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# SINGLE PROGRAMMING DOCUMENT - DRAFT

## YEARS 2027-2029

EBA/REP/2026/03

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## FOREWORD

This single programming document (SPD) sets out the EBA's planning of activities and corresponding resource requirements at a three-year horizon. 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 2027, the EBA should be well advanced in a new cycle started in 2025-2026, after several years of negotiations and preparations of new legislations and responses to shocks. This includes working on the implementation of new rules for banking and payment and carrying out 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 (EMIR3).

Secondly, the EBA will be tackling new challenges arising from the financial risks and vulnerabilities outlook. This is due to a fast-evolving geo-political and geo-economical context, as well as to the important transformations arising within the financial sector, with environmental and technological transitions. This will require new approaches for assessing risks, preserving financial stability and protecting consumers.

Last but not least, the EBA will be supporting the co-legislators. Their priorities for the financial sector have been reflected in this SPD which strives to combine the need to preserve the resilience built in the financial sector with that of fostering the latter's capacity of adequately funding the European economy.

Against that background, the EBA will be focusing on three priorities in years 2027-2029, in the continuation of the direction which is being initiated in 2026: 1) evolving its rulebook, so that it contributes to an efficient, resilient and sustainable single market for banking and financial services; 2) carrying out risk assessments, to adequately support effective risk 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 close 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 built around seven overarching activities, and rolling out an HR strategy that nurtures staff motivation and satisfaction. In recent years, it could thus deliver its annual work programmes, including substantial new requests, without having received new resources.

In 2026-2028, selected reinforcements were requested to fill some critical gaps but these were not granted. For years 2027–2029, some reduced, targeted (in part temporary) reinforcements are again being requested, to help overcome constraints while strictly limiting the impact on contributions from the EU and national competent authorities which would stay almost flat in real terms compared to their level in 2025.

François-Louis Michaud  
EBA Executive Director

## LIST OF ABBREVIATIONS

ACP	EBA Advisory Committee on Proportionality	GL	Guidelines
AML/CFT	Anti-money laundering/countering the financing of terrorism	HR	Human resources
AMLA	Anti-money laundering authority	ICT	Information and communication technology
AI	Artificial intelligence	IFD/IFR	Investment Firm Directive and Regulation
ART	Asset-referenced token	IFRS	International Financial Reporting Standard
AST	Assistant	IMF	International Monetary Fund
BCBS	Basel Committee on Banking Supervision	IMM	EMIR Initial margin models
BoS	Board of Supervisors	IRB	Internal ratings-based
BRRD	Banking Recovery and Resolution Directive	IRRBB	Interest rate risk in the banking book
CA	Competent authority	IT	Information technology
CRD	Capital Requirements Directive	ITS	Implementing technical standards
CRR	Capital Requirements Regulation	JC	Joint Committee
CSDR	Central Securities Depository Regulation	KPI	Key performance indicator
CTPPs	Critical ICT Third-Party providers	LCR	Liquidity coverage ratio
DGSD	Deposit Guarantee Scheme Directive	LFS	Legislative financial statement
DORA	Digital Operational Resilience Act	MFF	Multi-annual financial framework
EBA	European Banking Authority	MiCA	Markets in Crypto-assets Regulation
EC	European Commission	ML/TF	Money laundering / Terrorism financing
ECA	European Court of Auditors	MREL	Minimum requirement for own funds and eligible liabilities
ECB	European Central Bank	NCA	National competent authority
EFIF	European Forum of Innovation Facilitators	NPL	Non-performing loan
EFTA	European Free Trade Association	PSD/PSR	Payment Services Directive / Regulation
EIOPA	European Insurance and Occupational Pensions Authority	Q&A	Questions and answers
EMAS	Eco-Management and Audit Scheme	RTS	Regulatory technical standards
EMIR	European Market Infrastructure Regulation	SA	Standardised approach
EMT	E-money tokens	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

## 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](#))<sup>1</sup>

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](#)<sup>2</sup> 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 made 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 collections<sup>3</sup> and a European Single Access Point (ESAP) to company data for investors. The EC's 2026 work

<sup>1</sup> [https://commission.europa.eu/topics/financial-services-and-banking\\_en](https://commission.europa.eu/topics/financial-services-and-banking_en)

<sup>2</sup> [https://commission.europa.eu/document/download/e6cd4328-673c-4e7a-8683-f63ffb2cf648\\_en?filename=Political%20Guidelines%202024-2029\\_EN.pdf](https://commission.europa.eu/document/download/e6cd4328-673c-4e7a-8683-f63ffb2cf648_en?filename=Political%20Guidelines%202024-2029_EN.pdf)

<sup>3</sup> [https://ec.europa.eu/info/publications/211215-supervisory-data-strategy\\_en](https://ec.europa.eu/info/publications/211215-supervisory-data-strategy_en)

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 framework<sup>4</sup> (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.

<sup>4</sup> 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 <sup>5</sup> 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 Payment Accounts directives, work in this area may resume towards 2028.
Investment firms (to be seen)	The EBA stands ready contribute to a review of the IFD/R should the EC follow-up on the advice the authority provided in 2025.
<b>Horizontal legislation</b>	
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 <sup>6</sup> (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.

<sup>5</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0592>.

<sup>6</sup> <https://eur-lex.europa.eu/eli/reg/2023/2841>.



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**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.

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**3) New roles**


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**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 2027-2029 time horizon.

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**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 2027-2029 period. The EBA stands also ready to support the EC for its reports preparing the MiCA review.

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**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 over the 2027-2029 time horizon.

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**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.

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**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.

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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, NBFi...) 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 (2027-2029)

### 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.<sup>7</sup>
4. After starting a new cycle of its activities in 2026, following several years of negotiations and preparations for new legislations, the EBA continues in 2027-2029 on the full implementation of new rules, both adopted (CRDVI/CRRIII, DORA, MiCA, EMIR) as well as those under negotiation (PSR/PSD, BRRD, DGSD, ESUI...). 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 2027-2029.

#### Three priorities for 2027-2029



6. The priorities and work programme may need to be refined as the objectives and initiatives of the European legislators evolve and upon the guidance of the EBA's Board of Supervisors in 2026. 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 for banking and financial services

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 for banking and financial services. After more than a decade of ex ante harmonisation work, more importance will be given to ex-post

<sup>7</sup> 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.

harmonisation. 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 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 are being 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.<sup>8</sup> 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 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)<sup>9</sup> 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

<sup>8</sup> <https://www.eba.europa.eu/publications-and-media/press-releases/eba-publishes-roadmap-implementation-eu-banking-package>.

<sup>9</sup> <https://www.esrb.europa.eu/pub/pdf/recommendations/esrb.recommendation251020.en.pdf?469ebdea563699c20de7008b8a997e0>

the EC in their interim and final reports to the European Parliament and Council by 30 June 2027. 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 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 Instant Payment 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 <sup>10</sup> )	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 2027	Target 2028	Target 2029
A1	80%	90%	90%	TBC
A2	80%	85%	90%	TBC
Baselines are 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.				

<sup>10</sup> 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 moreover develops tools to support competent authorities in their daily tasks: IFRS 9 benchmarking report, 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. The TFE report included a number of recommendations of relevance in this context, which included: reflecting 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 (recommendation 11); but also increasing consistency across risk management concepts and expectations across regulated areas (recommendation 12).

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, testing the application of the recovery and resolution toolbox in the cross-border context.
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 used across the different areas of its work.

#### KPIs

	Indicator (and type)	Weight	Short description
<b>A</b>	Convergence-enhancing initiatives	70%	Identify and implement supervisory convergence tools across the EBA's activities (e.g. supervisory priority-setting and monitoring, supervisory colleges and handbook, statements and opinions, case studies, simulation exercises, monitoring and benchmarking, mediation, breach of Union law assessments)
<b>B</b>	Peer reviews	30%	Conclude 6 peer reviews and 6 peer review follow-ups

	Baseline	Target 2027	Target 2028	Target 2029
<b>A</b>	1 initiative	> 1 initiative	> 1 initiative	> 1 initiative
<b>B</b>	2 peer reviews + 3 follow-up peer reviews (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 risk analysis, supervision and oversight

25. 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, 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 NBFIs 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 greater consideration will be given to tackling cross-sector topics such as climate-change related risks –transition and physical – or NBFIs leveraging off 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
<b>A</b>	Key milestones to upgrade of ST methodology and development of a hybrid model	70%	1. Implement revised EU-wide stress test framework for the 2027 exercise. 2. Further develop the stress test framework (e.g. to allow more top-down elements)
<b>B</b>	Design climate stress test module	30%	1. Implement climate module as part of the regular 2027 stress test. 2. Integrate climate risk as part of the regular stress test beyond 2027. 3. Preparatory work on long-term climate scenario analysis starting from mid-2027.

Indicators measure contribution to assessment of risks in financial sector and to green transition.

	Baseline	Target 2027	Target 2028	Target 2029
<b>A</b>	Work plan	1. 100%	2. 70% (preparation for 2029 exercise).	2. 100%
<b>B</b>	Work plan	1. 100% (of climate stress test module)	2. 70% (preparatory work on the integration of	2. and 3. 100%



climate risk as part of  
regular stress test,  
including 3. Work on long-  
term climate scenario  
analysis)

**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 (avoiding redundancies) 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. 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
<b>A</b>	Performance of oversight of CTPPs	DORA	50%	Implementation of the oversight of CTPPs jointly with EIOPA and ESMA.
<b>B</b>	Performance of supervision activities (Outputs / Results)	MiCA	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 2027	Target 2028	Target 2029
<b>A</b>	CTPPs oversight	Fully-fledged oversight activities; first batch of	Objectives in the oversight to reduce	TBC

		remediations achieved by CTPPs	interdependencies and systemic ICT risks	
<b>B</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	TBC
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 also in years 2027-2029. 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 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
<b>A</b>	Timeliness of reporting (%)	25%	EUCLID: Accepted modules/ Expected modules, by remittance date +10 working days (wd)
<b>B</b>	Completeness of reporting (%)	25%	EUCLID: Not reported/ Expected templates, by remittance date +10 wd.
<b>C</b>	Accuracy of reporting (%)	25%	EUCLID: Failed error rules/ Total of error rules executed per file, by remittance date +15 wd.
<b>D</b>	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 2027	Target 2028	Target 2029
<b>A</b>	>95%	>95%	>95%	>95%
<b>B</b>	<0.1%	<0.1%	<0.1%	<0.1%
<b>C</b>	<0.1%	<0.1%	<0.1%	<0.1%
<b>D</b>	<15	<15	<15	<15
Baselines: Timeliness, completeness, and accuracy results are based on largest institutions only and calculated considering the main supervisory modules. Baseline has 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, 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 (i.e. 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 as appropriate 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, EIF, SDFA, events); iii) training (SDFA).	
	Baseline	Target 2027	Target 2028	Target 2029
A	>1 initiative	3 initiatives 90 % reviewed materials for SDFA	> 3 initiatives 100 % reviewed materials for SDFA	> 3 initiatives:
Baseline: Findings of initiatives (i) to (iii) enable assessment of 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	
<b>A</b>	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 2027	Target 2028	Target 2029
<b>A</b>	>1 initiative	2 initiatives	> 1 initiative	> 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 2027-2029

48. The outlook for human and financial resource needs for years 2027-2029 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 the 2021-2027 multi-annual financial framework (MFF).

