



# Covered Bond & SSA View

NORD/LB Markets Strategy & Floor Research

**Market overview** 

**Publication overview** 

Contacts at NORD/LB



43

44

# Agenda

Covered Bonds	3
SSA/Public Issuers	6
ESG covered bonds – another record year	8
Current LCR classifications for our SSA coverage	12
ECB tracker	
Asset Purchase Programme (APP)	24
Pandemic Emergency Purchase Programme (PEPP)	29
Aggregated purchase activity under APP and PEPP	32
Charts & Figures	
Covered Bonds	33
SSA/Public Issuers	39
Overview of latest Covered Bond & SSA View editions	42

### Floor analysts:

Covered Bonds/Banks
Dr Frederik Kunze
frederik.kunze@nordlb.de
Melanie Kiene, CIIA
melanie.kiene@nordlb.de
Stefan Rahaus
stefan.rahaus@nordlb.de

SSA/Public Issuers
Dr Norman Rudschuck, CIIA
norman.rudschuck@nordlb.de
Jan-Phillipp Hensing
jan-phillipp.hensing@nordlb.de

NORD/LB:NORD/LB:NORD/LB:Bloomberg:Markets Strategy & Floor ResearchCovered Bond ResearchSSA/Public Issuer ResearchRESP NRDR < GO>



# Market overview Covered Bonds

Authors: Dr. Frederik Kunze // Melanie Keine // Stefan Rahaus

#### Primary market: TLTRO III refinancing or pre-funding?

While four covered bond deals from four jurisdictions were placed on the market at the start of last week, things remained quiet on the primary market over the course of the rest of the week. It was only in the new trading week that the momentum was ratcheted up again significantly. For example, on Monday the German UniCredit Bank and Canadian Federation des Caisses Desjardins du Quebec (CCDJ) each approached investors. UniCredit (Ticker: HVB) raised EUR 750m at ms +2bp, with the bank paying a new issue premium of 3-4bp as a result. The initial guidance was in the area of ms +6bp, with the order book for the mortgage Pfandbrief with a term of just over three years eventually coming to a total volume of EUR 1.1bn. CCDJ also tapped the short-end with its 2y covered bond worth EUR 750m. The bond started out the marketing phase with initial guidance in the area of ms +15bp. From our perspective, the mortgage covered bond from CCDJ complies with the transparency requirements of Art. 14 of the Covered Bond Directive and the issuer has opted to make use of the ECBC Covered Bond Label, meaning we would assume that an LCR level of 2A applies here. The order book for the CCDJ deal ultimately came to EUR 1.25bn, with the result that an issuance volume of EUR 750m produced a bid-to-cover ratio of 1.7x. The final spread came in at ms +12bp. Bankinter (ticker: BKTSM; last issuance activity dates back to 2018) become the fourth issuer from Spain to venture onto the market in 2022, raising the issuance volume from this jurisdiction to EUR 5.75bn in the current year. Its soft bullet covered bond with a term to maturity of 5.5 years was eventually issued at ms +40bp (volume: EUR 750m; order book: EUR 900m; guidance: ms +40bp area). With the total volume of covered bonds issued in 2022 now standing at EUR 194.4bn, a new record high has already been achieved. The previous highest value of EUR 152.4bn was recorded in 2011. The adjusted TLTRO III conditions and the additional voluntary repayment dates directly related to this certainly have the potential to provide fresh impetus on the primary market. Nevertheless, at EUR 292bn, the voluntary repayment volume communicated by the Eurosystem for the first of the three deadlines was lower than anticipated (Bloomberg market forecast: EUR 600bn). However, at this point we would not overstate the importance of this "low" figure. After all, there are two further additional dates for voluntary repayments and the largest TLTRO III tender (TLTRO III.4 with a volume of more than EUR 900bn still outstanding after the November repayment) is scheduled to run until June 2023. In addition, some commercial banks might favour holding higher levels of liquidity up to the end of the year. Therefore, not all EMU issuers presently approaching investors are to be regarded as "TLTRO III re-financiers". We also see significant incentives for prefunding activities on account of the uncertainty surrounding funding costs in 2023 alone, in addition to a potential quantitative tightening course on the part of the ECB.

Issuer	Country	Timing	ISIN	Maturity	Size	Spread	Rating	ESG
Bankinter SA	ES	22.11.	ES0413679525	5.5y	0.75bn	ms +40bp	-/Aa1/AA+	-
CCDJ	CA	21.11.	XS2560673662	2.0y	0.75bn	ms +12bp	AAA / Aaa / -	-
UniCredit Bank	DE	21.11.	DE000HV2AY79	3.3y	0.75bn	ms +2bp	- / Aaa / -	-

 $Source: Bloomberg, NORD/LB\ Markets\ Strategy\ \&\ Floor\ Research,\ (Rating:\ Fitch\ /\ Moody's\ /\ S\&P)$ 



# Secondary market: new issuances and looming year-end suppressing spreads

The secondary market continues to be influenced by events on the primary market and the approaching year-end. Traders are attempting to reduce their books or keep them at a low level, among other reasons due to the seasonally high issuances volumes at the start of a new year. The willingness to snap up fresh supply or to buy positions via secondary market inquiries is correspondingly low, which is suppressing spreads. New deals are increasingly leading to swap requests involving what would appear to be expensive secondary market securities for primary market bonds with a new issue premium, which often applies not only to the respective issuer but rather to the entire jurisdiction or region in question. As we mentioned last week, we do not expect this trend to end until primary market activities start to slow down.

# Deutsche Hypo Real Estate Climate – positive development brings negative spiral to an end?

After having recently recorded double-digit losses, the monthly survey for the <u>Deutsche Hypo Real Estate Climate</u> has shown a positive development again in November. Around 1,200 real estate experts were surveyed for this. Accordingly, the Real Estate Climate increased by 7.1% to 69.4 points in the reporting month of November. It should be noted that both the investment climate (+5.8% to 50.7 points) and the earnings climate (+8.0% to 89.4 points) contributed to this positive development. As a sub-component, the office climate also recorded an improvement in sentiment (+13.0% to 67.4 points), while the retail climate actually registered the sharpest increase of +16.5% to 43.2 points after a significant decline in the previous month. The hotel climate climbed by +6.9% to 71.1 points. The logistics climate is still trending downwards (-1.1%), but remains at the top of the pile with a score of 111.1 points. While the commercial area can therefore boast an overwhelmingly positive trend, this is not the case for residential properties. A sustained loss of trust is in evidence here, resulting in a further decline of 1.1% to 88.6 points for the November survey.

# Scope Ratings: Italian banking sector reports solid Q3 figures

The agency Scope Ratings has taken a closer look at the Q3 business figures recently published by the banks it covers in Italy and certified that they have performed solidly. Scope commented on this as part of a press release issued in mid-November. The higher interest margins following the rise in interest rates are clearly noticeable here, while operating and risk costs are under control despite higher energy costs. Moreover, asset quality remains solid and the banks have healthy capital buffers. According to Scope, the average MDA buffer was 590bp at the end of September 2022, meaning that the banks are currently in a comfortable position. The average return on equity of the eight banks in the Scope sample (Intesa Sanpaolo, UniCredit, Banco BPM, Banca Monte dei Paschi di Siena, Mediobanca, BPER Banca, Credito Emiliano and Banca Popolare di Sondrio) was 7.1% in the third quarter. The decisive factors behind this impressive performance were the recovery in net interest income, stringent cost management and low risk provisions. Should the macroeconomic environment deteriorate further and lead to a recession, banks would be hit across multiple levels (credit, fees, commission, risk costs), depressing the financial results in the process. On Monday, the Italian banking sector was once again the focus of Scope's attention, with all eyes on the market for NPLs on this occasion. In August and September, for example, 58% more securitisations took place. According to information from the Italian bank itself, Intesa Sanpaolo has registered around EUR 13bn in funds from the ECB's longterm tender (TLTRO) for repayment. According to a Bloomberg survey, the market expects repayments totalling EUR 296.3bn after the ECB adjusted the conditions. Intesa will then be responsible for around 15% of the total expected repayments.



#### **DBRS comments on Spanish Covered Bond Act**

The rating agency DBRS has discussed the implementation of the Covered Bond Directive in Spanish law as part of a recent comment piece. According to the agency, the lower overcollateralisation ratios, a higher share of private mortgage loans with lower loan-to-value ratios and the elimination of the majority of loans in arrears can be ranked among the most important changes for cover pools. Even if the overcollateralisation ratios resulting from the change in the law are lower (previously the entire mortgage book [excluding securitised assets] was credited to the cover pool), the positive changes outweigh the negative ones, DBRS writes. These include, for example, the inclusion of a dynamic liquidity buffer, appointment of an independent adjudicator to monitor the cover pool and increased transparency. Another new feature is that a new cover pool has to be formed for each programme and the criteria for eligible cover assets are stricter than in the past. As a result, the cover pools and overcollateralisation ratios in Spain have changed significantly. In contrast, seasoning and geographical distribution have remained relatively unchanged according to DBRS. This is because the change in the law does not directly impact these aspects. We will analyse the Spanish covered bond market in greater detail as part of an upcoming edition of our weekly publication.



# Market overview SSA/Public Issuers

Authors: Jan-Phillipp Hensing // Dr. Norman Rudschuck, CIIA

#### Lower Saxony (ticker: NIESA) preparing supplementary budget

One week after taking office, the federal state government of Niedersachsen has concluded a draft supplementary budget for 2022 and 2023. This lays the budgetary groundwork for a relief package to support citizens, companies, municipalities and social institutions facing cost increases in the energy sector in the wake of Russia's war on Ukraine. As announced ahead of the state elections, the supplementary budget comprises an "immediate" programme worth EUR 970m. It includes a hardship fund with a volume of EUR 55m to prevent citizens who are especially affected by the sharp energy price rises being cut off from electricity or gas. A total of EUR 200m of the immediate package is earmarked for children's nurseries and schools as well as a further EUR 200m for small and medium-sized enterprises (SMEs). Alongside the immediate programme, an additional EUR 707m is being made available for the energy transition. This will help promote independence from Russian gas. In particular, it secures the financing of the LNG terminal in Stade and enables the co-financing of hydrogen projects. Overall, EUR 302m is allotted to provide accommodation and care for refugees. Russia's war of aggression has already led to more than 100,000 people from Ukraine coming to Lower Saxony and further Ukrainians in need of protection are to be expected in the cold winter months ahead. This is exacerbated by the inflow of refugees from other crisis regions of the world. The provided funds are to be used for housing those in need. Municipalities will receive an additional EUR 264m this year and EUR 265m next year as part of the municipal financial equalisation. Overall, the direct relief for municipalities from the supplementary package amounts to around EUR 1.1bn. Niedersachsen's Ministry of Finance estimates the additional indirect relief totals approximately EUR 1bn. Similar to the Bund, which paid an energy lump sum of EUR 300 to pensioners and the federal government's pension recipients, the supplementary budget provides for an equivalent transfer to pension recipients of the federal state and municipalities. Taking into account cyclical adjustment, EUR 394m is earmarked for additional costs such as the increase in housing benefit, the federal state's higher energy costs and interest charges. In total, additional funds from the supplementary budget amount to EUR 2.9bn and reciprocal financing is essentially to be provided through tax revenue in accordance with the last autumn tax estimate. The draft could be adopted as early as 30 November 2022, as the state government will ask the state parliament for immediate committee referral.



#### KfW climate barometer: one in four companies investing in climate protection

With the KfW climate barometer, KfW Research has created a new company survey that provides a representative database detailing the investment behaviour of all German companies as they work towards achieving climate neutrality. According to the survey, companies spent EUR 55bn on climate protection in 2021. Half of this was accounted for by SMEs (max. annual turnover of EUR 500m) and large companies. "Of the EUR 433bn invested by the German corporate sector overall last year, one in every eight euros went towards energy transition projects", explained Dr Fritzi Köhler-Geib, KfW Chief Economist. However, in order to achieve climate neutrality in Germany by the middle of the century, total investment of EUR 5tn is needed, which equates to average annual investment of around EUR 190bn. For the current year, companies were largely expecting stable climate protection investments in the first half of 2022. In the survey period between February and June 2022, 77% of those who were already active in this respect stated that they were planning to maintain the current level of investment, while 18% had planned to increase their investment. The current energy crisis has generated two opposing effects: on the one hand, the high fossil fuel prices provide a greater incentive for switching to renewable energies and consequently improving energy efficiency. On the other, the high level of uncertainty about the economic consequences of this crisis is contributing to investment projects being postponed. Another finding of the KfW climate barometer is that only 10% of companies are so far aiming for climate neutrality.

#### **Primary market**

As is usual at this time of the year, new issues are very few and far between. In our last issue, we highlighted the mandate from Svensk Exportkredit (ticker: SEK) and it did not take long for the issuance to appear on our screens: a total of EUR 1bn was raised with a maturity of a little over five years. The guidance started at ms +17bp area but narrowed by 1bp in the marketing phase to ms +16bp. The order book amounted to more than EUR 1.25bn. Next on the market was the federal state of Thuringia (ticker: THRGN). This deal featured a volume of EUR 250m (WNG) – i.e. falling short of benchmark format and so not included in the table below – and a maturity of ten years. Marketing started with a guidance of ms -9bp area, with no narrowing subsequently observed. No details were disclosed regarding the volume of the order book. This was followed by a bond from Norway's Kommunalbanken (ticker: KBN). A total of EUR 1.0bn changed hands at ms +10bp for this five-year deal. Compared to the guidance, the spread narrowed by 1bp. The order book had a volume of EUR 1.2bn, resulting in a bid-to-cover ratio of 1.2x. Finally, we would like to draw your attention to the upcoming EU auction on Monday. According to the EU's funding plan, this will be the last auction of the year.

