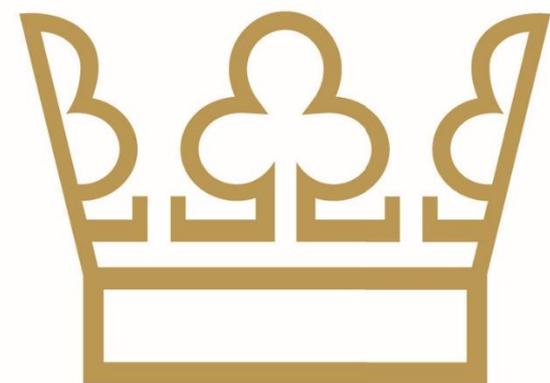
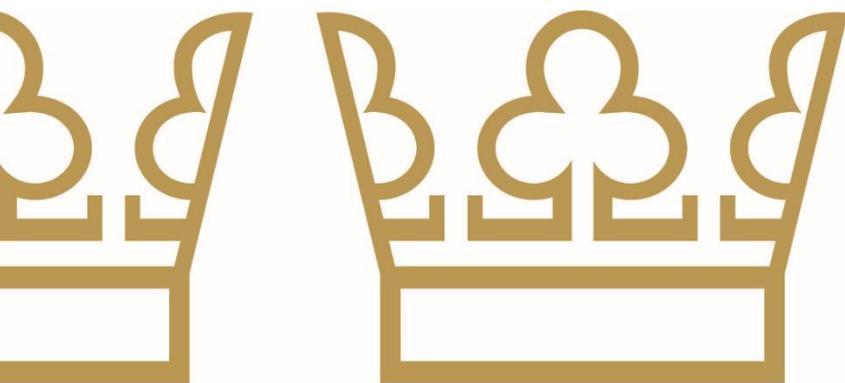


Financial and Risk Policy 2021

*Adopted by the Board of the Swedish National Debt Office on 9 December
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Introduction

Under the Ordinance (2007:1447) containing Instructions for the Swedish National Debt Office, there must be a description of the main risks associated with the operations of the Debt Office and of how they are to be managed. There must also be internal instructions for managing these risks. The description, the internal instructions and compliance with the instructions are to be kept under continual review. The Ordinance containing Instructions for the Swedish National Debt Office also states that the Board is to adopt frameworks and guidelines for the risks associated with the Debt Office's operations.

The Financial and Risk Policy supports the Debt Office's risk management and its internal control. The policy provides an overview of the agency's management of financial risks and the level of risk selected. The policy brings together rules, frameworks and target values for managing risks that arise in the operations of the Debt Office. It also specifies certain principles for the conduct of operations. The annual review, reconsideration and adoption of this policy establish a process that ensures the policy remains up-to-date and relevant.

The issuance of guarantees and credits in the Central government guarantee and lending process is preceded by separate decisions by the Riksdag (Swedish Parliament) and the Government. This means that the level of risk in these operations is largely steered by the commitments established by the Riksdag and the Government.

There is a specific decision-making body for resolution matters in the Debt Office called the Resolution Board. The Resolution Board makes decisions on issues to be examined by the Debt Office under the Resolution Act (2015:1016), as the supporting authority under the Precautionary State Aid to Credit Institutions Act (2015:1017) – or as the guarantee authority under the Investor Compensation Act (1999:158) and the Deposit Guarantee Act (1995:1571) if the issues concern matters of principle, are of major importance, or relate to regulations. These issues are regulated by a separate financial policy adopted by the Resolution Board.

The risk map (Appendix 1) shows the primary risks identified within the framework of the Debt Office's operations. These risks, except for operational risk, are covered by the Financial and Risk Policy. Market and liquidity risks are mainly managed within the framework of the Management and payment of central government debt process and are therefore described in that section (Section 2). Credit risks are described in a separate section (Section 6). Operational risk is managed in accordance with the Debt Office's policy for internal governance and control. Business risk, external risk, concentration risk and strategic risk are not given separate sections but are mainly managed within the framework of other risks (see Appendix 2). It should also be noted that there is no separate process for identification and management of reputational risk. Instead, this risk is taken into account in connection with impact assessments of other risks.

The policy sets out Board decisions. Discussions and analyses underlying these decisions are to be found in separate memoranda. There is a list of these documents in Appendix 4. Operational decisions that follow from this policy are made by the Debt Office Director General, or officials in accordance with delegation procedures set out in the rules of procedure of the Debt Office and the relevant departments.

1 Debt Office risk management

1.1 Framework

The purpose of risk management work is to identify and manage risks that affect achievement of the Debt Office's objectives.

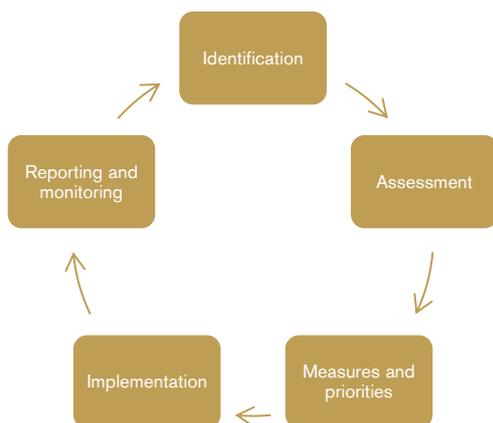
Risk management provides a readiness to act and the ability to plan and execute activities to manage risks. To achieve this, the risks must be known and the measures the Debt Office chooses to take, or not to take, must be the result of deliberate decisions. Risk management, therefore, makes it possible to take decisions on balancing costs and risks.

Objective

The Debt Office is to have good internal control through effective and appropriate risk management in accordance with market practice. In its management of financial risks, the Debt Office is to meet the requirements relevant to its operations under the legislation for financial companies and the regulations and general advice issued by Finansinspektionen (the Swedish Financial Supervisory Authority).

1.2 The Debt Office's risk management process

The Debt Office is to have a systematic process for risk management. The process is based on five steps:



Identification

Risk identification is based on what has happened and what can happen.

Assessment

The assessment of the financial risks identified is conducted by using quantitative methods and measurements.

Measures and priorities

After the risk has been identified and assessed, the following courses of action are available:

- Eliminate the risk
- Limit the risk
- Transfer (insure) the risk
- Accept the risk

The choice depends on how the particular risk has been assessed, and on the level of risk selected. A trade-off is made between expected cost and risk.

Implementation

The Debt Office's operations are responsible for implementing the chosen measures for achieving the level of risk selected.

Reporting and monitoring

The effects of the risk management measures taken are monitored, evaluated and reported.

