

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	De Nederlandsche Bank N.V.
1.2 Country of the notifying authority	The Netherlands
2. Description of the measure	
2.1a Institution or group of institutions concerned	The buffer requirements are imposed on the below mentioned institutions on the basis of the highest level of consolidation. In the case of ING, the entity referred to below differs from the entity referred to in section 2.3. The reason is that the relevant provisions in Dutch law transposing Article 131 CRD (i.e. Article 3:62a of the Financial Supervision Act and Article 105c of the Decree on Prudential Rules) prescribe that -if the OSII is a group headed by an EU parent financial holding company- the buffer requirement applies to the credit institution that is the subsidiary of the EU parent financial holding company on the basis of the consolidated financial position of that holding company (the latter being jointly responsible -in accordance with Article 3:273c(a) of the Financial Supervision Act, being the relevant provision in Dutch law transposing Article 3(3) CRD- for the subsidiary credit institution's compliance with the consolidated buffer requirement). Accordingly, all five entities referred to below are required to

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.

	<p>maintain a capital buffer on the basis of the highest level of consolidation, i.e. including the whole supervised group of which either an EU parent institution or an EU parent (mixed) financial holding company is the ultimate EU parent undertaking. The buffer requirements are in line with the provisions in Dutch law transposing Article 131 CRD and do not differ in (consolidation) scope or level from the ones imposed and notified by DNB in previous years.</p> <p>On which institution(s) is the measure applied (name and Legal Entity Identifier (LEI) code)?</p> <p>Is the measure applied at:</p> <ul style="list-style-type: none"> - The highest level of consolidation? - A sub-consolidated level? - An individual level? <table border="1" data-bbox="568 714 1398 1343"> <thead> <tr> <th>Name of institution</th><th>LEI</th><th>Consolidation level</th></tr> </thead> <tbody> <tr> <td>ING Bank N.V. (“ING”)</td><td>3TK20IVIUJ8J3ZU0Q E75</td><td></td></tr> <tr> <td>Coöperatieve Rabobank U.A. (“RABO”)</td><td>DG3RU1DBUFHT4Z F9WN62</td><td></td></tr> <tr> <td>ABN AMRO Bank N.V. (“ABN”)</td><td>BFXS5XCH7N0Y05N IXW11</td><td></td></tr> <tr> <td>BNG Bank N.V. (“BNG”)</td><td>529900GGYMNGRQ TDOO93</td><td></td></tr> <tr> <td>ASN Bank N.V. (“ASN Bank”)</td><td>724500A1FNICHSDF 2I11</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 institution	LEI	Consolidation level	ING Bank N.V. (“ING”)	3TK20IVIUJ8J3ZU0Q E75		Coöperatieve Rabobank U.A. (“RABO”)	DG3RU1DBUFHT4Z F9WN62		ABN AMRO Bank N.V. (“ABN”)	BFXS5XCH7N0Y05N IXW11		BNG Bank N.V. (“BNG”)	529900GGYMNGRQ TDOO93		ASN Bank N.V. (“ASN Bank”)	724500A1FNICHSDF 2I11													
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2.1b Changes to the list of institutions concerned	As of 1 July 2025, ‘de Volksbank’, which was included in the list in previous years, continued under the name of ‘ASN Bank’.																														
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" data-bbox="568 1477 1429 1805"> <thead> <tr> <th>Name of institution</th><th>New O-SII buffer</th><th>Previous O-SII buffer</th></tr> </thead> <tbody> <tr> <td>ING</td><td>2,0%</td><td>2,0%</td></tr> <tr> <td>RABO</td><td>1,50%</td><td>1,75%</td></tr> <tr> <td>ABN</td><td>1,25%</td><td>1,25%</td></tr> <tr> <td>BNG</td><td>0,25%</td><td>0,25%</td></tr> <tr> <td>ASN Bank</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	ING	2,0%	2,0%	RABO	1,50%	1,75%	ABN	1,25%	1,25%	BNG	0,25%	0,25%	ASN Bank	0,25%	0,25%												
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2.3 Name of the ultimate EU parent institution	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.																														

