



Notification template for Article 131 of the Capital Requirements Directive (CRD) – Other Systemically Important Institutions (O-SIIs)

Template for notifying the European Central Bank (ECB) and the European Systemic Risk Board (ESRB) of the setting or resetting of an O-SII buffer under Article 131(7) CRD and of the identity of O-SIIs under Article 131(12) CRD

Please send/upload this template to:

- <u>macropru.notifications@ecb.europa.eu</u> when notifying the ECB (under Article 5 of the Single Supervisory Mechanism (SSM) Regulation¹);
- <u>DARWIN/ASTRA</u> when notifying the ESRB.

The ESRB will forward this notification to the European Commission, to the European Banking Authority (EBA) and to the competent and designated authorities of the Member States concerned without delay and will publicly disclose the names of the O-SIIs on its website. This notification will be made public by the ESRB once the relevant authorities have adopted and published the notified macroprudential measure².

E-mailing/uploading this template to the above addresses constitutes official notification; no further official letter is required. To facilitate the work of the notified authorities, please send the notification template in a format that allows the information to be read electronically.

1. Notifying national authority							
1.1 Name of the notifying authority	National Bank of Belgium (NBB)						
1.2 Country of the notifying authority	Belgium						
2. Description of the me	2. Description of the measure						
	Name of institution	LEI	Consolidation level				
	1. KBC Group KBC Bank NV	213800X3Q9LSAKRUWY91 6B2PBRV1FCJDMR45RZ53	Consolidated Sub-consolidated + Individual				
2.1a Institution or group of	2. BNP Paribas Fortis SA/NV	KGCEPHLVVKVRZYO1T647	Consolidated + Individual				
institutions concerned	3. Euroclear Holding	549300IQZVZ949N37S44	Euroclear Bank consolidated to the level of Euroclear Holding				
	Euroclear SA	549300CBNW05DILT6870	Sub-consolidated				
	Euroclear Bank SA/NV	549300OZ46BRLZ8Y6F65	Sub-consolidated + Individual				
	4. ING Belgium NV	JLS56RAMYQZECFUF2G44	Consolidated + Individual				
	5. Belfius Bank SA/NV	A5GWLFH3KM7YV2SFQL84	Consolidated + Individual				
	6. The Bank of New York Mellon	MMYX0N4ZEZ13Z4XCG897	Consolidated + Individual				

¹ Council Regulation (EU) No 1024/2013 of 15 October 2013 conferring specific tasks on the European Central Bank concerning policies relating to the prudential supervision of credit institutions (OJ L 287, 29.10.2013, p. 63). ² On request by the notifying authority, it may be agreed with the Head of the ESRB Secretariat that this notification, or a part thereof, should not be published for reasons of confidentiality or financial stability.

