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Research Update:

Finnish Municipality Finance And Municipal Guarantee Board Ratings Affirmed At 'AA+/A-1+'; Outlook Stable

December 12, 2024

Overview

- Our ratings on Municipality Finance and Municipal Guarantee Board, which comprise the funding system for Finnish local and regional governments (LRGs), are supported by a robust risk-adjusted capital position, strong liquidity position, and very competent management.
- Moreover, their credit quality is supported by a joint and pro rata guarantee commitment from the Municipal Guarantee Board.
- The ratings on both entities are capped by our ratings on the Republic of Finland (AA+/Stable/A-1+).
- We affirmed our 'AA+/A-1+' long- and short-term issuer credit ratings on Municipality Finance and Municipal Guarantee Board. The outlook is stable.

Rating Action

On Dec. 12, 2024, S&P Global Ratings affirmed its 'AA+' long-term and 'A-1+' short-term issuer credit ratings on Finnish local government funding agencies Municipality Finance PLC (MuniFin) and Municipal Guarantee Board (MGB). The outlook on the ratings is stable.

Outlook

The stable outlook reflects our expectation that the credit quality of Finnish LRGs and social housing providers will remain high while MuniFin will maintain robust capital and funding and liquidity positions.

Downside scenario

We could lower the ratings if the credit quality of the municipal sector deteriorates, MuniFin loses

PRIMARY CREDIT ANALYST

Linus Bladlund

Stockholm + 46-8-440-5356 linus.bladlund @spglobal.com

SECONDARY CONTACT

Abril A Canizares London + 44 20 7176 0161 abril.canizares @spglobal.com its business position as a predominant lender to the sector, and MuniFin's liquidity position weakens materially.

Upside scenario

We could raise the ratings if we take a similar rating action on the sovereign, provided that the group credit profile remains very strong.

Rationale

MuniFin and MGB comprise the funding system for Finnish LRGs. Given the institutionalized links and close integration between the two, we consider them a de facto group. MuniFin's lending and funding activities dominate the group's operations, so our assessment of the group credit profile is primarily based on MuniFin's credit features.

We consider MuniFin core to the group because it carries out all lending and funding activities, and plays an important role in providing financing to Finland's municipalities, wellbeing services counties, and non-profit housing organizations, the latter of which benefit from guarantees extended by Finland's central government. MuniFin has close links with the LRG sector, as well as the central government, illustrated by its lending mandate and the statutes that govern it. We also consider MGB core to the group, and a crucial component of Finland's joint LRG and social housing funding system. The LRG sector guarantees MuniFin's total financial liabilities through MGB.

We cap our ratings on MuniFin and MGB at 'AA+', the sovereign rating level, which is one notch below the group's anchor, due to tight direct and indirect links between the group and the sovereign. Firstly, the State of Finland holds a 16% share of MuniFin. Secondly, the sectors to which MuniFin lends rely on state transfers as part of its funding (municipalities and wellbeing services counties) and central government deficiency guarantees (state-subsidized housing).

Sector risk profile: Low-risk lending activities are at the heart of MuniFin's public policy mandate

We consider MuniFin's asset quality to be very high. Following the implementation of Social and Healthcare reform in 2023, MuniFin's lending activities can be divided into three categories: municipalities (including municipal companies when covered by a guarantee); wellbeing services counties; and non-profit housing organizations. The exposure to the newly created counties sits at about 8% and is therefore comparatively minor compared to the other two. Consequently, we don't explicitly account for this exposure when deriving the sector risk profile. Furthermore, because the counties are not members of the MGB at this stage and therefore remain outside the guarantee system, the MGB has imposed an annual cap on MuniFin's long-term financing, which includes financial leasing, to these entities, amounting to €400 million. As long as this cap remains in place, we don't expect the lending share to the counties will change notably.

We expect the financial position of Finnish municipalities will remain strong going forward. The institutional framework for municipalities rests on:

- A constitutionalized tax-raising autonomy and strong revenue flexibility in an international comparison;
- A comprehensive equalization system that aims to address differences in socioeconomic and financial conditions across the country;

- Formal and comprehensive central government monitoring with defined procedures for handling municipalities facing difficult financial positions; and
- High standards in terms of transparency and reporting practices combined with comprehensive forecasting procedures. For more information, see "Institutional Framework Assessment: Finnish Municipalities Have Flexibility To Balance Their Budgets" published Dec. 9, 2024, on RatingsDirect.

