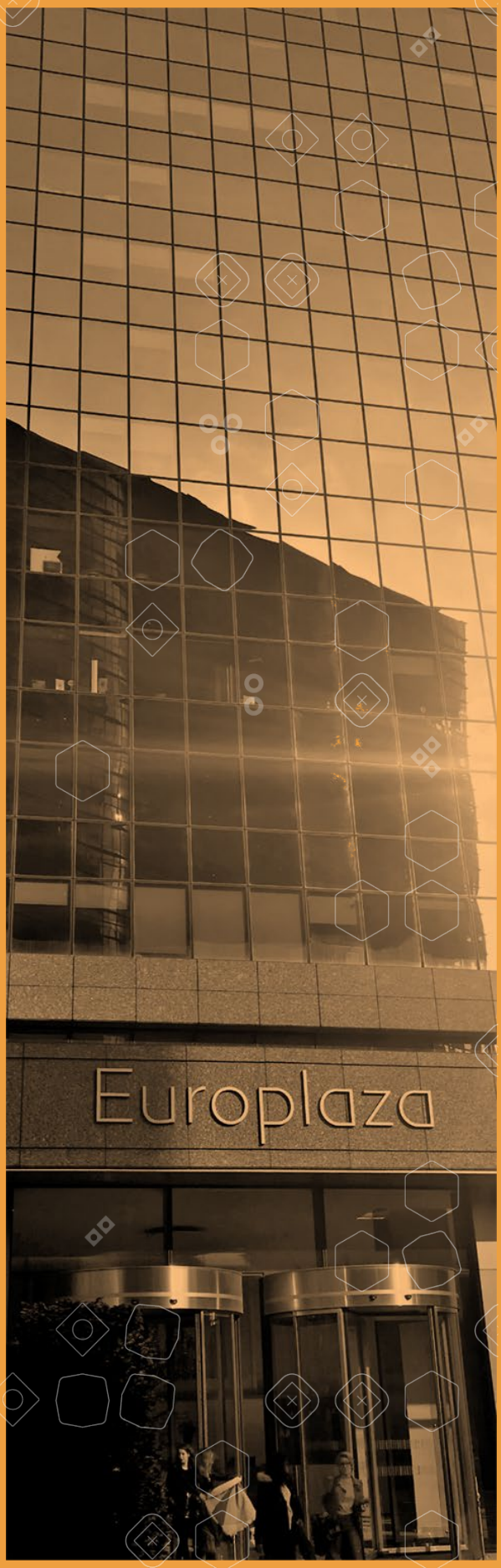
European Banking Authority

RISK ASSESSMENT QUESTIONNAIRE

Graphs / Autumn 2026



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Introduction

The EBA conducts semi-annual Risk Assessment Questionnaires (RAQs) among banks. This booklet presents a summary of the responses to the survey carried out in Autumn 2026, in which 85 banks[1] submitted their answers. Results of the survey were received in August and September 2026, are published together with the Autumn's 2026 EBA's Risk Assessment Report and are presented in an aggregate form. The findings of this questionnaire have served as an input to the RAR, where readers can find the EBA's narrative, analysis and interpretation of the survey results. The questionnaire is available in the Appendix. Where relevant, answers from former questionnaires may be presented. Responses that were not selected by any banks are not presented in the charts.

Should you wish to provide your feedback on this booklet, please do so by contacting rast@eba.europa.eu

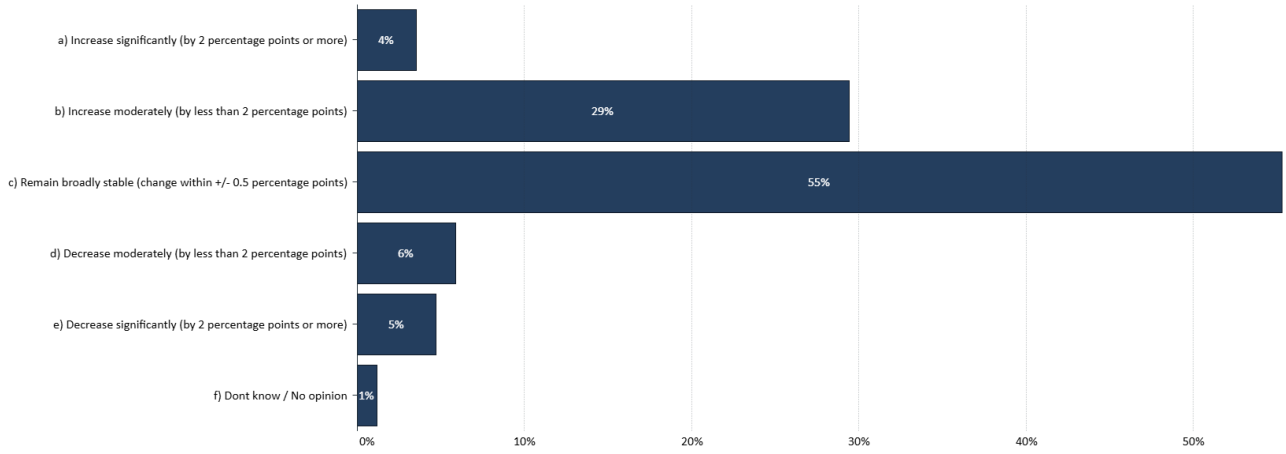
[1] A list of banks participating in the survey is published in the Annex.

Banks' questionnaire

1. Business model / strategy / profitability

Question 1: Autumn 2026 results

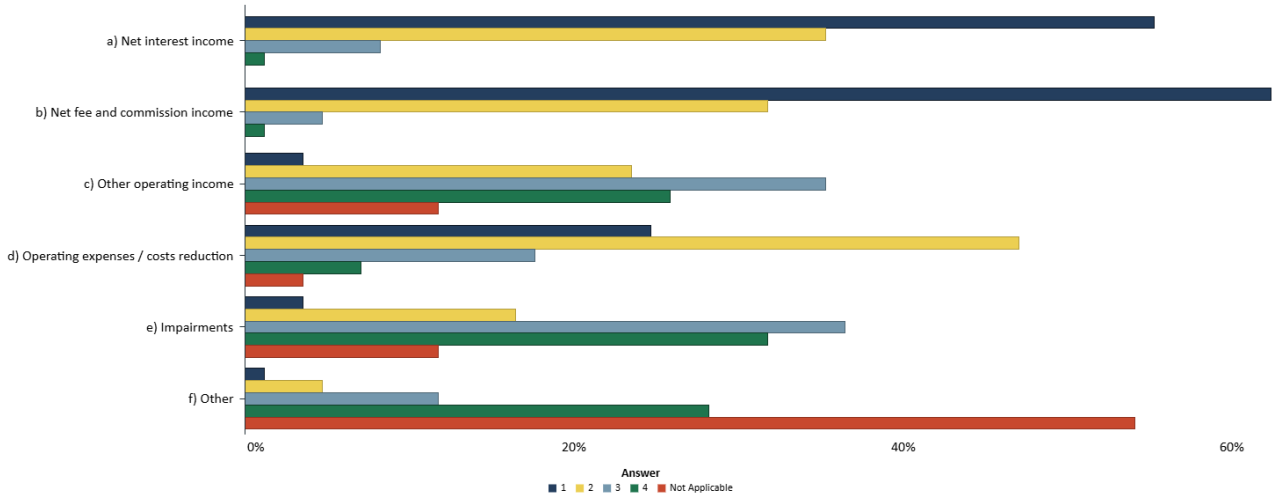
Q1 How do you expect your institution's return on equity (ROE*) to evolve over the next 6 to 12 months?[2]



[2] *The responses indicate banks' expectations vis-à-vis their current RoE*

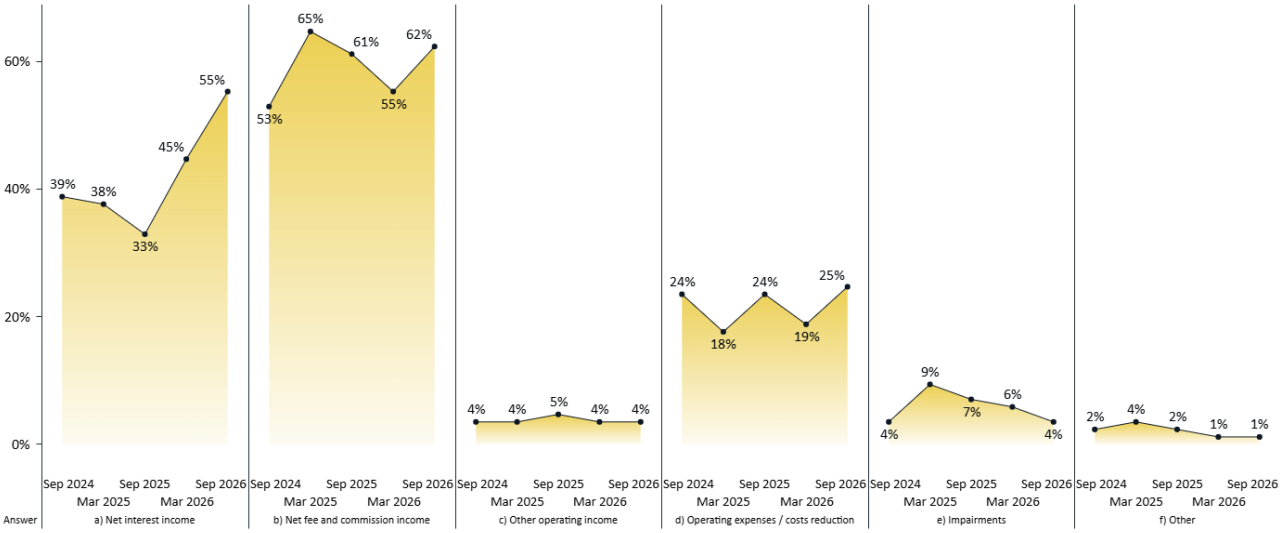
Question 2: Autumn 2026 results

Q2 Which areas are you primarily targeting to increase the profitability of your bank in the next 6 to 12 months? (Rank according to priority with 1 - High Priority and 4 - Low Priority)



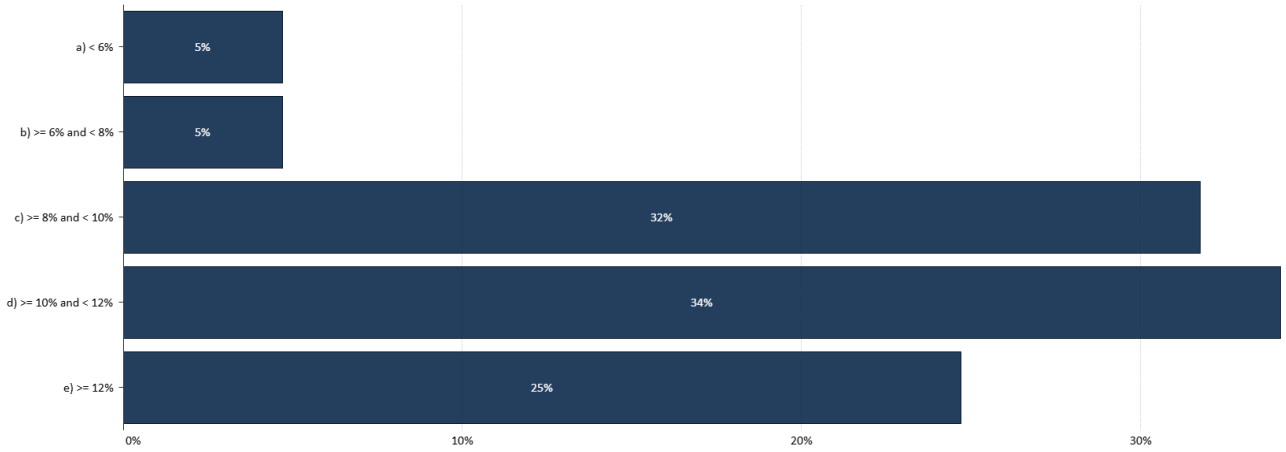
Question 2: Comparison with earlier results

1 - High Priority

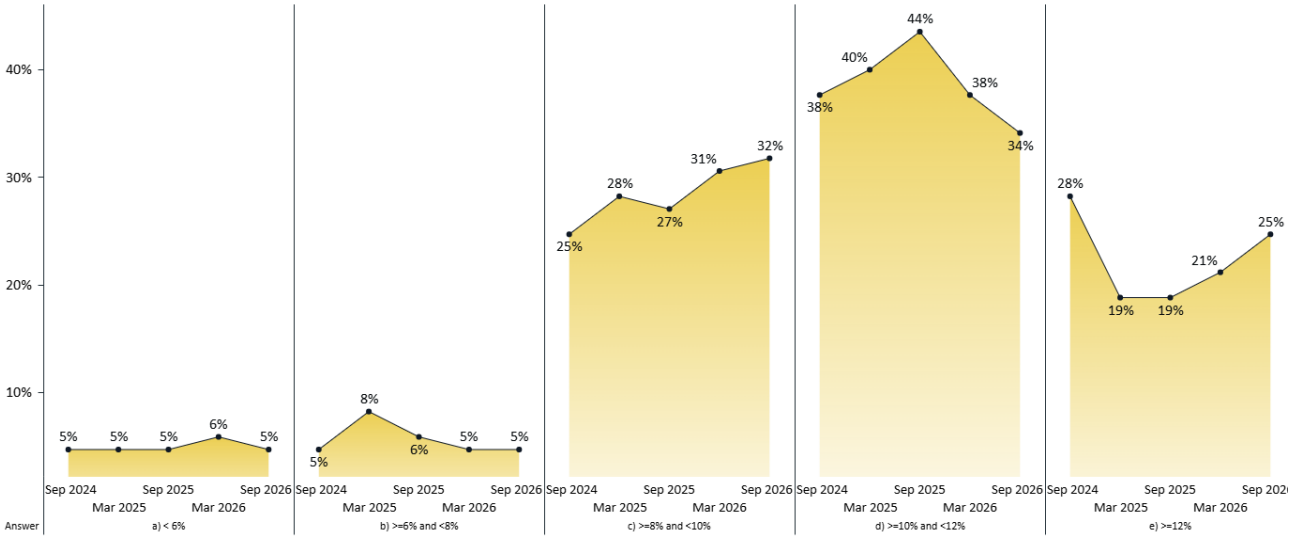


Question 3: Autumn 2026 results

Q3 What is your estimated Cost of Equity?

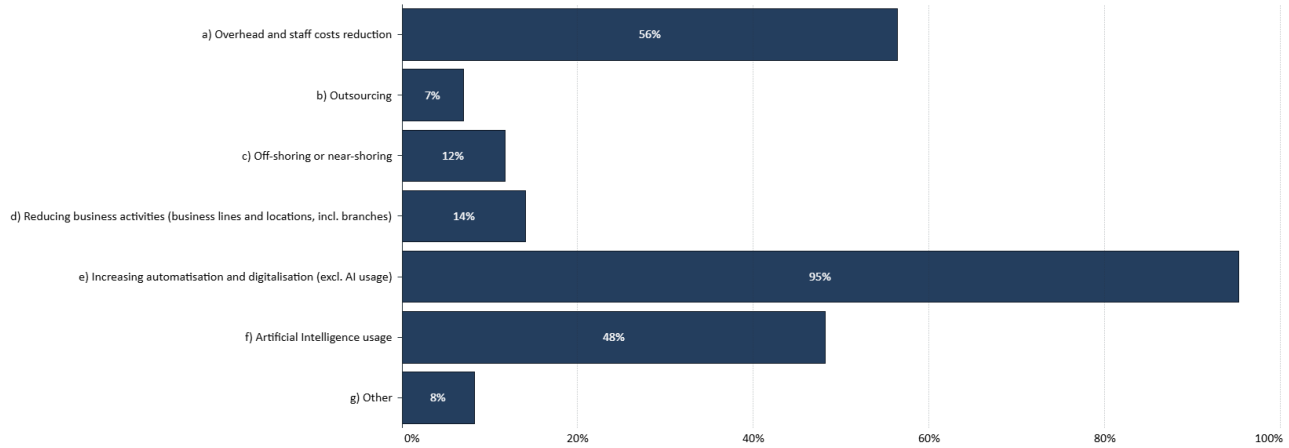


Question 3: Comparison with earlier results

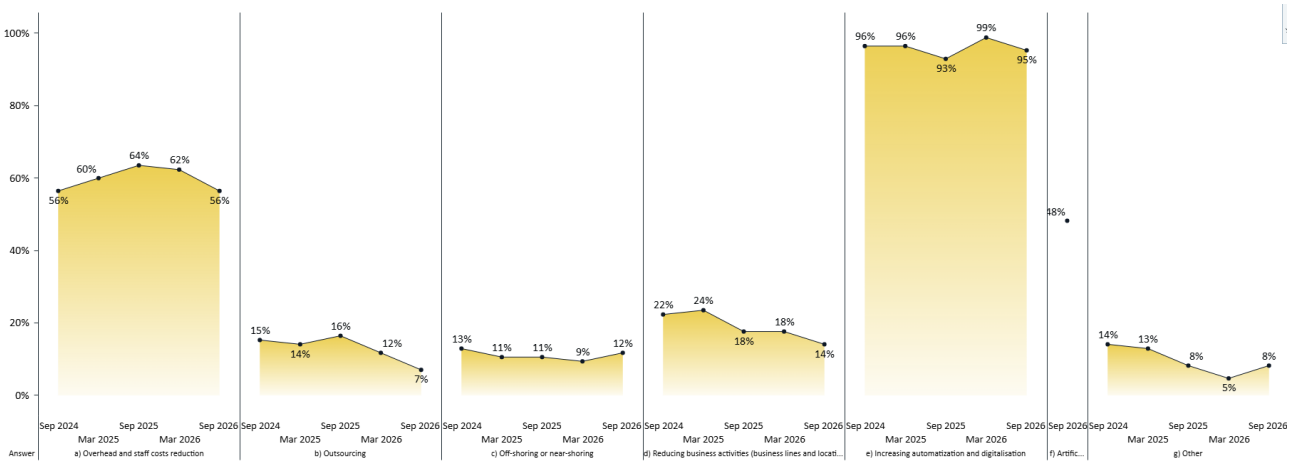


Question 4: Autumn 2026 results

Q4 Which measures are you primarily taking to reduce operating expenses / costs?

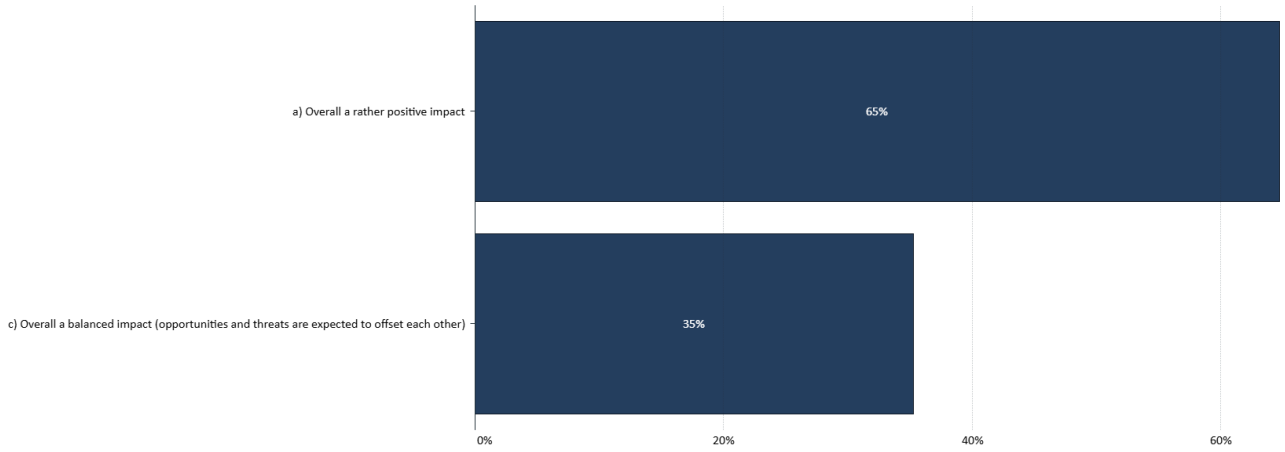


Question 4: Comparison with earlier results



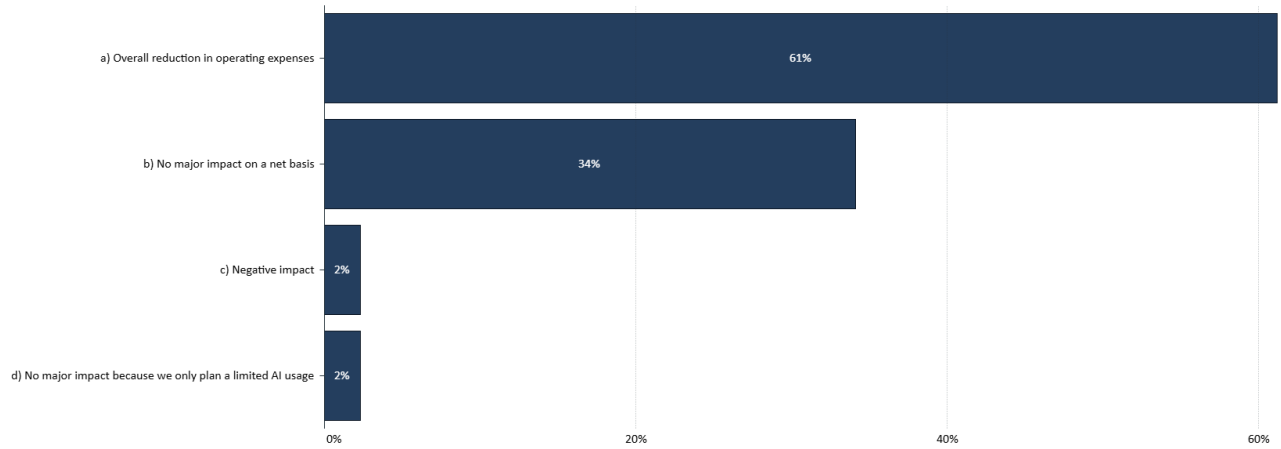
Question 5: Autumn 2026 results

Q5 Taking into account both the opportunities and threats (risks) associated with Artificial Intelligence (AI*), how would you assess its expected overall impact on your bank over the next 3-5 years? Weighing both opportunities (such as revenue rises, cost reduction, etc.), and threats (e.g. rising competition in some areas, cyber related threats etc.)?



