The ESRB template on the O-SII buffer

1. Notifying national authority						
1.1 Name of the notifying authority	Magyar Nemzeti Bank (MNB)					
1.2 Country of the notifying authority	Hungary					
2. Description	n of the measure					
				<u></u>		
	Name of institutio	n		El code		
	OTP Bank Nyrt.			10000A18X956		
2.1a Institution or	Magyar Bankholding Zrt. UniCredit Bank Hungary Zrt.			_MSUC78RN75 /J696PMW8T44		
group of institutions	Kereskedelmi és Hitelbank Zrt.			2LHQFQZDQG45		
concerned	ERSTE BANK HUNGARY Zrt.			HRKLHU2PS28		
Concornica	Raiffeisen Bank Zrt.			(6M7JOL5W45		
	CIB Bank Zrt.			5NIVC0BME80		
	The measure is applied on the h	ighest level of	consolidation.			
	Institutions deleted from the	list since the	last notificatio	n		
2.1b Changes to	MTB Magyar Takarékszövetkez	zeti Bank Zrt.	2594004MC7VOKSK7Z633			
the list of	MKB Bank Nyrt.	FVFED2SHZT16				
institutions concerned	Institutions added to the list since the last notification					
concerneu	Magyar Bankholding Zrt.		529900J3	WLMSUC78RN75		
	Name of institution	New C	-SII buffer	Previous O-SII buffer		
	OTP Bank Nyrt.		0.5%	0%		
	Magyar Bankholding Zrt.	C).25%	0%		
2.2 Level of the	UniCredit Bank Hungary Zrt.	C).25%	0%		
buffer applied	Kereskedelmi és Hitelbank Zrt.	C	0.25%	0%		
	ERSTE BANK HUNGARY Zrt.	0	.125%	0%		
	Raiffeisen Bank Zrt.	0	.125%	0%		
	CIB Bank Zrt.		.125%	0%		
	Name of identified O-SII Ultimate		arent Institution	LEI of ultimate parent institution		
2.3 Name of the	OTP Bank Nyrt. OTP Bank Nyrt.			529900W3MOO00A18X956		
EU ultimate	Magyar Bankholding Zrt. Magyar Bankhold			529900J3WLMSUC78RN75		
parent institution	UniCredit Bank Hungary Zrt. UniCredit Group		UCG)	549300TRUWO2CD2G5692		
-	Kereskedelmi és Hitelbank Zrt.	ereskedelmi és Hitelbank Zrt. KBC Group NV		213800X3Q9LSAKRUWY91		
	ERSTE BANK HUNGARY Zrt.	Erste Group Bank		PQOH26KWDF7CG10L6792		
	Raiffeisen Bank Zrt.	Raiffeisen Bank I		9ZHRYM6F437SQJ6OUG95		
	CIB Bank Zrt.	ank Zrt. Gruppo Intesa Sanpa		2W8N8UU78PMDQKZENC08		

2.4 Names of subsidiaries	The following subsidiaries of OTP latest publicly available informatio • OTP Banka Hrvatska d.d • DSK Bank EAD (Bulgaria • OTP Bank Romania S.A. • SKB d. d. (Slovenia) (LE For a list of subsidiaries, see OTP	n of notification I. (Croatia) (LEI a) (LEI code: 52 . (Romania) (LE I code: 549300 Bank's Annua	is: I code: 5 29900GE El code: H7CCQ0 I Report	299005UJX6 EHODAUTAX 5299003TM0 6BSQBGG72	5K7BQKV05 (UA94) 0P7W8DNU 2)	36) IF61)	
	https://www.otpbank.hu/portal/en/IR/Reports/Annual Other institutions identified as O-SIIs for Hungary do not have any foreign subsidiary identified as O-SII; moreover, they do not have any relevant foreign presence through subsidiaries in any other country.						
3. Timing of t	he measure						
3.1 Timing for the decision	The decision was taken by the Financial Stability Board of the MNB on 28/10/2021						
3.2 Timing for	The intended date of publication is	6.					
publication	30/11/2021						
3.3 Disclosure	The names of the institutions and their effective and expected O-SII capital buffer requirements will be published on the webpage of the MNB.						
3.4 Timing for application	The determined buffers will be applicable from						
	01/01/2022 The current phase-in period for the O-SII buffer requirements runs from 1 January 2022 until 1 January 2024.						
	Institution	Level of the buffer rate applied					
	Institution	From 1 July 2020	2021	2022	2023	2024	
	OTP Bank Nyrt.	0%		0.5%	1%	2%	
3.5 Phasing in	Magyar Bankholding Zrt.	-		0.25%	0.5%	1%	
	UniCredit Bank Hungary Zrt.	0%		0.25%	0.5%	1%	
	Kereskedelmi és Hitelbank Zrt.	0%		0.25%	0.5%	1%	
	ERSTE BANK HUNGARY Zrt.	0%		0.125%	0.25%	0.5% 0.5%	
	Raiffeisen Bank Zrt. CIB Bank Zrt.	0% 0%		0.125%	0.25%	0.5%	
3.6 Review of the measure	The MNB shall annually review the group of institutions identified as O-SIIs and their respective O-SII buffer requirements. (Sections 89 (3) and 90 (3) <i>b</i>) of the Hungarian Banking Act; Article 131(6) of the CRD).						
4. Reason for	r O-SII identification and activatio	-					
4.1 Scores of institutions or group of institutions concerned, as per EBA guidelines	No major changes were made to review. Magyar Bankholding Zrt. operation on 15 December 2020 v Magyar Takarékszövetkezeti Bank Budapest Bank Group. Since the	(Hungarian Ba vith the merger k Zrt. as its pare	ankholdi [·] of the T ent comp	ng Ltd.) com akarék Grou pany), the Mł	nmenced its o (which ha KB Bank Ny	s effective s the MTB rt. and the	

