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Final report

Guidelines on disclosure requirements under Part Eight of Regulation (EU) No 575/2013

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1. Executive summary

The Basel Committee on Banking Supervision (BCBS) released a revised version of the Pillar 3 framework (RPF) in January 2015. The European Banking Authority (EBA) is issuing own-initiative guidelines to ensure the harmonised and timely implementation of the RPF in the EU. These guidelines do not change the substance of the regulatory disclosures regarding the requirements defined in Part Eight of Regulation (EU) No 575/2013 (the CRR). However, they provide guidance on these disclosures from a presentational aspect.

By introducing more specific guidance and formats for disclosures through the use of tables and templates, the guidelines (following the RPF) represent a significant step towards enhancing the consistency and comparability of institutions' regulatory disclosures in accordance with Part Eight of the CRR.

The EBA has long taken part in initiatives that enhance the comparability and consistency of institutions' Pillar 3 disclosures. With the release of the RPF (whose first application is set for 2016 year-end disclosures), European Union (EU) institutions are facing stronger market pressure to move towards a more harmonised presentation of their disclosures. However, due to the differences between the Basel Pillar 1 framework and the CRR, the RPF presents areas of misalignment with Part Eight of the CRR.

As the RPF cannot be used for disclosures by institutions in substitution of the legally applicable requirements of Part Eight of the CRR, market pressure might—in the absence of action by supervisors—force institutions to provide a double set of disclosures in these areas of misalignment between the CRR and the RPF. In addition, without consistent guidance on how to tailor the content of the RPF to the CRR requirements, different institutions may make different adjustments, which is ultimately likely to undermine the comparability and consistency of disclosures provided by institutions.

As a result, the EBA has drafted own-initiative guidelines in order to allow EU institutions to implement the RPF in a way that is compliant with the requirements of Part Eight of the CRR. These guidelines come as specifications of existing disclosure requirements in the CRR regarding general requirements for disclosures, risk management, scope of application, capital requirements, credit risk, counterparty credit risk (CCR), and market risk. Securitisation (although in the scope of the RPF) was left out at this stage and so were other requirements in Part Eight of the CRR for which there are already delegated or implementing regulations or guidelines (such as own funds and leverage ratio).

The templates (for disclosure formats), tables (for disclosure guidance) and textual guidance items in these guidelines are linked to the CRR as specification of the requirements thereof. The guidelines cannot waive, contradict or supersede the CRR disclosure requirements, which still

apply entirely even in the case of those requirements that are only partially or not specified in these guidelines.

Anchoring these guidelines to the CRR has necessitated the following adjustments compared to RPF tables and templates:

- Adjustments to align to EU specificities—for instance, in terms of exposure classes or concepts used;
- Adjustments to fit with the CRR requirement that tables or templates specify;
- Adjustments to cater for redundancy between the RPF and the CRR requirements.

In addition, the EBA has also provided additional guidance for areas where the RPF lacked clarity and where the EBA has observed different disclosure practices in its regular assessments of Pillar 3 disclosures. Adjustments have also been made to the provision of the EBA Guidelines 2014/14 on the frequency of disclosures in order to incorporate the frequency triptych (annual, semi-annual, quarterly) in the RPF.

In order to facilitate the implementation of the guidelines, whenever possible, the EBA has based adjustments to, and additional guidance for, the RPF on the supervisory reporting frameworks (COREP and FINREP) using information already published under the EBA EU-wide transparency exercises or the good practices publicly identified during its assessment of institutions' Pillar 3 disclosures.

The disclosure requirements in Part Eight of the CRR apply to all institutions meeting the requirements in Articles 6, 10 and 13 of the CRR, with proportionality ensured via the risk profile of institutions and their use of materiality. However, the comprehensiveness of the guidance provided in these guidelines has led the EBA to limit, at this early stage, its scope of application to global systemically important institutions (G-SIIs) and other systemically important institutions (O-SIIs) and to any other institution opted into these guidelines on the basis of a supervisory decision.

This limited scope of application of the guidelines does not waive other institutions from complying with the requirements in Part Eight of the CRR, nor does it waive any institutions from complying with those articles of Part Eight of the CRR that are not covered by the guidelines.

1.1 Next steps

The guidelines will be published on the EBA website and translated into the official EU languages. The deadline for competent authorities to report whether they comply with the guidelines will be 2 months after the publication of the guidelines.

2. Background and rationale

In January 2015, the BCBS released a revised package of the regulatory disclosure requirements (known as the Pillar 3 disclosure requirements) included in the Basel 2 agreement,¹ with the aim of addressing those shortcomings in the comparability and consistency of regulatory disclosures that negatively impact the ability of market participants to compare institutions' levels of risk.² In particular, the RPF focuses on improving the transparency surrounding the use of internal models for calculating risk-weighted assets (RWAs) by introducing more granular disclosure requirements under a tabular format (for qualitative information) and a template format (for quantitative information). These tables and templates are intended to improve the comparability of institutions' disclosures across jurisdictions and over time.

The Pillar 3 disclosure requirements from the Basel framework have been implemented in EU law via Part Eight of the CRR.

The RPF, compared to the current CRR Pillar 3 framework, introduces presentation changes rather than new disclosure requirements.

The RPF starts to apply for disclosures related to year-end 2016. In order to enable European users to benefit from the improvements in terms of comparability and consistency from the RPF and to allow European institutions to be in a position to provide disclosures comparable with their international peers when implementing Part Eight of the CRR, the EBA has decided to issue own-initiative guidelines under Article 16 of Regulation (EU) No 1090/2010 to further specify the disclosure requirements in Part Eight of the CRR.

2.1 The EBA draft guidelines

2.1.1 The need for consistent disclosures at the EU level

The EBA and its predecessor the Committee of European Banking Supervisors (CEBS) have been assessing EU institutions' Pillar 3 disclosures since their first release in 2009 for the 2008 financial year.³ These assessments have led to the conclusion that, although disclosures have tended to improve over time, they remain heterogeneous regarding presentation and the granularity of information disclosed by different institutions. This has a negative impact on the comparability of disclosures.

While part of this heterogeneity is explained by the different business models and risk profiles of institutions (the CRR relies on an embedded proportionality principle that should allow less complex

¹ Standards RPF disclosure requirements (<http://www.bis.org/bcbs/publ/d309.htm>).

² The BCBS noted in particular that 'the existing Pillar 3 framework, even after its market risk and securitisation parts were enhanced in July 2009, failed to promote the identification of a bank's material risks and did not provide sufficient, and sufficiently comparable, information to enable market participants to assess a bank's overall capital adequacy and to compare it with its peers'.

³ All assessments are available here: <http://www.eba.europa.eu/regulation-and-policy/transparency-and-pillar-3/-/topic-documents/m5cbuvPOTdmW/more>.

institutions to comply with the disclosure requirements via less developed and granular information), the lack of comparability among disclosures also stems from a lack of guidance and prescribed formats for published information.

While retaining a non-prescriptive approach for most of its disclosure requirements, the CRR empowered the EBA to foster more consistency in the disclosure format for a limited number of them, following a similar approach adopted in 2012 by the Basel Committee. As a result, the European Commission's (the Commission's) implementing and delegated regulations, as well as the EBA Guidelines (both those mandated by the CRR and those from their own initiative) have been issued since 2013 regarding the content and format of disclosures for:

- Own funds in accordance with Article 437 of the CRR (Commission Implementing Regulation (EU) No 1423/2013);⁴
- Countercyclical buffer in accordance with Article 440 of the CRR (Commission Delegated Regulation (EU) No 2015/1555);⁵
- Leverage ratio in accordance with Article 451 of the CRR (Commission Implementing Regulation (EU) No 2016/200);⁶
- G-SIIs in accordance with Article 441 of the CRR (Commission Delegated Regulation (EU) No 1222/2014 and the EBA Guidelines for the identification of G-SIIs);⁷
- Encumbered and unencumbered assets in accordance with Article 443 of the CRR (the EBA Guidelines on disclosure of encumbered and unencumbered assets);⁸
- Materiality, proprietary and the confidential nature and frequency of disclosures in accordance with Article 432 and Article 433 of the CRR (the EBA Guidelines on materiality,

⁴ Commission Implementing Regulation (EU) No 1423/2013 of 20 December 2013 laying down implementing technical standards (ITS) with regard to the disclosure of own funds requirements for institutions according to Regulation (EU) No 575/2013 of the European Parliament and of the Council (<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1400597718546&uri=CELEX:32013R1423>).

⁵ Commission Delegated Regulation (EU) No 2015/1555 of 28 May 2015 supplementing Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to regulatory technical standards (RTS) for the disclosure of information in relation to the compliance of institutions with the requirement for a countercyclical capital buffer in accordance with Article 440 (http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:JOL_2015_244_R_0001).

⁶ Commission Implementing Regulation (EU) No 2016/200 of 15 February 2016 laying down ITS with regard to disclosure of the leverage ratio for institutions, according to Regulation (EU) No 575/2013 of the European Parliament and of the Council (http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:JOL_2016_039_R_0004).

⁷ Commission Delegated Regulation (EU) No 1222/2014 of 8 October 2014 supplementing Directive 2013/36/EU of the European Parliament and of the Council with regard to RTS for the specification of the methodology for the identification of G-SIIs and for the definition of subcategories of G-SIIs (<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1464026270173&uri=CELEX:32014R1222> and <http://www.eba.europa.eu/documents/10180/1333746/EBA-GL-2016-01+%28Final+report+on+GL+on+G-SII+identification%29.pdf/f3472fbf-64a3-48eb-9676-28ac942c3d5e>).

⁸ <http://www.eba.europa.eu/documents/10180/741903/EBA-GL-2014-03+Guidelines+on+the+disclosure+of+asset+encumbrance.pdf/c65a7f66-9fa5-435b-b843-3476a8b58d66>.

proprietary and confidentiality and on disclosure frequency under Articles 432(1), 432(2) and 433 of the CRR);⁹

- Remuneration (the EBA Guidelines on sound remuneration policies under Articles 74(3) and 75(2) of Directive 2013/36/EU and disclosures under Article 450 of the CRR).¹⁰

In addition, the EBA is currently in the process of publishing final guidelines regarding disclosures on liquidity¹¹ and an enhancement of the disclosures on asset encumbrance.¹²

The development of standardised formats through the above-mentioned ITS and EBA Guidelines has had a positive impact on the consistency and comparability of disclosures. Consistency and comparability remain an issue for disclosure requirements outside the scope of these regulations and the EBA Guidelines.¹³

2.1.2 Objective of the guidelines

The present own-initiative guidelines intend to specify guidance and formats for disclosure requirements from Part Eight of the CRR in areas where these requirements have not already been specified by regulations or the other EBA Guidelines listed above. The guidelines do not replace, waive, contradict or supersede the CRR disclosure requirements. Rather, their objective is to provide institutions with the necessary guidance to comply both with the CRR requirements and the RPF. This will, in turn, maximise the benefits for users due to a standardisation of disclosures at the EU level.

Furthermore, the guidelines are intended to be specifications of the CRR requirements taking into account the RPF, enabling institutions to implement the RPF and, at the same time, comply with the CRR disclosure requirements. In general, tables or templates in the RPF have been linked to an existing requirement in Part Eight of the CRR, which is recalled before any template or table and before any disclosure guidance. The CRR requirements from Part Eight of the CRR for which no guidance or format is provided in these guidelines or for which these guidelines only provide partial specifications continue to apply entirely to institutions.

The guidelines therefore offer institutions with a vade mecum to implement the RPF consistently with the CRR while complying with all the disclosure requirements in Part Eight of the CRR. This vade mecum will enable institutions to make sure that the content from the RPF possibly included in their Pillar 3 reports does not contradict or duplicate the disclosures the CRR requires.

⁹ <http://www.eba.europa.eu/documents/10180/937948/EBA+GL+2014+14+%28Guidelines+on+disclosure%29.pdf/ea55f6be-8d55-4bd4-bc74-ed77466823b9>.

¹⁰ <http://www.eba.europa.eu/documents/10180/1314839/EBA-Guidelines-2015-22+Guidelines+on+Sound+Remuneration+Policies.pdf/1b0f3f99-f913-461a-b3e9-fa0064b1946b>.

¹¹ <http://www.eba.europa.eu/regulation-and-policy/liquidity-risk/guidelines-on-the-lcr-disclosure>.

¹² <http://www.eba.europa.eu/regulation-and-policy/transparency-and-pillar-3/rts-on-the-disclosure-of-encumbered-and-unencumbered-assets>.

¹³ The 2015 EBA assessment of the 2014 Pillar 3 disclosures: 'In general, the development of standardised formats has increased the consistency of the information disclosed in accordance with these formats. Nevertheless, the challenges of consistency and comparability remain for the other disclosure requirements where such standardised formats do not exist, and further improvements are still needed to fully comply with disclosure requirements, especially those newly introduced by the CRR.'

Lastly, these guidelines include references to other regulatory products, so as to provide a comprehensive guide for the implementation of Part Eight of the CRR to institutions that are within its scope.

2.1.3 Scope of the draft guidelines

The guidelines cover the following CRR articles in line with the scope of the RPF (with the exception of the disclosure requirements on securitisation, which are not part of these guidelines):

- General requirements on disclosures (Article 431, Article 432, Article 433, Article 434);
- Disclosure requirements on risk management (Article 435);
- Disclosure requirements on scope of application (Article 436);
- Disclosure requirements on capital requirements (Article 438);
- Disclosure requirements on credit risk (Article 442, Article 444, Article 452)
- Disclosure requirements on credit risk mitigation (CRM) (Article 453);
- Disclosure requirements on CCR (Article 439);
- Disclosure requirements on market risk (Article 445, Article 455).

2.2 Content of the guidelines

2.2.1 Formats for disclosures

The guidelines follow the distinction also applied in the RPF between tables (for qualitative information and, in some instances, quantitative information) and templates (for quantitative information) with different options for institutions to adjust them:

- There are tables and templates with a flexible format, for which the format is only illustrative and institutions are left with flexibility in the implementation provided that they disclose information with a similar level of granularity;
- There are templates with fixed formats, where the possibility of deviating from the presentation of information advised is limited, except in the case of non-applicability or non-materiality of an item of information.

As in the RPF, the fixed format is used for information on capital requirements and RWAs, while other information on risks and qualitative information comes with a flexible format.

The guidelines consist of:

- 10 tables, with flexible formats;
- 38 templates.

The following sections describe the adjustments made to the RPF in more detail. An overview of the specifications of each template, table and textual guidance item is provided in Annex I of the guidelines.

2.2.2 General requirements for disclosures

Section 4.2 of the guidelines implements the RPF principles for disclosures (Section A), the disclosure of non-material, proprietary or confidential information, guidance for the verification of disclosures, the location of disclosures, and the frequency and timing of disclosures (Sections B to E).

a. Principles for disclosures

The principles for disclosures are implemented in accordance with Article 431(1) of the CRR regarding clarity, consistency over time and comparability of disclosures. The principle for the comprehensiveness of disclosures is a requirement from Article 431(3) and is implemented separately from the other Basel principles. The reference to meaningfulness of disclosures is implemented in accordance with Article 432(2) and the 2014 EBA Guidelines on materiality.

b. Verification of disclosures

The guidance regarding the verification of information—which, at a minimum, should have the same level of internal verification as information disclosed as part of the management report—is implemented following the requirement for the verification policy of disclosures in Article 431(3) of the CRR. The guidance is in line with the RPF, save for adjustments to specific EU concepts:

- The management discussion and analysis part of the financial report has become the management report as defined in Directives 2013/34/EU and 2004/109/EC (the accounting and transparency directives);
- The reference to the board of directors or senior management has been replaced by a reference to the management body and senior management as defined in Directive 2013/36/EU, in order to take into account the different governance structures of institutions in the EU.

The guidance regarding verification of disclosures does not replace any more potential stringent requirements that competent authorities may impose regarding the audit of Pillar 3 information.

c. Location of disclosures

The RPF guidance on the location of disclosures is included in the guidelines following the requirements in Article 434 of the CRR. In practice, these specifications frame the freedom of localisation of information that is left to institutions in accordance with Article 434, and specify the signposting requirements included in that article.

Institutions are advised to include, to the extent possible, all the disclosures required by Part Eight of the CRR in a separate document or in a separate and clearly identifiable section of their financial report. In particular, all the disclosures made via fixed templates that are directly related to the calculation of capital requirements should be included within this separate document or section. The

signposting of information is an option, provided that specific elements are included in order to identify the signposted information. In addition, strict conditions in terms of equivalence in presentation and scope of consolidation used in the disclosures are imposed to allow for the signposting of information specified in fixed templates.

These strict conditions aim at ensuring that, in accordance with Article 434 of the CRR, to the extent possible, all information is provided in a single media or location, particularly the information on capital requirements and RWAs for which specifications are introduced via fixed templates.

2.2.3 Timing and frequency of disclosures

The RPF introduces a harmonised frequency for tables and templates:

- Tables (qualitative and quantitative requirements) are to be disclosed annually;
- Templates on linkages between the accounting and regulatory scopes of consolidation and the accounting and regulatory exposure values, as well as on the backtesting of probability of default (PD) under the internal ratings-based (IRB) approach are to be disclosed annually;
- Templates (with flexible and fixed formats) are to be disclosed semi-annually;
- A limited set of templates with a fixed format and a focus on RWA variations and capital requirements are to be disclosed quarterly.

The guidelines adopt the same frequency framework.

The present guidelines do not supersede the requirements in Article 433 of the CRR, which states that the disclosure of information required in Part Eight of the CRR has to take place on an annual basis. Institutions can nevertheless be required by their competent authorities to provide more frequent disclosures in accordance with Article 106 of the CRD IV or assess their need to disclose information more often in accordance with the EBA Guidelines 2014/14.

The current guidelines amend Title V and Title VII of the EBA Guidelines 2014/14 in order to (i) include all institutions identified as G-SIIs or O-SIIs in the scope of the EBA Guidelines 2014/14, and (ii) provide guidance in terms of frequency of disclosures and type of information recommended to be disclosed more frequently depending on whether institutions apply the current guidelines.

The approach is summarised in the table below, and the advised frequency of disclosures depends on whether institutions within the scope of the EBA Guidelines 2014/14 are also:

- Within the scope of the current EBA Guidelines 2016/11;
- Outside the scope of the current EBA Guidelines 2016/11.

Figure 1: Frequency of application of the guidelines

INSTITUTIONS WITHIN THE SCOPE OF THE EBA GL/2014/14 ('FREQUENCY GUIDELINES')			
		Quarterly basis	Semi-annually
Institutions WITHIN the scope of the EBA GL/2016/11 (mandatory application for G-SII/O-SII or supervisory decision for other institutions)	Summary information on own funds as specified in the EBA GL/2014/14	X	
	Summary information on leverage ratio as specified in the EBA GL/2014/14	X	
	Full information on own funds as specified in Commission Implementing Regulation (EU) No 1423/2013		X
	Full information on leverage ratio as specified in Commission Implementing Regulation (EU) No 2016/200		X
	Other information listed in the EBA GL/2016/11	X	X
Institutions OUTSIDE the scope of the EBA GL/2016/11: institutions with consolidated with a leverage ratio exposure above €200 bn	Information on capital adequacy (RWAs and capital requirements) as specified in the EBA GL/2014/14	X	
	Summary information on own funds as specified in the EBA GL/2014/14	X	
	Summary information on leverage ratio as specified in the EBA GL/2014/14	X	
	Information on IRB exposures by internal grade and model parameters		X
	Full information on own funds as specified in Commission Implementing Regulation (EU) No 1423/2013		X
	Full information on leverage ratio as specified in Commission Implementing Regulation (EU) No 2016/201		X
Institutions OUTSIDE the scope of the EBA GL/2016/11: institutions being either one of the three largest institutions in their home jurisdiction, or having EUR 30 billion total consolidated assets or, or having a 4-year average total assets amounting to 20% 4-year average GDP of the home jurisdiction	Summary information on own funds as specified in the EBA GL/2014/14		X
	Summary information on leverage ratio as specified in the EBA GL/2014/14		X
	Information on capital adequacy (RWAs and capital requirements) as specified in the EBA GL/2014/14		X
	Information on IRB exposures by internal grade and model parameters		X

The present guidelines do not change the approach in the EBA Guidelines 2014/14 but update the list of requirements to be considered for more frequent disclosures. They do not make the disclosure of interim information mandatory. In accordance with Article 433 of the CRR, each institution remains responsible for assessing the appropriateness of its chosen frequency of disclosures and its need for disclosing some information from Part Eight of the CRR more frequently than annually. Some institutions are nevertheless particularly advised to pay special attention to the need to disclose a specific set of information more frequently. Simply put, the scope of institutions advised and the set of information eligible for specific consideration have been broadened.

Regarding the timing of disclosures, the guidelines clarify that the current requirement in Article 433 of the CRR on publishing information from Part Eight in conjunction with the date of publication of financial statements does not mean that the publication has to take place on the same date. Though convergence in the date of publication of financial and Pillar 3 information is desirable in the medium term, the publication can occur within reasonable delay. Such a delay cannot exceed any national deadline for publication set in accordance with Article 106 of the CRD IV.

2.2.4 Risk management and governance disclosures

Section 4.3 of the guidelines covers the tables in the RPF on risk management (table OVA), credit risk (table CRA), CCR (table CCRA) and market risk (table MRA). These tables are implemented in these guidelines in accordance with Article 435(1) of the CRR.

Disclosure requirements from Article 435(2) are not covered by the RPF, with the exception of point (e). The EBA nevertheless provides guidance on the requirements in both Article 435(1) and Article 435(2).

2.2.5 Scope of application disclosures

Section 4.4 of the guidelines covers information from the RPF on differences in the scope of consolidation (template LI1), measurement of exposure (template LI2), and additional information on these issues (table LIA). Templates EU LI1 and EU LI2 and Table EU LIA are linked to Article 436(b) of the CRR, and provide different views (at the aggregate level and at the level of measurement of exposures) on the differences in the scope of accounting and regulatory consolidation.

Templates EU LI1 and EU LI2 are identical to those in the RPF, but the guidelines provide supplementary guidance regarding implementation issues:

- Disclosure of items deducted from own funds in EU LI1 and EU LI2;
- Elements that have an impact on the difference in the exposure value between the regulatory and the accounting frameworks (netting, provisions, prudential filters) in Template EU LI2;
- Requirement to quantify the differences originating from (i) deconsolidated entities (separately for insurance entities, securitisation vehicles and other entities), (ii) consolidated entities, (iii) changes in the consolidation method and (iv) changes in the accounting standards used between the accounting and the regulatory consolidations in the accompanying information (Table EU LIA).

The guidelines include an additional template (Template EU LI3) to be disclosed by all entities included within the accounting and the regulatory scopes of consolidation as defined in accordance with the applicable accounting framework and Part One, Title II, Section 2 and Section 3 in the CRR, for which the method of the accounting consolidation is different from the method of the regulatory consolidation. This template is implemented in accordance with Article 436(b).

2.2.6 Capital requirements disclosures

Disclosures on capital requirements and RWAs, specified in template OV1 (for all risks) and template CR10 (for equity exposures) of the RPF, are included in the guidelines following the requirements in Article 438 of the CRR. Indeed, the disclosure of RWAs in addition to the disclosure of capital requirements (as required in Article 438 of the CRR) is one of the good practices that have been observed in institutions' disclosures.

a. Template EU OV1

Template OV1 in the RPF is included in the guidelines in accordance with Article 438(c) to (f) of the CRR. The structure of this template has been aligned as much as possible with COREP template C02 to facilitate disclosure by institutions. Some of the information in this template is added for the purpose of international comparability and following their availability in supervisory reporting:

- **Information on CCR** – Template EU OV1 requires a breakdown of capital requirements along with the methods used to compute the exposure value. While points (c) and (d) of Article 438 of the CRR (when read in conjunction with Article 107 of the CRR) are explicit regarding the breakdown by exposure classes for CCR, they are silent regarding a breakdown by method of computation of the exposure value. Nevertheless, the information on exposure computation methods should be available to institutions as part of information to be disclosed under Article 439(f) of the CRR and information to be reported in COREP for the exposure value subject to CCR.
- **Information on settlement risk** – Template EU OV1 requires the separate disclosure of RWAs and capital requirements on settlement risk. Information on settlement risk is available in COREP C11, covering transactions in the trading book and outside the trading book. This should enable institutions to provide information on settlement risk separately from other risks.
- **Information on amounts below the threshold for deduction** – The unweighted value of these elements is required to be disclosed in rows 72 to 75 of Annex IV and Annex VI of the Commission implementing regulation adopted on the basis of Article 437(2) of the CRR. This information should therefore be available to institutions.
- **Information on the floor adjustments** – Template EU OV1 requires the disclosure of the floor adjustment in a separate row. The intention is to show the impact of any Pillar 1 floor adjustment on total RWAs and total capital. Information on floors is included in COREP template C04.

b. Template EU CR10

Information on the capital requirements on equity exposures under the IRB approach is detailed in Template EU CR10, which provides (in accordance with the last paragraph of Article 438 of the CRR) a breakdown of exposures assigned to each category specified in Article 153(5) of the CRR for specialised lending exposures and to each risk weight mentioned in Article 155(2) of the CRR for equity exposures under the simple risk weight.

In the RPF, Template CR10 has a flexible format and can be adjusted to fit the specificities of the local implementation of the Basel framework. To suit the requirements in Article 438 of the CRR, the RPF template is adjusted in the guidelines as follows:

- There is only one template for all specialised lending exposures, as opposed to separate templates between high volatility commercial real estate (HVCRE) and other than HVCRE, which are not separately referred to in Article 153(5) of the CRR;
- There is only one column for the exposure value of specialised lending exposures, without distinctions between project finance, object finance, commodities finance, and income producing real estate, since these categories are not mentioned in the table in Article 153(5);

- The row breakdown for specialised lending exposures refers to the five categories mentioned in Article 153(5) of the CRR instead of the categories of strong, good, satisfactory, weak and default;
- The breakdown by maturities is applied to all categories, while CR10 applies it to the strong and good categories instead.
- The risk weights are aligned with Article 153(5) of the CRR;
- An extra column has been inserted for the capital requirements for equity exposures under the simple risk-weighted approach, as required under Article 438.

While the last paragraph of Article 438 of the CRR does not require information on expected losses (EL) and RWAs for specialised lending exposures to be disclosed, this information is kept in Template EU CR10 for reasons of international comparability.

c. Non-deducted insurance participations (Template EU INS1)

The EBA decided to design appropriate disclosure requirements for financial conglomerates exercising the option given in Article 49 of the CRR regarding non-deduction of insurance participations from own funds. This follows earlier work by some competent authorities.¹⁴

The disclosures—in accordance with Template EU INS1—are to be provided as part of the information on capital requirements from Article 438(c) and (d), since non-deducted insurance participations are then risk-weighted in accordance with the CRR credit risk framework.

These disclosures bring additional information compared to what is already available to users in the Commission Implementing Regulation (EU) No 1423/2013 regarding deducted participation in entities from the financial sector. The disclosures required in Template EU INS1 make available: (i) the amount of holdings of own funds not deducted as a consequence of using Article 49(1) of the CRR, and (ii) the total risk-weighted exposure amounts associated with those exposures. These disclosures should enable users to easily assess the impact of non-deduction in terms of additional RWAs.

2.2.7 Credit risk and CRM disclosures (general information)

Section 4.8 of the guidelines covers information on credit risk included in table CRB, template CR1 and template CR2 of the RPF, as well as information on CRM included in table CRC and template CR3 of the RPF. This information relates to the general credit risk and CRM, and not information on the regulatory treatments of credit risk. The RPF templates and tables have been implemented in accordance with Article 442 of the CRR (for the disclosures related to credit risk) and Article 453 of the CRR (for the disclosures related to CRM).

¹⁴ See, for instance, the European Central Bank's (ECB's) guide on options and discretions available in EU law, March 2016 (https://www.bankingsupervision.europa.eu/ecb/pub/pdf/ecb_guide_options_discretions.en.pdf), and the EBA Board of Supervisors – Final minutes, December 2015 (<http://www.eba.europa.eu/documents/10180/758169/EBA+BS+2016+001rev1+%28Final+Minutes+BoS+08-09+December+2015%29.pdf>).

a. Scope of disclosures in section 4.8 and the exposure value used

In alignment with the RPF, information on credit risk exposures in Section 4.8 of the guidelines excludes exposures treated under the CCR framework and exposures treated under the securitisation framework. Article 442 and Article 453 of the CRR are silent on whether they may cover securitisation positions or exposures subject to the CCR framework.

Under the RPF, the exposure value before CRM disclosed in the credit risk templates is the regulatory exposure value contained in template LI2, which includes the impact of netting. Accordingly, the guidelines clarify that the exposure value before CRM disclosed in templates in Sections 4.8 to 4.11 also include the impact of netting disclosed in Template EU LI2.

b. Breakdown by exposure class

The disclosure requirements in Article 442 of the CRR include a breakdown of exposures by exposure class, but they do not specify the types of exposure class to be used. The templates in this section refer to the definition of exposure class under Articles 112 and 147 of the CRR, which can be supplemented to provide further details as appropriate and are flexible. For these templates, the guidelines also indicate that institutions should report (at exposure class level) only those exposures that are material according to the EBA Guidelines 2014/14 and they may aggregate the immaterial exposures in one row: 'other'.

c. Guidance and format from the RPF (Templates EU CR1-A-E and EU CR2-A-B)

The RPF Tables CRB and CRC and the RPF Templates CR1, CR2 and CR3 address specific guidance and formats. The corresponding Table EU CRB and Table EU CRC in the guidelines include some additional guidance compared to the RPF. The RPF template CR1 requires the separate disclosure of gross exposures in terms of defaulted and non-defaulted exposures, allowance for impairment, and net exposures. Exposures are broken down by types of instruments (loans, debt securities and off-balance-sheet items). This template is implemented in the guidelines in accordance with the requirements in Article 442(c), (g) and (h) of the CRR (breakdown of exposures by exposure classes and breakdown of past-due and impaired exposures by industry, counterparty and geography). Following the CRR requirements, some adjustments have been made to the template compared to the RPF, in order to take into account the CRR requirements. The main change is that the RPF template CR1 is split into three templates in the guidelines. The first includes the breakdown by exposure classes (Template EU CR1-A), the second includes the breakdown by industry or counterparty breakdown (Template EU CR1-B), and the third template includes geographical breakdown (Template EU CR1-C).

The RPF Template CR2 is implemented through template CR2-A on the reconciliation of changes in the specific and general credit risk adjustments for impaired exposures, which is supplemented with template CR2-B on the reconciliation of defaulted exposures (this is included in accordance with the requirements of Article 442(i) of the CRR).

Template CR3 of the RPF on CRM is implemented following the requirement in Article 453(f) and (g) of the CRR, taking into consideration the instructions provided in the BCBS2016 FAQs regarding this template.

d. Additional guidance compared to the RPF

The guidelines include additional templates with guidance on disclosure requirements under Article 442 of the CRR that are not covered in the Basel RPF but that provide added value according to the EBA Pillar 3 assessments. These extra templates are provided under a flexible format (which allows institutions to tailor their level of granularity or to signpost other similar information disclosed, for instance, in financial statements). In addition, they seek to reuse (to the best extent possible) information already available in supervisory reporting. These templates are the following:

- Template EU CRB-B, with total amount of exposures at the end of the period and on average over the period (Article 442(c) of the CRR);
- Templates EU CRB-C and EU CRB-D, with geographical and sectorial breakdowns of exposures by exposure classes (Article 442(d) and (e) of the CRR). This information is available in COREP templates C09.01 and C09.02 and in FINREP template F06;
- Template EU CRB-E, with the maturity of exposures (Article 442(f) of the CRR);
- Template CR1-D on ageing of past-due exposures;
- Templates on non-performing and forborne exposures (see below).

e. Non-performing and forborne exposures (Template EU CR1-E)

The publication of the EBA EU common definition of non-performing exposures and forbearance in 2013 has not been accompanied by an appropriate level of disclosure by institutions, with important variations still existing among institutions regarding the level of granularity. To improve the level of transparency, these guidelines include a specific template on non-performing and forborne exposures, noting that the BCBS is moving towards definitions of both non-performing exposures and forbearance that are highly consistent with the EBA definitions.

The template in the guidelines merges the information already disclosed as part of the EBA EU-wide transparency exercises, and only adds some information that institutions have already used to report as part of the supervisory reporting (FINREP templates F18 and F19).

2.2.8 Credit risk and CRM disclosures (standardised approach)

Section 4.9 of the guidelines covers information on the use of the standardised approach referred to in table CRD and in templates CR4 and CR5 of the RPF. The table and templates in this section are implemented following the requirements of Articles 444 and Article 453 of the CRR. In particular, the RPF table CRD is implemented in accordance with Article 444(a) to (d) of the CRR through template EU CRD. Template EU CR4 (aligned with the RPF template CR4) includes information in accordance with Article 453(f) and (g) of the CRR.

The RPF template CR5 includes information to be disclosed in the application of Article 444(e) with some adjustments: while the CRR requires the breakdown of exposures by applicable credit quality steps, the RPF requires it by risk-weighted bands. Template EU CR5 in the guidelines accordingly requires a breakdown by all risk-weighted bands that correspond to credit quality steps in the CRR.

All these risk-weighted bands are available in COREP template C07. In addition, template EU CR5 includes a column on deducted exposures, in line with the CRR requirements.

2.2.9 Credit risk and CRM disclosures (the IRB approach)

Section 4.10 of the guidelines covers information on the use of the IRB approach, as referred to in table CRE and in templates CR6, CR7, CR8 and CR9 of the RPF. These templates have been implemented in the guidelines following the requirements in Article 438, Article 452 and Article 453 of the CRR.

a. Qualitative information (table EU CRE)

Table CRE of the RPF is implemented through Template EU CRE of the guidelines following the disclosure requirements of Article 452(a) to (d) of the CRR regarding rating methodologies.

b. Breakdown of model parameters by PD bands (Template EU CR6)

The RPF template CR6 is implemented following the requirements in Article 452(e) of the CRR. The RPF Template CR6 and the corresponding EU CR6 include information (maturity, value adjustments and provisions, original exposure, EL, and number of obligors) that is not required by the CRR; however, according to the EBA assessments of Pillar 3 reports of EU institutions, they are already disclosing this information on a voluntary basis and it is also part of COREP supervisory reporting. The inclusion of this information in Template EU CR6 ensures consistency with the RPF applied by third-country institutions and therefore international comparability.

One of the main improvements of template EU CR6 with regard to disclosures on IRB model parameters is the introduction of a harmonised and fixed PD master scale for the breakdown of exposure values, which introduces consistency compared to a situation where the granularity of such a breakdown greatly varies among institutions. The master scale is set as a minimum required level of granularity, and institutions may provide a more granular breakdown of PD bands if it reflects their risk profile better.

The exposure class breakdown in the template is in line with the disclosure required by the CRR. Nevertheless, for retail exposures, the option included in Article 452(f) of the CRR to provide a breakdown by a minimum relevant number of EL bands instead of the disclosures specified by Template EU CR6 is not superseded by these guidelines.

c. Other quantitative information (Templates EU CR7, EU CR8 and EU CR9)

The RPF template CR7 on the effect of credit derivatives on the IRB RWAs is included in the guidelines following the requirements in Article 453(f) and (g) of the CRR. This article requires separate disclosures on the secured exposures by IRB and standardised exposure classes. The breakdown by exposure class in the template is adjusted to fit the regulatory exposure classes under the IRB approach.

The RPF template CR8 on the reconciliation of the changes for RWAs under the IRB approach is a major improvement that enhances users' understanding of the changes in RWAs and restores confidence in RWA numbers by fostering a better comprehension of the relationship between

internally modelled RWAs and the levels of risk. This template is implemented in the guidelines in accordance with Article 438 of the CRR and also considering Article 92 of the CRR. The template EU CR8 includes an additional column for capital requirements (capital requirements are the focus of Articles 92 and 438 of the CRR).

The RPF Template CR9 is implemented in the guidelines as in the RPF, plus some additional guidance on backtesting of model parameters (particularly PD backtesting).

2.2.10 CCR

Section 4.11 of the guidelines covers the information on CCR included in the RPF templates CCR1 (breakdown of CCR by exposure computation method), CCR2 (breakdown of the credit valuation adjustment (CVA) charge), CCR3 (risk-weighting of CCR under the standardised approach), CCR4 (risk-weighting of CCR exposures under the IRB approach), CCR5 (breakdown of collateral received and posted), CCR6 (credit derivatives exposures), CCR7 (RWA flow statement) and CCR8 (exposures to central counterparties (CCPs)).

The requirements on CCR have been implemented as specifications of the disclosure requirements in Article 438, Article 439, Article 444 and Article 452 of the CRR. The Basel templates are based on the revised CCR framework,¹⁵ which is not expected to apply before the update of the CRR in the EU. Therefore, the corresponding EU templates in the guidelines are adjusted compared to the RPF templates to fit the current CRR CCR framework.

a. Information on regulatory measures (Templates EU CCR1, EU CCR2 and EU CCR8)

The RPF template CCR1 has been implemented as a specification of Article 439(e), (f) and (i) of the CRR. Some adjustments have been applied in EU CCR1 compared to the RPF template in alignment with the CRR framework.

As in the RPF, Template EU CCR1 does not include information on the CVA capital charge and exposures cleared through a CCP. Nevertheless, with the aim that institutions provide a comprehensive view of their exposures with CCR charges and following the requirements in Article 439(e) and (f) of the CRR, Template EU CCR2 on CVA charges and Template EU CCR8 on exposures cleared through CCPs are also implemented.

b. Information by regulatory risk-weighting approaches (Templates EU CCR3, EU CCR4 and EU CCR7)

The RPF templates CCR3 and CCR4 are implemented in accordance with Article 444(e) and Article 452(e) of the CRR. The templates in the guidelines (EU CCR3 and EU CCR4) are aligned in terms of shape and content with credit risk templates EU CR5 and EU CR6.

The RPF Template CCR7 is implemented in accordance with Article 438 and Article 92 of the CRR. A column for capital requirements (which are the focus of the Articles 92 and 438 of the CRR) has been added to template EU CCR7.

¹⁵ The standardised approach for measuring CCR exposures, March 2014: <http://www.bis.org/publ/bcbs279.pdf>.

c. Other information on CCR (Templates EU CCR5 and EU CCR6)

Other information on CCR includes information on collateral received and posted (the RPF template CCR5) and exposures to credit derivatives (the RPF template CCR6).

In accordance with Article 439(e) of the CRR, which requires a breakdown of the fair value of collaterals held in derivative transactions, the guidelines include two templates for the RPF template CCR5: Template EU CCR5-A on the impact of netting and collateral held on the exposure value for derivative and securities financing transactions (SFTs); and Template EU CCR5-B on the composition of collateral for exposures to CCR.

To address financial stability concerns related to the unintended disclosure of the use of emergency liquidity assistance, the format of Template EU CCR5-B has been left fully flexible with regard to both the level of granularity on the types of instruments disclosed and the level of granularity of the operations (SFTs and derivative transactions, which the RPF requires to be separately disclosed).

