

1. Institutions whose O-SII score, calculated as the weighted average of the indicator-specific scores, is at least 3.5% are automatically designated as O-SIIs. The national macroprudential authority may adjust the threshold by ± 0.75 percentage points to take into account the specificities of the national credit institutions sector and the statistical distribution of the scores, thereby ensuring the homogeneity of the group of O-SIIs in terms of the O-SIIs' systemic importance.
2. Macroprudential authorities should assess whether institutions other than those identified in the first step should be designated as O-SIIs. The assessment should be based on the mandatory or optional indicators specified in the Annexes to the EBA Guidelines.

In designating O-SIIs, the FIN-FSA also applies the balance sheet total threshold of EUR 1 billion laid down in chapter 10, section 8 of the Act on Credit Institutions. However, credit institutions with an O-SII score not exceeding 0.045% in the first-step assessment are not designated as O-SIIs when exercising supervisory judgement in step two either.

Table 1. Criteria and indicators applied in the identification of O-SIIs⁴

Criteria	Indicators	Weight
Size	Balance sheet total (total assets)	25%
Importance/substitutability	Value of domestic payment transactions	8.33%
	Private sector deposits from depositors in the EU	8.33%
	Private sector loans to recipients in the EU	8.33%
Interconnectedness	Intra-financial system liabilities	8.33%
	Intra-financial system assets	8.33%
	Debt securities outstanding	8.33%
Complexity	Value of OTC derivatives (notional)	8.33%
	Cross-jurisdictional liabilities	8.33%
	Cross-jurisdictional claims	8.33%

⁴ In interpreting the calculations and indicators, the following factors should be taken into account:

- All the indicators are based on FINREP reporting data, except for the indicator of payment transactions, which is based on TARGET payment transactions data.
- The calculations do not include insurance business items.
- Private sector deposits from depositors in the EU: credit institutions whose foreign liabilities account for less than 10% of balance sheet liabilities do not report deposits from depositors in the EU separately. For these institutions, the figure includes all deposits.
- Private sector loans to recipients in the EU: credit institutions whose foreign claims account for less than 10% of balance sheet assets do not report loans to recipients in the EU separately. For these institutions, the figure includes all loans.
- Cross-jurisdictional claims and liabilities: the data only comprises credit institutions' items exceeding the threshold value of 10%.

The FIN-FSA has set the threshold for the weighted average of the indicator-specific scores of O-SIIs at 2.75%⁵. In recent years, there have been no changes in the structure of the Finnish banking sector that would warrant an adjustment of the threshold for systemic importance. Therefore, it remains justified to apply the 2.75% threshold score in the identification of O-SIIs.

Based on data as at end-2025, and as in previous years, Nordea Bank Abp, OP Pohjola and Municipality Finance Plc exceed the threshold for systemic importance (2.75%) and are therefore automatically designated as O-SIIs (Table 2). According to the FIN-FSA's assessment, there are no grounds for designating other credit institutions as O-SIIs.

Table 2. Finnish credit institutions' O-SII scores as at 31 December 2025

Banking group	O-SII score (%)	O-SII institution
Nordea	66.92	yes
OP Pohjola	10.71	yes
Municipality Finance	4.61	yes
Savings Bank Group	0.99	no
S-Bank	0.99	no
Aktia	0.82	no
Oma Savings Bank	0.51	no
Bank of Åland	0.48	no
Danske Mortgage Bank	0.48	no
POP Bank Group	0.45	no
The Mortgage Society of Finland	0.24	no
Alisa	0.02	no

Nordea remains decidedly the most significant credit institution by all O-SII criteria (Table 3). Nordea and OP Pohjola exceed the systemic importance threshold in terms of all four criteria, while Municipality Finance exceeds it in terms of the criteria 'Size' and 'Interconnectedness'.

