



NÁRODNÁ BANKA SLOVENSKA
EUROSYSTEM



QUARTERLY COMMENTARY ON MACROPRUDENTIAL POLICY

APRIL 2015

Contents

Foreword	3
1 Situation analysis by Národná banka Slovenska	5
2 Decisions in the area of macroprudential policy.....	7
Annexes	11

Foreword

Financial system stability is essential for a well-functioning economy. It encompasses many areas, ranging from the security of bank deposits and other similar products to the smooth-functioning of the lending market based on the responsible approach of financial institutions and their customers. The purpose of macroprudential policy is to contribute to financial stability, in particular by strengthening the financial sector's resilience during good times, when risks are typically still at an early stage. This purpose also entails preventing the build-up of systemic risks, so as to make the economy less vulnerable in crisis periods.

Macroprudential policy in Slovakia is implemented primarily by Národná banka Slovenska (NBS), with its formal obligation in this regard laid down in Act No 747/2004 Coll. on financial market supervision. In implementing this policy, NBS may use any of several tools (from mitigating a specific risk to increasing capital requirements across the board), and may apply them in different ways (from issuing risk warnings to laying down statutory obligations).¹ The European Central Bank (ECB) has the power to impose further, stricter macroprudential policy settings.

A key element of macroprudential policy implementation is the regular quarterly assessment of developments in the area of financial stability, and any ensuing decision of the NBS Bank Board to apply a specific instrument. The fulfilment of the core objective, i.e. the maintenance of financial stability, is assessed through the monitoring of five intermediate objectives:²

1. to mitigate and prevent excessive credit growth and leverage;
2. to mitigate and prevent excessive maturity mismatch and market illiquidity;
3. to limit direct and indirect exposure concentrations;
4. to limit the systemic impact of misaligned incentives with a view to reducing moral hazard;
5. to strengthen the resilience of financial infrastructures.

The **first intermediate objective** is to prevent excessive credit growth and leverage, which has been generally identified as a key driver of the financial and economic crisis. This is a particularly important objective in Slovakia, owing to the traditional nature of the financial market in this country. Most of the significant trends, as well as risks, in the domestic banking sector are related to the market in lending to households and enterprises. Looking at loans to the domestic economy as a share of total assets, the ratio in Slovakia is one of the highest of any country, with banks earning the bulk of their income from such lending.

The **second intermediate objective** relates to excessive maturity mismatch in the assets and liabilities of bank balance sheets. In other words, the maturity of banks' assets should not differ significantly from the maturity of their funding liabilities. Although the role of banks is to intermediate the funding of long-term assets (loans) with short-term liabilities (deposits), experience has shown that an excessive maturity mismatch between assets and liabilities makes the financial system more vulnerable and contributes to a build-up of economic and financial imbalances.

¹ Further details about these instruments can be found on the NBS website, at <http://www.nbs.sk/en/financial-market-supervision/macroprudential-policy>

² The intermediate objectives are set out in line with Recommendation No ESRB/2013/1 of the European Systemic Risk Board of 4 April 2013 on intermediate objectives and instruments of macro-prudential policy.

The **third intermediate objective** is to limit direct and indirect exposure concentrations. Direct concentration risk typically arises from significant exposures to, for example, households, general government, or certain sectors of the economy. Indirect exposures arise from the interconnectedness of financial and non-financial institutions. Elevated concentration is a long-standing structural feature of the domestic financial sector. This is largely attributable to the structure of the Slovak economy, which is heavily dependent on a small number of sectors, as well as to the concentration of bank's claims on and/or sources of funding from certain customers or groups of customers. Another significant feature of the Slovak banking sector is the high share of domestic government bonds in banks' balance sheets.

The **fourth intermediate objective** aims to limit the systemic risk arising from misaligned incentives of financial institutions and their customers. The primary aim here is to reduce the risk of moral hazard related to the presence of systemically important financial institutions. Whereas, in respect of the third intermediate objective, concentration risk is monitored for its potential impact on individual banks or the banking sector, in the case of systemically important institutions concentration is monitored owing to the large impact that potential default of such an institution would have on the financial sector and real economy. Moral hazard may also arise in relation to management remuneration at financial institutions or in the terms of cooperation with financial intermediaries.

