
RISK ASSESSMENT QUESTIONNAIRE

Graphs / Spring 2024



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Introduction

The EBA conducts semi-annual Risk Assessment Questionnaires (RAQs) among banks. This booklet presents a summary of the responses to the survey carried out in Spring 2024, in which 85 banks¹ submitted their answers. Results of the survey were received in March 2024, are published together with the EBA's quarterly Risk Dashboard (Q1 2024) and are presented in an aggregate form. The questionnaire is available in the Appendix. Where relevant, answers from former questionnaires may be presented. Due to the change in sample of banks (sample was made of 60 banks in Autumn 2022), the comparison with previous results should be made with caution. Responses that were not selected by any banks are not presented in the charts.

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

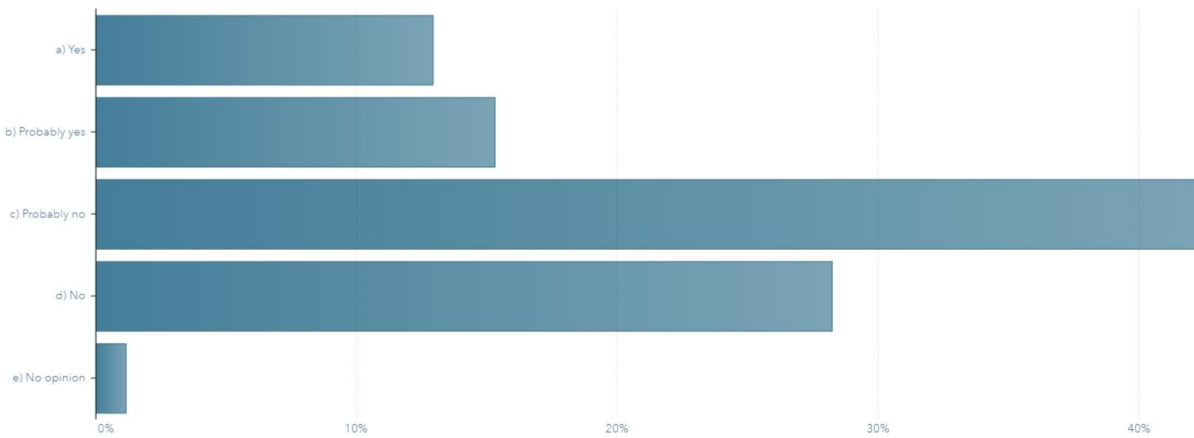
¹ A list of banks participating in the survey is published in the Annex.

Banks' questionnaire

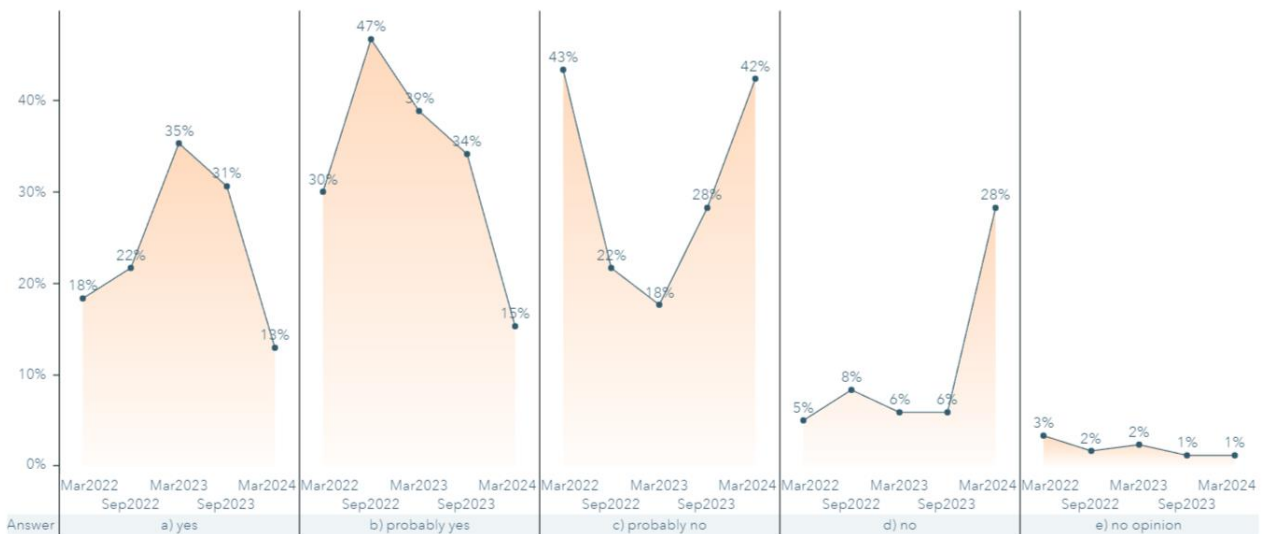
1. Business model / strategy / profitability

Question 1: Spring 2024 results

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

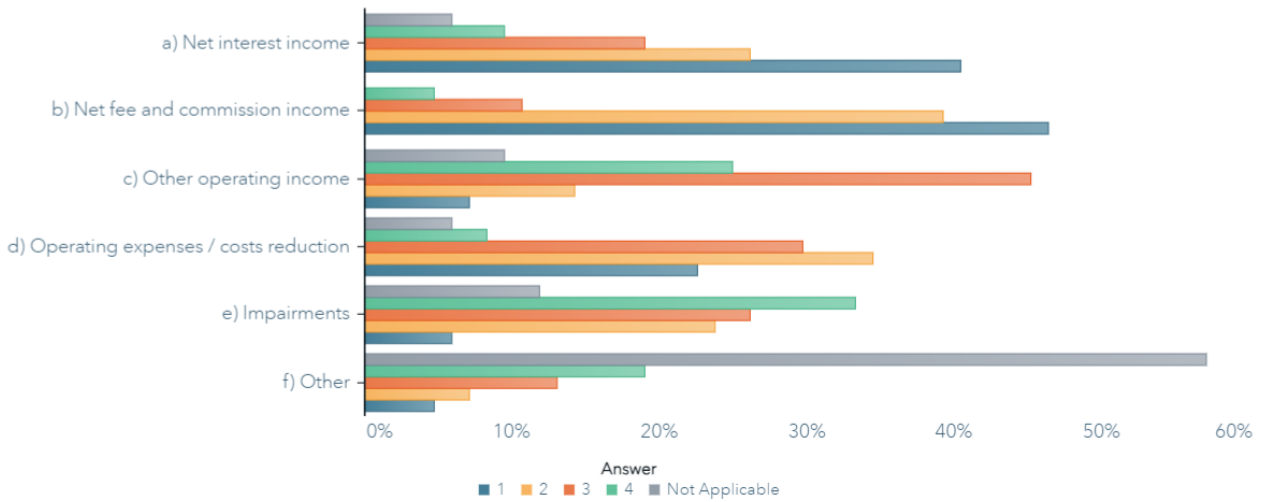


Question 1: Comparison with earlier results



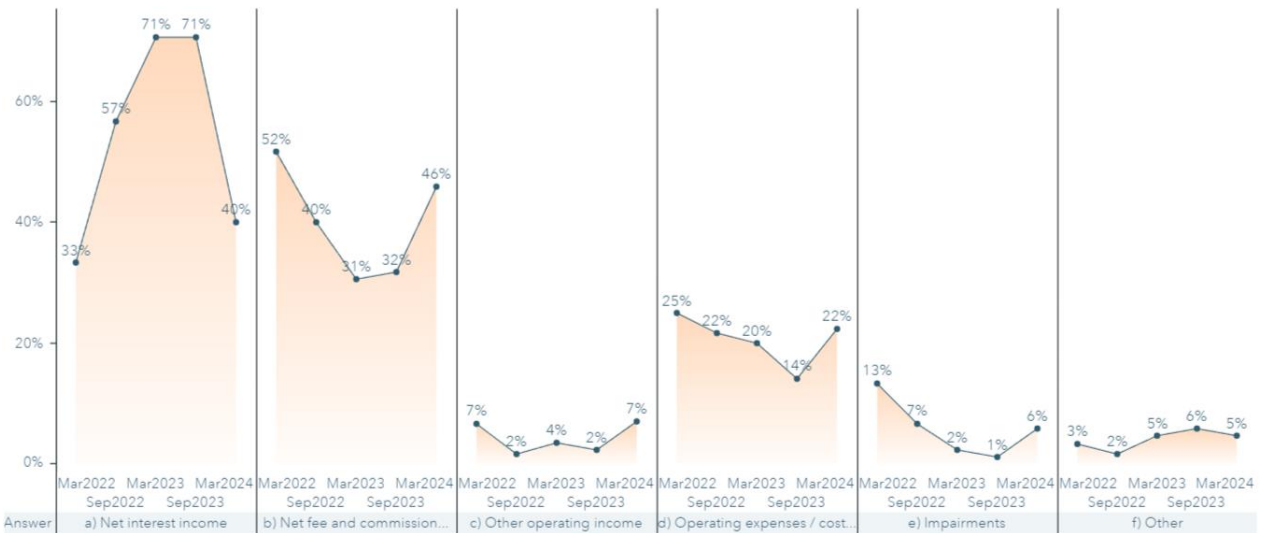
Question 2: Spring 2024 results

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



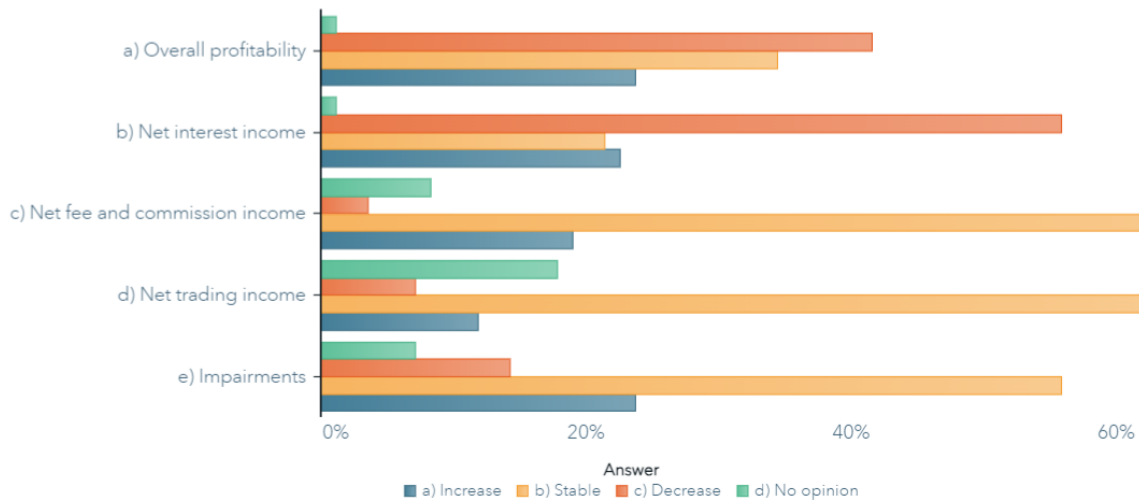
Question 2: Comparison with earlier results

1 - High Priority



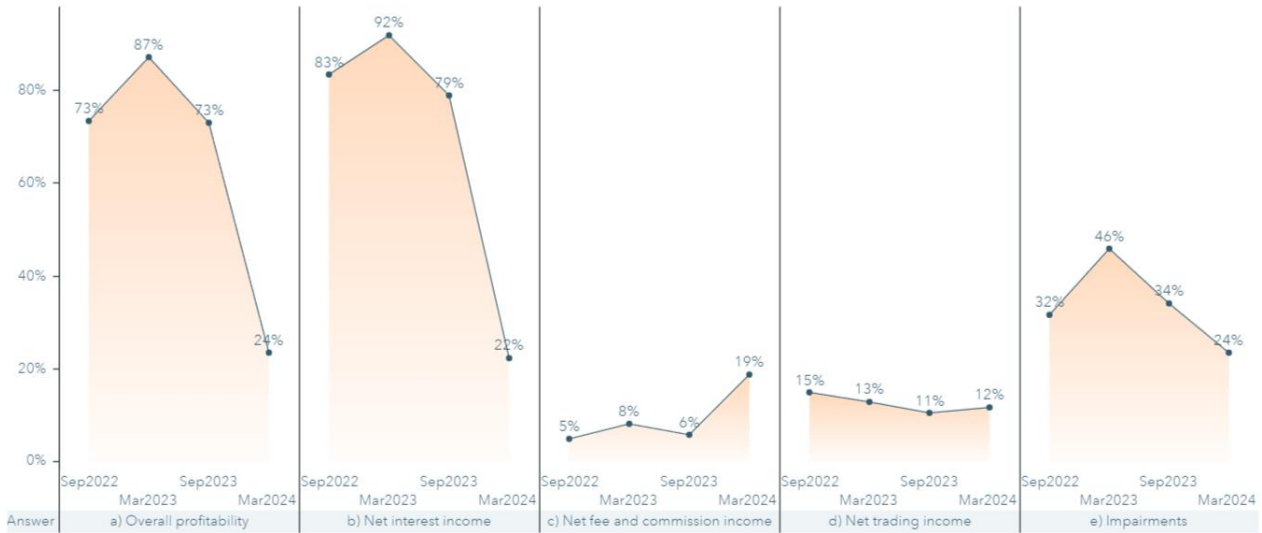
Question 3: Spring 2024 results

Q3 How do you expect interest rate environment to affect your P&L over the next 6 to 12 months?

