ANNUAL REPORT – PART I

YEAR 2024

EBA/REP/2025/17 MAY 2025

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Board of Supervisors analysis and assessment

The EBA Board of Supervisors (BoS) takes note of the Annual Report 2024, submitted by the Executive Director ('Authorising Officer') in accordance with Article 48 of the Financial Regulation applicable to the EBA.

Analysing and assessing the Annual Report 2024, the BoS has made the following observations.

This report contains a comprehensive account of the activities carried out by the EBA in the implementation of its mandate and work programme during 2024. The EBA has met its obligations under Article 48, providing a detailed account of the results achieved in relation to the objectives set in the work programme for 2024, and financial and management information.

The BoS takes note of the reports of the European Court of Auditors and the Internal Audit Service, and of the EBA's response to these reports.

The BoS notes that the Executive Director has no reservations or critical issues to report that would affect the presentation of the annual accounts for the financial year 2024 to the discharge authority.

Paris, 20 May 2025

José Manuel Campa

Chair of the Board of Supervisors

Executive Summary

The European Banking Authority's (EBA) achievements in 2024 demonstrated its dedication to enhancing the stability and resilience of the EU's banking sector. The EBA completed 93% of the tasks outlined in its 2024 Work Programme, highlighting its unwavering commitment to its regulatory responsibilities.

In 2024, the EBA achieved significant progress in implementing the Basel III reforms within the EU, aiming to ensure banks' resilience in future crises and strengthen the financial system. The EBA focused on enhancing the Single Rulebook by issuing guidelines and technical standards on key banking topics such as credit, market and operational risk. The EBA also contributed to the European Green Deal through progress in sustainable finance integration, issuing guidelines and reports on ESG risks, greenwashing and scenario analysis, reflecting its commitment to embedding environmental and social considerations into prudential frameworks. The authority also addressed proportionality by focusing on minimising regulatory burdens on smaller banks while maintaining prudential objectives, and progressed mandates under investment firm regulations (IFR/IFD). In reinforcing the Single Rulebook, the EBA addressed capital instruments and regulatory stacking through reports and updated guidelines, including on CET1, TLAC/MREL, and liquidity standards. It assessed elements such as the net stable funding ratio (NSFR), concluding that no significant legislative changes were needed. Pillar 2 work included analysing interest rate risk impacts and updating supervisory review guidelines (SREP), while benchmarking activities continued across credit and market risk. In governance, joint European Supervisory Authorities (ESAs) guidelines improved cross-sector communication on fit and proper assessments. The EBA also tackled remuneration policies, publishing reports on gender neutrality and high earners, and began annual monitoring of non-EU banks' market share and foreign currency exposures, enhancing transparency and understanding of risk across the EU banking sector.

The EBA has focused on monitoring financial stability amid high interest rates, slow growth and geopolitical uncertainty, with a particular emphasis on the impact on the banking sector. In 2024, the EBA published two issues of its Risk Assessment Report, one in spring and one in autumn, and it accompanied the latter with the publication of the results of the EU-wide transparency exercise. The EBA also updated its stress-testing methodology, incorporating new elements such as net fee and commission income (NFCI) projections and market risk sensitivity. Additionally, the EBA conducted a one-off climate risk stress test to assess the resilience of the financial sector under Fit-for-55 package scenarios, showing a limited impact from transition risks but potential disruption when combined with macroeconomic factors. The EBA is also working to gradually integrate climate risks into the EU-wide stress-testing framework. Starting in 2027, it will use a combined approach that assesses both capital adequacy and business model resilience, while ensuring alignment with existing stress test methodologies.

In 2024, the EBA continued advancing its data strategy to enhance the acquisition, use and dissemination of regulatory data through its EUCLID platform, enabling better data flows and access to high-quality insights. The EBA provided stakeholders with tools for visualising and comparing key financial data from over 9 500 data points across 123 banks, helping increase transparency and market discipline. It also supported data-driven analyses and responded to calls for advice on EU banks' funding and exposures. The EBA began adapting EUCLID to accommodate new types of reporting entities, such as those involved in MiCA and Digital Operational Resilience

Act (DORA) regulations. The EBA also made progress in implementing the Pillar 3 data hub and worked on enhancing integrated reporting, including a governance structure and improvements to the Data Point Model (DPM 2.0) for better reporting efficiency. The EBA also introduced new tools to ensure better data quality and consistency, aligning with ongoing efforts on supervisory disclosure and transparency in EU banking regulations.

In 2024, the ESAs intensified their efforts to implement DORA, preparing for the framework's full application starting in 2025. Key activities included advancing oversight over critical ICT third-party providers (CTPPs) by establishing governance structures and developing methodologies for oversight tasks. The ESAs also launched training programmes for staff and financial entities to build the necessary capabilities. In line with the EU's systemic cyber risk mitigation, the ESAs introduced the EU Systemic Cyber Incident Coordination Framework (EU-SCICF) to enhance coordination between financial authorities and mitigate cyber risks to financial stability. A joint ESA statement was also published in December 2024, guiding financial entities on the new requirements, particularly regarding the reporting of ICT incidents and third-party providers.

The Markets in Crypto-Assets Regulation (MiCA) came into force in 2023, with full application starting in 2024. In 2024, the EBA delivered 20 technical standards and guidelines to enhance consumer protection, governance and prudential resilience for crypto-asset markets. The EBA also developed a framework for supervising significant asset-referenced tokens (ARTs) and electronic money tokens (EMTs), including tools for information exchange and templates for supervisory procedures. The Crypto-Assets Standing Committee (CASC) replaced the temporary Crypto Supervision Coordination Group (CSCG) to help with knowledge-sharing and supervisory convergence. In addition, the EBA issued statements to remind issuers and consumers of the new MiCA requirements, highlighting key topics for supervisory attention and reinforcing the regulatory framework's consistent application across the EU. The EBA also completed preparatory actions for its other MiCA responsibilities, including providing non-binding opinions on crypto-asset classifications and exercising temporary intervention powers.

In 2024, the EBA strengthened its focus on innovation, consumer protection and the transition to a new anti-money laundering and countering the financing of terrorism (AML/CFT) framework. The EBA monitored emerging financial technologies, including decentralised finance, artificial intelligence (AI)/machine learning applications and crypto-assets, while also assessing their associated risks, such as operational and consumer protection issues. It published reports on tokenised deposits, decentralised finance (DeFi), and the impact of AI on the banking sector, as well as providing guidance on regulatory consistency in digital finance. Additionally, the EBA prioritised consumer protection through its monitoring of non-bank lenders and complaints handling, and took steps to ensure fair access to financial services. The EBA led efforts to standardise AML/CFT practices, tackle emerging financial crime risks, and coordinated with national authorities on implementing new regulatory measures. It also began preparations for the transition to the new EU AML/CFT framework, contributing to the creation of the new European Anti-Money Laundering Authority (AMLA), set to take over AML responsibilities by 2025.

Foreword by the Chairperson

As I look back on 2024, I reflect on a year in which, amid a shifting landscape, following the European Parliament elections, a new EU Commission and the ongoing shifts in the global landscape, the EBA has once again proven its adaptability in navigating evolving challenges.

The Draghi report and the reinforced emphasis on developing our single market underscore our commitment to fostering a financially stable environment that supports sustainable economic growth.

Last year signalled the start of my second mandate as Chairperson of the EBA. As we come up to 15 years of the EBA's unwavering dedication to safeguarding the EU banking sector, we must remember what we have built: a robust banking system. We need to ensure it remains that way. This includes planning for the future, adapting to new opportunities arising from technology and rising to new challenges to ensure the future growth of our economies.

In particular, we should address the impacts of climate change. The publication of the first-ever climate stress test of the EU financial sector under the implementation of the Fit-for-55 strategy symbolises our proactive stance to integrating ESG into financial oversight, paving the way for a sustainable future.

We recognise the need for regulations that are strong but also agile and fit for purpose, to support financial stability and the adequate provision of credit to finance our economies. In this context, we want to ensure that regulatory efficiency and simplification where possible should drive the implementation of the regulations. The ongoing work of implementing the new Basel framework is a true testament to such efforts.

The collaborative efforts among the European Supervisory Authorities, exemplified by our joint oversight under DORA, have set the regulatory framework for operational resilience and the basis for oversight of critical third-party providers. In addition, our work has helped the adoption of MiCA, a comprehensive and ambitious framework for the regulation and supervision of crypto-assets.

All these achievements highlight the tangible results of collaboration despite the uncertainties that surround us. We have leveraged our collective expertise to steer the banking sector towards innovation while keeping to our common mantra of a stable banking system.

As we look forwards, we need to continue to assess what is working, what is not, and what is left to do. We should aspire to extract of the benefits of a true single market, moving beyond mere regulation towards the goal of a comprehensive Banking Union, and allocating our citizens' savings into the financing of our future in the most efficient way possible.

None of these achievements would have been possible without the dedication of our over 250 members of staff or the unwavering support of our stakeholders – the EU Commission, the Council of the EU, the Banking Stakeholder Group (BSG), and our sister ESAs, the ESMA and EIOPA.

As we embark on a new cycle, using the momentum of past successes, I am confident that the EBA will continue to rise to the challenge, embrace innovation, and uphold our commitment to a resilient EU banking sector.

As we walk the talk, we should do it step by step, in our daily work, to build a coherent framework. But we should have no doubts about our final destination – a more integrated EU and single market for financial services. We will continue to do this together, with the support of our stakeholders, competent authorities and other European institutions – one step at a time.

Interview with the Executive Director

You arrived at the EBA at the height of the COVID-19 pandemic in 2020 and you have witnessed other important challenging situations. What would you make of your first mandate as it comes to an end?

Time flies. On the one hand, I have a hard time realising that I have been in my role for almost five years already, but, on the other hand, it has been very full years! In this regard, 2024 can be seen as a key milestone in our efforts to consolidate the EBA and prepare it for its future challenges.

A priority was of course to deliver our work programme and to support our staff in their missions. Which we did. The average execution rate of our work programme is 94% over the past four years. This was achieved despite challenging circumstances: Covid, Ukraine, inflation, and market and geopolitical shocks and turbulence called for new analyses, new requests, and evolving regulatory and risk assessment responses. Key enablers were staff talent and motivation, but also the thorough planning and controlling environment that we have built to support better prioritisation and resource allocation.

Since 2020, we have gradually adjusted our organisation. A first series of changes happened in 2021, with a stronger legal and compliance function, a data department, units dedicated to AML, Digital Finance, ESG and Reporting, and a new role of team leader to steer work on cross-cutting issues. In 2022 we created a shared accounting office with ESMA and revisited our approaches to third country equivalence and to Q&A. Since 2023, we have been working on MiCA and DORA preparations, which led to a new DORA Joint Oversight directorate between the three ESAs launched in 2024. During the entire period, we have consistently streamlined the number of our activities (from 37 in 2020 to 19 since 2023) and reduced the share of administrative support and coordination relative to business resources (it is now around 12–13%).

In fact, the entire organisational set-up of the EBA has been strengthened. Let me mention a few examples. Since 2022, the Human Resources approach has been entirely revisited. As culture is important, we formalised EBA's values in 2023, and we promote equal chances, especially gender equality. A multi-annual IT strategy was delivered by the end of last year, including a move to cloud, the rolling out of collaboration tools, investments in IT security, a new website and a new visual identity. A tight management of our budget and expenses allowed us to absorb the impact of inflationary tensions on expenses in 2023 and 2024. We introduced an Enterprise Risk Management system in 2022 and strengthened our internal IT and Data management. In the context of our commitment to the green deal, the EBA obtained environmental certification in 2022 which has been renewed annually since then. Last year, we refurbished the offices to adjust to our new working model and accommodate new staff for DORA and MiCA.

It sounds like you have pushed for innovation during your first mandate. Is this the approach looking forward? To rely more on innovative approaches?

I just mentioned that we recently formalised the EBA's values. Those are: public service, excellence, trust, creativity and collaboration. As you can see, they provide a strong foundation for developing innovative approaches. Which is something we need if we are to be effective and efficient in our missions.

A strong organisation is important, but we are a relatively small agency by design, and we are expected to closely collaborate with our members and partners in a flexible, agile and creative manner. It is with this spirit that we have approached our evolving tasks. For DORA and MiCA, we have set up intense interdepartmental coordination and massively redeployed staff on a temporary basis. Throughout 2024, I co-chaired with a BoS member the first EBA Coordination group, which was set up to facilitate the preparations for crypto-asset supervision ahead of MiCA application, and we agreed a common reporting platform to simplify the burden on entities and supervisors. For DORA, which gave similar responsibilities to the three ESAs, we have sponsored the idea of a joint oversight venture. This was endorsed early 2024, and we could organise the first joint recruitment and agree a target operating model before DORA applied. Last but not least, we agreed a pragmatic approach with the Commission for the transition to AMLA.

Now, the EBA is entering a new cycle of its existence and needs to deal with at least three main challenges. Firstly, new legislation is entering into force and impacting our roles – CRD/CRR, IFD/IFR, AML, DORA, MiCA, EMIR, with others reaching the final stages of negotiations. Secondly, the outlook for financial risks and vulnerabilities has shifted and this affects both the financial sector and the EBA itself, due to a changing geopolitical context and increasing economic imbalances, as well as to the transformations at play in the financial sector. Thirdly, EU legislators have announced new priorities, including a European Savings and Investment Union for market and banking, unlocking bank financing, working on non-bank financial intermediation, making a success of the green and digital transitions, and reducing the administrative and reporting burden.

All this in a context where resources granted by the EU legislators will remain scarce. Against that background, we will need to keep our innovative mindset to perform our missions in a way that benefits all stakeholders – financial institutions, regulators and, most importantly, European citizens!

Establishing a solid HR strategy is crucial for organisational success. How has your approach to talent management supported the EBA's achievements, and what lies ahead in this area?

Fundamentally, the EBA is its people. Without a skilled, motivated and adaptable workforce, none of the achievements I have mentioned so far would have been possible.

One of the biggest steps we have taken was the development and implementation of the Horizon 2029 HR Talent Strategy. We have been preparing for this since mid-2022 and moved into full implementation in 2024. The first results are already encouraging, as illustrated by staff satisfaction, which rose from 64% in 2020 to 72% in 2024. We want to set the foundations for a long-term approach to talent management that is built on versatility, mobility, career development and a trust-based work environment.

A major part of this effort has been to foster internal and external mobility. We want to ensure that staff have the opportunity to grow, take on new challenges, and bring fresh perspectives to their roles. Our staff members, in turn, provide their expertise to other EU agencies. This has led us to think outside the box when it comes to career progression, allowing employees to explore different functions within the EBA and beyond, including through personnel swap arrangements with other organisations.

A significant initiative launched in 2024 was also the 'Living the EBA Values' campaign. This helped reinforce and embed our core values into daily work. Our goal is that the EBA is a place where people are inspired to do their best work.

The EBA's ability to fulfil its mission depends on having a workforce that is not only highly skilled but also deeply committed to the institution's goals. We will focus on further strengthening talent development and leveraging new technologies to maintain a workplace culture that reflects our core principles and that will allow us to meet the challenges of today and tomorrow.

Abbreviations and acronyms

ACP Advisory Committee on Proportionality
AFM available financial means
AML/CFT anti-money laundering and countering the financing of terrorism
AMLA Anti-Money Laundering Authority
AMLR Anti-Money Laundering Regulation
ART asset-referenced token
AT1 Additional Tier 1
BCBS Basel Committee on Banking Supervision
BM Basel III Monitoring
BoS Board of Supervisors (BoS)
BRRD Bank Recovery and Resolution Directive
BSG Banking Stakeholder Group
CA competent authority
CASC Crypto-Assets Standing Committee
CASP crypto-asset service provider
CCR counterparty credit risk
CET1 Common Equity Tier 1
CfA Call for Advice
CMDI Crisis management and deposit insurance
CP Consultation Paper
CRD Capital Requirements Directive
CRR Capital Requirements Regulation
CSCG Crypto Supervision Coordination Group
CSD Credit Servicers Directive
CTPP ICT third-party service provider designated as critical
CVA credit valuation adjustment
CWA creditworthiness assessment
DeFi decentralised finance
DGS deposit guarantee scheme
DGSD Deposit Guarantee Schemes Directive
DLT Distributed ledger technology
DoD Definition of default
DORA Digital Operational Resilience Act
DPM Data Point Model
EBA European Banking Authority
EC European Commission
ECA European Court of Auditors
EDAP EBA Data Access Portal
ECB European Central Bank
EEA European Economic Area
EFIF European Forum for Innovation Facilitators
EFRAG European Financial Reporting Advisory Group
EIOPA European Insurance and Occupational Pensions Authority
EMAS European Financial Reporting Advisory Group
EMIR European Market Infrastructure Regulation
EMT electronic money token
EREP European Resolution Examination Programme
ERA Economic and Risk Analysis
ESAP European single access point
ESA European supervisory authority
ESCB European System of Central Banks
ESEP European Supervisory Examination Programme
ESG environmental, social and governance
ESMA European Securities and Markets Authority
ESRB European Systemic Risk Board
EU/EEA European Union / European Economic Area
EUCLID European Centralised Infrastructure for Supervisory Data
EuReCA EBA central database on anti-money laundering and countering the financing of terrorism
EU-SCICF EU Systemic Cyber Incident Coordination Framework

FIDA Financial Data Access Regulation
FINREP Financial Reporting
FRTB fundamental review of the trading book
GL guidelines
IAS Internal Audit Services
ICT information and communication technology
IFD Investment Firms Directive
IFR Investment Firms Regulation
IMA internal models approach
IPR Instant Payments Regulation
IRB internal ratings based
IRRBB interest rate risk in the banking book
IT information technology
ITS implementing technical standard
JBRC Joint Bank Reporting Committee
JC Joint Committee
LCR liquidity coverage ratio
LILLAC Liquidity Leverage Loss Absorbency and Capital Unit
MCD Mortgage Credit Directive
MDM Master Data Management
MiCA Markets in Crypto-Assets Regulation
MiFIR Markets in Financial Instruments Regulation
ML/TF money laundering/terrorist financing
MCD Mortgage Credit Directive
MREL minimum requirement for own funds and eligible liabilities
NBFI Non-Bank Financial Intermediation
NCA national competent authority
NFC non-financial corporations
NFCI net fee and commission income
NFRA National Financial Regulatory Administration
NII net interest income
NPL non-performing loan
NSFR net stable funding ratio
PAI Principal adverse impact
PSR Payment Services Regulation
PRSP Prudential Regulation and Supervisory Policy Department
PSD2 revised Payment Services Directive
PSP payment service provider
Q&A question and answer
QIS quantitative impact study
RAR Risk Assessment Report
RAST Risk Analysis and Stress-Testing Unit
RBM Risk-based Metrics Unit
RDB Risk dashboard
RegTech regulatory technology
RoE return on equity
RRAO Residual risk add-on
RTS regulatory technical standard
SA standardised approach
SCA&CSC Strong Customer Authentication and secure communication
SDFA Supervisory Digital Finance Academy
SFDR Sustainable Finance Disclosure Regulation
SME small and medium-sized enterprise
SNCI small and non-complex institution
SRB Single Resolution Board
SREP Supervisory Review and Evaluation Process
SRMR Single Resolution Mechanism Regulation
STS simple, transparent and standardised
SupTech supervisory technology
TF terrorist financing
TLAC total loss-absorbing capacity
TPP third-party provider
WP work programme
XBRL eXtensible Business Reporting Language

The risk landscape in 2024

The European economy saw modest growth with reduced inflationary pressures.

In 2024, the European economy struck a delicate balance between modest recovery and persistent internal and external headwinds. Real GDP growth was close to 1% for the European economy, marking a slow but steady rebound from earlier stagnation. Growth was, however, uneven across Member States, with southern European economies (such as Spain and Portugal) showing resilience, while Germany faced greater difficulties due to weakened industrial output and exposure to global trade. France, meanwhile, showed moderate growth supported by domestic demand in a context of political instability.

Employment remained a relative bright spot. Unemployment rates across the EU hovered near historic lows, with employment growth softening slightly to around 0.6%. Labour shortages in certain sectors, particularly healthcare, construction and technology, sustained wage pressures, although not enough to spark wage-driven inflation.

