

EBA/CP/2015/07

29 April 2015

Consultation Paper

Draft regulation amending the RTS on the identification methodology for global systemically important institutions (G-SIIs)

Draft regulation amending the ITS on uniform format and dates for the disclosure by G-SIIs

Draft revised guidelines on the further specification of the indicators of global systemic importance and their disclosure

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1. Responding to this consultation

The EBA invites comments on all proposals put forward in this paper.

Comments are most helpful if they:

- respond to the question stated;
- indicate the specific point to which a comment relates;
- contain a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- describe any alternative regulatory choices the EBA should consider.

Submission of responses

To submit your comments, click on the 'send your comments' button on the consultation page by 20 May 2015. Please note that comments submitted after this deadline, or submitted via other means may not be processed.

Publication of responses

Please clearly indicate in the consultation form if you wish your comments to be disclosed or to be treated as confidential. A confidential response may be requested from us in accordance with the EBA's rules on public access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by the EBA's Board of Appeal and the European Ombudsman.

Data protection

The protection of individuals with regard to the processing of personal data by the EBA is based on Regulation (EC) N° 45/2001 of the European Parliament and of the Council of 18 December 2000 as implemented by the EBA in its implementing rules adopted by its Management Board. Further information on data protection can be found under the Legal notice section of the EBA website.

2. Executive Summary

The EBA methodology to identify global systemically relevant institutions (G-SIIs) closely follows the approach of the Basel Committee on Banking Supervision (BCBS) for identifying global systemically important banks (G-SIBs, in BCBS terminology). The list of EU G-SIBs identified by the BCBS and the G-SIIs identified by Member States' authorities are identical. In January 2015 the BCBS published a new data template with minor revisions for the year 2015 identification exercise, based on end-2014 business year data.

As a consequence, the RTS on the identification methodology and the ITS on disclosure, which contained a data template have been updated. For practical reasons, the full data template with the detailed specification of the indicator values will now only be incorporated in the guidelines. The instructions for institutions as how to complete the template will be published on the EBA website.

Next steps

The draft RTS and ITS will be submitted to the Commission for endorsement following which the RTS will be subject to scrutiny by the European Parliament and the Council before being published in the Official Journal of the European Union.

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

3. Background and rationale

The EBA methodology to identify global systemically relevant institutions (G-SIIs) closely follows the approach of the Basel Committee on Banking Supervision (BCBS) for identifying global systemically important banks (G-SIBs, in BCBS terminology). The list of EU G-SIBs identified by the BCBS and the G-SIIs identified by Member States' authorities are identical. This is in line with Directive 2013/36/EU, which requires the methodology to take into account international agreed standards. In January 2015 the BCBS published a new data template with minor revisions for the year 2015 identification exercise, based on end-2014 business year data.

As a consequence, the RTS on the identification methodology and the ITS on disclosure, which contained a data template have been updated. For practical reasons, the full data template with the detailed specification of the indicator values will now only be incorporated in the guidelines. The instructions for institutions as how to complete the template will be published on the EBA website.

As the data collection for the year 2015 has already started, the consultation period for these drafts will be three weeks only.

4. Draft regulation amending the regulatory technical standards on the identification of G-SIIs

COMMISSION DELEGATED REGULATION (EU) No .../..

of **XXX**

amending Regulation (EU) No 1222/2014 with regard to regulatory technical standards for the specification of the methodology for the identification of global systemically important institutions and for the definition of subcategories of global systemically important institutions

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC¹, and in particular Article 131(18) thereof,

Whereas:

- (1) Commission Regulation (EU) No 1222/2014 specifies the methodology of identification and allocation of global systemically important institutions (G-SIIs) based on five categories measuring the systemic significance of a bank for the global economy. In order to follow the approach of Directive 2013/36/EU, Regulation (EU) No 1222/2014 took into account the then international standards developed by the Basel Committee on Banking Supervision (BCBS) for the methodology to assess global systemically important banks and for the higher loss absorbency requirement, that are based on the framework for global systemically important financial institutions established by the Financial Stability Board following the report 'Reducing the moral hazard posed by systemically important financial institutions – FSB Recommendations and Time Lines'. The Annex of Regulation (EU) No 1222/2014 contained a set of data specifying the indicators used for the identification of G-SIIs that was identical to that used by the BCBS for the identification of global systemically important banks.
- (2) In January 2015, the BCBS has published an updated set of data specifying these indicators. In the future further updates are expected. It is of the utmost importance to keep the identification methodology up to date, in order to reflect current

