European Banking Authority

SINGLE PROGRAMMING DOCUMENT

YEARS 2026-2028

EBA/REP/2025/03

FOREWORD

This draft single programming document (SPD) sets out the EBA's planning of activities and corresponding resource requirements for years 2026-2028. It considers existing and foreseeable mandates conferred by the legislators, and the risk outlook for the financial sector. It retains sufficient flexibility to redeploy resources and adjust to unforeseen developments and requests.

In 2026, the EBA will start a new cycle after several years of negotiations and preparations of new legislations and responses to shocks. Firstly, it will concentrate on the implementation of new rules. It will finalise its work on the banking package (CRD/CRR) and carry out new oversight and supervisory responsibilities in the areas of critical third-party service providers and cyber incidents (DORA), significant issuers of certain crypto assets (MICAR), and initial margin model validation (EMIR). It will be supporting AMLA's start.

Secondly, the EBA will tackle new challenges arising from the financial risks and vulnerabilities outlook. This is due to the changing geopolitical context and rising economic imbalances, as well as to the transformations at play in the financial sector, with environmental and digital transitions. This will require new approaches for assessing risks, preserving financial stability and protecting consumers.

Last but not least, the EBA will support the new European Commission. The co-legislators' initial priorities for the financial sector are already reflected in this SPD: creating a European Savings and Investment Union for market and banking; unlocking bank financing including through securitisation; working on non-bank financial intermediation and digital finance and payments; making a success of the green and digital transitions, reducing administrative and reporting burden. The SPD will be refined in the course of 2025 when more details become available on the implementation of priorities for the new legislative cycle.

Against that background, the EBA will refocus its work on three multi-annual priorities: 1) evolving its rulebook, so that it contributes to an efficient, resilient and sustainable single market; 2) carrying out risk assessments, to adequately support effective analysis, supervision and oversight; 3) tackling and embracing innovation, to enhance the technological capacity of all stakeholders.

With the support of its members, a guiding principle for the EBA is to achieve its missions in a way that best combine stability and efficiency objectives for the financial sector. This will require intensifying the cooperation with relevant EU and third-country authorities, especially when dealing with cross-sector topics like digital, sustainability, financial reporting or non-bank financial intermediation.

EBA's work will continue to benefit from its investments to build a modern, flexible and resilient organisation, reaping a high level of synergies (the number of activities has been streamlined from 37 to 19 since 2021), and rolling out an HR strategy that nurtures staff motivation and satisfaction (72% in the 2024 survey). In recent years, it could thus deliver its annual work programmes, including substantial new requests, without having received new resources. In 2026-2028, selected (partly temporary) reinforcements will be needed to fill some critical gaps. EU and members' contributions should only very moderately increase (between 1 to 2% in nominal terms annually) and start to decrease after 2028.

François-Louis Michaud
EBA Executive Director

LIST OF ABBREVIATIONS

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

MISSION, TASKS, VALUES

Mission and vision

The EBA contributes 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.

Role and tasks

The EBA is an independent EU agency accountable to the European Parliament, the European Council of the EU and the European Commission. Its role is to improve the functioning of the EU's internal market through appropriate, efficient, and harmonised regulation and supervision, thus contributing to an efficient and stable functioning of the banking and financial system.

The EBA is part of the European System of Financial Supervision together with ESMA and EIOPA, and collaborate closely with the ESRB and relevant competent authorities in the EU and third-countries.

Whilst European and national competent authorities supervise individual financial institutions, the EBA develops a single rulebook for the financial entities in its remit and the authorities which supervise them, through technical standards and guidelines. It promotes a convergent application of these rules, investigating the application of EU law by competent authorities, mediating disagreements between them and taking decisions in emergency situations. Harmonised rules foster a level playing field for financial entities and provide high protection to depositors, investors, and consumers.

The EBA assesses risk and vulnerabilities in the EU banking and financial sector through regular risk assessments in a wide range of areas, including through regular EU-wide stress tests of the banking sector. Finally, it exerts some direct oversight, coordination and supervisory responsibilities.

Values

Public service at the core: The EBA acts independently, in the sole interest of the European Union. It is committed to strengthening the financial sector and protecting consumers through sound regulation.

Excellence in everything the EBA does: It promotes simplicity, objectivity, transparency and proportionality. It learns from successes and failures and continues improving what it does.

Trust in relationships: The EBA builds relationships based on trust, respect and transparency. It is open and responsible for its actions, promises and commitments. It cares about people. It should resemble the European society. And it will abide by high ethical and environmental principles.

Creativity to deal with challenges: The EBA strives to innovate and make a difference, with the belief that change is possible. It pioneers new ways of working to make a difference, and that makes it unique. It has the energy, imagination and courage to lead.

Collaboration is EBA's approach: It values team spirit and cultural diversity. It encourages, seeks and values input and feedback. By having a collaborative mindset, it can work and grow together with all stakeholders.

SECTION I – GENERAL CONTEXT

1. The EBA's multi-annual work programme takes into account the missions stemming from its founding regulation as well as from agreed or prepared EU legislations and the outlook for the financial sector. It is aligned with the Union's priorities and strategies for the financial sector. While a large part of the mandates have legal deadlines, the authority retains flexibility to adjust its work programme throughout the year if circumstances warrant it. Presented in the format applying to EU decentralised agencies, it is endorsed by the EBA's Board of Supervisors upon a proposal from its Management Board.

2. Five external developments impacting EBA's work were considered at the time of planning:

1) EC priorities

New priorities

Initial priorities of the new EC for the financial sector with direct relevance for the EBA were highlighted in the mission letter to the Commissioner for Financial Services and the Savings and Investments Union:

- Develop a European Savings and Investment Union for market and banking to support the financing of wider EU objectives. Complement Banking Union, with a European Deposit Insurance Scheme.
- Unlock bank financing including through reviving securitisation with due attention given to financial stability.
- Work on macro-prudential aspects of non-bank financial institutions.
- Continue work on improving digital finance and payments, as well as consumer protection and financial literacy, in the continuation of the 'Europe fit for the digital age' priority and the ensuing 'Digital Finance Package', and implementing the Open Finance framework (FIDA), monitoring new risks and opportunities, and a specific call to assess AI in the financial sector.
- Ensure implementation and enforcement of AML/CFT.

Other tasks in this letter are also expected to impact EBA's work:

- Help design simple and low-cost saving and investment products at EU level (with consideration of possible tax incentives), and work on the potential of private and occupational pensions.
- Review the regulatory framework to ensure growth of EU companies and start-ups, and work on risk-absorbing measures to crowd in private funding from commercial banks, investors and venture capital.
- Scale up sustainable finance in particular transition finance and climate resilience, promoting the development and transparent categorisation of sustainable financial products and services, and implementing a framework, which is easy to comply with and report on.
- Increase the availability of venture and other risk capital, promote scaling up of investment funds, remove barriers to market infrastructure consolidation.

Finally, the mission letter to the Commissioner for Economy and Productivity raises tasks on Implementation and Simplification with direct relevance for the EBA:

- Lead the stress-test of the EU acquis, with a view to eliminate overlaps and burden by coordinating with the whole College.
- Make proposals on reducing administrating and reporting burden.
- Support the drafting of Annual Progress Reports on Enforcement and organisation of Implementation, and Implementation Dialogue
- Improve Better Regulation (rules on lawmaking), including SME and competitiveness check, new impact and cost assessment.
- Develop a new consultation approach: Reality Checks.
- Progress on the digital euro.

Many of these areas are already included in this SPD and discussed hereafter. Necessary adjustments will be made once the co-legislators will have finalised their priorities for the new legislature.

Data strategy and reporting burden

The **EU data strategy** aims to create a single market for data and promote data-driven innovation, with improved supervisory data collections[1] and a European Single Access Point (ESAP) to company data for investors. The EC's 2024 work programme calls for a 25% reduction of the reporting burden through regular reviews, a reuse of reported data and easier data sharing between authorities.

The EBA contributes to this strategy through its EUCLID platform which collects reporting from a wide and growing range of financial entities (banks, IF, payment providers, all DORA TPP users, and MICA ARTs and EMTs. It will deliver a Pillar 3 data hub (including ad hoc pre-populated templates for smaller financial institutions). As part of its data integration strategy, it will develop a common data dictionary and data sharing infrastructure with key partners (ESAs, ECB).

2) Legislative files

CRR III /CRD VI

Applying in January 2025, the Banking package strengthens banks' resilience to shocks, implementing the final elements of the December 2017 Basel 3 Accord, facilitating a green transition, and strengthening supervisory enforcement. It conferred the EBA 140 mandates for technical standards, guidelines and reports to be delivered by 2028 covering a wide range of (often very technical) areas. Additional challenges may arise from the need to ensure a global level playing field.

CMU files continued

The ESIU plans to leverage private savings to support wider EU objectives and give a new momentum to Capital Markets Union files on which the EBA had already advised, including to support a green transition, the development of an integrated European framework for covered bonds, or national insolvency regimes. Work will continue on a Central Central Securities Depository and EMIR (see below).

Crisis management and deposit insurance

The EC 2023 CMDI proposal aims to facilitate an orderly market exit for failing banks of any size and business model, drawing on the experience of BRRD. While there is uncertainty on a final agreement, the EBA could be requested further advice during the negotiation. Current proposals include requests for five EBA technical standards, five guidelines and a report on implementation.

[1] https://ec.europa.eu/info/publications/211215-supervisory-data-strategy_en.

Retail and payments	The EC's retail payments strategy[2] envisages a single payments market which fully leverages innovation and benefits its citizens and firms. Its June 2023 proposals for a revised Payment Service Directive (PSD3), a Payment Services Regulation (PSR) and a Regulation on Open Finance (FIDA) build on technical advice provided by the EBA which could receive around 35 mandates to be delivered by 2027. In addition, the Instant Payments Regulation enacted in 2024 may involve follow-up work for the EBA beyond the mandates it will have delivered by end-2025.
Sustainable Finance	As mentioned above, the new EC has signalled its intention to revisit the granularity and practicality of the provisions arising from the Green Deal to ensure a proper balance between costs and benefits. The EBA will finalise the incorporation of ESG risks in the prudential framework as part of the banking package (see above), covering disclosure, supervisory reporting, supervision, risk management, governance, prudential treatment of exposures, stress testing, and risk monitoring. It will reflect any adjustments decided by the EU co-legislators.
Artificial intelligence	Excellence in AI and a trustworthy AI should allow people and businesses to safely enjoy the benefits of AI. A European approach will introduce safeguards to the functioning of markets and the public sector, and people's safety and fundamental rights. The EBA will reflect in its rulebook and risk analyses how AI and machine learning (ML) impact bank business and risk management approaches, financial stability and consumer protection.
Cybersecurity	The EU Cybersecurity Regulation[3] (Regulation (EU, Euratom) 2023/2841) requires the EBA like all institutions and bodies of the Union to substantially strengthen their cybersecurity setup.
Digital Euro	The EC's single currency package includes a legislative proposal for a digital euro as a complement to euro banknotes and coins. They mandate EBA and AMLA to issue guidelines on the interaction between AML/CFT requirements and the provision of basic digital euro payment services focussing on financial inclusion.
Consumers	While the EC has postponed its reviews of the Mortgage credit and Consumer credit directives, work in this area may resume towards 2028.
Investment firms	The EBA may contribute to a review of the IFD/R after its advice to EC in 2025.

3) New roles

DORA	Applicable in January 2025, DORA aims to strengthen the operational resilience of the EU financial sector towards Information and Communications Technologies. It streamlines, upgrades and complements existing rules for ICT risk management (including threat-led penetration testing) for a wide range of financial entities. It required the ESAs to enrich the Single rulebook, establishes them as lead overseers for ICT Third-Party providers critical to the EU financial sector, and put them in charge of a cyber incident reporting framework. After a ramp-up of their operational setup in 2025, the ESAs should operate in a steady-state manner over the 2026-28 period.

[2] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0592.

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

MiCAR	After a ramp-up of its operational setup early 2025 when MICAR fully applies, the EBA should operate in a steady-state manner over the 2026-28 period in relation to issuers of asset-referenced tokens (ARTs) and e-money tokens (EMTs). In addition to having enriched the Single rulebook in 2023-2024, the EBA will have to determine which of these ART and EMT issuers are significant, supervise those, and issue regular opinions at the request of national competent authorities on the regulatory classification of crypto assets. It will support the EC for its reports preparing the MiCAR review.
EMIR	From December 2024, EMIR3 requires the EBA to validate certain centralised initial margin models (IMM) used for non-centrally cleared derivatives transactions in coordination with national competent authorities. After having developed the necessary infrastructures, methodologies and processes in 2025, the EBA should become fully operational in 2026.
AMLA	In 2026, the EBA will have transferred all its standalone AML/CFT mandates, powers and resources to AMLA. Close cooperation will be needed to facilitate AMLA's start and ensure a consistent and holistic tackling of ML/TF risks of financial entities in the prudential framework.
4) Geopolitical and climate developments	Since early 2022, the geopolitical situation has become very unstable, with the war in Ukraine, acute crises in the Middle East, and elections bringing changes at the political level. Climate deterioration has accelerated globally and may need to accelerate the environmental transition. Cyber incidents represent a rising threat across the board. Against that background, economic and financial conditions are expected to deteriorate and create increasing challenges for the financial sector despite its remarkable withering of successive shocks in recent years. The EBA will maintain a high level of attention to such developments and coordinate closely with all relevant stakeholders with a view to facilitating risk identification through adequate tools and exercises for its stakeholders, and proposing relevant policy and crisis management responses as necessary.
5) EU and international cooperation	New legislations and cross-cutting challenges (conduct, cyber, ESG, NBFI…) require the EBA to intensify or establish relationships with other EU and international authorities and bodies in (e.g. ESAs' Joint Committee, ESRB, FSB, Basel Committee), including beyond the financial sector (e.g. NGFS, EFRAG, information security agencies). The EBA will support the EC in the context of the EU enlargement. The EU's association agreement with Andorra and San Marino also involves technical advice and new responsibilities.

SECTION II - MULTI-ANNUAL PROGRAMMING (2026-2028)

1. MULTI-ANNUAL PRIORITIES AND WORK PROGRAMME

3. This section describes medium term, strategic priorities and areas of work for the EBA, the actions involved, and how progress will be monitored. It takes into account existing and foreseeable mandates, including the outlook for the financial sector. The multi-annual priorities support the internal allocation of resources and sequencing of the work, and to keep focus. They also facilitate EBA's engagement with external stakeholders.[4]

4. In 2026, the EBA will start a new cycle of its activities after several years of negotiations and preparations for new legislations. Firstly, it will concentrate on the full implementation of the new rules (CRDVI/CRRIII, DORA, MICAR, EMIR, AMLA). Secondly, it will tackle new challenges arising from the risks and vulnerabilities outlook, including a changing geopolitical context and rising economic imbalances, as well as from the transformation of the financial sector through environmental and digital transitions. Finally, it will support the new EC's priorities and strategies for the financial sector (see Section I).

5. Against that background, the EBA will refocus its work on three priorities for years 2026-2028.

Three priorities for 2026-2028

Rulebook: Contributing to an efficient, resilient and sustainable single market	Risk assessment: Developing tools, data and methodologies for effective analysis, supervision and oversight	Innovation: Enhancing technological capacity for all stakeholders

6. The priorities and work programme may need to be refined as further details are provided by the European legislators on their objectives and initiatives for the new legislature and upon the guidance of related EBA's BoS discussions in 2025. Adjustments may also be warranted as a result of geopolitical, economic and financial developments.

Priority 1 – Rulebook: Contributing to an efficient, resilient and sustainable single market

7. This priority relates to EBA's core responsibilities of (a) developing a single rule book and (b) ensuring its consistent implementation for the activities and supervision of the financial entities in its remit, to contribute to an efficient, resilient and sustainable single market in financial services. After a decade of harmonisation work, the authority will strive to ensure the right balance for the comprehensiveness,

[4] The fact that one mission or responsibility is not mentioned does not imply that it will not be discharged or is less important but simply that the need for specific focus is lesser.

proportionality and simplicity of the rules, having in mind the EU legislators' objective of reducing reporting burden and the need to facilitate the use of the rulebook.

a) A single rulebook that is fit for purpose

8. The EU's CRR VI/CRDIII tasks the EBA with ca 140 new mandates to be delivered between 2024 and 2028, which will be done factoring in consistency and proportionality considerations. By mid-end 2026, the EBA will prioritise the Basel III implementation and the mandates related to the access to the EU market for third-country branches or consolidation in the banking system. By mid-2028, it will reflect on the intended and convergent application of the provisions.[5]

9. As part of the EU's European Savings and Investment Union, the EBA will be delivering supporting the establishment of Central Securities Depository functions and the stability of central clearing activities. It expects to further contribute to a revival of a secure securitisation market. Areas of focus will include 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.

10. The April 2023 EC's proposals for a strengthened Crisis management and deposit insurance (CMDI) aim to enable an orderly market exit for failing banks of any size and business model and better protect depositors through harmonising standards across the EU. They involve 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 EBA would be asked to issue requirements inter alia on the methodology for the calculation of the target level, elements to be contained in business plans, the methodology for calculation of estimated cost of intervention, calculation of DGS contributions, and information to be provided to depositors. Uncertainty about the final agreement impacts on when work on related mandates will start.

11. The EBA will contribute to EC's review of MICAR (Article 140) especially on the continuing suitability of the MiCAR perimeter, and depending on actions proposed by the EC's proposed in their interim and final reports to the European Parliament and Council by 30 June 2025 and 30 June 2027, respectively. Similarly, the EBA will advise on the EC's review of DORA (Article 58) in relation to (i) criteria for the designation of critical ICT third-party service providers, (ii) powers of the lead overseer, (iii) functioning of the Joint Oversight Network and Oversight Forum, (iv) voluntary nature of the notification of significant cyber threats and (v) the scope of the Regulation. This may result in revisions to the DORA technical standards, if recalibrations or new guidelines are needed.

12. In relation to payment services, the EBA may need to develop up to 35 new security, authorisation and consumer protection mandates included in the forthcoming PSD3 and PSR and FIDA proposals. It will take into account the expected increased uptake by consumers of instant payments as a result of the revision of the SEPA Regulation in 2024.

13. As the banking package includes a number of regulatory ESG-related mandates, the EBA currently plans to continue systematically embedding ESG in its regulatory and policy work, including in its GLs on SREP,

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

internal governance and remuneration policies in its work on the prudential treatment of exposures, and on stress testing by institutions and supervisors. It will take into account new developments as already signaled by the EC in this area.

14. The EBA will closely cooperate with the newly established AMLA and support it to ensure that ML/TF aspects are properly embedded in the prudential framework (CRD/CRR, PSD/PSR, MiCAR).

KPIs

	Indicator (and type)	Weight	Short description
A1	Number of technical standards, GL, reports delivered (Outputs [6])	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 / CSDR
A2	Number of technical standards, GL, reports delivered (Outputs)	20%	Number of technical standards, GL and reports delivered on time stemming from the implementation of DGSDIII / PSR-PSD-FIDA.

Indicators measure contribution to the single rulebook (the delivery of mandates follows different timelines).
This may be adjusted to introduce a KPI on simplification or competitiveness when more details are available from Commission

	Baseline	Target 2026	Target 2027	Target 2028
A1	80%	85%	90%	90%
A2	80%	80%	85%	90%

Baseline is based on achieving 80% delivery of the regulatory mandates set out in the EBA's annual work programme. Increasing targets beyond 90% is unrealistic as it removes room for manoeuvre and flexibility that is necessary to adjust to priorities to developments regarding the work programmes.

b) Targeted efforts to support convergence

15. The EBA will continue monitoring the implementation of the rulebook with a view to foster supervisory convergence and level-playing field, hence reducing any unnecessary regulatory and supervisory burden for financial entities within the Union.

16. The EBA's efforts in fostering convergence at an early stage include developments to help stakeholders understand how to practically and adequately implement regulatory the provisions; examples include monitoring reports on capital (CET1 and AT1) and liquidity (LCR and NSFR), supervisory convergence reports, and developing priorities for IRRBB monitoring. In the case of MICAR, the EBA will be responsible for monitoring asset-referenced and e-money tokens and issuing opinions at the request of NCAs on the regulatory classification of crypto-assets.

17. The EBA also develops tools to support competent authorities in their daily tasks: IFRS 9 benchmarking report, IRRBB heatmap and other benchmarking tools for supervisors. As regards MiCAR, EBA will foster convergence of supervisory practices regarding the authorisation and supervision of issuers of

[6] 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 - the human and financial resources used and the time required to produce outputs;
- Actions - the work carried out over a certain period of time, consuming resources and producing outputs in accordance with the objectives set;
- Outputs - what is directly produced or supplied through the agency intervention and identified based on its operational objectives;
- Results - the direct effects of interventions on the target groups;
- Impacts - 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.