## 2.1. Overview of the past and current situation

### Human resources

49. Excluding the 8 posts transferred to AMLA by end of 2025 and without DORA, MiCA and EMIR fee-funded positions, the EBA achieved a 97% occupancy rate for its 270 posts in 2025. From 2026: i) the number of the posts funded by the EU and member states contributions is reduced by 8 (4 TA/AD7 and 4 CA FG/IV being transferred to AMLA), ii) the number of fee funded posts for DORA/MiCA and EMIR remain unchanged, bringing the total number of posts to 261. Additionally, under the new agreement for SDFA, SG REFORM will fund 2 CA/FG IV posts instead of 1 TA/AD6 and 1 CA/FG IV.

STAFF	2025 Year N-1		2026 Year N
ESTABLISHMENT PLAN POSTS	Authorised budget 2025	Actually filled as of 31/12/2025*	Occupancy rate +
Administrators (AD)	151	145	99%
Assistants (AST)**	11	11	100%
Assistants/Secretaries (AST/SC)	-	-	-
SDFA***	1	1	100%
MiCA****	22	2	(100%)
DORA*****	8 (6AD+2AST)	6	(75%)
EMIR*****	3	-	-
AMLA			-4
<b>TOTAL EP POSTS</b>	<b>196</b>	<b>165</b>	<b>86% (99%)</b>
EXTERNAL STAFF	FTEs in the authorised budget	Actual FTEs as of 31/12/2025 N-1	Execution rate +
Contract Agents (CA)	50	45	98%
SDFA***	-	-	-
MiCA****	2	2	100%
DORA*****	2	0	(0%)
AMLA			-4
Seconded National Experts (SNE)*****	19	16	84%
EMIR *****	1	-	-
<b>TOTAL EXTERNAL STAFF</b>	<b>74</b>	<b>63</b>	<b>90% (94%)</b>
<b>TOTAL STAFF</b>	<b>270</b>	<b>228</b>	<b>87% (97%)</b>

+ Percentages are calculated without the 8 posts transferred to AMLA (4 TA + 4 CA); the percentages in brackets are showing the real occupancy rate without the MiCA/ DORA / EMIR fee-funded posts

\* 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:

2025: 1 TA/AD6 since 2023 and 1 CA/FG IV (CA not shown above as per EC requirements).

2026, as per the new SLA with SG REFORM: 2 CA/FG IV which are not shown above as per EC requirements.

\*\*\*\* 22 TA/AD MICA posts (of which 20 fee funded posts) and 2 CA/FG IV EU/NCA funded for indirect supervision tasks for MiCA.

\*\*\*\*\* A total of 18 ADs 6 ASTs and 6 CA 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, 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 to be recruited in 2026.

\*\*\*\*\* 7 cost free SNEs hosted at EBA at the beginning of 2026.

## Financial resources

50. The EBA achieved a 98.4% execution of its 2025 budget, which for the first time included appropriations resulting from fee revenue. Based on the 2021-2027 MFF, the 2026 budget was adopted by the BoS on 17 December 2025 for a total amount of EUR 64 395 247 including contributions from the French government, SG REFORM, and revenue from fees to be levied.

EXPENDITURE by budgetary title and chapter	Executed budget 2025	Budget 2026
<b>Title 1 Staff expenditure</b>	<b>39 871 183</b>	<b>42 629 558</b>
11 Salaries and allowances	34 579 284	36 207 712
- of which establishment plan posts	27 813 459	29 262 018
- of which external staff	6 765 825	6 945 694
11.33 Employer's pension contribution	3 422 963	4 023 193
12 Expenditure relating to staff recruitment	172 490	332 831
13 Mission expenses	88 882	136 330
14 Socio-medical infrastructures	786 492	889 752
15 Training	296 168	347 226
16 External services	392 085	526 841
17 Receptions and events	132 819	165 673
<b>Title 2 Infrastructure &amp; operating expenditure</b>	<b>12 133 340</b>	<b>14 074 057</b>
20 Rental of buildings and associated costs <sup>11</sup>	4 469 007	5 206 577
21 Information and communication technology	6 834 180	7 837 086
23 Current administrative expenditure	504 628	727 859
27 Information and publishing	325 525	302 534
<b>Title 3 Operational expenditure</b>	<b>7 255 571</b>	<b>7 691 633</b>
31 General operational expenditure	1 854 298	3 027 597
32 IT expenditure for operational purposes	5 401 273	4 664 036
33 Oversight expenditure	p.m.	-
<b>TOTAL EXPENDITURE</b>	<b>59 260 094</b>	<b>64 395 247</b>

Note: The 2025 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 2024.

## 2.2. Outlook for the years 2027-2029 (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).

<sup>11</sup> Includes expenditure funded by the French government contribution.



## Growth of existing tasks

52. EBA's work will grow in nine main areas (see also Section 1 General context and their forward-looking resourcing in Section 2.5 Resource programming 2027-2029).

<b>CRD/CRR</b>	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.
<b>CMDI</b>	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.
<b>Payment services and open finance</b>	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.
<b>ESG</b>	<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 will continue developing the 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>
<b>Stress testing</b>	<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 risk<sup>12</sup> 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 and will incorporate it in its regular stress-test exercise. Finally, there will be discussions about developing stress-testing for NBFIs, which could benefit from the EBA expertise.</p> <p>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</p>

<sup>12</sup> <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>



	analytics skills. This will require an analysis of existing reporting with a view to complementing or rebalancing it.
<b>Reporting</b>	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.
<b>Regulatory and supervisory cooperation</b>	New legislations and cross-cutting challenges (conduct, cyber, ESG, NBFi...) 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
<b>SDFA</b>	The EC SG Reform-sponsored EU SDFA programme <sup>13</sup> started in 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.
<b>Ad hoc requests</b>	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, 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 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 around seven overarching activities: 1) policy

<sup>13</sup> [https://ec.europa.eu/info/sites/default/files/b5\\_-\\_digital\\_finance\\_academy.pdf](https://ec.europa.eu/info/sites/default/files/b5_-_digital_finance_academy.pdf).

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 has intensified 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 reorganise 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) together with ESMA and EIOPA for DORA. 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 (decarbonising operations and implementing circular economy principles see also Annex VII).

## Modern tools

58. **EBA's Horizon 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 optimising 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 brings 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 2025, the EBA was lead agency on three inter-institutional procurement procedures, with a total value estimated at EUR 8 114 913 in which a total of 27 other European Union agencies, institutions and bodies 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 2025, 76 % of the EBA's 180 framework contracts in force (resulting from 80 procurement procedures) were procured by other EU entities – see table below.

Procurements	Lead:	EBA	COM	Other agencies	Other	Total
Procurement procedures completed by Q4/2025		3	11	3	1	18
Framework contracts		43	88	33	16	180

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 approaches for a number of cross-cutting areas, such as financial risk assessments, ESG, financial conglomerates. A recent achievement was the Fit-for-55 stress-test carried out under its aegis. It will prove instrumental in coming years to tackle topics like ESG again, NBFIs, ESIUs, 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 optimising 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 flow rate 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 2027-2029

### Human resources

#### Number of staff requested

76. The outlook for human and financial resource needs for years 2027-2029 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 is foreseen: AD5, AD7, AD9, AD12 and 2 AST4 senior assistant. The EBA together with EIOPA and ESMA requested the conversion of 5 ASTs and 6 CA/FGIV into TA/AD.
  - 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.
- SDFA is extended through a new SLA, with 2 CA/FG IV as from 2026 funded by SG REFORM (whereas under the previous SLA 1 TA/AD6 and 1 CA/FG IV were allocated).

### Overall staff request

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, from a practical perspective, resources are not fully fungible. After having exhausted all possibilities for efficiency gains, a gap in available resources remains during the period 2027 to 2029.
79. In 2027, the EBA therefore reiterates its request of additional posts set out in the previous draft SPD – albeit in an adjusted form: 4 new permanent posts and 3 new temporary posts for three years.
80. With the reduction of 8 posts that are transferred to AMLA at the end of 2025, the request – if accepted – results in a temporary increase of posts by 3 for years 2027-2029 compared to the situation in 2025, and then to a decrease of posts by 2 after 2029.<sup>14</sup> As shown in the funding section below, given that the bulk of the structural costs will be mutualised in the context of the new fee-funded posts, the EU and NCA contributions (before pension) would increase by approximately 75 KEUR in real terms compared to 2025 and thereafter would only increase by the standard 2% annually in line with the MFF. These considerations are notwithstanding the request for additional DORA posts covered below. Regarding the NCA contribution to cover pension costs, this drives the bulk of the increase from 2025-2027, due to the known and projected increases in the pension contribution rate.

#### Additional permanent posts requested – EU/NCA funded

Area of need	Number of posts / rationale	Job profiles/ grades
Cybersecurity	2 posts (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 post (TA/AD) to deliver work on enlargement and broader international cooperation (third country equivalence assessment/ monitoring) as well as work on simplification and efficiency	- 1 AD6 Policy Expert (EU regulatory equivalence, simplification)
Data for reporting, and stress testing	1 post (1 TA/AD) with data analytical and quantitative skills – partly identified in previous SPDs – to support EBAs and EC's reporting burden improvements and stress test	- 1 AD5 Banking Expert (Data handling for reporting and stress test)
<b>Total</b>	<b>4 FTEs permanently (3 TA/AD, 1 CA/FG IV)</b>	

#### Additional temporary posts requested (for 2-3 years) – EU/NCA funded

Area of need	Number of posts / rationale	Job profiles/ grades
CRR III/CRD VI:	1 post (TA/AD) to cover c. 140 new mandates (credit risk / securitisation & covered) and support simplification efforts	- 1 AD6 Policy Expert (Credit risk, securitisation / covered bonds / simplification)
DGSD, PSD3/PSR/FIDA	2 posts (1 TA/AD and 1 SNE) to deliver mandates proposed under the revised payment services framework (34 mandates) and the revised DGSD (11).	- 1 AD7 Policy Expert (Payment Services) - 1 SNE Policy Expert (DGS)
<b>Total</b>	<b>3 FTEs for 2-3 years (2 TA/AD and 1 SNE)</b>	

<sup>14</sup> 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 DORA posts – fee- funded

81. Further to the above, the EBA with the other ESAs puts forward a request for additional resources for DORA Oversight:
82. Within the 2025–2027 staffing envelope (30 posts in total), the European Supervisory Authorities (ESAs) successfully established in 2025 the DORA oversight framework, completed the designation of Critical ICT Third-Party Providers (CTPPs), established the Joint Examination Teams (JETs) and planned the first examination activities for 2026.
83. The ESAs followed a risk-based and proportionate approach in the oversight activity planning, and optimised the allocation of staff within the JETs. However, the ESAs have identified structural staff resource insufficiencies as outlined below.

