Various Positive Rating Actions Taken On Irish Banks On Improving Funding Profile

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- We believe the credit profile of the Irish banking system has further improved during 2018 because it has demonstrated better wholesale funding access and a more proactive approach to the sell-down of problematic loan portfolios.
- We also observe net interest margin resilience and expect loan growth to pick up, which could benefit earnings stability as provision releases come to an end.
- We have therefore revised upward our industry risk assessment for Ireland's banking industry.
- Consequently, we are raising our long-term issuer credit ratings on AIB Group PLC, KBC Bank Ireland PLC, and Permanent TSB Group Holdings PLC. The outlook in each case is stable.
- We are affirming the ratings on Bank of Ireland Group PLC and Ulster Bank Ireland DAC. The outlook on both ratings remains positive.
- We expect future rating actions on Irish banks to be bank-specific as we don't anticipate any further material improvement in our overall view of the banking system, notwithstanding our expectation that the scale of nonperforming assets will continue to reduce in importance.

LONDON (S&P Global Ratings) Dec. 17, 2018--S&P Global Ratings said today that it took various rating actions on Irish banks. Specifically, we:

- Raised the long- and short-term ratings on non-operating holding company (NOHC), AIB Group PLC, to 'BBB-/A-3' from 'BB+/B'. At the same time, we raised the long-term rating on its main operating bank, Allied Irish

Banks PLC, to 'BBB+' from 'BBB' and affirmed the 'A-2' short-term rating. Furthermore, we raised the ratings on its U.K. subsidiary, AIB Group (UK) PLC, to 'BBB/A-2' from 'BBB-/A-3'. The outlook is stable.

- Raised the ratings on KBC Bank Ireland PLC to 'BBB/A-2' from 'BBB-/A-3'. The outlook is stable.
- Raised the long-term rating on NOHC, Permanent TSB Group Holdings PLC, to 'BB-' from 'B+' and affirmed the short-term 'B' rating. At the same time, we raised the long-term rating on its main operating bank, Permanent TSB PLC, to 'BB+' from 'BB' and affirmed the short-term 'B' rating. The outlook is stable.
- Affirmed the ratings on NOHC, Bank of Ireland Group PLC (BOIG) at 'BBB-/A-3'. In addition, we affirmed the ratings on its main operating bank, Bank of Ireland, at 'BBB+/A-2'. The outlook on both entities remains positive.
- Affirmed the 'BBB+/A-2' ratings on Ulster Bank Ireland DAC. The outlook remains positive.

RATIONALE

Our improved view of the Irish banking system principally reflects its improved funding profile. During 2018, we have observed better access to wholesale funding, which builds upon its inherent deposit-led funding profile. Moreover, the more proactive approach to the sell-down of problematic loan portfolios leads us to believe that funding access won't falter. Notwithstanding this updated view, we are not overly optimistic on the future prospects for the Irish banking system. We note the potential for economic imbalances if the brisk rate of house price inflation persists, especially if it becomes credit-fuelled. We are also mindful of the potential risks to Ireland from its close trading partner, the U.K., leaving the EU.

Our improved view of Ireland's systemwide funding profile reflects our expectation that our measure of systemwide core deposits (including 100% of retail deposits and 50% of corporate deposits) will cover around 80% of systemwide domestic loans at end-2018. This metric now compares well with peers. We note the dramatic improvement in this metric from 41% at end-2011, primarily relating to the major reduction in loan balances by banks and the recovery from a low base in the confidence in Irish banks by corporate depositors. We now expect Irish loan books to expand in 2019 and assume that deposit growth will broadly keep pace. As a result, we expect this metric will consistently remain above our 75% threshold for our current funding assessment.

Allayed to the stable and granular deposit funding profile, we have observed regular access to wholesale funding markets. In particular, the two largest banks have issued NOHC senior unsecured instruments as part of their progress to build their minimum requirement for own funds and eligible liabilities (MREL). Indicative of the progress made, during 2018, we have incorporated one notch for additional loss-absorbing capacity (ALAC) into the long-term ratings on the main operating banks of AIB Group PLC and Bank of Ireland Group PLC. Given that all Irish banks have reduced their regulatory nonperforming exposures (NPEs), we assume that this will encourage investors to maintain wholesale funding access for Irish banks in general.