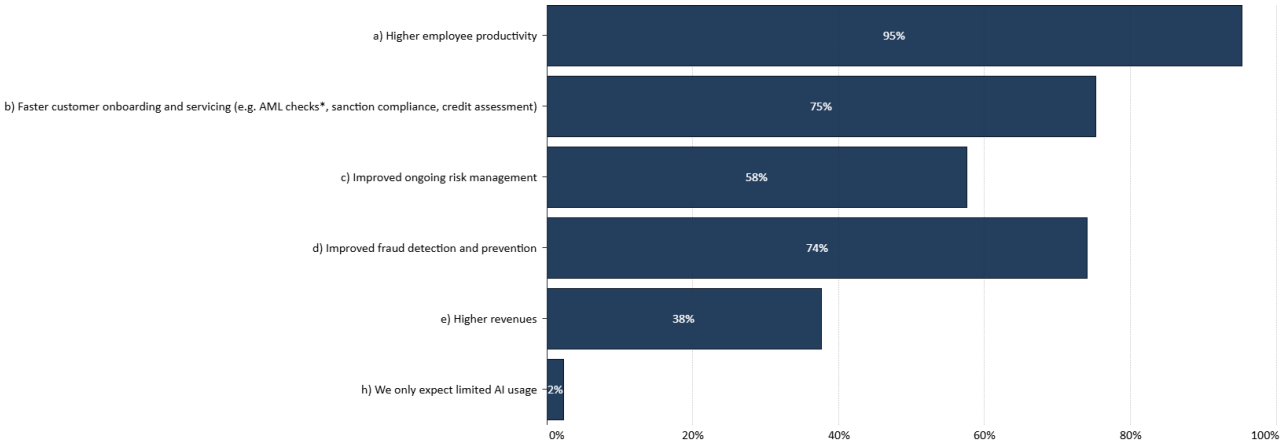
Question 6: Autumn 2026 results

Q6 What net impact do you expect AI to have on your bank's operating expenses (including personnel costs and AI related costs such as model usage inl. token based cost models, infrastructure and specialist staff)?



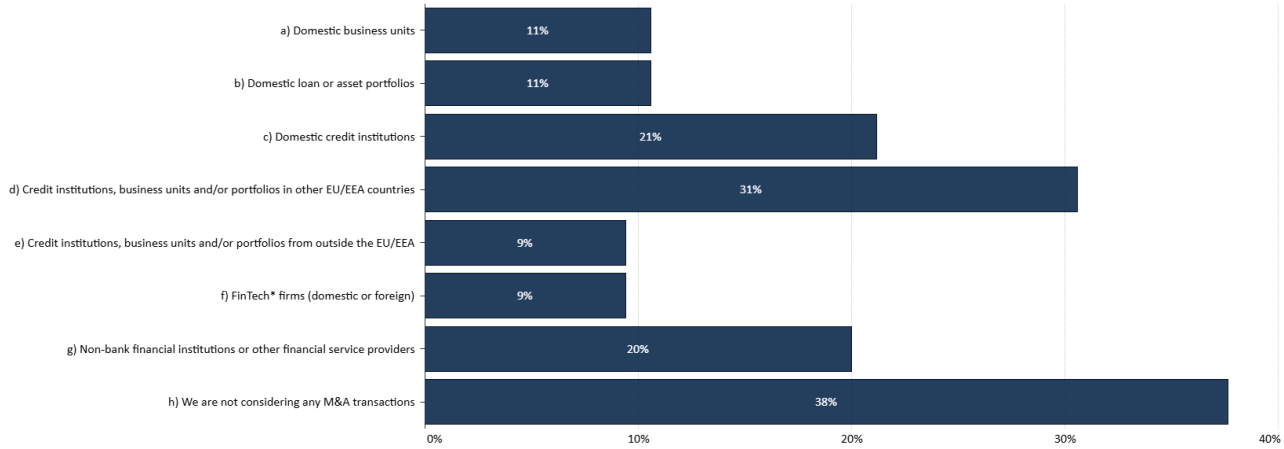
Question 7: Autumn 2026 results

Q7 In which areas would you expect the most positive impact from AI usage in your bank going forward?

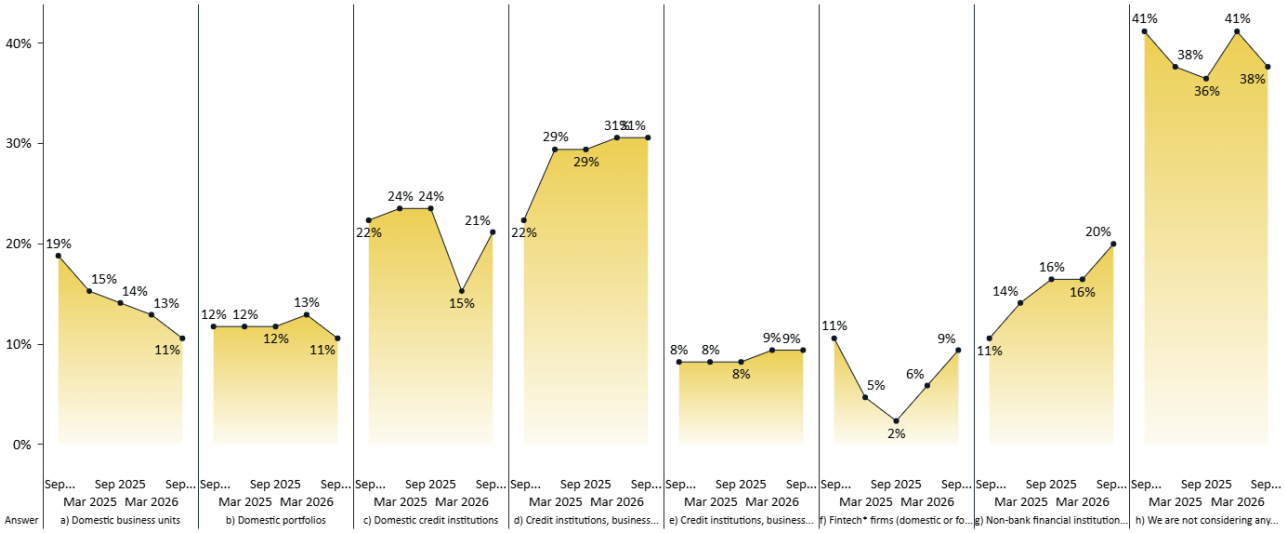


Question 8: Autumn 2026 results

Q8 Are you considering Mergers & Acquisitions (M&A*) over the next 12-24 months?

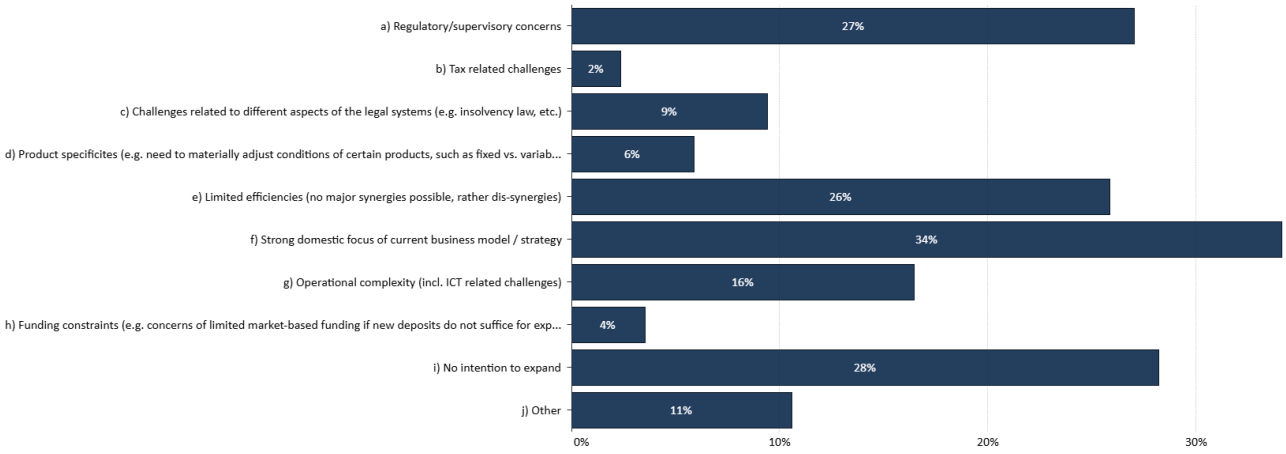


Question 8: Comparison with earlier results



Question 9: Autumn 2026 results

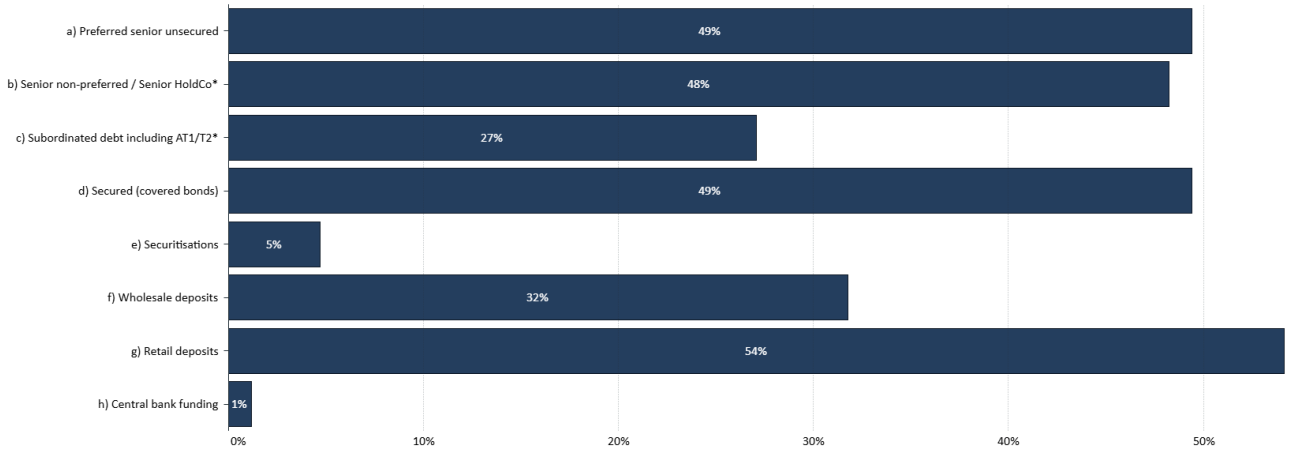
Q9 What is the main obstacle to expanding your business into other EU/EEA countries



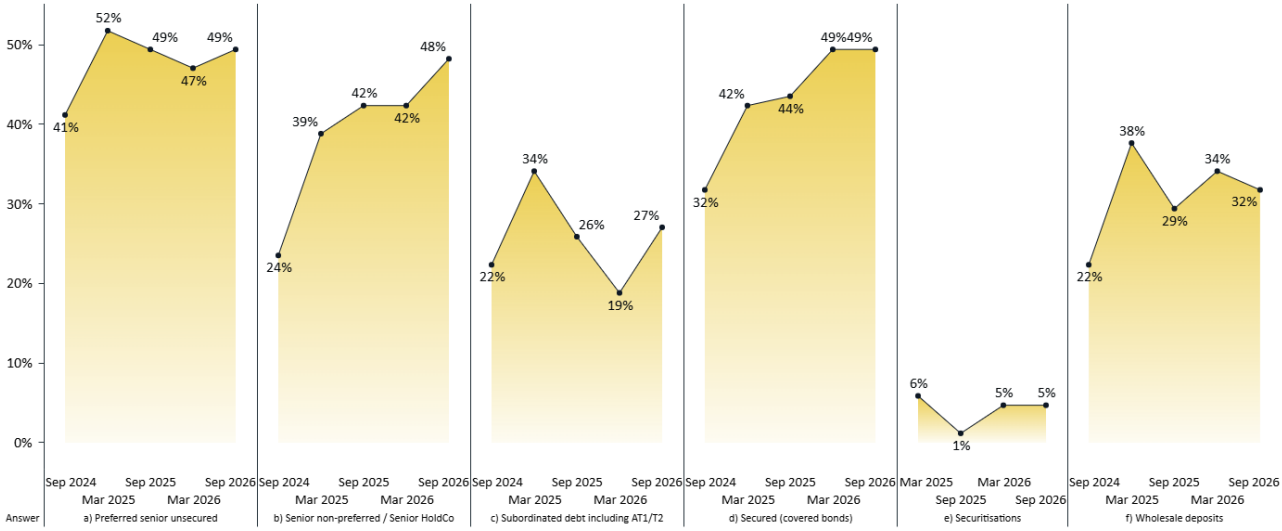
2. Funding and liquidity

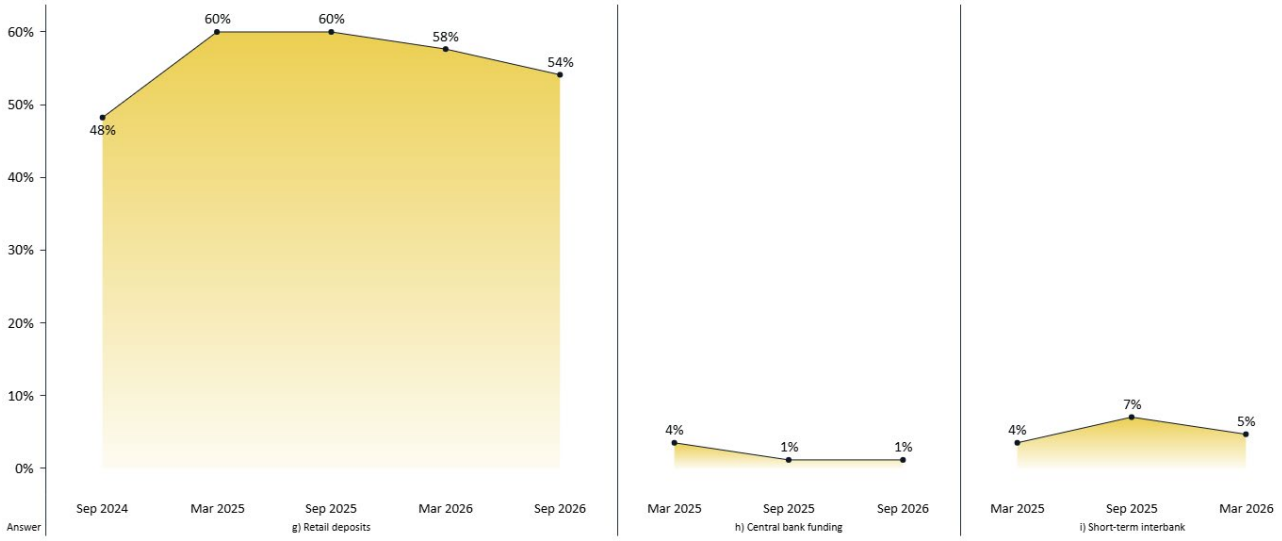
Question 10: Autumn 2026 results

Q10 Which funding instruments does your institution expect to issue or make greater use of over the next 12 months?



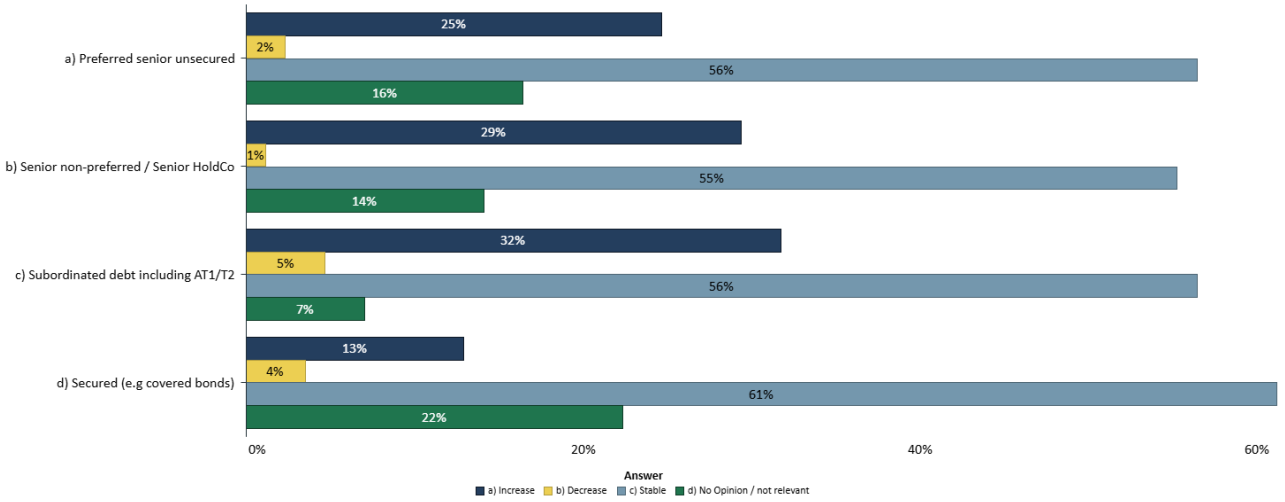
Question 10: Comparison with earlier results





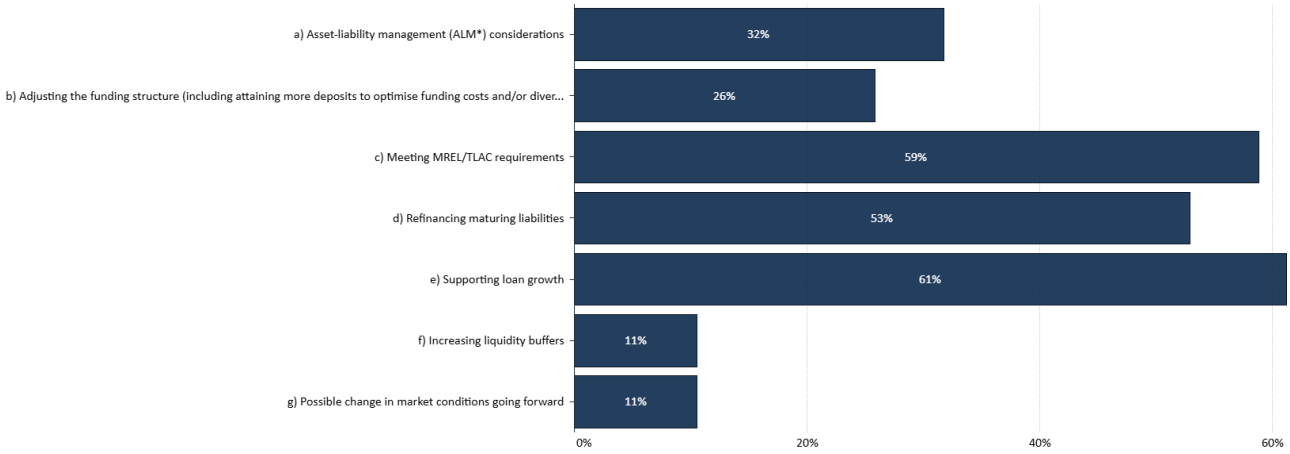
Question 11: Autumn 2026 results

Q11 Over the next 12 months, what are your expectations regarding cost trends (i.e. spreads) for your bank across the following funding sources? Please consider the overall expected direction during the 12-month period, regardless of any interim volatility.



Question 12: Autumn 2026 results

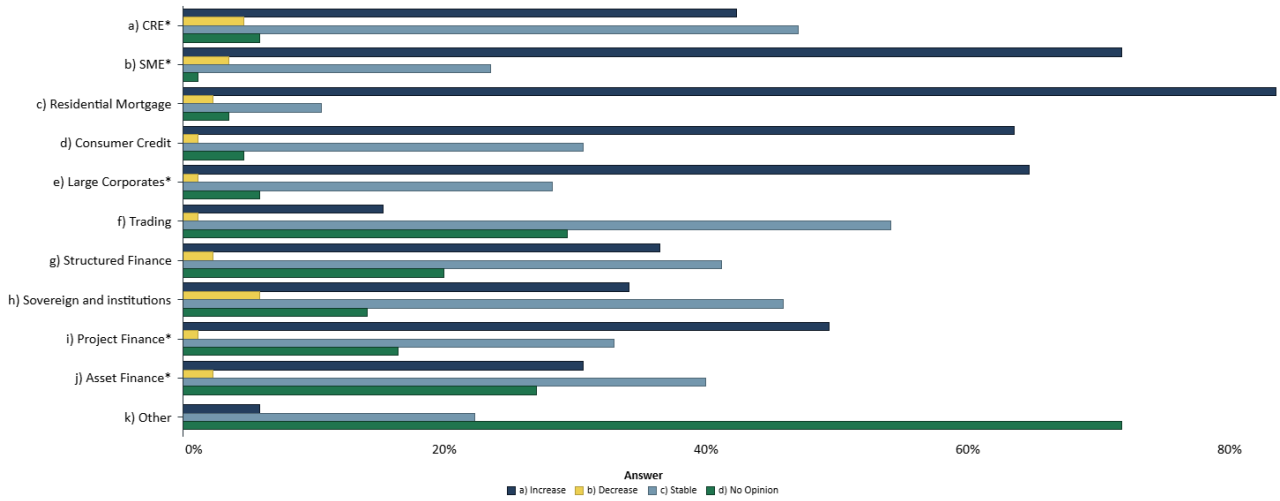
Q12 What is the primary driver of your expected funding strategy over the next 12 months?



