

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 when notifying the ECB (under Article 5 of the Single Supervisory Mechanism (SSM) Regulation¹);
- [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 measure².

E-mailing/uploading this template to the above addresses constitutes official notification; no further official letter is required. To facilitate the work of the notified authorities, please send the notification template in a format that allows the information to be read electronically.

1. Notifying national authority			
1.1 Name of the notifying authority	Komisja Nadzoru Finansowego (KNF)		
1.2 Country of the notifying authority	Poland		
2. Description of the measure			
2.1a Institution or group of institutions concerned	Based on data available as of 31 December 2022, 10 Polish legal entities were identified as O-SIIs. The names and LEI code of them are as following. The O-SII buffer is applicable at the highest level of consolidation.		
	Name of institution	LEI	Consolidation level
	Powszechna Kasa Oszczędności Bank Polski SA	P4GTT6GF1W40CVIMFR43	consolidated and individual level
	Bank Polska Kasa Opieki SA	5493000LKS7B3UTF7H35	consolidated and individual level
	mBank SA	259400DZXF7UJJK2AY35	consolidated and individual level
	Santander Bank Polska SA	259400LGXW3K0GDAG361	consolidated and individual level
	ING Bank Śląski SA	259400YLRTOBISHBVX41	consolidated and individual level

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.