In addition (and consistently with the approach in the EBA Guidelines 2014/03 regarding information on the encumbrance status of collateral received), a waiver has been introduced: in those cases where central banks undertake liquidity assistance in the form of collateral swap transactions, competent authorities may decide that institutions should not disclose Template EU CCR5-B if this disclosure would allow, now or in the future, the recognition of liquidity assistance provided by central banks via collateral swaps. The waiver by competent authorities should be based on thresholds regarding collateral received and posted, as well as on objective criteria that are publicly disclosed.

Institutions to which the waiver has been applied would still have to disclose Template EU CCR5-A, though without being required to separately identify derivatives and SFTs. Template EU CCR5-A would then act as the minimum standardised information on the impact of collateral on derivative and SFT exposures subject to CCR. To ease the implementation of this template, its format has been left flexible.

Regarding exposures to credit derivatives, Template EU CCR6 is implemented following the requirements in Article 439(g) and (h) of the CRR, with an adjustments (compared to the RPF template) in order to reflect the broader requirement in Article 439(h) (which is the inclusion of a separate column for credit derivatives other than credit derivative hedges).

2.2.11 Market risk

Section 4.13 of the guidelines covers disclosures on market risk, both qualitative (the RPF table MRB) and quantitative (the RPF templates MR1, MR2, MR3 and MR4). These tables and templates are implemented in the guidelines following the requirements in Article 445 and Article 455 of the CRR.

a. Own funds requirements under the standardised approach (Template EU MR1)

The RPF Template MR1 has been implemented with reference to Article 445 of the CRR and is focused on the standardised approach.

b. Qualitative information on the internal models approach (IMA) (Table EU MRB-B)

Information in the RPF template MRB is implemented in the guidelines following the requirements in Article 455.

A couple of guidance items are deleted in the EU MRB template compared to the RPF, in order to avoid overlapping with the CRR requirements. In addition, some guidance was added to facilitate the implementation of the template by the industry.

c. Capital requirements under the IMA (Templates EU MR2-A and MR2-B)

The RPF template MR2 is linked to the disclosure requirements in Article 438 and Article 92 of the CRR and, as for the other templates on RWA reconciliation, a specific column on capital requirements was added. In addition, the inclusion of end-of-period value in this template should facilitate institutions' compliance with the requirements in Article 455(e) of the CRR.

It should be noted that this specific disclosure requirement relates to the disclosure of elements of own funds for market risk under the internal models, and has been so far implemented with varying levels of granularity by institutions. To improve transparency regarding the components of market risk RWAs under the internal models, RPF template MR2 is split between Template EU MR2-A on the different elements on market risk RWAs and Template EU MR2-B on the reconciliation of these RWAs by drivers of changes.

However, the EBA is aware of the issues of implementing Template EU MR2-B when value at risk (VaR) and other values to be reconciled in this template are average values instead of end-of-period values. To address these issues, two rows have been added in the template in order to include the disclosure of RWAs at the end of the quarter and at the end of the previous quarter. These extra rows should ensure that the reconciliation is always performed on the basis of end-of-period (i.e. point-in-time) values, facilitating the implementation of Template EU MR2-B.

Template MR2-A is built considering information available in COREP C24, as well as information already disclosed by institutions as part of the EBA EU-wide transparency exercises. This should facilitate its implementation by institutions.

d. Other quantitative information regarding the IMA (Templates EU MR3 and EU MR4)

This other quantitative information refers to information regarding the end-of-period, maximum, minimum and average values of internal model metrics (VaR, stressed VaR (SVaR), incremental risk charge (IRC), and comprehensive risk measure; the RPF template MR3) and the backtesting of internal models (the RPF template MR4).

These templates are implemented following the CRR requirements in Article 455(d) and (g). Template EU MR3 is unchanged compared to the RPF, save for the value of the floor on CRM that is to be disclosed in Template EU MR2-A instead. Similarly, the only change in Template EU MR4 relates to the deletion of the request for clarification on whether the profit and loss (P&L) value includes fees and commissions, since Article 366(3) of the CRR requires their exclusion from the actual P&L value to be used for backtesting.

Lastly, the guidelines provide additional guidance for the disclosures regarding liquidity horizons in Article 455(f) of the CRR, as disclosure practices vary significantly among institutions according to the EBA assessments of EU institutions' Pillar 3 reports.

2.2.12 Securitisation

Disclosure requirements on securitisation in Article 449 of the CRR—although part of the RPF—are not included in the scope of these guidelines. The RPF includes the following elements on securitisation disclosure requirements, with a narrower scope compared to the CRR:

- Table SEC A, for information on risk management due to securitisation positions;
- Templates SEC 1 and SEC 2, for the outstanding securitisation exposures (retained originated and sponsored exposures, and purchased exposures);
- Templates SEC 3 and SEC 4, for the risk-weighting of exposures and the associated RWAs and capital requirements.

These guidelines do not include the securitisation disclosure requirements envisaged in Article 449 of the CRR in their scope because they are currently under discussion following the finalisation of a revised securitisation framework at the international level. This does not prevent institutions from complying with all the requirements envisaged in Article 449 of the CRR.

2.3 Other issues in the context of the guidelines

2.3.1 Scope of application of the guidelines and proportionality considerations

The current requirements in Part Eight of the CRR apply on an individual or consolidated level and in full or part to every institution that meets the requirements in Article 6, Article 10 and Article 13 of the CRR.

Proportionality is embedded in the CRR in the following manners:

- **Purpose and applicability of the disclosure requirements** – The disclosure requirements in Part Eight of the CRR intend to shed light on the risks faced by institutions and their management in accordance with other parts of the CRR. Smaller, less sophisticated or less complex institutions are expected to have a lower risk profile and therefore will not be subject to all the disclosure requirements. For instance, some disclosure requirements only apply to institutions that use internal models to compute capital requirements and therefore do not apply to less complex institutions that only use standardised approaches;
- **Materiality** – Even for disclosure requirements that are applicable to institutions, the concept of materiality (as specified by the EBA Guidelines 2014/14) allows institutions to tailor the level of details and granularity of their disclosures to focus on elements that are deemed material. Information on immaterial elements as determined by institutions based on the existing EBA Guidelines can be omitted.

- **Differentiated frequency** – As outlined in the section on the frequency of disclosures, while the CRR requires a minimum annual frequency of disclosure for all institutions and leaves them free to determine the need for (and scope of) more frequent disclosures, the EBA Guidelines 2014/14 especially advise a subset of institutions deemed significant for the purpose of disclosures to consider providing a subset of information more frequently.

Without questioning the fact that the disclosure requirements from Part Eight of the CRR are to be applied by all institutions meeting the requirements in the aforementioned articles, the EBA believes that the comprehensive and granular scope of guidance introduced by these guidelines makes it relevant to limit their scope of application to a subset of institutions. At this stage, the EBA proposes defining this subset as follows:

- Institutions identified by competent authorities as G-SIIs as set forth in the Commission Delegated Regulation (EU) No 1222/2014 and any subsequent amendment;
- Institutions identified as O-SIIs in the application of Article 131(3) of Directive 2013/36/EU as specified by the EBA Guidelines 2014/10.

Moreover—in order to cater for the fact that, in any given jurisdiction, this subset may turn too limited to enable users to benefit from the increase in comparability of disclosures as a result of the common guidance and formats—national competent authorities are provided with the possibility of broadening the scope of application for all or part of the guidelines as they see fit.

However, specific sections in the guidelines have a broader scope of application. These sections are additional to the content of the RPF:

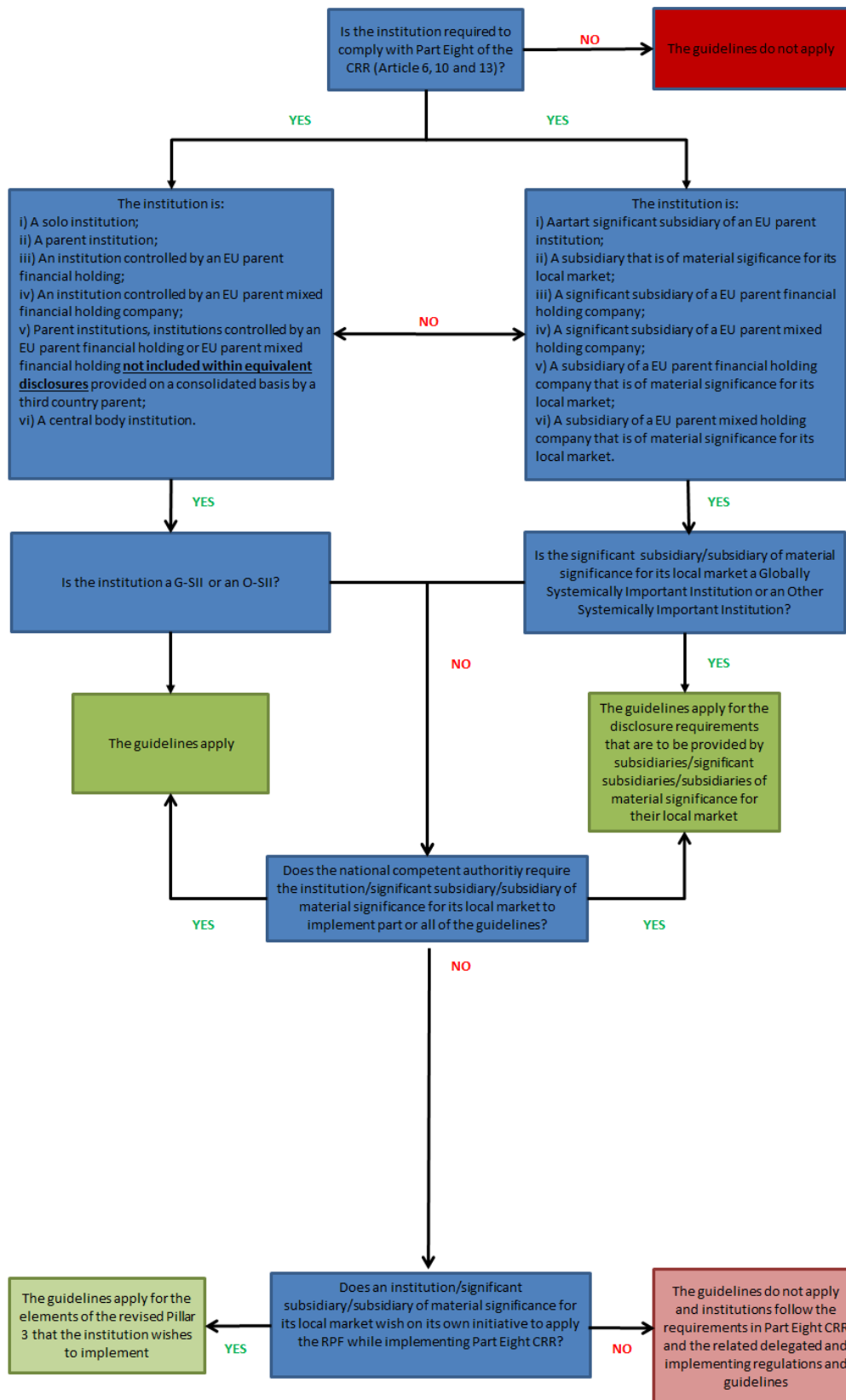
- **Section 4.3 Section C** – Guidance on disclosure requirements for governance arrangements (Article 435(2)). In addition to G-SII and O-SII, this guidance applies to all institutions required to comply with some or all of the disclosure requirements in Part Eight of the CRR;
- **Sections that refer to other existing implementing or delegated regulations and guidelines** – Section 4.2, subsection B and subsection E on materiality, confidentiality and frequency, Section 4.5 on own funds, section 4.7 on macroprudential measures, section 4.12 on unencumbered assets, section 4.14 on remuneration and section 4.15 on leverage ratio apply to all institutions (in order not to create confusion regarding the scope of application of these implementing or delegated regulations and guidelines).

The fact that an institution is outside of the scope of application of these guidelines does not waive its obligation to comply with the requirements in Part Eight of the CRR. In addition, in line with the guidelines' objective to be a vade mecum for the implementation of the RPF in the EU, the EBA emphasises that institutions not expected to implement the guidelines may choose (on a voluntary basis) to do so, particularly when they decide to implement the RPF in their disclosures provided in accordance with Part Eight of the CRR. Indeed, to avoid the burden of double disclosures, the RPF guidance and formats implemented have to be consistent with the CRR requirements, and these guidelines are the only version of the RPF that offers this consistency.

When institutions choose to implement these guidelines on a voluntary basis, they may choose to implement only the parts of these guidelines that are relevant considering their own objectives. For instance, an institution that would like to implement only the templates on linkages in the RPF may choose to implement only the templates on linkages in these guidelines. Annex I provides a mapping between the different templates and tables in the RPF and these guidelines.

The decision tree below illustrates the scope of application of these guidelines.

Figure 2: Decision tree on the scope of application of these guidelines



2.3.2 Availability of information on an editable format

Market discipline works better when reliable information disclosed by institutions is available on a timely basis, is comparable, is disseminated widely and is of easy access for users. On top of this, users of this information also appreciate when the information is provided in a format that facilitates its manipulation so as to easily and swiftly perform calculations and compare the situations of institutions.

Some institutions are already disclosing their quantitative disclosures in an editable format (Excel). In addition, the EBA also makes available on its website (in an editable format) disclosures on G-SII indicators required by the CRR, as well as some information drawn from supervisory reporting as part of its EU-wide transparency exercises.

The EBA acknowledges that the disclosure by institutions of the quantitative information in the scope of these guidelines in an editable format would improve the ability of users to process this information and run their analyses. It thus encourages institutions to do so.

2.4 The EBA's statement on early application of the guidelines

Without prejudice to the application date of these guidelines set out in paragraph 12, in order to ensure a minimum degree of international comparability across institutions pending the implementation of these guidelines in each national competent authority's supervisory procedures, the EBA encourages early adoption of the guidelines by the most significant institutions.

Institutions that, as at 1 January 2016, qualify as G-SIIs in accordance with the Commission Implementing Regulation (EU) No 1030/2014 are encouraged to make every effort to comply with these guidelines from year-end 2016. Competent authorities may advise a broader set of institutions included in the scope of these guidelines (paragraph 7) to make every effort to comply with them from year-end 2016.

Taking into consideration that the revisions brought by the BCBS especially intend to address uncertainty arising from the use of internal approaches and models to calculate risk-weighted exposure amounts and the capital requirements in accordance with Article 92(3) of the CRR, and considering the elements of information that are expected to be already available to these institutions due to the current disclosure requirements in Part Eight of that regulation, G-SIIs and any other institution that has been advised by competent authorities to make every effort to comply with the disclosure guidelines from year-end 2016 are especially encouraged to endeavour to disclose the following specifications from these guidelines by year-end 2016:

- Template EU OV1
- Template EU CR5
- Template EU CR6
- Template EU CR8

- Template EU CCR3
- Template EU CCR4
- Template EU CCR7
- Template EU MR1
- Template EU MR2-A
- Template EU MR2-B

The early implementation of the above-mentioned templates should respect the frequency of the templates: quarterly templates should be published as of December 2016, and March, June and September 2017; and semi-annual templates should be published as of December 2016 and June 2017. Regarding the early implementation of quarterly templates and in those cases where data flow is requested (templates EU CR8, EU CCR7, EU MR2-B), the data flow should only be provided from the beginning of 2017 regarding the first quarter. In templates that require the disclosure of point-in-time data for current and previous reporting periods, the disclosure of point-in-time data for the previous period is not required when the template is disclosed for the first time.

EBA/GL/2016/11

14 December 2016

Guidelines

on disclosure requirements under Part Eight of Regulation (EU) No 575/2013

1. Compliance and reporting obligations

Status of these guidelines

1. This document contains guidelines issued pursuant to Article 16 of Regulation (EU) No 1093/2010.¹⁶ In accordance with Article 16(3) of Regulation (EU) No 1093/2010, competent authorities and financial institutions must make every effort to comply with the guidelines.
2. These guidelines detail the EBA's view on appropriate supervisory practices within the European System of Financial Supervision or on how EU law should be applied in a particular area. Competent authorities (as defined in Article 4(2) of Regulation (EU) No 1093/2010) to whom the guidelines apply should comply by incorporating them into their practices as appropriate (e.g. by amending their legal framework or their supervisory processes), including where the guidelines are directed primarily at institutions.

Reporting requirements

3. According to Article 16(3) of Regulation (EU) No 1093/2010, competent authorities must notify the EBA as to whether they comply or intend to comply with these guidelines, or otherwise with reasons for non-compliance, by ([dd.mm.yyyy]). In the absence of any notification by this deadline, competent authorities will be considered by the EBA to be non-compliant. Notifications should be sent by submitting the form available on the EBA website to compliance@eba.europa.eu with the reference 'EBA/GL/2016/11. Notifications should be submitted by persons with appropriate authority to report compliance on behalf of their competent authorities. Any change in the status of compliance must also be reported to the EBA.
4. Notifications will be published on the EBA website, in line with Article 16(3).

¹⁶ Regulation (EU) No 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority), amending Decision No 716/2009/EC and repealing the Commission Decision 2009/78/EC, (OJ L 331, 15.12.2010, p.12).

2. Subject matter, scope and definitions

Subject matter

5. These guidelines specify the disclosure requirements in Part Eight of Regulation (EU) No 575/2013 (the CRR). These specifications take the form of guidance regarding information that institutions have to disclose in the application of the relevant articles within Part Eight, as well as regarding the presentation of information to be disclosed. However, these guidelines do not alter specifications of disclosure requirements that have already been introduced by implementing or delegated regulation for specific articles in Part Eight of said regulation.
6. The specifications introduced by these guidelines take into consideration the ongoing review of the Pillar 3 framework by the BCBS. These guidelines especially consider the RPF published by the BCBS in January 2015.

Scope of application

7. Except when otherwise provided in paragraph 8 below, these guidelines apply to institutions required to comply with some or all of the disclosure requirements in Part Eight of the CRR, in accordance with Article 6, Article 10 and Article 13 of the same regulation. These institutions meet any of the following criteria:
 - a. The institution has been identified by competent authorities as a G-SII as set forth in the Commission Delegated Regulation (EU) No 1222/2014 and any subsequent amendment;
 - b. The institution has been identified as an O-SII in the application of Article 131(3) of Directive 2013/36/EU as specified by the EBA Guidelines 2014/10.
8. Notwithstanding paragraph 7, the following considerations apply: section 4.2 (general requirements for disclosures), Section B (non-material, proprietary or confidential information) and Section E (timing and frequency of disclosures); section 4.3 (risk management, objectives and policies), Section C (information on governance arrangements); section 4.5 (own funds); section 4.7 (macroprudential supervisory measures); section 4.12 (unencumbered assets); section 4.14 (remuneration) and section 4.15 (leverage ratio) should apply to all institutions required to comply with some or all disclosure requirements in Part Eight of the CRR, including significant subsidiaries and subsidiaries of material significance for their local market for the disclosure requirements that are applicable to them in accordance with Article 13 in the CRR.
9. Competent authorities may require institutions that are neither G-SIIs nor O-SIIs to apply some or all guidance in these guidelines when complying with the requirements in Part Eight of the CRR.

10. The guidelines do not apply in all or in part for an institution that is not referred to in paragraphs 7, 8 or 9 above. This institution remains required to comply with the requirements in Part Eight of the CRR and the related delegated and implementing regulations and the EBA Guidelines. However, such an institution may voluntarily apply some or all of the guidance in the present guidelines. This could be the case when it chooses to use (on its own initiative) the formats and guidance provided by international standards when satisfying some or all of the disclosure requirements in Part Eight of the CRR. Indeed, institutions should ensure that international formats and guidance used comply with the requirements in that regulation and these guidelines offer a compliant version of international standards with the requirements in the CRR.

Addressees

11. These guidelines are addressed to competent authorities as defined in points (i) to (ii) of Article 4(2) of Regulation (EU) No 1093/2010 and to financial institutions as defined in Article 4(1) of Regulation (EU) No 1093/2010.

3. Implementation

Date of application

12. These guidelines apply from 31 December 2017.

Amendments

13. The following guidelines are amended with effect from 31 December 2017: Title V, paragraph 18 and Title VII in the EBA Guidelines 2014/14.

4. Guidelines on disclosure requirements in Part Eight of Regulation (EU) No 575/2013

4.1 Disclosure requirements, guidance and formats

14. These guidelines are not substitutes to the applicable disclosure requirements in Part Eight of the CRR.

15. These guidelines partially or totally specify information required in specific articles in Part Eight of the CRR. The lack of guidance in these guidelines in terms of a specific requirement or sub-requirement in an article in Part Eight does not mean that institutions in the scope of these guidelines, including via supervisory or voluntary decisions, are no longer required to comply with this requirement or sub-requirement.

16. The guidance in these guidelines is provided via tables for qualitative information and via templates for quantitative information, although some tables may include quantitative information as well. Templates come with a flexible or a fixed format while tables come with a flexible format.

17. Where the format of a template is described as fixed:

- a. Institutions should complete the fields in accordance with the instructions given;
- b. Institutions may delete a specific row/column that is not considered to be relevant to their activities or for which the information provided would not be material in the application of Article 432(1) of the CRR as specified by the EBA Guidelines 2014/14. Nevertheless, in this case, institutions (i) should not alter the numbering of the subsequent rows and columns in the template, and (ii) should provide the information mentioned in paragraph 19 of the EBA Guidelines 2014/14;
- c. Institutions may add extra rows and extra columns when necessary to comprehensively convey their risk profile to market participants in the application of Article 431(3) of the CRR, but should not alter the numbering of prescribed rows and columns in the template (see also paragraph 18).

18. Where the format of the table or template is flexible:

- a. Institutions may present the information in a table or a flexible template either in the format provided in this document or in one that better suits them. The format

of the information referred to in a table is not prescribed and institutions may choose the format they prefer for disclosing that information;

- b. Institutions should, in case the format provided in this document is not used, provide information comparable with that required in the table or template. The level of granularity between the institution's own format and the format in these guidelines should be similar.

19. Each template, regardless of its fixed or flexible format, should have its quantitative information supplemented with a narrative commentary to explain (at a minimum) any significant changes between reporting periods and any other issues that management considers to be of interest to market participants.

20. In templates that require the disclosure of data for current and previous reporting periods, the disclosure of data for the previous period is not required when data is being reported for the first time.

21. In the case of one or more rows being added into a template, the new row/rows should keep the same number but with a suffix (for instance, after required row 2, additional rows should be labelled as 2a, 2b, 2c, etc.).

22. In templates that require the disclosure of data for current and previous reporting periods, the previous reporting period is always referred to as the last data disclosed according to the frequency of the template. For instance, in template EU OV1 (which is required with quarterly frequency), the previous period for Q2 disclosure is referred to as Q1, the previous period for Q3 disclosure is referred to as Q2, the previous period for Q4 disclosure is referred to as Q3. In any case, for both current and previous reporting data, the reference date should be provided in the templates.

23. When flow data is required, the templates only include the information in the period after the last disclosure reference date, and not cumulative data (unless otherwise specified for specific templates):

- a. Where quarterly disclosures are provided as at 31 March, institutions should provide information on Q1;
- b. Where quarterly disclosures are provided as at 30 June, institutions should provide information on Q2;
- c. Where semi-annual disclosures are provided as at 30 June, institutions should provide information on H1;
- d. Where semi-annual disclosures are provided as at 31 December, institutions should provide information on H2.

24. The format for the presentation of qualitative information in tables is not prescribed.
25. The guidance in these guidelines, including in terms of presentation, does not intend to limit the ability of institutions to disclose additional information. In the application of Article 431(3), institutions could provide additional information if this is necessary to convey to users their comprehensive risk profile.
26. Additional quantitative information that institutions choose to disclose in addition to the requirements in Part Eight of the CRR, regardless of whether these requirements are specified in these guidelines, should comply with the specifications in Section 4.2 below.
27. The provisions in these guidelines are without prejudice to more stringent requirements that may be set by national competent authorities as part of their supervisory powers conferred upon them by Directive 2013/36/EU or by other relevant European or national legal acts.

4.2 General requirements for disclosures

28. This section specifies the requirements included in Article 431, Article 432, Article 433 and Article 434 of Part Eight in the CRR.

Section A – Principles for disclosure

29. When assessing the appropriateness of their disclosures in the application of Article 431(3) in the CRR, institutions should ensure that their disclosures adhere to the following principles:

- Clarity
- Meaningfulness
- Consistency over time
- Comparability across institutions

30. Disclosures should be clear. Clear disclosures have the following characteristics:

- Disclosures should be presented in a form that is understandable to key stakeholders (such as investors, analysts, financial customers and others);
- Important messages should be highlighted and easy to find;
- Complex issues should be explained in a simple language with important terms defined;
- Related risk information should be presented together.

31. In order to ensure that users can easily find disclosures required by Part Eight of the CRR, institutions should disclose (at the beginning of the single medium or location referred to in

paragraph 39 below) a disclosure index in a tabular format that provides information on where (in the different publications by institutions) information required by the different articles in Part Eight of that regulation can be found.

32. Disclosures should be meaningful to users. Disclosures should highlight an institution's most significant current and emerging risks and how those risks are managed, including information that is likely to receive market attention. Where they enhance the meaningfulness of disclosures, linkages must be provided to line items on the balance sheet or the income statement. Achieving meaningful disclosures should come as a consequence of the implementation of the requirements given in Article 432 of the CRR on non-material information, as specified in the EBA Guidelines 2014/14.

33. Disclosures should be consistent over time to enable key stakeholders to identify trends in an institution's risk profile across all significant aspects of its business. Additions, deletions and other important changes in disclosures from previous reports—including those arising from an institution's specific, regulatory or market developments—should be highlighted and explained.

34. Disclosures should be comparable across institutions. Their level of detail and presentation formats should enable key stakeholders to perform meaningful comparisons of business activities, prudential metrics, risks and risk management between institutions and across jurisdictions.

35. Comprehensive disclosures as defined by Article 431(3) of the CRR should possess the following characteristics:

- Disclosures should describe the main activities and all significant risks of an institution, supported by relevant underlying data and information. Significant changes in risk exposures between reporting periods should be described, together with the appropriate response by senior management or the management body;
- Disclosures should provide sufficient information in both qualitative and quantitative terms on an institution's processes and procedures for identifying, measuring and managing those risks. The level of detail of such disclosure should be proportionate to an institution's complexity;
- Approaches to disclosure should be sufficiently flexible to reflect how senior management and the management body internally assess and manage risks and strategy, thus helping users to better understand an institution's risk tolerance/appetite.

Section B – Non-material, proprietary or confidential information

36. For the application of Article 432 in Part Eight of the CRR, institutions should refer to the guidance included in Title I to IV and Title VI in the EBA Guidelines 2014/14 on materiality,

proprietary and confidentiality, and on disclosure frequency under Articles 432(1), 432(2) and 433 of the CRR.

Section C – Verification of disclosures

37. In the application of Article 431(3), subparagraph 1 and Article 434(1) in Part Eight of the CRR, institutions should have a policy on the verification of disclosures. As part of this policy, institution should ensure that the information required to be disclosed by Part Eight of the CRR is subject (at a minimum) to the same level of internal review and internal control processes as the other information provided by institutions for their financial reporting. Therefore, the level of verification for information required to be disclosed by Part Eight of the CRR should (at a minimum) be the same as for information provided within the management report as part of the financial report (within the respective meanings of Article 19 of Directive 2013/34 and Article 4 and Article 5 of Directive 2004/109/EC).

38. The formal policy adopted in the application of Article 431(3) to comply with the disclosure requirements in Part Eight of the CRR should set out the internal controls and procedures for the disclosure of such information. The key elements of this policy should be described in the year-end report provided according to Part Eight of the CRR or should be cross-referenced to another location where they are available. The management body and senior management are responsible for establishing and maintaining an effective internal control structure over the institution's disclosures, including disclosures provided according to Part Eight of the CRR. They should also ensure that an appropriate review of the disclosures takes place. One or more senior management officers of an institution and one or more members of the management body of an institution should attest in writing that the disclosures provided according to Part Eight of the CRR have been prepared in accordance with the internal control processes agreed upon at the management body level.

Section D – Disclosure location and signposting

39. In application of Article 434 in Part Eight of the CRR, when choosing the appropriate medium and location for disclosures required in that regulation, institutions should provide all disclosures required by Part Eight in one medium or location (to the degree feasible). This single medium or location should be a stand-alone document that provides a readily accessible source of prudential measures for users. This stand-alone document may take the form of a discrete section included in, or appended to, an institution's financial report. In such a case, it should be easily identifiable to users.

40. The requirement in Article 434 of Part Eight in the CRR for institutions to provide (to the degree feasible) all disclosures in one medium or location applies to all disclosure specified in these guidelines, regardless of whether the specifications take the form of fixed or flexible templates. Notwithstanding this, institutions should make every effort to include all templates with a fixed format in the same medium or location without signposting.

41. However, when (in accordance with Article 434) institutions choose to disclose information required by Part Eight of the CRR—including the tables and templates specified by these guidelines—in more than one medium or location, institutions should signpost clearly where the disclosure requirements have been published. This signposting in the report provided according to Part Eight of the CRR should include:

- The title and number of the disclosure requirement;
- The full name of the separate document in which the disclosure requirement has been published;
- A web link, where relevant;
- The page and paragraph number of the separate document where the disclosure requirements can be located.

42. When signposting templates with a fixed format specified in these guidelines outside the single medium or location referred to in paragraph 39 above, institutions should ensure the following:

- The information contained in the signposted document is equivalent in terms of presentation and content to that required in the fixed template and allows users to make meaningful comparisons with information provided by institutions disclosing the fixed format templates;
- The information contained in the signposted document is based on the same scope of consolidation as the one used in the disclosure requirement;
- The disclosure in the signposted document is mandatory.

43. When making use of signposting, institutions should ensure that the signposted information provided according to Part Eight of the CRR benefits from a level of verification that is equivalent to, or greater than, the minimum internal verification level described in paragraph 37.

44. Institutions or competent authorities may also make available on their websites an archive of information required to be disclosed in the application of Part Eight of the CRR and that is related to previous periods. This archive should be kept accessible for a suitable period of time no less than the storage period set by national law for information included in the financial reports (as defined in Article 4 and Article 5 in Directive 2004/109/EC).

Section E – Timing and frequency of disclosures

45. Article 433 in the CRR requires information listed in Part Eight of the same regulation to be published in conjunction with the date of publication of financial statements. While

institutions should ensure that the publication date of the financial statements and the information required by Part Eight of the CRR are only a reasonable period of time apart from each other and should strive to make these dates even closer, the CRR does not require the financial statements and the information listed in Part Eight of that regulation to be published on the very same day. This reasonable delay should be compliant with any deadline for publication set by national competent authorities in the application of Article 106 in Directive 2013/36/EU.

46. Title V, paragraph 18 and Title VII in the EBA Guidelines 2014/14 on materiality, proprietary and confidentiality and on disclosure frequency under Articles 432(1), 432(2) and 433 of the CRR are modified as follows.

Title V – Considerations regarding the need to assess the disclosure of information more frequently than annually

18. Despite the fact that all institutions are required to assess the need to provide more frequent disclosures using any relevant assessment tool within the framework of the elements referred to in Article 433 of the CRR, institutions should especially assess their need to publish information more frequently than annually when one of the following indicators applies to them:

- a) The institution is one of the three largest institutions in its home Member State;*
- b) The institution's consolidated assets exceed EUR 30 billion;*
- c) The institution's 4-year average of total assets exceeds 20% of the 4-year average of its home Member State's GDP;*
- d) The institution has consolidated exposures as per Article 429 of the CRR exceeding EUR 200 billion or the equivalent in foreign currency using the reference exchange rate published by the European Central Bank applicable at the financial year end;*
- e) The institution has been identified by competent authorities as a global systemically important institution (G-SII) as set forth in the Commission Delegated Regulation (EU) No 1222/2014 and any subsequent amendment, or as an other systemically important institution (O-SII) in the application of Article 131(3) of Directive 2013/36/EU as specified by EBA Guidelines 2014.*

Title VII – Disclosures to be provided more frequently than annually

23. Even though it is up to each institution to decide on the type of information and level of detail to disclose to ensure the effective communication of knowledge about their business and risk profile, institutions meeting one of the indicators specified in paragraph 18 and required to comply with the obligations specified in Part Eight of the CRR should pay particular attention to the possible need to provide the information listed in these guidelines more frequently than annually.

24. The type, format and frequency of information that institutions meeting one of the indicators specified in paragraph 18 should pay particular attention to the possible need of providing more

frequently than annually depend on whether those institutions are also identified as G-SIIs or as O-SIIs and whether they are within the scope of application of the EBA Guidelines 2016/11.

25. Institutions meeting one of the indicators specified in paragraph 18 (a) to (d) but are not identified as either G-SIIs or as O-SIIs and are not within the scope of application of the EBA GL/2016/11 should pay particular attention to the possible need of providing the following information more frequently than annually:

a) information on own funds and relevant ratios as required by Article 437 and Article 492, as applicable, of the CRR, especially the following information (as defined in the appropriate rows of Annexes IV and V of the Commission Implementing Regulation (EU) No 1423/2013 of 20 December 2013):

i. Total amount of Common Equity Tier 1 capital, as in rows 6 and 29;

ii. Total amount of Additional Tier 1, as in rows 36 and 44;

iii. Total amount of Tier 1 capital, as in row 45;

iv. Total amount of Tier 2 capital, as in rows 51 and 58;

v. Total amount of capital, as in row 59;

vi. Total regulatory adjustments to each capital aggregate, as in rows 28, 43 and 57;

vii. Common Equity Tier 1 ratio, as in row 61;

viii. Tier 1 ratio, as in row 62;

ix. Total capital ratio, as in row 63.

b) information required by points (c) to (f) in Article 438 of the CRR:

i. the amounts of risk-weighted assets and capital requirements by type of risks specified in Article 92(3) of the CRR;

ii. The amounts of risk-weighted assets and capital requirements by type of risks specified in Article 92(3) of the CRR and by the exposure classes referred to in Article 438 of the same regulation;

c) Information on the leverage ratio as required by Article 451 of the CRR, especially the following information (as defined in the appropriate rows of Annex I of the Commission Implementing Regulation (EU) No 2016/200):

i. Amount of Tier 1 capital used as a numerator as in row 20, with the specification required in row EU-23;

ii. Amount of total exposure used as a denominator as in row 21;

iii. Resulting leverage ratio as in rows 22.

d) Information on risk exposures, especially quantitative information on internal models as required by Article 452(d), (e) and (f) of the CRR, separately for exposures for which institutions use own estimates of loss given default or conversion factors for the calculation of risk-weighted exposure amounts and for exposures for which they do not use such estimates;

e) Information on other items prone to rapid changes and on those items covered by Part Eight of the CRR that have experienced highly significant changes during the reporting period.

26. For institutions referred to in paragraph 25, the frequency of disclosure should depend on the criteria in paragraph 18 that those institutions meet:

a) Institutions meeting the indicator in point d) of paragraph 18 should pay particular attention to the possible need for disclosing:

i. Information listed in points a), b)i, c) and e) of paragraph 25 on a quarterly basis;

ii. Information listed in point d) and b)ii of paragraph 25 on a semi-annual basis;

iii. The full set of information required by the Commission Implementing Regulation (EU) No 1423/2013 on the disclosure of own funds requirements and the Commission Implementing Regulation (EU) No 2016/200 on the disclosure of the leverage ratio¹⁷ on a semi-annual basis.

b) Institutions meeting one of the indicators listed in points a) to c) of paragraph 18 should pay particular attention to the possible need for disclosing information listed in points a), b)ii and c) to e) of paragraph 25 on a semi-annual basis.

27. Institutions required to comply with the obligations specified in Part Eight of the CRR and identified as G-SIIs or as O-SIIs or within the scope of application of the EBA Guidelines 2016/11 should pay particular attention to the possible need to provide more frequently than annually:

a) Information on own funds as referred to in paragraph 25(a), with a quarterly frequency;

b) Information on leverage ratio as referred to in paragraph 25(c), with a quarterly frequency;

c) The full set of information required by the Commission Implementing Regulation (EU) No 1423/2013 and the Commission Implementing Regulation (EU) No 2016/200, on a semi-annual basis;

d) Other information listed in the guidance in the EBA Guidelines 2016/11, with the applicable frequency, and particularly:

i. Information in Article 438 points (c) to (f), as specified in templates EU OV1, EU CR8, EU CCR7, and EU MR2-B;

ii. Information on risk exposures, as specified in templates EU CR5, EU CR6 and EU MR2-A.

e) Information on other items prone to rapid changes.

¹⁷ Update: The reference to the Commission Implementing Regulation (EU) No 2016/200 on the disclosure of the leverage ratio has replaced the reference to the draft ITS that was included in the original version.

28. Institutions should provide additional interim information to those listed in paragraph 25 and paragraph 27 when the result of their assessment for the need to provide disclosures in Part Eight of the CRR more frequently than annually shows that this additional information is necessary to convey their comprehensive risk profile to market participants.

29. Interim information disclosed by institutions in accordance with paragraph 25, paragraph 27 and paragraph 28 should be consistent and comparable over time.

30. The information on own funds and leverage ratio listed in points a) and c) of paragraph 25 and in points a) and b) of paragraph 27 should be disclosed following the formats specified in the Commission Implementing Regulation (EU) No 1423/2013 and the Commission Implementing Regulation (EU) No 2016/200 respectively.

31. The information in paragraph 25, paragraph 27 and paragraph 28 should be published in conjunction with the date of publication of the interim financial statements or information, as applicable. The requirements in Article 434 of the CRR should apply (making only the necessary changes) to the information in paragraph 25, paragraph 27 and paragraph 28 where relevant, taking into consideration the guidance in the EBA Guidelines 2016/11.

32. Independent of whether they are identified as G-SIIs or O-SIIs or are within the scope of application of the EBA Guidelines 2016/11, when institutions meeting at least one of the indicators listed in paragraph 18 choose not to provide one or more of the disclosures listed in paragraph 25 or paragraph 27 more frequently than annually, they should state this fact (at the minimum) in the annual release of the document containing the disclosures as required by Part Eight of the CRR and provide information on how they have arrived at their decision.

4.3 Risk management, objectives and policies

47. This point specifies the requirements included in Article 435 of Part Eight in the CRR.

Section A – General information on risk management, objectives and policies

48. Disclosures required by Article 435(1) and specified in table EU OVA should be provided for each separate category of risk that is materially relevant (as determined in accordance with the EBA Guidelines 2014/14, including those covered in the CRR). Disclosures should cover all risk types and business lines, including new products/markets.

49. To that purpose, institutions included in paragraph 7 of these guidelines should disclose information on their risk management objectives and policies for the following risks where material for the institution:

- Reputational risk;
- Any specific objectives and policies set out for the subcategory of operational risks that are related to conduct, including risks related to the mis-selling of products.