Of all the domestic O-SIIs in 2025, the systemic importance of both Nordea and Municipality Finance increased again, whereas that of OP Pohjola decreased compared with the previous year (Chart 1).⁶ OP Pohjola's systemic importance declined in particular with regard to interconnectedness, mainly as a result of a contraction in debt securities outstanding. Its importance also decreased under the complexity criterion owing to a reduction in the volume of OTC derivatives. By contrast, Municipality Finance's systemic importance increased across all four criteria, with the strongest increase recorded for complexity. However, the increase in this indicator was largely attributable to reporting-related technical factors.⁷

⁵ Nordea Group drastically reduces the calculated relative importance of other Finnish credit institutions. To ensure that the systemic importance of O-SIIs is assessed in a consistent manner and that the group of O-SIIs remains homogeneous, the threshold for systemic importance was lowered from 3.5% to 2.75% in connection with the O-SII decisions taken in 2018.

⁶ OP Pohjola's systemic importance decreased by 0.13 percentage points, while that of Nordea and Municipality Finance increased by 0.70 and 0.48 percentage points, respectively.

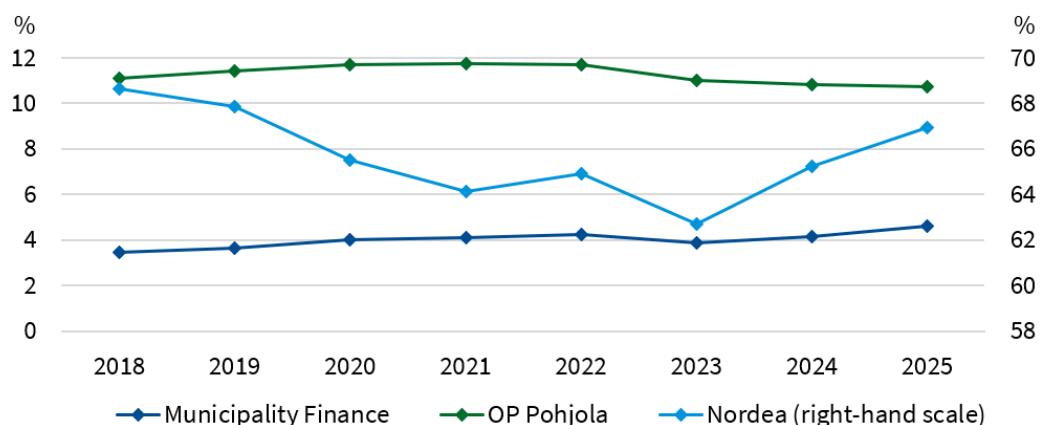
⁷ In calculating the score for complexity, data are drawn from reporting templates for which the reporting obligation is subject to separately defined threshold values. Depending on whether the thresholds are exceeded, the coverage of the data may vary across reference periods.

Table 3. Finnish credit institutions' O-SII scores by criterion (%) as at 31 December 2025

Banking group	Size	Importance	Complexity	Interconnectedness
Nordea	63.27	44.53	91.25	68.64
OP Pohjola	16.10	15.65	2.80	8.30
Municipality Finance	6.34	1.63	1.59	8.89
Savings Bank Group	1.51	1.59	0.12	0.73
S-Bank	1.51	1.88	0.08	0.47
Aktia	1.14	1.01	0.14	0.99
Oma Savings Bank	0.85	0.84	0.01	0.35
Bank of Åland	0.59	0.64	0.29	0.42
Danske Mortgage Bank	0.68	0.41	0.06	0.79
POP Bank Group	0.70	0.87	0.03	0.20
The Mortgage Society of Finland	0.42	0.30	0.01	0.26
Alisa	0.03	0.04	0.00	0.00

Nordea's O-SII scores increased the most among all the significant credit institutions located in Finland. The score rose under all four criteria except complexity, but the increase in Nordea's systemic importance is primarily explained by the increase recorded for interconnectedness. The higher score for interconnectedness is largely attributable to growth in intra-financial system liabilities and assets, which in turn is partly due to reporting-related technical factors. Nordea has retrospectively corrected the figures for interconnectedness.⁸ Nordea's balance sheet also grew the most among all credit institutions operating in Finland. The increase in Nordea's systemic importance was further supported by the simultaneous decline in the systemic importance of the branches of the largest foreign credit institutions operating in Finland.

Chart 1. Evolution of O-SII scores of Finnish O-SIIs, 2018–2025



Source: Financial Supervisory Authority.