#### 1. Complexity of the CTPPs designated

84. In November 2025, the ESAs have designated 19 CTPPs, which provide ICT services in various technology domains, such as cloud computing, data centres, telecom, managed services (incl. cybersecurity), data management, software, consulting and projects.
85. These are all large and complex companies that require adequate staffing of the oversight team to effectively conduct examination activities, such as ongoing monitoring, requests for information, general investigations, onsite inspections and follow-up activities.
86. Based on the currently available staff resources from the ESAs and CAs, the effort allocated to each CTPP represents for 2026 an **average of 4.4 FTEs per CTPP** (details in the next item), which is limited, considering the size and complexity of these companies.

#### 2. Contributions from CAs

87. The ESAs have planned to perform in 2026 ongoing monitoring (including a discovery phase for each CTPP), a thematic review of contractual arrangements and, for selected CTPPs, deep-dives/onsite inspections. The scope and duration of these activities was kept to a minimum level that would allow the ESAs to bring value to the entire ecosystem (including FEs and their clients, CAs, CTPPs) by contributing to the enhancement of its digital operational resilience.
88. The CAs' contribution to these activities does not cover the minimum need of the ESAs, with a gap of 6 FTEs being identified, as illustrated in the table below.

Examination activity	Total staff need (FTEs)	ESA contribution* (FTEs)	CA contribution (FTEs)	Resource gap (FTEs)
Ongoing monitoring	28	8	18	2
Thematic review	28	8	18	2
Deep dive/ onsite inspection	28	8	18	2
<b>Total</b>	<b>84</b>	<b>24</b>	<b>54</b>	<b>6</b>

\*Excluding Director, Heads of Units, assistant and data analyst.



89. Furthermore, the ESAs observed that the CA contributions are more volatile than initially expected, due to some CAs having very limited staffing (as low as 0.25 FTEs), which prevents them from working on tasks requiring sustained commitments.

### 3. Complex governance

90. After the first 9 months of oversight activities, which included the designation of CTPPs, establishment of the JETs, preparation of the first fee collection, engagement with CTPPs and oversight activities planning for 2026, the ESAs observed the complexity of the operation of the DORA oversight governance and the horizontal activities. Only in 2025 the ESAs held seventeen meetings of the Joint Oversight Network, four meetings of the Oversight Forum, and launched multiple written procedures.
91. To operate the governance and perform all horizontal activities (see the table below) in the upcoming years, the ESAs have estimated a required effort of **8 – 11 FTEs**. This effort comes in addition to the effort for examination activities, cannot benefit from contribution from CAs and could be a drain in the examination work staff.

Horizontal oversight activity	Total staff need (FTEs)
<b>Governance</b> (secretariat JON, OF), <b>planning</b> (JETs, costs, activities) and <b>activity coordination</b>	1.5
<b>Maintenance of methodologies and procedures</b>	0.5
<b>CTPP designation*</b>	3 - 5
<b>TPP Opt-in procedures</b> (per TPP)	0.5 - 1
<b>Third country cooperation</b> (MoU negotiations and follow-up tasks, participation international bodies)	1
<b>Preparation of reports under DORA</b> (annual oversight activities and benchmarking)	0.5
<b>IT tools</b> (business support and operational tasks)	0.5 - 1
<b>Other tasks</b>	0.5
<b>TOTAL:</b>	<b>8 - 11</b>

\* CTPP designation process in 2025 consumed 7 FTEs, many of which have been taken from redeployed staff who will no longer be available. The ESAs consider bringing synergies and efficiencies but the designation would still consumes large amount of staff resources.

### Additional resource need (conclusion)

92. To ensure adequate staffing for examination activities over the 19 designated CTPPs and to cover partially the identified need of 14-17 FTEs to perform minimum level of examination and horizontal activities, and to operate the DORA oversight governance, the ESAs have estimated that a minimum increase in resources of 9 FTEs for the 2027–2029 period is now essential. The ESAs will do their best to cover the remaining gap (e.g. 5-8 FTEs) based on synergies and efficiency gains.

### Vacancy rate as of end 2025

93. The authorised establishment plan for 2025 included 33.2 fee-funded posts proposed for the EBA in the initial MiCA, DORA and EMIR LFS. Given that those legislations only enter into force in 2025, the EBA could not levy yet the fees for MiCA and EMIR, those funded posts are yet to be recruited as from 2026. For DORA, 4 TA were recruited in 2025 and 2 offers are already accepted. Excluding the fee

funded posts for DORA/MiCA/EMIR, the end-2025 occupation rate was 99% for the 161 Temporary Agent posts in the establishment plan(excluding the 4TA posts transferred to AMLA).

#### Standard abatement ('abattement forfaitaire')

94. For 2027, the EBA has budgeted for: 89 % occupancy rate (95 % 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 77 % only for SNE positions due to CAs' own resource issues.

#### Salary assumption for calculating salary line (% applied)

95. The cost of the TA and CA posts is based on the actual costs for existing staff at the end of 2025, adjusted in line with EU Commission's Budget Circular for 2027: by 2.2% as from 1 July 2026 and 2.3% as from 1 July 2027. After 2027 the salary costs are adjusted by 2.0% annually in line with MFF adjustment.

#### Correction coefficient used

96. The correction coefficient applicable at the end of 2025 (113.6) is used for all years (2027-2029).

#### Exchange rate used

97. The exchange rates applied are those of 30 September 2025, in line with EC's Budget Circular, although the vast majority of EBA's financial transactions are denominated in euros.

#### Financial resources

98. 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 be fully utilised 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, MiCA and EMIR.

<b>EBA revenues until 2029</b>	<b>2026 (adopted)</b>	<b>2027</b>	<b>2028</b>	<b>2029</b>
EU subsidy	20 779 030	21 332 181	21 758 824	22 194 001
NCA contributions: EU	34 705 036	35 814 519	36 530 810	37 261 426
NCA contributions: EFTA	1 074 459	1 108 809	1 130 985	1 153 605
French government <sup>15</sup>	1 150 000	550 000	-	-
SG REFORM	233 354	244 218	177 186	-
Fees	6 453 368	11 221 505	12 465 935	12 715 254
<b>Total revenue</b>	<b>64 395 247</b>	<b>70 271 232</b>	<b>72 063 740</b>	<b>73 324 285</b>

99. The additional 5 non-fee funded posts and the increase in EU subsidy for Securitisation result in a nominal annual increase of the EU and competent authorities that is 2.7% and 3.2% in 2027, respectively and then only 2.0% as a result of inflation in 2028 and 2029.

<sup>15</sup> 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.

<b>Share of the various revenue sources and annual increase</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>	<b>2029</b>
Share of EU subsidy / Total revenue	32%	30%	30%	30%
Share of NCA contributions (EU) / Total revenue	54%	51%	51%	51%
Share of NCA contributions (EFTA) / Total revenue	2%	2%	2%	2%
Share of fees / Total revenue	10%	16%	17%	17%
Annual nominal increase of EU subsidy		2.7%	2.0%	2.0%
Annual nominal increase of NCA contributions		3.3%	2.0%	2.0%

<b>EBA expenditures until 2029</b>	<b>Budget 2026 (adopted)</b>	<b>Budget 2027</b>	<b>Budget 2028</b>	<b>Budget 2029</b>
<b>Title 1 Staff expenditure</b>	<b>42 629 558</b>	<b>47 573 915</b>	<b>48 912 476</b>	<b>49 831 361</b>
11 Salaries and allowances	36 207 712	40 375 918	41 570 519	42 208 181
- of which establishment plan posts	29 262 018	32 739 658	33 781 534	34 299 719
- of which external staff	6 945 694	7 636 260	7 788 985	7 908 462
11.33 Employer's pension contribution	4 023 193	4 581 140	4 672 763	4 913 043
12 Expenditure relating to staff recruitment	332 831	408 610	416 782	423 175
13 Mission expenses	136 330	117 925	120 284	122 129
14 Socio-medical infrastructure	889 752	985 651	1 005 364	1 020 786
15 Training	347 226	352 774	359 829	365 349
16 External services	526 841	575 346	586 853	595 855
17 Receptions and events	165 673	176 550	180 081	182 843
<b>Title 2 Infrastructure &amp; operating expenditure</b>	<b>14 074 057</b>	<b>13 958 838</b>	<b>14 238 014</b>	<b>14 456 415</b>
20 Rental of buildings and associated costs	5 206 577	4 747 481	4 842 431	4 916 710
21 Information and communication technology	7 837 086	8 093 381	8 255 248	8 381 878
23 Current administrative expenditure	727 859	787 075	802 817	815 131
25 Information and publishing	302 534	330 901	337 519	342 696
<b>Title 3 Operational expenditure</b>	<b>7 691 633</b>	<b>8 738 480</b>	<b>8 913 249</b>	<b>9 036 509</b>
31 General operational expenditure	3 027 597	3 090 683	3 152 497	3 200 854
32 IT expenditure for operational purposes	4 664 036	5 647 797	5 760 752	5 835 655
33 Oversight expenditure	p.m.	p.m.	p.m.	p.m.
<b>TOTAL EXPENDITURE</b>	<b>64 395 247</b>	<b>70 271 232</b>	<b>72 063 740</b>	<b>73 324 285</b>

### Budget for year 2027

100. 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 2027-2029 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.

101. With its office lease expiring in the first half of 2028, EBA has to envisage possible one-off costs in 2027 linked to office move. These costs may be offset by cost-free lease in subsequent years. To provide for these possible costs, smoothen the budgetary impact, and reduce the possibility that the EBA would have to request additional funding for these costs, to the extent feasible the EBA intends to retain the funds received from the French government to use against them.
102. For DORA oversight, the ESAs have decided to work as “one team” and have pooled 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. Further, following an initial assessment of the available staff at the ESAs and the contributions from competent authorities, the ESAs have arrived at the view that the number of posts at the ESAs is insufficient and have requested an increase of 3 post for each ESA (9 in total) – as set out in more detail above.

## Financial resources – EBA request

### *Title 1 – EU and NCA*

103. 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 2027), 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 84,600 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 26,000 per trainee;
  4. Recruitment costs include provision for two vacancy procedures requiring management assessment centre, external participants on recruitment panels, and advertising in paid media;
  5. The budget includes 296 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. It is intended to continue learning and development activities at a similar level to 2026;
  11. Regarding external services, the EBA plans to undertake a 360-degree evaluation for managers similar to the one conducted in 2020/2021 and to require external services to assist with the

implementation of the IAS action plan. Interim staff cost is estimated to remain at 2026 level, while the staff exchange programme to phase out by beginning of 2027;

12. EBA funds staff and department/unit team-building events, and staff committee costs at a similar level as in 2026.

### *Title 1 - fees*

104. 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.

