



## 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) Regulation<sup>1</sup>);
- <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 measure<sup>2</sup>.

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 aut	nority		
1.1 Name of the notifying authority	Central Bank of Iceland		
1.2 Country of the notifying authority	Iceland		
2. Description of the mea	asure		
	On which institution(s) is the (LEI) code)?	e measure applied (name	and Legal Entity Identifier
	Is the measure applied at:		
2.1a Institution or group of	- The highest level of consolidation?		
institutions concerned	- A sub-consolidated level?		
	- An individual level?		
	Name of institution	LEI	Consolidation level
	Arion banki hf.	RIL4VBPDB0M7Z3K XSF19	highest level of consolidation

<sup>&</sup>lt;sup>1</sup> 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).

<sup>&</sup>lt;sup>2</sup> 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authority, it may be agreed with the Head of the ESRB Secretariat that this notification, or a part thereof, should not be published for reasons of confidentiality or financial stability.

		5 40000 D THE O D TO O	
	Íslandsbanki hf.	549300PZMFIQR79Q 0T97	highest level of consolidation
	Landsbankinn hf.	549300TLZPT6JELD WM92	highest level of consolidation
		VVIVI32	Consolidation
2.1b Changes to the list of institutions concerned		2.1a any changes to the list as e an explanation, if applicable	
	At what level is the fully	y phased-in buffer (in %) appli	ed to the institution(s)?
	Name of institution	New O-SII buffer	Previous O-SII buffer
	Arion banki hf.	2%	2%
2.2 Level of the buffer			
applied	Íslandsbanki hf.	2%	2%
	Landsbankinn hf.	2%	2%
		ne and LEI code of the ultimat	-
	group for each of the O the concerned institutio The institutions are in a	D-SIIs identified. if the ultimate on itself. all cases the ultimate parent in	EU parent institution is not
2.3 Name of the ultimate EU	group for each of the O the concerned institutio	D-SIIs identified. if the ultimate on itself. all cases the ultimate parent in	EU parent institution is not
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	group for each of the O the concerned institution The institutions are in a Name of identified O-St If any of the O-SIIs ider (sub)consolidated level	D-SIIs identified. if the ultimate on itself. all cases the ultimate parent in	EU parent institution is not astitutions.
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3. Timing for the measur	e					
3.1 Timing for the decision	What is the date of the <u>ECB:</u> provide the date Supervisory Mechanis	on which the	e decision re	eferred to in	Article 5 of t	
	05/12/2023					
3.2 Timing for publication	What is the date of pul	blication of th	ne notified n	neasure?		
	06/12/2023					
	Information about the sthe market.	Information about the strategy for if the communicating the notified measure to the market.				
3.3 Disclosure	All information on deci Bank's website, see he policy/capital-buffers/.					
3.4 Timing for application	What is the intended date of application of the measure? 06/12/2023					
	What is the intended timeline for the phase-in of the measure?					
3.5 Phasing in	Name of institution	ו Da	te1 Date	e2 Date	3 Date4	Date5
			%		%	%
		9	% %	%	%	%
3.6 Review of the measure	When will the measure that the buffer, the iden must be reviewed at le	ntification of east annually	O-SIIs and )?	their allocat	ion to subcat	
	The measure will likely	/ be reviewed	d during Q3	or Q4 of 20	24.	
4. Reason for O-SII ident	ification and activation	of the O-SI	l buffer			
	Please list here the na identified based on	mes, overall	scores and	category so	cores of the (	D-SIIs
	a. size;					
	b. importance fo capturing sub		-			he Union,
	c. complexity, ir activity;	ncluding the a	additional co	omplexities	from cross-b	order
4.1 Scores of institutions or group of institutions	<ul> <li>interconnectedness of the institution or (sub-)group with the financial system.</li> </ul>					
concerned, as per EBA guidelines on the	According to TITLE II	of EBA guide	lines the sc	ores are as	follows.	
assessment of O-SIIs	Name of institution	Size	Substitut- ability	Com- plexity	Intercon- nectedness	Overall Score
(Article 131.3 CRD)	Arion banki hf.	2711	2919	3419	3177	3075
	Íslandsbanki hf.	2913	2833	3247	3627	3155
	Landsbankinn hf.	3324	3447	2423	1830	2756

