# Risk Assessment Questionnaire – Summary of Results

EUROPEAN BANKING AUTHORITY

EBA



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## Introduction

The EBA conducts semi-annual Risk Assessment Questionnaires (RAQs) among banks and market analysts. This booklet presents a summary of the responses to the RAQs carried out in Autumn 2022, in which 60 banks<sup>1</sup> and 9 market analysts submitted their answers. Results of the survey were received in September 2022. The RAQ results are published together with the EBA's quarterly Risk Dashboard (Q3 2022).

The results of the survey are presented in an aggregated form. The questionnaires are available in the Appendices. Charts numbers correspond to the question numbers in the questionnaires. Where relevant, answers from former questionnaires may be presented. For questions for which only one answer was permitted, any potential difference between the sum of shown responses and 100% is due to respondents answering either "n/a" or "no opinion". In the summary of the main results, figures are rounded.

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

<sup>&</sup>lt;sup>1</sup> A list of banks participating in the survey is published in the Annex.



## Summary of main findings

Higher interest rates, elevated inflation levels and bleak economic growth prospects have influenced banks and analysts' responses to the EBA's Autumn 2022 RAQ. Banks and analysts are rather optimistic about the overall impact on profitability although they also show some concerns about asset quality deterioration and funding costs. These concerns in part reflect the negative impact of higher inflation as well as the Russian war of aggression against Ukraine, including the associated official sanction packages.

### Business model, strategy, and profitability

- Banks and analysts have partially recovered the optimism about profitability prospects. After a fall in the Spring 2022 questionnaire, the share of banks and analysts expecting an increase in profitability has risen to 70% and 80% respectively in this edition (50% and 25% respectively in the previous RAQ). In particular, banks are rather optimistic about the impact of rising rates, with 75% of them expecting an overall positive impact on profitability. (Questions 1 and 3 for banks and Question 1 for market analysts)
- Loan repricing will be key for profitability improvement. Net interest income (NII) has become the main area banks are targeting to improve their profitability. In previous surveys most of the banks selecting this option pointed to increasing lending volumes as the main strategy to increase NII (e.g., 85% in the Spring 2022 RAQ). In this questionnaire loan repricing is the option most commonly selected (55% vs 40% for increasing lending volumes). Commercial Real Estate (CRE), Corporate and SME lending are the portfolios where banks expect a larger proportion of loans repricing in the next 12 months. On the contrary, the repricing is expected to be rather slow for residential loans, where 60% of the banks report interest rate fixation periods at origination longer than 5 years. (*Questions 2, 7 and 8 for banks*)

### **Funding and liquidity**

• Banks intend to continue to focus on MREL-eligible instruments. Similar to the previous RAQ, banks point at senior non-preferred/senior HoldCo as the main funding category they will focus over the next 12 months (more than 50%). A similar percentage of banks point to senior preferred – which is also MREL-eligible for many banks. Several banks also plan to focus on covered bonds (35%) presumably to refinance maturing TLTRO-3 borrowing. An increasing share of analysts expect banks to focus on retail deposits (45% in this questionnaire vs 20% in Spring 2022). (Question 9 banks and Question 5 for market analysts)



• Funding costs are an increasing concern for banks and analysts. Analysts are unanimous about increasing deposit costs. A rising share of banks also expect an increase in household and NFC deposit rates (55% and 70% in this questionnaire vs 20% and 35% in Spring 2022). In relation to the obstacles for the issuance of MREL-eligible debt, 60% of the banks point to pricing (40% and 50% in Autumn 2021 and Spring 2022 respectively). (Questions 10 and 11 for banks and Question 6 for market analysts)

#### Asset volume trends and asset quality

- Residential mortgages, corporates, and small and medium enterprises (SMEs) continue to appear as the segments where more banks plan to increase lending. Market analysts also point to sovereigns and institution (65%) as portfolios banks will show an interest in. (Question 12 for banks and Question 8 for market analysts)
- Asset quality expectations have continuously deteriorated since the Spring 2022 questionnaire. SMEs and consumer lending are the segments that banks and analysts most point out. Nonetheless, a slightly increasing share of banks expect a cost of risk (CoR) level below 25 bps (55% in this questionnaire vs 50% in the previous one). Analysts are more cautious and only 10% of them expect a CoR below 25 bps (20% in the previous questionnaire). (Questions 13 and 14 for banks and Question 9 and 10 for market analysts)
- There is a high degree of heterogeneity on the planned treatment of the COVID-19 overlays in banks' provisioning. On the one hand, 45% of institutions have already released or are going to release them in the next 6-12 months. On the other hand, a similar percentage of the sample is following a more prudent approach with 15% of banks planning to retain their COVID-19 overlays to cover potential COVID-19 losses and 35% of banks planning to release them while recognising similar sized overlays to account for emerging risks. Most banks (85%) have already recognised provisioning overlays for reasons other than COVID-19. A very large share (70%) of banks point to the Russian invasion of Ukraine as a main reason for provision overlays post pandemic, while 40% point to higher inflation. (Question 15 and 16 for banks)

#### Conduct, reputation, and operational risk

- Cyber risk and data security, and conduct and legal risk are the main perceived sources of operational risk. In line with previous questionnaires, cyber risk and data security is pointed by 80% of both analysts and banks. However, conduct and legal risk has increased substantially compared to the previous questionnaire (from 10% to 55% in the case of analysts and from 45% to 60% in the case of banks). A high volume and frequency of cyber-attacks is reflected in RAQ observations. 45% of responding banks were subject to cyber-attacks in the first half of 2022, thereof 10% to 21 attacks or more. Around 10% of banks noted to have been victim of 1 to 5 successful cyber-attacks in the first half of 2022. (Questions 18, 21 and 22 for banks and question 3 for market analysts)
- Risks related to customers' transactions received from, or sent to, jurisdictions that are subject to international sanctions are the most relevant money laundering/terrorist financing (ML/TF) risks for banks (30% consider it a high significance risk). Banks seem to consider their internal



policies, procedures, and controls for the implementation of sanctions mature enough as only 15% of them see risk of non-compliance with applicable restrictive measures regimes as a main operational risk. Risks associated with customers whose ownership and control structure are opaque or unduly complex, and with customers dealing in cryptos are also relevant for banks. Payment and settlement are the activities where more banks (65%) see an increasing ML/TF risk. (Questions 18, 19 and 20 for banks)

### Fintech

- 95% of banks reported using, pilot testing or developing application programming interfaces
   (APIs) and artificial intelligence (AI) solutions. The significant increase in the use of cloud
   computing (from 70% of banks to 85%) is likely driven by the digitalisation initiatives and the
   need to enable the adoption of new technological solutions, for example AI/ML-based solutions.
   Moreover, while less than 10% of banks are using or pilot testing quantum computing solutions,
   25% of banks are already discussing the potential of this technology in the financial sector.
   (Question 24 for banks)
- The use of AI is mostly reported in the area of fraud detection, creditworthiness assessment/credit scoring, and client or transaction profiling/clustering. In addition, the AI methods and approaches used by banks appear to be increasingly diverse and complex. For example, while the most reported approaches are decision trees (85% of responding banks use it for at least one of the use cases) and regression analysis (80%), other approaches are also increasingly used by banks, in particular natural language processing (65%) and neural networks (60%) used, for example, in fraud detection. (Question 25 for banks)

### ESG

- Large corporates continue to be the main recipients of bank loans with green or social objectives. Proceeds-based green loans and sustainability-linked loans are the most common form in banks' lending to NFCs (90% and 60% of banks indicating as such, respectively). Similarly, loans that are a combination of proceeds- and performance-based are also pointed by 75% of banks. Green loans are the product offered most widely across all counterparty types whilst the market for social products remains smaller according to banks responses. Banks identify a lack of data and transparency as the most relevant impediment for the further development of the green retail loan market (75% rank this as either an extremely or significantly relevant impediment) followed by regulatory uncertainty and a lack of common definitions. *(Questions 27 and 29 for banks)*
- The EU Taxonomy remains as the main standard for banks originating or planning to originate green loans. The EU Taxonomy is the standard most widely used by banks to all types of counterparties. Banks complement the EU Taxonomy mostly with their internal definitions as well as other market standards across all types of loans. (*Question 28 for banks*)
- Green bonds are the main sustainability-related funding instrument. The share of banks stating to have issued green bonds remains significantly higher (75%) compared to other sustainability funding instruments. Looking ahead, analysts also remain positive about the issuance volume of

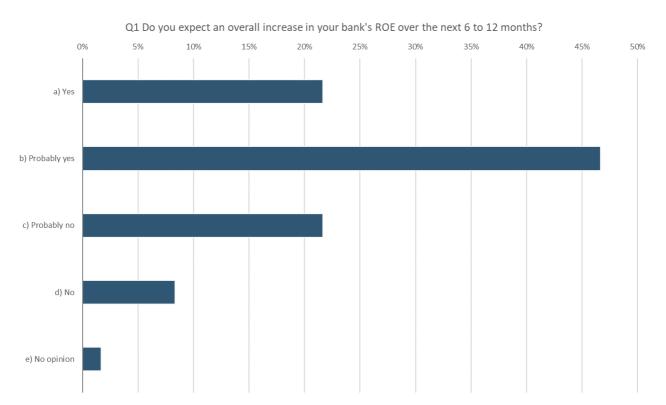


the green bonds with 65% of them expecting it to increase in the next 12 months. Most banks (65%) also indicate to have witnessed pricing benefits when issuing green bonds (up from just under 60% in the Spring 2022 questionnaire). While remaining significantly lower, such pricing benefit slighted increased also for social, sustainable, and sustainability-linked bonds compared to the previous RAQ. The share of banks indicating pricing benefit for these bonds remain between 10% and 20%. (*Question 30 and 31 for banks and question 11 for market analysts*)



## Banks' questionnaire

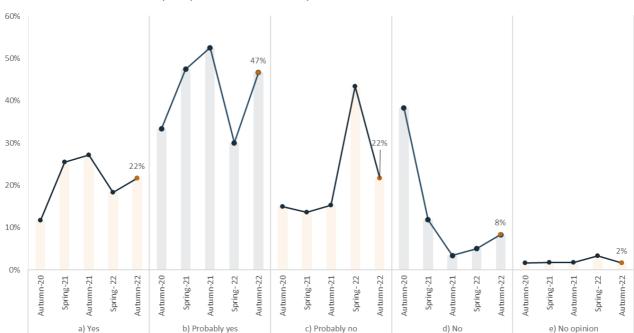
### 1. Business model / strategy / profitability



#### Question 1: Autumn 2022 results



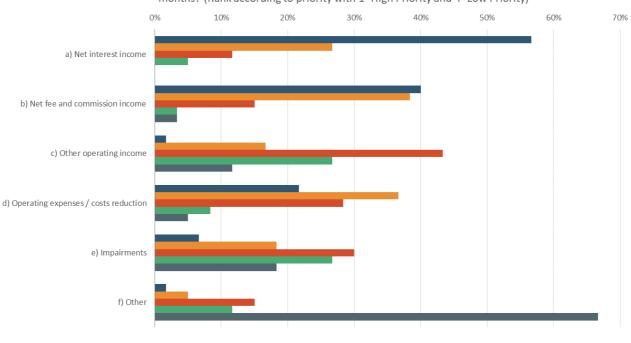
#### **Question 1: Comparison with earlier results**



Q1 Do you expect an overall increase in your bank's ROE over the next 6 to 12 months?



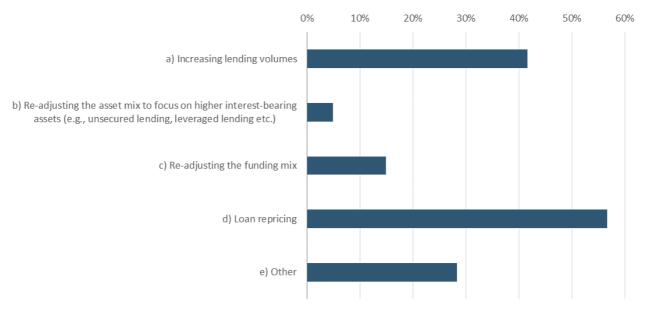
#### Question 2: Autumn 2022 results



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)

■1 ■2 ■3 ■4 ■N/A

Q2.1 If you rank net interest income with (1) or (2), what are the main areas to increase net interest income?



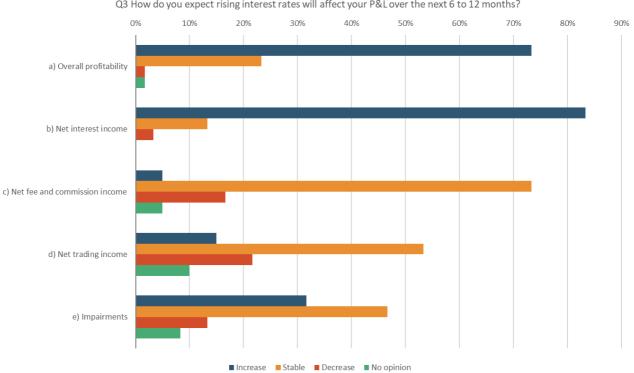


#### **Question 2: Comparison with earlier results**



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) HIGH PRIORITY

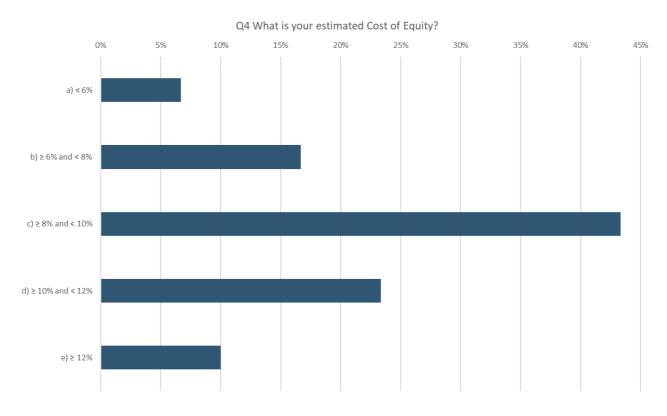
#### **Question 3: Autumn 2022 results**



Q3 How do you expect rising interest rates will affect your P&L over the next 6 to 12 months?