Issuer	Country	Timing	ISIN	Maturity	Size	Spread	Rating	ESG
KBN	Nordics	21.11.	XS2560994035	5.0y	1.00bn	ms +10bp	- / Aaa / AAA	-
SEK	Nordics	15.11.	XS2559401802	5.3y	1.00bn	ms +16bp	-/-/-	-

Source: Bloomberg, NORD/LB Markets Strategy & Floor Research (Rating: Fitch / Moody's / S&P)



# Covered Bonds – another record year

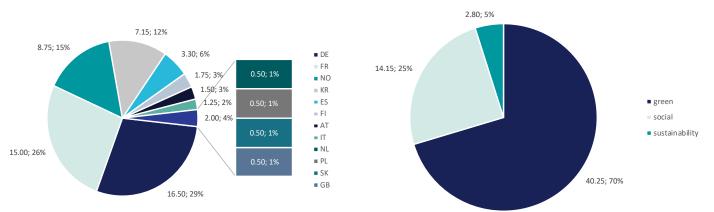
Author: Melanie Kiene, CIIA

#### The market for ESG covered bonds

The matter of environmental, social and governance (ESG) has become a key component of the international bond market and is here to stay. Across almost the entire spectrum of active jurisdictions and in the most important currencies, bonds can be placed in green, social or generally sustainable formats. In our NORD/LB Fixed Income Special - ESG update in March this year, we focused on this trend in great detail. Today, we will take a look at the ESG subsegment of EUR benchmark covered bonds. In a global context, green bonds accounted for the bulk of the total sustainable bonds outstanding worldwide at the end of 2021, with a share of 50%. Both the fundamental dynamics of the ESG segment and the preponderance of green bonds can be attributed to the market for sustainable covered bonds. Based on the data in the ECBC Factbook 2022, the volume of ESG covered bonds outstanding (sustainable covered bonds) amounted to EUR 53.4bn as at year-end 2021. In relation to covered bonds with an outstanding volume of EUR ≥250m, around 31% of asset allocation is attributable to social assets and 69% to green assets. Of this 69%, 75% in turn is made up of green mortgages (residential) or buildings, while 17% of assets are attributable to commercial buildings. With regard to the EUR benchmark segment - one we regularly reflect on – we last provided an overview of the whole ESG bond market in March 2022 in our NORD/LB Fixed Income Special - ESG update and the active covered bond issuers in the NORD/LB Covered Bond & SSA View 12/2022. We also focused on the submarket in special editions of The Covered Bond Report and the BondGuide. In today's edition of our weekly publication, we present the market and issuances of EUR benchmarks in an ESG format this year and provide an updated overview of currently active issuers in green, social and sustainability covered bonds.

# ESG covered bonds by country (EUR BMK; EUR bn)

#### ESG covered bonds by type (EUR BMK; EUR bn)





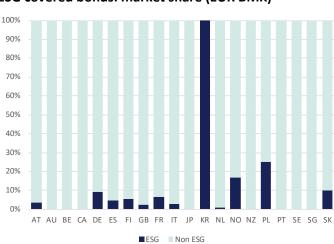
#### **EUR benchmarks in ESG format**

The outstanding volume of EUR benchmarks totals around EUR 968.0bn, of which EUR 57.2bn is covered bonds in ESG format. This volume is split between 80 outstanding bonds in total. The largest market shares are accounted for by Germany (EUR 16.5bn; 26 bonds) and France (EUR 15.0bn; 15 bonds). The 12 active jurisdictions now include Norway (EUR 8.8bn; 11 bonds) and South Korea (EUR 7.2bn; 12 bonds). A special feature worth noting in relation to South Korean issuers is that this market has an extremely high preponderance of ESG bonds, mainly due to the public mandate of the Korea Housing Finance Corporation (KHFC). Currently, the EUR benchmark segment in South Korea consists of ESG covered bonds alone. In terms of ESG type, bonds in a green format dominate (EUR 40.3bn; 54 bonds). Social covered bonds account for EUR 14.2bn (21 bonds), while the sustainability category makes up EUR 2.8bn (5 bonds).

#### **ESG** covered bond issuances (EUR BMK)

#### 20 18 SK ■ PL 16 ■ NL 12 ■ KR EURbn 10 ■ GB 6 ■ FI ES ■ DE 0 2016 2017 2018 2019 2020 2021 2022 2015

#### **ESG** covered bonds: market share (EUR BMK)



Source: Market data, Bloomberg, NORD/LB Markets Strategy & Floor Research

#### Market developments over the last few months

Looking back on the past few years, it can unequivocally be said that the current year, 2022, is set to be a record year in terms of new issue volume. A noteworthy volume of EUR 18.1bn has already been placed in 2022 (green: EUR 14.8bn; social: EUR 2.9bn; sustainability: 0.5bn). This means the previous record of EUR 16.3bn set in 2021 has already been exceeded. In 2022, there have also been seven newcomers to the market, with one issuer making an inaugural appearance twice. The first from BayernLB (DE) was its inaugural railway green bond, later followed by its first green mortgage bond placement. Also from Germany, Berlin Hyp appeared on the market for the first time with its inaugural social covered bond and DZ HYP with its green covered bond. Furthermore, we saw inaugural green covered bonds from Banco BMP (IT), Caja Rural de Navarra (ES), UniCredit Bank Austria (AT) and PKO Bank Hipoteczny (PL; PKO). The aforementioned PKO bond was also the first green bond from Poland. This has not only broadened the circle of issuers in itself, but also that of jurisdictions represented in the ESG market.



#### ESG covered bonds in benchmark format: 36 active issuers

The EUR benchmark segment therefore has 36 active ESG issuers, with 80 bonds outstanding overall. Some issuers are active in more than one subsegment: Berlin Hyp (green and social), Caja Rural de Navarra (sustainability and green), CAFFIL (social and green), Credit Agricole Home Loan SFH (social and green) and Kookmin Bank (sustainability and green). As previously highlighted in our commentary in March 2022, the ICMA Principles are currently the main framework for the ESG market and covered bonds.

#### **Emittenten von EUR-Benchmarks im ESG-Format**

Issuer	Country	ESG Type	Volume (in EURbn)	No. of ESG BMKs	Framework based on ICMA principles
BAWAG PSK	AT	green	0.50	1	YES ( <u>Link</u> )
Hypo Tirol Bank	AT	social	0.50	1	YES (Link)
UniCredit Bank Austria	AT	green	0.50	1	YES ( <u>Link</u> )
BayernLB	DE	green	1.00	2	YES ( <u>Link</u> )
Paulin III in A.C.	DE	green	4.00	7	VEC (Link)
Berlin Hyp AG	DE	social	0.75	1	YES ( <u>Link</u> )
Deutsche Kreditbank	DE	social	1.50	3	YES ( <u>Link</u> )
DZ HYP	DE	green	1.00	1	YES ( <u>Link</u> )
ING-DiBa AG	DE	green	2.25	2	YES ( <u>Link</u> )
LBBW	DE	green	1.50	2	YES ( <u>Link</u> )
Münchener Hyp	DE	green	1.50	2	YES ( <u>Link</u> )
NORD/LB	DE	green	2.00	4	YES ( <u>Link</u> )
UniCredit Bank	DE	green	1.00	2	YES ( <u>Link</u> )
Caia Dural da Mayarra	ГC	green	0.50	1	VEC (Link)
Caja Rural de Navarra	ES	sustainable	1.10	2	YES ( <u>Link</u> )
Eurocaja Rural	ES	sustainable	0.70	1	YES ( <u>Link</u> )
Kutxabank	ES	social	1.00	1	YES ( <u>Link</u> )
OP Mortgage Bank	FI	green	1.75	2	YES ( <u>Link</u> )
Yorkshire Building Society	GB	social	0.50	1	YES ( <u>Link</u> )
BPCE SFH	FR	green	3.75	3	YES ( <u>Link</u> )
CAFFIL	ED.	green	1.50	2	VEC (Link)
CAFFIL	FR	social	3.25	4	YES ( <u>Link</u> )
Cradit Agricala Hama Laan CEH	FR	green	1.25	1	VEC (Link)
Credit Agricole Home Loan SFH	FK	social	1.00	1	YES ( <u>Link</u> )
La Banque Postale Home Loan SFH	FR	green	0.75	1	YES ( <u>Link</u> )
Societe Generale SFH	FR	green	3.50	3	YES ( <u>Link</u> )
Banco BPM SpA	IT	green	0.75	1	YES ( <u>Link</u> )
Credit Agricole Italia SpA	IT	green	0.50	1	YES ( <u>Link</u> )
Hana Bank	KR	social	0.50	1	YES ( <u>Link</u> )
Kookmin Bank	KR	green	0.50	1	VEC (Link)
KOOKIIIII Barik	KK	sustainable	1.00	2	YES ( <u>Link</u> )
Korea Housing Finance Corp	KR	social	5.15	8	YES ( <u>Link</u> )
NN Bank	NL	green	0.50	1	YES ( <u>Link</u> )
DNB Boligkreditt	NO	green	3.00	2	YES ( <u>Link</u> )
Eika Boligkreditt	NO	green	1.00	2	YES ( <u>Link</u> )
SpareBank 1 Boligkreditt	NO	green	2.00	2	YES ( <u>Link</u> )
Sparebanken Soer Boligkreditt	NO	green	1.00	2	YES ( <u>Link</u> )
Sparebanken Vest Boligkreditt	NO	green	1.25	2	YES ( <u>Link</u> )
SR-Boligkreditt	NO	green	0.50	1	YES ( <u>Link</u> )
PKO Bank Hipoteczny	PL	green	0.50	1	YES ( <u>Link</u> )
Slovenska Sporitelna	SK	green	0.50	1	YES ( <u>Link</u> )



#### **Further update to the ICMA Green Bond Principles**

The Green Bond Principles (GBP), which are a collection of voluntary frameworks that seek to support issuers in structuring bonds and possible assets, continue to apply unchanged from the June 2021 version (cf. aforementioned <a href="Fixed Income Special">Fixed Income Special</a>). Updates this year only related to the appendix. These essentially clarified the distinction between "Standard Green Use of Proceeds Bonds" (unsecured bonds) and "Secured Green Bonds", in addition to providing further guidance on green Pfandbriefe, securitisations, asset-backed commercial paper, collateralised debt obligations and other secured structures. The GBP are available in <a href="English">English</a>, <a href="German">German</a> and 25 other languages.

#### Conclusion

The global goal of reducing greenhouse gases which damage the climate and the energy crisis triggered by the war in Ukraine are just some of the drivers helping to maintain global momentum in the ESG market and also in the covered bond sub-market. Here, too, the preponderance of green bonds is in evidence, although issuers are also making use of the other two sub-markets. Although there have been seven newcomers to this market so far this year (with BayernLB approaching investors with both a green and a railway covered bond), the number of inaugural placements in 2022 is actually down by four versus 2021. We have already welcomed a number of inaugural placements in recent years and still see notable potential for this momentum to continue. Depending on general market conditions, we therefore expect new issuers to appear next year as well. In our view, the ESG market for covered bonds will continue to grow and develop, in terms of jurisdiction, issuers and ESG type. While the green curve of issuers such as Berlin Hyp is already substantial, some issuers have only appeared on the market once or twice in an ESG format. It is therefore not unlikely that the "social" ESG type will also gain some momentum. In addition, enormous issuing potential can be ascertained just looking at the shares of ESG issues in the total EUR benchmark volume at jurisdiction level. However, in order for this to be fully exploited, issuers must also further develop their own frameworks and conditions. The requirements in the course of the EU taxonomy are certainly to be regarded as setting the course for the market and should not be ignored for covered bonds in ESG format.



# SSA/Public Issuers Current LCR classifications for our SSA coverage

Authors: Dr Norman Rudschuck, CIIA // Jan-Phillipp Hensing

#### Objective of the LCR: reduction in liquidity risks for credit institutions

The objective of the LCR is to control the liquidity risk of a credit institution in such a way that sufficient High-Quality Liquid Assets (HQLA) are available at all times in order to survive a significant stress scenario lasting 30 days. It comprises the minimum liquidity buffer, which is required in order to bridge liquidity mismatches of one month in crisis situations. Specifically, the LCR is calculated from the ratio of HQLA to the net payment outflows in the 30-day stress scenario, whereby this ratio must be at least 100%.

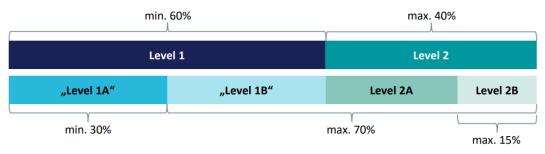
#### 10 October 2014: European Commission publishes LCR Regulation

After there had been a lack of clarity for a long time about the precise definition of HQLA, as well as the EBA recommendation published at the end of 2013 only leading to further uncertainty, the Liquidity Coverage Requirement Delegated Act was finally published on 10 October 2014. This LCR legal act specified in particular which assets are to be treated as HQLA in future. A revised version of the LCR Regulation first published in July 2018 took effect from 30 April 2020. This governs the regulation concerning assets from third countries, repo transactions, CIU shares and stocks. An update was also issued on 8 July 2022, which resolved clashes between the specific liquidity requirements for covered bonds and the existing general liquidity requirements of the CRR.

#### **Categorisation in different liquidity levels**

Under the HQLA definition, the legislation, as proposed by the BCBS, divides HQLA into different liquidity levels. Depending on the assigned level, this results in upper and lower limits for certain levels and the application of possible haircuts. On the following two pages we provide a brief overview of asset classification and allocation, before analysing the implications for SSAs. Please note, however, that in market practice, however, a distinction is occasionally made within Level 1 between Level 1A and Level 1B assets (Level 1 covered bonds due to obligatory haircut), even if such a linguistic distinction appears neither in the CRR nor the LCR Regulation.

