



Notification template for Article 131 CRD – Other Systemically Important Institutions (O-SIIs)

Template for notifying the ECB and the ESRB on setting or resetting on O-SII buffer under Article 131(7) CRD and on the identification 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 SSM Regulation¹);
- [DARWIN/ASTRA link] when notifying the ESRB.

The ESRB will forward this notification to the European Commission, to 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 after the relevant authorities have adopted and published the notified macroprudential measure².

Uploading/emailing this template to the above-mentioned addresses constitutes an official notification, no further official letter is required. In order to facilitate the work of the notified authorities, please send the notification template in a format that allows electronically copying the information.

1. Notifying national authority			
1.1 Name of the notifying authority	If several designated authorities, please mention all of them. Banka Slovenije		
1.2 Country of the notifying authority	Please provide the country of the notifying authority. Slovenia		
2. Description of the measure			
2.1a Concerned institution or group of institutions	On which institution(s) is the measure applied (name and LEI code)?		
	Is the measure applied on:		
	<ul style="list-style-type: none"> - The highest level of consolidation - A sub-consolidated level - An individual level 		
	Name of institution	LEI	Consolidation level
	NOVA LJUBLJANSKA BANKA d.d., Ljubljana (NLB)	5493001BABFV7P27OW30	Consolidated level
	OTP banka d.d. (OTP)	549300J0GSZ83GTKBZ89	Consolidated level
SID - Slovenska izvozna in razvojna banka, d.d., Ljubljana (SID)	549300BZ3GKOJ13V6F87	Consolidated level	
Banka Intesa Sanpaolo d.d. (Intesa)	549300ECJDDLOVWWL932	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 The notifying authority may request, and the Head of the ESRB Secretariat may approve, that for reasons of confidentiality or financial stability this notification or part of it should not be published.

	<table border="1"> <tr> <td>Sanpaolo)</td><td></td><td></td></tr> <tr> <td>UNICREDIT BANKA SLOVENIJA d.d. (UniCredit)</td><td>549300O2UN9JLME31F08</td><td>Individual level</td></tr> </table>	Sanpaolo)			UNICREDIT BANKA SLOVENIJA d.d. (UniCredit)	549300O2UN9JLME31F08	Individual level																		
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2.1b Changes in the list of concerned institutions	<p>Please indicate any changes in the list under 2.1a compared to the last notification, and provide an explanation, if applicable.</p> <p>The only change compared to the last notification concerns SID banka, where the level of consolidation has been adjusted due to the planned reorganisation and the establishment of a non-bank holding company for managing equity investments within the SID group.</p>																								
2.2 Level of the buffer applied	<p>What is the level of the buffer (in %) applied to the institution(s)?</p> <table border="1"> <thead> <tr> <th>Name of institution</th><th>Fully phased in buffer level</th><th>Change compared to last notification</th></tr> </thead> <tbody> <tr> <td>NLB d.d.</td><td>1.25%</td><td></td></tr> <tr> <td>OTP banka d.d.</td><td>1.00%</td><td></td></tr> <tr> <td>SID banka d.d.</td><td>0.50%</td><td></td></tr> <tr> <td>UniCredit Banka Slovenija d.d.</td><td>0.25%</td><td></td></tr> <tr> <td>Banka Intesa Sanpaolo d.d.</td><td>0.25%</td><td></td></tr> </tbody> </table>	Name of institution	Fully phased in buffer level	Change compared to last notification	NLB d.d.	1.25%		OTP banka d.d.	1.00%		SID banka d.d.	0.50%		UniCredit Banka Slovenija d.d.	0.25%		Banka Intesa Sanpaolo d.d.	0.25%							
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2.3 Name of the EU ultimate parent institution	<p>Please provide the name and the LEI code of the EU ultimate parent institution of the group of each of the identified O-SIIs, in case the EU ultimate parent institution is not the concerned institution itself.</p> <table border="1"> <thead> <tr> <th>Name of identified O-SII</th><th>EU ultimate parent institution</th><th>LEI of ultimate parent institution</th></tr> </thead> <tbody> <tr> <td>OTP</td><td>OTP Bank Nyrt.</td><td>529900W3MOO00A18X956</td></tr> <tr> <td>Unicredit</td><td>UniCredit S.p.a.</td><td>549300TRUWO2CD2G5692</td></tr> <tr> <td>Intesa Sanpaolo</td><td>Intesa Sanpaolo S.p.a.</td><td>2W8N8UU78PMDQKZENC08</td></tr> </tbody> </table>	Name of identified O-SII	EU ultimate parent institution	LEI of ultimate parent institution	OTP	OTP Bank Nyrt.	529900W3MOO00A18X956	Unicredit	UniCredit S.p.a.	549300TRUWO2CD2G5692	Intesa Sanpaolo	Intesa Sanpaolo S.p.a.	2W8N8UU78PMDQKZENC08												
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2.4 Names of subsidiaries	<p>If any of the identified O-SIIs is a parent institution and the buffer is applied on a (sub)consolidated level, please name the subsidiaries of the institution that are notified as O-SIIs (please give name and LEI code).</p> <p>Not applicable</p> <table border="1"> <thead> <tr> <th>Name of identified parent O-SII</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> <tr><td></td><td></td><td></td></tr> </tbody> </table>	Name of identified parent O-SII	Name of O-SII subsidiary	LEI of O-SII subsidiary																					
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3. Timing of the measure																									
3.1 Timing of the decision	<p>What is the date of the official decision? <u>For SSM countries when notifying the ECB</u>: provide the date when the decision referred to in Article 5 of the SSMR shall be taken.</p> <p>The final official decision is expected to be reached by 12/11/2025</p>																								
3.2 Timing of the publication	<p>What is the date of publication of the notified measure?</p> <p>01/12/2025 (expected)</p>																								

