

<b>Question ID</b>	2023_6681
<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.
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<b>Disclose name of institution / entity</b>	No
<b>Type of submitter</b>	Other
<b>Subject matter</b>	ESG P3 - Template 7 Decision tree KPI GAR for Financial Corporation
<b>Question</b>	In which row/group of rows from template 7 should be disclosed Financial Corporation located outside European Union (EU) and Financial Corporation located in EU but not subject to NFRD disclosures?
<b>Background on the question</b>	Both commission implementing regulation (EU) 2022/2453 and Delegated Regulation (EU) 2021/2178 don't provide enough detailed instructions to clearly derive, without room for interpretation, where to disclose all "categories" of Financial Corporation. We know EBA is relying on Delegated Regulation (EU) 2021/2178 but if you could clarify it will be helpful and it will enable to disclose an accurate GAR and it will avoid different interpretations between institutions.
<b>Final answer</b>	According to article 7.3 of regulation 2021-2178, exposures to undertakings that are not obliged to publish non-financial information pursuant to Article 19a or 29a of Directive 2013/34/EU shall be excluded from the numerator of key performance indicators of financial undertakings.  Template 1 "Assets for the calculation of the GAR" in appendix VI of

	<p>regulation 2021/2178 and template 7 of regulation 2022/453 (ITS Pillar 3 ESG disclosures) do not foresee a specific line to report exposures toward financial corporations that are not subject to Article 19a or 29a of Directive 2013/34/EU.</p> <p>As a consequence, in row 44 of template 7 Other assets (e.g. Goodwill, commodities etc.) institutions should report exposures that are excluded from the numerator of the GAR but covered in the denominator, such as exposures to non-EU financial corporations and EU financial corporations that are not subject to NFRD disclosure obligations.</p>
<b>Link</b>	<a href="https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2023_6681">https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2023_6681</a>

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