2 Management and payment of central government debt process

General framework

The management of the central government debt is governed by the Budget Act (SFS 2011:203), which sets out the objective for the management of the central government debt and the purposes for which the Government may raise loans.¹

The Act also states that the Government shall adopt guidelines for the management of the central government debt each year. The Government's decision reflects a desired trade-off between the expected cost and risk of the debt. Under the Act, the Government must also present an evaluation of the management of the central government debt to the Riksdag every two years.

The Government has delegated the right to raise loans and the responsibility for the continual management of the central government debt to the Debt Office.

Objective

Under the Budget Act, the objective is to manage the central government debt in such a way as to minimise the long-term cost of the debt while taking account of the risk in its management. The management of the debt is also to be conducted within the framework of monetary policy requirements.

Decisions by the Debt Office

The Government's guidelines decision for the management of the central government debt entails that the Debt Office is responsible for taking strategic decisions within the framework of the guidelines and for the implementation of these decisions in the operational management of the central government debt. The Debt Office is to establish internal guidelines based on the Government's guidelines. These decisions are to concern the utilisation of the position-taking mandate, the maturities of individual debt types, the foreign currency distribution in the foreign currency debt and principles for market support and debt maintenance.

This means that the Debt Office must establish intermediate objectives and internal guidelines for the operational management of the central government debt. The Financial and Risk Policy translates the Government's guidelines decisions for the management of the central government debt into operational decisions that guide continual borrowing and debt management. To increase clarity, some of the Government's guidelines decisions are reproduced in the Financial and Risk Policy.

2.1 Principles for the management of central government debt

Debt and market maintenance

The Government's guidelines state that the Debt Office, through market and debt maintenance, is to contribute to reducing the costs of the central government debt. The Financial and Risk Policy establishes principles for debt and market maintenance that guide the management of the central government debt. These principles show how the Debt Office will contribute to the development and maintenance of well-functioning government securities markets, which is necessary to achieve the overall objective of long-term cost minimisation, taking account of risk.

The following principles are to provide guidance:

- The Debt Office shall act responsibly in all contexts. This includes always treating counterparties in an impartial and objective way and avoiding transactions that may result in damage to the reputation of the Debt Office or the Swedish Government. The requirement of a responsible approach is reinforced in the domestic krona market by the Debt Office's position as the dominant participant.
- The Debt Office shall be as consistent, predictable and open as possible in its information to, and communication with, the market – particularly markets for bonds and treasury bills denominated in Swedish kronor.

¹ Loans may be raised to: finance current deficits in the central government budget and other expenditure based on decisions by the Riksdag (Swedish Parliament); provide credits and perform guarantees decided on by the Riksdag; amortise, redeem and buy back central government loans; meet the need for central government loans at different maturities in consultation with the Riksbank

(Sweden's central bank); and meet the Riksbank's foreign currency reserve needs.

- The Debt Office's borrowing shall be characterised by transparency and predictability.
- In the management of the central government debt, the Debt Office is to take refinancing risks into consideration, including by issuing instruments with maturities longer than twelve years.
- The Debt Office shall seek to broaden the investor base for Swedish government securities.
- The Debt Office is to have sales channels that are efficient and have a positive impact on the functioning of the market in Swedish government securities.
- The Debt Office is to support the liquidity of the government securities market by providing repo and switch facilities.
- The Debt Office shall work to ensure that infrastructure is in place that enables the market in Swedish government securities to function effectively.

Entering into transactions

The purpose of the following principle is to reduce the operational risk in the management of the central government debt.

The Debt Office may only enter into transactions that it has the competence, systems and procedures to handle.

Management of the foreign currency debt

The purpose of the following principle is to reduce the risk that transactions cannot be valued on a continual basis.

In managing the foreign currency debt, the Debt Office shall act in markets that are liquid and well-developed. If derivative transactions can be made that lead to the elimination of market risk in a borrowing transaction, lower liquidity requirements in the market in the borrowed currency can be accepted.

2.2 Composition of the central government debt

This section describes how the central government debt shall be allocated to different debt types. The composition of the debt shall be based on nominal value at the current exchange rate, including accrued inflation. The exposure comprises the net of non-government assets and liabilities with the addition of the foreign currency exposure arising in the central government's internal bank operations.² Positions

taken with derivatives to actively alter the exposure are excluded from the calculation.

2.2.1 Nominal krona debt

The nominal krona debt is the part of the central government debt that is not inflation-linked krona debt or foreign currency debt.

2.2.2 Share of inflation-linked krona debt

In accordance with the Government guidelines, the share of inflation-linked krona debt shall be 20 per cent of the central government debt in the long term. This share is calculated using nominal amounts at the current exchange rate including accrued inflation compensation.

Reporting to the Board

The share of the inflation-linked debt is to be reported on a continual basis as one-month moving averages of daily observations.

2.2.3 Exposure to foreign currency

The Government has decided that the level of foreign currency exposure of the central government debt is to remain unchanged. However, the exposure may vary as a result of the Debt Office's continual foreign currency management.

In 2021, the Debt Office shall not carry out any currency exchange transactions to adjust the foreign currency exposure of the central government debt. Exchanges shall only be carried out to restore the foreign currency exposure in accordance with the principles in Section 2.4.

Reporting to the Board

The foreign currency exposure of the central government debt is to be reported continually based on daily observations, expressed in both foreign currency and Swedish kronor using exchange rates as of 30 November 2020.

The reporting of the change in foreign currency exposure is to be divided into the process Management and payment of central government debt and other processes.

2.2.4 Foreign currency target value

In accordance with the Government guidelines, the Debt Office shall set a target value for the distribution of the foreign currency debt among different currencies.

² Non-government assets include on-lending to the Riksbank and other states as well as assets in liquidity management.

The foreign currency target value at the end of both 2020 and 2021 is presented in Table 1. The exposure is measured as the nominal amount expressed in each foreign currency. The exposure in EUR may vary due to the Debt Office's continual foreign currency management in accordance with the principles in Section 2.4. In other currencies, the exposure shall remain unchanged during the year.

Table 1. Foreign currency target value, in millions of foreign currency unit.

Currency	30 Dec 2020	30 Dec 2021
CAD	-31	-31
CHF	-3 280	-3 280
EUR	Remaining part	Remaining part
GBP	-29	-29
USD	-34	-34

The Debt Office Director General shall determine deviation intervals for the currencies included in the target value and to what extent there may be exposures to currencies not included in the target value.

2.3 Term to maturity of central government debt

The steering of the term to maturity of the central government debt is described below. Term to maturity refers to Macaulay duration (see Attachment 3).

The Government has decided that the term to maturity of the central government debt shall be between 3.5 and 6 years. The term to maturity may temporarily deviate from the term-to-maturity interval.

In accordance with the guidelines, the Debt Office is to establish a term-to-maturity interval for each debt type: the nominal krona debt, the inflation-linked krona debt, and the foreign currency debt.