ARTs/EMTs through a dedicated Crypto asset standing committee and discussions with NCAs on supervisory techniques. The EBA will also have intervention powers to prohibit or restrict activity related to asset-referenced or e-money tokens in relevant cases.

18. Considering a forward-looking perspective, proposals can be conveyed to the co-legislators on possible ways to improve convergence, through technical advice or views on how the regulatory framework is operating or could operate more efficiently within the EU but also internationally, with a view to ensuring competitiveness of the EU banking sector. A recent example is the report on stacking orders and capital buffers where further work could be useful with a view to provide technical advice on governance arrangements or on the simplification of the framework, with all its components, taking into consideration interactions and triggers between Pillar 1 and Pillar 2.

19. Convergence can also be further increased at a later stage of policy implementation, through in-depth reviews and follow-up measures for supervisors or institutions, and adequate communication. Contributing to convergence of supervisory and industry practices are also efforts carried out by the EBA in terms of peer reviews (see workplan in Annex XIV) or under the Q&A process, the participation in and monitoring of supervisory and resolution colleges, and training for supervisors including in the context of the Supervisory Financial Digital Academy.

20. Finally, convergence may come from enforcement measures such as the resolution of disagreements between competent authorities and breach of Union law investigations. Investigations and enforcement measures under MiCAR/DORA will also develop over the period as direct supervision and oversight commence. With the development of oversight and direct supervisory work, the EBA will look to consolidate its approach to enforcement and supervisory convergence, bringing a more consistent approach to the methods use across the different areas of its work.

KPIs

	Indicator (and type)	**Weight**	**Short description**
A	Convergence-enhancing initiatives	70%	Identify and implement supervisory convergence tools across the EBA's activities (e.g. supervisory priority-setting, supervisory colleges and handbook, statements and opinions, case studies, simulation exercises, monitoring and benchmarking, mediation, breaches of Union law)
B	Peer reviews	30%	Conclude 6 peer reviews and 6 peer review follow-ups

	Baseline	**Target 2026**	**Target 2027**	**Target 2028**
A				
B	2 + 3 (2025 planned)	2 + 2	2 + 2	2 + 2

Priority 2 – Risk assessment: Developing tools, data and methodologies for effective analysis, supervision and oversight

21. This priority relates to (a) EBA's responsibility of assessing risks and vulnerabilities in the EU/EEA banking and financial sector through regular and ad hoc analyses, as well as to (b) its new roles as i) the lead overseer of critical ICT-third party service providers, ii) supervisor of significant asset-referenced and e-money token issuers and iii) validator of certain EMIR IMM models, and (c) its need for reliable and adequate data supporting efficient methodologies and tools as an enabler of (a) and (b).

a) Regular and ad hoc EU-wide risk assessments

22. The EBA will continue enhancing its framework for assessing risks in the EU/EEA banking sector in general, to be well equipped to identify and respond to evolving risks. It will integrate ESG and NBFI risks across the framework and regularly provide a set of indicators. The current volatile geopolitical and economic circumstances and related uncertainty require substantial effort to track and report related developments in and challenges to the EU/EEA banking sector, using the EBA Risk Assessment report as a key communication tool with stakeholders.

23. The EBA's stress testing capacity and experience will be further leveraged. In addition to developing top-down elements, greater consideration will be given to tackling cross-sector topics such as climate-change related risks –transition and physical – or NBFI leveraging the experience of the "Fit for 55" climate scenario analysis performed along with other ESAs and the ECB in 2024. The availability of (currently limited) resources will be key to ensure progress in this area. As supported by the BoS the EBA will work with its members on enhancing the collective infrastructure and technology to reap synergies, economies of scale and scope, rely on existing advanced capacity of trusted partners, and facilitate cooperation amongst all stakeholders for developing methodologies and models, storing and sharing data and tools, and executing the stress tests. As such initiatives may require new data sets, supervisory data collections may need to be reduced in other less relevant areas due to the reporting burden objectives.

24. Regarding the financial sector's operational resilience, the EBA will operate a cyber incident coordination mechanism with the two other ESAs and carry out assessments of major ICT-related incident information, and of the threat and vulnerabilities landscape, which should benefit all stakeholders and facilitate synergies amongst them.

KPIs

	Indicators (and type)	Weight	Short description
A	Key milestones to upgrade of ST methodology and development of a hybrid model	70%	1. Approve revised 2027 EU-wide stress test framework by Q1 2026. 2. Design new ST methodology by end-2026. 3. Implement revised EU-wide stress test framework for the 2027 exercise. 4. Further develop the stress test framework (e.g. more top-down elements)
B	Design regular climate stress test and Guidelines on climate scenario analysis	30%	1. Development of regular climate stress test. 2. Development of Guidelines on climate scenario analysis. 3. Implementation of regular climate stress test.
Indicators measure contribution to assessment of risks in financial sector and to green transition			

	Baseline	Target 2026	Target 2027	Target 2028
A	Work plan	70% (preparation for 2027 exercise)	100%	70% (preparation for 2029 exercise)
B:	Work plan	70% (of regular climate stress test)	100% (of regular climate stress test)	70% (of regular climate stress test)

b) Effective oversight and supervision (DORA, MICAR, EMIR)

25. DORA foresees that one ESAs will be appointed as Lead Overseer for each critical ICT service third-party provider (CTPP). To ensure efficient oversight activities, the ESAs will run a joint oversight function

which will pool the resources allocated by the legislation to carry out the oversight tasks with the support of NCAs in the Joint Examination Teams (JETs). This will ensure maximum consistency in the approach towards CTPPs, optimise the use of resources (avoiding redundancies) including for their allocation over time, and facilitate the development of a common oversight culture in a largely unchartered territory. The EBA and its partners expect start the oversight activities with the first designation of CTPPs in the second half of 2025 and to be fully operational in 2026.

26. MiCAR gives the EBA the responsibility of assessing the significance of ARTs and EMTs on an annual basis. Additionally, issuers may voluntarily request their home competent authority to classify their ART or EMT as significant. The EBA will conduct such assessments and reassessments based on reported data, and in the case of voluntary requests for classification, based on a notification from the competent authority and demonstrated likelihood that the ART or EMT will fulfil MICAR criteria. Once an ART or EMT is classified as significant, the relevant supervisory responsibilities are transferred from the respective competent authority to the EBA, and vice versa. Given the uncertainty of the population of significant issuers, the EBA will rely on a quickly scalable setup. In addition, the EBA has to establish, manage and chair a supervisory college for each issuer of significant ARTs and significant EMTs.

27. The EMIR review mandates the EBA to develop a framework for the validation of certain centralised initial margin models (IMM) used for non-centrally cleared derivatives transactions. This should contribute to synergies and simplifications for concerned financial entities and their supervisors. The EBA will shape its central validation function in collaboration with the NCAs and other international authorities such as from the US given the prominence of the specific models in this remit. Resources were foreseen for running the validation function but not to set it up.

KPIs

	Indicator (and type)	Weight	Short description
A	Performance of DORA oversight of CTPPs	50%	Implementation of the oversight of CTPPs jointly with EIOPA and ESMA.
B	Performance of MiCAR supervision activities (Outputs / Results)	50%	As part of the MiCAR mandate, EBA undertakes significance assessment of issuers of ART/EMT and, if applicable, carrying out MiCAR supervisory activities in accordance with the supervision plan
	Updated indicators measure preparation for and execution of new activities.		

	Baseline	Target 2026	Target 2027	Target 2028
A	CTPPs oversight	Execution of a first year oversight programme (all CTPPs covered, first batch of oversight activities)	Fully-fledged oversight activities; first batch of remediations achieved by CTPPs	Objectives in the oversight to reduce interdependencies and systemic ICT risks
B	Work plan	Significance assessment of ART/EMT within set timelines and procedures and if applicable execution of annual supervision plan	Significance assessment of ART/EMT within set timelines and procedures and if applicable execution of annual supervision plan	Significance assessment of ART/EMT within set timelines and procedures and if applicable execution of annual supervision plan

c) Adequate data, tools and methodologies

28. A review of the EBA Data Strategy in 2025 will help ensure that its data sets, infrastructure, analysis tools and processes meet the demands of risk assessment, stress testing, supervisory and oversight tasks in years 2026-28. Building on its data infrastructure (EUCLID), the EBA will continue to develop

data and analytical services for internal and external stakeholders, building on recent innovation and AI, under high standards of timeliness and reliability.

29. The EBA will further develop its offer of regulatory data to a broad audience with a special focus on analysts and researchers in order to best support market discipline and policy development. The Pillar 3 data hub will cover all prudential disclosures for credit institutions and the EBA will also provide a platform with comprehensive sets of easily accessible aggregated data. The EBA will continue to build capabilities for regular data sharing and exchanges between authorities to avoid duplicated data requests and maximise efficiencies for public authorities and reporting institutions. Changes are also envisaged by the legislators to facilitate the sharing of reported data between the ESAs, CAs, and with the EC, and with other stakeholders. In the area of MICAR, a shared reporting platform derived from EUCLID will limit reporting burden for submitting entities and ensure timeliness and a broad market view at a low cost for authorities. Capacity to use other, external, data sources will be built to support new tasks and ensure efficient, reporting-neutral data acquisition.

30. By increasing the use and re-use of regulatory data the EBA will contribute to the EU Supervisory Data and Strategy. Reducing the reporting burden will continue to drive EBA's reporting processes through the development of a common data dictionary and integrated reporting frameworks together with ongoing review of proportionality of the reporting framework. Specifically, 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 with a view to make the reporting process more efficient and less costly for reporting entities. Data collections will be systemically envisaged in line with the principle of proportionality.

31. The EBA will intensify its efforts for developing with relevant stakeholders a consistent and integrated reporting system for collecting statistical, resolution and prudential data to further increase standardisation, by way of common definitions and avoidance of redundancies. The EBA upgraded data dictionary (EBA-EIOPA DataPointModel 2.0) will form the basis for the common data dictionary for the banking sector and work will continue to complete integrate of glossaries to form a common data dictionary covering statistical, resolution and prudential data.

KPIs

	Indicators (and type)*	Weight	Short description
A	Timeliness of reporting (%)	25%	EUCLID: Accepted modules/ Expected modules,by remittance date +10 working days (wd)
B	Completeness of reporting (%)	25%	EUCLID: Not reported/ Expected templates, by remittance date +10 wd.
C	Accuracy of reporting (%)	25%	EUCLID: Failed error rules/ Total of error rules executed per file, by remittance date +15 wd.
D	Time to publish Quarterly Risk Dashboard (nr days)	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 measure data quality and timeliness		

	Baseline	Target 2026	Target 2027	Target 2028
A	85%	> 85%	>85%	>85%
B	1%	< 1%%	< 1%	< 1%
C	0.25%	< 0.25%	< 0.25%	< 0.25%
D	30	< 30	< 30	< 30
	Timeliness, completeness, and accuracy results are based on largest institutions only and calculated considering the main supervisory modules. Indicators are stable due to continuously increasing data scope and new reporting.			

Priority 3 – Innovation: Enhancing technological capacity for all stakeholders

32. EBA's third priority is to (a) enhance technological capacity within the financial sector with (b) special attention paid to consumer protection. This will be supported by the EBA's involvement in the ESA's European Financial Innovation Forum, which it will chair in 2026, and the EC's SDFA, to promote cross-sectoral and cross-disciplinary dialogue on innovation issues.

a) Enhancing technological capacity

33. Digital operational resilience and innovation are closely linked, and innovation-related work will be undertaken in close liaison with the DORA joint oversight function. Interlinkages include operational tasks (e.g. incident information assessment, coordination of threat-led penetration testing, and operation of the EU systemic cyber incident coordination framework), as well as supervisory capacity-building and convergence work (e.g. development of reports on incident trends and information, issuance of warnings and statistics on ICT threats and vulnerabilities).

34. To enhance technological capacity for all stakeholders, the EBA will continue promoting the application of innovative SupTech and AI based technologies as a key driver of operational performance and productivity. It will encourage joint projects and data sharing to leverage on collective expertise and resources with NCAs and other EU agencies, and identify SupTech tools that can enhance the oversight and supervision performance, with an emphasis on tools with potential common interest among authorities. EUCLID and its extension with calculation, validation and dissemination capabilities, will remain EBA's SupTech flagship platform. Additionally, EBA plans to move towards code and data sharing with NCAs (ie Net Interest Income platform) and implement AI algorithms and machine learning capabilities, with the vision to become a data driven organisation.

35. To foster innovation while maintaining high standards of consumer protection, the EBA will continue work on priority innovative applications focussing on artificial intelligence and machine learning (AI/ML) applications in the EU's banking and payments sector. In this area, the EBA will continue to broaden and deepen its work to facilitate the implementation of the AI Act by financial institutions within EBA's scope of action and by competent authorities. This will be underpinned by a dialogue on the intersection between AI Act and sectoral requirements, guidance for industry and competent authorities, and other actions to promote supervisory convergence. The EBA will deepen its engagement with the AI Office.

36. In view of the growing application of these technologies in the EU banking and payments sector, including Generative AI, the EBA will continue to monitor market developments and facilitate knowledge sharing between the industry and authorities and amongst authorities. The EBA will continue to assess opportunities and risks relating to these technologies with a view to taking forward such actions as are appropriate based on the outcome of this assessment.

37. EBA will continue to monitor market developments in other areas (e.g. crypto activities outside MiCAR, value chain developments), to identify opportunities and risks and propose or take appropriate actions to address possible supervisory or regulatory issues.

KPIs

	Indicators (and type)	Weight	Short description
A	Policy response and supervisory convergence in financial innovation (Results/ impacts)	10%	Monitoring innovation, contributing to a common approach towards innovative financial activities, providing advice to co-legislators, through: i) dedicated contributions; ii) knowledge sharing (EBA structures, EFIF, SDFA, events); iii) training (SDFA).

	Baseline	Target 2026	Target 2027	Target 2028
A	>1 initiative	2 initiatives 75 % reviewed materials for SDFA	3 initiatives 90 % reviewed materials for SDFA	> 3 initiatives 100 % reviewed materials for SDFA

b) Consumer protection

38. The EBA will further monitor how technological innovation in the financial industry and supervisory practices affect consumers and market confidence. This will cover the impact of AI/ML mentioned above, with a focus on creditworthiness assessments for loans, which the AI Act identifies as a high risk.

39. In relation to payment services, for the EBA to be able to deliver the mandates under PSD3/PSR/FIDA (Priority 1) and to do so in a way that protects consumers, the EBA will take a strategic approach to the monitoring of payment services in the EU. This will include monitoring the market itself – the providers operating within it, the services they offer, and the business models they operate— as well as the interaction of the various pieces of EU payments law. The aim is for the EBA to address issues proactively and, thus, contribute to the legislative requirements fulfilling their stated objectives of making payment services competitive, innovative, and convenient and secure for consumers to use.

40. The EBA will analyse consumer and conduct of business issues arising from crypto assets. It will work with NCAs to promote convergence in the transition phase leading to full application of the legislation, as well as with ESMA as many potential consumer protection issues are also relevant for investors.

41. In the area of depositor protection, and beyond the mandates foreseen by the revised Deposit Guarantee Schemes Directive as part of the CMDI package (see Priority 1), the EBA will propose practical steps to ensure that its standards and guidelines are implemented consistently and ensure that customer deposits are safe in the event that their bank becomes insolvent.

42. The EBA will report on consumer trends in its biennial Consumer Trends Report, in addition to the annual Retail Risk Indicators included in the Risk Assessment Report (Priority 2). Both sources of information will influence the EBA’s consumer protection priorities for the subsequent two years.

43. By 2026, the EBA will have transferred its 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. After the transfer, the EBA will establish a liaison function to facilitate cooperation and information exchanges with AMLA. This will serve to identify and tackle ML/TF risks at the intersection of payments and consumer protection law as well as through the supervision of prudential requirements.

KPIs

	Indicators (and type)	Weight	Short description
A	Effective retail conduct supervision for consumer protection (Results / Impacts)	100%	(i) thematic reviews, (ii) peer reviews and (iii) actions in response to information EBA's Consumer Trend Reports and retail risk indicators; (iv) set up supervisory cooperation fora.

	Baseline	Target 2026	Target 2027	Target 2028
A	>1 initiative	1 initiative	1 initiative	1 initiative

2. HUMAN AND FINANCIAL RESOURCES – OUTLOOK 2026-2028

44. The outlook for human and financial resource needs for years 2026-2028 takes into consideration the expected evolution of tasks for the period as described earlier considering SDFA, DORA, MiCAR, EMIR and the establishment of AMLA, and the 2021-2027 multi-annual financial framework (MFF).

2.1. Overview of the past and current situation

Human resources

45. Excluding DORA and MICAR fee-funded positions which could not be filled ahead of the application of corresponding legislations, the EBA achieved a 97% occupancy rate for its 260 posts in 2024. In 2025, while the number of fee-funded positions (DORA, MICAR, EMIR) foreseen by the EU LFS increases by 10 bringing the total number of posts to 270, the number of EBA posts funded by EU and member states contributions is unchanged.

STAFF		2024 Year N-1		2025 Year N
ESTABLISHMENT PLAN POSTS	**Authorised budget 2024**	**Actually filled as of 31/12/2024***	**Occupancy rate +**	**Authorised staff**
Administrators (AD)	151	147	97 %	151
Assistants (AST)**	11	10	91%	11
Assistants/Secretaries (AST/SC)	-	-	-	-
SDFA***	1	1	100%	1
MiCAR****	20	1	(50%)	22
DORA*****	6	3	50%	8
EMIR******	-	-	-	**3**
TOTAL EP POSTS	**189**	**162**	86% **(98%)**	**196**
EXTERNAL STAFF	**FTEs in the authorised budget**	**Actual FTEs as of 31/12/2024 N-1**	**Execution rate +**	**Authorised positions**
Contract Agents (CA)	50	50	100 %	50
SDFA***	-	-	-	-
MiCAR****	2	2	100 %	2
DORA*****	-	-	-	2
Seconded National Experts (SNE)*******	19	15	79 %	19
EMIR ********	-	-	-	1
TOTAL EXTERNAL STAFF	71	67	94 %	74
TOTAL STAFF	**260**	**229**	88% **(97 %)**	**270**

+ Percentages in brackets are showing the real occupancy rate without the MiCAR/ DORA fee-funded posts that cannot be filled.
* Filled posts include offer letters accepted.
** 1 AST4 for IT DORA recruited (EU/NCA funded from 2024 until September 2025, then fee funded). In 2025, 1 additional AST4 for DORA.
*** 1 TA/AD6 from DG REFORM for SDFA since 2023) and 1 CA/FG IV from DG REFORM for SDFA not shown above as per EC requirements.
**** 15 TA/AD MICAR posts. 2 CA/FG IV EU/NCA funded for indirect supervision tasks for MiCAR representing a total of 53 CAs for 2024.
***** 18 ADs and 6 ASTs for DORA from 2025 pooled by ESAs, with 6 TA/ADs and 2 TA/ASTs (o.w. 1 AST4 for IT recruited in 2024) at EBA.
****** 3 TA/AD posts and 1 SNE posts, all fee-funded from 2025 for EMIR IMM.
******* 9 cost free SNEs hosted at EBA. .

Financial resources

46. The EBA achieved a 99.9% execution of its 2024 budget. It managed to absorb a substantial EU salary indexation within the authorised budget. Based on the 2021-2027 MFF, the 2025 budget was adopted by the BoS budget on 19 December 2024 for a total amount of EUR 59,222,101 including contrutions from the French government contribution, DG REFORM, and DORA fees to be levied.

EXPENDITURE by budgetary title and chapter	Executed budget 2024	Budget 2025
Title 1 Staff expenditure	**36,709,753**	**39 705 588**
11 Salaries and allowances	34,521,375	34 149 426
- of which establishment plan posts	*25,709,400*	*27 494 223*
- of which external staff	*5,950,202*	*6 655 203*
11.33 Employer's pension contribution	2,861,772	3 231 000
12 Expenditure relating to staff recruitment	324,779	399 298
13 Mission expenses	112,207	128 100
14 Socio-medical infrastructures	639,492	809 290
15 Training	455,832	446 120
16 External services	518,905	404 291
17 Receptions and events	137,163	138 063
Title 2 Infrastructure & operating expenditure	**12,352,670**	**12 040 674**
20 Rental of buildings and associated costs [7]	4,955,855	4 664 107
21 Information and communication technology	6,527,336	6 566 822
23 Current administrative expenditure	538,060	469 429
27 Information and publishing	331,419	340 316
Title 3 Operational expenditure	**8,217,083**	**7 475 839**
31 General operational expenditure	2,110,029	2 392 707
32 IT expenditure for operational purposes	6,107,055	5 083 132
TOTAL EXPENDITURE	**57,279,506**	**59 222 101**

Note: The 2024 figures i) include expenditure on projects and services (e.g. accounting, procurement, audit) partly recharged to other EU agencies, and expenditure using assigned revenue; ii) exclude the execution on commitments carried over from 2023.