	Please provide other relevant information (indicator values, methodology, calculations and formulas, data sources, information set used for denominators) in a separate Excel file. The Financial Stability Committee of the Central Bank of Iceland uses the EBA guidelines as part of the assessment procedure for systemic importance of financial institutions in Iceland. Mandatory indicators are used according to TITLE II of the guidelines and scores calculated as the first step in the process of informing the committee of systemic importance.
	In step two of the process (TITLE III of the guidelines) one additional indicator is used in the Importance category. The additional indicator measures financial institutions' share of FX market turnover. This additional indicator is used due to the systemic importance of the FX market for the domestic economy. Also, one institution is added to the assessment due to its relatively large exposures to households and corporates as well as significant outstanding debt securities. Scores are calculated and compared with scores from the previous step. Expert assessment is then used to determine which institutions should be classified as O-SII. According to the Act on the Central Bank and the Act on financial institutions financial institutions should not be identified as O-SII unless their operations can affect financial stability. Expert assessment is therefore needed. The expert assessment of the Committee includes a detailed examination of business plans and operations of financial institutions as well as examination of individual indicator scores from the first and second step of the process. Due to relatively low amounts governing scores for some of the indicators mandated by the EBA guidelines, they are not relevant to financial stability in Iceland. Less emphasis is therefore given to some of the indicators when assessing systemic importance.
4.2 Methodology and	<ul> <li>Please provide information on:</li> <li>a. whether you followed the EBA guidelines on the assessment of O-SIIs;</li> <li>b. which threshold score has been set to identify O-SIIs;</li> <li>c. whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process;</li> <li>d. 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);</li> <li>e. whether non-bank institutions have been included in the calculations.</li> </ul>
indicators used for designation of the O-SII (Article 131.3)	<ul> <li>A. See 4.1.</li> <li>B. In order to take account of the specificities of the banking sector in Iceland and the resulting statistical distribution of the scores, also ensuring the homogeneity of the group of O-SII's designated the threshold is not used. Expert assessment of the Financial Stability Committee is used to determine systemic importance of Icelandic financial institutions (see 4.1. for details)</li> <li>C. No institutions are excluded from the identification process.</li> <li>D. Scores of relevant institutions not identified as O-SII are not published.</li> <li>E. One non-bank institution is included in the calculations in the second step of the identification process, but not identified as O-SII as the institution falls out of scope of the buffer requirement and CRD.</li> </ul>

	Have any of the institutions listed in 2.1 been identified by applying supervisory
	judgement as laid down in EBA guidelines on the assessment of O-SIIs? If yes, please list the respective institutions and provide information on:
4.3 Supervisory judgement	<ul> <li>a. which of the optional indicators have been used to justify the supervisory assessment decisions, if any, and what the scores were;</li> <li>b. why these optional indicators are relevant for the Member State;</li> <li>c. why the bank is systemically important in terms of those particular optional indicators.</li> </ul>
	Please provide information on the criteria and indicators used to calibrate the level of the O-SII buffer requirement and the mapping to institution-specific buffer requirements.
4.4 Calibrating the O-SII buffer	As all institutions identified as O-SII have very similar importance to the Icelandic financial system and economy. A 2% buffer has therefore been applied to all O-SII banks. If the need arises a bucketing approach will be considered in line with the approach EBA has proposed.
	Please provide a justification for why the O-SII buffer is considered likely to be effective and proportionate to mitigate the risk.
	The combined size of the three institutions identified as O-SII represents about 80% of the assets of the domestic financial sector (taking into account one non-bank institution). The banks provide important services to the real economy, both to companies and households.
4.5 Effectiveness and proportionality of measure	The O-SII buffer applicable to Icelandic banks was calibrated accounting for the banks' systemic importance. The structure of the Icelandic financial sector is such that there are three very large and systemically important institutions that dominate the market with five very small savings and loans banks, mostly operating in rural areas, one small commercial bank and a few small financing companies. The failure of one of the O-SII could have widespread negative effects and result in contagion effects to other banks, due to deteriorating credit ratings, and access to foreign financial markets might be affected.
	Capital buffers reduce the risk of failure of systemically important institutions and thus the probability of negative effects on the real economy.
	Given the above considerations and the assessment of systemic importance according to the EBA guidelines, a 2% CET1 level of the O-SII buffer is considered effective and proportionate for all three banks identified as O-SIIs.
5. Sufficiency, consisten	cy and non-overlap of the policy response
5.1 Sufficiency of the policy	For a macroprudential policy to be 'sufficient', the policy responses must be deemed to significantly mitigate, or reduce the build-up of, risks over an appropriate time horizon with a limited unintended impact on the general economy.
response	Note that the ESRB will use the assessment of the macroprudential stance as relevant input in assessing the sufficiency of the macroprudential policy in the Member State.
	Please provide any additional information that the ESRB should consider in assessing the sufficiency of the policy response.
	The Central Bank of Iceland deems the buffer requirements sufficient to significantly mitigate the systemic risks of systemic importance. The buffer is

