



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

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1. Notifying national authority	
<b>1.1 Name of the notifying authority</b>	National Committee for Macroprudential Oversight (NCMO)
2. Description of the measure	
<b>2.1 Concerned institution or group of institutions</b>	<p>The NCMO assessed the Romanian banking system from the perspective of the systemic entities based on data related to December 2017, according to the best practices recommended by EBA. As of June 2018, a structural change in the Romanian banking system occurred, namely the takeover of Bancpost S.A. by Banca Transilvania S.A. In this context, the NCMO carried out a new assessment of the Romanian banking system from the point of view of the systemic entities, based on available data for June 2018, according to the best practices recommended by EBA.</p> <p>Based on data available as of 30 June 2018, 9 credit institutions Romanian legal entities obtained a score higher than the threshold set for automatic designation of systemically important institutions (275 basis points). The name and LEI code of the systemically important institutions identified in Romania are provided below.</p> <p>Banca Transilvania S.A. – LEI code 549300RG3H390KEL8896          UniCredit Bank S.A. – LEI code 5493003BDYD5VPGUQS04          Banca Comercială Română S.A. – LEI code 549300ORLU6LN5YD8X90          BRD - Groupe Societe Generale S.A. – LEI code 5493008QRHH0XCLJ4238          Raiffeisen Bank S.A. – LEI code 549300RFKNCOX56F8591          Alpha Bank România S.A. – LEI code 529900TKT32Z5LP7XF90          CEC Bank S.A. – LEI code 2138008AVF4W7FMW8W87          OTP Bank Romania S.A. – LEI code 5299003TM0P7W8DNUF61          Garanti Bank S.A. – LEI code 549300UZRCTIM0HREY46</p> <p>An O-SII buffer applicable in 2019 is set for the systemically important institutions which are Romanian legal entities. The O-SII buffer is applicable at the highest level of consolidation, as mentioned below.</p>
<b>2.2 Level of the buffer applied</b>	<p>The levels of the O-SII buffer applicable in 2018 for the systemically important institutions which are Romanian legal entities are the following:</p> <p>Banca Transilvania S.A. – 2% (consolidated level)          UniCredit Bank S.A. – 1% (sub-consolidated level)          Banca Comercială Română S.A. – 2% (sub-consolidated level)          BRD - Groupe Societe Generale S.A. – 1% (sub-consolidated level)          Raiffeisen Bank S.A. – 2% (sub-consolidated level)</p>