¹ OJ L 176, 27.6.2013, p. 338.



developments of the global banking system and to take into account updated international standards. To this end Member States' relevant authorities should at all times use an updated specification of the indicators set out in Regulation (EU) No 1222/2014. Therefore Regulation (EU) No 1222/2014 should be amended and the Annex with the outdated data should be deleted.

- (3) The identification process should take into account the institutions' need of clarity at an early stage as to which data they have to report. This would be severely delayed if Regulation (EU) No 1222/2014 would have to be amended and updated every year solely to reflect minor technical changes. In particular, it is unclear when international standards are updated and when stable updates of these standards are publicly available. At the same time the process for specifying the indicators in Regulation (EU) No 1222/2014 is well established, so that a harmonised specification of such indicators across the Union can be achieved by means other than in the form of a regulation. In addition, authorities have appropriate fora and sufficient incentives to agree on a uniform specification of the indicators. Against this backdrop, the replacement of the Annex by an updated specification does not seem an effective approach, since it would be expected to be very soon outdated again.
- (4) This Regulation should apply immediately, since institutions need clarity as to which data should be reported for the identification process in 2015, and the data collection process starts in the first quarter of 2015.

HAS ADOPTED THIS REGULATION:

Article 1

Amendments to Regulation (EU) No 1222/2014

- (1) In Article 5(6) the term 'indicators' is replaced by the term 'data'.
- (2) In paragraphs 1 to 5 of Article 6 the words 'as specified in the Annex' are deleted.
- (3) Article 7 is deleted.
- (4) The Annex is deleted.

Article 2

Entry into force

This Regulation shall enter into force on the day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

*For the Commission
The President
Jean-Claude Juncker*

5. Draft regulation amending the implementing technical standards on the uniform format and date of disclosure by G-SIIs

COMMISSION IMPLEMENTING REGULATION (EU) No .../..**of ~~XXX~~****amending Regulation (EU) No 1030/2014 with regard to the uniform formats and date for the disclosure of the values used to identify global systemically important institutions**

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012, and in particular the third subparagraph of Article 441(2) thereof,

Whereas:

- (5) Commission Regulation (EU) No 1030/2014 specifies the uniform format for the disclosure of the indicator values used in the process of identification of global systemically important institutions (G-SIIs) in accordance with Article 131 of Directive 2013/36/EU of the European Parliament and of the Council². According to that regulation the disclosure templates used by institutions identified as G-SIIs should take into account international standards, particularly those issued by the Basel Committee on Banking Supervision (BCBS). The template in the Annex of Regulation (EU) No 1030/2014 mirrors that used by the BCBS for the year 2014. In January 2015, the BCBS has published an updated template which will be further updated in the future. To keep the identification methodology up to date, reflect current developments of the global banking system and take into account updated international standards, relevant authorities should always use an up-to-date template. Therefore Regulation (EU) No 1030/2014 should be amended and the template in the Annex with the outdated data should be replaced by a template suitable to be applied under the current and future updates.
- (6) This Regulation should apply immediately, as institutions need clarity as to which data have to be disclosed for the identification process in 2015 and the data collection process starts in the first quarter of 2015.

HAS ADOPTED THIS REGULATION:

*Article 1**Amendments to Regulation (EU) No 1030/2014*

- (1) The first sentence of Article 1(1) is replaced by the following: ‘G-SIIs shall report the data (indicators and ancillary data) used to identify global systemically important

² Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC Text with EEA relevance (OJ L 176, 27.6.2013, p. 338).



institutions to the relevant authority in electronic format using the template in the Annex, including further specifications of the underlying data and following the instructions issued by the relevant authority each year'. In the second sentence of Article 1(1) the words 'and following these instructions' are inserted after the word 'template'.

