SINGLE PROGRAMMING DOCUMENT

YEARS 2025-2027

EBA/REP/2024/03

FOREWORD

The EBA's programming for the years 2025-2027 largely remains in the continuation of the previous cycle as far as traditional areas of responsibility such as prudential regulation development and risk analysis are concerned, the period will also mark important changes for the authority, with the handover to AMLA of the EBA's standalone AML-CFT mandate, and the start of new mandates in the relation to the oversight of ICT-third-party service providers and the supervision of issuers of significant asset-referenced and e-money tokens.

The EBA will continue to strive and deliver on the many mandates received from the EU legislators. Work has been prioritised and scheduled so as to best address the tasks stemming from the authority's founding regulation and those reflecting ongoing and planned legislative and regulatory developments.

The EBA's activities in the coming years are also likely to be affected by new challenges arising for the financial sector from continued geopolitical tensions and an uncertain economic outlook. The European elections in 2024 will also result in new priorities and impetus from the co-legislators The EBA will stand ready to best support all its stakeholders in addressing those challenges, adjusting to evolving needs and providing adequate responses.

The EBA will continue to intensify its cooperation with competent authorities and other European bodies, including in new areas like digital finance, sustainability, and climate.

For the delivery of its many responsibilities the EBA will benefit from the many adjustments brought to its internal organisation introduced since 2021. It will pursue development of its HR strategy to maintain staff motivation at a high level and offer attractive career development opportunities. It will continue to modernising its organisation, to reap all possible benefits from internal synergies and modern working tools.

François-Louis Michaud
EBA Executive Director

LIST OF ABBREVIATIONS

ACP	EBA Advisory Committee on Proportionality	ICT	Information and communication technology
AML/CFT	Anti-money laundering/countering the financing of terrorism	IFD/R	Investment Firm Directive/Regulation
AMLA	Anti-money laundering authority	**IFRS**	International Financial Reporting Standard
AI	Artificial intelligence	**IMF**	International Monetary Fund
ART	Asset-referenced token	**IRB**	Internal ratings-based
AST	Assistant	**IRRBB**	Interest rate risk in the banking book
BCBS	Basel Committee on Banking Supervision	**IT**	Information technology
BoS	Board of Supervisors	**ITS**	Implementing technical standards
BRRD	Banking Recovery and Resolution Directive	**JC**	Joint Committee
CA	Competent authority	**KPI**	Key performance indicator
CRD	Capital Requirements Directive	**LCR**	Liquidity coverage ratio
CRR	Capital Requirements Regulation	**LFS**	Legislative financial statement
CSD	Credit Servicers and Credit Purchasers Directive	**MFF**	Multi-annual financial framework
CTTPs	Critical ICT Third-Party providers	**MiCAR**	Markets in Crypto-assets Regulation
DGSD	Deposit Guarantee Scheme Directive	**ML/TF**	Money laundering / Terrorism financing
DORA	Digital Operational Resilience Act	**MREL**	Minimum requirement for own funds and eligible liabilities
EBA	European Banking Authority	**NCA**	National competent authority
EC	European Commission	**NPL**	Non-performing loan
ECA	European Court of Auditors	**PSD2**	Revised Payment Services Directive
ECB	European Central Bank	**Q&A**	Questions and answers
EFIF	European Forum of Innovation Facilitators	**RTS**	Regulatory technical standards
EFTA	European Free Trade Association	**SA**	Standardised approach
EMAS	Eco-Management and Audit Scheme	**SDFA**	Supervisory Digital Finance Academy
EIOPA	European Insurance and Occupational Pensions Authority	**SNE**	Seconded national expert
EP	European Parliament	**SREP**	Supervisory review and evaluation process
ESA	European supervisory authority	**STS**	Simple, transparent, and standardised
ESMA	European Securities and Markets Authority	**SPD**	Single Programming Document
ESG	Environmental, social and governance	**TA**	Temporary agent
ESRB	European Systemic Risk Board	**TBC**	To be confirmed
EU	European Union	**TLAC**	Total loss-absorbing capacity
EUCLID	European centralised infrastructure for supervisory data	**TTP**	Third-party provider
FinTech	Financial technology	**VAT**	Value-added tax
GL	Guidelines		
HR	Human resources		

MISSION STATEMENT

The EBA's mission is to contribute to the stability and effectiveness of the European financial system through consistent, transparent, simple and fair regulation and supervision to the benefit of all EU citizens.

1. The European Banking Authority (EBA) is an independent EU Authority accountable to the European Parliament (EP), the European Council of the EU and the EC. The role of the EBA is to improve the functioning of the internal market by ensuring appropriate, efficient, and harmonised supervision and regulation in the EU, and by contributing to an efficient functioning of the latter banking and financial system.

2. The EBA is part of the European System of Financial Supervision, together with two other supervisory authorities - ESMA and EIOPA – the ESRB, the JC of the ESAs, and the competent supervisory authorities.

3. Whilst supervisory authorities remain in charge of supervising individual financial institutions, the EBA develops technical standards and guidelines for banking and financial institutions and their supervisors throughout the EU. This single set of harmonised prudential rules – or European Single Rulebook – contributes to ensuring a level playing field and provides high protection to depositors, investors, and consumers.

4. Moreover, the EBA promotes convergence in supervisory practices to ensure a harmonised application of prudential rules. It investigates possible insufficient application of EU law by national authorities, take decisions in emergency situations, mediate disagreements between competent authorities.

5. It assesses risk and vulnerabilities in the EU banking sector through regular risk assessment reports and EU-wide stress tests.

6. The EBA will continue to contribute to the fight against financial crime in the EU's financial sector across its areas of competence even after AMLA has been set up.

7. With the finalisation of the DORA and MiCAR legislations, it is expected to start exerting new policy and oversight responsibilities in the areas of ICT-third party service provision and supervision of issuers of significant asset-referenced and e-money tokens.

SECTION I – GENERAL CONTEXT

8. The EBA's multi-annual work programme is prepared taking into account the agency's missions stemming from agreed or prepared EU legislations and from its founding regulation, as well as the evolving tasks assigned to it by the co-legislators. The planning needs to be aligned with the broader Union priorities and strategies for the financial sector as well as the overall economic context. It is presented following a standard template for EU decentralised agencies (Single Programming Document), first endorsed by the EBA's Management Board and subsequently by the Board of Supervisors.

9. While a large part of the EBA's mandates are subject to strict deadlines, the authority retains flexibility to adjust its work programme to unforeseen developments. This can be done both as part of the annual workplan and multi-annual revisions and at any point in time if circumstances warrant it (as was done in recent years, e.g. with the global pandemic in 2020, or more recently with the financial turmoil in early 2023).

10. The table below sets out the key factors considered at the time of planning, and how they are expected to affect EBA's work.

KEY FACTORS	DESCRIPTION / IMPACT
EC 2019-2024 priorities (link)	The EBA priorities and related activities for 2025-2027 will continue to contribute directly to two out of the six priorities set by the EC for 2019-2024: The **European Green Deal;** for Europe to become a modern, resource-efficient economy, and the first climate-neutral continent. The EBA will continue to work on anchoring ESG risks into regulation – including under the Pillar 1 framework - , supervisory and risk management practices. This includes addressing climate change risks through EU-wide stress test initiatives, in close cooperation with all relevant stakeholders. As an organisation, the EBA will keep up its efforts to maintain its registration with the Eco-Management and Audit Scheme (EMAS) obtained in 2022. **A Europe fit for the digital age,** to empower people with a new generation of technologies and the potential opportunities and transformative potential they offer for both EU customers and financial institutions. To overcome accompanying challenges for CAs in monitoring market developments and practices, and risks arising from interdependencies, the EBA will continue to encourage the sharing of supervisory knowledge and experience on a sectoral and multi-disciplinary basis to foster effective dialogue between all relevant and competent authorities.

	The EC's 2024 work programme which includes among many others, an initiative to cut down reporting burden by 25% in many sectors, including financial services, will also be of relevance for the EBA. Once the new College of Commissioners coming in after the European elections in 2024 has set out the priorities for 2024–2029 the EBA will consider any adjustments to its own priorities and multi-annual (and annual) work programme. The priorities of the incoming European Parliament will also be factored in.
DORA and MiCAR	The **Digital Finance Package** aims to increase the EU financial sectors' operational resilience. DORA entered into force in January 2023 with two years for implementation and aims to strengthen the digital operational resilience of the EU financial sector by streamlining and upgrading existing rules and bringing in new requirements where gaps were identified. DORA introduced an oversight framework for the critical ICT Third-Party providers (CTPPs) of the EU financial sector, a role assigned to ESAs. The ESAs are in the process of delivering 13 policy mandates – benefitting from the input of the recently established Joint Committee's sub-committee on Digital Operational Resilience (JC SC DOR). The ESAs are also preparing the methodological and operational frameworks to perform new oversight tasks in 2025. For MiCAR, which entered into force in June 2023, the EBA will, after delivery of numerous policy mandates by end-Q2 2024, aim to be ready to perform supervisory tasks in relation to issuers of asset-referenced tokens and e-money tokens that are determined to be 'significant' (in accordance with the criteria set out in MiCAR) from the beginning of 2025. The EBA will furthermore start issuing Opinions, at the request of national competent authorities, on the regulatory classification of crypto-assets, and to exercise product intervention powers. Once the oversight and supervision functions will be up and running, these activities might be followed by issuance of recommendations to CTPP (DORA) or enforcement (MiCAR). Requests to support the EC for the reports to prepare the MiCAR review are also already on the horizon.
EU's new Anti-Money Laundering Authority (AMLA)	In July 2021 the EC proposed that a new EU-level AML Authority (AMLA) be set up. According to the legislative proposals, the EBA's standalone AML/CFT mandates and powers will be transferred to the AMLA, which is likely to be established in 2024/25. Through 2025, the EBA will continue to support the transition to the new legal and institutional framework. Going forward, once the transfer of the EBA's standalone AML/CFT powers and mandates to the AMLA is complete, the EBA will work closely with AMLA to embed a holistic approach to tackling ML/TF and other financial crime risks

across all areas of supervision, and all stages of an institution's life cycle.

Continued legislative files: - **CRR III /CRD VI** - **CMU** - **IFR/D**	**Basel implementation in the EU.** Negotiations of the sixth Capital Requirements Directive and the third Capital Requirements Regulation have been completed in late 2023. The package intends to strengthen banks' resilience to shocks (implementing the final elements of the Basel III accord of December 2017, to contribute to the green transition and to provide stronger enforcement tools to supervisors. The EBA will be asked to deliver around 140 new mandates for technical standards and guidelines within 12 to 18 months from adoption. With the number of mandates significantly higher than in the initial draft legislative proposal (by about 40%), and without any additional resources allocated within this particular context, the EBA is faced with significant challenges for the full and timely delivery of what is expected. **Capital Markets Union.** The EC published its new action plan on the CMU in September 2020, announcing priorities for the next phase of the CMU. The EC is committed to 16 actions to achieve three key objectives: (1) to support a green, digital, inclusive and resilient economic recovery by making financing more accessible to European companies; (2) to make the EU an even safer place for individuals to save and invest long term; and (3) to integrate national capital markets into a genuine single market. The EBA will assist in delivering the Renewed Sustainable Finance Strategy and new EU regime for green bonds. Moreover, the review of securitisation regulation will aim to further strengthen the securitisation market and will build on the previous work of the EBA in this area. Of particular importance will be the focus on ensuring that the green transition will also be supported through securitisation and on developing an integrated European framework for covered bonds, based on high-quality standards and best market practices. Work on the mandates is ongoing (since late 2022), with finalisation foreseen in 2024-2025, after necessary analysis of the current market operation. The EBA is also expected to cooperate with the Commission on reports on the performance of the covered bond framework which are mandated in Article 31 of the Covered Bonds Directive and to be submitted to the European Parliament and Council by 2024/2025. Also in that context, the EBA will continue work started on a Call for Advice it has received from the Commission for the revision of the Covered Bond Directive. As part of the CMU action plan, the EBA has received / is expecting to receive a mandate in the form of a call for advice on insolvency benchmarking. Unlike anticipated in previous iterations of this document the Commission has postponed the reviews of the Mortgage Credit directive (MCD) and of the Consumer Credit Directive (CCD) to after

	the European elections. It is therefore not confirmed whether these reviews will affect the EBA's planning before 2028. Furthermore, by 2025, it is expected that EBA will have delivered its advice to the European Commission on the review of the Investment Firms Directive and Regulation (IFR/IFD). It is expected that EBA will be asked to contribute in potential review of the IFR/IFD.
Other EC strategies and proposals: - **Retail and Payments** - **Supervisory Data** - **Artificial intelligence** - **Sustainable Finance** - **Crisis management and deposit insurance (CMDI)** - **CSDR and EMIR reviews (with ISDA SIMM supervision)** - **Cybersecurity Regulation** - **Digital Euro**	The EC's **retail payments strategy**[1] aims to further develop the European payments market so Europe can benefit fully from innovation and the opportunities that come with digitalisation. To that end, the European Commission published, in June 2023, proposals for a revised Payment Service Directive (PSD3), a new Payment Servies Regulation (PSR), and a new Regulation on Open Finance (FIDA). The proposals are based inter alia on the technical advice the EBA had provided a year earlier and foresee around 35 mandates to be conferred on the EBA, for delivery between 2025 and 2027. One of the EC priorities is the realisation of the **EU data strategy,** the main objectives of which lie in the governance of data and the creation of a single market for data. The strategy aims to achieve a European financial data space to promote data-driven innovation. The EC builds on the supervisory data strategy[2], to improve supervisory data collection and make it fit for the future, and the European Single Access Point (ESAP) initiative which aims to create an EU-wide platform to facilitate investors' access to company data, including that of SMEs. The EBA continues to cooperate closely with the EC on both initiatives, with its EUCLID platform providing a key building block, which is complemented by ongoing work on a Pillar 3 data hub and by the implementation of the recommendations of the feasibility study on integrated reporting. Moreover, it is expected that further contributions will be requested by the EC with a view to developing a common data dictionary and data sharing infrastructure. The EC's 2024 work programme further aims at developing this strategy, with the already mentioned initiative to cut down reporting burden by 25% in many sectors, including financial services. It requires authorities to regularly review reporting requirements, remove any redundant or obsolete ones, and keep the reporting burden to a minimum, as well as to consider reusing existing data before introducing new requirements. It also targets the facilitation of sharing reported data between the ESAs, CAs, and with the EC, and, under certain conditions with other stakeholders. The initiative ties in with efforts the EBA has invested and continues to do so with Cost of Compliance study recommendations and related follow-up actions, the EBA's Integrated Reporting feasibility

[1] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0592.
[2] https://ec.europa.eu/info/publications/211215-supervisory-data-strategy_en.

study action plan, its own data strategy, all aiming at increasing efficiency, data sharing, standardisation.

Artificial intelligence (AI): the EC aims to achieve a European approach underpinning a resilient Europe for the digital decade where people and businesses can enjoy the benefits of AI. It focuses on two areas: excellence in AI and trustworthy AI. The European approach to AI will ensure that any AI improvements are based on rules that safeguard the functioning of markets and the public sector, and people's safety and fundamental rights. The EC AI strategy proposed measures to streamline research, policy options for AI regulation. The EBA will need to take into account how AI and machine learning (ML) impact bank business and risk management approaches, financial stability, and consumer protection. The finalisation of AI Act is expected to influence the work in this important area further.

The renewed **Sustainable Finance Strategy** announced by the EC in July 2021 lays out the major policy orientations needed for Europe to achieve the ambitions of the Green Deal, the EU Climate Law and to ensure a sustainable social recovery from the pandemic. The Authority is actively contributing to this strategy by fulfilling mandates in the areas of inter alia disclosure, supervision and risk management, prudential treatment of exposures, standards and labels, stress testing, ESG risk monitoring and identification, and greenwashing.

The EC's proposals for a strengthened **Crisis management and deposit insurance (CMDI)** framework, issued in April 2023, are aimed – in the revised BRRD proposals - to enable authorities to organise an orderly market exit for failing banks of any size and business model, including smaller players, drawing from lessons learned during from the first years of application of the existing rules. Further calls for advice or opinions, in addition to those already provided to support the preparation of the draft proposals are expected. Furthermore, the draft proposals contain requirements for the EBA to issue standards on provisions and to report to the Commission on the framework's effective and harmonised implementation.

The component of the CMDI proposal that focuses on deposit insurance proposes to revise the DGSD, based inter alia on technical advice the EBA had provided in previous years, and aims at better protecting depositors in the Union. 10 mandates (5 RTS and 5 guidelines) are proposed to be conferred on the EBA, including to test the practical application of the framework and improve ways to communicate deposit protection to customers.

Furthermore, the planned **CSDR and EMIR reviews** include several mandates for the EBA to develop draft regulatory proposals. Significantly, the EMIR review shapes up to include proposals for the supervision of ISDA SIMM (Standardised Initial Margin Model)

	which will pose further challenges, and will require additional resources. The EU Cybersecurity Regulation [3] (Regulation (EU, Euratom) 2023/2841) laying down measures for a high common level of cybersecurity at the institutions, bodies, offices and agencies of the Union, is expected to further impact the EBA as an authority and its planning. The EC's proposals for a 'single currency package' includes a legislative proposal establishing the legal framework for a possible digital euro as a complement to euro banknotes and coins also mandating EBA together with AMLA to issue guidelines specifying the interaction between AML/CFT requirements and the provision of basic digital euro payment services with a particular focus on financial inclusion of vulnerable groups.
Geopolitical and economic environment:	With the economic situation being continuously unstable in the wake of the global pandemic, the worsening geopolitical situation in early 2022 and the beginning of the war in Ukraine, the jitters in the financial markets in early 2023 and the Middle East crisis, economic repercussions are felt on a wider scale: high inflation and energy prices impact citizens in Europe and around the world and lead to lower, even negative, economic growth. Hot summers, severe fires but also catastrophic flooding and weather events have hit Europe and other regions around the globe very hard and serve as a strong reminder that actions to help the transition towards net zero targets and a more sustainable economy become increasingly urgent. Past regulatory and supervisory efforts have contributed to the resilience that the financial sectors and its actors have displayed throughout the last few years, with robust capital and long term funding ratios and ample liquidity buffers. The EBA EU-wide stress test have also contributed to the solvency of the banking sector and the results of the 2023 stress test have shown that the overall banking sector remain resilient. However, overall the macroeconomic outlook is uncertain, with persistent inflation, as well as still rising interest rates likely to impact the sector. Some early indicators are becoming apparent in the form of weakening asset quality, worsening funding conditions, and continuing financial volatility, putting strain on citizens and the economy at large, and on banks and other financial actors as well. The EBA will maintain an increased focus on monitoring these developments with a view to facilitating risk identification for its stakeholders, and proposing relevant responses if necessary.
EU institutional calendar	EU Parliament elections will take place in 2024. While this may affect the timing of adoption of level 1 and level 2 legislation that is in the pipeline, the EBA will work with Commission to see how work

[3] https://eur-lex.europa.eu/eli/reg/2023/2841.

	can be prioritised in order to minimise the risk that key policy developments be delayed (e.g. in the areas of DORA and MiCAR). Moreover, as indicated earlier, with the EU elections, the incoming College of Commissioners will set its own priorities for 2024–2029 term, and the EBA will take as soon as possible work to incorporate these into its own priorities and multi-annual (and annual) work programme. The priorities of the incoming European Parliament will also be factored in.
Regulatory coordination	The EBA will continue to deepen its links and coordination with other European and international regulatory bodies to address common, cross-cutting challenges, including AMLA once it has been set up. Coordination with a broader range of financial authorities, national competent authorities, and non-financial regulators will be needed in the areas of cyber risk, crime prevention, data protection, and competition. The authority will also continue and intensify its cooperation with the two other ESAs and the ESRB through their Joint Committee. It will continue to actively contribute to the Basel Committee work, especially on emerging topics related to innovation and ESG. It will also further develop its links with other EU agencies, in particular with ENISA in the context of cyber risk.
Resource constraints / reprioritisation	Resource constraints have become more acute with the need for the EBA to develop the MiCAR and DORA as well as the banking package policy mandates under tight schedules and without additional resources. This will be exacerbated further still by the 45 mandates expected to be conveyed on the EBA under the proposed PSD3, PSR, FIDA (Open Finance) and DGSD all of which would have to be delivered between 2025 and 2027. While the legislators foresee fee-funded resources for the DORA oversight and MiCAR supervisory activities from 2025 onwards, the organisational preparations for these activities or the development of the large number of regulatory mandates in the years 2023 and 2024 had to be done using existing resources. For the fee funded resources that are envisaged, there are uncertainties around the number of entities which can ultimately be charged fees and a risk that not all of the cost of staff working on MiCAR and DORA can be charged to supervised entities. meaning that they would have to be covered out of the existing budget, at the expense of current -and expanding - activities. A more immediate concern revolves around the need for the early recruitment of posts to complete the set-up of the for DORA oversight functions, and the infrastructure and processes required to this end, and a question of how to fund these resources while no fees are being collected. In addition, the staffing of EBA's in certain critical policy or support areas (e.g. IT) as of the current establishment plans appears to be

	stretched despite the constant efforts of the authority to increase efficiency and redeploy resources. Redeployment of resources and reprioritisation of tasks means of course that work in other areas may have to be deprioritised, postponed or cancelled. An indication of areas that are likely to be affected had already been given in the Work programmes for 2023 and 2024, and similarly an indication for the draft 2025 work programme has been included in this document.
Other	The EBA may also be affected by decisions at institutional level to consider the enlargement of the EU and be called upon to assist the European Commission during the accession process. Furthermore the EU's Association Agreement with Andorra and San Marino will draw on the EBA's (and other ESAs) support in the implementation phase.

SECTION II - MULTI-ANNUAL PROGRAMMING (2025-2027)

1. MULTI-ANNUAL WORK PROGRAMME

11. The EBA defines its triennial work programme on the basis of its existing and foreseeable mandates, as well as the outlook for the financial services sector. This section describes medium term, strategic priorities and areas of work for the authority, the actions envisaged to achieve the objectives, and how the progress in the achievement of the objectives will be monitored.

12. On this basis the EBA has slightly adjusted its five medium-term strategic priorities for the years 2025-2027:

The EBA's 2025-2027 priorities

13. These medium-term priorities will help structure the authority's work and keep sufficient focus internally over time. They will support its internal allocation of resources and sequencing of the work. While the EBA is committed to delivering in all its mandates, careful differentiation in how this will be done is also necessary. The fact that one mission or area of responsibility does not specifically appear in one of these priorities does not imply that it will not be discharged or that it is less important, but simply that the need for specific or added focus has become lesser. For example, the authority does not expansively cover convergence work or advice to the Commission among its objectives or priorities given that those aspects of its roles are considered to be well established.

14. These objectives should also facilitate communication with external stakeholders, and engagement with them in delivering on the activities involved.

15. It is noted that the priorities may need to be further refined as the year progresses in light of the current environment marked by a substantial uncertainty in economic outlook, persistent

inflation, market volatility and heightened geopolitical tensions. Hence a significant degree of flexibility is required to allow the EBA to respond swiftly to changes or new developments. Similarly, the European elections in 2024 and the priorities to be adopted by the new incoming European Commission may require adjustments to the EBA's work programme for the years under consideration.

1.1. Five priorities for 2025-2027

P1 – Finalise and implement an effective and proportionate Single Rulebook

16. The Single Rulebook and its effective and consistent application will remain at the heart of the EBA's activities. The authority will continue to work on the smooth implementation in the EU of the Basel III framework and will also contribute to review of the crisis management and deposit insurance framework.

17. The EU's revision of the CRR /CRD legislative framework set out just over 140 new mandates for the EBA to be delivered between 2024 and beyond. Delivery of these mandates will contribute to finalising the single rulebook, and also provide further opportunities to factor in proportionality considerations. However, with the number of mandates significantly higher than in the initial draft legislative proposal (by over 40%), and without any additional resources allocated within this particular context, the EBA is faced with significant challenges for the full and timely delivery of what is expected. Following the finalisation of the negotiations and ahead of the formal adoption of the final legislative framework, the EBA has provided a Roadmap[4] providing the sequencing of the mandates in line with their legal deadlines set out by the co-legislators and explains the EBA's approach to the mandates as per major areas. The Roadmap - the full list of mandates can be found in annex XIV - highlights some bottlenecks than could be expected in terms of resources both at the level of EBA staff and of CAs.

18. The EC's proposals for a strengthened Crisis management and deposit insurance (CMDI) framework, issued in April 2023, aimed to enable authorities to organise an orderly market exit for failing banks of any size and business model, including smaller players, drawing from lessons learned during from the first years of application of the existing rules. The EBA contributed to the preparation of the proposals through its responses to calls for advice, of which more may follow. The proposals foresee amendments to the Bank Recovery and Resolution Directive (BRRD), the Daisy Chain Act, the Deposit Guarantee Schemes Directive (DGSD) and the Single Resolution Mechanism Regulation (SRMR). The revised DGSD proposals aim to better protect depositors by further harmonising the standards of depositor protection across the EU. The draft proposals contain requirements for the EBA to issue standards on provisions and to report to the Commission on the framework's effective and harmonised implementation.

19. As part of the EU's action plan to establish the Capital Markets Union, the EBA will assist in delivering the Renewed Sustainable Finance Strategy and new EU regime for green bonds. Moreover, the review of securitisation regulation will aim to further strengthen the securitisation market and will build on the previous work of the EBA in this area. Of particular importance will

[4] https://www.eba.europa.eu/publications-and-media/press-releases/eba-publishes-roadmap-implementation-eu-banking-package.

be the focus on ensuring that the green transition will also be supported through securitisation and on developing an integrated European framework for covered bonds, based on high-quality standards and best market practices. The EBA is also expected to cooperate with the Commission on reports on the performance of the covered bond framework which are mandated in Article 31 of the Covered Bonds Directive to be submitted by 2024/2025. Also in that context, the EBA will continue work started on two calls for advice: one to support the revision of the Covered Bond Directive, and another on insolvency benchmarking.

20. Moreover, the planned CSDR and EMIR reviews, which include several mandates for the EBA to develop draft regulatory proposals, will impact the EBA's work programme for the years ahead. More specifically, the EMIR review proposals include proposals for the supervision of ISDA SIMM (Standardised Initial Margin Model) to come under the EBA's remit, posing additional challenges, and requiring additional resources.

21. In 2025-2027 the EBA will continue incorporating ESG risks in the framework for the EU banking sector, by delivering on mandates included in a number of EU regulations and directives, and those stemming from the European Commission's renewed Sustainable Finance Strategy, announced in July 2021 as part of the European Green Deal. This includes developing standards and labels, including sustainable bonds, loans and securitisations, as well as developing a framework for systemic monitoring of ESG risks.

22. In particular the review of the banking package includes a number of regulatory ESG-related mandates on: ESG risks management and supervision, prudential treatment of exposures, disclosures, supervisory reporting and stress testing. In accordance with the mandates, the EBA will be developing standards and guidelines for institutions and competent authorities, as well as advising the Commission on specific aspects.

23. The EBA will moreover continue contributing to European and international work on sustainable finance, as well as work towards fostering supervisory convergence when it comes to dealing with ESG risks.

24. Generally attention will be paid to possible ways to maintain and update the different parts of the rulebook. This will include considerations on how to rationalise, including ways to improve its accessibility and user-friendliness.

KPIs

	Indicator (and type)	Weight	Short description
A	Number of technical standards, GL, reports delivered (Outputs [5])	80%	Number of technical standards, GL and reports delivered on time stemming from the implementation of the risk reduction package and the implementation of the CRD VI / CRR III / BRRD III.
B	Number of technical standards, GL, reports delivered – ESG (Outputs)	20%	Number of ESG related technical standards, GL, reports and responses to CfA stemming from the mandates in the EU regulations and directives and from the renewed Sustainable Finance Strategy of the EC delivered on time.

	Baseline	Target 2025	Target 2026	Target 2027
A	80%	85%	90%	95%
B	80%	85%	90%	95%

P2 – Foster financial stability in an economy transitioning towards sustainability

25. For the period under consideration, the EBA will continue enhancing its framework for assessing financial risks in general, in order to be well equipped to identify and respond to evolving risks and accelerate the integration of ESG risks across the framework in particular. The current volatile geopolitical and economic circumstances and related uncertainty require substantial effort to track developments in and challenges to the financial sector, which are expected to last for the foreseeable future. In addition to possible impacts of adverse developments on the financial sector, implications for consumers are an important aspect of the EBA's considerations. The possible fall-out from threats to cyber-resilience represents another important risk to factor in. The EBA's efforts here will also be reflected in the stress test framework, where in addition to work on improving the current stress test approach, including top-down elements, greater consideration is given to tackling climate-change related risks –transition and physical – through adequate methodologies, data and scenarios. Discussions will assess how to deal with the stress test results in both the supervisory process (in line with the mandate of Article 98 of the CRD), and in the priorities for supervisory convergence. The availability of (currently limited) resources will be key to ensure progress in this area.

26. The lessons learnt from the 2023 EU-wide stress test helped to shape the framework and methodology for the 2025 exercise. In addition, the annual risk assessment report and regular risk assessment work is continuously enhanced. Different sequences are currently being

[5] According to the Annex to the Communication from the Commission on the strengthening of the governance of Union Bodies under Article 70 of the Financial Regulation 2018/1046 and on the guidelines for the Single Programming Document and the Consolidated Annual Activity Report, KPIs can focus on:

- Inputs – are the human and financial resources used and the time required to produce outputs;
- Actions – are the work carried out over a certain period of time, consuming resources and producing outputs in accordance with the objectives set;
- Outputs – are what is directly produced or supplied through the agency intervention and are identified based on its operational objectives;
- Results are the direct effects of interventions on the target groups;
- Impacts are the indirect or long-term effects of an intervention on the EU or global society that are, at least partly, expected to be influenced by agency intervention.

envisaged and will be further discussed to best take into account available expertise and resources over the period 2025-2027.

27. Furthermore, the EBA will continue incorporating ESG risks into its risk analysis and stress testing frameworks. Together with the other ESAs, the ECB and the ESRB, it will undertake a one-off joint climate scenario analysis across the EU financial sector, focused on the preparedness of the financial system to the transition to the 2030 goals. In parallel, the EBA will develop together with competent authorities an approach for regular EU-wide climate stress testing. The EBA may also work to develop guidelines on institutions' ESG stress test and joint guidelines with other ESAs on supervisory ESG stress test according to the mandates of the CRR/CRD.

28. The follow-up on the EC review of the macro-prudential framework will give rise to additional work for the EBA. A related aspect to cover in this context is an analysis of practices adopted by CAs, which so far had to be deprioritised due to resource constraints.

KPIs

	Indicators (and type)	Weight	Short description
A	Achievement of milestones ahead of the upgrade of ST methodology and development of a hybrid model (Outputs / Results)	40%	1. Approval of the revised EU-wide stress test framework by Q1 2024. 2. Design of the new ST methodology by end-2024. 3. Implementation of the revised EU-wide stress test framework for the 2025 exercise.
B	Development and execution of one-off and regular climate stress test (Outputs / Results)	40%	1. Development of one-off climate stress test and regular climate stress test. 2. Implementation of one-off climate stress test. 3. Implementation of regular climate stress test.

	Baseline	Target 2025	Target 2026	Target 2027
A	Work plan	100%	70% (preparation for 2027 exercise	100%
B:	Work plan	100% (of one-off climate stress test)	80% (of regular climate stress test)	100% (of regular climate stress test)

P3 – Enable an integrated reporting system for enhanced assessment and disclosure

29. Contributing the EU's supervisory data strategy, the EBA's own data strategy aims to extend the range of regulatory data collected in areas requested by the legislators, to enhance the way this data is compiled as well as the usability of underlying systems, and to strengthen analytical capabilities. Building on its data infrastructure (EUCLID), the EBA continues to develop data services and to share data and insights with internal and external stakeholders by launching a new platform for enhanced collaboration and to disseminate data. The latest technology innovations will be used to enhance EBA's analytical capabilities and to support oversight and supervisory functions.

30. Standards for timeliness and quality of data set by the authority aim to ensure that key information is provided to all stakeholders without delays and will help to further improve risk analysis and facilitate a broader dissemination and disclosure of bank data, including those

covered by Pillar 3. The strategy enhances the EBA’s assessment of the impact of regulatory reforms, with a special focus on proportionality and the possibility of analysing the effects on specific business models while reducing significantly the need for ad hoc data collections. It will also facilitate evidence-based policy analysis in the context of EU-wide debates on regulatory and supervisory matters.

31. The EBA continues its efforts follow-up on the feasibility study it undertook in accordance with its with Article 430c of the CRR for the development of a consistent and integrated reporting system for collecting statistical, resolution and prudential data. The EBA reporting framework already integrates prudential, resolution, payments and until AMLA is established and fully operational, AML/CFT reporting. Pillar 3 disclosures are also integrated, in consistency with supervisory reporting data, to further increase efficiency for reporting firms. The EBA Pillar 3 data hub will provide easy access to public to all prudential disclosures by banks. The EBA Pillar 3 data hub will also be connected to the European Single Access Point (ESAP) of all company disclosures.

