European Banking Authority

ANNUAL REPORT

YEAR 2024

EBA/REP/2025/17 JUNE 2025

Contents

List of figures

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, 30 June 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

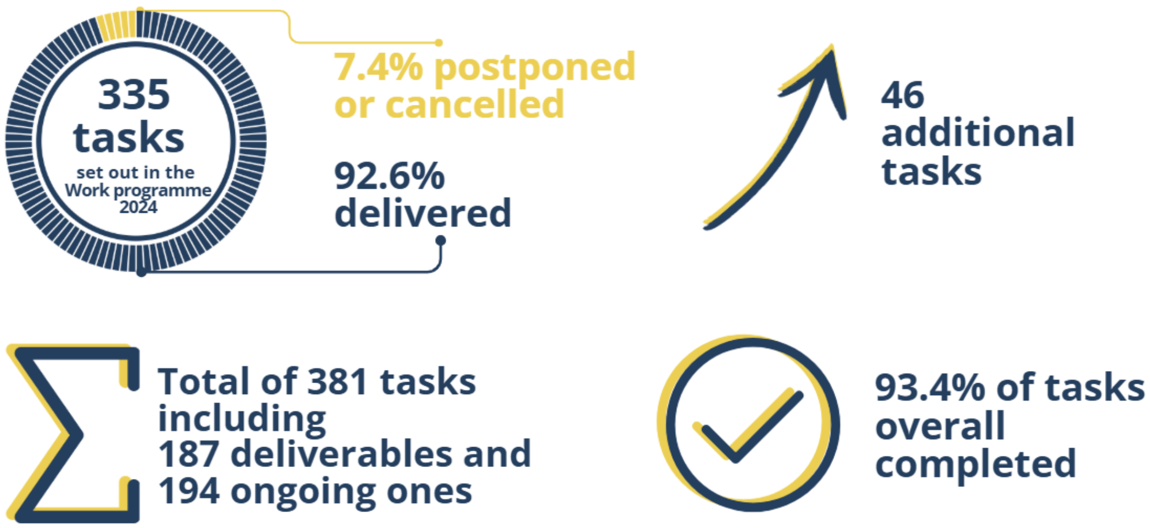
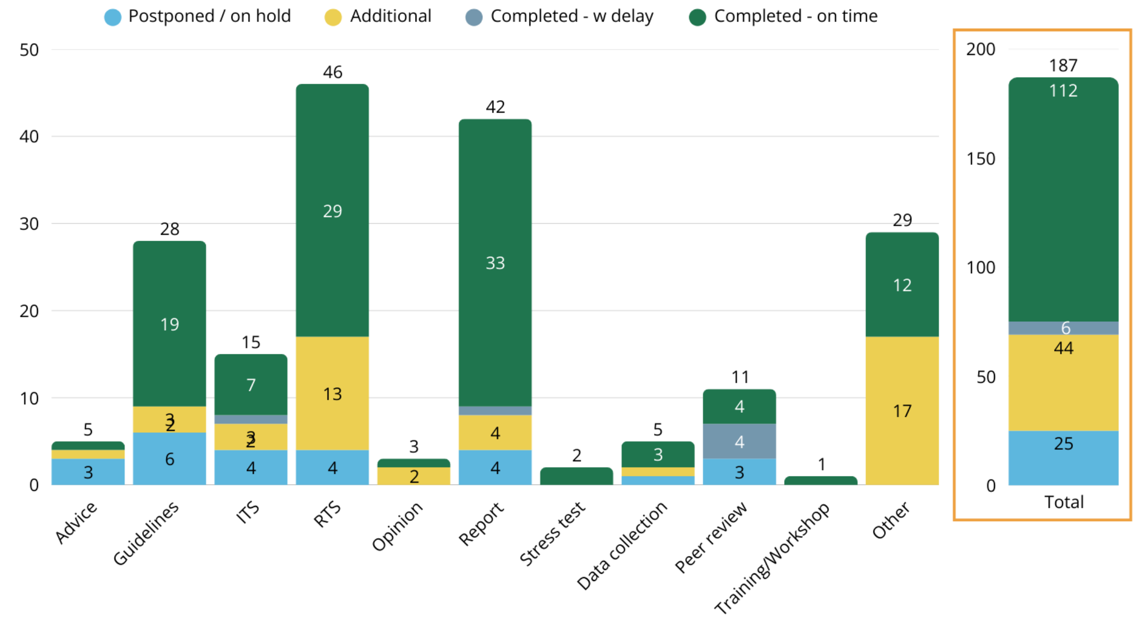


Figure 2: Breakdown of deliverables by category



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 Securitisation Regulation (SECR). 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.

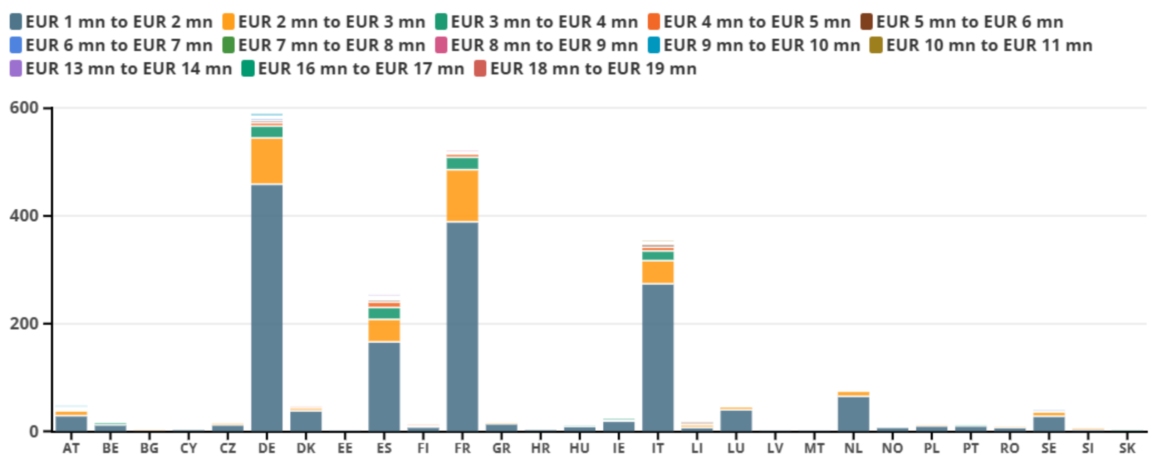
On the topic of remuneration, in July the authority published its report on the application of gender-neutral remuneration policies by institutions subject to the CRD and the IFD, based on information collected from institutions, investment firms and CAs. The report shows that the industry faces no major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

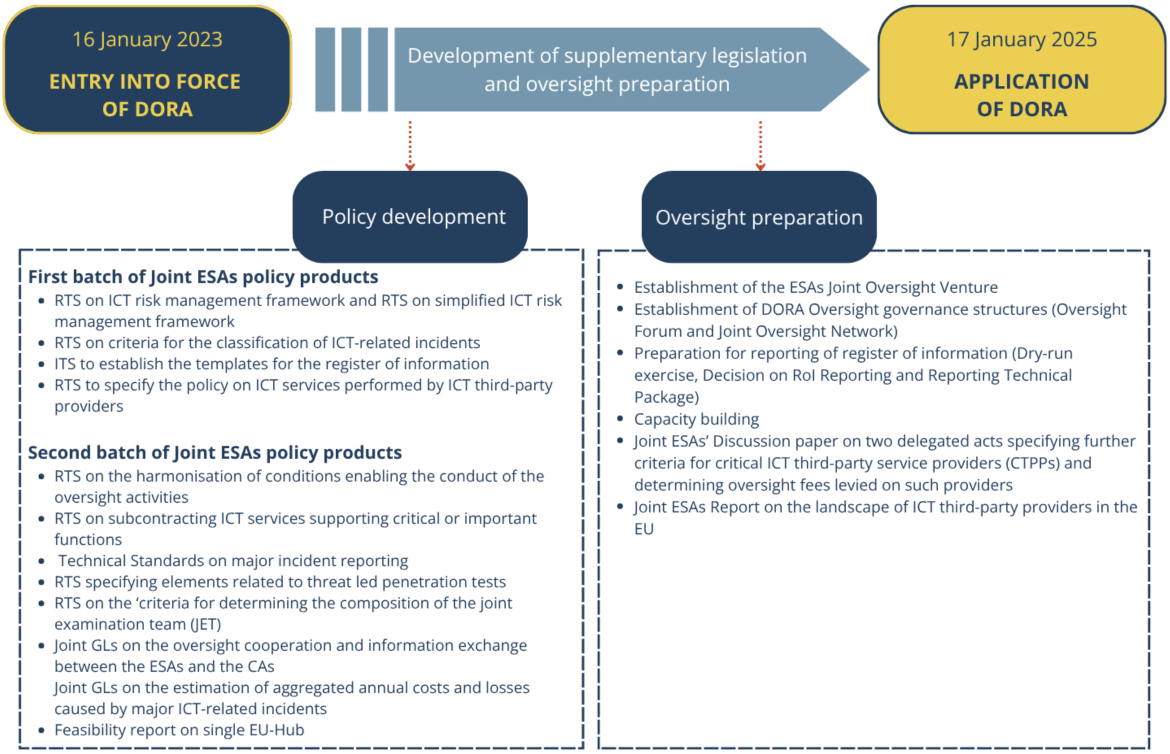
DORA and MiCA are part of the EU Digital Finance Strategy, which aims to ensure that the current legal framework does not pose inadvertent obstacles to the use of new technologies and the emergence of new products while ensuring effective risk mitigation.

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].

[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.

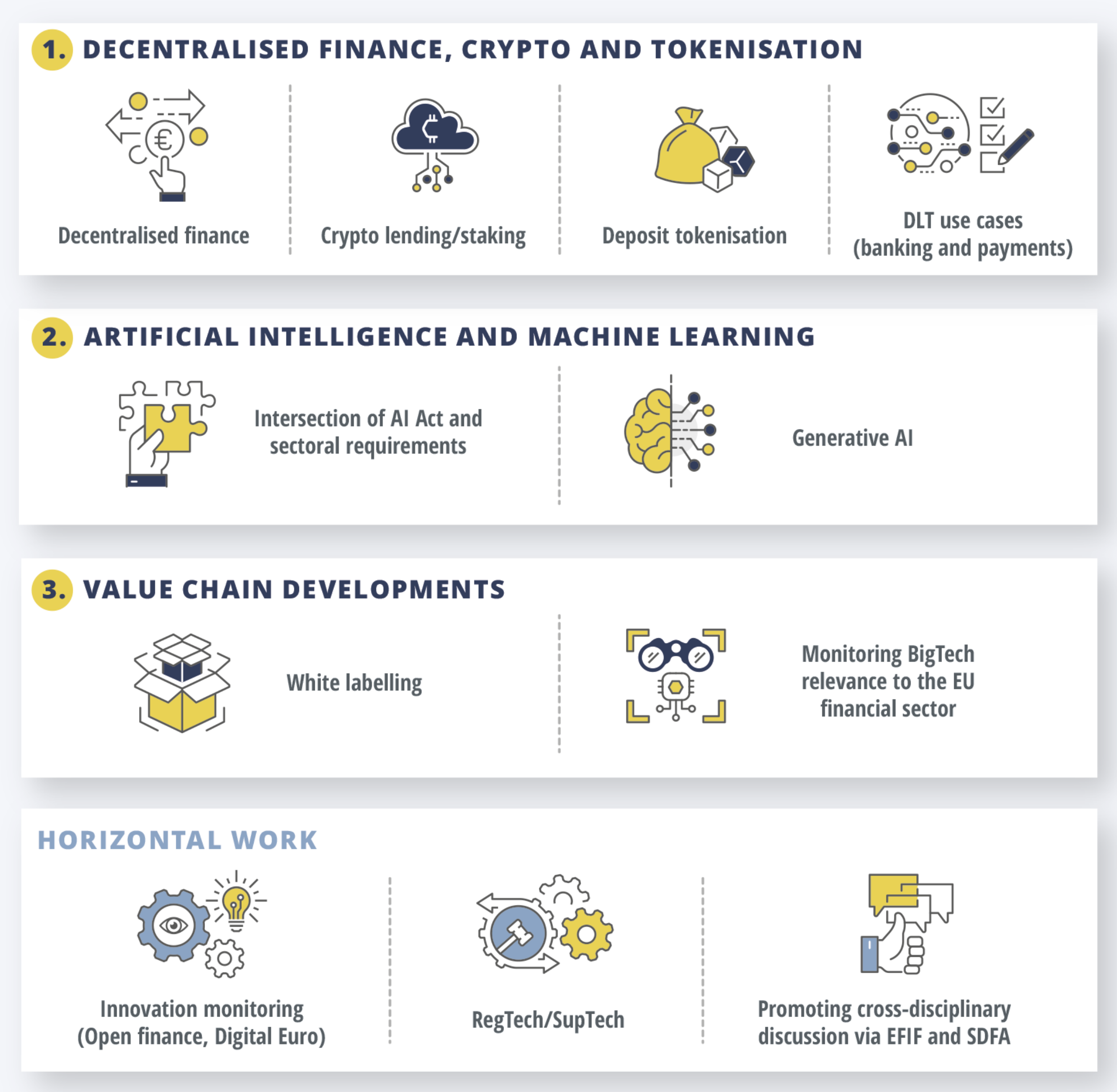
1.1.5 Increasing focus on innovation and consumers (including access to financial services) while preparing for the transition to the new AML/CFT framework

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	Achievement
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	Up to three initiatives 100% reviewed materia	i) and ii) four initiatives (including workshops) iii) Fully achieved

	Indicator	Weight	Short description	Target	Achieveme nt
			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	ls for SDFA	
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 • Guidelines to specify proportionate diversification methods for retail definition – CP • 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 • ITS on joint decision process for internal model authorisations under Art 20(8) CRR – CP • 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	-	Q3 Q2** Q4** Q3** 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 Commission 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 CAs via the EBA FinTech Knowledge Hub (workshops, roundtables, seminars) and the European Forum for Innovation Facilitators (EFIF) • Activities based on work programme 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 – MiCA Contributing to VP 4 – lead directorate ICC, lead unit DF		Target	Actual
Ongoing activities	• Monitor crypto asset markets and developments and assisting Commission for any follow-up work related to MiCA review • Set-up of supervisory function under MiCA and preparation of supporting documentation and processes. • Set-up of other tasks under MiCA, such as classification of crypto assets and product intervention powers	-	-

Activity 8 continued – MiCA 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 MiCA (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 MiCA and reminder for consumers of risks		Q3
	• Priorities for ART/EMT issuers supervision – 2024/2025		Q3

Activity 8 continued – MiCA **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 MiCA		Q4

* Mandate not listed in published Work programme 2024.

Activity 8A: DORA oversight / MiCA supervision **Contributing to Priority 4**			
Ongoing activities	• Carrying out DORA oversight activities in accordance with the oversight plan • Carrying out MiCA 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 *MiCA 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 MiCA • 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		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	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 CAs' 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	-	-

<table>
<tr><th colspan="2">Activity 11: Reporting and transparency
Contributing to VPs 3, 1, HP 1 – directorate Data Analysis Reporting and Technology, Reporting and Transparency Unit</th><th>Target</th><th>Actual</th></tr>
<tr><td></td><td>• 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</td><td></td><td></td></tr>
<tr><td rowspan="8">Output as per 2024 WP</td><td>• 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</td><td>Q1</td><td>Q1</td></tr>
<tr><td>• ITS on use of ARTs as a means of payment (MiCA)</td><td rowspan="3">Q2</td><td>Q2</td></tr>
<tr><td>• ITS on supervisory reporting – Implementation of CRR III changes (step 1)</td><td>Q3*</td></tr>
<tr><td>• ITS on Pillar 3 disclosures – Implementation of CRR III changes (step 1)</td><td>Q2</td></tr>
<tr><td>• Technical package v4.0 supervisory reporting</td><td rowspan="2">Q3</td><td>Q4</td></tr>
<tr><td>• ITS on the format and processes for reporting major ICT-related incidents (DORA)</td><td>Q3</td></tr>
<tr><td>• ITS on disclosure requirements/ IT solutions (ITS part 1) – Pillar 3 data hub (P3DH)</td><td rowspan="2">Q4</td><td>Q1 25**</td></tr>
<tr><td>• Final report on the ITS on European single access point (ESAP)</td><td>Q4***</td></tr>
<tr><td rowspan="2">Delayed delivery</td><td>• Development of guidelines on resubmission policy as part of Roadmap for implementation of Cost of Compliance report recommendations</td><td>2023</td><td>Q2</td></tr>
<tr><td>• ITS to amend Resolution Planning reporting</td><td>Q4</td><td>Q2 25****</td></tr>
<tr><td rowspan="3">Postponed / on hold</td><td>• ITS on supervisory reporting – Implementation of CRR III / CRD VI changes (step 2) – CP</td><td>TBC</td><td>*****</td></tr>
<tr><td>• ITS on Pillar 3 disclosures – Implementation of CRR III / CRD VI changes (step 2) – CP</td><td>TBC</td><td>*****</td></tr>
<tr><td>• ITS on disclosure requirements/Resubmission policy (ITS part 2)</td><td>Q4</td><td>******</td></tr>
<tr><td>Additional output</td><td>• Technical package 3.5</td><td>-</td><td>Q3</td></tr>
</table>

+ 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 (MiCA)	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 MiCA 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 CAs • 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 interest in and independence of CAs	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 (MiCA/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 Commission • 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 MiCA 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 Commission 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

Part II – Management

2.1 Management Board and Board of Supervisors

2.1.1 Board of Supervisors

The Board of Supervisors is the EBA's main decision-making body and guides the work of the Authority. In addition to the EBA's Chairperson, the Board of Supervisors is composed of the heads of banking supervision or their representatives in 30 national EU and EEAEFTA supervisory authorities, who are sometimes accompanied by a representative from the national central bank. It also includes representatives from the European Commission, the European Systemic Risk Board, the European Central Bank, the Single Supervisory Mechanism, the Single Resolution Board, the European Securities and Markets Authority, the European Insurance and Occupational Pensions Authority, and the EFTA Surveillance Authority.

