
SINGLE PROGRAMMING DOCUMENT YEARS 2026-2028 - FINAL

EBA/REP/2025/03 FINAL

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FOREWORD

This single programming document (SPD) sets out the EBA's planning of activities and corresponding resource requirements for years 2026-2028. It considers existing and foreseeable mandates conferred by the legislators, and the risk outlook for the financial sector. It retains sufficient flexibility to redeploy resources and adjust to unforeseen developments and requests.

In 2026, the EBA will start a new cycle after several years of negotiations and preparations of new legislations and responses to shocks. Firstly, it will concentrate on the implementation of new rules. It will continue its work on the banking package (CRD/CRR) and carry out new oversight and supervisory responsibilities in the areas of critical third-party service providers and cyber incidents (DORA), significant issuers of certain crypto assets (MiCA), and initial margin model validation (EMIR). It will be supporting AMLA's start.

Secondly, the EBA will tackle new challenges arising from the financial risks and vulnerabilities outlook. This is due to the changing geopolitical context and rising economic imbalances, as well as to the transformations at play in the financial sector, with environmental and digital transitions. This will require new approaches for assessing risks, preserving financial stability and protecting consumers.

Last but not least, the EBA will support the new European Commission. The co-legislators' initial priorities for the financial sector are already reflected in this SPD: creating a European Savings and Investment Union for market and banking; unlocking bank financing including through securitisation; working on non-bank financial intermediation and digital finance and payments; making a success of the green and digital transitions, reducing administrative and reporting burden. The SPD has been refined in the course of 2025 as more details became available on the implementation of priorities for the new legislative cycle, to reflect recent developments, and to incorporate the work programme for 2026 adopted in September.

Against that background, the EBA refocuses its work on three multi-annual priorities: 1) evolving its rulebook, so that it contributes to an efficient, resilient and sustainable single market; 2) carrying out risk assessments, to adequately support effective analysis, supervision and oversight; 3) tackling and embracing innovation, to enhance the technological capacity of all stakeholders.

With the support of its members, a guiding principle for the EBA is to achieve its missions in a way that best combine stability and efficiency objectives for the financial sector. This will require intensifying the cooperation with relevant EU and third-country authorities, especially when dealing with cross-sector topics like digital, sustainability, financial reporting or non-bank financial intermediation. The EBA will conduct all initiatives aimed at fulfilling its objectives in accordance with the principles of simplification and efficiency.

EBA's work will continue to benefit from its investments to build a modern, flexible and resilient organisation, reaping a high level of synergies (the number of activities has been streamlined from 37 to 19 since 2021, and further simplified and restructured in this document around seven overarching activities), and rolling out an HR strategy that nurtures staff motivation and satisfaction (72% in the 2024 survey). In recent years, it could thus deliver its annual work programmes, including substantial new requests, without having received new resources. In 2026-2028, selected (partly temporary) reinforcements were requested to fill some critical gaps but these were not granted.

François-Louis Michaud
EBA Executive Director

LIST OF ABBREVIATIONS

ACP	EBA Advisory Committee on Proportionality	HR	Human resources
AML/CFT	Anti-money laundering/countering the financing of terrorism	ICT	Information and communication technology
AMLA	Anti-money laundering authority	IFD/IFR	Investment Firm Directive and Regulation
AI	Artificial intelligence	IFRS	International Financial Reporting Standard
ART	Asset-referenced token	IMF	International Monetary Fund
AST	Assistant	IMM	EMIR Initial margin models
BCBS	Basel Committee on Banking Supervision	IRB	Internal ratings-based
BoS	Board of Supervisors	IRRBB	Interest rate risk in the banking book
BRRD	Banking Recovery and Resolution Directive	IT	Information technology
CA	Competent authority	ITS	Implementing technical standards
CRD	Capital Requirements Directive	JC	Joint Committee
CRR	Capital Requirements Regulation	KPI	Key performance indicator
CSDR	Central Securities Depository Regulation	LCR	Liquidity coverage ratio
CTPPs	Critical ICT Third-Party providers	LFS	Legislative financial statement
DGSD	Deposit Guarantee Scheme Directive	MFF	Multi-annual financial framework
DORA	Digital Operational Resilience Act	MiCA	Markets in Crypto-assets Regulation
EBA	European Banking Authority	ML/TF	Money laundering / Terrorism financing
EC	European Commission	MREL	Minimum requirement for own funds and eligible liabilities
ECA	European Court of Auditors	NCA	National competent authority
ECB	European Central Bank	NPL	Non-performing loan
EFIF	European Forum of Innovation Facilitators	PSD/PSR	Payment Services Directive / Regulation
EFTA	European Free Trade Association	Q&A	Questions and answers
EIOPA	European Insurance and Occupational Pensions Authority	RTS	Regulatory technical standards
EMAS	Eco-Management and Audit Scheme	SA	Standardised approach
EMIR	European Market Infrastructure Regulation	SDFA	Supervisory Digital Finance Academy
EP	European Parliament	SNE	Seconded national expert
ESA	European supervisory authority	SREP	Supervisory review and evaluation process
ESG	Environmental, social and governance	STS	Simple, transparent, and standardised
ESIU	European Savings and Investment Union	SPD	Single Programming Document
ESMA	European Securities and Markets Authority	TA	Temporary agent
ESRB	European Systemic Risk Board	TBC	To be confirmed
EU	European Union	TLAC	Total loss-absorbing capacity
EUCLID	European centralised infrastructure for supervisory data	TPP	Third-party provider
FinTech	Financial technology	VAT	Value-added tax
GL	Guidelines		

MISSION, TASKS, VALUES

Mission and vision

The EBA contributes to the stability and effectiveness of the European financial system through consistent, transparent, simple and fair regulation and supervision to the benefit of all EU citizens.

Role and tasks

The EBA is an independent EU agency accountable to the European Parliament, the European Council of the EU and the European Commission. Its role is to improve the functioning of the EU's internal market through appropriate, efficient, and harmonised regulation and supervision, thus contributing to an efficient and stable functioning of the banking and financial system.

The EBA is part of the European System of Financial Supervision together with ESMA and EIOPA, and collaborate closely with the ESRB and relevant competent authorities in the EU and third-countries.

Whilst European and national competent authorities supervise individual financial institutions, the EBA develops a single rulebook for the financial entities in its remit and the authorities which supervise them, through technical standards and guidelines. It promotes a convergent application of these rules, investigating the application of EU law by competent authorities, mediating disagreements between them and taking decisions in emergency situations. Harmonised rules foster a level playing field for financial entities and provide high protection to depositors, investors, and consumers.

The EBA assesses risk and vulnerabilities in the EU banking and financial sector through regular risk assessments in a wide range of areas, including through regular EU-wide stress tests of the banking sector. Finally, it exerts some direct oversight, coordination and supervisory responsibilities.

Values

Public service at the core: The EBA acts independently, in the sole interest of the European Union. It is committed to strengthening the financial sector and protecting consumers through sound regulation.

Excellence in everything the EBA does: It promotes simplicity, objectivity, transparency and proportionality. It learns from successes and failures and continues improving what it does.

Trust in relationships: The EBA builds relationships based on trust, respect and transparency. It is open and responsible for its actions, promises and commitments. It cares about people. It should resemble the European society. And it will abide by high ethical and environmental principles.

Creativity to deal with challenges: The EBA strives to innovate and make a difference, with the belief that change is possible. It pioneers new ways of working to make a difference, and that makes it unique. It has the energy, imagination and courage to lead.

Collaboration is EBA's approach: It values team spirit and cultural diversity. It encourages, seeks and values input and feedback. By having a collaborative mindset, it can work and grow together with all stakeholders.

SECTION I – GENERAL CONTEXT

1. The EBA's multi-annual work programme takes into account the missions stemming from its founding regulation as well as from agreed or prepared EU legislations and the outlook for the financial sector. It is aligned with the Union's priorities and strategies for the financial sector. While a large part of the mandates have legal deadlines, the authority retains flexibility to adjust its work programme throughout the year if circumstances warrant it. Presented in the format applying to EU decentralised agencies, it is endorsed by the EBA's Board of Supervisors upon a proposal from its Management Board.
2. Five drivers and developments impacting EBA's work were considered at the time of planning:

1) EC priorities

Financial services and banking (link)

The European Commission (EC) has outlined several strategic priorities in financial services and banking, particularly in the context of its broader goals for economic resilience, digital transformation, and sustainability. The EC defines the key objectives as follows:

- advance the savings and investments union to **better connect savings and productive businesses**
- **empower Europeans** to take well-informed financial decisions
- build an **EU single market for capital** with appropriate regulation and high-quality financial reporting, while minimising the administrative burden on companies
- create a **robust regulatory and supervisory framework** for banks, insurers and pension funds
- create tools and policies for the financial sector that help the EU reach its **climate and environmental goals**
- enable the financial sector to reap **the benefits of digitalisation** while managing its risks
- **fight money laundering and terrorist financing**, and impose sanctions when needed
- advance **international regulatory cooperation** on all financial matters

Also of direct relevance for the EBA are the [EC's Political Guidelines](#)¹ highlighting the importance of simplification of EU policies and laws, and their better implementation as essential to make business easier and faster in Europe.

Many of these areas are already included and discussed in this SPD. Necessary adjustments will be in future programming documents should objectives and priorities evolve.

Data strategy and reporting burden

The **EU data strategy** aims to create a single market for data and promote data-driven innovation, with improved supervisory data collections² and a European

¹ https://commission.europa.eu/document/download/e6cd4328-673c-4e7a-8683-f63ffb2cf648_en?filename=Political%20Guidelines%202024-2029_EN.pdf

² https://ec.europa.eu/info/publications/211215-supervisory-data-strategy_en.

Single Access Point (ESAP) to company data for investors. The EC's 2026 work programme continues to call for a 25% reduction of administrative burden through regular reviews, a reuse of reported data and easier data sharing between authorities.

The EBA contributes to this strategy through its work on increasing efficiency in reporting processes and EUCLID platform which collects reporting from a wide and growing range of financial entities (banks, IF, payment providers, all DORA TPP users, and MiCA ARTs and EMTs). It will deliver a Pillar 3 data hub for banks' disclosures. As part of its data integration strategy, it will develop a common data dictionary and data sharing infrastructure with key partners (ESAs, ECB).

Simplification agenda

To support the EU's strategic objective of enhancing competitiveness and regulatory efficiency, the European Commission has launched a simplification agenda focused on reducing regulatory and administrative burden and improving the quality of legislation, reviewing empowerments and new legislative initiatives.

The Commission's agenda drives the EBA's efforts which aim to streamline financial regulation and supervision while maintaining prudential integrity. The EBA Report on the efficiency of the regulatory and supervisory framework³ (TFE report) as a first outcome provided 21 recommendations, leading to short- and long-term follow-up actions that seek to preserve the resilience of the EU financial system, enhancing the benefits of the Single Market, and maintain a level playing field across the EU by ensuring appropriate proportionality adjustments while avoiding fragmentation of the Single Rulebook.

2) Legislative files

Financial sector – specific legislation

CRR III /CRD VI (adopted)

Applying in January 2025, the Banking package strengthens banks' resilience to shocks, implementing the final elements of the December 2017 Basel 3 Accord, facilitating a green transition, and strengthening supervisory enforcement. It conferred the EBA 140 mandates for technical standards, guidelines and reports to be delivered by 2028 covering a wide range of (often very technical) areas. Additional challenges may arise from the need to ensure a global level playing field – which may impact the timeline for the implementation of the FRTB-related provisions.

Crisis management and deposit insurance (in negotiation)

The EC 2023 CMDI proposal aims to facilitate an orderly market exit for failing banks of any size and business model, drawing on the experience of BRRD. While there is uncertainty on a final agreement, it should include 20 mandates of which 14 regulatory products and 6 mandates devoted to the monitoring of various aspects of the framework's implementation.

³ Published in October 2025: <https://www.eba.europa.eu/sites/default/files/2025-10/b8e0ef8e-2d49-43fc-b917-dbca3423588c/Report%20on%20the%20efficiency%20of%20the%20regulatory%20and%20supervisory%20framework.pdf>.

Payment services (in negotiation)	The EC's retail payments strategy ^{1F4} envisages a single payments market which fully leverages innovation and benefits its citizens and firms. Its June 2023 proposals for a revised Payment Service Directive (PSD3), a Payment Services Regulation (PSR) and a Regulation on Open Finance (FIDA) build on technical advice provided by the EBA. Based on the additional positions published subsequently by Council and the European Parliament, the EBA is likely to receive around 40-50 mandates. Half of them will have been delivered by end of 2027, with the other half by end of 2028.
ESIU (proposal)	<p>The ESIU plans to leverage private savings to support wider EU objectives and give a new momentum to Capital Markets Union (CMU) files on which the EBA had already advised, including to support a green transition, the development of an integrated European framework for covered bonds, or national insolvency regimes. Work will continue on a Central Securities Depository and EMIR (see below).</p> <p>Moreover, the EC adopted in June 2025 a package of measures to make the EU securitisation framework simpler and more fit for purpose. The proposals seek to facilitate securitisation activity in the EU while continuing to safeguard financial stability and include giving a more prominent role for the EBA in the Securitisation Committee of the Joint Committee of the ESAs.</p>
Consumers (to be seen)	While the EC has postponed its reviews of the Mortgage credit and Consumer credit directives, work in this area may resume towards 2028.
Investment firms (to be seen)	The EBA stands ready to contribute to a review of the IFD/R should the EC follow up on the advice the authority provided in 2025.
Horizontal legislation	
Artificial intelligence (adopted)	Excellence in AI and a trustworthy AI should allow people and businesses to safely enjoy the benefits of AI. A European approach will introduce safeguards to the functioning of markets and the public sector, and people's safety and fundamental rights. The EBA will reflect in its rulebook and risk analyses how AI and machine learning (ML) impact bank business and risk management approaches, financial stability and consumer protection.
Cybersecurity (adopted)	The EU Cybersecurity Regulation ⁵ (Regulation (EU, Euratom) 2023/2841) requires the EBA like all institutions and bodies of the Union to substantially strengthen their cybersecurity setup.
Sustainable Finance (in negotiation)	As mentioned above, the new EC has signalled its intention to revisit the granularity and practicality of the provisions arising from the Green Deal to ensure a proper balance between costs and benefits. The EBA will finalise the incorporation of ESG risks in the prudential framework as part of the banking package (see above), covering disclosure, supervisory reporting, supervision, risk management, governance, prudential treatment of exposures, stress testing, and risk monitoring. It will reflect any adjustments decided by the EU co-legislators.

⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0592>.

⁵ <https://eur-lex.europa.eu/eli/reg/2023/2841>.

Digital Euro (in consideration)

The EC's single currency package includes a legislative proposal for a digital euro as a complement to euro banknotes and coins. They mandate EBA and AMLA to issue guidelines on the interaction between AML/CFT requirements and the provision of basic digital euro payment services focussing on financial inclusion.

3) New roles
DORA

Applicable from January 2025, DORA aims to strengthen the operational resilience of the EU financial sector towards Information and Communications Technologies. It streamlines, upgrades and complements existing rules for ICT risk management (including threat-led penetration testing) for a wide range of financial entities. It required the ESAs to enrich the Single rulebook, establishes them as lead overseers for ICT Third-Party providers critical to the EU financial sector, and put them in charge of a cyber incident reporting framework. After a ramp-up of the operational setup in 2025, the ESAs are starting their oversight activities in 2026 and are expecting to operate in a steady-state manner over the 2026-2028 period.

MiCA

After a ramp-up of its operational setup early 2025 when MiCA fully applies, the EBA expects to exercise its supervision activities over some issuers of asset-referenced tokens (ARTs) and e-money tokens (EMTs) in 2026 and should operate in a steady-state manner over the 2026-2028 period. In addition to having enriched the Single rulebook in 2023-2024, the EBA will have to determine which of these ART and EMT issuers are significant, supervise those, and issue regular opinions at the request of national competent authorities on the regulatory classification of crypto assets. It will support the EC for its reports preparing the MiCA review.

EMIR

From December 2024, EMIR3 requires the EBA to validate certain centralised initial margin models (IMM) used for non-centrally cleared derivatives transactions in coordination with national competent authorities. After having developed the necessary infrastructures, methodologies and processes in 2025, the EBA expects the validation activity to become operational in 2026 and to operate in a steady-state manner thereafter.

ESIU

The review of the EU Securitisation Framework seeks inter alia to make better use of existing supervisory structures, enhance collaboration among authorities, and ensure effective supervision through enhanced convergence and improved coordination. In that context, it is proposed that the EBA will play an enhanced role coordinating the JCs Securitisation Committee, whose mandate will be reviewed to focus primarily on issues stemming from supervision, to ensure better coordination among the different authorities involved and to put emphasis on supervisory convergence.

AMLA

In 2026, the EBA will have transferred all its standalone AML/CFT mandates, powers and resources to AMLA. Close cooperation will be needed to facilitate AMLA's start and ensure a consistent and holistic tackling of ML/TF risks of financial entities in the prudential framework.

4) Geopolitical, economic and other developments

The ongoing geopolitical uncertainty caused by the war in Ukraine and the acute crises in the Middle East, coupled by rising needs for defence and infrastructure across Europe have created an uncertain macroeconomic environment. The situation is not helped by the political uncertainty and limited fiscal capacity in

several member states. Geopolitical developments are also linked with an increase in cyber incidents which represent a rising threat for financial stability. Climate deterioration has accelerated globally and may need stepping up the environmental transition. Against that background, economic and financial conditions and downside risks remain, creating increasing challenges for the banking sector despite its remarkable withering of successive shocks in recent years.

The EBA will maintain a high level of attention to such developments and coordinate closely with all relevant stakeholders with a view to facilitating risk identification through adequate tools and exercises for its stakeholders, and proposing relevant policy and crisis management responses as necessary.

5) EU and international cooperation

New legislations and cross-cutting challenges (conduct, cyber, ESG, NBFIs...) require the EBA to intensify or establish relationships with other EU and international authorities and bodies in (e.g. ESAs' Joint Committee, ESRB, FSB, Basel Committee), including beyond the financial sector (e.g. NGFS, EFRAG, information security agencies). The EBA will support the EC in the context of the EU enlargement. The EU's association agreement with Andorra and San Marino also involves technical advice and new responsibilities.

SECTION II - MULTI-ANNUAL PROGRAMMING (2026-2028)

1. MULTI-ANNUAL PRIORITIES AND WORK PROGRAMME

3. This section describes medium term, strategic priorities and areas of work for the EBA, the actions involved, and how progress will be monitored. It takes into account existing and foreseeable mandates, including the outlook for the financial sector. The multi-annual priorities support the internal allocation of resources and sequencing of the work, and to keep focus. They also facilitate EBA's engagement with external stakeholders.⁶
4. In 2026, the EBA will start a new cycle of its activities after several years of negotiations and preparations for new legislations. Firstly, it will concentrate on the full implementation of the new rules (CRDVI/CRRIII, DORA, MiCA, EMIR, AMLA). Secondly, it will tackle new challenges arising from the risks and vulnerabilities outlook, including a changing geopolitical context and rising economic imbalances, as well as from the transformation of the financial sector through environmental and digital transitions. Finally, it will support the new EC's priorities and strategies for the financial sector (see Section I).
5. Against that background, the EBA will refocus its work on three priorities for years 2026-2028.

Three priorities for 2026-2028



6. The priorities and work programme may need to be refined as the European legislators update their objectives and initiatives and reflects guidance of EBA's BoS discussions in 2025. Adjustments may also be warranted as a result of geopolitical, economic and financial developments.

Priority 1 – Rulebook: Contributing to an efficient, resilient and sustainable single market

7. This priority relates to EBA's core responsibilities of (a) developing a single rule book and (b) ensuring its consistent implementation for the activities and supervision of the financial entities in its remit, to contribute to an efficient, resilient and sustainable single market in banking and financial services. After more than a decade of ex ante harmonisation work, more importance will be given to ex-post harmonisation. The authority will also strive to ensure the right balance for the comprehensiveness,

⁶ The fact that one mission or responsibility is not mentioned does not imply that it will not be discharged or is less important but simply that the need for specific focus is lesser.

proportionality and simplicity of the rules, having in mind the EU legislators' objective of reducing reporting burden and the need to facilitate the use of the rulebook.

a) A single rulebook that is fit for purpose

8. The EU's CRR VI/CRDIII tasks the EBA with ca 140 new mandates to be delivered between 2024 and 2028, which will be done factoring in consistency and proportionality considerations. By mid-end 2026, the EBA will prioritise the Basel III implementation and the mandates related to the access to the EU market for third-country branches or consolidation in the banking system. By mid-2028, it will reflect on the intended and convergent application of the provisions.⁷ The EBA will also analyse institutions' exposure to shadow banking entities, and will assess their contribution to the Capital Markets Union.
9. The EBA will continue examining whether existing rules are necessary, overlapping or underlapping, and, where necessary, if they should be better articulated and simplified. The EBA may need to follow up to its reflections on how to streamline the capital/buffer/MDA requirements, as well as the multitude of own funds, leverage and TLAC/MREL requirements (TFE recommendation 9).
10. As part of the EU's European Savings and Investment Union, the EBA will be delivering supporting the establishment of Central Securities Depository functions and the stability of central clearing activities. It expects to further contribute to a revival of a secure securitisation market. Areas of focus will include ensuring that the green transition will also be supported through securitisation and on developing an integrated European framework for covered bonds, based on high-quality standards and best market practices. As part of the ESIU, the EC adopted in June 2025 a package of measures to make the EU securitisation framework simpler and more fit for purpose. The proposals include giving a more prominent role for the EBA in the Securitisation Committee of the Joint Committee of the ESAs.
11. The April 2023 EC's proposals for a strengthened Crisis management and deposit insurance (CMDI) aim to enable an orderly market exit for failing banks of any size and business model and better protect depositors through harmonising standards across the EU. They involve amendments to the Bank Recovery and Resolution Directive (BRRD), the Daisy Chain Act, the Deposit Guarantee Schemes Directive (DGSD) and the Single Resolution Mechanism Regulation (SRMR). The EBA would be asked to issue requirements inter alia on the methodology for the calculation of the target level, elements to be contained in business plans, the methodology for calculation of estimated cost of intervention, calculation of DGS contributions, and information to be provided to depositors. The EBA would also be asked to monitor the implementation of the resolution framework and to contribute to the testing of its effectiveness. Uncertainty about the final agreement impacts on when work on related mandates will start.
12. The EBA will take forward actions as appropriate following the ESRB Recommendation on third-country multi-issuer stablecoin schemes (ESRB/2025/9)⁸ and contribute to EC's review of MiCA (Article 140) especially on the continuing suitability of the MiCA perimeter, and depending on actions proposed by the EC in their interim and final reports to the European Parliament and Council by 30 June 2027.

⁷ <https://www.eba.europa.eu/publications-and-media/press-releases/eba-publishes-roadmap-implementation-eu-banking-package>.

⁸ <https://www.esrb.europa.eu/pub/pdf/recommendations/esrb.recommendation251020.en.pdf?469ebdea563699c20de7008b8a997e0>

Similarly, the EBA will advise on the EC's review of DORA (Article 58) foreseen by 17 January 2028, in relation to (i) criteria for the designation of critical ICT third-party service providers, (ii) powers of the lead overseer, (iii) functioning of the Joint Oversight Network and Oversight Forum, (iv) voluntary nature of the notification of significant cyber threats and (v) the scope of the Regulation. This may result in revisions to the DORA technical standards, if recalibrations or new guidelines are needed.

13. In relation to payment services, the EBA may need to develop up to 50 new security, prudential, authorisation and consumer protection mandates under the forthcoming PSD3, PSR and FIDA proposals. It will take into account the expected increased uptake by consumers of instant payments as a result of the revision of the Instant Payments Regulation in 2024 and will monitor the impact of the anti-fraud measures imposed through EU law, such as the Verification of Payee (VoP), transaction monitoring and enhanced strong customer authentication.
14. As the banking package includes a number of regulatory ESG-related mandates, the EBA currently plans to continue systematically embedding ESG in its regulatory and policy work, including in its work on the prudential treatment of exposures, and on integration of ESG in supervisory reporting . It will take into account new developments as already signaled by the EC in this area.
15. The EBA will closely cooperate with the newly established AMLA and support it to ensure that ML/TF aspects are properly embedded in the prudential framework (CRD/CRR, PSD/PSR, MiCA).

KPIs

	Indicator (and type)	Weight	Short description
A1	Number of technical standards, GL, reports delivered (Outputs ⁹)	80%	Number of technical standards, GL and reports delivered on time stemming from the implementation of the risk reduction package and the implementation of the CRD VI / CRR III / BRRD III / CSDR
A2	Number of technical standards, GL, reports delivered (Outputs)	20%	Number of technical standards, GL and reports delivered on time stemming from the implementation of DGSDIII / PSR-PSD3-FIDA.

Indicators measure contribution to the single rulebook (the delivery of mandates follows different timelines).

This may be adjusted to introduce a KPI on simplification or competitiveness when more details are available from Commission

	Baseline	Target 2026	Target 2027	Target 2028
A1	80%	85%	90%	90%
A2	80%	80%	85%	90%

Baseline is based on achieving 80% delivery of the regulatory mandates set out in the EBA's annual work programme. Increasing targets beyond 90% is unrealistic as it removes room for manoeuvre and flexibility that is necessary to adjust to priorities to developments regarding the work programmes.

⁹ According to the Annex to the Communication from the Commission on the strengthening of the governance of Union Bodies under Article 70 of the Financial Regulation 2018/1046 and on the guidelines for the Single Programming Document and the Consolidated Annual Activity Report, KPIs can focus on:

- Inputs - the human and financial resources used and the time required to produce outputs;
- Actions - the work carried out over a certain period of time, consuming resources and producing outputs in accordance with the objectives set;
- Outputs - what is directly produced or supplied through the agency intervention and identified based on its operational objectives;
- Results - the direct effects of interventions on the target groups;
- Impacts - the indirect or long-term effects of an intervention on the EU or global society that are, at least partly, expected to be influenced by agency intervention.

b) Targeted efforts to support convergence

16. As indicated, the EBA will attach more importance to ex-post harmonisation and further integrate the various dimensions of its efforts (peer reviews, monitoring, benchmarking, Q&As etc.) and increase their respective importance. As part of this the EBA will continue monitoring the implementation of the rulebook with a view to foster supervisory convergence and level-playing field, hence reducing any unnecessary regulatory and supervisory burden for financial entities within the Union.
17. The EBA's efforts in fostering convergence at an early stage include developments to help stakeholders understand how to practically and adequately implement regulatory the provisions; examples include monitoring reports on capital (CET1 and AT1) and liquidity (LCR and NSFR), supervisory convergence reports, and developing priorities for IRRBB monitoring, supervisory practices concerning the implementation of DORA. In the case of MiCA, the EBA will be responsible for monitoring asset-referenced and e-money tokens and issuing opinions at the request of NCAs on the regulatory classification of crypto-assets. In addition, EBA will review the MiCA supervisory handbook on EMT/ART issuers to adjust to current supervisory practices and market developments.
18. The EBA will also monitor the implementation of prudential consolidation provisions and work on the related follow-up report.
19. The EBA also develops tools to support competent authorities in their daily tasks: IFRS 9 benchmarking report, IRRBB heatmap and other benchmarking tools for supervisors. As regards MiCA, EBA will foster convergence of supervisory practices regarding the authorisation and supervision of issuers of ARTs/EMTs through a dedicated Crypto asset standing committee and discussions with NCAs on supervisory techniques. The EBA will also have intervention powers to prohibit or restrict activity related to asset-referenced or e-money tokens in relevant cases.
20. Following delivery of the mandates assigned under the forthcoming PSD3 and PSR and FIDA, the EBA will focus its efforts from c. mid-2028 onwards on supervisory convergence and enforcement of these texts across the EU, so as to bring about a harmonised supervision of these mandates by NCAs and a consistent implementation by the industry. The aim is to achieve the stated objectives of these texts of enhancing competition in the EU payments market, making payments secure, protecting consumers, facilitating innovation, strengthening the single EU payments market. and achieving all of this in a technologically neutral way. In the process, the EBA will continue taking a strategic approach to the supervision of the Level-1 texts pertaining to payment services in the EU, will proactively identify and address gaps and inconsistencies between them, with a view to enhance the efficiency with which the mandates are developed, supervised and implemented.,
21. Considering a forward-looking perspective, proposals can be conveyed to the co-legislators on possible ways to improve convergence, through technical advice or views on how the regulatory framework is operating or could operate more efficiently within the EU but also internationally, with a view to ensuring competitiveness of the EU banking sector. A recent example is the report on stacking orders and capital buffers where further work is being done with a view to provide technical advice on governance arrangements or on the simplification of the framework, with all its components, taking into consideration interactions and triggers between Pillar 1 and Pillar 2. The TFE report included a number of recommendations of relevance in this context.