3.3 Disclosure	<p>Information about the communication strategy of the notified measure to the market.</p> <p>If available, please provide a link to the public announcement.</p> <p>The list of designated O-SIIs and the corresponding buffer rates will be updated on the website of Banka Slovenije in the first week of December, 2025.</p>																																				
3.4 Timing of application	<p>What is the intended date of activation (i.e. as of which date shall the measure be applicable)?</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>There is no intended phase-in timeline of the measure. All O-SIIs are expected to meet the macroprudential requirements from 1 January 2026.</p>																																				
3.6 Review of the measure	<p>When will the measure be reviewed (Article 131(6) and 131(12) specify that the buffer, the identification of O-SIIs and the allocation into subcategories must be reviewed at least annually)?</p> <p>The list of designated institutions as well as the applicable buffer levels will be reviewed on an annual basis (Article 242 of the Banking Act (ZBan-3) valid as of 23 July 2021.)</p>																																				
4. Reason for O-SII identification and activation of the O-SII buffer																																					
4.1 Scores of concerned institution or group of institutions, as per EBA guidelines on the assessment of O-SIIs (Article 131.3)	<p>Please list here the name, overall scores and category scores of the identified O-SIIs related to</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" data-bbox="560 1384 1433 1635"> <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>NLB</td><td>1096</td><td>779</td><td>1479</td><td>994</td><td>4348</td></tr> <tr> <td>OTP</td><td>556</td><td>657</td><td>379</td><td>527</td><td>2118</td></tr> <tr> <td>SID</td><td>108</td><td>40</td><td>114</td><td>467</td><td>729</td></tr> <tr> <td>Unicredit Banka</td><td>130</td><td>228</td><td>262</td><td>90</td><td>710</td></tr> <tr> <td>Intesa Sanpaolo</td><td>155</td><td>187</td><td>167</td><td>87</td><td>596</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.</p>	Name of institution	Size	Substitutability	Complexity	Interconnectedness	Overall Score	NLB	1096	779	1479	994	4348	OTP	556	657	379	527	2118	SID	108	40	114	467	729	Unicredit Banka	130	228	262	90	710	Intesa Sanpaolo	155	187	167	87	596
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4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)	<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 We followed the EBA methodology for computing the systemic importance scores. The analysis includes all banks in Slovenia. b. which threshold score has been set to identify O-SIIs Banka Slovenije applies a threshold of 500 basis points in the process of identification of O-SIIs. This year five institutions with 																																				

