DORA 2024 Dry run data collection of registers of information: Materials and tools

Workshop for financial entities
10 June 2024

Agenda

1.	10:00-10:05	Opening and housekeeping	ESA Staff
2.	10:05-11:00	Presentation of dry run tools • General overview of the dry run exercise • Templates and examples • Preparing .csv and .zip files for reporting • Using .xls to .csv conversion tool	ESA Staff
3.	11:00-12:00	Question and answers session	ESA

Please note that the meeting will be recorded on the basis of Article 29(1)e of Regulation (EU) 1094/2020. The recording will be published afterwards on the websites of EBA, EIOPA and ESMA for the purpose of facilitating the implementation of DORA.

If you do not wish to be recorded, please mute your audio / disable your camera, and inform the organiser by chat message before you take the floor, so that the recording is paused during your intervention. Alternatively, you have the option to send your question via Slido to the presenter who will then read it out loud for you without mentioning your name.

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European Insurance and
Occupational Pensions Authority

ESMA
European Securities and Markets Authority

Housekeeping: How to interact with us today – Slido

1. **Go to slido.com, enter event code #DORA and your full name and organisation (e.g. *"Mario Rossi (EIOPA)"*)**

   ▪ The name and organisation used for Slido and WebEx must be identical.

2. **Submit written comments/questions through Slido and upvote questions of interest submitted by other participants.**

3. **If your question is very popular, we will read it during the meeting and may ask you to raise your hand via WebEx and orally explain it.**

   ▪ The moderator will not accept inputs which are:

      ▪ Submitted by people with uncompleted names

      ▪ Offensive

   ▪ Inputs related to areas of DORA not covered during this event, will be given a lower priority compared to those in scope

   ▪ We will try to archive all inputs before each session
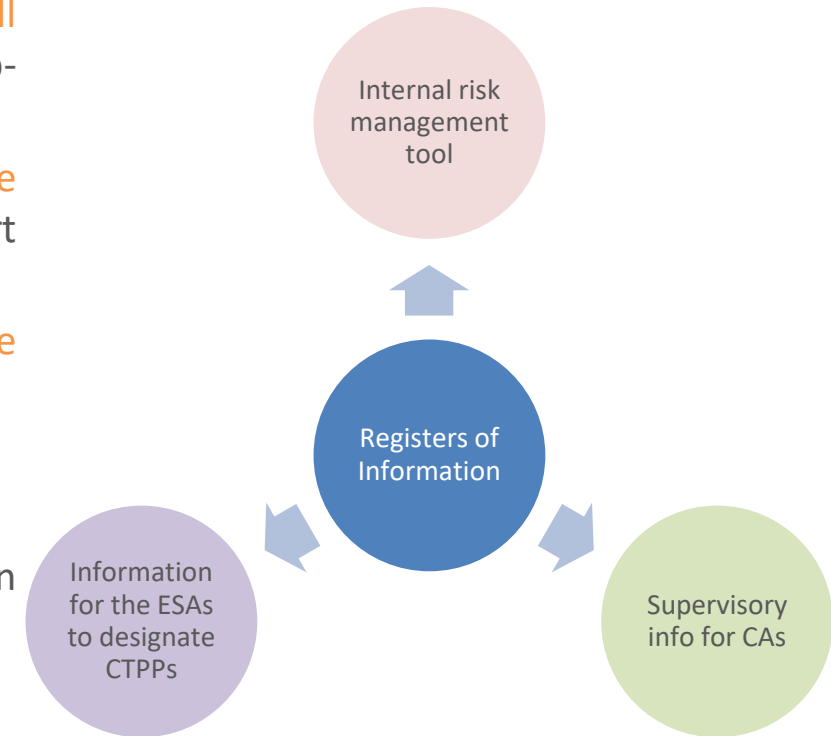
General overview of the dry run exercise

Background: Registers of information and its reporting

- DORA will become applicable on 17 January 2025

- DORA requires all financial entities (FE) in its scope to have a register of information of all their contractual arrangements with ICT third-party providers available at entity, sub-consolidated and consolidated levels (Article 28(3) of DORA)

