



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 | Hrvatska narodna banka (HNB) | | |
| 1.2 Country of the notifying authority | Croatia | | |
| 2. Description of the measure | | | |
| 2.1a Institution or group of institutions concerned | Name of institution | LEI | Consolidation level |
| | Zagrebačka banka d.d., Zagreb | PRNXTNXHBI0TSY1V8P17 | Sub-consolidated and individual level |
| | Privredna banka Zagreb d.d., Zagreb | 549300ZHFZ4CSK7VS460 | Sub-consolidated and individual level |
| | Erste&Steiermärkische Bank d.d. Rijeka | 549300A2F46GR0UOM390 | Sub-consolidated and individual level |
| | Raiffeisenbank Austria d.d., Zagreb | 52990011UZV70CZRAU55 | Sub-consolidated and individual level |
| | OTP banka Hrvatska d.d., Zagreb | 5299005UJX6K7BQKV086 | Sub-consolidated and individual level |
| | Hrvatska poštanska banka d.d., Zagreb | 529900D5G4V6THXC5P79 | Individual level |
| | Addiko Bank d.d. | RG3IZJKPYQ4H6IQPIC08 | Individual level |

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 | No changes occurred. | | |
| 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 |
| | Zagrebačka banka d.d., Zagreb | 2.5% | 2% |
| | Privredna banka Zagreb d.d., Zagreb | 2% | 2% |
| | Erste&Steiermärkische Bank d.d. Rijeka | 2% | 2% |
| | Raiffeisenbank Austria d.d., Zagreb | 1.5% | 1.5% |
| | OTP banka Hrvatska d.d., Zagreb | 1.5% | 1.5% |
| | Hrvatska poštanska banka d.d., Zagreb | 1.0% | 0.5% |
| | Addiko Bank d.d. | 0.25% | 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 |
| | Zagrebačka banka d.d., Zagreb | UniCredit S.p.A. | 549300TRUWO2CD2G5692 |
| | Privredna banka Zagreb d.d., Zagreb | Intesa Sanpaolo S.p.A. | 2W8N8UU78PMDQKZENC08 |
| | Erste&Steiermärkische Bank d.d. Rijeka | Erste Group Bank AG | PQOH26KWDF7CG10L6792 |
| | Raiffeisenbank Austria d.d., Zagreb | Raiffeisen Bank International AG | 9ZHRYM6F437SQJ6OUG95 |
| | OTP banka Hrvatska d.d., Zagreb | OTP Bank Nyrt. | 529900W3MOO00A18X956 |
| | Addiko Bank d.d. | Addiko Bank AG | 529900UKZBMDBDZIXD62 |
| 2.4 Names of subsidiaries | Not applicable | | |
| | 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. 20/11/2023 | | |
| 3.2 Timing for publication | What is the date of publication of the notified measure? 20/11/2023 | | |

| 3.3 Disclosure | Official decision to identified O-SI institutions via registered post and publication on HNB's web page . | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---------------------|------------|--------------------|---------------|--------------------|---------------|-------------------------------|------|------|------|------|------|-------------------------------------|------|------|------|------|------|--|------|------|------|------|------|-------------------------------------|-----|-----|-----|------|-----|---------------------------------|-----|------|-----|-----|-----|---------------------------------------|-----|-----|----|-----|-----|------------------|-----|-----|-----|-----|-----|--|--|--|--|--|--|
| 3.4 Timing for application | What is the intended date of application of the measure? 01/01/2024 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.5 Phasing in | Not applicable <table border="1" data-bbox="571 443 1444 555"> <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 | | % | % | % | % | % | | % | % | % | % | % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Name of institution | Date1 | Date2 | Date3 | Date4 | Date5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | % | % | % | % | % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | % | % | % | % | % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.6 Review of the measure | At least annually. HNB intends to perform its review each year in autumn, based on reported data as of end-December of the preceding year. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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) | <p>Please list here the names, overall scores and category scores of the O-SIIs identified based on</p> <ol style="list-style-type: none"> size; importance for the economy of the relevant Member State or the Union, capturing substitutability/financial institution infrastructure; complexity, including the additional complexities from cross-border activity; interconnectedness of the institution or (sub-)group with the financial system. <table border="1" data-bbox="571 1088 1444 1581"> <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>Zagrebačka banka d.d., Zagreb</td> <td>2729</td> <td>2794</td> <td>4124</td> <td>2670</td> <td>3079</td> </tr> <tr> <td>Privredna banka Zagreb d.d., Zagreb</td> <td>2410</td> <td>2192</td> <td>3103</td> <td>1468</td> <td>2298</td> </tr> <tr> <td>Erste&Steiermärkische Bank d.d. Rijeka</td> <td>1728</td> <td>1576</td> <td>1237</td> <td>2842</td> <td>1864</td> </tr> <tr> <td>Raiffeisenbank Austria d.d., Zagreb</td> <td>749</td> <td>913</td> <td>696</td> <td>1357</td> <td>929</td> </tr> <tr> <td>OTP banka Hrvatska d.d., Zagreb</td> <td>927</td> <td>1002</td> <td>488</td> <td>516</td> <td>733</td> </tr> <tr> <td>Hrvatska poštanska banka d.d., Zagreb</td> <td>639</td> <td>678</td> <td>40</td> <td>557</td> <td>479</td> </tr> <tr> <td>Addiko Bank d.d.</td> <td>264</td> <td>292</td> <td>120</td> <td>117</td> <td>198</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. - see attached excel file</p> | Name of institution | Size | Substitutability | Complexity | Interconnectedness | Overall Score | Zagrebačka banka d.d., Zagreb | 2729 | 2794 | 4124 | 2670 | 3079 | Privredna banka Zagreb d.d., Zagreb | 2410 | 2192 | 3103 | 1468 | 2298 | Erste&Steiermärkische Bank d.d. Rijeka | 1728 | 1576 | 1237 | 2842 | 1864 | Raiffeisenbank Austria d.d., Zagreb | 749 | 913 | 696 | 1357 | 929 | OTP banka Hrvatska d.d., Zagreb | 927 | 1002 | 488 | 516 | 733 | Hrvatska poštanska banka d.d., Zagreb | 639 | 678 | 40 | 557 | 479 | Addiko Bank d.d. | 264 | 292 | 120 | 117 | 198 | | | | | | |
| Name of institution | Size | Substitutability | Complexity | Interconnectedness | Overall Score | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Zagrebačka banka d.d., Zagreb | 2729 | 2794 | 4124 | 2670 | 3079 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Privredna banka Zagreb d.d., Zagreb | 2410 | 2192 | 3103 | 1468 | 2298 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Erste&Steiermärkische Bank d.d. Rijeka | 1728 | 1576 | 1237 | 2842 | 1864 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Raiffeisenbank Austria d.d., Zagreb | 749 | 913 | 696 | 1357 | 929 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OTP banka Hrvatska d.d., Zagreb | 927 | 1002 | 488 | 516 | 733 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hrvatska poštanska banka d.d., Zagreb | 639 | 678 | 40 | 557 | 479 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Addiko Bank d.d. | 264 | 292 | 120 | 117 | 198 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.2 Methodology and indicators used for designation of the O-SII (Article 131.3) | <ol style="list-style-type: none"> The identification process followed the methodology set out in the EBA Guidelines (EBA/GL/2014/10); Threshold: 275 basis points. Lower threshold is used to account for institutions with scores lower than 350 basis points, but still distinctively higher from scores of other institutions. According to their size, complexity and potential impact on the economy they belong to the group of institutions of systemic importance; | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | <p>c. All credit institutions were included in calculation (including ones not exceeding 0.02% of relative total assets and branches for the purpose of calculating system-wide aggregates – denominators);</p> <p>d.</p> <table border="1" data-bbox="571 320 1444 703"> <thead> <tr> <th>Name of the institution</th> <th>Size</th> <th>Substitutability</th> <th>Complexity</th> <th>Interconnectedness</th> <th>Overall Score</th> </tr> </thead> <tbody> <tr><td>Zagrebačka banka d.d.</td><td>2729</td><td>2794</td><td>4124</td><td>2670</td><td>3079</td></tr> <tr><td>Privredna banka Zagreb d.d.</td><td>2410</td><td>2192</td><td>3103</td><td>1486</td><td>2298</td></tr> <tr><td>Erste&Steiermärkische Bank d.d.</td><td>1728</td><td>1576</td><td>1237</td><td>2842</td><td>1846</td></tr> <tr><td>Raiffeisenbank Austria d.d.</td><td>749</td><td>913</td><td>696</td><td>1357</td><td>929</td></tr> <tr><td>OTP banka d.d.</td><td>927</td><td>1002</td><td>488</td><td>516</td><td>733</td></tr> <tr><td>Hrvatska poštanska banka d.d.</td><td>639</td><td>678</td><td>40</td><td>557</td><td>479</td></tr> <tr><td>Addiko Bank d.d.</td><td>264</td><td>292</td><td>120</td><td>117</td><td>198</td></tr> <tr><td>Podravska banka d.d.</td><td>70</td><td>62</td><td>21</td><td>96</td><td>62</td></tr> <tr><td>Agram banka d.d.