	<p>Alpha Bank România S.A. – 1% (individual level)  CEC Bank S.A. – 2% (individual level)  OTP Bank Romania S.A. – 1.5% (sub-consolidated level)  Garanti Bank S.A. – 1% (individual level)</p> <p>The above mentioned levels of the O-SII buffer are applicable beginning with 1<sup>st</sup> of January 2019.</p>
<b>2.3 Name of the EU ultimate parent institution</b>	<p>7 out of 9 systemically important institutions in Romania which are Romanian legal entities are subsidiaries of foreign banks, as follows:</p> <ul style="list-style-type: none"> <li>- Banca Comercială Română S.A. – subsidiary of Erste Group Bank AG (LEI code PQOH26KWDF7CG10L6792)</li> <li>- BRD - Groupe Societe Generale S.A. – subsidiary of Societe Generale (LEI code O2RNE8IBXP4R0TD8PU41)</li> <li>- UniCredit Bank S.A. – subsidiary of UniCredit S.p.A. (LEI code 549300TRUWO2CD2G5692)</li> <li>- Raiffeisen Bank S.A. – subsidiary of Raiffeisen Bank International AG (LEI code 9ZHRYM6F437SQJ6OUG95)</li> <li>- Alpha Bank România S.A. – subsidiary of Alpha Bank (LEI code 5299009N55YRQC69CN08)</li> <li>- OTP Bank Romania S.A. – subsidiary of OTP Bank Nyrt. (LEI code 529900W3MOO0A18X956)</li> <li>- Garanti Bank S.A. – subsidiary of Türkiye Garanti Bankası AS (LEI code 5493002XSS7K7RHN1V37) which is consolidated by Banco Bilbao Vizcaya Argentaria – BBVA (LEI code K8MS7FD7N5Z2WQ51AZ71)</li> </ul>
<b>2.4 Names of subsidiaries</b>	N/A
<b>3. Timing of the measure</b>	
<b>3.1 Timing of the Decision</b>	The National Committee for Macroprudential Oversight issued the Recommendation no.6/2018, according to which the National Bank of Romania is recommended to implement the O-SII buffer applicable in 2019 for the systemically important institutions identified based on data available as of June 2018.
<b>3.2 Timing of the Publication</b>	The intended date of publication of the notified measure is November 2018.
<b>3.3 Disclosure</b>	The National Committee for Macroprudential Oversight, as designated authority and the National Bank of Romania (NBR), as competent authority, will publish on the official website (i) the names of the identified systemically important institutions based on data available for June 2018, (ii) the scores obtained according to the methodology harmonized with the EBA Guidelines and (iii) the capital requirements consisting in the O-SII buffer applicable during 2019. In addition, the NBR will communicate the decision to each systemic bank which is subject to the O-SII buffer.
<b>3.4 Timing of Application</b>	The intended date of activation for the O-SII buffer is 1 <sup>st</sup> of January 2019.
<b>3.5 Phasing in</b>	The measure is not subject to phasing in.
<b>3.6 Review of the measure</b>	According to Article 131(6) and 131(12) of CRD IV (which was implemented in the national legal framework by the <i>NCMO Regulation No. 2 of 9 October 2017 on the methodology and procedures used for setting capital buffers and the scope of these instruments</i> ), the list of O-SIIs and the respective O-SII buffer will be reviewed annually. The present decision refers to O-SII buffers applicable during 2019. The next revision of the measure will be made in 2019 and will be applicable during 2020.
<b>4. Reason for O-SII identification and activation of the O-SII buffer</b>	

<p><b>4.1 Scores of concerned institution or group of institutions, as per EBA guidelines on the assessment of O-SIIs (Article 131.3)</b></p>	<p>The overall scores of the banks identified as systemically important institutions based on data available as of March 2017 are listed below:</p> <p>Banca Transilvania S.A. – 1621 basis points  UniCredit Bank S.A. – 1526 basis points  Banca Comercială Română S.A. – 1391 basis points  BRD - Groupe Societe Generale S.A. – 1164 basis points  Raiffeisen Bank S.A. – 1001 basis points  Alpha Bank România S.A. – 444 basis points  CEC Bank S.A. – 332 basis points  OTP Bank Romania S.A. – 306 basis points  Garanti Bank S.A. – 301 basis points</p> <p>The indicator values of the identified O-SIIs are provided in the attached Excel files (Annex no.1a – Mandatory indicators June 2018).</p> <p>The methodology used by the National Bank of Romania is harmonized with the EBA <i>Guidelines on the criteria to determine the conditions of application of Article 131(3) of Directive 2013/36/EU (CRD) in relation to the assessment of other systemically important institutions (O-SIIs)</i>, using a 275 basis points threshold. The above mentioned O-SIIs were designated using the mandatory criteria and indicators, i.e.:</p> <ol style="list-style-type: none"> <li>size;</li> <li>importance for the economy of the relevant Member State or the Union, capturing substitutability/financial institution infrastructure;</li> <li>complexity, including the additional complexities from cross-border activity;</li> <li>interconnectedness of the institution or (sub-)group with the financial system.</li> </ol> <p>In order to calculate the mandatory indicators, the harmonized definitions are used according the specifications in Table 2 of Annex 1 in the EBA <i>Guidelines on the criteria to determine the conditions of application of Article 131(3) of Directive 2013/36/EU (CRD) in relation to the assessment of other systemically important institutions (O-SIIs)</i> based on FINREP reports compiled according the implementing technical standard on an EU-wide common supervisory reporting framework.</p> <p>The highest level of consolidation was used for compilation of the mandatory indicators.</p>													
<p><b>4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)</b></p>	<p>The National Bank of Romania uses a two-step methodology: 1) calculation of scores based on mandatory indicators recommended by EBA <i>Guidelines on the criteria to determine the conditions of application of Article 131(3) of Directive 2013/36/EU (CRD) in relation to the assessment of other systemically important institutions (O-SIIs)</i>; 2) calculation of optional indicators (supervisory judgement).</p> <p>All the systemically important institutions listed in the Section 2.1. were identified using the mandatory indicators recommended by the EBA <i>Guidelines on the criteria to determine the conditions of application of Article 131(3) of Directive 2013/36/EU (CRD) in relation to the assessment of other systemically important institutions (O-SIIs)</i>.</p> <table border="1" data-bbox="523 1742 1426 2024"> <thead> <tr> <th>Criterion</th> <th>Indicators</th> <th>Weight</th> </tr> </thead> <tbody> <tr> <td><b>Size</b></td> <td>Total assets</td> <td>25.00%</td> </tr> <tr> <td rowspan="3"><b>Importance (including substitutability/financial system infrastructure)</b></td> <td>Value of domestic payment transactions</td> <td>8.33%</td> </tr> <tr> <td>Private sector deposits from depositors in the EU</td> <td>8.33%</td> </tr> <tr> <td>Private sector loans to recipients in the EU</td> <td>8.33%</td> </tr> </tbody> </table>	Criterion	Indicators	Weight	<b>Size</b>	Total assets	25.00%	<b>Importance (including substitutability/financial system infrastructure)</b>	Value of domestic payment transactions	8.33%	Private sector deposits from depositors in the EU	8.33%	Private sector loans to recipients in the EU	8.33%
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<b>Complexity/cross-border activity</b>	Value of OTC derivatives (notional)	8.33%
	Cross-jurisdictional liabilities	8.33%
	Cross-jurisdictional claims	8.33%
<b>Interconnectedness</b>	Intra-financial system liabilities	8.33%
	Intra-financial system assets	8.33%
	Debt securities outstanding	8.33%

