

Research Update:

Netherlands-Based De Volksbank Outlook Revised To Negative After Second Administrative Fine Procedure; Ratings Affirmed

August 14, 2024

Overview

- On Aug. 8, 2024, De Volksbank N.V. (DVB) announced as part of its first-half results that the Dutch Central Bank (DNB) had initiated an administrative fine procedure on shortcomings in DVB's risk management from previous years.
- This follows the ongoing administrative fine procedure related to the DNB's 2023 criticisms of DVB's anti-money-laundering controls.
- We revised our outlook on DVB to negative from stable and affirmed our 'A/A-1' long-term and short-term ratings on the bank.
- The negative outlook reflects our view that the bank's governance and risk management practices could be lagging regulatory and peers' standards, and associated costs could hinder the bank hitting financial targets and undermine its competitiveness.

Rating Action

On Aug. 14, 2024, S&P Global Ratings revised its outlook on Netherlands-based De Volksbank N.V. (DVB) to negative from stable and affirmed its 'A/A-1' long-term and short-term issuer credit ratings on DVB and related issue credit ratings on the bank.

Rationale

In our view, a second administrative fine procedure in 12 months casts doubt about the wider effectiveness of DVB's risk management. The procedures relate to different topics--operational management and the inadequate identification of risks related to money laundering, the financing of terrorism, and customer integrity (for more information, see "Remedying Anti-Money-Laundering Controls May Dilute De Volksbank's Improved Earnings," published Aug. 14, 2023, on RatingsDirect). While DVB has not fully explained the shortcomings that led to this

PRIMARY CREDIT ANALYST

Anastasia Turdyeva

Dublin + (353)1 568 0622 anastasia.turdyeva @spglobal.com

SECONDARY CONTACT

Letizia Conversano Paris + 353 (0)1 568 0615 letizia.conversano @spglobal.com second procedure, taken together, we consider these events a sign that the bank's governance and risk management practices might lag regulatory and peers' standards. We are also mindful of management turnover in recent months, including a change in chief risk officer (see "Netherlands-Based De Volksbank Affirmed At 'A/A-1' On Planned Management Replacements; Outlook Stable, published Dec. 14, 2023.)

DVB will likely need to pay fines and undertake significant changes. While any fines have not been set, we anticipate they will not heavily impair the bank's annual earnings by themselves. Nevertheless, we are mindful that control gaps require associated remediation plans, which consume financial and management resources. This also comes at a time when the reshaped management team had hoped to focus squarely on the timely execution of DVB's strategic plan. This plan aims, among other things, to increase and diversify revenue, optimize liquidity buffers, expand and diversify lending toward Dutch consumers and small and midsize enterprises, and improve cost efficiency.

We see the strategic plan's timely and substantive execution as important for the bank to preserve its position in the Dutch market and address longstanding structural profitability issues. DVB's profitability has soared since 2021 thanks to higher policy rates that led its net interest margin (NIM) to spike. However, it now faces a tougher environment of low economic and credit growth, high competition for new lending, gradually falling interest rates, and squeezed deposit margins. For the first six months of 2024, DVB's net interest income decreased 15% compared with the same period in 2023, mostly due to NIM compression. Accounting for revenue pressure and cost pressures from higher wages and digital investments, management targets a 57%-59% cost-to-income ratio by end-2025 and return of equity of 8%-10%. Although the full amount of recurring and one-off costs is unknown, they could push DVB's cost-to-income ratio above 60% in 2024-2026, delaying the achievement of its cost target, already relatively higher than peers'; and further widening the gap with key competitors, whose cost-to-income ratio trends well below 60%.

DVB continues to benefit from a very strong capital base, a solid funding profile, and ample liquidity buffers. We expect that the bank's capital base will remain a relative credit strength--notably, we anticipate that its risk-adjusted capital ratio will remain comfortably above 15% through 2026, and management has said that it will maintain a regulatory common equity Tier 1 ratio above 17%. For now, we think the second administrative fine procedure will not materially impair DVB's reputation or franchise, given its longstanding presence in the market and loyal clientele. Therefore, we expect the bank will continue relying on a broadly stable deposit base, constituting above 80% of its funding base; and preserve its broad liquidity buffers, comfortably covering its short-term wholesale funding (it was 10x as of December 2023).

Outlook

The negative outlook reflects our view that DVB's governance and risk management practices could be lagging regulatory and peers' standards. The outlook also reflects our view that the additional costs resulting from the two administrative procedures will likely raise costs, possibly hindering the bank's achievement of its already relatively high 57%-59% cost-to-income target, and therefore its competitiveness.

Downside scenario

We could lower our ratings on DVB within the next 18-24 months if the bank fails to remedy identified risk management gaps or further risk-management related shortcomings emerge. We could also consider a downgrade if these or other circumstances were to impede the execution of its strategy, impairing DVB's profitability and competitiveness.

Upside scenario

We could revise the outlook to stable in that time if the bank substantially delivers on its remediation plans, and addresses its structural profitability.

Ratings Score Snapshot

	То	From
Issuer Credit Rating	A/Negative/A-1	A/Stable/A-1
SACP	bbb+	bbb+
Anchor	bbb+	bbb+
Business position	Moderate (-1)	Moderate (-1)
Capital and earnings	Very strong (+2)	Very strong (+2)
Risk position	Moderate (-1)	Moderate (-1)
Funding and liquidity	Adequate and Adequate (0)	Adequate and Adequate (0)
Comparable ratings analysis	0	0
Support	+2	+2
ALAC support	+2	+2
GRE support	0	0
Group support	0	0
Sovereign support	0	0
Additional factors	0	0

SACP--Stand-alone credit profile.