3. Asset composition and quality

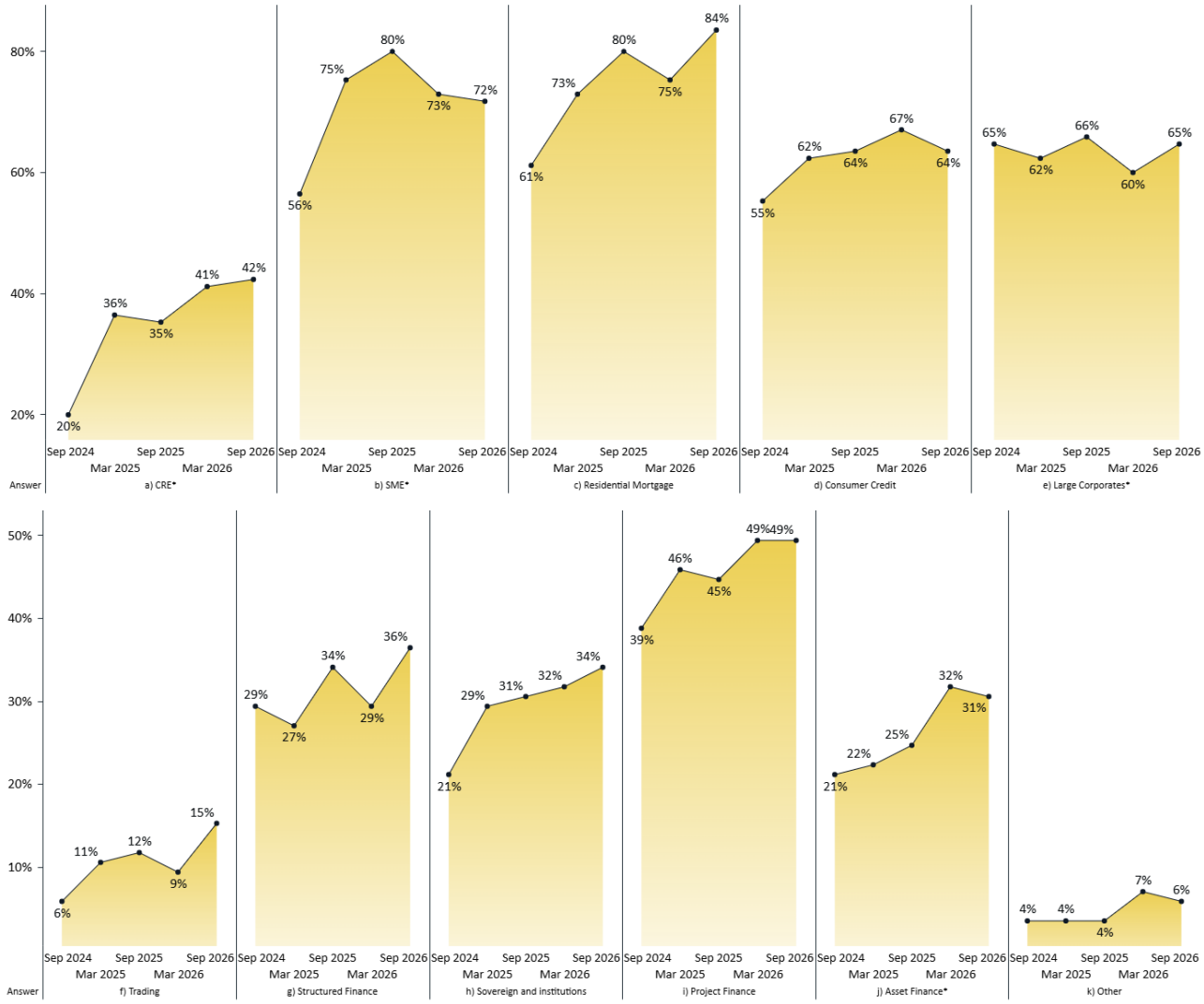
Question 13: Autumn 2026 results

Q13 Which portfolios do you plan to increase/decrease in volume during the next 12 months (on a net basis)?



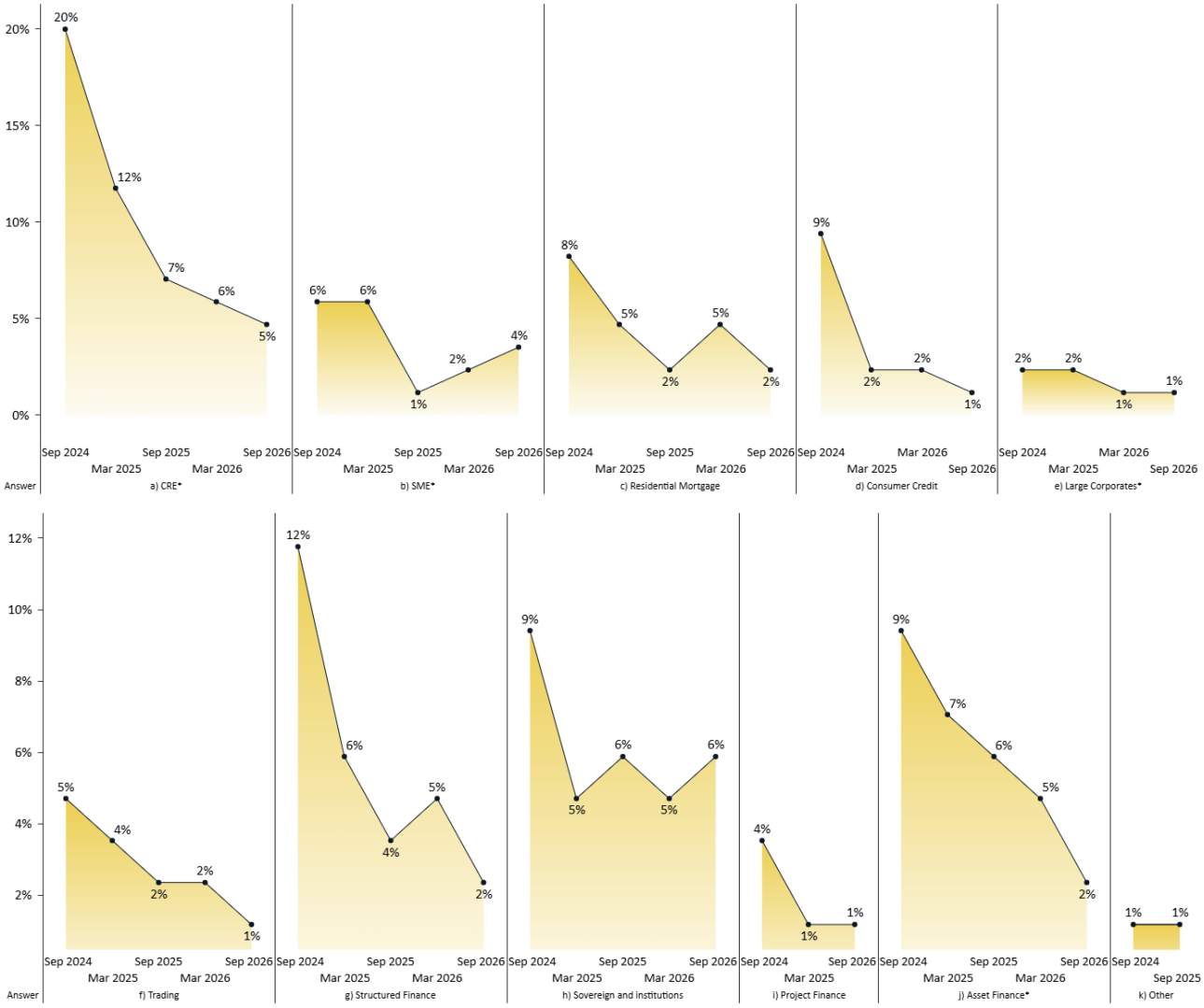
Question 13: comparison with earlier results

INCREASE



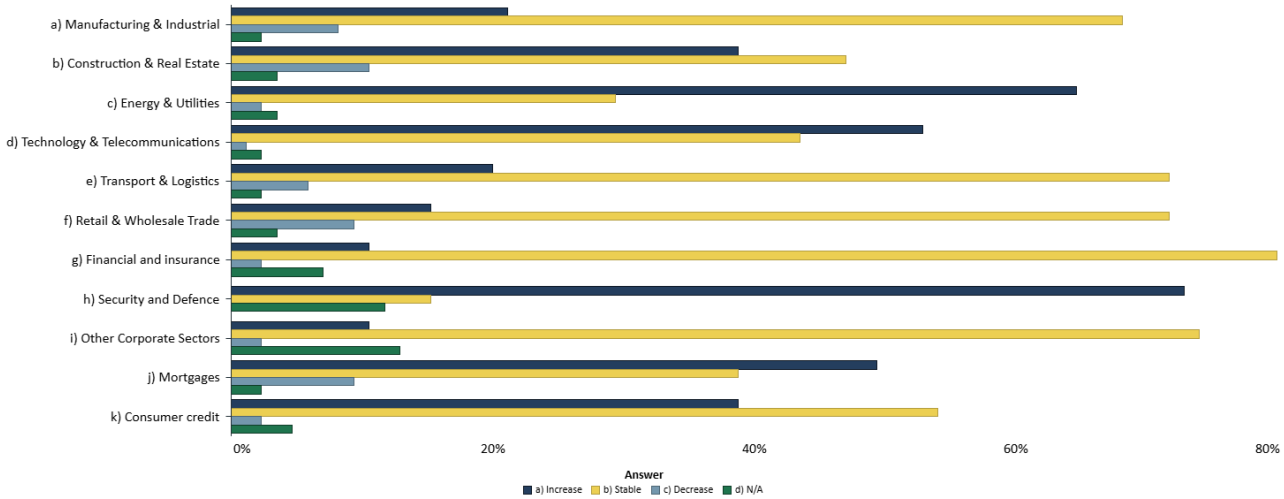
Question 13: comparison with earlier results (cont)

DECREASE



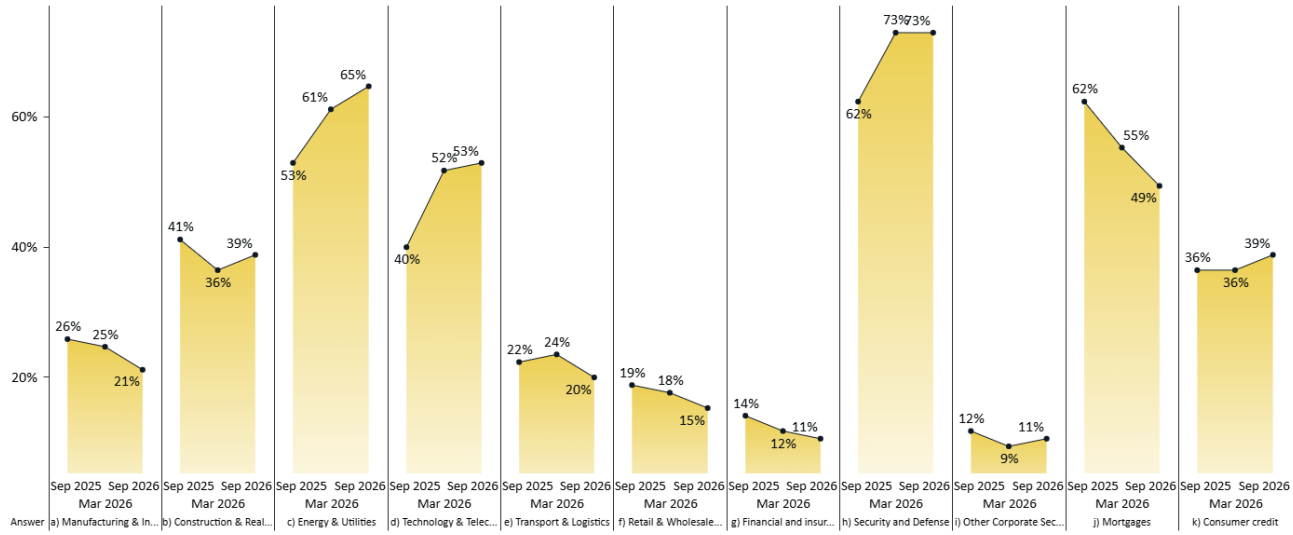
Question 14: Autumn 2026 results

Q14 How would you assess loan demand during the next 12 months across the following corporate and household sectors?

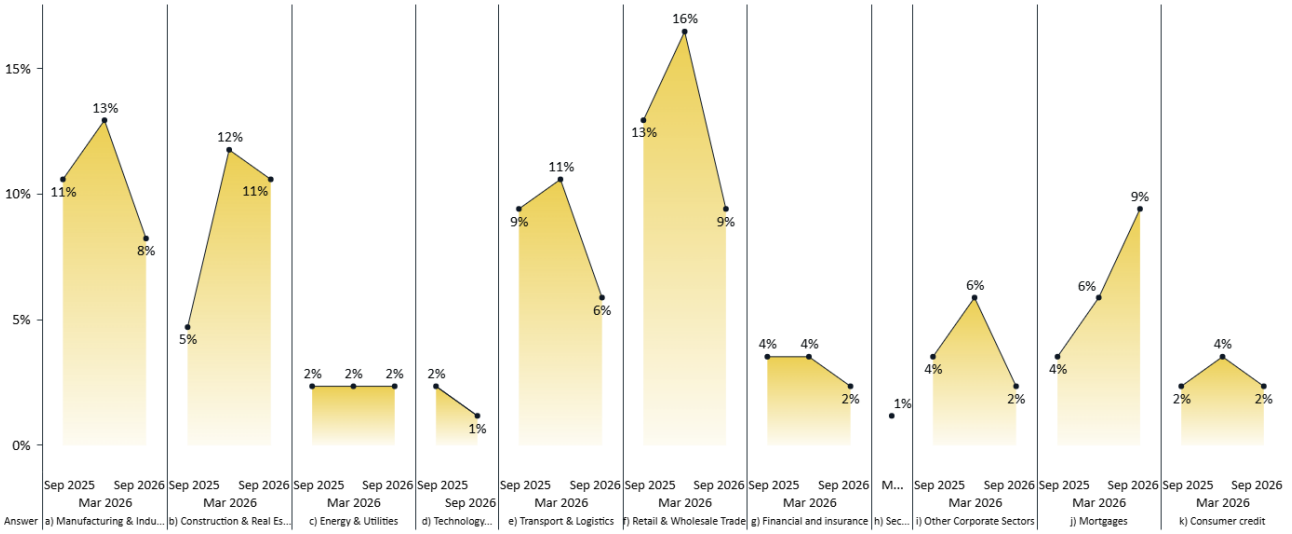


Question 14: comparison with earlier results

INCREASE

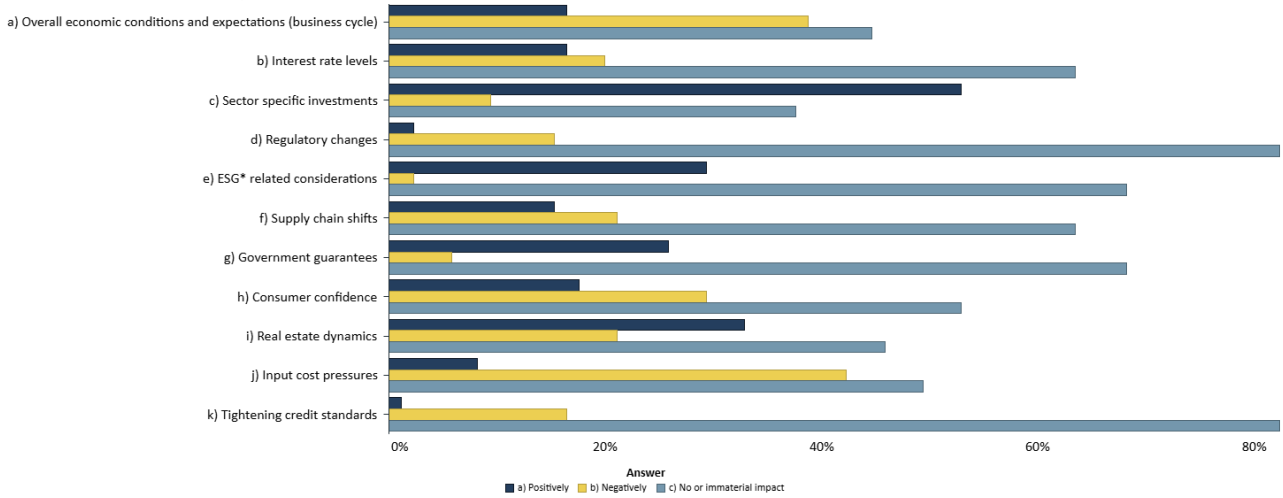


DECREASE



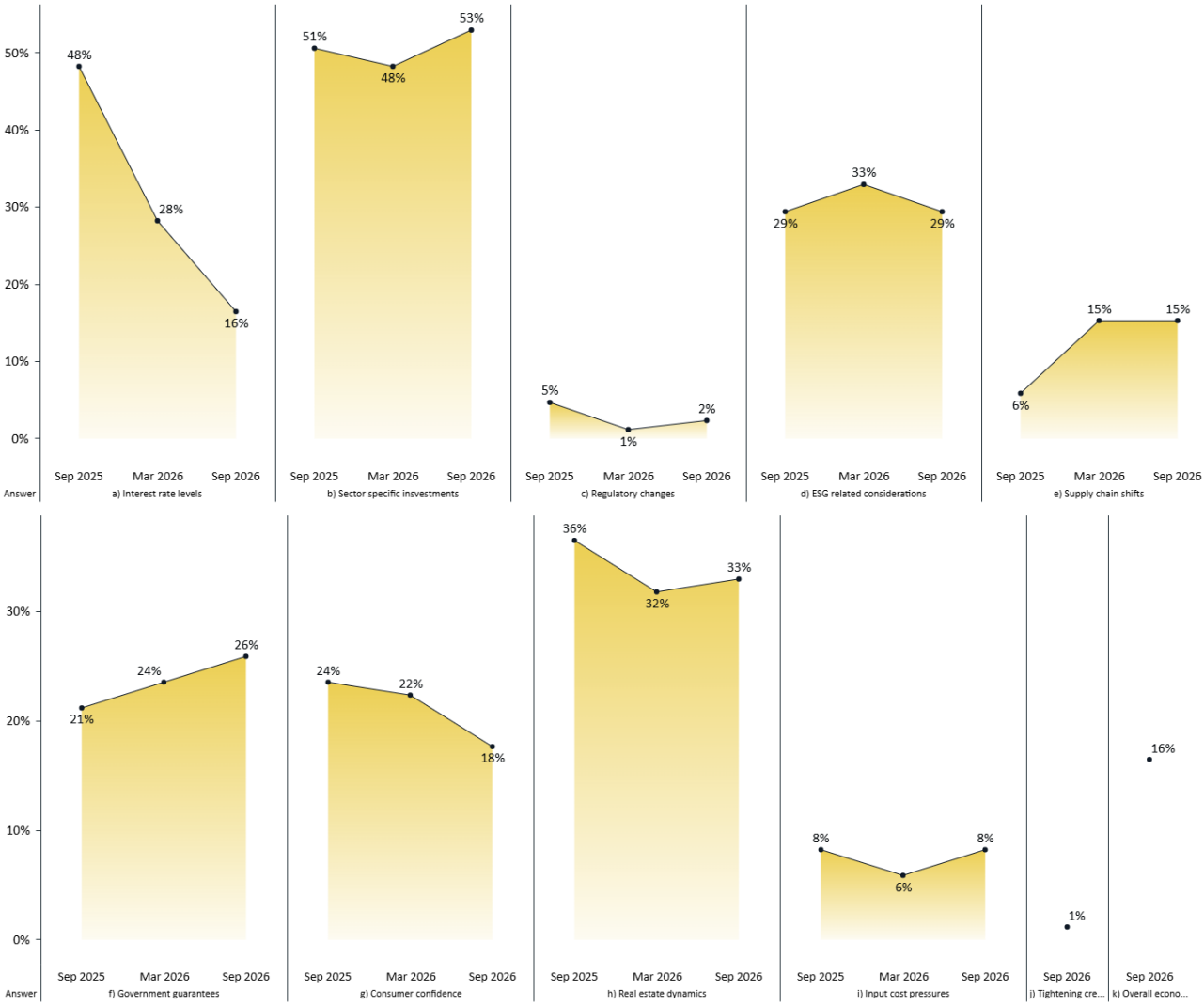
Question 15: Autumn 2026 results

Q15 How have the following factors affected (over the last 6 months) demand for corporate loans?