22. While the discussions on CMDI continue, it is expected that the revised framework envisages a role for the EBA for coordinating and overseeing EU-wide crisis simulation exercises. More specifically, this should cover in a holistic manner the coordination and cooperation between competent authorities and resolution authorities during the simulations, testing the application of the toolbox in recovery and resolution planning, early intervention, and resolution. In particular, such exercises should assess the cross-border dimension of the interaction between the relevant authorities and the application of the available tools and powers. Where relevant, the crisis simulation exercises should also capture the adoption and implementation of resolution schemes within the Banking Union, pursuant to Regulation (EU) No 806/2014.
23. Convergence can also be further increased at various stages of policy implementation, through information-gathering, education, monitoring, assessments and enforcement measures for supervisors or institutions, and adequate communication. This includes efforts carried out by the EBA in terms of peer reviews (see workplan in Annex XIV) or under the Q&A process, the participation in and monitoring of supervisory and resolution colleges, and training for supervisors including in the context of the Supervisory Financial Digital Academy and topical discussions, for instance on AI Act implementation.
24. Enforcement measures include the resolution of disagreements between competent authorities and breach of Union law investigations. Investigations and enforcement measures under MiCA/DORA will also develop over the period as direct supervision and oversight commence. With the development of oversight and direct supervisory work, the EBA will look to consolidate its approach to enforcement and supervisory convergence, bringing a more consistent approach to the methods use across the different areas of its work.

KPIs

	Indicator (and type)	Weight	Short description
A	Convergence-enhancing initiatives	70%	Identify and implement supervisory convergence tools across the banking, payments and crypto-asset sectors covered by the EBA (e.g. supervisory priority-setting and monitoring, supervisory colleges and handbook, statements and opinions, case studies, simulation exercises, monitoring and benchmarking, mediation, breaches of Union law assessments)
B	Peer reviews	30%	Conclude 6 peer reviews / supervisory independence assessments and 6 peer review follow-ups

	Baseline	Target 2026	Target 2027	Target 2028
A	1 initiative	> 1 initiative	> 1 initiative	> 1 initiative
B	2 peer reviews + 3 peer review follow-up (2025 planning)	2 + 2	2 + 2	2 + 2

Baseline: Convergence enhancing initiatives and peer reviews enable assessment of need for measures, A. Baseline of 1 initiative based on experience in past years. Targets aimed to go beyond this in coming years. B. Baseline of 2 peer reviews and 3 follow-up peer reviews based on 2025 planning. Targets somewhat limited by resource constraints.

Priority 2 – Risk assessment: Developing tools, data and methodologies for effective analysis, supervision and oversight

25. This priority relates to (a) EBA's responsibility of assessing risks and vulnerabilities in the EU/EEA banking and financial sector through regular and ad hoc analyses, as well as to (b) its new roles as i) the

lead overseer of critical ICT-third party service providers, ii) supervisor of significant asset-referenced and e-money token issuers and iii) validator of certain EMIR IMM models, and (c) its need for reliable and adequate data supporting efficient methodologies and tools as an enabler of (a) and (b).

a) Regular and ad hoc EU-wide risk assessments

26. The EBA will continue enhancing its framework for assessing risks in the EU/EEA banking sector in general, to be well equipped to identify and respond to evolving risks. It will integrate ESG and NBFI risks across the framework and regularly provide a set of indicators. The current volatile geopolitical and economic circumstances and related uncertainty require substantial effort to track and report related developments in and challenges to the EU/EEA banking sector, using the EBA Risk Assessment report (RAR) as a key communication tool with stakeholders.
27. The EBA's stress testing capacity and experience is undergoing a strategic streamlining to reduce the burden on both supervisors and institutions while preserving its analytical value. Central to this simplification is the effort to refine the bottom-up approach by reducing the complexity and volume of data templates, aligning stress test metrics more closely with supervisory reporting, and targeting unnecessary duplication. This aims to lower reporting costs for banks and enhance the efficiency of supervisory processes without compromising data quality and maintaining transparency as much as possible. In parallel, a more balanced and hybrid stress testing framework is being advanced, combining top-down and bottom-up methodologies. A collaborative platform will be established to facilitate the joint development and use of top-down models. In addition to developing top-down elements, greater consideration will be given to tackling cross-sector topics such as climate-change related risks – transition and physical – or NBFI leveraging the experience of the “Fit for 55” climate scenario analysis performed along with other ESAs and the ECB in 2024. The availability of (currently limited) resources will be key to ensure progress in this area.
28. Regarding the financial sector's operational resilience, the EBA will operate a cyber incident coordination mechanism with the two other ESAs, the EU Systemic Cyber Incident Coordination Framework - EU-SCICF, and carry out assessments of major ICT-related incident information, and of the threat and vulnerabilities landscape, which should benefit all stakeholders and facilitate synergies amongst them. Following DORA requirements, EBA together with other ESAs will issue annual reports on ICT major incidents, providing the number, nature, and impact of incidents on financial entities and clients, as well as remedial actions and costs incurred.

KPIs

	Indicators (and type)	Weight	Short description
A	Key milestones to upgrade of ST methodology and development of a hybrid model	70%	1. Approve revised 2027 EU-wide stress test framework by Q1 2026. 2. Design new ST methodology by end-2026. 3. Implement revised EU-wide stress test framework for the 2027 exercise. 4. Further develop the stress test framework (e.g. to allow more top-down elements)
B	Design climate stress test module and Guidelines on climate scenario analysis	30%	1. Development of climate stress test module. 2. Development of Guidelines on climate scenario analysis. 3. Implementation of climate stress test module.
Indicators measure contribution to assessment of risks in financial sector and to green transition.			

	Baseline	Target 2026	Target 2027	Target 2028
A	Work plan	70% (preparation for 2027 stress test exercise)	100%	70% (preparation for 2029 exercise)
B	Work plan	70% (of climate stress test module)	100% (of climate stress test module)	70% (of climate stress test as module or integrated)
Baseline: A. Work plan serves as baseline for targets. Work plan is cyclical for regular stress test exercise and reflects lessons learned from previous exercises, as well as guidance and directions received from the Board of Supervisors. B. Work plan also serves as baseline for climate stress test module. Focus here is on development of module for future integration into in the EU-wide stress test framework (to be confirmed).				

b) Effective oversight and supervision (DORA, MiCA, EMIR)

29. DORA foresees that one ESAs will be appointed as Lead Overseer for each critical ICT service third-party provider (CTPP). To ensure efficient oversight activities, the ESAs established a joint oversight function which pools the resources allocated by the legislation to carry out the oversight tasks with the support of NCAs in the Joint Examination Teams (JETs). This aims at ensuring maximum consistency in the approach towards CTPPs, optimising the use of resources including for their allocation over time, and facilitating the development of a common oversight culture in a largely uncharted territory. The EBA started oversight activities with the first designation of CTPPs throughout 2025 and envisages to be fully operational in 2026.
30. MiCA gives the EBA the responsibility of assessing the significance of ARTs and EMTs on an annual basis. Additionally, issuers may voluntarily request their home competent authority to classify their ART or EMT as significant. The EBA will conduct such assessments and reassessments based on reported data, and in the case of voluntary requests for classification, based on a notification from the competent authority and demonstrated likelihood that the ART or EMT will fulfil MiCA criteria. Once an ART or EMT is classified as significant, the relevant supervisory responsibilities are transferred from the respective competent authority to the EBA, and vice versa. In addition, the EBA has to establish, manage and chair a supervisory college for each issuer of significant ARTs and significant EMTs.
31. The EMIR review mandates the EBA to develop a framework for the validation of certain centralised initial margin models (IMM) used for non-centrally cleared derivatives transactions. This should contribute to synergies and simplifications for concerned financial entities and their supervisors. The EBA will shape its central validation function in collaboration with the NCAs and other international authorities such as from the US given the prominence of the specific models in this remit. Resources were foreseen for running the validation function but not to set it up.

KPIs

	Indicator (and type)		Weight	Short description
A	Performance of oversight of CTPPs	DORA	50%	Implementation of the oversight of CTPPs jointly with EIOPA and ESMA.
B	Performance of supervision (Outputs / Results)	MiCA activities	50%	As part of the MiCA mandate, EBA undertakes significance assessment of issuers of ART/EMT and, if applicable, carrying out MiCA supervisory activities in accordance with the supervision plan
Updated indicators measure preparation for and execution of new activities.				

	Baseline	Target 2026	Target 2027	Target 2028
A	CTPPs oversight	Execution of a first year oversight programme (all CTPPs covered, first batch of oversight activities)	Fully-fledged oversight activities; first batch of remediations achieved by CTPPs	Objectives in the oversight to reduce interdependencies and systemic ICT risks
B	MiCA supervision plan	Significance assessment of ART/EMT within set timelines and procedures and if applicable execution of annual supervision plan	Significance assessment of ART/EMT within set timelines and procedures and if applicable execution of annual supervision plan	Significance assessment of ART/EMT within set timelines and procedures and if applicable execution of annual supervision plan
Baseline: A. Baseline reflects objective to achieve the steady state oversight of CTPPs, and targets reflect this. B. Significance assessment as set out in MiCA serves as baseline in the current environment where the crypto market development is still uncertain. Ultimately, objective is achievement of steady state supervision when ART/EMT is classified as significant.				

c) Adequate data, tools and methodologies

32. The updated EBA Data Strategy 2026-2028 is helping to ensure that its data sets, infrastructure, analysis tools and processes meet the demands of risk assessment, stress testing, supervisory and oversight tasks in years in question. Building on its data infrastructure (EUCLID), the EBA will continue to develop data and analytical services for internal and external stakeholders, building on recent innovation and AI, under high standards of timeliness and reliability.
33. The EBA will further develop its offer of regulatory data to a broad audience with a special focus on analysts and researchers in order to best support market discipline and policy development. The Pillar 3 data hub covers all prudential disclosures for credit institutions and the EBA will also provide a platform with comprehensive sets of easily accessible aggregated data. The EBA will continue to build capabilities for regular data sharing and exchanges between authorities to avoid duplicated data requests and maximise efficiencies for public authorities and reporting institutions. In the area of MiCA, a shared reporting platform derived from EUCLID limits reporting burden for submitting entities and ensure timeliness and a broad market view at a low cost for authorities. Capacity to use other, external, data sources will be built to support new tasks and ensure efficient, reporting-neutral data acquisition.
34. By increasing the use and re-use of regulatory data the EBA will continue to contribute to the EU Supervisory Data and Strategy. Reducing the reporting burden will continue to drive EBA's reporting processes through the development of a common data dictionary and integrated reporting frameworks together with ongoing review of proportionality of the reporting framework. Specifically, the EBA will ensure it regularly reviews reporting requirements, remove any redundant or obsolete ones, and keep the reporting burden to a minimum, as well as to consider reusing existing data before introducing new requirements with a view to make the reporting process more efficient and less costly for reporting entities. Data collections will be systemically envisaged in line with the principle of proportionality.
35. The EBA will intensify its efforts for developing with relevant stakeholders a consistent and integrated reporting system for collecting statistical, resolution and prudential data to further increase standardisation, by way of common definitions and avoidance of redundancies. The EBA upgraded data dictionary (EBA-EIOPA DataPointModel 2.0) will form the basis for the common data dictionary for the banking sector and work will continue to complete the integration of glossaries to form a common data

dictionary covering statistical, resolution and prudential data. The work will also expand to cross-sectoral integration of reporting together with EIOPA and ESMA.

KPIs

Indicators (and type)*		Weight	Short description
A	Timeliness of reporting (%)	25%	EUCLID: Accepted modules/ Expected modules,by remittance date +10 working days (wd)
B	Completeness of reporting (%)	25%	EUCLID: Not reported/ Expected templates, by remittance date +10 wd.
C	Accuracy of reporting (%)	25%	EUCLID: Failed error rules/ Total of error rules executed per file, by remittance date +15 wd.
D	Time to publish Quarterly Risk Dashboard (nr days)	25%	Working days from final remittance date of supervisory data (based on EBA's DC 404) to date of publication on EBA's webpage of RDB.
Indicators measure data quality and timeliness			

	Baseline	Target 2026	Target 2027	Target 2028
A	>95%	> 95%	>95%	>95%
B	<0.1%	< 0.1%%	< 0.1%	< 0.1%
C	<0.1%	< 0.1%	< 0.1%	< 0.1%
D	<15	< 15	< 15	< 15

Baselines: Timeliness, completeness, and accuracy results are based on largest institutions only and calculated considering the main supervisory modules. Baseline have been tightened, given that data scope and new reporting is stabilising. However, indicators are kept stable given the high baseline levels.

Priority 3 – Innovation: Enhancing technological capacity for all stakeholders

36. EBA's third priority is to (a) enhance technological capacity within the financial sector with (b) special attention paid to consumer protection. This will be supported by the EBA's involvement in the ESA's European Financial Innovation Forum, which it will chair in 2026, and the EC's SDFA, to promote cross-sectoral and cross-disciplinary dialogue on innovation issues.

a) Enhancing technological capacity

37. Digital operational resilience and innovation are closely linked, and innovation-related work will be undertaken in close liaison with the DORA joint oversight function. Interlinkages include operational tasks (e.g. incident information assessment, coordination of threat-led penetration testing, and operation of the EU systemic cyber incident coordination framework), as well as supervisory capacity-building and convergence work (e.g. development of reports on incident trends and information, issuance of warnings and statistics on ICT threats and vulnerabilities).
38. To enhance technological capacity for all stakeholders, the EBA will continue promoting the application of innovative SupTech and AI based technologies as a key driver of operational performance and productivity. It will encourage joint projects and data sharing to leverage on collective expertise and resources with NCAs and other EU agencies, and identify SupTech tools that can enhance the oversight and supervision performance, with an emphasis on tools with potential common interest among authorities. EUCLID and its extension with calculation, validation and dissemination capabilities, will remain EBA's SupTech flagship platform. Additionally, EBA plans to move towards code and data sharing with NCAs (ie Net Interest Income platform) and implement AI algorithms and machine learning capabilities, with the vision to become a data driven organisation.

39. To foster innovation while maintaining high standards of consumer protection, the EBA will continue work on priority innovative applications focussing on artificial intelligence and machine learning (AI/ML) applications in the EU's banking and payments sector. In this area, the EBA will continue to broaden and deepen its work to facilitate supervisory convergence in the implementation of the AI Act by financial institutions within EBA's scope of action and cooperation between competent authorities. This will be underpinned by actions following the mapping of the intersection between AI Act and sectoral requirements. These actions will include follow-up discussions on designated topics (such as explainability, bias and fairness, human oversight and incident reporting) and, guidance for industry and competent authorities. The EBA will continue to deepen its engagement with the AI Office and the AI Board.
40. In view of the growing application of these technologies in the EU banking and payments sector, including General Purpose AI (GPAI), the EBA will continue to monitor market developments and facilitate knowledge sharing between the industry and authorities and amongst authorities. The EBA will continue to assess opportunities and risks relating to these technologies with a view to taking forward such actions as are appropriate based on the outcome of this assessment.
41. EBA will continue to monitor market developments in other areas (e.g. crypto activities outside MiCA, value chain developments), to identify opportunities and risks and propose or take appropriate actions to address possible supervisory or regulatory issues. This includes continued actions to monitor tokenisation and DLT use in the EU's banking and payments sector and continued supervisory convergence actions regarding white labelling business models following the EBA's 2025 report on white labelling. The EBA will also take such actions as appropriate following the ESRB Recommendation (ESRB/2025/9) on third country multi-issuer stablecoin schemes.

KPIs

	Indicators (and type)	Weight	Short description	
A	Policy response and supervisory convergence in financial innovation (Results/impacts)	10%	Monitoring innovation, contributing to a common approach towards innovative financial activities, providing advice to co-legislators, through: i) dedicated contributions; ii) knowledge sharing (EBA structures, EFIF, SDFA, events); iii) training (SDFA).	
	Baseline	Target 2026	Target 2027	Target 2028
A	>1 initiative	2 initiatives 75 % reviewed materials for SDFA	3 initiatives 90 % reviewed materials for SDFA	> 3 initiatives 100 % reviewed materials for SDFA
Baseline: Findings of initiatives (i) to (iii) enable assessment of the need for policy responses and convergence measures. Baseline of minimum 1 initiative relies on practice in this field over the past years. Expansion of targets is based on technological uptake in banking and payment sector that requires more initiatives with a view to achieving common supervisory approaches.				

b) Consumer protection

42. The EBA will further monitor how technological innovation in the financial industry and supervisory practices affect consumers and market confidence. This will cover the impact of AI/ML mentioned above, with a focus on the use of AI systems for creditworthiness assessments for loans, which the AI Act identifies as a high risk use case, as well as the continued monitoring of AI/ML applications (including GPAI) in the EU banking and payments sector.

43. In relation to payment services, for the EBA to be able to deliver the mandates under PSD3/PSR/FIDA (Priority 1) and to do so in a way that protects consumers, the EBA will take a strategic approach to the monitoring of payment services in the EU. This will include monitoring the market itself – the providers operating within it, the services they offer, and the business models they operate— as well as the interaction of the various pieces of EU payments law. The aim is for the EBA to address gaps and inconsistencies proactively and, thus, contribute to the legislative requirements fulfilling their stated objectives of making payment services competitive, innovative, and convenient and secure for consumers to use.
44. The EBA will analyse consumer and conduct of business issues arising from crypto assets. It will work with NCAs to promote convergence in the transition phase leading to full application of the legislation, as well as with ESMA as many potential consumer protection issues are also relevant for investors.
45. In the area of depositor protection, and beyond the 11 mandates foreseen by the revised Deposit Guarantee Schemes Directive as part of the CMDI package (see Priority 1), the EBA will propose practical steps to ensure that its standards and guidelines are implemented consistently and ensure that customer deposits are safe in the event that their bank becomes insolvent.
46. The EBA will report on consumer trends in its biennial Consumer Trends Report, in addition to the annual Retail Risk Indicators included in the Risk Assessment Report (Priority 2). Both sources of information will influence the EBA's consumer protection priorities for the subsequent two years.
47. By 2026, the EBA will have transferred its AML/CFT powers, mandates, reporting infrastructure and expert knowledge to AMLA. This will help ensure that AMLA can start operating efficiently, and that the EU's fight against ML/TF is not disrupted. After the transfer, the EBA will establish a liaison function to facilitate cooperation and information exchanges with AMLA. This will serve to identify and tackle ML/TF risks at the intersection of payments and consumer protection law as well as through the supervision of prudential requirements.

KPIs

	Indicators (and type)	Weight	Short description	
A	Effective retail conduct supervision for consumer protection (Results / Impacts)	100%	(i) thematic reviews, (ii) peer reviews and (iii) actions in response to information EBA's Consumer Trend Reports and retail risk indicators; (iv) set up supervisory cooperation fora.	

	Baseline	Target 2026	Target 2027	Target 2028
A	>1 initiative	1 initiative	2 initiatives	> 1 initiative
	Baseline: Findings of initiatives (i) to (iv) allow to assess the effectiveness. Baseline of minimum 1 initiative is based on past experience. While expansion is difficult in the light of constrained resources, it is aimed to target two initiatives in 2027.			

2. HUMAN AND FINANCIAL RESOURCES – OUTLOOK 2026-2028

48. The outlook for human and financial resource needs for years 2026-2028 takes into consideration the expected evolution of tasks for the period as described earlier considering SDFA, DORA, MiCA, EMIR, the establishment of AMLA, and the proposal for the review of the Securitisation framework, as well as and the 2021-2027 multi-annual financial framework (MFF).

2.1. Overview of the past and current situation

Human resources

49. Excluding DORA and MiCA fee-funded positions which could not be filled ahead of the application of corresponding legislations, the EBA achieved a 97% occupancy rate for its 260 posts in 2024. In 2025, while the number of fee-funded positions (DORA, MiCA, EMIR) foreseen by the EU LFS increases by 10 bringing the total number of posts to 270, the number of EBA posts funded by EU and member states contributions is unchanged.

STAFF	2024 Year N-1			2025 Year N
	Authorised budget 2024	Actually filled as of 31/12/2024*	Occupancy rate +	Authorised staff
ESTABLISHMENT PLAN POSTS				
Administrators (AD)	151	147	97 %	151
Assistants (AST)**	11	10	91%	11
Assistants/Secretaries (AST/SC)	-	-	-	-
SDFA***	1	1	100%	1
MiCA****	20	1	(50%)	22
DORA*****	6	3	50%	8 (6 AD + 2 AST)
EMIR*****	-	-	-	3
TOTAL EP POSTS	189	162	86% (98%)	196
EXTERNAL STAFF	FTEs in the authorised budget	Actual FTEs as of 31/12/2024 N-1	Execution rate +	Authorised positions
Contract Agents (CA)	50	50	100 %	50
SDFA***	-	-	-	-
MiCA****	2	2	100 %	2
DORA*****	-	-	-	2
Seconded National Experts (SNE)*****	19	15	79 %	19
EMIR *****	-	-	-	1
TOTAL EXTERNAL STAFF	71	67	94 %	74
TOTAL STAFF	260	229	88% (97 %)	270

+ Percentages in brackets are showing the real occupancy rate without the MiCA/ DORA fee-funded posts that cannot be filled.

* Filled posts include offer letters accepted.

** In addition to the 11 structural AST posts, 2 AST4 posts for DORA (shown under DORA) to be yet recruited (1 AST4 is EU/NCA funded from 2024 until October 2025, then fee funded and 1 AST4 fee funded).

*** SDFA project funded by SG REFORM allows for:

1 TA/AD6 from SG REFORM for SDFA since 2023 and 1 CA/FG IV from SG REFORM for SDFA – the latter not shown above as per EC requirements. From 2026, as per the new SLA with SG REFORM: 2 CA/FG IV.

**** TA/AD MiCA posts for 2024: 20; for 2025:22. 2 CA/FG IV EU/NCA funded for indirect supervision tasks for MiCA.

***** A total of 18 ADs, 6 ASTs and 6 CA posts for DORA from 2025 pooled by ESAs, with 6 TA/ADs, 2 TA/ASTs, and 2 CA FG IV (o.w. 4 AD recruited in 2025, and, additionally, 2 AD offers are already accepted) at EBA.

***** 3 TA/AD posts and 1 SNE posts, all fee-funded from 2025 for EMIR IMM.

***** 4 cost free SNEs hosted at EBA at year-end 2025.

Financial resources

50. The EBA achieved a 99.9% execution of its 2024 budget. It managed to absorb a substantial EU salary indexation within the authorised budget. Based on the 2021-2027 MFF, the 2025 budget was adopted by the BoS budget on 19 December 2024 for a total amount of EUR 59,222,101 including contributions from the French government contribution, SG REFORM, and DORA fees to be levied. It was later amended to a total amount of EUR 60,195,049.

EXPENDITURE by budgetary title and chapter	Executed budget 2024	Budget 2025 ¹⁰
Title 1 Staff expenditure	36,709,753	40,379,850
11 Salaries and allowances	34,521,375	34,663,096
- of which establishment plan posts	25,709,400	27,870,487
- of which external staff	5,950,202	6,792,609
11.33 Employer's pension contribution	2,861,772	3,349,226
12 Expenditure relating to staff recruitment	324,779	418,155
13 Mission expenses	112,207	130,139
14 Socio-medical infrastructures	639,492	822,979
15 Training	455,832	451,531
16 External services	518,905	404,291
17 Receptions and events	137,163	140,433
Title 2 Infrastructure & operating expenditure	12,352,670	12,063,847
20 Rental of buildings and associated costs ¹¹	4,955,855	4,664,107
21 Information and communication technology	6,527,336	6,586,305
23 Current administrative expenditure	538,060	473,010
25 Information and publishing	331,419	340,425
Title 3 Operational expenditure	8,217,083	7,751,352
31 General operational expenditure	2,110,029	2,447,355
32 IT expenditure for operational purposes	6,107,055	5,303,997
TOTAL EXPENDITURE	57,279,506	60,195,049

Note: The 2024 figures i) include expenditure on projects and services (e.g. accounting, procurement, audit) partly recharged to other EU agencies, and expenditure using assigned revenue; ii) exclude the execution on commitments carried over from 2023.

2.2. Outlook for the years 2026-2028 (new and growth of existing tasks)

New tasks

51. Three new legislations applicable in 2025 bring new tasks to the EBA which will need to be fully operational from 2026 onwards: DORA, MiCA and EMIR. They are all fee-funded. Details on their general objectives can be found in Section 1 General context (New roles), and on their forward-looking resourcing in Section 2.5 Resource programming 2026-2028. Moreover, the EBA expects to contribute to the new EC's strategies on improving the competitiveness of the EU, simplify its regulation or make it more proportionate, and reduce reporting burden for the financial sector (see Section 1).

¹⁰ As per 2025 Amending budget no. 1 approved by BoS on 31/10/2025

¹¹ Includes expenditure funded by the French government contribution.

Growth of existing tasks

52. EBA's work will grow in eight main areas (see also Section 1 General context and their forward-looking resourcing in Section 2.5 Resource programming 2026-2028).

Simplification	[To be considered whether to include].
CRD/CRR	The banking package will remain the main driver of EBA's policy work until 2028 as a result of the c.140 mandates received for standards, guidelines and reports. Despite the sequencing facilitated by the EC and the experience and skills of the authority in this area, this will represent an unprecedented and very heavy workload over several years as no additional resources have been allocated.
CMDI	While ongoing negotiations on the CMDI and deposit insurance frameworks required support from the EBA the finalisation will require the authority to develop numerous regulatory and monitoring mandates.
Payment services and open finance	The situation is further exacerbated by the c.45 mandates expected to be received from the proposed PSD3, PSR, FIDA (Open Finance) and DGSD, most of which would have to be delivered between 2025 and 2027. So far, no additional resources have been foreseen for the EBA either. Catch-up will be necessary on several payment services and consumer-related mandated which had been streamlined, spaced out or postponed due to internal redeployments to support DORA and MiCA preparations.
ESG	<p>From a policy perspective, the EBA will continue developing the mandates requested from the EU legislators, and will monitor the need for potential updates and revisions given the dynamic developments of data, tools and methodologies to assess ESG risks.</p> <p>Moreover, the EBA will increasingly focus on monitoring, risk assessment and other analytical tasks (see also stress-testing). The EBA continue developing an ESG risk monitoring framework and will be providing regular updates on selected indicators to inform stakeholders on the characteristics, progress and risks of the environmental transition.</p>
Stress testing	<p>The EBA will continue working with its members on a strategy to provide a better cost-benefit for financial entities and supervisors when performing the EU-wide stress test required by its founding regulation. The general direction was endorsed by the BoS in 2025, where the future changes to the stress test were discussed. The objective is to streamline the exercise to reduce the burden on both supervisors and institutions, and to align it more closely with supervisory reporting. In addition, work will continue to combine top-down and bottom-up methodologies. Work is also undergoing to establish a collaborative platform to facilitate the joint development and use of top-down models.</p> <p>Moreover, building on the first climate EU-wide pilot exercise on climate risk¹² and the experience of the ESAs' one-off coordinated sectoral Fit for 55 climate scenario analysis, the EBA will continue developing a climate stress test module and aims to incorporate it in its regular stress-test exercise. Finally, there will be discussions about developing stress-testing for NBFI, which could benefit from the EBA expertise.</p>

¹² <https://www.eba.europa.eu/eba-publishes-results-eu-wide-pilot-exercise-climate-risk>, <https://www.eba.europa.eu/eba-publishes-results-eu-wide-pilot-exercise-climate-risk>

While stress-testing is one of the few forward-looking risk assessment approaches available, these various strands will require thorough and sizeable quantitative and data analytics skills. This will require an analysis of existing reporting with a view to complementing or rebalancing it.

