



## 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:

- <u>macropru.notifications@ecb.europa.eu</u> when notifying the ECB (under Article 5 of the Single Supervisory Mechanism (SSM) Regulation<sup>1</sup>);
- <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 measure<sup>2</sup>.

E-mailing/uploading this template to the above addresses constitutes official notification; no further official letter is required. To facilitate the work of the notified authorities, please send the notification template in a format that allows the information to be read electronically.

1. Notifying national aut	hority			
1.1 Name of the notifying authority	Hrvatska narodna banka (HNB)			
1.2 Country of the notifying authority	Croatia			
2. Description of the me	easure			
	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	
2.1a Institution or group of		549300ZHFZ4CSK7VS460 549300A2F46GR0UOM390		
2.1a Institution or group of institutions concerned	Zagreb Erste&Steiermärkische Bank d.d.		level Sub-consolidated and individual	
	Zagreb Erste&Steiermärkische Bank d.d. Rijeka Raiffeisenbank Austria d.d.,	549300A2F46GR0UOM390	level Sub-consolidated and individual Sub-consolidated and individual	
	Zagreb Erste&Steiermärkische Bank d.d. Rijeka Raiffeisenbank Austria d.d., Zagreb	549300A2F46GR0UOM390 529900I1UZV70CZRAU55	level       Sub-consolidated and individual       level       Sub-consolidated and individual       level       Sub-consolidated and individual	

<sup>&</sup>lt;sup>1</sup> Council Regulation (EU) No 1024/2013 of 15 October 2013 conferring specific tasks on the European Central Bank concerning policies relating to the prudential supervision of credit institutions (OJ L 287, 29.10.2013, p. 63). <sup>2</sup> On request by the notifying authority, it may be agreed with the Head of the ESRB Secretariat that this notification, or a part thereof, should not be published for reasons of confidentiality or financial stability.