[7. Investeringsmaatschappij	549	3008QOCP58OLEN998	Ar	genta Spaarbank consolidated	
	Argenta	040		to	the level of Investerings- aatschappij Argenta	
	Argenta Bank- en Verzekeringsgroep NV/SA	5493			ub-consolidated	
	Argenta Spaarbank SA/NV	A6N	IZLYKYN1UV7VVGFX65	Su	b-consolidated + Individual	
	8. Crelan SA	5493	300DYPOFMXOR7XM56	C	onsolidated+ Individual	
	AXA Bank Belgium SA	LSG	LSGM84136ACA92XCN876 Sub		ub-consolidated	
2.1b Changes to the list of institutions concerned	N/A					
	Name of institution	New	O-SII buffer	Previo	us O-SII buffer	
	1. KBC Group		1.50%		1.50%	
	KBC Bank NV		1.50%		1.50%	
	2. BNP Paribas Fortis SA/NV		1.50%		1.50%	
	3. Euroclear Holding		1.50%		0.75%	
	Euroclear SA		1.50%		0.75%	
2.2 Level of the buffer	Euroclear Bank SA/NV		1.50%		0.75%	
applied	4. ING Belgium NV		1.50%		1.50%	
	5. Belfius Bank SA/NV		1.50%		1.50%	
	6. The Bank of New York Mellon		0.75%		0.75%	
	7. Investeringsmaatschappij Arge	7. Investeringsmaatschappij Argenta 0.75%		0.75%		
	Argenta Bank- en Verzekeringsgroep (NV/SA		0.75%		0.75%	
	Argenta Spaarbank SA/NV 0.75%			0.75%		
	8. Crelan SA		0.75%		0.75%	
	AXA Bank Belgium SA		0.75%		0.75%	
	Name of identified O-SII	Ult	imate EU parent inst	itution	LEI of ultimate parent	
				institution		
2.3 Name of the ultimate EU	2. BNP Paribas Fortis SA	BNF	BNP Paribas SA		R0MUWSFPU8MPRO8K5P83	
parent institution	3. ING Belgium NV	ING	ING Groep N.V.		549300NYKK9MWM7GGW15	
					· · · · ·	
	Name of parent O-SII identified	Name of O-SII subsidiary		LEI of O-SII subsidiary		
	1. KBC Group NV	Čes	Československá obchodná banka, SK		52990096Q5LMCH1WU462	
		Čes	Československá obchodná banka, CZ		Q5BP2UEQ48R75BOTCB92	
		Unit	United Bulgarian Bank AD		5299000PCY1EP8QJFV48	
2.4 Names of subsidiaries		KBC	KBC Bank Bulgaria EAD		5299009KAL4KO7584196	