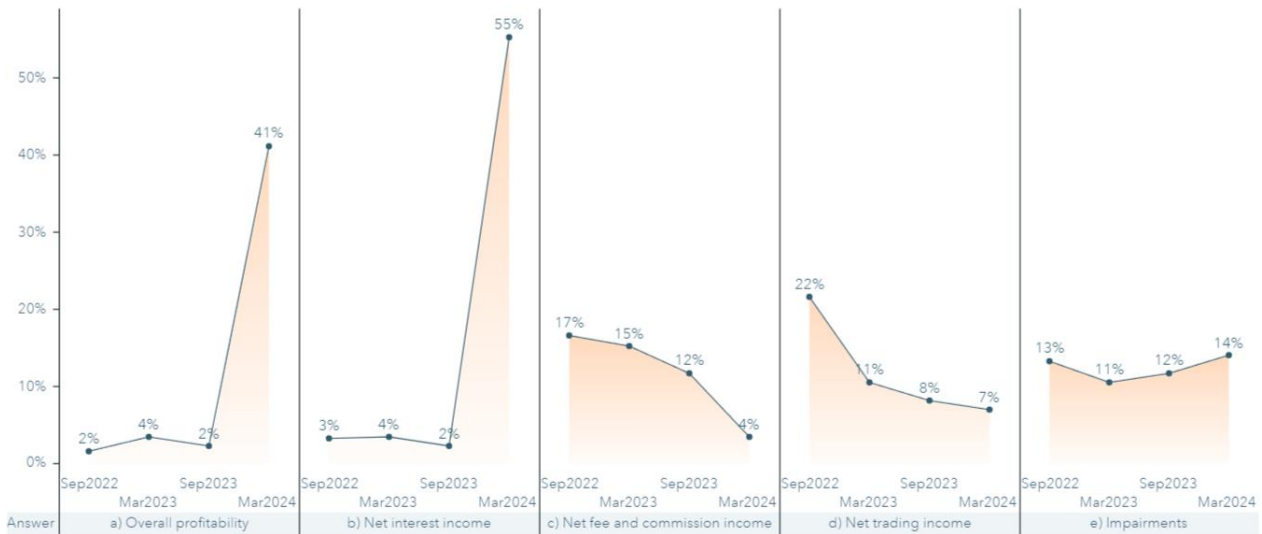


Question 3: Comparison with earlier results

Increase

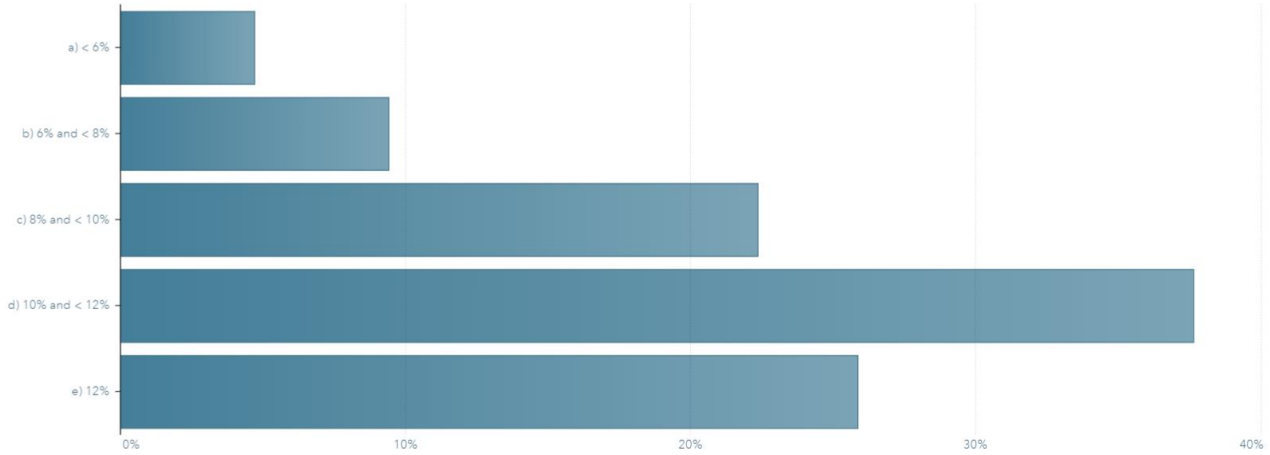


Decrease

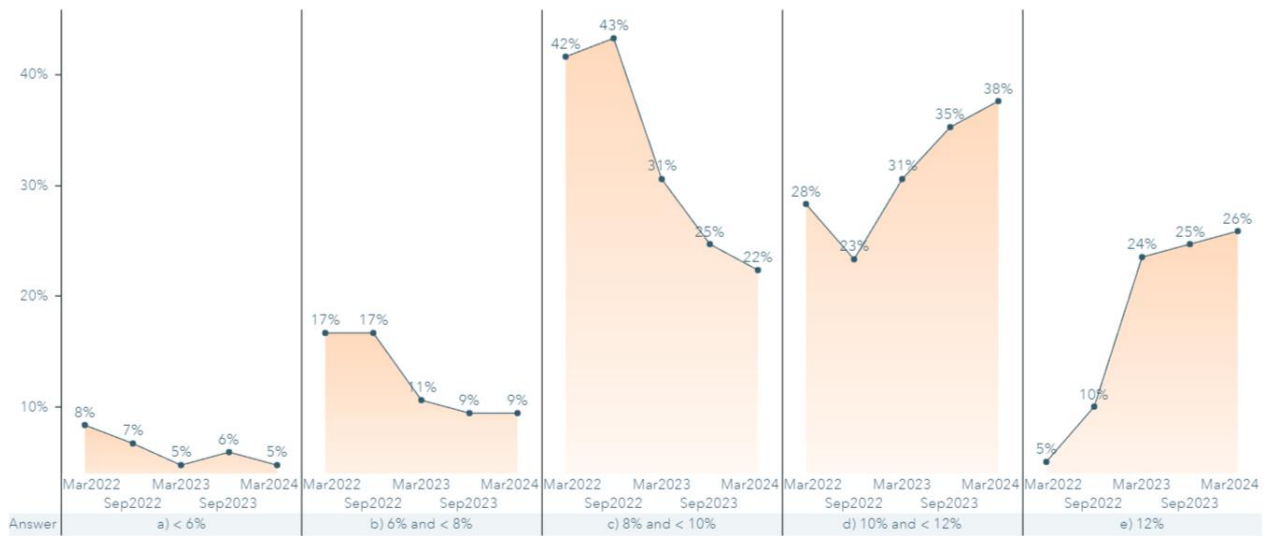


Question 4: Spring 2024 results

Q4 What is your estimated Cost of Equity*?