32. The EBA will moreover continue promoting transparency and availability of ESG-related data with the ongoing development of relevant metrics and disclosure and reporting standards.

33. The EBA’s work moreover contributes to the EU Supervisory Data Strategy’s objective to modernise supervisory reporting by working on increasing efficiency of reporting processes and by maintaining the EBA data dictionary (DataPointModel 2.0) jointly developed with EIOPA. In this context it is expected that the EC may request the EBA to develop a common data dictionary and data sharing infrastructure. Work on building a common data dictionary for banking sector by the integration of prudential, resolution and statistical reporting will continue in order to further increase standardisation, by way of common definitions and avoidance of redundancies, but also enhanced data sharing, all with the aim to maximise efficiencies for public authorities and reporting institutions. The implementation and monitoring of the recommendations and measures that the EBA set out in the 2021 cost-of-compliance report for adoption over a five-year horizon will further promote efficient and proportionate reporting.

34. A more recent development that impacts and complements the EBA’s work, is the initiative included in the EC’s 2024 work programme aimed at cutting down reporting burden by 25% in many sectors, including financial services. If /once adopted the EBA will ensure it regularly reviews reporting requirements, remove any redundant or obsolete ones, and keep the reporting burden to a minimum, as well as to consider reusing existing data before introducing new requirements. Proposed changes to the EBA founding Regulation would help to facilitate the sharing of reported data between the ESAs, CAs, and with the EC, and, under certain conditions with other stakeholders. The initiative ties in with efforts the EBA has undertaken as part of the Cost of Compliance study recommendations and related follow-up actions, the EBA’s Integrated Reporting feasibility study action plan, its own data strategy, all aiming at increasing efficiency, data sharing, standardisation. Ongoing efforts to harmonise the data currently collected for supervisory benchmarking purposes with the data from common reporting would reduce the overall reporting burden and improve the quality of data on key supervisory parameters.

KPIs

	Indicators (and type)*	Weight	Short description
A	Timeliness of reporting (ratio) (Results / Impacts)	25%	From EUCLID: Accepted modules / Expected modules,by remittance date (T)+10 working days (wd).
B	Completeness of reporting (ratio, %) (Results/ Impacts)	25%	From EUCLID: Not reported / Expected templates,by remittance date (T)+10 wd.
C	Accuracy of reporting (ratio, %) (Results / Impacts)	25%	From EUCLID: Failed error rules / Total of error rules executed against the received file, by remittance date (T)+15 wd.
D	Time to publication of Quarterly Risk Dashboard (nr days) (Results / Impacts)	25%	Working days from final remittance date of supervisory data (based on EBA's DC 404) to date of publication on EBA's webpage of RDB.
	* Indicators for robust data quality and timeliness are stable because with continuously increasing data scope and new reporting these remain relevant targets		

	Baseline	Target 2025	Target 2026	Target 2027
A	85%	> 85 %	> 85%	>85%
B	1%	< 1%%	< 1%%	< 1%
C	0.25%	< 0.25%	< 0.25%	< 0.25%
D	30	< 30	< 30	< 30

P4 – Implement DORA oversight and MiCAR supervision

35. Under the broader umbrella of the EC's priority for a Europe fit for the digital age The EBA contributes to the Digital Finance Package aimed at increasing the operational resilience of the EU financial sector. With the adoption of the Digital Operational Resilience Act and Markets in Crypto-assets Regulation, the EBA received new tasks and responsibilities, such as the oversight of critical ICT third-party providers under DORA, and the supervision of issuers of significant asset-referenced and e-money tokens under MiCAR, along with the requests to develop numerous Level 2 and Level 3 policy mandates. The new responsibilities require setting up supervisory/oversight functions involving new highly technical skills in the areas of innovative technologies, ICT and security risks along with closer cooperation with the other ESAs.

36. Specifically, for MiCAR, the EBA is working to deliver by end-Q2 2024 20 technical standards and guidelines (of which two are joint with ESMA, and one joint with ESMA and EIOPA). Additionally, the EBA is getting ready to be in a position to supervise from the beginning of 2025 issuers of asset-referenced tokens and e-money tokens that are assessed as 'significant' in accordance with the criteria set out in MiCAR, and to carry out other non-regulatory tasks such as issuing, at the request of NCAs, Opinions on the regulatory classification of crypto-assets. Significant preparatory actions are underway to ensure the EBA has in place the appropriate policies, procedures, forms, template, human resource and IT capabilities. A new Standing Committee on Crypto-assets will need to be established in order to facilitate the performance by the EBA of its supervision tasks in 2025.

37. DORA has established a new oversight framework for critical ICT third-party providers where each ESA will be assigned as Lead Overseer for specific CTPPs. The ESAs oversight role focuses on ICT risks which CTPPs may pose to financial entities and does not entail overseeing CTPPs across

their full range of activities. With the other ESAs, the EBA is working to establish oversight functions and the supporting methodologies to take on the related tasks, which are expected to start from the beginning of 2025. The preparatory activities include the setup of a cross-ESAs oversight team, the development of an oversight framework comprising policies and methodologies, building capacity, including upscaling skills of the existing staff and recruitment of ICT supervisors, development of relevant IT system and establishment of processes/mechanism to charge and collect oversight fees. The performance of oversight tasks, tied in with charging CTPPs oversight fees, will begin after the official designation of TPPs as critical has been made, with the latter also featuring high on the agenda. The preparatory activities are conducted jointly by the three ESAs in order to define a common oversight framework.

38. Preparations have been initiated in 2022 and continue into the first year of the 2025-2027 time horizon. A concern in this area revolves around the need for the early recruitment of posts to complete the set-up of the for DORA oversight functions, and the infrastructure and processes required to this end, and a question of how to fund these resources before fees are being collected.

39. More generally, the recruitment of fee funded resources is linked to uncertainties around the number of entities subject to be charged fees and a related risk that funds are insufficient to cover all staff costs.

KPIs

	Indicator (and type)	Weight	Short description
A	Delivery of policy mandates under DORA/MiCAR (Outputs)	30%	Delivery of policy mandates and consultation papers within the legally imposed timelines.
B	Operational readiness to take up new tasks under DORA and MiCA (Outputs / Results)	70%	As part of the DORA and MiCAR proposals, EBA should be ready to take up new tasks (supervision/oversight and others)-preparatory work for implementation of new tasks in line with the timeline and milestones of the internal project.
	The weight of the indicators has been adjusted to reflect the progress made with the delivery of the mandates. After 2025 KPI A will be replaced.		

	Baseline	Target 2025	Target 2026	Target 2027
A	Work plan	100 %	N/A	N/A
B	Work plan	Operational framework for DORA oversight, MiCAR supervision, and other activities	Fully operational framework for DORA oversight, MiCAR supervision and other activities	Fully operational framework for DORA oversight, MiCAR supervision and other activities

P5 – Focus on innovation for the benefit of consumers and ensure a smooth transition to the new AML/CFT framework

40. For the period under consideration, the EBA will focus on financial innovation, on the conduct of financial institutions, and on how this affects consumers, to find an appropriate balance between allowing financial institutions to seize opportunities arising from innovations and mitigating risks

arising for consumers and market confidence. From what follows, it is clear however, that the EBA's concerns for consumers go beyond the impact of conduct of financial institutions and innovation. In addition to consumer and depositor protection in the narrower sense the authority's efforts also cover payment services (and related fraud).

41. The EBA will continue its work on Artificial Intelligence (AI) and Machine Learning (ML), drawing on the outcomes of the preparatory and follow up work carried out in 2023 and to be continued in 2024. The finalisation of AI Act is expected to influence the work in this important area further and to provide a framework that creates room for opportunities all the while limiting risks to consumers.

42. The EBA will also continue to monitor industry developments and supervisory practices in financial innovation area, and foster knowledge sharing between supervisors via EBA committees and sub-groups, European Financial Innovation Forum and Supervisory Digital Finance Academy. Areas covered will include the use of innovative technologies for regulatory and supervisory purposes (RegTech, SupTech), artificial intelligence/machine learning, tokenisation, decentralised finance and other.

43. In relation to payment services, the EBA will work on new security, authorisation and consumer protection mandates expected to be conferred on the EBA under the forthcoming PSD3 and PSR which are part of the EC's retail payments strategy, and the regulatory framework on Open Finance. The fulfilment of such mandates will take account of the increased uptake by consumers of instant payments, after the revision of the separate SEPA Regulation. At this stage, around 35 mandates are estimated to be conferred on the EBA, for delivery between 2025 and 2027.

44. After delivery of the mandates conferred by MiCAR, the EBA will continue to monitor consumer and conduct of business issues arising from crypto-assets and work with NCAs to promote convergence in the transition phase leading to full application of the legislation. As many potential consumer protection issues are also investor protection issues, the EBA is working closely with ESMA on these tasks.

45. In the area of depositor protection, the EBA will fulfil the mandates conferred on the EBA under the proposals to revise the Deposit Guarantee Schemes Directive as part of the CMDI package. At this stage, the proposals foresee 10 such mandates (5 RTS and 5 guidelines) including improvements to the funding of deposit guarantee schemes, testing of the practical application of the framework, and improving ways to communicate deposit protection to customers, and information to be provided to consumers, to ensure that they are promptly and reliably informed and reimbursed in case their credit institution becomes insolvent.

46. It is noted that the Commission postponed the reviews of the Mortgage Credit Directive (MCD) and of the Consumer Credit Directive (CCD) until after the European elections. As a result, it is currently not confirmed that the EBA will receive additional mandates in these areas before 2028.

47. The EBA will, however, continue to identify consumer trends and also capitalise on its prudential work, by using prudential data to publish Retail Risk Indicators (RRI). The RRI will be incorporated

into the EBA's prudential risk assessment framework, thus establishing a single comprehensive EBA annual risk assessment exercise and resultant report (RAR).

48. The EBA will continue to deliver its AML/CFT mandate until AMLA is established and ready to assume its functions. This includes work to support AML/CFT competent authorities in their transition plans, and to provide technical advice to the Commission as necessary. The EBA will then transfer its standalone AML/CFT powers, mandates, reporting infrastructure and expert knowledge to AMLA. This will help ensure that AMLA can start operating efficiently, and that the EU's fight against ML/TF is not disrupted.

49. Identifying and tackling financial crime risks through prudential supervision is an essential part of maintaining the integrity of the EU's financial system and as such, will remain an important consideration for the EBA going forward. At the same time, AMLA will need to factor prudential considerations into its decision-making, so that the rules that apply to financial institutions and their supervisors are consistent and workable. Putting in place operational structures to facilitate close and continuous cooperation and information exchange with AMLA will be key to achieving this.

KPIs

	Indicators (and type)	Weight	Short description
A	Delivery of mandates conferred in sectoral legislation (Outputs)	40%	The EBA will deliver on mandates conferred under the revised Deposit Guarantee Schemes Directive (DGSD), the revised Payment Services Directive (PSD3), the new Payment Servies Regulation, and the new Open Finance Directive/Regulation.
B	Effective retail conduct supervision to enhance protection of consumers (Results / Impacts)	10%	The EBA will (i) carry out thematic reviews, (ii) coordinate national mystery shopping exercises, (iii) conduct peer reviews and (iv) take action in response to information provided through retail risk indicators and the EBA's Consumer Trend Reports; and/or (v) set up NCA supervisory cooperation fora.
C	Policy response and supervisory convergence in financial innovation (Results / impacts)	10%	The EBA will deploy its mandate in monitoring innovation, contributing to a common approach towards new or innovative financial activities, and in providing advice to the co-legislators, by: i) issuing number of thematic publications, incl. opinions or report issued to EC and NCAs; ii) fostering knowledge sharing via various platforms (EBA structures, EFIF, SDFA); iii) reviewing and verifying training curriculum of the SDFA (iv) Number of events organised to facilitate the exchange of information between NCAs.
D	Transfer of AML/CFT reporting infrastructure, methodologies and data to AMLA; establishment of cooperation channels (incl MoUs) (Outputs / Results)	40%	The EBA will work closely with competent authorities and the Commission to contribute to the smooth transition to the new EU AML/CFT framework. As part of the transition, it will hand over its standalone AML/CFT powers, mandates and reporting infrastructure to AMLA, and put in place the operational arrangements necessary to ensure that financial crime risks continue to be identified and tackled effectively and comprehensively, including through prudential regulation and supervision. This will include the establishment of cooperation and information exchange channels between the EBA and AMLA going forward.

* Adjustments have been made to KPI A (including targets) to reflect the focus on payment services and deposit protection mandates and the fact that the review of the MCD and CCD have been postponed. A new KPI E has been added to replace KPI D from 2025 onwards (as this will be completed by then) – with adjustment to weights.

	Baseline	Target 2025	Target 2026	Target 2027
A	70% of mandates	80%	90%	95%
B	>1 initiative	1 initiative	1 initiative	1 initiative
C	>1 initiative	Up to 3 initiatives 100 % reviewed materials for SDFA	Up to 3 initiatives	Up to 3 initiatives
D	Work plan	Preparation of transfer of EuReCA Completion of transfer of AML/CFT data and expert knowledge Establishment of cooperation channels with AMLA	Completion of transfer of EuReCA Ensure functioning cooperation channels with AMLA	Ensure functioning cooperation channels with AMLA

2. HUMAN AND FINANCIAL RESOURCES – OUTLOOK 2025-2027

50. The outlook for human and financial resource needs for years 2025-2027 is based on the situation of the Agency at the end of 2023, and takes into consideration the expected evolution of tasks for the period - with SDFA, DORA, MiCAR and AMLA - and the multi-annual financial framework.

51. The resources outlook reflects the following:

- SDFA: 1 TA/AD6 and 1 CA/FG IV till end of 2025.

- Digital Operational Resilience Act (DORA): DORA revised LFS provides for a total of 18 TA/ADs and 6 TA/ASTs for 2025 onwards. Based on the 1/3 provisional split, the EBA gets 6 TA/ADs and 2 TA/ASTs (of which one AST4 for IT that is EU/NCA funded from 2024 until September 2025 and then fee-funded), representing a total of 8 TAs, with an additional 2 CA/FG IV foreseen for 2025.

- Markets in Crypto-Assets (MiCAR): as per LFS, additionally to the 15 fee-funded TA/ADs allocated posts in 2023, the EBA is allocated another 3 TA/ADs fee-funded posts and 2 TA/AD EU/NCA posts, representing a total of 20 TA/AD posts in 2024. From 2025, the number of fee-funded TA/AD posts goes up to 20, representing a total to 22 TA/AD posts, while the EU/NCA funded posts remain unchanged. In 2024, the EBA also receives 2 CA/FG IV EU/NCA funded for indirect supervision tasks.

To allow for recruitment at appropriate levels, a full grade range for the DORA posts (such as 2 AD5 junior officer entry grade, 2 AD7 officer entry grade and 2 AD8 senior officer entry grade, 2 AST4 Senior Assistant entry grade) and a broader range than is currently foreseen for MiCAR would be needed.

- AMLA: from 2025, 4 TA/AD and 4 CA/FG IV posts are given to the new AMLA.

52. While the EBA acknowledges that no increase in post capacity is foreseen at present time beside the number of allocated posts for DORA and MiCAR, it must be noted that internal redeployment measures and leaning processes have been maximised. Hence, to deliver on the preparatory work necessary to establish a supervisory framework, the EBA may anticipate the use of fee-funded posts through the normal budget. This would be done either through savings, although given the increases in salary costs these are unlikely to arise, or through limited additional funding to cover the need for at least 3 posts for DORA oversight to complete the set-up of the functions.

53. Recruitments (jointly with ESMA and EIOPA for common profiles) may therefore be launched in 2024 to onboard staff in 2025 when the fees are in place to cover the salaries. Also, the EBA grade evolution over the three years would take into account the possibility of setting up a Joint Venture (JOV) project between the three ESAs in establishing a new structure for DORA.

2.1. Overview of the past and current situation

Human resources

Staff		2023 Year N-1		2024 Year N
ESTABLISHMENT PLAN POSTS	**Authorised budget 2023**	**Actually filled as of 31/12/2023***	**Occupancy rate % +**	**Authorised staff**
Administrators (AD)	151	149	99%	151
Assistants (AST)**	11	11	100%	11
Assistants/Secretaries (AST/SC)	-	-	-	-
SDFA***	1	1	100%	1
MiCAR****	15	-	-	20
DORA*****	6	-	-	6
TOTAL EP POSTS	**184**	**161**	**88% (99%)**	**189**
EXTERNAL STAFF	**FTE corresponding to the authorised budget**	**Actually FTE as of 31/12/2023 N-1**	**Execution rate % +**	**Authorised positions**
Contract Agents (CA)	50	49	98%	50
SDFA***	1	-		1
MiCAR****	-	-	-	2
DORA	-	-	-	-
Seconded National Experts (SNE)******	19	14	74%	19
TOTAL EXTERNAL STAFF	70	63	90%	72
TOTAL STAFF	**254**	**224**	**88% (96%)**	**261**

+ Percentages in brackets are showing the real occupancy rate without the MiCAR/ DORA posts that cannot be filled.

* Filled posts are commonly understood as also including offer letters sent and accepted.

** 11 AST standard allocation for 2023. In 2024, 1 AST4 for IT DORA recruited (EU/NCA funded from 2024 until September 2025, then fee funded). In 2025, 1 additional AST4 for DORA, representing a total of 13 AST.

*** 1 TA/AD6 from DG REFORM for SDFA (recruited in 2023) and 1 CA/FG IV from DG REFORM for SDFA.

**** 15 TA/AD posts for MiCAR. 2 CA/FG IV EU/NCA funded for indirect supervision tasks for MiCAR representing a total of 53 CAs for 2024.

***** DORA LFS provides for a total of 18 ADs and 6 ASTs for 2025 onwards. Based on the 1/3 provisional split, the EBA get 6 TA/ADs and 2 TA/ASTs (one of which is AST4 for IT recruited in 2024).

****** In addition, 13 cost free SNEs are hosted at EBA.

Financial resources

54. The execution of the EBA's **2023 budget** was impacted by difficulties in recruitment, as reflected in the human resources table above, and by delays in finalising guidelines for translation.

55. The **2024 budget** was prepared in line with 2023's initial and executed budgets, and by the funding provided to the EBA under the MFF. The BoS adopted the 2024 budget on 21 December 2023, for a total amount of EUR 56,633,074 including expenses funded by the French government contribution and by DG REFORM.

56. The table below shows the evolution of the EBA's expenditure by budgetary title and chapter. The 2023 figures include expenditure on projects and services (such as DRR, accounting services) subsequently recharged in part to other ESAs and commitments of assigned revenue, and exclude the execution on commitments carried over from 2022.

EXPENDITURE	**Executed budget 2023**	**Budget 2024**	*Note: EBA requested budget 2023*
Title 1 Staff expenditure	**34,082,857**	**36,859,936**	**33,515,237**
11 Salaries and allowances	29,739,222	31,924,700	29,575,823
- of which establishment plan posts	*24,282,622*	*25,641,545*	*23,507,443*
- of which external staff	*5,456,600*	*6,283,155*	*6,068,380*
12 Expenditure relating to staff recruitment	238,335	279,290	208,250
11.33 Employer's pension contribution	2,409,221	2,800,000	2,280,771
13 Mission expenses	84,951	87,241	34,518
14 Socio-medical infrastructures	749,206	844,111	819,737
15 Training	426,345	474,528	406,940
16 External services	291,451	341,866	179,698
17 Receptions and events	144,126	108,200	9,500
Title 2 Infrastructure & operating expenditure	**11,775,877**	**10,788,623**	**12,319,866**
20 Rental of buildings and associated costs [6]	4,235,112	4,775,177	4,148,361
21 Information and communication technology	6,504,839	5,007,371	7,112,580
23 Current administrative expenditure	609,170	594,371	654,295
24 Postage/telecommunications [7]	42,688	-	48,000
27 Information and publishing	384,068	411,704	356,630
Title 3 Operational expenditure	**5,808,178**	**8,984,516**	**6,842,451**
31 General operational expenditure	1,875,008	2,491,887	2,914,712
32 IT expenditure for operational purposes	3,933,170	6,492,629	3,927,739
TOTAL EXPENDITURE	**51,666,913**	**56,633,074**	**52,677,553**

2.2. Outlook for the years 2025-2027 (new and growth of existing tasks)

New or growth of existing tasks

TASKS	**DESCRIPTION**
Digital Finance package including MiCAR/DORA	The Digital Finance Strategy defines European priorities for the upcoming years in the digital area and translates to new mandates for the EBA in this regard. MiCAR establishes four schedules of regulation and supervision: crypto-asset service providers (other than issuers); issuers of systemic asset-backed or e-money tokens; issuers of other asset-backed or e-money tokens; and issuers of other crypto-assets. The legislation includes a significant number of policy mandates and associated highly technical impact assessments that the EBA is in

[6] Includes expenditure funded by the French government contribution.

[7] Included in Chapter 21 from 2024 onwards.

TASKS	DESCRIPTION
	the process of delivering and establishes supervision functions in relation to issuers of significant asset-backed and e-money tokens which are currently being developed with a view to being in place and performed in an industry-funded model by 2025. DORA consists of a regulation applicable to a wide range of financial entities with the aim to deepen the management of the digital risk dimension of the Single Rulebook in particular by: enhancing and streamlining the financial entities' conduct of ICT risks management; mandating a thorough testing of ICT systems; increasing supervisors' awareness of cyber risks and ICT-related incidents faced by firms; and introducing powers for supervisors to oversee risks stemming from financial entities' dependency on ICT third-party service providers. The legislation also foresees a new role for the EBA and other ESAs consisting in the oversight of critical third-party providers. This is currently being developed with a view to being in place and performed in an industry-funded model by 2025.
EU Supervisory Digital Finance Academy (SDFA)	The aim of the DG Reform-sponsored SDFA is to strengthen supervisory capacity in the area of innovative digital finance, thus supporting the objectives of the EU Digital Finance Strategy. The EU SDFA program [8] is organised for an initial duration of three years starting from late 2022: i) to disseminate knowledge on innovative applications of technology to financial activities to supervisors; and ii) to learn from supervisors' practical experience to inform the policy making process of the EC and the work of the ESAs. The three ESAs will design and deliver training, with funding from DG REFORM under a contribution agreement.
EU-wide stress test	Based on the EU-wide stress test carried out by the EBA in 2023 and the lessons learned, including from the introduction of top-down elements for Net Fee and Commission Income (NFCI), the EBA will be looking to assess its methodology for the 2025 exercise. As discussed further under 'Future ESG activities and mandates' hereafter, the EBA will also develop a climate stress test, including the one-off cross-sector climate stress test.
ESG activities and mandates	The renewed Sustainable Finance strategy by the EC is wide-ranging and ambitious. The EBA is contributing by developing ESG disclosures. Also, the ESAs reviewed E and S indicators via its RTS on ESG disclosures under SFDR to clarify indicators for both climate and environment-related principal adverse impacts and those in the field of social and employee matters, human rights, etc. The EBA will continue supporting the EC on the sequential review of the Article 8 Taxonomy disclosures and extension of the disclosure templates. The EBA will continue working on the extension of Pillar 3 disclosures on ESG risks as well as the development of supervisory reporting standards and templates in this area. To enhance risk management, the EBA expects to provide guidance on bank identification, measurements, management, and monitoring of ESG risks, as well

[8] https://ec.europa.eu/info/sites/default/files/b5_-_digital_finance_academy.pdf.

TASKS	DESCRIPTION
	as on risk-based transition plans. To foster supervisory convergence, the EBA will work on further guidance on incorporating ESG risks in the supervisory review and evaluation processes. After delivering the report on the prudential treatment of exposures subject to environmental and / or social risks and impacts on 12 October 2023, the EBA will conduct further work on specific aspects of the prudential framework, as requested in particular under the banking package. As regards standards and labels, after delivering its response to the CfA on green loans and mortgages in December 2023, the EBA may be required to further assist the EC on this topic or more broadly in developing standards for sustainable bonds and loans. Going forward, further work may be needed in the context of green and sustainable securitisation. In the area of stress testing, and in continuation to the first climate EU-wide pilot exercise on climate risk[9], the EBA is performing in coordination with the ESRB, ECB and the ESAs a one-off coordinated sectoral climate stress test. Moreover, the EBA will contribute to developing guidance on methods and scenarios for climate stress testing to be used by supervisors and supervised entities. The EBA will provide guidance on how institutions should test their resilience to climate change risk, and potentially also to broader ESG risks, and long-term negative impacts. With regard to ESG risk monitoring and identification, and in coordination with other EU entities and NCAs, a framework for systemic monitoring of climate-related financial stability risks including supervisory reporting will be developed. Last but not least, the ESAs were requested to assess the current supervisory and enforcement toolkit available to CA for monitoring, investigation and sanctioning greenwashing. Building on its progress report on greenwashing published on 1st June 2023, the EBA will further assess in a final report expected to be delivered by 31 May 2024 whether the regulatory framework is sufficiently efficient to identify and prevent greenwashing risks across the EU.
EMIR – supervision of ISDA SIMM	As parts of the planned CSDR and EMIR reviews, which include several mandates for the EBA to develop draft regulatory proposals, the EMIR review shapes up to include proposals for the supervision of ISDA SIMM (Standardised Initial Margin Model) which will pose further challenges, and will require additional resources.
Increase of mandates to develop regulatory products	The number of regulatory products that the EBA is being asked to develop as part of revised legislative frameworks continues to increase, with substantial implications on the authority's resources. This is the notably the case for the banking package, where the just over 140 mandates are now significantly higher (by about 40%) than the number foreseen in the initial draft legislative proposal, without any additional resources allocated.

[9] https://www.eba.europa.eu/eba-publishes-results-eu-wide-pilot-exercise-climate-risk.

TASKS	DESCRIPTION
	This is further exacerbated still by the c. 45 mandates expected to be conveyed on the EBA under the proposed PSD3, PSR, FIDA (Open Finance) and DGSD all of which would have to be delivered between 2025 and 2027. As a result the EBA will face significant challenges for the full and timely delivery of what is expected. This already had been the case in the wake of the adoption of the DORA and MICAR legislative framework and the slew of regulatory mandates the EBA had to develop without corresponding additional resources. Other reviews that are currently being negotiated, e.g. of the crisis management and deposit insurance framework, will only exacerbate the situation, and will require the authority to carefully decide how to prioritise its work.
Calls for advice and other ad hoc requests	The calls for advice that are currently expected will also add to the EBA's challenges. Although the authority, as in the past, is willing to adjust its work to deal with urgent requests by the co-legislators whilst delivering other core and additional mandates, the amount of known and expected mandates will not leave ample room for manoeuvre. In recent years , the EBA managed to address all calls (including unplanned ad hoc consultations), which gave rise to responses to six calls for advice in 2020, two in 2021, seven in 2022 and four responses to calls for advice in 2023. While work continues on calls that have been received and the planning aims to be cover those that have been announced and are expected, any additional unexpected requests may / will be more difficult to accommodate. Other ad hoc requests further add to the challenges and can take various forms, such as requests for technical advice, one-off analysis, data requests, or even requests for guidelines, as was the case for Guidelines on de-risking.

2.3. Resource programme for the years 2025-2027

Financial and human resources

58. The EBA's **revenue projections** stemming from the EU subsidy are set in the Multi-annual Financial Framework (MFF), which also determines the NCA contributions (see calculation model in Annex III). The French government contribution was agreed as part of the French bid to host the EBA in Paris. Revenue from DG REFORM is to fund the EBA costs of the Supervisory Digital Finance Academy (SDFA) that the three ESAs will run together over a three-year period from 2022 to 2025. The MiCAR and DORA proposals provide for a small number of additional posts and IT costs to be funded by the Union and NCAs, and a much larger number of posts to be covered by industry funding via fees levied on supervised entities. The figures in this document are in line with those proposed for in the latest revisions of the legislative financial statements for those legislations.

59. The table below presents EBA revenues over the period 2023-2027.

Revenue	2023 [10]	2024 [11]	2025	2026	2027
EU subsidy	19,428,306	20,774,871	20,071,829	20,284,866	20,689,764
NCA contributions: EU	31,479,331	33,878,222	32,896,407	33,274,161	33,944,556
NCA contributions: EFTA	974,592	1,048,861	1,018,465	1,030,160	1,050,915
French government	575,000	575,000	575,000	575,000	550,000
DG REFORM	214,772	356,119	329,939	-	-
Fees (MiCAR DORA) [12]	-	-	3,322,333	8,275,333	8,492,000
Total revenue	**52,672,002**	**56,633,074**	**58,213,973**	**63,439,520**	**64,727,235**

60. **The EBA's cost projections** for 2025 to 2027 are shown in the table below, with explanatory text in the subsequent paragraphs. The MiCAR and DORA figures are as per revised LFS, and are shown separately in order both to clearly identify them and to facilitate year-on-year comparison of the normal budget.

EXPENDITURE	Budget 2025	Budget 2026	Budget 2027
Title 1 Staff expenditure	**37,333,403**	**37,534,204**	**38,265,661**
11 Salaries and allowances	32,387,715	32,520,055	33,146,462
- of which establishment plan posts	*26,430,841*	*26,538,841*	*27,050,037*
- of which external staff	*5,956,874*	*5,981,214*	*6,096,425*
11.33 Employer's pension contribution	230,010	230,950	235,398
12 Expenditure relating to staff recruitment	2,875,000	2,935,000	3,000,000
13 Mission expenses	81,509	81,842	83,418
14 Socio-medical infrastructure	831,984	835,384	851,475
15 Training	492,120	494,131	503,649
16 External services	307,003	308,257	314,195

[10] Figures as per 2023 amending budget no. 2.

[11] EU subsidy as per Agency statement. NCA contributions increased to reflect increased pension costs.

[12] As per revised LFS.

EXPENDITURE	Budget 2025	Budget 2026	Budget 2027
17 Receptions and events	128,063	128,586	131,063
Title 2 Infrastructure & operating expenditure	**10,435,707**	**10,478,348**	**10,680,184**
20 Rental of buildings and associated costs	4,104,776	4,121,549	4,200,939
21 Information and communication technology	5,398,831	5,420,892	5,525,310
23 Current administrative expenditure	541,976	544,190	554,673
25 Information and publishing	390,124	391,718	399,263
Title 3 Operational expenditure	**7,122,530**	**7,151,634**	**7,289,390**
31 General operational expenditure	2,396,749	2,406,542	2,452,898
32 IT expenditure for operational purposes	4,725,781	4,745,091	4,836,492
TOTAL EXPENDITURE (excluding MiCAR/DORA fee-funded)	**54,891,640**	**55,164,187**	**56,235,235**
MiCAR fee-funded expenditure (per LFS)	2,629,000	5,722,000	5,809,000
DORA fee-funded expenditure (per LFS)	693,333	2,553,333	2,683,000
TOTAL EXPENDITURE	**58,213,973**	**63,439,520**	**64,727,235**

Budget for year 2025

61. The draft budget 2025 for the EBA is composed:

    (1) the resources foreseen for the EBA in the Multi-annual Financial Framework;

    (2) the resources foreseen for the Supervisory Digital Finance Academy, to be run by the three ESAs and fully funded by DG REFORM;

    (3) the resources foreseen for the EBA in the revised legislative financial statements (LFS) for MiCAR and DORA, funded by EU/NCA.

62. The EBA's assessment is that the resources envisaged by the MFF will make it challenging to deliver on its current and new activities in the years 2025-2027 i.e., DORA oversight and MiCAR supervision, but also high number of mandates assigned under the banking package and revised payments framework. In particular, for the establishment of the DORA oversight and MiCAR supervision functions additional resources would need to be mobilised in the form of additional funding, to allow for early recruitment of allocated fee-funded posts allocated for these new functions before corresponding fees can be charged, but also to allow for the recruitment of external staff (CAS and SNEs) on a temporary basis to deal with the high number of additional regulatory mandates. This is notwithstanding significant and continuing efforts aiming at internal redeployments of resources, efficiency gains and synergies. This situation is exacerbated by the significant increase in average staff costs in recent years, that has not been matched by an equivalent increase in funding. For example, EBA estimates that the average cost of a temporary agent will be 7.2 % higher in 2025 than in 2023.

63. To overcome this issue the EBA considers that it would require i) limited additional funding for 2024 and 2025 to allow for early recruitment of at least 3 FTEs for DORA oversight to complete the set-up of the functions – including infrastructure and processes –, and ii) 3 additional posts on a temporary basis (i.e. for 3 years) to be able to address the high number of additional

mandates introduced in the banking package compared to the initial legislative proposals. It is worth noting that such funding (of c. EUR 500,000 to 700,000 per year) through the EU/CA budget would allow to fill a gap after the authority had already reployed substantial internal resources, with this risk of slowing down or delaying other work.

