

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	Komisja Nadzoru Finansowego (KNF)		
1.2 Country of the notifying authority	Poland		
2. Description of the measure			
2.1a Institution or group of institutions concerned	Based on data available as of 31 December 2024, 10 Polish legal entities were identified as O-SIIs. The names and LEI code of them are as following. The O-SII buffer is applicable at the highest level of consolidation.		
	Name of institution	LEI	Consolidation level
	Powszechna Kasa Oszczędności Bank Polski SA	P4GTT6GF1W40CVIMFR43	consolidated and individual level
	Bank Polska Kasa Opieki SA	5493000LKS7B3UTF7H35	consolidated and individual level
	mBank SA	259400DZXF7UJJK2AY35	consolidated and individual level
	Santander Bank Polska SA	259400LGXW3K0GDAG361	consolidated and individual level
	ING Bank Śląski SA	259400YLRTOBISHBVX41	consolidated and individual level

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.

	<table><tr><td>BNP Paribas Bank Polska SA</td><td>NMH2KF074RKAGTH4CM63</td><td>consolidated and individual level</td></tr><tr><td>Bank Handlowy w Warszawie SA</td><td>XLEZHWWOI4HFQDGL4793</td><td>consolidated and individual level</td></tr><tr><td>Bank Millennium SA</td><td>2594000FDZ9KPZE08K78</td><td>consolidated and individual level</td></tr><tr><td>SGB-Bank SA</td><td>259400P9KF07OP2K5P83</td><td>individual level</td></tr><tr><td>Bank Polskiej Spółdzielczości SA</td><td>BB3BGO3LCED63R8R9R41</td><td>consolidated and individual level</td></tr></table>	BNP Paribas Bank Polska SA	NMH2KF074RKAGTH4CM63	consolidated and individual level	Bank Handlowy w Warszawie SA	XLEZHWWOI4HFQDGL4793	consolidated and individual level	Bank Millennium SA	2594000FDZ9KPZE08K78	consolidated and individual level	SGB-Bank SA	259400P9KF07OP2K5P83	individual level	Bank Polskiej Spółdzielczości SA	BB3BGO3LCED63R8R9R41	consolidated and individual level																					
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2.1b Changes to the list of institutions concerned	Compared to the results of the previous evaluation carried out in 2024 on the basis of data for the financial year ended 31 December 2023, there are no changes in the above presented list.																																				
2.2 Level of the buffer applied	<table><tr><td colspan="3">At what level is the fully phased-in buffer (in %) applied to the institution(s)?</td></tr><tr><td>Name of institution</td><td>New O-SII buffer</td><td>Previous O-SII buffer</td></tr><tr><td>Powszechna Kasa Oszczędności Bank Polski SA</td><td>2.00%</td><td>2.00%</td></tr><tr><td>Santander Bank Polska SA</td><td>1.50%</td><td>1.00%</td></tr><tr><td>Bank Polska Kasa Opieki SA</td><td>1.00%</td><td>1.00%</td></tr><tr><td>ING Bank Śląski SA</td><td>1.00%</td><td>1.00%</td></tr><tr><td>mBank SA</td><td>0.50%</td><td>0.50%</td></tr><tr><td>BNP Paribas Bank Polska SA</td><td>0.25%</td><td>0.50%</td></tr><tr><td>Bank Handlowy w Warszawie SA</td><td>0.25%</td><td>0.25%</td></tr><tr><td>Bank Millennium SA</td><td>0.25%</td><td>0.25%</td></tr><tr><td>SGB-Bank SA</td><td>0.25%</td><td>0.25%</td></tr><tr><td>Bank Polskiej Spółdzielczości SA</td><td>0.25%</td><td>0.25%</td></tr></table>	At what level is the fully phased-in buffer (in %) applied to the institution(s)?			Name of institution	New O-SII buffer	Previous O-SII buffer	Powszechna Kasa Oszczędności Bank Polski SA	2.00%	2.00%	Santander Bank Polska SA	1.50%	1.00%	Bank Polska Kasa Opieki SA	1.00%	1.00%	ING Bank Śląski SA	1.00%	1.00%	mBank SA	0.50%	0.50%	BNP Paribas Bank Polska SA	0.25%	0.50%	Bank Handlowy w Warszawie SA	0.25%	0.25%	Bank Millennium SA	0.25%	0.25%	SGB-Bank SA	0.25%	0.25%	Bank Polskiej Spółdzielczości SA	0.25%	0.25%
