

# Minimum requirement for own funds and eligible liabilities (MREL)

Compliance Q4 2022



## Foreword

The Swedish National Debt Office – Sweden’s resolution authority – publishes a quarterly report on the Swedish systemically important banks’ and other institutions’ (institutions) compliance with the minimum requirement for own funds and eligible liabilities (MREL).<sup>1</sup> MREL is to ensure that a financial institution maintains both a sufficient level of own funds and of liabilities that can be written down or converted into equity so that, if resolution were to become necessary, the viability of that institution could be restored. In this report, we show how well the institutions complied with MREL at the end of the fourth quarter of 2022.<sup>2</sup>

In accordance with the Swedish Resolution Act (2015:1016), the Debt Office sets MREL annually.<sup>3</sup> The statutory amendments that entered into force on 1 July 2021 entail that MREL is to be phased in by 1 January 2024. To enable a linear build-up of MREL, including subordination requirements, until the 1 January 2024 deadline, the Debt Office has set target levels that apply as of 1 January 2022.<sup>4</sup> For informational purposes, this report also presents compliance in relation to the requirements that will apply starting 1 January 2024.<sup>5</sup>

Further information about MREL and its application for Swedish institutions is available in the Debt Office’s MREL policy and on its website.<sup>6</sup> The In-depth part on pages 12–13 provides a general description of how the requirements are calculated and met.

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<sup>1</sup> The formal definition of institutions includes *credit institutions* as well as certain *investment firms* (see Chapter 2, Section 1 of the Resolution Act [2015:1016]).

<sup>2</sup> This report is based on information provided by the institutions to the Debt Office on 18 February 2022.

<sup>3</sup> The requirements presented in this report were set in December 2021 ([see the Debt Office’s website](#)). As of the time of those decisions, in line with previous years there are nine Swedish institutions that are deemed systemically important.

<sup>4</sup> Older versions (up to and including 31 December 2021) of the Debt Office’s quarterly MREL report thus show compliance based on a previous configuration of MREL.

<sup>5</sup> Because MREL is set annually, the exact levels of the requirements that will apply starting 1 January 2024 could vary due to potential changes to the institutions’ capital requirements (including the combined buffer requirement).

<sup>6</sup> *MREL policy: Minimum requirement for own funds and eligible liabilities (MREL)* from 13 October 2021 (Reg. no. RGR 2021/26). See also the accompanying decision memorandum: *Minimum requirement for own funds and eligible liabilities (MREL)* from 13 October 2021 (Reg. no. RGR 2021/26).

## Summary

- At the end of the fourth quarter of 2022, all systemically important institutions met the MREL set for them. This means that the institutions reached the target levels for the risk-based and non-risk-based MREL that apply as of 1 January 2022.
- All institutions also had a sufficient amount of own funds and subordinated liabilities for the target levels of the subordination requirement.
- MREL is to be phased in by 1 January 2024. On 31 December 2022, the systemically important institutions had issued SEK 198 billion in subordinated liabilities. Accordingly, institutions reporting a shortfall will need to issue a further SEK 7 billion in subordinated liabilities in order to meet the subordination requirements that will apply as of 1 January 2024.

## Compliance with MREL

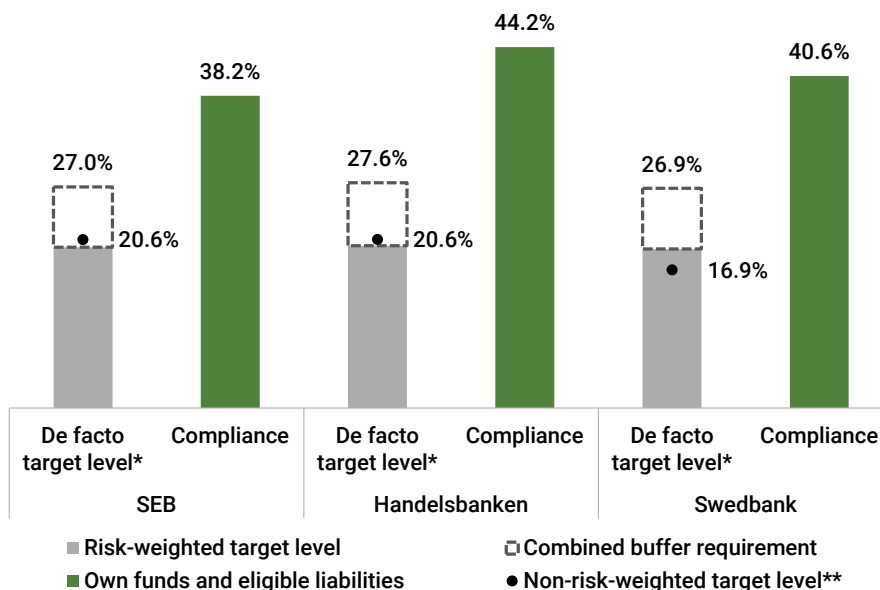
MREL consists of a risk-weighted and non-risk-weighted requirement. Both requirements apply and are to be met independently of each other. MREL is being phased in and will apply in full as of 1 January 2024. To ensure a linear build-up until then, the Debt Office has decided on target levels for MREL that apply as of 1 January 2022. The institutions' compliance with target levels and MREL, including the subordination sub-requirement, is shown in the figures below. See the In-depth part on pages 12–13 for more about how the requirements are calculated and met.