64. For DORA resources the ESAs are exploring the possibility of joint selection procedures and, to pool resources in the form of a joint oversight venture ("JOV"). In any event the grade structure currently foreseen in the DORA Legislative Financial Statement should also be revised in the establishment plans for 2025 and subsequent years.

65. The above figures may be reassessed in case of further inflation/indexation.

Changes to budget lines

66. In 2023, the EBA carried out an internal review of its budget line structure. As a result of this review, and with the aim of simplifying budget management, the EBA is reducing the total number of budget lines. This is being done predominantly by removing budget lines that typically have a very low number of commitments. The most significant changes are:

- HR: the change reduces salaries and allowances budget lines to one per staff type i.e., temporary agents, contract agents, SNE, and trainees.

- Corporate support: budget lines for building costs have been reduced to two: one for costs deriving directly from the lease on the Europlaza building; the second for all other costs relating to the maintenance and operation of the building.

Staff costs (Title 1)

67. The EBA has assumed that posts funded by DG REFORM and MiCAR/DORA posts funded by EU/NCA will impact the budget in full in 2025.

68. The EBA has further assumed salary indexation of 2% for the year (on top of the 3.4 % indexation for the second semester of 2024, as indicated by DG BUDG in the 2024 budgetary circular issued on 14 December 2023), a salary correction coefficient for France of 119.5, and a pension contribution percentage of 11.7 %.

Administrative costs (Title 2)

69. The French government's contribution of EUR 575,000 will to be used to pay for the costs of the Paris building. The EBA will receive the contribution as external assigned revenue.

70. The EBA lease on the office space in the Europlaza building comes to an end in May 2028. Given the lead time for an office space procurement, which includes or may include: market research, lengthy specification and procurement processes, lease negotiations and legal advice thereon, European Parliament approval, office fit-out and physical move; the EBA expects to begin work on this in the second semester of 2024.

71. IT costs will continue to be driven, as envisaged in the EBA's IT strategy, by the continued operational costs of existing EBA products such as the collaboration platform, security operations centre, and the EBA website. In 2024 the EBA will invest in an HR digital transformation program, starting with the implementation of the European Commission's SYSPER system, and in addition will work on the replacement of the existing EBA document management system with a records management system that is more fit for purpose. The EBA will also focus on cost reduction possibilities resulting from the successful implementation of the cloudification project. Depending on the funds available over the course of the year, the EBA aims to continue work on the implementation of ServiceNow and intranet revamp.

72. In 2025, costs of membership of organisations such as CEPR and SUERF are included in Chapter 25 Information and publishing, which also includes press, periodical, and journal subscriptions.

Operational costs (Title 3)

73. The Chapter 31 general operating costs budget includes the costs of: developing and running training for external entities; EBA-hosted meetings (BoS and MB, Banking Stakeholder Group, standing committees, sub-groups and working groups); and EBA business travel. The EBA is budgeting for a similar level of physical meetings and travel as in 2024, while taking account of the EMAS targets on reductions of missions and in-person meetings by half compared to 2019.

74. Chapter 31 includes the cost of translations of guidelines, which for the EBA has always been a significant cost. Chapter 31 also includes subscriptions to data services - such as data on crypto-assets, ESG, and climate risk data - as well as ad-hoc data required for some consumer initiatives and FinTech work, and capital market data. Operational consulting is included in this chapter, and in 2024 is expected to include work on IFRS9, Pillar 3, DPM quality, and applications of AI/MLT.

75. The Chapter 32 information technology (IT) budget includes amounts for ongoing support and maintenance work on existing systems, and implementation of additional capabilities/new initiatives. The most significant element of expenditure will continue to be EUCLID, both maintenance and new initiatives (calculation engine, DPM refit, and Pillar 3 disclosures). There will also be significant costs for DORA and MiCAR systems, while work will continue on SAS development, EDAP,

2.4. Strategy for efficiency gains

76. The driver of the strategy for efficiency gains is to ensure organisational agility through internal structural adjustments when needed, increased alignment with higher-level strategies and goals, people development, increased shared services and digitalisation.

a) Internal structural adjustments

77. The 2021 reorganisation has increased EBA efficiency and effectiveness through a better alignment of the Agency's internal structure to the achievement of its key priorities and the EBA will continue to foster internal synergies in its wake.

78. The activities portfolio has been streamlined to 19 (compared to 37 in 2021 and 25 in 2022) with a systematic analysis of all the tasks contributing to those activities. A separate activity was introduced to capture the oversight and supervision at this juncture although this may be further considered going forward also with the changes in relation to AML-related activities. The reorganisation of EBA Standing Committees helped to improve efficiency and to support the focus on EBA strategic objectives. Further rationalisation is ongoing to reinforce the EBA work programme monitoring and workforce planning with the development of a new tool "THOR" (Tool for Handling Operations and Resources) which resulted in the migration of data from an Excel based solution into an Access Database provides for an improved and more user-friendly environment for task and resource planning functionalities. The Team Leaders role introduced in 2021 is entering into its second wave as a strong staff career development tool. The action plan developed following the Staff Engagement Survey of 2021-2022 is almost completed and a new Staff Engagement Survey is planned for Q1-2024. Active synergies have been actioned with ESAs and beyond with other EU Agencies through the EUAN (such as the staff swap programme between EBA/ESMA/EIOPA, theTask Force on Shared Services on the attractiveness of EU Employer, the ICT Academy aiming at identifying ways to attract young talents, and in particular, more women in ICT, etc.). Beside the effective implementation of the EBA internal mobility, an external mobility is to be adopted soon, completing the basis for staff deployment and career development.

79. The EBA's strategy for efficiency gains remains driven by the implementation of **new technology** in line with its IT strategy and the objective therein of becoming a digital agency. While these changes represent a substantial effort for the EBA ex-ante, it is expected that these initial investment costs will be fully recouped and allow the EBA to reap positive efficiency gains over a multi-year horizon. For instance, the implementation of a collaboration platform has reduced reduce email exchanges by 30–50% and has created more efficient processes. Development of an e-recruitment tool (with implementation expected in Q2 or Q3 2023), discussions around an automation of the Interactive Single Rulebook, and the use of electronic workflow tools in the area of Finance and HR are other examples.

80. For 2024 budgeting purposes, the EBA assumes that the COVID-19 pandemic will have been brought under control, allowing staff to work at the Paris premises and participate in external meetings, **albeit under an adjusted modus operandi, hybrid working arrangements and taking into account lessons learned from COVID-19 for the implementation of its EMAS-related greenhouse gas emissions reduction targets as per its EMAS registration** (see also Annex VII). Compared to the 2019 situation, this 'new normal' assumes that the EBA will organise 50% fewer meetings with externals at the EBA premises (thus also benefiting its members' own environmental footprints) and 50% fewer staff missions to external meetings. This 50% reduction will be maintained in subsequent years.

b) Joint procurements and external synergies

81. Generally, synergies will continue to be reaped from the collaborative approach adopted within the EBA and the CAs that support its work. This is not least reflected in the size and diversity. It will be beneficial in the context of MiCAR and DORA where challenges arising from new

responsibilities and mandates pertaining to novel and complex topics can be easier overcome through collaboration and coordination that allows the EBA and CAs to leverage off each other's knowledge and experiences.

82. In this context, it is worth reiterating the exploration by the ESAs in the context of the DORA resources of the possibility of joint procedures and, to pool resources – possibly in the form of a joint oversight venture (JOV).

83. In the area of procurement, the EBA systematically seeks to include other agencies in its procurement procedures. In 2023, the EBA was lead agency on four **inter-institutional procurement** procedures, with a total value estimated at EUR 6 260 232 in which a total of two other agencies participated. The EBA also participates in many inter-institutional procedures led by other EU entities, predominantly those run by the EC. Inter-institutional procurement is particularly strong with ESMA and the other Paris-based EU entities. In 2023, 73 % of the EBA's 177 framework contracts in force (resulting from 74 procurement procedures) were procured by other EU entities – see table below.

	EBA	COM	Other agencies	Other	Total
Procurement procedures completed Q3/2023	8	21	9	1	39
Framework contracts	49	80	37	11	177

84. The EBA will continue its **close cooperation with the other ESAs**. Cross-cutting work and issues of common interest are discussed in regular ESA meetings at senior management and technical levels, with a view to reaping all possible synergies. The EBA attends ESMA and EIOPA BoS meetings and cooperates in different workstreams and task forces at working level. The EBA's Directors and Heads of Units, especially in the area of Admin/Resources/Legal, have regular discussions with their peers at the other two ESAs and the SRB.

85. The **Joint Committee** of the EBA, EIOPA and ESMA with the EC and the ESRB is a key forum to discuss common regulatory issues and agree joint initiatives. Since its inception, the Joint Committee has successfully worked on numerous mandates. This will be taken to the next level with DORA.

86. A **shared accounting services** arrangement was established with ESMA in 2021 to enhance the synergies between the two Paris-based authorities has been further complemented by extending it to EIOPA, whereby EIOPA's accounting officer as a backup for EBA/ESMA accounting officer and vice versa.

87. EBA successfully onboarded a new **Security Officer** (SO) and was supported by the EIOPA SO who was *ad interim* covering for both agencies. The collaboration continued very closely as both Agencies jointly embarked in their Cloud Transformation programs to migrate to Public Cloud. This has further brought together the 3 ESA SOs to align and work together to collectively raise the level of security assurance and protection in very similar circumstances and with very similar tooling in the Azure Public Cloud. The 3 SOs continue to work together to best prepare their organizations for Cloud and for the upcoming security framework changes (i.e. Cybersecurity

Regulation, SNC in the Cloud policies, etc.). The three ESAs continue to evaluate a **shared security services** approach to optimize resource usage and synergise investments.

c) Other cross efficiencies

88. The EBA and EIOPA are currently working on a 'Data Point Model (DPM) Refit' and 'Digital Regulatory Reporting – tooling'. The authorities have found that they face similar problems and challenges with the expanding reporting framework and where both are already using very similar Data Point Models. These projects share resources and work together with the aim of improving technical tools to support supervisory reporting and address issues.

89. On the technology front, the EBA established in 2018 the **FinTech Knowledge Hub.** This forum brings together competent authorities in a common setting and enhances engagement with incumbent and new entrant institutions and other FinTech firms, technology providers and other relevant parties. Its aim is to enhance the monitoring of financial innovation, knowledge sharing about FinTech and to foster technological neutrality in regulatory and supervisory approaches on an ongoing basis. To date, the FinTech Knowledge Hub has hosted a series of events, leveraging on its registered contacts and wide spectrum of topics. The hub interacts with similar EU and national initiatives (e.g. the European Commission's FinTech Lab), covering the monitoring of the impact of FinTech on the whole financial ecosystem and supervisory knowledge sharing.

90. In the same vein, the ESAs established the **European Forum for Innovation Facilitators (EFIF)** further to the January 2019 Joint ESA report on regulatory sandboxes and innovation hubs which identified a need for action to promote greater coordination and cooperation between innovation facilitators to support the scaling up of FinTech across the single market. This forum provides a platform for supervisors to meet regularly to share experiences from engagement with firms through innovation facilitators (regulatory sandboxes and innovation hubs), to share technological expertise, and to reach common views on the regulatory treatment of innovative products, services and business models, overall boosting bilateral and multilateral coordination.

91. The **Supervisory Digital Finance Academy** is another upcoming cross-institutional initiative and a perfect example of how to maximise resources and avoid duplication. This initiative aims to strengthen supervisory capacity in the area of innovative digital finance by providing a systematic training program for the ESAs and for National Competent Authorities (NCAs).

92. Following the ESAs review, an **Advisory Committee on Proportionality (ACP)** was established to help identifying and achieving synergies. The ACP chairs and ESA staff convene regular meetings to discuss topics of common interest, such as environmental, social and corporate governance which is relevant to the three sectors.

d) Remaining uncertainties

93. As jointly stated in the ESA Chair Letter of 9 February 2021 to the EC[13] and subsequent assessments, the original DORA proposal does not provide enough resources to carry out the

[13] https://www.eba.europa.eu/sites/default/documents/files/document_library/About%20Us/Missions%20and%20tasks/Correspondence%20with%20EU%20institutions/2021/962943/ESA%202021%2007%20Letter%20DORA%20oversight.pdf.

tasks it envisages. Additionally, the fee-based funding model in the DORA proposal (i.e. fees collected by the critical third-party providers) covers only the ongoing costs of the oversight, not implementation costs.

94. Moreover, following the EBA's thorough assessment of the human resource requirements for MiCAR and DORA, and given the level of specialisation required for some of the tasks, the EBA sees a need to recruit staff at a range of grades and not only at AD5 level. The EBA supports the opening of opportunities for young and less senior staff for this new endeavour, but an overly strong focus on junior staff would not reflect the fact that the EBA will need to establish two new teams responsible for carrying out supervision and oversight functions, which will each need a team leader (AD7-9) and mix of staff with varying levels of experience and expertise, but certainly some experienced staff with highly specialist skills will be needed for the authority to be credible.

2.5. Negative priorities/ decrease of existing tasks

a) Reprioritisation / redeployment due to MiCAR and DORA

95. As mentioned before, resource constraints are becoming more acute with the MiCAR and DORA mandates, which only foresee (fee) funding for the oversight and supervisory related activities from 2025 onwards, without funding the organisational preparations and development of a substantial number of regulatory mandates in the years 2023 and 2024. Given uncertainties around the number of entities that can ultimately be charged fees there is a risk that cost of staff working on MiCAR and DORA will not be fully matched, and may have to be covered out of the existing budget, cover current -but also expanding- activities.

96. Resources needs for MiCAR and DORA for preparatory tasks, development of legislative and regulatory products, establishment of supervision/ oversight structures, IT infrastructure had to be covered by way of systematic internal redeployments and reprioritisation.

	2023			**2024**			**2025**		
FTE	**Total need**	**Reallocated**	**Gap**	**Total need**	**Reallocated**	**Gap**	**Total need**	**Reallocated**	**Gap**
DORA	**14.1**	11.1 (incl. 2 SNEs, 1 TA post reallocated to IT)	3	**16.5**	13.5	3	**7 (not covering direct oversight taks)**	4	3
MiCAR	**13.5**	13.5 (incl. 2 cost-free SNEs, 1 TA, 1 CA posts re-allocated to DFU)	0	**15.4**	15.4	0	**N/A**	N/A	N/A

97. The redeployment and reprioritisation means of course that work in other areas had to be deprioritised, postponed or cancelled. An indication of areas that are likely to be affected by this has already been given in the Work programme for 2023. The same exercise has been repeated for the draft 2024 work programme.

98. Similar considerations will have to be made given the number of regulatory products that the EBA is being asked to develop as part of banking package and the revised payments systems framework.

99. In addition, the staffing of EBA's in certain critical policy or support areas (e.g. IT) as of the current establishment plans remains stretched despite the constant efforts of the authority to increase efficiency and redeploy resources.

b) Decrease of AML/CFT-related tasks due to the establishment of AMLA

100. AMLA, once established, will take over those EBA powers and mandates that relate directly to AML/CFT supervisors and their sectors. Under the current proposal, the EBA will retain responsibility for tackling ML/TF risk through prudential supervision and contribute to the broader EU AML/CFT framework.

101. According to the EC plans, the AMLA is to be established in 2024 and commence its activities in the following year. It is foreseen that 8 of the EBA's AML-CFT current 12 posts will be transferred to AMLA. Before AMLA is set up, the EBA will work to make sure that the proposed handover of AML/CFT-specific powers and competencies from the EBA to AMLA is executed smoothly, and that disruption is kept to a minimum for competent authorities and for financial institutions. In this regard, the EBA is liaising with the EC to understand, and provide advice on, the modalities of the transition.

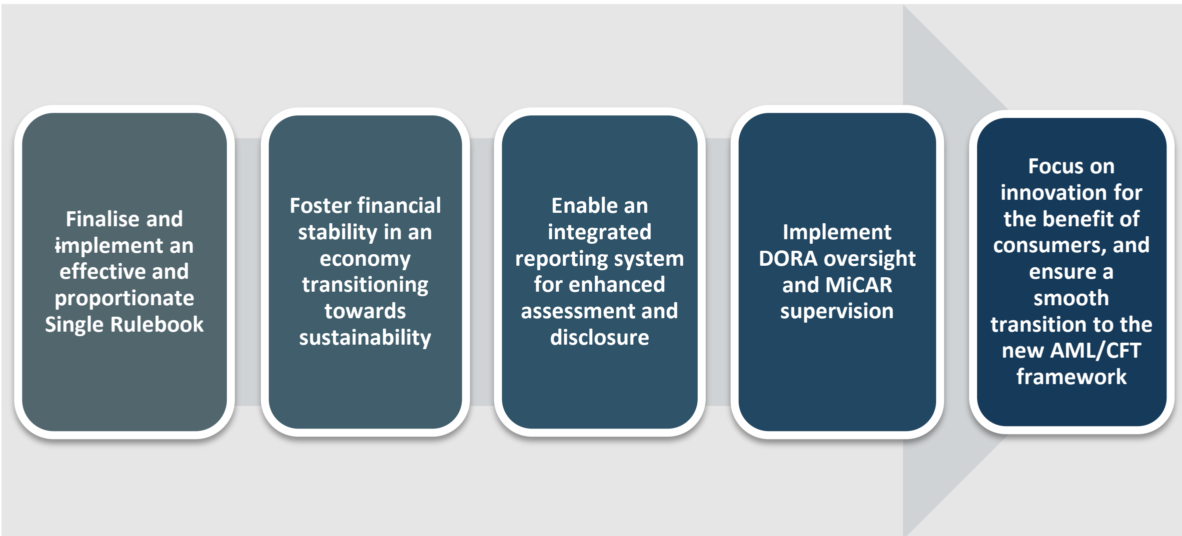
SECTION III - ANNUAL WORK PROGRAMME 2025

1. OVERVIEW

102. This section provides a preliminary view of the EBA's 2025 work programme. The priorities and work plan follow on from the multi-annual strategic priorities and planning, and furthermore take into account the Peer Review work plan and the Union-wide strategic priorities. Moreover, the programme will benefit from input from the Advisory Committee on Proportionality.

103. As noted in section II, the EBA defines its triennial work programme on the basis of existing and foreseeable mandates, and taking into consideration the outlook for the financial sector.

104. For 2025-2027, the EBA adopted five strategic priorities which broadly continue those of the previous programming document:

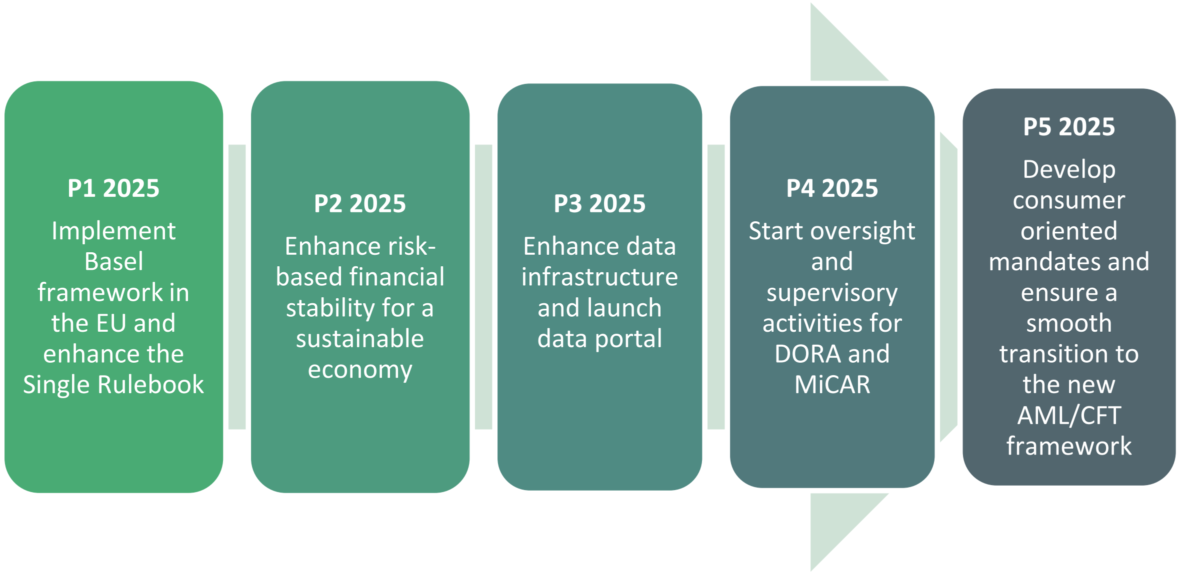


105. From these multi-annual priorities, the Authority derived its annual priorities and organised its activities and deliverables and resources in the form of a first draft work programme for 2025. For EBA staff, this draft work programme allows linking day-to-day work to strategic areas, whereas for the EBA's stakeholders it provides transparency and accountability. The EBA's work programme for 2025 will be finalised and endorsed by the EBA's BoS by 30 September 2024, based on a proposal of the MB and then published as an independent report.

106. As before, the priorities help the authority to structure its work and focus. They support the allocation of resources and the sequencing of the work, while the EBA is committed to delivering on all its mandates. The fact that one mission does not specifically appear in the priorities does not imply that it won't be discharged or that it is less important, but simply that it may require less specific or direct focus. This applies in particular, to well established areas such as work on convergence or advice to Commission.

2. THE EBA'S PRELIMINARY STRATEGIC PRIORITIES FOR 2025

107. Based on the above the EBA has set its preliminary strategic priorities for 2025 as follows:



108. In particular, the jitters in the financial markets in early 2023 have raised concerns about possible weaknesses in the global financial system and the risk of contagion for European banks. Moreover, the global macroeconomic outlook, driven by geopolitical risks heightened by the Russian war against Ukraine and, more recently, the Middle East crisis, as well as climate-related events led to economic repercussions being felt on a wider scale, high inflation and interest rates require an increased effort on financial stability assessment and monitoring by the EBA of EU financial institutions in general.

109. At the same time, much of the focus for 2025 will be on continuing the implementation of the Basel framework in the EU and on enhancing the Single Rulebook, as well as on monitoring financial stability and ESG sustainability by analysing risks and preparing for the 2025 stress test exercise. This will also be supported by the efforts to provide a data infrastructure that is at the service of stakeholders.

110. 2025 will mark the start of the EBA taking up of its new responsibilities for the oversight of ICT-third-party service providers and for the supervision of issuers of significant asset-referenced and e-money tokens. at the same time, the authority expects to transfer its specific AML-CFT related powers and mandates to the new EU AML/CFT Authority (AMLA). It will also put increased focus on innovation, consumers (incl. access to financial services).

111. Striving to deliver on the many mandates conferred to it by the EU legislators, the EBA's work and deliverables have been prioritised and scheduled, also taking in to consideration tasks stemming from the EBA's founding regulation as well as those reflecting ongoing legislative and regulatory work.

112. It is noted that the priorities may need to be further refined as the year progresses in light of economic developments, but also to reflect possible changes in the priorities of the EU institutions after the European elections in 2024.

2.1. P1 2025 – Implement the Basel framework in the EU and enhance the Single Rulebook

113. The EBA will prioritise its contribution to the timely and faithful implementation of the outstanding Basel III reforms in the EU to ensure banks can withstand future crises and to preserve a proper functioning of the European and global financial systems. This reform will strengthen the regulatory framework by introducing more risk-sensitive approaches for determining capital requirements, and address shortcomings in the existing framework, including through an 'output floor' which will serve as a backstop for the use of internal models. At the same time, this will contribute to completing the Single Rulebook in banking.

114. The negotiations on the CRR/CRD package were completed in late 2023 and the revised framework includes just over 140 mandates for the EBA to develop regulatory standards, guidelines and reports. Many of those will be delivered in 2025 (after publication of consultation papers in 2024). Ahead of the formal adoption of the final legislative framework, the EBA's Roadmap[14]– the full list of mandates can be found in annex XIV – sets out the sequencing of the mandates in line with the deadlines set out by the co-legislators and explains the EBA's approach to the mandates as per major areas.

115. In the context of the CRR/CRD package the EBA will take into consideration the recommendation of the ACP to ensure that the regulatory products and guidance it delivers are drafted in a way that is consistent with and uphold the principle of proportionality, reduce compliance costs without damaging the prudential objectives. The ACP views that the development of RTS, ITS, GL and Q&As could reflect proportionality by (i) setting different scopes, (ii) aiming for less complex regulation, (iii) using easy language and (iv) having the implementation impact for small and medium-sized banks in mind. In particular the ACP recommended that the EBA further addresses proportionality in the credit risk framework given its relevance for banks' balance sheets regardless of size, range of activity and level of complexity.

116. The European Commission's renewed Sustainable Finance Strategy, announced in July 2021 as part of the European Green Deal and the banking package confer a number of regulatory ESG-related mandates on the EBA: ESG risks management and supervision, prudential treatment of exposures, disclosures, supervisory reporting, stress testing, standards and labels, including sustainable bonds, loans and securitisations, as well as development of a framework for systemic monitoring of ESG risks. For 2025 the work on prudential treatment of exposures will remain one focal point.

117. As noted, the EBA is expected to cooperate with the Commission on reports on the performance of the covered bond framework which are mandated in Article 31 of the Covered Bonds Directive to be submitted by 2024/2025. Also in that context, the EBA will deliver its

[14] https://www.eba.europa.eu/publications-and-media/press-releases/eba-publishes-roadmap-implementation-eu-banking-package.

responses on two calls for advice: one to support the revision of the Covered Bond Directive, and another on insolvency benchmarking.

118. The mandates for the EBA to develop draft regulatory proposals as part of the planned CSDR and EMIR reviews may impact the EBA's work programme for 2025. In particular, proposals in EMIR foreseeing the supervision by the EBA of ISDA SIMM (Standardised Initial Margin Model) will be challenging here, and will require additional resources.

119. The EBA will more generally look into ways to maintain and update the different parts of the rulebook with consideration given to rationalising it, and improving its accessibility and user-friendliness.

120. For the development of the Single Rulebook, in all areas, the ACP also recommended the EBA ensures that proportionality considerations remain at the core of impact assessments that accompany the regulatory products and guidance.

KPI

	Indicator (and type)	**Weight**	**Short description**	**Target**
A	Number of technical standards, guidelines, reports delivered (Outputs)	80%	Number of technical standards, guidelines and reports, most including analytical impact assessments, delivered on time stemming from implementation of the or CRR III / CRD VI / BRRD III.	85%
B	Number of technical standards, guidelines, reports delivered – ESG (Outputs)	20%	Number of ESG-related technical standards, guidelines, reports and responses to CfA, most including analytical impact assessments, stemming from the mandates in the EU regulations and directives and from the renewed Sustainable Finance Strategy of the EC delivered on time.	85%

2.2. P2 2025 – Enhance risk-based financial stability for a sustainable economy

121. Within this priority, an increased focus will be put on the impact of higher for longer interest rates on the real economy in general and the banking sector in particular, in a context of persistent inflation and possible credit crunch due to a tightening of credit standards and risk adverse behaviour. With the current unstable geopolitical and economic circumstances heightened efforts to tracking developments in and challenges to the financial sector (which also include cyber-resilience) may need to be sustained for the foreseeable future.

122. Work on building the EBA's ESG risk monitoring framework, to be able to efficiently monitor ESG risks – transition and physical risks -in the financial sector as well as the development of the green financial market, had to be postponed, but is now expected to resume and to be completed in 2025. This foresees the gradual increase of use of external ESG risk relevant data with a focus on environmental risks.

123. The EBA monitoring of financial / ESG risk and supervisory priorities are informed by the EU-wide stress test run in 2023 and will also benefit from the one-off climate scenario analysis for 2024 for which the methodology is currently being finalised. In addition, work will be undertaken to develop a regular climate stress test and guidelines on institutions' climate stress test.

Following the introduction of top-down elements for Net Fee and Commission Income (NFCI) in the 2023 EU-wide stress test exercise and the lessons learned, the EBA continues to assess the need for changes to its methodology for the 2025 exercise. In particular the work on the methodology, including expanding the top-down elements, would require further resources. The ACP recommended in this context that the EBA reflects on introducing supplementary proportionality considerations in its stress test work.

KPI

	Indicator (and type)	**Weight**	**Short description**	**Target**
A	Achievement of milestones ahead of the upgrade of ST methodology and development of a hybrid model (Outputs / Results)	40%	1. Approval of the revised EU-wide stress test framework by Q1 2024. 2. Design of the new ST methodology by end-2024. 3. Implementation of the revised EU-wide stress test framework for the 2025 exercise.	100%
B	Development and execution of one-off and regular climate stress test (Outputs / Results)	40%	1. Development of one-off climate stress test and regular climate stress test. 2. Implementation of one-off fit-for-55 climate scenario analysis. 3. Implementation of regular climate stress test.	100%

2.3. P3 2025 – Enhance data infrastructure and launch data portal

124. Contributing to the EU's Supervisory Data Strategy, the implementation of the EBA's own Data Strategy will improve the way regulatory data is acquired, compiled, used, and disseminated to relevant stakeholders, and will strengthen the authority's analytical capabilities. The EBA will continue to leverage on its EUCLID platform to enable data flows between diverse endpoints and provide access to high-quality, curated data and insights to internal and external stakeholders by employing more advanced technical capabilities, with the objective to foster the ingestion and dissemination of critical data assets, insights and analytics policies as well as to go-live with the Pillar 3 data hub requested by the level 1 legislation. The EBA dissemination platform will be further expanded to new data sets. The EBA reporting framework and EUCLID scope will cover also new scope of entities with DORA and MiCAR reporting.

125. In 2025 the EBA will finalise implementation and transition to the improved data point model and methodology (the DPM standard 2.0) to ensure the EBA data dictionary is fit for future challenges of reporting and digital processing. The EBA will start producing reporting frameworks, including the DPM releases, the full validation rules lifecycle, the support of data calculations and the creation of XBRL taxonomy packages with the DPM Studio. Both the DPM standard 2.0 and DPM Studio were developed jointly with EIOPA. In the context of its work on Reporting and Transparency the EBA will duly consider the proposals that the ACP deems critical from the perspective of proportionality and with a view to a reduction of the reporting burden and the cost of compliance.

126. The initiative in the EC's 2024 work programme aimed at cutting down reporting burden by 25% in many sectors, including financial services will, if / once adopted also impact and complement the efforts the EBA has embarked on as part of the Cost of Compliance study

recommendations and the EBA's Integrated Reporting feasibility study action plan, all aiming at increasing efficiency, data sharing, standardisation.

KPI

	Indicator (and type)	**Weight**	**Short description**	**Target**
A	Timeliness of reporting (ratio %) (Results / Impacts)	25%	From EUCLID: Accepted modules / Expected modules, by remittance date (T)+10 working days (wd).	>85%
B	Completeness of reporting (ratio %) (Results / Impacts)	25%	From EUCLID: Not reported / Expected templates,by remittance date (T)+10 wd.	<1%
C	Accuracy of reporting (ratio %) (Results / Impacts)	25%	From EUCLID: Failed error rules / Total of error rules executed against the received file, by remittance date (T)+15 wd.	< 0.25%
D	Time to publication of Quarterly Risk Dashboard (nr days) (Results / Impacts)	25%	Working days from final remittance date of supervisory data (based on EBA's DC 404) to date of publication on EBA's webpage of RDB.	< 30

2.4. P4 2025 –Start oversight and supervisory activities for DORA and MiCAR

127. DORA entered into force on 16 January 2023 and will apply from 17 of January 2025. MiCAR entered into force on 29 June 2023 with the date of application ranging from 12-18 months following entry into force. By 2025 the EBA expects that, together with the other ESAs (where necessary), it will have delivered the policy mandates foreseen in MiCAR and DORA, in most cases including technical and analytical impact assessments, and thereby having contributing to the digital risk management dimension of the Single Rulebook and to a consistent framework for the regulation and supervision of crypto-asset activities.

128. Regarding DORA the ESAs will be getting ready to take up their new roles and tasks, with 2025 being the first year when the ESAs determine – sufficiently early - the scope of ICT third-party providers (TTPs) to be included in the scope of oversight by designating Critical TTPs, before starting oversight activities. In particular, the EBA will need to be ready early to start oversight activities over critical TPPs for which it will be assigned as a Lead Overseer.

129. All the preparatory work for the effective start of the oversight activities would be largely completed in 2024 but may carry over into early 2025. In 2025 the EBA will continue building a new IT system to support the EBA's oversight function. Following the establishment in 2024 of relevant oversight processes and the core methodologies, the performance of oversight tasks, tied in with charging CTPPs oversight fees can begin after the official designation of TPPs as critical has been made. The building of operational and ICT risk capacities internally will benefit from in-house trainings and leverage on the EU Supervisory Digital Finance Academy and other available trainings on oversight techniques, policies and procedures. In order to complete the set-up of the for DORA oversight functions, and the infrastructure and processes required to this it will be essential to enable the timely recruitment of posts foreseen, even if fees not yet being collected.

