

## Guidelines compliance table

EBA/GL/2020/07

(Update: 28 September 2020); Issue date: 2 June 2020; Application date: 3 August 2020

Guidelines on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis

The following competent authorities\* comply or intend to comply with the EBA's Guidelines on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis:

		<b>Competent authority</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
Member State				
BE	Belgium	National Bank of Belgium	<b>Complies</b>	<p>As of notification date, i.e. 30.07.2020.</p> <p>The National Bank of Belgium (NBB) recently issued circular NBB_2020_28. The circular was sent to the institutions concerned. The purpose of this circular is to implement the Guidelines of the European Banking Authority (EBA) of 2 June 2020 on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis (EBA/GL/2020/07) in Belgium.</p> <p>The circular can be found on the NBB website via the following link: <a href="https://www.nbb.be/en/articles/circular-nbb202028-guidelines-european-banking-authority-eba-2-june-2020-reporting-and">https://www.nbb.be/en/articles/circular-nbb202028-guidelines-european-banking-authority-eba-2-june-2020-reporting-and</a></p>

		<b>Competent authority</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
BG	Bulgaria	Bulgarian National Bank	<b>Complies</b>	As of notification date, i.e. 14.07.2020.
CZ	Czech Republic	Czech National Bank	<b>Does not comply and does not intend to comply</b>	<p>The Czech National Bank confirms the intention to comply with parts of the guidelines covering the disclosure requirements for the exposures subject to the payment moratoria in accordance with the GL on moratoria (EBA/GL/2020/02) and the disclosure requirements for the new loans subject to the specific public guarantees set up to mitigate the effects of COVID-19 crisis as of the date of this notification.</p> <p>The Czech National Bank confirms the intention not to comply with parts of the guidelines covering i) reporting requirements to monitor the use of payment moratoria and the evolution of the credit quality of the exposures subject to such moratoria in accordance with the GL on moratoria; ii) reporting requirements for the new loans subject to specific public guarantees set up to mitigate the effects of the COVID-19 crisis; iii) reporting requirements on other forbearance measures applied in response to COVID-19 crisis.</p> <p>The reason for non-compliance is primarily the implementation of a completely new national data collection system since EBA reporting framework version 2.9. In this context relevant credit institutions have to make a maximum effort to deliver standard collection of EU-level data requirements (COREP and FINREP) and their capacity to implement new technical packages and fulfill temporary reporting requirements is currently limited.</p> <p>Due to the necessity of having sufficient information on the application of payment moratoria</p>

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				and the public guarantees for the supervisory purposes, the national supervisory reporting requirements were introduced in timely manner. Therefore the Czech National Bank will not miss important data for its supervisory activities. In the EU context, most of data is covered by parent credit institutions settled in EU.
DK	Denmark	Danish Financial Supervisory Authority	<b>Complies</b>	As of notification date, i.e., 02.07.2020. Reporting requirements are activated in line with the guideline, i.e. on lending subject to public guarantees schemes in context of the covid-19 crisis as DK has not introduced covid-19 related moratoria (legislative or non-legislative) or covid-19 related forbearance measures. FINREP reporting institutions are subject to reporting requirements on the highest level of consolidation. Disclosure on public guarantees introduced in response to the COVID-19 crisis, only includes the largest national SIFI institutions, who are already reporting to FINREP, and only on the highest level of consolidation.
DE	Germany	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)	<b>Does not comply and does not intend to comply with parts of the guidelines / recommendations</b>	BaFin will partially comply with the EBA/GL/2020/07 by moving the first reference date for the required supervisory reporting from 30 June 2020 to 30 September 2020. This extended period to provide the first reporting information will be granted to the institutions to allow for an adequate period to implement the technical environment for an initial submission of the reporting templates directly in the XBRL format. The collection in this format is necessary in order to ensure that the reporting information for LSI can be forwarded to the EBA – as required from the reference date

