

Notification template for Articles 133 and 134(5) of the Capital Requirements Directives (CRD) – Systemic risk buffer (SyRB)

Template for notifying the European Central Bank (ECB) and European Systemic Risk Board (ESRB) of the setting or resetting of one or more systemic risk buffer rates pursuant to Article 133(9) CRD and to request that the ESRB issue a recommendation to other Member States to reciprocate the measure under Article 134(5) 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 the notification to the European Commission, the European Banking Authority (EBA) and the competent and designated authorities of the Member States concerned without delay. 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 and scope of the notification	
1.1 Name of the notifying authority	Czech National Bank (the CNB)
1.2 Country of the notifying authority	Czech Republic.
1.3 Type of measure (also for reviews of existing measures)	<p>Which SyRB measure do you intend to implement?</p> <p><input checked="" type="checkbox"/> Activate a new SyRB</p> <p><input type="checkbox"/> Change the level of an existing SyRB</p> <p><input type="checkbox"/> Change the scope of an existing SyRB (incl. changes to a subset of institutions or exposures)</p> <p><input type="checkbox"/> De-activate an existing SyRB</p> <p><input type="checkbox"/> Reset an existing SyRB (review)</p>

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authority, it may be agreed with the Head of the ESRB Secretariat that this notification, or a part thereof, should not be published for reasons of confidentiality or financial stability.

2. Description of the measure

2.1 Institutions covered by the intended SyRB

Please indicate whether the SyRB applies to:

- All institutions authorised in the Member State
- One or more subsets of credit institutions in the sector (please provide the names and identifiers (Legal Entity Identifier (LEI) code) of institutions covered)

Name of institution	LEI code	Consolidation level

- A subsidiary whose parent is established in another Member State. (Please provide the names and identifiers (LEI code) of subsidiaries)

Name of subsidiary	Name of the parent	LEI code of the subsidiary
Československá obchodní banka, a.s.	KBC Group NV	Q5BP2UEQ48R75BOTCB92
Komerční banka, a.s.	Société Générale SA	IYKCAVNFR8QGF00HV840
Česká spořitelna, a.s.	Erste Group Bank AG	9KOGW2C2FCIOJQ7FF485
UniCredit Bank CZ and SK, a.s.	UniCredit S.p.A.	KR6LSKV3BTSJRD41IF75
Raiffeisenbank, a.s.	Raiffeisen Bank International AG	31570010000000004460

If the SyRB applies to a subset of institutions, please describe the criteria for selection of the relevant institutions.

2.2 Exposures covered by the SyRB (Article 133(5) CRD)

Please indicate the exposures to which the SyRB applies:

- (a) all exposures located in the Member State that is setting the buffer;
- (b) the following sectoral exposures located in the Member State that is setting the buffer:
- (i) all retail exposures to natural persons that are secured by residential property;
 - (ii) all exposures to legal persons that are secured by mortgages on commercial immovable property;
 - (iii) all exposures to legal persons excluding those specified in point (ii);
 - (iv) all exposures to natural persons excluding those specified in point (i);
- (c) subsets of any of the sectoral exposures identified in point (b). Please specify the subsets in Section 2.3;
- (d) all exposures located in other Member States;
- (e) exposures located in third countries.