	<table border="1"> <tr> <td>Bank Handlowy w Warszawie SA</td> <td>XLEZHWWOI4HFQDGL4793</td> <td>consolidated and individual level</td> </tr> <tr> <td>BNP Paribas Bank Polska SA</td> <td>NMH2KF074RKAGTH4CM63</td> <td>consolidated and individual level</td> </tr> <tr> <td>Bank Millennium SA</td> <td>2594000FDZ9KPZEO8K78</td> <td>consolidated and individual level</td> </tr> <tr> <td>Bank Polskiej Spółdzielczości SA</td> <td>BB3BGO3LCED63R8R9R41</td> <td>consolidated and individual level</td> </tr> <tr> <td>SGB-Bank SA</td> <td>259400P9KF07OP2K5P83</td> <td>individual level</td> </tr> </table>	Bank Handlowy w Warszawie SA	XLEZHWWOI4HFQDGL4793	consolidated and individual level	BNP Paribas Bank Polska SA	NMH2KF074RKAGTH4CM63	consolidated and individual level	Bank Millennium SA	2594000FDZ9KPZEO8K78	consolidated and individual level	Bank Polskiej Spółdzielczości SA	BB3BGO3LCED63R8R9R41	consolidated and individual level	SGB-Bank SA	259400P9KF07OP2K5P83	individual level																		
Bank Handlowy w Warszawie SA	XLEZHWWOI4HFQDGL4793	consolidated and individual level																																
BNP Paribas Bank Polska SA	NMH2KF074RKAGTH4CM63	consolidated and individual level																																
Bank Millennium SA	2594000FDZ9KPZEO8K78	consolidated and individual level																																
Bank Polskiej Spółdzielczości SA	BB3BGO3LCED63R8R9R41	consolidated and individual level																																
SGB-Bank SA	259400P9KF07OP2K5P83	individual level																																
2.1b Changes to the list of institutions concerned	Compared to the results of the previous evaluation carried out in 2022 on the basis of data for the financial year ended 31 December 2021, there are no changes in the above presented list.																																	
2.2 Level of the buffer applied	<p>At what level is the fully phased-in buffer (in %) applied to the institution(s)?</p> <table border="1"> <thead> <tr> <th>Name of institution</th> <th>New O-SII buffer</th> <th>Previous O-SII buffer</th> </tr> </thead> <tbody> <tr> <td>Powszechna Kasa Oszczędności Bank Polski SA</td> <td>2.00%</td> <td>2.00%</td> </tr> <tr> <td>Santander Bank Polska SA</td> <td>1.00%</td> <td>1.00%</td> </tr> <tr> <td>Bank Polska Kasa Opieki SA</td> <td>1.00%</td> <td>1.00%</td> </tr> <tr> <td>ING Bank Śląski SA</td> <td>0.50%</td> <td>0.50%</td> </tr> <tr> <td>mBank SA</td> <td>0.50%</td> <td>0.50%</td> </tr> <tr> <td>Bank Handlowy w Warszawie SA</td> <td>0.25%</td> <td>0.25%</td> </tr> <tr> <td>BNP Paribas Bank Polska SA</td> <td>0.25%</td> <td>0.25%</td> </tr> <tr> <td>Bank Millennium SA</td> <td>0.25%</td> <td>0.25%</td> </tr> <tr> <td>Bank Polskiej Spółdzielczości SA</td> <td>0.25%</td> <td>0.25%</td> </tr> <tr> <td>SGB-Bank SA</td> <td>0.25%</td> <td>0.25%</td> </tr> </tbody> </table>	Name of institution	New O-SII buffer	Previous O-SII buffer	Powszechna Kasa Oszczędności Bank Polski SA	2.00%	2.00%	Santander Bank Polska SA	1.00%	1.00%	Bank Polska Kasa Opieki SA	1.00%	1.00%	ING Bank Śląski SA	0.50%	0.50%	mBank SA	0.50%	0.50%	Bank Handlowy w Warszawie SA	0.25%	0.25%	BNP Paribas Bank Polska SA	0.25%	0.25%	Bank Millennium SA	0.25%	0.25%	Bank Polskiej Spółdzielczości SA	0.25%	0.25%	SGB-Bank SA	0.25%	0.25%
Name of institution	New O-SII buffer	Previous O-SII buffer																																
Powszechna Kasa Oszczędności Bank Polski SA	2.00%	2.00%																																
Santander Bank Polska SA	1.00%	1.00%																																
Bank Polska Kasa Opieki SA	1.00%	1.00%																																
ING Bank Śląski SA	0.50%	0.50%																																
mBank SA	0.50%	0.50%																																
Bank Handlowy w Warszawie SA	0.25%	0.25%																																
BNP Paribas Bank Polska SA	0.25%	0.25%																																
Bank Millennium SA	0.25%	0.25%																																
Bank Polskiej Spółdzielczości SA	0.25%	0.25%																																
SGB-Bank SA	0.25%	0.25%																																
2.3 Name of the ultimate EU parent institution	<p>Please provide the name and LEI code of the ultimate EU parent institution of the group for each of the O-SIIs identified. If the ultimate EU parent institution is not the concerned institution itself.</p> <table border="1"> <thead> <tr> <th>Name of identified O-SII</th> <th>Ultimate EU parent institution</th> <th>LEI of ultimate parent institution</th> </tr> </thead> <tbody> <tr> <td>mBank SA</td> <td>Commerzbank AG</td> <td>851WYGNLUQLFZBSYGB56</td> </tr> <tr> <td>Santander Bank Polska SA</td> <td>Banco Santander S.A.</td> <td>5493006QMFDDMYWIAM13</td> </tr> <tr> <td>ING Bank Śląski SA</td> <td>ING Bank N.V.</td> <td>3TK20IVIUJ8J3ZU0QE75</td> </tr> <tr> <td>BNP Paribas Bank Polska SA</td> <td>BNP Paribas</td> <td>R0MUWSFPU8MPRO8K5P83</td> </tr> <tr> <td>Bank Millennium SA</td> <td>Banco Comercial Português, S.,A.</td> <td>JU1U6S0DG9YLT7N8ZV32</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Name of identified O-SII	Ultimate EU parent institution	LEI of ultimate parent institution	mBank SA	Commerzbank AG	851WYGNLUQLFZBSYGB56	Santander Bank Polska SA	Banco Santander S.A.	5493006QMFDDMYWIAM13	ING Bank Śląski SA	ING Bank N.V.	3TK20IVIUJ8J3ZU0QE75	BNP Paribas Bank Polska SA	BNP Paribas	R0MUWSFPU8MPRO8K5P83	Bank Millennium SA	Banco Comercial Português, S.,A.	JU1U6S0DG9YLT7N8ZV32															
Name of identified O-SII	Ultimate EU parent institution	LEI of ultimate parent institution																																
mBank SA	Commerzbank AG	851WYGNLUQLFZBSYGB56																																
Santander Bank Polska SA	Banco Santander S.A.	5493006QMFDDMYWIAM13																																
ING Bank Śląski SA	ING Bank N.V.	3TK20IVIUJ8J3ZU0QE75																																
BNP Paribas Bank Polska SA	BNP Paribas	R0MUWSFPU8MPRO8K5P83																																
Bank Millennium SA	Banco Comercial Português, S.,A.	JU1U6S0DG9YLT7N8ZV32																																
2.4 Names of subsidiaries	<p>n.a.</p> <table border="1"> <thead> <tr> <th>Name of parent O-SII identified</th> <th>Name of O-SII subsidiary</th> <th>LEI of O-SII subsidiary</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></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																																

