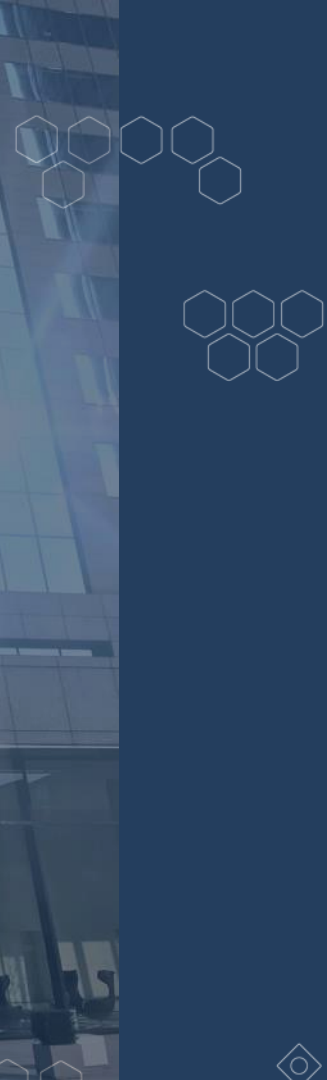
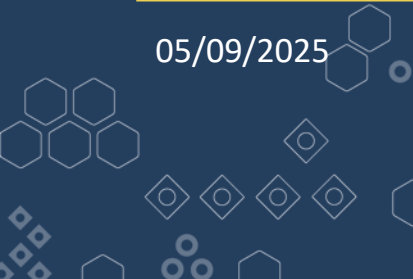




Public hearing - ITS on supervisory reporting of Third Country Branches

05/09/2025



Public hearing functioning

Suggestions for an efficient session

Should you need assistance or would like to intervene:

- **Raise your hand on Teams;**
- **Alternatively, write on Teams chat your questions or comments. Priority will be given to questions raised orally.**

To avoid background noise, please stay muted and with your camera off unless you take the floor.

Please indicate your name and the company that you represent when taking the floor.

Contents

- 1 Timeline
- 2 Overview of the mandate
- 3 Reporting requirements
- 4 Overview of the templates
- 5 ITS articles
- 6 Questions in the CP
- 7 Q&A session

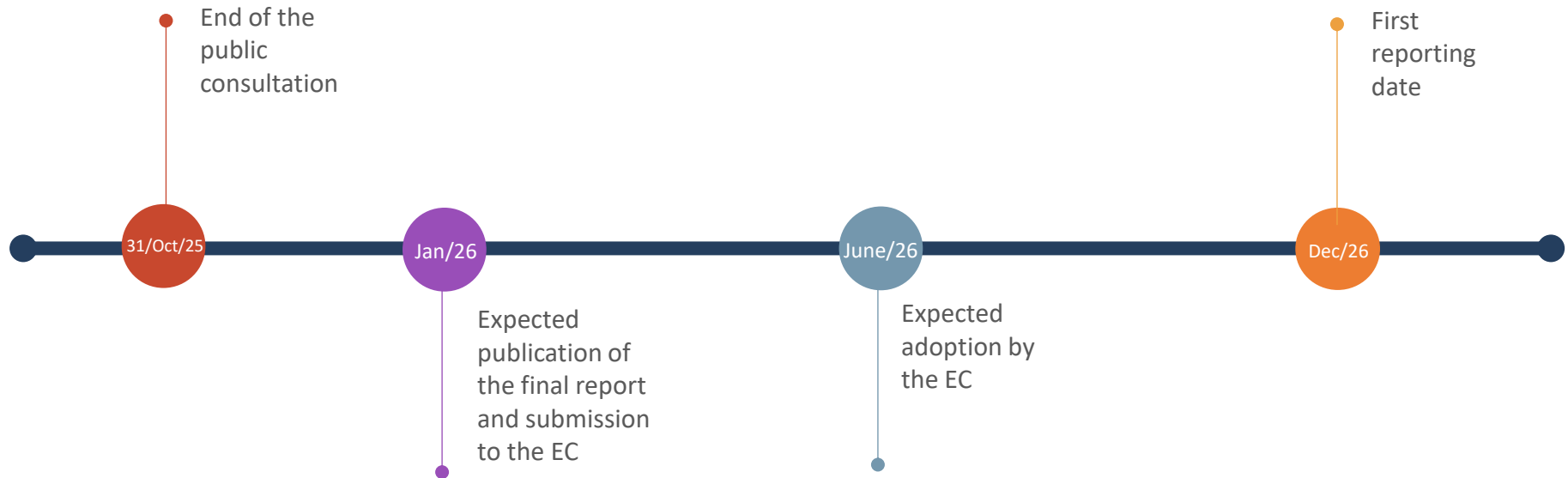
Please note that questions regarding the interpretation of level 1 text (e.g. CRD) are outside the scope of this public hearing



