

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);
- notifications@esrb.europa.eu 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	Central Bank of Iceland													
1.2 Country of the notifying authority	Iceland.													
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>Arion banki hf.</td> <td>RIL4VBPD0M7Z3KXSF19</td> <td>Highest level of consolidation</td> </tr> <tr> <td>Íslandsbanki hf.</td> <td>549300PZMFIQR79Q0T97</td> <td>Highest level of consolidation</td> </tr> <tr> <td>Landsbankinn hf.</td> <td>549300TLZPT6JELDWM92</td> <td>Highest level of consolidation</td> </tr> </tbody> </table>		Name of institution	LEI	Consolidation level	Arion banki hf.	RIL4VBPD0M7Z3KXSF19	Highest level of consolidation	Íslandsbanki hf.	549300PZMFIQR79Q0T97	Highest level of consolidation	Landsbankinn hf.	549300TLZPT6JELDWM92	Highest level of consolidation
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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.

2.1b Changes to the list of institutions concerned	<p>Please indicate under 2.1a any changes to the list as compared to the last notification, and provide an explanation, if applicable.</p> <p>No changes</p>																								
2.2 Level of the buffer applied	<p>At what level is the fully phased-in buffer (in %) applied to the institution(s)?</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>Arion banki hf.</td><td>3%</td><td>3%</td></tr> <tr> <td>Íslandsbanki hf.</td><td>3%</td><td>3%</td></tr> <tr> <td>Landsbankinn hf.</td><td>3%</td><td>3%</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 institution	New O-SII buffer	Previous O-SII buffer	Arion banki hf.	3%	3%	Íslandsbanki hf.	3%	3%	Landsbankinn hf.	3%	3%									
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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> <p>The institutions are in all cases the ultimate parent institutions.</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></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 O-SII	Ultimate EU parent institution	LEI of ultimate parent institution																		
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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> <p>N/A</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. Timing for the measure																									
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>02/12/2025</p>																								

3.2 Timing for publication	What is the date of publication of the notified measure? 03/12/2025																																																						
3.3 Disclosure	Information about the strategy for if the communicating the notified measure to the market. All information on decisions regarding capital buffers is available on the Central Bank's website, see here: https://cb.is/financial-stability/macprudential-policy/capital-buffers/																																																						
3.4 Timing for application	What is the intended date of application of the measure? 04/12/2025																																																						
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3.6 Review of the measure	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)? The measure will be reviewed during Q3 or Q4 of 2026																																																						
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. <p>According to TITLE II of EBA guidelines the scores are as follows.</p> <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>Arion banki hf.</td><td>2650</td><td>2759</td><td>3134</td><td>3200</td><td>2936</td></tr> <tr> <td>Íslandsbanki hf.</td><td>2633</td><td>2669</td><td>2562</td><td>3706</td><td>2892</td></tr> <tr> <td>Landsbankinn hf.</td><td>3573</td><td>3619</td><td>3286</td><td>2237</td><td>3179</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> <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> <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	Arion banki hf.	2650	2759	3134	3200	2936	Íslandsbanki hf.	2633	2669	2562	3706	2892	Landsbankinn hf.	3573	3619	3286	2237	3179																														
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	<p>The Financial Stability Committee of the Central Bank of Iceland uses the EBA guidelines as part of the assessment procedure for systemic importance of financial institutions in Iceland.</p> <p>Mandatory indicators are used according to TITLE II of the guidelines and scores calculated as the first step in the process of informing the committee of systemic importance.</p> <p>In step two of the process (TITLE III of the guidelines) one additional indicator is used in the Importance category. The additional indicator measures financial institutions' share of FX market turnover. This additional indicator is used due to the systemic importance of the FX market for the domestic economy. Also, one institution is added to the assessment due to its relatively large exposures to households and corporates as well as significant outstanding debt securities. Scores are calculated and compared with scores from the previous step. Expert assessment is then used to determine which institutions should be classified as O-SII. According to the Act on the Central Bank and the Act on financial institutions financial institutions should not be identified as O-SII unless their operations can affect financial stability. Expert assessment is therefore needed. The expert assessment of the Committee includes a detailed examination of business plans and operations of financial institutions as well as examination of individual indicator scores from the first and second step of the process. Due to relatively low amounts governing scores for some of the indicators mandated by the EBA guidelines, they are not relevant to financial stability in Iceland. Less emphasis is therefore given to some of the indicators when assessing systemic importance.</p> <p>In order to take account of the specificities of the banking sector in Iceland and the resulting statistical distribution of the scores, also ensuring the homogeneity of the group of O-SII's designated, the threshold, mandated in the guidelines, is used as a reference but not as a final determinant. An expert assessment by the Committee is used to determine systemic importance of Icelandic financial institutions, taking all the above-mentioned factors into consideration.</p>
<p>4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)</p>	<p>Please provide information on:</p> <ol style="list-style-type: none"> whether you followed the EBA guidelines on the assessment of O-SIIs; which threshold score has been set to identify O-SIIs; whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process; 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); whether non-bank institutions have been included in the calculations. <ol style="list-style-type: none"> See 4.1. In order to take account of the specificities of the banking sector in Iceland and the resulting statistical distribution of the scores, also ensuring the homogeneity of the group of O-SII's designated the threshold is not used. Expert assessment of the Financial Stability Committee is used to determine systemic importance of Icelandic financial institutions (see 4.1. for details) No institutions are excluded from the identification process. Scores of relevant institutions not identified as O-SII are not published. One non-bank institution is included in the calculations in the second step of the identification process, but not identified as O-SII as the institution falls out of scope of the buffer requirement and CRD.