<p>2.3 Subsets of sectoral exposures</p>	<p>Where the systemic risk buffer applies to subsets of any of the sectoral exposures identified (see point 2.2 (c)), please specify:</p> <ul style="list-style-type: none"> - The elements of the dimensions and subdimensions that were used to identify the subset(s) of sectoral exposures as laid down in the EBA Guidelines on the appropriate subsets of exposures in the application of SyRB: <table border="1" data-bbox="632 421 1461 703"> <thead> <tr> <th>Dimensions/subdimensions</th> <th>Elements</th> </tr> </thead> <tbody> <tr> <td>1. Type of debtor or counterparty sector</td> <td></td> </tr> <tr> <td><i>1.a Economic activity</i></td> <td></td> </tr> <tr> <td>2. Type of exposure</td> <td></td> </tr> <tr> <td><i>2.a Risk profile</i></td> <td></td> </tr> <tr> <td>3. Type of collateral</td> <td></td> </tr> <tr> <td><i>3.a Geographical area</i></td> <td></td> </tr> </tbody> </table> <ul style="list-style-type: none"> - Assessment conducted in accordance with Section 5 of the EBA Guidelines on the systemic relevance of the risks stemming from this subset, taking into account: <ul style="list-style-type: none"> (i) size (ii) riskiness (iii) interconnectedness. - Why it would not have been appropriate to set the systemic risk buffer at the level of a sector (as in point 2.2(b)) to cover the risk targeted? 	Dimensions/subdimensions	Elements	1. Type of debtor or counterparty sector		<i>1.a Economic activity</i>		2. Type of exposure		<i>2.a Risk profile</i>		3. Type of collateral		<i>3.a Geographical area</i>																					
Dimensions/subdimensions	Elements																																		
1. Type of debtor or counterparty sector																																			
<i>1.a Economic activity</i>																																			
2. Type of exposure																																			
<i>2.a Risk profile</i>																																			
3. Type of collateral																																			
<i>3.a Geographical area</i>																																			
<p>2.4 Exposures located in other Member States and in third countries</p>	<p>If the systemic risk buffer applies to exposures located in other Member States or third countries (see points 2.2(d) and (e)), please include the names of those countries.</p>																																		
<p>2.5 Buffer rate (Article 133(9)(e) CRD)</p>	<p>Specify the intended SyRB rate. If different buffer requirements apply to different exposures or subsets of exposures, please specify for each exposure indicated under 2.2.</p> <p>Please indicate any changes to the list in 2.1 of institutions concerned and in the buffer rates given in point 2.5 as compared to the last notification, and provide an explanation, if applicable.</p> <table border="1" data-bbox="632 1384 1477 1998"> <thead> <tr> <th rowspan="2">Exposures</th> <th colspan="2">New SyRB rate</th> <th colspan="2">Previous SyRB rate</th> </tr> <tr> <th>All institutions (SyRB rate)</th> <th>Set of institutions (range of SyRB rates)</th> <th>All institutions (SyRB rate)</th> <th>Set of institutions (range of SyRB rates)</th> </tr> </thead> <tbody> <tr> <td>(a) All exposures located in the Member State that is setting the buffer</td> <td>0.5%</td> <td>% - %</td> <td></td> <td></td> </tr> <tr> <td>(b) <i>The following sectoral exposures located in the Member State that is setting the buffer:</i></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>(i) All retail exposures to natural persons that are secured by residential property</td> <td>%</td> <td>% - %</td> <td></td> <td></td> </tr> <tr> <td>(ii) All exposures to legal persons that are secured by mortgages on commercial immovable property</td> <td>%</td> <td>% - %</td> <td></td> <td></td> </tr> <tr> <td>(iii) All exposures to legal persons excluding those specified in point (ii)</td> <td>%</td> <td>% - %</td> <td></td> <td></td> </tr> </tbody> </table>	Exposures	New SyRB rate		Previous SyRB rate		All institutions (SyRB rate)	Set of institutions (range of SyRB rates)	All institutions (SyRB rate)	Set of institutions (range of SyRB rates)	(a) All exposures located in the Member State that is setting the buffer	0.5%	% - %			(b) <i>The following sectoral exposures located in the Member State that is setting the buffer:</i>					(i) All retail exposures to natural persons that are secured by residential property	%	% - %			(ii) All exposures to legal persons that are secured by mortgages on commercial immovable property	%	% - %			(iii) All exposures to legal persons excluding those specified in point (ii)	%	% - %		
Exposures	New SyRB rate		Previous SyRB rate																																
	All institutions (SyRB rate)	Set of institutions (range of SyRB rates)	All institutions (SyRB rate)	Set of institutions (range of SyRB rates)																															
(a) All exposures located in the Member State that is setting the buffer	0.5%	% - %																																	
(b) <i>The following sectoral exposures located in the Member State that is setting the buffer:</i>																																			
(i) All retail exposures to natural persons that are secured by residential property	%	% - %																																	
(ii) All exposures to legal persons that are secured by mortgages on commercial immovable property	%	% - %																																	
(iii) All exposures to legal persons excluding those specified in point (ii)	%	% - %																																	

