



## Notification 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](mailto:macropru.notifications@ecb.europa.eu) when notifying the ECB (under Article 5 of the Single Supervisory Mechanism (SSM) Regulation<sup>1</sup>);
- [DARWIN/ASTRA](#) 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 measure<sup>2</sup>.

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                 | Finansinspektionen (Swedish Financial Supervisory Authority) |                      |                     |
| 1.2 Country of the notifying authority              | Sweden   |                      |                     |
| 2. Description of the measure                       |  |                      |                     |
| 2.1a Institution or group of institutions concerned | -  |                      |                     |
|   | Name of institution  | LEI                  | Consolidation level |
|   | Skandinaviska Enskilda Banken AB                             | F3JS33DEI6XQ4ZBPTN86 | consolidated        |
|   | Swedbank AB  | M312WZV08Y7LYUC71685 | consolidated        |
|   | Svenska Handelsbanken AB                                     | NHBDILHZTYCNBV5UYZ31 | consolidated        |
|   | Nordea Hypotek AB  | 5493000K2HPWIF6MFO29 | individual          |
|   |  |                      |                     |
|   |  |                      |                     |
|   |  |                      |                     |
|   |  |                      |                     |

<sup>1</sup> 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).

<sup>2</sup> 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.

| <b>2.1b Changes to the list of institutions concerned</b>                    | No changes.   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|--|---|------------------------------------|-------|-------|-------|--|---------------------------------|--------------------------------|------------------------------------|----------------------------------|-----------------|----------------------|-------------|-------|-------|--------------------------|-------|-------|-------------------|-------|-------|---|---|---|--|--|--|
| <b>2.2 Level of the buffer applied</b>                                       | At what level is the fully phased-in buffer (in %) applied to the institution(s)?   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  | <table border="1"> <thead> <tr> <th data-bbox="568 331 833 362">Name of institution</th> <th data-bbox="839 331 1152 362">New O-SII buffer</th> <th data-bbox="1158 331 1436 362">Previous O-SII buffer</th> </tr> </thead> <tbody> <tr> <td data-bbox="568 371 833 421">Skandinaviska Enskilda Banken AB</td> <td data-bbox="839 371 1152 421">1,00%</td> <td data-bbox="1158 371 1436 421">1,00%</td> </tr> <tr> <td data-bbox="568 430 833 461">Swedbank AB</td> <td data-bbox="839 430 1152 461">1,00%</td> <td data-bbox="1158 430 1436 461">1,00%</td> </tr> <tr> <td data-bbox="568 470 833 501">Svenska Handelsbanken AB</td> <td data-bbox="839 470 1152 501">1,00%</td> <td data-bbox="1158 470 1436 501">1,00%</td> </tr> <tr> <td data-bbox="568 510 833 542">Nordea Hypotek AB</td> <td data-bbox="839 510 1152 542">1,00%</td> <td data-bbox="1158 510 1436 542">1,00%</td> </tr> <tr> <td data-bbox="568 551 833 582"></td> <td data-bbox="839 551 1152 582"></td> <td data-bbox="1158 551 1436 582"></td> </tr> <tr> <td data-bbox="568 591 833 622"></td> <td data-bbox="839 591 1152 622"></td> <td data-bbox="1158 591 1436 622"></td> </tr> </tbody> </table> |                                    |       |       |       |  | Name of institution             | New O-SII buffer               | Previous O-SII buffer              | Skandinaviska Enskilda Banken AB | 1,00%           | 1,00%                | Swedbank AB | 1,00% | 1,00% | Svenska Handelsbanken AB | 1,00% | 1,00% | Nordea Hypotek AB | 1,00% | 1,00% |   |   |   |  |  |  |
| Name of institution  | New O-SII buffer  | Previous O-SII buffer              |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| Skandinaviska Enskilda Banken AB   | 1,00%   | 1,00%                              |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| Swedbank AB  | 1,00%   | 1,00%                              |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| Svenska Handelsbanken AB   | 1,00%   | 1,00%                              |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| Nordea Hypotek AB  | 1,00%   | 1,00%                              |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| <b>2.3 Name of the ultimate EU parent institution</b>                        | <table border="1"> <thead> <tr> <th data-bbox="568 663 868 694">Name of identified O-SII</th> <th data-bbox="874 663 1168 