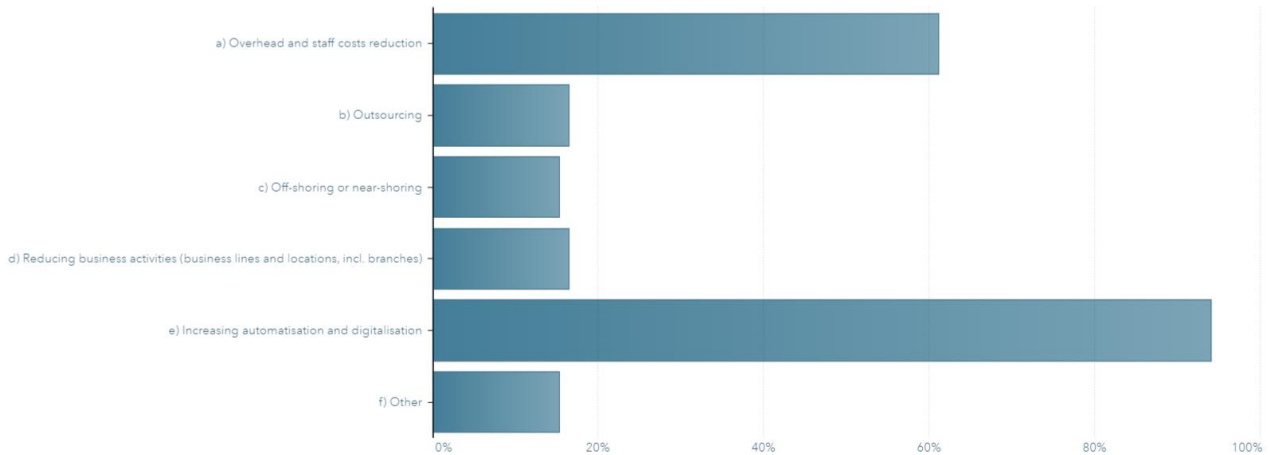


Question 4: Comparison with earlier results

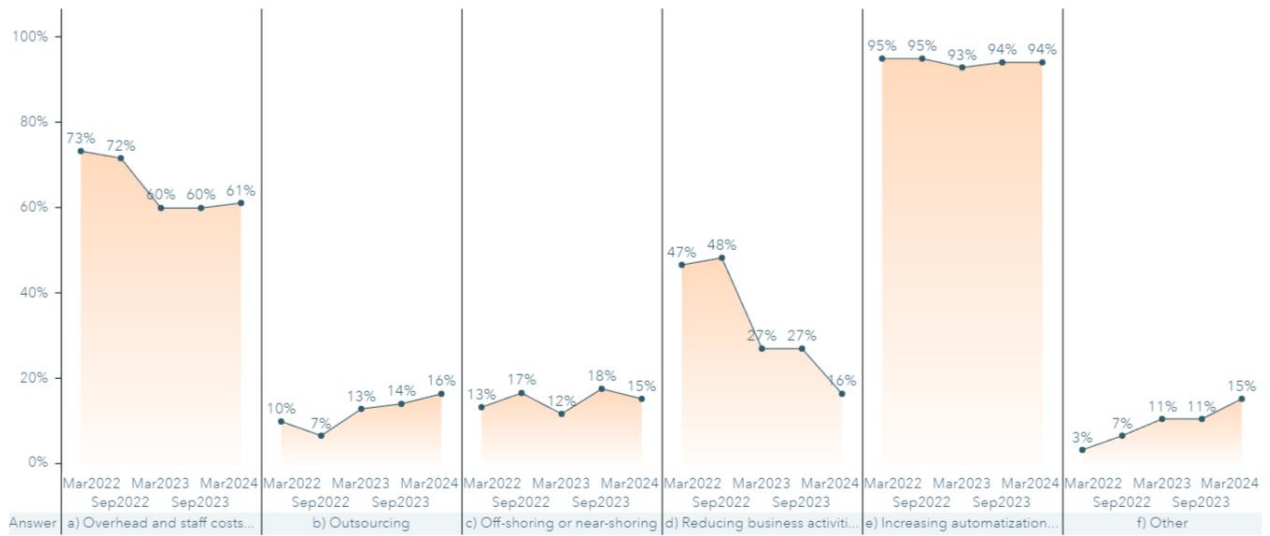


Question 5: Spring 2024 results

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

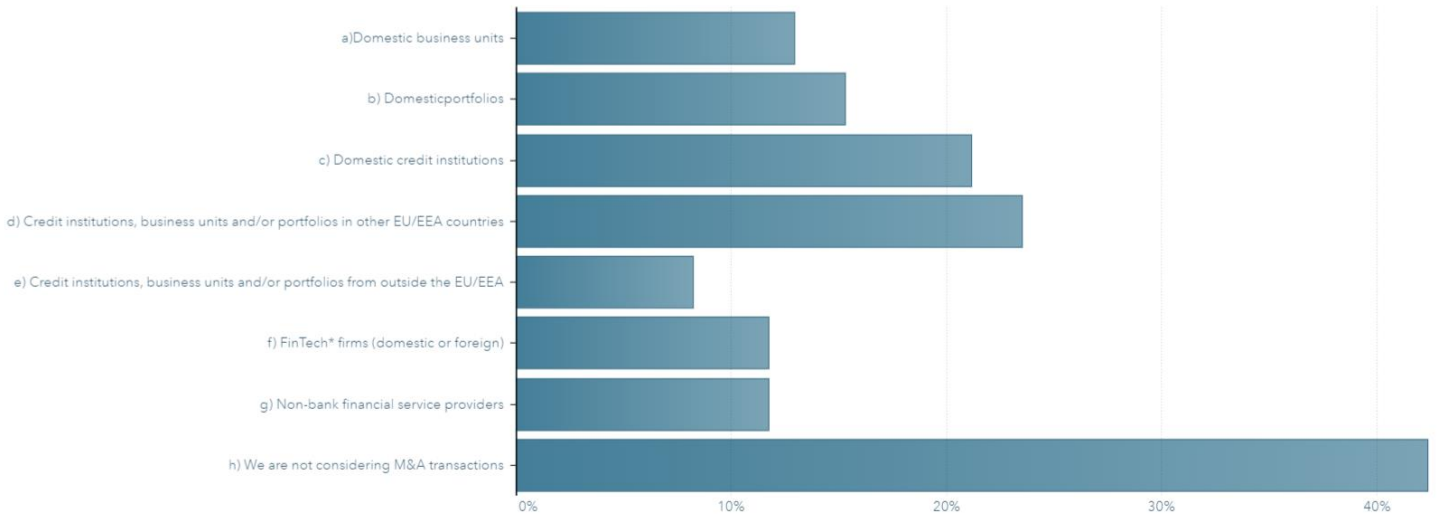


Question 5: comparison with earlier results

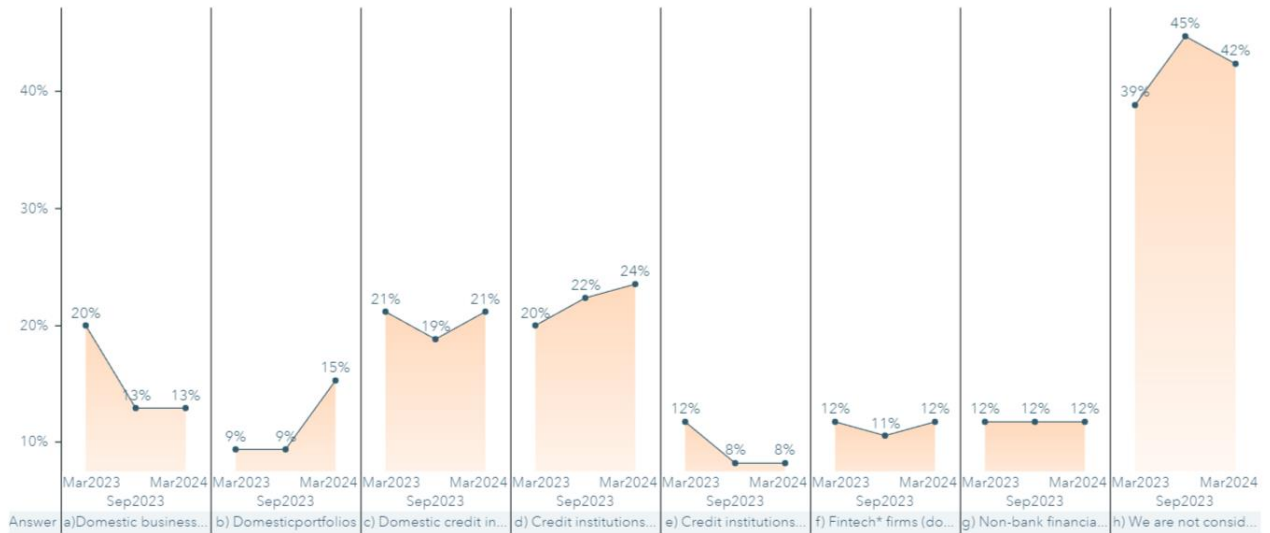


Question 6: Spring 2024 results

Q6 Are you considering M&A transactions with/of?

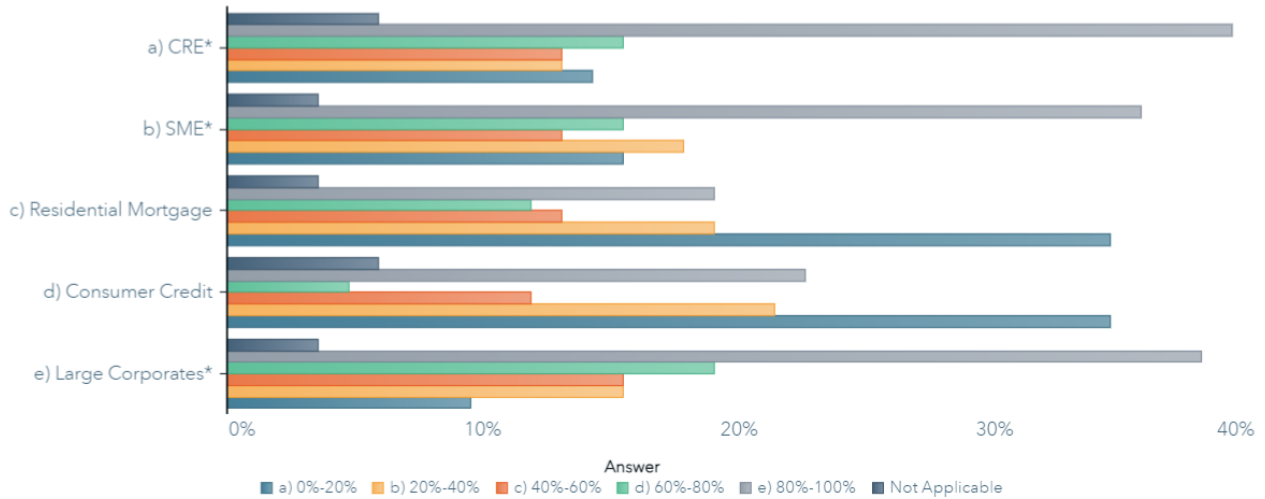


Question 6: comparison with earlier results



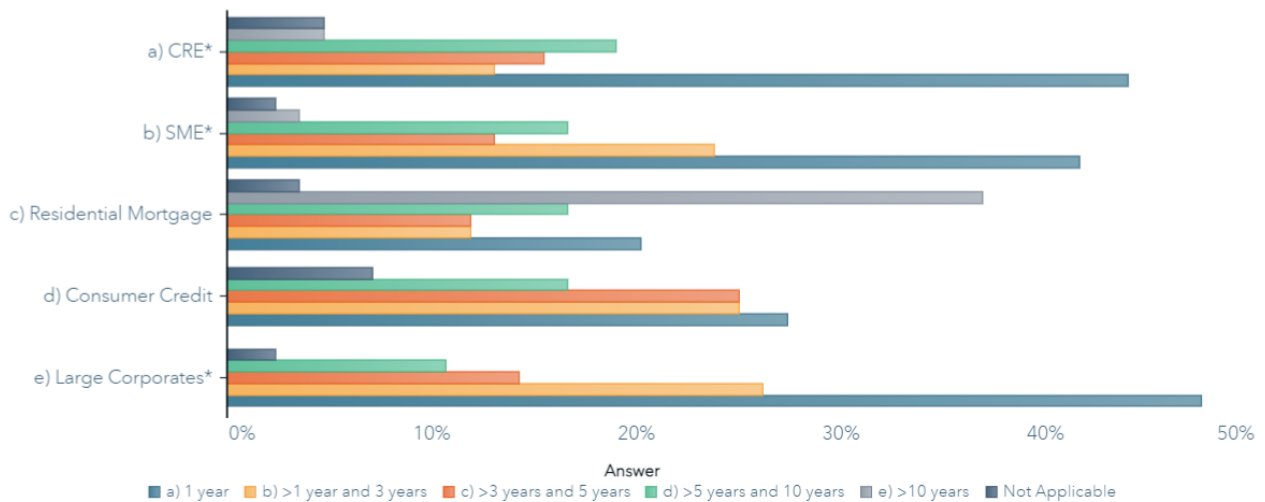
Question 7: Spring 2024 results

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



Question 8: Spring 2024 results

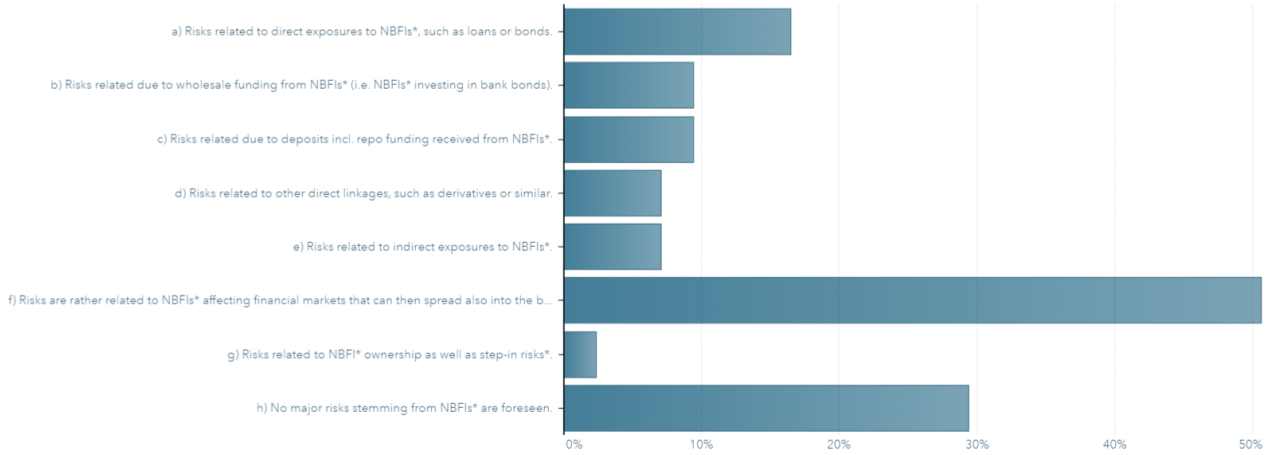
Q8 Which is the average interest rate fixation period* for the following loan portfolios (at origination)?²



² If the rate is fixed for the whole life of a loan, it was selected 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), it was selected the length of the first fixation period.

Question 9: Spring 2024 results

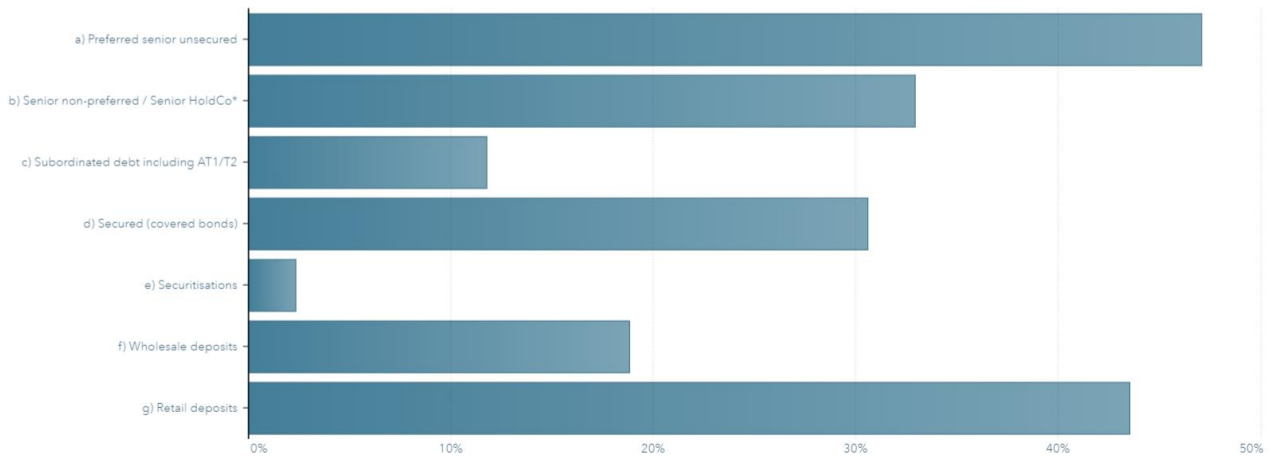
Q9 Where do you see the main risks stemming from interlinkages with NBFIs*?



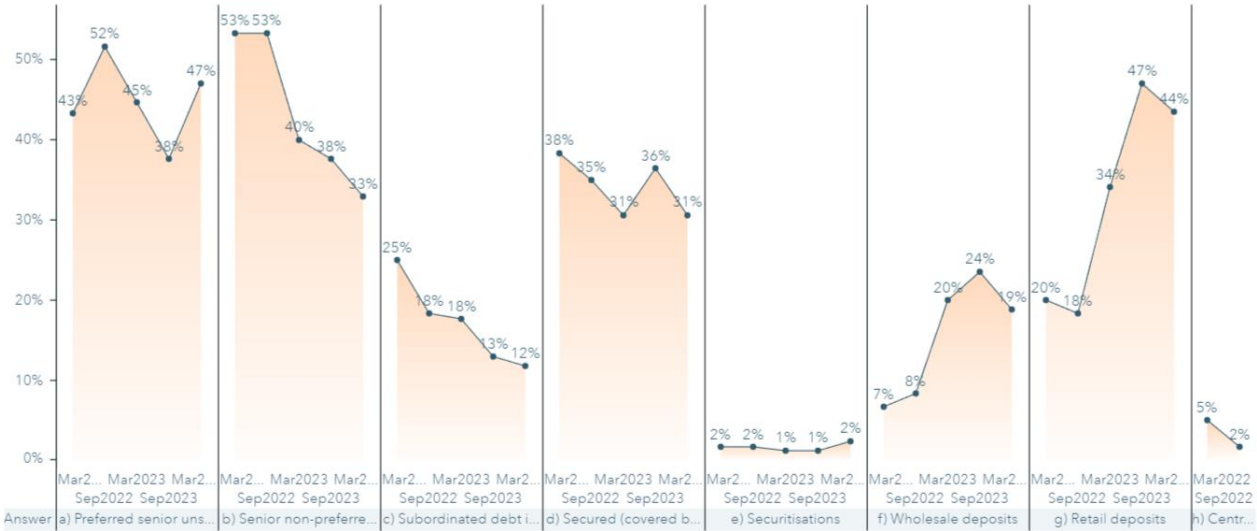
2. Funding / liquidity

Question 10: Spring 2024 results

Q10 In the next 12 months, which funding instruments do you intend to focus on?