	(iv) All exposures to natural persons excluding those specified in point (i)	%	% - %																											
	(c) All exposures located in other Member States	%	% - %																											
	(e) Exposures located in third countries	%	% - %																											
	(f) <i>Subsets of any of the sectoral exposures identified in point (b):</i>																													
	(i) Please specify the subset [Dimension/subdimensions]	%	% - %																											
	<p>If different buffer requirements apply to different subsets of institutions, please specify for each institution mentioned under 2.1.</p> <table border="1"> <thead> <tr> <th colspan="5">Set of institutions</th> </tr> <tr> <th>Exposures</th> <th>Name of institution</th> <th>LEI code</th> <th>New SyRB rate</th> <th>Previous SyRB rate</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td>%</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td>%</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td>%</td> <td></td> </tr> </tbody> </table>					Set of institutions					Exposures	Name of institution	LEI code	New SyRB rate	Previous SyRB rate				%					%					%	
Set of institutions																														
Exposures	Name of institution	LEI code	New SyRB rate	Previous SyRB rate																										
			%																											
			%																											
			%																											
3. Timing for the measure																														
3.1 Timing for the decision	06/06/2024																													
3.2 Timing for publication	01/08/2024																													
3.3 Disclosure	<p>Information about the strategy for communicating the notified measure to the market.</p> <p>Do you also intend to publish the justification for the SyRB? If not, why do you consider that publication could jeopardise the stability of the financial system?</p> <p>All information on decisions regarding SyRB is available on the CNB's website and in the Financial Stability Report – Spring 2024 (published on June 2024). These sources include risk assessments and decision justifications. A related legal act (provision of a general nature) will be published on August 1, 2024, and will include similar arguments as published in the FSR.</p>																													
3.4 Timing for application	01/01/2025																													
3.5 Phasing in	No phase-in																													
3.6 Review/deactivation of the measure	<p>Until when will the measure presumably be in place? What are the conditions for its deactivation? On what indicators would the decision be based? Please specify whether you intend to review the measure before the maximum period of two years foreseen in Article 133(8)(b) CRD.</p> <p>The CNB assesses structural risks on an annual basis and communicates it as such.</p> <p>The conditions for a change in the setting or deactivation of the SyRB are twofold: (a) a change in the key risk factors relevant to the setting of the SyRB or a change in the intensity of those factors, both of which are largely related to the evolution of the indicators used (see Section 4.3); and (b) a decline in the</p>																													

	<p>size of structural risks, which are mainly related to the occurrence of systemic losses. The losses will be reflected in a reduction in capitalisation. In addition to the absolute decrease in banks' capital, the decrease in the capital ratio is interpreted as a decline in capitalisation. A decline in the capital ratio causes banks' capital capacity for lending to a sound part of the real economy to fall. This is undesirable from an economic policy point of view, especially in a recessionary phase of the business cycle, as it may also give rise to a long-term shortfall in the supply of credit for viable projects.</p>
--	--