(2) Article 3(3) is amended and shall read as follows:

'3. Without undue delay, following the disclosure of that information by the G-SIIs, relevant authorities shall send those completed templates, including the ancillary data and ancillary indicators, to the EBA. The EBA shall disclose the completed template, excluding ancillary data and ancillary indicators, on its website for centralisation purposes.'

(3) The template in the Annex is replaced by the following template:

Indicators required to identify G-SIIs

General Bank Data

Section 1: General Information	
a. General information provided by the national supervisor:	
(1) Country code	
(2) Bank name	
(3) Submission date (yyyy-mm-dd)	
b. General Information provided by the reporting institution:	
(1) Reporting date (yyyy-mm-dd)	
(2) Reporting currency	
(3) Euro conversion rate	
(4) Reporting unit	
(5) Accounting standard	
(6) Location of public disclosure	

Size Indicator

Section 2: Total Exposures	Amount

Interconnectedness Indicators

Section 3: Intra-Financial System Assets	Amount

Section 4: Intra-Financial System Liabilities	Amount

Section 5: Securities Outstanding	Amount

Substitutability/Financial Institution Infrastructure Indicators

Section 6: Payments made in the reporting year (excluding intragroup payments)	Reported in	Amount in specified currency	Amount

Section 7: Assets Under Custody	Amount

Section 8: Underwritten Transactions in Debt and Equity Markets	Amount

Complexity Indicators

Section 9: Notional Amount of Over-the-Counter (OTC) Derivatives	Amount

Section 10: Trading and Available-for-Sale Securities	Amount

Section 11: Level 3 Assets	Amount



Cross-Jurisdictional Activity Indicators

Section 12: Cross-Jurisdictional Claims	Amount
Section 13: Cross-Jurisdictional Liabilities	Amount
Ancillary data	
Section 14: Ancillary indicators	Amount
Section 15: Ancillary items	Amount

Article 2

Entry into force

This Regulation shall enter into force on the day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

For the Commission
The President
Jean-Claude Juncker

6. Draft revised guidelines on the further specification of the indicators of global systemic importance and their disclosure

Background and rationale

The RTS on the methodology for the identification of G-SIIs set out a list of indicators to be used for the identification. The further specification is left to relevant authorities and shall be updated every year in accordance with international standards. To ensure convergent practice and uniform underlying value, the further specification of the indicators is harmonised in these Guidelines.

Uniform and meaningful disclosure requirements are necessary to guarantee fair competition between comparable groups of institutions and to ensure greater convergence of supervisory practices and the accurate assessment of risks across the EU. They improve data quality and strengthen market discipline. With this in mind, G-SIIs should be subject not only to additional capital requirements, but also to greater public scrutiny than average institutions. These disclosure requirements should not only apply to institutions that have already been identified as G-SIIs, but also to other large entities that have an overall exposure exceeding EUR 200 billion, which fall into the scope of Article 131(1) of Directive 2013/36/EU, as they also constitute a potentially significant threat to financial stability. The Guidelines go beyond the requirements of the Regulation, which only addresses G-SIIs, and also aim to enable Member State authorities to perform the identification and scoring process and disclosure, in particular before any G-SIIs have been identified. The Guidelines are addressed to both competent authorities and institutions.

To ensure comparability in order to facilitate the work of Member States' authorities, as well as scrutiny by the public at large, and to achieve the aim of improving data quality and strengthening market discipline, the means of disclosure should also be uniform. Therefore the Guidelines go beyond Article 434 of the Regulation and state that all institutions subject to the disclosure requirements should disclose the data concerned in electronic form on their websites. Detailed instructions on how to complete the templates have been included in the Guidelines. Further questions of institution should be discussed with the relevant competent authority.

The bundle of the RTS on the identification methodology of G-SIIs, the ITS on disclosure and these Guidelines will be under ongoing review as the BCBS identification process provides for regular reviews of the identification methodology every three years.



Status of these Guidelines

This document contains guidelines issued pursuant to Article 16 of 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 Commission Decision 2009/78/EC (*the EBA Regulation*). In accordance with Article 16(3) of the EBA Regulation, competent authorities and financial institutions must make every effort to comply with the guidelines.