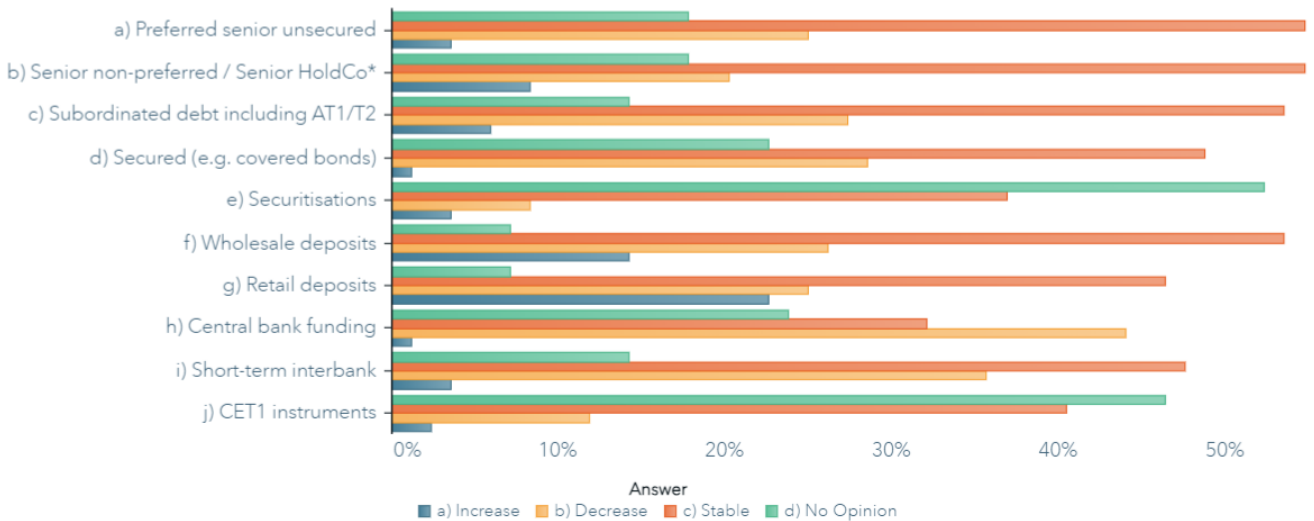


Question 10: comparison with earlier results



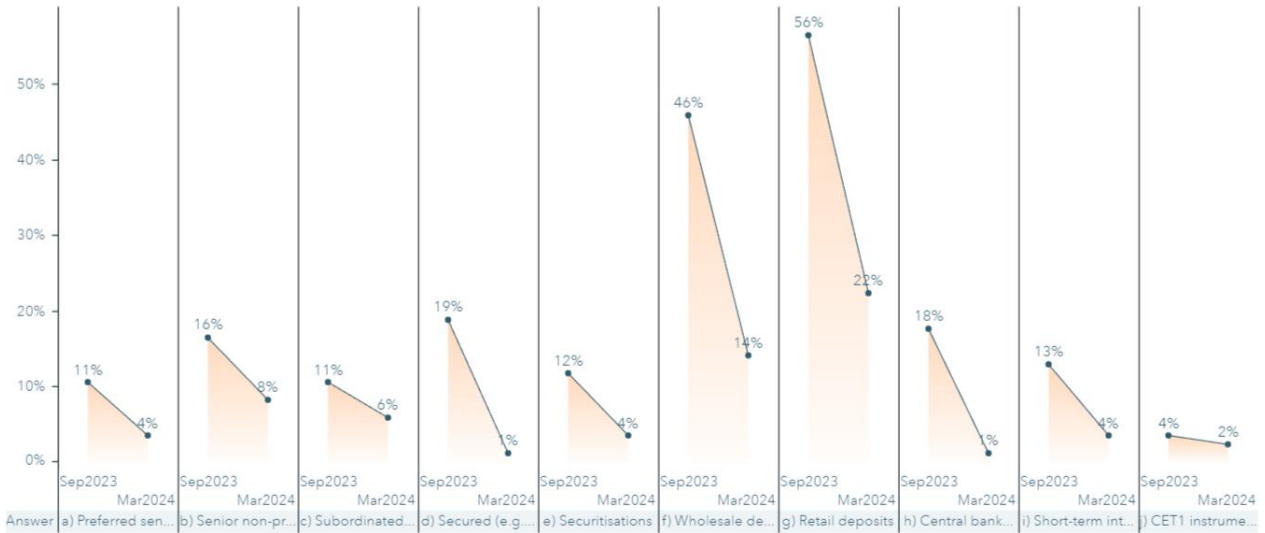
Question 11: Spring 2024 results

Q11 In the next 12 months, which are your expectations on the costs (spreads) for your bank for the following funding sources?

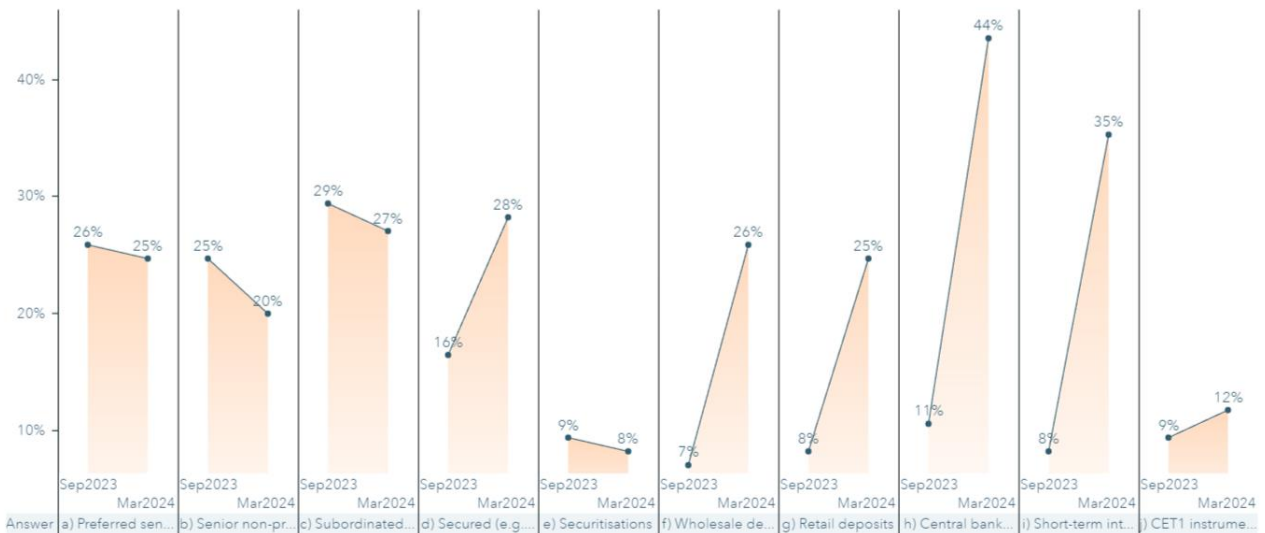


Question 11: comparison with earlier results

Increase

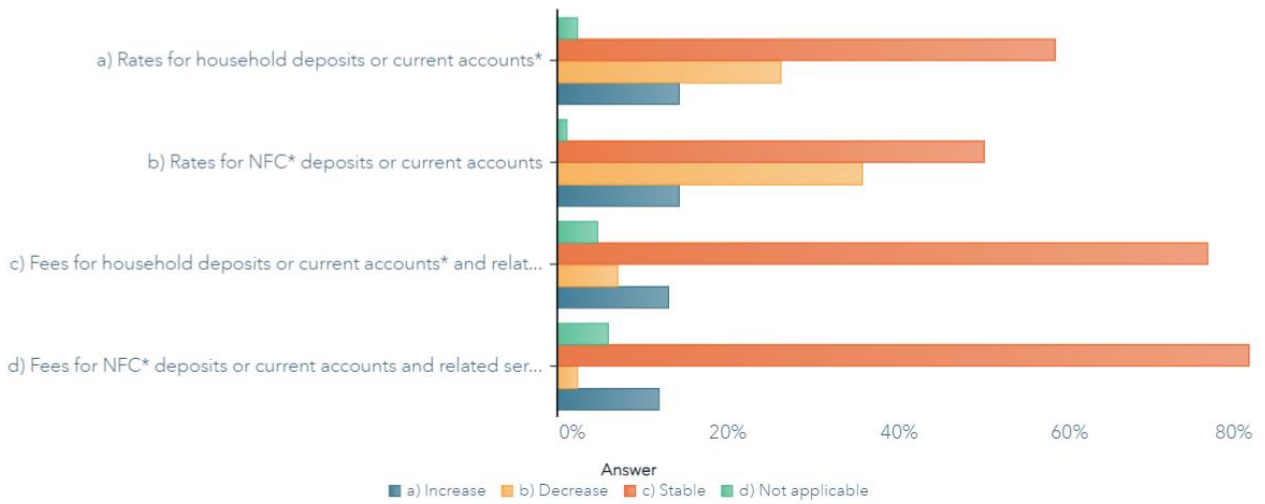


Decrease



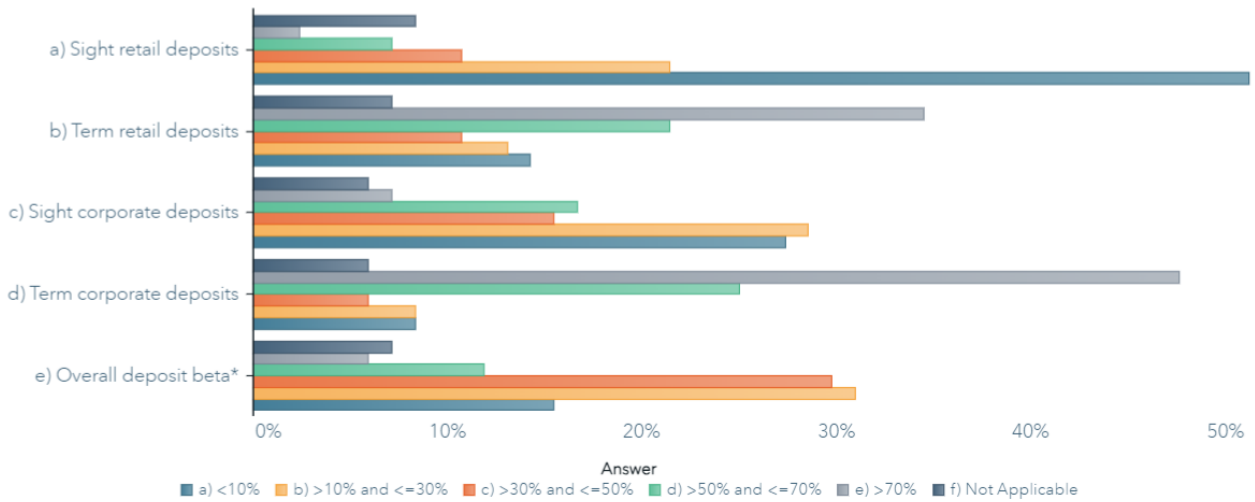
Question 12: Spring 2024 results

Q12 Which of the following actions are you considering in relation to deposits (sight and term) and current accounts?



Question 13: Spring 2024 results

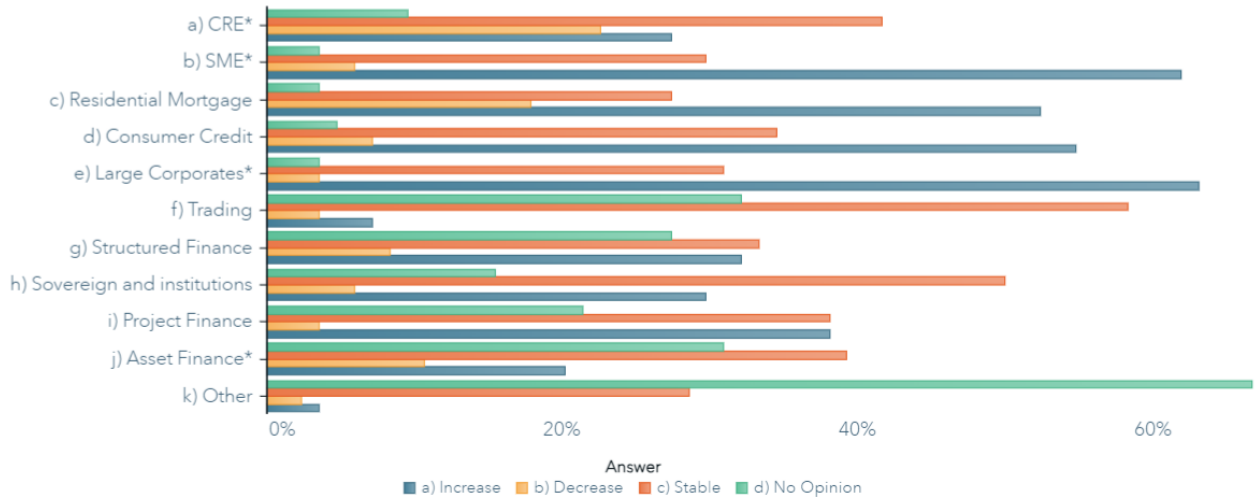
Q13 What is your expectation on the level of deposit beta* for each of the following portfolios in the next 6 to 12 months?



