DO BUFFER REQUIREMENTS FOR EUROPEAN SYSTEMICALLY IMPORTANT BANKS MAKE THEM LESS SYSTEMIC?

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Abstract

Buffers for systemically important institutions (SIIs) were designed to mitigate the risks posed by these large and complex banks. With a panel data model for a sample of listed European banks, we demonstrate that capital requirements for SIIs effectively reduce the perceived systemic risk of these institutions, which we proxy with the SRISK indicator in Brownlees and Engle (2017). We also study the impact of the adjustment mechanisms that banks use to comply with SII buffer requirements and their contribution to systemic risk. The results show that banks mainly respond to higher SII buffers by increasing their equity, as intended by the regulators. Once we control for the options SIIs employ to fulfil these requirements and SII characteristics (e.g. total asset size), we find a residual effect of having SII status. This result suggests that being an SII provides a positive signal to markets by further decreasing its contribution to systemic risk.

Keywords: capital requirements, systemically important institutions, systemic risk, SRISK, macroprudential policy.

JEL classification: C54, E58, G21, G32.

Resumen

Los colchones de capital para las entidades de importancia sistémica (EIS) fueron diseñados para mitigar los riesgos que suponen estos bancos grandes y complejos. Mediante un modelo de datos de panel para una muestra de bancos europeos que cotizan en bolsa se demuestra que los requerimientos de capital para las EIS logran reducir el riesgo sistémico percibido por los mercados en relación con estas instituciones, aproximado mediante el indicador SRISK de Brownlees y Engle (2017). También se analiza el impacto de los mecanismos de ajuste que utilizan los bancos para cumplir con estos requerimientos de capital para las EIS y su contribución al riesgo sistémico. Los resultados muestran que, ante un aumento de los colchones fijados para las EIS, los bancos responden principalmente mediante aumentos de su capital, en línea con el objetivo de los reguladores. Una vez introducidas en el modelo las diferentes opciones a disposición de las EIS para cumplir con estos requerimientos y ciertas características de las entidades (como, por ejemplo, el tamaño total de sus activos), se encuentra un efecto residual por el hecho de tener el estatus de EIS. Este resultado sugiere que ser designada como EIS proporciona una señal positiva a los mercados, que hace disminuir su contribución al riesgo sistémico.

Palabras clave: requerimientos de capital, entidades de importancia sistémica, riesgo sistémico, SRISK, política macroprudencial.

Códigos JEL: C54, E58, G21, G32.

1 Introduction

The global financial crisis (GFC) made systemic risk a central topic of research and policy. Systemic risk can be analysed either in its time/cyclical dimension or in its cross-sectional/structural dimension (see ESRB (2013)).¹ In this paper we focus on this second dimension of systemic risk, specifically on systemically important financial institutions (SIIs). The GFC evidenced that the failure of these large and complex banks could spill over into the whole financial sector and also harm the real economy. For this reason, these SIIs are considered to be "too big to fail" and engage in moral hazard behaviour (see Stern and Feldman (2004)), so that during boom periods these institutions could have incentives to take excessive risks as they expect to receive support during crisis episodes. These SII characteristics justify the adoption of specific policy measures.

To address this competitive advantage of SIIs and the associated risk that they create, the Basel Committee on Banking Supervision (BCBS) launched in 2011 its framework for dealing with systemically important banks with new additional capital requirements with a macroprudential focus (see BCBS (2011)).² The rationale behind these additional capital buffers for SIIs was precisely to account for the negative externalities stemming from their size and interconnectedness, as well as to increase their resilience and loss-absorbing capacity. Namely, there are two possible structural buffers to address SIIs' particularities. First, the capital requirements for Global Systemically Important institutions (G-SIIs), which are systemically relevant institutions at the global level.³ Second, the requirements for Other Systemically Important institutions (O-SII), which are institutions that are more likely to create risks to financial stability at the national level.⁴ In Europe, the region that constitutes the focus of our analysis, G-SIIs are also O-SIIs, and the higher of the two buffers is applied.⁵ Additionally, under the CRD IV, the Systemic Risk Buffer (SyRB) aims

¹Whereas the time dimension is related to the build-up of risks over time and the pro-cyclical accumulation of financial vulnerabilities, the structural dimension of systemic risk focuses on how a specific shock to the financial system can spread and become systemic (International Monetary Fund (2011)).

²The BCBS framework was implemented in the European Union (EU) with the transposition of Capital Requirements Directive IV (CRD IV), which entered into force in 2013.

³Since 2011 the Financial Stability Board (FSB) identifies the list of G-SIIs annually in consultation with the BCBS (see BCBS (2013)). The G-SII buffers were first activated in 2016.

⁴Since 2014, O-SIIs are annually selected in accordance with the European Banking Authority (EBA) guidelines (see EBA (2014)). These lists and corresponding buffers are revised annually by the national regulatory authorities and communicated to the European Systemic Risk Board (ESRB), and also submitted to and disclosed by the EBA. O-SII buffers became active in 2016.

⁵The criteria for identifying SIIs, both G-SIIs and O-SIIs, follow an indicator-based measurement approach that takes into account five dimensions of systemic importance, namely size, interconnectedness, substitutability, complexity and cross-jurisdictional activity.

to tackle systemic risks of a long-term structural and non-cyclical nature that are not covered by the CRD.⁶ Henceforth, we use the term "SII buffer" to refer to the buffer applicable to SIIs, which is a combination of the O-SII, G-SII and SyRB capital requirements, depending on the institution and country.⁷

Most of the previous literature on the effect of higher capital requirements focuses on their impact on credit supply. Moreover, these contributions analyse the impact of capital requirements in general, not the SII buffer in particular. These papers tend to conclude that under tighter capital requirements, banks reduce their risk-weighted assets and cut lending in the short run —see, for instance Aiyar, Calomiris and Wieladek (2014, 2016), Bridges et al. (2014), Gropp et al. (2019) and Mayordomo and Rodríguez-Moreno (2020), among others—. However, in the long-run capital buffers smooth credit supply cycles and have a positive effect on firm-level aggregate financing and performance (see Drehmann and Gambacorta (2012) and Jiménez et al. (2017)).

Previous studies that focus on the specific impact of SII capital buffers are even scarcer. For instance, there is some empirical evidence on the effect of the activation of SII buffers on lending — see Cappelletti et al. (2019, 2020)—.⁸ Additionally, a few studies analyse the impact of SII buffers on banks' solvency and, separately, on the financial markets response. For instance, Dautović (2020) concludes that an increase in SII buffers was associated with increases in both CET1 capital levels and the average risk-weights of the asset portfolio.⁹ Regarding the impact of SII announcements on financial markets, the empirical evidence suggests that higher capital requirements lead to lower stock prices and credit default swap (CDS) spread increases, although this market response is temporary —see Andrieş et al., (2020) and Gündüz (2020)—.

Although SII buffers were designed to address the systemic risk posed by these large and interconnected institutions, to date the effectiveness of this instrument at lowering their systemic risk

⁶See Article 133 of the CRD IV for further details. Unlike the G-SII and O-SII buffers, the SyRB is an EU instrument beyond the Basel III Framework. It aims to address the risks stemming from structural features that have the potential to amplify shocks and losses such as high indebtedness, interconnectedness or exposure to common shocks, among others. CRD IV sets out the rules to accumulate this buffer with the G-SII and O-SII buffer rates.

⁷The BCBS calls these two capital requirements the global systemically important bank (G-SIB) buffer and the domestic systemically important bank (D-SIB) buffer, instead of the EU denomination (i.e. G-SII for G-SIB and O-SII for D-SIB) —see BCBS (2012)—. In this paper we use the latter.

⁸Cappelletti et al. (2019) find that O-SIIs reduce lending to household and financial sectors in the short-term, while in the medium-term the effect is much smaller and heterogeneous. However, Cappelletti et al. (2020) suggest that OSIIs curtail lending to credit institutions the most, leaving loan supply to non-financial corporations (NFCs) almost unchanged.

⁹The findings in Dautović (2020) suggest that banks comply with the regulation by raising equity capital, but at the same time reallocate their portfolio towards riskier assets, thus the overall net effect on solvency is unclear.

is still an open question. As far as we know, only one empirical paper, Bostandzic et al. (2022), analyses the impact of higher capital requirements on systemic risk measures proxied by a combination of bank- and market-based indicators. However, this study does not specifically analyse SII buffers, but rather capital requirements in general, and concludes that one-off capital increases deteriorates a set of market-based measures of systemic risk. This effect is driven by a reduction in the market value of banks' equity.