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				<p>31.12.2020 – since EBA only accepts data reported in the XBRL-format. Furthermore, this approach allows the processing and analysis of larger data volumes, which are expected to be submitted due to the large number of German LSIs obliged to report the required data.</p> <p>For the rest BaFin will fully comply with the GL and is planning to implement a quarterly reporting of templates 90.1, 90.2, 91.1, 91.2 and 91.5 for all of the German Less Significant Institutions as well as the German Development Banks. In case of the disclosure BaFin plans to waive it for all institutions.</p>
EE	Estonia	Finantsinspektsioon	<b>Complies</b>	<p>As of notification date, i.e. 17.08.2020. Electronic link: <a href="https://www.fi.ee/et/juhendid/pan-gandus-ja-krediit/euroopa-pangandusjarelevalve-asutuse-suuniste-ebagl202007-covid-19-kriisiga-seotud-meetmete">https://www.fi.ee/et/juhendid/pan-gandus-ja-krediit/euroopa-pangandusjarelevalve-asutuse-suuniste-ebagl202007-covid-19-kriisiga-seotud-meetmete</a></p>
IE	Ireland	Central Bank of Ireland	<b>Intends to comply**</b>	<p>By 11.08.2020.</p> <p>The Central Bank of Ireland has taken steps to integrate the requirements of the Guidelines in its supervisory practices.</p> <p>With regard to proportionality:</p> <ul style="list-style-type: none"> <li>- Reporting of Payment Moratoria template is extended to LSI banks. The reporting requirement covers one Payment Moratoria per bank at the highest level of consolidation;</li> <li>- The frequency of reporting is on a monthly basis with the same remittance dates as the ECB, and</li> <li>- The templates can be reported in excel format between 30 June 2020 – 31 August 2020. The templates must be reported in XBRL format from 30 September 2020 onwards.</li> </ul>

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EL	Greece	Bank of Greece	<b>Complies</b>	As of notification date, i.e. 27.02.2020.
HR	Croatia	Hrvatska narodna banka (Croatian National Bank)	<b>Complies</b>	As of notification date, i.e. 04.08.2020. The Croatian National Bank sent a circular letter to all Croatian credit institutions, informing them that it expects them to apply the Guidelines. The expectation is for all credit institutions to submit four COVID reports and for systemically important credit institutions to disclose COVID information semiannually.
ES	Spain	Banco de España	<b>Complies</b>	As of notification date, i.e. 27.02.2020.
FR	France	Banque de France	<b>Complies</b>	As of notification date, i.e. 03.08.2020.
IT	Italy	Bank of Italy	<b>Complies</b>	As of notification date, i.e. 15.07.2020. <a href="https://www.bancaditalia.it/competi/vigilanza/normativa/archivio-norme/cirolari/c115/Com_30giugno2020.pdf">https://www.bancaditalia.it/competi/vigilanza/normativa/archivio-norme/cirolari/c115/Com_30giugno2020.pdf</a>
CY	Cyprus	Central Bank of Cyprus	<b>Complies</b>	As of notification date, i.e. 30.06.2020.
LV	Latvia	Financial and Capital Market Commission	<b>Complies</b>	As of notification date, i.e. 31.07.2020. To ensure compliance with the EBA Guidelines on 21.07.2020 the FCMC Regulations No 102 on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis was adopted (available in Latvian only following the link: <a href="https://likumi.lv/ta/id/316316-parskatu-un-informacijas-atklasanas-par-riska-darījumiem-kuriem-piemeroti-atbalstapasaakumi-covid-19-krizes-ietekme-normative">https://likumi.lv/ta/id/316316-parskatu-un-informacijas-atklasanas-par-riska-darījumiem-kuriem-piemeroti-atbalstapasaakumi-covid-19-krizes-ietekme-normative</a> ).
LT	Lithuania	Bank of Lithuania	<b>Complies</b>	As of notification date, i.e. 08.07.2020.

