

EBA/Rep/2026/18

08/07/2026

Final Report

Draft Implementing Technical Standards on the implementation of IFRS 18 in supervisory financial reporting (FINREP) under Article 430 (7) of Regulation (EU) No 575/2013

Table of Contents

Final Report	1
1. Executive Summary	3
Next steps.....	3
2. Background and rationale	4
2.1. IFRS 18: implementation in FINREP	5
2.1.1. IFRS 18: new banks' structure of Statement of profit or loss	5
2.1.2. Changes to the FINREP templates.....	6
3. Accompanying documents.....	14
3.1. Draft cost-benefit analysis/impact assessment.....	14
3.1.1. Problem identification and background.....	14
3.1.2. Policy objectives.....	14
3.1.3. Options considered, assessment of the options and preferred options	14
3.1.4. Conclusion.....	18
3.2. Examples for the reporting in selected templates	20
3.3. Feedback on the public consultation.....	29
3.3.1 Summary of key issues and the EBA's response	29
3.3.2 Summary of responses to the consultation and the EBA's analysis.....	31

1. Executive Summary

This report puts forward the final version of the templates mainly affected by the implementation of IFRS 18 in FINREP. These templates will be part of the final draft ITS on supervisory financial reporting amending Commission Implementing Regulation (EU) 2024/3117 referred to in Article 430 (7) of Regulation (EU) No 575/2013. The latter is still under public consultation until 10 July 2026.

In April 2024, the International Accounting Standards Board (IASB) issued 'IFRS 18 - Presentation and Disclosure in Financial Statements', which supersedes the accounting standard 'IAS 1 - Presentation of Financial Statements'. The new IFRS 18 standard has been endorsed by Commission Regulation (EU) 2026/338. It will be mandatory for public consolidated financial statements of institutions using the IFRS from the reporting periods beginning on or after 1 January 2027.

After the endorsement of IFRS 18 in the EU, changes to FINREP are therefore required in line with the EBA's original choice to align supervisory financial information with the accounting standards to achieve efficient regulation and avoiding different reporting requirements with institutions' public financial statements.

Key aspects of the proposals related to the implementation of IFRS 18 in FINREP are:

- reshaping of the Statement of Profit or Loss (F 02.00) based on the business model of a retail and investment bank as benchmark to ensure a standardised presentation;
- maintenance of the current level of information within the 'operating category' of the Statement of Profit or Loss (F 02.00), in line with the expectation that most of income and expenses of a retail and investment bank will be included in the 'operating performance';
- introduction of a more aggregated representation of income and expenses that are not related to the institution's main business activities within the investing and financing categories of the Statement of Profit or Loss (F 02.00);
- maintenance of the current breakdown of income and expenses in templates F 16 and F 45, regardless of the institutions' business models.

Next steps

This Final Report will be merged with the Report on the Final Draft ITS amending Commission Implementing Regulation (EU) 2024/3117 on financial information that is under public consultation until 10 July 2026. The latter will be submitted to the European Commission and they are expected to apply from the end of September 2027.

The data point model (DPM) and the XBRL taxonomy based on these revised templates for the implementation of IFRS 18 will be published by the end of July 2026, or at latest at the beginning of September 2026.

2. Background and rationale

1. In accordance with Article 430(3) and (4) of the CRR, the reporting on financial information (FINREP) applies to credit institutions required to prepare their consolidated financial statements in accordance with International Financial Reporting Standards (IFRS) as endorsed by the EU, as well as to credit institutions required by supervisors to use IFRS as endorsed by the EU for the determination of own funds and to investment firms subject to Article 4 of Regulation (EC) 1606/2002. The EBA originally chose to base the reporting of financial information (FINREP) on accounting standards to achieve efficient regulation by aligning supervisory reporting of financial information with accounting standards. Therefore, FINREP needs to be reviewed whenever the underlying international accounting standards adopted in accordance with Article 6(2) of Regulation (EC) 1606/2002 are updated.
2. In April 2024, the International Accounting Standards Board (IASB) issued 'IFRS 18 - Presentation and Disclosure in Financial Statements', which supersedes the accounting standard 'IAS 1 - Presentation of Financial Statements'. IFRS 18 introduces a defined structure for the Statement of profit or loss, where the items are classified into three new main categories (operating, investing and financing) with the aim of increasing comparability and transparency of entities' performance reporting. The new IFRS 18 standard has been endorsed by Commission Regulation (EU) 2026/338. It will be mandatory for public consolidated financial statements of institutions using the IFRS from the reporting periods beginning on or after 1 January 2027.
3. After the issuance of IFRS 18, changes therefore became required to the existing FINREP reporting templates and related instructions for IFRS reporters to harmonise FINREP with IFRS 18 and avoid different reporting requirements with institutions' public financial statements.
4. The timely implementation of IFRS 18 in FINREP will significantly reduce the risk of double or divergent reporting for IFRS institutions, as EFRAG also highlighted in its endorsement advice to the EU Commission in May 2025: 'For financial institutions, the costs to be incurred, both one-off and ongoing, depend entirely on the level and timing of potential harmonisation of the local regulatory requirements with those of IFRS 18. Financial institutions are subject to FINREP reporting requirements. Unless FINREP is harmonised with IFRS 18, they would be subject to different reporting requirements/double reporting requirements'.
5. Considering the importance of a timely implementation, a shorter one-month public consultation was provided for the templates and instructions mainly affected by IFRS 18, with the aim of publishing their final draft versions over the summer 2026, although their formal adoption by the EU Commission and publication in the Official Journal will take place with the broader ITS published for consultation on 10 April 2026. This should reduce the risk of double or divergent reporting for institutions implementing IFRS 18 in their public consolidated financial statements from the reporting periods beginning on or after 1 January 2027.

6. This Final Report covers only the changes to the FINREP templates mainly affected by the IFRS 18 implementation (i.e. F 02.00, F 16.01, F 16.02, F 16.03, F 16.04, F 16.04.1, F 16.05, F 16.06, F 16.07, F 45.02, F 45.03, F 20.03). It does not contain the final draft ITS, since the latter will also depend on the outcome of the public consultation on the other parts of FINREP that ends on 10 July 2026. This Final Report will therefore be merged with the Final Report on the draft implementing standards amending Commission Implementing Regulation (EU) 2024/3117 that will be submitted for adoption by the Commission. The technical standards are expected to apply from September 2027.

2.1. IFRS 18: implementation in FINREP

2.1.1. IFRS 18: new banks' structure of Statement of profit or loss

7. IFRS 18 introduces a defined structure for the Statement of profit or loss, which is composed of five categories, three of which are new (operating, investing, and financing), and of mandatory subtotals. IFRS 18 sets out detailed requirements for entities to classify the items among these categories.
8. IFRS 18 considers the specific characteristics of entities whose main business activities are providing financing to customers and/or investing in assets (retail and investment banks) by requiring the classification of additional income and expenses in the 'operating category' that would otherwise be classified in the investing or financing categories.
9. In accordance with the new standard, each bank shall assess, based on its specific facts and circumstances, whether its investments in financial or non-financial assets are part of its main business activities, and shall classify accordingly the income and expenses in the three new categories (operating, investing and financing).
10. The operating category shall include all the income and expenses related to the main business activities of the institution.
11. The investing category includes income and expenses relating to investments in assets that are not considered as main business activities, as well as the results of associates, joint ventures and unconsolidated subsidiaries accounted for using the equity method (IFRS 18.55(a)).
12. The financing category includes income and expenses from liabilities arising from transactions that do not only involve the raising of finance (IFRS 18.59(b); IFRS 18.61; IFRS 18.B53-B54), such as interest expenses on lease liabilities, the increase in the discounted amount of a provision arising from the passage of time, and net interest expense (income) on a net defined benefit liability (asset) applying IAS 19.
13. With regard to the income and expenses from cash and cash equivalents and from liabilities arising from transactions that involve only the raising of finance ('financing liabilities'), IFRS 18

allows banks to classify these outside the operating category, provided that they do not relate to the bank's main business activity of providing financing to customers. However, in case of a retail and investment bank which also invests in financial assets as main business activity, all income and expenses from cash and cash equivalents and from financing liabilities are presumably classified in the operating category.

14. IFRS 18 also provides guidance for the classification of income and expenses arising from hybrid contracts, income and expenses arising from derecognition and changes in classification, foreign exchange differences, and gains or losses on derivatives and hedging instruments. In such circumstances, the income and expenses shall be generally classified in the same category of the income and expenses to which they refer. For banks, this implies that most of these items are classified in the operating category.
15. IFRS 18 eventually introduces two new mandatory subtotals on the face of statement of profit or loss: 'operating profit or loss' and 'profit or loss before financing and income taxes'. However, the latter shall not be presented if a bank chooses to classify income and expenses from all financing liabilities in the operating category (IFRS 18.73 and IFRS 18.BC189). Additional items and subtotals can be included if such presentations are necessary for a primary financial statement to provide a 'useful structured summary' of the institution's income and expenses (IFRS 18.24).