For state-subsidized housing, the financial conditions have been constrained by higher construction costs and interest expenses. However, the housing companies have managed to cover a meaningful share of the higher operating expenditure through increased rents. In a broader context, the financial position of the state-subsidized housing sector remains robust. About 49% of MuniFin's loans are directed to the housing sector, carrying central government deficiency guarantees, which we reflect in our sector risk profile. In June 2024, a parliamentary decision was passed to dissolve The Housing Finance and Development Centre of Finland (ARA), which administers the guarantees. ARA's operations will be transferred to the Ministry of the Environment in 2025, and can be viewed as a structural change rather than a discontinuation of the guarantee structure. Consequently, this has no effect on our sector risk profile.

Individual credit profile: A competent and experienced management, a robust market position, and strong financials support the group's credit quality

MuniFin's market position has gradually strengthened in recent years, and we estimate that its market share in new lending will be in the region of 80% for 2024. The presence of commercial banks and other financial entities is limited and they are mostly active in the municipal and county sectors. MuniFin has also sharpened its focus on sustainable loan products, which are increasingly in demand in the sector. In June 2024, green and social loans accounted for about 24% of the total long-term customer financing.

We view MuniFin's overall financial management, and by extension, that of the group, as very strong. European Central Bank (ECB) supervision and bank regulation play an important role in forming the internal risk management policies, and MuniFin is proactive in managing its regulatory requirements. In our view, MuniFin has robust frameworks for assessing the credit quality of its lending counterparties and managing other risks.

Overall, we believe MuniFin has a very robust capital position that is stronger than that of its Nordic peers, with a risk-adjusted capital (RAC) ratio at a high 94% as of June 2024. When factoring in our adjustment for single-name concentration in underlying borrowers, the RAC ratio remains extremely strong at 53%. MuniFin also has a robust common equity Tier 1 capital ratio of 102.4% as of June 2024. This is largely due to the zero-risk weight applied to MuniFin's customer exposures.

MuniFin benefits from strong name recognition in the international capital markets, allowing for a deep investor base. The agency has established debt programs and is a regular benchmark issuer, with a well-diversified funding profile in terms of markets, currencies, regions, maturities, and investor types. Since 2016, MuniFin has also issued green bonds, which has further expanded its investor base. In 2020, MuniFin also ventured into the themed bond space and issued its inaugural social bond, becoming the first Nordic entity in the sovereigns, supranationals, and agencies category to do so. We expect green and social bonds will play an increasingly important role in MuniFin's funding strategy.

We view MuniFin's management of its structured funding portfolio as prudent and note that the

agency accepts no market risk. Derivative contracts include stipulations for a two-way credit support extension, and the agency prudently accounts for collateral flows in its regular funding activities. However, the importance of structured funding has gradually decreased in recent years; in 2023, only about 7% of new funding can be considered structured, due to the possibility of early redemption. This decline can partly be attributed to MuniFin's decision to leave the Japanese Uridashi market for structured products. In our view, the diminishing share of structured funding is positive because it allows the agency to focus more on its core markets, while reducing the exposure to exotic asset derivative products and potential reputational risks.

We view the funding conditions as neutral for the credit rating. That said, MuniFin's one-year assets-to-liabilities ratio has weakened somewhat over the past year and sits below 1.0x, based on data in June 2024. However, we believe this drop is temporary due to widening bond spreads affecting the asset and liability management, and the timing of large benchmark redemptions inflating the denominator in the ratio.

We view the group's liquidity position as strong. Although MuniFin is exposed to risks through its dependence on wholesale market funding, this is mitigated by prudent liquidity policies, significant levels of high-quality pre-funding, and access to financing from the Finnish central bank, which is a part of the Eurosystem. We continue to assess MuniFin's status as a central bank counterparty and its access to liquidity from the central banking system as a distinguishing strength. In addition to a large part of its municipal loan book, the vast majority of its securities portfolio is eligible as collateral with the central bank.

MuniFin conducts active asset and liability management, but the size of its balance sheet and strategies to optimize its financial position result in occasional volatility of its liquid assets. MuniFin has taken steps to structurally improve its liquidity position, partly by extending the survival horizon. Our liquidity sources-to-uses ratio indicates that MuniFin will be able to meet its financial obligations over a one-year period, factoring in stressed market conditions.

