



## 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](mailto:macropru.notifications@ecb.europa.eu) when notifying the ECB (under Article 5 of the Single Supervisory Mechanism (SSM) Regulation<sup>1</sup>);
- [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 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 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

<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.

<b>2.1b Changes to the list of institutions concerned</b>	No changes occurred.		
<b>2.2 Level of the buffer applied</b>	At what level is the fully phased-in buffer (in %) applied to the institution(s)?		
	<b>Name of institution</b>	<b>New O-SII buffer</b>	<b>Previous O-SII buffer</b>
	Zagrebačka banka d.d., Zagreb	2.5%	2.5%
	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%	1.0%
	Addiko Bank d.d.	0.25%	0.25%
<b>2.3 Name of the ultimate EU parent institution</b>	<b>Name of identified O-SII</b>	<b>Ultimate EU parent institution</b>	<b>LEI of ultimate parent institution</b>
	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
<b>2.4 Names of subsidiaries</b>	Not applicable		
	<b>Name of parent O-SII identified</b>	<b>Name of O-SII subsidiary</b>	<b>LEI of O-SII subsidiary</b>
<b>3. Timing for the measure</b>			
<b>3.1 Timing for the decision</b>	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. 29/11/2024		
<b>3.2 Timing for publication</b>	What is the date of publication of the notified measure? 29/11/2024		

<b>3.3 Disclosure</b>	Official decision to identified O-SI institutions via registered post and publication on <a href="#">HNB's web page</a> .																																																						
<b>3.4 Timing for application</b>	What is the intended date of application of the measure? 01/01/2025																																																						
<b>3.5 Phasing in</b>	Not applicable <table border="1" data-bbox="571 443 1441 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		%	%	%	%	%		%	%	%	%	%																																				
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<b>3.6 Review of the measure</b>	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.																																																						
<b>4. Reason for O-SII identification and activation of the O-SII buffer</b>																																																							
<b>4.1 Scores of institutions or group of institutions concerned, as per EBA guidelines on the assessment of O-SIIs (Article 131.3 CRD)</b>	<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"> <li>size;</li> <li>importance for the economy of the relevant Member State or the Union, capturing substitutability/financial institution infrastructure;</li> <li>complexity, including the additional complexities from cross-border activity;</li> <li>interconnectedness of the institution or (sub-)group with the financial system.</li> </ol> <table border="1" data-bbox="571 1088 1441 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>2078</td> <td>2749</td> <td>4037</td> <td>2523</td> <td>3004</td> </tr> <tr> <td>Privredna banka Zagreb d.d., Zagreb</td> <td>2389</td> <td>2155</td> <td>3231</td> <td>1872</td> <td>2412</td> </tr> <tr> <td>Erste&amp;Steiermärkische Bank d.d. Rijeka</td> <td>1624</td> <td>1506</td> <td>1093</td> <td>2266</td> <td>1622</td> </tr> <tr> <td>Raiffeisenbank Austria d.d., Zagreb</td> <td>747</td> <td>1178</td> <td>596</td> <td>1759</td> <td>1070</td> </tr> <tr> <td>OTP banka Hrvatska d.d., Zagreb</td> <td>940</td> <td>833</td> <td>653</td> <td>723</td> <td>787</td> </tr> <tr> <td>Hrvatska poštanska banka d.d., Zagreb</td> <td>776</td> <td>702</td> <td>51</td> <td>301</td> <td>458</td> </tr> <tr> <td>Addiko Bank d.d.</td> <td>243</td> <td>253</td> <td>155</td> <td>107</td> <td>190</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. - <b>see attached excel file</b></p>	Name of institution	Size	Substitutability	Complexity	Interconnectedness	Overall Score	Zagrebačka banka d.d., Zagreb	2078	2749	4037	2523	3004	Privredna banka Zagreb d.d., Zagreb	2389	2155	3231	1872	2412	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						
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<b>4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)</b>	<ol style="list-style-type: none"> <li>The identification process followed the methodology set out in the EBA Guidelines (EBA/GL/2014/10);</li> <li><b>Threshold: 275 basis points.</b> 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;</li> </ol>																																																						