01

TIMELINE

Timeline



02

OVERVIEW OF THE MANDATE

Scope, proportionality and other topics

Overview of the mandate - Extract from CRD VI

LEGAL MANDATE TO THE EBA

Article 48l - Standard forms and templates and frequency of reporting

1.EBA shall develop draft implementing technical standards to specify uniform formats and definitions for, and the frequency of, reporting, and shall develop the IT solutions to be applied for the purposes of Article 48k.

The reporting requirements referred to in Article 48k shall be proportionate to the classification of third-country branches as either class 1 or class 2.

EBA shall submit those draft implementing technical standards to the Commission by 10 January 2026.

Power is conferred on the Commission to adopt the implementing technical standards referred to in the first subparagraph of this paragraph in accordance with Article 15 of Regulation (EU) No 1093/2010.

2.The regulatory and financial information referred to in Article 48k shall be reported at least twice a year by class 1 third-country branches and at least annually by class 2 third-country branches.

3.A competent authority may waive all or part of the requirements to report information on the head undertaking laid down in Article 48k(2) for qualifying third-country branches, provided that that competent authority is able to obtain the relevant information directly from the supervisory authorities of the relevant third country.

Overview of the mandate – Scope

Art 48k(1) – TCBs need to report information on the branch itself
Art 48k(2) – TCBs need to report information on their Head Undertaking

Annex I - Third Country Branches reporting

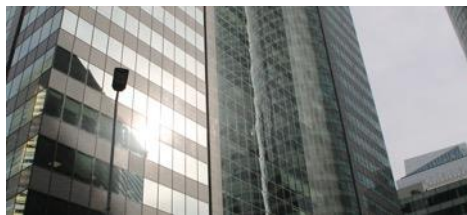
TCBs				
Template number	Template code	Addressees	Legal basis	
Financial information				
1.1	E.O.			
1.2	E.O.			
2	E.O.			
3.1	E.O.			
3.2	E.O.			
4.1	E.O.			
4.2	E.O.			
5.1	E.O.			
5.2	E.O.			
6.1	E.O.			

Annex II - Third Country Branches' head undertaking reporting

HEAD				
Template number	Template code	Addressees	Legal basis	
Quantitative information				
1	U01.00	Class 1 and 2 TCBs	Art 48b.2(a) CRD	Ultimate head undertaking's aggregated
2	U02.00	Class 1 and 2 TCBs	Art 48b.2(a) CRD	Individual contributions from subsidiaries
3	U03.00	Class 1 and 2 TCBs	Art 48b.2(b) CRD	Head undertaking's compliance with the
4	U04.00	Class 1 and 2 TCBs	Art 48b.2(c) CRD	Services provided by the head undertaking
Qualitative information				
5	U05.00	Class 1 and 2 TCBs	Art 48b.2(d) CRD	Head undertaking's significant supervisory
6	U06.00	Class 1 and 2 TCBs	Art 48b.2(d) CRD	Head undertaking's recovery plans

Separate annexes

The ITS will contain two separate reporting: one for the branch itself and another for the Head Undertaking.



Definition of Head Undertaking (HU)

Head undertaking shall be the **direct parent undertaking** and, if justified by the complexity of structure of the third-country group according to the assessment of competent authorities, also the **ultimate parent undertaking**.



Qualitative data

The ITS will cover also qualitative info on the Head Undertaking (SREP, recovery plans, business strategy).

Overview of the mandate – Proportionality

Art 48l(1) – reporting requirements shall be proportionate to the classification of TCBs as either Class 1 or Class 2.