694">Ultimate EU parent institution</th> <th data-bbox="1174 663 1436 712">LEI of ultimate parent institution</th> </tr> </thead> <tbody> <tr> <td data-bbox="568 725 868 757">Nordea Hypotek AB</td> <td data-bbox="874 725 1168 757">Nordea Bank Abp</td> <td data-bbox="1174 725 1436 757">529900ODI3047E2LIV03</td> </tr> <tr> <td data-bbox="568 766 868 797"></td> <td data-bbox="874 766 1168 797"></td> <td data-bbox="1174 766 1436 797"></td> </tr> <tr> <td data-bbox="568 806 868 837"></td> <td data-bbox="874 806 1168 837"></td> <td data-bbox="1174 806 1436 837"></td> </tr> <tr> <td data-bbox="568 846 868 878"></td> <td data-bbox="874 846 1168 878"></td> <td data-bbox="1174 846 1436 878"></td> </tr> <tr> <td data-bbox="568 887 868 918"></td> <td data-bbox="874 887 1168 918"></td> <td data-bbox="1174 887 1436 918"></td> </tr> </tbody> </table>   |                                    |       |       |       |  | Name of identified O-SII        | Ultimate EU parent institution | LEI of ultimate parent institution | Nordea Hypotek AB                | Nordea Bank Abp | 529900ODI3047E2LIV03 |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| Name of identified O-SII   | Ultimate EU parent institution  | LEI of ultimate parent institution |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| Nordea Hypotek AB  | Nordea Bank Abp   | 529900ODI3047E2LIV03               |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| <b>2.4 Names of subsidiaries</b>   | <table border="1"> <thead> <tr> <th data-bbox="568 999 868 1048">Name of parent O-SII identified</th> <th data-bbox="874 999 1168 1030">Name of O-SII subsidiary</th> <th data-bbox="1174 999 1436 1030">LEI of O-SII subsidiary</th> </tr> </thead> <tbody> <tr> <td data-bbox="568 1057 868 1088"></td> <td data-bbox="874 1057 1168 1088"></td> <td data-bbox="1174 1057 1436 1088"></td> </tr> <tr> <td data-bbox="568 1097 868 1128"></td> <td data-bbox="874 1097 1168 1128"></td> <td data-bbox="1174 1097 1436 1128"></td> </tr> <tr> <td data-bbox="568 1137 868 1169"></td> <td data-bbox="874 1137 1168 1169"></td> <td data-bbox="1174 1137 1436 1169"></td> </tr> <tr> <td data-bbox="568 1178 868 1209"></td> <td data-bbox="874 1178 1168 1209"></td> <td data-bbox="1174 1178 1436 1209"></td> </tr> <tr> <td data-bbox="568 1218 868 1249"></td> <td data-bbox="874 1218 1168 1249"></td> <td data-bbox="1174 1218 1436 1249"></td> </tr> </tbody> </table>  |                                    |       |       |       |  | Name of parent O-SII identified | Name of O-SII subsidiary       | LEI of O-SII subsidiary            |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| Name of parent O-SII identified  | Name of O-SII subsidiary  | LEI of O-SII subsidiary            |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| <b>3. Timing for the measure</b>   |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| <b>3.1 Timing for the decision</b>   | 07/06/2024  |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| <b>3.2 Timing for publication</b>  | 07/06/2024  |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| <b>3.3 Disclosure</b>  | Publish on our website, <a href="http://www.fi.se">www.fi.se</a> .  |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| <b>3.4 Timing for application</b>  | 01/01/2025.   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| <b>3.5 Phasing in</b>  | <p>N/A</p> <table border="1"> <thead> <tr> <th data-bbox="568 1729 887 1760">Name of institution</th> <th data-bbox="893 1729 1002 1760">Date1</th> <th data-bbox="1008 1729 1117 1760">Date2</th> <th data-bbox="1123 1729 1232 1760">Date3</th> <th data-bbox="1238 1729 1347 1760">Date4</th> <th data-bbox="1353 1729 1442 1760">Date5</th> </tr> </thead> <tbody> <tr> <td data-bbox="568 1769 887 1800"></td> <td data-bbox="893 1769 1002 1800">%</td> <td data-bbox="1008 1769 1117 1800">%</td> <td data-bbox="1123 1769 1232 1800">%</td> <td data-bbox="1238 1769 1347 1800">%</td> <td data-bbox="1353 1769 1442 1800">%</td> </tr> <tr> <td data-bbox="568 1809 887 1841"></td> <td data-bbox="893 1809 1002 1841">%</td> <td data-bbox="1008 1809 1117 1841">%</td> <td data-bbox="1123 1809 1232 1841">%</td> <td data-bbox="1238 1809 1347 1841">%</td> <td data-bbox="1353 1809 1442 1841">%</td> </tr> </tbody> </table>  |                                    |       |       |       |  | Name of institution             | Date1                          | Date2                              | Date3                            | Date4           | Date5                |             | %     | %     | %                        | %     | %     |                   | %     | %     | % | % | % |  |  |  |