The stock of NPEs remains large, but is gradually reducing in importance and visibility in our analysis. Based upon announced NPE portfolio sales year-to-date, we assume that the systemwide NPE ratio will be around 9%-10% by end-2018, down from around 14% reported at end-2017. We think this estimate will give Ireland a lower NPE ratio than Italy and Portugal, but higher than Spain, among peer eurozone markets that have been struggling with NPEs. This measure is important in that the European Central Bank is strongly encouraging Irish banks to reduce their NPE ratios toward the eurozone norm of around 5% by end-2019.

Provision releases continue to support Irish bank earnings. Over the four years to 2017, combined domestic lending provision releases have totaled over €3 billion for the five main banks, or about 45 basis points of average domestic loans per year. This trend has broadly continued into 2018, though we think the scope for further provision releases has likely ended. On a pre-provision basis, earnings have been supported by relatively robust net interest margins. Funding costs have reduced but, in addition, asset spreads on new mortgage lending and other lending is higher than the eurozone average. In the long term, we don't see this pricing differential as sustainable, but in the meantime there is no demonstrable evidence of increased competition either from within the industry or from new entrants. In 2019, we expect banks to switch their risk appetite to loan growth mode while continuing to make efforts to improve their operational efficiency and digital capability.

Ireland's housing market, which gathered pace in 2017, has remained robust in 2018. Encouragingly, the rate of annual house price growth has cooled from a double-digit rate of growth to a current reported figure of 8.4%. We think this is partly due to the impact of regulatory macro-prudential rules. Even so, our calculation of the four-year average change in prices through 2018 is over 8%, or higher still if we base this on a more forward looking four-year average through to 2020; we assume nominal growth of 8% in 2019 and 7% in 2020. On this measure, Ireland ranks meaningfully higher than most similar ranked countries. This potential economic imbalance could be a concern if it becomes credit-fuelled, which is possible given the stated aim of several of the banks to target loan growth. We understand that they need to boost net interest income in order to achieve their return targets following their diminished balance sheet size.

In light of the above, we have revised our industry risk score for the Irish banking sector to '4' from '5' (on a scale of 1-10, with 1 being the lowest risk). This score has gradually improved from '7' when we first applied our Banking Industry Country Risk Assessment (BICRA) criteria in November 2011 (and that score already factored in some expectation of improvement after Ireland's 2008-2011 banking crisis. At that time, the economic risk score assigned was also '7').

As such, we now classify Ireland as being in group 4, rather than group 5, under our BICRA assessment. Our economic risk assessment remains unchanged at '5'. As a result, we have revised upward our anchor, the starting point for assigning an issuer credit rating, for banks operating primarily in Ireland to 'bbb' from 'bbb-'. In the context of the EU-27, 12 EU markets currently have an anchor of either 'a-', 'bbb+', or 'bbb'. Thus, we now rank Ireland's banking system roughly in the middle of the EU market.

We are unlikely to revise upward the anchor any further, even if NPEs continue to reduce, as we assume. We note that there has been no alteration in government ownership stakes of a large part of the banking system over the past 18 months. We assume that these long-standing stakes will only be reduced to zero during the 2020s, which indicates the difficulties that banks may face to substantially increase returns once provision releases recede.

We have incorporated these revised assumptions into our ratings on five rated Irish banks, as explained further below. The ratings on Barclays Bank Ireland PLC (A/Stable/A-1), a core subsidiary of Barclays PLC under our group rating methodology, are unaffected by this review.

AIB GROUP PLC (AIB)

We have revised upward AIB's unsupported group credit profile (UGCP) to 'bbb' from 'bbb-' by reflecting the improved anchor in its ratings construct. The NOHC is rated one notch below the UGCP as we view the claims of the creditors of NOHCs to be structurally subordinated to those of operating company creditors. We rate Allied Irish Banks PLC one notch higher than the UGCP, reflecting ALAC support. Finally, we have raised the ratings on its U.K. subsidiary, AIB Group (UK) PLC, which we deem to be strategically important to the group, as we cap the ratings at one notch below Allied Irish Banks PLC.

The stable outlook reflects our expectation that AIB will continue to proactively reduce its NPEs and maintain its domestic market position over the two-year outlook horizon. We also assume that the forthcoming change in the senior leadership team will not lead to a material shift in strategy or risk appetite.

