity in most countries in the region, underscoring the close interconnectedness of their financial systems.

TABLE 1

Share of cross-country exposures and average country weights for CCyB

Per cent of the credit exposures in relevant jurisdictions (2025 Q4)

Banks from... → ...operate in ↓	DK	FI	IS	NO	SE	EE	LV	LT
DK	**78.0**	13.8	0.2	1.9	2.2	0	0.2	0
FI	4.2	**46.3**	0.2	1.4	3.9	0.7	0.1	0.8
IS	0	0.1	**94.0**	0	0	0	0	0
NO	3.4	12.4	0.7	**83.7**	6.6	0	0	0
SE	9.1	17.8	0.8	5.5	**66.7**	0.3	1.0	1.3
EE	0	0.6	0.1	0.1	3.4	**64.0**	4.5	0.6
LV	0	0.4	0	0.2	2.5	9.8	**80.2**	0.4
LT	0	1.0	0	0.3	4.1	19.6	9.2	**73.4**
Total in Nordic-Baltic countries (including domestic)	94.7	92.4	96.0	93.1	89.4	94.4	95.2	76.5
Total in other Nordic-Baltic countries (excluding domestic)	16.7	46.1	2.0	9.4	22.7	30.4	15.0	3.1
Countries outside the Nordic-Baltic region	5.3	7.6	4.0	6.9	10.6	5.6	4.8	23.5

Note: The weights reported reflect the share of banks' relevant credit exposures to a specific country. Red shading marks cross-border activity between the Nordic countries, while grey shading marks activity between the Baltic countries. Information regarding the geographical distribution of the exposure amounts and risk-weighted exposure amounts of credit exposures used as a basis for the calculation of institution specific CCyB is publicly disclosed by banks as per requirements of Article 440 of the CRR.

Source: National authorities.

02

Macroprudential capital buffers

The countercyclical capital buffer

Institutions may be subject to a countercyclical capital buffer requirement (CCyB). The CCyB rate is set by the relevant national authority and applies to domestic credit risk exposures, see table 2.

CCyB rates up to 2.5 per cent are subject to mandatory reciprocity. Institutions are therefore required to apply the CCyB rate set by each country to their relevant exposures in that jurisdiction. This ensures that the buffer applies consistently at both the highest level of consolidation (covering subsidiaries, branches and direct cross-border activities of the group) and at the individual institution level, in accordance with the relevant CRD provisions.

The effective requirement faced by banks (the institution-specific CCyB rate) reflects the weighted average of the country-specific CCyB rates, weighted by the geographic distribution of the bank's exposures. Banks with substantial cross-border activities may therefore be less affected by the CCyB rate set in their home country. Nationally set CCyB rates therefore provide only a limited basis for comparing the effective CCyB requirements faced by banks across countries.

In recent years, several of the relevant national authorities have adjusted their strategy for setting the CCyB and many use a so-called positive neutral CCyB rate (PNR CCyB). This policy often strives to achieve greater resilience earlier in the financial cycle thus contributing towards more effective macroprudential space. The implemented CCyB rate is subject to mandatory reciprocity (up to 2.5 per cent), irrespective of the analytical framework or strategy used to determine that rate.

TABLE 2

CCyB rates in the Nordic-Baltic countries

Per cent	DK	EE	FI	IS	LV	LT	NO	SE
Current CCyB rate	2.5	1.5	0	2.5	1.0	1.0	2.5	2.0
Positive neutral CCyB rate		1.0		2.0-2.5	1.0	1.0		2.0

Note: **Denmark** has no explicit PNR CCyB approach but follows a strategy of "early and gradual" build-up of the CCyB up to a certain level. The method and strategy therefore correspond overall to the method followed in the PNR CCyB approach. **Norway** has no explicit PNR CCyB approach but states that the buffer rate should normally be in the upper part of the 0 to 2.5 per cent range. **Iceland** adheres to the principles laid down by decision of the Financial Stability Committee. For **Lithuania**, the CCyB rate of 1.25 per cent is pending implementation by 1 August 2027. For more details regarding the CCyB implementation please see relevant information in the European Systemic Risk Board (ESRB) homepage.

Source: National authorities.

The systemic risk buffer

Under the CRD framework, the SyRB is intended to address systemic risks not covered by the CCyB or the O-SII buffer. It may be applied either to all exposures (or all *domestic* exposures) or in a sector specific manner providing a more targeted approach. The framework provides flexibility in the design and application of the SyRB, while helping to ensure that different macroprudential instruments serve targeted purposes.