3. Timing for the measure																							
3.1 Timing for the decision	<p>What is the date of the official decision? <u>For SSM countries when notifying the ECB: provide the date on which the decision referred to in Article 5 of the Single Supervisory Mechanism Regulation (SSMR) will be taken.</u></p> <p>20/11/2023</p>																						
3.2 Timing for publication	<p>What is the date of publication of the notified measure?</p> <p>20/11/2023</p>																						
3.3 Disclosure	<p>The information has been disclosed on the KNF website as a briefing note.</p> <p>Link: https://www.knf.gov.pl/komunikacja/komunikaty?articleId=86897&p_id=18</p>																						
3.4 Timing for application	<p>What is the intended date of application of the measure?</p> <p>Immediate.</p> <p>The KNF identified O-SIIs and set the O-SII buffer for these institutions in October 2016, with the activation of the measures from 31 December 2016. In the subsequent years some new institutions were identified as O-SII and applied O-SII buffers, with immediate application of the measure. The measure is under the review and will continue to apply until next years' annual review.</p> <p>20/11/2023</p>																						
3.5 Phasing in	<p>Fully-loaded implementation</p> <table border="1"> <thead> <tr> <th>Name of institution</th> <th>Date1</th> <th>Date2</th> <th>Date3</th> <th>Date4</th> <th>Date5</th> </tr> </thead> <tbody> <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	Date1	Date2	Date3	Date4	Date5		%	%	%	%	%		%	%	%	%	%
Name of institution	Date1	Date2	Date3	Date4	Date5																		
	%	%	%	%	%																		
	%	%	%	%	%																		
3.6 Review of the measure	<p>On an annual basis.</p>																						
4. Reason for O-SII identification and activation of the O-SII buffer																							
4.1 Scores of institutions or group of institutions concerned, as per EBA guidelines on the assessment of O-SIIs (Article 131.3 CRD)	<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"> size; importance for the economy of the relevant Member State or the Union, capturing substitutability/financial institution infrastructure; complexity, including the additional complexities from cross-border activity; interconnectedness of the institution or (sub-)group with the financial system. <p>In stage 1 (referring to 4.3), the score of the identified O-SIIs is the following:</p> <table border="1"> <thead> <tr> <th>Stage 1</th> <th>Size</th> <th>Substitutability</th> <th>Complexity</th> <th>Interconnectedness</th> <th>Overall Score</th> </tr> </thead> <tbody> <tr> <td>Powszechna Kasa Oszczędności SA</td> <td>1889</td> <td>1642</td> <td>1754</td> <td>2127</td> <td>1853</td> </tr> </tbody> </table>					Stage 1	Size	Substitutability	Complexity	Interconnectedness	Overall Score	Powszechna Kasa Oszczędności SA	1889	1642	1754	2127	1853						
Stage 1	Size	Substitutability	Complexity	Interconnectedness	Overall Score																		
Powszechna Kasa Oszczędności SA	1889	1642	1754	2127	1853																		