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				GL adopted by the Decision of the Director of the Supervision Service on 29 June, 2020. Resolution No V 2020/(21.25.E-2100)-241-161.
LU	Luxembourg	Commission de Surveillance du Secteur Financier (CSSF)	<b>Complies</b>	As of notification date, i.e. 31.07.2020.  See <a href="https://www.cssf.lu/wp-content/uploads/cssf20_748eng.pdf">https://www.cssf.lu/wp-content/uploads/cssf20_748eng.pdf</a>
HU	Hungary	Central Bank of Hungary	<b>Intends to comply**</b>	By 31.08.2020. The MNB has already implemented the “reporting” part of the EBA/GL/2020/07 through issuing two resolutions: <i>Resolution 309359-16/2020 és 309359-19/2020</i> . As concerns the “disclosure” part of the GL an executive circular is under development, which will ensure the compliance.
MT	Malta	Central Bank of Malta	<b>Complies</b>	As of notification date, i.e. 16.07.2020.  “In accordance with its power laid down in Article 4(7) of the Banking Act (Chapter 371 of the Laws of Malta) to issue Banking Rules, the Malta Financial Services Authority issued a new Banking Rule BR/23 on 07 July 2020, on Reporting and Disclosure of Exposures subject to Measures applied in Response to the COVID-19 Crisis. Pursuant to such measures, credit institutions are obliged to report information, in accordance with the formats as specified in the Rule, on: - exposures that are subject to payment moratoria in accordance with the Moratorium on Credit Facilities in Exceptional Circumstances Regulations, 2020 (L.N. 142 of 2020) and the Central Bank of Malta (CBM) Directive No. 18 on Moratoria on Credit Facilities in Exceptional Circumstances; - exposures that are subject to other forbearance measures

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				<p>introduced in response to the COVID-19 crisis; and</p> <ul style="list-style-type: none"> <li>- newly originated exposures subject to the Malta Development Bank COVID-19 Guarantee Scheme.</li> <li>- newly originated exposures subject to the Malta Development Bank COVID-19 Guarantee Scheme.</li> </ul> <p>The Malta Financial Services Authority has decided to take up the waiver in accordance with section 5 of the EBA Guidelines to require credit institutions to submit such reporting on a more frequent basis. Consequently, credit institutions are required to report such data on a monthly basis and in line with the following reference and remittance periods:</p> <ul style="list-style-type: none"> <li>a. reference reporting: on the last day of each month; and</li> <li>b. remittance reporting: 42 calendar days following each reporting reference date specified in paragraph (a) above.</li> </ul>
NL	Netherlands	De Nederlandsche Bank N.V. (DNB)	<b>Complies</b>	As of notification date, i.e. 31.07.2020.
AT	Austria	Austrian Financial Market Authority	<b>Does not comply and does not intend to comply with parts of the Guidelines**</b>	<p>The COVID-19-reporting requirements were transposed for LSI by amending the national reporting regulation (VERA-V, Regulation on Asset, Income and Risk Statement, new templates J1 and J2). The FMA has decided to waive the COVID-19-disclosure requirement for all less significant institutions that are not qualified as other systemically important institutions (notwithstanding voluntary disclosure). COVID-19-reporting was waived on a solo level for less significant institutions that form part of a banking group. The reporting frequency was kept at quarterly with 30.06.2020 as the</p>