We could raise the ratings if AIB improves its returns from both its domestic and international operations, while maintaining its risk appetite. Less likely, we could also raise the ratings if AIB reduces NPEs to be in line with higher rated peers, while maintaining its current capital strength.

We are unlikely to lower the ratings at this time, but this could arise from a more aggressive capital policy than we assume, or a re-emergence of asset quality weaknesses.

Finally, we could also raise the ratings on Allied Irish Banks PLC if the group makes more substantial progress than expected in terms of MREL issuance. This would enable us to raise the ratings if its ALAC buffer exceeds our 8% threshold for two-notches of ALAC support within the long-term rating, and we expect this to remain the case. Greater clarity on the group's future capital policy may also inform this analysis.

BANK OF IRELAND GROUP PLC (BOIG)

BOIG's UGCP is unchanged at 'bbb', notwithstanding the improvement in its anchor. This is because we don't believe that its greater geographic diversity relative to Irish peers sufficiently adds to the improved Irish industry risk assessment. We rate the NOHC one notch below the UGCP. Bank of Ireland, the main operating bank, is rated one notch higher than the UGCP reflecting ALAC support.

The positive outlook on BOIG reflects its superior asset quality track record relative to domestic peers, which we believe gives it the potential to be aligned with higher rated international peers over our two-year outlook time horizon.

We could raise the ratings if asset quality metrics across the group significantly improve, while at the same time capitalization remains a ratings strength and internal capital generation improves.

We could revise the outlook back to stable if the group makes slower progress than we assume, or if a severe adverse economic scenario emerges in the U.K., possibly linked to a disorderly outcome to Brexit.

Finally, we could also raise the ratings on Bank of Ireland if the group makes more substantial progress than expected in terms of MREL issuance. This would enable us to raise the ratings if its ALAC buffer exceeds our 8% threshold for two-notches of ALAC support within the long-term rating, and we expect this to remain the case.

KBC BANK IRELAND PLC (KBCI)

We have raised the ratings by removing the one-notch negative adjustment, as we believe that KBCI is improving its financial profile. KBCI's stand-alone credit profile (SACP) is unchanged despite the upward revision of its anchor, as we believe that its transition into a full-service retail bank with a strong digital focus remains unproven.

The stable outlook over our two-year outlook horizon balances KBCI's improving financial profile with its yet-to-be proven ability to generate stronger and predictable statutory earnings, as it further implements its digital strategy.

We could raise the rating if we considered that KBCI had become more important to its parent, proving to be a stronger and more material contributor to group earnings, and if we saw the development of profitable bancassurance operations that were more reflective of KBC's Group overall business model. This could lead us to revise upward our group status assessment. We could also raise the ratings if KBCI's own stand-alone credit characteristics improve as a result of further significant reduction in NPEs.

We could lower the ratings if we observed difficulties in KBCI translating its digital banking efforts into earnings that could be acceptable to its parent.

PERMANENT TSB GROUP HOLDINGS PLC (PTSB)

We have revised upward PTSB's UGCP to 'bb+' from 'bb'. The NOHC is rated two notches below the UGCP because the group credit profile is non-investment grade. We rate the main operating bank, Permanent TSB PLC, at the same level as the UGCP as we do not incorporate any notches for ALAC support.

The stable outlook over our 12-month outlook horizon balances the notable reductions that we have observed in PTSB's NPE ratio, with its reduced scale and yet-to-be proven ability to demonstrate better pre-provision earnings.

We could raise the ratings if PTSB is able to demonstrate better conversion of its retail banking strengths into earnings generation. We note that an upward revision of the UGCP would likely lead us to raise the long-term issuer credit rating on the NOHC by two notches, as we only apply a one-notch differential for a NOHC rating from an investment-grade group credit profile.

We could lower the ratings if we see evidence that the recovery in PTSB's asset quality is reversing, or its business growth ambitions falter.

Finally, we could raise the ratings on the main operating bank, Permanent TSB PLC, if we observe material progress in MREL issuance, which is currently unproven. This could lead us to believe that our ALAC measure will be above our 5% threshold for one-notch of ALAC support. Greater clarity on the group's future capital policy may also inform this analysis.

