



## Notification template for Article 131 CRD – Other Systemically Important Institutions (O-SII)

1. Notifying national authority																																		
<b>1.1 Name of the notifying authority</b>	<b>If several designated authorities, please mention all of them.</b> Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht - BaFin)																																	
2. Description of the measure																																		
<b>2.1 Concerned institution or group of institutions</b>	<b>On which institution is the measure applied (name and LEI code)?</b>																																	
	<table border="1"> <thead> <tr> <th>O-SII Institution</th> <th>LEI-Code</th> </tr> </thead> <tbody> <tr><td>1. Deutsche Bank AG</td><td>7LTWFZYICNSX8D621K86</td></tr> <tr><td>2. Commerzbank AG</td><td>851WYG NLUQLFZBSYGB56</td></tr> <tr><td>3. Unicredit Bank AG</td><td>2ZCNRR8UK83OBTEK2170</td></tr> <tr><td>4. DZ Bank AG, Zentral-Genossenschaftsbank</td><td>529900HNOAA1KXQJUQ27</td></tr> <tr><td>5. Landesbank Baden-Württemberg</td><td>B81CK4ESI35472RHJ606</td></tr> <tr><td>6. Landesbank Hessen-Thüringen Girozentrale</td><td>DIZES5CFO5K315R58746</td></tr> <tr><td>7. Bayerische Landesbank</td><td>VDYMYTQGZZ6DU0912C88</td></tr> <tr><td>8. Norddeutsche Landesbank Girozentrale</td><td>DSNHHQ2B9X5N6OUJ1236</td></tr> <tr><td>9. DekaBank Deutsche Girozentrale</td><td>0W2PZJM8XOY22M4GG883</td></tr> <tr><td>10. Volkswagen Financial Services AG</td><td>529900USFSZYPS075O24</td></tr> <tr><td>11. HSH Nordbank AG</td><td>TUKDD90GPC79G1KOE162</td></tr> <tr><td>12. WGZ Bank AG Westdeutsche Genossenschafts-Zentralbank</td><td>EFHQAFG69S4HKHLIZA14</td></tr> <tr><td>13. NRW.Bank</td><td>52990002O5KK6XOGJ020</td></tr> <tr><td>14. ING DiBa AG</td><td>3KXUNHVVQFIJN6RHL076</td></tr> <tr><td>15. Landwirtschaftliche Rentenbank<sup>1</sup></td><td>529900Z3J0N6S0F7CT25</td></tr> <tr><td>16. Landesbank Berlin Holding AG<sup>1</sup></td><td>529900RI32IU7J7VF635</td></tr> </tbody> </table> <p>The buffer is set on the highest level of consolidation.</p>	O-SII Institution	LEI-Code	1. Deutsche Bank AG	7LTWFZYICNSX8D621K86	2. Commerzbank AG	851WYG NLUQLFZBSYGB56	3. Unicredit Bank AG	2ZCNRR8UK83OBTEK2170	4. DZ Bank AG, Zentral-Genossenschaftsbank	529900HNOAA1KXQJUQ27	5. Landesbank Baden-Württemberg	B81CK4ESI35472RHJ606	6. Landesbank Hessen-Thüringen Girozentrale	DIZES5CFO5K315R58746	7. Bayerische Landesbank	VDYMYTQGZZ6DU0912C88	8. Norddeutsche Landesbank Girozentrale	DSNHHQ2B9X5N6OUJ1236	9. DekaBank Deutsche Girozentrale	0W2PZJM8XOY22M4GG883	10. Volkswagen Financial Services AG	529900USFSZYPS075O24	11. HSH Nordbank AG	TUKDD90GPC79G1KOE162	12. WGZ Bank AG Westdeutsche Genossenschafts-Zentralbank	EFHQAFG69S4HKHLIZA14	13. NRW.Bank	52990002O5KK6XOGJ020	14. ING DiBa AG	3KXUNHVVQFIJN6RHL076	15. Landwirtschaftliche Rentenbank <sup>1</sup>	529900Z3J0N6S0F7CT25	16. Landesbank Berlin Holding AG <sup>1</sup>
O-SII Institution	LEI-Code																																	
1. Deutsche Bank AG	7LTWFZYICNSX8D621K86																																	
2. Commerzbank AG	851WYG NLUQLFZBSYGB56																																	
3. Unicredit Bank AG	2ZCNRR8UK83OBTEK2170																																	
4. DZ Bank AG, Zentral-Genossenschaftsbank	529900HNOAA1KXQJUQ27																																	
5. Landesbank Baden-Württemberg	B81CK4ESI35472RHJ606																																	
6. Landesbank Hessen-Thüringen Girozentrale	DIZES5CFO5K315R58746																																	
7. Bayerische Landesbank	VDYMYTQGZZ6DU0912C88																																	
8. Norddeutsche Landesbank Girozentrale	DSNHHQ2B9X5N6OUJ1236																																	
9. DekaBank Deutsche Girozentrale	0W2PZJM8XOY22M4GG883																																	
10. Volkswagen Financial Services AG	529900USFSZYPS075O24																																	
11. HSH Nordbank AG	TUKDD90GPC79G1KOE162																																	
12. WGZ Bank AG Westdeutsche Genossenschafts-Zentralbank	EFHQAFG69S4HKHLIZA14																																	
13. NRW.Bank	52990002O5KK6XOGJ020																																	
14. ING DiBa AG	3KXUNHVVQFIJN6RHL076																																	
15. Landwirtschaftliche Rentenbank <sup>1</sup>	529900Z3J0N6S0F7CT25																																	
16. Landesbank Berlin Holding AG <sup>1</sup>	529900RI32IU7J7VF635																																	
<b>2.2 Level of the buffer applied</b>	<b>What is the level of the buffer (in %) applied to the institution?</b>																																	
	<table border="1"> <thead> <tr> <th>O-SII Institution</th> <th>From 1 Jan 2019</th> </tr> </thead> <tbody> <tr><td>1. Deutsche Bank AG</td><td>2.00%</td></tr> <tr><td>2. Commerzbank AG</td><td>1.50%</td></tr> <tr><td>3. Unicredit Bank AG</td><td>1.00%</td></tr> <tr><td>4. DZ Bank AG, Zentral-Genossenschaftsbank</td><td>1.00%</td></tr> <tr><td>5. Landesbank Baden-Württemberg</td><td>1.00%</td></tr> <tr><td>6. Landesbank Hessen-Thüringen Girozentrale</td><td>1.00%</td></tr> <tr><td>7. Bayerische Landesbank</td><td>1.00%</td></tr> <tr><td>8. Norddeutsche Landesbank Girozentrale</td><td>1.00%</td></tr> <tr><td>9. DekaBank Deutsche Girozentrale</td><td>0.50%</td></tr> </tbody> </table>	O-SII Institution	From 1 Jan 2019	1. Deutsche Bank AG	2.00%	2. Commerzbank AG	1.50%	3. Unicredit Bank AG	1.00%	4. DZ Bank AG, Zentral-Genossenschaftsbank	1.00%	5. Landesbank Baden-Württemberg	1.00%	6. Landesbank Hessen-Thüringen Girozentrale	1.00%	7. Bayerische Landesbank	1.00%	8. Norddeutsche Landesbank Girozentrale	1.00%	9. DekaBank Deutsche Girozentrale	0.50%													
O-SII Institution	From 1 Jan 2019																																	
1. Deutsche Bank AG	2.00%																																	
2. Commerzbank AG	1.50%																																	
3. Unicredit Bank AG	1.00%																																	
4. DZ Bank AG, Zentral-Genossenschaftsbank	1.00%																																	
5. Landesbank Baden-Württemberg	1.00%																																	
6. Landesbank Hessen-Thüringen Girozentrale	1.00%																																	
7. Bayerische Landesbank	1.00%																																	
8. Norddeutsche Landesbank Girozentrale	1.00%																																	
9. DekaBank Deutsche Girozentrale	0.50%																																	