As of 10 July 2023, the Board of Supervisors appointed Mr Helmut Ettl, Executive Director of the Austrian Financial Market Authority, as Vice-Chairperson for a 2.5-year term.

In 2024, the Board of Supervisors met nine times and twice with the EBA's Banking Stakeholder Group. All the minutes of the Board of Supervisors, Management Board and Banking Stakeholder Group are available on the EBA website under the section Governance structure and decision making | European Banking Authority.

Board of Supervisors' composition at the end of 2024

Voting members

Country	Institution	Type of membership	Name
n/a	European Banking Authority	Chairperson	José Manuel Campa
Austria	Österreichische Finanzmarktaufsicht	Member	Helmut Ettl
		Alternate	Michael Hysek
Belgium	Nationale Bank van België/Banque Nationale de Belgique	Member	Jo Swyngedouw
		Alternate	Kurt Van Raemdonck
Bulgaria	Bulgarian National Bank	Member	Radoslav Milenkov
		Alternate	Stoyan Manolov
Croatia	Hrvatska Narodna Banka	Member	Tomislav Ćorić
		Alternate	Sanja Petrinić Turković
Cyprus	Central Bank of Cyprus	Member	Constantinos Trikoupis
		Alternate	Kleanthis Ioannides
Czechia	Česká Národní Banka	Member	Zuzana Silberová
		Alternate	Marcela Gronychová
Denmark	Finanstilsynet	Member	Louise Caroline Mogensen

Country	Institution	Type of membership	Name
		Alternate	Thomas Worm Andersen
Estonia	Finantsinspektsioon	Member	Andres Kurgpold
		Alternate	Kilvar Kessler
Finland	Finanssivalvonta	Member	Marko Myller
		Alternate	Jyri Helenius
France	Autorité de Contrôle Prudentiel et de Résolution	Member	Nathalie Aufauvre
		Alternate	François Haas
Germany	Bundesanstalt für Finanzdienstleistungsaufsicht	Member	Raimund Roeseler
		Alternate	Adam Ketessidis
Greece	Bank of Greece	Member	Heather Gibson
		Alternate	Maria Katsaki
Hungary	Magyar Nemzeti Bank	Member	Csaba Kandrács
		Alternate	László Vastag
Ireland	Central Bank of Ireland	Member	Gerry Cross
		Alternate	Mary-Elizabeth McMunn
Italy	Banca d'Italia	Member	Andrea Pilati
		Alternate	Francesco Cannata
Latvia	Latvijas Banka	Member	Kristīne Černaja-Mežmale
		Alternate	Ludmila Vojevoda
Lithuania	Lietuvos Bankas	Member	Simonas Krėpšta
		Alternate	Renata Bagdonienė
Luxembourg	Commission de Surveillance du Secteur Financier	Member	Claude Wampach
		Alternate	Nele Mayer
Malta	Malta Financial Services Authority	Member	Christopher P. Buttigieg
		Alternate	Anabel Armeni Cauchi
Poland	Komisja Nadzoru Finansowego	Member	Artur Ratasiewicz
		Alternate	
Portugal	Banco de Portugal	Member	Rui Pinto
		Alternate	Jose Rosas
Romania	Banca Naţională a României	Member	Adrian Cosmescu
		Alternate	Cătălin Davidescu
Slovakia	Národná Banka Slovenska	Member	Tatiana Dubinová
		Alternate	Linda Šimkovičová
Slovenija	Banka Slovenije	Member	Primož Dolenc
		Alternate	Damjana iglič
Spain	Banco de España	Member	Ángel Estrada
		Alternate	Agustín Pérez Gasco
Sweden	Finansinspektionen	Member	Henrik Braconier

Country	Institution	Type of membership	Name
		Alternate	Magnus Eriksson
Netherlands	De Nederlandsche Bank	Member	Steven Maijoor
		Alternate	Willemieke van Gorkum

EEA and EFTA members

Country	Institution	Type of membership	Name
Iceland	Fjármálaeftirlitið	Member	Björk Sigurgísladóttir
		Alternate	Gísli Óttarsson
Liechtenstein	Finanzmarktaufsicht Liechtenstein (FMA)	Member	Markus Meier
		Alternate	Elena Seiser
Norway	Finanstilsynet	Member	Per Mathis Kongsrud
		Alternate	Anders Sanderlien Hole
–	EFTA Surveillance Authority	Member	Frank Büchel
		Alternate	Jonina Sigrun Larusdottir

Observers

Institution	Name
SRB	Karen Braun - Munzinger

Other non-voting members

Institution	Name
ECB	Katrin Assenmacher
ECB Supervisory Board	Thijs van Woerden
EIOPA	Fausto Parente
ESMA	Natasha Cazenave
ESRB	Francesco Mazzaferro
European Commission	Ugo Bassi

2.1.2 Management Board

In accordance with the EBA's Founding Regulation, the Management Board ensures that the EBA carries out its mission and performs the tasks assigned to it. It is composed of the EBA Chairperson and six other members of the Board of Supervisors elected by and from its voting members. The Executive Director, the EBA Vice-Chairperson and a representative from the Commission also participate in its meetings.

The Management Board met five times in 2023, of which two meetings were held at the EBA's premises, and the remaining meetings were held as videoconferences. The Management Board steers the preparation and revisions of the EBA's Annual Work Programme and the development of the Draft Single Programming Document, which were approved in 2024 before their submission for final approval by the Board of Supervisors. The Management Board monitors the execution of the EBA's tasks and activities, the budget planning process and the allocation of human and financial resources. To guarantee the transparency of its decision-making, minutes of the Management Board's meetings are published on the EBA website.

Management Board composition at the end of 2024

Country	Institution	Type of membership	Name
Germany	Bundesanstalt für Finanzdienstleistungsaufsicht	Member	Raimund Roeseler
		Alternate	Adam Ketessidis
Greece	Bank of Greece	Member	Heather Gibson
		Alternate	Ekatrini Korbi
Hungary	Magyar Nemzeti Bank	Member	Csaba Kandrács
		Alternate	László Vastag
Latvia	Latvijas Banka	Member	Kristīne Černaja-Mežmale
		Alternate	
Spain	Banco de España	Member	Ángel Estrada
		Alternate	Agustín Pérez Gasco
	European Banking Authority		José Manuel Campa

2.2 Major developments

2.2.1 Establishing the ESAs DORA Joint Oversight Venture

The EBA, together with the ESMA and EIOPA, are embarking on their new responsibility of overseeing critical third-party providers (CTPPs) providing information, communication and technology (ICT) services to EU financial entities. To ensure efficiency, synergies and consistency in carrying out the oversight activities, the ESAs have set-up a Joint Oversight Venture (JOV) organised as a common ESA department.

The JOV pools the ESAs' staff resources, together with contributions from CAs, into a single team. This will ensure maximum consistency in the approach towards CTPPs, optimise the use of limited resources by avoiding redundancies, ensure easier allocation of resources among the ESAs over time and a sector-neutral approach, as well as facilitating internal coordination and the development of a common oversight culture in largely uncharted territory.

The JOV is headed by a 'DORA Joint Oversight Director' who reports directly to the three ESA Executive Directors. The department functionally consists of three units, one within each ESA, responsible for different domains of ICT services and groups of Joint Examination Teams (JETs). The JETs are the teams of ESA and CA examiners allocated for each CTPP and they will assess their risks and carry out examination activities.

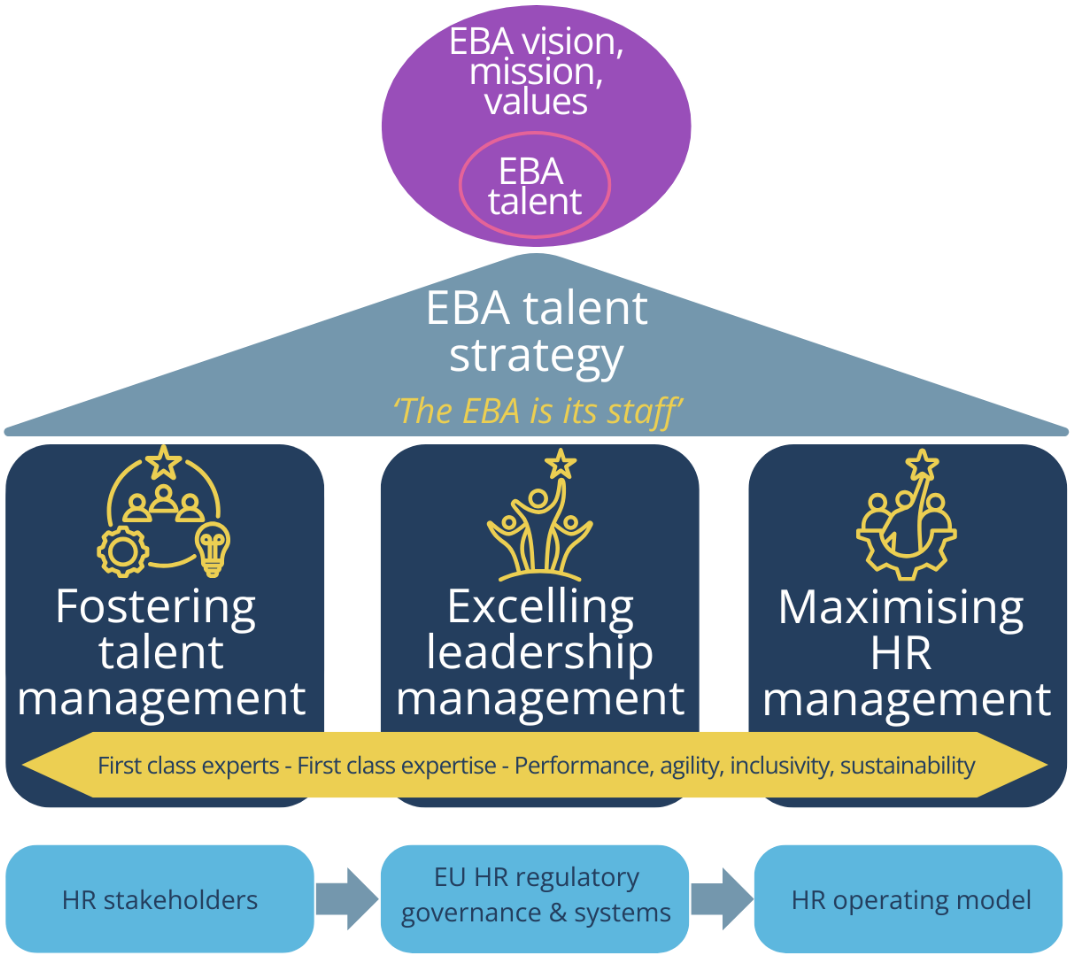
The novel approach with the JOV is a first between EU agencies.

2.2.2 Launching the Horizon 2024–2029 talent strategy

The world of work, which has fundamentally changed since the 2020 pandemic, has led to a volatile, uncertain, complex and ambiguous environment, putting pressure on the shape of talent management. The global talent shortage in some areas, the digital transformation with AI, the rise of diversity, equity and inclusion (DEI), the importance of mental health and wellbeing, and the green deal, all require new thinking to reimagine Human Resources Management.

The Horizon 2024–2029 talent strategy is a pragmatic response to the EBA's DNA of having first-class experts delivering first-class expertise. Leveraging talent's versatility, mobility, career development, and striving for a trust-based, inclusive and values-driven environment are at the heart of this strategy.

The Horizon 2024–2029 talent strategy vision is upheld by an interplay of three strategic pillars and nine cross-cutting objectives, with 90 concrete outputs that drive the implementation roadmap. Through these pillars, the Authority is working to integrate talent management into many facets of its operational activities, moving the EBA towards a future where its talent succeeds together and keeps growing.



2.2.3 Implementing the IT strategy

In alignment with its 2020–2025 'Digital Agency' IT Strategy, the EBA has maintained its dedication to digitalising its infrastructure, business products and services, workplace environments and services, with a fundamental focus on security and privacy. Through business-driven investments, the EBA consolidated its IT infrastructure post-cloudification in 2024, enhanced the team, optimised costs, and continued to deliver on crucial mandates and business initiatives. Furthermore, it introduced new technologies and supported EBA and NCA staff in exploring AI and supervisory technology (SupTech). The EBA also collaborated closely with ESA peers to fortify IT security and prepare for the Cyber Regulation.

In 2024, the EBA successfully adhered to its IT workplan and maintained budgetary discipline. Significant initiatives included the implementation of the Pillar 3 Hub, where a pilot with 13 banks was concluded in 2024, preparation for the Digital Operational Resilience Act (DORA), CTPP designation and oversight, and the kick-off of the implementation of a shared platform for the Markets in Crypto-Assets Regulation (MiCA) collection. Furthermore, the EBA finalised its dissemination portal to enhance service delivery and information dissemination to stakeholders and the public.

The EBA completed the first phase of the migration to the Digital Regulatory Reporting (DRR) tool, DPM Studio, which will support a continuous reporting framework development process, including DPM releases, a full validation rules lifecycle, support for data calculations and creation of eXtensible Business Reporting Language (XBRL) taxonomy packages.

Significant advancements have been achieved in workplace and collaboration solutions. Noteworthy developments include the launch of a redesigned EBA website in early 2024, implementation of a second-generation EBA extranet featuring an improved collaboration platform toolset, and continued advancement in the implementation of the internal EBA records management system.

Furthermore, additional initiatives to advance the digitalisation of its suite of applications and services have been initiated and are currently underway. These include the introduction of a new Enterprise Identity and Access Management system, new business digital products and services, and new corporate solutions (SYSPER2, MIPS, ServiceNow, SUMMA) for which it also counts on the support of the Commission when they are providing/enabling these services.

2.2.4 Living the EBA values

The *Living the EBA Values* campaign is an opportunity to reflect on and reinforce the core principles that guide the EBA's work and relationships: **Public Service, Excellence, Trust, Creativity, and Collaboration.** The campaign's main objectives were to raise awareness of these values and further embed them into the EBA's daily operations.

Developed with input from all staff last year, this initiative builds on an already strong foundation, helping the EBA amplify its impact – for the organisation, its partners, and the EU citizens who benefit from its work.

In August 2024, staff participated in a benchmarking survey to assess their familiarity with the EBA values and how well these principles were integrated into daily activities. The results were reviewed by senior management and a dedicated task force to help shape the campaign's direction.

Running until March 2025, the six-month campaign featured a monthly spotlight on each value, with an EBA Director introducing it through the weekly staff newsletter and intranet. A **multi-channel communication strategy** was also implemented, including:

- short video testimonials from staff;
- new intranet features;
- regular staff newsletter updates, highlighting teams and individuals who exemplify the values; and
- a range of **visual aids**, such as roll-up banners for each value, posters across all floors, and a new careers brochure showcasing the EBA's values.

To measure the campaign's impact, **Senior Management will launch a final benchmarking survey in Q2 2025** with the support of the EBA's task force.

2.2.5 Gender, diversity and inclusion (D&I)

The EBA actively pursued its commitment to fostering an open and inclusive workplace culture by ensuring equal treatment and opportunities to everyone, irrespective of who they are, where they come from and what they believe in.

In line with the EU gender equality strategy adopted in 2020, the EBA has achieved, within only a few years, a gender-equal working environment (50 %) with also increased representation of women in leadership positions (e.g.: 60 % female directors).

The EBA continued to engage in proactive cross-cutting actions aimed at strengthening good practices around D&I, by:

- Including a gender mainstreaming perspective in all areas, adopting intersectionality as guiding principle.
- Fostering D&I as a corporate culture throughout the employee lifecycle (e.g.: D&I-enhanced job vacancies, specific mention of D&I in newcomers' induction sessions, mitigating bias training, D&I toolkit for managers, etc.).
- Communicating and raising awareness by bringing the topic to the forefront with: the third ESAs' high-level conference on financial services and gender held on 15 November 2024 with Nadia Calviño, President of the European Investment Bank as keynote speaker; the EBA D&I talks/podcasts providing valuable insights, expert perspectives and inspiring discussions to promote D&I within the organisation.
- Promoting awareness and developing supportive measures for persons with disabilities (e.g.: accessibility of EBA premises, inclusive meetings and missions, materials accessible for assistive technology, dietary requirements, socially responsible procurement, specific accommodations in recruitment procedures, etc.).
- Conducting data collection, benchmarking and developing a dashboard supporting track progress in D&I efforts, ensuring transparency, accountability and continuous improvement.