### *Title 2 – EU and NCA*

105. Building lease costs contractually increase every year based on French indexation (ILAT<sup>16</sup>). The latest published ILAT index for 2<sup>nd</sup> quarter of 2025 indicates an increase of 0.51% on annual basis. For 2027, EBA is budgeting for 2% ILAT in line with MFF adjustment.
106. 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. The French government's contribution of EUR 550,000 will be retained for use against possible one-off costs arising from the procurement of the next building lease. This contribution expires in 2027 and as in the past year, EBA will receive the contribution as external assigned revenue. Building running costs are being budgeted to increase at 2 % per annum.
107. IT costs will be driven by the continued operational costs of Cloud and end-user services, cybersecurity, and of operational IT systems such as the collaboration platform, workflow systems, SYSPER (HR), the document and records management system (ERMS), and the new finance system (SUMMA, which should be fully operational as of 2027). EBA will continue to ensure that cloud costs remain in line with projections.
108. External services and communications are expected to operate at a similar level of activity and budget as in 2026. EBA is providing for higher legal costs resulting from possible litigation on newer mandates.

### *Title 2 – fees*

109. 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 2027.

### *Title 3 – EU and NCA*

110. 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

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<sup>16</sup> *Indice des loyers des activités tertiaires (ILAT)*

similar level of physical meetings and travel as in 2026, increased by the cost of the Joint Consumer Protection Day for which EBA will be responsible in 2027.

- 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 lower level than in 2026. 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.

- 111. 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 initiatives: driven by the mandates of PSD3/PSR/FIDA and continuation of Pillar 3 hub. Work will also continue on identity management, EDAP, the DORA oversight, IMMV and stress test collaboration platforms, and enhancements on workplace solutions such as the colleges platform.

### *Title 3 – fees*

- 112. 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**

- 113. 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 three years (end-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.

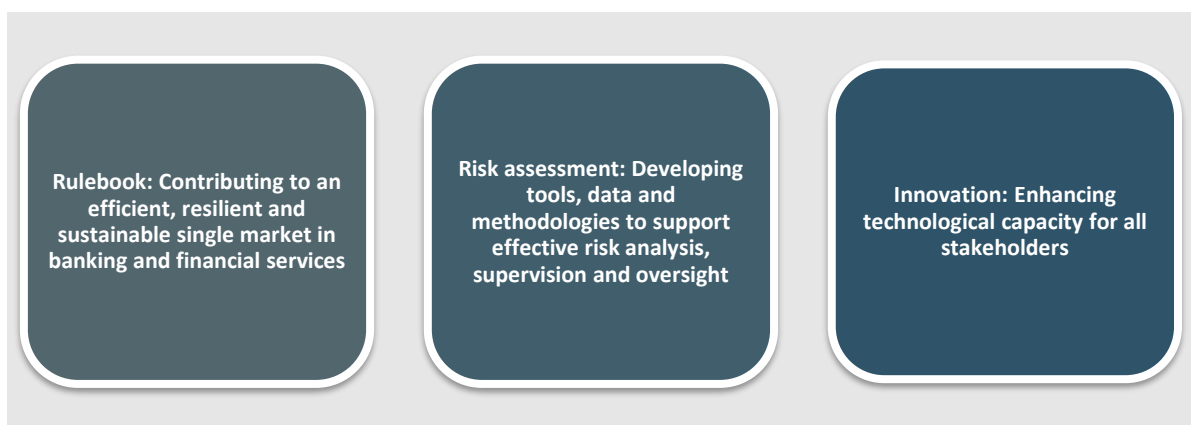
## SECTION III - ANNUAL WORK PROGRAMME 2027

### 1. OVERVIEW

114. The priorities for 2027-2029 will underpin the EBA's draft work programme for 2027. The fact that one task does not specifically does not imply that it will not be discharged or is less important, but simply that it is well established and requires less focus. An updated stand-alone work programme for 2027 will be adopted and published in September 2026.

### 2. THE EBA'S STRATEGIC PRIORITIES IN 2027

115. In 2027, the EBA will refer to its multi-annual priorities for 2027-2029 with specific areas of focus.



#### Areas of focus in 2027

##### Single Rulebook

- Simplification and efficiency
- Banking package
- Payment services
- CMDI with BRRD and DGSD
- ESIU and securitisation

##### Supervisory convergence

- Rebalancing ex ante harmonisation towards ex post convergence
- Peer reviews
- IRRBB
- Liquidity/ funding

##### Risk assessment and stress test

- Efficient EU stress test capacity
- Timely risk analysis, outreach
- Analysis of ICT incidents and cyber threats

##### Supervision and oversight

- DORA oversight
- MiCA supervision
- EMIR IMM validation

##### Data, tools, and methodologies

- Integrated reporting
- Reviewed data collection

##### Technological capacity

- Innovation monitoring and knowledge sharing
- Focus on AI Act
- Crypto, DLT and Value chain

##### Consumer protection

- Over-indebtedness, de-risking and education
- Implications of innovation

### 3. ACTIVITIES IN 2027

116. This subsection sets out EBA's draft work programme for 2027, linking tasks to activities and priorities. It reflects current legislative mandates conferred to the EBA, expected ones and the current outlook: it comprises 208 deliverables (grouped in 7 activities), of which 130 are of an ongoing nature and 78 have legal deadlines. New priorities and discussions of the EC and related directions from the BoS will be reflected by the time the stand alone EBA 2027 work programme is finalised (by September 2026).

#### Activity 1 – Policy development

<b>Contributing to priority 1</b>	Directorates: PRSP, ICC, ERA Units: LILLAC, RBM, SRRR, COPAC, DF, ESGR
<b>Objective</b>	To develop and maintain an effective, simple, efficient and proportionate Single Rulebook for banking and financial activities in the EU
<b>Description</b>	<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

<b>Prudential regulation (CRR, CRD, SEC R, IFR, IFD, EMIR, CSDR...)</b>	<b>Delivery</b>
- Accounting and auditing (incl. consolidation)	
• Opinions on financial holding company derogations	Ongoing
- Liquidity risk	
• Report on LCR and NSFR implementation	Ongoing
- Credit risk – TFE reco 2.1	
• RTS on conditions and criteria for assigning exposures to the IRB exposure classes	Q3
• RTS on calculating risk-weighted exposure amounts for dilution risk of purchased receivables	
• RTS on comparable property	
• Report on the calibration of risk parameters of leasing exposures under IRBA	
• GL on immateriality of size and risk profile of exposures	Q4
• Report on proportionality	
• Report on the impact of requirements on agricultural financing (intermediary report)	
- Large exposures	
• Report on non-banking financial intermediation contribution to the CMU and institutions' exposures to shadow banking entities	Q4
- Market, counterparty and CVA risk	



• EU implementation of Basel III market risk, CVA and CCR framework	Ongoing
• RTS on net short credit and equity positions? [To be seen in light of FRTB implementation]	Q3
• Guidelines on exceptional circumstances for the reclassification of a position [idem]	
• RTS on the hypothetical portfolios of CIUs in the trading book [idem]	
• RTS on further technical elements for regulatory CVA [idem]	
• RTS on instruments appropriate to estimate PDs	
• RTS on assessment methodology for the SA-CVA – CP [Quid FRTB implementation]	Q4
• RTS on the materiality of extensions and changes for the SA-CVA – CP [Idem]	
• RTS on assessment methodology for the FRTB-SA – CP [Idem]	
<i>- Operational risk</i>	
• GL on governance arrangements for loss data sets	Q1?
• RTS on the risk management framework	
<i>- Market access</i>	
• Joint-ESAs system for exchanging fit & proper assessments information – TFE reco 15	Ongoing
<b><i>Crisis management (BRRD, DGSD, CMDI)</i></b>	
<i>- Depositor protection</i>	
• RTS on Client funds	Q1
• ITS on DGS Reporting (from credit institutions to DGS and from DGS to the EBA)	
• GL on calculation of contributions to DGS funds (codifying own initiative GL)	
• GL on irrevocable payment commitments (codifying own initiative GL)	
• ITS on depositor information sheet from credit institutions and DGS to consumers	Q2
• GL on preventive measures	
• GL on investments – CP	Q3
• GL on cross-border cooperation – CP	
• RTS on available financial means (AFM) and fund target (codifying and extending existing own-initiative GLs) -CP	
• GL on conditions to lift the 62.5% cap on the bridge mechanism	Q4
<b><i>Sustainable finance (CRR, CRD, SFDR)</i></b>	
• 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 of exposures to environmental and social risks	TBC
<b><i>Payment services and electronic money (PSD, PSR, FIDA)</i></b>	
• Delivery of the EBA's mandates under PSD3, PSR, FIDA and DGSD3 as per EBA Roadmap	Q4
<b><i>Innovation monitoring and knowledge sharing, ICT policy and operational resilience</i></b>	
• Technical inputs to EU initiatives in digital finance (i.e. digital Euro, DORA, MiCA)	Ongoing

## Activity 2 – Supervisory convergence and enforcement

<b>Contributing to priority 1</b>	Directorate: PRSP, ICC, ERA Units : LILLAC, RBM, SRRR, COPAC, DF, ESGR, L&C
<b>Objective</b>	To promote a consistent and effective application of the Single Rulebook for banking and financial activities in the EU
<b>Description</b>	<p>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.</p> <p>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.</p>

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

<b><i>Supervisory convergence (prudential and resolution)</i></b>	<b><i>Delivery</i></b>
• EBA annual report on supervisory convergence work in 2026 – TFE reco 17	Q2
• Union Strategic Supervisory Priorities for prudential and resolution authorities in 2028	Q3
• Supervisory disclosure exercises (CRD / IFD)	
• ESA's supervisory independence assessment	Q4
<b><i>Q&amp;A</i></b>	
• Q&A: answering questions of external stakeholders on the Single Rulebook	Ongoing
<b><i>Peer reviews</i></b>	
• Follow-up peer review on tax integrity (Cum ex)	Q1
• Follow-up peer review on proportionality in the application of SREP	Q3
• Follow-up peer review on deposit guarantee scheme stress testing	Q4
<b><i>Breach of Union law, Complaints and mediation</i></b>	
• Identification and investigation of potential breaches of EU law	Ongoing
• Settlement of possible disagreements between CAs	Ongoing
<b><i>Training</i></b>	
• Training programme for competent authorities	Ongoing
<b><i>Prudential regulation (CRR, CRD, SEC R, IFR, IFD, EMIR, CSDR...)</i></b>	
<b><i>- Own funds and capital requirements</i></b>	
• 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	
• Monitoring implementation of prudential consolidation provisions and follow-up report	
<b><i>- Accounting and auditing</i></b>	
• Monitoring of accounting standards (including liaison with IASB)	Ongoing
• Follow up of the EBA IFRS 9 benchmarking reports with competent authorities	
<b><i>- Liquidity risk</i></b>	
• 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	
<b><i>- Interest rate risk</i></b>	
• 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> * <i>deprioritised</i> <sup>17</sup>		Ongoing
• 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
<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
• 2026 benchmarking report on IRB models		Q1
• 2026 benchmarking report on market risk models		
• Preparation of the 2028 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
<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 and to NGFS		
<b><i>Crisis management (BRRD, DGSD, CMDI)</i></b>		
• 2027 report on the uses of DGS funds and financial means available to DGSs		Q2
<b><i>Colleges</i></b>		
• 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		
• Set up supervisory platforms bringing authorities from various horizons together – TFE reco 14		

<sup>17</sup> Work marked as \* deprioritised had been identified as deprioritised in previous work programmes due to resources constraints. This has been maintained.

