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# 2024 EBA DATA COLLECTION FOR CFA ON IFR/IFD

INSTRUCTIONS FOR INVESTMENT FIRMS (VERSION 1.0)

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# Abbreviations

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<b>IFR</b>	Investment firm regulation
<b>IFD</b>	Investment firm directive
<b>Class 1 minus</b>	Class 1 minus investment firms refer to investment firms subject to CRR according to point of Article 1(2) and (5) of IFR
<b>Class 2</b>	Class 2 investment firms refer to investment firms not deemed to be small and non-interconnected Article 12 IFR and are subject to IFR according to Article 11(1) IFR (K-factors)
<b>Class 3</b>	Class 3 investment firms refer to investment firms deemed to be small and non-interconnected under Article 12 IFR and are subject to IFR according to Article 11(2) IFR
<b>EEA</b>	European Economic Area

# 1. Introduction

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1. The Investment Firm Regulation (IFR)<sup>1</sup> and the Investment Firm Directive (IFD) set a new prudential framework for investment firms in the EU. This framework, entered into force on 25 December 2019, is fully applicable since 26 June 2021.
2. In accordance with Article 60 of IFR and with Article 66 of IFD, the Commission is required to submit, by 26 June 2024, two reports to the European Parliament and the Council on the need for a revision of the prudential framework for investment firms.
3. On 1 February 2023, the European Commission sent a Call for Advice (CfA) to provide an evaluation of the new prudential framework for investment firms. In this context, the EBA has launched a data collection exercise to collect all the necessary information to reply to the CfA.
4. This document describes the template data items and gives instructions on how to fill them in. It should be read in conjunction with the IFR, IFD and associated Regulatory Technical Standards (RTS) or Guidelines (GL). **The descriptions of the items in these instructions intend to facilitate the completion of the template and shall not be construed as an official interpretation of the applicable regulation.** If there are cases where the descriptions in this document contradict the requirements prescribed in the regulation or RTS/GL, the latter should prevail.
5. The EBA will treat all individual investment firm data collected in this exercise as strictly confidential and will not attribute them to individual investment firms.
6. The remainder of this document is organised as follows. Section 2 discusses general issues such as the scope, timeline and process of the data collection exercise, as well as the overall structure of the template. Section 3 provides template specific instructions for all worksheets.

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<sup>1</sup> [Regulation \(EU\) 2019/2033 of the European Parliament and of the Council of 27 November 2019 on the prudential requirements of investment firms](#)

## 2. General instructions

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### 2.1 Scope of the exercise

7. The participation in this data collection exercise is voluntary.
8. The EBA expects **EEA investment firms** as defined in point (22) of Article 4(1) of IFR, authorised and supervised under MiFID, to participate in this exercise.<sup>2</sup> Where applicable and unless noted otherwise, data for investment firms shall be reported on an **individual basis**.
9. The EBA further expects **EEA investment firm groups** that would be **subject to prudential consolidation under Article 7 of the IFR** to participate in this exercise. Where applicable and unless noted otherwise, data for investment firm groups shall be reported on a **consolidated basis**.
10. Please note that Union parent investment firms are expected to submit **two** separate templates, one on an individual basis and one on a consolidated basis, respectively. The reporting scope used in each template (i.e. individual or consolidated) should be indicated in the “Input” worksheet.

### 2.2 Timeline

11. Table 1 shows the timeline of the data collection. Investment firms are required to submit the completed templates to their national competent authority (NCA) by **19 July 2024**. Following the data quality assurance, the investment firms would be required to re-submit revised templates to their NCA, addressing any data quality issues identified, by **23 August 2024**.

### 2.3 Process

12. **The EBA will not collect any data directly from investment firms.** Therefore, investment firms should contact their competent authority to discuss how the completed workbooks should be submitted. Competent authorities will forward the relevant data to the EBA, where individual investment firm data will be treated as strictly confidential.
13. Similarly, investment firms should direct all questions related to this data collection to their competent authority.

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<sup>2</sup> Investment firms categorized as Class 1, e.g. undertakings qualified as credit institutions according to Art. 4(1) point 1(b) CRR and authorized according to Art. 8 CRD that are subject to the CRR are not expected to participate in this exercise.

14. Investment firms should specify any instance where they had to deviate from the instructions provided in an additional document.

Table 1 Timeline for the data collection exercise

	<b>Launch of the data collection exercise</b> Distribution of templates and instructions to investment firms
19 July 2024	<b>Deadline for the 1st submission from IFs to NCAs</b> Investment firms to submit templates to the NCAs
26 July 2024	<b>Deadline for the 1st submission from NCAs to EBA</b> NCAs to send first submission to the EBA after NCA data quality assurance
29 July 2024 – 9 August 2024	<b>EBA Data quality assurance</b>
23 August 2024	<b>Deadline for the final submission from IFs to NCAs</b> Investment firms to submit revised templates to the NCAs after resolving any data quality issues
30 August 2024	<b>Deadline for the final submission from NCAs to EBA</b> NCAs to send final submission to the EBA after NCA data quality assurance
13 September 2024	<b>Data freezing</b> No submissions are accepted beyond this date. Submissions between 30 August 2024 and 13 September 2024 will only be accepted on exceptional cases.

## 2.4 Filling in the data

15. Some parts of the exercise are only relevant to certain types of investment firms, depending on their activities, the classification under the IFR and scope of reporting. To facilitate reporting, the template is organised in six types of worksheets, marked with a different colour:

- **Grey colour:** to be completed by all investment firms and investment firm groups;
- **Orange colour:** to be completed by 'Class 2' and 'Class 3' investment firms reporting on an individual basis;
- **Blue colour:** to be completed by 'Class 2' investment firms reporting on an individual basis and subject to RtM K-factors
- **Green colour:** to be completed by 'Class 1 minus' and Class 2 investment firms reporting on an individual basis;
- **Purple colour:** to be completed by 'Class 1 minus' investment firms reporting on an individual basis;
- **Red colour:** to be completed by investment firm groups reporting on a consolidated basis.