2.3.1 Nominal krona debt

The term to maturity of the nominal krona debt shall be between 4.1 and 6.4 years. The term to maturity may temporarily deviate from the term-to-maturity interval.

2.3.2 Inflation-linked krona debt

The term to maturity of the inflation-linked krona debt shall be between 5.1 and 6.6 years. The term to maturity may temporarily deviate from the term-to-maturity interval.

2.3.3 Foreign currency debt

The term to maturity of the foreign currency debt shall be between 0 and 1 year. The term to maturity may temporarily deviate from the term-to-maturity interval.

The maturities for the individual currencies with exposure that exceeds the equivalent of SEK 5 billion are to be between 0 and 1 years. The maturities may temporarily deviate from the maturity interval. Interest rate re-fixing is to be distributed evenly over time.

The steering of the term to maturity for currencies with exposure up to the equivalent of SEK 5 billion shall be determined by the Debt Office Director General.

Reporting to the Board

Maturities are to be reported as one-month moving averages of daily observations. The reporting shall comprise both the debt as a whole and the individual debt types. Deviations are supplemented with an explanation of the sequence of events.

2.4 Exchanges between Swedish kronor and foreign currency

In 2021, the Debt Office shall not carry out any transactions for the purposes of altering the foreign currency exposure of the central government debt. There are, however, other factors that give rise to changes in the foreign currency exposure of the central government debt.³ Accordingly, needs arise continually for currency exchanges in order to restore the foreign currency exposure of the central government debt in accordance with the Government guidelines.

In accordance with the Ordinance containing Instructions for the Swedish National Debt Office, currency exchanges must be carried out with predictability and clarity.

The Debt Office's exchanges between Swedish kronor and foreign currency shall therefore follow an even exchange path. This is to be determined by spreading the net exchange volume evenly over time. Exchanges made in connection with possible positions between kronor and foreign currency are excluded.

Minor deviations from the exchange path are permitted.

³ This entails, among other things, interest payments on foreign currency loans, EU payments, other agencies' foreign currency hedges and the central government's multi-currency cash pool.

Reporting to the Board

The determined accumulated exchange path and the actual accumulated exchanges shall be reported on a continual basis.

2.5 Position taking

Positions are transactions that are intended to reduce the cost of the central government debt while taking account of risk, or to reduce the risk for the central government debt while taking account of cost, and that are not justified by underlying borrowing or investment requirements.

The Government has decided that the Debt Office is permitted to take positions in foreign currencies that are potential borrowing currencies and in the krona exchange rate to these currencies. Positions must not be taken in the Swedish fixed income market. Positions in foreign currency may only be taken using derivative instruments in liquid markets.

The Government has decided that positions in foreign currency are limited to SEK 300 million, measured as daily Value-at-Risk (VaR). Positions in the krona exchange rate may not exceed SEK 7.5 billion.

2.5.1 Continual position taking in foreign currency

Active management via continual position taking may only be carried out within the Debt Office ("internal continual management").

Permitted currencies

Currency and interest-rate positions may be taken in the following currencies: Australian dollar (AUD), Canadian dollar (CAD), Swiss franc (CHF), Danish krona (DKK), Euro (EUR), British pound (GBP), Japanese yen (JPY), Norwegian krona (NOK), and US dollar (USD).

Result and risk measurement

The result is measured as the change in the market value (including accrued interest) plus realised flows. The result is to be evaluated over five-year periods.

The risk is measured as daily Value-at-Risk (VaR) at a 95 per cent confidence level (see Appendix 3). The Debt Office's VaR model is evaluated once a year by comparing the actual and forecast outcome ("back-testing").

Portfolio value and risk mandate

Positions in foreign currency can be taken in a portfolio corresponding to a notional value of no more than SEK 200 billion. The aggregate risk of the positions may not exceed SEK 220 million measured as daily VaR.

The currency limits for each currency are ± 6.0 per cent of the value of the notional portfolio.

The interest rate risk limit measured in SEK is ± 0.90 per cent of the value of the notional portfolio. The interest rate risk limit for each currency is ± 0.60 per cent of the value of the notional portfolio.

Reporting to the Board

The result, outstanding positions and utilisation of the risk mandate shall be reported on a continual basis. Any violations of the risk mandate shall be explained. Positions shall not be included in the calculation of shares of debt, currency exposure and maturities referred to in Section 2.2 and 2.3.

The result of back-testing of the VaR model shall be reported annually.

2.5.2 Continual position taking in the krona exchange rate

Continual position taking in the krona exchange rate is not allowed.

3 Central government liquidity management process

General framework

Under the Ordinance (2007:1447) containing Instructions for the Swedish National Debt Office, one of the main tasks of the Debt Office is to be responsible for the central government payment model, including the Treasury Single Account (TSA) at the Riksbank. The Debt Office is also responsible for providing loans to, and accepting funds on account from, mainly government agencies.

The Capital Supply Ordinance (2011:210) governs how these agencies are entitled, and obligated, to finance assets through loans at the Debt Office. Under the Ordinance, the Debt Office also has the task of transferring appropriated funds to the agencies' interest-bearing accounts.

Under the Ordinance (2017:170) on government agencies' payments and management of funds (the Payment Ordinance), the Debt Office is responsible for the TSA at the Riksbank. This Ordinance contains rules on government agency accounts, payments, management of funds and foreign currency hedging.

Centralised liquidity management and effective payment services play an important part in making the payment model effective for both agencies and central government as a whole. The Debt Office has chosen to divide payment services into four framework agreements for: payment services, payment card services, travel account services, and reloadable card services. The framework agreement for payment services covers government agencies' incoming and outgoing payment services and is usually directly linked to the payment model. Credit risks associated with the agreement are dealt with in Section 6.2. The other three framework agreements do not contain any appreciable credit risk. However, there is a reputational risk if, for example, one party to the agreement does not deliver as agreed. All the agreements have a termination clause that entitles the Debt Office to terminate the agreement.

Under the Ordinance on Administration of the Contribution to the European Union Budget (2004:1333), the Debt Office is responsible both for coordination of payments to the European Commission and for the administration of an account in the name of the Commission for crediting the contribution.

Objective

One of the Government's overall objectives for the Debt Office is for the central government payment model as a whole to be cost-effective and secure at the same time as the service to government agencies is good and the state's relation to the banks is neutral in terms of competition.

Deposits from and lending to government agencies are to take place on terms based on the central government's borrowing costs. Currency exchange transactions carried out by the Debt Office on behalf of government agencies are to be based on the central government's currency exchange costs.

