

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

Template for notifying the ECB and the ESRB on setting or resetting on O-SII buffer under Article 131(7) CRD and on the identification 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 SSM Regulation¹);
- [DARWIN/ASTRA link] when notifying the ESRB.

The ESRB will forward this notification to the European Commission, to 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 after the relevant authorities have adopted and published the notified macroprudential measure².

Uploading/emailing this template to the above-mentioned addresses constitutes an official notification, no further official letter is required. In order to facilitate the work of the notified authorities, please send the notification template in a format that allows electronically copying the information.

1. Notifying national authority													
1.1 Name of the notifying authority	If several designated authorities, please mention all of them. Banka Slovenije												
1.2 Country of the notifying authority	Please provide the country of the notifying authority. Slovenia												
2. Description of the measure													
2.1a Concerned institution or group of institutions	<p>On which institution(s) is the measure applied (name and LEI code)?</p> <p>Is the measure applied on:</p> <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>NOVA LJUBLJANSKA BANKA d.d., Ljubljana (NLB)</td> <td>5493001BABFV7P27OW30</td> <td>Consolidated level</td> </tr> <tr> <td>NOVA KREDITNA BANKA MARIBOR d.d. (NKBM)</td> <td>549300J0GSZ83GTKBZ89</td> <td>Consolidated level</td> </tr> <tr> <td>SID - Slovenska izvozna in razvojna banka, d.d., Ljubljana (SID)</td> <td>549300BZ3GKOJ13V6F87</td> <td>Individual level</td> </tr> </tbody> </table>	Name of institution	LEI	Consolidation level	NOVA LJUBLJANSKA BANKA d.d., Ljubljana (NLB)	5493001BABFV7P27OW30	Consolidated level	NOVA KREDITNA BANKA MARIBOR d.d. (NKBM)	549300J0GSZ83GTKBZ89	Consolidated level	SID - Slovenska izvozna in razvojna banka, d.d., Ljubljana (SID)	549300BZ3GKOJ13V6F87	Individual level
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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 The notifying authority may request, and the Head of the ESRB Secretariat may approve, that for reasons of confidentiality or financial stability this notification or part of it should not be published.

