NORDIC INVESTMENT BANK

FINANCING THE FUTURE

Risk Management Policies

Adopted by the Board of Directors of the Nordic Investment Bank on 26 April 2018 with entry into force as of 30 April 2018

Contents

DEFINITIONS

Counterparty	Entity with whom the Bank enters into business transactions Refers to a single entity or group of entities which are legally and/or financially consolidated or otherwise interdependent from a risk perspective
Credit exposure	Lending exposure + Treasury exposure
ICAAP	Internal Capital Adequacy Assessment Process
Lending exposure	Loans outstanding (without deduction of collateral held) + agreed, not disbursed loans
MCC	Mid-Cap corporate with an annual turnover of EUR 150-500 million
Risk-owner	Entity ultimately responsible for the Bank's claim. May be different from the counterparty if the risk is transferred through a guarantee
SMC	Small Mid-Cap corporate which is not a SME and has an annual turnover of less than EUR 150 million
SME	Small and Medium-sized Enterprise with less than 250 employees and an annual turnover of less than EUR 50 million or a balance sheet less than EUR 43 million
Treasury exposure	Defined on an instrument basis as follows: Capital market instruments = nominal value of the instrument Reverse repurchase agreements = Fixed percentage of the nominal value of the transaction Derivatives with Credit Support Annex (CSA) = market value, net of collateral held Derivatives without CSA = market value + add-on for potential future value fluctuations.

Document revision history

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Financial Policies and Guidelines was originally approved by the Board of Directors in August 1995 and subsequently updated in 1998, 2002, 2004, 2006, 2007 and 2009.

1 INTRODUCTION

1.1 Purpose and scope

The purpose of this document is to set out the high level principles for the Bank's management of its key risks. The key risks covered are credit risk, market risk, liquidity risk, operational risk and compliance risk.

The high level principles for the Bank's risk management are subject to regular update and amendment, as required. Amendments to the document are approved by the Board of Directors. The high-level principles shall be affirmed by the Board at least annually in connection with the review of the maximum limits for risk exposure.

The document is structured to set the Bank's risk-taking into the context of its mission and strategy as well as to its risk-bearing capacity and willingness to take various risks (risk appetite). The Bank's risk governance structure is described with focus on key risks. The risk management principles related to key risks are described as follows: (1) Definition of the risk; (2) Sources of the risk for NIB; (3) Risk management roles and responsibilities (risk governance); (4) Risk management principles including risk mitigation.

The high-level principles for risk management are implemented through policies, limits, operational guidelines as well as methodologies and tools for risk identification, measurement, monitoring and reporting. Together these form the Bank's risk management framework.

Risk Management Framework

This document is made public on the Bank's website www.nib.int. The appendices containing, among others, maximum exposure limits are for internal use only.

2 KEY OPERATING PRINCIPLES OF THE BANK

2.1 Mission and strategy

NIB is the international financial institution (IFI) of the Nordic and Baltic countries. The Bank's mission is to promote sustainable growth of its member countries by providing financing to projects that promote productivity growth and environmental benefits.

NIB adds value by providing long-term financing in the form of loans and guarantees as a complement to other sources of financing. The Bank's competitive advantage is its ability to obtain funding at a favourable cost in the international capital markets, which enables longer-term lending on competitive terms to its clients. NIB's funding advantage builds on its strong shareholder base and sound financial profile, which has enabled the Bank to maintain the highest possible credit rating (AAA/Aaa) from international rating agencies and investor confidence in the Bank as a debt issuer.

2.2 Mission fulfilment

The Statutes stipulate that the Bank shall provide loans and guarantees. Loans are granted and guarantees issued in the Bank's Ordinary Lending and under the special loan facilities, Project Investment Loans (PIL) and Environmental Investment Loans (MIL).

Mission fulfilment is a key consideration when determining the Bank's willingness to take risk. For the purpose of assessing its mission fulfilment, the Bank has translated the mission into operational guidelines and principles and established a methodology for mandate rating. Each project considered for financing from NIB undergoes a mandate rating whereby the expected contribution to promoting productivity growth and environmental benefits is assessed. The assessment covers both the potential impact of the project and the implementation risk, i.e. the probability that the impact will not materialise. The mandate rating methodology and process is described in the Mandate Rating Framework.

As a rule, a sufficient mandate rating is a prerequisite for financing from the Bank. In its annual business plan, the Bank sets a target level for new loans achieving mandate ratings of 'good' and 'excellent'. [1]

For assessing how well NIB's lending projects have been implemented by borrowers and NIB's mandate criteria fulfilled, the Bank has established a Monitoring and Ex-Post Mandate Assessment Framework.

2.3 Sustainability policy

Given NIB's mission, sustainability has high priority in the Bank's operations. The Bank believes that economic growth and sustainability can go hand in hand and that taking environmental and social aspects into account is consistent with sound business practice and enhances both the Bank's and the client's competitive advantage.

The Bank has implemented a Sustainability Policy with the objective to improve the predictability, transparency and accountability of its actions. The policy sets out the Bank's approach to sustainable development and provides guidelines for how the Bank seeks to

[1] The mandate rating scale is **Excellent/Good/Moderate/Marginal/Neutral** and **Negative.**

ensure that the projects financed are socially and environmentally sustainable and in compliance with applicable regulatory requirements and international good practices.

The Bank recognises that adverse environmental and social impacts cannot be avoided in all projects but must be appropriately reduced, mitigated or compensated for. Activities that the Bank considers unacceptable from a sustainability perspective and, thus, not eligible for NIB financing are defined in the Exclusion List.

NIB is committed to transparency and open dialogue with its stakeholders on sustainability issues in terms of both risks and opportunities. Information on projects with potential significant adverse social or environmental impacts is made public for comments (www.nib.int) in accordance with the Bank's Public Information Policy.

2.4 Risk-taking

The foundation for the Bank's financial risk-taking is set in the constituent documents. The Statutes require that loans be made in accordance with sound banking principles, that adequate security be obtained for the loans, unless sufficient security is considered to exist under the circumstances, and that the Bank protects itself against the risk of exchange rate losses to the extent practicable.

The Statutes stipulate ceilings for the Bank's lending and recourse to the member countries in case of losses incurred on project investment loans and environmental investment loans.

- Ordinary lending may be granted up to an amount corresponding to 250% of the authorised capital and accumulated general reserves. Within Ordinary Lending, the Bank provides direct financing to small and medium-sized enterprises (SMEs) and small mid-cap corporates (SMCs) in the member countries up to a total amount of EUR 250 million and to mid-cap corporates (MCCs) in the member countries up to EUR 500 million. As an alternative to direct loans the Bank may finance environmental projects through investments in green bonds issued by corporates and municipalities in the member countries. The facility for green bond investments is EUR 500 million.

- Project Investment Loan (PIL) may be granted up to EUR 4,000 million. The member countries guarantee 90% of each loan under the PIL facility up to a total amount of EUR 1,800 million. The Bank, however, will assume 100% of any losses incurred under an individual PIL loan, up to the amount available at any given time in the Special Credit Risk Fund for PIL.