- The content of the registers of information is specified in a draft ITS developed by the ESAs which is in the process of being adopted by the European Commission (Final Report available here)

- FE will need to keep the registers up-to-date and be ready to report them to the competent authorities (CA) starting from early 2025

Reporting of the registers

- CA will provide the registers on annual basis to the ESAs for the purposes of designation of critical ICT third-party service provides (CTPP)

- Reporting to be supported by the data point model, taxonomy and validation rules

- Simplified reporting format – plain-csv

Internal risk management tool

Registers of Information

Information for the ESAs to designate CTPPs

Supervisory info for CAs

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Objectives of the dry run exercise

To help with the preparations for establishing and reporting registers of information by the financial entities and competent authorities

- Participating FEs are expected to submit complete Registers of Information in accordance with the Final Report on the Draft ITS on RoI on best-efforts basis (partial registers, sample of contracts etc. is acceptable)
- Participating FEs will receive feedback through their competent authority on the data quality issues
- The ESAs will also publish a report with high-level observations about data quality and will also organise a workshop to share their general findings and observations with the industry

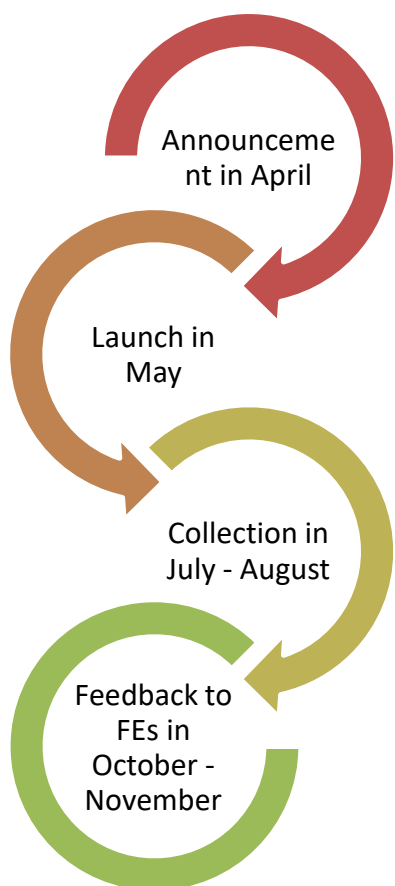| To take stock of the preparedness of the market and increase awareness | → | Help to prepare reporting files | → | Identify and address data quality concerns | → | Help to prepare for steady-state reporting (onboarding of CAs) |

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Timeline and milestones

- **Announcement in April**
- **Launch in May**
- **Collection in July - August**
- **Feedback to FEs in October - November**

- **30 April –** introductory workshop for the industry

- **31 May** – launch for the industry: materials, specifications and tools made available to the participating FEs, and list of involved FEs confirmed by the CAs

- **June-July** – ESAs' workshops with participating FEs and CAs, FAQ support

- **1 July-30 August** – registers of information collected (no resubmissions envisaged) from participating FEs through their competent authorities (which may set specific deadlines within this window)

- **31 October** – end of the data cleaning and quality checks. Feedback provided to the participating FEs via their competent authorities

- **November** – ESAs' 'lessons learnt' workshop on data quality open to the entire industry

- **Early December –** publication of aggregated data quality report

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Materials and tools to support the dry run exercise

Tools and materials published on 31 May:

- Templates for the register of information (.xls for filling)
- Two examples of filled-in templates
- Draft DPM annotated table layout
- Draft taxonomy
- DORA plain csv sample reporting package
- XLS to CSV conversion tool (VBA macro) plus instructions
- FAQ
  - Part dealing with the questions regarding the exercise published
  - Separate process for dealing with questions regarding filling the templates

