

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	FIN-FSA									
1.2 Country of the notifying authority	Finland									
2. Description of the measure										
2.1a Institution or group of institutions concerned	On which institution(s) is the measure applied (name and Legal Entity Identifier (LEI) code)?									
	Is the measure applied at:									
	<ul style="list-style-type: none"> - The highest level of consolidation? - A sub-consolidated level? - An individual level? 									
	<table border="1"> <thead> <tr> <th>Name of institution</th> <th>LEI</th> <th>Consolidation level</th> </tr> </thead> <tbody> <tr> <td>Nordea Bank Abp</td> <td>529900ODI3047E2LIV03</td> <td>Highest</td> </tr> <tr> <td>OP Financial Group</td> <td>7437003B5WFB0IEFY714</td> <td>Highest</td> </tr> </tbody> </table>		Name of institution	LEI	Consolidation level	Nordea Bank Abp	529900ODI3047E2LIV03	Highest	OP Financial Group	7437003B5WFB0IEFY714
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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.

	Municipality Finance Plc	529900HEKOENJHPNN480	Highest
2.1b Changes to the list of institutions concerned	Please indicate under 2.1a any changes to the list as compared to the last notification, and provide an explanation, if applicable. There are no changes made.		
2.2 Level of the buffer applied	At what level is the fully phased-in buffer (in %) applied to the institution(s)?		
	Name of institution	New O-SII buffer	Previous O-SII buffer
	Nordea Bank Abp	2.5 %	2.5 %
	OP Financial Group	1.5 %	1.5 %
	Municipality Finance Plc	0.5 %	0.5 %
2.3 Name of the ultimate EU parent institution	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.		
	Name of identified O-SII	Ultimate EU parent institution	LEI of ultimate parent institution
2.4 Names of subsidiaries	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).		
	Name of parent O-SII identified	Name of O-SII subsidiary	LEI of O-SII subsidiary
3. Timing for the measure			
3.1 Timing for the decision	What is the date of the official decision? <u>For SSM countries when notifying the ECB:</u> provide the date on which the decision referred to in Article 5 of the Single Supervisory Mechanism Regulation (SSMR) will be taken. No formal decision has been made, the O-SII buffers have only been reviewed pursuant to the Act on Credit Institutions. 28/06/2023		

3.2 Timing for publication	What is the date of publication of the notified measure? 29/06/2023																																																
3.3 Disclosure	Information about the strategy for if the communicating the notified measure to the market. Please provide a link to the public announcement, if any. https://www.finanssivalvonta.fi/en/financial-market-stability/macprudential/macprudential-decisions-and-appendices/macprudential-decisions-2023/macprudential-decision-28-june-2023/																																																
3.4 Timing for application	What is the intended date of application of the measure? Click here to enter a date.																																																
3.5 Phasing in	What is the intended timeline for the phase-in of the measure? <table border="1" data-bbox="571 757 1447 871"> <thead> <tr> <th>Name of institution</th> <th>Date1</th> <th>Date2</th> <th>Date3</th> <th>Date4</th> <th>Date5</th> </tr> </thead> <tbody> <tr> <td></td> <td>%</td> <td>%</td> <td>%</td> <td>%</td> <td>%</td> </tr> <tr> <td></td> <td>%</td> <td>%</td> <td>%</td> <td>%</td> <td>%</td> </tr> </tbody> </table>	Name of institution	Date1	Date2	Date3	Date4	Date5		%	%	%	%	%		%	%	%	%	%																														
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3.6 Review of the measure	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)? January-June 2024																																																
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)	Please list here the names, overall scores and category scores of the O-SIIs identified based on <ul style="list-style-type: none"> a. size; b. importance for the economy of the relevant Member State or the Union, capturing substitutability/financial institution infrastructure; c. complexity, including the additional complexities from cross-border activity; d. interconnectedness of the institution or (sub-)group with the financial system. <table border="1" data-bbox="571 1431 1447 1892"> <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>Nordea Bank Abp</td> <td>58.82</td> <td>47.33</td> <td>89.28</td> <td>64.17</td> <td>64.90</td> </tr> <tr> <td>OP Financial Group</td> <td>17.33</td> <td>16.50</td> <td>3.29</td> <td>9.66</td> <td>11.70</td> </tr> <tr> <td>Municipality Finance Plc</td> <td>5.30</td> <td>1.17</td> <td>1.90</td> <td>8.64</td> <td>4.25</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>Please provide other relevant information (indicator values, methodology, calculations and formulas, data sources, information set used for denominators) in a separate Excel file.</p>	Name of institution	Size	Substitutability	Complexity	Interconnectedness	Overall Score	Nordea Bank Abp	58.82	47.33	89.28	64.17	64.90	OP Financial Group	17.33	16.50	3.29	9.66	11.70	Municipality Finance Plc	5.30	1.17	1.90	8.64	4.25																								
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<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; yYes b. which threshold score has been set to identify O-SIIs; 2.75 % c. whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process; No, all entities are included. 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); See enclosed word-file. e. whether non-bank institutions have been included in the calculations. All Finnish credit institutions and branches operating in Finland are included in the calculations.
<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: No</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; b. why these optional indicators are relevant for the Member State; c. why the bank is systemically important in terms of those particular optional indicators.
<p>4.4 Calibrating the O-SII buffer</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. Please see the previously submitted notification in May 2022.</p>
<p>4.5 Effectiveness and proportionality of measure</p>	<p>Please provide a justification for why the O-SII buffer is considered likely to be effective and proportionate to mitigate the risk. Please see the previously submitted notification in May 2022.</p>
<p>5. Sufficiency, consistency and non-overlap of the policy response</p>	
<p>5.1 Sufficiency of the policy response</p>	<p>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.</p> <p>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.</p> <p>Please provide any additional information that the ESRB should consider in assessing the sufficiency of the policy response. Please see the previously submitted notification in May 2022.</p>
<p>5.2 Consistency of application of the policy response</p>	<p>For a macroprudential policy to be ‘consistent’, the policy instruments meet their respective objectives, as outlined in ESRB/2013/1³, and must be implemented in accordance with the common principles set out in the relevant legal texts. Please see the previously submitted notification in May 2022.</p>