- Environmental Investment Loans (MIL) may be granted up to the statutory ceiling of EUR 300 million.The Bank's member countries guarantee 100% of loans outstanding under the MIL facility. [2]

Given NIB's mission, risk-taking is primarily in its core activity of lending. The Bank strives to be responsive to the financing needs of its customers and the policy objectives of its member countries, thereby maintaining its relevance for key stakeholders. Careful balancing of mission fulfilment, revenue generation and risk mitigation is a key consideration in the Bank's risk-taking.

The Bank's risk tolerance in its treasury operations is driven by the objective of maintaining a strong liquidity and funding position to support the lending activities. Although performance objectives are set for the treasury operations, the Bank applies a conservative risk versus return

[2] Up to date figures on the Member countries' total guarantee liability for covering losses, at any given time, are found at NIB's website, http://www.nib.int/MIL

approach in these activities. This is reflected, i.a. in stricter eligibility criteria for treasury counterparties as compared to lending counterparties.

The Bank's risk-taking is operationalised in the policies and limits described in Section 3, which governs the Bank's risk-taking in its key risk areas.

2.5 Capital structure and management

2.5.1 Capital structure

The Bank's ability to take risks is dependent on its risk-bearing capacity. A key factor determining the risk-bearing capacity is stable earnings allowing the build-up of a strong capital base to absorb potential losses.

The Bank's risk appetite takes into account the statutory requirement that the Bank shall aim for a profit allowing for a reasonable return to its owners. The Bank's Dividend Policy sets as a target a dividend pay-out ratio of the annual net profit over the long-term. The dividend distribution is approved by the Board of Governors.

NIB's capital consists of capital subscribed by the member countries and reserves accumulated through internal profit generation.

- **Equity** comprises the paid-in portion of the capital subscribed by the member countries and the accumulated general and specific reserves.
    - The *General Credit Risk Fund* is established to cover unidentified, exceptional credit losses.
    - The *Statutory Reserve* is a general reserve, which according to the Statutes must equal 10% of the subscribed capital before dividends can be paid.
    - The *Special Credit Risk Fund for PIL* is designed to cover the Bank's own risk in respect of the PIL loan facility.
- **Callable capital** is capital subscribed by the member countries but not paid in. Callable capital is made available by the member countries at the request of the Board of Directors if deemed necessary for the fulfilment of the Bank's debt obligations. To date no capital calls have been made.

For capital adequacy assessment purposes NIB uses the concept of **regulatory capital** to measure its loss absorbency capacity. The concept builds on the regulatory requirements and is derived by deducting certain items from the equity.

2.5.2 Capital and liquidity adequacy assessment

The Bank manages capital in accordance with statutory requirements, annual financial and business plans approved by the Board of Directors, its risk position and macroeconomic circumstances. As an IFI, the Bank is not subject to national or international banking supervision and regulations and, thus, not required to comply with capital or liquidity adequacy requirements as stipulated in the regulations. However, the Bank considers observance of prevailing capital and liquidity adequacy standards as vital for maintaining the confidence of external stakeholders such as investors and rating agencies. The Bank aims to maintain a robust capital level and liquidity buffer in order to support the highest possible credit rating by the rating agencies and to compare well with its peers.

The Bank's internal capital adequacy assessment process (ICAAP) aims to ensure that the Bank holds a sufficient amount of capital and liquidity to withstand its current and potential future risks, including adverse macroeconomic conditions. The framework provides a holistic view on the level of risks, the robustness of risk controls and the amount and quality of capital and liquidity needed to support the strategic objectives of the Bank.

The Bank's ICAAP covers all material risks identified in the risk identification process. Quantitative risk metrics support the risk identification and assessment process.

The Bank monitors its capital and liquidity adequacy on an on-going basis and reports the position to the Board of Directors regularly. In addition, at least annually the Bank conducts a more thorough internal assessment of its capital and liquidity adequacy in line with its ICAAP and provides the outcomes of the assessment to the Board of Directors.

The capital requirement is assessed on a risk-by-risk basis. The assessment and conclusions build on both the use of the Bank's internal models and other available information. The scope and risk coverage of the assessment is reviewed regularly. Capital is reserved for all material risks. The resulting capital requirement is complemented by capital buffers. Capital buffers include macroeconomic buffers, a stress test buffer and additional management buffers. The Bank's overall capital requirement is determined by aggregating the risk area specific capital requirements and the capital buffers. The overall capital requirement is measured against the Bank's available financial resources to determine the Bank's capital adequacy.

A key determinant of the Bank's capital requirement is the utilisation of the statutory limit for Ordinary Lending. The limit restricts ordinary lending to 250% of total subscribed capital and accumulated general reserves (i.e. the Statutory Reserve and the General Credit Risk Fund).

The assessment of liquidity risk builds on various internal and regulatory metrics complemented by qualitative analysis. The main quantitative metric used in the liquidity risk assessment is the survival horizon, which measures how long the Bank is able to fulfil its payment obligations in a severe stress scenario. The resulting liquidity requirement is measured against available liquid assets (liquidity buffer) to determine the Bank's liquidity adequacy.

The ICAAP methodology describes the framework, assessment elements and the internal process in more detail.

2.5.3 Stress testing

Stress testing is a forward-looking risk management tool supporting the Bank's risk identification, monitoring and reporting procedures, capital and liquidity adequacy assessments as well as capital and liquidity planning. Stress testing, including sensitivity analysis and reverse stress testing, are used for assessing the resilience of the Bank under different economic assumptions or scenarios.

The Bank conducts both capital stress tests and liquidity stress tests to ensure that it is sufficiently capitalised and holds adequate liquidity buffers to carry out its mission even in severe but plausible macroeconomic scenarios. The design of the stress test methodology and the specification and severity of test scenarios reflect the Bank's business model, risk profile as well as current and assumed future macroeconomic circumstances.

The stress testing outcomes are utilised in the Bank's capital and liquidity adequacy assessments, capital planning and risk management. Stress tests for ICAAP purposes are conducted in line with the ICAAP schedules.

2.6 Risk governance

The risk governance structure outlines the key responsibilities for decisions on risk taking and risk oversight in the Bank (Appendix A).

The **Board of Governors** is the Bank's supreme decision-making body. The Board of Governors is responsible for, among other things, matters concerning NIB's Statutes and subscribed capital. The Board of Governors approves the annual report of the Board of Directors and the audited financial statements of the Bank. Each member country appoints a member of its respective government to the Board of Governors, Rules of Procedure for the Board of Governors.

The **Control Committee** is the Bank's supervisory body. It ensures that the operations of the Bank are conducted in accordance with the Statutes. The committee is responsible for the audit of the Bank's accounts and submits its annual audit report to the Board of Governors, Rules of Procedure for the Control Committee.

All the powers that are not exclusively vested in the Board of Governors are entrusted to the **Board of Directors.** The Board of Directors has the overall responsibility of the Bank's risk management and oversees the implementation of the Bank's risk management framework by approving risk management policies, including maximum limits for exposure to the main types of risk, as well as by approving the capital and liquidity adequacy assessment process and its outcomes. The Board approves credits and grants authorisation to the Bank to raise funds in the capital markets based on its estimated funding requirements, Rules of Procedure for the Board of Directors.