Principles for central government liquidity management

The purpose of these principles is to achieve efficient and secure liquidity management both for the individual agency and for the central government as a whole.⁴ This means that:

- All daily incoming and outgoing payments in the activities financed via the central government budget are gathered in the TSA at the Riksbank, or in the Debt Office's foreign currency accounts.
- Government agencies' bank accounts have to be connected to the Debt Office's top accounts at the banks with which the Debt Office has the framework agreements for payment services.
- A government agency that wishes to open or alter a bank account must apply to the Debt Office to do so. The Debt Office is allowed to grant exemptions from this requirement.

⁴ The principles are mainly derived from the Payment Ordinance. The principle that the Debt Office will grant and convey payments to the EU Commission is based on a Government decision on 31 May 2001. The following three principles are based on the Debt Office's own decisions: that FX forwards may primarily be arranged in the currencies included in the Debt Office's foreign currency target

value; the examples given of the requirements on the security of payment intermediaries and services; and that the agencies are responsible for the security of their payments, including matters relating to authorised use and access to reserve procedures.

- In the case of accounts linked to a multi-currency cash pool structure in foreign currency, incoming and outgoing payments in the Debt Office's main currencies are gathered in foreign currency accounts.⁵
- In the case of accounts not linked to the multi-currency cash pool structure, the government agency shall make exchanges from or to Swedish kronor for every individual payment in foreign currency.
- If an FX forward is required for currency flows, the agency shall contact the Debt Office. FX forwards can be arranged primarily in the currencies included in the Debt Office's target value portfolio.⁶
- The approval of the Debt Office is required for the intermediation of payments directly to the Government's TSA.
- The Debt Office is to decide on regulations and general advice regarding the Payment Ordinance.
- The Debt Office is to procure framework agreements with payment intermediaries with which government agencies will have to place orders to meet their needs for payment services.
- In these framework agreements, the Debt Office sets security requirements for the payment intermediaries and services.
- Government agencies may only sign separate agreements for payment services outside the central government framework agreements following approval by the Debt Office. It is the government agencies' own responsibility to ensure compliance with the Swedish Public Procurement Act.
- Authorities are responsible for their payments and for placing orders for services under the framework agreement. This includes the provision of correct payment orders, authorised users, access to backup procedures during interruptions and disturbances and, if necessary, the signing of security agreements.
- The Debt Office is to analyse the risks in the payment model each year. Every two years, the Debt Office shall submit a report on these risks to the Government. The primary means that the Debt Office has for increasing the security of the payment model is through the procurement of framework agreements for payment services. The Debt Office may also communicate instructions for the enforcement of Ordinance (2017:170) on government agencies' payments and management of funds.

⁵ The multi-currency cash pool structure was introduced as of 1 April 2017. Government agencies' bank accounts in the Debt Office's main currencies are connected to the multi-currency cash pool structure in stages. The main currencies are currently EUR, GBP, JPY, CHF, USD, NOK and DKK.

⁶ See Section 2.2.4 Foreign currency target value.

4 Central government guarantee and lending process

General framework

In accordance with the Budget Act (2011:203), the Riksdag decides on the purpose and amount of central government credit guarantees and loans. The Budget Act treats loans and guarantees comparably in all material respects. The guarantee fee or interest charged corresponds to the central government's expected loss and other costs relating to the commitment.

If the fee or interest paid by the guarantee beneficiary or the borrower is lower than an amount corresponding to the expected cost, a subsidy arises. An amount corresponding to the subsidy shall then be financed in another way. The part of the fee or interest that corresponds to the expected loss is transferred to a reserve account, which is used to cover future credit losses that arise. In this way, long-term cost coverage is achieved for the central government guarantee and lending operations. The part of the fee that applies to other costs is managed by the Debt Office and used to cover administrative costs.

Decisions by the Riksdag regarding new guarantees or loans are followed by a decision by the Government issued to the responsible agency, specifying in detail the assignment and conditions. Accordingly, the Debt Office's outstanding guarantees and loans have to a large extent been preceded by individual decisions by the Riksdag and the Government. This means that the level of risk in the portfolio is largely steered by the commitments determined by the Riksdag and the Government.

The Ordinance on Lending and Guarantees (2011:211) contains provisions associated with the Budget Act and regulates in more detail the government agencies' guarantee and lending operations, including the Debt Office's operations. The Ordinance states that the Debt Office is to assess and evaluate the financial risks that a guarantee commitment or loan entails for the central government and ensure that the matter is subject to financially responsible consideration and management.

The Debt Office shall also apply EU regulations stating that state aid that distorts competition in the internal market is not permitted. State aid is, therefore, not permitted in most activities. To prohibit a guarantee from containing a support component, a fee must instead be based on a market price

and be paid by the guarantee holder. However, in some areas, state aid is permitted (for example, employment aid and support for small and medium-sized enterprises).

Since 2011, the Debt Office has been tasked with conducting a risk analysis of the complete portfolio of central government guarantees and loans. The analysis is conducted in cooperation with the other government guarantee and lending agencies. The analysis includes both a credit risk perspective and a liquidity risk perspective and is presented annually to the Government in a report no later than 15 March.

Since 2013, the Debt Office has also been assigned to assist Sida in valuation and pricing of guarantees issued by Sida as part of its development work.

Decisions by the Debt Office

Strategic decisions are made by the Board and operational decisions by the Debt Office Director General or other officials in accordance with the rules of procedure of the Debt Office and the relevant departments.

Objective

The Government stipulates the objectives of the guarantee and lending operations in the Debt Office's appropriation directions as follows:

- The Debt Office shall strive to limit the risk to the central government and safeguard the position of the central government. This is to be done through the evaluation of financial risks, setting fees, determining appropriate conditions and collecting claims.
- The Debt Office is to work actively to contribute to the efficient performance of the guarantee and lending operations of other agencies under the Government.
- The Debt Office is to continue to develop the management of central government guarantees and loans in cooperation with the other agencies concerned.

Principles for management of guarantees and loans

The purpose of the principles is to specify/provide guidance on how the Debt Office will issue guarantees and loans within the frameworks set by the Budget Act, government ordinances and other regulations in force, and decisions by the Riksdag and the Government.

- The Debt Office is to work for a design of guarantees and loans that allows the expected losses to be estimated reliably. If the guarantees or loans are designed in such a way that the expected loss cannot be estimated reliably, these commitments shall not be handled within the guarantee and lending model.
- A market price shall be charged when state aid is not permitted under EU rules.
- The Debt Office is to ensure that the expected loss in guarantees and loans is determined in an unbiased way.
- When evaluating credit risk, the Debt Office shall use methods regarded as best practice, mainly rating methodology where appropriate.
- The methods and specific models used by the Debt Office are to be evaluated on a continual basis.
- The evaluation shall focus on material risks in the operations.