</td><td>66</td><td>61</td><td>9</td><td>66</td><td>50</td></tr> <tr><td>Istarska kreditna banka Umag d.d.</td><td>81</td><td>88</td><td>11</td><td>20</td><td>50</td></tr> <tr><td>KentBank d.d.</td><td>62</td><td>63</td><td>30</td><td>40</td><td>49</td></tr> <tr><td>Karlovačka banka d.d.</td><td>51</td><td>46</td><td>5</td><td>21</td><td>31</td></tr> <tr><td>Partner banka d.d.</td><td>33</td><td>36</td><td>3</td><td>23</td><td>24</td></tr> <tr><td>Banka Kovanica d.d.</td><td>24</td><td>29</td><td>20</td><td>6</td><td>20</td></tr> <tr><td>Wüstenrot stambena štedionica d.d.</td><td>32</td><td>36</td><td>1</td><td>10</td><td>20</td></tr> <tr><td>Croatia banka d.d.</td><td>28</td><td>24</td><td>6</td><td>7</td><td>16</td></tr> <tr><td>Slatinska banka d.d.</td><td>24</td><td>27</td><td>2</td><td>4</td><td>15</td></tr> <tr><td>Imex banka d.d.</td><td>18</td><td>19</td><td>5</td><td>2</td><td>11</td></tr> <tr><td>J&T banka d.d.</td><td>10</td><td>11</td><td>9</td><td>6</td><td>9</td></tr> <tr><td>Samoborska banka d.d.</td><td>10</td><td>9</td><td>0</td><td>6</td><td>6</td></tr> </tbody> </table> <p>e. Non-bank institutions were not included in the calculations</p> | Name of the institution | Size | Substitutability | Complexity | Interconnectedness | Overall Score | Zagrebačka banka d.d. | 2729 | 2794 | 4124 | 2670 | 3079 | Privredna banka Zagreb d.d. | 2410 | 2192 | 3103 | 1486 | 2298 | Erste&Steiermärkische Bank d.d. | 1728 | 1576 | 1237 | 2842 | 1846 | Raiffeisenbank Austria d.d. | 749 | 913 | 696 | 1357 | 929 | OTP banka d.d. | 927 | 1002 | 488 | 516 | 733 | Hrvatska poštanska banka d.d. | 639 | 678 | 40 | 557 | 479 | Addiko Bank d.d. | 264 | 292 | 120 | 117 | 198 | Podravska banka d.d. | 70 | 62 | 21 | 96 | 62 | Agram banka d.d. | 66 | 61 | 9 | 66 | 50 | Istarska kreditna banka Umag d.d. | 81 | 88 | 11 | 20 | 50 | KentBank d.d. | 62 | 63 | 30 | 40 | 49 | Karlovačka banka d.d. | 51 | 46 | 5 | 21 | 31 | Partner banka d.d. | 33 | 36 | 3 | 23 | 24 | Banka Kovanica d.d. | 24 | 29 | 20 | 6 | 20 | Wüstenrot stambena štedionica d.d. | 32 | 36 | 1 | 10 | 20 | Croatia banka d.d. | 28 | 24 | 6 | 7 | 16 | Slatinska banka d.d. | 24 | 27 | 2 | 4 | 15 | Imex banka d.d. | 18 | 19 | 5 | 2 | 11 | J&T banka d.d. | 10 | 11 | 9 | 6 | 9 | Samoborska banka d.d. | 10 | 9 | 0 | 6 | 6 |
|--|---|-------------------------|------------|--------------------|---------------|--------------------|---------------|-----------------------|------|------|------|------|------|-----------------------------|------|------|------|------|------|---------------------------------|------|------|------|------|------|-----------------------------|-----|-----|-----|------|-----|----------------|-----|------|-----|-----|-----|-------------------------------|-----|-----|----|-----|-----|------------------|-----|-----|-----|-----|-----|----------------------|----|----|----|----|----|------------------|----|----|---|----|----|-----------------------------------|----|----|----|----|----|---------------|----|----|----|----|----|-----------------------|----|----|---|----|----|--------------------|----|----|---|----|----|---------------------|----|----|----|---|----|------------------------------------|----|----|---|----|----|--------------------|----|----|---|---|----|----------------------|----|----|---|---|----|-----------------|----|----|---|---|----|----------------|----|----|---|---|---|-----------------------|----|---|---|---|---|
| Name of the institution | Size | Substitutability | Complexity | Interconnectedness | Overall Score | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Zagrebačka banka d.d. | 2729 | 2794 | 4124 | 2670 | 3079 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Privredna banka Zagreb d.d. | 2410 | 2192 | 3103 | 1486 | 2298 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Erste&Steiermärkische Bank d.d. | 1728 | 1576 | 1237 | 2842 | 1846 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Raiffeisenbank Austria d.d. | 749 | 913 | 696 | 1357 | 929 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OTP banka d.d. | 927 | 1002 | 488 | 516 | 733 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hrvatska poštanska banka d.d. | 639 | 678 | 40 | 557 | 479 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Addiko Bank d.d. | 264 | 292 | 120 | 117 | 198 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Podravska banka d.d. | 70 | 62 | 21 | 96 | 62 