The President is responsible for implementing the Bank's risk management framework set by the Board of Directors, for management of the Bank's risk exposures, and for ensuring that the Bank's aggregate risk is consistent with its financial resources and willingness to take risk. The Board of Directors has delegated some credit approval authority to the President for execution in the Credit Committee.

The following committees assist and advise the President:

- The **Executive Committee** consists of the President and senior staff members, whose appointments are confirmed by the Board of Directors. The committee is the forum for addressing policy and management issues, including following up the financial results, business plan and strategy of the Bank. The committee meets approximately twice a month (Rules of Procedure for the Executive Committee).

- The **Asset and Liability Committee (ALCO)** consists of the members of the Executive Committee and the Chief Risk Officer. ALCO is responsible for monitoring and assessing the Bank's overall risk profile. ALCO's duties include monitoring the Bank's balance sheet development and capital adequacy, setting targets and limits for risks to be managed at the bank level, monitoring liquidity adequacy and funding structure, as well as monitoring performance against the agreed risk appetite. The committee meets approximately six times a year (Rules of Procedure for the Asset and Liability Committee).

- The **Credit Committee** consists of the President and senior officers appointed by the Board of Directors. The committee is responsible for preparing and making decisions on credit matters related to lending operations and for approving treasury counterparties. The President exercises his executive powers regarding lending operations through the Credit Committee. Further, the committee reviews all credit proposals submitted to the Board of Directors for approval. The committee usually meets weekly (Rules of Procedure for the Credit Committee).

- The **Finance Committee** consists of the President and other senior staff members. The committee is responsible for preparing and making decisions on matters related to treasury operations. The committee makes recommendations, and where appropriate, decisions in the area of market, counterparty and liquidity risk exposure. It also monitors the Bank's borrowing activities and has oversight of treasury risk reporting to the Board of Directors. The committee usually meets monthly (Rules of Procedure for the Finance Committee).

- The **Business and Technology Committee (BTC**) consists of the Head of IT and other senior staff members appointed by the President. BTC is responsible for aligning the Bank's enterprise architecture with strategic goals by prioritizing, directing, monitoring and governing the technology development (Rules of Procedure for the Business and Technology Committee).

In addition to the above mentioned advisory bodies to the President, the Bank has the following permanent internal committees:

- **The New Product and Structure Committee** scrutinises product and deal structure proposals that significantly differ from what the Bank has entered into previously from a risk and administrative perspective. The committee gives its recommendations to the Executive Committee for decision.

- **The Council of Fighting Corruption** The main task of the Council is to enhance awareness among the Bank's staff and stakeholders about NIB's ethical and integrity values, including the Bank's zero tolerance of corruption, in all its activities and operations.

- **The Trust Fund Committee** shall ensure that the purposes of the trust funds managed by NIB are fulfilled in the most efficient way. The Committee also approves the activity plan of the trust funds and proposes allocations from a trust fund. The Committee gives its recommendations to the respective donor(s) for their final decision.

In the day-to-day operations, the Bank has established a segregation of duties between units that enter into business transactions with customers or otherwise expose the Bank to risk, and units in charge of risk assessment, risk measurement, monitoring and control.

- The business units, **Lending** and **Treasury**, are responsible for implementing the Bank's business strategy. Lending is responsible for loan origination and mandate fulfilment in accordance with the Bank's willingness to take risk. Treasury provides support by executing the funding strategy and managing the liquidity as well as balance sheet risks (Asset and Liability management). The business units carry out the day-to-day management of all risks assumed in their operations and ensure that an adequate return is achieved for the risks taken. The Head of Lending and the Head of Treasury report to the President.

- **Credit and Analysis** is responsible for assessing counterparty credit risk in the Bank's lending and treasury operations. The Credit unit oversees that credit proposals are in compliance with established policies and limits. The Special Credits unit manages transactions requiring particular attention due to restructuring work-out and recovery processing. The Head of Credit and Analysis reports to the President.

- The **Risk Managemen**t unit within **Finance** independently controls the risk positions of the Bank. The unit implements the Bank's risk management policies and practices as approved by the Board of Directors. The unit has the overall responsibility for identifying, measuring, assessing, monitoring and reporting on risks across risk types and organisational units. The unit is responsible for the Bank's risk models and tools, ICAAP as well as the day-to-day monitoring of market, liquidity and operational risks. It also monitors and reports regularly on credit risk at portfolio level. The Chief Risk Officer heads the Risk Management unit and reports to the Head of Finance, who reports to the President.

- The **Legal department** supports the business units carrying the responsibility for minimising and mitigating legal risks in all of the Bank's operational, institutional and administrative activities. The General Counsel reports to the President and is Secretary to the Board of Governors, the Board of Directors and the Control Committee.

- The **Compliance** function assists the Bank in identifying, assessing, monitoring and reporting on compliance risks in matters relating to the institution, its operations and the personal conduct of staff members. The Chief Compliance Officer reports to the President, with full access to the Chairman of the Board of Directors and the Chairman of the Control Committee.

- **Internal Audit** provides an independent evaluation of the controls, risk management and governance processes. The Head of Internal Audit reports to the Board of Directors and the Control Committee and works administratively under the auspices of the President.

3 RISK MANAGEMENT

3.1 General

The main risks that the Bank has identified in its operations are credit risk, market risk, liquidity risk, operational risk and compliance risk. Risks are managed with the overall objective of maintaining financial soundness and avoiding activities that could threaten the Bank's reputation.

While NIB is not subject to banking regulations, the Bank considers European Union Directives and Regulations on the banking sector and recommendations and guidelines from the European Banking Authority as well as international regulatory standards set by the Basel Committee on Banking Supervision as the reference for its risk management framework.

The Bank's risk management framework comprises risk policies and procedures formulated for the identification, measurement, assessment, monitoring and reporting of risks including several layers of limits set to manage the exposure to quantifiable risks. The Bank recognises that effective risk management is based on a sound risk culture, which is characterised, among others, by a high level of awareness concerning risk and risk management in the organisation. Regular training of staff in risk related matters is part of the Bank's risk management practices.

3.2 Credit risk

3.2.1 Definition and sources of risk

Credit risk is defined as the risk of loss resulting from the failure of the Bank's borrowers and other counterparties to fulfil their contractual obligations and that collateral provided does not cover the Bank's claims.

Credit risk is NIB's main financial risk. Given the Bank's mission, most of the credit risk arises in the Bank's lending operations. The Bank is also exposed to credit risk in its treasury activities, where credit risk derives from the financial assets and derivative instruments that the Bank uses for investing its liquidity and managing foreign exchange and interest rate risks in its funding and lending transactions. Despite a reasonably well-diversified portfolio, the Bank is subject to concentration risk due to its regional focus.

As a general principle, the Bank finances maximum 50% of the total costs for a single project. Financing to small and medium-sized enterprises, small mid-cap corporates and mid-cap corporates in the Bank's member countries can be extended up to 75% of the total project or financing need fulfilling NIB's mandate criteria.