- The handling of recourse claims and problem commitments is to be guided by the principles of commercial judgment and equal treatment of debt. The Debt Office is to demand repayment based on an assessment of the debtor's ability to pay. The Debt Office may discharge a claim, in whole or in part, if it is evidently unreasonable to demand payment, or otherwise, if there is sufficient commercial rationale for doing so. In light of the Debt Office's shrinking portfolio of small recourse claims, efforts shall be made to achieve a balance between the cost of management and the expected recovery values.

Reporting to the Board

The unit Guarantees and lending reports on the Debt Office guarantee and lending portfolio annually, or when required, to the Board. Its reporting shall focus on the larger and more complex risks in the portfolio. In addition, the Board shall be informed of the material changes in risk that the Debt Office is obligated to report to the Ministry of Finance and of the outcome of the internal risk monitoring process.

5 Nuclear waste management financing process

General framework

Those with a permit to conduct nuclear activities, as issued to nuclear power stations and other facilities under Act (1984:3) on Nuclear Activities (the Nuclear Act), are given the designation "permit holders" and are obligated to implement and finance the measures required to ensure the safe management and final storage of the operation's residual products. Permit holders shall also carry out and finance the safe decommissioning of facilities and demolition after operations have ceased.

Each permit holder has full liability for all its costs. This is regulated by the Financing Act (Act [2006:647] on Financial Measures for the Management of Residual Products from Nuclear Activities) and the Financing Ordinance (Ordinance [2017:1179] on Financial Measures for the Management of Residual Products from Nuclear Activities). The system was created so that nuclear waste management will be financed by the nuclear power industry instead of by taxpayers.

Permit holders are required to pay a *nuclear waste fee* to the Nuclear Waste Fund. The fee will be determined every three years for the coming three-year period. The fee level is calculated individually for each permit holder so that the estimated total future fees, together with the reserved funds, correspond to the estimated total future costs for the permit holder. The fee is charged in the form of a specific amount per kWh of electricity supplied by a permit holder. The fee may also be set as an annual amount in SEK, such as in the case of a party that is required to pay fees but no longer produces electricity. The Government determines the size of the fee following a proposal by the Debt Office.

The fees are paid to the Nuclear Waste Fund, which is a government authority with its own board but no employees. Each permit holder has a share in the Fund. The Fund's capital is invested in the financial markets. Those who are required to pay a nuclear waste fee shall also pledge collateral to the central government for the costs that the fee will cover, but which are not covered by the paid-in and reserved funds (*financing amount*). For nuclear power stations, additional collateral shall be provided as a supplement to the financing amount in order to enable a high probability that the obligations can be fulfilled (*supplementary amount*).

The Government decides whether the collateral proposed by permit holders is acceptable after the Debt Office has issued its opinion on the permit holders' proposals. If necessary, to

ensure the state's right, the Debt Office is to propose the conditions that apply to the collateral. The Debt Office shall also monitor the long-term stability of the value of the pledged collateral and notify the Government of any significant decline in value. The Debt Office may also propose additional collateral. The Government shall be notified in the event the Debt Office deems it necessary to claim collateral.

Decisions by the Debt Office

Strategic decisions are made by the Board and operational decisions by the Debt Office Director General or other officials in accordance with the rules of procedure of the Debt Office and the relevant departments.

Objective

The Financing Act states that:

- The nuclear waste fee shall ensure the financing of the permit holder's share of the total remaining costs.
- The financing amount shall be set to correspond to the difference between, on the one hand, the expected remaining basic costs and additional costs incurred for any residual products that have arisen when the calculation is made and, on the other hand, the permit holder's share in the Nuclear Waste Fund.
- The supplementary amount shall be set at the amount that, together with the financing amount and the reactor owner's share in the Nuclear Waste Fund, allows the reactor owner to fulfil its obligations, even if no additional nuclear waste fees are paid and no additional collateral is provided.

The Financing Ordinance states that:

- The Debt Office shall, taking account of the outcome of the consultative procedure, submit a proposal to the Government on the nuclear waste fee and the financing and supplementary amounts to be applied in the coming contribution period.

Principles for calculating and proposing the nuclear waste fee, financing and supplementary amounts, as well as assessment of the acceptability of collateral

The principles for calculating the nuclear waste fee, financing and supplementary amounts, as well as certain key assumptions, are regulated by the Financing Act and the Financing Ordinance, see above. These rules must be adhered to. The basis for financing the management of

residual products, and for the work of the Debt Office, is that the nuclear power industry shall bear the costs instead of taxpayers.

The Debt Office assesses the design and strength of the proposed collateral and presents its opinion to the Government. Certain principles for the design of the collateral are regulated by the Financial Ordinance. The Debt Office's assessment of the strength of the collateral is based on an estimation of the long-term stability of its value. In order to strengthen the long-term value of collateral, the Debt Office may propose the imposition of certain conditions.

Reporting to the Board

The financing system's financial position shall be reported annually and, if necessary, to the Board. The reporting is to focus on changes in relation to nuclear waste fees and collateral, as well as changes in the system's risk profile.

Prior to submitting a proposal on nuclear waste fees, financing amounts and supplementary amounts, the Board shall be informed of the work and the considerations on which the Debt Office's position is based.

6 Credit risk

The purpose of rules and limits for credit risks is to set requirements that must be met before transactions are entered into, in order to limit the credit risk, and also to manage credit risks on outstanding transactions.

Calculation methods, see Appendix 3.

Reporting to the Board

Breaches of limits and monitoring limits shall be reported.

6.1 Management and payment of central government debt process

6.1.1 Counterparty default risks

Rating requirements

These requirements cover OTC derivative transactions and short-term investments.

The counterparty's long-term rating has to be at least A-.

If the counterparty's credit rating is downgraded to below A-, new transactions with the counterparty are only allowed after a decision by the Debt Office Director General in order to reduce the risk. On the basis of a trade-off between cost and risk, outstanding transactions may be maintained following a decision by the Director General. The decision is reconsidered if further downgrades of individual credit ratings occur. These decisions are reported back to the Board.

For counterparties in short-term investments, a short-term credit rating can be used if the counterparty has no long-term credit rating. In that case, the short-term credit rating is translated into the equivalent long-term credit rating. As the short-term and long-term rating scales cannot be translated one-for-one, the short-term credit rating is translated to the lowest equivalent long-term rating. The limits shall then correspond to the limits set for the translated long-term credit rating.

Central counterparty clearing, OTC instruments

Only central counterparties (CCPs) authorised under European Parliament and Council Regulation 648/2012 may be engaged for central counterparty clearing.

No rating requirements and no limits are set for CCPs.

The Debt Office's internal regulations for initial counterparties contain specific regulations for each CCP the Debt Office affiliates to.