#### Structure of the LCR portfolio (Art. 17 LCR Regulation)



Source: LCR Regulation, NORD/LB Markets Strategy & Floor Research



### **Classification overview**

	Leve	1 assets (Art. 10 LCR Regulation)	Minimum haircut (for shares or units in CIUs)
(a)	Coins	and bank notes	- (-)
(b)	Follov	ving exposures to central banks:	- (-)
	(i)	Assets representing claims on or guaranteed by the ECB or an EEA member state's central bank	
	(ii)	Assets representing claims on or guaranteed by central banks of third countries (CQS 1)	
	(iii)	Reserves held by the credit institution in a central bank referred to in (i) and (ii) provided that the credit institution is permitted to withdraw such reserves at any time during stress periods and the conditions for such withdrawal have been specified in an agreement between the relevant competent authority and the ECB or the central bank	
(c)		s representing claims on or guaranteed by the following central or regional governments, local authorities or exector entities:	- (5%)
	(i)	Central governments of an EEA member state	
	(ii)	Central government of a third country (CQS 1)	
	(iii)	Regional governments or local authorities and PSEs in an EEA member state, provided that they are treated as exposures to the central government of the respective EEA member state (i.e., risk weighting of 0%)	
	(iv)	Regional governments or local authorities in a third country of the type referred to in (ii), provided that they are treated as exposures to the central government of the third country (i.e., same risk weighting as central government [0%])	
	(v)	PSEs provided that they are treated as exposures to the central government of an EEA member state or to one of the regional governments or local authorities referred to in (iii) (i.e., same risk weighting of 0%).	
d)	Follov	ving assets:	- (5%)
	(i)	Assets representing claims on or guaranteed by the central government or the central bank of a third country that has not been assigned a CQS 1 (rating below AA-)	
	(ii)	Reserves held by the credit institution in a central bank referred to in i) which meet certain conditions	
e)	Asset	s issued by credit institutions which meet at least one of the following requirements:	- (5%)
	(i)	Incorporated in, or established by the central government of, an EEA member state or the regional government or local authority in an EEA member state, the government or local authority is under the legal obligation to protect the economic basis of the credit institution and maintain its financial viability throughout its lifetime and any exposure to that regional government or local authority, if applicable, is treated as an exposure to the central government (i.e., risk weighting of 0%);	
	(ii)	The credit institution extends promotional loans as defined in Article 10 (1) (e) (ii)	
f)		fying EEA covered bonds which meet all the requirements of Art. 10 (f), including issue size at least EUR 500m uivalent in domestic currency, rating: min. CQS 1 or if no rating a risk weighting of 10% according to Art. 129 RR.	7% (12%)
g)		s representing claims on or guaranteed by multilateral development banks and international organisations 117 (2) and Art. 118 CRR, respectively)	- (5%)



# Classification overview (continued)

	Level 2A assets (Art. 11 LCR Regulation)	Minimum haircut (for shares or units in CIUs)
(a)	Assets representing claims on or guaranteed by regional governments, local authorities or PSEs in an EEA memb state, which are assigned a risk weighting of 20% according to Art. 115 (1) (5) and Art. 116 (1) (2) (3) CRR, respectively	
(b)	Assets representing claims on or guaranteed by the central government or the central bank of a third country or by the regional government, local authority or PSE in a third country, which are assigned a risk weighting of 20% according to Art. 114 (2) or Art. 115, respectively or Art. 116	
(c)	Qualifying EEA covered bonds which meet all the requirements of Art. 11 (c), including issue size at least EUR 250m or equivalent in domestic currency, rating: min. CQS 2 or if no rating a risk weighting of 20% according to Art. 129 (5) CRR.	15% (20%)
(d)	Qualifying covered bonds from third countries which meet all the requirements of Art. 11 (d), including being issued by a credit institution or a 100% subsidiary of a credit institution guaranteeing the issue; issue size at leas EUR 500m or equivalent in domestic currency, rating: min. CQS 1 or if no rating a risk weighting of 10% accordin to Art. 129 (5) CRR.	15% (20%)
	Corporate debt securities which meet all of the following requirements:	
(م)	(i) CQS 1 (minimum rating AA- or equivalent in the case of a short-term credit assessment)	150/ /200/\
e)	(ii) Issue size of at least EUR 250m or equivalent in domestic currency	15% (20%)
	(iii) Maximum time to maturity of the securities at the time of issuance is 10 years	
	Level 2B assets (Art. 12 LCR Regulation)	Minimum haircut (for shares or units in CIUs)
(a)	Exposures in the form of ABS under certain conditions (Art. 13 LCR Regulation)	25-35% (30-40%)
	Corporate debt securities which meet all of the following requirements:	
b)	(i) CQS ≤ 3	50% (55%)
~,	(ii) Issue size of at least EUR 250m or equivalent in domestic currency	30/0 (33/0)
	(iii) Maximum time to maturity of the securities at the time of issuance is 10 years	
c)	Shares or units, provided that they meet certain conditions (Art. 12(1)(c) LCR Regulation)	50% (55%)
d)	Restricted-use committed liquidity facilities provided by the ECB, the central bank of an EEA member state or a third country, under certain conditions (Art. 14 LCR Regulation)	- (-)
(e)	Qualifying EEA covered bonds which meet the requirements of Art. 12 (1) (e) LCR Regulation	30% (35%)
(f) NB: (	Only for religiously observant credit institutions: certain non-interest bearing assets  CQS = Credit Quality Step (rating class) as defined in CSA	50% (55%)

NB: CQS = Credit Quality Step (rating class) as defined in CSA Source: LCR Regulation, NORD/LB Markets Strategy & Floor Research



#### Classified as credit Level 1 asset No haircut LCR Art. 35 By a sovereign EEA member state Not eligible Exception (e)(i) COS 1 Level 1 asset No haircut Level 1 asset No haircut CQS 2 Exception (d) Level 2A asset 15% haircut Level 1 asset CQS > 2 Exception (d) Not eligible 0% RW Level 1 asset No haircut 20% RW Level 2A asset 15% haircut By a sub-sovereign EEA member state Not eligible 0% RW By a PSE Sub-Sovereign Level 1 asset No haircut 20% RW Level 2A asset 15% haircut Exception (d) Level 1 asset No haircut by central government or central bank Level 2B asset 50% haircut Not eligible Level 1 asset No haircut By a supranational Explicitly 117(2) and 118 CRR Not eligible guaranteed Level 1 asset No haircut Classified as. Exception (e)(i) Not eligible Credit institution Level 1 asset No haircut Exception (e)(ii) Not eligible Issue size ≥ EUR 250m Level 2A asset 15% haircut CQS 1 and time to maturity ≤ 10y Not eligible Issue size ≥ EUR 250m Level 2B asset 50% haircut Corporate CQS 2 or 3 Not eligible CQS > 3 Not eligible 0% RW Level 1 asset No haircut 20% RW 15% haircut Level 2A asset Not eligible Sub-Sovereign EEA member state PSE Not eligible 0% RW PSE Sub-Sovereign Level 1 asset No haircut 20% RW Level 2A asset Level 1 asset No haircut Exception (d) Explicitly guaranteed by central government Higher RW Level 2B asset Not eligible Supranational in Level 1 asset No haircut Supranational 117(2) and 118 CRR Not eligible See classification of Covered

## LCR classification of assets (Articles 10 – 12 LCR Regulation)

NB: stated haircuts do not apply to shares or units in CIUs; PSE = Public Sector Entity; CQS = Credit Quality Step (rating class) as defined in CSA; green = condition met; red = condition not met; grey = tbc

Source: LCR Regulation, NORD/LB Markets Strategy & Floor Research;

#### Classification of sovereigns

Bonds from EEA states or bonds from issuers that are explicitly secured by EEA states are classified as Level 1 assets for the purposes of LCR, unless they are classified as a credit institution. For EEA issuers classified as credit institutions, classification as Level 1 assets is possible provided Article 35 of LCR Regulation or Article 10 (1) e of LCR Regulation is applicable. Further restrictions apply to non-EEA states. Bonds issued by non-EEA sovereigns have to be rated at least AA-/Aa3 to be eligible as Level 1 assets. Government bonds qualify for a Level 2A classification if a risk weighting of 20% according to the CRR standardised approach can be applied, i.e., if they have a rating of at least A-/A3.



#### **Exemption Art. 10 (1) (d) LCR Regulation**

However, an exemption is provided for ratings lower than AA-/Aa3 through point (d). Consequently, bonds of corresponding non-EEA states can be declared a Level 1 asset by a credit institution to cover liquidity outflows incurred in the same currency in which the bond is denominated. However, the eligibility as a Level 1 asset is limited to the extent of the calculated net liquidity outflows in periods of stress. If the currency of the bond in question does not correspond to the domestic currency of the relevant country, credit institutions can only classify the bond as a Level 1 asset to a certain extent, namely up to the amount of the credit institution's stressed net liquidity outflows in that foreign currency corresponding to its operations in the jurisdiction where the liquidity risk is being taken. Exemption (d) also applies to bonds that are guaranteed by countries with ratings lower than AA-/Aa3.

# Exemption Article 10 (1) (e) LCR Regulation

Article 10 (1) (e) of the LCR Regulation makes it possible to classify bonds issued by credit institutions as Level 1 assets. Bank securities are otherwise not regarded as liquid assets, apart from certain covered bonds. This is subject to the condition that exposures to the respective regional governments or local authorities (RGLAs; referred to below as subsovereigns) can be treated as exposures to the relevant central government. This condition stipulates that a risk weighting of 0% can be applied under the CRR standardised approach.

(i)

This exemption relates to credit institutions established by the central government or a sub-sovereign of an EEA member state, or which have their registered office in an EEA state, and for which a corresponding guarantee also exists. If the central government or the sub-sovereign(s) is/are consequently legally obliged to protect the economic basis and to maintain its financial viability throughout its lifetime, bonds of these financial institutions can be classified as Level 1 assets.

(ii)

This exemption relates to financial institutions that are promotional lenders. These fulfil three criteria:

- Purpose is to advance public policy objectives of the EU, an EEA central government or an EEA sub-sovereign
- Provision of promotional loans on a non-competitive, not-for-profit basis
- At least 90% of loans granted are directly or indirectly guaranteed by the central government or (a) sub-sovereign(s)



#### **Explicitly guaranteed bank bonds**

Under Article 35 of the LCR, bonds from credit institutions with a guarantee from an EEA central government also qualify as Level 1 assets. At a glance, the conditions are as follows:

- 1. Guarantee through an EEA member state, assuming the guarantee was awarded prior to 30 June 2014 for a maximum amount, and the guarantee is direct, explicit, irrevocable and unconditional, and covers payments of interest and principal.
- 2. If the guarantor is a sub-sovereign of an EEA member state, a 0% risk weighting shall apply and guarantee conditions as per 1. must be met.
- 3. As long as there is a guarantee, a Level 1 classification is possible. If the guarantee amount is increased after 30 June 2014, the respective bonds are eligible for inclusion only up to the maximum guarantee amount in place prior to 30 June 2014.
- 4. Bank bonds with an explicit guarantee are treated just like any other state-guaranteed assets in the context of the LCR.
- 5. If there is a guarantee mechanism in place for a credit institution or its bonds, the mechanism as a whole shall apply for the purposes of this article.

#### SSAs: classification depends on several factors

The classification for SSAs has turned out to be relatively complex, as it depends on several steps. If a guarantee is given for an SSA or its bonds, the liquidity category is based on the classification of the guarantor. For agencies with an explicit guarantee from an EEA member state, this means, for example, that they are assigned to Level 1. If no guarantee is given, classification is more complex in that different classifications apply depending on whether the SSA is in regulatory terms a sub-sovereign, public sector entity (PSE), supranational or corporate. The exemptions described above apply.

#### Classification of supranationals

The classification of supranationals is the simplest of all the SSAs in that claims on or guaranteed by supranationals listed in Articles 117 (2) and 118 CRR are assigned to Level 1. Through Article 118 (f) they also include financial institutions that were established by at least two EEA member states and whose purpose it is to mobilise funding and provide financial assistance to the benefit of its members that are experiencing or threatened by severe financial problems. If a supranational does not meet this criterion and/or is not mentioned in the two CRR articles, bonds of these institutions may not be classified as either Level 1 or Level 2 assets. We think that this will directly affect EUROFIMA and the South American CAF, for example, as their bonds cannot therefore be classified as liquid assets.



# LCR classification of assets representing claims on or guaranteed by supranationals: Level 1 issuers

Issuer (Bloomberg ticker)	CRR-Article
International Bank for Reconstruction and Development (IBRD)	Art. 117(2)a
International Finance Corporation (IFC)	Art. 117(2)b
Inter-American Development Bank (IADB)	Art. 117(2)c
Asian Development Bank (ASIA)	Art. 117(2)d
African Development Bank (AFDB)	Art. 117(2)e
Council of Europe Development Bank (COE)	Art. 117(2)f
Nordic Investment Bank (NIB)	Art. 117(2)g
Caribbean Development Bank (CARDEV)	Art. 117(2)h
European Bank for Reconstruction and Development (EBRD)	Art. 117(2)i
European Investment Bank (EIB)	Art. 117(2)j
European Investment Fund	Art. 117(2)k
Multilateral Investment Guarantee Agency (MULIGA)	Art. 117(2)I
International Finance Facility for Immunisation (IFFIM)	Art. 117(2)m
Islamic Development Bank (ISDB)	Art. 117(2)n
International Development Association	Art. 117(2)o
Asian Infrastructure Investment Bank (AIIB)	Art. 117(2)p
European Union (EU); European Atomic Energy Community (EURAT)	Art. 118 a)
International Monetary Fund	Art. 118 b)
Bank for International Settlements (BIS)	Art. 118 c)
European Financial Stability Facility (EFSF)	Art. 118 d)
European Stability Mechanism (ESM)	Art. 118 e)

Source: CRR, NORD/LB Markets Strategy & Floor Research

### **Classification of PSEs and sub-sovereigns**

The classification of PSEs and sub-sovereigns (regional governments and local authorities; RGLA for short) is almost identical. If an explicit guarantee is given for a bond or an issuer by a central government, classification is the same as for sovereign bonds (see previous pages). If no explicit guarantee is given, classification is carried out primarily on the basis of the issuer's risk weighting. If, in regulatory terms, PSE and sub-sovereign bonds may be treated as exposures to the respective central government and a risk weighting of 0% can be applied, these issuers can accordingly be classified as Level 1. Theoretically, exceptions to this are issuers from outside the EEA where a risk weighting of 0% can be applied but there is no explicit guarantee in place. If it involves a PSE, classification is not possible. Subsovereigns can be classified as a Level 1 asset. Institutions where a risk weighting of 20% can be applied are classified as Level 2A issuers. Institutions with higher risk weightings that are based outside the EAA and have an explicit guarantee from a central bank or government can be classified as Level 1 issuers using the conditions of Exemption (d) (see classification of sovereigns). If an explicit guarantee is not specified, a Level 2B classification as defined in Art. 12 (1) (f) LCR Regulation remains an option. This refers to institutions which, due to their religious beliefs, are not permitted to hold interest-bearing assets. Bonds of other PSEs and sub-sovereigns for which the risk weighting is higher than 20% under the standardised credit risk approach cannot be classified as liquid assets.