Table 1: EU OVA – Institution risk management approach

Purpose: Description of the institution’s risk strategy and how the risk management function and the management body assess and manage risks and set limits, enabling users to gain a clear understanding of the institution’s risk tolerance/appetite in relation to its main activities and all significant risks.
Scope of application: The table is mandatory for all institutions included in paragraph 7 of these guidelines.
Content: Qualitative information
Frequency: Annual
Format: Flexible

Institutions should describe their risk management objectives and policies, particularly:

Article 435(1)(f)	(a)	<p>The concise risk statement approved by the management body in the application of Article 435(1)(f) should describe how the business model determines and interacts with the overall risk profile—for instance, the key risks related to the business model and how each of these risks is reflected and described in the risk disclosures, or how the risk profile of the institution interacts with the risk tolerance approved by the management body.</p> <p>Within the risk statement in the application of Article 435(1)(f), institutions should also disclose the nature, extent, purpose and economic substance of material transactions within the group, affiliates and related parties. The disclosure should be limited to transactions that have a material impact on the risk profile of the institution (including reputational risk) or the distribution of risks within the group.</p>
Article 435(1)(b)	(b)	<p>Information to be disclosed in the application of Article 435(1)(b) includes the risk governance structure for each type of risk: responsibilities attributed throughout the institution (including, where relevant, oversight and delegation of authority and breakdown of responsibilities between the management body, the business lines and the risk management function by type of risk, business unit, and other relevant information); relationships between the bodies and functions involved in risk management processes (including, as appropriate, the management body, risk committee, risk management function, compliance function, internal audit function); and the organisational and internal control procedures.</p> <p>When disclosing the structure and organisation of the relevant risk management function, institutions should complement the disclosure with the following information:</p> <ul style="list-style-type: none"> • Information on the overall internal control framework and how its control functions are organised (authority, resources, statute, independence), the major tasks they perform, and any actual and planned material changes to these functions; • The approved limits of risks to which the institution is exposed; • Changes of the heads of internal control, risk management, compliance and internal audit.
Article 435(1)(b)	(c)	<p>As part of information on the other appropriate arrangements for the risk management function in accordance with Article 435(1)(b), the following should be disclosed: channels to communicate, decline and enforce the risk culture within the institution (for instance, whether there are codes of conduct, manuals containing operating limits or procedures to treat violations or breaches of risk thresholds or procedures to raise and share risk issues between business lines and risk functions).</p>
Article 435(1)(c) Article 435(2)(e)	(d)	<p>As part of the disclosures required in Articles 435(1)(c) and 435(2)(e), institutions should disclose the scope and nature of risk reporting and/or measurement systems and the description of the flow on risk to the management body and senior management.</p>

Article 435(1)(c)	(e)	When providing information on the main features of risk reporting and measurement systems in the application of Article 435(1)(c), institutions should disclose their policies regarding systematic and regular reviews of risk management strategies, and the periodical assessment of their effectiveness.
Article 435(1)(a)	(f)	Disclosure on the strategies and processes to manage risk in the application of Article 435(1)(a) should include qualitative information on stress testing, such as the portfolios subject to stress testing, scenarios adopted and methodologies used, and the use of stress testing in risk management.
Article 435(1)(a) and (d)	(g)	Institutions should provide information on the strategies and processes to manage, hedge and mitigate risks, as well as on the monitoring of the effectiveness of hedges and mitigants in accordance with Article 435(1)(a) and (d) for risks that arise from the institutions' business model.

Section B – Information on risk management, objectives and policies by category of risks

50. In the application of Article 435(1) of the CRR, institutions should disclose information for each separate category of risks, including credit risk, CCR and market risk, for which disclosure guidance is provided in this section.

51. To that purpose, institutions should provide disclosures on risk management objectives and policies for each type of material risk they are disclosing information on in accordance with the aforementioned Article 435(1) and with paragraph 47 of these guidelines.

52. Specifically for credit risk, institutions should provide the following information specified in Table EU CRA below as part of the disclosures required by Article 435(1):

Table 2: EU CRA – General qualitative information about credit risk

Purpose: Describe the main characteristics and elements of credit risk management (business model and credit risk profile, organisation and functions involved in credit risk management, risk management reporting).
Scope of application: The table is mandatory for all institutions included in paragraph 7 of these guidelines.
Content: Qualitative information
Frequency: Annual
Format: Flexible

Institutions should describe their risk management objectives and policies for credit risk by providing the following information:

Article 435(1)(f)	(a)	In the concise risk statement in accordance with Article 435(1)(f), how the business model translates into the components of the institution's credit risk profile.
Article 435(1)(a) and (d)	(b)	When discussing their strategies and processes to manage credit risk and the policies for hedging and mitigating that risk in accordance with Article 435(1)(a) and (d), the criteria and approach used for defining the credit risk management policy and for setting credit risk limits.
Article 435(1)(b)	(c)	When informing on the structure and organisation of the risk management function in accordance with Article 435(1)(b), the structure and organisation of the credit risk management and control function.

Article 435(1)(b)	(d)	When informing on the authority, status and other arrangements for the risk management function in accordance with Article 435(1)(b), the relationships between credit risk management, risk control, compliance and internal audit functions.
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53. For CCR, institutions should provide the following information specified in Table EU CCRA below regarding the institution's approach to CCR as referred to in Part Three, Title II, Chapter 6.

Table 3: EU CCRA – Qualitative disclosure requirements related to CCR

Purpose: Describe the main characteristics of CCR management regarding, among others, operating limits, use of guarantees and other CRM techniques, and the impact of own credit downgrading.
Scope of application: The table is mandatory for all institutions included in paragraph 7 of these guidelines.
Content: Qualitative information
Frequency: Annual
Format: Flexible

Institutions should provide:

Article 435(1)(a)	(a)	Risk management objectives and policies related to CCR, including:
Article 439 (a)	(b)	The method used to assign the operating limits defined in terms of internal capital for counterparty credit exposures;
Article 439(b)	(c)	Policies relating to guarantees and other risk mitigants and assessments concerning counterparty risk;
Article 439 (c)	(d)	Policies with respect to wrong-way risk exposures;
Article 439(d)	(e)	The impact in terms of the amount of collateral that the institution would be required to provide given a credit rating downgrade.

54. For market risk, institutions should provide the following information specified in Table EU MRA below.

Table 4: EU MRA – Qualitative disclosure requirements related to market risk

Purpose: Provide a description of the risk management objectives and policies concerning market risk.
Scope of application: The table is mandatory for all institutions included in paragraph 7 of these guidelines that are subject to a market risk capital requirement for their trading activities.
Content: Qualitative information
Frequency: Annual
Format: Flexible

Institutions should describe their risk management objectives and policies for market risk according to the framework below (the granularity of the information should support the provision of meaningful information to users).

Article 435(1)(a)	(a)	The disclosure on strategies and processes of the institution to manage market risk, as well as on the policies to hedge and mitigate market risk, in the application of Article 435(1)(a) and (d) should
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(d)		include an explanation of management’s strategic objectives in undertaking trading activities, as well as the processes implemented to identify, measure, monitor and control the institution’s market risks (including policies for hedging risk and strategies/processes for monitoring the continuing effectiveness of hedges).
Article 435(1)(b)	(b)	As part of the disclosures required in Article 435(1)(b) on the structure and organisation of the market risk management function, institutions should disclose a description of the market risk governance structure established to implement the strategies and processes of the institution discussed in row (a) above, and that describes the relationships and the communication mechanisms between the different parties involved in market risk management.
Article 455(c) related to Article 104	(c)	As part of the disclosures required in Articles 435(1)(a) and (c) as well as in Article 455(c), institutions should provide a description of the procedures and systems implemented for the assurance of tradability of the positions included in the trading book in order to comply with the requirements of Article 104. The disclosure should include a description of the methodology used to ensure that the policies and procedures implemented for the overall management of the trading book are appropriate.

55. For liquidity risk, institutions should refer to the EBA Guidelines on LCR disclosure to complement the disclosure of liquidity risk management (EBA/GL/2017/01)¹⁸.

Section C – Information on governance arrangements

56. In the application of Article 435(2), institutions required to comply with some or all of the disclosure requirements in Part Eight of the CRR—in accordance with Article 6, Article 10 and Article 13 of the same regulation—should disclose the following information specified in paragraphs 57 to 59.

57. When disclosing the number of directorships held by members of the management body in accordance with Article 435(2)(a), the following specifications apply:

- Significant institutions should disclose the number of directorships as counted under Article 91(3) and (4) of Directive 2013/36/EU;
- Institutions should disclose the number of directorships effectively held for each member of the management body (whether it is a group company or not, a qualifying holding or an institution within the same institutional protection scheme and whether the directorship is an executive or non-executive directorship) regardless of whether the directorship is with an entity that pursues or does not pursue a commercial objective;
- Where an additional directorship was approved by the competent authority, all institutions in which this member holds a directorship should disclose this fact together with the name of the competent authority approving the additional directorship.

¹⁸ Update: The reference to the “EBA Guidelines on LCR disclosure to complement the disclosure of liquidity risk management (EBA/GL/2017/01)” has replaced the reference to the “EBA Consultation Paper 2016/06, on draft guidelines on liquidity risk disclosures, released for consultation on 11 May 2016”.

58. When disclosing information regarding the recruitment policy for the selection of members of the management body (including the policy possibly resulting from succession planning in accordance with Article 435(2)(b)), institutions should disclose foreseeable changes within the overall composition of the management body.
59. When disclosing their diversity policy in accordance with Article 435(2)(c), institutions should disclose the policy on gender diversity. This includes: where a target has been set for the underrepresented gender and for the policies regarding diversity in terms of age, educational background, professional background and geographical provenance; when a target has been set; the target set; and the extent to which the targets are met. Where a target is not met, institutions should disclose the reasons and, as the case may be, the measures taken to meet the target within a certain time period.
60. As part of data on the information flow on risk to the management body in the application of Article 435(2)(e), institutions should describe the process of the risk reporting provided to the management body, particularly the frequency, scope and main content of risk exposure and how the management body was involved in defining the content to be reported.

4.4 Information on the scope of application of the regulatory framework

61. This point specifies the requirements included in Article 436 of Part Eight in the CRR regarding the scope of application of Part Eight.
62. In the application of Article 436(b), institutions should disclose an outline of the difference in the basis of consolidation for accounting and prudential purposes. Institutions should first provide this outline at the level of the consolidated group, following the specifications in Template EU LI1 below.
63. The breakdown of the differences in the scope of consolidation on an aggregated basis should then be accompanied by a description of the differences in the scope of consolidation at the level of each entity. This detailing of the differences at the entity level should take the form of the descriptions and explanations required by Article 436(b), with the specifications introduced by Template EU LI3.
64. Information on the scope of application of the regulatory framework at the aggregated group level and at the entity level (to be disclosed in accordance with Article 436(b)) should be supplemented by a description of the differences between the financial statements' carrying value amounts under the regulatory scope of consolidation and the exposure amounts used for regulatory purposes. Template EU LI2 should be disclosed for this purpose.

Template 1: EU LI1 – Differences between accounting and regulatory scopes of consolidation and the mapping of financial statement categories with regulatory risk categories

<p>Purpose: Columns (a) and (b) enable users to identify the differences between the scope of accounting consolidation and the scope of regulatory consolidation that applies for the purpose of providing the information required in Part Eight of the CRR. Columns (c) to (g) break down how the amounts disclosed in column (b)—which correspond to the amounts reported in institutions' financial statements (rows) once the regulatory scope of consolidation is applied—are to be allocated to the different risk frameworks laid out in Part Three of the CRR. The sum of amounts disclosed in columns (c) to (g) may not equal the amounts disclosed in column (b), as some items may be subject to capital requirements for more than one risk framework listed in Part Three of said regulation.</p>
<p>Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines. For institutions that are not required to publish consolidated financial statements, only columns (b) to (g) should be disclosed.</p>
<p>Content: Carrying values. In this template, carrying values are the values reported in financial statements.</p>
<p>Frequency: Annual</p>
<p>Format: Flexible, although the row structure should align with the presentation of the institution's balance sheet in its latest annual financial statements.</p>
<p>Accompanying narrative: Institutions should notably supplement Template EU LI1 with the qualitative information specified in table LIA. Institutions are expected to provide qualitative explanations on assets and liabilities that are subject to capital requirements for more than one risk framework listed in Part Three of the CRR.</p>

	a	b	c	d	e	f	g
	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Carrying values of items				Not subject to capital requirements or subject to deduction from capital
			Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	
Assets							
Cash and balances at central banks							
Items in the course of collection from other banks							
Trading portfolio assets							
Financial assets designated at fair value							
Derivative financial instruments							

Loans and advances to banks							
Loans and advances to customers							
Reverse repurchase agreements and other similar secured lending							
Available-for-sale financial investments							
....							
Total assets							
Liabilities							
Deposits from banks							
Items in the course of collection due to other banks							
Customer accounts							
Repurchase agreements and other similar secured borrowings							
Trading portfolio liabilities							
Financial liabilities designated at fair value							
Derivative financial instruments							
....							
Total liabilities							

Definitions**Rows**

The row structure should be the same as the row structure of the balance sheet used in the latest available financial reporting of the institution. When template EU LI1 is disclosed on an annual basis, 'financial reporting' refers to the annual individual and consolidated financial statements defined in Article 4 and Article 24 of Directive 2013/34/EU, as well as (when applicable) to the financial statements in the meaning of the international accounting standards as endorsed in the EU in the application of Regulation (EC) No 1606/2002. When institutions choose—in the application of Article 433 of the CRR—to disclose template LI1 on a more frequent basis, 'financial reporting' refers to the interim individual or consolidated financial information published by institutions, including when this information does not qualify as financial statements in the application of Directive 2013/34/EU or the international accounting standards as endorsed in the EU.

Columns

Carrying values as reported in published financial statements: The amount reported on the asset side and the liabilities side of the balance sheet established following the consolidation requirements in the applicable accounting framework, including frameworks based on Directive 2013/34/EU, 86/635/EEC, or the international accounting standards as endorsed in the EU.

Carrying values under the scope of regulatory consolidation: The amount reported on the asset side and the liabilities side of the balance sheet established following the regulatory consolidation requirements in Part One, Title II, Section 2 and Section 3 of the CRR.

If a credit institution's scope of accounting consolidation and its scope of regulatory consolidation are exactly the same, columns (a) and (b) should be merged.

The breakdown of carrying amounts under the regulatory scope of consolidation by regulatory frameworks (c) to (f) corresponds to the risk frameworks listed in Part Three of the CRR and to the breakdown prescribed in the rest of these guidelines:

- Subject to credit risk – The carrying values of items (other than off-balance-sheet items) to which Part Three, Title II of the CRR applies and for which the disclosure requirements in Part Eight of the same regulation are specified in point 4.9 and point 4.10 of these guidelines should be included in column (c);
- Subject to CCR – The carrying values of items (other than off-balance-sheet items) to which Part Three, Title II, Chapter 6 of the CRR applies and for which the disclosure requirements in Part Eight of the same regulation are specified in point 4.11 of these guidelines should be included in column (d);
- Subject to the securitisation framework – The carrying values of items (other than off-balance-sheet items) from the non-trading book to which Part Three, Title II, Chapter 5 of the CRR applies should be included in column (e);
- Subject to the market risk framework – The carrying values of items (other than off-balance-sheet items) to which Part Three, Title IV of the CRR applies and for which the disclosure requirements in Part Eight of the same regulation are specified in point 4.13 of these guidelines for non-securitisation positions should be included in column (f). Items corresponding to securitisation positions in the trading book—to which the requirements in Part Three, Title IV of the CRR apply—should be included in column (f).
- Column (g) should include the amounts not subject to capital requirements according to the CRR or that are subject to deductions from own funds in accordance with Part Two of that regulation.

Deducted items should include, for instance, the items listed in Article 37, Article 38, Article 39, and Article 41 of that regulation. The amounts disclosed for assets should be the amounts actually deducted from own funds, taking into account any netting with liabilities allowed by (and any threshold for) deduction applicable as per the relevant articles in Part Two of the same regulation. When the items listed in Article 36(1)(k) and Article 48 of the CRR are 1 250% risk-weighted instead of being deducted, they should not be disclosed in column (g) but in the other appropriate columns of template EU LI1, as well as in the other appropriate templates provided for by these guidelines. This also applies to any other item that is 1 250% risk-weighted in accordance with the requirements in the CRR.

The amounts disclosed for liabilities should be the amount of liabilities that is taken into consideration for the determination of the amount of assets to be deducted from own funds as per the relevant articles in Part Two of the same regulation. In addition, it should be disclosed in column (g) all liabilities other than those (i) that are relevant for the application of requirements in Part Three, Title II, Chapter 4 of the CRR, or (ii) that are relevant for the application of requirements in Part Three, Title II, Chapter 6 and Title IV of the same regulation.

Where a single item attracts capital requirements according to more than one risk framework, it should be reported in all columns corresponding to the capital requirements it attracts. As a consequence, the sum of amounts in columns (c) to (g) may be greater than the amount in column (b).

Template 2: EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements

Purpose: Provide information on the main sources of differences (other than those due to different scopes of consolidation, which are shown in Template EU LI1) between the financial statements' carrying value amounts and the exposure amounts used for regulatory purposes.

Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.

Content: Carrying values. In this template, carrying values correspond to values reported in financial statements according to the scope of regulatory consolidation (rows 1 to 3) established following the regulatory consolidation requirements in Part One, Title II, Section 2 and Section 3 of the CRR and amounts considered for regulatory exposure purposes (row 10).

Frequency: Annual
Format: Flexible. Rows 1 to 4 are fixed and should be disclosed by all institutions. The other headings shown below are provided for illustrative purposes only and should be adapted by each institution to describe the most meaningful drivers for differences between its financial statements' carrying values under the regulatory scope of application and the exposure amounts considered for regulatory purposes.
Accompanying narrative: See Template EU LIA

	a	b	c	d	e
	Total	Items subject to			
		Credit risk framework	CCR framework	Securitisation framework	Market risk framework
1	Assets carrying value amount under the scope of regulatory consolidation (as per template EU LI1)				
2	Liabilities carrying value amount under the regulatory scope of consolidation (as per template EU LI1)				
3	Total net amount under the regulatory scope of consolidation				
4	Off-balance-sheet amounts				
5	<i>Differences in valuations</i>				
6	<i>Differences due to different netting rules, other than those already included in row 2</i>				
7	<i>Differences due to consideration of provisions</i>				
8	<i>Differences due to prudential filters</i>				
9	⋮				
10	Exposure amounts considered for regulatory purposes				

Definitions

Amounts in rows 1 and 2, columns (b) to (e) correspond to the amounts in columns (c) to (f) of EU LI1.

Total net amount under regulatory scope of consolidation: The amount after on-balance-sheet netting between assets and liabilities under the regulatory scope of consolidation, regardless of the eligibility of those assets and liabilities of the specific netting rules in the application of Part Three, Title II, Chapters 4 and 5, as well as of Title IV in the CRR.

Off-balance-sheet amounts: Include off-balance-sheet original exposures, prior to the use of a conversion factor, from the established off-balance-sheet statement, following the regulatory scope of consolidation in column (a) and the off-balance-sheet amounts subject to the regulatory framework, after the application of the relevant conversion factors in columns (b) to (e). The

conversion factor for off-balance-sheet items to be risk-weighted in the application of Part Three, Title II of the CRR is defined in Article 111, Article 166, Article 167 and Article 182 (as applicable for credit risk), Article 246 (as applicable for securitisation risk), Article 274 to Article 276 and Article 283 of the same regulation (as applicable for CCR).

Differences in valuations: Include the impact of the carrying amount of value adjustments in accordance with Part Two, Title I, Chapter 2, Article 34 and Part Three, Title I, Chapter 3, Article 105 of the CRR on trading book and non-trading book exposures measured at fair value in accordance with the applicable accounting framework.

Differences due to different netting rules, other than those already included in row 2: Refer to the net on-balance-sheet and off-balance-sheet exposure amounts after the application of the specific netting rules in Part Three, Title II, Chapters 4 and 5 as well as of Title IV in the CRR. The impact of the application of the netting rules can be negative (in case more exposures have to be netted than the use of on-balance-sheet netting in row 2) or positive (in the case of the application of netting rules in the CRR leading to a lower amount being netted out than on-balance-sheet netting in row 2).

Differences due to consideration of provisions: Discloses the re-integration in the exposure value of specific and general credit risk adjustments (as defined in the Commission Delegated Regulation (EU) No 183/2014) that have been deducted in accordance with the applicable accounting framework from the carrying amount of exposures under Part Three, Part II, Chapter 3 of the CRR for risk-weighting purposes. Regarding exposures risk-weighted in accordance with Part Three, Part II, Chapter 2 of the CRR, when the carrying amount in the financial statements under the regulatory scope of consolidation has been reduced by elements qualifying as general credit risk adjustments under the aforementioned delegated regulation, these elements have to be re-integrated in the exposure value.

Differences due to prudential filters: Include the impact on the carrying amount under the regulatory scope of consolidation of the prudential filters listed in Articles 32, 33 and 35 in Part Two, Title I, Chapter 2 of the CRR and applied in accordance with the requirements in Part Ten, Title I, Chapter 1, Article 467 and 468 in the CRR and CEBS 04/91 Guidelines on prudential filters for regulatory capital.

Exposure amounts considered for regulatory purposes: The expression designates the aggregate amount considered as a starting point of the RWA calculation before the application of CRM methods other than netting in Part Three, Title II, Chapter 4 of the CRR but after the application of netting requirements in Part Three, Title II, Chapters 4 and 5 and Title IV of the same regulation for each of the risk categories. Under the credit risk framework, this should correspond either to the exposure amount applied in the credit risk standardised approach (see Article 111 in Part Three, Title II, Chapter 2 of the CRR) or to the exposures at default (EAD) in the credit risk – IRB approach.

(See Article 166, Article 167 and Article 168 in Part Three, Title II, Chapter 3 of the CRR.) Securitisation exposures should be defined as in Article 246 in Part Three, Title II, Chapter 5 of the CRR. Counterparty credit exposures are the exposures defined as exposures considered for CCR purposes (see Part Three, Title II, Chapter 6 of the CRR). Market risk exposures correspond to positions subject to the market risk framework (see Part Three, Title IV of the CRR).

The breakdown of columns in the regulatory risk categories (b) to (e) corresponds to the breakdown listed in Part Three of the CRR and prescribed in these guidelines:

- The credit risk framework corresponds to the exposures in Part Three, Title II of the CRR, for which the disclosure requirements in Part Eight of the same regulation are specified in section 4.9 and section 4.10 of these guidelines;
- The CCR framework corresponds to the exposures in Part Three, Title II, Chapter 6 of the CRR, for which the disclosure requirements in Part Eight of the same regulation are specified in section 4.11 of these guidelines;
- The securitisation framework corresponds to exposures from the non-trading book given in Part Three, Title II, and Chapter 5 of the CRR;
- The market risk framework corresponds to exposures in Part Three, Title IV of the CRR, for which the disclosure requirements in Part Eight of the same regulation are specified in section 4.13 of these guidelines.

Template 3: EU LI3 – Outline of the differences in the scopes of consolidation (entity by entity)

Purpose: Provide information on the consolidation method applied for each entity within the accounting and the regulatory scopes of consolidation.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Disclosures shall be provided for all entities, included within the accounting and the regulatory scopes of consolidation as defined in accordance with the applicable accounting framework and Part One, Title II, Section 2 and Section 3 in the CRR, for which the method of the accounting consolidation is different from the method of the regulatory consolidation. Institutions should tick the applicable columns in order to identify the method of consolidation of each entity under the accounting framework and whether, under the regulatory scope of consolidation, each entity is (i) fully consolidated; (ii) proportionally consolidated; (iii) deducted from own funds; (iv) neither consolidated nor deducted; or (v) recognised under the equity method.
Frequency: Annual
Format: Flexible. The rows are flexible. The columns (a) to (g) are a minimum level of granularity for disclosure. Additional columns can be included depending on the consolidation methods implemented in accordance with Part One, Title II, Section 2 and Section 3 in the CRR as specified by any delegated or implementing regulation.
Accompanying narrative: See Table EU LIA. Clarify if the entities that are neither consolidated nor deducted are risk-weighted or not consolidated in accordance with Article 19 of the CRR.

Definitions

Name of the entity: The commercial name of any entity included or deducted from the regulatory and accounting scope of consolidation of an institution.

Method of accounting consolidation: The consolidation method used in accordance with the applicable accounting framework.

Method of regulatory consolidation: The consolidation method implemented for the purpose of Part One, Title II, Chapter 2 of the CRR. At a minimum, the methods listed in Article 436(b) of the same regulation should be disclosed.

Description of the entity: Brief description of the entity, with (at a minimum) disclosure of its sector of activity.

Name of the entity	Method of accounting consolidation	a	b	c	d	e	f
		Method of regulatory consolidation	Full consolidation	Proportional consolidation	Neither consolidated nor deducted	Deducted	Description of the entity
Entity A	Full consolidation		X				Credit institution
Entity N	Full consolidation			X			Credit institution
Entity Z	Full consolidation					X	Insurance entity
Entity AA	Full consolidation				X		Immaterial leasing company

65. In the application of Article 436(b), information in Template EU LI1 and Template EU LI2 should be accompanied by the explanatory information specified in Table EU LIA.

66. Information in point (c) in Table EU LIA should be provided both in relation to fair value measured exposures in the trading book (to which Article 105 and Article 455(c) in the CRR apply) and to exposures from the non-trading book (to which Article 35 in the same regulation applies).

Table 5: EU LIA – Explanations of differences between accounting and regulatory exposure amounts

Purpose: Provide qualitative explanations on the differences observed between accounting carrying value (as defined in EU LI1) and amounts considered for regulatory purposes (as defined in EU LI2) under each framework.
Scope of application: The table applies to all institutions included in paragraph 7 of these guidelines.
Content: Qualitative information
Frequency: Annual
Format: Flexible

Article 436(b)		Institutions should explain the origins of the differences between accounting amounts (as disclosed in financial statements under the accounting scope of consolidation) and regulatory exposure amounts (as displayed in templates EU LI1 and EU LI2).
Article 436(b)	(a)	Institutions should explain and quantify the origins of any significant differences between the amounts in columns (a) and (b) in EU LI1, regardless of whether the differences proceed from different consolidation rules or from the use of different accounting standards between the accounting and the regulatory consolidations.
Article 436(b)	(b)	Institutions should explain the origins of differences between carrying values under the regulatory scope of consolidation and amounts considered for regulatory purposes shown in EU LI2.
Article 455(c) Article 34 Article 105 Article 435(a) Article 436(b)	(c)	For exposures from the trading and the non-trading book that are measured at fair value in accordance with the applicable accounting framework and that have their exposure value adjusted in accordance with Part Two, Title I, Chapter 2, Article 34 and Part Three, Title I, Chapter 3, Article 105 of the CRR (as well as the Commission Delegated Regulation (EU) No 2016/101), institutions should describe systems and controls to ensure that the valuation estimates are prudent and reliable. These disclosures can be provided as part of the market risk disclosures for exposures from the trading book and should include: <ul style="list-style-type: none"> Valuation methodologies, including an explanation of how far mark-to-market and mark-to-model methodologies are used; Description of the independent price verification process; Procedures for valuation adjustments or reserves (including a description of the process and the methodology for valuing trading positions by type of instrument).

4.5 Own funds

67. The disclosures required by Article 437(1) of the CRR are specified in the Commission Implementing Regulation (EU) No 1423/2013 of 20 December 2013.

4.6 Capital requirements

68. These sections specify the requirements included in Article 438 of Part Eight in the CRR.

69. In accordance with Article 438(c) to (f) in the CRR, institutions should disclose Template OV1 on a quarterly basis

Template 4: EU OV1 – Overview of RWAs

Purpose: Provide an overview of total RWA forming the denominator of the risk-based capital requirements calculated in accordance with Article 92 of the CRR. Further breakdowns of RWAs are presented in subsequent parts of these guidelines.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: RWAs and minimum capital requirements under Part Three, Title I, Chapter 1 of the CRR.
Frequency: Quarterly
Format: Fixed
Accompanying narrative: Institutions are expected to identify and explain the drivers behind differences in reporting periods T and T-1 where these differences are significant. When minimum capital requirements in the application of Article 92 in the CRR do not correspond to 8% of RWAs in column (a), institutions should explain the adjustments made.

			RWAs		Minimum capital requirements
			T	T-1	T
	1	Credit risk (excluding CCR)			
Article 438(c)(d)	2	Of which the standardised approach			
Article 438(c)(d)	3	Of which the foundation IRB (FIRB) approach			
Article 438(c)(d)	4	Of which the advanced IRB (AIRB) approach			
Article 438(d)	5	Of which equity IRB under the simple risk-weighted approach or the IMA			
Article 107 Article 438(c)(d)	6	CCR			
Article 438(c)(d)	7	Of which mark to market			
Article 438(c)(d)	8	Of which original exposure			
	9	Of which the standardised approach			
	10	Of which internal model method (IMM)			
Article 438(c)(d)	11	Of which risk exposure amount for contributions to the default fund of a CCP			
Article 438(c)(d)	12	Of which CVA			
Article 438(e)	13	Settlement risk			
Article 449(o)(i)	14	Securitisation exposures in the banking book (after the cap)			
	15	Of which IRB approach			
	16	Of which IRB supervisory formula approach (SFA)			
	17	Of which internal assessment approach (IAA)			
	18	Of which standardised approach			
Article 438 (e)	19	Market risk			
	20	Of which the standardised approach			
	21	Of which IMA			
Article 438(e)	22	Large exposures			

Article 438(f)	23	Operational risk			
	24	Of which basic indicator approach			
	25	Of which standardised approach			
	26	Of which advanced measurement approach			
Article 437(2), Article 48 and Article 60	27	Amounts below the thresholds for deduction (subject to 250% risk weight)			
Article 500	28	Floor adjustment			
	29	Total			

Definitions

RWAs: RWAs as defined by the CRR. In accordance with Article 92(4) of the same regulation, the RWAs related to market risk, foreign exchange risk, settlement risk, commodities risk and operational risk are the capital requirements determined in accordance with the relevant requirements in the regulation, multiplied by 12.5.

RWAs (T-1): RWAs as disclosed in the previous interim period. As template EU OV1 is required to be disclosed with quarterly frequency, the RWA (T-1) figure should be the figure disclosed at the end of the previous quarter.

T capital requirements at the disclosure date calculated as per the specifications in Article 92 in the CRR. In accordance with Article 438 of the same regulation, the disclosed capital requirements will normally be $RWA \times 8\%$ but may differ if a floor is applicable or adjustments (such as scaling factors) are applied at jurisdiction level.

Credit risk (excluding CCR): RWAs and capital requirements calculated in accordance with Article 92, as well as in accordance with Part Three, Title II, Chapters 2 and 3 and Article 379 of the CRR. RWAs and capital requirements for credit risk are further disclosed in sections 4.9 and 4.10 of these guidelines. They exclude the RWAs and capital requirements of any item for which the exposure value is calculated in accordance with Part Three, Title II, Chapters 5 and 6 of the CRR. For those items, the associated RWAs and capital requirements are respectively disclosed in row 11 (for securitisation exposures in the non-trading book) and in row 5 (for CCR).

Of which the standardised approach: RWAs and capital requirements calculated according to Part Three, Title II, Chapter 2 of the CRR.

Of which the foundation IRB approach and Of which the advanced IRB approach : RWAs and capital requirements according to Part Three, Title II, Chapter 3 of the CRR. Capital requirements and RWAs arising from the FIRB and AIRB should be disclosed in separate rows.

Of which equity positions under the simple risk-weighted approach and the IMA: The amounts in row 4 correspond to RWAs for equity exposures for which institutions apply the approaches referred to in Article 155(2) and (4) in the CRR. For equity exposures treated under the PD/Loss given default (LGD) approach in accordance with Article 155(3) in the same regulation, the corresponding RWAs and capital requirements are reported in Template EU CR6 (portfolio equity PD/LGD) and are included in rows 3 or 4 of this template.

CCR: RWAs and capital requirements for elements whose exposure value is calculated in accordance with Part Three, Title II, Chapter 6 of the CRR. In accordance with Article 107, RWAs and capital requirements for those exposures are estimated on the basis of the requirements in Part Three, Title II, Chapters 2 and 3. The breakdown of capital requirements and RWAs according to the regulatory approach used for their estimation is disclosed in accordance with the specifications of section 4.11 of these guidelines. CCR RWAs and capital requirements do include those amounts linked to the charge for CVA risk of over the counter (OTC) derivatives other than credit derivatives recognised to reduce RWAs for credit risk, in accordance with Part Three, Title VI and Article 92(3)(d) of the CRR, as well as RWAs and capital requirements for the contributions to the default fund of a CCP calculated in accordance with Articles 307 to 309 of the same regulation.

Settlement risk: The capital requirements and RWA amounts calculated in accordance with Articles 92(3)(c)(ii) and 92(4)(b) in the CRR respectively. There is no corresponding template in these guidelines.

Securitisation exposures in banking book: The amounts correspond to capital requirements and RWAs for securitisation exposures in the non-trading book for which the RWAs and capital requirements are calculated in accordance with Part Three, Title II, Chapter 5. The RWA amounts must be derived from the capital requirements and therefore include the impact of the cap in accordance with Article 260 of that chapter, when applicable.

Market risk: The amounts reported in row 16 correspond to the capital requirements and RWAs estimated in accordance with Part Three, Title IV and Article 92(4) of the CRR. These amounts therefore include capital charges for securitisation positions booked in the trading book but exclude the CCR capital charges (reported in section 4.11 of this document and row 6¹⁹ of this template). Market risk capital requirements and RWAs are broken down in section 4.13 of these guidelines, while RWAs and capital requirements for CCR are broken down in section 4.11 of these guidelines.

¹⁹ Corrigendum: reference to row 6 has replaced the reference to row 4 that was included in the original version.

Large exposures: The capital requirements and RWA amounts calculated in accordance with Articles 92(3)(b)(ii) and 92(4)(b) in the CRR respectively. There is no corresponding template in these guidelines.

Operational risk: RWAs and capital requirements estimated in accordance of Article 92(4) and Part Three, Title III of the CRR. There is no corresponding template in these guidelines.

Amounts below the thresholds for deduction (subject to 250% risk weight): The amounts correspond to items not deducted from own funds, as they are below the applicable thresholds for deduction in accordance with Article 48 and Article 470 of the CRR. It particularly includes deferred tax assets as well as direct, indirect and synthetic holdings of CET 1 instruments from financial sector entities (as defined in Article 4(27) of the CRR) outside the scope of regulatory consolidation where the institution has a significant investment in those entities. The amounts disclosed in this row are after the application of the 250% risk weight.

Floor adjustment: This row must be used to disclose the impact of any floor implemented in accordance with Article 500(1) or (where relevant and after meeting the prerequisites) Article 500(2) in the CRR so that the total row in template EU OV1 reflects the total RWAs and total capital requirements in accordance with Article 92 in the CRR, including such an adjustment. Floor or adjustments applied at a more granular level (where relevant at risk category level) must be reflected in the capital requirements reported for this risk category. Additional capital requirements based on the supervisory review process—as referred to in point (a) of Article 104(1) of Directive 2013/36/EU—should not be included in the row floor adjustment. However, when the disclosure of these capital requirements is demanded by the relevant competent authority in accordance with Article 438(b) of the CRR or voluntarily disclosed in the application of the EBA Opinion 2015/24, they should be included in a distinct row, separated from the capital requirements and calculated in accordance with Article 92 of the CRR.

70. To comply with the last paragraph of Article 438, institutions calculating risk-weighted exposure amounts in accordance with Article 153(5) or Article 155(2) for specialised lending and equity exposures respectively should disclose Template EU CR10.

Template 5: EU CR10 – IRB (specialised lending and equities)

Purpose: Provide quantitative disclosures of institutions’ specialised lending and equity exposures using the simple risk-weighted approach.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines using one of the approaches included in the template in accordance with Article 153(5) or Article 155(2) of the CRR.
Content: Carrying values, exposure amounts, RWAs and capital requirements.
Frequency: Semi-annual
Format: Flexible
Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary.

Specialised lending							
Regulatory categories	Remaining maturity	On-balance-sheet amount	Off-balance-sheet amount	Risk weight	Exposure amount	RWAs	Expected losses
Category 1	Less than 2.5 years			50%			
	Equal to or more than 2.5 years			70%			
Category 2	Less than 2.5 years			70%			
	Equal to or more than 2.5 years			90%			
Category 3	Less than 2.5 years			115%			
	Equal to or more than 2.5 years			115%			
Category 4	Less than 2.5 years			250%			
	Equal to or more than 2.5 years			250%			
Category 5	Less than 2.5 years			-			
	Equal to or more than 2.5 years			-			
Total	Less than 2.5 years						
	Equal to or more than 2.5 years						

Equities under the simple risk-weighted approach						
Categories	On-balance-sheet amount	Off-balance-sheet amount	Risk weight	Exposure amount	RWAs	Capital requirements
Private equity exposures			190%			
Exchange-traded equity exposures			290%			
Other equity exposures			370%			
Total						

Definitions

On-balance-sheet amount: Banks should disclose the amount of exposures in accordance with Article 167 of the CRR (net of allowances and write-offs) under the regulatory scope of consolidation as per Part One, Title II, Chapter 2 of the same regulation.

Off-balance-sheet amount: Banks should disclose the exposure value in accordance with Article 167 of the CRR without taking into account conversion factors and the effect of CRM techniques.

Exposure amount: The amount relevant for the capital requirement's calculation; therefore, it is the amount derived after having applied CRM techniques and the credit conversion factor (CCF).

EL: Amount of EL calculated according to Article 158 of the CRR.

Category: Category specified in Article 153(5) of the CRR.

71. Parent institutions, parent financial holding companies or parent mixed financial holding companies or institutions should disclose the information required by Article 438(c) and (d) on exposures that are risk-weighted in accordance with Part Three, Title II, Chapter 2 or Chapter 3 by specifying information regarding non-deducted participations risk-weighted under the above-mentioned requirements in the CRR, when they are allowed (in accordance with Article 49(1) of the CRR) to not deduct their holdings of own funds instruments of an insurance undertaking, a re-insurance undertaking or an insurance holding company. Information should be separately disclosed as per specified in Template EU INS1.

Template 6: EU INS1 – Non-deducted participations in insurance undertakings

Purpose: Provide users with information regarding the impact on RWAs in terms of the authorisation granted to institutions to not deduct their holdings of own funds instruments of an insurance undertaking, a re-insurance undertaking or an insurance holding company in which institutions have a significant investment.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines that are required or permitted by their competent authorities to apply method 1, 2 or 3 of Annex I in Directive 2002/87/EC and permitted (in accordance with Article 49(1) of the CRR) to not deduct their holdings of own funds instruments of an insurance undertaking, a re-insurance undertaking or an insurance holding company for the purpose of calculating their capital requirements on an individual, subconsolidated and consolidated basis.
Content: Carrying amount and risk-weighted exposures.
Frequency: Semi-annual
Format: Fixed
Accompanying narrative: Institutions should disclose any relevant information regarding the incidence of the use of treatment allowed by Article 49(1) of the CRR on their RWAs and the changes of this incidence over time.

