



**Single
Rulebook
Q&A**

Question ID	2020_5577
Status	Final Q&A
Legal act	Regulation (EU) No 575/2013 (CRR)
Topic	Supervisory reporting - FINREP (incl. FB&NPE)
Article	99
Paragraph	-
Subparagraph	-
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	Regulation (EU) No 680/2014 - ITS on supervisory reporting of institutions (as amended)
Article/Paragraph	-
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Disclose name of institution / entity	No
Type of submitter	Competent authority
Subject matter	FINREP - F 01.01 and F 18.00.
Question	<p>Should a supervised entity report past due fees (e.g., due to guarantees provided or management fees) as “Other Assets” (F 01.01, row 360) or as “loans and advances” (F 01.01, Row 183)?</p> <p>According to CRR - Article 178(1)(b) when the obligor is past due more for than 90 days on any material credit obligation to the institution [...] it shall be considered to have occurred a default.</p> <p>However, the scope of F 18.00 (Information on performing and non-performing exposures) does not include “Other Assets”, making it impossible</p>

	<p>to consider the fees that are past due for more than 90 days as non-performing.</p> <p>Therefore, we ask if it was the intention of the regulator to not include “Other Assets” in the scope of F 18.00.? If so, should these fees be considered as “loans and advances” (F 01.01, Row 183)?</p>
Background on the question	<p>We have supervised entities considering past due fees as “Other Assets” (F 01.01, row 360). Although these fees are past due, because they are not considered as “Loans and Advances”, and therefore not registered on F 18.00, when they are past due for more than 90 days they are not being included in the NPE ratio.</p>
EBA answer	<p>Exposures stemming from fees related to financial services do not meet the definition given of “Other assets” in Part 2, paragraph 1.1.5 of annex V to Regulation (EU) No 680/2014 (ITS on supervisory reporting).</p> <p>Therefore, the exposures related to the fees mentioned in the question are financial assets and shall be reported in F 01.01, row 183 “Loans and advances” and in F 18.00, rows “Loans and advances”.</p>
Link	<p>https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2020_5577</p>

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