The **fifth intermediate objective** is to strengthen the resilience of financial infrastructures. The most important elements of the financial infrastructure in Slovakia are the payment systems (TARGET2, SIPS), the Deposit Protection Fund, and securities settlement systems. Their reliable operation is crucial for the country's financial stability.

The Quarterly Commentary on Macroprudential Policy (QCMP) is structured according to these objectives, pursuant to Recommendation ESRB/2013/1. Its main part is a situation analysis (based on the indicators in the annex), which is a basis for NBS decision-making. This edition of the QCMP is based mostly on data as at 31 December 2014, although the qualitative assessment also takes account of information available until the submission date of the QCMP.

The document is divided into three parts. The first part contains a brief analysis of the most significant developments related to systemic risk which occurred during the quarter under review, broken down into sub-headings that correspond to the above-mentioned intermediate objectives. The second part, focusing on decisions taken in the area of macroprudential policy, includes not only decisions of NBS, but also decisions of the ECB. The third part comprises annexes that include: tables showing indicators used to monitor the intermediate objectives, and reference information for decisions on the countercyclical capital buffer rate.

1 Situation analysis by Národná banka Slovenska

1.1 Excessive credit growth and leverage

The credit market experienced heterogeneous trends during the last quarter of 2014, as retail lending increased sharply and corporate lending remained flat. The growth rate of the outstanding amount of all loans provided by domestic banks continued to fall short of pre-crisis levels.

The Cyclogram values (Chart 3) remained largely unchanged in the last quarter of 2014. Even though several input variables were at high levels (particularly in respect of retail lending), their effect on the overall indicator was cancelled out by developments in corporate lending (a decline in loans from both domestic banks and non-residents, and a subdued increase in the issuance of bonds), as well as by credit standards and average property prices.

Given the deleveraging in the corporate sector, the overall amount of credit did not appear excessive in relation to GDP. The negative credit-to-GDP gap widened in the fourth quarter under each of the methodologies used (Chart 1 and Chart 2).

1.2 Excessive maturity mismatch and market illiquidity

In the fourth quarter of 2014 the maturity mismatch between banks' assets and liabilities continued to reflect the impact of a strong growth trend in long-term loans to households. The mismatch did not, however, increase in comparison with the previous quarter, and the end of its widening trend was related to several factors. On the liability side, the most significant of these factors were the issuance of mortgage bonds with maturities of between two and five years and the increase in deposits from natural persons with maturities of between nine and 12 months. The mismatch in asset-liability maturities of up to one year was further moderated by long-term borrowing from the central bank and the placement of these funds on deposit in current accounts at the central bank.

Furthermore, the loan-to-deposit ratio fell moderately at the end of the year, owing to a decrease in loans to non-financial corporations (NFCs) and an increase in deposits from NFCs. The liquid asset ratio continued to decline in the last quarter of 2014, particularly in banks oriented to lending to households.

1.3 Concentration

Concentration risk remained largely unchanged during the fourth quarter of 2014, although moderate changes were observed in certain components.

The most significant trend in this regard was the banking sector's mounting exposure to Cyprus (especially to the corporate sector), while credit spreads on Cypriot sovereign debt remained at levels indicative of elevated risk. With the exception of this trend, however, the exposure of the Slovak financial sector to stressed countries is relatively low. This includes the sector's exposure to Greece (amounting to 0.75% of own funds), which in view of the quite marked increase in credit spreads on Greek debt during the fourth quarter of 2014, is positive for the stability of the Slovak sector.

The intra-group exposures of Slovak banks also increased moderately, both in gross terms (from 5.2% to 6.0% of total assets) and in net terms after deducting liabilities (from 1.6% to 2.5% of total assets).

On the other hand there continued to be a slight downward trend in the proportion of banks' portfolios taken up by Slovak government bonds, which constitute a relatively substantial concentration in the aggregate balance sheet of the Slovak banking sector.

1.4 Moral hazard

In comparison with the third quarter, no significant changes were observed in moral hazard indicators in the fourth quarter of 2014. In all areas under review, the concentration of the first three to five banks remains relatively high (Table 6), although the only historically high levels appear in the amount of total liabilities in the financial sector. It should be noted, however, that in the case of this indicator and the majority of indicators under review, no significant fluctuations occurred during the fourth quarter. The sole exception was the ratio of investment in domestic government bonds to the total amount of government bonds issued, which shows a long-running downward trend that continued in the last quarter of 2014.