Guidelines set out the EBA's view of appropriate supervisory practices within the European System of Financial Supervision or of how Union law should be applied in a particular area. The EBA therefore expects all competent authorities and financial institutions to whom guidelines are addressed to comply with guidelines. Competent authorities to whom guidelines apply should comply by incorporating them into their supervisory practices as appropriate (e.g. by amending their legal framework or their supervisory processes), including where guidelines are directed primarily at institutions.

Reporting requirements

According to Article 16(3) of the EBA Regulation, 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 [...]. 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 provided at Section 5 to compliance@eba.europa.eu with the reference 'EBA/GL/201x/xx'. Notifications should be submitted by persons with appropriate authority to report compliance on behalf of their competent authorities.

Notifications will be published on the EBA website, in line with Article 16(3).



Title I - Subject matter, scope and definitions

1. The Guidelines relate to

(a) the specification of the indicators ('indicators') for the year 2015 set out in Regulation (EU) No 1222/2014 as amended; and

(b) the reporting of the data (indicators and ancillary data used for the identification of G-SIIs) and the annual disclosure of the values of the indicators.

2. The Guidelines apply to (i) EU parent institutions, EU parent financial holding companies, EU parent mixed financial holding companies and institutions that are not subsidiaries of an EU parent institution or EU parent financial holding company or EU parent mixed financial holding company ('relevant entities') which observe a leverage ratio exposure measure exceeding EUR 200 billion using an adequate exchange rate, which takes into account the reference exchange rate published by the European Central Bank applicable at the financial year end and international standards, and (ii) to competent authorities within the meaning of point (40) of Article 4(1) of Regulation (EU) No 575/2013, including the European Central Bank with regard to matters relating to the tasks conferred on it by Regulation (EU) No 1024/2013.

Title II – Specification of the data for the identification of G-SIIs

3. When determining the scores of relevant entities on the basis of the indicators, relevant authorities should apply the specifications of the data in the Annex to these Guidelines. When reporting the data, relevant entities should follow the instructions published on the EBA website.

4. Competent authorities should apply the ancillary data (Sections 14 and 15 of the Annex) to support their supervisory judgement in accordance with Article 5(6) of Regulation (EU) no 1222/2014 as amended and, on a best efforts basis, the memorandum items (Sections 16 to 20 of the Annex) to improve the data quality and to help developing future improvements to the identification methodology. The memorandum items should be complemented by comments regarding data quality and availability where appropriate.

Title III- Requirements regarding disclosure by institutions

5. The competent authorities should ensure that the relevant entities report to relevant authorities the data (indicators and ancillary data) and publicly disclose the data and indicator values under Sections 1 to 13 of the Annex on an annual basis and in accordance with the identification methodology referred to in Article 131 of Directive 2013/36/EU.

6. The competent authorities should ensure that the disclosure is made using the electronic template published for this purpose on the EBA website in accordance with the implementing technical standards adopted pursuant to Article 441 of Regulation (EU) No 575/2013 and with the Annex to these Guidelines. The relevant entities should publicly disclose the financial year-end information no later than four months after each financial year-end. The competent authorities may allow relevant entities whose financial year-end does not coincide with 31 December to report indicator values based on their position closer to 31 December. In any case, disclosure of the information should occur no later than 31 July.



7. The competent authorities should ensure that the data are identical to those submitted to the Basel Committee on Banking Supervision, where applicable.

Title IV- Communication of disclosed values of indicators

8. The relevant entities should publish their individual templates on their websites. Insofar as possible, these templates should also be included in the document containing information requested as specified in Part Eight of Regulation (EU) No 575/2013 of 26 June 2013, or a reference should be made in this document to the website where the templates are disclosed.
9. The competent authorities should provide the EBA with the values of the data, including ancillary data, when they are publicly disclosed in the format required by the implementing technical standards adopted pursuant to Article 441 of Regulation (EU) No 575/2013 for centralisation purposes on the EBA website. The EBA will not disclose the ancillary data.

Title V- Final provisions and implementation

10. These Guidelines apply from [...].
11. The competent authorities should notify the EBA whether or not they and the relevant entities in their jurisdiction have complied with the disclosure requirements included in Title II.