<sup>1</sup> Pending administrative procedure.

	<table border="1"> <tr><td>10. Volkswagen Financial Services AG</td><td>0.50%</td></tr> <tr><td>11. HSH Nordbank AG</td><td>0.50%</td></tr> <tr><td>12. WGZ Bank AG Westdeutsche Genossenschafts-Zentralbank</td><td>0.50%</td></tr> <tr><td>13. NRW.Bank</td><td>0.50%</td></tr> <tr><td>14. ING DiBa AG</td><td>0.50%</td></tr> <tr><td>15. Landwirtschaftliche Rentenbank<sup>1</sup></td><td>0.50%</td></tr> <tr><td>16. Landesbank Berlin Holding AG<sup>1</sup></td><td>0.50%</td></tr> </table>	10. Volkswagen Financial Services AG	0.50%	11. HSH Nordbank AG	0.50%	12. WGZ Bank AG Westdeutsche Genossenschafts-Zentralbank	0.50%	13. NRW.Bank	0.50%	14. ING DiBa AG	0.50%	15. Landwirtschaftliche Rentenbank <sup>1</sup>	0.50%	16. Landesbank Berlin Holding AG <sup>1</sup>	0.50%	
10. Volkswagen Financial Services AG	0.50%															
11. HSH Nordbank AG	0.50%															
12. WGZ Bank AG Westdeutsche Genossenschafts-Zentralbank	0.50%															
13. NRW.Bank	0.50%															
14. ING DiBa AG	0.50%															
15. Landwirtschaftliche Rentenbank <sup>1</sup>	0.50%															
16. Landesbank Berlin Holding AG <sup>1</sup>	0.50%															
<b>2.3 Name of the parent company</b>	<p><b>If the institution is a subsidiary, what is the name and LEI code of the parent company?</b></p> <table border="1"> <thead> <tr> <th>O-SII Institution</th> <th>Parent Company</th> <th>LEI-Code (parent company)</th> </tr> </thead> <tbody> <tr> <td>UniCredit Bank AG</td> <td>Unicredit S.p.A.</td> <td>549300TRUWO2CD2G5692</td> </tr> <tr> <td>ING-Diba AG</td> <td>ING Groep N.V</td> <td>549300NYKK9MWM7GGW15</td> </tr> </tbody> </table>	O-SII Institution	Parent Company	LEI-Code (parent company)	UniCredit Bank AG	Unicredit S.p.A.	549300TRUWO2CD2G5692	ING-Diba AG	ING Groep N.V	549300NYKK9MWM7GGW15						
O-SII Institution	Parent Company	LEI-Code (parent company)														
UniCredit Bank AG	Unicredit S.p.A.	549300TRUWO2CD2G5692														
ING-Diba AG	ING Groep N.V	549300NYKK9MWM7GGW15														
<b>2.4 Names of subsidiaries</b>	<p><b>If the institution is a parent institution and the buffer is applied on a (sub)consolidated level:</b></p> <p>a. <b>Please name the subsidiaries of the institution</b> → please see the list in the Annex 1 to the notification template</p> <p>b. <b>Are subsidiaries notified as O-SIIs (please give name and LEI code)?</b></p> <table border="1"> <thead> <tr> <th>O-SII Institution (subsidiary)</th> <th>LEI-Code (subsidiary)</th> <th>Parent Company</th> </tr> </thead> <tbody> <tr> <td>UniCredit Bank AG</td> <td>2ZCNRR8UK83OBTEK2170</td> <td>Unicredit S.p.A.</td> </tr> <tr> <td>ING-Diba AG</td> <td>3KXUNHVVQFIJN6RHLO76</td> <td>ING Groep N.V</td> </tr> </tbody> </table>	O-SII Institution (subsidiary)	LEI-Code (subsidiary)	Parent Company	UniCredit Bank AG	2ZCNRR8UK83OBTEK2170	Unicredit S.p.A.	ING-Diba AG	3KXUNHVVQFIJN6RHLO76	ING Groep N.V						
O-SII Institution (subsidiary)	LEI-Code (subsidiary)	Parent Company														
UniCredit Bank AG	2ZCNRR8UK83OBTEK2170	Unicredit S.p.A.														
ING-Diba AG	3KXUNHVVQFIJN6RHLO76	ING Groep N.V														
<b>3. Timing of the measure</b>																
<b>3.1 Timing of the Decision</b>	<p><b>What is the date of the official decision? For SSM countries when notifying the ECB: provide the date when the decision referred to in Article 5 of the SSMR shall be taken.</b></p> <p>→ 30th December 2015</p>															
<b>3.2 Timing of the Publication</b>	<p><b>What is the date of publication of the notified measure?</b></p> <p>→ First quarter of 2016</p>															
<b>3.3 Disclosure</b>	<p><b>Information about the communication strategy of the notified measure to the market.</b></p> <p>→ The designated institutions and their respective O-SII capital buffer requirements will be published on the internet webpage of the BaFin after the institutions will have been informed.</p>															
<b>3.4 Timing of Application</b>	<p><b>What is the intended date of activation (i.e. as of which date shall the measure be applicable)?</b></p> <p>→ 1st January 2017</p>															
<b>3.5 Phasing in</b>	<p><b>What is the intended timeline for the phase-in of the measure?</b></p> <table border="1"> <thead> <tr> <th rowspan="3">Institution</th> <th colspan="3">O-SII buffer requirements per institution during <i>phase-in</i> period</th> </tr> <tr> <th>From 1 Jan 2017</th> <th>From 1 Jan 2018</th> <th>From 1 Jan 2019</th> </tr> </thead> <tbody> <tr> <td>1. Deutsche Bank AG</td> <td>0.66%</td> <td>1.32%</td> <td>2.00%</td> </tr> <tr> <td>2. Commerzbank AG</td> <td>0.50%</td> <td>1.00%</td> <td>1.50%</td> </tr> </tbody> </table>	Institution	O-SII buffer requirements per institution during <i>phase-in</i> period			From 1 Jan 2017	From 1 Jan 2018	From 1 Jan 2019	1. Deutsche Bank AG	0.66%	1.32%	2.00%	2. Commerzbank AG	0.50%	1.00%	1.50%
Institution	O-SII buffer requirements per institution during <i>phase-in</i> period															
	From 1 Jan 2017		From 1 Jan 2018	From 1 Jan 2019												
	1. Deutsche Bank AG	0.66%	1.32%	2.00%												
2. Commerzbank AG	0.50%	1.00%	1.50%													

