



## 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](mailto:macropru.notifications@ecb.europa.eu) when notifying the ECB (under Article 5 of the Single Supervisory Mechanism (SSM) Regulation<sup>1</sup>);
- [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 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 authority	
1.1 Name of the notifying authority	Národná banka Slovenska
1.2 Country of the notifying authority	Slovakia
2. Description of the measure	
2.1a Institution or group of institutions concerned	<p><i>On which institution(s) is the measure applied (name and Legal Entity Identifier (LEI) code)?</i></p> <p><i>Is the measure applied at:</i></p> <ul style="list-style-type: none"> <li>- <i>The highest level of consolidation?</i></li> <li>- <i>A sub-consolidated level?</i></li> <li>- <i>An individual level?</i></li> </ul>

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authority, it may be agreed with the Head of the ESRB Secretariat that this notification, or a part thereof, should not be published for reasons of confidentiality or financial stability.



	Name of institution	LEI	Consolidation level
	Všeobecná úverová banka, a. s.	549300JB1P61FUTPEZ75	individual and sub-consolidated
	Slovenská sporiteľňa, a. s.	549300S2T3FWVWXWJI89	individual and sub-consolidated
	Tatra banka, a. s.	3157002JBFAI478MD587	individual and sub-consolidated
	Československá obchodná banka, a. s.	52990096Q5LMCH1WU462	individual and sub-consolidated
	Prima banka Slovensko, a. s.	315700K45LRKNGMUIW27	individual and sub-consolidated
	365.bank, a. s.	315700PLTAXHBHZP5J02	individual and sub-consolidated
<b>2.1b Changes to the list of institutions concerned</b>	No change has been made to the last notification		
<b>2.2 Level of the buffer applied</b>	<i>At what level is the fully phased-in buffer (in %) applied to the institution(s)?</i>		
	Name of institution	New O-SII buffer	Previous O-SII buffer
	Všeobecná úverová banka, a. s.	1.75%	1.75%
	Slovenská sporiteľňa, a. s.	2.00%	2.00%
	Tatra banka, a. s.	1.50%	1.50%
	Československá obchodná banka, a. s.	1.25%	1.25%
	Prima banka Slovensko, a. s.	0.25%	0.25%
	365 bank, a. s.	0.25%	0.25%
<b>2.3 Name of the EU ultimate parent institution</b>	<i>Please provide the name and LEI code of the ultimate EU parent institution of the group for each of the O-SIIs identified. If the ultimate EU parent institution is not the concerned institution itself.</i>		
	Name of identified O-SII	Ultimate EU parent institution	LEI of ultimate parent institution
	Všeobecná úverová banka, a. s.	Gruppo Intesa Sanpaolo	815600A0090DB5D4D574
	Slovenská sporiteľňa, a. s.	Erste Group Bank AG	PQOH26KWDF7CG10L6792
	Tatra banka, a. s.	Raiffeisen Bank International AG	529900JP9C734S1LE008
	Československá obchodná banka, a. s.	KBC Group NV	213800X3Q9LSAKRUWY91
	Prima banka Slovensko, a. s.	Penta Investments Limited	315700B14D4M8960OB55
	365 bank, a. s.	J&T Finance Group SE	315700E9POA724IWF59
<b>2.4 Names of subsidiaries</b>	<i>If any of the O-SIIs identified is a parent institution and the buffer is applied at a (sub)consolidated level, please name the subsidiaries of the institution that are notified as O-SIIs (please give names and LEI codes).</i>		
	Name of parent O-SII identified	Name of O-SII subsidiary	LEI of O-SII subsidiary
	Československá obchodná banka, a. s.	ČSOB stavebná sporiteľňa, a. s.	097900BEMW000006310
<b>3. Timing of the measure</b>			



<b>3.1 Timing of the Decision</b>	<p><i>What is the date of the official decision? For SSM countries when notifying the ECB: provide the date on which the decision referred to in Article 5 of the Single Supervisory Mechanism Regulation (SSMR) will be taken.</i></p> <p>22/05/2023</p>
<b>3.2 Timing of the Publication</b>	<p><i>What is the date of publication of the notified measure?</i></p> <p>01/06/2023</p>
<b>3.3 Disclosure</b>	<p><i>Information about the strategy for if the communicating the notified measure to the market.</i></p> <p><i>Please provide a link to the public announcement, if any.</i></p> <p>The decision will be published on the website of Národná banka Slovenska (<a href="https://nbs.sk/en/financial-stability/fs-instruments/o-sii/">https://nbs.sk/en/financial-stability/fs-instruments/o-sii/</a>) and will be also delivered via mail to all the identified O-SIIs.</p>
<b>3.4 Timing of Application</b>	<p><i>What is the intended date of application of the measure?</i></p> <p>01/01/2024</p>
<b>3.5 Phasing in</b>	<p><i>What is the intended timeline for the phase-in of the measure?</i></p> <p>As this decision is about to reset O-SII buffers, there is no phase-in planned and the O-SII buffers will be fully applied from 1 January 2024.</p>
<b>3.6 Review of the measure</b>	<p><i>When will the measure be reviewed (Article 131, paragraphs (6) and (12), specify that the buffer, the identification of O-SIIs and their allocation to subcategories must be reviewed at least annually)?</i></p> <p>The next decision should be taken in May 2024.</p>