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2.3 Name of the ultimate EU parent institution	<table><tr><td colspan="3">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.</td></tr><tr><td>Name of identified O-SII</td><td>Ultimate EU parent institution</td><td>LEI of ultimate parent institution</td></tr><tr><td>mBank SA</td><td>Commerzbank AG</td><td>851WYGNLUQLFZBSYGB56</td></tr><tr><td>Santander Bank Polska SA</td><td>Banco Santander S.A.</td><td>5493006QMFDDMYWIAM13</td></tr><tr><td>ING Bank Śląski SA</td><td>ING Groep N.V.</td><td>549300NYYK9MWM7GGW15</td></tr><tr><td>BNP Paribas Bank Polska SA</td><td>BNP Paribas</td><td>R0MUWSFPU8MPRO8K5P83</td></tr><tr><td>Bank Millennium SA</td><td>Banco Comercial Português, S.,A.</td><td>JU1U6S0DG9YL T7N8ZV32</td></tr><tr><td>Bank Handlowy w Warszawie SA</td><td>Citibank Holdings Ireland Ltd.</td><td>549300K7L8YW8M215U46</td></tr></table>	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.			Name of identified O-SII	Ultimate EU parent institution	LEI of ultimate parent institution	mBank SA	Commerzbank AG	851WYGNLUQLFZBSYGB56	Santander Bank Polska SA	Banco Santander S.A.	5493006QMFDDMYWIAM13	ING Bank Śląski SA	ING Groep N.V.	549300NYYK9MWM7GGW15	BNP Paribas Bank Polska SA	BNP Paribas	R0MUWSFPU8MPRO8K5P83	Bank Millennium SA	Banco Comercial Português, S.,A.	JU1U6S0DG9YL T7N8ZV32	Bank Handlowy w Warszawie SA	Citibank Holdings Ireland Ltd.	549300K7L8YW8M215U46												
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3.2 Timing for publication	What is the date of publication of the notified measure? 25/11/2025																																												
3.3 Disclosure	The information will be disclosed on the KNF website as a briefing note, immediately after the decision is signed and delivered to the entities. Link: https://www.knf.gov.pl/?articleId=96131&p_id=18																																												
3.4 Timing for application	What is the intended date of application of the measure? Immediate. Click here to enter a date.																																												
3.5 Phasing in	Fully-loaded implementation <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	On an annual basis.																																												
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)	Please list here the names, overall scores and category scores of the O-SIIs identified based on <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. In stage 1 (referring to 4.3), the score of the identified O-SIIs is the following: <table border="1"> <thead> <tr> <th>Stage 1</th> <th>Size</th> <th>Substitutability</th> <th>Complexity</th> <th>Interconnectedness</th> <th>Overall Score</th> </tr> </thead> <tbody> <tr> <td>Powszechna Kasa Oszczędności SA</td> <td>1 928</td> <td>1 723</td> <td>1 349</td> <td>1 849</td> <td>1 712</td> </tr> <tr> <td>Santander Bank Polska SA</td> <td>1 113</td> <td>1 078</td> <td>2 050</td> <td>1 385</td> <td>1 407</td> </tr> <tr> <td>Bank Polska Kasa Opieki SA</td> <td>1 223</td> <td>1 257</td> <td>944</td> <td>1 391</td> <td>1 204</td> </tr> <tr> <td>ING Bank Śląski SA</td> <td>953</td> <td>1 084</td> <td>1 901</td> <td>713</td> <td>1 163</td> </tr> <tr> <td>mBank SA</td> <td>903</td> <td>1 076</td> <td>495</td> <td>858</td> <td>833</td> </tr> <tr> <td>BNP Paribas Bank Polska SA</td> <td>613</td> <td>621</td> <td>864</td> <td>672</td> <td>693</td> </tr> </tbody> </table>			Stage 1	Size	Substitutability	Complexity	Interconnectedness	Overall Score	Powszechna Kasa Oszczędności SA	1 928	1 723	1 349	1 849	1 712	Santander Bank Polska SA	1 113	1 078	2 050	1 385	1 407	Bank Polska Kasa Opieki SA	1 223	1 257	944	1 391	1 204	ING Bank Śląski SA	953	1 084	1 901	713	1 163	mBank SA	903	1 076	495	858	833	BNP Paribas Bank Polska SA	613	621	864	672	693
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Bank Handlowy w Warszawie SA	273	515	761	501	513
Bank Millennium SA	509	557	224	373	416
SGB-Bank SA	128	55	2	274	115
Bank Polskiej Spółdzielczości SA	127	123	10	99	89