2.2. Outlook for the years 2026-2028 (new and growth of existing tasks)

New tasks

47. Three new legislations applicable in 2025 bring new tasks to the EBA which will need to be fully operational from 2026 onwards: DORA, MICAR and EMIR. They are all fee-funded. Details on their general objectives can be found in Section 1 General context (New roles), and on their forward-looking resourcing in Section 2.5 Resource programming 2026-2028. Moreover, the EBA expects to contribute

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

to the new EC's strategies on improving the competitiveness of the EU, simplify its regulation or make it more proportionate, and reduce reporting burden for the financial sector (see Section 1).

Growth of existing tasks

48. EBA's work will grow in eight main areas (see also Section 1 General context and their forward-looking resourcing in Section 2.5 Resource programming 2026-2028).

CRD/CRR	The banking package will remain the main driver of EBA's policy work until 2028 as a result of the c.140 mandates received for standards, guidelines and reports. Despite the sequencing facilitated by the EC and the experience and skills of the authority in this area, this will represent an unprecedented and very heavy workload over several years as no additional resources have been allocated.
Payment services and open finance	The situation is further exacerbated by the c.45 mandates expected to be received from the proposed PSD3, PSR, FIDA (Open Finance) and DGSD, most of which would have to be delivered between 2025 and 2027. So far, no additional resources have been foreseen for the EBA either. Catch-up will be necessary on several payment services and consumer-related mandated which had been streamlined, spaced out or postponed due to internal redeployments to support DORA and MICA preparations. Ongoing negotiations on the CMDI and deposit insurance frameworks may require support from the EBA the discussions before implementation mandates.
ESG	From a policy perspective, the EBA will continue developing the mandates requested from the EU legislators regarding the three pillars of the prudential framework. On top of the existing mandates, further requests for EBA's engagement are expected in particular in the areas of transparency, labelling and greenwashing risk. The EC has already indicated that it will adjust several features of the current ESG framework, which is expected to bring important work for the EBA on existing and envisaged prudential, reporting and disclosure provisions. Moreover, the EBA will increasingly focus on monitoring, risk assessment and other analytical tasks (see also stress-testing). The EBA will establish an ESG risk monitoring framework and provide regular updates on selected indicators to inform stakeholders on the characteristics, progress and risks of the environmental transition.
Stress testing	The EBA will continue working with its members on a strategy to provide a better cost-benefit for financial entities and supervisors when performing the EU-wide stress test required by its founding regulation. The general direction was endorsed by the BoS in 2024, drawing on lessons learned from the 2023 edition and further developments for the 2025 one, including from the introduction of top-down modules. Moreover, building on the first climate EU-wide pilot exercise on climate risk[8] and the experience of the ESAs' one-off coordinated sectoral Fit for 55 climate scenario analysis, the EBA will continue developing a regular climate stress test and consider whether this can be incorporated in its regular stress-test exercise. Finally, there will be discussions about developing stress-testing for NBFI, which could benefit from the EBA expertise.

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

	While stress-testing is one of the few forward-looking risk assessment approaches available, these various strands will require thorough and sizeable quantitative and data analytics skills. This will require an analysis of existing reporting with a view to complementing or rebalancing it.
Reporting	In the context of its integrated reporting initiative with ECB and competent authorities launched in 2024, the EBA will have to enter into the specifics of prudential and statistical reporting in order to build a common dictionary and then operationalise it. Moreover, the EC call for revisiting the relevance and granularity of harmonised reporting.
Regulatory and supervisory cooperation	New legislations and cross-cutting challenges (conduct, cyber, ESG, NBFI…) require the EBA to intensify or establish relationships with other EU and international authorities and bodies in (e.g. ESAs' Joint Committee, ESRB, FSB, Basel Committee), including beyond the financial sector (e.g. NGFS, EFRAG, information security agencies). The EBA will support the EC in the context of the EU enlargement. The EU's association agreement with Andorra and San Marino also involves technical advice and new responsibilities
SDFA	The EC DG Reform-sponsored EU SDFA program[9] started late 2022 for three years to: i) train supervisors on technological innovation in financial activities; and ii) leverage supervisors' practical experience for EU policy development. EBA, EIOPA and ESMA designed and delivered the training, with funding from DG REFORM under a contribution agreement. Given the success of this initiative the SDFA is expected to continue its activities for another 3 years until end 2028 with a corresponding extension of the resources (to be confirmed in the first quarter of 2025).
Ad hoc requests	The EBA has demonstrated its capability to adjust its work to deal with urgent requests by the co-legislators, which often have a strong quantitative component. It has responded to 4 calls for advice per year on average over the past five years, including unplanned ones. Other ad hoc requests 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. As the new EC will define its priorities and strategies, the EBA expects that it will receive new such requests on top of those which are on-going or announced.

2.3. Strategy for efficiency gains

49. EBA's strategy for efficiency gains relies on three pillars: a flexible organisation, modern tools, and a collaborative approach. This allowed the EBA to achieve its work programme at very high levels in recent years despite a substantial number of new requests and no additional resources (the share of executed tasks of these respective years' work programmes was 91% in 2021, 94% in 2022, 95% in 2023), and is expected - based on provisional results - to be reach the self-imposed target of 90% in 2024.

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

Flexible organisation

50. **Portfolio of activities**. To facilitate internal synergies and cross-fertilisation, the EBA is constantly reviewing its portfolio of activities and has streamlined the total number of activities from 37 to 25 in 2022, and to 19 since 2023. As encouraged by the BoS, it will intensify its efforts to better relate inputs and outputs to the complexity and intended outcomes of its tasks (scoping notes for better simplicity and proportionality). The EBA has reduced the relative share of its administrative support and coordination to business resources (11.6% vs 84.6%) and is preparing for onboarding new-fee funded staff without requesting new HR, IT or Finance resources.

51. **Living organisation**. Evolutions to the setup are regularly introduced to best tackle evolving activities. This included creating in 2021 a standalone Data department and dedicated AML, ESG, and Reporting and Transparency units, to reorganize the setup for equivalence and for Q&A in 2022. In 2023 and 2024, ca 25 FTEs were redeployed for DORA and MiCAR policy and oversight preparatory work (including 36 mandates for technical standards, guidelines, advice…) which resulted in other tasks being temporarily streamlined or postponed. For cross-cutting tasks, temporary team leaders coordinate internal resources and keep focus. In 2024, the EBA introduced a Joint Oversight Venture (see below).

52. **Planning and controlling**. The dynamic allocation of resources is facilitated by an activities-based tool developed in house with a rolling 3-year horizon: EBA's Tool for Handling Operations and Resources (THOR) was piloted in 2022 (in Excel) and rolled out since 2023 (Access Database). Since 2024, an internal Task force on Accountability, Synergies and Consistency (TASC) strives to optimise the cost-efficiency and consistency all EBA documents prepared for purposes of planning and accountability.

53. **Working arrangements and sustainability.** The EBA has introduced hybrid work, implementing EC's decision by analogy, in June 2022. It will continue its efforts towards creating flexible, digital, sustainable and efficient workplace. In line with its EMAS accreditation by French authorities in 2022, it has reduced its number of business travel by half compared with 2019 and only consumes renewable energy. It continuously invests in improving its environmental performance and reducing its carbon footprint (decarbonizing operations and implementing circular economy principles see also Annex VII).

Modern tools

54. **EBA's Horizon 2029 Talent strategy.** It supports staff engagement, performance and development for the benefit of both staff (to keep a high level of qualification and motivation) and the organisation (to have the right skillsets and reach its objectives). First achievements included: internal and external mobility (10 personnel swap arrangements with other authorities in 2025 vs. 5 in 2024); induction visits with EC; outreach (short-term expert onboarding, alumni network); staff care (e.g. wellbeing, D&I, Mental Health First aiders); leadership programme. Results look encouraging with staff satisfaction at 72% in the 2024 Staff Engagement Survey and a 85% participation (+7 and +14 ppt vs. 2022).

55. **EBA's 2020-2025 IT strategy**. It allowed to embed new technologies, with expected long-lasting gains. A Collaboration platform has reduced emails and supports integrated operating models (replacement of the extranet; DORA Oversight collaboration space for ca 30 ESA and 90 external JET members). The move to cloud-based big data technologies has benefited the new stress-test modules (NII) among others. The EBA is exploring AI use cases which could bring productivity gains to its processes. Virtual-

LEIs may ease workload and secure collections from banks (Pillar3 Data Hub) and issuers of crypto assets (MiCAR reporting - see below). Key HR processes are being digitalised and a more interactive Single rulebook is envisaged. An enterprise-level Identity and Access Management capability will provide a less-labour intensive a role-based access for both internals and externals in over 48 information systems.

56. **Data collection and dissemination.** EUCLID (EBA's European Centralised Infrastructure of Data) and EDAP (EBA's Dissemination platform) enable data flows between diverse endpoints and provide access to high-quality, curated data and insights to internal and external stakeholders. Both platforms will be expanded to MiCAR, Pillar 3 disclosures, and from 2026 to PSD3, PSR, FIDA and EMIR datasets.

Collaborative approaches

57. **Competent authorities.** The EBA collaborate closely with competent authorities in the 27 member states and the EEA: ca 1,500 of their staff members are involved in its governing bodies and working structures. This provides first-hand expertise and synergies and allows the EBA and CAs to complement each other, especially in the context of new responsibilities, such as crypto asset supervision for which a coordination group was operated in 2023-2024 to prepare for the new tasks. This was also the case for DORA, including through a collaboration with ENISA for the use of their reporting platform (CIRAS) for starting cyber incident reporting.

58. **Reporting**. The EBA and EIOPA have developed a common *Data point model* for the insurance, pension fund and banking sectors (DPM 2.0) for more efficient data modelling, use-cases, and data types in supervisory reporting. The ECB will also use it for its own next generation data platforms (iREF). The EBA, EIOPA and ECB started in 2024 a *DPM Alliance* to jointly govern the future use, evolution and support of DPM2.0, for the benefit of competent authorities, Vendors, supervised entities. EBA and EIOPA have jointly developed *DPM Studio*, a digital regulatory reporting software product that allows them, the ECB and competent authorities to efficiently model reporting requirements in the insurance, pension fund and banking sectors using the DPM 2.0 standard. EBA and EIOPA will make the source code of DPM Studio available to interested NCAs for optimizing their own reporting activities. Finally, the EBA has started a cost-benefit assessment of least used harmonised reporting.

59. **DORA Joint Oversight Venture**. To tackle their new oversight responsibilities over CTPPs, the EBA will be pooling resources with EIOPA and EBA in a common department reporting to the three executive directors. This approach is a first between EU agencies. It will bring consistency regarding the way the activities are carried out and reap substantial synergies (no duplications, one reporting line, internalised coordination, joint recruitments, easier allocation of resources among the three ESAs over time).

60. **MICAR reporting**. EBA and competent authorities will develop in 2025 a creative approach to collect reporting from issuers of ARTs and EMTs. Rather than having authorities each develop separate reporting systems, a common platform derived from EBA's EUCLID will provide a unique and stable reporting point for issuers, allow authorities to access more timely information on both the issuers' activities and the market as a whole, creating new synergies and lowering costs.

61. **Procurement**. The EBA systematically seeks to include other agencies in its procurement procedures. In 2024, the EBA was lead agency on six inter-institutional procurement procedures, with a total value

estimated at EUR 7 401 123 in which a total of 26 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 2024, 74 % of the EBA's 172 framework contracts in force (resulting from 77 procurement procedures) were procured by other EU entities – see table below.

Procurements	Lead	EBA	COM	Other agencies	Other	Total
Procurement procedures completed Q4/2024		6	12	9	1	25
Framework contracts		45	73	40	14	172

62. **ESAs**. 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. It allows to devise common approached for a number of cross-cutting areas, such as financial risk assessments, ESG, financial conglomerates. A recent achievements was the Fit-for-55 stress-test carried out under his aegis. It will prove instrumental in coming years to tackle topics like ESG again, NBFI, ESIU, and securitisation among others. The ESA senior management and experts also have an on-going dialogue to align on organisational issues of common interest.

63. **EU agencies**. The EBA actively contributes to the two key pillars of the EU Agencies Network multiannual strategy (1) EU Agencies as role models for administrative excellence (2) EUAN as a valued institutional partner" by increasing efficiency through a better sharing of services, knowledge, best practice and pooling of tasks (e.g.: SLA with CPVO on procurement function).

64. **Accounting**. EBA has been sharing an accounting function with ESMA since 2021 to enhance the synergies between the two Paris-based authorities. The arrangement also include EIOPA's accounting officer for reciprocal back up.

65. **Public cloud**. EBA and EIOPA have jointly migrated to Public Cloud in 2023-2024 using the EC's Cloud-2 framework contract. Following the migration (2023/2024), both agencies continue to collaborate daily in the usage of the MC10 sharing ideas and joining forces in optimizing costs, security hardening, change orchestration with their common vendor, best practice sharing.

66. **Security Officer.** EBA has a close collaboration with EIOPA and ESMA which have also migrated to Public Cloud, required similar Cloud Transformation programs, and are faced with the same security rules and regulations. While they work together to prepare for upcoming security framework changes such as the Cybersecurity Regulation, sharing current security resources will not be sufficient to meet the number of roles and diligences at agency-level which are required by the new legislation.

67. **Knowledge sharing**. The EBA's FinTech Knowledge Hub brings gathers competent authorities to engage with incumbents, new entrants, FinTech firms, technology providers and other relevant parties. It aims to enhance the monitoring of financial innovation, share knowledge sharing about FinTech, and foster technological neutrality in regulatory and supervisory approaches. In the same vein, the ESAs' European Forum for Innovation Facilitators (EFIF) provides a platform for supervisors to share insights from engagement with innovation facilitators (regulatory sandboxes and innovation hubs), technological expertise, and to reach common views on the regulatory treatment of innovative products, services and business models, overall benefiting bilateral and multilateral coordination.

2.4. Negative priorities/ decrease of existing tasks

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

68. The EBA will transfer powers and mandates that relate directly to AML/CFT and eight posts that were allocated to it in the context of the 2020 amendments to the EBA's founding regulation to AMLA on 31 December 2025. The EBA will retain the responsibility of cooperating with AMAL to ensure an appropriate tackling of ML/TF risk by the prudential supervision and contribute to the broader EU AML/CFT framework.

69. During the transition phase, the EBA's will support AMLA to provide continuity in the fight against financial crime and avoid disruptions for competent authorities and for financial institutions. In this regard, the EBA is liaising with the EC to provide advice on the modalities of the transition.

DORA policy development completed

70. In 2025, also with additional funding having been provided for the second half of 2024 and first half of 2025 to recruit DORA posts ahead of the collection of fees from CTPPS which are to be designated by end-2025, most of these initially redeployed resources will have returned to their primary areas of work - where their expertise was urgently needed to work on mandates conveyed on the EBA, e.g as part of the banking package or the revised payments services framework.

High turn-over of EBA mandates

71. The EBA's portfolio of tasks is composed of recurring or ongoing tasks as well as of one-off tasks. For The latter are subject to constant renewal as a result of the EU institutions new legislations to ensure that the legislative framework applicable to the bloc's financial sector is up-to-date and suited to meet new and unforeseen challenges, and to ensure alignment with globally adopted standards. This means that, even within its traditional areas of responsibilities, the EBA observes a high turnover of its specific mandates (a new one replaced a completed one). In addition, the EBA has a regulatory and supervisory convergence mandate and carries out peer-reviews and answers questions from the industry and supervisors. This leaves almost no room for own-initiative work.

2.5. Resource programme for the years 2026-2028

Human resources[10]

Number of staff requested

72. The outlook for human and financial resource needs for years 2026-2028 is based on the 2021-2027 multi-annual financial framework (MFF) and subsequent adjustments, including:

[10] The content of this section has been updated to reflect the input to the Commission's BadgeBud system in January 2024, and further updated to reflect the position at the end of 2024. The subheadings in this section are as per the Agency Statement that is incorporated into the EU Draft Budget.

- A reduction of 8 of EBA's posts funded by the EU and member states contributions: from 2026, 4 TA/AD7 and 4 CA FG/IV are transferred to AMLA.

- Additional fee-funded posts provided by new legislations:
  - DORA. The LFS provides for a total of fee-funded posts of 18 ADs, 6 ASTs and 6 CA/FG IV in 2026 and forward, equally shared among the three ESA in a joint oversight venture, i.e. for the EBA: 6 TA/ADs; 2 TA/AST, and 2 CA/FG IV. To recruit the right level of oversight expertise, a full grade range is foreseen: AD5, AD7, AD9, AD12, with 1 AST4 senior assistant and 1 AST recategorised as AST/SC as recommended by the Staff Regulations. It is planned to recruit all posts by 2026.
  - MiCAR. The LFS provides for a total of fee-funded posts of 20 TA/AD posts in 2026 and forward. Of the MiCAR fee-funded posts, a maximum of 3 TA/AD posts is expected to be recruited in 2026 based on current estimates about future significant issuers of ART and EMT crypto assets.
  - EMIR. The LFS provides for 3 fee-funded TA posts and 1 fee-funded SNE in 2026 and forward.

- An expected continuation of 2 posts funded by a DG REFORM contribution for the SDFA until 2028: 1 TA/AD6 and 1 CA/FG IV (to be confirmed).

Overall staff request

73. As discussed in Sections 1 and 2, independently from the new responsibilities for which additional fee-funded resources have been provided, the EBA is facing a sharp increase in the number of its mandates, with a peak expected in 2027 and 2028. It will also need to adjust to new requirements like the Cyber regulation. This is notwithstanding any further requests from the new EC.

74. As in previous years, the EBA expects to maximise the use of its resources, through large-scale internal redeployments, systematic prioritisation, effort differentiation and simplification, and other efficiency measures described in Section 2.3, and being mindful of ensuring sustainable working conditions for its staff. Moreover, resources are not fully fungible. After having exhausted all possibilities for efficiency gains, a gap in available resources remains during the period 2026 to 2028.

75. In 2026, the EBA therefore requests 273 posts: 201 temporary agents (TAs) as part of the Establishment Plan, 52 contract agents (CAs) and 20 seconded national experts (SNEs). This includes 6 new permanent posts and 5 new temporary posts for three years.

76. With the reduction of posts by 8 due to AMLA, the request leads to a temporary increase of posts by 3 for years 2026-2028 compared to the situation in 2025, and then to a decrease of posts by 2 after 2028.[11] As shown in the funding section below, given that some of the structure costs will be mutualised in the context of the new fee-funded posts, the EU and member states contribution would decrease in real terms and only increase by 1-2% annually in years 2006 to 2008, and decrease in nominal and real terms afterwards with the phasing out of the temporary 3-year posts.

[11] No additional HR resource is being requested despite the heavy burden that the DORA, MICAR and EMIR recruitments will represent for the HR function which is also implementing a 2024-2029 Talent strategy that was appreciated by the IAS. A benchmarking exercise of HR statutory staff posts vs Agency statutory staff posts revealed that the EBA HR unit would need one additional TA/AD6 post.

Additional permanent posts requested

Area of need	Number of posts / rationale	Job profiles/ grades
Cybersecurity	2 (1 TA/AD, 1 CA) to comply with Cyber regulation entered into force in 2024	- 1 AD6 Cybersecurity Expert - 1 CA/FG IV (IT security)
CRR III/CRD VI	1 (TA/AD) to deliver work on enlargement and broader international cooperation (third country equivalence assessment/ monitoring)	- 1 AD6 Policy Expert (EU regulatory equivalence)
Data for reporting, and stress testing	3 (2 TA/AD, 1 CA) with data analytical and quantitative skills – partly identified in previous SPD – to support EBAs and EC's reporting burden improvements and stress test	- 1 AD5 Banking Expert (Data) - 1 AD5 Banking Expert (Stress test) - 1 CA/FG IV (Data handling expert)
Total	6 FTEs permanently (4 TA/AD, 2 CA/FG IV)	

Additional temporary posts requested (for 3 years)

Area of need	Number of posts / rationale	Job profiles/ grades
CRR III/CRD VI:	3 (TA/AD) to cover c. 140 new mandates (credit risk / securitisation & covered, market risk, CSDR, market access) – flagged in previous SPD	- 1 AD6 Policy Expert (Credit risk) - 1 AD5 Policy Expert (Securitisation / covered bonds) - 1 AD6 Policy Expert (Market access)
DGSD, PSD3/PSR/FIDA	2 (TA/AD) to deliver the c. 45 mandates proposed under the revised payment services framework (34 mandates) and the revised Deposit Guarantee Scheme Directive (11).	- 1 AD7 Policy Expert (Deposit Guarantee Schemes) - 1 AD7 Policy Expert (Payment Services)
Total	5 FTEs for 3 years (5 TA/AD)	

Funding

Area of need	Rationale
EMIR	Funding for early recruitment of 3 fee-funded posts (2TA/AD7, 1 TA/AD5 and 1 SNE) during preparations

Vacancy rate as of end 2024

77. The authorised establishment plan for 2024 included 23 fee-funded posts proposed for the EBA in the initial MiCAR and DORA LFS and adopted by the Budgetary Authority in the General Budget 2022. Given that both legislations only enter into force in 2025, it was not possible for the EBA to levy fees in 2024 and recruit these posts. Excluding these posts, the end-2024 occupation rate was 98% for the 166 Temporary Agent posts in the establishment plan.

