

## Template for notifying the intended use of a systemic risk buffer (SRB)

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1. Notifying national authority and scope of the notification					
<b>1.1 Name of the notifying authority</b>	Czech National Bank (CNB)				
<b>1.2 Type of measure intended (also for reviews of existing measures)</b>	Maintaining existing systemic risk buffer (SRB) rates				
2. Description of the notified measure					
<b>2.1 Institutions covered by the intended SRB</b>	SRB is applied to the following institutions:				
	Bank	Ultimate parent	LEI code		
	Československá obchodní banka, a.s.	KBC Group NV	Q5BP2UEQ48R75BOTCB92		
	Česká spořitelna, a.s.	Erste Group Bank AG	9KOGW2C2FCIOJQ7FF485		
	Komerční banka, a.s.	Société Générale SA	IYKCAVNFR8QGF00HV840		
	UniCredit Bank CZ and SK, a.s.	UniCredit S.p.A.	KR6LSKV3BTSJRD41IF75		
Raiffeisenbank, a.s.	Raiffeisen-Landesbanken-Holding GmbH	31570010000000000000			
<b>2.2 Buffer rate (Article 133(11)(f) of the CRD)</b>	Bank	Buffer level			
		1 November 2014	1 January 2017	1 January 2019	1 January 2021
	Československá obchodní banka, a.s.	3.0%	3.0%	3.0%	3.0%
	Česká spořitelna, a.s.	3.0%	3.0%	3.0%	3.0%
	Komerční banka, a.s.	2.5%	3.0%	3.0%	3.0%
	UniCredit Bank CZ and SK, a.s.	1.0%	2.0%	2.0%	2.0%
Raiffeisenbank, a.s.	0.0%	1.0%	1.0%	1.0%	
<b>2.3 Exposures covered by the SRB</b>	The SRB applies to all exposures.				
3. Timing of the measure					

<b>3.1 Timing of the Decision</b>	18 June 2020
<b>3.2 Timing of the Publication</b>	27 August 2020
<b>3.3 Disclosure</b>	Relevant banks were informed about the outcome of the review by an indicative letter in July 2020. The decision taken by the CNB was disclosed in an appropriate manner by the press release and on the CNB website.
<b>3.4 Timing of Application</b>	1 January 2021
<b>3.5 Phasing in</b>	Without phasing
<b>3.6 Review/deactivation of the measure</b>	The expected deactivation of the measure is mid-2021. After the transposition of CRD V, CNB will use the capital buffer for other systemically important institutions for these purposes.
<b>4. Reasons for the intended SRB</b>	
<b>4.1 Description of the long-term non-cyclical systemic risk in your Member State</b> <b>(Article 133(11)a of the CRD)</b>	Reasons for the intended SRB have not changed, the notification merely confirms the extension of the existing measure. The CNB uses the SRB to mitigate systemic risk arising from the potential destabilisation of relevant banks, that is, those domestic banks which contribute most to the non-cyclical systemic risk within the Czech economy, as indicated by the levels of their SI scores. However, after the transposition of the CRD V, the CNB will use the capital buffer for other systemically important institutions (the O-SII buffer) for these purposes in accordance with the new legislation.
<b>4.2 Reasons why the dimension of the long-term non-cyclical systemic risk threatens the stability of the financial system in your Member State</b> <b>(Article 133(11)(b) of the CRD)</b>	Destabilisation (in the sense of capital falling close to or below the regulatory minimum in any one or more of these banks) might damage confidence in the capacity of the banking sector to provide all their services in an efficient manner and have serious adverse implications for the financial system and the whole Czech economy. The banking sector plays the key role in the Czech financial system and the whole economy (banking sector assets correspond to about 155% of the country's GDP). The Czech banking sector is characterised by relatively high degree of concentration (the relevant banks represent about 68% of the whole banking sector). Further source of vulnerabilities stems from common significant exposures to identical sectors: residential/commercial real estate and non-financial corporate sector. Since the Czech economy is highly open and production is export-oriented, both sectors are strongly sensitive to the swings in external conditions.
<b>4.3 Indicators used for the activation of the measure</b>	The SRB is imposed on a bank if the bank's SI score exceeds a certain threshold. The SI score for a bank is calculated using four categories of indicators: size, interconnectedness, substitutability, complexity. The buffer level for a given bank is determined primarily on the basis of the bank's SI score. Details of the analytical basis for the calculation of SI scores are described in CNB's Financial Stability Report 2012/2013 - see: <a href="https://www.cnb.cz/en/financial-stability/thematic-articles-on-financial-stability/An-Additional-capital-requirements-based-on-the-domestic-systemic-importance-of-a-bank/">https://www.cnb.cz/en/financial-stability/thematic-articles-on-financial-stability/An-Additional-capital-requirements-based-on-the-domestic-systemic-importance-of-a-bank/</a>
<b>4.4 Effectiveness and proportionality of the measure</b> <b>(Article 133(11)(c) of the CRD)</b>	Effectiveness and proportionality of the measure will be ensured by virtue of the fact that both the choice of banks to maintain the buffer and the level of the buffer are determined on the basis of the systemic importance (SI score) of the bank. The buffer mitigating the risks associated with systemically important institutions should be used as the last-resort capital buffer so that the functioning of the banking sector is not disrupted in very adverse economic situations.

<p><b>4.5 Justification of inadequacy of existing measures in the CRD or in the CRR, excluding Articles 458 and 459 of the CRR, to address the identified risks</b></p> <p><b>(Article 133(11)(e) of the CRD)</b></p>	<p>The intended measure is expected to ensure high resilience of banks with the most systemic impact and thus the financial sector as a whole. While in principle the other systemically important institutions (O-SII) buffer might be used for such purpose as well, the use of the O-SII buffer cannot serve the purpose as to the horizon of application and the size of add-on. The CNB has long pointed out that the use of the SRB as an alternative to the O-SII buffer is due to legislative restrictions on the latter. As the parent institutions of all systemically important domestic banks are either O-SIIs or G-SIIs, the subsidiary cap represents a significant constraint on the conduct of macroprudential policy in the Czech Republic.</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></p> <p><b>(Article 133(11)(d) of the CRD and Recommendation ESRB/2015/2)</b></p>	<p>The buffer levels apply to the total amount of risk exposure regardless of geographical aspects. As for the cross-border impact, the relevant banks are subsidiaries of foreign banks. They are focusing primarily on local clientele. The impact of the measure on other MSs and the whole EU will likely be immaterial. The measure is therefore expected not to hinder the operation of the EU's internal market.</p>
<p><b>5.2 Assessment of leakages and regulatory arbitrage within the notifying Member State</b></p>	<p>Not relevant.</p>
<p><b>5.3 Reciprocation by other Member States</b></p> <p><b>(Article 134(4) of the CRD and Recommendation ESRB/2015/2)</b></p>	<p>The CNB does not request the ESRB to issue a recommendation to other Member States to reciprocate the measures by Article 134(4) of the CRD.</p>
<p><b>6. Combination of the SRB with other buffers</b></p>	
<p><b>6.1 Combination with G-SII and/or O-SII buffers (Article 133(4) and (5) of the CRD)</b></p>	<p>None of the relevant banks is subject to the O-SII buffer and G-SII buffer.</p>
<p><b>6.2 Other relevant information</b></p>	<p>N/A</p>
<p><b>7. Miscellaneous</b></p>	

<b>7.1 Contact person(s) at notifying authority</b>	Jan Frait, +420 224 414 430, jan.frait@cnb.cz Libor Holub, +420 224 412 502, libor.holub@cnb.cz
<b>7.2 Any other relevant information</b>	N/A