

Guidelines compliance table

EBA/GL/2017/05 Appendix 1

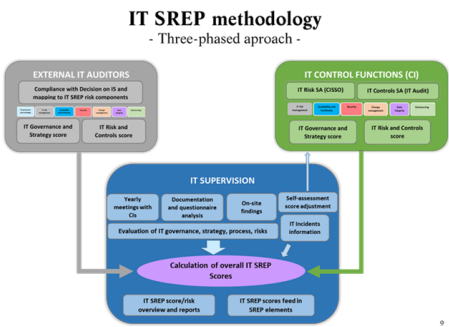
11 May 2017; Date of application – 01
January 2018 (Updated – 21
September 2022)

Guidelines on ICT Risk Assessment under the Supervisory Review and Evaluation process (SREP)

The following competent authorities* comply or intend to comply with the EBA's Guidelines on ICT Risk Assessment under SREP:

| Member State | Competent authority | Complies or intends to comply | Comments |
|--------------|---|-------------------------------|---|
| BE | National Bank of Belgium | Yes | As at 05.02.2019, notification date. As of January 2018, the National Bank of Belgium is compliant with the Guidelines on ICT Risk Assessment under the SREP (EBA/GL/2017/OS), in the sense that for every financial institution that undergoes a Supervisory Review and Evaluation Process, an ICT risk assessment is made according to these guidelines. The implementation for Significant Institutions is fully aligned with the ECB-SSM processes/instructions in this regard, and also for Less Significant Institutions the NBB intends to align its implementation to the finalized instructions of the ECB-SSM when available. |
| BG | Българска народна банка (Bulgarian National Bank) | Yes | As at 20.09.2019, notification date. In accordance with Article 74a of the Law on Credit Institutions banks shall apply the EBA guidelines, recommendations concerning them and for which the BNB has announced it shall comply with in |

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| | | | | <p>accordance with Article 79a, paragraph 1, item 2 of the same Law.</p> <p>The EBA/GL/2017/05 is part of the legal framework to the BNB Manual for the SREP (adopted by Decision Nr 279/14.11.2018 of the BNB Governing Council); Under the Manual, the supervisory assessment of bank's ICT risk is accomplished in the course of the assessment of the operational risk, as well as in the context of the risk management framework.</p> <p>The SREP Manual is available only in Bulgarian language.</p> |
| CZ | Czech Republic | Czech National Bank | Yes | As at 03.11.2017, notification date. |
| DK | Denmark | Finanstilsynet (FSA-DK) | Yes | Complies as of the date of the notification, 20.09.2022. The Danish FSA has been compliant with "EBA/GL/2017/05 – GLs on ICT Risk Assessment under the Supervisory Review Process (SREP)" since the "intention to comply" date (01.01.2020). For further information please refer to the peer review report by the Peer Review Committee. |
| DE | Germany | Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) | Yes | As at 01.01.2019, notification date. |
| EE | Estonia | Finantsinspektsioon | Yes | As at 01.11.2017 notification date |
| IE | Ireland | Central Bank of Ireland | Yes | As at 04.02.2019, notification date. |
| EL | Greece | Bank of Greece | Yes | Complies as of date of notification, 20/07/2022. Executive Committee Act 190/16.6.2021 Bank of Greece Circular 33/17.1.2022 |
| HR | Croatia | Hrvatska narodna banka (Croatian National Bank) | Yes | <p>As at 02.10.2010, notification date.</p> <p>In line with requirements stemming from EBA Guidelines on ICT Risk Assessment under SREP (EBA/GL/2017/05), CNB developed and implemented its own IT risk methodology under SREP. Methodology and CNB's approach were presented at EBA Workshop on IT risk supervision and cloud outsourcing (December 2017).</p> <p>IT risk assessment includes assessment of the institution's governance and strategy on ICT (feeds into the assessment of</p> |

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| | | | | <p>internal governance and institution-wide controls) and assessment of institutions' ICT risk exposures and controls (contributes to the assessment of Operational risk as a part of risks to capital). Information for the assessments is collected from multiple sources (external IT auditors, internal IT control and IT management functions of credit institutions etc.) and by using various techniques (questionnaires, self-assessments, reports, documents analysis and yearly meetings). A brief overview of the methodology is shown in the next diagram:-</p> <p>-</p> <div data-bbox="1034 913 1485 1238" data-label="Diagram">  <p>The diagram illustrates the IT SREP methodology as a three-phased approach. It starts with 'EXTERNAL IT AUDITORS' (compliance with decision on IT and mapping to IT SREP risk components) and 'IT CONTROL FUNCTIONS (CI)' (IT Risk SA (ICSD) and IT Controls SA (IT Audit)). Both feed into 'IT SUPERVISION', which includes yearly meetings with CIs, documentation and questionnaire analysis, on-site findings, self-assessment score adjustment, and IT incidents information. The final step is the 'Calculation of overall IT SREP Scores', which produces 'IT SREP scores/Risk overview and reports' and 'IT SREP scores Feed in SREP elements'.</p> </div> <p>-</p> <p>By using this methodology, in 2018, CNB performed IT risk assessment for SREP I (OSI), SREP II and SREP III categories of credit institutions. IT SREP scores were included into overall SREP scores.</p> <p>As at 28.01.2019, notification date. In line with requirements stemming from EBA Guidelines on ICT Risk Assessment under SREP (EBA/GL/2017/05), CNB developed and implemented its own IT risk methodology under SREP. Methodology and CNB's approach was presented at EBA Workshop on IT risk supervision and cloud outsourcing (December 2017.). IT risk assessment includes assessment of the institution's governance and strategy on ICT (feeds into the assessment of internal governance and institution-wide controls) and assessment of institution's ICT risk exposures and controls (contributes to the assessment of Operational risk as a part</p> |

