Fitch Ratings	de Volksbank N	.V.				ES	G Relevance:			Ratings	Banks Navigator
Banks Ratings Navigator Navigator date: February 2019	Peer Ratings Operating Environment	Company Profile	Management & Strategy	Risk Appetite		Financi arnings & rofitability	al Profile Capitalisation & Leverage	Funding & Liquidity	Viability Rating	Support Rating Floor	Issuer Default Rating
Last rating action: 13 Nov 2018	ааа								aaa	AAA	AAA Stable
Sector Details:	aa+								aa+	AA+	AA+
Bank sector: Retail	aa								aa	AA	AA
Region: DM Europe	aa-								aa-	AA-	AA-
,	a+								a+	A+	A+
Country IDR: AAA Stable	a								а	A	A
Last action: 26 Oct 18 Affirmed	a-	T	T			Т.,			a-	A-	A- Stable
Country ceiling: AAA	bbb+								bbb+	BBB+	BBB+
Macro prudential indicator: 1	bbb			_		1		_	bbb	BBB	BBB
Bank systemic indicator: a	bbb-	-	-			-			bbb-	BBB-	BBB-
	bb+										
									bb+		BB+
Bank Rating History	bb								bb	BB	BB
Viability Rating (VR)	bb-								bb-	BB-	BB-
13 Nov 18 a- Affirmed	b+								b+	B+	B+
24 Nov 17 a- Upgrade	b								b	В	В
24 Feb 17 bbb+ Affirmed	b-								b-	B-	В-
									-	_	
Issuer Default Rating (IDR)	CCC+								CCC+	CCC+	CCC+
13 Nov 18 A- Stable Affirmed	ccc								ccc	CCC	CCC
24 Nov 17 A- Stable Upgrade	ccc-								ccc-	-222	-CCC-
24 Feb 17 BBB+ Positive Affirmed	сс								сс	сс	сс
Support Rating Floor (SRF)	c								с	с	с
13 Nov 18 NF Affirmed	f								f	NF	D or RD
24 Nov 17 NF Affirmed	Support Rating Floor			Value	Drivers & Sensitivities						
24 Feb 17 NF Affirmed	Typical D-SIB SRF for sovereign's rating level (as	ssuming high propensit	y)	A or A-	Focus on Low-Risk	De Volks	bank's ratings reflect th	ne bank's sound as	set quality and mode	erate risk appetite w	ith a focus on low-
Bar Chart Legend:	Actual country D-SIB SRF			NF	Residential Mortgage	risk resid	dential mortgage lending	g. They are constra	ained by the bank's c		
Vertical bars = VR range of Rating Factor	Support Rating Floor:			NF	Lending	franchise	e that lacks the breadth	of the three larger	Dutch banks.		
Bar Colors = Influence on final VR	Support Factors	Positive	Neutral	Negative	De Volksbank's impaired loans are low (1.5% of gross loans at end-June 2018) despite a one-off increas		one-off increase on				
Higher Influence	Sovereign ability to support system						y 2018 due to the adoption of IFRS 9. Like-for-like, the bank's asset quality is improving, helped by a				
Moderate Influence	Size of banking system relative to economy			\checkmark			perating environment a	ind conservative u	nderwriting.		
Lower Influence	Size of potential problem	\checkmark			We expect of		ect de Volksbank's reve	nue to remain pres	ssured by subdued lo	an growth, the low-r	ate environment,
Bar Arrows = Rating Factor Outlook	Structure of banking system			\checkmark	Revenue Headwinds		competition in the Dutch			essary build-up of M	IREL-eligible
	Liability structure of banking system		✓			liabilities	, which will weigh on th	e bank's funding c	OSIS.		
1 Evolving D Stable	Sovereign financial flexibility (for rating level)		\checkmark		Cost Efficiency Plan Key		De Volksbank's profitability is healthy despite the revenue headwinds, with operating profit/risk weighte				
Peer Ratings bars = Count of banks	Sovereign propensity to support system				Sustaining Profitability	assets (r	RWA) of 4.2% in 1H18.			bank's cost-efficiend	cy programme will
69 DM Europe Retail	Resolution legislation with senior debt bail-in			\checkmark		De crucia	al in safeguarding profit	ability as loan loss	es normalise.		
3 Netherlands Retail	Track record of banking sector support		✓		Low Risk-Weights on		De Volksbank's risk-weighted capital ratios compare well with Dutch banking peers', with a common ed				
Relevant Criteria & References	Government statements of support			✓	Mortgage Lending Tier 1 ratio of 34.3% at end loans.		tio of 34.3% at end-Jun	o of 34.3% at end-June 2018, partly as a consequence of low risk-weighting of residential mortgage			
Bank Rating Criteria (Oct 2018)	Sovereign propensity to support bank					IUdiis.					
Macro-Prudential Risk Monitor (Sep 2018)	Systemic importance		√			We believe the bank's minimum 4.25% leverage ratio target will help it preserve ample buffers over its capital requirements despite RWA inflation under Basel III end-game rules. The bank's leverage ratio at end-June 2018 (5.2%) is sound, in line with its retail banking profile.					
	Liability structure of bank		√		Sound Leverage						
	Ownership		✓		2010 (5.2%) is sound, in line with its retail banking profile.						
	Specifics of bank failure		✓			De Volksbank is predominantly deposit-funded, with a loans/deposits ratio of 104% at end-June 2018. The bank's funding mix is stable, but wholesale funding may be more confidence-sensitive than larger banks' with a more established presence in debt capital markets, in our view.					
Analysts	Policy banks				Mainly Funded by Deposi						a larger banks' with
Konstantin Yakimovich (+44 20 3530 1789)	Policy role										
Olivia Perney (+33 1 44 29 91 74)	Funding guarantees and legal status				Ratings Sensitive to	An upgrade is unlikely within the constraints of de Volksbank's franchise and business model. While not our					
	Government ownership				Changes in Risk Appetite		base case, the bank's ratings could come under pressure if risk appetite increases, for example through looser underwriting standards or an abrupt shift in business model.				inple through
] [

FitchRatings

de Volksbank N.V.