16. Table 2 provides an overview of worksheets included in the template and the reporting requirements.

Table 2 Reporting obligations by worksheet

Colour	Worksheet(s)	To be filled in	
		Individual basis	Consolidated basis
Grey	Input	ALL	ALL
Orange	NTB	'Class 2' and 'Class 3' investment firms	NONE
	Crypto assets	'Class 2' and 'Class 3' investment firms	NONE
	MTF and OTF	'Class 2' and 'Class 3' carrying out MiFID service (8) or (9)	NONE
Blue	Risk to markets	'Class 2' investment firms subject to RtM K-factors	NONE
Green	Remuneration	'Class 1 minus' and 'Class 2' investment firms	NONE
Purple	Class 1 minus	'Class 1 minus'	NONE
Red	Prudential conso - Crowdfunding	NONE	ALL
	Prudential conso - Crypto	NONE	ALL

Notes: 'Class 3' investment firms refer to investment firms deemed to be small and non-interconnected under Article 12 IFR and are subject to IFR according to Article 11(2) IFR; 'Class 2' investment firms refer to investment firms not deemed to be small and non-interconnected Article 12 IFR and are subject to IFR according to Article 11(1) IFR (K-factors); 'Class 1 minus' investment firms refer to investment firms subject to CRR according to point of Article 1(2) and (5) of IFR.

17. Data should only be entered in the yellow shaded cells. It is important to note that any modification to the worksheets might render the workbook unusable both for the validation of the results and the subsequent aggregation process.

18. **Where information is not available, the corresponding cell should be left empty. No text such as "na" should be entered in these cells. Also, investment firms must not fill in any arbitrary numbers to avoid error messages or warnings which may be provided by their NCA. However, leaving a cell empty could trigger exclusion from some or all of the analyses if the respective item is required.**

19. Data can be reported in the most convenient currency. The currency which has been used should be recorded in the "Input" worksheet (see Section 3.1). If 1,000 or 1,000,000 currency units are used for reporting, this should also be indicated in this worksheet. When choosing the reporting unit, it should be considered that the worksheet shows all amounts as integers. Unless noted otherwise, **the same currency and unit should be used for all amounts throughout the workbook**, irrespective of the currency of the underlying exposures.

20. Percentages should be reported as decimals and will be converted to percentages automatically. For example, 1% should be entered as 0.01. Where investment firms are required to provide text, investment firms should use English language and avoid revealing their identity in their responses.

21. The EBA is aware that some investment firms might not yet have in place some of the models and/or processes required for the calculations of the requested fields. In such cases, investment firms may provide quantitative data on a “best-efforts” basis. In case of doubt, they should discuss with the relevant national supervisor how to proceed.

## 2.5 Reference date

22. All data should be reported as of **31/12/2023**. Where data at that date is not available, the most recent data should be submitted. In this case, the reference data used should be indicated in the worksheet “Input” (see Section 3.1).

## 2.6 File naming conventions and versioning of the Excel files

23. For easy future reference between IF, NCAs and EBA, the IFs (NCAs) should use the following naming convention of the Excel files before submitting them to the NCAs (EBA):

IF\_<Two-character Iso country code>\_<LEI>\_<IND/CON>\_v0<i>.

where <i> is the version number and <IND/CON> should indicate if the investment firm or investment firm group is submitting data on an individual or consolidated basis.

24. The version number is related to the data provided. It should be set to 1 when a particular Excel file is first submitted to the EBA. In case of resubmissions, the version number should be updated before submitting the revised Excel file to the EBA. A higher version number must be used each time a revised workbook is submitted to the EBA in order to avoid version conflicts.

**25. Please do not add any additional characters, including extra dashes or spaces, in the Excel file names of reporting templates.**

26. For example, an Austrian investment firm submitting for the first time (i.e. version 1) on an individual basis, with an LEI of “ABC123” should have the following name:  
IF\_AT\_ABC123\_IND\_v01.xlsx

27. When a revised version (e.g. version 2) is uploaded for the same investment firm, the following name should be used: IF\_AT\_ABC123\_IND\_v02.xlsx, and so on.

28. The scope of reporting selected in the “Input” worksheet (see below for details) should be aligned with the file naming convention (IND/CON). In other words, where an investment firm has selected “Individual” in the scope of reporting in the “Input” worksheet should use “IND” in its file naming conversion. Likewise, where an investment firm group has selected “Consolidated” in the scope of reporting in the “Input” worksheet should use “CON” in its file naming conversion.

## 2.7 Structure of the Excel template



29. The template consists of 9 worksheets as follows:

- **Input:** collects basic information on the investment firm's identification, reporting data conventions and scope of reporting (individual or consolidated basis).
- **NTB:** collects information on non-trading book and off-balance sheet items.
- **Crypto assets:** collects information on the provision of crypto asset services provided by investment firms.
- **MTF and OTF:** collects information on the volume of activity of MTFs and OTFs.
- **Remuneration:** collects information on identified staff and their level of variable remuneration.
- **Class 1 minus:** collects information on the capital requirements under the IFR/IFD for Class 1 minus investment firms.
- **Risks to Market:** collects information on related to K- factors for risks to market.
- **Prudential Conso – Crowdfunding:** collects information on crowdfunding providers that are part of an investment firm group.
- **Prudential Conso – Crypto assets:** collects information on entities that provide crypto asset services and are part of an investment firm group.

## 3. Template specific instructions

### 3.1 Input

**All investment firms and investment firm groups should complete the “Input” worksheet.**

30. The “Input” worksheet contains information needed to process and interpret the data collection results.

<b>Legal references and instructions</b>
<p><b><u>LEI code</u></b></p> <p>Legal Entity Identifier (LEI) code of the reporting entity.</p> <p>If the LEI code is not available, a national code should be reported.</p>
<p><b><u>Entity name</u></b></p> <p>Name of the reporting entity.</p>
<p><b><u>Country</u></b></p> <p>Country in which the investment firm is authorised under MiFID.</p> <p>In case of a Union parent investment holding companies or a Union parent mixed financial holding companies the country of incorporation.</p>
<p><b><u>Scope of reporting</u></b></p> <p>Scope of consolidation (Individual, Consolidated) in which data are reported.</p>
<p><b><u>Reference date</u></b></p> <p>Date as of which all data are reported in worksheets. Use the format dd/mm/yyyy.</p> <p>Data should be reported as of <b>31/12/2023</b>. Where data at that date is not available, please submit the most recent data and indicate the reference date.</p>
<p><b><u>Reporting currency</u></b></p> <p><b>Three-character</b> ISO code of the currency in which all data are reported (e.g. EUR).</p>
<p><b><u>Reporting unit</u></b></p> <p>Units (single currency units, thousands, millions) in which data are reported.</p>
<p><b><u>Classification</u></b></p> <p>Prudential classification of the investment firm (Class 1 minus, Class 2, Class 3)</p>
<p><b><u>Submission date</u></b></p> <p>Date as of which template is submitted to the NCA. Use the format dd/mm/yyyy.</p>

