



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);
- <u>DARWIN/ASTRA</u> 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.

Notifying national au	1		
1.1 Name of the notifying authority	Latvijas Banka.		
1.2 Country of the notifying authority	Latvia.		
2. Description of the me	easure		
	Name of institution	LEI LEI	Consolidation level
2.1a Institution or group of	Name of institution Swedbank Baltics AS	LEI 9845006C7B5CC707X660	Consolidation level Highest level of consolidation in Latvia and sub-consolidated and individual level in Latvia (subsidiary "Swedbank" AS)
2.1a Institution or group of institutions concerned			Highest level of consolidation in Latvia and sub-consolidated and individual level in Latvia
	Swedbank Baltics AS	9845006C7B5CC707X660 549300YW95G1VBBGGV0	Highest level of consolidation in Latvia and sub-consolidated and individual level in Latvia (subsidiary "Swedbank" AS) Highest level of

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).

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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.

	BluOr Bank AS 54930080G2M7EJ097A27		Highest level of consolidation in Latvia	
	The same E institutions I	have been identified as in 202	2. The conditions for the	
		ion levels also remain unchan		
2.1b Changes to the list of	* *	ontinues to apply also to its sul	•	
institutions concerned		subsidiary registered in Latvi	•	
	3	on of the capital stack (includi Il as to take into account the lo	-	
	- ,			
	-	usly set requirements the buffociju sabiedrība "Citadele banl	-	
		e no changes in the application		
	(as described in Section	2.1b).		
	Name of institution	New O-SII buffer	Previous O-SII buffer	
2.2 Level of the buffer	Swedbank Baltics AS	2%	2%	
applied	AS "SEB banka"	1.75%	1.75%	
	Akciju sabiedrība "Citadele banka"	1.50%	1.75%	
	Akciju sabiedrība "Rietumu Banka"	0.50%	0.75%	
	BluOr Bank AS	0.25%	0.25%	
	Name of identified O-SII Ultimate EU parent institution		LEI of ultimate parent institution	
	Swedbank Baltics AS	Swedbank AB	M312WZV08Y7LYUC71685	
2.3 Name of the ultimate EU	AS "SEB banka"	Skandinaviska Enskilda Banker	F3JS33DEI6XQ4ZBPTN86	
parent institution		AB		
	Name of parent O-SII identified	Name of O-SII subsidiary	LEI of O-SII subsidiary	
	Swedbank Baltics AS	"Swedbank" AS	549300FXBIWWGK7T0Y98	
2.4 Names of subsidiaries	Swedbank Baltics AS	Swedbank AS	549300PHQZ4HL15HH975	
	Swedbank Baltics AS	"Swedbank", AB	549300GH3DFCXVNBHE59	
3. Timing for the measur	e			
09/12/2024				
3.1 Timing for the decision	Planned			

3.2 Timing for publication	11/12/2024					
3.3 Disclosure	The respective publication will be made in Latvijas Banka home page: https://www.bank.lv/en/operational-areas/financial-stability/macroprudential-measures-introduced-in-latvia/capital-buffer-for-other-systemically-important-institutions					
3.4 Timing for application	16/12/2024					
	Not applicable as the rates	for both instit	utions are	decreasing	J. Date4	Date5
		16/12/2024				
	Swedbank Baltics AS	2%	%	%	%	%
	AS "SEB banka"	1.75%	%	%	%	%
3.5 Phasing in	Akciju sabiedrība "Citadele banka"	1.50%				
	Akciju sabiedrība "Rietumu Banka"	0.50%				
	BluOr Bank AS	0.25%				
3.6 Review of the measure	The list of the identified O-SIIs and the respective O-SII buffer rates are reviewed on an annual basis.					

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

The O-SII scores for all institutions included in the identification exercise and their respective contributions of each indicator are available in the Excel file attached below the table. These scores are calculated strictly according to the definitions provided in the EBA guidelines EBA/GL/2014/10 (EBA Guidelines).

Taking into account that Swedbank Baltics AS is an intermediate holding company established to create a Baltic sub-consolidation group, which doesn't on its own behalf offer financial services nor attract deposits, and its formation represents an organisational change withing the Swedbank Group but in itself has no practical effect on the systemic importance of "Swedbank" AS or other institutions included in the O-SII identification sample for the Latvian financial sector, just as in 2023, it has been identified on the basis of supervisory reporting data of "Swedbank" AS in 2024 as well.