Standard abatement ('abattement forfaitaire')

78. For 2026, the EBA has budgeted for: 87 % occupancy rate (97 % budget impact for non-fee-funded TA positions – this takes into account an estimation for personal and other unpaid leaves); 99 % occupancy rate for CA positions, with 72.5 % only for SNE positions due to CAs' own resource issues.

Salary assumption for calculating salary line (% applied)

79. The cost of the TA & CA posts is based on the actual costs for existing staff at the end of 2024, adjusted with 2.0 % indexation annually.

Correction coefficient used

80. The correction coefficient applicable at the end of 2024 (114.2) is used for all years (2026-2028).

Exchange rate used

81. The exchange rates applied are those of 30 September 2024, in line with EC's Budget Circular, although the vast majority of EBA's financial transactions are denominated in euros.

Financial resources

82. The EBA's **revenue projections** stemming from the EU subsidy are set in the 2021-27 multi-annual Financial Framework (MFF), which also determines the NCA contributions (see calculation model in Annex III). The French government contribution as part of the French bid to host the EBA in Paris will be fully utilised by the end of 2027. Revenue from DG REFORM to fund the EBA costs of the Supervisory Digital Finance Academy (SDFA) is expected to continue to 2027, albeit at a lower level. The fees line includes expected fee revenue for DORA from 2025, and for MiCAR and EMIR from 2026.

EBA revenues until 2028	2025	2026	2027	2028
EU subsidy	21 303 298	21 556 465	21 987 594	22 427 346
NCA contributions: EU	35 034 213	35 551 748	36 291 796	37 017 632
NCA contributions: EFTA	1 084 651	1 100 673	1 123 585	1 146 057
French government	575 000	575 000	550 000	-
DG REFORM	329 939	245 520	245 520	-
Fees	895 000	6 730 000	7 620 000	7 772 400
Total revenue	**59 222 101**	**65 759 405**	**67 818 495**	**68 363 435**

83. As mentioned above (Human resources request for 2026), the additional 3 non-fee funded posts requested in 2026 result in a nominal annual increase of the EU and competent authorities that is 1.2% and 1.5% in 2026, respectively and then only 2% as a result of inflation in 2027 and 2028. This is due to some mutualisation of unchanged structure costs through fee-funded activities (see below).

Share of the various revenue sources and annual increase	2025	2026	2027	2028
Share of EU subsidy / Total revenue	36%	33%	32%	33%
Share of NCA contributions (EU) / Total revenue	59%	54%	54%	54%
Share of NCA contributions (EFTA) / Total revenue	2%	2%	2%	2%
Share of Fees / Total revenue	2%	10%	11%	11%

Share of the various revenue sources and annual increase	2025	2026	2027	2028
Annual nominal increase of EU subsidy		1.19%	2.0%	2.0%
Annual nominal increase of NCA contributions		1.48%	2.08%	2.00%

EBA expenditures until 2028	Budget 2025	Budget 2026	Budget 2027	Budget 2028
Title 1 Staff expenditure	**39 705 588**	**43,962,188**	**45,607,524**	**46,469,535**
11 Salaries and allowances	34 149 426	37,635,466	39,074,468	39,855,957
- of which establishment plan posts	*27 494 223*	*30,626,445*	31,845,839	*32,482,756*
- of which external staff	*6 655 203*	*7,009,021*	7,228,629	*7,373,202*
11.33 Employer's pension contribution	3 231 000	3,694,950	3,848,648	3,925,621
12 Expenditure relating to staff recruitment	399 298	364,328	371,615	379,047
13 Mission expenses	128 100	148,330	151,297	150,000
14 Socio-medical infrastructure	809 290	839,975	856,774	873,909
15 Training	446 120	527,480	538,030	530,000
16 External services	404 291	607,086	619,228	610,000
17 Receptions and events	138 063	144,573	147,464	145,000
Title 2 Infrastructure & operating expenditure	**12 040 674**	**14,347,554**	**14,634,506**	**14,618,363**
20 Rental of buildings and associated costs	4 664 107	5,469,346	5,578,733	5,690,308
21 and communication technology	6 566 822	7,890,074	8,047,876	7,900,000
23 Current administrative expenditure	469 429	615,025	627,325	639,872
25 Information and publishing	340 316	373,110	380,572	388,183
Title 3 Operational expenditure	**7 475 839**	**7,449,663**	**7,576,466**	**7,275,537**
31 General operational expenditure	2 392 707	3,044,607	3,105,499	3,007,760
32 IT expenditure for operational purposes	5 083 132	4,405,055	4,470,966	4,267,777
TOTAL EXPENDITURE	**59 222 101**	**65,759,405**	**67,818,495**	**68,363,435**

Budget for year 2026

84. 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 2026-2028 despite continuous efforts at internal redeployments of resources, efficiency gains and synergies. The significant increase in costs in recent years (inflation and related EU salary indexation) was not matched by an equivalent increase in funding: in particular, the average costs of temporary and contract agents will continue to put pressure on the total budget as the EU subsidy has not risen in line with the increase of the costs since 2023.

85. For DORA oversight, the ESAs have decided to work as "one team" and pull posts in a joint oversight venture reporting to the three ESAs' executive directors. Given the complexity of the task and a tight market for ICT experts, an upgrade of the grade structure foreseen in the DORA Legislative Financial Statement for the establishment plan is necessary, and the ESAs will be assessing where the number of posts is sufficient. The above figures may be reassessed in case of further inflation/indexation.

Financial resources – EBA request[12]

Title 1 – EU and NCA

86. Complementing the assumptions listed in the Human resources – EBA request section above, the following additional assumptions drive the Title 1 expenditure that is not funded by fees:

    1. Employer's pension contribution percentage: the double of the employee's contribution % (assumed = 12.1 % for 2025), of which 60 % of the employer's cost goes through the EBA budget and is funded fully by the NCA contributions;
    2. Average cost of EUR 77,870 per SNE;
    3. Given the success of the trainee scheme to date, the EBA will continue to aim to have ca 30 trainees, at an average cost of EUR 25,500 per trainee;
    4. Recruitment costs include provision for two vacancy procedures requiring management assessment centre, external participants on recruitment panels, and advertising in paid media;
    5. The budget includes 364 KEUR for taking up duty and removal allowances;
    6. EBA covers the cost of staff annual medical visits and pre-employment medicals, either via a framework contract with a Paris-based provider or via Commission medical services. The EBA offers flu vaccination in Paris via the framework contract;
    7. With staffing increases, the EBA also sees increases in the number of children of EBA staff, which drives an increase in the education contribution cost at all levels: nursery, primary, and secondary;
    8. Administrative missions cover missions for training and other purposes not linked to core budget, and includes travel insurance and travel risk management services;
    9. EBA will continue to cover the cost of admission to the Europlaza canteen, and to offer a home office contribution to staff for setting up their teleworking station;
    10. Resources permitting, Learning and development activity may increase by 15 % against 2024;
    11. Regarding external services, the EBA plans to undertake another staff engagement survey in 2026 and to require external services to assist with the implementation of the IAS action plan. Interim staff and staff exchange costs are budgeted at a higher level than in 2024;
    12. EBA funds staff and department/unit team-building events, and staff committee costs at a similar level as in 2024.

87. While not included in the budget request, the EBA sees the need for additional EU/NCA funding for early recruitment of the EMIR fee-funded posts (2 TA/AD7, 1 TA/AD5 and 1 SNE) during the preparatory period, similar to what was done for DORA.

[12] The content of this section has been updated to reflect the input to the Commission's BadgeBud system in January 2024, and further updated to reflect the position at the end of 2024. The subheadings in this section are as per the Agency Statement that is incorporated into the EU Draft Budget.

Title 1 - fees

88. Fee-funded staff costs include the cost of staff working directly and an allocation of the cost of other staff indirectly supporting fee-funded staff and activities. For fee-funded staff, the full amount of the employer's contribution to pension goes through the EBA budget and is charged with the fees.

Title 2 – EU and NCA

89. Building lease costs contractually increase every year based on French indexation (ILAT[13]). In 2024, the ILAT rate was 4.3 %. For 2026, EBA is budgeting for 2% ILAT. The French government's contribution of EUR 575,000 will be put towards the lease costs. The EBA will receive the contribution as external assigned revenue. Building running costs are being budgeted to increase at 2 % per annum.

90. The EBA lease of office space in the Europlaza building at La Défense comes to an end in May 2028. The EBA will be working on procuring the subsequent lease with the objective of accommodating the resulting costs (including those of a possible move of offices) within the existing appropriations.

91. Costs for IT hardware and software are being budgeted at a similar level to 2024. IT services cost increases are driven by the costs for the implementation of updated Commission systems for HR (SYSPER), Missions (MIPS+), Finance (SUMMA), and the new documents and records management system (EDRMS), and by increasing cyber security requirements. EBA will continue to ensure that cloud costs remain in line with projections.

92. External services, legal, and communications are expected to operate at a similar level of activity and budget as in 2024.

Title 2 – fees

93. Title 2 costs funded by fees are indirect costs driven for the most part by the number of FTE projected to work directly on fee-funded activities in 2026.

Title 3 – EU and NCA

94. 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 2025, reduced by the cost of the Joint Consumer Protection Day for which EBA was responsible in 2024.

95. Chapter 31 includes the cost of translations of guidelines, which for the EBA has always been a significant cost, and is expected to run at a similar level to 2024. 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 2026 is expected to include work on Pillar 3 data hub, data curation and remediation (for DORA), SupTech work for MiCAR, and integrated reporting.

[13] *Indice des loyers des activités tertiaires (ILAT)*

96. 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: driven by the mandates of PSD3/PSR/FIDA, continuation of Pillar 3 hub work and the enhancement and operational support of DORA and MiCAR systems. Work will also continue on identity management, replacement of EBA notification systems (eGate), transfer of EURECA to AMLA, and enhancements on workplace solutions such as the colleges platform.

Title 3 – fees

97. Title 3 costs funded by fees are primarily fee-funded direct costs (missions, meetings, IT systems maintenance). May also include consultancy and data services.

Ad hoc grants and delegation agreements

98. In 2022, the EBA signed an SLA with DG REFORM whereby the EBA provides services to the EU Supervisory Digital Finance Academy over a period of four years (mid-2022 to mid-2025) and DG REFORM funds one TA and one CA for three years, as well as other costs arising from the EBA's support to the EU SDFA. A discussion is ongoing for a follow-on agreement with DG REFORM, for an additional three years. This is expected to provide a lower level of funding than the current agreement.

SECTION III - ANNUAL WORK PROGRAMME 2026

1. OVERVIEW

99. The priorities for 2026-2028 will underpin the EBA's 2026 work programme. The fact that one task does not specifically does not imply that it will not be discharged or is less important, but simply that it is well established and requires less focus. A final work programme for 2026 will be adopted and published in September 2025.

2. THE EBA'S STRATEGIC PRIORITIES IN 2026

100. In 2026, the EBA will refer to its multi-annual priorities for 2026-28 with specific areas of focus.

Rulebook: Contributing to an efficient, resilient and sustainable single market

Risk assessment: Developing tools, data and methodologies to support effective analysis, supervision and oversight

Innovation: Enhancing technological capacity for all stakeholders

Areas of focus in 2026

Single Rulebook

- Banking package phases 2 and 3
- Payment services
- CMDI, BRRD and DGSD [TBC]
- New EC initiatives (ESIU, bank funding, simplification) [TBC]

Convergence

- Peer reviews
- Capital stack [TBC]
- Deep dives in legacy issues

Risk assessment and stress test

- Refine and enlarge to new areas (climate, NBFI) EU-wide stress test approaches
- Enrich risk analysis and outreach

Supervision and oversight

- DORA oversight
- MiCAR supervision if relevant
- EMIR IMM validation

Data, tools, and methodologies

- Adjust data to new tasks (DORA, MiCAR, EMIR)
- Advance integrated reporting

Technological capacity

- Innovation monitoring and knowledge sharing
- Roll out RegTech and SupTech
- Implementation of the AI Act

Consumer protection

- Identification of new types of fraud and mitigating actions
- Unintended consequences or impact of use of AI

3. ACTIVITIES IN 2026

101. This subsection sets out EBA's draft work programme for 2026, linking tasks to activities and priorities. Across It reflects current legislative mandates conferred to the EBA, expected ones and the current outlook: it comprises 305 deliverables (grouped in 19 activities), of which 186 are of an ongoing nature and 119 have legal deadlines. New priorities and discussions of the EC and related directions from the BoS especially in the area of simplicity and proportionality will be reflected by the time the 2026 work programme is finalised (September 2026).

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

Activity 1 – Capital, loss absorbency, and accounting

Main output	*Capital and loss absorbency* • Maintenance of the EBA Common Equity Tier 1 list and update of the CET1 report under article 80 CRR • Monitoring of CET 1, Additional Tier 1 (AT1) and Tier 2 issuances (including for ESG purposes) • *Maintenance of standardised templates on Additional Tier 1 (AT1) instruments +* • Analysis of interactions within loss absorbency requirements and stacking order, including capital buffers, including international comparisons as needed • Support on Q&A on capital and eligible liabilities instruments • *Monitor of TLAC/MREL eligible liabilities issuances under Article 80 CRR +* • Follow-up implementation of RTS on own funds and eligible liabilities *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 • Support supervisors as needed in their monitoring of modelling aspects of IFRS 9 and their related impact on capital • Monitor and promote consistent application of IFRS 9 based on past EBA recommendations in public reports • Continue working on / monitoring consolidation aspects • Monitor accounting standards and comment letters to the International Accounting Standards Board, where needed, and including input to the ongoing work on the Dynamic Risk Management project from the IASB • Monitor the impact of the changes of the interest rate environment on accounting related aspects, Support on QA on accounting and consolidation	Ongoing
	Capital and loss absorbency • Updated monitoring reports (CET1, AT1, Tier 2, TLAC/MREL) as far as needed, also depending on market developments, including where needed additional guidance on ESG capital and eligible liabilities instruments *Accounting and audit* • Report to the EU Commission on completeness and appropriateness of provisions on consolidation • *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	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 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	

Activity 2 – Liquidity, leverage, and interest rate risk

	2) Continue engagement with stakeholders on measurement and definition of supervisory metrics/tests, including on interest income in the context of the EBA heatmap on IRRBB	
Description	In the area of liquidity (also encompassing asset encumbrance-related), 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 existing regulatory products and follow up on its close scrutiny plans on the impact of the interest rates evolutions on IRRBB management and modelling underlying assumptions. In this context, the EBA will continue its reflections with stakeholders and continue to implement 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 • 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 of consistent leverage ratio implementation (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	Ongoing
	Liquidity risk • Continuous monitoring of international developments and related reflections on liquidity metrics	

Activity 2 – Liquidity, leverage, and interest rate risk

	Interest rate risk in the banking book • Continuous monitoring of international developments and related reflections on IRRBB framework and metrics. 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	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 85% 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 EBA's work on credit risk will focus on preparing the development of technical standards and GL in addition to review reports under the Banking Package. The emphasis will be the calculation of capital requirements under the standardised approach (SA) and the internal ratings-based (IRB) approach for credit risk in accordance with the EBA's Roadmap on CRR III / CRD VI [14], which sets out the sequencing of the mandates in line with the deadlines set out by the co-legislators. Focus will during 2026 to 2028 be on phase 2, 3 and 4 of the EBA roadmap on the Banking Package. 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 IRB approach could be addressed in supervisory discussions. Furthermore, industry consultations will be considered on individual products, in the form of roundtables and other industry dialogues. In addition, it will continue its monitoring efforts on credit risk related issues, in particular through the EBA benchmarking exercise of internal models. Regarding securitisation and covered bonds, the emphasis will remain on the functioning of 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	*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	Ongoing

[14] 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)

	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	
	Credit risk • 2025 benchmarking report on IRB models • GL specifying the methodology institutions shall apply to estimate IRB-CCF or delivered in 2025?	Q1
	Credit risk • *Preparation of 2027 benchmarking portfolios – update of ITS (including aspects related to IFRS 9) +* • RTS to specify the assessment methodology for compliance with the requirements to use the IRB including integrity of the assessment process and methodology for estimating PDs • RTS on the categorisation to PF, OF and CF, and the determination of IPRE • Report on the appropriate calibration of risk parameters applicable to specialised lending exposures under the IRB • Report on the recognition of capped or floored unfunded credit protection • Report on the impact of the new framework for securities financing transactions in terms of capital requirements • Guidelines on artificial cash flow and discount rate	Q2
	Credit risk • RTS on criteria for high quality project finance specialised lending exposures • RTS on how take into account the factors when assigning risk weights to specialised lending exposures *Securitisation and covered bonds* • *Monitoring report on the treatment of NPL under the Securitisation framework +* • *Monitoring report on capital treatment of STS synthetics +*	Q4
	Credit risk • *Guidelines on methods for valuation+* *Large exposures* • Report on shadow banking - depending on final CRR III provisions. *Securitisation and covered bonds* • *Monitoring report on collateralisation practices +*	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

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

Objectives	1) Deliver at least 85% 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) set out in the EU Banking Package. 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. The mandates under the EU banking package sets out the EBA priorities in the market risk, counterparty credit risk and CVA. In this context, the EBA is continuing to monitor elements relevant for the implementation, including the European Commission's decision to delay the application of FTRB own funds requirements by one year, and will react and re-prioritise relevant EBA mandates should changes be needed. The EBA work in the area of market infrastructure, in particular mandates under EMIR and CSDR, will additionally complement the work on market risk. The work on investment firms will focus on the review of the new regulatory regime for investment firms (IFD/IFR). In addition, the EBA's work in relation to operational risk focuses on the implementation of the new operational risk framework, the Standardised Measurement Approach, which is part of the EU implementation of the Basel III framework, as set out in the Banking Package. Also in the area of operational risk, more details on the priorities can be found in the roadmap on the banking package.[15]	
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 consequences of the Commission postponement of 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 • 2025 benchmarking report on market risk models *Operational risk* • RTS on the exclusion of losses	Q1

[15] 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

	Market risk • *Preparation of the 2027 benchmarking portfolios – update of ITS +* *Operational risk* • Guidelines on governance arrangements to maintain the loss data set • RTS on the adjustments to the loss dataset • RTS on the risk management framework	Q2
	Market risk - Report on haircut floors for SFTs	Q4
	Market risk • Assessment of initial margin models under EMIR, including revision of RTS on initial margin model validation and GL on application and authorisation process • RTS on the materiality of extensions and changes for the SA-CVA - CP • RTS on assessment methodology for the SA-CVA - CP • RTS on further technical elements for regulatory CVA - CP • RTS on assessment methodology for the FRTB-SA - CP *Investment firms* • Supervision practices for investment firms *Market infrastructures (CSDR-related mandates)* • *RTS for Measurement and reporting of Credit and Liquidity Risks +* • *RTS on rules and procedures on conflict of interests +* • *RTS on thresholds for provision of banking-type ancillary services +* • *Report on provisioning of banking-type ancillary services for CSDs +*	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 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 85% 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		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 third- country branches (TCB) regime, ensuring for this latter timely developments of the standards focusing on authorisation. Also in light of the CRD VI, the EBA will update the SREP GLs to ensure more articulated and proportional consideration of ESG and ICT risks (with alignment to DORA framework), further clarifications related to IRRBB and CSRBB, possible update of the market risk section in view

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

	of FRTB, better coordination with the recovery plan. Efforts towards streamlining of the Guidelines and greater focus towards supervisory effectiveness will be made. The work will be carried out in accordance with the EBA's Roadmap on CRR III / CRD VI[16] setting out the sequencing of the mandates in line with the deadlines set out by the co-legislators. The EBA will also continue promoting convergence in supervisory practices through the different tools available. In particular, the EBA will be monitoring the regulatory perimeter and authorisation practices and the establishment of third-country branches and the Intermediate Parent Undertaking (IPU) framework. In the area of governance and remuneration, the EBA will also continue to monitor and benchmark remuneration trends and diversity practices at EU level. The EBA will also continue to set yearly supervisory priorities in the context of the European Supervisory Examination Program (ESEP) and will be monitoring its implementation, also through the EBA participation in supervisory colleges.	
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) • Monitoring of supervisory colleges	Ongoing
	Third country branches • Guidelines on SREP for third country branches (TCB) • Guidelines on mechanisms for cooperation and information exchange between competent authorities, FIUs and AML/CFT supervisors for third country branches • Guidelines on authorisation of TCBs *Governance and remuneration* • Guidelines to define how to carry out enhanced dialogue to address suitability concerns • Update of Joint EBA ESMA GLs on the assessment of the suitability of members of the MB taking into account the changes introduced regarding assessment of MB and key function holders (KFH) both by institutions and CAs (91(10) and 91a(4) CRD VI) • RTS on information and documentation to be submitted to CAs 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 CRD • Review of GL on outsourcing - after DORA RTS on TPP and Subservice provision • Review of the GL on the Supervisory Review and Evaluation Process	Q1

[16] 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

	Governance and remuneration • Review GL on internal governance CRD6 - to include ESG risks, internal control functions independence from operational functions, the overall responsibility of MB as a collegial body • RTS on 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 *Third country branches* • Guidelines on internal governance of third country branches (TCB) • RTS on mechanisms of cooperation and functioning of supervisory colleges for third country branches • Guidelines on mechanisms for cooperation and information exchange between competent authorities, FIUs and AML/CFT supervisors for third country branches. *Supervisory tools* • ITS on cooperation between CAs for acquisition of material holdings	Q2
	SREP and supervisory convergence • Report on Convergence of Supervisory Practice and on colleges in 2025 (including European Supervisory Examination Programme) • Priorities for 2027 European Supervisory Examination Programme	Q3

+ 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, including work to increase the usability and flexibility of resolution plans and the effective interaction within resolution colleges. In this context consideration will also be given to earlier recommendations of the ACP on proportionality, in particular related to the resolvability assessment process and the update of the resolution plans. 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 also start any preparatory work needed for delivering on the mandate that the review of the EU's crisis management and deposit insurance (CMDI) framework will bring. 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.	

