

# Single Rulebook Q&A

<b>Question ID</b>	2022_6536
<b>Status</b>	Final Q&A
<b>Legal act</b>	Regulation (EU) No 575/2013 (CRR)
<b>Topic</b>	Transparency and Pillar 3
<b>Article</b>	449a
<b>Paragraph</b>	-
<b>Subparagraph</b>	-
<b>COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations</b>	Regulation (EU) 2022/2453 - ITS on ESG disclosures
<b>Article/Paragraph</b>	n.a.
<b>Date of submission</b>	28/07/2022
<b>Published as Final Q&amp;A</b>	17/02/2023
<b>Disclose name of institution / entity</b>	No
<b>Type of submitter</b>	Industry association
<b>Subject matter</b>	ITS ESG P3 - Template 4 - Top 20 emitting companies aggregation
<b>Question</b>	Should reported exposures to top 20 most emitting companies be reported at a group or individual company level?
<b>Background on the question</b>	According to Annex II, Institutions shall disclose in this template aggregate information on exposures towards the most carbon intensive counterparties in the world. They shall include aggregated and anonymised information on the gross carrying amount of exposures towards up to 20 counterparties of the institution that are among the top 20 most carbon-intensive corporates worldwide. However it is not clear whether exposures to top 20 most emitting companies should be reported at a group or individual company level.
<b>Final answer</b>	Institutions shall disclose data for template 4 in Annex 1 of Implementing Regulation (EU) 2022/2453 of 30 November 2022 on the basis of the scope of their prudential consolidation(determined in accordance with Regulation (EU) No 575/2013, Title II, Chapter 2, Section 2. Preparers of the disclosure

	<p>shall include information on exposures towards 20 top emitting companies that are counterparties to any entities part the group, as well as towards any entity that belongs to the group of any of the 20 top emitters. If more than one institutions in the group have exposures towards the same company in the top 20 emitters group, the disclosure should include the total amount of all the exposures at group level. Moreover, preparers of the disclosures are encouraged to disclose in the accompanying narrative qualitative information of their methodology, in any case, including if their chosen methodology departs, also partially, from the instructions. In this case they shall explain the reasons behind their choices and how it affects the quality of the information provided.</p>
<b>Link</b>	<a href="https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2022_6536">https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2022_6536</a>

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