In the stage 2 (referring to 4.3), the score of the identified O-SIIs is the following:

Stage 2	Size	Substitutability	Complexity	Interconnectedness	Overall Score
Powszechna Kasa Oszczędności SA	1 928	1 723	1 604	1 959	1 804
Santander Bank Polska SA	1 113	1 078	1 806	1 288	1 321
Bank Polska Kasa Opieki SA	1 223	1 257	805	1 324	1 152
ING Bank Śląski SA	953	1 084	1 624	804	1 116
mBank SA	903	1 076	591	880	863
BNP Paribas Bank Polska SA	613	621	790	611	659
Bank Handlowy w Warszawie SA	273	515	766	403	489
Bank Millennium SA	509	557	350	445	465
SGB-Bank SA	128	55	36	206	106
Bank Polskiej Spółdzielczości SA	127	123	80	77	101

In the final stage, the overall score is the following:

Name of institution	Size	Substitutability	Complexity	Interconnectedness	Overall Score
Powszechna Kasa Oszczędności Bank Polski SA	1 928	1 723	1 604	1 959	1 804
Santander Bank Polska SA	1 113	1 078	2 050	1 385	1 407
Bank Polska Kasa Opieki SA	1223	1257	944	1 391	1 204
ING Bank Śląski SA	953	1 084	1 901	713	1 163
mBank SA	903	1 076	591	880	863
BNP Paribas Bank Polska SA	613	621	864	672	693
Bank Handlowy w Warszawie SA	273	515	761	501	513
Bank Millennium SA	509	557	350	445	465
SGB-Bank SA	128	55	2	274	115
Bank Polskiej Spółdzielczości SA	127	123	80	77	101