2.1.2. Changes to the FINREP templates

16. The FINREP Statement of profit or loss is reshaped with the aim of minimizing the impact of the IFRS 18 implementation by requesting, to the extent possible, the same level of information as today, while ensuring a standardised presentation for all banks. To this end, the main business activities of an investment and retail bank are considered as a benchmark for reshaping the Statement of profit or loss, in line with the IFRS 18 Illustrative Example II-4 'Statement of profit or loss for an entity that is an investment and retail bank that invests in financial assets as a main business activity and provides financing to customers as a main business activity' (IFRS 18, IE 13).
17. Following the benchmark model of a retail and investment bank, the income and expenses related to investments in subsidiaries, joint ventures and associates, investments properties and other non-financial assets (different from property, plant and equipment) can be classified in the operating or the investing categories depending on the bank's assessment of main business activities.
18. In the operating category, the instructions and the labels of some items are reviewed to clarify that they only include income and expenses related to the main business activities of a bank. The 'accounting policy choice' provided by IFRS (IFRS 18, paragraphs 56, 57, 65(a) and 66) is not available for the purpose of reporting the information in the FINREP Statement of profit or loss, regardless of the institution's business models. Therefore, income and expenses on cash,

cash balances at central banks and other demand deposits and on all liabilities that arise from transactions that involve only the raising of finance shall be classified in the operating category to ensure a uniform presentation for all banks.

19. In the investing category, the income or expenses are grouped in the following new items: i) 'Income or (-) expenses on investing financial assets'; 'Income or (-) expenses on investments in subsidiaries, joint ventures and associates, investment properties and other investing non-financial assets'; ii) 'Profit or (-) loss from investing non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations'. The item 'Income or (-) expenses on investing financial assets' bundles income and expenses related to a bank only provides financing to customers as main business activities. In such circumstances, the income and expenses related to its investments in financial assets cannot be reported in the specific rows of the operating category, but they will be presented in the investing category. The item 'Income or (-) expenses on investments in subsidiaries, joint ventures and associates, investment properties and other investing non-financial assets' bundles instead income and expenses related to non-financial assets that are not assessed as main business activities of the bank. In that case, the specific rows for income and expenses on non-financial assets within the operating category will not be reported.
20. In the financing category, the new item of 'Income or (-) expenses on non-operating liabilities' shall include income and expenses arising from liabilities that are not related to the bank's main business activities, such as interest expenses on trade payables, changes in the carrying amount of a provision reflecting the passage of time, the effect of any change in the discount rate on provisions, the net interest expense (income) on a net defined benefit liability (asset), and the lessee's interest expenses on the lease liability.
21. With regard to the IFRS 18 other requirements on derivatives and hedge accounting, foreign exchange differences, hybrid contracts, derecognition and change in use, most of the related income and expenses should refer to items in the bank's operating category. For this reason, the existing relevant rows of template F 02.00 are kept under the operating category. This approach aims at ensuring continuity with the past. However, should these income and expenses refer to items outside the operating category, FINREP instructions specify which rows to use. Residual rows are provided under the investing category ('Other income or (-) expenses on investing financial assets' and 'Other income or (-) expenses on investing non-financial assets) to include amounts that are not reported in specific items.
22. As regards the subtotals, the IFRS 18 mandatory subtotal of 'operating profit or loss' is added on the face of the statement of profit or loss, while the IFRS 18 subtotal 'Profit or loss before financing and income taxes' is not provided consistently with the FINREP choice to classify income and expenses from all financing liabilities in the operating category (IFRS 18.73; IFRS 18.BC189). Furthermore, the existing subtotal 'Total operating income, net' is kept and a new subtotal 'operating and investing profit or loss' is included to provide a 'useful structured summary' of the institution's income and expenses.

23. Templates F 16 and F 45 are also reviewed to reflect the changes of IFRS 18. Specifically, columns for the new categories of operating, investing and financing are added to allow banks to report the same level of information as today, regardless of where the information is presented in the Statement of profit or loss. The aim is to keep the same level of granularity as today, regardless of the banks' assessment of main business activities. Therefore, even when the information is aggregated and presented in the new items within the investing and financing categories of the template F 02, institutions shall keep reporting the details of the information as today in templates F 16 and F 45.
24. As per article 430(9) of the CRR, FINREP includes templates and instructions for reporting financial information under national Generally Accepted Accounting Principles (GAAP) as well. The changes to the FINREP framework stemming from IFRS 18 do not have any major impact for NGAAP reporters. Therefore, NGAAP reporters will continue to present the information on income and expenses as today, in accordance with the provisions of the applicable Banking Accounting Directive (BAD).
25. The following table shows a reconciliation between the current rows of FINREP template F 02.00 (version 3.0) with the rows of the final draft version of the template F 02.00 due to the implementation of IFRS 18 to facilitate the reading of the changes.

Table 1. Reconciliation between the current template F 02.00 and the final draft version of template F 02.00 due to the implementation of IFRS 18

F 02.00 (version 3.0)		F 02.00 (final draft version 4.4)		Change type
Row	Label	Row	Label	
0080	Interest income on other assets	0081	Interest income on other operating assets	IFRS: Label and instructions changed
0140	(Interest expense on other liabilities)	0141	(Interest expense on other operating liabilities)	IFRS: Label and instructions changed
0192	Dividend income on Investments in subsidiaries, joint ventures and associates accounted for using other than equity method	0192	Dividend income on Investments in subsidiaries, joint ventures and associates accounted for using other than equity method	NGAAP: no change IFRS: item reported if the investments are part of the institution's 'main business activities'
0320	Gains or (-) losses on derecognition of investments in subsidiaries, joint ventures and associates, net	0320	Gains or (-) losses on derecognition of investments in subsidiaries, joint ventures and associates, net	NGAAP: no change IFRS: item reported if the investments are part of the institution's 'main business activities'
0330	Gains or (-) losses on derecognition of non-financial assets, net	0330	Gains or (-) losses on derecognition of non-financial assets, net	NGAAP: no change IFRS: item reported only for non-financial assets that are part of the institution's 'main business activities'
0340	Other operating income	0340	Other operating income	NGAAP: no change IFRS: instructions added
0350	(Other operating expenses)	0350	(Other operating expenses)	NGAAP: no change IFRS: Instructions added
0355	TOTAL OPERATING INCOME, NET	0355	TOTAL OPERATING INCOME, NET	Kept the existing subtotal
0410	(Depreciation on investment property)	0410	(Depreciation on investment property)	NGAAP: no change IFRS: item reported if the investments are part of the

			institution's 'main business activities'
0420	(Depreciation on other intangible assets)	0420	(Depreciation on other intangible assets) NGAAP: no change
		0421	(Depreciation on intangible assets) IFRS: label changed
0510	(Impairment or (-) reversal of impairment of investments in subsidiaries, joint ventures and associates)	0510	(Impairment or (-) reversal of impairment of investments in subsidiaries, joint ventures and associates) NGAAP: no change IFRS: item reported if the investments are part of the institution's 'main business activities'
0540	(Impairment or (-) reversal of impairment of investment property)	0540	(Impairment or (-) reversal of impairment of investment property) NGAAP: no change IFRS: item reported if the investment properties are part of the institution's 'main business activities'
0560	(Impairment or (-) reversal of impairment of other intangible assets)	0560	(Impairment or (-) reversal of impairment of other intangible assets) NGAAP: no change
		0561	(Impairment or (-) reversal of impairment of intangible assets) IFRS: label changed
0570	(Impairment or (-) reversal of impairment of other)	05070	(Impairment or (-) reversal of impairment of other) NGAAP: no change IFRS: item reported for other non-financial assets different from the above (e.g. commodities) that are part of the institution's 'main business activities'
600	Profit or (-) loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations	0581	Profit or (-) loss from operating non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations IFRS: new item for non-current assets and disposal groups that generate income and expenses classified in the 'operating category' immediately before the classification as held for sale

	0582	OPERATING PROFIT or LOSS	IFRS: new IFRS 18 mandatory subtotal
0590		Share of the profit or (-) loss of investments in subsidiaries, joint ventures and associates accounted for using the equity method	Share of the profit or (-) loss of investments in subsidiaries, joint ventures and associates accounted for using the equity method NGAAP: no change IFRS: mandatory in the investing category
	0591	Income or (-) expenses on investing financial assets	IFRS: new aggregating item to report the income and expenses on investments in financial assets for banks providing only financing to customers
	0592	Interest income on investing assets and on any related financial instruments	IFRS: interest on investments in financial assets for banks providing only financing to customers
	0593	(Interest expense on investing assets and on any related financial instruments)	IFRS: interest on investments in financial assets for banks providing only financing to customers
	0594	Gains or (-) losses on derecognition of investing financial assets and of any related financial instruments not measured at fair value through profit or loss, net	IFRS: derecognition on investments in financial assets for banks providing only financing to customers
	0595	Gains or (-) losses on investing financial assets and of any related financial instruments measured at fair value through profit or loss, net	IFRS: remeasurement and derecognition on investments in financial assets for banks providing only financing to customers
	0596	Gains or (-) losses from hedge accounting related to investing assets, net	IFRS: hedge accounting on investments in financial assets for banks providing only financing to customers

		Impairment or (-) reversal of impairment on investing financial assets not measured at fair value through profit or loss	IFRS: impairment on investments in financial assets for banks providing only financing to customers
	0597		
		Other income or (-) expenses on investing financial assets	IFRS: residual item on investments in financial assets for banks providing only financing to customers
	0598		
		Income or (-) expenses on investments in subsidiaries, joint ventures and associates, investment properties and other investing non-financial assets	IFRS: new aggregating item for income and expenses on non-financial assets that are not assessed as institution's main business activities
	0599		
		(Impairment or (-) reversal of impairment on investing non-financial assets)	IFRS: impairment on non-financial assets that are not assessed as institution's main business activities
	0601		
		Gains or (-) losses on derecognition of investing non-financial assets, net	IFRS: derecognition on non-financial assets that are not assessed as institution's main business activities
	0602		
		Other income or (-) expenses on investing non-financial assets	IFRS: residual item on non-financial assets that are not assessed as institution's main business activities
	0603		
600		Profit or (-) loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations	IFRS: new item for non-current assets and disposal groups that generate income and expenses all classified in the 'investing category' immediately before the classification as held for sale
	604		
		OPERATING and INVESTING PROFIT or LOSS	IFRS: new subtotal that is the sum of the items within the operating and the investing categories
	0605		
		Income or (-) expenses on non-operating liabilities	IFRS: new item for the financing category
	0606		

3. Accompanying documents

3.1. Draft cost-benefit analysis/impact assessment

As per Article 15 of Regulation (EU) No 1093/2010 (EBA Regulation), any draft implementing technical standards (ITS) developed by EBA shall be accompanied by an Impact Assessment (IA), which analyses ‘the potential related costs and benefits’.