4. Reasons for the notified SyRB	
---	--

<p>4.1 Description of the macroprudential or systemic risk in your Member State (Article 133(9)(a) of the CRD)</p>	<p>Where applicable, please classify the risks targeted by the notified SyRB under the following categories:</p> <ul style="list-style-type: none"> (i) risks stemming from the structural characteristics of the banking sector <ul style="list-style-type: none"> - Size and concentration of banks - Ownership structure - Other structural risks (ii) risks stemming from the propagation and amplification of shocks within the financial system <ul style="list-style-type: none"> - Exposure concentration/asset commonality - Commonality in bank business models - Financial interconnections and contagion (iii) risks to the banking system stemming from either the real economy or specific sectors <ul style="list-style-type: none"> - Economic openness - Sectoral risks from the private non-financial sector, households and the public sector (iv) Other risks <p>Please specify:</p> <ul style="list-style-type: none"> - Whether these risks are widespread across the whole financial sector? <p>Or whether they are concentrated only in one or more subsets of the sector?</p> <p>From the proposed categories, the risks targeted mostly (but not exclusively, see more detail below) comprise of:</p> <ul style="list-style-type: none"> (iii) risks to the banking system stemming from either the real economy or specific sectors <ul style="list-style-type: none"> - Economic openness - Sectoral risks from the private non-financial sector, households and the public sector <p>while we assume these risks are widespread across the whole financial sector.</p> <p><i>More specifically:</i></p>
--	--

	<p>The CNB decided to set a general systemic risk buffer rate of 0.5% in response to the increasing relevance of systemic risks of a structural nature. According to the CNB's analyses, the domestic banking sector is to a large extent exposed to certain systemic risks of a structural nature, which are primarily related to the Czech economy's great openness, high foreign trade concentration and strong concentration of production and employment by economic activity. The potential costs associated with the transformation of the energy-intensive domestic economy to a climate-neutral one are also a significant contributor to systemic structural risk, as they may affect the competitiveness of domestic non-financial corporations. Growth in cyber risk may also increase the banking sector's vulnerability under certain conditions. All these risks stem mainly from the characteristics of the domestic real economy. They are being intensified by continued geopolitical tensions and growing uncertainty surrounding future economic developments abroad, especially in key trading partner countries.</p> <p><i>High openness</i> is a characteristic feature of the Czech economy and financial system. Imports and exports have a relatively large share in domestic economic output in international terms. This generally implies a greater sensitivity of domestic agents to foreign economic performance (for example, a negative demand shock) and to a wider range of changes and shocks (for example, negative supply shocks) to which the Czech economy and, directly or indirectly, the domestic banking sector could be exposed.</p> <p>The degree of <i>international trade diversification</i> is another major risk factor. Sales of domestic exporters (and suppliers of domestic importers) are regionally very concentrated, reducing the overall ability of the Czech economy to compensate for shocks to demand in one region (or to import prices and other import conditions) by switching to other territories. The import and export concentration of the Czech economy is also well above the European average, and has been relatively constantly so over time. The main counterparts for Czech exporters are Germany, Slovakia and Poland, with China joining the list in the case of importers.</p> <p><i>Economic concentration</i> may foster a downward spiral in the economic situation of firms and households. Manufacturing and wholesale and retail trade play a key role in the non-financial corporations sector in terms of both generating output and gross value added and creating jobs. These activities are not only sensitive to developments abroad, but are also key recipients of bank loans. However, the stress on the domestic banking sector may not be due primarily to the potential loss on exporters' bank loans, but rather to high economic concentration (in the sense of the share in output, value added and employment). Given a negative economic shock to foreign trade, this may foster a downward spiral of worsening corporate balance sheets and profitability, rising unemployment and falling aggregate domestic demand.</p> <p>The <i>energy intensity of domestic industry</i> is another relevant factor. Given its structure, the Czech economy is comparatively vulnerable to transition climate risks, especially in the form of rising prices of emission allowances and a stricter regulatory framework. In general, Czech industry is strongly energy-intensive and the use of fossil fuels in the energy sector is above the European average. Potentially elevated costs of firms related to the transition to a climate-neutral economy and to increased frequency of natural disasters (see section II.2, Box 1 in Financial Stability Report – Autumn 2023) may weaken the profitability of the corporate sector in the medium term and, in the event of adverse developments, may also represent an additional source of stress, even though these costs may not themselves trigger a systemic crisis.</p>
--	--