Santander Bank Polska SA	1142	1020	1582	1637	1345
Bank Polska Kasa Opieki SA	1239	1246	1099	1763	1337
ING Bank Śląski SA	958	1083	1393	431	966
mBank SA	946	1041	658	953	899
Bank Handlowy w Warszawie SA	325	597	795	535	563
BNP Paribas Bank Polska SA	668	694	717	482	640
Bank Millennium SA	489	516	165	158	332
Bank Polskiej Spółdzielczości SA	118	88	11	105	80
SGB-Bank SA	118	39	56	75	72

In the stage 2 (referring to 4.3), the score of the identified O-SIIs is the following:

Stage 2	Size	Substitutability	Complexity	Interconnectedness	Overall Score
Powszechna Kasa Oszczędności SA	1889	1642	1812	2160	1875
Santander Bank Polska SA	1142	1020	1514	1483	1290
Bank Polska Kasa Opieki SA	1239	1246	967	1594	1262
ING Bank Śląski SA	958	1083	1170	596	952
mBank SA	946	1041	772	969	932
Bank Handlowy w Warszawie SA	325	597	946	431	563
BNP Paribas Bank Polska SA	668	694	673	478	628
Bank Millennium SA	489	516	252	279	384
Bank Polskiej Spółdzielczości SA	118	88	52	74	85
SGB-Bank SA	118	39	72	58	72

In the final stage, the overall score is the following:

Name of institution	Size	Substitutability	Complexity	Interconnectedness	Overall Score
Powszechna Kasa Oszczędności Bank Polski SA	1889	1642	1812	2160	1875
Santander Bank Polska SA	1142	1020	1582	1673	1345
Bank Polska Kasa Opieki SA	1239	1246	1099	1763	1337
ING Bank Śląski SA	958	1083	1393	431	966
mBank SA	946	1041	772	969	932
Bank Handlowy w Warszawie SA	325	597	946	431	563
BNP Paribas Bank Polska SA	668	694	717	482	640
Bank Millennium SA	489	516	252	279	384
Bank Polskiej Spółdzielczości SA	118	88	52	74	85