The use of central counterparty clearing requires no ISDA and CSA for either the CCP or the initial counterparty.

OTC derivative transactions

Contractual requirements

ISDA agreements with a downgrading clause ("rating trigger") and Credit Support Appendix (CSA) are required before OTC derivative transactions may be entered into and remain in the portfolio.

The Debt Office's CSA agreements must include a clause on mutual threshold values set at zero.⁷ Temporary deviations from the thresholds are permitted for practical reasons.

Market requirement and maximum maturity

Transactions are conducted in well-developed markets and in maturities with good liquidity. The maximum maturity is up to and including 20 years.

Short-term investments

Maximum maturity

The maximum maturity is up to and including 12 months.

⁶ This requirement applies to contracts entered into after 23 May 2017.

Table 2. Limits, short-term investments

Credit rating	Maximum exposure per counterparty according to base limit* (SEK million)	Maximum exposure per counterparty according to extended limit** (SEK million)	Maximum maturity
AAA	8 000	20 000	Dependent on instrument
AA+ to AA-	5 500	15 000	Dependent on instrument
A+ to A	3 000	10 000	Dependent on instrument
A-	1 500	5 000	Five banking days

* Applies in normal circumstances.

** Applies for a limited period of time. Decision on use made by the Debt Office Director General.

Extra scope for overnight (O/N) investments

The extra scope for O/N investments is a maximum of SEK 25 billion per counterparty (including the short-term investment limit) for the five largest banks in the Swedish market, and a maximum of SEK 6 billion per counterparty (including the short-term investment limit) for other RIX participants. The sum of all counterparties' utilised extra scope for O/N investments may not exceed SEK 25 billion. The Debt Office Director General can, if necessary, decide on temporary expansion of the aggregate extra scope for total O/N investments.

Counterparties that can be approved for extra O/N scope are RIX participants, provided that they fulfil the conditions set for short-term investment counterparties.

Reporting to the Board

The Board is to be kept informed of the counterparties that have been granted an O/N extra limit and the size of the limit.

Decisions on temporary expansion of the aggregate extra scope for total O/N investments are to be reported to the Board.

Extended limit for investments in other states

Rating requirements

The country's rating has to be AAA.

Country requirements

Investments under the extended limit can be made in countries in the euro area and the UK, Denmark and Norway.

Maximum maturity

The maximum maturity under the extended limit is up to 4 months.

Limit

SEK 50 billion per country.

6.1.2 Settlement risk

To manage settlement risk, the Debt Office will endeavour, where possible, to achieve settlement on the principles of Delivery Versus Payment (DVP) or Payment Versus Payment (PVP).

6.1.3 Country risk

Short-term investments and OTC derivatives may only be entered into with counterparties from a country with a long-term sovereign credit rating of at least A-. When approving new investment and/or OTC-derivative counterparties, the counterparty's country of domicile is also taken into account, for instance in regard to international sanctions in which Sweden participates.

6.2 Central government liquidity management process

Contractual requirements

The framework agreements have to include principles and measures to limit account balances O/N in accounts under the Treasury Single Account at the Riksbank and in foreign currency accounts.

The framework agreements have to contain a right for the agency to terminate the agreement if the bank is downgraded ("downgrading clause"), suspends payments, applies for a company reorganisation, enters liquidation or is declared bankrupt.

Rating requirements

The long-term rating of the framework agreement bank has to be at least A- when the agreement is entered into.

Maximum maturity

The maximum maturity is O/N.

Monitoring limit

The Debt Office sets the monitoring limits for account balances.

Account balances during the day

To keep account balances during the day to a minimum, several settlements are carried out during the day between each framework agreement bank and the Debt Office. The risk at each settlement is to be kept to a minimum by, whenever possible, netting incoming and outgoing payments.

Maximum withdrawal amounts

A government agency must decide the maximum withdrawal amount for bank accounts that are linked to the Debt Office's top accounts in the framework agreement banks and thereby to the Treasury Single Account at the Riksbank.

6.3 Exceptions

Swedish government agencies, the AP Funds and the Riksbank are regarded as risk-free counterparties and therefore not subject to limits.

Appendix 1 – Risk map

The risk map shows the main types of risks identified within the framework of the Debt Office's operations.



Appendix 2 – Definitions

In these definitions, the term *loss* refers to negative effects on finances, reputation and/or operations.

Business risk

Business risk is the risk of a loss due to factors in the external business environment, such as lower demand for products or services.

Settlement risk

Settlement risk is the risk that one party will not fulfil its undertakings at the time of settlement, i.e. will not deliver currency or securities after the other party has already fulfilled its undertakings.

Financing risk

Financing risk is the risk that it will be difficult and/or expensive to raise new financing.

Inflation risk

Inflation risk is the risk of a loss in nominal terms due to higher-than-expected inflation.

Concentration risk

Concentration risk is the risk of a larger loss due to a concentration on individual and/or correlated risk factors.

Credit risk

Credit risk is the risk that a loss will arise because a counterparty does not fulfil its obligations and the risk that a loss of value will arise from impaired credit quality. Credit risk includes settlement risk, counterparty default risk, country risk and systemic risk.

Country risk

Country risk is a group of risks associated with doing business with a counterparty in a particular country. These risks mainly refer to the ability of a country to meet its external obligations, expectations about the general development of the economy in the country, political stability and the legislative environment of the country.

Liquidity risk

Liquidity risk is the risk of not being able to meet payment obligations as they fall due without a substantial increase in the cost of obtaining means of payment. Liquidity risk includes financing risk, refinancing risk and market liquidity risk.

Market risk

Market risk is the risk of a loss due to unfavourable price movements in the market. Market risk includes interest rate risk, currency risk and inflation risk.

Market liquidity risk

Market liquidity risk is the risk that it will not be possible to realise or cover a position at the current market price because the market is not deep enough or is not functioning as the result of some disturbance.

Counterparty default risk

Counterparty default risk is the risk that the counterparty in a transaction will not fulfil its obligations. Settlement risk is a form of counterparty default risk.

External risk

External risk is the risk of a loss due to changes outside the Debt Office, for example changes in the (geo-)political or (global) economic situation.

Operational risk

Operational risk is the risk of loss due to inadequate or failed processes, people, systems or external events. Legal risks are part of operational risks.

Refinancing risk

Refinancing risk is the risk that it will be difficult and/or expensive to replace maturing loans.

Interest rate risk

Interest rate risk is the risk that the value of assets and liabilities will change in an unfavourable way when levels of interest rates change.

Strategic risk

Strategic risk is the risk of a loss due to misdirected strategic decisions and/or as the result of strategic decisions not having the intended effect.

Systemic risk

Systemic risk entails the risk that problems affecting one or more participants spread to other parties and cause general problems in the financial system.