4.3 Supervisory judgement	<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>N/A</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>As all institutions identified as O-SII have very similar importance to the Icelandic financial system and economy. The three banks, identified as O-SII, combined received 86% of points assigned in the identification process, with each of them receiving 28-30% (29-32% according to TITLE II of EBA GL). In terms of total assets, the banks' share in the size of the financial system was 80%. Their share in private sector deposits was 94%, and their share in private sector lending was just under 90%. The three banks also held a substantial share of the financial system's cross-border assets (88%) and liabilities (95%). It is therefore clear that each of the banks is systemically important at the national level, as the failure of any one of them would likely have a severely negative impact on financial stability in Iceland, as well as spreading to other financial institutions and to the economy more broadly.</p> <p>Therefore a 3% buffer has therefore been applied to all O-SII banks. If the need arises a bucketing approach will be considered in line with the approach EBA has proposed.</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 combined size of the three institutions identified as O-SII represents about 81.5% of the assets of the domestic financial sector (taking into account one non-bank institution). Their share in private sector deposits was 93%, and their share in private sector lending was just under 90%. The three banks also held a substantial share of the financial system's cross-border assets (85%) and liabilities (95%). The banks provide important services to the real economy, both to companies and households.</p> <p>The O-SII buffer applicable to Icelandic banks was calibrated accounting for the banks' systemic importance. The structure of the Icelandic financial sector is such that there are three very large and systemically important institutions that dominate the market with five very small savings and loans banks, mostly operating in rural areas, one small commercial bank and a few small financing companies. The failure of one of the O-SII could have widespread negative effects and result in contagion effects to other banks, due to deteriorating credit ratings, and access to foreign financial markets might be affected for all banks.</p> <p>Capital buffers reduce the risk of failure of systemically important institutions and thus the probability of negative effects on the real economy.</p> <p>Given the above considerations and the assessment of systemic importance according to the EBA guidelines, a 3% CET1 level of the O-SII buffer is considered effective and proportionate for all three banks identified as O-SIIs.</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>The Central Bank of Iceland deems the buffer requirements sufficient to significantly mitigate the systemic risks of systemic importance. The buffer is intended to mitigate the potential contagion risks and moral hazard related to systemic importance and is sufficient at present, considering the specificities of the Icelandic banking sector and economy. During the time the buffer has been in effect, no unintended effects have been observed, e.g., regarding excessive deleveraging, search for yield, increased risk taking or leakages to the non-bank 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>The Central Bank of Iceland considers the approach used to identify systemically important banks in Iceland to be consistent and in line with relevant legal requirements and guidelines, e.g., the relevant Icelandic legislation implementing CRD and, to a large extent, EBA guidelines (EBA/GL/2014/10). The increased capital requirements associated with the systemic importance mitigates the risk of contagion by bolstering the resilience of systemically important banks. As all three systemically important banks in Iceland adhere to similar business plans and are equivalent in size the capital requirement due to systemic importance is also equivalent.</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>No other measures are used to address the systemic risks related to systemic importance of financial institutions.</p>
6. Cross-border and cross-sector impact of the measure	