This paper has a dual objective. First, we analyse whether higher capital buffers for SIIs reduce their contribution to systemic risk. For this purpose, we fit a panel data model for all listed European banks, be they SIIs or not. The dependent variable is an indicator that quantifies systemic risk, namely the SRISK indicator in Brownlees and Engle (2017). This metric can be easily computed with publicly available bank- and market-based data. Like other market-based measures, SRISK is available at high frequencies and can be calculated for listed institutions only.¹⁰

Second, we analyse the impact of the adjustment mechanisms that banks employ to comply with SII buffers on their contribution to systemic risk. Understanding which of these mechanisms dominates banks' behaviour towards increases in SII capital requirements is central to evaluating the implications of SII buffers. Broadly speaking, in response to higher capital requirements banks have four main options at their disposal (see Bank for International Settlements (2012), Cohen and Scatigna (2016) and Braouezec and Kiani (2021)). Namely, a bank can either (1) issue new equity; (2) increase its retained earnings; (3) run down its assets; or (4) reduce its risk-weighted assets. However, these alternatives have associated costs. For instance, new share issuance might be very costly for banks in the context of EU banks' historically low valuations, especially after the GFC. On the other hand, the retained earnings strategy would be more favourable from a regulator's perspective, but, as in the case of lowering dividends, it might take many years to increase the capital ratio. Also, if banks' response to the higher requirements is to run down their assets, lending to the real sector could be negatively affected (see Gropp et al. (2019)). Finally, shifting the composition of assets towards lower risk-weighted exposures could decrease expected profitability (see Bostandzic et al. (2022)).

According to our results, SII buffers do decrease European banks' contribution to systemic risk in the medium term. Furthermore, we find that this effect is partially driven by the increase in banks equity, and, contrary to Dautović (2020), we do not find evidence that banks take more

¹⁰Since the GFC, the literature on market-based measures to gauge systemic risk has grown. See Bisias et al. (2012) and Sylvain et al. (2016) for two surveys.

¹¹These four possible responses to higher requirements entail the assumption of a constant score, which is the indicator-based measurement that represents its systemic riskiness.

risks. From a financial stability perspective, this is an important implication that suggests that banks respond to SII buffers as intended. Finally, once we control for the adjustment mechanisms that banks use to comply with the SII buffer, the residual effect of having SII status on perceived systemic risk is still negative and significant. This outcome implies that being an SII provides a positive signal to markets by further decreasing their contribution to systemic risk.

The remainder of the paper is organised as follows. Section 2 describes how we quantify the contribution of a bank to systemic risk by means of the SRISK measure. Section 3 details our dataset. Section 4 then describes the empirical model to analyse the relationship between buffers and systemic risk and Section 5 summarises the main results. Finally, Section 6 contains our conclusions.

2 SRISK: A systemic risk indicator for banks

The concept of systemic risk is very complex to capture in a unique framework (see Hansen (2014)). In this paper we focus on market-based metrics of systemic distress that allow us to explore the systemic importance of individual banks. Since the GFC, the literature that analyses such metrics has significantly increased. Broadly speaking, these indicators can be classified into two groups. The first one consist of those metrics that are purely market based, such as the conditional autorregressive Value-at-Risk (VaR) in Engle and Manganelli (2004), and the Δ CoVaR in Adrian and Brunnermeier (2016), among others. The second set of indicators comprise those metrics that use balance sheet data in addition to market information, such as the marginal expected shortfall (MES) and the systemic expected shortfall (SES) in Acharya et al. (2017) and the SRISK in Brownlees and Engle (2017). We focus on this second type of metrics that associate systemic risk with the capital shortfall of the financial system conditional on the materialisation of a systemic event.¹²

More specifically, our dependent variable is systemic risk as proxied by the SRISK indicator in Brownlees and Engle (2017). SRISK is inspired by the systemic expected shortfall (SES) index in Acharya et al. (2017). Thus, SRISK associates the systemic risk contribution of an institution i with its expected capital shortfall conditional on a severe market downturn. The capital shortfall in t, CS_{it} , is the difference between the market value of equity and a prudential fraction k of the market value of the institution's assets, that is,

 $^{^{12}}$ While Δ CoVaR measures the VaR of the financial system conditional on an event affecting a specific bank, SRISK and MES are conditioned by a shock throughout the entire system. Accordingly, the direction of Δ CoVaR is from individual distress to the system, while MES and SRISK measure how much a given financial institution is undercapitalised when the whole financial system is undercapitalised.

$$CS_{it} = k(D_{it} + MV_{it}) - MV_{it}, \tag{1}$$

where D is the book value of total liabilities, MV is the market value of equity, and k is the prudential capital ratio, which is the percentage of total assets that the financial institution holds as reserves because of regulation or prudential management.¹³ Brownlees and Engle (2017) define SRISK as the conditional expectation of the future CS in the case of a systemic event, i.e. how much an institution's equity drops below a given fraction of its assets, when there is a crisis affecting the whole financial system, that is,

$$SRISK_{it} = E_t [CS_{i,t+h} \mid R_{m,t+1:t+h} < C],$$
 (2)

where $R_{m,t+1:t+h}$ represents the market return between t+1 and t+h, and C a threshold of market decline over time horizon h, defining a crisis, so that $R_{m,t+1:t+h} < C$ corresponds to the systemic event.

If we assume, like in Brownlees and Engle (2017), that the book value of the bank's liabilities remains fixed during the hypothetical systemic event, this expected capital shortfall can be expressed in terms of the firm equity return conditional on the systemic event, the long-run marginal expected shortfall (LRMES), that is,

$$SRISK_{it} = k(D_{it} + MV_{it}(1 - LRMES_{it})) - MV_{it}(1 - LRMES_{it}), \tag{3}$$

where LRMES denotes the expected drop in the equity value of an institution i when the market falls below a threshold C within time horizon h,

$$LRMES_{it} = -E_t \left[R_{i,t+1:t+h} \mid R_{m,t+1:t+h} < C \right], \tag{4}$$

where LRMES, as defined in (4) is non-observable. Following Brownlees and Engle (2017), we estimate LRMES with a dynamic conditional correlation (DCC) GARCH model (see Engle (2002, 2009)). For further details on the LRMES estimation, see Appendix A.

SRISK has at least four properties that makes this indicator an appropriate choice to measure systemic risk. First, it explicitly depends on the size and the degree of leverage of an institution. Second, SRISK can be easily computed with publicly available data. Third, as this indicator is also based on market data, it can be available at high frequencies, so that sudden shifts in systemic risk can be detected quickly. Finally, SRISK is a forward-looking measure as it signals the degree

 $^{^{13}}$ Brownlees and Engle (2017) call "quasi assets" the sum of book value of liabilities, D and market value of equity, MV.

of systemic risk that has not yet materialized, but such risk could lead to economic losses in the event of a severe financial market downturn. However, like other market-based measures, SRISK can only be calculated for listed institutions.¹⁴ Despite its limitations, SRISK is broadly used for empirical purposes by both policymakers and academics.¹⁵

3 Data and variables

To test the implications in terms of systemicity of the implementation of SII buffers, we analyse a panel data set of listed banks from 24 European countries. The dataset is quarterly and the sample period runs from 2008 Q1 to 2021 Q3.¹⁶ The inclusion of 2020 data in the sample poses sizeable challenges, given the sharp changes in a number of variables from the onset of the pandemic that considerably impact the estimates. Our approach to address this issue is to analyse the dataset for the complete sample and also for two sub-samples: the one that runs from 2008 Q1 to 2019 Q4 and the sub-sample that corresponds to the pandemic period, from 2020 Q1 to 2021 Q3. As the pandemic represents an exogenous shock independent of the financial cycle, focusing on the first sub-sample allows us to disentangle the effect of SII buffers in normal times. Specifically, the outbreak of COVID-19 led to an abrupt decrease in banks' market valuations which held SRISK at historically high levels in 2020 Q1, close to the levels during the 2012 European sovereign debt crisis and above the levels of the 2008-2009 global financial crisis.¹⁷ Also, the severity of the shock and the lack of alternative buffers led several countries to release the SII requirements in full or in part in 2020 Q2 as an immediate alternative available to ease the regulatory pressure on their credit institutions.¹⁸

Our total sample consists of 168 different banks. As Figure 1 shows, since 2008 Q1, when the number of banks was 82, this amount has gradually increased to reach a maximum of 158

¹⁴Another limitaion of SRISK is that it only reflects the markets' perception on an institution, so that this measure does not allow us to disentangle different risk factors (e.g. contagion, liquidity, solvency, funding, fire sales, etc.). That is, it is less informative than a fully fledged stress test.

¹⁵See, for instance, Tavolaro and Visnovsky (2014), Grinderslev and Kristiansen (2016), Coleman et al. (2018), Engle and Ruan (2019), Brownlees et al. (2020) or Bats and Houben (2020) for some empirical works based on the SRISK indicator.

