# Notification template for Articles 133 and 134(5) of the Capital Requirements Directives (CRD) – Systemic risk buffer (SyRB)

## Template for notifying the European Central Bank (ECB)and European Systemic Risk Board (ESRB) of the setting or resetting of one or more systemic risk buffer rates pursuant to Article 133(9) CRD and to request that the ESRB issue a recommendation to other Member States to reciprocate the measure under Article 134(5) 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) Regulation[1]);
- notifications@esrb.europa.eu when notifying the ESRB.

The ESRB will forward the notification to the European Commission, the European Banking Authority (EBA) and the competent and designated authorities of the Member States concerned without delay. This notification will be made public by the ESRB once the relevant authorities have adopted and published the notified macroprudential measure[2].

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 and scope of the notification** | |
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| **1.1 Name of the notifying authority** | Austrian Financial Market Authority |
| **1.2 Country of the notifying authority** | Austria |
| **1.3 Type of measure (also for reviews of existing measures)** | Which SyRB measure do you intend to implement?<br>☐ Activate a new SyRB<br>☒ Change the level of an existing SyRB<br>☐ Change the scope of an existing SyRB (incl. changes to a subset of institutions or exposures)<br>☐ De-activate an existing SyRB<br>☐ Reset an existing SyRB (review) |

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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authority, it may be agreed with the Head of the ESRB Secretariat that this notification, or a part thereof, should not be published for reasons of confidentiality or financial stability.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. Description of the measure

**2.1 Institutions covered by the intended SyRB**

Please indicate whether the SyRB applies to:

☒ All institutions authorised in the Member State

☐ One or more subsets of credit institutions in the sector (please provide the names and identifiers (Legal Entity Identifier (LEI) code) of institutions covered)

| Name of institution | LEI code | Consolidation level |
|---|---|---|
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☒ A subsidiary whose parent is established in another Member State. (Please provide the names and identifiers (LEI code) of subsidiaries)

| Name of subsidiary | Name of the parent | LEI code of the subsidiary |
|---|---|---|
| **UniCredit Bank Austria AG** | UniCredit S.p.a. | D1HEB8VEU6D9M8ZUXG17 |
| **Santander Consumer Bank GmbH** | Banco Santander S.A. | 5299000I7Y60A8273788 |
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The listed subsidiaries whose parent is established in another member state must apply the sSyRB, if they have any exposure to the defined sector. However, being listed above does not necessarily imply that the subsidiary at the time of notification has any exposures to the defined sector.

If the SyRB applies to a subset of institutions, please describe the criteria for selection of the relevant institutions.

**2.2 Exposures covered by the SyRB**

**(Article 133(5) CRD)**

Please indicate the exposures to which the SyRB applies:

☐ (a) all exposures located in the Member State that is setting the buffer;

☐ (b) the following sectoral exposures located in the Member State that is setting the buffer:

- (i) ☐ all retail exposures to natural persons that are secured by residential property;
- (ii) ☐ all exposures to legal persons that are secured by mortgages on commercial immovable property;
- (iii) ☐ all exposures to legal persons excluding those specified in point (ii);
- (iv) ☐ all exposures to natural persons excluding those specified in point (i);

☒ (c) subsets of any of the sectoral exposures identified in point (b). Please specify the subsets in Section 2.3;

☐ (d) all exposures located in other Member States;

☐ (e) exposures located in third countries.

**2.3 Subsets of sectoral exposures**

Where the systemic risk buffer applies to subsets of any of the sectoral exposures identified (see point 2.2 (c)), please specify:

- The elements of the dimensions and subdimensions that were used to identify the subset(s) of sectoral exposures as laid down in the EBA Guidelines on the appropriate subsets of exposures in the application of SyRB:

| Dimensions/subdimensions | Elements |
|---|---|
| 1. Type of debtor or counterparty sector | Non-financial corporation with exception for limited-profit housing associations |
| *1.a Economic activity* | ÖNACE code F 41 “Construction of buildings”<br>ÖNACE code F 43 “Specialised construction activities”<br>ÖNACE code M 68 “Real estate activities” |
| 2. Type of exposure | All types of exposure |
| *2.a Risk profile* | No further differentiation |
| 3. Type of collateral | No further differentiation |
| *3.a Geographical area* | Austria (the geographical location of the relevant credit exposure is Austria) |