	<table border="1"> <tbody> <tr> <td>3. Unicredit Bank AG</td> <td>0.33%</td> <td>0.66%</td> <td>1.00%</td> </tr> <tr> <td>4. DZ Bank AG, Zentral-Genossenschaftsbank</td> <td>0.33%</td> <td>0.66%</td> <td>1.00%</td> </tr> <tr> <td>5. Landesbank Baden-Württemberg</td> <td>0.33%</td> <td>0.66%</td> <td>1.00%</td> </tr> <tr> <td>6. Landesbank Hessen-Thüringen Girozentrale</td> <td>0.33%</td> <td>0.66%</td> <td>1.00%</td> </tr> <tr> <td>7. Bayerische Landesbank</td> <td>0.33%</td> <td>0.66%</td> <td>1.00%</td> </tr> <tr> <td>8. Norddeutsche Landesbank Girozentrale</td> <td>0.33%</td> <td>0.66%</td> <td>1.00%</td> </tr> <tr> <td>9. DekaBank Deutsche Girozentrale</td> <td>0.16%</td> <td>0.32%</td> <td>0.50%</td> </tr> <tr> <td>10. Volkswagen Financial Services AG</td> <td>0.16%</td> <td>0.32%</td> <td>0.50%</td> </tr> <tr> <td>11. HSH Nordbank AG</td> <td>0.16%</td> <td>0.32%</td> <td>0.50%</td> </tr> <tr> <td>12. WGZ Bank AG Westdeutsche Genossenschafts-Zentralbank</td> <td>0.16%</td> <td>0.32%</td> <td>0.50%</td> </tr> <tr> <td>13. NRW.Bank</td> <td>0.16%</td> <td>0.32%</td> <td>0.50%</td> </tr> <tr> <td>14. ING DiBa AG</td> <td>0.16%</td> <td>0.32%</td> <td>0.50%</td> </tr> <tr> <td>15. Landwirtschaftliche Rentenbank<sup>1</sup></td> <td>0.16%</td> <td>0.32%</td> <td>0.50%</td> </tr> <tr> <td>16. Landesbank Berlin Holding AG<sup>1</sup></td> <td>0.16%</td> <td>0.32%</td> <td>0.50%</td> </tr> </tbody> </table>	3. Unicredit Bank AG	0.33%	0.66%	1.00%	4. DZ Bank AG, Zentral-Genossenschaftsbank	0.33%	0.66%	1.00%	5. Landesbank Baden-Württemberg	0.33%	0.66%	1.00%	6. Landesbank Hessen-Thüringen Girozentrale	0.33%	0.66%	1.00%	7. Bayerische Landesbank	0.33%	0.66%	1.00%	8. Norddeutsche Landesbank Girozentrale	0.33%	0.66%	1.00%	9. DekaBank Deutsche Girozentrale	0.16%	0.32%	0.50%	10. Volkswagen Financial Services AG	0.16%	0.32%	0.50%	11. HSH Nordbank AG	0.16%	0.32%	0.50%	12. WGZ Bank AG Westdeutsche Genossenschafts-Zentralbank	0.16%	0.32%	0.50%	13. NRW.Bank	0.16%	0.32%	0.50%	14. ING DiBa AG	0.16%	0.32%	0.50%	15. Landwirtschaftliche Rentenbank <sup>1</sup>	0.16%	0.32%	0.50%	16. Landesbank Berlin Holding AG <sup>1</sup>	0.16%	0.32%	0.50%
3. Unicredit Bank AG	0.33%	0.66%	1.00%																																																						
4. DZ Bank AG, Zentral-Genossenschaftsbank	0.33%	0.66%	1.00%																																																						
5. Landesbank Baden-Württemberg	0.33%	0.66%	1.00%																																																						
6. Landesbank Hessen-Thüringen Girozentrale	0.33%	0.66%	1.00%																																																						
7. Bayerische Landesbank	0.33%	0.66%	1.00%																																																						
8. Norddeutsche Landesbank Girozentrale	0.33%	0.66%	1.00%																																																						
9. DekaBank Deutsche Girozentrale	0.16%	0.32%	0.50%																																																						
10. Volkswagen Financial Services AG	0.16%	0.32%	0.50%																																																						
11. HSH Nordbank AG	0.16%	0.32%	0.50%																																																						
12. WGZ Bank AG Westdeutsche Genossenschafts-Zentralbank	0.16%	0.32%	0.50%																																																						
13. NRW.Bank	0.16%	0.32%	0.50%																																																						