¹⁶To minimise the data gaps, especially at the beginning of the sample period where only annual or half-yearly data are available for some banks, we linearly interpolate the missing data to proxy quarterly series.

¹⁷This increase in SRISK was the result of the higher uncertainty around the course of the pandemic that resulted in a sharp decline in stock market performance.

¹⁸Specifically, Estonia, Finland, Hungary, the Netherlands, and Poland fully or partially released their SII buffers in 2020 Q2. In addition, Cyprus, Greece, Lithuania, Malta and Portugal postponed the phasing-in of planned O-SII buffers increases by one year (see ESRB (2021)).

banks in 2020:Q1. Subsequently, our sample decreases to 127 banks in 2021 Q3.¹⁹ This sample is fairly representative and accounts for about 80% of total EU banks assets.²⁰ Our sample consists of all publicly traded European banks reported by Refinitiv Datastream. More specifically, we compare the group of 14 and 52 banks in our sample that have been classified as G-SIIs and O-SIIs, respectively, at any time, and a control group of 102 banks that have never become an SII.²¹ We assume that a bank's country is that of its primary listing where its stock is traded. Appendix B details the complete list of banks.

The dependent variable is the systemic risk of each bank as proxied by the SRISK indicator in Brownlees and Engle (2017), which we call SRISK, as shown in (3). To compute SRISK we exploit both balance sheet and market data. Regarding balance sheet data, we use total liabilities at consolidated level. Market data are also at consolidated level and consist of the market value (MV) of each bank and the STOXX Europe 600 stock market index. We chose this index as the market index required to calculate LRMES in (4), as shown in Appendix A. We assume that the parameters to compute SRISK in (4) are k=4.5% for the capital requirement, C=10 for the market decline threshold and h=22 business days for the period over which the hypothetical market decline occurs.²² We calculate SRISK for each listed bank with our own codes.²³ In line with Bostandzic et al. (2022), we do not restrict SRISK to being positive, that is, it allows us to capture both capital shortfalls and surpluses. Figure 1 depicts the mean SRISK throughout the sample. The average perceived systemic risk of banks as proxied by SRISK increased in 2008 with the GFC, in 2012, coinciding with the European sovereign debt crisis, and also at the beginning of 2020 with the onset of the pandemic.

Our main explanatory variable is the SII buffer rate applied to each systemic bank, that we denote as S_BUF . This variable allows us to disentangle whether SII requirements do influence on

¹⁹Not all the banks in the sample continue over the entire period, either because of failures or mergers and acquisitions. This fact explains the gap between the total number of different banks and its peak reached in one quarter.

²⁰This evidence is based on the total consolidated assets in 2020 (ECB Statistical Data Warehouse).

²¹Out of these 66 SIIs, 50 are always SIIs (either OSIIs or GSIIs) throughout the sample period, while 16 banks have changed their status at any time.

²²After several robustness tests, we assume k to be equal to the minimum Common Equity Tier 1 (CET1) ratio in accordance with the Basel III minimum own funds requirement (Pillar 1). In our specification, C and h have the same values as in Brownlees and Engle (2017), while they assume k = 5.5.

 $^{^{23}}$ Our Matlab codes to compute SRISK are available upon request. Alternatively, SRISK data could be directly obtained from the V-Lab institute (https://vlab.stern.nyu.edu). However, this source does not contain information about all individual listed banks in Europe and the use of our own codes allows us to better control for the parameters of the indicator.

the systemic importance of the bank. In the EU, SII buffer requirements are set at individual bank level. We obtain the SII buffer rates from the ESRB website.²⁴ To calculate S_-BUF we account for all the possible combinations to set the SII buffer at domestic level. Thus, this capital requirement is usually the higher of the G-SII buffer, the O-SII buffer and the SyRB, although there are some exceptions in certain jurisdictions.²⁵

We also analyse whether merely designating the bank as an SII creates a signalling effect of the implicit or explicit government guarantees in the event of distress, irrespective of the S_BUF level. For this, we define three dummy variables based on the assignement of the SII status by the competent authority —namely, the FSB for G-SIIs and the EBA for O-SIIs—.²⁶ The first one, SII_STAT , takes into account the fact of having SII status. It is a step variable that is one once the EBA or the FSB identifies the bank as an SII while the institution remains on the SII list. This variable allows us to analyse whether designation as an SII has an impact on the systemicity of the bank, regardless of the buffer level. That is, for bank i in period t we define SII_STAT as:

$$SII_STAT_{it} = \begin{cases} 1 & \text{if designated SII in} \quad t \\ 0 & \text{otherwise} \end{cases}$$
 (5)

The second dummy variable, SII_IN , is one only in the quarter when the bank becomes an SII, while the third one, SII_OUT , takes the value of one only when the institution loses SII status. Both SII_IN and SII_OUT allow us to quantify the immediate market reaction after the announcements themselves, which is in line with the empirical approach in Andrieş et al. (2020), Gündüz (2020) and Bekaert and Breckenfelder (2019) to analyse the market reaction to the disclosure of the list of O-SIIs by the EBA. Both binary variables are expressed as follows,

$$SII_IN_{it} = \begin{cases} 1 & \text{if} & SII_STAT_{it} = 1 \text{ and } SII_STAT_{it-1} = 0 \\ 0 & \text{otherwise,} \end{cases}$$
 (6)

 26 Our definitions are based on the dates when the SII status is effective. The first G-SII list took effect in January 2012, and since then it is updated annually. The EBA published the O-SII list for the first time on 25 April 2016. However, most competent authorities began to assign the O-SII status in late 2015 (some of them in 2014). In the computation of S_BUF we have checked all notifications that are available on the ESRB website prior to the first EBA list to account for such cases.

 $^{^{24}} For further details, see {\it https://www.esrb.europa.eu/national_policy/html/index.en.html}$

²⁵For instance, the O-SII buffer was not activated in Denmark or the Czech Republic until the end of 2019, while the SyRB was applied to SIIs in both countries before that date. In Bulgaria, Estonia and Slovakia, the SyRB is cumulative and the higher of the O-SII and G-SII buffers are set. Finally, in Bulgaria, Croatia, Estonia, Norway and Poland all banks —not just SIIs— are subject to the SyRB. For more details, see the annual notifications available on the EBA website, and the overview of national macroprudential and capital-based measures updated quarterly by the ESRB.

$$SII_OUT_{it} = \begin{cases} 1 & \text{if} & SII_STAT_{it} = 0 \text{ and } SII_STAT_{it-1} = 1 \\ 0 & \text{otherwise.} \end{cases}$$
 (7)

We also explore whether the different adjustment mechanisms to higher capital requirements impact SRISK once the SII buffer is implemented. Following Cohen and Scatigna (2016) and Braouezec and Kiani (2021), among others, we explore the impact on SRISK of four transmission channels, namely (1) total equity; (2) retained earnings; (3) new share issuances; and (4) the amount of risk-weighted assets.

To check whether SIIs and non-SIIs follow different patterns, Table 1 reports some summary statistics for SRISK, SII buffer level, S_BUF , as well as the four transmission channels for both SIIs and non-SIIs. We analyse the full sample and before and after the pandemic. As expected, the average SRISK is higher for SIIs than for non-SIIs in the entire sample period and the two sub-periods. Since the onset of the Covid-19 crisis, SIIs' average SRISK for the pandemic period is much higher than during the first sub-period, while for non-SIIs, this statistic decreased significantly. In other words, during the pandemic, SIIs would have been penalised in terms of systemicity, as measured by SRISK, given the drop in their stock prices and market valuations that pushed up the average SRISK from 2020 Q1. Regarding S_BUF , the buffer requirements for SIIs have remained relatively stable in the sample. Although the average S_BUF during the pandemic is higher than that of the first sub-sample, there have been several releases during this last period. Finally, as expected, total equity and equity issuances are, on average, greater for SIIs. Conversely, non-SIIs hold larger shares of risk-weighted assets.²⁷

Finally, for the robustness of our results, we also use a set of bank-specific and country-level variables as controls. Specifically, the bank variables consist of the total assets and the return on equity (RoE). Country-level variables allow us to control for the unobserved heterogeneity across countries and comprise (1) macroprudential buffers that are common at national level, namely the Countercyclical Capital buffer (CCyB),²⁸ the SyRB and the capital conservation buffer (CCoB);²⁹

²⁷This might be due to different management practices at SIIs, as well as the more intense use of internal models when calculating risk-weighted assets.

²⁸The total CCyB of a given bank is the average of the CCyB across all countries, weighted by its exposures of the bank in each country. Due to a lack of country-exposures data, we abstract from this complication and only control for the level of the CCyB in its primary listing country.