	<p><i>Cyber risks</i> are also on the rise in the Czech Republic. Cyber risk to financial stability is gaining in importance due to the persisting geopolitical risks and the increasing sophistication of cyber attacks. It is very difficult to precisely quantify the impacts of cyber risk, and for this and other reasons, cyber risk has not yet been addressed with other macroprudential instruments.</p> <p>When assessing structural risks, the CNB considers the probability of them materialising. The probability of the structural risks identified above materialising has gradually increased since the outbreak of the Covid pandemic, followed by the energy crisis and the relatively long period of high inflation. The CNB does not expect it to fall significantly against the current background of increased geopolitical tensions, persisting restrictive global financial conditions, and the ongoing process of deglobalisation and global decarbonisation. There are concerns about the future performance of the economy of our strongest trading partner, Germany. Given the persisting geopolitical tensions, it is impossible to ignore the increased probability of cyber attacks and their adverse consequences for the real economy and the financial sector. The technological change associated with the advent of AI and its potential impact on employment and the competitiveness of the economy is also an uncertainty over the medium term.</p>
<p>4.2 Reasons why the dimension of the macroprudential or systemic risks threatens the stability of the financial system in your Member State (Article 133(9)(b) CRD)</p>	<p>Reasons why the macroprudential or systemic risks threaten financial stability and justifying the systemic risk buffer rate.</p> <p>The structural risks (see section 4.1) have the potential to cause or exacerbate economic shocks, intensify the materialisation of cyclical risks, disrupt the ability of financial institutions to provide loans and other financial services, and trigger or exacerbate adverse economic developments.</p> <p>The adverse scenario with embedded large structural elements used by the CNB for the macro stress test of solvency showed that if the assumptions of such a scenario were to materialise, the CCyB would be fully exhausted and the need to use part of the CCoB would arise at the sectoral level. At the individual level, some banks would also breach the O-SII buffer. The threat of a breach of the CCoB and the O-SII buffer could lead to a contraction in credit with further adverse effects on the real economy and signals a greater need for capital buffers that can be released in the event of an economic shock.</p>
<p>4.3 Indicators used for activation of the measure</p>	<p>Provide the indicators triggering activation of the measure. When notifying the ECB, please provide the data on which the decision is based, if possible (preferably in an Excel file).</p> <p>To support the analysis and motivate the decision, the CNB uses variety of structural indicators to monitor macroprudential risks to the banking system and the economy. The indicators predominantly focus on long-term risks or structural characteristics of non-cyclical nature.</p> <p>Please see attachment for further information.</p>
<p>4.4 Effectiveness and proportionality of the measure (Article 133(9)(c) CRD)</p>	<p>Explanation why the draft measures are deemed likely to be effective and proportionate to mitigate the risk. E.g. how will the effectiveness of the measure be assessed? Based on which indicators? What are the expected transmission mechanisms?</p> <p>The SyRB aims to increase the resilience of the financial system in the Czech Republic and minimize the risk to financial stability in the medium- to long-term. The higher level of capital, especially if held due to requirement based on a</p>