14. ING DiBa AG	0.16%	0.32%	0.50%																																																						
15. Landwirtschaftliche Rentenbank <sup>1</sup>	0.16%	0.32%	0.50%																																																						
16. Landesbank Berlin Holding AG <sup>1</sup>	0.16%	0.32%	0.50%																																																						
<b>3.6 Review of the measure</b>	<p><b>When will the measure be reviewed (Article 131(6) and 131(12) specify that the buffer, the identification of O-SIIs and the allocation into subcategories must be reviewed at least annually)?</b></p> <p>→ The necessity and level of O-SII buffers will be reviewed annually. (Section 10g (3) of the German Banking Act; Article 131(6) of the CRD IV).</p>																																																								
<b>4. Reason for activation of the O-SII buffer</b>																																																									
<b>4.1 Scores of concerned institution or group of institutions, as per EBA guidelines on the assessment of O-SIIs</b>	<p><b>Please list here the name, scores and category scores of the identified O-SII related to</b></p> <ul style="list-style-type: none"> <li><b>a. size;</b></li> <li><b>b. importance for the economy of the relevant Member State or the Union, capturing substitutability/financial institution infrastructure;</b></li> <li><b>c. complexity, including the additional complexities from cross-border activity;</b></li> <li><b>d. interconnectedness of the institution or (sub-)group with the financial system.</b></li> </ul> <p>→ In step 1 of the identification process (EBA/GL/2014/10, Title II) automatically identified O-SIIs (score ≥ 350 bps):</p> <table border="1"> <thead> <tr> <th>Institution</th> <th>Size</th> <th>Importance</th> <th>Complexity</th> <th>Interconnectedness</th> </tr> </thead> <tbody> <tr> <td>1. Deutsche Bank AG</td> <td>535.3</td> <td>546.8</td> <td>1.351.4</td> <td>341.3</td> </tr> <tr> <td>2. Commerzbank AG</td> <td>180.2</td> <td>202.9</td> <td>270.9</td> <td>191.4</td> </tr> <tr> <td>3. UniCredit Bank AG</td> <td>96.2</td> <td>114.6</td> <td>165.3</td> <td>178.3</td> </tr> <tr> <td>4. DZ BANK AG, Zentral-Genossenschaftsbank</td> <td>103.9</td> <td>167.2</td> <td>78.7</td> <td>78.7</td> </tr> <tr> <td>5. Landesbank Baden-Württemberg</td> <td>84.4</td> <td>134.8</td> <td>79.5</td> <td>59.4</td> </tr> </tbody> </table>	Institution	Size	Importance	Complexity	Interconnectedness	1. Deutsche Bank AG	535.3	546.8	1.351.4	341.3	2. Commerzbank AG	180.2	202.9	270.9	191.4	3. UniCredit Bank AG	96.2	114.6	165.3	178.3	4. DZ BANK AG, Zentral-Genossenschaftsbank	103.9	167.2	78.7	78.7	5. Landesbank Baden-Württemberg	84.4	134.8	79.5	59.4																										
Institution	Size	Importance	Complexity	Interconnectedness																																																					
1. Deutsche Bank AG	535.3	546.8	1.351.4	341.3																																																					
2. Commerzbank AG	180.2	202.9	270.9	191.4																																																					
3. UniCredit Bank AG	96.2	114.6	165.3	178.3																																																					
4. DZ BANK AG, Zentral-Genossenschaftsbank	103.9	167.2	78.7	78.7																																																					
5. Landesbank Baden-Württemberg	84.4	134.8	79.5	59.4																																																					