No changes occurred.           At what level is the fully phased-in buffer (in %) applied to the institution(\$)?           No changes occurred.           At what level is the fully phased-in buffer (in %) applied to the institution(\$)?           New of situation         New OSB buffer         Previous OSB buffer           Zage Sate bank dat, Zage Sate bank dat, Zage Sate Sate Sate Sate Sate Sate Sate Sat								
2.2 Level of the buffer       At what level is the fully phased-in buffer (in %) applied to the institution(s)?         2.2 Level of the buffer       At what level is the fully phased-in buffer (in %) applied to the institution(s)?         2.2 Level of the buffer       Zageb 2012         2.3 Level of the buffer       Exessionmakisable Bank 2%         2.4 Level of the buffer       Exessionmakisable Bank 2%         2.3 Name of the utimate EU       Previous banks 2 %         2.3 Name of the utimate EU       Name of identified O-Sil       Utimate EU parent institution       LEI of utimate parent institution         2.3 Name of the utimate EU       Free Gring Bank 4d., Zageb       Unificati 5.p.A.       Season 7%         2.3 Name of the utimate EU       Free Gring Bank 4d., Zageb       Unificati 5.p.A.       Season 7%         2.4 Names of subsidiaries       Free Gring Bank 4d., Zageb       Season 7%       Season 7%         2.4 Names of subsidiaries       Not applicable       Free Gring Bank Ad.       Extend bank Ad.       Extend bank Ad.         2.4 Names of subsidiaries       Not applicable       Not applicable       Season 7%       Season 7%         3. Timing for the decision       What is the date of the official decision? For SM counties when notifying the EGB: provide the date on which the decision referred to in Article 5 of the Single Supervisory Mechanism Regulation (GSMR) will be taken.         2.4 Names of								
2.2 Level of the buffer       At what level is the fully phased-in buffer (in %) applied to the institution(s)?         2.2 Level of the buffer       At what level is the fully phased-in buffer (in %) applied to the institution(s)?         2.2 Level of the buffer       Zageb 2012         2.3 Level of the buffer       Exessionmakisable Bank 2%         2.4 Level of the buffer       Exessionmakisable Bank 2%         2.3 Name of the utimate EU       Previous banks 2 %         2.3 Name of the utimate EU       Name of identified O-Sil       Utimate EU parent institution       LEI of utimate parent institution         2.3 Name of the utimate EU       Free Gring Bank 4d., Zageb       Unificati 5.p.A.       Season 7%         2.3 Name of the utimate EU       Free Gring Bank 4d., Zageb       Unificati 5.p.A.       Season 7%         2.4 Names of subsidiaries       Free Gring Bank 4d., Zageb       Season 7%       Season 7%         2.4 Names of subsidiaries       Not applicable       Free Gring Bank Ad.       Extend bank Ad.       Extend bank Ad.         2.4 Names of subsidiaries       Not applicable       Not applicable       Season 7%       Season 7%         3. Timing for the decision       What is the date of the official decision? For SM counties when notifying the EGB: provide the date on which the decision referred to in Article 5 of the Single Supervisory Mechanism Regulation (GSMR) will be taken.         2.4 Names of								
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2.2 Level of the buffer       Zagreb       2%       2%         2.3 Name of the ultimate EU       Additio Bank d.d.       15%       1.5%         2.3 Name of the ultimate EU       Name of Identified O-Sil       Ultimate EU parent institution       LEI of ultimate parent institution         2.3 Name of the ultimate EU       Name of Identified O-Sil       Ultimate EU parent institution       LEI of ultimate parent institution         2.3 Name of the ultimate EU       Privatia potamika d.d., Zagreb       UniCreati S.p.A.       543000TRU/VO2CD2G6982         Privatia potamika banka d.d., Zagreb       UniCreati S.p.A.       543000TRU/VO2CD2G6982         Privatia potamika banka d.d., Zagreb       UniCreati S.p.A.       543000TRU/VO2CD2G6982         Privatia potamika banka d.d., Zagreb       UniCreati S.p.A.       543000TRU/VO2CD2G6982         Privatia banka d.d., Zagreb       Privatia d.d., Zagreb       S2487MMF4375Q.JBOU269         OTP banka Hrvatiska d.d., Zagreb       OTP bank Mort       52900UX2MMO20A18X985         Addiko Bank d.d.       Interes Group Bank AG       52900UX2MMO20A18X985 <t< th=""><th></th><th></th><th>2.5%</th><th>2.5%</th></t<>			2.5%	2.5%				
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Rijeka       Raiffeisenbank Austria d.d.,       Raiffeisen Bank International AG       92HRYM6F437SQJ60UG95         OTP banka Hrvatska d.d., Zagreb       OTP Bank Nyrt.       529900W3M00000A18X956         Addiko Bank d.d.       Addiko Bank AG       529900W3M00000A18X956         Addiko Bank d.d.       Addiko Bank AG       529900W3M00000A18X956         Addiko Bank d.d.       Addiko Bank AG       529900W3M00000A18X956         Not applicable       Not applicable       1         Not applicable       Image of parent O-SII subsidiary       LEI of O-SII subsidiary         Identified       Image of D-SII subsidiary       LEI of O-SII subsidiary         Image of parent O-SII identified       Image of D-SII subsidiary       LEI of O-SII subsidiary         Image of parent O-SII identified       Image of D-SII subsidiary       LEI of O-SII subsidiary         Image of parent O-SII identified       Image of D-SII subsidiary       LEI of O-SII subsidiary         Image of parent O-SII identified       Image of D-SII subsidiary       LEI of O-SII subsidiary         Image of parent O-SII identified       Image of D-SII subsidiary       Image of D-SII subsidiary         Image of parent O-SII identified       Image of D-SII subsidiary       Image of D-SII subsidiary         Image of parent O-SII identified       Image of D-SII subsidiary       Image of D-SII subsidiary </th <th>2.3 Name of the ultimate EU</th> <th></th> <th>Intesa Sanpaolo S.p.A.</th> <th>2W8N8UU78PMDQKZENC08</th>	2.3 Name of the ultimate EU		Intesa Sanpaolo S.p.A.	2W8N8UU78PMDQKZENC08				
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3. Timing for the measure         What is the date of the official decision? For SSM countries when notifying the ECB: provide the date on which the decision referred to in Article 5 of the Single Supervisory Mechanism Regulation (SSMR) will be taken.         29/11/2024         What is the date of publication			Name of O-SII subsidiary	LEI of O-SII subsidiary				
3. Timing for the measure         What is the date of the official decision? For SSM countries when notifying the ECB: provide the date on which the decision referred to in Article 5 of the Single Supervisory Mechanism Regulation (SSMR) will be taken.         29/11/2024         What is the date of publication	2.4 Names of subsidiaries							
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3.2 Timing for publication	3.1 Timing for the decision	<u>ECB:</u> provide the date on which the decision referred to in Article 5 of the Single Supervisory Mechanism Regulation (SSMR) will be taken.						
	3.2 Timing for publication	What is the date of publication of the notified measure? 29/11/2024						