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Agram banka d.d. | 66 | 61 | 9 | 66 | 50 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Istarska kreditna banka Umag d.d. | 81 | 88 | 11 | 20 | 50 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KentBank d.d. | 62 | 63 | 30 | 40 | 49 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Karlovačka banka d.d. | 51 | 46 | 5 | 21 | 31 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Partner banka d.d. | 33 | 36 | 3 | 23 | 24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Banka Kovanica d.d. | 24 | 29 | 20 | 6 | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Wüstenrot stambena štedionica d.d. | 32 | 36 | 1 | 10 | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Croatia banka d.d. | 28 | 24 | 6 | 7 | 16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Slatinska banka d.d. | 24 | 27 | 2 | 4 | 15 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Imex banka d.d. | 18 | 19 | 5 | 2 | 11 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| J&T banka d.d. | 10 | 11 | 9 | 6 | 9 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Samoborska banka d.d. | 10 | 9 | 0 | 6 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.3 Supervisory judgement</p> | <p>Expert judgement complemented the scoring process. It resulted in identification of one additional O-SII, Addiko Bank d.d. This decision was based on:</p> <p>(1) the fact that one (Substitutability) out of four mandatory criteria is still above the threshold (see 4.1.),</p> <p>(2) optional indicators of geographical breakdown of bank's activity point to high importance of the bank in the region of Eastern Croatia, where the bank's share in receivables and deposits remains significant and above the threshold,</p> <p>(3) continuity criteria, taking into account that the bank was designated as an O-SII since the implementation of the framework. While below the threshold for the second year in row, the bank is still distinctively larger in terms of systemic footprint than the next non-O-SII bank (see table in 4.3.).</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.4 Calibrating the O-SII buffer</p> | <p>Along with the scores of systemic importance obtained in the scoring process, HNB uses the equal expected impact approach as recommended by the ESRB Handbook on Operationalising Macro-prudential Policy in the Banking Sector.</p> <p>Potential impact of O-SIIs and non-SIIs in distress is equilibrated via adjusting the probability of distress for O-SII in relation to the probability of distress of a (reference) non-SII based on historical distribution of the ratio of net income to RWAs (return on RWA). Determined O-SII buffer rates are based on the results of the EEI approach, also taking into account indicators of systemic importance, historical losses in the system and expert judgement, in relation to other macroprudential instruments as a segment of a coordinated central bank policy aimed at achieving and maintaining financial stability.</p> <p>Compared to the last year, three buffer rates were changed. Taking into account the decrease of the total score of Addiko Bank d.d. below the threshold, its buffer rate was lowered from 0.5% to 0.25%. The increase of the buffer rate for Hrvatska postanska banka d.d. from 0.5% to 1.0% reflects the increase in its systemic footprint after the acquisition of Nova hrvatska banka d.d. in July 2022. Finally, the buffer rate for the largest Croatian O-SII, Zagrebacka banka d.d. was increased to 2.5% to better align its systemic importance to its score, in relation to other O-SIIs and their buffer rates.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.5 Effectiveness and proportionality of measure</p> | <p>The O-SII buffer rates are proportional to the higher risk that these institutions pose to the financial system due to their size, complexity and importance for the economy.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| 5. Sufficiency, consistency and non-overlap of the policy response | |
|---|--|
| 5.1 Sufficiency of the policy response | Identified O-SI institutions and the level of applied OSII buffers are assessed sufficient to mitigate the systemic risk these banks pose to the stability of the financial system, by ensuring their capital resilience. The buffer levels reflect the systemic importance of each O-SII. |
