



# 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:

- macropru.notifications@ecb.europa.eu 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.

Notifying national aut	hority				
1.1 Name of the notifying authority	Austrian Financial Market A	uthority			
1.2 Country of the notifying authority	Austria.				
2. Description of the me	asure				
	On which institution(s) is the measure applied (name and Legal Entity Identifier (LEI) code)?				
	Is the measure applied at:				
	- The highest level of consolidation?				
2.1a Institution or group of	- A sub-consolidated level?				
institutions concerned	- An individual level?				
	Consolidated				
	Name of institution	LEI	Consolidation level		
	Erste Group Bank AG	PQOH26KWDF7CG10L 6792	consolidated		

<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).

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authority, it may be agreed with the Head of the ESRB Secretariat that this notification, or a part thereof, should not be published for reasons of confidentiality or financial stability.

Raiffeisen Bank International AG	9ZHRYM6F437SQJ6OU G95	consolidated
UniCredit Bank Austria AG	D1HEB8VEU6D9M8ZU XG17	consolidated
BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	529900ICA8XQYGIKR3 72	Consolidated at the level of BAWAG Group AG
RAIFFEISEN-HOLDING NIEDERÖSTERREICH- WIEN registrierte Genossenschaft mit beschränkter Haftung	529900SXEWPJ1MRRX 537	consolidated
Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	I6SS27Q1Q3385V753S 50	Consolidated at the level of Raiffeisenbankengruppe OÖ Verbund eGen
Volksbank Wien AG	529900D4CD6DIB3CI90 4	Consolidated at the level of the Volksbanken Verbund

# Individual Level

Name of institution	LEI	Consolidation level
Erste Group Bank AG	PQOH26KWDF7CG10L 6792	Individual level
Raiffeisen Bank International AG	9ZHRYM6F437SQJ6OU G95	Individual level
UniCredit Bank Austria AG	D1HEB8VEU6D9M8ZU XG17	Individual level
BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	529900ICA8XQYGIKR3 72	Individual level
RAIFFEISENLANDESBAN K NIEDERÖSTERREICH- WIEN AG	529900GPOO9ISPD1E E83	Individual level
Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	I6SS27Q1Q3385V753S 50	Individual level

	Erste Bank der	549300HUKIA1IZQHFZ	Individual level	
	oesterreichischen Sparkassen AG	83		
	Steiermärkische Bank und Sparkassen Aktiengesellschaft	549300DVPJYGNF2P7 B03	Individual level	
2.1b Changes to the list of institutions concerned	(549300DVPJYGNF2P7 supervisory judgement	che Bank und Sparkassen A 'B03); at the individual level;	<u> </u>	
	Consolidated			
	Name of institution	New O-SII buffer	Previous O-SII buffer	
	Erste Group Bank AG	1,50 %	1,25 %	
	Raiffeisen Bank International AG	1,50 %	1,25 %	
	UniCredit Bank Austria AG	1,75 %	1,75 %	
	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	0,90 %	0,75 %	
	RAIFFEISEN- HOLDING NIEDERÖSTERREICH- WIEN registrierte Genossenschaft mit beschränkter Haftung	0,90 %	0,75%	
2.2 Level of the buffer applied	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	0,90 %	0,75 %	
	Volksbank Wien AG	0,90 %	0,75 %	
	Individual Level			
	Name of institution	New O-SII buffer	Previous O-SII buffer	
	Erste Group Bank AG	1,75 %	1,75 %	
	Raiffeisen Bank International AG	1,75 %	1,75 %	
	UniCredit Bank Austria AG	1,50 %	1,25 %	
	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	0,50 %	0,50 %	
	RAIFFEISENLANDESBANK NIEDERÖSTERREICH-WIEN AG	0,90 %	0,75 %	
	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	0,90 %	0,75 %	
	Erste Bank der oesterreichischen Sparkassen AG	0,90 %	0,75 %	
	Steiermärkische Bank und Sparkasse AG	0,25 %	0,00 %	