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2.1b Changes in the list of concerned institutions	<p>Please indicate any changes in the list under 2.1a compared to the last notification, and provide an explanation, if applicable.</p> <p>Selling its UC Leasing company in July this year, Unicredit banka has undergone a status change. Thereafter the bank is obliged to comply with the requirements on an individual basis instead a consolidated one.</p>																								
2.2 Level of the buffer applied	<p>What is the level of the buffer (in %) applied to the institution(s)?</p> <table border="1"> <thead> <tr> <th>Name of institution</th> <th>Fully phased in buffer level</th> <th>Change compared to last notification</th> </tr> </thead> <tbody> <tr> <td>NLB</td> <td>1.25%</td> <td></td> </tr> <tr> <td>NKBM</td> <td>0.75%</td> <td></td> </tr> <tr> <td>SID</td> <td>0.50%</td> <td></td> </tr> <tr> <td>UniCredit</td> <td>0.50%</td> <td></td> </tr> <tr> <td>SKB</td> <td>0.25%</td> <td></td> </tr> <tr> <td>Banka Intesa Sanpaolo</td> <td>0.25%</td> <td></td> </tr> </tbody> </table>	Name of institution	Fully phased in buffer level	Change compared to last notification	NLB	1.25%		NKBM	0.75%		SID	0.50%		UniCredit	0.50%		SKB	0.25%		Banka Intesa Sanpaolo	0.25%				
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2.3 Name of the EU ultimate parent institution	<p>Please provide the name and the LEI code of the EU ultimate parent institution of the group of each of the identified O-SIIs, in case the EU ultimate parent institution is not the concerned institution itself.</p> <table border="1"> <thead> <tr> <th>Name of identified O-SII</th> <th>EU ultimate parent institution</th> <th>LEI of ultimate parent institution</th> </tr> </thead> <tbody> <tr> <td>NKBM</td> <td>Biser Topco S.A R.L.</td> <td>222100ZXZ9BRGDMKXL75</td> </tr> <tr> <td>SKB</td> <td>OTP Bank Nyrt.</td> <td>529900W3MOO00A18X956</td> </tr> <tr> <td>Unicredit</td> <td>UniCredit S.p.a.</td> <td>549300TRUWO2CD2G5692</td> </tr> <tr> <td>Intesa Sanpaolo</td> <td>Intesa Sanpaolo S.p.a.</td> <td>2W8N8UU78PMDQKZENC08</td> </tr> </tbody> </table>	Name of identified O-SII	EU ultimate parent institution	LEI of ultimate parent institution	NKBM	Biser Topco S.A R.L.	222100ZXZ9BRGDMKXL75	SKB	OTP Bank Nyrt.	529900W3MOO00A18X956	Unicredit	UniCredit S.p.a.	549300TRUWO2CD2G5692	Intesa Sanpaolo	Intesa Sanpaolo S.p.a.	2W8N8UU78PMDQKZENC08									
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2.4 Names of subsidiaries	<p>If any of the identified O-SIIs is a parent institution and the buffer is applied on a (sub)consolidated level, please name the subsidiaries of the institution that are notified as O-SIIs (please give name and LEI code).</p> <p>Not applicable</p> <table border="1"> <thead> <tr> <th>Name of identified parent O-SII</th> <th>Name of O-SII subsidiary</th> <th>LEI of O-SII subsidiary</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> <tr><td></td><td></td><td></td></tr> <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 identified parent O-SII	Name of O-SII subsidiary	LEI of O-SII subsidiary																					
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3.1 Timing of the decision	<p>What is the date of the official decision? <u>For SSM countries when notifying the ECB</u>: provide the date when the decision referred to in Article 5 of the SSMR shall be taken.</p> <p>19/10/2023</p>																								
3.2 Timing of the publication	<p>What is the date of publication of the notified measure?</p> <p>01/12/2023</p>																								