Figures 1 and 2 show compliance with the target levels for MREL that apply as of 1 January 2022. The risk-weighted target level consists of the actual target level plus the combined buffer requirement, thereby forming the "de facto" target level. The non-risk-weighted target level amounts to 5 per cent of the leverage ratio exposure measure (LRE) for all institutions. To enable comparison between the target levels, the non-risk-weighted target level is recalculated from per cent of LRE to per cent of the total risk-weighted exposure amount (TREA). The figures thereby show compliance (right column for each institution) in relation to the de facto risk-weighted target level and non-risk-weighted target level (left column for each institution).

Figures 1 and 2 show that all systemically important institutions reached the target levels for MREL at the end of the fourth quarter of 2022.

**Figure 1 Compliance with target level for MREL, 2022-12-31 – major banks**

Per cent of TREA

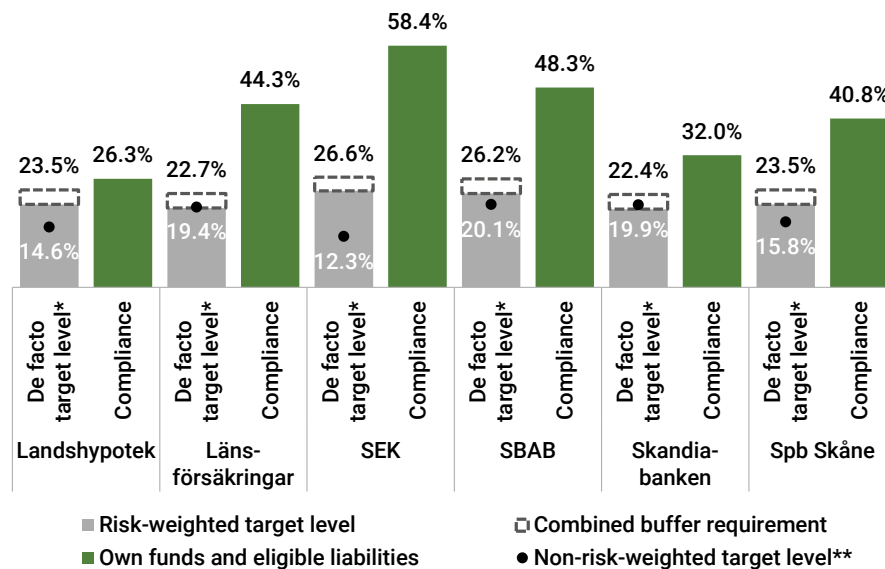


Note: \*The de facto target level consists of the risk-weighted target level plus the combined buffer requirement (see also the In-depth part on pages 12–13). \*\*The non-risk-weighted target level is recalculated to per cent of TREA.

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

**Figure 2 Compliance with target level for MREL, 2022-12-31 – medium-sized institutions**

Per cent of TREA



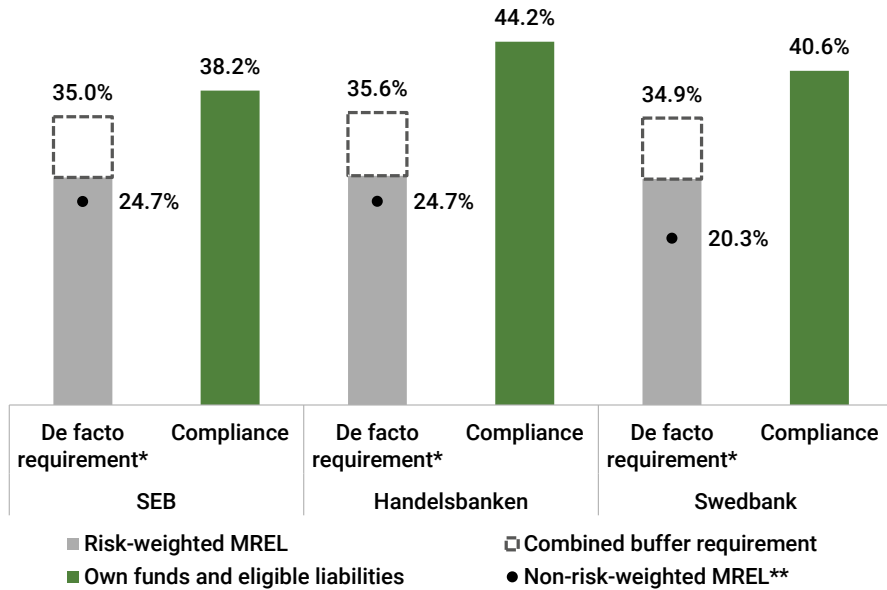
Note: \*The de facto target level consists of the risk-weighted target level plus the combined buffer requirement (see also the In-depth part on pages 12–13). \*\*The non-risk-weighted target level is recalculated to per cent of TREA.

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

Figures 3 and 4 show indicative compliance with MREL that will apply as of 1 January 2024. The risk-weighted requirement consists of the actual requirement plus the combined buffer requirement. The non-risk-weighted requirement amounts to 6 per cent of LRE for all institutions. To enable comparison between the requirements, the non-risk-weighted requirement is recalculated from per cent of LRE to per cent of TREA. The figures thereby show compliance (right column for each institution) in relation to the de facto risk-weighted target level and non-risk-weighted target level (left column for each institution).