e						
27/06/2023.						
The list of O-SIIs and their associated capital buffer rates will be published on 01/12/2023.						
The list of O-SIIs with O-SII scores and associated O-SII buffer rates will be published on the <u>NBB website</u> .						
The new O-SII buffer rates will come into force on 01/01/2024.						
N/A						
Name of institution	Da	te1 Da	ate2 Dat	e3 Date4	Date5	
					%	
annually			buffer rates	will be review	ed	
The O-SII scores based	on data re	ferring to e	end-2022 are	e shown below	1.	
Name of institution	Size	Substitut- ability	Com- plexity	Intercon- nectedness	Overall Score	
1. KBC Group	2519	2191	3242	2088	2510	
2. BNP Paribas Fortis SA/NV	2567	2101	2398	2098	2291	
3. Euroclear Holding	988	2258	1234	1143	1406	
_					1349	
					1120	
Mellon	312	1	617	810	435	
7. Investerings- maatschappij Argenta	415	425	273	395	377	
8. Crelan SA	417	470	100	283	317	
 a. whether you follow. The NBB's O-SII ide on the assessment of b. which threshold so The NBB uses a three score, 7 institutions a in 4.1 and in the exc applying supervisory optional indicators w 350 basis points (see C. whether relevant en 0.02% have been exc 	red the EE ntification of O-SIIs. core has b eshold sco are autom el file), wh y judgemen ith a dome e excel file ntities wit xcluded fi	followed the reen set to re of 350 h atically des ereas Cre ent. Its alter estic scope s). th relative from the ic	ne EBA guid o <i>identify O</i> basis points. signated as lan SA is ide native O-SII e (see 4.3) is total asset lentification	-SIIs; Based on this O-SIIs (see the entified as an C score (based above the the s not in excess process;	L/2014/10 s threshold eir scores D-SII by on reshold of	
	27/06/2023. The list of O-SIIs and the 01/12/2023. The list of O-SIIs with O-published on the NBB weet The new O-SII buffer rate N/A Image: Interview of the institution Image: Interview of the original state original state of the original state of t	27/06/2023. The list of O-SIIs and their associat 01/12/2023. The list of O-SIIs with O-SII scores published on the NBB website. The new O-SII buffer rates will corr N/A Name of institution Da 9 The list of O-SIIs and their associat annually ification and activation of the O-SI The O-SII scores based on data re Name of institution Size 1. KBC Group 2519 2. BNP Paribas Fortis 2567 SA/NV 3. Euroclear Holding 988 4.ING Belgium NV 1283 5. Belfius Bank SA/NV 1268 6. The Bank of New York 312 Mellon 7. Investerings- maatschappij Argenta 8. Crelan SA 4117 Please provide information on: a. whether you followed the EEE The NBB'S O-SII identification on the assessment of O-SIIs. b. which threshold score has bas The NBB uses a threshold score s	27/06/2023. The list of O-SIIs and their associated capital 01/12/2023. The list of O-SIIs with O-SII scores and assoc published on the NBB website. The new O-SII buffer rates will come into force N/A Name of institution Date1 Date1 Date1 1 % 1 The new O-SII buffer rates will come into force N/A Image: Note of the the intermodel of the the interm of the the intermodel of the the intermodel of the intermediate of the intermediate of the intermediate of the intermediate of the intermodel of the intermodel of the intermediate of the intermediate of the intermodel of the intermediate of the intermediate of the intermodel of the intermediate of the intermodel of the inter	27/06/2023. The list of O-SIIs and their associated capital buffer rates 01/12/2023. The list of O-SIIs with O-SII scores and associated O-SII published on the NBB website. The new O-SII buffer rates will come into force on 01/01/2 N/A Name of institution Date1 Date2 Date N/A N/A NA % % % The list of O-SIIs and their associated capital buffer rates annually ification and activation of the O-SII buffer The O-SII scores based on data referring to end-2022 are value of institution Name of institution Size Substitut Compexity 1. KBC Group 2519 2191 3242 2. BNP Paribas Fortis 2557 2101 2398 SANV 1283 1381 1331 5. Beflius Bank SANV 1268 982 670 6. The Bank of New York 312 1 617 7. Investerings- matschappi Argenta 415 425 273 8. Crelan SA 417 470 100 Please provide information on: a. whether you followed the EBA guidelines on the The	27/06/2023. The list of O-SIIs and their associated capital buffer rates will be publish 01/12/2023. The list of O-SIIs with O-SII scores and associated O-SII buffer rates w published on the NBB website. The new O-SII buffer rates will come into force on 01/01/2024. N/A Name of institution Date1 Date2 Date3 Date4 N/A Name of institution Date1 Date2 Date3 Date4 istication and activation of the O-SII buffer The list of O-SIIs and their associated capital buffer rates will be review annually ification and activation of the O-SII buffer The O-SII scores based on data referring to end-2022 are shown below Name of institution Size Substitut- ability Com- plexity Intercon- nectedness 1. KBC Group 2597 2101 2398 2098 3. Euroclear Holding 988 2258 1234 1143 4. ING Beglum NV 1283 1381 1301 1402 5. Beflux Bank SANV 1268 982 670 1558 6. The Bank of New York 312 1 617 810 Melion 1283 1381 1301	