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**Consumer protection, payments and conduct (MCD, CCD)**


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|----------------------------------|----|
| • Consumer Trends Report 2026/27 | Q1 |
|----------------------------------|----|
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**Digital finance**


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*- 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   |         |
- 

*- MiCA*

- |  |         |
|--|---------|
| • Support to consistent implementation of MiCA by CAs  | Ongoing |
| • Opinions on classification of crypto assets  |         |
| • Monitoring of crypto-asset markets (esp. ART and EMT)  |         |
| • Review of MICA supervisory handbook  | Q4      |
| • Response to ESRB Recommendation on third-country multi-issuer stablecoin schemes (ESRB/2025/9) |         |
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**Activity 3 – Risk and financial stability analysis**


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**Contributing to priority 2** Directorate: ERA  
Units: RAST, EAIA, ESGR, DFU

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|-------------------|--|
| <b>Objectives</b> | 1) To identify and monitor risks and vulnerabilities in the EU banking and financial sector<br><br>2) To assess the resilience of EU financial institutions and of the EU banking system as a whole to adverse developments<br><br>3) To maintain and enhance state of the art tools, models and methodologies for risk and policy analysis, stress testing and other EBA functions. |
|-------------------|--|
- 

<b>Description</b>	<p>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.</p> <p>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.</p>
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**Main deliverables**

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

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|--|---------------|
| • Analyses of risks and vulnerabilities for the EU banking sector                    | Ongoing       |
| • Opinions on macroprudential measures   |               |
| • Publication of thematic notes (incl. on ESG risks)                                 |               |
| • Quarterly risk dashboard   | Quarterly     |
| • ESG risks dashboard  | Semi-annually |
| • JC Spring risk report  | Q2            |
| • Risk assessment questionnaires (Spring 2027)                                       |               |
| • Q2 Risk assessment report of the EU (incl. funding, asset encumbrance & liquidity) |               |
-

• List of other systematically important institutions (OSIIs) 2027	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 2027)	
<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	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

<b>Contributing to priority 2</b>	Directorate: DORA Oversight, ICC, PRSP Units: DORA Oversight units, DF, RBM
<b>Objectives</b>	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
<b>Description</b>	<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

<b>DORA Oversight</b>	<i>Delivery</i>
• Carrying out DORA oversight activities	Ongoing
• Ongoing monitoring of CTPPs	
• External engagement – third country cooperation	
• Requests for information to CTPPs*	Recurring
• General investigations of CTPPs*	
• On-site inspections of CTPPs*	
• CTPP Risk assessment	Q2
• Oversight activity planning	
• Follow-up from previous years oversight activities	

• Annual CTPP designation	Q4
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#### **MiCA Supervision**

• Significance assessment of issuers of ART/EMT	Ongoing
• Supervision of significant ARTS and EMTs (if warranted)	
• Investigations of supervisory/enforcement decisions under MiCA	
• Exertion, as appropriate, of intervention powers	

#### **EMIR validation of initial margin models (IMM)**

• Develop internal supervision guidance and supervisory tools	Ongoing
• Approve changes to certain IMM	
• Coordinate with EU and non-EU competent authorities on changes to certain IMM	
• Monitor developments in derivatives markets	

\*The specific time for performing these oversight activities may differ across CTPPs. Depending on the oversight intensity of the CTPP, their duration, recurrence and intensity may also differ across CTPPs.

### **Activity 5 – Data**

<b>Contributing to priority 2</b>	Directorate: DART Units : STATS, RT
<b>Objectives</b>	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
<b>Description</b>	<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**

<b>Reporting and Transparency</b>	<b>Delivery</b>
• Maintenance of the technical package supporting reporting and Pillar 3 frameworks	Ongoing
• 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	
<b>- Transparency and Pillar 3</b>	
• 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	

• Extension of Pillar 3 data hub to SNCIs	TBD
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**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> <sup>18</sup>	
• 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 Quarterly / semi- dashboard, for internal and external data users	annually / annually
• Bank-specific dashboards for internal users and CAs	annually
• 2027 EU-wide Transparency exercise	Q4

**Activity 6 – Governance**

<b>Contributing to all priorities</b>	Directorate: N/A Units : GEA, L&C, IT, CS
<b>Objectives</b>	1) To support EBA's governing bodies and management 2) To coordinate stakeholder engagement and ensure accountability
<b>Description</b>	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**

<b>Stakeholder engagement, planning and strategy</b>	<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 <sup>rd</sup> country regulatory and confidentiality equivalence	
• Support to implementation of EU's Association Agreement with Andorra & San Marino	
• Draft Single programming document (2028-2030)	Q1
• Annual report 2026 - with CAAR requirements	Q2
• JC Annual report 2026	
• Work programme 2028	Q3
• JC Work programme 2028	
• Opinion on EP 2025 discharge report	
• MoU between AMLA prudential supervisors, NCAs responsible for MiCA and ESAs	TBC
<b>Legal advice</b>	
• Legal advice on all relevant matters (including in case of litigation)	Ongoing
• Enforcement	
• Handling of access to documents requests	

<sup>18</sup> Work marked as \* deprioritised had been identified as deprioritised in previous work programmes due to resources constraints. This has been maintained.



- Representation of EBA before Board of Appeal, ECJ, Ombudsman (as necessary)

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**ERM, audits and internal control**


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- 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**


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- External and internal communication Ongoing
- 

### Activity 7 – Operations

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**Contributing to** Directorate: Operations

**all priorities** Units : FP, HR, IT, CS

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**Objective** To enable the EBA's activities in a cost-efficient and state-of-the art manner

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**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.

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**Main deliverables**


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**HR** *Delivery*

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- Execution of the Establishment Plan Ongoing
  - Compliance with applicable staff rules
  - Execution of Horizon 2028 Talent strategy
  - Continuation of HR digitalisation (deployment of EC's SYSPER tool)
- 

**Finance**


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- Establishment of the 2026 annual accounts Ongoing
  - Execution of 2027 annual budget including procurement plan
  - Preparations for 2028 and 2029 budgets
  - Refinement of fee funding tools and processes
- 

**Corporate**


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- 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**


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*Execution of EBA's IT Strategy and 2026 Operational IT plan*

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*- Support and optimisation of Enterprise IT solutions (incl. AI)*

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- Document Management, Collaboration Platform, Identity & Access Management, Ongoing
  - Extranet, Intranet, EC solutions (Sysper, Missions, SUMA)
  - Enhance productivity and efficiency by utilising AI Capabilities
- 

*- EBA Mandates: Evolution and implementation of IT solutions*

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- Pillar 3 Hub, EMIR3 (IMMV) Q3
  - EUCLID evolution to support additional data collections (i.e. Instant Payments) Q4
- 

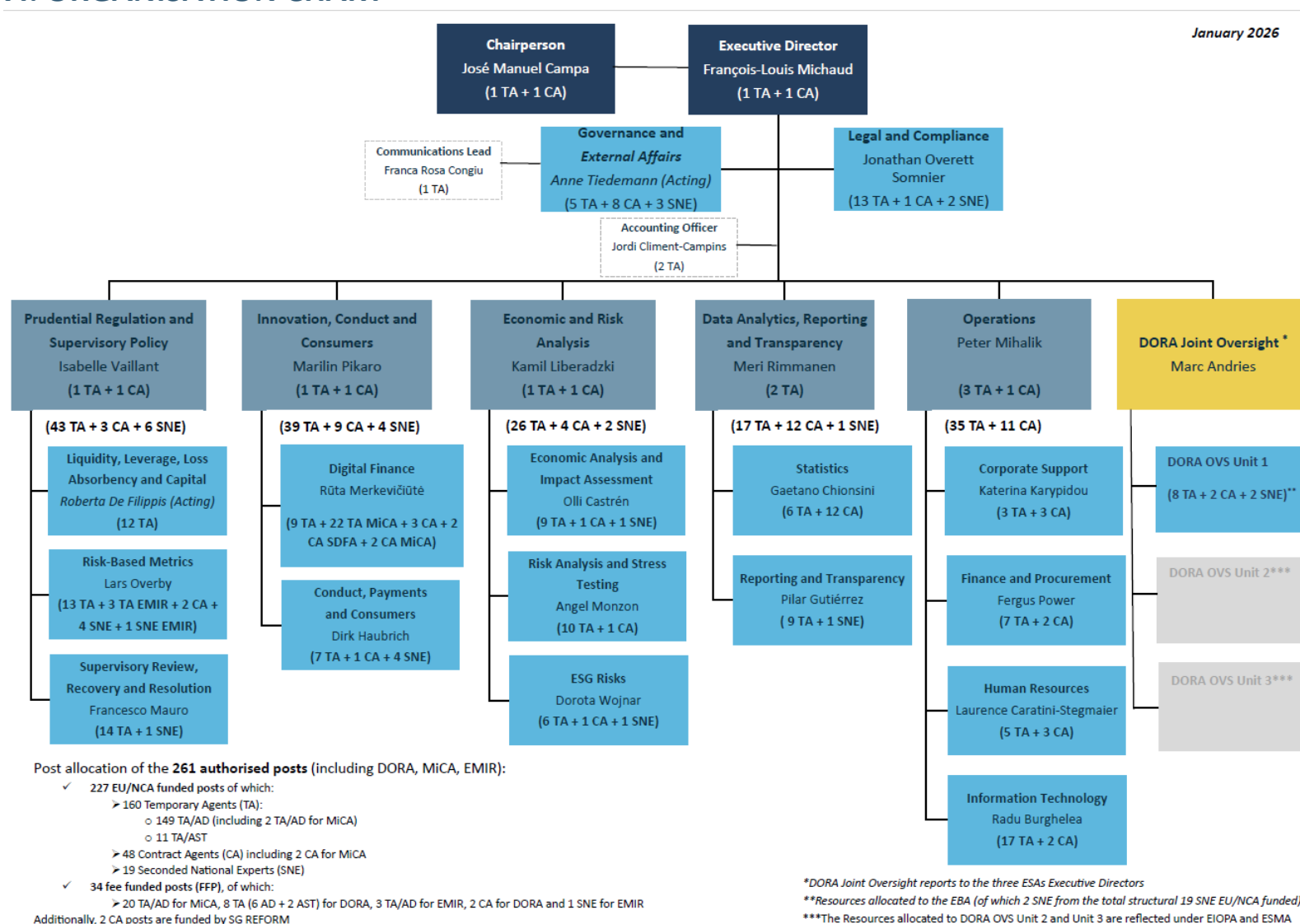
*- EBA Data hub*

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- Evolution of EBA analytics and dissemination capabilities (EDAP, Databricks, SAS) Ongoing
-

<i>- Oversight</i>	
• Support and evolution of IT capabilities for DORA Oversight function	Ongoing
• Support and evolution of MICA shared platform	
<i>- Innovation</i>	
• AI Programme (including Legal & Compliance, Literacy, Policy, Tools and adoption to deliver compliant, high-impact use cases, and achieve productivity gains.	Ongoing
<i>- EURECA Transfer to AMLA</i>	
• Hyper care support for EURECA	Ongoing
<i>- Deployment and optimisation of Cybersecurity Frameworks</i>	
• EBA compliance and security activities	Ongoing
• Implementation of Cyber regulation	Q1-Q4

## ANNEX I: ORGANISATION CHART



## ANNEX II: RESOURCE ALLOCATION PER ACTIVITY – 2026 - 2029

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.)