→ In step 2 of the identification process (EBA/GL/2014/10, Title III: Supervisory Assessment) identified O-SIIs (score ≥ 100 bps and/or expert judgment):

Institution	Size	Importance	Complexity	Interconnectedness
1. Deutsche Bank AG	555.6	543.8	1.219.0	534.2
2. Commerzbank AG	205.0	201.8	245.5	310.2
3. Unicredit Bank AG	113.7	115.5	149.4	161.1
4. DZ Bank AG, Zentral-Genossenschaftsbank	106.8	143.8	87.5	98.8
5. Landesbank Baden-Württemberg	91.0	127.7	81.9	55.9
6. Landesbank Hessen-Thüringen Girozentrale	58.7	111.3	39.9	121.1
7. Bayerische Landesbank	82.2	106.1	49.6	67.7
8. Norddeutsche Landesbank Girozentrale	64.5	103.1	37.1	29.6
9. DekaBank Deutsche Girozentrale	34.7	78.6	37.2	2.2
10. Volkswagen Financial Services AG	34.5	22.6	69.7	17.9
11. HSH Nordbank AG	36.0	54.8	31.5	11.4
12. WGZ Bank AG Westdeutsche Genossenschafts-Zentralbank	29.0	53.1	12.6	25.4
13. NRW.Bank	46.3	65.8	2.2	4.5
14. ING DiBa AG	40.6	10.3	9.0	56.2
15. Landwirtschaftliche Rentenbank <sup>1</sup>	25.5	64.1	12.6	0.0
16. Landesbank Berlin Holding AG <sup>1</sup>	27.3	37.3	11.0	23.9

**Please provide relevant information (methodology, calculations and formulas, data sources, information set used for denominators) in a separate Excel file.**

An outline of the applied method for the identification of O-SIIs can be found in Annex 2 to the notification template.