130. For MiCAR, after developing the common single rulebook for issuers of asset-referenced tokens and e-money tokens and provision of related services, and the completing the preparatory work for the commencement of the supervisory activities (including supervisory

policies and procedures and forms, templates for the exchange of information between all relevant parties (including supervised issuers, national competent authorities, the ECB and other relevant central banks), a supervisory handbook and building up IT capabilities) the EBA will need to be ready from beginning of 2025 to supervise issuers of significant asset-referenced and e-money tokens. A new Crypto-Assets Standing Committee (to be set up in early 2025) will facilitate the performance of supervision tasks. The commencement of the supervisory activities will benefit from special emphasis that the EBA places in 2024 on promoting supervisory convergence in the area of crypto and MiCAR authorisation and supervision across the authorities through a dedicated Crypto Coordination Group, and also strengthening supervisory capacity-building, in particular by further extending training for staff, and by organising workshops with NCAs on techniques for the supervision of issuers of asset-referenced and e-money tokens. In addition to the direct supervisory powers, the EBA will be responsible for monitoring of issued crypto-assets and exercise its product intervention powers under MiCAR allowing the EBA to prohibit or restrict activity related to ARTs or EMTs that do not meet MiCAR requirements. Also EBA at the request of NCAs will issue opinions on the regulatory classification of crypto-assets.

131. More generally, the recruitment of fee funded resources is linked to uncertainties around the number of entities subject to be charged fees and a related risk that funds are insufficient to cover all staff costs.

KPIs

	Indicator (and type)	**Weight**	**Short description**	**Target**
A	Delivery of policy mandates under DORA/MiCAR (Outputs)	30%	Delivery of policy mandates within the legally imposed timeline.	100%
B	Operational readiness to take up new tasks (Outputs / Results)	70 %	As part of the DORA and MiCAR , EBA should be ready to take up new tasks (supervision, oversight and other activities).	Operational frameworks for DORA oversight, MiCAR supervision and other activities

2.5. P5 2025 – Develop consumer oriented mandates and ensure a smooth transition to the new AML/CFT framework

132. In 2025, the new EU AML authority, AMLA, is likely to have been established and will be preparing to commence its activities. This means that the EBA will implement its transition plans to help AMLA operate efficiently from the start and contribute to making sure that the fight against ML/TF is not disrupted. At the same time, the EBA will put in place the operational arrangements necessary to cooperate effectively with the new authority, and to continue to tackle financial crime risks through prudential supervision and regulation.

133. The EBA will hand over its AML/CFT data, methodologies and reporting structures to complete the transition to the new legal and institutional AML/CFT framework. It will continue to provide expert advice on the functioning of the AML/CFT framework where warranted, and

work closely with the European Commission to support competent authorities' changeover plans.

134. The EBA will retain responsibility for ensuring the integrity of the EU's financial system. This includes a duty to identify and address financial crime risks from a prudential perspective. Through 2025, as it adjusts to its new role in the fight against financial crime, the EBA will therefore work to put in place the gateways and operational arrangements necessary to make the effective cooperation between prudential and AML/CFT supervisors and regulators possible going forward. This will be essential to ensure that the future AML/CFT and prudential regulatory framework is consistent and complete, and that it can be applied effectively by institutions and their competent authorities.

135. The EBA will further develop its focus regarding conduct of financial institutions, contribute to ensuring that citizens have access to financial and banking services, and concentrate on consumer protection mandates given by MiCAR and the Credit Servicers and Credit Purchasers Directive.

136. The EBA will continue to monitor financial innovation and identify areas where further regulatory or supervisory response may be needed. Crypto-assets, tokenisation in relation to new financial products and services and decentralised finance and the application of AI/ML in financial sector, as well as digital identities management are EBA's priority areas for further investigation in innovative applications. Also digital platforms, mixed-activity groups, supervisory and regulatory technologies (SupTech and RegTech) are examples of innovations that are currently on the EBA's innovation monitoring radar. By keeping a close eye on recent developments via targeted industry and competent authorities' surveys, information exchanged with industry, competent authorities and other EU and international organisations helps to identify emerging risks and opportunities for the industry, supervisors and the EBA and provide guidance on areas where further work by the EBA may be needed. EBA will support EC on work related to other topics related to digital finance.

137. In 2025, the EBA together with ESMA, EIOPA and the European Commission, will continue to support and finalise the activities of EU Supervisory Digital Finance Academy, with a view to strengthening supervisory capacity in innovative digital finance, and supporting the objectives of the EU Digital Finance Strategy.

KPIs

	Indicator (and type)	**Weight**	**Short description**	**Target**
A	Delivery of payment services, open finance and depositor protection mandates conferred n sectoral legislation (Outputs)	40%	The EBA will deliver payment services and depositor protection mandates conferred under the revised Deposit Guarantee Schemes Directive, the revised Payment Services Directive (PSD3), the new Payment services Regulation, and the new Open Finance Directive / Regulation (FIDA).	80%
B	Effective retail conduct supervision to enhance protection of consumers (Results / Impacts)	10%	The EBA will take action in response to information provided through retail risk indicators and the EBA's Consumer Trend Reports 2022/23.	1 initiative

C	Policy response and supervisory convergence in financial innovation (Results / Impacts)	10%	The EBA will deploy its mandate in monitoring innovation, contributing to a common approach towards new or innovative financial activities, and in providing advice to the co-legislators, by: (i) issuing number of thematic publications, incl. opinions or report issued to EC and CAs; (ii) fostering knowledge sharing via various platforms (EBA structures, EFIF, SDFA); (iii) reviewing and verifying training curriculum of the SDFA.	Up to 3 initiatives 100 % reviewed materials for SDFA
D	Transfer of AML/CFT reporting infrastructure, methodologies and data to AMLA; establishment of cooperation channels (incl MoUs) (Outputs / Results)	40%	The EBA will work closely with competent authorities and the Commission to contribute to the smooth transition to the new EU AML/CFT framework. As part of the transition, it will hand over its standalone AML/CFT powers, mandates and reporting infrastructure to AMLA, and put in place the operational arrangements necessary to ensure that financial crime risks continue to be identified and tackled effectively and comprehensively, including through prudential regulation and supervision. This will include the establishment of cooperation and information exchange channels between the EBA and AMLA going forward.	Preparation of transfer of EuReCA Completion of transfer of AML/CFT data and expert knowledge Establish-ment of cooperation channels with AMLA

3. ACTIVITIES IN 2025

138. In the following, the EBA sets out its activities and deliverables for the year 2024 in order to accomplish the aforementioned objectives.

139. The activities are presented under a streamlined approach, which is aimed to better deliver its objectives and to foster synergies across teams.

140. Across the 19 activities, the work programme comprises 290 tasks or mandates, of which 188 are of an ongoing nature and 102 are linked to specific delivery dates (given in terms of the quarter of 2025 that is targeted). For certain recently adopted legislations, such as the banking package, the mandates have not yet been individually reflected in this count as the delivery depends in most cases on the entry into force in the Official Journal.[15] When confirmed the number of mandates linked to specific delivery dates will increase significantly.

3.1. Policy and convergence work

Activity 1 – Capital, loss absorbency, and accounting

Contributing to priority	P1	Lead Directorate: Prudential Regulation and Supervisory Policy (PRSP) Lead unit: LILLAC
Objectives	1) Monitor implementation of regulatory provisions on capital and loss absorbency and provide related reports and guidance to all interested stakeholders. 2) Monitor developments of EU and international levels in the field of accounting and auditing standard setting; monitor the implementation of the main accounting standards like IFRS 9 and interactions with prudential requirements.	
Description	Robust quality of capital for the EU institutions and consistent implementation of the regulatory provisions stemming from the CRR and the regulatory technical standards developed by the EBA are the main objectives. The EBA will continue monitoring Common Equity Tier 1 (CET1) issuances and maintaining a public list of CET1 instruments. In addition, in order to monitor financial innovation and to keep the terms and conditions of issuances as simple as possible, the EBA will regularly engage in dialogue with numerous stakeholders to follow developments and provide guidance in the area of capital and capital issuances (AT1, Tier 2 and TLAC/MREL instruments in particular). Total loss-absorbing capacity (TLAC)/MREL is a requirement for a given bank to hold a sufficient amount of own funds and debt instruments of a certain quality in order to absorb losses and recapitalise the institution to ensure that it can continue to perform critical functions in the event of failure. This requirement is to be set for each bank at the parent and relevant subsidiary levels by the relevant resolution authorities, in line with both the BRRD and the regulatory standards developed by the EBA. In the context of the policy work on MREL, the EBA is performing a number of tasks, such as providing guidance and views on the documentation of issuances. To support high-quality accounting and auditing standards, the EBA monitors and contributes to regulatory developments at EU and international levels in the field of accounting and auditing standard setting, including developing guidelines and recommendations in areas where accounting may impinge on the prudential framework;	

[15] Indeed, the mandates in the banking package in most cases depend on the entry into force in the Official Journal, e.g. the deadline of a mandate will be 12, 18, 24 etc. months after entry into force of the banking package. For a few mandates, typically where a high priority is given to the mandates by co-legislators, a specific date is envisaged. For convenience, these have been expressed as a relative date in Annex (under assumption of Q2 2024 entry into force).

Activity 1 – Capital, loss absorbency, and accounting

more generally assess interactions between the accounting and prudential frameworks, including prudential consolidation.

Main output	*Capital and loss absorbency* • Maintenance of the EBA CET1 list and update of the CET1 report under article 80 CRR • Monitoring of – and report on – CET 1, AT 1 and T2 issuances (including for ESG purposes) • Analysis of interactions within loss absorbency requirements and stacking order, including comparison with international frameworks and analysis of management buffers from banks • Support on Q&A on capital and eligible liabilities instruments • Monitor of – and report on-- TLAC/MREL eligible liabilities issuances under Article 80 CRR, as well as for ESG purposes • Follow up implementation of the EBA Opinion on legacy instruments (in particular in the context of the CRR II grandfathering provisions) • Follow-up implementation of RTS on own funds and eligible liabilities (permission regime in particular) • Monitor the impact of the interest rate environment on own funds and eligible liabilities aspects (e.g. on the valuation of non-equity instruments) • Findings on stacking order and capital buffers *Accounting and audit* • Monitor and provide guidance where needed on the interaction between accounting standards and prudential requirements across the board, and including hedging aspects • Continue work on the modelling aspects of IFRS 9 and their related impact on capital, supporting proper appropriation by supervisors and continuous integration in the general benchmarking exercise • Monitor and promote consistent application of IFRS 9; monitor implementation by banks and supervisors of the recommendations on IFRS 9 implementation as contained in two EBA public reports • Continue working on / monitoring consolidation aspects • Monitor accounting standards and comment letters to the International Accounting Standards Board, where needed • Deliver regulatory products and technical advice requested by the Commission • Monitor the impact of the changes of the interest rate environment on accounting related aspects, including hedging aspects and strategies in relation to IRRBB and liquidity risks in particular • Support on QA on accounting and consolidation	Ongoing
	Capital and loss absorbency • Updated monitoring reports (CET1, AT1-*TLAC/MREL*) as far as needed, also depending on market developments, including where needed additional guidance on ESG capital and eligible liabilities instruments • Possible output (report?) on the EBA work on stacking order and capital buffers – output to be confirmed *Accounting and audit* • Report to the EU Commission on completeness and appropriateness of provisions on consolidation	TBC

Activity 1 – Capital, loss absorbency, and accounting

	• Final updated RTS on Own funds and eligible liabilities and RTS on methods of consolidation, where needed, depending on CRR III amendments • Final GLs specifying the activities that are a direct extension of banking, activities ancillary to banking, and similar activities • Possible update of the GLs on Expected Credit Losses (ECL) • Contribution to the IASB Dynamic Risk Management (DRM) project with a close interaction with concerned stakeholders	

Activity 2 – Liquidity, leverage, and interest rate risk

Contributing to priority	P1	Lead Directorate: Prudential Regulation and Supervisory Policy (PRSP) Lead unit: LILLAC
Objectives	1) Monitor implementation of regulatory provisions on liquidity, leverage risk and interest rate risk and provide related guidance to all interested stakeholders. 2) Continue engagement with stakeholders on measurement and definition of supervisory metrics/tests, in particular in relation to net interest income in the context of the EBA heatmap on IRRBB.	
Description	In the area of liquidity (also encompassing asset encumbrance-related matters), the EBA keeps the ITS on reporting up-to-date, following changes to the Level 1 texts in particular, and will continue to provide support to supervisors as needed so that they are well equipped to monitor liquidity risks in banks. In terms of implementation, the EBA is scrutinising the ways in which institutions and CAs have implemented the CRR and RTS provisions, for example in terms of notifications and the use of national options and discretions, using ongoing monitoring of the practical implementation and providing guidance where necessary. The EBA also reviews the follow up of the recommendations included in its monitoring reports, by banks and supervisors. The leverage ratio allows CAs to assess the risk of excessive leverage in their respective institutions. The EBA is working on regular updates of technical standards on reporting and disclosure of the leverage ratio where necessary. In terms of interest rate risk in the banking book (IRRBB) the EBA will continue to monitor the implementation of the regulatory products delivered in 2022 (one Guidelines and two RTS) and follow up on its close scrutiny plans on the impact of the new interest rate environment on IRRBB management and modelling underlying assumptions. In this context, the EBA will continue its reflections with stakeholders and implement short, medium and long term actions as communicated in its heatmap on IRRBB published end of 2023.	
Main output	*Liquidity risk* • Deliver regulatory products and update reporting liquidity requirements as needed • Monitor national practices on liquidity and national options and discretion, in particular monitoring the concrete implementation of the liquidity coverage ratio (LCR) rules and definitions • Monitoring of – and report on - LCR implementation and of previous EBA recommendations in this regard • Monitoring of interdependent assets and liabilities for the net stable funding ratio (NSFR) under Art. 428f of the CRR • Monitoring of interdependent assets and liabilities for the LCR under Art. 26 LCR DA	Ongoing

Activity 2 – Liquidity, leverage, and interest rate risk

	• Monitoring of notifications related to liquidity and follow-up actions • Update the list of credit institutions exempted from the 75% inflow cap under Article 33(5) of the LCR Delegated Act • Support Q&A on liquidity risk *Leverage ratio* • *Monitor/promote consistent application (incl. notifications and follow-up actions), update requirements as needed) +* • *Support Q&A on leverage ratio +* *Interest rate risk in the banking book* • Monitoring of the implementation of the RTS and GLs related to IRRBB and follow up on scrutiny plans • Support on Q&A on IRRBB	
	Liquidity risk • Lessons learnt exercise following March 2023 turmoil and in the context of international developments - possible additional reflections on liquidity metrics implementation and related accounting aspects *Interest rate risk in the banking book* • Lessons learnt exercise following March 2023 turmoil and in the context of international developments - possible additional reflections on IRRBB management and implementation and related accounting aspects • Possible updates of the regulatory products and any additional supervisory guidance as needed following the scrutiny plans, implementation of the regulatory package on IRRBB as well as the implementation of the action plan contained in the EBA Heatmap on IRRBB, including including development of complementary indicators and analytical tools for the assessment and measurement of IRRBB risks	TBC

+ Delivery of tasks marked with a + may be subject to review in light of redeployment of resources and reprioritisation that is required in order to address possible resource constraints. Tasks may be postponed, cancelled or undertaken with less intensive resource input.

Activity 3 – Credit risk (incl. large exposures, loan origination, NPL, securitisation)

Contributing to priority	P1	Lead Directorate: Prudential Regulation and Supervisory Policy (PRSP) Lead unit: RBM
Objectives	1) Deliver at least 80% of the number of technical standards, guidelines, reports and as set out below 2) Deliver EBA Roadmap on CRR III / CRD VI in line with timelines given therein – taking into consideration the recommendations of the ACP	

Activity 3 – Credit risk (incl. large exposures, loan origination, NPL, securitisation)

Description	The EBA's work on credit risk will focus on preparing the development of technical standards, GL and reports regarding the calculation of capital requirements under the SA and the internal ratings-based (IRB) approach for credit risk (excluding the trading book business) under CRR III / CRD VI, in accordance with the EBA's Roadmap on CRR III / CRD VI [16]– with the list of mandates in annex XIV – sets out the sequencing of the mandates in line with the deadlines set out by the co-legislators. The preparation of regulatory products and guidance will also take into consideration the recommendation of the ACP addresses proportionality in the credit risk framework given its relevance for banks' balance sheets regardless of size, range of activity and level of complexity, with particular focus as a starting point on the standardised approach for credit risk, while the proportionality related to the Internal ratings based approach (IRBA) could be addressed in supervisory discussions. In addition, it will continue its monitoring efforts on credit risk related issues, in particular through the EBA benchmarking exercise of internal models and the mapping of ratings from external rating agencies. On large exposures, the EBA will monitor the implementation of the regulatory products developed under the amended CRR II provisions and assess the need for updates based on CRR III final amendments. The EBA will continue to support strengthened loan origination and NPL management practices by contributing to implementation of the European Commission action plan for tackling non-performing loans (NPLs) and supporting the implementation of the directive on credit servicers and credit purchasers. Regarding securitisation and covered bonds, the emphasis will increasingly be on the prudential rules for the treatment of origination and holding of securitisation positions, in addition to monitoring the implementation of the covered bonds directive. In addition, legislative work may also be given to EBA, as part of the ongoing review of the securitisation framework.	
Main output	• Support the implementation of the Basel III credit risk framework in EU and deliver Basel III-related and other CRR/CRD mandates *Credit risk* • Maintain credit risk-related lists, including lists identifying the eligibility of public-sector enterprises and regional governments for the credit risk framework, and *mapping of ECAIs +* • Monitor and promote the consistent application of credit risk and credit risk modelling, including the implementation of the IRB roadmap and revisions of the CRR III / CRD VI *Loan origination* • Monitor the implementation of the EBA's loan origination GL *NPL* • *Follow up on the work and mandates in the NPL directive* + • Follow up on the EU action plan for tackling NPLs in Europe *Securitisation and covered bonds* • Monitor market development and promote the consistent application of frameworks on securitisation and covered bonds • Implement the Covered Bonds Directive, including monitoring reports • Support on Q&A on credit risk, large exposures, and securitisation and covered bonds	Ongoing

[16] https://www.eba.europa.eu/publications-and-media/press-releases/eba-publishes-roadmap-implementation-eu-banking-package.

Activity 3 – Credit risk (incl. large exposures, loan origination, NPL, securitisation)

	Credit risk • *2024 benchmarking report on IRB models +* *Securitisation and covered bonds* • Monitoring report on capital treatment of STS synthetics? • Monitoring report on collateralisation practices?	Q1
	Credit risk • *Preparation of 2026 benchmarking portfolios – update of ITS (including aspects related to IFRS9) +*	Q2
	Securitisation and covered bonds • Call for Advice on revision of Covered Bond Directive – final advice	Q3
	Credit risk • *Guidelines on methods for valuation+* • GL specifying the terms substantial cash deposits, appropriate amount of obligor-contributed equity, significant portion of total contracts and substantial equity at risk • GL specifying the methodology institutions shall apply to estimate IRB-CCF • RTS on criteria that institutions shall assign to off-balance sheet items *Large exposures* • Report on shadow banking - depending on final CRR III provisions. *CRR III / CRD VI Roadmap* • Deliver activity related mandates according to roadmap (as set out in annex XIV)	TBC

+ Delivery of tasks marked with a + may be subject to review in light of redeployment of resources and reprioritisation that is required in order to address the high amount of regulatory and other mandates. Tasks may be postponed, cancelled or undertaken with less intensive resource input.

Activity 4 – Market, investment firms and services, and operational risk

Contributing to priority	P1	Lead Directorate: Prudential Regulation and Supervisory Policy (PRSP) Lead unit: RBM
Objectives	1) Deliver at least 80% of the number of technical standards, guidelines, reports and as set out below 2) Deliver EBA Roadmap on CRR III / CRD VI in line with timelines given therein – taking into consideration the recommendations of the ACP	
Description	The work on market risk focuses on the development of technical standards, GL and reports regarding the calculation of capital requirements for market risk, credit valuation adjustment and counterparty credit risk (CCR). Market risk can be defined as the risk of losses in on- and off-balance-sheet positions that arise from adverse movements in market prices. From a regulatory perspective, market risk stems from all the positions included in banks' trading books, as well as from commodity and foreign exchange risk positions in the whole balance sheet. Introduction of the new market risk regime, as part of CRR III / CRD VI, builds on the previous implementation in CRR II and CRD V of the regime as an EU reporting requirement.	

Activity 4 – Market, investment firms and services, and operational risk

	Consequently, the 2019 EBA roadmap on the implementation of the FRTB [17] in EU continues to set out the EBA priorities in this area. The work on investment firms will focus on the finalisation of the remaining mandates stemming from the new regulatory regime for investment firms (IFR/IFD). In addition, the EBA's work in relation to operational risk focuses on the monitoring of regulatory operational risk requirements and preparatory work for the implementation of the new operational risk framework, the Standardised Measurement Approach, which is part of the final Basel III framework. Following the finalisation of the negotiations and ahead of the formal adoption of the final legislative framework, EBA's Roadmap on CRR III / CRD VI [18]– with the list of mandates in annex XIV – sets out the sequencing of the mandates in line with the deadlines set out by the co-legislators.	
Main output	• Regular updates to the list of diversified stock indices, including any additional relevant indices and applying the ITS quantitative methodology • Monitor and promote consistent application of market risk requirements, including the finalisation of phase IV in the EBA roadmap on the implementation of FRTB in EU • Support the implementation of the Basel III market risk, CVA and CCR framework, and operational risk in the EU • Delivery of Basel III-related and CRR/CRD mandates as regards FRTB, CVA, CCR and securities financing transactions • Monitor and promote the consistent application of operational risk and investment firms' requirements • *Work on market infrastructures (EMIR/CSDR-related) +* • Support on Q&A on market risk, market infrastructure and CCR, operational risk, and investment firms	Ongoing
	Market risk • 2024 benchmarking report on market risk models	Q1
	Market risk • *Preparation of the 2026 benchmarking portfolios – update of ITS +*	Q2
	Operational risk • RTS on the elements to calculate the Business Indicator components (BIC) • RTS on adjustments of the BIC • RTS on calculation of aggregated losses above 750k and unduly burdensome exemption? *Market risk* • Assessment of initial margin models? *Investment firms* • GL on benchmarking of internal models (IFR)? • Supervision practices for investment firms *CRR III / CRD VI Roadmap*	TBC

[17] https://www.eba.europa.eu/sites/default/documents/files/documents/10180/2844544/ab272ad0-f256-4d70-9563-376e1d772feb/EBA roadmap for the new market and counterparty credit risk approaches.pdf?retry=1.

[18] https://www.eba.europa.eu/publications-and-media/press-releases/eba-publishes-roadmap-implementation-eu-banking-package.

Activity 4 – Market, investment firms and services, and operational risk

	• Deliver activity related mandates according to roadmap (as set out in annex XIV)

Activity 5 – Market access, governance, supervisory review and convergence

Contributing to priority	P1	Lead Directorate: Prudential Regulation and Supervisory Policy (PRSP) Lead unit: SuRRR
Objectives	1) Monitor implementation of provisions on market access, governance, supervisory review and convergence and provide related reports and guidance. 2) Deliver at least 80% of the number of technical standards, guidelines, reports and as set out below 3) Deliver *EBA Roadmap on CRR III / CRD VI* in line with timelines given therein - taking into consideration the recommendations of the ACP	
Description	In 2025 the EBA will continue to work on the mandates that the CRD VI conferred concerning internal governance, new supervisory tools (assessment of acquisition of material holdings, assessment of material transfers of assets and liabilities, assessment of mergers) and the implementation of a new 3rd country branches regime, ensuring for this latter timely developments of the standards focusing on authorisation. The work will be carried out in accordance with the EBA's Roadmap on CRR III / CRD VI[19]– with the list of mandates in annex XIV – setting out the sequencing of the mandates in line with the deadlines set out by the co-legislators. The EBA will continue monitoring the regulatory perimeter and authorisation practices and the establishment of third-country branches and the Intermediate Parent Undertaking (IPU) framework. In the areas of governance and remuneration, Directive 2013/36/EU requires that institutions have robust governance arrangements, including a clear organisational structure; well-defined lines of responsibility; and effective risk management processes, control mechanisms and gender neutral remuneration policies, that includes specific requirements for risk takers (identified staff). Similar requirements apply to investment firms under Directive (EU) 2019/2034. The internal governance should be appropriate for the nature, scale and complexity of the institution or the investment firm. In the area of remuneration, the EBA is required in this context to monitor and benchmark remuneration trends and practices. The EBA is also asked to monitor and benchmark diversity practices at EU level. The EBA will monitor the implementation of the GL for the supervisory review and evaluation process (SREP)and with consideration, on the one hand to the recommendations made by the ACP in this respect, and on the other to the role of the ICAAP in the determination of the capital add-ons. This will also rely on the EBA's ongoing assessment of supervisory practices through the setting of the European Supervisory Examination Program (ESEP) and the monitoring of its implementation, also through the EBA participation in supervisory colleges. The EBA will continue work for the update of the SREP GLs also in light of the CRD VI and to ensure more articulated and proportional consideration of ESG and ICT risks, further clarifications related to IRRBB and CSRBB, possible update of the market risk section in view of FRTB, better coordination with the recovery plan. Where appropriate, efforts towards streamlining of the Guidelines will be made.	

[19] https://www.eba.europa.eu/publications-and-media/press-releases/eba-publishes-roadmap-implementation-eu-banking-package.

Activity 5 – Market access, governance, supervisory review and convergence

Main output	Support to Basel and FSB work • Monitor and promote consistent application of internal governance and remuneration requirements under CRD and IFD • Q&A on market access, internal governance and remuneration, supervisory review • Together with the other European Supervisory Authorities, establishment of a system for exchange of information regarding fit & proper assessments (Article 31a ESAs Regulation)	Ongoing
	SREP and supervisory convergence • Report on Convergence of Supervisory Practice and on colleges in 2024 (including European Supervisory Examination Programme) • 2026 European Supervisory Examination Programme	Q2
	CRR III / CRD VI Roadmap • Deliver activity-related mandates according to roadmap (as set out in annex XIV)	TBC

+ Delivery of tasks marked with a + may be subject to review in the light of the redeployment of resources and reprioritisation that is required in order to address the high amount of regulatory and other mandates. Tasks may be postponed, cancelled or undertaken with less intensive resource input.

Activity 6 – Recovery and resolution

Contributing to priority	P1	Lead Directorate: Prudential Regulation and Supervisory Policy (PRSP) Lead unit: SuRRR
Objectives	1) Monitor secondary legislation and identify areas for review 2) Monitor convergence in the implementation of identified topics of the resolution framework through the EREP	
Description	The authority will keep focusing on critical elements of the secondary legislation that may be in need of review on the basis of the practical experience gained and continue exploring transparency and disclosure topics, while adding possible work to increase the usability and flexibility of resolution plans, In this context consideration will also be given to earlier recommendations of the ACP on proportionality. Specific focus will also be devoted to the organisation of crisis simulation exercises, also considering the wider role foreseen for the EBA in the proposal adopted by the European Commission on the Crisis Management and Deposit insurance framework. The EBA will continue to monitor convergence in the implementation of identified topics of the resolution framework through the EREP (European Resolution Examination Program) exercise, developed in parallel to the similar exercise performed for the prudential framework. The EBA will continue to monitor the building up of MREL resources in the European banking sector. In the context of crisis preparedness, the EBA will continue to monitor evolving practices in relation to recovery planning, focusing in particular on improving the usability of the recovery plans also through appropriate testing, their content with specific focus on liquidity options and the determination of the overall recovery capacity and its interaction with SREP. It will maintain its focus on the crisis management continuum and on the quality of cooperation between supervisory and resolution authorities, with due consideration of proportionality as suggested by the ACP.	

Activity 6 – Recovery and resolution

Main output	• Work on recovery and resolution planning (including review of plans, operationalisation of resolution tools, resolvability assessment…) • Monitoring convergence in the area of resolution • Q&A on BRRD-related issues	Ongoing
	• Report on convergence in the area of resolution? • Report on European Resolution Examination Programme (EREP)2024 • 2026 European Resolution Examination Programme	Q3
	• ITS on resolution planning reporting (general review)? • RTS / GL on Early Intervention Measures (product to be decided)? • Review of RTS on content of recovery plans? • Transparency roadmap Resolvability?	TBC

Activity 7 – ESG in supervision and regulation

Contributing to priority	P1 P2	Lead Directorate: Economic and Risk Analysis (ERA) Lead unit: ESGR
Objectives	1) Deliver ESG-related technical standards, guidelines, reports and responses to CfA in line with prescribed deadlines - taking into consideration the recommendations of the ACP 2) Deliver on 2024 tasks of the EBA Roadmap on sustainable finance and conduct work on 2025 tasks	
Description	The EBA will continue to deliver on mandates included in the EU regulations and directives and those stemming from the Commission's renewed Sustainable Finance Strategy, as well as pursue its contributions to international work (particularly via the Platform on sustainable finance, Basel Committee, Network for Greening the Financial System). The EBA will continue building its ESG risk assessment tools to enable efficient monitoring of ESG risks in the banking sector and development of the green financial market, with a primary focus on environmental risks. The EBA will pay particular attention to maintaining the principle of proportionality when delivering these mandates, taking into considerations the recommendations of the ACP.	
Main output	• Deliver on the EBA Roadmap on sustainable finance • Fulfill the sustainable finance-related mandates received in EU regulations/directives • Responses to the Commission's requests to provide reports and advice on sustainable finance-related topics • Support for implementation of requirements, (in particular contributing to joint ESAs work on mandates under SFDR) • Support on Q&As on ESG issues • Building up ESG risk assessment and monitoring tools • Contributing to European and international activities in this area (including Platform on Sustainable Finance, BCBS Taskforce on Climate Related Risks, NGFS)	Ongoing
	• Annual report under Article 18 SFDR	Q3
	• Report on prudential treatment of exposures to environmental and/or social factors – final report • ESG risk assessment and monitoring tools	Q4

Activity 8 – Innovation and FinTech, RegTech and SupTech

Contributing to priority	P4 P5	Lead Directorate: Innovation, Conduct and Consumers (ICC) Lead unit: DF
Objectives	Monitor financial innovation and identify areas where regulatory or supervisory response might be needed in order to contribute to common supervisory approach fostering financial stability and protections of the consumers and providing advice to the co-legislators	
Description	The EBA will continue to monitor financial innovation and identify areas where further regulatory or supervisory response may be needed in order to promote consistency in regulatory and supervisory expectations. The EBA will also continue engaging with industry, competent authorities and other EU and international organisations to identify emerging risks and opportunities for the industry, supervisors and the EBA. The EBA will also identify areas and provide guidance on areas where further work by the EBA may be needed including from the perspective of fostering financial stability and protection of consumers. The EBA will conduct research and issue thematic publications to build knowledge, promote convergence, and identify regulatory gaps or obstacles relating to financial innovation. In the areas of common interest, the work will be carried out together with other ESAs in the context of the European Forum of Innovation Facilitators (EFIF). The work on innovation monitoring, FinTech and SupTech will also benefit the EBA own use of SupTech tools to facilitate the EBA oversight activities under DORA and supervision under MiCAR. To strengthen supervisory capacity in innovative digital finance, the EBA together with ESMA and EIOPA in partnership with the European Commission will be finalising activities of EU Supervisory Digital Finance Academy (SDFA).	
Main output	• Contribute to and foster common regulatory/supervisory approaches in digital finance topics (e.g. AI, supervisory technologies (SupTech), crypto-assets, distributed ledger technology, legislative initiatives related to other digital finance topics) through knowledge-sharing and awareness raising activities with EU and national competent authorities via the EBA FinTech Knowledge Hub (workshops, roundtables, seminars) and the European Forum for Innovation Facilitators (EFIF) • Identifying SupTech tools to facilitate the EBA oversight activities under DORA and supervision under MiCAR. • Activities based on work program of the EFIF for 2025 • Activities related to the EU Supervisory Digital Finance Academy • Follow up work related to the financial innovation priorities including tokenisation and DeFi, application of AI/ML in financial sectors, digital identities managements, including by clarifying supervisory expectations on specific use cases, where deemed necessary	Ongoing

Activity 8 continued – DORA

Contributing to priority	P4	Lead Directorate: Innovation, Conduct and Consumers (ICC) Lead unit: DF
Objectives	1) Finalise the policy mandates within the set deadlines and taking into consideration the recommendations of the Joint ESA ACP	

Activity 8 continued – DORA

	2) Complete preparatory work to take-up the new tasks conferred to the EBA/ESAs (oversight of critical third-party providers)	
Description	Based on the joint-ESAs DORA implementation plan, in 2025 the EBA together with the ESA will finalise the policy mandates form DORA according the to legislative deadline, in particular feasibility study on the EU-wide hub for ICT incidents reporting, and will continue with the implementation of the ESRB Recommendation on EU-SCFIF. Following the completion of level 2 and level 3 policy mandates the EBA will review and, if necessary, update existing guidelines that are affected by DORA. This work will start in 2024 and will continue through 2025. The EBA will continue to provide input to the work of international standard-setters in the area of operational resilience.	
Main output	• Set-up of oversight function under DORA and preparation of supporting documentation and processes • Set-up of other tasks under DORA, such as incident reporting and financial cross-sector exercises	Ongoing
	• Update of the GL on ICT risk assessment to align with DORA and integrate into SREP GL • ESRB recommandation on EU-SCICF[20]	Q4

Activity 8 continued – MiCAR

Contributing to priority	P4	Lead Directorate: Innovation, Conduct and Consumers (ICC) Lead unit: DF
Objectives	Completion of preparatory work to take-up the new supervisory tasks conferred to the EBA and execution of the task outside the direct supervision powers, including classification of crypto assets and product intervention.	
Description	In addition to the direct supervisory powers, the EBA will be responsible for monitoring of issued crypto-assets and exercise its product intervention powers under MiCAR allowing the EBA to prohibit or restrict activity related to ARTs or EMTs that do not meet MiCAR requirements. The EBA has to perform other tasks such as issuing opinions, at the request of NCAs, on the regulatory classification of crypto-assets. Looking beyond MiCAR, the EBA will continue its monitoring of crypto-asset market developments, including decentralised finance (DeFi) and crypto-asset staking and lending, with a view to continuing to promote consistency in regulatory and supervisory approaches across the EU and will assist EC for any follow up work related to MiCAR review. The EBA will also continue to provide inputs to the work of international standard-setters, including relevant workstreams of the BCBS, FATF and FSB.	
Main output	• Monitor crypto-asset markets and developments and assisting EC for any follow up work related to MiCAR review • Provide Opinions on classification of crypto-assets • Monitoring of issued crypto-assets and exercise its product intervention powers under MiCAR	Ongoing

[20] Recommendations of the European Systemic Risk Board on a pan-European systemic cyber incident coordination framework for relevant authorities (https://www.esrb.europa.eu/pub/pdf/recommendations/esrb.recommendation220127_on_cyber_incident_coordination~0ebcbf5f69.en.pdf).