Figure 3 Indicative compliance on 2022-12-31 with MREL that will apply as of 2024 – major banks

Per cent of TREA

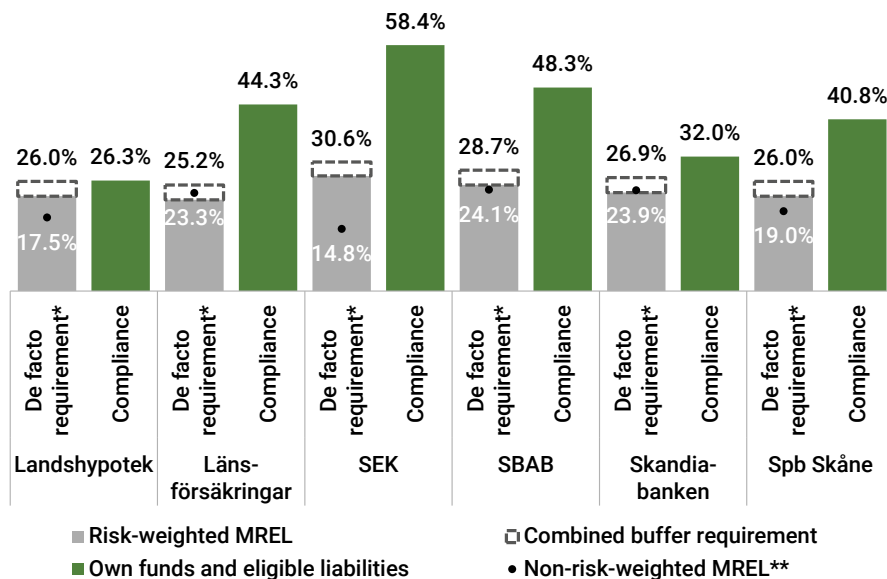


Note: \*The de facto target level consists of the risk-weighted target level plus the combined buffer requirement (see also the In-depth part on pages 12–13). \*\*The non-risk-weighted target level is recalculated to per cent of TREA.

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

Figure 4 Indicative compliance on 2022-12-31 with MREL that will apply as of 2024 – medium-sized institutions

Per cent of TREA



Note: \*The de facto target level consists of the risk-weighted target level plus the combined buffer requirement (see also the In-depth part on pages 12–13). \*\*The non-risk-weighted target level is recalculated to per cent of TREA.

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

## Subordination sub-requirement

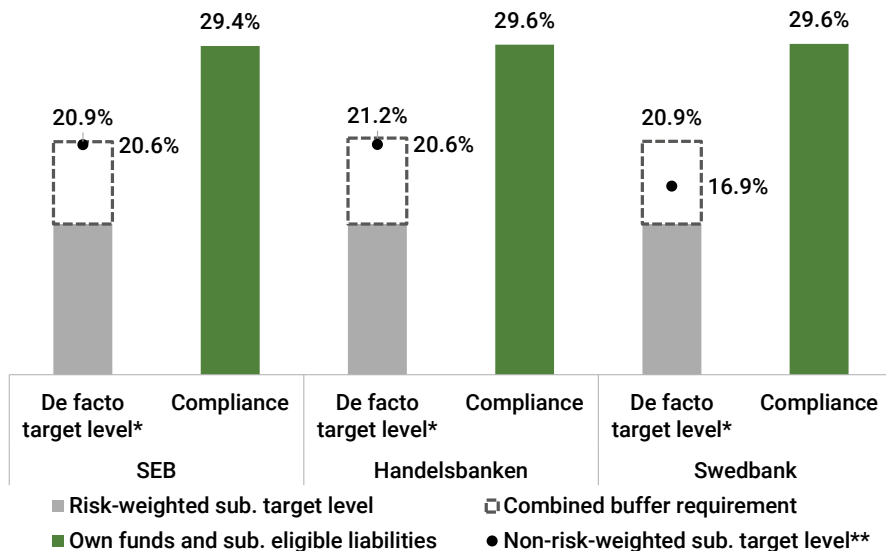
Parts of MREL, in accordance with the so-called subordination sub-requirement, may only be met with own funds and subordinated eligible liabilities.

Figures 5 and 6 show compliance with the target levels for the subordination requirement that apply as of 1 January 2022. The risk-weighted target level consists of the actual requirement plus the combined buffer requirement. For all institutions, the non-risk-weighted target level for subordination amounts to 5 per cent of LRE. To enable comparison between the requirements, the non-risk-weighted requirement is recalculated from per cent of LRE to per cent of TREA. The figures thereby show compliance (right column for each institution) in relation to the de facto risk-weighted target level and non-risk-weighted target level (left column for each institution).

Figures 5 and 6 show that all systemically important institutions met the target levels for subordination at the end of the fourth quarter of 2022.