Table 3 gives an overview of the current SyRB requirements across Nordic-Baltic countries. While Iceland, Finland, Norway and Sweden apply broad-based SyRBs to general exposures, Denmark and Lithuania use sectoral SyRBs targeted at specific real estate property-related exposures.

TABLE 3

Application of the SyRB in the Nordic-Baltic countries

	Type of SyRB	Exposures in scope	Targeted banks	SyRB Rate (set by domestic authority)	Effective rate (per cent of TREA)	Voluntary reciprocity requested
Denmark	Sectoral	Exposures to real estate companies	All banks	7.0	0.7	Yes
Finland	General	Domestic and foreign exposures	All banks	1.0	1.0	No
Iceland	General	Domestic exposures	All banks	2.0	1.9	No
Lithuania	Sectoral	Domestic retail exposures secured by residential real estate	All banks	2.0	0.3	Yes
Norway	General	Domestic exposures	All banks	4.5	3.8	Yes
Sweden	General	Domestic and foreign exposures	Three largest banks	3.0	3.0*	No

Note: For further information on the background for the measures and the identified systemic risks they address, please refer to the ESRB website or national authorities. The SyRB rate shown in the table is the rate of the SyRB (whether general or sector-specific), as set by the national authority. The effective rate reflects the size of the domestic SyRB requirement expressed in per cent of total REA. For Sweden, the effective rate is measured as the requirement in per cent of TREA for the three banks that the Swedish SyRB applies to – which is why it differs from the rate reported in Chart 1.

Source: National authorities.

SyRB rates in Nordic-Baltic countries range from 1 to 7 per cent, reflecting differences in the risks and vulnerabilities addressed, as well as national specificities. However, nominal rates are not directly comparable across countries. In particular, sectoral SyRBs may have relatively high nominal rates but a limited impact on banks' overall capital requirements when measured against TREA. This reflects their narrower scope, and, in some cases, the relatively low risk weights of the targeted exposures initially set by affected institutions.

The SyRBs in the Nordic-Baltic countries primarily address structural vulnerabilities, including household indebtedness, real estate-related risks, banking sector concentration and cross-border interconnectedness. Their different scopes and calibrations illustrate the flexibility of the SyRB framework in targeting country-specific structural systemic risks.[5]

[5] More information on background for the different measures is available on the European Systemic Risk Board homepage.

Application of reciprocity to systemic risk buffers

Unlike the CCyB, which is directly applicable across borders to banks having relevant exposures, the cross-border application of the SyRB depends on reciprocation decisions by home authorities.[6] Reciprocation may be requested to ensure that a macroprudential measure applies consistently to both domestic institutions and foreign institutions with relevant exposures in the activating country. The aim is to achieve a level playing field and to prevent circumvention through cross-border lending. Reciprocity is typically asked for institutions whose relevant exposures exceed a specified materiality threshold.[7]

As a result, national approaches differ, with some authorities requesting reciprocity while others do not. The decision whether or not to request reciprocity may reflect several considerations, including the scope of the SyRB and the exposures covered. Considerations may often include whether foreign institutions have material exposures to the relevant jurisdiction or sector.

Differences in reciprocity also reflect variation in implementation approaches across countries. The macroprudential authority either adheres to a general "always reciprocate" principle or decides whether to reciprocate based on bank exposures exceeding the materiality threshold.[8] In addition, reciprocity depends on how materiality thresholds are calibrated[9], the level of consolidation at which the buffer is applied, and whether multiple SyRB requirements are applied additively (separately) or as the higher of.

Application of O-SII buffers

The macroprudential framework also includes institution-specific buffers for systemically important institutions (O-SIIs). The identification of O-SIIs and the calibration of O-SII buffer rates are carried out by the relevant national authorities and are reviewed at least annually. Generally, the framework ensures that higher systemic importance of identified O-SIIs results in higher O-SII buffer rates.[10]

[6] An authority that has activated a SyRB may request that the ESRB recommend voluntary reciprocation of the respective buffer by other EU countries.
[7] The ESRB has issued guidance on the calibration of such thresholds, although the activating authority may propose a different threshold if justified by the characteristics of the measure or the exposures concerned.
[8] For more information regarding the reciprocity matrix of the SyRB by the Nordic-Baltic countries please see table A2 and table A3 in the annex.
[9] In practice most countries use a threshold of 1 per cent of relevant exposures, but others apply different thresholds. Lower materiality threshold in essence makes reciprocity wider as more exposures are considered material and more institutions are subject to relevant SyRB requirements.
[10] For more information, including relevant O-SII score as well as applied O-SII buffer rates for all identified O-SIIs in the EU, please see the EBA homepage.