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

	<p>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.</p> <p>Please provide any additional information that the ESRB should consider in assessing the consistency of the policy response.</p>												
5.3 Non-overlap of the policy response	<p>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. Please see the previously submitted notification in May 2022.</p> <ul style="list-style-type: none"> - Are other policy instruments used to address the <u>same</u> systemic risk? - 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. 												
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/2015/2⁴)	<p>Assessment of the cross-border effects of implementation of the measure.</p> <p>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 Macroprudential Policy in the Banking Sector⁵ and the Framework to assess cross-border spillover effects of macroprudential policies of the ECB Task Force on cross-border spillover effects of macroprudential measures can be used. Please see the previously submitted notification in May 2022.</p> <p>b. Assessment of the:</p> <ul style="list-style-type: none"> o cross-border effects of implementation of the measure in your own jurisdiction (inward spillovers); o cross-border effects on other Member States and on the Single Market of the measure (outward spillovers); o overall impact on the Single Market of implementation of the measure. 												
6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State	<p>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)? Please see the previously submitted notification in May 2022.</p> <p>Is there scope for "leakages and regulatory arbitrage" in other jurisdictions?</p>												
7. Combinations and interactions with other measures													
7.1 Combinations between G-SII and O-SII buffers (Article 131.14)	<p>If both G-SII and O-SII criteria apply to the same institution at consolidated level, which of the two buffers is the highest? There are no G-SIIs in Finland</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Name of institution</th> <th style="width: 25%;">O-SII buffer</th> <th style="width: 25%;">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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⁴ 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).

⁵ Available on the ESRB's website at www.esrb.europa.eu.

<p>7.2 Combinations with systemic risk buffers (SyRBs) (Article 131.15 CRD)</p>	<p>Are any of the institutions identified as O-SIIs subject to a systemic risk buffer?</p> <p>The systemic risk buffer will enter into force on 1 April 2024. The rate of the systemic risk buffer is 1.0 %, and it applies to all credit institutions on the highest level of consolidation.</p> <p>If yes, please provide the following information:</p> <ol style="list-style-type: none"> What is/are the systemic risk buffer rates(s)? At what level is/are the systemic risk buffer rate(s) applied (i.e. consolidation level and/or individual)? 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%? <table border="1" data-bbox="571 645 1422 1030"> <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></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> </tbody> </table>	Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O-SII and SyRB rates		%		%		%		%		%		%		%		%		%		%		%		%		%		%		%		%		%		%
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<p>7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)</p>	<p>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?</p> <p>Does the cap for the subsidiary prevent the implementation of a higher O-SII buffer based on the domestic buffer setting methodology?</p> <table border="1" data-bbox="571 1227 1422 1424"> <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></td><td></td><td>%</td></tr> <tr><td></td><td></td><td>%</td></tr> <tr><td></td><td></td><td>%</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			%			%			%																												
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<p>8. Miscellaneous</p>																																									
<p>8.1 Contact person(s)/mailbox at notifying authority</p>	<p>Contact person(s) (name, phone number and e-mail address) and mailbox for further inquiries. Peik Granlund, tel. +35891835236, peik.granlund@fiva.fi</p>																																								
<p>8.2 Any other relevant information</p>																																									
<p>8.3 Date of the notification</p>	<p>Please provide the date on which this notification was uploaded/sent. 20/07/2023</p>																																								