	<p>releasable buffer than can be potentially adjusted or fully released in times of need, facilitates the supportive role of the banking sector in the maintaining credit supply during adverse periods. The decision reflects the CNB conservative capital policy relative to the particular structural systemic risks of the economic and banking sector.</p> <p>Effectiveness: The measure is effective with respect to its ability to strengthen resilience to relevant risks, while having a reasonable purpose in the wider macroprudential policy mix (see 5.1).</p> <p>Proportionality: Proportionality is ensured by calibrating the SyRB rate, which should enhance resilience to identified structural risks (section 5.1).</p>
<p>4.5 Reason why the systemic risk buffer is not duplicating the functioning of the O-SII buffer provided for in Article 131 CRD (Article 133(9)(f) CRD)</p>	<p>Where the systemic risk buffer rate applies to all exposures, please justify why the authority considers that the systemic risk buffer is not duplicating the functioning of the O-SII buffer provided for in Article 131 CRD.</p> <p>The O-SII mitigates risks associated solely with the systemic importance of institutions for the financial system and the real economy. The extent of risks addressed by SyRB is of a different nature (see 4.1), as the SyRB is set across all institutions regardless their importance.</p>
<p>5. Sufficiency, consistency and non-overlap of the policy response</p>	
<p>5.1 Sufficiency of the policy response</p>	<p>For a macroprudential policy to be 'sufficient', the policy responses must be deemed to significantly mitigate, or reduce the build-up of, risks over an appropriate time horizon with a limited unintended impact on the general economy.</p> <p>Note that the ESRB will use this assessment of the macroprudential stance as relevant input in assessing the sufficiency of the macroprudential policy in the Member States.</p> <p>Please provide any additional information that the ESRB should consider in assessing the sufficiency of the policy response.</p> <p>The SyRB is intended to strengthen resilience to risks of a longer-term structural nature, which are usually more difficult to quantify and require a high degree of expert judgement. In addition to expert judgement, the CNB's decision was based on the results of the stress test. The adverse scenario of the test involved a significantly adverse shock of a largely structural nature caused by a sudden and strong cooling in the economies, with which the Czechia is strongly linked through foreign trade. The substantial credit losses were mainly due to non-financial corporations. The resulting decline in the overall capital ratio to 14% signalled the need to fully release the CCyB and use 0.4 pp of the CCoB at the aggregate level. Three systemically important banks also needed to use the O-SII buffer, while two of them did not even meet the SREP capital requirement. The negative shocks tested did not include the additional impacts of the materialisation of climate and cyber risks, which caused the capital ratio to decline further. This was also indicated by a sensitivity analysis of the potential effects of cyber risk, which found a need for the additional use of 0.5 pp of the capital buffers, as the overall capital ratio fell to 13.5%.</p> <p>The adverse scenario did not work with the impact of significant uncertainty on the credit supply. As a result of uncertainty, some banks might not be willing to use some of their capital buffers where necessary to maintain their capital ratios.</p>

	<p>Instead, they might prefer to reduce their risk-weighted exposures by restricting the supply of loans to the real economy. An additional reduction in lending in the downward phase of the business cycle, especially as regards exposures with higher risk weights, would have an additional negative impact on macroeconomic conditions in excess of the scenario, exacerbating and prolonging the economic crisis.</p> <p>The systemic risk buffer will increase the resilience of the Czech banking sector. The increased resilience is estimated to be sufficient in supporting the stable functioning of the banking sector in the adverse scenario. Based on the results of stress tests and on expert judgement, a 0.5% systemic risk buffer is deemed to sufficiently bolster financial institutions' resilience to mitigate the risk described in section 4.1.</p>
<p>5.2 Consistency of application of the policy response</p>	<p>For a macroprudential policy to be 'consistent', the policy instruments must be deemed to meet their respective objectives as outlined in ESRB/2013/1³ and must be implemented in accordance with the common principles set out in the relevant legal texts.</p> <p>Note that the ESRB assessment of consistency will consider whether the same systemic risks are addressed in a similar way across and within the Member States over time.</p> <p>Please provide any additional information that the ESRB should consider in assessing the consistency of the policy response.</p> <p>The SyRB is intended to strengthen resilience to risks of a longer-term structural nature, which are primarily related to the Czech economy's great openness, high foreign trade concentration and strong concentration of production and employment by economic activity or related to climate and cyber risks. This is in line with the objectives of SyRB (referring also to the classification in 4.1)</p>
<p>5.3 Non-overlap of the policy response</p>	<p>For a policy instrument to be 'non-overlapping', it should aim to address a systemic risk that either differs to the risk addressed by other active tools in the same Member State, or to be complementary to another tool in that Member State which addresses the same systemic risk.</p> <ul style="list-style-type: none"> - Are other policy instruments used to address the <u>same</u> systemic risk? - If yes, please explain the need for more than one instrument to address the same systemic risk and how the different instruments interact with each other. <p>The CNB found that the structural risks identified above are not mitigated by other existing microprudential or macroprudential instruments. The CNB's decision on the SyRB rate takes into account the P2R. There are no overlaps in the case of macroprudential instruments, either. The CCyB mitigates systemic risk of a cyclical nature only. Structural risks, and in particular a combination of various types thereof, develop or manifest themselves independently of the position of the economy in the cycle. The materialisation of these risks is associated with higher credit losses than in the CNB's model-based estimates and projections, losses that may even exceed those considered in the calibration of the CCyB. The O-SII mitigates risks associated solely with the systemic importance of institutions for the financial system and the real economy, and the current LTV cap only limits the inflow of systemic risks arising from new mortgage loans into banks' balance sheets. Conversely, the general SyRB aims to mitigate the systemic risks associated with the characteristic features of the financial system and the real economy on the</p>