#### Interim conclusion for sub-sovereigns and PSEs

The CRR, as the relevant European legislative text, frequently makes a distinction in the treatment of risk positions for sub-sovereigns and PSEs issued within the EU and those issued outside the union. The grounds for this classification are that the supervisory regimes differ greatly in some cases, and less so in others, from the international Basel III regulations or the European requirements. In order to avoid risks due to inadequate supervisory systems, a higher risk weighting is applied to assets issued outside the EU than to comparable positions of EU member state origin. Those states that are regarded as having equal or more stringent supervisory systems are included on a <u>list</u> produced by the European Commission. Now, the country of origin, e.g. New Zealand, will also have to apply risk weighting of 0% to its sub-sovereigns, in order for local investors to also be assigned a risk weighting of 0%. The New Zealand regulator (RBNZ), for instance, does not do this, but instead assigns its sub-sovereigns a risk weighting of 20% (e.g. for Auckland County Council, the country's largest sub-sovereign (ticker: AUCKCN)).

#### PSE definition is gaining in importance

As a result of this classification, the PSE definition, in particular, is gaining in importance within the CRR. The CRR stipulates the basic differentiation, but national supervisory bodies or national laws can define exactly which issuers have to be classified as PSE in the home country. A PSE (public sector entity) is defined in Article 4 (1) (8) of the CRR as:

"A non-commercial administrative body responsible to central governments or regional or local authorities, or to authorities that exercise the same responsibilities as those regional and local authorities, or a non-commercial undertaking that is owned or set up and sponsored by central governments, or regional or local authorities, and that has explicit guarantee arrangements, and may include self-administered bodies governed by law that are under public supervision."

# PSE list provides (some) clarity

In our opinion, the existing definition is too vague. However, the EBA publishes a <u>list</u> of public sector entities whose exposure in relation to Art. 116 CRR is defined as identical to RGLAs. PSEs not on this list must nonetheless continue to be examined individually on the basis of the PSE definition.

#### Level 2 classification possible for non-PSEs

Agencies which are not classified as PSEs and are therefore excluded from this classification path may qualify for Level 2 classification in that if an agency is not a bank, it can be categorised as a Level 2A or Level 2B issuer within the scope of the classification of corporates.

#### **Classification of corporates**

If agencies are classified as corporates in regulatory terms, there are essentially three different restrictions: ratings, issuance volume and term to maturity.



#### Classification of individual issuers

To determine the effects on individual issuers, we implement the LCR classification as detailed on the following pages.

## LCR classification of assets representing claims on or guaranteed by regions\*

Issuer	Current LCR level*
Belgian regions	Level 1
German Bundeslaender	Level 1
French regions	Level 2A
Italian regions	Level 2A
Canadian regions	Level 1
Austrian Bundeslaender	Level 1
Portuguese regions	Level 2A**
Swedish regions	Level 1
Spanish regions	Level 1

<sup>\*</sup>NB: in the absence of an explicit guarantee from the respective nation state, the current LCR level is dependent on the relevant rating (see CQS classification and LCR classification of assets).

Source: NORD/LB Markets Strategy & Floor Research

Source: NORD/LB Markets Strategy & Floor Research

### LCR classification of assets representing claims on or guaranteed by supranationals

Issuer	Bloomberg ticker	Current LCR level
Council of Europe Development Bank	COE	Level 1
European Bank for Reconstruction and Development	EBRD	Level 1
European Financial Stability Facility	EFSF	Level 1
European Investment Bank	EIB	Level 1
European Stability Mechanism	ESM	Level 1
European Union	EU	Level 1
EUROFIMA	EUROF	Not eligible
Nordic Investment Bank	NIB	Level 1
African Development Bank	AFDB	Level 1
Asian Development Bank	ASIA	Level 1
Corporación Andina de Fomento	CAF	Not eligible
International Bank for Reconstruction and Development	IBRD	Level 1
Inter-American Development Bank	IADB	Level 1
International Finance Corporation	IFC	Level 1
Islamic Development Bank	ISDB	Level 1

# Clarity on supranationals, but ambiguity regarding non-explicit guarantees

While there is clarity with regard to the classification of supranationals, this is largely lacking for agencies that do not have an explicit guarantee from a central government or a sub-sovereign. Consequently, the overview on the next page lists our expectations for liquidity level classification.

<sup>\*\*</sup>Exemption: guaranteed bonds from Madeira are classified as Level 1.



# LCR classification of assets representing claims on or guaranteed by agencies

Issuer	Country	Ticker	Haircut	Rationale	Current LCR level
KfW	DE	KFW	-	Art. 10(1)(c)(i): Explicit state guarantee	Level 1
Rentenbank	DE	RENTEN	-	Art. 10(1)(c)(i): Explicit state guarantee	Level 1
FMS-WM	DE	FMSWER	-	Art. $10(1)(c)(v)$ : FMS-WM classified as PSE	Level 1
EAA	DE	ERSTAA	-	Art. 10(1)(c)(v): EAA classified as PSE	Level 1
NRW.BANK	DE	NRWBK	-	Art. 10(1)(c)(iii): Explicit guarantee from regional government	Level 1
L-Bank	DE	LBANK	-	Art. 10(1)(c)(iii): Explicit guarantee from regional government	Level 1
IBB	DE	IBB	-	Art. 10(1)(c)(iii): Explicit guarantee from regional government	Level 1
LfA	DE	BAYLAN	-	Art. 10(1)(c)(iii): Explicit guarantee from regional government	Level 1
BayernLabo	DE	BYLABO	-	Art. 10(1)(c)(iii): Explicit guarantee from regional government	Level 1
WIBank	DE	WIBANK	-	Art. 10(1)(c)(iii): Explicit guarantee from regional government	Level 1
IB.SH	DE	IBBSH	-	Art. 10(1)(c)(iii): Explicit guarantee from regional government	Level 1
IFBHH	DE	IFBHH	-	Art. 10(1)(c)(iii): Explicit guarantee from regional government	Level 1
SAB	DE	SABFOE	-	Art. 10(1)(c)(iii): Explicit guarantee from regional government	Level 1
ILBB	DE	ILBB	-	Art. 10(1)(c)(iii): Explicit guarantee from regional government	Level 1
ISBRLP	DE	ISBRLP	-	Art. 10(1)(c)(iii): Explicit guarantee from regional government	Level 1

<sup>\*</sup> According to classification of Banque de France.

\*\* Applicability of Article 10 (1) (e) (i) confirmed by De Nederlandsche Bank.

\*\*\* Issue volume > EUR 250m; time to maturity < 10 Y

Source: NORD/LB Markets Strategy & Floor Research



# LCR classification of assets representing claims on or guaranteed by agencies (continued)

Issuer	Country	Ticker	Haircut	Rationale	Current LCR level
CADES	FR	CADES	-	Art. 10(1)(c)(i): PSE with risk weighting of 0%*	Level 1
AFD	FR	AGFRNC	-	-	Not eligible
Unédic	FR	UNEDIC	-	Art. 10(1)(c)(i): PSE with risk weighting of 0%*	Level 1
CDC	FR	CDCEPS	-	Art. 10(1)(c)(v): PSE with risk weighting of 0%*	Level 1
Bpifrance	FR	OSEOFI	-	Level 1 classification in line with Art. 10(1)(e)(i)	Level 1
SAGESS	FR	SAGESS	-	Art. 10(1)(c)(i): PSE allocation as ODAC	Level 1
AFL	FR	AFLBNK	15%	Art. 11(1)(b): Explicit guarantee from RGLA with risk weighting of 20%	Level 2A
SFIL	FR	SFILFR	-	Level 1 classification in line with Art. 10(1)(e)(i)	Level 1
SGP	FR	SOGRPR	15%	Art. 11(1)(a): PSE with risk weighting of 20%	Level 2A
3CIF	FR	CCCI	-	Art. 10(1)(c)(i): Explicit state guarantee	Level 1
BNG	NL	BNG	-	Art. 10(1)(e)(ii): Promotional credit institution **	Level 1
NWB	NL	NEDWBK	-	Art. 10(1)(e)(ii): Promotional credit institution **	Level 1
FMO	NL	NEDFIN	-	Art. 10(1)(c)(i): Explicit state guarantee	Level 1
OeKB	AT	ОКВ	-	Art. 10(1)(c)(i): Explicit state guarantee	Level 1
ÖBB- Infrastruktur	АТ	OBND	-	Art. 10(1)(c)(i): Explicit state guarantee	Level 1
ASFINAG	AT	ASFING	-	Art. 10(1)(c)(i): Explicit state guarantee	Level 1

<sup>\*</sup> According to classification of Banque de France.

<sup>\*\*</sup> Applicability of Article 10 (1) (e) (i) confirmed by De Nederlandsche Bank.
\*\*\* Issue volume > EUR 250m; time to maturity < 10 Y

Source: NORD/LB Markets Strategy & Floor Research



# LCR classification of assets representing claims on or guaranteed by agencies (continued)

Issuer	Country	Ticker	Haircut	Rationale	Current LCR level
KBN	NO	KBN	15%	Art. 11(1)(a): PSE with RW of 20%	Level 2A
SEK	SE	SEK	15%	Level 2A classification in line with Art. 11(1)(a)	Level 2A
Kommun- invest	SE	KOMINS	-	Level 1 classification in line with Art. 10(1)(e)(i)	Level 1
MuniFin	FI	KUNTA	-	Art. 10(1)(c)(v): Explicit guarantee via PSE	Level 1
Kommune- Kredit	DK	KOMMUN	-	Art. 10(c)(iv): Explicit guarantee via RGLA with risk weighting of 0%	Level 1
Finnvera	FI	FINNVE	-	Art. 10(1)(c)(i): Explicit state guarantee	Level 1
ICO	ES	ICO	-	Art. 10(1)(c)(i): Explicit state guarantee	Level 1
FADE	ES	FADE	-	Art. 10(1)(c)(i): Explicit state guarantee	Level 1
ADIFAL	ES	CORES	-	Art. 11(1)(a): PSE with RW of 50%	Not eligible
ADIF-AV	ES	CORES	-	Art. 10(1)(c)(v): PSE with risk weighting of 0%	Level 1
CDP	IT	CDEP	-	Not a corporate as RW too high to apply Art. 11(1)(a)	Not eligible
REFER	PT	REFER	-	Art. 10(1)(c)(i): Explicit state guarantee (only guaranteed bonds)	Level 1 (guaranteed bonds)
BGK	PL	BGOSK	-	Art. 10(1)(c)(i): Explicit state guarantee	Level 1
DCL	BE	DEXGRP	-	Art. 10(1)(c)(i): Explicit state guarantee (only guaranteed bonds)	Level 1 (guaranteed bonds)
JFM	JP	JFM	15%	Art. 11(1)(b): Explicit state guarantee (only guaranteed bonds)	Level 2A (guaranteed bonds)
KDB	KR	KDB	15%	Level 2A classification in line with Art. 11(1)(b)	Level 2A
KEXIM	KR	EIBKOR	15%	Level 2A classification in line with Art. 11(1)(b)	Level 2A
DBJ	JP	DBJJP	15%	Art. 11(1)(b) Explicit state guarantee (only guaranteed bonds)	Level 2A (guaranteed bonds)
IBK	KR	INDKOR	15%	Level 2A classification in line with Art. 11(1)(b)	Level 2A
EDC	CA	EDC	-	Art. 11(1)(b) Explicit state guarantee	Level 1
CDB	CN	SDBC	-	Not a corporate as RW too high to apply Art. 11(1)(a)	Not eligible

<sup>\*</sup> According to classification of Banque de France.

\*\* Applicability of Article 10 (1) (e) (i) confirmed by De Nederlandsche Bank.

