

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) Regulation¹);
- [DARWIN/ASTRA](#) 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	Czech National Bank		
1.2 Country of the notifying authority	Czech Republic		
2. Description of the measure			
2.1a Institution or group of institutions concerned	Name of institution	LEI	Consolidation level
	Československá obchodní banka, a.s.	Q5BP2UEQ48R75BOTCB92	The highest level of consolidation
	Komerční banka, a.s.	IYKCAVNFR8QGF00HV840	The highest level of consolidation
	Česká spořitelna, a.s.	9KOGW2C2FCIOJQ7FF485	The highest level of consolidation
	UniCredit Bank CZ and SK, a.s.	KR6LSKV3BTSJRD41IF75	The highest level of consolidation
	Raiffeisenbank, a.s.	3157001000000004460	The highest level of consolidation
	PPF Financial Holdings a.s.	31570014BNQ1Q99CNQ35	A sub-consolidated level
	J&T FINANCE GROUP SE	315700E9POA724IWF59	The highest level of consolidation

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.

2.1b Changes to the list of institutions concerned	Extending the list to include J&T FINANCE GROUP SE		
2.2 Level of the buffer applied	Institutions are subject to a buffer on an individual and/or (sub)consolidated level.		
	Name of institution	New O-SII buffer	Previous O-SII buffer
	Československá obchodní banka, a.s.	2.5 %	2.5 %
	Komerční banka, a.s.	2 %	2 %
	Česká spořitelna, a.s.	2.5 %	2 %
	UniCredit Bank CZ and SK, a.s.	1.5 %	1.5 %
	Raiffeisenbank, a.s.	0.5 %	0.5 %
	PPF Financial Holdings a.s.	0.5 %	0.5 %
J&T FINANCE GROUP SE	0.5 %	-	
2.3 Name of the ultimate EU parent institution	Name of identified O-SII	Ultimate EU parent institution	LEI of ultimate parent institution
	Československá obchodní banka, a.s.	KBC Group NV	213800X3Q9LSAKRUWY91
	Komerční banka, a.s.	Société Générale SA	O2RNE8IBXP4R0TD8PU41
	Česká spořitelna, a.s.	Erste Group Bank AG	PQOH26KWDF7CG10L6792
	UniCredit Bank CZ and SK, a.s.	UniCredit S.p.A.	549300TRUWO2CD2G5692
	Raiffeisenbank, a.s.	Raiffeisen Bank International AG	9ZHRYM6F437SQJ6OUG95
	PPF Financial Holdings a.s.	PPF Group N.V.	31570030000000000550
	J&T FINANCE GROUP SE		
2.4 Names of subsidiaries	Name of parent O-SII identified	Name of O-SII subsidiary	LEI of O-SII subsidiary
	J&T FINANCE GROUP SE	365.bank, a. s. (Poštová banka, a.s.)	315700PLTAXHBHP5J02
		365.invest, správ. spol., a. s. (PRVÁ PENZIJNÁ SPRÁVCOVSKÁ SPOLOČNOSŤ POŠTOVEJ BANKY, správ. spol., a. s.)	31570020000000000274
		Ahoj, a.s.	
		AMISTA investiční společnost, a.s.	315700RNIL4B530DOV06
		ATLANTIK finanční trhy, a.s.	3157002EQLLEB7WM9A54
		Cards&Co, a. s.	
		DanubePay, a. s.	097900CAHU0000246689
		Equity Holding, a.s.	3157000NLIUKNREM2B66
		Fond Fondů NLS SICAV, a.s.	3157009UFA72HKUJUL18
		J&T Banka d.d. (VABA d.d. banka Varaždin)	529900B24VS047JP5859
		J&T BANKA, a.s.	31570010000000043842
		J&T Global Finance IX., s.r.o.	097900BII10000168791
		J&T Global Finance X., s.r.o.	3157005KE7ZCETP1WY41
		J&T Global Finance XI., s.r.o.	315700RTPOILGPZYNR48
		J&T Global Finance XII., s.r.o.	097900CAKA0000026456
		J&T Global Finance XIII., s.r.o.	3157008JQBUM9MHRAK26
		J&T Global Finance XIV., s.r.o.	097900CAKA0000095229
		J&T Global Finance XV., s.r.o.	315700Q2WHPS9UPDE850
		J&T Global Finance XVI., s.r.o.	984500D988O04E5C2491