ULSTER BANK IRELAND DAC (UBI)

We have revised upward UBI's SACP to 'bbb-' from 'bb+' by reflecting the improved anchor in its ratings construct. The ratings now incorporate two notches of group support from its ultimate parent, The Royal Bank of Scotland Group plc (RBSG), rather than the previous three. This is because we view UBI as a highly strategic subsidiary of RBSG, and we cap the ratings at one notch below core entities such as National Westminster Bank Plc.

The positive outlook on UBI mirrors that on RBSG. We could upgrade both RBSG and UBI within our 18-24 month outlook horizon if RBSG's credit risk profile further improves toward the average observed among U.K. peers. We could also consider an upgrade if we were to reclassify UBI as a core subsidiary of the group. This is not a likely scenario in the next two years but could happen if UBI's operating performance and credit risk metrics improve, converging toward those of the wider group.

We would revise our outlook on UBI to stable if we saw ratings pressure on RBSG, which could occur if it looks unlikely to maintain consistent statutory profitability. Downward pressure could also build if we observed UBI becoming less integral to RBSG's strategy, with the probability of extraordinary parental support weakening as a result. This could happen if, for example, UBI proves unable to complete the turnaround its business model and sustainably improve profitability.

BICRA SCORE SNAPSHOT*

Ireland

	To	From
BICRA Group	4	5
Economic risk	5	5
Economic resilience	Low risk	Low risk
Economic imbalances	High risk	Intermediate risk
Credit risk in the economy	High risk	Very high risk
Industry risk	4	5
Institutional framework	Intermediate risk	Intermediate risk
Competitive dynamics	Intermediate risk	Intermediate risk
Systemwide funding	Intermediate risk	High risk
Trends		
Economic risk trend	Stable	Stable
Industry risk trend	Stable	Positive

*Banking Industry Country Risk Assessment (BICRA) economic risk and industry risk scores are on a scale from 1 (lowest risk) to 10 (highest risk). For more details on our BICRA scores on banking industries across the globe, please see "Banking Industry Country Risk Assessment Update" published monthly on RatingsDirect.

RATINGS SCORE SNAPSHOTS

AIB Group PLC

	To	From
Issuer Credit Rating	BBB-/Stable/A-3	BB+/Positive/B
UGCP	bbb	bbb-
Anchor	bbb	bbb-
Business Position	Adequate (0)	Adequate (0)
Capital and Earnings	Strong (+1)	Strong (+1)
Risk Position	Moderate (-1)	Moderate (-1)
Funding and Liquidity	Average and Adequate (0)	Average and Adequate (0)
Support	(+1)	(+1)
ALAC Support	(+1)	(+1)
Additional Factors	(0)	(0)

Bank of Ireland Group PLC

	To	From

Issuer Credit Rating	BBB-/Positive/A-3	BBB-/Positive/A-3
UGCP	bbb	bbb
Anchor	bbb	bbb-
Business Position	Adequate (0)	Strong (+1)
Capital and Earnings	Strong (+1)	Strong (+1)
Risk Position	Moderate (-1)	Moderate (-1)
Funding and Liquidity	Average and Adequate (0)	Average and Adequate (0)
Support	(+1)	(+1)
ALAC Support	(+1)	(+1)
Additional Factors	(0)	(0)

KBC Bank Ireland PLC

	To	From
Issuer Credit Rating	BBB/Stable/A-2	BBB-/Positive/A-3
SACP	bb	bb
Anchor	bbb	bbb-
Business Position	Weak (-2)	Moderate (-1)
Capital and Earnings	Strong (+1)	Strong (+1)
Risk Position	Weak (-2)	Weak (-2)
Funding and Liquidity	Average and Adequate (0)	Average and Adequate (0)
Support	(+3)	(+3)
Group Support	(+3)	(+3)
Additional Factors	(0)	(-1)

Permanent TSB Group Holdings PLC

	To	From
Issuer Credit Rating	BB-/Stable/B	B+/Positive/B
UGCP	bb+	bb
Anchor	bbb	bbb-
Business Position	Weak (-2)	Moderate (-1)
Capital and Earnings	Strong (+1)	Strong (+1)
Risk Position	Moderate (-1)	Weak (-2)
Funding and Liquidity	Average and Adequate (0)	Average and Adequate (0)
Support	(0)	(0)
Group Support	(0)	(0)