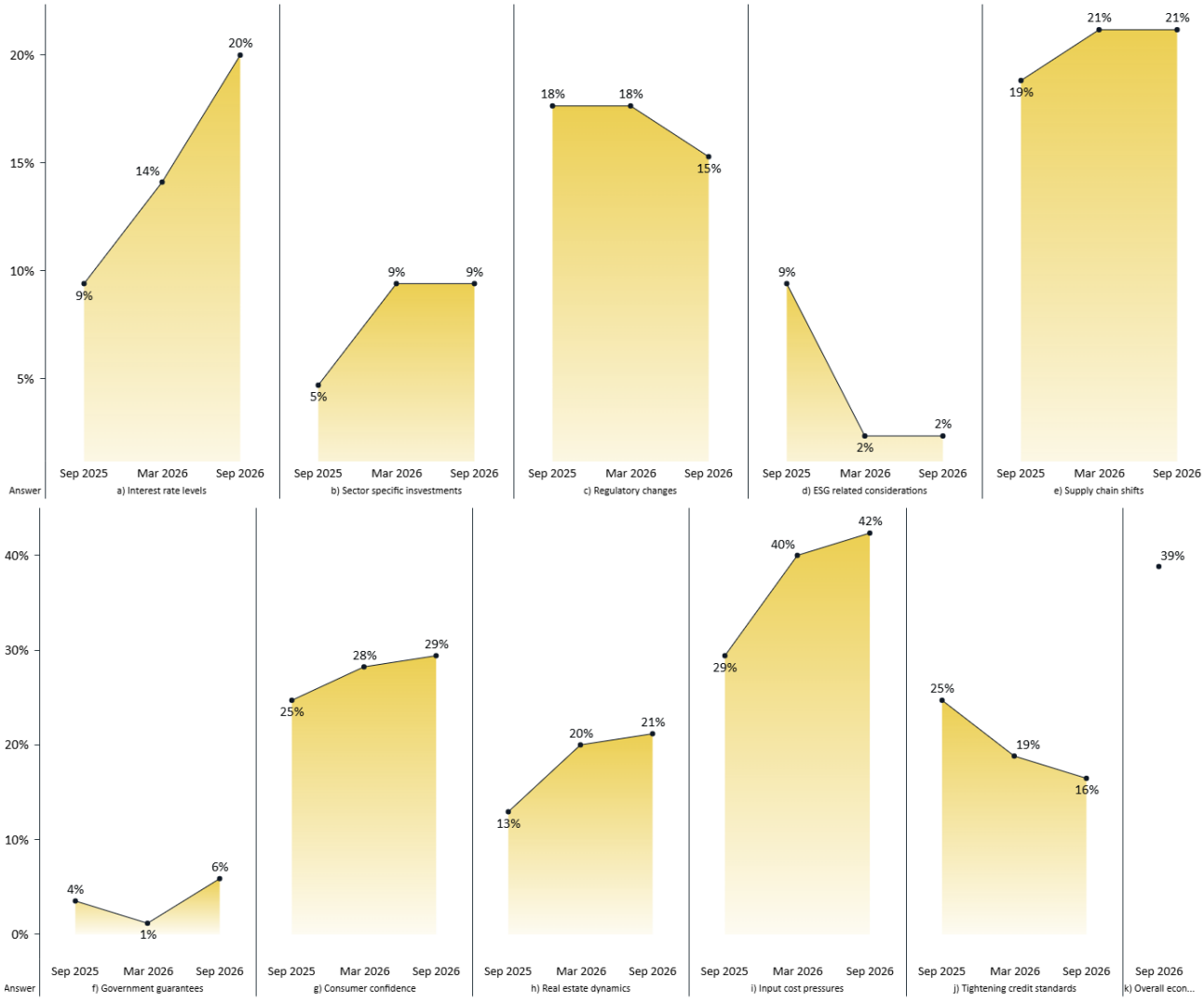
Question 15: comparison with earlier results

POSITIVELY



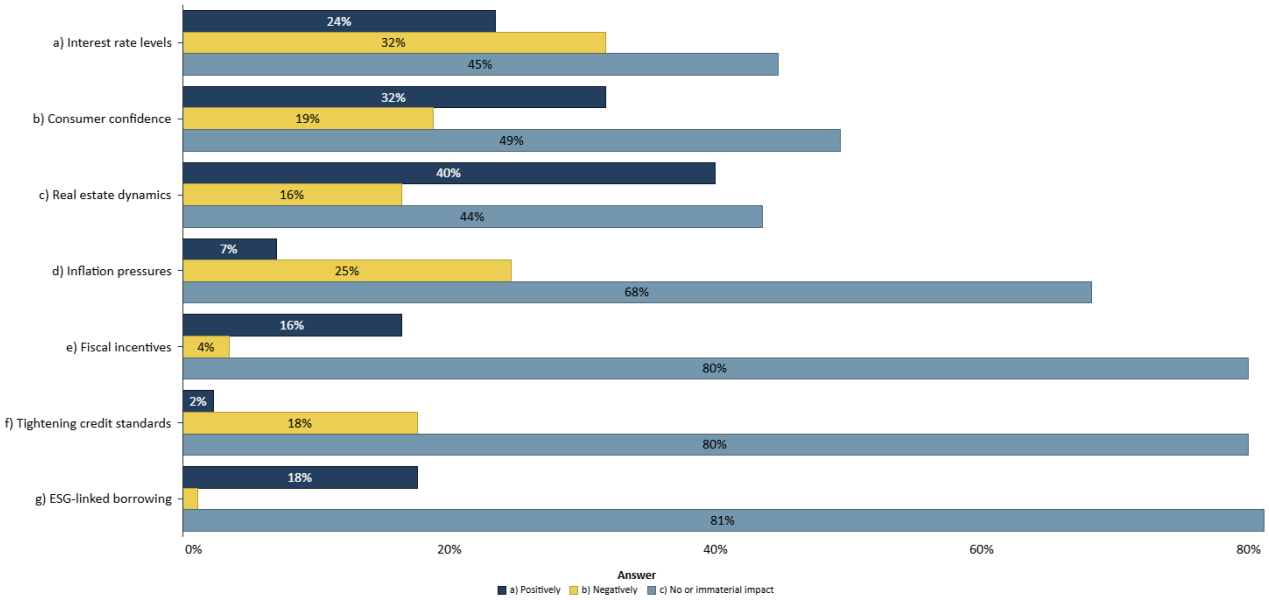
Question 15: comparison with earlier results (cont)

NEGATIVELY



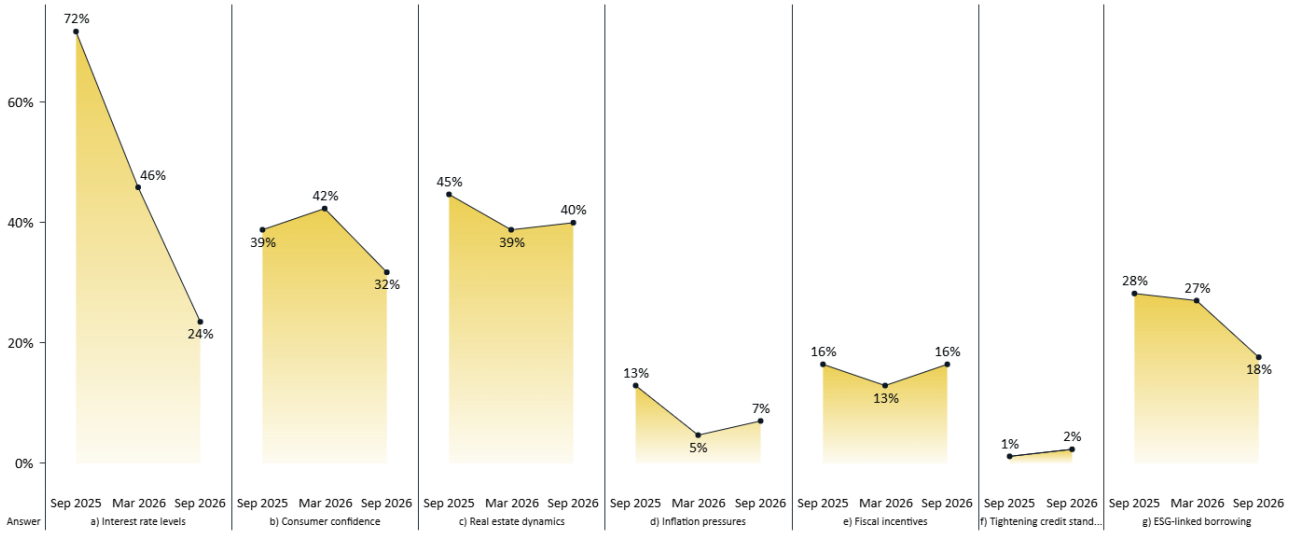
Question 16: Auttumn 2026 results

Q16 How have the following factors affected (over the last 6 months) demand for household loans?

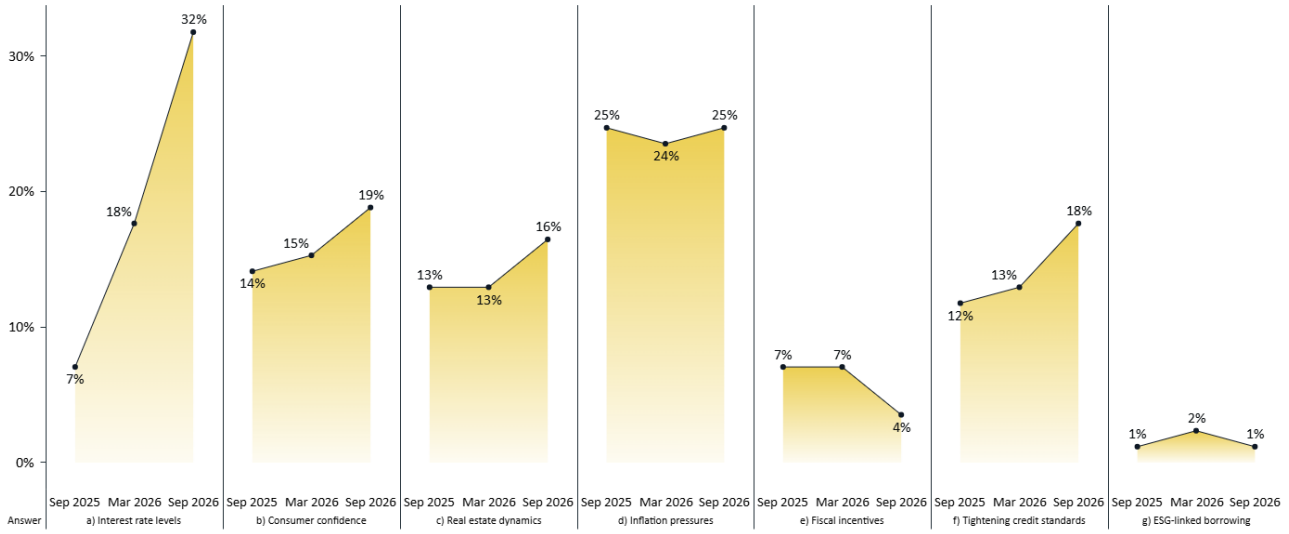


Question 16: comparison with earlier results

POSITIVELY

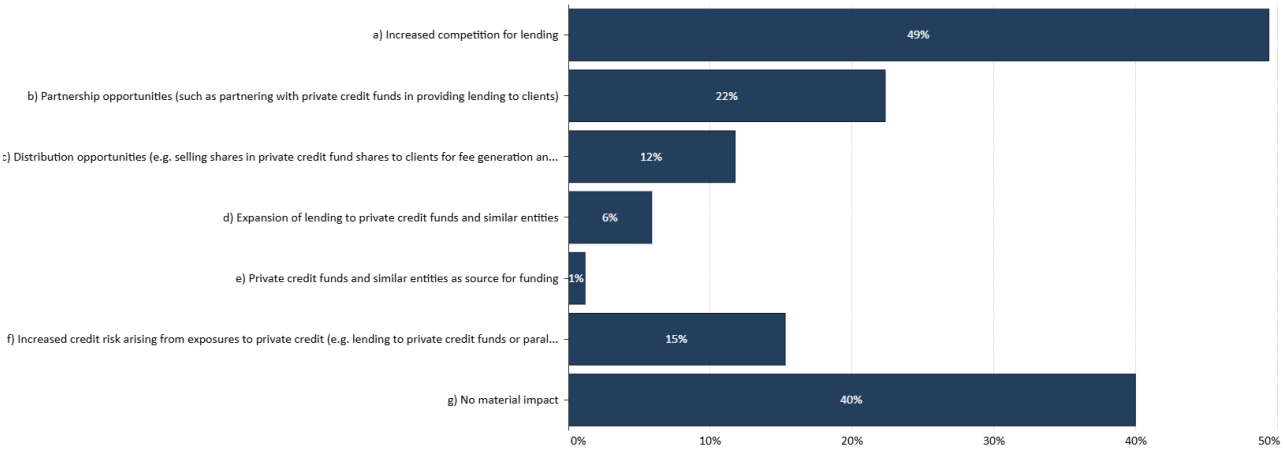


NEGATIVELY



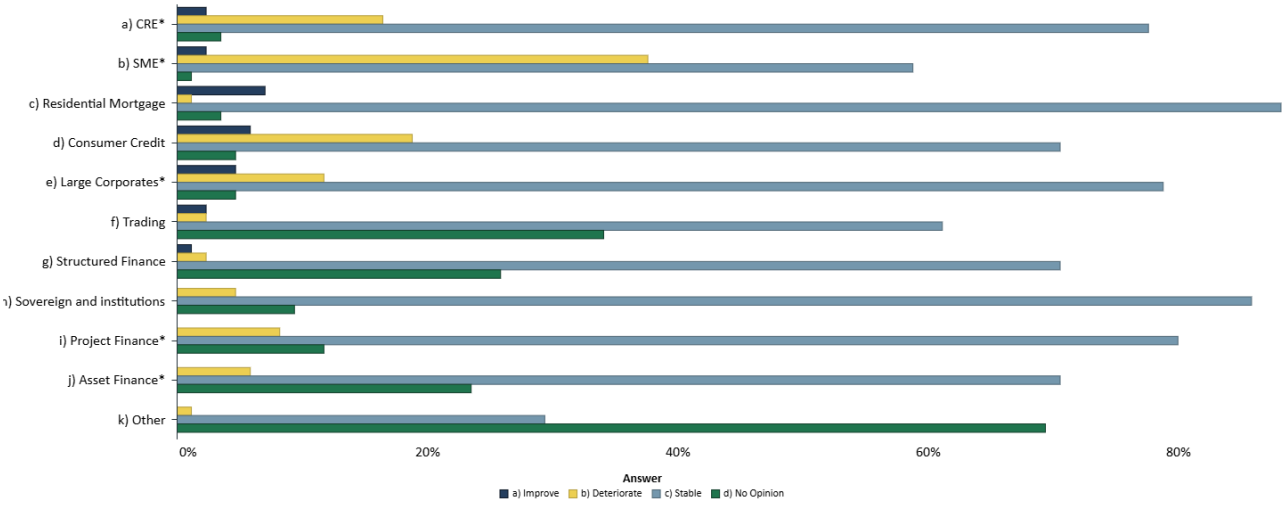
Question 17: Autumn 2026 results

Q17 How do you expect the developments (including performance) of private credit markets to affect your institution over the next two years?



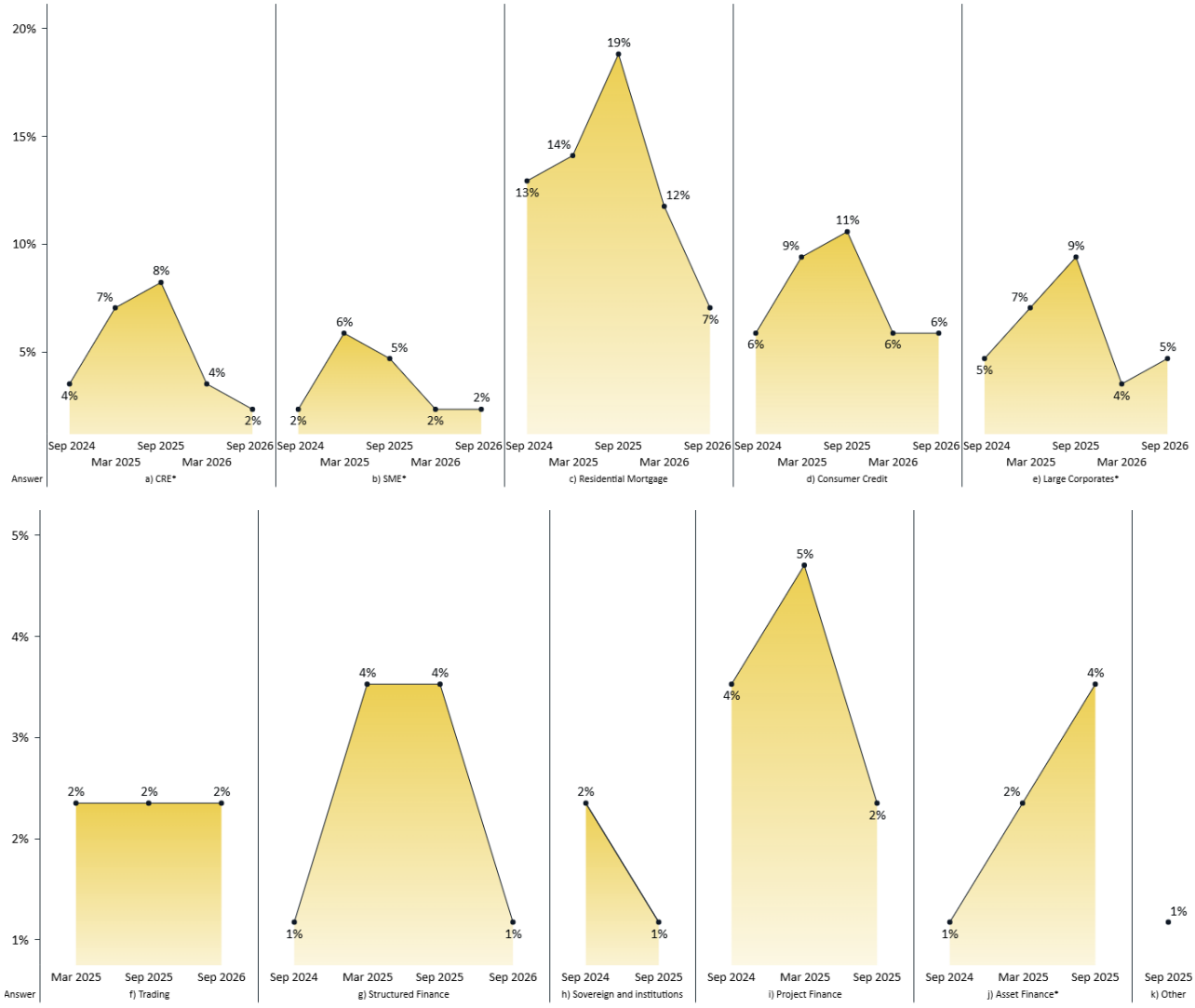
Question 18: Autumn 2026 results

Q18 Which portfolios do you expect to improve/deteriorate in asset quality in the next 12 months?



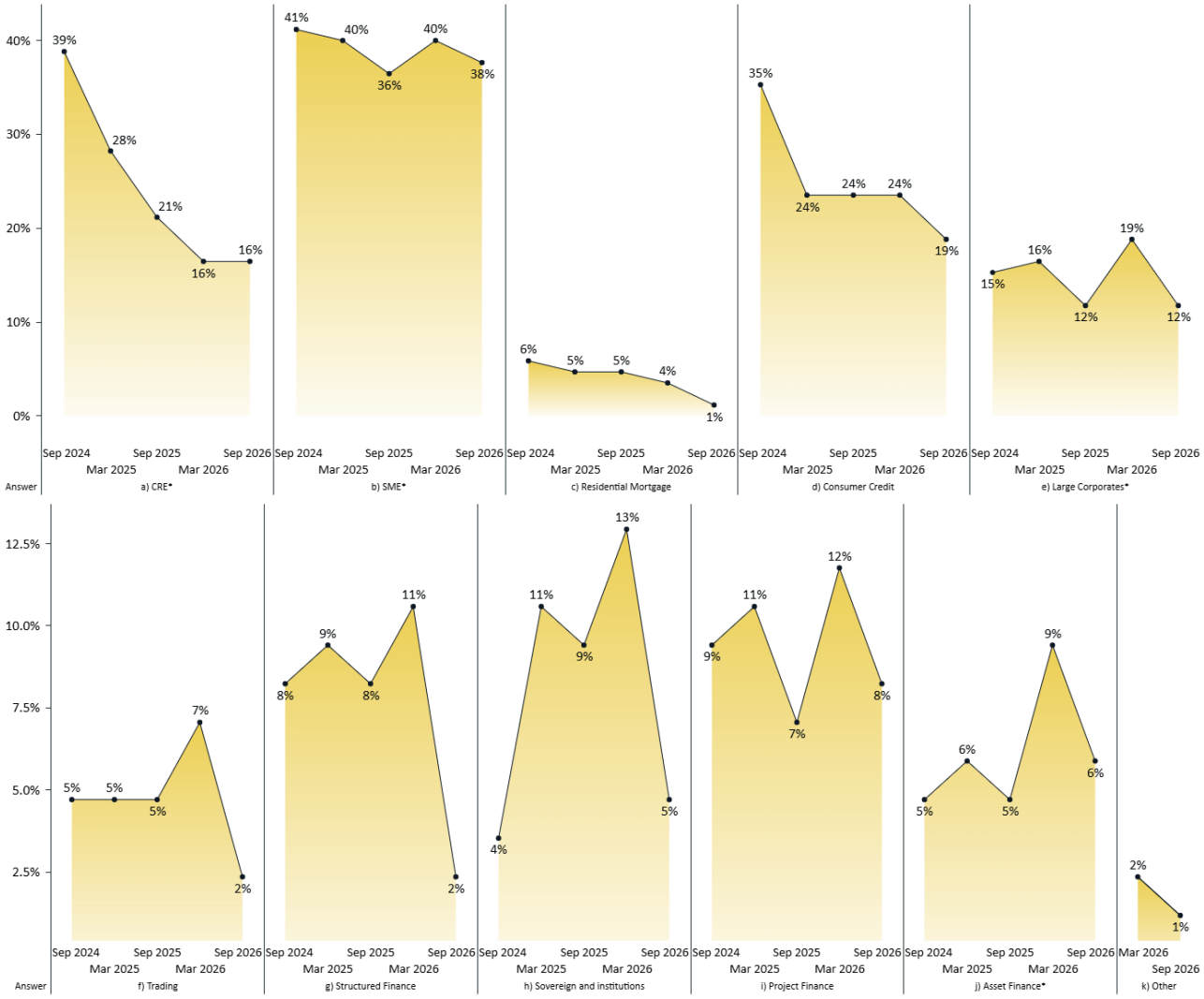
Question 18: comparison with earlier results

IMPROVE



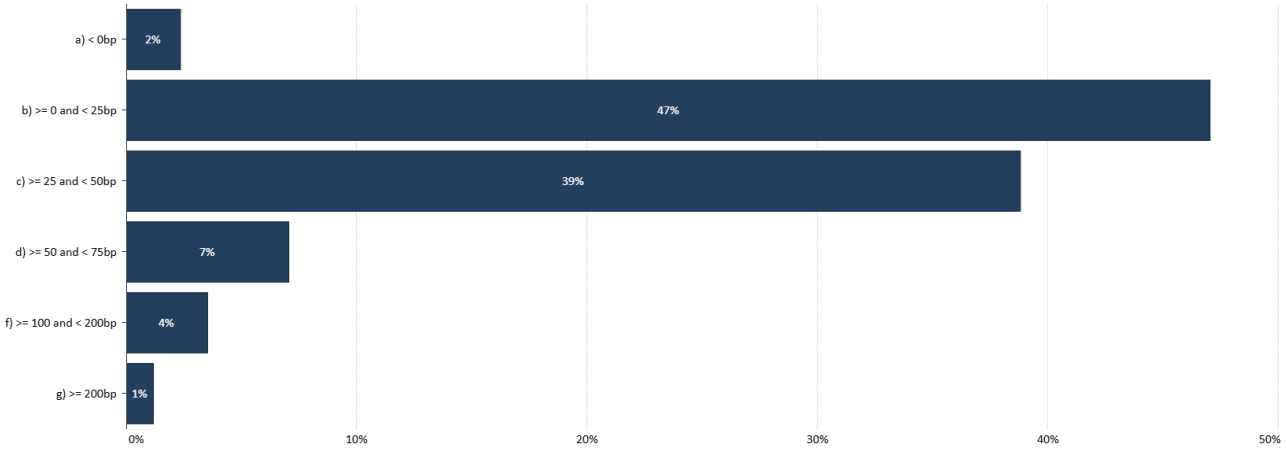
Question 18: comparison with earlier results (cont)

DETERIORATE

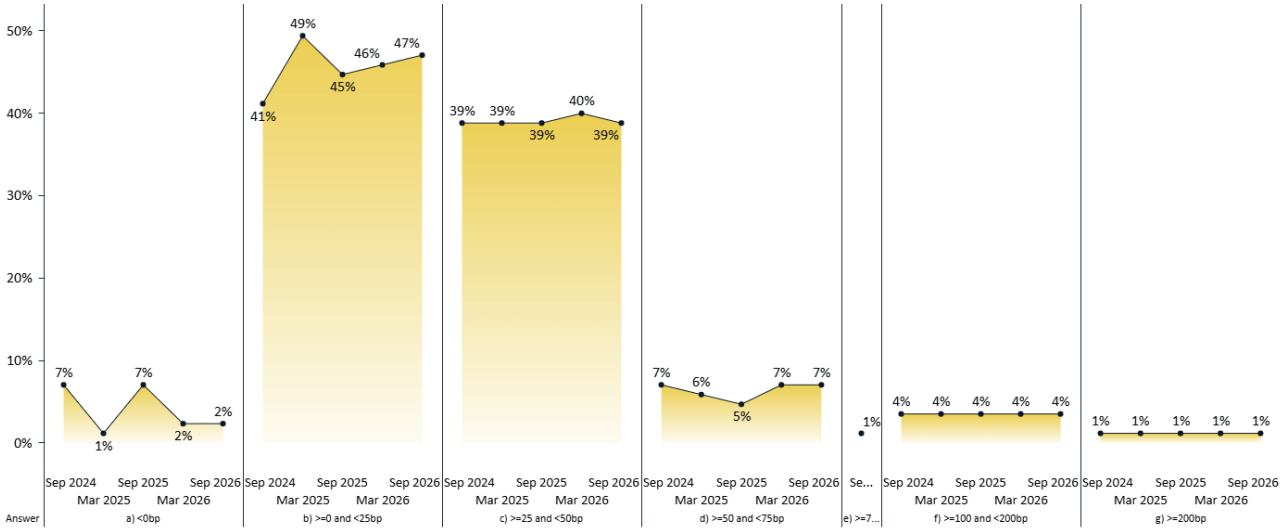


Question 19: Spring 2026 results

Q19 What is your Cost of Risk* estimation for the current financial year?