Activity 6 – Recovery and resolution

	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 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 also in the context of colleges, with due consideration of proportionality as suggested by the ACP related to the update, review and standardisation of the resolution planning.	
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 • Monitoring of resolution colleges • Q&A on BRRD-related issues • Monitoring of MREL • Preparatory work for crisis management exercise	Ongoing
	• Review of the RTS on Resolution planning ? • GL for Recovery plan dry-runs (own initiative) ? • Review of the RTS on resolution colleges • MREL impact assessment Report	Q1
	• Report on European Resolution Examination Programme (EREP) 2025 • Priorities for 2027 European Resolution Examination Programme	Q3

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 the EBA Roadmap on sustainable finance 3) Monitor ESG risks across the EU banking sector	
Description	The EBA will continue to deliver on mandates included in the EU regulations and directives and any further requests, 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 pay particular attention to maintaining the principle of proportionality when delivering these mandates, taking into considerations the recommendations of the ACP, and adjusting to new EC directions as necessary. Increasingly, the activity will also focus on embedding ESG in all regulatory work, whether in the context of new mandates or for the review of existing guidelines or technical standards (e.g. the review of SREP GL, review of GL on internal governance, review of GL on PD and LGD estimation) by contributing and supporting other activities. It is expected that the focus of the activity will be rebalanced towards increased risk monitoring and assessment. The EBA will continue building and implementing 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, including based on indicators recently introduced in the rulebook. Further involvement in stress test activities on climate is also expected.	

Activity 7 – ESG in supervision and regulation

Main output	• Fulfil the sustainable finance-related mandates received in EU regulations/directives, including by providing inputs to the ongoing work in the areas of disclosures, supervisory reporting, stress testing, risk management, supervision, internal governance, credit risk • Provide responses to the Commission's requests to provide reports and advice on sustainable finance-related topics • Support the implementation of requirements, (Including through Q&As on ESG issues • Maintaining and further developing 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 2026	Q3
	• Joint RTS on ESG rating disclosures – possible mandate from the new ESG Ratings Regulation • Possible further mandates from the review of SFDR	TBC

Activity 8 – Innovation monitoring and knowledge sharing, ICT policy and operational resilience

Contributing to priority	P2 P3 Lead Directorate: Innovation, Conduct and Consumers (ICC) Lead unit: DF
Objectives	1) Monitor financial innovation and identify areas where regulatory or supervisory response might be needed in order to contribute to common supervisory and regulatory approach fostering financial stability and consumer protection and providing advice to the co-legislators as appropriate. 2) Support the application and implementation of ICT policy and operational resilience work, including DORA, and execution of operational tasks conferred by DORA in area of incident reporting and financial cross-sector exercises
Description	The EBA will continue to monitor financial innovation, engage with industry, competent authorities and other stakeholders to identify emerging risks and opportunities from innovative applications for the industry, supervisors, the EBA and consumers and areas where further regulatory or supervisory response may be needed in order to promote consistency in regulatory and supervisory expectations. The EBA will conduct research and issue thematic publications to build knowledge, promote convergence, and identify regulatory or supervisory 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). This work, including RegTech and SupTech will also benefit NCAs' and the EBA's own use of SupTech tools to facilitate oversight and supervision task. To strengthen supervisory capacity in innovative digital finance, the EBA together with ESMA and EIOPA in partnership with the European Commission will continue to contribute to the activities of EU Supervisory Digital Finance Academy (SDFA) – given the decision to prolong this initiative until 2028.

Activity 8 – Innovation monitoring and knowledge sharing, ICT policy and operational resilience

Main output	*Innovation monitoring and knowledge sharing* • Contribute to and foster common regulatory/supervisory approaches in digital finance topics through innovation monitoring and knowledge-sharing and awareness raising activities with EU and national competent authorities via the EBA FinTech Knowledge Hub (workshops, roundtables, seminars) and the EFIF • Continue to contribute technical inputs as appropriate to EU initiatives in the areas of digital finance, including the digital Euro, and MiCAR (Article 140) • Facilitate the implementation of the AI Act in the EU banking and payments sector, in particular by issuing as appropriate guidance (e.g. in the form of Opinions or Guidelines) to address the intersection between AI Act and sectoral requirements • Facilitate knowledge exchange on Generative AI use in the EU banking and payments sector and to identify opportunities, risks and any appropriate regulatory and supervisory actions • Identify SupTech tools that could facilitate oversight and supervision tasks, with a particular focus on tools with potential common interest among the EBA and NCAs. • Activities based on work program of the EFIF, including chairing of the forum in 2026 • Activities related to the SDFA *ICT policy and operational resilience* • Operation and maintenance of EU-SCICF • Assessing reported major ICT incidents • Annual report on major ICT- related incidents • Issuance of warnings and high-level statistics, as appropriate, to support ICT threat and vulnerability assessments • Supervisory convergence work on the implementation and application of DORA and related ICT policy and operational resilience work	Ongoing
	• Follow-up work on identified priorities on innovative applications in the areas of (i) crypto, tokenisation in relation to financial products and services and decentralised finance (DeFi), (ii) AI/ML use cases in the financial sector, (iii) value chain developments (such as 'white labelling'), including the preparation of EBA opinions and reports as appropriate (including to clarify supervisory expectations, where deemed necessary), (iv) legislative initiatives, inc. re digital euro and (v) and communications for consumers as appropriate ++	TBC

++ The area and the scope of the work will be determinded later in the year

Activity 9 – Payment services, consumer and depositor protection

Contributing to priority	P1 P3	Lead Directorate: Innovation, Conduct and Consumers (ICC) Lead unit: COPAC
Objectives	1) In the area of payment services, contribute to efficient, competitive, secure and easy-to-use payment services across the EU, by continuing to bring about a common interpretation and supervision of payments-related EU Directives and Regulations, including PSD2, EMD,	

Activity 9 – Payment services, consumer and depositor protection

	PSD3, PSR, IcFR, IPR, and the SEPA Regulation, and by strategically monitoring the payments market with a view to identify and realise efficiencies for the EBA, NCAs and the industry. 2) In the area of consumer protection, foster a consistent and high level of consumer protection across the EU by identifying and addressing consumer detriment in the retail banking sector, monitoring and assessing the retail conduct of financial institutions, and delivering mandates conferred on the EBA Regulation and sectoral EU law 3) Contribute to depositor protection in the event of a bank failure, facilitate cross-border cooperation between deposit guarantee schemes (DGSs), act as a hub for DGS data collection and analysis, and monitor the financing and resilience of DGSs	
Description	With regard to payment services, the EBA will focus on delivering an estimated 35 mandates conferred on the EBA in the forthcoming revised Payment Services Directive (PSD3), Payment Services Regulation (PSR), and the Financial Data Information Act (FIDA). When developing these mandates, the EBA will consider ACP recommendations to the EBA related to the prevention of payment fraud. With regard to consumer protection, the EBA will publish its biennial Consumer Trends Report, carry out resultant follow-up actions, assess and update the EBA's retail risk indicators, coordinate national education initiatives by delivering education workshops for NCAs and regularly updating the EBA/JC education repositories, and fulfill other mandates conferred under sectoral EU law and the EBA Regulation. With regard to depositor protection, the EBA is ready to start work on delivering an estimated 11 mandates conferred on the EBA in the forthcoming the revised Deposit Guarantee Schemes Directive (DGSD) as soon as the CMDI negotiations have sufficiently progressed. Furthermore, the EBA will publish annual data on covered deposits, and the finding level of DGSs.	
Main outputs	*Payment Services* • Answer Q&As received on PSD2, EMD, PSD3, PSR, IcFR, IPR and SEPA Regulation through the EBA Q&A tool	Ongoing
	Payment Services • Deliver an estimated 17 mandates & tasks to be conferred on the EBA under the new Payment Services Regulation (PSR), incl. on payment security, payment fraud, access to payment accounts, consumer awareness, complaints procedures, monitoring of the AIS and PIS market, limited network exclusions, sanctions, and temporary product intervention • Deliver an estimated 5 mandates & tasks to be conferred on the EBA under the under the new Financial Information Data Access Act (FIDA), incl. on the use of consumer data, the authorisation of financial information service providers, the functioning of financial data sharing schemes, a central register, and the settlement of disagreements between NCAs • Deliver an estimated 12 mandates to be conferred under PSD3, incl. on authorisation, safeguarding, calculation of own funds, passporting, governance and control mechanisms, and central registers. *Depositor protection:* • RTS on Information sheet from credit institutions to consumers • RTS on Information sheet from DGSs to consumers • RTS on Client funds – criteria for assessing contagion	Q2

Activity 9 – Payment services, consumer and depositor protection

	• RTS on Methodology for performing the least cost test to determine how much DGS funds can be used in failure prevention • 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) • Publish 2025 data on the uses of DGS funds, including on bank failures, and data on covered deposits and financial means available to DGSs?	
	Payment Services • Publish the 2026 edition of EBA/ECB Report on payment fraud data? *Depositor protection* • Guidelines on Reporting to the EBA of various pieces of information, such as triggering of unavailability of deposits, uses of DGS funds	Q3
	Consumer protection • Update for 2026 of EBA Retail Risk indicators and incorporation into EBA Risk Assessment Report (RAR) • Follow-up work on issues identified in the Consumer Trends Report 2024/25 published in Q1 of 2025 • Guidelines on financial inclusion and the Digital Euro under the forthcoming Act	Q4

3.2. Risk assessment and data

Activity 10 – Oversight and supervision activities

10a – DORA oversight

Contributing to priority	P2 — Lead Directorate: DORA Joint Oversight Directorate	
Objectives	Execution of oversight over CTPPs	
Description	In accordance with DORA the ESAs will carry out oversight of CTPPs with the objective of the assessment of whether CTPPs have in place comprehensive, sound and effective governance, procedures and arrangements to manage ICT risks, which may be posed to the EU financial entities. The oversight activities will cover designation of CTPPs, followed by risk assessment and oversight planning, and other specific activities over CTPPs, such as information gathering, on-site inspections and off-site investigations, issuance of recommendations and follow-up activities.	
Main output	• Carrying out DORA oversight activities	Ongoing

10b – MiCAR supervision

Contributing to priority	P2 — Lead Directorate: Innovation, Conduct and Consumers (ICC) Lead unit: DF
Objectives	1) Execution of supervision of issuers of significant asset-referenced tokens (ARTs) and e-money tokens (EMTs)

	2) Support the application and implementation of MiCAR and execution of the other tasks conferred under MiCAR, including preparing at the request of NCAs non-binding opinions on the regulatory classification of crypto assets, and exercising intervention powers	
Description	In accordance with MiCAR the EBA will carry out significance assessment of issuers of ART/EMT and, if applicable, supervise the issuers of significant asset-referenced tokens (ARTs) and e-money tokens (EMTs). In addition to the direct supervisory powers, the EBA will perform other tasks such as issuing opinions, at the request of NCAs, on the regulatory classification of crypto-assets, and can exercise intervention powers with regard to asset-referenced and e-money tokens in specific cases. The EBA, and where applicable together with the other ESAs, will carry out supervisory convergence work to support the application and implementation of DORA and related ICT policy and operational resilience work, and will perform other tasks conferred by DORA in area of incident reporting and financial cross-sector exercises.	
Main output	*MiCAR supervision and supervisory convergence* • Monitor crypto-asset markets, including ART and EMT, and developments and assisting EC for any follow up work related to MiCAR review • Provide Opinions on classification of crypto-assets • Exercise, as appropriate, intervention powers • Supervisory convergence work on the implementation and application of MiCAR, including promoting convergence of authorisation and supervision practices through a Crypto Asset Standing Committee • Significance assessment of issuers of ART/EMT and, if applicable, carrying out MiCAR supervisory activities in accordance with the supervision plan	Ongoing

10c – EMIR validation of certain IMM

Contributing to priority	P2	Lead Directorate: Prudential Regulation and Supervisory Policy (PRSP) Lead unit: RBM
Objectives	Set-up of framework for and execution of validation of industry-wide initial margin models under EMIR	
Description	Under EMIR 3.0, the EBA is becoming the central validation hub for initial margin models. This entails that EBA will review the changes of certain IMM (Initial Margin Model) and coordinate globally and with EU national competent authorities on model changes.	
Main output	• Develop internal supervision guidance and supervisory tools • Approve changes to certain IMM • Coordinate with EU and non-EU competent authorities on changes to certain IMM • Monitor developments in derivatives markets	Ongoing

Activity 11 – Reporting and transparency framework

Contributing to priority	All	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	

Activity 11 – Reporting and transparency framework

Description	The EBA will continue the work 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. The EBA will also continue to support stakeholders in the reporting process by addressing questions through the Q&A process. The EBA will work to improve the comparability and consistency of Pillar 3 disclosures, promoting market discipline by maintaining a high-quality Pillar 3 framework for prudential disclosures, in alignment with international standards, and the Pillar 3 Data Hub (P3DH) that will centralise Pillar 3 disclosures for all EU institutions. As part of this the EBA will promote integration of Pillar 3 and reporting frameworks. Work on integrated reporting will continue 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. Under the Joint Bank Reporting Committee (JBRC), 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). To facilitate all this work, the EBA will keep progressing towards automatisation and digitalisation by improving the relevant tools, including our DPM 2.0, the DPM studio tool, and sign-posting tool on reporting and disclosure obligations. Last but not least, the EBA work on reporting and Pillar 3 will continue to be guided by the principle of proportionality, in line with the recommendations of the study of the cost of compliance and the recommendations of the ACP, and the objective of maximum harmonisation of the regulatory reporting requirements under the EBA remit. ..	
Main output	• Regular update and maintenance of the supervisory and resolution reporting framework (legal act, templates, instructions and technical package) • Regular update and maintenance of the Pillar 3 framework (legal act, templates, instructions and technical package) • Maintain validation rules, the data point model and XBRL taxonomies • Continue with the development and maintenance of the modelling tool, DPM Studio and of the data dictionary, including data-modelling, validations, transformations and data exchange formats creation. Enhance the DPM studio tool to allow for machine readable instructions • Implementation and maintenance of an integrated reporting system in the context of the Joint Bank Reporting Committee • Contribute to implementation of EU Supervisory Data Strategy across financial sectors • Maintain mapping tool between reporting and Pillar 3 • Enhancement and maintenance of sign-posting tool on reporting and disclosure obligations • Opinions on sustainability reporting standards issued by EFRAG under CSRD • Maintenance of the Pillar 3 data hub • Work on European single access point (ESAP), in coordination with ESMA and EIOPA • *Monitoring of Pillar 3 disclosures +* [17] • Support Q&A process on reporting and transparency frameworks	Ongoing

[17] Own initiative project.

Activity 11 – Reporting and transparency framework

	• Continue involvement in EU and international organisations on disclosure and reporting including EFRAG non-financial reporting body and BCBS DIS (Disclosure Expert Group)	
	• ITS to establish common procedures, forms and templates for the consultation process between the competent authorities in case of mergers	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 the high amount of regulatory and other mandates. Tasks may be postponed, cancelled or undertaken with less intensive resource input.

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. This includes both regular internal updates to EBA governing bodies and externally through various types of reports. The EBA will also explore the use of new technologies/AI tools in the use of data and risk analysis work. This includes both regular internal updates to EBA governing bodies and externally through various types of reports. Finally, the EBA will support the implementation of the macroprudential framework in the EU.	
Main output	• Regular work on risk analysis of the EU banking sector, including identification of potential risks and vulnerabilities, risk updates to EBA governing bodies and sub-structures, contribution to the quarterly EU risk dashboard • Internal updates on liquidity and market developments for the BoS and other interested parties of the EBA Governance • Risk discussions at the BoS, BSG, SUPRISC and other bodies of the EBA governance • Work on macroprudential matters (including updates to the O-SIIs list) • Opinions on macroprudential measures (Article 124, 164 and 458 CRR) and systemic risk buffers) • Review of the Guidelines on sectoral systemic risk buffers to address climate risk • Draft RTS to specify the types of factors to be considered for the assessment of the appropriateness of the risk weights (Article 124 CRR) • Thematic and topical notes on various risks • Contribution to ESRB work	Ongoing
	• JC spring risk report • Risk Assessment Questionnaires (Spring 2026) • Risk assessment report (RAR) of the European banking system (semi-annual), including information on funding plans and asset encumbrance (previously covered in separate reports)	Q2
	• JC autumn update on risks and vulnerabilities	Q3

Activity 12 – Risk analysis

	• Risk assessment report (RAR) of the European banking system (semi-annual) • Risk assessment questionnaires (Autumn 2026)	Q4

Activity 13 – Stress testing

Contributing to priority	P2	Lead Directorate: Economic and Risk Analysis (ERA) Lead unit: RAST
Objectives	Development /improvement of stress test exercise – including future of stress tests (i.e. incorporation of additional top-down elements), climate stress-test and consideration of the inclusion of climate stress test as part of the regular stress test exercise. As part of the work on climate, the EBA will also work on possible resilience exercises based on climate scenario analysis.	
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, like the centralisation of NII. This will be in addition to the introduction in the 2023 EU-wide stress test of top-down elements for Net Fee and Commission Income (NFCI). For the NII, the EBA will introduce a platform that will facilitate the production of banks NII projections in the 2025 exercise. The EBA will continue working on environmental stress test, including the development of regular climate stress tests according to the EBA Founding Regulation and the finalisation of Guidelines on climate scenario analysis. 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 • Consideration of environmental risk in the stress test framework and additional climate resilience scenario analysis • Design and implementation of internal top-down stress test capacity	Ongoing
	• 2027 EU-wide stress test exercise (incl. hybrid work – work on the stress test methodology in 2026	Q3

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) Produce high quality research and technical analysis to improve the analytical quality of EBA outputs (reports and standards, infrastructure for risk analysis, non-bank financial	

Activity 14 – Regulatory impact assessments

	institution analysis, top-down stress testing, supervision of ARTs and TPPs, as well as supervisory reporting) 3) Run the annual mandatory QIS data collection and the Basel III monitoring exercise for the transitionary effects of the CRR3/CRD6 implementation period. 4) Run the Supervisory Benchmarking exercise with its annual credit and market risk data collections and reports	
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, NBFI, 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 will become less burdensome with the implementation of the Basel III in the EU as of 1 January 2025. At the same time, the QIS exercise will continue for annual data collections and analysis and frequent interaction with banks, NCAs and the BCBS community. From 2025, the data collection regarding Basel implementation Monitoring will move to COREP and the report will be transformed to a dashboard. The QIS exercise will remain open for data collection from non BCBS countries and for the purposes of data collections for various regulatory mandates and reports. As part of the economic analysis work the EBA carries out its research function, which includes organising workshops, seminars and managing the EBA staff paper series. It furthermore actively contributes to the methodology development across the business areas, including stress testing models, risk analysis, ESG tools, and models for resolution.	
Main output	*Impact assessments:* • Impact assessment reports that accompany development of EBA's proposals for regulatory products (RTS and ITS), guidelines, calls for advice and possibly recommendations (covering activities 1 to 11) • Specific calls for advice requiring advanced economic and/or econometric analysis • 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 • Contribution to the Task Force of Impact Studies and Advisory Committee on Proportionality, to run the Subgroup of Supervisory Benchmarking *Economic analysis:* • Analysis and research to support and continuously enhance regular EBA economic and statistical methodology and analysis • Dedicated calls for advice with significant data- or research contribution • Develop economic and statistical tools and models for new functions (such as stress testing, ESG, non-banks and digital finance)	Ongoing

Activity 14 – Regulatory impact assessments

	• Thematic notes on risk analysis and other larger regulatory initiatives, as part of Risk Assessment Reports • Publication of EBA staff papers • Contribution to work on ESG factors, financial innovation, payments, digital finance • Contribution to the top-down stress test framework • Organisation of and participation in academic seminars and research workshops or initiatives which benefit the quality of work in EBA products • Supervisory benchmarking exercise, revision of the data collection in the context of CRR III/ COREP stages I and II and refocusing the analysis	
	Impact assessment • CRR II / CRD V and CRR III / CRD VI / Basel III monitoring report (annual report)	Q3
	Reports and specific analysis • Annual report on the impact and phase in of the LCR (to be provided as part of RAR in 2026) • Annual report on the impact and phase in of the NSFR (to be provided as part of RAR in 2026) • Annual QIS data collection and Basel III monitoring dashboard *Economic analysis:* • Policy research workshop • EBA Staff Papers editorial board	Q4

Activity 15 – Data infrastructure and services, statistical tools

Contributing to priority	All — 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, analysis and timely dissemination 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
Description	Data is an essential cornerstone that enables the EBA to deliver on its mandates. 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. The development, production and dissemination of data assets by the EBA is governed by core principles - impartiality, objectivity, professional independence, reliability, statistical confidentiality, cost effectiveness - consistently with the statistical principles of Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics. As part of its data strategy, the EBA capitalises 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 allows more proportionality in the EBA's work, resulting in more comprehensive analyses, better impact assessments and reduced burden for banks and competent authorities by maximising already reported supervisory data.