**4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)**

**Please provide information on:**

**a. whether you followed the EBA guidelines on the assessment of O-SIIs**

→ The identification of the O-SIIs is based on EBA/GL/2014/10.

**b. which threshold score has been set to identify O-SIIs**

Scores in step 1 of the identification process (EBA/GL/2014/10 Title II "Scoring methodology for the assessment of the O-SIIs"): All institutions which receive a score of ≥ 350bps in the calculation according to EBA/GL/2014/10 Title II were automatically identified as an O-SII.

Scores in step 2 of the identification process (EBA/GL/2014/10 Title III "Supervisory Assessment of O-SIIs"): All institutions which received a score of ≥ 100bps in the calculation according to EBA/GL/2014/10 Title III were additionally identified as an O-SII. This calculation was corroborated by an expert judgment.

**c. which overall score is attributed to the O-SII**

→ In step 1 of the identification process (EBA/GL/2014/10, Title II) automatically identified O-SIIs (score ≥ 350 bps):

Institution	Score [bps] Step 1
1. Deutsche Bank AG	2774.8
2. Commerzbank AG	845.3
3. Unicredit Bank AG	554.4
4. DZ Bank AG, Zentral-Genossenschaftsbank	428.6

5. Landesbank Baden-Württemberg 358.0

→ In step 2 of the identification process (EBA/GL/2014/10, Title III: Supervisory Assessment) identified O-SIIs (score ≥ 100 bps and/or expert judgment):

<b>Institutions</b>	<b>Score [bps] Step 2</b>
1. Deutsche Bank AG	2852.6
2. Commerzbank AG	962.5
3. Unicredit Bank AG	539.8
4. DZ Bank AG, Zentral- Genossenschaftsbank	436.8
5. Landesbank Baden-Württemberg	356.5
6. Landesbank Hessen-Thüringen Girozentrale	331.0
7. Bayerische Landesbank	305.6
8. Norddeutsche Landesbank Girozentrale	234.3
9. DekaBank Deutsche Girozentrale	152.7
10. Volkswagen Financial Services AG	144.6
11. HSH Nordbank AG	133.6
12. WGZ Bank AG Westdeutsche Genossenschafts-Zentralbank	120.1
13. NRW.Bank	118.8
14. ING DiBa AG	116.1
15. Landwirtschaftliche Rentenbank <sup>1</sup>	102.3
16. Landesbank Berlin Holding AG <sup>1</sup>	99.6

Landesbank Berlin Holding (LBB) has scored a total of just under 100 bps (99.6 bps), but was nevertheless identified as an O-SII on the basis of the qualitative expert judgement. The key factors in this decision were the fact that, in comparison with other institutions identified as O-SIIs, LBB has a relatively high share of customer deposits (private sector deposits from Germany in relation to the GDP: 0.7%, 11th place among all institutions assessed) and that it is in the 14th place among all institutions assessed in terms of total assets in relation to the GDP (3.3%), and with regard to lending in Germany in relation to the GDP (1.0%). Additionally, in terms of total lending in the real estate sector, LBB is, at 5.2%, second only to Bayerische Landesbank (9.7%) among all institutions assessed and is in the 13th place among all institutions assessed in the Banking System Loss analysis (ahead of HSH Nordbank AG, Landwirtschaftliche Rentenbank, Volkswagen Financial Services AG and ING-DiBa AG).

**d. which of the optional indicators have been used to justify supervisory assessment decisions, if any, and what are the scores**

→ for an overview of the indicators used please see Annex 2 to the notification template and the explanation under letter c).

**e. why these optional indicators are relevant for the Member State**

→ see Annex 2 to the notification template.

**f. why the bank is systemically important in terms of those particular optional indicators**

→ see the explanation under letter c)

**g. whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process**

→ The assessment covers the population of all institutions in Germany.