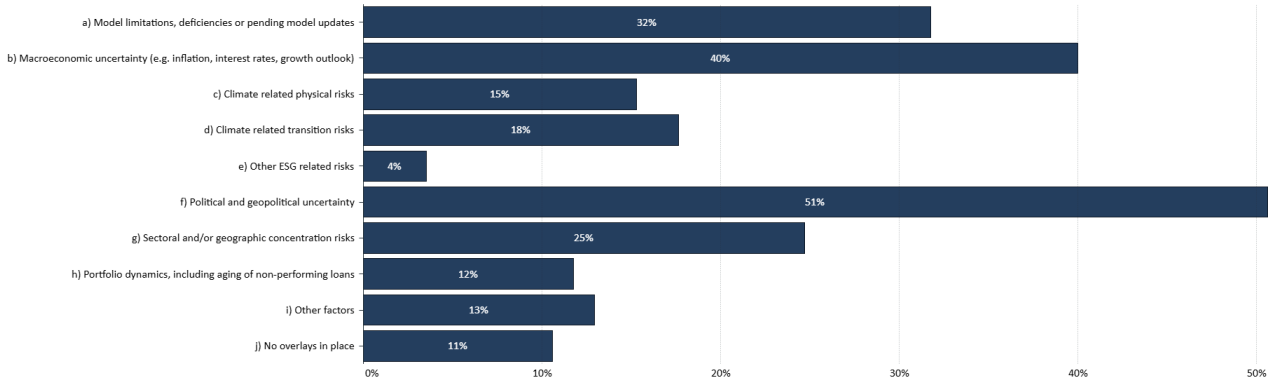


Question 19: comparison with earlier results



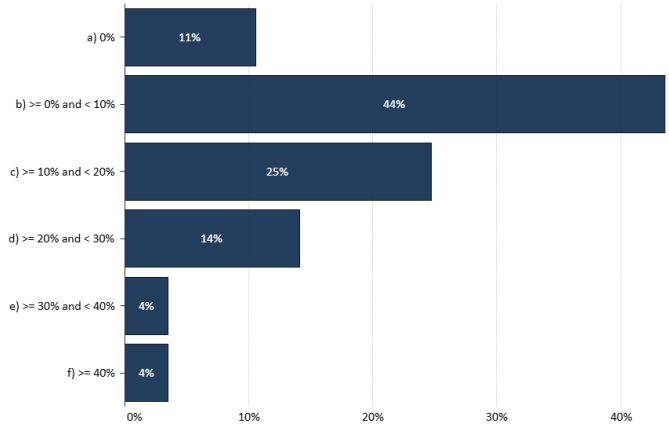
Question 20: Autumn 2026 results

Q20 If you have any management provisioning overlays in place, which factors are they primarily intended to address?

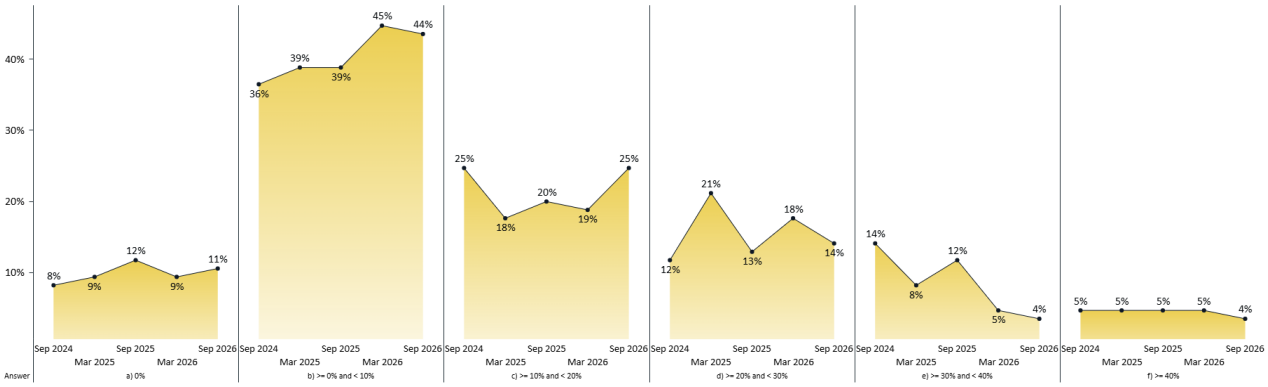


Question 21: Autumn 2026 results

Q21 Which is the proportion of the total ECL* (expected credit loss) amount that is recognised via management provisioning overlays?



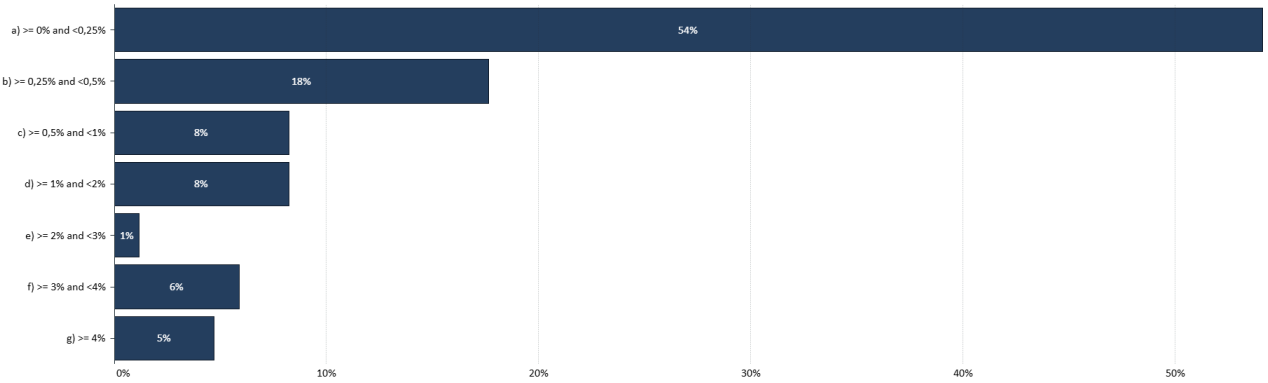
Question 21: comparison with earlier results



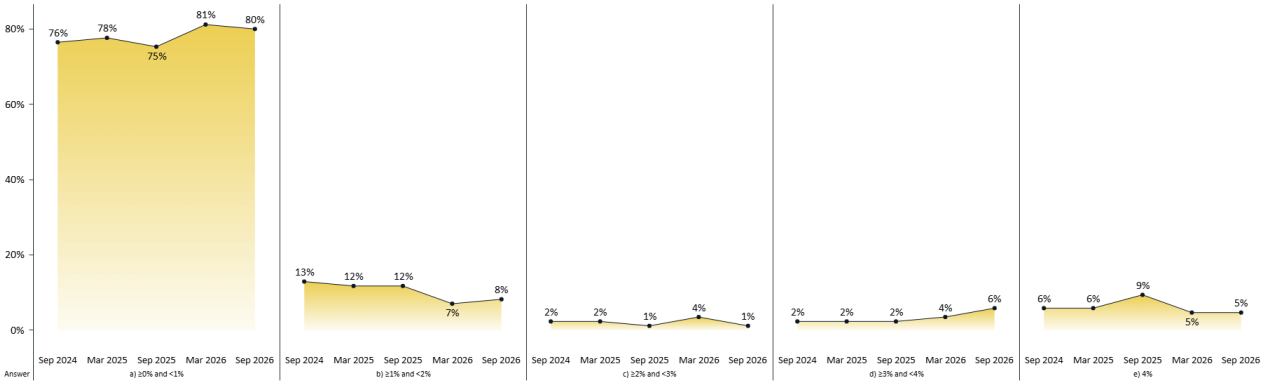
4. Conduct, Reputational and Operational Risk

Question 22: Autumn 2026 results

Q22 Over the past three years, how much has your firm paid out in the form of compensation, redress, litigation and similar payments (as percentage of equity*)?

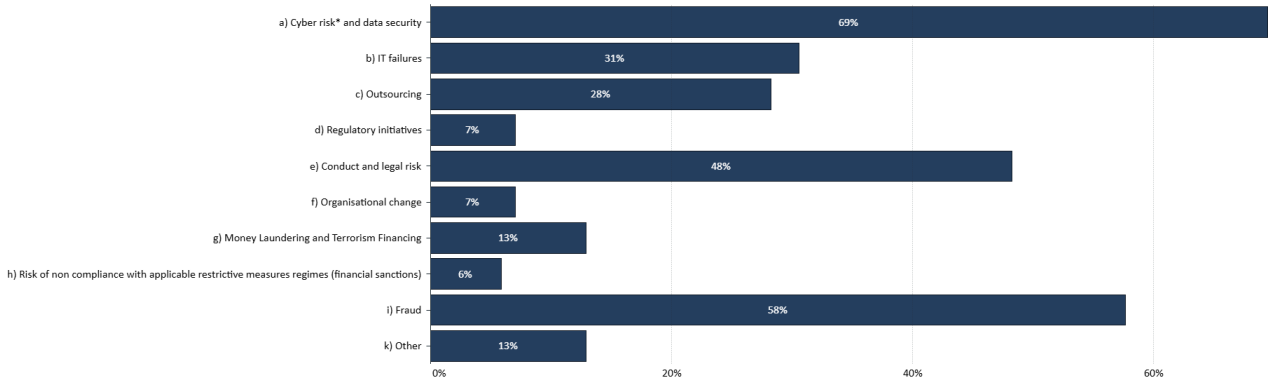


Question 22: comparison with earlier results

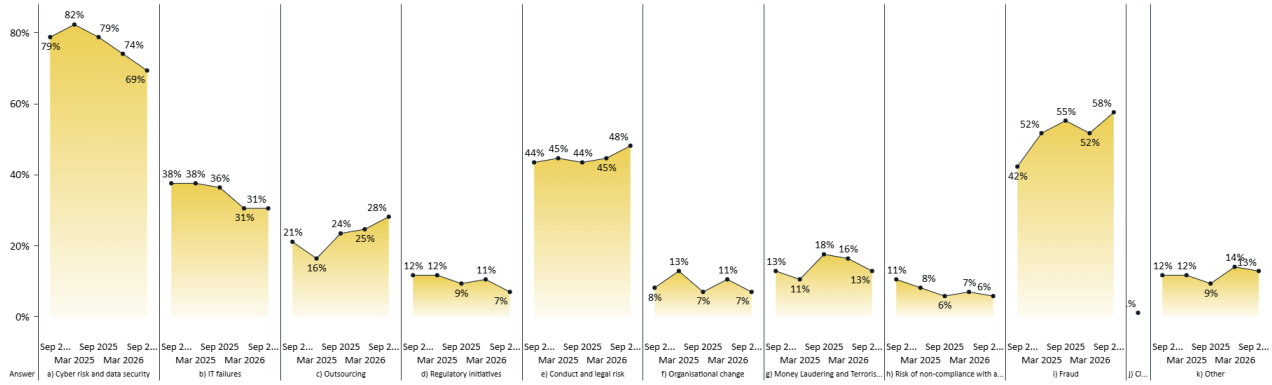


Question 23: Autumn 2026 results

Q23 Which are the main drivers of operational risk?

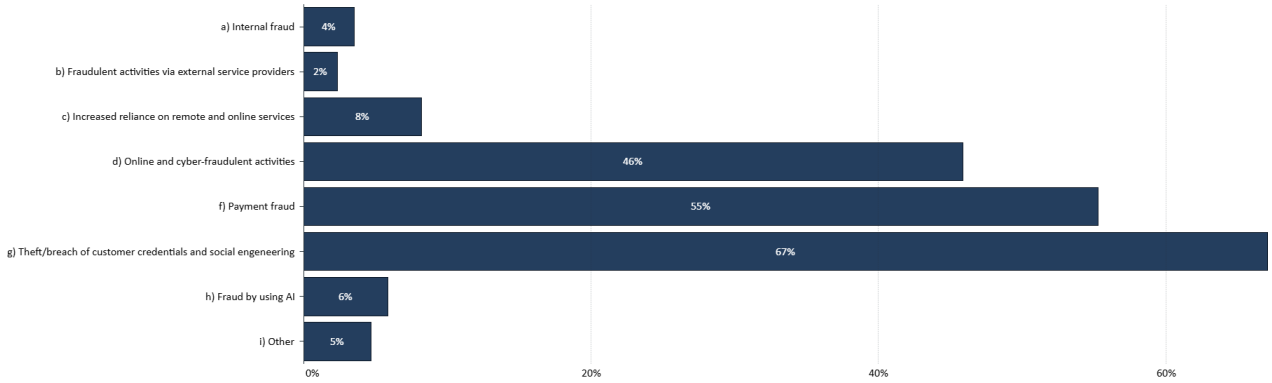


Question 23: comparison with earlier results



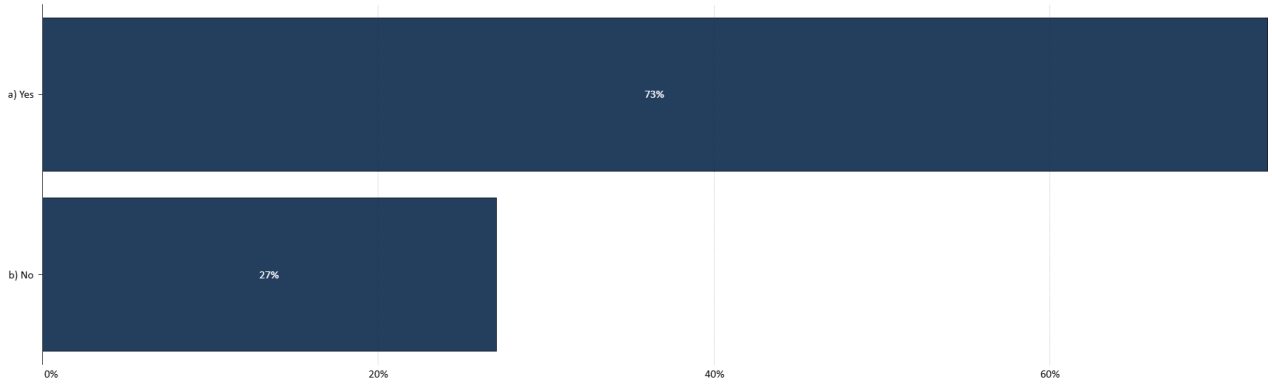
Question 24: Autumn 2026 results

Q24 What are the main drivers of fraud risk?



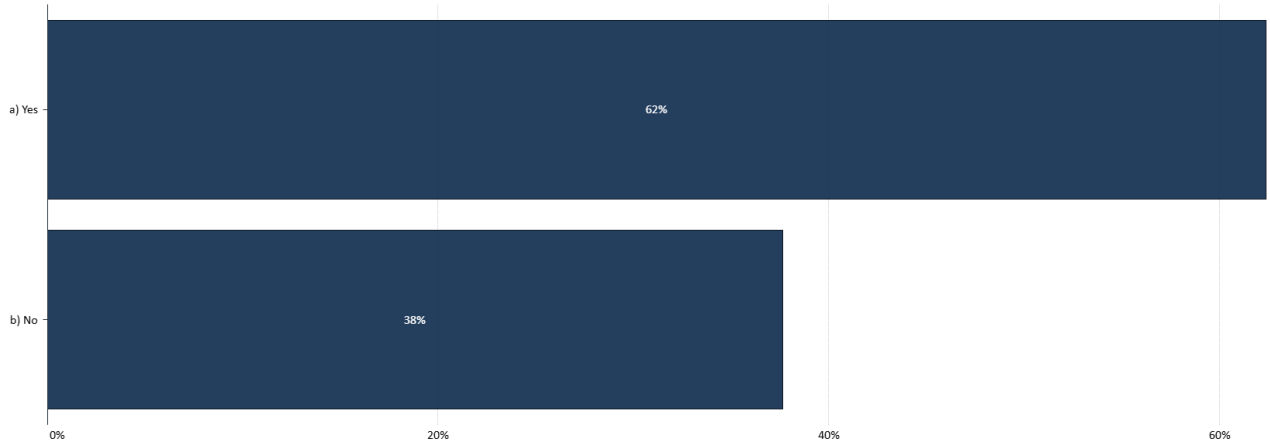
Question 25: Autumn 2026 results

Q25 Have you gained access to and/or are you making use of so-called latest versions of frontier AI* models (including but not limited to Mythos, Opus 4.7, GPT-5.6 and Gemini 3.1 Pro)?



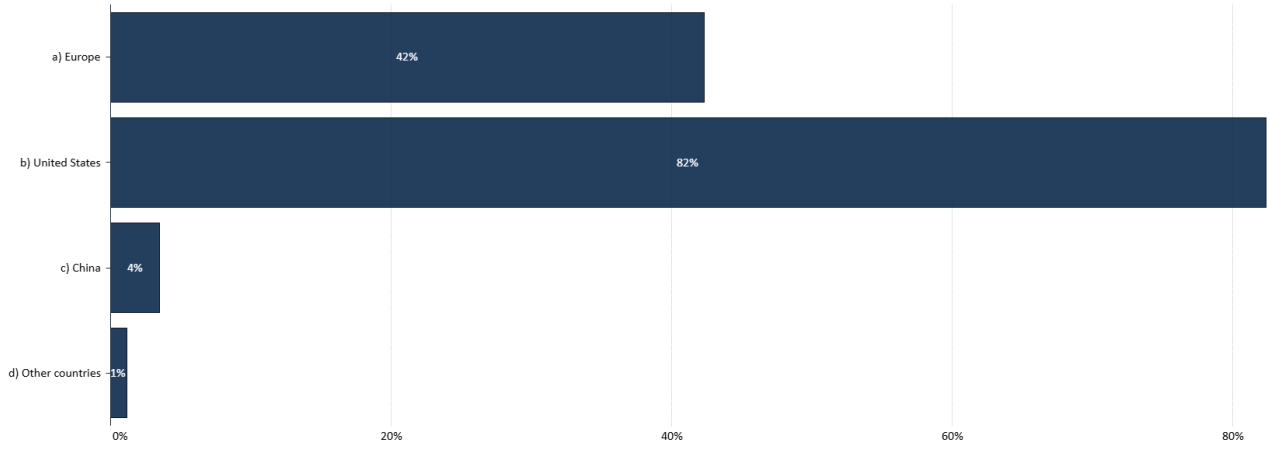
Question 25.1: Autumn 2026 results

Q25.1 Do you use AI models for detection and remediation of software flaws, system weaknesses and similar?