3. Asset composition and quality

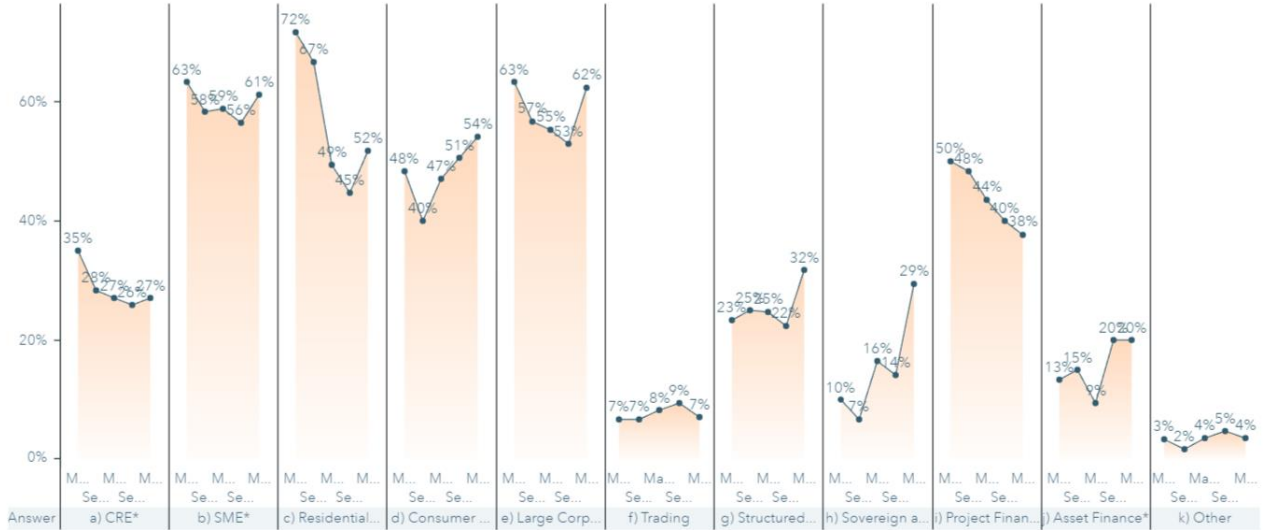
Question 14: Spring 2024 results

Q14 Which portfolios do you plan to increase/decrease in volume during the next 12 months (on a net basis)?

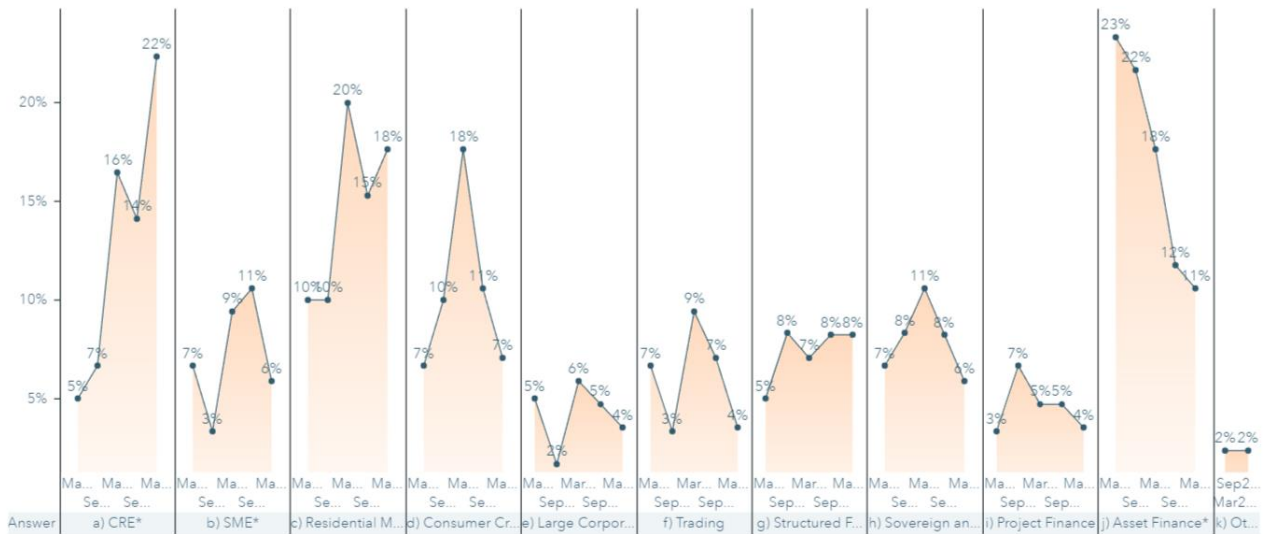


Question 14: comparison with earlier results

Increase

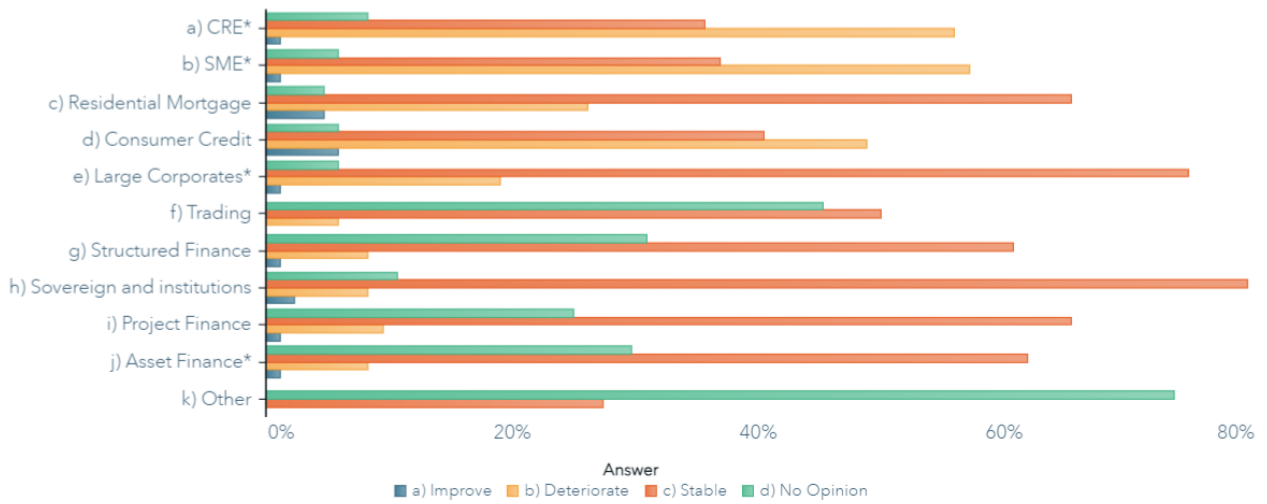


Decrease



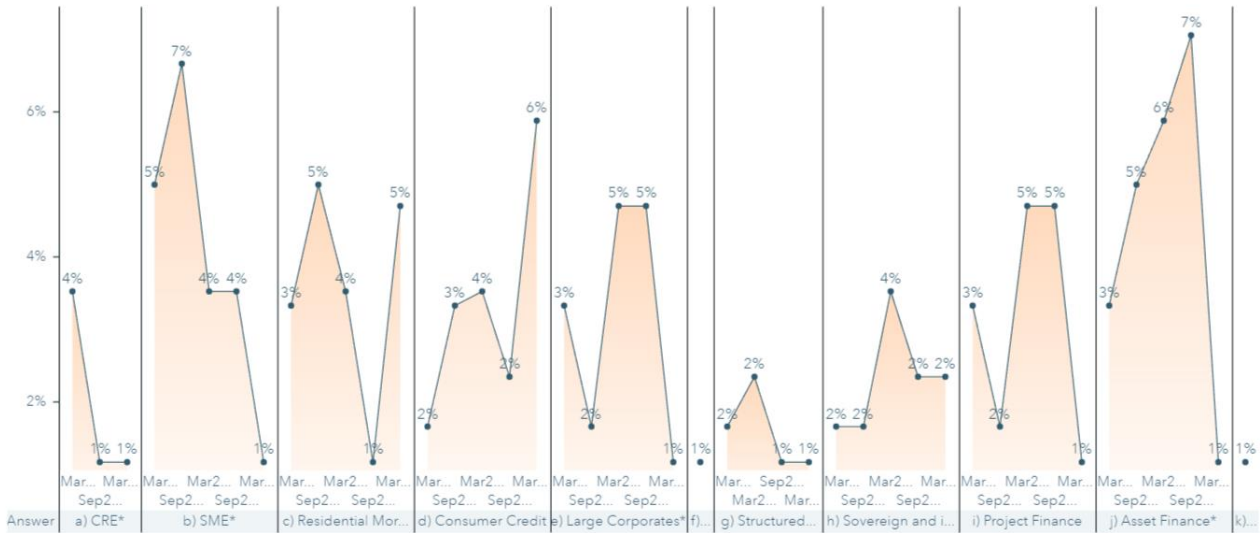
Question 15: Spring 2024 results

Q15 Which portfolios do you plan to increase/decrease in volume during the next 12 months (on a net basis)?