Activity 15 – Data infrastructure and services, statistical tools

	EUCLID supports the implementation of the EBA's data strategy, providing access, via a dissemination portal (EDAP), to high-quality data and insights to internal and external stakeholders, by employing more advanced technical capabilities. It provides analytical tools for risk analysis and develop and maintain its risk dashboards and risk indicators, in accordance with art. 22 of EBA's Founding regulation. New tasks and mandates (DORA, MiCAR, EMIR3…) require additional statistical support, and the EBA will need to adjust its data management processes and tools. With a view to optimise processes and resources and redeploy resources to data management tasks related to new mandates, the EBA aims to streamline and possibly reprioritise recurrent data collections (e.g QIS) as much as possible, while limiting resource intensive ad-hoc data collections (e.g. CfAs).	
Main output	• Support and maintain the EBA's data infrastructure: master data and fact data for supervisory, resolution, IFs, payments, DORA and MiCAR; setting reporting requirements; monitoring submissions; implementing validation rules and quality checks for statistical analysis; managing the data workflow and interacting with the CAs to ensure smooth data flow and quality; supporting business functions' work with quantitative analysis and analytical tools; developing interactive and user-friendly visualisation tools for data dissemination. • Improve Transparency in the banking sector through the re-use of supervisory information and the pre-population of templates • *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 +* • *Train CA and EBA users on data and analysis 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 +*	Ongoing
	• Dashboards and other tools for internal and external data users • Bank-specific dashboards for colleges	Quarterly
	• 2026 EU-wide Transparency exercise • Supervisory disclosure exercises (CRD / IFD)	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	

Activity 16 – EBA governance, international affairs, communication

<table>
<tr><td></td><td colspan="2">2) Handle the EBA's communication needs and training programme offered to CAs

3) Manage the EBA engagement with EU and non-EU stakeholders and execute the EBAs' equivalence assessment programme</td></tr>
<tr><td>Description</td><td colspan="2">The activity supports the EBA's governing bodies (BoS and MB), the Banking Stakeholder Group, the Advisory Committee on Proportionality, the ESAs' JC and Board of Appeal; and the EBA's interactions with the EU and international institutions (e.g. GHOS/BCBS, IMF). This support will expand to new areas in relation with EBA's evolving activities, such as DORA oversight forum, CASC support, coordination with AMLA.

It furthermore contributes to the planning of the EBA priorities, the establishment of the EBA's work programme and the monitoring of its execution.

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 non-prudential areas.

The engagement with EU and non-EU stakeholders, for both private and public sectors, is managed within this activity, under the steer of Senior Management and in coordination with all EBA Departments.

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.</td></tr>
<tr><td rowspan="3">Main output</td><td>• 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 and oversight of the EBA's standing committees and their substructures
• Support the EBA's contribution to EU and international fora
• Develop internal policies/processes to support the EBA's activities
• Ensure external and internal communication
• Development and execution of the Union Strategic Supervisory Priorities 2024-2026
• Prepare and monitor the execution of the annual and multi-annual work programme
• Manage the stakeholder engagement with EU and non-EU stakeholders
• Organise or participate in dialogues and exchanges with relevant authorities in in EU and non-EU jurisdictions
• Deliver physical and online 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</td><td>Ongoing</td></tr>
<tr><td>• Draft Single programming document (2027-2029 horizon)</td><td>Q1</td></tr>
<tr><td>• Annual report 2025 (and Consolidated annual activity report)
• JC Annual report 2025</td><td>Q2</td></tr>
</table>

Activity 16 – EBA governance, international affairs, communication

	• Work programme 2027 • JC Work programme 2027 • Opinion on EP 2024 discharge report	Q3

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 through supporting oversight function under DORA and direct supervision under MiCAR and a review and investigation function carrying out peer reviews, investigating potential breaches of Union law, settling disagreements between CAs, fostering and monitoring supervisory independence and conducting investigations /enforcement under MiCAR 3) Support answering of Q&As, ensuring Q&As are answered within 9 months by providing an enhanced interactive single rulebook, effective workflow system and regular management reporting and escalation 4) Adapt institutional advice and compliance functions to ensure effective support for new EBA activities, in particular oversight and direct supervision activities.	
Description	The overall aim of the legal and compliance activity is to ensure that the EBA operates in accordance with its founding regulation and with all other applicable laws. Legal advice work on sectoral files including CRD/CRR, DORA/MiCAR, revised payment services, crisis management, markets infrastructure and deposit guarantee regulation will remain substantial. Work on supervisory convergence and enforcement topics including peer reviews (see work plan in annex XIV), Q&As, mediation, breach of Union law investigations, supervisory independence and conducting investigations/enforcement under MiCAR/DORA is expected to increase significantly which will require careful consideration of the peer review work plan. Oversight and direct supervision activities will lead to new types of legal work supporting the development of supervisory assessments, decisions and opinions. Risk and compliance functions and policies will need to adapt to reflect the EBA's new activities as they enter business as usual, with institutional advice, including governance and litigation support, and data protection work increasing to support these activities as they grow. The EBA will continue to operate and enhance its risk and compliance functions, finalise CRD guidelines on supervisory independence, enhance the Q&A process and Interactive Single Rulebook; and support sound implementation of MiCAR, DORA and EMIR validation of certain IMM.	

Activity 17 – Legal and compliance

Main output	• Legal advice on regulatory, supervisory convergence, oversight and direct supervision topics and on institutional matters • Conduct of investigations for supervisory/enforcement decisions under MiCAR • Identification and investigation of potential breaches of EU law • Settlement of disagreements between CAs • Monitor and foster supervisory independence of CAs, including developing and commencing ESAs assessment exercise on elements of joint criteria on supervisory independence • Q&A: coordinate the internal preparation by the policy areas of the answers to external stakeholders on the Single Rulebook • Interactive Single Rulebook on the EBA website • Advice on third country equivalence • Representation of 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	Ongoing
	• Peer review 1/25 – Pillar 3 transparency • Follow-up peer review – Treatment of mortgage borrowers in arrears • GL on the prevention of conflicts of interests in and independence of competent authorities • Peer review work plan	Q2
	• ESAs supervisory independence exercise	Q3
	• Follow-up peer review – Definition of default	Q4
	• Peer review - 1/26 & 2/26	TBC

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 voted annual budget and carried forward appropriations 2) Achieve at least 95% of the Establishment Plan 3) Achieve at least 90 % execution of the Procurement plan 4) Ensure input of the 2027 budget request to the Commission by 31 January 2026 5) Ensure adoption of the 2027 annual budget before 2026 year-end (subject to timely adoption of the EU general budget by the Budgetary authority)
Description		For HR, the focal point is to carry on with the implementation of the EBA Horizon 2029 Talent Strategy that is based on the three below components with an interplay of three strategic pillars (1) Fostering talent management (2) Excelling Leadership Management (3) Maximising HR Management. The EBA HR vision is targeting the following components: The HR Infrastructure (the foundations): (1) Complying with all rules; (2) Having the right sensors; (3) Optimising the HR function.

	The “R” of HR (the organisation’s perspective): (4) Attracting staff; (5) Managing staff; (6) deploying staff; (7) Assessing staff. Th “H” of HR (the staff’s perspective): (8) Talent development; (9) Talent engagement; (10 Talent care. The primary activity of Finance will continue to be the assurance of adequate, legal and regular budget execution, and timely acquisition of future years’ budgets. In addition, it will continue the implementation of the systems and processes required to support fee-financing arising from DORA, MiCAR and EMIR 3.0, in coordination with ESMA and EIOPA. The Finance team will also begin work on implementing SUMMA, the Commission’s successor to the current ABAC budget and accounting system, with which EBA must go live on 1 January 2027. Procurement will focus on achieving the Procurement plan while ensuring full compliance with the financial regulation. Work will continue on training colleagues on the procurement process and on contract management.	
Main output	*HR* • Maximised execution of the Establishment Plan (at least 95%) • Ensured compliance to the SR/CEOS with Implementing Rules’ adoption (Article 110 of the SR) • Optimised talent identification, attraction and acquisition approach • Revamped talent career development framework • Increased HR digitalisation (SYSPER deployment) *Finance* • Execution of the 2026 annual budget • Establishment and acquisition of the 2027 budget • Establishment of the 2028 budget • Implementation of the 2026 procurement plan • Production of the 2025 annual accounts • Implementation of the Commission’s SUMMA system (successor to the current ABAC accounting and budget system), to go live on 1 January 2027 • 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) Implement IT Strategy 2026-2030 cycle in continuation of current IT Strategy 2) Staggered delivery across 2025/2026 of DORA, MiCAR and Pillar3 DataHub capabilities 3) Staggered delivery from 2026 onwards on PSD3, PSR and FIDA capabilities 4) Coordinate and monitor all the tasks associated with the expiry of the rental contract 5) Improve environmental performance and reduce carbon footprint	
Description	The EBA is launching in 2025 a new IT strategy for 2026-2030. The EBA IT will continue and mature its digital capabilities (digital workplace, digital infrastructure, big data platforms, AI, cyber defences) to provide secure business solutions and close partner support for EBA to	

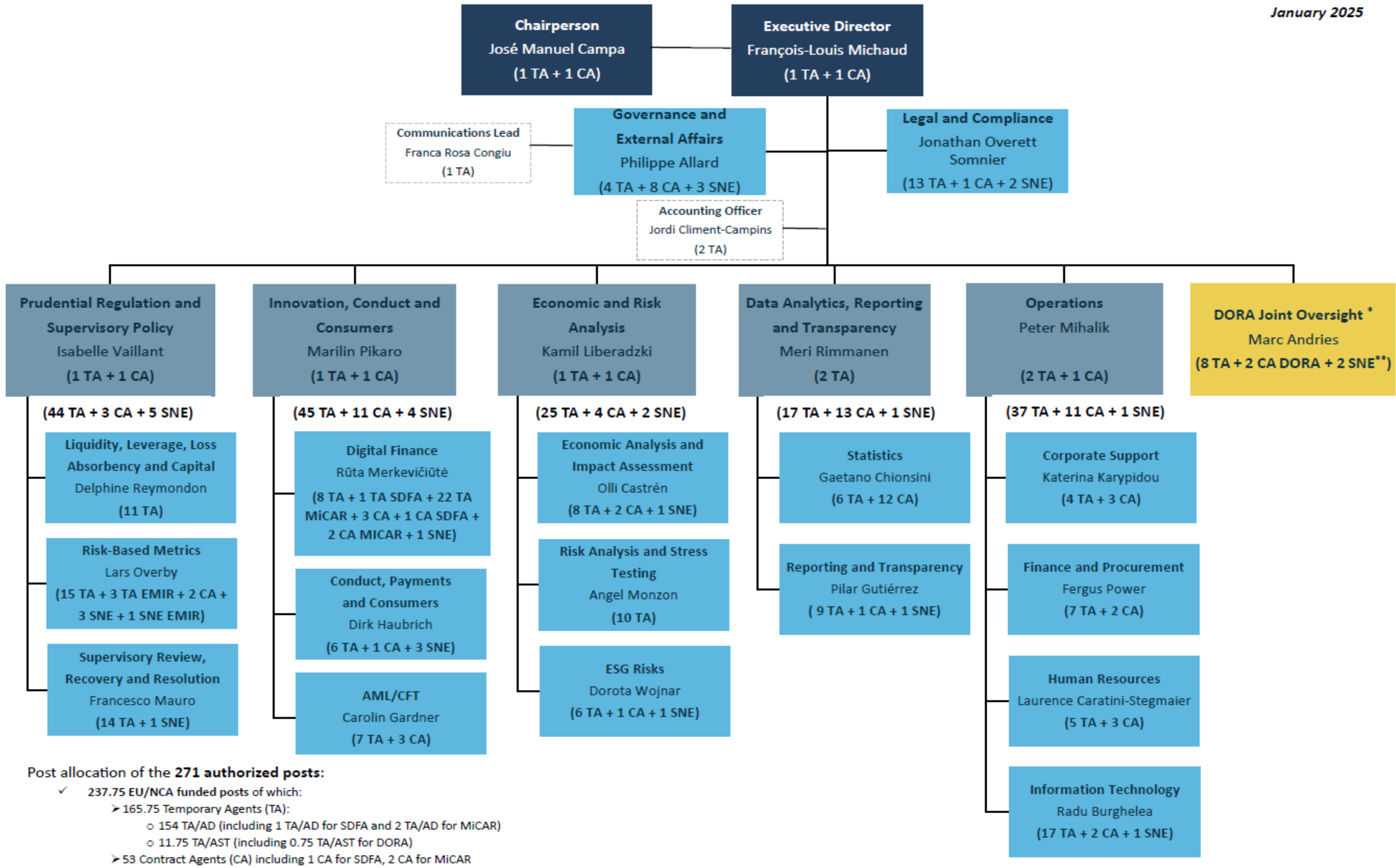
Activity 19 – Infrastructures (Information technology and Corporate Support)

	continue its Data Strategy (EBA Data Hub), to fulfil new mandates (DORA, MiCAR,PSD3, PSR,FIDA) and to adequately protect EBA data and staff. In 2025/2026 EBA will finalize a new generation of its core data platform for collections (EUCLID 2.0), which will go in full operations from 2026. This includes new capabilities for data modelling, new file formats, cloud data pipelines for processing, efficient calculation and validation capabilities. Enriching and developing the EBA Data Access Portal with more data products for dissemination, including migrating across existing data products. Staggered delivery across 2025/2026 of capabilities for DORA (CTPP register, Incident Reporting, Oversight), MiCAR and Pillar3 DataHub projects. From 2026 onwards gradual implementation of additional capabilities driven by the PSD3, PSR, FIDA and EMIR requirements for the validation of certain Initial margin models (IMM). Implementation of Cybersecurity work program stemming from the Cyber Regulation. Supporting adoption of new technologies, including the new Big Data platform already introduced in 2024, and new AI based technologies and capabilities. Continued delivery of the EBA's programs for HR digitalisation and modernisation of EBA Identity and Access Management enterprise capabilities for heightened automation and security. Finalise transfer of existing EBA AML Platform (EuReCa) and/or services to AMLA. Corporate Support supports the operational work of the Agency enhancing its ability to function as a best practice, knowledge-based, lean and service-oriented public body as well as to create and sustain a flexible, sustainable and inclusive working environment. Its core tasks include a range of activities supporting the Agency's operations, such as building projects and services, events management, management of meeting facilities, canteen and catering services, missions and reimbursements, EMAS and sustainability, physical security and business continuity, asset management and furniture, health and safety and ergonomics, Internal Controls.	
Main output	*IT* • Implement the EBA's IT strategy for 2026-2030 (to be developed in 2025) • Staggered delivery of enhancements and additional data collection and dissemination products driven by PSD3, PSR and FIDA regulation • Master and reporting data collection via EUCLID (including supervisory, resolution, investment firms (IFs), DORA, MiCAR, Pillar 3 disclosures) • Enhancement and support of EBA Data Access Portal for EBA to publish and disseminate submitted data and own data products, in close collaboration with NCAs and submitters • Enhancement and support of DPM Studio to meet the needs of the EBA reporting frameworks • Hypercare support for EuReCa following 2025 transfer to AMLA • Introduce, promote the use of AI based technologies, with the aim to enhance operational efficiency and productivity. Gradual implementation of targeted use cases • Support and enhance collaboration tools within EBA and external stakeholders • Staggered migration of EBA internal and external users to an Enterprise Identity and Access Management System (first release in 2025). • Deployment and optimization of the new Cybersecurity organization and framework of operations in compliance with the new Cyber-regulation. • Coordinate and monitor IT tasks associated with the expiry of the lease • Support the organisation of internal and external meetings • Enhancement of collaboration and workplace solutions, (Document and Record management system)	Ongoing

Activity 19 – Infrastructures (Information technology and Corporate Support)

	Corporate support • Lead the EBA Building Project considering the lease expire in 2028 • Projects related to EBA premises (fit-out, moves, design and maintenance) • Manage the EBA premises and related services (cleaning, reception, postal, furniture, office 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 • Support the provision of catering and canteen services • Support the organisation of internal and external meetings and social events for EBA staff (including reimbursements) • Support the organisation and reimbursement of missions to EBA staff • Adhere to physical security, health and safety requirements and supplies; training; fire wardens and first aiders • Coordination of business continuity annual exercise and plan • Contribute to the improvement and monitoring of an internal control system • Handle procurement procedures and transactions related to CS • Audits: ECA and EC IAS • Contribute to the EBA-wide annual risk assessment exercise and undertake corporate support related specific risk	
	IT • Master and reporting data collection via EUCLID (Supervisory reporting, MiCAR, DORA, Pillar 3 disclosures) • Dissemination of EBA data products to NCAs and public • Implementation of additional data collection capabilities and data dissemination products driven by PSD3, PRS and FIDA regulations • Enterprise identity management gradual delivery and migration of all EBA applications and users • Support and enhancement of code sharing and data sharing platforms with the NCAs • Implementing innovative solutions based on AI and GenAI starting with targeted use cases and proof of concepts, aligned with AI strategy • Support, maintenance, evolve workplace and collaborative solutions	TBC

ANNEX I: ORGANISATION CHART



Post allocation of the **271 authorized posts:**

- ✓ **237.75 EU/NCA funded posts** of which:
  - ➢ 165.75 Temporary Agents (TA):
    - o 154 TA/AD (including 1 TA/AD for SDFA and 2 TA/AD for MiCAR)
    - o 11.75 TA/AST (including 0.75 TA/AST for DORA)
  - ➢ 53 Contract Agents (CA) including 1 CA for SDFA, 2 CA for MiCAR
  - ➢ 19 Seconded National Experts (SNE)
- ✓ **33.25 fee funded posts (FFP)**, of which:
  - ➢ 20 TA/AD for MiCAR, 7.25 TA (6 AD + 1.25 AST) for DORA, 3 TA/AD for EMIR, 2 CA for DORA and 1 SNE for EMIR

**Joint ESAs Department, reports to the three ESAs Executive Directors*

***2 SNE from the overall 19 SNE EU/NCA funded allocated to the EBA*

ANNEX II: RESOURCE ALLOCATION PER ACTIVITY – 2025 - 2028

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.)

