

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	Národná banka Slovenska													
1.2 Country of the notifying authority	Slovakia													
2. Description of the measure														
2.1a Institution or group of institutions concerned	On which institution(s) is the measure applied (name and Legal Entity Identifier (LEI) code)?													
	Is the measure applied at:													
	<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>Slovenská sporiteľňa, a. s.</td> <td>549300S2T3FWVVXWJ89</td> <td>individual and sub-consolidated</td> </tr> <tr> <td>Všeobecná úverová banka, a. s.</td> <td>549300JB1P61FUTPEZ75</td> <td>individual and sub-consolidated</td> </tr> <tr> <td>Tatra banka, a. s.</td> <td>3157002JBFAI478MD587</td> <td>individual and sub-consolidated</td> </tr> </tbody> </table>		Name of institution	LEI	Consolidation level	Slovenská sporiteľňa, a. s.	549300S2T3FWVVXWJ89	individual and sub-consolidated	Všeobecná úverová banka, a. s.	549300JB1P61FUTPEZ75	individual and sub-consolidated	Tatra banka, a. s.	3157002JBFAI478MD587	individual and sub-consolidated
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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 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.

	Československá obchodná banka, a. s.	52990096Q5LMCH1WU462	individual and sub-consolidated																					
	Prima banka Slovensko, a. s.	315700K45LRKNGMUIW27	individual and sub-consolidated																					
2.1b Changes to the list of institutions concerned	No change has been made to the list of O-SIIs.																							
2.2 Level of the buffer applied	<p>At what level is the fully phased-in buffer (in %) applied to the institution(s)?</p> <p>The O-SII buffer is applied on both individual and sub-consolidated level.</p> <table border="1"> <thead> <tr> <th>Name of institution</th><th>New O-SII buffer</th><th>Previous O-SII buffer</th></tr> </thead> <tbody> <tr> <td>Slovenská sporiteľňa, a.s.</td><td>2.00%</td><td>2.00%</td></tr> <tr> <td>Všeobecná úverová banka, a.s.</td><td>1.75%</td><td>1.75%</td></tr> <tr> <td>Tatra banka, a.s.</td><td>1.50%</td><td>1.50%</td></tr> <tr> <td>Československá obchodná banka, a.s.</td><td>1.00%</td><td>1.00%</td></tr> <tr> <td>Prima banka Slovensko, a.s.</td><td>0.25%</td><td>0.25%</td></tr> <tr> <td></td><td></td><td></td></tr> </tbody> </table>			Name of institution	New O-SII buffer	Previous O-SII buffer	Slovenská sporiteľňa, a.s.	2.00%	2.00%	Všeobecná úverová banka, a.s.	1.75%	1.75%	Tatra banka, a.s.	1.50%	1.50%	Československá obchodná banka, a.s.	1.00%	1.00%	Prima banka Slovensko, a.s.	0.25%	0.25%			
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2.3 Name of the ultimate EU parent institution	<p>Please provide the name and LEI code of the ultimate EU parent institution of the group for each of the O-SIIs identified. If the ultimate EU parent institution is not the concerned institution itself.</p> <table border="1"> <thead> <tr> <th>Name of identified O-SII</th><th>Ultimate EU parent institution</th><th>LEI of ultimate parent institution</th></tr> </thead> <tbody> <tr> <td>Slovenská sporiteľňa, a.s.</td><td>Erste Group Bank AG</td><td>PQOH26KWDF7CG10L6792</td></tr> <tr> <td>Všeobecná úverová banka, a.s.</td><td>Gruppo Intesa Sanpaolo</td><td>815600A0090DB5D4D574</td></tr> <tr> <td>Tatra banka, a.s.</td><td>Raiffeisen Bank International AG</td><td>529900JP9C734S1LE008</td></tr> <tr> <td>Československá obchodná banka, a.s.</td><td>KBC Group NV</td><td>213800X3Q9LSAKRUWY91</td></tr> <tr> <td>Prima banka Slovensko, a.s.</td><td>Penta Investments Limited</td><td>315700B14D4M8960OB55</td></tr> <tr> <td></td><td></td><td></td></tr> </tbody> </table>			Name of identified O-SII	Ultimate EU parent institution	LEI of ultimate parent institution	Slovenská sporiteľňa, a.s.	Erste Group Bank AG	PQOH26KWDF7CG10L6792	Všeobecná úverová banka, a.s.	Gruppo Intesa Sanpaolo	815600A0090DB5D4D574	Tatra banka, a.s.	Raiffeisen Bank International AG	529900JP9C734S1LE008	Československá obchodná banka, a.s.	KBC Group NV	213800X3Q9LSAKRUWY91	Prima banka Slovensko, a.s.	Penta Investments Limited	315700B14D4M8960OB55			
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2.4 Names of subsidiaries	<p>If any of the O-SIIs identified is a parent institution and the buffer is applied at a (sub)consolidated level, please name the subsidiaries of the institution that are notified as O-SIIs (please give names and LEI codes).</p> <table border="1"> <thead> <tr> <th>Name of parent O-SII identified</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> </tbody> </table>			Name of parent O-SII identified	Name of O-SII subsidiary	LEI of O-SII subsidiary																		
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3.1 Timing for the decision	<p>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.</p> <p>27/05/2025</p>																							