The allocation includes the request for additional resources set out in section 2.5 above.

	2026					2027					2028					2029				
Activity	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	34.3	4.6	10.6	49.5	9 675 105	37.3	4.6	11.6	53.5	11 143 788	37.3	4.6	11.6	53.5	11 366 664	37.3	4.6	11.6	53.5	11 564 690
2. Supervisory convergence and enforcement	36.6	8.5	1.3	46.5	10 834 801	37.6	8.5	1.3	47.5	11 028 548	37.6	8.5	1.3	47.5	11 249 119	37.6	8.5	1.3	47.5	11 445 139
3. Risk, Economic analysis and financial stability	15.7	4.4	0.2	20.3	4 794 135	16.7	4.4	0.2	21.3	5 243 398	16.7	4.4	0.2	21.3	5 348 266	16.7	4.4	0.2	21.3	5 441 457
4. Oversight and supervision	39.3	4.0	3.4	46.7	8 021 142	42.2	4.0	3.4	49.7	11 376 751	42.2	4.0	3.4	49.7	11 991 369	42.2	4.0	3.4	49.7	12 205 087
- DORA Oversight (fee-funded)	8.0	2.0		10.0	3 208 958	11.0	2.0		13.0	4 628 138	11.0	2.0		13.0	4 720 700	11.0	2.0		13.0	4 815 114
- MiCA Supervision (fee-funded)	20.0			20.0	669 310	20.0			20.0	2 257 084	20.0			20.0	2 689 308	20.0			20.0	2 743 095
- EMIR validation of IMM (fee-funded)	3.0		1.0	4.0	839 745	3.0		1.0	4.0	1 490 020	3.0		1.0	4.0	1 519 821	3.0		1.0	4.0	1 550 217
5. Data management	19.1	12.5	1.5	33.1	8 904 384	20.1	12.5	1.5	34.1	8 233 770	20.1	12.5	1.5	34.1	8 398 446	20.1	12.5	1.5	34.1	8 544 537
6. Governance	12.3	7.5	3.0	22.8	4 154 952	13.3	7.5	3.0	23.8	4 704 512	13.3	7.5	3.0	23.8	4 798 602	13.3	7.5	3.0	23.8	4 882 234
7. Operational support	33.6	10.5		44.1	18 010 728	34.6	11.5	-	46.1	18 540 466	34.6	11.5	-	46.1	18 911 275	34.6	11.5	-	46.1	19 241 142
Total	191.0	52.0	20.0	263.0	64 395 247	202.0	53.0	21.0	276.0	70 271 232	202.0	53.0	21.0	276.0	72 063 740	202.0	53.0	21.0	276.0	73 324 285

\* Activity '2. 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 is noted:

- For DORA oversight the situation is as follows: in 2025, 6 allocated fee-funded TA posts were 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 situation is as follows: The allocated EU-funded posts (2 TA and 2 CA posts) were filled in 2024 and are allocated to activity 8. In 2026 and 2027, respectively 2 and 7 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).

## ANNEX III: FINANCIAL RESOURCES 2027-2029

Table 1 – Revenues (COM report format)

REVENUES	2025 executed budget	2026 adopted budget	2027 requested budget	Envisaged 2028	Envisaged 2029
<b>1 REVENUE FROM FEES AND CHARGES</b>	<b>1 671 322</b>	<b>6 453 368</b>	<b>11 221 505</b>	<b>12 465 935</b>	<b>12 715 254</b>
<b>2. EU CONTRIBUTION</b>	<b>21 303 298</b>	<b>20 779 030</b>	<b>21 332 181</b>	<b>21 758 824</b>	<b>22 194 001</b>
of which assigned revenues deriving from previous years' surpluses	424 468	55 073	-	-	-
<b>3 THIRD COUNTRIES CONTRIBUTION (incl. EFTA)</b>	<b>1 084 651</b>	<b>1 074 459</b>	<b>1 108 809</b>	<b>1 130 985</b>	<b>1 153 605</b>
of which EFTA	1 084 651	1 074 459	1 108 809	1 130 985	1 153 605
<b>4 OTHER CONTRIBUTIONS</b>	<b>35 911 617</b>	<b>36 088 390</b>	<b>36 608 737</b>	<b>36 707 996</b>	<b>37 261 426</b>
of which EU NCA contributions	35 034 213	34 705 036	35 814 519	36 530 810	37 261 426
of which host state contributions	575 000	1 150 000	550 000	-	-
of which SG REFORM contributions	302 404	233 354	244 218	177 186	-
<b>5 ADMINISTRATIVE OPERATIONS</b>					
<b>6 REVENUES FROM SERVICES RENDERED</b>	<b>247 992</b>	-	-	-	-
<b>7 CORRECTION OF BUDGETARY IMBALANCES</b>					
<b>TOTAL REVENUES</b>	<b>60 218 880</b>	<b>64 395 247</b>	<b>70 271 232</b>	<b>72 063 740</b>	<b>73 324 285</b>

### Calculating NCA contributions

Inputs	2027 value	Source
<b>A</b> Amount of the EU subsidy	21 332 181	Set by the budgetary authority
<b>B</b> Ratio of the EU subsidy to Member State contributions	40:60	EBA founding regulation – recital
<b>C</b> Budgeted amount of the employer's pension contribution (NCA-funded only)	3 831 900	Calculated by EBA
<b>D</b> Total NCA voting weight	333	Article 3(3) of Protocol (No 36) on transitional provisions
<b>E</b> Total EU NCA voting weight	323	Article 3(3) of Protocol (No 36) on transitional provisions
<b>F</b> Total EFTA NCA voting weight	10	Article 62(1)(a) of Annex IX (Financial services) to the EEA agreement <sup>14</sup> 19F. <sup>19</sup>

### Calculation formulae:

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

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

<sup>19</sup> <https://www.efta.int/media/documents/legal-texts/eea/the-eea-agreement/Annexes%20to%20the%20Agreement/annex9.pdf>.

Table 2 – Expenditure

EXPENDITURE	2025 executed budget <sup>20</sup>	2026 adopted budget	2027 request budget	Envisaged 2028	Envisaged 2029
<b>Title 1 Staff expenditure</b>	<b>40 090 950</b>	<b>42 629 558</b>	<b>47 573 914</b>	<b>48 912 476</b>	<b>49 831 361</b>
11 Salaries & allowances	34 681 396	36 207 712	40 375 918	41 570 519	42 208 181
- of which establishment plan posts		29 262 018	32 739 658	33 781 534	34 299 719
- of which external personnel		6 945 694	7 636 260	7 788 985	7 908 462
11.33 Employer's pension contributions	3 423 026	4 023 193	4 581 140	4 672 763	4 913 043
12 Expenditure relating to staff recruitment	179 155	332 831	408 610	416 782	423 175
13 Mission expenses	104 239	136 330	117 925	120 284	122 129
14 Socio-medical infrastructure	822 979	889 752	985 651	1 005 364	1 020 786
15 Training	346 431	347 226	352 774	359 829	365 349
16 External Services	392 291	526 841	575 346	586 853	595 855
17 Receptions and events	141 433	165 673	176 550	180 081	182 843
<b>Title 2 Infrastructure and operating expenditure</b>	<b>12 723 747</b>	<b>14 074 057</b>	<b>13 958 838</b>	<b>14 238 015</b>	<b>14 456 415</b>
20 Rental of buildings and associated costs	5 046 207	5 206 577	4 747 481	4 842 431	4 916 710
21 Information and communication technology	6 836 545	7 837 086	8 093 381	8 255 248	8 381 878
23 Current administrative expenditure	515 040	727 859	787 075	802 817	815 131
25 Information and publishing	325 955	302 534	330 901	337 519	342 696
<b>Title 3 Operational expenditure</b>	<b>7 380 352</b>	<b>7 691 633</b>	<b>8 738 480</b>	<b>8 913 249</b>	<b>9 036 509</b>
31 General operational expenditure	1 978 855	3 027 597	3 090 683	3 152 497	3 200 854
32 IT expenditure for operational purposes	5 401 497	4 664 036	5 647 797	5 760 752	5 835 655
33 Oversight expenditure	p.m.	p.m.	p.m.	p.m.	p.m.
<b>TOTAL EXPENDITURE</b>	<b>60 195 049</b>	<b>64 395 247</b>	<b>70 271 232</b>	<b>72 063 740</b>	<b>73 324 285</b>

<sup>20</sup> Budget 2025 shows actual expenditure on voted budget.

**Table 3 – Budget outturn and cancellation of appropriations**

<b>Budget outturn</b>	<b>2023</b>	<b>2024</b>	<b>2025 (draft)</b>
Reserve from the previous year's surplus (+)	605 145	207 903	656 415
Revenues actually received (+)	52 468 356	56 933 412	59 661 672
Payments made (-)	- 48 857 367	-53 380 720	- 53 773 858
Carry-over of appropriations (-)	- 3 945 729	-4 083 658	- 6 547 467
Cancellation of appropriations carried over (+)	71 989	79 877	78 007
Adjustment for carry-over of assigned revenue appropriations from previous year (+)	737 110	383 753	184 872
Exchange rate differences (+/-)	1 379	- 30	521
Adjustment for negative balance from previous year (-)	-	-	-
<b>Total surplus</b>	<b>1 080 883</b>	<b>140 537</b>	<b>260 162</b>

The 2025 budget outturn is a draft figure that may still require adjustment during the accounts closure.