| 5.2 Consistency of application of the policy response | The O-SII buffers contribute to fulfilling policy objectives outlined in ESRB's Recommendation on intermediate objectives and instruments of macro-prudential policy (ESRB/2013/1). |
| 5.3 Non-overlap of the policy response | No other policy instruments are used to address the same systemic risk. |
| 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 CNB Decision on the Reciprocity of Macroprudential Policy Measures Adopted by Relevant Authorities of Other European Union Member States and Assessment of Cross-border Effects of Macroprudential Policy Measures (OG. 60/2017) provides the framework for the assessment of cross-border effects (leakages and regulatory arbitrage) for the implementation of Croatian macroprudential policy measures in own jurisdiction, in other Member States and on the Single Market, following the Recommendation/2015/2. Results of this assessment show that cross-border effects of the measure are expected to be non-significant.</p> <p>As regards inward spillovers, they are expected to be very limited as all designated O-SIIs have enough management buffers to fulfil the requirement and it is not expected that imposed capital buffers would affect lending activity. The introduced O-SII buffers are expected to have positive outward effects as the higher resilience of Croatian O-SIIs reduces the risk of possible spillovers and contagion to other Member States.</p> |
| 6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State | Leakages and regulatory arbitrage within Croatia are not expected as the measure is applied at the highest applicable level of consolidation. |
| 7. Combinations and interactions with other measures | |

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).

| <p>7.1 Combinations between G-SII and O-SII buffers (Article 131.14)</p> | <p>There are no G-SIIs in Croatia.</p> <table border="1" data-bbox="571 232 1441 376"> <thead> <tr> <th>Name of institution</th> <th>O-SII buffer</th> <th>G-SII buffer</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 institution | O-SII buffer | G-SII buffer | | % | % | | % | % | | % | % | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|--------------------------------------|---|--------------------------------------|-----------------------------------|-------------------------------|-------|--------------------------------------|------------------------|--|--|--------------------------------------|------|-------------------------------------|----------------------------------|--------------------------------------|------|-------------------------------------|------|--------------------------------------|------|---------------------------------|------|--------------------------------------|------|---------------------------------------|------|------------------|------|------------------|------|------------------|-------|--|---|--|---|
| Name of institution | O-SII buffer | G-SII buffer | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | % | % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | % | % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | % | % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <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? 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%? <p>All credit institutions (both O-SIIs and non O-SIIs) in Croatia are subject to a systemic risk buffer. A SyRB rate of 1.5% is applied to all exposures (domestic and foreign), while the O-SII buffer and the SyRB should be maintained on both individual and consolidated level where applicable. The two buffer rates are cumulative and their sum is below 5% for all O-SIIs.</p> <p>For more information, see https://www.hnb.hr/en/core-functions/financial-stability/macprudential-measures/structural-systemic-risk-buffer</p> <p>The table shows the sums of the SyRB rate of 1.5% and calibrated O-SII buffer rates.</p> <table border="1" data-bbox="571 1070 1425 1691"> <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>Zagrebačka banka d.d., Zagreb</td> <td>1.5%</td> <td>Subconsolidated and individual level</td> <td>4.0%</td> </tr> <tr> <td>Erste&Steiermärkische Bank d.d. Rijeka</td> <td>1.5%</td> <td>Subconsolidated and individual level</td> <td>3.5%</td> </tr> <tr> <td>Privredna banka Zagreb d.d., Zagreb</td> <td>1.5%</td> <td>Subconsolidated and individual level</td> <td>3.5%</td> </tr> <tr> <td>Raiffeisenbank Austria d.d., Zagreb</td> <td>1.5%</td> <td>Subconsolidated and individual level</td> <td>3.0%</td> </tr> <tr> <td>OTP banka Hrvatska d.d., Zagreb</td> <td>1.5%</td> <td>Subconsolidated and individual level</td> <td>3.0%</td> </tr> <tr> <td>Hrvatska poštanska banka d.d., Zagreb</td> <td>1.5%</td> <td>Individual level</td> <td>2.5%</td> </tr> <tr> <td>Addiko Bank d.d.