After peaking in 2022–2023, inflation moderated significantly in 2024. In several months, headline inflation in the euro area dipped below the ECB's 2% target, falling to 1.7% in September 2024, driven by lower energy prices and easing supply chain pressures. In response, the European Central Bank (ECB) began easing its monetary stance. Starting in June 2024, the ECB cut rates by 75 basis points over several months, bringing the deposit facility rate to 3% by the year end, with its forward guidance indicating a further decrease to 2% by late 2025. This was a marked shift from the aggressive tightening of the previous two years.

Geopolitical uncertainty emerged as the predominant risk factor

The EU economies faced numerous challenges, some of which became more pronounced. This included increasing geopolitical tensions, not only due to Russia's war of aggression against Ukraine, escalating conflicts in the Middle East, and a slowdown in global trade attributed to sluggish global recovery, particularly in China, which negatively impacted European export growth. Furthermore, the fragmentation of global supply chains posed a disadvantage to export-reliant EU economies. Additionally, geopolitical tensions between the US and China intensified. Geopolitical tensions further escalated in early 2025, in the wake of US tariffs and retaliation measures by some countries. This casts a shadow over export-reliant economies both within the EU as well as globally, and contributes to uncertainty and volatility in commodity and energy prices, creating further uncertainty for households and corporations alike.

Internal factors also contributed to uncertainty for the EU economy in 2024. Political instability created a political impasse in several countries during this year. The region also faced challenges from declining manufacturing output due to weak automotive sector exports arising from reduced demand and ongoing energy cost issues. Additionally, high levels of public debt and fiscal constraints posed difficulties for EU economies. The limited fiscal space restricted the ability of governments to stimulate growth or invest in infrastructure, the climate transition or digitisation. In technology, Europe lags behind the US and China in tech investments, AI adoption and startup ecosystems, partly due to low research and development intensity and fragmented capital markets that limit long-term productivity growth.

Many of these deficiencies were highlighted in the 'Draghi' and 'Letta' Reports published in 2024. The reports provide a comprehensive roadmap aimed at revitalising Europe's economic competitiveness through substantial investment, innovation and policy reforms.

European banks demonstrated resilience in this highly uncertain environment

European banks still benefited from high interest rates in 2024, which fuelled net interest income, resulting in record profits for the sector. The exceptional profit levels reported by EU/EEA banks enabled them to further strengthen their capitalisation. Despite the increased levels of payouts through dividends and share buybacks, weighted average CET1 ratios remained at around 16%. This exceeded the minimum requirements, with an average management buffer for EU/EEA banks estimated at more than 400 basis points. They also maintained strong liquidity levels without markedly increasing their funding costs.

The robust profitability, capitalisation and liquidity of EU/EEA banks provide a cushion for the underlying risks of the sector. These include heightened geopolitical risks, slow economic growth and inflation above central bank targets, and can result in lower asset quality, higher operational and cyber risks, as well as market and liquidity risks.

EU/EEA banks' lending growth rate slowed down as a result of risk aversion and stringent lending standards. There was only modest growth in lending to non-financial corporations (NFCs) and households throughout the year, with the latter being supported by renewed demand for mortgage lending during the final two quarters of 2024. The slow economic growth and sectoral idiosyncrasies resulted in a deterioration in asset quality. Yet, despite the heightened risks, mainly stemming from geopolitical uncertainty, the effect on banks' asset quality was moderate, partly because the robust labour market supported household spending. At the same time, corporate insolvencies increased but at a slower pace compared to previous years. The deterioration in asset quality was more notable for exposures related to the commercial real estate sector, due to cyclical and structural changes in this market. Although these markets stabilised towards the second half of 2024, sustaining their valuations, they still face potential downside risks.

Downside risks for EU/EEA banks remain highly susceptible to geopolitical developments. Banks not only have direct exposures to jurisdictions with heightened geopolitical tensions, but also have exposures to sectors directly affected by changes in the geopolitical landscape (e.g. tariffs on EU exports or supply chain disruptions). Geopolitical risks can extend beyond credit risk to market, liquidity and operational risks, including cyber risks. Geopolitical developments may exacerbate these risks by creating a risk-averse environment, which may lead to reduced growth potential, diminished investment, increased market volatility, and ultimately further impact banks' asset quality and capital. The heightened geopolitical tensions have also induced the need for increased defence spending for several EU countries, which could impact their levels of sovereign debt and raise sovereign debt sustainability concerns. EU/EEA banks hold substantial amounts of sovereign debt in their asset portfolios, whose valuation can affect banks' capital positions. Additionally, banks may be required to help finance increasing defence spending needs, which may exacerbate the sovereign-bank nexus.

In 2024, EU/EEA banks reported a substantial rise in their risk-weighted assets due to operational risk. This comes at a time when they are confronted with heightened ICT and cyber risks, in parallel with geopolitical developments and as banking services become increasingly digital. Banks have to invest in strong security measures to prevent data breaches and cyber-attacks. At the same time, the rapid pace of technological change means banks must continually innovate to stay competitive. Failure to do so could result in a loss of market share to more innovative peers or FinTech/BigTech companies, which are agile and quick to adopt new technologies. As such, the sector is also integrating AI to detect illicit activities and to enhance further customer-related services.

The interconnectedness between banks and non-bank financial intermediaries also posed a major risk to the EU banking sector and could create an adverse loop for financial stability. The increasing complexity of these linkages may create vulnerabilities during periods of financial instability.

Climate change poses significant financial risks for banks because of the increased frequency and severity of natural disasters. This became evident in 2024, as several catastrophic climate events took place across Europe. Although the impact was idiosyncratic and affected banks with substantial exposure to the industries or regions most affected by these events, EU/EEA banks need to promptly account in their risk assessments for the risk of higher default rates and increased loan losses due to climate risk.

Despite the robust position of EU banks, looming risks warrant increased vigilance. In January, the EBA launched another EU-wide stress test campaign for 2025. This exercise is a crucial component of the supervisory toolkit used by Competent Authorities to assess the resilience of EU banks to severe shocks, identify residual areas of uncertainties, and inform the supervisory decision-making process (SREP) to determine appropriate mitigation actions. Ultimately, the stress test informs the Pillar 2 Guidance (including P2G leverage ratio). It goes beyond examining depletions and CET1 ratios, and provides a comprehensive view of how banks may fare under adverse conditions.

The 2025 stress test scenario places a significant emphasis on worsening geopolitical tensions and their potential impacts. It highlights the risks associated with the escalation of conflicts and disruptions to global trade and supply chains, which could lead to a sharp economic contraction. This adverse scenario, while hypothetical, is designed to be severe, plausible, and reflective of the current economic and geopolitical uncertainties that might threaten the EU banking sector. It is essential to remember that the stress test is not a prediction but rather a tool to ensure that EU/EEA banks are prepared to weather potential challenges, as demonstrated in previous exercises where the CET1 ratio remained comfortably above 10% even under demanding scenarios.

Part I – Achievements of the year

1.1 Achieving the 2024 core priorities

In 2024, the European Banking Authority (EBA) completed 93% of the tasks outlined in its 2024 Work Programme (WP). Similar to the previous year, a small number of tasks were delayed or postponed, primarily because additional tasks were required that were not initially anticipated.

The EBA's deliverables included technical standards (regulatory technical standards (RTS) and implementing technical standards (ITS)), guidelines, responses to calls for advice, opinions, reports and peer reviews, reflecting the institution's role within the European Union's regulatory framework.

The sections below break down the EBA's main tasks and deliverables over the past 12 months in further detail, adhering to the priorities and structure of the 2024 WP. They include tables and visuals illustrating or detailing how the EBA executed the WP.

Overall, the achievements section offers insights into the scope of the EBA's activities, stressing an unwavering commitment to its regulatory responsibilities and its role in ensuring stability and integrity within the European banking sector.

Figure 1: 2024 achievements in figures

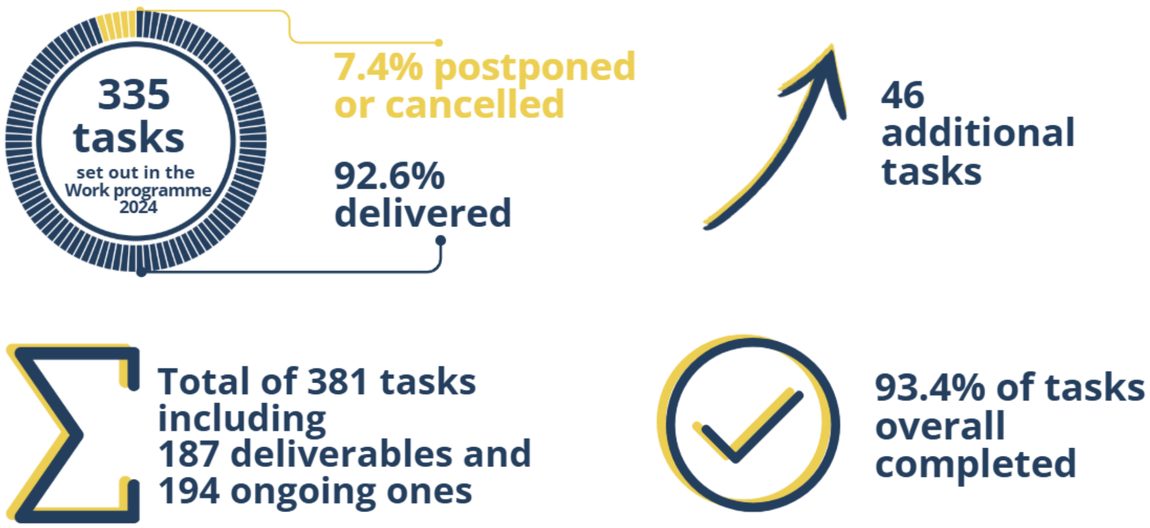
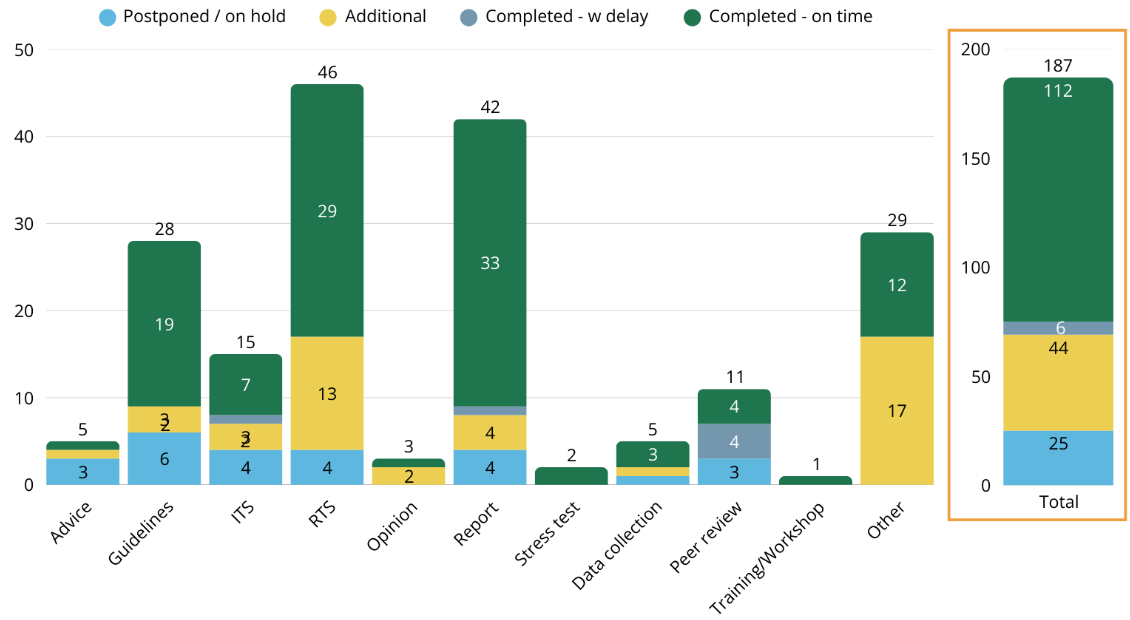


Figure 2: Breakdown of deliverables by category



NB: These deliverables do not include tasks that are ongoing in nature.

1.1.1 Implementing the Basel framework in the EU and enhancing the Single Rulebook

The EBA focused on its contribution to the timely and faithful implementation of the Basel III reforms in the EU to ensure banks can withstand future crises and to preserve a proper functioning of the European and global financial systems. This will underpin a strong regulatory framework, relying on more risk-sensitive approaches for determining capital requirements and also addressing previous shortcomings. At the same time, this work contributes to enhancing the Single Rulebook in banking and financial regulation.

Whereas the banking package, i.e. the Capital Requirements Regulation (CRR) III and Capital Requirements Directive (CRD) VI, entered into force in July 2024, in December 2023 the EBA published a roadmap detailing its approach to, and sequencing of, its work on the some 140 mandates in the different areas, in line with the legal deadlines set out by the co-legislators.

Overall, the EBA has so far issued Consultation Papers (CPs) on 24 mandates of the banking package, delivered on 10 mandates and delivered 8% of the planning foreseen under the roadmap.

Figure 3: number of mandates delivered under the Banking Package

Consultation papers on

16 Regulatory Technical Standards

5 Implementing Technical Standards

3 Guidelines

Final products

5 Regulatory Technical Standards

2 Implementing Technical Standards

1 Guidelines

2 Reports

FACILITATING BASEL III IMPLEMENTATION IN EUROPE

In accordance with Phase 1 of the roadmap, work was carried out in the area of **credit risk** with the publication of five CPs on the mandates, aimed at implementing critical elements of the standardised approach (SA) and the review of targeted elements of the internal ratings based (IRB) framework (review of the RTS on the categorisation of model changes and of the ITS on joint decision processes). In addition, the EBA published a report on the treatment of credit insurance in the prudential framework.

In the area of **operational risk**, work focused on preparing the CP on mandates relating to the calculation of the business indicator (BI) and its sub-items, mapping the BI to FINREP, as well as the adjustments to the BI following mergers, acquisitions and disposals. Further work included developing a CP on the taxonomy for operational risk losses, together with two mandates related to the management of operational risk losses. In parallel, the reporting framework for the new requirements concerning operational risk in CRR III was developed.

Many of the mandates on **market risk**, covered in a batch of CPs issued in 2023 and in 2024, related to aspects of the FRTB that are essential for sound implementation, or that have a material impact on own funds requirements, were also completed. As a result of the Commission's decision to postpone the application of the market risk framework in the EU in order to preserve an international level playing field, the EBA published a no-action letter on the boundary between the banking book and the trading book to help address technical questions and issues arising from the postponement.

Anna Gardella – Single market access

In 2024, I led the team in charge of projects relating to market access from third countries and from within the EU. These projects focused, on the one hand, on the implementation of the regime applicable to third country groups operating in the EU and, on the other hand, on the execution of material transactions, such as mergers, acquisitions and divisions.

I coordinated the development of the Level 2 and Level 3 mandates with a view to ensuring consistency of the policy approach of the various interconnected projects, as well as the coherent interpretation of the freshly adopted CRD6. This required a great deal of interaction with several stakeholders, including the European Commission, ESMA, EIOPA, financial stakeholders, as well as internally with EBA experts.

The projects relating to market access from third countries posed several challenges in ensuring consistency of the policy stance, as well as a coherent approach vis-à-vis the operation of third country groups in the EU. The new regime on third country branches is the first EU-led exercise in an area so far left exclusively to national level. Hence the need for clarity on the identification of what pertains to the general EU approach and what is still left within the national sphere.

As a team with a variety of expertise, we managed to address all these challenges and complexities and to promote a single policy view thanks to transparent dialogue with our stakeholders, effective planning and organisation of the work.

I am proud of the pillars we have set in the development of this new area of regulation that will contribute to shaping a single approach at EU level for third country groups operating in the EU.

The EBA continued its contribution to the Commission's renewed Sustainable Finance Strategy, announced in July 2021 as part of the European Green Deal, and paid particular attention to aspects relating to **environmental, social and governance (ESG)** matters reflected in its work, in accordance with the roadmap on sustainable finance published in December 2022.

Contributions in this field include the following: the EBA's final report on greenwashing, in response to a request from the Commission and produced in coordination with the other ESAs – the report also provides recommendations to institutions, supervisors and policymakers; a joint ESAs opinion on the review of the SDFR in which the ESAs call for a coherent, sustainable finance framework that caters for both the green transition and for enhanced consumer protection, taking into account the lessons learned from the functioning of the SFDR; as well as under the same regulation, the annual joint Article 18 report focusing on principal adverse impact (PAI) disclosures.

In addition, efforts were devoted to addressing ESG-related regulatory mandates conferred on EBA in the banking package. In this context, the authority issued guidelines on the management of ESG risks in early January 2025, which set out harmonised guidance to help EU banking institutions identify, measure, manage and monitor ESG risks, including for designing their transition plans to ensure their resilience in the short, medium and long term.

At the same time, the EBA published a CP on the draft guidelines on ESG scenario analysis in January 2025, which also aims to contribute to this field, albeit with a focus on institutions. The proposed guidelines set out expectations for institutions when adopting forward-looking approaches and incorporating the use of scenario analysis as part of their management framework to test financial and business model resilience to the negative impacts of ESG factors. These proposals complement the EBA guidelines on the management of ESG risks, published at the same time, and further deliver some of the elements set out in the EBA Roadmap on Sustainable Finance and as part of the EBA's planned actions for the implementation of the EU banking package.

With regards to the work on the prudential treatment of exposures subject to ESG risks, the focus was on data availability and the feasibility of adopting a standard methodology for ESG exposures with a corresponding report (published with a short delay in Q1 2025). Work has also started on incorporating ESG aspects into the disclosure and supervisory reporting that is being prepared as part of step 2 of implementing CRR III/CRD VI changes.

Following a first batch of CPs issued in 2023, the mandates relating to step 1 of implementing CRR III/CRD VI changes in the supervisory reporting framework and in the disclosure requirements for banks were finalised towards the end of Q2 2024 – and for investment firms in Q4 – thereby allowing early implementation of these elements and ensuring that market participants and supervisors have access to the information they need to assess institutions for their respective purposes.

In the context of the banking package, the EBA has taken into consideration the recommendations of the Advisory Committee on Proportionality (ACP) to ensure that the regulatory products and guidance it delivers are drafted in a way that is consistent with and uphold the principle of **proportionality**, and reduce compliance costs without damaging the prudential objectives. The ACP viewed that the development of RTS, ITS, GL and Q&As could reflect proportionality by (i) setting different scopes, (ii) aiming for less complex regulation, (iii) using easy language and (iv) having the implementation impact on small and medium-sized banks in mind. In particular, the ACP recommended that the EBA further address proportionality in the credit risk framework, given its relevance for banks' balance sheets regardless of size, range of activity and level of complexity.

The ACP also recommended that proportionality considerations remain at the core of the impact assessments that accompany the regulatory products and guidance. In the area of **securitisation and covered bonds**, the ESAs provided a report on the securitisation framework under Article 44 of the Streamlined Energy and Carbon Reporting (SECR) Directive. Prioritising this request led to the deprioritisation of three monitoring reports. The EBA has also started working on a call for advice from the Commission to support the revision on the performance of the EU covered bonds framework, mandated in Article 31 of the Covered Bonds Directive, and expects to deliver it in Q2 2025.

Roberta de Filippis – Securitisation and covered bonds

In 2024, I led a talented team in reviewing the EU securitisation and covered bond frameworks. Our work required extensive coordination with various stakeholders, including the European Supervisory Authorities and the European Commission. Building on the EBA's previous efforts, we focused on harmonising and strengthening the securitisation market to advance the Saving and Investment Union. Regular meetings with ESMA and EIOPA colleagues were crucial for keeping everyone informed and engaged.

In 2024, I also oversaw the comprehensive review of the EU covered bond framework in response to the Commission's Call for Advice. This required effective communication and continuous cooperation with covered bond supervisors from all EU Member States and various industry stakeholders. Internal coordination with other EBA units was also key to ensuring a consistent approach on ESG-related topics.