The 2025 surplus will be offset against 2027 contributions.

One hundred and twelve (112) commitments were carried over from 2024 to 2025. The EBA decommitted 2.0 % of the value of commitments carried over i.e., EUR 78 007 from a total of EUR 3 913 886. This is a slightly lower than was decommitted on the previous year's carry forward. The EBA estimates at least 51 % of the decommitted amount arose from matters outside the EBA's control.



## ANNEX IV: HUMAN RESOURCES - QUANTITATIVE

[Update ongoing but incomplete]

Table 1 – 2027-2029 overview of staff by contract type

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

Staff ESTABLISHMENT PLAN POSTS	Authorised Budget	2025 Year N-1 Actually filled as of 31/12/2025	Occupancy rate%	2026 Year N Authoris ed staff	2027 Year N+1 Envisaged staff	2028 Year N+2 Envisaged staff	2029 Year N+3 Envisaged staff
Administrators (AD)	151	145	99%	151	156 (151+5)	156 (151+5)	156 (151+5)
Assistants (AST) <sup>a</sup>	11	11	100%	11	11	11	11
Assistants/Secretaries (AST/SC)	-			-	-	-	-
SDFA <sup>b</sup>	1	1	100%	-	-	-	-
MiCA <sup>c</sup>	22 (0 of 20 FFP)	2	100%	22 (2 of 20 FFP)	22 (7 of 20 FFP)	22 (12 of 20 FFP)	22 (x of 20 FFP)
DORA <sup>d</sup>	8 (6 of 7.2 FFP) (6 AD + 2 AST)	6	(100%)	8 (8 of 8 FFP) (6 AD+2 AST )	11 (8 +3) (8 of 8 FFP) (6 AD+2 AST)	11 (8 + 3) (8 of 8 FFP) (6 AD+2 AST)	11 (8 +3) (8 of 8 FFP) (6 AD+2 AST)
EMIR <sup>e</sup>	3 (0 of 3 FFP)	-	-	3 (3 of 3 FFP)	3 (3 of 3 FFP)	3 (3 of 3 FFP)	3 (3 of 3 FFP)
ESIU/ SecReg <sup>f</sup>					3	3	3
AMLA <sup>g</sup>	-	-	-	-4	-4	-4	-4
<b>TOTAL ESTABLISHMENT PLAN POSTS</b>	<b>196</b>	<b>165</b>	<b>86% (99%)</b>	<b>191</b>	<b>202 (194 + 5 + 3))</b>	<b>202 (194 + 5 + 3))</b>	<b>202 (194 + 5 + 3))</b>
EXTERNAL STAFF	FTE from authorised Budget	Executed FTE as of 31/12/2025	Execution rate % <sup>h</sup>	FTE from authorise d budget	Envisaged FTE	Envisaged FTE	Envisaged FTE
Contract Agents (CA)	50	45	98%	50	51 (50+1)	51 (50+1)	51 (50+1)
SDFA <sup>b</sup>	-	-	-	-	-	-	-
MiCA <sup>c</sup>	2	2	100%	2	2	2	2
DORA <sup>d</sup>	2 (0 of 2 FFP)	-	-	2 (2 of 2 FFP)	2 (2 of 2 FFP)	2 (2 of 2 FFP)	2 (2 of 2 FFP)
AMLA <sup>g</sup>	-	-	-	-4	-4	-4	-4
Seconded National Experts (SNE) <sup>h</sup>	20 (0 of 1 FFP) (19 + 1 EMIR FFP)	16	84%	20 (1 of 1 FFP) (19 +1 EMIR FFP)	22 (1 of 1 FFP) (19 +1 +1 EMIR FFP)	22 (1 of 1 FFP) (19 +1+1 EMIR FFP)	22 (1 of 1 FFP) (19 +1 +1 EMIR FFP)
<b>TOTAL EXTERNAL STAFF</b>	<b>74</b>	<b>63</b>	<b>90% (9%)</b>	<b>70</b>	<b>72 (70+2)</b>	<b>73 (70+2)</b>	<b>73 (70+2)</b>
<b>TOTAL STAFF</b>	<b>270</b>	<b>228</b>	<b>87% (97%)</b>	<b>261</b>	<b>274 (264+10)</b>	<b>274 (264+10)</b>	<b>274 (264+10)</b>
- EU/NCA funded	236.8			227	238	238	238
- Fee-funded posts	33.2			34	37	37	37
REQUEST FOR ADDITIONAL RESOURCES (EU/NCA)					7 (5 AD + 1 CA +1 SNE)	7 (5 AD + 1 CA + 1 SNE)	7 (5 AD + 1 CA + 1 SNE)
- of which: permanent					4 (3 AD + 1 CA)	4 (3 AD + 1 CA)	4 (3 AD + 1 CA)
- of which temporary (2-3 years)					3 (2 AD + 1 SNE)	3 (2 AD + 1 SNE)	3 (2 AD + 1 SNE)
REQUEST FOR ADDITIONAL DORA RESOURCES (FFP)					3 (3 AD)	3 (3 AD)	3 (3 AD)

FFP stands for fee-funded post

- <sup>a</sup> 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).
- <sup>b</sup> SDFA: 1 AD and 1 CA funded by SG REFORM (signed SLA in 2022: from 2023 until end of 2025). Under a new SLA extending the SDFA to 2028, SG REFORM funds 2 CA. As requested, the CA posts for SDFA are shown in Table 1.b below.
- <sup>c</sup> 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.
- <sup>d</sup> 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.
- <sup>e</sup> EMIR validation of certain IMM: allocation of 3 AD fee funded posts and 1 SNE from 2025. Start of validation not before 2026.
- <sup>f</sup> 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.
- <sup>g</sup> AMLA: total of 8 posts to be removed given transfer of certain responsibilities to AMLA (4 AD and 4 CA).
- <sup>h</sup> SNE: 19 “structural cost paid SNEs” + 1 SNE fee funded for EMIR to be hired in 2026 + plus 2 additional as per request. The EBA also relies on 4 cost-free SNE at the end of 2025.
- <sup>i</sup> Percentages are calculated without the 8 posts transferred to AMLA (4 TA + 4 CA); the percentages in brackets are showing the real occupancy rate without MiCA/DORA/EMIR fee-funded posts.
- Further information on the request for additional resources is included in sections II.2.

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

Human Resources	2026 Year N	2027 Year N+1	2028 Year N+2	2029 Year N+3
	Envisaged FTE	Envisaged FTE	Envisaged FTE	Envisaged FTE
Contract Agents (CAs)	2	2	2	-
Seconded National Experts (SNEs)	-	-	-	-
<b>TOTAL</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>-</b>

\*As indicated above, the posts included here represent the CA for the SDFA funded by SG REFORM until 2028.

## c. Other Human Resources

Structural service providers	FTE in place as of 31/12/2025
Security	-
IT	33
Other (specify)	7
Corporate Support	
Interim workers	Total FTEs in year 2025 N-1
Number	5

Table 2 – 2025-2029 -overview of staff by grade

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

Function group and grade	2025 Year N-1				2026 Year N		2027 YearN+1		2028 Year N+2		2029 Year N+3	
	Authorised budget		Actually filled as of 31/12/2025		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						
AD 15		1		1		1		2		2		2
AD 14		5		2		2		2		2		2
AD 13		2		0		3		3		3		3
AD 12		12		10		12		11		11		11
AD 11		10		10		14		12		12		12
AD 10		19		17		20		20		20		20
AD 9		25		24		27		26		26		26
AD 8		30		26		31		30		30		30
AD 7		35		27		31		32*		32		32
AD 6		20		19		20		30		30		30
AD 5		23		17		16		21		21		21
AD TOTAL	-	183		154	-	178	-	189		189	-	189
AST 11												
AST 10												
AST 8												
AST 7		1		1		1		1		1		1
AST 6		2		0		2		1		1		1
AST 5		2		2		3		3		3		3
AST 4		5		4		5		6		6		6
AST 3		2		2		2		1		1		1
AST 2		1		2				1		1		1
AST 1		0		0								
AST TOTAL	-	13		11	-	13	-	13	-	13	-	13
AST/SC*TOTAL	-	-		-	-	-	-	-	-	-	-	-
TOTAL	-	189		165	-	191	-	202	-	202	-	202

\*4 TA/AD7 posts have been removed given the transfer of certain responsibilities to AMLA. The tables include the 3 posts allocated for ESIU LFS (from 2027 onwards) and also reflect the request for additional resources: 5 additional TA/AD posts needed for addressing challenges/avoid delays (CRR III- CRD VI, PSR-PSD, Simplification, Stress testing, Cybersecurity) and 3 additional TA/AD posts for DORA

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

Contract agents	FTE corresponding to authorised budget 2025 N-1	Executed FTE as of 31/12/2025 N-1	Headcount as of 31/12/2025 N-1	FTE corresponding to authorised budget 2026 N	FTE corresponding to authorised budget 2027 N+1	FTE corresponding to authorised budget 2028 N+2	FTE corresponding to authorised budget 2029 N+3
Function group IV	46*	40	40	42**	43***	43	43
Function group III	8	7	7	8	8	8	8
Function group II	-	-	-	-	-	-	-
Function group I	-	-	-	-	-	-	-
<b>TOTAL</b>	<b>54*</b>	<b>47</b>	<b>47</b>	<b>50**</b>	<b>51***</b>	<b>51</b>	<b>51</b>

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

\*\* 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 and including the request of 1 additional CA FG/IV for posts needed for addressing challenges/avoid delays (Cybersecurity).

### Overview Seconded National Experts (SNEs) (with EMIR)

Seconded National Experts	FTE corresponding to authorised budget 2025 (N-1)	Executed FTE as of 31/12/2025 (N-1)	Headcount as of 31/12/2025 (N-1)	FTE corresponding to authorised budget 2026 (N)	FTE corresponding to authorised budget 2027 (N+1)	FTE corresponding to authorised budget 2028 (N+2)	FTE corresponding to authorised budget 2029 (N+3)
<b>TOTAL</b>	<b>20</b>	<b>15</b>	<b>15</b>	<b>20*</b>	<b>21</b>	<b>21</b>	<b>21</b>

\* The EBA has 19 “structural cost paid SNEs” + 1 SNE fee funded for EMIR (to be hired in 2026) + 1 as per the request for additional posts. The EBA also relies on 7 cost-free SNE as of year-end 2025.