	SGB-Bank SA	118	39	72	58	72																																																																																											
4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)	<p>The KNF followed the EBA guidelines. All the obligatory criteria, indicators and weights have been applied. Where the data were not available at the highest consolidated level under the KNF jurisdiction, relevant proxies have been used. The threshold has been set at 350. All banks that are institutions under art. 4 (3) of the CRR have been included in the calculations and investment firms have been excluded.</p> <p>The full list of relevant authorities that have been included in the identification process and it is presented in line with the 3-stages approach (as in 4.3):</p>																																																																																																
	<table border="1"> <thead> <tr> <th>Bank</th> <th>I stage</th> <th>II stage</th> <th>Final score</th> </tr> </thead> <tbody> <tr> <td>Powszechna Kasa Oszczędności SA</td> <td>1853</td> <td>1875</td> <td>1875</td> </tr> <tr> <td>Bank Handlowy w Warszawie SA</td> <td>563</td> <td>563</td> <td>563</td> </tr> <tr> <td>ING Bank Śląski SA</td> <td>966</td> <td>952</td> <td>966</td> </tr> <tr> <td>Bank BPH SA</td> <td>116</td> <td>93</td> <td>116</td> </tr> <tr> <td>Santander Bank Polska SA</td> <td>1345</td> <td>1290</td> <td>1345</td> </tr> <tr> <td>mBank SA</td> <td>899</td> <td>932</td> <td>932</td> </tr> <tr> <td>Bank Millennium SA</td> <td>332</td> <td>384</td> <td>384</td> </tr> <tr> <td>Bank Polska Kasa Opieki SA</td> <td>1337</td> <td>1262</td> <td>1337</td> </tr> <tr> <td>Bank Pocztowy SA</td> <td>23</td> <td>33</td> <td>33</td> </tr> <tr> <td>Bank Ochrony Środowiska SA</td> <td>61</td> <td>76</td> <td>76</td> </tr> <tr> <td>SGB-Bank SA</td> <td>72</td> <td>72</td> <td>72</td> </tr> <tr> <td>Plus Bank SA</td> <td>2</td> <td>2</td> <td>2</td> </tr> <tr> <td>Nest Bank SA</td> <td>18</td> <td>24</td> <td>24</td> </tr> <tr> <td>Deutsche Bank Polska SA</td> <td>194</td> <td>194</td> <td>194</td> </tr> <tr> <td>Bank Polskiej Spółdzielczości SA</td> <td>80</td> <td>85</td> <td>85</td> </tr> <tr> <td>Credit Agricole Bank Polska SA</td> <td>113</td> <td>127</td> <td>127</td> </tr> <tr> <td>BNP Paribas Bank Polska SA</td> <td>640</td> <td>628</td> <td>640</td> </tr> <tr> <td>Toyota Bank Polska SA</td> <td>16</td> <td>17</td> <td>17</td> </tr> <tr> <td>DNB Bank Polska SA</td> <td>10</td> <td>12</td> <td>12</td> </tr> <tr> <td>Alior Bank SA</td> <td>272</td> <td>298</td> <td>298</td> </tr> <tr> <td>Bank Nowy SA</td> <td>4</td> <td>5</td> <td>5</td> </tr> <tr> <td>Velo Bank SA</td> <td>93</td> <td>119</td> <td>119</td> </tr> </tbody> </table>						Bank	I stage	II stage	Final score	Powszechna Kasa Oszczędności SA	1853	1875	1875	Bank Handlowy w Warszawie SA	563	563	563	ING Bank Śląski SA	966	952	966	Bank BPH SA	116	93	116	Santander Bank Polska SA	1345	1290	1345	mBank SA	899	932	932	Bank Millennium SA	332	384	384	Bank Polska Kasa Opieki SA	1337	1262	1337	Bank Pocztowy SA	23	33	33	Bank Ochrony Środowiska SA	61	76	76	SGB-Bank SA	72	72	72	Plus Bank SA	2	2	2	Nest Bank SA	18	24	24	Deutsche Bank Polska SA	194	194	194	Bank Polskiej Spółdzielczości SA	80	85	85	Credit Agricole Bank Polska SA	113	127	127	BNP Paribas Bank Polska SA	640	628	640	Toyota Bank Polska SA	16	17	17	DNB Bank Polska SA	10	12	12	Alior Bank SA	272	298	298	Bank Nowy SA	4	5	5	Velo Bank SA	93	119
Bank	I stage	II stage	Final score																																																																																														
Powszechna Kasa Oszczędności SA	1853	1875	1875																																																																																														
Bank Handlowy w Warszawie SA	563	563	563																																																																																														
ING Bank Śląski SA	966	952	966																																																																																														
Bank BPH SA	116	93	116																																																																																														
Santander Bank Polska SA	1345	1290	1345																																																																																														
mBank SA	899	932	932																																																																																														
Bank Millennium SA	332	384	384																																																																																														
Bank Polska Kasa Opieki SA	1337	1262	1337																																																																																														
Bank Pocztowy SA	23	33	33																																																																																														
Bank Ochrony Środowiska SA	61	76	76																																																																																														
SGB-Bank SA	72	72	72																																																																																														
Plus Bank SA	2	2	2																																																																																														
Nest Bank SA	18	24	24																																																																																														
Deutsche Bank Polska SA	194	194	194																																																																																														
Bank Polskiej Spółdzielczości SA	80	85	85																																																																																														
Credit Agricole Bank Polska SA	113	127	127																																																																																														
BNP Paribas Bank Polska SA	640	628	640																																																																																														
Toyota Bank Polska SA	16	17	17																																																																																														
DNB Bank Polska SA	10	12	12																																																																																														
Alior Bank SA	272	298	298																																																																																														
Bank Nowy SA	4	5	5																																																																																														
Velo Bank SA	93	119	119																																																																																														
4.3 Supervisory judgement	<p>The identification method consists of 3 stages:</p> <ol style="list-style-type: none"> 1. Calculation of scores basing on basic criteria and indicators as in EBA guidelines. Identification of the entities basing on the score. 2. Calculation of scores basing on enhanced criteria and indicators as in EBA guidelines. Identification of the entities basing on the score (Score calculated for all, but only non-OSII from the stage 1 are added to the O-SII group). <ol style="list-style-type: none"> a. The criterion "<i>Complexity/cross-border activity</i>" was enlarged with optional indicator "<i>Value of Trading & available for sale</i>" 																																																																																																