Annex

Template

General Bank Data

Section 1 - General Information	Response
a. General information provided by the relevant supervisory authority:	
(1) Country code	
(2) Bank name	
(3) Reporting date (yyyy-mm-dd)	
(4) Reporting currency	
(5) Euro conversion rate	
(6) Submission date (yyyy-mm-dd)	
b. General Information provided by the reporting institution:	
(1) Reporting unit	
(2) Accounting standard	
(3) Date of public disclosure (yyyy-mm-dd)	
(4) Language of public disclosure	
(5) Web address of public disclosure	-

Size Indicator

Section 2 - Total Exposures	Amount
a. Counterparty exposure of derivatives contracts	
b. Gross value of securities financing transactions (SFTs)	
c. Counterparty exposure of SFTs	
d. Other assets	
(1) Securities received in SFTs that are recognised as assets	
e. Total on-balance-sheet items (sum of items 2.a, 2.b, 2.c, and 2.d, minus 2.d.(1))	
f. Potential future exposure of derivative contracts	
g. Notional amount of off-balance-sheet items with a 0% credit conversion factor	
(1) Unconditionally cancellable credit card commitments	
(2) Other unconditionally cancellable commitments	
h. Notional amount of off-balance-sheet items with a 20% credit conversion factor	
i. Notional amount of off-balance-sheet items with a 50% credit conversion factor	
j. Notional amount of off-balance-sheet items with a 100% credit conversion factor	



___ k. Total off-balance-sheet items (sum of items 2.f, 2.g, and 2.h through 2.j, minus 0.9 times the sum of items 2.g.(1) and 2.g.(2)) _____

l. Entities consolidated for accounting purposes but not for risk-based regulatory purposes:

(1) On-balance-sheet assets

(2) Potential future exposure of derivatives contracts

(3) Unconditionally cancellable commitments

(4) Other off-balance-sheet commitments

(5) Investment value in the consolidated entities

m. Regulatory adjustments

___ n. Total exposures indicator (sum of items 2.e, 2.k, 2.l.(1), 2.l.(2), 0.1 times 2.l.(3), 2.l.(4), minus the sum of items 2.l.(5) and 2.m) _____

Interconnectedness Indicators

Section 3 - Intra-Financial System Assets	Amount
a. Funds deposited with or lent to other financial institutions	
(1) Certificates of deposit	
b. Unused portion of committed lines extended to other financial institutions	
c. Holdings of securities issued by other financial institutions:	
(1) Secured debt securities	
(2) Senior unsecured debt securities	
(3) Subordinated debt securities	
(4) Commercial paper	
(5) Equity securities	
(6) Offsetting short positions in relation to the specific equity securities included in item 3.c.(5)	
d. Net positive current exposure of securities financing transactions with other financial institutions	
e. Over-the-counter derivatives with other financial institutions that have a net positive fair value:	
(1) Net positive fair value	
(2) Potential future exposure	
___ f. Intra-financial system assets indicator (sum of items 3.a, 3.b through 3.c.(5), 3.d, 3.e.(1), and 3.e.(2), minus 3.c.(6)) _____	

Section 4 - Intra-Financial System Liabilities	Amount
a. Deposits due to depository institutions	
b. Deposits due to non-depository financial institutions	
c. Unused portion of committed lines obtained from other financial institutions	
d. Net negative current exposure of securities financing transactions with other financial institutions	
e. Over-the-counter derivatives with other financial institutions that have a net	



negative fair value:

(1) Net negative fair value

(2) Potential future exposure

f. Intra-financial system liabilities indicator (sum of items 4.a through 4.e.(2))

Section 5 - Securities Outstanding

Amount

a. Secured debt securities

b. Senior unsecured debt securities

c. Subordinated debt securities

d. Commercial paper

e. Certificates of deposit

f. Common equity

g. Preferred shares and any other forms of subordinated funding not captured in item 5.c.

h. Securities outstanding indicator (sum of items 5.a through 5.g)