3.2.2 Key responsibilities

The Board of Directors approves new loans and sets the limits for maximum credit risk exposure at counterparty and portfolio level. The Board has authorised the President to approve loans up to a defined amount in the Credit Committee (Rules of Procedure for the Credit Committee). Treasury counterparties are approved by the Credit Committee within the limits authorised by the Board. The Board receives information on credit approvals made in the Credit Committee.

The Lending department is responsible for the loan appraisal process in cooperation with Credit & Analysis, which provides an independent credit risk assessment and verifies compliance with policies and guidelines. The appraisal process for new counterparties in treasury operations is the responsibility of Treasury in cooperation with Credit & Analysis. The credit risk monitoring process and related responsibilities are laid out in the Guidelines for credit counterparty monitoring and reporting.

The Credit Committee decides on watch-listing of credits and on impairment provisioning. The handling of distressed credits is described in the Special Credit Unit Guidelines.

3.2.3 Credit risk management

NIB's credit risk management aims at preserving the high credit quality of the Bank's portfolios and thereby protecting the Bank's short- and long-term viability. The Bank's credit risk management builds on the principles of (1) appropriate risk diversification within the scope of the mission; (2) thorough risk assessment at the credit appraisal stage; (3) risk-based pricing and risk mitigation; (4) continuous risk monitoring at the individual counterparty level as well as portfolio level; (5) avoidance of undesirable risks to the extent possible.

Key risk indicators monitored are, among others, the development in risk class distribution in the lending and treasury portfolios as well as large exposures to individual counterparties, sectors and countries.

3.2.3.1 Risk-sharing and outsourcing of credit risk management

Within Ordinary Lending, the Bank provides direct financing to small and medium-sized enterprises (SMEs) and small mid-cap corporates (SMCs) in the member countries. The Bank's direct lending to the SME/SMC segment is carried out in cooperation with a partner bank and includes outsourcing of certain operations, such as the credit assessment process, as well as potential delegation of authority to the partner bank. A thorough due diligence of the partner bank's credit policies, credit analysis, credit reporting and work-out process is undertaken to ensure fulfilment with NIB's credit policies, rating frameworks and other criteria.

Financing to SMEs/SMCs may be provided on the basis of risk-sharing (in the form of a guarantee or other risk-sharing arrangement) or as direct loans originated and administered by the partner bank. In any risk-sharing arrangement, a key principle is to minimize incentives for adverse selection by the partner bank. In case of pro-rata risk sharing arrangement, NIB will generally not assume more risk than the partner bank on any SME/SMC counterparty. In case of non-pro rata risk sharing arrangements, NIB's maximum exposure on a SME/SMC borrower is determined case by case.

Lending to the SME/SMC segment is further outlined in Credit Risk Policy - SME and small Mid-cap corporate lending.

3.2.3.2 Credit exposure and concentration risk

The Bank strives to avoid excessive concentration in any single counterparty, industry sector or country outside the member countries. The maximum credit exposure that the Bank is willing to take is expressed in terms of exposure limits set by the Board of Directors (Appendix 1-9). Credit exposure is the aggregate of lending and treasury exposure. The limits are measured by total credit exposure and economic capital consumption against the Bank's equity. The limits are reviewed annually.

Counterparty limits

The Bank's lending is directed towards governments, public sector entities, municipalities, corporations and financial institutions. In its treasury operations, the Bank is exposed primarily to financial institutions, governments and public sector entities.

The Bank defines a single counterparty as a counterparty or group of counterparties that are legally and/or financially consolidated or otherwise interdependent from a risk perspective. For exposure limit purposes the Bank considers the entity where the risk resides, i.e. the risk-owner, as the counterparty. The risk-owner is the entity that is ultimately responsible for the Bank's claim and may be different from the obligor if the risk is transferred through a guarantee. The Bank applies risk transfers only when a payment guarantee covering the full exposure is in place (Credit Enhancement Guidelines).

- **Single counterparty limits**: The maximum risk that the Bank is prepared to take on a single counterparty is defined based on the creditworthiness of the counterparty as expressed by the probability of default (PD). In addition, the exposure is limited based on the expected loss (EL) of the transaction(s) entered into with the counterparty. The limits are scaled to the Bank's equity and the counterparty's equity.

  Counterparty limits in the Bank's lending operations apply to non-sovereign exposures whereas in the treasury operations counterparty limits apply to both sovereign and non-sovereign exposures (Counterparty limits, Appendix 1 and 2).

- **Large exposure limits**: The aggregate of large counterparty exposures is managed within limits measured by total credit exposure and economic capital consumption and set in relation to the Bank's equity (Limits on large counterparty exposures, Appendix 4).

  High-risk exposure limit: The Bank strives to control risk concentrations in the weaker risk classes. As such, total lending to counterparties in rating category PD14 [3] and weaker may not exceed 50% of the Bank's equity (Limits on lending to counterparties rated PD14 and weaker, Appendix 5).

  As a rule, the Bank refrains from new lending to borrowers in the risk classes PD17-20 [3].

Industry sector limits

The Bank aims to maintain a reasonably granular portfolio in terms of industry sector exposure. The classification of counterparties into industry sectors is broadly based on the Global Industry Classification Standard (GICS®).

Limits have been set on the maximum credit exposure to a single industry sector as well as on the economic capital consumption of a sector. The limits have been set in relation to the Bank's equity. The Bank accepts higher exposure to the public sector and the financial sector, the latter in order to accommodate the exposure from the Bank's treasury operations, and the lending to financial intermediaries (Business sector limits, Appendix 5).

Country limits

Country limits apply for lending in non-member countries. Limits are reviewed annually and adjusted as and when required to accommodate the development in lending activities. The Bank has not set limits for the aggregate lending exposure in its member countries. Country

[3] Rating scale: PD1 to PD20 and D1,D2; PD1-10 correspond to investment grade ratings by S&P and Moody's

limits for the Bank's treasury operations have been set to include exposure in the member countries.

The key attribute for determining country limits is the country risk rating. The limits are scaled to the Bank's equity (Country limits, Appendix 3 and 3a).

3.2.3.3 Credit risk assessment

The counterparty's debt servicing capacity is a key consideration for credit approval. The assessment of a counterparty's creditworthiness focuses on identifying the main financial risks and business risks related to the counterparty. Based on the assessment, a risk rating indicating the probability of default (PD) is assigned to the counterparty. The Bank's PD rating methodologies are laid out in the rating frameworks for corporates, banks, local and regional governments, project finance and covered bonds. For sovereign counterparties the Bank uses PD ratings derived from external ratings (Country Risk - Assignment, monitoring and reporting process).

A separate expected loss (EL) rating is assigned at the transaction level. The EL rating factors in the loss given default (LGD), i.e. the loss severity in the event of a counterparty default. The LGD assignment process relies on models, which produce an LGD estimate based on the type of counterparty and the characteristics of the transaction, such as guarantees, collateral, seniority of the claim and other credit enhancing factors in the transaction (Rating Framework for Loss Given Default, Rating Framework for Covered Bonds).