This analysis presents the IA of the main policy options on the implementation of IFRS 18 included in this Final Report on the draft ITS amending Commission Implementing Regulation (EU) 2024/3117 on supervisory reporting referred to in Article 430 (7) of Regulation (EU) No 575/2013 concerning financial information (‘the draft ITS’). The analysis provides an overview of the identified problems, the proposed options to address this problem as well as the potential impact of these options. The IA is high level and qualitative in nature.

3.1.1. Problem identification and background

Article 430(7) of the Regulation (EU) No 575/2013 (‘the CRR’) mandates the EBA to ‘*develop draft implementing technical standards to specify the uniform reporting formats and templates, the instructions and methodology on how to use those templates, the frequency and dates of reporting, the definitions and the IT solutions for the reporting (...)*’. Under this mandate the EBA developed draft ITS, published by the Commission under the Commission Implementing Regulation (EU) 2024/3117 (‘CIR 2024/3117’) This regulation shall be updated whenever the underlying legal provisions change and in relation to the evolving supervisory needs.

The EBA originally chose to base the reporting of financial information (FINREP) on IFRS accounting standards. In April 2024, the International Accounting Standards Board (IASB) issued ‘IFRS 18 - Presentation and Disclosure in Financial Statements’, which supersedes the accounting standard ‘IAS 1 -Presentation of Financial Statements’ and introduces a defined structure for the Statement of profit or loss. Therefore, an adaptation of the CIR 2024/3117 (i.e. in this case FINREP templates and instructions’ part) is necessary.

3.1.2. Policy objectives

The draft ITS amending Commission Implementing Regulation (EU) 2024/3117 on supervisory reporting referred to in Article 430 (7) of Regulation (EU) No 575/2013 concerning financial information aims at specifying FINREP uniform formats and definitions related to the changes triggered by IFRS 18.

3.1.3. Options considered, assessment of the options and preferred options

This section presents the main policy options discussed and the decisions made by the EBA during the development of the Draft ITS. Advantages and disadvantages, as well as potential costs and

benefits from the qualitative perspective of the policy options and the preferred options resulting from this analysis, are provided.

Implementation of IFRS 18

As mentioned above, the International Accounting Standards Board (IASB) issued 'IFRS 18 - Presentation and Disclosure in Financial Statements' in April 2024. This new standard has been endorsed by Commission Regulation (EU) 2026/338, and it will be applicable for reporting periods beginning on or after 1 January 2027. Regarding the modification – in the Draft ITS – of FINREP templates and instructions, the EBA considered two options.

Option 1a: Not incorporating IFRS 18 in the FINREP templates

Option 1b: Incorporating IFRS 18 in the FINREP templates

Not incorporating IFRS 18 into the FINREP templates would avoid certain implementation costs for IFRS reporting institutions. These costs arise primarily from different scopes of consolidation: for institutions using IFRS for consolidated public financial statements, the accounting scope of consolidation may diverge from FINREP's prudential one and thus institutions would need to implement procedures to reprocess IFRS-based information accordingly, resulting in initial one-off costs. Moreover, FINREP requires quarterly reporting, whereas public financial statements are typically disclosed less frequently, leading to increased ongoing costs. These burdens are not unique to IFRS 18 but apply more broadly to the implementation of IFRS requirements into FINREP. For N-GAAP institutions, the changes due to the IFRS 18 implementation are not applicable, therefore there is no impact on them.

However, implementing IFRS 18 into FINREP would significantly reduce the risk of double or divergent reporting requirements for IFRS institutions. As IFRS 18 becomes mandatory for public financial statements from the reporting period beginning on or after 1 January 2027, aligning FINREP with IFRS 18 would alleviate implementation costs and streamline reporting processes. This concern was also highlighted by EFRAG in its endorsement advice to the European Commission in May 2025: *'For financial institutions, the costs to be incurred, both one-off and ongoing, depend entirely on the level and timing of potential harmonisation of the local regulatory requirements with those of IFRS 18. Financial institutions are subject to FINREP reporting requirements. Unless FINREP is harmonised with IFRS 18, they would be subject to different reporting requirements / double reporting requirements.'* Furthermore, implementing IFRS 18 into FINREP is consistent with past practices and supports the broader objective of harmonizing supervisory financial reporting with international accounting standards. This approach enhances comparability, reduces duplication, and promotes regulatory efficiency across jurisdictions.

Based on the above, **option 1b has been chosen** as the preferred option, and the draft ITS will implement IFRS 18 into the FINREP supervisory reporting templates and related instructions.

Structure of FINREP Statement of profit or loss (F 02.00)

In FINREP, template F 02.00 corresponds to the 'statement of profit or loss' and is, as such, naturally concerned by IFRS 18. Regarding integration of IFRS 18 within this template, the EBA considered three options.

Option 2a: Retaining, as much as possible, the current structure of the template F 02.00 by considering, as reference, the IFRS 18 Illustrative Example No. 13 for a retail and investment bank

Option 2b: Developing different possible structures of template F 02.00 to be used in relation to the institutions' assessments of their main business activities

Option 2c: Considering a single structure of the template F 02.00 but duplicating all relevant rows under the three new categories provided by IFRS 18 (operating, investing, and financing), to reflect any different institutions' assessments of their main business activities

Developing different structures of template F 02.00 (Option 2b) or duplicating rows within a single template (Option 2c) would allow for a more tailored representation of income and expenses based on the specific business models of reporting institutions. These approaches could improve the relevance and transparency of the reported data for institutions whose activities differ significantly from those of a classic retail and investment bank as considered in the IFRS 18 Illustrative Example No. 13. However, they would also introduce complexity in the supervisory reporting framework, with the risk of reducing the standardisation having different ways of reporting the information of the income statement. This would also make the analysis and comparisons across institutions more complex.

By contrast, Option 2a – which retains, as much as possible, the current structure of template F 02.00 and uses the IFRS 18 Illustrative Example No. 13 as a reference – offers a more standardised and simplified approach. The existing line items within the operating category are kept on the basis of the business model of a typical retail and investment bank that should be the most common one. This ensures continuity with the existing FINREP structure, as most current line items have been preserved under the new subtotal of the operating profit or loss. Only a limited number of new data points have been added within the new categories of investing and financing, to comply with IFRS 18 requirements.

This approach is expected to facilitate the implementation by institutions, as it builds as much as possible on current reporting practices and supports the broader objective of harmonisation in supervisory reporting.

Nevertheless, the chosen approach introduces fewer details within the investing and financing categories under the assumption that most of the income and expenses of a standard retail and investment bank, taken as a reference to develop the new structure of template F 02.00, continue to be reported in the operating category. While this may reduce transparency in template F 02.00 and complicate comparisons across institutions in case of different business models, the loss of

transparency in template F 02.00 is mitigated by keeping the current breakdowns in templates F 16 and F 45 – regardless of the institutions’ business models – thanks to the addition of columns for the three new IFRS 18 categories (operating, investing and financing) in the latter templates.

Based on the above, **option 2a has been chosen** as the preferred option, and the draft ITS will retain the current structure of template F 02.00 as much as possible, using the IFRS 18 Illustrative Example No. 13 as a reference.

Subtotals in template F 02.00 (Statement of profit or loss’)

The EBA considered two options regarding the inclusion of new subtotals in template F 02.00:

Option 3a: In addition to new IFRS 18 mandatory subtotal ‘operating profit or loss’, including the current subtotal ‘total operating income, net’ and the new subtotal ‘operating and investing profit or loss’ in the template F 02.00

Option 3b: Including only the new IFRS 18 mandatory subtotal ‘operating profit or loss’

Retaining the current subtotal ‘operating income, net’ ensures continuity with current practice and consistency with current reporting. This subtotal is considered as a key metric, since it allows institutions’ performance to be isolated from their banking activities.

Including the new subtotal ‘operating and investing profit or loss’, although not mandatory under IFRS 18, provides a structured summary of institutions’ financial performance from operating and investing activities. This is particularly relevant given that certain income and expenses will be now classified outside the subtotal of ‘operating profit or loss’ in line with IFRS 18.

As such, despite the introduction of subtotals not strictly required by IFRS 18, tailoring the template with these subtotals enhances clarity and usefulness of financial reporting.

Based on the above, **option 3a has been chosen as the preferred approach**. The draft ITS will therefore include, in addition to new mandatory subtotal ‘operating profit or loss’, the current subtotal ‘operating income, net’ and the new subtotal ‘operating and investing profit or loss’.