2.3 Budgetary and financial management

2.3.1 Budget overview

The EBA achieved an execution level of 99.9% – its highest ever – on its final budget for 2024.

Title	Voted budget *A*	Committed *B*	% *C=B/A*	Paid *D*	% *E=D/A*	Carry forward *F*	% *G=F/B*
I: Staff expenditure	36 542 785	36 539 088	100.0 %	36 184 857	99.0 %	354 231	1.0 %
II: Administrative spend	12 278 809	12 267 264	99.9 %	10 898 347	88.8 %	1 368 917	11.2 %
III: Operational spend	8 084 607	8 038 909	99.4 %	5 848 171	72.3 %	2 190 738	27.3 %
TOTAL	**56 906 201**	**56 845 261**	**99.9 %**	**52 931 375**	**93.0 %**	**3 913 886**	**6.9 %**

The level of commitment appropriations carried forward from 2024 to 2025 was within the ECA's recommended thresholds for each title (being 10%, 20% and 30% for titles I, II and III, respectively) and for the total budget appropriations (threshold of 15% of the final adopted budget).

2024 budget amendments and transfers

The initial budget adopted by the EBA Board of Supervisors (BoS) on 21 December 2023 for a total amount of EUR 56 633 074 was amended twice over the course of the year:

- In July, it was increased by EUR 286 354 to reflect:
  - An ad hoc EU subsidy, matched by NCA contributions, to cover staff costs for DORA preparations.
  - Estimated increased pension costs arising from salary indexation above budget and from an increase in the pensions contribution rate to 12.1%.
- In December 2024, the budget was decreased by EUR 13 227 to align the NCA pension contributions to actual pension cost.

The final amended budget was EUR 56 906 201, adopted by the BoS on 17 December 2024.

In addition to the budget amendments mentioned above, 32 budget transfers were authorised in 2024 in accordance with Article 26 (paragraph 1) of the EBA Financial Regulations. The Management Board was not required to authorise any transfers.

Title	Voted budget *(A)*	Amendments *(B)*	Transfers *(C)*	Final budget *(D = A + B + C)*
I: Staff expenditure	36 859 935	273 127	-590 277	36 542 785
II: Administrative expenditure	10 788 623	-	1 490 186	12 278 809
III: Operational expenditure	8 984 516	-	-899 909	8 084 607
Total	**56 633 074**	**273 127**	**-**	**56 906 201**

Consumption of 2024 internally assigned revenue (C4)

In addition to its voted budget, the EBA had EUR 235 115 in appropriations arising from internally assigned revenue received during the year. These are the funds paid to the EBA by other EU agencies for services rendered or contracts entered into by the EBA on behalf of the other agencies, and include a small amount of cost repayments by staff.

Title	Budget *A*	Committed *B*	% *C=B/A*	Paid *D*	% *E=D/A*	Carry forward *F=A-D*	% *G=F/A*
I: Staff expenditure	54 182	-	-	-	-	54 182	100 %
II: Administrative expenditure	162 108	50 243	31.0 %	50 243	31.0 %	111 865	69 %
III: Operational expenditure	18 825	-	-	-	-	18 825	100 %
TOTAL	**235 115**	**50 243**	**21.4 %**	**50 243**	**21.4 %**	**184 872**	**79 %**

Budgetary execution on 2023 carry forward

In 2024, the EBA executed 97.8% of the EUR 3 563 694 in commitment appropriations carried over from 2023.

Title	Count	Carry forward *A*	Decom mitted *B*	Decom % *C=B/A*	Paid *D*	Paid % *E=D/A*
I: Staff expenditure	35	282 138	15 926	5.6 %	266 212	94.4 %
II: Administrative expenditure	57	1 296 844	40 353	3.1 %	1 256 490	96.9 %
III: Operational expenditure	30	1 984 712	23 598	1.1 %	1 961 115	98.9 %
TOTAL	**122**	**3 563 694**	**79 877**	**2.2 %**	**3 483 817**	**97.8 %**

Procurement

The EBA achieved 95% execution of its 2024 procurement plan.

Procurement statistics – procedures resulting in a signed contract

Type of procedure	Contract(s) signed in 2024 (2023)	Procedures ongoing at end 2024 (2023)
Negotiated: Very low value (≤ €15 000)	12 (18)	2 (1)
Negotiated: Low/Mid-value (€15 000 – €140 000)	4 (2)	0 (0)
Negotiated: under a FWC (no threshold)	1 (1)	1 (0)
Open: publication in the Official Journal (≥ €140 000)	3 (6)	4 (1)
Total	20 (27)	7 (2)

The fall in activity compared to 2023 results from the fact that most FWC are signed for a duration of four years, so most of the FWC signed in 2019 when the EBA moved to Paris were up for renewal in 2023.

Some procedures were unsuccessful in 2024:

- Two open procedures had to be cancelled and relaunched due to internal errors, one resulting in the signing of a contract (refurbishment) and no negative impact on EBA operations, the other being ongoing at year-end (proofreading) resulting in better participation but a period of two months during which the EBA did not have a contractor to which it could send requests for proofreading and editing services.
- One exceptionally negotiated procedure had to be cancelled because the contractor (Dealogic) refused to follow the procurement rules.
- One exceptionally negotiated procedure was removed from the planning as the EBA was able to obtain it under a newly signed Commission framework contract, ultimately resulting in more efficiencies.

Other highlights:

- New framework contracts for mobile telephony and for cleaning services resulted in average monthly cost savings of 43% and 41%, respectively.
- For competitive procurement procedures (i.e. open procedures or procedures where more than one candidate was invited to tender), the EBA received:
    - an average of 3.1 tenders per procedure (median of 3, range 1–6);
    - an average of 13.3 requests for clarification, for a range from zero to 36;
    - zero complaints;
    - zero legal challenges.
- EBA monitors average time-to-award, being the number of days between the launch of a procedure and the signing of the award decision by the Authorising Officer (or non-award decision in the case of a cancellation). The table below presents the statistics for the past three years:

Procurement procedures – average days to award

Procedure type	2022	2023	2024	Average
Restricted	-	222	-	222
Open	99	87	104	94
Reopening of competition	91	-	78	85
Negotiated	44	18	33	27

- The Procurement team gave three training courses to EBA colleagues.

2.3.2 Grant, contribution and service level agreements

In 2022, the three ESAs (EBA, EIOPA and ESMA) each signed a service level agreement (SLA) with DG REFORM, whereby the ESAs provide training services to the EU Supervisory Digital Finance Academy (EU SDFA) and DG REFORM provides funding to the ESAs for staff, missions and sundry other costs. In 2024, the EBA received EUR 356 119 from DG REFORM under this SLA. The SLA will run for three academic years from September 2022; however, given the success of the SDFA, the possibility of an extension is being discussed.

2.3.3 Control results

Throughout the year, the Agency carried out various control activities and assessments, and the results support the assurance of the achievement of the internal control objectives[6] stipulated under Article 30(2) of the EBA's Financial Regulation. The Executive Director and the Management Board are informed of the results of the control activities and assessments, which comprise the following:

- annual internal control self-assessment of the EBA's Internal Control Framework, checking if all the components and principles are present and functioning;
- status of the implementation of open actions resulting from the control activities and assessments;
- analysis of exceptions reporting;
- results and analysis of *ex post* controls on financial transactions;
- status of implementation of audit recommendations and observations issued by the EBA's internal and external auditors;
- status of implementation of actions resulting from the comments and requests issued by the Discharge Authority;
- verification of access rights for the financial system;
- sensitive functions assessment and monitoring of the inventory.

2.3.4 Effectiveness of controls

(i) Legality and regularity of transactions

The EBA uses internal control processes to ensure sound management of risks relating to the legality and regularity of the underlying transactions for which it is responsible, taking into account the nature of the receipts and payments concerned.

(ii) Control objective

The legality and regularity of transactions is ensured by the *ex ante* and *ex post* controls undertaken by the EBA. These controls cover procurement, revenue and expenditure. They are targeted to the specific risks related to each type of action/transaction.

(iii) Assessment of the control results

The *ex ante* controls carried out by the EBA led to quantitative and qualitative benefits in its procurement processes (see Section 2.3.1 and Annex II for details).

The *ex ante* controls on procurement procedures are intended to ensure that the budget is well used, focused on actual needs and that the tender specifications are fit for purpose. Contracts are

[6] 1) 'legality and regularity' of the underlying transactions; 2) sound financial management; 3) prevention/detection/correction and follow-up of irregularities and fraud; 4) reliable reporting and, where applicable, 5) safeguarding of assets and information.

managed to ensure that contractors deliver the services requested as planned and that deviations are proportionately addressed.

2.3.5 Efficiency of controls

The EBA can report excellent results in 2024, having met the target for all major financial performance indicators (see Annex II). This reflects the efforts made to plan and monitor budget execution, to ensure the timely payment of invoices, and to ensure the quality of accounting.

(i) Time-to-pay

As in the previous year, **more than 99% of invoices were paid on time**, with just seven of 893 invoices paid after the deadline (seven days late, on average). Importantly, **no late interest was paid**. The average time-to-pay was 16.6 days.

(ii) Time-to-register

99.6% of invoices were registered on time (i.e. within seven days of reception), with four invoices registered late.

(iii) Time-to-award

For the three open procurement procedures awarded in 2024, **average time-to-award was 104 days** from invitation to tender to the award decision, compared to 87 days in 2023 and 99 days in 2022. The increase in 2024 may be attributed to an increase in the number of tenders received. On the one hand, such an increase tends to result in better value for money, but it can also lengthen the time-to-award due to the resulting increase in workload.

2.3.6 Cost and benefits of controls

Control activities ensure that risks related to the achievement of the organisation's objectives are mitigated at all levels. Consequently, they include a variety of checks and approaches to mitigate risks, through manual and automated controls, both preventive and detective. To be cost-effective, the EBA's controls are designed to achieve the right balance between effectiveness, efficiency and economy.

The calculation method is inspired by the approach used by the European Commission, and it also incorporates elements from the guidelines provided by the Performance Network of EU agencies.

In 2024, the EBA allocated 6.7 FTEs for control activities (A) in the areas of audit, anti-fraud, data protection, ethics, risk management, financial verification and self-assessment, which together with the direct costs (B) amounts to 2.6% of the 2024 executed budget. This cost estimation includes Chapter 11 costs, meaning pensions and salary weighting, excluding costs arising when staff join/leave (daily subsistence allowance, installation allowance, travel and relocation allowance). Compared to the previous year, where 8.8 FTEs were allocated, the reduction reflects greater efficiency found in the respective areas, leading to a streamlined approach while still ensuring effective control and oversight.

Control activities costs (A)

Area of activity	TOTAL FTEs
Financial Management, including Procurement, Budget & Accounting	3.6
Governance, risk and compliance	3.0
Adequate, safe and secure work environment	0.1
TOTAL	6.7 **(2.4 % of the executed budget)**

The direct costs (B) refer to the costs which are incurred in support of the control activities and include the external audit.

Direct control costs (B)

Item	Amount in EUR
Data protection consultancy	10 800
Treasury Services, ABAC	65 000
External audit of provisional and final accounts	35 854
TOTAL	111 654 **(0.2% of the executed budget)**

In terms of the effectiveness of the controls, the European Court of Auditors has given the EBA an unqualified opinion on the 2024 accounts. In addition, given the overall conclusion on the maturity of the internal control system, the EBA has assessed the effectiveness, efficiency and economy of its control system and reached a positive conclusion on the cost-effectiveness of the controls.

With a special focus on compliance while ensuring performance, the EBA has implemented a set of controls aiming to bring benefits to the Agency. These can be demonstrated by the following elements:

- compliance with regulatory requirements;
- reliable reporting that supports the decision-making process on items related to resources allocation and budget implementation;
- clean accounts, reliable recordkeeping and integrity of data;
- increased efficiency among the functions and processes;
- prevention of conflicts of interest;
- the European Parliament granting annual discharge on the implementation of the budget to the Executive Director;

- continuous unqualified ECA opinion on the accounts;
- a reduced number of audit observations and recommendations, as well as the implementation of the agreed actions within short timelines.

The controls in place are considered adequate and proportionate to the risks they serve to mitigate. They provide reasonable assurance that the budget has been effectively executed in compliance with the regulations. The Agency reviews its internal control procedures and policies on a continuous basis to implement improvements, manage risk and ensure a proportionate balance between the costs and benefits of controls.

2.4 Delegation and sub-delegation

As per Article 64(1) of the EBA Founding Regulation (Regulation (EU) No 1093/2010), the Executive Director of the EBA 'shall act as Authorising Officer and shall implement the Authority's annual budget'. The Executive Director has delegated Authorising Officer powers to six staff members, via permanent delegations:

- Director of Operations: all budget lines, all transactions, with no monetary limit. This is an indefinite delegation with no time limit.
- Head of Finance & Procurement: all budget lines, all transactions, with no monetary limit on Chapter 11 budget lines and with an EUR 60 000 limit per transaction on all other budget lines.
- Two members of the Finance & Procurement team, all budget lines, payment transactions only, up to EUR 15 000.
- Two corporate support staff members: mission purchase orders only, with no monetary limit.

The delegations are valid for the remaining duration of the employment contracts of the staff members in question, when they are revoked.

In addition, for the month of July, the Executive Director delegated Authorising Officer powers to the Head of Finance & Procurement as follows: all budget lines, all transactions, with no monetary limit.

There are no delegations from AOD to other staff.

2.4.1 Controls

Details of all financial circuit delegations are maintained in a SharePoint online list, to which copies of signed delegations are attached. Automated notifications are circulated six weeks prior to the expiration of a delegation.

Annually, the EBA IT security officer carries out a verification exercise on these delegations and on their implementation in the ABAC system, and reports on this exercise in accordance with the instructions received from DG BUDG. Following the last exercise, the finance unit updated the data held in the SharePoint list to ensure that the same codes were used for ABAC roles and profiles as are used in ABAC, to make it easier to compare the data in the list with the ABAC security reports.

The Court of Auditors are provided with the data from the list and with the ABAC security reports. The Court reported no issues in 2024.

Within the finance unit, monthly controls are carried out to compare the ABAC security reports with the data in the list, with the ABAC security reports being generated automatically on the first day of every month.

2.5 Human resources management

2024 Key indicators

In 2024, the EBA achieved high HR management results. In particular, its posts are almost all filled, time to recruit is short and staff satisfaction is very high.

HR area	Indicator	Indicative target	2024	2023
Workforce	Temporary Agents posts filled (a)	> 95% (EUAN benchmark)	98% (162/166)(b)	99% (161)
	Contract Agents posts filled (a)	> 85% (EUAN benchmark)	100% (52/52)(c)	98% (49)
Recruitment	Time to hire (from publication to decision)	[3-6] months (EUAN benchmark)	3.86 months	3.4 months
Staff care	Staff Engagement Survey (SES) satisfaction score	65% (EUAN benchmark)	72%	65% (2022)
Diversity & inclusion	Women in management	> 40% (Commission baseline)	60% Directors, 41% HoUs	60% Directors, 41% HoUs

Notes:

(a) Refers to the Establishment Plan for the given year.

- TA: 166 Temporary Agents EU/NCA-funded posts (including 1 SDFA, 2 MiCA and 1 DORA).
- CA: 52 Contract Agents positions (including 2 MiCA). 1 SDFA is not shown above, as per Commission reporting request.
- SNE: 19 positions.

(b) Includes four temporary agent offers made by 31 December 2024.

(c) Includes two contract agent offers made by 31 December 2024.

The above HR KPIs and other indicators (see factsheet below) are all linked to the EBA's talent strategy, and help monitor the organisation's HR performance at the different stages of employee life cycle.

HR factsheet:

HR area	Indicator	Target	2024	2023
Workforce	Cost-paid SNE positions filled	As per agency capacity	79% (15/19)	74% (14)
	Cost-free SNEs	As per agency capacity	9	13
Recruitment	Staff in external mobility	As per agency capacity	14	2
	Staff in internal mobility	As per agency capacity	13	6
	Statutory staff (TAs + CAs) turnover rate	< 10% (EUAN benchmark)	3%	6%
Outreach	Trainees	As per agency capacity	24	25
	Interns (aged 14-19)	None	34	15
	Short-term SNEs/visiting guests	None	6	1
Staff care	Staff Engagement Survey (SES) participation score	72% (Commission baseline)	85%	71% (2022)
	Sick / parental leave per staff per month	< 2 days/month (EUAN benchmark) 2024	0.28 (3.2 FTE) 0.20 (1.91 FTE)	0.57 (6.25 FTE) 0.18 (1.80 FTE)
Learning & development	No. of training days per staff per year	> 5 (EUAN, industry benchmark)	7.91	6.15
	Harassment awareness sessions	At least 2 sessions / year	5	9
	Staff attending language courses	None	121	140
	Nationalities of staff (TAs+CAs)	27 EU Member States	100%	100%
	Women in statutory staff (TAs+CAs)	> 40% (Commission baseline)	50%	50%

Brief description of the results of the screening / benchmarking exercise

In 2024, the EBA continued to apply the benchmarking exercise following the methodology of the European Commission. The table in Annex IV depicts the results of the exercise based on the type of post: Administrative Support and Coordination, Operational and Neutral. Overall, the share of jobs allocated to the three screening types remains relatively stable, with slight variations linked to the decrease in consultants in the IT area.