## 3.2 NTB

**Only Class 2 and Class 3 investment firms reporting on an individual basis should complete the “NTB” worksheet.**

31. The “NTB” worksheet collects information on non-trading book and off-balance sheet items.

### 3.2.1 Panel 1: Non-trading book and off-balance sheet items

32. Panel 1 collects information on investment firm’s exposures in non-trading book and off-balance sheet items.

Rows	Legal references and instructions
0010	<p><b><u>Non-trading book and off-balance sheet items, excluding the firm’s own cash deposits and clients money held on the balance sheet of the investment firm</u></b></p> <p>Carrying amount of non-trading book and off-balance sheet items. These should cover assets and off-balance sheet items not held in the trading book, excluding the firm’s own cash deposits and clients money held on the balance sheet of the investment firm.</p>
0020	<p><b><u>Equity instruments</u></b></p> <p>Carrying amount of equity instruments not held in the trading book.</p>
0030	<p><b><u>Debt instruments</u></b></p> <p>Carrying amount of debt instruments not held in the trading book. This should not include credits or loans granted to clients that need to be reported separately under row 0050.</p>
0040	<p><b><u>Derivatives</u></b></p> <p>Carrying amount of derivatives not held in the trading book.</p>
0050	<p><b><u>Credits or Loans granted to clients</u></b></p> <p>Carrying amount of credits or loans granted to clients not held in the trading book.</p>
0060	<p><b><u>Crypto-assets</u></b></p> <p>Carrying amount of crypto assets not held in the trading book.</p>
0070	<p><b><u>Off-balance sheet items</u></b></p> <p>Carrying amount of off-balance sheet items not held in the trading book.</p>
0080	<p><b><u>Other</u></b></p> <p>Carrying amount of any other non-trading book and off-balance sheet items that could not be classified in any of the categories in rows 0020-0070.</p>
0090	<p><b><u>If "Other", please describe type of items</u></b></p> <p>If a positive value is reported in “Other” (row 0080), please briefly describe the type of items</p>

### 3.2.2 Panel 2: Concentration risk for non-trading book and off-balance sheet items

33. Panel 2 collects information on the concentration risk of exposures calculated for non-trading book and off-balance sheet items only, i.e. not considering any trading book exposures. The reporting required focuses on the five largest positions, if available.

Columns	Legal references and instructions
0110-0150	<p><b><u>Non-trading book and off-balance sheet items</u></b></p> <p>Article 54(2), point (f), of Regulation (EU) 2019/2033.</p> <p>The firm shall report information in relation to the five, if available, largest exposures calculated for non-trading book and off-balance sheet items only, excluding the firm's own cash deposits and clients money held on the balance sheet of the investment firm.</p> <p>The non-trading book and off-balance sheet items reported in this table should coincide with the portion of non-trading book and off-balance sheet items considered in template I 08.06, excluding the firm's own cash deposits and clients money held on the balance sheet of the investment firm.</p>
0110	<p><b><u>Code</u></b></p> <p>The code as part of a row identifier must be unique for each reported entity. For investment firms and insurance undertakings the code shall be the LEI code. For other entities the code shall be the LEI code, or if not available, a national code. The code shall be unique and used consistently across the templates and across time. The code shall always have a value.</p>
0120	<p><b><u>Type of code</u></b></p> <p>The investment firms shall identify the type of code reported in column 0010 as a 'LEI code type' or 'National code type'.</p>
0130	<p><b><u>Name</u></b></p> <p>The name shall correspond to the name of the parent company whenever a group of connected counterparties is reported. In any other case, the name shall correspond to the individual counterparty.</p>
0140	<p><b><u>Group/individual</u></b></p> <p>The firm shall report "1" for the reporting of exposures to individual clients or "2" for the reporting of exposures to groups of connected clients.</p>
0150	<p><b><u>Percentage of exposure value with respect to firm's own funds (non-trading book and off-balance sheet items only)</u></b></p> <p>The firm shall report exposures calculated for non-trading book and off-balance sheet items only at reporting date to each of the counterparties or groups of connected counterparties for which reporting is made expressed as a percentage of eligible capital.</p> <p>The non-trading book and off-balance sheet items reported in this table should coincide with the portion of non-trading book and off-balance sheet items considered in template I 08.06, excluding the firm's own cash deposits and clients money held on the balance sheet of the investment firm.</p> <p>Percentages should be reported as decimals. For example, 1% should be entered as 0.01.</p>

### 3.3 Crypto assets

Only Class 2 and Class 3 investment firms reporting on an individual basis should complete the "Crypto assets" worksheet.

34. The “Crypto assets” worksheet collects information on any crypto asset services provided by investment firms.

### 3.3.1 Panel 1: Provision of crypto asset services

35. Panel 1 collects information on the crypto asset services provided by investment firms under national law.

Row	Legal references and instructions
0010	<p><b><u>Does the investment firm intend to obtain an authorisation as crypto-asset service provider in accordance with Article 63 of MiCAR ?</u></b></p> <p>Please indicate Yes/No if the investment firms intend to obtain an authorisation as crypto-asset service provider in accordance with Article 63 of MiCAR</p>
0020	<p><b><u>Does the investment firm intend to carry out any crypto-asset service in accordance with Article 60(3) of MiCAR (i.e. using its MiFID license and after notifying its NCA) ?</u></b></p> <p>Please indicate Yes/No if the investment firm intend to carry out any crypto-asset service in accordance with Article 60(3) of MiCAR (i.e. using its MiFID license and after notifying its NCA)</p>
0030	<p><b><u>Does the investment firm currently carry out any of the following crypto-asset services: (a) providing custody and administration of crypto-assets on behalf of clients</u></b></p> <p>Please indicate Yes/No if the investment firm currently carries out the service ‘providing custody and administration of crypto-assets on behalf of clients’ under national law which can be deemed equivalent to the crypto-asset service referred to in Article 3(1)(16)(a) MiCAR</p>
0040	<p><b><u>Does the investment firm currently carry out any of the following crypto-asset services: (b) operation of a trading platform for crypto-assets</u></b></p> <p>Please indicate Yes/No if the investment firm currently carries out the service ‘operation of a trading platform for crypto-assets’ under national law which can be deemed equivalent to the crypto-asset service referred to in Article 3(1)(16)(b) MiCAR</p>
0050	<p><b><u>Does the investment firm currently carry out any of the following crypto-asset services: (c) exchange of crypto-assets for funds</u></b></p> <p>Please indicate Yes/No if the investment firm currently carries out the service ‘exchange of crypto-assets for funds’ under national law which can be deemed equivalent to the crypto-asset service referred to in Article 3(1)(16)(c) MiCAR</p>
0060	<p><b><u>Does the investment firm currently carry out any of the following crypto-asset services: (d) exchange of crypto-assets for other crypto-assets</u></b></p> <p>Please indicate Yes/No if the investment firm currently carries out the service ‘exchange of crypto-assets for other crypto-assets’ under national law which can be deemed equivalent to the crypto-asset service referred to in Article 3(1)(16)(d) MiCAR</p>
0070	<p><b><u>Does the investment firm currently carry out any of the following crypto-asset services: (e) execution of orders for crypto-assets on behalf of clients</u></b></p> <p>Please indicate Yes/No if the investment firm currently carries out the service ‘execution of orders for crypto-assets on behalf of clients’ under national law which can be deemed equivalent to the crypto-asset service referred to in Article 3(1)(16)(e) MiCAR</p>
0080	<p><b><u>Does the investment firm currently carry out any of the following crypto-asset services: (f) placing of crypto-assets</u></b></p>