\*\*\* Issue volume > EUR 250m; time to maturity < 10 Y

Source: NORD/LB Markets Strategy & Floor Research

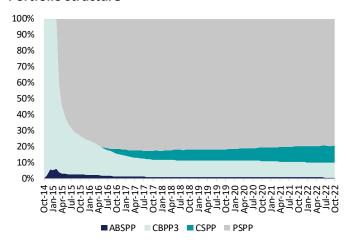


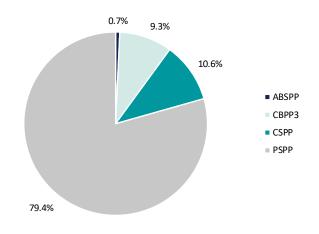
# ECB tracker

#### **Asset Purchase Programme (APP)**

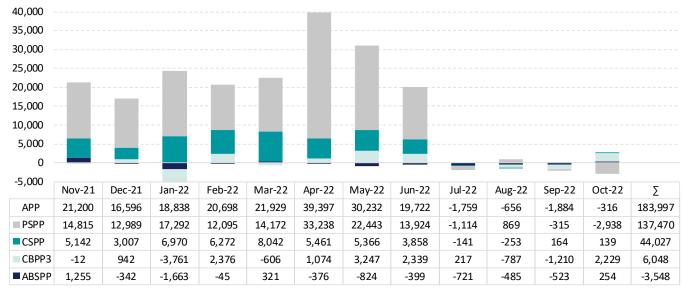
	ABSPP	СВРР3	CSPP	PSPP	APP
Sep-22	23,594	300,157	344,388	2,588,118	3,256,257
Oct-22	23,849	302,385	344,527	2,585,180	3,255,941
Δ	+254	+2,229	+139	-2,938	-316

#### Portfolio structure





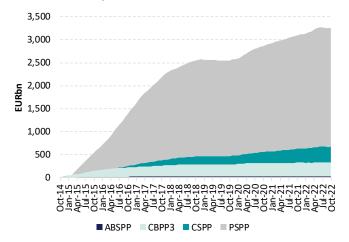
#### Monthly net purchases (in EURm)



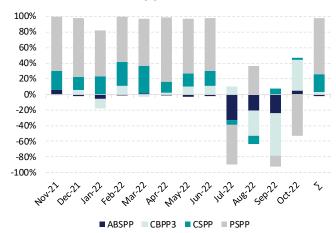
Source: ECB, NORD/LB Markets Strategy & Floor Research



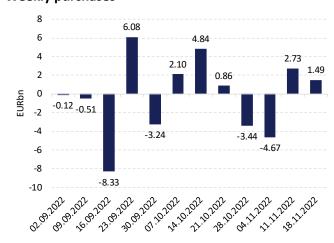
#### Portfolio development



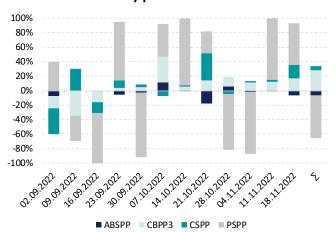
#### Distribution of monthly purchases



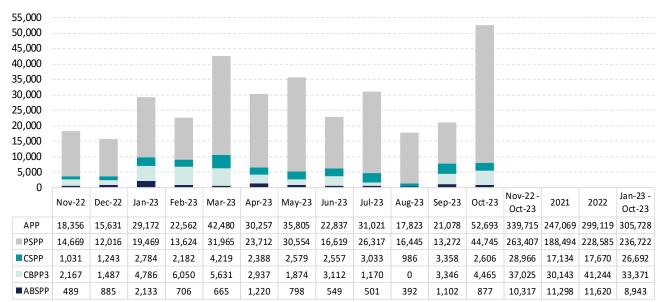
### Weekly purchases



# Distribution of weekly purchases



# **Expected monthly redemptions (in EURm)**

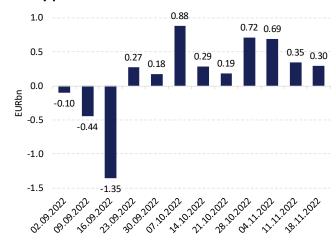


Source: ECB, Bloomberg, NORD/LB Markets Strategy & Floor Research

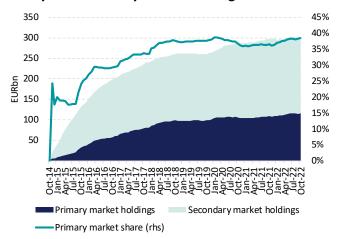


## **Covered Bond Purchase Programme 3 (CBPP3)**

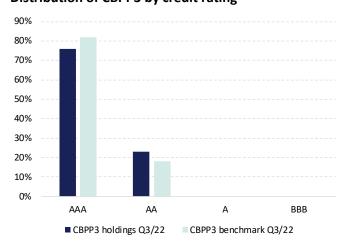
### Weekly purchases



#### Primary and secondary market holdings

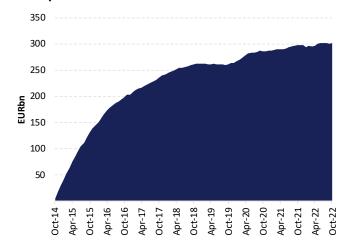


# Distribution of CBPP3 by credit rating



Source: ECB, Bloomberg, NORD/LB Markets Strategy & Floor Research

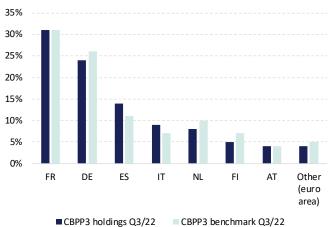
#### **Development of CBPP3 volume**



#### Change of primary and secondary market holdings



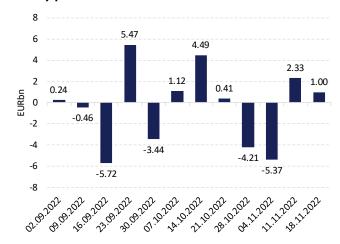
#### Distribution of CBPP3 by country of risk



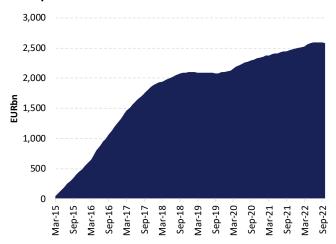


# **Public Sector Purchase Programme (PSPP)**

### Weekly purchases



# **Development of PSPP volume**



### Overall distribution of PSPP buying at month-end

Jurisdiction	Adjusted distribution key <sup>1</sup>	Holdings (EURm)	Expected holdings (EURm) <sup>2</sup>	Difference (EURm)	Current WAM of portfolio <sup>3</sup> (in years)	WAM of eligible universe <sup>4</sup> (in years)	Difference (in years)
AT	2.7%	77,742	74,029	3,713	7.3	8.2	-0.9
BE	3.4%	93,770	92,147	1,623	7.5	10.3	-2.8
CY	0.2%	4,452	5,442	-990	8.6	9.1	-0.5
DE	24.3%	665,502	666,749	-1,247	6.7	8.0	-1.3
EE	0.3%	488	7,125	-6,637	7.7	7.7	0.0
ES	11.0%	315,038	301,604	13,434	7.7	8.2	-0.5
FI	1.7%	43,825	46,459	-2,634	8.2	8.9	-0.7
FR	18.8%	531,880	516,583	15,297	6.7	8.6	-1.9
GR	0.0%	0	0	0	0.0	0.0	0.0
IE	1.6%	42,476	42,830	-354	8.2	10.5	-2.4
IT	15.7%	448,664	429,683	18,981	7.2	7.9	-0.7
LT	0.5%	5,964	14,638	-8,674	10.4	10.2	0.2
LU	0.3%	3,913	8,331	-4,418	5.8	7.8	-2.0
LV	0.4%	3,878	9,855	-5,977	8.9	9.0	-0.1
MT	0.1%	1,423	2,653	-1,230	11.2	9.6	1.6
NL	5.4%	132,873	148,225	-15,352	7.8	9.6	-1.8
PT	2.2%	53,609	59,197	-5,588	7.2	7.5	-0.3
SI	0.4%	11,125	12,178	-1,053	9.4	9.5	-0.1
SK	1.1%	18,494	28,966	-10,472	7.9	8.4	-0.5
SNAT	10.0%	285,655	274,077	11,578	8.1	9.4	-1.4
Total / Avg.	100.0%	2,740,773	2,740,773	0	7.2	8.5	-1.2

<sup>&</sup>lt;sup>1</sup> Based on the ECB capital key, adjusted to include supras and the disqualification of Greece

<sup>&</sup>lt;sup>2</sup> Based on the adjusted distribution key

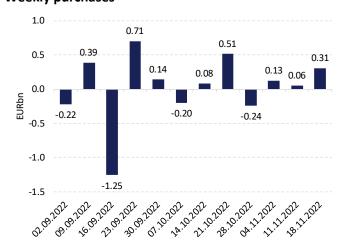
<sup>&</sup>lt;sup>3</sup> Weighted average time to maturity of PSPP portfolio holdings

 $<sup>^4</sup>$  Weighted average time to maturity of the bonds eligible for purchasing under the PSPP Source: ECB, NORD/LB Markets Strategy & Floor Research

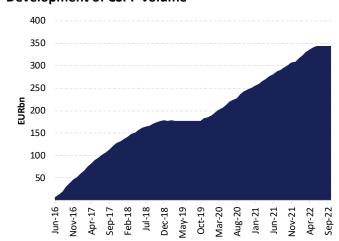


# **Corporate Sector Purchase Programme (CSPP)**

# Weekly purchases

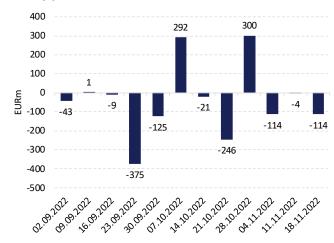


### **Development of CSPP volume**



# **Asset-Backed Securities Purchase Programme (ABSPP)**

### Weekly purchases



Source: ECB, Bloomberg, NORD/LB Markets Strategy & Floor Research

#### **Development of ABSPP volume**



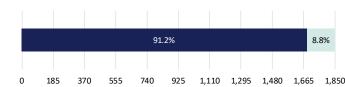


## Pandemic Emergency Purchase Programme (PEPP)

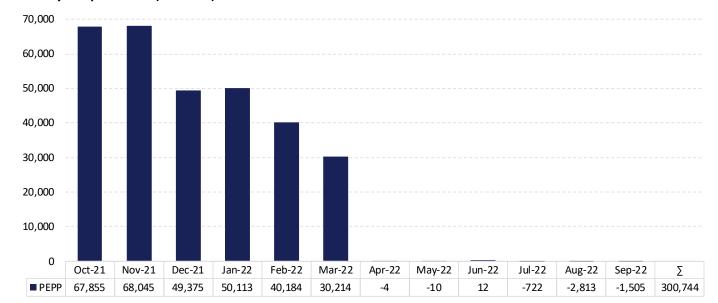
# Holdings (in EURm)

# Invested share of PEPP envelope (in EURbn)

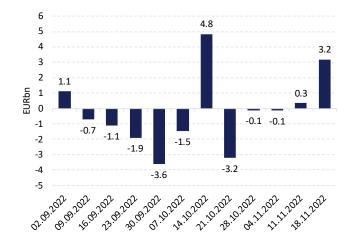
	PEPP
Aug-22	1,714,539
Sep-22	1,713,035
Δ (net purchases)	-1,505



# Monthly net purchases (in EURm)

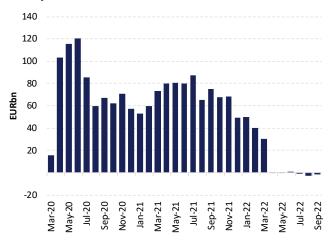


# Weekly purchases



Source: ECB, Bloomberg, NORD/LB Markets Strategy & Floor Research

### **Development of PEPP volume**

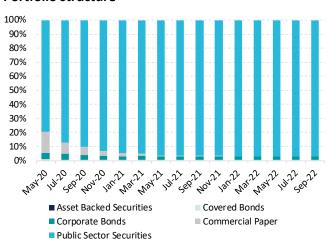


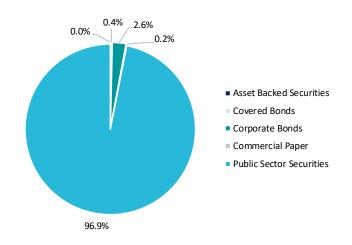


## Holdings under the PEPP (in EURm)

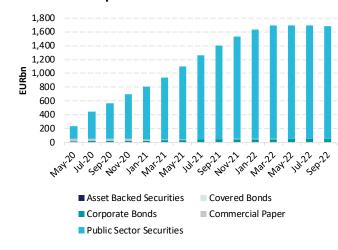
	Asset-backed Securities	Covered Bonds	Corporate Bonds	Commercial Paper	Public Sector Securities	PEPP
Jul-22	0	6,062	42,814	3,322	1,639,774	1,691,971
Sep-22	0	6,056	43,233	2,871	1,631,176	1,683,336
Δ (net purchases)	0	0	+453	-450	-4.320	-4.317

#### Portfolio structure

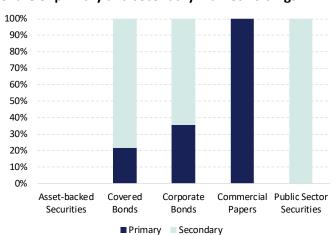




#### Portfolio development



#### Share of primary and secondary market holdings



# Breakdown of private sector securities under the PEPP

Sep-22	Asset-backed securities		Covered bonds		Corporate bonds		Commercial paper	
	Primary	Secondary	Primary	Secondary	Primary	Secondary	Primary	Secondary
Holdings in EURm	0	0	1,298	4,758	15,407	27,826	2,873	0
Share	0.0%	0.0%	21.4%	78.6%	35.6%	64.4%	100.0%	0.0%

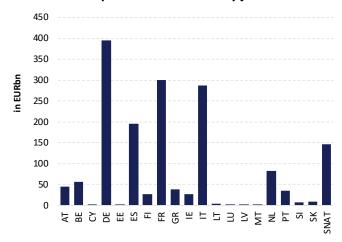
Source: ECB, Bloomberg, NORD/LB Markets Strategy & Floor Research



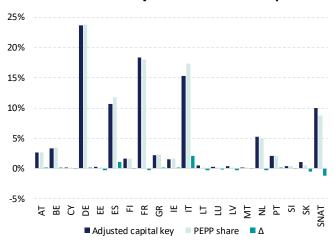
# Breakdown of public sector securities under the PEPP

Jurisdiction	Holdings (in EURm)	Adj. distribution key <sup>1</sup>	PEPP share	Deviations from the adj. distribution key²	Current WAM <sup>3</sup> (in years)	WAM of eligible universe <sup>4</sup> (in years)	Difference (in years)
AT	44,120	2.6%	2.7%	0.0%	7.6	7.4	0.3
BE	56,872	3.3%	3.4%	0.1%	6.4	9.5	-3.2
CY	2,483	0.2%	0.1%	0.0%	8.6	8.0	0.6
DE	395,153	23.7%	23.8%	0.1%	6.8	6.9	-0.1
EE	256	0.3%	0.0%	-0.2%	7.7	6.3	1.4
ES	196,176	10.7%	11.8%	1.1%	7.4	7.4	0.0
FI	26,381	1.7%	1.6%	-0.1%	7.5	7.9	-0.4
FR	299,737	18.4%	18.0%	-0.3%	7.8	7.8	0.0
GR	38,877	2.2%	2.3%	0.1%	8.5	9.3	-0.8
IE	26,328	1.5%	1.6%	0.1%	8.6	10.0	-1.3
IT	287,821	15.3%	17.3%	2.0%	7.2	7.0	0.3
LT	3,208	0.5%	0.2%	-0.3%	9.9	9.3	0.6
LU	1,879	0.3%	0.1%	-0.2%	6.1	6.9	-0.7
LV	1,890	0.4%	0.1%	-0.2%	8.2	8.1	0.1
MT	605	0.1%	0.0%	-0.1%	10.8	8.8	2.0
NL	82,869	5.3%	5.0%	-0.3%	7.9	8.6	-0.7
PT	35,492	2.1%	2.1%	0.0%	6.5	7.2	-0.7
SI	6,567	0.4%	0.4%	0.0%	8.8	9.1	-0.3
SK	7,966	1.0%	0.5%	-0.6%	8.4	8.0	0.5
SNAT	145,914	10.0%	8.8%	-1.2%	10.5	8.7	1.8
Total / Avg.	1,660,594	100.0%	100.0%	0.0%	7.6	7.6	0.0