⁸ The increase in Nordea's O-SII scores is partly explained by retrospective sector-classification corrections, and interconnectedness has not increased over the year as strongly as the change in the score might suggest.

3. Principles for setting capital buffer requirements for Finnish O-SIIs

Requirements of the Act on Credit Institutions and the minimum level of O-SII buffers

In addition to identifying O-SIIs, the Act on Credit Institutions requires the FIN-FSA to review the capital buffer requirements of O-SIIs (O-SII buffers) on an annual basis. If the review points to changes in O-SII buffers, the FIN-FSA is required to take a decision on the matter.

Under the Act on Credit Institutions, the FIN-FSA is required to categorise O-SIIs into seven categories (buckets) according to their assessed systemic importance (Table 4). As a rule, the O-SII buffer rate of credit institutions allocated to the lowest bucket (non-O-SIIs) is 0% of their total risk exposure amount. For credit institutions in the other buckets (O-SIIs), the buffer rates increase in increments of 0.5 percentage points so that, as a rule, the buffer rate of institutions allocated to the highest (seventh) bucket is 3%. O-SII buffers must be covered by Common Equity Tier 1 (CET1) capital.

Table 4. O-SII buckets under the Act on Credit Institutions and associated buffer rates

Bucket	Buffer rate
1	0.0%
2	0.5%
3	1.0%
4	1.5%
5	2.0%
6	2.5%
7	3.0%

Under the Act on Credit Institutions, the FIN-FSA is required to apply the following criteria when categorising O-SIIs and determining their buffer requirements:

1. the size of the credit institution measured by its total liabilities or balance sheet total or consolidated balance sheet total;
2. the liabilities of the credit institution and undertakings within its consolidated supervision to other credit institutions and receivables from other credit institutions as well as other direct linkages with the financial system;
3. the substitutability of the critical functions of the credit institution and undertakings within its consolidated supervision in the event of the undertaking losing its capacity to continue its operations;
4. the extent and significance of cross-border operations of the credit institution and undertakings within its consolidated supervision in Finland and in the European Economic Area.

In practice, the categorisation of Finnish O-SIIs and the calibration of O-SII buffers are based on the systemic importance of the O-SIIs, which is assessed primarily on the basis of the O-SII scores calculated in accordance with the EBA Guidelines. The calibration of O-SII buffers is also guided by the floor methodology⁹ of the European Central Bank (ECB).

⁹ ECB (2024) [Governing Council statement on macroprudential policies](#).

The ECB floor methodology establishes a minimum level for the O-SII buffer of an individual credit institution, determined on the basis of the institution's O-SII score. This minimum level serves as a benchmark for assessing, under Article 5 of the SSM regulation¹⁰, the capital requirements applied by national macroprudential authorities. Where a national macroprudential authority decides to apply an O-SII buffer below the minimum level implied by the floor methodology, the ECB may set a higher buffer requirement.

From 2025 onwards, the ECB floor methodology has taken into account, in addition to the O-SII's national systemic importance ('national perspective'), its systemic importance for the banking union as a whole ('banking union perspective'). This leads to a more consistent treatment of O-SIIs within the banking union and strengthens the resilience the banking system by reducing potential unwarranted heterogeneity in buffer levels between O-SIIs of similar systemic importance. Moreover, the revised floor methodology reduces the current disparity between capital requirements for domestic and cross-border activities within the banking union and can therefore remove barriers to cross-border corporate transactions and deepen the integration of the European banking markets.

Under the ECB's enhanced floor methodology, each bank identified as an O-SII obtains, in addition to a national score, a banking union score that is calculated in accordance with the EBA Guidelines and by using the consolidated banking sector of all Member States in the banking union as the reference banking system. The ECB ultimately ensures that, for each O-SII, the O-SII buffer does not fall below the minimum levels implied by the banking union perspective or the national perspective. When assessing the adequacy of national O-SII buffers, the ECB applies the higher of the two floor levels implied by these perspectives. The ECB's enhanced floor methodology took effect on 1 January 2025 and is capital neutral in 2025 and 2026.¹¹ After that, the banking union floor will be increased in two increments, and the new methodology will be fully phased in as of 1 January 2028.