Reflecting on 2024, I am proud of our achievements. Leading the securitisation and covered bond team through several transitions and unexpected challenges was both demanding and rewarding. The cooperative environment and efficient coordination enabled us to adapt and thrive, preparing us for future challenges and successes.

Work continued to respond to a call for advice for the purposes of a second benchmarking of national loan enforcement frameworks (insolvency benchmarking). The EBA launched an update of the first benchmarking exercise in 2020 to publish a report in 2025. This allowed for a considerable reduction in the burden for euro area banks, as the related ad hoc data collection was limited to data needs not covered by the AnaCredit dataset.

In the area of **investment firms**, the EBA focused on the remaining mandates stemming from the new regulatory regime set out in the IFR/IFD. This led to the publication of guidelines on the application of the group capital test, for investment firms setting harmonised criteria to address the observed diversity in the application of such tests across the EU. Progress was made on the response to the European Commission's call for advice, with a discussion paper published in June 2024 to gather stakeholder feedback and ad hoc data collection. The feedback will inform the response that the EBA and ESMA intend to provide jointly, and which will include a broad assessment of the provisions of the IFR and IFD and their interaction with other regulations.

REAPING THE BENEFITS OF THE SINGLE RULEBOOK

The EBA updated the list of Common Equity Tier 1 (CET 1) instruments in December 2024, addressing bank **liabilities**. It also monitored developments in capital and capital issuances (Additional Tier 1 (AT1), Tier 2 and total loss-absorbing capacity /minimum requirement for own funds and eligible liabilities (TLAC/MREL) instruments), and published its monitoring report in

June 2024, with new guidance on the prudential valuation of non-CET1 instruments and other aspects related to the terms and conditions of issuances.

Furthermore, the EBA continued its work on implementing the EBA opinion on legacy instruments (including in the context of the CRR II grandfathering provisions) and, after providing guidance on one specific issuance of legacy Tier 2 instruments in January 2024, addressed a further case in December 2024.

As a result of reviewing the **stacking orders** of capital, leverage and MREL/TLAC requirements and related capital buffers, in July 2024 we published a report describing the role of regulatory stacks, summarising the differences between the EU, UK and US frameworks, and highlighting institutions' practices on management buffers. The findings contributed to other EBA regulatory products, such as the mandate on the interplay between the output floor and Pillar 2 (Article 104a(7) CRD6), which was also the topic of an EBA opinion published in January 2025, as well as the updated supervisory review and evaluation process (SREP) guidelines planned for 2025.

A report on **liquidity** measures published in December 2024 set out the findings of the monitoring and evaluation of the liquidity coverage requirements currently in place in the EU. It highlighted that, between June 2023 and June 2024, EU banks' liquidity coverage ratio (LCR) increased by three percentage points to reach 167%, and also reveals changes in the composition of banks' funding deposits, while banks' holdings of liquid assets steadily increased.

At the beginning of 2024, the EBA published a report about specific aspects of the net stable funding ratio (NSFR) framework. The report provides an evaluation of the materiality of the specific items analysed, as well as an assessment of the impact of possible changes to the current prudential treatment. All analysed items appear to have limited materiality in terms of contribution to the total required stable funding, and this situation is confirmed for major as well as smaller banks. A change in the regulatory treatment of such items is not expected to have material effects on institutions but would generate compliance costs. Moreover, the current treatment appears to be aligned with other jurisdictions, which means that any changes would jeopardise the level playing field. The EBA therefore concluded that no changes are needed to the current legislation.

As part of **Pillar 2** work, the EBA monitored the impact of the interest rate environment on own funds and eligible liabilities aspects, as set out in its heatmap following scrutiny of how the interest rate risk in the banking book (IRRBB) standards are being implemented in the EU. The heatmap published in January 2024 set out policy areas that would be subject to further scrutiny, and corresponding actions in the short to medium and long term. An initial follow-up report reflecting on the short/medium term objectives of the heatmap was prepared during 2024 and published in early February 2025.

The EBA continued to monitor implementation of the GL for the SREP, with particular consideration of the recommendations made by the ACP. This work also relied on the EBA's ongoing assessment of supervisory practices through the European Supervisory Examination Programme (ESEP) and the monitoring of its implementation, and through participation in supervisory colleges. The report on the convergence of supervisory practices, published in July, shows that there is still room for further consistency in the identification and treatment of risks covered by Pillar 2 requirements across the EU, while supervisory college monitoring confirmed that the annual college cycle is functioning well.

As in previous years, the authority continued its **benchmarking** activities in both credit and market risk models (inclusive of IFRS 9-related considerations) in order to support Competent

Authorities (CAs) in assessing the internal approaches used for the calculation of own funds requirements and for remuneration practices.

In the area of **governance**, the ESAs (EBA, EIOPA, ESMA) published joint guidelines on the system for exchanging information relevant to fit and proper assessments, with a view to enhancing the information exchange between supervisory authorities in a dedicated system across different parts of the financial sector.

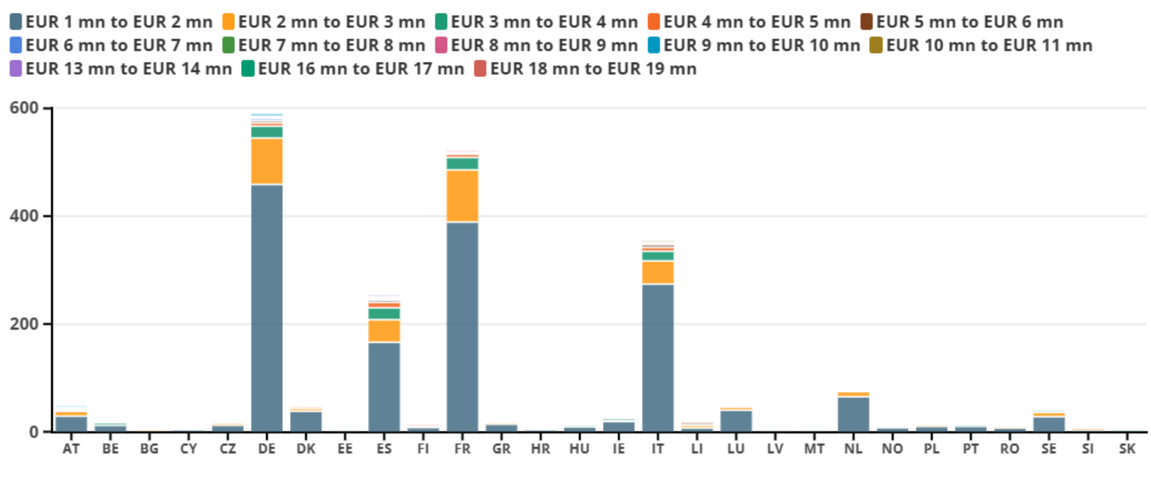
On the topic of remuneration, in July the authority published its report on the application of gender-neutral remuneration policies by institutions subject to the CRD and the IFD, based on information collected from institutions, investment firms and CAs. The report shows that the industry faces no major hurdles in adopting and implementing gender-neutral remuneration policies, but that some entities lag behind.

Separately, in July 2024, the EBA published a report on the application of derogations from the requirements on deferral and payout in instruments under the CRD. This work aimed to assess the implementation and application of derogations within the EU, their impact on costs, the risk alignment of variable remuneration vis-à-vis the risk profile of the institution, and their impact on the ability to recruit and retain staff.

The annual report on high earners, based on 2022 data (covering entities subject to both CRD and IFD), was published in April 2024 and the report based on 2023 data was published in December 2024. The reports show an increase in the number of individuals working for EU banks and investment firms who received remuneration of more than EUR 1 million between 2021 and 2022. This increase is linked to the overall good performance of institutions, with the expansion of business and salaries adjusted for inflation. Later on, in 2023, the number of high earners remained stable overall, with an increase in high earners in banking and a decrease in high earners in investment firms. These changes were mainly caused by the more volatile business model of investment firms and reduced profitability in 2023 compared to 2022, while banks, on average, continued to perform well.

In 2024, the EBA simplified its regular annual report on high earners' remuneration into a dashboard to visualise data in a more appealing way for interested stakeholders.

Figure 4: Number of high earners (data for 2023) by Member State and payment bracket of one million euros for institutions and investment firms



Source: Supervisory reporting

In May 2024, the EBA received a mandate from the Commission to each year develop a set of indicators about the market share of non-EU entities operating in the EU banking sector and the concentration of their business models in specific countries or sectors of activity. The mandate also requires the EBA to analyse EU banks' asset and liability exposures in foreign currencies. In response to the second part of the mandate, the EBA delivered a report in December 2024 analysing EU banks' funding structure, their reliance on foreign (significant) currencies for funding, and the breakdown of EU banks' exposures by domestic and foreign currency.

KPIs

	Indicator	Weight	Short description	Target	Achievement
A	Number of technical standards, guidelines, reports delivered (Output)	80%	Number of technical standards, guidelines and reports, most including analytical impact assessments, delivered on time and stemming from implementation of the CRD VI / CRR III / BRRD III	80%	81%
B	Number of technical standards, guidelines, reports delivered – ESG (Output)	20%	Number of ESG-related technical standards, guidelines and responses to CfA, most including analytical impact assessments, stemming from the mandates in the EU regulations and directives and from the renewed Sustainable Finance Strategy of the Commission delivered on time. Source: Annual activity report	80%	100%

1.1.2 Monitoring financial stability and sustainability in a context of increased interest rates and uncertainty

Within this priority, the EBA placed increased focus on the impact of slow growth and high interest rates on the real economy in general, and on the banking sector in particular, in a context of inflationary pressures and against the background of unstable geopolitical and economic circumstances (see Section 1.2.1).

Findings from the EBA's risk assessment work were reflected in deliverables such as the quarterly risk dashboard and the joint committee (JC) spring and autumn risk presentations, as well as the JC report on risks and vulnerabilities. Starting from 2024, the EBA evolved its annual Risk Assessment Report into a spring and an autumn edition, with the latter linked to the publication of the results of the 2024 EU-wide transparency exercise (discussed below).

The RAR is complemented by the regular MREL monitoring conducted by the EBA and publicised in the form of a dashboard summarising the state of play in resolution planning for all banks with a resolution strategy in the EU, stating the level of MREL requirement, the level of resources and resulting shortfalls and roll-over needs.

The introduction of top-down elements for NFCI in the previous exercise helped to shape the approach and methodology for the 2025 exercise. This gave rise, in July 2024, to an informal consultation on the draft methodology, templates and guidance for the 2025 EU-wide stress test, with important changes worthy of note, namely the integration of the Capital Requirements Regulation (CRR3), the Commission's announcement to postpone the application date of the fundamental review of the trading book (FRTB), the centralisation of net interest income (NII) projections, but also advancements in the market risk methodology to increase risk sensitivity.

Expanded geographical reach and the incorporation of proportionality features aim to boost efficiency while ensuring the relevance and transparency of the results, with the latter addressing the recommendations of the ACP.

Drawing on the feedback received, the EBA then proceeded to publish the final methodology, draft templates and template guidance for the 2025 EU-wide stress test, along with the milestone dates for the exercise in November 2024.

In addition to the work on the regular stress test exercise, the EBA undertook a one-off Fit-for-55 climate risk scenario analysis jointly with ESMA, EIOPA, the ECB and the ESRB, the results of which were published in November 2024. The exercise, which is part of mandates received under the European Commission's Renewed Sustainable Finance Strategy, was aimed at assessing the resilience of the financial sector in line with the Fit-for-55 package, and to gain insights into the capacity of the financial system to support the transition to a lower carbon economy under stress conditions.

Scenarios of the Fit-for-55 climate stress test

The climate stress test was conducted against three scenarios developed by the European Systemic Risk Board (ESRB), with the support of the ECB. The scenarios incorporated transition risks as well as macroeconomic factors, based on the assumption that the Fit-for-55 package is implemented as planned.

- Under the baseline scenario, the Fit-for-55 package is implemented in an economic environment that reflects the ESCB's June 2023 forecasts, while still facing additional costs related to the green transition.
- Under the first adverse scenario, transition risks materialise in the form of 'Run-on-Brown' shocks, whereby investors shed assets of carbon-intensive firms. This hampered the green transition, since 'brown' firms do not have the financing they need to green their activities.
- Under the second adverse scenario, the 'Run-on-Brown' shocks are amplified by other standard macro-financial stress factors.

The results of the exercise show that estimated losses stemming from a 'Run-on-Brown' scenario have limited impact on the EU financial system. Over the 8-year horizon, total first-round losses stand at between 5.2% and 6.7% of starting point exposures in each sector. The second-round losses are mostly relevant for investment funds, and amount to 11.2% of starting point exposures.

Moreover, the interaction of adverse macro-financial developments with transition risk factors could disrupt the evolving transition and substantially increase financial institutions' losses, thereby impairing their financing capacity. This was assessed in the second adverse scenario where the 'Run-on-Brown' shocks are coupled with adverse macroeconomic conditions. Under this scenario, the first-round losses registered by banks, insurers, occupational pension funds and investment funds stood at between 10.9% and 21.5%, depending on the sector. Although sizeable, the impact of these losses on financial institutions' capital appeared to be mitigated by factors such as banks' income, insurers' and occupational pension funds' liabilities, and cash holdings by investment funds that were not included in the assessment.

In addition, the EBA has been working on incorporating climate-related risks into the EU-wide stress test in order to address the mandate in our founding regulation (Articles 23 and 32). A proposal was presented at the BoS meeting in December 2024, receiving support from the members.

The proposal outlines the EBA strategy, and distinguishes between a short-term module to assess capital adequacy and a long-term module to evaluate banks' business model resilience, leveraging scenario analysis. According to this strategy, the incorporation of climate risks into the EU-wide stress-testing framework should be gradual, starting with a partial integration ('combined approach') in 2027, with more climate risk-related elements being added in subsequent stress tests. The combined approach will leverage the processes and infrastructure (e.g. timeline, FAQs, data collection and data quality checks) and some core methodological assumptions (e.g. static balance sheet, three-year time horizon) of EU-wide stress test, allowing for economies of scale and reducing the burden, both for banks and for supervisors. However, a clear separation between the results of the climate stress test and the results of the EU-wide stress test should be ensured, at least for the first application, for communication and supervisory action purposes.

Following the guidance provided by the BoS Members in December, work in the coming months will focus on developing concrete proposals for the implementation of the combined approach, while starting to discuss the possible high-level framework for the long-term module. Efforts will be made to ensure adequate coverage and assessment of physical risks (including their acute dimension), in addition to transition risks, for instance through the development of ad hoc scenarios. Efforts will also be made to ensure the principle of proportionality is included, as well as promoting alignment with the EU-wide stress test technical framework as far as possible.

KPIs

	Indicator	Weight	Short description	Target	Achievement
A	Achievement of milestones ahead of the upgrade of ST methodology and development of a hybrid model (Output)	50%	1. Approval of the revised EU-wide stress test framework by Q1 2024 2. Design of the new ST methodology by end of 2024 3. Implementation of the revised EU-wide stress test framework for the 2025 exercise	70%	100%
B	Development and execution of a one-off and regular climate stress test (Output)	50%	1. Development of a one-off climate stress test and regular climate stress test 2. Implementation of one-off climate stress test 3. Implementation of regular climate stress test	70%	100%

Source of information KPI A, KPI B: EBA WP monitoring tool and publications.

1.1.3 Providing data infrastructure at the service of stakeholders

The EBA continued implementing its data strategy to improve the way regulatory data are acquired, compiled, used and disseminated to relevant stakeholders, thereby strengthening analytical capabilities. Its EUCLID platform enables data flows between diverse endpoints and provides access to high-quality, curated data and insights to internal and external stakeholders by employing advanced technical capabilities, with the objective of fostering the ingestion and dissemination of critical data assets, insights and analytics policies, as well as implementing the Pillar 3 data hub requested by the Level 1 legislation. In the last quarter of 2024, planning started for a 2025 review of the EBA's data strategy, keeping in mind the 2026–2028 horizon and a close alignment with the EBA's ICT Strategy for the same period.

Table 1: EUCLID in numbers

	How many	Data from	Reporting areas (up to EBA DPM v3.5)
All EU/EEA credit institutions	~4 400	Q4 2020	COREP (solvency, large exposures, liquidity, leverage ratio, fundamental review of the trading book, supervisory benchmarking of internal models, asset)
All EU/EEA banking groups	>500	Q4 2020	
Largest credit institutions or banking groups	>160	Q1 2014*	Encumbrance, interest rate risk in the banking book, FINREP (IFRS9, national GAAP), Funding Plans, Environmental, Social and Governance, Resolution (Planning, MREL Decisions, MREL/TLAC), Global Systemically Important Institutions, Remunerations (High Earners, Benchmarking, Higher Ratio, Gender Pay Gap and Diversity Benchmarking)
All EU/EEA Investment firms	>2 300	Q3 2021	Investment Firms (CLASS2, CLASS3, GroupTest), COREP (solvency, large exposures, liquidity, leverage ratio, fundamental review of the trading book, supervisory benchmarking of internal models, asset encumbrance, interest rate risk in the banking book), FINREP (IFRS9, national GAAP), Remuneration (High Earners, Benchmarking, Higher Ratio, Gender Pay Gap and Diversity Benchmarking), Resolution** (Planning, MREL Decisions, MREL/TLAC)
All EU/EEA Investment firms' groups	>200	H2 2021	
All EU/EEA payment institutions	>3 200	H1 2019	Payments, Resolution** (Planning, MREL Decisions, MREL/TLAC)
All EU/EEA e-money institutions	>300	H1 2019	Payments

* Data for ~50 Key Risk Indicators from Q4 2008 onwards is available at the EBA for ~50 institutions from 20 EU countries, covering at least 50% of the total assets of each national banking sector. Numbers are based on non-harmonised prudential and financial reporting standards applicable in the EU before 2014. From Q1 2014 onwards, the data available at the EBA for the sample of largest credit institutions and banking groups accounted for more than 80% of EU banking sector total assets.

** Long-term expectations.

As it did in 2023, the EBA contributed to fostering transparency and market discipline in the EU banking sector. In December 2024, the authority published the annual transparency exercise, together with the autumn 2024 edition of the Risk Assessment Report (RAR). This provided transparency on around 9 500 data points per bank, in a comparable and accessible format, for 123 banks from 26 countries across the EU and EEA, complementing banks' own Pillar 3 disclosures, as required by the EU's CRR. The EBA provided users with a variety of interactive tools to visualise and compare data over time, both by country and by individual banks on capital positions, financial assets, risk exposure amounts, sovereign exposures and asset quality of the EU banking sector covering the latter half of 2023 and the first half of 2024. To reduce the reporting burden for the entities, the exercise was exclusively based on supervisory reporting data submitted to the EBA via EUCLID.

The EBA also carried out a number of data-driven analyses and it supported calls for advice, providing insights and comprehensive analyses that significantly enhanced decision-making processes and increased transparency. In 2024, the EBA provided a draft report in response to the CfA on EU banks' funding and exposures in foreign currencies and a CfA on the market share of non-EU entities operating in the EU banking sector and the concentration of their activity in specific countries or sectors. The EBA leveraged existing FINREP data to create an EU-level set of indicators.

In the field of data collection, in 2024 the EBA began adapting EUCLID for receiving data from new types of reporting entities (MiCA/DORA) and new directly reported data flows (MiCA, Pillar 3). Regarding data dissemination, the EBA Risk Dashboards publication process was streamlined, resulting in more timely publication and increasing the value of the reported data. The EBA offered more visualisation tools and digitalised the RAR to provide better data insights and easier use of data. The EBA also expanded its offering to competent and resolution authorities of its EBA Data Access Portal (EDAP) with master data and report monitoring and data quality indicators.

The EBA continued to implement the Pillar 3 data hub envisaged by the Level 1 legislation. Building on the feedback received on the discussion paper launched in 2023, a pilot exercise with voluntary institutions to test the process for large and other institutions was completed in 2024. Conclusions from this pilot exercise, together with the feedback received during the consultation, were taken into account when finalising the draft ITS covering IT solutions, data exchange formats and technical validations. The final draft ITS were submitted to the Commission for adoption in February 2025.

