

INotification template for Article 131 of the Capital Requirements Directive (CRD) – Other Systemically Important Institutions (O-SIIs)

Template for notifying the European Central Bank (ECB) and the European Systemic Risk Board (ESRB) of the setting or resetting of an O-SII buffer under Article 131(7) CRD and of the identity of O-SIIs under Article 131(12) 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) Regulation¹);
- notifications@esrb.europa.eu when notifying the ESRB.

The ESRB will forward this notification to the European Commission, to the European Banking Authority (EBA) and to the competent and designated authorities of the Member States concerned without delay and will publicly disclose the names of the O-SIIs on its website. This notification will be made public by the ESRB once the relevant authorities have adopted and published the notified macroprudential measure².

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																								
1.1 Name of the notifying authority	Austrian Financial Market Authority																							
1.2 Country of the notifying authority	Austria																							
2. Description of the measure																								
2.1a Institution or group of institutions concerned	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;">Name of institution</th> <th style="width: 30%;">LEI</th> <th style="width: 30%;">Consolidation level</th> </tr> </thead> <tbody> <tr> <td>Erste Group Bank AG</td> <td>PQOH26KWDF7CG10L6792</td> <td>consolidated</td> </tr> <tr> <td>Raiffeisen Bank International AG</td> <td>9ZHRYM6F437SQJ6OUG95</td> <td>consolidated</td> </tr> <tr> <td>UniCredit Bank Austria AG</td> <td>D1HEB8VEU6D9M8ZUXG17</td> <td>consolidated</td> </tr> <tr> <td>BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft on the basis of the consolidated situation of BAWAG Group AG</td> <td>529900ICA8XQYGIKR372</td> <td>consolidated</td> </tr> <tr> <td>Raiffeisenlandesbank Oberösterreich Aktiengesellschaft on the basis of the consolidated situation of Raiffeisenbankengruppe OÖ Verbund eGen</td> <td>I6SS27Q1Q3385V753S50</td> <td>consolidated</td> </tr> <tr> <td>RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung</td> <td>529900SXEWJP1MRRX537</td> <td>consolidated</td> </tr> </tbody> </table>			Name of institution	LEI	Consolidation level	Erste Group Bank AG	PQOH26KWDF7CG10L6792	consolidated	Raiffeisen Bank International AG	9ZHRYM6F437SQJ6OUG95	consolidated	UniCredit Bank Austria AG	D1HEB8VEU6D9M8ZUXG17	consolidated	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft on the basis of the consolidated situation of BAWAG Group AG	529900ICA8XQYGIKR372	consolidated	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft on the basis of the consolidated situation of Raiffeisenbankengruppe OÖ Verbund eGen	I6SS27Q1Q3385V753S50	consolidated	RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung	529900SXEWJP1MRRX537	consolidated
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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.