²⁹The adoption of the CCoB was completed in 2015 for the countries with phase-in arrangements, so that since 2015 the CCoB level is 2.5% in all jurisdictions. Although this control variable is constant since that date, we consider it given its different dynamics across countries during the phase-in period. The SyRB is non-zero for non-SIIs where this buffer is applied to all banks at the country-level.

(2) real GDP per capita; and (3) the sovereign CDS spread. See Table 2 for the complete list of variables and data sources.

4 Methodological approach

The baseline linear panel data model is built out of the following expression,

$$SRISK_{it} = \alpha_i + T_t + \gamma S BUF_{it-1} + \sum_j \beta_j X_{j,it-1} + \sum_k \delta_k Z_{k,it-1} + \varepsilon_{it},$$
 (8)

where for all banks i = 1, ..., N and period t = 1, ..., T, the main explanatory variable is S_BUF to quantify the effect of the introduction of SII capital buffers on a panel of listed banks. The key coefficient in (8) is γ , which can be interpreted as the average effect of a 1% increase in SII capital requirements on SRISK. Therefore, a negative estimate of γ would suggest that higher SII requirements would lead to a lower contribution to systemic risk as proxied by SRISK. Apart from the bank and time dummies, the model includes bank-specific control variables, X_{it} , and country-level variables, Z_{it} as described in the previous section. We fit the model for the full sample, and also for the two sub-samples to characterise the impact of the pandemic on the dataset.

Second, we also fit different specifications of the baseline model in (8), replacing S_BUF with the three alternative dummy variables based on the assignment of SII status defined in expressions (5) to (7). Namely, we use the step variable SII_STAT in (5) as an explanatory variable to study whether having SII status influences on the bank systemicity regardless of the SII capital requirement level. Thus, a negative estimate of this coefficient would suggest that being an SII lowers a bank's contribution to systemic risk as proxied by SRISK. In other words, being an SII might represent a signalling effect regardless of the buffer level. Further, we explore the possibility that there could be an immediate market response on the announcement of a bank's designation as an SII related to the market perception of its contribution to systemic risk. To this end, we also modify the baseline model in (8) by replacing S_BUF with SII_IN and SII_OUT , as defined in (6) and (7). A positive (negative) estimate of the SII_IN coefficient would indicate that the designation as an SII would immediately increase (decrease) the systemic nature of the bank.

We further study the effect of being identified as an SII over time via local projections (see Jordà (2005)). Thus, for quarters q = 0, 1, 2, ..., 12 we fit the baseline model that considers SII_IN as an explanatory variable instead of S_BUF as follows,

$$SRISK_{it+q} = \alpha_i^q + T_t^q + \lambda^q SII_IN_{it-1} + \sum_j \beta_j^q X_{j,it-1} + \sum_k \delta_k^q Z_{k,it-1} + \varepsilon_{it+q}.$$
 (9)

Next, we increase the number of drivers in (8) with the four main options that banks have at their disposal to comply with SII buffers. This specification allows us to disentangle which one dominates in a bank's response in terms of lower systemicity to higher capital requirements. Namely, we explore the impact of four alternative variables entailing changes to the capital structure on SRISK: (1) total equity; (2) retained earnings; (3) new share issuances; and (4) risk-weighted assets.

$$SRISK_{it} = \alpha_i + T_t + \gamma S BUF_{it-1} + \sum_{l=1}^{4} \omega_l C_{l,it-1} + \sum_j \beta_j X_{j,it-1} + \sum_k \delta_k Z_{k,it-1} + \varepsilon_{it}.$$
 (10)

Finally, we check whether decisions by SII banks to comply with capital requirements do have an impact on their systemicity. For this purpose, we also fit the model in (9) with interactions of the variables related to a bank's capital structure and SII_STAT, which is given by,

$$SRISK_{it} = \alpha_i + T_t + \gamma S BUF_{it-1} + \sum_{l=1}^{4} \omega_l C_{l,it-1} + \sum_{l=1}^{4} \lambda_l (C_{l,it-1} \times SII STAT_{it-1}) + \sum_{j} \beta_j X_{j,it-1} + \sum_{k} \delta_k Z_{k,it-1} + \varepsilon_{it}.$$

$$(11)$$

This last specification allows us to test for the null hypothesis that the influence of these variables on the systemicity is independent on the SII status. That is, for all the bank capital-related variables l it is possible to test for the following null,

$$H_0: \lambda_l = 0 \tag{12}$$

Model (11) also allows us to quantify the residual impact of S_BUF on SRISK once we control for capital-related variables. This residual impact of S_BUF could be interpreted as the effect of the SII buffer level itself on a bank's contribution to systemic risk. Finally, we replace S_BUF with SII_STAT in (11) to analyse the significance of having SII status once we also consider all the feasible bank choices to fulfil this capital requirement. This effect could be related to a positive sign for the markets of having SII buffers once we control for bank balance sheet variables.³⁰

We estimate this linear fixed effects panel data model with standard errors robust to serial correlation (clustered at bank level) and heteroscedasticity. Another challenge of the analysis is the possibility of endogeneity problems as a result of reverse causality and omitted variables. Reverse causality could be a concern when analysing the link between SRISK and S_BUF , as two-way

 $^{^{30}}$ Additionally, we have also explored whether the estimate of γ in (8) is different for banks of the European periphery countries. To this end, we have built an indicator variable that is equal to one if a bank's home country is Cyprus, Greece, Italy, Malta, Portugal or Spain, and zero otherwise. We have interacted this new variable with S_BUF in (8), as well as with SII_IN and SII_OUT . The estimates, which are available upon request, are not significant or conclusive.

causality relationship could be feasible. For instance, the national authorities could increase the SII buffer to address a bank's higher systemicity. On the other hand, higher capital requirements for SIIs are likely to influence a bank's systemic nature. This latter direction of causality is precisely the focus of our analysis, and to minimise the effect of the former the main variables of interest $-S_BUF$, SII_IN and SII_OUT — are lagged one period in specifications (8) to (11). Also, all explanatory variables are also lagged one period to limit simultaneity bias. Finally, regarding a possible omitted variable bias, we consider that our set of explanatory variables contains a sufficient number of relevant drivers to analyse of SRISK and, therefore, we consider that our model is not poorly specified.

5 Results

5.1 Baseline model: some initial results

Table 3 reports the estimates of the baseline model in (8) for the total sample (Panel A), as well as for the sub-sample before and after the onset of the Covid-19 pandemic (Panels B and C, respectively). First and most importantly, before the pandemic the increase in the SII buffer level has a negative effect on a bank's contribution to systemic risk, as signalled by the negative and significant estimate of S_-BUF . This evidence suggests that higher SII buffers are associated with lower systemic risk. Given that the main objective of SII buffers is to address the systemic riskiness of SIIs, this result means that these capital requirements work as expected over this sample period.³¹

Conversely, during the pandemic the estimate of S_BUF becomes non-significant. This lack of significance also holds for the full sample. The particular dynamics of S_BUF and SRISK during the pandemic explain this result. Thus, during the pandemic the estimate for S_BUF reflects the fact that the released buffers for SIIs in some countries (lower S_BUF) were followed by a reduction in the banks' contribution to systemic risk (lower SRISK) after its peak in 2020 Q1. Therefore, the negative link between the SII buffer level and a bank's contribution to systemic risk identified for the preceding sample does not hold during the pandemic. In fact, this link between S_BUF and SRISK is reversed in those countries that released their SII buffers, so that the lower S_BUF preceded SRISK drops. However, this temporal positive relationship between the two

 $^{^{31}}$ According to the estimated coefficient for S_BUF for this sub-sample, a 1 pp increase in the SII buffer level is associated with a 645.5 million euros reduction in SRISK.

variables does not entail a causality link between them, as the lower SRISK results from the markets correction after the abnormal pattern of SRISK in 2020 Q1.

Table 3 also shows that having SII status, irrespectively of the buffer level, lowers banks' contribution to systemic risk, as shown by the negative and significant estimates of SII_STAT. This result is to some extent related to Vogel (2020) and Bekaert and Breckenfelder (2019), who find that being designated an SII has different consequences for banks.³² This outcome holds for the full sample and for the pre-pandemic period, but it becomes non-significant during the pandemic. That is, after the onset of the coronavirus crisis, the contribution of banks to systemic risk was independent of their SII status. From a policy perspective, this significance of having SII status to determining the contribution of a bank to systemic risk means that having SII buffers can be interpreted as a signal for the markets of the commitment of these banks to increasing their resilience.