³ Recommendation of the European Systemic Risk Board of 4 April 2013 on intermediate objectives and instruments of macro-prudential policy (ESRB/2013/1) (OJ C 170, 15.6.2013, p. 1).

	<p>portfolio of the banking sector as a whole, regardless of the position of the economy in the financial cycle. Moreover, while the other measures are often based on quantitative techniques, and thus cover predominantly the risks that can be measured and calibrated based on historical experience, SyRB is intended to cover risks that are difficult to measure, either due to their nature or a limited historical experience with their materialization.</p>
6. Cross-border and cross-sector impact of the measure	
<p>6.1 Assessment of cross-border effects and the likely impact on the Internal Market</p> <p>(Article 133(9)(d) of the CRD and Recommendation ESRB/2015/2⁴)</p>	<p>Assessment of the cross-border effects of implementation of the measure.</p> <p>a. Assessment of the spillover channels operating via risk adjustment and regulatory arbitrage. The relevant indicators provided in Chapter 11 of the ESRB Handbook on Operationalising Macroprudential Policy in the Banking Sector⁵ and the Framework to assess cross-border spillover effects of macroprudential policies of the ECB Task Force on cross-border spillover effects of macroprudential measures can be used.</p> <p>b. Assessment of the:</p> <ul style="list-style-type: none"> ○ cross-border effects of implementation of the measure in your own jurisdiction (inward spillovers); ○ cross-border effects on other Member States and on the Single Market of the measure (outward spillovers); ○ overall impact on the Single Market of implementation of the measure. <p>The evaluation by the CNB implies that the probability of inward spill-overs emerging is limited. No leakages and regulatory arbitrage are expected within the Czech Republic.</p> <p>As the SyRB scope is limited to the domestic exposures, the cross-border effects of the implementation of the measure are not material. Since the banks affected by the measure are all predominantly domestic in terms of operating income and exposures, any possible cross-border effects are likely to be negligible.</p> <p>CNB does not expect the measure to have any negative consequences for the internal market. The overall impact of the measure on the EU internal market is positive. By applying the systemic risk buffer to Czech banks, the resilience of the Czech banking sector is improved, implying a more stable financial environment supporting the functioning of the internal market.</p>
<p>6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State</p>	<p>Referring to your Member State's specific characteristics, what is the scope for "leakages and regulatory arbitrage" in your own jurisdiction (i.e. circumvention of the measure/leakages to other parts of the financial sector)?</p> <p>Is there scope for "leakages and regulatory arbitrage" in other jurisdictions?</p>

⁴ 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).

⁵ Available on the ESRB's website at www.esrb.europa.eu.

