Report of the Cover Pool Monitor of the Covered Bond Programme at Slovenská sporiteľňa, a. s. for 2021

23 April 2022

SLOVENSKÁ = sporiteľňa

#### **Reason for Report Submission**

This report is prepared and submitted to the National Bank of Slovakia (hereinafter "NBS") on the basis of the Act No 483/2001 on banks and on amendments to certain laws, as amended (hereinafter referred to as "Banks Act") laying down the obligation of the Cover Pool Monitor of the covered bond programme (hereinafter referred to as "Monitor") to submit a report on the Covered Bond Programme (hereinafter referred to as "Report") for the previous year by 30 April of the current calendar year.

## **Contents of the Submitted Report**

The Report contains mainly information on the Covered Bond Programme (hereinafter referred to as "CB Programme") of Slovenská sporiteľňa, a.s. (hereinafter referred to as "Bank"), including the:

- a) Number, volume, yields and maturities of issued covered bonds (hereinafter referred to as "CBs") and assignment of primary assets and substitution assets to the issues;
- b) Volume of assets in the cover pool and CBs in EUR or in a foreign currency;
- c) Cover pool structure;
- d) Coverage ratio;
- e) Average amounts and maturities of the underlying assets; fixation times and weighted interest rates; categorisation of the weighted interest rates and credit volumes by fixation time; categorisation of the underlying assets by maturity;
- f) Volume of defaulted mortgage loans and volume of mortgage loans excluded from the cover pool;
- g) Reasons for substantial changes in adding or excluding assets to and from the cover pool;
- h) Structure of the real estate by which the underlying assets in the cover pool are secured, i.e. breakdown into family houses, flats, building land plots and buildings under construction,
- i) Proportional distribution of the real estate/collateral assets by which the underlying assets are secured across the territorial divisions of the Slovak Republic (hereinafter referred to as "SR") and the loan-to-value ratio:
- j) Method of calculation and amount of estimated liabilities or costs of the Bank;
- k) Methodology and results of stress testing,
- I) Monitor's activity and NBS supervision in relation to the CB Programme for the last calendar year; and
- m) Other facts related to the activity of the Bank being the CB issuer.

# **Opinion of the Monitor**

In the course of 2021, the Bank performed activities related to the CB Programme in compliance with the Banks Act, Measure No 13 of NBS of 6 November 2018 on the register of covered bonds (hereinafter "NBS Measure No 13") and other related legislation of general application. As part of its internal processes and procedures, the Bank created the required organisational, technical, legal and personnel conditions in order to comply with the requirements imposed on a CB issuer by the respective provisions of the Banks Act.

My opinion is based on the findings identified in executing the supervision and inspection of the operation of the CB Programme at the Bank, mainly with regard to compliance with Section 79 of the Banks Act, which I performed on a regular monthly basis. I performed the Monitor's activity autonomously, independently and impartially and in coordination with the Bank, which allowed me to inspect the required records, documents, systems, and premises related to the CB Programme in the course of the year. In case of my absence and during the monthly supervision and inspection I also cooperated with my deputy, Ing. Soňa Vágnerová.

a) Number, volume, yields and maturities of the CB issues and assignment of primary assets and substitution assets to the issues

The Bank did not issue any covered bond in 2021.

 $Table \ 1 - Assignment \ of \ primary \ assets \ and \ substitution \ assets \ to \ the \ issues \ (no \ substitution \ assets \ were \ recorded \ at \ the$ 

Bank as of 31/12/2021)

| Bank as of 31/12/2021) |                               |                                      |                              |  |  |
|------------------------|-------------------------------|--------------------------------------|------------------------------|--|--|
| Issue (ISIN)           | Issue amount<br>(EUR million) | Primary asset<br>value (Eur million) | Weighted LTV of<br>issue (%) | Proportion of<br>primary asset<br>value to issue<br>amount (%) |  |
| SK4120010489           | 35,0                          | 61,9                                 | 43,8                         | 176,9  |  |
| SK4120009895           | 11,0                          | 19,6                                 | 42,7                         | 178,4  |  |
| SK4120013020           | 5,0                           | 9,0                                  | 43,5                         | 180,6  |  |
| SK4120010968           | 10,0                          | 17,7                                 | 43,6                         | 177,2  |  |
| SK4120013392           | 150,0                         | 265,3                                | 43,3                         | 176,9  |  |
| SK4120014812           | 250,0                         | 442,4                                | 43,5                         | 176,9  |  |
| SK4120008947           | 4,4                           | 7,7                                  | 42,0                         | 178,0  |  |
| SK4120012683           | 100,0                         | 177,0                                | 43,4                         | 177,0  |  |
| SK4120010950           | 10,0                          | 17,8                                 | 44,5                         | 178,0  |  |
| SK4120014507           | 250,0                         | 442,7                                | 43,4                         | 177,1  |  |
| SK4120011586           | 9,0                           | 16,0                                 | 43,5                         | 178,0  |  |
| SK4000015400           | 500,0                         | 884,9                                | 43,5                         | 177,0  |  |
| SK4120005505           | 16,6                          | 29,6                                 | 43,0                         | 178,4  |  |
| SK4000017190           | 500,0                         | 884,8                                | 43,4                         | 177,0  |  |
| SK4120009218           | 6,6                           | 11,8                                 | 44,1                         | 179,1  |  |
| SK4120009804           | 4,9                           | 8,8                                  | 43,7                         | 182,4  |  |