Credit-Relevant ESG Derivation

de Volksbank N.V. has 5 ESG potential rating drivers

de Volksbank N.V. has exposure to compliance risks including fair lending practices, mis-selling, repossession/foreclosure practices, consumer data protection (data secu low impact on the rating.

Governance is minimally relevant to the rating and is not currently a driver.

Environmental (E)

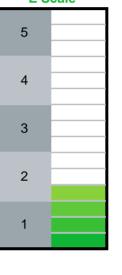
General Issues	E Score	Sector-Specific Issues	Reference	 E S	cale
GHG Emissions & Air Quality	1	n.a.	n.a.	5	
Energy Management	1	n.a.	n.a.	4	
Water & Wastewater Management	1	n.a.	n.a.	3	
Waste & Hazardous Materials Management; Ecological Impacts	1	n.a.	n.a.	2	
Exposure to Environmental Impacts	2	Impact of extreme weather events on assets and/or operations and corresponding risk appetite & management; catastrophe risk; credit concentrations	Company Profile; Management & Strategy; Risk Appetite; Asset Quality	1	

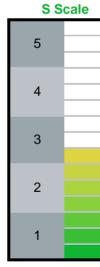
Social (S)

General Issues	S Score	Sector-Specific Issues	Reference
Human Rights, Community Relations, Access & Affordability	2	Services for underbanked and underserved communities: SME and community development programs; financial literacy programs	Company Profile; Management & Strategy; Risk Appetite
Customer Welfare - Fair Messaging, Privacy & Data Security	3	Compliance risks including fair lending practices, mis-selling, repossession/foreclosure practices, consumer data protection (data security)	Operating Environment; Company Profile; Management & Strategy; Risk Appetite
Labor Relations & Practices	2	Impact of labor negotiations, including board/employee compensation and composition	Company Profile; Management & Strategy
Employee Wellbeing	1	n.a.	n.a.
Exposure to Social Impacts	2	Shift in social or consumer preferences as a result of an institution's social positions, or social and/or political disapproval of core banking practices	Company Profile; Financial Profile

Governance (G)

General Issues	G Score	Sector-Specific Issues	Reference
Management Strategy	3	Operational implementation of strategy	Management & Strategy
Governance Structure	3	Board independence and effectiveness; ownership concentration; protection of creditor/stakeholder rights; legal /compliance risks; business continuity; key person risk; related party transactions	Management & Strategy; Earnings & Profitability; Capitalisation & Leverage
Group Structure	3	Organizational structure; appropriateness relative to business model; opacity; intra-group dynamics; ownership	Company Profile
Financial Transparency	3	Quality and frequency of financial reporting and auditing processes	Management & Strategy





G Scale

5

4

3

2

Banks **Ratings Navigator**

Overall ESG Scale

curity) but this has very	key driver	0	issues	5	
	driver	0	issues	4	
	potential driver	5	issues	3	
	not a rating driver	4	issues	2	
	not a rating driver	5	issues	1	

How to Read This Page

ESG scores range from 1 to 5 based on a 15-level color gradation. Red (5) is most relevant and green (1) is least relevant.

The Environmental (E), Social (S) and Governance (G) tables break out the individual components of the scale. The left-hand box shows the aggregate E, S, or G score. General Issues are relevant across all markets with Sector-Specific Issues unique to a particular industry group. Scores are assigned to each sector-specific issue. These scores signify the credit-relevance of the sector-specific issues to the issuing entity's overall credit rating. The Reference box highlights the factor(s) within which the corresponding ESG issues are captured in Fitch's credit analysis.

The Credit-Relevant ESG Derivation table shows the overall ESG score. This score signifies the credit relevance of combined E, S and G issues to the entity's credit rating. The three columns to the left of the overall ESG score summarize the issuing entity's sub-component ESG scores. The box on the far left identifies the [number of] general ESG issues that are drivers or potential drivers of the issuing entity's credit rating (corresponding with scores of 3, 4 or 5) and provides a brief explanation for the score.

Classification of ESG issues has been developed from Fitch's sector and subsector ratings criteria and the General Issues and the Sector-Specific Issues have been informed with SASB's Materiality Map.

Sector references in the scale definitions below refer to Sector as displayed in the Sector Details box on page 1 of the navigator.

CREDIT-RELEVANT ESG SCALE				
Но	ow relevant are E, S and G issues to the overall credit rating?			
5	Highly relevant, a key rating driver that has a significant impact on the rating on an individual basis. Equivalent to "higher" relative importance within Navigator.			
4	Relevant to rating, not a key rating driver but has an impact on the rating in combination with other factors. Equivalent to "moderate" relative importance within Navigator.			
3	Minimally relevant to rating, either very low impact or actively managed in a way that results in no impact on the entity rating. Equivalent to "lower" relative importance within Navigator.			
2	Irrelevant to the entity rating but relevant to the sector.			
1	Irrelevant to the entity rating and irrelevant to the sector.			

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