The Bank's risk rating system comprises 20 classes to differentiate the risk of counterparty default (Obligor Master Scale, Appendix 11) and the expected loss on a transaction (Transaction Master Scale, Appendix 12). In addition, separate D classes apply for non-performing transactions. For reference to external ratings, the internal scales are mapped to the ratings of Standard & Poor's and Moody's.

The process of assigning PD ratings to counterparties is carried out in the Credit & Analysis department. The responsibility for assigning the LGD is with the cross-departmental Transaction Team, except for assigning LGD to sovereign counterparties, which is the responsibility of Credit & Analysis. The credit opinion provided by the Credit unit within the Credit & Analysis department includes an opinion on the PD and LGD. The risk ratings are approved by the Credit Committee.

The Bank's credit risk assessment includes the use of quantitative risk methodologies and models as well as qualitative assessments based on expert judgement. The development of the analysis tools is made in cooperation between Credit & Analysis and Risk Management under the oversight of senior management in steering committees. The periodic validation of the tools is carried out by the Risk Management unit. Final approval of the tools is made in the Executive Committee.

3.2.3.4 Credit risk mitigation

Lending

The Statutes require that the Bank obtains adequate security for loans granted, unless sufficient security is considered to exist under the circumstances.

The Bank lends and invests on senior unsecured or on secured basis. The level of credit enhancement required in the Bank's lending depends, among others, on the creditworthiness of the counterparty and the tenor and repayment structure of the loan. Unsecured loans are granted only to counterparties that are considered sufficiently creditworthy. Moreover, unsecured lending requires that the borrower has a sufficient unencumbered asset base. When lending on an unsecured basis the Bank requires that various undertakings such as a negative pledge, financial covenants and events of default are included in the loan documentation. The negative pledge is an undertaking by the borrower not to make security arrangements for its debt without the prior written consent of the Bank. The purpose of the negative pledge is to ensure that the borrower will not secure its other borrowings, thereby leaving the Bank as an unsecured creditor in a worse position in case the borrower runs into severe financial distress (Credit Enhancement guidelines).

In its secured lending the Bank relies on collateral and/or guarantees. The collateral should preferably be independent from the obligor (e.g. third party shares or commercial real estate that can readily be taken into alternative use) and there should be a reasonably functioning market for the assets pledged as collateral.

When credit risk mitigation is provided through third party guarantees, the Bank assesses the conditions for **risk transfer**. Risk transfer refers to a substitution procedure whereby the guarantor of a transaction is considered to be the counterparty from a risk perspective (risk-owner) instead of the borrower. A prerequisite for risk transfer is an eligible guarantee undertaking by the guarantor in favour of the Bank. In order for a guarantee to be eligible for risk transfer, it must be a payment guarantee as for own debt and guarantee the timely payment of the full exposure. The Bank should be able to demand payment under the guarantee immediately after the borrower has failed to pay on a due date. The types of acceptable guarantees and collateral as well as related valuation processes are set out in the Credit Enhancement guidelines.

The Transaction Team is responsible for ensuring that the Bank is protected by sufficient credit enhancement. The Credit unit within Credit & Analysis provides an opinion on the proposed credit enhancement. The Credit Committee makes the final decision on the required credit enhancement.

Treasury

In its treasury operations, the Bank uses netting and collateralisation to mitigate credit risk related to derivatives and reverse repurchase agreements. The Bank undertakes swap transactions only with counterparties that meet the required minimum counterparty credit rating and have executed an International Swaps and Derivatives Association (ISDA) Master Agreement and signed a Credit Support Annex (CSA). The ISDA master agreement allows for a single net settlement of all transactions covered by the agreement in the event of a counterparty default or early termination of the transactions. Under the CSA, the derivative positions are marked to market daily, and the resulting exposures are collateralised by cash or government securities. Reverse repurchase transactions are conducted on the terms of the Global Master Repurchase Agreement (GMRA).

3.2.3.5 Credit risk monitoring and reporting

The Bank puts strong emphasis on continuous monitoring of the credit risk development in its lending and treasury operations. Credit risk is monitored both at counterparty level and at portfolio level. The primary responsibility for credit risk monitoring resides with the unit responsible for the client relationship, i.e. Lending, Treasury and Special Credits, in cooperation with Credit & Analysis. For sovereign credit risk, Credit & Analysis is responsible for monitoring the development of the external ratings (Guidelines for credit counterparty monitoring and reporting). Risk Management is responsible for regular reporting to the Board of Directors on the Bank's risk position in relation to established limits.

3.2.3.5.1 Counterparty level

Lending exposures

All credit exposures are subject to continuous monitoring of contractual compliance and events/signals that could potentially lead to or indicate a material change in risk. In addition, an annual follow-up (AFU) is conducted on the entire loan portfolio. The AFU includes a follow-up of the customer relationship, policy and contractual compliance as well as a credit risk review. The annual follow-up is presented to the Credit Committee and reported the Board of Directors.

Large exposures, defined as the 20 largest non-sovereign exposures and the 20 largest economic capital consumers, are subject to individual and more thorough analysis. The same applies to high-risk counterparties defined as counterparties in risk classes PD14-16 [4] and watch-listed counterparties.

Member country local and regional governments (LRGs) are subject to review every third year (including a review of the institutional framework). Municipalities outside member countries follow the same principles, however LRG's rated PD10 or worse are analysed annually.

The monitoring of sovereign counterparty credit risk focuses on rating actions taken by external rating agencies (Country Risk – Assignment, Monitoring, and Reporting process).

Compliance with maximum counterparty limits in the lending operations is monitored by the Risk Management unit. Exposure in excess of maximum limits may occur e.g. due to downgrade of a counterparty rating. Limit breaches are reported to the Board of Directors.

Treasury exposures

All exposures are subject to continuous monitoring of events/signals that could potentially lead to or indicate a material change in risk. At a minimum every second year, the counterparties are analysed and the risk class validated. Counterparties with a risk class weaker than EL6 [5] are prioritised. The follow-up is presented to the Credit Committee.

Monitoring of compliance with limits for counterparty credit exposure is carried out by the Risk Management unit on a daily basis against applicable limits. Limit breaches are reported to senior management and the Finance Committee, as well as to the Board of Directors if the maximum exposure limit is exceeded.

Watch-listed exposures

Following the identification of a seriously deteriorated debt repayment capacity and/or a serious deterioration in the financial standing, the counterparty is placed on the watch-list and becomes subject to specific watch-list monitoring. All loans, borrowers and Treasury counterparties in risk class PD17 and/or EL17 [4,5] or below shall be proposed for the watch-list. The Credit Committee decides on the watch-listing of a counterparty. Watch-listed counterparties are reviewed by the Credit Committee at agreed intervals and reported to the Board of Directors.

If a credit exposure requires the expertise of specialists in workout and restructuring it will be transferred to the Special Credit unit. The unit's primary objective is to take over

[4] Rating scale: PD1 to PD20 and D1,D2; PD1-10 correspond to investment grade ratings by S&P and Moody's

[5] Risk class scale: EL1 to EL20, D: EL1 - 10 correspond to investment grade ratings by S&P and Moody's

responsibility for distressed loans from Lending and devote sufficient time and effort to the individual case in order that the Bank may recover all or as much as possible of distressed loans outstanding.