	<p><i>securities (taking into account highly liquid assets)</i>". The weights of all indicators within the criterion are equal.</p> <p>b. The criterion "<i>Interconnectedness</i>" was enlarged with optional indicator "<i>Deposits guaranteed under deposit guarantee system</i>". The weights of all indicators within the criterion are equal.</p> <p>3. An optional indicator "<i>Importance for an IPS of which the entity is a member</i>" was used to designate additional two institutions (Bank Polskiej Spółdzielczości SA and SGB-Bank SA) as O-SIIs.</p>																											
<p>4.4 Calibrating the O-SII buffer</p>	<p>The O-SII buffer was calibrated using a proportional method. For institutions identified as O-SII (in line with abovementioned stages), the buffer rate was calibrated as followed:</p> <table border="1" data-bbox="571 645 1302 1003"> <thead> <tr> <th>Number of basket</th> <th>Score range</th> <th>O-SII buffer rate</th> </tr> </thead> <tbody> <tr> <td>I</td> <td>(0-350)</td> <td>0.25%*</td> </tr> <tr> <td>II</td> <td><350-700)</td> <td>0.25%</td> </tr> <tr> <td>III</td> <td><700-1050)</td> <td>0.50%</td> </tr> <tr> <td>IV</td> <td><1050-1400)</td> <td>1.00%</td> </tr> <tr> <td>V</td> <td><1400-1750)</td> <td>1.50%</td> </tr> <tr> <td>VI</td> <td><1750-2100)</td> <td>2.00%</td> </tr> <tr> <td>VII</td> <td><2100-2450)</td> <td>2.50%</td> </tr> <tr> <td>VIII</td> <td><2450-10000)</td> <td>3.00%</td> </tr> </tbody> </table> <p>* Refers only to entities identified with an optional indicator "<i>Importance for an IPS of which the entity is a member</i>".</p> <p>The calibration is two stage:</p> <ol style="list-style-type: none"> 1. The entities are distributed on the baskets in line with the table above, basing on the score calculated according to point 1. in section 4.3. 2. The entities are moved on the baskets with higher O-SII buffer rates in line with the table above, basing on the score calculated according to point 2. in section 4.3. The change of basket is only upwards – the downward movements are excluded. 	Number of basket	Score range	O-SII buffer rate	I	(0-350)	0.25%*	II	<350-700)	0.25%	III	<700-1050)	0.50%	IV	<1050-1400)	1.00%	V	<1400-1750)	1.50%	VI	<1750-2100)	2.00%	VII	<2100-2450)	2.50%	VIII	<2450-10000)	3.00%
Number of basket	Score range	O-SII buffer rate																										
I	(0-350)	0.25%*																										
II	<350-700)	0.25%																										
III	<700-1050)	0.50%																										
IV	<1050-1400)	1.00%																										
V	<1400-1750)	1.50%																										
VI	<1750-2100)	2.00%																										
VII	<2100-2450)	2.50%																										
VIII	<2450-10000)	3.00%																										
<p>4.5 Effectiveness and proportionality of measure</p>	<p>Setting the O-SII buffer will have positive impact on the resilience of the bank to external shocks, as well as the soundness of the overall banking sector and the real economy in Poland. The applied measure is proportional with respect to the overall score of the given institution and the level of concentration in the Polish banking sector.</p>																											
<p>5. Sufficiency, consistency and non-overlap of the policy response</p>																												
<p>5.1 Sufficiency of the policy response</p>	<p>As the O-SII buffers provide an additional loss absorbing capacity, thus enhancing the resilience of the O-SIIs. Given the relevance of the ten O-SIIs to the domestic financial sector and their impact on systemic risk within the financial system, the calibrated – according to the domestic methodology – O-SII buffer rates of the identified entities are sufficient.</p>																											
<p>5.2 Consistency of application of the policy response</p>	<p>The O-SII buffers contribute to fulfilling objective 2(e) of ESRB 2013/1 to "Strengthen the resilience of financial infrastructures". The consistency of application of the policy response is realized by applying one methodology on all banks and by annual review. In line with the methodology, the buffer rates depend on the O-SII scores, which represent the relevance of the institutions and their impact on the financial sector.</p>																											