**Figure 5 Compliance with target level for subordination requirement, 2022-12-31 – major banks**

Per cent of TREA

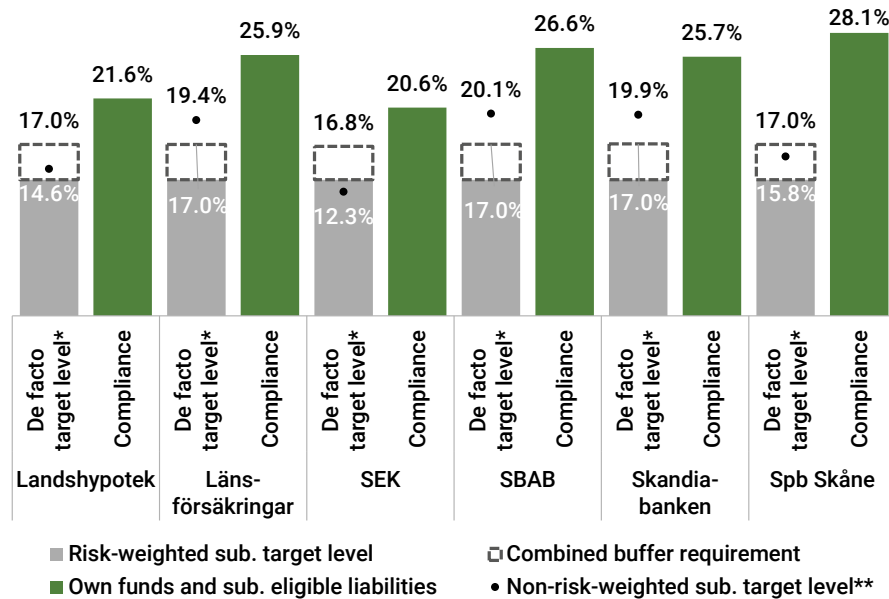


Note: \*The de facto target level consists of the risk-weighted target level plus the combined buffer requirement (see also the In-depth part on pages 12–13). \*\*The non-risk-weighted target level is recalculated to per cent of TREA.

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

**Figure 6 Compliance with target level for subordination requirement, 2022-12-31 – medium-sized institutions**

Per cent of TREA



Note: \*The de facto target level consists of the risk-weighted target level plus the combined buffer requirement (see also the In-depth part on pages 12–13). \*\*The non-risk-weighted target level is recalculated to per cent of TREA.

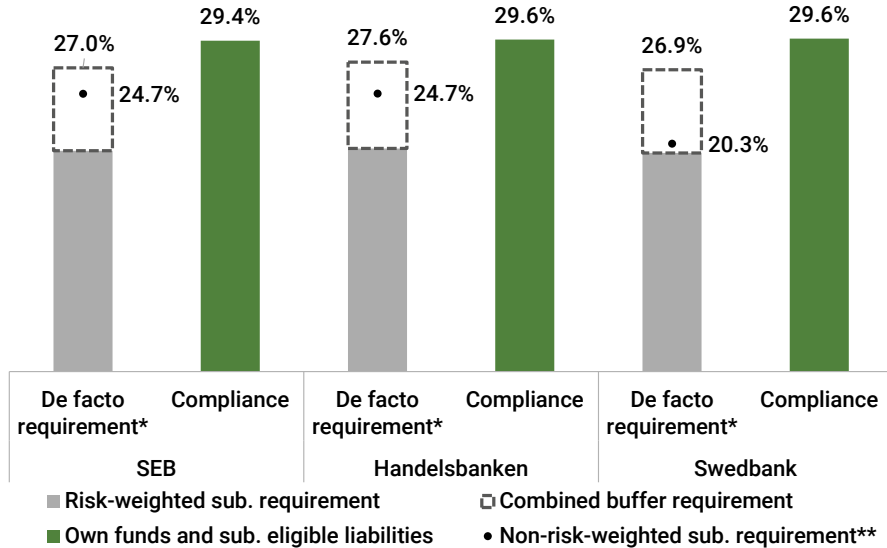
Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

Figures 7 and 8 show indicative compliance with the subordination sub-requirement that will apply as of 1 January 2024. The risk-weighted requirement consists of the actual requirement plus the combined buffer requirement. The non-risk-weighted requirement amounts to 6 per cent of LRE for all institutions. To enable comparison between the requirements, the non-risk-weighted requirement is recalculated from per cent of LRE to per cent of TREA. The figures thereby show compliance (right column for each institution) in relation to the de facto risk-weighted target level and non-risk-weighted target level (left column for each institution).



**Figure 7 Indicative compliance on 2022-12-31 with the subordination requirements that will apply as of 2024**

Per cent of TREA

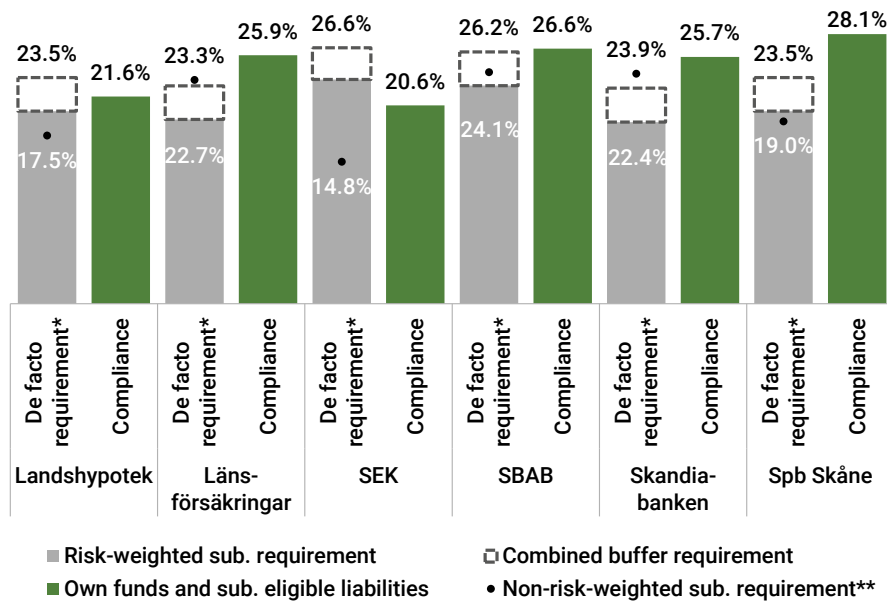


Note: \*The de facto target level consists of the risk-weighted target level plus the combined buffer requirement (see also the In-depth part on pages 12–13). \*\*The non-risk-weighted target level is recalculated to per cent of TREA.