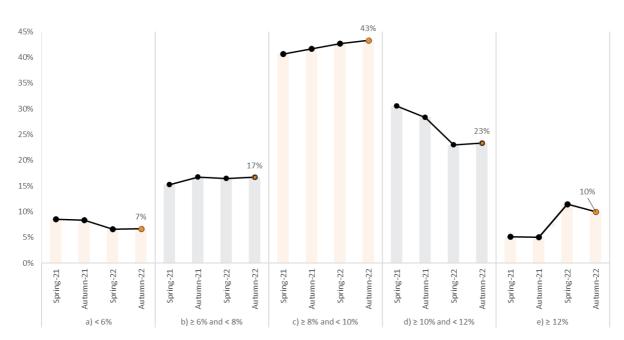


#### **Question 4: Autumn 2022 results**



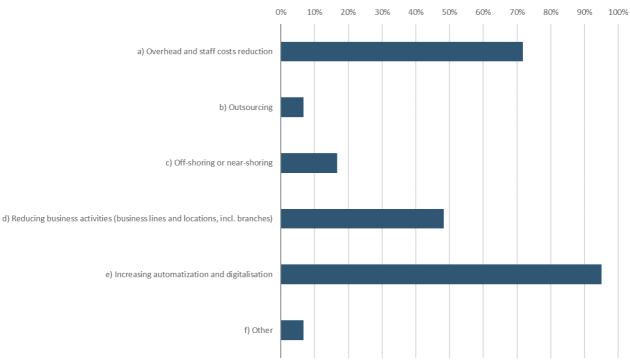
#### **Question 4: Comparison with earlier results**

#### Q4 What is your estimated Cost of Equity?





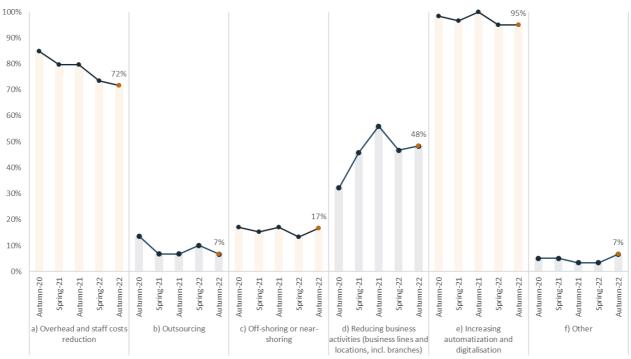
#### **Question 5: Autumn 2022 results**



Q5 Which measures are you primarily taking to reduce operating expenses / costs?

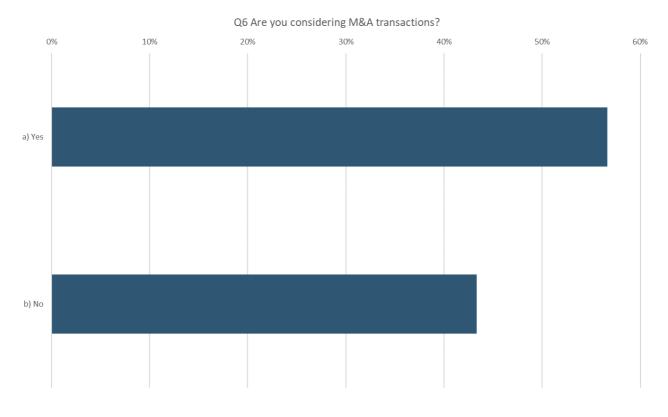
#### **Question 5: Comparison with earlier results**



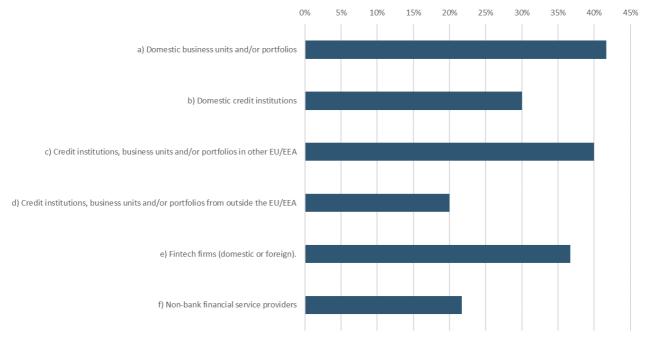




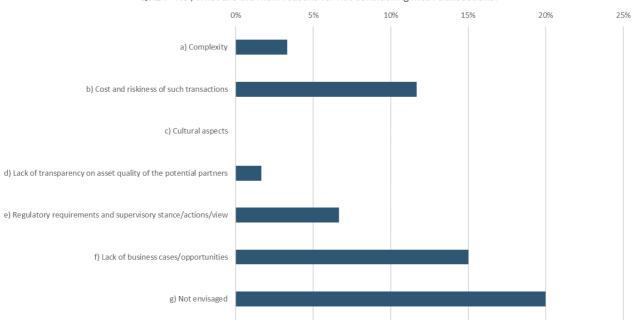
#### **Question 6: Autumn 2022 results**



Q6.1 If 'Yes', are you potentially considering M&A transactions with/of?





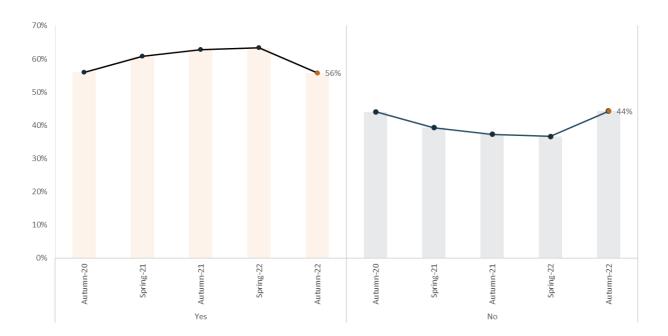


#### Q6.2 If 'No', what are the main reasons for not considering M&A transactions?



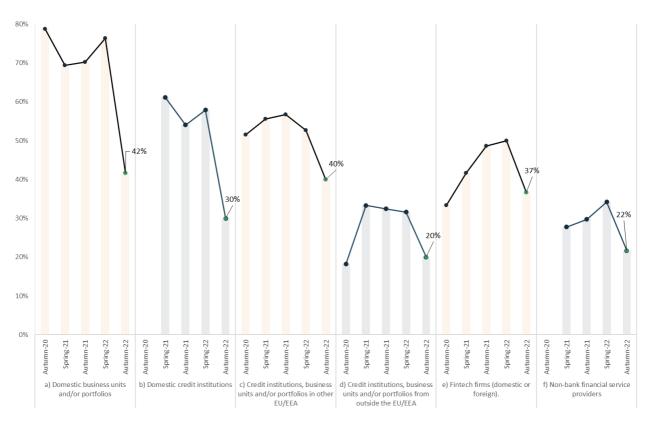
#### **Question 6: comparison with earlier results**





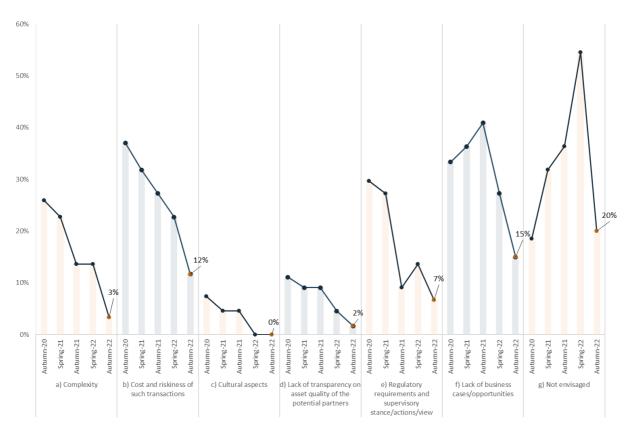


Q6.1 If 'Yes', are you potentially considering M&A transactions with/of?



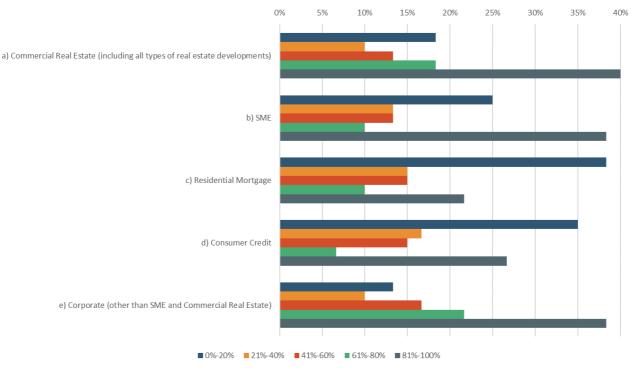


Q6.2 If 'No', what are the main reasons for not considering M&A transactions?





#### **Question 7: Autumn 2022 results**



Q7 What is the share of outstanding loans repricing in less than 12 months for the following portfolios?

#### **Question 8: Autumn 2022 results**

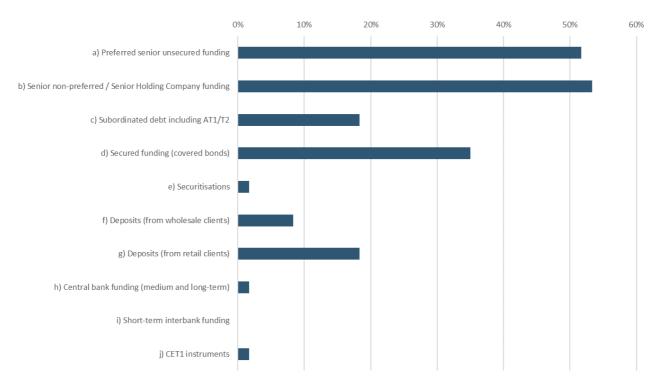
Q8 What is the average interest rate fixation period for the following loan portfolios (at origination)? If the rate is fixed for the whole life of a loan, please, select the bucket corresponding to its maturity





## 2. Funding / liquidity

### Question 9: Autumn 2022 results

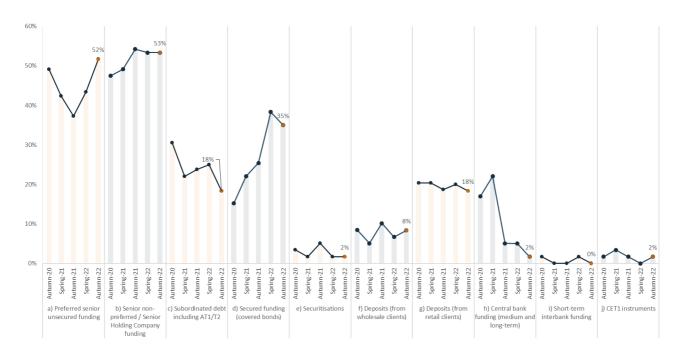


Q9 In the next 12 months, which funding instruments do you intend to focus on?

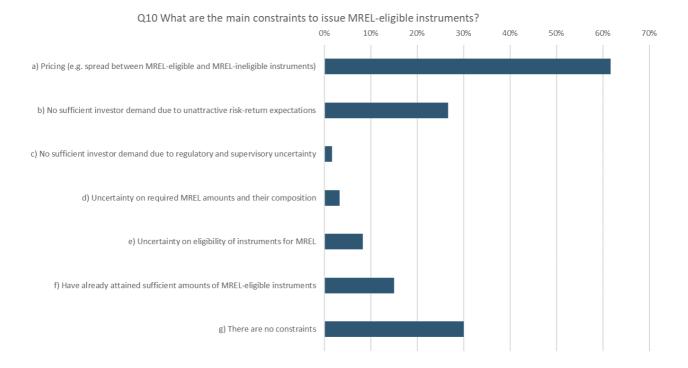


#### **Question 9: comparison with earlier results**

Q9 In the next 12 months, which funding instruments do you intend to focus on?



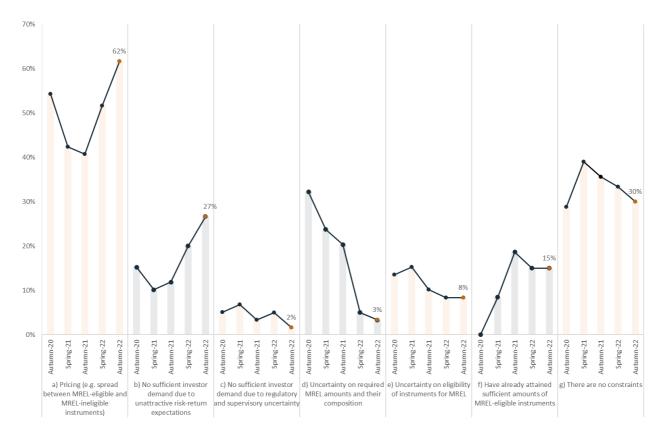
#### Question 10: Autumn 2022 results





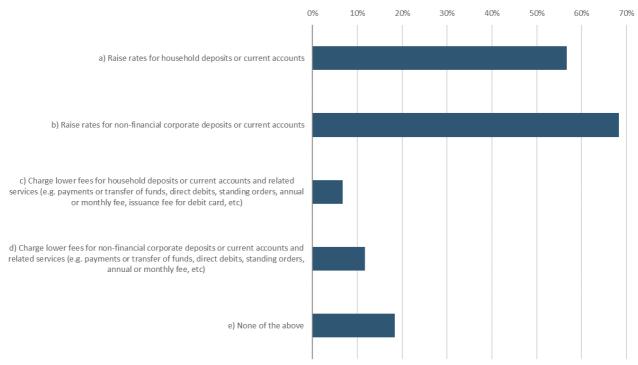
#### **Question 10: comparison with earlier results**

Q10 What are the main constraints to issue MREL-eligible instruments?