For the evaluation performed in 2015 - 2018, the National Bank of Romania used the threshold of 275 basis points, based on discretions provided by the *EBA Guidelines on the criteria to determine the conditions of application of Article 131(3) of Directive 2013/36/EU (CRD) in relation to the assessment of other systemically important institutions (O-SIIs)*. The threshold of 275 basis points takes into account the specificities of the Romanian banking sector and the resulting statistical distribution of the scores, thereby ensuring the homogeneity of the group of designated O-SIIs.

The harmonized definitions are used in order to calculate the mandatory indicators, according the specifications in Table 2 of Annex 1 in the EBA Guidelines *i.e.* the FINREP reports compiled according the implementing technical standard on an EU-wide common supervisory reporting framework.

The evaluation performed by the NBR comprised all the credit institutions operating in Romania. The names and scores of institutions included in the evaluation process as of June 2018 are listed below:

Banca Transilvania S.A. – 1621 basis points  
UniCredit Bank S.A. – 1526 basis points  
Banca Comercială Română S.A. – 1391 basis points  
BRD - Groupe Societe Generale S.A. – 1164 basis points  
Raiffeisen Bank S.A. – 1001 basis points  
ING Bank – București Branch – 610 basis points  
Alpha Bank România S.A. – 444 basis points  
CEC Bank S.A. – 332 basis points  
OTP Bank Romania S.A. – 306 basis points  
Garanti Bank S.A. – 301 basis points  
Citibank Europe – România Branch – 234 basis points  
Banca Românească S.A. Grupul National Bank of Greece – 197 basis points  
Piraeus Bank S.A. – 131 basis points  
BANCA COMERCIALĂ INTESA SANPAOLO ROMANIA S.A. – 109 basis points  
Banca de Export-Import a României EXIMBANK S.A. – 104 basis points  
Credit Europe Bank S.A. – 102 basis points  
LIBRA INTERNET BANK S.A. – 65 basis points  
Credit Agricole Bank Romania S.A. – 48 basis points  
IDEA Bank S.A. - 47 basis points  
Patria Bank SA - 42 basis points  
MARFIN BANK (Romania) S.A. – 40 basis points  
ProCredit Bank S.A. – 35 basis points  
BANK LEUMI ROMANIA S.A. – 34 basis points  
BNP Paribas Paris – București Branch – 28 basis points  
PORSCHE BANK ROMANIA S.A. - 24 basis points  
BNP Paribas Personal Finance SA Paris – București Branch – 19 basis points  
Banca Centrală Cooperatistă Creditcoop – 16 basis points  
BLOM BANK FRANCE S.A. PARIS – ROMÂNIA Branch – 9 basis points  
Banca Comercială FERROVIARĂ S.A. - 8 basis points