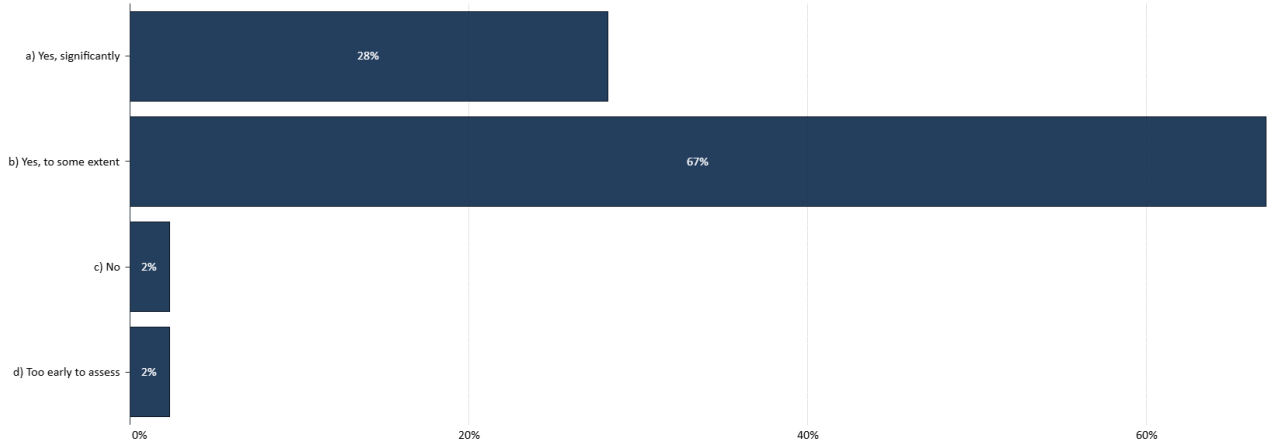
Question 25.2: Autumn 2026 results

Q25.2 From which geographical regions do you primarily source the AI models used by your institution?



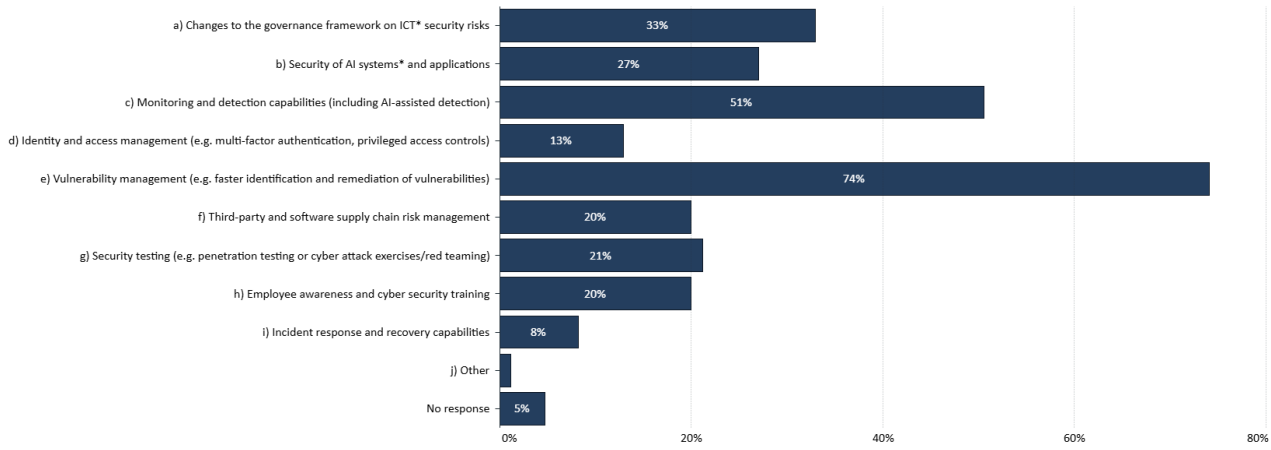
Question 26: Autumn 2026 results

Q26 Have recent developments in the cyber threat landscape, including AI-enabled cyber threats, led your institution to modify its cybersecurity* strategy or controls?



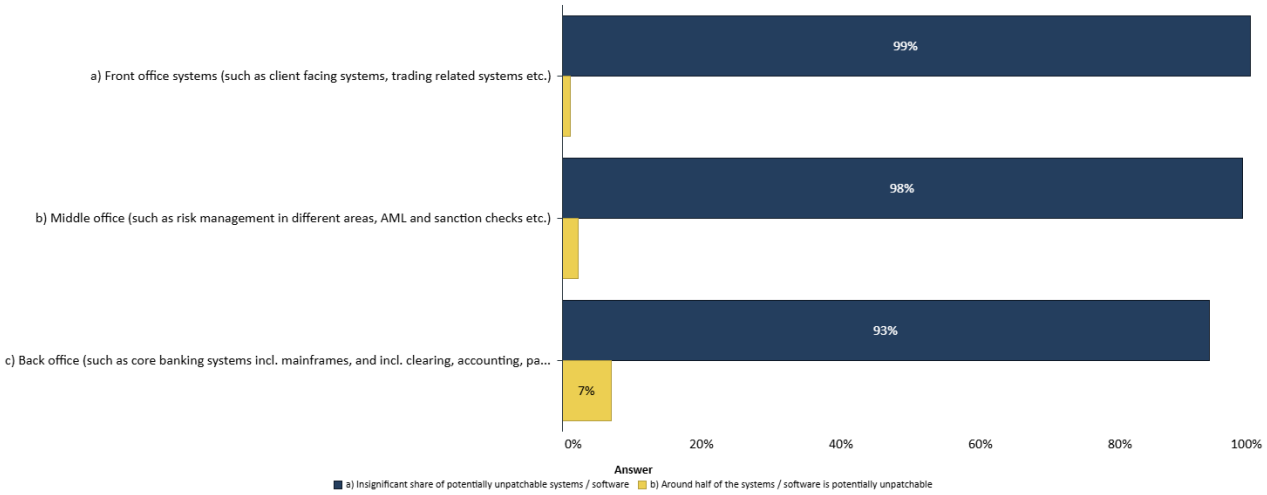
Question 26.1: Autumn 2026 results

Q26.1 If yes, which areas have been strengthened/modified?



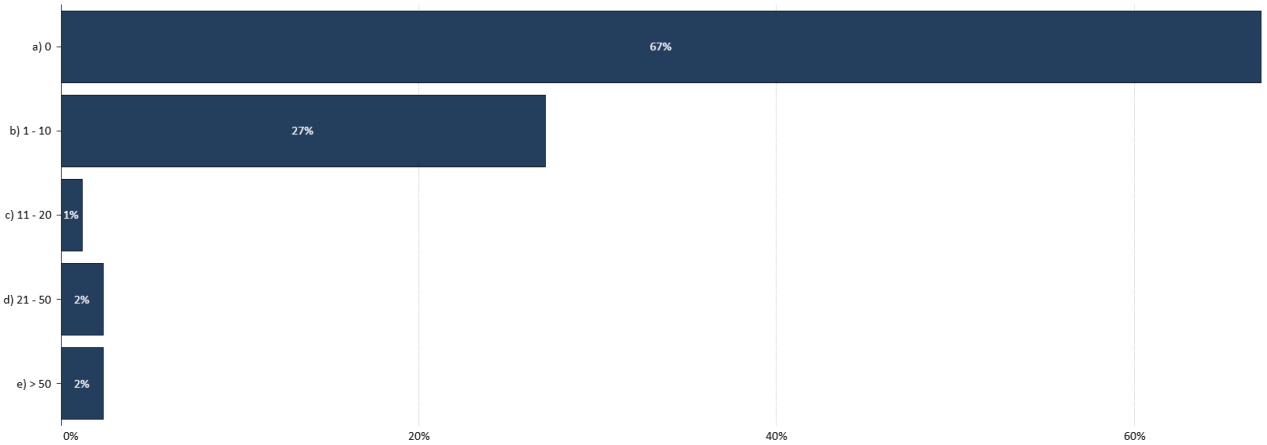
Question 27: Autumn 2026 results

Q27 Timely patching – here in the meaning of applying / using software updates / patches provided by software vendors – is a key measure to address rising cyber risks, not least amid rising risks from frontier AI models. What is the estimated share of “unpatchable” ICT systems / software in different areas (unpatchable meaning that these are e.g. self-built systems, or software incl. mainframes for which updates are no more provided and similar cases)?

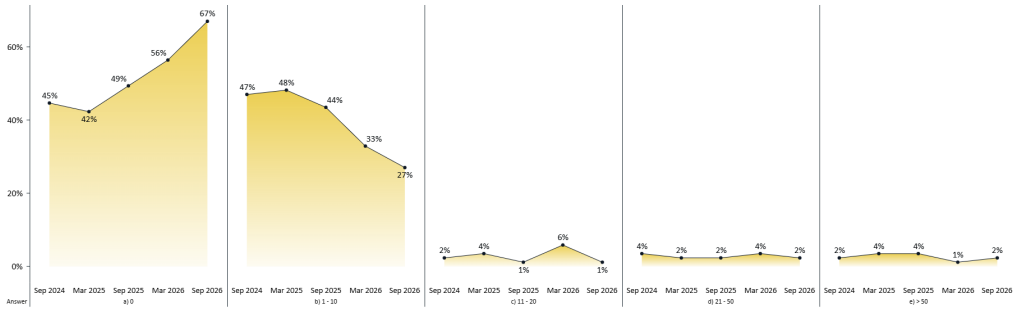


Question 28: Autumn 2026 results

Q28 How many cyber-attacks that resulted or could have potentially resulted in a "major ICT-related incident*" have you faced in the first half of 2026 (considering the highest level of consolidation)?

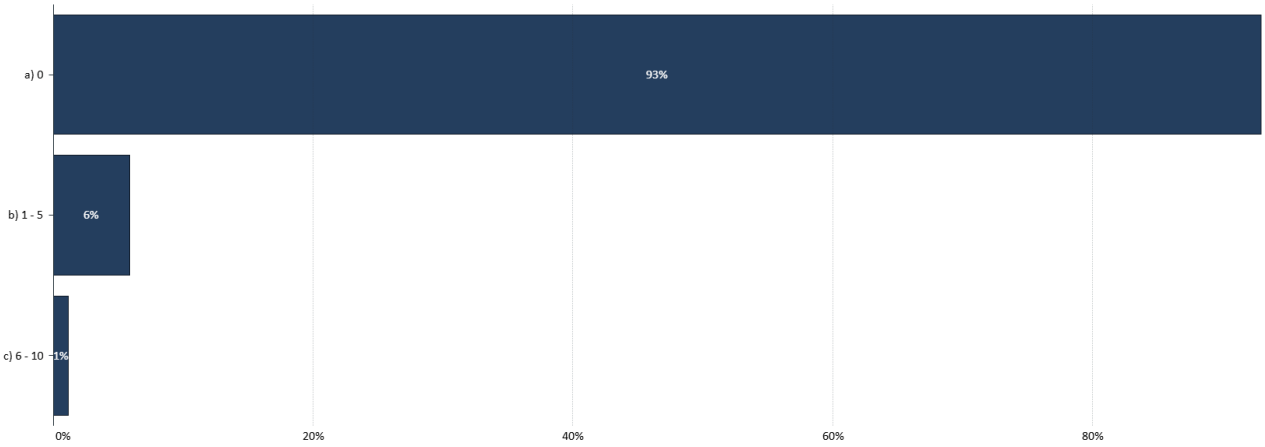


Question 28: comparison with earlier results

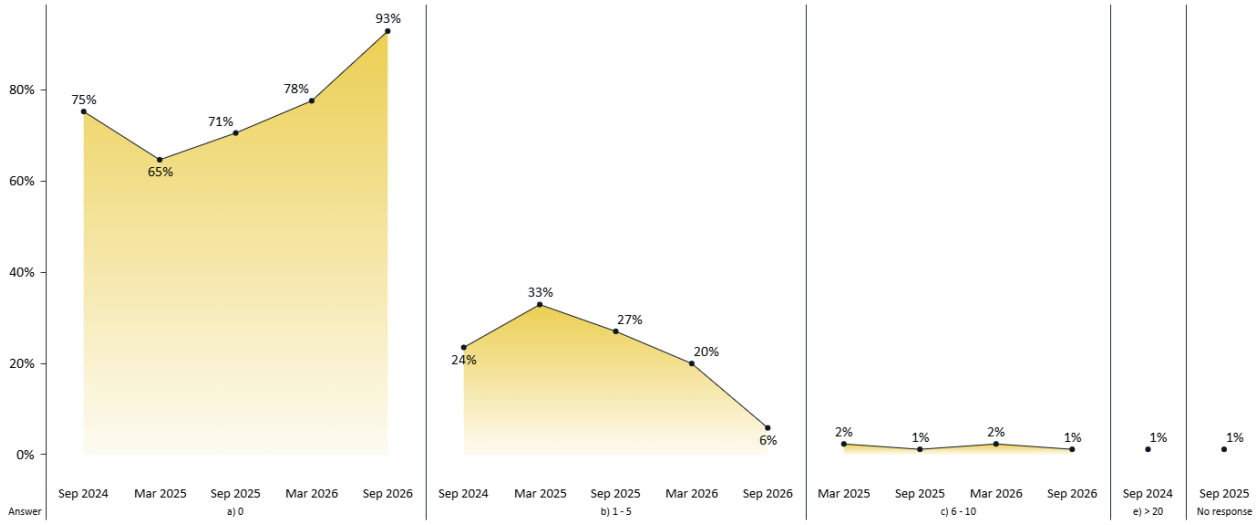


Question 29: Autumn 2026 results

Q29 How many successful cyber-attacks resulting in a "major ICT-related incident" have you faced in the first half of 2026 (considering the highest level of consolidation)?



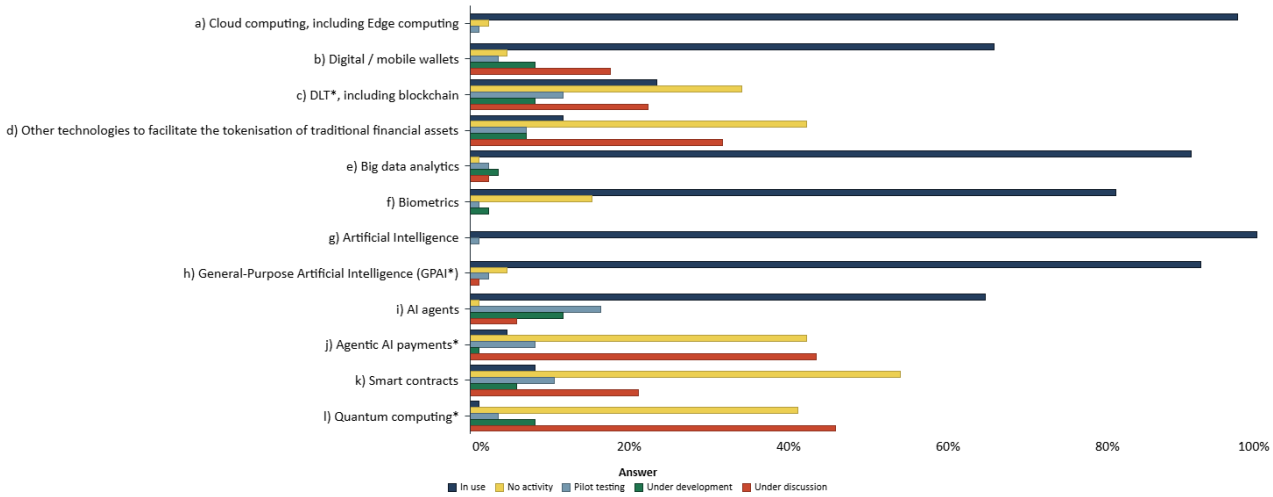
Question 29: comparison with earlier results



5. Financial Technology

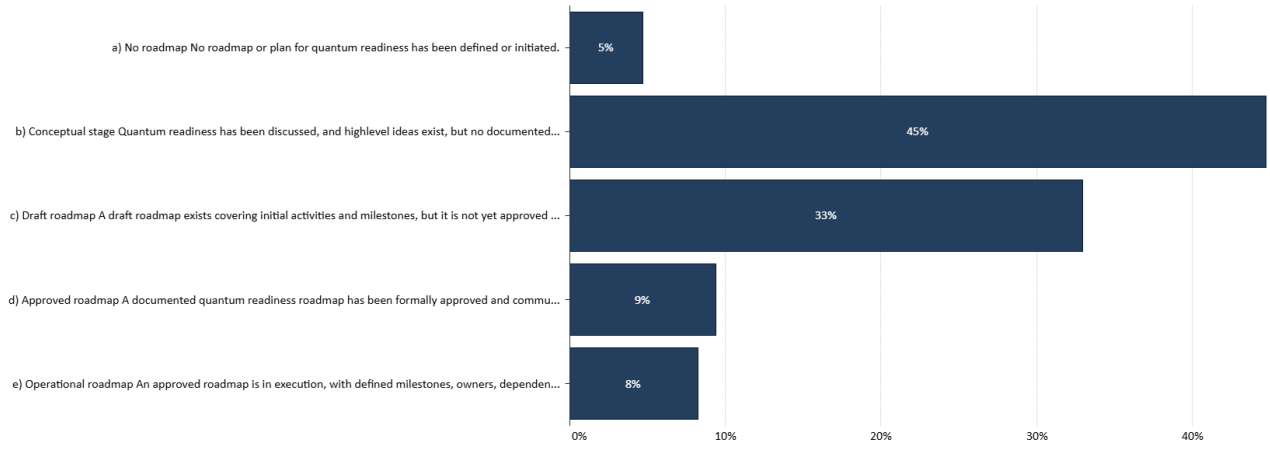
Question 30: Autumn 2026 results

Q30 What is the level of involvement of your institution with the application of the following technologies?



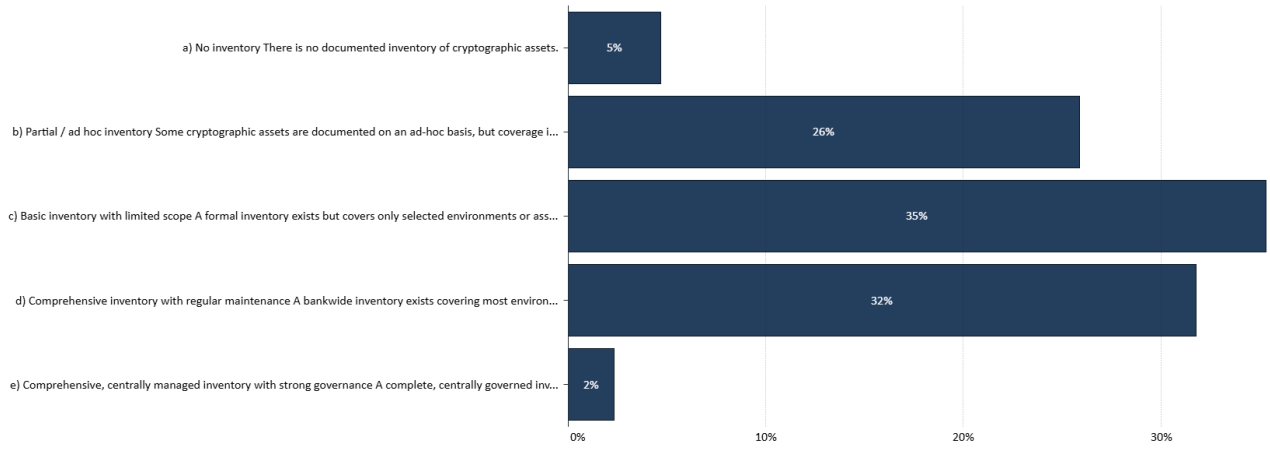
Question 31: Autumn 2026 results

Q31 What is the current status of your bank's internal Post-Quantum Cryptography (PQC*) migration roadmap for achieving quantum readiness?



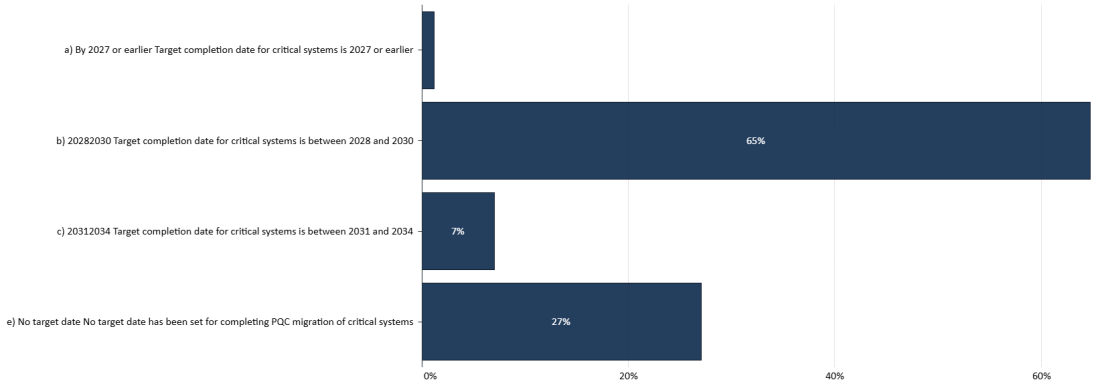
Question 32: Autumn 2026 results

Q32 Does your bank have an up-to-date cryptographic asset inventory (keys, certificates, secrets, libraries, and algorithms, including on-premises, cloud/SaaS, third-party)?



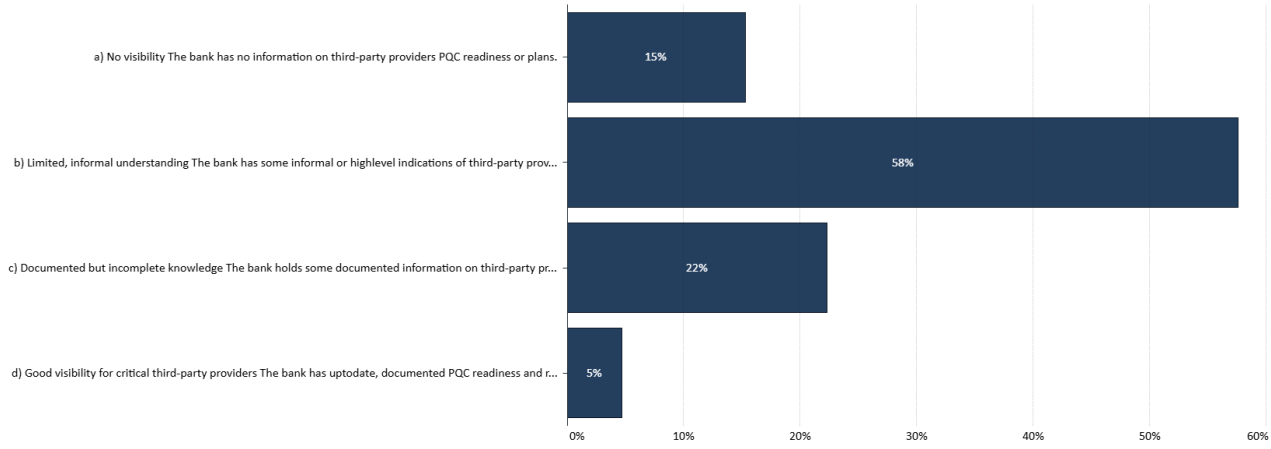
Question 33: Autumn 2026 results

Q33 What target does your bank consider for completing PQC migration of critical or high-risk?