	T =					
		nd LEI code of the ultimate E	· ·			
	= :	s identified. if the ultimate EU	J parent institution is not			
	the concerned institution its	elf.				
	Name of identified O-SII	Ultimate EU parent institution	LEI of ultimate parent institution			
	UniCredit Bank Austria AG	UniCredit S.p.a.	549300TRUWO2CD2G5692			
2.3 Name of the ultimate EU	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	Raiffeisenbankengruppe OÖ Verbund eGen	529900XSTAE561178282			
parent institution	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	BAWAG Group AG	529900S9YO2JHTIIDG38			
	Erste Bank der oesterreichischen Sparkassen AG	Erste Group Bank AG	549300HUKIA1IZQHFZ83			
	Steiermärkische Bank und Sparkassen AG	Erste Group Bank AG	549300DVPJYGNF2P7B03			
	If any of the O-SIIs identifie	d is a parent institution and t	he buffer is applied at a			
	1 ' '	ase name the subsidiaries o	f the institution that are			
	notified as O-SIIs (please g	ive names and LEI codes).				
	Name of parent O-SII identified	Name of O-SII subsidiary	LEI of O-SII subsidiary			
	Raiffeisen Bank International AG	Tatra banka, a.s.	3157002JBFAI478MD587			
	Raiffeisen Bank International AG	Raiffeisenbank Austria d.d	529900I1UZV70CZRAU55			
2.4 Names of subsidiaries	Raiffeisen Bank International AG	Raiffeisenbank, a.s.	3157001000000000000			
	Raiffeisen Bank International AG	Raiffeisen Bank S.A.	549300RFKNCOX56F8591			
	Raiffeisen Bank International AG	Raiffeisen Bank Zrt	5493001U1K6M7JOL5W45			
	Erste Group Bank AG	Erste Bank Hungary Zrt	549300XWJHRKLHU2PS28			
	Erste Group Bank AG	Slovenská sporiteľňa, a.s.	549300S2T3FWVVXWJI89			
	Erste Group Bank AG	Erste&Steiermärkische Bank d.d.	549300A2F46GR0UOM390			
	Erste Group Bank AG	Česká spořitelna, a.s	9KOGW2C2FCIOJQ7FF485			
	Erste Group Bank AG	Banca Comercială Română S.A.	549300ORLU6LN5YD8X90			
3. Timing for the measur	e					
3.1 Timing for the decision	20/12/2023					
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3.2 Timing for publication	28/12/2023					
3.3 Disclosure	The amended Capital Buffer Regulation will be published in the Federal Law Gazette and on the FMA website (including explanatory notes).					
3.4 Timing for application	What is the intended date of application of the measure? Year end 2023 = 01/01/2024					
	What is the intended timeling	ne for the phase-in of the me	asure?			
3.5 Phasing in	The buffer values for 2024 follow exactly the phasing in as communicated in our notification as of 21 November 2022. No decision on any further increase in buffer values for 2025 or beyond will be taken this year. Instead, depending on the results of the re-evaluation 2024 and the economic/geopolitical circumstances at that time, further increases in buffer values to the levels indicated by our current methodology may be decided for 2025.  Date 1: 2024					
	Date 2: 2025					

Name of institution	Date1	Date2	Date3	Date4	Date5
Steiermärkische Banken und Sparkassen AG	0.25%	0.50 or 0.90%			

#### 3.6 Review of the measure

Review in September 2024.

### 4. Reason for O-SII identification and activation of the O-SII buffer

Consolidated	
Name of instit	tı

Name of institution	Size	Substitut- ability	Com- plexity	Intercon- nectedness	Overall Score
Erste Group Bank AG	2.767	2.611	3.586	1.850	2.703
Raiffeisen Bank International AG	1.766	1.325	3.033	1.861	1.996
UniCredit Bank Austria AG	917	1.265	1.048	917	1.037
BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	483	764	522	514	571
RAIFFEISEN-HOLDING NIEDERÖSTERREICH- WIEN registrierte Genossenschaft mit beschränkter Haftung	251	351	165	451	304
Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	416	487	315	694	478
Volksbank Wien AG	250	309	54	104	179

4.1 Scores of institutions or group of institutions concerned, as per EBA guidelines on the assessment of O-SIIs (Article 131.3 CRD)

# Individual Basis

Name of institution	Size	Substitut- ability	Com- plexity	Intercon- nectedness	Overall Score
Erste Group Bank AG	771	600	1.388	1.912	1.168
Raiffeisen Bank International AG	791	678	1.515	1.953	1.234
UniCredit Bank Austria AG	886	1.233	977	902	999
BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	485	747	517	582	583
RAIFFEISENLANDESBANK NIEDERÖSTERREICH- WIEN AG	259	344	151	543	324