4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)	The KNF followed the EBA guidelines. All the obligatory criteria, indicators and weights have been applied. Where the data were not available at the highest consolidated level under the KNF jurisdiction, relevant proxies have been used. The threshold has been set at 350. All banks that are institutions under art. 4 (3) of the CRR have been included in the calculations and investment firms have been excluded.				
	The full list of relevant authorities that have been included in the identification process and it is presented in line with the 3-stages approach (as in 4.3):				
	Bank	I stage	II stage	Final score	
	Powszechna Kasa Oszczędności SA	1 712	1 804	1 804	
	Bank Handlowy w Warszawie SA	513	489	513	
	ING Bank Śląski SA	1 163	1 116	1 163	
	Bank BPH SA	13	12	13	
	Santander Bank Polska SA	1 407	1321	1 407	
	mBank SA	833	863	863	
	Bank Millennium SA	416	465	465	
	Bank Polska Kasa Opieki SA	1 204	1 152	1 204	
	Bank Pocztowy SA	22	28	28	
	Bank Ochrony Środowiska SA	49	65	65	
	SGB-Bank SA	115	106	115	
	Plus Bank SA	2	3	3	
	Nest Bank SA	17	23	23	
	Deutsche Bank Polska SA	127	135	135	
	Bank Polskiej Spółdzielczości SA	89	101	101	
	Credit Agricole Bank Polska SA	92	108	108	
	BNP Paribas Bank Polska SA	693	659	693	
	Toyota Bank Polska SA	31	34	34	
	DNB Bank Polska SA	6	7	7	
	Alior Bank SA	258	296	296	
	Bank Nowy SA	7	8	8	
	Velo Bank SA	116	136	136	
	4.3 Supervisory judgement	The identification method consists of 3 stages:			
		<div>1. Calculation of scores basing on basic criteria and indicators as in EBA guidelines. Identification of the entities basing on the score.</div> <div>2. Calculation of scores basing on enhanced criteria and indicators as in EBA guidelines. Identification of the entities basing on the score (Score calculated for all, but only non-OSII from the stage 1 are added to the O-SII group).</div> <div><div>a. The criterion “Complexity/cross-border activity” was enlarged with optional indicator “Value of Trading & available for sale securities (taking into account highly liquid assets)”. The weights of all indicators within the criterion are equal.</div><div>b. The criterion “Interconnectedness” was enlarged with optional indicator “Deposits guaranteed under deposit guarantee system”. The weights of all indicators within the criterion are equal.</div></div>			

	<p>3. An optional indicator “<i>Importance for an IPS of which the entity is a member</i>” was used to designate additional two institutions (Bank Polskiej Spółdzielczości SA and SGB-Bank SA) as O-SIIs.</p>																											
4.4 Calibrating the O-SII buffer	<p>The O-SII buffer was calibrated using a proportional method. For institutions identified as O-SII (in line with abovementioned stages), the buffer rate was calibrated as followed:</p> <table><tr><th>Number of basket</th><th>Score range</th><th>O-SII buffer rate</th></tr><tr><td>I</td><td>(0-350)</td><td>0.25%*</td></tr><tr><td>II</td><td><350-700)</td><td>0.25%</td></tr><tr><td>III</td><td><700-1050)</td><td>0.50%</td></tr><tr><td>IV</td><td><1050-1400)</td><td>1.00%</td></tr><tr><td>V</td><td><1400-1750)</td><td>1.50%</td></tr><tr><td>VI</td><td><1750-2100)</td><td>2.00%</td></tr><tr><td>VII</td><td><2100-2450)</td><td>2.50%</td></tr><tr><td>VIII</td><td><2450-10000)</td><td>3.00%</td></tr></table> <p>* Refers only to entities identified with an optional indicator “<i>Importance for an IPS of which the entity is a member</i>”.</p> <p>The calibration is two stage:</p> <ol style="list-style-type: none">1. The entities are distributed on the baskets in line with the table above, basing on the score calculated according to point 1. in section 4.3.2. The entities are moved on the baskets with higher O-SII buffer rates in line with the table above, basing on the score calculated according to point 2. in section 4.3. The change of basket is only upwards – the downward movements are excluded.	Number of basket	Score range	O-SII buffer rate	I	(0-350)	0.25%*	II	<350-700)	0.25%	III	<700-1050)	0.50%	IV	<1050-1400)	1.00%	V	<1400-1750)	1.50%	VI	<1750-2100)	2.00%	VII	<2100-2450)	2.50%	VIII	<2450-10000)	3.00%
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VIII	<2450-10000)	3.00%																										
4.5 Effectiveness and proportionality of measure	<p>Setting the O-SII buffer will have positive impact on the resilience of the bank to external shocks, as well as the soundness of the overall banking sector and the real economy in Poland. The applied measure is proportional with respect to the overall score of the given institution and the level of concentration in the Polish banking sector.</p>																											
5. Sufficiency, consistency and non-overlap of the policy response																												
5.1 Sufficiency of the policy response	<p>As the O-SII buffers provide an additional loss absorbing capacity, thus enhancing the resilience of the O-SIIs. Given the relevance of the ten O-SIIs to the domestic financial sector and their impact on systemic risk within the financial system, the calibrated – according to the domestic methodology – O-SII buffer rates of the identified entities are sufficient.</p>																											
5.2 Consistency of application of the policy response	<p>The O-SII buffers contribute to fulfilling objective 2(e) of ESRB 2013/1 to “Strengthen the resilience of financial infrastructures”. The consistency of application of the policy response is realized by applying one methodology on all banks and by annual review. In line with the methodology, the buffer rates depend on the O-SII scores, which represent the relevance of the institutions and their impact on the financial sector.</p>																											