- Assessment conducted in accordance with Section 5 of the EBA Guidelines on the systemic relevance of the risks stemming from this subset, taking into account: (**introductory comment:** This analysis was performed on data as of June 2025 and used the same methodologies as for the previous analysis, which has been the basis for our notification for setting the sSyRB in May 2025, based on data as of June 2024. The reason for this unusually early re-assessment are the changes to the relevant risk weights due to the implementation of CRR 3. As the changes in RW due to CRR have been very limited in the aggregate, the results of this recent analysis are very much the same as for the previous one.)

(i) **Size:** Loan volume (including undrawn credit lines) to the specified sector (= CRE sector) and covered by the measure amounted to EUR 103 bn (all data as of September 2025). Loans to the specified sector account for 34% of total lending of Austrian credit institutions to non-financial corporations.

(ii) **Riskiness:**

- In Austria, increased systemic risks from financing the CRE-sector (as defined above) have been identified. The risks are so pronounced that they could disrupt the banking system with potentially significant adverse effects on the financial system and the real economy in Austria.
- Our analysis (performed by the Austrian National Bank) estimates potential losses in an (EBA) stress test environment from the specified sector as of EUR 13 bn.
- There is no systemic risk from loans to limited-profit housing associations due to a rigid legal framework that ensures among other criteria, that they engage in low-risk projects only and to hold conservative amounts of equity which resulted in zero defaults in the past. Therefore, these shall be excluded from the sSyRB.
- Risks are already materialising, with an NPL-ratio of 8,4% for the CRE-sector (Q3 2025), up from 1% YE 2022.

(iii) **Interconnectedness:** Risk indicators, model-based systemic risk analysis and international organizations identify an increased risk from loans to the CRE in Austria. A loss in trust in the Austrian banking system would lead to an increase in refinancing costs of banks and consequently to an increase of financing costs for the real economy. Feed-back effects due to the general recessive economic environment might lead to further losses from CRE loans. The systemic risks are so pronounced that they could disrupt the financial system with negative implications for the real economy. These risks are not limited to certain credit institutions but exist for all institutions that grant loans to the CRE sector.

- **Why it would not have been appropriate to set the systemic risk buffer at the level of a sector (as in point 2.2(b)) to cover the risk targeted?**

  Analysis of the systemic risks from real estate financing and recent NPL-developments show that the systemic risk stems from **exposures to non-financial corporations** in the real estate sector dealing with both **commercial** real estate and/or **residential** real estate. Linking the measure to the existence or type of collateral would not be sufficient, as a significant share of exposures identified is classified as specialised lending according to Article 147 (c)(ii) of the CRR 3 or income producing real estate as defined in Article 4 (75a) CRR 3.
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**2.4 Exposures located in other Member States and in third countries**

The buffer applies only to exposures located in Austria. Where the location is determined in accordance with delegated regulation (EU) Nr. 1152/2014.

**2.5 Buffer rate**

**(Article 133(9)(e) CRD)**

Specify the intended SyRB rate. If different buffer requirements apply to different exposures or subsets of exposures, please specify for each exposure indicated under 2.2.

Please indicate any changes to the list in 2.1 of institutions concerned and in the buffer rates given in point 2.5 as compared to the last notification, and provide an explanation, if applicable. **The change refers only to the buffer rate. No changes to the design of the buffer.**

| **Exposures** | **New SyRB rate** | | **Previous SyRB rate** | |
|---|---|---|---|---|
| | **All institutions** (SyRB rate) | **Set of institutions** (range of SyRB rates) | **All institutions** (SyRB rate) | **Set of institutions** (range of SyRB rates) |
| (a) All exposures located in the Member State that is setting the buffer | n.a. | n.a. | n.a. | n.a.a |
| (b) *The following sectoral exposures located in the Member State that is setting the buffer:* | | | | |
| (i) All retail exposures to natural persons that are secured by residential property | n.a. | n.a. | n.a. | n.a. |
| (ii) All exposures to legal persons that are secured by mortgages on commercial immovable property | n.a. | n.a. | n.a. | n.a. |
| (iii) All exposures to legal persons excluding those specified in point (ii) | n.a. | n.a. | n.a. | n.a. |
| (iv) All exposures to natural persons excluding those specified in point (i) | n.a. | n.a. | n.a. | n.a. |