The Pillar 3 hub will ultimately be connected to the European single access point (ESAP), on which the ESAs published the final draft ITS specifying certain tasks of the collection bodies and functionalities in October 2024. The published ITS represent the first milestone for the successful establishment of a fully operational ESAP.

In the area of integrated reporting, the governance structures were set up in 2024, following the finalisation and publication in March of the MoU signed with the ECB. The Joint Bank Reporting Committee (JBRC), which is the forum for collaboration between European and national authorities on reporting topics, had its first meeting in May. The JBRC will cooperate with the industry through the Reporting Contact Group, which was established with 22 members and had its first meeting in November. Furthermore, one of the main tasks of the JBRC – achieving semantic integration – was also launched, with the creation of an expert group on semantic integration that started its work based on the roadmap and methodology for semantic integration developed jointly by the ECB and the EBA during the first half of the year. This work will increase efficiency in reporting by streamlining and aligning definitions, as well as removing overlaps and redundant requirements.

Anca Dinita – Integrated reporting

What is the project about and your role?

As the EBA team lead for the Integrated Reporting project, I have the privilege of being at the forefront of transforming how we deal with data, a valuable yet scarce and costly resource. Moving away from siloed approaches, it is essential that we, as authorities, collaborate more closely in defining and collecting the data we need and share it responsibly, under the appropriate legal frameworks.

In my role I collaborate and work alongside exceptional colleagues from the EBA and from national and European authorities, contributing to the development of a more efficient and effective approach to reporting data for all stakeholders involved, including industry.

What are the challenges of the project?

The challenges we face are complex, stemming from the diverse needs of numerous stakeholders and the necessity to maintain accurate and reliable reported data, even when regulations are being updated. Therefore, we have adopted a step-by-step approach to achieve greater integration.

The year 2024 represents a significant milestone for the project. The EBA and ECB established the Joint Bank Reporting Committee to oversee the development and implementation of an integrated approach. Similarly, the DPM alliance between the EBA, EIOPA and the ECB was formed to create a common governance framework for the DPM2.0 meta model, marking the first step towards building a unified data dictionary.

Preparatory technical work for integration started some years ago and is now being continued under the new governance frameworks, reflecting our ongoing close collaboration among the multitude of stakeholders involved.

In 2024, the EBA announced the implementation of the enhanced Data Point Model and methodology, DPM 2.0, to ensure the EBA data dictionary is fit for future challenges of reporting and digital processing. DPM 2.0 was used for the reporting release 4.0 framework, published in December 2024. In parallel and in preparation for the migration to DPM 2.0 and for the work on integrated reporting, the EBA has conducted a quality review of its DPM data dictionary definitions to improve its semantic glossary, and the way the latter is used to define the reporting variables included in the EBA's regulatory frameworks. Release 4.0 incorporates the revised glossary. Finally, the EBA started using the new Digital Regulatory Reporting tool, DPM studio, to produce the reporting frameworks, including the DPM releases, the complete validation rules lifecycle, and the creation of XBRL taxonomy packages. Both the DPM standard 2.0 and DPM studio were developed jointly with EIOPA.

Tomas Meri – Master data management

What are some of your main tasks as Team Leader?

As Team Leader for Master Data Management (MDM), one of my responsibilities is to map business needs to system configurations and coordinate efforts across Competent Authorities (CAs) and Resolution authorities (RAs) and other EU institutions, such as the ECB and the SRB. The main goal of my team is to ensure that master data is of good quality and up to date. We also regularly configure the system for new mandates, such as the recent IRRBB, DORA Register of Information, diversity benchmarking, MiCA, resolution planning and CRR3/CRD6 changes.

What is master data?

Master data is information about the reporting entities. In the statistical domain, master data provides the most foundational information about entities and their attributes, unique identifiers, hierarchies and relationships within an organisation. This information is shared across business functions and systems to support business processes and decision making via a Master Data Management (MDM) function, which is a critical component of any organisation's data strategy, particularly in complex organisations with multiple stakeholders, where data silos can lead to inefficiencies and errors.

What does you team do?

The role of MDM is to:

- Clean, enrich and standardise data for key functions before it is loaded into the data lake, ensuring its accuracy, completeness and consistency;
- Provide a hub for high-quality data across entities, which improves the effectiveness, consistency and reliability of data products. This results in enhanced decision making, accurate reporting and analysis, and compliance with regulations and standards;
- Standardise data across entities to provide a unified view across various systems.

At the EBA, master data is also needed for publishing registers (for instance, the credit institution register) and for setting correct reporting obligations when collecting data. Master data is managed via the EBA's EUCLID system, where the EBA is responsible for system configurations and CAs/RAs for ensuring master data is up to date.

Furthermore, the publication of guidelines on the resubmission of historical data under the EBA reporting framework provided a common approach for financial institutions in case there are errors, inaccuracies or other changes in the data reported in accordance with the supervisory and resolution reporting framework developed by the EBA. This will enhance the quality, consistency and completeness of reported data. They deliver on one of the remaining open recommendations set out in the 2021 Cost of Compliance report and thus conclude the work on the related roadmap. Policy work on reporting and transparency is covered under Sections 1.1.1, 1.1.4 and 1.4.2.

As part of the EBA's continued efforts in the field of supervisory disclosure, in November 2024 the EBA updated the centralised information disclosed by EU CAs, in accordance with their ITS on supervisory disclosure under CRD and IFR, which provide for the information being accessible in one single electronic location. This includes information regarding the laws, regulations, administrative rules and general guidance adopted by the Member States in the field of prudential regulation and supervision, aggregate statistical data on key aspects of the implementation of the prudential framework in each Member State, but also information on options and national discretions available in EU banking legislation and general criteria and methodologies used by national authorities in the SREP.

KPIs

	Indicator	Weight	Short description	Target	Achievement
A	Timeliness of reporting (ratio %) (Results / Impact)	25%	From EUCLID: Accepted modules / Expected modules by remittance date (T)+10 working days (wd)	>95%	97.15%
B	Completeness of reporting (ratio %) (Results / Impact)	25%	From EUCLID: Not reported / Expected templates by remittance date (T)+10 wd	<0.1%	0.03%
C	Accuracy of reporting (ratio %) (Results / Impact)	25%	From EUCLID: Failed error rules / Total of error rules executed against the received file by remittance date (T)+15 wd	< 0.1%	0.02%
D	Time to publication of Quarterly Risk Dashboard (nbr days) (Results / Impact)	25%	Working days from final remittance date of supervisory data (based on the EBA's DC 404) to date of publication on the EBA's RDB web page	< 15	19

* Target for KPIs have been adjusted from: KPI A > 85%, KPI B < 1%, KPI C < 0.25, KPI D <30.

Source of information KPI A to D: EUCLID.

1.1.4 Developing an oversight and supervisory capacity for DORA and MiCA

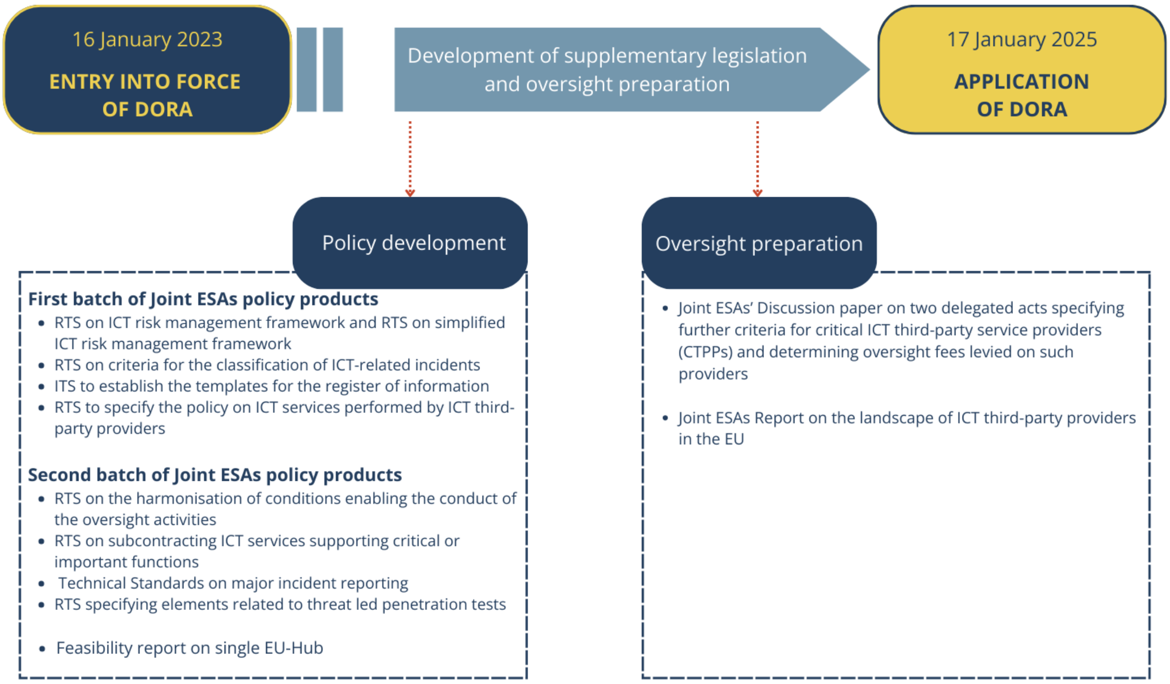
DORA and MiCA are part of the EU Digital Finance Strategy, which aims to ensure that the current legal framework does not pose inadvertent obstacles to the use of new technologies and the emergence of new products while ensuring effective risk mitigation.

In 2024, the EBA, together with other appropriate ESAs, finalised the MiCA and DORA policy mandates, thereby contributing to the ICT risk management dimension of the Single Rulebook and to a consistent framework for the regulation and supervision of crypto-asset activities.

DORA POLICY

DORA, which entered into force on 16 January 2023, has applied from 17 January 2025, with the ESAs collectively delivering 13 legal instruments in January and July 2024 in relation to ICT risk management, incident reporting, third-party risk management, testing and oversight. In doing so, the ESAs took into consideration the feedback from the market and recommendations of the Joint ESA ACP. On 7 March, in response to the Commission's rejection of the draft ITS on the registers of information, the ESAs published and submitted an opinion on these ITS to the Commission.

Figure 5: Regulatory products and reports under the DORA mandate



With the delivery of the regulatory mandates, there was additional focus on preparing for the taking up of the new roles and tasks assigned by DORA.

DORA OVERSIGHT

The EBA, together with EIOPA and ESMA, advanced its preparations for oversight over CTPPs. This included the establishment of the new governance structures, namely the Oversight Forum (a new JC subcommittee) and the Joint Oversight Network (ESAs), as well as the arrangements to set up and operate the Joint Examination Teams. The ESAs have also been preparing the methodologies and processes to support the oversight activities. New IT systems are being developed to support the designation of CTPPs and future collaboration when performing oversight tasks.

To jointly tackle their new oversight responsibilities over CTPPs, the ESAs set up a joint directorate to pool the resources allocated by the legislation to carry out the oversight tasks with the support of NCAs in the Joint Examination Teams (JETs). This will ensure maximum consistency in the oversight approach towards CTPPs, optimise the use of resources (avoiding redundancies), including for their allocation over time, and facilitate the development of a common oversight culture in largely uncharted territory. The director leading the new joint directorate was recruited in October 2024 and is responsible for implementing and running the oversight framework for CTPP at European level, contributing to the smooth operation and stability of the EU financial sector.

To build operational and ICT risk capacities internally during the execution phase of the implementation plan, the EBA offered training in-house, via the EU Supervisory Digital Finance Academy, and other means with a view to building competencies at the ESAs and CAs for managing DORA-related activities. The EBA also offered training for staff on oversight techniques, policies and procedures.

One of the essential components of the DORA framework is the designation of CTPPs. To support this first step of the oversight activity, in November 2024 the ESAs published a decision providing a general framework for the annual reporting to the ESA of the information necessary for CTPP designation, including timelines, frequency and reference dates, general procedures for the submission of information, quality assurance and revisions of submitted data, as well as confidentiality and access to information. In particular, the decision requires CAs to report by 30 April 2025 the registers of information on financial entities' contractual arrangements with ICT third-party service providers. While the ITS on the registers of information was adopted late by the Commission, the essential part of the requirements for registers of information has been available since April 2024.

To support industry preparations, the ESAs shared the draft templates, DPM and reporting technical package in May 2024 and carried out a voluntary dry run exercise on the reporting of registers of information, with the participation of around 1 000 financial entities across the financial sector in the EU. As part of the exercise, the ESAs have published numerous supporting documents, organised three industry workshop with a wide reach of participants, and provided data quality feedback to the participating financial entities. The support offered by the ESAs did not stop with the publication of the dry run summary report in December 2024, as the ESAs have continued updating supporting explanatory documents and the frequently asked questions on the dedicated web page throughout 2024 and 2025.

Antonio Barzachki – DORA oversight preparations

The team that I lead is responsible for establishing the novel oversight function under DORA on critical providers of ICT services (e.g. cloud services, security management) to financial entities. This oversight function aims at providing assurance that the critical providers manage their risks effectively, thus ensuring continued and secure provision of financial services to consumers, and the stability of the financial system.

We embarked on the journey of developing the oversight framework more than two years ago, jointly with colleagues from EIOPA and ESMA and closely cooperating with national authorities and other EU institutions. Throughout this journey, we have successfully progressed multiple parallel activities, met tight timelines, navigated through complex governance, managed many different stakeholders, mitigated various risks and resolved all issues faced.

At the end of 2024, I am proud to say that thanks to the motivation, commitment and high-quality work of the team, we are almost ready. We have established a first of its kind cross-ESA joint team, for oversight made up of staff from the three authorities. We have set up the governance structures, the operating model, and are in the process of finalising the internal methodologies and IT tools to support the oversight activities.

I am confident that we are well prepared to designate the critical providers of ICT services and to start engaging with them in 2025.

OTHER DORA TASKS

In line with the relevant ESRB recommendation, the ESAs announced in July 2024 the establishment of the EU Systemic Cyber Incident Coordination Framework (EU-SCICF) in the context of DORA, which was accompanied by the publication of a factsheet. This framework will facilitate an effective financial sector response to a cyber incident that poses a risk to financial stability, by strengthening coordination among financial authorities and other relevant bodies in the European Union, as well as with key actors at international level.

With the completion of the policy mandates and the approaching DORA application date, the ESAs also intensified their work to help converge supervisory practices in the implementation of the new framework. This led to the publication in December 2024 of a joint ESA statement, to ensure that financial entities are prepared for the new requirements, particularly on the register of ICT third-party providers and on the reporting of ICT incidents.

MiCA POLICY

For MiCA, which entered into force on 29 June 2023, and the provisions relating to asset-referenced tokens (ARTs) and electronic money tokens (EMTs) applying from the end of June 2024 (the remaining provisions applying from the end of December 2024), the EBA delivered 20 technical standards and guidelines in 2024 (two of which were joint with the ESMA, and one with the ESMA and EIOPA), and one set of own initiative guidelines to address reporting gaps under MiCA. The policy mandates under MiCA expanded the common Single Rulebook for crypto-asset issuance in the EU, with the aim of enhancing consumer protection (e.g. with clear rules on complaints handling), governance (e.g. measures to identify and address conflicts of interest), prudential resilience (e.g. regarding reserve, recovery and redemption arrangements), and reporting requirements.

MiCA SUPERVISION AND OTHER TASKS

MiCA confers on the EBA supervision tasks with regard to ARTs and EMTs that are determined by the EBA to be 'significant'. In 2024, the EBA took preparatory steps for these tasks and developed its framework for significance assessments and supervisory policies and procedures and forms, templates for the exchange of information between all relevant parties (including supervised issuers, national CAs, the ECB and other relevant central banks). In parallel, the EBA developed the IT capabilities needed to support the EBA's supervision function. The EBA also established the CASC to support the authority in the performance of its supervision tasks[1], as a replacement of its temporary CSCG, which met throughout 2024 to facilitate knowledge-sharing between CAs and support supervisory convergence efforts in the initial phase following the application of MiCA. In 2024, the EBA also worked towards strengthening its supervisory capacity, in particular by further extending training for staff, and by organising workshops with NCAs on techniques for the supervision of issuers of ARTs and EMTs.

As part of its convergence efforts, in July 2024 the EBA published a statement addressed to issuers, consumers and other relevant stakeholders. In the statement, the EBA reminded (prospective) issuers of ARTs and EMTs of the new requirements under MiCA, and drew attention to the relevant technical standards and guidelines. The EBA also drew attention to factors that consumers can check before deciding whether to acquire an ART, EMT or other type of crypto-asset, and reminded consumers of the risks of acquiring crypto-assets that have not been issued in accordance with the applicable provisions of MiCA. Additionally, in July 2024, the EBA published the key topics for supervisory attention across the European Union for issuers of ARTs/EMTs in 2024/2025. Both documents were prepared with a view to promoting the timely and consistent application of MiCA.

Beyond supervisory preparedness, in 2024 the EBA completed preparedness actions for its other tasks under MiCA, specifically regarding its tasks of preparing non-binding opinions on the classification of crypto-assets under MiCA[2], and its task of exercising temporary intervention powers[3].

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[1] The EBA is required to establish this committee pursuant to Article 118 MiCA.

[2] Article 20(5) and 97(3) MiCA.

[3] Article 104 MiCA.

KPIs

	Indicator	Weight	Short description	Target	Achievement
A	Delivery of policy mandates under DORA/MiCA (Output)	30%	Delivery of policy mandates and CP within the legally required timeline	95%	100 % of DORA and MiCA mandates delivered on time.
B	Operational readiness to take up new tasks (Output / Result)	70%	As part of the DORA and MiCA proposals, the EBA should be ready to take up tasks (supervision/oversight and others)	Completion of preparatory work	DORA oversight preparations progressed as planned. MiCA supervision preparations progressed as planned.

Source of information KPI A: EBA WP monitoring tool and publications; KPI C: DORA /MiCA milestones tracker.