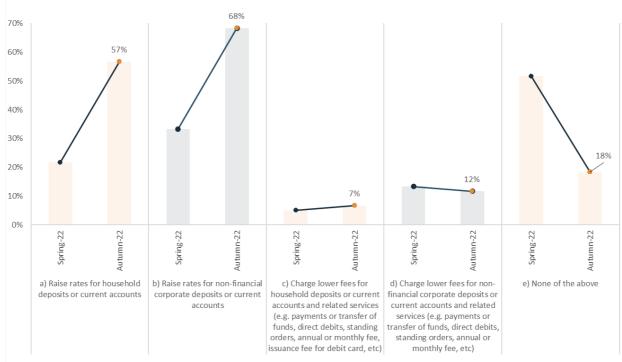
#### Question 11: Autumn 2022 results



Q11 Given rising interest rates, which of the following actions are you considering in relation to deposits?

#### Question 11: comparison with earlier results

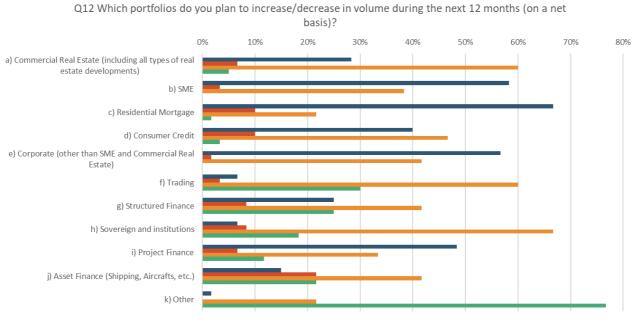
Q11 Given rising interest rates, which of the following actions are you considering in relation to deposits?





### 3. Asset composition and quality

#### Question 12: Autumn 2022 results

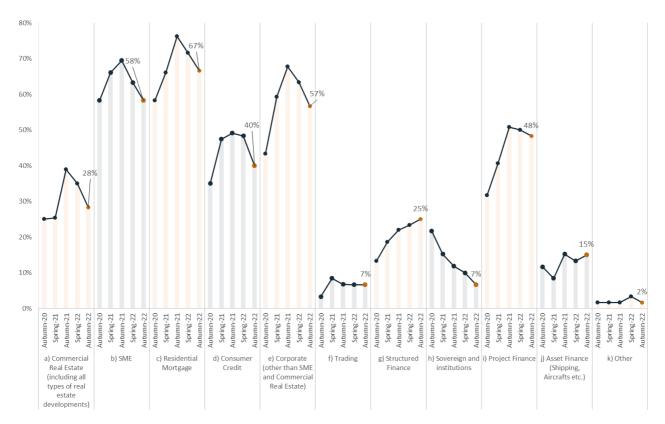


<sup>■</sup> Increase ■ Decrease ■ Stable ■ No Opinion



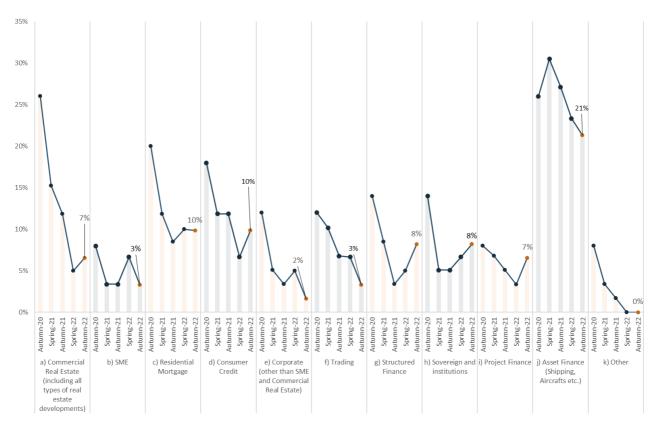
#### **Question 12: comparison with earlier results**

Q12 Which portfolios do you plan to increase/decrease in volume during the next 12 months (on a net basis)? INCREASE



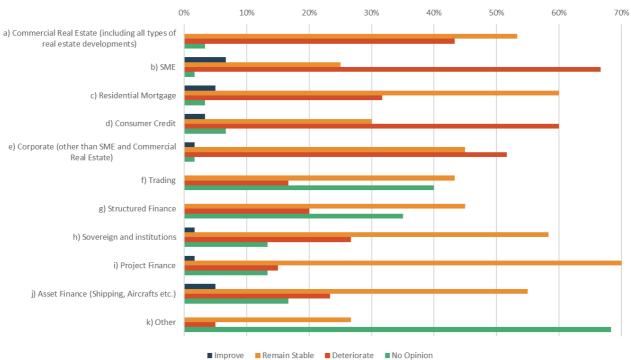








#### Question 13: Autumn 2022 results

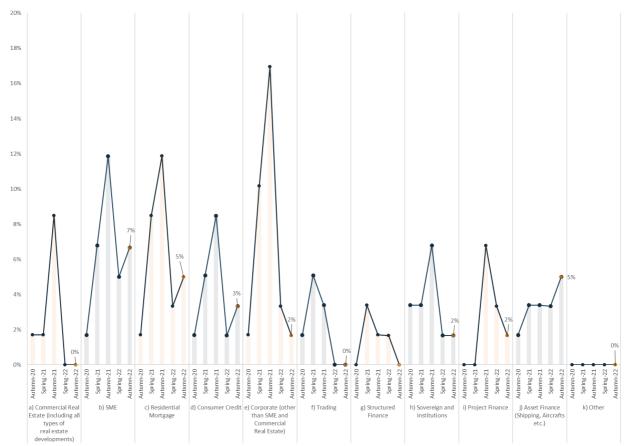


#### Q13 Which portfolios do you expect to improve/deteriorate in asset quality in the next 12 months?

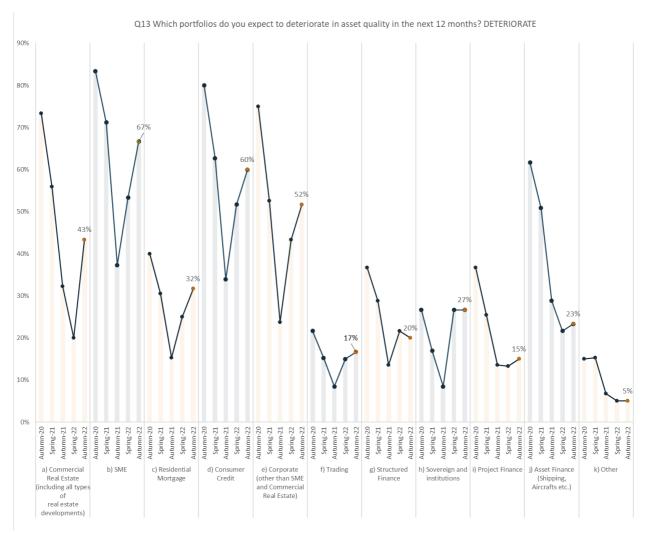


#### **Question 13: comparison with earlier results**

Q13 Which portfolios do you expect to imporove in asset quality in the next 12 months? IMPROVE

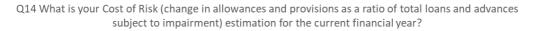


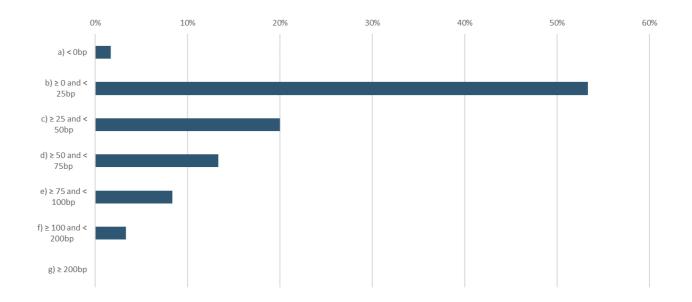




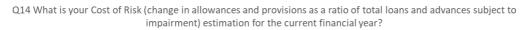


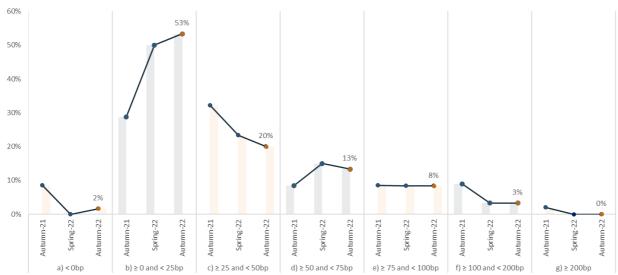
#### Question 14: Autumn 2022 results





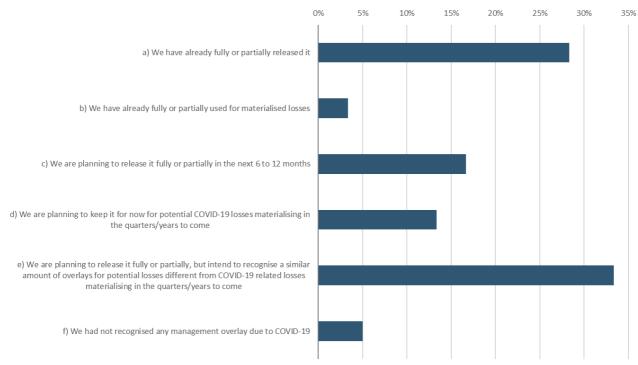
#### **Question 14: comparison with earlier results**







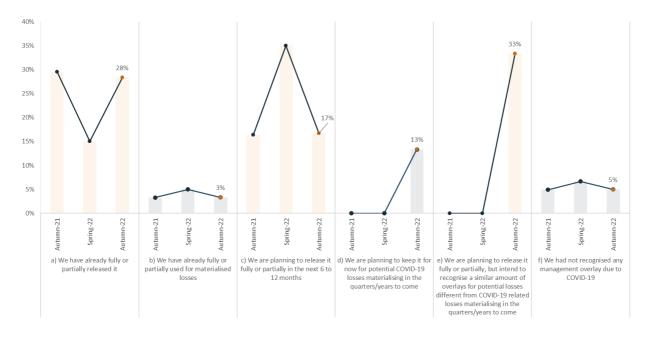
#### Question 15: Autumn 2022 results



Q15 How are you planning to treat any "COVID-19 overlay" in your provisioning?

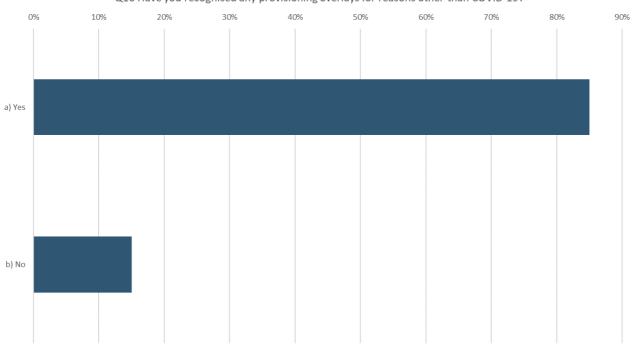
#### **Question 15: comparison with earlier results**

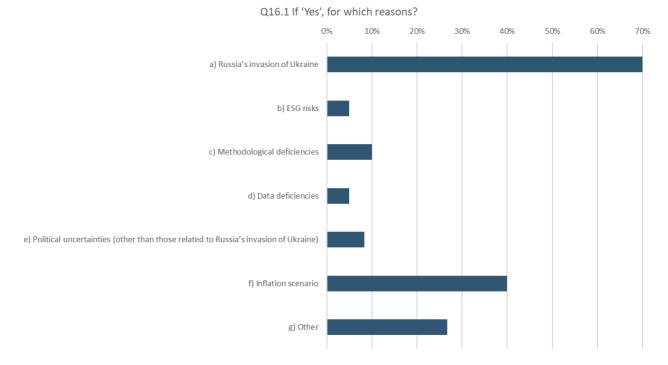
Q15 How are you planning to treat any "COVID-19 overlay" in your provisioning?





#### Question 16: Autumn 2022 results

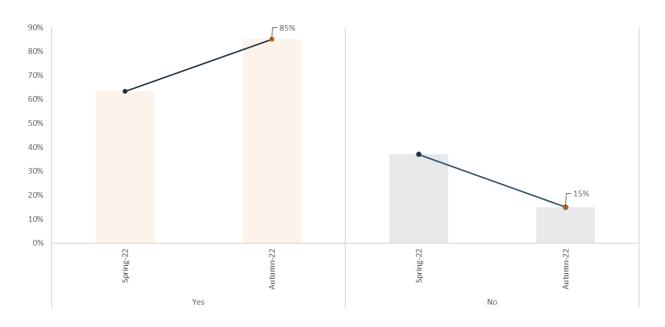






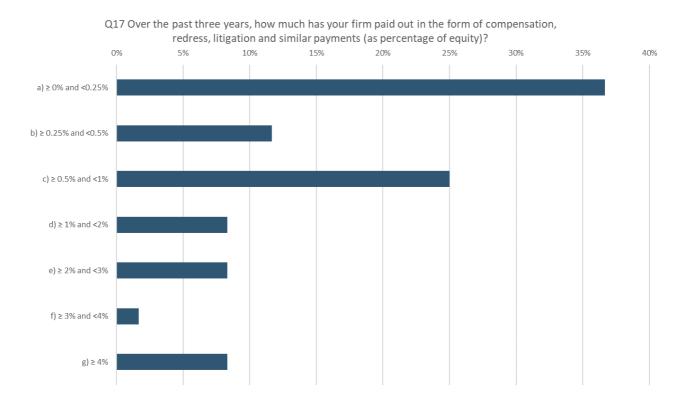
#### **Question 16: comparison with earlier results**

Q16 Have you recognised any provisioning overlays for reasons other than COVID-19?