3.2 Timing for publication	<p>What is the date of publication of the notified measure?</p> <p>06/06/2025</p>																																																						
3.3 Disclosure	<p>Information about the strategy for if the communicating the notified measure to the market.</p> <p>Please provide a link to the public announcement, if any.</p> <p>The measure will be published on the website of Národná banka Slovenska (https://nbs.sk/en/financial-stability/fs-instruments/o-sii/) and will be also delivered via mail to all the identified O-SIIs.</p>																																																						
3.4 Timing for application	<p>What is the intended date of application of the measure?</p> <p>01/01/2026</p>																																																						
3.5 Phasing in	<p>What is the intended timeline for the phase-in of the measure?</p> <p>No phase-in period is required as buffer requirements remain unchanged.</p> <table border="1"> <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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3.6 Review of the measure	<p>When will the measure be reviewed (Article 131, paragraphs (6) and (12), specify that the buffer, the identification of O-SIIs and their allocation to subcategories must be reviewed at least annually)?</p> <p>The next review should be taken in April/May 2026.</p>																																																						
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> <ul style="list-style-type: none"> a. size; b. importance for the economy of the relevant Member State or the Union, capturing substitutability/financial institution infrastructure; c. complexity, including the additional complexities from cross-border activity; d. interconnectedness of the institution or (sub-)group with the financial system. <table border="1"> <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>Slovenská sporiteľňa, a.s.</td><td>2128</td><td>1713</td><td>810</td><td>1502</td><td>1538</td></tr> <tr> <td>Všeobecná úverová banka, a.s.</td><td>2029</td><td>1947</td><td>3185</td><td>1973</td><td>2284</td></tr> <tr> <td>Tatra banka, a.s.</td><td>1663</td><td>1810</td><td>1237</td><td>1441</td><td>1538</td></tr> <tr> <td>Československá obchodná banka, a.s.</td><td>1130</td><td>862</td><td>1323</td><td>1102</td><td>1104</td></tr> <tr> <td>Prima banka Slovensko, a.s.</td><td>534</td><td>425</td><td>95</td><td>409</td><td>366</td></tr> <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> <tr> <td></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table>	Name of institution	Size	Substitutability	Complexity	Interconnectedness	Overall Score	Slovenská sporiteľňa, a.s.	2128	1713	810	1502	1538	Všeobecná úverová banka, a.s.	2029	1947	3185	1973	2284	Tatra banka, a.s.	1663	1810	1237	1441	1538	Československá obchodná banka, a.s.	1130	862	1323	1102	1104	Prima banka Slovensko, a.s.	534	425	95	409	366																		
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	<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>
<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; <p>The EBA guidelines were fully followed when identifying O-SIIs.</p> b. which threshold score has been set to identify O-SIIs; <p>In the first step the threshold was set to 350 basis points. Similarly in the second step the threshold is 350 basis points. (EBA/GL/2014/10)</p> c. whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process; <p>All banks as well as branches have been included in the calculations.</p> d. the names and scores of all relevant entities not excluded from the identification process (could be sent in a separate Excel file, see 4.1); <p>Separate excel file is attached.</p> e. whether non-bank institutions have been included in the calculations. <p>Non-bank institutions have not been included in the calculation.</p>
<p>4.3 Supervisory judgement</p>	<p>Have any of the institutions listed in 2.1 been identified by applying 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 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. <p>All 5 O-SIIs have been identified in the first step. The second step consists of 9 optional indicators: total assets, retail loans, retail deposits, corporate loans, corporate deposits, government bonds, interbank liabilities, interbank assets and covered bonds. These optional indicators characterize a traditional Slovak banking sector better and are suitable for O-SII identification. Both first step and second step have identified the same list of banks as O-SIIs.</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>Identified O-SIIs are required to maintain a level of O-SII buffer (see section 6). The O-SII buffers have been calibrated according to the score of the identified institutions in the second step. See indicators listed in Section 4.3.</p>