Breakdown of Selected Statement of Profit or Loss Items (Templates F 16 and F 45)

Templates F 16 and F 45 provide detailed breakdowns of selected profit or loss items. With regard to IFRS 18 integration in those templates, the EBA considered two options.

Option 4a: Retaining the current structure of templates F 16 and F 45 with minor adjustments to row labels, considering the business model of a retail and investment bank as reference (like template F 02.00)

Option 4b: Adding new columns to consider the three new IFRS 18 categories – operating, investing, and financing – in templates F 16 and F 45 to capture any possible deviations from the

classic retail and investment bank business model used as a reference to develop the structure of the template F 02.00

Retaining the current structure with minor label adjustments (Option 4a) would maintain simplicity and continuity and be in line with the approach used in template F 02.00. However, this approach assumes that most institutions follow the retail and investment bank model. For institutions with different business models, certain income and expenses would be classified in more aggregated line items within the investing category of template F 02.00, and under Option 4a they would no longer be reported in templates F 16 and F 45, reducing transparency.

On the other hand, adding new columns for operating, investing, and financing (Option 4b) allows institutions to report detailed information regardless of their business model. This approach ensures that data classified under more aggregated items in template F 02.00 can still be captured in templates F 16 and F 45. While reconciliation between templates F 02.00 and F 16/F 45 may become more complex for non-standard business models, this impact is expected to be limited since most institutions follow the retail and investment bank model.

Based on the above, **option 4b has been chosen as the preferred option**. The draft ITS will therefore provide the inclusion of new columns for operating, investing, and financing categories in templates F 16 and F 45.

On the other hand, introducing a threshold of 5% (Option 8b) strikes the right balance between supervisory data needs and reporting costs for institutions. Specifically, the coverage of NBFIs exposures under this threshold would be acceptable, while minimizing the number of institutions subject to the requirement.

The frequency of reporting is kept quarterly in both options, considering that aggregated information on 'other financial corporations' included in templates F 04, F 08 and F 09 is already reported quarterly. Aligning the frequency for the disaggregated templates ensures consistency and comparability across the reporting framework.

Based on the above, **option 8b has been chosen as the preferred option**. The draft ITS will therefore require institutions to report the new templates F 27 quarterly only when their aggregate carrying amount of financial assets towards OFCs is equal to or higher than 5% of the sum of total carrying amount of financial assets included in the accounting portfolios.

3.1.4. Conclusion

The development of the draft ITS amending Commission Implementing Regulation (EU) 2024/3117 on supervisory reporting referred to in Article 430 (7) of Regulation (EU) No 575/2013 concerning financial information is intended to specify FINREP uniform formats and definitions related to the changes triggered by IFRS 18. The expected benefits – namely improved enhanced supervision, supervisory convergence and greater transparency – are expected to outweigh the costs.

3.2. Examples for the reporting in selected templates

Examples on reporting income and expenses in templates F 02.00, F 16 and F 45 following the IFRS 18 assessment of the institution's main business activities

Example 1

Bank A provides financing to customers and invests in financial assets as main business activities

Bank A provides financing to customers and invests in financial assets as main business activities. Bank A has a portfolio of debt securities towards non-financial corporations classified as held for trading and adopts a clean price approach to report the results of its portfolio.

During the reporting period T, the following results are reported in the IFRS 18-compliant templates:

- Gains for remeasurement of these instruments = CU + 50
- Interest income from these instruments = CU + 20

F 02.00 'Statement of profit or loss'

		Current period
0010	Interest income	20
0020	Financial assets held for trading	20
0025	Non-trading financial assets mandatorily at fair value through profit or loss	
0030	Financial assets designated at fair value through profit or loss	
0041	Financial assets at fair value through other comprehensive income	
0051	Financial assets at amortised cost	
0070	Derivatives - Hedge accounting, interest rate risk	
0081	Other operating assets	
0085	Interest income on liabilities	
0090	(Interest expenses)	
0100	(Financial liabilities held for trading)	
0110	(Financial liabilities designated at fair value through profit or loss)	
0120	(Financial liabilities measured at amortised cost)	
0130	(Derivatives - Hedge accounting, interest rate risk)	
0141	(Other operating liabilities)	
0145	(Interest expense on assets)	
0280	Gains or (-) losses on financial assets and liabilities held for trading, net	50

16.1 Interest income and expenses by instrument and counterparty sector

		Current period		
		Income		
		Operating	Investing	Financing
		<i>Annex V, Part 2.187, 189</i>		
		0010	0015	0016
0010	Derivatives - Trading			
0015	Of which: Interest income from derivatives in economic hedges			
0020	Debt securities	20		
0030	Central banks			
0040	General governments			
0050	Credit institutions			
0060	Other financial corporations			
0070	Non-financial corporations	20		

16.3 Gains or losses on financial assets and liabilities held for trading and trading financial assets and trading financial liabilities by instrument

		Current period		
		Operating	Investing	Financing
		<i>Annex V, Part 2.195-197</i>		
		0010	0020	0030
0010	Derivatives			
0015	Of which: Economic hedges with use of the fair value option			
0020	Equity instruments			
0030	Debt securities	50		
0040	Loans and advances			
0050	Short positions			
0060	Deposits			
0070	Debt securities issued			
0080	Other financial liabilities			
0090	GAINS OR (-) LOSSES ON FINANCIAL ASSETS AND LIABILITIES HELD FOR TRADING, NET	50		

Example 2

Bank B provides only financing to customers as main business activities

Bank B provides financing to customers as main business activities but does not invest in financial assets as main business activities. Bank B has a portfolio of debt securities towards non-financial corporations classified as held for trading and a clean price approach is adopted to report the results of its portfolio.

During the reporting period T, the following results are reported in the IFRS 18-compliant templates:

- Gains for remeasurement of these instruments = CU + 50
- Interest income from these instruments = CU + 20

F 02 'Statement of profit or loss'

		Current period
0582	OPERATING PROFIT or LOSS	
0590	Share of the profit or (-) loss of investments in subsidiaries, joint ventures and associates accounted for using the equity method	
0591	Income or (-) expenses on investing financial assets	70
0592	Interest income on investing assets and on any related financial instruments	20
0593	(Interest expense on investing assets and on any related financial instruments)	
0594	Gains or (-) losses on derecognition of investing financial assets and of any related financial instruments not measured at fair value through profit or loss, net	
0595	Gains or (-) losses on investing financial assets and of any related financial instruments measured at fair value through profit or loss, net	50
0596	Gains or loss from hedge accounting related to investing assets, net	
0597	Impairment or (-) reversal of impairment on investing financial assets not measured at fair value through profit or loss	
0598	Other income or (-) expenses on investing financial assets	

16.1 Interest income and expenses by instrument and counterparty sector		Current period		
		Income		
		Operating	Investing	Financing
		Annex V. Part 2.187, 189		
		0010	0015	0016
0010	Derivatives -Trading			
0015	Of which: Interest income from derivatives in economic hedges			
0020	Debt securities		20	
0030	Central banks			
0040	General governments			
0050	Credit institutions			
0060	Other financial corporations			
0070	Non-financial corporations		20	

16.3 Gains or losses on financial assets and liabilities held for trading and trading financial assets and trading financial liabilities by instrument		Current period		
		Operating	Investing	Financing
		Annex V. Part 2.195-197		
		0010	0020	0030
0010	Derivatives			
0015	Of which: Economic hedges with use of the fair value option			
0020	Equity instruments			
0030	Debt securities			
0040	Loans and advances		50	
0050	Short positions			
0060	Deposits			
0070	Debt securities issued			
0080	Other financial liabilities			
0090	GAINS OR (-) LOSSES ON FINANCIAL ASSETS AND LIABILITIES HELD FOR TRADING, NET		50	

In the IFRS 18-compliant template F 02.00, interest income and gains for remeasurement of the portfolio of debt securities classified as held for trading are reported both in row 0591 'Income or (-) expenses on investing financial assets and on any related financial instruments', and in row 0592 'Interest income on investing assets and on any related financial instruments' and row 0595 'Gains or (-) losses on investing financial assets and of any related financial instruments measured at fair value through profit or loss, net' respectively, since they are not related to Bank B's main business activities. The reporting of interest income and gains for remeasurement in templates F 16.01 and F 16.03 will be in the column 'Investing' (F 16.01 c0015 – F 16.03 c0020).

Example 3

Bank A provides financing to customers and invests in financial assets as main business activities. Investments in non-financial assets not assessed as main business activities pursuant to IFRS 18.

Bank A provides financing to customers and invests in financial assets as main business activities. Bank A invests in carbon credits and crypto-assets compliant with the IFRS-IC definition. These assets meet the definition of ‘intangible assets’ and they are accounted using the revaluation model of IAS 38. They are not assessed as institution’s main business activities following the provisions of IFRS 18.