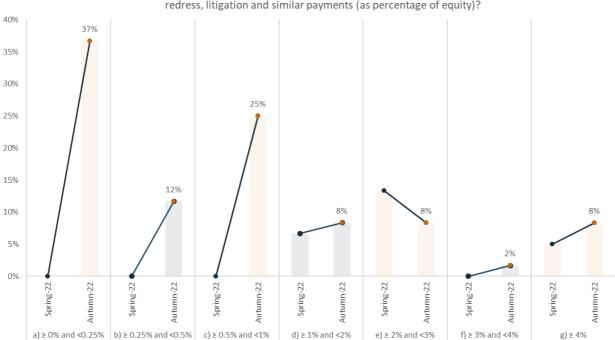
### 4. Conduct, Reputational and Operational Risk



#### **Question 17: Autumn 2022 results**



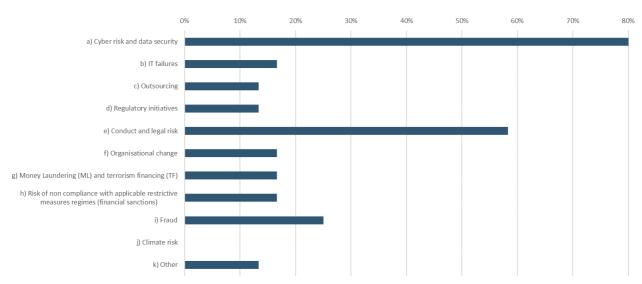
#### **Question 17: comparison with earlier results**



Q17 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)?

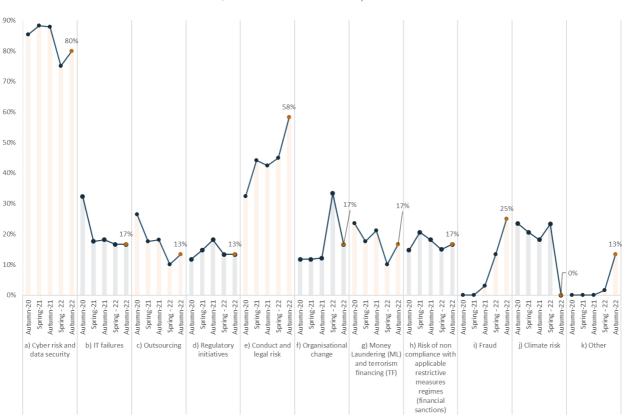
#### Question 18: Autumn 2022 results

#### Q18 What are the main drivers of operational risk?





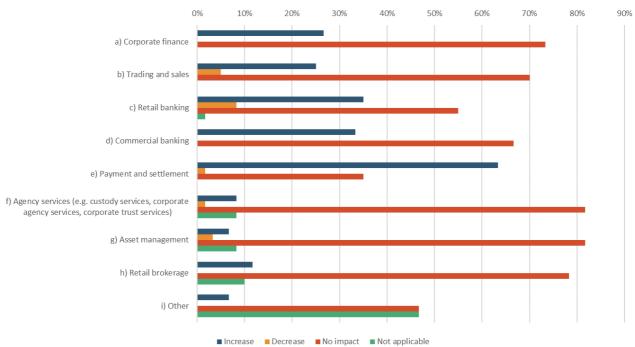
#### **Question 18: comparison with earlier results**



Q18 What are the main drivers of operational risk?



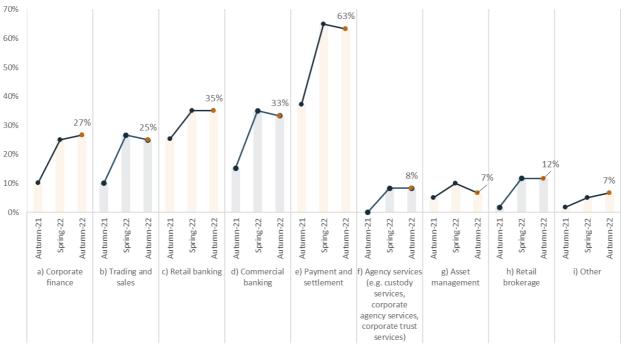
#### Question 19: Autumn 2022 results



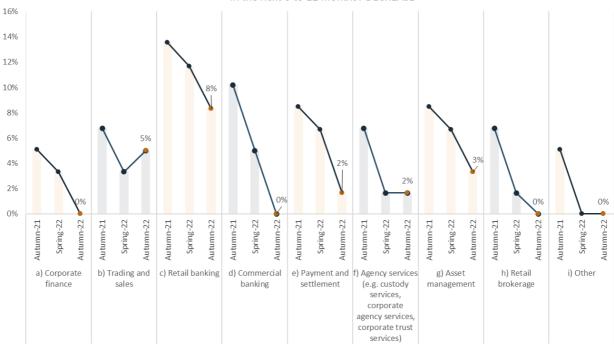
Q19 How do you expect your ML and TF risks related to the following products / business lines to evolve in the next 6 to 12 months?

#### Question 19: comparison with earlier results





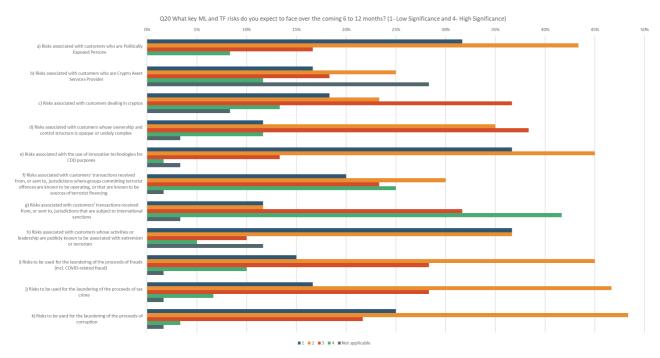




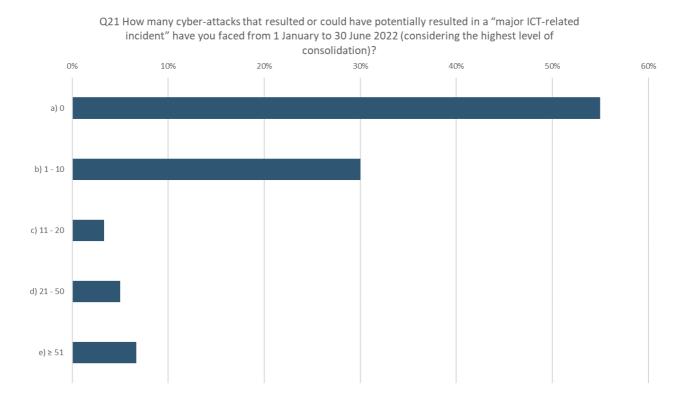
Q19 How do you expect your ML and TF risks related to the following products / business lines to evolve in the next 6 to 12 months? DECREASE



#### Question 20: Autumn 2022 results

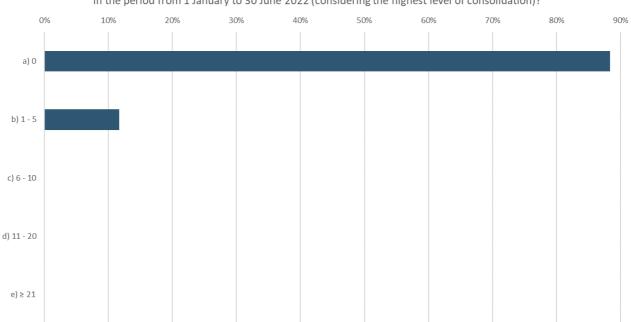


#### Question 21: Autumn 2022 results





#### Question 22: Autumn 2022 results

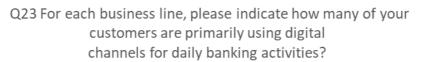


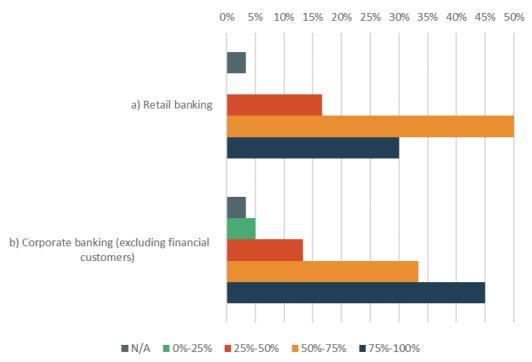
Q22 How many successful cyber-attacks resulting in "major ICT-related incidents" have you faced in the period from 1 January to 30 June 2022 (considering the highest level of consolidation)?



## 5. FinTech

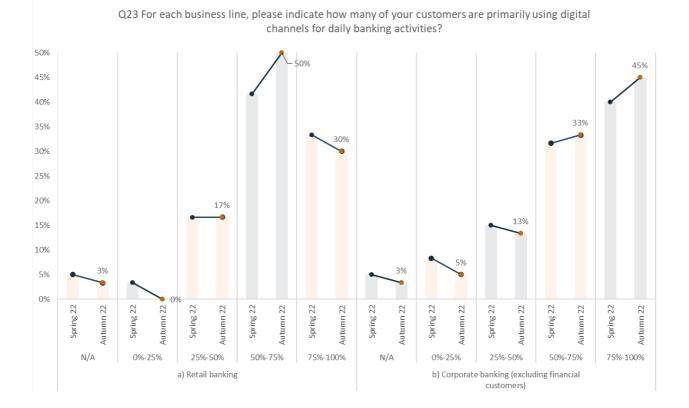




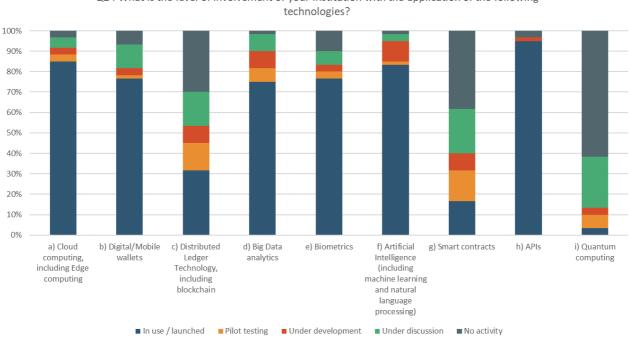




#### **Question 23: comparison with earlier results**



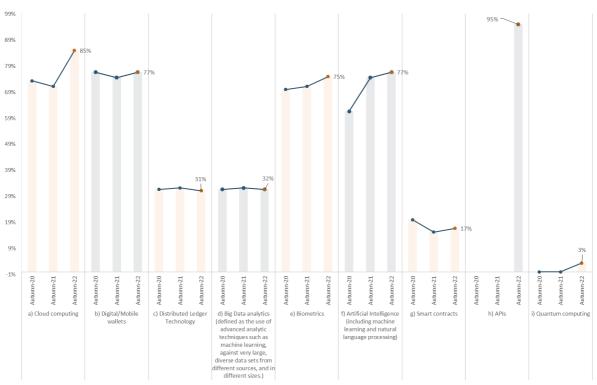
#### **Question 24: Autumn 2022 results**



Q24 What is the level of involvement of your institution with the application of the following



#### Question 24: comparison with earlier results



Q24 What is the level of involvement of your institution with the application of the following technologies? in use / launched

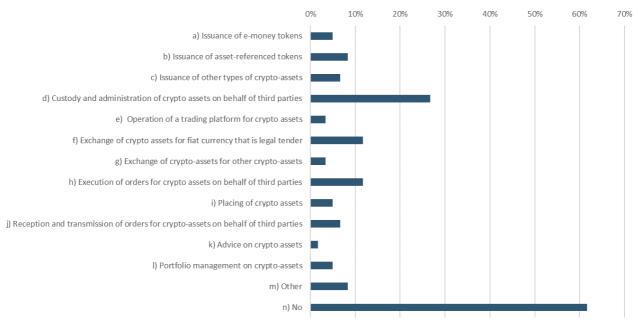


#### Question 25: Autumn 2022 results

Q25 If you are currently using or planning to use in the short-term any of the following Al applications, what is the Al approach applied for each of them?	a) Neural networks	b) Decision Trees/Ra ndom Forest	Regressi	language	Support	f) Probabili stic geograph ical models	g) Other (please specify)	h) Not used / not planned to be used
a) AML/CFT: Identification and verification (including remoteon boarding and digital ID)								
b) AML/CFT: Behaviour / Transaction Monitoring								
c) Fraud detection								
d) Regulatory or supervisory reporting								
e) Creditworthiness assessment/Credit scoring								
f) Monitoring conduct risk								
g) Real-time monitoring of payments, including verifying the identification of payers and payees								
h) Profiling / clustering of clients ortransactions								
i) Robo-advisors for investment advice								
j) Algorithmic trading								
k) Regulatory credit risk modelling								
I) Other risk modelling								
m) Other use cases								
	0%-10% 10%-20% 20%-30% >30%							

#### Question 26: Autumn 2022 result

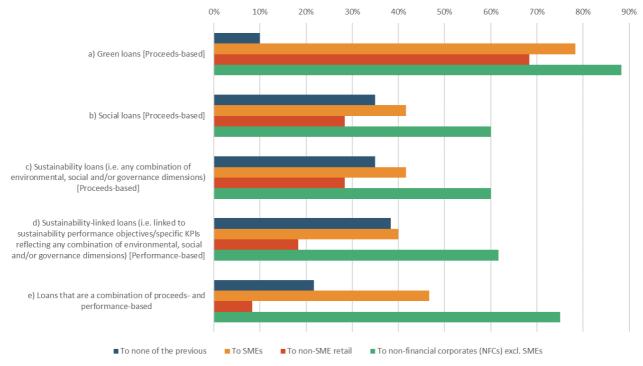
Q26 Are you offering, or do you expect to offer any of the following crypto-asset products and services to retail or wholesale clients over the next 2 years?