Going forward, the ECB will publish the banking union scores of all O-SIIs on an annual basis, after all national authorities have completed their annual O-SII identification and buffer-setting process. According to the ECB's calculations, Nordea's O-SII score under the banking union perspective was 2.12% at the end of 2024.¹² For OP Pohjola and Municipality Finance, the corresponding score was 0.33 and 0.14, respectively. Thus, both credit institutions are allocated to the first bucket based on banking union level importance.

Based on the ECB's fully-phased in floor methodology, the minimum O-SII buffer requirement should be at least 1.5% for Nordea, 0.5% for OP Pohjola and 0.25% for Municipality Finance. However, as the Act on Credit Institutions requires O-SII buffer requirements to be set in increments of 0.5 percentage points, and as the application of an O-SII buffer rate of 0% would be contrary to the spirit of the regulatory framework and the ECB floor methodology, 0.5% can, in practice, be considered as the minimum O-SII buffer requirement for OP Pohjola and Municipality Finance.

¹⁰ Council Regulation (EU) No 1024/2013.

¹¹ In other words, the enhanced floor methodology that incorporates the banking union perspective does not, overall, lead to an increase in capital requirements at the initial stage of implementation in 2025 and 2026.

¹² [Other systemically important institutions: scores under the enhanced ECB floor methodology](#)

FIN-FSA's methodology for calibrating O-SII buffer requirements

The higher-than-average level of concentration of the Finnish banking sector and the large size of the most significant credit institutions relative to the national economy support the application of O-SII buffer rates above the minimum levels implied by the ECB's floor methodologies. The FIN-FSA assesses the level of O-SII buffers using two different versions of the bucketing approach in which O-SIIs are allocated to seven buckets based on their assessed systemic importance. In both approaches, systemic importance is measured by the O-SII score calculated in accordance with the EBA Guidelines. Under the first approach, which is based on a linear scale, the bucket ranges derived from O-SII scores are of equal width, reflecting the threshold score for systemic importance (2.75%).

Under the second approach, the bucket ranges are calibrated in accordance with the equal expected impact (EEI) approach. The EEI approach has been applied e.g. in calibrating buffer requirements for global systemically important institutions (G-SIIs).¹³ Under the EEI approach, the buffer requirements of systemically important institutions (SIIs) are calibrated so that the expected social costs from the default of an SII equal those from the default of a non-SII. Table 5 illustrates the bucket ranges under the two bucketing approaches and the indicative O-SII buffer rate applicable to each bucket.

Table 5. O-SII buckets and indicative buffer rates based on the linear scale and the EEI approach

Bucket	O-SII score (linear scale)	O-SII score (EEI-based scale)	Indicative O-SII buffer rate
1	0–2.75	0–2.75	0.0%
2	2.75–5.50	2.75–6.00	0.5%
3	5.50–8.25	6.00–10.00	1.0%
4	8.25–11.00	10.00–17.00	1.5%
5	11.00–13.75	17.00–28.00	2.0%
6	13.75–16.50	28.00–48.00	2.5%
7	16.50–	48.00–	3.0%

Table 6 illustrates the current O-SII buffer rates of Finnish O-SIIs, the recommended buffer rates under the two alternative bucketing approaches, and the minimum buffer rates implied by the ECB floor methodology. The present buffer requirements for OP Pohjola and Municipality Finance are in line with the recommended buffer rates under the prevailing calibration methodologies.

In the case of Nordea, the recommended buffer rate under the bucketing approaches suggest that Nordea's O-SII buffer could be raised to the regulatory maximum of 3.0% (bucket 7). Setting the highest possible buffer rate would be supported, for example, by the fact that Nordea is the most significant O-SII in the EU as measured by its O-SII score and relative to the national financial system.¹⁴ Moreover, Nordea's O-SII score has increased in the

See Federal Reserve (2015) [Calibrating the GSIB Surcharge](#).

¹⁴ See the [O-SII-scores](#) published on the EBA website. However, when comparing Nordic O-SIIs, it should be borne in mind that structural macroprudential buffer requirements (the O-SII buffer and the systemic risk buffer) are applied

past two years; however, the increase recoded last year is mainly explained by reporting-related technical factors. Nordea's O-SII score for 2025 is also lower than in 2018 and 2019. A decision not to set the maximum buffer rate would retain the incentive for the most significant credit institutions to avoid increasing their systemic importance.