on the assessment of O- Sils (Article 131.3 CRD)	control and group management functions over the three banking groups and plans and manages the finalisation of the merger process. The structural and operational integration under the bankholding is expected to reach such depth by the first half of 2022 that the O-SII identification exercise should reflect the increased systemic importance of the Magyar Bankholding Zrt. and the prescribed capital buffers should take effect on the level of the bankholding where systemically relevant executive decisions are made. The merger creates the second largest banking group in Hungary based on total assets, loans to and deposits from the real economy. The activities of the holding are especially critical in the household and the SME segments; it participates significantly in mortgage bond issuance, it operates an extensive branch network and has gained considerable regional embeddedness. The MNB identified the O-SII institutions according to its methodology determined and published in 2015. First, the scoring methodology described in EBA/GL/2014/10 Title II (6-8) was carried out, applying only the mandatory indicators of Annex 1 of the guidelines. Second, the scores calculated in the first step according to Title II were reweighted and according to Title III weighted optional indicators were added resulting in the final complete indicator set. The final scores are derived from the equally weighted (i.e. a 20 percent weight for each) arithmetic mean of the indicator category scores.							
	Institution	Size	Importance	Complexity	Inter- connectedness	Overall score (Title II)	Additional optional indicators (Title III)	Final overall score
	OTP Bank Nyrt.	4111	3255	3219	2669	3313	3060	3263
	Magyar Bankholding Zrt.	1495	1077	275	1707	1139	1001	1111
	UniCredit Bank Hungary Zrt.	717	1069	843	1180	952	1031	968
	Kereskedelmi és Hitelbank Zrt.	770	802	1026	804	851	767	834
	ERSTE BANK HUNGARY Zrt.	650	635	566	765	654	737	671
	Raiffeisen Bank Zrt.	563	733	540	511	587	523	574
	CIB Bank Zrt.	424	352	397	497	418	581	450
4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)	 a. The MNB followed the EBA/GL/2014/10 guidelines on the assessment of O-SIIs. FINREP data were used for every available case following the guidelines' instructions, but it had to be supplemented by supervisory data reported to MNB for a significant number of institutions (these are typically the non-O-SII banks). b. In 2020 the threshold was lowered from 350 bps to 275 bps in accordance with EBA/GL/2014/10 Title II. For more detailed reasoning, see last year's notification. With the establishment of the Magyar Bankholding Zrt. and the merger of MKB Bank Nyrt., there is no bank with an O-SII score between 275 and 350 bps. c. No credit institution domiciled in Hungary has been excluded because of its total asset size. d. See the annexed excel file. e. Non-bank institutions have not been included in the calculation, because their sectoral and institutional-level systemic importance has been assessed as marrinal 							
4.3 Supervisory judgement	marginal. The scores resulting from the weighted aggregate of the optional indicators are listed in the Table of 4.1 for every institution (see column Additional optional indicators (Title III)). There is no institution which has been identified as O-SII solely as a result of the inclusion of the Optional indicators and which has not been identified as an O-SII based on the standard (Title II) indicators and scores in step 1 (see point a. about the two-phases identification process followed by the MNB). The inclusion of Optional indicators is motivated by their contribution to the accuracy of the representation of relative systemic importance as the buffer calibration is based on the final scores.							