	Value
Holdings of own funds instruments of a financial sector entity where the institution has a significant investment not deducted	

from own funds (before risk-weighting)	
Total RWAs	

Definitions

Rows

Holdings of own funds instruments of a financial sector entity where the institution has a significant investment not deducted from own funds (before risk-weighting): Carrying amount of own funds instruments from an insurance undertaking, a re-insurance undertaking or an insurance holding company in which institutions have a significant investment and for which institutions have been allowed to apply the non-deduction treatment in Article 49(1) of the CRR (participations in insurance undertakings). The carrying amount should be the accounting value in accordance with Article 24 of that regulation, as in the financial statements under the regulatory scope of consolidation in accordance with Part One, Title II, Chapter 2 of that regulation.

Total risk-weighted exposure amount (RWAs): Risk-weighted amounts of non-deducted participations in the application of Article 49(4) of the CRR.

Columns

Value: Carrying amount of insurance participation and RWAs

4.7 Macroprudential supervisory measures

72.The disclosures required by Article 440 of the CRR are specified in the Commission Delegated Regulation (EU) No 2015/1555 of 28 May 2015.

73.The disclosures required by Article 441 are specified in the Commission Implementing Regulation (EU) No 1030/2014 of 29 September 2014 and in the revised EBA Guidelines on further specification of the indicators of global systemic importance and their disclosure (EBA Guidelines 2016/01).

4.8 Credit risk and general information on CRM

74.The following content in these guidelines specify the disclosure requirements to be provided in accordance with Article 442 and Article 453 in the CRR. Information on credit risk included in the sections below relates only to instruments subject to Part Three, Title II, Chapter 2 and Chapter 3 in order to calculate their risk-weighted exposure amount for the purposes of Article 92(3)(a) in the same regulation (credit risk under the standardised and the IRB approaches).

75.Instruments subject to Part Three, Title II, Chapter 6 of the CRR (exposures subject to CCR), as well as instruments to which the requirements in Part Three, Title II, Chapter 5 of the same regulation apply (exposures under the securitisation framework) are not covered by the disclosures in the following sections. Disclosures in relation to instruments subject to Part Three, Title II, Chapter 6 are specified in section 4.11 of these guidelines.

Section A – General qualitative information on credit risk

76.In the application of Article 442(a) and (b), institutions should disclose information listed in Table EU CRB-A below.

Table 6: EU CRB-A – Additional disclosure related to the credit quality of assets

Purpose: Supplement the quantitative templates with information on the credit quality of an institution’s assets.
Scope of application: The table applies to all institutions included in paragraph 7 of these guidelines.
Content: Additional qualitative and quantitative information (carrying values).
Frequency: Annual
Format: Flexible

Institutions should provide the following disclosures when informing on (within the scope of definition) past-due and impaired exposures used for accounting purposes in accordance with Article 442(a):

Qualitative disclosures	
Article 442(a)	The scope and definitions of ‘past-due’ and ‘impaired’ exposures used for accounting purposes and the differences, if any, between the definitions of past due and default for accounting and regulatory purposes as specified by the EBA Guidelines on the application of the definition of default.
Article 442(a)	The extent of past-due exposures (more than 90 days) that are not considered to be impaired and the reasons for this.
Article 442(b)	Description of methods used for determining general and specific credit risk adjustments.
Article 442(a)	The institution’s own definition of a restructured exposure used for the implementation of Article 178(3)(d) specified by the EBA Guidelines on default when different from the definition of forborne exposure defined in Annex V of the Commission Implementing Regulation (EU) No 680/2014.

Section B – General quantitative information on credit risk

77. In the application of Article 442(c), institutions should provide information in Template EU CRB-B below.

Template 7: EU CRB-B – Total and average net amount of exposures

Purpose: Provide the total and the average amount of net exposures over the period by exposure class.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Net values of on-balance-sheet and off-balance-sheet exposures (corresponding to the accounting values reported in financial statements but according to the scope of regulatory consolidation as per Part One, Title II, Chapter 2 of the CRR).
Frequency: Annual
Format: Flexible in the rows. The columns cannot be altered. The rows should reflect (at a minimum) the material exposure classes, taking the definition of exposure classes as given in Articles 112 and 147 of the CRR.
Accompanying narrative: Institutions are expected to explain the drivers of any significant changes in the amounts from the previous reporting period.

		a	b
		Net value of exposures at the end of the period	Average net exposures over the period
1	Central governments or central banks		

2	Institutions		
3	Corporates		
4	<i>Of which: Specialised lending</i>		
5	<i>Of which: SMEs</i>		
6	Retail		
7	<i>Secured by real estate property</i>		
8	<i>SMEs</i>		
9	<i>Non-SMEs</i>		
10	<i>Qualifying revolving</i>		
11	<i>Other retail</i>		
12	<i>SMEs</i>		
13	<i>Non-SMEs</i>		
14	Equity		
15	Total IRB approach		
16	Central governments or central banks		
17	Regional governments or local authorities		
18	Public sector entities		
19	Multilateral development banks		
20	International organisations		
21	Institutions		
22	Corporates		
23	<i>Of which: SMEs</i>		
24	Retail		
25	<i>Of which: SMEs</i>		
26	Secured by mortgages on immovable property		
27	<i>Of which: SMEs</i>		
28	Exposures in default		
29	Items associated with particularly high risk		
30	Covered bonds		
31	Claims on institutions and corporates with a short-term credit assessment		
32	Collective investments undertakings		
33	Equity exposures		
34	Other exposures		
35	Total standardised approach		
36	Total		

Definitions

Columns

Exposure: In accordance with Article 5 of the CRR, exposure refers to an asset or an off-balance-sheet item that gives rise to a credit risk exposure according to the CRR framework.

Net value of the exposure: For on-balance-sheet items, the net value is the gross carrying value of exposure less allowances/impairments. For off-balance-sheet items, the net value is the gross carrying value of exposure less provisions.

Average net exposure over the period: The average of the net exposure values observed at the end of each quarter of the observation period.

Gross carrying values: The accounting value before any allowance/impairments but after considering write-offs. Institutions should not take into account any CRM technique in the application of Part Three, Title II, Chapter 4 of the CRR. Off-balance-sheet items should be disclosed for their nominal amount gross of any CCF applicable in accordance with Article 111 and 166 of the CRR or CRM techniques, and gross of any provision, particularly (a) guarantees given (the maximum amount that the institution would have to pay if the guarantee were called) and (b) loan commitments and other commitments (the total amount that the institution has committed to lend).

Allowances/impairments and provisions: For on-balance-sheet assets, total amount of impairments made via an allowance or via a direct reduction in the carrying amount against impaired and not impaired exposures according to the applicable accounting framework. Direct reductions for the purpose of impairment are different from write-offs, in the sense that they are not derecognition events due to uncollectability, but write-downs due to credit risk (the written-down amount can be reversed via an increase in the carrying value of the exposure). For off-balance-sheet items, provisions are made in accordance with the accounting framework.

Write-offs: Write-offs constitute a derecognition event and relate to a financial asset in its entirety or to a portion of it. Write-offs include (respectively) the partial and total amount of principal and past-due interest of any on-balance-sheet instrument that is derecognised because the institution has no reasonable expectations of recovering the contractual cash flows. Write-offs shall include amounts caused both by reductions of the carrying amount of financial assets recognised directly in profit or loss, as well as reductions in the amounts of the allowance accounts for credit losses taken against the carrying amount of financial assets.

Rows

Exposure class: Institutions should report the exposure within an exposure class only when the exposure is material according to the EBA Guidelines 2014/14. Institutions may aggregate the immaterial exposures in one row: 'other'.

78. In the application of Article 442(d), institutions should provide information on the geographical breakdown of the net value of exposures using Template EU CRB-C below. Template EU CRB-C can be further detailed if appropriate.

Template 8: EU CRB-C – Geographical breakdown of exposures

Purpose: Provide a breakdown of exposures by geographical areas and exposure classes.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Net values of on-balance-sheet and off-balance-sheet exposures (corresponding to the accounting values reported in financial statements but according to the scope of regulatory consolidation as per Part One, Title II, Chapter 2 of the CRR).
Frequency: Annual
Format: Flexible. The columns should provide the significant geographical areas in which institutions have material exposure classes. The rows should (at a minimum) reflect the material exposure classes, taking the definition of exposure classes under Articles 112 and 147 of the CRR. They can be supplemented to provide further details as appropriate.
Accompanying narrative: Institutions are expected to explain the drivers of any significant changes in the amounts from the previous reporting period. When materiality of geographical areas or countries is determined using a materiality threshold, that threshold should be disclosed, as well as the list of immaterial countries included in the columns 'other geographical areas' and 'other countries'.

		a	b	c	d	e	f	h	i	j	k	l	m	n
		Net value												
		Significant area 1	Country 1	Country 2	Country 3	Country 4	Country 5	Country 6	Country N	Other countries	Significant area N	Country N	Other geographical areas	Total
1	Central governments or central banks													
2	Institutions													
3	Corporates													
4	Retail													
5	Equity													
6	Total IRB approach													
7	Central governments or central banks													
8	Regional governments or local authorities													
9	Public sector entities													
10	Multilateral development banks													
11	International organisations													
12	Institutions													

13	Corporates													
14	Retail													
15	Secured by mortgages on immovable property													
16	Exposures in default													
17	Items associated with particularly high risk													
18	Covered bonds													
19	Claims on institutions and corporates with a short-term credit assessment													
20	Collective investments undertakings													
21	Equity exposures													
22	Other exposures													
23	Total standardised approach													
24	Total													

Definitions**Columns**

Significant geographical areas: mean (for the purpose of Template EU CRB-C) a group of significant countries in which the disclosing institution has exposures. Institutions should determine significant geographical areas as those geographical areas that are deemed material in the application of the EBA Guidelines 2014/14 and should break down the exposures within each significant geographical area in significant countries of exposures.

Significant countries: Countries in which the institution's exposures are deemed material in the application of the EBA Guidelines 2014/14.

Exposures to geographical areas or countries that are not deemed material should be aggregated and reported in the residual column 'other geographical areas' or (within each area) 'other countries'. When materiality of geographical areas or countries is determined using a materiality threshold, that threshold should be disclosed, as well as the list of immaterial geographical areas and countries included in the 'other geographical areas' and 'other countries' columns.

Institutions should allocate exposures to a significant country on the basis of the residence of the immediate counterparty. Exposures with supranational organisations shall not be assigned to the country of residence of the institution but to the geographical area 'other geographical areas'.

Rows

Net values: See the definition in Template EU CRB-B.

Exposure class: Institutions should report the exposure within an exposure class only when the exposure is material according to the EBA Guidelines 2014/14. Institutions may aggregate the immaterial exposures in one row: 'other'.

79. In the application of Article 442(e), institutions should provide information on the industry or counterparty type of exposures in accordance with Template CRB-D below, and provide further details if appropriate.
80. Template EU CRB-D below shows a breakdown by industry sector. When an institution chooses to replace or to supplement the breakdown by industry sector by a breakdown between counterparty types (as allowed under Article 442(e)), the column breakdown should be adjusted and (at a minimum) it should differentiate between financial sector and non-financial sector counterparties as defined in Article 4(27) in the CRR. Further details should be provided if appropriate.
81. The breakdown by exposure classes, industry or counterparties should separately identify the exposure classes, industry or counterparties that are deemed material in accordance with the EBA Guidelines 2014/14. Exposure classes, industry or counterparties that are deemed immaterial can be aggregated in a row or column 'other'.

Template 9: EU CRB-D – Concentration of exposures by industry or counterparty types

Purpose: Provide a breakdown of exposures by industry or counterparty types and exposure classes.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Net values of on-balance-sheet and off-balance-sheet exposures (corresponding to the accounting values reported in financial statements but according to the scope of regulatory consolidation as per Part One, Title II, Chapter 2 of the CRR). The counterparty sector allocation is based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor should be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure.
Frequency: Annual
Format: Flexible. The columns should provide the material industry sectors or counterparty types to which institutions have exposures. Materiality should be assessed based on the EBA Guidelines 2014/14, and immaterial industry sectors or counterparty types can be aggregated under a column 'other'. The rows should (at a minimum) reflect the material exposure classes (taking the definition of exposure classes under Articles 112 and 147) and can be supplemented to provide further details as appropriate.
Accompanying narrative: Institutions are expected to explain the drivers of any significant changes in the amounts from the previous reporting period.

		a	b	c	d	e	f	g	h	i	j	l	m	n	o	p	q	r	s	u
		Agriculture, forestry and fishing	Mining and quarrying	Manufacturing	Electricity, gas, steam and air conditioning supply	Water supply	Construction	Wholesale and retail trade	Transport and storage	Accommodation and food service activities	Information and communication	Real estate activities	Professional, scientific and technical activities	Administrative and support service activities	Public administration and defence, compulsory social security	Education	Human health services and social work activities	Arts, entertainment and recreation	Other services	Total
1	Central governments or central banks																			
2	Institutions																			
3	Corporates																			
4	Retail																			
5	Equity																			
6	Total IRB approach																			
7	Central governments or central banks																			
8	Regional governments or local authorities																			
9	Public sector entities																			
10	Multilateral development banks																			
11	International organisations																			
12	Institutions																			
13	Corporates																			
14	Retail																			
15	Secured by mortgages on immovable property																			
16	Exposures in default																			
17	Items associated with particularly high risk																			
18	Covered bonds																			
19	Claims on institutions and corporates with a short-term credit assessment																			

20	Collective investments undertakings																		
21	Equity exposures																		
22	Other exposures																		
23	Total standardised approach																		
24	Total																		

82. In the application of Article 442(f), institutions should provide information on the residual maturity of their net exposures in accordance with Template EU CRB-E below, and provide further details if appropriate.

83. While Template EU CRB-E should include only those exposure classes that are deemed material in the application of EBA Guidelines 2014/14. Immaterial exposure classes may be aggregated in a row 'other'.

Template 10: EU CRB-E – Maturity of exposures

Purpose: Provide a breakdown of net exposures by residual maturity and exposure classes.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Net values of on-balance-sheet exposures (corresponding to the accounting values reported in financial statements but according to the scope of regulatory consolidation in Part One, Title II, Chapter 2 of the CRR).
Frequency: Annual
Format: Flexible. The rows should, at a minimum, reflect the material exposure classes (taking the definition of exposure classes under Articles 112 and 147 of the CRR).
Accompanying narrative: Institutions are expected to explain the drivers of any significant changes in the amounts from the previous reporting period.

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Central governments or central banks						
2	Institutions						
3	Corporates						
4	Retail						
5	Equity						
6	Total IRB approach						
7	Central governments or central banks						
8	Regional governments or local authorities						
9	Public sector entities						
10	Multilateral development banks						
11	International organisations						
12	Institutions						
13	Corporates						
14	Retail						
15	Secured by mortgages on immovable property						
16	Exposures in default						
17	Items associated with particularly high risk						
18	Covered bonds						
19	Claims on institutions and corporates with a short-term credit assessment						
20	Collective investments undertakings						

21	Equity exposures						
22	Other exposures						
23	Total standardised approach						
24	Total						

Definitions

Columns

Net exposure values: The net values as defined in Template EU CRB-B shall be reported by residual contractual maturities. In this disclosure:

- When a counterparty has a choice of when an amount is repaid, the amount is allocated to column 'on demand'. The column includes balances receivable on demand (call), at short notice, current accounts and similar balances (which may include loans that are overnight deposits for the borrower, regardless of their legal form). It also includes 'overdrafts' that are debit balances on current account balances;
- When an exposure has no stated maturity for reasons other than the counterparty having the choice of the repayment date, the amount of this exposure should be disclosed in column 'no stated maturity'.
- When the amount is repaid in instalments, the exposure should be allocated in the maturity bucket corresponding to the last instalment.

Rows

Exposure class: Institutions should separately disclose only those exposure classes that are deemed material in accordance with the EBA Guidelines 2014/14. Institutions may aggregate the immaterial exposures in one row: 'other'.

84. In the application of Article 442(g) and (h), institutions should disclose a breakdown of their defaulted and non-defaulted exposures by exposure classes as provided for in Template EU CR1-A below. Where more practicable, Template CR1-A can be split between two templates: one for exposures treated under the standardised approach and one for exposures under the IRB approach.

85. The total exposure amounts used in Template EU CR1-A should be broken down by significant industry or counterparty types in accordance with Template EU CR1-B, and by significant geographical area in accordance with Template EU CR1-C. Templates EU CR1-B and EU CR1-C can be provided separately for exposures under the standardised approach and the IRB approach.

86. Institutions can choose whether to disclose a breakdown of their exposures by significant industry or counterparty type. The granularity of the breakdown chosen in Template EU CR1-B, including when institutions choose to disclose a breakdown of both industry and counterparty types, should be consistent with the granularity of the breakdown used in Template EU CRB-D. Similarly, the geographical breakdown provided in Template EU CR1-C should be consistent with the geographical breakdown in Template EU CRB-C.

87. The breakdown of exposures and credit risk adjustments by exposure classes, industry or counterparty type should individually identify those exposure classes, industry sectors or counterparty types that are deemed material in the application of EBA Guidelines 2014/14. Exposure classes, industry sectors or counterparty types that are deemed immaterial can be aggregated and disclosed in a single row or column (as appropriate) named 'other'.

88. Past-due exposures (irrespective of their impairment or default status) should then be broken down by past-due bands, as illustrated in Template EU CR1-D. Past-due exposures should be broken down by types of instruments.

Template 11: EU CR1-A – Credit quality of exposures by exposure class and instrument

Purpose: Provide a comprehensive picture of the credit quality of an institution's on-balance-sheet and off-balance-sheet exposures.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Net values (corresponding to the accounting values reported in financial statements but according to the scope of regulatory consolidation as per Part One, Title II, Chapter 2 of the CRR).
Frequency: Semi-annual
Format: Fixed. The rows should, at a minimum, reflect the material exposure classes (taking the definition of exposure classes under Articles 112 and 147 of the CRR).
Accompanying narrative: Institutions are expected to explain the drivers of any significant changes in the amounts from the previous reporting period.

		a	b	c	d	e	f	G
		Gross carrying values of		Specific credit risk adjustment	General credit risk adjustment	Accumulated write-offs	Credit risk adjustment charges of the period	Net values
		Defaulted exposures	Non-defaulted exposures					(a+b-c-d) ²⁰
1	Central governments or central banks							
2	Institutions							
3	Corporates							
4	<i>Of which: Specialised lending</i>							
5	<i>Of which: SMEs</i>							
6	Retail							
7	<i>Secured by real estate property</i>							
8	<i>SMEs</i>							
9	<i>Non-SMEs</i>							

²⁰ Corrigendum: Formula "(a+b-c-d)" has replaced the formula "(a+b-c-d-e)" that was included in the original version.

10	Qualifying revolving							
11	Other retail							
12	SMEs							
13	Non-SMEs							
14	Equity							
15	Total IRB approach							
16	Central governments or central banks							
17	Regional governments or local authorities							
18	Public sector entities							
19	Multilateral development banks							
20	International organisations							
21	Institutions							
22	Corporates							
23	<i>Of which: SMEs</i>							
24	Retail							
25	<i>Of which: SMEs</i>							
26	Secured by mortgages on immovable property							
27	<i>Of which: SMEs</i>							

28	Exposures in default							
29	Items associated with particularly high risk							
30	Covered bonds							
31	Claims on institutions and corporates with a short-term credit assessment							
32	Collective investments undertakings							
33	Equity exposures							
34	Other exposures							
35	Total standardised approach							
36	Total							
37	Of which: Loans							
38	Of which: Debt securities							
39	Of which: Off-balance-sheet exposures							

Definitions**Columns**

Gross carrying values: See the definition in Template EU CRB-B.

Net exposure values: See the definition in Template EU CRB-B.

Defaulted exposures: For exposures under the IRB approach and the standardised approach, defaulted exposures are exposures defaulted in accordance with Article 178 of the CRR.

Non-defaulted exposures: Any exposure not defaulted in accordance with Article 178 in the CRR.

General and specific credit risk adjustments: Include accumulated amounts defined in the Article 1 of the Commission Delegated Regulation (EU) No 183/2014 of 20 December 2013.

Accumulated write-offs: See the definition of write-offs in Template EU CRB-B. These amounts shall be reported until the total extinguishment of all the institution's rights (by expiry of the statute of limitations period, forgiveness or other causes) or until recovery. Therefore, when the rights of an institution are not extinguished, written-off amounts shall be reported even though the loan has been entirely derecognised and no enforcement action has been taking place. Accumulated write-offs do not include direct value adjustments of the gross carrying value of an exposure when these direct value adjustments are due to impairment and not to the uncollectibility of part or all of the exposure. Those direct value adjustments should be disclosed as credit risk adjustments.

Credit risk adjustments charge: Charges booked in the period for specific and general credit risk adjustments.

Rows

Exposure class: Institutions should report the exposure within an exposure class only when the exposure is material according to the EBA Guidelines 2014/14. Institutions may aggregate the immaterial exposures in one row: 'other'.

89. Template EU CR1-B below shows a breakdown of the total exposures by industry sector. When an institution chooses to replace or to supplement the breakdown by industry sector by a breakdown between counterparty types (as allowed under Article 442(g)), the row breakdown should be adjusted and (at a minimum) it should differentiate between financial sector and non-financial sector counterparties as defined in Article 4(27) in the CRR.

Template 12: EU CR1-B – Credit quality of exposures by industry or counterparty types

Purpose: Provide a comprehensive picture of the credit quality of an institution's on-balance-sheet and off-balance0sheet exposures by industry or counterparty types.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Net values (corresponding to the accounting values reported in financial statements but according to the scope of regulatory consolidation as per Part One, Title II, Chapter 2 of the CRR) of total exposures under the standardised approach and the IRB approach altogether.
Frequency: Semi-annual
Format: Fixed. The row breakdown is flexible and should be consistent with the breakdown used in Template EU CRB-D, but the column breakdown is fixed.
Accompanying narrative: Institutions are expected to explain the drivers of any significant changes in the amounts from the previous reporting period.

		a	b	c	d	e	f	g
		Gross carrying values of		Specific credit risk adjustment	General credit risk adjustment	Accumulated write-offs	Credit risk adjustment charges	Net values
		Defaulted exposures	Non-defaulted exposures					(a + b - c - d) ²¹
1	Agriculture, forestry and fishing							
2	Mining and quarrying							
3	Manufacturing							
4	Electricity, gas, steam and air conditioning supply							
5	Water supply							
6	Construction							
7	Wholesale and retail trade							
8	Transport and storage							
9	Accommodation and food service activities							
10	Information and communication							
11	Real estate activities							
12	Professional, scientific and technical activities							

²¹ Corrigendum: Formula "(a+b-c-d)" has replaced the formula "(a+b-c-d-e)" that was included in the original version.

13	Administrative and support service activities							
14	Public administration and defence, compulsory social security							
15	Education							
16	Human health services and social work activities							
17	Arts, entertainment and recreation							
18	Other services							
19	Total							

Definitions

Columns

Gross carrying values: See the definition in Template EU CRB-B.

Net exposure values: See the definition in Template EU CRB-B.

Defaulted exposures: For exposures under the IRB approach and the standardised approach, defaulted exposures are exposures defaulted in accordance with Article 178 of the CRR.

Non-defaulted exposures: Any exposure not defaulted in accordance with Article 178 in the CRR.

General and specific credit risk adjustments: Include amounts defined in the Article 1 of the Commission Delegated Regulation (EU) No 183/2014 of 20 December 2013.

Accumulated write-offs: See the definition of write-offs in Template EU CRB-B. These amounts shall be reported until the total extinguishment of all the institution's rights (by expiry of the statute of limitations period, forgiveness or other causes) or until recovery. Therefore, when the rights of an institution are not extinguished, written-off amounts shall be reported even though the loan has been entirely derecognised and no enforcement action has been taking place. Accumulated write-offs do not include direct value adjustments of the gross carrying value of an exposure when these direct value adjustments are due to impairment and not to uncollectibility of part or all of the exposure. Those direct value adjustments should be disclosed as credit risk adjustments.

Credit risk adjustments charge: Charges booked in the period for specific and general credit risk adjustments.

Rows

Counterparty sector allocation is based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor should be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure.

The rows should provide the material industry sectors or counterparty types to which institutions have exposures. Materiality should be assessed based on the EBA Guidelines 2014/14, and immaterial industry sectors or counterparty types can be aggregated under a row 'other'.

Template 13: EU CR1-C – Credit quality of exposures by geography

Purpose: Provide a comprehensive picture of the credit quality of an institution's on-balance-sheet and off-balance-sheet exposures by geography.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Net values (corresponding to the accounting values reported in financial statements but according to the scope of regulatory consolidation as per Part One, Title II, Chapter 2 of the CRR) of total exposures under the standardised approach and the IRB approach altogether broken down by significant geographical areas and jurisdictions in which institutions have exposures.
Frequency: Semi-annual
Format: Fixed. The breakdown by geographical areas and jurisdictions is flexible and should be consistent with the breakdown used in Template EU CRB-C, but the column breakdown is fixed.
Accompanying narrative: Institutions are expected to explain the drivers of any significant changes in the amounts from the previous reporting period. When materiality of geographical areas or countries is determined using a materiality threshold, that threshold should be disclosed, as well as the list of immaterial countries included in the 'other geographical areas' and 'other countries' rows.

		a	b	c	d	e	f	g
		Gross carrying values of		Specific credit risk adjustment	General credit risk adjustment	Accumulated write-offs	Credit risk adjustment charges	Net values
		Defaulted exposures	Non-defaulted exposures					(a+ b -c-d) ²²
1	Geographical area 1							
2	Country 1							
3	Country 2							
4	Country 3							
5	Country 4							

²² Corrigendum: Formula "(a+b-c-d)" has replaced the formula "(a+b-c-d-e)" that was included in the original version.

6	Country N							
7	Other countries							
8	Geographical area 2							
9	Geographical area N							
10	Other geographical areas							
11	Total							

Definitions

Columns

Gross carrying values: See the definition in Template EU CRB-B.

Net exposure values: See the definition in Template EU CRB-B.

Defaulted exposures: For exposures under the IRB approach and the standardised approach, defaulted exposures are exposures defaulted in accordance with Article 178 of the CRR.

Non-defaulted exposures: Any exposure not defaulted in accordance with Article 178 in the CRR.

General and specific credit risk adjustments: Include amounts defined in Article 1 of the Commission Delegated Regulation (EU) No 183/2014 of 20 December 2013.

Accumulated write-offs: See the definition of write-offs in Template EU CRB-B. These amounts shall be reported until the total extinguishment of all the institution's rights (by expiry of the statute of limitations period, forgiveness or other causes) or until recovery. Therefore, when the rights of an institution are not extinguished, written-off amounts shall be reported even though the loan has been entirely derecognised and no enforcement action has been taking place. Accumulated write-offs do not include direct value adjustments of the gross carrying value of an exposure when these direct value adjustments are due to impairment and not to uncollectibility of part or all of the exposure. Those direct value adjustments should be disclosed as credit risk adjustments.

Credit risk adjustments charge: Charges booked in the period for specific and general credit risk adjustments.

Rows

Significant geographical areas mean (for the purpose of Template CRB-C) a group of significant countries in which the disclosing institution has exposures. Institutions should determine significant geographical areas as those geographical areas that are deemed material in the application of the EBA Guidelines 2014/14 and should break down the exposures within each significant geographical area in significant countries of exposures. Significant countries are countries in which the institution's exposures are deemed material in the application of the EBA Guidelines 2014/14.

Exposures to geographical areas or countries that are not deemed material should be aggregated and reported in the residual column 'other geographical areas' or (within each area) 'other countries'. When materiality of geographical areas or countries is determined using a materiality threshold, that threshold should be disclosed, as well as the list of immaterial geographical areas and countries included in the 'other geographical areas' and 'other countries' columns.

Institutions should allocate exposures to a significant country on the basis of the residence of the immediate counterparty. Exposures with supranational organisations shall not be assigned to the country of residence of the institution but to the geographical area 'other geographical areas'.

Template 14: EU CR1-D – Ageing of past-due exposures

Purpose: Provide an ageing analysis of accounting on-balance-sheet past-due exposures regardless of their impairment status.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Gross carrying values (corresponding to the accounting values before impairment and provisions but after the write-off reported in financial statements according to the scope of regulatory consolidation as per Part One, Title II, Chapter 2 of the CRR).
Frequency: Semi-annual
Format: Fixed. Minimum past-due bands can be supplemented by additional past-due bands to better reflect the ageing of past-due exposures in an institution's portfolio.
Accompanying narrative: Institutions are expected to explain the drivers of any significant changes in the amounts from the previous reporting period.

		a	b	c	d	e	f
		Gross carrying values					
		≤ 30 days	> 30 days ≤ 60 days	> 60 days ≤ 90 days	> 90 days ≤ 180 days	> 180 days ≤ 1 year	> 1 year
1	Loans						
2	Debt securities						
3	Total exposures						

Definitions

Columns

The gross carrying amounts of past-due exposures shall be broken down according to the number of days of the oldest past-due exposure.

90. Information provided in the application of Article 442(g) and (i) on impaired and past-due exposures should be supplemented by information on non-performing and forborne exposures in accordance with Template EU CR1-E below.

Template 15: EU CR1-E – Non-performing and forborne exposures

Purpose: Provide an overview of non-performing and forborne exposures as per the Commission Implementing Regulation (EU) No 680/2014.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Gross carrying values (corresponding to the accounting values before impairment, provisions and accumulated negative fair value adjustments due to credit risk reported in financial statements but according to the scope of regulatory consolidation as per Part One, Title II, Chapter 2 of the CRR). When the amount of accumulated impairment and provisions and negative fair value adjustments due to credit risk is materially different from the amount of specific and general credit risk adjustments disclosed in Templates EU CR1-A to D, institutions should separately disclose the amount of accumulated negative changes in fair value due to credit risk.
Frequency: Semi-annual
Format: Flexible
Accompanying narrative: Institutions are expected to explain the drivers of any significant changes in the amounts from the previous reporting period and explain the differences between the amounts of non-performing, impaired and defaulted exposures.

	a	b	c	d	e	f	g	h	i	j	k	l	m
	Gross carrying values of performing and non-performing exposures							Accumulated impairment and provisions and negative fair value adjustments due to credit risk				Collaterals and financial guarantees received	
	Of which performing but past due > 30 days and ≤ 90 days		Of which performing forborne	Of which non-performing			On performing exposures	On non-performing exposures		On non-performing exposures	Of which forborne exposures		
				Of which defaulted	Of which impaired	Of which forborne		Of which forborne		Of which forborne			
010	Debt securities												
020	Loans and advances												
030	Off-balance-sheet exposures												

Definitions

Columns

Gross carrying amount: See the definition in Template EU CRB-B.

Non-performing exposures: As defined in paragraph 145 in Annex V of the Commission Implementing Regulation (EU) No 680/2014 as amended by Commission Implementing Regulation (EU) 2015/227²³.

Forborne exposure: Forborne exposures as defined in paragraphs 163-167 in Annex V of the Commission Implementing Regulation (EU) No 680/2014. Depending on whether forborne exposures satisfy the required conditions set out in Annex V of that regulation, they can be identified as performing or as non-performing.

Impaired exposures: Non-performing exposures that are also considered to be impaired in accordance with the applicable accounting framework.

Defaulted exposures: Non-performing exposures that are also classified as defaulted in accordance with Article 178 of the CRR.

Accumulated impairment and provisions and negative fair value adjustments due to credit risk This shall include the amounts determined in accordance with paragraphs 48, 65 and 66 of Part Two of Annex V of the Commission Implementing Regulation (EU) No 680/2014.

Collateral and financial guarantees received: Maximum amount of collateral or guarantee that can be considered, which cannot exceed the carrying amount of the collateralised or guaranteed exposure.

²³ Corrigendum: Reference to Commission Implementing Regulation (EU) 2015/227 has been added compared to the original version.

91. Institutions should disclose the reconciliation of specific and general credit risk adjustments (shown separately) for impaired exposures required by Article 442(i) in accordance with Template EU CR2-A below.

92. This reconciliation of credit risk adjustments should be supplemented by a reconciliation of defaulted exposures, as specified in Template EU CR2-B.

Template 16: EU CR2-A – Changes in the stock of general and specific credit risk adjustments

Purpose: Identify the changes in an institution's stock of general and specific credit risk adjustments held against loans and debt securities that are defaulted or impaired.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Accumulated amounts of specific and general credit risk adjustments for impaired and defaulted loans and debt securities (general credit risk adjustments may be related to non-defaulted or non-impaired loans and debt securities).
Frequency: Semi-annual
Format: Fixed. The columns cannot be altered. Institutions may add additional rows.
Accompanying narrative: Institutions should describe the type of specific and general credit risk adjustments included in the template and are expected to explain the drivers of any significant changes in the amounts.

		a	b
		Accumulated specific credit risk adjustment	Accumulated general credit risk adjustment
1	Opening balance		
2	Increases due to amounts set aside for estimated loan losses during the period		
3	Decreases due to amounts reversed for estimated loan losses during the period		
4	Decreases due to amounts taken against accumulated credit risk adjustments		
5	Transfers between credit risk adjustments		
6	Impact of exchange rate differences		
7	Business combinations, including acquisitions and disposals of subsidiaries		
8	Other adjustments		
9	Closing balance		
10	Recoveries on credit risk adjustments recorded directly to the statement of profit or loss		
11	Specific credit risk adjustments directly recorded to the statement of profit or loss		

Definition

Columns

General and specific credit risk adjustments: Include amounts defined in Article 1 of the Commission Delegated Regulation (EU) No 183/2014 of 20 December 2013.

Rows

Increases due to amounts set aside for estimated loan losses during the period and decreases due to amounts reversed for estimated loan losses during the period should include (respectively) the amount of changes in specific and general credit risk adjustments that are due to changes in the creditworthiness of a counterparty—for instance, an

increase or a reversal in impairment losses in accordance with the accounting framework—and that do not imply a transfer between allowances. In this latter case, the institution should disclose the change in credit risk adjustments in the row ‘transfer between credit risk adjustments’.

Decreases due to amounts taken against accumulated credit risk adjustments: Impact of partial and total write-offs on the amount of specific and general credit risk adjustments. For a definition of write-off, see Template EU CRB-B.

Business combinations, including acquisitions and disposals of subsidiaries: Impact on the amount of accumulated specific and general credit risk adjustments of any transaction or other event in which an acquirer obtains control of one or more businesses.

Other adjustments: Balancing items that are necessary to enable total to reconcile.

Recoveries on credit risk adjustments recorded directly to the statement of profit or loss and Specific credit risk adjustments recorded directly to the statement of profit or loss: The rows should include (respectively) the direct reversal of, and the direct increase in, specific credit risk adjustments that—in accordance with the applicable accounting standards—are not made via an allowance account but directly reduce the gross carrying amount of an exposure.

Template 17: EU CR2-B – Changes in the stock of defaulted and impaired loans and debt securities

Purpose: Identify the changes in an institution’s stock of defaulted loans and debt securities.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Gross carrying values
Frequency: Semi-annual
Format: Fixed
Accompanying narrative: Banks are expected to explain the drivers of any significant changes in the amounts.

		a
		Gross carrying value defaulted exposures
1	Opening balance	
2	Loans and debt securities that have defaulted or impaired since the last reporting period	
3	Returned to non-defaulted status	
4	Amounts written off	
5	Other changes	
6	Closing balance	

Definitions:

Columns:

Gross carrying values: See the definition in Template EU CRB-B.

Defaulted exposures: Exposures under the IRB approach or the standardised approach that are defaulted in accordance with Article 178 of the CRR.

Rows:

Opening balance: Defaulted or impaired exposures at the beginning of the period. They should be disclosed net of partial and total write-offs that have taken place in prior periods and gross of (i.e. ignoring) impairments, regardless of whether the impairment is done via an allowance account or directly via a reduction in the gross carrying amount of the exposure.

Loans and debt securities that have defaulted since the last reporting period: Refers to any loan or debt securities that became marked as defaulted during the reporting period.

Return to non-defaulted status: Loans or debt securities that returned to non-default status during the reporting period.

Amounts written off: Amounts of impaired or defaulted exposures that have been either totally or partially written off during the period. For a definition of write-offs, see Template EU CRB-B.

Other changes: Balancing items that are necessary to enable total to reconcile.

Section C – General qualitative information on CRM

93. In the application of Article 453(a) to (e), institutions should provide information in Table EU CRC below.

Table 7: EU CRC – Qualitative disclosure requirements related to CRM techniques

Purpose: Provide qualitative information on the mitigation of credit risk.
Scope of application: The table is mandatory for all institutions included in paragraph 7 of these guidelines.
Content: Qualitative information
Frequency: Annual
Format: Flexible

Institutions should disclose:

Article 453(a)	When disclosing information on their netting policies and use of netting in accordance with Article 453(a), institutions should provide a clear description of CRM policies and processes concerning on-balance-sheet and off-balance-sheet netting. They could also indicate to what extent on-balance-sheet and off-balance-sheet netting have been used and their importance regarding credit risk management. Institutions could especially mention details about the techniques in use as the positions covered by on-balance-sheet netting agreements and the financial instruments included in the master netting agreements. Furthermore, the conditions necessary to assure effectiveness of these techniques and the controls in place for legal risk could also be described.
Article 453(b)	As part of their disclosures on the core features of their policies and processes for collateral valuation and management in accordance with Article 453(b), institutions could disclose: <ul style="list-style-type: none"> - The basis for the assessment and validation of the pledged collateral (market value, other values); - To what extent the calculated value of collateral is reduced by a haircut; - The process and methods in place to monitor the value of mortgage collateral and other physical collateral. Additionally, credit institutions could also disclose if there is a system of credit exposure limits in place and how the collateral accepted impacts the quantification of those limits.
Article 453(c)	When describing the main types of collateral taken in accordance with Article 453(c), institutions should provide a detailed description of the main types of collateral accepted to mitigate credit risk. Furthermore, as good practice, credit institutions could break down the accepted financial collateral according to type of credit operations collateralised and point out the rating and residual maturity of collaterals.
Article 453(d)	The description of the main types of guarantors and counterparties in credit derivatives and their creditworthiness to be disclosed in accordance with Article 453(d) should cover credit derivatives used for the purposes of reducing capital requirements, excluding those used as part of synthetic securitisation structures.

Article 453(e)	When disclosing information about market or credit risk concentrations within CRM taken in accordance with Article 453(e), institutions should provide an analysis of any concentration that arises due to CRM measures and may prevent CRM instruments from being effective. Concentrations in the scope of those disclosures could include concentrations by type of instrument used as collateral, entity (concentration by guarantor type and credit derivative providers), sector, geographical area, currency, rating or other factors that potentially impact the value of the protection and thereby reduce this protection.
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Section D – General quantitative information on CRM

94. In the application of Article 453(f) and (g), information on exposure value covered by financial collateral, other collateral, guarantees and credit derivatives is to be understood as information on outstanding secured exposures and the secured amount within those exposures. Information is to be disclosed in accordance with Template EU CR3 below.