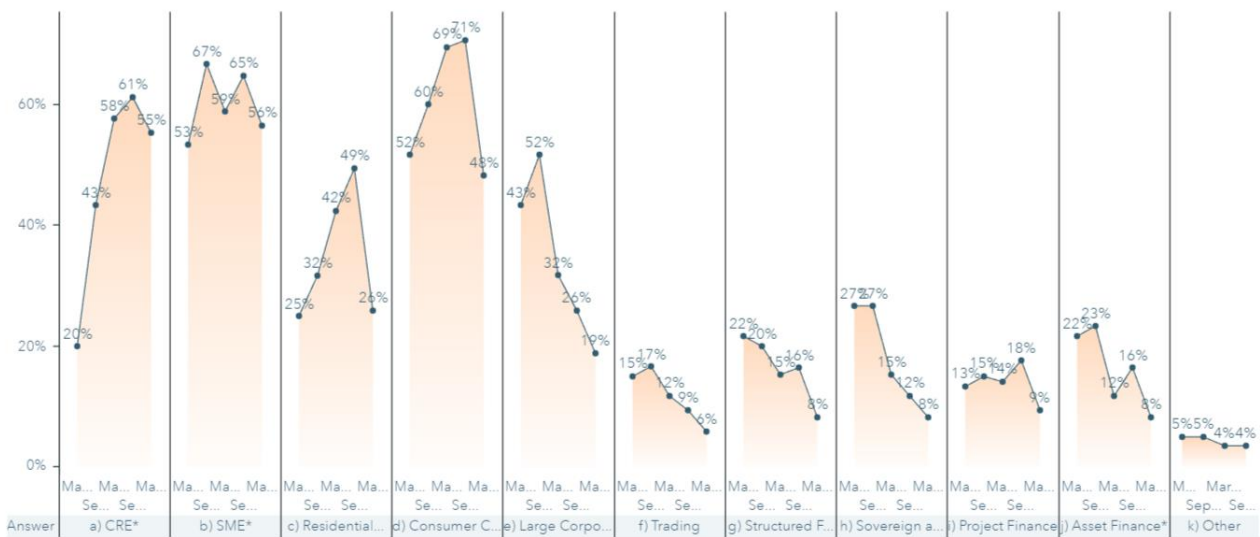


Question 15: comparison with earlier results

Improve

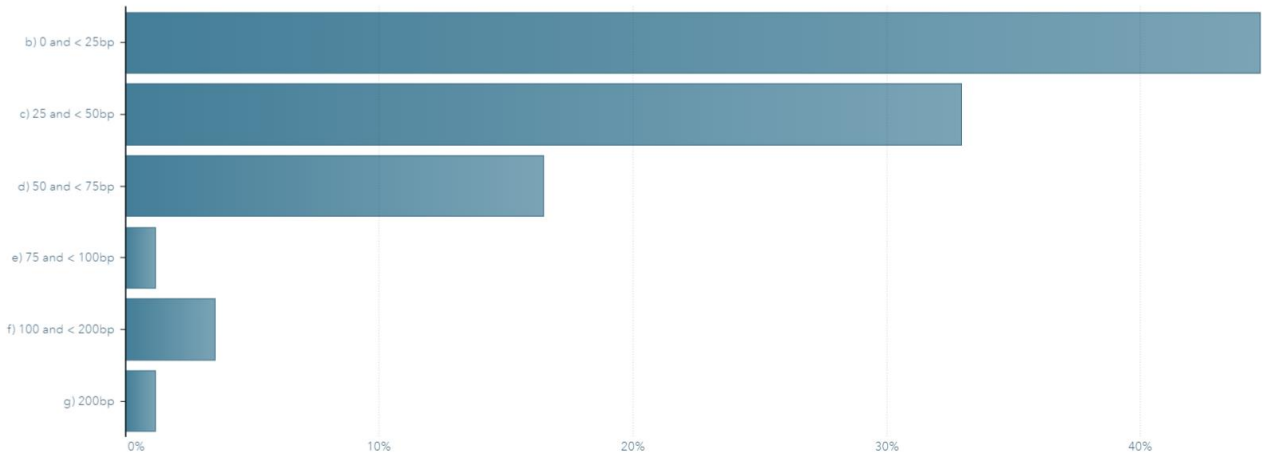


Deteriorate

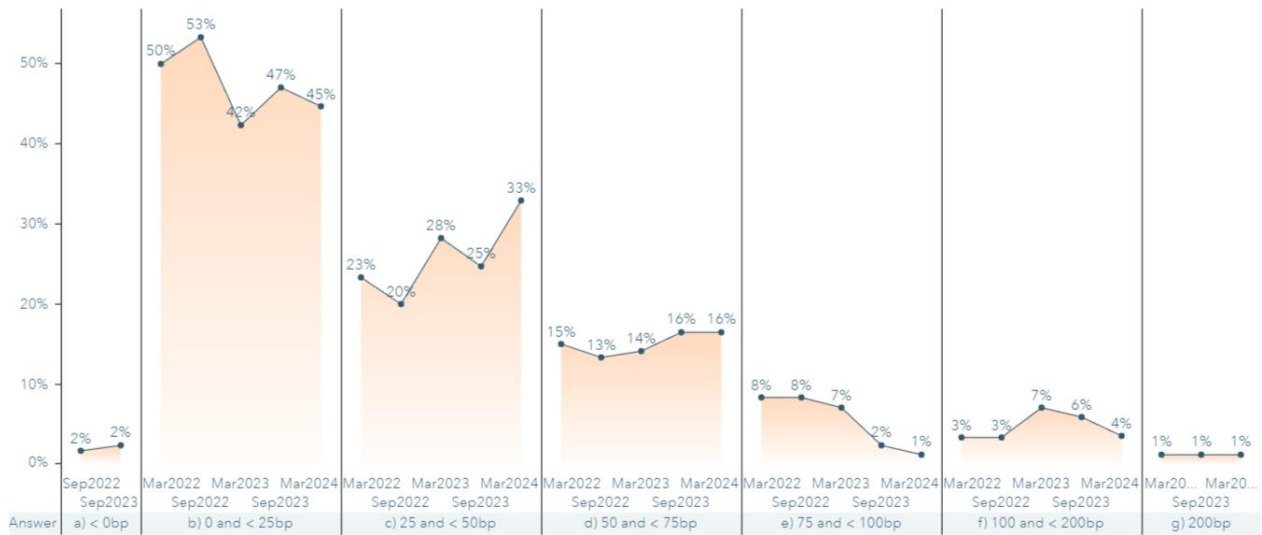


Question 16: Spring 2024 results

Q16 Which is your Cost of Risk* estimation for the current financial year?

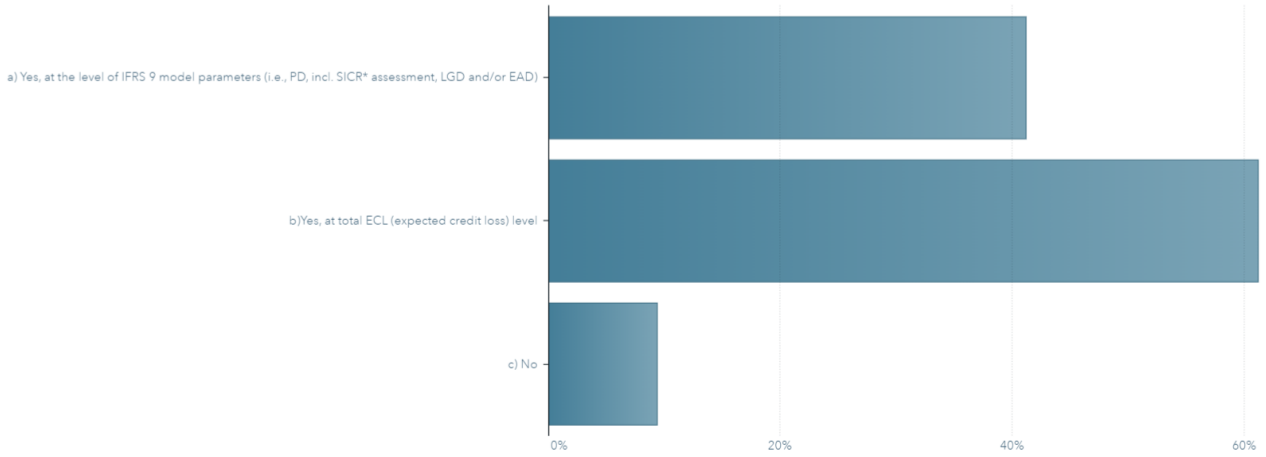


Question 16: comparison with earlier results

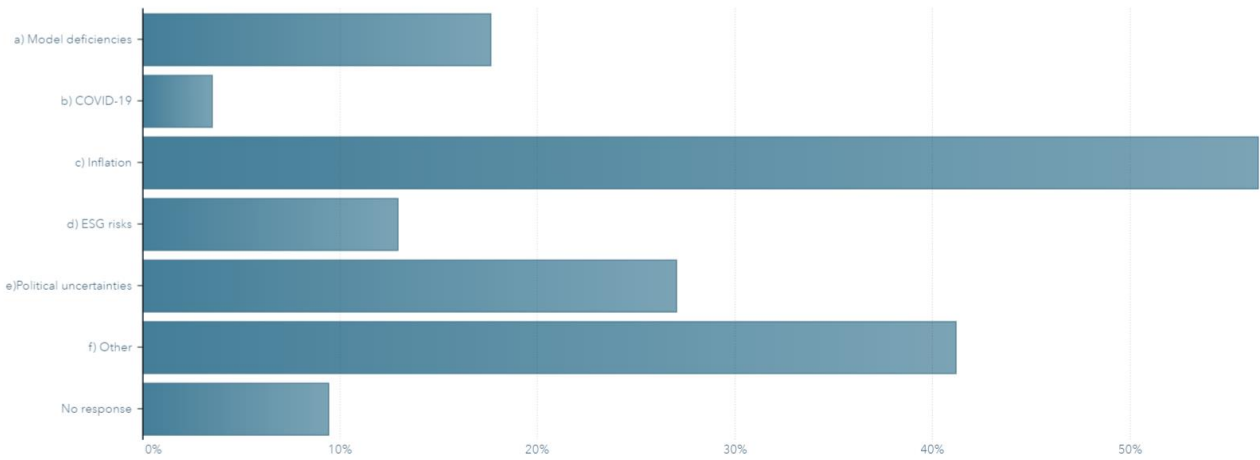


Question 17: Spring 2024 results

Q17 Do you have any provisioning overlays in place?

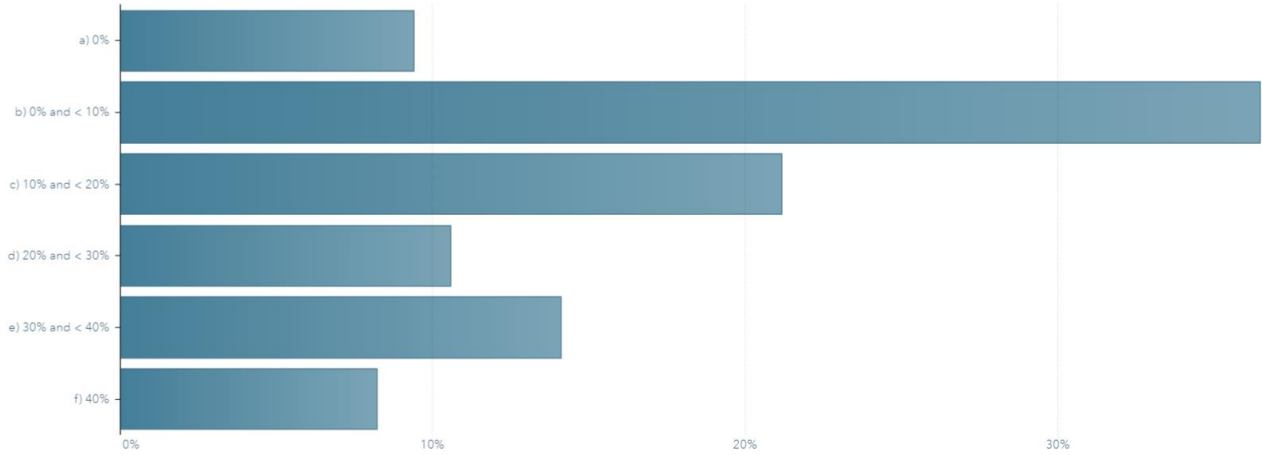


Q17.1 If you selected a) or b), which factors are the overlays associated to?

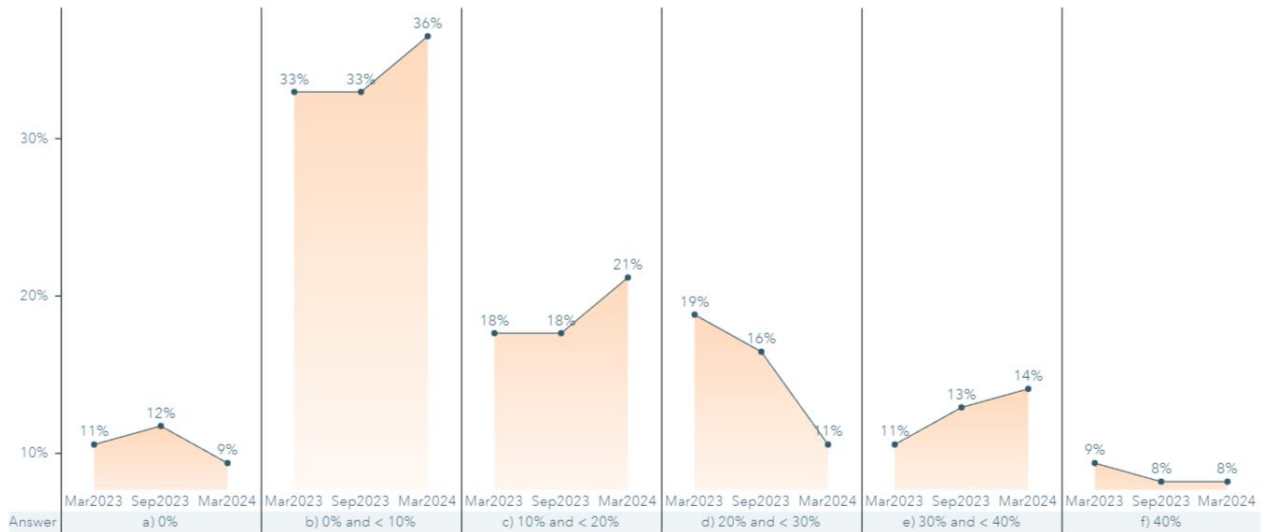


Question 18: Spring 2024 results

Q18 Which is the proportion of the total ECL (expected credit loss) amount that is recognised via provisioning overlays?



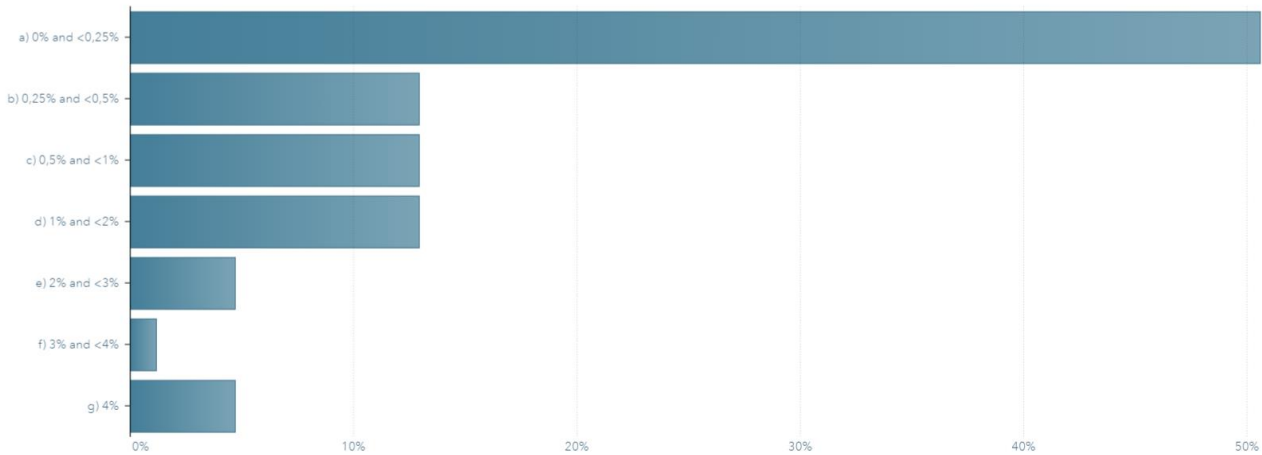
Question 18: comparison with earlier results



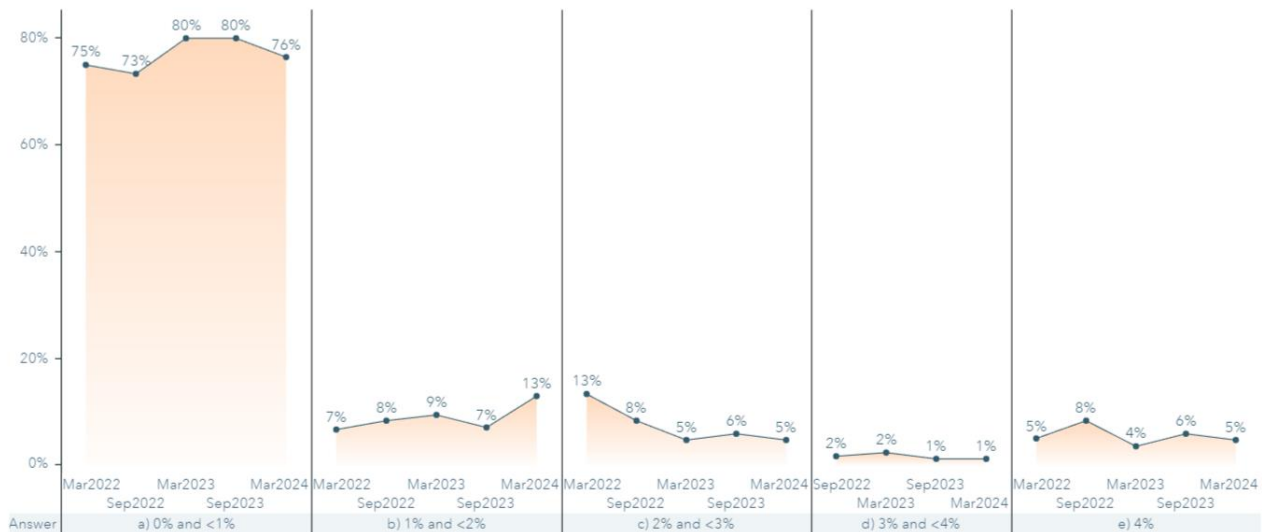
4. Conduct, Reputational and Operational Risk

Question 19: Spring 2024 results

Q19 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*)?