Important disclaimer: materials and tools published are meant solely for the purposes of the dry run exercise as they are (1) based on the Final report on the Draft ITS on registers of information published and submitted in January 2024 by the ESAs to the EU Commission for adoption and, therefore, do not reflect the final legal act adopted by the EU Commission, (2) presented in a draft form (DPM and validation rules). The final technical package for the steady-state reporting, which will start in 2025, will be published later in the year.
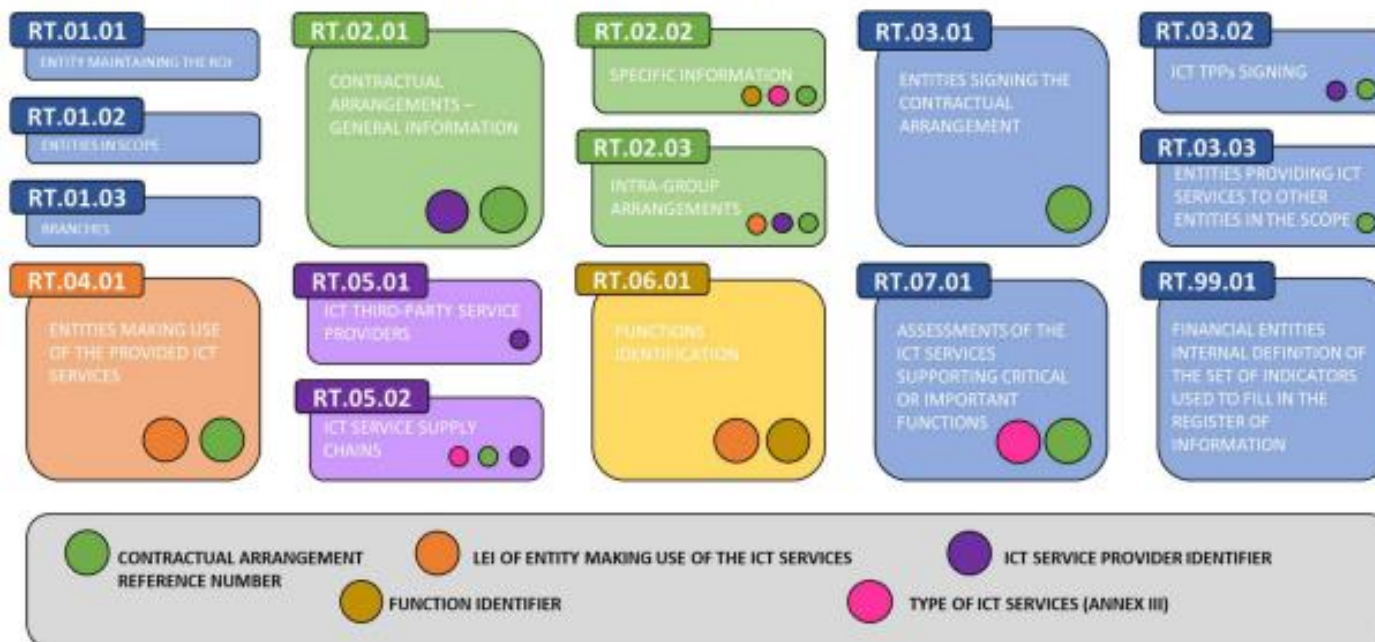
Templates and examples

2. Templates and examples

Template based on the Final report on the Draft ITS on registers of information published and submitted in January 2024 by the ESAs to the EU Commission

Illustration 1: Structure of the Register of Information

Each box represents one template of the Register of information.