1.5 Financial infrastructures and other risks

In the third and fourth quarters of 2014, banks paid contributions to the Deposit Protection Fund (DPF) at a level of 0.01% of the amount of deposits under guarantee. The level of contributions was reduced from the original 2% by a transitional provision effective from 1 August 2014. The proportion of guaranteed deposits covered by the DPF's funds was unchanged quarter-on-quarter, at around 0.60% as at December 2014. Banks were not required in the fourth quarter to pay the special levy on financial institutions, since the funds accumulated in the government financial assets account was more than €500 million as at July 2014. The result of exceeding this threshold was that the levy was reduced from 0.4% to 0.2% from the first quarter of 2015.

2 Decisions in the area of macroprudential policy

2.1 Decisions taken by NBS in the quarter under review

Having regard to developments in the principal indicators of excessive credit growth and leverage (Table 1) and in the Cyclogram (Chart 3), the Bank Board of Národná banka Slovenska decided to set the countercyclical capital buffer rate at 0%³.

2.2 The current setting of instruments by NBS

On 7 October 2014 the Bank Board of NBS approved Recommendation No 1/2014 of Národná banka Slovenska in the area of macroprudential policy on risks related to market developments in retail lending. The central bank issued the Recommendation in response to developments in the retail loan market, after having repeatedly drawn attention to several imbalances. The Recommendation introduces a number of principles and can be found on the NBS website⁴.

The currently applicable macroprudential policy instruments, covering mainly the area of capital requirements, are listed in Table 1.

2.3 Potential application of macroprudential instruments over the medium-term horizon

Introduction of capital buffers for systemically important banks

In the January 2015 QCMP Národná banka Slovenska indicated its intention to apply capital buffers for systemically important banks. These additional capital requirements for systemically important banks are due to be implemented from 1 January 2016, and are not expected to exceed 3%⁵.

Draft amendments to legislation in the area of housing loans

With regard to ongoing legislative amendments based on EU Directives, preparations are being made to integrate into primary or secondary Slovak law several parts of Recommendation No 1/2014 of Národná banka Slovenska in the area of macroprudential policy on risks related to market developments in retail lending. The key benefit of such a change will be to extend the regulatory framework to entities other than banks. The legislation in this area will bring greater certainty to all banks and non-bank entities about the equality of business conditions in the retail lending market.

Expected developments in the countercyclical capital buffer rate in the next quarter

The countercyclical capital buffer relates to all exposures. Hence, as a rule, the decision on the countercyclical capital buffer rate takes into account lending trends in all the main segments, in particular loans to non-financial corporations and loans to households. Current trends in the lending market are, however, heterogeneous, with loans to households growing strongly while loans to non-financial corporations remain flat. In the absence of any signs of a robust recovery in corporate lending, Národná banka Slovenska expects the current countercyclical capital buffer rate to be left unchanged at the next decision on its setting, due in July 2015.

³ <http://www.nbs.sk/en/financial-market-supervision/macroprudential-policy/macroprudential-policy-decisions>

⁴ <http://www.nbs.sk/en/financial-market-supervision/macroprudential-policy/current-status-of-macroprudential-instruments/current-setting-of-other-instruments-applicable-in-slovakia>

⁵ http://www.nbs.sk/_img/Documents/_Dohlad/Makropolitika/Quarterly_commentary_2015_January_EN.pdf

2.4 ECB decisions concerning the Slovak banking sector taken in the quarter under review

As at April 2015 the European Central Bank had not issued any decision in the area of macroprudential policy.