Currency risk

Currency risk is the risk that the value of assets and liabilities will change in an unfavourable way when currency exchange rates change.

Appendix 3 – Certain calculation methods

Maturity of the central government debt

The Government has decided that the maturity of the central government debt is to be measured as duration. Its duration is expressed as Macaulay duration.

For an individual instrument, Macaulay duration describes the average remaining time to maturity by weighting the time to each cash flow (coupon and principal) by the cash flow's share of the present value. For a portfolio, for example a debt type, Macaulay duration is calculated as the present value-weighted sum of the individual instruments' Macaulay duration.

Macaulay duration can be calculated in various ways. The Debt Office has chosen to calculate Macaulay duration on the basis of an approximation of modified duration. Modified duration can be converted to Macaulay duration using the following formula:

$$Dur_{\text{Macaulay}} = Dur_{\text{Modified}}(1 + r_{\text{YTM}})$$

For instruments with complex cash flow structures, the yield may be undefined, and thus modified duration cannot be converted to Macaulay duration. In those cases, Macaulay duration is replaced by modified duration.

Modified duration for an individual instrument is calculated on the basis of dollar duration. Dollar duration shows how the market value for an instrument is affected by a small interest rate change. Instead of calculating the dollar duration analytically, the measure is approximated.

Credit risks

The calculation of exposures in Over the Counter (OTC) derivative transactions is based on the market value, taking account of netting in accordance with ISDA agreements.

Value-at-Risk (VaR)

VaR is a method of calculating risks in a portfolio. This is done by taking account of different risk factors and how they affect one another and the portfolio. The risk factors currently used by the Debt Office are currency and 18 maturity intervals. As the Debt Office uses eight currencies in active management, this becomes a total of 152 (8x19) factors to take into account.

The method used by the Debt Office was developed by JP Morgan and has become the industry standard for measuring

financial risks. There are, however, still possibilities to make in-house interpretations and adaptations of the method.

The main steps in the method are:

1. Calculate the variation for each factor's result on a daily basis.
2. Weight them together exponentially to get a kind of average. Exponential weighting means that different weights can be attached to events that are close in time in relation to earlier events. The Debt Office uses a weighting factor (decay) of 98%.
3. Calculate the covariance between the factors (correlations).
4. Allocate the portfolio's cash flows to the different maturity factors.
5. Calculate the total VaR value for the portfolio, taking account of the correlations calculated in step four and a confidence interval. The Debt Office uses a 95 per cent unilateral confidence interval.

One interpretation of the VaR value is that there is only a 5 per cent risk of incurring a loss that is greater than the VaR value calculated.

The Debt Office continually monitors (back-tests) how this matches up with reality and has presented this in recent years' annual reports.

Calculation of interest rate risk limits in the continual position taking

The limit set for interest rate risk in the continual position taking is expressed as a percentage. This is because the mandates in continual position taking have different portfolio sizes and limits are therefore set as a maximum ratio of interest rate risk measured in kronor to the size of the portfolio, i.e. limit is expressed as a percentage of portfolio size. Assume, for example:

- a portfolio size of SEK 200 billion
- a limit of ± 0.9 per cent the size of the portfolio, i.e. the limit is SEK 1.8 billion kronor

- an interest rate position with a size of SEK 1 billion in dollar duration

- 0.5) is left. This corresponds to 0.4 per cent * SEK 200 billion = SEK 0.8 billion.

The ratio will then be SEK 1 billion/SEK 200 billion = 0.5 per cent. This is deducted from the limit. Then 0.4 of the limit (0.9

Appendix 4 – References

Supporting material for the Financial and Risk Policy

The supporting material sets out analyses, discussions and reasons for amendments to the Financial and Risk Policy. The following is a list of the supporting material as of 2006 (i.e. the year when the first Financial and Risk Policy was adopted) with a description of the main content of the documents.

Supporting material for 2021

Main content: Decision on the foreign currency target value for 2021, change in the term-to-maturity interval for the nominal krona debt, changed reporting of retail market borrowing, and decision to remove the section “Operational Risks” from the Financial and Risk Policy. In addition, a number of minor changes. (Supporting material for the adoption of the Debt Office’s Financial and Risk Policy 2021, Reg. No. 2020/992.) Board decision, 09/12/2020.

Amendment in 2020

Decision to change the term-to-maturity interval for the nominal krona debt as a result of a sharp upward revision of the net borrowing requirement. Board decision, 13/05/2020.

Decision on increased maximum limit for short-term investments. The increase applies to the extended exposure limit per counterparty on which the Debt Office Director General can decide. Board decision, 31/03/2020.

Supporting material for 2020

Main content: Unchanged exposure of the foreign currency debt as well as decision on the foreign currency target value for 2020. A clarification on the monitoring and reporting of the foreign currency debt has been introduced. Also, delegation of the decision to the Debt Office Director General regarding temporary expansion of the aggregate extra scope for O/N investments. In addition, a number of minor changes. (Supporting material for the adoption of the Debt Office’s Financial and Risk Policy 2020, Reg. No. 2019/1010). Board decision 11/12/2019.

Supporting material for 2019

New foreign currency benchmark based on multi-annual method. The chapter on retail market borrowing has been removed and replaced by item 2.5. A new chapter on nuclear waste financing has been added. Changes of an editorial nature. (Supporting material for the adoption of the Debt

Office’s Financial and Risk Policy 2019, Reg. No. 2018/1135.) Board decision, 14/12/2018.

Amendment in 2018

Changes in Section 2.4 Position-taking. See supporting material “Changes in Section 2.4 – the Debt Office’s Financial and Risk Policy 2018 – to the Board in May 2018”.

Minor changes in the introduction. Board decision, 14/02/2018.

Supporting material for 2018

New foreign currency benchmark. Otherwise, a number of minor changes. (Supporting material for the adoption of the Debt Office’s Financial and Risk Policy 2018, Reg. No. 2017/1021.) Board decision, 11/12/2017.

Amendment in 2017

Decision to reduce the threshold values in the Debt Office’s CSA agreements. According to the decision, the threshold values will be mutually zero regardless of credit rating. Board decision, 23/05/2017.

Decision to change the foreign currency benchmark for 2017. Board decision, 17/02/2017.

Decision regarding adjustment in Section 2.3 Exchanges between Swedish kronor and foreign currency due to the introduction of the multi-currency cash pool structure. The adjustment refers to how the exchange path is determined. Board decision, 17/02/2017.

Supporting material for 2017

Main content: Introduction of the central government multi-currency cash pool structure and the alteration of the foreign currency benchmark for 2017. Also, a number of minor changes. (Supporting material for the adoption of the Debt Office’s Financial and Risk Policy 2017, Reg. No. 2016/1069.) Board decision, 13/12/2016.