Reporting	In the context of its integrated reporting initiative with ECB and competent authorities launched in 2024, the EBA will have to enter into the specifics of prudential and statistical reporting in order to build a common dictionary and then operationalise it. Moreover, the EC call for revisiting the relevance and granularity of harmonised reporting.
Regulatory and supervisory cooperation	New legislations and cross-cutting challenges (conduct, cyber, ESG, NBFIs...) require the EBA to intensify or establish relationships with other EU and international authorities and bodies in (e.g. ESAs' Joint Committee, ESRB, FSB, Basel Committee), including beyond the financial sector (e.g. NGFS, EFRAG, information security agencies). The EBA will support the EC in the context of the EU enlargement. The EU's association agreement with Andorra and San Marino also involves technical advice and new responsibilities
SDFA	The EC SG Reform-sponsored EU SDFA programme ¹³ started late 2022 and will continue its activities for another three years until end 2028 with a corresponding extension of the resources, under a service level agreement signed in October 2025. The purpose of the programme is to: i) train supervisors on technological innovation in financial activities; and ii) leverage supervisors' practical experience for EU policy development.
Ad hoc requests	The EBA has demonstrated its capability to adjust its work to deal with urgent requests by the co-legislators, which often have a strong quantitative component. It has responded to 4 calls for advice per year on average over the past five years, including unplanned ones. Other ad hoc requests take various forms, such as requests for technical advice, one-off analysis, data requests, or even requests for guidelines, as was the case for Guidelines on de-risking. As the new EC will define its priorities and strategies, the EBA expects that it will receive new such requests on top of those which are on-going or announced.

2.3. Strategy for efficiency gains

53. 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, 95% in 2023, and 93% in 2024), and is expected - based on provisional results - to be reach the self-imposed target of 90% in 2025.

Flexible organisation

54. **Portfolio of activities.** To facilitate internal synergies and cross-fertilisation, the EBA is constantly reviewing its portfolio of activities and has streamlined the total number of activities from 37 to 25 in

¹³ https://ec.europa.eu/info/sites/default/files/b5_-_digital_finance_academy.pdf.

2022, and to 19 since 2023. In continuation of its efforts to reap synergies and increase efficiency, the EBA has now further simplified and restructured its work in this document around seven overarching activities: 1) policy development; 2) supervisory convergence; 3) risk and financial stability analysis; 4) oversight and supervision; 5) data; 6) governance; and 7) operations, which better reflect the essence of the authority's efforts. 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 remains stable over the three years up to 2024 regarding the share of its administrative support and coordination (12.1%), operational (83.7%), neutral (4.2%) resources as per the EC methodology for Agency job screening.

55. **Living organisation.** Evolutions to the setup 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 reorganize the setup for equivalence and for Q&A in 2022. In 2023 and 2024, ca 25 FTEs were redeployed for DORA and MiCA policy and oversight preparatory work (including 36 mandates for technical standards, guidelines, advice...) 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). With the transfer of 8 posts to AMLA the dedicated AML unit was disbanded at the end of 2025 while remaining AML responsibility and expertise were integrated into existing structures.
56. **Planning and controlling.** The dynamic allocation of resources is facilitated by an activities-based tool developed in house with a rolling 3-year horizon: 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 improve the processes that ensure the *cost-efficiency* and the *reliability* of the sources and the versions of the EBA accountability documents and to better reflect on their audiences: rethinking *workflows* to improve results with *less work* and *more consistency* by using predefined building blocks to draft comparable or identical modules in the documents only once during the annual reporting cycle..
57. **Working arrangements and sustainability.** The EBA has introduced hybrid work, implementing EC's decision by analogy, in June 2022. It will continue its efforts towards creating flexible, digital, sustainable and efficient workplace. In line with its EMAS accreditation by French authorities in 2022, it has reduced its number of business travel by half compared with 2019 and only consumes renewable energy. It continuously invests in improving its environmental performance and reducing its carbon footprint (decarbonizing operations and implementing circular economy principles see also Annex VII).

Modern tools

58. **EBA's Horizon 2024-2029 Talent strategy.** It supports staff engagement, performance and development for the benefit of both staff (to keep a high level of qualification and motivation) and the organisation (to have the right skillsets and reach its objectives). Key achievements included: internal and external mobility (e.g. secondments/swaps with EU Institutions, bodies and other authorities, on-site inspections, that are expected to amount in 2026 to 13 cases, , vs 10 (actual cases) in 2025 and 5 in 2024); induction visits with EC; outreach (short-term expert onboarding, alumni network); staff care (e.g. wellbeing, D&I, Mental Health First aiders); leadership programme, competencies framework ,

Learning and Development strategy. Results look encouraging with staff satisfaction at 72% in the 2024 Staff Engagement Survey and a 85% participation (+7 and +14 ppt vs. 2022).

59. **EBA's 2026-2028 IT strategy.** Building on a strong 2020–2025 cycle—where the IAS recognised effective IT governance and a successful implementation of cloud strategy—our 2026–2028 IT Strategy focuses on four themes: Optimisation, Interoperability, Versatility (AI) and Resilience. IT work in recent years has led to the integration of new technologies, which are anticipated to provide sustained benefits. A Collaboration platform has reduced emails and supports integrated operating models (replacement of the extranet; DORA Oversight collaboration space for ca 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. An enterprise-level Identity and Access Management capability will provide a less-labour intensive a role-based access for both internals and externals in over 48 information systems and will ease workload and secure collections from banks (Pillar3 Data Hub) and issuers of crypto assets (MiCA). Key HR processes are being digitalised and a more interactive Single rulebook is envisaged. Going forward EBA's IT strategy commits on leveraging on EUCLID, DPM/DPM Studio, big-data and cloud investments, and expanding central services for NCAs and market entities. The roadmap matures the EBA Data Hub in lockstep with the Data Strategy, and delivers capabilities for PSD3/PSR/FIDA and EMIR IMMV, while upgrading cyber frameworks to meet the EU Cyber Regulation and addressing sovereignty/geopolitical risks.
60. **EBA's 2026-2028 Data strategy.** Building on the achievements of the 2021–2025 strategy, the new EBA's data strategy for the next years builds on the EBA's commitment to seeing data as a public good. The planned implementation and go-live of the EBA's Pillar 3 Data Hub, delivering on simplification and cost-reduction, alongside the establishment of public EDAP, EBA Registers, Master Data, and EBA Dashboards, are positioned as pivotal milestones. These initiatives are designed to ensure not just the efficiency, centralisation and accessibility of data, but also the reliability and transparency that stakeholders increasingly demand. By focusing on streamlining data standardisation and acquisition, solidifying in-house data access and analytical workflows, and fast-tracking data sharing to establish the EBA as a leading data hub, the strategy addresses both current challenges and future opportunities. These priorities are designed to reduce reporting costs, enhance data quality, foster innovation, and promote transparency and collaboration across the EU's supervisory community. Through the implementation of these actions, the EBA will not only strengthen its capacity for evidence-based supervision and policy development but also reinforce its leadership in regulatory data stewardship, ensuring that it remains agile, resilient, and responsive to the evolving needs of stakeholders and the broader financial ecosystem.

Collaborative approaches

61. **Competent authorities.** The EBA collaborate closely with competent authorities in the 27 member states and the EEA: ca 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 was operated in 2023-2024 to prepare for the new tasks.

62. **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). The EBA, EIOPA and ECB started in 2024 a *DPM Alliance* to jointly govern the future use, evolution and support of DPM2.0, for the benefit of competent authorities, Vendors, supervised entities. EBA and EIOPA have jointly developed *DPM Studio*, a digital regulatory reporting software product that allows them, the ECB and competent authorities to efficiently model reporting requirements in the insurance, pension fund and banking sectors using the DPM 2.0 standard. EBA and EIOPA will make the source code of DPM Studio available to interested NCAs for optimizing their own reporting activities. Finally, the EBA has started a cost-benefit assessment of least used harmonised reporting.
63. **DORA Joint Oversight Venture.** To tackle their new oversight responsibilities over CTPPs, the EBA is pooling resources with EIOPA and 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 reaps substantial synergies (no duplications, one reporting line, internalised coordination, joint recruitments, easier allocation of resources among the three ESAs over time).
64. **MiCA reporting.** EBA and competent authorities developed in 2025 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 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.
65. **Procurement.** The EBA systematically seeks to include other agencies in its procurement procedures. In 2024, the EBA was lead agency on six inter-institutional 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 inter-institutional procedures led by other EU entities, predominantly those run by the EC. Inter-institutional procurement is particularly strong with 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 table below.

Procurements	Lead	EBA	COM	Other agencies	Other	Total
Procurement procedures completed Q4/2024		6	12	9	1	25
Framework contracts		45	73	40	14	172

66. **ESAs.** The Joint Committee of the EBA, EIOPA and ESMA with the EC and the ESRB is a key forum to discuss common regulatory issues and agree joint initiatives. It allows to devise common approached for a number of cross-cutting areas, such as financial risk assessments, ESG, financial conglomerates. A recent achievements was the Fit-for-55 stress-test carried out under his aegis. It will prove instrumental in coming years to tackle topics like ESG again, NBFI, ESIU, and securitisation among others. The ESA senior management and experts also have an on-going dialogue to align on organisational issues of common interest.
67. **EU agencies.** The EBA actively contributes to the two key pillars of the EU Agencies Network multiannual strategy (1) EU Agencies as role models for administrative excellence (2) EUAN as a valued

institutional partner” by increasing efficiency through a better sharing of services, knowledge, best practice and pooling of tasks (e.g.: SLA with CPVO on procurement function).

68. **Accounting.** EBA has been sharing an accounting function with ESMA since 2021 to enhance the synergies between the two Paris-based authorities. The arrangement also include EIOPA’s accounting officer for reciprocal back up.
69. **Public cloud.** EBA and EIOPA have jointly migrated to Public Cloud in 2023-2024 using the EC’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 optimizing costs, security hardening, change orchestration with their common vendor, and sharing best practices.
70. **Security Officer.** EBA has a close collaboration with EIOPA and ESMA which have also migrated to Public Cloud, required similar Cloud Transformation programs, 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.
71. **Knowledge sharing.** The EBA’s FinTech Knowledge Hub brings gathers competent authorities 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 sharing 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.

2.4. Negative priorities/ decrease of existing tasks

Transfer of AML/CFT-related tasks and posts due to the establishment of AMLA

72. The EBA has transferred powers and mandates that relate directly to AML/CFT and eight posts that were allocated to it in the context of the 2020 amendments to the EBA’s founding regulation to AMLA on 31 December 2025. The EBA will retain the responsibility of cooperating with AMLA to ensure an appropriate tackling of ML/TF risk by the prudential supervision and contribute to the broader EU AML/CFT framework.
73. Beyond the transition phase, the EBA’s will support AMLA to provide continuity in the fight against financial crime and avoid disruptions for competent authorities and for financial institutions.

DORA policy development completed

74. In 2025, also with additional funding having been provided for the second half of 2024 and first half of 2025 to recruit DORA posts ahead of the collection of fees from CTPPs which are to be designated by end-2025, most of these initially redeployed resources will have returned to their primary areas of work

- where their expertise was urgently needed to work on mandates conveyed on the EBA, e.g. as part of the banking package or the revised payments services framework.

High flow rate of EBA mandates

75. The EBA's portfolio of tasks is composed of recurring or ongoing tasks as well as of one-off tasks. For the latter are subject to constant renewal as a result of the EU institutions new legislations to ensure that the legislative framework applicable to the bloc's financial sector is up-to-date and suited to meet new and unforeseen challenges, and to ensure alignment with globally adopted standards. This means that, even within its traditional areas of responsibilities, the EBA still faces a high turnover of specific mandates (often with new mandates replacing one completed previously). In addition, the EBA has a regulatory and supervisory convergence mandate and carries out peer-reviews and answers questions from the industry and supervisors. This leaves almost no room for own-initiative work.

2.5. Resource programme for the years 2026-2028

Human resources¹⁴

Number of staff requested

76. The outlook for human and financial resource needs for years 2026-2028 is based on the 2021-2027 multi-annual financial framework (MFF) and subsequent adjustments, including:

- A reduction of 8 of EBA's posts funded by the EU and member states contributions: from 2026, 4 TA/AD7 and 4 CA FG/IV are transferred to AMLA.
- Additional fee-funded posts provided by new legislations:
 - DORA. The LFS provides for a total of fee-funded posts of 18 ADs, 6 ASTs and 6 CA/FG IV in 2026 and forward, equally shared among the three ESA in a joint oversight venture, i.e. for the EBA: 6 TA/ADs; 2 TA/AST, and 2 CA/FG IV. To recruit the right level of oversight expertise, a full grade range would be needed: AD5, AD7, AD9, AD12, with 2 AST4 senior assistants. It is planned to recruit all posts by 2026.
 - MiCA. The LFS provides for a total of fee-funded posts of 20 TA/AD posts in 2026 and forward. Of the MiCA fee-funded posts, based on current estimates about future significant issuers of ART and EMT crypto assets, it is expected to recruit 2 posts in 2026, 5 in 2027 and 5 more in 2028, bringing the total to 12 posts by the end of that year.
 - EMIR. The LFS provides for 3 fee-funded TA posts and 1 fee-funded SNE in 2026 and forward.
 - ESIU. The LFS accompanying the proposal for review of the Securitisation framework provides for 3 TA/AD posts from 2027 onwards.

¹⁴ The content of this section has been updated to reflect the input to the Commission's BadgeBud system in January 2025, and further updated to reflect the position at the end of 2025. The subheadings in this section are as per the Agency Statement that is incorporated into the EU Draft Budget.

- SDFA is extended through a new SLA, with 2 CA/FG IV as from 2026 funded by SG REFORM (whereas previously 1 TA/AD6 and 1 CA/FG IV).

Overall staff request - set out in the initial draft SPD (but not granted)

77. As discussed in Sections 1 and 2, independently from the new responsibilities for which additional fee-funded resources have been provided, the EBA is facing a sharp increase in the number of its mandates, with a peak expected in 2027 and 2028. It will also need to adjust to new requirements like the Cyber regulation. This is notwithstanding any further requests from the new EC.
78. As in previous years, the EBA expects to maximise the use of its resources, through large-scale internal redeployments, systematic prioritisation, effort differentiation and simplification, and other efficiency measures described in Section 2.3, and being mindful of ensuring sustainable working conditions for its staff. Moreover, resources are not fully fungible. After having exhausted all possibilities for efficiency gains, a gap in available resources remains during the period 2026 to 2028.
79. In 2026, the EBA therefore requested 273 posts: 201 temporary agents (TAs) as part of the Establishment Plan, 52 contract agents (CAs) and 20 seconded national experts (SNEs). This included 6 new permanent posts and 5 new temporary posts for three years funded by EU contributions with matching NCA contributions.
80. With the reduction of posts by 8 due to AMLA, the request would amount to a temporary increase of posts by 3 for years 2026-2028 compared to the situation in 2025, and then to a decrease of posts by 2 after 2028.¹⁵ Given that some of the structural costs will be mutualised in the context of the new fee-funded posts, the EU and member states contribution would decrease in real terms and only increase by 1-2% annually in years 2026 to 2028, and decrease in nominal and real terms afterwards with the phasing out of the temporary 3-year posts.

Additional permanent posts requested – EU/NCA funded

Area of need	Number of posts / rationale	Job profiles/ grades
Cybersecurity	2 (1 TA/AD, 1 CA) to comply with Cyber regulation entered into force in 2024	- 1 AD6 Cybersecurity Expert - 1 CA/FG IV (IT security)
CRR III/CRD VI	1 (TA/AD) to deliver work on enlargement and broader international cooperation (third country equivalence assessment/ monitoring)	- 1 AD6 Policy Expert (EU regulatory equivalence)
Data for reporting, and stress testing	3 (2 TA/AD, 1 CA) with data analytical and quantitative skills – partly identified in previous SPD – to support EBAs and EC's reporting burden improvements and stress test	- 1 AD5 Banking Expert (Data) - 1 AD5 Banking Expert (Stress test) - 1 CA/FG IV (Data handling expert)
Total	6 FTEs permanently (4 TA/AD, 2 CA/FG IV)	

¹⁵ No additional HR resource is being requested despite the heavy burden that the DORA, MiCA and EMIR recruitments will represent for the HR function which is also implementing a 2024-2029 Talent strategy that was appreciated by the IAS. A benchmarking exercise of HR statutory staff posts vs Agency statutory staff posts revealed that the EBA HR unit would need one additional TA/AD6 post.

Additional temporary posts requested (for 3 years) – EU/NCA funded

Area of need	Number of posts / rationale	Job profiles/ grades
CRR III/CRD VI:	3 (TA/AD) to cover c. 140 new mandates (credit risk / securitisation & covered, market risk, CSDR, market access) – flagged in previous SPD	<ul style="list-style-type: none"> - 1 AD6 Policy Expert (Credit risk) - 1 AD5 Policy Expert (Securitisation / covered bonds) - 1 AD6 Policy Expert (Market access)
DGSD, PSD3/PSR/FIDA	2 (TA/AD) to deliver the c. 45 mandates proposed under the revised payment services framework (34 mandates) and the revised Deposit Guarantee Scheme Directive (11).	<ul style="list-style-type: none"> - 1 AD7 Policy Expert (Deposit Guarantee Schemes) - 1 AD7 Policy Expert (Payment Services)
Total	5 FTEs for 3 years (5 TA/AD)	

81. The request for posts was accompanied by a request for additional funding:

Funding

Area of need	Rationale
EMIR	Funding for early recruitment of 3 fee-funded posts (2TA/AD7, 1 TA/AD5 and 1 SNE) during preparations

82. Although the EBA considers this to be essential to ensure that it can deliver its tasks and activities as mandated by the co-legislators, the request for posts was not accepted by the EU institutions. It has been kept in the narrative of the final SPD for information but was not reflected in the relevant resource tables in the annexes. To the extent that the resource situation remains constrained, it is noted that the EBA considers re-iterating its request – albeit in an adjusted form – in the draft SPD 2027-2029.

Vacancy rate as of end 2024

83. The authorised establishment plan for 2024 included 23 fee-funded posts proposed for the EBA in the initial MiCA and DORA LFS and adopted by the Budgetary Authority in the General Budget 2022. Given that both legislations only enter into force in 2025, it was not possible for the EBA to levy fees in 2024 and recruit these posts. Excluding these posts, the end-2024 occupation rate was 98% for the 166 Temporary Agent posts in the establishment plan.

Standard abatement ('abattement forfaitaire')

84. For 2026, the EBA has budgeted for: 87 % occupancy rate (97 % budget impact for non-fee-funded TA positions – this takes into account an estimation for personal and other unpaid leaves); 99 % occupancy rate for CA positions, with 72.5 % only for SNE positions due to CAs' own resource issues.

Salary assumption for calculating salary line (% applied)

85. The cost of the TA & CA posts is based on the actual costs for existing staff at the end of 2024, adjusted with 2.0 % indexation annually.

Correction coefficient used

86. The correction coefficient applicable at the end of 2024 (114.2) is used for all years (2026-2028).

Exchange rate used

87. The exchange rates applied are those of 30 September 2024, in line with EC's Budget Circular, although the vast majority of EBA's financial transactions are denominated in euros.

Financial resources

88. The EBA's **revenue projections** stemming from the EU subsidy are set in the 2021-27 multi-annual Financial Framework (MFF), which also determines the NCA contributions (see calculation model in Annex III). The French government contribution as part of the French bid to host the EBA in Paris will expire by the end of 2027. Revenue from SG REFORM to fund the EBA costs of the Supervisory Digital Finance Academy (SDFA) will continue to 2028, albeit at a lower level. The fees line includes expected fee revenue for DORA from 2025, and for MiCA and EMIR from 2026.

89. As of 2027, the EU will provide additional EUR 263 000 for implementation of the new Regulation on European securitisation framework.

EBA revenues until 2028	2025	2026	2027	2028
EU subsidy	21 303 298	20 779 030	21 867 544	22 304 895
NCA contributions: EU	35 034 213	34 705 036	36 498 163	37 228 126
NCA contributions: EFTA	1 084 651	1 074 459	1 129 974	1 152 574
French government ¹⁶	575 000	1 150 000	550 000	-
SG REFORM	329 939	233 354	244 218	177 186
Fees	1 867 948	6 453 368	7 620 000	7 772 400
Total revenue	60 195 049	64 395 247	67 909 899	68 635 181

90. Due to the transfer of AMLA activities and eight posts to the newly created EU Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA), as well as non-approval of EBA's request for new posts, in 2026 the EU subsidy and the contribution from the competent authorities will decrease by 2.46% and 0.94% respectively. A lower decrease in NCA's contribution in 2026 is due to increase of EBA's pension costs that are covered by NCAs.

Share of the various revenue sources and annual increase	2025	2026	2027	2028
Share of EU subsidy / Total revenue	35%	32%	32%	32%
Share of NCA contributions (EU) / Total revenue	58%	54%	54%	54%
Share of NCA contributions (EFTA) / Total revenue	2%	2%	2%	2%
Share of Fees / Total revenue	3%	10%	11%	11%
Annual nominal increase/decrease of EU subsidy		-2.46%	5.24%	2.00%
Annual nominal increase/decrease of NCA contributions		-0.94%	5.17%	2.00%

¹⁶ The French government contribution for office cost is an external assigned revenue and therefore any unused funds at the year-end can be carried over to the next years. For 2026, the amount includes EUR 575 000 carried over from 2025.

EBA expenditures until 2028	Budget 2025	Budget 2026	Budget 2027	Budget 2028
Title 1 Staff expenditure	40 379 850	42 629 558	45 698 928	46 741 281
11 Salaries and allowances	34 663 096	36 207 712	38 904 240	39 855 958
- of which establishment plan posts	27 870 487	29 262 018	31 723 899	32 482 756
- of which external staff	6 792 609	6 945 694	7 180 341	7 373 202
11.33 Employer's pension contribution	3 349 226	4 023 193	4 110 280	4 197 367
12 Expenditure relating to staff recruitment	418 155	332 831	371 615	379 047
13 Mission expenses	130 139	136 330	151 297	150 000
14 Socio-medical infrastructure	822 979	889 752	856 774	873 909
15 Training	451 531	347 226	538 030	530 000
16 External services	404 291	526 841	619 228	610 000
17 Receptions and events	140 433	165 673	147 464	145 000
Title 2 Infrastructure & operating expenditure	12 063 847	14 074 057	14 634 506	14 618 363
20 Rental of buildings and associated costs	4 664 107	5 206 577	5 578 733	5 690 308
21 Information and communication technology	6 586 305	7 837 086	8 047 876	7 900 000
23 Current administrative expenditure	473 010	727 859	627 325	639 872
25 Information and publishing	340 425	302 534	380 572	388 183
Title 3 Operational expenditure	7 751 352	7 691 633	7 576 465	7 275 537
31 General operational expenditure	2 447 355	3 027 597	3 105 499	3 007 760
32 IT expenditure for operational purposes	5 303 997	4 664 036	4 470 966	4 267 777
TOTAL EXPENDITURE	60 195 049	64,395,247	67 909 899	68 635 181

Budget for year 2026

91. The EBA's assessment is that the resources envisaged by the MFF will make it challenging to deliver on its current and new activities in the years 2026-2028 despite continuous efforts at internal redeployments of resources, efficiency gains and synergies. The significant increase in costs in recent years (inflation and related EU salary indexation) was not matched by an equivalent increase in funding: in particular, the average costs of temporary and contract agents will continue to put pressure on the total budget as the EU subsidy has not risen in line with the increase of the costs since 2023.
92. For DORA oversight, the ESAs have decided to work as "one team" and pull posts in a joint oversight venture reporting to the three ESAs' executive directors. Given the complexity of the task and a tight market for ICT experts, an upgrade of the grade structure foreseen in the DORA Legislative Financial Statement for the establishment plan is necessary, and the ESAs will be assessing where the number of posts is sufficient. The above figures may be reassessed in case of further inflation/indexation.

Financial resources – EBA request¹⁷

Title 1 – EU and NCA

93. Complementing the assumptions listed in the Human resources – EBA request section above, the following additional assumptions drive the Title 1 expenditure that is not funded by fees:

1. Employer's pension contribution percentage: the double of the employee's contribution % (assumed = 13.6 % for 2026), of which 60 % of the employer's cost goes through the EBA budget and is funded fully by the NCA contributions;
2. Average cost of EUR 83 000 per SNE;
3. Given the success of the trainee scheme to date, the EBA will continue to aim to have ca 30 trainees, at an average cost of EUR 25 500 per trainee;
4. Recruitment costs include provision for one vacancy procedure requiring management assessment centre, external participants on recruitment panels, and advertising in paid media;
5. The budget includes 314 KEUR for taking up duty and removal allowances;
6. EBA covers the cost of staff annual medical visits and pre-employment medicals, either via a framework contract with a Paris-based provider or via Commission medical services. The EBA offers flu vaccination in Paris via the framework contract;
7. With staffing increases, the EBA also sees increases in the number of children of EBA staff, which drives an increase in the education contribution cost at all levels: nursery, primary, and secondary;
8. Administrative missions cover missions for training and other purposes not linked to core budget, and includes travel insurance and travel risk management services;
9. EBA will continue to cover the cost of admission to the Europlaza canteen, and to offer a home office contribution to staff for setting up their teleworking station;
10. Regarding external services, the EBA plans to undertake another staff engagement survey in 2026 and to require external services to assist with the implementation of the IAS action plan. Interim staff and staff exchange costs are budgeted at a higher level than in 2025;
11. EBA funds staff and department/unit team-building events, and staff committee costs at a similar level as in 2025.

94. The early recruitment of the EMIR fee-funded posts (2 TA/AD7, 1 TA/AD5 and 1 SNE) during the preparatory period will be funded by additional one-off EU/NCA contributions, similar to what was done for DORA in 2024 and 2025.

Title 1 - fees

95. Fee-funded staff costs include the cost of staff working directly and an allocation of the cost of other staff indirectly supporting fee-funded staff and activities. For fee-funded staff, the full amount of the employer's contribution to pension goes through the EBA budget and is charged with the fees.

¹⁷ The content of this section has been updated to reflect the input to the Commission's BadgeBud system in January 2025, and further updated to reflect the position at the end of 2025. The subheadings in this section are as per the Agency Statement that is incorporated into the EU Draft Budget.

Title 2 – EU and NCA

96. Building lease costs contractually increase every year based on French indexation (ILAT¹⁸). In 2024, the ILAT rate was 4.3 %. For 2026, EBA is budgeting for 2% ILAT. The annual French government's contribution of EUR 575,000 will be put towards the lease costs. As an external assigned revenue, any remaining balance of this contribution can be carried forward to the next budget years. Building running costs are being budgeted to increase at 2 % per annum.
97. The EBA lease of office space in the Europlaza building at La Défense comes to an end in May 2028. The EBA will be working on procuring the subsequent lease with the objective of accommodating the resulting costs (including those of a possible move of offices) within the existing appropriations.
98. Costs for IT hardware and software are being budgeted at a similar level to 2025. IT services cost increases are driven by the costs for the implementation of updated Commission systems for HR (SYSPER), Missions (MIPS+), Finance (SUMMA), and the new documents and records management system (EDRMS), and by increasing cyber security requirements. EBA will continue to ensure that cloud costs remain in line with projections.
99. Legal expenditures are expected to increase in 2026 due to a) additional support required in respect to new office lease procurement procedure and b) potential litigation costs in respect to oversight and supervision activities.

Title 2 – fees

100. Title 2 costs funded by fees are indirect costs driven for the most part by the number of FTE projected to work directly on fee-funded activities in 2026.