b) Volume of primary assets in the cover pool and CBs in EUR or in a foreign currency

Table 2 - Volume of primary assets and covered bonds, EUR million

| Item*          | 12/2020 | 12/2021 |  |
|----------------|---------|---------|--|
| Primary assets | 3 446,7 | 3 297,1 |  |
| Covered bonds  | 2 125,8 | 1 862,4 |  |

<sup>\*</sup> SLSP, a.s. records only primary assets and covered bonds denominated in EUR

The rate of coverage of the total nominal value of issued CBs together with pro-rata interest yields by the cover pool assets is at least equal to the coverage ratio laid down in Section 69 of the Banks Act (105.0%).

# c) Cover pool structure

Table 3 - Cover pool change, EUR million

| rable 5 Cover poor change, Low million |         |         |  |  |
|--|---------|---------|--|--|
| Item                                   | 12/2020 | 12/2021 |  |  |
| Cover pool                             | 3 571,5 | 3 417,7 |  |  |
| Primary assets                         | 3 446,7 | 3 297,1 |  |  |
| Substitution assets                    | -       | -       |  |  |
| Hedging derivatives                    | -       | -       |  |  |
| Liquid assets                          | 124,7   | 120,6   |  |  |

The Bank meets the requirements for the cover pool structure in compliance with the Banks Act.

## d) Coverage ratio

As of 31/12/2021, the coverage ratio is 183.2%, which highly exceeds the required 105.0% and 107.5%, respectively.

Table 4 - Coverage ratio change, in %

| Item           | 12/2020 | 12/2021 |
|----------------|---------|---------|
| Coverage ratio | 167,8   | 183,2   |

e) average amounts and maturities of primary assets; fixation times and weighted interest rates; categorisation of weighted interest rates and credit volumes by fixation time; categorisation of primary assets by maturity

Table 5 - Characteristics of primary assets

| able b characteristics or primary assets |          |          |  |  |
|--|----------|----------|--|--|
| Item                                     | 12/2020  | 12/2021  |  |  |
| Average volume(EUR million)              | 39 848,0 | 39 524,0 |  |  |
| Maturity (year)                          | 19,9     | 19,5     |  |  |
| Fixation period (year)                   | 4,4      | 4,6      |  |  |
| Wighted IR (%)                           | 1,44     | 1,27     |  |  |

Table 6 - Categorisation of weighted interest rates and credit volumes by fixation time, EUR million

| Interest rate type      | Primary<br>assets<br>(mil.eur) | Weighted IR(%) |
|-------------------------|--------------------------------|----------------|
| Variable                | -                              | -              |
| Fixed, up to 1 year     | 34,2                           | 1,34           |
| Fixed, 1 - 3 years      | 911,3                          | 1,26           |
| Fixed, 3 - 5 years      | 2 261,9                        | 1,26           |
| Fixed, 5 - 10 years     | 84,2                           | 1,37           |
| Fixed, over 10<br>years | 5,5                            | 4,35           |
| Total                   | 3 297,1                        | 1,27           |

Table 7 - Categorisation of primary assets by residual maturity

| by residual indicativy |           |  |  |  |
|------------------------|-----------|--|--|--|
| Residual               | Primary   |  |  |  |
| maturity of            | assets    |  |  |  |
| primary assets         | (mil.eur) |  |  |  |
| 0 to 1 year            | 2,2       |  |  |  |
| 1 to 2 years           | 6,6       |  |  |  |
| 2 to 5 years           | 74,9      |  |  |  |
| 5 to 10 years          | 306,0     |  |  |  |
| 10 to 15 years         | 512,3     |  |  |  |
| 15 to 20 years         | 674,8     |  |  |  |
| 20 to 25 years         | 847,7     |  |  |  |
| 25 to 30 years         | 872,6     |  |  |  |
| Total                  | 3 297,1   |  |  |  |
|                        |           |  |  |  |

f) Volume of defaulted mortgage loans and volume of mortgage loans excluded from the cover pool