## 6. ESG Finance

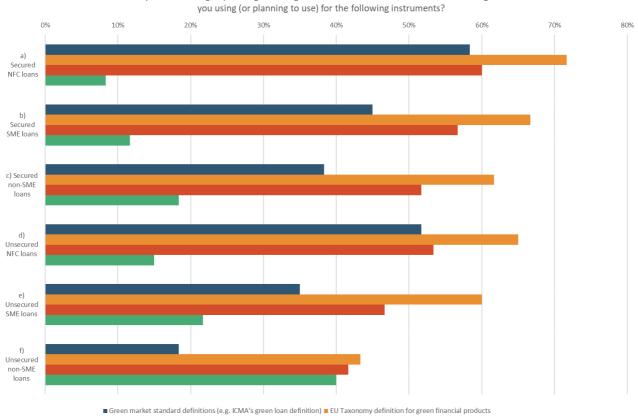
#### Question 27: Autumn 2022 results



Q27 Which if any of the following loans are you offering or planning to offer to your clients?



#### Question 28: Autumn 2022 results



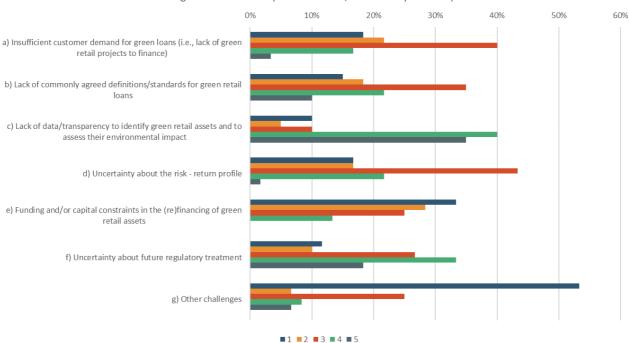
Q28 If you are offering or planning to offer green loans to customers, which definition of 'green' are

Internal green framework definition

• We are not offering (nor planning to offer) this type of green loans



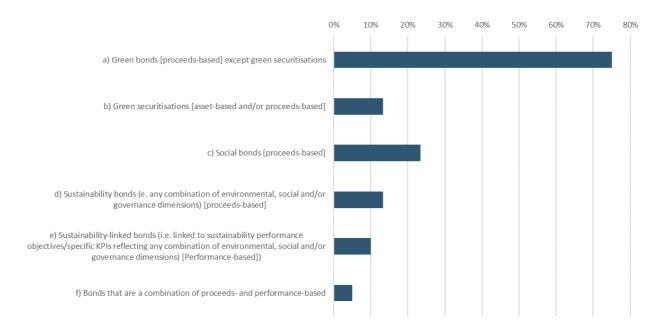
#### Question 29: Autumn 2022 results



Q29 In your opinion, what are the main impediments to the further development of the market for green retail loans? (1-Not relevant, 5-Extremely relevant)

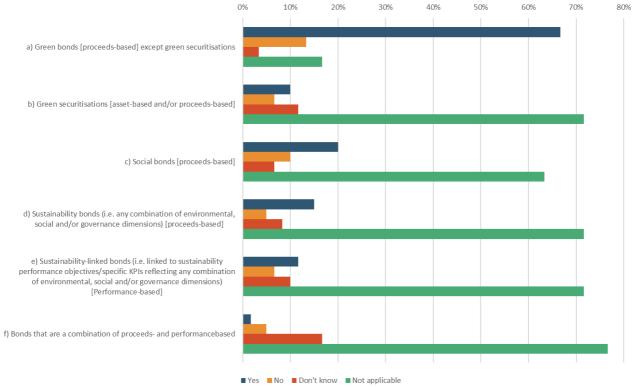
#### Question 30: Autumn 2022 results

#### Q30 Which of the following instruments have you already issued?





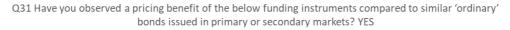
#### Question 31: Autumn 2022 results

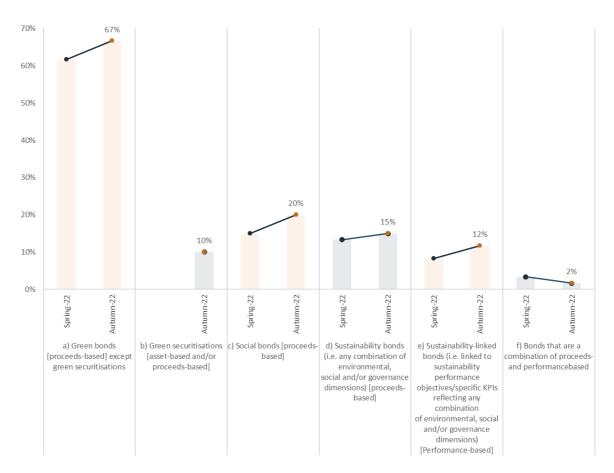


Q31 Have you observed a pricing benefit of the below funding instruments compared to similar 'ordinary' bonds issued in primary or secondary markets?



#### **Question 31: comparison with earlier results**



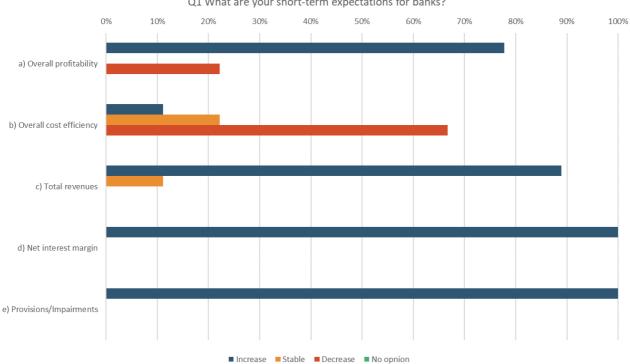




# Market analysts' questionnaire

## 1. Business model / strategy / profitability

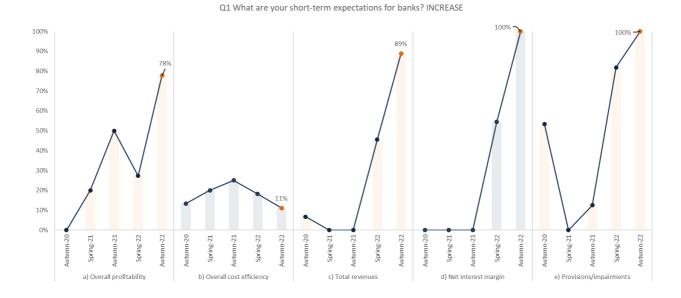
#### **Question 1: Autumn 2022 results**



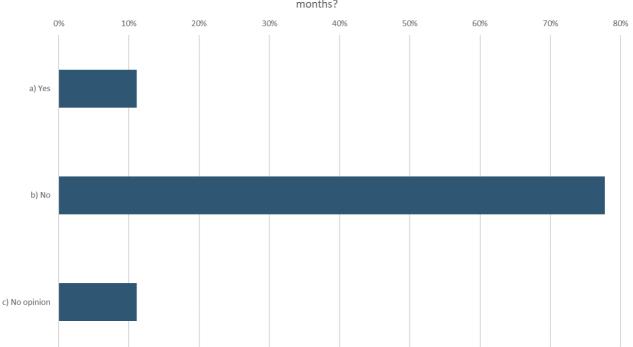
Q1 What are your short-term expectations for banks?



#### **Question 1: Comparison with earlier results**



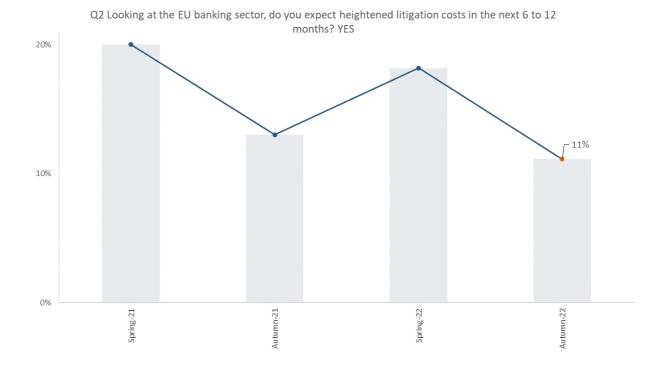
#### **Question 2: Autumn 2022 results**



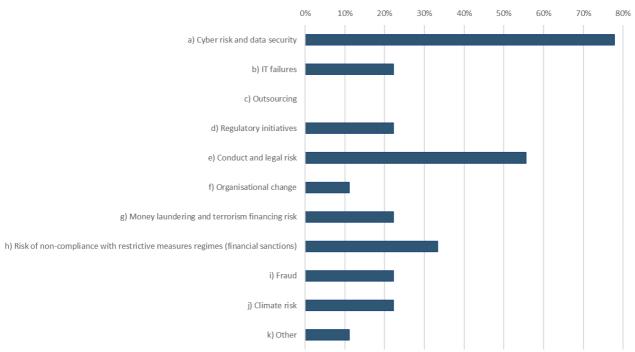
Q2 Looking at the EU banking sector, do you expect heightened litigation costs in the next 6 to 12 months?



#### **Question 2: Comparison with earlier results**



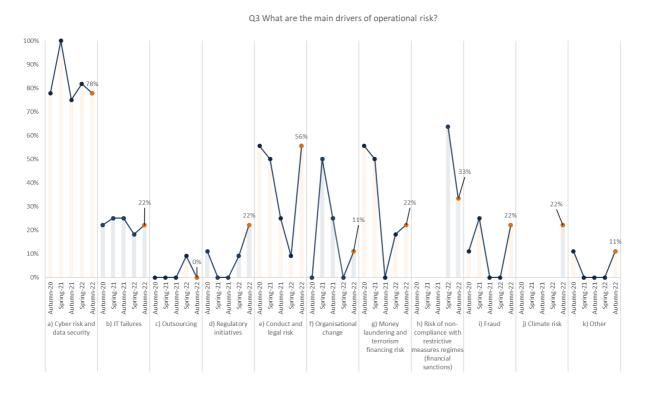
#### **Question 3: Autumn 2022 results**



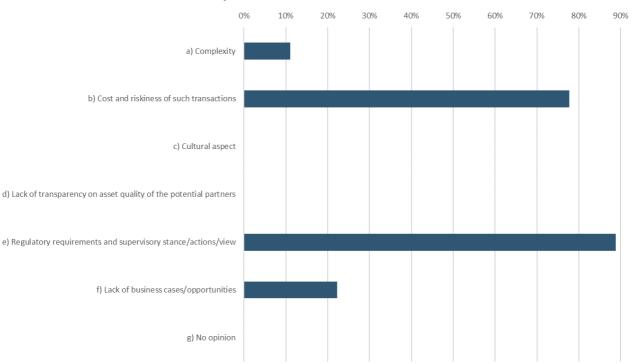
#### Q3 What are the main drivers of operational risk?



#### **Question 3: comparison with earlier results**

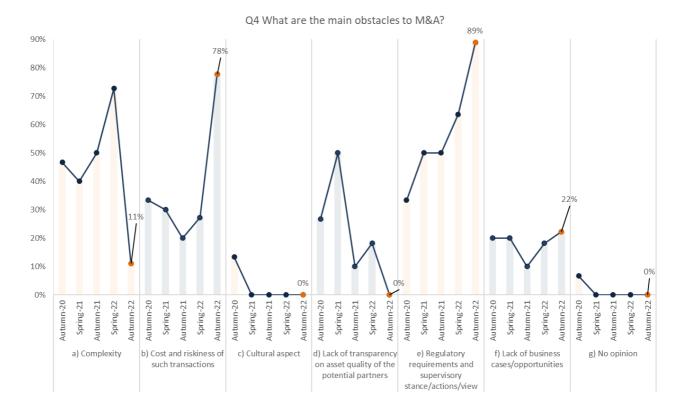


#### Question 4: Autumn 2022 results



#### Q4 What are the main obstacles to M&A?



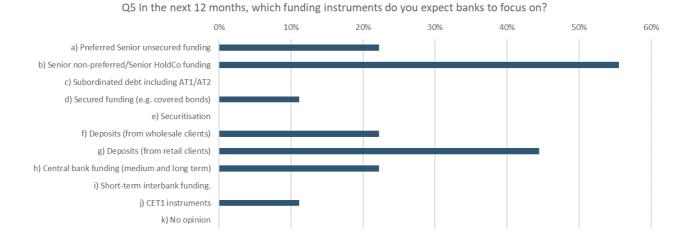


#### **Question 4: comparison with earlier results**



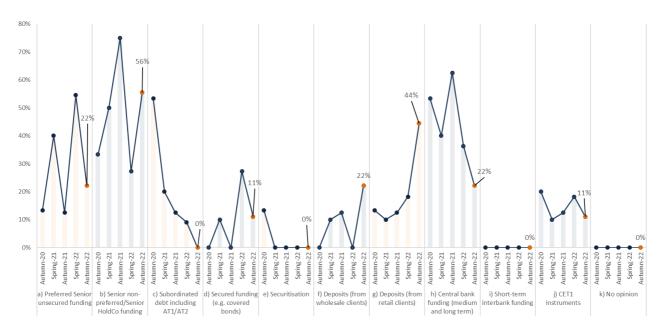
## 2. Funding / Liquidity

#### **Question 5: Autumn 2022 results**



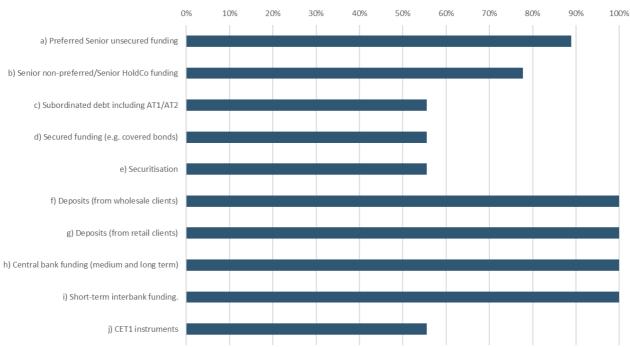
#### **Question 5: Comparison with earlier results**

Q5 In the next 12 months, which funding instruments do you expect banks to focus on?