Substitutability/Financial Institution Infrastructure Indicators

Section 6 - Payments made in the reporting year (excluding intragroup payments)	Reported in	Amount specified currency	in Amount
a. Australian dollars	AUD		
b. Brazilian real	BRL		
c. Canadian dollars	CAD		
d. Swiss francs	CHF		
e. Chinese yuan	CNY		
f. Euros	EUR		
g. British pounds	GBP		
h. Hong Kong dollars	HKD		
i. Indian rupee	INR		
j. Japanese yen	JPY		
k. Swedish krona	SEK		
l. United States dollars	USD		
m. Payments activity indicator (sum of items 6.a through 6.l)			

Section 7 - Assets Under Custody

Amount

a. Assets under custody indicator

**Section 8 - Underwritten Transactions in Debt and Equity
Markets**

Amount

a. Equity underwriting activity



b. Debt underwriting activity

c. Underwriting activity indicator (sum of items 8.a and 8.b)

Complexity indicators

Section 9 - Notional Amount of Over-the-Counter (OTC)

Derivatives

Amount

a. OTC derivatives cleared through a central counterparty

b. OTC derivatives settled bilaterally

c. OTC derivatives indicator (sum of items 9.a and 9.b)

Section 10 - Trading and Available-for-Sale Securities

Amount

a. Held-for-trading securities (HFT)

b. Available-for-sale securities (AFS)

c. Trading and AFS securities that meet the definition of Level 1 assets

d. Trading and AFS securities that meet the definition of Level 2 assets, with haircuts

e. Trading and AFS securities indicator (sum of items 10.a and 10.b, minus the sum of 10.c and 10.d)

Section 11 - Level 3 Assets

Amount

a. Level 3 assets indicator (Assets valued using Level 3 measurement inputs)

Cross-Jurisdictional Activity Indicators

Section 12 - Cross-Jurisdictional Claims

Amount

a. Cross-jurisdictional claims indicator (Total foreign claims on an ultimate risk basis)

Section 13 - Cross-Jurisdictional Liabilities

Amount

a. Foreign liabilities (excluding derivatives and local liabilities in local currency)

(1) Any foreign liabilities to related offices included in item 13.a.

b. Local liabilities in local currency (excluding derivatives activity)

c. Cross-jurisdictional liabilities indicator (sum of items 13.a and 13.b, minus 13.a.(1))



Ancillary Data

Section 14 - Ancillary Indicators	Amount
a. Total liabilities	
b. Retail funding	
c. Wholesale funding dependence ratio (the difference between items 14.a and 14.b, divided by 14.a)	
d. Total gross revenue	
e. Total net revenue	
f. Foreign net revenue	
g. Gross value of cash lent and gross fair value of securities lent in SFTs	
h. Gross value of cash borrowed and gross fair value of securities borrowed in SFTs	
i. Gross positive fair value of over-the-counter (OTC) derivatives transactions	
j. Gross negative fair value of OTC derivatives transactions	
	Amount in single units
k. Number of jurisdictions	

Section 15 - Ancillary Items	Amount
a. Total exposures prior to regulatory adjustments (January 2014 definition)	
b. Total exposures for the calculation of the leverage ratio (January 2014 definition)	
c. Loans obtained from other financial institutions	
d. Certificates of deposit included in items 4.a and 4.b	
e. Held-to-maturity securities	
	in Amount
f. Payments made in the reporting year	Reported in Amount specified currency
(1) Mexican pesos	MXN
(2) New Zealand dollars	NZD
(3) Russian rubles	RUB

Memorandum Items

Section 16 - Size Items	Amount
a. Total assets under the regulatory scope of consolidation	
b. Total assets under the accounting scope of consolidation	
c. Total assets of insurance subsidiaries gross of intragroup exposures	