Excel based template

An Excel Master template is made available to facilitate the reporting according to the draft DPM

- Based on ITS RoI
- Drop downs available for closed options based on members of the draft DPM (further info on tab 'Drop down')
- Cells formatted
- Protected and locked

2. Templates and examples

TEMPLATE RT.01.01: Entity maintaining the register of information

TEMPLATE RT.01.02: List of entities within the scope of the register of information

b_01.02.0010	b_01.02.0020	b_01.02.0030	b_01.02.0040	b_01.02.0050	b_01.02.0060	b_01.02.0070	b_01.02.0080	b_01.02.0090	b_01.02.0100	b_01.02.01
LEI of the entity	Name of the entity	Country of the entity	Type of entity	Hierarchy of the entity within the group (	LEI of the direct parent undertaking entity	Date of last update	Date of integration in the Register of information	Date of deletion in the Register of information	Currency	Value of tot assets - of t financial en

TEMPLATE RT.01.03: List of branches

	b_01.03.00	TEMPLATE RT.02.01: Contractual arrangements – General Info						Currency	Monetary
Alphanun	Identificati							eba_CU:EUR	1000000
LEI0000000		b_02.01.0010	b_02.01.0020	b_02.01.003	40	b_02.01.0050		eba_CU:EUR	100000000
LEI0000000	Alphanume	Contractual arrangement reference	Type of contractual	Overarching		Annual expense or estimated cost		eba_CU:EUR	50000000
	LEI0000000	reference							

TEMPLATE RT.02.02: Contractual arrangements – Specific informa

	b_02.02.0010	b_02.02.0020	b_02.02.0030		b_02.02.0050	b_02.02.0060	b_02.02.0070	b_02.02.0080	b_02.02.0090
Alphanu	Contractual arrangement reference number	LEI of the entity making use of the	Identification co the ICT third-par	y	Function identifier	Type of ICT services	Start date of the contractual	End date of the contractual	Reason of the termination ending of the contractual
C4									
C2	Alphanume								
C3	C4	**TEMPLATE RT.02.03: List of intra-group co**							
C1	C2								b_02.03.003
	C3	b_02.03.0010							Link
	C1	Contractual arrangement reference numb		ement linked to the contractual arrangement referred in RT.02.03.0010					
	C1	Alphanumerical							Fill with "tru
	C1	C1							true
		C2							true
		C3							true
		C4							

LISTCOUNTRY	DESCCOUNTRY	LISTCURREN
eba_GA:AL	ALBANIA	eba_CU:AED
eba_GA:AT	AUSTRIA	eba_CU:AFN
eba_GA:BE	BELGIUM	eba_CU:ALL
eba_GA:BG	BULGARIA	eba_CU:AM
eba_GA:CY	CYPRUS	eba_CU:AN
eba_GA:CZ	CZECH REPUBLIC	eba_CU:AO
eba_GA:DK	DENMARK	eba_CU:ARS
eba_GA:EE	ESTONIA	eba_CU:AU
eba_GA:FI	FINLAND	eba_CU:AW
eba_GA:FR	FRANCE	eba_CU:AZN
eba_GA:DE	GERMANY	eba_CU:BAI
eba_GA:GR	GREECE	eba_CU:BBI
eba_GA:HU	HUNGARY	eba_CU:BD'
eba_GA:IE	IRELAND	eba_CU:BG
eba_GA:IT	ITALY	eba_CU:BHI
eba_GA:JP	JAPAN	eba_CU:BIF
eba_GA:XK	KOSOVO	eba_CU:BM
eba_GA:LV	LATVIA	eba_CU:BNI
eba_GA:LT	LITHUANIA	eba_CU:BO'
eba_GA:LU	LUXEMBOURG	eba_CU:BO'
eba_GA:MK	NORTH MACEDONIA	eba_CU:BRL
eba_GA:MT	MALTA	eba_CU:BSI
eba_GA:NL	NETHERLANDS	eba_CU:BTN
eba_GA:NO	NORWAY	eba_CU:BW
eba_GA:PL	POLAND	eba_CU:BYF
eba_GA:PT	PORTUGAL	eba_CU:BYI
eba_GA:RO	ROMANIA	eba_CU:BZ[
eba_GA:RU	RUSSIAN FEDERATION	eba_CU:CAI
eba_GA:RS	SERBIA	eba_CU:CD[
eba_GA:SK	SLOVAKIA	eba_CU:CHI
eba_GA:SI	SLOVENIA	eba_CU:CHI
eba_GA:ES	SPAIN	eba_CU:CH'
eba_GA:SE	SWEDEN	eba_CU:CLF
eba_GA:CH	SWITZERLAND	eba_CU:CLF