**h. names and scores of all relevant entities not excluded from the identification process (could be sent in a separate excel file)**

→ see Annex 3 to the notification template

	<p><b>i. whether non-bank institutions have been included in the calculations</b>  → The assessment contains only credit institutions.</p>
<b>4.3 Supervisory judgement</b>	<p><b>Has the institution listed in 2.1 been identified through supervisory judgement as laid down in EBA guidelines on the assessment of O-SIIs?</b>  → 11 institutions were identified through supervisory judgement.</p> <p><b>If yes, please provide an outline of the methodology used for the supervisory assessment and specify which institutions have been identified through it.</b></p> <p>→ In step 2 – the supervisory assessment under Title III of EBA/GL/2014/10 – national particularities of the German banking sector are taken into account. In order to designate further O-SIIs, a quantitative analysis is carried out using the scoring model of Step 1, complemented by optional indicators from Annex 2 of EBA/GL/2014/10. All institutions with a score equal to or higher than 100 bps achieved on the basis of the nationally expanded scoring model are also designated as O-SIIs. The quantitative analysis is complemented by an expert judgement.</p> <p>The expert judgement comprises three stages:</p> <p>In the first stage of the expert judgement, three traditional key indicators for banks (total assets, private sector deposits, private sector loans) are examined more closely and assessed in relation to the German gross domestic product.</p> <p>In the second stage of the expert judgement, the 25 institutions with the highest scores in step 2 are evaluated with respect to their lending to significant sectors of the economy, such as construction, energy or manufacturing.</p> <p>In order to test the plausibility of the results from the preceding analyses, the third stage of the expert judgement uses a model-based analysis, in addition to the previous results, to determine the potential systemic loss that could be generated by the failure of an individual bank (Banking System Loss Analysis).</p>
<b>4.4 Calibrating the O-SII buffer</b>	<p><b>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.</b></p> <p>→ The identified institutions are allocated to one of the four capital buffer categories: 0.5%, 1.0%, 1.5%, and 2.0% [CET1 per total risk exposure] using a cluster analysis. For more information please see Annex 2 to the notification template.</p>
<b>4.5 Effectiveness and proportionality of measure</b>	<p><b>Please provide a justification for why the O-SII buffer is considered likely to be effective and proportionate to mitigate the risk.</b></p> <p>→ As a rule, capital add-ons increase the institutions' total loss-absorbing capacity and so constitute an appropriate measure to strengthen the resilience of the institutions and the financial system as a whole. In addition, capital add-ons rectify inappropriate incentives by introducing negative external effects to the decision-making process of systemically important institutions (e.g. profit maximising while neglecting the costs for the economy in the case of a default) and by withdrawing the implicit state guarantee (reduction of moral hazard).</p>
<b>5. Combinations and interactions with other measures</b>	
<b>5.1 Assessment of cross-border effects and the likely impact on the internal market (Recommendation ESRB/2015/2)</b>	<p><b>Assessment of the cross-border effects of the implementation of the draft measure.</b></p> <p><b>a. Assessment of the spillover channels operating via risk adjustment and regulatory arbitrage. The relevant indicators provided in Chapter 11 of the ESRB Handbook on Operationalising Macro-prudential Policy in the Banking Sector<sup>2</sup> can be used.</b></p> <p><b>b. Assessment of:</b></p>

<sup>2</sup> Available on the ESRB's website at [www.esrb.europa.eu](http://www.esrb.europa.eu).