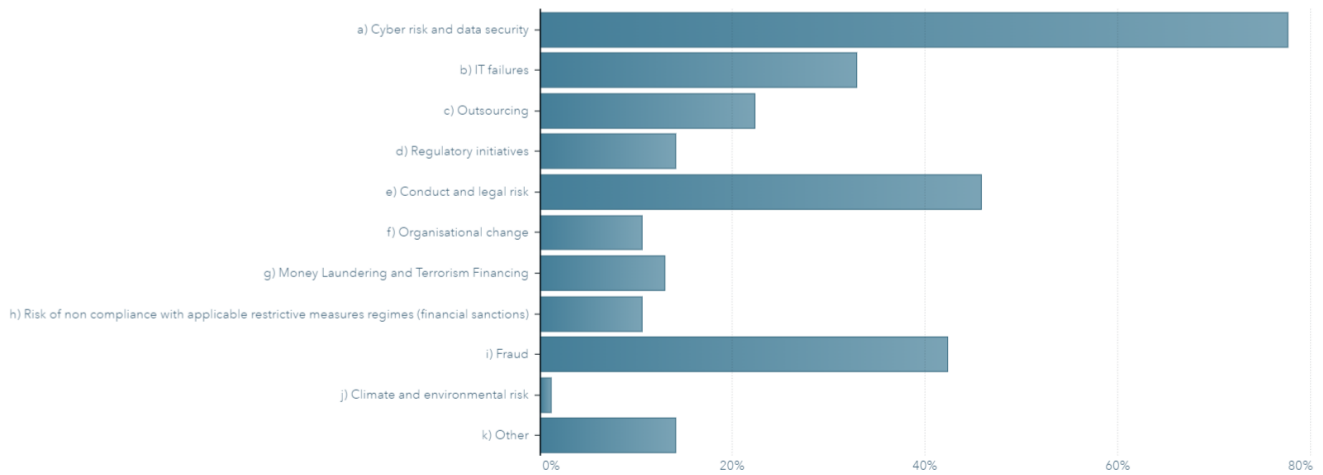


Question 19: comparison with earlier results

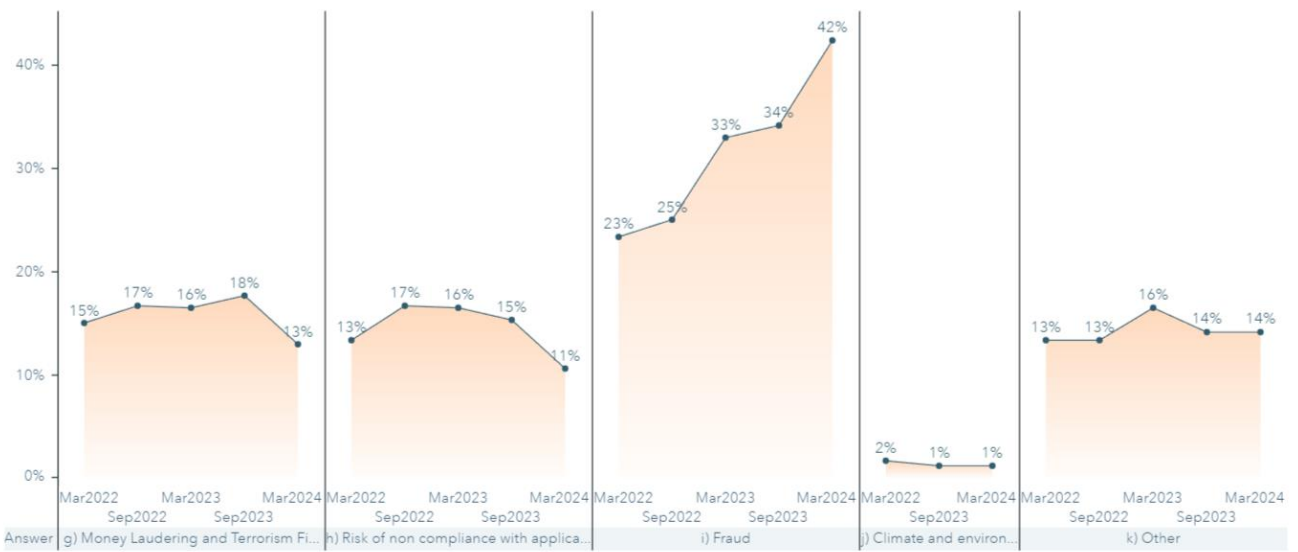
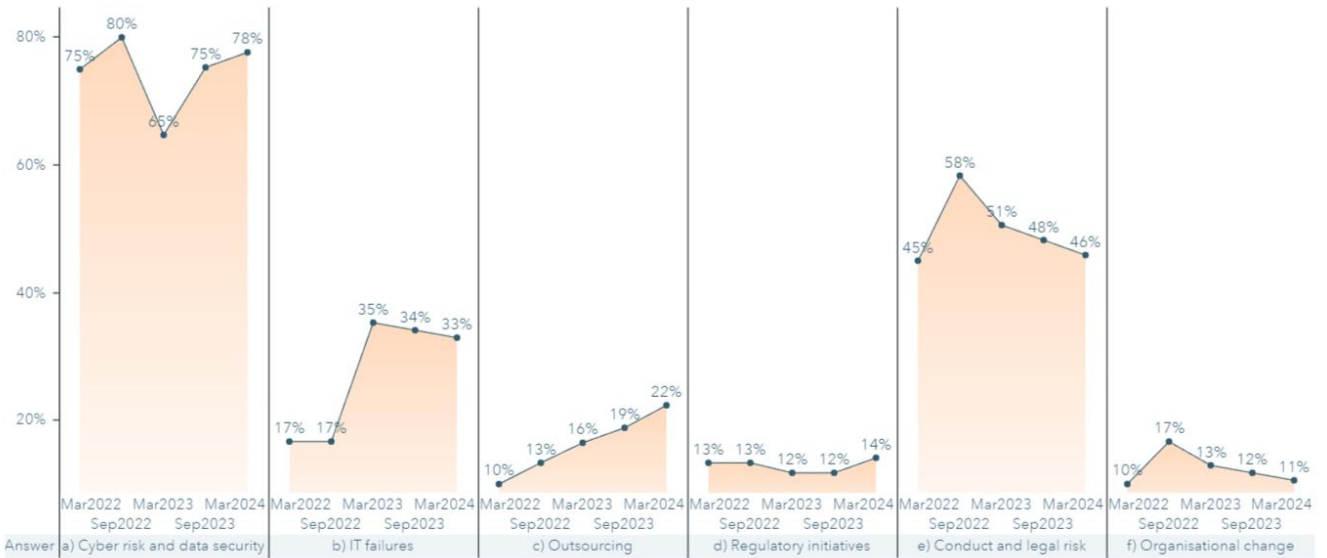


Question 20: Spring 2024 results

Q20 Which are the main drivers of operational risk?

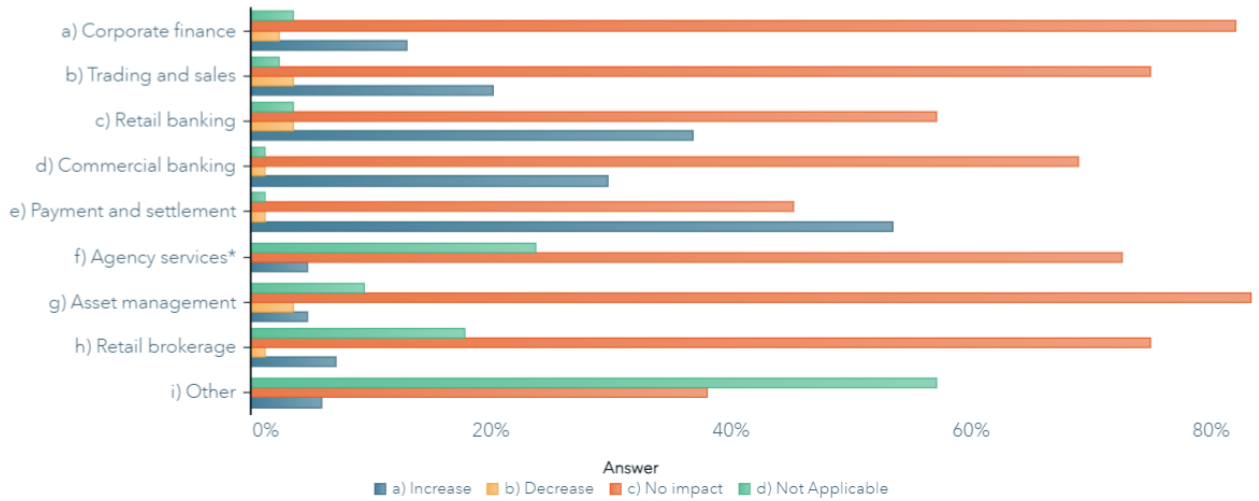


Question 20: comparison with earlier results



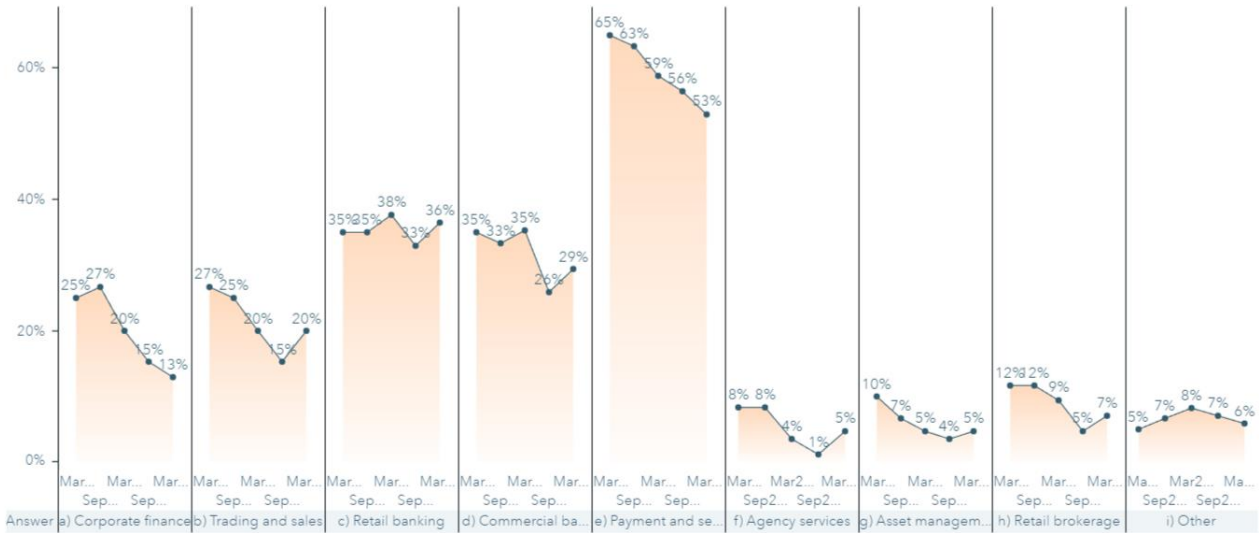
Question 21: Spring 2024 results

Q21 How do you expect your Money Laundering and Terrorism Financing risks related to the following products / business lines to evolve in the next 6 to 12 months?