4.1 Scores of institutions or group of institutions concerned, as per EBA guidelines on the assessment of O-SIIs

(Article 131.3 CRD)

N.B. The information in the table below and the attached file can be shared with other relevant authorities but in general should not be made publicly available. In light of specificities of the Latvian financial sector the harmonised indicator weights as per the EBA Guidelines do not correspond to their actual contribution to systemic risk, therefore resulting in scores that do not appropriately reflect the relative systemic importance of financial sector participants.

Name of institution	Size	Substitut- ability	Com- plexity	Intercon- nectedness	Overall Score
Swedbank Baltics AS	854	780	449	651	2734
AS "SEB banka"	508	405	330	486	1730
Akciju sabiedrība "Citadele banka"	404	502	379	876	2160
Akciju sabiedrība "Rietumu Banka"	120	95	438	62	715

	BluOr Bank AS	83	80	304	132	600	
	O-SII_data_2024.xlsx						
	Please provide information on: a. whether you followed the EBA guidelines on the assessment of O						
	a. whether you The O-SII identification indicators, data definit Guidelines.	n was perforr	ned accordi	ng to the ma	andatory crit	eria and	
	b. which thresh The threshold score h specificities of the fina	as been set a		-		e and	
4.2 Methodology and indicators used for designation of the O-SII	 c. whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process; Relevant entities with total assets not in excess of 0.02% of the whole sample are also included. 						
(Article 131.3)	This is the case of the	_					
(Altiolo lollo)	operation of a credit in https://www.bank.lv/er		-		-		
	indexo-banka-receives						
	d. the names and scores of all relevant entities not excluded from identification process (could be sent in a separate Excel file, sometimes are the Excel file attached in Section 4.1.						
	e. whether non-	-bank instituti	ons have be	en included	d in the calcu	ılations.	
	Non-bank institutions have not been included in the calculations as they are						
	relatively small and are not material in terms of systemic importance in Latvian financial system.						
	Have any of the institution judgement as laid down			=		=	
	No.						
4.2 Suponvisony judgoment	If yes, please list the respective institutions and provide information on:						
4.3 Supervisory judgement	 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. 						

The calibration is based on the *equal expected impact* method wherein the size of the O-SII buffers is set with aim to equalize the expected impact of an O-SIIs' financial distress with the expected impact of a non-O-SII reference institution's financial distress.

In line with the chosen threshold used for the O-SII identification, systemic importance score of 425 basis points is used to define a non-O-SII reference institution. For purposes of calibrating the O-SII buffer, since 2016 the systemic importance scores have been calculated by employing an adjusted EBA Guidelines' methodology which takes into account the specificities of national financial sector. In 2018 the weighting of adjusted indicators used for the O-SII buffer calibration was changed (see the table below) due to the decrease in the outstanding stock of debt securities issued by the banking sector and significant structural changes in the Latvian financial sector.

Adjusted methodology

FRΔ

Adjusted

for buffer methodology for Criterion Indicators guidelines calibration buffer calibration weights weights (2018-) weights (2016-2017) Total assets 25% 25% 25% Size Risk weighted assets 15% 15% Value of domestic payment 8.33% 5% 5% transactions Private sector deposits 8.33% 5% 5% from depositors in the EU Private sector loans to 8.33% 5% 5% recipients in the EU Importance (including Private sector deposits substitutability/financial 5% 7.5% from Latvian residents system infrastructure) Private sector loans to 7.5% 5% Latvian residents Credit risk stress test additional provisions (% of 5% 5% total provisions needed in banking sector) Value of OTC derivatives 8.33% 5% 5% (notional) Complexity/cross-border Cross-jurisdictional activity 8.33% 5% 5% liabilities 8.33% 5% 5% Cross-jurisdictional claims Intra-financial system 8.33% 4.5% liabilities

4.4 Calibrating the O-SII buffer

In order to achieve an equal expected impact of financial distress, the probability of default (PD) of financial distress of O-SII must be lower than that of non-O-SII, as financial distress of O-SIIs leads to higher associated economic costs. These costs are decreased by applying O-SII buffers that lower PDs of O-SIIs.

8.33%

8.33%

5%

5%

4.5%

1%

Intra-financial system

assets

Debt securities outstanding

Quarterly data for period of 2004-2024 (up until Q2) on return on risk weighted assets (RORWA) of banks operating in Latvia was used to determine the PD of a reference non-O-SII.

The table below compares the identified institutions' O-SII scores (i) according to the EBA Guidelines methodology and (ii) according to the adjusted indicators used for the O-SII buffer calibration.