		J&T Global Finance XVII., s.r.o.				
		J&T IB and Capital Markets, a.s.	315700K8OZOAC92RSC63			
		J&T INTEGRIS GROUP LIMITED				
		J&T INVESTIČNÁ SPOLOČNOSŤ, správ. spol., a.s.	097900CAKA0000038581			
		J&T INVESTIČNÍ SPOLEČNOST, a.s	31570010000000120666			
		J&T Leasingová společnost, a.s. (Health Care Financing, a.s., Environmental services, a.s.)	315700O51H78D3TY9T60			
		J&T Mezzanine, a.s.	315700A11TYBHVQR2562			
		J&T MINORITIES PORTFOLIO LIMITED (SONDERACO TRADING LIMITED)	315700PR7DEGGM193P15			
		J&T ORBIT SICAV, a.s.	315700HW5BMG8P4SV094			
		J&T RFI I. EUR, s.r.o.	097900BEHQ0000164324			
		J&T SERVICES ČR, a.s. (dříve J&T Management, a.s.)	315700PMPCCQ68U3O337			
		JTFG FUND I SICAV, a.s.	315700VV9YAVFSZGG836			
		PB Servis, a.s. (POBA Servis, a. s.)	097900CAHW0000246979			
		Rustonka Development II s.r.o.	984500UAA7C49FBE6386			
3. Timing for the measure						
3.1 Timing for the decision	29/11/2024					
3.2 Timing for publication	29/11/2024					
3.3 Disclosure	The O-SIIs list and the O-SII buffer rates are disclosed on the website of the Czech National Bank and at least in one Financial Stability Report of the year.					
3.4 Timing for application	01/07/2025					
3.5 Phasing in	No phase-in					
	Name of institution	Date1	Date2	Date3	Date4	Date5
		%	%	%	%	%
		%	%	%	%	%
3.6 Review of the measure	The next regular review should take place around H2 2025.					
4. Reason for O-SII identification and activation of the O-SII buffer						
4.1 Scores of institutions or group of institutions concerned, as per EBA guidelines on the assessment of O-SIIs (Article 131.3 CRD)	Name of institution	Size	Substitutability	Complexity	Interconnectedness	Overall Score
	Československá obchodní banka, a.s.	1955	2186	1944	2486	2143
	Komerční banka, a.s.	1473	1655	2520	1405	1763
	Česká spořitelna, a.s.	1973	1720	1267	1711	1668
	UniCredit Bank CZ and SK, a.s.	1002	1088	1125	1589	1201
	Raiffeisenbank, a.s.	791	864	570	564	697
	PPF Financial Holdings a.s.	606	290	601	499	499
	J&T FINANCE GROUP SE	454	288	581	570	473

<p>4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)</p>	<p>Please provide information on:</p> <ul style="list-style-type: none"> a. whether you followed the EBA guidelines on the assessment of O-SIIs; The CNB fully follows the EBA guidelines on the assessment of O-SIIs. b. which threshold score has been set to identify O-SIIs; <i>In accordance with paragraph 9 of the Guidelines, the CNB raises the threshold for designating entities as O-SIIs to the highest level allowed by the Guidelines (425 basis points, i.e. 4.25%).</i> c. whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process; <i>In accordance with paragraph 12 of the Guidelines, the CNB exempts investment firms from the calculation as they do not play a material role in the Czech financial system.</i> 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); <i>A separate excel file has been sent with the notification.</i> e. whether non-bank institutions have been included in the calculations. No 																					
<p>4.3 Supervisory judgement</p>	<p>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:</p> <ul style="list-style-type: none"> a. which of the optional indicators have been used to justify the supervisory assessment decisions, if any, and what the scores were; <ul style="list-style-type: none"> - b. why these optional indicators are relevant for the Member State; <ul style="list-style-type: none"> - c. why the bank is systemically important in terms of those particular optional indicators. <ul style="list-style-type: none"> - 																					
<p>4.4 Calibrating the O-SII buffer</p>	<p>To determine the O-SII buffer rate the CNB applies a bucketing approach with six buckets with the same bandwidths (300 bp). The decision on the bucket allocation and buffer rate takes into account the scores of institutions according to the EBA methodology. The rate in the highest bucket is 3%. Based on this, the following buckets, their score ranges and rates were determined as follows:</p> <table border="1" data-bbox="582 1435 917 1697"> <thead> <tr> <th>Bucket</th> <th>Score</th> <th>Rate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>425–724</td> <td>0,5%</td> </tr> <tr> <td>2</td> <td>725–1024</td> <td>1,0%</td> </tr> <tr> <td>3</td> <td>1,025–1,324</td> <td>1,5%</td> </tr> <tr> <td>4</td> <td>1,325–1,624</td> <td>2,0%</td> </tr> <tr> <td>5</td> <td>1,625–1,924</td> <td>2,5%</td> </tr> <tr> <td>6</td> <td>≥1,925</td> <td>3,0%</td> </tr> </tbody> </table> <p>Once the CNB has determined the O-SII buffer rate, it compares the rate with the regulatory O-SII cap. In the next step, the CNB applies supervisory judgement. For more information, see The CNB's approach to setting the capital buffer for other systemically important institutions: Past and present.</p>	Bucket	Score	Rate	1	425–724	0,5%	2	725–1024	1,0%	3	1,025–1,324	1,5%	4	1,325–1,624	2,0%	5	1,625–1,924	2,5%	6	≥1,925	3,0%
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<p>4.5 Effectiveness and proportionality of measure</p>	<p>The seven institutions identified represent about 85 % of the total assets of the Czech banking system. The impact of the failure of a systemic bank on the domestic financial sector and the real economy is much larger than the impact of the failure of a non-systemic bank.</p>																					