During the reporting period T, the following results are reported in the IFRS 18-compliant templates:

- Changes in fair value in crypto-assets compliant with the IFRS-IC definition = CU + 10
- Gains on derecognition of carbon credits = CU + 30

F 02 ‘Statement of profit or loss’

		Current period
		0010
0582	OPERATING PROFIT or LOSS	
0590	Share of the profit or (-) loss of investments in subsidiaries, joint ventures and associates accounted for using the equity method	
0591	Income or (-) expenses on investing financial assets	
....	
0599	Income or (-) expenses on investments in subsidiaries, joint ventures and associates, investment properties and other investing non-financial assets	40
0601	(Impairment or (-) reversal of impairment on investing non-financial assets)	
0602	Gains or (-) losses on derecognition of investing non-financial assets, net	30
0603	Other income or (-) expenses on investing non-financial assets	10
0604	Profit or (-) loss from investing non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations	

In the IFRS 18-compliant template F 02.00, changes in fair value in crypto-assets compliant with the IFRS-IC definition and gains on derecognition of carbon credits are reported in row 0603 ‘Other income or (-) expenses on investing non-financial assets’ and in row 0602 ‘Gains or (-) losses on derecognition of investing non-financial assets, net’ respectively, since they are not related to Bank A’s main business activities. The sum of both items is reported in row 0599 ‘Income or (-) expenses on investments in subsidiaries, joint ventures and associates, investment properties and other non-financial assets’.

45.2 Gains or losses on derecognition of non-financial assets

		Current period	
		Annex V, Part 2.313	
		Operating	Investing
		0010	0020
0005	Investments in subsidiaries, joint ventures and associates		
0010	Property, Plant and Equipment		
0020	Investment property		
0030	Intangible assets		30
0040	Other assets		
0050	TOTAL		30

45.3 Other income and expenses

		Income		Expenses	
		Operating	Investing	Operating	Investing
		0010	0015	0020	0030
0005	Dividend income on investments subsidiaries, joint ventures and associates accounted for using other than equity method				
0010	Changes in fair value in tangible assets measured using the fair value model				
0015	Changes in fair value in intangible assets measured using the fair value model		10		
0020	Investment property				
0025	of which: depreciation on investment property				
0030	Operating Leases other than investment property				
0040	Other				
0045	of which: foreign exchange differences				
0050	OTHER INCOME OR EXPENSES		10		

The reporting of gains on derecognition and changes in fair value are respectively reported in templates F 45.02 and F 45.03 with the use of the column 'Investing' (F 45.02 c0020 – F 45.03 c0015).

Example 4

Bank A provides financing to customers and invests in financial assets as main business activities. Investment properties assessed as main business activities pursuant to IFRS 18.

Bank A provides financing to customers and invests in financial assets as main business activities. Bank A holds collaterals obtained by taking possession as a result of its credit recovery process. These non-financial assets are considered investment properties under IAS 40 and measured at cost model. They are related to Bank A's main business activities following the provisions of IFRS 18.

During the reporting period T, the following results are reported in the IFRS 18-compliant templates:

- Impairment of the investment properties = CU 10
- Depreciation on the investment properties = CU 8
- Gains on derecognition of the investment properties = CU + 30

F 02 'Statement of profit or loss'

		Current period
		0010
330	Gains or (-) losses on derecognition of non-financial assets, net	30
0340	Other operating income	
0350	(Other operating expenses)	
0355	TOTAL OPERATING INCOME, NET	
0360	(Administrative expenses)	
0370	(Staff expenses)	
0380	(Other administrative expenses)	
0385	(Cash contributions to resolution funds and deposit guarantee schemes)	
0390	(Depreciation)	
0400	(Property, Plant and Equipment)	
0410	(Investment Properties)	-8
0421	(Intangible assets)	
...	...	
0520	(Impairment or (-) reversal of impairment on non-financial assets)	
0530	(Property, plant and equipment)	
0540	(Investment properties)	-10
0550	(Goodwill)	
0561	(Intangible assets)	

16.7 Impairment on non-financial assets		Current period				Accumulated impairment
		Additions		Reversals		
		Operating	Investing	Operating	Investing	
		Annex V.Part 2.206		Annex V.Part 2.206		
		0010	0015	0020	0025	0040
0100	Impairment or (-) reversal of impairment on non-financial assets					
0110	Property, plant and equipment					
0120	Investment properties	-10				-10
0130	Goodwill					
0140	Intangible assets					
0145	Other					
0150	TOTAL					

45.2 Gains or losses on derecognition of non-financial assets

		Current period	
		Annex V.Part 2.313	
		Operating	Investing
		0010	0020
0005	Investments in subsidiaries, joint ventures and associates		
0010	Property, Plant and Equipment		
0020	Investment property	30	
0030	Intangible assets		
0040	Other assets		
0050	TOTAL	30	

Depreciation on investment properties assessed as institution's main business activities is already reported in the item 'Depreciation- investment properties' (row 0410) of template F 02.00. Therefore, it shall not be included in the item (row 0350) 'Other operating expense' of template F 02.00 and they shall not be reported in template F 45.03.

3.3. Feedback on the public consultation

The EBA publicly consulted on the draft proposal contained in this paper.

The consultation period lasted for one month and ended on 10 May 2026. Sixteen responses were received, of which six were published on the EBA website.

This paper presents a summary of the key points and other comments arising from the consultation, the analysis and discussion triggered by these comments and the actions taken to address them if deemed necessary.

In many cases, several industry bodies made similar comments or the same body repeated its comments in the response to different questions. In such cases, the comments and EBA analysis are included in the section of this paper where EBA considers them most appropriate.

Changes to the draft ITS have been incorporated as a result of the responses received during the public consultation.

3.3.1 Summary of key issues and the EBA's response

In the feedback received during the consultation on the draft amendments to the FINREP templates mainly affected by IFRS 18, respondents broadly supported the proposals. They generally acknowledged that the proposed reshaping of the Statement of profit or loss (F 02.00) based on a retail and investment bank as benchmark is a pragmatic way to implement the new accounting standard, while ensuring a standardised presentation and preserving, to the extent possible, the current level of information reported in FINREP. At the same time, some concerns were raised, primarily related to possible different business models. Specifically, institutions whose business models differ from those of a retail and investment bank will make greater use of residual items in template F 02.00. This approach would not be aligned with how management evaluates its main business activities.

Furthermore, regarding the income and expenses on investment properties and on other non-financial assets, respondents highlighted that the movement of the corresponding rows within the 'Investing' category of the Statement of profit or loss is a prescriptive rule-based 'one-size-fits-all' approach that may override IFRS 18. They mentioned the cases of collaterals obtained by taking possession that are part of the institution's credit recovery processes and of branches/own-use premises held pending disposals that are part of the institution's management of its branch network. In such circumstances, the related income and expenses should continue to be reported within the 'operating category' with a sufficient level of details.

Similar considerations were also raised for the classification of income and expenses on investments in subsidiaries, joint ventures and associates, accounted for using methods other than the equity method. Indeed, where these investments qualify as institution's main business activities, their representation in the residual items of 'Other operating income/expenses' would reduce transparency and makes it more difficult for users to identify and analyse the contribution of these activities to operating performance.

Respondents generally supported the inclusion of a residual item on income and expenses on financial assets within the investing category of the Statement of profit or loss, but they request clearer guidance.

With respect to the templates F 16 and F 45, respondents generally recognised that the addition of the three columns (operating, investing, and financing) aims at preserving the current level of information regardless of the institutions' assessment of main business activities. However, they claimed for clearer instructions, reconciliation with template F 02.00 and examples to avoid any inconsistent reporting.

In response to these comments, the EBA reviewed its initial proposals with the aim of reducing the use of residual items in the Statement of profit or loss (F 02.00) and, at the same time, facilitating the reconciliation between the Statement of profit or loss and the templates F 16 and F 45.

To this end, the current level of information on income and expenses on investment properties, investments in subsidiaries, joint ventures and associates and other non-financial assets has been kept with the 'operating category'. This approach is consistent with the expectation that most of the institution's income and expenses will continue to be reported within 'operating profit or loss'. On the other hand, the EBA has introduced adjustments to the 'Investing' category of the Statement of profit or loss. The related items refer to income or expenses on investing financial and non-financial assets when the latter are not part of the institution's main business activities in accordance with IFRS 18.

In templates F 16 and F 45, the EBA has retained the proposal of a breakdown by operating, investing and financing to preserve the current level of information regardless of the institution's business models. However, some cells under the columns of investing and financing categories have been greyed out in accordance with the IFRS 18 rules and the FINREP instructions. This allows harmonised reporting across institutions, in line with the expectation that most of income and expenses will continue to be reported in the operating category.

3.3.2 Summary of responses to the consultation and the EBA’s analysis

Comments	Summary of responses received	EBA analysis	Amendments to the proposals
General comments			
Timeline	<p>Some respondents highlight the importance of the implementation timeline, as many institutions are well advanced with their IFRS 18 formats. In some cases, institutions have already shared their approaches with auditors. If FINREP requirements ultimately diverge from those IFRS 18 formats, institutions may face unnecessary rework, operational complexity and a risk of inconsistent external reporting.</p> <p>The final FINREP templates and the related full technical package should be published well in advance – ideally by 1 July 2026 – to allow sufficient time for implementation and testing. Delays beyond 30 September 2026 would materially increase operational and reporting risk. It is also asked to clarify how to proceed for reporting on 31 March 2027 and 30 June 2027.</p>	<p>The EBA opinion will clarify the details of the reporting during the interim period from the first application of the IFRS 18 until the ITS apply.</p>	<p>Please refer to the EBA opinion</p>
Simplification versus net reporting impact	<p>One respondent highlights that despite the stated aim of simplifying supervisory reporting, some proposed FINREP changes would</p>	<p>The integration of the stress test data points and the simplification proposals in FINREP are out of</p>	<p>No amendments</p>

increase reporting obligations through additional data points and more frequent submissions. Notably, the integration of stress test data needs in FINREP would create a significant operational burden due to their granularity and limited availability in existing accounting systems. Therefore, EBA should clarify the purpose and supervisory use of these data points and, if retained, the reporting should be required annually rather than quarterly.