| | | | | |
|---|---|---|---|---|
| (c) All exposures located in other Member States | n.a. | n.a. | n.a. | n.a. |
| (e) Exposures located in third countries | n.a. | n.a. | n.a. | n.a. |
| (f) *Subsets of any of the sectoral exposures identified in point (b):* | | | | |
| (i) **Exposure to CRE**<br>**ÖNACE code F 41 “Construction of buildings”**<br>**ÖNACE code F 43 “Specialised construction activities”**<br>**ÖNACE code M 68 “Real estate activities” except exposures to limited-profit housing associations** | **3.5%**<br>With phase in: 2% from 1 July 2026<br>3.5% from 1 July 2027 | n.a. | **1%** | n.a. |

If different buffer requirements apply to different subsets of institutions, please specify for each institution mentioned under 2.1.

| **Set of institutions** | | | | |
|---|---|---|---|---|
| **Exposures** | **Name of institution** | **LEI code** | **New SyRB rate** | **Previous SyRB rate** |
| n.a. | | | % | |
| n.a. | | | % | |
| n.a. | | | % | |

## 3. Timing for the measure

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| **3.1 Timing for the decision** | 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.<br>23 June 2026 |
| **3.2 Timing for publication** | What is the proposed date of publication of the notified measure?<br>29 June 2026 |
| **3.3 Disclosure** | The amended Capital Buffer Regulation will be published in the Federal Law Gazette and on the FMA website (including explanatory notes). |
| **3.4 Timing for application** | What is the intended date of application of the measure?<br>01/07/2026 |
| **3.5 Phasing in** | **A phase in period of one year is intended with a buffer rate of 2%**, from 01/07/2026 to 30/06/2027. From 01/07/2027 the buffer will be raised to 3.5%. |
| **3.6 Review/deactivation of the measure** | Review after 2 years (2028). |

## 4. Reasons for the notified SyRB

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| **4.1 Description of the macroprudential or systemic risk in your Member State**<br>**(Article 133(9)(a) of the CRD)** | **Where applicable, please classify the risks targeted by the notified SyRB under the following categories:**<br>**(i) risks stemming from the structural characteristics of the banking sector**<br>- **Size and concentration of banks n.a**<br>- **Ownership structure n.a. (**For this risks a SyRP is already in place for selected banks. This SyRP remains unchanged.)<br>- **Other structural risks** Loans to commercial real estate (CRE) companies, ie loans to companies in the identified sector, account for 13% of the total lending of Austrian credit institutions, and for 34% of lending to non-financial enterprises, which is a significant share. Loans to limited-profit housing associations pose a significantly reduced risk. Accordingly, limited-profit housing associations should be excluded from the macroprudential measure.<br>- The Austrian banking system currently comprises 417 banks. For 132 banks the share of CRE-loans in overall corporate loans is above 50%. Most of these banks lack resilience due to insufficient diversification.<br>**(ii) risks stemming from the propagation and amplification of shocks within the financial system**<br>- **Exposure concentration/asset commonality**: the main source of collateral for exposures in the CRE sector is CRE and RRE. Therefore, contagion effects in the Austrian real estate markets in case of high number of defaults increase banks' risk of losses due to price decreases.<br>- **Commonality in bank business models n.a.**<br>**Financial interconnections and contagion:** A high rate of credit defaults can lead to a loss in trust in the Austrian banking system which would lead to an increase in refinancing costs of banks and consequently to an increase in financing costs for the real economy. Feed-back effects due to the general recessive economic environment might lead to further losses from CRE-loans.<br>**(iii) risks to the banking system stemming from either the real economy or specific sectors**<br>- **Economic openness** n.a.<br>- **Sectoral risks from the private non-financial sector, households and the public sector**<br>The CRE-sector reveals – compared to other corporate loans - an increased default risk. The average PD of the current CRE-portfolio is 2.9% (up from 2.4% in Q2 2024) while the average PD of the other corporate loans is 1.5%. CRE-financing is characterised by high leverage, as 40% of the loans have an LTV above 80%. At the same time the share of CRE-exposures in all exposures of the banking sector is high compared to other industries and compared to other EU economies. The materialization of the risks can lead to significant negative effects on the real economy.<br>(iv) **Other risks** n.a.<br>**Please specify:**<br>- **Whether these risks are widespread across the whole financial sector?**<br>Systemic risks from CRE-financing are specific to the banking sector. Within the banking sector, about 1/3 of institutions has risk concentration in this sector. |