Title 3 – EU and NCA

101. The Chapter 31 general operating costs budget includes the costs of: developing and running training for external entities; EBA-hosted meetings (BoS and MB, Banking Stakeholder Group, standing committees, sub-groups and working groups); and EBA business travel. The EBA is budgeting for a similar level of physical meetings and travel as in 2025, reduced by the cost of the Joint Consumer Protection Day for which EBA was responsible in 2024.
102. Chapter 31 includes the cost of translations of guidelines, which for the EBA has always been a significant cost, and is expected to run at a similar level to 2024. Chapter 31 also includes subscriptions to data services - such as data on crypto-assets, ESG, and climate risk data - as well as ad-hoc data required for some consumer initiatives and FinTech work, and capital market data. Operational consulting is included in this chapter, and in 2026 is expected to include work on Pillar 3 data hub, data curation and remediation (for DORA), SupTech work for MiCA, and integrated reporting.
103. The Chapter 32 information technology (IT) budget includes amounts for ongoing support and maintenance work on existing systems, and implementation of additional capabilities/new initiatives. The most significant element of expenditure will continue to be EUCLID, both maintenance and new

¹⁸ *Indice des loyers des activités tertiaires (ILAT)*

initiatives: driven by the mandates of PSD3/PSR/FIDA, continuation of Pillar 3 hub work and the enhancement and operational support of DORA and MiCA systems. Work will also continue on identity management, replacement of EBA notification systems (eGate), transfer of EURECA to AMLA, and enhancements on workplace solutions such as the colleges platform.

Title 3 – fees

104. Title 3 costs funded by fees are primarily fee-funded direct costs (missions, meetings, IT systems maintenance). May also include consultancy and data services.

Ad hoc grants and delegation agreements

105. In 2025, the EBA signed a new SLA with SG REFORM whereby the EBA provides services to the EU Supervisory Digital Finance Academy over a period of four years (mid-2025 to mid-2028) and SG REFORM funds two CA posts for three years, as well as other costs arising from the EBA's support to the EU SDFA.

SECTION III - ANNUAL WORK PROGRAMME 2026

1. OVERVIEW AND SUMMARY

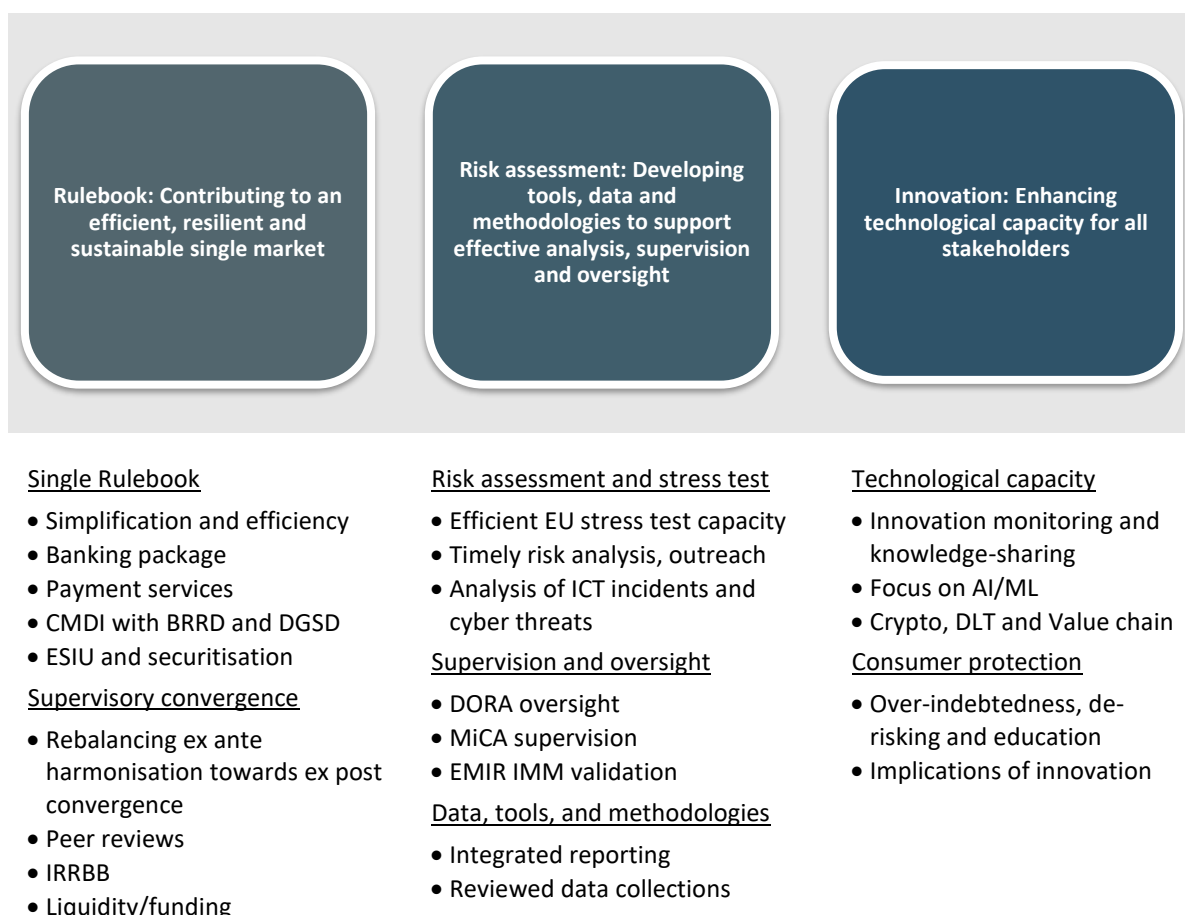
106. This section sets out the work programme of the EBA (WP) for 2026 in more detail. The authority's tasks arise both from its founding regulation and from specific EU legislations. A first version of this WP was approved by the BoS in January 2025 as part of the Authority's draft single programming document (SPD) for years 2026-2028 which sets its priorities and resources for this entire period. It has been refined to reflect developments since then, the European Commission's (EC) opinion on the draft SPD, and guidance received from EBA's advisory committee on proportionality (ACP) in June 2025.
107. The year 2026 will mark an important milestone in EBA's existence. In addition to the continuation of its traditional policy development, convergence and risk analysis work, the Authority will ramp up oversight and supervisory functions arising from new responsibilities over critical third-party providers (DORA), issuers of crypto assets (MiCA), and the use of initial margin models (EMIR). On the other hand, the AML/CFT responsibilities that it has exerted since 2020 will have been transferred to AMLA.
108. Against that background, the EBA's work in 2026 will be driven by three priorities: i) developing a rulebook which contributes to an efficient, resilient and sustainable single market; ii) performing risk assessments with tools, data and methodologies which support effective analysis, supervision and oversight; iii) tackling innovation to enhance the technological capacity of all stakeholders.
109. In line with the outcome of BoS discussions in 2025, the EBA's will discharge its duties with a view to strengthening the simplicity and efficiency of the regulatory and supervisory framework for banks and financial entities in the EU. This will entail specific initiatives in the areas of Level 2 and 3 regulatory products, reporting cost for financial firms, the Authority's working arrangements, as well as its contribution to the overall EU prudential regulatory framework.¹⁹
110. In the continuation of its continuous efforts to reap synergies and increase efficiency, the EBA will structure its work around seven overarching activities: 1) policy development; 2) supervisory convergence; 3) risk and financial stability analysis; 4) oversight and supervision; 5) data; 6) governance; and 7) operations. The EBA's WP remains of course flexible and can be adjusted to evolving circumstances.
111. Section 2 discusses the EBA's priorities and areas of focus in 2026. Section 3 provides a detailed list of deliverables for each of the seven main activities with an indication of expected timing for delivery. Each activity is linked to the overarching priorities, with objectives, descriptions, and a list of main outputs.

¹⁹ This is in line with the EBA's Report on the efficiency of the regulatory and supervisory framework developed by Task Force on Efficiency (TFE). Areas of work, mandates or tasks that are impacted or addressed by the recommendations are identified with reference to the TFE.

2. 2026 PRIORITIES AND AREAS OF FOCUS

112. In 2026, the EBA will start executing on its priorities for the period 2026-2028 (see Single Programming document 2026-2028). The year will be marked in the history of the authority with the taking up of oversight and supervisory functions arising from new responsibilities over critical third-party providers (DORA), issuers of crypto assets (MiCA), and the use of initial margin models (EMIR). This is in addition to the continuation of its traditional policy development and convergence work - albeit with increased focus on the implementation of these new rules -, as well as tackle new challenges arising from the risks and vulnerabilities outlook (geopolitical and trade developments, transformation of the financial sector). Importantly, it will support the EU co-legislators' priorities and strategies for the financial sector, especially calls for strengthening the simplification and the efficiency of the regulatory and supervisory framework for banks and financial entities in the EU.

EBA's priorities and areas of focus in 2026:



Priority 1 – Rulebook: Contributing to an efficient, resilient and sustainable single market

113. This priority relates to the EBA's core responsibilities of (a) developing a single rule book and (b) ensuring its consistent implementation for the activities and supervision of the financial entities in its remit, to contribute to an efficient, resilient and sustainable single market in financial services. After more than a decade of ex ante harmonisation work, more importance should be given to ex post

convergence (TFE recommendation 19 (short-term, EBA with involvement of other stakeholders). The authority will also strive to ensure the right balance for the comprehensiveness, proportionality and simplicity of the rules, having in mind the EU legislators' objective of reducing reporting cost and the need to facilitate the use of the rulebook.

a) A single rulebook that is fit for purpose

Simplification and efficiency (see also priority 2)

114. To contribute to the simplification and increased efficiency of the prudential regulatory framework, the EBA is making proposals to reduce the complexity of the rules (design), strengthen the coordination of public sector action (execution), and check the ultimate impact of the framework (calibration). Such improvements should be envisaged in a way that preserves the resilience of the EU financial system and its international credibility by remaining committed to implement the Basel standards, enhances the ability of supervised entities to reap the benefits of the single market, and maintain a level playing field in the EU with appropriate proportionality adjustments and avoiding fragmentation. The EBA's work programme includes references to the TFE recommendations and workplan which are covered in more detail in a separate publication (with the overview included at the end of this part).
115. To that end, the EBA has defined a methodology for assessing the materiality and priority of L2 and L3 mandates and which it has applied to all current and upcoming mandates (and led to defining the delivery quarter and to identifying the "deprioritised tasks" highlighted in Section 2 of the WP). This methodology should also serve for advising on ongoing and forthcoming legislative discussions and to support a review of the single rulebook, starting with the most material building blocks (e.g. credit risk, governance and remuneration, ESG, supervisory process – including stress tests, resolution). (TFE recommendation 1 (immediate, EBA lead) and 2 (short-term, EBA lead)).
116. As also recommended by the EBA' Advisory Committee on Proportionality (ACP), the EBA will propose to further increase proportionality in its review of the SREP Guidelines due for completion in 2026.
117. Finally, drawing on BoS discussions in 2025, it will work with CAs and co-legislators on a contribution to a holistic review of the existing EU regulatory and supervisory framework for banks. This may include reflections on simplifying the stacking orders of own funds, leverage and MREL/TLAC applicable to banks, as a follow-up to its 2024 report on the matter, and to better recognise consolidated risk management and supervision in the banking union.²⁰ (TFE recommendation 9 (short term, possibly long term, EBA lead)). It may also consider introducing a more systematic application of simpler rules for the SNCI category while maintaining a single bank regime and exploring the expansion of the category; the set up of supervisory platforms bringing authorities from various horizons together; the development of common IT platforms (one stop shops) for information sharing and supervisory coordination (TFE recommendations 10, 14 and 15 (short term, EBA with involvement of other stakeholders)).

²⁰ www.eba.europa.eu/publications-and-media/press-releases/eba-reflects-eu-stacking-orders-and-provides-insight-eu-institutions-management-buffers

Banking package

118. The EBA will be continuing its work on the EU Banking Package, moving towards the completion of phase 2 mandates (see EBA roadmap²¹) and consulting or finalising mandates in phases 3 and 4.
119. A significant part of these mandates relates to the determination of capital requirements, in particular in the areas of credit risk and operational risk, and to a lesser extent CVA and trading book exposures. On operational risk, the deliverables related to operational risk management and governance on loss databases will be prioritised. On credit risk, the EBA will pursue its work on the 25 products included in phases 2 to 4, focussing on those related to IRB, specialised lending. It will also initiate work on a number of “review” mandates, including the prudential treatment of leasing exposures. As for market risk, the EBA has paused work in line with the EC decision to postpone the implementation of FRTB in EU. However, the RTS on Structural FX and the RTS on prudent valuation are expected to be completed in 2026. Furthermore, there are several products related to CVA, most notably the RTS on proxy spread, where the EBA has initiated work.
120. Significant changes were introduced in the CRR in relation to entities accessing the EU market through third-country branches (TCB). In this area, the EBA will deliver on the phase 2 and 3 mandates, including the RTS on arrangements of TCBs, the Guidelines on instruments for the TCB capital endowment ITS and on the minimum common reporting of TCBs. The EBA will also deliver Guidelines on ancillary services undertakings, which are relevant for the proper identification of the regulatory perimeter of consolidation.
121. The standards concerning new supervisory tools for the prudential assessment of material changes in credit institutions, financial holding institutions and mixed financial holding institutions, such as acquisition of material holdings and mergers, will also be finalised. Such mandates are instrumental to levelling the EU playing field with regards to the prudential assessments by competent authorities in this regard.
122. In the area of governance, the relevant GLs will be amended to reinforce banks’ sound governance arrangements at the top managerial level of institutions - including the need to map the duties of each individual from the management body - and with regard to ESG risks.
123. The EBA also stands ready to undertake on follow-up work to the IFR/IFD review, as and when requested.

Payment services

124. Based on current discussions, the EBA may be conferred more than 50 mandates and tasks by the forthcoming revised Payment Services Directive (PSD3), Payment Services Regulation (PSR), and Financial Data Access Act (FIDA). These mandates would cover the entire spectrum of risk mitigation, including prudential, authorisation, payments security, and consumer protection. They would also support the many other objectives of these laws, such as enhancing competition, facilitating innovation, and deepening the single EU market. Were these mandates to be confirmed, the EBA will develop and start executing a roadmap to fulfil them efficiently and reduce compliance burden for the industry (due

²¹ See [The EBA publishes roadmap on the implementation of the EU Banking Package | European Banking Authority](#)

to the interplay of half a dozen pieces of EU payments law) and to provide utmost transparency to the industry. As part of this the EBA plans to identify potential synergies between regulatory requirements, engage proactively with the industry, and publish regular observations about the evolution of the EU payments market.

CMDI with BRRD and DGSD

125. Following the CMDI political agreement and its expected close adoption, the EBA will need to prioritise the mandates with the shortest deadlines (12 months) while also commencing work on mandates with longer timelines (18-24 months).
126. Regarding BRRD, consistently with the scope of the related new mandates, the EBA will focus on setting new regulatory requirements in relation to limited specifications in the area of early intervention measures and MREL. Work on the CMDI mandates will primarily consist in developing monitoring reports on various aspects including resolvability assessment, protection of retail investors and state of play of implementation of resolution tools and powers in resolution.
127. As part of the CMDI package, the EBA may also receive up to a dozen mandates under the revised Deposit Guarantee Schemes Directive (DGSD2). If confirmed, the EBA will start with the Technical Standards on the depositor information sheet, on the information exchange between DGSs and client funds, as well as the Guidelines on the calculation of DGS contributions and on irrevocable payment commitments. Like in previous years, the EBA will continue to publish annual data on covered deposits.

ESIU and securitisation

128. The EBA is actively following the legislative process on the revision of the overall securitisation framework, including changes to the Securitisation Regulation (SECR) and CRR, and will be ready to initiate work in 2026, as warranted. It will also prepare various monitoring reports, including on the treatment of synthetic securitisations.

b) Targeted efforts to enhance supervisory convergence

129. The EBA will continue to enhance its approach to supervisory convergence. In the wake of the more comprehensive report on its actions in this area in 2025, it will further integrate the various dimensions of its efforts (peer reviews, monitoring, benchmarking, Q&As etc.) and increase their respective importance vis a vis ex ante harmonisation work. This should draw on the mandates given to its working structures. The EBA will also support convergence work of EU authorities in the areas of DORA and MiCA. (TFE recommendation 17 (short term, EBA lead)).

Peer reviews and supervisory independence assessment

130. The EBA will further expand its peer reviews, to assess and further strengthen consistency in supervisory outcomes. It expects to publish peer review reports on the supervision of Pillar 3 transparency requirements under CRR (to support the implementation of the Pillar 3 data hub), and follow-up reports related to peer reviews on the supervision of creditors' treatment of mortgage borrowers in arrears and on the definition of default. Reflecting its focus on digital finance and the

implementation of MiCA, the EBA plans to review how MiCA's White Paper requirements are supervised, as well as to carry out its first peer review of resolution authorities.

131. Together with ESMA and EIOPA, the Authority will follow up on the 2023 joint criteria on supervisory independence and assess a sample of competent authorities' processes and practices in this area.

IRRBB

132. In line with the Union-wide supervisory priorities for 2026 (see Annex III), the EBA will continue to monitor the implementation of existing regulatory products and follow up on the impact of interest rates evolutions on IRRBB management and the modelling underlying assumptions. In this context, it will further discuss with stakeholders and continue to implement medium- and long-term actions as communicated in its heatmap on IRRBB published end-2023.

Liquidity/funding

133. The EBA will scrutinise how institutions and CAs implement the LCR and NSFR (e.g. in terms of notifications and the use of national options and discretions) monitoring their practical implementation and providing guidance as necessary. This will encompass lessons from the 2023 turmoil, and new developments in funding models of banks (digitalisation). The EBA will also review how banks and supervisors follow up on the recommendations of its monitoring reports.

Priority 2 – Risk assessment: Developing capacity for effective analysis, supervision and oversight

134. This priority relates to (a) the EBA's responsibility of assessing risks and vulnerabilities in the EU/EEA banking and financial sector through regular and ad hoc analyses, (b) its new roles as the lead overseer of critical ICT-third party service providers, supervisor of significant asset-referenced and e-money token issuers and validator of certain EMIR IMM models, and (c) its need for reliable and adequate data supporting efficient methodologies and tools as an enabler of (a) and (b).

a) Regular and ad hoc EU-wide risk assessments

Efficient EU stress test capacity (incl. climate, NBFi)

135. The preparations for the 2027 EU-wide stress test will focus on streamlining the bottom-up methodology by reducing the cost of data requests and aligning them with supervisory reporting. (TFE recommendations 2.4 and 5 (short term, EBA with involvement of other stakeholders)). At the same time, the supervisory reporting will be adjusted to include data for developing top-down stress testing models. After receiving the first data the calibration of such models will start with the primary focus of developing credit risk models that could provide value added to the EU-wide stress test.
136. Additional elements will also be considered for the 2027 EU-wide stress test. This will include climate risks, starting with the inclusion of a separate module on targeted portfolios focussing on transitional and physical risks. This may also include NBFIs, drawing on the EBA's expanding work on NBFIs and their interlinkages with the rest of the financial system.

Timely risk analysis, outreach

137. The EBA will be assessing the impact of rising geopolitical and trade risks on credit, market, liquidity and operational risks. The prominence of the latter has notably increased with the global geopolitical tensions, while downside credit risks for vulnerable households and corporates remain high also due to uncertain global trade developments. Climate-related risks, and the interconnectedness of the banking sector with the NBFIs sector will also require close monitoring.
138. The EBA's reports and dashboards (e.g. the regular EBA Risk Assessment reports) will help support outreach initiatives to enrich and share the EBA's assessments with stakeholders.

Analysis of major ICT-related incidents and cyber threats

139. Based on reports received on major ICT incidents, the EBA, together with the other ESAs, will prepare the ESAs Annual Report on ICT incidents and analyse the ICT threat landscape. It will contribute to the operationalisation of the pan-European systemic cyber incident communication and coordination framework ("EU-SCICF"), to facilitate a coordinated response in case of systemic cyber incidents.

b) Effective oversight and supervision (DORA, MiCA, EMIR)

DORA Joint oversight

140. In 2026, the EBA, ESMA and EIOPA will ramp up their joint oversight of critical third-party providers (CTPPs) to be designated in 2025. This will include (i) engaging with CTPPs on their governance, strategy, organisation, and on the ICT services they provide to EU financial entities (ii) performing horizontal thematic reviews of the contracts and service level agreements between the CTPPs and EU financial entities, and (iii) carrying out thematic deep-dives or onsite inspections on specific high-risk areas of CTPPs. This will entail close cooperation with relevant EU and non-EU authorities.
141. The ESAs will also perform horizontal oversight activities, such as the risk assessment and oversight planning for 2027 and the annual third-party provider criticality assessment.

MiCA supervision

142. In 2026 the EBA will perform the second annual significance assessment of EMTs and ARTs issued by authorised issuers in the EU, with special consideration for the case of issuers with a presence in a third country. Based on supervisory methodologies and arrangements, any potential direct supervisory activity on significant tokens in 2026, will be performed following a supervisory plan developed in 2025. Close cooperation with CA and third country supervisors will be further reinforced in 2026 in the context of an expected growing crypto market and, in particular, direct supervisory needs.

EMIR IMM validation

143. The EBA will establish a central validation function for Initial Margin (IM) models in 2026. It plans to publicly announce the start of its first ISDA SIMM model validation in Q1 2026 and to onboard the entities using ISDA SIMM in the EBA IT system in the first half of 2026, hence allowing them to submit

their applications by August 2026. EMIR also mandates the EBA to develop an RTS and a guideline dealing with the authorisation process of IM model by CAs. The RTS objective is to define the tools and methods for assessing whether the users of IM model comply with EMIR and the substantive requirements.

c) Adequate data, tools and methodologies

Integrated reporting

144. As recommended by the BoS and the ACP, the EBA will intensify its work to develop an efficient supervisory and resolution reporting framework applicable to all EU institutions that is fully harmonised, integrated and proportionate and, at the same time, fit for the purpose to provide the data that authorities need to fulfil their mandates. It plans to revise the different components of its reporting frameworks with the view to reduce reporting costs by 25%. The EBA will do this by reducing and simplifying the reporting, reducing data redundancies and disposing of those data requirements that are not so much used (TFE recommendation 5 (short-term, EBA with involvement of other stakeholders)). It will improve change management of reporting to decrease frequency and to increase predictability of changes to reporting requirements (TFE recommendation 8 (short-term, EBA lead). It intends to increase coordination and the transparency of existing data and reporting requests from authorities by developing a public EU-wide data request repository, assess the usability of exiting requirements and take into account the cost from any additional reporting requests (TFE recommendations 6 and 7 (short-term, EBA with involvement of other stakeholders)).
145. The scope of this action will extend beyond the EBA reporting framework, and the EBA will work with competent and resolution authorities to review also the national and jurisdictional reporting requirements to identify and remove parallel reporting, data overlaps and data inefficiencies to deliver on the target to reduce the cost of reporting by 25% (TFE recommendation 5 (short term, EBA with involvement of other stakeholders)).
146. Moreover, the EBA will continue the work with the ECB under the auspices of the Joint Banking Reporting Committee towards an integrated and consistent reporting system in the banking sector for collecting statistical, resolution and prudential data to further increase standardisation, by way of semantic integration, common definitions and avoidance of redundancies (TFE recommendation 4 is also relevant here (albeit long-term, EBA with involvement of other stakeholders)). In 2026 the JBRC will develop integrated glossaries for several reporting topics paving way for a common data dictionary.
147. In parallel, the EBA will start using the upgraded data dictionary (EBA-EIOPA Data Point Model 2.0) and related IT tools (DPM Studio) and further enhance them to ensure the coverage of statistical needs, the management of a semantically integrated glossary used by different authorities and the relevant regulatory content (instructions, legal references etc.). The common data dictionary will be the spine of an integrated reporting framework for all actors involved in the banking sector as part of the search for efficiency in the reporting chain.

Reviewed data collections

148. The EBA's EUCLID platform will be leveraged for collecting new data sets, such as Pillar 3 disclosure, reporting requested by the new Instant Payments Regulation (IPR) reporting from new entities enter the Authority's perimeter (DORA, MiCA), evolving ESG data and metrics. In particular, it will offer a common infrastructure for the EBA and CAs involved in the supervision of MiCA ARTs and EMTs.
149. The EBA's data strategy for 2026-2028 - under preparation - will aim to further align the Authority's data infrastructure and analytical capabilities with the evolving needs of its risk assessment, stress testing, and supervisory tasks, and its ICT Strategy. It should expand the accessibility of regulatory data to analysts and researchers, support market discipline and policy development, and facilitate data sharing amongst authorities to avoid duplicated data requests (TFE recommendation 6 and 7 (short-term, EBA lead with involvement of other stakeholders)). The EBA also plans to enhance its data offerings and analytical services by leveraging recent innovations and AI, ensuring high standards of timeliness and reliability.

Priority 3 – Innovation: Enhancing technological capacity for all stakeholders

150. The EBA's third priority is to (a) enhance technological capacity within the financial sector with (b) special attention paid to consumer protection.

a) Enhancing technological capacity

Innovation monitoring and knowledge-sharing

151. In 2026, the EBA will continue to monitor financial innovation and identify areas where a regulatory or supervisory response may be needed, contributing, as appropriate to EC initiatives (including in the context of AI Act implementation and the wider Digital Finance Strategy). The EBA will focus its thematic work in three priority areas: (i) artificial intelligence (AI) and machine learning (ML); (ii) crypto-assets, distributed ledger technology (DLT) and the digital euro; (iii) value chain evolution.
152. In 2026, the EBA will chair the European Forum for Innovation Facilitators (EFIF). The Authority will focus on enhancing discussions on business models and technological innovation of a cross-sectoral relevance (e.g. embedded finance), to deepen supervisory understanding of opportunities, challenges and risks, and strengthen convergence in supervisory expectations. Additionally, the EBA, EIOPA, ESMA, and the EC will continue to support the EC Supervisory Digital Finance Academy (SDFA) which supports the build-up of EU supervisory capacity in innovative digital finance.

Focus on artificial intelligence and machine learning

153. The EBA will contribute to the implementation of the AI Act in the EU banking and payments sector: (i) taking forward follow up actions identified in the 2025 exercise to map AI Act requirements against sectoral measures; and (ii) continuing to assess AI Act implications. This will be done in close cooperation with the EC and its AI Office and other ESAs.
154. The EBA will deepen its analysis of AI market trends, related risks and opportunities looking into general purpose AI (GPAI) use cases, methodologies to assess interdependencies in the provision of AI

applications by third parties to the EU banking/payments sector to identify any follow-up actions as may be appropriate. This could support CAs' own analyses and work in this area.

Crypto, DLT and Value chain evolutions

155. Following the joint EBA-ESMA 2025 report on developments in crypto-asset markets and their analysis of DLT use cases, the EBA will monitor the use of DeFi as a means for consumers to access EMTs and ARTs and the wider use of commercial bank-issued tokens as settlement assets. It may follow up on the conclusions of the EBA's 2025 report on white labelling in promoting common understanding among NCAs about potential opportunities and risks, the regulatory qualification of the arrangements between the parties, and consumer-facing disclosures. It will monitor the role of BigTech in EU finance.

b) Consumer protection

Over-indebtedness, de-risking and education

156. Following-up on consumer issues of over-indebtedness and de-risking identified in its 2024/2025 Consumer Trends Report, the EBA will assess legal entities' compliance with the EU Credit Servicers Directive (taking into account different sizes of national markets), develop an action plan for 2027 for a consistent implementation of, and industry compliance with, the revised Consumer Credit Directive (CCD2), and assess legal entities' compliance with the EBA Guidelines on de-risking to provide evidence-based input for the Guidelines on the same issue that EBA and AMLA should develop jointly by 2027.

Cross-border supervision, retail risk indicators, and payment fraud

157. Following a Report of the Joint Committee of the ESAs on cross border supervision of retail financial services (JC/2019-22), the EBA will assess progress in the banking sector and the need for any follow-up actions. It will update its repository of national financial education initiatives and its annual retail risk indicators.
158. The EBA will publish annual updates to its retail risk indicators (in the Risk Assessment Report – RAR), extend or amend their composition based on data availability and avoiding adding reporting cost. It will use these indicators, alongside other input, to shape its consumer protection priorities for the subsequent years.
159. Finally, in the area of payment services, the EBA will monitor and publish data on payment fraud, to assess the extent to which EBA security requirements support the desired fraud reduction objective, and to provide the data needed for a convergent and successful fight against fraud across the EU.