	Please indicate Yes/No if the investment firm currently carries out the service ‘placing of crypto-assets’ under national law which can be deemed equivalent to the crypto-asset service referred to in Article 3(1)(16)(f) MiCAR
0090	<b><u>Does the investment firm currently carry out any of the following crypto-asset services: (g) reception and transmission of orders for crypto-assets on behalf of clients</u></b> Please indicate Yes/No if the investment firm currently carries out the service ‘reception and transmission of orders for crypto-assets on behalf of clients’ under national law which can be deemed equivalent to the crypto-asset service referred to in Article 3(1)(16)(g) MiCAR
0100	<b><u>Does the investment firm currently carry out any of the following crypto-asset services: (h) providing advice on crypto-assets</u></b> Please indicate Yes/No if the investment firm currently carries out the service ‘providing advice on crypto-assets’ under national law which can be deemed equivalent to the crypto-asset service referred to in Article 3(1)(16)(h) MiCAR
110	<b><u>Does the investment firm currently carry out any of the following crypto-asset services: (i) providing portfolio management on crypto-assets</u></b> Please indicate Yes/No if the investment firm currently carries out the service ‘providing portfolio management on crypto-assets’ under national law which can be deemed equivalent to the crypto-asset service referred to in Article 3(1)(16)(i) MiCAR
0120	<b><u>Does the investment firm currently carry out any of the following crypto-asset services: (j) providing transfer services for crypto-assets on behalf of clients</u></b> Please indicate Yes/No if the investment firm currently carries out the service ‘providing transfer services for crypto-assets on behalf of clients’ under national law which can be deemed equivalent to the crypto-asset service referred to in Article 3(1)(16)(j) MiCAR

### 3.3.2 Panel 2: K-factors arising from crypto asset services

36. Panel 2 collects information on the K-factors as if each of the existing K-factors were extended to include any services under national law that can be deemed equivalent to the crypto-asset services (a) to (j) under Article 3(1)(16) of MiCAR. When completing this template, investment firms should only report the extra amounts/requirements that arise **solely** from these crypto-asset services and not any amounts/requirements already applicable under IFR/IFD for MiFID instruments.

Row	Legal references and instructions
0130	<b><u>TOTAL K-FACTOR REQUIREMENT</u></b> Article 15(1) of Regulation (EU) 2019/2033.
0140	<b><u>Risk to client</u></b> Article 16 of Regulation (EU) 2019/2033. The amount reported shall be the sum of rows 0150-0200.
0150	<b><u>Assets under management</u></b> Assets under management arising from carrying out any service under national law that can be deemed equivalent to the crypto-asset services MiCAR Article 3(1)(16)(h) and MiCAR Article 3(1)(16)(i).

	<p>Assets under management shall contain the discretionary portfolio management and non-discretionary advisory arrangements related to crypto assets.</p> <p>The calculation should be performed following the same methodology set out for AUM in Article 15(2) and Article 17 of Regulation (EU) 2019/2033 and Article 3 of Commission Delegated Regulation 2022/25</p>
0160	<p><b><u>Client money held – Segregated</u></b></p> <p>CMH (segregated) arising from carrying out any service under national law which can be deemed equivalent to the crypto-asset services under MiCAR Article 3(1)(16)</p> <p>The calculation should be performed following the same methodology set out for CMH in Article 15(2) and Article 18 of Regulation (EU) 2019/2033 and Article 4 of Commission Delegated Regulation 2022/25</p>
0170	<p><b><u>Client money held – Non – segregated</u></b></p> <p>CMH (non-segregated) arising from carrying out any service under national law which can be deemed equivalent to the crypto-asset services under MiCAR Article 3(1)(16)</p> <p>The calculation should be performed following the same methodology set out for CMH in Article 15(2) and Article 18 of Regulation (EU) 2019/2033 and Article 4 of Commission Delegated Regulation 2022/25</p>
0180	<p><b><u>Assets safeguarded and administered</u></b></p> <p>ASA arising from carrying out arising from carrying out any service under national law that can be deemed equivalent to the crypto-asset services MiCAR Article 3(1)(16)(a).</p> <p>The calculation should be performed following the same methodology set out for ASA in Article 15(2) and Article 19 of Regulation (EU) 2019/2033 and Article 5 of Commission Delegated Regulation 2022/25</p>
0190	<p><b><u>Client orders handled – Cash trades</u></b></p> <p>COH (cash trades) arising from carrying out any service under national law that can be deemed equivalent to the crypto-asset services MiCAR Article 3(1)(16)(b), MiCAR Article 3(1)(16)(e), MiCAR Article 3(1)(16)(f) and MiCAR Article 3(1)(16)(g).</p> <p>The calculation should be performed following the same methodology set out for COH in Article 15(2) and Article 20(1) and Article 20(2), point (a), of Regulation (EU) 2019/2033 and Article 6, Article 7 and Article 8 of Commission Delegated Regulation 2022/25</p>
0200	<p><b><u>Client orders handled – Derivatives Trades</u></b></p> <p>COH (derivative trades) arising from carrying out any service under national law that can be deemed equivalent to the crypto-asset services MiCAR Article 3(1)(16)(b), MiCAR Article 3(1)(16)(e), MiCAR Article 3(1)(16)(f) and MiCAR Article 3(1)(16)(g).</p> <p>The calculation should be performed following the same methodology set out for COH in Article 15(2) and Article 20(1) and Article 20(2), point (b), of Regulation (EU) 2019/2033 and Article 6, Article 7 and Article 9 of Commission Delegated Regulation 2022/25</p>
0210	<p><b><u>Risk to market</u></b></p> <p>Article 21(1) of Regulation (EU) 2019/2033.</p> <p>The amount reported shall be the sum of rows 0220 – 0230.</p>
0220	<p><b><u>K-Net positions risk requirement</u></b></p>