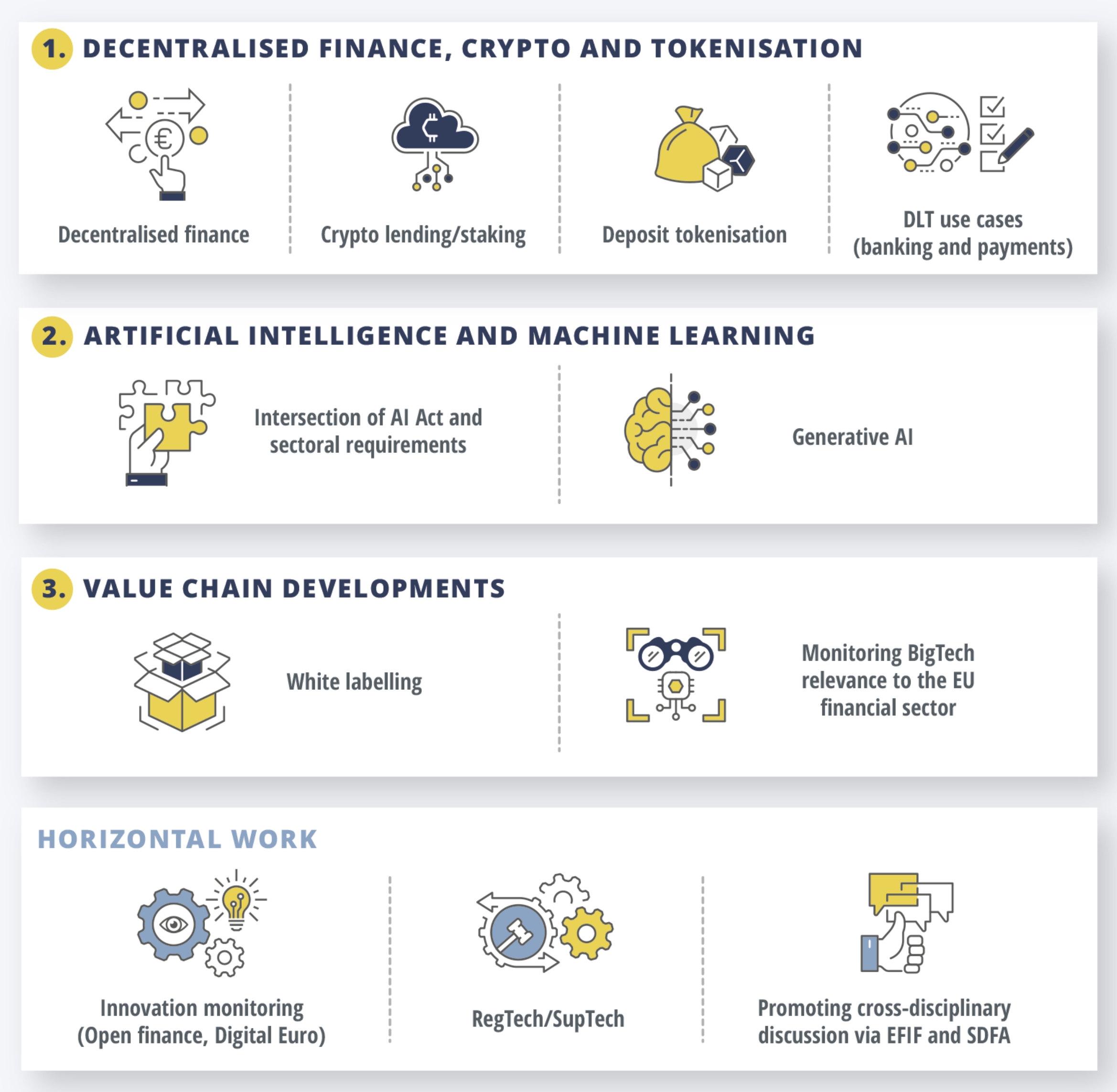
1.1.5 Increasing focus on innovation and consumers (including access to financial services) while preparing for the transition to the new AML/CFT framework

In 2024, the EBA further enhanced the focus on innovation, on the conduct of financial institutions and on consumer protection mandates (including those given by MiCA and the Credit Servicers and Credit Purchasers Directive (CSD)) and also contributed to ensuring that citizens have access to financial and banking services. The authority also worked to strengthen CAs' ability to tackle financial crime across its regulatory and supervisory remit.

INNOVATION

The EBA continued to monitor financial innovation, to identify opportunities and risks, promote knowledge-sharing and capacity-building among supervisors, and identify any areas where specific regulatory or supervisory responses may be needed. Crypto-assets, tokenisation in relation to new financial products and services and decentralised finance and the application of AI/ML in financial sector, as well as digital identity management, digital platforms, supervisory and regulatory technologies (SupTech and RegTech), are examples of innovations that are currently on the EBA's innovation monitoring radar. Keeping a close eye on developments via targeted surveys of industry and CAs, as well as information exchanges with industry, CAs and other EU and international organisations help to identify emerging risks and provide guidance on areas where further work by the EBA may be needed.

Figure 6: Priorities on innovative applications 2024–2025



As part of its innovation monitoring work, the EBA published a factsheet on the uses of distributed ledger technology (DLT) in the EU banking and payments sector. The EBA also published, in December 2024, a report on tokenised deposits which assesses potential benefits and challenges of tokenised deposits, and aims to promote convergence in the classification of such deposits in contrast with EMTs issued by credit institutions under MiCA.

Main findings:

- Very few cases of tokenised deposits have been identified, yet interest from credit institutions appears to be growing.
- Potential benefits include programmability and automation of transfers, while potential challenges include issues relating to consumer protection, operational risk, and the application of the anti-money laundering and countering the financing of terrorism framework.

Regarding crypto-asset market developments, the EBA, jointly with the ESMA, prepared a thematic report on recent developments (published in January 2025) including decentralised finance (DeFi) and crypto-asset staking and lending. This report contributes to the Commission's report to the European Parliament and Council under Article 142 MiCA (the Commission report on the latest developments in crypto-assets).

Main findings:

- DeFi remains a niche phenomenon, with value locked in DeFi protocols representing 4% of all crypto-asset market value at the global level. EU adoption of DeFi, while above the global average, is lower than other developed economies (e.g. the US, South Korea).
- The number of DeFi hacks and the value of stolen crypto-assets has generally evolved in correlation with the DeFi market size. Since flows on decentralised exchanges represent 10% of spot crypto trading volumes globally, DeFi protocols present significant risks of money laundering and terrorist financing (ML/TF).
- The implications of maximal extractable value (MEV) on DeFi markets are widespread in DeFi and negative externalities of MEV would require technical solutions.

Importantly, in 2024 the EBA commenced work regarding the implementation of the EU's AI Act. The EBA commenced an assessment of the interplay between the AI Act and sectoral legislation applicable to the EU banking and payments sector, with a view to informing further mapping, assessment and discussion in 2025, to identify any actions needed to secure regulatory consistency and supervisory convergence. Additionally, the EBA took actions to assess AI Act implications, providing inputs to the Commission to inform the Commission's guidelines on the AI System definition[4] and to support knowledge-sharing among CAs regarding the designation in the Member States of 'market surveillance authorities' for the purposes of the AI Act.

More generally, the EBA continued to monitor adoption of AI applications in the EU banking and payments sector, and assess potential opportunities and risks (including via a workshop in April 2024 on General Purpose AI (GPAI)), publishing its findings in the Autumn Risk Assessment Report.

Earlier in 2024, the ESAs published a joint report with the findings of a stocktake of BigTech's provision of direct financial services in the EU. The report identifies the types of financial services currently carried out by BigTechs in the EU pursuant to EU licences, and highlights inherent opportunities, risks, regulatory and supervisory challenges, and recommends steps to enhance the monitoring of these activities. Additionally, the EBA commenced work on a thematic report (to be published in 2025) on white labelling, as part of its wider efforts to monitor the implications of value chain evolution.

Finally, the EBA, together with the ESMA and EIOPA, further contributed to the European Forum for Innovation Facilitators (EFIF) and guided and steered development of the EU Supervisory Digital Finance Academy (SDFA) training curriculum to ensure it is tailored to the CAs' needs and contributes to the SDFA's aim to strengthen supervisory capacity in innovative digital finance.

CONSUMER PROTECTION

More specifically with regards to consumer protection, the EBA continued its efforts to enhance the monitoring of financial institutions' conduct of retail activities across the authority's regulatory and supervisory remit.

[4] The guidelines were published in February 2025: https://digital-strategy.ec.europa.eu/en/library/commission-publishes-guidelines-ai-system-definition-facilitate-first-ai-acts-rules-application

As a follow-up to the Consumer Trends Report published in April 2023, the EBA undertook a fact-finding exercise on the creditworthiness assessment (CWA) practices of non-bank lenders (NBLs). The exercise, the results of which were published in August, was aimed at gaining insight into the extent to which NBLs contribute to over-indebtedness and arrears. It revealed that, while some NBLs might service segments of the population that may have limited opportunities to access traditional banks for credit, a significant number of the surveyed NBLs appear to apply inadequate practices for information gathering and verification during their CWAs.

Main findings:

The report also found that the lack of a harmonised definition of NBLs and of a harmonised authorisation framework in the EU contribute to different types of NBLs being supervised in different ways across EU Member States. Consequently, different rules apply to entities of a similar kind across the EU.

The EBA will continue monitoring the activities of NBLs through its biennial Consumer Trends Report and, depending on the findings and need, may consider initiating further ad hoc action to foster further protection of EU consumers.

The ESAs published a joint report in July 2024 following their workshop on the use of behavioural insights by supervisory authorities in their day-to-day oversight and policy work. The report provides a high-level overview of the main topics discussed during the workshop held on 14 and 15 February 2024 for national supervisors and other CAs, where participants explored the added value of behavioural insights in their work by exchanging experiences and discussing the challenges they face.

In addition, the authority, in coordination with the ESMA, developed technical standards (published in April 2024) setting out complaints handling procedures for complaints from holders of ARTs and other interested parties (including consumer associations that represent those holders) to issuers of such assets under MiCA – specifying the requirements, templates and procedures for handling complaints received.

In addition, in July, the EBA published final guidelines that extend the existing joint committee guidelines on complaints handling (JC Guidelines) to credit servicers under the new Credit Servicers Directive (CSD), ensuring that, when handling complaints from borrowers, credit servicers are required to apply the same effective and transparent procedures that have been applied for more than a decade to other firms in the banking, insurance and securities sectors. Further reflecting the authority's concerns about simplification, the EBA introduced non-substantive changes in order to align the guidelines with the amendments made to the EBA Regulation in 2020, allowing the EBA to delete procedural requirements, directed towards national authorities, that are no longer required.

In June 2024, the EBA furthermore amended its guidelines on arrears and foreclosure to address the changes introduced in the Mortgage Credit Directive (MCD), following an assessment of the impact of revision of Article 28(1) of the Directive, and concluded that Guideline 4 on 'resolution process' needs to be removed, given that its content had been embedded in E U Law.

Again in the context of the CSD, the guidelines on national lists or registers of credit servicers, published in March 2024 and aimed at CAs managing such lists or registers, specify i) the content of the lists or registers; ii) how they should be made accessible; and iii) the deadlines for updating them. To further enhance transparency for credit purchasers and borrowers, and to establish a level playing field across the EU, the lists or registers should also make it easier for borrowers to access information on complaint-handling procedures offered by CAs.

In accordance with Articles 39(2) and 41(1) MiFIR, the EBA also monitors the market for structured deposits. This mandate, in combination with a Commission request for the EBA to issue recurrent reports on the cost and past performance of structured deposits, led to a report published in July 2024 on structured deposits in the EU. The report highlighted that, in more than half of the 27 national markets in the EU, structured deposits do not exist, and that the EU market remains very small at an aggregate level, with only EUR 16.7 billion of structured deposits sold during the reference period of the report of 1 January to 30 September 2023 – the report's reference period. 95% of these were concentrated in just four EU Member States. These four countries reported increases in the number of products offered and volumes sold, albeit at a very low level. Across the EU, the total value of structured deposits sold in each Member State ranges from EUR 2 million to EUR 10 billion, showing a disparity in market penetration and investor interest.

As regards cost and past performance of structured deposits – covered as per the Commission request – the limited performance data that are available indicate that the annual net returns for structured deposits vary significantly, with some structured deposits offering no return, while others showing positive returns, in one case of up to 24%.

In 2024, the EBA acted as lead organiser of the Joint ESAs' Consumer Protection Day, which took place on 3 October 2024 in Budapest. The event followed the theme of 'Empowering EU consumers: fair access to the future of financial services' and featured three panels covering the topics of AI in financial services, access to consumer-centric products and services, and sustainable finance. Speakers and panellists included leaders from consumer organisations, regulatory authorities, EU institutions, academia, and market participants from across the European Union, with 300 in-person participants and more than 600 viewers online. Highlights from the day were shared publicly later in October.

AML/CFT

Through 2024, the EBA continued to lead, coordinate and monitor the EU financial sector's AML/CFT efforts. As part of this, it continued to set common standards in line with its legal mandate where warranted and necessary, highlighted and acted upon emerging ML/TF risks, and supported the effective implementation of robust approaches to tackling ML/TF, sanctions and other financial crime risk across the EU.

Work to deliver the EBA's mandates in Regulation (EU) 2023/1113 on information accompanying transfers of funds and certain crypto-assets (the Funds Transfer Regulation – FTR) was a particular focus. In 2024, the EBA issued:

- Guidelines on the so-called 'travel rule', i.e. the information that should accompany transfers of funds and certain crypto-assets. These guidelines, which were issued in July 2024, serve to tackle the abuse of such transfers for ML/TF purposes. They updated and replaced guidelines on the travel rule that the EBA had issued in 2017.
- Two sets of guidelines on internal policies, procedures and controls to ensure the implementation of EU and national sanctions. These guidelines, which were issued in November 2024, set out, for the first time, common EU standards on governance arrangements, and on the policies, procedures and controls that financial institutions should have in place to be able to comply with EU and national restrictive measures.
- A public consultation launched in December 2024 on draft technical standards specifying the criteria according to which crypto-asset service providers (CASPs) should appoint a central contact point to ensure compliance with local AML/ CFT obligations of the host Member State. These RTS amend the RTS the EBA had issued previously, by extending their scope to CASPs.

In addition, the EBA worked to include specific provisions on identifying and tackling ML/TF risks in 10 MiCA instruments, and published an 'explainer' to provide a comprehensive overview of the holistic approach to tackling ML/TF risk in crypto to an emerging sector.

The EBA continued to monitor and disseminate information on emerging ML/TF risks and coordinated CAs' actions where necessary to tackle those risks. This included:

- Using the EBA's EuReCA database to inform CAs of risks that were relevant to them concerning individual institutions under their AML/CFT supervision, and concerning their overall approaches to tackling ML/TF risk. For example, submissions suggested that across the EU, ML/TF risks associated with the ineffective use of RegTech solutions were increasing. By the end of 2024, EuReCA contained information on 2 542 material weaknesses and corrective measures concerning 517 institutions submitted by 44 CAs from all Member States.
- Assessing the risks and impact of the use of virtual IBANs (vIBANs) and publishing the findings in a report in April 2024. The report highlighted the lack of a common definition at EU level and divergent approaches, both by CAs and by the industry, which raise challenges not only from an AML/CFT perspective, but also from consumer and depositor protection, authorisation and passporting, and regulatory arbitrage perspectives. The EBA provided recommendations in that respect.
- Hosting meetings of EU supervisors to coordinate actions and ensure a robust approach to tackling crystallised ML/TF risks in individual CASPs. Over the course of 2024, the EBA hosted three such meetings, in addition to advice it also provided on tackling ML/TF risk in specific situations. As a result of the EBA's work, CAs reassessed the fitness and propriety of senior managers and beneficial owners in three cases, and triggered other supervisory actions in seven cases.
- Raising awareness of specific risks it had identified by publishing factsheets for financial institutions on terrorist financing and derisking.

As was the case in previous years, the EBA continued to support the effective implementation of its standards through targeted reviews and training. In 2024, the EBA:

- Completed its reviews of EU/EEA CAs' approaches to tackling ML/TF risk in the banking sector. By December 2024, the EBA had assessed all 40 CAs in the EU and provided them with feedback and recommendations for change where necessary. For the final round of reviews, as set out in a report the EBA published in December 2024, the EBA found that AML/CFT supervisors had taken important steps to implement a risk-based approach to AML/CFT, but that challenges continued to exist in relation to prudential supervision and risk assessments in particular. The EBA will now conduct a final stocktake of all the actions taken by CAs in response to the EBA's recommendations and publish a final report in 2025 as part of the EBA's handover to AMLA.
- Continued to monitor the effective functioning of AML/CFT colleges. The fourth report on the functioning of AML/CFT colleges, which was published in December, highlights that AML/CFT colleges worked well in the period under review, but further progress was necessary in two areas: adjusting the functioning of AML/CFT colleges to specific ML/TF risks to which the underlying firm is exposed, and discussing the need for a common approach or joint action.
- Provided training to 350 staff from CAs on crypto, EuReCA, and on the effective assessment of ML/TF risk.

The EBA worked closely throughout 2024 with CAs and the Commission to prepare for the transition to the EU's new legal and institutional AML/CFT framework. The publication of the new AML/CFT package in June 2024 started a transition period whereby the EBA continues to be responsible for AML/CFT until 31 December 2025 while the new AML/CFT Authority, AMLA, is being set up. As part of this, the EBA has started to prepare the transfer of data, knowledge and powers to AMLA, supported national CAs in their preparatory work to adjust to the new framework, and contributed to safeguarding effective cooperation between prudential and AML/CFT supervisors and regulators in future.

An important aspect of this work relates to the preparation of the EBA's response to a Call for Advice the EBA received from the Commission on 12 March. In this Call for Advice, the Commission tasks the EBA with the preparation of several technical standards that will be key to the new AML/CFT regime. The EBA is due to respond to the European Commission by the end of October 2025. Specifically, the Commission asked the EBA to prepare a common ML/TF risk assessment methodology for AML/CFT supervisors in line with Article 40(2) of the Sixth Anti-Money Laundering Directive (AMLD6) and the methodology that the AMLA will use to select institutions that will be directly supervised by it pursuant to Article 12(7) of AMLA. The EBA's input will also cover customer due diligence aspects under Article 28(1) of AMLR and the criteria that supervisors will use to determine pecuniary sanctions or administrative measures under Article 53(10) AMLD6 and to consider possible guidance on the base amounts for such sanctions under Article 53(11) AMLD6. The EBA organised an industry roundtable in October 2024 to obtain the views of the private sector on these mandates with a view to informing its approach. A consultation was launched in Q1 2025.

KPIs

	Indicator	Weight	Short description	Target	Achievemen t
A	Delivery of mandates conferred in sectoral legislation (Output)	40%	The EBA will deliver on an estimated 20+ mandates conferred under the Markets in Crypto-Assets (MiCA), and the Credit Servicers and Credit Purchasers Directive (CSD)	75%	100%
B	Effective retail conduct supervision to enhance protection of consumers (Result / Impact)	10%	The EBA will take action in response to information provided through retail risk indicators and the EBA's Consumer Trend Reports 2022/2023	1 initiative	1 initiative
C	Policy response and supervisory convergence in financial innovation (Result / Impact)	10%	The EBA will deploy its mandate in monitoring innovation, contributing to a common approach towards new or innovative financial activities, and in providing advice to the co-legislators, by: i) issuing a number of thematic publications, incl. opinions or reports issued to the Commission and NCAs; ii) fostering knowledge-sharing via various platforms (EBA structures, EFIF, SDFA); iii) reviewing and verifying the training curriculum of the SDFA	Up to three initiatives 100% reviewed materials for SDFA	i) and ii) four initiatives (including workshops) iii) Fully achieved

	Indicator	Weight	Short description	Target	Achievement
D	Supporting the effective implementation of the new legal and institutional AML/CFT framework (Output / Result)	40%	The EBA will work closely with AMLA to ensure the smooth transition of powers and effective cooperation between prudential and AML/CFT regulators going forwards.	2 reports	Fully achieved: 2 reports

Source of information KPI A and KPI B: EBA WP monitoring tool and publications; KPI C: EBA WP monitoring tool and report to SDFA; KPI D: EBA WP monitoring tool and EBA transition workplan.

1.2 Additional achievements in 2024

1.2.1 Work on proportionality

Since its creation in 2020, the ACP has been providing recommendations to the EBA on how to foster proportionality in its activities and missions. Its core mandate is to assess the EBA draft WP for the upcoming year and make recommendations to enhance its proportionality. It is also tasked with reviewing how the EBA has addressed its advice.

In 2024, the ACP followed up on its previous recommendations in the areas of Recovery and Resolution, ESG in supervision and regulation, and reporting and transparency, and recommended that the EBA also pay particular attention to proportionality in its work related to payment services, consumer and depositor protection.

The EBA took the recommendations into account in the preparation of these activities, recognising the value of enhancing proportionality where possible.

In the area of Recovery and Resolution, the work on revision of the RTS on resolvability assessments has been ongoing and the EBA engaged extensively on the topic with an aim of reviewing existing EBA products to increase optionality and the development of alternative strategies in the resolvability assessment process, reflecting the ACP's recommendations. Similarly, considering the ACP's advice, EBA has been reviewing the RTS on the content of resolution plans to streamline these plans, simplify them, amend the update frequency and help authorities focus on testing. Furthermore, the EBA's review aimed at standardising resolution planning and a streamlined MREL section of the plan.

Addressing the continuous focus on proportionality in the EBA's work, the EBA has started preparatory work on the inputs for the upcoming review of the SREP Guidelines, in particular regarding the management of ESG risks and transition plans. The simplification of Pillar 3 reporting templates for SNCIs, including the alignment of Pillar 3 disclosures with supervisory reporting, has been progressing throughout 2024, with further work expected in 2025.