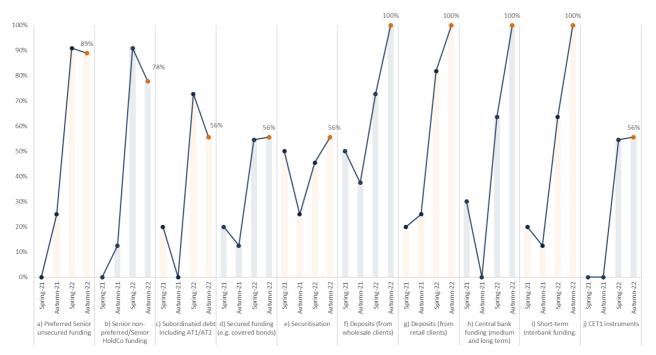
#### **Question 6: Autumn 2022 results**



Q6 In the next 12 months, what do you expect will happen to the cost of the following funding sources? INCREASE

#### **Question 6: comparison with earlier results**

Q6 In the next 12 months, what do you expect will happen to the cost of the following funding sources? INCREASE





#### **Question 7: Autumn 2022 results**



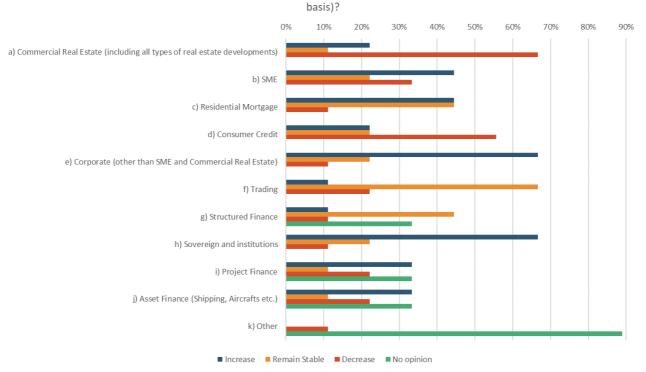
### Q7 In the next 12 months, which are your expectations on the spread advantage of the following labelled instruments?



## 3. Asset composition and quality

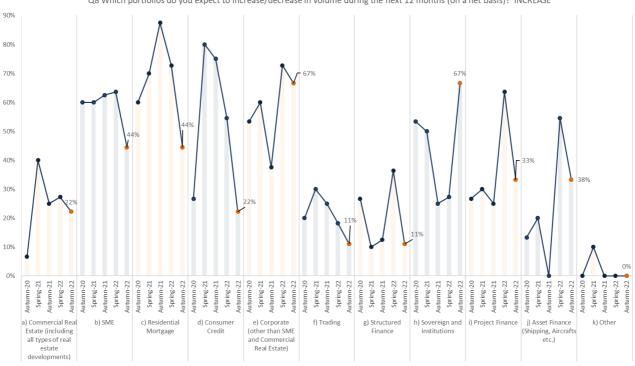
#### **Question 8: Autumn 2022 results**

Q8 Which portfolios do you expect to increase/decrease in volume during the next 12 months (on a net





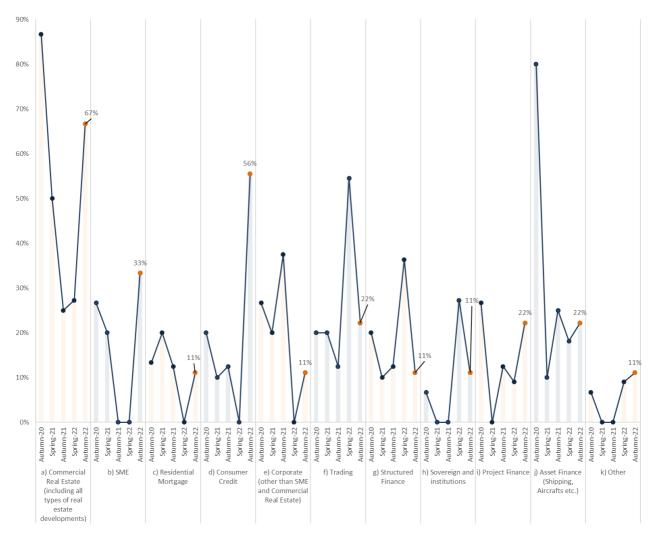
#### **Question 8: comparison with earlier results**



Q8 Which portfolios do you expect to increase/decrease in volume during the next 12 months (on a net basis)? INCREASE

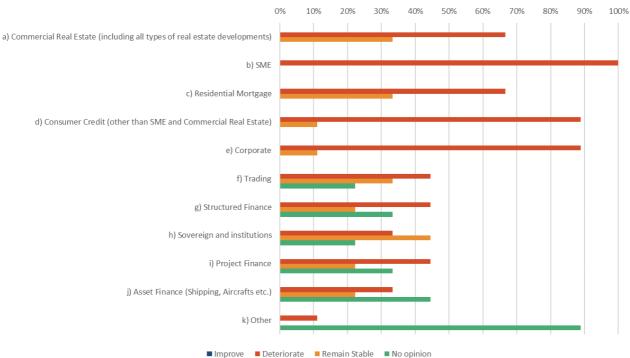


Q8 Which portfolios do you expect to increase/decrease in volume during the next 12 months (on a net basis)? DECREASE





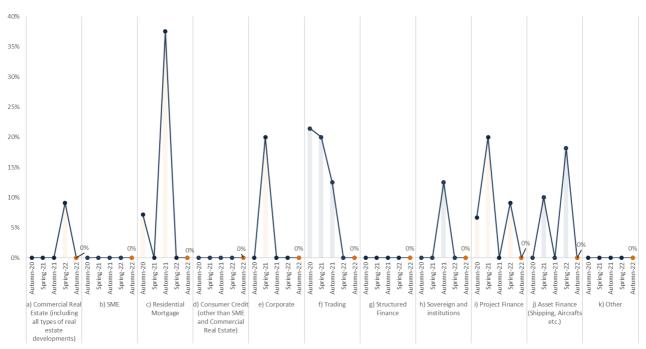
#### **Question 9: Autumn 2022 results**



Q9 Which portfolios do you expect to improve/deteriorate in asset quality in the next 12 months?

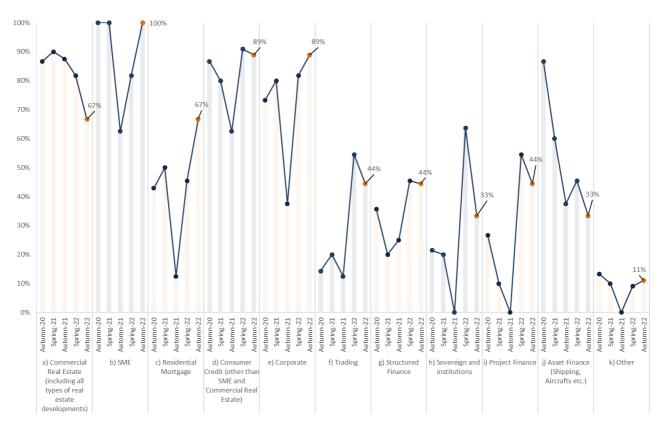


#### **Question 9: comparison with earlier results**



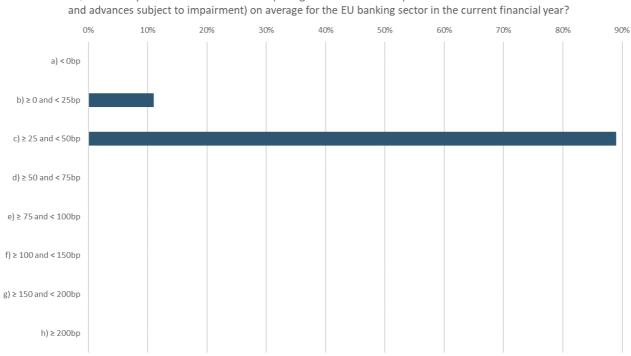
Q9 Which portfolios do you expect to improve/deteriorate in asset quality in the next 12 months? IMPROVE

Q9 Which portfolios do you expect to improve/deteriorate in asset quality in the next 12 months? DETERIORATE





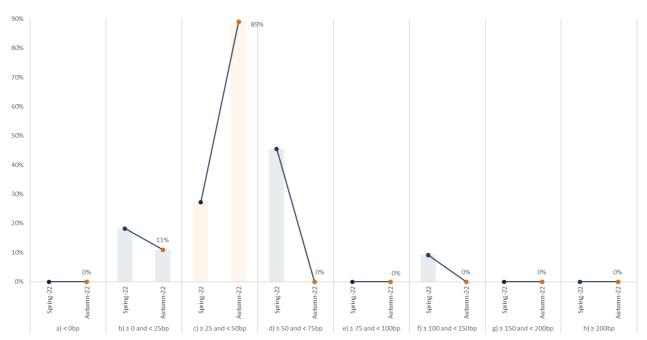
#### Question 10: Autumn 2022 results



Q10 What is your Cost of Risk estimation (change in allowances and provisions as a ratio of total loans

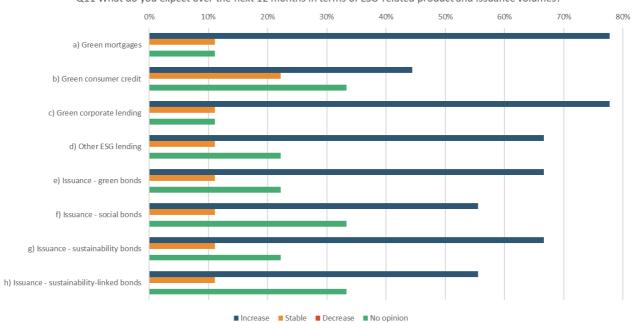
#### **Question 10: comparison with earlier results**







#### Question 11: Autumn 2022 results



Q11 What do you expect over the next 12 months in terms of ESG-related product and issuance volumes?



# Annex: List of EU banks involved in current RAQ survey

Financial Institution	Country
BAWAG Group AG	Austria
Erste Group Bank AG	Austria
RBI	Austria
Belfius Bank SA/NV	Belgium
KBC GROUP	Belgium
First Investment Bank AD	Bulgaria
Bank of Cyprus	Cyprus
Hellenic Bank Public Company Limited	Cyprus
Danske Bank A/S	Denmark
Nykredit Realkredit Group	Denmark
AS LHV Pank	Estonia
Nordea Bank Abp	Finland
OP Financial Group	Finland
BNP PARIBAS S.A.	France
Confederation Nationale Du Credit Mutuel	France
Credit Agricole SA	France
BPCE	France
La Banque Postale	France
Société Générale	France
Bayerische Landesbank	Germany
Commerzbank AG	Germany
Deutsche Bank AG	Germany
DZ BANK AG Deutsche Zentral-Genossenschaftsbank	Germany
Helaba - Landesbank Hessen-Thüringen	Germany
Landesbank Baden-Württemberg	Germany
NORD/LB Norddeutsche Landesbank - Girozentrale	Germany
ALPHA Bank	Greece
Eurobank S.A.	Greece
National Bank of Greece	Greece
Piraeus Financial Holdings S.A.	Greece
OTP Bank PLC	Hungary
Landsbankinn hf.	Iceland
AIB Group Plc	Ireland



#### **Financial Institution**

Country

Bank of Ireland	Ireland
Banca Monte dei Paschi di Siena Spa	Italy
Banco BPM SpA	Italy
BPER Banca S.p.A.	Italy
Intesa Sanpaolo SPA	Italy
UniCredit S.p.A.	Italy
Banque et Caisse d'Epargne de l'Etat, Luxembourg	Luxembourg
Bank of Valletta Plc	Malta
ABN AMRO	The Netherlands
Rabobank Groep Organisation	The Netherlands
ING Groep N.V.	The Netherlands
DNB Bank ASA	Norway
SpareBank 1 SR-Bank ASA	Norway
Bank Pekao S.A.	Poland
PKO Bank Polski S.A.	Poland
Banco Comercial Português	Portugal
CGD - Caixa Geral de Depósitos, S.A.	Portugal
Banca Transilvania	Romania
Nova Ljubljanska banka	Slovenia
Banco de Sabadell, S.A.	Spain
Banco Bilbao Vizcaya Argentaria S.A. (BBVA)	Spain
Bankinter, S.A.	Spain
CaixaBank, S.A.	Spain
Banco Santander, S.A.	Spain
SEB	Sweden
Svenska Handelsbanken AB	Sweden
Swedbank AB	Sweden



# Appendix: Risk Assessment Questionnaire for banks

[added on the following pages]



# EBA Risk Assessment Questionnaire for Banks - Autumn 2 022

Fields marked with \* are mandatory.