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				<p>first reporting date (also following EBA remittance dates, only extending the period for the first submission by one week). With regard to the reporting content, The FMA did waive templates F 92.01, F 93.01 and F 93.02 completely. The remaining templates were transposed for large LSI banking groups (balance sheet total &gt; EUR 5 bn) in their entirety. To ensure a proportionate application, the remaining templates were transposed for small LSI banking groups (balance sheet total &lt; EUR 5 bn) and individual less significant banks not being part of a banking group by waiving certain “of which-columns” (see template J2 of VERA-V). As no waiver possibility is foreseen in the EBA/GL/2020/07 with regard to templates F 90.01, F 91.01 and F 91.05 for reporting on a consolidated basis, the FMA thus is partially compliant. In more detail, the FMA does not require small banking groups to report columns 0050-0060 in F 90.01, columns 0030-0050, 0070-0090, 0120-0140, 0160-0180 and 0200 in F 91.01 and columns 0030-0040, 0060-0070, 0100-0110 and 0130-0140 in F 91.05.</p> <p>Amendment of national reporting regulation (VERA-V, Regulation on Asset, Income and Risk Statement, new templates J1 and J2)</p> <p><a href="https://www.ris.bka.gv.at/eli/bgbl/II/2020/328/20200721">https://www.ris.bka.gv.at/eli/bgbl/II/2020/328/20200721</a> (Templates are in the Annexes (Anhänge) J1 and J2).</p>
PL	Poland	Komisja Nadzoru Finansowego	<b>Does not comply and does not intend to comply with parts of the Guidelines**</b>	<p>In the current situation of the COVID 19 pandemic, the PFSA has taken a number of initiatives to limit additional reporting obligations which facilitate banks' operations. The PFSA's initiatives were collected in the so-called PIN package (Supervisory Stimulus Package).</p>



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				<p>The proposal of new reports for banks mainly concerns those applying IFRS. Cooperative and association banks operating in Poland do not apply these regulations and are obliged to comply with Polish accounting standards. The package of domestic legal solutions differs significantly from the IFRS regulations.</p> <p>The reporting on COVID prepared by the EBA is designed for large banks applying IFRS. The detailed solutions adopted for these banks at the European Union level do not apply to cooperative and association banks operating in Poland. Given the extent of the changes in reporting, it should be assessed that it brings financial expenditures for changes in IT systems.</p> <p>Moreover, it should be noted that in the current situation the banking sector in Poland will face the environment of historically low interest rates and consequently the banks' revenues will be significantly decreased. The PFSA's preliminary estimates that only in 2020 the profit of banks will fall by over 80% compared to the previous year. Therefore in the PFSA's opinion it does not seem necessary to burden the banks with additional reporting, which will involve additional costs. Additionally, cooperative banks were required to describe the effects of counteracting the COVID 19 pandemic and to provide some additional reporting information together with materials for 2019 SREP. The material to be provided by these banks fully addresses the current supervisory needs. If necessary, the PFSA has the possibility to ask banks for additional information.</p> <p>Therefore, at this stage, there is no need to impose an additional burden of new reporting on the</p>

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				<p>banks, which, in addition, is not appropriate to the scale and complexity of the business and is not aligned with the existing accounting rules for cooperative banks. So the guidelines will not be applied to cooperative banks in Poland and their association banks. Referring to all other banks (commercial banks) the guidelines will be applied, also regarding the proportionality rule as specified in the Par 19 of the guidelines.</p> <p>Additionally, the PFSA would like to deliver the September Data to the EBA in the Excel format as it encounters some technical adjustment difficulties on converting the templates into EBA XBRL.</p>
PT	Portugal	Banco de Portugal	<b>Intends to comply**</b>	<p>By 30.06.2020.</p> <p>Regarding the possible waivers set out in point 19 of the Guidelines, Banco de Portugal determined that:</p> <ul style="list-style-type: none"> <li>- Reporting requirements will be requested at the institution's highest level of consolidation, on a monthly basis and including all reporting Tables;</li> <li>- Disclosure requirements will be requested on an annual basis for institutions that are not identified as global or other systemically important institutions;</li> <li>- The reporting format to be adopted will be the XBRL format. Excel will be permitted for the first three reporting dates.</li> </ul>
RO	Romania	National Bank of Romania	<b>Intends to comply**</b>	<p>When necessary legislative or regulatory proceedings have been completed. The process of transposing the above mentioned Guideline in the Instructions has begun. The related Instructions will be published on the NBR website no later than August 7, 2020.</p>