	<p>scores above 500 basis points have been identified as O-SIIs. The measure will be applied at the highest level of consolidation in Slovenia (dependant on individual bank whether this indicates solo, subconsolidated or consolidated level). None of the other institutions has reached the threshold of 425 basis points, i.e. the highest possible threshold for identification as an O-SII under the EBA Guidelines (EBA/GL/2014/10). Please refer to the attached excel file.</p> <p>c. whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process</p> <p>No credit institutions have been excluded from the assessment. The identification process covers the entire Slovene banking system and the assessment follows the mandatory indicators set as proposed in the EBA's Guidelines (EBA/GL/2014/10).</p> <p>d. 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> <p>No relevant entity has been excluded from the identification process. Please find the complete list of institutions in the attached excel file.</p> <p>e. whether non-bank institutions have been included in the calculations</p> <p>No non-bank institution has been included in the calculations.</p>
4.3 Supervisory judgement	<p>Has any of the institutions listed in 2.1 been identified through 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> <p>a. which of the optional indicators have been used to justify supervisory assessment decisions, if any, and what are the scores</p> <p>b. why these optional indicators are relevant for the Member State</p> <p>c. why the bank is systemically important in terms of those particular optional indicators</p> <p>No institution has been identified as an O-SII through supervisory judgement.</p>
4.4 Calibrating the O-SII buffer	<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>The level of the O-SII buffer and the allocation of banks into buckets with equal buffer rates are primarily determined by the scores obtained in the assessment of systemic importance, based on the EBA Guidelines (EBA/GL/2014/10). The methodology for determining the O-SII buffer rate was first approved by the Governing Council of Banka Slovenije at its 587th meeting on 10 October 2017. In 2023, the Governing Council adopted a revised methodology at its 707th meeting on 18 July 2023 and subsequently amended it at its correspondence meeting in October 2025. The <i>Regulation on Determining the Capital Buffer for Other Systemically Important Banks</i> was published in the <i>Official Gazette of the Republic of Slovenia</i> (Official Gazette of the RS, No. 78/25 of 10 October 2025).</p> <p>While the buffer rate for each O-SII is mechanically derived from its systemic importance score, the new Regulation allows the designated authority, based on discretionary judgment, to determine a higher rate than the minimum prescribed for the respective score range when warranted by structural characteristics of the institution or risks not fully captured by the</p>

indicators used in the scoring framework. In accordance with the new Regulation, if Banka Slovenije decides to set a higher buffer rate than the minimum, this decision must be supported by an adequate justification and key underlying reasons.

This discretionary element ensures greater flexibility and alignment with the ECB's framework. The new framework for setting O-SII buffer rates (see the table below) was first applied in the 2025 regular annual exercise for the identification of O-SIIs and the calibration of O-SII buffer rates.

Score	Minimum capital buffer
500–749	0.25%
750–1299	0.50%
1300–1949	0.75%
1950–2699	1.00%
2700–4449	1.25%
4450–...	1.50%

For SID Banka, Banka Slovenije decided to maintain the existing O-SII buffer rate of 0.50%, although the mechanical calculation would have placed the bank in a lower bucket corresponding to a 0.25% buffer. The decision to retain the higher rate was based on the following considerations:

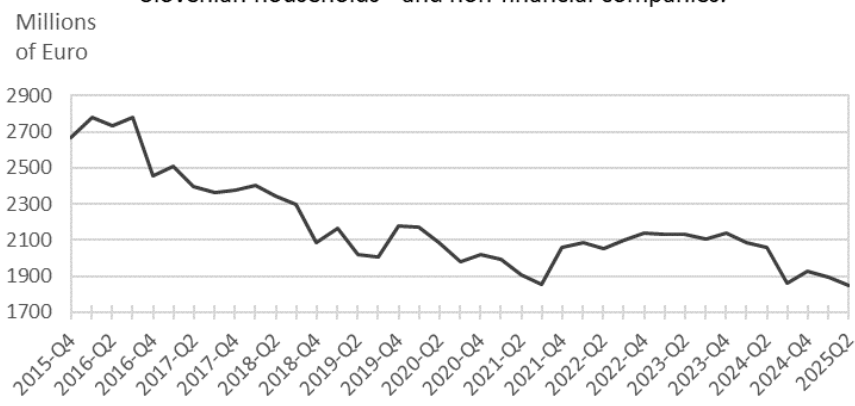
- Expected structural changes and increased group complexity:** SID Banka is undergoing a reorganisation involving the establishment of two subsidiaries, which introduces a new group structure and creates internal relationships that are not yet fully reflected in the indicators used in the O-SII methodology. While the bank will retain full ownership (both direct and indirect) and consolidated risk management, new internal capital, financial, and operational flows will emerge between the parent bank and its subsidiaries. These flows will not directly affect the consolidated O-SII score but may indirectly influence the group's relationships and financial linkages with the rest of the financial system, which cannot yet be fully assessed within the current O-SII framework. Such structural adjustments may temporarily increase the group's sensitivity to disturbances in specific parts of its operations. Maintaining the current buffer level (0.50%) is therefore considered a precautionary measure during the transitional period until the new group structure is fully established and the stability of consolidated risk management and the bank's business model is confirmed. In addition, the transfer of equity-financing activities and the establishment of separate entities for asset management represent a reorganisation towards a more complex development-bank business model, with a broader institutional structure and multi-layered governance arrangements. This evolution requires time for the adjustment of processes, internal controls, and reporting, and is thus regarded as a period of increased organisational complexity. Maintaining the current buffer (0.50%) is therefore justified as a temporary prudential safeguard until the new structure is fully stabilised.
- Transitional timing and the need for stability and predictability:** O-SII buffers are intended to reflect the structural and more permanent characteristics of systemically important institutions. If SID Banka's buffer were reduced to the minimum level in 2026 and subsequently raised again at the next regular review, the higher rate would not take effect before 2028. Given the narrow margin (only 21 basis points below the next threshold) and the ongoing structural changes, an upward

	<p>revision at the next review cannot be ruled out.</p> <p>During the interim period, the bank's capital protection would be lower than warranted by its current position and activities amid the reorganisation. Maintaining the existing buffer of 0.50% therefore ensures continuity and stability in capital requirements and preserves the consistency of the macroprudential framework during the transition.</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>The failure of a systemic institution could have severe negative impact on the financial system and the real economy. To prevent such events, a capital surcharge is applied to institutions that bear a significant systemic importance and can therefore create higher risks to financial stability. More precisely, the aim of the O-SII buffer is to increase the loss-absorbing capacity of such institutions. In the Slovenian banking system, the five identified O-SIIs represent 82% of the system's total assets.</p>
5 Sufficiency, consistency and non-overlap of the policy response	
5.1 Sufficiency of the policy response	<p>In order for macroprudential policy to be considered as 'sufficient', the policy responses are expected 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 for assessing the sufficiency of the macroprudential policy in the Member States. Please provide any additional information that the ESRB should consider during its assessment of the sufficiency of the policy response.</p> <p>In the context of policy sufficiency, the measure is calibrated in a way that it meets the policy objective (to limit the systemic impact of misaligned incentives with a view to reducing moral hazard and to additionally reduce externalities caused by interconnectedness) and that it ensures that benefits exceed costs (see 4.4. for calibration approach).</p> <p>Bank of Slovenia meaningfully uses the EBA methodology to regularly identify O-SIIs and to assess their importance to the financial system. The reason for the special treatment of O-SIIs is that their failure may endanger financial stability, which may lead to significantly larger adverse effects on the financial system and the entire economy compared to failure of systemically less significant institution (please also see 4.5). Other systemically important institutions are identified based on the size, importance, complexity and, cross-border activity, and interconnectedness. The capital buffer for each identified O-SII is set according to the Regulation on Determining the capital buffer for other systemically important banks (Official Gazette of the RS No 78/25).</p>
5.2 Consistency of the application of the policy response	<p>In order for macroprudential policy to be considered as 'consistent', the policy instruments should follow their relevant objective as outlined in ESRB/2013/1 and they should be implemented in accordance with the common principles detailed within the relevant legal text.</p> <p>Note that the ESRB assessment of consistency will incorporate whether the same systemic risks are addressed in a similar way both across and within the Member States over time. Please provide any additional information that the ESRB should consider during its assessment of the consistency of the policy response.</p>