5.3 Non-overlap of the policy response	<p>There are no other macroprudential policy instruments used to address the structural risk represented by the size of the systemic banks.</p>																																								
6. Cross-border and cross-sector impact of the measure																																									
6.1 Assessment of cross-border effects and the likely impact on the Internal Market (Recommendation ESRB/2015/2³)	<p>The effects are negligible due to insignificant scale of cross-border activities of domestic banks.</p>																																								
6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State	<p>The research carried out so far shows no signs of such effects.</p>																																								
7. Combinations and interactions with other measures																																									
7.1 Combinations between G-SII and O-SII buffers (Article 131.14)	<p>n.a.</p> <table border="1" data-bbox="571 1128 1442 1281"> <thead> <tr> <th data-bbox="571 1128 927 1173">Name of institution</th> <th data-bbox="930 1128 1211 1173">O-SII buffer</th> <th data-bbox="1214 1128 1442 1173">G-SII buffer</th> </tr> </thead> <tbody> <tr> <td></td> <td style="text-align: center;">%</td> <td style="text-align: center;">%</td> </tr> <tr> <td></td> <td style="text-align: center;">%</td> <td style="text-align: center;">%</td> </tr> <tr> <td></td> <td style="text-align: center;">%</td> <td style="text-align: center;">%</td> </tr> </tbody> </table>	Name of institution	O-SII buffer	G-SII buffer		%	%		%	%		%	%																												
Name of institution	O-SII buffer	G-SII buffer																																							
	%	%																																							
	%	%																																							
	%	%																																							
7.2 Combinations with systemic risk buffers (SyRBs) (Article 131.15 CRD)	<p>Pursuant to the regulation of the Minister of Finance (Dz.U. [Journal of Laws] of 2020, item 473), the obligation to maintain the systemic risk buffer (SRB) was repealed as of 19 March 2020. The SRB at the rate of 3% – had been in force in Poland since 1 January 2018. The SRB applied for all domestically authorised credit institutions in Poland and covers all domestic exposures</p> <table border="1" data-bbox="571 1442 1422 1823"> <thead> <tr> <th data-bbox="571 1442 887 1487">Name of institution</th> <th data-bbox="890 1442 1094 1487">SyRB rate</th> <th data-bbox="1098 1442 1251 1532">SyRB application level</th> <th data-bbox="1254 1442 1422 1532">Sum of G-SII/O-SII and SyRB rates</th> </tr> </thead> <tbody> <tr><td></td><td style="text-align: center;">%</td><td></td><td style="text-align: center;">%</td></tr> <tr><td></td><td style="text-align: center;">%</td><td></td><td style="text-align: center;">%</td></tr> <tr><td></td><td style="text-align: center;">%</td><td></td><td style="text-align: center;">%</td></tr> <tr><td></td><td style="text-align: center;">%</td><td></td><td style="text-align: center;">%</td></tr> <tr><td></td><td style="text-align: center;">%</td><td></td><td style="text-align: center;">%</td></tr> <tr><td></td><td style="text-align: center;">%</td><td></td><td style="text-align: center;">%</td></tr> <tr><td></td><td style="text-align: center;">%</td><td></td><td style="text-align: center;">%</td></tr> <tr><td></td><td style="text-align: center;">%</td><td></td><td style="text-align: center;">%</td></tr> <tr><td></td><td style="text-align: center;">%</td><td></td><td 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		%		%		%		%		%		%		%		%		%		%		%		%		%		%		%		%		%		%
Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O-SII and SyRB rates																																						
	%		%																																						
	%		%																																						
	%		%																																						
	%		%																																						
	%		%																																						
	%		%																																						
	%		%																																						
	%		%																																						
	%		%																																						