Furthermore, while the removal of duplicative templates is welcome (e.g. template F 06.00 which is deleted but for which the same data continues to be reported in the ESG supervisory reporting), simplification should be assessed through the overall impact on institutions' reporting scope and operational burden. Therefore, it would be useful if the EBA could publish a summary of such items to facilitate a more efficient review and assessment process across impacted institutions.

the scope of the EBA opinion on IFRS 18 implementation.

These comments will be addressed together with the rest of the reporting package when the public consultation ends (10 July 2026).

Non-calendar year end institutions	Further guidance or transitional arrangements are asked for non-calendar-year-end institutions to ensure that FINREP reporting continues to reflect the accounting framework applied in their public financial statements	The instructions will specify the reporting treatment for institutions which have a financial year different from the calendar year. Specifically, non-calendar-year institutions will be able to continue reporting the same data	Please refer to Annex V. Part 1.49
------------------------------------	---	---	------------------------------------

during the transition period. For example, institutions with a 31 March year-end only apply IFRS 18 to their public financial statements from the year ending 31 March 2028. This would create a situation in which FINREP is prepared on an IFRS 18 basis, while financial statements remain under IAS 1 for the financial year ending 31 March 2027, leading to a temporary misalignment between supervisory reporting and audited financial statements, effectively resulting in a form of dual reporting.

points as today under the new formats of the templates. They will report the information in accordance with their applicable accounting framework in the rows and columns of operating category. The distinction between operating, investing and financing will not be applicable to them.

Responses to questions in Consultation Paper EBA/CP/2026/07 Module 2 (IFRS 18 implementation in FINREP)

Question 1. Do respondents agree with the proposed classification of income and expenses in template F 02.00? If not, which alternative classification would you suggest?

Assessment of main business activities

Respondents generally acknowledge that the proposed reshaping of the template F 02.00 ‘Statement of profit or loss’ based on a retail and investment bank benchmark is a pragmatic way to implement IFRS 18, while ensuring a standardised presentation and preserving, to the extent possible, the information currently reported in FINREP. However, for institutions whose business models differ from the benchmark, this may result in a greater use of residual rows in template F 02.00. While no alternative classification is proposed, additional guidance or examples covering such

IFRS 18 is based on an assessment of main business activities to classify the income and expenses into the three new categories of operating, investing and financing of the Statement of profit or loss.

While the new accounting standard has the aim of enhancing the comparability among public financial statements of entities with similar business models, it makes the standardisation of the reporting template F 02.00 more difficult because same types of income or expenses could be classified in different categories in

Review of the rows under the operating and investing categories of template F 02.00 and related instructions. Some examples on how reporting are provided in the final report.

business models would support consistent application and facilitate supervisory interpretation.

Other respondents believe that the template F 02.00 should enable institutions to communicate a decision useful disaggregation consistent with IFRS 18, rather than steering outcomes towards a predefined structure that may not align with how management evaluates its main business activities.

accordance with the business models of the institutions.

With the aim of ensuring a standardised presentation and keeping, to the extent possible, the current level of information for supervisory reporting purposes, the template F 02.00 has been reviewed by considering a retail and investment bank as benchmark. Indeed, it is expected that the business profile of a retail and investment bank should cover most of the FINREP reporting population.

However, as correctly pointed out by respondents, this standardisation implies a greater use of residual rows in template F 02.00 whenever the business model of the institution differs from the benchmark of a retail and investment bank.

In order to reduce the use of these residual rows and to facilitate the reconciliation with the amounts reported in the templates F 16 and F 45, the rows under the operating and investing categories of template F 02.00 are now reviewed. Additional guidance is provided in the instructions and examples in the final report.

Retail banks	There was a request to clarify which types of income and expenses from own investments in	The business profile of a retail and investment bank should cover the most part of FINREP	Review of the rows under the
--------------	---	---	------------------------------

financial assets should be reported in investing versus operating category for ‘retail banks’ and how consistent application across banks with different business profiles should be ensured.

reporting population. For this reason, it is used as benchmark to standardise the reporting template F 02.00 and the institutions are expected to report most of their income and expenses in the operating category of template F 02.00.

operating and investing categories of template F 02.00 and related instructions

However, in light of the comments received, the rows under the investing category of template F 02.00 are reviewed to allow a more disaggregated representation in case of any institution whose business model differs from that of a retail and investment bank used as a benchmark. This disaggregation aims at facilitating the reconciliation with templates F 16 and F 45.

Income and expenses on investment properties and other non-financial assets

Most respondents claim that the current proposal where the income and expenses from investment properties and other non-financial assets are classified in the ‘investing’ category is a prescriptive rule-based ‘one-size-fits-all’ approach that, in essence, overrides IFRS 18. In practice, banks commonly hold non-financial assets that arise as a direct consequence of core operating activities – such as repossessed assets (collateral obtained by taking possession) and closed branches/own-used premises held pending disposal. These assets result from credit intermediation/recovery

The existing line items of income and expenses from investment properties and other non-financial assets are now kept within the Operating category, for both IFRS institutions and NGAAP institutions, to allow a disaggregated representation.

For IFRS institutions and NGAAP compatible with IFRS, these line items shall be used when investment properties and other non-financial assets are assessed as part of the institution's main business activities, in accordance with IFRS 18. Otherwise, the rows ‘Impairment or (-) reversal of impairment on investing non-

The existing line items of income and expenses on investment properties and other non-financial assets under the operating category are kept for both IFRS and NGAAP institutions.

processes and the management of the branch network. Accordingly, the final instructions should explicitly allow institutions to present the related income and expenses within the operating category in a way that best provides a useful structured summary of performance. Specifically, a disaggregated representation of these income and expenses in the operating category (e.g. depreciation, impairment/reversal, gains/losses on disposal) should be allowed where this provides better transparency and avoids mixing heterogeneous impacts within broad residual lines.

financial assets’, ‘Gains or (-) losses on derecognition of investing non-financial assets, net’ and ‘Other income or (-) expenses on investing non-financial assets’ within the investing category of template F 02.00 shall be used to report these income and expenses from investment property and other non-financial assets.

A more disaggregated representation of these income and expenses from investing non-financial assets is provided in the corresponding templates F 16.07, F 45.02 and F 45.03.

For non-calendar-year-end IFRS institutions and NGAAP institutions based on BAD, only the line items under the operating category shall be used. No distinction between operating and investing categories is applicable to them.

For institutions applying IFRS, the instructions specify under which circumstances these line items shall be used instead of using the corresponding line items under the investing category.

Impairment on other non-financial assets

There was a request to move the row 0570 relating to the impairment or reversals of other non-financial assets (i.e. excluding operating fixed assets) within the ‘Impairment losses or (-) reversals of impairment losses on non-financial assets’ (row 0520) of template F 02.00 under the ‘investing’ category, or if the row is kept under the ‘operating’ category to explain its intended scope.

As explained above, the existing line items of income and expenses from investment properties and other non-financial assets are now kept within the operating category, for both IFRS institutions and NGAAP institutions in order to allow a disaggregated representation.

For IFRS institutions and NGAAP compatible with IFRS, the instructions specify under which circumstances the operating line items shall be used instead of using the new row ‘Impairment

Please refer to the EBA analysis column.

or (-) reversal of impairment on investing non-financial assets' under the investing category of template F 02.00.

Income and expenses from investment in subsidiaries, joint ventures and associates

Most respondents express concerns on the proposed classification of income and expenses from investments in subsidiaries, joint ventures and associates (other than those accounted for using the equity method), as well as from investment property, where these activities qualify as main business activities in accordance with IFRS 18.58. Indeed, under the consultation proposal, these amounts are grouped into the line item 'Other operating income' and 'Other operating expenses'. This reduces transparency and makes it more difficult for users to identify and analyse the contribution of these activities to operating performance. In addition, a conceptual and practical inconsistency between the reporting of these items in 'Other operating income/expenses' of template F 02.00 and its breakdown in Template F 45.2 'Gains or losses on derecognition of non-financial assets', Template F 16.7 'Impairment on non-financial assets' and in Template F 45.03 'Other income and expenses' is detected.

In light of the above, they ask the EBA to reconsider the deletion of the existing FINREP

The existing line items of income and expenses from investments in subsidiaries, joint ventures and associates are now kept within the operating category, for both IFRS institutions and NGAAP institutions.

For IFRS institutions and NGAAP institutions compatible with IFRS, these line items shall be used when investments in subsidiaries, joint ventures and associates are assessed as part of the institution's main business activities in accordance with IFRS 18. Otherwise, the rows 'Impairment or (-) reversal of impairment on investing non-financial assets', 'Gains or (-) losses on derecognition of investing non-financial assets, net' and 'Other income or (-) expenses on investing non-financial assets' under the investing category shall be used to report these income and expenses from investments in subsidiaries, joint ventures and associates.

A more disaggregated representation of these income and expenses from investing non-financial assets is provided in the templates F 16.07, F 45.02 and F 45.03.

The existing line items of income and expenses from investments in subsidiaries, joint ventures and associates under the operating category are kept for both IFRS and NGAAP institutions.

For institutions applying IFRS, the instructions specify under which circumstances these line items shall be used instead of using the corresponding line items under the investing category.

lines for income and expenses from investments in subsidiaries, joint ventures, associates and investment property in Template F 02.00. and retaining dedicated lines for gains/losses on derecognition, dividend income and impairment related to these assets within the operating section of Template F 02.00, to be used whenever these activities constitute main business activities in accordance with IFRS 18.58.