Table 8 - Excluded and defaulted mortgage loans, EUR million

|                                |         | 30      |
|--------------------------------|---------|---------|
| Item (EUR million)             | 12/2020 | 12/2021 |
| Total exclusions               | 67,0    | 139,6   |
| Exclusions due to<br>repayment | 44,9    | 48,2    |
| Exclusions due to<br>default   | 0,7     | 1,6     |

The change in the "Total exclusions" item is due to the CBR management based on internal criteria, primarily the reduction of the required LTV of the cover pool asset portfolio.

g) Reasons for substantial changes in adding or excluding assets to and from the cover pool

Primary assets were excluded from the cover pool for the following reasons:

- Non-compliance with the basic criteria for including an primary asset in the covered bond register (hereinafter "CBR"):
  - Mortgage loan repayment term exceeding 30 years;
  - Borrower deemed to be in default (as per the default criteria laid down in Article 178 of the Regulation of the European Parliament and of the Council (EU) No 575/2013, namely "the obligor is past due more than 90 days on any material credit obligation"). The Bank chose to take a significantly more responsible approach and adopted a stricter criterion of 30 days for primary assets to be added to the cover pool;
  - Mortgage loan not secured by residential real estate, as required by the Act No 90/2016 on housing loans and on amendments to certain laws, as amended;
  - The loan-to-value (LTV) ratio, expressing the ratio of the outstanding mortgage loan principal amount to the real estate collateral value, which must not be higher than 80% for covered bonds issued after 1 January 2018 and 70% for re-registered mortgage bonds, is not met. The Bank's internal limit is 70% for all mortgage loans entered in the CBR.
- 2) Non-compliance with the conditions arising from the set of additional internal criteria, or application of internal criteria for the management of cover pool assets. Since this information is considered confidential from the Bank's perspective, it is not specifically covered in this Report; nevertheless, I consider the introduction and application of the internal criteria to provide relevant additional protection for investors.
- 3) With effect from 30/06/2019, the Bank includes in the CBR only mortgage loans supported by an expert opinion/appraisal (Articles 125, 208 and 229 of the Regulation of the European Parliament and of the Council (EU) No 575/2013) and other types or valuation have been excluded from the criteria for inclusion of a mortgage loan in the CBR.
- 4) Potential low quality of data, arising mainly from non-compliance with the Banks Act and the NBS Measure No 13.
- 5) Premature/Early loan repayment.

In 2021, the Bank did not make any substantial changes in the addition or exclusion of assets to and from the cover pool;

h) Structure of the real estate by which the primary assets in the cover pool are secured, i.e. breakdown into family houses, flats, building land plots and buildings under construction

Table 9 - Structure of the real estate by which the primary assets in the cover pool are secured: type, volume and ratio as of 31/12/2021

| Item                            | Real estate<br>value (EUR<br>milion) | Primary assets<br>(EUR milion) | Proportion of<br>primary assets<br>(%) |  |
|---------------------------------|--------------------------------------|--------------------------------|--|--|
| Multi-family houses -<br>flats  | 3 107,8                              | 1 241,0                        | 37,6                                   |  |
| Single-family houses            | 5 324,3                              | 1 809,3                        | 54,9                                   |  |
| Buildings under<br>construction | 614,7                                | 246,8                          | 7,5                                    |  |
| Total                           | 9 046,8                              | 3 297,1                        |  |  |

Primary assets secured by a building land plot collateral are not included in the CBR.

i) Proportional distribution of the real estate by which the primary assets are secured across the territorial divisions of the SR and LTV ratios

Table 10 - Distribution of the real estate by territorial division of the SR (region) and by LTV ratio as of 31/12/2021

| Region   | Primary<br>assets<br>(mil.eur) | Distribution<br>percentage(%) | Weighted LTV<br>(%) |
|--|--------------------------------|-------------------------------|---------------------|
| Bratislava City                                    | 450,9                          | 13,7                          | 43,4                |
| Banská Bystrica<br>region                          | 297,4                          | 9,0                           | 44,0                |
| Bratislava region<br>(excl. of<br>Bratislava city) | 311,3                          | 9,4                           | 43,1                |
| Košice region                                      | 379,8                          | 11,5                          | 43,6                |
| Nitra region                                       | 306,3                          | 9,3                           | 44,1                |
| Prešov region                                      | 335,6                          | 10,2                          | 43,4                |
| Trenčín region                                     | 376,9                          | 11,4                          | 43,4                |
| Tmava region                                       | 423,1                          | 12,8                          | 43,8                |
| Žilina region                                      | 415,8                          | 12,6                          | 42,6                |
| Total  | 3 297,1                        | 100,0                         | 43,5                |

j) Method of calculation and amount of estimated liabilities and expenses of the Bank