<p>3.3 Disclosure</p>	<p>Information about the communication strategy of the notified measure to the market.</p> <p>The Bank of Slovenia will publish the list of designated institutions and the applicable O-SII buffer requirement on its website.</p> <p>If available, please provide a link to the public announcement.</p> <p>The list of designated O-SIIs will be updated on the website of Banka Slovenije in the first week of December, 2023.</p>																																										
<p>3.4 Timing of application</p>	<p>What is the intended date of activation (i.e. as of which date shall the measure be applicable)?</p> <p>01/01/2024</p>																																										
<p>3.5 Phasing in</p>	<p>What is the intended timeline for the phase-in of the measure?</p> <p>This year's O-SII identification and buffer calibration process resulted in increase of the buffer rate for three banks (NKBM, SID and Unicredit) for 0.25 p.p. The banks will be given 12-months phase-in period to meet the new capital requirements. They are expected to hold the fully phased in O-SII buffers rate on 1st January 2025.</p> <table border="1" data-bbox="560 808 1430 954"> <thead> <tr> <th>Name of institution</th> <th>01/01/2025</th> <th></th> <th></th> <th></th> <th></th> </tr> </thead> <tbody> <tr> <td>NKBM</td> <td>0.75%</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>SID</td> <td>0.50%</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Unicredit banka</td> <td>0.50%</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Name of institution	01/01/2025					NKBM	0.75%					SID	0.50%					Unicredit banka	0.50%																						
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<p>3.6 Review of the measure</p>	<p>When will the measure be reviewed (Article 131(6) and 131(12) specify that the buffer, the identification of O-SIIs and the allocation into subcategories must be reviewed at least annually)?</p> <p>The list of designated institutions as well as the applicable buffer levels will be reviewed on an annual basis (Article 242 of the Banking Act (ZBan-3) valid as of 23 July 2021.)</p>																																										
<p>4. Reason for O-SII identification and activation of the O-SII buffer</p>																																											
<p>4.1 Scores of concerned institution or group of institutions, as per EBA guidelines on the assessment of O-SIIs (Article 131.3)</p>	<p>Please list here the name, overall scores and category scores of the identified O-SIIs related to</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="560 1619 1430 1906"> <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>NLB</td> <td>1024</td> <td>707</td> <td>1382</td> <td>762</td> <td>3875</td> </tr> <tr> <td>NKBM</td> <td>439</td> <td>493</td> <td>193</td> <td>554</td> <td>1678</td> </tr> <tr> <td>SID</td> <td>109</td> <td>45</td> <td>146</td> <td>493</td> <td>793</td> </tr> <tr> <td>Unicredit Banka</td> <td>140</td> <td>243</td> <td>410</td> <td>72</td> <td>864</td> </tr> <tr> <td>SKB</td> <td>186</td> <td>262</td> <td>146</td> <td>110</td> <td>705</td> </tr> <tr> <td>Intesa Sanpaolo</td> <td>158</td> <td>178</td> <td>93</td> <td>119</td> <td>548</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	NLB	1024	707	1382	762	3875	NKBM	439	493	193	554	1678	SID	109	45	146	493	793	Unicredit Banka	140	243	410	72	864	SKB	186	262	146	110	705	Intesa Sanpaolo	158	178	93	119	548
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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 We followed the EBA methodology for computing the systemic importance scores. The analysis includes all banks in Slovenia. b. which threshold score has been set to identify O-SIIs Banka Slovenije applies a threshold of 500 basis points in the process of identification of O-SIIs. This year six institutions with scores above 500 basis points have been identified as O-SIIs. The measure will be applied at the highest level of consolidation in Slovenia (dependant on individual bank whether this indicates solo, subconsolidated or consolidated level). c. whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process No credit institutions have been excluded from the assessment. The identification process covers the entire Slovene banking system and the assessment follows the mandatory indicators set as proposed in the EBA's Guidelines (EBA/GL/2014/10). d. names and scores of all relevant entities not excluded from the identification process (could be sent in a separate excel file, see 4.1) NA e. whether non-bank institutions have been included in the calculations No non-bank institution has been included in the calculations. 												
<p>4.3 Supervisory judgement</p>	<p>Has any of the institutions listed in 2.1 been identified through 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 supervisory assessment decisions, if any, and what are the scores 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>No institution has been identified as an O-SII through supervisory judgement.</p>												
<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.</p> <p>At its 707th meeting on 18 July 2023, the Governing Council of Banka Slovenije adopted a new Regulation on Determining the capital buffer for other systemically important banks, which was published in the Official Gazette of the Republic of Slovenia (Official Gazette of the RS No 79/23 of 21 July 2023). As of the date of the entry into force of the new Regulation, the previous Regulation on Determining the capital buffer for other systemically important banks (Official Gazette of the RS No 96/15 and 68/17) will cease to be in force. Banka Slovenije applies the new framework for setting O-SII buffer rates (table below) in this year's annual exercise of O-SIIs identification and calibration of O-SII buffer rates.</p> <table border="1" data-bbox="555 1803 1078 2027"> <thead> <tr> <th>Score</th> <th>Capital buffer</th> </tr> </thead> <tbody> <tr> <td>500–749</td> <td>0.25%</td> </tr> <tr> <td>750–1299</td> <td>0.50%</td> </tr> <tr> <td>1300–1949</td> <td>0.75%</td> </tr> <tr> <td>1950–2699</td> <td>1.00%</td> </tr> <tr> <td>2700–4449</td> <td>1.25%</td> </tr> </tbody> </table>	Score	Capital buffer	500–749	0.25%	750–1299	0.50%	1300–1949	0.75%	1950–2699	1.00%	2700–4449	1.25%
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<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.</p> <p>The failure of a systemic institution could have severe negative impact on the financial system and the real economy. To prevent such events, a capital surcharge is applied to institutions that bear a significant systemic importance and can therefore create higher risks to financial stability. More precisely, the aim of the O-SII buffer is to increase the loss-absorbing capacity of such institutions. In the Slovenian banking system, the six identified O-SIIs represent 82% of the system’s total assets.</p>		
<p>5 Sufficiency, consistency and non-overlap of the policy response</p>			
<p>5.1 Sufficiency of the policy response</p>	<p>In order for macroprudential policy to be considered as ‘sufficient’, the policy responses are expected 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 for assessing the sufficiency of the macroprudential policy in the Member States. Please provide any additional information that the ESRB should consider during its assessment of the sufficiency of the policy response.</p> <p>In the context of policy sufficiency, the measure is calibrated in a way that it meets the policy objective (to limit the systemic impact of misaligned incentives with a view to reducing moral hazard and to additionally reduce externalities caused by interconnectedness) and that it ensures that benefits exceed costs (see 4.4. for calibration approach).</p> <p>Bank of Slovenia meaningfully uses the EBA methodology to regularly identify O-SIIs and to assess their importance to the financial system. The reason for the special treatment of O-SIIs is that their failure may endanger financial stability, which may lead to significantly larger adverse effects on the financial system and the entire economy compared to failure of systemically less significant institution (please also see 4.5). Other systemically important institutions are identified based on the size, importance, complexity and, cross-border activity, and interconnectedness. The capital buffer for each identified O-SII is set accordingly. In addition, the Bank of Slovenia is currently developing a framework for assessing macroprudential stance that would further provide additional insights regarding the sufficiency of the policy response.</p>		
<p>5.2 Consistency of the application of the policy response</p>	<p>In order for macroprudential policy to be considered as ‘consistent’, the policy instruments should follow their relevant objective as outlined in ESRB/2013/1 and they should be implemented in accordance with the common principles detailed within the relevant legal text.</p> <p>Note that the ESRB assessment of consistency will incorporate whether the same systemic risks are addressed in a similar way both across and within the Member States over time. Please provide any additional information that the ESRB should consider during its assessment of the consistency of the policy response.</p> <p>The O-SII buffer presents an additional capital buffer requirement for banks</p>		