Two categories TCBs

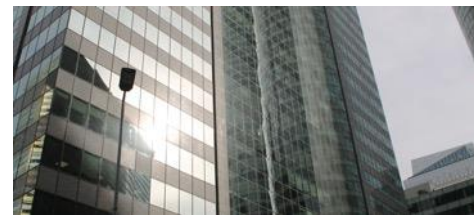
The classification of TCBs in either Class 1 or Class 2 tailors regulatory requirements to TCBs' size, complexity, and risk, ensuring balanced, risk-sensitive supervision.

Annex I - Third Country Branches reporting

Template number	Template code	Addressees
Financial information		
1.1	E 01.01	Class 1 TCBs
1.2	E 01.02	Class 2 TCBs

Core + supplement approach

For some templates, there are two versions where the version for Class 2 (“02”) is a subset of datapoints.



Specifics regarding the head undertaking

No proportionality was implemented for the Head Undertaking information since the whole set of information is relevant regardless the Class of the TCB.

Overview of the mandate - Others



Frequency

Art 48l(2) CRD - Minimum reporting frequencies.

Art 48l(1) CRD - Requirement for the EBA to specify reporting frequencies for the templates.



Subsidiary-like

Art 48a(4) - Member States' optionality to require TCBs the CRR/CRD reporting obligations that apply to credit institutions is outside the scope of this ITS (needs national transposition).



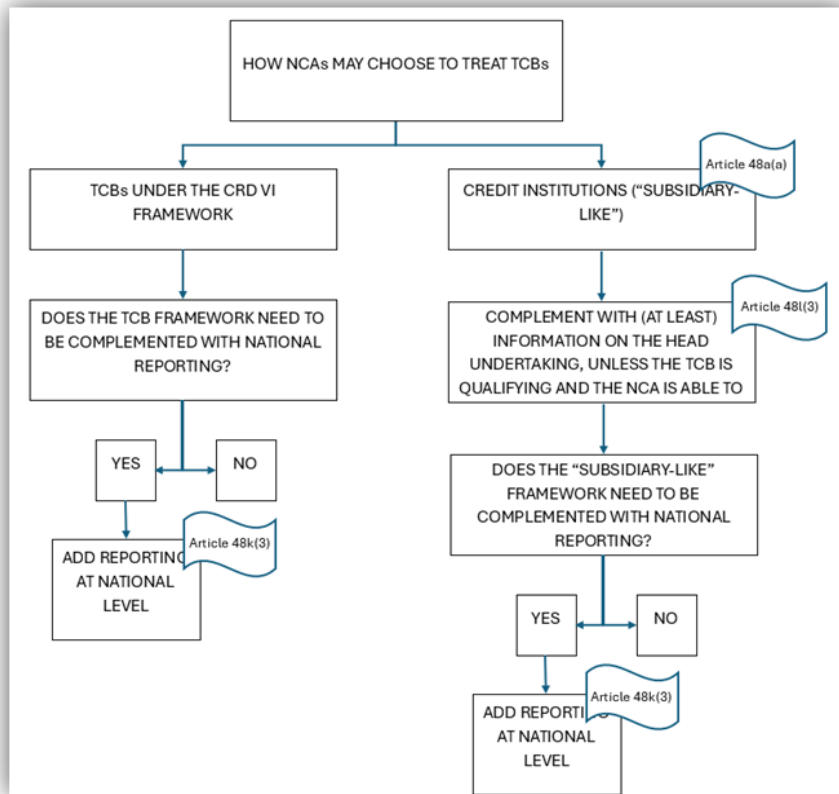
National reporting requirements

Art 48k(1)(d) - No homogenised and standardised templates is required at EU level. Additional regulatory requirements imposed on the TCBs by Member States set by national law.

Overview of the mandate

- TCB treatment

- There are national options for the treatment of TCBs.
- Some components of the TCB regime apply even if the national option to treat TCBs as CIs is chosen.
- Additional regulatory requirements imposed on TCBs by Member States under national law remain unaffected.