In 2021, the estimated liabilities and expenses of the Bank as a CB issuer incurred in connection with the Banks Act and directly related to the management and settlement of CBs vis-à-vis persons pursuing business under the Banks Act, or incurred on the basis of the terms and conditions of issue, included only the fees of the CB Programme Monitor and its deputy in the amounts determined by NBS.

k) Methodology and results of stress testing

Carrying out its statutory obligation under Section 76 of the Banks Act to perform stress testing at least once a year (before 31 March), the Bank performed the stress testing to identify possible changes in the coverage ratio over the data as of 31/12/2021. The stress testing was performed in compliance with Section 27 (7) of the Banks Act for the purposes of Internal Capital Adequacy Assessment (ICAAP). The bank has defined in its internal regulations the details of procedures for quantifying the various types of risk.

As of 31/12/2021, the Bank identified the following risks for the individual cover pool items:

| Cover pool          | Credit risk | Interest rate ri | FX risk | Liquidity risk | Counterparty r | Operational ris | Real estate pri<br>drop risk |
|---------------------|-------------|------------------|---------|----------------|----------------|-----------------|------------------------------|
| Primary assets      | Х           |                  | Х       |                |                | Х               | X                            |
| Substitution assets | X           | Х                | Х       | Х              | Х              |                 |                              |
| Hedging derivatives |             | Х                | Х       | Х              | Х              |                 |                              |
| Liquid assets       | X           | Х                | Х       | X              | Х              |                 |                              |

X-risk relevant to the given cover pool portion

X - risk relevant to the Bank

The Bank performed a one-year stress test, i.e. quantified the coverage ratio value in 2022 on the basis of scenarios prepared by the Market Research & Customer Experience Department for 2022 to 2024 and with the application of a 34.4% decline in residential real estate prices for 2022 for risks with the highest impact on the coverage ratio calculation. The Bank quantified the coverage ratio using a scenario based on the statutory requirements for primary assets of the cover pool (80% LTV value and a maximum of 90 days past due for a credit obligation). During the stress testing, the Bank did not consider the diversification effect between the individual types of risks, i.e. the total impact of the test scenario on the coverage ratio is the sum of impacts of the individual types of risks.

Based on the stress testing, there was a slight decline in the coverage ratio and its value, even after the stress testing, highly exceeds the statutory minimum level of 105.0%, as well as the higher level of coverage rate declared by the investor, namely 107.5%. According to the submitted analyses of cover pool stress testing as of 31/12/2021, the Bank ensures compliance with its obligations under the CB Programme sufficiently and securely, beyond statutory obligations.

The Bank treats the individual scenarios and results of the calculation of individual risks as confidential and, accordingly, they are not included in this Report.

I) Activity of the Monitor and NBS supervision in relation to the CB Programme for the last calendar year

During 2021, the Monitor and the Deputy Monitor of the CB Programme carried out the following activities:

- Monthly controls of the CBR consisting in checks of the underlying data kept in the CBR under the Banks Act, , including new CBR items effective as of 1 July 2019 on the basis of the NBS Measure No 13. Identified errors were reported to the Bank and corrections were subsequently checked. Continuous monitoring of the COVID-19 situation.
- Inspection of random samples of loan documentation for the mortgage loans included in the CBR;
- m) Other facts related to the operations of the Bank as a CB issuer
  - In line with its commitment, the Bank maintained a coverage ratio higher than defined in Section 69 of the Banks Act (105.0%), namely 107.5%. This higher coverage is specified and declared to the investors in the basic prospectus of the programme for issuing debt securities. In order to maintain the achieved CB rating and demonstrate the quality of the CB Programme, the value of the coverage ratio set as of 31/12/2021 is 108% as minimum;
  - Impact of Covid-19: the amount of the loans to which the Covid legislation was actively applied is EUR 5.4 million (109 loans, i.e. 0.16% of the total amount of primary assets); this amount does not materially affect the quality of CBR.