	<p>that are designated as O-SIIs. The objective of the surcharge is to enhance these institutions' loss-absorption capacity. This reduces both the probability of stress events and their potential impact. The main channel that the transmission works through is through reduction of the moral hazard in O-SIIs and the implicit subsidy they may enjoy by helping to ensure that creditors, rather than third parties such as national governments, bear losses in the event of a bank's failure (see also 5.1).</p>
<p>5.3 Non-overlap of the policy response</p>	<p>In order for a policy instrument to be considered as 'non-overlapping', it should aim to address a systemic risk that either differs to the risk addressed by other active tools in the same Member State, or to be complementary to another tool in that Member State which addresses the same systemic risk.</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 necessity to use more than one instrument to address the same systemic risk and how the different instruments interact with each other. <p>No other policy instruments used to address the same systemic risk.</p>
<p>6 Cross-border and cross-sector impact of the measure</p>	
<p>6.1 Assessment of cross-border effects and the likely impact on the internal market (Recommendation ESRB/2015/2)</p>	<p>Assessment of the cross-border effects of the 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 Macro-prudential Policy in the Banking Sector³ 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.</p> <p>a.1. (cross-border) risk adjustment: in order to avoid being designated as an O-SII, financial service providers might reduce their exposures outside Slovenia.</p> <p>a.2. regulatory arbitrage: in order to avoid the O-SII buffer requirement, foreign financial service providers might:</p> <p>a.2.1. convert their subsidiaries in Slovenia into branches: the probability of this to happen is small as long as the size of exposures to Slovenia of these foreign financial service providers remains small compared to their total exposures;</p> <p>a.2.2. transfer capital-intensive activities (like derivatives) to special purpose vehicles: in our case, since the measure applies to the highest level of consolidation, the risk of cross-border effects through this channel is assessed as non-material.</p> <p>b. Assessment of:</p> <p>b.1. cross-border effects of the implementation of the measure in your own jurisdiction (inward spillovers);</p> <p>b.1.1. Since a higher capital buffer means a higher cost of lending for banks, an O-SII might transfer this higher cost to borrowers, who in turn might redirect their borrowing request abroad. Should this happens, the inward effect for Slovenia would be positive, because it contributes towards</p>