| Name of institution  | Date1   | Date2                              | Date3 | Date4 | Date5 |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  | %   | %                                  | %     | %     | %     |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
|  | %   | %                                  | %     | %     | %     |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| <b>3.6 Review of the measure</b>   | Year-end 2025   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |
| <b>4. Reason for O-SII identification and activation of the O-SII buffer</b> |   |                                    |       |       |       |  |                                 |                                |                                    |                                  |                 |                      |             |       |       |                          |       |       |                   |       |       |   |   |   |  |  |  |

| <p><b>4.1 Scores of institutions or group of institutions concerned, as per EBA guidelines on the assessment of O-SIIs (Article 131.3 CRD)</b></p> | <p>Please list here the names, overall scores and category scores of the O-SIIs identified based on</p> <ol style="list-style-type: none"> <li>size;</li> <li>importance for the economy of the relevant Member State or the Union, capturing substitutability/financial institution infrastructure;</li> <li>complexity, including the additional complexities from cross-border activity;</li> <li>interconnectedness of the institution or (sub-)group with the financial system.</li> </ol> <table border="1" data-bbox="571 555 1437 958"> <thead> <tr> <th>Name of institution</th> <th>Size</th> <th>Substitutability</th> <th>Complexity</th> <th>Interconnectedness</th> <th>Overall Score</th> </tr> </thead> <tbody> <tr> <td>Skandinaviska Enskilda Banken AB</td> <td>2015</td> <td>1961</td> <td>4003</td> <td>2580</td> <td>2640</td> </tr> <tr> <td>Swedbank AB</td> <td>1589</td> <td>1823</td> <td>2879</td> <td>1227</td> <td>1879</td> </tr> <tr> <td>Svenska Handelsbanken AB</td> <td>2077</td> <td>1559</td> <td>1560</td> <td>1366</td> <td>1641</td> </tr> <tr> <td>Nordea Hypotek AB</td> <td>478</td> <td>257</td> <td>4</td> <td>707</td> <td>362</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | Name of institution | Size       | Substitutability   | Complexity    | Interconnectedness | Overall Score | Skandinaviska Enskilda Banken AB | 2015 | 1961 | 4003 | 2580 | 2640 | Swedbank AB | 1589 | 1823 | 2879 | 1227 | 1879 | Svenska Handelsbanken AB | 2077 | 1559 | 1560 | 1366 | 1641 | Nordea Hypotek AB | 478 | 257 | 4 | 707 | 362 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|--|--|---------------------|------------|--------------------|---------------|--------------------|---------------|----------------------------------|------|------|------|------|------|-------------|------|------|------|------|------|--------------------------|------|------|------|------|------|-------------------|-----|-----|---|-----|-----|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| Name of institution  | Size   | Substitutability    | Complexity | Interconnectedness | Overall Score |                    |               |                                  |      |      |      |      |      |             |      |      |      |      |      |                          |      |      |      |      |      |                   |     |     |   |     |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Skandinaviska Enskilda Banken AB   | 2015   | 1961                | 4003       | 2580               | 2640          |                    |               |                                  |      |      |      |      |      |             |      |      |      |      |      |                          |      |      |      |      |      |                   |     |     |   |     |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Swedbank AB  | 1589   | 1823                | 2879       | 1227               | 1879          |                    |               |                                  |      |      |      |      |      |             |      |      |      |      |      |                          |      |      |      |      |      |                   |     |     |   |     |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Svenska Handelsbanken AB   | 2077   | 1559                | 1560       | 1366               | 1641          |                    |               |                                  |      |      |      |      |      |             |      |      |      |      |      |                          |      |      |      |      |      |                   |     |     |   |     |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Nordea Hypotek AB  | 478  | 