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

**Figure 8 Indicative compliance on 2022-12-31 with the subordination requirements that will apply as of 2024**

Per cent of TREA



Note: \*The de facto target level consists of the risk-weighted target level plus the combined buffer requirement (see also the In-depth part on pages 12–13). \*\*The non-risk-weighted target level is recalculated to per cent of TREA.

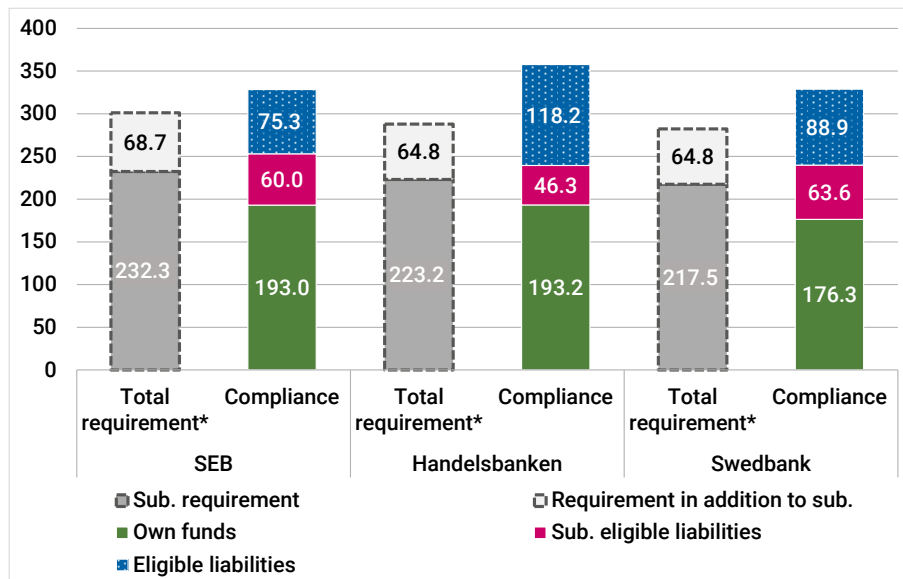
Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

## Compliance with MREL per type of instrument

MREL and the subordination sub-requirements lead to a total need for own funds, subordinated eligible liabilities, and non-subordinated eligible liabilities (see also the In-depth part on pages 12–13 for a description of what the requirements consist of and how they are met). Figures 9, 10, and 11 show, for informational purposes, the status of the systemically important institutions' compliance at the end of the fourth quarter of 2022 with the requirements that will apply as of 1 January 2024 (the subordination requirements and total MREL). The requirements and compliance with them are expressed in SEK billion in order to provide an indication of the actual issuance need for each institution.

**Figure 9 Aggregate compliance on 2022-12-31 with the requirements that will apply as of 2024 – major banks**

SEK billion

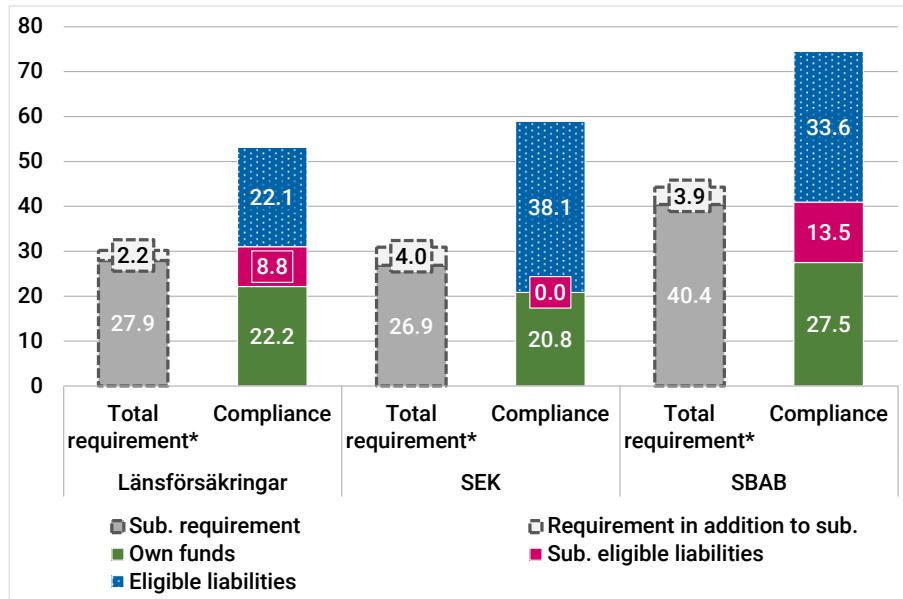


Note: \*Aggregate requirements (de facto risk-weighted and non-risk-weighted) on the basis of total MREL and the subordination sub-requirements (see also the In-depth part on pages 12–13).

Sources: The Debt Office

**Figure 10 Aggregate compliance on 2022-12-31 with the requirements that will apply as of 2024 – Länsförsäkringar, SEK, and SBAB**