2.6 Strategy for efficiency gains

The EBA's strategy for efficiency gains relies on three pillars: a flexible organisation, modern tools, and a collaborative approach. This allowed the EBA to achieve its work programme at very high levels in recent years, despite a substantial number of new requests and no additional resources (the share of executed tasks of these respective years' work programmes was 91% in 2021, 94% in 2022, and 95% in 2023), and is expected – based on provisional results – to reach the self-imposed target of 90% in 2024.

Flexible organisation

Portfolio of activities. To facilitate internal synergies and cross-fertilisation, the EBA is constantly reviewing its portfolio of activities and streamlined the total number of activities from 37 to 25 in 2022, and to 19 as from 2023. As encouraged by the BoS, it will intensify its efforts to better relate inputs and outputs to the complexity and intended outcomes of its tasks (scoping notes for better simplicity and proportionality). The EBA has reduced the relative share of its administrative support and coordination to business resources (11.6% vs 84.6%) and is preparing for onboarding new-fee-funded staff without requesting new HR, IT or Finance resources.

Living organisation. Evolutions in the set-up are regularly introduced to best tackle evolving activities. This included creating, in 2021, a standalone data department and dedicated AML, ESG, and Reporting and Transparency units, to reorganise the set-up for equivalence and for Q&A in 2022. In 2023 and 2024, approximately 25 FTEs were redeployed to DORA and MiCA policy and oversight preparatory work (including 36 mandates for technical standards, guidelines, advice, etc.) which resulted in other tasks being temporarily streamlined or postponed. For cross-cutting tasks, temporary team leaders coordinate internal resources and keep focus. In 2024, the EBA introduced a Joint Oversight Venture (see below).

Planning and controlling. The dynamic allocation of resources is facilitated by an activities-based tool developed in-house with a rolling 3-year horizon: the EBA's Tool for Handling Operations and Resources (THOR) was piloted in 2022 (in Excel) and rolled out since 2023 (Access Database). Since 2024, an internal Task force on Accountability, Synergies and Consistency (TASC) strives to optimise the cost efficiency and consistency of all EBA documents prepared for purposes of planning and accountability.

Working arrangements and sustainability. The EBA has introduced hybrid work, implementing the Commission's decision by analogy in June 2022. It will continue its efforts towards creating a flexible, digital, sustainable and efficient workplace. In line with its EMAS registration by French authorities in 2022, it has reduced its business travel by half compared with 2019 and only commissions energy from renewable sources. It continuously invests in improving its environmental performance and reducing its carbon footprint (decarbonising operations and implementing circular economy principles: see also Annex VII).

Modern tools

The EBA's Horizon 2029 Talent strategy. This supports staff engagement, performance and development for the benefit both of staff (to retain a high level of qualification and motivation) and the organisation (to have the right skillsets and reach its objectives). The strategy's first achievements included internal and external mobility (10 personnel swap arrangements with other authorities in 2025 vs 5 in 2024); induction visits with the Commission; outreach (short-term expert onboarding, alumni network); staff care (e.g. wellbeing, D&I, Mental Health First aiders); the leadership programme. Results look encouraging with staff satisfaction at 72% in the 2024 Staff Engagement Survey and 85% participation (+7 and +14 ppt vs 2022).

The EBA's 2020–2025 IT strategy. This allowed to embed new technologies, with expected long-lasting gains. A collaboration platform has reduced emails and supports integrated operating models (replacement of the extranet; DORA oversight collaboration space for approximately 30 ESA and 90 external JET members). The move to cloud-based big data technologies has benefited the new stress-test modules (NII), among others. The EBA is exploring AI use cases, which could bring productivity gains to its processes. Virtual-LEIs may ease workload and secure collections from banks (Pillar3 Data Hub) and issuers of crypto assets (MiCA reporting – see below). Key HR processes are being digitalised and a more interactive Single Rulebook is envisaged. An enterprise-level Identity and Access Management capability will provide less labour-intensive role-based access for both internals and externals in over 48 information systems.

Data collection and dissemination. EUCLID (the EBA's European Centralised Infrastructure of Data) and EDAP (the EBA's Dissemination platform) enable data flows between diverse endpoints and provide access to high-quality, curated data and insights to internal and external stakeholders. Both platforms will be expanded to MiCA, Pillar 3 disclosures and, from 2026, to PSD3, PSR, FIDA and EMIR datasets.

Collaborative approaches

Competent Authorities (CAs). The EBA collaborates closely with Competent Authorities in the 27 Member States and the EEA: approximately 1 500 of their staff members are involved in its governing bodies and working structures. This provides first-hand expertise and synergies, and allows the EBA and CAs to complement each other, especially in the context of new responsibilities, such as crypto asset supervision, for which a coordination group operated in 2023–2024 to prepare for the new tasks. This was also the case for DORA, including through collaboration with ENISA for the use of their reporting platform (CIRAS) for starting cyber incident reporting.

Reporting. The EBA and EIOPA have developed a common data point model for the insurance, pension fund and banking sectors (DPM 2.0) for more efficient data modelling, use cases, and data types in supervisory reporting. The ECB will also use it for its own next generation data platforms (iREF). In 2024, the EBA, EIOPA and ECB started a DPM Alliance to jointly govern the future use, evolution and support of DPM2.0, for the benefit of Competent Authorities, Vendors and supervised entities. The EBA and EIOPA have jointly developed DPM Studio, a digital regulatory reporting software product that allows them, the ECB and CAs to efficiently model reporting requirements in the insurance, pension fund and banking sectors using the DPM 2.0 standard. The EBA and EIOPA will make the source code of DPM Studio available to interested NCAs for optimising their own reporting activities. Finally, the EBA has started a cost-benefit assessment of least-used harmonised reporting.

DORA Joint Oversight Venture. To tackle their new oversight responsibilities over CTPPs, the EBA will be pooling resources with EIOPA and the EBA in a common department reporting to the three Executive Directors. This approach is a first between EU agencies. It will bring consistency regarding the way the activities are carried out and reap substantial synergies (no duplications, one reporting line, internalised coordination, joint recruitments, easier allocation of resources among the three ESAs over time).

MiCA reporting. In 2025, the EBA and CAs will develop a creative approach to collect reporting from issuers of ARTs and EMTs. Rather than having authorities each develop separate reporting systems, a common platform derived from the EBA's EUCLID will provide a unique and stable reporting point for issuers, allow authorities to access more timely information on both the issuers' activities and the market as a whole, creating new synergies and lowering costs.

Procurement. The EBA systematically seeks to include other agencies in its procurement procedures. In 2024, the EBA was lead agency on six interinstitutional procurement procedures, with a total value estimated at EUR 7 401 123 in which a total of 26 other agencies participated. The EBA also participates in many interinstitutional procedures led by other EU entities, predominantly those run by the Commission. Interinstitutional procurement is particularly strong with the ESMA and the other Paris-based EU entities. In 2024, 74% of the EBA's 172 framework contracts in force (resulting from 77 procurement procedures) were procured by other EU entities – see the table below.

Procurements Lead:	EBA	COM	Other agencies	Other	Total
Procurement procedures completed	6	12	9	1	25
Framework contracts	45	73	40	14	172

ESAs. The Joint Committee of the EBA, EIOPA and the ESMA with the Commission and the ESRB is a key forum for discussing common regulatory issues and agreeing joint initiatives. It enables these entities to devise common approaches for a number of cross-cutting areas, such as financial risk assessments, ESG and financial conglomerates. A recent achievement was the Fit-for-55 stress-test carried out under its aegis. It will prove instrumental in coming years for tackling topics like ESG again, NBFI, European Savings and Investment Union, oversight of critical ICT third-party providers under DORA, and securitisation, among others. The ESA's senior management and experts also have ongoing dialogue to align on organisational issues of common interest.

EU agencies. The EBA actively contributes to the two key pillars of the EU Agencies Network's multi-annual strategy (1) EU Agencies as role models for administrative excellence (2) EUAN as a valued institutional partner, by increasing efficiency through better sharing of services, knowledge, best practices and pooling of tasks (e.g. SLA on providing a procurement resource part-time to the Community Plant Variety Office (CPVO)).

Accounting. The EBA has been sharing an accounting function with the ESMA since 2021 to enhance the synergies between the two Paris-based authorities. The arrangement also includes EIOPA's Accounting Officer for reciprocal back up.

Public cloud. The EBA and EIOPA jointly migrated to Public Cloud in 2023–2024 using the Commission's Cloud-2 framework contract. Following the migration (2023/2024), both agencies continue to collaborate daily in the usage of the MC10, sharing ideas and joining forces in optimising costs, security hardening, change orchestration with their common vendor, best practice-sharing.

Security Officer. The EBA has close collaboration with EIOPA and the ESMA, which have also migrated to Public Cloud, have required similar Cloud Transformation programmes, and are faced with the same security rules and regulations. While they work together to prepare for upcoming security framework changes such as the Cybersecurity Regulation, sharing current security resources will not be sufficient to meet the number of roles and diligences at agency-level which are required by the new legislation.

Knowledge-sharing. The EBA's FinTech Knowledge Hub gathers CAs to engage with incumbents, new entrants, FinTech firms, technology providers and other relevant parties. It aims to enhance the monitoring of financial innovation, share knowledge about FinTech, and foster technological neutrality in regulatory and supervisory approaches. In the same vein, the ESAs' European Forum for Innovation Facilitators (EFIF) provides a platform for supervisors to share insights from engagement with innovation facilitators (regulatory sandboxes and innovation hubs), technological expertise, and to reach common views on the regulatory treatment of innovative products, services and business models, overall benefiting bilateral and multilateral coordination.

2.7 Assessment of audit and *ex post* evaluation results during the reporting year

2.7.1 Internal Audit Service (IAS)

In line with international professional auditing standards, the IAS established a multi-annual audit plan (Strategic Audit Plan 2022–2024), which is being reviewed annually taking into account important organisational and/or external developments that may have impacted the risk profile of the EBA.

IAS audits performed in 2024 for HR Management and Ethics and for IT governance and portfolio management concluded there were adequate set-ups.

Audits – 2024	Summary
Human Resources Management and Ethics	The objective of the audit was to assess the design, effectiveness and efficiency of the internal control system put in place by the EBA to manage its human resources and the adequacy and effectiveness of its ethics framework. All the recommendations have been accepted by the EBA, none of them being critical or very important, and the action plan prepared was considered adequate by the auditors.
Multi-entity audit on coordination between DG FISMA and the decentralised agencies the EBA, EIOPA and ESMA	The objective of the audit is to assess the efficiency and effectiveness of the coordination between DG FISMA and the three European Supervisory Authorities on financial services. The audit is to be finalised in 2025.
IT governance and portfolio management	The objective of the audit is to assess the adequacy of the design and the effective and efficient implementation of IT governance and IT portfolio management processes in the EBA. The audit is to be finalised in 2025.

2.7.2 Internal Audit Capability (IAC)

The EBA's internal audit function is provided by the Commission's Internal Audit Service (IAS), which remains the official internal auditor of the Authority.

2.7.3 European Court of Auditors (ECA)

The ECA draft audit report on the 2024 audit identified no observations.

2.8

2.8.a) Follow-up of recommendations and action plans for audits and evaluations

Internal Audit Service (IAS)

The EBA had no new or overdue critical or very important recommendations from the IAS.

The EBA continued implementation of audit recommendations stemming from the following audits:

Audits	Action plan – progress implementation
Supervisory Reporting and Data Quality	All recommendations closed (five recommendations issued, of which two remaining were closed in 2024)
Internal Control Framework and Risk Management	All of the recommendations closed (four recommendations overall, all closed in 2024)
Human Resources Management and Ethics	The audit confirmed that no critical or very important recommendations were identified. The IAS saw opportunities for further enhancement in strategic workforce planning processes, in performance management with the introduction of RACER objectives, and in the recruitment of junior profiles in relation to the years of professional experience of candidates. Of the five recommendations for improvements issued, two are already on track for closure in 2025, while the remaining three are set for implementation by December 2025 in line with the approved action plan.

The IAS concluded that, overall, the internal control system put in place by the EBA to manage its human resources and its ethics framework are adequately designed and effectively and efficiently implemented to support the achievement of its operational goals.

Internal Audit Capability (IAC)

Not applicable

European Court of Auditors (ECA)

In the Annex to its 2024 draft report, the Court listed one observation that it followed up from previous years. This is shown below, along with the status of corrective action taken by the EBA.

The ECA's observation (summary)	Corrective action taken and / or other relevant developments (summary)
We audited a procurement procedure for 'blockchain analytics services and crypto assets markets data', with an estimated value of €360 000, which resulted in multiple framework contracts. We found that three tenderers that did not meet the financial European Banking Authority (EBA) capacity requirements – because they could only provide two years of financial statements instead of three, as required – were nevertheless allowed to participate in the procedure. One of the three was awarded a contract as the second-ranked tenderer in the cascade. This breached Article 167(1) of the Financial Regulation, as well as the principle of transparency and equal treatment. In 2023, the EBA did not make any payments to this contractor, because so far it has only used the services of the first-ranked contractor.	Regarding this particular procurement procedure, in the planned reopening of competition, for the second two of the four years of the framework contract, the EBA will not run the reopening of competition for Lot 1, which is the lot under which a contract was awarded to the second-ranked tenderer referred to by the Court. Hence no payments will ever be made to the contractor subject to the ECA's observation. In its procurement checklist developed this year, the EBA has included reference to this issue of procurement in a nascent industry and the adjustment of the financial capacity evidence to young economic operators accordingly. This evidence will be clearly stated in future tender specifications.

In its draft audit report on the 2024 audit, ECA marked this observation as closed.

Evaluations

The EBA is subject to regular reviews by the EU institutions, in accordance with Article 81 of the EBA (and other two ESAs') Regulations. The most recent assessment report on the operation of the European Supervisory Authorities (ESAs) was published on 23 May 2022[7].

The Commission concluded that: 'Since the last ESA review in 2019, the ESAs have continued to perform their tasks efficiently and effectively, including during the recent challenging circumstances caused by the COVID-19 pandemic'. It also identified 'some areas where improvements (which) could be implemented with no need for legislative changes, and (it) will cooperate with the ESAs to assess this further', mainly with the aim 'to promote supervisory convergence and consistent supervision, which is a key building block in creating a genuine Capital Markets Union'.

In particular, it underlined the increasing number of cross-sectoral tasks and topics that must be dealt with by the ESAs as part of the JC. As a consequence, the Commission invited the ESAs to reflect on desirable changes that could be made to the framework in the future, to ensure sufficient resources and improve the decision-making process. The ESAs made progress in fostering supervisory convergence in the area of enforcement and supervisory independence (see

[7] https://finance.ec.europa.eu/system/files/2022-05/220523-esas-operations-report_en.pdf.

joint criteria published on their websites[8]). Partial progress was also made regarding the recommendation to consider ways to ensure sufficient resources and improve decision-making in the JC, although the scope of action is limited given that the legal framework sets clear rules on the JC's governance and functioning. In the absence of legislative changes, the ESAs have therefore been focusing on enhancing good governance and efficient operations within the JC on aspects under the ESAs' control that do not require legislative changes.

Further accountability and evaluations are ensured by:

- The European Parliament, in its role as authority responsible for the discharge of the EBA's financial statements, but also by way of the yearly hearing that the EBA Chairperson attends at the EP's ECON committee.
- The European Court of Auditors, the Commission's Internal Audit Services, and the yearly external financial audits.
- The publication of the EBA'S Consolidated Annual Activity Report and Annual Report, which provide an overview of the execution of the work programme and more detail on the above external evaluations.

2.8.b) Follow-up of recommendations issued following investigations by OLAF

There were no recommendations issued by OLAF to be followed up in 2024.

2.9 Follow-up of observations from the discharge authority

On 11 April 2024 the European Parliament (EP) granted discharge to the Executive Director of the European Banking Authority (EBA) for the 2022 financial year and approved the closure of the accounts for that financial year. In that context, the EP also set out its observations in a resolution.

Equally, the EBA welcomed the feedback received during the discharge process, which is an essential exercise for the evaluation of the Authority's performance. It provides an external point of view to the actions undertaken by the Authority during the year, as well as current practices.

The 29 observations issued by the discharge authority in the 2022 report represented another improvement compared to the previous year(s) in terms of substance.

[8] Joint Committee of the ESAs, 'Joint European Supervisory Authorities' criteria on the independence of supervisory authorities' (https://www.eba.europa.eu/sites/default/documents/files/document_library/Publications/Other%20publications/2023/1063223/JC%202023%2017%20Joint%20ESAs%20Supervisory%20Independence%20criteria.pdf), JC 2023 17, 25 October 2023.

The EBA published an Opinion on the European Parliament 2022 discharge report in July 2024, with responses to the observations received in the Parliament's resolution, in particular on those with a call for follow-up action[9].