257                 | 4          | 707                | 362           |                    |               |                                  |      |      |      |      |      |             |      |      |      |      |      |                          |      |      |      |      |      |                   |     |     |   |     |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |                     |            |                    |               |                    |               |                                  |      |      |      |      |      |             |      |      |      |      |      |                          |      |      |      |      |      |                   |     |     |   |     |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |                     |            |                    |               |                    |               |                                  |      |      |      |      |      |             |      |      |      |      |      |                          |      |      |      |      |      |                   |     |     |   |     |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |                     |            |                    |               |                    |               |                                  |      |      |      |      |      |             |      |      |      |      |      |                          |      |      |      |      |      |                   |     |     |   |     |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |                     |            |                    |               |                    |               |                                  |      |      |      |      |      |             |      |      |      |      |      |                          |      |      |      |      |      |                   |     |     |   |     |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| <p><b>4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)</b></p>   | <p>Please provide information on:</p> <ol style="list-style-type: none"> <li>whether you followed the EBA guidelines on the assessment of O-SIIs;<br/><b>Yes</b></li> <li>which threshold score has been set to identify O-SIIs;<br/><b>350</b></li> <li>whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process;<br/><b>No</b></li> <li>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);<br/><b>Please see 3.3</b></li> <li>whether non-bank institutions have been included in the calculations.<br/><b>Yes, non-bank institutions under CRR/CRD were included.</b></li> </ol>   |                     |            |                    |               |                    |               |                                  |      |      |      |      |      |             |      |      |      |      |      |                          |      |      |      |      |      |                   |     |     |   |     |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| <p><b>4.3 Supervisory judgement</b></p>  |  |                     |            |                    |               |                    |               |                                  |      |      |      |      |      |             |      |      |      |      |      |                          |      |      |      |      |      |                   |     |     |   |     |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| <p><b>4.4 Calibrating the O-SII buffer</b></p>   | <p>Skandinaviska Enskilda Banken AB, Svenska Handelsbanken AB, Swedbank AB and Nordea Hypotek AB shall be subject to an O-SII buffer of 1 % because they, through their operations separately create risks that not only can affect the own institution's survival but also lead to risks for the stability of the financial system. FI has concluded that these risks require an add-on of at least 1pp for each of the three largest banks O-SII.</p>  |                     |            |                    |               |                    |               |                                  |      |      |      |      |      |             |      |      |      |      |      |                          |      |      |      |      |      |                   |     |     |   |     |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |

|   |   |
|---|---|
|   | Nordea Hypotek AB is a subsidiary and is subject to the capital requirements set by the Finnish authorities on its parent Nordea Bank Abp. Finansinspektionen has judged it necessary to set an additional buffer requirement of 1pp on the subsidiary.   |
| <b>4.5 Effectiveness and proportionality of measure</b>   | The O-SII buffer covers risks that the other measures in CRR and CRD do not cover. Given the amendments to CRR and CRD, including e.g. the pillar 2 guidance, Finansinspektionen considers that the O-SII buffer shall be 1 %.  |