The EBA finished implementing the recommendations from the study on the cost of compliance with supervisory reporting (2021), which aimed to reduce compliance costs for institutions by 25%, particularly for small and non-complex institutions. Reducing the overall reporting burden for SNCIs has become an integral part of all the EBA's reporting work and, in addition, the EBA has considered proportionality in all new and amended reporting requirements, not only for SNCIs but also for medium and large institutions. As part of changes resulting from CRR3 and related to liquidity and FINREP, the EBA is also reviewing, existing data points and their relevance. The new JBRC and its units have been working on integrating supervisory, resolution and statistical reporting.

Considering the ongoing legislative discussions on PSD3 and PSR, the EBA actioned the ACP's recommendation on payment fraud prevention, by publishing an opinion with legislative proposals for how to enhance payment fraud rules in April, and an inaugural joint report with the ECB on payment fraud data for 2022 and 2023 in August (see 1.3.4 for details).

1.2.2 Recovery and resolution

The Commission's proposals for a strengthened CMDI framework, issued in April 2023, are aimed at enabling authorities to organise an orderly resolution for failing banks of any size and business model, including smaller players, drawing from lessons learned during the initial years of application of the existing rules. The proposals, to which the EBA has contributed in previous years through responses to various calls for advice, anticipate amendments to the Bank Recovery and Resolution Directive (BRRD), the Deposit Guarantee Schemes Directive (DGSD), and the Single Resolution Mechanism Regulation (SRMR). Whereas the proposals contain requirements for the EBA to issue standards on provisions and to report to the Commission on the framework's effective and harmonised implementation, the uncertainty around the package's finalisation has impacted and delayed the start of work on these resolution and deposit insurance mandates.

Notwithstanding this delay, the EBA worked on a number of related mandates, including one on recovery stemming from MiCA. This work led to the guidelines on recovery plans under MiCA issued in June 2024, which set out the requirements with respect to the format of the recovery plans and the information to be included in those plans, as well as supervisory expectations for issuers to be able to identify and understand the risks they face and formulate possible actions for restoring compliance with regulatory requirements.

In addition, the EBA launched a public consultation on its draft ITS, overhauling the resolution planning reporting framework, with the aim of further harmonising reporting on these plans in the EU and avoiding duplication of data requests, thus reducing institutions' cost of compliance. Proportionality was a key driver of this work and led to a streamlining of datapoints to avoid overlaps based on the size and complexity of institutions.

The objective of the European Resolution Examination Programme (EREP) is to drive convergence. In August 2024, the EBA published its findings on the progress achieved with respect to the priorities set for 2023. The report found that convergence had increased within the EU with regards to resolution planning practices and objectives.

More specifically:

- On MREL, only four banks did not meet their target as of 1 January 2024. RAs have used their powers to impose sanctions and have extended deadlines for 22 institutions. They have also increased their monitoring of MREL eligibility and quality, especially for contracts governed by third country law.
- On the operationalisation of the bail-in tool, most RAs have now published their bail-in mechanisms and take the view that challenges remain concerning the identification of holders of instruments, suspension from trading or requirements for issuing prospectuses for the new instruments, and are particularly prominent in relation to third country stakeholders.
- While some progress has been observed in the area of liquidity in resolution, RAs plan to further increase the intensity of their testing and to challenge the severity of banks' scenarios.
- Finally, RAs have performed more testing of management information systems for valuation, as some banks showed significant gaps in data quality, automation, granularity and timeliness of report delivery.

With the report, the EBA also set three priorities for RAs and banks for 2025: operationalisation of their resolution tools, liquidity strategies in resolution, and management information system for valuation. The 2025 priorities confirm and complement the focus areas set for 2024, given their relevance and the fact that work on those complex topics takes time.

Also with a view to fostering convergence, the EBA worked on a handbook on independent valuers for resolution purposes published in December 2024, with a specific objective of improving the process of selecting independent valuers and of facilitating its implementation by RAs. The handbook provides best practices, high-quality methodologies and processes for the selection and appointment of independent valuers for resolution purposes, gives examples on the application of these methodologies under certain scenarios, and identifies safeguards which could mitigate the effects of a potential conflict of interest hampering the fitness of the valuer.

1.2.3 Depositor protection

Beyond this, the EBA has a statutory obligation to collect data on deposit guarantee schemes (in accordance with Article 10(10) of the DGSD) and has committed to publishing this information annually, to enhance the transparency and public accountability of DGSs across the EEA for the benefit of depositors, markets, policymakers, DGSs and Member States. The 2023 data related to two key concepts and indicators in the DGSD, namely available financial means (AFMs) and covered deposits, were published in May 2024.

Main findings:

- Deposits protected by EU DGS increased by 1.7% to EUR 8.5 trillion between 2022 and 2023, whereas funds available to protect those deposits in case of bank failures rose by 14.9% to EUR 73 billion.
- The high increase in the amount of funds held by DGSs to protect deposits reflects the need for all the DGSs to reach the minimum target level of 0.8% of covered deposits by July 2024.
- As of 31 December 2023, 21 of the 36 DGSs in the EEA had already reached the minimum target level ahead of the deadline.

1.2.4 Payment services

The Commission’s retail payments strategy envisages a single payments market which fully leverages innovation and benefits its citizens and firms. The Commission’s June 2023 proposals for a revised Payment Service Directive (PSD3), a Payment Services Regulation (PSR) and a Regulation on Open Finance (FIDA) built on technical advice provided by the EBA and contained requirements for the authority to issue standards on provisions and to report to the Commission on the framework’s effective and harmonised implementation. Here again, the finalisation of the package was delayed and this has impacted the start of the work on approximately 35 mandates to be delivered in the coming years.

Notwithstanding the above delay, the recently enacted Instant Payments Regulation (IPR) led to follow-up work for the EBA, beyond the mandates the authority is expected to deliver under PSD3/PSR and FIDA in 2025/26.

One particularly urgent mandate in this context was the draft ITS on the reporting of data on charges for credit transfers and payment accounts, and shares of rejected transactions. The ITS were finalised in December 2024 and published in early February 2025. The ITS, which deliver on the mandate in the IPR amending the SEPA Regulation, aim to standardise reporting from banks, payment institutions and e-money institutions (i.e. Payment Service Providers – PSPs) to their national CAs. The reported data will help to ensure consumers benefit from access to instant credit transfers, and that the latter are no longer more expensive than regular credit transfers. Following the comments received from external stakeholders during the public consultation on the draft ITS in Q3 of 2024, the EBA decided to postpone the first harmonised reporting from PSPs by 12 months, from April 2025 to April 2026. This enables the Commission to adopt the EBA’s final draft ITS, and the EBA to develop the taxonomy, datapoint model and validation rules, which the industry then needs to implement.

Straddling the EBA’s mandates on consumer protection and contributing to market confidence in payment services is the EBA’s monitoring of payment fraud. In an opinion published in April 2024, the authority assessed recent payment fraud trends and identified new types and patterns of payment fraud. The opinion therefore sets out several recommendations addressed to the EU institutions on how EU law could be further changed to mitigate them. The opinion therefore aims to further strengthen the forthcoming legislative framework under the Third Payment Services Directive (PSD3) and PSR, as these legal texts will enshrine anti-fraud requirements for several years to come and need to be as future-proof as possible.

Main takeaways:

- Regulatory measures such as the Strong Customer Authentication (SCA) which the revised Payment Service Directive (PSD2) and the EBA’s Technical Standards have imposed on the payments industry have been successful in achieving the aim of significantly reducing fraud that involves stealing customers’ credentials.
- Fraudsters have adapted their techniques and are using more complex types of fraud, such as those based on what is commonly referred to as ‘social engineering’.
- To mitigate these dynamic new fraud types, and to action one of the recommendations of the EBA’s Proportionality Committee (see 1.3.1 above), the EBA issued an opinion addressed to the EU institutions proposing that new security measures be prescribed in the forthcoming PSD3/PSR, in addition to those already articulated in the Commission’s proposals and the provisions that recently entered into force through the IPR.

Further in the area of payment fraud, the EBA and the ECB published a joint Report in August. The report assesses payment fraud reported by the industry across the European Economic Areas (EEA), confirms the beneficial impact of Strong Customer Authentication had on reducing payment fraud, but also found that fraud in the EU still amounted to EUR 4.3bn in 2022 and EUR 2.0bn in the first half of 2023.

1.2.5 Equivalence

As a core instrument to foster the EBA’s international relations, the EBA continued to engage with authorities and jurisdictions globally for assessments of equivalence.

Assessments of the equivalence of confidentiality and professional secrecy regimes of non-EU regulatory and supervisory bodies continued to support the operation of the supervisory college. In 2024, the EBA exchanged with the National Financial Regulatory Administration (NFRA) of China to confirm the equivalence of its professional secrecy and confidentiality regime, as established under its institutional predecessor. The EBA also began additional assessments on the equivalence of confidentiality and professional secrecy provisions in the context of anti-money laundering and digital operational resilience.

The EBA continued to assess the regulatory and supervisory provisions of non-EU countries with the EU framework by providing opinions to the Commission.

Finally, the EBA assessed regulatory and supervisory developments in non-EU jurisdictions which had been assessed as equivalent. The findings of this monitoring exercise are conveyed in a confidential report to the Commission, the Council of the EU and the European Parliament.

1.2.6 Supervisory convergence and independence

The EBA’s activities that contributed to strengthening supervisory convergence range from laying down guidelines and best practices, active participation in colleges of supervisors, and organising dedicated training, performing peer reviews and other EBA independent assessments aimed at evaluating the degree of convergence. One of the EBA's key tasks is to promote convergence in supervisory practices to a high standard, to ensure that regulatory and supervisory rules are implemented equally across all Member States. Convergent supervisory practices are indeed fundamental to achieving consistent outcomes and a truly level playing field, which are the basis of the single market.

Some of the activities in relation to supervisory convergence have already been discussed under Sections 1.1.1, 1.1.4, 1.1.5. and 1.3.3.

PEER REVIEW

The aim of the EBA in conducting peer reviews is to further strengthen consistency in supervisory outcomes and to facilitate the identification of supervisory best practices across CAs. Peer reviews can cover, among others, regulations, procedures, enforcement powers and practices. Follow-up measures may be adopted in the form of guidelines and recommendations. Under the amended Article 30 of the EBA Founding Regulation, the EBA must conduct peer reviews of some or all of the activities of CAs in accordance with the two-year EBA work plan.

In continuation of the practice begun in 2023 of undertaking more peer reviews, the EBA carried out three peer reviews in 2024 plus one follow-up peer review (this practice follows a suggestion from the 2020 ESAs review). In addition, the EBA peer review work plan for 2023 to 2024 was designed to support the EBA's priorities and address current risks. In 2024, the EBA carried out the following peer review reports:

- Peer review – Definition of default (DoD) application, published in July 2024;
- Peer review – Proportionality in the application of SREP, published in early January 2025;
- Peer review – Action plan on dividend arbitrage trading schemes ("Cum-Ex/Cum-Cum"), published in early February 2025.

In terms of follow-up reports, the EBA covered the following peer reviews:

- Follow-up report on the peer review on the supervision of the management of non-performing exposures, published in November 2024

The follow-up to the peer review report on ICT risk assessment under the SREP has been postponed to 2025 (for delivery in early 2026). Similarly, the follow-up on 2022 EBA Peer Review on the authorisation of PIs and EMIs under PSD2 has been rescheduled to 2025.

1.3 Engaging with stakeholders

In 2024, the EBA continued to maintain and build strong relationships with its external stakeholders. Over the past year, the EBA has engaged with a broad spectrum of external stakeholders from the public and private sector, including other EU institutions and agencies, CAs in EU Member States, international organisations and regulators and supervisors outside of the EU, as well as industry and non-profit organisations.

EU INSTITUTIONS

As part of an EU agency's accountability, the EBA Chairperson presented the EBA's key achievements to the European Parliament Economic and Monetary Affairs Committee. The EBA also took part in the public exchange of views with Members of the European Parliament on the FRTB.

In addition, the EBA's senior management has built and maintained relationships with the incoming leadership of the European Parliament following the European elections. Dialogue has also continued with the alternating Council of the EU Presidencies and with the Commission, and with the Directorate-General for Financial Stability, Financial Services and Capital Markets Union in particular.

Beyond this, the EBA strengthened its relationship with other EU institutions such as the ECB, ESRB and SRB. Moreover, the EBA and the ESM established stronger collaboration among senior management and on a technical level.

INTERNATIONAL COOPERATION

The EBA continued strengthening its international relationships with regulators and supervisors at institutional meetings and by engaging in bilateral cooperation with third countries. The EBA contributed to the work of the Basel Committee in an observer capacity to safeguard the international banking system and strengthen the global regulatory framework and supervision.

To step up dialogue and foster supervisory effectiveness across borders, the EBA teamed up with ECB to jointly host jointly the first international conference on supervisory convergence and cooperation of its kind. The event took place on 3–4 September 2024 at the ECB premises in Frankfurt. The in-person event welcomed over 150 senior officials over the two-day conference in a bid to explore the multiple dimensions of supervisory cooperation and the current challenges for which supervisory cooperation across borders and sectors is needed.

The joint ECB-EBA conference served as a platform to discuss various dimensions of supervisory cooperation. In particular, panellists and speakers traced back the long journey towards enhanced supervisory cooperation in the EU and internationally. Today's more globally interconnected financial system offers new opportunities to improve supervisory processes, information and communication while additional challenges also emerge. The specific supervisory challenges to cooperation in light of digitalisation, the green transition and NBFI have also been discussed. Overall, transparency between supervisors and banks remains an essential element for maintaining trust and facilitating cooperation within the EU as well as at an international level.

The conference embodied the spirit of global supervisory cooperation by bringing together representatives from supervisory authorities, EU institutions, central banks, the financial services industry, and other relevant stakeholders both from within and beyond the EU, with representatives from as far afield as the US, India and Singapore.

Finally, the EBA also engaged in bilateral regulatory and supervisory cooperation with third countries.

MEMBER STATES

Building on continuous cooperation with CAs, the EBA's senior management also held dedicated country visits to European Member States to discuss regulatory and supervisory priorities with a wide array of stakeholders. In 2024, these events took place in Austria, Germany, Hungary, Ireland and the Netherlands.

INDUSTRY AND NON-PROFIT ORGANISATIONS

The entire EBA staff continued their dialogue with the private sector by organising hearings, attending high-level conferences and meeting bilaterally and through speaking events with industry representatives, consumer associations, academics and students. The EBA publishes a comprehensive overview of staff meetings with external stakeholders, including organisation and participant names.

Furthermore, the EBA continued answering stakeholders' questions about the Single Rulebook submitted via the Q&A tool. In 2024, 329 questions were submitted and 90 were answered.

Figure 7: stakeholder engagement in figures

1.4 Mapping deliverables by activity against the WP

This mapping of deliverables is based on the tables (Section 2) on the EBA 2024 WP with the main outputs for each activity and compares planned against actual outcomes.

1.4.1 Policy and convergence

Activity 1: Capital, loss absorbency and accounting **Contributing to VP 1 – directorate PRSP, unit LILLAC**		**Target**	**Actual**
Ongoing activities	*Capital and loss absorbency* • Maintenance of the EBA CET1 list and update of the CET1 report under article 80 CRR • Monitoring of – and report on – CET 1, AT 1 and T2 issuances (including for ESG purposes) • Analysis of interactions within loss absorbency requirements • Support on Q&A on capital and eligible liabilities instruments • Monitor of – and report on-- TLAC/MREL eligible liabilities issuances under Article 80 CRR, as well as for ESG purposes • Follow up implementation of the EBA Opinion on legacy instruments (in particular in the context of the CRR II grandfathering provisions) • Follow-up implementation of RTS on own funds and eligible liabilities (permission regime in particular) • Monitor the impact of the interest rate environment on own funds and eligible liabilities aspects (e.g. on the valuation of non-equity instruments) • Findings on stacking order and capital buffers *Accounting and Audit* • Monitor and promote consistent application of IFRS 9 and work on the interaction with prudential requirements • Continue work on the modelling aspects of IFRS 9 and their related impact on capital, using a benchmarking exercise, as per the roadmap for IFRS 9 deliverables[5] supporting proper appropriation by supervisors and integration in the general benchmarking exercise • Monitor the quantitative impact of the application of IFRS 9 through selected indicators • Continue working on / monitoring consolidation aspects • Monitor accounting standards and comment letters to the International Accounting Standards Board, where needed • Deliver regulatory products and technical advice requested by the Commission	-	-

[5] https://eba.europa.eu/sites/default/documents/files/documents/10180/2551996/ccbf23ae-4b1a-4af7-bb5e-44d51ae58dfb/Roadmap%20for%20IFRS%209%20deliverables.pdf?retry=1

	• Monitor the impact of the changes of the interest rate environment on accounting related aspects • Support on QA on accounting and consolidation		
Output as per 2024 WP	*Capital and loss absorbency* • Updated monitoring reports (CET1, AT1, TLAC/MREL) as far as needed, also depending on market developments	TBC	Q2, Q4*
TBC / postponed	*Accounting and audit* • Preparation of the report to the EU Commission on completeness and appropriateness of provisions on consolidation • Update RTS on Own funds and eligible liabilities and RTS on methods of consolidation, where needed, depending on CRR III amendments • Guidelines specifying the activities that are a direct extension of banking, activities ancillary to banking, and similar activities	TBC	TBC** TBC*** TBC****
Additional output	• Targeted report on stacking order and capital buffers	-	Q3*****

* Outputs Updated Report on AT1, T2 and TLAC/MREL in June, updated CET1 list in December.

** Planning was adjusted and although work was launched in 2024, output expected to be provided in 2025 in accordance with the legal deadline for the CRR3 mandate.

***Update was not deemed necessary in 2024 and will be reconsidered in 2025.

**** Delivery of GL updated to 2026 in accordance with legal deadline for CRR3 mandate for Guidelines on the definition of ancillary service undertakings.

*****The findings informed work on mandate on the interplay between the output floor and Pillar 2 (Art 104a(7) CRD VI) where the EBA published an opinion in January 2025; this is to be reflected in the SREP GL which will be reviewed in 2025.

Activity 2: Liquidity, leverage, and interest rate risk **Contributing to VP 1 – directorate PRSP, unit LILLAC**		**Target**	**Actual**
Ongoing activities	*Liquidity risk* • Deliver regulatory products and update reporting liquidity requirements as needed • Monitor national practices on liquidity and national options and discretion, in particular monitoring the concrete implementation of the liquidity coverage ratio (LCR) rules and definitions • Monitoring of – and report on - LCR implementation • Monitoring of interdependent assets and liabilities for the net stable funding ratio (NSFR) under Art. 428f of the CRR • Monitoring of interdependent assets and liabilities for the LCR under Art. 26 LCR DA • Monitoring of notifications related to liquidity and follow-up actions	-	-

Activity 2: Liquidity, leverage, and interest rate risk Contributing to VP 1 – directorate PRSP, unit LILLAC		Target	Actual
	• Update the list of credit institutions exempted from the 75% inflow cap under Article 33(5) of the LCR Delegated Act • Support Q& on liquidity risk *Leverage ratio* • Monitor/promote consistent application (incl. notifications and follow-up actions), update requirements as needed • Support Q&As on leverage ratio *Interest rate risk in the banking book* • Monitoring of the implementation of the RTS and GLs related to IRRBB and follow up on scrutiny plans • Support Q&As on IRRBB		
Output as per 2024 WP	*Interest rate risk in the banking book* • Possible updates of the regulatory products and any additional supervisory guidance as needed following the scrutiny plans and implementation of the regulatory package on IRRBB	TBC	Q1 2025*

* Report on IRRBB heatmap implementation of short/medium term objectives prepared in 2024 and published in early 2025. This report provides an update on the heatmap published in January 2024 which had included been in the 2023 annual report.