Template 18: EU CR3 – CRM techniques – Overview

Purpose: Disclose the extent of the use of CRM techniques.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Carrying values. Institutions should include all collateral, financial guarantees and credit derivatives used as credit risk mitigants for all secured exposures, irrespective of whether the standardised approach or the IRB approach is used for RWA calculation. Any secured exposures by collateral, financial guarantees or credit derivatives (eligible or not eligible as CRM techniques under Part Three, Title II, Chapter 4 of the CRR) used to reduce capital requirements should be disclosed.
Frequency: Semi-annual
Format: Fixed. Where institutions are unable to categorise exposures secured by collateral, financial guarantees or credit derivatives into loans and debt securities, they can either (i) merge two corresponding cells, or (ii) divide the amount by the pro rata weight of gross carrying values. They should explain which method they have used.
Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant changes over the reporting period and the key drivers of such changes.

		a	b	c	d	e
		Exposures unsecured – Carrying amount	Exposures secured – Carrying amount	Exposures secured by collateral	Exposures secured by financial guarantees	Exposures secured by credit derivatives
1	Total loans					
2	Total debt securities					
3	Total exposures					
4	Of which defaulted					

Definitions
Columns:

Exposures unsecured – Carrying amount: The carrying amount of exposures (net of allowances/impairments) that do not benefit from a CRM technique, regardless of whether this technique is recognised under Part Three, Title II, Chapter 4 in the CRR.

Exposure - secured – Carrying amount: Carrying amount of exposures that have at least one CRM mechanism (collateral, financial guarantees, credit derivatives) associated with them. The allocation of the carrying amount of multi-secured exposures to their different CRM mechanisms is made by order of priority, starting with the CRM mechanism expected to be called first in the event of a loss, and within the limits of the carrying amount of the secured exposures.

Exposures secured by collateral: carrying amount of exposures (net of allowances/impairments) partly or totally secured by collateral. In case an exposure is secured by collateral and other CRM mechanism(s), the

carrying amount of the exposures secured by collateral is the remaining share of the exposures secured by collateral after consideration of the shares of the exposures already secured by other mitigation mechanisms expected to be called beforehand in the event of a loss, without considering overcollateralisation.

Exposures secured by financial guarantees: Carrying amount of exposures (net of allowances/impairments) partly or totally secured by financial guarantees. In case an exposure is secured by financial guarantees and other CRM mechanisms, the carrying amount of the exposures secured by financial guarantees is the remaining share of the exposures secured by financial guarantees after consideration of the shares of the exposures already secured by other mitigation mechanisms expected to be called beforehand in the event of a loss, without considering overcollateralisation.

Exposures secured by credit derivatives: Carrying amount of exposures (net of allowances/impairments) partly or totally secured by credit derivatives. In case an exposure is secured by credit derivatives and other CRM mechanism(s), the carrying amount of the exposures secured by credit derivatives is the remaining share of the exposures secured by credit derivatives after consideration of the shares of the exposures already secured by other mitigation mechanisms expected to be called beforehand in the event of a loss, without considering overcollateralisation.

4.9 Credit risk and CRM in the standardised approach

95. The following content in these guidelines specifies the disclosure requirements to be provided in accordance with Article 444 and Article 453 in the CRR. Information in the sections below relates only to instruments subject to Part Three, Title II, Chapter 2 (the standardised approach) in order to calculate their risk-weighted exposure amount for the purposes of Article 92(3)(a) in the same regulation.

96. Instruments subject to Part Three, Title II, Chapter 6 of the CRR (exposures to CCR), as well as instruments to which the requirements in Part Three, Title II, Chapter 5 (securitisation exposures) apply, are not covered by the disclosures in the following sections. Disclosures subject to Part Three, Title II, Chapter 6 of the regulation are specified in section 4.11 of these guidelines.

Section A – Qualitative information on the use of the standardised approach

97. In the application of Article 444(a) to (d) of the CRR, institutions should provide information specified in Table EU CRD below.

Table 8: EU CRD – Qualitative disclosure requirements on institutions’ use of external credit ratings under the standardised approach for credit risk

Purpose: Supplement the information on an institution’s use of the standardised approach with qualitative data on the use of external ratings.
Scope of application: The table applies to all institutions included in paragraph 7 of these guidelines that calculate the risk-weighted exposure amounts in accordance with Part Three, Title II, Chapter 2 of the CRR. In order to provide meaningful information to users, an institution may choose not to disclose the information requested in the table if the exposures and risk-weighted exposure amounts calculated in accordance with Part Three, Title II, Chapter 2 of the CRR are not material in accordance with Article 432(1) of the same regulation, as specified in the EBA Guidelines 2014/14. In accordance with that article and paragraph 19 of these guidelines, the institution should clearly state that fact. In addition, it should explain why it considers the information not to be meaningful to users and not material, including a description of the exposure classes concerned and the aggregate total risk exposure these exposure classes represent.
Content: Qualitative information
Frequency: Annual
Format: Flexible

A. For each of the exposure classes specified in Article 112 of the CRR for which institutions calculate the risk-weighted exposure amounts in accordance with Part Three, Title II, Chapter 2 of the CRR, institutions should disclose the following information:

Article 444(a)	(a)	Names of the external credit assessment institutions (ECAIs) and export credit agencies (ECAs) used by the institution, and the reasons for any changes over the reporting period.
Article 444(b)	(b)	The exposure classes for which each ECAI or ECA is used.
Article 444(c)	(c)	A description of the process used to transfer the issuer and issue credit ratings onto comparable assets in the banking book.
Article 444(d)	(d)	The alignment of the alphanumeric scale of each agency used with the credit quality steps prescribed in Part Three, Title II, Chapter 2 of the CRR, (except where the institution complies with

	the standard association published by the EBA).
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Section B – Quantitative information on the use of the standardised approach

98. Institutions should disclose the information on exposures covered by eligible financial collateral, other eligible collateral and guarantees or credit derivatives disclosed in the application of Article 453(f) and (g), as well as Template EU CR3 in these guidelines, by providing information on the impact of CRM under Part Three, Title II, Chapter 4 of the CRR on exposures that are risk-weighted in accordance with Chapter 2 of the same title in the same regulation (standardised approach).
99. Information on the impact of CRM techniques, in accordance with paragraph 95, should follow the specifications laid down in Template EU CR4. Template EU CR4 excludes exposures subject to the requirements in Part Three, Title II, Chapter 5 and Chapter 6 of the CRR (exposures subject to the CCR and securitisation risk framework).
-

Template 19: EU CR4 – Standardised approach – Credit risk exposure and CRM effects

<p>Purpose: Illustrate the effect of all CRM techniques applied in accordance with Part Three, Title II, Chapter 4 of the CRR, including the financial collateral simple method and the financial collateral comprehensive method in the application of Article 222 and Article 223²⁴ of the same regulation on standardised approach capital requirements' calculations. RWA density provides a synthetic metric on the riskiness of each portfolio.</p>
<p>Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines calculating the risk-weighted exposure amounts for credit risk in accordance with Part Three, Title II, Chapter 2 of the CRR.</p> <p>Template EU CR4 does not cover derivative instruments, repurchase transactions, securities or commodities lending or borrowing transactions, long settlement transactions and margin lending transactions subject to Part Three, Title II, Chapter 6 of the CRR or subject to Article 92(3) point (f) of the same regulation, whose regulatory exposure value is calculated according to the methods laid down in the aforementioned chapter.</p> <p>An institution that calculates the risk-weighted exposure amounts for credit risk also in accordance with Part Three, Title II, Chapter 3 of the CRR may regard the exposures and RWA amounts calculated in accordance with Chapter 2 as not material following Article 432(1) of the same regulation (as specified in the EBA Guidelines 2014/14). In such circumstances—and to provide only meaningful information to users—an institution may choose not to disclose Template EU CR4. In accordance with that article and paragraph 19 of these guidelines, the institution should clearly state that fact. In addition, it should explain why it considers the information in Template EU CR4 not to be meaningful to users. The explanation should include a description of the exposures included in the respective exposure classes and the aggregate total of RWAs from such exposure classes.</p>
<p>Content: Regulatory exposure amounts</p>
<p>Frequency: Semi-annual</p>
<p>Format: Fixed. (The columns cannot be altered. The rows reflect the exposure classes in Article 112 of the CRR.)</p>
<p>Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant change over the reporting period and the key drivers of such changes.</p>

		a	b	c	d	e	f
		Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
	Exposure classes	On-balance-sheet amount	Off-balance-sheet amount	On-balance-sheet amount	Off-balance-sheet amount	RWAs	RWA density
1	Central governments or central banks						
2	Regional government or local authorities						
3	Public sector entities						

²⁴ Corrigendum: Reference to “Article 222 and Article 223” has replaced the reference to “Article 221 and 22” that was included in the original version.

4	Multilateral development banks						
5	International organisations						
6	Institutions						
7	Corporates						
8	Retail						
9	Secured by mortgages on immovable property						
10	Exposures in default						
11	Exposures associated with particularly high risk						
12	Covered bonds						
13	Institutions and corporates with a short-term credit assessment						
14	Collective investment undertakings						
15	Equity						
16	Other items						
17	Total						

Definitions

Exposure classes: Exposure classes are defined in Article 112 to Article 134 in Part Three, Title II, Chapter 4 of the CRR.

Other items: Refers to assets subject to a specific risk weight set out in Article 134 in Part Three, Title II, Chapter 4 of the CRR. It also refers to assets not deducted in the application of Article 39 (tax overpayments, tax loss carrybacks and deferred tax assets that do not rely on future profitability), Article 41 (defined benefit pension fund assets), Article 46 and Article 469 (non-significant investments in CET1 of financial sector entities), Article 49 and Article 471 (participations in insurance entities whether or not insurance entities are supervised under the conglomerate directive), Article 60 and Article 475 (non-significant and significant direct, indirect and synthetic investments in additional tier 1 (AT1) of financial sector entities), Article 70 and Article 477 (insignificant and significant direct, indirect and synthetic holdings of T2 from a financial sector entity) when not allocated to other exposure classes, and to qualifying holdings outside the financial sector when they are not 1 250% risk-weighted (in the application of Article 36(k) in Part Two, Title I, Chapter 1 of the CRR).

Columns:

Exposures before CCF and CRM – On-balance-sheet amount: Institutions should disclose the on-balance-sheet exposure under the regulatory scope of consolidation (in accordance with Article 111 in the CRR), net of specific credit risk adjustments (as defined in the Commission Delegated Regulation (EU) No 183/2014) and write-offs (as defined in the applicable accounting framework), but before (i) the application of conversion factors as specified in the same article and (ii) the application of CRM techniques specified in Part Three, Title II, Chapter 4 of the CRR, except for on-balance-sheet and off-balance-sheet netting already disclosed in Template EU LI2. Exposure values for leases are subject to Article 134(7) of the same regulation.

Exposures before CCFs and CRM – Off-balance-sheet amount: Institutions should disclose the off-balance-sheet exposure value under the regulatory scope of consolidation, net of specific credit risk adjustments as defined in the Commission Delegated Regulation (EU) No 183/2014 but before the application of conversion factors in accordance with Article 111 in the CRR and before the effect of CRM techniques (in the application of Part Three, Title II, Chapter 4 of the same regulation) except for on-balance-sheet and off-balance-sheet netting already disclosed in Template EU LI2.

Credit exposure post CCF and CRM: Exposure value after taking into account specific credit risk adjustments as defined in the Commission Delegated Regulation (EU) No 183/2014 and write-offs as defined in the applicable accounting framework, all credit risk mitigants and CCFs. This is the amount to which the risk weights (according to Article 113 and Part Three, Title II, Chapter 2, Section 2 of the CRR) are applied. It is a net credit equivalent amount, after having applied CRM techniques and CCF.

RWA density: Total risk-weighted exposures/exposures post CCF and post CRM. The result of the ratio must be expressed as a percentage.

Linkages across templates

The amount in [EU CR4:14/c+ EU CR4:14/d] is equal to the amount in [EU CR5:17/total]

100. In the application of Article 444(e), institutions should provide Template EU CR5 (including a breakdown of exposures post conversion factor and post risk mitigation techniques).

Template 20: EU CR5 – Standardised approach

<p>Purpose: Present the breakdown of exposures under the standardised approach by asset class and risk weight (corresponding to the riskiness attributed to the exposure according to the standardised approach). The risk weights in template EU CR5 encompass all those assigned to each credit quality step in Article 113 to Article 134 in Part Three, Title II, Chapter 2 of the CRR.</p> <p>Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines calculating the risk-weighted exposure amounts in accordance with Part Three, Title II, Chapter 2 of the CRR.</p> <p>An institution risk weights exposures under Chapter 3 of the same regulation. The exposures and RWA amounts calculated in accordance with Chapter 2 are not material in accordance with Article 432(1) of the same regulation, as specified in the EBA Guidelines 2014/14. In such circumstances—and to provide only meaningful information to users—an institution may choose not to disclose Template EU CR5²⁵. In accordance with that article and paragraph 19 of these guidelines, the institution should clearly state that fact. In addition, it should explain why it considers the information in Template EU CR4 not to be meaningful to users. The explanation should include a description of the exposures included in the respective exposure classes and the aggregate total of RWAs from such exposure classes.</p>
<p>Content: Regulatory exposure values broken down by risk weights. Institutions should disclose exposures post conversion factor and post risk mitigation techniques. The risk weight used for the breakdown corresponds to the different credit quality steps applicable in accordance with Article 113 to Article 134 in Part Three, Title II, Chapter 2 of the CRR.</p>
<p>Frequency: Semi-annual</p>
<p>Format: Fixed</p>
<p>Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant changes over the reporting period and the key drivers of such changes.</p>

Exposure classes	Risk weight														Total	Of which unrated
	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%		

²⁵ Update: The reference to template EU CR5 has replaced the reference to the template EU CR4 that was included in the original version.

1	Central governments or central banks																		
2	Regional government or local authorities																		
3	Public sector entities																		
4	Multilateral development banks																		
5	International organisations																		
6	Institutions																		
7	Corporates																		
8	Retail																		
9	Secured by mortgages on immovable property																		
10	Exposures in default																		
11	Exposures associated with particularly high risk																		
12	Covered bonds																		
13	Institutions and corporates with a short-term credit assessment																		
14	Collective investment undertakings																		
15	Equity																		
16	Other items																		
17	Total																		

Definitions

Total: Total amount of on-balance-sheet and off-balance-sheet exposures under the regulatory scope of consolidation (in accordance with Article 111 in the CRR), net of specific credit risk adjustments (as defined in the Commission Delegated Regulation (EU) No 183/2014) and write-offs (as defined in the applicable accounting framework), after (i) the application of conversion factors as specified in the same article and (ii) the application of CRM techniques specified in Part Three, Title II, Chapter 4 of the CRR.

Exposure classes: Exposure classes are defined in Article 112 to Article 134 in Part Three, Title II, Chapter 4 of the CRR.

Other items: Refers to assets subject to a specific risk weight set out by Article 134 in Part Three, Title II, Chapter 4 of the CRR. It also refers to assets not deducted in the application of Article 39 (tax overpayments, tax loss carrybacks and deferred tax assets that do not rely on future profitability), Article 41 (defined benefit pension fund assets), Article 46 and Article 469 (non-significant investments in



CET1 of financial sector entities), Article 49 and Article 471 (participations in insurance entities whether or not insurance entities are supervised under the conglomerate directive), Article 60 and Article 475 (non-significant and significant direct, indirect and synthetic investments in AT1 of financial sector entities), Article 70 and Article 477 (insignificant and significant direct, indirect and synthetic holdings of T2 from a financial sector entity) when not allocated to other exposure classes, and to qualifying holdings outside the financial sector when they are not 1 250% risk-weighted, in the application of Article 36(k) in Part Two, Title I, Chapter 1 of the CRR.

Deducted: Exposures required to be deducted in accordance with Part Two of the CRR.

Unrated: Exposures for which a credit assessment by a nominated ECAI is not available and that are applied specific risk weights depending on their class, as specified in Article 113 to Article 134 in the CRR.

4.10 Credit risk and CRM in the IRB approach

101. The following sections in these guidelines specify the disclosure requirements to be provided in accordance with Article 452 and Article 453 in the CRR. Information in the sections below relates only to instruments subject to Part Three, Title II, Chapter 3 in order to calculate their risk-weighted exposure amount for the purposes of Article 92(3)(a) in the same regulation (the IRB approach).

102. Instruments subject to Part Three, Title II, Chapter 6 of the CRR (exposures to CCR), as well as instruments to which the requirements in Part Three, Title II, Chapter 5 (exposures to securitisation transactions) apply, are not covered by the disclosures in the following sections (exposures subject to the CCR and securitisation risk framework).

Section A – Qualitative information on the use of the IRB approach

103. In the application of Article 452(a) to (c), institutions should disclose information on the qualitative environment of the IRB models, following the specifications in Table EU CRE.

Table 9: EU CRE – Qualitative disclosure requirements related to IRB models

Purpose: Provide additional information on IRB models used to compute RWA.
Scope of application: The table applies to institutions included in paragraph 7 of these guidelines permitted to use AIRB or FIRB approaches for some or all of their exposures in accordance with Part Three, Title II, Chapter 3 of the CRR. To provide meaningful information to users, institutions should describe the main characteristics of the models used at the group level (according to the scope of regulatory consolidation as per Part One, Title II of the same regulation) and explain how the scope of models described was determined. The commentary should include the percentage of RWAs covered by the models for each of the institution’s regulatory portfolios.
Content: Qualitative information
Frequency: Annual
Format: Flexible

Institutions must provide the following information on their use of IRB models:

Article 452(b)(iv)	(a)	The description of the control mechanisms for rating systems in accordance with Article 452(b)(iv) should cover internal model development, controls and changes. When describing the independence, accountability and rating systems review, the role of the functions involved in the development, approval and subsequent changes of the credit risk models should be disclosed.
Article 452(b)(iv)	(b)	The description of the role of the functions referred to above should also include the relationships between the risk management function and the internal audit function, as well as the procedure to ensure the independence of the function in charge of the model review from the functions responsible for model development.
Article 452(b)(iv)	(c)	As part of information provided in accordance with Article 452(b)(iv), institutions should disclose the scope and main content of reporting related to credit risk models.
Article 452(a)	(d)	Scope of the supervisor’s acceptance of approach.
Article 452(a)	(e)	When disclosing information on the competent authority’s permission of the approach or approved transition in accordance with Article 452(a), institutions should indicate (for each of the exposure class) the part of EAD within the group (in percentage of total EAD) covered by

		the standardised, FIRB and AIRB approaches and the part of the exposure classes that are involved in a roll-out plan.
Article 452(c)	(f)	The disclosure of the internal rating processes by exposure classes listed in Article 452(c) should include the number of key models used with respect to each portfolio, with a brief discussion of the main differences among the models within the same portfolios.
Article 452(c)	(g)	<p>The disclosure of the internal rating processes by exposure classes listed in Article 452(c) should also include a description of the main characteristics of the approved models, in particular:</p> <p>(i) Definitions, methods and data for estimation and validation of PD, such as how PDs are estimated for low default portfolios, whether there are regulatory floors, and the drivers for differences observed between PD and actual default rates at least for the last three periods;</p> <p>And, where applicable:</p> <p>(ii) Definitions, methods and data for the estimation and validation of LGD, such as methods to calculate downturn LGD, how LGDs are estimated for low default portfolio, the time lapse between the default event and the closure of the exposure;</p> <p>(iii) Definitions, methods and data for estimation and validation of CCFs, including assumptions employed in the derivation of these variables.</p> <p>The description of the internal model characteristics for equities in accordance with Article 452(c)(v) should cover the models used for exposures under the IMA in accordance with Article 155(4).</p>

Section B – Quantitative information on the use of the IRB approach

104. In the application of Article 452(e) and (g), institutions should provide the information specified in Template EU CR6:

- The disclosure of the ‘exposure value’ (as required under Article 452(e)(i)) is satisfied via the disclosure of the original exposure values (both on-balance-sheet and off-balance-sheet) in columns (a) and (b) and with the disclosure of the EAD in column (d);
- The disclosure of ‘the amount of undrawn commitments and exposure-weighted average exposure values for each exposure class’ (as required by Article 452(e)(iii)) is satisfied via the disclosure of the ‘average CCF’;
- The disclosure of the exposure-weighted average risk weight (as required under Article 452(e)(ii)) is satisfied via the disclosure of the RWAs in combination with the RWA density;
- When disclosing information broken down by PD bands (as required under Article 452(e)), institutions should also provide the number of obligors that correspond to the number of individual PDs in this band. Approximation (a round number) is acceptable.

105. Institutions should also provide a breakdown of average PD and average LGD by exposure classes (columns e and g).

106. When disclosing value adjustments and provisions under Article 452(g), institutions should provide information on the development of value adjustments and provisions, including specific credit risk adjustments by exposure class and how they differ from past

experience, as well as a description of the factors that impacted the loss experience in the preceding period (Article 452(h)).

107. The breakdown by a sufficient number of obligor grades should be adjusted beyond the minimum required mandatory breakdown to the extent that an adjustment is necessary to provide a representative breakdown of the distribution of those grades used in the IRB approach by an institution, including where grades are aggregated. In the case where additional PD grades are inserted in Template EU CR6, grades can be aggregated if the breakdown remains representative of the distribution of grades used for the IRB approach.

Template 21: EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range

<p>Purpose: Provide main parameters used for the calculation of capital requirements for IRB models. This disclosure requirement aims at showing the exposure classes according to PD grades to allow for an assessment of the credit quality of the portfolio. The purpose of disclosing these parameters is to enhance the transparency of institutions' RWA calculations and the reliability of regulatory measures.</p>
<p>Scope of application: The template applies to institutions included in paragraph 7 of these guidelines using either the FIRB approach or the AIRB approach for some or all of their exposures in accordance with Part Three, Title II, Chapter 3 of the CRR. Where an institution makes use of both the FIRB approach and the AIRB approach, it should disclose one template for each approach used.</p>
<p>Content: Columns (a) and (b) are based on exposure values before CCF and CRM and columns (c) to (l) are regulatory values either determined by institutions or specified in the aforementioned chapter. All values in Template EU CR6 are based on the scope of regulatory consolidation as defined in Part One, Title II, Chapter 2 of the CRR.</p>
<p>Frequency: Semi-annual</p>
<p>Format: Fixed. The columns, their contents and the PD scale in the rows cannot be altered, although the PD master scale in the template is the minimum granularity that an institution should provide (an institution can decide to expand the breakdown in the PD master scale).</p>
<p>Accompanying narrative: Institutions are expected to supplement the template with a narrative to explain the effect of credit derivatives on RWAs.</p>

		a	b	c	d	e	f	g	h	i	j	k	l
	PD scale	Original on-balance-sheet gross exposures	Off-balance-sheet exposures pre-CCF	Average CCF	EAD post CRM and post CCF	Average PD	Number of obligors	Average LGD	Average maturity	RWAs	RWA density	EL	Value adjustments and provisions
Exposure class X													
	0.00 to <0.15												
	0.15 to <0.25												
	0.25 to <0.50												
	0.50 to <0.75												
	0.75 to <2.50												
	2.50 to <10.00												
	10.00 to <100.00												
	100.00 (Default)												
	Subtotal												

Total (all portfolios)												
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Definitions

Rows

Exposure class X: Includes the different exposure classes listed in Article 147 in Part Three, Title II, Chapter 3 of the CRR, with a further breakdown, within the exposure class 'corporate', of SMEs, specialised lending and purchased corporate receivables; and for the exposure class 'retail' identifying separately each of the categories of exposures to which the different correlations in Article 154(1) to (4) correspond. The equity exposures under each of the regulatory approaches in Article 155 should be disclosed separately. No breakdown by PD band is necessary for equity exposures treated under Article 155(2).

Default: The data on defaulted exposures in accordance with Article 178 of the CRR may be further broken down according to jurisdictions' definitions for categories of defaulted exposures.

Columns

PD scale: Exposures should be broken down according to the PD scale used in the template instead of the PD scale used by institutions in their RWA calculation. Institutions should map the PD scale they use in the RWA calculations into the PD scale provided in the template.

Original on-balance-sheet gross exposure: Amount of on-balance-sheet exposure, in accordance with Article 24(1) for financial statements on a consolidated basis and recital 39 for those on a solo basis, calculated in accordance with Article 166 to 168 of the CRR, before taking into account any credit risk adjustment made and before taking into account the effect of CRM techniques (except for CRM via on-balance-sheet and off-balance-sheet netting, as disclosed in Template EU LI2). Exposure values of derivatives, SFTs, etc. are covered in the CCR framework.

Off-balance-sheet exposure pre-conversion factor: Exposure value in accordance with Article 24(1) for financial statements on a consolidated basis and recital 39 for those on a solo basis in the CRR, without taking into account any credit risk adjustments made, the conversion factors specified in Article 166 of the same regulation and the effect of CRM techniques in accordance with Part Three, Title II, Chapter 4 of that regulation.

Average CCF: EAD off-balance-sheet exposure post-conversion factors applicable (as per Article 166 and Article 230(1), third sentence, in the CRR) to total off-balance-sheet exposure pre-conversion factor.

EAD post CRM and post CCF: Exposure value in accordance with Article 166 to 168 and Article 230(1), third sentence, in the CRR, as well as the impact of CRM in accordance with Part Three, Title II, Chapter 4 of that regulation. For equity exposures and other non-credit obligation assets, the exposure value is the accounting or nominal value reduced by specific credit risk adjustments for this exposure.

Number of obligors: Corresponds to the number of individual PDs in this band. Approximation (a round number) is acceptable.

Average PD: Obligor grade PD weighted by EAD post CRM and post CCF.

Average LGD: The obligor grade LGD weighted by EAD post CRM and post CCF. In accordance with Article 161 of the CRR, the LGD should be net (i.e. after impact of any of the CRM effects recognised in accordance with Part Three, Title II, Chapter 4 of the same regulation).

Average maturity: The obligor maturity in years weighted by EAD post CRM and post CCF; this parameter needs to be filled in only when it is used for the RWA calculation in accordance with Part Three, Title II, Chapter 3 of the CRR.

RWA density: Total RWAs determined in accordance with Part Three, Title II, Chapter 3 of the CRR to EAD post CRM and post CCF.

EL: The EL as calculated according to Article 158 in Part Three, Title II, Chapter 3 of the CRR.



Value adjustments and provisions: Specific and general credit risk adjustments in accordance with the Commission Delegated Regulation (EU) No 183/2014, additional value adjustments in accordance with Articles 34 and 110 of the CRR, as well as other own funds reductions related to exposures that are risk-weighted in accordance with Part Three, Title II, Chapter 3 of that regulation. These value adjustments and provisions are those considered for the implementation of Article 159 of that regulation.

108. In the application of Article 453(g), information to be disclosed on the total exposure that is covered by guarantees or credit derivatives (as already specified in Template EU CR3 in these guidelines) should be supplemented with information on the impact of credit derivatives on RWAs. This supplementary information is specified in Template EU CR7 below.

Template 22: EU CR7 – IRB approach – Effect on the RWAs of credit derivatives used as CRM techniques

Purpose: Illustrate the effect of credit derivatives on the IRB approach capital requirements' calculations. The pre-credit derivative RWAs before taking account of the credit derivatives mitigation effect has been selected to assess the impact of credit derivatives on RWAs. Template EU CR7 includes the impact of credit derivatives on RWAs due to the substitution effect and incidence on PD and LGD parameters in accordance with Part Three, Title II, Chapter 4 of the CRR.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines using the AIRB approach and/or FIRB approach for some or all of their exposures.
Content: RWAs subject to credit risk treatment.
Frequency: Semi-annual
Format: Fixed. The disclosures of RWAs calculated assuming the absence of recognition of the credit derivative as a CRM technique (pre-credit derivatives RWAs) and RWAs calculated taking into account the CRM technique impact of the credit derivatives (actual RWAs) should be presented separately for the FIRB approach and the AIRB approach exposure classes.
Accompanying narrative: Institutions may supplement the template with a narrative commentary to explain the effect of credit derivatives on the institution's RWAs.

		a	b
		Pre-credit derivatives RWAs	Actual RWAs
1	Exposures under FIRB		
2	Central governments and central banks		
3	Institutions		
4	Corporates – SMEs		
5	Corporates – Specialised lending		
6	Corporates – Other		
7	Exposures under AIRB		
8	Central governments and central banks		
9	Institutions		
10	Corporates – SMEs		
11	Corporates – Specialised lending		
12	Corporates – Other		
13	Retail – Secured by real estate SMEs		
14	Retail – Secured by real estate non-SMEs		
15	Retail – Qualifying revolving		
16	Retail – Other SMEs		
17	Retail – Other non-SMEs		

18	Equity IRB		
19	Other non-credit obligation assets		
20	Total		

Definitions

Pre-credit derivatives RWAs: Hypothetical RWAs calculated assuming the absence of recognition of the credit derivative as a CRM technique in accordance with Part Three, Title II, Chapter 4 of the CRR.

Actual RWAs: RWAs calculated taking into account the CRM technique impact of the credit derivatives in accordance with Part Three, Title II, Chapter 4 of Regulation (EU) No 575/2013.

109. Institutions disclosing information regarding capital requirements and RWAs (in the application of Article 92(3)(a) in the CRR and of Article 438(d) of the same regulation) for exposures subject to Part Three, Title II, Chapter 3 of the CRR (IRB approach) should provide information regarding the variations of RWAs over the period. Information to be provided on such variations is specified in Template EU CR8 below.

Template 23: EU CR8 – RWA flow statements of credit risk exposures under the IRB approach

Purpose: Present a flow statement explaining variations in the credit RWAs of exposures for which the risk-weighted amount is determined in accordance with Part Three, Title II, Chapter 3 of the CRR and the corresponding capital requirement as specified in Article 92(3)(a).
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines using the AIRB approach and/or FIRB approach.
Content: RWAs do not include RWAs for derivative instruments, repurchase transactions, securities or commodities lending or borrowing transactions, long settlement transactions and margin lending transactions subject to Part Three, Title II, Chapter 6 of the CRR or subject to Article 92(3) point (f) of the same regulation, whose regulatory exposure value is calculated according to the methods laid down in the aforementioned chapter. Changes in RWA amounts over the reporting period for each of the key drivers should be based on an institution's reasonable estimation of the figure.
Frequency: Quarterly
Format: Fixed. Columns and rows 1 and 9 cannot be altered. Institutions may add additional rows between rows 7 and 8 to disclose additional elements that contribute significantly to RWA variations.
Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant change over the reporting period and the key drivers of such changes.

		a	b
		RWA amounts	Capital requirements
1	RWAs as at the end of the previous reporting period		
2	Asset size		
3	Asset quality		
4	Model updates		
5	Methodology and policy		
6	Acquisitions and disposals		
7	Foreign exchange movements		
8	Other		
9	RWAs as at the end of the reporting period		

Definitions

Asset size: Organic changes in book size and composition (including the origination of new businesses and maturing loans) but excluding changes in book size due to acquisitions and disposal of entities.

Asset quality: Changes in the assessed quality of the institution's assets due to changes in borrower risk, such as rating grade migration or similar effects.

Model updates: Changes due to model implementation, changes in model scope, or any changes intended to address model weaknesses.

Methodology and policy: Changes due to methodological changes in calculations driven by regulatory policy changes, including both revisions to existing regulations and new regulations.

Acquisitions and disposals: Changes in book sizes due to acquisitions and disposal of entities.

Foreign exchange movements: Changes arising from foreign currency translation movements.

Other: This category must be used to capture changes that cannot be attributed to any other category. Institutions should add additional rows between rows 7 and 8 to disclose other material drivers of RWA movements over the reporting period.

110. When providing information on the backtesting of PD in accordance with the disclosures required on the backtesting of EL by Article 452(i) in the CRR, institutions should provide information specified in Template EU CR9 and compare (by exposure class and internal grade) the PD with the actual default rate.

111. When disclosing information on the backtesting of other model parameters, institutions may choose to disclose information in a similar fashion as backtesting for PD, as specified in Template EU CR9. In particular, when disclosing information on the backtesting of model parameters other than PDs, institutions should:

- Disclose the backtesting at the level of regulatory exposure classes in accordance with Articles 147 and 155 of the CRR, with further details if appropriate;
- Define the model estimates that are backtested (including the actual observations against which they are backtested) and mention whether any limitations in the possibility to compare the model estimates and the actual observations chosen. Therefore, when providing a backtesting of EL against actual losses, an institution should define the concept of EL and the concept of actual losses (including the observation period for these EL and actual losses), and describe any difference between these two concepts that may make the comparison between EL and actual losses not straightforward;
- For each exposure class, distinguish the model estimates and the actual observations related to defaulted and non-defaulted obligors;
- For each exposure class, quantify (if relevant) the number of defaulted and non-defaulted obligors;
- Disclose information on backtesting for all model parameters, accompanied with indicators or with information of backtesting from previous periods that allows users to assess the performance of the rating models over a sufficiently long time horizon (at a minimum, 3 years).

Template 24: EU CR9 – IRB approach – Backtesting of PD per exposure class

Purpose: Provide backtesting data to validate the reliability of PD calculations. In particular, the template compares the PD used in IRB capital calculations with the effective default rates of institutions obligors. A minimum 5-year average annual default rate is required to compare the PD with a ‘more stable’ default rate, although an institution may use a longer historical period that is consistent with its actual risk management practices.

Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines using the AIRB approach and/or the FIRB approach. Where an institution makes use of an FIRB approach for certain exposures and an AIRB approach for others, it must disclose two separate sets of portfolio breakdowns in separate templates.

To provide meaningful information to users on the backtesting of the institution’s internal models through this template, the institution must include the key models used at the group level (according to the scope of regulatory consolidation) and explain how the scope of models described was determined. The commentary must include the percentage of RWAs covered by the models for which backtesting results are shown here for each of the institution’s regulatory portfolios.

Content: Modelling parameters used in IRB calculation.

Frequency: Annual

Format: Flexible. ‘Exposure class X’ includes separately the different exposure classes listed in Article 147 in Part Three, Title II, Chapter 3 of the CRR, with a further breakdown within the exposure class ‘corporate’ of: SMEs, specialised lending and purchased corporate receivables; and for the exposure class ‘retail’ identifying separately each of the categories of exposures to which the different correlations in Article 154(1) to (4) correspond. The equity exposures under each of the regulatory approaches in Article 155 should be disclosed separately. No breakdown by PD band is necessary for equity exposures treated under Article 155(2).

Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant changes over the reporting period and the key drivers of such changes. Institutions may wish to supplement the template when disclosing the amount of exposures and the number of obligors whose defaulted exposures have been cured in the year.

a	b	c	d	e	f		g	h	i
					End of previous year	End of the year			
Exposure class	PD range	External rating equivalent	Weighted average PD	Arithmetic average PD by obligors	Number of obligors		Defaulted obligors in the year	Of which new obligors	Average historical annual default rate

Definitions

PD range: Refers to PD as attributed at the beginning of the period.

External rating equivalent: One column has to be filled in for each relevant rating agency for the PD estimates authorised for prudential purposes in the jurisdictions where the institution operates. These columns should only be filled for PD estimates subject to Article 180(1)(f).

Weighted average PD: The same as reported in template EU CR6.

Arithmetic average PD by obligors: PD within range by number of obligors within the range.

Number of obligors (two sets of information are required): (i) The number of obligors at the end of the previous year; and (ii) the number of obligors at the end of the year subject to reporting.

Defaulted obligors in the year: Number of defaulted obligors during the year in accordance with Article 178 of the CRR.

Of which new obligors defaulted in the year: Number of obligors having defaulted during the last 12-month period that were not funded at the end of the previous financial year.

Average historical annual default rate: The 5-year average of the annual default rate (obligors at the beginning of each year that have defaulted during that year/total obligor holdings at the beginning of the year) is a minimum. The institution may use a longer historical period that is consistent with the institution's actual risk management practices.

4.11 CCR

112. The following sections in these guidelines specify the disclosure requirements to be provided in accordance with Article 439, Article 444 and Article 452 in the CRR regarding instruments in the trading and in the non-trading books for which the exposure value is measured in accordance with Part Three, Title II, Chapter 6 of the same regulation (the CCR framework) and the risk-weighting for the purpose of Article 92(3)(f) in that regulation is done in accordance with the requirements in Part Three, Title II, Chapters 2 or 3 (credit risk framework) of that regulation.

113. Specific information is also included on those instruments referred to in the above paragraphs for which a specific own funds requirement is calculated either in accordance with Part Three, Title II, Chapter 6, Section 9 (own funds requirements for exposures to a CCP) of the CRR or for the purposes of Article 92(3)(d) in accordance with Part Three, Title VI (capital requirements for CVA) of the CRR.

Section A – Information on regulatory measures

114. In the application of Article 439(e), (f) and (i) of the CRR, institutions should disclose information specified in Template EU CCR1 regarding the methods used to measure the exposure value of instruments subject to capital requirements for CCR in the application of Article 92(3)(f), as well as the net exposure of these instruments.

Template 25: EU CCR1 – Analysis of CCR exposure by approach

Purpose: Provide a comprehensive view of the methods used to calculate CCR regulatory requirements and the main parameters used within each method.	
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines with instruments for which the exposure value is calculated in accordance with Part Three, Title II, Chapter 6 of the CRR.	
Content: Regulatory exposures, RWAs and parameters used for RWA calculations for all exposures subject to the CCR framework (excluding CVA charges or exposures cleared through a CCP).	
Frequency: Semi-annual	
Format: Fixed	

		a	b	c	d	e	f	g
		Notional	Replacement cost/current market value	Potential future credit exposure	EEPE	Multiplier	EAD post CRM	RWAs
1	Mark to market							
2	Original exposure							

3	Standardised approach							
4	IMM (for derivatives and SFTs)							
5	<i>Of which securities financing transactions</i>							
6	<i>Of which derivatives and long settlement transactions</i>							
7	<i>Of which from contractual cross-product netting</i>							
8	Financial collateral simple method (for SFTs)							
9	Financial collateral comprehensive method (for SFTs)							
10	VaR for SFTs							
11	Total							

Definitions

Financial collateral simple method (for SFTs) and Financial collateral comprehensive method (for SFTs): Repurchase transactions, securities or commodities lending or borrowing transactions, long settlement transactions and margin lending transactions for which institutions have chosen to determine the exposure value in accordance with Part Three, Title II, Chapter 4 (CRM), as opposed to Chapter 6 of the CRR in accordance with Article 271(2) of the same regulation.

VaR for SFTs: Repurchase transactions, securities or commodities lending or borrowing transactions, margin lending transactions, or other capital market-driven transactions other than derivative transactions for which—in accordance with Article 221 in the CRR—the exposure value is calculated using an IMA that takes into account correlation effects between security positions subject to the master netting agreement, as well as the liquidity of the instruments concerned.