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	ING Bank N.V. (“ING”)	ING Groep N.V. 549300NYKK9MWM7 GGW15																							
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2.4 Names of subsidiaries	For a list of subsidiaries (at publication of the annual report) we refer to: ING Groep N.V.: Annual Report 2024, page 318 2024 ING Group NV annual report																								
	Rabobank Annual Report 2024, page 329 Annual Report 2024																								
	ABN Amro Group, Integrated Annual Report 2024, page 504-505. Integrated Annual Report 2024																								
	BNG Bank Annual Report 2024, page 77 Annual Report BNG Bank 2024																								
	ASN Bank, Integrated Annual Report 2024, page 53, 265 <i>Please note that de Volksbank continued as ASN Bank as of 1 July 2025. Therefore, the annual report is still published under the name of de Volksbank.</i> Annual Report 2024																								
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	Final decision date is: 31/10/2025																																																												
3.2 Timing for publication	We plan on publishing our decision on: 03/12/2025																																																												
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3.5 Phasing in	<p>No phase-in period is required as buffer requirements remain unchanged or are lowered.</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	A next review will take place in 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>The scores of O-SII institutions based on date per 31/12/2024 are shown below</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>ING</td> <td>3.705</td> <td>3.920</td> <td>5.462</td> <td>3.665</td> <td>4.188</td> </tr> <tr> <td>RABO</td> <td>2.284</td> <td>2.021</td> <td>2.230</td> <td>2.005</td> <td>2.135</td> </tr> <tr> <td>ABN</td> <td>1.399</td> <td>1.902</td> <td>1.009</td> <td>1.430</td> <td>1.435</td> </tr> <tr> <td>BNG</td> <td>464</td> <td>304</td> <td>98</td> <td>705</td> <td>393</td> </tr> <tr> <td>ASN Bank</td> <td>268</td> <td>313</td> <td>73</td> <td>188</td> <td>210</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	ING	3.705	3.920	5.462	3.665	4.188	RABO	2.284	2.021	2.230	2.005	2.135	ABN	1.399	1.902	1.009	1.430	1.435	BNG	464	304	98	705	393	ASN Bank	268	313	73	188	210																								
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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> <ol style="list-style-type: none"> whether you followed the EBA guidelines on the assessment of O-SIIs; <i>DNB fully complied with EBA guidelines.</i> which threshold score has been set to identify O-SIIs; <i>350 basis points</i> whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process; <i>NA</i> 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); <i>A separate file with the score will be shared with the EBA</i> whether non-bank institutions have been included in the calculations. <i>NA</i> 																																																												