Overall, the EBA considered that the large majority of the observations did not require follow-up actions or had already been addressed. A small number of observations are the subject of continuous efforts to ensure good governance, processes and management.

A few specific observations in the area of procurement and the related EBA reactions are set out below.

Observations of the Discharge Authority	EBA response and measures taken	Status
[The Discharge Authority] Notes that, according to the Court, the Authority sought to procure services in two open tenders, one for market research for financial services and another for consultation on data protection; notes that in one tender there was an overlap between the selection and award criteria; highlights that such an overlap goes against Article 167 of the Financial Regulation, which stipulates that there must be complete separation between selection and award criteria; states that selection criteria are used to evaluate the capacity of the tenderers and award criteria are used to evaluate the price and quality of the offers; notes with regret that, in both cases, the Authority overestimated the maximum value of the contracts because of shortcomings in the research on market prices it had carried out before launching the tender.	The EBA takes note of the Discharge Authority's observation in relation to procurement procedures. One section in the EBA's updated guidance for selection committees relates specifically to the distinction between award and selection criteria. The EBA conducts market research by publishing 'prior information notices' in the Official Journal, in which it invites companies to respond to a questionnaire (public consultation) and asks for indicative prices to help it estimate contract value. In its 2023 audit report, the Court indicated that this observation is closed, indicating that the actions taken by the EBA are sufficient to address the observation.	Measures to address observation implemented and accepted by Court. Observation closed.
Notes that, according to the Court, the procurement weakness affecting two separate negotiated procedures reported in 2021 have been corrected as the Authority is now using the Commission's templates, thereby bringing its procedures into line with the Court's observation.	The EBA takes note of the Discharge Authority's observation in relation to the use of Commission templates in procurement procedures, thereby bringing them in line with the Court's observation.	Measures to address observation implemented and accepted by Court. Observation closed.

[9] https://www.eba.europa.eu/sites/default/files/2024-07/be32386a-c337-4a0c-94b3-fc78b5ef8822/Opinion%20EBA%20follow-up%20to%20the%202022%20Discharge%20Report%20of%20the%20European%20Parliament.pdf

Observations of the Discharge Authority	EBA response and measures taken	Status
Highlights that, since the 2020 financial year, the Court has raised new procurement-related observations every year for four agencies, including the Authority; recalls that the objective of public procurement rules is to enable procuring entities to obtain the goods and services they need at the best price, while ensuring fair competition between tenderers and compliance with the principles of transparency, proportionality, equal treatment and non-discrimination; calls on the Authority to ensure full compliance with the applicable procurement rules to achieve the best possible value for money.	The EBA takes note of the Discharge Authority's observation in relation to procurement. The EBA strives to achieve full compliance with the Financial Regulation and applicable procurement rules. The EBA considers the Court's comments to be a useful input to the EBA's ongoing work to be fully compliant. Other activities engaged in by the EBA as part of this work include: • EBA procurement staff regularly attend Commission training sessions and are active participants in the Agencies Network of Procurement Officers. • EBA procurement staff conduct regular training sessions within the EBA for staff involved in procurement procedures and contract management. • The EBA conducts a lessons learned exercise after every competitive procurement procedure. • The EBA continually updates its procurement process manual and guidelines, and communicates improvements internally. • The EBA maintains a system of follow-up on internal control improvements, to ensure timely and appropriate action on agreed improvements.	This represents an ongoing effort.

There are no outstanding or open issues with observations made in previous Discharge Authority reports, and hence no delays in terms of implementation.

2.10 Environmental management

In 2024, the EBA maintained its EMAS registration. The 2024 environmental statement (with data from 2023) was positively verified and validated by independent external auditors and is now available on the EBA website here: https://www.eba.europa.eu/about-us/sustainable-eba.

The EBA was invited by the Community Plant Variety Office (CPVO), a European agency in Angers, France, to deliver a presentation on 29 January 2024 about its EMAS journey as well as greening activities and best practices we have put in place in the agency. Organised in collaboration with the CPVO's management, staff and greening network, the event highlighted the benefits of implementing EMAS and was a testament to the significance of collaboration among European Union agencies.

The EBA continued to actively promote EMAS, environmental management and sustainability within the EU Agencies Network.

The EBA, together with the ESMA and EIOPA, participated for the second time in Interinstitutional EMAS Days. The ESAs' presentation 'Sustainable finance: tools for mitigating climate-related risks' ranked in the top three most frequented sessions of this annual event for EMAS-registered organisations.

The EBA managed to achieve all its 2024 environmental objectives.

2.11 Assessment by management

2.14.1 Overall budget implementation rate

In 2024, the EBA reached one of its highest levels of budget execution: 99.9% execution on a total voted 2024 budget (after amendments) of EUR 56 906 201.

Execution of the appropriations carried forward from 2023 was 97.8%.

In both cases, the execution rate was above the ECA's recommended threshold of 95%.

2.14.2 Legality and regularity

The control activities carried out on 2024 financial transactions and on the 2024 accounts included *ex ante* and *ex post* controls conducted by EBA staff, and the annual audit carried out by the ECA and PKF. Overall, these showed that verified transactions were in all material aspects legal and regular. In its 2024 annual report, the ECA made one observation on the legality and regularity of transactions, which is covered in more detail in Section 2.7.3.

2.14.3 Validation of the accounting system

Since June 2011, the EBA has been using the accounting systems provided by the European Commission, which include ABAC Workflow for budgetary accounting, ABAC Accounting for financial reporting and ABAC Assets for the management of fixed assets. The ABAC system is the property of and is regularly validated by the Accounting Officer of the European Commission.

In December 2024, the financial systems of the EBA were validated by the Accounting Officer in compliance with Article 49(e) of the EBA Financial Regulation.

Part III – Assessment of the effectiveness of the internal control systems

3.1 Effectiveness of internal control systems

3.1.1 Methodology applied for the assessment of the effectiveness of the internal control system

EBA assesses the effectiveness of the internal control system by assessing the implementation of the Internal Control Framework, including the implementation of the defined indicators, and by evaluating the main shortcomings identified by the EBA itself or reported by others, including the Internal Audit Services and the European Court of Auditors.

3.1.2 Internal control framework

The EBA's Internal Control Standards (ICS) are based on the Commission's ICS. They are approved by the Management Board and implemented within the organisation through the adoption of detailed implementing rules and related procedures.

In January 2019, the Management Board adopted the revised Internal Control Framework, which is in line with the model of the European Commission and the Committee of Sponsoring Organisations (COSO). The revised framework entered into force on the day following its adoption.

The framework consists of five internal control components and 17 principles, which are further developed in 49 characteristics. The EBA has assessed the presence and proper functioning of each principle (17 principles) and aggregated all the results at the component level (five components) and, ultimately, at the level of the Internal Control Framework as a whole.

The EBA monitoring cycle of the EBA's internal control system is based on ongoing activities and specific periodic assessments. The deficiencies identified in the context of the monitoring activities are important elements that are taken into account in the annual assessment of the presence and functioning of the internal control system. Moreover, the methodology on the basis of which the annual assessment is conducted also includes an in-depth analysis of a set of indicators measured individually or via staff surveys and audit results. The indicators and related monitoring data are discussed and approved on an annual basis by the EBA's Executive Director.

The assessment of the ICF for 2024 was performed and the main conclusions were as follows:

- The IAS concluded that, overall, the internal control system put in place by the EBA to manage its human resources and its ethics framework are adequately designed and effectively and efficiently implemented to support the achievement of its operational goals. There were no very important recommendations issued, and the action plan proposed by the EBA has been assessed as adequate.

- The self-assessment performed in relation to the implementation of the Internal Control Framework showed that the internal system is present and functioning well, with only minor improvements needed.
- At the component level, all of them are present and functioning well, with only minor improvements needed.
- At the principles level, all of them are present and functioning well, with only six principles requiring minor improvements.
- The analysis of the internal control monitoring criteria showed that out of 67 indicators, 63 reached the established target, while four indicators did not, compared with eight in 2023, thus showing a significant improvement over a 12-month period.

3.1.3 Risk Management

Regarding the COSO Enterprise Risk Management (ERM) Framework, work had started in 2021 with Deloitte to enhance the compatibility of the EBA's risk management with the COSO ERM Framework, with the following main pillars for managing the ERM having been developed:

- An ERM policy, defining the overall ERM practices, as well as a risk appetite/risk tolerance statement, summarising the EBA's appetite for risk in a whole range of activities.
- An ERM lifecycle document explaining in detail the different steps/phases to be considered over the course of one year, including detailed indications of the different stakeholders and lines of defences involved in each step. The ERM lifecycle exists to generate and maintain a stream of data and information, recorded in the EBA's risk register, on the basis of which the EBA's management can make risk-informed decisions;
- The strategic risk register;
- The identification of specific risks requiring additional mitigation measures.

Initially containing 15 strategic risks, following interviews with Directors and Heads of Units, two strategic risks were added to the register for 2024, taking the overall number to 17. Six of those risks were identified as needing extra mitigation measures, which were followed up on throughout the year, with progress on individual measures being reported on a regular basis to the Management Board. In addition, ERM developments were in 2024 also added as a regular topic for discussion in senior management and directors' meetings.

3.1.4 Ethics guidelines and conflicts of interest policy

The EBA has in place ethics guidelines and policies on conflicts of interest setting out rules and expected behaviours to ensure that its staff act with independence, impartiality, objectivity and loyalty, and in a transparent way.

EBA staff and members of the EBA's governing bodies must submit annually a declaration of interests disclosing any interests that may conflict with the EBA's legitimate interests. The declarations of members of the governing bodies are published on the EBA's website, and so are those of the EBA's Chairperson, Executive Director and Directors. Alongside this regular obligation, all such actors are also reminded of their obligation to declare interests at any time in between the submission of annual declarations.

In 2024, the Risk and Compliance Team, which supports the Ethics Officer's work on ethics, processed an increased number of EBA staff ethics requests (495 requests) and continued refining the Ethics workflow, which is the system put into place for streamlining the handling of ethics requests of EBA staff. Furthermore, work has started, together with the other ESAs, for the adaptation of the conflicts of interest policy for non-staff to the new powers conferred to the EBA under DORA and MiCA.

The EBA continues to publish on its website detailed information on occupational activities that staff undertake after leaving the EBA, as recommended by the European Ombudsman in its decision in case SI/2/2017/NF.7.

3.1.5 Anti-fraud strategy

The EBA's anti-fraud strategy was adopted on 22 January 2020, covering a period of five years and is implemented primarily through annual anti-fraud risk assessments (AFRA). The objective of performing an AFRA is to identify potential fraud risks in all areas of activity of the EBA and to prevent occurrence by ensuring appropriate controls are in place. It sets out fraud risk scenarios and assesses their severity and likelihood, identifying and taking into account existing controls and assessing their adequacy.

The last AFRA, which was finalised in Q2 2024, assessed five main areas: misappropriation and theft of EU funds and resources, lack of adequate declarations of interests by staff members, abuse of position in return for promise of favour, the leaking of sensitive information and IT breaches. The Risk and Compliance Team started developing, on the basis of the results of this AFRA, a 2025–2027 Anti-Fraud Strategy which follows the *European Commission's methodology and guidance for the Anti-fraud Strategies of EU Decentralised Agencies and Joint Undertakings,* and which should be adopted by the Management Board in Q1 of 2025.

The Risk and Compliance team continued its prevention and detection work through mandatory ethics training for new joiners and all staff, in which a part is dedicated to anti-fraud. This training ensures that staff are aware of what fraud is, what can give rise to it, and what whistleblowing routes and protections are available to them to report fraud without fear of retaliation. There has been no detected fraud or EBA/OLAF investigation in 2024.

3.2 Conclusions of the assessment of internal control systems

Following the 2024 in-depth analysis of the results obtained during the annual assessment (including the results obtained from ongoing monitoring), it was found that there are no critical risks that could affect the EBA's achievement of its objectives. All the components and principles are present and functioning as intended, but several principles were noted that would benefit from adjustments and improvements that would enhance the efficiency and effectiveness of the principle and its elements.

Five Internal Control Components:

1. **Control Environment**
   Category 1 (Fully Effective):
   The component is present and functioning well, only minor improvements needed.
2. **Risk Assessment**
   Category 1 (Fully Effective):
   The component is present and functioning well, only minor improvements needed.
3. **Control Activities**
   Category 1 (Fully Effective):
   The component is present and functioning well, only minor improvements needed.
4. **Information and Communication**
   Category 1 (Fully Effective):
   The component is present and functioning well, only minor improvements needed.
5. **Monitoring Activities**
   Category 1 (Fully Effective):
   The component is present and functioning well, only minor improvements needed.

With a view to upholding and enhancing the internal controls as a whole, strengthening the approach to compliance and performance in terms of further embedding compliance in day-to-day work, the EBA will strengthen development and monitoring of risk mitigation plans for relevant strategic risks, commence implementation of a new anti-fraud policy and strategy, update ethics requirements to take into account new tasks of the EBA, and establish enhanced oversight of management of sensitive data.

3.3 Statement of the manager in charge of risk management and internal controls

I the undersigned, in my capacity as Internal Control Coordinator, declare that in accordance with the EBA's Internal Control Framework I have reported my advice and recommendations on the overall state of internal control at the Authority to the Executive Director.

I hereby certify that the information provided in this Annual Report and in its annexes is, to the best of my knowledge, accurate, reliable and complete.

Paris, 30 June 2025

Peter Mihalik
Internal Control Coordinator

I the undersigned declare that I have reported my recommendations on the state of risk management in the European Banking Authority to the Executive Director and to the Management Board.

I hereby certify that the management reporting on the state of risk management is, to the best of my knowledge, accurate and complete.

Paris, 30 June 2025

Jonathan Overett Somnier
Risk Manager

Part IV – Management assurance

4.1 Review of the elements supporting assurance

The building blocks of assurance that are in place and were available to the Executive Director in 2024 are outlined below:

- Audits: throughout 2024, all the remaining recommendations stemming from the Supervisory Reporting and Data Quality and Internal Control Framework and Risk Management audits have been closed. The report on Human Resources Management and Ethics has been validated and an action plan subsequently approved. The IAS concluded that, overall, the internal control system put in place by the EBA to manage its human resources and its ethics framework is adequately designed and effectively and efficiently implemented to support the achievement of its operational goals.
- Monitoring and reporting: this includes, for example, a thorough planning cycle with meetings with all units; regular reports to the Management Board; monthly, quarterly and ad hoc internal reporting; and regular *ex post* control exercises on selected samples of transactions.
- Certification of the Authority's year-end accounts by the Accounting Officer: the Accounting Officer's certification of the 2024 provisional accounts transmitted by 1 March 2025 provided reasonable assurance to the Executive Director that the accounts present a true and fair view of the Authority's financial situation.
- Internal controls: the Internal Control Coordinator ensures the effectiveness of the Authority's internal control systems, which was attested to by the Internal Audit Service. The current Internal Control Framework of the EBA is designed to provide reasonable assurance regarding the achievement of five objectives set out in Article 30(2) of the Financial Regulation: (1) effectiveness, efficiency and economy of operations; (2) reliability of reporting; (3) safeguarding of assets and information; (4) prevention, detection, correction and follow-up of fraud and irregularities; and (5) adequate management of risks relating to the legality and regularity of the underlying transactions. The revised framework supplements the Financial Regulation and other applicable rules and regulations with a view to aligning EBA standards to the Commission standards, which are based on the highest international standards set by the Committee of Sponsoring Organisations of the Treadway Commission (COSO) framework.
- The discharge granted by the European Parliament and the related report further supports management assurance, in that the observations issued by the Discharge Authority in the last reports did not raise any substantial issues. Where concerns were noted, these had already been resolved to the extent that they were generally raised in the context of evaluations of the Court or IAS, and could thus be addressed as part of the follow-up actions taken in response to these.
- There were no significant weaknesses reported from these building blocks of assurance that are considered to be of such a significance that they would have an impact on the Executive Director's Declaration of Assurance.

4.2 Reservations

Materiality criteria used regarding reservations:

The concept of materiality provides the Authorising Officer with a basis for determining if an identified weakness should be subject to a formal reservation in the declaration of assurance.

Qualitative criteria:

- Weakness leading to critical operational damage.
- Weakness leading to critical reputational damage.
- Critical observations by auditors or OLAF.

Quantitative criteria:

In accordance with the Commission's guidelines on the preparation of annual activity reports, the ECA uses a 2% materiality threshold. The EBA has therefore set the quantitative criterion for materiality at 2% of its total budget

Overall conclusions on assurance

Taking into account the review of the elements supporting assurance, the Executive Director, in their role as Authorising Officer, is of the opinion that the management and control systems at the EBA are functioning as intended. Risks are appropriately monitored and mitigated, and necessary improvements are being implemented.

Based on the information presented in the report, and in light of the opinions expressed by the ECA regarding the reliability of the accounts, as well as the legality and regularity of the transactions underlying those accounts, the EBA concludes that the existing systems provide reasonable assurance that the resources under the Executive Director's responsibility have been used for their intended purposes and in accordance with the principles of sound financial management.

