



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

Please send this template to

- [notifications@esrb.europa.eu](mailto:notifications@esrb.europa.eu) when notifying the ESRB;
- [macropru.notifications@ecb.europa.eu](mailto:macropru.notifications@ecb.europa.eu) when notifying the ECB;
- [notifications@eba.europa.eu](mailto:notifications@eba.europa.eu) when notifying the EBA.

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

1. Notifying national authority																							
1.1 Name of the notifying authority	Czech National Bank																						
2. Description of the measure																							
2.1 Concerned institution or group of institutions	<p>The Czech Republic has designated as O-SIIs the following institutions on the basis of their highest consolidated levels:</p> <table border="1"> <thead> <tr> <th><i>O-SII institution</i></th> <th><i>LEI code</i></th> </tr> </thead> <tbody> <tr> <td>Československá obchodní banka, a.s.</td> <td>Q5BP2UEQ48R75BOTCB92</td> </tr> <tr> <td>Komerční banka, a.s.</td> <td>IYKCAVNFR8QGF00HV840</td> </tr> <tr> <td>Česká spořitelna, a.s.</td> <td>9KOGW2C2FCIOJQ7FF485</td> </tr> <tr> <td>UniCredit Bank CZ and SK, a.s.</td> <td>KR6LSKV3BTSJRD411F75</td> </tr> <tr> <td>PPF Financial Holdings B.V. (relevant entity of the PPF banka regulated consolidated group)</td> <td>31570010000000036567</td> </tr> <tr> <td>Raiffeisenbank, a.s.</td> <td>31570010000000004460</td> </tr> </tbody> </table>		<i>O-SII institution</i>	<i>LEI code</i>	Československá obchodní banka, a.s.	Q5BP2UEQ48R75BOTCB92	Komerční banka, a.s.	IYKCAVNFR8QGF00HV840	Česká spořitelna, a.s.	9KOGW2C2FCIOJQ7FF485	UniCredit Bank CZ and SK, a.s.	KR6LSKV3BTSJRD411F75	PPF Financial Holdings B.V. (relevant entity of the PPF banka regulated consolidated group)	31570010000000036567	Raiffeisenbank, a.s.	31570010000000004460							
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2.2 Level of the buffer applied	<p>The O-SII buffer is not applied in the Czech Republic. However, an institution-specific systemic risk buffer applies (section 6.2).</p> <p>After the transposition of the CRD V, the CNB will use the capital buffer for other systemically important institutions in accordance with the new legislation.</p>																						
2.3 Name of the EU ultimate parent institution	<table border="1"> <thead> <tr> <th><i>O-SII institution</i></th> <th><i>Ultimate parent</i></th> <th><i>LEI code</i></th> </tr> </thead> <tbody> <tr> <td>Československá obchodní banka, a.s.</td> <td>KBC Group NV</td> <td>213800X3Q9LSAKRUWY91</td> </tr> <tr> <td>Komerční banka, a.s.</td> <td>Société Générale SA</td> <td>O2RNE8IBXP4R0TD8PU41</td> </tr> <tr> <td>Česká spořitelna, a.s.</td> <td>Erste Group Bank AG</td> <td>PQOH26KWDF7CG10L6792</td> </tr> <tr> <td>UniCredit Bank CZ and SK, a.s.</td> <td>UniCredit S.p.A.</td> <td>549300TRUWO2CD2G5692</td> </tr> <tr> <td>PPF Financial Holdings B.V. (relevant entity of the PPF banka regulated consolidated group)</td> <td>PPF Group N.V.</td> <td>315700300000000000550</td> </tr> <tr> <td>Raiffeisenbank, a.s.</td> <td>Raiffeisen Bank International AG</td> <td>9ZHRYM6F437SQJ6OUG95</td> </tr> </tbody> </table>		<i>O-SII institution</i>	<i>Ultimate parent</i>	<i>LEI code</i>	Československá obchodní banka, a.s.	KBC Group NV	213800X3Q9LSAKRUWY91	Komerční banka, a.s.	Société Générale SA	O2RNE8IBXP4R0TD8PU41	Česká spořitelna, a.s.	Erste Group Bank AG	PQOH26KWDF7CG10L6792	UniCredit Bank CZ and SK, a.s.	UniCredit S.p.A.	549300TRUWO2CD2G5692	PPF Financial Holdings B.V. (relevant entity of the PPF banka regulated consolidated group)	PPF Group N.V.	315700300000000000550	Raiffeisenbank, a.s.	Raiffeisen Bank International AG	9ZHRYM6F437SQJ6OUG95
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2.4 Names of subsidiaries	Not applicable as a buffer has not been set.														
<b>3. Timing of the measure</b>															
3.1 Timing of the Decision	26 November 2020														
3.2 Timing of the Publication	30 November 2020														
3.3 Disclosure	The designation of O-SIIs is disclosed at the website of the Czech National Bank ( <a href="#">Link</a> ). The O-SII buffer is not applied in the Czech Republic.														
3.4 Timing of Application	1 January 2021														
3.5 Phasing in	The O-SII buffer is not applied in the Czech Republic. The designation of the O-SII will apply immediately from 1 January 2021.														
3.6 Review of the measure	The identification of O-SIIs will be reviewed by 1 December 2021.														
<b>4. Reason for O-SII identification and activation of the O-SII buffer</b>															
4.1 Scores of concerned institution or group of institutions, as per EBA guidelines on the assessment of O-SIIs (Article 131.3)	<table border="1"> <thead> <tr> <th><i>O-SII institution</i></th> <th><i>Overall score (in basis points)</i></th> </tr> </thead> <tbody> <tr> <td>Československá obchodní banka, a.s.</td> <td>2271</td> </tr> <tr> <td>Česká spořitelna, a.s.</td> <td>1535</td> </tr> <tr> <td>Komerční banka, a.s.</td> <td>1400</td> </tr> <tr> <td>UniCredit Bank CZ and SK, a.s.</td> <td>1040</td> </tr> <tr> <td>PPF Financial Holdings B.V. (relevant entity of the PPF banka regulated consolidated group)</td> <td>827</td> </tr> <tr> <td>Raiffeisenbank, a.s.</td> <td>472</td> </tr> </tbody> </table>	<i>O-SII institution</i>	<i>Overall score (in basis points)</i>	Československá obchodní banka, a.s.	2271	Česká spořitelna, a.s.	1535	Komerční banka, a.s.	1400	UniCredit Bank CZ and SK, a.s.	1040	PPF Financial Holdings B.V. (relevant entity of the PPF banka regulated consolidated group)	827	Raiffeisenbank, a.s.	472
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For further details, a separate excel file has been sent with notification.															
4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)	<p>Please provide information on:</p> <p>a. whether you followed the EBA guidelines on the assessment of O-SIIs The CNB fully follows the EBA guidelines on the assessment of O-SIIs.</p> <p>b. which threshold score has been set to identify O-SIIs In accordance with the paragraph 9 of the Guidelines, the CNB raises the threshold for designating entities as O-SIIs to the highest level allowed by the Guidelines (425 basis points, i.e. 4.25%).</p> <p>c. which overall score is attributed to the O-SIIs For the O-SII overall score, see section 4.1 above.</p> <p>d. which of the optional indicators have been used to justify supervisory assessment decisions, if any, and what are the scores. Share in private sector deposits and private sector loans in domestic banking sector, base threshold level stipulated by Guidelines, a status of a former O-SII.</p> <p>e. why these optional indicators are relevant for the Member State A significant share in the private sector deposits and the private sector loans in the domestic banking sector are considered as critical functions of the bank. We take into account a status of a former O-SII due to consistency of the O-SII group</p>														