	<ul style="list-style-type: none"> <li>○ cross-border effects (leakages and regulatory arbitrage) of the implementation of the measure in your own jurisdiction (inward spillovers); and</li> <li>○ cross-border effects on other Member States and on the Single Market of the measure (outward spillovers).</li> </ul> <p>→ Not applicable.</p>																				
<b>5.2 Assessment of leakages and regulatory arbitrage within the notifying Member State</b>	<p>Referring to your country's specific characteristics, what is the scope for "leakages and regulatory arbitrage" in your own jurisdiction (i.e., circumvention of the measure/leakages to other parts of the financial sector)?</p> <p>→ Leakages or regulatory arbitrage are not expected.</p>																				
<b>6. Combinations and interactions with other measures</b>																					
<b>6.1 Combinations between G-SII and OSII buffers (Article 131.14)</b>	<p><b>In case both G-SII and O-SII criteria applied to the same institution at the consolidated level, which of the two buffers is the highest?</b></p> <p>→ Only the Deutsche Bank AG has to hold a G-SII capital buffer. For a comparison, the G-SII and the O-SII capital buffer are presented in the following table according to the respective phase-in regulations:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="5" style="text-align: center;"><b>G-SII and O-SII buffer requirements of the Deutsche Bank AG during <i>phase-in</i> period</b></th> </tr> <tr> <th></th> <th style="text-align: center;"><b>From 1 Jan 2016</b></th> <th style="text-align: center;"><b>From 1 Jan 2017</b></th> <th style="text-align: center;"><b>From 1 Jan 2018</b></th> <th style="text-align: center;"><b>From 1 Jan 2019</b></th> </tr> </thead> <tbody> <tr> <td>O-SII buffer</td> <td style="text-align: center;">-</td> <td style="text-align: center;">0.66%</td> <td style="text-align: center;">1.32%</td> <td style="text-align: center;">2.00%</td> </tr> <tr> <td>G-SII buffer</td> <td style="text-align: center;">0.50%</td> <td style="text-align: center;">1.00%</td> <td style="text-align: center;">1.50%</td> <td style="text-align: center;">2.00%</td> </tr> </tbody> </table>	<b>G-SII and O-SII buffer requirements of the Deutsche Bank AG during <i>phase-in</i> period</b>						<b>From 1 Jan 2016</b>	<b>From 1 Jan 2017</b>	<b>From 1 Jan 2018</b>	<b>From 1 Jan 2019</b>	O-SII buffer	-	0.66%	1.32%	2.00%	G-SII buffer	0.50%	1.00%	1.50%	2.00%
<b>G-SII and O-SII buffer requirements of the Deutsche Bank AG during <i>phase-in</i> period</b>																					
	<b>From 1 Jan 2016</b>	<b>From 1 Jan 2017</b>	<b>From 1 Jan 2018</b>	<b>From 1 Jan 2019</b>																	
O-SII buffer	-	0.66%	1.32%	2.00%																	
G-SII buffer	0.50%	1.00%	1.50%	2.00%																	
<b>6.2 Combinations with SRB buffers (Article 131.14 + Article 133.5)</b>	<p><b>Is the institution subject to a systemic risk buffer?</b></p> <p>→ No</p> <p><b>If yes, please provide the following information:</b></p> <ol style="list-style-type: none"> <li>a. What is the level of the systemic risk buffer (in %) applied to the concerned institution</li> <li>b. Is the systemic risk buffer applied to all exposures located in your Member State only?</li> </ol> <p>→ Not applicable.</p>																				
<b>6.3 Combined buffer requirement (Article 131.16 and Article 131.17)</b>	<ol style="list-style-type: none"> <li>a. Does the combined buffer requirement apply to the institution? → No.</li> <li>b. Is the combined buffer requirement above the sum of the buffers described in Article 131-16 and Article 131-17? → No.</li> </ol>																				
<b>6.4 O-SII requirement for a subsidiary (Article 131.8)</b>	<p><b>In case the O-SII is a subsidiary of an EU parent institution which is subject to a G-SII or O-SII buffer on a consolidated basis, what is the G-SII and O-SII buffer rate on a consolidated basis?</b></p>																				

	<b>Institution</b>	<b>Parent</b>	<b>G-SII buffer parent</b>	<b>O-SII buffer parent</b>
	UniCredit Bank AG	Unicredit Group	1.0%	unknown
	ING-DiBa AG	ING Bank N.V.	1.0%	2.0%  (phase-in from 1 Jan 2016 until 1 Jan 2019)
<b>6.5 Interaction with other measures</b>	<p><b>How does the buffer requirement interact with other measures addressing the same risk (e.g. with other supervisory measures)?</b></p> <p>→ According to section 20 of the German Act on the Recovery and Resolution of Institutions and Financial Groups (Sanierungs- und Abwicklungsgesetz – SAG) O-SII are institutions posing a potential systemic risk (PSI). In order to ensure the stability of the financial system and to protect the wider economy, institutions identified as PSIs have to fulfil additional and/or stricter supervisory requirements in the following areas:</p> <ul style="list-style-type: none"> <li>▪ Recovery planning (sections 19 and 20 of the SAG)</li> <li>▪ Restrictions relating to other positions held by management board members (section 25c (2) sentence 2 of the KWG)</li> <li>▪ Restrictions relating to other positions held by members of the administrative and supervisory bodies (section 25d (3) of the KWG)</li> <li>▪ Specific requirements for remuneration systems, in particular relating to classification as a "major institution" (section 17 of the German Ordinance on the Supervisory Requirements for Institutions' Remuneration Systems (Institutsvergütungsverordnung – InstitutsVergV))</li> <li>▪ Increased reporting frequency with respect to risk-bearing capacity information (section 12 of the German Ordinance on the Submission of Financial and Risk-Bearing Capacity Information under the German Banking Act (Verordnung zur Einreichung von Finanz- und Risikotragfähigkeitsinformationen nach dem Kreditwesengesetz – FinaRisikoV))</li> </ul> <p>In addition, further requirements apply to PSIs that are also O-SIIs:</p> <p>Risk data aggregation capabilities and risk reporting practices of O-SIIs - Principles for effective risk data aggregation and risk reporting (BCBS 239)</p>			
<b>7. Miscellaneous</b>				
<b>7.1 Contact person(s) at notifying authority</b>	<b>Contact person(s) for further inquiries (name, phone number and e-mail address)</b>			
	Functional e-mail address: GSII-OSII@bafin.de			
<b>7.2 Any other relevant information</b>	-			