d. Total assets of insurance subsidiaries net of non-insurance intragroup exposures			
e. Total off-balance-sheet assets of insurance subsidiaries gross of intragroup exposures			
f. Total off-balance-sheet assets of insurance subsidiaries net of non-insurance intragroup exposures			
g. Total exposures including investments in insurance subs outside the regulatory scope of consolidation			
Section 17 - Interconnectedness Items			Amount
a. Book value of equities for which a market price is unavailable			
b. Certificates of mutual banks			
c. Minority interest			
Section 18 - Substitutability/Financial Infra. Items			
a. Payments made as a correspondent for other banks	Reported in	Amount specified currency	in Amount
(1) Australian dollars	AUD		
(2) Brazilian real	BRL		
(3) Canadian dollars	CAD		
(4) Swiss francs	CHF		
(5) Chinese yuan	CNY		
(6) Euros	EUR		
(7) British pounds	GBP		
(8) Hong Kong dollars	HKD		
(9) Indian rupee	INR		
(10) Japanese yen	JPY		
(11) Swedish krona	SEK		
(12) United States dollars	USD		
(13) Mexican pesos	MXN		
(14) New Zealand dollars	NZD		
(15) Russian rubles	RUB		
b. Trading volume of securities issued by sovereigns			
c. Trading volume of securities issued by other public sector entities			
d. Trading volume of other fixed income securities			
e. Trading volume of listed equities			
f. Trading volume of all other securities			
g. Initial margin posted to central counterparties (CCPs) on behalf of clients			
h. Initial margin posted to CCPs for the reporting group's own account			
i. Default fund contributions to CCPs			
j. Other facilities to CCPs			
k. Provision of settlement services in connection			



with centrally-cleared transactions

Section 19 - Cross-Jurisdictional Activity Items	Amount
a. Foreign derivative claims on an ultimate risk basis	
b. Foreign derivative liabilities (aggregation of BIS locational statistics)	
c. Foreign liabilities on an immediate risk basis (including derivatives)	
d. Foreign derivative liabilities on an immediate risk basis	
e. Foreign debt security liabilities on an immediate risk basis	

Annual Average Exchange Rates

Section 20 - Average Exchange Rates	Conversion rate
a. Australian dollars	AUD
b. Brazilian real	BRL
c. Canadian dollars	CAD
d. Swiss francs	CHF
e. Chinese yuan	CNY
f. Euros	EUR
g. British pounds	GBP
h. Hong Kong dollars	HKD
i. Indian rupee	INR
j. Japanese yen	JPY
k. Mexican pesos	MXN
l. New Zealand dollars	NZD
m. Russian rubles	RUB
n. Swedish krona	SEK
o. United States dollars	USD

Checks Summary

Section 21 - Indicator Values	Indicator value in reporting currency	Indicator value in million EUR
a. Section 2 - Total exposures indicator		
b. Section 3 - Intra-financial system assets indicator		
c. Section 4 - Intra-financial system liabilities indicator		
d. Section 5 - Securities outstanding indicator		



e. Section 6 - Payments activity indicator

f. Section 7 - Assets under custody indicator

g. Section 8 - Underwriting activity indicator

h. Section 9 - OTC derivatives indicator

i. Section 10 - Trading and AFS securities indicator

j. Section 11 - Level 3 assets indicator

k. Section 12 - Cross-jurisdictional claims indicator

l. Section 13 - Cross-jurisdictional liabilities indicator

m. Other Sections

(1) Item 1.a - General information provided by the supervisory authority

(2) Item 1.b - General Information provided by the reporting institution

(3) Section 14 - Ancillary Indicators

(4) Section 15 - Ancillary Items

(5) Section 16 - Size Items

(6) Section 17 - Interconnectedness Items

(7) Section 18 - Substitutability/Financial Infra. Items

(8) Section 19 - Cross-Jurisdictional Activity Items

(9) Section 20 - Average Exchange Rates

7. Accompanying documents

7.1 Cost-benefit analysis/impact assessment

The update of the data template did not involve any significant policy choices. Costs and benefits for institutions and other stakeholders remain the same as under the RTS, ITS and guidelines in their original versions.

It would not have been a viable option not to update the data template in the RTS and ITS, as this would not be in line with the legislative objective to take into account international agreed standards. In addition, it would result in making reporting more complicated and in doubling the administrative burden for institutions which take part in the identification process for G-SIBs at BCBS level and confusing information instead of enhanced transparency for the public.

At the same time the revised structure of the RTS and the guidelines helps streamlining the process for future updates and consequently significantly reduces administrative costs at level of the European authorities.