	<p>Volksbank Wien AG in its function as the central organisation pursuant to Article 30a BWG on the basis of the consolidated situation of the Volksbanken Verbund</p>	529900D4CD6DIB3C1904	consolidated																																																
<p>2.1b Changes to the list of institutions concerned</p>	<p>No changes.</p>																																																		
<p>2.2 Level of the buffer applied</p>	<p>List of identified institutions (consolidated)</p> <table border="1" data-bbox="574 817 1441 1198"> <thead> <tr> <th>Name of institution</th> <th>New O-SII buffer</th> <th>Previous O-SII buffer</th> </tr> </thead> <tbody> <tr> <td>Erste Group Bank AG</td> <td>1,00%</td> <td>1,00%</td> </tr> <tr> <td>Raiffeisen Bank International AG</td> <td>1,00%</td> <td>1,00%</td> </tr> <tr> <td>UniCredit Bank Austria AG</td> <td>1,00%</td> <td>1,00%</td> </tr> <tr> <td>BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft</td> <td>0,50%</td> <td>0,50%</td> </tr> <tr> <td>Raiffeisenlandesbank Oberösterreich Aktiengesellschaft</td> <td>0,50%</td> <td>0,50%</td> </tr> <tr> <td>RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung</td> <td>0,50%</td> <td>0,50%</td> </tr> <tr> <td>Volksbank Wien AG</td> <td>0,50%</td> <td>0,50%</td> </tr> </tbody> </table> <p>List of identified institutions (individual)</p> <table border="1" data-bbox="574 1288 1441 1668"> <thead> <tr> <th>Name of institution</th> <th>New O-SII buffer</th> <th>Previous O-SII buffer</th> </tr> </thead> <tbody> <tr> <td>Erste Group Bank AG</td> <td>1,00%</td> <td>1,00%</td> </tr> <tr> <td>Raiffeisen Bank International AG</td> <td>1,00%</td> <td>1,00%</td> </tr> <tr> <td>UniCredit Bank Austria AG</td> <td>1,00%</td> <td>0,50%</td> </tr> <tr> <td>BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft</td> <td>0,50%</td> <td>0,50%</td> </tr> <tr> <td>Raiffeisenlandesbank Oberösterreich Aktiengesellschaft</td> <td>0,50%</td> <td>0,50%</td> </tr> <tr> <td>RAIFFEISENLANDESBANK NIEDERÖSTERREICH-WIEN AG</td> <td>0,50%</td> <td>0,50%</td> </tr> <tr> <td>Erste Bank der oesterreichischen Sparkassen AG</td> <td>0,50%</td> <td>0,50%</td> </tr> </tbody> </table>			Name of institution	New O-SII buffer	Previous O-SII buffer	Erste Group Bank AG	1,00%	1,00%	Raiffeisen Bank International AG	1,00%	1,00%	UniCredit Bank Austria AG	1,00%	1,00%	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	0,50%	0,50%	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	0,50%	0,50%	RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung	0,50%	0,50%	Volksbank Wien AG	0,50%	0,50%	Name of institution	New O-SII buffer	Previous O-SII buffer	Erste Group Bank AG	1,00%	1,00%	Raiffeisen Bank International AG	1,00%	1,00%	UniCredit Bank Austria AG	1,00%	0,50%	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	0,50%	0,50%	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	0,50%	0,50%	RAIFFEISENLANDESBANK NIEDERÖSTERREICH-WIEN AG	0,50%	0,50%	Erste Bank der oesterreichischen Sparkassen AG	0,50%	0,50%
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	Erste Bank der oesterreichischen Sparkassen AG	Erste Group Bank AG	PQOH26KWDF7CG10L6792
2.4 Names of subsidiaries	N/A		
	Name of parent O-SII identified	Name of O-SII subsidiary	LEI of O-SII subsidiary
3. Timing for the measure			
3.1 Timing for the decision	07/12/2021		
3.2 Timing for publication	The expected date of publication will be in December 2021.		
3.3 Disclosure	The identified institutions will be published in the Federal Law Gazette and on the FMA website (https://www.fma.gv.at/banken/makroprudenzielle-bankenaufsicht/details-systemrelevante-institute/).		
3.4 Timing for application	01/01/2022		
3.5 Phasing in	N/A		
	Name of institution	Date1	Date2
		%	%
		%	%
		%	%
3.6 Review of the measure	Year-end 2022.		
4. Reason for O-SII identification and activation of the O-SII buffer			
4.1 Scores of institutions or group of institutions concerned, as per EBA guidelines on the assessment of O-SIIs (Article 131.3 CRD)	Consolidated		
	Name of institution	Size	Substitutability
			Complexity
			Interconnectedness
			Overall Score
	Erste Group Bank AG	2.520	2.439
	Raiffeisen Bank International AG	1.505	1.345
	UniCredit Bank Austria AG	1.036	1.247
	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	482	789
	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	435	433
	RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung	265	273
	Volksbank Wien AG	267	345
			3.407
			1.684
			2.869
			1.621
			1.332
			1.072
			512
			472
			564
			856
			362
			147
			487
			293
			68
			114
			199
	Individual		

	Name of institution	Size	Substitutability	Complexity	Interconnectedness	Overall Score
	Erste Group Bank AG	700	556	1.341	1.788	1.096
	Raiffeisen Bank International AG	722	727	1.441	1.608	1.125
	UniCredit Bank Austria AG	1.078	1.292	922	1.012	1.076
	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	377	381	326	800	471
	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	420	726	414	463	506
	RAIFFEISENLANDESBANK NIEDERÖSTERREICH-WIEN AG	252	265	128	522	292
	Erste Bank der oesterreichischen Sparkassen AG	313	284	42	240	220

Please provide other relevant information (indicator values, methodology, calculations and formulas, data sources, information set used for denominators) in a separate Excel file **see Excel file**.