Finally, the estimates of SII_IN in Table 3 suggest that the designation as an SII immediately leads to an increase in systemic risk. Conversely, as evidenced by the coefficient of SII_OUT , once the bank ceases to be an SII, its contribution to systemic risk in the next period diminishes. This result is in line with Andrieş et al. (2020) and Gündüz (2020), who find that the initial market reaction to the SII designation tends to be negative given certain stigma effects related to tighter regulation and lower profitability once the requirement is set. To further explore the effect of the designation as an SII over time, we fit model (10), which is inspired by the local projections method (see Jordà (2005)). As stated in (10), we consider the baseline equation in (8), and recursively run a set of regressions for the lead dependent variable up to 12 quarters ahead. Figure 2 shows the estimated coefficients of SII_IN and their corresponding 95% confidence intervals for the 12 quarters. The initial impact of a bank's SII designation of a bank is positive, that is, it is associated with an increase in SRISK. However, this effect decreases shortly and becomes negative four quarters later in line with the negative coefficients for S_BUF and SII_STAT .

5.2 Additional insights into the drivers of the systemic risk driven by banks

Next, we analyse the potential impact of the adjustment mechanisms that banks use to comply with SII buffer requirements on their contribution to systemic risk. This approach allows us to disentangle which option dominates in banks' response and contributes the most to decreasing their systemicity due to higher capital requirements. As the link between SRISK and S_BUF

³²Vogel (2020) concludes that being labelled an O-SII brings a funding cost advantage for deposits, while Bekaert and Breckenfelder (2019) document that bond prices are higher for those banks belonging to the O-SII list.

during the pandemic crisis follows an abnormal pattern, hereafter we focus on the pre-pandemic sample up to 2019:Q4. 33

Table 4 reports the estimates for model (10) that extends the baseline model (8) by adding the main options for capital adjustment as regressors. The results indicate that higher equity, especially in the form of retained earnings, leads to a lower bank contribution to systemic risk. Also, the coefficient of S_BUF decreases once these variables are included. "De-risking", i.e. a lower share of risk-weighted assets, also diminishes a bank's systemic impact, although this estimate is less significant. Next, we fit the model in (11), which includes the interactions of SII_STAT with banks' capital adjustment options, to distinguish their impact for SIIs and non-SIIs. Table 5 reports the results, which show that the estimated coefficients of the interaction terms are mostly significant, while the estimates for the non-SII group are not, except for the risk weights. This outcome suggests that the impact of these options on a bank's contribution to systemic risk depends on having an SII status.

Specifically, the results in Table 5 indicate that the market perception of systemic risk improves when an SII bank increases its equity.³⁴ However, the two main drivers of this effect, retained earnings and equity issuances, work in opposite directions. Thus, the increase in SIIs' retained earnings is generally positively perceived by the markets, as signalled by the negative coefficient of its interaction with SII_STAT. One possible interpretation is that in this way banks could thus seek to improve their profits, for instance by increasing net interest income or reducing overall operating expenses (see Cohen and Scatigna (2016)). Conversely, issuing new equity could be perceived as a less attractive option because of its direct diluting effect on the market value of the existing shares and the uncertainty related to EU banks' post-GFC low valuations. Finally, we do not find a strong link between the proportion of risk-weighted assets and the level of SRISK, in either SIIs or non-SIIs. ³⁵ Indeed, there is very little empirical evidence of the trade-off between the rise in the share of risk-weighted assets to compensate for the increase in equity (see, for instance, Gropp et al., (2018)).

Once we consider the differential impact of these variables for the sample of SIIs, the effect of S_BUF on SRISK substantially decreases and even becomes non-significant in those model

³³This is mainly because the pandemic crisis represents an exogenous shock to banks' market valuations and there was a massive release and other prudential changes to SII buffers in some countries, as explained in the previous subsection.

³⁴This finding is in line with Dautović (2020), who suggested that a phased-in increase in capital requirements raises the CET1 capital ratio, thereby improving resilience and loss-absorbing capacity.

³⁵This outcome is to some extent contrary to Dautović (2020), who finds that being an SII is associated with potentially higher risk-taking on average.

specifications that include the interaction of SII_STAT with retained earnings and equity issuances as regressors. In other words, once we control for these drivers, the impact of the SII buffer level on a bank's systemic nature disappears. This indicates that an important part of the decrease in SRISK associated with increases in S_BUF is mediated by increases in equity, particularly via retained earnings.

Finally, Table 6 reports the estimates of model (11) with SII_STAT instead of S_BUF as the main explanatory variable. This approach allows us to disentangle the impact of having SII status on banks' contribution to systemic risk in Table 3 from banks' decisions to adjust their capital to comply with SII requirements.³⁶ That is, we aim to quantify the residual impact of having SII status once we control for these capital-related variables. Contrary to the results in Table 5 for the SII buffer level, the estimate of SII_STAT is still significant once we include all adjustment options—namely, retained earnings, equity issuances and share of risk-weighted assets—. This result suggests that having SII status is itself positively perceived by markets and decreases the contribution to the systemic risk.

6 Conclusions

In this paper we investigate whether SII buffers are effective at lowering the contribution of these large and complex banks to systemic risk. We also analyse what the possible drivers of the banks' systemicity adjustment are. We proxy banks' perceived systemic risk with the measure SRISK in Brownlees and Engle (2017), the dependent variable of our empirical analysis. This is a broadly used metric of systemic risk that can be easily computed with bank and market-based data. Then, we fit a number of fixed effects panel-data models to analyse the link between the SII buffer level and having SII status, and the SRISK indicator for a sample of listed European banks from 2008 Q1 to 2021 Q3.

According to our results, there is a negative relationship between the SII buffer level and banks' contribution to systemic risk. Therefore, higher capital requirements for systemic banks achieve the goal sought by regulators, as they lead to a decrease in perceived systemic risk. Furthermore, being designated as an SII also decreases banks' contribution to systemic risk, but this effect is time sensitive. The short-term impact of SII designation on SRISK appears to be positive (i.e. it increases SRISK), potentially due to a market stigma effect, while the medium-term effect turns

 $^{^{36}}$ Estimates of the interactions of SII_STAT with the different bank-related variables are relatively similar to those reported in Table 6. The main difference is that in Table 6 the link between the proportion of risk-weighted assets and SRISK only holds for SIIs.

negative. Finally, we control for the main options banks use to comply with higher SII requirements to further analyse the determinants of this perceived lower systemic risk. The results indicate that an increase in banks' equity through retained earnings is the main driver of this effect. Finally, once we control for these bank-based drivers, the residual effect of having SII status on perceived systemic risk is still negative and significant. This outcome means that being an SII provides a positive signal to markets by further decreasing its contribution to systemic risk.

Our results have important financial stability implications, in particular regarding the discussion of the role of SII buffers as an effective instrument for increasing these banks' resilience and for reducing their need for government interventions. Further research to fully understand the impact of SII buffers would be needed to guide policy responses to address the "too big to fail" status of SIIs. For instance, this paper does not address buffer calibration. Moreover, impact analysis of SII buffers on different measures of systemic risk, not only the SRISK indicator, would be useful to provide a more holistic view on the implications of SII buffers.

Appendix A: Estimation of the long-run marginal expected short-fall (LRMES)

This appendix describes the procedure to estimate the firm equity return conditional on the systemic event, LRMES, as defined in (4). LRMES, is non-observable and, in line with Brownlees and Engle (2016), we calculate this quantity using a DCC-GARCH model (see Engle (2002), (2009)). Following Brownlees and Engle (2017), we denote the logarithmic returns of bank i and market m as $r_{it} = \log(1 + R_{it})$ and $r_{mt} = \log(1 + R_{mt})$. Conditional on the information set available at t - 1, I_{t-1} , both variables are jointly distributed and follow an unspecified distribution D with zero mean and time-varying variance and covariance matrix,

$$\begin{bmatrix} r_{it} \\ r_{mt} \end{bmatrix} \mid I_{t-1} \sim D \left(\mathbf{0}, \begin{bmatrix} \sigma_{it}^2 & \rho_{it}\sigma_{it}\sigma_{mt} \\ \rho_{it}\sigma_{it}\sigma_{mt} & \sigma_{mt}^2 \end{bmatrix} \right). \tag{13}$$