	<p>K-NPR arising from carrying out any service under national law which can be deemed equivalent to the crypto-asset services under MiCAR Article 3(1)(16)(c) and MiCAR Article 3(1)(16)(d), whether for itself or on behalf of a client.</p> <p>The calculation should be performed following the same methodology set out for K-NPR in Article 22 of Regulation (EU) 2019/2033</p>
0230	<p><b><u>Clearing margin given</u></b></p> <p>CMG arising from carrying out any service under national law which can be deemed equivalent to the crypto-asset services under MiCAR Article 3(1)(16)(c) and MiCAR Article 3(1)(16)(d), whether for itself or on behalf of a client.</p> <p>The calculation should be performed following the same methodology set out for CMG in Article 23(2) of Regulation (EU) 2019/2033.</p>
0240	<p><b><u>Risk to firm</u></b></p> <p>Article 24 of Regulation (EU) 2019/2033.</p> <p>The amount reported shall be the sum of rows 0250 – 0280.</p>
0250	<p><b><u>Trading counterparty default</u></b></p> <p>TCD arising from carrying out any service under national law which can be deemed equivalent to the crypto-asset services under MiCAR Article 3(1)(16)(c) and MiCAR Article 3(1)(16)(d), whether for itself or on behalf of a client.</p> <p>The calculation should be performed following the same methodology set out for TCD Article 26 and Article 24 of Regulation (EU) 2019/2033.</p>
0260	<p><b><u>Daily trading flow – Cash trades</u></b></p> <p>DTF (cash trades) arising from carrying out any service under national law which can be deemed equivalent to the crypto-asset services under MiCAR Article 3(1)(16)(c) and MiCAR Article 3(1)(16)(d), whether for itself or on behalf of a client.</p> <p>The calculation should be performed following the same methodology set out for DTF in Article 33(2), point (a), of Regulation (EU) 2019/2033 and Article 10 of Commission Delegated Regulation 2022/25</p> <p>For the purposes of K-factor requirement calculation, investment firms shall report by applying the coefficient of Article 15(2) of Regulation (EU) 2019/2033.</p> <p>In the event of stressed market conditions, in accordance with Article 15(5), point (c), of Regulation (EU) 2019/2033, investment firms shall apply an adjusted coefficient as specified in Article 1(1), point (a), of the RTS to specify adjustments to the K-DTF coefficients.</p>
0270	<p><b><u>Daily trading flow – Derivative trades</u></b></p> <p>DTF (derivative trades) arising from carrying out any service under national law which can be deemed equivalent to the crypto-asset services under MiCAR Article 3(1)(16)(c) and MiCAR Article 3(1)(16)(d), whether for itself or on behalf of a client.</p> <p>The calculation should be performed following the same methodology set out for DTF in Article 33(2), point (b), of Regulation (EU) 2019/2033 and Article 11 of Commission Delegated Regulation 2022/25</p> <p>For the purposes of the K-factor requirement calculation, investment firms shall report by applying the coefficient of Article 15(2) of Regulation (EU) 2019/2033.</p>



	In the event of stressed market conditions, in accordance with Article 15(5), point (c), of Regulation (EU) 2019/2033, investment firms shall apply an adjusted coefficient as specified in Article 1(1), point (b), of the RTS to specify adjustments to the K-DTF coefficients.
0280	<p><b><u>K-Concentration risk requirement</u></b></p> <p>K-CON arising from carrying out any service under national law which can be deemed equivalent to the crypto-asset services under MiCAR Article 3(1)(16)(c) and MiCAR Article 3(1)(16)(d), whether for itself or on behalf of a client.</p> <p>The calculation should be performed following the same methodology set out for K-CON Article 37(2), Article 39 and Article 24 of Regulation (EU) 2019/2033.</p>

Columns	Legal references and instructions
0010	<p><b><u>Factor amount</u></b></p> <p>Investment firms shall report the amount, which corresponds to each of the factors, before multiplying each factor by the corresponding coefficient.</p>
0020	<p><b><u>K-Factor requirement</u></b></p> <p>Shall be calculated in accordance with Article 16, 21 and 24 of Regulation (EU) 2019/2033.</p>

### 3.4 MTF and OTF

**Only investment firms reporting on an individual basis and carrying out the MiFID activities (8) operation of an MTF and/or (9) operation of an OTF should complete the “MTF and OTF” worksheet.**

37. The amounts reported in rows 0010-0060 should be mutually exclusive.

Row	Legal references and instructions
0010	<p><b><u>Client orders handled arising from MiFID activities (8) and (9) only – Cash Trades</u></b></p> <p>Article 15(2) and article 20(1) and Article 20(2), point (a), of Regulation (EU) 2019/2033 and Article 6, Article 7 and Article 8 of Commission Delegated Regulation 2022/25</p> <p>This should only capture client orders handled (cash trades) arising from MiFID activities (8) operation of an MTF and/or (9) operation of an OTF</p>
0020	<p><b><u>Client orders handled arising from MiFID activities (8) and (9) only - Derivatives Trades</u></b></p> <p>Article 15(2) and Article 20(1) and Article 20(2), point (b), of Regulation (EU) 2019/2033 and Article 6, Article 7 and Article 9 of Commission Delegated Regulation 2022/25</p> <p>This should only capture client orders handled (derivatives trades) arising from MiFID activities (8) operation of an MTF and/or (9) operation of an OTF</p>
0030	<p><b><u>Daily trading flow arising from MiFID activities (8) and (9) only - Cash trades</u></b></p> <p>The daily trading flow factor shall be calculated in accordance with Article 33(2), point (a), of Regulation (EU) 2019/2033 and Article 10 of Commission Delegated Regulation 2022/25.</p> <p>This should only capture daily trading flow (cash trades) arising from MiFID activities (8) operation of an MTF and/or (9) operation of an OTF.</p>