<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> <p><i>DNB has used the supervisory overlay, as prescribed in the EBA Guideline, to identify one bank (ASN Bank) as an O-SII</i></p> <p>a. which of the optional indicators have been used to justify the supervisory assessment decisions, if any, and what the scores were;</p> <p>(i) number of deposit accounts (ii) deposits guaranteed under deposit guarantee system</p> <p>why these optional indicators are relevant for the Member State;</p> <p>(i) Number of deposit accounts — retail: this indicator belongs to the 'Importance' category. The impact of problems in banks with many retail clients would be relatively high because it would disrupt the access of many depositors to their funds.</p> <p>(ii) Deposits guaranteed under national deposit guarantee system: this indicator belongs to the 'Interconnectedness' category. When a bank fails, depositors will be repaid up to €100,000. The other domestic banks have to share the costs, however, since they guarantee one another's deposits. This is, therefore, a direct contagion channel, as we witnessed in the financial crisis.</p> <p>b. why the bank is systemically important in terms of those particular optional indicators.</p> <p>The abovementioned criteria lead to the classification of one bank as OSII: ASN Bank. This is based on the criterion deposits guaranteed under deposit guarantee system. For its relevance see the previous response.</p>																																	
<p>4.4 Calibrating the O-SII buffer</p>	<p>See sections 4.2 and 4.5.</p>																																	
<p>4.5 Effectiveness and proportionality of measure</p>	<p>In 2023, DNB recalibrated its O-SII methodology based on the Equal Expected Impact Method (EEI). The EEI aims to equalize the expected loss of a systemically important institution to that of a non-systemically important institution by assigning the former with a higher buffer. Effectively, the higher buffer increases the loss absorbing capacity for O-SIIs and thus decreases its probability of default. By doing that the risks these too-big-to-fail institutions pose for the financial stability are internalized.</p> <p>The 2023 methodology update established the following bucketing scheme, which remains unchanged</p> <table border="1" data-bbox="577 1626 996 1904"> <thead> <tr> <th>Bucket</th> <th>range in bps</th> <th>O-SII buffer</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>350 - 600</td> <td>0.25%</td> </tr> <tr> <td>2</td> <td>600 - 775</td> <td>0.50%</td> </tr> <tr> <td>3</td> <td>775 - 1000</td> <td>0.75%</td> </tr> <tr> <td>4</td> <td>1000 - 1275</td> <td>1%</td> </tr> <tr> <td>5</td> <td>1275 - 1675</td> <td>1.25%</td> </tr> <tr> <td>6</td> <td>1675 - 2150</td> <td>1.50%</td> </tr> <tr> <td>7</td> <td>2150 - 2775</td> <td>1.75%</td> </tr> <tr> <td>8</td> <td>2775 - 4650</td> <td>2%</td> </tr> <tr> <td>9</td> <td>4650 - 7800</td> <td>2.50%</td> </tr> <tr> <td>10</td> <td>7800 - max</td> <td>3%</td> </tr> </tbody> </table> <p>Based on the EBA-scores listed under 4.1, the Dutch banks are imposed the following requirements: ING (2%), Rabo (1,50%), ABN (1,25%), BNG (0,25%) and ASN Bank (0,25%).</p>	Bucket	range in bps	O-SII buffer	1	350 - 600	0.25%	2	600 - 775	0.50%	3	775 - 1000	0.75%	4	1000 - 1275	1%	5	1275 - 1675	1.25%	6	1675 - 2150	1.50%	7	2150 - 2775	1.75%	8	2775 - 4650	2%	9	4650 - 7800	2.50%	10	7800 - max	3%
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5. Sufficiency, consistency and non-overlap of the policy response	
5.1 Sufficiency of the policy response	While the size of the Dutch banking sector relative to Dutch GDP has decreased over the past few years, it remains relatively high. Because of this and because of a high level of concentration in the Dutch banking sector, DNB believes that buffers at an appropriate margin above the ECB minimum floor are warranted. There are no indicators that buffers have a significant unintended impact on the general economy, also in light of no amendments to the height of the buffers.
5.2 Consistency of application of the policy response	DNB considers its use of the O-SII buffer to be consistent. The Dutch O-SIIs are subject to an additional capital buffer requirement, which is put in place to enhance their loss-absorption capacity. This reduces both the probability of stress events and their potential impact. In addition, the buffer is also expected to contribute to correcting potential funding subsidies for significant institutions stemming from an implicit government guarantee, so that a level playing field for small and medium-sized (non-systemic) banks is maintained. Moreover, DNB does adhere to the common principles set out in relevant legal texts (e.g. CRD Art 131 or EBA GL 2014/10) when determining the appropriate level of the O-SII buffers, thereby taking into account the level of systemic risk and national specificities such as a concentrated and large sector.
5.3 Non-overlap of the policy response	DNB sees no overlap between its O-SII buffers and other macroprudential instruments and requirements.
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)	<p><u>Assessment of the cross-border effects of implementation of the measure.</u></p> <p><u>Spillover channels operating via risk adjustment:</u> We do not expect any significant and negative cross-border risk adjustments as the O-SII buffers for the banks will remain unchanged.</p> <p><u>Spillover channels operating via regulatory arbitrage:</u> We expect that regulatory arbitrage is very limited given the imposition of the O-SII buffer at the highest level of consolidation. Moreover, since the O-SII buffers are unchanged, we do not expect that this instigates significant regulatory arbitrage behaviour.</p> <p><u>Assessment of the cross-border effects of implementation of the measure in your own jurisdiction (inward spillovers).</u> <u>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.</u> Given that the O-SII buffers are imposed on a consolidated level, and since the buffers will remain unchanged, we do not expect inward or outward spillovers that would create systemic risks. The lack of inward and outward spillovers is supported by the fact</p>

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).

	that in recent years the share of assets of foreign banks compared to total assets of the Dutch banking sector has been relatively stable and since cross-border assets of the five O-SIIs as percentage of their total assets have remained relatively stable over the past years as well.																																
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? Is there scope for "leakages and regulatory arbitrage" in other jurisdictions?</p> <p>The scope for leakages and regulatory arbitrage would be the same in our jurisdiction as in others, and it would consist of O-SII institutions taking measures to reduce their systemic importance, possibly including a shift of activities to non-regulated or other regulated entities. As noted above, given that the O-SII buffer levels will not change, we do not expect the buffers to result in leakages or regulatory arbitrage within the Netherlands.</p>																																
7. Combinations and interactions with other measures																																	
7.1 Combinations between G-SII and O-SII buffers (Article 131.14)	<p>ING is the only O-SII that is also subject to a G-SII buffer. As shown below the O-SII buffer is higher.</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>ING</td> <td>2,0%</td> <td>1,0%</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	ING	2,0%	1,0%		%	%		%	%																				
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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>DNB currently does not impose a systemic risk buffer.</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> </tbody> </table>	Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O-SII and SyRB rates		%		%		%		%		%		%		%		%		%		%		%		%		%		%
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7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)	<p>DNB does currently not impose an O-SII buffer on a subsidiary of an EU parent institution which is subject to a G-SII or O-SII buffer on consolidated basis.</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>Marloes van Schaik, +31629226855, M.L.van.Schaik@dnb.nl</p>																																

	Martien van der Burg, +31629636287, M.J.van.der.Burg@dnb.nl
8.2 Any other relevant information	None
8.3 Date of the notification	Please provide the date on which this notification was uploaded/sent. DNB notified the ESRB on 31/10/2025