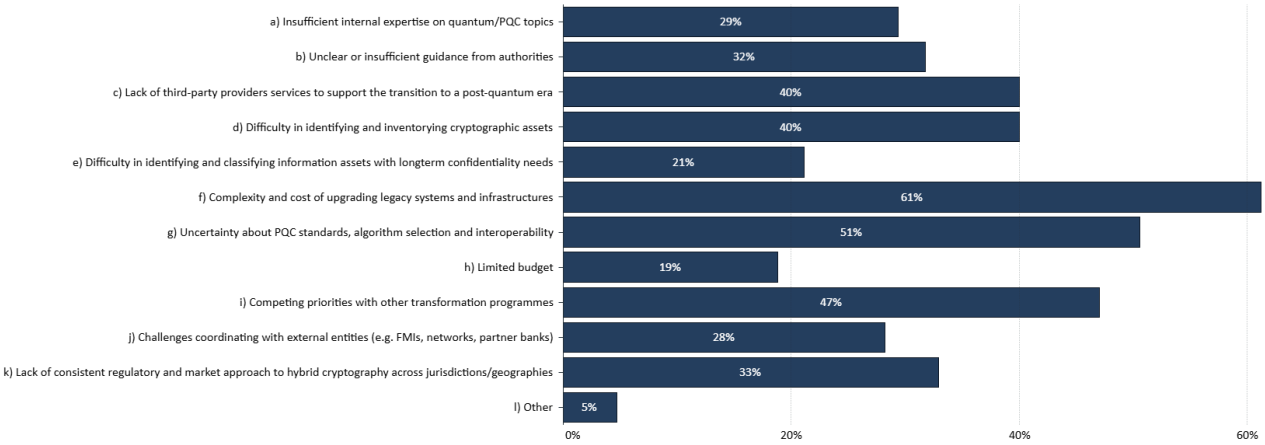
Question 34: Autumn 2026 results

Q34 What is the knowledge your bank has regarding your vendors' PQC readiness, roadmaps and timelines?



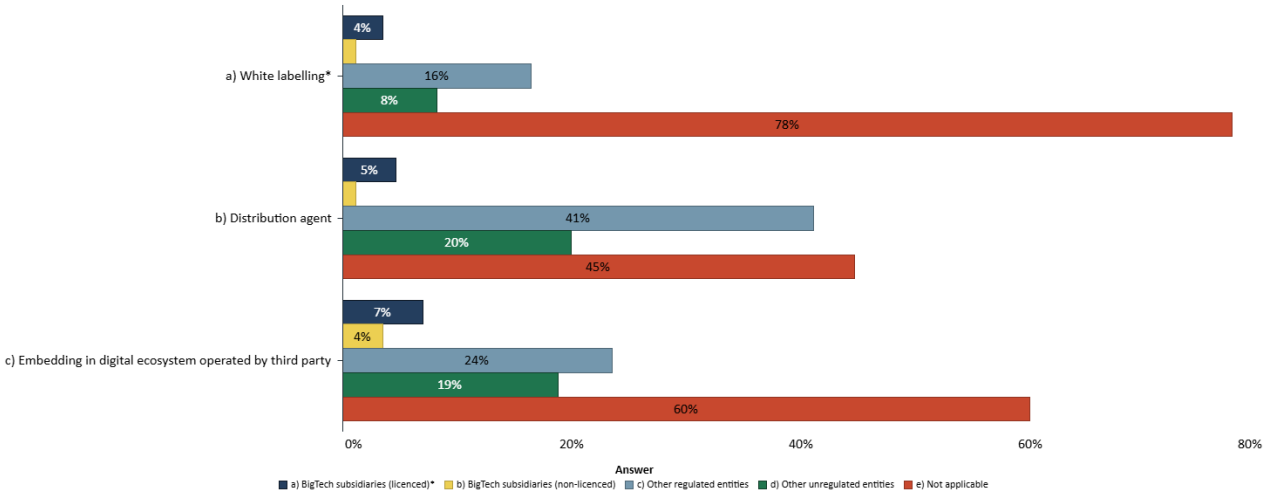
Question 35: Autumn 2026 results

Q35 What are the primary challenges faced by your bank to make progress with regards to quantum cryptography?



Question 36: Autumn 2026 results

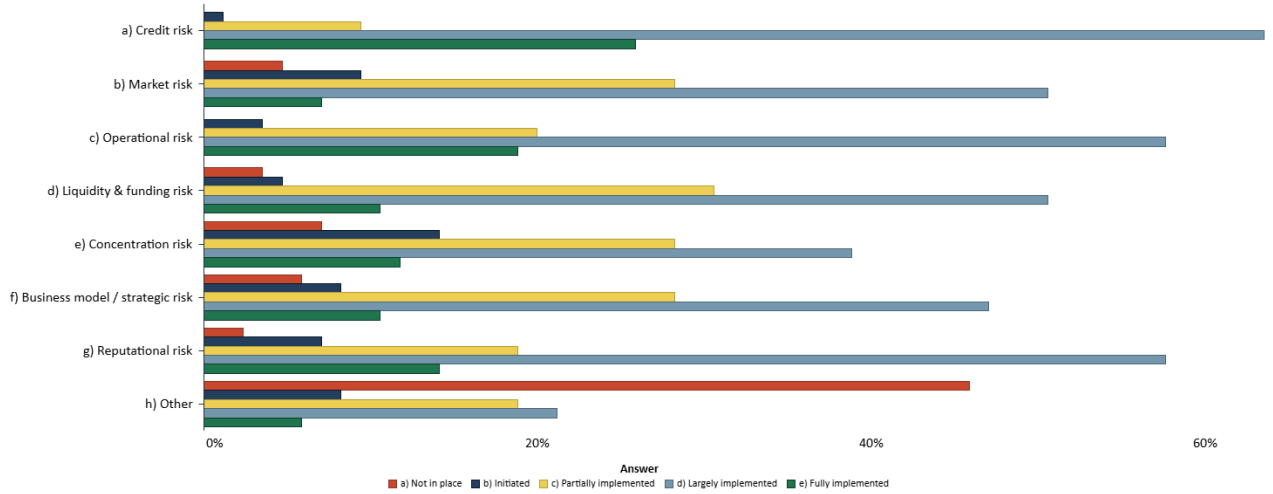
Q36 Have you entered into (or are you planning to enter in the next 12 months) any agreement with third parties to distribute your bank's financial services and products? If so, please indicate the type of third party with whom you are engaging.



6. Environmental Risk Management

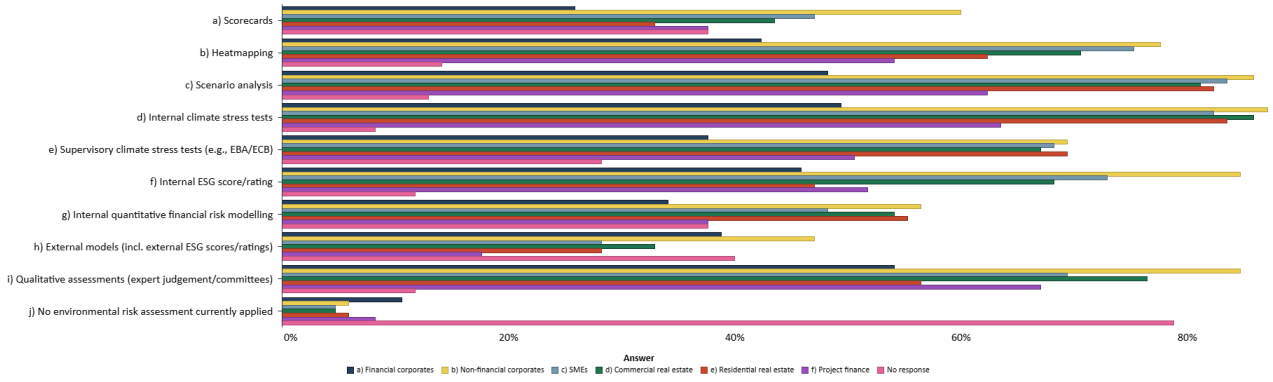
Question 37: Autumn 2026 results

Q37 How would you assess the maturity of integration of environmental factors in your institution' s risk management framework across the following risk types?



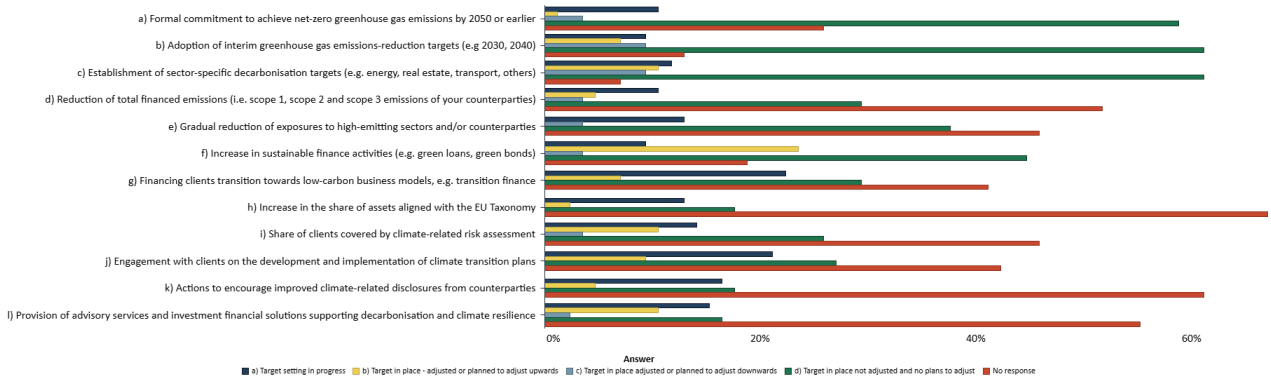
Question 38: Autumn 2026 results

Q38 Which methodological tools does your institution currently use to assess environmental risks across the following exposure classes?



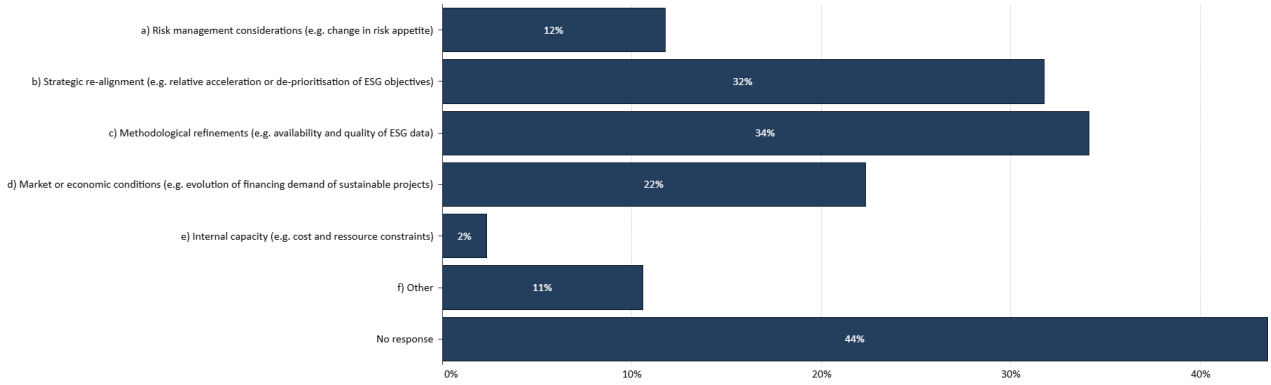
Question 39: Autumn 2026 results

Q39 For each of the following climate-related sustainability targets, please select the option that best describes its current status.



Question 40: Autumn 2026 results

Q40 What were the primary drivers for the recent or planned adjustments to your climate-related sustainability targets?



Annex: List of EU banks involved in RAQ

Financial Institution	Country
ABN AMRO Bank N.V.	Netherlands
AB SEB bankas	Latvia
AIB Group plc	Ireland
Alpha Bank S.A.	Greece
Arion Banki hf	Iceland
AS "SEB banka"	Latvia
AS LHV Group	Estonia
ASN Bank N.V.	Netherlands
Banca Comerciala Romana SA	Romania
Banca Monte dei Paschi di Siena S.p.A.	Italy
BANCA TRANSILVANIA	Romania
Banco Bilbao Vizcaya Argentaria, S.A.	Spain
BANCO BPM SOCIETA' PER AZIONI	Italy
Banco Comercial Português, SA	Portugal
Banco de Sabadell, S.A.	Spain
Banco Santander, S.A.	Spain
BANKINTER, S.A.	Spain
Bank of Cyprus Holdings Public Limited Company	Cyprus
Bank of Ireland Group plc	Ireland
Bank of Valletta Plc	Malta
Bank Polska Kasa Opieki S.A.	Poland
Banque et Caisse d'Epargne de l'Etat, Luxembourg	Luxembourg
Banque Internationale à Luxembourg	Luxembourg
BAWAG Group AG	Austria
Bayerische Landesbank	Germany
Belfius Bank	Belgium

Financial Institution	Country
BNP Paribas	France
BPER Banca S.p.A.	Italy
CAIXABANK, S.A.	Spain
Caixa Geral de Depósitos, S.A.	Portugal
Česká spořitelna, a.s.	Czechia
Československá obchodní banka, a.s.	Czechia
Citibank Europe plc	Ireland
COMMERZBANK Aktiengesellschaft	Germany
Confédération Nationale du Crédit Mutuel	France
Coöperatieve Rabobank U.A.	Netherlands
Crelan	Belgium
Danske Bank A/S	Denmark
DEUTSCHE BANK AKTIENGESELLSCHAFT	Germany
DNB Bank ASA	Norway
DSK Bank AD	Bulgaria
DZ BANK AG Deutsche Zentral-Genossenschaftsbank, Frankfurt am Main	Germany
Erste Group Bank AG	Austria
Eurobank Limited	Cyprus
Eurobank S.A.	Greece
First investment Bank AD	Bulgaria
Groupe BPCE	France
Groupe Crédit Agricole	France
HSBC Bank Malta p.l.c.	Malta
ICCREA BANCA S.P.A. - ISTITUTO CENTRALE DEL CREDITO COOPERATIVO	Italy
ING Groep N.V.	Netherlands
Intesa Sanpaolo S.p.A.	Italy
Jyske Bank A/S	Denmark

Financial Institution	Country
KBC Groupe	Belgium
Komerční banka, a.s.	Czechia
La Banque Postale	France
Landesbank Baden-Württemberg	Germany
Landesbank Hessen-Thüringen Girozentrale	Germany
Landsbankinn hf.	Iceland
Luminor Holding AS	Estonia
MBH bankcsoport	Hungary
National Bank of Greece, S.A.	Greece
Norddeutsche Landesbank - Girozentrale -	Germany
Nordea Bank Abp	Finland
Nova Ljubljanska Banka d.d., Ljubljana	Slovenia
Nykredit Realkredit A/S	Denmark
OP Osuuskunta	Finland
OTP-csoport	Hungary
OTP Luxembourg S.A.R.L.	Luxembourg
PIRAEUS BANK SA	Greece
Powszechna Kasa Oszczednosci Bank Polski S.A.	Poland
Privredna Banka Zagreb d.d.	Croatia
Raiffeisen Bank International AG	Austria
Revolut Holdings Europe UAB	Lithuania
Skandinaviska Enskilda Banken - gruppen	Sweden
Slovenská sporiteľňa, a.s.	Slovakia
Société générale S.A.	France
SpareBank 1 Sør-Norge	Norway
Svenska Handelsbanken - gruppen	Sweden
Swedbank Baltics AS	Latvia
Swedbank – Grupp	Sweden
Unicaja Banco, S.A.	Spain

Financial Institution	Country
UNICREDIT, SOCIETA' PER AZIONI	Italy
Všeobecná úverová banka, a.s.	Slovakia
Zagrebačka banka d.d.	Croatia

Appendix: Autumn 2026

Business model, Strategy and Profitability

* **Q1 How do you expect your institution's return on equity (ROE*) to evolve over the next 6 to 12 months?**

- a) Increasingly significantly (by 2 percentage points or more)
- b) Increase moderately (by less than 2 percentage points)
- c) Remain broadly stable (change within +/- 0.5 percentage points)
- d) Decrease moderately (by less than 2 percentage points)
- e) Decrease significantly (by 2 percentage points or more)
- f) Don't know / No opinion

Q2 Which areas are you primarily targeting to increase the profitability of your bank in the next 6 to 12 months? (Rank according to priority with 1 - High Priority and 4 - Low Priority)

	1	2	3	4	Not Applicable
* a) Net interest income					
* b) Net fee and commission income					
* c) Other operating income					
* d) Operating expenses / costs reduction					
* e) Impairments					
* f) Other					

* **Q3 What is your estimated Cost of Equity*?**

- a) < 6%
- b) ≥ 6% and < 8%
- c) ≥ 8% and < 10%
- d) ≥ 10% and < 12%
- e) ≥ 12%

* **Q4 Which measures are you primarily taking to reduce operating expenses / costs?**

maximum 3 selection(s)

- a) Overhead and staff costs reduction
- b) Outsourcing
- c) Off-shoring or near-shoring
- d) Reducing business activities (business lines and locations, incl. branches)
- e) Increasing automatisation and digitalization
- f) Artificial Intelligence usage

- [ ] g) Other

* **Q5 Taking into account both the opportunities and threats (risks) associated with Artificial Intelligence (AI*), how would you assess its expected overall impact on your bank over the next 3-5 years? Weighing both opportunities (such as revenue rises, cost reduction, etc.), and threats (e.g. rising competition in some areas, cyber related threats etc.)?**

- [ ] a) Overall a rather positive impact
- [ ] b) Overall a rather negative impact
- [ ] c) Overall a balanced impact (opportunities and threats are expected to offset each other)

* **Q6 What net impact do you expect AI to have on your bank's operating expenses (including personnel costs and AI related costs such as model usage inl. token based cost models, infrastructure and specialist staff)?**

- [ ] a) Overall reduction in operating expenses
- [ ] b) No major impact on a net basis
- [ ] c) Negative impact
- [ ] d) No major impact because we only plan a limited AI usage

* **Q7 In which areas would you expect the most positive impact from AI usage in your bank going forward?**

Minimum 1 selection(s)

- [ ] a) Higher employee productivity
- [ ] b) Faster customer onboarding and servicing (e.g. AML checks*, sanction compliance, credit assessment)
- [ ] c) Improved ongoing risk management
- [ ] d) Improved fraud detection and prevention
- [ ] e) Higher revenues
- [ ] f) We only expect limited AI usage

* **Q8 Are you considering M&A transactions with/of?**

maximum 2 selection(s)

- [ ] a) Domestic business units
- [ ] b) Domestic portfolios
- [ ] c) Domestic credit institutions
- [ ] d) Credit institutions, business units and/or portfolios in other EU/EEA countries
- [ ] e) Credit institutions, business units and/or portfolios from outside the EU/EEA
- [ ] f) FinTech* firms (domestic or foreign)
- [ ] g) Non-bank financial service providers
- [ ] h) We are not considering M&A transactions

* **Q9 What is the main obstacle to expanding your business into other EU/EEA countries?**

maximum 2 selection(s)

- [ ] a) Regulatory/supervisory concerns
- [ ] b) Tax related challenges
- [ ] c) Challenges related to different aspects of the legal systems (e.g. insolvency law, etc.)
- [ ] d) Product specificities (e.g. need to materially adjust conditions of certain products, such as fixed vs. variable rate mortgages)

- e) Limited efficiencies (no major synergies possible, rather dis-synergies)
- f) Strong domestic focus of current business model / strategy
- g) Operational complexity (incl. ICT related challenges)
- h) Funding constraints (e.g. concerns of limited market-based funding if new deposits do not suffice for expansion)
- i) No intention to expand
- j) Other

Funding and Liquidity

*** Q10 Which funding instruments does your institution expect to issue or make greater use of over the next 12 months?**

Maximum 3 selection(s)

- a) Preferred senior unsecured
- b) Senior non-preferred / Senior HoldCo*
- c) Subordinated debt including AT1/T2
- d) Secured (covered bonds)
- e) Securitisations
- f) Wholesale deposits
- g) Retail deposits
- h) Central bank funding
- i) Short-term interbank
- j) CET1 instruments
- k) Not applicable

Q11 Over the next 12 months, what are your expectations regarding cost trends (i.e., spreads) for your bank across the following funding sources? Please consider the overall expected direction during the 12-month period, regardless of any interim volatility.

	a) Increase	b) Decrease	c) Stable	d) No Opinion / not relevant
* a) Preferred senior unsecured				
* b) Senior non-preferred / Senior HoldCo*				
* c) Subordinated debt including AT1/T2				
* d) Secured (e.g covered bonds)				

*** Q12 What is the primary driver of your expected funding strategy over the next 12 months?**

Maximum 3 selection(s)

- a) Asset-liability management (ALM*) considerations
- b) Adjusting the funding structure (including attaining more deposits to optimize funding costs and/or diversifying funding sources)

- [ ] c) Meeting MREL/TLAC requirements
- [ ] d) Refinancing maturing liabilities
- [ ] e) Supporting loan growth
- [ ] f) Increasing liquidity buffers
- [ ] g) Possible change in market conditions going forward
- [ ] h) Other

Asset composition and quality

Q13 Which portfolios do you plan to increase/decrease in in volume during next 12 months (on a net basis)?

	a) Increase	b) Decrease	c) Stable	d) No Opinion
* a) CRE*				
* b) SME*				
* c) Residential Mortgage				
* d) Consumer Credit				
* e) Large Corporates*				
* f) Trading				
* g) Structured Finance				
* h) Sovereign and institutions				
* i) Project Finance				
* j) Asset Finance*				
* k) Other				

Q14 How would you assess loan demand during the next 12 months across the following corporate and household sectors?