3.2.3.5.2 Portfolio level

Monitoring of the credit risk development at portfolio level is carried out regularly by Risk Management, which is responsible for analysing and reporting the development to the Executive Committee, the Finance Committee, ALCO and the Board of Directors. The reporting includes, among others, an analysis of the aggregate credit risk exposure, credit risk concentrations, changes in the risk profile, exposure against portfolio risk limits and development of economic capital.

3.2.3.6 Risk-based pricing

The Statutes stipulate that the Bank shall operate according to sound banking principles and aim for a profit allowing the formation of reserves and reasonable return on capital. Loans and guarantees are priced to cover the Bank's cost of funds, administration costs, the cost of the risk involved in the transaction and the cost of capital employed. For loan pricing purposes the Bank uses a pricing tool that enables calculation of the minimum earnings required on a loan in order to cover all lending related costs and an appropriate return for the level of risk assumed. Internal credit risk ratings and associated risk parameters, as well as the structure of the transaction are key input factors into the pricing tool.

3.2.3.7 Impairment of financial assets

The Bank assesses impairment provisioning requirements for financial assets and commitments in accordance with the International Financial Reporting Standard IFRS 9.

IFRS 9 takes a forward-looking approach to recognising credit losses. Impairment requirements are based on an expected credit loss (ECL) model, which takes into account a broad range of information, including forward-looking macroeconomic factors. The main principles applied for calculating and reporting impairments based on ECL are set out in the Expected Credit Loss Framework.

Expected credit losses are measured by allocating the financial asset into three categories at each reporting date:

Stage 1: Financial assets, which are performing and no significant increase in credit risk has been identified since initial recognition
Stage 2: Financial assets, which are performing but a significant increase in credit risk has been identified since initial recognition
Stage 3: Non-performing financial assets

For assets in Stage 1 impairment allowances are made to reflect 12-month ECL. For assets in Stage 2 and 3, impairment allowances are made to reflect ECL during the remaining lifetime of the assets.

The need for individual loss provisioning is assessed for non-performing financial assets (Stage 3). Exposures to counterparties in the default rating classes (D1 or D2) are classified as non-performing.

- Default class D1 applies when the Bank considers that the counterparty is unlikely to pay its credit obligations in full without recourse by the Bank to actions such as realising security

- Default class D2 applies when the counterparty is past due by more than 90 days[6] on any material obligation, or earlier by management decision if it is considered highly likely that a material overdue payment will remain unsettled for more than 90 days.

The individual loss allowance is assessed using one or several methods (i.a. discounted cash-flow based assessment, mark-to-market and secondary market price quotes) as set out in the Non-Performing Exposures Framework.

The Credit Committee approves the impairment allowances, including the model-based ECL calculations, additional management overlay adjustments, if any, and the macro-financial scenarios used in the model.

[6] 180 days in case of sovereign lending exposure to NIB's member countries or countries with which the Bank has an existing framework agreement in place

3.3 Market risk

3.3.1 Definition and sources of risk

The Bank defines market risk as the risk of valuation loss or reduction in expected earnings stemming from adverse fluctuations in exchange rates, interest rates, credit spreads and cross-currency basis spreads.

Market risks predominantly arise from the Bank's core business activities and the liquidity portfolio needed to support these activities. The Bank's strategy is to obtain cost-efficient funding from diversified sources and provide lending that is tailored to the needs of its customers. This gives rise to foreign exchange risk and structural interest rate risk due to mismatches in the Bank's assets and liabilities in terms of currency composition, maturity profile and interest rate characteristics. Cross-currency basis risk stems from the hedging techniques used by the Bank to mitigate the above risks. This risk is inherent in transactions exchanging foreign currencies at a future point in time and is mainly driven by liquidity supply and demand in those currencies.

The Bank's securities portfolio held for liquidity purposes is exposed to interest rate risk and credit spread risk, i.e. potential decline in market value due to perceived change in the credit quality of the issuers of the securities held in the portfolio.

The Bank maintains a small-size trading portfolio allocated to active position management for the purpose of achieving additional earnings and for monitoring market signals in the international capital markets. The Bank's tolerance for interest rate risk, credit spread risk, cross-currency basis risk and volatility risk in the trading portfolio is low.

3.3.2 Key responsibilities

The Board of Directors annually reviews and approves maximum limits for exposure to market risks. The Board receives reports on the Bank's market risk positions at its regular meetings.

The Finance Committee oversees the activities that give rise to market risk exposure and establishes operating guidelines including various levels of operational limits within the maximum limits set by the Board.

ALCO oversees market risk exposures as part of the Bank's overall risk picture.

The Bank's market risks are managed by Treasury.

The Risk Management unit provides independent oversight of all significant market risks, supporting the Finance Committee, ALCO and Treasury with risk measurement, analysis, daily monitoring and reporting.

3.3.3 Market risk management

The Bank manages market risks by hedging against foreign exchange risk and interest rate risk with the objective to protect its earnings and the economic value of its assets and liabilities. Foreign exchange risk is practically fully hedged. Interest rate risk deriving from mismatches between funding and lending is kept at a modest level. The Bank's tolerance for interest rate risk and credit spread risk pertains to the earnings expectations set for the liquidity portfolio.

As part of its structured funding transactions, the Bank may use financial instruments linked to other market risk factors than the above. A prerequisite is that such transactions are completely hedged with derivatives and that the Bank is able to valuate and measure the risks involved in the derivatives. The instruments that the Bank is authorised to use are laid out in Authorised Instruments in Treasury Operations (Appendix 10).

According to the Statutes, the Bank may when specific need arises, acquire shares or other assets, in support of its business or to protect its claims.

3.3.3.1 Foreign exchange risk

The Statutes require that the Bank shall, to the extent practicable, protect itself against the risk of exchange rate losses. The Bank's operating principle is to hedge foreign exchange risk by the use of derivatives to convert its multi-currency borrowings into the primary lending currencies. Investments in assets held for liquidity purposes are made in the primary lending currencies. As a rule the Bank does not hedge its future net interest margin against movements in foreign exchange rates.

In compliance with the statutory requirement, limits for acceptable foreign exchange risk are kept low compared to the Bank's equity. Limits have been set to restrict the overnight open positions, i.e. the net nominal value of assets and liabilities in each foreign currency (Limits for Exchange Rate Risk, Appendix 8).

3.3.3.2 Cross-currency basis risk

Cross-currency basis risk is embedded in the currency swaps that the Bank uses to hedge foreign exchange rate risk in future cash flows from its lending and borrowing and for liquidity management purposes. Changes in the cross currency basis affect the mark-to-market valuations of the swaps, which gives rise to volatility in the Bank's comprehensive income. Cross-currency basis risk is managed within the Bank's economic capital framework and reflected in the capital requirement for market risk. Counterparty credit risk inherent in the swaps is mitigated by collateral agreements (CSAs) with the swap counterparties.

3.3.3.3 Interest rate risk

The Bank manages interest rate risk by using derivatives to convert fixed rate funding into floating rate liabilities. Fixed rate lending that is not match-funded, is converted to floating rate receivables. This portfolio hedging approach ensures that interest rate risk between lending and funding in each currency remains low. The majority of the Bank's interest rate risk, therefore, stems from the portfolio of liquid assets.