# Distribution of public sector assets by jurisdiction



### Deviations from the adjusted distribution key



 $<sup>^{\</sup>mathrm{1}}$  Based on the ECB capital key, adjusted to include supras  $^{\mathrm{2}}$  Based on the adjusted distribution key

<sup>&</sup>lt;sup>3</sup> Current WAM of public sector securities holdings under the PEPP <sup>4</sup> WAM of eligible universe of public sector securities holdings under the PEPP Source: ECB, Bloomberg, NORD/LB Markets Strategy & Floor Research



## Aggregated purchase activity under APP and PEPP

# Holdings (in EURm)

	APP	PEPP	APP & PEPP
Aug-22	3,256,257	1,714,539	4,970,796
Sep-22	3,255,941	1,713,035	4,968,976
Δ	-316	-1,505	-1,821

### Monthly net purchases (in EURm)

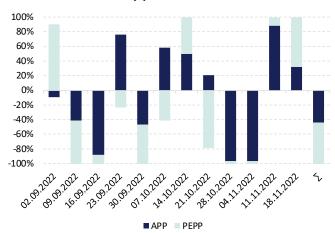


# Weekly purchases



Source: ECB, Bloomberg, NORD/LB Markets Strategy & Floor Research

# Distribution of weekly purchases



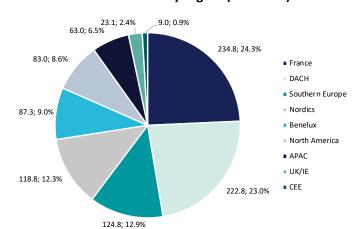


# Charts & Figures Covered Bonds

# **EUR** benchmark volume by country (in EURbn)

#### 119.4; 12.4% 234.8; 24.3% 32.1; 3.3% ■ DE 33.1; 3.4% ■ CA ■ ES 43.5; 4.5% ■ NL ■ NO 48.8; 5.0% AT 51.4; 5.3% AU 179.3; 18.5% = FI Others 72.5; 7.5% 83.0; 8.6%

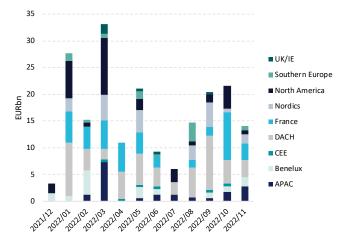
# EUR benchmark volume by region (in EURbn)



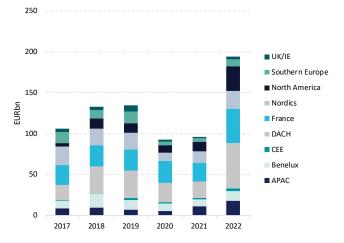
**Top-10 jurisdictions** 

Rank	Country	Amount outst. (EURbn)	No. of BMKs	There of ESG BMKs	Avg. issue size (EURbn)	Avg. initial maturity (in years)	Avg. mod. Duration (in years)	Avg. coupon (in %)
1	FR	234.8	226	15	0.95	9.8	5.3	0.95
2	DE	179.3	256	26	0.64	8.3	4.5	0.67
3	CA	83.0	64	0	1.26	5.6	2.9	0.53
4	ES	72.5	58	5	1.14	11.6	3.6	1.77
5	NL	68.8	70	1	0.92	11.3	7.1	0.81
6	NO	51.4	61	11	0.84	7.2	3.8	0.53
7	IT	48.8	59	2	0.79	9.2	3.8	1.28
8	AT	43.5	77	3	0.56	9.1	5.7	0.83
9	AU	33.1	33	0	1.00	7.7	3.9	1.12
10	FI	32.1	34	2	0.94	7.4	3.8	0.69

# EUR benchmark issue volume by month

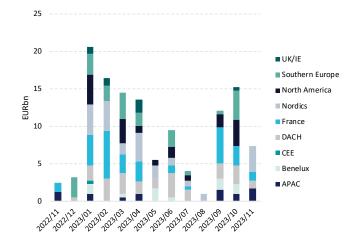


# EUR benchmark issue volume by year

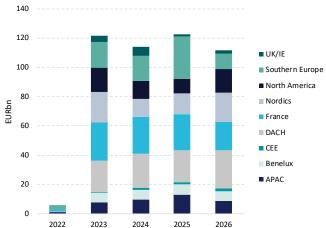




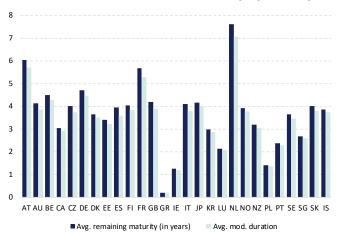
#### EUR benchmark maturities by month



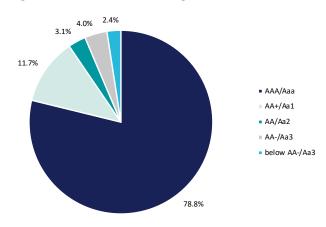
# EUR benchmark maturities by year



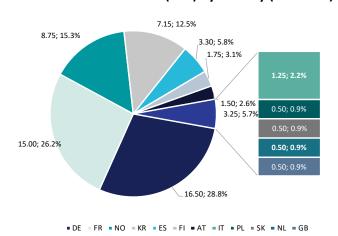
### Modified duration and time to maturity by country



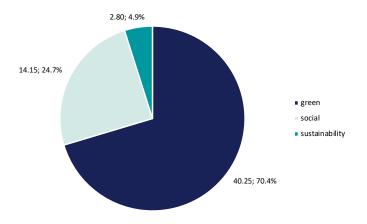
Rating distribution (volume weighted)



# EUR benchmark volume (ESG) by country (in EURbn)

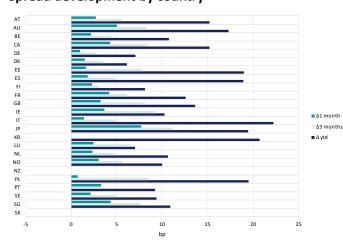


# EUR benchmark volume (ESG) by type (in EURbn)

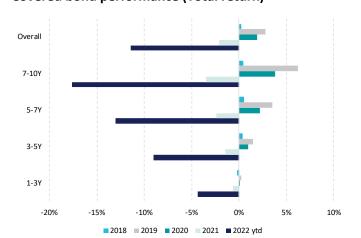




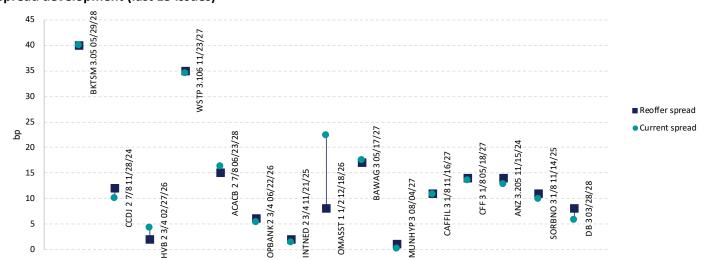
### Spread development by country



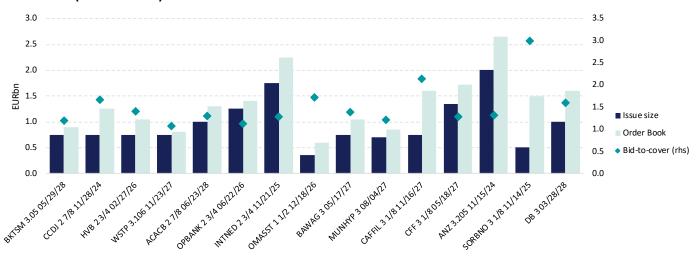
### **Covered bond performance (Total return)**



### Spread development (last 15 issues)

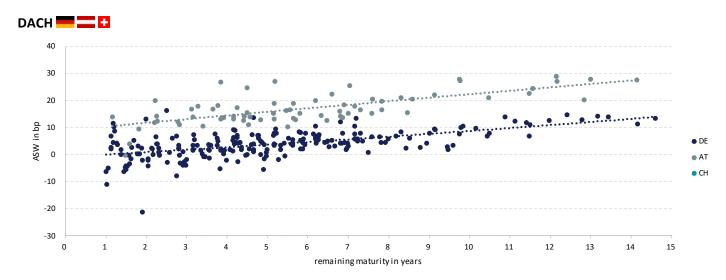


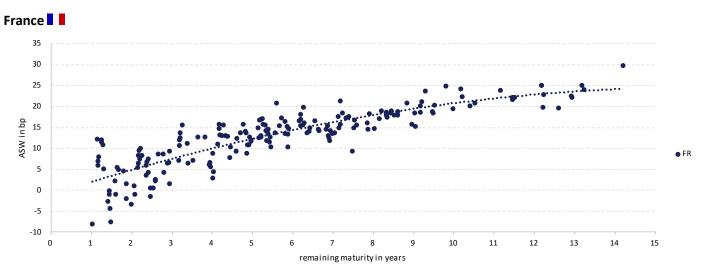
### Order books (last 15 issues)

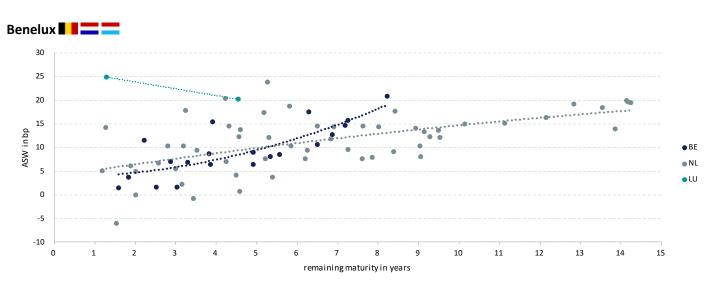




# Spread overview<sup>1</sup>

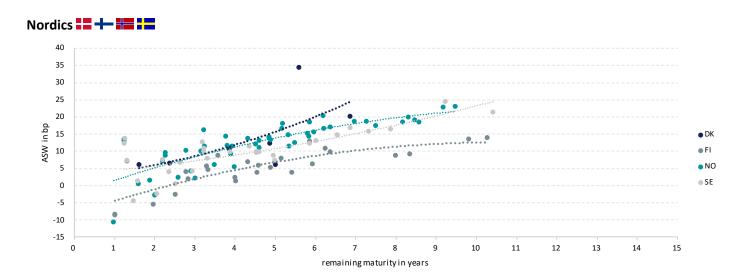


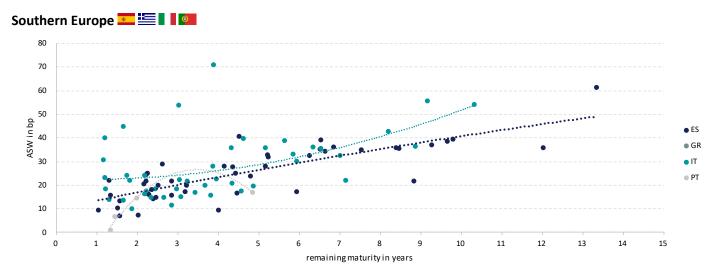


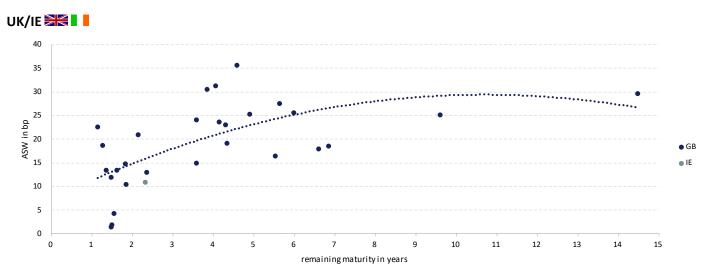


Source: Market data, Bloomberg, NORD/LB Markets Strategy & Floor Research  $^1$ Time to maturity  $1 \le y \le 15$ 



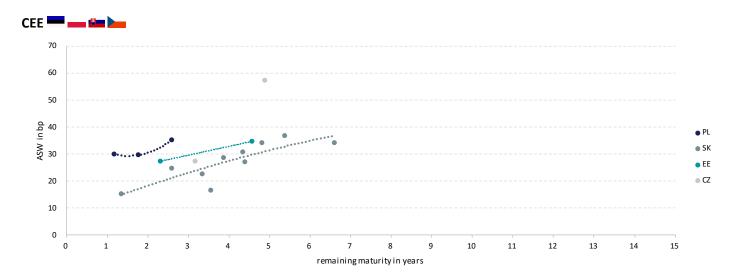


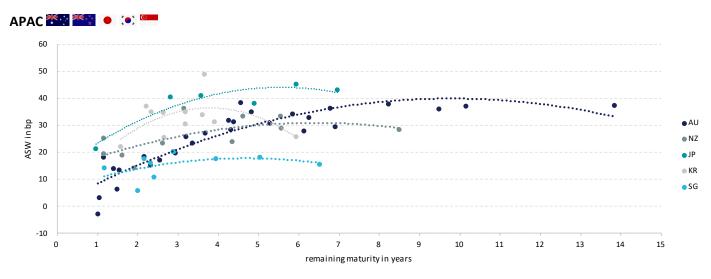


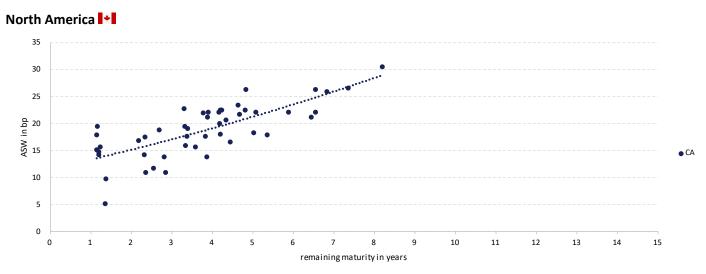


Source: Market data, Bloomberg, NORD/LB Markets Strategy & Floor Research







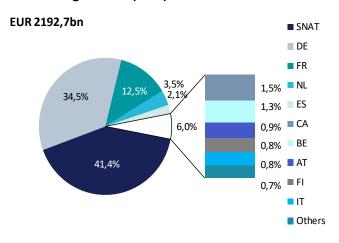


Source: Market data, Bloomberg, NORD/LB Markets Strategy & Floor Research



# Charts & Figures SSA/Public Issuers

#### **Outstanding volume (bmk)**



#### Top 10 countries (bmk)

Country	Vol. (€bn)	No. of bonds	ØVol. (€bn)	Vol. weight. ØMod. Dur.
SNAT	914,5	219	4,2	8,3
DE	757,6	564	1,3	6,3
FR	274,7	182	1,5	6,3
NL	77,2	69	1,1	6,6
ES	45,6	60	0,8	4,8
CA	32,6	23	1,4	4,7
BE	27,5	31	0,9	12,0
AT	19,8	23	0,9	4,6
FI	18,5	22	0,8	5,6
IT	17,3	21	0,8	4,9