	<p>TBI Bank EAD Sofia – București Branch – 7 basis points  BANCA ROMÂNĂ DE CREDITE SI INVESTIȚII S.A - 3 basis points  Alior Bank S.A. Varșovia – Bucharest Branch – 0 basis points</p> <p>No credit institution was excluded from the evaluation process. The evaluation comprised only credit institutions (the non-bank institutions were not included in the assessment).</p>
<p><b>4.3 Supervisory judgement</b></p>	<p>The methodology used by the National Bank of Romania comprises the following indicators in the second step of evaluation (supervisory judgement):</p> <ul style="list-style-type: none"> <li>a) The contribution of the credit institution to finance the real economy, calculated by the volume of loans to nonfinancial companies and the substitution degree of lending to nonfinancial companies;</li> <li>b) The contribution of the credit institution to financial intermediation, calculated by the volume of deposits from households and nonfinancial companies;</li> <li>c) The activity of the credit institution on the interbank market and quantifying the contagion effects;</li> <li>d) Assessment of systemically important institutions in the ReGIS payment system;</li> <li>e) Contagion vulnerability from the parent to subsidiary banks through the common lender channel (home country capital).</li> </ul> <p>The above mentioned criteria can be found in the list of indicators mentioned in Annex 2 - Optional indicators in the EBA <i>Guidelines on the criteria to determine the conditions of application of Article 131(3) of Directive 2013/36/EU (CRD) in relation to the assessment of other systemically important institutions (O- SII)s</i>, namely: private sector loans; retail deposits, corporate deposits; interbank claims and/or liabilities; payment services provided to market participants or others; potential contagion through entities in conglomerate/shareholders.</p> <p>The evaluation performed based on the optional indicators (supervisory judgement) did not identify systemically important institutions in addition to those already designated as systemic in the first step of calculating the mandatory indicators recommended by the EBA. Consistency of results is achieved by using a minimum threshold of 2.75% for the optional indicators, which is equivalent to 275 basis points threshold set for the first step of analysis (mandatory indicators). Therefore, the results obtained in the two steps of analysis are homogeneous.</p>
<p><b>4.4 Calibrating the O-SII buffer</b></p>	<p>The level of the O-SII buffer was set in accordance with the provisions of Article 131 (5) and (8) of CRD IV, stipulating that (i) the competent authority or designated authority may require each O-SII, on a consolidated, sub-consolidated or individual basis, as applicable, to maintain an O-SII buffer of up to 2 % of the total risk exposure amount calculated in accordance with Article 92(3) of Regulation (EU) No 575/2013, taking into account the criteria for the identification of the O-SII. That buffer shall consist of and shall be supplementary to Common Equity Tier 1 capital; (ii) where an O-SII is a subsidiary of either a G-SII or an O- SII which is an EU parent institution and subject to an O-SII buffer on a consolidated basis, the buffer that applies at individual or sub-consolidated level for the O-SII shall not exceed the higher of: (a) 1 % of the total risk exposure amount calculated in accordance with Article 92(3) of Regulation (EU) No 575/2013; and (b) the G-SII or O-SII buffer rate applicable to the group at consolidated level.</p> <p>Seven out of the 9 identified systemically important banks in Romania as of June 2018 are subsidiaries of foreign banks from other Member States (AT - BCR, Raiffeisen, IT - UniCredit, EL - Alpha Bank, FR - BRD, ES - Garanti Bank, HU – OTP Bank), which were identified as G-SIIs/O-SIIs and have to maintain an G-SII/O-SII buffer at consolidated level. Thus, according to the information published on the ESRB website, the G-SII/O-SII buffer applicable in 2019 is: O-SII buffer of 2% for Austrian banks; G-SII buffer of 1% and O-SII buffer of 0.5% for Italian bank</p>