For non-calendar year end IFRS institutions and NGAAP institutions based on BAD, only the line items within the operating category shall be used. No distinction between operating and investing categories is applicable to them.

Foreign exchange differences	Some respondents recommend revising the Annex V instructions of ‘Exchange differences [gain or loss], net’ so it aligns more clearly with IFRS 18. They state that IFRS 18 requires foreign exchange differences recognised in profit or loss to be classified in the same category as the underlying income and expenses—operating, investing, or financing—unless doing so would involve undue cost or effort. Therefore, they suggest that the FINREP instructions should not be limited to operating items but should also allow for reporting exchange differences related to investing and financing items where separate classification would not be unduly burdensome.	The row ‘Exchange differences [gain or loss], net’ is kept within the operating category of the template F 02.00 since it is expected that it mostly refers to operating income and expenses. The instructions will specify that when the foreign exchange differences refer to investing or financing income and expenses, they shall be reported in the residual row of other income or (-) expenses on investing assets within the investing category, or in the row ‘Income or (-) expenses on non-operating liabilities’ of the financing category. A detail of these foreign exchange differences under the investing category is provided in template F 45.03 ‘Other income and expenses’.	Please refer to the EBA analysis column.
Income and expenses on assets and disposal group classified as held for sale	There was a request to clarify where the income and expenses on a disposal group classified as held for sale shall be presented in	Two line items for ‘Profit or (-) loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued	The following two rows are added: ‘Profit or (-) loss

template F 02.00, given that as per IFRS 5, when a disposal group is classified as held for sale, its income and expenses continue being recognised in profit or loss as before until the disposal, but they are not separately presented by nature or function in the Statement of profit or loss. Instead, their presentation depends on whether the disposal group qualifies as a discontinued operation.

Furthermore, IFRS 18 states that income and expenses arising on the derecognition of an asset, or its classification as held for sale (and subsequent measurement while held for sale), shall be classified in the same category as the income and expenses from that asset immediately before this classification. In template F 02.00, this line item appears only within the investing category.

Template F 02.00 should allow profit or loss on 'Non-current assets and disposal groups classified as held for sale' to be reported within operating or investing, rather than being restricted to investing only. Indeed, items such as 'Investment properties and other non-financial assets' and 'Investments in subsidiaries, associates and joint ventures' may be appropriately presented within operating or investing depending on the institution's

operations' are now provided within both the operating and the investing categories to allow to keep the same classification of these income and expenses immediately before the classification as held for sale, in accordance with IFRS 18.

Regarding the interest income and interest expenses from 'non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations', they will continue to be reported separately from profit or loss, in the rows of interest income and expenses, in line with the current reporting framework, but introducing a distinction between operating and investing classification (rows 0081 and 0141 within the operating category, and rows 0592 and 0593 within the investing category respectively).

from operating non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations' and 'Profit or (-) loss from investing non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations. The instructions specify under which circumstances these rows shall be used and the reporting of the interest income and expenses on these assets and group for disposal.

business model and management view. On the other hand, for property, plant and equipment and for intangible assets, the classification should always be within the operating category.

Net intermediate income	<p>There was a request to keep the current wording ‘Total operating income, net’, which is commonly used in finance industry, instead of replacing it with the term ‘Net intermediate income’ to avoid any confusion. Indeed, IFRS 18 does not define this subtotal.</p>	<p>The term ‘Net intermediate income’ was initially proposed to distinguish this subtotal from the IFRS 18 mandatory subtotal of ‘operating profit or loss’.</p> <p>In light of the comment received, the current wording ‘Total operating income, net’ is now kept.</p>	<p>Please refer to the EBA analysis column.</p>
Provisions	<p>There was a request to remove the newly introduced rows 0445 (Pending legal issues and tax litigation) and 0446 (Restructuring, pensions and other employee benefits) since they would increase complexity on institutions’ accounting processes and financial statement preparation rather than reduce it and without providing incremental supervisory value that would justify this additional complexity.</p>	<p>The proposed new line items rows 0445 (Pending legal issues and tax litigation) and 0446 (Restructuring, pensions and other employee benefits) are not related to the IFRS 18 implementation but they are part of the simplification package. Specifically, they are linked to the proposed deletion of template F 43. Therefore, they won’t be implemented under the EBA opinion on IFRS 18 implementation, but they will be assessed with the rest of the reporting package when the public consultation ends (10 July 2026).</p>	<p>Exclusion of the rows 0445 (Pending legal issues and tax litigation) and 0446 (Restructuring, pensions and other employee benefits) from the EBA opinion on the IFRS 18 implementation</p>

Question 2. Do respondents agree with the proposed FINREP inclusion of the row 0599 ‘Income or (-) expenses on investing financial assets and on any related financial instruments’ to handle any situation where an institution provides financing to customers as main business activities, but not investing in financial assets? If not, please provide the rationale backing your view.

Guidance on income or (-) expenses on investing financial assets and on any related financial instruments

Respondents generally support the inclusion of row 0599 as a useful residual line item for cases where ‘investing in financial assets’ is not assessed as a main business activity, in accordance with IFRS 18.

They agree in general on providing residual line items within broader reporting categories to help institutions allocate income and expenses that belong to a given category but do not fit into more specifically defined line items. Some respondents do not foresee however to use this residual line item.

Other respondents ask for clearer guidance in the final instructions. In particular, they ask for confirmation that row 0599 can be also used under other circumstances, including when specific assets or portfolios are not related to the institution’s main business activities by applying IFRS 18 facts-and-circumstances assessment. They further notice that if many items are reported there, institutions should provide a more granular breakdown (e.g. interest income, dividend income, impairment gains or losses, gains or losses on

The proposed line item 0599 under public consultation is now reviewed to allow a more disaggregated representation of the ‘income or (-) expenses on investing financial assets and on any related financial instruments’ and to facilitate the reconciliation with templates F 16 and F 45.

As explained under Q1, the FINREP Statement of profit or loss is harmonised by considering the business profile of a retail and investment bank as benchmark. Indeed, the business profile of a retail and investment bank should cover most of the FINREP institutions. Therefore, most of the income and expenses are expected to be reported in the operating category of template F 02.00.

However, the new line items under the investing category (interest income/expenses; gains or losses on investing financial assets; gains or losses from hedge accounting, impairment or reversal, and other income and expenses) will cover any cases where the business models of the institution deviates from the retail and investment bank benchmark, like institutions

Review of the rows under the operating and investing categories of template F 02.00 and related instructions. Examples are provided in the final report.

derecognition, hedging results related to the securities portfolio, etc.) to ensure consistent reporting and to facilitate reconciliation with templates F 16.00.

On the other hand, some respondents express doubt on the usefulness of this row because they have general reservations on the proposed prescriptive structure of the Statement of Profit or Loss.

providing only finance to customers or investing exclusively in specific classes of financial assets as main business activities in accordance with IFRS 18. Some examples are provided in the Final report.

Question 3. Do respondents agree with the introduction of a breakdown by category of income and expenses (operating, investing and financing) in templates F 16 and F 45? If not, which alternative representation would you suggest?

F 16 and F 45: breakdown by operating, investing, financing category

Most respondents support in principle the proposed operating/investing/financing breakdown in F16 and F45, as it can preserve today’s granularity while accommodating IFRS 18 presentation differences across institutions’ business models. However, they ask for clearer instructions, mapping rules with template F 02.00 and examples to avoid any inconsistent reporting and double counting.

On the other hand, other respondents argue that FINREP breakdowns should be strictly based on the accounting principles applied by institutions and they should be limited to the disclosures explicitly required by IFRS. The proposed detailed breakdowns may be disproportionate. It may entail complexity,

The proposed operating/investing/financing breakdown in templates F 16 and F 45 is kept since it allows to preserve the current granularity of information, regardless of the institutions’ business models.

The proposal is however reviewed to consider that most income and expenses should be reported under the operating category in accordance with IFRS 18. For this reason, some cells under investing/financing columns are now greyed out. Furthermore, the reconciliation with the amounts of template F 02.00 is now easier by the inclusion of a few rows in templates F 45.02 and F 45.03, the review of the references, as well as the review of the line items of the template F 02.00.

Some cells under the investing/financing columns of templates F 16 and F 45 are greyed out and some rows are added in templates F 45.02 and F 45.03 to facilitate the reconciliation with template F 02.00.

reconciliation difficulties and operational burdens since most banks' income and expenses would naturally fall under operating category, while investing and especially financing would often contain little or no meaningful data. Alternatively, one respondent suggested adding a separate dedicated template only for the new residual items.

F 16.04.1: gains or losses on equity instruments mandatorily at fair value through profit or loss by instrument

Some respondents claim that row 0287 'Gains or (-) losses on non-trading financial assets mandatorily at fair value through profit or loss, net' within the 'operating' section of F02.00 does not include any reference to template F 16.04.1, while the proposed row 0599 'Income or (-) expenses on investing financial assets and on any related financial instruments' within the 'investing' section of F02.00 includes such a reference. This seems to imply that equity instruments mandatorily at fair value through profit or loss should be only reported in the investing category, while row 0020 'Equity Instruments' of template F 16.04.1 'Gains or losses or non-trading financial assets mandatorily at fair value through profit or loss by instrument' seems to allow any such amounts to be assigned to either the 'operating' or the 'investing' column.