	 <i>d.</i> the names and scores of all relevant entities not excluded from the identification process (could be sent in a separate Excel file, see 4.1); The names and scores of all relevant entities not excluded from the identification process are reported in a separate excel file <i>e.</i> whether non-bank institutions have been included in the calculations. No non-bank institutions have been included in the calculations.
4.3 Supervisory judgement	Crelan SA has been identified as an O-SII by applying supervisory judgement based on four optional indicators in which the global/EU scope is replaced by a national scope: deposits from Belgian households, loans to the Belgian private sector, deposits of Belgian credit institutions and loans to Belgian credit institutions. Please refer to the excel file for the detailed scores. Optional indicators with domestic scope are more appropriate for determining domestic systemic importance. The alternative O-SII score based on these optional indicators is above the threshold score of 350 basis points.
4.4 Calibrating the O-SII buffer	 The EBA scores allow for assigning the identified O-SIIs to two buckets, one with a buffer rate of 1.50% and another one with a buffer rate of 0.75%. Several criteria were accounted for in the O-SII buffer rate calibration, among others: the institution's systemic importance as measured by its size and O-SII score. historical losses in the Belgian banking sector. stress test results. level playing field and single market considerations (with respect to O-SII buffer rates and total capital requirements for O-SIIs in other EU jurisdictions).
4.5 Effectiveness and proportionality of measure	 O-SIIs are institutions whose failure would have an important negative impact on the domestic financial system and/or the real economy. The rationale for imposing capital buffers on O-SIIs is at least twofold. First, capital buffers reduce the probability of failure of O-SIIs, which may be desirable given the high economic and social cost of their failure. Second, capital buffers require O-SIIs to internalize externalities they impose on the financial system and the real economy, and the buffers may provide incentives for O-SIIs to reduce their systemic importance. The Belgian banking sector is large (around 235% of GDP) and highly concentrated, with the 4 largest banks representing 76% of total assets and the 8 identified O-SIIs almost 98%. The identified O-SIIs are institutions of domestic systemic importance, given that their total assets range from 7% to 60% of Belgian GDP and they are also important in terms of credit provisioning and deposit taking for the Belgian economy global custodian services (The Bank of New York Mellon) and activities as an International Central Securities Depository (Euroclear Holding). The O-SII buffers applicable to Belgian institutions were calibrated accounting for the institutions' systemic importance. Banks with a higher O-SII score need to hold a higher O-SII buffer. To this end, Belgian O-SIIs were allocated to two buckets, to which a unique O-SII buffer rate applies. Furthermore, the calibration of the O-SII buffers levels explicitly accounted for level playing field and internal market considerations.

	Given the above considerations, the imposed level of the O-SII buffer is expected to be both effective and proportionate.				
5. Sufficiency, consistency and non-overlap of the policy response					
5.1 Sufficiency of the policy response	For 7 of our O-SIIs, the O-SII buffer rate remains unchanged as it is still assessed to be sufficient. By considering two buckets with a different O-SII buffer rates, the four largest institutions need to hold a larger buffer. In 2024, the higher buffer rate will also be imposed on Euroclear as this institution has seen its balance sheet increase strongly with their cross-border liabilities being inflated because of the international sanctions against Russian entities.				
	In general, no unintended impact on the general economy is expected as institutions have sufficient capital to comply with these (mostly unchanged) O-SII buffers.				
E 2 Consistency of	The NBB considers the O-SII buffer rates to be consistent in that they meet their objectives: (i) strengthening the resilience of these O-SIIs and (ii) internalise the externalities imposed on the financial system and the real economy.				
5.2 Consistency of application of the policy response	The O-SII methodology has also been applied consistently over time, resulting in very stable O-SII buffer rates. The main exception is the very specific case of Euroclear whose O-SII buffer rate will increase from 0.75% to 1.5%, as this institution has seen its balance sheet increase strongly with their cross-border liabilities being inflated because of the international sanctions against Russian entities.				
5.3 Non-overlap of the policy response	NBB sees no overlap between its O-SII buffers and other macroprudential policy instruments, as they do not address the same systemic risk.				
6. Cross-border and cros	s-sector impact of the measure				
6.1 Assessment of cross- border effects and the likely impact on the Internal Market (Recommendation ESRB/2015/2 ³)	The higher capital requirements following the implementation of the O-SII buffer structurally increase the resilience of Belgian systemically important institutions. This positively affects the stability of the financial system and the real economy in Belgium, and with that, the internal market. As the O-SII buffer is applied to the Belgian O-SIIs at the consolidated level, there may be an impact on individuals or companies outside Belgium through exposures of subsidiaries and branches of Belgian banks in other jurisdictions. However, no major cross-border impact has been observed. There are several potential reasons for this limited impact:				
	 First, for most banks, FINREP data show that exposures in Member States other than Belgium (both in terms of total assets and loans and advances to 				

³ Recommendation of the European Systemic Risk Board of 15 December 2015 on the assessment of cross-border effects of and voluntary reciprocity for macroprudential policy measures (ESRB/2015/3) (OJ C 97, 12.3.2016, p. 9).