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

<b>4.1 Scores of institutions or group of institutions concerned, as per EBA guidelines on the assessment of O-SIIs (Article 131.3 CRD)</b>	<p><i>Please list here the names, overall scores and category scores of the O-SIIs identified based on</i></p> <ul style="list-style-type: none"> <li><i>a. size;</i></li> <li><i>b. importance for the economy of the relevant Member State or the Union, capturing substitutability/financial institution infrastructure;</i></li> <li><i>c. complexity, including the additional complexities from cross-border activity;</i></li> <li><i>d. interconnectedness of the institution or (sub-)group with the financial system.</i></li> </ul>																																										
	<table border="1"> <thead> <tr> <th>Name of institution</th> <th>Size</th> <th>Substitutability</th> <th>Complexity</th> <th>Interconnectedness</th> <th>Overall Score</th> </tr> </thead> <tbody> <tr> <td>Všeobecná úverová banka, a. s.</td> <td>2,021</td> <td>1,918</td> <td>3,251</td> <td>2,202</td> <td>2,348</td> </tr> <tr> <td>Slovenská sporiteľňa, a. s.</td> <td>2,108</td> <td>1,979</td> <td>798</td> <td>1,571</td> <td>1,614</td> </tr> <tr> <td>Tatra banka, a. s.</td> <td>1,925</td> <td>2,095</td> <td>1,059</td> <td>1,332</td> <td>1,603</td> </tr> <tr> <td>Československá obchodná banka, a. s.</td> <td>1,225</td> <td>956</td> <td>1,973</td> <td>1,675</td> <td>1,457</td> </tr> <tr> <td>Prima banka Slovensko, a. s.</td> <td>531</td> <td>441</td> <td>107</td> <td>435</td> <td>378</td> </tr> <tr> <td>365 bank, a. s.</td> <td>420</td> <td>357</td> <td>265</td> <td>372</td> <td>354</td> </tr> </tbody> </table>	Name of institution	Size	Substitutability	Complexity	Interconnectedness	Overall Score	Všeobecná úverová banka, a. s.	2,021	1,918	3,251	2,202	2,348	Slovenská sporiteľňa, a. s.	2,108	1,979	798	1,571	1,614	Tatra banka, a. s.	1,925	2,095	1,059	1,332	1,603	Československá obchodná banka, a. s.	1,225	956	1,973	1,675	1,457	Prima banka Slovensko, a. s.	531	441	107	435	378	365 bank, a. s.	420	357	265	372	354
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<p><b>4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)</b></p>	<p>Please provide information on:</p> <ul style="list-style-type: none"> <li>a. whether you followed the EBA guidelines on the assessment of O-SIIs; The EBA guidelines were fully followed when identifying O-SIIs.</li> <li>b. which threshold score has been set to identify O-SIIs; In the first step the threshold was set to 350 basis points. Due to the relatively small number of banks in the Slovak banking sector the threshold in the second step was set to 425 basis points.</li> <li>c. whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process; As the Slovak banking sector consists only of 11 banks/subsidiaries and 14 branches as of 31 December 2022, all banks as well as branches have been included in the calculations.</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. Non-bank institutions have not been included in the calculation.</li> </ul>																
<p><b>4.3 Supervisory judgement</b></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"> <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> <p>All 6 O-SIIs have been identified in the first step. In the second step the 10 mandatory indicators were added by the three optional indicators: total risk exposure amount, retail loans and retail deposits. These optional indicators characterize a traditional Slovak banking sector better and are suitable for O-SII identification. These optional indicators have been included in a 5th category (criterion) "optional indicators". The weights have been set in line with the EBA methodology: every criterion has an equal weight and within every criterion all indicators are equally weighted. In the second step of decision 2023 no other bank as O-SII was identified.</p>																
<p><b>4.4 Calibrating the O-SII buffer</b></p>	<p>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.</p> <p>Identified O-SIIs are required to maintain a level of O-SII buffer (see section 6). The O-SII buffers have been calibrated according the score of the identified institutions.</p> <p>The latest annual review, conducted in accordance with EBA/GL/2014/10, was based on data as at end-2022. Since the list of O-SIIs identified on that basis is</p>																