	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	397	482	301	807	497
	Erste Bank der oesterreichischen Sparkassen AG	360	296	42	284	245
	Steiermärkische Bank und Sparkassen AG	159	150	17	99	106
	Please provide othe calculations and for in a separate Excel	mulas, data so	•			
4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)	b. which thres c. whether re have been d. the names identification	emation on: ou followed the shold score has levant entities of excluded from and scores of on process (colon-bank institut	s been set to with relative t the identifica all relevant e ıld be sent in	identify O- total assets ation proce ntities not on a separate	SIIs <b>275</b> ; s not in exce ss <b>NO</b> ; excluded fro e Excel file,	ss of 0.02% om the see 4.1);
	In order to avoid sho observation period of 3 institutions have	of 1-year is bei	ng applied in	general.		
4.3 Supervisory judgement	guaranteed under d Volksbank Wien pursuant to Article Erste Bank der oes Steiermärkische B  a. which of th assessmer guarantee 300bp (3.0 b. why these Especially can cause the case o c. why the ba	eposit guarante AG (on consections and austrian and spart e optional indicent decisions, if a dunder deposite and auder deposite auder deposite auder deposite australia auder deposite auder auder deposite auder au	ee system wi solidated b Banking Ac n Sparkasse kassen AG ( eators have b any, and what sit guarante tors are relev with a high d n or overload iculties; ally important	th threshol  asis of V  en AG (ind  individual  een used to  at the score  e system v  vant for the legree of g  ading of th  t in terms of	d of 300 bp)  /olksbanke lividual bas basis)  to justify the es were Dep with thresho  Member Sta juaranteed e financial of those parti	is) supervisory posits old of ate deposits system in
4.4 Calibrating the O-SII buffer		636 CI 637- 1.	Overlap with SyRP 0% ET1 12.5	Value	ed Roui Valu 0.88%	0.90%
		≥1,00 2.	ET1 12.5 0% 12.5 ET1		1.75%	1.75%

	Quelle: OeNB.  Calibration has remained unchanged since last year.  The subcategories (buckets) enable to differentiate the institutions depending on the score. In particular, the difference between EGB, RBI, UCBA and all other identified institutions is very large and could be considered in the best way possible by the calibration.  To avoid overlaps with the SyRB, ie that the same risk is addressed two times, the O-SII buffer sizes were reduced by 12.5% (see table above).  Institutions, which are identified via supervisory judgement, are assigned to Bucket 1.
	Refer to 5.3. regarding the overlap with the SyRP.
4.5 Effectiveness and proportionality of measure	Systemically relevant institutions can pose a risk to the entire financial system of a country or the euro area. The systemic relevance and anticipation of resulting state aid measures in the event of a crisis can lead to moral hazard. The associated implicit state guarantee reduces the refinancing costs of these banks, which exacerbates this problem. Systemically important banks thus take on disproportionate risks, which can lead to exogenous costs for other banks as well as for non-banks. The capital buffer aims to internalise these externalities, reduce the probability of failure and reduce the social costs of failure.  Due to the UA/RU war, accompanied by high inflation and an unclear economic outlook the increase in O-SII buffer (net of decreases of the SyRB) has been subject to a phase-in over a period of two years. So the increase by 0.5 pp has been split up into two steps of 0.25 pp. The second step will come into force as of 1 January 2024.
5. Sufficiency, consisten	cy and non-overlap of the policy response
5.1 Sufficiency of the policy response	The scope of the O-SII identification process and the level of O-SII buffers applied are of sufficient nature to significantly mitigate and reduce the contagion effects these institutions could cause. The buffer calibration is structured in that it meets the policy objective while taking into account the importance of structural specifics of the Austrian banking market. Especially including also such institutions with a high degree of guaranteed deposits. The setting of the O-SII buffer aims at increasing the risk-bearing capacity of systemically important institutions, to preserve the built-up capital within these.
5.2 Consistency of application of the policy response	The policy response of setting an O-SII buffer is consistent with the goal of limiting the potential risks stemming from a failure of these institutions on the overall Austrian banking market. The measure is applied in a consistent manner, strengthening the resilience of financial infrastructure trough build-up of loss absorption capacity within these institutions.