Support via a joint and pro rata guarantee mechanism via MGB

The group benefits from a joint and pro rata guarantee commitment from the municipal sector through MGB. The guarantee system rests on an extensive and permanent membership base, and the members are bound by a joint pro rata liability mechanism. MGB was set up by law, which ensures its long-term existence, and its sole purpose is to guarantee funding to the municipal sector and affiliates. We assess the guarantees as predictable and immediately enforceable by law. We note that, unlike a joint and several guarantee commitment, there could be a delay in determining the required pro rata amounts across the member local governments if the MGB guarantee were triggered. Although it is yet to be tested, we believe the process could take up to one month. Even so, if the guarantee were called, we anticipate that MGB would remain proactive and secure timely payment through the flexibility that exists within the MGB Act. Under the MGB Act (section 1), MGB can grant guarantees for the funding of credit institutions directly or indirectly owned or controlled by municipalities. Between 1997 and 2001, there were two credit institutions within the meaning of the law: Municipality Finance PLC and Municipal Housing Finance PLC. Since 2001, MuniFin has been the only credit institution that meets the criteria set out in the MGB Act.

Key Indicators

Table 1

Municipality Finance PLC--Selected indicators

(Mil. €)	2024 H1	2023 H1	2022 H1	2021 H1	2020 H1
Business position					
Total adjusted assets	50,954	48,377	47,491	45,658	41,288
Customer loans (gross)	33,302	30,130	28,831	28,582	26,743
Growth in loans (%)	10.5	4.5	0.87	6.88	12.7
Net interest revenues	129	124	122	138	123
Non interest expenses	38	41	40	31	29
Capital and risk position					
Total liabilities	49,147	46,753	46,010	43,865	39,678
Total adjusted capital	1,928	1,676	1,532	1,427	1,235
Assets/capital	29	30	31	32	33
RAC before diversification (%)	94.0	75.2	68.9	69.1	54.7
RAC after diversification (%)	52.6	37.4	37.8	36.3	31.4
Gross nonperforming assets/gross loans	0.1	0.1	0.1	0.1	0.1
Funding and liquidity (x)					
Liquidity ratio with loan disbursement (1 year)	1.0	1.1	1.3	1.3	1.0
Liquidity ratio without loan disbursement (1 year)	1.1	1.2	1.3	1.3	1.2
Funding ratio (1 year)	0.9	1.0	1.1	1.1	1.0

H1--First half of the year. RAC--Risk-adjusted capital. N.A.--Not available. Source: S&P Global Ratings.

Ratings Score Snapshot

Sector risk profile	Very Strong
Individual credit profile:	
Business position	Strong
Management & governance	Very Strong
Capital adequacy	Very Strong
Funding & liquidity	Strong
Anchor	aaa
Overriding factors and caps	0
Holistic analysis	0
Group credit profile	aa+
Extraordinary support	0
Municipality Finance	
Group status	Core
lssuer credit rating	AA+/Stable/A-1+

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Municipal Guarantee Board	
Group status	Core
Issuer credit rating	AA+/Stable/A-1+

Related Criteria

- Criteria | Governments | International Public Finance: Methodology For Rating Non-U.S. Public-Sector Funding Agencies, July 26, 2024
- Criteria | Financial Institutions | General: Risk-Adjusted Capital Framework Methodology, April 30, 2024
- General Criteria: Environmental, Social, And Governance Principles In Credit Ratings, Oct. 10, 2021
- General Criteria: Group Rating Methodology, July 1, 2019
- General Criteria: Methodology For Linking Long-Term And Short-Term Ratings, April 7, 2017
- General Criteria: Ratings Above The Sovereign--Corporate And Government Ratings: Methodology And Assumptions, Nov. 19, 2013
- General Criteria: Principles Of Credit Ratings, Feb. 16, 2011

Related Research

- Institutional Framework Assessment: Finnish Municipalities Have Flexibility To Balance Their Budgets, Dec. 9, 2024
- Finland 'AA+/A-1+' Ratings Affirmed; Outlook Stable, Oct. 25, 2024

Ratings List

Ratings Affirmed — Municipality Finance PLC						
						Municipal Guarantee Board
Issuer Credit Rating	AA+/Stable/A-1					
Municipality Finance PLC						
Senior Unsecured	AA+					
Commercial Paper	A-1+					

Certain terms used in this report, particularly certain adjectives used to express our view on rating relevant factors, have specific meanings ascribed to them in our criteria, and should therefore be read in conjunction with such criteria. Please see Ratings Criteria at www.spglobal.com/ratings for further information. A description of each of S&P Global Ratings' rating categories is contained in "S&P Global Ratings Definitions" at https://disclosure.spglobal.com/ratings/en/regulatory/article/-/view/sourceld/504352. Complete ratings information is available to RatingsDirect subscribers at www.capitaliq.com. All ratings affected by this rating action can be found on S&P Global Ratings' public website at www.spglobal.com/ratings. Alternatively, call S&P Global

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