	<p>identical to the list identified on the basis of data as at end-2021, no change has been made to the list of O-SIIs.</p>
<b>4.5 Effectiveness and proportionality of measure</b>	<p><i>Please provide a justification for why the O-SII buffer is considered likely to be effective and proportionate to mitigate the risk.</i></p> <p>As the decision is only to reset the O-SII buffers within the annual review, this point is not relevant.</p>
<b>5. Sufficiency, consistency and non-overlap of the policy response</b>	
<b>5.1 Sufficiency of the policy response</b>	<p><i>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.</i></p> <p><i>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.</i></p> <p><i>Please provide any additional information that the ESRB should consider in assessing the sufficiency of the policy response.</i></p> <p>Due to the relatively small and concentrated banking sector in Slovakia, in second step an increased limit of 425 basis points is used to identify O-SII. Also in 2023, three additional indicators were used: total risk exposures, retail loans and retail deposits. These indicators are included in the fifth category of the additional indicators, with the weights being distributed evenly between the individual categories and within the categories between the individual indicators, as in the case of the EBA guideline. These indicators sufficiently complement the picture of risks in the banking sector.</p>
<b>5.2 Consistency of application of the policy response</b>	<p><i>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.</i></p> <p><i>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.</i></p> <p><i>Please provide any additional information that the ESRB should consider in assessing the consistency of the policy response.</i></p> <p>The Slovak banking sector is characterized by a traditional business model. Therefore, we have added three additional indicators. When determining a buffer, we take into account the decisions of other national authorities to maintain a "level playing field". Slovak banks are at least in the middle of a group of banks with a similar score and buffer rate.</p>

<sup>3</sup> Recommendation of the European Systemic Risk Board of 4 April 2013 on intermediate objectives and instruments of macroprudential policy (ESRB/2013/1) (OJ C 170, 15.6.2013, p. 1)



<p><b>5.3 Non-overlap of the policy response</b></p>	<p><i>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.</i></p> <ul style="list-style-type: none"> <li>- <i>Are other policy instruments used to address the <u>same</u> systemic risk?</i></li> <li>- <i>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.</i></li> </ul> <p>O-SII buffer is aimed at local systemic risk considering the share of individual entities.</p>
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**6. Cross-border and cross-sector impact of the measure**

<p><b>6.1 Assessment of cross-border effects and the likely impact on the internal market</b> <b>(Recommendation ESRB/2015/2)</b></p>	<p><i>Assessment of the cross-border effects of implementation of the measure.</i></p> <p>a. <i>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 Macroprudential Policy in the Banking Sector<sup>4</sup> and the <a href="#">Framework to assess cross-border spillover effects of macroprudential policies</a> of the ECB Task Force on cross-border spillover effects of macroprudential measures can be used.</i></p> <p>b. <i>Assessment of the:</i></p> <ul style="list-style-type: none"> <li>o <i>cross-border effects of implementation of the measure in your own jurisdiction (inward spillovers);</i></li> <li>o <i>cross-border effects on other Member States and on the Single Market of the measure (outward spillovers);</i></li> <li>o <i>overall impact on the Single Market of implementation of the measure.</i></li> </ul> <p>As the decision is only to reset the O-SII buffers within the annual review, this point is not relevant.</p>
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<p><b>6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State</b></p>	<p><i>Referring to your Member State'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)?</i></p> <p><i>Is there scope for "leakages and regulatory arbitrage" in other jurisdictions?</i></p> <p>As the decision is only to reset the O-SII buffers within the annual review, this point is not relevant.</p>
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**7. Combinations and interactions with other measures**

<p><b>7.1 Combinations between G-SII and O-SII buffers (Article 131.14)</b></p>	<p><i>If both G-SII and O-SII criteria apply to the same institution at consolidated level, which of the two buffers is the highest?</i></p> <p>N/A: there are no G-SIIs identified in Slovakia.</p>
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<p><b>7.2 Combinations with systemic</b></p>	<p><i>Are any of the institutions identified as O-SIIs subject to a systemic risk buffer?</i></p> <p><i>If yes, please provide the following information:</i></p>
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<sup>4</sup> Available on the ESRB's website at [www.esrb.europa.eu](http://www.esrb.europa.eu).



<p><b>risk buffers (SyRBs)</b> <b>(Article 131.15 CRD)</b></p>	<p>a. <i>What is/are the systemic risk buffer rates(s)?</i></p> <p>b. <i>At what level is/are the systemic risk buffer rate(s) applied (i.e. consolidation level and/or individual)?</i></p> <p>c. <i>Is the sum of the systemic risk buffer rate(s) and the O-SII buffer rate (or the higher of the G-SII and O-SII buffer rates, if a group is subject to a G-SII buffer and to an O-SII buffer at consolidated level) to which the same institution is subject over 5%?</i></p> <p>N/A</p>
<p><b>7.3 O-SII requirement for a subsidiary (Article 131.8)</b></p>	<p><i>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?</i></p> <p><i>Does the cap for the subsidiary prevent the implementation of a higher O-SII buffer based on the domestic buffer setting methodology?</i></p> <p>N/A</p>
<p><b>8. Miscellaneous</b></p>	
<p><b>8.1 Contact person(s)/mailbox at notifying authority</b></p>	<p><i>Contact person(s) (name, phone number and e-mail address) and mailbox for further inquiries.</i></p> <p>Marek Ličák, phone: +421 2 5787 2863, e-mail: <a href="mailto:marek.licak@nbs.sk">marek.licak@nbs.sk</a></p> <p>Andrej Moravčík, phone: +421 2 5787 2995, e-mail: <a href="mailto:andrej.moravcik@nbs.sk">andrej.moravcik@nbs.sk</a></p>
<p><b>8.2 Any other relevant information</b></p>	
<p><b>8.3 Date of the notification</b></p>	<p><i>Please provide the date on which this notification was uploaded/sent.</i></p> <p>05/05/2023</p>