<p>4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)</p>	<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; whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process NO; the 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.
<p>4.3 Supervisory judgement</p>	<p>2 institutions have been identified through supervisory judgement (deposits guaranteed under deposit guarantee system with threshold of 350 scores):</p> <p>Volksbank Wien AG (on consolidated basis of Volksbanken Verbund pursuant to Article 30a Austrian Banking Act)</p> <p>Erste Bank der oesterreichischen Sparkassen AG (individual basis)</p> <ol style="list-style-type: none"> which of the optional indicators have been used to justify the supervisory assessment decisions, if any, and what the scores were 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
<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. In order to prevent an increase in the effective buffer requirements merely due to the formal-legal changes (additivity of the SyRP (Art 133 CRD V) and the O-SII buffer (Art 131 CRD V)), the overlap of the SyRB and the O-SII buffer was quantified and taken into account accordingly when setting the O-SII buffer. A complete recalibration of the combined buffer requirement including the adaptations resulting from the CRD V is deemed not expedient in the current situation, given the continuous high uncertainty about how the current pandemic-induced crisis will evolve in the future.</p>

			O-SII Buffer before taking into account the additivity and uncertainty	O-SII Buffer after taking into account the additivity and uncertainty
	Subcategory	Scores		
	1	275-636	1.0% CET1	0.5% CET1
	2	637-999	1.5% CET1	0.75% CET1
	3	≥1,000	2.0% CET1	1.0% CET1
	<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>			
4.5 Effectiveness and proportionality of measure	<p>Systemically relevant institutions can pose a risk to the entire financial system of a country or the euro area. The systemic relevance and anticipation of resulting state aid measures in the event of a crisis can lead to moral hazard. The O-SII buffer aims to increase the risk-bearing capacity of the systemically important institutions in Austria. Thus internalise these externalities, to reduce the probability failure and to reduce the social costs in the event of failure.</p>			
5. Sufficiency, consistency and non-overlap of the policy response				
5.1 Sufficiency of the policy response	<p>The scope of the O-SII identification process and the level of O-SII buffers applied are of sufficient nature to significantly mitigate and reduce the contagion effects these institutions could cause. The buffer calibration is structured in that it meets the policy objective while taking into account the importance of structural specifics of the Austrian banking market. Especially including also such institutions with a high degree of guaranteed deposits. The setting of the O-SII buffer aims at increasing the risk-bearing capacity of systemically important institutions, to preserve the built-up capital within these.</p>			
5.2 Consistency of application of the policy response	<p>The policy response of setting an O-SII buffer is consistent with the goal of limiting the potential risks stemming from a failure of these institutions on the overall Austrian banking market. The measure is applied in a consistent manner, strengthening the resilience of financial infrastructure through build-up of loss absorption capacity within these institutions.</p>			
5.3 Non-overlap of the policy response	<p>Are other policy instruments used to address the <u>same</u> systemic risk? No</p>			
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 (Recommendation ESRB/2015/2³)	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.																																
6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State	N/A																																
7. Combinations and interactions with other measures																																	
7.1 Combinations between G-SII and O-SII buffers (Article 131.14)	N/A <table border="1" data-bbox="571 719 1442 869" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Name of institution</th> <th style="width: 25%;">O-SII buffer</th> <th style="width: 25%;">G-SII buffer</th> </tr> </thead> <tbody> <tr> <td></td> <td style="text-align: center;">%</td> <td style="text-align: center;">%</td> </tr> <tr> <td></td> <td style="text-align: center;">%</td> <td style="text-align: center;">%</td> </tr> <tr> <td></td> <td style="text-align: center;">%</td> <td style="text-align: center;">%</td> </tr> </tbody> </table>	Name of institution	O-SII buffer	G-SII buffer		%	%		%	%		%	%																				
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7.2 Combinations with systemic risk buffers (SyRBs) (Article 131.15 CRD)	<p>Are any of the institutions subject to a systemic risk buffer? YES</p> <p>If yes, please provide the following information:</p> <ol style="list-style-type: none"> a. What is the level of the systemic risk buffer (in %) applied to the concerned institution see below b. At what level is/are the systemic risk buffer rate(s) applied (i.e. consolidation level and/or individual)? The systemic risk buffer is applied at the same consolidation level as the O-SII buffer. c. Is the sum of the systemic risk buffer rate(s) and the O-SII buffer rate (or the higher of the G-SII and O-SII buffer rates, if a group is subject to a G-SII buffer and to an O-SII buffer at consolidated level) to which the same institution is subject over 5%? NO <p>Consolidated</p> <table border="1" data-bbox="571 1375 1422 1783" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Name of institution</th> <th style="width: 15%;">SyRB rate</th> <th style="width: 15%;">SyRB application level</th> <th style="width: 20%;">Sum of G-SII/O-SII and SyRB rates</th> </tr> </thead> <tbody> <tr> <td>Erste Group Bank AG</td> <td style="text-align: center;">1,00%</td> <td style="text-align: center;">consolidated</td> <td style="text-align: center;">2,00%</td> </tr> <tr> <td>Raiffeisen Bank International AG</td> <td style="text-align: center;">1,00%</td> <td style="text-align: center;">consolidated</td> <td style="text-align: center;">2,00%</td> </tr> <tr> <td>UniCredit Bank Austria AG</td> <td style="text-align: center;">1,00%</td> <td style="text-align: center;">consolidated</td> <td style="text-align: center;">2,00%</td> </tr> <tr> <td>BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft</td> <td style="text-align: center;">0,50%</td> <td style="text-align: center;">consolidated</td> <td style="text-align: center;">1,00%</td> </tr> <tr> <td>Raiffeisenlandesbank Oberösterreich Aktiengesellschaft</td> <td style="text-align: center;">0,50%</td> <td style="text-align: center;">consolidated</td> <td style="text-align: center;">1,00%</td> </tr> <tr> <td>RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung</td> <td style="text-align: center;">0,50%</td> <td style="text-align: center;">consolidated</td> <td style="text-align: center;">1,00%</td> </tr> <tr> <td>Volksbank Wien AG</td> <td style="text-align: center;">0,50%</td> <td style="text-align: center;">consolidated</td> <td style="text-align: center;">1,00%</td> </tr> </tbody> </table> <p>Individual</p>	Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O-SII and SyRB rates	Erste Group Bank AG	1,00%	consolidated	2,00%	Raiffeisen Bank International AG	1,00%	consolidated	2,00%	UniCredit Bank Austria AG	1,00%	consolidated	2,00%	BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft	0,50%	consolidated	1,00%	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	0,50%	consolidated	1,00%	RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung	0,50%	consolidated	1,00%	Volksbank Wien AG	0,50%	consolidated	1,00%
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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).

	Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O-SII and SyRB rates
	Erste Group Bank AG	1,00%	Individual	2,00%
	Raiffeisen Bank International AG	1,00%	Individual	2,00%
	UniCredit Bank Austria AG	0,50%	Individual	1,50% (as of 01.01.2022)
	Raiffeisenlandesbank Oberösterreich Aktiengesellschaft	0,50%	Individual	1,00%
	RAIFFEISENLANDESBANK NIEDERÖSTERREICH-WIEN AG	0,50%	Individual	1,00%
		%		%
		%		%
		%		%

7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)	<p>If the O-SII is a subsidiary of an EU parent institution 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? UniCredit S.p.a.: G-SII / O-SII buffer 1 % (For details please see the decision of the Banca d'Italia)</p> <p>Does the cap for the subsidiary prevent the implementation of a higher O-SII buffer based on the domestic buffer setting methodology? No</p>		
	Name of O-SII subsidiary	Name of the EU parent of the O-SII subsidiary	Buffer applicable to O-SII EU parent
	UniCredit Bank Austria AG	UniCredit S.p.a.	1,00%
			%
			%

8. Miscellaneous	
8.1 Contact person(s)/mailbox at notifying authority	<p>Ursula Hauser-Rethaller (ursula.hauser-rethaller@fma.gv.at)</p> <p>Lucas Grafl (lucas.grafl@fma.gv.at)</p> <p>Simon Smrechnik (simon.smrechnik@fma.gv.at)</p>
8.2 Any other relevant information	-
8.3 Date of the notification	-