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| | | | | of risks to capital). Information for the assessments is collected from multiple sources (external IT auditors, internal IT control and IT management functions of credit institutions etc.) and by using various techniques (questionnaires, self-assessments, reports, documents analysis and yearly meetings). By using this methodology, in 2018, CNB did IT risk assessment for SREP I (OSI), SREP II and SREP III categories of credit institutions. IT SREP scores were included into overall SREP scores. |
| ES | Spain | Banco de España | Yes | As at 07.02.2019, notification date. |
| FR | France | Autorité de Contrôle Prudentiel et de Résolution (ACPR) | Yes | As at 21.02.2019, notification date. ACPR has complied through an internal document. |
| IT | Italy | Banca d'Italia | Yes | As at 03.05.2019, notification date. |
| CY | Cyprus | Central Bank of Cyprus | Yes | As at 22.04.2019, notification date. |
| LV | Latvia | Financial and Capital Market Commission | Yes | As at 01.02.2019, notification date. EBA Guidelines are directly applicable by the FCMC during the SREP Assessment process. |
| LT | Lithuania | Bank of Lithuania | Yes | As at 04.02.2019, notification date. Compliance with GL approved by the Supervision Services Decision no 241-33. |
| LU | Luxembourg | Commission de Surveillance du Secteur Financier (CSSF) | Yes | As at 05.02.2019, notification date. |
| HU | Hungary | The Central Bank of Hungary | Yes | As at 22.02.2019, notification date. Implementing document: ICAAP-ILAAP-BMA Methodological Handbook of the MNB (https://www.mnb.hu/felugyelet/szabalyozas/felugyeleti-szabalyozo-eszkozok/modszertani-kezikonyvek/icaap-ilaap-bma-felugyeleti-felulvizsgalatok). |
| MT | Malta | Malta Financial Services Authority | Yes | As at 04.02.2019, notification date. |
| NL | Netherlands | De Nederlandsche Bank | Yes | As at 10.11.2017, notification date. |
| AT | Austria | Austrian Financial Market Authority | Yes | As at 07.11.2017, notification date |

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|----|----------------|-----------------------------|--------------------------------------|--|
| PL | Poland | Komisja Nadzoru Finansowego | Yes | As at 15.02.2019, notification date. |
| PT | Portugal | Banco de Portugal | Yes | As at 05.02.2019, notification date. |
| RO | Romania | National Bank of Romania | Yes | As at 10.11.2017, notification date. |
| SI | Slovenia | Bank of Slovenia | Yes | As at 01.01.2018, notification date. https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina/2017-01-3103?so=2017-01-3103 |
| SK | Slovakia | Národná Banka Slovenska | Yes | Complies as of the date of the notification, 15.07.2022. EBA GL is already fully implemented in NBS supervisory processes. |
| FI | Finland | Finanssivalvonta (FIN-FSA) | Yes | As at 15.02.2018, notification date. |
| SE | Sweden | Finansinspektionen | Yes | As at 30.01.2019, notification date. |
| UK | United Kingdom | PRA | Yes | As at 05.03.2018, notification date. |
| | | Financial Conduct Authority | Yes | As at 09.02.2019, notification date. |

EU Institutions – Agencies

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|-----|-----|-----|------------|--------------------------------------|
| ECB | ECB | ECB | Yes | As at 05.02.2019, notification date. |
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EEA – EFTA State

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|----|---------------|--|------------|--------------------------------------|
| IS | Iceland | Financial Supervisory Authority, Iceland | Yes | As at 10.11.2017, notification date |
| LI | Liechtenstein | Financial Market Authority Liechtenstein (FMA) | Yes | As at 10.11.2017, notification date |
| NO | Norway | The Financial Supervisory Authority of Norway | Yes | As at 04.02.2019, notification date. |

European Territories under Article 355(3) TFEU

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|----|----------------|---|------------|--------------------------------------|
| UK | United Kingdom | Gibraltar Financial Services Commission | Yes | As at 04.02.2019, notification date. |
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*The EEA States other than the Member States of the European Union are not currently required to notify their compliance with the EBA’s Guidelines. This table is based on information provided from those EEA States on a voluntary basis.

** Please note that, in the interest of transparency, if a competent authority continues to intend to comply after the application date, it will be considered “non-compliant” unless (A) the Guidelines relate to a type of institution or instruments which do not currently exist in the jurisdiction concerned; or (B) legislative or regulatory proceedings have been initiated to bring any national measures necessary to comply with the Guidelines in force in the jurisdiction concerned.

Notes

Article 16(3) of the EBA’s Regulations requires national competent authorities to inform us whether they comply or intend to comply with each Guideline or recommendation we issue. If a competent authority does not comply or does not intend to comply it must inform us of the reasons. We decide on a case by case basis whether to publish reasons.

The EBA endeavour to ensure the accuracy of this document, however, the information is provided by the competent authorities and, as such, the EBA cannot accept responsibility for its contents or any reliance placed on it.

For further information on the current position of any competent authority, please contact that competent authority. Contact details can be obtained from the EBA’s website www.eba.europa.eu.