	<p>The O-SII buffer presents an additional capital buffer requirement for banks that are designated as O-SIIs. Its objective is to strengthen the resilience of systemically important institutions and thereby reduce the probability and systemic impact of bank distress. By increasing loss-absorbing capacity in going concern, the buffer limits negative externalities (contagion, fire-sales and disruption of critical functions) and supports continuity of lending in stress. The O-SII buffer complements, rather than duplicates, the resolution framework and MREL, which address loss-absorption and recapitalisation in gone-concern. This framing is consistent with EU guidance and ongoing efforts to ensure a transparent, risk-based and consistent application across jurisdictions (see also 5.1).</p>
<p>5.3 Non-overlap of the policy response</p>	<p>In order for a policy instrument to be considered as 'non-overlapping', it should aim to address a systemic risk that either differs to the risk addressed by other active tools in the same Member State, or to 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 necessity to use more than one instrument to address the same systemic risk and how the different instruments interact with each other. <p>No other policy instruments are currently applied to address the same systemic risk.</p>
<p>6 Cross-border and cross-sector impact of the measure</p>	
<p>6.1 Assessment of cross-border effects and the likely impact on the internal market (Recommendation ESRB/2015/2)</p>	<p>Assessment of the cross-border effects of the 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 Macro-prudential Policy in the Banking Sector³ 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>a.1. (Cross-border) risk adjustment: in order to avoid being designated as an O-SII or to make less (more) likely a future increase (decrease) in the bank-specific O-SII buffer rate, financial service providers might reduce their exposures outside Slovenia. Should this happen, it would be a positive effect for Slovenia, as it contributes to reduce the systemic importance of the considered bank and the related potential moral hazard typical of too-big-to-fail institutions. The resulting reduction in financial vulnerabilities in Slovenia lowers the risk of possible contagion to other countries, whose financial systems or economies are, for any reason, connected.</p> <p>a.2. Regulatory arbitrage: in order to avoid the O-SII buffer requirement, foreign financial service providers might:</p> <p>a.2.1. convert their subsidiaries in Slovenia into branches: the probability of this to happen is small as long as the size of exposures to Slovenia of these foreign financial service providers remains small compared to their total exposures;</p> <p>a.2.2. transfer capital-intensive activities (like derivatives) to special</p>

³ Available on the ESRB's website at www.esrb.europa.eu.