Replacement cost: The replacement cost under the mark-to-market method is the current exposure value, meaning the larger of zero and the market value of a transaction or portfolio of transactions within a netting set with a counterparty that would be lost upon the default of the counterparty, assuming no recovery on the value of those transactions in insolvency or liquidation.

Current market value: Under the standardised approach, the current market value is the net market value of the portfolio of transactions within a netting set—meaning that both negative and positive values are used in computing the current market value.

Potential future credit exposure: This is, for the mark-to-market method, the product of the notional amounts or underlying values as applicable by specific percentages set in Article 274 of the CRR.

Effective expected positive exposure (EEPE): The weighted average of effective expected exposure over the first year of a netting set or, if all the contracts within the netting set mature within less than 1 year, over the time period of the longest maturity contract in the netting set, where the weights are the proportion of the entire time period that an individual expected exposure represents.

Multiplier: Value of the β under the standardised approach (Article 276 of the CRR), and of the α under the IMA (Article 284 of the CRR). The value disclosed should be the value actually used in the measurement of the exposure, be they regulatory values or the value determined by institutions after approval by competent authorities.

EAD post CRM: Exposure value calculated according to the methods laid down in Part Three, Title II Chapter 6, Sections 2, 3, 4, 5, 6 and 7 of the CRR. This refers to the amount relevant for the capital requirements calculation having applied CRM techniques, CVAs and specific wrong-way adjustments.

115. In the application of Article 439(e) and (f), the exposure value and the risk exposure amount of transactions subject to capital requirements for CVAs(in accordance with Part Three, Title VI of the CRR should be disclosed separately following the specifications in Template EU CCR2.

Template 26: EU CCR2 – CVA capital charge

Purpose: Provide CVA regulatory calculations (with a breakdown by standardised and advanced approaches).
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines with exposures subject to CVA capital charges in accordance with Part Three, Title VI, Article 382 in the CRR.
Content: RWAs and corresponding EAD.
Frequency: Semi-annual
Format: Fixed
Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant changes over the reporting period and the key drivers of such changes.

		a	b
		Exposure value	RWAs
1	Total portfolios subject to the advanced method		
2	(i) VaR component (including the 3× multiplier)		
3	(ii) SVaR component (including the 3× multiplier)		
4	All portfolios subject to the standardised method		
EU4	Based on the original exposure method		
5	Total subject to the CVA capital charge		

Definitions

Exposure value: Exposure value that is determined in accordance with Part Three, Title II, Chapter 6 or (in the case of transactions in the scope of Article 271(2), Chapter 4) for transactions that are in the scope of Title VI of the CRR. The exposure value is the value used in the calculation of CVA capital requirements, For transactions treated under the original exposure method, the exposure value is the value that has been used for computing RWAs.

RWA: Own funds requirements for CVA risk calculated via the chosen method multiplied by 12.5 in accordance with Article 92(4).

VaR component (including the 3× multiplier): RWAs for CVA risk obtained via an implementation of the formula in Article 383 of the CRR using VaR calculation based on internal models for market risk (the use of current parameter calibrations for expected exposure as set out in the first subparagraph of Article 292(2)). The calculation includes the use of a multiplier that is at least set at 3.

SVaR component (including the 3× multiplier): RWAs for CVA risk obtained via an implementation of the formula in Article 383 of the CRR using SVaR calculation based on internal models for market risk (the use of stressed parameters for the calibration of the formula). The calculation includes the use of a multiplier that is at least set at 3.

Advanced CVA capital charge: Exposure value and associated RWAs for the portfolios subject to the advanced method in accordance with Article 383 in the CRR.

Standardised CVA capital charge: Exposure value and associated RWAs for the portfolios subject to the advanced method in accordance with Article 383 in the CRR. The amount of the standardised capital charge is calculated in accordance with paragraph 104 of Annex 4 of the Basel framework or with the definition provided in domestic regulation if the use of external credit ratings is not permitted.

Original exposure method: Simplified approach to calculating CVA capital requirements, in accordance with Article 385 in the CRR.

116. In the application of Article 439(e) and (f), institutions should disclose the specific information specified in Template EU CCR8 on the exposures to derivatives with CCPs and their associated risk exposure amounts.

Template 27: EU CCR8 – Exposures to CCPs

Purpose: Provide a comprehensive picture of the institution’s exposures to CCPs in the scope of Part Three, Title II, Chapter 6, Section 9 of the CRR. In particular, the template includes all types of exposures (due to operations, margins, and contributions to default funds) and related capital requirements.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: EAD and RWAs corresponding to exposures to CCPs.
Frequency: Semi-annual
Format: Fixed. Institutions are requested to provide a breakdown of the exposures by qualifying and non-qualifying CCPs as applicable for the requirements in Part Three, Title II, Chapter 6, Section 9 of the CRR.
Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant changes over the reporting period and the key drivers of such changes.

		a	b
		EAD post CRM	RWAs
1	Exposures to QCCPs (total)		
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which		
3	(i) OTC derivatives		
4	(ii) Exchange-traded derivatives		
5	(iii) SFTs		
6	(iv) Netting sets where cross-product netting has been approved		
7	Segregated initial margin		
8	Non-segregated initial margin		
9	Prefunded default fund contributions		
10	Alternative calculation of own funds requirements for exposures		
11	Exposures to non-QCCPs (total)		
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which		
13	(i) OTC derivatives		
14	(ii) Exchange-traded derivatives		
15	(iii) SFTs		
16	(iv) Netting sets where cross-product netting has been approved		
17	Segregated initial margin		
18	Non-segregated initial margin		
19	Prefunded default fund contributions		
20	Unfunded default fund contributions		

Definitions

Exposures to CCPs: Contracts and transactions listed in Article 301 of the CRR for as long as they are outstanding with a CCP, including exposures to CCP-related transactions for which (as per Article 303 of the CRR) the own funds requirements are calculated

in accordance with Part Three, Title II, Chapter 6, Section 9 of the CRR. A CCP-related transaction means a contract or a transaction listed in Article 301(1) of the same regulation between a client and a clearing member that is directly related to a contract or a transaction listed in that paragraph between that clearing member and a CCP. The concepts of clearing member and client are defined in Article 300 of the CRR.

EAD post CRM: Exposure value determined in accordance with Part Three, Title II, Chapter 6 of the CRR for transactions in the scope of Section 9 of that chapter, after the application of the relevant adjustments provided for by Article 304, Article 306, Article 308 and Article 310 of that section. An exposure can be a trade exposure, as defined in Article 4(91) of the CRR. The exposure value disclosed is the amount relevant for the capital requirements calculation in accordance with Part Three, Title II, Chapter 6, Section 9 of the CRR, considering the requirements in Article 497 of that regulation during the transitional period provided for by that article.

Qualifying CCP (QCCP): A CCP that has been either authorised in accordance with Article 14 of Regulation (EU) No 648/2012 or recognised in accordance with Article 25 of that regulation.

Initial margin: Margins collected by the CCP to cover potential future exposure to clearing members providing the margin and, where relevant, interoperable CCPs in the interval between the last margin collection and the liquidation of positions following a default of a clearing member or of an interoperable CCP default. 'Margins' means margins as referred to in Article 41 of Regulation (EU) No 648/2012, which may include initial margins (as defined in the previous sentence) and variation margins (which are margins collected or paid out to reflect current exposures resulting from actual changes in market price). For the purposes of this template, initial margin does not include contributions to a CCP for mutualised loss-sharing arrangements (i.e. in cases where a CCP uses initial margin to mutualise losses among the clearing members, it will be treated as a default fund exposure).

Prefunded default fund contributions: A contribution to the default fund of a CCP that is paid in by an institution. 'Default fund' has the same meaning as in Article 4(89) of the CRR.

Unfunded default fund contributions: Contributions that an institution acting as a clearing member has contractually committed to provide to a CCP after the CCP has depleted its default fund to cover the losses it incurred following the default of one or more of its clearing members.

Segregated: Refers to collateral that is held in a bankruptcy-remote manner in the meaning of Article 300 in the CRR.

Unsegregated: Refers to collateral that is not held in a bankruptcy-remote manner.

Alternative calculation of own funds requirements for exposures: Includes the own funds requirements as calculated according to Article 310 of the CRR multiplied by 12.5.

Section B – Information by regulatory risk-weighting approach

117. When providing information required in accordance with Article 444(e), institutions should separately disclose exposure values, which (in accordance with Article 107 in said regulation) are subject to Part Three, Title II, Chapter 2 (standardised approach) for the purpose of Article 92(3)(a) and for the purpose of Article 92(3)(f). Information on instruments for which Article 92(3)(f) applies should be disclosed in Template EU CCR3.

Template 28: EU CCR3 – Standardised approach – CCR exposures by regulatory portfolio and risk

Purpose: Provide a breakdown of CCR exposures calculated in accordance with Part Three, Title II, Chapter 6 of the CRR and risk-weighted according to Chapter 3 of the same title: by portfolio (type of counterparties) and by risk weight (riskiness attributed according to the standardised approach).
Scope of application: The template is mandatory for all institutions included in paragraph 7 of these guidelines using the credit risk standardised approach to compute RWAs for CCR exposures in accordance with Article 107 in the CRR, irrespective of the approach used to determine EAD in accordance with Part Three, Title II, Chapter 6 of the same regulation. In order to provide meaningful information to users, an institution may choose not to disclose the information requested in the template if the exposures and risk-weighted exposure amounts determined in accordance with Part Three, Title II, Chapter 2 of the CRR are not material in accordance with Article 432(1) of the same regulation, as specified in the EBA Guidelines 2014/14. In accordance with that article and paragraph 19 of these guidelines, the institution should clearly state that fact. In addition, it should explain why it considers the information not to be meaningful to users and not material, including a description of the exposure classes concerned and the aggregate total risk exposure these exposure classes represent.
Content: Credit exposure amounts.
Frequency: Semi-annual
Format: Fixed

	Exposure classes	Risk weight										Total	Of which unrated	
		0%	2%	4%	10%	20%	50%	70%	75%	100%	150%			Others
1	Central governments or central banks													
2	Regional government or local authorities													
3	Public sector entities													
4	Multilateral development banks													
5	International organisations													
6	Institutions													
7	Corporates													
8	Retail													
9	Institutions and corporates with a short-term credit assessment													

10	Other items														
11	Total														

Definitions

Total: Total amount of on-balance-sheet and off-balance-sheet exposure under the regulatory scope of consolidation in accordance with Article 111 in the CRR net of specific credit risk adjustments (as defined in the Commission Delegated Regulation (EU) No 183/2014) and write-offs as defined in the applicable accounting framework, after (i) the application of conversion factors as specified in the same article and (ii) the application of CRM techniques specified in Part Three, Title II, Chapter 4 of the CRR.

Exposure classes: Exposure classes are defined in Article 112 to Article 134 in Part Three, Title II, Chapter 4 of the CRR.

Other items: This refers to assets subject to a specific risk weight set out in Article 134 in Part Three, Title II, Chapter 4 of the CRR. It also refers to assets not deducted in the application of Article 39 (tax overpayments, tax loss carrybacks and deferred tax assets that do not rely on future profitability), Article 41 (defined benefit pension fund assets), Article 46 and Article 469 (non-significant investments in CET1 of financial sector entities), Article 49 and Article 471 (participations in insurance entities whether or not insurance entities are supervised under the conglomerate directive), Article 60 and Article 475 (non-significant and significant indirect and investments in AT1 of financial sector entities), Article 70 and Article 477 (insignificant and significant indirect and synthetic holdings of T2 from a financial sector entity) when not allocated to other exposure classes, and to qualifying holdings outside the financial sector when they are not 1 250% risk-weighted in the application of Article 36(k) in Part Two, Title I, Chapter 1 of the CRR.

Unrated: Exposures for which a credit assessment by a nominated ECAI is not available and that have specific risk weights applied depending on their class, as specified in Article 113 to Article 134 in the CRR.

118. When providing information required in accordance with Article 452(e) in the CRR, institutions should provide separate disclosures for those exposures that—in accordance with Article 107 in said regulation—are subject to Part Three, Title II, Chapter 3 of that regulation for the purpose of Article 92(3)(a) and for the purpose of Article 92(3)(f) of the same regulation. Information on instruments for which Article 92(3)(f) applies should be disclosed in template CCR4.

Template 29: EU CCR4 – IRB approach – CCR exposures by portfolio and PD scale

<p>Purpose: Provide all relevant parameters used for the calculation of CCR capital requirements for IRB models.</p>
<p>Scope of application: The template is mandatory for all institutions included in paragraph 7 of these guidelines using an AIRB approach or an FIRB approach to compute RWAs for CCR exposures in accordance with Article 107 in the CRR, whatever the CCR approach used to determine EAD in accordance with Part Three, Title II, Chapter 6 of that regulation. Where an institution makes use of an FIRB approach for certain exposures and an AIRB approach for others, it must disclose two separate sets of portfolio breakdowns in two separate templates.</p> <p>To provide meaningful information, the institution should include (in this template) the key models used at the group level (according to the scope of regulatory consolidation) and explain how the scope of models described in this template was determined. The commentary should include the percentage of RWAs covered by the models shown here for each of the institution's regulatory portfolios.</p>
<p>Content: RWAs and parameters used in RWA calculations for exposures subject to the CCR framework (excluding CVA charges or exposures cleared through a CCP) and where the credit risk approach used (in accordance with Article 107 in the CRR) to compute RWAs is an IRB approach.</p>
<p>Frequency: Semi-annual</p>

Format: Fixed. Columns and PD scales in the rows are fixed.

Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant changes over the reporting period and the key drivers of such changes.

		a	b	c	d	e	f	g
	PD scale	EAD post CRM	Average PD	Number of obligors	Average LGD	Average maturity	RWAs	RWA density
Exposure class X								
	0.00 to <0.15							
	0.15 to <0.25							
	0.25 to <0.50							
	0.50 to <0.75							
	0.75 to <2.50							
	2.50 to <10.00							
	10.00 to <100.00							
	100.00 (Default)							
	Subtotal							
	Total (all portfolios)							

Definitions

Rows

Exposure class X: Includes separately the different exposure classes listed in Article 147 in Part Three, Title II, Chapter 3 of the CRR.

Default: The data on defaulted exposures in accordance with Article 178 of the CRR may be further broken down according to jurisdictions' definitions for categories of defaulted exposures.

Columns

PD scale: Exposures should be broken down according to the PD scale used in the template instead of the PD scale used by institutions in their RWA calculation. Institutions should map the PD scale they use in the RWA calculations onto the PD scale provided in the template.

EAD post CRM: Exposure value in accordance with Articles 166 to 168 and Article 230(1), third sentence, as well as Article 271 in the CRR. It also refers to the impact of CRM in accordance with Part Three, Title II, Chapter 4 of that regulation. For equity exposures and other non-credit obligation assets, the exposure value is the accounting or nominal value reduced by specific credit risk adjustments for this exposure.

Number of obligors: Corresponds to the number of individual PDs in this band. Approximation (round number) is acceptable.

Average PD: Obligor grade PD weighted by EAD post CRM.

Average LGD: The obligor grade LGD weighted by EAD post CRM. In accordance with Article 161 of the CRR, the LGD should be net—meaning after consideration of any CRM effect recognised in accordance with Part Three, Title II, Chapter 4 of the same regulation.



Average maturity: The obligor maturity in years weighted by EAD post CRM. This parameter needs to be filled in only when it is used for the RWA calculation in accordance with Part Three, Title II, Chapter 3 of the CRR.

RWA density: Total RWAs determined in accordance with Part Three, Title II, Chapter 3 of the CRR to EAD post CRM.

119. When providing information in the application of Article 92(3) and (4) as well as Article 438(d) in the CRR, institutions should provide separate disclosures on the capital requirements and RWAs associated with exposures subject to Part Three, Title II, Chapter 3 (the IRB approach) and measured in accordance with Chapter 6 (the CCR framework) of the CRR. These disclosures should be supplemented with information regarding the variations of RWAs over the period as specified in Template EU CCR7.

Template 30: EU CCR7 – RWA flow statements of CCR exposures under the IMM

Purpose: Present a flow statement explaining changes in the CCR RWAs determined under the IMM for CCR (derivatives and SFTs) in accordance with Part Three, Title II, Chapter 6 of the CRR.
Scope of application: The template is mandatory for all institutions included in paragraph 7 of these guidelines using the IMM for measuring EAD of exposures subject to the CCR framework in accordance with Part Three, Title II, Chapter 6 of Regulation (EU) No 575/2013, irrespective of the credit risk approach used to compute RWAs from EAD.
Content: RWAs corresponding to CCR (credit risk shown in EU CR8 is excluded). Changes in RWA amounts over the reporting period for each of the key drivers should be based on an institution's reasonable estimation of the figure.
Frequency: Quarterly
Format: Fixed. Columns and rows 1 and 9 are fixed. Institutions may add additional rows between rows 7 and 8 to disclose additional elements that contribute to RWA variations.
Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant change over the reporting period and the key drivers of such changes.

		a	b
		RWA amounts	Capital requirements
1	RWAs as at the end of the previous reporting period		
2	Asset size		
3	Credit quality of counterparties		
4	Model updates (IMM only)		
5	Methodology and policy (IMM only)		
6	Acquisitions and disposals		
7	Foreign exchange movements		
8	Other		
9	RWAs as at the end of the current reporting period		

Definitions

Asset size: Organic changes in book size and composition (including the origination of new businesses and maturing exposures) but excluding changes in book size due to acquisitions and disposal of entities.

Credit quality of counterparties: Changes in the assessed quality of the institution's counterparties as measured under the credit risk framework, whatever approach the institution uses. This row also includes potential changes due to IRB models when the institution uses an IRB approach.

Model updates: Changes due to model implementation, changes in model scope, or any changes intended to address model weaknesses. This row addresses only changes in the IMM model.

Methodology and policy: Changes due to methodological changes in calculations driven by regulatory policy changes, such as new regulations (only in the IMM model).

Acquisitions and disposals: Changes in book sizes due to acquisitions and disposal of entities.

Foreign exchange movements: Changes arising from foreign currency translation movements.

Other: This category is intended to be used to capture changes that cannot be attributed to the above categories. Institutions should add additional rows between rows 7 and 8 to disclose other material drivers of RWA movements over the reporting period.

Section D – Other information on CCR

120. In the application of Article 439(e), institutions should disclose information on the impact of netting and collateral held on the exposure value for derivative and SFTs in accordance with the specifications in Template EU CCR5-A.

Template 31: EU CCR5-A – Impact of netting and collateral held on exposure values

Purpose: Provide an overview of the impact of netting and collateral held on exposures for which the exposure value is measured as per Part Three, Title II, Chapter 6 of the CRR, including exposures arising from transactions cleared through a CCP.

Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.

Content: Fair value

Frequency: Semi-annual

Format: Flexible for rows. Fixed for columns.

Accompanying narrative: Institutions are expected to supplement disclosures by types of underlying exposures or by types of instruments when there exists concentrations in specific underlying exposures/instruments deemed material in accordance with the EBA Guidelines 2014/14.

		a	b	c	d	e
		Gross positive fair value or net carrying amount	Netting benefits	Netted current credit exposure	Collateral held	Net credit exposure
1	Derivatives					
2	SFTs					
3	Cross-product netting					
4	Total					

Definitions:

Rows:

Derivatives: Any derivative instrument in accordance with the accounting framework and listed in Annex I of the CRR that has its exposure value calculated in accordance with Part Three, Title II, Chapter 6 of that regulation. It includes any long settlement transactions as per Article 271 of the same regulation that do not qualify as SFTs.

SFTs: Any repurchase transactions, securities or commodities lending or borrowing transactions in accordance with the applicable accounting framework that has its exposure value calculated in accordance with Part Three, Title II, Chapter 6 of the CRR. It also includes any margin lending transactions (as per Article 271 of the same regulation) that do not otherwise qualify as derivatives.

Cross-product netting: Refers to exposures, including both derivatives and SFTs netted at counterparty level.

Columns:

Gross positive fair value or net carrying amount: Regardless of the accounting requirements regarding the booking of derivatives and SFTs on-balance-sheet or off-balance-sheet, the gross fair value or net carrying amount (as applicable) should be the exposure value before CRM. Fair value should be mark to model or mark to market and as determined under the relevant accounting framework after the application of the prudent value adjustments in accordance with Article 34 and Article 105 of the CRR as specified in the Commission Delegated Regulation (EU) No 2016/101. Net carrying amount is the carrying amount of exposures after specific credit risk adjustments. While the measurement approach depends on the accounting requirements for exposures from the non-trading book, the gross fair value should be disclosed for exposures from the trading book. Fair value and net carrying amounts should be measured at the same level as required in the applicable accounting standards.

Netting benefits: Reduction in the gross positive fair value or net carrying amount due to the use of legally enforceable netting agreements in the application of Part Two, Title III, Chapter 4 and Chapter 6 of the CRR. Any netting that would not be eligible under these chapters should be disclosed separately within column (b).

Netted current exposure: The larger of zero and the market value of a transaction or portfolio of transactions within a netting set with a counterparty that would be lost upon the default of the counterparty, assuming no recovery on the value of those transactions in insolvency or liquidation.

Collateral held: Impact of collateral on the netted current exposure, including volatility adjustments in the application of Part Two, Title III, Chapter 4 and Chapter 6 of the CRR. The impact of any collateral that would not be eligible for CRM or that would have no impact on the netted current credit exposure in the application of these chapters should be disclosed separately within column (d).

Net credit exposure: This is the credit exposure after considering the benefits from both legally enforceable netting agreements and collateral arrangements. This exposure value may differ from the EAD value disclosed in Template EU CCR1, due to the other parameters for the calculation of the regulatory exposure values not being disclosed in Template EU CCR5-A.

121. Collateral received should then be disaggregated by types of instruments in the application of Template EU CCR5-B, separately for derivatives and SFTs. This information should be supplemented by information on collateral posted.

122. Where central banks undertake liquidity assistance in the form of collateral swap transactions, a competent authority may decide that institutions should not disclose Template EU CCR5-B in cases where it deems that the disclosure in that format would allow (now or in the future) for the detection of liquidity assistance provided by central banks via collateral swaps. The waiver by a competent authority should be based on thresholds and objective criteria that are publicly disclosed.

Template 32: EU CCR5-B – Composition of collateral for exposures to CCR

Purpose: Provide a breakdown of all types of collateral (cash, sovereign debt, corporate bonds, etc.) posted or received by banks to support or reduce CCR exposures related to derivative transactions or to SFTs, including transactions cleared through a CCP.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines.
Content: Carrying values of collateral used in derivative transactions or SFTs, whether or not the transactions are cleared through a CCP and whether or not the collateral is posted to a CCP.
Frequency: Semi-annual
Format: Fully flexible
Accompanying narrative: Banks are expected to supplement the template with a narrative commentary to explain any significant changes over the reporting period and the key drivers of such changes.

a	b	c	d	e	f
Collateral used in derivative transactions				Collateral used in SFTs	
Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received	Fair value of posted collateral
Segregated	Unsegregated	Segregated	Unsegregated		

...						
Total						

Definitions

Derivative transactions and SFTs: See the definitions in Template EU CCR5-A.

Segregated: Refers to collateral that is held in a bankruptcy-remote manner in the meaning of Article 300 in the CRR.

Unsegregated: Refers to collateral that is not held in a bankruptcy-remote manner.

123. In the application of Article 439(g) and (h), institutions should disclose information specified in Template EU CCR6.

Template 33: EU CCR6 – Credit derivatives exposures

Purpose: Illustrate the extent of an institution's exposures to credit derivative transactions broken down between derivatives bought or sold.
Scope of application: This template applies to all institutions included in paragraph 7 of these guidelines.
Content: Notional derivative amounts (before any netting) and fair values.
Frequency: Semi-annual
Format: Flexible (the columns are fixed but the rows not in bold are flexible).
Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant changes over the reporting period and the key drivers of such changes.

	a	b	c
	Credit derivative hedges		Other credit derivatives
	Protection bought	Protection sold	
Notionals			
Single-name credit default swaps			
Index credit default swaps			
Total return swaps			
Credit options			
Other credit derivatives			
Total notionals			
Fair values			
Positive fair value (asset)			
Negative fair value (liability)			

4.12 Unencumbered assets

124. The disclosure requirements in Article 443 of the CRR are specified in the EBA Guidelines on the disclosure of encumbered and unencumbered assets (the EBA Guidelines 2014/03).

4.13 Market risk

125. The following sections in these guidelines specify the disclosure requirements to be provided in accordance with Article 445 and Article 455 in the CRR. Information in the sections below relates to instruments in the trading book and instruments in the non-trading book that have their capital requirements and risk-weighted exposure amount for the purposes of Article 92(3)(b) and (c), and Article 92(4)(b) calculated in accordance with Part Three, Title IV of the CRR. Capital requirements and risk-weighted exposure amount for the purposes of Article 92(3)(b)(ii) (large exposures), Article 92(3)(c)(ii) (settlement risk) and Article 92(4)(b)—calculated in accordance with Part Three, Title V, with the exception of Article 379, and Part Four of the CRR—are specified in section 4.6 of these guidelines.

126. Information on instruments whose exposure value is measured in accordance with Part Three, Title II, Chapter 6 (the CCR framework) of the CRR is not included in the following section but is included in section 4.11 of these guidelines.

Section A – Own funds requirements for market risk under the standardised approach

127. Institutions calculating their capital requirements in accordance with Part Three, Title IV, and Chapters 2 to 4 of the CRR (standardised approach) should comply with the requirements of Article 445 in the same regulation by providing the information covered by Template EU MR1.

Template 34: EU MR1 – Market risk under the standardised approach

Purpose: Display the components of own funds requirements under the standardised approach for market risk.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines calculating their capital requirements in accordance with Part Three, Title IV, Chapters 2 to 4 of the CRR. In the case of institutions using internal models in accordance with Chapter 5 in the same title and for which the RWAs under the standardised approach may be deemed not material in accordance with Article 432(1) in the CRR, as specified by the EBA Guidelines 2014/14, the institution—in order to provide only meaningful information to users—may choose not to disclose Template EU MR1. In accordance with that article and paragraph 19 of these guidelines, institutions should clearly state this and should explain why they consider the information not to be meaningful to users. The explanation should include a description of the exposures included in the respective risk portfolios and the aggregate total of RWAs from such exposures.
Content: Capital requirements and RWAs (as specified in Article 92(4)(b) in the CRR).
Frequency: Semi-annual
Format: Fixed
Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant changes in the reporting period and the key drivers of such changes.

		a	b
		RWAs	Capital requirements
	Outright products		
1	Interest rate risk (general and specific)		
2	Equity risk (general and specific)		

3	Foreign exchange risk		
4	Commodity risk		
	Options		
5	Simplified approach		
6	Delta-plus method		
7	Scenario approach		
8	Securitisation (specific risk)		
9	Total		

Definitions

Outright products: Refer to positions in products that are not optional.

Options: Rows 5 to 7 refer to additional requirements for options (non-delta risks).

Section B – Qualitative information on the internal model approach

128. In the application of Article 455 of the CRR, institutions should disclose information specified in Table EU MRB below.

Table 10: EU MRB – Qualitative disclosure requirements for institutions using the IMA

Purpose: Provide the scope, the main characteristics and the key modelling choices of the different models (VaR, SVaR, IRC, comprehensive risk measure) used for regulatory calculation of market risks.
Scope of application: The table is mandatory for all institutions included in paragraph 7 of these guidelines using an internal model to calculate its market risk capital requirements in accordance with Part Three, Title IV, Chapter 5 of the CRR. To provide meaningful information to users on their use of internal models, institutions should describe the main characteristics of the models used at the group level (according to the scope of regulatory consolidation determined as per Part One, Title II of the same regulation) and explain to what extent they represent all the models used at the group level. The commentary should include the percentage of capital requirements covered by the models described for each of the regulatory models (VaR, SVaR, IRC, comprehensive risk measure).
Content: Qualitative information
Frequency: Annually
Format: Flexible

Article 455(a)(i)	(A) Disclosures in accordance with Article 455(a)(i) for institutions using VaR models and SVaR models should cover the following information:	
Article 455	(a)	When describing the scope of use if the IMA under Article 455(a) and (b) is used, institutions should describe activities and risks covered by VaR and SVaR, specifying how they are distributed in portfolios/sub-portfolios for which the competent authority has granted permission.
		As part of the description of the scope of application of the VaR and SVaR models in the application of Article 455(a), institutions should specify which entities in the group use the models for which the competent authority has granted permission or if the same models are used for all entities with market risk exposure.
Article 455(b)	(b)	Specify which entities in the group use the models.
Article 455(a)(i)	(c)	Disclosures to be provided as part of the general description of regulatory VaR and SVaR models (in accordance with Article 455(a)(i)) should include:
Article 455(a)(i)	(d)	Discussion of the main differences, if any, between the model used for management purposes and the model used for regulatory purposes (10 day 99%). For VaR and SVaR models.
Article 455(a)(i)	(e)	For VaR models, institutions must specify:
	(e) (i)	Data updating frequency (Article 455(a)(ii));
	(e) (ii)	Length of the data period that is used to calibrate the model. Describe the weighting scheme that is used (if any);
	(e) (iii)	How the institutions determines the 10-day holding period (for example, does it scale up a 1-day VaR by the square root of 10, or does it directly model the 10-day VaR?);

	(e) (iv)	Aggregation approach, which is the method for aggregating the specific and general risk (i.e. do the institutions calculate the specific charge as a stand-alone charge by using a different method than the one used to calculate the general risk or do the institutions use a single model that diversifies general and specific risk?);
	(e) (v)	Valuation approach (full revaluation or use of approximations);
	(e) (vi)	Whether, when simulating potential movements in risk factors, absolute or relative returns (or a mixed approach) are used (i.e. proportional change in prices or rates or absolute change in prices or rates).
Article 455(a)(i)	(f)	For SVaR models, institutions must specify:
	(f) (i)	How the 10-day holding period is determined. For example, does the institution scale up a 1-day VaR by the square root of 10, or does it directly model the 10-day VaR? If the approach is the same as for the VaR models, the institutions may confirm this and refer to disclosure (e) (iii) above;
	(f) (ii)	The stress period chosen by the institution and the rationale for this choice;
	(f) (iii)	Valuation approach (full revaluation or use of approximations).
Article 455(a)(iii)	(g)	Description of stress testing applied to the modelling parameters (main scenarios developed to capture the characteristics of the portfolios to which the VaR and SVaR models apply at the group level).
Article 455(a)(iv)	(h)	Description of the approach used for backtesting/validating the accuracy and internal consistency of data and parameters used for the internal models and modelling processes.
Article 455(a)(ii)		(B) Disclosures in the application of Article 455(a)(ii) for institutions using internal models to measure the risk for the capital IRC should cover the following information:
		When describing the scope of use if the IMA under Article 455(a) and (b) is used, institutions should describe activities and risks covered by the IRC model, specifying how they are distributed in portfolios/sub-portfolios for which the competent authority has granted permission.
		As part of the description of the scope of application for IRC models in the application of Article 455(a), institutions should specify which entities in the group use the models for which the competent authority has granted permission or if the same models are used for all entities with market risk exposure.
Article 455(a)(ii)	(a)	The general description of the methodology used for internal models for incremental default and migration risk in accordance with Article 455(a)(ii) should include:
	(a) (i)	Information about the overall modelling approach (notably, the use of spread-based models or transition matrix-based models);
	(a) (ii)	Information on the calibration of the transition matrix;
	(a) (iii)	Information about correlation assumptions;
	(a) (iv)	Approach used to determine liquidity horizons;
	(a) (v)	Methodology used to achieve a capital assessment that is consistent with the required soundness standard;
	(a) (vi)	Approach used in the validation of the models.
Article 455(a)(iii)	(b)	Description of stress testing applied to the modelling parameters (main scenarios developed to capture the characteristics of the portfolios to which the IRC models apply at the group level).
Article 455(a)(iv)	(c)	Description of the approach used for backtesting/validating the accuracy and internal consistency of data and parameters used for the IRC internal models and modelling processes.
Article 455(a)(ii)		(C) Disclosures in the application of Article 455(a)(ii) for institutions using internal models to measure the risk for the comprehensive risk capital charge should cover the following information:
		When describing the scope of use if the IMA under Article 455(a) and (b) is used, institutions should describe activities and risks covered by the comprehensive risk measure models, specifying how they are distributed in portfolios/sub-portfolios for which the competent authority has granted permission.
		As part of the description of the scope of application of the comprehensive risk measure models in the application of Article 455(a), institutions should specify which entities in the group use the models and which the competent authority has granted permission or if the same models are used for all entities with market risk exposure.
Article 455(a)(ii)	(a)	The general description of the methodology used for correlation trading in accordance with Article 455(a)(ii) should include:
	(a) (i)	Information about the overall modelling approach (notably, the choice of model correlation between default/migrations and spread: (i) separate but correlated stochastic processes driving migration/default and spread movement; (ii) spread changes driving migration/default; or (iii) default/migrations driving spread changes);
	(a) (ii)	Information used to calibrate the parameters of the base correlation: LGD pricing of the tranches (constant or stochastic);
	(a) (iii)	Information on the choice of whether to age positions (profits and losses based on the simulated market movement in the model calculated based on the time to expiry of each position at the end of the 1-year

		capital horizon or using their time to expiry at the calculation date);
	(b)	Approach used to determine liquidity horizons.
	(c)	Methodology used to achieve a capital assessment that is consistent with the required soundness standard.
	(d)	Approach used in the validation of the models.
Article 455(a)(iii)	(g)	Description of stress testing applied to the modelling parameters (main scenarios developed to capture the characteristics of the portfolios to which the comprehensive risk measure models apply at the group level).
Article 455(a)(iv)	(h)	Description of the approach used for backtesting/validating the accuracy and internal consistency of data and parameters used for the comprehensive risk measure internal models and modelling processes.

Section C – Own funds requirements for market risk under the IMA

129. In the application of Article 455(e) of the CRR, institutions calculating their own funds requirements in accordance with Part Three, Title IV, Chapter 5 of the same regulation (internal market risk models) should disclose information specified in the format of Template EU MR2-A, as well as information listed in Template EU MR2-B below.

Template 35: EU MR2-A – Market risk under the IMA

Purpose: Display the components of the own funds requirements under the IMA for market risk.
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines using an IMA for market risk.
Content: Capital requirements and RWAs (as specified in Article 92(4)(b) of the CRR).
Frequency: Semi-annual
Format: Fixed
Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant changes in the reporting period and the key drivers of such changes.

		a	b
		RWAs	Capital requirements
1	VaR (higher of values a and b)		
(a)	Previous day's VaR (Article 365(1) of the CRR (VaRt-1))		
(b)	Average of the daily VaR (Article 365(1)) of the CRR on each of the preceding 60 business days (VaRavg) x multiplication factor (mc) in accordance with Article 366 of the CRR		
2	SVaR (higher of values a and b)		
(a)	Latest SVaR (Article 365(2) of the CRR (SVaRt-1))		
(b)	Average of the SVaR (Article 365(2) of the CRR) during the preceding 60 business days (SVaRavg) x multiplication factor (ms) (Article 366 of the CRR)		
3	IRC (higher of values a and b)		
(a)	Most recent IRC value (incremental default and migration risks calculated in accordance with Article 370 and Article 371 of the CRR)		
(b)	Average of the IRC number over the preceding 12 weeks		
4	Comprehensive risk measure (higher of values a, b and c)		
(a)	Most recent risk number for the correlation trading portfolio (Article 377 of the CRR)		

(b)	Average of the risk number for the correlation trading portfolio over the preceding 12 weeks		
(c)	8% of the own funds requirement in the standardised approach on the most recent risk number for the correlation trading portfolio (Article 338(4) of the CRR)		
5	Other		
6	Total		

Definitions

Other: Refers to additional capital charges required by supervisors for institutions using the IMA for market risk (e.g. additional capital according to Article 101 of Directive 2013/36/UE).

Template 36: EU MR2-B – RWA flow statements of market risk exposures under the IMA

Purpose: Present a flow statement explaining variations in the market RWAs (as specified in Article 92(4)(b)) determined under an Part Three, Title IV, Chapter 5 of the CRR (IMA).
Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines permitted to use the IMA for the calculation of their market risk capital requirements.
Content: RWAs for market risk. Changes in RWA amounts over the reporting period for each of the key drivers should be based on an institution’s reasonable estimation of the figure.
Frequency: Quarterly
Format: Fixed format for all columns and for rows 1 and 8. Institutions may add additional rows between rows 7 and 8 to disclose additional elements that contribute to RWA variations.
Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant changes over the reporting period and the key drivers of such changes.

		a	b	c	d	e	f	g
		VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total capital requirements
1	RWAs at previous quarter end							
1a	<i>Regulatory adjustment</i>							
1b	<i>RWAs at the previous quarter-end (end of the day)</i>							
2	Movement in risk levels							
3	Model updates/changes							
4	Methodology and policy							
5	Acquisitions and disposals							
6	Foreign exchange movements							
7	Other							
8a	<i>RWAs at the end of the reporting period (end of the day)</i>							
8b	<i>Regulatory adjustment</i>							
8	RWAs at the end of the reporting period							

Definitions

Rows

Movement in risk levels: Changes due to position changes.

Model changes: Significant updates to the model to reflect recent experience (e.g. recalibration), as well as significant changes in model scope. If more than one model update has taken place, additional rows could be necessary.

Methodology and policy: Methodology changes to the calculations driven by regulatory policy changes.

Acquisitions and disposals: Modifications due to acquisition or disposal of business/product lines or entities.

Foreign exchange movements: Changes arising from foreign currency translation movements.

Other: This category must be used to capture changes that cannot be attributed to any other category. Institutions should add additional rows between rows 6 and 7 to disclose other material drivers of RWA movements over the reporting period.

Rows 1a/1b and 8a/8b should be used when the RWA/capital requirement for any of the columns a to d is the 60-day average (for VaR and SVaR) or the 12-week average measure or the floor measure (for IRC and Comprehensive risk measure) and not the RWA/capital requirement at the end of the period (previous or reporting) as defined in template EU MR2-A rows 1a, 2a, 3a, 4a. In these cases, additional rows for regulatory adjustment (as presented above in 1a and 8b) ensure that the institution is able to provide the source of changes in RWA/capital requirement on the basis of the last RWA/capital requirement measure at the end of the period (previous or reporting), disclosed in rows 1b and 8a. In this case, rows 2, 3, 4, 5, 6, 7 reconcile the value in row 1b and 8a.

Columns

RWAs at the end of the reporting period (column VaR): Derived RWAs corresponding to the (capital requirements reflecting the regulatory VaR (10 day 99%), as well as additional capital charge related to the VaR model on the supervisor's decision) x 12.5. This amount should reconcile with the amount shown in template EU MR2-A (row 1/column a).

RWAs at the end of the reporting period (column SVaR): Derived RWAs corresponding to the (capital requirements reflecting the stressed regulatory VaR (10 day 99%), as well as additional capital charge on the supervisor's decision) x 12.5. This amount should reconcile with the amount shown in template EU MR2-A (row 2/column a).

