EBA Regular Use

European Banking Authority

Pillar 3 Data Hub for SNCIs

Discussion Paper

EBA Staff | Reporting & Transparency Unit (DART)

Public Hearing | 01 July 2026

Agenda

1. Welcome and introduction

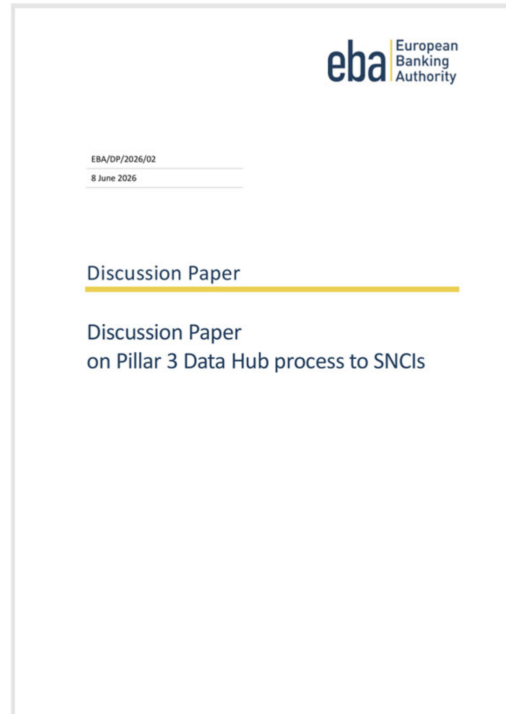
Objectives of the Public Hearing

- Introduce the Discussion Paper under consultation until **20 July** and main aspects on which feedback would be welcomed. Presentation of the planned next steps.

- The presented discussion paper already considers the feedback received from the industry during previous interactions, namely:
  - First discussion paper on P3DH published in December 2023 (link);
  - Bilateral meetings organised with Banking Associations;
  - Feedback received via different means during the implementation of the process to Large and Other institutions.

- Opportunity to discuss questions from participants and provide clarifications needed to respond to the consultation.

- Collection of early feedback to be considered when finalising the P3DH process to SNCIs. To note, the public hearing does not replace written responses to the Discussion Paper.


EBA/DP/2026/02
8 June 2026

Discussion Paper

Discussion Paper
on Pillar 3 Data Hub process to SNCIs

2. Background

- CRR3 introduced new provisions on the means of disclosures aiming at enhancing market discipline by centralising disclosures of prudential information in a single access point established by EBA;
- This facilitates access to prudential data and comparability across industry;
- Pillar 3 Data Hub for large and other institutions went live 26 January 2026. CRR establishes different processes for the different types of institutions;
- For SNCIs, the EBA is required to publish the Pillar 3 disclosures on their behalf and based on the information reported by these institutions to competent authorities under supervisory reporting framework;
- A centralised process for the calculation and publication of Pillar 3 information intends to alleviate the operational costs currently borne by institutions in managing their own disclosure processes;
- Institutions no longer required to maintain individual disclosure channels.

3. Overview of key elements of SNCIs process [1]

EBA collects, via supervisory reporting, the **necessary data** to meet the P3DH mandate.
Data **submitted via supervisory reporting** is considered as validated by institutions to be used by the EBA in the calculations.

EBA **publishes the calculation formulas** and institutions submit feedback.
Precondition – Straightforward mapping, minimising risk of errors.

EBA performs the calculations and **publishes** results.
Same publication date to all institutions (depending on the type of institution).
Republication can be done when necessary (resubmission of supervisory reporting data) and if any issues are raised by institutions.

EBA helpdesk is created in case of any questions or corrections needed.

3. Overview of key elements of SNCIs process [2]

Calculation methodology

Presented in this DP for one template. Future developments to be consulted.

Please see **Section 4.3** of this DP.

Amendments to reporting framework

2027: Depending on the result of the public consultation.

Please see **Sections 4.2 and 4.4** of this DP.

Consultation Paper

Published in **April 2026**. To amend the supervisory reporting framework as needed for P3DH.

Please see **Section 4.2** of this DP.

First and second publications

Planned to **Q4 2026** and **April / September 2027.** Staggered approach to be followed.

Please see **Section 4.4** of this DP.

First steady-state publication

April, June and September 2028 with complete set of Pillar 3 requirements.

Please see **Section 4.4** of this DP.

3.1. Links with supervisory reporting consultation paper

Pillar 3 Template / Table	Institutions suject to requirement	Analysis' results	Proposal (Supervisory reporting ITS)
EU KM1: Key metrics template	All SNCIs	All datapoints available	-
EU OV1: Overview of total risk exposure amounts	Listed SNCIs only	A few datapoints missing	Two datapoints to be added in COREP (minimum necessary)
EU CR1: Performing and non-performing exposures and related provisions	Listed SNCIs only	One datapoint missing FINREP not available at individual level	Add Pillar 3 template to supervisory reporting ITS for solo institutions
EU CQ1: Credit quality of forborne exposures	Listed SNCIs only	FINREP not available at individual level	Add Pillar 3 template to supervisory reporting ITS for solo institutions
EU CQ3: Credit quality of performing and non-performing exposures by past due days	Listed SNCIs only	FINREP not available at individual level	Add Pillar 3 template to supervisory reporting ITS for solo institutions
EU CQ7: Collateral obtained by taking possession and execution processes	Listed SNCIs only	FINREP not available at individual level	Add Pillar 3 template to supervisory reporting ITS for solo institutions
EU CVA4: RWEA flow statements of credit valuation adjustment risk under the Standardised Approach	Listed SNCIs only	All datapoints available	-
EU REM1: Remuneration awarded for the financial year	Listed SNCIs only	Not all institutions under the scope of EBA Guidelines on remuneration	Add Pillar 3 template to supervisory reporting ITS for listed SNCIs
EU REM2: Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)	Listed SNCIs only	Not all institutions under the scope of EBA Guidelines on remuneration	Add Pillar 3 template to supervisory reporting ITS for listed SNCIs
EU REM3: Deferred remuneration	Listed SNCIs only	Not all institutions under the scope of EBA Guidelines on remuneration	Add Pillar 3 template to supervisory reporting ITS for listed SNCIs
EU REM4: Remuneration of 1 million EUR or more per year	Listed SNCIs only	Not all institutions under the scope of EBA Guidelines on remuneration	Add Pillar 3 template to supervisory reporting ITS for listed SNCIs