	<p>f. why the bank is systemically important in terms of those particular optional indicators An optional indicator is not used to identify additional O-SIIs. If the institution's score nears the 4.25% threshold, the CNB assesses the volume of retail deposits, private sector loans (critical functions) and a status of a former O-SII (consistency).</p> <p>g. whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process In accordance with the paragraph 12 of the Guidelines, the CNB exempts investment firms from the calculation as they do not play a material role in the Czech financial system.</p> <p>h. names and scores of all relevant entities not excluded from the identification process (could be sent in a separate excel file, see 4.1) A separate excel file has been sent with the notification.</p> <p>i. whether non-bank institutions have been included in the calculations No</p>
<b>4.3 Supervisory judgement</b>	No.
<b>4.4 Calibrating the O-SII buffer</b>	The O-SII buffer is not applied in the Czech Republic. After the transposition of the CRD V, the CNB will use the capital buffer for other systemically important institutions.
<b>4.5 Effectiveness and proportionality of measure</b>	The O-SII buffer is not applied in the Czech Republic.
<b>5. Cross-border and cross-sector impact of the measure</b>	
<b>5.1 Assessment of cross-border effects and the likely impact on the internal market (Recommendation ESRB/2015/2)</b>	As no O-SII buffer has been set, we do not anticipate any cross-border effects.
<b>5.2 Assessment of leakages and regulatory arbitrage within the notifying Member State</b>	As no O-SII buffer has been set, we do not anticipate any leakages and regulatory arbitrage within the Czech financial sector.
<b>6. Combinations and interactions with other measures</b>	
<b>6.1 Combinations between G-SII and O-SII buffers (Article 131.14)</b>	There are no G-SIIs in the Czech Republic and the O-SII buffer is not applied.