Activity 8 continued – MiCAR

	• Promote convergence of authorisation and supervision practices through a Crypto Assets Standing Committee	

Activity 8A– DORA oversight / MiCAR supervision

Contributing to priority	P4	Lead Directorate: Innovation, Conduct and Consumers (ICC) Lead unit: DF
Objectives	1) Execution of oversight over Critical ICT Third-Party Providers (CTTPs) 2) Execution of supervision of issuers of significant asset-referenced tokens (ARTs) and E-money tokens (EMTs)	
Description	In accordance with DORA the ESAs will carry out oversight of CTTPs with the objective of the assessment of whether CTTPs have in place comprehensive, sound and effective rules, procedures and arrangements to manage ICT risks, which may be posed to the EU financial entities. The EBA will act as a Lead Overseer for a number of such CTPPs following the CTTP designation process that will start from beginning of 2025, and will be responsible for coordinating and carrying out oversight activities for such CTTPs, including on-site inspections and off-site investigations in accordance with the oversight plan. In accordance with MiCAR the EBA will supervise the issuers of significant asset-referenced tokens (ARTs) and E-money tokens (EMTs). These supervisory activities, including on-site inspections and off-site investigations will be carried out following the transfer of supervisory responsibilities from national competent authorities to the EBA and in accordance with the supervision plan.	
Main output	• Carrying out DORA oversight activities in accordance with the oversight plan • Carrying out MiCAR supervisory activities in accordance with the supervision plan.	Ongoing
	• Designation of CTTPs and appointment of Lead Overseer	Q2

Activity 9 – Payment services, consumer and depositor protection

Contributing to priority	P5	Lead Directorate: Innovation, Conduct and Consumers (ICC) Lead unit: COPAC
Objectives	1) Deliver consumer protection mandates from the Credit Servicers Directive and MiCAR 2) Take follow-up up action in response to the findings of the Consumer Trends Report 2022/23 on arrears and payment fraud and the EBA's retail risk indicators	
Description	The EBA contributes to efficient, secure and easy retail payments across the EU, by continuing to contribute to the common interpretation and supervision of the relevant EU Directives and Regulations, in particular the revised Payment Services Directive (PSD2), and the 12 mandates the EBA had developed in support of the Directive The EBA seeks to foster a consistent level of consumer protection in all EU Member States by identifying and addressing consumer detriment in the banking sector, monitoring and assessing the retail conduct of financial institutions in relation to the retail banking products in its regulatory remit, delivering the mandates conferred to it in EU law, and contributing to supervisory convergence and consistent consumer outcomes. As indicated under activity 3,	

Activity 9 – Payment services, consumer and depositor protection

	the EBA also continues to support the implementation of the Directive on credit servicers and credit purchasers, such as on complaints handling procedures and the maintenance of national registers. Furthermore, the EBA contributes to enhanced depositor protection by supporting the EU Commission, Council and Parliament in progressing the revised Deposit Guarantee Scheme Directive (DGSD) through the legislative process and prepares for the delivery in 2025/26 of the mandates expected to be conferred on the EBA. The EBA also contributes to depositor protection in the event of a bank failure, facilitates cross-border cooperation between deposit guarantee schemes (DGSs), and acts as a hub for DGS data collection and analysis, monitoring the financing and resilience of DGSs.	
Main outputs	*Payment services:* • Support on Q&As on PSD, EMD, and IFR; • Support the EU Commission, EU Council and EU Parliament during the negotiations of the revised PSD3/PSR and monitor evolution of mandates foreseen for the EBA; *Depositor protection:* • Monitor liquidations in the EU with a DGS pay-out; • Assessment of notifications received under DGSD; • Monitor the negotiations of the revised Deposit Guarantee Scheme Directive (DGSD), including the evolution of 10 mandates expected to be conferred on the EBA; • Answers to questions the EBA receives on DGSD through the EBA Q&A tool; *Consumer Protection:* • Support on Q&As on MCD, PAD and CCD	Ongoing
	Payment services: • Publish and assess most recent payment fraud data? *Consumer Protection:* Consumer Trends Report 2024/25 *Depositor protection:* • Peer review report of stress tests and resilience of national deposit guarantee schemes (initially foreseen for Q4 2024)	Q1
	Depositor protection: • Publication of 2024 data on uses of DGS funds, including on bank failures, and data on covered deposits and financial means available to DGSs *Consumer Protection:* • RTS on Information sheet from credit institutions to consumers • RTS on Information sheet from DGSs to consumers	Q2
	Depositor protection: • RTS on Transfers of DGS funds between DGSs • RTS on Client funds – criteria for assessing contagion • RTS on Methodology for performing the least cost test to determine how much DGS funds can be used in failure prevention • Guidelines on Reporting to the EBA of various pieces of information, such as triggering of unavailability of deposits, uses of DGS funds	Q4

Activity 9 – Payment services, consumer and depositor protection

	• Guidelines on Methods for calculating contributions to DGS funds (extending existing EBA GLs) • Guidelines on Cross-border payouts • Guidelines on delineation and reporting of AFM (codifying existing own-initiative GLs) • Guidelines on DGS stress testing (codifying existing own-initiative GLs)	
	Payment services: • Develop mandates assigned to EBA under revised payment services framework	TBC

Activity 10 – Anti-money laundering and countering the financing of terrorism

Contributing to priority	P5	Lead Directorate: Innovation, Conduct and Consumers (ICC) Lead unit: AML
Objectives	1) To work closely with competent authorities and the European Commission to finalise the transition to the EU's new legal and institutional framework . 2) To put in place the structures necessary to make close and continuous cooperation between prudential and AML/CFT authorities possible in the fight against financial crime.	
Description	Through 2025, the EBA will work closely with competent authorities and the European Commission to finalise the transition to the EU's new legal and institutional AML/CFT framework. As part of this, the EBA will transfer data, knowledge and powers to AMLA, provide technical advice to the European Commission as necessary and support national competent authorities in their preparatory work. The EBA will continue to set common regulatory expectations on tackling financial crime risks from a prudential perspective. To this effect, it will put in place the gateways and operational arrangements necessary to facilitate the effective cooperation between prudential and AML/CFT supervisors and regulators going forward. The AMLA is currently expected to be established in 2024 and to assume its functions from 2025. The EBA will adjust its work programme as necessary once the date of establishment is known.	
Main output	• Tackling ML/TF risk through prudential supervision – embedding ML/TF aspects in the prudential framework (CRD/CRR, PSD/PSR, MiCAR) • Technical advice to support the transition to AMLA • Supporting CAs' transition to AMLA	Ongoing
	• Transfer of the EBA's AML/CFT reporting infrastructure (EuReCA) to AMLA • Transfer of the EBA's AML/CFT data to AMLA • Transfer of EBA AML/CFT methodologies to AMLA • EBA financial crime strategy (TBC – possibly for 2024)	Q4

+ Delivery of tasks marked with a + may be subject to review as resources may be redeployed, and workstreams deprioritised, to accommodate work on the transition to the new legal and institutional framework. Tasks may be postponed, cancelled, or undertaken with less intensive resource input.

3.2. Risk assessment and data

Activity 11 – Reporting and transparency framework

Contributing to priority	P1 P3	Lead Directorate: Data Analytics, Reporting and Transparency (DART) Lead unit: RT
Objectives	Deliver at least 80% of the technical standards and other products as set out in the table below – taking into consideration the recommendations of the ACP.	
Description	In 2025, the EBA will continue its follow up on the feasibility study on integrated reporting and to contribute to a more consistent and integrated system for collecting statistical, resolution and prudential data, with a view to improving efficiency and reducing reporting costs for all relevant stakeholders. Ongoing efforts to harmonise the data collected for the supervisory benchmarking purposes with data from common reporting are expected to bring synergies, reduce the reporting burden and increase the quality of data on key regulatory parameters. The EBA will work with all relevant authorities to build a data dictionary, including a common methodology and structure (syntactic integration). Under the Joint Bank Reporting Committee (JBRC), to be established in 2024, the EBA will work with the ECB, the SRB, the Commission and national authorities and central banks on the integration of reporting concepts and definitions (semantic integration), and on the discussion of the level of granularity for the different types of reporting. The work on semantic integration under the JBRC will rely on the roadmap that the EBA and ECB are preparing. The EBA will continue to maintain a high-quality and efficient supervisory reporting framework, including a data point model based on DPM standard 2.0, and validation rules , to ensure that the reporting framework is relevant and supports authorities in fulfilling their obligations. Moreover, during 2024 the EBA will work on the implementation of the reporting changes driven by the revision of the CRR (CRR III) and CRD (CRD VI) and do the necessary amendments to the EBA reporting framework; the EBA will follow a two-step approach in CRRIII /CRD VI implementation (as set out in the EBA's Roadmap on CRRR III / CRD VI[21]– with the list of mandates in annex XIV), focusing in step 1 on the reporting necessary to monitor Basel III implementation and in step 2 on the rest. The EBA will continue to support stakeholders in the reporting process by addressing questions through the Q&A process. The EBA will continue its work to improve the comparability and standardisation of Pillar 3 disclosures, including the extension of the ITS on Pillar 3 to cater for the CRR III-led amendments, following as for reporting (and again in line with EBA's Roadmap) a two-step approach, with a first step focused on disclosures necessary for Basel III implementation and a second step for the rest. The EBA will continue to promote integration of Pillar 3 and reporting frameworks through the maintenance of the mapping tool. The EBA will continue to work on ESG disclosures in the context of the Pillar 3 ITS, and coordinate the work on non-financial reporting at the EU level with our consultative role on CSRD standards, and at international level with Basel. The CRR III proposal includes a mandate for the EBA to establish a Pillar 3 data hub, anticipated also on our Pillar 3 roadmap published in 2019, which will centralise public prudential disclosures for all EU institutions, in order to further promote comparability of public prudential information and market discipline and facilitate compliance with Pillar 3 requirements by smaller institutions. During 2024 the EBA will run a pilot with a small sample of large banks in order to test the tools for the hub and in preparation for its full implementation in 2025. Further, the EBA Pillar 3 hub is expected to connect to ESAP (European Single Access Point) which covers all company disclosures. The EBA work on the Pillar 3 data hub and on ESAP will be highly related.	

[21] https://www.eba.europa.eu/publications-and-media/press-releases/eba-publishes-roadmap-implementation-eu-banking-package.

Activity 11 – Reporting and transparency framework

	Last but not least, as part of the EBA work on proportionality, the EBA will monitor the implementation of its recommendations in virtue of the study of the cost of compliance. The recommendations of the ACP will be helpful here to guide the EBA's work. In the context of its work on Reporting and Transparency the EBA will duly consider the proposals that the ACP deems critical from the perspective of proportionality and with a view to a reduction of the reporting burden and the cost of compliance.	
Main output	• Regular update and maintenance of the supervisory and resolution reporting framework (legal act, templates, instructions and technical package) • Update and maintenance of the Pillar 3 framework • Follow-up of recommendations identified in the cost of compliance study, including the regular review of proportionality in reporting framework • Maintain validation rules, the data point model and XBRL taxonomies. • Continue with the development of the new tool – DPM Studio - to improve development and maintenance of data dictionary, including data-modelling, validations, transformations and data exchange formats creation • Implementation and maintenance of an integrated reporting system, following on from the EBA feasibility study on integrated reporting • Contribute to implementation of EU Supervisory Data Strategy across financial sectors • Maintain mapping tool between reporting and Pillar 3 • Opinions on sustainability reporting standards issued by EFRAG under CSRD • Development of the Pillar 3 data hub • Preparatory work on European single access point (ESAP), in coordination with ESMA and EIOPA • *Monitoring of Pillar 3 disclosures +* [22] • Support Q&A process on reporting and transparency frameworks • Continue our involvement in EU and international organisations, including EFRAG non-financial reporting body, BCBS DIS (Disclosure Expert Group) and BCBS TFCR – Workstream on disclosures	Ongoing
	• ITS to amend Resolution Planning reporting?	Q1
	• Amended ITS to extend to Pillar 3 - Extension of the scope (all institutions, other environmental, S and G)?	Q2
	• Final draft ITS amending FINREP reporting? • Specification of disclosure requirements for investment firms (including ESG risks, and beyond those specified in ITS)? • ITS on supervisory reporting - Implementation of CRR III / CRD VI changes (step 2) • ITS on Pillar 3 disclosures - Implementation of CRR III / CRD VI changes (step 2)	TBC

+ Delivery of tasks marked with a + may be subject to review in light of redeployment of resources and reprioritisation that is required in order to address the high amount of regulatory and other mandates. Tasks may be postponed, cancelled or undertaken with less intensive resource input.

[22] Own initiative project.

Activity 12 – Risk analysis

Contributing to priority	P2 Lead Directorate: Economic and Risk Analysis (ERA) Lead unit: RAST	
Objectives	1) Assess risks and vulnerabilities in the EU banking sector 2) Produce opinions and other work in the macroprudential area	
Description	The EBA will continue the work of monitoring market trends and the main developments in the EU banking sector. The objective is to identify, in a forward-looking fashion, vulnerabilities and potential risks that may affect EU banks, and to identify possible policy actions to address them. Finally, the EBA will support the implementation of the macroprudential framework in the EU.	
Main output	• Quarterly EU risk dashboards • Risk assessment questionnaires – two per year • Internal updates on liquidity and market developments for the BoS and the BSG • Work on macroprudential matters (including buffers) • Opinions on macroprudential measures (Article 458 CRR) and systemic risk buffers) • *Stock-take on the different macroprudential instruments applied across the EU +* • Thematic and topical notes on various risk • Contribution to ESRB work	Ongoing
	• JC spring risk report • RTS to specify the systemic importance indicators for third country branches - CP	Q1
	• Asset encumbrance report • Report on funding plans • JC autumn risk report	Q2
	• Risk assessment report (RAR) of the European banking system (annual)	Q3

+ Delivery of tasks marked with a + may be subject to review in light of redeployment of resources and reprioritisation that is required in order to address the high amount of mandates. Tasks may be postponed, cancelled or undertaken with less intensive resource input.

Activity 13 – Stress testing

Contributing to priority	P2 Lead Directorate: Economic and Risk Analysis (ERA) Lead unit: RAST
Objectives	1) Develop and implementation of the EU-wide stress test, including the work on top-down stress test - taking into consideration the recommendations of the ACP 2) Develop the environmental stress test
Description	To support the analysis of potential risks and vulnerabilities in the EU, the EBA initiates and coordinates EU-wide stress tests in cooperation with the ESRB. These allow assessment of the resilience of financial institutions to adverse market developments and feed into the microprudential and macroprudential assessments and decisions of the relevant CAs. This area of work also includes climate stress test in line with the EBA mandates. Based on the EU-wide stress test carried out by the EBA in 2023, the EBA will be applying changes to the methodology and also assessing further the centralisation of some risk areas by introducing top-down elements. This will be in addition to the introduction in the 2023

Activity 13 – Stress testing

	EU-wide stress test of top-down elements for Net Fee and Commission Income (NFCI). The EBA will also take into consideration the lessons learned from the 2023 EU-wide stress tests. The EBA will continue working on environmental stress test, including the one-off fit-for-55 climate scenario analysis included in the Commission's renewed sustainable finance strategy and regular climate stress tests according to the EBA Founding Regulation. For the stress test work, the EBA will consider the ACP recommendation to introduce supplementary proportionality considerations and more specifically the areas identified for enhancement or review: (i) increased application of top-down models, (iii) improvements of data flow and handling.	
Main output	• Ongoing work on the improvement of the stress test methodology • Incorporation of environmental risk into the stress test framework (regular environmental stress test) • Design and implementation of internal top-down stress test capacity	Ongoing
	• 2025 EU-wide stress test exercise (incl. hybrid work - launch, analysis and publication	Q2
	• Climate risk stress test preparation (including GL on institutions' stress test and supervisory stress test) • GL on institutions' climate stress test	TBC

Activity 14 – Regulatory impact assessments

Contributing to priority	ALL	Lead Directorate: Economic and Risk Analysis (ERA) Lead unit: EAIA
Objectives	1) Prepare analytical impact assessments and/or provide technical support for practically all mandates under priorities 1,2, 3,4, and 5– taking into consideration the recommendations of the ACP 2) To produce high quality research and technical analysis to improve the analytical quality of EBA outputs (reports and standards, infrastructure for risk analysis, top-down stress testing, supervision of ARTs and TPPs, as well as supervisory reporting). 3) To run the annual mandatory QIS data collection and Basel III monitoring exercises	
Description	Evidence-based and proportionate policymaking requires comprehensive impact assessments. In addition, the EBA Regulation requires that all EBA regulatory products are accompanied by explicit (analytical quantitative and/or qualitative) impact assessments. Economic analysis and impact assessments support the development of the EBA's regulatory products and are necessary inputs for the EBA's advice to the Commission, and a key contribution to the debate on regulatory reforms. Growth in activity in areas requiring new analytical/ modelling infrastructure – such as top-down stress testing, risk monitoring and analysis, ESG, MiCAR and DORA mandates as well as integrating supervisory benchmarking into regular data collections with the view of enhancing the quality of reported data – will continue to maintain a high level of analytical support and contributions. In this context the ACP recommended that proportionality considerations remain at the core of impact assessments that accompany the EBA's regulatory products and guidance. Contribution to the global monitoring of the implementation of Basel standards (the QIS exercise) requires annual data collection and analysis and frequent interaction with banks, NCAs and the BCBS community. As part of the economic analysis work the EBA carries out its research function, which includes organising workshops, seminars and running the staff paper series. It furthermore actively contributes to the methodology development across	

Activity 14 – Regulatory impact assessments

	the business areas, including stress testing models, risk analysis, ESG tools and models for resolution.	
Main output	• Impact assessment reports that accompany EBA's regulatory proposals and policy recommendations • Specific calls for advice requiring advanced economic and/or econometric analysis, thematic notes on risk analysis and other larger regulatory initiatives • Analysis and research to support and continuously enhance regular EBA economic and statistical methodology and analysis • Develop economic and statistical tools and models for new functions (such as stress testing, ESG and digital finance) • Maintenance and development of regular and ad hoc quantitative impact studies and the regular mandatory data collections for these, contacts to BCBS QIS TF and research TF • Publication of EBA staff papers • Contribution to work on ESG factors, financial innovation, payments, digital finance and AML/CFT • Contribution to the top down stress test framework • Contribution to the Task Force of Impact Studies and Advisory Committee on Proportionality • Organisation of and participation in academic seminars and research workshops or initiatives which benefit the quality of work in EBA products	Ongoing
	• CRR II / CRD V and CRR III / CRD VI / Basel III monitoring report (annual report)	Q3
	• Annual report on the impact and phase in of the LCR • Annual report on the impact and phase in of the NSFR • *Policy research workshop +*	Q4
	• *Call for advice (to be received) on insolvency benchmarking – as envisaged under the CMU action plan +*	TBD

+ Delivery of tasks marked with a + may be subject to review in light of redeployment of resources and reprioritisation that is required in order to address the high amount of mandates. Tasks may be postponed, cancelled, or undertaken with less intensive resource input.

Activity 15 – Data infrastructure and services, statistical tools

Contributing to priority	P3 P3	Lead Directorate: Data Analytics, Reporting and Transparency (DART) Lead unit: STAT
Objectives	1) Ensure timeliness, completeness and accuracy of date collected and facilitate its use and analysis in the context of EBA's policy, risk analysis, stress testing and transparency work. 2) Enhance Transparency in the banking sector through timely publication of Quarterly Risk Dashboards and other regular/ ad hoc outputs	

Activity 15 – Data infrastructure and services, statistical tools

Description	As a data-based and insight-driven institution, the EBA incorporates data and analytics as a key element in its strategic areas, with the objective of leveraging the enhanced technical capabilities for performing flexible and comprehensive analyses. In 2021 the EBA finalised its multi-annual data strategy which will, inter alia, root all EBA policy work in data and support members and the public in their data needs. In implementing its data strategy, and as part of its multi-annual priorities, the EBA aims to improve how regulatory data is compiled, extend the range of data collected, enhance the usability of its underlying systems, and strengthen its analytical capabilities. Main actions will entail designing processes for more standardisation and harmonisation of data acquisition; digitalisation/automatisation of the reporting framework development process; developing new tools for data processing and analytics; designing processes and developing analyses and products with wide range of internal and external stakeholders. As part of its data strategy, the EBA will capitalise on EUCLID, the European Centralised Infrastructure of Data, which became operational in 2020 and provides a reliable, secure and efficient platform to collect and process micro and aggregated data for all financial institutions. EUCLID includes data on smaller institutions and specialised business models, which will allow more proportionality in the EBA's work, resulting in more comprehensive analyses and better impact assessments. The EBA aims to reduce the burden for banks and competent authorities by maximising already reported supervisory data when supporting ad hoc data collections. The upgraded data infrastructure and broader data set will support the implementation of the EBA's data strategy, allowing to provide access, via a dissemination portal, to high-quality data and insights to internal and external stakeholders, by employing more advanced technical capabilities. It will provide analytical tools for risk analysis and develop and maintain its risk dashboards, interactive tools, and a list of EBA risk indicators. It will promote the use of reported data by providing tools and training for data users. This will involve ensuring the consistent application of reporting requirements through the application of validation rules and quality checks. The EBA will provide high-quality data at aggregate and bank-by-bank levels, on a need-to-know basis, to a wide range of stakeholders (investors, analysts, academics and the general public), and improve banks' own disclosures within and beyond Pillar 3.	
Main output	• Support regulatory work with quantitative analysis and analytical tools • *Provide data-based support for work on regulatory products (impact assessments) and technical advice requested by the Commission +* • *Provide data-based support for the statistical activities related to top-down stress test and climate risk stress test +* • *Provide data-based support for the statistical activities related to Supervisory benchmarking +* • Support and maintain the EBA's data infrastructure: master data and fact data for supervisory, resolution, IFs and payments purposes; setting reporting requirements; monitoring submissions • Manage the data workflow and interact with the CAs to ensure smooth data flow and quality • *Train CA and EBA users on data and analysis tools +* • Implement validation rules and quality checks for statistical analysis • Improve Transparency in the banking sector through the re-use of supervisory information and the pre-population of templates • Develop interactive and user-friendly visualisation tools for data dissemination	Ongoing

Activity 15 – Data infrastructure and services, statistical tools

	• Implementation of multi-year data strategy, building on EUCLID to improve data processing and analytical capabilities and to provide access, via a dissemination portal, to high-quality data and insights to stakeholders • Euclid upgrade for the collection and dissemination of Pillar 3 information • EUCLID upgrade for supporting DORA and MiCAR mandates	
	• Risk dashboards and other tools for internal and external data users • Update of macro- and bank-specific risk dashboards	Quarterly
	• 2025 EU-wide Transparency exercise • Supervisory disclosure exercise	Q4

+ Delivery of tasks marked with a + may be subject to review in light of redeployment of resources and reprioritisation that is required in order to address resources constraints. Tasks may be postponed, cancelled or undertaken with less intensive resource input.

3.3. Governance, coordination and support

Activity 16 – EBA governance, international affairs, communication

Contributing to priority	All — Lead Unit: Governance and External Affairs Lead unit: GEA
Objectives	1) Enable EBA governing bodies, management and the organisation to plan and run its activities and interaction with relevant stakeholders. 2) Handle the EBA's communication needs and training programme offered to CAs 3) Execute the EBAs' equivalence assessment programme.
Description	The activity supports the EBA’s governing bodies (BoS and MB), the Banking Stakeholder Group, the ESAs’ JC and Board of Appeal; and the EBA’s interactions with the EU and international institutions (e.g. GHOS/BCBS, IMF). It furthermore contributes to the planning of the EBA priorities, the establishment of the EBA’s work programme and the monitoring of its execution. The EBA will implement its communication strategy, deliver a new visual identity, and continue to revamp its website in order to support its mandates. To facilitate the competent authorities’ acquisition of the Single Rulebook, its understanding, and the convergence of supervisory practices, the activity furthermore extends its training offer in prudential and resolution areas and on emerging risks. With regards to equivalence, the EBA will assess the regulatory / supervisory and confidentiality frameworks of third countries and their equivalence with the EU framework, provide an opinion to the EC and monitor, together with the EC, the ongoing equivalence of countries covered by the EC’s equivalence decisions. The EBA will enter into cooperation agreements with the CAs of third countries, covering prudential, conduct and crisis-management cooperation, and monitor regulatory developments in – and in dialogue with – relevant jurisdictions (e.g. UK, US).

Activity 16 – EBA governance, international affairs, communication

Main output	• Support the EBA's governing bodies, as well as the Banking Stakeholder Group, the Advisory Committee on proportionality, the Board of Appeal and the ESAs Joint Committee work • Support the EBA's contribution to EU and international fora • Develop internal policies/processes to support the EBA's activities • Implement the EBA's communication strategy and ensure external and internal communication • Monitor the implementation of the ESAs' Review and possible follow-up to the Commission's report on the experience acquired following the revised ESAs' Regulation • Development and execution of the Union Strategic Supervisory Priorities 2024-2025 • Prepare and monitor the execution of the annual and multi-annual work programme • Develop and maintain relations with EU and non-EU stakeholders • Hold dialogues and exchanges with relevant authorities in in EU and non-EU jurisdictions • Training for EU competent authorities • Prepare reports and opinions on regulatory and confidentiality equivalence assessment and/or monitoring • Provide support for the implementation of the EU's Association Agreement with Andorra and San Marino	Ongoing
	• Single programming document (2026-2028 horizon)	Q1
	• Consolidated annual activity report 2024 • Annual report 2024 • JC Annual report	Q2
	• 2026 Annual work programme • JC 2026 Annual work programme	Q3
	• Report on the implementation standards on own funds requirements for market risk in third countries	Q4

Activity 17 – Legal and compliance

Contributing to priority	All	Lead Unit: Legal and Compliance Lead unit: L&C
Objectives	1) Ensure the EBA operates within a sound legal and ethical framework which supports staff and stakeholders in delivering EBA objectives and minimises scope for successful litigation and negative findings of inquiries 2) Strengthen consistency and effectiveness in supervisory outcomes and effective enforcement of Union law by carrying out three peer reviews and three follow-up peer reviews, monitoring potential breaches of Union law, contributing to settlement of disagreements between CAs, fostering and monitoring supervisory independence and supporting enforcement for MiCAR 3) Q&As are answered within 9 months by providing an effective workflow system and regular management reporting and escalation	
Description	Provision of legal analysis and support, and risk and compliance functions. This includes analysis and support on draft regulatory products, coordination of the Q&A process; carrying out peer reviews (see 2024/2025 work plan in Annex 15 – to be updated in Q2 2024),	

Activity 17 – Legal and compliance

	investigations into potential breaches of EU law and dispute resolution between CAs, monitoring and fostering of supervisory independence; representing the EBA before the Board of Appeal and the Court of Justice; providing data protection officer, ethics, anti-fraud and risk management functions; and ensuring that the EBA operates in accordance with its founding regulation and with all other applicable laws. The EBA will continue to operate and enhance its risk and compliance functions, develop CRD guidelines on supervisory independence, enhance the Q&A process and Interactive Single Rulebook; support sound implementation of MiCAR and DORA; and support transition of AML/CFT activities to AMLA.	
Main output	• Legal advice to EBA staff and governing bodies • Sound internal processes for adopting EBA decisions • Represent the EBA before the Board of Appeal and the Court of Justice and in interactions with the European Ombudsman • Development and implementation of data protection, ethics and whistleblowing, risk management and anti-fraud frameworks • Handle access to documents requests • Identify potential breaches of EU law, investigate and act as appropriate • Settle CA disputes through mediation and binding decisions • Monitor and foster supervisory independence of CAs • Q&A: coordinate the internal preparation by the policy areas of the answers to external stakeholders on the Single Rulebook	Ongoing
	• Peer review – Stress tests and resilience of national deposit guarantee schemes • Follow-up peer review – PSD2 authorisation	Q1
	• Peer review – Diversity and gender pay gap • Follow-up peer review – CVA risk	Q2
	• GL on the prevention of conflicts of interests in and independence of competent authorities • Peer review – 1/25 (topic to be specified) • Follow-up peer review – Treatment of mortgage borrowers in arrears	Q4

+ Delivery of tasks marked with a + may be subject to review in light of redeployment of resources and reprioritisation that is required in order to address resources constraints. Tasks may be postponed, cancelled or undertaken with less intensive resource input.

Activity 18 – Resources (HR and finance)

Contributing to priority	ALL	Lead Directorate: Operations Lead units: HR and FP
Objectives		1) Achieve at least 95 % execution of the 2024 annual budget and of carried forward appropriations 2) Achieve at least 95% of the Establishment Plan 3) Ensure adoption of the 2025 annual budget before 2024 year-end (subject to timely adoption of the EU general budget by the Budgetary authority) 4) Ensure input of the 2026 budget request to the Commission by 31 January 2024
Description		For HR, the focal point is to further modernise the HR strategy helping to deliver more diverse and inclusive organisational excellence by putting the right people, in the right place,

	at the right time with the right skills, with a focus on talent attraction, engagement and retention. More particularly, in a challenging fast-moving global context with new ways of working and staff changed expectations around work, the objective is to improve HR policies and processes for staff to optimally grow, thrive and deliver, being supported by HR digitalisation transformation. The finance activity will aim to further enhance budget acquisition, monitoring, and execution through electronic workflows for finance, procurement, and accounting processes, and through leveraging the implementation of the EBA collaboration platform. It will also continue the implementation of the systems and processes required to support fee-financing arising from the digital finance LFS, in coordination with ESMA and EIOPA. This will look, in particular, at activity-based budgeting/costing systems. The Finance team will also work on implementing SUMMA, which is the Commission's successor to the current ABAC budget and accounting system. The EBA will benefit from the Public Procurement Management Tool (PPMT), developed by the Joint Research Centre with the Commission's Directorate-General for Informatics and for Budget, which the EBA implemented in 2022 but continues to improve and expand, and which now enables all procurement procedures to be run through the tool.	
Main output	*HR* • Maximise execution of the Establishment Plan (at least 95%) • Ensure compliance to the SR/CEOS with Implementing Rules' adoption (Article 110 of the SR) • Optimise talent attraction and acquisition approach • Revamp talent career development framework with competency's library • Increase HR digitalisation (e-recruitment tool and new SYSPER/Service now) *Finance* • Execution of the 2025 annual budget • Acquisition of the 2026 budget • Establishment of the 2027 budget • Implementation of the 2025 procurement plan • Production of the 2024 annual accounts • Implementation of system(s) for budgeting and costing fees (MiCAR/DORA) • Implementation of the Commission's SUMMA system (successor to the current ABAC accounting and budget system) • Support the annual ECA audit • Ongoing improvement projects (Finance & Procurement)	Ongoing

Activity 19 – Infrastructures (Information technology and Corporate Support)

Contributing to priority	ALL	Lead Directorate: Operations Lead units: IT and CS
Objectives	1) Prepare and execute annual and multi-annual IT Strategies 2) Fit out premises to accommodate new tasks (DORA, MiCAR) and hybrid work 3) Improve environmental performance and reduce reduce carbon footprint	
Description	The EBA has adopted an IT strategy to become a Digital Agency by 2025, embarking on a bold and ambitious digital transformation journey for the entire organisation. The activity includes the transformation, delivery and adoption of IT solutions that are fit for purpose, easy to use,	

Activity 19 – Infrastructures (Information technology and Corporate Support)

<table>
<tr><td></td><td>secure and effective, in line with the adopted Cloud Strategy. Furthermore, it will provide services and technology leadership to enable the EBA to achieve its mission and to support its everyday operations as a trusted business partner.