5.2 Consistency of application of the policy response	systemic importance and is sufficient at present, considering the specificities of the lcelandic banking sector and economy. During the time the buffer has been in effect, no unintended effects have been observed, e.g., regarding excessive deleveraging, search for yield or increased risk taking or leakages to the non-bank sector. For a macroprudential policy to be 'consistent', the policy instruments meet their respective objectives, as outlined in ESRB/2013/1 <sup>3</sup> , and must be implemented in accordance with the common principles set out in the relevant legal texts. Note that the ESRB assessment of consistency will consider whether the same systemic risks are addressed in a similar way across and within the Member States over time. Please provide any additional information that the ESRB should consider in assessing the consistency of the policy response. The Central Bank of Iceland considers the approach used to identify systemically important banks in Iceland to be consistent and in line with relevant legal
	requirements and guidelines, e.g., the relevant Icelandic legislation implementing CRD and, to a large extent, EBA guidelines no. EBA/GL/2014/10. The increased capital requirements associated with the systemic importance mitigates the risk of contagion by bolstering the resilience of systemically important banks. As all three systemically important banks in Iceland adhere to similar business plans and are equivalent in size the capital requirement due to systemic importance is also equivalent.
5.3 Non-overlap of the policy response	<ul> <li>For a policy instrument to be 'non-overlapping', it should aim to address a systemic risk that either differs from a risk addressed by other active tools in the same Member State, or be complementary to another tool in that Member State which addresses the same systemic risk.</li> <li>Are other policy instruments used to address the <u>same</u> systemic risk?</li> <li>If yes, please explain the need for more than one instrument to address the same systemic risk and how the different instruments interact with each other.</li> <li>No other measures are used to address the systemic risks related to systemic</li> </ul>
6. Cross-border and cros	importance of financial institutions. s-sector impact of the measure
6.1 Assessment of cross- border effects and the likely	<ul> <li>Assessment of the cross-border effects of implementation of the measure.</li> <li>a. Assessment of the spillover channels operating via risk adjustment and regulatory arbitrage. The relevant indicators provided in Chapter 11 of the</li> </ul>
impact on the Internal Market (Recommendation ESRB/2015/2 <sup>4</sup> )	<ul> <li>ESRB Handbook on Operationalising Macroprudential Policy in the Banking Sector<sup>5</sup> and the <u>Framework to assess cross-border spillover effects of macroprudential policies</u> of the ECB Task Force on cross-border spillover effects of macroprudential measures can be used.</li> <li>b. Assessment of the:</li> </ul>

<sup>&</sup>lt;sup>3</sup>Recommendation of the European Systemic Risk Board of 4 April 2013 on intermediate objectives and instruments of macro-prudential policy (ESRB/2013/1) (OJ C 170, 15.6.2013, p. 1) <sup>4</sup>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). <sup>5</sup> Available on the ESRB's website at www.esrb.europa.eu.

	jurisdiction (inwa	ects of implementat rd spillovers); ects on other Memb		
		asure (outward sp the Single Market	,	ation of the
	Since Icelandic banks have ve this measure is very unlikely to internal market. Also, due to th	have any cross-b	order effects o	r impact on the
	and remains unchanged. Referring to your Member Stat "leakages and regulatory arbit the measure/leakages to othe	rage" in your own j	urisdiction (i.e.	=
	Is there scope for "leakages a	nd regulatory arbitr	age" in other j	urisdictions?
6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State	Possible leakages are very un highest consolidation level the geographical location within gr to be not classified as O-SII do operations would need to be e already maintain the 2% CET1 introduced in full on 1 April 20 buffer, at this time, is therefore own funds requirements. Leak has not been observed since t to the introduction, increase or	re are no risks of s oups. Also, the risl pes not apply in Ice xtremely large. The capital to meet the 16. The impact of the assessed to be no ages to the non-ba he introduction of t	hifts in activity < of reduced of land since the banks affects e O-SII buffer a he application butral w.r.t. len ink sector is a he buffer in 20	w.r.t. perations in order reduction in ed by the measure as it was of the O-SII ding growth and possibility, but this 16, nor in relation
7. Combinations and inte	ractions with other measures			
	If both G-SII and O-SII criteria		institution at c	onsolidated level,
	which of the two buffers is the	highest?		
7.1 Combinations between G- SII and O-SII buffers	N/A			
(Article 131.14)	Name of institution	O-SII but	ifer	G-SII buffer
		%		%
		%		%
	Are any of the institutions iden		piect to a syste	
	If yes, please provide the follo a. What is/are the syste	wing information:		
7.2 Combinations with systemic risk buffers	b. At what level is/are th consolidation level ar	e systemic risk but	. ,	blied (i.e.
(SyRBs) (Article 131.15 CRD)	c. Is the sum of the syst the higher of the G-S SII buffer and to an C institution is subject o	I and O-SII buffer i S-SII buffer at cons	rates, if a grou	p is subject to a G-
	Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O- SII and SyRB rates

n a consolidated l lated basis of the e cap for the subs	•	SII or O-SII buffer	rate on a
SII is a subsidiary n a consolidated l lated basis of the e cap for the subs	y Name of the EL	Consolidation level, domestic exposures only Consolidation level, domestic exposures only stitution subject to SII or O-SII buffer nplementation of a nethodology?	5% % % % % a G-SII or O-SII rate on a higher O-SII higher O-SII
SII is a subsidiary n a consolidated l lated basis of the e cap for the subs ased on the dome	y Name of the EL	Consolidation level, domestic exposures only stitution subject to SII or O-SII buffer nplementation of a nethodology?	%         %         %         %         %         a G-SII or O-SII         rate on a         higher O-SII         Buffer         applicable to O-SII EU parent         %
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n a consolidated I lated basis of the e cap for the subs ased on the dome	basis, what is the G e parent institution? psidiary prevent the in estic buffer setting m y Name of the EL	SII or O-SII buffer nplementation of a nethodology?	rate on a higher O-SII Buffer applicable to O- SII EU parent %
e of O-SII subsidiary	•	•	applicable to O- SII EU parent %
			0/_
			%
			70
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