		2025					2026					2027					2028				
	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	**73.2**	**15.6**	**9.0**	**97.8**	**21,984,357**	**72.5**	**11.9**	**9.0**	**93.4**	**19,508,975**	**72.5**	**11.9**	**9.0**	**93.4**	**20,006,435**	**72.5**	**11.9**	**9.0**	**93.4**	**20,167,194**
P1	1 - Capital, loss absorbency, accounting	7.6	0.2	0.0	7.8	1,899,109	7.6	0.2	-	7.8	1,724,080	7.6	0.2	-	7.8	1,772,050	7.6	0.2	-	7.8	1,786,290
P1	2 - Liquidity, leverage, interest rate risk	2.9	0.1	-	3.0	874,089	2.9	0.1	-	3.0	703,794	2.9	0.1	-	3.0	722,786	2.9	0.1	-	3.0	728,594
P1	3 - Credit risk (incl. large exposures, loan origination, NPL, securitisation)	7.2	1.8	2.0	11.0	2,473,489	9.2	1.8	2.0	13.0	2,441,562	9.2	1.8	2.0	13.0	2,507,776	9.2	1.8	2.0	13.0	2,527,927
P1	4 - Market, investment firms and services, and operational risk	9.3	0.7	1.0	11.0	2,210,903	10.3	0.7	1.0	12.0	2,447,816	10.3	0.7	1.0	12.0	2,515,856	10.3	0.7	1.0	12.0	2,536,071
P1	5 - Market access, governance, supervisory review and convergence	10.2	0.2	1.0	11.4	2,414,695	10.2	0.2	1.0	11.4	2,403,599	10.2	0.2	1.0	11.4	2,470,505	10.2	0.2	1.0	11.4	2,490,356
P1	6 - Recovery and resolution	4.3	0.1	-	4.4	1,151,317	4.3	0.1	-	4.4	1,068,390	4.3	0.1	-	4.4	1,096,494	4.3	0.1	-	4.4	1,105,305
P1,2	7 - ESG in supervision and regulation	6.4	2.1	1.0	9.5	2,116,405	6.4	2.1	1.0	9.5	1,992,627	6.4	2.1	1.0	9.5	2,043,383	6.4	2.1	1.0	9.5	2,059,802
P3,2	8 - Innovation monitoring and knowledge sharing, … *	12.2	5.7	1.0	18.9	5,781,340	11.7	5.5	1.0	18.2	3,645,144	11.7	5.5	1.0	18.2	3,715,196	11.7	5.5	1.0	18.2	3,745,049
P1,3	9 - Payment services, consumer and depositor protection	5.8	1.4	3.0	10.2	1,866,764	9.9	1.2	3.0	14.1	3,081,963	9.9	1.2	3.0	14.1	3,162,389	9.9	1.2	3.0	14.1	3,187,800
All	10 - Anti-money laundering a. countering the financing of terrorism	7.3	3.3	-	10.6	1,196,246	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Risk assessment and data	**67.1**	**18.7**	**5.0**	**90.8**	**15,314,179**	**69.2**	**19.4**	**5.0**	**93.6**	**20,212,979**	**69.2**	**19.4**	**5.0**	**93.6**	**21,143,582**	**69.2**	**19.4**	**5.0**	**93.6**	**21,313,476**
P2	10 - Oversight and supervision (fee funded)	31.0	2.0	1.0	34.0	600,841	31.0	2.0	1.0	34.0	4,833,260	31.0	2.0	1.0	34.0	5,392,750	31.0	2.0	1.0	34.0	5,436,083
	10a - DORA oversight	*8.0*	*2.0*	*-*	*10.0*	*600,841*	*8.0*	*2.0*	*-*	*10.0*	*3,393,646*	*8.0*	*2.0*	*-*	*10.0*	*3,525,305*	*8.0*	*2.0*	*-*	*10.0*	*3,553,632*
	10b - MICAR supervision	*20.0*	*-*	*-*	*20.0*	*-*	*20.0*	*-*	*-*	*20.0*	*1,003,708*	*20.0*	*-*	*-*	*20.0*	*1,103,320*	*20.0*	*-*	*-*	*20.0*	*1,112,185*
	10c - EMIR validation of certain IMM	*3.0*	*-*	*1.0*	*4.0*	*-*	*3.0*	*-*	*1.0*	*4.0*	*435,906*	*3.0*	*-*	*1.0*	*4.0*	*764,126*	*3.0*	*-*	*1.0*	*4.0*	*770,266*

		2025					2026					2027					2028				
	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)**
All	11 - Reporting and transparency framework	9.9	1.0	1.0	12.0	2,937,264	9.9	1.0	1.0	12.0	2,922,788	9.9	1.0	1.0	12.0	2,998,988	9.9	1.0	1.0	12.0	3,023,086
P2	12 - Risk analysis	5.4	-	1.0	6.4	1,330,331	5.4	-	1.0	6.4	1,530,816	5.4	-	1.0	6.4	1,571,165	5.4	-	1.0	6.4	1,583,790
P2	13 - Stress testing	5.2	-	1.0	6.2	1,519,302	7.2	1.0	1.0	9.2	1,939,443	7.2	1.0	1.0	9.2	1,991,080	7.2	1.0	1.0	9.2	2,007,078
All	14 - Regulatory impact assessments	8.4	2.1	1.0	11.5	2,599,053	8.4	2.1	1.0	11.5	2,388,475	8.4	2.1	1.0	11.5	2,450,901	8.4	2.1	1.0	11.5	2,470,595
All	15 - Data infrastructure and services, statistical tools	7.2	13.6	-	20.8	6,327,388	7.3	13.3	-	20.6	6,598,197	7.3	13.3	-	20.6	6,738,697	7.3	13.3	-	20.6	6,792,844
	Coordination and support	**55.7**	**20.7**	**6.0**	**82.4**	**21,923,565**	**59.3**	**21.7**	**6.0**	**87.0**	**26,037,451**	**59.3**	**21.7**	**6.0**	**87.0**	**26,668,478**	**59.3**	**21.7**	**6.0**	**87.0**	**26,882,765**
ALL	16 - EBA governance, international affairs, communication	5.1	8.3	3.0	16.4	2,660,511	7.7	8.3	3.0	19.0	3,197,511	7.7	8.3	3.0	19.0	3,276,714	7.7	8.3	3.0	19.0	3,303,043
ALL	17 - Legal and compliance	13.2	1.0	2.0	16.2	3,604,320	13.2	1.0	2.0	16.2	3,321,456	13.2	1.0	2.0	16.2	3,414,132	13.2	1.0	2.0	16.2	3,441,565
ALL	18 - Resources (HR and finance)	14.5	5.6	-	20.1	4,617,173	14.5	5.6	-	20.1	4,538,562	14.5	5.6	-	20.1	4,656,025	14.5	5.6	-	20.1	4,693,437
ALL	19 - Infrastructures (Information technology and corporate support)	22.9	5.8	1.0	29.7	11,041,561	23.9	6.8	1.0	31.7	14,979,922	23.9	6.8	1.0	31.7	15,321,607	23.9	6.8	1.0	31.7	15,444,720
	TOTAL	**196.0**	**55.0**	**20.0**	**271.0**	**59,222,101**	**201.0**	**53.0**	**20.0**	**274.0**	**65,759,405**	**201.0**	**53.0**	**20.0**	**274.0**	**67,818,495**	**201.0**	**53.0**	**20.0**	**274.0**	**68,363,435**

* Activity 8 - Innovation monitoring and knowledge sharing, ICT policy and operational resilience. It covers MiCAR and DORA preparations (in part in 2025, 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 4 EU-funded posts (for MiCAR) foreseen in the Union budget.

In relation to Activity 10 - Oversight and supervision activities it is noted:

- For DORA oversight the situation is as follows: In 2025, all 8 allocated fee-funded TA posts should be filled by year end. The 2 fee-funded CA posts should be filled in 2026.
- For MiCAR supervision the situation is as follows: The allocated EU-funded posts (2 TA and 2 CA posts) were filled in 2024 and are allocated to activity 8. From 2026, 3 of the 20 fee-funded TA posts should be filled.
- For validation of certain initial margin models under EMIR, the fee-funded TA and SNE posts should be filled from mid-2026.
- The costs related to Oversight and supervisory activities do not include the administrative overheads.

ANNEX III: FINANCIAL RESOURCES 2026-2028

Table 1 – Revenues (COM report format)

REVENUES	2024 executed budget	2025 budget	2026 requested budget	Envisaged 2027	Envisaged 2028
1 REVENUE FROM FEES AND CHARGES	**-**	**895,000**	**6,730,000**	**7,620,000**	**7,772,400**
2. EU CONTRIBUTION	**20,857,871**	**21,303,298**	**21,556,465**	**21,987,594**	**22,427,346**
of which assigned revenues deriving from previous years' surpluses	*134,440*	*-424,468*	-	-	-
3 THIRD COUNTRIES CONTRIBUTION (incl. EFTA)	**1,054,571**	**1,084,651**	**1,100,673**	**1,123,585**	**1,146,057**
of which EFTA	*1,054,571*	*1,084,651*	*1,100,673*	*1,123,585*	*1,146,057*
4 OTHER CONTRIBUTIONS	**34,993,759**	**35,939,152**	**36,372,268**	**37,087,316**	**37,017,632**
of which EU NCA contributions	*34,062,640*	*35,034,213*	*35,551,748*	*36,291,796*	*37,017,632*
of which host state contributions	*575,000*	*575,000*	*575,000*	*550,000*	-
of which DG REFORM contributions	*356,119*	*329,939*	*245,520*	*245,520*	-
5 ADMINISTRATIVE OPERATIONS					
6 REVENUES FROM SERVICES RENDERED	-	-	-	-	-
7 CORRECTION OF BUDGETARY IMBALANCES					
TOTAL REVENUES	**56,906,201**	**59,222,101**	**65,759,405**	**67,818,495**	**68,363,435**

Calculating NCA contributions

	Inputs	2026 value	Source
A	Amount of the EU subsidy	21,556,465	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)	3,316,650	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 agreement14F19F[18]

Calculation formulae:

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

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

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

Table 2 – Expenditure

EXPENDITURE	Budget 2024 actual[19]	Budget 2025	Budget request 2026	Envisaged 2027	Envisaged 2028
Title 1 Staff expenditure	**36,539,088**	**39,705,588**	**43,962,188**	**45,607,524**	**46,469,535**
11 Salaries & allowances	31,493,633	34,149,426	37,635,466	39,074,468	39,855,957
- of which establishment plan posts	*25,543,431*	*27,494,223*	*30,626,445*	*31,845,839*	*32,482,756*
- of which external personnel	*5,950,202*	*6,655,203*	*7,009,021*	*7,228,629*	*7,373,202*
11.33 Employer's pension contributions	2,861,772	3,231,000	3,694,950	3,848,648	3,925,621
12 Expenditure relating to staff recruitment	324,779	399,298	364,328	371,615	379,047
13 Mission expenses	111,035	128,100	148,330	151,297	150,000
14 Socio-medical infrastructure	635,969	809,290	839,975	856,774	873,909
15 Training	455,832	446,120	527,480	538,030	530,000
16 External Services	518,905	404,291	607,086	619,228	610,000
17 Receptions and events	137,163	138,063	144,573	147,464	145,000
Title 2 Infrastructure and operating expenditure	**12,267,264**	**12,040,674**	**14,347,554**	**14,634,506**	**14,618,363**
20 Rental of buildings and associated costs	4,955,855	4,664,107	5,469,346	5,578,733	5,690,308
21 Information and communication technology	6,469,175	6,566,822	7,890,074	8,047,876	7,900,000
23 Current administrative expenditure	510,815	469,429	615,025	627,325	639,872
25 Information and publishing	331,419	340,316	373,110	380,572	388,183
Title 3 Operational expenditure	**8,038,909**	**7,475,839**	**7,449,663**	**7,576,466**	**7,275,537**
31 General operational expenditure	2,106,622	2,392,707	3,044,607	3,105,499	3,007,760
32 IT expenditure for operational purposes	5,932,287	5,083,132	4,405,055	4,470,966	4,267,777
TOTAL EXPENDITURE	**56,845,261**	**59,222,101**	**65,759,405**	**67,818,495**	**68,363,435**

[19] Budget 2024 shows actual expenditure on voted budget.

Table 3 – Budget outturn and cancellation of appropriations

Budget outturn	2022	2023	2024 (draft)
Reserve from the previous year's surplus (+)	467 881	605 145	207 903
Revenues actually received (+)	50 628 924	52 468 356	57 141 315
Payments made (-)	-43 982 571	- 48 857 367	- 53 460 598
Carry-over of appropriations (-)	-7 059 468	- 3 945 729	- 4 083 955
Cancellation of appropriations carried over (+)	124 390	71 989	79 877
Adjustment for carry-over of assigned revenue appropriations from previous year (+)	166 169	737 110	383 753
Exchange rate differences (+/-)	-2 982	1 379	- 30
Adjustment for negative balance from previous year (-)		-	-
Total surplus	**342 343**	**1 080 883**	**140 240**

The 2024 budget outturn is a draft figure that may still require adjustment during the accounts closure.

The 2024 surplus will be offset against 2026 contributions.

One hundred and twenty-two (122) commitments were carried over from 2023 to 2024. The EBA decommitted 2.24 % of the value of commitments carried over i.e., EUR 79,877 from a total of EUR 3,563,694. This is a slightly higher monetary amount than was decommitted on the previous year's carry forward, however by the EBA's estimation at least 47 % of the decommitted amount arose from matters outside the EBA's control.

ANNEX IV: HUMAN RESOURCES - QUANTITATIVE

Table 1 – 2026-2028 overview of staff by contract type

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

Staff	2024 Year N-1			2025 Year N	2026 Year N+1	2027 Year N+2	2028 Year N+3
ESTABLISHMENT PLAN POSTS	**Authorised Budget**	**Actually filled as of 31/12/2024**	**Occupancy rate%[h]**	**Authorised staff**	**Envisaged staff**	**Envisaged staff**	**Envisaged staff**
Administrators (AD)	151	147	97%	151	160 (151+9)	160 (151+9)	160 (151+9)
Assistants (AST)	11	10	91%	11	11	11	11
Assistants/Secretaries (AST/SC)[a]	-			-	-	-	
SDFA[b]	1	1	100%	1	1	1	1
MiCAR[c]	20 (0 of 18 FFP)	1	(50%)	22 (0 of 20 FFP)	22(3 of 20 FFP)	22 (x of 20 FFP)	22 (x of 20 FFP)
DORA[d]	6 (2 of 5 FFP)	3	50%	8 (4.5 of 7.25 FFP) (6 AD+2 AST)	8 (8 of 8 FFP) (6 AD+1 AST+1AST/SC)	8 (8 of 8 FFP) (6 AD+1 AST+1AST/SC)	8 (8 of 8 FFP) (6 AD+1 AST+1AST/SC)
EMIR[e]	-	-	-	3 (0 of 3 FFP)	3 (3 of 3 FFP)	3 (3 of 3 FFP)	3 (3 of 3 FFP)
AMLA[f]	-	-	-	-	-4	-4	-4
TOTAL ESTABLISHMENT PLAN POSTS	**189**	**162**	**86% (98%)**	**196**	**201 (192 + 9)**	**201 (192 + 9)**	**201 (192 + 9)**
EXTERNAL STAFF	**FTE from authorised Budget**	**Executed FTE as of 31/12/2024**	**Execution rate %[h]**	**FTE from authorised budget**	**Envisaged FTE**	**Envisaged FTE**	**Envisaged FTE**
Contract Agents (CA)	50	50	100%	50	52 (50+2)	52 (50+2)	52 (50+2)
SDFA[b]	-	-	-	-	-	-	-
MiCAR[c]	2	2	100%	2	2	2	2
DORA[d]	-	-	-	2 (0 of 2 FFP)	2 (2 of 2 FFP)	2 (2 of 2 FFP)	2 (2 of 2 FFP)
AMLA[f]	-	-	-	-	-4	-4	-4
Seconded National Experts (SNE)[g]	19	15	79%	20 (0 of 1 FFP) (19+1 EMIR FFP)	20 (1 of 1 FFP) (19+1 EMIR FFP)	20 (1 of 1 FFP) (19+1 EMIR FFP)	20 (1 of 1 FFP) (19+1 EMIR FFP)
TOTAL EXTERNAL STAFF	**71**	**67**	**94%%**	**74**	**72 (70+2)**	**72 (70+2)**	**72 (70+2)**
TOTAL STAFF	**260**	229	88% (97%)	**270**	**273 (262+11)**	**273 (262+11)**	**273 (262+11)**
- EU/NCA funded **- Fee-funded posts**	237 23			237.75 33.25	240 33	240 33	240 33
REQUEST FOR ADDITIONAL RESOURCES					11 (9 AD + 2 CA)	11 (9 AD + 2 CA)	11 (9 AD + 2 CA)
- of which: permanent					6 (4 AD + 2 CA)	6 (4 AD + 2 CA)	6 (4AD + 2 CA)
- **of** which temporary (3 years)					5 (5 AD 3 years)	5 (5 AD 3 years)	5 (5 AD 3 years)

FFP stands for fee-funded post

[a] Out of the 2 DORA AST posts, one post to be recategorized into AST/SC as per EC/DG HR recommendation to implement this new staff category as part of the SR reform. The AST/SC position to be recruited for DORA Director's assistance.

[b] SDFA: 1 AD and 1 CA funded by DG REFORM (signed SLA in 2022: from 2023 until end of 2025). Assumption that SLA will be extended to 2028, hence 1 AD and 1 CA are kept. The CA post for SDFA, funded by DG REFORM, is shown in Table 1.b below.

[c] MiCAR: In total the EBA is allocated 22 AD posts and 2 CA posts.

- 2023: total of 15 AD fee funded posts.
- 2024 : 3 additional AD fee funded posts + 2 AD EU/NCA-funded posts representing a total of 20 AD posts and 2 CA EU/NCA funded posts planned for indirect supervision tasks for MiCAR. 2 AD and 2 CA (EU/NCA funded) filled.

- 2025: 2 additional AD fee funded posts.
- 2026: Fee funded posts to be filled gradually from 2026.

[d] DORA: out of the 30 posts (ultimately fee funded) allocated to the three ESAs, the EBA (considering an equal share) is allocated a total of 10 posts (6 AD, 2 AST and 2 CA). Out of the 2 DORA AST posts, 1 AST IT filled in 2024 (EU/NCA funded until Q3 2025). For the second AST post, see foot note a.
[e] EMIR validation of certain IMM: allocation of 3 AD fee funded posts and 1 SNE from 2025. Start of validation not before 2026.
[f] AMLA: total of 8 posts to be removed given transfer of certain responsibilities to AMLA (4 AD and 4 CA).
[g] SNE: 19 "structural cost paid SNEs" + 1 SNE fee funded for EMIR to be hired in 2026. The EBA also relies on 9 cost-free SNE.
[h] Percentages in brackets are showing the real occupancy rate without MiCAR/DORA/EMIR fee-funded posts.
Further information on the request for additional resources is included in sections II.2.

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 31/12/2024
Security	-
IT	33
Other (specify) **Corporate Support**	7

Interim workers	Total FTEs in year 2024 N-1
Number	5

Table 2 – 2024-2028 -overview of staff by grade

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

Function group and grade	2024 Year N-1				2025 Year N		2026 YearN+1		2027 Year N+2		2028 Year N+3	
	Authorised budget		Actually filled as of 31/12/2024		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		1		1		1		1		1
AD 15		1		0		1		1		1		1
AD 14		5		3		5		5		5		5
AD 13		2		0		2		2		2		2
AD 12		8		10		12		13		13		13
AD 11		12		7		10		11		12		12
AD 10		13		17		19		20		20		20
AD 9		25		24		25		27		26		26
AD 8		28		27		30		31		31		31
AD 7		32		31		35		40*		42		42
AD 6		21		15		20		21		19		19
AD 5		29		16		23		16		16		16
AD TOTAL	-	**177**		**151**	-	**183**	-	**188**		**188**	-	**188**
AST 11												
AST 10												
AST 8												
AST 7						1		1		1		1
AST 6		3		1		2		3		3		4
AST 5		4		2		2		3		3		3
AST 4		3		3		5		4		4		3
AST 3		1		3		2		1		1		1
AST 2		1		2		1						
AST 1		0		0								
AST TOTAL	-	**12**		**11**	-	**13**	-	**12**	-	**12**	-	**12**
AST/SC*TOTAL	-	-		-	-	-	-	**1**	-	**1**	-	**1-**
TOTAL	-	**189**			-	**196**	-	**201**	-	**201**	-	**201**

*4 TA/AD7 posts to be removed given the transfer of certain responsibilities to AMLA. Request of 9 additional TA/AD7 posts needed for addressing challenges/avoid delays (CRR III, CRD VI, CMDI, Stress testing, Data, Cybersecurity).

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

Contract agents	FTE corres-ponding to authorised budget 2024 N-1	Executed FTE as of 31/12/2024 N-1	Headcount as of 31/12/2024 N-1	FTE corres-ponding to authorised budget 2025 N	FTE corres-ponding to authorised budget 2026 N+1	FTE corres-ponding to authorised budget 2027 N+2	FTE corres-ponding to authorised budget 2028 N+3
Function group IV	44*	44	44	46**	44***	44	44
Function group III	8	8	8	8	8	8	8
Function group II	-	-	-	-	-	-	-
Function group I	-	-	-	-	-	-	-
TOTAL	52*	52	52	54**	52***	52	52

* Figures without 1 CA/FG IV for SDFA funded by DG REFORM (as included in table 1.b) with the assumption that SLA will be extended to 2028.
** Figure includes 2 CA/FG IV posts for MiCAR (EU/NCA funded) and 2 CA/FG IV posts for DORA (fee funded).
***Figure without 4 CA/FG IV posts for AMLA and including the request of 2 additional CA FG/IV for posts needed for addressing challenges/avoid delays (Data and Cybersecurity).