TABLE 4

O-SII buffer set by national relevant authorities of the Nordic-Baltic countries

	DK	EE	FI	IS	LV	LT	NO	SE
O-SII buffer (range, per cent)	1.0-3.0	0.5 or 2.0	0.5 – 2.5	3.0	1.25– 2.0	1.0 or 2.0	1.0 or 2.0	1.0
Number of identified O-SII	7	6	3	3	3	4	4	4

Note: The O-SII buffer aims to address the potential negative effects that significant institutions might have on the domestic financial system if they were to fail. This buffer addresses potential negative effects also arising on the international financial system, especially within the European Union. The O-SII buffer is set individually for each identified O-SII, and in case nominal rate differs for these institutions the resulting effective rate at the country level represents the weighted average level as displayed in chart 1. While most EU institutions have adopted a bucketing approach, there are also other quantitative methods applied in practice (e.g. such as Equal Expected Impact (EEI) model). Qualitative methods, including also expert judgment and additional considerations, can be applied as well. Data for 2025 Q4.
Source: National authorities.

The identification and designation of O-SIIs is based on common principles implemented in the EU regulatory framework and supported by the harmonised methodology under the EBA O-SII identification guidelines. While O-SII identification follows a harmonised methodology, there is no common methodology for calibrating O-SII buffer rates. National authorities determine the calibration of O-SII buffer rates within the general principles of the EU framework. This can include different approaches for calibrating rates, and the granularity of rates.

For countries participating in the Single Supervisory Mechanism (SSM), the ECB assesses nationally set O-SII buffer rates against its floor methodology, under which the lowest bucket corresponds to a floor of O-SII buffer requirement at 0.25 per cent.[11] The O-SII buffer is institution-specific and may be applied at the individual, sub-consolidated or consolidated level.

O-SII buffer rates for subsidiaries of systemically important institutions are subject to a cap linked to the buffer requirement applied at group level.[12] Subsidiary cap limits the O-SII buffer requirement that a host authority may impose on a subsidiary of a banking group whose parent institution is themselves designated as a G-SII or O-SII in another jurisdiction. The cap limits the rate that host authorities may apply, even where the national calibration methodology would result in a higher rate.[13] The current subsidiary cap affecting O-SII buffer rates adds an additional source of variation.

[11] The ECB O-SII floor methodology standardises a minimum level of the O-SII capital buffer for every nationally identified O-SII. In 2024, the ECB introduced more enhanced methodology accounting for the progress made in the Banking Union (so called 'Adjustment for Structural Regional Arrangements or ASTRA' approach) mirroring the G-SIBs framework. This new approach will be fully applicable as of 1 January 2028.
[12] See also Article 131 of the CRD.
[13] Host authority refers to the national authority in the country where the respective subsidiary is located.

03
Other macroprudential capital requirements

In addition to macroprudential capital buffer requirements, the authorities may adjust the risk weights or loss-given-default (LGD) parameters applied to certain exposures. These measures affect the amount of capital required to be held by an institution by adjusting the calculation of risk-weighted exposure amounts. The available measures cover both exposures under the standardised approach (SA) and exposures under the internal ratings-based (IRB) approach. They could, for example, address risks related to exposures secured by residential or commercial immovable property capturing risks and vulnerabilities building up in real estate property markets.

TABLE 5

Macroprudential measures targeting risk weights

Country	CRR article	Approach	Targeted exposures	Measure (level)
Norway	Article 458	IRB	All exposures secured by commercial real estate in Norway	Risk-weight floor: 35%
Norway	Article 458	IRB	All exposures secured by residential real estate in Norway	Risk-weight floor: 25%
Norway	Article 124	SA	Loans secured by holiday homes in Norway	The loan-to-value (LTV) threshold is set at 40% to apply a 20% risk weight
Norway[1]	Article 124	SA	All exposures secured by commercial immovable property in Norway	Exposures secured by commercial real estate, except agricultural property, to be treated as an IPRE-exposure
Sweden	Article 458	IRB	Corporate exposures secured by commercial properties	Risk-weight floor: 35%
Sweden	Article 458	IRB	Corporate exposures secured by residential properties	Risk-weight floor: 25%
Sweden	Article 458	IRB	Retail mortgage exposures	Risk-weight floor: 25%

[1] As such, these exposures are treated in accordance with CRR Article 126(2).