| <b>5. Sufficiency, consistency and non-overlap of the policy response</b>   |   |
| <b>5.1 Sufficiency of the policy response</b>   | FI does not believe that a 1% O-SII buffer in isolation is sufficient to completely mitigate the risks mentioned in section 4.4. As such, and taking into account the accumulation rules of the O-SII buffer and Systemic Risk Buffer when applied at the consolidated level, additional capital requirements have been applied to the three large Swedish O-SIIs via the SRB and Pillar 2 in order to mitigate the individual and aggregate risks. Note, however, that the un-addressed O-SII risk encompasses only a small part of the justification for these additional measures.   |
| <b>5.2 Consistency of application of the policy response</b>  | 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 Swedish 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.   |
| <b>5.3 Non-overlap of the policy response</b>   | No other policy instruments used to address the same systemic risk. Svenska Handelsbanken AB, Swedbank AB, Skandinaviska Enskilda Banken AB are subject to an O-SII buffer, a systemic risk buffer and a risk weight floor for mortgages via article 458. The measures cover different risks and complement each other.   |
| <b>6. Cross-border and cross-sector impact of the measure</b>   |   |
| <b>6.1 Assessment of cross-border effects and the likely impact on the Internal Market<br/>(Recommendation ESRB/2015/2<sup>3</sup>)</b> | <p>FI does not expect the measure to have any negative consequences on the functioning of the single market. The O-SII buffer is placed on Svenska Handelsbanken AB's, Swedbank AB's and Skandinaviska Enskilda Banken AB's total exposures, thus no difference is made based on the domicile of the exposures.</p> <p>The introduction of the O-SII buffer on Nordea Hypotek AB is expected to have limited negative cross-border effects due to that its parent Nordea Bank Abp is subject to an O-SII buffer requirement on the group level. Furthermore, the corresponding individual Nordea mortgage lending subsidiaries in Denmark and Norway have O-SII buffers of similar size as Nordea Hypotek AB.</p> |

<sup>3</sup> 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).

|   | <p>When a few banks dominate a national banking system, the risk is that the markets perceive them to be subject to some form of implicit state guarantee, especially in countries with strong fiscal positions such as Sweden. The additional capital requirements for the large banks could be seen as somewhat reducing this competitive advantage, a measure which should be regarded as positive for the single market.</p>   |                        |                                   |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
|---|--|------------------------|-----------------------------------|------------------------|-----------------------------------|----------------------------------|-------|--------------|-------|-------------|-------|--------------|-------|--------------------------|-------|--------------|-------|--|---|--|---|--|---|--|---|--|---|--|---|--|---|--|---|--|---|--|---|
| <p><b>6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State</b></p> | <p>As regards domestic implications, the differences between the total structural buffers for the biggest Swedish institutions are kept at their previous levels. They will not be prevented from continuing the development of their activities, both locally and in the EU, given that they continue to be well capitalized, with levels above the minimum requirement.</p> <p>The assessment that the regulatory arbitrage will be limited is also based on that the other Nordic banks with material operations in Sweden are subject to O-SII buffer requirements.</p>  |                        |                                   |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
| <p><b>7. Combinations and interactions with other measures</b></p>                                  |  |                        |                                   |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