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)

<p>6.1 Assessment of cross-border effects and the likely impact on the Internal Market</p> <p>(Recommendation ESRB/2015/2⁴)</p>	<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>Since Icelandic banks have very limited operations in member states of the EU, this measure is very unlikely to have any cross-border effects or impact on the internal market. Also, due to the fact the buffer has been in effect since 2016 and the sum of the O-SII buffer rate and Systemic Risk buffer rate remains unchanged.</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>Possible leakages are very unlikely. Since the O-SII buffer is applied at the highest consolidation level there are no risks of shifts in activity w.r.t. geographical location within groups. Also, the risk of reduced operations in order to be not classified as O-SII does not apply in Iceland since the reduction in operations would need to be extremely large. The banks affected by the measure already maintain the 5% CET1 capital to meet the sum of the O-SII buffer and systemic risk buffer since the introduction of the buffers on 1 April 2016. The impact of the application of the increase in the O-SII buffer and lowering of the systemic risk buffer from 3% to 2%, at this time, is therefore assessed to be neutral w.r.t. lending growth and will have minimal effects on own funds requirements. Leakages to the non-bank sector is a possibility, but this has not been observed since the introduction of the buffers in 2016, nor in relation to the introduction, increase or decrease of other capital buffers.</p>						
<p>7. Combinations and interactions with other measures</p>							
<p>7.1 Combinations between G-SII and O-SII buffers</p> <p>(Article 131.14)</p>	<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</p> <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></table>	Name of institution	O-SII buffer	G-SII buffer		%	%
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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.

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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> <ol style="list-style-type: none"> What is/are the systemic risk buffer rates(s)? At what level is/are the systemic risk buffer rate(s) applied (i.e. consolidation level and/or individual)? 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%? <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>Arion banki hf.</td><td>2%</td><td>Consolidation level, domestic exposures only</td><td>5%</td></tr> <tr> <td>Íslandsbanki hf.</td><td>2%</td><td>Consolidation level, domestic exposures only</td><td>5%</td></tr> <tr> <td>Landsbankinn hf.</td><td>2%</td><td>Consolidation level, domestic exposures only</td><td>5%</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	Arion banki hf.	2%	Consolidation level, domestic exposures only	5%	Íslandsbanki hf.	2%	Consolidation level, domestic exposures only	5%	Landsbankinn hf.	2%	Consolidation level, domestic exposures only	5%		%		%		%		%		%		%		%		%		%		%
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7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)	<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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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>Mr. Einar Jón Erlingsson</p> <p>Tel: +354 569 9600 - einar.jon.erlingsson@sedlabanki.is</p> <p>Mr. Jón Magnús Hannesson</p> <p>Tel: +354 569 9600 – jon.magnus.hannesson@sedlabanki.is</p>																																				

8.2 Any other relevant information	
8.3 Date of the notification	Please provide the date on which this notification was uploaded/sent. 04/12/2025