3.3 Disclosure	Official decision to identified O-SI institutions via registered post and publication on <u>HNB's web page</u> .					
3.4 Timing for application	What is the intended date of application of the measure? 01/01/2025					
	Not applicable					
3.5 Phasing in	Name of institution	D	ate1 Date	2 Date	3 Date4	Date5
-			% %	%	%	%
			% %	%	%	%
3.6 Review of the measure	At least annually. HNB on reported data as of e					in, based
4. Reason for O-SII ident	tification and activation	of the O-S	II buffer			
	<ul> <li>b. importance for the economy of the relevant Member State or the Union capturing substitutability/financial institution infrastructure;</li> <li>c. complexity, including the additional complexities from cross-border activity;</li> <li>d. interconnectedness of the institution or (sub-)group with the financial system.</li> </ul>					
4.1 Scores of institutions or group of institutions		0070	ability	plexity	nectedness	Score
concerned, as per EBA	Zagrebačka banka d.d., Zagreb	2078	2749	4037	2523	3004
guidelines on the	Privredna banka Zagreb d.d., Zagreb	2389	2155	3231	1872	2412
assessment of O-SIIs (Article 131.3 CRD)	Erste&Steiermärkische Bank d.d. Rijeka	1624	1506	1093	2266	1622
	Raiffeisenbank Austria d.d., Zagreb	747	1178	596	1759	1070
	OTP banka Hrvatska d.d., Zagreb	940	833	653	723	787
	Hrvatska poštanska banka d.d., Zagreb	776	702	51	301	458
	Addiko Bank d.d.	243	253	155	107	190
	Please provide other re calculations and formul in a separate Excel file. a. The identificat	as, data so - <b>see atta</b>	ources, inform ached excel f	ation set u f <b>ile</b>	ised for denor	ninators)
4.2 Methodology and indicators used for designation of the O-SII	Guidelines (Ef b. <b>Threshold: 27</b> institutions wit higher from so	BA/GL/201 75 basis p h scores lo ores of oth	4/10); <b>oints</b> . Lower ower than 350 oer institutions	threshold i basis poir . Accordin	s used to acc nts, but still dis g to their size	ount for stinctively
(Article 131.3)	complexity and		impact on the stemic impor		they belong t	o the

	c. All credit institutio						
	exceeding 0.02% of relative total assets and branches for the purpose of						
	calculating system-wide aggregates – denominators); d.						
	Name of the institution	Size	Substitutability Complexity Interconnectedness Ov				
	Zagrebačka banka d.d. Privredna banka Zagreb d.d.	2708 2389	2749 2155	4037 3231	2523 1872	3004 2412	
	Erste&Steiermärkische Bank d.d. Raiffeisenbank Austria d.d.	1624 747	1506 1178	1093 596	2266 1759	1622 1070	
	OTP banka d.d.	940	833	653	723	787	
	Hrvatska poštanska banka d.d. Addiko Bank d.d.	776 243	702 253	51 155	301 107	458 190	
	Podravska banka d.d. KentBank d.d.	75 80	82 75	20 48	91 59	67 66	
	Istarska kreditna banka Umag d.d.	82	107	9	14	53	
	Agram banka d.d. Karlovačka banka d.d.	66 52	63 60	7 4	73 22	52 35	
	Partner banka d.d. Banka Kovanica d.d.	33 26	42 29	3 17	21 14	25 21	
	Wüstenrot stambena štedionica d.d.	33	34	1	11	20	
	Slatinska banka d.d. Croatia banka d.d.	26 26	32 25	2 5	5	16 16	
	Imex banka d.d.	19	18	4	5	12	
	Samoborska banka d.d. J&T banka d.d.	11 8	16 10	0	2 3	7 7	
	e. Non-bank instituti The scoring process was c identification of one additic	ompleme	ented by exp	pert judgm	nent, resulting i		
	<ul> <li>identification of one additional O-SII, Addiko Bank d.d. This decision was based on the following factors:</li> <li>(1) Additional indicators related to the geographical distribution of the bank's core activities highlight its significant systemic importance in Eastern Croatia, where its market share in claims and deposits is substantial and well above the established threshold,</li> </ul>						
4.3 Supervisory judgement	(2) Continuity considerations, as the bank has been designated as an O-SII since the framework's implementation. Its characteristics align more closely with those of OSI banks than with non-OSI banks. Although it falls below the threshold, its systemic footprint remains distinctly larger than that of the next non-O-SI bank (refer to Table 4.2).						
	(3) The ambiguities surrounding the ownership structure of the parent institution introduce uncertainties regarding the bank's future strategic direction and its systemic importance.						
	Along with the scores of systemic importance obtained in the scoring process, HNB uses the equal expected impact approach as recommended by the ESRE Handbook on Operationalising Macro-prudential Policy in the Banking Sector.					e ESRB	
4.4 Calibrating the O-SII buffer	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.						
	Compared to the last year,	no assig	ned buffer r	ates were	changed.		
4.5 Effectiveness and proportionality of measure	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.						
5. Sufficiency, consisten	cy and non-overlap of the	policy re	sponse				