Note: Measures under **Article 124** refer to higher risk weights or stricter criteria on risk weights applied to exposures secured by mortgages on immovable property for institutions applying the SA to the calculation of the own funds requirements. *Reciprocity* of measures under Article 124 is mandatory. **Article 458** refers to other macroprudential measures, including stricter national measures. The tools in this article are often referred to as "tools of last resort" as they can only be used when other measures are not suitable or sufficient to address the identified systemic risks. All measures under Article 458 apply to the exposure weighted average risk weight. Reciprocity for measures in Article 458 is voluntary. Authorities in both **Norway** and **Sweden** have requested reciprocity for the measures.

Source: National authorities.

Table 5 gives an overview of the application of relevant measures in the Nordic-Baltic region. Two countries have currently implemented measures targeting risk weights under Articles 124 and 458 of the CRR affecting the calculation of risk-weighted exposure amounts already at the P1R level and thereby influencing the effective capital requirements.

04
Capital requirements against unweighted exposures

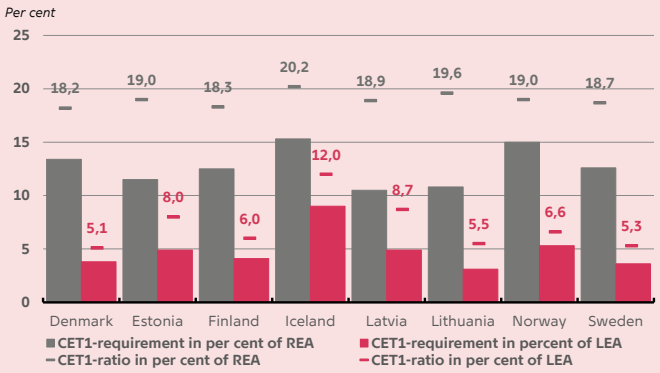
Expressing capital requirements relative to unweighted exposure amounts provides a complementary perspective on the effect of average risk weights. Chart 2 complements the TREA-based comparison (in chart 1) by presenting CET1 capital requirements and CET1 capital ratios relative to the unweighted total exposure amount as expressed by leverage exposure amount (LEA).[14]

This representation can be used to illustrate the differences in average risk weights across countries, see chart 2.B. Lower risk weights reduce risk weighted exposure amounts and, all else equal, lead to lower capital requirements when measured relative to total leverage ratio exposure amount (unweighted amount). A larger gap between weighted and unweighted amounts display overall lower risk weights applied by institutions. This can be due to various aspects, e.g. due to having less risky exposures, applying various risk mitigating conditions, differences in supervisory practices, by employing IRB approach modelling with lower risk weights and other institution specific characteristics.

FIGURE 2.A

CET1 requirements and ratios

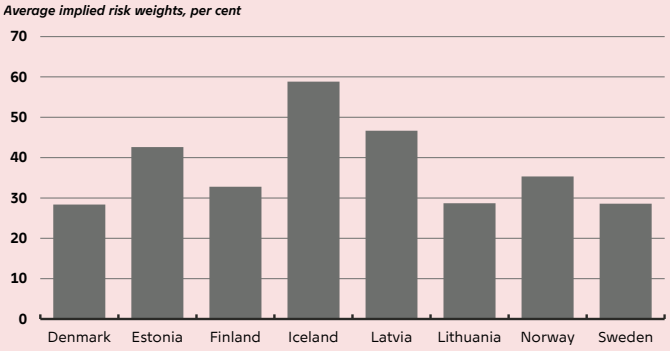
CET1 requirements and ratios expressed in per cent of total risk exposure amount (REA) and total leverage exposure amount (LEA)



Note: P2G is not included in the CET1 capital requirement. The CET1 ratio shows all CET1 reported and held in institutions. The share of IRB institutions (based on total exposure amount) is approximately: DK: 92%, NO: 76%, SE: 71%. The share of IRB banks for EE, FI, LV, and LT is not included considering that the number of significant IRB banks in these countries constitute less than 3. There are no IRB-based institutions in Iceland.
Source: National authorities based on COREP.