Digital services and solutions include operating and continuously enhancing an EU Data Hub of information based on the EUCLID Platform (further enhance master and data collection and implement dissemination capabilities); enhancing tools for developing and maintaining the reporting framework; enabling efficient collaboration with and support core business processes. From a sustainable infrastructure and security perspective, the aim is to operate in a cloud infrastructure, with an enhanced risk management and response framework.

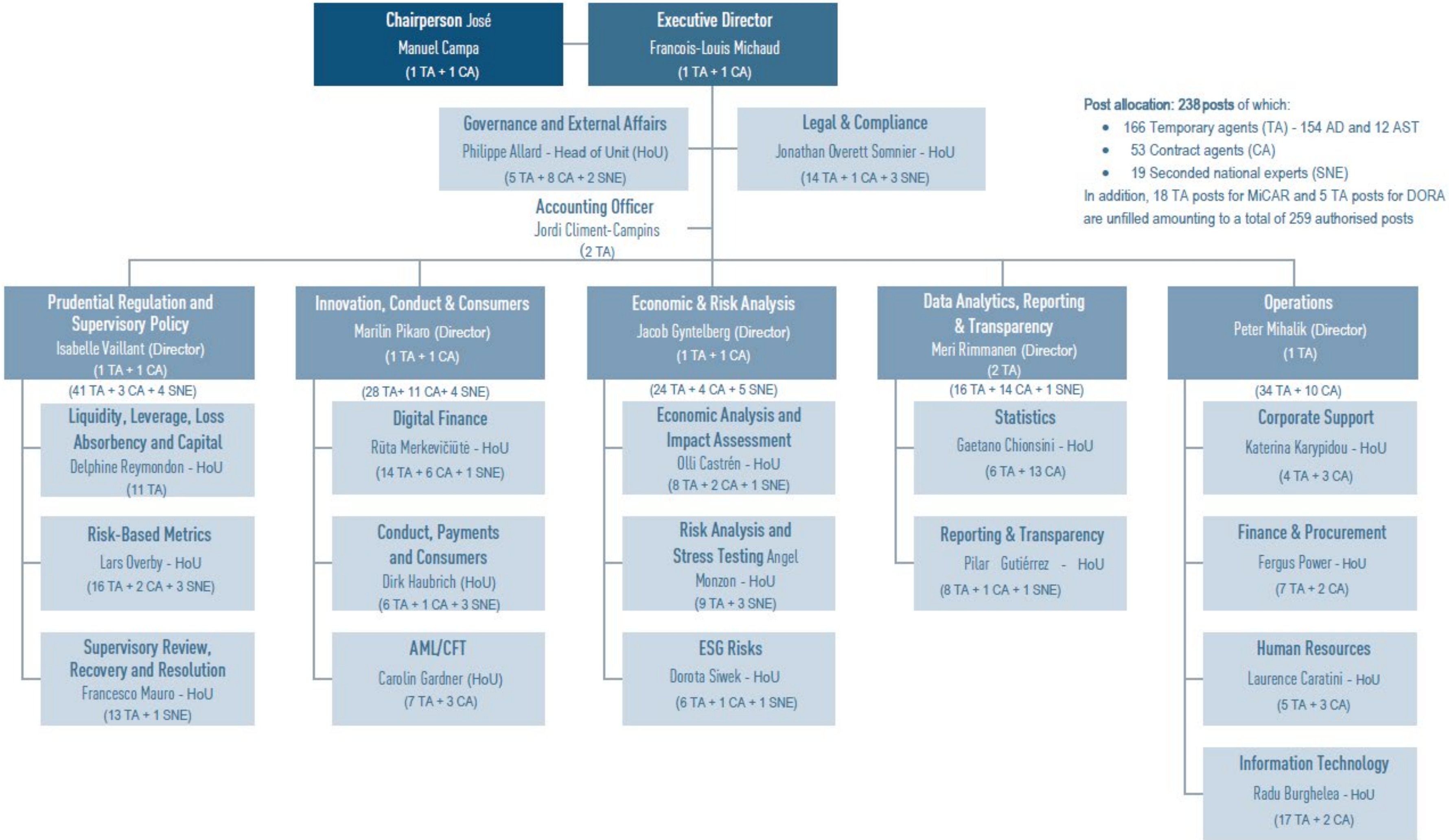
Corporate Support ensures that the EBA staff can rely on all necessary means (premises, equipment) to develop their activities. It also supports internal controls of the EBA's activities, and reports to management on the achievement of the EBA's objectives. It supports the EBA's core functions based on specialised knowledge and best practices to serve internal stakeholders and business partners.</td><td></td></tr>
<tr><td>Main output</td><td>IT
Implement the EBA's IT strategy for 2020-2025
Migrate the existing infrastructure to cloud, transform current IT Estate and join the Cloud II Framework of the EC
Master and reporting data collection via the EUCLID platform (including committed information rate, peak information rate, supervisory, resolution, investment firms (IFs), Covid-19 reporting, Pillar III disclosures)
Enhance EUCLID solution with data validation and dissemination capabilities. Implementation of a data dissemination solution in light of preparing for the Pillar II data hub.
Implement tools for the support of the EBA reporting framework
Support and enhancement of AML solution (EuReCA platform).
Support and enhance collaboration tools within EBA and external stakeholders
Replace legacy systems with cloud native solutions
Support and tools for the Single Rulebook/signposting/ Q&A
Access management and security enhancements
Implementation of solutions for the EBA's operational readiness to take up new tasks in relation to MiCAR and DORA
Support the organisation of internal and external meetings
Corporate support
Support the provision of catering and canteen services
Support the organisation of internal and external meetings (including reimbursements)
Support the organisation and reimbursement of missions
Manage the EBA premises, reception, postal services and office supplies
Projects related to premises (fit-out; design; furniture)
Adhere to security, health and safety requirements and supplies
Ensure that the use/disposal of EBA assets and inventory is compliant, safe, economic and environmentally friendly
Maintain EMAS registration and continue to improve the EBA's environmental performance and reduce its carbon footprint
Coordinate the implementation of Sustainability Reporting standards</td><td>Ongoing</td></tr>
</table>

Activity 19 – Infrastructures (Information technology and Corporate Support)

	• Contribute to the improvement and monitoring of an internal control system • Audits: European Court of Auditors (ECA) and EC Internal Audit Services (IAS) • Contribute to the EBA-wide annual risk assessment exercise and undertake corporate support related specific risk	
	Corporate support • Manage the business continuity strategy and coordinate the annual business continuity exercise	Q1

eba European Banking Authority

ANNEX I: ORGANISATION CHART (AS OF 31/12/2023)



ANNEX II: RESOURCE ALLOCATION PER ACTIVITY – 2025- 2027

The table below summarises the resource allocation per activity and details the type of resource: TA, CA or SNE. Management staff and their assistants are distributed over the activities within their respective remits, hence the staffing numbers per activity are not whole numbers. (Minor differences in totals are due to rounding.)

		2024					2025					**2026**					**2027**				
	Activity	**TA**	**CA**	**SNE**	**Total**	**Cost (EUR)**	**TA**	**CA**	SNE	Total	**Cost (EUR)**	**TA**	**CA**	SNE	Total	**Cost (EUR)**	**TA**	**CA**	SNE	Total	**Cost (EUR)**
	Policy and convergence work	**76.6**	**15.8**	**9.0**	**101.4**	**22,896,558**	**72.0**	**11.8**	9.0	92.8	**21,104,740**	**70.2**	**10.8**	**9.0**	**90.0**	**21,209,742**	**70.2**	**10.8**	**9.0**	**90.0**	**21,621,543**
P1	1 - Capital, loss absorbency, and accounting	7.5	0.2	0.0	**7.8**	1,834,463	7.8	0.2	-	8.0	1,914,687	7.8	0.2	-	**8.0**	1,924,213	7.8	0.2	-	**8.0**	1,961,573
P1	2 - Liquidity, leverage, and interest rate risk	3.1	0.1	-	**3.2**	793,927	3.4	0.1	-	3.5	889,905	3.4	0.1	-	**3.5**	894,333	3.4	0.1	-	**3.5**	911,697
P1	3 - Credit risk (incl. large exposures, loan origination, NPL, securitisation)	8.4	1.9	2.0	**12.3**	2,439,032	8.4	1.9	2.0	12.3	2,509,973	8.4	1.9	2.0	**12.3**	2,522,461	8.4	1.9	2.0	**12.3**	2,571,436
P1	4 - Market, investment firms and services, and operational risk	8.6	0.6	1.0	**10.2**	2,195,012	8.6	0.6	1.0	10.2	2,268,171	8.6	0.6	1.0	**10.2**	2,279,456	8.6	0.6	1.0	**10.2**	2,323,713
P1	5 - Market access, governance, supervisory review and convergence	7.9	0.2	0.8	**8.9**	2,000,605	9.5	0.2	1.0	10.7	2,443,481	9.5	0.2	1.0	**10.7**	2,455,638	9.5	0.2	1.0	**10.7**	2,503,315
P1	6 - Recovery and resolution	3.6	0.1	-	**3.7**	953,396	3.7	0.1	-	**3.8**	960,276	3.7	0.1	-	**3.8**	965,054	3.7	0.1	-	**3.8**	983,791
P1,2	7 - ESG in supervision and regulation	6.4	1.2	1.0	**8.6**	1,798,965	6.4	1.2	1.0	**8.6**	1,843,623	6.4	1.2	1.0	**8.6**	1,852,795	6.4	1.2	1.0	**8.6**	1,888,769
P4,5	8 - Innovation and FinTech*	19.4	6.7	1.3	**27.3**	6,758,973	14.8	5.9	1.0	**21.7**	4,834,221	12.6	4.9	1.0	**18.4**	4,858,272	12.6	4.9	1.0	**18.4**	4,952,599
P5	9 - Payment services, consumer and depositor protection.	4.7	1.4	3.0	**9.0**	1,652,867	5.9	0.6	3.0	**9.4**	1,837,008	6.4	0.6	3.0	**9.9**	1,846,147	6.4	0.6	3.0	**9.9**	1,881,991
P5	10 - Anti-money laundering and countering the financing of terrorism	6.9	3.4	-	**10.4**	2,469,318	3.4	1.0	-	**4.4**	1,603,395	3.4	1.0	-	**4.4**	1,611,373	3.4	1.0	-	**4.4**	1,642,658
	Risk assessment and data	**33.7**	**17.5**	**5.0**	**56.1**	**15,738,103**	**34.1**	**17.5**	**5.0**	**56.6**	**15,392,106**	**34.1**	**17.5**	**5.0**	**56.5**	**15,468,686**	**34.1**	**17.5**	**5.0**	**56.5**	**15,769,021**
P1,3	11 - Reporting and transparency framework	8.9	1.0	1.0	**10.9**	2,575,991	8.9	1.0	1.0	**10.9**	2,851,546	8.9	1.0	1.0	**10.8**	2,865,733	8.9	1.0	1.0	**10.8**	2,921,373
P2	12 - Risk analysis	5.0	0.2	-	**5.2**	1,362,289	5.0	0.2	-	**5.2**	1,258,572	5.0	0.2	-	**5.2**	1,264,833	5.0	0.2	-	**5.2**	1,289,391
P2	13 - Stress testing	4.5	0.2	3.0	**7.7**	1,424,812	4.6	0.2	3.0	**7.8**	1,480,297	4.6	0.2	3.0	**7.8**	1,487,662	4.6	0.2	3.0	**7.8**	1,516,546
All	14 - Regulatory impact assessments	8.1	2.5	1.0	**11.5**	2,364,901	8.4	2.5	1.0	**11.9**	2,758,116	8.4	2.5	1.0	**11.9**	2,771,838	8.4	2.5	1.0	**11.9**	2,825,655
P3,4	15 - Data infrastructure and services, statistical tools	7.3	13.5	-	**20.8**	8,010,109	7.3	13.5	-	**20.8**	7,043,576	7.3	13.5	-	**20.8**	7,078,620	7.3	13.5	-	**20.8**	7,216,056

		2024					2025					2026					2027				
	Activity	**TA**	**CA**	**SNE**	**Total**	**Cost (EUR)**	**TA**	**CA**	SNE	Total	**Cost (EUR)**	**TA**	**CA**	SNE	Total	**Cost (EUR)**	**TA**	**CA**	SNE	Total	**Cost (EUR)**
	Coordination and support	**55.7**	**19.7**	**5.0**	**80.4**	**17,998,413**	**55.7**	**19.7**	**5.0**	**80.5**	**18,394,242**	**55.7**	**19.7**	**5.0**	**80.5**	**18,485,759**	**55.7**	**19.7**	**5.0**	**80.5**	**18,844,672**
ALL	16 - EBA governance, international affairs, communication	5.1	8.3	2.0	**15.4**	2,763,784	5.1	8.3	2.0	**15.4**	3,027,725	5.1	8.3	2.0	**15.4**	3,042,789	5.1	8.3	2.0	**15.4**	3,101,866
ALL	17 - Legal and compliance	14.2	1.0	3.0	**18.2**	3,817,770	14.2	1.0	3.0	**18.2**	3,904,219	14.2	1.0	3.0	**18.2**	3,923,644	14.2	1.0	3.0	**18.2**	3,999,824
ALL	18 - Resources (HR and finance)	14.6	5.2	-	**19.8**	4,440,313	14.6	5.2	-	**19.8**	4,453,634	14.6	5.2	-	**19.8**	4,475,792	14.6	5.2	-	**19.8**	4,562,693
ALL	19 - Infrastructures (Information technology and corporate support)	21.9	5.2	-	**27.1**	6,976,546	21.9	5.2	-	**27.2**	7,008,664	21.9	5.2	-	**27.2**	7,043,534	21.9	5.2	-	**27.2**	7,180,289
	Sub-total	**166.0**	**53.0**	**19.0**	**238.0**	**56,633,074**	**161.8**	**49.0**	**19.0**	**229.9**	**54,891,088**	**160.0**	**48.0**	**19.0**	**227.0**	**55,164,187**	**160.0**	**48.0**	**19.0**	**227.0**	**56,235,235**
P4	**DORA oversight / MiCAR supervision**	**23.0**	**-**	**-**	**23.0**	-	**27.3**	**2.0**	**-**	**29.3**		**28.0**	**2.0**	**-**	**30.0**		**28.0**	**2.0**	**-**	**30.0**	
	8A - MiCAR fee funded posts (unfilled)	18.0	-	-	18.0	-	20.0	-	-	20.0	2,629,000	20.0	-	-	20.0	5,722,000	20.0	-	-	20.0	5,809,000
	8A - DORA fee-funded posts (unfilled)	5.0	-	-	5.0	-	7.3	2.0	-	9.3	693,333	8.0	2.0	-	10.0	2,553,333	8.0	2.0	-	10.0	2,683,000
	Total	**189.0**	**53.0**	**19.0**	**261.0**	**56,633,074**	**189.0**	**51.0**	**19.0**	**259.0**	**58,213,973**	**188.0**	**50.0**	**19.0**	**257.0**	**63,439,520**	**188.0**	**50.0**	**19.0**	**257.0**	**64,727,235**

* Includes MiCAR and DORA preparations (mostly through internal resource redeployments), posts foreseen for the EU Supervisory Digital Finance Academy (including one CA post funded by DG REFORM), as well as 5 EU-funded posts foreseen in the Union budget. Fee-funded posts will in principle be filled when fees are raised, which given the delayed adoption of the legislations is expected to start in 2025.

A shared accounting services arrangement with ESMA was introduced in 2021 to exploit synergies of both authorities being now based in Paris. According to this arrangement, updated in 2023, the EBA is providing 50% of the time of its accounting officer to ESMA.

ANNEX III: FINANCIAL RESOURCES 2025-2027

Table 1 – Revenues (COM report format)

REVENUES	2023 executed budget	2024 budget	2025 requested budget	Envisaged 2026	Envisaged 2027
1 REVENUE FROM FEES AND CHARGES	**-**	**-**	**3,322,333**	**8,275,333**	**8,492,000**
2. EU CONTRIBUTION	**19,428,306**	**20,774,871**	**20,071,829**	**20,284,866**	**20,689,764**
of which assigned revenues deriving from previous years' surpluses	*391,315*	*134,440*	-	-	-
3 THIRD COUNTRIES CONTRIBUTION (incl. EFTA)	**974,592**	**1,048,861**	**1,018,465**	**1,030,160**	**1,050,915**
of which EFTA	*974,592*	*1,048,861*	*1,018,465*	*1,030,160*	*1,050,915*
4 OTHER CONTRIBUTIONS	**32,269,103**	**34,809,342**	**33,801,346**	**33,849,161**	**34,494,556**
of which EU NCA contributions	*31,479,331*	*33,878,222*	*32,896,407*	*33,274,161*	*33,944,556*
of which DG REFORM contributions	*575,000*	*575,000*	*575,000*	*575,000*	*550,000*
of which host state contributions	*214,772*	*356,119*	*329,939*	-	-
5 ADMINISTRATIVE OPERATIONS					
6 REVENUES FROM SERVICES RENDERED	**392,994**	**-**	**-**	**-**	**-**
7 CORRECTION OF BUDGETARY IMBALANCES					
TOTAL REVENUES	**53,064,996**	**56,633,074**	**58,213,973**	**63,439,520**	**64,727,235**

Calculating NCA contributions

These are the inputs for the calculation:

	Inputs	2025 value	Source
A	Amount of the EU subsidy	20,071,829	Set by the budgetary authority
B	Ratio of the EU subsidy to Member State contributions	40:60	EBA founding regulation – recital
C	Budgeted amount of the employer's pension contribution (NCA-funded only)	2,875,000	Calculated by EBA
D	Total NCA voting weight	333	Article 3(3) of Protocol (No 36) on transitional provisions
E	Total EU NCA voting weight	323	Article 3(3) of Protocol (No 36) on transitional provisions
F	Total EFTA NCA voting weight	10	Article 62(1)(a) of Annex IX (Financial services) to the EEA agreement [23]

The calculation formulae are:

$$EU\ NCA\ contribution = \left(EU\ subsidy * \frac{60}{40}\right) + \left(Pension\ funded\ by\ NCA * \frac{EU\ NCA\ voting\ weight}{Total\ NCA\ voting\ weight}\right)$$

$$EFTA\ NCA\ contribution = EU\ NCA\ contribution * \frac{EFTA\ NCA\ voting\ weight}{EU\ NCA\ voting\ weight}$$

[23] https://www.efta.int/media/documents/legal-texts/eea/the-eea-agreement/Annexes%20to%20the%20Agreement/annex9.pdf.

Table 2 – Expenditure

All figures below are in euros.
The EBA operates a system of non-differentiated appropriations, so commitment appropriations and payment appropriations are equal.

Expenditure	2024		2025	
	Commitment appropriations	Payment appropriations	Commitment appropriations	Payment appropriations
Title 1 - Staff expenditure	36,859,936	36,859,936	37,333,403	37,333,403
Title 2 - Infrastructure and operating expenditure	10,788,623	10,788,623	10,435,707	10,435,707
Title 3 - Operational expenditure	8,984,516	8,984,516	7,122,530	7,122,530
TOTAL EXPENDITURE (before MiCAR/DORA)	**56,633,074**	**56,633,074**	**54,891,640**	**54,891,640**

EXPENDITURE	Budget 2023 (actual spend[24])	Budget 2024	Draft budget 2025			Envisaged 2026	Envisaged 2027
			Budget request 2025	Budget forecast	VAR 2025 /2024		
Title 1 Staff expenditure	**34,082,857**	**36,859,936**	**37,333,403**			**37,534,204**	**38,265,661**
11 Salaries & allowances	29,739,222	31,924,700	32,387,715			32,520,055	33,146,462
- of which establishment plan posts	24,282,622	25,641,545	26,430,841			26,538,841	27,050,037
- of which external personnel	5,456,600	6,283,155	5,956,874			5,981,214	6,096,425
12 Expenditure relating to staff recruitment	2,409,221	2,800,000	2,875,000			2,935,000	3,000,000
11.33 Employer's pension contributions	238,335	279,290	230,010			230,950	235,398
13 Mission expenses	84,951	87,241	81,509			81,842	83,418
14 Socio-medical infrastructure	749,206	844,111	831,984			835,384	851,475
15 Training	426,345	474,528	492,120			494,131	503,649
16 External Services	291,451	341,866	307,003			308,257	314,195
17 Receptions and events	144,126	108,200	128,063			128,586	131,063
Title 2 Infrastructure and operating expenditure	**11,775,877**	**10,788,623**	**10,435,707**			**10,478,348**	**10,680,184**
20 Rental of buildings and associated costs	4,235,112	4,775,177	4,104,776			4,121,549	4,200,939
21 Information and communication technology	6,504,839	5,007,371	5,398,831			5,420,892	5,525,310
23 Current administrative expenditure	609,170	594,371	541,976			544,190	554,673
24 Postage / telecommunications	42,688	-	-			-	-
27 Information and publishing	384,068	411,704	390,124			391,718	399,263
Title 3 Operational expenditure	**5,808,178**	**8,984,516**	**7,122,530**			**7,151,634**	**7,289,390**
31 General operational expenditure	1,875,008	2,491,887	2,396,749			2,406,542	2,452,898
32 IT expenditure for operational purposes	3,933,170	6,492,629	4,725,781			4,745,091	4,836,492
TOTAL EXPENDITURE before MiCAR/DORA fees	**51,666,913**	**56,633,074**	**54,891,640**			**55,164,187**	**56,235,235**
MiCAR and DORA expenditure (fee-funded)	**-**	**-**	**3,322,333**			8,275,333	8,492,000
TOTAL EXPENDITURE	**51,666,913**	**56,633,074**	**58,213,973**			**63,439,520**	**64,727,235**

[24] Budget 2023 shows actual expenditure on voted budget.

Table 3 – Budget outturn and cancellation of appropriations

Budget outturn	2021	2022	2023 (draft)
Reserve from the previous year's surplus (+)	339 610	467 881	605 145
Revenues actually received (+)	49 681 484	50 628 924	52 467 897
Payments made (-)	-41 873 122	-43 982 571	- 48 857 367
Carry-over of appropriations (-)	-7 298 331	-7 059 468	- 3 945 729
Cancellation of appropriations carried over (+)	86 867	124 390	71 989
Adjustment for carry-over of assigned revenue appropriations from previous year (+)	63 153	166 169	737 110
Exchange rate differences (+/-)	- 3 200	-2 982	500
Adjustment for negative balance from previous year (-)			-
Total surplus	**996 461**	**342 343**	**1 079 545**

The 2023 budget outturn is a draft figure that may still require adjustment during the accounts closure. It resulted from two factors. Firstly, the average number of TA and CA hitting the budget were lower than budgeted, by 5 % and 10 % respectively. Secondly, a number of guidelines were not available to be sent for translation in 2023, resulting in translation costs coming in significantly lower than initially budgeted.

The 2023 surplus will be offset against 2025 contributions.

One hundred and eight (108) commitments were carried over from 2022. The EBA decommitted 1.1 % of the value of commitments carried over i.e., EUR 71,989 from a total of EUR 6,322,359. This represents an improvement on the percentage execution on carry forward compared to the previous year, when 1 commitments were carried forward with a value of EUR 7,132,162 of which 1.7 % was decommitted by value.

ANNEX IV: HUMAN RESOURCES - QUANTITATIVE

Table 1 – 2025-2027 overview of staff by contract type

a. Overview of total EBA staff (with SDFA - MiCAR – DORA - AMLA)

Staff	2023 Year N-1			2024 Year N	2025 Year N+1	2026 Year N+2	2027 Year N+3
ESTABLISHMENT PLAN POSTS	**Authorised Budget**	**Actually filled as of 31/12/2023**	**Occupancy rate% (f)**	**Authorised staff**	**Envisaged staff**	**Envisaged staff**	**Envisaged staff**
Administrators (AD)	151	149	99%	151	151	151	151
Assistants (AST)	11	11	100%	11	11	11	11
Assistants/Secretaries (AST/SC)				-	-	-	-
SDFA (a)	1	1	**100%**	**1**	**1**	**-**	**-**
MiCAR (b)	15			**20**	**22**	**22**	**22**
DORA (c)	6			**6**	**8**	**8**	**8**
AMLA (d)				-	**-4**	**-4**	**-4**
TOTAL ESTABLISHMENT PLAN POSTS	**184**	**161**	**88% (99%)**	**189**	**189**	**188**	**188**
EXTERNAL STAFF	**FTE corres-ponding to authorised Budget**	**Executed FTE as of 31/12/2023**	**Execution rate % (f)**	**Headcount as of 31/12/2023**	**FTE corres-ponding to authorised budget**	**Envisaged FTE**	**Envisaged FTE**
Contract Agents (CAs)	50	49	98%	50	50	50	50
SDFA (a)							
MiCAR (b)				2	2	2	2
DORA (c)				-	2	2	2
AMLA (d)				-	-4	-4	-4
Seconded National9Experts (SNEs)(e)	19	14	74%	19	19	19	19
TOTAL EXTERNAL STAFF	**69**	**63**	**90%**	**71**	**69**	**69**	**69**
TOTAL STAFF	**253**	**224**	**88% (96%)**	**260**	**258**	**257**	**257**

a) Includes 1 TA/AD6 for SDFA, funded by DG REFORM for 3 years (from 2023 until end of 2025). The CA post for SDFA, funded by DG REFORM, is shown in Table 1.b below.

b) For MiCAR the LFS allocates:
- in 2023: 15 TA/AD fee-funded posts,
- in 2024: 3 additional TA/AD fee-funded posts, but also 2 TA/AD EU/NCA-funded posts representing a total of 20 TA/AD posts (18 fee-funded and 2 EU/NCA funded); as well as 2 CA/FG IV EU/NCA funded posts planned for indirect supervision tasks for MiCAR;
- in 2025: 2 more TA/AD fee-funded posts.

In total the EBA is allocated 22 TA/AD posts (20 fee-funded and 2 EU/NCA funded) and 2 CA posts (EU/NCA funded).

c) For DORA the LFS allocates in total 30 posts to the three ESAs. The planning assumes at this stage that the posts allocated to the ESAs are shared equally among the EBA, EIOPA and ESMA. Under this assumption of equal allocation, the EBA would obtain between 2023-2025 a total of 10 posts: 6 TA ADs, 2 TA /AST and 2 CA/FGIV.

All of the posts are ultimately fee-funded. The 6 TA ADs are allocated as of 2023. The 2 TA AST4 are allocated as of 2024, although one post is funded by the EU/NCA until 09/2025. The CA/FG IV are allocated as of 2025.

d) From 2025, 4 TA/AD and 4 CA/FG IV posts are given to the new AMLA.

e) The EBA has 19 cost-paid SNE positions and relies on 13 cost-free SNEs.

f) Percentages in brackets are showing the real occupancy rate without the MiCAR/DORA posts that cannot be filled without the fees.

b. Additional external staff expected to be financed from grant, contribution or service-level agreements

Human Resources	Year N	Year N+1	Year N+2	Year N+3
	Envisaged FTE	Envisaged FTE	Envisaged FTE	Envisaged FTE
Contract Agents (CAs)	1-	1-	1-	1-
Seconded National Experts (SNEs)	-	-	-	-
TOTAL	-	-	-	-

*As indicated above , the posts included here represents the CA for the SDFA funded by DG REFORM.

c. Other Human Resources

Structural service providers	FTE in place as of 31/12/2023
Security	-
IT	33
Other (specify) **Corporate Support**	5

Interim workers	Total FTEs in year 2023 N-1
Number	2

Table 2 – 2025-2027 -overview of staff by grade

Overview of Temporary agents (with SDFA - MiCAR - DORA - AMLA)

Function group and grade	2023 Year N-1				2024 Year N		2025 YearN+1		2026 Year N+2		2027 Year N+3	
	Authorised budget		Actually filled as of 31/12/2023		Authorised budget		Envisaged		Envisaged		Envisaged	
	Permanent posts	Temporary posts	Permanent posts	Temporary posts	Permanent posts	Temporary posts	Permanent posts	Temporary posts	Permanent posts	Temporary posts	Permanent posts	Temporary posts
AD 16		1		0		1		1		1		1
AD 15		1		1		1		1		1		1
AD 14		5		3		5		5		5		5
AD 13		2		0		2		2		2		2
AD 12		8		9		8		12		12		12
AD 11		12		6		12		10		12		12
AD 10		13		17		13		19		20		20
AD 9		24		23		25		25		25		25
AD 8		27		26		28		30		31		31
AD 7		30		30		32		35		31		31
AD 6		19*		18		21		20		19		19
AD 5		30		17		29		16		16		16
AD TOTAL	-	**172**		**150**	-	**177**	-	**176**	-	**175**	-	**175**
AST 11												
AST 10												
AST 9												
AST 8												
AST 7								1		1		1
AST 6		3		1		3		2		3		4
AST 5		4		2		4		2		3		5
AST 4		2		2		3		5		5		3
AST 3		1		3		1		2		1		
AST 2		2		3		1		1				
AST 1		0		0								
AST TOTAL	-	**12**		**11**	-	**12**	-	**13**	-	**13**	-	**13**
AST/SC*TOTAL	-	-		-	-	-	-	-	-	-	-	-
TOTAL	-	**184**		**161**	-	**189**	-	**189**	-	**188**	-	**188**

* The EBA will take the opportunity to convert one TA/AST into AST/SC when becoming free.

Overview of Contract agents (with SDFA – MiCAR – DORA – AMLA)

Contract agents	FTE corres-ponding to authorised budget 2023 N-1	Executed FTE as of 31/12/2023 N-1	Headcount as of 31/12/2023 N-1	FTE corres-ponding to authorised budget 2024 N	FTE corres-ponding to authorised budget 2025 N+1	FTE corres-ponding to authorised budget 2026 N+2	FTE corres-ponding to authorised budget 2027N+3
Function group IV	42*	42	42	44**	42***	42	42
Function group III	8	7	7	8	8	8	8
Function group II	-	-	-	-	-	-	-
Function group I	-	-	-	-	-	-	-
TOTAL	**50***	**49**	**49**	**52****	**50*****	**50**	**50**

* Figures for 2023 through to 2025 do not include 1 CA/FG IV post for SDFA funded by DG REFORM until 2025 shown in table 1.b.
** Figure includes 2 CA/FG IV posts for MiCAR (EU/CA funded).
***Figure includes 2 CA/FG IV posts for DORA (fee funded) and excludes 4 CA/FG IV posts for AMLA.

Overview Seconded National Experts (SNEs)

Seconded National Experts	FTE corres-ponding to authorised budget 2023 (N-1)	Executed FTE as of 31/12/2023 (N-1)	Headcount as of 31/12/2023 (N-1)	FTE corres-ponding to authorised budget 2024 (N)	FTE corres-ponding to authorised budget 2025 (N+1)	FTE corres-ponding to authorised budget 2026 (N+2)	FTE corres-ponding to authorised budget 2027 (N+3)
TOTAL	19	14	14	19	19	19	19

* The EBA has 19 cost-paid SNE positions and relies on 13 cost-free SNEs.

Table 3 – 2024 recruitment forecasts following retirement/mobility or new requested posts

Job title in the Agency	Type of contract (Official, TA or CA)	TA/Official: Function group/grade of internal (brackets) and external (single grade) recruitment foreseen for publication		CA: Recruitment Function Group (I, II, III and IV)
	Due to foreseen retirement/ mobility	Internal (brackets)	External (brackets)	
Head of Unit	TA	AD9 – AD12	AD9 - AD10	n/a
AD8 – title TBC	TA	AD7 – AD12	AD8	n/a
AD7 – title TBC	TA	AD5-AD7	AD7	n/a
AD6 – title TBC	TA	AD5-AD7	AD6	n/a
AD5 – title TBC	TA	AD5-AD7	AD5	n/a
AST2 – title TBC	TA	AST2 – AST6	AST2	n/a
FGIV – title TBC	CA			IV

Note: Recruitments to fill current vacancies and usual turn-over are planned till end of 2023. However, specific recruitments from 2024-2025 DORA/MiCAR posts allocation will be planed/carried out once the resources repartition are further clarified. These recruitments will be carried out accordingly to the entry grade as defined by the Staff Regulations.