	<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="571 322 1442 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>2708</td><td>2749</td><td>4037</td><td>2523</td><td>3004</td></tr> <tr><td>Privredna banka Zagreb d.d.</td><td>2389</td><td>2155</td><td>3231</td><td>1872</td><td>2412</td></tr> <tr><td>Erste&amp;Steiermärkische Bank d.d.</td><td>1624</td><td>1506</td><td>1093</td><td>2266</td><td>1622</td></tr> <tr><td>Raiffeisenbank Austria d.d.</td><td>747</td><td>1178</td><td>596</td><td>1759</td><td>1070</td></tr> <tr><td>OTP banka d.d.</td><td>940</td><td>833</td><td>653</td><td>723</td><td>787</td></tr> <tr><td>Hrvatska poštanska banka d.d.</td><td>776</td><td>702</td><td>51</td><td>301</td><td>458</td></tr> <tr><td>Addiko Bank d.d.</td><td>243</td><td>253</td><td>155</td><td>107</td><td>190</td></tr> <tr><td>Podravska banka d.d.</td><td>75</td><td>82</td><td>20</td><td>91</td><td>67</td></tr> <tr><td>KentBank d.d.</td><td>80</td><td>75</td><td>48</td><td>59</td><td>66</td></tr> <tr><td>Istarska kreditna banka Umag d.d.</td><td>82</td><td>107</td><td>9</td><td>14</td><td>53</td></tr> <tr><td>Agram banka d.d.</td><td>66</td><td>63</td><td>7</td><td>73</td><td>52</td></tr> <tr><td>Karlovačka banka d.d.</td><td>52</td><td>60</td><td>4</td><td>22</td><td>35</td></tr> <tr><td>Partner banka d.d.</td><td>33</td><td>42</td><td>3</td><td>21</td><td>25</td></tr> <tr><td>Banka Kovanica d.d.</td><td>26</td><td>29</td><td>17</td><td>14</td><td>21</td></tr> <tr><td>Wüstenrot stambena štedionica d.d.</td><td>33</td><td>34</td><td>1</td><td>11</td><td>20</td></tr> <tr><td>Slatinska banka d.d.</td><td>26</td><td>32</td><td>2</td><td>5</td><td>16</td></tr> <tr><td>Croatia banka d.d.</td><td>26</td><td>25</td><td>5</td><td>6</td><td>16</td></tr> <tr><td>Imex banka d.d.</td><td>19</td><td>18</td><td>4</td><td>5</td><td>12</td></tr> <tr><td>Samoborska banka d.d.</td><td>11</td><td>16</td><td>0</td><td>2</td><td>7</td></tr> <tr><td>J&amp;T banka d.d.</td><td>8</td><td>10</td><td>7</td><td>3</td><td>7</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.	2708	2749	4037	2523	3004	Privredna banka Zagreb d.d.	2389	2155	3231	1872	2412	Erste&Steiermärkische Bank d.d.	1624	1506	1093	2266	1622	Raiffeisenbank Austria d.d.	747	1178	596	1759	1070	OTP banka d.d.	940	833	653	723	787	Hrvatska poštanska banka d.d.	776	702	51	301	458	Addiko Bank d.d.	243	253	155	107	190	Podravska banka d.d.	75	82	20	91	67	KentBank d.d.	80	75	48	59	66	Istarska kreditna banka Umag d.d.	82	107	9	14	53	Agram banka d.d.	66	63	7	73	52	Karlovačka banka d.d.	52	60	4	22	35	Partner banka d.d.	33	42	3	21	25	Banka Kovanica d.d.	26	29	17	14	21	Wüstenrot stambena štedionica d.d.	33	34	1	11	20	Slatinska banka d.d.	26	32	2	5	16	Croatia banka d.d.	26	25	5	6	16	Imex banka d.d.	19	18	4	5	12	Samoborska banka d.d.	11	16	0	2	7	J&T banka d.d.	8	10	7	3	7
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<p><b>4.3 Supervisory judgement</b></p>	<p>The scoring process was complemented by expert judgment, resulting in the identification of one additional O-SII, Addiko Bank d.d. This decision was based on the following factors:</p> <p>(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,</p> <p>(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).</p> <p>(3) The ambiguities surrounding the ownership structure of the parent institution introduce uncertainties regarding the bank's future strategic direction and its systemic importance.</p>																																																																																																																														
<p><b>4.4 Calibrating the O-SII buffer</b></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, no assigned buffer rates were changed.</p>																																																																																																																														
<p><b>4.5 Effectiveness and proportionality of measure</b></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>																																																																																																																														
<p><b>5. Sufficiency, consistency and non-overlap of the policy response</b></p>																																																																																																																															

<b>5.1 Sufficiency of the policy response</b>	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 systemic importance of each O-SII.
<b>5.2 Consistency of application of the policy response</b>	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).
<b>5.3 Non-overlap of the policy response</b>	No other policy instruments are used to address the same systemic risk.
<b>6. Cross-border and cross-sector impact of the measure</b>	
<b>6.1 Assessment of cross-border effects and the likely impact on the Internal Market (Recommendation ESRB/2015/2<sup>3</sup>)</b>	<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 (<a href="#">OG. 60/2017</a>) 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>
<b>6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State</b>	Leakages and regulatory arbitrage within Croatia are not expected as the measure is applied at the highest applicable level of consolidation.
<b>7. Combinations and interactions with other measures</b>	

<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).

<p><b>7.1 Combinations between G-SII and O-SII buffers</b> <b>(Article 131.14)</b></p>	<p>There are no G-SIIs in Croatia.</p> <table border="1" data-bbox="571 232 1441 380"> <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		%	%		%	%		%	%																								
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<p><b>7.2 Combinations with systemic risk buffers (SyRBs)</b> <b>(Article 131.15 CRD)</b></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"> <li>What is/are the systemic risk buffer rates(s)?</li> <li>At what level is/are the systemic risk buffer rate(s) applied (i.e. consolidation level and/or individual)?</li> <li>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%?</li> </ol> <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). 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 <a href="https://www.hnb.hr/en/core-functions/financial-stability/cnb-s-macroprudential-policy/systemic-risk-buffer">https://www.hnb.hr/en/core-functions/financial-stability/cnb-s-macroprudential-policy/systemic-risk-buffer</a>.</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&amp;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%		%		%
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<p><b>7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)</b></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 1778 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>1.5%</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&amp;Steiermärkische Bank d.d. Rijeka</td> <td>Erste Group Bank AG</td> <td>1.75%</td> </tr> <tr> <td>Raiffeisenbank Austria d.d., Zagreb</td> <td>Raiffeisen Bank International AG</td> <td>1.75%</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	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 International AG	1.75%																					
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	OTP banka Hrvatska d.d., Zagreb	OTP Bank Nyrt.	2%
<b>8. Miscellaneous</b>			
<b>8.1 Contact person(s)/mailbox at notifying authority</b>	Ms. Lana Ivicic Financial Stability Department Hrvatska narodna banka Phone: +385 1 456 50 09 E-mail: lana.ivicic@hnb.hr		
<b>8.2 Any other relevant information</b>	Not for publication before 29 November 2024		
<b>8.3 Date of the notification</b>	Please provide the date on which this notification was uploaded/sent. 15/11/2024		