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| | - **Or whether they are concentrated only in one or more subsets of the sector?**<br>The systemic risks from CRE-financing are pronounced while no systemic risks have been identified for other sectors (industries). |
| **4.2 Reasons why the dimension of the macroprudential or systemic risks threatens the stability of the financial system in your Member State**<br>**(Article 133(9)(b) CRD)** | A materialization of the risks in the CRE-sector can lead to significant negative effects on the real economy. The systemic risks are not limited to individual credit institutions but exist for all institutions that grant CRE-loans due to the propagation effects described above (4.1).<br>According to the analysis by the Austrian National Bank comprising simulations of stress scenarios, the system-wide PDs and LGDs resulting from the simulations reach sizes like those that have been seen in the real estate crisis in US, Spain and Ireland in 2007/2008 and afterwards, that have led to a banking crisis in these countries.<br>A rate of credit defaults and losses in the Austrian banking system as high as those shown in the stress simulations, especially in combination with several bank failures (also an outcome of the simulated stress scenarios), would lead to a loss in trust in the Austrian banking system. This in turn would lead to an increase in refinancing costs of banks and subsequently to an increase in financing costs for the real economy, which would create a negative feedback-loop to the construction and real estate sectors, that are especially sensitive to interest rates. Feedback effects due to the general recessive economic environment and negative price developments for real estate might lead to further losses from CRE loans.<br>The details of the modelling/simulation approach are described in the FSR of the OeNB (Financial Stability Report 48 - Oesterreichische Nationalbank (OeNB)). The analysis and the simulation outcomes described there, however, have been relevant for the setting of the SyRB of 1% in 2025. The increase of the buffer rate to 3.5%, which is the subject of this notification, is based on a more recent stresstest scenario. However, the main conclusions remain unchanged. |
| **4.3 Indicators used for activation of the measure** | To measure systemic risks from CRE-financing, PDs and LGDs in an adverse economic environment (based on EBA stresstest scenario 2025 for Austria) have been estimated and the resulting NPL-ratios, losses and capital (CET 1) depletion were calculated. This has been done on the level of individual banks by using a simulation tool and on an aggregate level (for the banking system). Then the calculated losses at the aggregated level were compared to the available loss absorbing capacities (pillar I and pillar II capital and provisions) at the level of the banking system and at the level of individual banking groups.<br>The **decisive indicators** are i) losses from the identified sector in a stress scenario that are **not covered** by risk absorbing capacities (i.e. pillar I and pillar II capital and provisions) for exposures to the identified sector on an aggregated level, and ii) the number/size of banks with CET1 levels that would in the stress scenario fall below the two relevant regulatory thresholds, overall capital requirement (OCR) and overall capital demand (OCD). |
| **4.4 Effectiveness and proportionality of the measure**<br>**(Article 133(9)(c) CRD)** | The sSyRB aims to increase the risk-bearing capacity of the Austrian banking system and to reduce the risk to the Austrian banking system from disruptions in the real estate market. The current buffer rate of 1% is regarded as not sufficient to cover the identified risks. This has already been the essence of the |