³ Recommendation of the European Systemic Risk Board of 15 December 2015 on the assessment of cross-border effects of and voluntary reciprocity for macroprudential policy measures (ESRB/2015/3) (OJ C 97, 12.3.2016, p. 9).

7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)	<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>No.</p> <table border="1" data-bbox="571 315 1422 591"> <thead> <tr> <th data-bbox="571 315 890 405">Name of O-SII subsidiary</th> <th data-bbox="890 315 1251 405">Name of the EU parent of the O-SII subsidiary</th> <th data-bbox="1251 315 1422 405">Buffer applicable to O-SII EU parent</th> </tr> </thead> <tbody> <tr> <td data-bbox="571 405 890 439">mBank SA</td> <td data-bbox="890 405 1251 439">Commerzbank AG</td> <td data-bbox="1251 405 1422 439">1.25%</td> </tr> <tr> <td data-bbox="571 439 890 472">Santander Bank Polska SA</td> <td data-bbox="890 439 1251 472">Banco Santander S.A.</td> <td data-bbox="1251 439 1422 472">1.00%</td> </tr> <tr> <td data-bbox="571 472 890 506">ING Bank Śląski SA</td> <td data-bbox="890 472 1251 506">ING Bank N.V.</td> <td data-bbox="1251 472 1422 506">2.50%</td> </tr> <tr> <td data-bbox="571 506 890 539">BNP Paribas Bank Polska SA</td> <td data-bbox="890 506 1251 539">BNP Paribas</td> <td data-bbox="1251 506 1422 539">1.50%</td> </tr> <tr> <td data-bbox="571 539 890 591">Bank Millennium SA</td> <td data-bbox="890 539 1251 591">Banco Comercial Português, S.,A.</td> <td data-bbox="1251 539 1422 591">1.00%</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	mBank SA	Commerzbank AG	1.25%	Santander Bank Polska SA	Banco Santander S.A.	1.00%	ING Bank Śląski SA	ING Bank N.V.	2.50%	BNP Paribas Bank Polska SA	BNP Paribas	1.50%	Bank Millennium SA	Banco Comercial Português, S.,A.	1.00%
Name of O-SII subsidiary	Name of the EU parent of the O-SII subsidiary	Buffer applicable to O-SII EU parent																	
mBank SA	Commerzbank AG	1.25%																	
Santander Bank Polska SA	Banco Santander S.A.	1.00%																	
ING Bank Śląski SA	ING Bank N.V.	2.50%																	
BNP Paribas Bank Polska SA	BNP Paribas	1.50%																	
Bank Millennium SA	Banco Comercial Português, S.,A.	1.00%																	
8. Miscellaneous																			
8.1 Contact person(s)/mailbox at notifying authority	<p>Paweł Cywiński, pawel.cywinski@knf.gov.pl, (+48) 22 262 48 73</p> <p>Patryk Toporowski: patryk.toporowski@knf.gov.pl (+48) 22 262 51 76</p> <p>Monika Głuszko: monika.gluszko@knf.gov.pl (+48) 22 262 48 16</p>																		
8.2 Any other relevant information																			
8.3 Date of the notification	<p>Please provide the date on which this notification was uploaded/sent.</p> <p>22/11/2023</p>																		