	<p>In comparison with previous decision the list of O-SIIs identified is unchanged.</p> <p>O-SII buffer rates of banks have not been changed and will be the same also from 1 January 2026.</p>
4.5 Effectiveness and proportionality of measure	<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>As the decision is only to review the O-SII identification and no change has been made, this point is not relevant.</p>
5. Sufficiency, consistency and non-overlap of the policy response	
5.1 Sufficiency of the policy response	<p>For a macroprudential policy to be 'sufficient', the policy responses must be deemed 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 in assessing the sufficiency of the macroprudential policy in the Member State.</p> <p>Please provide any additional information that the ESRB should consider in assessing the sufficiency of the policy response.</p> <p>In the second step NBS uses its own methodology which consists of 9 optional indicators. These indicators are used to count a total score, with the weights being distributed proportionally between the segments of banking sector. These indicators sufficiently characterize the picture of risks in the Slovak banking sector.</p>
5.2 Consistency of application of the policy response	<p>For a macroprudential policy to be 'consistent', the policy instruments meet their respective objectives, as outlined in ESRB/2013/1³, and must be implemented in accordance with the common principles set out in the relevant legal texts.</p> <p>Note that the ESRB assessment of consistency will consider whether the same systemic risks are addressed in a similar way across and within the Member States over time.</p> <p>Please provide any additional information that the ESRB should consider in assessing the consistency of the policy response.</p> <p>Our review on O-SIIs is fully in line with the methodology laid down in the EBA Guidelines. NBS own methodology is also based on the EBA methodology while also taking into account certain specific features of the Slovak banking sector.</p>
5.3 Non-overlap of the policy response	<p>For a policy instrument to be 'non-overlapping', it should aim to address a systemic risk that either differs from a risk addressed by other active tools in the same Member State, or 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 need for more than one instrument to address the same systemic risk and how the different instruments interact with each other. <p>As the decision is only to review the O-SII identification and no change has been made, this point is not relevant.</p>

³ Recommendation of the European Systemic Risk Board of 4 April 2013 on intermediate objectives and instruments of macro-prudential policy (ESRB/2013/1) (OJ C 170, 15.6.2013, p. 1)

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/2015/2⁴)	<p>Assessment of the cross-border effects of 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 Macroprudential Policy in the Banking Sector⁵ 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>b. Assessment of the:</p> <ul style="list-style-type: none"> ○ cross-border effects of implementation of the measure in your own jurisdiction (inward spillovers); ○ cross-border effects on other Member States and on the Single Market of the measure (outward spillovers); ○ overall impact on the Single Market of implementation of the measure. <p>As the decision is only to review the O-SII identification and no change has been made, this point is not relevant.</p>												
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>As the decision is only to review the O-SII identification and no change has been made, this point is not relevant.</p>												
7. Combinations and interactions with other measures													
7.1 Combinations between G-SII and O-SII buffers (Article 131.14)	<p>If both G-SII and O-SII criteria apply to the same institution at consolidated level, which of the two buffers is the highest?</p> <p>N/A: there are no G-SIIs identified in Slovakia.</p> <table border="1"> <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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7.2 Combinations with systemic risk buffers (SyRBs) (Article 131.15 CRD)	<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> <p>a. What is/are the systemic risk buffer rates(s)?</p> <p>b. At what level is/are the systemic risk buffer rate(s) applied (i.e. consolidation level and/or individual)?</p> <p>c. 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>												

⁴ 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).

⁵ Available on the ESRB's website at www.esrb.europa.eu.

	<p>N/A</p> <table border="1"> <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></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</td></tr> <tr><td></td><td>%</td><td></td><td>%</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		%		%		%		%		%		%		%		%		%		%		%		%		%		%		%		%		%		%
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<p>7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)</p>	<p>If the O-SII is a subsidiary of an EU parent institution 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>Does the cap for the subsidiary prevent the implementation of a higher O-SII buffer based on the domestic buffer setting methodology?</p> <p>N/A</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></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 O-SII subsidiary	Name of the EU parent of the O-SII subsidiary	Buffer applicable to O-SII EU parent			%			%			%																												
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<p>8. Miscellaneous</p>																																									
<p>8.1 Contact person(s)/mailbox at notifying authority</p>	<p>Contact person(s) (name, phone number and e-mail address) and mailbox for further inquiries.</p> <p>Marek Ličák, phone: +421 2 5787 2863, e-mail: marek.licak@nbs.sk</p> <p>Andrej Moravčík, phone: +421 2 5787 2995, e-mail: andrej.moravcik@nbs.sk</p>																																								
<p>8.2 Any other relevant information</p>																																									
<p>8.3 Date of the notification</p>	<p>Please provide the date on which this notification was uploaded/sent.</p> <p>07/05/2025</p>																																								