Interconnectedness

		0.611.5555				
		O-SII score according to the	O-SII score according to the			
	Bank	EBA Guidelines	according to the adjusted	Difference (bps)		
		methodology (bps)	indicators (bps)			
	Swedbank Baltics AS	2 734	3 184	450		
	AS "SEB banka"	1 730	2 008	279		
	Akciju sabiedrība "Citadele banka"	2 160	1 711	-449		
	Akciju sabiedrība "Rietumu Banka"	715	751	36		
	BluOr Bank AS	600	486	-114		
	The higher capital requirements resulting from the application of the O-SI					
	are essential to ensure the					
	Latvia. The total assets of the			•		
4.5.566 . 4	sector assets and 57% of L					
4.5 Effectiveness and	institutions would negatively	/ апест ппапскаг s	tability and econor	my of Latvia.		
proportionality of measure	As of 2024 Q2 the identified	d O-SIIs are able	to fulfil the buffer re	equirements with		
	the available CET 1 capital	-	-			
	system or economy are exp	ected. For phase	-in aspects please	see Sections 3.4		
	and 3.5.					
5. Sufficiency, consisten	ւ cy and non-overlap of the բ	policy response				
	The Latvian aconomy relies	boavily on the fir	eancing provided b	y the local hanking		
	The Latvian economy relies heavily on the financing provided by the local banking sector therefore its resilience is essential for financial stability and economic					
	development.					
5.1 Sufficiency of the policy						
response	For institutions with O-SII b					
	considering their relative calculated according to the	•				
	proportional resilience acco	-		-		
	of Swedbank Baltics AS the		· · · · · · · · · · · · · · · · · · ·			
	O-SII buffer rate allowed according to the EU legislation (CRD subsidiary cap).					
	Setting of O-SII buffers to increase the resilience of systemically important					
	institutions is consistent with the aim of limiting the potential risks stemming from					
	a failure of identified O-SIIs for the Latvian financial system. In application of the					
5.2 Consistency of	measure Latvijas Banka has adhered to the principles set out in Article 131 of CRD					
application of the policy	and EBA Guidelines. The O-SII buffers were calibrated relative to their systemic importance – banks with higher adjusted O-SII score are required to hold higher					
response	buffers.					
	No other policy instruments	are used to addr	ess the systemic ri	sk in Latvian		
	banking sector in relation to banks' systemic importance, therefore there is no					
	overlap with other policy instruments.					
5.3 Non-overlap of the policy response						
O O O O O O O O O O O O O O O O O O O						
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)	The cross-border effects and impact on the internal market is expected to be non-material as the cross-border activities within EU of identified O-SIIs are rather limited. The EU parent institutions of local subsidiaries identified as O-SIIs are required to hold at least as large capital buffers on the consolidated level as Latvijas Banka is planning to set in Latvia for these respective institutions if considering the sum of their locally set SyRB and O-SII buffers. In case for Swedbank Baltics AS its three subsidiaries in Baltic States are required to hold				
	the same 2% O-SII buffer.				
6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State	As the measure is institution-specific and applied at the highest consolidation level in Latvia (for considerations regarding Swedbank, please see Sections 2.1 and 2.1b), possibility of any leakages and regulatory arbitrage is minimal.				
7. Combinations and into	eractions with other measure	s			
	Not applicable.				
7.1 Combinations between G-	Name of institution	O-SII bu	ıffer	G-SII buffer	
SII and O-SII buffers		%		%	
(Article 131.14)		%		%	
		%		%	
	Not applicable.				
	Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O- SII and SyRB rates	
7.2 Combinations with		%		%	
systemic risk buffers		%		%	
(SyRBs)		%		%	
(Article 131.15 CRD)		%		%	
		%		%	
		%		%	
		%		%	
7.3 O-SII requirement for a	Results of the equal expecter Swedbank Baltics AS that is 131.8. Name of O-SII subsidiary		han what is all		
subsidiary (Article 131.8 CRD)		subsidiary		applicable to O- SII EU parent	
	Swedbank Baltics AS	Swedbank AB		1%	
	AS "SEB banka"	Skandinaviska Ensk	IIda Banken AB	1%	
8. Miscellaneous					
8.1 Contact person(s)/mailbox at notifying authority	Kristina Bojare, phone +371	67022128, <u>kristina.</u> l	bojare@bank.lv	<u>/</u>	

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).

8.2 Any other relevant information	Not applicable.
8.3 Date of the notification	Please provide the date on which this notification was uploaded/sent. 08/11/2024