

From: [REDACTED]
Sent: lundi 20 juin 2022 17:18
To: [REDACTED]
Cc: FISMA D1; [REDACTED]
Subject: FW: AMENDMENT of Art. 2 paragraph 5 CRD | Association of German Public Banks (VOEB) for Investitionsbank Sachsen Anhalt
Attachments: Implementation of Basel III_Amendment of Art. 2 paragraph 5 CRD_Investitionsbank Sachsen-Anhalt.pdf; 750004-g22_Anlage_ErrichtungsG_GVBI-2021-598.pdf
Signed By: [REDACTED]

[REDACTED]
FYI (and for Ares registration please by assistants).

[REDACTED]

From: [REDACTED] <[\[REDACTED\]@voeb.de](mailto:[REDACTED]@voeb.de)>
Sent: Monday, June 20, 2022 12:20 PM
To: [REDACTED] <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Cc: [REDACTED] <[\[REDACTED\]@voeb.de](mailto:[REDACTED]@voeb.de)>; [REDACTED] <[\[REDACTED\]@voeb.de](mailto:[REDACTED]@voeb.de)>; [REDACTED] <[\[REDACTED\]@voeb.de](mailto:[REDACTED]@voeb.de)>
Subject: AMENDMENT of Art. 2 paragraph 5 CRD | Association of German Public Banks (VOEB) for Investitionsbank Sachsen Anhalt

Dear Mr [REDACTED]

We would like to inform you that, according to the Act of the Federal State of Saxony-Anhalt on the establishment of Investitionsbank Sachsen-Anhalt as a legally independent promotional bank, the hitherto legally dependent promotional bank of the Federal State of Saxony-Anhalt with partial legal capacity will be transferred to the then newly established independent institution under public law with full legal capacity "Investitionsbank Sachsen-Anhalt" as of March 1, 2023.

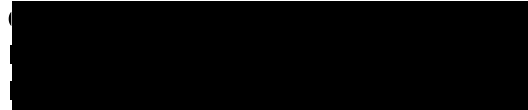
The Act establishing Investitionsbank Sachsen-Anhalt as a legally independent promotional bank is based in all material regulatory areas on the laws establishing the already existing independent promotional banks of the German federal states. The legally independent German promotional banks were exempted from the scope of application of the CRD with effect from June 27, 2019, under Article 2 (5) No. 5 CRD as amended by Directive 2019/878 EU. The reasons relevant for the exemption apply accordingly also to the newly established Investitionsbank Sachsen-Anhalt. Taking this into account and to ensure equal treatment between legally independent promotional banks in Germany, we think that "Investitionsbank Sachsen-Anhalt" should be added to Art. 2 (5) No. 5 CRD during the ongoing review of the banking package.

Please refer to the attached letter and annex for more details.

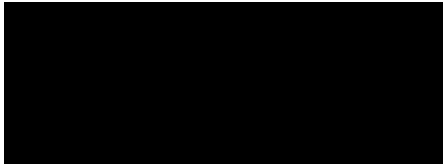
Should you have any further questions, please feel free to contact us.

Yours sincerely,

[Redacted signature]



Association of German Public Banks, VÖB
Avenue de la Joyeuse Entrée 1-5
B – 1040 Brussels



Internet: www.voeb.de

The Association of German Public Banks (VOEB) represents 59 members. VOEB members include the Landesbanken, as well as the promotional and development banks owned by the Federal Republic of Germany and the individual German states, and also several private as well as cooperative banks. Our members cumulated total assets account to around 3,100 billion euros, constituting approximately one-third of the German banking market. Ten of our members are under direct ECB supervision (115 in total, 21 in Germany). Our members honour their responsibilities towards SMEs and other enterprises, the public sector, along with retail customers; they are deeply rooted in their respective home regions all over Germany. With a 55 percent market share, VOEB members are market leaders in local government financing. Overall, they provide around 23 percent of all corporate lending in Germany. VOEB members employ more than 100,000 staff. More information is available at www.voeb.de.