03

REPORTING REQUIREMENTS

REPORTING REQUIREMENTS – Extracts from CRD VI (1/2)

REGULATORY AND FINANCIAL INFORMATION ON THIRD-COUNTRY BRANCHES

Article 48k.1. Member States shall require third-country branches to periodically report to their competent authorities information on:

(a) the assets and liabilities held on their books in accordance with Article 48h and the assets and liabilities originated by the third-country branches, with a breakdown that singles out:

- (i) the largest recorded assets and liabilities classified by sector and counterparty type, including, in particular, financial sector exposures;
- (ii) significant exposure and funding source concentrations to specified types of counterparties;
- (iii) significant internal transactions with the head undertaking and with members of the head undertaking's group;

(b) the third-country branches' compliance with the requirements that apply to them under this Directive;

(c) on an ad hoc basis, the deposit protection arrangements available to depositors in the third-country branches in accordance with Article 15(2) and (3) of Directive 2014/49/EU of the European Parliament and of the Council (**);

(d) additional regulatory requirements imposed on the third-country branches by Member States under national law.

REGULATORY AND FINANCIAL INFORMATION ON THE HEAD UNDERTAKING

Article 48k.2. Member States shall require third-country branches to report to their competent authorities the following information on their head undertaking:

(a) on a periodic basis, aggregated information on the assets and liabilities held or booked, respectively, by the subsidiaries and other third-country branches of that head undertaking's group in the Union;

(b) on a periodic basis, the head undertaking's compliance with the applicable prudential requirements on an individual and consolidated basis;

(c) on an ad hoc basis, significant supervisory reviews and assessments, when those are conducted on the head undertaking, and the consequent supervisory decisions;

(d) the recovery plans of the head undertaking and the specific measures that could be taken on the third-country branches in accordance with those plans, and any subsequent updates and amendments to those plans;

(e) the head undertaking's business strategy in relation to the third-country branches and any subsequent changes to that strategy;

(f) the services provided by the head undertaking to clients established or situated in the Union on the basis of reverse solicitation of services in accordance with Article 21c.

REPORTING REQUIREMENTS – Extracts from CRD VI (2/2)

Liquidity requirements

Article 48f - [as embedded in art.48k.1b)

1. Without prejudice to other applicable liquidity requirements in accordance with national law, Member States shall at a minimum require third-country branches to maintain at all times a volume of unencumbered and liquid assets sufficient to cover liquidity outflows over a minimum period of 30 days.

2. For the purposes of paragraph 1 of this Article, Member States shall require class 1 third-country branches to comply with the liquidity coverage requirement laid down in Part Six, Title I, of Regulation (EU) No 575/2013 and in Commission Delegated Regulation (EU) 2015/61 (*).

3. Member States shall require third-country branches to deposit the liquid assets held to comply with this Article in an account held in the Member State where the branch is authorised with a credit institution that is not part of its head undertaking's group or, where permitted under national law, with the central bank of the Member State. [...]

4. Competent authorities may waive the liquidity requirement laid down in this Article for qualifying third-country branches.

Capital endowment requirement

Article 48e - [as embedded in art.48k.1b)

1. Without prejudice to other applicable capital requirements in accordance with national law, Member States shall require third-country branches to maintain at all times a minimum capital endowment that is at least equal to:

(a) for class 1 third-country branches, 2,5 % of the branch's average liabilities for the three immediately preceding annual reporting periods or, for newly authorised third-country branches, of the branch's liabilities at the time of authorisation, as reported in accordance with Sub-Section 4, subject to a minimum of EUR 10 million;

(b) for class 2 third-country branches, 0,5 % of the branch's average liabilities for the three immediately preceding annual reporting periods or, for newly authorised third-country branches, of the branch's liabilities at the time of authorisation, as reported in accordance with Sub-Section 4, subject to a minimum of EUR 5 million.

2. Third-country branches shall fulfil the minimum capital endowment requirement referred to in paragraph 1 with assets in the form of any of the following [...]

REPORTING REQUIREMENTS – Main changes compared to CRD V (1/2)