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| | previous analysis that has led to setting the buffer rate of 1%, taking into account the uncertainty on the adjustments of RWAs for CRE-exposures due to CRR 3, which justified a cautious approach. The impact of CRR III on risk-weighted assets for CRE loans is minor. In the aggregate, risk-weighted assets have increased by only 0.3%.<br>According to the analysis of the Austrian National Bank, a buffer-rate of 3.5% of risk-weighted exposure amounts is appropriate to cover potential losses in the adverse economic scenario and to assure the desired resilience as described above, assuming that the increase in RWAs observed for CRE-exposures over the last years continues further. A phase-in period with initially 2% (planned to become effective as of 1 July 2026) and an increase to 3.5% after a year was assessed as effective and provides banks with the opportunity to build-up capital at low cost and adapt their business strategy, if necessary.<br>The benefits of strengthening resilience of the banking sector exceed the economic costs of the sSyRB. Due to the high profitability of most banks since 2023 the vast majority of banks has sufficient CET1 capital to fulfil the sSyRB in addition to all other regulatory capital requirements. The economic effects on the Austrian real economy are currently expected to be very small. In case of any short-term adjustments to the sSyRB by some banks with little free capital, one can expect substitution effects by higher capitalized banks.<br>There are no indications that the sSyRB is an obstacle to the smooth functioning of the European single market.<br>Due to the fact that the sSyRB only applies to exposures to the CRE-sector, the **effective buffer rate** for banks – measured as a percentage of the total risk exposure amount (TREA) pursuant to Art 92 (3) CRR - depends on the share of CRE-exposures in overall exposures, which is very heterogeneous across banks. So 50% of all banks face an effective buffer rate of 0.55% or below, while the (weighted) average value of the effective buffer rate is 0.41% only. For 75% of all banks the effective buffer rate is below 0.85%. The design of the buffer (that remains unchanged via the current situation) ensures that the additional buffer capital is built-up where the identified risks are most pronounced. |
| **4.5 Reason why the systemic risk buffer is not duplicating the functioning of the O-SII buffer provided for in Article 131 CRD**<br>**(Article 133(9)(f) CRD)** | The O-SII buffer addresses risks stemming from banks, which in the event of their failure present a significant risk for the stability of the financial system and therefore does not address other structural, systemic risks.<br>The already implemented SyRB addresses risks to the Austrian economy coming from disruptions in the banking system stemming from public ownership in banks, concentration of exposures in the CESEE-region and interconnectedness.<br>While the O-SII buffer and the SyRB address the long-term, structural risks of the financial sector as a whole, the sSyRB addresses elevated risks stemming from a specific sector only, but still with the capacity to disrupt the national financial system. Therefore, there is no overlap of the sSyRB with the existing OSII-buffer and the SyRB (the overlap of the latter two has already been considered in the design of the SyRB). |
| **5. Sufficiency, consistency and non-overlap of the policy response** | |
| **5.1 Sufficiency of the policy response** | The Austrian Financial Stability Committee has pointed out the pronounced risk on the Austrian banking system stemming from CRE-financing. The sSyRB aims to increase the risk-bearing capacity of the Austrian banking system as a whole and for each individual bank proportionate to its exposure to risks from CRE-financing. The vast majority of banks has already today sufficient CET1 capital |

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| | to fulfil the sSyRB in addition to all other regulatory capital requirements. So the measure is sufficient to raise the buffer capital to the desired level of resilience. The already existing SyRB for selected banks remain in place without any changes and is subject to re-evaluation later in 2026. |
| **5.2 Consistency of application of the policy response** | See 4.2 |
| **5.3 Non-overlap of the policy response** | There is no other policy instrument used to address the same systemic risk stemming from that specific economic sector.<br>- The calibration of the sSyRB is based on the results of the systemic risk analysis (see section 4.2) which provided potential losses in a stress scenario and considered regulatory capital requirements (Pillar I and Pillar 2 and macroprudential capital buffers) and loan loss provisions. The sSyRB addresses the remaining gap in compulsory loss absorbing capacities. Therefore, no overlap with pillar 1 and pillar 2 requirements exist.<br>- Regarding the non-overlap with the O-SIIB and SyRB see 4.5.<br>- Consequently, the methodology employed for calibration of the sSyRB prevents any overlap of requirements or double counting of risks. |
| **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**<br>**(Article 133(9)(d) of the CRD and Recommendation ESRB/2015/2[3])** | Potential cross-border impacts have been investigated. In line with the findings regarding the economic impact of the SyRB at the national level, no significant cross-border effects and no impact on the Internal Market are expected. |
| **6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State** | No leakages or potential fields of regulatory arbitrage were identified. |
| **6.3 Request for reciprocation by other Member States** | YES. Reciprocation is requested on the individual, subconsolidated and the consolidated level, in line with the levels of application in Austria. |

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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).