	Identified O-SI institutions and the level of applied O-SII 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
5.1 Sufficiency of the policy	systemic importance of each O-SII.
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).
5.2 Consistency of	
application of the policy	
response	
	No other policy instruments are used to address the same systemic risk.
5.3 Non-overlap of the policy	
response	
6. Cross-border and cros	ss-sector impact of the measure
	•
	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
6.1 Assessment of cross-	macroprudential policy measures in own jurisdiction, in other Member States and
border effects and the likely	on the Single Market, following the Recommendation/2015/2. Results of this
impact on the Internal Market	assessment show that cross-border effects of the measure are expected to be
(Recommendation	non-significant.
ESRB/2015/2 <sup>3</sup> )	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
6.0 Appapament of lockers	contagion to other Member States.
6.2 Assessment of leakages and regulatory arbitrage	
within the notifying Member	Leakages and regulatory arbitrage within Croatia are not expected as the
State	measure is applied at the highest applicable level of consolidation.
7. Combinations and inte	eractions with other measures

<sup>&</sup>lt;sup>3</sup> 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).

	There are no G-SIIs in Croatia.					
7.1 Combinations between G- SII and O-SII buffers	Name of institution	O-SII buffer		G-SII buffer		
		%	% %			
(Article 131.14)						
	Are any of the institutions idea		hight to a syste	%		
	Are any of the institutions iden If yes, please provide the follo		bject to a syste	mic risk burier?		
		-				
	a. What is/are the syste					
	<ul> <li>b. At what level is/are t consolidation level a</li> </ul>	nd/or individual)?				
	c. Is the sum of the sys			-		
	the higher of the G-S SII buffer and to an institution is subject	O-SII buffer at cons	÷ .	-		
	All credit institutions (both C systemic risk buffer. A SyRB r foreign). The O-SII buffer and	ate of 1.5% is appli	ed to all exposu	ires (domestic and		
	and consolidated level, where their sum is below 5% for all (	e applicable. The tw				
7.2 Combinations with	For more information, see https://www.sec.com/			/financial-		
systemic risk buffers (SyRBs)	The table shows the sums of rates.	f the SyRB rate of	1.5% and calib	orated O-SII buffer		
(Article 131.15 CRD)	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%		
		%		%		
	The cap for the subsidiary does not prevent the implementation of the designated O-SII buffer rates based on the domestic buffer setting methodology.					
7.3 O-SII requirement for a subsidiary (Article 131.8	Name of O-SII subsidiary	Name of the EU parent of the O-SII subsidiary		Buffer applicable to O- SII EU parent		
CRD)	Zagrebačka banka d.d., Zagreb	UniCredit S.p.A.		1.5%		
,	Privredna banka Zagreb d.d., Zagreb	Intesa Sanpaolo S.p.A.		1.25%		
	Erste&Steiermärkische Bank d.d. Rijeka	Erste Group Bank AG		1.75%		
	Raiffeisenbank Austria d.d., Zagreb	Raiffeisen Bank Inte	ernational AG	1.75%		

	OTP banka Hrvatska d.d., Zagreb	OTP Bank Nyrt.	2%		
8. Miscellaneous					
	Ms. Lana Ivicic				
8.1 Contact	Financial Stability Departmen	t			
person(s)/mailbox at	Hrvatska narodna banka				
notifying authority	Phone: +385 1 456 50 09				
	E-mail: lana.ivicic@hnb.hr				
	Not for publication before 29	November 2024			
8.2 Any other relevant information					
	Please provide the date on w	nich this notification was uploaded	l/sent.		
8.3 Date of the notification	15/11/2024				