³ Available on the ESRB's website at www.esrb.europa.eu.

the reduction of the systemic importance of that O-SII. Consequently, the measure becomes more effective at limiting moral hazard by too-big-to-fail institutions.

b.1.2. An O-SII might (want to) countervail a potential contraction in lending (see point b.1.1 above) by increasing other (and maybe riskier and more complex) types of exposures, like riskier foreign exposures with higher expected profits. However, the criteria for O-SII designation take into account the bank's increase in complexity and expansion of cross-border activity. Therefore, we can overall expect that the described cross-border effect would be non-material.

b.1.3. The measure creates incentives for capital regulatory arbitrage, i.e. conversion of subsidiaries of foreign financial service providers into branches. As mentioned in point a.2.1 above, the probability that foreign financial service providers will convert their subsidiaries in Slovenia into branches is assessed to be currently negligible.

b.2. cross-border effects on other Member States and on the Single Market of the measure (outward spillovers);

b.2.1. The introduced O-SII buffer will bring about positive outward effects as the reduced risk of financial instability in Slovenia will also reduce the risk of possible contagion to other countries, whose financial systems or economies are, for any reason, connected.

b.2.2. In order to avoid the O-SII buffer requirement, foreign financial service providers might transfer capital-intensive activities (like derivatives) to special purpose vehicles: in our case, since the measure applies to the highest level of consolidation, the risk of cross-border effects through this channel is assessed as non-material.

b.3. overall impact on the Single Market of the implementation of the measure.

b.3.1. Summing up the information provided in the previous bullet points, the overall impact on the Single Market of the implementation of the measure is positive. The measure helps reduce the issues related to moral hazard by too-big-to-fail institutions, direct and indirect contagion (by restraining O-SIIs' foreign and riskier exposures) and to increase the O-SIIs' resilience.

b.3.2. Finally, the Bank of Slovenia monitors regularly whether there is any significant change in cross-border exposures that could constitute or signal negative inward or outward effects of the considered measure. In particular, in light of the criteria and expert judgement described above, the amount of borrowing from abroad by households and NFCs is monitored as an indicator of cross-border effects of the OSII buffer. The following table shows no significant change in this indicator that would signal the existence of negative cross-border effects.