	<p>The aim of higher capital requirements for such institutions is to increase their loss absorption capacity, and thus reduce the risk of the disruption of the institutions' activities with a severe negative impact on the financial system and the real economy.</p> <p>However, we would like to point out that the upper bound limitation of the buffer given by the buffer of the parent institution results in a disproportionate treatment of some banks (see below).</p>
5. Sufficiency, consistency and non-overlap of the policy response	
5.1 Sufficiency of the policy response	<p>The O-SII buffers applicable to Czech banks were calibrated accounting for the banks' systemic importance. For more information, see The CNB's approach to setting the capital buffer for other systemically important institutions: Past and present.</p> <p>In the case of two institutions, the limit for subsidiary institutions resulted in a decrease in the O-SII buffer rate indicated by the interval approach. Nevertheless, the scope of the O-SII identification process and the level of O-SII buffers applied should be sufficient to significantly mitigate the crucial part of the contagion effects these institutions could cause.</p>
5.2 Consistency of application of the policy response	<p>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 Czech banking market. The measure should strengthen the resilience of the financial infrastructure through a build-up of loss absorption capacity within systemically important institutions. The measure is not applied in a fully consistent manner due to the existence of a cap for subsidiary institutions (answer to question 7.3).</p>
5.3 Non-overlap of the policy response	<p>No other policy instruments are used to address the systemic risk related to the systemic importance of the identified institutions.</p>
6. Cross-border and cross-sector impact of the measure	
6.1 Assessment of cross-border effects and the likely impact on the Internal Market (Recommendation ESRB/2015/2³)	<p>The measure will support financial stability in the Czech Republic by increasing the resilience of the most important domestic institutions in the financial system and reducing the risk of possible contagion to other Member States and the internal market. Given the relatively small size of the domestic financial sector vis-a-vis its European counterparts, no impact is expected to materialise as a result of the domestic O-SII buffer from the internal market perspective.</p>
6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State	<p>Given that the buffer is applied at the consolidated level and the overall adequate capitalisation of large banks, we do not see much potential for leakages or regulatory arbitrage.</p> <p>However, we cannot rule out the possibility that banks will try to reduce their systemic importance by optimising the individual components that make up the O-SII score. We will continue to make full use of supervisory judgement if this</p>

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).