#### Issue volume by year (bmk)



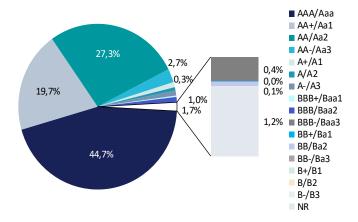
Maturities next 12 months (bmk)



Avg. mod. duration by country (vol. weighted)



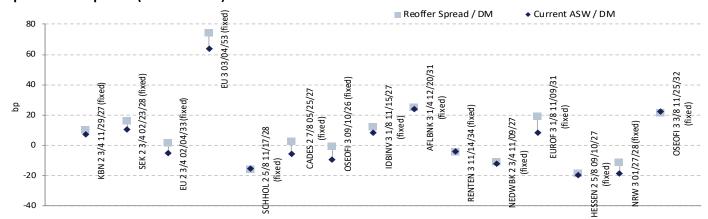
Rating distribution (vol. weighted)



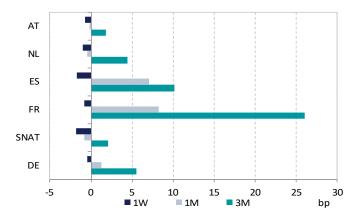
Source: Bloomberg, NORD/LB Markets Strategy & Floor Research



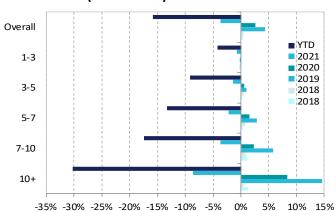
#### Spread development (last 15 issues)



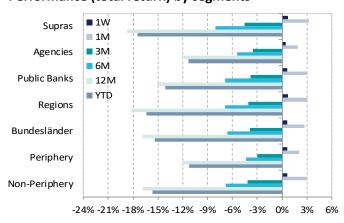
#### Spread development by country



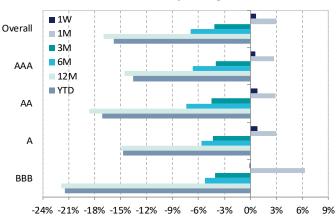
#### Performance (total return)



#### Performance (total return) by segments



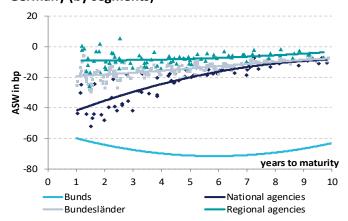
Performance (total return) by rating



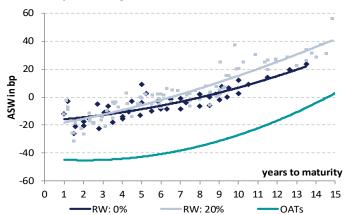
Source: Bloomberg, NORD/LB Markets Strategy & Floor Research



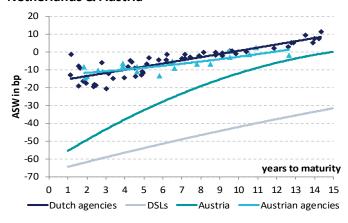
#### **Germany (by segments)**



#### France (by risk weight)

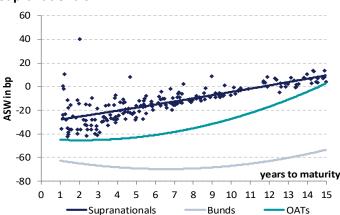


#### **Netherlands & Austria**

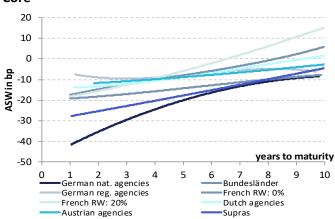


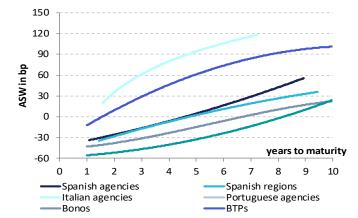
#### **Supranationals**

**Periphery** 



#### Core





Source: Bloomberg, NORD/LB Markets Strategy & Floor Research



## **Appendix**

### Overview of latest Covered Bond & SSA View editions

Publication	Topics			
35/2022 ♦ 16 November	<ul> <li>Covered bond jurisdictions in the spotlight</li> </ul>	t: a look at Austria		
	<ul> <li>Development of the German property ma</li> </ul>	arket		
	EIB goes Blockchain again!			
34/2022 ♦ 09 November	<ul> <li>Covered bond jurisdictions in the spotlight</li> </ul>	t: a look at Norway		
	<ul> <li>Tenth edition of the NORD/LB Issuer Guid</li> </ul>	le Covered Bonds		
	<ul> <li>SSA primary stats ytd before the final spr</li> </ul>	nt		
33/2022 ♦ 26 October	<ul> <li>Repayment structures on the covered bo shadows</li> </ul>	nd market: EU harmonisation project	consigns hard bullets to the	
	The debt brake at Laender level			
32/2022 ♦ 19 October	■ ECB preview: +75bp and the balance shee	et question		
	<ul> <li>EBA Risk Dashboard paints a robust pictu</li> </ul>	re in Q2 2022		
	<ul> <li>An overview of the German Laender</li> </ul>			
31/2022 ♦ 12 October	<ul> <li>The covered bond rating approach of S&amp;I</li> </ul>	)		
	<ul> <li>Benchmark indices for German Laender</li> </ul>			
30/2022 ♦ 28 September	<ul> <li>Focus on covered bond jurisdictions: Sing</li> </ul>	apore in the spotlight		
	<ul> <li>German Laender: more ESG issues on the</li> </ul>	horizon?		
29/2022 ♦ 21 September	<ul> <li>ECBC publishes annual statistics for 2021</li> </ul>			
	Update: Gemeinschaft deutscher Laende	r (Ticker: LANDER)		
28/2022 • 07 September	Primary market: A little more to come!			
	<ul> <li>ECB: PEPP visibly active as first line of def</li> </ul>	ence		
27/2022 ♦ 31 August	■ ECB rate hikes: minimum of +100bp still t	o come by year-end		
	<ul> <li>Australia: Macquarie returns to the EUR I</li> </ul>	enchmark segment		
26/2022 ♦ 24 August	Development of the German property ma	arket		
	<ul> <li>Transparency requirements §28 PfandBG</li> </ul>	Q2/2022		
25/2022 ♦ 27 July	■ ECB likes abbreviations: After OMT and S	MP, we now have TPI		
	<ul> <li>Covereds vs. Senior Unsecured Bonds</li> </ul>			
24/2022 ♦ 20 July	A brief spotlight on the EUR sub-benchmark	ark segment		
	<ul> <li>Deutsche Hypo real estate climate: index</li> </ul>	falls again		
23/2022 ♦ 13 July	■ ECB preview: might the ECB go slightly fu	rther?		
	■ EBA Report on Asset Encumbrance: levels			
22/2022 ♦ 06 July	<ul> <li>H1 review and outlook for H2 2022</li> </ul>			
	<ul> <li>Half time in the 2022 SSA year – taking st</li> </ul>	ock		
21/2022 ♦ 22 June	<ul> <li>Focus on ESG covered bonds: BayernLB's</li> </ul>			
	<ul> <li>Stability Council convenes for 25th meeti</li> </ul>	,		
20/2022 ♦ 15 June	<ul> <li>Covered bond jurisdictions in focus: a loo</li> </ul>			
	NGEU: Green Bond Dashboard	•		
NORD/LB:	NORD/LB:	NORD/LR:	Plaambara	
NOKD/LD:	NOKD/LD:	NORD/LB:	Bloomberg:	

Markets Strategy & Floor Research

NORD/LB:
Covered Bond Research

NORD/LB: SSA/Public Issuer Research

RESP NRDR <GO>



## Appendix Publication overview

#### **Covered Bonds:**

**Issuer Guide Covered Bonds 2022** 

**Covered Bond Directive: Impact on risk weights and LCR levels** 

Risk weights and LCR levels of covered bonds (updated semi-annually)

<u>Transparency requirements §28 PfandBG</u> (quarterly update)

Covered bonds as eligible collateral for central banks

#### **SSA/Public Issuers:**

<u>Issuer Guide – German Laender 2021</u>

<u>Issuer Guide – German Agencies 2022</u>

<u>Issuer Guide – Dutch Agencies 2022</u>

**Beyond Bundeslaender: Greater Paris (IDF/VDP)** 

**Spotlight on Belgian regions** 

**Spotlight on Spanish regions** 

#### **Fixed Income Specials:**

ESG-Update 2022

**ECB** interest rate decision: delivered as expected?

ECB acts as the 'House of Hikes' - or: Winter is coming!

ECB frontloads rate hike by +50bp and breaches pre-commitment

**ECB ready for lift-off: Every journey starts with a first step** 



# Appendix Contacts at NORD/LB

#### **Markets Strategy & Floor Research**



**Dr Frederik Kunze**Covered Bonds/Banks

+49 172 354 8977 frederik.kunze@nordlb.de



Melanie Kiene Covered Bonds/Banks

+49 172 169 2633 melanie.kiene@nordlb.de



**Stefan Rahaus**Covered Bonds/Banks

+49 172 6086 438 stefan.rahaus@nordlb.de



**Dr Norman Rudschuck** SSA/Public Issuers

+49 152 090 24094 norman.rudschuck@nordlb.de



Jan-Phillipp Hensing SSA/Public Issuers

+49 172 425 2877 jan-phillipp.hensing@nordlb.de

$c_{\sim}$	2
Sal	162

# Institutional Sales +49 511 9818-9440 Sales Sparkassen & +49 511 9818-9400 Regionalbanken +49 511 9818-9400 Sales MM/FX +49 511 9818-9460 Sales Europe +352 452211-515

#### **Trading**

Covereds/SSA	+49 511 9818-8040
Financials	+49 511 9818-9490
Governments	+49 511 9818-9660
Länder/Regionen	+49 511 9818-9550
Frequent Issuers	+49 511 9818-9640

#### **Origination & Syndicate**

Origination FI	+49 511 9818-6600
Origination Corporates	+49 511 361-2911

#### **Sales Wholesale Customers**

Firmenkunden	+49 511 361-4003
Asset Finance	+49 511 361-8150

#### **Treasury**

Collat. Management/Repos	+49 511 9818-9200
Liquidity Management	+49 511 9818-9620
Elquidity ividinagement	+49 511 9818-9650



#### Disclaimer

The present report (hereinafter referred to as "information") was drawn up by NORDDEUTSCHE LANDESBANK GIROZENTRALE (NORD/LB). The supervisory authorities responsible for NORD/LB are the European Central Bank (ECB), Sonnemannstraße 20, D-60314 Frankfurt am Main, and the Federal Financial Supervisory Authority in Germany (Bundesanstalt für Finanzdienstleitungsaufsicht; BaFin), Graurheindorfer Str. 108, D-53117 Bonn and Marie-Curie-Str. 24-28, D-60439 Frankfurt am Main. The present report and the products and services described herein have not been reviewed or approved by the relevant supervisory authority.

The present information is addressed exclusively to Recipients in Austria, Belgium, Canada, Cyprus, the Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Indonesia, Ireland, Italy, Japan, Korea, Luxembourg, the Netherlands, New Zealand, Poland, Portugal, Singapore, Portugal, Spain, Sweden, Switzerland, the Republic of China (Taiwan), Thailand, the United Kingdom and Vietnam (hereinafter referred to as "Relevant Persons" or "Recipients"). The contents of the information are disclosed to the Recipients on a strictly confidential basis and, by accepting such information, the Recipients shall agree that they will not forward it to third parties, copy and/or reproduce this information without the prior written consent of NORD/LB. The present information is addressed solely to the Relevant Persons and any parties other than the Relevant Persons shall not rely on the information contained herein. In particular, neither this information nor any copy thereof shall be forwarded or transmitted to the United States of America or its territories or possessions, or distributed to any employees or affiliates of Recipients resident in these jurisdictions.

The present information does not constitute financial analysis within the meaning of Art. 36 (1) of the Delegate Regulation (EU) 2017/565, but rather represents a marketing communication for your general information within the meaning of Art. 36 (2) of this Regulation. Against this background, NORD/LB expressly points out that this information has not been prepared in accordance with legal provisions promoting the independence of investment research and is not subject to any prohibition of trading following the dissemination of investment research. Likewise, this information does not constitute an investment recommendation or investment strategy recommendation within the meaning of the Market Abuse Regulation (EU) No. 596/2014.