The time varying volatilities are assumed to follow a GJR-GARCH model (Glosten, Jagannathan and Runkle (1993)) model as follows,

$$\sigma_{it}^2 = \omega_i + (\alpha_i + \gamma_i I_{it-1}^-) r_{it}^2 + \beta_i \sigma_{it-1}^2$$
(14)

$$\sigma_{mt}^2 = \omega_m + (\alpha_m + \gamma_m I_{mt-1}^-) r_{mt}^2 + \beta_m \sigma_{mt-1}^2, \tag{15}$$

where $I_{it}^- = 1$ if $r_{it} < 0$ and $I_{mt}^- = 1$ if $r_{mt} < 0$. Next, like in Brownlees and Engle (2017), we define the standardised log returns as $\epsilon_{jt} = \frac{r_{jt}}{\sigma_{jt}}$, while their correlation is given by,

$$Corr \begin{pmatrix} \epsilon_{it} \\ \epsilon_{mt} \end{pmatrix} = \begin{bmatrix} 1 & \rho_{it} \\ \rho_{it} & 1 \end{bmatrix} = \operatorname{diag}(Q_{it})^{-1/2} Q_{it} \operatorname{diag}(Q_{it})^{-1/2}, \tag{16}$$

where Q_{it} is the pseudo correlation matrix with the following expression,

$$Q_{it} = (1 - \alpha_{ci} - \beta_{ci})S_i + \alpha_{ci} \begin{bmatrix} \epsilon_{it-1} \\ \epsilon_{mt-1} \end{bmatrix} \begin{bmatrix} \epsilon_{it-1} \\ \epsilon_{mt-1} \end{bmatrix}' + \beta_i Q_{it-1}, \tag{17}$$

where S_i is the the unconditional correlation matrix between bank and market-adjusted returns, r_i and r_m , respectively. Using quasi-maximum likelihood, we can estimate the parameters $(\omega_{V,i}, \omega_{V,m}, \alpha_{V,i}, \alpha_{V,m}, \gamma_{V,i}, \gamma_{V,m}, \beta_{V,i}, \beta_{V,m}, \alpha_{C}, \beta_{C})$ as well as the time-varying volatilities $\{\sigma_{i,t}, \sigma_{m,t}\}_{t=1,\dots,T}$ and correlations $\{\rho_{i,t}\}_{t=1,\dots,T}$. The LRMES can, then, be calculated via simulations. For this purpose, we first compute the standardised innovations

$$\epsilon_{m,t} = \frac{r_{m,t}}{\sigma_{mt}}, \text{ and } \xi_{i,t} = \left(\frac{r_{i,t}}{\sigma_{i,t}} - \rho_{i,t}\epsilon_{m,t}\right) / \sqrt{1 - \rho_{i,t}^2}$$
(18)

for t = 1, ..., T. To generate joint paths of $\{R_{i,t+l}, R_{m,t+l}\}_{l=1,...,h}$, we first sample with replacement h pairs of standardized returns $\{\epsilon_{m,k}, \xi_{i,k}\}_{k=1,...,h}$. Starting with the estimated $\sigma_{i,T}$, $\sigma_{m,T}$, $\rho_{i,T}$, we can compute $\sigma_{i,T+1}$, $\sigma_{m,T+1}$, $\rho_{i,T+1}$ using expressions from (15) to (17), and $r_{i,T+1}$, $r_{m,T+1}$ using the sampled $\{\epsilon_{m,1}, \xi_{i,1}\}$. Iterating, we obtain a simulated sample $\{R_{i,t+l}, R_{m,t+l}\}_{l=1,...,h}$. The LRMES is, then, simply calculated as the average of $R_{i,t+h}$ over paths in which $R_{m,t+h} < C$.

Appendix B: Sample of listed banks

- AUSTRIA: Bank für Tirol und Vorarlberg; BAWAG Group; BKS Bank; Erste Group Bank;
 Oberbank; Raiffeisen Bank International; Volksbank Vorarlberg.
- BELGIUM: Dexia; KBC Group.
- BULGARIA: Bulgarian American Credit Bank; Central Cooperative Bank; First Investment Bank; Texim Bank.
- CROATIA: Privredna banka Zagreb.
- CYPRUS: Bank Cyprus Holdings Public; Hellenic Bank Public.
- CZECH REPUBLIC: Komercní banka; MONETA Money Bank.
- DENMARK: BankNordik; Danske Andelskassers Bank; Danske Bank; Den Jyske Sparekasse;
 Djurslands Bank; Fynske Bank; GrønlandsBANKEN; Hvidbjerg Bank; Jutlander Bank;
 Jyske Bank; Kreditbanken; Lån & Spar Bank; Lollands Bank; Møns Bank; Nordfyns Bank;
 Ringkjøbing Landbobank; Salling Bank; Skjern Bank; Spar Nord Bank; Sparekassen SjællandFyn; Sydbank; Totalbanken; Vestjysk Bank.
- ESTONIA: AS LHV Group.
- FINLAND: Ålandsbanken; Evli Pankki Oyj; Nordea Bank Abp; Oma Säästöpankki Oyj.
- FRANCE: BNP Paribas; CRCAM de Toulouse 31; CRCAM Paris et IDF; CRCAM d'Ille-et-Villaine; CRCAM du Morbihan; CRCAM de Nord de France; CRCAM Brie Picardie; CR-CAM du Languedoc; CRCAM Atlantique Vendee; Crédit Agricole; Natixis; Société Générale.
- GERMANY: Aareal Bank; Comdirect bank; Commerzbank; Deutsche Bank; Deutsche Pfandbriefbk; ProCredit Holding.
- GREECE: Alpha Bank; Attica Bank; Eurobank Ergasias; National Bank Greece; Piraeus Financial Holdings.

- HUNGARY: OTP Bank; Takarék Jelzálogbank Nyrt.
- ITALY: Banca Carige; Banca Finnat Euramerica; Banca Generali; Banca Monte dei Paschi di Siena; Banca Popolare di Milano; Banca Popolare di Sondrio; Banca Profilo; Banca Sistema; Banco BPM Società per Azioni; Banco di Desio e della Brianza; Banco di Sardegna; BPER Banca; Credito Emiliano; FinecoBank; Banca Fineco; Intesa Sanpaolo; Mediobanca Banca di Credito Fi nanziario; UniCredit; Unione di Banche Italiane.
- LITHUANIA: AB Siauliu Bankas.
- NETHERLANDS: ABN AMRO Bank; ING Groep; Van Lanschot Kempen.
- NORWAY: Aurskog Sparebank; DNB ASA; Høland og Setskog Sparebank; Instabank; Jæren Sparebank; Komplett Bank; Melhus Sparebank; Norwegian Finans Holding; Sandnes Sparebank; Sbanken; Skue Sparebank; Sogn Sparebank; SpareBank 1; SpareBank 1 Helgeland; SpareBank 1 NordNorge; Sparebank 1 Nordvest; SpareBank 1 Østfold Akershus; SpareBank 1 Østlandet; SpareBank 1 Ringerike Hadeland; SpareBank 1 SMN; SpareBank 1 SRBank; SpareBank 1 Telemark; Sparebanken Møre; Sparebanken Øst; Sparebanken Sør; Sparebanken Vest; Totens Sparebank; Voss Veksel og Landmandsbank.
- POLAND: Alior Bank; Bank Handlowy w Warszawie; Bank Millennium; Bank Ochrony Srodowiska; Bank Polska Kasa Opieki; BNP Paribas Bank Polska; Getin Holding; Getin Noble Bank; ING Bank Slaski; mBank; Powszechna Kasa Oszczedności Bank Polski; Santander Bank Polska.
- PORTUGAL: Banco BPI: Banco Comercial Português; Banco Espírito Santo.
- ROMANIA: Banca Transilvania; BRD Groupe Société Générale.
- SPAIN: Banco Bilbao Vizcaya Argentaria; Banco de Sabadell; Banco de Valencia; Banco Popular Español; Banco Santander; Bankia; Bankinter; CaixaBank; Liberbank; Unicaja Banco.
- SWEDEN: Avanza Bank Holding; Collector; Handelsbanken; Skandinaviska Enskilda Banken;
 Swedbank; TF Bank.
- SLOVAKIA: OTP Banka Slovensko; Vseobecna uverova banka.
- UNITED KINGDOM: Barclays; HSBC Holdings; Lloyds Banking Group; Metro Bank; NatWest Group; Standard Chartered.

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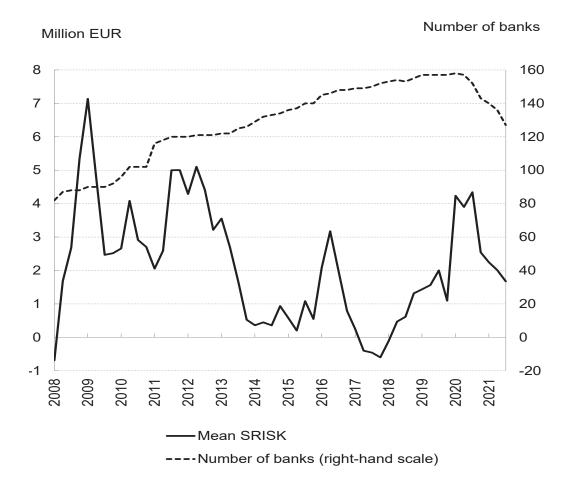
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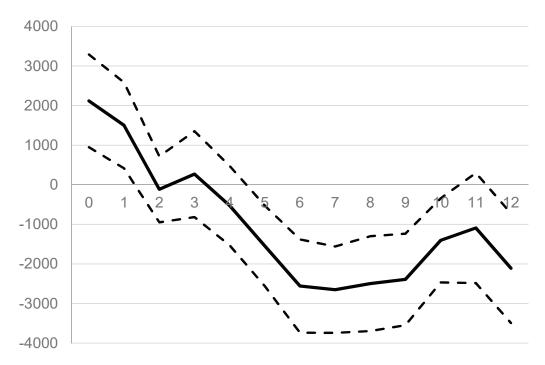
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Figure 1: Mean SRISK and number of banks



Note: Mean SRISK and number of banks (right-hand scale) for a panel of 168 European listed banks.