	situation arises to ensure that any changes made by the banks are not only of a temporary and ad hoc nature.																																				
7. Combinations and interactions with other measures																																					
7.1 Combinations between G-SII and O-SII buffers (Article 131.14)	<p>There are no G-SIIs in the Czech Republic.</p> <table border="1" data-bbox="571 499 1441 651"> <thead> <tr> <th>Name of institution</th> <th>O-SII buffer</th> <th>G-SII buffer</th> </tr> </thead> <tbody> <tr> <td></td> <td style="text-align: center;">%</td> <td style="text-align: center;">%</td> </tr> <tr> <td></td> <td style="text-align: center;">%</td> <td style="text-align: center;">%</td> </tr> <tr> <td></td> <td style="text-align: center;">%</td> <td style="text-align: center;">%</td> </tr> </tbody> </table>	Name of institution	O-SII buffer	G-SII buffer		%	%		%	%		%	%																								
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7.2 Combinations with systemic risk buffers (SyRBs) (Article 131.15 CRD)	<p>There are currently no SyRBs in the Czech Republic, but a 0.5% SyRB will apply to all institutions authorised in the Czech Republic and all exposures located therein as of 1 January 2025. The O-SII buffer will be applied from 1 July 2025, but the institutions below will be considered O-SIIs as of 1 January 2025.</p> <table border="1" data-bbox="571 797 1422 1205"> <thead> <tr> <th>Name of institution</th> <th>SyRB rate</th> <th>SyRB application level</th> <th>Sum of G-SII/O-SII and SyRB rates</th> </tr> </thead> <tbody> <tr> <td>Československá obchodní banka, a.s.</td> <td style="text-align: center;">0.5%</td> <td></td> <td style="text-align: center;">3%</td> </tr> <tr> <td>Komerční banka, a.s.</td> <td style="text-align: center;">0.5%</td> <td></td> <td style="text-align: center;">2.5%</td> </tr> <tr> <td>Česká spořitelna, a.s.</td> <td style="text-align: center;">0.5%</td> <td></td> <td style="text-align: center;">3%</td> </tr> <tr> <td>UniCredit Bank CZ and SK, a.s.</td> <td style="text-align: center;">0.5%</td> <td></td> <td style="text-align: center;">2%</td> </tr> <tr> <td>Raiffeisenbank, a.s.</td> <td style="text-align: center;">0.5%</td> <td></td> <td style="text-align: center;">1%</td> </tr> <tr> <td>PPF Financial Holdings a.s.</td> <td style="text-align: center;">0.5%</td> <td></td> <td style="text-align: center;">1%</td> </tr> <tr> <td>J&T FINANCE GROUP SE</td> <td style="text-align: center;">0.5%</td> <td></td> <td style="text-align: center;">1%</td> </tr> <tr> <td></td> <td style="text-align: center;">%</td> <td></td> <td style="text-align: center;">%</td> </tr> </tbody> </table>	Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O-SII and SyRB rates	Československá obchodní banka, a.s.	0.5%		3%	Komerční banka, a.s.	0.5%		2.5%	Česká spořitelna, a.s.	0.5%		3%	UniCredit Bank CZ and SK, a.s.	0.5%		2%	Raiffeisenbank, a.s.	0.5%		1%	PPF Financial Holdings a.s.	0.5%		1%	J&T FINANCE GROUP SE	0.5%		1%		%		%
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7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)	<p>The constraint due to the parent institution's O-SII buffer rate lead the Československá obchodní banka rate to decrease from 3% under the bucketing approach to 2.5% (KBC is subject to an O-SII buffer rate of 1.5%) and the Komerční banka rate to decrease from 2.5 % to 2.0 % (SG is subject to a G-SII buffer rate of 1 %).</p> <p>Linking the subsidiary cap to the institution's owner implies potential volatility of this capital buffer in the event of an increase in frequency of acquisition and consolidation processes in the domestic and European banking sector. Another potentially sensitive issue is O-SII buffer rate volatility resulting from macroprudential authorities changing the buffer rates in the parent banks' home countries. This may make it difficult for the CNB to maintain a level playing field and lead to a situation of insufficient resilience compared to the identified risks associated with the systemic importance of the institutions.</p> <table border="1" data-bbox="571 1664 1422 1962"> <thead> <tr> <th>Name of O-SII subsidiary</th> <th>Name of the EU parent of the O-SII subsidiary</th> <th>Buffer applicable to O-SII EU parent</th> </tr> </thead> <tbody> <tr> <td>Československá obchodní banka, a.s.</td> <td style="text-align: center;">KBC Group NV</td> <td style="text-align: center;">1.5%</td> </tr> <tr> <td>Komerční banka, a.s.</td> <td style="text-align: center;">Société Générale SA</td> <td style="text-align: center;">1 %</td> </tr> <tr> <td>Česká spořitelna, a.s.</td> <td style="text-align: center;">Erste Group Bank AG</td> <td style="text-align: center;">1,5 %</td> </tr> <tr> <td>UniCredit Bank CZ and SK, a.s.</td> <td style="text-align: center;">UniCredit S.p.A.</td> <td style="text-align: center;">1,5 %</td> </tr> <tr> <td>Raiffeisenbank, a.s.</td> <td style="text-align: center;">Raiffeisen Bank International AG</td> <td style="text-align: center;">1,5 %</td> </tr> </tbody> </table>	Name of O-SII subsidiary	Name of the EU parent of the O-SII subsidiary	Buffer applicable to O-SII EU parent	Československá obchodní banka, a.s.	KBC Group NV	1.5%	Komerční banka, a.s.	Société Générale SA	1 %	Česká spořitelna, a.s.	Erste Group Bank AG	1,5 %	UniCredit Bank CZ and SK, a.s.	UniCredit S.p.A.	1,5 %	Raiffeisenbank, a.s.	Raiffeisen Bank International AG	1,5 %																		
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8. Miscellaneous																																					

8.1 Contact person(s)/mailbox at notifying authority	Libor Holub, +420 224 412 502, libor.holub@cnb.cz Safwan Naser, +420 224 413 419, safwan.naser@cnb.cz
8.2 Any other relevant information	
8.3 Date of the notification	29/10/2024