Activity 3: Credit risk (incl. large exposures, loan origination, NPLs, securitisation) Contributing to VP 1 – directorate PRSP, unit RBM		Target	Actual
Ongoing activities	• Support the implementation of the Basel III credit risk framework in EU and deliver Basel III-related and other CRR/CRD mandates in accordance with the EBA Roadmap on CRR III / CRD VI. *Credit risk* • Maintain credit risk-related lists, including lists identifying the eligibility of public-sector enterprises and regional governments for the credit risk framework, and mapping of ECAIs • Monitor and promote the consistent application of credit risk and credit risk modelling, including the implementation of the IRB roadmap and possible revisions due to CRR III / CRD VI *Loan origination* • Monitor the implementation of the EBA's loan origination GL *Non-performing loans (NPLs)* • *Follow up on the work and mandates in the NPL directive +* • Follow up on the EU action plan for tackling NPLs in Europe *Securitisation and covered bonds*	-	-

	Activity 3: Credit risk (incl. large exposures, loan origination, NPLs, securitisation) **Contributing to VP 1 – directorate PRSP, unit RBM**	**Target**	**Actual**
	• Monitor market development and promote the consistent application of frameworks on securitisation and covered bonds • Implement the Covered Bonds Directive, including monitoring reports • Support on Q&A on credit risk, large exposures, and securitisation and covered bonds		
Output as per 2024 WP	*Credit risk* • 2023 Benchmarking report on IRB models	Q1	Q1
	Credit risk • *Preparation of 2025 benchmarking portfolios – update of ITS (including aspects related to IFRS9) +* • *Peer review on definition of default +*	Q2	Q3* Q3*
	Credit risk • GL on ADC (acquisition, development, construction) exposures to residential property Article 126a specifying the terms substantial cash deposits, appropriate amount of obligor-contributed equity, significant portion of total contracts and substantial equity at risk – CP • Deliver according to roadmap provided once the negotiations are finalised • RTS on criteria that institutions shall assign to off-balance sheet items and UCC – CP	TBC	Q2 ** Q1
Delayed delivery	*Credit risk* • Follow-up on peer review on NPEs		Q4***
Postponed/ on hold	*Credit Risk* • GL on calculation of K IRB for dilution and credit risk • GL specifying the methodology institutions shall apply to estimate IRB-CCF – CP *Securitisation and covered bonds* • Monitoring report on capital treatment of STS synthetics • Monitoring report on collateralisation practices • Call for advice (CfA) on revision of covered bonds directive – preparatory work	Q2 TBC Q1 Q1 TBC	**** ***** ****** ****** *******
Additional output	*Credit risk* • Report on report on the eligibility and use of policy insurance as credit risk mitigation techniques		Q4**

Activity 3: Credit risk (incl. large exposures, loan origination, NPLs, securitisation) Contributing to VP 1 – directorate PRSP, unit RBM		Target	Actual
	• Banking Package statement on IRB		Q3
	• Guidelines to specify proportionate diversification methods for retail definition – CP		Q2**
	• RTS to specify the conditions for assessing the materiality of the use of an existing rating system for other additional exposures and changes to rating systems under the IRB approach – CP	-	Q4**
	• ITS on joint decision process for internal model authorisations under Art 20(8) CRR – CP		Q3**
	• RTS to specify the term 'equivalent legal mechanism' in place to ensure that the property under construction will be finished within a reasonable time frame		Q2**

+ Tasks marked with a + were possible candidates to be postponed, cancelled or undertaken with less intensive resource input.

* Slightly late delivery compared to original planning.

** Detail of mandates specified under additional output.

*** Late delivery late compared to original planning due to adjusted planning.

**** Work deprioritised and on hold due to resources constraints. Mandate not subject to legal deadline.

***** Delivery of GL updated in accordance with legal deadline for CRR3 mandate.

****** Work deprioritised due to resources constraints and EC request to work on JC Report on securitisation framework under Art 44 SECR.

******* It was decided to deliver the full call for advice in a single package, which will be published in Q2/Q3 2025.

Activity 4: Market, investment firms and services, and operational risk Contributing to VP 1 – directorate PRSP, unit RBM		Target	Actual
Ongoing activities	• Regular updates to the list of diversified stock indices, including any additional relevant indices and applying the ITS quantitative methodology • Monitor and promote consistent application of market risk requirements, including the finalisation of phase IV in the EBA roadmap on the implementation of FRTB in EU • Support the implementation of the Basel III market risk, CVA and CCR framework, and operational risk in the EU • Delivery of Basel III-related and CRR/CRD mandates as regards FRTB, CVA, CCR and securities financing transactions • Monitor and promote the consistent application of operational risk and investment firms' requirements • *Work on market infrastructures (EMIR/CSDR-related)+* • Support on Q&A on market risk, market infrastructure and CCR, operational risk, and investment firms	-	-

Activity 4: Market, investment firms and services, and operational risk **Contributing to VP 1 – directorate PRSP, unit RBM**		**Target**	**Actual**
Output as per 2024 WP	*Market risk*		
	• 2023 benchmarking report on market risk models	Q1	Q2*
	Investment Firms		
	• GL on group capital test	Q1	Q2*
	Market risk		
	• *Preparation of the 2025 benchmarking portfolios – update of ITS +*	Q2	Q3*
	• RTS on material extensions and changes under the IMA		Q2
	• RTS on extraordinary circumstances for being permitted to continue using the IMA		Q2
	• RTS on extraordinary circumstances for being permitted to limit the backtesting add-on		Q2
	Operational risk		
	• RTS on the elements to calculate the Business Indicator components (BIC) – CP	TBC	Q1 **
	• RTS on adjustments of the BIC – CP		Q1 **
	Market risk		
	• RTS on FX and commodity risk in the BB		Q3
	• RTS on assessment methodology for market risk		2023
	• RTS on assessment of risk factor modellability under the IMA		Q3
	• RTS on backtesting and P&L Attribution test (PLA)		Q3
	CRR III / CRD VI Roadmap		
	• Deliver according to roadmap provided once the negotiations are finalised		***
Postponed/ on hold	*Market risk*		
	• GL on the meaning of exceptional circumstances for the reclassification of a position	Q2	****
	Investment Firms		
	• Call for Advice on IFD/IFR	Q4	*****
	Operational risk		
	• RTS establishing a risk taxonomy of OpRisk loss events	Q4	******
	• ITS on mapping Business Indicator components (BIC) to FINREP	Q4	******
	• RTS on calculation of aggregated losses above 750k and unduly burdensome exemption	TBC	******
Additional output	*Market risk*	-	

Activity 4: Market, investment firms and services, and operational risk Contributing to VP 1 – directorate PRSP, unit RBM		Target	Actual
	• No action letter boundary between the banking book and the trading book		Q1
	• RTS on extraordinary circumstances for Prudent Valuation – CP		Q1*******
	• RTS on supervisory delta for commodity prices, mapping of derivative transactions to risk categories, SA-CCR		Q2 ***
	• RTS on conditions not to count overshootings		Q2 ***
	• RTS on CVA risk for SFTs – CP		Q3***
	• RTS on Structural FX and ITS on reporting on these positions – CP		Q4***
	• RTS on the specification of long and short positions		Q4 ***
	• RTS on conditions to determine that an instrument is a hedging position (residual risk add-on (RRAO) exemption)		Q4 ***
	Operational risk		
	• RTS on the adjustments to the loss dataset – CP		Q2***

* Slightly late delivery compared to original planning.

** CP delivered in Q2. Delivery of final draft technical standards in accordance with legal deadline for CRR3 mandate.

*** Detail of mandates specified under additional output.

**** Mandate deliberately delayed, as a result of delay of FRTB implementation; CRR3 changes trading book boundary.

***** Discussion paper published in Q2 to seek industry involvement. Delivery of final response to call for advice now foreseen for Q2 2025.

****** Delivery of technical standards adjusted in accordance with legal deadline for CRR3 mandate. CPs delivered in 2024.

******* CP published in Q1 2024 but put on hold as a result of delay of FRTB implementation.

Activity 5: Market, governance, supervisory review and convergence Contributing to VP 1 – directorate PRSP, unit Supervisory Review, Recovery and Resolution		Target	Actual
Ongoing activities	• Support to Basel and FSB work • Monitor and promote consistent application of internal governance and remuneration requirements under CRD and IFD • Q&A on market access, internal governance and remuneration, supervisory review • Together with the other European Supervisory Authorities, establishment of a system for exchange of information regarding fit & proper assessments (Article 31a ESAs Regulation)	-	-
Output as per 2024 WP	*Internal governance and remuneration* • Report on the application of gender neutral remuneration polices by banks (CRD) – initially envisaged in 2023	Q2	Q3*

Activity 5: Market, governance, supervisory review and convergence Contributing to VP 1 – directorate PRSP, unit Supervisory Review, Recovery and Resolution		Target	Actual
	• Report on the application of gender-neutral remuneration policies by investment firms (IFD) – initially envisaged in 2023		Q3*
	• GL on the assessment of adequate knowledge and experience of the management or administrative organ of credit servicers under CSD		2023**
	SREP and supervisory convergence		
	• Report on Convergence of Supervisory Practice and on colleges in 2023 (including European Supervisory Examination Programme)		Q3*
	• 2025 European Supervisory Examination Programme		Q3*
	SREP and supervisory convergence • *Report on the application of waivers for remuneration requirements (CRD) + – initially envisaged in 2023 +*	Q3	Q3
	Internal governance and remuneration		
	• Report on gender pay gap (Article 75 CRD)	Q4	Q1 25 ***
	• Report on Benchmarking and High earners (CRD and IFD) +		Q4 ****
	• JC Guidelines on fit and proper exchange of information		Q4*****
	CRR III / CRD V • Deliver according to roadmap provided once the negotiations are finalised	TBC	******
Delayed delivery	*Internal governance and remuneration* • Report on High earners (annual, CRD and IFD) - 2022 data	2023	Q2
	SREP and supervisory convergence • Peer review on proportionality in the application of the SREP	Q3	Q1 25 *******
Postponed / on hold	*SREP and supervisory convergence* • Follow-up on peer review on ICT risk	Q3	********

+ Tasks marked with a + were possible candidates to be postponed, cancelled or undertaken with less intensive resource input.

* Slightly late delivery compared to original planning. NB: The assessment on the application of gender-neutral remuneration polices by banks for the CRD and IFD were provided in one report.

** GL delivered already in 2023.

*** Delivery of this report took place in Q1 2025 together with the report on remuneration benchmarking.

**** High earners data delivered in Q4 with 2023 data in the form of a dashboard. Remuneration benchmarking report provided in Q1 2025 together with report on gender pay gap.

*****JC Guidelines had not been listed in the published Work programme 2024.

****** Delivery of relevant mandates updated to follow deadlines.

******* Late delivery compared to original planning due to conflicting priorities with other mandates dealt with within the team of experts.

******** Delivery updated to after publication of the CP of the SREP GLs (foreseen for Q3 2025) as this review was part of the follow up actions of the peer review.

Activity 6: Recovery and resolution Contributing to VP 1 and 2 – directorate PRSP, unit Supervisory Review Recovery and Resolution		Target	Actual
Ongoing activities	• Work on recovery and resolution planning (including review of plans, operationalisation of resolution tools, resolvability assessment…) • Monitoring convergence in the area of resolution • Q&A on BRRD-related issues	-	-
Output as per 2024 WP	• Report on convergence in the area of resolution		Q3
	• Review of the Handbook on valuation	Q3	Q4*
	• 2025 European Resolution Examination Programme		Q3
	• Quantitative report monitoring the build-up of MREL resources in the EU	Q4	Q1**
Postponed/ on hold	• Handbook on crisis simulation exercise	Q4	***

* Late delivery compared to original planning. Work not subject to legal deadline.

** From 2024 information delivered in the form of dashboard as part of EBA Risk dashboard.

*** Timeline reviewed due to resources constraints within the team of expertise.

Activity 7: ESG in supervision and regulation Contributing to HP 1 – lead directorate ERA, lead unit ESG Risks		Target	Actual
Ongoing activities	• Deliver on the EBA Roadmap on sustainable finance • Fulfil the sustainable finance-related mandates received in EU regulations/directives • Responses to the Commission's requests to provide reports and advice on sustainable finance-related topics • Support for implementation of requirements, (in particular contributing to joint ESAs work on mandates under SFDR) • Support on Q&As on ESG issues • Building up ESG risk assessment and monitoring tools	-	-

Activity 7: ESG in supervision and regulation Contributing to HP 1 – lead directorate ERA, lead unit ESG Risks		Target	Actual
	• Contributing to European and international activities in this area (including Platform on Sustainable Finance, BCBS Taskforce on Climate Related Risks, NGFS)		
Output as per 2024 WP	• Call for Advice (CfA) on greenwashing – final report	Q2	Q2
	• Annual report under Article 18 SFDR	Q3	Q4*
	• Pillar 1 follow-up report (pending CRR III mandate and deadline) – in the form of the Report on data availability and feasibility of common methodology for ESG exposures	Q4	Q1 25**
	• Guidelines on ESG risk management	TBC	Q1 25***
Additional output	• Joint ESAs opinion on the review of SFDR	-	Q2

* Joint ESAs products, slightly late delivery of outputs.

** Delivery of report in Q1 2025 to allow for broadened analysis.

*** Delivery 1 year ahead of the legal deadline (Q1 2026).

Activity 8: Innovation and FinTech Contributing to VP 4 – lead directorate ICC, lead unit DF		Target	Actual
Ongoing activities	• Contribute to and foster common regulatory/supervisory approaches in digital finance topics (e.g. AI, supervisory technologies (SupTech), crypto-assets, distributed ledger technology, legislative initiatives related to other digital finance topics) through knowledge-sharing and awareness raising activities with EU and national competent authorities via the EBA FinTech Knowledge Hub (workshops, roundtables, seminars) and the European Forum for Innovation Facilitators (EFIF) • Activities based on work program of the EFIF for 2024 • Activities related to the EU Supervisory Digital Finance Academy	-	-
Output as per 2024 WP	• Follow up work related to the financial innovation priorities including tokenisation and DeFi, application of AI/ML in financial sectors, digital identities managements, including by clarifying supervisory expectations on specific use cases, where deemed necessary.*	Q4	Q2 24-Q1 25*

* Factsheet on DeFi Q2 2024; RAR special feature on AI/GPAI Q4 2024; Report on tokenised deposits Q4 2024; Report (joint EBA-ESMA) on recent developments in crypto-asset markets (DeFi, lending and staking) Q1 2025, accompanied by 2 factsheets.

Activity 8 continued – DORA **Contributing to VP 4 – lead directorate ICC, lead unit DF**		**Target**	**Actual**
Ongoing activities	• Set-up of oversight function under DORA and preparation of supporting documentation and processes • Set-up of other tasks under DORA, such as incident reporting and financial cross-sector exercises • ESRB Recommendation on EU-SCICF A(2) – mapping and analysis of impediments, legal and other operational barriers for the development of the EU-SCICF	-	-
Output as per 2024 WP	• RTS on specifying the elements and components of ICT risk management framework • RTS on simplified ICT risk management framework • RTS to specify the policy on ICT services • RTS on criteria for the classification of ICT-related incidents	Q1	Q1*
	• RTS to specify threat led penetration testing aspects • RTS to specify elements when sub-contracting critical or important functions • RTS on specifying the reporting of major ICT-related incidents • Guidelines on the aggregated annual costs and losses caused by major ICT incidents • ESRB recommendation on EU-SCICF A(1) – gradual development of pan-European systemic cyber incident coordination framework • GL on cooperation between ESAs and CAs regarding the structure of the oversight • RTS to specify information on oversight conduct ** • RTS on Joint Examinations Teams (DORA) **	Q3	Q3
Delayed delivery	• Feasibility report for centralisation of incident reporting through an EU Hub	Q3	Q1 25***

* Delivery of mandates already reported in 2023 Annual report.

** The mandate to develop RTS to specify information on oversight conduct was split into two separate RTS.

*** Delivery late compared to original planning, but in accordance with the legal deadline of mandate.

Activity 8 continued – MiCAR **Contributing to VP 4 – lead directorate ICC, lead unit DF**		**Target**	**Actual**
Ongoing activities	• Monitor crypto-asset markets and developments and assisting EC for any follow up work related to MiCAR review • Set-up of supervisory function under MiCAR and preparation of supporting documentation and processes. • Set-up of other tasks under MiCAR, such as classification of crypto-assets and product intervention powers	-	-

Activity 8 continued – MiCAR **Contributing to VP 4 – lead directorate ICC, lead unit DF**		**Target**	**Actual**
	• Promote convergence of authorisation and supervision practices through a dedicated Coordination Group		
Output as per 2024 WP	• RTS on the approval process for white papers for ARTs issued by credit institutions	Q2	Q2
	• RTS on information to be submitted in an application for authorisation to issue ARTs		Q2
	• ITS on information to be submitted in an application for authorisation to issue ARTs		Q2
	• GL suitability members of the management body and qualifying holdings (issuers of ARTs and CASPs) (joint mandate with ESMA)		Q2
	• RTS on use of ARTs and EMTs referencing a non-EU official currency as a means of exchange		Q2
	• ITS on use of ARTs and EMTs referencing a non-EU official currency as a means of exchange		Q2
	• RTS to specify requirements, templates and procedures for handling complaints by issuers of ARTs		Q1
	• RTS conflicts of interest		Q2
	• GL on the minimum content of governance arrangements for issuers of ART		Q2
	• RTS on minimum content of governance arrangements on the remuneration policy for issuers of significant ART		Q2*
	• RTS own funds and stress testing		Q2
	• RTS liquidity (reserve assets ARTs)		Q2
	• RTS highly liquid financial instruments		Q2
	• RTS acquisitions of qualified holdings (QHs)		Q2
	• RTS supplemental requirements for issuers of significant ARTs		Q2
	• GL stress testing		Q2
	• GL on recovery plans		Q2
	• GL on redemption plans		Q2
	• RTS supervisory colleges		Q2
	• GL on classification of crypto-assets (joint ESA mandate) • GL to address reporting gaps under MiCAR (own initiative)	Q4	Q4
Additional output	• Supervisory handbook on the supervision of ART/EMT issuers	-	Q3
	• EBA statement regarding expectation for issuers and offerors of ART/EMT to comply promptly with MiCAR and reminder for consumers of risks		Q3
	• Priorities for ART/EMT issuers supervision – 2024/2025		Q3

Activity 8 continued – MiCAR Contributing to VP 4 – lead directorate ICC, lead unit DF		Target	Actual
	• EBA Decision concerning the process for the adoption of opinions under Article 20(5) and Article 97(3) of MiCAR		Q4

* Mandate not listed in published Work programme 2024.

Activity 8A: DORA oversight / MiCAR supervision Contributing to Priority 4			
Ongoing activities	• Carrying out DORA oversight activities in accordance with the oversight plan • Carrying out MiCAR supervisory activities in accordance with the supervision plan	-	1. -
Additional output	*DORA Oversight* • Finalising DORA oversight governance (establishment of the Oversight Forum and Joint Oversight Network) • Reporting Decision and technical package published in support of the collection of registers of information for CTPP designation • Progressing the development of methodologies, arrangements and processes to support the DORA oversight *MiCAR Supervision* • EBA Decision EBA/DC/558 concerning the Procedure for the classification of ART and EMT as significant and the transfer of supervisory powers • Feasibility assessment of data collection from issuers of ART/EMT under MiCAR • Progressing the development of methodologies, arrangements and processes to support the MICA supervision	-	Q4 Q4 Ongoing Q3 Q4 Q4

Activity 9: Payment services, consumer and depositor protection Contributing to VP 5 – directorate ICC, unit Conduct, Payment and Consumers		Target	Actual
Ongoing activities	*Payment services* • Q&As on PSD, EMD, and IFR • Support the EU Commission, EU Council and EU Parliament during the negotiations of the revised PSD3/PSR and monitor evolution of mandates foreseen for the EBA *Depositor protection* • Monitor liquidations in the EU with a DGS pay-out • Assessment of notifications received under DGSD	-	-

Activity 9: Payment services, consumer and depositor protection Contributing to VP 5 – directorate ICC, unit Conduct, Payment and Consumers		Target	Actual
	• Monitor the negotiations of the revised Deposit Guarantee Scheme Directive (DGSD), including the evolution of 10 mandates expected to be conferred on the EBA • Peer review to examine resilience of DGS • Q&A on DGSD *Consumer protection* • Q&A on MCD, PAD and CCD		
Outputs as per 2024 WP	*Consumer protection* • Assessment of the impact on the EBA of the revision of the EU Consumer Credit Directive	Q1	Q1*
	Payment services • Assess most recent payment fraud data – with findings published in the form of a report	Q2	Q3**
	Depositor protection • Publication on the uses of DGS funds, including in bank failures, and data on covered deposits and financial means available to DGSs		Q2
	Consumer protection • Final Guidelines on national registers under the Credit Servicers Directive		Q1
	• Final Guidelines on complaints handling under the Credit Servicers Directive		Q3***
	• Report on cost and performance of the EU structured deposits in 2024		Q3
	Consumer protection • Follow-up to the EBA Consumer Trends Report 2022/23 – findings published in the EBA Report on creditworthiness assessments of non-bank lenders	TBC	Q3
Postponed / on hold	*Payment services* • Follow-up on 2022 EBA Peer Review on the authorisation of PIs and EMIs under PSD2	Q2	****
Additional outputs	*Consumer protection* • Revision of GLs on arrears handling under MCD as a result of changes brought about to Art 28 MCD by CSD	-	Q2
	• JC SC CPFI workshop for NCA on 'Behavioural Finance' with publication of summary report		Q3

Activity 9: Payment services, consumer and depositor protection **Contributing to VP 5 – directorate ICC, unit Conduct, Payment and Consumers**		**Target**	**Actual**
	• Organisation of the Joint ESAs Consumer Protection Day (2024) with publication of highlights		Q4
	Payment services		
	• Opinion on new types of payment fraud		Q2
	• ITS on templates, instructions and methodology to report transfer and payment account charges under the new IPR		Q1 25*****

+ Tasks marked with a + were possible candidates to be postponed, cancelled or undertaken with less intensive resource input.