FIGUR 2.B

Differences between risk-weighted amount and total leverage exposure amount amounts



Note: The average implied risk weights reflect the ratio between the total risk exposure amount and the total leverage exposure amount.
Source: National authorities based on COREP.

[14] Here the leverage exposure amount, LEA, is represented by the total leverage ratio exposure measure. See also Annex for further details.

An important aspect towards comparability is that while risk weights are standardised and similar for all banks using the standardised approach, the IRB banks take bank-specific considerations into account.[15] This contributes to greater dispersion in risk weighted exposure amounts across IRB banks in different countries. Over time, the phase-in of output floor requirements may reduce some of this variation.

More generally, risk weighted exposures across banks and countries are sensitive to differences in IRB models (that banks employ themselves) and supervisory practices. As a result, cross-country variations in CET1 capital ratios partly reflect differences in average risk weights, especially if a particular banking sector is SA or IRB bank dominated. There could also be differences in average SA risk weights due to variation in exposure classes.

[15] Differences could stem from, e.g., classification and specificities as provided in the common EU framework.

05
Appendix Glossary

CET1	The highest quality of capital as defined by the CRR considering it absorbs losses immediately when they occur. It typically includes shares, retained earnings and other reserves.
CRD	Refers to the Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC.
CRR	Refers to the Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012.
TREA	Total Risk Exposure Amount as defined in COREP C02.00, r0010, c0010.
LEA	Corresponds to "Total Leverage Ratio exposure measure" as defined in COREP C47.00, r0290, c0010.
EBA O-SII identification guidelines	EBA Guidelines (EBA/GL/2014/10) of 16 December 2014 on the criteria to determine the conditions of application of Article 131(3) of Directive 2013/36/EU (CRD) in relation to the assessment of other systemically important institutions (O-SIIs).

06

Data Appendix: additional tables and charts

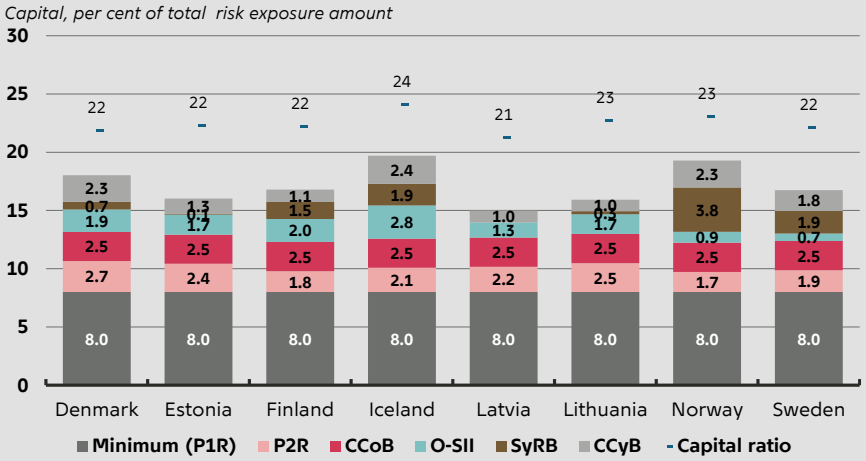
The data in this report is based on COREP data gathered from the Common Reporting Framework as covered in Commission Implementing Regulation (EU) 2024/3117 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to supervisory reporting of institutions and repealing Commission Implementing Regulation (EU) 2021/451.

The sample includes all domestic institutions at the highest available level of consolidation locally for each country's banking sector. For Lithuania, an adjustment is made for Revolut, for which the O-SII buffer requirement is formally applicable only at the individual level, but is projected into the consolidated banking sector data. For Latvia data for Swedbank group includes only the local subsidiary Swedbank AS, but not its highest local consolidated level Swedbank Baltics AS to rule out effects resulting from macroprudential capital requirements of other Baltic countries.

Capital requirements reported as numbers are aggregated for each country. Capital requirements or capital ratios reported as percentages are weighted by each reporting institution's TREA prior to aggregation. The cut-off date is 2025 Q4.

CHART 3

Total capital ratio and requirements



Note: TREA = Total Risk Exposure Amount. P2R = Pillar 2 requirement; CCoB = Capital conservation buffer; CCyB = Countercyclical capital buffer; SyRB = Systemic Risk buffer; O-SII = capital buffer for systemically important institutions.
Source: National authorities based on COREP.