CRD V	CRD VI
Art.47.1a.(a): the total assets corresponding to the activities of the branch authorised in that Member State	Art. 48k.1(a): the assets and liabilities held on their books in accordance with Article 48h.
Art.47.1a.(b): information on the liquid assets available to the branch, in particular availability of liquid assets in Member State currencies;	Art.48k.1(b): the third-country branches' compliance with the requirements that apply to them under this Directive; Art.48f: liquidity requirements
Art.47.1a.(c): the own funds that are at the disposal of the branch;	Art.48k.1(b): the third-country branches' compliance with the requirements that apply to them under this Directive; Art.48e: minimum capital endowment requirement
Art.47.1a.(d): the deposit protection arrangements available to depositors in the branch	Art.48k.1(c): on an ad hoc basis, the deposit protection arrangements available to depositors in the third-country branches in accordance with Article 15(2) and (3) of Directive 2014/49/EU of the European Parliament and of the Council.
Art.47.1a.(g): the recovery plans covering the branch	Art.48k.2(d) the recovery plans of the head undertaking and the specific measures that could be taken on the third-country branches in accordance with those plans, and any subsequent updates and amendments to those plans
Art.47.1a.(h): any other information considered by the competent authority necessary to enable comprehensive monitoring of the activities of the branch	Art.48k.1(d): additional regulatory requirements imposed on the third-country branches by Member States under national law.

REPORTING REQUIREMENTS – Main changes compared to CRD V (2/2)

CRD VI – Newly introduced reporting requirements

Art. 48k.1(a): the assets and liabilities originated by the TCB, as well as breakdowns on (booked) assets and liabilities that single out:

- (i) the largest recorded assets and liabilities classified by sector and counterparty type, including, in particular, financial sector exposures;
- (ii) significant exposure and funding source concentrations to specified types of counterparties;
- (iii) significant internal transactions with the head undertaking and with members of the head undertaking's group;

Art. 48k.2(a): aggregated information on the assets and liabilities held or booked, respectively, by the subsidiaries and other TCBs of that HU's group in the Union

Art. 48k.2(b): the HU's compliance with the applicable prudential requirements on an individual and consolidated basis

Art. 48k.2(c): significant supervisory reviews and assessments, when those are conducted on the HU, and the consequent supervisory decisions

Art. 48k.2(e): the HU's business strategy in relation to the TCB and any subsequent changes to that strategy

Art. 48k.2(f): the services provided by the HU to clients established or situated in the Union on the basis of reverse solicitation of services in accordance with Article 21c.



04

OVERVIEW OF THE TEMPLATES

Reporting requirements overview – Art. 48k(1) CRD

Annex I - ITS on third-country branches' reporting

Template number	Template code	Addressees	Legal basis	Name of the template /group of templates
Financial information				
1.1	E 01.01	Class 1 TCBs	Point (a) of Art.48k(1) CRD	Assets and liabilities booked and originated by the third country branch (Class 1)
1.2	E 01.02	Class 2 TCBs	Point (a) of Art.48k(1) CRD	Assets and liabilities booked and originated by the third country branch (Class 2)
2	E 02.00	Class 1 and 2 TCBs	Point (a) of Art.48k(1) CRD	Off-balance sheet items of the third country branch (Class 1 and Class 2)
3.1	E 03.01	Class 1 TCBs	Points (a)(i) and (ii) of Art.48k(1) CRD	Largest assets and significant exposure concentrations (Class 1)
3.2	E 03.02	Class 2 TCBs	Points (a)(i) and (ii) of Art.48k(1) CRD	Largest assets and significant exposure concentrations (Class 2)
4.1	E 04.01	Class 1 TCBs	Points (a)(i) and (ii) of Art.48k(1) CRD	Largest liabilities and significant funding sources concentrations (Class 1)
4.2	E 04.02	Class 2 TCBs	Points (a)(i) and (ii) of Art.48k(1) CRD	Largest liabilities and significant funding sources concentrations (Class 2)
5.1	E 05.01	Class 1 TCBs	Point (a)(iii) of Art.48k(1) CRD	Significant internal transactions with the head undertaking and with members of the head undertaking's group - Amounts payable to and amounts receivable (Class 1)
5.2	E 05.02	Class 2 TCBs	Point (a)(iii) of Art.48k(1) CRD	Significant internal transactions with the head undertaking and with members of the head undertaking's group - Amounts payable to and amounts receivable (Class 2)
6.1	E 06.01	Class 1 TCBs	Point (a)(iii) of Art.48k(1) CRD	Significant internal transactions with the head undertaking and with members of the head undertaking's group - Expenses and income generated by transactions (Class 1)
6.2	E 06.02	Class 2 TCBs	Point (a)(iii) of Art.48k(1) CRD	Significant internal transactions with the head undertaking and with members of the head undertaking's group - Expenses and income generated by transactions (Class 2)
Regulatory information				
7.1	E 07.01	Class 1 TCBs	Point (b) of Art.48k(1) and Art. 48e CRD	Computation of the capital endowment requirements (Class 1)
7.2	E 07.02	Class 2 TCBs	Point (b) of Art.48k(1) and Art. 48e CRD	Computation of the capital endowment requirements (Class 2)
8.1	E 08.01	Class 1 TCBs	Point (b) of Art.48k(1) and Art. 48e CRD	Deposited assets covering for the MCER and monitoring of the evolution of the escrow account (Class 1)
8.2	E 08.02	Class 2 TCBs	Point (b) of Art.48k(1) and Art. 48e CRD	Deposited assets covering for the MCER and monitoring of the evolution of the escrow account (Class 2)
9.1	E 09.01	Class 1 TCBs	Point (b) of Art.48k(1) and Art. 48f CRD	Liquidity coverage - calculations (Class 1)
9.2	E 09.02	Class 2 TCBs	Point (b) of Art.48k(1) and Art. 48f CRD	Liquidity coverage - calculations (Class 2)
10	E 10.00	Class 1 and 2 TCBs	Point (c) of Art.48k(1) CRD	Deposit protection arrangements available to depositors in the third-country branches in accordance with Article 15(2) and (3) of DGSD