Table 1 Current setting of instruments applicable in Slovakia

Macroprudential instrument	Q3 2014	Q4 2014	Q1 2015	Q2 2015	Note
Macroprudential instruments applicable in Slovakia					
Capital conservation buffer (Article 33b of the Banking Act)	1.5%*	2.5%	2.5%	2.5%	
Countercyclical capital buffer rate (Article 33g of the Banking Act)		0%	0%	0%	
O-SII buffer (Article 33d of the Banking Act)					Due to be implemented from 1 January 2016
Systemic risk buffer (Article 33e of the Banking Act)					Due to be implemented from 1 January 2017
Risk-weight for exposures fully secured by mortgages for residential property (Article 124 of the CRR Regulation)	35%	35%	35%	35%	
Risk-weight for exposures fully secured by mortgages on commercial immovable property (Article 124 of the CRR Regulation)	50%	50%	50%	50%	Scheduled increase
Minimum exposure-weighted average LGD for all retail exposures secured by residential property and not benefiting from guarantees from central governments (Article 164 of the CRR Regulation)	10%	10%	10%	10%	
Minimum exposure-weighted average LGD for all retail exposures secured by commercial immovable property and not benefiting from guarantees from central governments (Article 164 of the CRR Regulation)	15%	15%	15%	15%	
Risk-weight for exposures fully secured by mortgages on commercial immovable property - other EU Member States (Article 124 of the CRR Regulation)	50%	50%	50%	50%	
Minimum exposure-weighted average LGD for all retail exposures secured by residential property and not benefiting from guarantees from central governments - other EU Member States (Article 164 of the CRR Regulation)	10%	10%	10%	10%	
Minimum exposure-weighted average LGD for all retail exposures secured by commercial immovable property and not benefiting from guarantees from central governments - other EU Member States (Article 164 of the CRR Regulation)	15%	15%	15%	15%	

* Rate applicable from 1 August 2014 to 30 September 2014.

Table 2 Current setting of instruments applicable to foreign exposures

Macroprudential instrument	Q3 2014	Q4 2014	Q1 2015	Q2 2015	Note
Macroprudential instruments applicable abroad					
Countercyclical capital buffer rate for Sweden (Article 33h of the Banking Act)	0%	0%	0%	0%	To be increased to 1.0% from 13 September 2015
Countercyclical capital buffer rate for other EU Member States (Article 33h of the Banking Act)	0%	0%	0%	0%	
Countercyclical capital buffer rate for Norway (Article 33h of the Banking Act)	0%	0%	0%	0%	To be increased to 1.0% from 1 July 2015
Countercyclical capital buffer rate for countries other than EU Member States (Article 33h and Article 33i of the Banking Act)	0%	0%	0%	0%	
Systemic risk buffer for other EU Member States (Article 33f of the Banking Act)	0%	0%	0%	0%	
Risk-weight for exposures fully secured by mortgages on residential property - other EU Member States (Article 124 of the CRR Regulation)	35%	35%	35%	35%	Ireland, Croatia, Malta: conditions to be tightened for application of the 35% risk weight
Risk-weight for exposures fully secured by mortgages on commercial immovable property – Sweden (Article 124 of the CRR Regulation)	100%	100%	100%	100%	
Risk-weight for exposures fully secured by mortgages on commercial immovable property - other EU Member States (Article 124 of the CRR Regulation)	50%	50%	50%	50%	Romania: scheduled increase to 100% and conditions to be tightened for application of the 50% risk weight. United Kingdom: conditions to be tightened for application of the 50% risk weight
Minimum exposure-weighted average LGD for all retail exposures secured by residential property and not benefiting from guarantees from central governments - other EU Member States (Article 164 of the CRR Regulation)	10%	10%	10%	10%	
Minimum exposure-weighted average LGD for all retail exposures secured by commercial immovable property and not benefiting from guarantees from central governments - other EU Member States (Article 164 of the CRR Regulation)	15%	15%	15%	15%	

Source: ESRB.