	<p>UniCredit SpA; O-SII buffer of 0.25% for the Greek bank Alpha Bank; G-SII/O-SII buffer of 1% for the French bank; O-SII buffer of 0.75% in the case of BBVA; O-SII buffer of 1.5% in case of OTP Bank group in Hungary. In this respect, the level of the O-SII buffer applicable to the subsidiaries in Romania of the above mentioned banks takes into account the provisions of Article 131 (5) and (8) of CRD IV.</p> <p>Considering that the largest credit institutions in Romania are subsidiaries of foreign EU banks which have the status of G-SIIs/O-SIIs, the National Committee for Macroprudential Oversight recommended to the National Bank of Romania to implement an O-SII buffer for the Romanian legal entities identified as systemic starting January 1, 2019 which is correlated with the capital requirements applicable to parent banks.</p> <p>The above mentioned decision regarding the O-SII buffer also accounted for:</p> <ul style="list-style-type: none"> <li>(i) the role of the O-SII buffer in both increasing the capacity of systemically important institutions to absorb losses from potential exogenous shocks and reducing their negative impact on the banking system if the risks would materialize;</li> <li>(ii) the systemically important institutions hold voluntary buffers which may cover both the capital requirements applicable in 2019 and necessary amounts for developing the lending activity in a sustainable manner.</li> </ul>
<p><b>4.5 Effectiveness and proportionality of measure</b></p>	<p>The use of the O-SII buffer as a macroprudential instrument is effective in achieving the intermediate objective of "limiting the systemic impact of misaligned incentives with a view to reducing moral hazard", contributing to strengthening the resilience of large institutions which promotes the consolidation of the resilience of the financial system as a whole.</p> <p>The business decisions at an institution level have the objective to maximize profits, but negative externalities may occur for both the real economy and the banking sector as a whole. The objectives of imposing additional capital requirements for systemically important institutions consist of:</p> <ul style="list-style-type: none"> <li>(i) increasing their capacity to absorb losses, with positive effects on lowering the systemic risk generated by the size of institutions, i.e. the likelihood of facing financial difficulties or lower the severity of their potential negative impact. From this perspective, the O-SII buffer may prove effective;</li> <li>(ii) correcting the advantages that the entities considered "too big to fail" enjoy due to implicit government guarantees. Therefore, the O-SII buffer may be accounted as a proportional measure as it ensures an equal treatment for all banks in the domestic market.</li> </ul> <p>The macroprudential instrument consisting in higher capital requirements for the systemically important institutions (O-SII buffer) takes into account the structural dimension of systemic risk, i.e. the distribution of risk in the financial system. In the case of large institutions, the systemic risk arises from asset size and varies insignificantly over the economic cycle. The group of systemically important institutions in Romania (i) holds 78.5% of total assets of the Romanian banking sector as of June 2018, (ii) provides the bulk of financial services for the real economy: 77.4% of the stock of loans, 78.9% of the deposits from households and companies, 59.5% of payment transactions, (iii) considering the complexity criterion, they trade 95.6% of derivatives in OTC markets, hold 93.3% of total cross-jurisdictional claims and 85.8% of total cross-jurisdictional liabilities of the banking sector, and (iv) considering the interconnectedness criterion, they provide 71.8% of the intra-financial system assets and use 74.4% of intra-financial system liabilities, issuing 98.4% of total debt securities outstanding.</p>
<p><b>5. Cross-border and cross-sector impact of the measure</b></p>	