## Respondent information

\* Financial Institution

\* Country

#### LEI code of financial institution

Text of 20 to 20 characters will be accepted

#### \* Contact e-mail address

I agree with EBA privacy notice

EBA\_Privacy\_notice\_2022.pdf

Please note the EBA RAQ booklet, which summarises the aggregate results of the survey (<u>see the last version</u>), will again include a list of participating banks (no bank by bank results or similar will be disclosed).

Business model/strategy/profitability

\* Q1 Do you expect an overall increase in your bank's ROE over the next 6 to 12 months?

- a) Yes
- b) Probably yes
- c) Probably no
- 🔘 d) No
- e) 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	N/A
* a) Net interest income	0	0	0	0	0
* b) Net fee and commission income	0	0	0	0	0
* c) Other operating income	0	۲	0	0	0
* d) Operating expenses / costs reduction	0	۲	0	0	0
* e) Impairments	0	۲	$\bigcirc$	0	0
* f) Other	0	0	0	$\bigcirc$	0

#### Q3 How do you expect rising interest rates will affect your P&L over the next 6 to 12 months?

	Increase	Stable	Decrease	No opinion
* a) Overall profitability	0	0	0	0
* b) Net interest income	0	0	0	0
* c) Net fee and commission income	0		0	0
* d) Net trading income	0		0	0
* e) Impairments	0	0	0	0

#### \* Q4 What is your estimated Cost of Equity?

<sup>⊙</sup> a) < 6%  $\bigcirc$  d)  $\geq$  10% and < 12%

- $\bigcirc$  b) ≥ 6% and < 8%  $\bigcirc$  e) ≥ 12%
- $\bigcirc$  c) ≥ 8% and < 10%

#### \* Q5 Which measures are you primarily taking to reduce operating expenses / costs?

at most 3 choice(s)

a) Overhead and staff costs	$\square$ d) Reducing business activities (business lines and locations,
reduction	incl. branches)
b) Outsourcing	e) Increasing automatization and digitalisation

- e) Increasing automatization and digitalisation
- c) Off-shoring or near-shoring
- f) Other

#### \* Q6 Are you considering M&A transactions?

## Q7 What is the share of outstanding loans repricing in less than 12 months for the following portfolios?

	0% -20%	21% -40%	41% -60%	61% -80%	81% -100%
<ul> <li>* a) Commercial Real Estate (including all types of real estate developments)</li> </ul>	O	O	O	O	۲
* b) SME	0	0	0	0	۲
* c) Residential Mortgage	O	0	0	0	0
* d) Consumer Credit	0	0	0	$\bigcirc$	$\odot$
<ul> <li>* e) Corporate (other than SME and Commercial Real Estate)</li> </ul>	0	0	0	0	٢

**Q8 What is the average interest rate fixation period for the following loan portfolios (at origination)?** If the rate is fixed for the whole life of a loan, please, select the bucket corresponding to its maturity. For loans with an interest rate fixation period changing over time (e.g. mortgage at fixed rate over the first five years and then variable with revisions every year), please, select the length of the first fixation period

	≤1 year	>1 year and ≤3 years	>3 years and ≤5 years	>5 years and ≤10 years	>10 years
<ul> <li>* a) Commercial Real Estate (including all types of real estate developments)</li> </ul>	۲	0	0	0	0
* b) SME	0	0	0	0	0
* c) Residential Mortgage	0	0	0	0	0
* d) Consumer Credit	0	0	0	0	0
<ul> <li>* e) Corporate (other than SME and Commercial Real Estate)</li> </ul>	0	0	0	0	0

### Funding/liquidity

#### \* Q9 In the next 12 months, which funding instruments do you intend to focus on?

at most 2 choice(s)

- a) Preferred senior unsecured funding
- b) Senior non-preferred / Senior Holding Company funding
- c) Subordinated debt including AT1/T2
- d) Secured funding (covered bonds)

- g) Deposits (from retail clients)
- h) Central bank funding (medium and longterm)
- i) Short-term interbank funding
- j) CET1 instruments

e) Securitisations

k) Not applicable

f) Deposits (from wholesale clients)

#### \* Q10 What are the main constraints to issue MREL-eligible instruments?

at most 2 choice(s)

- a) Pricing (e.g. spread between MREL-eligible and MREL-ineligible instruments)
- b) No sufficient investor demand due to unattractive risk-return expectations
- c) No sufficient investor demand due to regulatory and supervisory uncertainty
- d) Uncertainty on required MREL amounts and their composition
- e) Uncertainty on eligibility of instruments for MREL
- f) Have already attained sufficient amounts of MREL-eligible instruments
- g) There are no constraints

## \* Q11 Given rising interest rates, which of the following actions are you considering in relation to deposits?

- a) Raise rates for household deposits or current accounts
- b) Raise rates for non-financial corporate deposits or current accounts
- c) Charge lower fees for household deposits or current accounts and related services (e.g. payments or transfer of funds, direct debits, standing orders, annual or monthly fee, issuance fee for debit card, etc)
- d) Charge lower fees for non-financial corporate deposits or current accounts and related services (e. g. payments or transfer of funds, direct debits, standing orders, annual or monthly fee, etc)
- e) None of the above

### Asset composition and quality

## Q12 Which portfolios do you plan to increase/decrease in volume during the next 12 months (on a net basis)?

	Increase	Decrease	Stable	No Opinion
* a) Commercial Real Estate (including all types of real estate developments)	0	0	0	0
* b) SME	0	0	0	0
* c) Residential Mortgage	0	0	0	۲
* d) Consumer Credit	0	0	0	۲
* e) Corporate (other than SME and Commercial Real Estate)	0	0	0	0
* f) Trading	0	0	0	۲
* g) Structured Finance	0	0	0	۲
<ul> <li>* h) Sovereign and institutions</li> </ul>	0	0	O	۲

* i) Project Finance	O	0	0	0
* j) Asset Finance (Shipping, Aircrafts, etc.)	0	0	0	۲
* k) Other	۲	0	0	۲

#### Q13 Which portfolios do you expect to improve/deteriorate in asset quality in the next 12 months?

	Improve	Deteriorate	Remain Stable	No Opinion
<ul> <li>* a) Commercial Real Estate (including all types of real estate developments)</li> </ul>	0	0	0	0
* b) SME	0	0	0	0
* c) Residential Mortgage	0	0	0	0
* d) Consumer Credit	0	0	0	0
* e) Corporate (other than SME and Commercial Real Estate)	O	0	0	0
* f) Trading	0	0	0	0
* g) Structured Finance	0	0	0	0
* h) Sovereign and institutions	0	0	0	0
* i) Project Finance	0	0	0	0
* j) Asset Finance (Shipping, Aircrafts etc.)	0	0	0	0
* k) Other	$\odot$	0	0	O

\* Q14 What is your Cost of Risk (change in allowances and provisions as a ratio of total loans and advances subject to impairment) estimation for the current financial year?

- a) < 0bp</p>
- $\bigcirc$  b) ≥ 0 and < 25bp
- $\bigcirc$  c) ≥ 25 and < 50bp
- $\bigcirc$  d)  $\geq$  50 and < 75bp
- e) ≥ 75 and < 100bp
  </p>
- $\bigcirc$  f) ≥ 100 and < 200bp
- O g) ≥ 200bp

#### \* Q15 How are you planning to treat any "COVID-19 overlay" in your provisioning?

- a) We have already fully or partially released it
- b) We have already fully or partially used for materialised losses
- $^{\odot}\,$  c) We are planning to release it fully or partially in the next 6 to 12 months
- d) We are planning to keep it for now for potential COVID-19 losses materialising in the quarters /years to come

- e) We are planning to release it fully or partially, but intend to recognise a similar amount of overlays for potential losses different from COVID-19 related losses materialising in the quarters/years to come
- f) We had not recognised any management overlay due to COVID-19

#### \* Q16 Have you recognised any provisioning overlays for reasons other than COVID-19?

- a) Yes
- 🔘 b) No

## Conduct, Reputational and Operational risk

# \* Q17 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)?

- $\bigcirc$  a) ≥ 0% and <0.25%
- b) ≥ 0.25% and <0.5%</p>
- $\bigcirc$  c) ≥ 0.5% and <1%
- $\bigcirc$  d) ≥ 1% and <2%
- $\bigcirc$  e) ≥ 2% and <3%
- f) ≥ 3% and <4%
  </p>
- O g) ≥ 4%

#### \* Q18 What are the main drivers of operational risk?

at most 3 choice(s)

a) Cyber risk and data security	g) Money Laundering (ML) and terrorism financing (TF)
b) IT failures	h) Risk of non compliance with applicable restrictive measures
	regimes (financial sanctions)
C) Outsourcing	🔲 i) Fraud
d) Regulatory initiatives	j) Climate risk
e) Conduct and legal risk	k) Other
f) Organisational change	

## Q19 How do you expect your ML and TF risks related to the following products / business lines to evolve in the next 6 to 12 months?

	Increase	Decrease	No impact	Not applicable
* a) Corporate finance	0	0	0	0
* b) Trading and sales	0	0	0	0
* c) Retail banking	0	0	0	0
* d) Commercial banking	0	0	0	0
* e) Payment and settlement	0	0	0	0
<ul> <li>* f) Agency services (e.g. custody services, corporate agency services, corporate trust services)</li> </ul>	O	0	0	0

* g) Asset management	0	0	0	0
<ul> <li>* h) Retail brokerage</li> </ul>	0	0	0	0
∗ i) Other	0	0	0	0

#### Q20 What key ML and TF risks do you expect to face over the coming 6 to 12 months? (1- Low

Significance and 4- High Significance)

	1	2	3	4	Not applicable
* a) Risks associated with customers who are Politically Exposed Persons	۲	0	0	0	0
<ul> <li>* b) Risks associated with customers who are Crypto Asset Services Provider</li> </ul>	۲	0	O	0	0
* c) Risks associated with customers dealing in cryptos	۲	0	0	0	0
<ul> <li>* d) Risks associated with customers whose ownership and control structure is opaque or unduly complex</li> </ul>	۲	0	۲	0	©
<ul> <li>* e) Risks associated with the use of innovative technologies for CDD purposes</li> </ul>	۲	0	O	0	O
<ul> <li>* f) Risks associated with customers' transactions received from, or sent to, jurisdictions where groups committing terrorist offences are known to be operating, or that are known to be sources of terrorist financing</li> </ul>	0	0	0	0	0
<ul> <li>* g) Risks associated with customers' transactions received from, or sent to, jurisdictions that are subject to international sanctions</li> </ul>	0	0	0	0	0
<ul> <li>* h) Risks associated with customers whose activities or leadership are publicly known to be associated with extremism or terrorism</li> </ul>	0	0	0	0	0
<ul> <li>* i) Risks to be used for the laundering of the proceeds of frauds (incl. COVID-related fraud)</li> </ul>	۲	0	0	0	0
<ul> <li>* j) Risks to be used for the laundering of the proceeds of tax crime</li> </ul>	0	0	0	0	0
<ul> <li>* k) Risks to be used for the laundering of the proceeds of corruption</li> </ul>	0	0	0	0	0
* I) Other	۲	۲	۲	۲	۲

\* Q21 How many cyber-attacks that resulted or could have potentially resulted in a "major ICT-related incident"\* have you faced from 1 January to 30 June 2022 (considering the highest level of consolidation)? (\*Major ICT-related incident means an ICT-related incident with a potentially high adverse impact on the network and information systems that support critical functions of the financial entity (article 3

(7) of the European Commission Proposal for a Regulation on digital operational resilience for the financial sector))

- 🔘 a) 0
- b) 1 10
- 🔘 c) 11 20
- 🔘 d) 21 50
- O e) ≥ 51

\* Q22 How many successful cyber-attacks resulting in "major ICT-related incidents"\* have you faced in the period from 1 January to 30 June 2022 (considering the highest level of consolidation)? (\*Majo r ICT-related incident means an ICT-related incident with a potentially high adverse impact on the network and information systems that support critical functions of the financial entity (article 3(7) of the European Commission Proposal for a Regulation on digital operational resilience for the financial sector))

- 🔘 a) 0
- 🔘 b) 1 5
- 🔘 c) 6 10
- 🔘 d) 11 20
- O e) ≥ 21

## FinTech

\*Please note that for the purposes of this questionnaire FinTech is defined as '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).

Q23 For each business line, please indicate how many of your customers are primarily using digital channels for daily banking activities?