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SI	Slovenia	Bank of Slovenia	<b>Complies</b>	<p>As of notification date, i.e. 27.07.2020.</p> <p>Link to the measures published in the relevant jurisdiction (Uradni list RS, št. 104/2020, 24 July 2020 – 1958. Sklep o uporabi Smernic o poročanju in razkritju izpostavljenosti, za katere veljajo ukrepi, uporabljeni kot odziv na pandemijo COVID-19 - <a href="https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina/2020-01-1958/sklep-o-uporabi-smernic-o-porocanju-in-razkritju-izpostavljenosti-za-katere-veljajo-ukrepi-uporabljeni-kot-odziv-na-pandemijo-covid-19-ebagl202007">https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina/2020-01-1958/sklep-o-uporabi-smernic-o-porocanju-in-razkritju-izpostavljenosti-za-katere-veljajo-ukrepi-uporabljeni-kot-odziv-na-pandemijo-covid-19-ebagl202007</a>).</p> <p>The Bank of Slovenia decided to apply the following proportionality measures outlined in paragraph 19 of the Guidelines:</p> <ul style="list-style-type: none"> <li>– in accordance with point a), banks that are required to report on a sub-consolidated or consolidated basis are exempted from reporting on an individual basis, and</li> <li>– in accordance with point c), banks that are not defined as other systemically important banks are not required to report templates Nos. 90.02, 90.03, 91.02, 91.03, 91.04, 92.01, 93.01 and 93.02 in Annex 1 of the guidelines.</li> </ul>
SK	Slovakia	Národná banka Slovenska	<b>Intends to comply**</b>	<p>When necessary legislative or regulatory proceedings have been completed.</p> <p>Národná banka Slovenska will comply with the respective GL on Covid-19 reporting and disclosure as of the date of issue the regulatory act in the form of guidelines or measures. The form of the act is currently subject to internal approval and will be issued in due course.</p>

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FI	Finland	Finanssivalvonta (FIN-FSA)	<b>Intends to comply**</b>	When necessary legislative or regulatory proceedings have been completed. The intention of the FIN-FSA is that when the necessary administrative measures have been taken, the Guidelines will be complied with in such a way that the first reference date for the reporting will in any case be no later than 30 September 2020.
SE	Sweden	Finansinspektionen (Swedish Financial Supervisory Authority)	<b>Complies</b>	As of notification date, i.e. 26.06.2020. <a href="https://www.fi.se/sv/publicerat/nyheter/2020/fi-tillampar-riktlinjer-for-moratorier-for-lanebetalningar-och-for-rapportering-och-offentliggorande-av-exponeringar-som-berors-av-covid-19-atgarder/">https://www.fi.se/sv/publicerat/nyheter/2020/fi-tillampar-riktlinjer-for-moratorier-for-lanebetalningar-och-for-rapportering-och-offentliggorande-av-exponeringar-som-berors-av-covid-19-atgarder/</a>
UK	United Kingdom	PRA	<b>Does not comply and does not intend to comply with parts of the Guidelines**</b>	The Prudential Regulation Authority ('the PRA') wishes to notify the EBA of partial non-compliance with the EBA Guidelines on COVID-19 measures – reporting and disclosure ('The Guidelines').  On 3 June 2020 the PRA notified the EBA of its intention not to comply with the EBA Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis ("the moratoria Guidelines"). As the PRA has not implemented the moratoria Guidelines in full, and considers that a wider class of general payment moratoria that is also capable of complying with CRR's requirements may exist, the reporting instructions in the Guidelines regarding 'EBA compliant moratoria' and 'Other COVID-19 related forbearance' would be difficult for UK firms to apply, and the ensuing reporting may not fulfil all of the objectives set out in the Guidelines. As UK credit institutions are already reporting to the PRA on COVID-19 related payment deferrals and