<p><b>5.1 Assessment of cross-border effects and the likely impact on the internal market</b> <b>(Recommendation ESRB/2015/2)</b></p>	<p>The higher capital requirements following the implementation of the O-SII buffer will increase the resilience of systemically important banks in Romania which will positively affect both (i) the stability of the financial system and the real economy at a domestic level and (ii) the soundness of the international banking groups at consolidated level.</p> <p>With respect to the impact on the internal market, it is to be mentioned that 92% of total exposures in the balance sheet of the Romanian banks as of June 2018 are of a domestic nature. The Romanian banking sector has a relatively modest importance on the foreign markets both in terms of assets and cross-border loans (direct cross-border loans and through branches sum up 6.3% of the total loans in the balance sheet of the Romanian banking sector, values as of March 2018). However, this figure becomes insignificant when compared to the EU banking sector (according the latest available figures – Consolidated Banking Data report - the share of the Romanian banking sector in the total assets of the EU banking sector was only 0.25% as of 31 December 2017). Under these circumstances, our assessment is that the above mentioned measure has little potential to generate significant cross-border effects via the risk adjustment spillover channel. With regards to the regulatory arbitrage channel, the structure of the banking groups indicates a marginal contribution of the foreign entities to the own funds of the groups or to their capital ratios.</p> <p>Also, it is to be mentioned that seven out of nine systemically important banks in Romania are subsidiaries of large EU foreign banks which are G-SIIs or O-SIIs in their home countries and therefore they are subject to G-SII/O-SII buffers. In this way, a level playing field both domestically and at EU level is ensured. In the case of subsidiaries of foreign banks, the level of O-SII was set considering the provisions of CRD IV and correlated with the capital requirements applicable to the mother banks.</p> <p>As the capitalization of large Romanian banks is adequate, the implementation of the O-SII buffer will not require new capital contributions from the shareholders. Even though the O-SII buffer is in place, the banks will still have enough capital reserves to be able to resume lending to the real economy in a sustainable manner.</p>
<p><b>5.2 Assessment of leakages and regulatory arbitrage within the notifying Member State</b></p>	<p>The scope for leakages and regulatory arbitrage is expected to be limited as:</p> <ul style="list-style-type: none"> <li>(i) the capital requirements consisting in the O-SII buffer should be maintained at the highest level of consolidation (i.e. at consolidated, sub-consolidated or individual level, as applicable) therefore preventing the shifts of activities within groups;</li> <li>(ii) the bulk of banking activity (around 92% of the total assets of the Romanian banking system) concentrate on domestic counterparties;</li> <li>(iii) the capitalization of large banks is adequate, hence the institutions are not bound to reduce or transfer their activities.</li> </ul>
<p><b>6. Combinations and interactions with other measures</b></p>	
<p><b>6.1 Combinations between G-SII and O-SII buffers (Article 131.14)</b></p>	<p>N/A</p> <p>The Romanian banking system comprises no G-SII.</p>
<p><b>6.2 Combinations with SRB buffers (Article 131.14 + Article 133.5)</b></p>	<p>Currently, a Systemic Risk Buffer (SRB) applicable to all credit institutions Romanian legal persons is in place.</p> <p>The implementation of SRB in Romania intends to address the vulnerabilities identified across the national financial system:</p> <ul style="list-style-type: none"> <li>(i) the possibility of a renewed increase in non-performing loan ratios, following the rise in interest rates and the slowdown in the balance sheet clean-up process;</li> <li>(ii) the tensions surrounding macroeconomic equilibria</li> </ul>