> ≡ 🔲 Instructions   🔒 Drop down
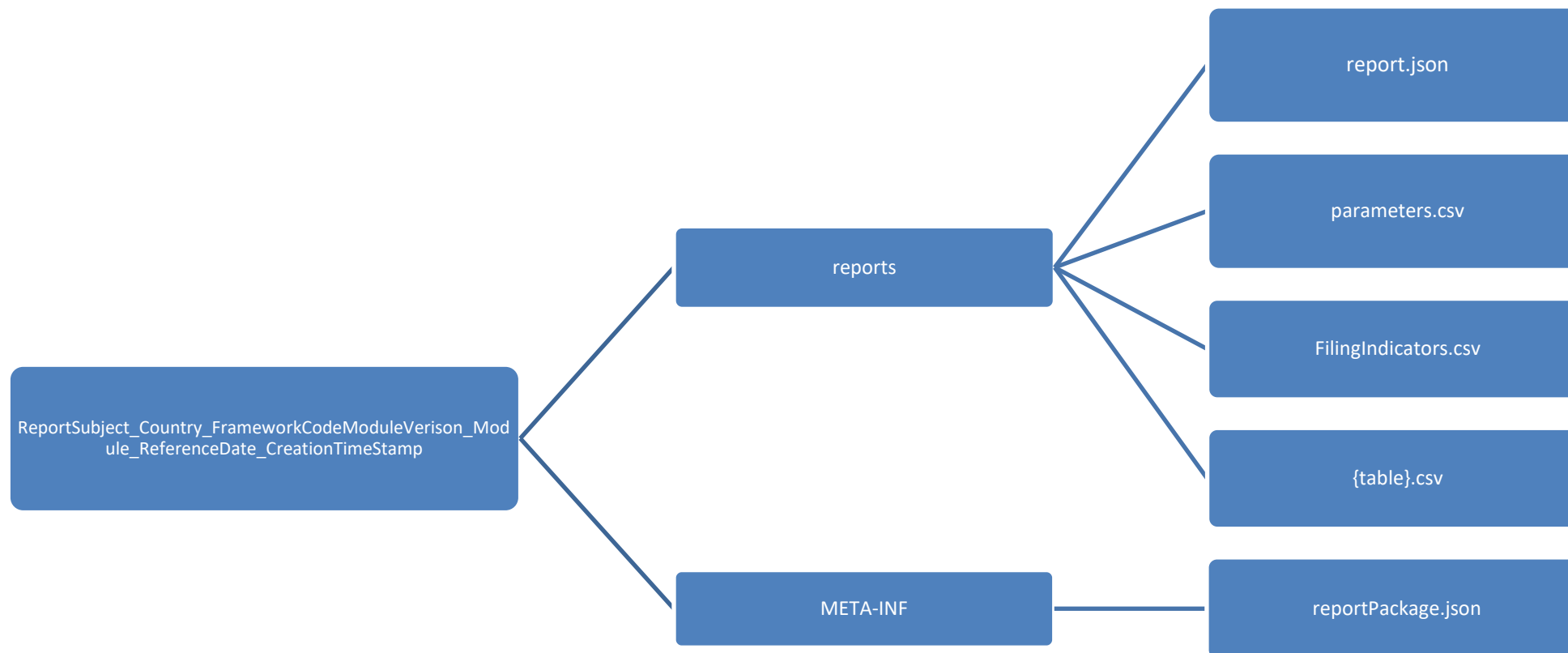
2. Templates and examples

TEMPLATE RT.03.01: Entities signing the Contractual arrangements for receiving ICT service(s) or on behalf of the entities making use of the ICT service(s)

TEMPLATE RT.03.02: ICT third-party service providers signing the Contractual arrangements for providing ICT service(s)

TEMPLATE RT.03.03: Entities signing the Contractual arrangements for providing ICT service(s) to other entity within the scope of consolidation.

