

GOVERNOR

Pursuant to Article 43, paragraph (2), item (6) and Article 77a of the Act on the Croatian National Bank (Official Gazette 75/2008, 54/2013 and 47/2020), Article 4, paragraph (1), item (3) and Article 11, paragraph (2) of the Credit Institutions Act (Official Gazette 159/2013, 19/2015, 102/2015, 15/2018, 70/2019, 47/2020, 146/2020, 151/2022 and 145/2024) and Article 3, paragraph (1) of the Decision on the reciprocity of macroprudential policy measures adopted by relevant authorities of other European Union Member States and assessment of cross-border effects of macroprudential policy measures (Official Gazette 60/2017), the Governor of the Croatian National Bank hereby issues the

Decision

- I. It is hereby established that the recommended criteria for the reciprocation of the macroprudential policy measure adopted by the designated authority of Germany and recommended for reciprocation by the European Systemic Risk Board under Recommendation of 27 June 2025 amending Recommendation ESRB/2015/2 on the assessment of cross-border effects of and voluntary reciprocity for macroprudential policy measures (ESRB/2025/4) have not been met in the Republic of Croatia.
- II. The Croatian National Bank will not prescribe the reciprocation of the macroprudential policy measure referred to in item I.
- III. The Croatian National Bank shall monitor the level of exposure referred to in Recommendation of the European Systemic Risk Board of 27 June 2025 amending Recommendation ESRB/2015/2 on the assessment of cross-border effects of and voluntary reciprocity for macroprudential policy measures (ESRB/2025/4), and, in case a credit institution meeting the requirements set out in the macroprudential policy measure referred to in item I exceeds the

prescribed materiality threshold, shall prescribe the reciprocation of the measure referred to in item I.

Rationale

The Federal Financial Supervisory Authority of Germany (BaFin) has adopted a measure in accordance with Article 133 of Directive 2013/36/EU, recalibrating the sectoral systemic risk buffer and reducing the existing sectoral systemic risk buffer rate from 2% to 1% for all exposures to natural and legal persons collateralised by residential immovable property located in Germany for which such collateral is considered to be relevant for the reduction of supervisory requirements for own funds. The measure has applied on a consolidated, sub-consolidated and individual basis since 1 May 2025.

At the request of the Federal Financial Supervisory Authority of Germany (BaFin), under Recommendation of 27 June 2025 amending Recommendation ESRB/2015/2 on the assessment of cross-border effects of and voluntary reciprocity for macroprudential policy measures (ESRB/2025/4), the European Systemic Risk Board has recommended that the relevant authorities of the member states reciprocate the measure in question.

The recommendation is complemented by a materiality threshold so that, based on the application of the *de minimis principle* by the relevant national authorities reciprocating the measure, credit institutions may be exempted from the sectoral systemic risk buffer requirement if their relevant sectoral exposures do not exceed 10 billion euro. The reciprocation is required if the threshold for a specific credit institution is exceeded.

Since according to available data there are no credit institutions in the Republic of Croatia with exposures that meet the criteria for the application of this measure, using the *de minimis principle* the Croatian National Bank will not prescribe the reciprocation of the macroprudential measure adopted by the designated authority of Germany.

The Croatian National Bank shall review the materiality of these exposures on an annual basis and, in case a domestic credit institution meeting the conditions fulfils the

preconditions prescribed by Recommendation ESRB/2025/4, shall prescribe the reciprocity of the measure.

No.: 467-091/12-25/BV

Zagreb, 18 December 2025

Croatian National Bank

Governor

Boris Vujčić