SEK billion

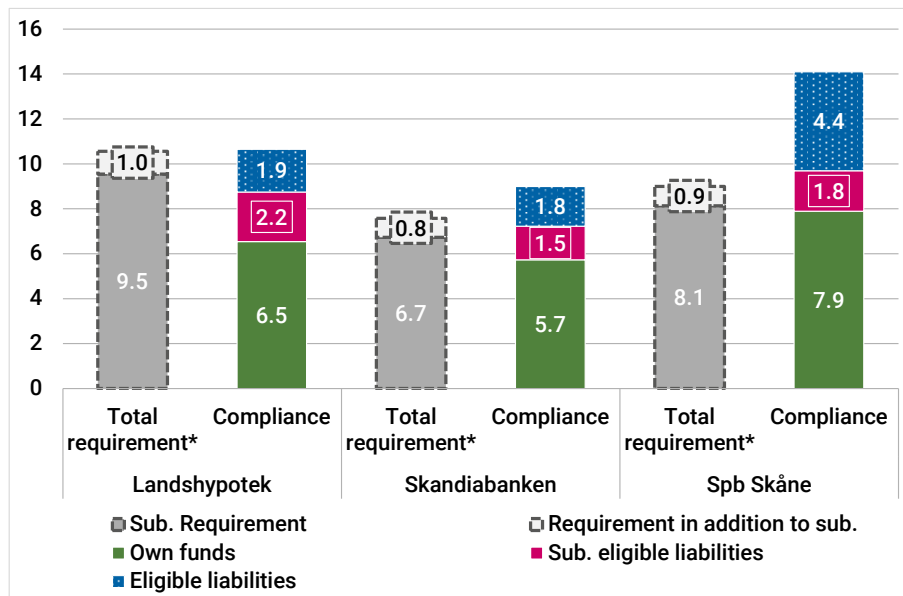


Note: \*Aggregate requirements (de facto risk-weighted and non-risk-weighted) on the basis of total MREL and the subordination sub-requirements (see also the In-depth part on pages 12–13).

Sources: The Debt Office

**Figure 11 Aggregate compliance on 2022-12-31 with the requirements that will apply as of 2024 – Landshypotek, Skandiabanken, and Sparbanken Skåne**

SEK billion



Note: \*Aggregate requirements (de facto risk-weighted and non-risk-weighted) on the basis of total MREL and the subordination sub-requirements (see also the In-depth part on pages 12–13).

Sources: The Debt Office

## In-depth

### Calculating and meeting MREL

The following is a description of the calculation of, and compliance with, MREL that will apply once the requirements are completely phased in on 1 January 2024.<sup>7</sup>

#### Calculation

MREL is calculated on the basis of an institution's capital requirements and consists of a risk-weighted and a non-risk-weighted requirement. The risk-weighted requirement is expressed as a percentage of the total risk-weighted exposure amount (TREA) and the non-risk-weighted requirement as a percentage of the leverage ratio exposure measure (LRE). Both the risk-weighted and the non-risk-weighted requirements are made up of the sum of a loss absorption amount (LAA) and a recapitalisation amount (RCA).

For risk-weighted MREL, LAA amounts to the sum of the institution's risk-weighted Pillar 1 and Pillar 2 requirements. For non-risk-weighted MREL, RCA amounts to the institution's minimum leverage ratio requirement (3 per cent of LRE).

For risk-weighted MREL, RCA amounts to the sum of the institutions' risk-weighted Pillar 1 and Pillar 2 requirements as well as a market confidence charge (MCC). MCC corresponds to the combined buffer requirement excluding the countercyclical buffer requirement, plus the institutions' Pillar 2 guidance. For non-risk-weighted MREL, RCA amounts to the institution's minimum leverage ratio requirement (3 per cent of LRE).

#### Compliance

MREL is to be met with own funds and eligible liabilities. In addition to the level of MREL, the Debt Office decides on the size of the requirement that is to be met with own funds and subordinated eligible liabilities. The subordination sub-requirement constitutes a part of MREL and can thereby not exceed the risk-weighted or non-risk-weighted MREL. The risk-weighted sub-requirement amounts to twice as much as the institutions' Pillar 1 and Pillar 2 requirements. The non-risk-weighted sub-requirement amounts to 8 per cent of the institution's total liabilities and own funds, although never higher than the non-risk-weighted MREL. In practice, the institutions' MCC can thus be met with eligible liabilities, while other parts of the requirements are to be met with own funds and subordinated eligible liabilities.

The Common Equity Tier 1 capital that is used to meet the combined buffer requirement may not at the same time be used to meet the risk-weighted MREL (this applies to both total MREL and the subordination sub-requirement). The combined buffer requirement shall thus be met in addition to risk-weighted MREL.

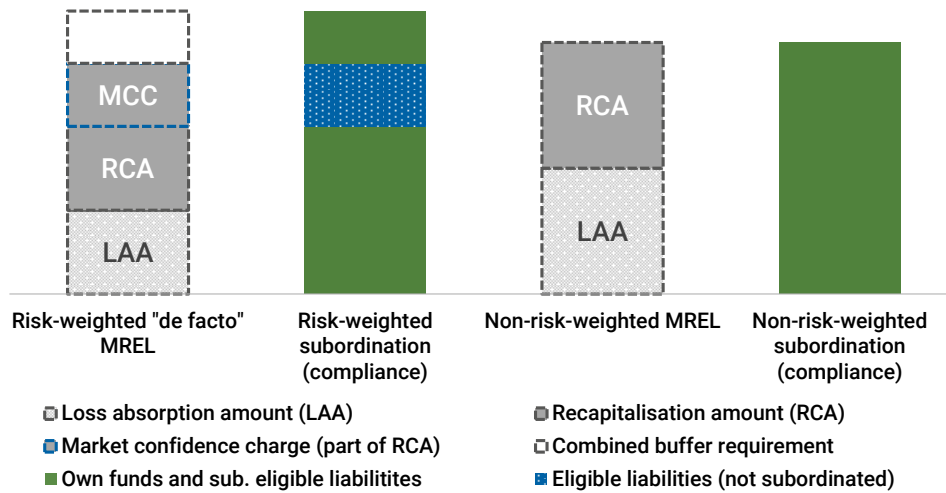
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<sup>7</sup> See also the decision memorandum: Minimum requirement for own funds and eligible liabilities (MREL) from 13 October 2021 (Reg. no. RGR 2021/26) for a more detailed description of the legal conditions and the Debt Office's application of MREL.