5.3 Non-overlap of the policy response	There are no other macroprudential policy instruments used to address the structural risk represented by the size of the systemic banks.																																		
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 effects are negligible due to insignificant scale of cross-border activities of domestic banks.																																		
6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State	The research carried out so far shows no signs of such effects.																																		
7. Combinations and interactions with other measures																																			
7.1 Combinations between G-SII and O-SII buffers (Article 131.14)	n.a.																																		
7.2 Combinations with systemic risk buffers (SyRBs) (Article 131.15 CRD)	<table><tr><th>Name of institution</th><th>O-SII buffer</th><th>G-SII buffer</th></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></table>			Name of institution	O-SII buffer	G-SII buffer		%	%		%	%		%	%																				
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	<p>Pursuant to the regulation of the Minister of Finance (Dz.U. [Journal of Laws] of 2020, item 473), the obligation to maintain the systemic risk buffer (SRB) was repealed as of 19 March 2020. The SRB at the rate of 3% – had been in force in Poland since 1 January 2018. The SRB applied for all domestically authorised credit institutions in Poland and covers all domestic exposures</p>																																		
	<table><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><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></table>			Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O-SII and SyRB rates		%		%		%		%		%		%		%		%		%		%		%		%		%		%
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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).

7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)	<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><i>No.</i></p> <table border="1" data-bbox="571 313 1423 622"> <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>mBank SA</td><td>Commerzbank AG</td><td>1.25%</td></tr> <tr> <td>Santander Bank Polska SA</td><td>Banco Santander S.A.</td><td>1.25%</td></tr> <tr> <td>ING Bank Śląski SA</td><td>ING Bank N.V.</td><td>2.00%</td></tr> <tr> <td>BNP Paribas Bank Polska SA</td><td>BNP Paribas</td><td>1.50%</td></tr> <tr> <td>Bank Millennium SA</td><td>Banco Comercial Português, S.A.</td><td>1.00%</td></tr> <tr> <td>Bank Handlowy w Warszawie SA</td><td>Citibank Europe plc</td><td>1.00%</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	mBank SA	Commerzbank AG	1.25%	Santander Bank Polska SA	Banco Santander S.A.	1.25%	ING Bank Śląski SA	ING Bank N.V.	2.00%	BNP Paribas Bank Polska SA	BNP Paribas	1.50%	Bank Millennium SA	Banco Comercial Português, S.A.	1.00%	Bank Handlowy w Warszawie SA	Citibank Europe plc	1.00%
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8. Miscellaneous																						
8.1 Contact person(s)/mailbox at notifying authority	<p>Paweł Cywiński, pawel.cywinski@knf.gov.pl, (+48) 22 262 48 73</p> <p>Patryk Toporowski: patryk.toporowski@knf.gov.pl (+48) 22 262 51 76</p> <p>Filip Błazejak: filip.blazejak@knf.gov.pl (+48) 22 262 53 32</p>																					
8.2 Any other relevant information																						
8.3 Date of the notification	<p>Please provide the date on which this notification was uploaded/sent.</p> <p>01/12/2025</p>																					