In template F 16.04.1 'Gains or losses or non-trading financial assets mandatorily at fair value through profit or loss by instrument', row 0020 'Equity Instruments' can be reported either under the 'operating' or the 'investing' column in accordance with the institution's assessment of its main business activities following IFRS 18.

The proposed row 0599 'Income or (-) expenses on investing financial assets and on any related financial instruments' within the 'investing' section of F 02.00 is now reviewed in a more disaggregated way (interest income/expense; gains or losses on investing financial assets; gains or losses from hedge accounting and other income or expenses) in order to avoid bundling items with different natures and facilitating the reconciliation with templates F 16 and F 45.

Nevertheless, the expectation is that these rows of the investing section will be rarely used as

In row 287 of F 02.00, a reference to template F 16 is added.

most of the income and expenses of reporting institutions will continue being reported under the operating section of template F 02.00, in accordance with IFRS 18.

In row 287 of F 02.00, a reference to template F 16 is added.

F 16 and F 45: income and expenses on investment properties and other non-financial assets

Some respondents notice ambiguities and potential inconsistencies in how various income and expenses on investment properties and on other non-financial assets (depreciation, impairment, and gains/losses on derecognition) should be reported across the FINREP templates F 02.00, F 16.07, F 45.02, and F 45.03. Specifically, templates F 16.07, F 45.02 and F 45.03 seem to allow such items to be classified as either operating or investing, while template F 02.00 seems to force them into the investing category, unless these investments are assessed as ‘main business activities’ in accordance with IFRS 18. In the latter case, the corresponding income and expenses are bundled and reported in the rows of ‘Other operating income/expenses’ of template F 02.00. However, it is not clear if these amounts should be reported in F 45.03, in F 45.02 or in both templates.

Furthermore, row 0020 ‘Investment property’ of template F 45.03 includes a reference to IAS

As explained under Q1, the existing line items of income and expenses on investment properties and other non-financial assets of template F 02.00 are now kept under the operating category, for both IFRS institutions and NGAAP institutions, to allow a disaggregated representation when these investments are assessed as institutions’ main business activities’ in accordance with IFRS 18.

The rows of ‘Other operating income/expenses’ of template F 02.00 shall not be used for these amounts.

On the other hand, when these investments are not considered as main business activities, the operating category cannot be used. Therefore, they will be reported in the relevant rows of the investing category of template F 02.00 in a more aggregated way.

Rows and references of templates F 45 are adjusted to facilitate the reconciliation with the amounts reported in template F 02.00.

Please refer to the EBA analysis column.

40.75(f) which only covers direct operating expenses from investment properties. As a consequence, this row seems to exclude any other type of income or expenses on investment properties (e.g. depreciation, impairment, gains/losses on derecognition).

F 16 and F 45: income and expenses on investment in subsidiaries, joint ventures and associates (other than those accounted for using the equity method)

Some respondents detect inconsistencies across templates F16.07, F02.00, and F45.03 in how impairment/reversal amounts and gains/losses on derecognition of subsidiaries, joint ventures, and associates (other than those accounted for using the equity method) should be reported. In particular, template F 16.07 seems to allow flexibility in the classification of impairment or reversal amounts between operating and investing categories, while template F 02.00 seems to force their classification in the 'investing category', unless these investments are assessed as 'main business activities' in accordance with IFRS 18. In the latter case, the related income and expenses are bundled and reported in the rows 0340/0350 ('Other operating income/expense'). However, it is not clear where these amounts should be reported in template F45.03. Indeed, the latter appears not to contain any suitable row for these items when treated as operating. The same issue

As explained under Q1, the existing rows of income and expenses on investments in subsidiaries, joint ventures and associates of template F 02.00 are now kept under the operating category, for both IFRS institutions and NGAAP institutions, to allow a disaggregated representation of these amounts when the related investments are considered as institutions' main business activities', in accordance with IFRS 18.

The rows of 'Other operating income/expenses' of template F 02.00 shall not be used for these amounts.

On the other hand, when these investments are not considered as main business activities, the operating category cannot be used. Therefore, they will be reported in the relevant rows of the investing category of template F 02.00 in a more aggregated way.

Please refer to the EBA analysis column.

occurs for ‘Gains or (-) losses on derecognition of investments in subsidiaries, joint ventures and associates, net’ when these amounts are considered as ‘operating’.

Rows and references of templates F 45 are adjusted to facilitate the reconciliation with the amounts reported in template F 02.00.

Derecognition of non-financial assets: F 45.02

Some respondents state that template F 45.02 needs updating because its wording and related instructions do not reflect the revised F02.00-line structure. Clarifications on which column to use for reporting gains or losses on derecognition of property plant and equipment, intangibles, investment properties and other non-financial assets, and gains or losses on held-for-sale disposals are also required.

The labels, the references and the related instructions of templates F 45.02 and F 45.03 are now reviewed to clarify their contents and facilitating the reconciliation with template F 02.00.

Please refer to the EBA analysis column.

Stress test data: F 16.03

It is asked to remove the two new rows (0096 and 0097) of template F 16.03 relating to the reporting of stress test data from the ad-hoc data collection starting in March 2027. The integration of such data into FINREP generates significant operational complexity, both in terms of its calculation and its collection; the implementation time period would therefore be too short. Moreover, a quarterly reporting frequency for such data does not appear appropriate in view of the current stress test requirements and it is not consistent with the objective of simplification and cost reduction in reporting.

The proposed new line items rows 0096 and 0097 (‘Gains or losses on financial assets and liabilities held for trading, net – of which: Client revenues’ and – of which: Accrued interest from held-for-trading instruments recorded under the ‘dirty price’ approach) are not related to the IFRS 18 implementation, and they are part of the proposal of integration of stress test data needs in FINREP. Therefore, they will not be implemented under the EBA opinion on IFRS 18 implementation during the interim period. They will be assessed with the rest of the reporting package when the public consultation ends (10 July 2026).

Exclusion of the rows 0096 and 0097 from the EBA opinion on the IFRS 18 implementation during the interim period

Question 4. Is there any additional change introduced by IFRS 18 that needs to be reflected in FINREP templates to convey to supervisors an appropriate level of financial information on your institution?

<p>Assessment of main business activities</p>	<p>Some respondents ask for incorporating key clarifications currently set out in the Consultation paper into the instructions. Notably, the latter should include the expectation that reporting institutions not investing in financial assets as main business activity are ‘rare cases’. Furthermore, the instructions should include the expectation that for most reporting institutions, income and expenses related to hybrid instruments, derivatives, foreign exchange differences, derecognition and changes in classification are predominantly related to operating activities, while maintaining the principle that their classification should follow the nature of the underlying items.</p> <p>It is also asked for clearer guidance on how applying the benchmark model, especially for reporting institutions whose activities are mainly service- or infrastructure-based.</p>	<p>The instructions will clarify that the ‘retail and investment bank’ is considered as benchmark for the classification of income and expenses in template F 02.00, accordingly most income and expenses are expected to be reported in the operating category of the Statement of profit or loss.</p> <p>Notwithstanding, new and more aggregated line items (in comparison to the ones under the operating category) are provided for the investing category of the template F 02.00 to address any possible deviation from the benchmark model of ‘retail and investment bank’. In templates F 16 and F 45, the operating/investing/financing breakdown will allow to keep the current level of granularity of information, regardless of the institutions’ business models. Some examples on how reporting in case of different business models will be provided in the final report.</p>	<p>Please refer to the EBA analysis column.</p>
<p>Inconsistencies and typos</p>	<p>Some inconsistencies in IFRS 18 references across all proposed FINREP amendments and typos are detected. In particular, row 0192 appears to remain in the clean version of the</p>	<p>The templates, the references and related instructions are reviewed to amend any typos.</p>	<p>Please refer to the EBA analysis column.</p>

template F 02.00, even though it is understood to be deleted for IFRS purposes; rows 0591 to 0599 of template F 02.00 lack references despite the new and revised instructions; in template F 20.03, rows 0200 and 0230 should be marked as deleted but they are not.

Template F 22.01	It is proposed to include the proposed new version of template F 22.01 on fee and commission income and expenses in the set of the templates for early adoption from the first quarter 2027 although it is not impacted by IFRS 18.	The proposed changes to template F 22.01 are not linked to the IFRS 18 implementation, and they are part of the simplification proposals that are under public consultation until 10 July 2026. Therefore, the template F 22.01 cannot be now included in the EBA opinion on the implementation of IFRS 18 during the interim period.	Template F 22.01 is out of the scope of the EBA opinion on IFRS 18 implementation during the interim period
Application to NGAAP reporters	There was a request to clarify how the proposals apply to NGAAP reporters.	<p>The proposed amendments to templates F 02.00, F 20.03, F 16 and F 45 are applicable to IFRS institutions and those NGAAP reporters which apply IFRS-based national accounting standards. NGAAP reporters based on the Banking Accounting Directive and not compatible with IFRS will continue reporting the same data as today by using the new format of the template F 02.00. The instructions and the reference column of template F 02.00 specify which line items are applicable to them.</p> <p>In templates F 16 and F 45, NGAAP reporters not compatible with IFRS will report the amount by using only the column of operating category.</p>	Please refer to the EBA analysis column.

Similarly, IFRS institutions with a financial year-end different from the calendar year-end will continue reporting the amounts in templates F 02.00, F 20.03, F 16 and F 45 by using the existing line items and only the 'operating' column of templates F 16 and F 45 until IFRS 18 applies to them.