	<p>purpose vehicles: in our case, since the measure applies to the highest level of consolidation in Slovenia, the risk of cross-border effects through this channel is assessed as non-material.</p> <p>b. Assessment of:</p> <p>b.1. cross-border effects of the implementation of the measure in your own jurisdiction (inward spillovers);</p> <p>Our assessment of inward spillover effects of the O-SII buffer relies on the following considerations:</p> <p>b.1.1. Since a higher capital buffer means a higher cost of lending for banks, an O-SII might transfer this higher cost to borrowers, who in turn might redirect their borrowing request abroad. Should this happens, the inward effect for Slovenia would be positive, because it contributes towards the reduction of the systemic importance of that O-SII. Consequently, the measure becomes more effective at limiting moral hazard by too-big-to-fail institutions.</p> <p>b.1.2. An O-SII might (want to) countervail a potential contraction in lending (see point b.1.1 above) by increasing other (and maybe riskier and more complex) types of exposures, like riskier foreign exposures with higher expected profits. However, the criteria for O-SII designation take into account the bank's increase in complexity and expansion of cross-border activity. Therefore, we can overall expect that the described cross-border effect would be non-material.</p> <p>b.1.3. The application of the O-SII buffer creates incentives for capital regulatory arbitrage, i.e. conversion of subsidiaries of foreign financial service providers into branches. As mentioned in point a.2.1 above, the probability that foreign financial service providers will convert their subsidiaries in Slovenia into branches is assessed to be currently negligible.</p> <p>b.2. cross-border effects on other Member States and on the Single Market of the measure (outward spillovers);</p> <p>Our assessment of outward spillover effects of the O-SII buffer relies on the following considerations:</p> <p>b.2.1. The application of the O-SII buffer brings about positive outward effects as the reduced risk of financial instability in Slovenia also lowers the risk of possible contagion to other countries, whose financial systems or economies are, for any reason, connected.</p> <p>b.2.2. In order to avoid the O-SII buffer requirement, foreign financial service providers might transfer capital-intensive activities (like derivatives) to special purpose vehicles: in our case, since the measure applies to the highest level of consolidation in Slovenia, the risk of cross-border effects through this channel is assessed as non-material.</p> <p>Specifically, the change in the measure compared to the last notification includes a change in the consolidation level for SID bank (from individual to consolidated level) and a reduction in the related buffer for the same bank (from 0.5% to 0.25%). Therefore, we do not expect the materialization of the effects described at points b.1.1-b.1.3 and b.2.2. On the other hand, the reduction in the O-SII buffer for SID bank is justified by the decrease in its</p>
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	<p>systemic importance. Therefore, the change in the buffer rate for SID bank is not expected to undermine its resilience and loss-absorbing capacity and, consequently, is not expected to result in a worsening of contagion risk for other Member States and the Single Market.</p> <p>b.3. overall impact on the Single Market of the implementation of the measure.</p> <p>b.3.1. Summing up the information provided in the previous bullet points, the overall impact on the Single Market of the implementation of the O-SII buffer is positive. The measure helps reduce the issues related to moral hazard by too-big-to-fail institutions, direct and indirect contagion (by restraining O-SIIs' foreign and riskier exposures) and to increase the O-SIIs' resilience. The small reduction in the buffer rate for SID bank is justified and is not expected to have a negative impact on the Single Market.</p> <p>b.3.2. Finally, the Bank of Slovenia monitors regularly whether there is any significant change in cross-border exposures that could constitute or signal negative inward or outward effects of the implemented O-SII buffer. In particular, in light of the criteria and expert judgement described above, the amount of borrowing from abroad by households and NFCs is monitored as an indicator of cross-border effects of the OSII buffer. Figure 1 shows no noticeable increase in this indicator that would signal the existence of negative cross-border effects.</p> <p style="text-align: center;">Figure 1: Loans from EU Member States (excl. Slovenia) to Slovenian households* and non-financial companies.</p>  <p>*Note: Loans to households here also include loans to non-profit institutions serving households.</p>
<p>6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State</p>	<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>Since the O-SII buffer applies at the highest level of consolidation in Slovenia, banks do not have incentives to transfer capital-intensive activities (like derivatives) to special purpose vehicles, because this will not help them to circumvent the measure. Therefore, the risk of cross-border</p>