Part V – Declaration of assurance

I, the undersigned, François-Louis Michaud, Executive Director of the European Banking Authority, in my capacity as Authorising Officer, declare that the information contained in this report gives a true and fair view.

I hereby state that I have reasonable assurance that the resources assigned to the activities described in this report have been used for their intended purpose and in accordance with the principle of sound financial management, and that the control procedures put in place give the necessary guarantees concerning the legality and regularity of the underlying transactions.

This reasonable assurance is based on my own judgement and on the information at my disposal such as the results of the self-assessment, *ex ante* verifications and *ex post* controls performed during the year, or the reports of the Internal Audit Service and of the European Court of Auditors.

I confirm that I am not aware of anything not reported which could harm the interests of the European Banking Authority.

Paris, 30 June 2025

François-Louis Michaud
Executive Director of the European Banking Authority

Annexes

Annex I – Core business statistics

Priority: Implementing the Basel framework in the EU and enhancing the Single Rulebook (see also 1.1.1.)

KPI

	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 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 Commission's renewed Sustainable Finance Strategy delivered on time. Source: Annual activity report?	80%	100%

Source of information for KPI A, KPI B: EBA work programme monitoring tool and publications

Regarding KPI A, the EBA delivered 30 technical standards, guidelines and reports compared to 41 indicated as planned in the 2024 WP. Some mandates were postponed, delayed for the reasons – often outside of the EBA's control – indicated in the output tables for activities 1 to 6 and 11 in Section 1.5. In addition to this, the EBA completed 11 additional deliverables of the above kind, which had not been included in the 2024 WP, thus bringing the achievement rate to 81%.

Regarding KPI B, the EBA completed all four mandates as planned in the 2024 WP. Some mandates were slightly delayed for reasons indicated in the output table for activity 7 in Section 1.4.

Priority: Monitoring financial stability and sustainability in a context of increased interest rates and uncertainty (se also 1.1.2.)

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-2024 3. Implementation of the revised EU-wide stress test framework for the 2025 exercise	70%	100%
B	Development and execution of one-off and regular	50%	1. Development of one-off climate stress test and regular climate stress test	70%	100%

	Indicator	Weight	Short description	Target	Achievement
	climate stress test (Output)		2. Implementation of one-off climate stress test 3. Implementation of regular climate stress test		

Source of information for KPI A, KPI B: EBA work programme monitoring tool and publications

Regarding KPI A, all the milestones were fully achieved: Approval of the revised EU-wide stress test framework was completed by Q2 and then consulted with the industry; the design of the new ST methodology, and implementation of the revised EU-wide stress test framework for the 2025 exercise, was finalised with the publication of the package in Q4.

For KPI B, all the milestones were equally achieved in full: Development of one-off climate stress test was completed in 2023, while the implementation of the one-off climate stress test was completed in early Q3. The development of the regular climate stress test continues in accordance with the planning and will be followed by its implementation as part of the 2027 EBA stress test.

Priority: Providing a data infrastructure at the service of stakeholders (see also 1.1.3.)

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 (nr 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 webpage of RDB	< 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 for KPI A to D: EUCLID

Regarding the newly introduced KPIs, the following should be noted.

KPI A. The targeted timeliness rate of reporting of > 95% has been exceeded.

KPI B: The targeted completeness rate of reporting of < 0.1% has been met.

KPI C: The targeted accuracy rate of reporting of < 0.1% has been met.

KPI D: The target time for the publication of the Quarterly Risk Dashboard stands at 19 days and is lower than the initially foreseen target of 30 days. However, as this internal target has been lowered as of the Q1 2024 reference date to < 15 days, additional efforts will be made to achieve this going forward.

Priority: Developing an oversight and supervisory capacity for DORA and MiCA (see also 1.1.4.)

KPIs

	Indicator	Weight	Short description	Target	Achievement
A	Delivery of policy mandates under DORA/MiCA (Output)	30%	Delivery of policy mandates and Consultation Papers within the legally imposed 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 for KPI A: EBA work programme monitoring tool and publications; KPI C: DORA/MiCA milestones tracker.

Regarding KPI A, the EBA delivered all the technical standards, guidelines mandated under DORA (13 technical standards and guidelines) and MiCA 20 technical standards and guidelines) as planned in the 2024 WP. See also the output tables for activity 8 in Section 1.5.

As concerns KPI B, it is noted that:

- DORA oversight preparations progressed as planned. The ESAs finalised the internal operating model (Joint Oversight Venture) and the oversight governance (Oversight Forum Mandate and Joint Oversight Network Protocol) by the end of 2024. The ESAs also advanced significantly with the preparations for the CTPP designation, the various methodologies and procedures, and the implementation of IT tools in support of the oversight activities.
- MiCA supervision preparations progressed as planned to be able to take supervisory tasks as needed in a timely manner, including supervisory methodologies and tools for risk assessment, cooperation arrangements with CA, on-site/off-site supervisory methodologies, establishment of supervisory colleges and preparation of significance assessment.

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

KPIs

	Indicator	Weight	Short description	Target	Achievement
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 Regulation (MiCA), and the Credit Servicers and Credit Purchasers Directive (CSD) and the EBA regulation	75%	100%
B	Effective retail conduct supervision to	10%	The EBA will take action in response to information provided through retail risk	1 initiative	1 initiative

	Indicator	Weight	Short description	Target	Achievement
	enhance protection of consumers (Result / Impact)		indicators and the EBA's Consumer Trend Reports 2022/2023		
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 report issued to 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 3 initiatives 100% reviewed materials for SDFA	i) and ii) 4 initiatives including workshops iii) Fully achieved
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 forward.	2 reports	Fully achieved: 2 reports

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

Regarding the KPIs, the following should be noted:

KPI A: The EBA delivered all mandates planned in the 2024 work programme as set out in the table for activity 9 in Section 1.5. In addition to this, the EBA completed two additional deliverables, which had not been included in the 2024 WP.

KBI B: The EBA took action in response to information provided through retail risk indicators and the EBA's Consumer Trend Reports 2022/2023 and undertook a fact-finding exercise which led to the publication of a report on the creditworthiness assessment practices of non-bank lenders.

KPI C: The EBA undertook four initiatives in relation to sub-indicators i) and ii), which led to the following output: a factsheet on DeFi in Q2 2024; a special feature on AI/GPAI in the autumn RAR in Q4 2024; the report on tokenised deposits in Q4 2024; and the report (joint EBA-ESMA) on recent developments in crypto-asset markets (DeFi, lending and staking) delivered in Q4 and published in Q1 2025 (which was accompanied by two factsheets). For sub-indicator iii), the target was fully achieved.

KPI D: The EBA prepared several reports in the broader context of the transition work, including in preparation for the response to the call for advice that the European Commission issued in March 2024. Furthermore, two reports prepared by the EBA are linked to the preparation of the transition and support the effective implementation of the new legal and institutional AML/CFT framework: report on the assessment of CAs' approaches to the AML/CFT supervision of banks; report on AML/CFT colleges.

Annex II – Statistics on financial management

Finance, Procurement, and Accounting Key indicators

	Indicator		Year-end Target	2024 year-end	2023 year-end
1	Voted budget committed	%	> 95%	99.9%	98.1%
2	Carried forward paid	%	> 95%	97.8%	98.9%
3	Late paid invoices	%	1.0%	0.8%	0.0%
4	Late interest paid	EUR	0	0	607
5	Procurement plan execution	%	> 95%	95%	n/a
6	Payments correctly posted	%	> 98%	99.8%	100.0%
7	Recovery orders correctly posted	%	> 98%	100%	100%

Notes:

1. Budget execution: euro amount committed as a percentage of the 2024 budget, including amendments, voted on by the Board of Supervisors. Target set by the Commission's DG BUDG.
2. Execution of commitments carried forward: euro amount paid as a percentage of commitments carried forward from 2023. Target set by the Commission's DG BUDG.
3. Late paid invoices: number of invoices paid by the EBA after the payment deadline, as a percentage of all invoices paid in the year to date. With the expected volume of invoices in 2024, 1% represents less than 10 invoices.
4. Late interest paid: amount of interest paid by the EBA on invoices paid late. Amounts calculated automatically. The EBA is obliged to pay i) all amounts greater than EUR 200, ii) amounts below EUR 200, if claimed.
5. Procurement plan execution: rate of execution of the 2024 plan – see Annex D for the amended SPD 2025 plan with procedures to be started in 2025 and ongoing at the end of 2024 and a description of the calculation basis.
6. Payments correctly posted: correct general ledger account is used for approved payment.
7. Recovery orders correctly posted: correct general ledger account is used for approving the recovery order.

Revenue

The EBA Founding Regulations stipulate that the Authority's revenues shall consist, in particular, of:

- obligatory contributions from national public authorities competent for the supervision of financial institutions;

- a subsidy from the European Union;
- any fees paid to the Authority in the cases specified in the relevant instruments of Union law.

Furthermore, Article 20 of the Financial Regulation enables the EBA to collect other external and internal assigned revenue used to finance specific items of expenditure.

Comparison of revenues received in 2024 vs 2023

Revenues	2024 *A*	2023 *B*	2024 vs 2023 EUR *C = A – B*	% *D = C / B*
EU Contribution	**20 857 871**	**19 428 306**	**1 429 565**	**7.4%**
Contributions from NCAs	**35 117 211**	**32 453 924**	**2 663 287**	**8.2%**
- from EU NCAs	34 062 640	31 479 332	2 583 308	8.2%
- from EFTA NCAs	1 054 571	974 592	79 979	8.2%
Contributions from host Member State	**575 000**	**575 000**	**-**	**-**
DG REFORM funding for EU SDFA	**356 119**	**214 772**	**141 347**	**65.8%**
Miscellaneous revenue	**235 115**	**401 041**	**- 165 926**	**-41.4%**
TOTAL REVENUE	**57 141 316**	**53 073 043**	**4 068 273**	**7.7%**

Expenditure

In 2024, the EBA reached a budget execution rate of 99.6% (or EUR 56 895 504) on all revenue received.

Comparison of total appropriations committed at the end of the year in 2024 vs 2023

Title	2024 *A*	2023 *B*	2024 vs 2023 EUR *C = A – B*	% *D = C / B*
I: Staff expenditure	36 539 088	34 084 796	2 454 292	7.2%
II: Administrative expenditure	12 317 507	11 790 977	526 530	4.5%
III: Operational expenditure	8 038 909	5 808 178	2 230 731	38.4%
TOTAL	**56 895 504**	**51 683 951**	**5 211 553**	**10.1%**

Budget execution of 2024 funds by chapter

Title and chapter	Budget appropriations Voted *A*	Assigned *B*	Total *C=A+B*	Total commitments EUR *D*	% *F=D/C*	Total payments EUR *G*	% *H=G/C*
I: Staff expenditure	**36 542 785**	**54 182**	**36 596 967**	**36 539 088**	**99.8 %**	**36 184 857**	**98.9%**
11 Staff in active employment	34 355 790	48 337	34 404 127	34 355 405	99.9 %	34 355 405	99.9%
12 Expenditure relating to staff management and recruitment	324 889		324 889	324 779	100.0 %	324 779	100.0%

Title and chapter	Budget appropriations			Total commitments		Total payments	
	Voted *A*	Assigned *B*	Total *C=A+B*	EUR *D*	% *F=D/C*	EUR *G*	% *H=G/C*
13 Mission expenses, travel and incidental expenses	111 041		111 041	111 035	100.0 %	108 909	98.1%
14 Socio-medical infrastructure	636 171	2 945	639 116	635 969	99.5 %	613 938	96.1%
15 Training	455 928	2 900	458 828	455 832	99.3 %	262 240	57.2%
17 Representation expenses, receptions and events	518 966		518 966	518 905	100.0 %	396 375	76.4%
II: Administrative expenditure	140 000		140 000	137 163	98.0 %	123 211	88.0%
20 Building rental of and associated costs	**12 278 809**	**162 108**	**12 440 917**	**12 317 507**	**99.0 %**	**10 948 590**	**88.0%**
21 Information and communication technology	4 957 194		4 957 194	4 955 855	100.0 %	4 758 492	96.0%
23 Current administrative expenditure	6 478 640	108 513	6 587 153	6 519 418	99.0 %	5 547 374	84.2%
24 Postage and telecommunications	511 471	53 595	565 066	510 815	90.4 %	362 939	64.2 %
25 Information and publishing	331 504		331 504	331 419	100.0 %	279 785	84.4%
III: Operational expenditure	**8 084 607**	**18 826**	**8 103 433**	**8 038 909**	**99.2 %**	**5 848 171**	**72.2%**
31 General operational expenditure	2 148 978	1 406	2 150 384	2 106 622	98.0 %	1 764 534	82.1%
32 IT expenses for operational purposes	5 935 629	17 419	5 953 048	5 932 287	99.7 %	4 083 637	68.6%
Total	**56 906 201**	**235 115**	**57 141 316**	**56 895 504**	**99.6 %**	**52 981 618**	**92.7%**

Budget outturn for 2022–2024

	2022	2023	2024
Reserve from the previous years' surplus (+)	467 881	605 145	207 903
Revenue actually received (+)	50 628 924	52 468 356	56 933 412
Payments made (-)	-43 982 571	-48 857 367	-4 083 657
Carry-over of appropriations (-)	-7 059 468	-3 945 729	-2 617 975
Cancellation of appropriations carried over (+)	124 390	71 989	79 877
Adjustment for carry-over of assigned revenue appropriations from previous year (+)	166 169	737 110	383 753
Exchange rate differences (+/-)	-2 982	1 379	-30
Adjustment for negative balance from previous year (-)	-	-	-
Total surplus	**342 343**	**1 080 883**	**140 537**

Budget transfers

In 2024, the EBA processed 32 budget transfers, of which nine included transfers between titles. All of the transfers between titles were below the 10% threshold that would have required MB approval.

Budget transfer statistics

Year	No of transfers			Comments
	Within the same title	Between titles	Total	
2024	23	9	32	All transfers between titles were below the 10% threshold
2023	21	6	27	All transfers between titles were below the 10% threshold
2022	16	7	23	All transfers between titles were below the 10% threshold

A summary per chapters of the budget amendments and transfers made in 2024 is available in the table below.

Budget amendments and transfers per chapter

Title and chapter	Voted budget *A*	Amendments *B*	Transfers *C*	Final budget *D = A + B + C*
Title 1 Staff expenditure	**36 859 935**	**273 127**	**- 590 277**	**36 542 785**
11 Staff in active employment	31 924 700	211 355	- 642 036	31 494 019
11.33 Employer's pension contributions	2 800 000	61 772	-	2 861 772
12 Expenditure relating to staff management and recruitment	279 290	-	45 599	324 889
13 Mission expenses, travel and incidental expenses	87 240	-	23 800	111 040
14 Socio-medical infrastructure	844 111	-	- 207 940	636 171
15 Training	474 528	-	- 18 600	455 928
16 External services	341 866	-	177 100	518 966
17 Representation expenses, receptions and events	108 200	-	31 800	140 000
Title 2 Administrative expenditure	**10 788 623**	**-**	**1 490 186**	**12 278 809**
20 Building rental and associated costs	4 775 177	-	182 017	4 957 194
21 Information and communication technology	5 007 371	-	1 471 269	6 478 640
23 Current administrative expenditure	594 371	-	- 82 900	511 471
25 Information and publishing	411 704	-	- 80 200	331 504
Title 3 Operational expenditure	**8 984 516**	**-**	**- 899 909**	**8 084 607**
31 General operational expenditure	2 491 887	-	- 342 909	2 148 978
32 IT expenses for operational purposes	6 492 629	-	- 557 000	5 935 629
Total	**56 633 074**	**273 127**	**-**	**56 906 201**

Chairperson and Executive Director expenses

Mission, representation and other expenses in accordance with Articles 11 to 15 of Annex VII to the Staff Regulations amounted to EUR 7 294 for the Chairperson and EUR 5 782 for the Executive Director.

Transaction processing

The tables below show the volume and value of commitments and payments processed in 2024 compared to 2023, irrespective of the source of funding. This includes any commitments (decommitments) and payments related to budget appropriations carried over from previous year (C5 and C8).

Commitments (including all fund sources, top-ups and decommitments)

Commitments	2024	2023	Movement	%
Volume	798	827	-29	-4%
EUR	57 199 629	52 342 306	4 857 323	9%
Average value	71 679	63 292	8 387	13%

Payments (on all fund sources, including carry forward)

Payment orders	2024	2023	Movement	%
Volume	1 095	1 068	27	3%
EUR	56 450 336	54 370 627	2 079 709	4%
Average value	51 553	50 909	644	1%

The figures above include batch payments (referred to as mass payment load (MPL). The EBA uses MPL for payments to:

o staff: for salaries and allowances, for mission reimbursements, and for contributions, including the home office contribution and public transport contribution;

o SNE and trainees: for monthly allowances and travel allowances.

The table below provides more data on these batch payments. They have contributed to a significant workload increase, as the supporting documentation for each of the individual payments contained within an MPL is subject to *ex ante* control.