	a. The MNB followed a two-step identification methodology in accordance with the
	a. The MNB followed a two-step identification methodology in accordance with the guidelines. First, all of the institutions which scored equal or higher than 350 bps using the 10 mandatory indicators following the standard identification methodology described in EBA/GL/2014/10 Title II were selected as O-SIIs. Second, a supplementary method was applied in accordance with Title III (13-14) to include the 5 Optional indicators listed below in point d. These indicators were included in order to provide a more robust and relevant country-specific representation of systemic risks in relation to systemic importance. Optional indicators have been quantitatively assessed by aggregating the indicators in a supplementary, additional criterion group. The supplementary criterion group was added to the 4 standard criterion groups with an equal weighting amongst the groups (i.e. 20 percent group weight for every mandatory and for the one supplementary group). In the supplementary criterion group weights for Optional indicators were assigned according to a sum of squares type concentration index. Higher weights were assigned to the Optional indicators which were characterized by higher values of the concentration index. In this way critical activities pursued by fewer important institutions with considerable market shares are deemed to be more important systemically.
	 b. The optional indicators taken from Annex 2 of the guidelines which have been found relevant are the following: d1. Off-balance sheet items – market share based indicator aggregating outstanding credit facilities, guarantees and other off-balance sheet items carrying
	credit risk.
	d2. Share in clearing and settlement system – summarizes information about the market share of retail customers' transactions in the clearing system (based on the volume and number of transactions).
	d3. Assets under custody – market share in outstanding assets under custody.
	d4. Interbank claims and/or liabilities – centrality based analysis transformed into an additive indicator of unsecured interbank loans and deposits.
	 d5. Market transaction volumes or values – centrality based analysis transformed into an additive indicator of FX swap transactions between credit institutions. c. The Optional indicators add substantial information about critical financial activities which are the least likely to be represented by the mandatory indicators. These indicators were selected based on analysis of correlations between basic and supplementary indicators and further expert judgement. Also these indicators proxy critical functions with high country specific importance and problematic
	substitutability for agents of the real economy (d1. and d2.) or the financial system (d3.) and help to describe financial interconnectedness of credit institutions including network analysis approach highlighting the most important inter-bank market segments (d4. and d5.).
	The decision of the MNB on 1 April 2020 to temporarily release and gradually build back the O-SII buffers in the period 2022-2024 was calibrated with the aim of providing sufficient lending capacity to the systemically important credit institutions.
4.4 Calibrating the O-SII buffer	The envisaged buffer build-up paths are based on the latest calibration exercise of the MNB. For further information on the calibration, see: https://www.esrb.europa.eu/pub/pdf/other/esrb.notification200214_osii_hu~fdad1aa469.en .pdf Since then, the institution of the Magyar Bankholding Zrt. made it necessary to supplement the calibration to cover the newly established institution. The buffer rate for the bankholding has been determined based on the distribution of and distance between the O-SII scores.
	In 2023, temporary buffer rates are expected to be increased by one-quarter of the expected final buffer rates on the planned buffer build-up path. The MNB will modify the amount of the

	final buffer rates and adjust the rates along the build-up path if material future changes in the systemic importance of the credit institutions necessitate it during the annual revisions.
	Depsite the prevailing extraordinary economic conditions and uncertainty in economic outlook caused by the coronavirus pandemic, the banking system has been able to maintain both a steady credit supply to the real economy and stable capital positions. Therefore it is adequate to end the temporary release of the O-SII capital buffers, which was started in 2020, and to start the phase-in of the buffers as planned without considerably constraining the lending capacity of the credit institutions concerned.
4.5 Effectiveness and proportionality of measure	The envisaged two-year-long phase-in is expected to improve effectivity as it provides incentives for institutions to plan with and utilize this time interval for lending. Moreover, the phase-in period leaves enough time for the build-up of the capital buffers without hampering the ability of the banking system to sustainably contribute to economic growth while starting to rebuild its loss absorbing capacity.
	The final buffer rates applicable are compatible with the calibration carried out as part of the last regular review of the O-SII identification and calibration exercise at the end of 2019. Therefore, the reasoning for their effectiveness and proportionality can be found in the related notification: <u>https://www.esrb.europa.eu/pub/pdf/other/esrb.notification200214_osii_hu~fdad1aa469.en</u> <u>.pdf</u>
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5. Sufficiency	y, consistency and non-overlap of the policy response
5.1 Sufficiency of the policy response	The CRDV framework designates the O-SII capital buffer as a singly available policy instrument to macroprudential authorities to strengthen the resilience and correct misaligned incentives of systemically important banks. The MNB has been prescribing a significant non-zero buffer rate to every identified institution in proportion to their systemic importance represented by the scores covering an extended range of relevant systemic risk indicators. The proportionality of the buffer rates with the scores provides sufficient additional loss absorbing capacity to mitigate the different expected systemic impacts of O-SII banks' failure according to the risk tolerance of the regulator.
	The temporary release of the O-SII capital buffer between 2020 H2 and 2021 has not weakened the capital position of the institutions concerned, rebuilding the buffers following the previously communicated phase-in plans safeguards the availability of solvency capital on the long run, while it promotes credibility and graduality.
5.2 Consistency of application of the policy response	Across Member States consistency is provided by following the relevant European requirements and guidelines, the CRD and the EBA/GL/2014/10, in carrying out the annual O-SII identification and the setting of the buffer rates. The level of the buffer rates are comparable to those set by other Member States for O-SII banks with similar systemic importance scores. Also the proposed buffer rates are above the ECB O-SII buffer rate floors.
	Within Member State consistency is realized across banks by the proportionality of the buffer rates to the O-SII scores and in time by the stability of the methodology applied.
5.3 Non-overlap of the policy response	O-SIIs are subject to intensified supervisory attention and appropriate resolution planning, however, there are no other macroprudential policy instruments used with a macroprudential approach to preventively address the systemic risks which are targeted by the O-SII buffer.