Environmental, social, and governance (ESG) credit factors for this change in credit rating/outlook and/or CreditWatch status:

- Risk management, culture, and oversight

Related Criteria

- Criteria | Financial Institutions | General: Risk-Adjusted Capital Framework Methodology, April 30, 2024
- General Criteria: Hybrid Capital: Methodology And Assumptions, March 2, 2022

- Criteria | Financial Institutions | Banks: Banking Industry Country Risk Assessment Methodology And Assumptions, Dec. 9, 2021
- Criteria | Financial Institutions | General: Financial Institutions Rating Methodology, Dec. 9, 2021
- 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: Principles Of Credit Ratings, Feb. 16, 2011

Related Research

- De Volksbank N.V., Aug. 7, 2024
- Benelux Banks Outlook 2024: Profitability Hinges On Operating Efficiency, Feb. 22, 2024
- Dutch Banks' Net Interest Income Has Likely Peaked, Feb. 14, 2024
- Remedying Anti-Money-Laundering Controls May Dilute De Volksbank's Improved Earnings, Dec. 14, 2023
- Netherlands-Based De Volksbank Affirmed At 'A/A-1' On Planned Management Replacements; Outlook Stable, Aug. 14, 2023

Ratings List

Ratings Affirmed		
De Volksbank N.V.		
Resolution Counterparty Ratin	g A+//A-1	
Senior Unsecured	A/A-1	
Ratings Affirmed; Outlook Action		
	То	From
De Volksbank N.V.		
Issuer Credit Rating	A/Negative/A-1	A/Stable/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

Ratings' Global Client Support line (44) 20-7176-7176.

Copyright © 2024 by Standard & Poor's Financial Services LLC. All rights reserved.

No content (including ratings, credit-related analyses and data, valuations, model, software or other application or output therefrom) or any part thereof (Content) may be modified, reverse engineered, reproduced or distributed in any form by any means, or stored in a database or retrieval system, without the prior written permission of Standard & Poor's Financial Services LLC or its affiliates (collectively, S&P). The Content shall not be used for any unlawful or unauthorized purposes. S&P and any third-party providers, as well as their directors, officers, shareholders, employees or agents (collectively S&P Parties) do not guarantee the accuracy, completeness, timeliness or availability of the Content. S&P Parties are not responsible for any errors or omissions (negligent or otherwise), regardless of the cause, for the results obtained from the use of the Content, or for the security or maintenance of any data input by the user. The Content is provided on an "as is" basis. S&P PARTIES DISCLAIM ANY AND ALL EXPRESS OR IMPLIED WARRANTIES, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE, FREEDOM FROM BUGS, SOFTWARE ERRORS OR DEFECTS, THAT THE CONTENT'S FUNCTIONING WILL BE UNINTERRUPTED OR THAT THE CONTENT WILL OPERATE WITH ANY SOFTWARE CONFIGURATION. In no event shall S&P Parties be liable to any party for any direct, incidental, exemplary, compensatory, punitive, special or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs or losses caused by negligence) in connection with any use of the Content even if advised of the possibility of such damages.

Credit-related and other analyses, including ratings, and statements in the Content are statements of opinion as of the date they are expressed and not statements of fact. S&P's opinions, analyses and rating acknowledgment decisions (described below) are not recommendations to purchase, hold, or sell any securities or to make any investment decisions, and do not address the suitability of any security. S&P assumes no obligation to update the Content following publication in any form or format. The Content should not be relied on and is not a substitute for the skill, judgment and experience of the user, its management, employees, advisors and/or clients when making investment and other business decisions. S&P does not act as a fiduciary or an investment advisor except where registered as such. While S&P has obtained information from sources it believes to be reliable, S&P does not perform an audit and undertakes no duty of due diligence or independent verification of any information it receives. Rating-related publications may be published for a variety of reasons that are not necessarily dependent on action by rating committees, including, but not limited to, the publication of a periodic update on a credit rating and related analyses.

To the extent that regulatory authorities allow a rating agency to acknowledge in one jurisdiction a rating issued in another jurisdiction for certain regulatory purposes, S&P reserves the right to assign, withdraw or suspend such acknowledgment at any time and in its sole discretion. S&P Parties disclaim any duty whatsoever arising out of the assignment, withdrawal or suspension of an acknowledgment as well as any liability for any damage alleged to have been suffered on account thereof.

S&P keeps certain activities of its business units separate from each other in order to preserve the independence and objectivity of their respective activities. As a result, certain business units of S&P may have information that is not available to other S&P business units. S&P has established policies and procedures to maintain the confidentiality of certain non-public information received in connection with each analytical process.

S&P may receive compensation for its ratings and certain analyses, normally from issuers or underwriters of securities or from obligors. S&P reserves the right to disseminate its opinions and analyses. S&P's public ratings and analyses are made available on its Web sites, www.spglobal.com/ratings (free of charge), and www.ratingsdirect.com (subscription), and may be distributed through other means, including via S&P publications and third-party redistributors. Additional information about our ratings fees is available at www.spglobal.com/usratingsfees.

STANDARD & POOR'S, S&P and RATINGSDIRECT are registered trademarks of Standard & Poor's Financial Services LLC.