Implications of innovation

160. The EBA will continue its work to facilitate consumers' understanding of opportunities and risks when using digital interfaces to access financial products and services. In particular, the EBA will carry out follow-up actions to the 2025 report on white labelling including work to foster greater consistency and clarity in consumer-facing disclosure to ensure consumers are aware of with whom they are contracting when engaging products and services in this manner.

Overview of TFE recommendations

#	Recommendation	Horizon	Lead	Impact on Level 1
Production of regulatory mandates				
1	Set up a methodology to assess the materiality of L2 mandates	Immediate	EBA	Possible
2	Review of the single rulebook by building blocks			
2.1	Credit risk	Immediate	EBA	Expected
2.2	Governance and remuneration	ST	EBA	Possible
2.3	ESG	ST/LT	EBA	Not expected
2.4	Supervisory processes - including stress tests	ST/LT	EBA	Not expected
2.5	Resolution	ST	EBA	Not expected
3	Consolidated single rulebook	LT	EBA	Not expected
Reporting				
4	Integrated reporting	LT	EBA	Not expected
5	Review and reduce existing reporting requirements	ST	EBA, CA	Not expected
6	Implement a public EU repository of CA data requests	ST	EBA, ECB, CA	Not expected
7	EU-National coordination of reporting initiatives	ST	EBA, ECB, CA	Not expected
8	Change management actions	ST	EBA	Not expected
Holistic picture				
9	Reflect on the streamlining of capital/buffer/MDA requirements and the multitude of tiers of own funds and TLAC/MREL	ST/LT	EBA	Expected
10	Introduce a more systematic application of simpler rules for the SNCI category while maintaining a single bank regime and explore the expansion of the SNCI category	ST/LT	EC/EBA	Expected
11	Reflect on the existing balance of the home-host responsibilities and the use of waivers in the Single Market in the context of the Banking Union	LT	EBA, CA, EC	Possible
12	Increase consistency across risk management concepts and expectations across regulated areas	LT	ESAs/JC	Not expected
13	Facilitate information sharing and re-use of reported data across authorities	LT	EC/ESAs	Possible
14	Set up supervisory platforms bringing authorities from various horizons together	ST	EBA, CA	Not expected
15	Develop common IT platforms (one stop shop) for info sharing and supervisory coordination	ST	EBA	Not expected
16	Revisit the respective roles of L1/2/3, rely more on directly applicable rules	LT	EC/EBA	Not expected
17	Provide a more detailed account of supervisory convergence in the EU	ST	EBA	Not expected
18	Periodically report to co-legislators about the adequacy and impact of the EU framework	LT	EBA	Not expected
Internal organisation				
19	Rebalance EBA/CAs allocation of resources towards ex post convergence	ST	EBA/CA	Not expected
20	Introduce top-down guidance to selected policy developments	ST	EBA	Not expected
21	Review the number of substructures, their mandate and strengthen their dialogue with BoS	ST	EBA	Not expected

3. ACTIVITIES

161. This section sets out the EBA's activities in 2026, linking outputs to activities and priorities and indicating the expected time for delivery. It comprises 269 deliverables, of which 126 are of an ongoing nature and 143 have legal or self-imposed deadlines. EBA's tasks are grouped into seven overarching activities (see corresponding resources in Annex II). The planning reflects the short-term measures the EBA is envisaging on simplification and efficiency.

Activity 1 – Policy development

Contributing to priority 1	Directorates: PRSP, ICC, ERA Units: LILLAC, RBM, SRRR, COPAC, DF, ESGR
Objective	To develop and maintain an effective, simple, efficient and proportionate Single Rulebook for banking and financial activities in the EU
Description	<p>EBA's founding regulation and specific legislations mandate the authority to contribute to a Single Rulebook for banking and financial activities in the EU by developing technical standards, guidelines or reports, and advising on new rules.</p> <p>This Single Rulebook establishes common rules in a wide range of areas for financial entities and the authorities which supervise them throughout the EU. It creates a level playing field for financial entities and provides high protection to depositors, investors and consumers. EBA's output is prepared based on impact assessments and giving due consideration to proportionality. Stakeholders are systematically consulted.</p> <p>After more than a decade of policy development and with the ongoing EU implementation of Basel 3 and key milestones achieved for digital and sustainable finance, the EBA will be increasingly focussing on the efficiency and simplicity of the Single rulebook. (TFE recommendations 1 and 2)</p>

Main deliverables

Prudential regulation (CRR, CRD, SEC R, IFR, IFD, EMIR, CSDR...)	Delivery
- Capital and loss absorbency	
• Targeted review of the RTS on own funds and eligible liabilities	Q1
• Reflection on capital stacks simplification (micro, macro, resolution) – TFE reco 9	
- Accounting and auditing (incl. consolidation)	
• Opinions on financial holding company derogations	Ongoing
• GL on the definition of ancillary service undertaking	Q1
• Report on CRR definitions and provisions on consolidation	
• Contribution to the IASB Dynamic Risk Management (DRM) project	Q4
- Liquidity risk	
• Report on LCR and NSFR implementation	Ongoing
- Interest rate risk in the banking book	
• Implementation of the EBA IRRBB heatmap action plan	Ongoing
- Credit risk – TFE reco 2.1	
• GL on the methodology to estimate IRB-Credit Conversion Factors	Q1
• RTS on risk weights for exposures secured by mortgages on immovable property	
• RTS on IRB assessment methodology	Q2
• RTS on permanent partial use – CP	
• Amending GL on definition of default	
• RTS on material model change	

Prudential regulation (CRR, CRD, SEC R, IFR, IFD, EMIR, CSDR...)	Delivery
<ul style="list-style-type: none"> • RTS on categorisation within the specialised lending exposure class –TFE reco 1²² • Report on the calibration of IRB risk parameters for specialised lending • Report on the recognition of capped or floored unfunded credit protection • Report on securities financing transactions' capital requirements • GL on artificial cash flow and discount rate 	
<ul style="list-style-type: none"> • RTS on criteria for high quality project finance specialised lending exposures • RTS on risk weights application to specialised lending exposures • Report on IRB shortfall • RTS on comparable property – CP • GL on immateriality of size and risk profile of exposures – CP • RTS on dilution risk – TFE reco 1 	Q4
<i>- Securitisation and covered bonds</i>	
<ul style="list-style-type: none"> • Preparations for the EC legislative proposal on securitisation 	Q4
<i>- Large exposures</i>	
<ul style="list-style-type: none"> • GL on exposure limits for shadow banking entities • Update of the GL for Identifying a Group of Connected Clients 	Q4
<i>- Market, counterparty and CVA risk</i>	
<ul style="list-style-type: none"> • EU implementation of Basel III market risk, CVA and CCR framework 	Ongoing
<ul style="list-style-type: none"> • Report on haircut floors for SFTs 	Q4
<i>- Operational risk</i>	
<ul style="list-style-type: none"> • RTS on the exclusion of losses – TFE reco 1 • GL on governance arrangements for loss data sets – CP • RTS on the risk management framework – CP 	Q2
<i>- Investment firms</i>	
<ul style="list-style-type: none"> • RTS on waiver for authorisation of investment firms • RTS on the reclassification of investment firms as credit institution • RTS on the monitoring of the EUR 30 bn threshold 	Q4
<i>- Market access</i>	
<ul style="list-style-type: none"> • Joint-ESAs system for exchanging fit & proper assessments information – TFE reco 15 • RTS on booking arrangements third country branches (TCB) • RTS on minimum information to be provided for assessing qualified holdings (QH) • GL on authorisation of third country branches (TCB) • GL on internal governance of TCB • GL on prudential and AML/FIU authorities cooperation for TCB – TFE reco 1 • GL on instruments for minimum endowment of TCB • RTS on cooperation and supervisory colleges for TCB • Update of EBA ESMA GLs on the suitability of MB members – TFE reco 2.2. • RTS on CAs suitability assessments of members of key function holders under CRD6 • Update GL on internal governance under CRD6 • Update GL on outsourcing – TFE reco 2.2 	Ongoing
	Q1
	Q2
	Q3
<i>- Supervisory action</i>	
<ul style="list-style-type: none"> • GL on conflicts of interests in and independence of competent authorities • Update of the GL on the SREP (with delivery of GL on SREP for TCB) – TFE reco 2.4 • RTS on supervisory powers on material holdings acquisitions and mergers • ITS on cooperation between CAs for acquisition of material holdings • ITS on the consultation process between the competent authorities in case of mergers • Review of the GL on sectoral systemic risk buffers to address climate risk 	Q1
	Q2
	Q4

²² Mandate / work identified will be considered as part of TFE recommendation 1. The way forward may require an EBA agreement with the European Commission and co-legislators to (preferably) not deliver them or (at least) postpone their due date.

Market infrastructures (EMIR and CSDR)
- EMIR

- Update RTS on EMIR initial margin model validation, TBC
- GL on application/ authorisation

- CSDR

- RTS for Measurement and reporting of Credit and Liquidity Risks Q2/Q3
- RTS on rules and procedures on conflict of interests – TFE reco 1
- RTS on thresholds for provision of banking-type ancillary services
- Report on provisioning of banking-type ancillary services for CSDs Q4
- Report on residual credit risk loss for CSDs

Crisis management (BRRD, DGSD, CMDI)
- Depositor protection

- RTS on Client funds - CP Q2
- ITS on DGS Reporting (from credit institutions to DGS and from DGS to the EBA) – CP
- GL on calculation of contributions to DGS funds (codifying own-initiative GL) – CP
- GL on irrevocable payment commitments (codifying own-initiative GL) – CP
- RTS on information from credit institutions and DGS to consumers – CP Q3
- GL on preventive measures – CP

- Recovery and resolution

- Report on Recovery plan dry runs (own initiative) Q1
- Review of the RTS on resolution planning Q1
- Review of the RTS on resolution colleges – TFE reco 2.5
- MREL Impact Assessment Report

Sustainable finance (CRR, CRD, SFDR)

- Inputs to sustainability work arising from applicable regulation – TFE reco 2.3 Ongoing
- Reports and advice to EC on sustainable finance-related topics – TFE reco 2.3
- Report on effective riskiness, additional modifications to the framework and effects on financial stability and bank lending – phase 1 – TFE reco 2.3 Q2
- Joint RTS on ESG rating disclosures – mandate from the new ESG Ratings Regulation TBC

Payment services and electronic money (PSD, PSR, FIDA)

- Roadmap on the implementation of the EU Payment Package²³ – TFE reco 1 Q2

Consumer protection and financial education

- GL on financial inclusion and the Digital Euro (under the forthcoming act) Q4

Innovation monitoring and knowledge sharing, ICT policy and operational resilience

- Technical inputs to EU initiatives in digital finance (i.e. digital Euro, DORA, MiCA) Ongoing

Activity 2 – Supervisory convergence and enforcement

Contributing to priority 1	Directorate: PRSP, ICC, ERA Units : LILLAC, RBM, SRRR, COPAC, DF, ESGR, L&C
Objective	To promote a consistent and effective application of the Single Rulebook for banking and financial activities in the EU
Description	To foster consistent and transparent supervisory and resolution practices and outcomes in the EU, based on the application of the Single Rulebook, the EBA sets common priorities for prudential and resolution authorities (USSP) and monitors their implementation, runs benchmarking exercises, participates in and monitors of colleges, ensures training for authorities, performs peer reviews and other assessments of convergence.

²³ At present there are 22 mandates included in the Payment service Regulation (PSR), 18 mandates in the Payment Services Directive (PSD3), and 18 mandates in Financial Information Data Access Act (FIDA). Work on the mandates will be executed in accordance with the Roadmap and start in 2026.

The EBA may assist authorities in resolving disputes and disagreements related to their supervision and resolution of cross-border banks through binding or non-binding mediation. It may investigate breach of Union law and issue recommendations to authorities. It monitors and fosters authorities' independence.

With the Single rulebook now well developed in a wide range of areas, the EBA will gradually increase the relative importance of its convergence work vis-à-vis policy development. (TFE recommendation 17)

Main deliverables

<i>Supervisory convergence (prudential and resolution)</i>	<i>Delivery</i>
• EBA annual report on supervisory convergence work in 2025 – TFE reco 17	Q2
• Union Strategic Supervisory Priorities for prudential and resolution authorities in 2027	Q3
• Supervisory disclosure exercises (CRD / IFD)	
• ESA's supervisory independence assessment	Q4
<i>Q&A</i>	
• Q&A: answering questions of external stakeholders on the Single Rulebook	Ongoing
<i>Peer reviews</i>	
• Follow-up peer review – ICT risk	Q1
• Follow-up peer review – PSD2 authorisation	
• Peer review – Pillar 3 transparency	Q2
• Follow-up peer review – Treatment of mortgage borrowers in arrears	
• Peer review work plan	
• Follow-up peer review – Definition of default	Q4
• Peer review – Resolution	
<i>Breach of Union law, Complaints and mediation</i>	
• Identification and investigation of potential breaches of EU law	Ongoing
• Settlement of possible disagreements between CAs	Ongoing
<i>Training</i>	
• Training programme for competent authorities	Ongoing
<i>Prudential regulation (CRR, CRD, SEC R, IFR, IFD, EMIR, CSDR...)</i>	
<i>- Own funds and capital requirements</i>	
• Assessment of new CET1 instruments and maintenance of the EBA CET1 list	Ongoing
• Monitoring of capital (CET1, AT1, Tier 2) and MREL-TLAC instruments	
• Monitoring of own funds and eligible liabilities (including impact of interest rates)	
• Monitoring of the leverage ratio implementation	
<i>- Accounting and auditing</i>	
• Monitoring of accounting standards (including liaison with IASB)	Ongoing
• Follow up of the EBA IFRS 9 benchmarking reports with competent authorities	
<i>- Liquidity risk</i>	
• Monitoring of national practices on liquidity and national options and discretion	Ongoing
• Monitoring of interdependent assets and liabilities for the NSFR	
• Monitoring of interdependent inflows and outflows for the LCR	
• Assessment of CRR and LCR DA notifications related to liquidity and follow-up actions	
• Maintain list of credit institutions exempted from 75% inflow cap LCR	
<i>- Interest rate risk</i>	
• Monitoring of the implementation of the RTS and GLs related to IRRBB and follow-up on scrutiny plans	Ongoing

<i>- Credit risk</i>		
• Maintenance of credit risk lists (incl. eligible public-sector) – <i>ECAI mapping</i>	Ongoing	
• * <i>deprioritised</i> ²⁴		
• Monitoring of credit risk and credit risk modelling (incl. IRB roadmap)		
<i>- Securitisation and Covered bonds</i>		
• Monitoring of market and application of securitisation & covered bonds frameworks	Ongoing	
• Monitoring report on collateralisation practices	Q4	
• <i>Monitoring report on capital treatment of STS synthetics – * deprioritised</i>		
• <i>Monitoring report on the treatment of NPL in securitisation – * deprioritised</i>		
<i>- Market, counterparty and CVA risk</i>		
• Updates to the list of diversified stock indices	Ongoing	
• Monitoring of market risk requirements (incl. FRTB postponement)		
<i>- Supervisory benchmarking</i>		
• 2026 Supervisory benchmarking exercise (internal approaches)	Ongoing	
• 2025 benchmarking report on IRB models	Q1	
• 2025 benchmarking report on market risk models		
• Preparation of the 2027 benchmarking portfolios (credit & market risk), update of ITS	Q2	
<i>- Market infrastructure</i>		
• Work on market infrastructures (EMIR/CSDR-related)	Ongoing	
<i>-Operational risk</i>		
• Monitoring and promotion of consistent application of operational risk requirements, with primary focus on IDLC derogation and ASA grandfathering	Ongoing	
<i>- Investment firms</i>		
• Monitoring and promotion of consistent application of investment firms requirements	Ongoing	
<i>- Internal governance (including remunerations)</i>		
• Monitoring of internal governance and remuneration requirements`	Ongoing	
• Review of remuneration and diversity benchmarking activity and reports – TFE reco 2.2	TBC	
<i>- Supervisory and resolution reporting</i>		
• Enhancement and maintenance of signposting tool for reporting and disclosure	Ongoing	
<i>- Pillar 3 and disclosures</i>		
• <i>Monitoring of Pillar 3 disclosures – * deprioritised</i>	Ongoing	
<i>- Sustainable finance (CRD, SFDR)</i>		
• Support the implementation of requirements	Ongoing	
• Contributing to European Platform on Sustainable Finance		
• Annual report under Article 18 SFDR 2026	TBC	
<i>Crisis management (BRRD, DGSD, CMDI)</i>		
• 2025 report on the uses of DGS funds and financial means available to DGSs	Q2	
<i>Colleges</i>		
• Monitoring of supervisory colleges	Ongoing	
• Monitoring of resolution colleges		
• Operationalisation of recovery and resolution planning		
• Monitoring convergence in the area of resolution		
• Monitoring of MREL		
• Preparatory work for coordinating crisis management exercises		

²⁴ Work marked as * deprioritised had been identified as deprioritised in previous work programmes due to resources constraints. This has been maintained.

- Set up supervisory platforms bringing authorities from various horizons together – TFE reco 14

Consumer protection, payments and conduct (MCD, CCD)

- | | |
|--|----|
| • Assess legal entities' compliance with EBA Guidelines on de-risking | Q2 |
| • Assess legal entities' compliance with the EU Credit Servicers Directive | Q3 |
| • Revised consumer factsheet (when buying products online or via mobile phone) | |
| • 2026 EBA/ECB Report on payment fraud data | Q4 |
| • Submit to the EU Commission fee data reported under the Instant Payments Regulation | |
| • Follow-up to 2019 JC report on cross-border supervision of retail financial services | |
| • Action plan reviewing application of the revised Consumer Credit Directive | |
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Digital finance

- Innovation monitoring and knowledge sharing, ICT policy and operational resilience

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|--|---------|
| • Innovation monitoring and knowledge-sharing (FinTech Knowledge Hub, EFIF) | Ongoing |
| • Possible Opinions, GL or thematic reports supporting AI Act implementation for banking and payment | |
| • Support to the Supervisory Digital Finance Academy | |
| • Support to DORA consistent implementation by CAs | |
| • Thematic report on the provision by third parties of AI systems to the EU banking sector | Q4 |
| • Factsheet on latest trends on the use of tokenised settlement assets by EU banks | |
| • Consumer financial education and supervisory convergence actions (white labelling) | |
| • Monitoring of the relevance of BigTech in the banking and payments sector | |
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- MiCA

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| • Support to consistent implementation of MiCA by CAs | Ongoing |
| • Opinions on classification of crypto assets | |
| • Monitoring of crypto-asset markets (esp. ART and EMT) | |
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Activity 3 – Risk and financial stability analysis

Contributing to Directorate: ERA

priority 2 Units: RAST, EAIA, ESGR

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|-------------------|---|
| Objectives | 1) To identify and monitor risks and vulnerabilities in the EU banking and financial sector |
| | 2) To assess the resilience of EU financial institutions and of the EU banking system as a whole to adverse developments |
| | 3) To maintain and enhance state of the art tools, models and methodologies for risk and policy analysis, stress testing and other EBA functions. |
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Description The EBA monitors and analyses risks and vulnerabilities of the EU banking and financial sector from a micro, macro and resolution perspective, to identify and promote adequate regulatory and supervisory responses. This feeds into presentations to the EBA's governing bodies and external publications (e.g. Risk assessment reports, risk dashboards). The EBA's related research work creates opportunities for workshops, seminars and staff papers. The EBA strives to mobilise new technologies and AI for these analyses.

Every other year, the EBA coordinates an EU-wide stress test exercise of the banking sector, with CAs and the ESRB. It will keep developing top-down methodology (as for Net Fee and Commission Income in 2023 and Net Interest Income in 2025) and gradually integrate climate and environmental risks.

Main deliverables

Risk and economic analysis	<i>Delivery</i>
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- Risk analysis

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| • Analyses of risks and vulnerabilities for the EU banking sector | Ongoing |
|---|---------|
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• Opinions on macroprudential measures	
• Publication of thematic notes (incl. on ESG risks)	
• Quarterly risk dashboard	Quarterly
• JC Spring risk report	Q2
• Risk assessment questionnaires (Spring 2026)	
• Q2 Risk assessment report of the EU (incl. funding, asset encumbrance & liquidity)	
• List of other systematically important institutions (OSIIs) 2026	Q3
• JC Autumn update on risks and vulnerabilities	
• Q4 Risk assessment report of the European banking system (incl. Retail Risk indicators)	Q4
• Risk assessment questionnaire (Autumn 2026)	
<i>- Economic analysis</i>	
• Enhancement of EBA economic and statistical methodologies and tools	Ongoing
• Thematic notes on economic and regulatory developments	
• EBA staff papers	
• Academic seminars and research workshops	
• Annual QIS data collection and Basel III monitoring dashboard	Q4
• Policy research workshop	
<i>- Stress test</i>	
• Enhancement of the stress test methodology (incl. top-down capacity) – TFE reco 2.4	Ongoing
• Integration of environmental risk in the stress test framework	
• 2027 EU-wide stress test exercise methodology	Q3
<i>- ICT threat landscape</i>	
• Assessment and analysis of major ICT incidents reported	Ongoing
• Issuance of warnings and high-level statistics on ICT threats and vulnerabilities	
• Operation and maintenance of incident response mechanism (EU-SCICF)	
• ESAs Annual report on major ICT-related incidents	Q2

Activity 4 – Oversight and supervision

Contributing to priority 2	Directorate: DORA Oversight, ICC, PRSP Units: DORA Oversight units 1 and 2, DF, RBM
Objectives	1) To oversee ICT Critical Third-Party Providers 2) To supervise issuers of significant ARTs and EMTs 3) To validate industry-wide initial margin models under EMIR3
Description	<p>In 2026 the EBA will continue to roll out new oversight and supervisory responsibilities. This will entail close coordination and cooperation with other EU and non-EU authorities.</p> <p>As a lead overseer, the EBA, in a DORA joint oversight venture with EIOPA and ESMA, will assess and monitor risks arising from and faced by CTPPs. This will be supported by CAs from the three sectors which will also follow-up on the lead overseer's recommendations with the financial entities they supervise.</p> <p>MiCA entrusts the EBA with the responsibility of identifying significant ARTs and EMTs and supervising those (jointly with the home competent authority for significant EMTs).</p> <p>EMIR 3 established the EBA as the central validation hub for certain initial margin models.</p>
Main deliverables	
DORA Oversight	<i>Delivery</i>
• Carrying out DORA oversight activities	Ongoing
• Engagement CTPPs (execution)	
• External engagement – third country cooperation	

<ul style="list-style-type: none"> • Oversight activity planning (execution) • CTPP Risk assessment (execution) 	Q1
MiCA Supervision	
<ul style="list-style-type: none"> • Significance assessment of issuers of ART/EMT • Supervision of significant ARTS and EMTs (if warranted) • Investigations of supervisory/enforcement decisions under MiCA • Exertion, as appropriate, of intervention powers 	Ongoing
EMIR validation of initial margin models (IMM)	
<ul style="list-style-type: none"> • Develop internal supervision guidance and supervisory tools • Approve changes to certain IMM • Coordinate with EU and non-EU competent authorities on changes to certain IMM • Monitor developments in derivatives markets 	Ongoing

Activity 5 – Data

Contributing to priority 2	Directorate: DART Units : STATS, RT
Objectives	1) To develop a simple and efficient reporting framework for financial entities in EBA's remit 2) To ensure timeliness, completeness and accuracy of reported data for users 3) To facilitate market discipline through adequate transparency in the banking sector
Description	<p>The EBA's harmonised reporting and disclosure facilitate the assessment of financial risks by authorities and market participants, and support the authority's policy development, risk assessment and convergence activities.</p> <p>The Authority provides technical standards and guidelines for financial entities' reporting and carries out regular data collections. Is developing a common data dictionary and IT tools (DPM studio) to foster bank reporting integration. EUCLID provides a secure and efficient platform for collecting and processing data from financial institutions. A dissemination portal (including a Pillar 3 datahub) facilitates access to banks' data and disclosure.</p> <p>As part of its simplicity and efficiency agenda, the EBA intends to reduce reporting costs, increase reporting proportionality, leverage its data capabilities to carry out impact assessments at an earlier stage of policy development, streamline its risk assessments (including the EU-wide stress-test), automatise data collection processes, increase data dissemination capabilities, and support the supervisory and regulatory community through new partnerships. (TFE recommendations 5, 6, 7, 8)</p>

Main deliverables

Reporting and Transparency	Delivery
<ul style="list-style-type: none"> • Maintenance of the technical package supporting reporting and Pillar 3 frameworks • Evolution of DPM 2.0 and DPM studio to support an integrated reporting system • Development of an integrated reporting system (Joint Bank Reporting Committee, Reporting Contact Group), semantically integrated glossaries of specific topics – TFE reco 4 (long-term) • Contribute to implementation of EU Supervisory Data Strategy across financial sectors • Maintenance of mapping tool between reporting and Pillar 3 • Maintenance of the Pillar 3 data hub 	Ongoing
- Supervisory and resolution reporting	
<ul style="list-style-type: none"> • Technical package for 4.3 reporting framework release • Public EU-wide data request repository – TFE reco 6 • Guidance on data requests – TFE reco 7 	Q3
<ul style="list-style-type: none"> • Review and <u>simplification</u> of the supervisory and resolution reporting framework (incl. FINREP, own funds, liquidity and new reporting on ESG and regular stress testing data), with change management – TFE reco 5 and 8 	TBC

• Draft GL on EMIR IMMV reporting	
<i>- Transparency and Pillar 3</i>	
• Maintenance of the Pillar 3 framework	Ongoing
• Monitoring of EU and international disclosure developments	
• Monitoring work on CSRD by EFRAG and opinions on sustainability reporting standards	
• GL on specific publication requirements – TFE reco 1	Q3
• RTS on disclosure requirements / resubmission policy	
• Extension of Pillar 3 data hub to SNCIs	TBD
Data infrastructure and services, statistical tools	
• Support and maintain the EBA's data infrastructure	Ongoing
• Enhance transparency via re-use of supervisory info and pre-populated templates	
• <i>Data support to regulatory work and technical advice to EC – * deprioritised</i> ²⁵	
• Provide data-based support for the statistical activities related to top-down stress test	
• <i>Data support to supervisory benchmarking – *deprioritised</i>	
• <i>Training of CA and EBA users on data and analysis tools – * deprioritised</i>	
• Improve data processing, analytical capabilities and access	
• Risk dashboard (RDB) and other related tools, such as the MREL, the ESG and the Basel 3 dashboard, for internal and external data users	Quarterly / semi-annually / annually
• Bank-specific dashboards for internal users and CAs	annually
• 2026 EU-wide Transparency exercise	Q4

Activity 6 – Governance

Contributing to all priorities	Directorate: N/A Units : GEA, L&C, IT, CS
Objectives	1) To support EBA's governing bodies and management 2) To coordinate stakeholder engagement and ensure accountability
Description	The activity supports the EBA's governing bodies and management, including ensure the secretariat of the Boards, planning and monitoring the allocation of resources and the execution of the activities, managing the enterprise's risks, internal control and compliance and preparing accountability documents. It provides legal advice to the Authority. It supports and oversees EBA's working structures and the engagement with all external stakeholders. It is responsible for the Authority's internal and external communication. In application of recommendations 20 and 21 of the TFE, the EBA will also introduce top-down guidance to selected policy developments and review the number of substructures, their mandate and strengthen their dialogue with the BoS.

Main deliverables

Stakeholder engagement, planning and strategy	<i>Delivery</i>
• Support to EBA's governing bodies (BoS and MB) and management	Ongoing
• Support to EBA's internal structures (BSG, ACP, BoA, ESAs JC, EBA's working structures)	
• Management of EBA's stakeholder engagement with EU and non-EU stakeholders	
• Coordination of internal policies/processes supporting EBA's activities	
• Planning and monitoring of the execution of the work programme	
• Reports and opinions on 3 rd country regulatory and confidentiality equivalence	
• Support to implementation of EU's Association Agreement with Andorra & San Marino	
• Draft Single programming document (2027-2029)	Q1
• Annual report 2025 (and Consolidated annual activity report 2025)	Q2
• JC Annual report 2025	

²⁵ Work marked as * deprioritised had been identified as deprioritised in previous work programmes due to resources constraints. This has been maintained.