RWAs at the end of the reporting period (column IRC): Derived RWAs corresponding to the (capital requirements as used for computing the IRC, well as additional capital charge on the supervisor's decision (multiplier)) x 12.5. This amount should reconcile with the amount shown in template EU MR42-A (row 3/column a).

RWAs at the end of the reporting period (column Comprehensive risk measure): Derived RWAs corresponding to the (capital requirements as used for computing the comprehensive risk capital charge, as well as any additional capital charge on the supervisor's decision) x 12.5. This amount should reconcile with the amount shown in template EU MR2-A (row 4/column a).

RWAs at the end of the reporting period (column other): Derived RWAs corresponding to specific capital charges (jurisdiction-specific or firm-specific) on the basis of model approaches not reported in VaR/SVaR/IRC/ Comprehensive risk measure. Additional columns can be disclosed where the jurisdictions provide more than one specific capital charge.

Total RWAs at the end of the reporting period: Derived RWAs corresponding to the total capital requirements for market risk (on the basis of IMA x 12.5). This amount must reconcile with the amounts shown in template EU OV1, column 'RWAs', as well as in template EU MR2-A (row total/column a).

Total capital requirements: This amount should reconcile with the amount shown in template EU OV1, column 'minimum capital requirement', as well as in template EU MR2-A (row total/column b).

Section D – Other quantitative information for market risk under the internal models approach

130. In the application of Article 455(d) of the CRR, institutions should disclose information specified in the format of Template EU MR3 below.

Template 37: EU MR3 – IMA values for trading portfolios

<p>Purpose: Display the values (maximum, minimum, average and the ending for the reporting period) resulting from the different types of models approved to be used for computing the regulatory capital charge at the group level, before any additional capital charge is applied on the value in accordance with Article 365 in Part Three, Title V, Chapter 5 of the CRR.</p>
<p>Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines permitted to use an IMA for the calculation of their market risk capital requirements.</p>
<p>Content: Outputs of internal models approved for use in accordance with Part Three, Title IV, Chapter 5 of the CRR for regulatory capital purposes at the group level (according to the scope of regulatory consolidation as per Part One, Title II of the same regulation).</p>
<p>Frequency: Semi-annual</p>
<p>Format: Fixed</p>
<p>Accompanying narrative: Institutions are expected to supplement the template with a narrative commentary to explain any significant changes over the reporting period and the key drivers of such changes.</p>

		a
VaR (10 day 99%)		
1	Maximum value	
2	Average value	
3	Minimum value	
4	Period end	
SVaR (10 day 99%)		
5	Maximum value	
6	Average value	
7	Minimum value	
8	Period end	
IRC (99.9%)		
9	Maximum value	
10	Average value	
11	Minimum value	
12	Period end	
Comprehensive risk capital charge (99.9%)		
13	Maximum value	
14	Average value	
15	Minimum value	
16	Period end	

Definitions

VaR: In this template, this refers to the regulatory VaR used to compute the capital charge, whose characteristics are in accordance with Part Three, Title IV, Chapter 5, Section 2 of the CRR. The amounts reported do not include additional capital charges at the supervisor's discretion (related to the multiplier, for instance).

SVaR: In this template, this refers to the regulatory SVaR used to compute the capital charge, whose characteristics are in accordance with Part Three, Title V, Chapter 5, Section 2 of the CRR. The amounts reported do not include additional capital on the supervisor's decision (multiplier).

IRC: Refers to the IRC as used for computing the capital charge. The amounts reported do not include additional capital on the supervisor's decision (multiplier).

Comprehensive risk capital charge: The rows 13, 14, 15 and 16 are unfloored numbers; the floor calculation is reflected for reporting the end of the period in template EU MR2-A, row 4(c) in column (b).

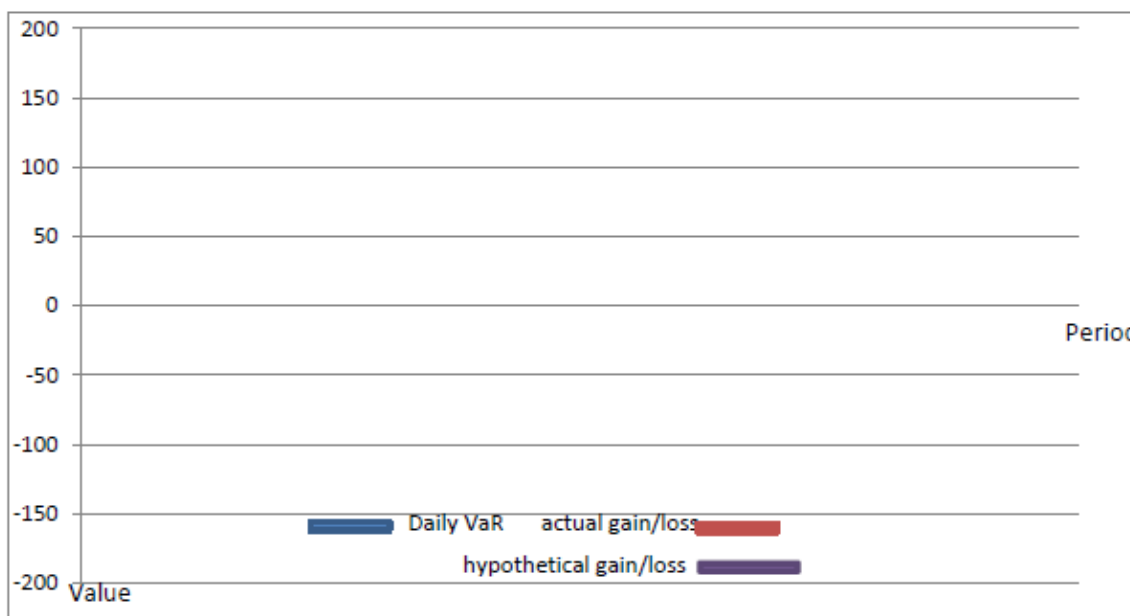
Maximum, average, minimum and end-of-period value reported in this template should be reported in the application of Article 455(d)(i) to (iii) over the reported period and as per the period end. Therefore, these values do not need to reconcile with values reported in EU MR2-A, which are calculated following the regulatory rules as defined in Article 364 of the CRR after any additional capital charges at the supervisor's discretion—for instance, average VaR in template EU MR2-A row 1 (b) should be the average of the daily VaR (99th percentile, one-tailed confidence interval, 10-day holding period) on each of the preceding 60 business days, whereas the expected average value in template EU MR3 is the average value on the reporting period and therefore on the semi-annual period.

131. In the application of Article 455(f), institutions should disclose the weighted average liquidity horizons that have been taken into account in internal models used to compute capital charge for incremental default and migration risks and for correlation trading (as described in information related to requirements in table EU MRB (B) (b) and EU MRB (C) (b)). The data disclosed should enable the monitoring of the liquidity horizon notably in accordance with Article 374(3) to (5) and Article 377(2) of the CRR.

132. In the application of Article 455(g) of the CRR, institutions should disclose information specified in the format of Template EU MR4.

Template 38: EU MR4 – Comparison of VaR estimates with gains/losses

<p>Purpose: Present a comparison of the results of estimates from the regulatory VaR model approved in the application of Part Three, Title IV, Chapter 5 of the CRR with both hypothetical and actual trading outcomes, in order to highlight the frequency and the extent of the backtesting exceptions and to give an analysis of the main outliers in backtested results.</p>
<p>Scope of application: The template applies to all institutions included in paragraph 7 of these guidelines using an IMA for their market risk exposures.</p> <p>To provide meaningful information to users on the backtesting of their internal models, institutions must include (in this template) the key models permitted for use at the group level (according to the scope of regulatory consolidation as per Part One, Title I, Chapter 2 of the same regulation) and explain to what extent they represent the models used at the group level. The commentary should include the percentage of capital requirements covered by the models for which backtesting results are shown in Template EU MR4.</p>
<p>Content: VaR model outcomes</p>
<p>Frequency: Semi-annual</p>
<p>Format: Flexible</p>
<p>Accompanying narrative: Institutions must present an analysis of ‘outliers’ (backtesting exceptions as per Article 366 of Regulation (EU) No 575/2013) in backtested results, specifying the dates and the corresponding excess (VaR-P&L). The analysis should at least specify the key drivers of the exceptions.</p> <p>Institutions should disclose similar comparisons for actual P&L and hypothetical P&L (as per Article 366 of Regulation (EU) No 575/2013).</p> <p>Institutions must provide information about actual gains/losses, and especially to clarify whether they include reserves and, if not, how reserves are integrated into the backtesting process.</p>



Daily VaR: In this template, it should reflect the risk measures (used for regulatory purposes and whose characteristics are in accordance with Part Three, Title IV, Chapter 5, Section 2 of the CRR) calibrated to a 1-day holding period to compare with the 99% confidence level with its trading outcomes.

Hypothetical gain/loss: This is based on hypothetical changes in portfolio values that would occur if end-of-day positions remain unchanged.

4.14 Remuneration

133. The disclosure requirements in Article 450 of the CRR are specified in the EBA Guidelines on sound remuneration policies under Articles 74(3) and 75(2) of Directive 2013/36/EU and disclosures under Article 450 of Regulation (EU) No 575/2013 (the EBA Guidelines 2015/22).

4.15 Leverage ratio

134. The disclosure requirements in Article 451 of the CRR are specified in the Commission Implementing Regulation (EU) No 2016/200 of 15 February 2016.

4.16 Dissemination of information

135. In addition to the stand-alone document referred to in section 4.2, Section D of these guidelines, an institution may make available on their website and in an editable format the quantitative disclosures provided in accordance with articles from Part Eight of the CRR for which guidance is provided in these guidelines.

Annex 1 – Overview of the guidelines

Annex I separately provides an overview of the guidelines by showing, for each table, template or textual guidance item in these guidelines:

- The scope of application.
- The frequency of disclosure (quarterly, semi-annual, annual)

TABLE/TEMPLATE	SCOPE OF APPLICATION	FREQUENCY OF DISCLOSURE
Table 1- EU OVA: Institution risk management approach	The template is mandatory for all institutions included in par. 7 of these Guidelines.	Annual
Table 2- EU CRA: General qualitative information about credit risk	The template is mandatory for all institutions included in par. 7 of these Guidelines	Annual
Table 3- EU CCRA: Qualitative disclosure requirements related to counterparty credit risk	The table is mandatory for all institutions included in par. 7 of these Guidelines	Annual
Table 4- EU MRA: Qualitative disclosure requirements related to market risk	The table is mandatory for all institutions included in par. 7 of these Guidelines that are subject to a market risk capital requirement for their trading activities	Annual
Table 5- EU LIA: Explanations of differences between accounting and regulatory exposure amounts	The table applies to all institutions included in par. 7 of these Guidelines	Annual
Table 6 - EU CRB-A: Additional disclosure related to the credit quality of assets	The table applies to all institutions included in par. 7 of these Guidelines	Annual
Table 7- EU CRC: Qualitative disclosure requirements related to credit risk mitigation techniques	The template is mandatory for all Institutions included in par. 7 of these Guidelines	Annual
Table 8- EU CRD: Qualitative disclosure requirements on institutions' use of external credit ratings under the Standardised Approach for credit risk	The table applies to all institutions included in par. 7 of these Guidelines that calculate the risk-weighted exposure amounts in accordance with Part Three, Title II, Chapter 2 of Regulation (EU) 575/2013. In order to provide meaningful information to users, an institution may choose not to disclose the information requested in the table if the exposures and risk-weighted exposure amounts determined under calculating the risk-weighted exposure amounts in accordance with Part Three, Title II, Chapter 2 of Regulation (EU) 575/2013 are not material in accordance with Article 432(1) of the same Regulation, as specified in EBA GL/2014/14. In accordance with that Article and paragraph 19 of these Guidelines, the institution should clearly state that fact. In addition it should explain why it considers the information not to be meaningful to users and not material, including a description of the exposure classes concerned and the aggregate total risk exposure these exposure classes represent.	Annual
Table 9- EU CRE: Qualitative disclosure requirements related to IRB models	The table applies to institutions included in par. 7 of these Guidelines permitted to use Advanced Internal Rating Based (AIRB) or Foundation Internal Rating Based (FIRB) approaches for some or all of their exposures in accordance with Part Three, Title II, Chapter 3 of Regulation (EU) 575/2013. To provide meaningful information to users, institutions should describe the main characteristics of the models used at the group-wide level (according to the scope of regulatory consolidation as per Part One, Title II of the same Regulation) and explain how the scope of models described was determined. The commentary should include the percentage of RWAs covered by the models for each of the institution's regulatory portfolios.	Annual

TABLE/TEMPLATE	SCOPE OF APPLICATION	FREQUENCY OF DISCLOSURE
Table 10- EU MRB: Qualitative disclosure requirements for institutions using the Internal Models Approach (IMA)	<p>The table is mandatory for all institutions included in par. 7 of these Guidelines using an internal model to calculate its market risk capital requirements in accordance with Part Three, Title IV, Chapter 5 of Regulation (EU) 575/2013.</p> <p>To provide meaningful information to users on their use of internal models, institutions should describe the main characteristics of the models used at the group-wide level (according to the scope of regulatory consolidation determined as per Part One, Title II of the same Regulation) and explain to what extent they represent all the models used at the group-wide level. The commentary should include the percentage of capital requirements covered by the models described for each of the regulatory models (VaR, stressed VaR, IRC, Comprehensive Risk Measure -CRM).</p>	Annual
Template 1- EU LI1: Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories	The template applies to all institutions included in par. 7 of these Guidelines. For institutions that are not required to publish consolidated financial statements, only columns (b) to (g) should be disclosed	Annual
Template 2- EU LI2: Main sources of differences between regulatory exposure amounts and carrying values in financial statements	The template applies to all institutions included in par. 7 of these Guidelines	Annual
Template 3- EU LI3: Outline of the differences in the scopes of consolidation – entity by entity	The template applies to all institutions included in par. 7 of these Guidelines	Annual
Template 4- EU OV1: Overview of RWA	The template applies to all institutions included in par. 7 of these Guidelines	Quarterly
Template 5- EU CR10: IRB (specialised lending and equities)	The template applies to all institutions included in par. 7 of these Guidelines using one of the approaches included in the template in accordance with Article 153(5) or Article 155(2) of Regulation (EU) 575/2013	Semi-annual
Template 6- EU INS1: Non-deducted participations in insurance undertakings	<p>The template applies to all institutions included in par. 7 of these Guidelines which are required or permitted by their competent authorities to apply method 1, 2 or 3 of Annex I to Directive 2002/87/EC and permitted in accordance with Article 49(1) of Regulation (EU) 575/2013 not to deduct their holding of own funds instruments of an insurance undertaking, a re-insurance undertaking or an insurance holding company for the purpose of calculating their capital requirements on an individual, sub-consolidated and consolidated basis.</p>	Semi-annual
Template 7- EU CRB-B: Total and average net amount of exposures	The template applies to all institutions included in par. 7 of these Guidelines.	Annual
Template 8- EU CRB-C: Geographical breakdown of exposures	The template applies to all institutions included in par. 7 of these Guidelines.	Annual

TABLE/TEMPLATE	SCOPE OF APPLICATION	FREQUENCY OF DISCLOSURE
Template 9- EU CRB-D: Concentration of exposures by industry or counterparty types	The template applies to all institutions included in par. 7 of these Guidelines	Annual
Template 10- EU CRB-E: Maturity of exposures	The template applies to all institutions included in par. 7 of these Guidelines.	Annual
Template 11- EU CR1-A: Credit quality of exposures by exposure classes and instruments	The template applies to all institutions included in par. 7 of these Guidelines	Semi-annual
Template 12- EU CR1-B: Credit quality of exposures by industry or counterparty types	The template applies to all institutions included in par. 7 of these Guidelines	Semi-annual
Template 13- EU CR1-C: Credit quality of exposures by geography	The template applies to all institutions included in par. 7 of these Guidelines	Semi-annual
Template 14- EU CR1-D: Ageing of past-due exposures	The template applies to all institutions included in par. 7 of these Guidelines	Semi-annual
Template 15- EU CR1-E: Non-performing and forborne exposures	The template applies to all institutions included in par. 7 of these Guidelines.	Semi-annual
Template 16- EU CR2-A: Changes in stock of general and specific credit risk adjustments	The template applies to all institutions included in par. 7 of these Guidelines	Semi-annual
Template 17- EU CR2-B: Changes in stock of defaulted and impaired loans and debt securities	The template applies to all institutions included in par. 7 of these Guidelines	Semi-annual
Template 18- EU CR3: Credit risk mitigation techniques – overview	The template applies to all Institutions included in par. 7 of these Guidelines.	Semi-annual
Template 19- EU CR4: Standardised approach – credit risk exposure and Credit Risk Mitigation (CRM) effects	<p>The template applies to all institutions included in par. 7 of these Guidelines calculating the risk-weighted exposure amounts in accordance with Part Three, Title II, Chapter 2 of Regulation (EU) 575/2013. Template EU CR4 does not cover derivative instruments, repurchase transactions, securities or commodities lending or borrowing transactions, long settlement transactions and margin lending transactions subject to Part Three, Title II, Chapter 6 of Regulation (EU) 575/2013 or subject to Article 92 (3) point (f) of the same Regulation, whose regulatory exposure value is calculated according to the methods laid down in the aforementioned Chapter.</p> <p>An institution may risk-weight exposures under Chapter 3 of the same Regulation and the exposures and RWA amounts calculated in accordance with Chapter 2 is not material in accordance with Article 432(1) of the same Regulation, as specified in EBA GL/2014/14. In such circumstances, and to provide only meaningful information to users, an institution may choose not to disclose Template EU CR4. In accordance with that Article and paragraph 19 of these Guidelines, the institution should clearly state that fact. In addition it should explain why it considers the information in Template EU CR4 not to be meaningful to users. The explanation should include a description of the exposures included in the respective exposure classes and the aggregate total of RWAs from such exposure classes.</p>	Semi-annual

TABLE/TEMPLATE	SCOPE OF APPLICATION	FREQUENCY OF DISCLOSURE
Template 20- EU CR5: Standardised approach	<p>The template applies to all institutions included in par. 7 of these Guidelines calculating the risk-weighted exposure amounts in accordance with Part Three, Title II, Chapter 2 of Regulation (EU) 575/2013. An institution risk-weights exposures under Chapter 3 of the same Regulation and the exposures and RWA amounts calculated in accordance with Chapter 2 is not material in accordance with Article 432(1) of the same Regulation, as specified in EBA GL/2014/14. In such circumstances, and to provide only meaningful information to users, an institution may choose not to disclose Template EU CR4. In accordance with that Article and paragraph 19 of these Guidelines, the institution should clearly state that fact. In addition it should explain why it considers the information in Template EU CR4 not to be meaningful to users. The explanation should include a description of the exposures included in the respective exposure classes and the aggregate total of RWAs from such exposure classes.</p>	Semi-annual
Template 21- EU CR6: IRB – Credit risk exposures by exposure class and PD range	<p>The template applies to institutions included in par. 7 of these Guidelines using either the FIRB or the AIRB approach for some or all of their exposures in accordance with Part Three, Title II, Chapter 3 of Regulation (EU) 575/2013. Where an institution makes use of both FIRB and AIRB approaches, it should disclose one template for each approach used.</p>	Semi-annual
Template 22- EU CR7: IRB – Effect on RWA of credit derivatives used as CRM techniques	<p>The template applies to all institutions included in par. 7 of these Guidelines using the AIRB and/or FIRB approaches for some or all of their exposure</p>	Semi-annual
Template 23- EU CR8: RWA flow statements of credit risk exposures under IRB	<p>The template applies to all institutions included in par. 7 of these Guidelines using the AIRB and/or FIRB approaches.</p>	Quarterly
Template 24- EU CR9: IRB – Backtesting of probability of default (PD) per exposure class	<p>The template applies to all institutions included in par. 7 of these Guidelines using the AIRB and/or FIRB approaches. Where an institution makes use of a FIRB approach for certain exposures and an AIRB approach for others, it must disclose two separate sets of portfolio breakdown in separate templates. To provide meaningful information to users on the backtesting of their internal models through this template, the institution must include in this template the key models used at the group-wide level (according to the scope of regulatory consolidation) and explain how the scope of models described was determined. The commentary must include the percentage of RWAs covered by the models for which backtesting results are shown here for each of the institution’s regulatory portfolios.</p>	Annual
Template 25- EU CCR1: Analysis of the counterparty credit risk (CCR) exposure by approach	<p>The template applies to all institutions included in par. 7 of these Guidelines with instruments for which the exposure value is calculated in accordance with Part Three, Title II, Chapter 6 of Regulation (EU) 575/2013.</p>	Semi-annual
Template 26- EU CCR2: Credit valuation adjustment (CVA) capital charge	<p>The template applies to all institutions included in par. 7 of these Guidelines with exposures subject to CVA capital charges in accordance with Part Three, Title VI, Article 382 in Regulation (EU) 575/2013.</p>	Semiannual
Template 27- EU CCR8: Exposures to central counterparties	<p>The template applies to all institutions included in par. 7 of these Guidelines</p>	Semiannual

TABLE/TEMPLATE	SCOPE OF APPLICATION	FREQUENCY OF DISCLOSURE
Template 28- EU CCR3: Standardised approach – CCR exposures by regulatory portfolio and risk.	<p>The template is mandatory for all institutions included in par. 7 of these Guidelines using the credit risk standardised approach to compute RWA for counterparty credit risk exposures in accordance with Article 107 in Regulation (EU) 575/2013, irrespective of approach used to determine exposure at default in accordance with Part Three, Title II, Chapter 6 of the same Regulation.</p> <p>In order to provide meaningful information to users, an institution may choose not to disclose the information requested in the table if the exposures and risk-weighted exposure amounts determined in accordance with Part Three, Title II, Chapter 2 of Regulation (EU) 575/2013 are not material in accordance with Article 432(1) of the same Regulation, as specified in EBA GL/2014/14. In accordance with that Article and paragraph 19 of these Guidelines, the institution should clearly state that fact. In addition it should explain why it considers the information not to be meaningful to users and not material, including a description of the exposure classes concerned and the aggregate total risk exposure these exposure class represent.</p>	Semi-annual
Template 29- EU CCR4: IRB – CCR exposures by portfolio and PD scale	<p>The template is mandatory for all institutions included in par. 7 of these Guidelines using an AIRB or FIRB approach to compute RWA for counterparty credit risk exposures in accordance with Article 107 in Regulation (EU) 575/2013, whatever counterparty credit risk approach is used to determine exposure at default in accordance with Part Three, Title II; Chapter 6 of that Regulation. Where an institution makes use of an FIRB approach for certain exposures and an AIRB approach for others, it must disclose two separate sets of portfolio breakdown in two separate templates.</p> <p>To provide meaningful information, the institution should include in this template the key models used at the group-wide level (according to the scope of regulatory consolidation) and explain how the scope of models described in this template was determined. The commentary should include the percentage of RWAs covered by the models shown here for each of the institution's regulatory portfolios.</p>	Semi-annual
Template 30- EU CCR7: RWA flow statements of CCR exposures under Internal Model Method (IMM)	<p>The template is mandatory for all institutions included in par. 7 of these Guidelines using the Internal Model Method for measuring exposure at default of exposures subject to the counterparty credit risk framework in accordance with Part Three, Title II; Chapter 6 of Regulation (EU) 575/2013, irrespective of the credit risk approach used to compute RWA from exposures at default.</p>	Quarterly
Template 31- EU CCR5-A: Impact of netting and collateral held on exposure values	The template applies to all institutions included in par. 7 of these Guidelines	Semi-annual

TABLE/TEMPLATE	SCOPE OF APPLICATION	FREQUENCY OF DISCLOSURE
Template 32- EU CCR5-B: Composition of collateral for exposures to counterparty credit risk	The template applies to all institutions included in par. 7 of these Guidelines.	Semi-annual
Template 33- EU CCR6: Credit derivatives exposures	This template applies to all institutions included in par. 7 of these Guidelines.	Semi-annual
Template 34- EU MR1: Market risk under standardised approach	<p>The template applies to all institutions included in par. 7 of these Guidelines calculating their capital requirements in accordance with Part Three, Title IV, Chapters 2 to 4 of Regulation (EU) 575/2013. For institutions using internal models in accordance with Chapter 5 in the same Title and for which the Risk Weighted amounts (RWA) under the standardised approach may be deemed not material in accordance with Article 432(1) in Regulation (EU) 575/2013 as specified by EBA GL/2014/14. In such circumstances, and to provide only meaningful information to users, institutions may choose not to disclose Template EU-MR1. In accordance with that Article and paragraph 19 of these Guidelines, institutions should clearly state that fact and should explain why they consider the information not to be meaningful to users. The explanation should include a description of the exposures included in the respective risk portfolios and the aggregate total of RWAs from such exposures.</p>	Semi-annual
Template 35- EU MR2-A: Market risk under internal models approach	The template applies to all institutions included in par. 7 of these Guidelines using an internal model approach for market risk.	Semi-annual
Template 36- EU MR2-B: RWA flow statements of market risk exposures under an IMA	The template applies to all institutions included in par. 7 of these Guidelines permitted to use an internal model approach for the calculation of their market risk capital requirements	Quarterly
Template 37- EU MR3: IMA values for trading portfolios	The template applies to all institutions included in par. 7 of these Guidelines permitted to use an internal model approach for the calculation of their market risk capital requirements	Semi-annual
Template 38- EU MR4: Comparison of VaR estimates with gains/losses	<p>The template applies to all institutions included in par. 7 of these Guidelines using an internal model approach for their market risk exposures.</p> <p>To provide meaningful information to users on the backtesting of their internal models, institutions must include in this template the key models permitted for use at the group-wide level (according to the scope of regulatory consolidation as per Part One, Title I, Chapter 2 of the same Regulation) and explain to what extent they represent the models used at the group-wide level. The commentary should include the percentage of capital requirements covered by the models for which backtesting results are shown in Template EU MR4.</p>	Semi-annual

Accompanying documents

Draft cost-benefit analysis/impact assessment

The BCBS revised the Pillar 3 disclosure framework in a document published in January 2015. The new Pillar 3 disclosure requirements are expected to be in force in December 2016.

The current EBA initiative stems from these new requirements introduced at the BCBS level and the intention to implement them in line with EU-specific disclosure requirements included in Part Eight of the CRR.

In this vein, the EBA issued guidelines to complement the current disclosure framework under Part Eight of the CRR while implementing the new Pillar 3 requirements.

As per Article 16(2) of the EBA regulation (Regulation (EU) No 1093/2010 of the European Parliament and of the Council), any guidelines developed by the EBA shall be accompanied by an impact assessment annex that analyses ‘the potential related costs and benefits’. Such an annex shall provide the reader with an overview of the findings with regard to the problems identified, the options found to remove the problem and their potential impacts.

This annex presents the impact assessment with a cost-benefit analysis of the provisions included in the guidelines. Given the nature of the study, the impact analysis is high-level and mostly qualitative in nature.

A. Problem identification

The major problem that the guidelines aim to address is potential asymmetric information between information on institutions available to market participants and information internally available to institutions. In the current regulatory framework, market participants have access to limited information. The problem of asymmetric information is true particularly in the fields of solvency, risks and institutions’ risk exposures, especially when the institutions use internal models.

Secondly, when the information is available, the framework allows only a limited level of comparability across institutions due to the lack of common disclosure formats for most of the disclosure requirements. As a result, institutions—both within a jurisdiction and on a cross-border basis—use various disclosure practices and definitions of key concepts.

Overall, asymmetric information and a lack of comparability of information by market participants impair the functioning of market discipline.

Furthermore, the BCBS issued an RPF in January 2015, which is expected to be in force in December 2016. The RPF particularly intends to address the issues posed by the lack of comparability of information and its detrimental impact on market discipline, especially in the field of internal models used to calculate RWAs and capital requirements. The BCBS also intends to restore the confidence of markets regarding internal modelled RWAs through increased transparency and comparability of information.

The disclosure requirements in the EU have not yet been updated to incorporate the RPF, which may lead to further problems for EU institutions.

As the RPF is not legally binding in the EU, EU institutions still have to apply the disclosure requirements from the EU regulatory framework, whose previous assessments by the EBA identified issues relating to their consistent implementation. In parallel, however, market pressure may result in some of the EU institutions being compelled to adopt the RPF. This would possibly lead to duplicative disclosures when the two sets of requirements overlap without necessarily fully matching. As a result, double reporting would increase the regulatory burden for EU institutions.

In addition, the RPF is based on the Basel Pillar 1 framework while the CRR disclosure requirements follow the EU implementation of the Basel requirements. Institutions that would wish to implement the tables and templates from the RPF as a medium to comply with the existing CRR disclosure requirements would face the need to adjust the content of the RPF to fit these CRR requirements. Should they not be provided with guidance on how to proceed, institutions may end up operating different adjustments to the RPF to fit it into a CRR context, leading to fragmentation of the use of the harmonised formats agreed on at the international level, depending on the industry policy in each jurisdiction or depending on each institution's decision.

B. Policy objectives

The specific objectives of the guidelines are to increase consistency and comparability of information in the EU disclosure framework and to address any potential misalignments between the RPF and the current CRR requirements. Precisely, they aim to enhance the practices of institutions with regard to their implementation of the disclosure requirements in Part Eight of the CRR, by particularly allowing the introduction (in the EU) of those elements of the RPF that are suited to a harmonised implementation of the CRR disclosure requirements.

Operationally, the guidelines aim to specify the current EU disclosure framework so that it addresses the problem of asymmetric information, increases comparability and removes potential conflicting and non-harmonised practices between EU disclosure requirements and the international framework. The ultimate general objective is to strengthen market discipline. The table below summarises the objectives of the guidelines.

Figure 3: Impact assessment – Objectives of the guidelines

Problems	Operational objectives	Specific objectives	General objectives
Asymmetric information and lack of comparability	Specifying the current EU framework in line with international requirements	Improving information consistency and comparability	Strengthening market discipline in the EU banking sector
Misalignment between the EU framework and international requirements		Addressing conflicting/redundant requirements between the CRR disclosure requirements and Basel Pillar 3 requirements	Harmonisation in the format used for the CRR disclosure requirements
Market pressure towards compliance with the revised Basel Pillar 3 framework		Decreasing the possible regulatory burden that may arise due to imperfect interaction between the EU and Basel disclosure requirements	

C. Baseline scenario

If no further action is taken, institutions in the EU required to provide disclosures in Part Eight of the CRR in accordance with Article 6 and Article 13 of that regulation may face issues of market pressure that could lead to a burdensome double disclosure practice. Users of information may adversely be impacted by unharmonised information—despite the common templates agreed upon at the international level—if institutions are left to operate by themselves the adjustments needed to the RPF to use its tables and templates in an EU context.

D. Assessment of the options and the preferred option(s)

This section discusses the major options that have been discussed during the drafting of the current guidelines. Where possible, the text presents the advantages and disadvantages of the options and their corresponding qualitative cost evaluation.

a. The EBA own-initiated guidelines vs no action

The EBA considered taking regulatory intervention in the form of guidelines to respond to the revision of the Pillar 3 disclosure requirements under the BCBS and to accommodate them within the CRR framework.

Under the option of ‘no action’, the problems described above are expected to remain until the EU implements the RPF as a modification of the CRR, which will not take place in time for the first implementation date of the RPF (December 2016).

Under the ‘no action’ option, institutions may face uncertainty regarding the most appropriate way to comply with the regulatory requirements on disclosure. On the one hand, there are the RPF requirements under the BCBS and, on the other hand, there are the EU requirements under Part Eight of the CRR. These two frameworks do not fully overlap; therefore, ‘no action’ may create uncertainty for institutions in relation to the applicable regulatory framework on disclosures and heterogeneous adjustments to accommodate the new requirements. On the other hand, further guidelines that specify rules under the CRR and clarify the synergy with the BCBS RPF are expected to establish certainty with regard to compliance with the CRR disclosure requirements at a time where markets expect new formats for disclosures to be used. Institutions would be provided with certainty with regard to their compliance with both the CRR and the RPF.

From the perspective of market participants, harmonised presentation facilitates the use of information and is most useful. They have cost-effective access to information and the cost of processing the received information is lower. On the other hand, barriers to access are higher under fragmented disclosure requirements and so are the cost of access to information and the costs of information processing for market participants. Therefore, an intervention in the form of further guidelines is expected to improve the status quo.

As a result, ‘no action’ is first expected to create larger regulatory cost for institutions due to uncertainty. Secondly, it does not address the fundamental problems that market participants may face (as discussed above), hence placing a higher cost on them.

The expected cost of compliance for the institutions is a one-off, since they need to make operational adjustments to report required information. The benefits of the option are expected to exceed these costs.

b. Adopting the Basel framework vs adopting the Basel framework including alignment with the CRR

A major trigger for the regulatory intervention (i.e. current draft guidelines) is the recent developments at the international level—namely, the RPF disclosure requirements under the BCBS. As a result, the EBA considered (i) adopting of the RPF as it is and (ii) revising the framework in line with the CRR before adopting it.

The preferred option is the revision of the framework in line with the CRR before adopting it. It is clear that the current CRR disclosure requirements are not identical to the revised BCBS Pillar 3 disclosure requirements.

The EBA argues that an adjustment of the content of the RPF is, in any case, needed to implement it in the EU context, as EBA own-initiative guidelines specify existing CRR disclosure requirements.

Such adjustments are more cost-effective for institutions, as they avoid any conflict between the two frameworks when they are not identical.

In case no adjustments were implemented, institutions would adopt BCBS requirements that, in certain aspects, do not coincide with the CRR-specific disclosure requirements and, as a result, from a pure compliance aspect, would end up providing two sets of disclosure. This is expected to create further costs for institutions.

The one-off cost of implementing the disclosure framework is equal under both options; however, adopting the RPF as it is would create a further cost of compliance in the future.

c. Scope of the guidelines – No limitation in the scope of application (all institutions) vs limiting the scope of application (G-SIIs and O-SIIs)

The disclosure requirements in the CRR currently apply to all institutions as defined in Article 4(2) of the CRR, with specific modalities depending on whether these institutions are stand-alone institutions, parent institutions or included in a group of institutions.

Proportionality of the application of the disclosure requirements is ensured via the rationale that the smaller institutions are (expected to be) less risky and therefore are subject to less disclosure requirements—e.g. the specific disclosure requirements on the use of internal models (as specified in Article 452 and Article 455 of the CRR) may not be applicable to these institutions. In addition, the principle of materiality as coined in Article 432(1) of the CRR and specified in the EBA Guidelines 2014/14 ensures that the level of disclosure by institutions corresponds to the risks that arise from the activities in which they are involved (with institutions allowed not to disclose immaterial information).

The introduction of harmonised disclosure templates can be disproportionately costlier for some institutions, as institutions may have to integrate all the templates in their information systems to be able to produce the data upon request if they became exposed to the risks dealt with by the templates or if this exposure became material. Because of this, the EBA considered restricting the application of the guidelines to a subset of EU institutions. The options considered were:

- **No limitation in the scope of application of the guidelines (all institutions)** – The disclosure requirements in the CRR apply to all institutions, and so should the specifications of these requirements;
- **Limiting the scope of application of the guidelines (G-SIIs and O-SIIs)** – Comparability of disclosures especially matters for those institutions that have an important domestic or international influence and that are benchmarked by markets with their competitor peers. Disclosures and transparency are still necessary for the smaller, domestic institutions, but this could be provided under a free format, in compliance with the current CRR disclosure requirements. Whenever they choose to do so, all institutions other than G-SIIs and O-SIIs could also implement—on their own initiative—part or all of the guidance in the current guidelines.

Figure 4: Impact assessment – Number and size of the institutions below presents the scope of the options in terms of number and size of the institutions. Limiting the scope of application of the guidelines to G-SIIs and O-SIIs allows covering 68% of the EU banking assets, assuming all these institutions are subject to the CRR disclosure requirements.

Figure 4: Impact assessment – Number and size of the institutions

	Number of institutions	Total assets for [B]	Number of G-SIIs/O-SIIs	Total assets for [D]	Asset share of G-SIIs/O-SIIs
[A]	[B]	[C]	[D]	[E]	[F] = [E] / [C]
AT	790	927 155	5	622 550	67%
BE	104	1 044 123	5	720 209	69%
BG	30	43 752	0	0	0%
CY	93	78 836	3	44 133	56%
CZ	44	187 511	3	106 586	57%
DE	1 705	7 808 463	12	3 823 462	49%
DK	96	992 212	4	681 558	69%
EE	15	19 790	2	14 490	73%
ES	286	2 760 637	2	2 061 882	75%
FI	306	534 742	3	439 431	82%
FR	386	7 971 091	6	6 362 728	80%
GB	201	7 976 923	7	7 114 841	89%
GR	40	406 690	4	337 458	83%
HR	35	53 083	3	35 982	68%
HU	169	99 912	3	48 619	49%
IE	32	928 157	2	219 554	24%
IT	684	3 650 047	3	1 607 891	44%
LT	16	22 530	3	17 443	77%
LU	147	713 378	4	243 637	34%
LV	28	29 160	3	13 917	48%
MT	27	49 691	3	18 156	37%
NL	118	2 432 945	5	2 112 073	87%
NO	212	745 159	2	311 972	42%
PL	640	339 153	0	0	0%
PT	183	467 071	5	285 287	61%
RO	36	84 546	11	71 231	84%
SE	105	1 611 585	4	1 303 797	81%
SI	20	39 455	3	18 682	47%

SK	28	59 222	1	11 215	19%
Total	6 574	42 077 118	103	28 648 782	68%

Notes and sources

Country-level aggregate figures, [B] and [C]: The EBA aggregate statistics

Data on reporting institutions, [E]: FINREP

Identification of G-SIIs/O-SIIs: The EBA website

Monetary values are expressed in EUR millions.

Feedback from the public consultation

The EBA publicly consulted on the draft proposal contained in this paper.

The consultation period lasted for 3 months and ended on 29 September 2016. Fourteen responses were received.

This section presents a summary of the key points and other comments arising from the consultation, the analysis and discussion triggered by these comments and the actions taken to address them if deemed necessary.

In many cases, several industry bodies made similar comments or the same body repeated its comments in the response to different questions. In such cases, the comments (and the EBA’s analysis) are included in the section of this paper where the EBA considers them most appropriate.

Changes to the draft guidelines have been incorporated as a result of the responses received during the public consultation.

Summary of the key issues and the EBA’s response

The consultation period of the guidelines ran until 29 September 2016. During this period, many feedback comments were received from banks and banking associations on the questions raised by the EBA in the consultation paper and on the different topics covered by the guidelines.

Some of the most common feedback received referred to the need to alleviate the complexity and granularity of the disclosure templates included in the guidelines and the need for alignment with the RPF. In order to address these comments, the EBA has streamlined the templates as much as possible and dropped some of the templates included in the consultation paper.

Some questions were raised regarding the introduction of comparative figures for the first implementation of the guidelines. To address these questions, the guidelines now indicate that previous period data is not required when data is reported for the first time, and clarify that the term ‘previous period data’ is the period of the last data disclosed according to the frequency of each template.