This leads to an aggregate “de facto” risk-weighted requirement that consists of MREL plus the combined buffer requirement.

The figure below shows what the rules for MREL and the Debt Office’s application entail for the level of MREL (de facto risk-weighted requirement and non-risk-weighted requirement) as well as how they are met.

Figure 12 Illustration of MREL and subordination (compliance)



Sources: The Debt Office

## Appendix of tables

The tables below show the data on each institution's compliance and requirements used for the figures in this report. Differences due to rounding of figures may occur.

**Table 1 SEB aggregate data, 2022-12-31**

<b>SEB</b>	<b>SEK million</b>	<b>% of TREA</b>	<b>% of LRE</b>
Total risk-weighted exposure amount (TREA)	859,320	-	-
Leverage ratio exposure measure (LRE)	3,539,598	-	-
Own funds	193,025	22.46%	5.45%
Own funds and subordinated eligible liabilities	253,037	29.45%	7.15%
Own funds and eligible liabilities	328,353	38.21%	9.28%
Combined buffer requirement	63,391	7.38%	-
<u>MREL (including buffer)</u>			
Risk-weighted target level for MREL (as of 1 January 2022)	232,333	27.04%	-
Risk-weighted target level for subordination (as of 1 January 2022)	179,399	20.88%	-
Non risk-weighted target level for MREL (as of 1 January 2022)	176,980	-	5.00%
Risk-weighted MREL (as of 1 January 2024)	301,079	35.04%	-
Risk-weighted subordination requirement (as of 1 January 2024)	232,333	27.04%	-
Non-risk-weighted MREL (as of 1 January 2024)	212,376	-	6.00%

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

**Table 2 Handelsbanken aggregate data, 2022-12-31**

<b>Handelsbanken</b>	<b>SEK million</b>	<b>% of TREA</b>	<b>% of LRE</b>
Total risk-weighted exposure amount (TREA)	810,144	-	-
Leverage ratio exposure measure (LRE)	3,341,332	-	-
Own funds	193,186	23.85%	5.78%
Own funds and subordinated eligible liabilities	239,486	29.56%	7.17%
Own funds and eligible liabilities	357,687	44.15%	10.70%
Combined buffer requirement	62,300	7.69%	-
<u>MREL (including buffer)</u>			
Risk-weighted target level for MREL (as of 1 January 2022)	223,195	27.55%	-
Risk-weighted target level for subordination (as of 1 January 2022)	171,670	21.19%	-
Non risk-weighted target level for MREL (as of 1 January 2022)	167,067	-	5.00%
Risk-weighted MREL (as of 1 January 2024)	288,007	35.55%	-
Risk-weighted subordination requirement (as of 1 January 2024)	223,195	27.55%	-
Non-risk-weighted MREL (as of 1 January 2024)	200,480	-	6.00%

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

Table 3 Swedbank aggregate data, 2022-12-31

Swedbank	SEK million	% of TREA	% of LRE
Total risk-weighted exposure amount (TREA)	809,438	-	-
Leverage ratio exposure measure (LRE)	2,735,019	-	-
Own funds	176,331	21.78%	6.45%
Own funds and subordinated eligible liabilities	239,891	29.64%	8.77%
Own funds and eligible liabilities	328,778	40.62%	12.02%
Combined buffer requirement	60,001	7.41%	-
<u>MREL (including buffer)</u>			
Risk-weighted target level for MREL (as of 1 January 2022)	217,518	26.87%	-
Risk-weighted target level for subordination (as of 1 January 2022)	169,275	20.91%	-
Non risk-weighted target level for MREL (as of 1 January 2022)	136,751	-	5.00%
Risk-weighted MREL (as of 1 January 2024)	282,273	34.87%	-
Risk-weighted subordination requirement (as of 1 January 2024)	217,518	26.87%	-
Non-risk-weighted MREL (as of 1 January 2024)	164,101	-	6.00%

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

Table 4 Landshypotek aggregate data, 2022-12-31

Landshypotek	SEK million	% of TREA	% of LRE
Total risk-weighted exposure amount (TREA)	40,563	-	-
Leverage ratio exposure measure (LRE)	118,309	-	-
Own funds	6,539	16.12%	5.53%
Own funds and subordinated eligible liabilities	8,747	21.56%	7.39%
Own funds and eligible liabilities	10,652	26.26%	9.00%
Combined buffer requirement	1,420	2.50%	-
<u>MREL (including buffer)</u>			
Risk-weighted target level for MREL (as of 1 January 2022)	9,549	23.54%	-
Risk-weighted target level for subordination (as of 1 January 2022)	6,896	17.00%	-
Non risk-weighted target level for MREL (as of 1 January 2022)	5,915	-	5.00%
Risk-weighted MREL (as of 1 January 2024)	10,563	26.04%	-
Risk-weighted subordination requirement (as of 1 January 2024)	9,549	23.54%	-
Non-risk-weighted MREL (as of 1 January 2024)	7,099	-	6.00%