Overview Seconded National Experts (SNEs) (with EMIR)

Seconded National Experts	FTE corres-ponding to authorised budget 2024 (N-1)	Executed FTE as of 31/12/2024 (N-1)	Headcount as of 31/12/2024 (N-1)	FTE corres-ponding to authorised budget 2025 (N)	FTE corres-ponding to authorised budget 2026 (N+1)	FTE corres-ponding to authorised budget 2027 (N+2)	FTE corres-ponding to authorised budget 2028 (N+3)
TOTAL	19	15	15	20*	20	20	20

* The EBA has 19 "structural cost paid SNEs" + 1 SNE fee funded for EMIR to be hired in 2026. The EBA also relies on 9 cost-free SNE.

Table 3 – 2025 recruitment forecasts following retirement/mobility or new requested posts

Job title in the Agency	Type of contract (Official, TA or CA)	TA/Official		CA
		Function group/grade of internal (brackets) and external (single grade) recruitment foreseen for publication		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[20]: 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

[20] 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[21].

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[22]: 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

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

[22] 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 2024, 13 staff benefited from internal mobility opportunities. Additionally, mutually enriching internal professional developments have been agreed for 2 EBA staff members.

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, step as the preceding contract and career.

In 2024, 1 inter- agency vacancy was published and successfully concluded, while 1 EBA staff member was recruited via inter-agency mobility with another EU agency..

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 2024, 14 staff benefitted from external mobility opportunities with different institutions such as Eurojust, EFSA, DG FISMA, ECB, IMF, MFSA and Bank of Italy.

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 2024 Performance Management Cycle has been successfully conducted in four steps: (1) the appraisal exercise (January – March) aiming at assessing staff's efficiency, ability and conduct (2) the Talent Review meetings (April) identifying the "talent production line" moving forward and evaluating staff expression of interests for internal and external mobility (3) the reclassification exercise (May-June) and (4) the mid-term review dialogue (July-September).

The reclassification exercise, with the comparison of merits meeting, resulted in 27 staff reclassified (18 TA/ADs, 2 TA/ASTs and 7 CAs) representing 50% female vs 50% male for TA and 57% female vs 43% male for CA with a good distribution across departments (5 in DART, 4 in ERA, 5 in ICC, 5 in OPER, 4 in PRSP, 4 in other support) The overall TA appeal rate for eligible staff was 2.3% (2024, 3 appeals) vs 1.8 % last year (2023, 2 appeals). There were no CA appeals this year, i.e. 0%, same as last year. 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 2024.

As part of the EBA's commitment to strictly respect the rates indicated in Annex IB of the SR, all reclassified staff met the indicative duration of career per type of post and grade.

Table - Reclassification of TA

Grades	2020 (N-5)	2021 (N-4)	2022 (N-3)	2023 (N-2)	2024 (N-1)	2025 (N)	Actual average over 5 years*	Average over 5 years (According to decision C(2015)9563)**
AD05	5.2	3.1	3.8	-	2.8		**3.7**	**2.8**
AD06	2.3	3.5	3.7	3.5	4.7		**3.5**	**2.8**
AD07	2.6	6.7	3.4	4.6	3.6		**4.2**	**2.8**
AD08	3.4	5.0	3.6	4.0	4.5		**4.0**	**3.0**
AD09	2.0	6.8	4.2	6.0	5.0		**4.8**	**4.0**
AD10	-	4.0	4.4	-	7.0		**5.1**	**4.0**
AD11	-	-	4.0	-	-		**4.0**	**4.0**
AD12	-	-	-	-	-		**-**	**6.7**
AD13	-	-	-	-	-		**-**	**6.7**
AST1	-	-	-	-	-		**-**	**3.0**
AST2	-	-	-	-	3.0		**3.0**	**3.0**
AST3	-	-	-	-	4.3		**4.3**	**3.0**
AST4	-	-	-	-	-		**-**	**3.0**
AST5	-	6.6	-	-	-		**6.6**	**4.0**
AST6	-	-	-	-	-		-	**4.0**
AST7	-	-	-	-	-		-	**4.0**
AST8	-	-	-	-	-		-	**4.0**
AST9	-	-	-	-	-		-	**N/A**
AST10 (Senior assistant)	-	-	-	-	-		-	**5.0**

Grades	2020 (N-5)	2021 (N-4)	2022 (N-3)	2023 (N-2)	2024 (N-1)	2025 (N)	Actual average over 5 years*	Average over 5 years (According to decision C(2015)9563)**
AST/SC1	-	-	-	-	-		-	4.0
AST/SC2	-	-	-	-	-		-	5.0
AST/SC3	-	-	-	-	-		-	5.9
AST/SC4	-	-	-	-	-		-	6.7
AST/SC5	-	-	-	-	-		-	8.3

* As figures for 2025 will only become available later, the averages are based on years 2020 to 2024.

**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 (AD12) the alignment is slower.

Table - Reclassification of contract staff

Function Group	Grade	Staff in activity at 1.01.2023 (N-2))	How many staff members were reclassified in 2024 (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	3	-	-	Between 6 and 10 years
	16	2	1	4.3	Between 5 and 7 years
	15	9	3	3.2	Between 4 and 6 years
	14	16	2	3.3	Between 3 and 5 years
	13	6	-	-	Between 3 and 5 years
CA III	11	2	-	-	Between 6 and 10 years
	10	2	-	-	Between 5 and 7 years
	9	2	1	4.7	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[23] 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, 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.

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

- 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 a Gender Balance Working Group chaired by the Executive Director) and exchange with the Staff Committee.
- Offering development opportunities and exchange fora (mentoring programme, organisation of the third high-level conference of 15 November 2024 on Financial Services and Gender: Data, Trends & Progress in the EU and beyond).
- Developing interactive platform (EBA intranet/website) for promoting best practices, sharing knowledge (with testimonial videos, data, etc).
- Championing D&I initiatives at EUAN level (adoption of the EUAN charter on D&I, development of an EBA D&I toolkit for managers, Mental Health round table chaired by the EBA ED, 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.

Table 1 - Data on 31/12/2024 of Statutory Staff (TAs and CAs)

		Temporary		**Contract agents**		**Grand Total**	
		Staff	**%**	**Staff**	**%**	**Staff**	**%**
Female	Administrator level	71	43.8%	24	46.2%	95	44.4%
	Assistant level (AST & AST/SC)	6	3.7%	7	13.5%	13	6.1%
	Total	**77**	47.5%	**31**	59.6%	**108**	50.5%
Male	Administrator level	80	49.4%	20	38.5%	100	46.7%
	Assistant level (AST & AST/SC)	5	3.1%	1	1.9%	6	2.8%
	Total	**85**	52.5%	**21**	40.4%	**106**	49.5%
Grand total		**162**	100.0%	52	100.0%	214	100.0%

Table 2 - Data on gender evolution over five years of the Middle and Senior Management

	2020 (N-5)		**2024 (N-1)**	
	Number	**%**	**Number**	**%**
Female managers	6	28.6%	10	41.7%
o.w. EBA Directors	1	20.0%	3	60.0%
Male managers	15	71.4%	14	58.3%

E. Geographical balance

Explanatory figures to highlight nationalities of staff (split per Administrator/CA FG IV and Assistant /CA FG I, II, III

Table 1 - Data on 31/12/24 – statutory staff only (TAs and CAs)

Nationality	AD + CA FG IV		AST/SC- AST + CA FGI/CA FGII/CA FGIII		TOTAL	
	Number	% of total staff members in AD and FG IV categories	Number	% of total staff members in AST SC/AST and FG I, II and III categories	Number	% of total staff
Austria	3	1.5%	1	5.3%	4	**1.9%**
Belgium	3	1.5%	2	10.5%	5	**2.3%**
Bulgaria	3	1.5%	1	5.3%	4	**1.9%**
Croatia	3	1.5%	-	-	3	**1.4%**
Cyprus	3	1.5%	-	-	3	**1.4%**
Czech Republic	-	-	1	5.3%	1	**0.5%**
Denmark	1	0.5%	-	-	1	**0.5%**
Estonia	3	1.5%	-	-	3	**1.4%**
Finland	4	2.1%	1	5.3%	5	**2.3%**
France	26	13.3%	2	10.5%	28	**13.1%**
Germany	11	5.6%	1	5.3%	12	**5.6%**
Greece	11	5.6%	-	-	11	**5.1%**
Hungary	6	3.1%	-	-	6	**2.8%**
Ireland	3	1.5%	-	-	3	**1.4%**
Italy	40	20.5%	1	5.3%	41	**19.2%**
Latvia	3	1.5%	-	-	3	**1.4%**
Lithuania	4	2.1%	-	-	4	**1.9%**
Luxembourg	2	1.0%	-	-	2	**0.9%**
Malta	1	0.5%	-	-	1	**0.5%**
Netherlands	2	1.0%	-	-	2	**0.9%**
Poland	6	3.1%	4	21.1%	10	**4.7%**
Portugal	14	7.2%	-	-	14	**6.5%**
Romania	13	6.7%	2	10.5%	15	**7.0%**
Slovakia	3	1.5%	-	-	3	**1.4%**
Slovenia	2	1.0%	-	-	2	**0.9%**
Spain	19	9.7%	2	10.5%	21	**9.8%**
Sweden	1	0.5%	1	5.3%	2	**0.9%**
United Kingdom	5	2.6%	-	-	5	**2.3%**
TOTAL	**195**	**100%**	**19**	**100%**	**214**	**100%**

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

Most represented nationality	2020 N-5		2024 N-1	
	Number	%	Number	%
Italian	34	17.3%	41	19.2%

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:	10 agreements for primary and secondary education 19 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 2024-2025:

Nursery: up to 4 years old	30
Maternelle: more than 4 years old and up to 6 years old	19
Primary: More than 6 years old and less than 11 years old	44
Secondary: More than 11 years old and less than 19 years old	64
Total	157

ANNEX VI: PROCUREMENT PLAN

The list below shows existing procurement procedures with an estimated value above EUR 15,000 that EBA expects to work on in 2026, including the targeted status by year end 2026. The possibility of joint procurement has been identified however it is not certain 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	Target status
Existing services/supply contracts					
Water dispensers	Negotiated	Framework (4 years)	20 000	No	Signed
Legal services – office lease	Negotiated	Framework (4 years)	80 000	Possible	Signed
IT consultancy services [alternatively, EBA may join other agency procedure]	Open	Framework (4 years)	20 000 000	Possible	Signed
Bank guarantee	Negotiated	Direct	20 000	No	Signed
Building lease	Exceptionally negotiated	Direct	40 000 000	Possible	Signed
Crypto-assets market data	Open	Framework (4 years)	150 000	No	Evaluating
Catering services	Open	Framework (4 years)	800 000	No	Launched
Office fit-out: project management [depending on outcome of Lease procurement]	Open	Framework (4 years)	600 000	Possible	Drafting
Corporate support consultancy	Open	Framework (4 years)	2 000 000	Yes	Drafting
Environmental and EMAS consultancy	Open	Framework (4 years)	600 000	Yes	Signed

For contracts ending in 2026 or the first half of 2027 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 foresees a small number of negotiated procedures with a value in the range 1-15 KEUR to be run in 2026.

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.

Moreover, the EBA adopted the *EU Agencies Network Charter on the reduction of greenhouse gas emissions and responsible environmental management* and endeavours to take all reasonable measures in achieving climate neutrality by 2030 within the scope of its activities and resources.

Environmental objectives and targets

Improvement area	No.	Strategic objective 3-year cycle 2025-2027
EMISSIONS	EM.1	Maintain the reduced levels of business travel (missions and travel of visitors)
	EM.2	Increase green transport options for home-office commuting
	EM.3	Reduce energy consumption
	EM.4	Improve reporting
CAPACITY BUILDING	CB.1.	Set up environmental objectives for the majority of staff
	CB.2	Train staff and in-house consultants on EMAS, sustainable finance, and ESG risks
	CB.3	Introduce sustainability reporting
	CB.4	Digitalise and automate data collection
	CB.5	Engage and inform staff and stakeholders
	CB.6	Contribute to creating sustainable premises and workplaces
CIRCULAR ECONOMY	CE.1	Minimise purchases of physical items so as to limit our material impact
	CE.2	Buy to keep
	CE.3	Maximise the life cycle of products
	CE.4	Minimise the generation of waste
	CE.5	Dispose of items in an environmentally friendly manner

CORE BUSINESS	CB.1	Deliver on time (at least …% 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
	CB.2	Establish a KPI for the EBA's participation to external events with ESG component*

* KPI under discussion and to be specified in due course.

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 [24] square metres	1 408 [25] square metres	Net office space: 5 403 square metres	EUR 538.01 [26] per square metre Annual cost = EUR 2 906 856	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 loyers des activités tertiaires* (ILAT).	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.

[24] Reception / Lobby 184m2; Meeting rooms - Visitors 533m2; Internal meeting rooms 346m2; Storage / Print rooms/ Corridors 695m2; Break out area visitors 192m2; Break out area staff 98m2; Open Plan (including individual offices) 1,947m2.

[25] 1,341m2 shared areas including lift banks, 67m2 archives (at basement level minus 4).

[26] 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.

ANNEX IX: PRIVILEGES AND IMMUNITIES

Agency privileges	Privileges granted to staff	
	Protocol of privileges and immunities/diplomatic status	**Education/day care**
Refunds of value added tax (VAT) for purchases of goods and services for the agency, including vehicles	• Importation of personal effects including motor vehicles free of customs duty and VAT • Special vehicle registration • A special residence permit	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. Plans to move the Accredited European School Paris La Défense to a single purpose-built site in 2028 have been postponed to a potential delivery date in 2032 pending the outcome of further studies. This prevents the Accredited European School from expanding to accommodate the three linguistic sections normally required for accreditation and to cater for all future children of EU staff employed in Paris. For children who do not attend this school, education allowances are determined and paid when due.

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[27].

The EC 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.' It also identified 'some areas where improvements (which) could be implemented with no need for legislative changes, and (it) 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, it underlined the increasing number of cross-sectoral tasks and topics that must be dealt with by the ESAs as part of the JC. As a consequence, the EC 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 ESAs made progress in fostering supervisory convergence in the area of enforcement and supervisory independence (see joint criteria published on their websites[28]). 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 by:

- The 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; as well as by
- The European Court of Auditors, the EC's Internal Audit Services, and the yearly external financial audits; and through
- The publication of the EBA'S Consolidated Annual Activity Report and Annual Report which provide an overview of the execution of the work programme and more detail on the above external evaluations.

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

[28] 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 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 manages 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 directorates and 17 unit:

- 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 units - *Legal and Compliance* and *Governance and External Affairs* - and the *Accounting function* report directly to the Executive Director.

An additional directorate – **DORA Joint Oversight**, was established in October 2024 as a joint ESAs department reporting to the three Executive directors. It will initially consist of three units.

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. The EBA will continue to carry out its regular annual cycle of comprehensive RM assessment of its operations, developing and implementing action plans where strategic risks fall outside the risk tolerances adopted (and reviewed annually), reviewing the strategic risk register and continuing to identify and evaluate additional potential risks that could materialise within the organisation.

This underpins an overview of aggregated risks and allows 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 is carried out at the strategic level. This will continue to be complemented by increased levels of implementation of a more consistent approach to local risk management across the EBA's organisation, including through consideration of the risks in individual Work Programme activities.

These processes will be continuously reviewed and updated through 2026 to 2028, 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 new Anti-Fraud Policy and Strategy, to be adopted in 2025, provides the foundation for all activities that the EBA carries out in respect of fraud risks. The policy is based on four main objectives, namely a) prevent, b) detect and investigate, c) recover, mitigate and respond, and d) exploit.

The strategy is expected to set out the following objectives for 2025-2027: maintaining a high level of ethics and anti-fraud culture; continuing to ensure the absence of conflicts of interests of staff; clarifying the conflict of interest rules and adjusting them to new tasks; exploring new ways of reporting fraud; enhancing certain current processes/systems to reduce fraud; maintaining exchange of best practices and joint-risk-response with agencies with a similar fraud profile.

An anti-fraud risk assessment will be carried out in 2027 to identify activities and processes that could result in fraud and evaluate them to find out the level of fraud risk that they carry. This will lead to development of a new anti-fraud strategy, in particular to revise the objectives and set out a new action plan to address any material or significant risks identified.

Anti-fraud training will continue to be delivered in conjunction with the EBA's annual mandatory ethics training programme.

The EBA's ethics guidelines and framework will be kept under review in particular to take into account the developments in 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 and artificial intelligence governance

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. Ongoing developments in IT use of cloud technology and use of artificial intelligence will require ongoing monitoring of trends, technologies and data protection risks arising from them. Implementation of DORA and MiCAR and commencement of oversight, direct supervision and investigation activities are also expected to be a focus of activity.

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	1,079,515	Four years	DG REFORM	Providing support to 20 Member States to strengthen supervisory capacity in the area of innovative digital finance	Amount	356,119	257,657		
						Number of TA	1	1		
						Number of CA	1	1		
						Number of SNEs				
2. EU Supervisory Digital Finance Academy	Q1 2025	736,556	Four years	DG REFORM	Providing support to 20 Member States to strengthen supervisory capacity in the area of innovative digital finance	Amount		72,282.00	245,520	245,520
						Number of CA		1	1	1
						Number of SNEs				
….						Amount				
						Number of CA				
						Number of SNEs				
Total contribution agreements						Amount	356,119	329,939	245,520	245,520
						Number of TA	1	1	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 ORGANISATIONS

Strategy for cooperation with third countries

In recent years, EBA's engagement in the assessment of the equivalence of third countries has increased, 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 and AML/CFT colleges. Confidentiality assessments for DORA/MICA purposes will help to establish international cooperation with third countries on CTPP oversight and ART/EMT supervision. Moreover, the EBA monitors third-country regulatory and supervisory frameworks on an on-going basis and uses its work on equivalence and the development of cooperation agreements to deepen its relationships with supervisory authorities from non-EU countries. Monitoring activities focus on relevant regulatory and supervisory developments and market developments in these countries and their implications for financial stability, market integrity, investor protection and the functioning of the internal market.As part of its engagement with third countries, the EBA is also expanding its relationship with neighbouring countries and potential candidates to EU enlargement and provides its support to these third countries where needed.

Strategy for cooperation with international organisations.

The 2020 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 bank supervisors to cooperate.

The EBA at the BCBS: The EBA has an observer role and participates in the meetings of the Committee and of its parent body (Governors and Heads of Supervision), and those of relevant working structures. To best represent the interest of the EU and its Member States, European participants, including the European Commission and the EBA given their regulatory roles in the EU, strive to coordinate their positions.

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), 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. 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 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 shares its direct experience of policy development and practices in European recovery and resolution planning for the purpose of developing global policy and monitoring compliance with international standards. It coordinates closely with the EC and the Single Resolution Board. The core objective is to ensure that post-GFC 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. The EBA also contributes to the Financial Sector Assessment Program (FSAP) of the Euro Area. 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: PEER REVIEW WORK PLAN UNTIL 2027

In accordance with Article 30 (8) of the EBA Regulation the EBA publishes its peer review work plan for the coming two years. In case of urgency or unforeseen events, the EBA may substitute or decide to carry out additional peer reviews.

Peer reviews to be launched in 2025- 2026

- Supervision of Pillar 3 disclosures (launch Q2 2025): A peer review on how CAs are supervising Pillar 3 disclosures in advance of the introduction of the Pillar 3 hub with a view to identifying the supervisory practices that best support effective disclosure.

In addition, 1 or 2 of the following topics may be selected:

- MiCAR authorisation
- Interest rate risk in the banking book
- Loan origination and monitoring & ESG
- Resolution testing
- Supervision of liquidity under SREP
- Consumer protection

Follow-up peer reviews due to be launched in 2025-2026

- Authorisation under PSD2 (launch Q1 2025)
- Supervision of credit valuation adjustment (CVA) risk (launch Q1 2025)
- Treatment of mortgage borrowers in arrears
- Proportionality under SREP
- Definition of Default

Work currently envisaged from 2027 onwards

- Tax integrity (cum ex/cum cum)[29]
- DGS stress testing
- Supervision of gender diversity
- Supervision of Pillar 3 disclosures

[29] To be reviewed in the light of the transfer of the EBA's AML/CFT tasks to the Anti-Money Laundering Authority.

eba European Banking Authority

Tour Europlaza, 20 avenue André Prothin CS 30154
92927 Paris La Défense CEDEX, FRANCE

Tel. +33 1 86 52 70 00

E-mail: info@eba.europa.eu

https://eba.europa.eu