## Table 3 –Recruitment forecasts 2027 (N+ 1) following retirement / mobility or new requested posts

(Information on the entry level for each type of posts)

Job title in the Agency	Type of contract (Official, TA or CA)	TA/Official		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	New post requested due to additional tasks	Internal (brackets)	External (brackets)	
Head of Department	TA		AD12 – AD14	AD12	n/a
Head of Unit	TA		AD9 - AD12	AD9 - AD10	n/a
AD8 – Senior Expert	TA		AD7 – AD12	AD8	n/a
AD7 – Senior Expert	TA		AD5-AD7	AD7	n/a
AD6 – Expert	TA		AD5-AD7	AD6	n/a
AD5 – Expert	TA		AD5-AD7	AD5	n/a
AST4 – Senior Assistant	TA		AST4 – AST9	AST4	n/a

AST1 – Assistant	TA	AST1 – AST3	AST2	n/a
FGIV – Specialist	CA	n/a	n/a	IV
FGI-III - Assistant	CA	n/a	n/a	I-II-III

Note: Recruitments to fill current vacancies and usual turn-over are planned till end of 2027. Specific recruitments from MiCA fee funded posts allocation will be planned/carried out gradually depending on ART/EMT market development. These recruitments will be carried out accordingly to the entry grade as defined by the Staff Regulations.

## ANNEX V: HUMAN RESOURCES - QUALITATIVE

[Update ongoing but incomplete]

### 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 experts**<sup>21</sup>: 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 website.<sup>22</sup>

**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 providers**<sup>23</sup>: 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.

<sup>21</sup> SNEs are not employed by the agency.

<sup>22</sup> <https://eba.europa.eu/about-us/careers/national-experts-on-secondment>.

<sup>23</sup> 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.

### 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 with different institutions such as ESMA, EIOPA, DG FISMA, ECB, MFSA and Bank of England (compared to 14 in 2014.)

## 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 TAs and 33% female vs 67% male for CAs, with a good distribution across departments ( 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 TA staff met the indicative duration of career per type of post and grade. For CA, 2 exceptions (both missing 0.3y to meet the desired seniority) were made in the FGIV/13 and FGIV/14 grade groups due to excellent performance.

**Table - Reclassification of TA**

Grades	2021 (N-5)	2022 (N-4)	2023 (N-3)	2024 (N-2)	2025 (N-1)	2026 (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
AST1	-	-	-	-	-		-	3.0
AST2	-	-	-	3.0	-		3.0	3.0
AST3	-	-	-	4.3	5.5		4.9	3.0
AST4	-	-	-	-	-		-	3.0

Grades	2021 (N-5)	2022 (N-4)	2023 (N-3)	2024 (N-2)	2025 (N-1)	2026 (N)	Actual average over 5 years*	Average over 5 years (According to decision C(2015)9563)**
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 2026 will only become available later, the averages are based on years 2021 to 2025.

\*\*Reclassification averages are not lower than with the average guiding seniority per grade in the Commission Decision.

**Table - Reclassification of contract staff**

Function Group	Grade	Staff in activity at 1.01.2024 (N-2))	How many staff members were reclassified in 2025 (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	4	-	-	Between 6 and 10 years
	16	6	1	5.2	Between 5 and 7 years
	15	11	2	4.1	Between 4 and 6 years
	14	12	2	3.0	Between 3 and 5 years
	13	8	1	2.7	Between 3 and 5 years
CA III	11	1	-	-	Between 6 and 10 years
	10	3	-	-	Between 5 and 7 years
	9	1	-	-	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

## 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](https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/gender-equality/gender-equality-strategy_en)<sup>24</sup> 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.

<sup>24</sup> [https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/gender-equality/gender-equality-strategy\\_en](https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/gender-equality/gender-equality-strategy_en).

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.

**Table 1 - Data on 31/12/2025 (Year N-1) of Statutory Staff (TAs and CAs)**

		Temporary		Contract agents		Grand Total	
		Staff	%	Staff	%	Staff	%
<b>Female</b>	Administrator level	66	40.0%	24	51.1%	90	42.5%
	Assistant level (AST & AST/SC)	6	3.6%	6	12.8%	12	5.7%
	<b>Total</b>	<b>72</b>	<b>43.6%</b>	<b>30</b>	<b>63.8%</b>	<b>102</b>	<b>48.1%</b>
<b>Male</b>	Administrator level	88	53.3%	16	34.0%	104	49.1%
	Assistant level (AST & AST/SC)	5	3.0%	1	2.1%	6	2.8%
	<b>Total</b>	<b>93</b>	<b>56.4%</b>	<b>17</b>	<b>36.2%</b>	<b>110</b>	<b>51.9%</b>
<b>Grand total</b>		<b>165</b>	<b>100.0%</b>	<b>47</b>	<b>100.0%</b>	<b>212</b>	<b>100.0%</b>

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

	2021 (Year N-5)		2025 (Year N-1)	
	Number	%	Number	%
<b>Female managers</b>	9	39.1%	10	43.5%
o.w. EBA Directors	2	50.0%	3	60.0%
<b>Male managers</b>	14	60.9%	13	56.5%

## 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 31/12/2025 (Year N-1)– statutory staff only (TAs and CAs) – statutory staff only (TAs and CAs)**

Nationality	AD + CA FG IV		AST/SC- AST + CA FGI-III		TOTAL	
	Number	% of total staff members in AD and FG IV categories	Number	% of total staff members in AST SC/AST and FG I- III categories	Number	% of total staff
Austria	3	1.5%	1	5.6%	4	1.9%
Belgium	4	2.1%	2	11.1%	6	2.8%
Bulgaria	3	1.5%	1	5.6%	4	1.9%
Croatia	3	1.5%	-	-	3	1.4%
Cyprus	3	1.5%	-	-	3	1.4%
Czech Republic	-	-	1	5.6%	1	0.5%
Denmark	1	0.5%	-	-	1	0.5%
Estonia	3	1.5%	-	-	3	1.4%
Finland	4	2.1%	1	5.6%	5	2.4%
France	25	12.9%	2	11.1%	27	12.7%
Germany	10	5.2%	1	5.6%	11	5.2%
Greece	11	5.7%	-	-	11	5.2%
Hungary	4	2.1%	-	-	4	1.9%
Ireland	3	1.5%	-	-	3	1.4%
Italy	43	22.2%	1	5.6%	44	20.8%
Latvia	2	1.0%	-	-	2	0.9%
Lithuania	4	2.1%	-	-	4	1.9%
Luxembourg	2	1.0%	-	-	2	0.9%
Malta	1	0.5%	-	-	1	0.5%
Netherlands	4	2.1%	-	-	4	1.9%
Poland	6	3.1%	4	22.2%	10	4.7%
Portugal	12	6.2%	-	-	12	5.7%
Romania	13	6.7%	1	5.6%	14	6.6%
Slovakia	2	1.0%	-	-	2	0.9%
Slovenia	2	1.0%	-	-	2	0.9%
Spain	20	10.3%	2	11.1%	22	10.4%
Sweden	1	0.5%	1	5.6%	2	0.9%
United Kingdom	5	2.6%	-	-	5	2.4%
<b>TOTAL</b>	<b>194</b>	<b>100%</b>	<b>18</b>	<b>100%</b>	<b>212</b>	<b>100%</b>

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

Most represented nationality	2021 (N-5)		2025 (N-1)	
	Number	%	Number	%
Italian	34	16.8%	44	20.8%

## 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 25 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 2025-2026:

Education system level	# children
Nursery: up to 4 years old	36
Maternelle: more than 4 years old and up to 6 years old	14
Primary: More than 6 years old and less than 11 years old	50
Secondary: More than 11 years old and less than 19 years old	56
Total	156



## 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 2027, including the targeted status by year end 2027. 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
Managed Network Services	Open	Framework (4 years)	6 000 000	Yes	Tendering
Corporate support consultancy	Open	Framework (4 years)	2 000 000	Yes	Signed
Environmental and EMAS consultancy	Open	Framework (4 years)	800 000	Yes	Signed
Catering services	Open	Framework (4 years)	800 000	No	Signed
Language training	Open	Framework (4 years)	660 000	Yes	Signed
Building maintenance	Open	Framework (4 years)	550 000	No	Signed
Communications consultancy	Open	Framework (4 years)	425 000	Yes	Tendering
Mobile telephony services	Open	Framework (4 years)	225 000	No	Evaluating
Crypto-assets market data	Open	Framework (4 years)	150 000	No	Signed
Water dispensers	Negotiated	Framework (4 years)	20 000	No	Signed
Building lease	Exceptionally negotiated	Direct	40 000 000	No	Signed
Bank guarantee	Negotiated	Direct	20 000	No	Signed
Office fit-out: project management [depending on outcome of Lease procurement]	Open	Framework (4 years)	600 000	Possible	Signed

For contracts ending in 2027 or the first half of 2028 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 2027.

## 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:

- 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 since 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	CB.1.	Set up environmental objectives for the majority of staff
BUILDING	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
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 on 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 <sup>25</sup> square metres	1 408 <sup>26</sup> square metres	Net office space: 5 403 square metres	EUR 561 <sup>27</sup> per square metre  Annual cost = EUR 3 030 416	9-year	Lease contract	Y	The contractual period for exercising the breakout 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.

<sup>25</sup> Reception / Lobby 184 m2; Meeting rooms - Visitors 533 m2; Internal meeting rooms 346 m2; Storage / Print rooms/ Corridors 695 m2; Break out area visitors 192 m2; Break out area staff 98 m2; Open Plan (including individual offices) 1,947 m2.

<sup>26</sup> 1,341 m2 shared areas including lift banks, 67 m2 archives (at basement level minus 4).

<sup>27</sup> 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

- Importation of personal effects including motor vehicles free of customs duty and VAT
- Special vehicle registration
- A special residence permit

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.

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.

For children who do not attend this school, education allowances are determined and paid when due.

## 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<sup>28</sup>.

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 websites<sup>29</sup>). 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.

<sup>28</sup> [https://finance.ec.europa.eu/system/files/2022-05/220523-esas-operations-report\\_en.pdf](https://finance.ec.europa.eu/system/files/2022-05/220523-esas-operations-report_en.pdf).

<sup>29</sup> 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](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 units:

- 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 comprises three 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 responsibilities in the risk and compliance areas, in particular ethics, data protection, risk management, 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 2027 to 2029, 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 <sup>1</sup>					Financial and HR impacts				
	Actual or expected date of signature	Total amount	Duration	Counterpart	Short description		2026 Year N	2027 Year N+1	2028 Year N+2	2029 Year N+3
Grant agreements										
....						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										
....						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
Service-level agreements										
1. EU Supervisory Digital Finance Academy	Q1 2025	736,556	Four years	SG REFORM	Providing support to 20 Member States to strengthen supervisory capacity in the area of innovative digital finance	Amount	233 354	244 218	177 186	
						Number of CA	2	2	2	
						Number of SNEs				
Total service level agreements						Amount	233 354	244 218	177 186	
						Number of TA				
						Number of CA	2	2	2	
						Number of SNEs				
TOTAL						Amount	233 354	244 218	177 186	
						Number of TA				
						Number of CA	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) MiCAR, 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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