ANNEX V: HUMAN RESOURCES QUALITATIVE

A. Recruitment policy

In compliance with Article 110 of the Staff Regulations, the EBA has adopted the following Implementing Rules:

Working time and hybrid working	Commission Decision C(2022)1788
Engagement of CAs	Model Decision C(2019)3016
Engagement of TAs	Model Decision C(2015)1509
Middle Management	Model Decision C(2018)2542
Type of posts	Model Decision C(2018)8800

The EBA is an equal opportunities employer. It selects staff without prejudice as to race, political, philosophical or religious beliefs, gender or sexual orientation, and without reference to their marital status or family situation. The EBA has adopted the EUAN Charter on Diversity and Inclusion.

Talent selection at the EBA endeavour to employ personnel of the highest standards of ability, efficiency, and integrity, from the broadest possible geographical basis among nationals of the EU Member States and the countries in the European Economic Area.

The selection procedures comply with the relevant EU provisions, namely the Staff Regulations (SR/Annex III), the Conditions of Employment of Other Servants of the European Union (CEOS/Article 12) and the Implementing Rules (IRs/use of Temporary Agent and Contract Agent adopted by the EBA with the agreement of the European Commission pursuant to Article 110 of the SR). The number of positions published, and the grades reflect an internal staff planning assessment in accordance with the EBA Establishment Plan capacity and budget based on the objectives and activities to be delivered. The EBA is further developing initiatives to reinforce its place as an employer of choice with a strong Employee Value Proposition through the implementation of an integrated Talent Management, the digitalisation of HR processes with an e-recruitment tool, the development of competencies framework, etc.

The EBA employs Temporary Agents and Contracts Agents as statutory staff. The EBA also offer non-statutory positions as Seconded National Experts (SNEs) and Trainees.

Temporary Agents: the majority of staff in the Agency are Temporary Agents 2(f), except the Management Board Chair and the Executive Director who are Temporary Agents 2(a). Usually, Temporary Agents are recruited for permanent tasks to cover core operational and managerial functions at entry grade level (as per the SR) accordingly to the job profile and expertise. Recruitments are generally done at grades ranging from AST1 to AST4 for Assistants and from AD5 to AD8 for Administrators. Recruitment at higher grade is limited to filling managerial positions, such as TA/AD9 for Middle Manager (HoU) and TA/AD12 for Senior Manager (Head of Departments).

Contract Agents: usually Contract Agents are recruited for permanent tasks to cover junior and support functions, to provide secretarial and technical assistance with operational activities. Recruitments are generally done at grade FG IV for technical level of expertise and for Personal Assistant to the senior Management and at grade FG III for Administrative level of expertise.

Seconded national experts[25]**:** the objective is to foster the exchange of experience and knowledge and to widen the expertise network, given the specific expertise needed by the EBA that is difficult to find on the

[25] SNEs are not employed by the agency.

market. SNEs can be seconded for a period between 6 months and 24 months. The rules applicable to seconded national experts can be found on the EBA's website[26].

Trainees: the objective is to offer paid traineeships to talented young professionals early in their careers, in a field of their choice. The selection procedure is open and transparent, done through the publication of a call on the EBA website. Traineeship can last to a maximum of 18 months.

Interns: the objective is to offer job shadowing internship opportunities to students aged 14 to 19 years old to enrich their general civic culture by helping them discover the professional world of an EU Agency and figure out preferences for their professional orientation. Internship usually last for 1-2 weeks.

Structural service providers[27]: the EBA benefits from the services of external providers selected through public procurement procedures, mainly in ICT and Corporate Services. The EBA also holds a framework contract with an interim agency to purchase interim services use only under specific circumstances for limited period and in compliance with both the EU legal framework and French labour legislation.

Duration of employment: upon recruitment, Temporary Agents and Contract Agents engaged for permanent tasks are offered an initial contract period of three years with the possibility of renewal (first renewal for three years; second renewal for an indefinite period). The Chairman and Executive Director of the EBA have limited-term employment contracts. The EBA also hold the possibility to offer short-term contract to address time-bound tasks or temporary needs with the principle to renew the contract just once for a definite period.

Renewal of contract at the EBA follows a well-established procedure to ensure the transparent, consistent and fair treatment of all staff members when considering the potential renewal of an employment contract, and to safeguard a consistent decision-making process by the Appointing Authority. The renewal of a fixed-term contract is optional. The Executive Director, in his capacity as the Appointing Authority empowered to conclude contracts of employment, is under no obligation to offer a renewal of a fixed-term contract. The staff member is under no obligation to accept the offer of renewal.

Prior to a decision being made on the renewal of a fixed-term contract of indefinite duration, the following criteria are assessed: (i) the continuity of the post in the establishment plan of the EBA and in its organisational structure; (ii) the performance of the job holder; (iii) the competence(s) of the staff member in post and his/her suitability for the function as it is expected to evolve in the following years; and (iv) the needs of the EBA, paying particular attention to the possible evolution of the function (the potential increase or reduction in the activity) and the alignment of the competences of the staff member with the function as it is expected to evolve over the term of the contract. In addition to the above criteria, the availability of appropriations in the budget is also considered prior to issuing a final decision on the renewal of the contract.

B. Mobility

Mobility within the agency

The EBA Internal Mobility Policy serves the purpose of providing staff with career development opportunities, improving staff member's competencies, engagement and retention, as well as meeting the needs of the Authority in terms of performance of tasks and effective resources management, enabling the organisation to effectively adapt to an ever-changing environment. It also supports an open and

[26] https://eba.europa.eu/about-us/careers/national-experts-on-secondment.

[27] Structural service providers are not employed by the agency.

transparent corporate culture, cross-functional collaboration and information flow between services, enhancing knowledge sharing and project-based culture at the EBA.

Internal mobility at the EBA is legally grounded in Article 7 of the SR and is based on openness, transparency and equal opportunities. It can take different forms: at staff level (staff can express their interest in internal mobility to their line managers, either during the performance management or outside of it to HR); at management level (managers are responsible for identifying staff who might be considered for internal mobility in their teams. Once a year, after the closure of the appraisal exercise, HR convenes a dedicated Talent Review Meeting (TRM) at managerial level and chaired by the Executive Director with the objective to assess all staff's expression of interests for internal mobility vs the Authority's business needs); at organisational level (by means of internal publication on the organisation's intranet or internal transfer in the interest of the service as for instance a consequence of organisational change).

In 2023, 5 staff benefited from internal mobility.

Mobility among agencies (inter-agency mobility)

The legal framework for inter-agency mobility is covered in the implementing rule governing the engagement and use of temporary agents under Article 2(f) of the Conditions of Employment of Other Servants of the European Union.

The EBA publishes vacancies externally; however, in its vacancy notices, the Authority states that the relevant provisions of the above-mentioned implementing rule will apply if the successful applicant from the external selection procedure is already a member of temporary staff pursuant to Article 2(f) in another EU agency. The successful candidate is therefore given the opportunity to move to the EBA while maintaining their grade and career.

Mobility between the agency and other organisations

The EBA external Mobility Policy is an important component of the Agency's culture fostering staff's career development, knowledge sharing, and promoting a diverse and skilled workforce. It contributes to the advancement of the European financial sector and regulatory landscape by supporting increased cooperation between the EBA and external stakeholders, ultimately benefiting the broader European financial community. External mobility refers to the temporary assignment of staff from the EBA ("*the organisation of origin*") to an external entity ("*the host organisation*").

External mobility at the EBA is legally grounded in Articles 37, 38 of the SR and Article 51 of the CEOS and is based on openness, transparency and equal opportunities. It can take different forms: secondment in the interests of the service, staff exchange, long-term mission to other organisations, ECB-SSM onsite inspection missions.

The EBA does not have any official posts in its establishment plan, and thus not able to transfer officials from the Institutions. Temporary agent positions at the EBA may be occupied by officials from other institutions or temporary agents from other agencies who take leave on personal grounds.

In 2023, 9 staff benefitted from external mobility.

C. Performance appraisal and reclassification

Implementing rules in place:

		Yes	No	If no, other implementing rules in place
Reclassification of TA	Model Decision C(2015)9560	X		
Reclassification of CA	Model Decision C(2015)9561	X		

The 2023 Performance Management Cycle has been successfully closed on 26 June 2023. It started with the appraisal exercise (January – March) aiming at assessing staff's efficiency, ability and conduct; followed by the Talent Review meetings (April) identifying the "talent production line" moving forward and evaluating staff expression of interests for internal and external mobility; with as last step, the reclassification exercise (May-June).

The reclassification exercise, with the comparison of merits meeting, resulted in 14 TAs and 9 CAs reclassified, amounting to 12.72% of the 110 initially eligible TAs and 27.27% of 33 initially eligible CAs. Out of the 23 staff reclassified, 17 were female and 6 were male. The overall rate of female staff reclassified was 73.91% vs 53.84% (for 2022). The overall TA appeal rate was 1.8 % (2 appeals) vs 4.3% (for 2022). There were no CA appeals this year, 0% vs 3.1% of last year (2022).

The exercise was concluded, in compliance with the rules, by the Joint Committee meeting examining the results and processes. The reclassification changes were reflected in the salaries of July 2023.

As part of the EBA's commitment to strictly respect the rates indicated in Annex IB of the SR, all reclassified TAs met the indicative duration of career per type of post and grade. The focus was reflective of the need to ensure lower/intermediate TA grades career progression given that the AD5 to AD8 grades being the bulk of the TA population as well as on CA career perspectives with flexibility to slightly deviate from the guiding seniority duration to compensate limited career perspectives and longer time in grade. No reclassification could take place this year for TA/AST despite the clear focus on this.

Table - Reclassification of TA

Grades	2019 (N-5)	2020 (N-4)	2021 (N-3)	2022 (N-2)	2023 (N-1)	2024 (N)	Actual average over 5 years*	Average over 5 years (According to decision C(2015)9563)**
AD05	2.0	5.2	3.1	3.8	-		3.5	**2.8**
AD06	2.6	2.3	3.5	3.7	3.5		3.1	**2.8**
AD07	2.5	2.6	6.7	3.4	4.6		4.0	**2.8**
AD08	2.3	3.4	5.0	3.6	4.0		3.7	**3.0**
AD09	5.6	2.0	6.8	4.2	6.0		4.9	**4.0**
AD10	2.8	-	4.0	4.4	-		3.7	**4.0**
AD11	2.4	-	-	4.0	-		3.2	**4.0**
AD12	-	-	-	-	-		-	**6.7**
AD13	-	-	-	-	-		-	**6.7**
AST1	-	-	-	-	-		-	**3.0**
AST2	-	-	-	-	-		-	**3.0**
AST3	-	-	-	-	-		-	**3.0**
AST4	2.0	-	-	-	-		2.0	**3.0**
AST5	-	6.6	-	-	-		6.6	**4.0**
AST6	-	-	-	-	-		-	**4.0**
AST7	-	-	-	-	-		-	**4.0**

Grades	2019 (N-5)	2020 (N-4)	2021 (N-3)	2022 (N-2)	2023 (N-1)	2024 (N)	Actual average over 5 years*	Average over 5 years (According to decision C(2015)9563)**
AST8	-	-	-	-	-		-	4.0
AST9	-	-	-	-	-		-	N/A
AST10 (Senior assistant)	-	-	-	-	-			5.0
AST/SC1	-	-	-	-	-		-	4.0
AST/SC2	-	-	-	-	-		-	5.0
AST/SC3	-	-	-	-	-		-	5.9
AST/SC4	-	-	-	-	-		-	6.7
AST/SC5	-	-	-	-	-		-	8.3

* As figures for 2024 will only become available later, the averages are based on years 2019 to 2023.

**Evolution of reclassification averages shows progressive alignment with the average guiding seniority per grade in the Commission Decision. In grades with no reclassification this year (AD10, AD11, AST4) the alignment is slower.

Table - Reclassification of contract staff

Function Group	Grade	Staff in activity at 1.01.2022 (N-2)	How many staff members were reclassified in 2023 (N-1)	Average number of years in grade of reclassified staff members	Average number of years in grade of reclassified staff members according to Decision C(2015)9561
CA IV	17	4	-	-	Between 6 and 10 years
	16	2	1	4	Between 5 and 7 years
	15	6	3	3.8	Between 4 and 6 years
	14	23	4	3.7	Between 3 and 5 years
	13	7	1	2.9	Between 3 and 5 years
CA III	11	1	-	-	Between 6 and 10 years
	10	2	-	-	Between 5 and 7 years
	9	2	-	-	Between 4 and 6 years
	8	-	-	-	Between 3 and 5 years
CA II	6	-	-	-	Between 6 and 10 years
	5	-	-	-	Between 5 and 7 years
	4	-	-	-	Between 3 and 5 years
CA I	2	-	-	-	Between 6 and 10 years
	1	-	-	-	Between 3 and 5 years

D. Gender representation

Promoting and supporting diversity and inclusion are core values embedded in the EBA's mission and organisation: EBA strives to value, ensure equal treatment and opportunities to everyone, irrespective who they are and what they believe in.

The EBA is fully committed to the EU Commission's Gender Equality Strategy[28] to make significant progress towards a gender-equal Europe by 2025 and the UN's ambitious global target of achieving gender equality and empowering women by 2030.

Since the last quarter of 2020, the EBA has been very active embedding gender equality in its culture. Within a few years only, thanks to a strong intervention logic, the EBA has achieved a gender-equal leadership through different initiatives:

- Fostering an open and supportive culture: fighting discrimination (mandatory anti-harassment training), acknowledging and rewarding different leaderships, monitoring data/surveys with dedicated intranet/Teams' collaboration space, removing any gender-biased language and imagery in internal and external communications.
- Increasing managerial commitment with empowered champions in house and Staff Tool for managers to monitor and project gender and nationality staff evolution.
- Implementing Pool of talents diversification (gender balance in panels, advertise through diverse channels targeting female audience, train staff in panels to avoid bias, vacancy notice to be accompanied by video job ads with relevant focus on gender balance and inclusion, etc).
- Setting tone from the top and close steering with action plan (e.g.: meeting every week of the Gender Balance Working Group chaired by the Executive Director) and exchange with the Staff Committee.
- Offering development opportunities and exchange fora (organisation of the high-level conference of 7 March 2023 "Are we on the right track", Mentoring programme, female advocacy scheme, etc).
- Developing interactive platform (EBA intranet/website) for promoting best practices, sharing knowledge (with testimonial videos, data, etc).
- Providing work-life balance options (Hybrid working, childcare facilities, family disability support, return from maternity leave programme, etc.).
- Engaging closely with the European Institute for Gender Equality (EIGE) and key stakeholders (European Parliament FEMM committee, etc).

Increasing women's representation in decision-making positions at the Authority, helps building bridge in diversity resulting into a stronger EBA team working towards common values and goals. It also enriches the agency's culture opening new way of thinking, creativity, changing behaviour and challenging stereotypes.

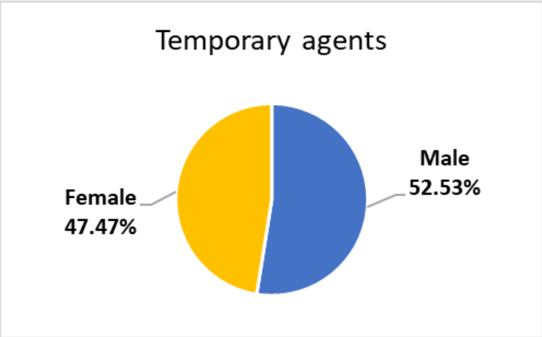
It contributes overall to recognise, respect and value difference thus portraying unity in diversity.

It increases the sense of belonging making staff feel valued, engaged and empowered thus creating inclusion and buy-in to the EBA community's identity.

The EBA has also adopted in 2023 the EUAN Charter on Diversity and Inclusion, embracing initiatives to address disability challenges.

[28] https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/gender-equality/gender-equality-strategy_en.

Table 1 - Data on 31/12/2023 of Statutory Staff (TAs and CAs)



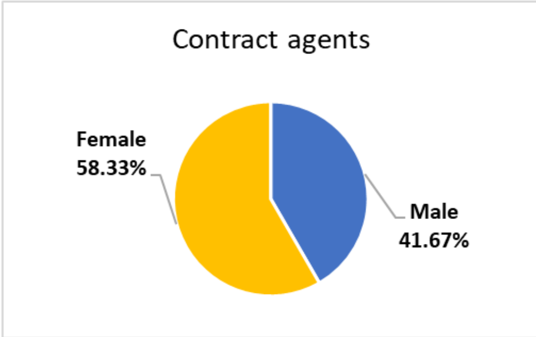
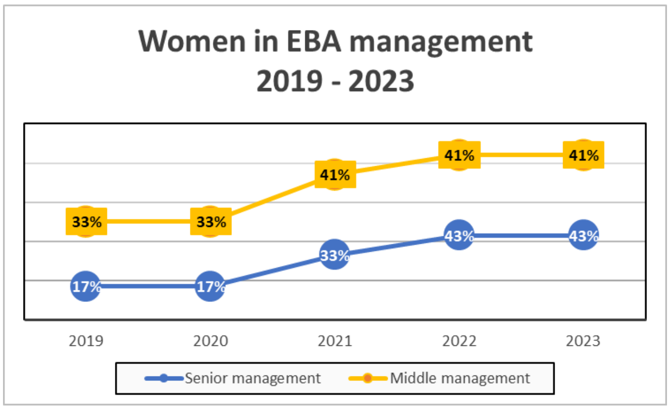


Table 2 - Data on gender evolution over five years of senior management (Chairperson, Executive Director, Directors) and middle management (Heads of Unit)



E. Geographical balance

Table 1 - Data on 31/12/23 – statutory staff only (TAs and CAs)

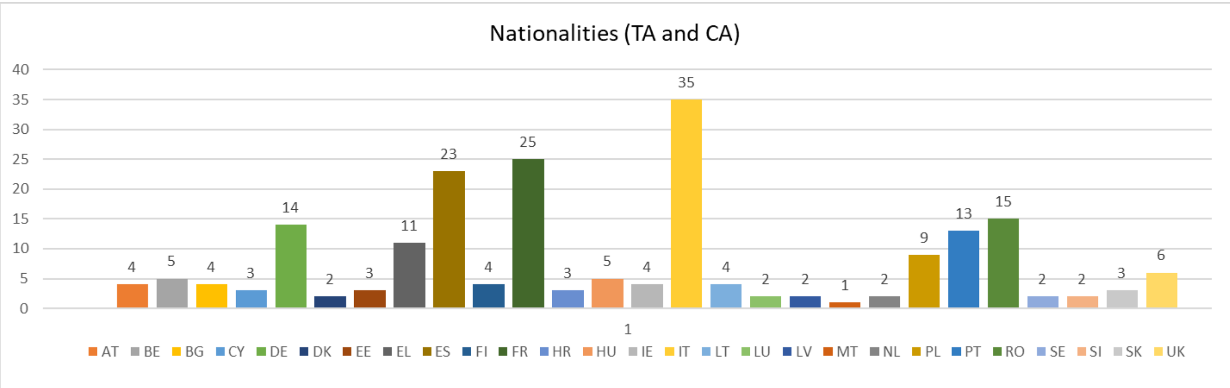


Table 2 - Evolution over five years of the most represented nationality in the Agency

Most represented nationality	2019 N-5		2023 N-1	
	Number	%	Number	%
Italian	35	17%	35	17%

F. Schooling

Agreement in place with the European School(s) of Paris 'La Défense'	
Contribution agreements signed with the EC on type I European schools	No
Contribution agreements signed with the EC on type II European schools	Yes
Number of service contracts in place with international schools:	Nine agreements for primary and secondary education 17 agreements with nurseries

The EBA considers schooling to be an essential part of its staff policy. For this purpose, the "European School la Défense" has been granted accreditation for all levels from "Maternelle" to the European Baccalaureate. A full nursery, primary and secondary education cycle is available for the English section while beside a full nursery and primary, a secondary cycle is opening gradually for the French section. Hence, the EBA is maintaining exceptionally its education contribution policy to certain staff members under certain conditions (e.g., if the child is in the final two years of the secondary cycle or the child attends a significant part of the school activities (equal to/more than 70%) in a language other than those offered by the European School in Paris.

The EBA continues to work on direct agreements with schools and nurseries in Paris. On the basis of these agreements, the EBA pays tuition fees up to the threshold directly to the nurseries/schools. The amounts exceeding the threshold will be borne by staff members.

School year 2023-2024:

Nursery: up to 4 years old	26
Maternelle: more than 4 years old and up to 6 years old	21
Primary: More than 6 years old and less than 11 years old	46
Secondary: More than 11 years old and less than 19 years old	62
Total	155

ANNEX VI: PROCUREMENT PLAN

The list below shows existing contracts with a value above EUR 15,000 that will expire in 2025 or the first half of 2026 and the EBA will need to replace. The possibility of joint procurement has been identified however it is not known at this point in which procedures other entities would participate. It is EBA procurement policy to open up procurement procedures to other EU entities to the greatest extent possible. To this end, the EBA regularly updates its procurement planning on the EBA website and in the procurement portal on the EU Agencies Network website. The estimated value is the EBA ceiling and does not take account of volumes that would be required by other participating entities.

Service/supply	Procedure	Contract type	Estimated value (EUR)	Joint procurement
Existing contracts				
Electricity from renewable sources	Open	Direct (32 months)	TBC	Yes
Data protection services	Open	Framework (4 years)	600 000	Yes
Coffee grains and machines rental	Negotiated	Framework (4 years)	60 000	Possible
Waste management	Negotiated	Framework (4 years)	60 000	Possible
Office plants and flowers	Negotiated	Framework (4 years)	60 000	Possible
Blockchain analytics services and crypto-asset markets data	Open	Framework (4 years) (	250 000	Possible
Insurance broking services	Negotiated	Framework (4 years)	60 000	Possible
Medical services	Open	Framework (4 years)	400 000	Yes
Mystery Shopping	Open	Framework (4 years)	800 000	Possible
Market survey - office space	Negotiated	Direct	30 000	No
New contracts				

For contracts ending in 2025 or the first half of 2026 that were procured by other EU institutions, agencies, and bodies, it is assumed that the lead entity of the latest procurement will launch a procedure for successor contracts.

The EBA also sees that 1 negotiated procedure with a value in the range 1-15 KEUR is planned in 2025.

ANNEX VII: ENVIRONMENT MANAGEMENT

Strategy

The EBA has an important role in supporting the European banking sector towards the objectives of transitioning to a more sustainable economy and mitigating risks stemming from climate change and broader environmental, social and governance factors.

Following its successful EMAS registration in 2022, the EBA is committed to continuously improving its environmental performance and reducing its carbon footprint.

In its Environmental Policy, the EBA committed to developing knowledge, finding technical solutions, and adjusting its organisation and behaviours, focusing on the following:

- Minimising impact on greenhouse gas emissions, with a special focus on travel
- Building a strong relation with its landlord to improve energy consumption performance
- Improving its waste production, segregation and recycling as expected by the EBA’s staff
- Maximising the use of electronic solutions and green public procurement to limit its material impact
- Implementing ESG considerations in policy making, risk assessment and supervisory convergence work in line with the EBA’s tasks, and mandates in the area of sustainable finance.

The EBA set up key environmental indicators with concrete objectives to demonstrate the efficiency and effectiveness of its environmental management system. The Agency ensures compliance with all applicable local and European Union environmental regulations.

Environmental objectives and targets

Improvement area	2025 environmental objectives
Horizontal	Sustainability reporting standards are introduced at the EBA (objective moved from 2024 to 2025)
Travel	The EBA capabilities to reduce its travel-related GHG emissions are improved.
Energy	The measurement of energy-related data is automated.
IT, procurement & waste	The circular economy policy at the EBA is implemented and reported.
Core business/ ESG	The KPI for the EBA's participation to external events with ESG component is established.

ANNEX VIII: BUILDING POLICY

Following its physical relocation from London, the EBA occupies four floors (24, 25, 26 and 27) of the office space in Tour Europlaza (Paris, France) and has operated from those premises since 3 June 2019.

#	Building name and type	Location	Surface area (in m2)			Rental contract					Host country (grant or support)
			Office space	Non-office	Total	Rent (EUR/year)	Duration of the contract	Type	Breakout clause Y/N	Conditions attached to the breakout clause (if applicable)	
1	Tour Europlaza, High-rise, multi-tenancy building	Paris, France	3 995 [29] square metres	1 408 [30] square metres	Net office space: 5 403 square metres	EUR 519.42 [31] per square metre Annual cost = EUR2 806 447	9-year	Lease contract	Y	The EBA may terminate the rent at the end of the six-year lease term by giving the landlord no less than 12 months' notice to that effect if, at the time the notice is delivered, Article 7 of Regulation (EU) No 1093/2010 has been amended in the ordinary legislative process of co-decision by the EP and the European Council so that the EBA's seat is no longer in France. In this case, the EBA must pay the landlord a lump sum in compensation corresponding to (i) 22 months of the rental concessions and (ii) the dilapidation flat fee of EUR 200 per square metre, to be indexed to the *indice des*	French government provided EUR 1.5 million of financial support for lease and fit-out costs. Moreover, it contributes to up to EUR 7 million of rental costs during the first nine years of the lease.

[29] Reception / Lobby 184m2; Meeting rooms - Visitors 527m2; Internal meeting rooms 417m2; Storage / Print rooms/ Corridors 1,183m2; Break out area visitors 202m2; Break out area staff 65m2; Open Plan (including individual offices) 1,416m2.

[30] 1,341m2 shared areas including lift banks, 67m2 archives (at basement level minus 4).

[31] Rent per sq. m including indexation (https://www.insee.fr/fr/statistiques/serie/001617112), as specified in the Lease Agreement, including cost of archives, car parking charges but the restaurant charges are not included.

#	Building name and type	Location	Surface area (in m2)			Rental contract					Host country (grant or support)
			Office space	Non-office	Total	Rent (EUR/year)	Duration of the contract	Type	Breakout clause Y/N	Conditions attached to the breakout clause (if applicable)	
										loyers des activités tertiaires (ILAT).	

ANNEX IX: PRIVILEGES AND IMMUNITIES

<table>
<tr><th rowspan="2">Agency privileges</th><th colspan="2">Privileges granted to staff</th></tr>
<tr><th>Protocol of privileges and immunities/diplomatic status</th><th>Education/day care</th></tr>
<tr><td>Refunds of value added tax (VAT) for purchases of goods and services for the agency, including vehicles</td><td>• Importation of personal effects including motor vehicles free of customs duty and VAT
• Special vehicle registration
• A special residence permit</td><td>An Accredited European School was created by the French State in La Défense, Paris. The Mandate and Service Agreement between the EBA and the Commission was concluded in November 2020, facilitating the payment of an EU financial contribution towards the Accredited European School Paris La Défense. The Accredited European School grants free-of-charge priority enrolment for the children of the EBA staff. The Accredited European School then grants free-of-charge priority enrolment for the children of EBA staff.

For children who do not attend this school, education allowances are determined and paid when due.</td></tr>
</table>

ANNEX X: EVALUATIONS

The EBA is subject to regular reviews by the EU institutions, in accordance with Article 81 of the EBA (and other two ESAs) Regulations. The most recent assessment report on the operation of the European Supervisory authorities (ESAs) was published on 23 May 2022 [32].

In this report, the Commission concluded that: ' Since the last ESA review in 2019, the ESAs have continued to perform their tasks efficiently and effectively, including during the recent challenging circumstances caused by the COVID19 pandemic.'

The Commission also identified 'some areas where improvements could be implemented with no need for legislative changes, and will cooperate with the ESAs to assess this further, mainly with the aim 'to promote supervisory convergence and consistent supervision, which is a key building block in creating a genuine Capital Markets Union.'

In particular, the Commission underlined the increasing number of cross-sectoral tasks and topics that must be dealt with by the ESAs as part of the Joint Committee. As a consequence, the Commission invited the ESAs to reflect on desirable changes that could be made to the framework in the future to ensure sufficient resources and improve the decision-making process. The Commission also invited the ESAs to provide their advice to the Commission by the end of 2023.

The ESAs made progress in fostering supervisory convergence in the area of enforcement, amongst others, and supervisory independence, including through the development of joint criteria that since then, have been adopted and published on ESAs' websites[33].

Partial progress was also made regarding the recommendation to consider ways to ensure sufficient resources and improve decision-making in the JC, although the scope of action is limited given that the legal framework sets clear rules on the JC's governance and functioning. In the absence of legislative changes, the ESAs have therefore been focusing on enhancing good governance and efficient operations within the JC on aspects under the ESAs' control that do not require legislative changes.

Further accountability and evaluations are ensured via following institutions and channels:

- European Parliament, in its role as authority responsible for the discharge of the EBA's financial statements, but also by way of the yearly hearing the EBA Chairman attends at the EPs ECON committee

- The European Court of Auditors and the European Commission's Internal Audit Services and the yearly audits.

- Publication of the EBA'S Consolidated Annual Activity Report (and Annual Report) which provide(s) an overview of the execution of the work programme and more detail on the above external evaluations.

[32] https://finance.ec.europa.eu/system/files/2022-05/220523-esas-operations-report_en.pdf.

[33] Joint Committee of the ESAs, 'Joint European Supervisory Authorities' criteria on the independence of supervisory authorities' (https://www.eba.europa.eu/sites/default/documents/files/document_library/Publications/Other%20publications/2023/1063223/JC%202023%2017%20Joint%20ESAs%20Supervisory%20Independence%20criteria.pdf, JC 2023 17, 25 October 2023.

ANNEX XI: ORGANISATIONAL MANAGEMENT AND INTERNAL CONTROLS

Organisation management

The EBA is represented by its Chairperson who is responsible for preparing the work of the BoS. This includes inter alia setting the agenda to be adopted by the BoS, convening meetings and tabling items for decisions, and chairing the meetings. The chairperson also proposes the agenda of the MB and chairs its meetings.

The Executive Director is in charge of the management of the Authority and prepares the work of the MB.

Since 1 June 2021, following an internal reorganisation, the EBA's management team consists of five directors and 17 heads of unit, as follows:

- Five directorates:
    - **Prudential Regulation and Supervisory Policy**, consisting of three units: *Liquidity, leverage, loss absorbency and capital*; *Risk-based metrics*; and *Supervisory review, recovery and resolution*.
    - **Innovation, Conduct and Consumers, consisting of three units:** *Digital Finance; Conduct, Payments and Consumers;* and *AML/CFT.*
    - **Economic and Risk Analysis,** consisting of three units: *Economic Analysis and Impact Assessment, Risk Analysis and Stress Testing;* and *ESG Risks.*
    - **Data Analytics, Reporting and Transparency***, consisting of two units: Statistics; and Reporting and Transparency.*
    - **Operations**, consisting of four units: *Corporate support*; *Finance and procurement*; *Human resources*; and *Information technology*.
- Two additional units - *Legal and Compliance* and *Governance and External Affairs* - and the *Accounting Officer* report directly to the Executive Director.

The management team oversees the EBA's activities and ensures that control standards are met. It meets on a weekly basis in various formats. The EBA's management plays a key role in fostering the implementation of the anti-fraud strategy and policy. The Ethics officer supports the EBA's management in these tasks.

In January 2021, the EBA reorganised its internal control framework. Its Legal unit became the Legal and Compliance unit. Within the unit, a dedicated Risk and Compliance unit was created. It was tasked with new responsibilities in the risk and compliance areas, in particular ethics, data protection, risk management, and anti-fraud. The unit's staffing was increased and its head became the Ethics officer, thus bringing more seniority to the role.

Internal control

The EBA's internal control framework applies to all the agencies' activities, financial as well as non-financial. Its overall objective is to ensure that the organisation achieves its business, operational and financial objectives respecting rules and regulations. It supports sound decision-making, taking into account risks to the achievement of these objectives and reducing them to acceptable levels through cost-effective controls. The framework supplements the Financial Regulation and other applicable rules and regulations and is aligned on the EC's standards which are themselves based on the international standards set by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

The internal control framework consists of five internal control components and 17 principles based on the COSO 2013 Internal Control-Integrated Framework. The five internal control **components** are: i) the control environment; ii) the risk assessment; iii) the control activities; iv) information and communication; and v) monitoring activities.

To facilitate the implementation of the internal control framework and management's assessment of whether or not each component is present and functioning, each component consists of several principles, which specify the actions required for internal control to be effective. For each principle, characteristics are defined to assist management in implementing internal control procedures and in assessing whether or not the principles are present and functioning. For each principle, baselines are set, expressed in terms of indicators, which are quantitative whenever it is possible and used to assess the EBA internal control system on an annual basis.

While compliance remains an important requirement, the future objectives are focused on assessment, monitoring of the activities and optimisation of controls.

Risk management

The EBA revamped its risk management (RM) framework in 2022 with the design and implementation of an enterprise risk management (ERM) system aligned with the COSO 2017 ERM framework, adopting a new risk management policy, a risk appetite framework incorporating a risk appetite statement, and the initial set of strategic risks identified under the updated framework.