Payments by mass payment load (MPL) excluding staff salaries and SNE/trainee allowances

	2024	2023	Movement	%
Number of MPL	74	51	23	45%
Total number of individual payments	779	609	170	28%
Total value	292 856	194 443	98 413	51%

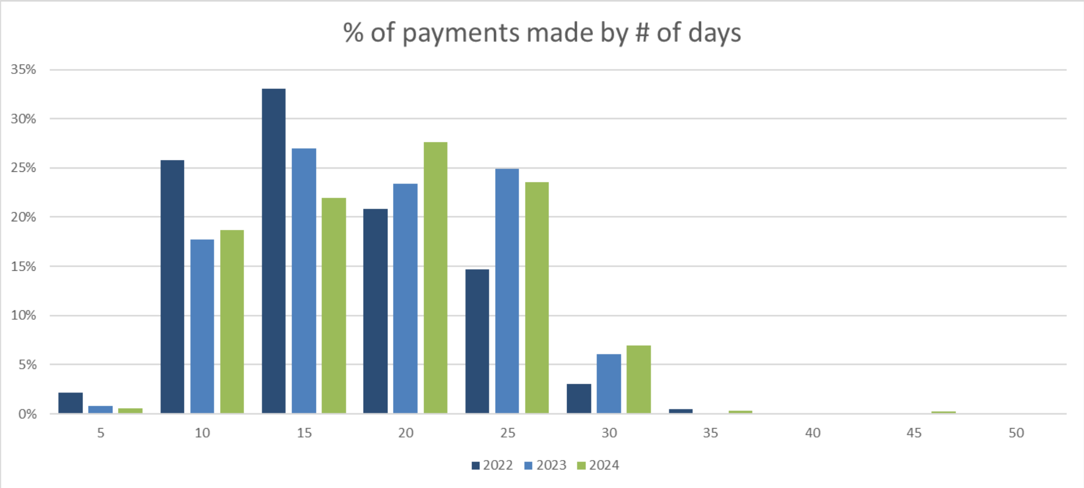
Recovery orders

Recovery orders	2024	2023	Movement	%
Volume	116	123	-7	-6%
EUR	58 620 711	54 752 170	3 868.541	7%
Average value	505 351	445 140	60 211	14%

Supplier invoices – payment timing

The figure below compares payment timing in 2024 with previous years, by blocks of five days. In 2024, 19% of payment requests were paid within 10 days and 22% of payment requests paid in the period 10-15 days after receipt.

Payment timing statistics 2022-2024



In 2024, the EBA paid seven invoices after the due date, of which six where invoices registered at the end of 2023 and which due to technical reasons were not paid on time. No late payment interest was charged in respect to these invoices.

Invoice processing statistics

	2024	2023	2022
Total number of invoices paid	862	869	802
Late registration (> 7 days)	4	16	3
Invoices paid after the deadline (nr.)	7	2	5
Invoices paid after the deadline (%)	0.8%	0.0%	0.6%
Average time-to-pay (days)	17	13	15
Number of suspended invoices	130	99	87
Average payment suspension (days)	61	26	42

When the EBA receives an invoice that is incorrect, not in accordance with the underlying contract, or where clarification is required, the EBA has the option of 'suspending' it in the accounting system (ABAC). This pauses the payment time clock, so that the suspended invoice does not go past its due date while the issue is being resolved. Finance keeps a measure of this because such invoices drive an increase in workload for staff, who have to spend time trying to resolve the issue. The increase in 2024 is driven by one supplier in particular, where 25 low value invoices have been suspended.

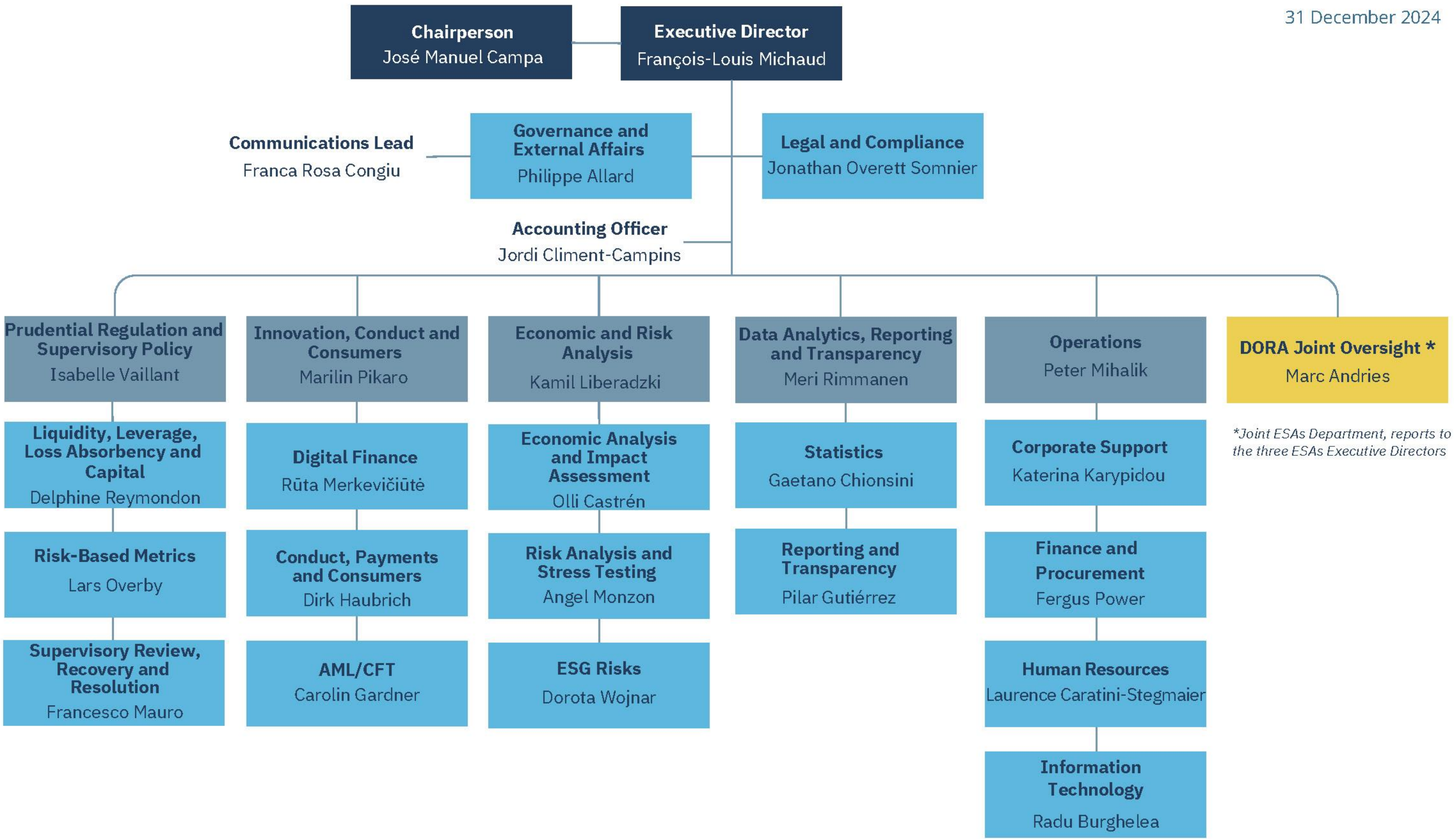
Legality and regularity indicators (linked to paragraph 2.3.3 of the report)

Indicators	2022	2023	2024
Procurement			
Number of planned procedures cancelled	1	1	3
Average number of requests for clarification regarding tender specifications, for procedures > EUR 15 000	20	10	11
Number of procedures > EUR 15 000 where one or no offers were received	2	2	1
Average number of offers received on open/restricted procedures	3.0	6.1[10]	3.5
Number of 'valid' complaints or of litigation cases filed	Zero	Zero	Zero
Financial transactions			
Number of transactions 'refused for correction':			
Commitments	12.0%	14.4%	12.5%
Payments	7.4%	15.5 %	16.6%
Recovery orders	12.3%	8.8%	9.6%
Transactions correctly posted in general ledger:			
Payments	99.7%	100.0%	99.8%
Recovery orders	100.0%	100.0%	100.0%

Late in 2024, the EBA began the process of updating its financial system to enable better reporting of reasons for 'refusal' of transactions.

[10] 23 offers were received for one procedure with two lots.

Annex III – Organisational chart (31 December 2024)



Annex IV – Establishment plan and additional information on human resources management

Establishment plan 2024

Function group and grade	2024 Year N-1			
	Authorised budget		Actually filled as of 31.12.2024	
	Permanent posts	Temporary posts	Permanent posts	Temporary posts
AD16		1		1
AD15		1		0
AD14		5		3
AD13		2		0
AD12		8		10
AD11		12		7
AD10		13		17
AD9		25		24
AD8		28		27
AD7		32		31
AD6		21		15
AD5		29		16
AD TOTAL	-	**177**	-	**151**
AST11				
AST10				
AST9				
AST8				
AST7				
AST6		3		1
AST5		4		2
AST4		3		3
AST3		1		3
AST2		1		2
AST1		0		0
AST TOTAL	-	**12**	-	**11**
AST/SC TOTAL				
TOTAL	-	**189**	**-**	**162**

Information on recruitment grade / function group for type of post

Key functions	Type of contract	Function group, grade of recruitment
Chairperson, Management Board	TA2(a)	AD 15
Executive Director	TA2(a)	AD14
Director of Department	TA2(f)	AD12
Head of Unit	TA2(f)	AD 9
Head of Sector	n/a	n/a
Senior Officer, Senior Specialist, etc.	TA2(f)	AD 8
Officer, Specialist	TA2(f)/CA	AD 6-7 – CA FG IV
Junior Officer	TA2(f)	AD 5
Senior Assistant	TA2(f)/CA	AST4- CA FG III
Junior Assistant	n/a	
Secretary to Chair, ED, Director	CA	FG IV
Secretary	CA	FG III
Mail Clerk	n/a	
Data Protection Officer	TA	AD 6
Accounting Officer	TA	AD 6
Internal Auditor	n/a	

Job screening/benchmarking

Job Type (sub)category	2022	2023	2024
Administrative support and Coordination	**12.3%**	**11.6%**	**12.1%**
Administrative support	9.0%	8.7%	8.8%
Coordination	3.3%	2.9%	3.3%
Operational	**82.5%**	**84.6%**	**83.7%**
Top level Operational Coordination	4.4%	4.8%	4.6%
Programme Management and Implementation	32.4%	34.5%	31.3%
Evaluation& Imapct assessment	12.9%	12.4%	14.3%
General operational	32.8%	33.0%	33.6%
Neutral	**5.2%**	**3.8%**	**4.2%**
Finance/Control	5.2%	3.8%	4.2%
Linguistics	0.0%	0.0%	0.0%

New Implementing rules in compliance with Article 110 of the Staff Regulations adopted in 2024:

Transfer of pension rights	Commission Decision C(2024) 1038
Conduct of administrative inquiries and disciplinary proceedings	Commission Decision C(2019) 4 231

Schooling

The EBA considers schooling to be an essential part of its staff policy. For this purpose, the ‘European School la Défense’ has been granted accreditation for all levels from ‘Maternelle’ to the European Baccalaureate. A full nursery, primary and secondary education cycle is available for the English section, while, in addition to a full nursery and primary cycle, a secondary cycle is gradually opening for the French section. Hence, the EBA is exceptionally maintaining its education contribution policy for certain staff members under certain conditions (e.g. if the child is in the final two years of the secondary cycle or where the child attends a significant part of their school activities (equal to or more than 70%) in a language other than those offered by the European School in Paris.

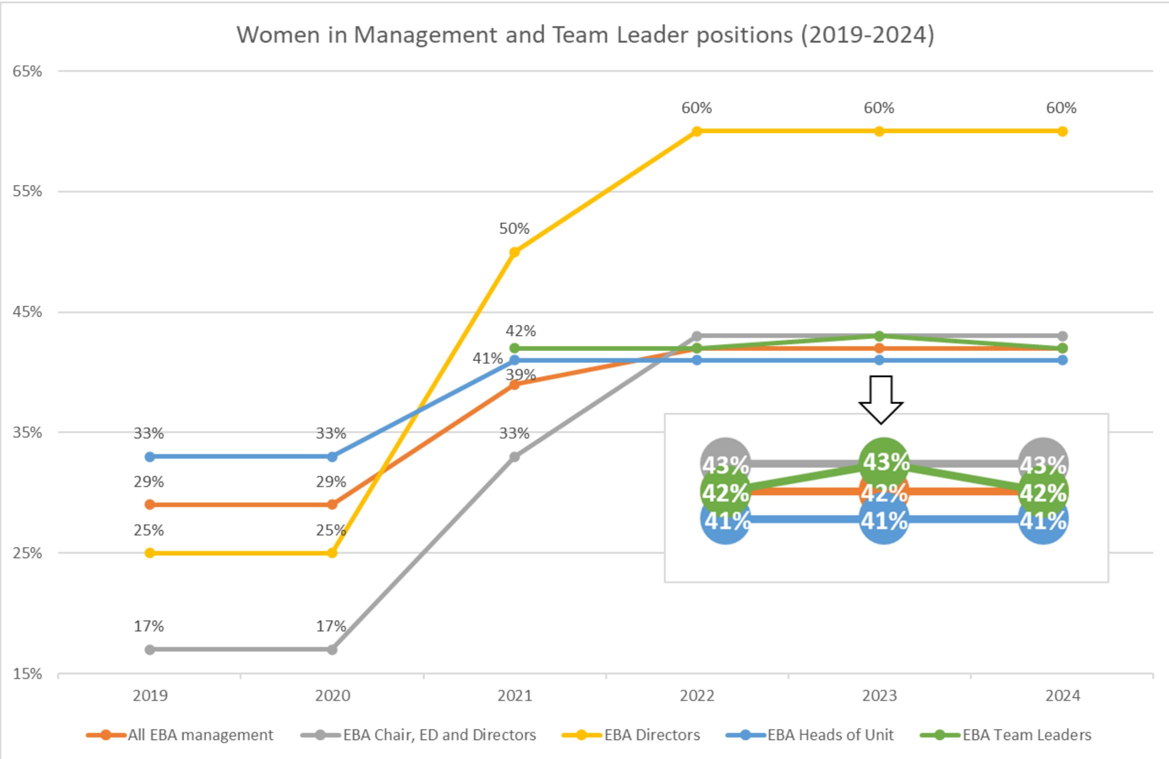
The EBA continues to work on direct agreements with schools and nurseries in Paris. On the basis of these agreements, the EBA pays tuition fees up to the threshold directly to the nurseries/schools. Amounts exceeding the threshold will be borne by staff members.

School year 2024–2025

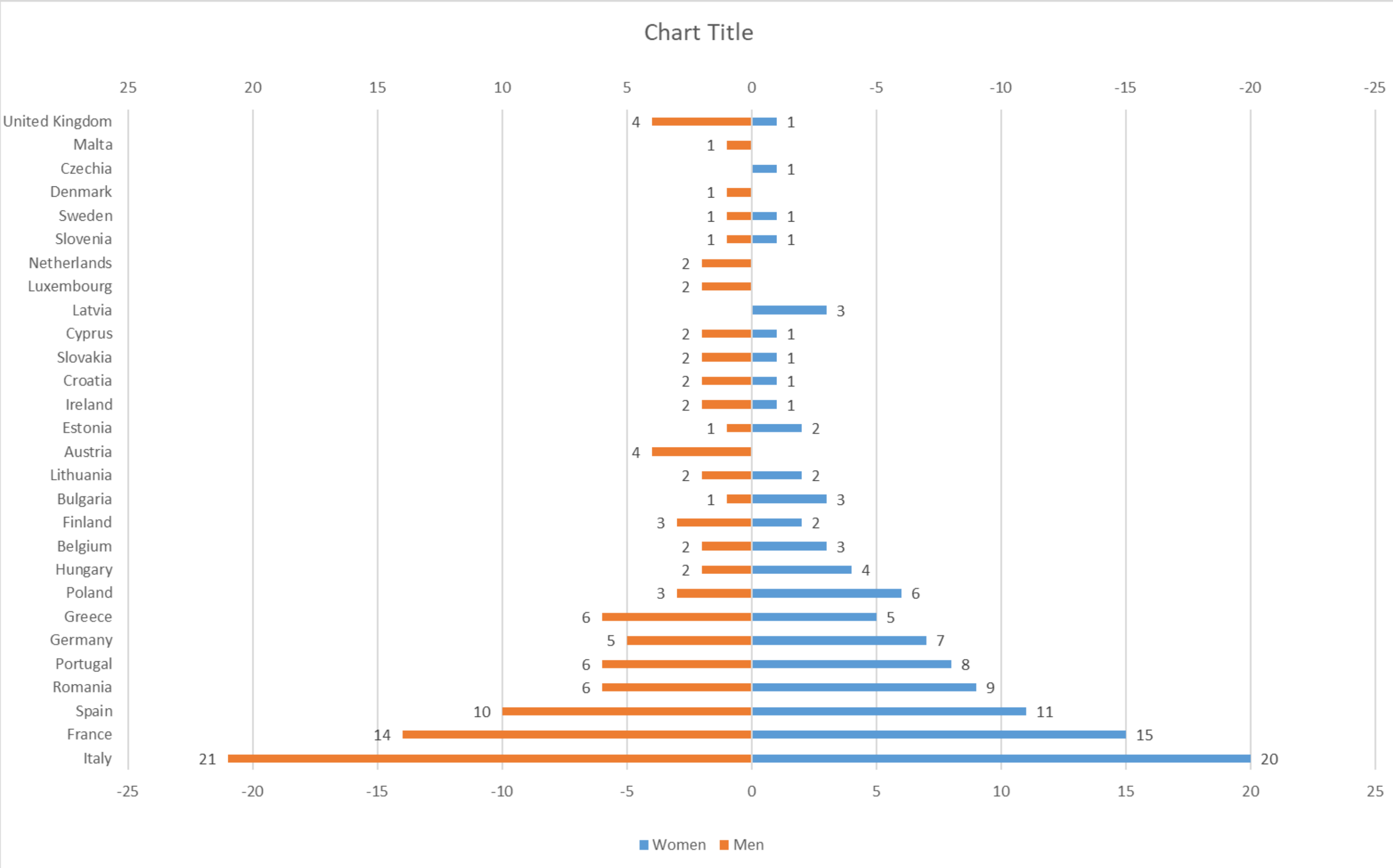
The number of EBA staff members' children enrolled at the 'European School la Défense' for the 2024/2025 year is 6 in nursery, 17 in primary and 10 in secondary.