TABLE 6

General SyRB in the Nordic-Baltic countries and reciprocated levels

Bank from → Operates in: ↓	DK	EE	FI	IS	LV	LT	NO	SE
DK			1.0					3.0
EE			1.0					3.0
FI			1.0					3.0
IS			1.0	2.0				3.0
LV			1.0					3.0
LT			1.0					3.0
NO	4.5	0	4.5	0	0	4.5	4.5	4.5
SE			1.0					3.0

Note: The table shows the reciprocity arrangements for general systemic risk buffers only, i.e. for systemic risk buffers applying to all (FI, SE) or domestic exposures (IS, NO). For **Finland** – considering general SyRB set at 1 per cent applies to all domestic and foreign exposures and to all Finnish banks, it is effectively relevant for banks operating in other jurisdictions at the same rate regardless of if there is local SyRB present. Also, banks need to apply the higher of either domestically set general SyRB or reciprocated SyRB rate (both general and sectoral) of the relevant jurisdiction. For **Sweden** – the SyRB applies to all domestic and foreign exposures for the three largest banks in Sweden only (Skandinaviska Enskilda Banken AB, Svenska Handelsbanken AB and Swedbank AB). "0" indicates that the buffer has not been reciprocated, and the relevant exposures of domestic banks are below the applicable materiality threshold, but "empty cells" indicate that no reciprocity was asked or such measure (general SyRB) does not exist. **Reciprocation**: Norway has requested reciprocity for institutions with relevant exposures exceeding NOK 5 billion.

Source: National authorities.

TABLE 7

Sector-specific SyRB in the Nordic-Baltic countries and reciprocated levels

Bank from → Operates in: ↓	DK	EE	FI	IS	LV	LT	NO	SE
DK	7.0	0	7.0	0		7.0	0	7.0
EE								
FI								
IS								
LV								
LT	0	2.0	0	0	2.0	2.0	2.0	2.0
NO								
SE								

Note: For **Denmark** – the sector specific SyRB is set on exposures to real estate companies. Exposures within the loan-to-value (LTV) range of 0 and 30 per cent are exempt. For **Lithuania** - sector specific SyRB is set on retail exposures to resident natural persons secured by residential real estate. For the three largest Swedish banks, the sector specific buffers in Denmark and Lithuania respectively, apply in addition to the Swedish systemic risk buffer of 3.0 per cent. **Reciprocation**: Denmark has requested reciprocity for institutions with relevant exposures exceeding EUR 200 million. Lithuania has requested reciprocity for institutions with relevant exposures exceeding EUR 50 million. "0" indicates that the buffer has not been reciprocated and the relevant exposures of domestic banks are below the applicable materiality threshold, but "empty cells" indicates that no reciprocity was asked or such measure (sectoral SyRB) does not exist.

Source: National authorities.

Sample and data definitions

	Data definition
Institution-specific CCyB	The calculation of institution-specific CCyB is demonstrated in the example provided by the EBA Q&A (ID 2016_3055). This ensures that the buffer applies consistently at both the highest level of consolidation (covering subsidiaries, branches and direct cross-border activities of the group) and at the individual institution level, in accordance with the CRD provisions.
CET1 requirement from Pillar 2	Under the CRD V, the Pillar 2 capital requirement should have the same composition as Pillar 1, i.e. at least 56.25 per cent should be in CET1 and at least 75 per cent should be in Tier 1 capital as a minimum requirement. The competent authority may require the institution to meet its additional own-funds requirement with a higher portion of Tier 1 capital, or Common Equity Tier 1 capital, where necessary
Capital requirements	The requirements include requirements resulting from the reciprocation of foreign measures, not only requirements originating in the domestic country. The country numbers reflect weighted averages across banks.
	Sample of banks covered
Chart 1, Chart 2.a and 2.b	All domestic banks at the highest level of consolidation, including foreign subsidiaries operating in the same jurisdiction. For Latvia data for Swedbank group includes only the local subsidiary Swedbank AS, but not its highest local consolidated level Swedbank Baltics AS to rule out effects resulting from macroprudential capital requirements of other Baltic countries. For Lithuania, Charts 1 and 3 are based on data of banks at the highest consolidation within the country with an adjustment for Revolut, for which the O-SII buffer requirement is formally applicable only at the individual level, but is projected into the consolidated banking sector data.