Amendment in 2016

Decision to remove the chapter “Financial stability and consumer protection process” from the Financial and Risk Policy. Board decision, 19/02/2016.

Decision to amend the risk map and associated definitions. Board decision, 23/05/2016.

Supporting material for 2016

Main content: Amendment of the foreign currency benchmark for 2016 and clarification regarding the handling of outstanding transactions with a counterparty that is downgraded below A-. Also, a number of minor changes. (Supporting material for the adoption of the Debt Office's Financial and Risk Policy 2016, Reg. No. 2015/959.) Board decision, 14/12/2015.

Amendment in 2015

Decision to amend the maturity interval for the nominal krona debt as a result of substantial declines in market interest rates. Government decision 12/03/2015, following a proposal from the Board of the Debt Office dated 18/02/2015.

Decision on clarification in Section 2.2 regarding deviation intervals for the maturity of the nominal krona debt and inflation-linked krona debt. Board decision, 18/02/2015.

Supporting material for 2015

Main content: Reduction of the exposure of central government debt in foreign currency and new foreign currency benchmark. Otherwise, a number of minor changes. (Supporting material for the adoption of the Debt Office's Financial and Risk Policy 2015, Reg. No. 2014/1400.) Board decision, 11/12/2014.

Amendment in 2014

Decision on supplementary text in Section 2.2.3 Foreign currency debt that, for practical reasons, permits minor exposures to foreign currencies and interest rates not included in the benchmark. Board decision, 15/09/2014.

Decision on supplementary text in Section 7.1.2 OTC derivative transactions, clarifying that temporary overruns of the thresholds are permitted. The decision also includes the removal of Footnote 5 in the same section. Board decision, 19/05/2014.

Supporting material for 2014

Main content: Amendments to principles for management of the Deposit Guarantee Fund. Mainly extended maturity of investments and repos. (Supporting material for adoption of the Debt Office Financial and Risk Policy 2014, Reg. No. 2013/268.) Board decision, 11/12/2013.

Amendment in 2013

Decision on regulations for financial instruments centrally cleared at Nasdaq OMX (Amendment to Financial and Risk Policy – internal regulations for financial instruments centrally cleared at Nasdaq OMX, Reg. No. 2013/1064.) Board decision, 22/05/2013.

Supporting material for 2013

Main content: A number of changes in the sections on the processes: Management and payment of central government debt, Central government liquidity management, Guarantee and lending (including increased reporting requirements) and Financial stability and consumer protection. In the section on credit risks: Review of overnight (O/N) limit, settlement risk, participation in issues etc. and country risk. (Supporting material for the adoption of the Debt Office's Financial and Risk Policy 2013, Reg. No. 2012/1730.) Board decision, 12/12/2012.

Amendment in 2012

Decision on deviation interval for the nominal krona debt and the inflation-linked krona debt (Amendment to Financial and Risk Policy 2012, Reg. No. 2012/1045). Board decision, 23/05/2012.

Supporting material for 2012

Main content: Use of short-term rating, clarification regarding exception for exceeding limits, discussion of the term "material" ("väsentlig"), etc. (see supporting material for adoption of the Debt Office's Financial and Risk Policy 2012, Reg. No. 2011/1963.) Board decision, 15/12/2011.

Amendment in 2011

Alteration of limit structure for short-term investments (Proposed change in the Debt Office's Financial and Risk Policy 2011, Reg. No. 2011/1696). Board decision, 14/09/2011.

Supporting material for 2011

Main content: In the Debt management and payments process, an alteration was made to the interest rate re-fixing period of the nominal krona debt, the maturity target for the inflation-linked debt was altered, the wording of decisions on position taking was altered and the VaR mandate was reduced. Some alterations were also made in the section on the Guarantee and lending process (Reg. No. 2010/1831) Board decision, 15/12/2010.

Supporting material for 2010

Main content: "Support to credit institutions" was included in the policy, and questions relating to investment operations for the deposit guarantee scheme were included in the section on the Guarantee and lending process (Reg. No. 2009/1565) Board decision, 16/12/2009.

Amendment in 2009

Alteration of the target for the nominal krona debt interest rate re-fixing period (Reg. No. 2009/686) Board decision, 14/04/2009.

Supporting material for 2009

Main content: Alteration of the currency distribution in the foreign currency benchmark, delegation of previous Board decisions in external active management, amendment of, and supplement to, principles for management of guarantees and credits and principles for central government liquidity management.

Amendments in 2008

Temporary alteration of the mandate for currency exchanges. (Proposal for temporary alteration to the mandate for currency exchanges, Reg. No. 2008/621.) Board decision, 16/04/2008.

Introduction of composition benchmarking for the foreign currency debt. (Reg. No. 2008/1302.) Board decision, 28/08/2008.

Alterations to exchanges between Swedish kronor and foreign currency. (Reg. No. 2008/1636.) Board decision, 21/10/2008.

Supporting material for 2008

Main content: The central government's internal bank and the retail market were included in the Financial and Risk Policy, discussion of steering the share of inflation-linked debt, the maturity of the inflation-linked debt. (Supporting material for decision to adopt the Financial and Risk Policy 2008, Reg. No. 2007/1869.) Board decision, 06/12/2007.

Amendment in 2007

Extended limit for short-term investments with other states. (Proposed amendment to the Debt Office's Financial and Risk Policy 2007, Reg. No. 2007/1655.) Board decision, 17/10/2007.

Supporting material for 2007

Main content: Distribution of the maturity of the debt, methods of calculating shares of debt, steering and reporting of the share of inflation-linked debt, position taking by the Debt Office, principles for the guarantees and credits branch of operations, the regulatory framework for counterparty default risks. (Supporting material for decision to adopt the Financial and Risk Policy 2007, Reg. No. 2006/02015.) Board decision, 07/12/2006.

Amendment in 2006

Extension of temporary limits on the overnight market. (Proposed amendment of the Debt Office's Financial and Risk Policy 2006, Reg. No. 2006/01158.) Board decision, 16/06/2006.

Supporting material for 2006

Main content: Risk management at the Debt Office, principles for debt and market maintenance, distribution of the maturity of the nominal debt, currency composition in the foreign currency debt, share of inflation-linked debt, calculation and reporting of the interest rate re-fixing period of the nominal krona debt, temporary credit limits on the overnight loan market. (Supporting material for decision to adopt the Financial and Risk Policy 2006, Reg. No. 2005/02408.) Board decision, 08/12/2005.

Board decisions before 2006 included in the Financial and Risk Policy – 2006

Before the Financial and Risk Policy was introduced (i.e. before 2006), the Board took separate decisions on particular issues. These older decisions were included in the first Financial and Risk Policy.



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