**(Article 134(5) CRD and Recommendation ESRB/2015/2)**

**6.4 Justification for the request for reciprocation by other Member States**

**(Article 134(5) CRD and Recommendation ESRB/2015/2)**

Analysis show a (compared to the size of the Austrian market) significant amount of cross-border exposures in the identified CRE-sector, especially with institutions in Germany. To ensure efficient functioning of the notified measure and to prevent circumvention of the measure, reciprocation is requested. For the reciprocal application of the sSyRB, a threshold of **EUR 100 million at bank level** is considered suitable taking into account the small size of the average Austrian bank. The threshold should be applicable at all relevant levels of consolidation.

Details about the threshold: The threshold is an exposure of EUR 100 million at the level of the institution, to companies located in Austria belonging to NACE sectors F41, F43, and M68 (ÖNACE 2025), as described in section 2.5, to be measured at all levels of consolidation: single institution level, sub-consolidated and consolidated level.

Where exposure means “outstanding nominal amount” as defined in chapter 4.4.9 **plus** “off-balance-sheet amount” as defined in chapter 4.4.10 of the AnaCredit Reporting Manual Part II – Datasets and data attributes, second edition (i.e. **before** application of conversion factors). See: AnaCredit Reporting Manual Part II – Datasets and data attributes, second edition

## 7. Combination of the SyRB with other buffers

**7.1 Combination with G-SII and/or O-SII buffers**

**(Article 131(15) CRD)**

Is the sum of the systemic risk buffer rate and the higher of the O-SII/G-SII buffer rates to which the same institution is subject above 5%?

**Yes.**

Please provide a list of the institutions subject to a G-SII or an O-SII buffer, indicating the G-SII or O-SII buffer and the sum of the G-SII/O-SII and SyRB buffers (a combined buffer rate of over 5% requires authorisation by the Commission).

Table 1: Institutions with a combined (sSyRB, SyRB, O-SIIB) rate **above 5%.**

| Name of institution | G-SII/O-SII buffer rate | O-SII consolidation level | Sum of G-SII/O-SII and SyRB rates | Sum of G-SII/O-SII, SyRB rates and sSyRB |
|---|---|---|---|---|
| **Erste Group Bank AG** | 1,75% | Consolidated | 2,75% | 6,25% |
| **Raiffeisen Bank International AG** | 1,75% | Consolidated | 2,75% | 6,25% |
| **UniCredit Bank Austria AG** | 1,75% | Consolidated | 2,25% | 5,75% |
| **Erste Group Bank AG** | 1,75% | Individual level | 2,25% | 5,75% |
| **Raiffeisen Bank International AG** | 1,75% | Individual level | 2,25% | 5,75% |
| **UniCredit Bank Austria AG** | 1,75% | Individual level | 2,25% | 5,75% |

The following list indicates the sum of O-SII and SyRB rates **without the sSyRB** rate. As the proposed sSyRB rate is 3.5%, the sum of all buffer rates

(O-SII buffer, SyRB, sSyRB) will be 6.25% as a maximum and therefore **above 5% for 3 institutions – see table above**. (There is no G-SII in Austria.)