	a) Increase	b) Stable	c) Decrease	d) N/A
* a) Manufacturing & Industrial				
* b) Construction & Real Estate				
* c) Energy & Utilities				
* d) Technology & Telecommunications				
* e) Transport & Logistics				

* f) Retail & Wholesale Trade				
* g) Financial and insurance				
* h) Security and Defense				
* i) Other Corporate Sectors				
* j) Mortgages				
* k) Consumer credit				

Q15 How have the following factors affected (over the last 6 months) demand for corporate loans?

	a) Positively	b) Negatively	c) No or immaterial impact
* a) Overall economic conditions and expectations (business cycle)			
* b) Interest rate levels			
* c) Sector specific investments			
* d) Regulatory changes			
* e) ESG* related considerations			
* f) Supply chain shifts			
* g) Government guarantees			
* h) Consumer confidence			
* i) Real estate dynamics			
* j) Input cost pressures			
* k) Tightening credit standards			

Q16 How have the following factors currently affected (over the last 6 months) demand for household loans?

	a) Positively	b) Negatively	c) No or immaterial impact
* a) Interest rate levels			
* b) Consumer confidence			
* c) Real estate dynamics			

* d) Inflation pressures			
* e) Fiscal incentives			
* f) Tightening credit standards			
* g) ESG*-linked borrowing			

*** Q17 How do you expect the developments (including performance) of private credit markets to affect your institution over the next two years?**

Maximum 2 selection(s)

- a) Increased competition for lending
- b) Partnership opportunities (such as partnering with private credit funds in providing lending to clients)
- c) Distribution opportunities (e.g. selling shares in private credit fund shares to clients for fee generation and similar)
- d) Expansion of lending to private credit funds and similar entities
- e) Private credit funds and similar entities as source for funding
- f) Increased credit risk arising from exposures to private credit (e.g. lending to private credit funds or parallel/co-lending to the same borrowers as private credit funds)

Q18 Which portfolios do you expect to improve/deteriorate in asset quality in the next 12 months?

	a) Improve	b) Deteriorate	c) Stable	d) No Opinion
* a) CRE*				
* b) SME*				
* c) Residential Mortgage				
* d) Consumer Credit				
* e) Large Corporates*				
* f) Trading				
* g) Structured Finance				
* h) Sovereign and institutions				
* i) Project Finance				
* j) Asset Finance*				
* k) Other				

* **Q19 What is your Cost of Risk* estimation for the current financial year?**

- a) < 0bp
- b) ≥ 0 and < 25bp
- c) ≥ 25 and < 50bp
- d) ≥ 50 and < 75bp
- e) ≥ 75 and < 100bp
- f) ≥ 100 and < 200bp
- g) ≥ 200bp

* **Q20 If you have any management provisioning overlays in place, which factors are they primarily intended to address?**

Maximum 3 selection(s)

- a) Model limitations, deficiencies or pending model updates
- b) Macroeconomic uncertainty (e.g. Inflation, interest rates, growth outlook)
- c) Climate related physical risks
- d) Climate related transition risks
- e) Other ESG* related risks
- f) Political and geopolitical uncertainty
- g) Sectoral and/or geographic concentration risks
- h) Portfolio dynamics, including aging of non-performing loans
- i) Other factors (please specify)
- j) No overlays in place

Q20a If selected i) Other factors, please specify what these factors are

* **Q19 Which is the proportion of the total ECL (expected credit loss) amount that is recognized via provisioning overlays?**

- a) 0%
- b) ≥ 0% and < 10%
- c) ≥ 10% and < 20%
- d) ≥ 20% and < 30%
- e) ≥ 30% and < 40%
- f) ≥ 40%

Conduct, Reputational and Operational Risk

***Q22 Over the past three years, how much has your firm paid out in the form of compensation, redress, litigation and similar payments (as percentage of equity*)?**

- a) ≥ 0% and <0,25%
- b) ≥ 0,25% and <0,5%
- c) ≥ 0,5% and <1%
- c) ≥ 1% and <2%
- d) ≥ 2% and <3%
- e) ≥ 3% and <4%
- f) ≥ 4%

***Q23 Which are the main drivers of operational risk?**

Maximum 3 selection(s)

- a) Cyber risk* and data security
- b) IT failures
- c) Outsourcing
- d) Regulatory initiatives
- e) Conduct and legal risk
- f) Organisational change
- g) Money Laundering and Terrorism Financing
- h) Risk of non compliance with applicable restrictive measures regimes (financial sanctions)
- i) Fraud
- j) Climate and environmental risk
- k) Other

*** Q24 What are the main drivers of fraud risk?**

Maximum 2 selection(s)

- a) Internal fraud
- b) Fraudulent activities via external service providers
- c) Increased reliance on remote and online services
- d) Online and cyber-fraudulent activities
- e) Terrorist financing activities
- f) Payment fraud
- g) Theft/breach of customer credentials and social engineering
- h) Fraud by using AI
- i) Other

*** Q25 Have you gained access to and/or are you making use of so-called latest versions of frontier AI* models (including but not limited to Mythos, Opus 4.7, GPT-5.6 and Gemini 3.1 Pro)?**

- ☐ a) Yes
- ☐ b) No

*** Q25.1 Do you use AI models for detection and remediation of software flaws, system weaknesses and similar?**

- ☐ a) Yes
- ☐ b) No

*** Q25.2 From which geographical regions do you primarily source the AI models used by your institution?**

Please consider your best available estimate based on the relative importance or extent of use of AI models within your institution. "Geographical region" refers to the domicile of the primary provider or developer of the AI model (rather than the location where the model is hosted or deployed)

- ☐ a) Europe
- ☐ b) United States
- ☐ c) China
- ☐ d) Other countries

*** Q26 Have recent developments in the cyber threat landscape, including AI-enabled cyber threats, led your institution to modify its cybersecurity* strategy or controls?**

- ☐ a) Yes, significantly
- ☐ b) Yes, to some extent
- ☐ c) No
- ☐ d) Too early to assess

*** Q26.1 If yes, which areas have been strengthened/modified?**

Maximum 3 selection(s)

- ☐ a) Changes to the governance framework on ICT* security risks
- ☐ b) Security of AI systems* and applications
- ☐ c) Monitoring and detection capabilities (including AI-assisted detection)
- ☐ d) Identify and access management (e.g multi-factor authentication, privileged access controls)
- ☐ e) Vulnerability management (e.g. fester identification and remediation of vulnerabilities)
- ☐ f) Third-party and software supply chain risk management
- ☐ g) Security testing (e.g. penetration testing or cyber attack exercises/red teaming)
- ☐ h) Employee awareness and cyber security training
- ☐ i) Incident response and recovery capabilities
- ☐ j) Other

Q27 Timely patching – here in the meaning of applying / using software updates / patches provided by software vendors – is a key measure to address rising cyber risks, not least amid rising risks from frontier AI models. What is the estimated share of "unpatchable" ICT systems / software in different areas (unpatchable meaning that these are e.g. self-built systems, or software incl. mainframes for which updates are no more provided and similar cases)?

	a) Insignificant share of potentially unpatchable systems / software	b) Around half of the systems / software is potentially unpatchable	c) Significant share of potentially unpatchable systems / software
* a) Front office systems (such as client facing systems, trading related systems etc.)	○	○	○
* b) Middle office (such as risk management in different areas, AML and sanction checks etc.)	○	○	○
* c) Back office (such as core banking systems incl. mainframes, and incl. clearing, accounting, payroll etc.)	○	○	○

***Q28 How many cyber-attacks that resulted or could have potentially resulted in a "major ICT-related incident" have you faced in the first half of 2026 (considering the highest level of consolidation)?**

- ○ a) 0
- ○ b) 1 - 10
- ○ c) 11 - 20
- ○ d) 21 - 50
- ○ e) > 50

***Q29 How many cyber-attacks that resulted or could have potentially resulted in a "major ICT-related incident"* have you faced in the first half of 2026 (considering the highest level of consolidation)?**

- ○ a) 0
- ○ b) 1 - 5
- ○ c) 6 - 10
- ○ d) 11 - 20
- ○ e) > 20

Financial Technology

Q30 What is the level of involvement of your institution with the application of the following technologies?

	a) Supervised learning	b) Reinforcement learning	c) Unsupervised learning	d) Deep Learning	e) Agentic AI
* a) Cloud computing, including Edge computing					
* b) Digital / mobile wallets					
* c) DLT*, including blockchain					
* d) Other technologies to facilitate the tokenisation of traditional financial assets					
* e) Big data analytics					
* f) Biometrics					
* g) Artificial Intelligence					
* h) General-Purpose Artificial Intelligence (GPAI*)					
* i) AI agents					

* j) Agentic AI payments*					
* k) Smart contracts					
* l) Quantum computing*					

*** Q31 What is the current status of your bank's internal Post-Quantum Cryptography (PQC*) migration roadmap for achieving quantum readiness?**

- a) No roadmap - No roadmap or plan for quantum readiness has been defined or initiated
- b) Conceptual stage - Quantum readiness has been discussed, and high-level ideas exist, but no documented roadmap.
- c) Draft roadmap - A draft roadmap exists covering initial activities and milestones, but it is not yet approved or fully detailed.
- d) Approved roadmap - A documented quantum readiness roadmap has been formally approved and communicated internally.
- e) Operational roadmap – An approved roadmap is in execution, with defined milestones, owners, dependencies, and regular progress tracking.

*** Q32 Does your bank have an up-to-date cryptographic asset inventory (keys, certificates, secrets, libraries, and algorithms, including on-premises, cloud/SaaS, third-party)?**

- a) No inventory – There is no documented inventory of cryptographic assets.
- b) Partial / ad hoc inventory – Some cryptographic assets are documented on an ad-hoc basis, but coverage is incomplete and not maintained systematically.
- c) Basic inventory with limited scope – A formal inventory exists but covers only selected environments or asset types and is not consistently updated.
- d) Comprehensive inventory with regular maintenance – A bank-wide inventory exists covering most environments and asset types, with defined maintenance procedures and periodic updates.
- e) Comprehensive, centrally managed inventory with strong governance – A complete, centrally governed inventory covers all environments (including third parties), is integrated with configuration/asset management processes, and is kept up to date in near-real time

*** Q33 What target does your bank consider for completing PQC migration of critical or high-risk?**

- a) By 2027 or earlier – Target completion date for critical systems is 2027 or earlier.
- b) 2028-2030 – Target completion date for critical systems is between 2028 and 2030
- c) 2031-2034 – Target completion date for critical systems is between 2031 and 2034
- d) 2035 or later – Target completion date for critical systems is 2035 or later
- e) No target date – No target date has been set for completing PQC migration of critical systems

*** Q34 What is the knowledge your bank has regarding your vendors' PQC readiness, roadmaps and timelines?**

- a) No visibility – The bank has no information on third-party providers' PQC readiness or plans
- b) Limited, informal understanding – The bank has some informal or high-level indications of third-party providers' PQC intentions, but no documented roadmaps
- c) Documented but incomplete knowledge – The bank holds some documented information on third-party providers' PQC roadmaps and timelines, but coverage is partial or not regularly updated
- d) Good visibility for critical third-party providers'- The bank has up-to-date, documented PQC readiness and roadmap information for its main critical third-party providers
- e) Comprehensive and regularly updated view – The bank maintains a consolidated, regularly updated view of PQC readiness, roadmaps, and timelines across all relevant third-party providers, integrated into its own planning

*** Q35 What are the primary challenges faced by your bank to make progress with regards to quantum cryptography? (select all the answers that apply)**

- [ ] a) Insufficient internal expertise on quantum/PQC topics
- [ ] b) Unclear or insufficient guidance from authorities

- c) Lack of third-party providers' services to support the transition to a post-quantum era
- d) Difficulty in identifying and inventorying cryptographic assets
- e) Difficulty in identifying and classifying information assets with long-term confidentiality needs
- f) Complexity and cost of upgrading legacy systems and infrastructures
- g) Uncertainty about PQC standards, algorithm selection and interoperability
- h) Limited budget
- i) Competing priorities with other transformation programs
- j) Challenges coordinating with external entities (e.g. FMIs, networks, partner banks)
- k) Lack of consistent regulatory and market approach to hybrid cryptography across jurisdictions/geographies
- l) Other

Q36 Have you entered into (or are you planning to enter in the next 12 months) any agreement with third parties to distribute your bank's financial services and products? If so, please indicate the type of third party with whom you are engaging. (select all the answers that apply)

	a) BigTech subsidiaries (licenced)*	b) BigTech subsidiaries (non-licenced)	c) Other regulated entities	d) Other unregulated entities	e) Not applicable
* a) White labelling*					
* b) Distribution agent					
* c) Embedding in digital ecosystem operated by third party					

Environmental risk management

Q32 How would you assess the maturity of integration of environmental factors in your institution' s risk management framework across the following risk types?

Please select the option that best reflects your institution's current level of implementation across the risk management processes.

Maturity levels:

- **Not in place** – No structured integration of environmental factors
- **Initiated** – Early exploration; environmental factors acknowledged but not yet embedded
- **Partially implemented** – Initial risk management processes in place with selective, partial application
- **Largely implemented** – Broad, systematic integration across most relevant risk management processes
- **Fully implemented** – Environmental factors fully embedded and consistently applied across all risk management processes

Risk type	a) Not in place	b) Initiated	c) Partially implemented	d) Largely implemented	e) Fully implemented
* a) Credit risk					
* b) Market risk					
* c) Operational risk					
* d) Liquidity & funding risk					
* e) Concentration risk					
* f) Business model / strategic risk					
* g) Reputational risk					
* h) Other					

Q33 Which methodological tools does your institution currently use to assess environmental risks across the following exposure classes?

Methodological tools	a) Financial corporates	b)Non-financial corporates	c) SMEs*	d) Commercial real estate	e) Residential real estate	f) Project finance
a) Scorecards						
b) Heatmapping						
c) Scenario analysis						
d) Internal climate stress tests						
e) Supervisory climate stress tests (e.g., EBA/ECB)						
f) Internal ESG* score /rating						

g) Internal quantitative financial risk modelling	☐	☐	☐	☐	☐	☐
h) External models (incl. external ESG scores/ratings)	☐	☐	☐	☐	☐	☐
i) Qualitative assessments (expert judgement /committees)	☐	☐	☐	☐	☐	☐
j) No environmental risk assessment currently applied	☐	☐	☐	☐	☐	☐

Q39 For each of the following climate-related sustainability targets, please select the option that best describes its current status.

Please complete this question only for targets that are currently in place or planned to be established. Leave all columns blank where your institution does not have such a target.

- **Target setting in progress:** Target currently being developed, but not yet in place
- **Target in place – adjusted or planned to adjust upwards:** Target adjusted upwards within the past 12 months or planned to be adjusted upwards within the next 12 months
- **Target in place – adjusted or planned to adjust downwards:** Target adjusted downwards within the past 12 months or planned to be adjusted downwards within the next 12 months
- **Target in place – not adjusted and no plans to adjust:** No adjustment of the target within the past 12 months or no adjustment planned within the next 12 months

	a) Target setting in progress	b) Target in place – adjusted or planned to adjust - upwards	c) Target in place – adjusted or planned to adjust - downwards	d) Target in place – not adjusted and no plans to adjust
a) Formal commitment to achieve net-zero greenhouse gas emissions by 2050 or earlier	☐	☐	☐	☐
b) Adoption of interim greenhouse gas emissions-reduction targets (e.g 2030, 2040)	☐	☐	☐	☐

c) Establishment of sector-specific decarbonisation targets (e.g. energy, real estate, transport, others)	☐	☐	☐	☐
d) Reduction of total financed emissions (i.e. scope 1, scope 2 and scope 3 emissions of your counterparties)	☐	☐	☐	☐
e) Gradual reduction of exposures to high-emitting sectors and/or counterparties	☐	☐	☐	☐
f) Increase in sustainable finance activities (e.g. green loans, green bonds)	☐	☐	☐	☐
g) Financing clients' transition towards low-carbon business models, e.g. transition finance	☐	☐	☐	☐
h) Increase in the share of assets aligned with the EU Taxonomy	☐	☐	☐	☐
i) Share of clients covered by climate-related risk assessment	☐	☐	☐	☐
j) Engagement with clients on the development and implementation of climate transition plans	☐	☐	☐	☐
k) Actions to encourage improved climate-related disclosures from counterparties	☐	☐	☐	☐
l) Provision of advisory services and investment financial solutions supporting decarbonisation and climate resilience	☐	☐	☐	☐

*** Q40 What were the primary drivers for the recent or planned adjustments to your climate-related sustainability targets? (Please select all that apply)**

- ☐ a) Risk management considerations (e.g. change in risk appetite)
- ☐ b) Strategic re-alignment (e.g. relative acceleration or de-prioritization of ESG objectives)
- ☐ c) Methodological refinements (e.g. availability and quality of ESG data)
- ☐ d) Market or economic conditions (e.g. evolution of financing demand of sustainable projects)

- ☐ e) Internal capacity (e.g. cost and resource constraints)
- ☐ f) Other

Glossary

Term	Definition/Explanation
Agentic AI Payments	Financial transactions initiated managed and executed autonomously by an artificial intelligence system, with limited or no human intervention
AI	Artificial Intelligence
AI system	A machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.
ALM	Asset Liability Management
AML check	Process used to verify customer identities, assess money laundering and terrorist financing risks, and comply with anti-money laundering and counter-terrorist financing requirements.
Alternative Investment Fund (AIF)	Collective investment undertaking as defined under the Alternative Investment Fund Managers Directive (AIFMD).
Asset Finance	Financing of tangible assets, including, for example, ships, aircraft, machinery, vehicles and industrial equipment.
AT1	Additional Tier 1
AT2	Additional Tier 2
BigTech	Large technology companies providing digital platforms or technology-enabled financial services, either directly or through subsidiaries.
BigTech subsidiary (licensed)	A subsidiary of a BigTech company authorised to provide regulated financial services.
Business Development Company (BDC)	A publicly listed investment company that provides debt and equity financing primarily to private companies (mainly relevant in the US market)
CCP	Central Counterparty. An entity that interposes itself between counterparties to financial transactions and becomes the buyer to every seller and the seller to every buyer.
CET1	Common Equity Tier 1

CoE	Cost of Equity refers to the minimum rate of return required by equity investors for providing capital to the bank, reflecting the compensation expected for the risks holding its equity
Cost of Risk	Impairment charges (change in allowances and provisions) as a ratio of average gross loans and advances
Covered Bond	Debt security backed by a dedicated pool of high-quality assets while remaining on the issuer's balance sheet.
CRE	Commercial Real Estate (including officem retail, industrial, logistics, hospitality and real estate development exposures)
Cyber risk	Potential for loss or harm caused by failures in an organisation’s digital systems due to cyber threats
Cyber security	Set of practices, technologies, and processes designed to protect computer systems, networks, and data from unauthorized access, attacks, damage, or theft. It encompasses tools like firewalls, encryption, and threat monitoring, as well as organizational measures such as policies and user training, all aimed at ensuring the confidentiality, integrity, and availability of digital information.
Distribution agent	An arrangement whereby a third party distributes a bank's products or services under the bank's own brand
DLT	Distributed Ledger Technology
ECL	Expected Credit Loss
Embedded finance / Digital ecosystem	Provision of financial products and services through non-financial digital platforms integrated into customers' digital journeys.
Equity	As defined under the applicable accouning framework
ESG	Environmental, Social and Governance
FinTech	Technologically enabled financial innovation that could result in new business models, applications, processes, or products with an associated material effect on financial markets and institutions and the provision of financial services’ (Financial Stability Board)
Frontier AI	The most advanced general purpose AI models available at a given point in time, trained on very large datasets and capbable of performing a broad range of complex tasks
GPAI	An AI system based on a general-purpose AI model, such as LLMs, and which has the capability to serve a variety of purposes, both for direct use as well as for integration in other AI systems
ICT	Information and Communication Technology (ICT), including software, networks and communication systems used to collect, process, store and exchange information

IFRS 9 Stage 1, 2 and 3	Short definitions of the impairment stages.
Large Corporates	Non-financial corporates other than small medium-sized enterprises and Commercial Real Estate entities
Management provisioning overlay	Additional provisions recognised outside model-generated ECL estimates to capture risks not adequately reflected in existing impairment models.
M&A	Mergers & Acquisitions
Major ICT-related incident	An ICT-related incident that has a high adverse impact on the network and information systems that support critical or important functions of the financial entity (Article 3(10) of Regulation (EU) 2022/2554 on digital operational resilience for the financial sector)
Money Market Fund (MMF)	Collective investment undertaking investing primarily in short-term money market instruments.
MREL	Minimum Requirement for Own Funds and Eligible Liabilities
Preferred senior unsecured debt	Senior unsecured debt ranking above senior non-preferred debt in insolvency.
Project finance	Financing in which repayment depends primarily on the cash flows generated by a specific project rather than the borrower's overall balance sheet.
PQC	Post-Quantum Cryptography comprises cryptographic algorithms designed to remain secure against attacks by quantum computers
Quantum Computing	An emerging field of computing that exploits the principles of quantum quantum mechanics to solve certain competational problems more efficiently than classical computers
Risk management processes	In this questionnaire, this refers to the full lifecycle of risk management as defined in the EBA Guidelines on the management of ESG risks (EBA/GL/2025/01). It covers: (i) identifying and assessing risks, including materiality assessment; (ii) measuring risks; (iii) managing and mitigating risks, such as through risk appetite, scenario analysis, stress testing and ICAAP; and (iv) ongoing risk monitoring and internal reporting
ROE	Return on Equity
Senior HoldCo	Senior Holding Company Funding
Senior non-preferred debt	Senior unsecured debt contractually or statutorily subordinated to preferred senior debt and typically issued to meet MREL requirements.
SME	Small and Medium-sized Enterprise
Structured finance	Financing structures where repayment depends primarily on a pool of underlying financial assets or contractual cash flows.

TLAC	Total Loss-Absorbing Capacity
Tokenisation	Representation of financial assets or rights in digital form using distributed ledger or similar technology.
White labelling	An arrangement whereby a a financial institution provides products or services that are marketed and distributed under another firm's brand, regardless of whether that firm is regulated

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