	<p>For the purposes of K-factor requirement calculation, investment firms shall report by applying the coefficient of Article 15(2) of Regulation (EU) 2019/2033</p> <p>In the event of stressed market conditions, in accordance with Article 15(5), point (c), of Regulation (EU) 2019/2033, investment firms shall apply an adjusted coefficient as specified in Article 1(1), point (a), of the RTS to specify adjustments to the K-DTF coefficients.</p>
0040	<p><b><u>Daily trading flow arising from MiFID activities (8) and (9) only - Derivatives trades</u></b></p> <p>The daily trading flow factor shall be calculated in accordance with Article 33(2), point (b) of Regulation (EU) 2019/2033 and Article 11 of Commission Delegated Regulation 2022/25</p> <p>This should only capture daily trading flow (derivative trades) arising from MiFID activities (8) operation of an MTF and/or (9) operation of an OTF.</p> <p>For the purposes of the K-factor requirement calculation, investment firms shall report by applying the coefficient of Article 15(2) of Regulation (EU) 2019/2033.</p> <p>In the event of stressed market conditions, in accordance with Article 15(5), point (c), of Regulation (EU) 2019/2033, investment firms shall apply an adjusted coefficient as specified in Article 1(1), point (b), of the RTS to specify adjustments to the K-DTF coefficients.</p>
0050	<p><b><u>MTF and OTF – Cash trades</u></b></p> <p>For the potential new K-factor for MTF and OTF, an investment firm should calculate the total amount of sold interest in financial instruments (cash trades) in the system in a way that results in a contract in accordance with Title II of MiFID related to operating the MTF or OTF (Article 4(1)(22) and Article 4(1)(23) of MiFID).</p> <p>The calculation should be performed following the same methodology set out for COH in Article 20 of the IFR ‘Article 20 Measuring COH for the purpose of calculating K-COH’ and Article 6, Article 7 and Article 8 of Commission Delegated Regulation 2022/25.</p> <p>To avoid double counting, the calculation should take into account <u>only</u> the sold amount.</p>
0060	<p><b><u>MTF and OTF – Derivative trades</u></b></p> <p>For the potential new K-factor for MTF and OTF, an investment firm should calculate the total amount of sold interest in financial instruments (derivative trades) in the system in a way that results in a contract in accordance with Title II of MiFID related to operating the MTF or OTF (Article 4(1)(22) and Article 4(1)(23) of MiFID).</p> <p>The calculation should be performed following the same methodology set out for COH in Article 20 of the IFR ‘Article 20 Measuring COH for the purpose of calculating K-COH’ and Article 6, Article 7 and Article 8 of Commission Delegated Regulation 2022/25.</p> <p>To avoid double counting, the calculation should take into account <u>only</u> the sold amount.</p>

Columns	Legal references and instructions
0010	<p><b><u>Factor amount</u></b></p> <p>Investment firms shall report the amount, which corresponds to each of the factors, before multiplying each factor by the corresponding coefficient.</p>
0020	<p><b><u>K-Factor requirement</u></b></p> <p>Shall be calculated in accordance with Article 16, 21 and 24 of Regulation (EU) 2019/2033.</p>

## 3.5 Risks to Market

**Only Class 2 investment firms reporting on an individual basis and subject to K-RtM should complete the “Risks to Market” worksheet.**

38.The “Risks to Market” template collects information on the Risk to Market.

### 3.5.1 Panel 1: FRTB and CVA

39.Panel 1 collects information on the conditions for using simplified methods under FRTB and CVA.

Rows	Legal references and instructions
0010	<p><b><u>Size of the on- and off-balance-sheet business subject to market risk (Article 325a of CRR2)</u></b></p> <p>The size of their on- and off-balance-sheet business subject to market risk as defined in Article 325a(2) of CRR2</p>
0020	<p><b><u>Size of the on- and off-balance-sheet derivative business (Article 273a of CRR2)</u></b></p> <p>The size of their on- and off-balance-sheet business that is subject to market as defined in Article 273a(3) of CRR2</p>

### 3.5.2 Panel 2: K-CMG

**Only Class 2 investment firms reporting on an individual basis and subject to K-CMG should complete this Panel.**

40.Panel 2 collects information on the adequacy of the K-CMG capital requirements, i.e. how many times the K-CMG requirements were not enough to cover the losses of the portfolios associated with it.

Columns	Legal references and instructions
0010-0050	<p><b><u>All portfolios subject to K-CMG</u></b></p> <p>The firm shall report information in relation to all portfolios subject to K-CMG</p>
0010	<p><b><u>Size of the on- and off-balance-sheet business subject to K-CMG</u></b></p> <p>The size of their on- and off-balance-sheet business subject to K-CMG calculated following the same methodology as in Article 325a(2) of CRR2</p>
0020	<p><b><u>July 2021 - December 2021: Number of daily overshootings within the period</u></b></p> <p>The firm shall count the number of daily overshootings over the period July 2021 (or from the date for which it has received the authorisation to use K-CMG, if later) to December 2021 on the basis of actual changes in the portfolio's value and the amount of K-CMG. An overshooting is a one-day negative change (loss) in the portfolio's value that exceeds the related K-CMG amount on that day. In other words, the investment firms should provide how many times the K-CMG requirements were not enough to cover the losses of the portfolios associated with it, i.e. the losses exceed the K-CMG requirements.</p>
0030	<p><b><u>July 2021 - December 2021: Number of months covered within the period</u></b></p> <p>The firm shall report the number of months considered in the calculation of the number of daily overshootings. By default, the full period of July 2021 to December 2021 (i.e. 6)</p>

	should be reported unless the firm has received an authorisation to use K-CMG at a later date, in which case the number of months should be calculated as the difference between December 2021 and the authorisation date.
0040	<p><b><u>January 2022 - December 2022: Number of daily overshootings within the period</u></b></p> <p>The firm shall count the number of daily overshootings over the period January 2022 (or from the date for which it has received the authorisation to use K-CMG, whichever is earlier) to December 2022 on the basis of actual changes in the portfolio's value and the amount of K-CMG. An overshooting is a one-day negative change (loss) in the portfolio's value that exceeds the related K-CMG amount on that day. In other words, the investment firms should provide how many times the K-CMG requirements were not enough to cover the losses of the portfolios associated with it, i.e. the losses exceed the K-CMG requirements.</p>
0050	<p><b><u>January 2022 - December 2022: Number of months covered within the period</u></b></p> <p>The firm shall report the number of months considered in the calculation of the number of daily overshootings. By default, the full period of January 2022 to December 2022 (i.e. 12) should be reported unless the firm has received an authorisation to use K-CMG at a later date, in which case the number of months should be calculated as the difference between December 2022 and the authorisation date.</p>

### 3.5.3 Panel 3: TSA

**Only Class 2 investment firms reporting on an individual basis and subject to K-DTF should complete this Panel.**

41. Panel 3 collects information on the own funds requirements for Operational Risk under the Standardised Approach for investment firms subject to K-DTF.