• Work programme 2027	Q3
• JC Work programme 2027	
• Opinion on EP 2024 discharge report	
• MoU between AMLA prudential supervisors, NCAs responsible for MiCA and ESAs	TBC
Legal advice	
• Legal advice on all relevant matters (including in case of litigation)	Ongoing
• Enforcement	
• Handling of access to documents requests	
• Representation of EBA before Board of Appeal, ECJ, Ombudsman (as necessary)	
ERM, audits and internal control	
• Coordination of business continuity annual exercise and plan	Ongoing
• Contribution to internal control system	
• Follow-up to audits (ECA, EC IAS, external financial auditors)	
• Implementation of data protection, ethics, whistleblowing, anti-fraud frameworks	
• Implementation of Enterprise risk management (ERM)	
• Maintenance of EMAS registration	
• Coordination of the implementation of Sustainability Reporting standards	
Communication	
• External and internal communication	Ongoing

Activity 7 – Operations

Contributing to all priorities	Directorate: Operations Units : FP, HR, IT, CS
Objective	To enable the EBA's activities in a cost-efficient and state-of-the art manner
Description	A wide range of services are necessary for the EBA's daily operations: finance and procurement, human resources, IT and corporate support. They need to be delivered in a seamless manner and to the highest possible standards, for an optimal use of the authority's human, financial and technical capabilities.

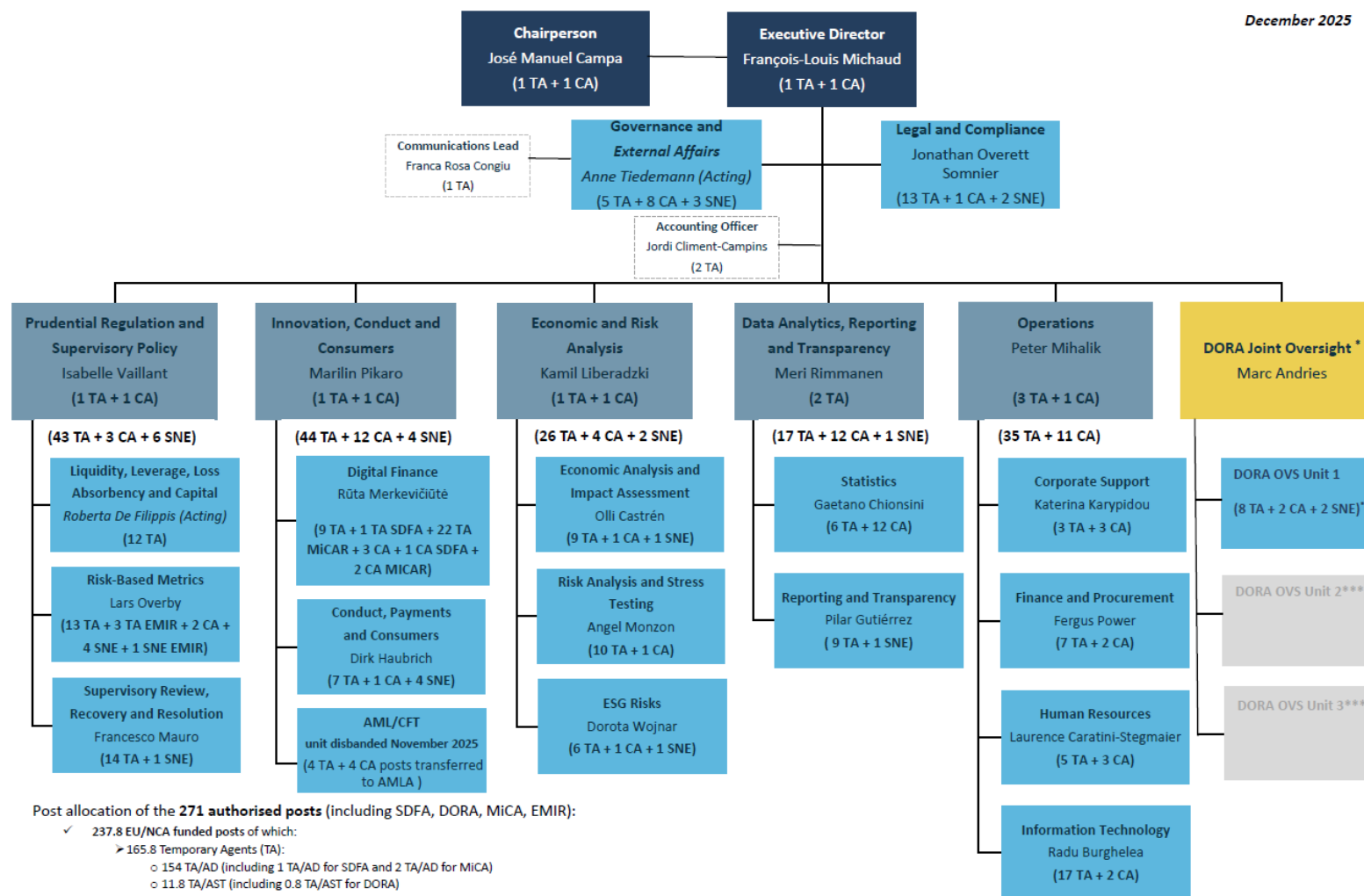
Main deliverables

HR	<i>Delivery</i>
• Execution of the Establishment Plan	Ongoing
• Compliance with applicable staff rules	
• Execution of Horizon - Talent strategy	
• Continuation of HR digitalisation (deployment of EC's SYSPER tool)	
Finance	
• Establishment of the 2025 annual accounts	Ongoing
• Execution of 2026 annual budget including procurement plan	
• Preparations for 2027 and 2028 budgets	
• Implementation of Commission's financial management system (SUMMA)	
• Refinement of fee funding tools and processes	
Corporate	
• Provision of solutions for EBA premises and related services (incl. physical security)	Ongoing
• Management of EBA assets	
• Organisation of EBA meetings and initiatives	
• Support to EBA staff missions	
Information and communication technology	
<i>Execution of EBA's IT Strategy and 2026 Operational IT plan</i>	

<i>- Support and optimisation of Enterprise IT solutions (inc AI)</i>	
• Document Management, Collaboration Platform, Identity & Access Management, Extranet, Intranet, EC solutions (Sysper, Missions, SUMA)	Ongoing
• Enhance productivity and efficiency by utilising AI Capabilities	
<i>- EBA Mandates: Evolution and implementation of IT solutions</i>	
• Pillar 3 Hub, EMIR3 (IMMV)	Q3
• EUCLID evolution to support additional data collections (i.e, Instant Payments)	Q4
<i>- EBA Data hub</i>	
• Evolution of EBA analytics and dissemination capabilities (EDAP, Databricks, SAS)	Ongoing
<i>- Oversight</i>	
• DORA Designation of CTPPs/ Register of information	Q1
• Rollout of DORA Oversight systems and onboarding of JET members	
• Hypercare support for DORA Oversight systems	Q2
• Support and evolution of MiCA shared platform	
<i>- EURECA Transfer to AMLA</i>	
• EURECA Transfer to AMLA	Q1
• Hyper care support for EURECA	Q2
<i>- Deployment and optimisation of Cybersecurity Frameworks</i>	
• EBA compliance and security activities	Ongoing
• Implementation of New Cybersecurity Regulation	Q1-Q4

ANNEX I: ORGANISATION CHART

December 2025



Post allocation of the **271 authorised posts** (including SDFA, DORA, MiCA, EMIR):

- ✓ 237.8 EU/NCA funded posts of which:
 - 165.8 Temporary Agents (TA):
 - 154 TA/AD (including 1 TA/AD for SDFA and 2 TA/AD for MiCA)
 - 11.8 TA/AST (including 0.8 TA/AST for DORA)
 - 53 Contract Agents (CA) including 1 CA for SDFA, 2 CA for MiCA
 - 19 Seconded National Experts (SNE)
- ✓ 33.2 fee funded posts (FFP), of which:
 - 20 TA/AD for MiCA, 7.25 TA (6 AD + 1.2 AST) for DORA, 3 TA/AD for EMIR, 2 CA for DORA and 1 SNE for EMIR

*DORA Joint Oversight reports to the three ESAs Executive Directors

**Resources allocated to the EBA (of which 2 SNE from the total structural 19 SNE EU/NCA funded)

***The Resources allocated to DORA OVS Unit 2 and Unit 3 are reflected under EIOPA and ESMA

ANNEX II: RESOURCE ALLOCATION PER ACTIVITY – 2025 - 2028

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.)

Activity	2025 ²⁶					2026					2027					2028				
	TA	CA	SNE	Total	Cost (EUR)	TA	CA	SNE	Total	Cost (EUR)	TA	CA	SNE	Total	Cost (EUR)	TA	CA	SNE	Total	Cost (EUR)
1. Policy development	41.6	6.4	10.2	58.2	14 323 364	34.3	4.6	10.6	49.5	9 675 105	35.3	4.6	10.6	50.5	10 719 861	35.3	4.6	10.6	50.5	10 934 258
2. Supervisory convergence and enforcement	35.3	8.6	1.9	45.8	11 271 651	36.6	8.5	1.3	46.5	10 834 801	37.6	8.5	1.3	47.5	11 852 182	37.6	8.5	1.3	47.5	12 089 225
3. Risk, Economic analysis and financial stability	14.3	3.8	0.4	18.4	4 528 349	15.7	4.4	0.2	20.3	4 794 135	15.7	4.4	0.2	20.3	4 890 018	15.7	4.4	0.2	20.3	4 987 818
4. Oversight and supervision	42.3	4.6	3.1	50.0	3 937 695	39.3	4.0	3.4	46.7	8 021 142	39.3	4.0	3.4	46.7	8 181 565	39.3	4.0	3.4	46.7	8 345 196
- DORA Oversight (fee-funded)	7.2	2.0	-	10.0	1 173 299	8.0	2.0	-	10.0	3 208 958	8.0	2.0	-	10.0	3 273 137	8.0	2.0	-	10.0	3 338 600
- MiCA Supervision (fee-funded)	20.0	-	-	20.0		20.0	-	-	20.0	669 310	20.0	-	-	20.0	882 696	20.0	-	-	20.0	900 350
- EMIR validation of IMM (fee-funded)	3.0	-	1.0	4.0		3.00	-	1.0	4.0	839 745	3.0	-	1.0	4.0	856 540	3.0	-	1.0	4.0	873 671
5. Data management	17.8	12.8	1.5	32.1	7 900 000	19.1	12.5	1.5	33.1	8 904 384	20.1	12.5	1.5	34.1	9 657 279	20.1	12.5	1.5	34.1	9 850 425
6. Governance	15.6	7.7	3.0	26.3	6 747 311	12.3	7.5	3.0	22.8	4 154 952	12.3	7.5	3.0	22.8	4 238 051	12.3	7.5	3.0	22.8	4 322 812
7. Operational support	29.2	11.1	-	40.2	10 313 380	33.6	10.5	-	44.1	18 010 728	33.6	10.5	-	44.1	18 370 944	33.6	10.5	-	44.1	18 105 446
Total	196.0	55.0	20.0	271.0	60 195 049	191.0	52.0	20.0	263.0	64 395 247	194.0	52.0	20.0	266.0	67 909 899	194.0	52.0	20.0	266.0	68 635 181

* Activity 'Supervisory convergence and enforcement' includes 2 CA posts funded by SG REFORM for the EU Supervisory Digital Finance Academy.

In relation to Activity 'Oversight and supervision' it should be noted:

- For DORA oversight the situation is as follows: In 2025, 6 allocated fee-funded TA posts should be filled by year end. The 2 fee-funded CA posts and 2 fee-funded TA posts should be filled in 2026.
- For MiCA supervision: The allocated EU-funded posts (2 TA and 2 CA posts) were filled in 2024. In 2026, 2 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.

From 2027 onwards, the allocation includes three TA/AD posts allocated to EBA in the legislative financial statement accompanying the EC proposal for the revised Securitisation framework (which forms part of the ESIU).

The above allocation does not reflect the request for additional resources and funding made in the context of the draft SPD 2026-2028 (set out in more detail in section 2.5).

²⁶ The allocation of resources in 2025 are indicative since in 2025 EBA had a different activity structure.

ANNEX III: FINANCIAL RESOURCES 2026-2028

Table 1 – Revenues (COM report format)

REVENUES	2024 executed budget	2025 amended budget	2026 requested budget	Envisaged 2027	Envisaged 2028
1 REVENUE FROM FEES AND CHARGES	-	1 867 948	6 453 368	7,620,000	7,772,400
2. EU CONTRIBUTION	20,857,871	21 303 298	20 779 030	21 867 544	22 304 895
of which assigned revenues deriving from previous years' surpluses	134 440	424 468	55 073	-	-
3 THIRD COUNTRIES CONTRIBUTION (incl. EFTA)	1,054,571	1 084 651	1 074 459	1 129 974	1 152 574
of which EFTA	1,054,571	1 084 651	1 074 459	1 129 974	1 152 574
4 OTHER CONTRIBUTIONS	34 993 759	35 939 152	36 088 390	37 292 381	37 405 312
of which EU NCA contributions	34 062 640	35 034 213	34 705 036	36 498 163	37 228 126
of which host state contributions	575 000	575 000	1 150 000	550 000	-
of which DG REFORM contributions	356 119	329 939	233 354	244 218	177 186
5 ADMINISTRATIVE OPERATIONS					
6 REVENUES FROM SERVICES RENDERED	-	-	-	-	-
7 CORRECTION OF BUDGETARY IMBALANCES					
TOTAL REVENUES	56,906,201	60 195 049	64 395 247	67 909 899	68 635 181

Table 2 – Calculating NCA contributions

	Inputs	2026 value	Source
A	Amount of the EU subsidy	20 779 030	Set by the budgetary authority
B	Ratio of the EU subsidy to Member State contributions	40:60	EBA founding regulation – recital
C	Budgeted amount of the employer's pension contribution (NCA-funded only)	3 645 980	Calculated by EBA
D	Total NCA voting weight	333	Article 3(3) of Protocol (No 36) on transitional provisions
E	Total EU NCA voting weight	323	Article 3(3) of Protocol (No 36) on transitional provisions
F	Total EFTA NCA voting weight	10	Article 62(1)(a) of Annex IX (Financial services) to the EEA agreement ^{14F19F} . ²⁷

Calculation formulae:

$$EU\ NCA\ contribution = \left(EU\ subsidy * \frac{60}{40} \right) + \left(Pension\ funded\ by\ NCA * \frac{EU\ NCA\ voting\ weight}{Total\ NCA\ voting\ weight} \right)$$

$$EFTA\ NCA\ contribution = EU\ NCA\ contribution * \frac{EFTA\ NCA\ voting\ weight}{EU\ NCA\ voting\ weight}$$

²⁷ <https://www.efta.int/media/documents/legal-texts/eea/the-eea-agreement/Annexes%20to%20the%20Agreement/annex9.pdf>.

Table 3 – NCA contributions

National competent authority	Status	QMV	%	Budget contribution
A	B	C	D	E
Austria	Member	10	3.0%	1 074 459.32
Belgium	Member	12	3.6%	1 289 351.19
Bulgaria	Member	10	3.0%	1 074 459.32
Croatia	Member	7	2.1%	752 121.53
Cyprus	Member	4	1.2%	429 783.73
Czech Republic	Member	12	3.6%	1 289 351.19
Denmark	Member	7	2.1%	752 121.53
Estonia	Member	4	1.2%	429 783.73
Finland	Member	7	2.1%	752 121.53
France	Member	29	8.7%	3 115 932.03
Germany	Member	29	8.7%	3 115 932.03
Greece	Member	12	3.6%	1 289 351.19
Hungary	Member	12	3.6%	1 289 351.19
Ireland	Member	7	2.1%	752 121.53
Italy	Member	29	8.7%	3 115 932.03
Latvia	Member	4	1.2%	429 783.73
Lithuania	Member	7	2.1%	752 121.53
Luxembourg	Member	4	1.2%	429 783.73
Malta	Member	3	0.9%	322 337.80
Netherlands	Member	13	3.9%	1 396 797.12
Poland	Member	27	8.1%	2 901 040.17
Portugal	Member	12	3.6%	1 289 351.19
Romania	Member	14	4.2%	1 504 243.05
Slovakia	Member	7	2.1%	752 121.53
Slovenia	Member	4	1.2%	429 783.73
Spain	Member	27	8.1%	2 901 040.17
Sweden	Member	10	3.0%	1 074 459.32
Norway	Non-voting member (EFTA)	7	2.1%	752 121.53
Iceland	Non-voting member (EFTA)	2	0.6%	214 891.86
Liechtenstein	Non-voting member (EFTA)	1	0.3%	107 445.93
Total NCA		333	100.0%	35 779 495.46

Table 4 – Expenditure

EXPENDITURE	Budget 2024 actual ²⁸	Amended Budget 2025	Budget request 2026	Envisaged 2027	Envisaged 2028
Title 1 Staff expenditure	36 539 088	40 379 850	42 629 558	45 698 928	46 741 281
11 Salaries & allowances	31 493 633	34 663 096	36 207 712	38 904 240	39 855 958
- of which establishment plan posts	25 543 431	27 870 487	29 262 018	31 723 899	32 482 756
- of which external personnel	5 950 202	6 792 609	6 945 694	7 180 341	7 373 202
11.33 Employer's pension contributions	2 861 772	3 349 226	4 023 193	4 110 280	4 197 367
12 Expenditure relating to staff recruitment	324 779	418 155	332 831	371 615	379 047
13 Mission expenses	111 035	130 139	136 330	151 297	150 000
14 Socio-medical infrastructure	635 969	822 979	889 752	856 774	873 909
15 Training	455 832	451 531	347 226	538 030	530 000
16 External Services	518 905	404 291	526 841	619 228	610 000
17 Receptions and events	137 163	140 433	165 673	147 464	145 000
Title 2 Infrastructure and operating expenditure	12 267 264	12 063 847	14 074 057	14 634 506	14 618 363
20 Rental of buildings and associated costs	4 955 855	4 664 107	5 206 577	5 578 733	5 690 308
21 Information and communication technology	6 469 175	6 586 305	7 837 086	8 047 876	7 900 000
23 Current administrative expenditure	510 815	473 010	727 859	627 325	639 872
25 Information and publishing	331 419	340 425	302 534	380 572	388 183
Title 3 Operational expenditure	8 038 909	7 751 352	7 691 633	7 576 465	7 275 537
31 General operational expenditure	2 106 622	2 447 355	3 027 597	3 105 499	3 007 760
32 IT expenditure for operational purposes	5 932 287	5 303 997	4 664 036	4 470 966	4 267 777
TOTAL EXPENDITURE	56 845 261	60 195 049	64,395,247	67 909 899	68 635 181

²⁸ Budget 2024 shows actual expenditure on voted budget.

Table 5 – 2026 Budget request by budget line

EXPENDITURE by Title, Chapter & Budget line	Budget request 2026	Amended Budget 2025	Budget 2024 actual ²⁹	2024 vs 2026 ³⁰	Remarks
Title 1 Staff expenditure	42 629 558	40 379 850	36 709 753	86%	
11 Salaries & allowances	40 230 904	38 012 322	34 521 375	86%	
1100 Basic salaries	29 262 018	27 870 487	25 709 400	88%	Staff regulations of officials of the European Communities (hereinafter "Staff Regulations"). Covers the basic salaries and allowances of temporary staff holding posts on the establishment plans.
1110 Seconded national experts	1 289 500	1 104 451	940 588	73%	Daily and monthly allowances, and travel in/out allowances, for Secondment of National Experts
1111 Contract agents	4 875 948	4 995 601	4 443 125	91%	Conditions of employment of other servants of the European Union. Covers the basic remuneration and allowances of contract agents.
1112 Trainees	780 246	692 557	566 489	73%	Monthly maintenance grant and travel in/out allowances for trainees as per EBA policy.
1133 Employers pension contributions	4 023 193	3 349 226	2 861 772	71%	Cost of employers pension as from Commission Decision on Staff Regulations, and in particular Article 83a paragraph 2. This comprises the amount to be funded by NCA, and the amount to be funded by fees.
12 Expenditure relating to staff recruitment	332 831	418 155	324 779	98%	
1200 Expenditure on recruitment procedure	18 831	55 283	42 097	224%	Expenditure arising from recruitment procedures, in particular the travel costs of applicants attending for written tests, assessment centres, interviews and pre-employment medical examinations, mission costs of external panel members, and vacancy publication costs.
1210 Travel expenses of recruited staff and family	314 000	362 872	282 682	90%	Staff Regulations. Covers: travel expenses due to relevant staff (including their families) on taking up their duties or leaving the institution or transfer to another place of employment. From 2024, also covers: installation and resettlement allowances due to relevant staff obliged to change their place of residence on taking up their duties, on transfer to a new place of employment and upon finally leaving the institution and resettling elsewhere; temporary daily subsistence allowances for relevant staff who furnish evidence that they must change their place of residence on taking up their duties, or transferring to a new place of employment.
13 Mission expenses	136 330	130 139	112 207	82%	
1300 Administrative mission expenses	136 330	130 139	112 207	82%	Mission expenses, expenditure on transport, daily mission allowances, and other ancillary or exceptional expenditure incurred by staff on mission. Also covers

²⁹ Budget 2024 shows actual expenditure on voted budget.

³⁰ Article 37(b)(ii) of the EBA Financial Regulation requires EBA to show "the commitment and payment appropriations for the preceding financial year, and the expenditure committed and the expenditure paid in year N-2 — the latter also expressed as a percentage of the budget of the Authority of year N;"

EXPENDITURE by Title, Chapter & Budget line	Budget request 2026	Amended Budget 2025	Budget 2024 actual ²⁹	2024 vs 2026 ³⁰	Remarks
					<i>cost of travel agency fees, travel insurance, and travel risk management services.</i>
14 Socio-medical infrastructure	889 752	822 979	639 492	72%	
1400 Medical service	80 506	77 475	69 788	87%	<i>Costs of medical services, including medical visits, annual medical check-ups, preventive medical examinations and certain vaccinations.</i>
1410 EBA Education contribution	680 246	604 798	446 184	66%	<i>EBA Education contribution for EBA staff members - Staff Regulations Annex VII, art. 3, related to school fees within the provisions decided by the Management Board. Also includes expenditure relating to Early Childhood Centres and crèches.</i>
1420 Other socio-medical contributions	129 000	140 706	123 520	96%	<i>Canteen (RIE) contribution, home office equipment, and other socio-medical contributions for EBA staff members</i>
15 Training	347 226	451 531	455 832	131%	
1500 Staff training	347 226	451 531	455 832	131%	<i>Staff Regulations, and in particular Art. 24 (a) thereof and Art. 11 and 81 of the CEOS. Covers the costs of language courses as well as learning and development (including courses, events, seminars, information sessions both in-house and outside the EBA) for all staff.</i>
16 External Services	526 841	404 291	518 905	98%	
1600 External services and consultancy	526 841	404 291	518 905	98%	<i>Services of interim staff and other staff-related external services such as PMO charges, accident insurance for non-staff, staff surveys, and interim services, other costs related to staff exchange programme.</i>
17 Receptions and events	165 673	140 433	137 163	83%	
1700 Representation, receptions, team building and social activities for SM	124 173	114 933	114 017	92%	<i>Covers expenditure on the Authority's obligations in respect of representation especially linked with receptions. Also covers team-building events, and work-related social activities cost for staff members.</i>
1702 Staff Committee	41 500	25 500	23 146	56%	<i>Expenditures related to the EBA Staff Committee, such as staff meetings, and sports and cultural clubs contributions.</i>
Title 2 Infrastructure and operating expenditure	14 074 057	12 063 847	12 352 670	88%	
20 Rental of buildings and associated costs	5 206 577	4 664 107	4 955 855	95%	
2000 Building lease costs	4 210 408	4 186 386	3 945 730	94%	<i>Costs deriving directly from the lease of space in the Europlaza building, including rent, charges, taxes, and insurances. Partly covered by external assigned revenue appropriations from French government contribution.</i>
2030 Maintenance, cleaning and repairs	368 669	369 749	363 918	99%	<i>Maintenance costs, incl. statutory maintenance, for premises, lifts, central heating, air-conditioning equipment, etc.; regular and occasional cleaning operations, etc.; repainting and repair services and associated supplies. Utilities costs charged directly to EBA by provider.</i>
2050 Fitting out premises and refurbishment works	627 500	107 972	646 207	103%	<i>Covers the fitting-out of the office premises e.g. alterations to partitioning, alterations to technical installations and other specialist work on locks, electrical equipment, plumbing, painting, floor coverings, etc. It also covers the necessary equipment and furnishings. Includes project management costs in the case of larger-scale works.</i>

EXPENDITURE by Title, Chapter & Budget line	Budget request 2026	Amended Budget 2025	Budget 2024 actual ²⁹	2024 vs 2026 ³⁰	Remarks
21 Information and communication technology	7 837 086	6 586 305	6 527 336	83%	
2100 Software package and information systems	1 142 039	838 762	1 069 340	94%	Costs of purchase or rent “common” software and includes installation, maintenance and support for the software including all related expenses, where the software is being used for administrative purposes. This includes e.g. operating systems, office software, database software etc.
2110 Computing and telecommunications machinery equipment and supplies	186 121	201 668	222 396	119%	Covers purchase and rental of “common” hardware and includes the installation, maintenance, support and all related expenses, where the hardware is being expended for administrative purposes. This includes e.g. laptops, screens, printers and supplies, network equipment, telephones, etc.
2120 IT Services: consulting software development and support	6 508 926	5 545 875	5 235 600	80%	Covers purchase of “common” services such as consultancy services, software development and support services for administrative purposes. This includes e.g. hiring of consultants for IT Support, having software developed or customized, IT infrastructure support, mobile telephony costs, etc.
23 Current administrative expenditure	727 859	473 010	538 060	74%	
2300 Stationery, supplies and related services	45 565	43 079	38 174	84%	Covers office stationery and supplies, and office services such as postal and courier services, offsite storage, confidential waste shredding, plant hire, and external printing.
2320 Legal advice and consultations	214 000	35 000	18 800	9%	Covers the cost of external legal support and consultancy, including on data protection, and on EMAS compliance and related services.
2332 Other administrative expenditure and consulting expenses	468 294	394 931	481 085	103%	Covers sundry administrative services related to administrative matters, including reception, missions and handyman services; health & safety assessments; agency network contribution; treasury fees; bank fees and charges; annual audit fees; security passes etc.
25 Information and publishing	302 534	340 425	331 419	110%	
2500 Communications, publications and translation - administrative costs	62 192	88 818	71 752	115%	Covers editing, translation and publishing expenses for administrative purposes, communications consultancy, promotional campaigns, sponsorships and other communications services and events.
2502 Press and policy monitoring services, subscriptions and library acquisitions	240 342	251 607	259 667	108%	Press monitoring services and media databases, paper and online subscriptions to newspapers and periodicals, library books, corporate memberships of networks, and related items and services.
Title 3 Operational expenditure	7 691 633	7 751 352	8 217 083	107%	
31 General operational expenditure	3 027 597	2 447 355	2 110 029	70%	
3100 Seminars and workshops	16 130	14 306	12 931	80%	The EBA shall play an active role in building a common Union supervisory culture and consistent supervisory practices, as well as ensuring uniform procedures and consistent approaches throughout the Union. The EBA will therefore organise sectoral and cross sectoral training for external stakeholders. This will cover the costs of developing and organising the training, including online courses, and costs of attendance of speakers and participants.
3110 Operational missions	651 370	398 806	356 452	55%	Cost of operational missions for staff including travel, accommodation and subsistence allowances.

