

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

Please send this template to

- notifications@esrb.europa.eu when notifying the ESRB;
- macropru.notifications@ecb.europa.eu when notifying the ECB;
- 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	Austrian Financial Market Authority																																																
2. Description of the measure																																																	
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2.2 Level of the buffer applied																																																	

List of identified institutions (consolidated)

29.12.2020

Erste Group Bank AG	2.00%
Raiffeisen Bank International AG	2.00%
UniCredit Bank Austria AG	2.00%*
BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	1.00%
Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	1.00%
RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung	1.00%
Volksbank Wien AG (pursuant to Art. 30a Banking Act for Volksbanken Verbund)	1.00%
<i>*prior to taking Article 23c para. 8 BWG into account</i>	

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2.4 Names of subsidiaries	N/A												
3. Timing of the measure													
3.1 Timing of the Decision	18.12.2020												
3.2 Timing of the Publication	As there is no change in O-SII buffers the already existing publication stays in place unchanged.												
3.3 Disclosure	As there is no change in O-SII buffers the already existing capital buffer regulation stays in place unchanged.												

3.4 Timing of Application	29.12.2020																																																																																																												
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3.6 Review of the measure	March 2021																																																																																																												
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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 colspan="6" style="text-align: left;"><i>Consolidated</i></th> </tr> <tr> <th>Institution</th> <th>EBA Score</th> <th>Size</th> <th>Importance</th> <th>Complexity</th> <th>Interconnectedness</th> </tr> </thead> <tbody> <tr> <td>Erste Group Bank AG</td> <td>2.505</td> <td>2.458</td> <td>2.538</td> <td>3.266</td> <td>1.757</td> </tr> <tr> <td>Raiffeisen Bank International AG</td> <td>1.829</td> <td>1.521</td> <td>1.269</td> <td>2.921</td> <td>1.607</td> </tr> <tr> <td>UniCredit Bank Austria AG</td> <td>1.112</td> <td>1.018</td> <td>1.424</td> <td>959</td> <td>1.046</td> </tr> <tr> <td>BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft</td> <td>535</td> <td>456</td> <td>780</td> <td>473</td> <td>431</td> </tr> <tr> <td>Raiffeisenlandesbank Oberösterreich Aktiengesellschaft</td> <td>492</td> <td>436</td> <td>359</td> <td>355</td> <td>817</td> </tr> <tr> <td>RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung</td> <td>303</td> <td>281</td> <td>253</td> <td>179</td> <td>498</td> </tr> <tr> <td>Volksbank Wien AG</td> <td>204</td> <td>275</td> <td>354</td> <td>74</td> <td>114</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="6" style="text-align: left;"><i>Individual</i></th> </tr> <tr> <th>Institution</th> <th>EBA Score</th> <th>Size</th> <th>Importance</th> <th>Complexity</th> <th>Inter-connectedness</th> </tr> </thead> <tbody> <tr> <td>Erste Group Bank AG</td> <td>1.145</td> <td>663</td> <td>693</td> <td>1.402</td> <td>1.823</td> </tr> <tr> <td>UniCredit Bank Austria AG</td> <td>1.090</td> <td>970</td> <td>1.384</td> <td>890</td> <td>1.115</td> </tr> <tr> <td>Raiffeisen Bank International AG</td> <td>1.087</td> <td>695</td> <td>663</td> <td>1.482</td> <td>1.509</td> </tr> <tr> <td>Raiffeisenlandesbank Oberösterreich Aktiengesellschaft</td> <td>448</td> <td>378</td> <td>306</td> <td>335</td> <td>774</td> </tr> <tr> <td>BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft</td> <td>458</td> <td>381</td> <td>715</td> <td>354</td> <td>385</td> </tr> <tr> <td>RAIFFEISENLANDESBANK NIEDERÖSTERREICH-WIEN AG</td> <td>296</td> <td>267</td> <td>260</td> <td>162</td> <td>494</td> </tr> <tr> <td>Erste Bank der oesterreichischen Sparkassen AG</td> <td>203</td> <td>292</td> <td>275</td> <td>43</td> <td>202</td> </tr> </tbody> </table>	<i>Consolidated</i>						Institution	EBA Score	Size	Importance	Complexity	Interconnectedness	Erste Group Bank AG	2.505	2.458	2.538	3.266	1.757	Raiffeisen Bank International AG	1.829	1.521	1.269	2.921	1.607	UniCredit Bank Austria AG	1.112	1.018	1.424	959	1.046	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	535	456	780	473	431	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	492	436	359	355	817	RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung	303	281	253	179	498	Volksbank Wien AG	204	275	354	74	114	<i>Individual</i>						Institution	EBA Score	Size	Importance	Complexity	Inter-connectedness	Erste Group Bank AG	1.145	663	693	1.402	1.823	UniCredit Bank Austria AG	1.090	970	1.384	890	1.115	Raiffeisen Bank International AG	1.087	695	663	1.482	1.509	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	448	378	306	335	774	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	458	381	715	354	385	RAIFFEISENLANDESBANK NIEDERÖSTERREICH-WIEN AG	296	267	260	162	494	Erste Bank der oesterreichischen Sparkassen AG	203	292	275	43	202
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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: YES which threshold score has been set to identify O-SIIs: 275 which overall score is attributed to the O-SIIs: see 4.1. which of the optional indicators have been used to justify supervisory assessment decisions, if any, and what are the scores: Deposits guaranteed under deposit guarantee system with threshold of 350 (3.5 %) why these optional indicators are relevant for the Member State: Especially institutions with a high degree of guaranteed deposits can cause severe burden or overloading of the financial system in the case of financial difficulties. why the bank is systemically important in terms of those particular optional indicators: Threshold of 350 scores is exceeded whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process: NO names and scores of all relevant entities not excluded from the identification process (could be sent in a separate excel file, see 4.1) whether non-bank institutions have been included in the calculations: NO 																																																																																																												
4.3 Supervisory judgement	<p>2 institutions have been identified through supervisory judgement (deposits guaranteed under deposit guarantee system with threshold of 350 scores):</p> <ul style="list-style-type: none"> Volksbank Wien AG (on consolidated basis of Volksbanken Verbund pursuant to Article 30a Austrian Banking Act) Erste Bank der oesterreichischen Sparkassen AG (individual basis) 																																																																																																												