Rows	Legal references and instructions
0040	<p><b><u>Standardised approach (TSA) - TRADING AND SALES (TS) ONLY</u></b></p> <p>Own funds requirements in accordance with Articles 317 and 318 CRR for Operational Risk under the Standardised Approach (TSA) <b>for the business line “Trading and sales” only.</b></p> <p>Under the Standardised Approach, institutions shall divide their activities into the business lines set out in Table 2 of Article 317 (4) CRR and in accordance with the principles set out in Article 318. <b>Only the activities under the ‘Trading and sales’ business line should be considered for the calculation of the TSA own fund requirements reported in this cell.</b></p> <p>Investment firms shall calculate the own funds requirement for operational risk as the average over three years of the sum of the annual own funds requirements of ‘Trading and sales’ business line referred to in Table 2 of Article 317 (4) CRR. The annual own funds requirement of the ‘Trading and sales’ business line is equal to the product of the corresponding beta factor referred to in that Table and the part of the relevant indicator mapped to the ‘Trading and sales’ business line.</p> <p>For more details on the calculation, see Article 316 and Article 317 CRR.</p>

### 3.6 Remuneration

**Only Class 1 minus and Class 2 investment firms reporting on an individual basis should complete the “Remuneration” worksheet.**

The “Remuneration” worksheet collects information on the number of identified staff and their level of variable remuneration.

Row	Legal references and instructions
0010	<p><b><u>Is the investment firm subject to IFD or CRD remuneration requirements</u></b></p> <p>Please indicate if the investment firm is subject to remuneration requirements under IFD in line with Article 25 IFD or CRD in line with Article 2(2) of IFD</p>
0020	<p><b><u>Number of staff (individual level)</u></b></p> <p>Total number of staff, including the members of the management body counted on a headcount basis</p>
0030	<p><b><u>Number of identified staff (individual level)</u></b></p> <p>Headcount of staff that has a material impact on the risk profile of the investment firm or the assets it manages as identified under the Commission Delegated Regulation (EU) 2021/2154 (where the investment firm applies the IFD remuneration requirements) or Commission Delegated Regulation (EU) 2021/923 (where the investment firm applies the CRD remuneration requirements).</p>
0040	<p><b><u>of which: number of identified staff with a variable remuneration that does not exceed EUR 50 000 and does not represent more than one fourth (IFD threshold) of that individual’s total annual remuneration (please provide this information independent of the fact that your institution is subject to IFD or CRD)</u></b></p> <p>Number of identified staff with variable remuneration that does not exceed EUR 50 000 and does not represent more than one fourth (IFD threshold) of that individual’s total annual remuneration.</p> <p>The information should be reported by all investment firms irrespective of whether they are subject to IFD or CRD.</p>
0050	<p><b><u>of which: number of identified staff with a variable remuneration that does not exceed EUR 50 000 and does not represent more than one third (CRD threshold) of that individual’s total annual remuneration (please provide this information independent of the fact that your institution is subject to IFD or CRD)</u></b></p> <p>Number of identified staff with variable remuneration that does not exceed EUR 50 000 and does not represent more than one third (CRD threshold) of that individual’s total annual remuneration.</p> <p>The information should be reported by all investment firms irrespective of whether they are subject to IFD or CRD.</p>
0060	<p><b><u>Average value of on and off-balance sheet assets is on average equal over the four-year period immediately preceding the last financial year</u></b></p> <p>Average value of its on and off - balance sheet assets over the four - year period immediately preceding the given financial year calculated as per Article 32(4)(a) IFD</p>

0070	<p><b><u>The firm has established a remuneration committee</u></b></p> <p>Please indicate (Yes/No) if the investment firm has established a remuneration committee</p>
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### 3.7 Class 1 minus

**Only Class 1 minus investment firms reporting on an individual basis should complete the “Class 1 minus” worksheet.**

42. The “Class 1 minus” worksheet collects information on the capital requirements under the IFR/IFD for Class 1 minus investment firms, as if those have been subject to the IFR capital requirements instead of the CRR.

Row	Legal references and instructions
0010	<p><b><u>Own fund requirement</u></b></p> <p>Non entry cell.</p> <p>Article 11(1) of Regulation (EU) 2019/2033.</p> <p>The amount shall be the amount without application of Article 57(3), (4) or (6) of Regulation (EU) 2019/2033.</p> <p>The amount to be reported in this row shall be the maximum amount reported in rows 0020, 0030 and 0040.</p>
0020	<p><b><u>Permanent minimum capital requirement</u></b></p> <p>Article 14 of Regulation (EU) 2019/2033</p> <p>The amount shall be the amount without application of Article 57(3), (4) or (6) of Regulation (EU) 2019/2033.</p>
0030	<p><b><u>Fixed overhead requirement</u></b></p> <p>Article 13 of Regulation (EU) 2019/2033.</p> <p>The amount shall be the amount without application of Article 57(3), (4) or (6) of Regulation (EU) 2019/2033.</p>
0040	<p><b><u>Total K-Factor Requirement</u></b></p> <p>Article 15 of Regulation (EU) 2019/2033.</p> <p>The amount shall be the amount without application of Article 57(3), (4) or (6) of Regulation (EU) 2019/2033.</p>

### 3.8 Prudential conso – Crowdfunding

**Only investment firm groups reporting on a consolidated basis should complete the “Prudential conso – Crowdfunding” worksheet.**

**The information should be submitted only once by the Union parent of the investment firm group.**

43. The worksheet “Prudential conso – Crowdfunding” collects information on crowdfunding services providers that are part of the investment firm group.