</td> <td>1.5%</td> <td>Individual level</td> <td>1.75%</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 | Zagrebačka banka d.d., Zagreb | 1.5% | Subconsolidated and individual level | 4.0% | Erste&Steiermärkische Bank d.d. Rijeka | 1.5% | Subconsolidated and individual level | 3.5% | Privredna banka Zagreb d.d., Zagreb | 1.5% | Subconsolidated and individual level | 3.5% | Raiffeisenbank Austria d.d., Zagreb | 1.5% | Subconsolidated and individual level | 3.0% | OTP banka Hrvatska d.d., Zagreb | 1.5% | Subconsolidated and individual level | 3.0% | Hrvatska poštanska banka d.d., Zagreb | 1.5% | Individual level | 2.5% | Addiko Bank d.d. | 1.5% | Individual level | 1.75% | | % | | % |
| Name of institution | SyRB rate | SyRB application level | Sum of G-SII/O-SII and SyRB rates | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Zagrebačka banka d.d., Zagreb | 1.5% | Subconsolidated and individual level | 4.0% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Erste&Steiermärkische Bank d.d. Rijeka | 1.5% | Subconsolidated and individual level | 3.5% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Privredna banka Zagreb d.d., Zagreb | 1.5% | Subconsolidated and individual level | 3.5% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Raiffeisenbank Austria d.d., Zagreb | 1.5% | Subconsolidated and individual level | 3.0% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OTP banka Hrvatska d.d., Zagreb | 1.5% | Subconsolidated and individual level | 3.0% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hrvatska poštanska banka d.d., Zagreb | 1.5% | Individual level | 2.5% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Addiko Bank d.d. | 1.5% | Individual level | 1.75% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | % | | % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)</p> | <p>The cap for the subsidiary does not prevent the implementation of the designated O-SII buffer rates based on the domestic buffer setting methodology.</p> <table border="1" data-bbox="571 1783 1425 2022"> <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>Zagrebačka banka d.d., Zagreb</td> <td>UniCredit S.p.A.</td> <td>1.50%</td> </tr> <tr> <td>Privredna banka Zagreb d.d., Zagreb</td> <td>Intesa Sanpaolo S.p.A.</td> <td>1.25%</td> </tr> <tr> <td>Erste&Steiermärkische Bank d.d. Rijeka</td> <td>Erste Group Bank AG</td> <td>1.5%</td> </tr> <tr> <td>Raiffeisenbank Austria d.d., Zagreb</td> <td>Raiffeisen Bank International AG</td> <td>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 | Zagrebačka banka d.d., Zagreb | UniCredit S.p.A. | 1.50% | Privredna banka Zagreb d.d., Zagreb | Intesa Sanpaolo S.p.A. | 1.25% | Erste&Steiermärkische Bank d.d. Rijeka | Erste Group Bank AG | 1.5% | Raiffeisenbank Austria d.d., Zagreb | Raiffeisen Bank International AG | 1.5% | | | | | | | | | | | | | | | | | | | | | |
| Name of O-SII subsidiary | Name of the EU parent of the O-SII subsidiary | Buffer applicable to O-SII EU parent | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Zagrebačka banka d.d., Zagreb | UniCredit S.p.A. | 1.50% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Privredna banka Zagreb d.d., Zagreb | Intesa Sanpaolo S.p.A. | 1.25% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Erste&Steiermärkische Bank d.d. Rijeka | Erste Group Bank AG | 1.5% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Raiffeisenbank Austria d.d., Zagreb | Raiffeisen Bank International AG | 1.5% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | |
|---|--|----------------|----|
| | OTP banka Hrvatska d.d., Zagreb | OTP Bank Nyrt. | 2% |
| 8. Miscellaneous | | | |
| 8.1 Contact person(s)/mailbox at notifying authority | Ms. Lana Ivicic Financial Stability Department Hrvatska narodna banka Phone: +385 1 456 50 09 E-mail: lana.ivicic@hnb.hr | | |
| 8.2 Any other relevant information | Not for publication before 25 November 2023 | | |
| 8.3 Date of the notification | Please provide the date on which this notification was uploaded/sent. 23/10/2023 | | |