| <p><b>7.1 Combinations between G-SII and O-SII buffers</b><br/><b>(Article 131.14)</b></p>          | <p>There are no entities in Sweden subject to both buffers.</p> <table border="1" data-bbox="571 974 1441 1122"> <thead> <tr> <th data-bbox="571 974 927 1014">Name of institution</th> <th data-bbox="927 974 1214 1014">O-SII buffer</th> <th data-bbox="1214 974 1441 1014">G-SII buffer</th> </tr> </thead> <tbody> <tr> <td data-bbox="571 1014 927 1048"></td> <td data-bbox="927 1014 1214 1048" style="text-align: center;">%</td> <td data-bbox="1214 1014 1441 1048" style="text-align: center;">%</td> </tr> <tr> <td data-bbox="571 1048 927 1081"></td> <td data-bbox="927 1048 1214 1081" style="text-align: center;">%</td> <td data-bbox="1214 1048 1441 1081" style="text-align: center;">%</td> </tr> <tr> <td data-bbox="571 1081 927 1115"></td> <td data-bbox="927 1081 1214 1115" style="text-align: center;">%</td> <td data-bbox="1214 1081 1441 1115" style="text-align: center;">%</td> </tr> </tbody> </table>  | Name of institution    | O-SII buffer                      | G-SII buffer           |                                   | %                                | %     |              | %     | %           |       | %            | %     |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
| Name of institution   | O-SII buffer   | G-SII buffer           |                                   |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
|   | %  | %                      |                                   |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
|   | %  | %                      |                                   |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
|   | %  | %                      |                                   |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
| <p><b>7.2 Combinations with systemic risk buffers (SyRBs)</b><br/><b>(Article 131.15 CRD)</b></p>   | <p>Are any of the institutions identified as O-SIIs subject to a systemic risk buffer?<br/>If yes, please provide the following information:</p> <p>a. What is/are the systemic risk buffer rates(s)?<br/><b>See below</b></p> <p>b. At what level is/are the systemic risk buffer rate(s) applied (i.e. consolidation level and/or individual)?<br/><b>The systemic risk buffer is applied at the same consolidation level as the O-SII buffer.</b></p> <p>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%?<br/><b>No</b></p> <table border="1" data-bbox="571 1653 1422 2022"> <thead> <tr> <th data-bbox="571 1653 890 1686">Name of institution</th> <th data-bbox="890 1653 1098 1686">SyRB rate</th> <th data-bbox="1098 1653 1249 1731">SyRB application level</th> <th data-bbox="1249 1653 1422 1731">Sum of G-SII/O-SII and SyRB rates</th> </tr> </thead> <tbody> <tr> <td data-bbox="571 1731 890 1765">Skandinaviska Enskilda Banken AB</td> <td data-bbox="890 1731 1098 1765" style="text-align: center;">3,00%</td> <td data-bbox="1098 1731 1249 1765" style="text-align: center;">consolidated</td> <td data-bbox="1249 1731 1422 1765" style="text-align: center;">4,00%</td> </tr> <tr> <td data-bbox="571 1765 890 1798">Swedbank AB</td> <td data-bbox="890 1765 1098 1798" style="text-align: center;">3,00%</td> <td data-bbox="1098 1765 1249 1798" style="text-align: center;">consolidated</td> <td data-bbox="1249 1765 1422 1798" style="text-align: center;">4,00%</td> </tr> <tr> <td data-bbox="571 1798 890 1832">Svenska Handelsbanken AB</td> <td data-bbox="890 1798 1098 1832" style="text-align: center;">3,00%</td> <td data-bbox="1098 1798 1249 1832" style="text-align: center;">consolidated</td> <td data-bbox="1249 1798 1422 1832" style="text-align: center;">4,00%</td> </tr> <tr> <td data-bbox="571 1832 890 1865"></td> <td data-bbox="890 1832 1098 1865" style="text-align: center;">%</td> <td data-bbox="1098 1832 1249 1865"></td> <td data-bbox="1249 1832 1422 1865" style="text-align: center;">%</td> </tr> <tr> <td data-bbox="571 1865 890 1899"></td> <td data-bbox="890 1865 1098 1899" style="text-align: center;">%</td> <td data-bbox="1098 1865 1249 1899"></td> <td data-bbox="1249 1865 1422 1899" style="text-align: center;">%</td> </tr> <tr> <td data-bbox="571 1899 890 1933"></td> <td data-bbox="890 1899 1098 1933" style="text-align: center;">%</td> <td data-bbox="1098 1899 1249 1933"></td> <td data-bbox="1249 1899 1422 1933" style="text-align: center;">%</td> </tr> <tr> <td data-bbox="571 1933 890 1966"></td> <td data-bbox="890 1933 1098 1966" style="text-align: center;">%</td> <td data-bbox="1098 1933 1249 1966"></td> <td data-bbox="1249 1933 1422 1966" style="text-align: center;">%</td> </tr> <tr> <td data-bbox="571 1966 890 2000"></td> <td data-bbox="890 1966 1098 2000" style="text-align: center;">%</td> <td data-bbox="1098 1966 1249 2000"></td> <td data-bbox="1249 1966 1422 2000" style="text-align: center;">%</td> </tr> </tbody> </table> | Name of institution    | SyRB rate                         | SyRB application level | Sum of G-SII/O-SII and SyRB rates | Skandinaviska Enskilda Banken AB | 3,00% | consolidated | 4,00% | Swedbank AB | 3,00% | consolidated | 4,00% | Svenska Handelsbanken AB | 3,00% | consolidated | 4,00% |  | % |  | % |  | % |  | % |  | % |  | % |  | % |  | % |  | % |  | % |