	 non-financial corporations and households) generally amount to only a small fraction of these Member States' GDP. Second, to the extent that EU parent companies and/or important subsidiaries in other Member States are subject to G-SIB or local O-SII buffer requirements, the Belgian O-SII buffer does not increase capital requirements for these exposures in these Member States.
	No major leakages have been observed.
	- First, the O-SII buffer is applied to the Belgian systemically relevant institutions at the consolidated level, which avoids (geographical) shifts of activities within a banking group. Universal banks may shift activities from the bank to the insurance part of the group, but no such effects have been observed.
6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State	- Second, Belgian O-SIIs may restrict activities to reduce their systemic importance, which may entail a shift of activities to other bank or non-bank entities. There is no evidence that such effects have occurred, which may be explained by the fact that the reduction in activities needed for the large Belgian O-SIIs to bring their O-SII scores down to a level that would put them in a lower bucket with a lower buffer is very large. Furthermore, possible shifts of activities also have beneficial effects if they are the result of SIIs internalizing externalities they impose on the financial system and reducing their systemic importance.
	The NBB closely monitors any of these potential leakages.

Combinations and interactions with other measures	

7.

	N/A				
7.1 Combinations between G- SII and O-SII buffers	Name of institution	O-SII buffer	G-SII buffer		
		%	%		
(Article 131.14)		%	%		
		%	%		
7.2 Combinations with systemic risk buffers (SyRBs) (Article 131.15 CRD)	 Are any of the institutions idem buffer? If yes, please provide the a. What is/are the systemic rind Of the 8 institutions identified risk buffer of 9%, applicable to immovable property for which Belgium (both non-defaulted b. At what level is/are the systemic consolidation level and/or The sectoral systemic risk but (see table) c. Is the sum of the systemic the higher of the G-SII and SII buffer and to an O-SII buffer institution is subject over stand when simply adding up the tw risk buffer and the O-SII buffer 	the following information: sk buffer rates(s)? as O-SII, 6 are also subject to their IRB retail exposures in the collateral (immovable and defaulted exposures). stemic risk buffer rate(s) at individual)? ffer is applied at consolidated risk buffer rate(s) and the O-SII buffer rates, if a ground uffer at consolidated leve 5%? wo percentages, the sum of	to a sectoral systemic secured by residential property) is located in applied (i.e. ed and individual level e O-SII buffer rate (or sup is subject to a G- I) to which the same		

	Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O- SII and SyRB rates
	1. KBC Bank NV	9%	Consolidated	10.5%
	2. BNP Paribas Fortis SA/NV	9%	Sub-consolidated	10.5%
	4. ING Belgium NV	9% Sub-consolidated		10.5%
	5. Belfius Bank SA/NV	9%	Consolidated	10.5%
	7. Argenta Spaarbank SA/NV	9%	Consolidated	9.75%
	8. Crelan	9%	Consolidated	9.75%
	AXA Bank Belgium	9%	Consolidated	9.75%
	The cap for the subsidiary do buffer rate based on the dom	•	-	i of a higher 0-Sil
7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)	Name of O-SII subsidiary	Name of the EU parent of the O-SII subsidiary		Buffer applicable to O- SII EU parent
	2. BNP Paribas Fortis SA/NV	BNP Paribas SA		1.50%
	4. ING Belgium NV	ING Groep N.V.		2.50%
			%	
8. Miscellaneous				
8.1 Contact person(s)/mailbox at notifying authority	Annick Bruggeman – <u>annick.</u> Alexandre Francart – <u>alexano</u> Alexandre Reginster – <u>alexar</u> Thomas Schepens – <u>thomas</u>	Ire.francart@nbb. ndre.reginster@nb	<u>be</u> - +32 2 221 5 <u>b.be</u> - +32 2 22 ⁻	52 09 1 35 03
8.2 Any other relevant information				
8.3 Date of the notification	18/07/2023			