TEMPLATE RT.04.01: Entities making use of the ICT services

b_03.03.0031

" for ea

TEMPLATE RT.05.01: ICT third-party service providers

TEMPLATE RT.05.02: ICT service supply chains

b_05.02.0010	b_05.02.0020	b_05.02.0030	b_05.02.0040	b_05.02.0050	b_05.02.0060	b_05.02.0070
Contractual arrangement	Type of ICT services	Identification code of the ICT	Type of code to	Rank	Identification code of the	Type of code to ident

TEMPLATE RT.06.01: Functions identification

b_06.01.0010	b_06.01.0020	b_06.01.0030	b_06.01.0040	b_06.01.0050	b_06.01.0060
Function Identifier	Licenced activity	Function name	LEI of the financial	Criticality or importance	Reasons for criticality or

TEMPLATE RT.07.01: Assessment of the ICT services

b_07.01.0010	b_07.01.0020	b_07.01.0030	b_07.01.0040	b_07.01.0050	b_07.01.0060
Contractual arrangement reference number	Identification code of the ICT third-party service provider	Type of code to identify the ICT third-party service provider	Type of ICT services	Substitutability of the ICT third-party service provider	Reason if the IC provider is con or difficult to b
Alphanumerical	Alphanumerical	Pattern	Closed set of options	Closed set of options	Closed set of o
C4	LEI00000000000000000C	LEI	eba_TA:S06	eba_ZZ:x960	eba_ZZ:x964

Preparing .csv and .zip files for reporting

Plain-csv reporting package structure

- **ReportSubject.CON/IND_Country_FrameworkCodeModuleVersion_Module_ReferenceDate_CreationTimestamp.zip**
  - ➢ DUMMYLEI123456789012.CON_IT_DORA010100_DORA_2023-12-31_20240821141632000.zip
  - ➢ DUMMYLEI123456789012.IND_IT_DORA010100_DORA_2023-12-31_20240821141632000.zip

ReportSubject_Country_FrameworkCodeModuleVerison_Module_ReferenceDate_CreationTimeStamp

reports
- report.json
- parameters.csv
- FilingIndicators.csv
- {table}.csv

META-INF
- reportPackage.json

DORA reporting package content

- Each reporting package for one module, one reference date, one reporting subject :

| 1. report.json | 2. parameters.csv | 3. FilingIndicator.csv | 4. {table}.csv |

1. report.json

```
{"documentInfo":  {....
"extends":
[        "http://www.eba.europa.eu
/eu/fr/xbrl/crr/fws/dora/jc-2023-
86/2024-07-11/mod/dora.json"]
}}
```

2. parameters.csv

name	value
entityID	rs:LEIxxxxxxxx.IND
refPeriod	31/12/2023
baseCurrency	iso4217:EUR
decimalsInteger	0
decimalsMonetary	-3

3. FilingIndicator.csv

templateID	reported
B_01.01	true
B_01.02	true
B_01.03	true
B_02.01	true
B_02.02	true

* templateID start by "B_xx.xx" in accordance with the draft DPM and not "RT_xx.xx" (contrary to the Final Report), but are the same

4. {table}.csv

Explained on next slide

Reporting Data structure in {table}.csv: from template to plain csv

table: b_01.01

		Columns			
LEI of the entity maintaining the register of information	Name of the entity	Country of the entity	Type of entity	Competent Authority	Date of the reporting
Alphanumerical	Alphanumerical	Country	Closed set of options	Alphanumerical	Date
0010	0020	0030	0040	0050	0060
XXXXX00XX0X0XXXXXX00	Financial entity ABC	eba_GA:AT	eba_CT:x12	ACPR	2023-12-31

b_01.01.csv

```
c0010,c0020,c0030,c0040,c0050,c0060
XXXXX00XX0X0XXXXXX00,Financial entity ABC,eba_GA:AT,eba_CT:x12,ACPR,2023-12-31
```