* No specific output was provided at that stage; the assessment will lead to an update of EBA GL to be prepared in due course.

** Slightly late delivery compared to original planning due to data quality issues.

*** Slightly late delivery compared to original planning to accommodate the legal constraint that the Directive has not been fully brought into the EBA's remit.

**** Planning updated to deliver follow-up in 2025.

***** Mandate received in Q2 2024 with zero-day deadline but delivered in 10 months.

Activity 10: Anti-money laundering and countering the financing of terrorism **Contributing to VP 5 – directorate ICC, unit AML/CFT**		**Target**	**Actual**
Ongoing activities	• *Identification and assessment of ML/TF risks, and dissemination of information about ML/TF risks based on, inter alia, information from EuReCA +* • *Monitoring of AML/CFT colleges and supporting their effective functioning +* • *Staff-led assessments of competent authorities' approaches to AML/CFT supervision with bilateral feedback and action points +* • Technical advice to support European and international AML/CFT objectives and the transition to AMLA • Supervisors Forum to support the transition to AMLA • Building supervisory capacity and promoting convergence of supervisory practices through bilateral support and training • *Support on Q&A on AML/CFT +*	-	-
Output as per 2024 WP	• Opinion on virtual IBANs	Q2	Q2
	• Guidelines on transfers of funds and crypto-assets		Q3*
	• Guidelines on policies, procedures and controls to support the implementation of restrictive measures	Q3	Q4*

Activity 10: Anti-money laundering and countering the financing of terrorism **Contributing to VP 5 – directorate ICC, unit AML/CFT**		**Target**	**Actual**
	• 4th (final) report on staff-led assessments of CA's approaches to AML/CFT supervision (implementation reviews)		Q4
	• 4th (final) report on the functioning of AML/CFT colleges	Q4	Q4
	• Peer review on dividend arbitrage trading schemes (cum-ex/cum-cum)		Q1 25*
Additional / other output	• RTS on the criteria for the appointment of AML/CFT Central Contact Points for CASPs – CP	-	Q4**

+ Tasks marked with a + were possible candidates to be postponed, cancelled or undertaken with less intensive resource input.

* Slightly delayed compared to original planning to accommodate EBA publication and governance schedules.

** Update of RTS necessary following extension of mandate in the FTR.

1.4.2 Risk assessment and data

Activity 11: Reporting and transparency **Contributing to VPs 3, 1, HP 1 – directorate Data Analysis Reporting and Technology, Reporting and Transparency Unit**		**Target**	**Actual**
Ongoing activities	• Regular update and maintenance of the supervisory and resolution reporting framework (legal act, templates, instructions and technical package) • Update and maintenance of the Pillar 3 framework • Follow-up of recommendations identified in the cost of compliance study, including the regular review of proportionality in reporting framework • Maintain validation rules, the data point model and XBRL taxonomies. • Continue with the development of the new tool – DPM Studio - to improve development and maintenance of data dictionary, including data-modelling, validations, transformations and data exchange formats creation • Implementation and maintenance of an integrated reporting system, following on from the EBA feasibility study on integrated reporting • Contribute to implementation of EU Supervisory Data Strategy across financial sectors • Maintain mapping tool between reporting and Pillar 3 • Opinions on sustainability reporting standards issued by EFRAG under CSRD	-	-

Activity 11: Reporting and transparency Contributing to VPs 3, 1, HP 1 – directorate Data Analysis Reporting and Technology, Reporting and Transparency Unit		Target	Actual
	• Development of the Pillar 3 data hub • Preparatory work on European single access point (ESAP), in coordination with ESMA and EIOPA • *Monitoring of Pillar 3 disclosures +* • Support Q&As on reporting and transparency framework • Continue our involvement in EU and international organisations, including EFRAG non-financial reporting body, BCBS DIS (Disclosure Expert Group) and BCBS Task Force on Climate-Related Financial Risks – workstream on disclosures		
Output as per 2024 WP	• Technical package v3.4 phase 2 • ITS to establish the templates for the Register of information in relation to all contractual arrangements on the use of ICT services provided by ICT third-party service providers	Q1	Q1
	• ITS on use of ARTs as a means of payment (MiCAR) • ITS on supervisory reporting – Implementation of CRR III changes (step 1) • ITS on Pillar 3 disclosures – Implementation of CRR III changes (step 1)	Q2	Q2 Q3* Q2
	• Technical package v4.0 supervisory reporting • ITS on the format and processes for reporting major ICT-related incidents (DORA)	Q3	Q4 Q3
	• ITS on disclosure requirements/ IT solutions (ITS part 1) – Pillar 3 data hub (P3DH) • Final report on the ITS on European single access point (ESAP)	Q4	Q1 25** Q4***
Delayed delivery	• Development of guidelines on resubmission policy as part of Roadmap for implementation of Cost of Compliance report recommendations • ITS to amend Resolution Planning reporting	2023 Q4	Q2 Q2 25** **
Postponed / on hold	• ITS on supervisory reporting – Implementation of CRR III / CRD VI changes (step 2) – CP • ITS on Pillar 3 disclosures – Implementation of CRR III / CRD VI changes (step 2) – CP • ITS on disclosure requirements/Resubmission policy (ITS part 2)	TBC TBC Q4	***** ***** ******
Additional output	• Technical package 3.5	-	Q3

+ Tasks marked with a + were possible candidates to be postponed, cancelled or undertaken with less intensive resource input.

* Slightly late delivery compared to original planning.

** CP was delivered in early Q3. Work late compared to planning due to broader scope and resources constraints.

*** Mandates not listed in the published Work programme 2024. Slightly late delivery compared to original planning albeit in accordance with legal deadlines.

**** Delivery now foreseen for Q2 2025.

***** Products will be revised in light of simplification discussions which affects delivery, although legal deadlines are not affected. Current planning aims for Q2 and Q3 of 2025 respectively.

****** Mandate not listed in the published Work programme 2024. Delivery under reconsideration in light of simplification discussions.

Activity 12: Risk analysis **Contributing to VP 2 – directorate ERA, unit RAST**		**Target**	**Actual**
Ongoing activities	• Quarterly EU risk dashboards • Risk assessment questionnaires – two per year • Internal updates on liquidity and market developments for the BoS and the BSG • Work on macroprudential matters (including buffers) • Opinions on macroprudential measures (Articles 124, 164 and 458 CRR) and systemic risk buffers (Article 133 CRD) • *Stock-take on the different macroprudential instruments applied across the EU +* • Thematic and topical notes on various risks • Contribution to ESRB work	-	-
Output as per 2024 WP	• JC spring risk report	Q1	Q2
	• Funding plans report • Asset encumbrance report • JC autumn risk report	Q2	* * Q3
	• Risk assessment report (RAR) of the European banking system (annual)	Q3	Q3 & Q4**
Additional output	• Risk Assessment Report – Spring 2024 topical notes on NBFIs and exposures towards Commercial Real Estate • Risk Assessment Report – Autumn 2024 topical note on Artificial Intelligence use in the EU banking sector	-	Q3 Q4

* From 2024 delivery of mandate as part of spring edition Risk assessment report (RAR).

** From 2024 Risk assessment report (RAR) is delivered in two editions.

Activity 13: Stress testing **Contributing to VP 2 – directorate ERA, unit RAST**		**Target**	**Actual**
Ongoing activities	• Ongoing work on the improvement of the stress test methodology • Work on the incorporation of climate risk into the stress test framework (regular environmental stress test) • Design and implementation of internal top-down stress test capacity	-	-
Output as per 2024 WP	• GL stress testing (MiCAR)	Q2	Q2
	• Preparation and methodological work for 2025 EU-wide stress test exercise (incl. hybrid approach) • One-off fit-for-55 climate scenario analysis	Q4	Q4
Postponed / on hold	• GL on ESG scenario analysis – CP	Q4	*
	• Joint ESAs Guidelines on methodologies for climate stress testing – CP	TBC	**

* Delivery updated in accordance with legal deadline. CP was published in Q1 2025.

** Delivery is now foreseen for Q3 2025.

Activity 14: Regulatory impact assessment **Contributing to all priorities – directorate ERA, unit EAIA**		**Target**	**Actual**
Ongoing activities	• Impact assessment reports that accompany EBA's regulatory proposals and policy recommendations • Analysis and research to support and enhance ongoing regular EBA economic and statistical methodology and analysis • Develop economic and statistical tools and models for new functions (such as ESG and digital finance) • Maintenance and development of regular and ad hoc quantitative impact studies and the regular mandatory data collections for these, contacts to BCBS QIS TF and research TF • Publication of EBA staff papers • Contribution to work on ESG factors, financial innovation, payments, digital finance and AML/CFT • Contribution to the top-down stress test framework • Contribution to the Task Force of Impact Studies and Advisory Committee on Proportionality • Specific calls for advice, thematic notes on risk analysis and other larger regulatory initiatives	-	-

Activity 14: Regulatory impact assessment **Contributing to all priorities – directorate ERA, unit EAIA**		**Target**	**Actual**
	• Organisation of and participation in academic seminars and research workshops or initiatives which benefit the quality of work in EBA products		
Output as per 2024 WP	• CRR II / CRD V and CRR III / CRD VI / Basel III monitoring report (annual report)	Q3	Q4*
	• Annual report on the impact and phase in of the LCR • Annual report on the impact and phase in of the NSFR • Policy research workshop	Q4	Q4 Q4** Q4
Postponed / on hold	• *Call for Advice (to be received) on insolvency benchmarking – as envisaged under the CMU action plan +*	Q2	***
Additional Output	• Call for advice (CfA) on non-EU entities and EU banks funding dependencies	-	Q4

* Slightly late delivery (in early Q4) compared to original planning.

** NSFR report delivered together with LCR report.

*** Call for advice yet to be received. Planned delivery updated to be updated.

Activity 15: Data infrastructure and services, statistical tools **Contributing to VP 3 – directorate DART, unit STAT**		**Target**	**Actual**
Ongoing activities	• Support regulatory work with quantitative analysis and analytical tools • *Provide data-based support for work on regulatory products (impact assessments) and technical advice requested by the Commission +* • *Provide data-based support for the statistical activities related to top-down stress test and climate risk stress test + ** • *Provide data-based support for the statistical activities related to Supervisory benchmarking +* • Support and maintain the EBA's data infrastructure: master data and fact data for supervisory, resolution, IFs and payments purposes; setting reporting requirements; monitoring submissions • Manage the data workflow and interact with the CAs to ensure smooth data flow and quality • *Train CA and EBA users on data and analysis tools +* • Implement validation rules and quality checks for statistical analysis	-	-

Activity 15: Data infrastructure and services, statistical tools **Contributing to VP 3 – directorate DART, unit STAT**		**Target**	**Actual**
	• Improve transparency in the banking sector through the re-use of supervisory information and the pre-population of templates • Develop interactive and user-friendly visualisation tools for data dissemination • Implementation of multi-year data strategy, building on EUCLID to improve data processing and analytical capabilities and to provide access, via a dissemination portal, to high-quality data and insights to stakeholders • EUCLID upgrade for the collection and dissemination of Pillar 3 information • EUCLID upgrade for supporting DORA and MiCAR mandates Additional activities • Upgrade to SAS Viya and migration to the Cloud** • *Provide data-based support for work on fraud reporting +*		
Output as per 2024 WP	• Risk dashboard (RDB) and other related tools for internal and external data users – including new MREL dashboard*** • Bank-specific dashboards for internal users and CAs	Quarterly	Quarterly
	• 2024 EU-wide Transparency exercise • Supervisory disclosure exercise	Q4	Q4
Additional Output / activities	• List of third-country groups with intermediate EU parent undertakings and third-country branches operating across the EU/EEA • Support to the industry in preparation of the first reporting of DORA Registers of information, with a dry-run exercise	-	Q4 ****

+ Tasks marked with a + were possible candidates to be postponed, cancelled or undertaken with less intensive resource input.

* The findings of the fit-for-55 exercise were published in Q4.

** This activity will give rise to an output in 2025.

*** ESG Dashboard first published in Q1 2025.

**** A summary report of the ESAs dry-run exercise was published in Q4.

1.4.3 Coordination and support

Activity 16: EBA governance, international affairs, communication **Unit Governance and External Affairs**		**Target**	**Actual**
Ongoing activities	• Support the EBA’s governing bodies, as well as the Banking Stakeholder Group, the Advisory Committee on proportionality, the Board of Appeal and the ESAs Joint Committee work	-	-

Activity 16: EBA governance, international affairs, communication Unit Governance and External Affairs		Target	Actual
	• Support the EBA's contribution to EU and international fora • Develop internal policies/processes to support the EBA's activities • Implement the EBA's communication strategy and ensure external and internal communication • Development and execution of the Union Strategic Supervisory Priorities 2024–2026 • Prepare and monitor the execution of the annual and multi-annual work programme • Develop and maintain relations with EU and non-EU stakeholders • Hold dialogues and exchanges with relevant authorities in EU and non-EU jurisdictions • Training for EU competent authorities • Prepare reports and opinions on regulatory and confidentiality equivalence assessment and/or monitoring		
Output as per 2024 WP	• Single programming document (2025–2027 horizon)	Q1	Q1
	• Consolidated annual activity report 2023 • Annual report 2023	Q2	Q2*
	• 2025 Annual work programme • JC 2025 Annual work programme	Q3	Q3
Additional output	• JC Annual report	-	Q2

* Delivery in one document published in two stages.

Activity 17: Legal and compliance Unit Legal and Compliance		Target	Actual
Ongoing activities	• Legal advice to EBA staff and governing bodies • Sound internal processes for adopting EBA decisions • Represent the EBA before the Board of Appeal and the Court of Justice and in interactions with the European Ombudsman • Development and implementation of data protection, ethics and whistleblowing, risk management and anti-fraud frameworks • Handle access to documents requests • Identify potential breaches of EU law, investigate and act as appropriate	-	-

Activity 17: Legal and compliance **Unit Legal and Compliance**		**Target**	**Actual**
	• Settle CA disputes through mediation and binding decisions • Monitor and foster supervisory independence of CAs • Conduct peer reviews of the activities of competent authorities as well as related follow-up as set out in the peer review plan – included in annex III • Q&A: coordinate the internal preparation by the policy areas of the answers to external stakeholders on the Single Rulebook		
Output as per 2024 WP	• *Peer review on definition of default +*	Q2	Q3*
	• Peer review on dividend arbitrage trading schemes (cum-ex/cum-cum)	Q4	Q4*
Delayed delivery	• Follow-up on peer review on NPEs	Q2	Q4**
	• Peer review on proportionality in the application of the SREP	Q3	Q1 25**
Postponed / on hold	• Draft GL on the prevention of conflicts of interests in and independence of competent authorities	Q4	***
	• Follow-up on peer review on ICT risk	Q3	****

* Slightly late delivery of peer review report.

** Late delivery of peer review reports due to issues with data and responses.

***Planning updated to deliver in accordance with legal deadline.

**** Delivery updated to after publication of the CP of the SREP GLs (foreseen for Q3 2025) as this review was part of the follow up actions of the peer review.

Activity 18: Resources (HR and finance) **Unit HR and FP**		**Target**	**Actual**
Ongoing activities	*Human resources* • Maximised execution of the Establishment Plan (at least 95%) • Ensured compliance to the SR/CEOS with Implementing Rules' adoption (Article 110 of the SR) • Optimised talent identification, attraction and acquisition approach • Revamped talent career development framework • Increased HR digitalisation (deployment of the e-recruitment tool and kick-off the SYSPER onboarding) *Finance* • Execution of the 2024 annual budget • Establishment and acquisition of the 2025 budget	-	-

Activity 18: Resources (HR and finance) Unit HR and FP		Target	Actual
	• Establishment of the 2026 budget • Implementation of the 2024 procurement plan • Production of the 2023 annual accounts • Development of system(s) for budgeting and costing fees (MiCAR/DORA) • Preparation for implementation of the Commission's SUMMA system (successor to the current ABAC accounting and budget system) • Support the annual ECA audit • Ongoing improvement projects (Finance & Procurement), including work on the transition to SUMMA (Commission's new budget and accounting system)		

Activity 19: Infrastructures (Information technology and corporate support) Units: IT and CSU		Target	Actual
Ongoing activities	*IT* • Implement the EBA's IT strategy for 2020–2025 • Migrate the existing infrastructure to cloud, transform current IT Estate and join the Cloud II Framework of the EC • Master and reporting data collection via the EUCLID platform (including committed information rate, peak information rate, supervisory, resolution, investment firms (IFs), Covid-19 reporting, Pillar III disclosures) • Enhance EUCLID solution with data validation and dissemination capabilities. Implementation of a data dissemination solution in light of preparing for the Pillar II data hub. • Implement tools for the support of the EBA reporting framework • Support and enhancement of AML solution (EuReCA platform). • Support and enhance collaboration tools within EBA and external stakeholders • Replace legacy systems with cloud native solutions • Support and tools for the Single Rulebook/signposting/ Q&A • Access management and security enhancements • Implementation of solutions for the EBA's operational readiness to take up new tasks in relation to MiCAR and DORA • Support the organisation of internal and external meetings *Corporate support* • Support the provision of catering and canteen services	-	-

Activity 19: Infrastructures (Information technology and corporate support) Units: IT and CSU		Target	Actual
	• Support the organisation of internal and external meetings (including reimbursements) • Support the organisation and reimbursement of missions • Manage the EBA premises, reception, postal services and office supplies • Projects related to premises (fit-out; design; furniture) • Adhere to security, health and safety requirements and supplies • Ensure that the use/disposal of EBA assets and inventory is compliant, safe, economic and environmentally friendly • Maintain EMAS registration and continue to improve the EBA's environmental performance and reduce its carbon footprint • Coordinate the implementation of Sustainability Reporting standards • Contribute to the improvement and monitoring of an internal control system • Audits: European Court of Auditors (ECA) and EC Internal Audit Services (IAS) • Contribute to the EBA-wide annual risk assessment exercise and undertake corporate support related specific risk		
Output as per the 2024 WP	*Corporate support* • Manage the business continuity programme and coordinate the annual business continuity exercise	Q1	Q1

1.5 Key priorities for 2025

Following on from the multi-annual priorities the EBA has set its preliminary strategic priorities for 2025 as follows:

P1 2025
Implementing the EU banking package and enhancing the Single Rulebook

P2 2025
Enhancing risk – based and forward-looking financial stability for a sustainable economy

P3 2025
Enhancing data infrastructure and launching the data portal

P4 2025
Starting oversight and supervisory activities for DORA and MiCAR

P5 2025
Developing consumer oriented mandates and ensuring a smooth transition to the new AML/CFT framework

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