<p>4.4 Calibrating the O-SII buffer</p>	<p>With regard to the calibration methodology FMA and OeNB established three buckets with different buffer rates dependent on the score whereas every identified institution has to hold an O-SII buffer of at least 1 %:</p> <table border="1" data-bbox="443 304 1417 427"> <thead> <tr> <th>Subcategory</th> <th>O-SII Buffer</th> <th>Scores</th> </tr> </thead> <tbody> <tr> <td>Bucket 3</td> <td>2.0 % CET1</td> <td>≥ 1.000</td> </tr> <tr> <td>Bucket 2</td> <td>1.5 % CET1</td> <td>637 – 999</td> </tr> <tr> <td>Bucket 1</td> <td>1.0 % CET1</td> <td>275 – 636</td> </tr> </tbody> </table> <p>The subcategories enable to differentiate the institutions depending on the score. In particular the difference between EGB, RBI, UniCredit Bank Austria and all other identified institutions is very large and could be considered in the best way possible by the calibration.</p> <p>Institutions, which are identified via supervisory judgement, are assigned to Bucket 1.</p>	Subcategory	O-SII Buffer	Scores	Bucket 3	2.0 % CET1	≥ 1.000	Bucket 2	1.5 % CET1	637 – 999	Bucket 1	1.0 % CET1	275 – 636
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<p>4.5 Effectiveness and proportionality of measure</p>	<p>The O-SII buffer aims to increase the risk-bearing capacity of the systemically important institutions in Austria. However in Austria a systemic risk buffer has been implemented since the beginning of 2016 and the higher of the respective systemic risk buffer and O-SII buffer shall be applied.</p>												
<p>5. Cross-border and cross-sector impact of the measure</p>													
<p>5.1 Assessment of cross-border effects and the likely impact on the internal market (Recommendation ESRB/2015/2)</p>	<p>In line with the findings on the economic impact of the systemic risk buffer at the national level, cross-border effects are expected to be marginally positive.</p>												
<p>5.2 Assessment of leakages and regulatory arbitrage within the notifying Member State</p>	<p>N/A</p>												
<p>6. Combinations and interactions with other measures</p>													
<p>6.1 Combinations between G-SII and O-SII buffers (Article 131.14)</p>	<p>N/A</p>												
<p>6.2 Combinations with SRB buffers (Article 131.14 + Article 133.5)</p>	<p>Are any of the institutions subject to a systemic risk buffer? YES</p> <p>If yes, please provide the following information:</p> <p style="margin-left: 40px;">a. What is the level of the systemic risk buffer (in %) applied to the concerned institution</p>												

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Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	1,00%																										
6.3 O-SII requirement for a subsidiary (Article 131.8)	<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> <p>UniCredit S.p.a.: G-SII / O-SII buffer 1 %</p> <p>For details pls see the decision of the Banca d'Italia.</p>																										
6.4 Interaction with other measures	N/A																										

7. Miscellaneous	
7.1 Contact person(s) at notifying authority	<p>Ursula Hauser-Rethaller (ursula.hauser-rethaller@fma.gv.at) Lucas Grafl (lucas.grafl@fma.gv.at) Simon Smrecnik (simon.smrecnik@fma.gv.at)</p>
7.2 Any other relevant information	<p>The FMA will forward the information regarding the amendment of the Capital Buffer Regulation in line with the implementation of CRD V into Austrian law (Referring to the OSII buffer adjustments related to the additivity of the SRB and the OSII buffer provided for in CRD V) which is scheduled for March 2021, as soon as a more definite timetable will be available.</p>