	<p>The rationale behind implementing the systemic risk buffer is circumscribed to the following two perspectives: (i) ensuring an adequate management of credit risk from a macroprudential perspective, amid the possible return of non-performing loans onto an upward path, in the context of unfavourable circumstances related to credit institutions' potential future efforts to clean up their balance sheets and (ii) preserving financial stability, assuming that the tensions surrounding domestic macroeconomic equilibria and regional and global uncertainties will persist.</p> <p>Recent European initiatives concerning NPL resolution highlight the importance of tackling this issue from a macroprudential perspective, due to the significant negative effects on banking sector activity and, therefore, on the real economy. Moreover, the tightening on macroeconomic equilibria can lead to significant negative second-round effects on the financial sector, in case of unanticipated external or internal shocks.</p> <p>The level of the systemic risk buffer is set at 0 percent, 1 percent or 2 percent, according to the 12 months average of the non-performing loans ratio and the coverage ratio with provisions reported by each individual credit institution, in accordance with the methodology established in the implementation process of the SRB:</p> <table border="1" data-bbox="512 927 1428 1167"> <thead> <tr> <th>Non-performing loans ratio</th> <th>Coverage ration with provisions</th> <th>Buffer rate (% of CET1 capital applied to total RWA)</th> </tr> </thead> <tbody> <tr> <td>&lt; 5%</td> <td>&gt; 55%</td> <td>0%</td> </tr> <tr> <td>&gt; 5%</td> <td>&gt; 55%</td> <td>1%</td> </tr> <tr> <td>&lt; 5%</td> <td>&lt; 55%</td> <td>1%</td> </tr> <tr> <td>&gt; 5%</td> <td>&lt; 55%</td> <td>2%</td> </tr> </tbody> </table> <p>This approach was implemented in order to support the credit risk management process and to increase the resilience of the banking sector against unanticipated shocks, amid structural unfavourable circumstances.</p> <p>The SRB is applicable to all exposures. Therefore, according the CRD IV provisions, the higher of O-SII buffer and SRB will apply to systemically important banks. Both O-SII buffer and SRB apply to highest level of consolidation.</p>	Non-performing loans ratio	Coverage ration with provisions	Buffer rate (% of CET1 capital applied to total RWA)	< 5%	> 55%	0%	> 5%	> 55%	1%	< 5%	< 55%	1%	> 5%	< 55%	2%
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< 5%	> 55%	0%														
> 5%	> 55%	1%														
< 5%	< 55%	1%														
> 5%	< 55%	2%														
<p><b>6.3 O-SII requirement for a subsidiary (Article 131.8)</b></p>	<p>7 out of 9 systemically important institutions in Romania which are Romanian legal entities are subsidiaries of foreign banks, as follows:</p> <ul style="list-style-type: none"> <li>- Banca Comercială Română S.A. – subsidiary of Erste Group Bank AG</li> <li>- BRD - Groupe Societe Generale S.A. – subsidiary of Societe</li> <li>- UniCredit Bank S.A. – subsidiary of UniCredit S.p.A.</li> <li>- Raiffeisen Bank S.A. – subsidiary of Raiffeisen Bank International AG</li> <li>- Alpha Bank România S.A. – subsidiary of Alpha Bank</li> <li>- OTP Bank Romania S.A. – subsidiary of OTP Bank Nyrt.</li> <li>- Garanti Bank S.A. – subsidiary of Turkiye Garanti Bankasi AS which is consolidated by Banco Bilbao Vizcaya Argentaria – BBVA</li> </ul> <p>Banca Comercială Română S.A., BRD - Groupe Societe Generale S.A., UniCredit Bank S.A., Raiffeisen Bank S.A., Alpha Bank România S.A., OTP Bank Romania S.A. and Garanti Bank S.A. are subsidiaries of foreign banks which were identified as systemically important in the home countries or as G-SIIs. Therefore, the level of the O-SII buffer applicable in 2019 for the above mentioned subsidiaries in Romania was set in accordance with the capital requirements consisting in G-SII/O-SII buffer applicable to mother banks, observing the provisions of Article 131 (8) of CRD IV, stipulating that where an O-SII is a subsidiary of either a G-SII or an O-SII which is an EU parent institution and subject to an O-SII buffer on a consolidated basis, the</p>															



	<p>buffer that applies at individual or sub-consolidated level for the O-SII shall not exceed the higher of: (a) 1 % of the total risk exposure amount calculated in accordance with Article 92(3) of Regulation (EU) No 575/2013; and (b) the G-SII or O-SII buffer rate applicable to the group at consolidated level.</p> <p>With respect to other two Romanian banks identified as O-SIIs, is to be mentioned that:</p> <ul style="list-style-type: none"> <li>(i) Banca Transilvania S.A. is not a subsidiary of a foreign EU parent institution, therefore the National Bank of Romania is the competent authority;</li> <li>(ii) CEC Bank S.A. has domestic capital and the National Bank of Romania is the competent authority.</li> </ul> <p>Thus, both the provisions of Article 131 (5) and (8) of CRD IV are observed in the case of the O-SII buffer applied to the systemically important institutions in Romania.</p>
<b>6.4 Interaction with other measures</b>	N/A

<b>7. Miscellaneous</b>	
<b>7.1 Contact person(s) at notifying authority</b>	<p>Eugen Rădulescu, National Committee for Macroprudential Oversight Secretariat, director of the Financial Stability Department in the National Bank of Romania</p> <p>Phone: +4021 3130653</p> <p>E-mail: <a href="mailto:eugen.radulescu@bnro.ro">eugen.radulescu@bnro.ro</a></p>
<b>7.2 Any other relevant information</b>	N/A