Reporting requirements overview – Art. 48k(2) CRD

Annex II - Third Country Branches' head undertaking reporting

Template number	Template code	Adressees	Legal basis	Name of the template /group of templates
Quantitative information				
1	H 01.00	Class 1 and 2 TCBs	Point (a) of Art.48k(2) CRD	Ultimate head undertaking's aggregated assets and liabilities in the Union
2	H 02.00	Class 1 and 2 TCBs	Point (a) of Art.48k(2) CRD	Information on the subsidiaries and other third-country branches of the third-country group in the Union
3.1	H 03.01	Class 1 and 2 TCBs	Point (b) of Art.48k(2) CRD	Head undertaking's compliance with the applicable prudential requirements in the third country (Basel III)
4	H 04.00	Class 1 and 2 TCBs	Point (f) of Art.48k(2) CRD	Services provided by the head undertaking on the basis of reverse solicitation of services
Qualitative information				
3.2	H 03.02	Class 1 and 2 TCBs	Point (b) of Art.48k(2) CRD	Head undertaking's compliance with the applicable prudential requirements in the third country (other than Basel III)
5	H 05.00	Class 1 and 2 TCBs	Point (c) of Art.48k(2) CRD	Head undertaking's significant supervisory reviews and assessments
6	H 06.00	Class 1 and 2 TCBs	Point (d) of Art.48k(2) CRD	Head undertaking's recovery plans
7	H 07.00	Class 1 and 2 TCBs	Point (e) of Art.48k(2) CRD	Head undertaking's business strategy



05

ITS ARTICLES

(reporting reference dates, submittance dates, reporting frequencies, etc.)

ITS ARTICLES – Reference dates & submittance dates

Article 1

Reporting reference dates

1. Third-country branches shall submit the information referred to in this Regulation to competent authorities as this information stands on the following reporting reference dates:
 - (a) monthly reporting: on the last day of each month;
 - (b) quarterly reporting: 31 March, 30 June, 30 September and 31 December;
 - (c) semi-annual reporting: 30 June and 31 December;
 - (d) annual reporting: 31 December.
2. Third-country branches shall report the financial and regulatory information referred to in Annex I in accordance with the IFRS or with national accounting frameworks and referring to a certain period cumulatively from the first day of the accounting year to the reference date.
3. Where third-country branches are permitted by national laws to report their financial and regulatory information based on their accounting year-end, which deviates from the calendar year-end, reporting reference dates may be adjusted accordingly, so that the reporting is also done every one, three, six or twelve months from their accounting year-end.