B) Countercyclical capital buffer

Deviation of the credit-to-GDP ratio from its long-term trend⁶

Chart 1 Credit-to-GDP

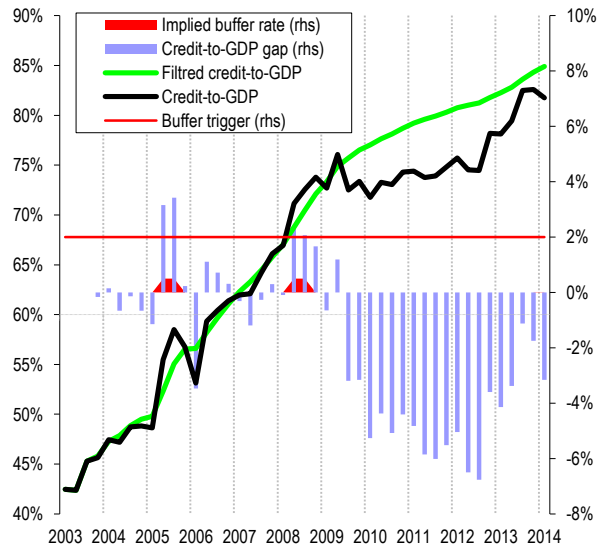
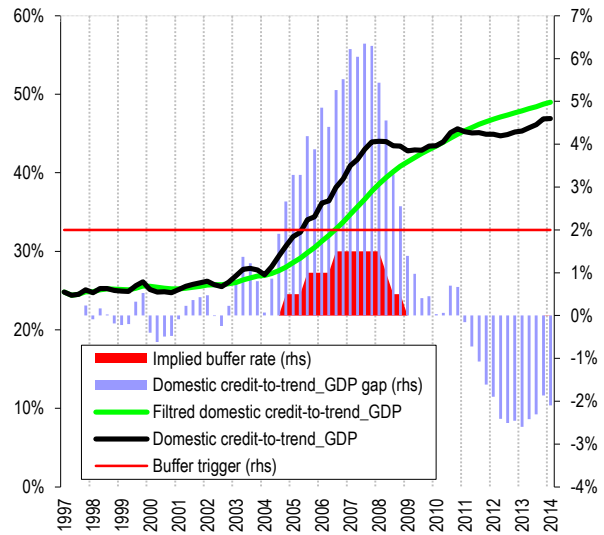


Chart 2 Domestic credit-to-trend_GDP



Countercyclical capital buffer trigger values and gap values are shown on the right-hand scale.

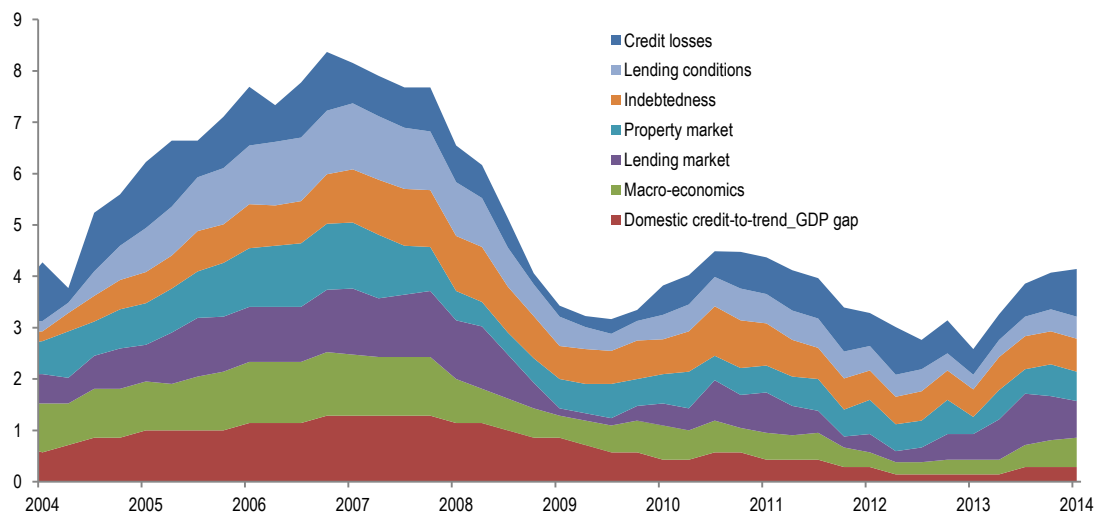
Source: NBS, SO SR.

Implied buffer rate is calculated according to the ESRB recommendation 2014/1

Buffer guide for the countercyclical capital buffer⁷

Buffer guide basis	Buffer guide as at 31 December 2014
Credit-to-GDP gap	0%
Domestic credit-to-trend GDP_gap	0%

Chart 3 Cyclogram⁸



Source: NBS, SO SR, CMN.

⁶ Ratio pursuant to Article 33g(2)(a) of the Banking Act.

⁷ Obligation laid down in Article 33g(2) of the Banking Act; calculation made in accordance with ESRB Recommendation No ESRB/2014/1 of 18 June 2014 on guidance for setting countercyclical buffer rates.

⁸ Pursuant to Article 33g(1c) of the Banking Act.