Section 4.4 of the guidelines covers the linkages between financial statements and regulatory exposures, highlighting the differences in the scope of consolidation (templates LI1 and LI3) and

the measurement of exposures (template LI2). Table LIA gives additional information on these two issues. Comments received on templates LI1 and LI2 basically requested removing some specific requirements; the EBA decided to remove only those requirements that were part of the supplementary guidance and could be understood as going beyond the RPF. Regarding Template LI3 (not in the RPF), it includes information for each entity within the accounting scope of consolidation on the method used in the accounting consolidation and the one used in the regulatory consolidation. Many comments received complained about the significant burden that this disclosure 'entity by entity' would imply for larger groups and the limited benefits for investors and stakeholders. Following these comments, the EBA is now requesting this information only for those entities where the method of accounting consolidation differs from the method of regulatory consolidation.

Some feedback was also received regarding the scope of application and particularly the application of requirements under Article 435(2) of the CRR to significant subsidiaries. According to these comments, Article 13 does not include any reference to Article 435 and, therefore, requesting significant subsidiaries to disclose information under the latter article would be out of the scope of Article 13. The text of the guidelines has been changed accordingly, excluding significant subsidiaries from the scope of application of information requested under Article 435(2).

Feedback received on template EU OVA raised concerns about the necessity to disclose qualitative information on intragroup transactions. These concerns have been addressed by limiting the disclosure to transactions with material impact.

Although many comments were received regarding the early application statement that encourages the early implementation of part of the templates in the guidelines as of end December 2016 for some institutions, the EBA is going ahead with this early implementation on the following basis: all the templates that are included in the early application statement are based on regulatory calculations, on supervisory reporting data that EU institutions are used to reporting on a quarterly basis. Furthermore, these templates do not deviate at all from the RPF published in January 2015 and therefore institutions are familiarised since then with this information.

To enhance users' access to information, the draft guidelines included the possibility of presenting quantitative disclosures in an editable format. Most of the respondents did not support this option, highlighting that it could overburden the institutions with additional cost, resources, complexity and revalidation. Following this feedback, the wording in the guidelines has been changed: 'institutions may (instead of should) make available on their website and in an editable format the quantitative templates provided in the guidelines'. This way, while institutions will decide if they are willing to provide this service to users, the guidelines encourage the use of this best practice.

Concerning the qualitative disclosure requirements related to CCR, all references to CCP exposures have been dropped, following comments received that this requirement was beyond the CRR.

Question 1 in the consultation paper asked users if they prefer a comprehensive template providing a breakdown of capital requirements and RWAs by exposure classes for credit risk in Template EU OV1-B, or to have the detailed breakdown by exposure classes provided in Template EU CR5-B for the standardised approach and Template EU CR6 for the IRB approach. Following answers by respondents, it was decided that template EU OV1-A provides an appropriate level of disclosure and template EU OV1-B was dropped, as similar information can be found in Templates EU OV1-A and EU CR5 and EU CR6.

Feedback was received from several respondents regarding the inclusion in the guidelines of the disclosure template EU INS1 on 'non-deducted participations in insurance undertakings'. Respondents argued that the inclusion of this template is inadequate and that it should be dropped from the guidelines. The EBA is of the view that the disclosure of this information is meaningful for market participants and helps promote comparability among banks when options and discretions under the EU CRR framework are exercised. The disclosure of the information included in template EU INS1 does not undermine the effectiveness of Article 49, as banks' capital ratios are not affected and remain unchanged. From a legal point of view, the inclusion of the template is supported by Article 438(c) and (d) of the CRR, by which institutions are requested to provide this data as part of the information on the risk-weighted exposure amounts.

In general, regarding templates on credit risk, for those templates including a breakdown of exposures classes and following the feedback received, this breakdown has been fully aligned with COREP. Only the material exposure classes need to be included. Templates EU CR1-A, EU CR1-B and EU CR1-C were streamlined after the consultation process. Template EU CR2-A was also adjusted by dropping rows 12 (direct partial or total write-offs) and 13 (recoveries of direct partial or total write-offs) of the version included in the consultation paper. Template EU CR3 on an overview of CRM techniques was fully aligned with the template published by the BCBS as part of its August 2016 FAQs. Against comments that Template EU CR4 was too complex, it has also been streamlined by dropping columns c (CRM techniques with substitution effects), d (CRM techniques affecting the exposure amount) and e (value of off-balance-sheet items by conversion factors).

Regarding the disclosure requirements for the IRB approach, respondents argued against the disclosure of a breakdown of value adjustments and provisions by PD grade for the fixed PD grade bands provided in the master scale (template EU CR6, column I). The usefulness of such information is anticipated to be only limited, because most provisioning amounts are expected to be clustered around the lower end of the rating scale and defaulted exposures, and the disclosure is now only required as 'total' and 'subtotal'.

The granularity of templates on CCR has also been further simplified.

On market risk, two questions were included in the consultation paper for specific feedback regarding templates EU MR1-A and EU MR2-A. In order to address the comments received, the following changes have been applied: Template EU MR1-A has been removed from the guidelines, keeping only template EU MR1-B for the standardised approach, renamed as template EU MR1 in the new text; and template EU MR1 was, at the same time, streamlined. Finally, the qualitative table EU MRB-A, specifying the application of requirements of Article 104 (inclusion in the regulatory trading book) and Article 105 (requirements for prudent valuation) of the CRR, applicable to all positions in the trading book, has been dropped from the guidelines and this information has been added to tables EU MRA (qualitative requirements related to the risk management of market risk) and EU LIA (explanation of differences between accounting and regulatory amounts).

Figure 5: Summary of responses to the public consultation and the EBA's analysis

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
General comments			
Credit risk – Level of granularity	Several respondents indicated that the level of granularity is excessive.	The level of granularity depends on the need to be consistent with both the CRR requirements and the RPF. Since some of the templates are too complex, some templates have been streamlined.	Some templates have been simplified (see below).
Credit risk – Interaction between International Financial Reporting Standard (IFRS 9) and some templates	A respondent noted that some templates could be postponed to when the IFRS 9 would come into force. A respondent requested aligning some templates with the IFRS 9.	The interactions of some of the regulatory concepts in the CRR with the new accounting standards have not yet been fully confirmed at the EU level. The EBA defined the guidelines according to the current state of the CRR and cannot pre-empt the decisions on the interactions between regulatory and accounting concepts.	The paragraph requiring the future breakdown by impairment stages from 2018 has been deleted, not pre-empting the adoption of IFRS 9 and its treatment for regulatory purpose
Disclosure of the potential future exposure column in the CCR1 template	Firms generally agreed that this template is useful, but firms requested to remove the cell for potential future exposure for the IMM, as this is not an input used in that calculation.	The EBA agrees that potential future exposure is not relevant for IMM (it is, however, relevant for the mark-to-market method).	Grey out the cell for potential future exposure under the IMM.
Breakdown of standardised CCR exposures	A respondent asked to align the exposure classes for the CCR to CCR-specific classes used in the RPF. Some firms also proposed a disclosure of a breakdown of exposures according to credit quality steps, believing this to be helpful to users and for greater alignment with the CRR.	Respondents asked to align the disclosures to COREP as much as possible and, with this in mind, the EBA streamlined the exposure classes.	Map exposure classes to COREP, seeking to align with the BCBS proposals.
Columns in CCR4 (IRB exposures by portfolio	A number of respondents believed that the consultation draft included columns that are not relevant to the calculation of CCR RWAs. They requested that these	The EBA agrees that some of the columns are not required by the CRR for RWA calculation and that deleting them would increase alignment with the	Remove irrelevant columns from CCR4. Change column D to

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
and PD scale)	columns be deleted. They also proposed that column D is renamed 'EAD post CRM', as this is more relevant.	BCBS standards.	'EAD post CRM'.
Split of collateral into segregated and non-segregated	A small number of respondents felt that disclosing such a split exceeded the requirements of the CRR.	This split of collateral is included in the BCBS disclosure standards. This is also an area that will be included in the review of the CRR, and is useful information to keep in the disclosures.	No change.
Disclosure of impact of netting and collateral at the level of product type	There was agreement among respondents that disclosing the impact at this level is not meaningful, when this takes place at the counterparty level in practice.	The EBA agrees that would not be helpful for users.	Delete the rows for underlying product type, and only disclose at the level of derivatives/SFTs/cross-product netting.
Market risk – Applicable framework	Three respondents noted that it would make sense to consider templates compatible with the fundamental review of trading book.	The RPF updated with the fundamental review of the trading book will be applicable as of the end of 2019. The EBA guidelines are applicable (at the latest) from the end of 2017, requiring as much as possible data that is available in COREP.	No change.
Market risk – Level of granularity	Several respondents indicated that the level of granularity is excessive.	The level of granularity is imposed by the need to be consistent with both the CRR requirements and table MRB in the RPF.	No change.
Table EU CCRA	Some respondents questioned the additional requirement related to disclosures on CCP exposures.	It was assessed that this requirement is not specifically mentioned in the CRR.	All references to CCP have been dropped. Additionally, some legal references of table EU CCRA have been changed to better reflect the articles to which

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
			guidance is being provided for.
Responses to questions in the EBA Consultation Paper 2016/07			
Question 1: Do users prefer a comprehensive template providing a breakdown of capital requirements and RWAs by exposure classes for credit risk in Template EU OV1-B, or would they prefer to have the detailed breakdown by exposure classes provided in Template EU CR5-B for the standardised approach and Template EU CR6 for the IRB approach?			
	Most respondents preferred to provide the comprehensive breakdown in EU OV1-B rather than to implement it in both EU CR5-B and EU CR6, which would require significant IT investments. Several respondents also believe the implementation of EU OV1-B would be very demanding. It is also suggested that templates EU OV1-A and EU OV1-B should be merged.	The EBA is of the view that EU OV1-A provides an appropriate level of disclosure and that EU OV1-B can be removed, as similar information can be found in EU OV1-A and EU CR5 and EU CR6.	Use EU OV1-A (renamed OV1A) as the disclosure template and remove EU OV1-B.
Question 2: Do members prefer a breakdown by exposure classes for Article 442 of the CRR using the granularity from COREP, the CRR or the transparency exercise? In case users prefer a combination of the different exposure classes available in these breakdowns, please indicate the combination you would favour.			
Use of template COREP for the breakdown by exposure classes	Several respondents prefer a breakdown by exposure classes for Article 442 of the CRR using the granularity from COREP.	The using of COREP templates addresses the comments received.	Exposure classes aligned to COREP templates 9.1 and 9.2.
Question 3: Do you believe information on the exposure-weighted average maturity by PD grade is useful for understanding of an institution's IRB RWAs?			
Information on the exposure-weighted average maturity by PD grade	Two respondents took the view that this question is model driven; however, the implementation could cause additional cost due to new reporting/mappings.	The EBA notes the feedback provided.	No change.
	One respondent believed that this information can offer some insight into certain cohorts of business, but it can be difficult to interpret, particularly as a measure for benchmarking institutions.	Generally, institutions should complement the disclosures with explanations.	No change.

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
	<p>Some respondents answered that the information would not add value to the analysis of an institution's IRB RWAs.</p> <p>Furthermore, revealing information in a standardised exposure-weighted PD vs a maturity matrix could be misleading, due to differences in treatment of maturity in contracts in different markets/products and due to the fact that the maturity split between different PD grades can be volatile due to credit mitigation actions. Hence, qualitative and confidential information would be needed to make a fair comparison between the banks. This would be a good example of when more details would create more questions than answers.</p>	Average maturity need to be disclosed if relevant for the formula and is requested in the RPF.	No change.
	Standard deviations from these average numbers (including for PD, LGD, etc.) would also be useful.	There is no basis for such an enlargement, neither within the CRR nor within the RPF.	No change
Question 4: Would it be feasible to breakdown the value adjustments and provisions by PD grade for the fixed PD grade bands that are provided in the master scale? Would this information be useful to users?			
Breakdown of value adjustments and provisions by PD grade for fixed PD grade bands	<p>Many respondents answered that such a breakdown would be feasible, but the implementation would cause additional costs and the usefulness of such a disclosure would be questionable (high range of PD bands, thus limited comparability across banks).</p> <p>Most provisioning amounts are expected to be clustered around the lower end of the rating scale and defaulted exposures.</p> <p>It would be more appropriate that this reporting be deferred until such time as IFRS 9 is in place, the point being that—on implementation of IFRS 9—banks should be in a better position to draw out a range of granular</p>	The EBA notes the feedback provided.	No change. Disclosure of value adjustments and provisions is now required as 'total' and as 'subtotal' for each exposure class.

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
	<p>data enabling them to provide requested information as per the EBA's proposal.</p> <p>For collectively assessed provisions, if the calculation was not based on the same PD bands, then the breakdown across PD grades would have to be based on a pro rata methodology, which would limit its usefulness.</p> <p>It should be noted that collective impairments (general credit risk adjustments) are not necessarily available at exposure or counterparty level, so they cannot necessarily be fixed to PDs.</p>		
<p>Question 5. Is information on the sources of CCR (breakdown by type of transactions) for exposures measured under the IMM useful for users? Should this breakdown be expanded to the other methods of computation of the exposure value?</p>			
Breakdown of the IMM exposures into SFTs, derivatives, etc.	<p>While some respondents were concerned about whether this was useful, other respondents did think that a breakdown of exposures between SFTs and derivatives would be useful information. Respondents did not, however, think that it would be helpful to disclose breakdowns beyond this.</p>	<p>As the information will be useful, this breakdown will remain. This breakdown also ensures alignment to COREP where SFTs and derivatives are reported separately.</p>	No change.
<p>Question 6. Is the split of credit derivatives between used for the institution's own credit portfolio and one for credit derivatives used in the institution's intermediation activities useful or relevant to users? What definitions or policies do you currently use to identify credit derivatives for your own credit portfolio, and credit derivatives used for your intermediation activities?</p>			
Split of credit derivatives between those in the institution's own credit portfolio and those for intermediation activities	<p>Some respondents felt that the split of credit derivatives into two types, with one template for each, exceeded the requirements of the CRR.</p>	<p>The EBA agrees that the specification in two templates is not specifically mandated by the CRR.</p>	<p>Merge templates CCR6-A and CCR6-B into one template (CCR6) with no split by type.</p>

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
Question 7: Which impediments, if any (including issues of availability of information), currently prevent you from disclosing the information on total (the standardised approach plus the IMA) capital requirements by types of market risk as required under Article 445 of the CRR or are likely to render the disclosure of Template EU MR1-A unduly burdensome?			
Scope of information to be disclosed in Template EU MR1-A	Three respondents raise concerns (referring to e.g. IT developments) that prevent them from providing required information immediately. Others who did not raise concerns about providing information highlighted that the template would not provide the appropriate information to users (diversification effects or hedging benefits). They suggested retaining the breakdown by type of risks for the standardised approach and by models (VaR, SVaR, IRC, refers to 'comprehensive) for the IMA.	Template MR1 in the BCBS RPF is limited to positions in the trading book under the standardised approach. Information related to capital requirements in the IMA is presented in MR2 (with flow statements). A template EU MR1-B is for disclosure of capital requirements by type of risk for the standardised approach, with the data currently available in COREP.	Remove template EU MR1-A and retain only template EU MR1-B as template EU MR1.
Rows in template EU MR1-A	Four respondents noted that settlement risk and large exposures are subject to specific RWAs and capital requirement calculations not included in market risk. They suggested removing them from template EU MR1, noting that settlement risk is already included in EU OV1-A.	Template MR1 in the BCBS RPF does not include settlement risk and large exposures. In EU OV1, there is indeed already a row for settlement risk, making row 4 redundant.	Remove rows 4 and 5 from template EU MR1, and include a row for large exposures in template EU OV1.
Rows in template EU MR1-A	Three respondents suggested replacing position risk (row 1) by two rows 'interest rate risk (general and specific)' and 'equity risk (general and specific)' to align with COREP data.	This information is required in template EU MR1-B (now EU MR1) rows 1 and 2.	No change.
Rows in template EU MR1-A	Four respondents highlighted that a row is missing for risk not in VaR according to Article 101 of the CRD.	As template EU MR1 is now only for the standardised approach, potential additional capital charge for models should be included in the IMA template EU MR2-A.	Add a row 'other' in template EU MR2-A before the row 'total'.
Template MR1-B	One respondent asked for clarification regarding rows related to options and one suggested a clearer presentation for securitisation.	The breakdown for options is related to additional requirements for non-delta risks.	Specify this point for options. Align row 'securitisation' with row 'outright

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
			products' and with row 'options'.
Question 8: Is the separate disclosure of the end-of-period and average values for VaR, SVaR, IRC and comprehensive risk measure useful for users?			
Usefulness of data for users	Four respondents deemed that they could provide useful information to users on the risk profile of an institution and its evolution. Four respondents considered, conversely, that this disclosure is questionable. Some highlighted that this could lead to disclose proprietary and confidential information.	The values (average, floor and latest value at the reporting date) of VaR, SVaR, IRC and CRM are currently published bank-by-bank in the results of the EBA transparency exercise.	No change.
Question 9: Do you agree with the proposed scope of application of the guidelines?			
No answers received			
Question 10: In case you support the development of key risk metric template(s) that would apply to all institutions, which area of risks and metrics would you like to be covered in such template(s)?			
	Several respondents supported a key risk metric template but mentioned the importance of proportionality. Respondents suggested that the key metric template should not be mandatory for small, non-publicly traded banks. A few respondents also noted that a key metric template from the BCBS Phase II consultation on Pillar 3 is still to be finalised and, to ensure this standard is applied consistently globally, the EBA should wait until the template is finalised by the BCBS. The BCBS key risk metric template should form the basis of consultation on an equivalent key risk template in the EU. One respondent did not see any further benefit of a key metric template.	The EBA believes a key risk metric template should be developed, but will wait until the BCBS finalise their key metric template. The EBA is of the view that the key metric should be similar to the BCBS's version to ensure consistent implementation. Possible reconultation once the BCBS has been finalised.	No amendment. Wait until the BCBS finalise their template and then make appropriate amendments.
Question 11: Do you regard making available quantitative disclosures in an editable format as feasible and useful?			

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Editable format Feasible and useful?	<p>Only one respondent mentioned having no objection to making available the quantitative information in an editable format.</p> <p>Generally, this is feasible and useful, especially if it would be possible to create disclosure data and templates within the editable format only.</p> <p>However, implementation would require a parallel stream for disclosures made in an editable format vs the existing disclosures made in non-editable formats. The parallel stream will require additional cost, resources, complexity and a revalidation burden (particularly for smaller companies), which may outweigh the benefit for users.</p> <p>Moreover, the value added of editable formats for quantitative disclosure is limited since this information would also have to be backed by qualitative aspects of the disclosure report.</p> <p>The key issue is to ensure that Pillar 3 data made available in an editable format—in addition to the current format of reporting—is secured and reliable. The new channel of information implies that credit institutions would have to deal with issues related to policy, protection of confidential and proprietary information, as well as security of data.</p> <p>Banks have no influence on the transfer of the editable data to third parties; possible differences between the full disclosure and the editable format might be wrongly interpreted. Banks would then need to explain the</p>	<p>The general impression is that all of the respondents have a negative attitude to whether it is feasible and useful for quantitative disclosures to be presented in an editable format in addition to the stand-alone document referred to in Section 4.2, Section D of the guidelines.</p> <p>Most of the answers seem justified and therefore EBA does not have objections.</p> <p>Disclosure in an editable format may be useful for some stakeholders but additional cost and resources could overburden the institutions, which may outweigh the benefit to the users.</p> <p>It was assessed that, in the final draft guidelines, the wording would change in the following way 'institutions may (instead of should) make available on their website and in an editable format the quantitative templates provided in the guidelines'.</p> <p>Based on that, Section 4.16 'Dissemination of information' leaves it up to the institutions themselves to decide if they are willing to provide this service to users, encouraging the use of this best practice.</p>	<p>EBA encourages this measure.</p> <p>In paragraph 141, a change has been made to 'may' instead of 'should'.</p>

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
	<p>reasons for such differences, which could cause significant problems.</p> <p>In addition, quantitative disclosure in an editable format might increase the risk of manipulation and could cause confusion or wrong interpretations of the respective template.</p> <p>Some of the respondents proposed that institutions be given the freedom to decide themselves whether they want to provide disclosures in an editable format in addition to the existing disclosures made in non-editable formats, or disclosures in an editable format to be provided only for templates that are considered high usage and which users would find most useful.</p>		
<p>Question 12: In case you do not support making available all quantitative information specified in these guidelines under an editable format, which subset of quantitative information should, in your views, be made available?</p>			
<p>Proposals on which subset should be made available in editable format</p>	<p>Most of the respondents disagreed with the approach of Question 11 and strongly rejected any quantitative information disclosed under an editable format.</p> <p>They proposed that a more limited set of key risk metrics would be more helpful to the users of disclosures in order to allow them to readily compare the most important risk indicators within each institution.</p> <p>Some of them believed that the decision regarding additional information should be taken by the institutions themselves in accordance with the different risk/business</p>	<p>Please refer to the EBA's analysis of Question 11 mentioned above.</p>	<p>Please refer to the amendments to the proposals of Question 11 mentioned above.</p>

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
	and threshold structures. This would also be in line with the original intention of Pillar 3.		
Question 13: Does an early implementation of a selected set of information specified in these guidelines appear feasible?			
Early implementation of a set of templates	Many comments were received regarding the early application statement that encourages the early implementation of the guidelines as of end December 2016 for some institutions. Respondents complained that early implementation does not appear feasible at this stage. For the disclosure of a selected set of 2016 year-end data, it is necessary to update existing systems and processes to ensure accurate and complete templates can be produced for the 2016 year end in time. Updated processes will need to include a smooth running of governance that enables appropriate oversight and sign-off. This will require a period of post-implementation review and analysis of templates (a parallel run with the already embedded formats and tables used by the banks) in order to assess the impact of the changes proposed in the draft guidelines and to smoothen out any process issues.	All the templates that are included in the early application statement are based on regulatory calculations, supervisory reporting data that the EU institutions are used to reporting on a quarterly basis. These templates do not deviate at all from the RPF published in January 2015. Therefore, institutions have been familiarised since then with this information.	The EBA goes ahead with the early implementation statements, which is published together with the guidelines in similar terms to the statement included in the consultation paper.
Question 14: Which amendments, if any, would you bring to the selected set intended to be included in the recommendation for early application?			
No answers received			
Question 15: Do you agree with the content of these guidelines? In case of disagreement with specific parts of these guidelines, please outline alternatives regarding these specific part(s) to achieve the implementation of the RPF in a fully compliant way with the current CRR requirements.			
Template EU LI1, title of column g	One respondent suggested rewording the title of column g as follows, for the purpose of clarity: 'Subject to	For consistency reasons with the RPF, the title as per the consultation paper is being kept unchanged.	No change.

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	deduction from capital or not subject to regulatory capital requirements'.		
Template EU LI1 – First implementation	One respondent suggested postponing the first implementation to December 2018, instead of December 2017, given the changes that will come with IFRS 9 from 1 January 2018.	This is a more general matter that will affect all the disclosures related to financial statements. In addition, postponing the first implementation date will imply a further delay relative to the RPF.	No change.
Template EU LI1 – Liabilities	One respondent suggested that the rows in the balance sheet related to liabilities should be removed from template LI1. Liabilities may only attract risk requirements where they have been subject to netting or offsetting treatment. As a result, liabilities would substantially be reported in column g, which would be of minimal value to users.	The inclusion of liabilities in this template is important to better understand the mapping of financial statement categories with regulatory risk categories.	No change.
Template EU LI2 – Column 'total'	According to one respondent, column 'total' should be removed because the headings of rows 1 and 2 suggest that the content to the right will equal totals from template EU LI1, but EU LI1 includes elements of the balance sheet that are not subject to the regulatory framework. Template LI2 is focused on assets in the regulatory scope of consolidation that are subject to the regulatory framework.	The Basel Committee's recent clarification on the content of the column 'total' should be enough to prevent the misunderstanding mentioned by the respondent (see FAQ 3 (a) on the RPF disclosure requirements).	No change.
Template EU LI2 – Off-balance-sheet amounts.	According to one respondent, template EU LI2 only requires (for row 4 'off-balance-sheet amounts') a disclosure of off-balance-sheet original exposure prior to the application of the conversion factor. Consequently, the result for row 10 cannot be deducted from the values in the previous rows. The respondent believed that it is not necessary to differentiate in row 4 between off-	It is right that: (1) row 4 'off-balance-sheet amounts' refers to the disclosure of off-balance-sheet original exposure, prior to the application of the conversion factor, and (2) 'the exposure amount considered for regulatory purposes' in row 10 includes, among others, off-balance-sheet amounts after the application of CCFs (according to Article 111 of the	No change.

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
	balance-sheet original exposure prior to the use of the conversion factor and after the application of the conversion factor.	CRR). However, keeping the difference in row 4 between off-balance-sheet original exposure prior to the use of the conversion factor and after the application of the conversion factor will help users understand differences between the accounting carrying amount under the regulatory scope of consolidation and the regulatory exposure value.	
Template EU Regulatory amount	One respondent asked for clarification on how the reconciliation is to be performed regarding the requirement in template EU LI2 to reconcile the 'exposure amount used for regulatory purposes' back to the carrying value at the balance sheet, given that (for market risk where internal models (VaR) are applied) there is no 'exposure amount for market risk according to the CRR.'	The guidelines state that, for market risk, the reconciliation should be made with market risk exposures corresponding to the positions subject to the market risk framework in Part Three, Title IV of the CRR.	No change.
Template EU Content	One respondent argued that the requirement to provide disclosures for credit risk, CCR, securitisation and market risk separately for each of the approaches used goes beyond the requirement for the same template in the BCBS standards.	To remove the sentence: 'Where relevant, the reconciliation can distinguish ... for the market risk framework' from the template.	The following sentence 'where relevant, the reconciliation can distinguish ... for the market risk framework' was removed from the template.
Template EU Accompanying narrative	One respondent showed their disagreement with the requirement that banks 'that do not provide one of the rows listed in the template ... should explain the reasons for the absence of the specific row'.	To remove the sentence: 'Institutions that do not provide one of the rows listed in the template should explain the reasons for the absence of the specific row' from the accompanying narrative.	The following sentence 'institutions that do not provide one of the rows listed in the template should

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Template EU LI3 – Entity by entity	Many respondents referred to the significant burden that the disclosure 'entity by entity' would imply for larger groups and the limited benefits for investors and other stakeholders of this information.	To make this template more meaningful for users and less burdensome for institutions, it should only include those entities where the method of accounting consolidation differs from the method of regulatory consolidation.	explain the reasons for the absence of the specific row' was removed from the accompanying narrative. The content of EU LI3 was changed to clarify that, under this template, only those entities where the method of accounting consolidation differs from the method of regulatory consolidation should report the requested information.
Table EU LIA – Clarification	A respondent asked for confirmation that it is not necessary to present the qualitative disclosures in the form of the (flexible) table shown in the consultation.	Institutions may present the information in this table either under the format provided in the guidelines or in one that better suits them.	
Table EU LIA – Prudent valuation	According to one respondent, LIA c) is pulled in from Article 455 and, therefore, the respondent believed that the requirement is not relevant to firms solely using the standardised approach.	Information reported under LIA c) is meaningful for both institutions using the standardised approach and the IMA. As the respondent rightly points out, Article 455 is the legal basis for internal models, as Article 435(a) and (c) is the legal basis for the standardised approach.	

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
Template EU CR10	<p>Respondents supported the template but a few respondents mentioned that disclosure of on-balance-sheet and off-balance-sheet amounts and EL goes beyond the CRR requirements. However, they also mentioned these are available from COREP and thus should present no issue to disclose.</p> <p>One respondent suggested that the template should include, in line with the BCBS CR10 template, a breakdown of specialised lending into HVCRE and specialised lending other than HVCRE, where other HVCRE includes a breakdown into sub-components including project finance, object finance, commodities finance and income producing real estate. The guidelines have amalgamated these into one category. One respondent found the template appropriate and useful to users and no change is needed.</p>	<p>The EBA considers the disclosures to be appropriate and respondents have given support for the template. Information on on-balance-sheet and off-balance-sheet amounts and EL are available in COREP.</p>	No amendments.
Template EU INS1	<p>Several respondents considered the template to not be in line with the CRR and there should not be any disclosure requirement on insurance participations. Their concern is that requiring institutions that have been granted an exemption decision to disclose the carrying amount would seriously undermine the effect of the decisions. Respondents believe that institutions are not required to disclose this information by Article 49(5) of the CRR under which banks are required to disclose the supplementary own funds requirement and capital adequacy of the financial conglomerate but not provide details on the RWAs of the holdings not deducted.</p> <p>Respondents also mentioned that the RPF does not require the disclosure of the amount of non-deducted</p>	<p>The EBA is of the view that the disclosure is appropriate and should be provided as part of the information on capital requirements from Article 438(c) and (d). The EBA believes these disclosures provide additional information and enable users to assess the impact on non-deduction in terms of additional RWAs.</p>	No amendment. Keep template INS1.

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	holdings of own funds in insurance companies. One respondent believed the disclosure to be appropriate and useful to users, and supported the disclosure template.		
Templates EU CRB-B-C-D-E	A respondent recommended a fixed template for rows and columns. Moreover, the respondent recommended that exposures classes are aligned with template OV1-B. A respondent observed that the row 'other non-credit obligation assets' has been missed.	See the answer above (Question 2).	See the answer above (Question 2).
Templates EU CRB-B-C-D-E	Four respondents observed that the amount requested for the credit risk templates (CRB B-E) is a balance sheet carrying value. Institutions usually disclose regulatory exposure value for credit risk (EAD).	We have used the net carrying values of on-balance-sheet and off-balance-sheet exposures (corresponding to the accounting values reported in financial statements but according to the scope of regulatory consolidation as per Part One, Title II, Chapter 2 of the CRR) to make the information more comparable at global level (consistent with the RPF).	Net values retained.
Templates EU CRB-B-C-D-E and EU CR2-B	Some respondents requested some adjustments of the labels in order to be consistent with the templates.	Some labels are not consistent with the templates.	Labels adjusted.
Template EU CRB-B	Several respondents proposed, as average net exposure over the period, the average of the net exposure values observed at the end of each quarter of the observation period.	The average of the net exposure values observed at the end of each quarter of the observation period does not add other costs for banks (which already have this information for reporting and is accurate enough).	Quarterly average used.
Template EU CRD	One respondent asked to clarify that it is not necessary to present the qualitative disclosures in the form of the (flexible) table shown in the consultation, and that the qualitative information could be presented throughout the document in a free text format.	Institutions can disclose the flexible table with additional qualitative information in a free text format.	Free text allowed.
Templates EU CR1-A-B-C	Some respondents noted that the combined breakdown by defaulted/non-defaulted, impaired/not impaired and past-due exposures (in templates CR1-A, CR1-B and CR1-C) has been considered excessive.	The templates are too complex and were not clear to users. The templates have been simplified in accordance with the RPF.	Templates streamlined.

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
Templates EU CR1-A-B-C	<p>Some respondents requested a confirmation for:</p> <ul style="list-style-type: none"> - The starting point for each period reported; - The accumulated write-offs; - The formula in the column of 'net value'. 	<p>The starting point for each period is always the beginning of the reporting period.</p> <p>The term 'accumulated write-offs' includes the cumulative amount of principal and past-due interest of any debt instrument that the institution is no longer recognising because they are considered uncollectible.</p> <p>The formula of 'net value' is: a+b-c-d-e.</p>	Clarifications provided.
Templates EU CR1-B-C	A respondent suggested deleting the rows 'of which', which give a breakdown by type of instruments, as these are already reported in the template CR1-A.	The rows 'of which' provide the same information as CR1-A.	
Template EU CR1-D	A respondent noted that is not useful to split into the standard approach and IRB approach since we used information from COREP and FINREP together.	The breakdown by the standardised approach and IRB approach is not strictly requested by the CRR and the RPF.	Breakdown deleted.
Template EU CR2-A	<p>A respondent noted that the last two rows of the template (i.e. 'direct partial or total write-offs' and 'recoveries of direct partial or total write-offs') are not included in the CRR requirements.</p> <p>Some respondents observed that:</p> <ul style="list-style-type: none"> - The implementation of the template could be postponed to December 2018; - Separate evidence for 'change in collectively assessed loan losses' could be given; - The row on the impact of exchange rate differences could be deleted. 	<p>The template needs to be consistent with the current template in FINREP, which does not include the rows on write-offs.</p> <p>The other information added on (i.e. 'impact of exchange rate differences' and 'business combinations, including acquisitions and disposals of subsidiaries') is imposed by the CRR requirements.</p>	Rows 'direct partial or total write-offs' and 'recoveries of direct partial or total write-offs' are deleted.
Template EU CR3	<p>Several respondents noted that:</p> <ul style="list-style-type: none"> - The exposures class should be aligned to template OV1- 	<p>The structure of the template CR3 is too complex for users. The template has been aligned with the RPF.</p> <p>Moreover, the instructions include the clarification</p>	Template aligned with the RPF.

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
	<p>B;</p> <ul style="list-style-type: none"> - The breakdown by 'before on-balance-sheet or off-balance-sheet netting' could be deleted; - It should be clarified how to fill the template when there is an exposure with multiple types of CRM and is over collateralised; - The template could be amended in order to reconcile it with COREP templates; - The value that is to be ascribed to the collateral, guarantees and CDS should be clarified. <p>A respondent proposed deleting the template, since it goes beyond the RPF.</p>	<p>of the treatment of exposures with multiple types of risk mitigants.</p>	
Template EU CR4	<p>Several respondents noted that requirements under columns c (CRM techniques with substitution effects), d (CRM techniques affecting the exposure amount) and e (value of off-balance-sheet items by conversion factor) go beyond CRR requirements.</p>	<p>The template seems to be too complex and detailed.</p>	<p>Columns c (CRM techniques with substitution effects), d (CRM techniques affecting the exposure amount) and e (value of off-balance-sheet items by conversion factors) of Template EU CR4 as per the consultation paper have been dropped.</p>
Templates EU CR5-A and	<p>Several respondents noted that this template is similar to that from the BCBS Phase 1 and that the information</p>	<p>Under column 'deducted' should report exposures to</p>	<p>Template EU CR5-A has been dropped</p>

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EU CR5-B	<p>required is more detailed than the related Article 444(e), which refers specifically to credit quality steps. This respondent suggested aligning the exposure classes with the standardised exposure classes presented in template OV1-B 'overview by exposure class'. The respondent also suggested that banks should report all exposures, including those unrated, in the relevant risk weight column, in order to enable users to calculate RWAs from the data presented. Separately (to the right hand side of the 'total' column), they suggested including a column 'Of which: unrated exposures'.</p> <p>The same respondent asked for the following clarifications:</p> <ul style="list-style-type: none"> - The type of exposures to be disclosed in the column 'deducted'; - The use of the column 'unrated'. It is interpreted that any unrated exposures would be allocated to the risk weight column that will be applied to that exposure in the calculation of RWAs to enable the user to calculate RWAs from the information provided. 	<p>be deducted according to Part Two of the CRR.</p> <p>The column 'unrated' should be reworded as 'of which unrated' and should include exposures for which a credit assessment by a nominated ECAI is not available, applying specific risk weights depending on their class. These exposures should be reported separately per risk weight applicable and then under the 'of which unrated' column.</p>	<p>and Template EU CR5-B renamed as EU CR5. COREP exposure classes are applied. The original column 'unrated' has been renamed as 'of which unrated'.</p>
Geographical breakdown of model parameters		The provisions as per included in the consultation paper are not included in the RPF.	These provisions have been dropped from the final guidelines.
Table EU MRB-A	Some respondents noted that disclosure requirements in this table regarding the inclusion of positions in the regulatory trading book and prudent valuation are currently included in Article 455(c) of the CRR related to	Articles 104 and 105 (referred to in Article 455(c) of the CRR) are applicable to all positions in the trading book. The qualitative disclosure requirements in table EU MRB-A specifies the application for market	Table EU MRB-A has been removed. Requirement (a) from this template

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
	the use of the IMA only.	risk (i.e. all positions in the trading book) of Article 435(1)(a) related to the strategies and process to manage risks and Article 435(1)(c) related to the measurement systems.	has been included in table EU MRA and requirement (b) in table EU LIA.
Table EU MRB-B	Some respondents asked for clarification regarding requirements that are redundant with the CRR—in particular, those which are duplicated for each type of model in the application of Article 455(a)(ii) and (iii).	To complete with general answers from Legal.	
Template EU MR2-B	Five respondents raised concerns with row 6 'foreign exchange movements', as they considered this impossible to provide.	The Basel FAQ on the RPF published in August 2016 provides clarification on this point.	Modifications in the Basel FAQ included.
Template EU MR2-B	A respondent indicated that some of the rows should be based on a rough estimate.	Specified in the content (reasonable estimation of the figures).	No change.
Template EU MR2-B	Most of the respondents requested clarification on the use of rows 1a/1b and 8a/8b. Some of them suggested alternative presentation.	These rows have been added following the Basel FAQ on the RPF published in August 2016 to address the concern of some preparers who are not able to provide information on the key changes if their regulatory value is the average value.	Added clarification and remaining aligned with the RPF template MR2.
Elements related to Part Four, sections 4.3, Section C	Several respondents commented on paragraph 8 of the draft guidelines, which extended some elements of the scope of application beyond G-SIIs and O-SIIs to significant subsidiaries. The respondents considered that this exceeds the requirements of Article 13 of the CRR.		Text in the guidelines has been changed to align it with Article 13 of the CRR.
EU OVA – Req (a)	Several respondents highlighted that the requirement to disclose the nature, extent, purpose and economic substance of transactions within the group, affiliates and related parties is proprietary information, and goes beyond the current CRR requirements and the RPF. In addition, one respondent stated that the current requirements focus on processes, rather than look at		The text in the template was redrafted in order to cover only transactions with material impact.

Comments	Summary of responses received	The EBA's analysis	Amendments to the proposals
EU OVA – Req (b)	<p>actual transactions.</p> <p>Several respondents highlighted that this requisite in template EU OVA prescribes a significant level of granularity over and above the current requirements, with little evidence that the market actually needs more than is already required through the CRR.</p>		<p>The text in the template was reworded, replacing 'should' with 'may'.</p>
<p>Q16. Do you agree with the impact assessment? In case of disagreement, please identify areas where costs and benefits are misstated or suggest alternative options.</p>			
	<p>While respondents agreed with the impact assessment, they complained again about the excessive granularity of the guidelines, particularly regarding those requirements that are not envisaged under the CRR or the BCBS framework. They also complained about the duplication of requirements (the RPF and the CRR) for those institutions operating outside the EU.</p>	<p>The alignment of the guidelines with RPF and with the CRR should allow institutions to comply with both frameworks simultaneously by applying these guidelines.</p> <p>The final guidelines have streamlined the proposal included in the consultation paper, following the feedback provided by respondents.</p>	