Reporting Data structure in {table}.csv: from template to plain-csv

table: b_01.02

Columns										
LEI of the entity	Name of the entity	Country of the entity	Type of entity	Hierarchy of the entity within the group (where applicable)	LEI of the direct parent undertaking of the entity	Date of last update	Date of integration in the Register of information	Date of deletion in the Register of information	Currency	Value of total assets - of the financial entity
Alphanumerical	Alphanumerical	Country	Closed set of c	Closed set of opti	Alphanumerical	Date	Date	Date	Currency	Monetary
0010	0020	0030	0040	0050	0060	0070	0080	0090	0100	0110
XXXXX00XX0X0XXXXX00	Financial entity ABC	eba_GA:FR	eba_CT:x12	eba_RP:x53	XXXXX00XX0X0XXXXX00	2024-01-01	2024-05-23		eba_CU:EUR	2000000000000
XXXXX00XX0X0XXXXX01	Financial entity ABCa	eba_GA:FR	eba_CT:x12	eba_RP:x56	XXXXX00XX0X0XXXXX00	2024-01-01	2024-05-23		eba_CU:EUR	5000000000
XXXXX00XX0X0XXXXX02	Financial entity ABCb	eba_GA:DE	eba_CT:x12	eba_RP:x56	XXXXX00XX0X0XXXXX00	2024-01-01	2024-05-23		eba_CU:EUR	3000000000
XXXXX00XX0X0XXXXX03	Financial entity ABCc	eba_GA:BE	eba_CT:x599	eba_RP:x56	XXXXX00XX0X0XXXXX00	2024-01-01	2024-05-23	2022-12-31	eba_CU:EUR	1000000000

b_01.02.csv

```
c0010,c0020,c0030,c0040,c0050,c0060,c0070,c0080,c0090,c0100,c0110
XXXXX00XX0X0XXXXX00,Financial entity ABC,eba_GA:FR,eba_CT:x12,eba_RP:x53,XXXXX00XX0X0XXXXX00,2024-01-01,2024-05-23,,eba_CU:EUR,2000000000000
XXXXX00XX0X0XXXXX01,Financial entity ABCa,eba_GA:FR,eba_CT:x12,eba_RP:x56,XXXXX00XX0X0XXXXX00,2024-01-01,2024-05-23,,eba_CU:EUR,5000000000
XXXXX00XX0X0XXXXX02,Financial entity ABCb,eba_GA:DE,eba_CT:x12,eba_RP:x56,XXXXX00XX0X0XXXXX00,2024-01-01,2024-05-23,,eba_CU:EUR,3000000000
XXXXX00XX0X0XXXXX03,Financial entity ABCc,eba_GA:BE,eba_CT:x599,eba_RP:x56,XXXXX00XX0X0XXXXX00,2024-01-01,2024-05-23,2022-12-31,eba_CU:EUR,1000000000
```

Date type consistencies for columns

1. String type (alphanumerical): string value, and if the string value contains separator ",", then the string value must be quoted with double quotes "".

2. Date type: must in format yyyy-mm-dd

3. Enumerated type (close set of options): must be a value from the dropdown list (and prefixed with owner eba_, ex:eba_GA:AT)

4. Boolean type: must be either true or false, 1 or 0

5. Monetary type: must be expressed in units, not in thousands or millions (ex: 2540100.23)

6. Integer type: must be an integer

7. If the column is a key, then it must be filled

Using .xls to .csv conversion tool

.xls to .csv conversion tool

Tool in Excel VBA

Instructions document

+

XLS to CSV conversion tool is provided solely for the purposes of the dry run exercise and will not be maintained for formal reporting starting from 2025

Video demonstration of the .xls to .csv conversion tool

Questions and answers

Reference materials and contacts

- Dry run exercise dedicated [webpage](#) (contains all materials, recordings of the workshops)

- Final Report on Draft ITS on register of Information [here](#) (includes also illustrative Excel template)

- Email address for questions ESA-DORA-Reporting@eba.europa.eu

Question and answers

Thank you for your attention!

Questions?