| Name of institution   | SyRB rate  | SyRB application level | Sum of G-SII/O-SII and SyRB rates |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
| Skandinaviska Enskilda Banken AB  | 3,00%  | consolidated           | 4,00%                             |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
| Swedbank AB   | 3,00%  | consolidated           | 4,00%                             |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
| Svenska Handelsbanken AB  | 3,00%  | consolidated           | 4,00%                             |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
|   | %  |                        | %                                 |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
|   | %  |                        | %                                 |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
|   | %  |                        | %                                 |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
|   | %  |                        | %                                 |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |
|   | %  |                        | %                                 |                        |                                   |                                  |       |              |       |             |       |              |       |                          |       |              |       |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |  |   |

| <p><b>7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)</b></p> | <p><b>For Nordea Hypotek AB, its parent – Nordea Bank Abp – is subject to a 2.5% O-SII buffer.</b></p> <p>Does the cap for the subsidiary prevent the implementation of a higher O-SII buffer based on the domestic buffer setting methodology?</p> <p><b>No</b></p> <table border="1" data-bbox="571 394 1422 595"> <thead> <tr> <th data-bbox="571 394 890 483">Name of O-SII subsidiary</th> <th data-bbox="892 394 1249 483">Name of the EU parent of the O-SII subsidiary</th> <th data-bbox="1251 394 1422 483">Buffer applicable to O-SII EU parent</th> </tr> </thead> <tbody> <tr> <td data-bbox="571 486 890 517">Nordea Hypotek AB</td> <td data-bbox="892 486 1249 517">Nordea Bank Abp</td> <td data-bbox="1251 486 1422 517">2,50%</td> </tr> <tr> <td data-bbox="571 519 890 551"></td> <td data-bbox="892 519 1249 551"></td> <td data-bbox="1251 519 1422 551">%</td> </tr> <tr> <td data-bbox="571 553 890 584"></td> <td data-bbox="892 553 1249 584"></td> <td data-bbox="1251 553 1422 584">%</td> </tr> </tbody> </table> | Name of O-SII subsidiary             | Name of the EU parent of the O-SII subsidiary | Buffer applicable to O-SII EU parent | Nordea Hypotek AB | Nordea Bank Abp | 2,50% |  |  | % |  |  | % |
|--|---|--------------------------------------|---|--------------------------------------|-------------------|-----------------|-------|--|--|---|--|--|---|
| Name of O-SII subsidiary   | Name of the EU parent of the O-SII subsidiary   | Buffer applicable to O-SII EU parent |   |                                      |                   |                 |       |  |  |   |  |  |   |
| Nordea Hypotek AB  | Nordea Bank Abp   | 2,50%                                |   |                                      |                   |                 |       |  |  |   |  |  |   |
|  |   | %                                    |   |                                      |                   |                 |       |  |  |   |  |  |   |
|  |   | %                                    |   |                                      |                   |                 |       |  |  |   |  |  |   |
| <p><b>8. Miscellaneous</b></p>   |   |                                      |   |                                      |                   |                 |       |  |  |   |  |  |   |
| <p><b>8.1 Contact person(s)/mailbox at notifying authority</b></p>       | <p>Per Axelsson, Analyst, Bank Analysis and Policy<br/>+46 76 507 8148<br/>per.axelsson@fi.se</p>   |                                      |   |                                      |                   |                 |       |  |  |   |  |  |   |
| <p><b>8.2 Any other relevant information</b></p>                         |   |                                      |   |                                      |                   |                 |       |  |  |   |  |  |   |
| <p><b>8.3 Date of the notification</b></p>                               | <p>Please provide the date on which this notification was uploaded/sent.<br/>13/06/2024</p>   |                                      |   |                                      |                   |                 |       |  |  |   |  |  |   |