Article 2

Reporting remittance dates

1. Third-country branches shall submit information referred to in Annexes I and II to competent authorities by close of business on the following remittance dates:
 - (a) monthly reporting: 15th calendar day after the reporting reference date;
 - (b) quarterly reporting: 12 May, 11 August, 11 November and 11 February;
 - (c) semi-annual reporting: 11 August and 11 February;
 - (d) annual reporting: 11 February.
2. If the remittance day is a public holiday in the Member State of the competent authority to which the report is to be provided, or a Saturday or a Sunday, data shall be submitted on the following working day.
3. Where third-country branches report their financial information using adjusted reporting reference dates based on their accounting year-end as set out in Article 1(3), the remittance dates may also be adjusted accordingly so that the same remittance period from the adjusted reporting reference date is maintained.
4. Third-country branches may submit unaudited figures. Where audited figures deviate from submitted unaudited figures, the revised, audited figures shall be submitted without undue delay. Unaudited figures are figures that have not received an external auditor's opinion whereas audited figures are figures audited by an external auditor expressing an audit opinion.
5. Other corrections to the submitted reports shall also be submitted to the competent authorities without undue delay.

ITS ARTICLES – Reporting frequencies

Article 3

Reporting frequencies for the regulatory and financial information on third-country branches

Template code	Reporting frequencies	Addresses	Name of the template /group of templates
Financial information			
E 01.01	Quarterly	Class 1 TCBS	Assets and liabilities booked and originated by the third country branch
E 01.02	Quarterly	Class 2 TCBS	Assets and liabilities booked and originated by the third country branch
E 02.00	Quarterly	Class 1 TCBS / Class 2 TCBS	Off-balance sheet items held and originated by the third country branch
E 03.01	Semi-annually	Class 1 TCBS	Largest assets and significant exposure concentrations
E 03.02	Annually	Class 2 TCBS	Largest assets and significant exposure concentrations
E 04.01	Semi-annually	Class 1 TCBS	Largest liabilities and significant funding sources concentrations
E 04.02	Annually	Class 2 TCBS	Largest liabilities and significant funding sources concentrations
E 05.01	Semi-annually	Class 1 TCBS	Significant internal transactions with the HU and with members of the HU's group - Amounts payable to and amounts receivable
E 05.02	Annually	Class 2 TCBS	Significant internal transactions with the HU and with members of the HU's group - Amounts payable to and amounts receivable
E 06.01	Semi-annually	Class 1 TCBS	Significant internal transactions with the HU and with members of the HU's group - Expenses and income generated by transactions
E 06.02	Annually	Class 2 TCBS	Significant internal transactions with the HU and with members of the HU's group - Expenses and income generated by transactions
Regulatory information			
E 07.01	Quarterly	Class 1 TCBS	Computation of the minimum capital endowment requirement
E 07.02	Quarterly	Class 2 TCBS	Computation of the minimum capital endowment requirement
E 08.01	Quarterly	Class 1 TCBS	Deposited assets covering for the MCER and monitoring of the evolution of the escrow account
E 08.02	Quarterly	Class 2 TCBS	Deposited assets covering for the MCER and monitoring of the evolution of the escrow account
E 09.01	Monthly	Class 1 TCBS	Liquidity coverage - calculations
E 09.02	Monthly	Class 2 TCBS	Liquidity coverage - calculations
E 10.00	Semi-annually/ Annually	Class 1 TCBS / Class 2 TCBS	Deposit protection arrangements available to depositors in the third-country branches in accordance with Article 15(2) and (3) of DGSD

ITS ARTICLES – Reporting frequencies

Article 4

Reporting frequencies for the regulatory and financial information on the head undertakings

Template code	Reporting frequencies	Addressees	Name of the template /group of templates
Quantitative information			
H 01.00	Quarterly	Class 1 TCBs / Class 2 TCBs	Ultimate head undertaking's aggregated assets and liabilities in the Union
H 02.00	Quarterly	Class 1 TCBs / Class 2 TCBs	Information on the subsidiaries and other third-country branches of the third-country group in the Union
H 03.01	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Head undertaking's compliance with the applicable prudential requirements (Basel III)
H 04.00	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Services provided by the head undertaking on the basis of reverse solicitation of services
Qualitative information			
H 03.02	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Head undertaking's compliance with the applicable prudential requirements (other than Basel III)
H 05.00	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Head undertaking's significant supervisory reviews and assessments
H 06.00	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Head undertaking's recovery plans and the specific measures that could be taken on the third-country branches in accordance with those plans
H 07.00	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Head undertaking's business strategy in relation to the TCB

ITS ARTICLES – Remaining articles (1/2)

Article 5

IT solutions, reporting templates and instructions

1. The EBA shall ensure that the IT solutions, including instructions, developed pursuant to Article 48(1) of Directive 2013/36/EU comply with the uniform reporting formats laid down in this Regulation at all times and include all the data points and information listed in Annexes I and II to this Regulation.
2. The EBA shall make available on its website the IT solutions, including instructions referred to in paragraph 1. The EBA shall keep those IT solutions up-to-date and available in all official languages.