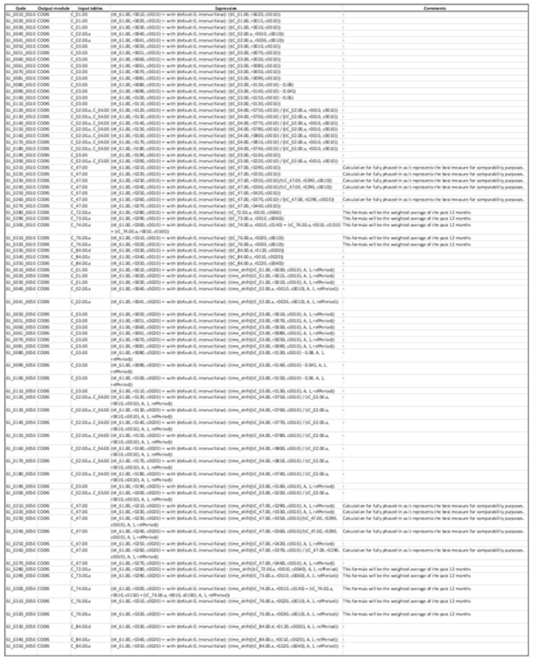
Pillar 3 Tables
EU OVC: ICAAP information
EU OVA: Institution risk management approach
EU LIQA: Liquidity risk management
EU CRA: General qualitative information about credit risk
EU MRA: Qualitative disclosure requirements related to market risk
EU ORA: Qualitative information on operational risk
EU REMA: Remuneration policy

Qualitative information:

- **Option A:** Take no action - SNCIs would need to continue disclosing this information as done under CRR2;
- **Option B:** Submission of a report in PDF format under the supervisory reporting framework;
- **Option C:** Use the DPM - The EBA would model the tables and the templates to allow the submission

3.2. Calculation methodology

Annex I – Formulas for calculation EU KM1[19]



- Formulas derived from the existing mapping tool available on the EBA website;
- Usage of the internal Data Point Model tool. Computation will be run with an internally developed calculation engine;
- Formulas to be implemented for the remaining templates would also be published for short consultation;
- Following a feedback period, the final version of the calculation methodology will be made available on the EBA website. This is to be done every time the need is identified (amendments to frameworks, correction of inaccuracies, etc.).

3.3. Proposed publication staggered approach [1]

Definition of a common publication date

Conclusion of audit procedures

The common date for publication shall take into account the **usual timeline** for the conclusion of audit procedures. Other legal deadlines shall also be considered (Transparency Directive).

This shall lead to **a limited number of resubmissions** after the Pillar 3 figures publication by the EBA.

Reporting timeline

Remittance dates for reporting need to be taken into account.

Resubmissions

Historical trends on resubmissions can give a good indication of “by when” the data can be considered **stable**.

3.3. Proposed publication staggered approach [2]

	First publication (reference Dec 2025)	Second publication (reference Dec 2026) Option A	Second publication (reference Dec 2026) Option B	Steady state (reference Dec 2027)
Non-listed SNCIs	**Q4 2026** All P3 requirements	**End-September 2027** All P3 requirements	**End-September 2027** All P3 requirements	**End-September 2028** All P3 requirements
Listed SNCIs	**Q4 2026** EU KM1	**End-April 2027** [1] EU KM1	**End-April 2027** [1] EU KM1, EU CVA4 for all listed SNCIs [2] EU CR1, EU CQ1, EU CQ3, EU CQ7 for listed SNCIs at consolidated level [2]	**End-April 2028** [1] All P3 requirements except REM information **End-June 2028** REM information

Note [1] A question is included in the discussion paper on whether there would be a preference for end-April, end-June or any other date. End-April would be fully aligned with the timeline under the Transparency Directive for the publication of financial statements.
Note [2] The supervisory reporting information to compute these Pillar 3 figures is already available but, as explained in the discussion paper, a staggered approach for publication is proposed to be followed.

Resubmission of supervisory reporting data: automatic recalculation. Identification of the respective date of republication in the generated XBRL.csv file.

4. Overview of the SNCIs overall process

1 Publication of calculation formulas

- Period for comments;
- To be published every time needed;
- Following the comments period, final version is published.

2 Identification of institutions

- Master data provided by Competent Authorities;
- Information to be kept up to date (centralised calculation for SNCIs and onboarding for large and other institutions).

3 Calculation and publication

- Calculation on an annual basis;
- Different publication dates as presented in the previous slide.

4 Helpdesk

- Helpdesk via email;
- Corrections to be done as needed.

5 Republication

- Automatic, with the submission of revised supervisory reporting data;
- Date of republication visible in the generated XBRL.csv file;
- All XBRL.csv are kept available.

5. Tentative timeline

Thank you!

EBA Regular Use

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