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				<p>lending under the UK Government's business lending schemes in a more frequent and granular manner, it would be additionally disproportionate for UK credit institutions to implement the reporting requirements in the Guidelines.</p> <p>The PRA has sought to apply the disclosure templates in the Guidelines proportionately by exercising the proportionality options in the Guidelines including (i) waiving the application of the disclosure templates for firms that are not identified as global or other systemically important institutions, and (ii) applying the disclosure templates at the highest level of consolidation in their jurisdiction. In order to further align the application of the disclosure templates in the Guidelines with the business relevant to the subject matter of the templates, the PRA has also further waived the application of the disclosure templates for credit institutions with less than £50 billion in retail deposits on an individual or consolidated basis, thus capturing only the largest UK-based credit institutions. The PRA has amended the disclosure templates it is applying to reflect the UK approach to payment deferrals, thereby broadening the scope of moratoria disclosed to ensure consistency with the PRA's position on the moratoria Guidelines. As the accounting reference date of some UK firms does not fall on 31 December, the PRA expects that disclosures may be made on other reference dates to 30 June and 31 December in line with the annual and semi-annual Pillar 3 reference dates of these firms. Taking into account proximity of the publication of the first disclosure by</p>

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				many firms to the 30 June 2020 reference date, the PRA has exercised flexibility in its timing expectations for publication of the disclosures as at 30 June 2020. The PRA accepts that UK firms may need to disclose separately to the main Pillar 3 report for the 30 June 2020 reference date. Disclosures made for all subsequent reference dates are expected to be made in the main Pillar 3 report. Considering the evolving approach and tenure of the range of payment deferrals and lending subject to public guarantee schemes in the UK, the PRA will consider the continued application of the disclosure requirements after 31 December 2020.
		Financial Conduct Authority (FCA)		

EU Institutions – Agencies

Single Supervisory Mechanism		<b>Complies</b>	As of notification date, i.e. 04.08.2020. Significant Institutions as defined in Council Regulation (EU) No 1024/2013 of 15 October 2013 conferring specific tasks on the European Central Bank concerning policies relating to the prudential supervision of credit institutions.
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EEA – EFTA State

IS	Iceland	Fjármálaeftirlitið (Financial Supervisory Authority, Iceland)	<b>Complies</b>	As of notification date, i.e. 29.06.2020. See: <a href="https://www.fme.is/log-og-tilmali/ees-vidmidunarreglur/eba/">https://www.fme.is/log-og-tilmali/ees-vidmidunarreglur/eba/</a> .
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LI	Liechtenstein	Financial Market Authority Liechtenstein (FMA)	<b>Intends to comply**</b>	By 30.09.2020.
NO	Norway	The Financial Supervisory Authority of Norway	<b>Does not comply and does not intend to comply**</b>	There are no moratoria in Norway that the FSA considers to be covered by the EBA Guidelines on moratoria. Furthermore, the FSA has already introduced monthly reporting that covers some of the requirements not subject to the said Guidelines on moratoria.

\*The EEA States other than the Member States of the European Union are not currently required to notify their compliance with the EBA's Guidelines. This table is based on information provided from those EEA States on a voluntary basis.

\*\* Please note that, in the interest of transparency, if a competent authority continues to intend to comply after the application date, it will be considered "non-compliant" unless (A) the Guidelines relate to a type of institution or instruments which do not currently exist in the jurisdiction concerned; or (B) legislative or regulatory proceedings have been initiated to bring any national measures necessary to comply with the Guidelines in force in the jurisdiction concerned.

### Notes

Article 16(3) of the EBA's Regulations requires national competent authorities to inform us whether they comply or intend to comply with each Guideline or recommendation we issue. If a competent authority does not comply or does not intend to comply it must inform us of the reasons. We decide on a case by case basis whether to publish reasons.

The EBA endeavour to ensure the accuracy of this document, however, the information is provided by the competent authorities and, as such, the EBA cannot accept responsibility for its contents or any reliance placed on it.

For further information on the current position of any competent authority, please contact that competent authority. Contact details can be obtained from the EBA's website [www.eba.europa.eu](http://www.eba.europa.eu).