<p><b>6.2 Combinations with SRB buffers</b> <b>(Article 131.14 + Article 133.5)</b></p>	<p>Are any of the institutions subject to a systemic risk buffer?</p> <p>If yes, please provide the following information:</p> <p>a. What is the level of the systemic risk buffer (in %) applied to the concerned institution</p> <table border="1" data-bbox="560 360 1430 524"> <thead> <tr> <th><i>O-SII institution</i></th> <th><i>The systemic risk buffer (%)</i></th> </tr> </thead> <tbody> <tr> <td>Československá obchodní banka, a.s.</td> <td>3.0</td> </tr> <tr> <td>Česká spořitelna, a.s.</td> <td>3.0</td> </tr> <tr> <td>Komerční banka, a.s.</td> <td>3.0</td> </tr> <tr> <td>UniCredit Bank CZ and SK, a.s.</td> <td>2.0</td> </tr> <tr> <td>Raiffeisenbank, a.s.</td> <td>1.0</td> </tr> </tbody> </table> <p>For more information, see the website of the Czech National Bank (<a href="#">Link</a>).</p> <p>b. Is the systemic risk buffer applied to all exposures located in your Member State only? No, the systemic risk buffer applies to all exposures.</p> <p>c. Is the systemic risk buffer applied at the same consolidation level as the O-SII buffer? The O-SII buffer is not applied in the Czech Republic.</p>	<i>O-SII institution</i>	<i>The systemic risk buffer (%)</i>	Československá obchodní banka, a.s.	3.0	Česká spořitelna, a.s.	3.0	Komerční banka, a.s.	3.0	UniCredit Bank CZ and SK, a.s.	2.0	Raiffeisenbank, a.s.	1.0												
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<p><b>6.3 O-SII requirement for a subsidiary (Article 131.8)</b></p>	<p>In case the O-SII is a subsidiary of an EU parent institution which is subject to a G-SII or O-SII buffer on a consolidated basis, what is the G-SII or O-SII buffer rate on a consolidated basis of the parent institution?</p> <table border="1" data-bbox="560 949 1430 1261"> <thead> <tr> <th><i>O-SII institution</i></th> <th><i>Ultimate parent</i></th> <th><i>G-SII buffer</i></th> <th><i>Final O-SII buffer</i></th> </tr> </thead> <tbody> <tr> <td>Československá obchodní banka, a.s.</td> <td>KBC Group NV</td> <td>-</td> <td>1.5 %</td> </tr> <tr> <td>Komerční banka, a.s.</td> <td>Société Générale SA</td> <td>1 %</td> <td></td> </tr> <tr> <td>Česká spořitelna, a.s.</td> <td>Erste Group Bank AG</td> <td>-</td> <td>2%</td> </tr> <tr> <td>UniCredit Bank CZ and SK, a.s.</td> <td>UniCredit S.p.A.</td> <td>1 %</td> <td></td> </tr> <tr> <td>Raiffeisenbank, a.s.</td> <td>Raiffeisen Bank International AG</td> <td>-</td> <td>2%</td> </tr> </tbody> </table>	<i>O-SII institution</i>	<i>Ultimate parent</i>	<i>G-SII buffer</i>	<i>Final O-SII buffer</i>	Československá obchodní banka, a.s.	KBC Group NV	-	1.5 %	Komerční banka, a.s.	Société Générale SA	1 %		Česká spořitelna, a.s.	Erste Group Bank AG	-	2%	UniCredit Bank CZ and SK, a.s.	UniCredit S.p.A.	1 %		Raiffeisenbank, a.s.	Raiffeisen Bank International AG	-	2%
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<p><b>6.4 Interaction with other measures</b></p>	<p>Not applicable as a buffer has not been set.</p>																								

<p><b>7. Miscellaneous</b></p>	
<p><b>7.1 Contact person(s) at notifying authority</b></p>	<p>Libor Holub, +420 224 412 502, <a href="mailto:libor.holub@cnb.cz">libor.holub@cnb.cz</a> Lukáš Pfeifer, +420 224 412 638, <a href="mailto:lukas.pfeifer@cnb.cz">lukas.pfeifer@cnb.cz</a></p>
<p><b>7.2 Any other relevant information</b></p>	