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

**Table 5 Länsförsäkringar aggregate data, 2022-12-31**

<b>Länsförsäkringar</b>	<b>SEK million</b>	<b>% of TREA</b>	<b>% of LRE</b>
Total risk-weighted exposure amount (TREA)	119,910	-	-
Leverage ratio exposure measure (LRE)	465,690	-	-
Own funds	22,164	18.48%	4.76%
Own funds and subordinated eligible liabilities	31,007	25.86%	6.66%
Own funds and eligible liabilities	53,144	44.32%	11.41%
Combined buffer requirement	4,197	2.50%	-
<b>MREL (including buffer)</b>			
Risk-weighted target level for MREL (as of 1 January 2022)	27,196	22.68%	-
Risk-weighted target level for subordination (as of 1 January 2022)	20,385	17.00%	-
Non risk-weighted target level for MREL (as of 1 January 2022)	23,284	-	5.00%
Risk-weighted MREL (as of 1 January 2024)	30,191	25.18%	-
Risk-weighted subordination requirement (as of 1 January 2024)	27,193	22.68%	-
Non-risk-weighted MREL (as of 1 January 2024)	27,941	-	6.00%

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

**Table 6 SEK aggregate data, 2022-12-31**

<b>SEK</b>	<b>SEK million</b>	<b>% of TREA</b>	<b>% of LRE</b>
Total risk-weighted exposure amount (TREA)	100,926	-	-
Leverage ratio exposure measure (LRE)	248,596	-	-
Own funds	20,838	20.65%	8.38%
Own funds and subordinated eligible liabilities	20,838	20.65%	8.38%
Own funds and eligible liabilities	58,948	58.41%	23.71%
Combined buffer requirement	3,330	3.30%	-
<b>MREL (including buffer)</b>			
Risk-weighted target level for MREL (as of 1 January 2022)	26,887	26.64%	-
Risk-weighted target level for subordination (as of 1 January 2022)	16,955	16.80%	-
Non risk-weighted target level for MREL (as of 1 January 2022)	12,430	-	5.00%
Risk-weighted MREL (as of 1 January 2024)	30,924	30.64%	-
Risk-weighted subordination requirement (as of 1 January 2024)	26,887	26.64%	-
Non-risk-weighted MREL (as of 1 January 2024)	14,916	-	6.00%

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)



Table 7 SBAB aggregate data, 2022-12-31

SBAB	SEK million	% of TREA	% of LRE
Total risk-weighted exposure amount (TREA)	154,151	-	-
Leverage ratio exposure measure (LRE)	618,926	-	-
Own funds	27,484	17.83%	4.44%
Own funds and subordinated eligible liabilities	40,945	26.56%	6.62%
Own funds and eligible liabilities	74,501	48.33%	12.04%
Combined buffer requirement	5,418	3.51%	-
<u>MREL (including buffer)</u>			
Risk-weighted target level for MREL (as of 1 January 2022)	40,411	26.21%	-
Risk-weighted target level for subordination (as of 1 January 2022)	26,229	17.01%	-
Non risk-weighted target level for MREL (as of 1 January 2022)	30,946	-	5.00%
Risk-weighted MREL (as of 1 January 2024)	44,264	28.71%	-
Risk-weighted subordination requirement (as of 1 January 2024)	40,411	26.21%	-
Non-risk-weighted MREL (as of 1 January 2024)	37,136	-	6.00%

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

Table 8 Skandiabanken aggregate data, 2022-12-31

Skandiabanken	SEK million	% of TREA	% of LRE
Total risk-weighted exposure amount (TREA)	28,129	-	-
Leverage ratio exposure measure (LRE)	112,228	-	-
Own funds	5,730	20.37%	5.11%
Own funds and subordinated eligible liabilities	7,229	25.70%	6.44%
Own funds and eligible liabilities	8,992	31.96%	8.01%
Combined buffer requirement	998	3.55%	-
<u>MREL (including buffer)</u>			
Risk-weighted target level for MREL (as of 1 January 2022)	6,314	22.45%	-
Risk-weighted target level for subordination (as of 1 January 2022)	4,795	17.05%	-
Non risk-weighted target level for MREL (as of 1 January 2022)	5,611	-	5.00%
Risk-weighted MREL (as of 1 January 2024)	7,580	26.95%	-
Risk-weighted subordination requirement (as of 1 January 2024)	6,314	22.45%	-
Non-risk-weighted MREL (as of 1 January 2024)	6,734	-	6.00%

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

**Table 9 Sparbanken Skåne aggregate data, 2022-12-31**

<b>Handelsbanken</b>	<b>SEK million</b>	<b>% of TREA</b>	<b>% of LRE</b>
Total risk-weighted exposure amount (TREA)	34,556	-	-
Leverage ratio exposure measure (LRE)	109,330	-	-
Own funds	7,896	22.85%	7.22%
Own funds and subordinated eligible liabilities	9,695	28.05%	8.87%
Own funds and eligible liabilities	14,100	40.80%	12.90%
Combined buffer requirement	1,210	3.50%	-
<b><u>MREL (including buffer)</u></b>			
Risk-weighted target level for MREL (as of 1 January 2022)	8,135	23.54%	-
Risk-weighted target level for subordination (as of 1 January 2022)	5,875	17.00%	-
Non risk-weighted target level for MREL (as of 1 January 2022)	5,467	-	5.00%
Risk-weighted MREL (as of 1 January 2024)	8,998	26.04%	-
Risk-weighted subordination requirement (as of 1 January 2024)	8,135	23.54%	-
Non-risk-weighted MREL (as of 1 January 2024)	6,560	-	6.00%

Sources: The Debt Office and Finansinspektionen (Swedish Financial Supervisory Authority)

**The Swedish National Debt Office is the central government's financial manager and the national resolution authority. The Debt Office plays an important role in the Swedish economy and financial markets.**



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