EXPENDITURE by Title, Chapter & Budget line	Budget request 2026	Amended Budget 2025	Budget 2024 actual ²⁹	2024 vs 2026 ³⁰	Remarks
3111 General Operational meetings costs	190 815	172 241	213 383	112%	Operational meeting costs related to EBA sub-groups, standing committees and working groups, and the like, held within or outside EBA premises. Includes costs for catering, service staff, rental of rooms, services for the technical set up of the meeting rooms, rental of audio-visual equipment, handyman work for rearranging and set up of room layouts, purchase of meeting-related goods and services. Includes dinners and restaurant visits of EBA working groups (one/year) and reimbursement of external participants including speakers and panel members.
3114 Banking and stakeholders group (BSG) and Board of Appeal (BoA) meetings and reimbursements	172 940	139 204	78 451	45%	Reimbursement of travel costs for Banking Stakeholders Group members representing non-profit organisations and/or academics participating at EBA working groups and meetings. Includes daily allowances for BSG members. Travel and hotel expenses for Board of Appeal (BoA) members, hire of rooms, lunches, refreshments, etc. dinners provided to BoA members and the reimbursement of expenses. Includes costs for members' time.
3120 Operational consulting services	1 085 750	587 109	382 599	35%	Consulting services in relation to operational matters.
3122 Subscription to Data Services and database of financial and market data	448 992	350 342	345 601	77%	Cost of data services and financial market data.
3124 Other subscription services for operational activities	p.m.	p.m.	p.m.	-	Paper and online subscriptions to newspapers and periodicals, library books, corporate memberships of networks, and related items and services required for operational activities
3130 Communication and publication activities, including operational translations costs	461 600	785 347	720 611	156%	Covers cost of editing, translation and publication of document related to the activity of the Agency, i.e. stress tests results. Also covers the cost of operations communication consultancy, campaigns and podcasts. This budget line may receive internal assigned revenue arising from recharges to the other ESA of the costs of translating and editing joint guidelines.
32 IT expenditure for operational purposes	4 664 036	5 303 997	6 107 055	131%	
3200 Software package and information systems	853 245	552 509	840 682	99%	Cost of purchase or rent of operational software, including installation, maintenance, support and related expenses.
3220 IT services: consulting software development and support	3 810 791	4 751 488	5 266 373	138%	Costs of IT services for operational purposes. This includes IT software development services, system and technical consultancy services, IT Support services, IT infrastructure support, etc.
33 Oversight expenditure	p.m.	p.m.	-	-	
3300 Oversight costs claimed by external entities	p.m.	p.m.	-	-	Costs related to oversight activities claimed by competent authorities and other external entities.
TOTAL EXPENDITURE	64 395 247	60 195 049	57 279 506	89%	

For information purpose only, as EBA is expected to be responsible for collecting all DORA fees from critical third-party IT service providers (CTPP) in 2026, the table below shows the breakdown of 2026 overall DORA-related costs per ESAs and CAs which should be reflected in the budget request of the respective authority:

Title	2026 Cost (EUR)
European Banking Authority	4 474 563
European Insurance and Occupational Pensions Authority	2 546 172
European Securities and Markets Authority	3 117 393
Competent Authorities	14 520 835
TOTAL	24 658 963

Table 4 – Budget outturn and cancellation of appropriations

Budget outturn	2022	2023	2024
Reserve from the previous year's surplus (+)	467 881	605 145	207 903
Revenues actually received (+)	50 628 924	52 468 356	56 933 412
Payments made (-)	-43 982 571	-48 857 367	-53 380 720
Carry-over of appropriations (-)	-7 059 468	-3 945 729	-4 083 658
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

The 2024 surplus will be offset against 2026 contributions.

One hundred and twenty-two (122) commitments were carried over from 2023 to 2024. The EBA decommitted 2.24 % of the value of commitments carried over i.e., EUR 79,877 from a total of EUR 3,563,694. This is a slightly higher monetary amount than was decommitted on the previous year's carry forward, however by the EBA's estimation at least 47 % of the decommitted amount arose from matters outside the EBA's control.

ANNEX IV: HUMAN RESOURCES - QUANTITATIVE

Table 1 – 2026-2028 overview of staff by contract type

a. **Overview of total EBA staff (with SDFA - MiCA – DORA – AMLA – EMIR – ESIU)**

Staff	2024 Year N-1			2025 Year N	2026 Year N+1	2027 Year N+2	2028 Year N+3
ESTABLISHMENT PLAN POSTS	Authorised Budget	Actually filled as of 31/12/2024	Occupancy rate% ⁱ	Authorised staff	Envisaged staff	Envisaged staff	Envisaged staff
Administrators (AD)	151	147	97%	151	151	151	151
Assistants (AST) ^a	11	10	91%	11	11	11	11
Assistants/Secretaries (AST/SC)	-			-	-	-	
SDFA ^b	1	1	100%	1	-	-	-
MiCA ^c	20 (0 of 18 FFP)	1	(50%)	22 (0 of 20 FFP)	22 (2 of 20 FFP)	22 (7 of 20 FFP)	22 (12 of 20 FFP)
DORA ^d	6 (2 of 5 FFP)	3	50%	8 (6 of 7.2 FFP) (6 AD+2 AST)	8 (8 of 8 FFP) (6 AD+2 AST)	8 (8 of 8 FFP) (6 AD+2 AST)	8 (8 of 8 FFP) (6 AD+2 AST)
EMIR ^e	-	-	-	3 (0 of 3 FFP)	3 (3 of 3 FFP)	3 (3 of 3 FFP)	3 (3 of 3 FFP)
ESIUI ^f						3	3
AMLA ^g	-	-	-	-	-4	-4	-4
TOTAL ESTABLISHMENT PLAN POSTS	189	162	86% (98%)	196	191	194	194
EXTERNAL STAFF	FTE from authorised Budget	Executed FTE as of 31/12/2024	Execution rate % ^h	FTE from authorised budget	Envisaged FTE	Envisaged FTE	Envisaged FTE
Contract Agents (CA)	50	50	100%	50	50	50	50
SDFA ^b	-	-	-	-	-	-	-
MiCA ^c	2	2	100%	2	2	2	2
DORA ^d	-	-	-	2 (0 of 2 FFP)	2 (2 of 2 FFP)	2 (2 of 2 FFP)	2 (2 of 2 FFP)
AMLA ^g	-	-	-	-	-4	-4	-4
Seconded National Experts (SNE) ^h	19	15	79%	20 (0 of 1 FFP) (19+1 EMIR FFP)	20 (1 of 1 FFP) (19+1 EMIR FFP)	20 (1 of 1 FFP) (19+1 EMIR FFP)	20 (1 of 1 FFP) (19+1 EMIR FFP)
TOTAL EXTERNAL STAFF	71	67	94%^h	74	70	70	70
TOTAL STAFF	260	229	88% (97%)	270	261	264	264
- EU/NCA funded	237			236.8	227	230	230
- Fee-funded posts	23			33.2	34	34	34
EBA REQUEST FOR ADDITIONAL RESOURCES – NOT GRANTED					11 (9 AD + 2 CA)	11 (9 AD + 2 CA)	11 (9 AD + 2 CA)
- of which: permanent					6 (4 AD + 2 CA)	6 (4 AD + 2 CA)	6 (4AD + 2 CA)
- of which temporary (3 years)					5 (5 AD 3 years)	5 (5 AD 3 years)	5 (5 AD 3 years)

FFP stands for fee-funded post

^a In addition to the 11 structural AST posts, 2 AST4 posts for DORA to be yet recruited (1 AST4 is EU/NCA funded from 2024 until October 2025, then fee funded and 1 AST4 fee funded).

^b SDFA: 1 AD and 1 CA funded by SG REFORM (signed SLA in 2022: from 2023 until end of 2025). Under the extension of the SLA to 2028, SG REFORM funds 2 CA. As requested, the CA posts for SDFA, funded by SG REFORM, are shown in Table 1.b below.

^c MiCA: In total the EBA is allocated 22 AD posts and 2 CA posts.

- 2023: total of 15 AD fee funded posts.

- 2024: 3 additional AD fee funded posts + 2 AD EU/NCA-funded posts representing a total of 20 AD posts and 2 CA EU/NCA funded posts planned for indirect supervision tasks for MiCA. 2 AD and 2 CA (EU/NCA funded) filled.
- 2025: 2 additional AD fee funded posts.
- 2026: Fee funded posts to be filled gradually from 2026.

^d DORA: out of the 30 posts (ultimately fee funded) allocated to the three ESAs, the EBA (considering an equal share) is allocated a total of 10 posts (6 AD, 2 AST and 2 CA); see also note a.

^e EMIR validation of certain IMM: allocation of 3 AD fee funded posts and 1 SNE from 2025. Start of validation not before 2026.

^f ESIU: The legislative financial statement accompanying the EC proposal for the revised Securitisation framework (which forms part of the ESIU) allocates 3 AD posts to EBA from 2027 onwards.

^g AMLA: total of 8 posts to be removed given transfer of certain responsibilities to AMLA (4 AD and 4 CA).

^h SNE: 19 “structural cost paid SNEs” + 1 SNE fee funded for EMIR to be hired in 2026. The EBA also relies on 4 cost-free SNE at the end of 2025.

ⁱ Percentages in brackets are showing the real occupancy rate without MiCA/DORA/EMIR fee-funded posts.

Further information on the request for additional resources set out initially is included in sections II.2.

b. Additional external staff expected to be financed from grant, contribution or service-level agreements

Human Resources	Year N	Year N+1	Year N+2	Year N+3
	Envisaged FTE	Envisaged FTE	Envisaged FTE	Envisaged FTE
Contract Agents (CAs)	1	2	2	2
Seconded National Experts (SNEs)	-	-	-	-
TOTAL	-	-	-	-

*As indicated above, the posts included here represents the CAs for the SDFA funded by SG REFORM.

c. Other Human Resources

Structural service providers	FTE in place as of 31/12/2024
Security	-
IT	33
Other (specify) Corporate Support	7
Interim workers	Total FTEs in year 2024
	N-1
Number	5

Table 2 – 2024-2028 -overview of staff by grade

Overview of Temporary agents (with SDFA - MiCA - DORA – AMLA – EMIR – ESIU)

Function group and grade	2024 Year N-1				2025 Year N		2026 YearN+1		2027 Year N+2		2028 Year N+3	
	Authorised budget		Actually filled as of 31/12/2024		Authorised budget		Envisaged		Envisaged		Envisaged	
	Perm anent posts	Temporary posts	Perm anent posts	Temporary posts	Perm anent posts	Temporary posts	Perm anent posts	Temporary posts	Perm anent posts	Temporary posts	Perm anent posts	Temporary posts
AD 16		1		1		1		1		1		1
AD 15		1		0		1		1		1		1
AD 14		5		3		5		2		2		2
AD 13		2		0		2		3		3		3
AD 12		8		10		12		12		12		12
AD 11		12		7		10		14		14		14
AD 10		13		17		19		20		20		20
AD 9		25		24		25		27		27		27
AD 8		28		27		30		31		31		31
AD 7		32		31		35		31*		31		31
AD 6		21		15		20		20*		20		20
AD 5		29		16		23		16		19		19
AD TOTAL	-	177		151	-	183	-	178		181	-	181
AST 11												
AST 10												
AST 8												
AST 7						1		1		1		1
AST 6		3		1		2		2		3		3
AST 5		4		2		2		3		3		3
AST 4		3		3		5		5		4		4
AST 3		1		3		2		2		2		2
AST 2		1		2		1						
AST 1		0		0								
AST TOTAL	-	12		11	-	13	-	13	-	13	-	13
AST/SC*TOTAL	-	-		-	-	-	-		-		-	
TOTAL	-	189			-	196	-	191	-	194	-	194

*The initial request of 188 TA posts has been adjusted:

- The request for additional 9 TA posts needed for addressing challenges/avoid delays (CRR III, CRD VI, CMDI, Stress testing, Data, Cybersecurity) set out in the draft SPD was not granted and has hence been removed from this and other tables.

- 1 SDFA TA post is removed, as under the extension of the SLA with SG REFORM, 2 CA posts are funded, shown below.

Overview of Contract agents (with SDFA – MiCA – DORA – AMLA – ESIU)

Contract agents	FTE corresponding to authorised budget 2024 N-1	Executed FTE as of 31/12/2024 N-1	Headcount as of 31/12/2024 N-1	FTE corresponding to authorised budget 2025 N	FTE corresponding to authorised budget 2026 N+1	FTE corresponding to authorised budget 2027 N+2	FTE corresponding to authorised budget 2028 N+3
Function group IV	44*	44	44	46**	42***	42	42
Function group III	8	8	8	8	8	8	8
Function group II	-	-	-	-	-	-	-
Function group I	-	-	-	-	-	-	-
TOTAL	52*	52	52	54**	50***	50	50

* Figures without the CA/FG IV for SDFA funded by SG REFORM (as included in table 1.b) as per the SLA extended to 2028.

** Figure includes 2 CA/FG IV posts for MiCA (EU/NCA funded) and 2 CA/FG IV posts for DORA (fee funded).

***Figure without 4 CA/FG IV posts for AMLA. The request of 2 additional CA FG/IV for posts needed for addressing challenges/avoid delays (Data and Cybersecurity) was not granted.

Overview Seconded National Experts (SNEs) (with EMIR)

Seconded National Experts	FTE corresponding to authorised budget 2024 (N-1)	Executed FTE as of 31/12/2024 (N-1)	Headcount as of 31/12/2024 (N-1)	FTE corresponding to authorised budget 2025 (N)	FTE corresponding to authorised budget 2026 (N+1)	FTE corresponding to authorised budget 2027 (N+2)	FTE corresponding to authorised budget 2028 (N+3)
TOTAL	19	15	15	20*	20	20	20

* The EBA has 19 “structural cost paid SNEs” + 1 SNE fee funded for EMIR to be hired in 2026. The EBA also relies on 4 cost-free SNE.

Table 3 – 2025 recruitment forecasts following retirement/mobility or new requested posts

Job title in the Agency	Type of contract	TA/Official		CA
	(Official, TA or CA)	Function group/grade of internal (brackets) and external (single grade) recruitment foreseen for publication		Recruitment Function Group (I, II, III and IV)
	Due to foreseen retirement/ mobility	Internal (brackets)	External (brackets)	
Head of Unit	TA	AD9 – AD12	AD9 - AD10	n/a
AD8 – title TBC	TA	AD7 – AD12	AD8	n/a
AD7 – title TBC	TA	AD5-AD7	AD7	n/a
AD6 – title TBC	TA	AD5-AD7	AD6	n/a
AD5 – title TBC	TA	AD5-AD7	AD5	n/a
AST2 – title TBC	TA	AST2 – AST6	AST2	n/a
FGIV – title TBC	CA			IV

Note: Recruitments to fill current vacancies and usual turn-over are planned till end of 2023. However, specific recruitments from 2024-2025 DORA/MiCA posts allocation will be planned/carried out once the resources repartition are further clarified. These recruitments will be carried out accordingly to the entry grade as defined by the Staff Regulations.

ANNEX V: HUMAN RESOURCES - QUALITATIVE

A. Recruitment policy

In compliance with Article 110 of the Staff Regulations, the EBA has adopted the following Implementing Rules:

Authorised travel approving the guide to missions	Commission Decision (2025) 2495
Working time and hybrid working	Commission Decision C(2022)1788
Conduct of administrative inquiries and disciplinary proceedings	Commission Decision (2019)4231
Engagement of CAs	Model Decision C(2019)3016
Engagement of TAs	Model Decision C(2015)1509
Middle Management	Model Decision C(2018)2542
Type of posts	Model Decision C(2018)8800

The EBA is an equal opportunities employer. It selects staff without prejudice as to race, political, philosophical or religious beliefs, gender or sexual orientation, and without reference to their marital status or family situation. The EBA has adopted the EUAN Charter on Diversity and Inclusion.

Talent selection at the EBA endeavour to employ personnel of the highest standards of ability, efficiency, and integrity, from the broadest possible geographical basis among nationals of the EU Member States and the countries in the European Economic Area.

The selection procedures comply with the relevant EU provisions, namely the Staff Regulations (SR/Annex III), the Conditions of Employment of Other Servants of the European Union (CEOS/Article 12) and the Implementing Rules (IRs/use of Temporary Agent and Contract Agent adopted by the EBA with the agreement of the European Commission pursuant to Article 110 of the SR). The number of positions published, and the grades reflect an internal staff planning assessment in accordance with the EBA Establishment Plan capacity and budget based on the objectives and activities to be delivered. The EBA is further developing initiatives to reinforce its place as an employer of choice with a strong Employee Value Proposition through the implementation of an integrated Talent Management, the digitalisation of HR processes with an e-recruitment tool, the development of competencies framework, etc.

The EBA employs Temporary Agents and Contracts Agents as statutory staff. The EBA also offer non-statutory positions as Seconded National Experts (SNEs) and Trainees.

Temporary Agents: the majority of staff in the Agency are Temporary Agents 2(f), except the Management Board Chair and the Executive Director who are Temporary Agents 2(a). Usually, Temporary Agents are recruited for permanent tasks to cover core operational and managerial functions at entry grade level (as per the SR) accordingly to the job profile and expertise. Recruitments are generally done at grades ranging from AST1 to AST4 for Assistants and from AD5 to AD8 for Administrators. Recruitment at higher grade is limited to filling managerial positions, such as TA/AD9 for Middle Manager (HoU) and TA/AD12 for Senior Manager (Head of Departments).

Contract Agents: usually Contract Agents are recruited for permanent tasks to cover junior and support functions, to provide secretarial and technical assistance with operational activities. Recruitments are generally done at grade FG IV for technical level of expertise and for Personal Assistant to the senior Management and at grade FG III for Administrative level of expertise.

Seconded national experts³¹: the objective is to foster the exchange of experience and knowledge and to widen the expertise network, given the specific expertise needed by the EBA that is difficult to find on the market. The initial period of secondment may not exceed two years. It may be extended for a total period of up to five years. The rules applicable to seconded national experts can be found on the EBA's website³².

Trainees: the objective is to offer paid traineeships to talented young professionals early in their careers, in a field of their choice. The selection procedure is open and transparent, done through the publication of a call on the EBA website. Traineeship can last to a maximum of 18 months.

Students: the objective is to provide with students who are enrolled in post-secondary or high education or equivalent level who, typically for a duration of 1 to 5 months, the need to acquire practical work experience, or to fulfil mandatory academic training, or to undertake a stage/training as part of the university/school requirement.

Interns: the objective is to offer job shadowing internship opportunities to students aged 14 to 19 years old to enrich their general civic culture by helping them discover the professional world of an EU Agency and figure out preferences for their professional orientation. Internship usually last for 1-2 weeks.

Structural service providers³³: the EBA benefits from the services of external providers selected through public procurement procedures, mainly in ICT and Corporate Services. The EBA also holds a framework contract with an interim agency to purchase interim services use only under specific circumstances for limited period and in compliance with both the EU legal framework and French labour legislation.

Duration of employment: upon recruitment, Temporary Agents and Contract Agents engaged for permanent tasks are offered an initial contract period of three years with the possibility of renewal (first renewal for three years; second renewal for an indefinite period). The Chairman and Executive Director of the EBA have limited-term employment contracts. The EBA also hold the possibility to offer short-term contract to address time-bound tasks or temporary needs with the principle to renew the contract just once for a definite period.

Renewal of contract at the EBA follows a well-established procedure to ensure the transparent, consistent and fair treatment of all staff members when considering the potential renewal of an employment contract, and to safeguard a consistent decision-making process by the Appointing Authority. The renewal of a fixed-term contract is optional. The Executive Director, in his capacity as the Appointing Authority empowered to conclude contracts of employment, is under no obligation to offer a renewal of a fixed-term contract. The staff member is under no obligation to accept the offer of renewal.

Prior to a decision being made on the renewal of a fixed-term contract of indefinite duration, the following criteria are assessed: (i) the continuity of the post in the establishment plan of the EBA and in its organisational structure; (ii) the performance of the job holder; (iii) the competence(s) of the staff member in post and his/her suitability for the function as it is expected to evolve in the following years; and (iv) the needs of the EBA, paying particular attention to the possible evolution of the function (the potential increase or reduction in the activity) and the alignment of the competences of the staff member with the function as it is expected to evolve over the term of the contract. In addition to the above criteria, the availability of appropriations in the budget is also considered prior to issuing a final decision on the renewal of the contract.

³¹ SNEs are not employed by the agency.

³² <https://eba.europa.eu/about-us/careers/national-experts-on-secondment>.

³³ Structural service providers are not employed by the agency.

B. Mobility

Mobility within the agency

The EBA Internal Mobility Policy serves the purpose of providing staff with career development opportunities, improving staff member's competencies, engagement and retention, as well as meeting the needs of the Authority in terms of performance of tasks and effective resources management, enabling the organisation to effectively adapt to an ever-changing environment. It also supports an open and transparent corporate culture, cross-functional collaboration and information flow between services, enhancing knowledge sharing and project-based culture at the EBA.

Internal mobility at the EBA is legally grounded in Article 7 of the SR and is based on openness, transparency and equal opportunities. It can take different forms: at staff level (staff can express their interest in internal mobility to their line managers, either during the performance management or outside of it to HR); at management level (managers are responsible for identifying staff who might be considered for internal mobility in their teams. Once a year, after the closure of the appraisal exercise, HR convenes a dedicated Talent Review Meeting (TRM) at managerial level and chaired by the Executive Director with the objective to assess all staff's expression of interests for internal mobility vs the Authority's business needs); at organisational level (by means of internal publication on the organisation's intranet or internal transfer in the interest of the service as for instance a consequence of organisational change).

In 2025 17 staff benefited from internal mobility opportunities versus 13 in 2024. Additionally, mutually enriching internal professional developments have been agreed for 2 EBA staff members.

Mobility among agencies (inter-agency mobility)

The legal framework for inter-agency mobility is covered in the implementing rule governing the engagement and use of temporary agents under Article 2(f) of the Conditions of Employment of Other Servants of the European Union.

The EBA publishes vacancies externally; however, in its vacancy notices, the Authority states that the relevant provisions of the above-mentioned implementing rule will apply if the successful applicant from the external selection procedure is already a member of temporary staff pursuant to Article 2(f) in another EU agency. The successful candidate is therefore given the opportunity to move to the EBA while maintaining their grade, step as the preceding contract and career.

In 2024, 1 inter- agency vacancy was published and successfully concluded, while 1 EBA staff member was recruited via inter-agency mobility with another EU agency.

Mobility between the agency and other organisations

The EBA external Mobility Policy is an important component of the Agency's culture fostering staff's career development, knowledge sharing, and promoting a diverse and skilled workforce. It contributes to the advancement of the European financial sector and regulatory landscape by supporting increased cooperation between the EBA and external stakeholders, ultimately benefiting the broader European financial community. External mobility refers to the temporary assignment of staff from the EBA (*"the organisation of origin"*) to an external entity (*"the host organisation"*).

External mobility at the EBA is legally grounded in Articles 37, 38 of the SR and Article 51 of the CEOS and is based on openness, transparency and equal opportunities. It can take different forms: secondment in the

interests of the service, staff exchange, long-term mission to other organisations, ECB-SSM onsite inspection missions.

The EBA does not have any official posts in its establishment plan, and thus not able to transfer officials from the Institutions. Temporary agent positions at the EBA may be occupied by officials from other institutions or temporary agents from other agencies who take leave on personal grounds.

In 2025, 18 staff benefitted from external mobility opportunities (vs 14 in 2024) with different institutions such as ESMA, EIOPA, DG FISMA, ECB, MFSA, FMA and Bank of England.

C. Performance appraisal and reclassification

Implementing rules in place:

		Yes	No	If no, other implementing rules in place
Reclassification of TA	Model Decision C(2015)9560	X		
Reclassification of CA	Model Decision C(2015)9561	X		

The 2025 Performance Management Cycle has been successfully conducted in four steps: (1) the appraisal exercise (January – March) aiming at assessing staff's efficiency, ability and conduct (2) the Talent Review meetings (April-May) identifying the "talent production line" moving forward and evaluating staff expression of interests for internal and external mobility (3) the reclassification exercise (September) and (4) the mid-term review dialogue (July-September).

The reclassification exercise, after the comparison of merits meeting, resulted in 26 staff reclassified (18 TA/ADs, 2 TA/ASTs and 6 CAs) representing 48% female vs 52% male for TA and 33% female vs 67% male for CA with a good distribution across departments (1 1 in ACC, 1 in GEA, 6 in DART, 3 in ERA, 3 in ICC, 6 in OPER and 6 in PRSP). The overall TA appeal rate for eligible staff was 0.9% (2025, 1 appeal) vs 2.3% last year (2024, 3 appeals). There was also 1 CA appeal this year, i.e. 2.5% of eligible CA staff vs 0% in 2024. The exercise was concluded, in compliance with the rules, by the Joint Committee meeting examining the results and processes. The reclassification changes were reflected in the salaries of November 2025.

As part of the EBA's commitment to strictly respect the rates indicated in Annex IB of the SR, all reclassified staff met the indicative duration of career per type of post and grade.

Table - Reclassification of TA

Grades	2021 (N-4)	2022 (N-3)	2023 (N-2)	2024 (N-1)	2025 (N)	Actual average over 5 years*	Average over 5 years (According to decision C(2015)9563)
AD05	3.1	3.8	-	2.8	3.4	3.3	2.8
AD06	3.5	3.7	3.5	4.7	4.0	3.9	2.8
AD07	6.7	3.4	4.6	3.6	3.8	4.4	2.8
AD08	5.0	3.6	4.0	4.5	6.3	4.7	3.0
AD09	6.8	4.2	6.0	5.0	4.0	5.2	4.0
AD10	4.0	4.4	-	7.0	5.5	5.2	4.0
AD11	-	4.0	-	-	-	4.0	4.0
AD12	-	-	-	-	-	-	6.7
AD13	-	-	-	-	-	-	6.7

Grades	2021 (N-4)	2022 (N-3)	2023 (N-2)	2024 (N-1)	2025 (N)	Actual average over 5 years*	Average over 5 years (According to decision C(2015)9563)
AST1	-	-	-	-	-	-	3.0
AST2	-	-	-	3.0	-	3.0	3.0
AST3	-	-	-	4.3	5.5	4.9	3.0
AST4	-	-	-	-	-	-	3.0
AST5	-	-	-	-	-	-	4.0
AST6	-	-	-	-	5.0	5.0	4.0
AST7	-	-	-	-	-	-	4.0
AST8	-	-	-	-	-	-	4.0
AST9	-	-	-	-	-	-	N/A
AST10 (Senior assistant)	-	-	-	-	-	-	5.0
AST/SC1	-	-	-	-	-	-	4.0
AST/SC2	-	-	-	-	-	-	5.0
AST/SC3	-	-	-	-	-	-	5.9
AST/SC4	-	-	-	-	-	-	6.7
AST/SC5	-	-	-	-	-	-	8.3

* As figures for 2025 are now available, the averages have been updated to reflect years 2021 to 2025.

Table - Reclassification of contract staff

Function Group	Grade	Staff in activity at 1.01.2023 (N-2))	How many staff members were reclassified in 2024 (N-1)	Average number of years in grade of reclassified staff members *	Average number of years in grade of reclassified staff members according to Decision C(2015)9561
CA IV	17	3	-	-	Between 6 and 10 years
	16	2	-	-	Between 5 and 7 years
	15	9	1	4.3	Between 4 and 6 years
	14	16	3	3.2	Between 3 and 5 years
	13	6	2	3.3	Between 3 and 5 years
CA III	11	2	-	-	Between 6 and 10 years
	10	2	-	-	Between 5 and 7 years
	9	2	1	4.7	Between 4 and 6 years
	8	-	-	-	Between 3 and 5 years
CA II	6	-	-	-	Between 6 and 10 years
	5	-	-	-	Between 5 and 7 years
	4	-	-	-	Between 3 and 5 years
CA I	2	-	-	-	Between 6 and 10 years
	1	-	-	-	Between 3 and 5 years

* The table has been adjusted to reflect the erroneous reporting of some reclassifications in a different grade to what they should have been, which suggested that seniority had not been met. This is now no longer the case.

D. Gender representation

Promoting and supporting diversity and inclusion are core values embedded in the EBA's mission and organisation: EBA strives to value, ensure equal treatment and opportunities to everyone, irrespective who they are and what they believe in.

The EBA is fully committed to the [EU Commission's Gender Equality Strategy](#)³⁴ to make significant progress towards a gender-equal Europe by 2025 and the UN's ambitious global target of achieving gender equality and empowering women by 2030.