Article 6

Data exchange formats and information accompanying submissions

1. Third-country branches shall submit the information referred to in this Regulation in the data exchange formats and representations specified by the competent authorities, respect the data point definition of the data point model and the validation formulae referred to in the IT solutions made available on the EBA website, and comply with the following specifications:

- (a) they shall not include information in the data submission that is not required or not applicable;
- (b) they shall submit numerical values as follows:
 - (i) they shall report data points with the data type 'Monetary' using a minimum precision equivalent to ten thousands of units;
 - (ii) they shall express data points with the data type 'Percentage' as per unit with a minimum precision equivalent to four decimals;
 - (iii) they shall not use decimals when reporting data points with the data type 'Integer' and shall use a precision equivalent to units.
- (c) they shall identify institutions and insurance undertakings solely by their Legal Entity Identifier (LEI);
- (d) they shall identify entities and counterparties other than institutions and insurance undertakings by their LEI, where available. When not available, they shall be identified by their National Code.

2. Third-country branches shall, together with the submitted information, submit the following information:
 - (a) reporting reference date and reference period;
 - (b) reporting currency;
 - (c) accounting standard.
 - (d) Legal Entity Identifier (LEI) of the reporting TCB, where available. When not available, their National Code.

ITS ARTICLES – Remaining articles (2/2)

Article 7

Transitional provisions

By way of derogation from Article 1, all third-country branches shall submit information referred to in this Regulation only on an annual basis on the first year of application of this Regulation.

Article 8

Entry into force and application

This Regulation shall enter into force on the day following that of its publication in the *Official Journal of the European Union*.
It shall apply from 28 December 2026.

This Regulation shall be binding in its entirety and directly applicable in all Member States.



06

QUESTIONS IN THE CONSULTATION PAPER

Questions in the CP

Question 1	Are the scope and level of application of the reporting requirements and the content of all the templates and the instructions clear and appropriate?
Question 2	Do the respondents identify any discrepancies between these templates and instructions and the calculation of the requirements set out in the underlying regulation?
Question 3	Do the respondents agree that the ITS fits the purpose of the underlying regulation?
Question 4	Do the respondents consider the transition period and frequency of the first year reporting clear and feasible?
Question 5	<p>Cost of compliance with the reporting requirements: Is or are there any element(s) of this proposal for new and amended reporting requirements that you expect to trigger a particularly high, or in your view disproportionate, effort or cost of compliance? If yes, please:</p> <ul style="list-style-type: none"> ▪ specify which element(s) of the proposal trigger(s) that particularly high cost of compliance, ▪ explain the nature/source of the cost (i.e. explain what makes it costly to comply with this particular element of the proposal) and specify whether the cost arises as part of the implementation, or as part of the on-going compliance with the reporting requirements, ▪ offer suggestions on alternative ways to achieve the same/a similar result with lower cost of compliance for you.
Question 6	In particular, are there any challenges foreseen in obtaining detailed data on the head undertaking or other group entities, especially for Class 2 TCBs? Would further proportionality be helpful, especially regarding remittance date? How could it be implemented?
Question 7	Article 48h(1) of the CRD (as further developed in the RTS on booking arrangements) requires the maintenance of a registry book that allows to track and keep a comprehensive and precise record of all the assets and liabilities booked or originated. Have you foreseen that, according to the proposed breakdown in columns 0050 and 0060 of template E 01.01, such a registry book should also allow you to distinguish between the originated amounts where servicing (or other type of continuing involvement) is maintained and the originated amounts where no continuing involvement is maintained at all?
Questions 8 to 24	Please indicate your comments/answers template by template in the next questions



07

Q&A session

The background of the slide is a dark blue field filled with a repeating pattern of white geometric shapes. These shapes include hexagons, diamonds, and small circles, some of which are arranged in clusters or lines. The pattern is dense and covers the entire background.

Thank you!



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