	<p>effects through this channel is assessed as non-material.</p> <p>Some of the banks identified as O-SIIs are subsidiaries of foreign banks. These latter might have an incentive to convert such subsidiaries into branches</p> <p>However, as explained in section 6.1 (in particular at point a.2.1 e a.2.2), the risk of regulatory arbitrage is deemed negligible.</p>																								
7 Combinations and interactions with other measures																									
7.1 Combinations between G-SII and O-SII buffers (Article 131.14)	<p>In case both G-SII and O-SII criteria applied to the same institution at the consolidated level, which of the two buffers is the highest?</p> <p>Not applicable, as no bank in Slovenia is subject to both an O-SII and G-SII buffer on a consolidated basis.</p>																								
7.2 Combinations with SyRB (Article 131.15)	<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> <div><div>a. What is the size of the systemic risk buffer rates(s)?</div><div>b. What is the level of application on the systemic risk buffer rate(s) (i.e. level of consolidation and/or individual)?</div><div>c. Is the sum of the systemic risk buffer rate(s) and the O-SII buffer rate to which the same institution is subject to higher than 5 %?</div></div> <p>The requirement to maintain a sectoral systemic risk buffer is introduced for all banks in relation to sectoral exposures in the Republic of Slovenia referred to in the first and second indents of point 4 of the first paragraph of Article 247 of the Banking Act, in the following amount:</p> <div><div>• 0.5 % for all retail exposures to natural persons secured by residential immovable property;</div><div>• 0.5 % for all other exposures to natural persons.</div></div> <p>As of 2023 Slovenian banks comply with the requirements for maintaining a systemic risk buffer. The systemic risk buffer rate for all retail exposures to individuals secured by residential real estate was reduced from 1.0% to 0.5% of the total risk exposure amount. Banks will be able to apply the new buffer rate from 1 January 2025. The measure is applied at the highest level of consolidation in Slovenia (dependant on individual bank whether this indicates solo, subconsolidated or consolidated level).</p> <p>There is no case where the sum of the systemic risk buffer rate(s) and the O-SII buffer rate to which the same institution is subject to exceeds 5 % (please refer to the table below).</p> <table><tr><th>Name of institution</th><th>SyRB rate</th><th>SyRB level of application</th><th>Sum of O-SII and SyRB rates</th></tr><tr><td>NLB</td><td>0.5 % and 0.5 %</td><td></td><td>2.25 %</td></tr><tr><td>OTP</td><td>0.5 % and 0.5 %</td><td></td><td>2.00 %</td></tr><tr><td>SID</td><td>0.5 % and 0.5 %</td><td></td><td>1.50 %</td></tr><tr><td>Intesa Sanpaolo</td><td>0.5 % and 0.5 %</td><td></td><td>1.25 %</td></tr><tr><td>Unicredit Banka</td><td>0.5 % and 0.5 %</td><td></td><td>1.25 %</td></tr></table>	Name of institution	SyRB rate	SyRB level of application	Sum of O-SII and SyRB rates	NLB	0.5 % and 0.5 %		2.25 %	OTP	0.5 % and 0.5 %		2.00 %	SID	0.5 % and 0.5 %		1.50 %	Intesa Sanpaolo	0.5 % and 0.5 %		1.25 %	Unicredit Banka	0.5 % and 0.5 %		1.25 %
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7.3 O-SII requirement for a subsidiary (Article 131.8)	<p>In case the O-SII is a subsidiary of an EU parent institution which is 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>Is the subsidiary cap preventing the implementation of a higher O-SII buffer according to the domestic buffer setting methodology?</p> <p>There are no obstacles to the implementation of the set buffer rates for the</p>																								

	O-SII in the table <table border="1"> <thead> <tr> <th data-bbox="560 235 874 322">Name of O-SII subsidiary</th><th data-bbox="874 235 1235 322">Name of the EU parent of the O-SII subsidiary</th><th data-bbox="1235 235 1406 322">Buffer applicable to O-SII EU parent</th></tr> </thead> <tbody> <tr> <td data-bbox="560 322 874 358">OTP</td><td data-bbox="874 322 1235 358">OTP Bank Nyrt.</td><td data-bbox="1235 322 1406 358">2.00%</td></tr> <tr> <td data-bbox="560 358 874 394">Unicredit</td><td data-bbox="874 358 1235 394">UniCredit S.p.a.</td><td data-bbox="1235 358 1406 394">1.50%</td></tr> <tr> <td data-bbox="560 394 874 430">Intesa Sanpaolo</td><td data-bbox="874 394 1235 430">Intesa Sanpaolo S.p.a.</td><td data-bbox="1235 394 1406 430">1.25%</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	OTP	OTP Bank Nyrt.	2.00%	Unicredit	UniCredit S.p.a.	1.50%	Intesa Sanpaolo	Intesa Sanpaolo S.p.a.	1.25%
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8 Miscellaneous													
8.1 Contact person(s)/mailbox at notifying authority	<p>Contact person(s) (name, phone number and e-mail address) and mailbox for further inquiries.</p> <p>Meta Ahtik, tel.: +386 1 47 19 350, email: meta.ahtik@bsi.si</p> <p>Borut Poljšak, tel.: +386 1 47 19 363, email: borut.poljsak@bsi.si</p> <p>Monika Tepina, tel.: +386 1 47 19 369, email: monika.tepina@bsi.si</p> <p>Marija Drenkovska, tel.: +386 1 47 19 678, email: marija.drenkovska@bsi.si</p>												
8.2 Any other relevant information	/												
8.3 Date of the notification	<p>Please provide the date when this notification was uploaded/sent.</p> <p>14/10/2025 (early interaction)</p>												