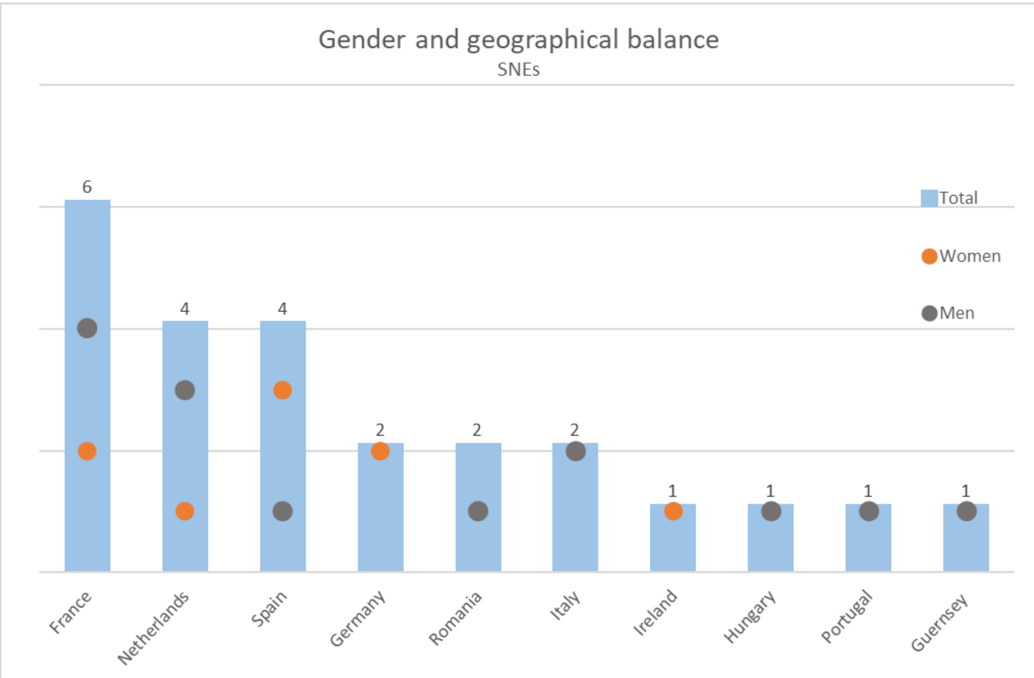
The EBA has agreements with a further 10 schools (six eligible applications) and 22 nurseries (21 applications) for direct payment of costs.

Women in management and team leader positions from 2019 to 2024



Statutory staff (TAs/CAs) and SNEs: gender and geographical balance





Annex V – Human and financial resources by activity

The table below summarises the resource allocation per activity and details the type of resource: TA, CA or SNE. Management staff and their assistants are distributed over the activities within their respective remits, hence the staffing numbers per activity are not whole numbers. (Minor differences in totals are due to rounding.)

				2024		
	Activity (preceded by the priority they contribute to)	**TA**	**CA**	**SNE**	**Total**	**Cost (EUR)**
	Policy and convergence work	**73.7**	**15.6**	**9.0**	**98.3**	**23 006.982**
P1	1 - Capital, loss absorbency, and accounting	7.4	0.2	-	7.6	1 843.310
P1	2 - Liquidity, leverage, and interest rate risk	2.6	0.1	-	2.7	797 756
P1	3 - Credit risk (incl. large exposures, loan origination, NPL, securitisation)	7.2	1.8	2.0	11.0	2 450.795
P1	4 - Market, investment firms and services, and operational risk	9.3	0.7	1.0	11.0	2 205.598
P1	5 - Market access, governance, supervisory review and convergence	8.6	0.2	0.8	9.6	2 010.253
P1	6 - Recovery and resolution	4.1	0.1	-	4.2	957 994
P1,2	7 - ESG in supervision and regulation	6.4	2.1	1.0	9.5	1 807.641
P4,5	8 - Innovation monitoring, knowledge-sharing, MiCA supervision …*	16.7	5.7	1.2	23.6	6 791.570
P5	9 - Payment services, consumer and depositor protection.	4.6	1.4	3.0	9.0	1 660.838
P5	10 - Anti-money laundering and countering the financing of terrorism	6.8	3.3	-	10.1	2 481.227
	Risk assessment and data	**35.7**	**16.6**	**4.0**	**56.3**	**15 814.004**
P1,3	11 - Reporting and transparency framework	9.9	1.0	1.0	11.9	2 588.414
P2	12 - Risk analysis	5.4	-	1.0	6.4	1 368.860
P2	13 - Stress testing	5.1	-	1.0	6.1	1 431.684
All	14 - Regulatory impact assessments	8.1	2.1	1.0	11.2	2 376.306
P3,4	15 - Data infrastructure and services, statistical tools	7.2	13.5	-	20.7	8 048.740
	Coordination and support	**55.6**	**20.8**	**6.0**	**82.4**	**18 085.215**
ALL	16 - EBA governance, international affairs, communication	5.1	8.3	3.0	16.4	2 777.113
ALL	17 - Legal and compliance	13.2	1.0	2.0	16.2	3 836.182
ALL	18 - Resources (HR and finance)	14.6	5.6	-	20.2	4 461.728
ALL	19 - Infrastructure (Information technology and corporate support)	22.7	5.9	1.0	29.6	7 010.192
	Sub-total	**165.0**	**53.0**	**19.0**	**237.0**	**56 906.201**
	Oversight and supervision activities	**24.0**	**-**	**-**	**24.0**	**-**
	DORA oversight	6.0	-	-	6.0	-
	MiCA supervision	18.0	-	-	18.0	-
	EMIR validation of certain IMM	-	-	-	-	
	Total	**189.0**	**53.0**	**19.0**	**261.0**	**56 906.201**

* Activity 8 – Innovation monitoring and knowledge-sharing, MiCA supervision and supervisory convergence, ICT policy and operational resilience. It covers MiCA and DORA preparations (in 2024 and in part 2025 mostly through internal

resource redeployments), posts foreseen for the EU Supervisory Digital Finance Academy (including one CA post funded by DG REFORM), as well as 4 EU-funded posts (for MiCA) foreseen in the Union budget.

In relation to the oversight and supervision activities, the following is noted:

- For DORA oversight, the situation is as follows: In 2024, two of the five fee-funded TA posts should be filled, using the bridge funding provided in the EU budget. (A sixth DORA post is funded through the EU budget until end of Q3 2025 and has been filled in 2024.) In 2025, all eight allocated fee-funded TA posts should be filled by year end. The two fee-funded CA posts should be filled in 2026.
- For MiCA supervision, the situation is as follows: The allocated EU-funded posts (2 TA and 2 CA posts) were filled in 2024 and are allocated to activity 8. From 2026, three of the 20 fee-funded TA posts should be filled.
- For validation of certain initial margin models under EMIR, the fee-funded TA and SNE posts should be filled from mid-2026.
- The costs related to oversight and supervisory activities do not include the administrative overheads.

Annex VI – Contribution, grant and service level agreements; Financial Framework Partnership Agreements

In 2022, the EBA signed an SLA with DG REFORM whereby the EBA provides services to the EU Supervisory Digital Finance Academy (https://eusdfa.eui.eu) over a period of four years. Under the terms of this SLA, DG REFORM is funding one TA and one CA for three years, as well as other costs arising from the EBA's support to the EU SDFA.

	General information						**Financial and HR impact**			
	Date of signature	Total amount	Duration	Counterpart	Short description		2023		2024	
Service-level agreements										
1. SLA with DG REFORM	14/09/2022	€1 079 515	4 years	DG REFORM	Supporting the EU Supervisory Digital Finance Academy (EU SDFA)		CA	PA	CA	PA
						Amount	214 772	214 772	356 119	356 119
						Number of TAs	0.49		1.30	
						Number of CAs	0.34		0.46	
Total service-level agreements							CA	PA	CA	PA
						Amount	214 772	214 772	356 119	356 119
						Number of TAs	0.49		1.30	
						Number of CAs	0.34		0.46	
TOTAL							**CA**	**PA**	**CA**	**PA**
						Amount	**214 772**	**214 772**	**356 119**	**356 119**
						Number of TAs	**0.49**		**1.30**	
						Number of CAs	**0.34**		**0.46**	

Annex VII – Environmental management

In 2024, the EBA maintained its EMAS registration. The 2024 environmental statement (with data from 2023) was positively verified and validated by independent external auditors and is now available on the EBA website: https://www.eba.europa.eu/about-us/sustainable-eba.

Communication, stakeholders' engagement and promotion of EMAS

The EBA continued to actively promote EMAS, environmental management and sustainability within the EU Agencies Network.

- On 19 January 2024 the EBA and the European Union Drugs Agency organised an information-sharing session about the development of EMAS in-house training. The agencies shared examples of training modules and e-learning courses as well as steps for their practical implementation.
- The EBA was invited by the Community Plant Variety Office (CPVO), a European agency in Angers, France, to deliver a presentation on 29 January 2024 about its EMAS journey as well as greening activities and best practices we put in place in the Agency. Organised in collaboration with the CPVO's management, staff and the greening network, the event highlighted the benefits of implementing EMAS and was a testament to the significance of collaboration among European Union agencies.
- The EBA co-drafted the 'EU Agencies Network Charter on the reduction of greenhouse gas emissions and responsible environmental management' approved by Heads of European Agencies in February 2024.
- Between February and April 2024, the EBA participated in an inter-agency twinning programme on sustainability reporting, a joint initiative of the Performance Development Network and Greening Network of the EU Agencies Network.
- The EBA, together with the ESMA and EIOPA, participated for the second time in Interinstitutional EMAS Days. The ESAs' presentation 'Sustainable finance: tools for mitigating climate-related risks', on 5 November 2024, ranked in the top three most frequented sessions of this annual event for EMAS-registered organisations.
- On 22 November 2024, the EBA shared its best practices with its presentation 'Beyond the Walls: Designing Our Workplace for a Sustainable Future'.

In addition to the dedicated webpage Sustainable EBA, the EMAS logo is now also visible on the main EBA website. Moreover, the EBA continues to refer to EMAS in all its vacancy notices, procurement procedures and orientation packs welcome back for new joiners (e.g. staff, trainees, interns).

Environmental objectives and targets

Significant aspects	2024 objectives	Main actions implemented by the EBA in 2024 to improve its environmental performance and reduce its carbon footprint
Travel	The reduced levels of business travel are maintained The reduced number of meetings are maintained EBA visitors and staff are informed about sustainable ways of travel Green transport options for home-office commuting have been increased and promoted	In its Environmental Policy, the EBA committed to minimising its impact on greenhouse gas emissions, with a special focus on travel. In 2024, the EBA maintained its reduced levels of business travel and on-site meetings. The EBA continued to raise awareness about sustainable ways of travel. In particular, the EBA updated its handbook for visitors, where it invites its guests to contribute to a greener EBA. The objective of increasing green transport for staff home-office commuting, initially foreseen only for 2024, was postponed and expanded as a strategic objective for a three-year period of 2025–2027. The EBA continued to actively promote green options for commuting in its discussions with the building and with Paris La Défense authorities. In 2024, the EBA maintained its contribution to public transport for its employees.
Energy	Energy consumption in the building is reduced by 5% (baseline 2023)	In its Environmental Policy, the EBA committed to building a strong relationship with its landlord to improve energy consumption performance. The EBA finalised a technical report on energy efficiency, with the aim of identifying further energy saving measures in the functioning of the EBA premises in view of European targets on greenhouse gas reductions. In 2024, the EBA managed to achieve its reduction target on energy consumption.
IT	Sustainable policies for the reduction of the environmental impact of IT&C equipment have been implemented (recycling, reusing, multi-purposing)	In its Environmental Policy, the EBA committed to maximising the use of electronic solutions to limit our material impact and to improve energy consumption performance. In 2024, the EBA continued to implement comprehensive policies to optimise the usage of IT&C equipment, focusing on sustainability and efficiency. MS Teams rooms video conferencing devices were reprogrammed to shut down at night and over

		weekends. Additionally, all group black-and-white printers were removed from the print rooms. Moreover, cost-effective measures for the EBA Azure Virtual Desktop were implemented by forcing the power-off of virtual machines during periods of inactivity and shutting them down during night hours and weekends. By adopting advanced monitoring tools, full visibility into our Azure resource consumption was ensured, allowing ITC to maintain business processes and business continuity. Finally, regular reviews of our dashboards helped us track our progress and continuously improve our environmental footprint.
Procurement	Environmental impact is considered for 100% of contracts procured by the EBA Contract managers are trained on green public criteria	In its Environmental Policy, the EBA committed to maximising the use of green public procurement to limit its material impact. This means that the EBA strives to minimise the environmental impacts of its procurement activity and of the services, supplies and works it procures. The EBA assesses whether its purchases have an environmental impact and, if they do, the EBA specifies green procurement criteria in its procurement procedures and chooses sustainable services and supplies. Since 2022, the EBA has been evaluating the environmental impact of 100% of procurement procedures and including green procurement criteria in all the procurement procedures that had an environmental impact. To increase the understanding of sustainable procurement and green criteria among the key EBA staff involved in the procurement and purchasing activity, the EBA invested in the training of its personnel. Since 2020, the EBA's teams – both procurement officers and contract managers – have been attending dedicated learning and information sessions, provided by EU institutions and external experts.
Waste	All furniture and IT equipment is decommissioned in a sustainable manner (donation, disposal)	In its Environmental Policy, the EBA committed to improving its waste production, segregation and recycling, as expected by the EBA's staff. To contribute to this objective, in 2023, the EBA adopted a circular economy policy, where it commits to: a) minimise purchases of physical items so as to limit our material impact, b) buy to keep, c) maximise the lifecycle of products, d) minimise the generation

		of waste, e) dispose of items in an environmentally friendly manner and f) introduce and promote environmental best practices. Within the framework of the EBA's circular economy policy, in 2024, the Authority published its first call for expression of interest for withdrawn IT equipment and completed its first donations of laptops.
Core business	At least 80% of the EBA's ESG-related mandates, including contributions to the Renewed Sustainable Finance Strategy of the European Commission, are delivered on time	In its Environmental Policy, the EBA committed to implementing ESG considerations in policy making, risk assessment and supervisory convergence work in line with the EBA's tasks, and mandates in the area of sustainable finance. In 2024, 100% of the EBA's ESG-related mandates were delivered on time. See Annex I for further details.
Horizontal	Environmental objectives are established for the management team All staff and in-house consultants completed their EMAS training Sustainability reporting standards are introduced at the EBA	In its Environmental Policy, the EBA committed to developing knowledge, finding technical solutions and adjusting our organisation and behaviours, as well as to setting up key environmental indicators with concrete objectives to demonstrate the efficiency of our environmental management system. In 2024, for the first time, the EBA established environmental objectives for all its managers. Furthermore, EMAS e-learning was developed in-house and launched for all staff at the beginning of 2023. Throughout 2023 and 2024, 280 people completed this obligatory EMAS training: temporary agents, contract agents, seconded national experts, trainees and consultants. They learned a) what EMAS is, how it works, why it was implemented and how it can be beneficial; b) the place of EMAS in a global and European context (UN SDP, Paris Agreement, European Green Deal, EMAS and ISO); c) how EMAS was implemented at the EBA. Additionally, in 2024, the EMAS Green Team and managers followed dedicated training on 'ISO-logy: continuous improvement in a nutshell' (Green Team – 4 July, managers – 21 October 2024). The objective of this training was to understand how the ISO/EMAS approach can help in delivering core activities by, among others, applying the Plan-Do-Check-Act approach in daily business, managing stakeholders and understanding how the continuous improvement of environmental performance supports staff in their activities.

		The objective of introducing sustainability reporting standards, initially foreseen only for 2024, was postponed and expanded as a strategic objective for a three-year period of 2025–2027.

Annex VIII – Annual Accounts

The Final Annual Accounts are published on the EBA website: https://www.eba.europa.eu/about-us/budget

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