Column	Legal references and instructions
0010	<b><u>Entity name</u></b> Name of investment firm.
0020	<b><u>LEI code</u></b> LEI code of investment firm.  If the LEI code is not available, a national code should be reported. The code shall be unique and used consistently across the template. The code shall always have a value.
0030	<b><u>Country</u></b> Country of establishment of the entity
0040	<b><u>Type of ownership</u></b> Please select the type of ownership according to Article 2 of the RTS on prudential consolidation of investment firm groups
0050	<b><u>Facilitation of granting of loans</u></b> Please indicate Yes/No if the entity carries out the crowdfunding service of facilitation of granting loans as per Article 2(1)(a)(i) of REGULATION (EU) 2020/1503
0060	<b><u>Placing without a firm commitment basis of transferable securities and admitted instruments for crowdfunding purposes issued by project owners or a special purpose vehicle, and the reception and transmission of client orders in relation to those transferable securities and admitted instruments for crowdfunding purposes</u></b> Please indicate Yes/No if the entity carries out the crowdfunding service of placing without a firm commitment basis of transferable securities and admitted instruments for crowdfunding purposes issued by project owners or a special purpose vehicle, and the reception and transmission of client orders in relation to those transferable securities and admitted instruments for crowdfunding purposes as per Article 2(1)(a)(ii) of REGULATION (EU) 2020/1503
0070	<b><u>of which: Placing without a firm commitment basis of transferable securities</u></b> Please indicate Yes/No if the entity carries out the crowdfunding service of placing without a firm commitment basis of transferable securities as per Article 2(1)(a)(ii) of REGULATION (EU) 2020/1503
0080	<b><u>of which: reception and transmission of client orders in relation to those transferable securities</u></b> Please indicate Yes/No if the entity carries out the crowdfunding service of the reception and transmission of client orders in relation to those transferable securities as per Article 2(1)(a)(ii) of REGULATION (EU) 2020/1503
0090	<b><u>of which: Placing without a firm commitment basis of admitted instruments for crowdfunding purposes issued by project owners or a special purpose vehicle</u></b> Please indicate Yes/No if the entity carries out the crowdfunding service of placing without a firm commitment basis of admitted instruments for crowdfunding purposes issued by project owners or a special purpose vehicle as per Article 2(1)(a)(ii) of REGULATION (EU) 2020/1503
0100	<b><u>of which: reception and transmission of client orders in relation to those admitted instruments for crowdfunding purposes issued by project owners or a special purpose vehicle</u></b>

	Please indicate Yes/No if the entity carries out the crowdfunding service of the reception and transmission of client orders in relation to those admitted instruments for crowdfunding purposes as per Article 2(1)(a)(ii) of REGULATION (EU) 2020/1503
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### 3.9 Prudential conso – Crypto

**Only investment firm groups reporting on a consolidated basis should complete the “Prudential conso – Crypto” worksheet.**

**The information should be submitted only once by the Union parent of the investment firm group.**

44. The worksheet “Prudential conso – Crypto assets” collects information on all the entities that are part of the investment group that carry out services that can be deemed equivalent with the crypto asset services under MiCAR Article 3(1)(16).

Column	Legal references and instructions
0010	<b><u>Entity name</u></b> Name of investment firm.
0020	<b><u>LEI code</u></b> LEI code of investment firm.  If the LEI code is not available, a national code should be reported. The code shall be unique and used consistently across the template. The code shall always have a value.
0030	<b><u>Country</u></b> Country of establishment of the entity
0040	<b><u>Type of entity</u></b> Please select the type of entity: <ul style="list-style-type: none"> <li>- EU crypto asset service provider authorised under national law which can be deemed equivalent to the crypto asset service provider under MiCAR Article 3(1)(15)</li> <li>- EU Investment firm not authorised under the national law as crypto asset service provider</li> <li>- EU Other entities not authorised under national law as a crypto asset service provider</li> <li>- Third country entities</li> </ul>
0050	<b><u>Type of ownership</u></b> Please select the type of ownership according to Article 2 of the RTS on prudential consolidation of investment firm groups
0060	<b><u>(a) providing custody and administration of crypto-assets on behalf of clients</u></b>  Please indicate Yes/No if the entity carries out the service ‘providing custody and administration of crypto-assets on behalf of clients’ under national law which can be deemed equivalent to the crypto-asset service under MiCAR Article 3(1)(16)(a)
0070	<b><u>(b) operation of a trading platform for crypto-assets</u></b>  Please indicate Yes/No if the entity carries out the service ‘operation of a trading platform for crypto-assets’ under national law which can be deemed equivalent to the crypto-asset service under MiCAR Article 3(1)(16)(b)



0080	<p><b><u>(c) exchange of crypto-assets for funds</u></b></p> <p>Please indicate Yes/No if the entity carries out the service ‘exchange of crypto-assets for funds’ under national law which can be deemed equivalent to the crypto-asset service under MiCAR Article 3(1)(16)(c)</p>
0090	<p><b><u>(d) exchange of crypto-assets for other crypto-assets</u></b></p> <p>Please indicate Yes/No if the entity carries out the service ‘exchange of crypto-assets for other crypto-assets’ under national law which can be deemed equivalent to the crypto-asset service under MiCAR Article 3(1)(16)(d)</p>
0100	<p><b><u>(e) execution of orders for crypto-assets on behalf of clients</u></b></p> <p>Please indicate Yes/No if the entity carries out the service ‘execution of orders for crypto-assets on behalf of clients’ under national law which can be deemed equivalent to the crypto-asset service under MiCAR Article 3(1)(16)(e)</p>
0110	<p><b><u>(f) placing of crypto-assets</u></b></p> <p>Please indicate Yes/No if the entity carries out the service ‘placing of crypto-assets’ under national law which can be deemed equivalent to the crypto-asset service under MiCAR Article 3(1)(16)(f)</p>
0120	<p><b><u>(g) reception and transmission of orders for crypto-assets on behalf of clients</u></b></p> <p>Please indicate Yes/No if the entity carries out the service ‘reception and transmission of orders for crypto-assets on behalf of clients’ under national law which can be deemed equivalent to the crypto-asset service under MiCAR Article 3(1)(16)(g)</p>
0130	<p><b><u>(h) providing advice on crypto-assets</u></b></p> <p>Please indicate Yes/No if the entity carries out the service ‘providing advice on crypto-assets’ under national law which can be deemed equivalent to the crypto-asset service under MiCAR Article 3(1)(16)(h)</p>
0140	<p><b><u>(i) providing portfolio management on crypto-assets</u></b></p> <p>Please indicate Yes/No if the entity carries out the crypto-asset service ‘providing portfolio management on crypto-assets’ under national law which can be deemed equivalent to the crypto-asset service under MiCAR Article 3(1)(16)(i)</p>
0150	<p><b><u>(j) providing transfer services for crypto-assets on behalf of clients</u></b></p> <p>Please indicate Yes/No if the entity carries out the service ‘providing transfer services for crypto-assets on behalf of clients’ under national law which can be deemed equivalent to the crypto-asset service under MiCAR Article 3(1)(16)(j)</p>



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