Table 6. Indicative buffer rates for Finnish O-SIIs under the different methodologies

Banking group	Current O-SII buffer rate	Indicative O-SII buffer rate (linear scale)	Indicative O-SII buffer rate (EEI approach)	Minimum buffer level implied by the floor methodology¹⁵
Nordea	2.5%	3.0%	3.0%	1.5%
OP Pohjola	1.5%	1.5%	1.5%	0.5%
Municipality Finance	0.5%	0.5%	0.5%	0.5%

In addition to the indicative buffer rates implied by bucketing approaches, qualitative factors may be taken into account in the calibration of buffer requirements. For example, when calibrating the requirements for Finnish O-SIIs, the banking union's Single Supervisory Mechanism (SSM) and Single Resolution Mechanism (SRM) have been taken into account as a qualitative factor.¹⁶ It remains justified to take these risk-mitigating and internationally recognised factors into account as a qualitative consideration when calibrating O-SII buffer requirements, but caution is warranted in assessing their effects.

In Finland, the calibration of O-SII buffer rates and other macroprudential buffer requirements is also guided by assessments of the sufficient overall level of macroprudential buffer requirements in a neutral cyclical risk environment. Based on an overall assessment drawing on stress tests and other calculations of the FIN-FSA and the Bank of Finland, as well as the research literature, the sufficient overall level of macroprudential buffers is approximately 7% of risk-weighted assets.¹⁷ At the end of December 2025, the aggregate macroprudential buffers for the Finnish banking sector averaged 6.9%.

The EU Capital Requirements Directive and the Finnish Act on Credit Institutions recommend that institutions' systemic importance should be assessed not only from a national perspective but also from the perspective of the EU as a whole. Under Article 131(3) of the Capital Requirements Directive (2013/36/EU) and chapter 10, section 8 of the Act on Credit Institutions, the identification of O-SIIs and the calibration of O-SII buffer requirements should also take into account the institution's importance for the Union's economy and the extent and significance of its cross-border activities in the European Economic Area.

very differently across the Nordic countries. Consequently, comparisons of individual buffer requirements do not provide a comprehensive picture of the overall level of buffer requirements in the different Nordic countries.

¹⁵ Taking into account the floor level under both the national perspective and the banking union perspective. For Finnish O-SIIs, the floor level implied by the national perspective is higher than that implied by the banking union perspective.

¹⁶ O-SII buffers and single banking supervision primarily reduce the probability of failure of systemically important institutions, whereas resolution requirements and actions primarily reduce the societal costs of bank restructuring by ensuring the continuity of critical functions, mitigating the financial stability impacts of distress situations and protecting public funds.

¹⁷ See e. g. the [FIN-FSA Board decision of 26 June 2025](#).

Conclusions

On the basis of the O-SII scores at the end of 2025, and as in previous years, O-SIIs comprise Nordea Bank Abp, OP Pohjola and Municipality Finance Plc. Given the buffer requirements derived under the different calibration methodologies and the grounds set out above, it is justified to maintain the O-SII buffer rates of all three credit institutions at their current levels (Nordea 2.5%, OP Pohjola 1.5% and Municipality Finance 0.5%). There have been no material changes in the systemic importance of Finnish O-SIIs in recent years, and therefore there are no grounds for amending the buffer requirements.

Buffer requirements that are proportionate to systemic importance, together with the strong capital position of the banking sector, provide safety against losses caused by severe shocks in the economy or the financial system and improve the availability and terms of funding. Finnish banks also continue to hold ample capital in relation to requirements, and the banking sector's lending capacity has remained sound.

Table 7. O-SII buffer rates and buckets of Finnish O-SIIs

Banking group	O-SII buffer rate (current O-SII buffer rate)	O-SII bucket under the Act on Credit Institutions
Nordea	2.5% (2.5%)	6
OP Pohjola	1.5% (1.5%)	4
Municipality Finance	0.5% (0.5%)	2