This report and the information contained herein have been compiled and are provided exclusively for information purposes. The present information is not intended as an investment incentive. It is provided for the Recipient's personal information, subject to the express understanding, which shall be acknowledged by the Recipient, that it does not constitute any direct or indirect offer, recommendation, solicitation to purchase, hold or sell or to subscribe for or acquire any securities or other financial instruments nor any measure by which financial instruments might be offered or sold.

All actual details, information and statements contained herein were derived from sources considered reliable by NORD/LB. For the preparation of this information, NORD/LB uses issuer-specific financial data providers, own estimates, company information and public media. However, since these sources are not verified independently, NORD/LB cannot give any assurance as to or assume responsibility for the accuracy and completeness of the information contained herein. The opinions and prognoses given herein on the basis of these sources constitute a non-binding evaluation of the employees of the Markets Strategy & Floor Research division of NORD/LB. Any changes in the underlying premises may have a material impact on the developments described herein. Neither NORD/LB nor its governing bodies or employees can give any assurances as to or assume any responsibility or liability for the accuracy, appropriateness and completeness of this information or for any loss of return, any indirect, consequential or other damage which may be suffered by persons relying on the information or any statements or opinions set forth in the present Report (irrespective of whether such losses are incurred due to any negligence on the part of these persons or otherwise).

Past performance is not a reliable indicator of future performance. Exchange rates, price fluctuations of the financial instruments and similar factors may have a negative impact on the value and price of and return on the financial instruments referred to herein or any instruments linked thereto. Fees and commissions apply in relation to securities (purchase, sell, custody), which reduce the return on investment. An evaluation made on the basis of the historical performance of any security does not necessarily provide an indication of its future performance.

The present information neither constitutes any investment, legal, accounting or tax advice nor any assurance that an investment or strategy is suitable or appropriate in the light of the Recipient's individual circumstances, and nothing in this information constitutes a personal recommendation to the Recipient thereof. The securities or other financial instruments referred to herein may not be suitable for the Recipient's personal investment strategies and objectives, financial situation or individual needs.

Moreover, the present report in whole or in part is not a sales or other prospectus. Accordingly, the information contained herein merely constitutes an overview and does not form the basis for any potential decision to buy or sell on the part of an investor. A full description of the details relating to the financial instruments or transactions which may relate to the subject matter of this report is given in the relevant (financing) documentation. To the extent that the financial instruments described herein are NORD/LB's own issues and subject to the requirement to publish a prospectus, the conditions of issue applicable to any individual financial instrument and the relevant prospectus published with respect thereto as well NORD/LB's relevant registration form, all of which are available for download at www.nordlb.de and may be obtained free of charge from NORD/LB, Georgsplatz 1, 30159 Hanover, shall be solely binding. Furthermore, any potential investment decision should be made exclusively on the basis of such (financing) documentation. The present information cannot replace personal advice. Before making an investment decision, each Recipient should consult an independent investment adviser for individual investment advice with respect to the appropriateness of an investment in financial instruments or investment strategies subject to this information as well as for other and more recent information on certain investment opportunities.

Each of the financial instruments referred to herein may involve substantial risks, including capital, interest, index, currency and credit risks in addition to political, fair value, commodity and market risks. The financial instruments could experience a sudden and substantial deterioration in value, including a total loss of the capital invested. Each transaction should only be entered into on the basis of the relevant investor's assessment of his or her individual financial situation as well as of the suitability and risks of the investment.



NORD/LB and its affiliated companies may participate in transactions involving the financial instruments described in the present information or their underlying basis values for their own account or for the account of third parties, may issue other financial instruments with the same or similar features as those of the financial instruments presented in this information and may conduct hedging transactions to hedge positions. These measures may affect the price of the financial instruments described in the present information.

If the financial instruments presented in this information are derivatives, they may, depending on their structure, have an initial negative market value from the customer's perspective at the time the transaction is concluded. NORD/LB further reserves the right to transfer its economic risk from a derivative concluded with it to a third party on the market by means of a mirror-image counter transaction.

More detailed information on any commission payments which may be included in the selling price can be found in the "Customer Information on Securities Business" brochure, which is available to download at <a href="https://www.nordlb.de">www.nordlb.de</a>.

The information contained in the present report replaces all previous versions of corresponding information and refers exclusively to the time of preparation of the information. Future versions of this information will replace this version. NORD/LB is under no obligation to update and/or regularly review the data contained in such information. No guarantee can therefore be given that the information is up-to-date and continues to be correct. By making use of this information, the Recipient shall accept the terms and conditions outlined above.

NORD/LB is a member of the protection scheme of Deutsche Sparkassen-Finanzgruppe. Further information for the Recipient is indicated in clause 28 of the General Terms and Conditions of NORD/LB or at <a href="https://www.dsgv.de/sicherungssystem">www.dsgv.de/sicherungssystem</a>.

#### Additional information for Recipients in Australia:

NORD/LB IS NOT A BANK OR DEPOSIT TAKING INSTITUTION AUTHORISED UNDER THE 1959 BANKING ACT OF AUSTRALIA. IT IS NOT SUPERVISED BY THE AUSTRALIAN PRUDENTIAL REGULATION AUTHORITY. NORD/LB does not provide personal advice with this information and does not take into account the objectives, financial situation or needs of the Recipient (other than for the purpose of combating money laundering).

#### Additional information for Recipients in Austria:

None of the information contained herein constitutes a solicitation or offer by NORD/LB or its affiliates to buy or sell any securities, futures, options or other financial instruments or to participate in any other strategy. Only the published prospectus pursuant to the Austrian Capital Market Act should be the basis for any investment decision of the Recipient. For regulatory reasons, products mentioned herein may not be on offer in Austria and therefore not available to investors in Austria. Therefore, NORD/LB may not be able to sell or issue these products, nor shall it accept any request to sell or issue these products to investors located in Austria or to intermediaries acting on behalf of any such investors.

#### Additional information for Recipients in Belgium:

Evaluations of individual financial instruments on the basis of past performance are not necessarily indicative of future results. It should be noted that the reported figures relate to past years.

#### Additional information for Recipients in Canada:

This report has been prepared solely for information purposes in connection with the products it describes and should not, under any circumstances, be construed as a public offer or any other offer (direct or indirect) to buy or sell securities in any province or territory of Canada. No financial market authority or similar regulatory body in Canada has made any assessment of these securities or reviewed this information and any statement to the contrary constitutes an offence. Potential selling restrictions may be included in the prospectus or other documentation relating to the relevant product.

#### Additional information for Recipients in Cyprus:

This information constitutes an analysis within the meaning of the section on definitions of the Cyprus Directive D1444-2007-01 (No. 426/07). Furthermore, this information is provided for information and promotional purposes only and does not constitute an individual invitation or offer to sell, buy or subscribe to any investment product.

#### Additional information for Recipients in the Czech Republic:

There is no guarantee that the invested amount will be recouped. Past returns are no guarantee of future results. The value of the investments may rise or fall. The information contained herein is provided on a non-binding basis only and the author does not guarantee the accuracy of the content.

#### Additional information for Recipients in Denmark:

This Information does not constitute a prospectus under Danish securities law and consequently is not required to be, nor has been filed with or approved by the Danish Financial Supervisory Authority, as this Information either (i) has not been prepared in the context of a public offering of securities in Denmark or the admission of securities to trading on a regulated market within the meaning of the Danish Securities Trading Act or any executive orders issued pursuant thereto, or (ii) has been prepared in the context of a public offering of securities in Denmark or the admission of securities to trading on a regulated market in reliance on one or more of the exemptions from the requirement to prepare and publish a prospectus in the Danish Securities Trading Act or any executive orders issued pursuant thereto.

#### Additional information for Recipients in Estonia:

It is advisable to closely examine all the terms and conditions of the services provided by NORD/LB. If necessary, Recipients of this information should consult an expert.

#### Additional information for Recipients in Finland:

The financial products described herein may not be offered or sold, directly or indirectly, to any resident of the Republic of Finland or in the Republic of Finland, except pursuant to applicable Finnish laws and regulations. Specifically, in the case of shares, such shares may not be offered or sold, directly or indirectly, to the public in the Republic of Finland as defined in the Finnish Securities Market Act (746/2012, as amended). The value of investments may go up or down. There is no guarantee of recouping the amount invested. Past performance is no guarantee of future results.



#### Additional information for Recipients in France:

NORD/LB is partially regulated by the "Autorité des Marchés Financiers" for the conduct of French business. Details concerning the extent of our regulation by the respective authorities are available from us on request. The present information does not constitute an analysis within the meaning of Article 24 (1) Directive 2006/73/EC, Article L.544-1 and R.621-30-1 of the French Monetary and Financial Code, but does represent a marketing communication and does qualify as a recommendation pursuant to Directive 2003/6/EC and Directive 2003/125/EC.

#### Additional information for Recipients in Greece:

The information contained herein gives the view of the author at the time of publication and may not be used by its Recipient without first having confirmed that it remains accurate and up to date at the time of its use. Past performance, simulations or forecasts are therefore not a reliable indicator of future results. Investment funds have no guaranteed performance and past returns do not guarantee future performance.

#### Additional information for Recipients in Indonesia:

This report contains generic information and has not been tailored to the circumstances of any individual or specific Recipient. This information is part of NORD/LB's marketing material.

#### Additional information for Recipients in the Republic of Ireland:

This information has not been prepared in accordance with Directive (EU) 2017/1129 (as amended) on prospectuses (the "Prospectus Directive") or any measures made under the Prospectus Directive or the laws of any Member State or EEA treaty adherent state that implement the Prospectus Directive or such measures and therefore may not contain all the information required for a document prepared in accordance with the Prospectus Directive or the laws.

#### Additional information for Recipients in Japan:

This information is provided to you for information purposes only and does not constitute an offer or solicitation of an offer to enter into securities transactions or commodity futures transactions. Although the actual data and information contained herein has been obtained from sources which we believe to be reliable and trustworthy, we are unable to vouch for the accuracy and completeness of this actual data and information.

#### Additional information for Recipients in South Korea:

This information has been provided to you free of charge for information purposes only. The information contained herein is factual and does not reflect any opinion or judgement of NORD/LB. The information contained herein should not be construed as an offer, marketing, solicitation to submit an offer or investment advice with respect to the financial investment products described herein.

#### Additional information for Recipients in Luxembourg:

Under no circumstances shall the present information constitute an offer to purchase or issue or the solicitation to submit an offer to buy or subscribe for financial instruments and financial services in Luxembourg.

#### Additional information for Recipients in New Zealand:

NORD/LB is not a bank registered in New Zealand. This information is for general information only. It does not take into account the Recipient's financial situation or objectives and is not a personalised financial advisory service under the 2008 Financial Advisers Act.

#### Additional information for Recipients in the Netherlands:

The value of your investment may fluctuate. Past performance is no guarantee for the future.

#### Additional information for Recipients in Poland:

This information does not constitute a recommendation within the meaning of the Regulation of the Polish Minister of Finance Regarding Information Constituting Recommendations Concerning Financial Instruments or Issuers thereof dated 19 October 2005.

#### Additional information for Recipients in Portugal:

This information is intended only for institutional clients and may not be (i) used by, (ii) copied by any means or (iii) distributed to any other kind of investor, in particular not to retail clients. The present information does not constitute or form part of an offer to buy or sell any of the securities covered by the report, nor should it be understood as a request to buy or sell securities where that practice may be deemed unlawful. The information contained herein is based on information obtained from sources which we believe to be reliable, but is not guaranteed as to accuracy or completeness. Unless otherwise stated, all views contained herein relate solely to our research and analysis and are subject to change without notice.

#### Additional information for Recipients in Sweden:

This information does not constitute (or form part of) a prospectus, offering memorandum, any other offer or solicitation to acquire, sell, subscribe for or otherwise trade in shares, subscription rights or other securities, nor shall it or any part of it form the basis of or be relied on in connection with any contract or commitment whatsoever. The present information has not been approved by any regulatory authority. Any offer of securities will only be made pursuant to an applicable prospectus exemption under the EC Prospectus Directive (Directive (EU) 2017/1129), and no offer of securities is being directed to any person or investor in any jurisdiction where such action is wholly or partially subject to legal restrictions or where such action would require additional prospectuses, other offer documentation, registrations or other actions.

#### Additional information for Recipients in Switzerland:

This information has not been approved by the Federal Banking Commission (merged into the Swiss Financial Market Supervisory Authority (FINMA) on 1 January 2009). NORD/LB will comply with the Directives of the Swiss Bankers Association on the Independence of Financial Research (as amended). The present information does not constitute an issuing prospectus pursuant to article 652a or article 1156 of the Swiss Code of Obligations. The information is published solely for the purpose of information on the products mentioned herein. The products do not qualify as units of a collective investment scheme pursuant to the Federal Act on Collective Investment Schemes (CISA) and are therefore not subject to supervision by FINMA.



#### Additional information for Recipients in the Republic of China (Taiwan):

This information is provided for general information only and does not take into account the individual interests or requirements, financial status and investment objectives of any specific investor. Nothing herein should be construed as a recommendation or advice for you to subscribe to a particular investment product. You should not rely solely on the information provided herein when making your investment decisions. When considering any investment, you should endeavour to make your own independent assessment and determination on whether the investment is suitable for your needs and seek your own professional financial and legal advice. NORD/LB has taken all reasonable care in producing this report and trusts that the information is reliable and suitable for your situation at the date of publication or delivery. However, no guarantee of accuracy or completeness is given. To the extent that NORD/LB has exercised the due care of a good administrator, we accept no responsibility for any errors, omissions, or misstatements in the information given. NORD/LB does not guarantee any investment results and does not guarantee that the strategies employed will improve investment performance or achieve your investment objectives.

#### Information for Recipients in the United Kingdom:

NORD/LB is subject to partial regulation by the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA). Details of the scope of regulation by the FCA and the PRA are available from NORD/LB on request. The present information is "financial promotion". Recipients in the United Kingdom should contact the London office of NORD/LB, Investment Banking Department, telephone: 0044 / 2079725400, in the event of any queries. An investment in financial instruments referred to herein may expose the investor to a significant risk of losing all the capital invested.

Time of going to press: Wednesday, 23 November 2022 (08:55)

Distribution: 23.11.2022 17:01:40