	Are other policy instruments used to address the <u>same</u> systemic risk? <b>No</b>
5.3 Non-overlap of the policy response	The EU Capital Requirements Directive (CRD V) foresees additivity of the other systemically important institutions buffer (OSII buffer, Article 131 CRD V) and the systemic risk buffer (SyRB, Article 133 CRD V). The SyRB addresses systemic risks arising from the structural characteristics of the Austrian banking system, i.e. risks that are concentrated in a number of banks that are too risk-ex-posed in case of a systemic event. These systemic risks concern systemic vulnerability and systemic concentration risk. Addressing the too-big-to-fail problem, the OSII buffer aims to reduce the probability of large, systemically important credit institutions to malfunction or fail as well as to limit any related damage for the financial system and the real economy.
	In light of the interaction between the two buffers, the buffer requirements should not simply be added together. A purely mechanical approach and precise quantification of any overlap also appear inappropriate given the complexity of systemic risk. AT uses two complementary approaches to conservatively estimate the magnitude of potential overlap, namely
	(1) a structural approach – (Construction of AT-interbank network. Quantification according to the volume of edges where a SyRB bank lends to an OSII bank. Ratio: no double counting of risks from the surrounding system onto the surrounding system.); and
	(2) a network approach (Estimation of the reduction of risks, which are addressed by the OSII and the SyRB, by considering the "activation" of the respective other buffers. Based with regards to the OSII on - Reduction of the sLGDs by improved absorption capacity of the system – and with regards to the SyRB on - Estimation of the decrease in crisis probability.)
	The structural approach is used to estimate the reduction in structural systemic risks addressed by the OSII buffer or the SyRB by considering the effect of the other buffer. Based on this approach, the overlap comes to 12.5% for the OSII buffer and 25% for the SyRB. According to the network approach, the combined overlap amounts to around 40%. This value, which has to be attributed to both buffers — so each about 20% —, roughly corresponds to the outcome of the structural approach.  After overlap, the SyRB further needs to be rounded due to legal restrictions to steps of 50bps.
6. Cross-border and cros	ss-sector impact of the measure
6.1 Assessment of cross- border effects and the likely impact on the Internal Market (Recommendation ESRB/2015/2³)	In line with the findings on the economic impact of the systemic risk buffer at the national level, cross-border effects are considered to be marginal.
6.2 Assessment of leakages and regulatory arbitrage	

### 7. Combinations and interactions with other measures

N/A

within the notifying Member

State

<sup>&</sup>lt;sup>3</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).

	N/A					
7.1 Combinations between G-	Name of institution	O-SII b	uffer	G-SII buffer		
SII and O-SII buffers		%		%		
(Article 131.14)		%		%		
		%		%		
	Are any of the institutions subject to a systemic risk buffer? YES					
7.2 Combinations with systemic risk buffers (SyRBs) (Article 131.15 CRD)	If yes, please provide the following information:					
	a. What is the level of the systemic risk buffer (in %) applied to the					
	concerned institution see below					
	<ul> <li>At what level is/are the systemic risk buffer rate(s) applied (i.e. consolidation level and/or individual)? The systemic risk buffer is applied at the same consolidation level as the O-SII buffer.</li> </ul>					
	c. Is the sum of the systemic risk buffer rate(s) and the O-SII buffer rate (c					
	the higher of the G-SII and O-SII buffer rates, if a group is subject to a C					
	SII buffer and to an O-SII buffer at consolidated level) to which the san					
	institution is subject over 5%? <b>NO</b>					
	Consolidated					
	Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O- SII and SyRB rates		
	Erste Group Bank AG	1,00 %	consolidated	2,50 %		
	Raiffeisen Bank International AG	1,00 %	consolidated	2,50 %		
	UniCredit Bank Austria AG	0,50 %	consolidated	2,25 %		
	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	0,50 %	consolidated	1,40 %		
	RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung	0,50 %	consolidated	1,40 %		
	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	0,50 %	consolidated	1,40 %		
	Volksbank Wien AG	0,50 %	consolidated	1,40 %		
	Individual Basis					
	Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O- SII and SyRB rates		
	Erste Group Bank AG	0,50 %	Individual basis	2,25 %		
	Raiffeisen Bank International AG	0,50 %	Individual basis	2,25 %		
	UniCredit Bank Austria AG	0,50 %	Individual basis	2,00 %		
	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	0,50 %	Individual basis	1,00 %		
	RAIFFEISENLANDESBANK NIEDERÖSTERREICH-WIEN AG	0,50 %	Individual basis	1,40 %		
	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	0,50 %	Individual basis	1,40 %		
	Erste Bank der oesterreichischen Sparkassen AG	0,00 %	Individual basis	0,90 %		
	Steiermärkische Bank und Sparkassen AG	0,00%	Individual basis	0,25%		

7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)	If the O-SII is a subsidiary of an EU parent institution subject to a G-SII or O-SII buffer on a consolidated basis, what is the G-SII or O-SII buffer rate on a consolidated basis of the parent institution? UniCredit S.p.a.: O-SII buffer 1.50 % (For details please see the decision of the Banca d'Italia)  Does the cap for the subsidiary prevent the implementation of a higher O-SII buffer based on the domestic buffer setting methodology? No				
	Name of O-SII subsidiary	Name of the EU parent of the O-SII subsidiary	Buffer applicable to O- SII EU parent		
	UniCredit Bank Austria AG	UniCredit S.p.a.	1.50 %		
			%		
			%		
8. Miscellaneous					
8.1 Contact	Ursula Hauser-Rethaller (ursula.hauser-rethaller@fma.gv.at)				
person(s)/mailbox at notifying authority	Lucas Grafl ( <u>lucas.grafl@fma.gv.at</u> ).				
8.2 Any other relevant information	-				
8.3 Date of the notification	-				
	21/11/2023				