The Bank measures and manages interest rate risk by estimating the sensitivity of the economic value of its balance sheet to an interest rate shock. The sensitivity is measured by means of basis point value (BPV) quantifying the impact of a one basis point parallel increase in interest rates on the present value of interest-bearing assets and liabilities.

The Bank measures its structural net interest income risk by estimating the sensitivity of the accumulated net interest income during the next twelve months to changes in the level of interest rates.

Maximum limits have been set for the acceptable exposure to interest rate risk both at an aggregate balance sheet level and at portfolio level. Individual BPV limits have been defined for EUR, USD and for the Nordic currencies, whereas a combined limit applies for all other currencies (Limits for Interest Rate Risk Appendix 7).

The trading portfolio is subject to a low Value-at-Risk limit and a stop-loss limit (Trading portfolio Limits, Appendix 8a). If the cumulative loss of the portfolio reaches the stop-loss limit, all open positions must be closed and trading is suspended for the rest of the calendar year. All positions in the trading portfolio are included in and monitored under the Bank's market risk limits.

3.3.3.4 Credit spread risk

The Bank manages its exposure to credit spread risk by calculating the sensitivity of its marketable securities to credit spread movements. The sensitivity is measured by means of Credit Spread Basis Point Value (Spread BPV) quantifying the impact of one basis point increase in credit spreads on the present value of the assets.

Limits have been defined to restrict the decrease in asset value to acceptable levels in accordance with the Bank's willingness to take risk in its portfolio of marketable securities. The Bank has set an overall limit for credit spread risk with specific sub-limits defined for various asset classes and portfolios (Limits for Credit Spread Basis Point Value, Appendix 8).

To ensure that the liquidity portfolio maintains its market value and liquidity even under severe market conditions, the Bank has set limits to control the asset quality of the portfolio i.a. by defining minimum requirements for counterparty ratings (Limits for the Liquidity Buffer, Appendix 9).

3.4 Liquidity risk

3.4.1 Definition and sources of risk

The Bank defines liquidity risk as the risk of incurring losses due to an inability to meet payment obligations in a timely manner when they become due. The Bank categorises liquidity risk into *funding liquidity risk*, which occurs when payment obligations cannot be fulfilled because of an inability to obtain new funding, and *market liquidity risk*, which occurs when the Bank is unable to sell or transform assets in the liquidity buffer into cash without significant losses.

The Bank's business model gives rise to liquidity risk mainly through maturity mismatches between assets (loans and treasury investments) and liabilities (borrowing and equity).

3.4.2 Key responsibilities

The Board of Directors approves the Liquidity Policy, which outlines the key principles for the Bank's liquidity management. The Board receives regular reports on the liquidity position and the performance against approved limits and targets.

The President is responsible for ensuring that the policy is effectively implemented and for establishing prudent liquidity risk management and control procedures. The President also approves the methodology for liquidity stress testing. Furthermore, it is the President's responsibility to inform the Board in case the liquidity contingency plan is activated.

The liquidity position and adherence to exposure limits is managed by Treasury and monitored by Risk Management on a daily basis.

The Finance Committee and ALCO oversee the development of the Bank's funding and liquidity position and decide on liquidity risk related matters in accordance with their respective mandates.

3.4.3 Liquidity risk management

Key objectives for the Bank's liquidity risk management are to ensure that the liquidity position is strong enough to (1) enable the Bank to carry out its core activities for a defined period of time under stressed market conditions without access to new funding; (2) secure the highest possible credit rating by international rating agencies; (3) fulfil the liquidity coverage ratio (LCR) and net stable funding ratio (NSFR) requirements as specified in the Capital Requirements Regulation of the European Union.

Measuring the liquidity requirement

The liquidity requirement for various time horizons is determined based on analysis and stress testing of future contractual cash flows. A key metric applied is the survival horizon, which measures how long the Bank is able to fulfil its payment obligations in a severe stress scenario. The target survival horizon is twelve months, which means that the Bank is able to meet its payment obligations and continue its business operations without disruption for the coming twelve months under stressed conditions. The minimum requirement is that the survival horizon must at all times exceed nine months. The stress scenario includes, among others, the assumption of payment disruptions in the loan portfolio, no access to market funding, early termination of all callable funding transactions and severe decline of asset value in the liquidity buffer as laid out in the Framework for Liquidity Stress Testing.

Liquidity buffer

To ensure sufficient liquidity in stressed financial conditions, the Bank holds a liquidity reserve. The reserve comprises unencumbered cash, deposits and securities mainly denominated in EUR, USD and the Nordic currencies. In order to ensure that the market value and liquidity of the buffer is preserved during adverse market conditions, the Bank has set strict rules for the composition of the buffer. As such, the buffer must include a minimum level of High Quality Liquid Assets as defined in the EU capital requirement regulation and a minimum level of assets in the internal rating categories corresponding to at least AA- by S&P and Aa3 by Moody's, (Limits for the Liquidity Buffer, Appendix 9). Furthermore, the buffer must comprise a certain level of assets eligible as repo collateral in central banks. The Bank does not have direct access to central bank repo facilities.

The maturity profile of the liquidity buffer is structured to fulfil the Bank's requirement that the expected net cash outflow during the next three months must be covered by maturing investments in the liquidity buffer.

Funding strategy

Diversification is a key objective of the Bank's funding and liquidity management. The Bank strives to diversify its borrowing in terms of currencies, maturities, instruments and investor types in order to avoid excessive reliance on individual markets and funding sources. Through regular benchmark issues, the Bank aims to secure broad market access. The annual funding plan is based on the projected twelve-month liquidity requirement and the projected size of the liquidity buffer. The funding plan is regularly adjusted to reflect changes in the liquidity requirement.

Contingency plan

The Bank has a contingency plan in place which defines the actions to be taken should the Bank encounter a liquidity shortfall in an emergency situation. The President decides on the activation of the contingency plan and subsequently informs the Board of Directors.

3.5 Operational risk

3.5.1 Definition and sources of risk

The Bank defines operational risk as the risk of direct or indirect losses or damaged reputation due to failure attributable to technology, employees, processes, procedures or physical arrangements, including external events and legal risks.

The Bank is exposed to operational risk in all its activities.

3.5.2 Key responsibilities

The Board of Directors approves the Operational Risk Management Policy which sets out the key principles of the Bank's operational risk management and control. Based on regular reporting, the Board oversees the Bank's operational risks.

The President has the ultimate responsibility for ensuring that appropriate operational risk management practices are in place and operating effectively in accordance with the operational risk management policy and the standards set out in the Operational Risk Management Framework.

In the day-to-day operations the three lines of defence model ensures accountability and defines the roles and responsibilities for operational risk management. The first line of defence are the respective Bank units, who own the risks in their operations. It is the responsibility of line managers to ensure that operational risks are identified, communicated and understood, that appropriate actions are taken to mitigate losses and that incidents are reported. The second line of defence is the Risk Management unit, which is responsible for bank-wide monitoring and reporting on events and actual losses to ALCO and the Board of Directors. The third line of defence is Internal Audit, which provides an independent evaluation of the controls, risk management and governance processes.