Table 2: Consolidated level

| Name of institution | G-SII/O-SII buffer rate | O-SII consolidation level | Sum of G-SII/O-SII and SyRB rates |
|---|---|---|---|
| **Erste Group Bank AG** | 1,75% | Consolidated | 2,75% |
| **Raiffeisen Bank International AG** | 1,75% | Consolidated | 2,75% |
| **UniCredit Bank Austria AG** | 1,75% | Consolidated | 2,25% |
| **BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft** | 0,90% | Consolidated | 1,40% |
| **Raiffeisenlandesbank Oberösterreich Aktiengesellschaft** | 0,90% | Consolidated | 1,40% |
| **RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung** | 0,9 % | Consolidated | 1,40% |
| **VOLKSBANK WIEN AG** | 0,45% | Consolidated | 0,95% |
| **Addiko Bank AG** |  | Consolidated | 0,50% |
| **Hypo NOE Landesbank für Niederösterreich und Wien AG** |  | Consolidated | 0,50% |
| **Hypo Vorarlberg Bank AG** |  | Consolidated | 0,50% |
| **Hypo Tirol Bank AG** |  | Consolidated | 0,50% |
| **Oberösterreichische Landesbank Aktiengesellschaft** |  | Consolidated | 0,50% |

Individual Level

| Name of institution | G-SII/O-SII buffer rate | O-SII consolidation level | Sum of G-SII/O-SII and SyRB-rates |
|---|---|---|---|
| **Erste Group Bank AG** | 1,75% | Individual level | 2,25% |
| **Raiffeisen Bank International AG** | 1,75% | Individual level | 2,25% |
| **UniCredit Bank Austria AG** | 1,75% | Individual level | 2,25% |
| **BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft** | 0,90% | Individual level | 1,40% |
| **Raiffeisenlandesbank Oberösterreich Aktiengesellschaft** | 0,90% | Individual level | 1,40% |
| **RAIFFEISENLANDESBANK NIEDERÖSTERREICH-WIEN AG** | 0,90% | Individual level | 1,40% |
| **Erste Bank der oesterreichischen Sparkassen AG** | 0,90% | Individual level | 1,40% |
| **Steiermärkische Bank und Sparkassen AG 0,45%.** | 0,45% | Individual level | 0,45% |
| **Hypo Vorarlberg Bank AG** |  | Individual level | 0,50% |
| **Hypo Tirol Bank AG** |  | Individual level | 0,50% |
| **Oberösterreichische Landesbank Aktiengesellschaft** |  | Individual level | 0,50% |
| **Hypo NOE Landesbank für Niederösterreich und Wien AG** |  | Individual level | 0,50% |

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| **7.2 Combination with other systemic risk buffers**<br>**(Article 133(11) and (12) CRD)** | **Indicate all sets or subsets of exposures that would be subject to one or more systemic risk buffers with a combined systemic risk buffer rate in the ranges below:**<br>- **above 3% and up to 5%**<br>As the sSyRP is intended to be set at 3.5% (after phase-in), **all CRE-exposures** as defined in Section 2.2 of **all institutions** are subject to a Systemic Risk buffer between 3% and 5%. The maximum sum of sSyRB and SyRB is 4.5.<br>- **above 5%**<br>**none.** |
| **8. Miscellaneous** | |
| **8.1 Contact person(s)/mailbox at notifying authority** | Ursula Hauser-Rethaller (ursula.hauser-rethaller@fma.gv.at)<br>Nina Nenning (nina.nenning@fma.gv.at) |
| **8.2 Any other relevant information** | After the phase-in the overall SyRB-rate is 4.5% (3.5% sSyRB and 1% SyRB) and the combined rate of SyRB and O-SIIB is 6.25% (4.5% (s)SyRB and 1.75% O-SIIB) for some banks. Thus, the processes pursuant to Art 131 (15) and (5a) CRD and Art Art 133 (11) CRD apply.<br>**We therefore kindly ask the ESRB to forward this notification to the European Commission** and<br>i) ask for a legal act by the European Commission authorizing FMA to adopt the proposed measure pursuant to Art 131 (15) and (5a) CRD and to<br>ii) request the European Commission to provide an opinion pursuant to Art 133 (11) CRD.<br>**We further kindly request the ESRB to provide an opinion as stated in Art 133 (11) CRD.** |
| **8.3 Date of the notification** | Please provide the date on which this notification was uploaded/sent.<br>20 March 2026 |