In 2023, the EBA completed the first cycle of its comprehensive RM assessment of its operations based on the new system, thus developing and implementing action plans where strategic risks fall outside the risk tolerances adopted, reviewing the strategic risk register and continuing to identify and evaluate additional potential risks that could materialise within the organisation. This resulted in an overview of aggregated risks which in turn will allowed management to focus on the areas that pose a greater risk (i.e., significant and/or material) to the EBA's Work Programme and wider operations. This will be carried out at the strategic level, while also looking at how the principles of risk management can be embedded in a proportionate way in local areas, including through consideration of the risks in individual Work Programme activities.

These processes will be continuously reviewed and updated through 2025 to 2027, putting the EBA in a better position to enhance the alignment, integration, and coordination of risks among its functions and business units, which should lead to it being embedded in the strategic planning process.

Anti-fraud & ethics

The EBA's Anti-Fraud Strategy, adopted in 2020, provides the foundation for all activities that the EBA carries out in respect of fraud risks. It is based on four main objectives, namely a) prevent, b) detect and investigate, c) recover, mitigate and respond, and d) exploit.

The main activity is the annual anti-fraud risk assessment, whereby the entire organisation engages in an exercise to identify activities and processes that could result in fraud and evaluate them to find out the level of fraud risk that they carry. In the case of identifying material or significant risks, the unit/team owning the risk needs to design and implement an action plan that feeds into the next anti-fraud risk assessment exercise. In 2023 some of the activities and processes that until now have been included in the anti-fraud risk assessment became an integral part of the RM assessment. This should in turn help the organisation focus on those risks that indeed pose fraud risk. The anti-fraud risk strategy will be reviewed in 2024 to take into account OLAF guidelines.

Anti-fraud training was delivered in 2023 in conjunction with the EBA's annual mandatory ethics training programme.

In 2023 the EBA reviewed its ethics guidelines and maintained the existing framework pending consideration of adaptations that will be needed to take into account the additional oversight and supervisory roles accorded to the EBA through DORA and MiCAR and the particular ethical issues to which these new tasks may give rise as they are implemented.

Data protection

The EBA will continue to ensure effective implementation of data protection requirements applicable to it through its system of delegated data controllers, data protection coordinators within business areas and Data Protection Officer supported by a Risk & Compliance team. The EBA will continue to develop and improve its internal arrangements for processing personal data and for reviewing those processing operations. Significant new or amended processing operations are likely to require analysis of changes to the EBA's IT infrastructure and the implementation of DORA and MiCAR.

ANNEX XII: PLAN FOR GRANT, CONTRIBUTION AND SERVICE-LEVEL AGREEMENTS

	General information [1]					Financial and HR impacts				
	Actual or expected date of signature	Total amount	Duration	Counterpart	Short description		2024 Year N	2025 Year N+1	2026 Year N+2	2027 Year N+3
Grant agreements										
1. XXX						Amount				
						Number of CA				
						Number of SNEs				
2. XXX						Amount				
						Number of CA				
						Number of SNEs				
….						Amount				
						Number of CA				
						Number of SNEs				
Total grant agreements						Amount	0	0	0	0
						Number of CA	0	0	0	0
						Number of SNEs	0	0	0	0
Contribution agreements										
1. XXX						Amount				
						Number of CA				
						Number of SNEs				
2. XXX						Amount				
						Number of CA				
						Number of SNEs				
….						Amount				
						Number of CA				
						Number of SNEs				
Total contribution agreements						Amount	0	0	0	0
						Number of CA	0	0	0	0
						Number of SNEs	0	0	0	0

	General information [1]					Financial and HR impacts				
	Actual or expected date of signature	Total amount	Duration	Counterpart	Short description		2024 Year N	2025 Year N+1	2026 Year N+2	2027 Year N+3
Service-level agreements										
1. EU Supervisory Digital Finance Academy	9/14/2022	1079515	Four years	DG REFORM	Providing support to 20 Member States to strengthen supervisory capacity in the area of innovative digital finance	Amount	356,119	329,939		
						Number of TA	1	1		
						Number of CA	1	1		
						Number of SNEs				
2. XXX						Amount				
						Number of CA				
						Number of SNEs				
….						Amount				
						Number of CA				
						Number of SNEs				
Total contribution agreements						Amount	356,119	329,939		
						Number of TA	1	1		
						Number of CA	1	1		
						Number of SNEs	-	-		
TOTAL						**Amount**	**356,119**	**329,939**		
						Number of TA	**1**	**1**		
						Number of CA	**1**	**1**		
						Number of SNEs	**-**	**-**	**-**	

1. For on-going agreements, please provide the requested general information. For expected agreements, please provide the information available. When the information is not known, please put "not known".

ANNEX XIII: STRATEGY FOR COOPERATION WITH THIRD COUNTRIES AND INTERNATIONAL ORGANISATION

Strategy for cooperation with third countries

In recent years, the EBA has been active in the assessment of the equivalence of third countries, both with regard to the regulatory/supervisory framework for preferential treatment of certain exposures and for the confidentiality and professional secrecy regime of third-country authorities, to facilitate their attendance of EU supervisory colleges.

The last ESAs review has further strengthened the EBA's competences vis-a-vis third countries by i) entrusting the EBA with the task of continuously monitoring third-country regulatory and supervisory frameworks and ii) establishing a closer link between the work on equivalence and relevant cooperation agreements with supervisory authorities from non-EU countries.

The experience gained by the EBA in carrying out the equivalence assessment process has highlighted the importance of establishing arrangements with third countries, to facilitate effective cooperation and information exchange and to enable follow-up monitoring.

The EBA relies on an 'equivalence engagement model' to reach out to third countries and establish a close link between the equivalence assessment and the need to have cooperation arrangements in place. In this approach, a cooperation arrangement is the outcome of a positive equivalence assessment. In turn, having consistent cooperation arrangements in place with third countries helps to monitor countries that have already been assessed as equivalent, which is going to be the focus of the EBA's work on equivalence going forward. The monitoring activities will focus on relevant regulatory and supervisory developments and market developments in third countries and will take into account the implications for financial stability, market integrity, investor protection and the functioning of the internal market.

Strategy for cooperation with international organisations.

The ESAs review encouraged the EBA to intensify its cooperation with international organisations by representing 'the interest of the Union in the international fora'.

BASEL COMMITTEE ON BANKING SUPERVISION (BCBS)

The BCBS: The BCBS is the primary global standard-setter for the prudential regulation of banks and provides a forum for regular cooperation on banking supervisory matters.

The EBA at the BCBS: The EBA has an observer role at the Basel table. It participates in the BCBS meetings, as well as in relevant subgroups and working groups. In order to best represent the interest of the EU and its Member States, European participants at the Basel table coordinate beforehand to better voice the EU interest

The EBA's main objectives at the BCBS: To ensure a fair representation of EU interests in the shaping of global standards and to draw on best international practices and information for setting EU regulation.

FINANCIAL STABILITY BOARD (FSB)

The FSB: The Financial Stability Board (FSB) is an international body that monitors and makes recommendations about the global financial system.

The EBA at the FSB: The EBA is a member of the Resolution Steering Group of the FSB (ReSG). ReSG is the primary global forum for the development of standards and guidance for resolution regimes, and for recovery/resolution planning/execution for systemically important financial institutions (SIFIs), including banks, insurers and financial market infrastructures (FMIs). It seeks to develop, issue, and maintain standards and guidance, monitor resolvability and crisis preparedness, build trust between home and host authorities, and serve as a knowledge-sharing forum for resolution authorities and other authorities with a role in crisis management.

In addition to its role in the Steering Group, the EBA also participates in the Cross Border Crisis Management group (CBCM), one of the three main sub-groups of ReSG (alongside corresponding groups for financial market infrastructures and insurance).

The EBA's main objectives at the FSB: The EBA brings its knowledge of policy and practices in European recovery and resolution planning to the table of the FSB for the purpose of developing policy and monitoring compliance with international standards. It works closely with the EC in this respect and also coordinates with the Single Resolution Board. The core objective is to ensure that post-crisis reforms are developed and implemented to deliver high-quality crisis management structures with the objective of minimising disruption to the financial system and protecting taxpayers' interests.

INTERNATIONAL MONETARY FUND (IMF)

The IMF: The International Monetary Fund ensures the stability of the international monetary system, the system of exchange rates and international payments that enables countries to transact with each other.

The EBA's main objectives with the IMF: The EBA provides data on the euro area to the IMF for its annual Article IV consultation on the euro area, which assesses the financial health of the euro area, its current development and economic forecasts. As well as strong cooperation on the aforementioned publication, the EBA's top management holds recurrent bilateral meetings with the IMF's top management for European affairs to discuss EU policies and economic issues.

ANNEX XIV: EBA ROADMAP ON STRENGTHENING THE PRUDENTIAL FRAMEWORK (CRD VI/CRR III) – EXTRACT: FULL LIST OF MANDATES BY AREA[34]

Credit risk

Area	Product	Reg.	Article	Deliverable	Legal deadline
				Phase 1	
Credit risk	Report	CRR	506	Report to the Commission on the eligibility and use of policy insurance as credit risk mitigation techniques	0 months after entry into force
Credit risk	ITS	CRR	20(8)	ITS on joint decision process for internal model applications	12 months after entry into force
Credit risk	RTS	CRR	111(8)	RTS on criteria that institutions shall use to assign off-balance-sheet items, constraining factors for UCC and notification process	12 months after entry into force
Credit risk	Guidelines	CRR	123(1)	Guidelines to specify proportionate diversification methods for retail definition	12 months after entry into force
Credit risk	RTS	CRR	124(12)(sub 1)	RTS to specify the term "equivalent legal mechanism" in place to ensure that the property under construction will be finished within a reasonable time frame	12 months after entry into force
Credit risk	Guidelines	CRR	126a(3)	Guidelines specifying the terms substantial cash deposits, appropriate amount of obligor-contributed equity and significant portion of total contracts	12 months after entry into force
Credit risk	Guidelines	CRR	178(7)(sub 1)	Guidelines on the definition of default, in particular for diminished financial obligation	12 months after entry into force

[34] The mandates in the banking package will in most cases depend on the entry into force in the Official Journal, e.g. the deadline of a mandate will be 12, 18, 24 etc. months after entry into force of the banking package. For a few mandates, typically where a high priority is given to the mandates by co-legislators, a specific date is envisaged. For convenience, these specific dates have been formatted into a relative date in the Annex (under assumption of Q2 2024 entry into force).

Area	Product	Reg.	Article	Deliverable	Legal deadline
				Phase 2	
Credit risk	RTS	CRR	124(9)	RTS to specify the types of factors to be considered for risk weights for exposures secured by mortgages on immovable property	18 months after entry into force
Credit risk	RTS	CRR	143(5)	RTS to specify the conditions for assessing the materiality of the use of an existing rating system for other additional exposures and changes to rating systems under the IRB approach	18 months after entry into force
Credit risk	Guidelines	CRR	181(4a)	Guidelines on artificial cash flow and discount rate	18 months after entry into force
Credit risk	RTS	CRR	122a(4)(1)	RTS on criteria for high-quality project finance specialised lending exposures	24 months after entry into force
Credit risk	RTS	CRR	144(2)	RTS to specify the assessment methodology for compliance with the requirements to use the IRB	24 months after entry into force
Credit risk	RTS	CRR	147(8)	RTS on the categorisation to PF, OF and CF, and the determination of IPRE	24 months after entry into force
Credit risk	RTS	CRR	153(9)(1)	RTS on how to take into account the factors when assigning risk weights to specialised lending exposures	24 months after entry into force
Credit risk	RTS	CRR	173(3)(sub 2)	RTS on methodologies to assess the integrity of the assignment process and the regular and independent assessment of risks	24 months after entry into force
Credit risk	RTS	CRR	180(3)	RTS to specify the methodology of an institution for estimating PD under Article 143	24 months after entry into force
Credit risk	Report	CRR	495b(2)	Report on the appropriate calibration of risk parameters applicable to specialised lending exposures under the IRB	24 months after entry into force
Credit risk	Report	CRR	506cb	Report on the recognition of capped or floored unfunded credit protection	24 months after entry into force

Area	Product	Reg.	Article	Deliverable	Legal deadline
Credit risk	Report	CRR	506cc	Report on the impact of the new framework for securities financing transactions in terms of capital requirements	24 months after entry into force
				Phase 3	
Credit risk	Guidelines	CRR	182(5)	Guidelines to specify the methodology institutions shall apply to estimate IRB-CCF	30 months after entry into force
Credit risk	Report	CRR	506c	Report to the Commission on the consistency with the current measurement of credit risk	30 months after entry into force
Credit risk	RTS	CRR	147(11)(1)	RTS on specifying further the conditions and criteria for assigning exposures to the IRB exposure classes	36 months after entry into force
Credit risk	RTS	CRR	157(6)	RTS on the calculation of the risk-weighted exposure amount for dilution risk of purchased receivables	36 months after entry into force
Credit risk	RTS	CRR	229(4)	RTS on comparable property	36 months after entry into force
Credit risk	Report	CRR	495c(2)	Report on the appropriate calibrations of risk parameters associated with leasing exposures under the IRB approach	36 months after entry into force
				Phase 4	
Credit risk	Report	CRR	126(1)	Report on appropriateness of the treatment of exposures secured by mortgages on commercial property	42 months after entry into force
Credit risk	Report	CRR	505(1)(sub 2)	Report on the impact of the requirements on agricultural financing (intermediary report)	42 months after entry into force
Credit risk	Guidelines	CRR	150(2)	Guidelines on immateriality of size and risk profile of exposures	48 months after entry into force
Credit risk	Report	CRR	36(5)sub4	Monitor the activity of specialised debt restructurers and report on the results of such	54 months after entry into force

Area	Product	Reg.	Article	Deliverable	Legal deadline
				monitoring activity of specialised debt restructurers	
Credit risk	Report	CRR	465(5)(sub 5)	The EBA to monitor and report on the use of the transitional treatment and appropriateness of risk weights for exposures secured by residential property	54 months after entry into force
Credit risk	Report	CRR	495d(2)	Report on transitional arrangements for unconditional cancellable commitments	54 months after entry into force
Credit risk	Report	CRR	465(3)(sub 2)	The EBA to monitor and report on credit assessments by nominated ECAIs for exposures to corporates	60 months after entry into force
Credit risk	Report	CRR	495b(3)(sub 4)	Report on object finance	72 months after entry into force
Credit risk	Report	CRR	505(1)(sub 1)	Report on the impact of the requirements on agricultural financing	72 months after entry into force
Credit risk	Other	CRR	124(7)(sub 3)	Notification to the EBA on risk adjustment and criteria on exposures secured by mortgages on immovable property and EBA opinion	No deadline
Credit risk	Guidelines	CRR	169(3)	Guidelines on how to apply requirements on model design, risk quantification, validation and application of risk parameters	No deadline
Credit risk	Guidelines	CRR	177(2a)(sub 2)	Guidelines on ESG scenarios for stress tests used in assessment of capital adequacy	No deadline
Credit risk	Guidelines	CRR	181(4)	Guidelines to clarify the treatment of any form of funded and unfunded credit protection	No deadline
				Ongoing	
Credit risk	Other	CRR	108(3)	Publish list of eligible protection providers	Ongoing
Credit risk	Other	CRR	115(2)	Maintenance of a publicly available database of EU regional governments and local authorities treated as exposures to their central governments	Ongoing

Area	Product	Reg.	Article	Deliverable	Legal deadline
Credit risk	Other	CRR	116(4)	Maintenance of database of all PSEs	Ongoing
Credit risk	Other	CRR	154(4)(2)	NCAs shall share information on the typical characteristics of qualifying revolving retail loss rates with the EBA	Ongoing
Credit risk	Other	CRR	36(5)sub3	Establish, maintain and publish the list of specialised debt restructurers	Ongoing

Market risk

Area	Product	Reg.	Article	Deliverable	Legal deadline
				Phase 1	
Market risk	RTS	CRR	325u(6)	RTS on conditions to determine that an instrument is a hedging position	0 months after entry into force
Market risk	RTS	CRR	325az(9)	RTS on extraordinary circumstances for FRTB-IMA	0 months after entry into force
Market risk	RTS	CRR	94(10)	RTS on the specification of long and short positions	12 months after entry into force
Market risk	RTS	CRR	279a(3)(a)	RTS on supervisory delta for commodity prices	12 months after entry into force
Market risk	RTS	CRR	325(9)	RTS on FX and commodity risk in the banking book	12 months after entry into force
Market risk	RTS	CRR	325be(3)	RTS on risk factor modellability	12 months after entry into force
Market risk	RTS	CRR	325bg(4)	RTS on profit and loss attribution	12 months after entry into force
Market risk	RTS	CRR	501d(5)(sub 1)	RTS on crypto	12 months after entry into force

Area	Product	Reg.	Article	Deliverable	Legal deadline
				Phase 2	
Market risk	RTS	CRR	325bc(6)	RTS on data inputs	18 months after entry into force
Market risk	RTS	CRR	104c(4)	RTS on structural FX	24 months after entry into force
Market risk	RTS	CRR	325bf(10)	RTS on conditions for not counting overshootings	24 months after entry into force
Market risk	RTS	CRR	34(4)	RTS on extraordinary circumstances for prudent valuation	24 months after entry into force
Market risk	RTS	CRR	382(6)	RTS on SFTs for CVA risk	24 months after entry into force
				Phase 3	
Market risk	RTS	CRR	325j(7)	RTS on the hypothetical portfolios of CIUs in the trading book	30 months after entry into force
Market risk	Report	CRR	519d	Report on haircut floors for SFTs	30 months after entry into force
Market risk	RTS	CRR	104(8)	RTS on net short credit and equity positions	36 months after entry into force
Market risk	Guidelines	CRR	104a(1)	Guidelines on exceptional circumstances for the reclassification of a position	36 months after entry into force
Market risk	RTS	CRR	383a(3)(a)	RTS on proxy spread	36 months after entry into force
Market risk	RTS	CRR	383a(3)(b)	RTS on further technical elements for regulatory CVA	36 months after entry into force
Market risk	RTS	CRR	383a(3)(c)	RTS on instruments appropriate to estimating PDs	36 months after entry into force
				Phase 4	
Market risk	RTS	CRR	325c(5b)	RTS on assessment methodology for the FRTB-SA	48 months after entry into force

Area	Product	Reg.	Article	Deliverable	Legal deadline
Market risk	RTS	CRR	383a(5)(a)	RTS on the materiality of extensions and changes for the SA-CVA	48 months after entry into force
Market risk	RTS	CRR	383a(5)(b)	RTS on assessment methodology for the SA-CVA	48 months after entry into force
Market risk	Report	CRR	325u(7)	Report on the exemption from residual risks for hedging positions	66 months after entry into force
Market risk	Guidelines	CRD	104(3)	Guidelines on excessive CVA risk	No deadline
Market risk	RTS	CRD	77(4)	RTS on the definition of material exposures to default risk and thresholds for material counterparties and positions in traded debt or equity instruments	No deadline

Operational risk

Area	Product	Reg.	Article	Deliverable	Legal deadline
				Phase 2	
Operational risk	RTS	CRR	314(6)	RTS on the elements to calculate the business indicator components	18 months after entry into force
Operational risk	ITS	CRR	314(7)	RTS on mapping BIC components to FINREP	18 months after entry into force
Operational risk	RTS	CRR	315(3)	RTS on adjustments of the BIC	18 months after entry into force
Operational risk	RTS	CRR	316(3)	RTS on calculation of aggregated losses above 750k and unduly burdensome exemption	18 months after entry into force
Operational risk	RTS	CRR	317(9)	RTS establishing a risk taxonomy of operational risk loss events	18 months after entry into force
				Phase 3	
Operational risk	RTS	CRR	320(3)	RTS on the exclusion of losses	30 months after entry into force

Area	Product	Reg.	Article	Deliverable	Legal deadline
Operational risk	RTS	CRR	321(2)	RTS on the adjustments to the loss dataset	30 months after entry into force
Operational risk	RTS	CRR	323(2)	RTS on the risk management framework	30 months after entry into force
				Phase 4	
Operational risk	Report	CRR	519e	Implementation report on the use of insurance in the context of operational risk and the availability and quality of data when calculating their own funds requirements for operational risk	42 months after entry into force
Operational risk	Report	CRR3	314(2a)	Report on operational risk ILDC	72 months after entry into force
Operational risk	Guidelines	CRR3	317(10)	Guidelines on governance arrangements to maintain the loss dataset	No deadline

Reporting and disclosure

Area	Product	Reg.	Article	Deliverable	Legal deadline
				Phase 1	
Reporting	ITS	CRR	430(7)(1)Part 1	(Part 1) ITS on supervisory reporting – Basel III relevant	0 months after date of application
P3 Data Hub	Other	CRR	433(2)	The EBA shall publish annual, semi-annual and quarterly disclosures on its website.	0 months after date of application
P3 Data Hub	Other	CRR	434(1)(3)	The EBA shall publish semi-annual and quarterly disclosures on financial reports. The EBA shall prepare and keep up to date a mapping tool.	0 months after date of application
P3 Data Hub	Other	CRR	434(3)	The EBA shall publish on its website the disclosures of small and non-complex institutions on the basis of the information reported by those institutions.	0 months after date of application

Area	Product	Reg.	Article	Deliverable	Legal deadline
P3 Data Hub	Other	CRR	434(4)	The EBA shall make available on its website the information required to be disclosed in accordance with this part. That archive shall be kept accessible for a period of time that shall be no less than the storage period set by national law for information included in the institutions' financial reports.	0 months after date of application
P3 Data Hub	Other	CRR	434(5)	The EBA shall monitor the number of visits to its single access point on institutions' disclosures and include the related statistics in its annual reports.	0 months after date of application
Reporting	Guidelines	CRD	106(1)	Guidelines on specific publication requirements	12 months after entry into force
Reporting	ITS	CRR	430(7)(1)Part 2	(Part2) ITS on supervisory reporting – not Basel III relevant	12 months after entry into force
P3 Data Hub	ITS	CRR	434a(1)Part1	(Part 1) ITS on disclosure requirements / IT solutions	12 months after entry into force
P3 Data Hub	ITS	CRR	434a(1)Part2	(Part2) ITS on disclosure requirements / resubmission policy	12 months after entry into force
Disclosure	ITS	CRR	434a(1)Part3	(Part3) ITS on disclosure requirements / disclosure formats and instructions – Basel III relevant	12 months after entry into force
Disclosure	ITS	CRR	434a(1)Part4	(Part4) ITS on disclosure requirements / disclosure formats and instructions – not Basel III relevant	12 months after entry into force
Disclosure	ITS	CRR	449a(3)	ITS specifying uniform disclosure formats for ESG risks	12 months after entry into force
				Phase 3	
Reporting	Report	CRR	434(c)(1)	Report on the feasibility of using qualitative and quantitative information	36 months after entry into force

Market access and third-country branches

Area	Product	Reg.	Article	Deliverable	Legal deadline
				Phase 1	
Market access	Report	CRD	21c(6)	Report on whether any financial sector entity in addition to credit institutions should be exempted from the requirement to establish a branch for the provision of banking services by third-country undertakings	12 months after entry into force
				Phase 2	
Market access	ITS	CRD	21b(6)	Templates for IPU monitoring threshold	18 months after entry into force
Market access	RTS	CRD	23(6)	RTS on minimum information to be provided for assessing QHs	18 months after entry into force
Market access	RTS	CRD	48i(4)	RTS booking arrangements TCBs	18 months after entry into force
Market access	ITS	CRD	48m(1)	ITS on minimum common reporting of TCBs	18 months after entry into force
Market access	RTS	CRD	48q(7)	RTS on mechanisms of cooperation and functioning of supervisory colleges for third-country branches	18 months after entry into force
Market access	RTS	CRD	8a(6a)	RTS on waiver for authorisation of trading venues	18 months after entry into force
Market access	Guidelines	CRD	4(4a)	Guidelines on the definition of ancillary service undertaking	18 months after entry into force
Market access	RTS	CRD	27b(7)	New supervisory powers: list of information to be submitted by proposed acquirer, assessment criteria and process for the assessment of acquisition of material holdings and mergers	24 months after entry into force

Area	Product	Reg.	Article	Deliverable	Legal deadline
Market access	ITS	CRD	27c(3)	ITS on cooperation between CAs for acquisition of material holdings	24 months after entry into force
Market access	Guidelines	CRD	48c(5a)	Guidelines on authorisation of TCBs	24 months after entry into force
Market access	Guidelines	CRD	48e(4)	Guidelines on instruments for minimum endowment of third-country branches	24 months after entry into force
Market access	Guidelines	CRD	48o(6)(1)(a)	Guidelines on SREP for third-country branches	24 months after entry into force
Market access	Guidelines	CRD	48o(6)(1)(b)	Guidelines on mechanisms for cooperation and information exchange between competent authorities, FIUs and AML/CFT supervisors for third-country branches	24 months after entry into force
				Phase 3	
Market access	ITS	CRD	27m(4)	ITS to establish common procedures, forms and templates for the consultation process between the competent authorities in the case of mergers	30 months after entry into force
Market access	Guidelines	CRD	48h(9)	Guidelines on internal governance of third-country branches	30 months after entry into force
				Phase 4	
Market access	Report	CRD	48c(3)	EBA report on monitoring operations between the third-country branches of the same head undertaking	48 months after entry into force
Market access	Report	CRD	48k(5)	EBA report on use of subsidiarisation power and assessment	54 months after entry into force
Market access	Report	CRD	8a(6b)	Report on the use of the waiver as envisaged in accordance with paragraph 3a as well as on the use of the power under point 1(b)(iii) of Article 4(1) of Regulation (EU) No 575/2013	54 months after entry into force
Market access	Other	CRD	48r(1)	List of all third-country branches authorised to operate in the Union	No deadline

Governance

Area	Product	Reg.	Article	Deliverable	Legal deadline
				Phase 2	
Governance	Guidelines	CRD	91(10)	Update of joint EBA ESMA GLs on the assessment of the suitability of members of the MB taking into account the changes introduced re assessment of the MB and KFHs both by institutions and CAs (91(10) and 91a(4))	24 months after entry into force
Governance	RTS	CRD	91(10a)	RTS on information and documentation to be submitted to the competent authorities to carry out the suitability assessments of members of the management body and of heads of internal control functions and the chief financial officer under Directive 2013/36/EU	24 months after entry into force
Governance	Guidelines	CRD	91(1ca)	Guidelines to define how the enhanced dialogue to address suitability concerns shall be carried out	24 months after entry into force
				Phase 4	
Governance	Report	CRD	91(10b)	In close cooperation with the ECB, review and report on the application of paragraphs 1ca to 1h and on their efficiency in ensuring that the fit and proper framework is fit for purpose taking into account the principle of proportionality	66 months after entry into force
Governance	Guidelines	CRD	74	Update of guidelines on internal governance to include ESG risks, the independence of internal control functions from operational functions and the overall responsibility of the MB as a collegial body, and to strengthen the accountability of members of the MB	No deadline

Area	Product	Reg.	Article	Deliverable	Legal deadline
				Changes to Articles 74 and 76 CRD and changes to Article 88 CRD	
Governance	Guidelines	CRD	75	Update of guidelines on sound remuneration policies to reflect the ESG risks as set out in Article 76(2) unless this is covered by the update to the GLs on internal governance	No deadline
				Ongoing	
Governance	Report	CRD	94(1)(g)(ii)	Benchmarking of the practices of institutions regarding approved higher maximum ratio	Ongoing

ESG

Area	Product	Reg.	Article	Deliverable	Legal deadline
				Phase 1	
ESG	Report	CRR	501c(e)	Report on analysis and recommendations on enhancements to the prudential framework	0 months after entry into force
ESG	Report	CRR	501c(a,b)	Report on availability of data and feasibility of introducing a standardised methodology	6 months after entry into force
				Phase 2	
ESG	Guidelines	CRD	87a(5)	Guidelines on minimum standards and reference methodologies for the identification, measurement, management and monitoring of environmental, social and governance risks (including stress testing)	18 months after entry into force
ESG	Report	CRR	501c(c,d)	Report on effective riskiness, additional modifications to the framework and effects on financial stability and bank lending	18 months after entry into force

Others

Area	Product	Reg.	Article	Deliverable	Legal deadline
				Phase 1	
Ongoing supervision	Guidelines	CRD	104a(6a)	Guidelines on output floor and impact on the SREP	9 months after entry into force
Accounting	Report	CRR	18(10)	Report on the completeness and appropriateness of the relevant CRR definitions and provisions on consolidation	12 months after entry into force
				Phase 2	
Stress test	Guidelines	CRD	100(4)	Joint guidelines on methodologies for the stress testing of environmental, social and governance risks	18 months after entry into force
Legal	Guidelines	CRD	4(4)	Guidelines on the prevention of conflicts of interest in and independence of competent authorities	24 months after entry into force
Institutional affairs	Report	CRR	461a(4)	Report on the implementation of international standards on own funds requirements for market risk in third countries	24 months after entry into force
				Phase 3	
Large exposures	Guidelines	CRR	395(2a)(sub 1)	Guidelines on the application of aggregate limits or tighter individual limits to exposures to shadow banking entities	30 months after entry into force
Securitisation	Report	CRR	506ca	Report on the prudential treatment of securitisation transactions including the application of the output floor	30 months after entry into force
				Phase 4	
Large exposures	Report	CRR	395(2a)(sub 2)	Report on the contribution of non-banking financial intermediation to the Capital Markets Union, on institutions' exposures to shadow	42 months after entry into force

Area	Product	Reg.	Article	Deliverable	Legal deadline
				banking entities, including on the appropriateness of aggregate limits or tighter individual limits to those exposures, while taking into due account the regulatory framework and business models of shadow banking entities	
Proportionality	Report	CRR	519da	Report on proportionality	54 months after entry into force
Legal	Report	CRD	70(5)	Report on the cooperation between competent authorities and judicial authorities on the application of administrative penalties	60 months after entry into force
Institutional affairs	Other	CRD	48b(3)	Public register of the third countries and third-country authorities in relation to third-country branches	No deadline
Benchmarking	Guidelines	CRD	78(6)	Guidelines on approaches within the scope of the supervisory benchmarking	No deadline
Macroprudential	Other	CRR	458(9)	In consultation with the EBA, a decision by MSs for the extension of the period of application of national measures	No deadline
				Ongoing	
Benchmarking	Report	CRD	78(3)	Report on the benchmarking of own funds approaches	Ongoing

ANNEX XV: PEER REVIEWWORK PLAN 2024-2025

The EBA publishes a peer review work plan for the coming two years. In case of urgency or unforeseen events, the EBA may decide to carry out additional peer reviews.

Peer reviews to be launched in 2024

Q1 – Dividend arbitrage trading schemes (Cum-Ex/Cum-Cum)

A peer review into the actions taken by financial institutions to comply, and prudential/AML supervisors to assess compliance, with requirements applicable to dividend arbitrage trading schemes. This will look at actions taken to implement the measures adopted by the EBA under its 10-point Cum-Ex/Cum-Cum action plan.[35] The sample of competent authorities would take into account the Member States most affected by the topic, as well as both the prudential and AML dimensions.

Q2 (now planned for Q4)– Diversity and gender pay gap

Following on from publication of the EBA's 2023 diversity report, this peer review will assess how CAs monitor and encourage the application of gender and diversity policies as indicated in Articles 74, 88, 91, 94 of the CRD. It will take into account the EBA Internal Governance Guidelines and Guidelines on Remuneration Polices and the policies and processes in place to supervise these.

Q3 (now planned for Q2) - Resilience of deposit guarantee schemes (DGS)

Article 4(10) of the Deposit Guarantee Scheme Directive requires the EBA, at least every five years, to conduct a peer review to examine the resilience of deposit guarantee schemes. The results of the last peer review were published in June 2020 and it is expected that the next round of stress tests required to be carried out by DGS will take place in 2024. The peer review will also take into account cooperation between DGS and with relevant domestic authorities in this context.

Follow-up peer reviews to be launched in 2024

- Supervision of non-performing exposures management (follow-up to EBA/Rep/2022/12)
- Peer review report on ICT risk assessment under the SREP (follow-up to EBA/Rep/2022/25)
- Authorisation under PSD2 (follow-up to EBA/Rep/2023/01)

Potential peer reviews for 2025

The EBA plans to launch three peer reviews in 2025, with the following identified as potential topics:

- Supervision of Pillar 3 disclosures
- Supervision of Interest rate risk in the banking book

[35] https://www.eba.europa.eu/sites/default/documents/files/document_library/News%20and%20Press/Press%20Room/Press%20Releases/2020/EBA%20publishes%20its%20inquiry%20into%20dividend%20arbitrage%20trading%20schemes%20%28%E2%80%9CCum-Ex/Cum-Cum%E2%80%9D%29/883617/Action%20plan%20on%20dividend%20arbitrage%20trading%20schemes%20Cum-ExCum-Cum.pdf.

- Supervision of liquidity under SREP
- Assessment of resolvability
- ESG in risk management

Follow-up peer reviews to be launched in 2025

- Supervision of credit valuation adjustment (CVA) risk (follow-up to EBA/Rep/2023/15)
- Supervision of treatment of mortgage borrowers in arrears

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