Additional Factors	(0)	(0)

Ulster Bank Ireland DAC

	To	From
Issuer Credit Rating	BBB+/Positive/A-2	BBB+/Positive/A-2
SACP	bbb-	bb+
Anchor	bbb	bbb-
Business Position	Moderate (-1)	Moderate (-1)
Capital and Earnings	Very Strong (+2)	Very Strong (+2)
Risk Position	Weak (-2)	Weak (-2)
Funding and Liquidity	Average and Adequate (0)	Average and adequate (0)
Support	(+2)	(+3)
Group Support	(+2)	(+3)
Additional Factors	(0)	(0)

RELATED CRITERIA

- Criteria - Financial Institutions - General: Methodology For Assigning Financial Institution Resolution Counterparty Ratings, April 19, 2018
- Criteria - Financial Institutions - General: Risk-Adjusted Capital Framework Methodology, July 20, 2017
- General Criteria: Methodology For Linking Long-Term And Short-Term Ratings , April 7, 2017
- General Criteria: Guarantee Criteria, Oct. 21, 2016
- Criteria - Financial Institutions - Banks: Bank Rating Methodology And Assumptions: Additional Loss-Absorbing Capacity, April 27, 2015
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- General Criteria: Group Rating Methodology, Nov. 19, 2013
- General Criteria: Methodology: Use Of 'C' And 'D' Issue Credit Ratings For Hybrid Capital And Payment-In-Kind Instruments, Oct. 24, 2013
- Criteria - Financial Institutions - Banks: Quantitative Metrics For Rating Banks Globally: Methodology And Assumptions, July 17, 2013
- Criteria - Financial Institutions - Banks: Banking Industry Country Risk Assessment Methodology And Assumptions, Nov. 9, 2011
- Criteria - Financial Institutions - Banks: Banks: Rating Methodology And Assumptions, Nov. 9, 2011
- General Criteria: Use Of CreditWatch And Outlooks, Sept. 14, 2009
- Criteria - Financial Institutions - Banks: Commercial Paper I: Banks,

March 23, 2004

RELATED RESEARCH

- Banking Industry Country Risk Assessment: Ireland, Dec. 17, 2018
- Ireland 'A+/A-1' ratings Affirmed; Outlook Remains Stable, Nov. 30, 2018

Ratings List

Upgraded

	To	From
AIB Group PLC		
Issuer Credit Rating	BBB-/Stable/A-3	BB+/Positive/B
Allied Irish Banks PLC		
Issuer Credit Rating	BBB+/Stable/A-2	BBB/Positive/A-2
RCR	A-/--/A-2	BBB+/--/A-2
AIB Group (U.K.) PLC		
Issuer Credit Rating	BBB/Stable/A-2	BBB-/Positive/A-3
RCR	BBB+/--/A-2	BBB/--/A-2
KBC Bank Ireland PLC		
Issuer Credit Rating	BBB/Stable/A-2	BBB-/Positive/A-3
RCR	BBB+/--/A-2	BBB/--/A-2
Permanent TSB Group Holdings PLC		
Issuer Credit Rating	BB-/Stable/B	B+/Positive/B
Permanent TSB PLC		
Issuer Credit Rating	BB+/Stable/B	BB/Positive/B
RCR	BBB/--/A-2	BBB-/--/A-3

Ratings Affirmed

Bank of Ireland Group PLC	
Issuer Credit Rating	BBB-/Positive/A-3
Bank of Ireland	
Issuer Credit Rating	BBB+/Positive/A-2
RCR	A-/--/A-2
Ulster Bank Ireland DAC	
Issuer Credit Rating	BBB+/Positive/A-2
RCR	A-/--/A-2

RCR--Resolution counterparty rating.

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.standardandpoors.com for further information. Complete ratings information is available to subscribers of RatingsDirect at www.capitaliq.com. All ratings affected by this rating action can be found on S&P Global Ratings' public website at www.standardandpoors.com. Use the Ratings search box located in the left column. Alternatively, call one of the following S&P Global Ratings numbers: Client Support Europe (44) 20-7176-7176; London Press Office (44) 20-7176-3605; Paris (33) 1-4420-6708; Frankfurt (49) 69-33-999-225; Stockholm (46) 8-440-5914; or Moscow 7 (495) 783-4009.