	<p>CNB does not expect the measure to have any negative consequences for leakages and regulatory arbitrage.</p>
<p>6.3 Request for reciprocation by other Member States (Article 134(5) CRD and Recommendation ESRB/2015/2)</p>	<p>Does the authority intend to ask the ESRB to issue a recommendation to other Member States to reciprocate the measure in accordance with Article 134(5) CRD?</p> <p>Choose an item.</p> <ul style="list-style-type: none"> - If yes, please provide in Section 6.4. the justification for that reciprocity. - If no, what are the reasons for not requesting reciprocation? <p>No.</p> <p>The effectiveness of the SyRB is not expected to be limited by the significant share of foreign entities, or by the potential for foreign entities to enhance market share. (see section 6.1). Note that the share of domestic bank credit provided by the branches or cross-border operations is relatively small (5 %) and thus does not necessitates reciprocation. The relatively significant share of subsidiaries at the domestic bank credit market (81 %) does not limit the effectiveness of the SyRB from the domestic perspective, but it could be seen as a relevant reason to require reciprocation at the consolidated level (also in the view of the ongoing discussion on this issue). However, given the present legal uncertainty related to the approach to reciprocation at the consolidate level (as revealed during the ongoing discussion), and the possibly limited materiality of the activated measure (especially from the perspective of the capital requirement of the parent financial groups), given the SyRB rate set at 0,5 %, CNB does not consider the need for requesting the reciprocation as justified.</p>
<p>6.4 Justification for the request for reciprocation by other Member States (Article 134(5) CRD and Recommendation ESRB/2015/2)</p>	<p>To request reciprocation, please provide the following:</p> <ul style="list-style-type: none"> - a concise description of the measure to be reciprocated; - the financial stability considerations underlying the reciprocity request, including the reasons why the reciprocity of the activated measure is deemed necessary for its effectiveness; - the proposed materiality threshold and justification for that level. <p>If the ESRB deems the request for reciprocation to be justified, the description provided will form the basis for translation into all EU official languages for the purposes of an update of Recommendation ESRB/2015/2.</p>
<p>7. Combination of the SyRB with other buffers</p>	
<p>7.1 Combination with G-SII and/or O-SII buffers (Article 131(15) CRD)</p>	<p>Is the sum of the systemic risk buffer rate and the higher of the O-SII/G-SII buffer rates to which the same institution is subject above 5%?</p> <p>Please provide a list of the institutions subject to a G-SII or an O-SII buffer, indicating the G-SII or O-SII buffer and the sum of the G-SII/O-SII and SyRB buffers (a combined buffer rate of over 5% requires authorisation by the Commission).</p> <p>There is no institution in the Czech Republic subject to a G-SII buffer.</p> <p>The O-SII buffer is applied to 6 institutions in the range of 0.5% and 2.5%.</p> <p>For the institutions subject to an O-SII buffer, the sum of the systemic risk buffer rate and the O-SII buffer rate is not in any case above 5%.</p>

	Name of institution	G-SII/O-SII buffer rate	O-SII consolidation level	Sum of G-SII/O-SII and SyRB rates
	Československá obchodní banka	2.5%	Consolidated	3.0%
	Česká spořitelna	2.0%	Consolidated	2.5%
	Komerční banka	2.0%	Consolidated	2.0%
	UniCredit Bank Czech Republic and Slovakia	1.5%	Consolidated	2.0%
	Raiffeisenbank	0.5%	Consolidated	1.0%
	PPF Financial Holdings	0.5%	Subconsolidated	1.0%
		%		%

<p>7.2 Combination with other systemic risk buffers (Article 133(11) and (12) CRD)</p>	<p>Indicate all sets or subsets of exposures that would be subject to one or more systemic risk buffers with a combined systemic risk buffer rate in the ranges below:</p> <ul style="list-style-type: none"> - above 3% and up to 5% - above 5% <p>Indicate whether any subsidiaries of a parent in another EU Member State would be subject to a combined systemic risk buffer rate above 3%</p> <p>No set or subset of exposures is currently subject to more than one systemic risk buffer in the Czech Republic.</p>
---	---

8. Miscellaneous	
<p>8.1 Contact person(s)/mailbox at notifying authority</p>	<p>Adam Kučera, +420 224 412 957, adam.kucera@cnb.cz Lukáš Pfeifer, +420 224 412 638, lukas.pfeifer@cnb.cz</p> <p>Contact person(s) (name, phone number and e-mail address) and mailbox for further inquiries.</p>
<p>8.2 Any other relevant information</p>	
<p>8.3 Date of the notification</p>	<p>Please provide the date on which this notification was uploaded/sent.</p> <p>28/06/2024</p>