Figure 2: Local projection estimator of SII_IN for twelve quarters



Note: The unbroken line depicts the local projection estimator for SII_IN , a dummy variable that is one only in the period when the bank becomes an SII, during twelve quarters for model (9). The broken lines are the 95% confidence intervals.

Table 1: Descriptive statistics of SRISK, the SII buffer level (S_BUF) , and four transmission channels.

	SIIs			Non-Sl	Non-SIIs			
	Mean	SD	Min.	Max.	Mean	SD	Min.	Max.
Panel A: Full sample								
SRISK	5861	18335	-66560	90926	640	6474	-29177	85537
S_BUF	1.2	1.3	0.0	6.5	-	_	-	-
Total equity	29880	35824	137	183054	4178	10627	8	12789
Retained earnings	14724	22043	-11715	133314	2006	5186	-21178	86138
Risk-weighted assets (RWAs)	42.2	16.1	15.5	86.0	56.3	17.6	3.5	98.3
Equity issuances	5807	7338	0	31694	546	1871	0	21594
Panel B: 2008 Q1-2019 Q4								
SRISK	5011	18494	-66560	79725	712	6874	-29177	85537
S_BUF	1.1	1.3	0.0	5.0	_	_	_	_
Total equity	32000	37100	137	183000	4561	11200	8	128000
Retained earnings	15700	22900	-11700	133000	2132	5439	-21200	86100
Risk-weighted assets (RWAs)	42.7	16.6	15.5	86.0	57.1	17.6	4.3	98.3
Equity issuances	6085	7301	0	31694	632	2062	0.00	21595
Panel C: 2020 Q1-2021 Q3								
SRISK	8345	17653	-14577	90926	113	1748	-6788	16780
S_BUF	1.5	1.2	0	6.5	_	_	-	-
Total equity	23602	31145	207	180427	1408	2572	20	20452
Retained earnings	11885	18964	-11664	133314	929	1635	-1136	11873
Risk-weighted assets (RWAs)	40.8	14.5	17.1	77.5	50.4	16.1	3.5	96.6
Equity issuances	5080	7604	0	31694	290	609	0	3767

Note: SIIs stands for "systemically important financial institutions", SRISK is the systemic risk of each listed bank as measured by the SRISK indicator in Brownlees and Engle (2017) and S_BUF denotes the SII buffer level.

Table 2: Variable definitions and data sources.

VARIABLE	DESCRIPTION	SOURCE
SRISK	Systemic risk contribution of individual banks as proxyed by the SRISK indicator (Engle and Brownlees, 2017)	Own calculations
Total liabilities	Quarterly total liabilities at consolidated level, millions of euro	SNL
Market value	Market capitalisation, which is the product of share price and the number of ordinary shares in issue, for the last day of each period, millions of euro Refinitiv Datastream	Refinitiv Datastream
STOXX Europe 600	Stock market index for the last day of each period	Refinitiv Datastream
SII characteristics		
S_BUF	Level of structural buffer for SIIs, which is the combination of the G-SII and O-SII buffers and SyRB, for the last day of each period, %	European Systemic Risk Board (ESRB)
SII_STAT	Dummy variable that takes the value of 1 once the bank is designated as an SII in that period and 0 otherwise	European Banking Authority (EBA)
NI— IIS	Dummy variable that takes the value of 1 when the bank is designated as an SII and 0 otherwise	European Banking Authority (EBA)
SILOUT	Dummy variable that takes the value of 1 when the bank stops being designated as an SII and 0 otherwise	European Banking Authority (EBA)
Bank variables		
Total equity	Includes par value, paid-in capital, retained earnings, and other adjustments to equity, million EUR	SNL
Retained earnings	Accumulated net income and dividends, milion EUR	SNL
Risk-weighted assets (RWAs)	Risk-weighted assets (RWAs) Total risk-weighted assets, as defined by the latest regulatory and supervisory guidelines, as a percentage of total assets, %	SNL
Equity issuances	Current value of the share issuance deal, thousand of euro	Dealogic
Total assets	All assets owned by the company for the last day of each period, as carried on the balance sheet, million EUR	SNL
Return on equity (RoE)	Net income as a percentage of average equity, %	SNL
Country variables		
CCyB	Level of countercyclical capital buffer for the last day of each period, $\%$	European Systemic Risk Board (ESRB)
CCoB	Level of capital conservation buffer, %	European Systemic Risk Board (ESRB)
SyRB	Level of systemic risk buffer if applied to non-SIIs for the last day of each period, $\%$	European Systemic Risk Board (ESRB)
GDP	GDP per capita in purchasing power standards (PPS) with respect to the EU27 average. Average quarter at $2010 = 100$	Eurostat
CDS	Sovereign credit default swap (CDS) spreads in basis points	Refinitiv Datastream

Table 3: Estimates of the baseline model for the total sample and for the pre- and post-pandemic period.

Pane	l A: Full sa	ample	Panel E	3: 2008 Q1-	2019 Q4	Panel C	: 2020 Q1	-2021 Q3
-79.40			-645.5***			-27.16		
(276.7)			(223.4)			(202.6)		
	-1303**			-1767***			756.4	
	(518.3)			(506.8)			(476.0)	
		2120***			2673***			-486.9
		(597.7)			(697.3)			(654.4)
		-214.3			-420.5			-1225**
		(460.3)			(598.8)			(596.4)
0.039***	0.039***	0.039***	0.034***	0.034***	0.034***	-0.019	-0.019	-0.019
(0.003)	(0.003)	(0.003)	(0.005)	(0.005)	(0.005)	(0.011)	(0.011)	(0.011)
-8.10***	-8.14***	-8.08***	-7.45**	-7.21**	-7.12**	-1.36	-1.43	-1.34
(3.01)	(3.01)	(2.99)	(2.99)	(2.91)	(2.89)	(4.35)	(4.33)	(4.35)
-499.0**	-513.6**	-522.7^{*}	-439.9*	-679.7^{***}	-722.3**	-411.0	-396.0	-396.8
(236.1)	(254.0)	(284.2)	(232.7)	(258.7)	(308.2)	(427.2)	(429.9)	(431.1)
318.5***	167.9	355.2***	388.3***	413.1***	688.2***	243.8	263.4*	266.3
(100.6)	(115.3)	(130.5)	(122.3)	(132.0)	(160.3)	(153.1)	(155.9)	(166.4)
636.3***	653.9***	617.4***	421.3**	304.1	235.7	_	_	_
(208.1)	(228.0)	(234.8)	(198.1)	(198.3)	(211.0)	_	_	_
-76.04***	-71.69***	-78.45***	-39.95	-56.64**	-65.93***	-114.6*	-114.1^{*}	-113.5^{*}
(26.27)	(24.02)	(23.43)	(25.14)	(25.41)	(23.47)	(68.16)	(68.08)	(68.20)
0.003	-0.013	-0.002	-0.003	-0.043	-0.037	-4.197	-4.307	-4.145
(0.032)	(0.036)	(0.032)	(0.032)	(0.034)	(0.031)	(10.12)	(10.16)	(10.13)
6,487	6, 487	6,487	5,501	5,501	5,501	986	986	986
0.396	0.400	0.397	0.381	0.385	0.380	0.177	0.177	0.177
	-79.40 (276.7) 0.039*** (0.003) -8.10*** (3.01) -499.0** (236.1) 318.5*** (100.6) 636.3*** (208.1) -76.04*** (26.27) 0.003 (0.032) 6,487	-79.40 (276.7) -1303** (518.3) 0.039*** (0.003) (0.003) -8.10*** -8.14*** (3.01) (3.01) -499.0** -513.6** (236.1) (254.0) 318.5*** 167.9 (100.6) (115.3) 636.3*** 653.9*** (208.1) (228.0) -76.04*** -71.69*** (26.27) (24.02) 0.003 -0.013 (0.032) (0.036) 6,487 6,487	(276.7)	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$

Note: Dependent variable: Systemic risk contribution of individual banks as proxied by the SRISK indicator (see Brownlees and Engle (2017)); all explanatory variables are lagged one period; S_BUF : SII buffer level; SII_STAT : Binary dummy, $SII_STAT = 1$ while a bank has SII status; SII_IN : Binary dummy, $SII_IN = 1$ only in the quarter when a bank becomes an SII; SII_OUT : Binary dummy, $SII_OUT = 1$ only in the quarter when the bank stops being an SII; RoE: Return on equity; CCyB: Countercyclical capital buffer; CCoB: Capital conservation buffer; GDPpc: GDP per capita; CDS: Credit default swap spreads. See Table 2 for a complete description of the explanatory variables and data sources. Standard errors are shown in parentheses. Standard errors are robust to heteroscedasticity and serial correlation. Intercept, time and bank fixed effects are included but not reported. ***, *** and * refer to significance at 1%, 5% and 10% level, respectively.

