

<b>Question ID</b>	2013_347
<b>Status</b>	Final Q&A
<b>Legal act</b>	Regulation (EU) No 575/2013 (CRR)
<b>Topic</b>	Supervisory reporting - COREP (incl. IP Losses)
<b>Article</b>	99
<b>Paragraph</b>	-
<b>Subparagraph</b>	-
<b>COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations</b>	Regulation (EU) No 680/2014 - ITS on supervisory reporting of institutions (as amended)
<b>Article/Paragraph</b>	Annex I, C09.01 (column 040-070)
<b>Date of submission</b>	07/10/2013
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<b>Disclose name of institution / entity</b>	Yes
<b>Name of institution / submitter</b>	Swedish Bankers' Association
<b>Country of incorporation / residence</b>	Sweden
<b>Type of submitter</b>	Industry association
<b>Subject matter</b>	Distribution in columns 040-070 in Geographical Breakdown
<b>Question</b>	Are the columns 040-070 memorandum items in the same way (the figure should be reported where the obligors would have been reported if those exposures were not in assigned to "in default") that column 020 is?
<b>Background on the question</b>	Row 100 "Exposures in default" are grey marked and therefore not possible to fill in. The requested information in column 040-070 is in addition mostly referable to defaulted exposures. Column 020 has a clarification in Annex II that it is a memorandum item and that the exposures should be reported in the exposure classes they would have been assigned to if not in default. This information does not exist for columns 040-070. It is logical to assume that columns 040-070 should be treated in the same way as column 020 based on way the template is designed, even if this is not written in the instruction.
<b>Final answer</b>	The concept of columns 020, 040 and 070 in C 09.01 is different from the

concept of columns 050 to 060. This is also reflected in the DPM (table C 09.01 b in the DPM).

- Column **020** is a memorandum item, because it shows the composition of the exposure class "in default", i.e. defaulted exposures are reported in the exposure class the exposure was assigned to before the default occurred.
- Columns **040 and 070** are connected directly to column 020, because they refer explicitly to "new defaults".
- In contrast, in columns **050 to 060** general and specific credit risk adjustments to the original exposure pre conversion factors are reported, independent of whether it is a defaulted exposure or a non-defaulted exposure (see also EBA technical standard on specification of the calculation of specific and general credit risk adjustments in accordance with Article 110(4) of CRR for details). Due to the fact that those risk adjustments have to be considered in the process of calculating the total risk exposure amount in the standardised approach (if they fulfil the requirements in Article 110 of CRR), columns 050 to 060 are of the same concept as columns 010, 075, 080 and 090.

To represent correctly the different concepts, the grey shading of cells 100/050 to 100/060 will be deleted in the next revision of the ITS on Supervisory Reporting.

**Link**

[https://www.eba.europa.eu/single-rule-book-qa/-/qna/view/publicId/2013\\_347](https://www.eba.europa.eu/single-rule-book-qa/-/qna/view/publicId/2013_347)

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