6. Cross-bord	der and cross-sector impact of the measure
	 a. Based on the assessment of the transmission channels of cross-border risk adjustment and regulatory arbitrage provided by the ESRB Handbook on Operationalising Macro- prudential Policy in the Banking Sector (Chapter 11) the possible negative cross-border impact of the measure is expected to be limited. b.
6.1 Assessment of cross-border effects and the likely impact on the Internal Market (Recommendatio n ESRB/2015/2 ¹)	 Inward spillovers: The possible cross-border impact (leakages and regulatory arbitrage) is expected to be limited in Hungary. A possible channel of circumvention, the extension in systemic importance of branches or systemically less important institutions has not been observed in the previous years. Outward spillovers: The MNB still does not expect material negative cross-border effects on other Member States or on the Single Market. The increased resilience of the O-SIIs is beneficial for their stakeholders in other Member States and contributes to the functioning, financial integration and harmonized regulation of the single market. Within the identified O-SIIs only OTP Group has substantial cross-border activity. As the O-SII buffers are applied on the highest level of consolidation, the realised O-SII buffer of the OTP Group does not incentivize the cross-border reallocation of banking activities from or to other Member States. Five of the seven identified O-SIIs are foreign parents' subsidiaries operating in Hungary. The relatively limited size of these subsidiaries within their respective banking groups does not make a significant impact likely. Due to the phase in paried which eat to in 2022, these subsidiaries have been able to phase in activities.
6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State	 phase-in period which starts in 2022, these subsidiaries have been able to plan compliance and gradually allocate the necessary solvency capital. Although systemically important banks face higher capital buffer requirements than other non-OSII banks, further institutions are going to be automatically identified as O-SIIs if they grow significantly in size, in providing critical financial functions or in their interconnectedness. Consequently, if any such non-OSII credit institution grows due to its regulatory advantage of not being covered by the O-SII capital buffer regulation, the O-SII buffer requirements are going to be imposed on it following the regular yearly revision of systemic importance (or in case any unique incidence may render the revision necessary in-between the regular yearly reassessments). Furthermore, any cross-sectoral leakage that may increase the systemic relevance of non-bank financial institutions (e.g. investment firms) will be evaluated regularly and taken into account when identifying systemic institutions, but has not been observed so far.
7.1 Combinations	ons and interactions with other measures
between G-SII and O-SII buffers	The MNB has not identified any institutions as G-SIIs within its jurisdiction.
(Article 131.14) 7.2 Combinations with systemic risk buffers (SyRBs) (Article 131.15 CRD)	Currently there are no banks which are required to maintain a systemic risk buffer, the regulation is suspended to mitigate the impacts of the emergency situation related to the coronavirus outbreak on the financial intermediary system. For further information on the systemic risk buffer, see the announcements on the following website: https://www.mnb.hu/en/financial-stability/macroprudential-policy/the-macroprudential-toolkit/instruments-to-limit-excessive-exposure-concentrations

¹ 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).

7.3 O-SII requirement for a subsidiary (Article 131.8	Name of O-SII subsidiary	Name of the EU parent of the O-SII subsidiary	Final O-SII buffer of the parent	G-SII buffer of the parent		
	UniCredit Bank Hungary Zrt.	UniCredit S.p.A.	1%	1%		
	Kereskedelmi és Hitelbank Zrt.	KBC Group NV	1.5%	-		
	Raiffeisen Bank Zrt.	Raiffeisen Bank International AG	2%	-		
CRD)	ERSTE BANK HUNGARY Zrt.	Erste Group Bank AG	2%	-		
	CIB Bank Zrt.	Intesa Sanpaolo S.p.A.	0.75%	-		
8. Miscellane	ous					
8.1 Contact person(s)/mailbo x at notifying authority	nailbo Phone: +36 (1) 428 2600/1874					
8.2 Any other relevant						
information						
8.3 Date of the notification	29/10/2021					