Table 4: Estimates of the baseline model with bank variables involving changes to the capital structure.

	M1	M2	M3	M4	M5	M6	M7	M8
S_BUF	-668.1***	-507.0**	-569.0***	-599.1***	-672.7***	-516.8***	-534.4***	-541.3***
	(228.0)	(196.3)	(193.0)	(217.7)	(228.3)	(194.1)	(191.9)	(190.4)
Total Equity		-0.210**				-0.216**		
		(0.0856)				(0.0858)		
Retained earnings			-0.220***				-0.203***	-0.204***
			(0.0569)				(0.0657)	(0.0658)
Equity issuances				-0.196			-0.120	-0.126
				(0.121)			(0.134)	(0.136)
Risk weights					6.724	21.18*		13.61
					(11.75)	(11.90)		(11.91)
Total Assets	0.035***	0.041***	0.039***	0.034***	0.035***	0.041***	0.038***	0.038***
	(0.005)	(0.007)	(0.004)	(0.005)	(0.005)	(0.007)	(0.005)	(0.005)
RoE	-7.50**	-6.20**	-5.99**	-7.63**	-7.46**	-6.02**	-6.18**	-6.09**
	(3.04)	(2.92)	(2.51)	(3.14)	(3.02)	(2.85)	(2.62)	(2.58)
CCyB	-465.8*	-592.9**	-470.2^{*}	-606.9**	-470.9*	-612.7^{**}	-556.1**	-571.1**
	(244.6)	(234.5)	(245.6)	(239.4)	(246.8)	(235.2)	(243.6)	(247.9)
SyRB	388.6***	371.4***	328.6**	384.7***	386.7***	364.8***	330.8**	326.6**
	(127.5)	(138.4)	(137.2)	(125.6)	(126.8)	(139.2)	(135.2)	(134.6)
CCoB	447.7**	270.2	401.9*	389.9*	453.0**	281.8	370.1*	379.0*
	(210.2)	(196.4)	(210.0)	(201.1)	(208.9)	(195.3)	(202.9)	(202.1)
GDPpc	-40.37	-40.65^{*}	-24.39	-55.29**	-40.36	-40.62*	-34.72	-35.15
	(26.51)	(23.23)	(23.50)	(27.62)	(26.39)	(22.77)	(27.69)	(27.82)
CDS	-0.003	-0.016	-0.026	-0.012	-0.001	-0.009	-0.029	-0.025
	(0.032)	(0.029)	(0.027)	(0.032)	(0.033)	(0.030)	(0.028)	(0.029)
N	5, 103	5, 103	5, 103	5, 103	5, 103	5, 103	5, 103	5, 103
R^2	0.381	0.403	0.398	0.386	0.381	0.404	0.400	0.401

Note: Dependent variable: Systemic risk contribution of individual banks as proxied by the SRISK indicator (see Brownlees and Engle (2017)); all explanatory variables are lagged one period; S_BUF : SII buffer level; RoE: Return on equity; CCyB: Countercyclical capital buffer; CCoB: Capital conservation buffer; GDPpc: GDP per capita; CDS: Credit default swap spreads. See Table 2 for a complete description of explanatory variables and data sources. Standard errors are shown in parentheses. Standard errors are robust to heteroscedasticity and serial correlation. Intercept, time and bank fixed effects are included but not reported. The sample period runs from 2008 Q1 to 2019 Q4. ***, ** and * refer to significance at 1%, 5% and 10% level, respectively.

Table 5: Estimates of the baseline model with bank variables involving changes to the capital structure and interactions with SII status.

	M1	M2	М3	M4	M5	M6	M7	M8
S_BUF	-668.1***	-413.1**	-307.8*	-577.6***	-653.9**	-651.9***	-197.0	-204.8
	(228.0)	(180.4)	(162.2)	(206.4)	(257.3)	(207.6)	(172.6)	(230.8)
Total Equity		-0.087				-0.078		
		(0.100)				(0.100)		
Total Equity $\times SII_STAT$		-0.069**				-0.079**		
		(0.031)				(0.034)		
Retained earnings			0.0325				0.159	0.159
			(0.0732)				(0.104)	(0.104)
Retained earnings $\times SII_STAT$			-0.191***				-0.345***	-0.345***
			(0.047)				(0.073)	(0.073)
Equity issuances				-0.0362			-0.442	-0.447
				(0.342)			(0.294)	(0.299)
Equity issuances $\times SII_STAT$				-0.150			0.555**	0.553**
				(0.246)			(0.238)	(0.246)
Risk weights					7.084	19.59*		14.93
					(11.44)	(10.60)		(11.84)
Risk weights× SII_STAT					-1.539	19.82*		0.053
					(9.479)	(10.31)		(9.83)
N	5, 103	5, 103	5, 103	5, 103	5, 103	5, 103	5, 103	5,103
R^2	0.381	0.418	0.428	0.374	0.381	0.421	0.445	0.445

Note: Dependent variable: Systemic risk contribution of individual banks as proxied by the SRISK indicator (see Brownlees and Engle (2017)); all explanatory variables are lagged one period; S_BUF : SII buffer level; SII_STAT : Binary dummy, $SII_STAT = 1$ while a bank has SII status; RoE: Return on equity; CCyB: Countercyclical capital buffer; CCoB: Capital conservation buffer; GDPpc: GDP per capita; CDS: Credit default swap spreads. See Table 2 for a complete description of explanatory variables and data sources. Standard errors are shown in parentheses. Standard errors are robust to heteroscedasticity and serial correlation. Intercept, time and bank fixed effects and controls are included but not reported. The sample period runs from 2008 Q1 to 2019 Q4. ***, ** and * refer to significance at 1%, 5% and 10% level, respectively.

Table 6: Estimates of the baseline model with bank variables involving changes to the capital structure and interactions with SII status.

	M1	M2	M3	M4	M5	M6	M7	M8
SII_STAT	-1,873***	-239.5	-92.47	-1,433**	-6,932***	-3,870**	-732.0*	-3,320***
	(512.3)	(589.3)	(456.5)	(630.1)	(1,534)	(1,824)	(420.3)	(1, 216)
Total Equity		-0.0945				-0.115		
		(0.103)				(0.108)		
Total Equity $\times SII_STAT$		-0.0674*				-0.0456		
		(0.0368)				(0.0415)		
Retained earnings			0.0327				0.146	0.126
			(0.0795)				(0.105)	(0.109)
Retained earnings× SII_STAT			-0.194***				-0.339***	-0.311***
			(0.0527)				(0.0715)	(0.0782)
Equity issuances				-0.0923			-0.462	-0.461
				(0.343)			(0.285)	(0.293)
Equity issuances $\times SII_STAT$				-0.0584			0.594**	0.600**
				(0.267)			(0.229)	(0.234)
Risk weights					-1.020	14.65		9.479
					(10.33)	(10.71)		(11.24)
Risk weights× SII_STAT					110.5***	69.35**		50.06**
					(26.86)	(28.63)		(21.06)
N	5,103	5, 103	5, 103	5,103	5, 103	5, 103	5, 103	5,103
R^2	0.387	0.416	0.427	0.390	0.404	0.423	0.446	0.449

Note: Dependent variable: Systemic risk contribution of individual banks as proxied by the SRISK indicator (see Brownlees and Engle (2017)); all explanatory variables are lagged one period; S_BUF : SII buffer level; SII_STAT : Binary dummy, $SII_STAT = 1$ while a bank has SII status; RoE: Return on equity; CCyB: Countercyclical capital buffer; CCoB: Capital conservation buffer; GDPpc: GDP per capita; CDS: Credit default swap spreads. See Table 2 for a complete description of explanatory variables and data sources. Standard errors are shown in parentheses. Standard errors are robust to heteroscedasticity and serial correlation. Intercept, time and bank fixed effects and controls are included but not reported. The sample period runs from 2008 Q1 to 2019 Q4. ***, ** and * refer to significance at 1%, 5% and 10% level, respectively.

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