	millions
date	EUR
2015-Q4	2665.52
2016-Q4	2458.22
2017-Q4	2377.6

		2018-Q4	2082.01													
		2019-Q4	2179.57													
		2020-Q4	2018.24													
		2021-Q4	2055.59													
		2022-Q4	2138.52													
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)?</p> <p>Is there scope for "leakages and regulatory arbitrage" in other jurisdictions?</p> <p>Some of the banks identified as O-SIIs are subsidiaries of parent institutions from other countries. The measure will be applied at the highest level of consolidation in Slovenia in order to prevent circumvention i.e. shifting of business activities within the group. Leakages are therefore not expected. Moreover, as explained in section 6.1, the risk of regulatory arbitrage is deemed negligible.</p>															
7 Combinations and interactions with other measures																
7.1 Combinations between G-SII and O-SII buffers (Article 131.14)	<p>In case both G-SII and O-SII criteria applied to the same institution at the consolidated level, which of the two buffers is the highest?</p> <p>Not applicable, as no bank in Slovenia is subject to both an O-SII and G-SII buffer on a consolidated basis.</p>															
7.2 Combinations with SyRB (Article 131.15)	<p>Are any of the institutions, identified as O-SIIs, subject to a systemic risk buffer?</p> <p>If yes, please provide the following information:</p> <ol style="list-style-type: none"> What is the size of the systemic risk buffer rates(s)? What is the level of application on the systemic risk buffer rate(s) (i.e. level of consolidation and/or individual)? Is the sum of the systemic risk buffer rate(s) and the O-SII buffer rate to which the same institution is subject to higher than 5 %? <p>The requirement to maintain a sectoral systemic risk buffer is introduced for all banks in relation to sectoral exposures in the Republic of Slovenia referred to in the first and second indents of point 4 of the first paragraph of Article 247 of the Banking Act, in the following amount:</p> <ul style="list-style-type: none"> 1.0 % for all retail exposures to natural persons secured by residential immovable property; 0.5 % for all other exposures to natural persons. <p>Banks comply with the requirement to maintain a systemic risk buffer from 1 January 2023.</p> <p>The measure is applied at the highest level of consolidation in Slovenia (dependant on individual bank whether this indicates solo, subconsolidated or consolidated level).</p> <p>There is no case where the sum of the systemic risk buffer rate(s) and the O-SII buffer rate to which the same institution is subject to exceeds 5 % (please refer to the table below).</p> <table border="1"> <thead> <tr> <th>Name of institution</th> <th>SyRB rate</th> <th>SyRB level of application</th> <th>Sum of O-SII and SyRB rates</th> </tr> </thead> <tbody> <tr> <td>NLB</td> <td>1.0 % and 0.5 %</td> <td></td> <td>2.75 %</td> </tr> <tr> <td>NKBM</td> <td>1.0 % and 0.5 %</td> <td></td> <td>2.25 %</td> </tr> </tbody> </table>				Name of institution	SyRB rate	SyRB level of application	Sum of O-SII and SyRB rates	NLB	1.0 % and 0.5 %		2.75 %	NKBM	1.0 % and 0.5 %		2.25 %
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7.3 O-SII requirement for a subsidiary (Article 131.8)	<p>In case the O-SII is a subsidiary of an EU parent institution which is subject to a G-SII or O-SII buffer on a consolidated basis, what is the G-SII or O-SII buffer rate on a consolidated basis of the parent institution?</p> <p>Is the subsidiary cap preventing the implementation of a higher O-SII buffer according to the domestic buffer setting methodology?</p> <p>There are no obstacles to the implementation of the set buffer rates for the O-SII in the table</p> <table border="1"> <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>NKBM</td> <td>Biser Topco S.A R.L.</td> <td>N/A</td> </tr> <tr> <td>SKB</td> <td>OTP Bank Nyrt.</td> <td>1.00%</td> </tr> <tr> <td>Unicredit</td> <td>UniCredit S.p.a.</td> <td>1.00%</td> </tr> <tr> <td>Intesa Sanpaolo</td> <td>Intesa Sanpaolo S.p.a.</td> <td>0.75%</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	NKBM	Biser Topco S.A R.L.	N/A	SKB	OTP Bank Nyrt.	1.00%	Unicredit	UniCredit S.p.a.	1.00%	Intesa Sanpaolo	Intesa Sanpaolo S.p.a.	0.75%	
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8 Miscellaneous																	
8.1 Contact person(s)/mailbox at notifying authority	<p>Contact person(s) (name, phone number and e-mail address) and mailbox for further inquiries.</p> <p>Meta Ahtik, tel.: +386 1 47 19 350, email: meta.ahtik@bsi.si</p> <p>Monika Tepina, tel.: +386 1 47 19 369, email: monika.tepina@bsi.si</p> <p>Marija Drenkovska, tel.: +386 1 47 19 678, email: marija.drenkovska@bsi.si</p>																
8.2 Any other relevant information	/																
8.3 Date of the notification	<p>Please provide the date when this notification was uploaded/sent.</p> <p>05/10/2023</p>																