

Single Rulebook Q&A

Question ID	2013_147
Status	Final Q&A
Legal act	Regulation (EU) No 575/2013 (CRR)
Topic	Supervisory reporting - FINREP (incl. FB&NPE)
Article	99
Paragraph	2
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	ITS - Chapter 9, Article 18 (3)
Date of submission	09/08/2013
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Disclose name of institution / entity	No
Type of submitter	Credit institution
Subject matter	FINREP Reporting for firms with Accounting Reference Date other than 31 December
Question	<p>Article 18 (3) confirms that FINREP applies from 1 July 2014. We have a financial year end of 30 September which means that where we will report our first quarter's data for relevant templates (in full) as at 30 September 2014. For semi-annual templates should we only report a quarter's data in our first submission (1 July to end September) or should we start collecting data from 1 October, and report a full 6 months of data as at 31 March 2015? For annual templates should we only report a quarter's data in our first submission (1 July to end September) or should we start collecting data from 1 October, and report a full year's data as at 31 March 2015? The period 1 July 2014 to 30 September 2014 is a full quarter, so this will allow us to report a full quarter's data.</p>
Background on the question	Firms are allowed to report FINREP in line with their financial year end, where this does not align with 31 December.
EBA answer	<p>Institutions with an accounting year ending 31 December:</p> <p>Article 19. paragraph 38(3) of the Regulation (EU) No 680/2014 13 ITS on</p>

~~supervisory reporting of institutions (ITS) Draft ITS on Supervisory reporting~~ envisages an entry into force of the reporting of financial information for 1 July 2014. Even if the provisions for reporting FINREP shall apply from 1 July 2014, institutions with an accounting year ending 31 December shall report flow data (e.g. P&L) at the first quarterly reporting reference date (30 Sept 2014) cumulatively from 1 Jan 2014 to 30 Sept 2014 and not from 1 July 2014 to 30 Sept 2014.

In the same way, for 31 Dec 2014 these institutions shall submit all of the templates with quarterly, semi-annual and annual frequencies and shall report (flow) data cumulatively from 1 Jan 2014 to 31 Dec 2014 and not from 1 July 2014 to 31 Dec 2014.

Institutions with an accounting year which does not coincide with the calendar year:

According to article 2(3) of the ~~Draft ITS~~, where reporting institutions are permitted by national laws to report their financial information based on their accounting year end which does not coincide with the calendar year may adjust their reporting reference dates accordingly.

In the case of a reporting institution with an accounting year ending 30 September, it implies that for 30 Sept 2014, those institutions shall submit all of the templates with quarterly, semi-annual and annual frequencies, and the templates would cover the period between 1 October 2013 and 30 Sept 2014, which means that the institutions shall report (flow) data cumulatively from 1 October 2013 and 30 Sept 2014 and not from 1 July 2014 to 30 Sept 2014.

Institutions should discuss with their supervisors how to proceed for overcoming the issues that might arise in the reporting the complete flow amounts in the first remittances of the templates.

**As of 1/8/2014 the content of this answer was modified to reflect the publication of the final ITS on supervisory reporting of institutions in the Official Journal of the European Union. As a result, the references to the ITS were updated and the disclaimer deleted. For reasons of transparency, revisions are highlighted in track changes.*

Link

https://www.eba.europa.eu/single-rule-book-qa/-/qna/view/publicId/2013_147

European Banking Authority, 25/01/2022

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