Since the last quarter of 2020, the EBA has been very active embedding gender equality in its culture. Within a few years only, the EBA has achieved a gender-equal leadership through different initiatives:

- Fostering an open and supportive culture: fighting discrimination (mandatory anti-harassment training), acknowledging and rewarding different leaderships, monitoring data/surveys with dedicated intranet/Teams' collaboration space, removing any gender-biased language and imagery in internal and external communications.
- Increasing managerial commitment with empowered champions in house and Staff Tool for managers to monitor and project gender and nationality staff evolution.
- Implementing Pool of talents diversification (gender balance in panels, advertise through diverse channels targeting female audience, train staff in panels to avoid bias, vacancy notice to be accompanied by video job ads with relevant focus on gender balance and inclusion, etc).
- Setting tone from the top and close steering with action plan (e.g.: meeting every week of a Gender Balance Working Group chaired by the Executive Director) and exchange with the Staff Committee.
- Offering development opportunities and exchange fora (mentoring programme, organisation of the third high-level conference of 15 November 2024 on Financial Services and Gender: Data, Trends & Progress in the EU and beyond).
- Developing interactive platform (EBA intranet/website) for promoting best practices, sharing knowledge (with testimonial videos, data, etc).
- Championing D&I initiatives at EUAN level (adoption of the EUAN charter on D&I, development of an EBA D&I toolkit for managers, Mental Health round table chaired by the EBA ED, etc).
- Providing work-life balance options (Hybrid working, childcare facilities, family disability support, return from maternity leave programme, etc.).
- Engaging closely with the European Institute for Gender Equality (EIGE) and key stakeholders (European Parliament FEMM committee, etc).

Increasing women's representation in decision-making positions at the Authority, helps building bridge in diversity resulting into a stronger EBA team working towards common values and goals. It also enriches the agency's culture opening new way of thinking, creativity, changing behaviour and challenging stereotypes.

It contributes overall to recognise, respect and value difference thus portraying unity in diversity.

It increases the sense of belonging making staff feel valued, engaged and empowered thus creating inclusion and buy-in to the EBA community's identity.

³⁴ https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/gender-equality/gender-equality-strategy_en.

Table 1 - Data on 31/12/2024 (Year N-1) of Statutory Staff (TAs and CAs)

		Temporary		Contract agents		Grand Total	
		Staff	%	Staff	%	Staff	%
Female	Administrator level	71	43.8%	24	46.2%	95	44.4%
	Assistant level (AST & AST/SC)	6	3.7%	7	13.5%	13	6.1%
	Total	77	47.5%	31	59.6%	108	50.5%
Male	Administrator level	80	49.4%	20	38.5%	100	46.7%
	Assistant level (AST & AST/SC)	5	3.1%	1	1.9%	6	2.8%
	Total	85	52.5%	21	40.4%	106	49.5%
Grand total		162	100.0%	52	100.0%	214	100.0%

Table 2 - Data on gender evolution over five years of the Middle and Senior Management

	2020 (N-5)		2024 (N-1)	
	Number	%	Number	%
Female managers	6	28.6%	10	41.7%
o.w. EBA Directors	1	20.0%	3	60.0%
Male managers	15	71.4%	14	58.3%

E. Geographical balance

Explanatory figures to highlight nationalities of staff (split per Administrator/CA FG IV and Assistant /CA FG I, II, III)

Table 1 - Data on 31/12/2024 (N-1) – statutory staff only (TAs and CAs)

Nationality	AD + CA FG IV		AST/SC- AST + CA FGI/CA FGII/CA FGIII		TOTAL	
	Number	% of total staff members in AD and FG IV categories	Number	% of total staff members in AST SC/AST and FG I, II and III categories	Number	% of total staff
Austria	3	1.5%	1	5.3%	4	1.9%
Belgium	3	1.5%	2	10.5%	5	2.3%
Bulgaria	3	1.5%	1	5.3%	4	1.9%
Croatia	3	1.5%	-	-	3	1.4%
Cyprus	3	1.5%	-	-	3	1.4%
Czech Republic	-	-	1	5.3%	1	0.5%
Denmark	1	0.5%	-	-	1	0.5%
Estonia	3	1.5%	-	-	3	1.4%
Finland	4	2.1%	1	5.3%	5	2.3%
France	26	13.3%	2	10.5%	28	13.1%
Germany	11	5.6%	1	5.3%	12	5.6%
Greece	11	5.6%	-	-	11	5.1%
Hungary	6	3.1%	-	-	6	2.8%
Ireland	3	1.5%	-	-	3	1.4%
Italy	40	20.5%	1	5.3%	41	19.2%
Latvia	3	1.5%	-	-	3	1.4%
Lithuania	4	2.1%	-	-	4	1.9%
Luxembourg	2	1.0%	-	-	2	0.9%
Malta	1	0.5%	-	-	1	0.5%
Netherlands	2	1.0%	-	-	2	0.9%
Poland	6	3.1%	4	21.1%	10	4.7%
Portugal	14	7.2%	-	-	14	6.5%
Romania	13	6.7%	2	10.5%	15	7.0%
Slovakia	3	1.5%	-	-	3	1.4%
Slovenia	2	1.0%	-	-	2	0.9%
Spain	19	9.7%	2	10.5%	21	9.8%
Sweden	1	0.5%	1	5.3%	2	0.9%
United Kingdom	5	2.6%	-	-	5	2.3%
TOTAL	195	100%	19	100%	214	100%

Table 2 - Evolution over five years of the most represented nationality in the Agency

Most represented nationality	2020 (N-5)		2024 (N-1)	
	Number	%	Number	%
Italian	34	17.3%	41	19.2%

F. Schooling

Agreement in place with the European School(s) of Paris ‘La Défense’

Contribution agreements signed with the EC on type I European schools	No
Contribution agreements signed with the EC on type II European schools	Yes
Number of service contracts in place with international schools:	10 agreements for primary and secondary education 19 agreements with nurseries

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 beside a full nursery and primary, a secondary cycle is opening gradually for the French section. Hence, the EBA is maintaining exceptionally its education contribution policy to certain staff members under certain conditions (e.g., if the child is in the final two years of the secondary cycle or the child attends a significant part of the school activities (equal to/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. The amounts exceeding the threshold will be borne by staff members.

School year 2024-2025:

Education system level	# children
Nursery: up to 4 years old	30
Maternelle: more than 4 years old and up to 6 years old	19
Primary: More than 6 years old and less than 11 years old	44
Secondary: More than 11 years old and less than 19 years old	64
Total	157

ANNEX VI: PROCUREMENT PLAN

The list below shows existing procurement procedures with an estimated value above EUR 15,000 that EBA expects to work on in 2026, including the targeted status by year end 2026. The possibility of joint procurement has been identified however it is not certain at this point in which procedures other entities would participate. It is EBA procurement policy to open up procurement procedures to other EU entities to the greatest extent possible. To this end, the EBA regularly updates its procurement planning on the EBA website and in the procurement portal on the EU Agencies Network website. The estimated value is the EBA ceiling and does not take account of volumes that would be required by other participating entities.

Service/supply	Procedure	Contract type	Estimated value (EUR)	Joint procurement	Target status
<i>Existing services/supply contracts</i>					
Water dispensers [depending on outcome of Lease procurement]	Negotiated	Framework (4 years)	20 000	No	Signed
Legal services – building lease	Negotiated	Framework (4 years)	80 000	No	Signed
Property advisor to assist with office space market prospection	Negotiated	Framework (4 years)	55 500	No	Signed
Digital Workplace Services	Open	Framework (4 years)	1 437 259	Yes	Signed
Bank guarantee	Negotiated	Direct	20 000	No	Drafting
Building lease	Exceptionally negotiated	Direct	40 000 000	No	Signed
Crypto-assets market data	Open	Framework (4 years)	150 000	No	Evaluating
Catering services	Open	Framework (4 years)	800 000	No	Tendering
Office fit-out: project management [depending on outcome of Lease procurement]	Open	Framework (4 years)	600 000	Possible	Drafting
Corporate support consultancy	Open	Framework (4 years)	2 000 000	Yes	Drafting
Environmental and EMAS consultancy	Open	Framework (4 years)	800 000	Yes	Signed
Building maintenance	Open	Framework (4 years)	550 000	No	Drafting

For contracts ending in 2026 or the first half of 2027 that were procured by other EU institutions, agencies, and bodies, it is assumed that the lead entity of the latest procurement will launch a procedure for successor contracts.

The EBA also foresees a small number of negotiated procedures with a value in the range 1-15 KEUR to be run in 2026.

ANNEX VII: ENVIRONMENT MANAGEMENT

Strategy

The EBA has an important role in supporting the European banking sector towards the objectives of transitioning to a more sustainable economy and mitigating risks stemming from climate change and broader environmental, social and governance factors.

Following its successful EMAS registration in 2022, the EBA is committed to continuously improving its environmental performance and reducing its carbon footprint.

In its Environmental Policy, the EBA committed to developing knowledge, finding technical solutions, and adjusting its organisation and behaviours, focusing on the following:

- Building capacity by strengthening knowledge, identifying technical solutions and adapting organisational structures and behaviours
- Reducing our greenhouse gas emissions, with a special focus on travel and energy
- Limiting our material impact through the implementation of circular economy practices, the use of electronic solutions, and green public procurement
- Implementing environmental, social and governance (ESG) considerations in policy making, risk assessment and supervisory convergence work in line with the EBA's tasks, the EBA's 2022 roadmap on sustainable finance and additional mandates received at that time.

The EBA set up key environmental indicators with concrete objectives to demonstrate the efficiency and effectiveness of its environmental management system. The Agency ensures compliance with all applicable local and European Union environmental regulations.

Moreover, the EBA adopted the *EU Agencies Network Charter on the reduction of greenhouse gas emissions and responsible environmental management* and endeavours to take all reasonable measures in achieving climate neutrality by 2030 within the scope of its activities and resources.

Environmental objectives and targets

Improvement area	No.	Strategic objective 3-year cycle 2025-2027
EMISSIONS	EM.1	Maintain the reduced levels of business travel (missions)
	EM.2	Increase green transport options for home-office commuting
	EM.3	Reduce energy consumption
	EM.4	Improve reporting
CAPACITY BUILDING	CB.1.	Set up environmental objectives for the majority of staff
	CB.2	Train staff and in-house consultants on EMAS, sustainable finance, and ESG risks
	CB.3	Introduce sustainability reporting
	CB.4	Digitalise and automate data collection
	CB.5	Engage and inform staff and stakeholders
	CB.6	Contribute to creating sustainable premises and workplaces
CIRCULAR ECONOMY	CE.1	Minimise purchases of physical items so as to limit our material impact
	CE.2	Buy to keep
	CE.3	Maximise the life cycle of products
	CE.4	Minimise the generation of waste
	CE.5	Dispose of items in an environmentally friendly manner
ESG	ESG.1.1	Deliver all ESG-related tasks included in the EBA's annual work programmes.

ANNEX VIII: BUILDING POLICY

Following its physical relocation from London, the EBA occupies four floors (24, 25, 26 and 27) of the office space in Tour Europlaza (Paris, France) and has operated from those premises since 3 June 2019. With the lease set to expire in May 2028, the EBA is preparing to launch a strategic project to assess its future office space needs. The EBA will consider all available options and potential synergies, with the objective of optimising costs while maintaining fully fit-for-purpose office space. In line with EU financial regulation, notably Article 272 and 273 governing building projects and related approval procedures – the process will begin in Q1 2026 with the submission of an Early Information Notice to the Budgetary Authority and the Council, making the formal start of the Building File preparation.

#	Building name and type	Location	Surface area (in m2)			Rental contract				Host country (grant or support)	
			Office space	Non-office	Total	Rent (EUR/year)	Duration of the contract	Type	Breakout clause Y/N		Conditions attached to the breakout clause (if applicable)
1	Tour Europlaza, High-rise, multi-tenancy building	Paris, France	3 995 ³⁵ square metres	1 408 ³⁶ square metres	Net office space: 5 403 square metres	EUR 561 ³⁷ per square metre Annual cost = EUR 3 030 416	9-year	Lease contract	Y	The contractual period for exercising the break out clause has elapsed.	French government provided EUR 1.5 million of financial support for lease and fit-out costs. Moreover, it contributes to up to EUR 7 million of building costs during the first nine years of the lease.

³⁵ Reception / Lobby 184m2; Meeting rooms - Visitors 533m2; Internal meeting rooms 346m2; Storage / Print rooms/ Corridors 695m2; Break out area visitors 192m2; Break out area staff 98m2; Open Plan (including individual offices) 1,947m2.

³⁶ 1,341m2 shared areas including lift banks, 67m2 archives (at basement level minus 4).

³⁷ Rent per sq. m including indexation (<https://www.insee.fr/fr/statistiques/serie/001617112>), as specified in the Lease Agreement, including cost of archives, car parking charges but the restaurant charges are not included.

ANNEX IX: PRIVILEGES AND IMMUNITIES

Agency privileges	Privileges granted to staff	
	Protocol of privileges and immunities/diplomatic status	Education/day care
Refunds of value added tax (VAT) for purchases of goods and services for the agency, including vehicles	<ul style="list-style-type: none"> • Importation of personal effects including motor vehicles free of customs duty and VAT • Special vehicle registration • A special residence permit 	<p>An Accredited European School was created by the French State in La Défense, Paris. The Mandate and Service Agreement between the EBA and the Commission was concluded in November 2020, facilitating the payment of an EU financial contribution towards the Accredited European School Paris La Défense. The Accredited European School grants free-of-charge priority enrolment for the children of the EBA staff. The Accredited European School then grants free-of-charge priority enrolment for the children of EBA staff.</p> <p>Plans to move the Accredited European School Paris La Défense to a single purpose-built site in 2028 have been postponed to a potential delivery date in 2032 pending the outcome of further studies. This prevents the Accredited European School from expanding to accommodate the three linguistic sections normally required for accreditation and to cater for all future children of EU staff employed in Paris. The EBA is working with ESMA and the French authorities to ensure that the school has suitable long-term premises on an accelerated timeline, and ensuring continuity of education for existing children.</p> <p>For children who do not attend this school, education allowances are determined and paid when due.</p>

ANNEX X: 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 2022.³⁸

The EC 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 COVID19 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 EC 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 joint criteria published on their websites³⁹). 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 the EBA Chairman attends at the EPs ECON committee; as well as by
- The European Court of Auditors, the EC’s Internal Audit Services, and the yearly external financial audits; and through
- 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.

³⁸ https://finance.ec.europa.eu/system/files/2022-05/220523-esas-operations-report_en.pdf.

³⁹ 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)’ (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).

ANNEX XI: ORGANISATIONAL MANAGEMENT AND INTERNAL CONTROLS

Organisation management

The EBA is represented by its Chairperson who is responsible for preparing the work of the BoS. This includes setting the agenda to be adopted by the BoS, convening meetings and tabling items for decisions, and chairing the meetings. The chairperson also proposes the agenda of the MB and chairs its meetings.

The Executive Director manages the Authority and prepares the work of the MB.

Since 1 June 2021, following an internal reorganisation, the EBA's management team consists of five directorates and 17 unit:

- Five directorates:
 - **Prudential Regulation and Supervisory Policy**, consisting of three units: *Liquidity, leverage, loss absorbency and capital; Risk-based metrics; and Supervisory review, recovery and resolution.*
 - **Innovation, Conduct and Consumers, consisting of three units:** *Digital Finance; Conduct, Payments and Consumers; and AML/CFT.*
 - **Economic and Risk Analysis**, consisting of three units: *Economic Analysis and Impact Assessment, Risk Analysis and Stress Testing; and ESG Risks.*
 - **Data Analytics, Reporting and Transparency**, consisting of two units: *Statistics; and Reporting and Transparency.*
 - **Operations**, consisting of four units: *Corporate support; Finance and procurement; Human resources; and Information technology.*
- Two units - *Legal and Compliance* and *Governance and External Affairs* - and the *Accounting function* report directly to the Executive Director.

An additional directorate – **DORA Joint Oversight**, was established in October 2024 as a joint ESAs department reporting to the three Executive directors. It initially consists of two units.

The management team oversees the EBA's activities and ensures that control standards are met. It meets on a weekly basis in various formats. The EBA's management plays a key role in fostering the implementation of the anti-fraud strategy and policy. The Ethics officer supports the EBA's management in these tasks with the support of a dedicated Risk and Compliance team tasked with new responsibilities in the risk and compliance areas, in particular ethics, data protection, risk management, and anti-fraud, and from 2025 artificial intelligence compliance and environmental management coordination.

Internal control

The EBA's internal control framework applies to all the agencies' activities, financial as well as non-financial. Its overall objective is to ensure that the organisation achieves its business, operational and financial objectives respecting rules and regulations. It supports sound decision-making, taking into account risks to the achievement of these objectives and reducing them to acceptable levels through cost-effective controls. The framework supplements the Financial Regulation and other applicable rules and regulations and is aligned on the EC's standards which are themselves based on the international standards set by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

The internal control framework consists of five internal control components and 17 principles based on the COSO 2013 Internal Control-Integrated Framework. The five internal control **components** are: i) the control environment; ii) the risk assessment; iii) the control activities; iv) information and communication; and v) monitoring activities.

To facilitate the implementation of the internal control framework and management's assessment of whether or not each component is present and functioning, each component consists of several principles, which specify the actions required for internal control to be effective. For each principle, characteristics are defined to assist management in implementing internal control procedures and in assessing whether or not the principles are present and functioning. For each principle, baselines are set, expressed in terms of indicators, which are quantitative whenever it is possible and used to assess the EBA internal control system on an annual basis.

While compliance remains an important requirement, the future objectives are focused on assessment, monitoring of the activities and optimisation of controls.

Risk management

The EBA revamped its risk management (RM) framework in 2022 with the design and implementation of an enterprise risk management (ERM) system aligned with the COSO 2017 ERM framework, adopting a new risk management policy, a risk appetite framework incorporating a risk appetite statement, and the initial set of strategic risks identified under the updated framework. The EBA will continue to carry out its regular annual cycle of comprehensive RM assessment of its operations, developing and implementing action plans where strategic risks fall outside the risk tolerances adopted (and reviewed annually), reviewing the strategic risk register and continuing to identify and evaluate additional potential risks that could materialise within the organisation.

This underpins an overview of aggregated risks and allows management to focus on the areas that pose a greater risk (i.e., significant and/or material) to the EBA's Work Programme and wider operations. This is carried out at the strategic level.

These processes will be continuously reviewed and updated through 2026 to 2028, putting the EBA in a better position to enhance the alignment, integration, and coordination of risks among its functions and business units, which should lead to it being embedded in the strategic planning process.

Anti-fraud & ethics

The EBA's new Anti-Fraud Policy and Strategy, adopted in 2025, provides the foundation for all activities that the EBA carries out in respect of fraud risks. The policy is based on four main objectives, namely a) prevent, b) detect and investigate, c) recover, mitigate and respond, and d) exploit.

The strategy sets out the following objectives for 2025-2027: maintaining a high level of ethics and anti-fraud culture; continuing to ensure the absence of conflicts of interests of staff; clarifying the conflict of interest rules and adjusting them to new tasks; exploring new ways of reporting fraud; enhancing certain current processes/systems to reduce fraud; maintaining exchange of best practices and joint-risk-response with agencies with a similar fraud profile.

An anti-fraud risk assessment will be carried out in 2027 to identify activities and processes that could result in fraud and evaluate them to find out the level of fraud risk that they carry. This will lead to development of a new anti-fraud strategy, in particular to revise the objectives and set out a new action plan to address any material or significant risks identified.

Anti-fraud training will continue to be delivered in conjunction with the EBA's annual mandatory ethics training programme.

The EBA's ethics guidelines and framework will be kept under review in particular to take into account the developments in the additional oversight and supervisory roles accorded to the EBA through DORA, MiCA, and EMIR (IMMV) and the particular ethical issues to which these new tasks may give rise as they are implemented.

Data protection and artificial intelligence governance

The EBA will continue to ensure effective implementation of data protection requirements applicable to it through its system of delegated data controllers, data protection coordinators within business areas and Data Protection Officer supported by the Risk & Compliance team. The EBA will continue to develop and improve its internal arrangements for processing personal data and for reviewing those processing operations. Ongoing developments in IT use of cloud technology and use of artificial intelligence will require ongoing monitoring of trends, technologies and data protection risks arising from them. Implementation of DORA and MiCA and commencement of oversight, direct supervision and investigation activities are also expected to be a focus of activity.

ANNEX XII: PLAN FOR GRANT, CONTRIBUTION AND SERVICE-LEVEL AGREEMENTS

	General information ¹					Financial and HR impacts				
	Actual or expected date of signature	Total amount	Duration	Counterpart	Short description		2025 Year N	2026 Year N+1	2027 Year N+2	2028 Year N+3
Grant agreements										
1. XXX						Amount				
						Number of CA				
						Number of SNEs				
2. XXX						Amount				
						Number of CA				
						Number of SNEs				
....						Amount				
						Number of CA				
						Number of SNEs				
Total grant agreements						Amount	0	0	0	0
						Number of CA	0	0	0	0
						Number of SNEs	0	0	0	0
Contribution agreements										
1. XXX						Amount				
						Number of CA				
						Number of SNEs				
2. XXX						Amount				
						Number of CA				
						Number of SNEs				
....						Amount				
						Number of CA				
						Number of SNEs				
Total contribution agreements						Amount	0	0	0	0
						Number of CA	0	0	0	0
						Number of SNEs	0	0	0	0

	General information ¹					Financial and HR impacts				
	Actual or expected date of signature	Total amount	Duration	Counterpart	Short description		2025 Year N	2026 Year N+1	2027 Year N+2	2028 Year N+3
Service-level agreements										
1. EU Supervisory Digital Finance Academy	14/09/2022	1 079 515	Four years	SG REFORM	Providing support to 20 Member States to strengthen supervisory capacity in the area of innovative digital finance	Amount	257 657			
						Number of TA	1			
						Number of CA	0.75			
						Number of SNEs				
2. EU Supervisory Digital Finance Academy	28/10/2025	715 340	Four years	SG REFORM	Providing support to 20 Member States to strengthen supervisory capacity in the area of innovative digital finance	Amount	60 582	233 354	244 218	177 186
						Number of CA	0.25	2	2	2
						Number of SNEs				
....						Amount				
						Number of CA				
						Number of SNEs				
Total service-level agreements						Amount	318 239	233 354	244 218	177 186
						Number of TA	1			
						Number of CA	1	2	2	2
						Number of SNEs	-	-		
TOTAL						Amount	318 239	233 354	244 218	177 186
						Number of TA	1	-	-	-
						Number of CA	1	2	2	2
						Number of SNEs	-	-	-	-

1. For on-going agreements, please provide the requested general information. For expected agreements, please provide the information available. When the information is not known, please put "not known".

ANNEX XIII: STRATEGY FOR COOPERATION WITH THIRD COUNTRIES AND INTERNATIONAL ORGANISATIONS

Strategy for cooperation with third countries

In recent years, EBA's engagement in the assessment of the equivalence of third countries has increased, both with regard to the regulatory/supervisory framework for preferential treatment of certain exposures and for the confidentiality and professional secrecy regime of third-country authorities, to facilitate their attendance of EU supervisory colleges and AML/CFT colleges. Confidentiality assessments for DORA/MiCA purposes will help to establish international cooperation with third countries on CTPP oversight and ART/EMT supervision. Moreover, the EBA monitors third-country regulatory and supervisory frameworks on an on-going basis and uses its work on equivalence and the development of cooperation agreements to deepen its relationships with supervisory authorities from non-EU countries. Monitoring activities focus on relevant regulatory and supervisory developments and market developments in these countries and their implications for financial stability, market integrity, investor protection and the functioning of the internal market. As part of its engagement with third countries, the EBA is also expanding its relationship with neighbouring countries and potential candidates to EU enlargement and provides its support to these third countries where needed.

Strategy for cooperation with international organisations.

The 2020 ESAs review encouraged the EBA to intensify its cooperation with international organisations by representing 'the interest of the Union in the international fora'.

BASEL COMMITTEE ON BANKING SUPERVISION (BCBS)

The BCBS: The BCBS is the primary global standard-setter for the prudential regulation of banks and provides a forum for bank supervisors to cooperate.

The EBA at the BCBS: The EBA has an observer role and participates in the meetings of the Committee and of its parent body (Governors and Heads of Supervision), and those of relevant working structures. To best represent the interest of the EU and its Member States, European participants, including the European Commission and the EBA given their regulatory roles in the EU, strive to coordinate their positions.

The EBA's main objectives at the BCBS: To ensure a fair representation of EU interests in the shaping of global standards and to draw on best international practices and information for setting EU regulation.

FINANCIAL STABILITY BOARD (FSB)

The FSB: The Financial Stability Board (FSB) is an international body that monitors and makes recommendations about the global financial system.

The EBA at the FSB: The EBA is a member of the Resolution Steering Group of the FSB (ReSG), the primary global forum for the development of standards and guidance for resolution regimes, and for recovery/resolution planning/execution for systemically important financial institutions (SIFIs), including banks, insurers and financial market infrastructures. It seeks to develop, issue, and maintain standards and guidance, monitor resolvability and crisis preparedness, build trust between home and host authorities, and serve as a knowledge-sharing forum for resolution authorities and other authorities with a role in crisis management.

In addition to its role in the Steering Group, the EBA participates in the Cross Border Crisis Management group (CBCM), one of the three main sub-groups of ReSG (alongside corresponding groups for financial market infrastructures and insurance).

The EBA's main objectives at the FSB: The EBA shares its direct experience of policy development and practices in European recovery and resolution planning for the purpose of developing global policy and monitoring compliance with international standards. It coordinates closely with the EC and the Single Resolution Board. The core objective is to ensure that post-GFC reforms are developed and implemented to deliver high-quality crisis management structures with the objective of minimising disruption to the financial system and protecting taxpayers' interests.

INTERNATIONAL MONETARY FUND (IMF)

The IMF: The International Monetary Fund ensures the stability of the international monetary system, the system of exchange rates and international payments that enables countries to transact with each other.

The EBA's main objectives with the IMF: The EBA provides data on the euro area to the IMF for its annual Article IV consultation on the euro area, which assesses the financial health of the euro area, its current development and economic forecasts. The EBA also contributes to the Financial Sector Assessment Program (FSAP) of the Euro Area. As well as strong cooperation on the aforementioned publication, the EBA's top management holds recurrent bilateral meetings with the IMF's top management for European affairs to discuss EU policies and economic issues.

ANNEX XIV: PEER REVIEW WORK PLAN UNTIL 2027

In accordance with Article 30 (8) of the EBA Regulation the EBA publishes its peer review work plan for the coming two years – as published in the Work programme 2026. In case of urgency or unforeseen events, the EBA may substitute or decide to carry out additional peer reviews.

Peer reviews

- Commencing in 2026

Crypto-asset white papers: NCAs' practices in relation to notified crypto-asset white papers by EMT issuers under Article 48(1)(b) MiCA, compliance with the requirements regarding crypto-asset white papers, including the conditions for redemption. This includes a quality review of the white papers and ensuring investors are protected with all necessary information regarding their redemption rights.

Resolution: First EBA peer review looking at the activities of resolution authorities with a view to assessing and strengthening the outcomes of aspects of resolution planning.

- Commencing in 2027 (2 of the following topics)

- Liquidity supervision
- Home-host cooperation, e.g. information-sharing and contributions in supervisory colleges and activities
- Third country branch supervision
- ESG risk, e.g. integration of climate risk into supervisory review processes
- Investment firm supervision, e.g. classification of type of investment firms or market risk requirements, establishment and functioning of colleges
- DORA non-oversight, e.g. incident reporting supervisory response

Follow-up peer reviews

- Commencing in 2026

- Follow-up of recommendations in [Peer review on the supervision of creditors' treatment of mortgage borrowers in arrears under the Mortgage Credit Directive](#)
- Follow-up of recommendations in [Peer review on the EBA Guidelines on the application of the definition of default](#)
- Follow-up of recommendations in [Peer review on tax integrity and dividend arbitrage schemes](#) (this will cover prudential follow-up measures only following transfer of AML/CFT tasks to AMLA)

- Commencing in 2027

- Follow-up of recommendations in [Peer review on the application of proportionality in SREP](#)
- Follow-up of recommendations in [Peer review on the performance of stress tests by deposit guarantee schemes](#)
- Follow-up of recommendations in Peer review on gender diversity.



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