	0% -25%	25% -50%	50% -75%	75% -100%	N /A
* a) Retail banking	0	0	0	0	0
<ul> <li>* b) Corporate banking (excluding financial customers)</li> </ul>	O	0	O	0	0

# Q24 What is the level of involvement of your institution with the application of the following technologies?

	In use / launched	Pilot testing	Under development	Under discussion	No activity
* a) Cloud computing, including Edge computing	0	O	O	O	٢
* b) Digital/Mobile wallets	0	0	0	0	۲

<ul> <li>* c) Distributed Ledger Technology, including blockchain</li> </ul>	0	0	0	0	0
* d) Big Data analytics	0	0	0	0	0
* e) Biometrics	0	0	0	0	0
<ul> <li>* f) Artificial Intelligence (including machine learning and natural language processing)</li> </ul>	0	0	0	0	0
* g) Smart contracts	0	0	0	0	0
∗ h) APIs	0	0	0	0	0
* i) Quantum computing	0	۲	0	۲	0

Q25 If you are currently using or planning to use in the short-term any of the following AI applications, what is the AI approach applied for each of them?

	a) Neural networks	b) Decision Trees /Random Forest	c) Regression analysis	d) Natural language processing	e) Support vector machines	f) Probabilistic geographical models	g) Other (please specify)	h) Not used / not planned to be used
<ul> <li>* a) AML/CFT: Identification and verification (including remote onboarding and digital ID)</li> </ul>								
* b) AML/CFT: Behaviour / Transaction Monitoring								
* c) Fraud detection								
* d) Regulatory or supervisory reporting								
<ul> <li>* e) Creditworthiness assessment</li> <li>/Credit scoring</li> </ul>								
* f) Monitoring conduct risk								
* g) Real-time monitoring of payments, including verifying the identification of payers and payees								
<ul> <li>* h) Profiling / clustering of clients or transactions</li> </ul>								
* i) Robo-advisors for investment advice								
* j) Algorithmic trading								
* k) Regulatory credit risk modelling								

* I) Other risk modelling				
* m) Other use cases				

# \* Q26 Are you offering, or do you expect to offer any of the following crypto-asset products and services to retail or wholesale clients over the next 2 years?

- a) Issuance of e-money tokens
- b) Issuance of asset-referenced tokens
- c) Issuance of other types of crypto-assets
- l d) Custody and administration of crypto assets on behalf of third parties
- e) Operation of a trading platform for crypto assets
- f) Exchange of crypto assets for fiat currency that is legal tender
- g) Exchange of crypto-assets for other crypto-assets
- h) Execution of orders for crypto assets on behalf of third parties
- i) Placing of crypto assets
- j) Reception and transmission of orders for crypto-assets on behalf of third parties
- k) Advice on crypto assets
- I) Portfolio management on crypto-assets
- m) Other
- 🔲 n) No

### **ESG** Finance

**Q27** Which if any of the following loans are you offering or planning to offer to your clients? Please note the differentiation between proceeds-based and performance-based products, as to avoid double counting. Please avoid double counting of products already included under other options presented in the question.

	To non- financial corporates (NFCs) excl. SMEs	To SMEs	To non- SME retail	To none of the previous
* a) Green loans [Proceeds-based]				
* b) Social loans [Proceeds-based]				
<ul> <li>* c) Sustainability loans (i.e. any combination of environmental, social and/or governance dimensions) [Proceeds-based]</li> </ul>				
<ul> <li>* d) Sustainability-linked loans (i.e. linked to sustainability performance objectives/specific KPIs reflecting any combination of environmental, social and/or governance dimensions) [Performance-based]</li> </ul>				
* e) Loans that are a combination of proceeds- and performance-based				

Q28 If you are offering or planning to offer green loans to customers, which definition of 'green' are you using (or planning to use) for the following instruments?

	Green market standard definitions (e.g. ICMA's green loan definition)	Internal green framework definition	EU Taxonomy definition for green financial products	We are not offering (nor planning to offer) this type of green loans
* a) Secured NFC loans				
* b) Secured SME loans				
* c) Secured non-SME loans				
* d) Unsecured NFC loans				
* e) Unsecured SME loans				
* f) Unsecured non-SME Ioans				

# Q29 In your opinion, what are the main impediments to the further development of the market for green retail loans? (1-Not relevant, 5-Extremely relevant)

	1	2	3	4	5
* a) Insufficient customer demand for green loans (i.e., lack of green retail projects to finance)	0	0	0	0	0
* b) Lack of commonly agreed definitions/standards for green retail loans	0		۲	۲	0
* c) Lack of data/transparency to identify green retail assets and to assess their environmental impact	0		۲	۲	
* d) Uncertainty about the risk - return profile	0	0	0	0	$\odot$
* e) Funding and/or capital constraints in the (re)financing of green retail assets	0		0		
* f) Uncertainty about future regulatory treatment	0	0	۲	0	$\odot$
* g) Other challenges	0	0	0	0	$\odot$

\*

**Q30 Which of the following instruments have you already issued?** Please note the differentiation between proceeds-based and performance-based products, as to avoid double counting. Please avoid double counting of products already included under other options presented in the question.

- a) Green bonds [proceeds-based] except green securitisations
- b) Green securitisations [asset-based and/or proceeds-based]
- C) Social bonds [proceeds-based]
- d) Sustainability bonds (e. any combination of environmental, social and/or governance dimensions) [proceeds-based]
- e) Sustainability-linked bonds (i.e. linked to sustainability performance objectives/specific KPIs reflecting any combination of environmental, social and/or governance dimensions) [Performance-based])
- f) Bonds that are a combination of proceeds- and performance-based
- g) None of the above

Q31 Have you observed a pricing benefit of the below funding instruments compared to similar 'ordinary' bonds issued in primary or secondary markets? Please note the differentiation between proceeds-based and performance-based products, as to avoid double counting. Please avoid double counting products already included under other options presented in the question.

	Yes	No	Don't know	Not applicable
* a) Green bonds [proceeds-based] except green securitisations	0	۲	0	0
* b) Green securitisations [asset-based and/or proceeds-based]	0	۲	0	0
* c) Social bonds [proceeds-based]	0	۲	0	0
<ul> <li>* d) Sustainability bonds (i.e. any combination of environmental, social and/or governance dimensions) [proceeds-based]</li> </ul>	0	0	0	O
<ul> <li>* e) Sustainability-linked bonds (i.e. linked to sustainability performance objectives/specific KPIs reflecting any combination of environmental, social and/or governance dimensions) [Performance-based]</li> </ul>	0	0	0	0
<ul> <li>* f) Bonds that are a combination of proceeds- and performance- based</li> </ul>	0	0		O



# Appendix: Risk Assessment Questionnaire for market analysts

[added on the following pages]



## EBA Risk Assessment Questionnaire for Market Analysts -Autumn 2022

Fields marked with \* are mandatory.

## Respondent information

\* First Name

\* Last Name

\* Position

\* Company

\* Contact e-mail address

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A. Business model/strategy/profitability

#### Please select your choice for every box.

#### Your response should reflect the degree of agreement to the statement made.

#### Q1 What are your short-term expectations for banks?

	Increase	Stable	Decrease	No opinion
* a) Overall profitability	0	0	0	0
* b) Overall cost efficiency	0	0	0	0
* c) Total revenues	0	0	0	0
* d) Net interest margin	0	0	0	0
* e) Provisions/Impairments	0	O	O	0

# \* Q2 Looking at the EU banking sector, do you expect heightened litigation costs in the next 6 to 12 months?

- a) Yes
- 🔘 b) No
- c) No opinion

#### \* Q3 What are the main drivers of operational risk?

at most 3 choice(s)

🔲 a) Cyber risk and data security	🔲 g) Money laur	ndering and terrorism financing risk
🔲 b) IT failures	h) Risk of non	-compliance with restrictive measures regimes
	(financial sand	ctions)
c) Outsourcing	🔲 i) Fraud	
d) Regulatory initiatives	j) Climate risk	
🔲 e) Conduct and legal risk	k) Other	
🔲 f) Organisational change		
* Q4 What are the main obstacles to	M&A?	
at most 2 choice(s)		
a) Complexity		e) Regulatory requirements and supervisory stance/actions/view
b) Cost and riskiness of such t	ransactions	f) Lack of business cases/opportunities
c) Cultural aspect		g) No opinion
d) Lack of transparency on ass	set quality of the	
potential partners		

## B. Funding/liquidity

\* Q5 In the next 12 months, which funding instruments do you expect banks to focus on?

at most 2 choice(s)

a) Preferred Senior unsecured funding

g) Deposits (from retail clients)

#### b) Senior non-preferred/Senior HoldCo funding h) Central bank funding (medium and long term)

C) Subordinated debt including AT1/AT2

- l d) Secured funding (e.g. covered bonds)
- e) Securitisation

j) CET1 instruments

i) Short-term interbank funding.

- 🔲 k) No opinion
- f) Deposits (from wholesale clients)

## Q6 In the next 12 months, what do you expect will happen to the cost of the following funding sources?

	Increase	Decrease	Remain Stable	No opinion
* a) Preferred Senior unsecured funding	0	0	0	0
<ul> <li>* b) Senior non-preferred/Senior HoldCo funding</li> </ul>	0	0	0	0
* c) Subordinated debt including AT1/AT2	0	0	0	0
* d) Secured funding (e.g. covered bonds)	0	0	0	0
* e) Securitisation	0	0	0	0
* f) Deposits (from wholesale clients)	0	0	0	0
* g) Deposits (from retail clients)	0	0	0	0
<ul> <li>* h) Central bank funding (medium and long term)</li> </ul>	0	0	0	0
* i) Short-term interbank funding.	0	0	0	0
<ul> <li>* j) CET1 instruments</li> </ul>	0	0	0	0

# Q7 In the next 12 months, which are your expectations on the spread advantage of the following labelled instruments?

	Increase	Decrease	Remain stable	No opinion
* a) Green bonds	0	0	0	0
* b) Social bonds	0	0	0	0
* c) Sustainability bonds	0	0	0	0
* d) Sustainability-linked bonds	0	0	0	0

## C. Asset composition & quality

Q8 Which portfolios do you expect to increase/decrease in volume during the next 12 months (on a net basis)?

	Increase	Decrease	Remain stable	No opinion	
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* a) Commercial Real Estate (including all types of real estate developments)	O	O	O	0
* b) SME	0	0	0	0
* c) Residential Mortgage	0	0	0	0
* d) Consumer Credit	0	0	0	0
* e) Corporate (other than SME and Commercial Real Estate)	0	0	O	0
* f) Trading	0	O	0	0
* g) Structured Finance	0	0	0	0
<ul> <li>* h) Sovereign and institutions</li> </ul>	0	0	۲	0
* i) Project Finance	0	0	0	0
* j) Asset Finance (Shipping, Aircrafts etc.)	0	0	0	0
* k) Other	0	0	۲	0

#### Q9 Which portfolios do you expect to improve/deteriorate in asset quality in the next 12 months?

	Improve	Deteriorate	Remain Stable	No opinion
<ul> <li>* a) Commercial Real Estate (including all types of real estate developments)</li> </ul>	0	0	0	0
* b) SME	0	0	0	0
* c) Residential Mortgage	0	0	0	0
<ul> <li>* d) Consumer Credit (other than SME and Commercial Real Estate)</li> </ul>	0	0	O	0
* e) Corporate	0	0	0	0
* f) Trading	0	0	0	0
* g) Structured Finance	0	0	0	0
* h) Sovereign and institutions	0	0	0	0
* i) Project Finance	0	0	0	0
* j) Asset Finance (Shipping, Aircrafts etc.)	0	۲	0	0
* k) Other	O	O	0	0

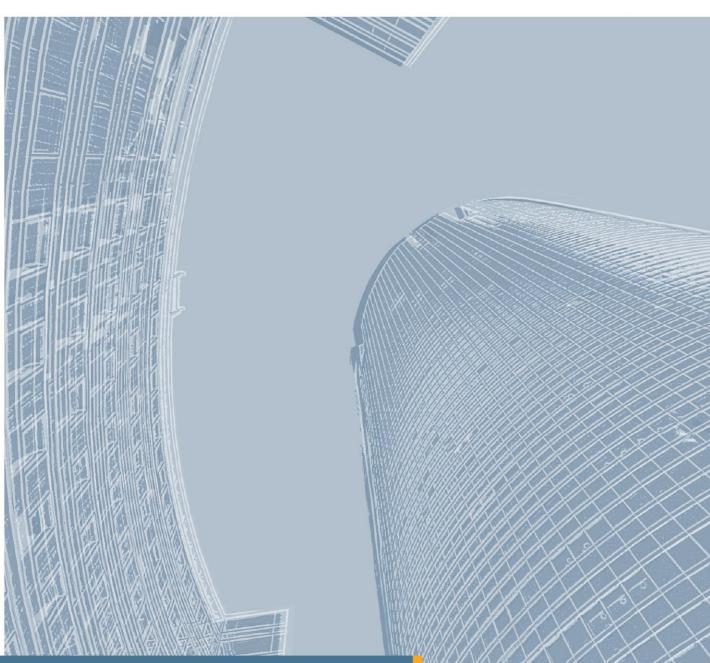
\* Q10 What is your Cost of Risk estimation (change in allowances and provisions as a ratio of total loans and advances subject to impairment) on average for the EU banking sector in the current financial year?

a) < 0bp</p>

- <sup>(©)</sup> b) ≥ 0 and < 25bp
- $\bigcirc$  c) ≥ 25 and < 50bp
- $\bigcirc$  d) ≥ 50 and < 75bp
- e) ≥ 75 and < 100bp</p>
- f) ≥ 100 and < 150bp
- $\bigcirc$  g) ≥ 150 and < 200bp
- h) ≥ 200bp

# Q11 What do you expect over the next 12 months in terms of ESG-related product and issuance volumes?

	Increase	Decrease	Stable	No opinion
* a) Green mortgages	0	0	0	0
* b) Green consumer credit	0	0	0	0
* c) Green corporate lending	0	0	0	0
* d) Other ESG lending	0	0	0	0
* e) Issuance - green bonds	0	0	0	0
* f) Issuance - social bonds	0	0	0	0
* g) Issuance - sustainability bonds	0	0	0	0
<ul> <li>h) Issuance - sustainability-linked bonds</li> </ul>	0	0	O	0



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