3.5.3 Operational risk management

The Bank's operational risk management focuses on proactive measures in order to ensure business continuity, the accuracy of information used internally and reported externally, a competent and well-informed staff and its adherence to established rules and procedures as well as on security arrangements to protect the physical and ICT infrastructure of the Bank.

- For the purpose of managing operational risk, the Bank's activities have been divided into a set of core business processes and sub-processes with designated **process owners.** The process owners are responsible for identifying, reporting and responding to risks inherent in the processes.

- Data on **incidents** is collected in order to gain information on the type, cause, frequency and interdependence of various risk events. Incidents reported are reviewed and categorised by Risk Management. The Bank has adopted a categorisation based on the Basel Committee's event types comprising (A) internal fraud; (B) external fraud; (C) clients, products and business practices; (D) business disruption and system failures; (D1) execution, delivery and process management; (D2) damage to physical assets; (E) employment practices and workplace safety**.**

- Regular **risk and control self-assessment** is conducted for each core process. The process owners and key personnel involved in the process, under the stewardship of Risk Management, seek to detect potential risk exposures or threats to the efficient functioning of the process and assess the adequacy of risk mitigation techniques used. Potential risks are assessed according to the likelihood of occurrence and impact.

- **New products** and business initiatives as well as major changes to existing products are processed carefully. Prior to launching a new product, all relevant risks are analysed and processes and controls established to manage the risks involved. The New Product and Structure Committee, with representation from relevant business and support functions, carry the main responsibility for assessing new products and initiatives. All new types of transactions introducing operational or financial risks must be authorised by the Executive Committee after the recommendation of the New Product and Structure Committee.

- **Outsourcing** requires thorough documentation of the activity to be outsourced and an analysis of risks involved. The Bank seeks to maintain the operational risks related to outsourced activities at the same level as if the activities were performed in-house.

- The Bank's **legal risks** relate to inadequate or inefficient documentation, issues of legal capacity, enforceability and the applicability of national laws and dispute resolution mechanisms in the jurisdictions under which it operates. These risks are mitigated by Legal through e.g. established procedures and legal advice, key clauses and the legal review of all contractual documents and other binding documents of the Bank, irrespective of whether they relate to the operational or the administrative activities of the Bank.

  In its documentation of lending operations as well as in procurement contracts for the Bank's own purchases, the Bank uses key clauses developed over the years. For the documentation of treasury transactions, the Bank relies on standardised documentation commonly accepted in the market. Concerning borrowing, the Bank uses its own standard documentation developed based upon the Bank's Statutes and practise that has evolved over time.

- The Bank considers **Information and Communication Technology (ICT)** as one of its key focus areas in order to achieve operational excellence, reduce operational risk and reach a high level of cost efficiency aligned with the Bank's business strategy. The Bank aims at a high-quality ICT architecture that ensures performance stability and flexibility and which is adapted to the transaction volumes of the Bank.

  As the Bank's operations are largely based on information processing, much emphasis is put on information technology security. The overall purpose of the Bank's ICT security policy is to ensure an uninterrupted, secure and undisturbed use of information and communication systems. ICT security covers all parts of the ICT environment, including hardware, software, networks, databases and ICT services as well as ICT administration, ICT management, ICT operations and other ICT-related work processes.

- The Bank's continuity planning focuses on taking preventive measures to minimise the consequences of a serious disruption of business operations. The principles for business continuity management are laid out in the Business Continuity Policy, Security Policy and the Disaster Recovery Plan maintained by the Business Continuity and Security unit. The Bank's business continuity management requires that all business units develop business continuity capabilities for their respective functions with the aim to minimise the impact of unavailability of key resources such as staff, information, ICT systems, networks and workspace.

3.6 Compliance risk

3.6.1 Definition and sources of risk

Compliance risk is the risk of legal or regulatory sanctions, material financial loss, or loss to reputation due to failure to comply with laws, rules and standards.

The Bank faces compliance risk in all its business activities.

3.6.2 Key responsibilities

The Board of Directors is responsible for overseeing the compliance risk management in the Bank based on regular reporting. The Board of Directors approves the Compliance, Integrity and Anti-corruption Policy, the overarching framework on compliance risk.

The President is responsible for communicating and implementing the Compliance, Integrity and Anti-corruption Policy and for ensuring that it is observed.

Members of senior management are responsible for the day to day management of compliance risk and for ensuring that procedures and guidelines regarding the Bank's integrity and ethical standards are adhered to within their area of responsibility.

The Office of the Chief Compliance Officer (OCCO) oversees and coordinates matters relating to compliance and integrity risks, including reputational risks and provides independent expert advice to the Bank's management and Board of Directors in compliance and integrity matters.

Allegations of prohibited practices, misconduct and complaints in relation to NIB financed projects or counterparties and other activities of the Bank are investigated by OCCO. The OCCO reports its findings of investigations of external parties to an independent Sanctions Panel for decisions on sanctions (incl. debarments).

The Bank has Code of Conduct for the Board of Directors and the President, the members of the Control Committee and for Bank staff. The codes of conduct articulate the values, duties and obligations as well as ethical standards that the Bank expects of its members of the governing bodies and staff. The codes of conduct and the Policy on handling Inside Information and prevention of Market Abuse are intended to prevent conflicts of interest, to prohibit the use of insider information, and to provide guidance for the handling of confidential information, and disclosure of financial and business interests.

3.6.3 Compliance risk management

NIB is committed to follow best practices and market standards in the areas of accountability, transparency and business ethics. The Bank aims at a zero tolerance of misconduct and corruption.

In the day-to-day operations the three lines of defence model defines the roles and responsibilities for compliance and integrity risk in the Bank. The first line of defence lies with the respective Bank departments and units, which are responsible for ensuring that compliance risks are identified, understood and reported to the decision making bodies of the Bank and to OCCO. The second line of defence lies with OCCO, which assesses and monitors the compliance and integrity risks and coordinates its control activities with the Risk Management Unit. Internal Audit is the third line of defence.

In managing compliance and integrity risks, the Bank places particular emphasis on preventing fraud and corruption, money laundering and the financing of international terrorism as well as tax fraud and tax evasion.

The principles related to managing integrity and reputational risks in connection with the Bank's operations are set out in the Integrity Due Diligence (IDD) Policy. Comprehensive internal screening procedures have been established to identify integrity and reputational risks relating to new customers and counterparties. In respect of existing customers this is carried out in the annual follow-up and more frequently when required.

Investigations of alleged prohibited practices, misconduct and complaints relating to non-compliance with the Bank's polices, and consequent actions, are undertaken in accordance with the Investigations and Enforcement Policy. The Speaking-up and Whistleblowing Policy encourages staff to report prohibited practices, including fraud and corruption, and any other form of wrongdoing, and provides whistle blowers with protection against retaliation. The Bank's procedures are aligned with the International Financial Institutions (IFI) Uniform Framework for Preventing and Combating Fraud and Corruption, which the Bank has endorsed.

Risk governance structure

APPENDIX A