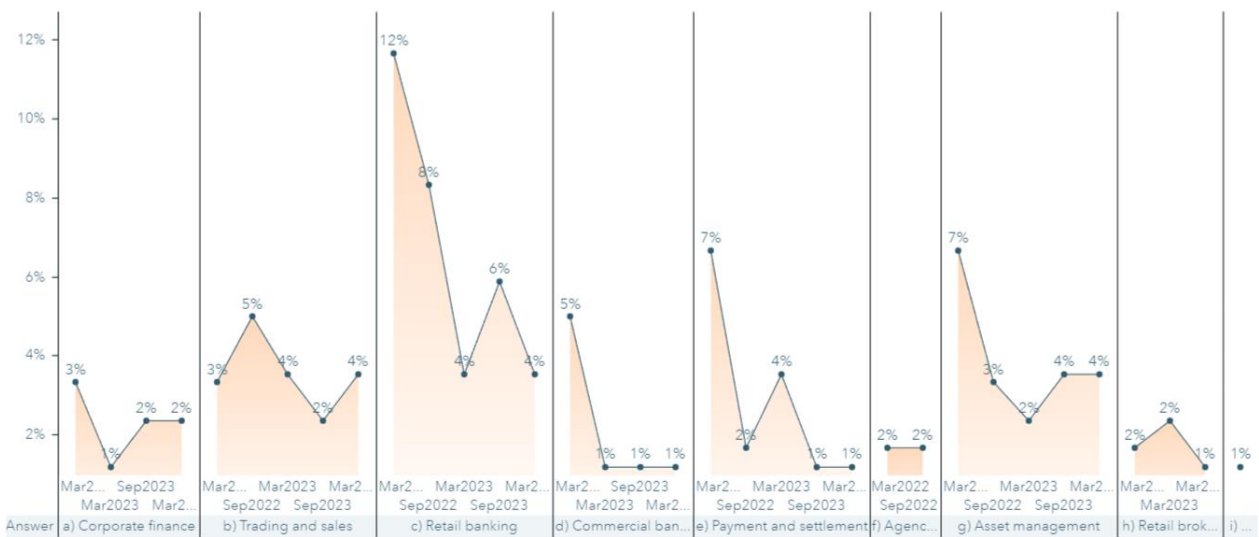


Question 21: comparison with earlier results

Increase

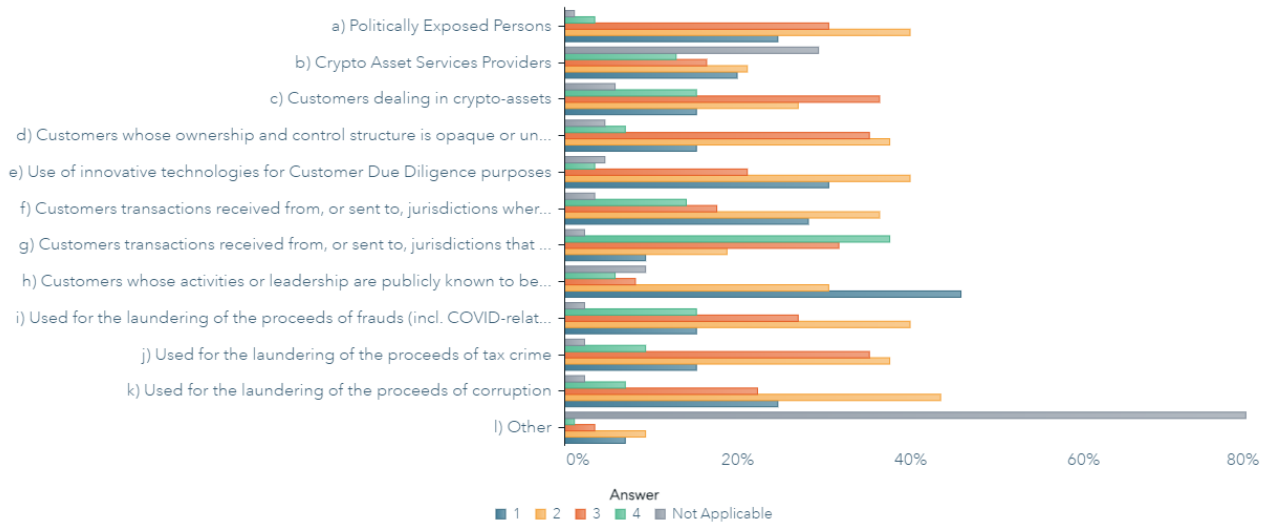


Decrease

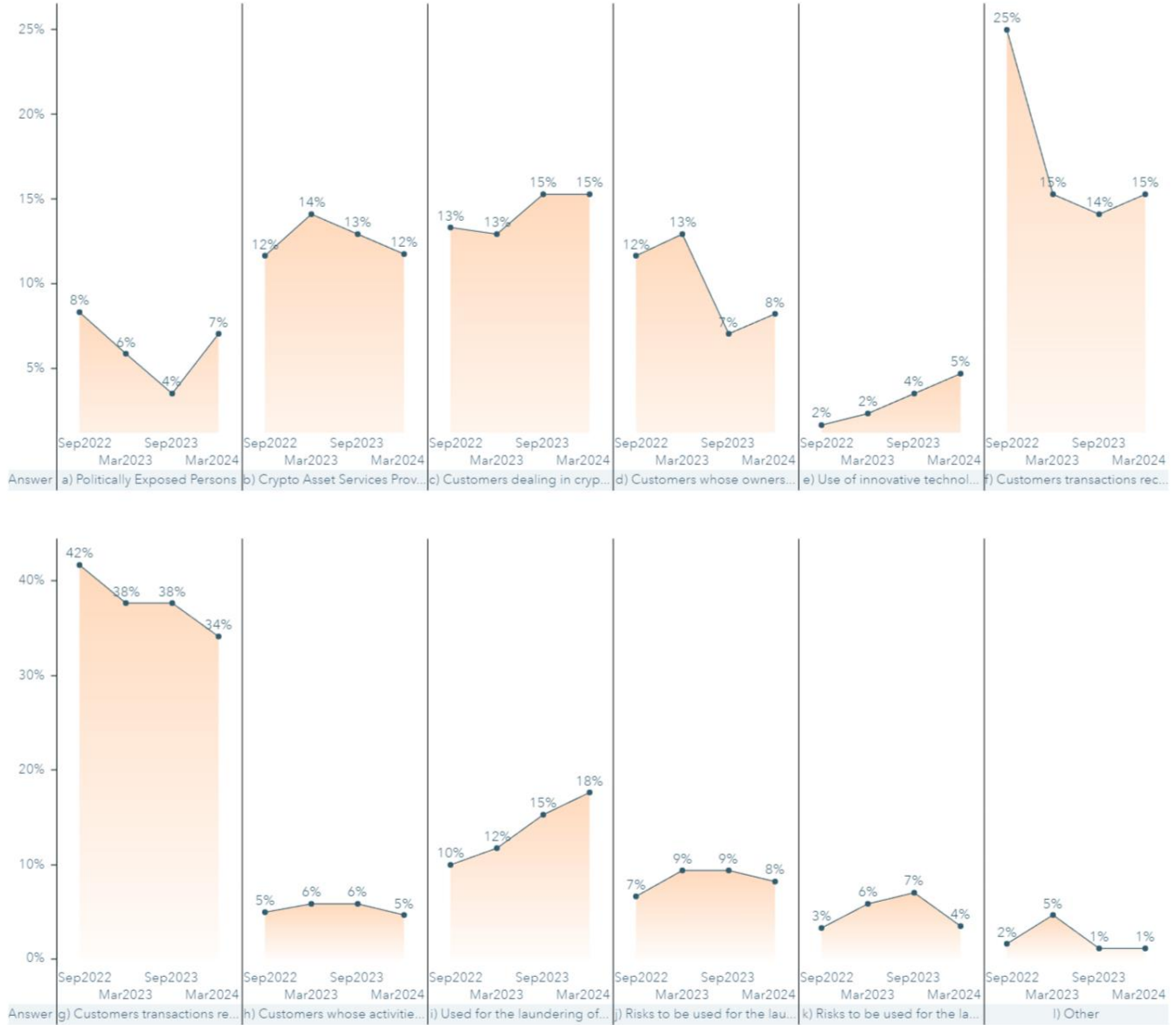


Question 22: Spring 2024 results

Q22 Which key Money Laundering and Terrorism Financing risks do you expect to face over the coming 6 to 12 months?
 (1 - Low Significance and 4 - High Significance)

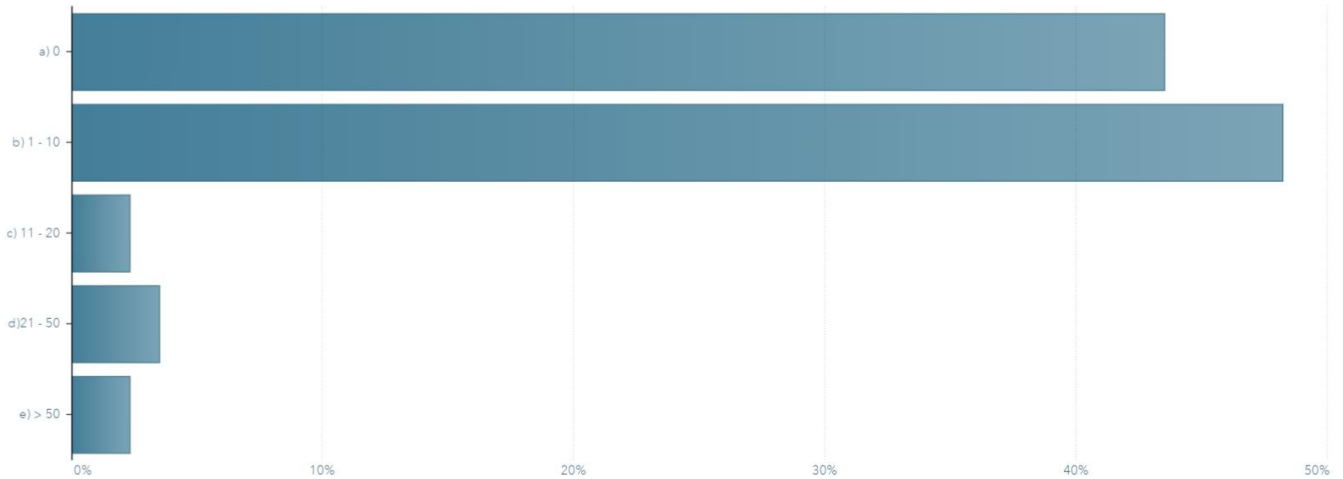


Question 22: comparison with earlier results

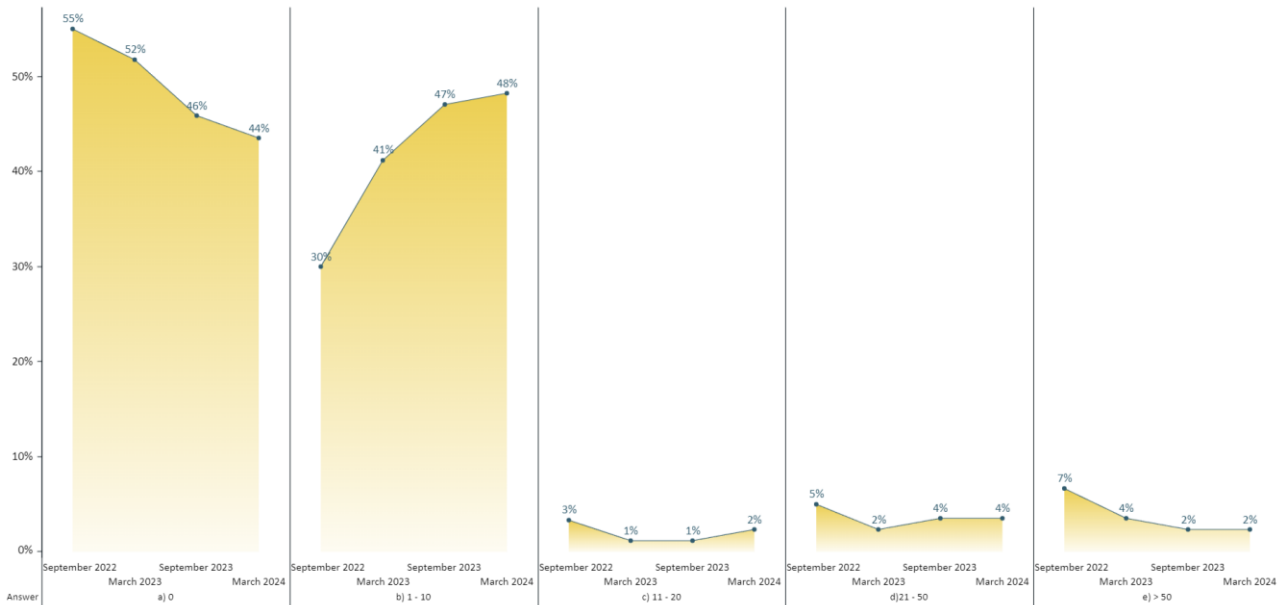


Question 23: Spring 2024 results

Q23 How many cyber-attacks that resulted or could have potentially resulted in a "major ICT-related incident"* have you faced from 1 July to 31 December 2023 (considering the highest level of consolidation)?

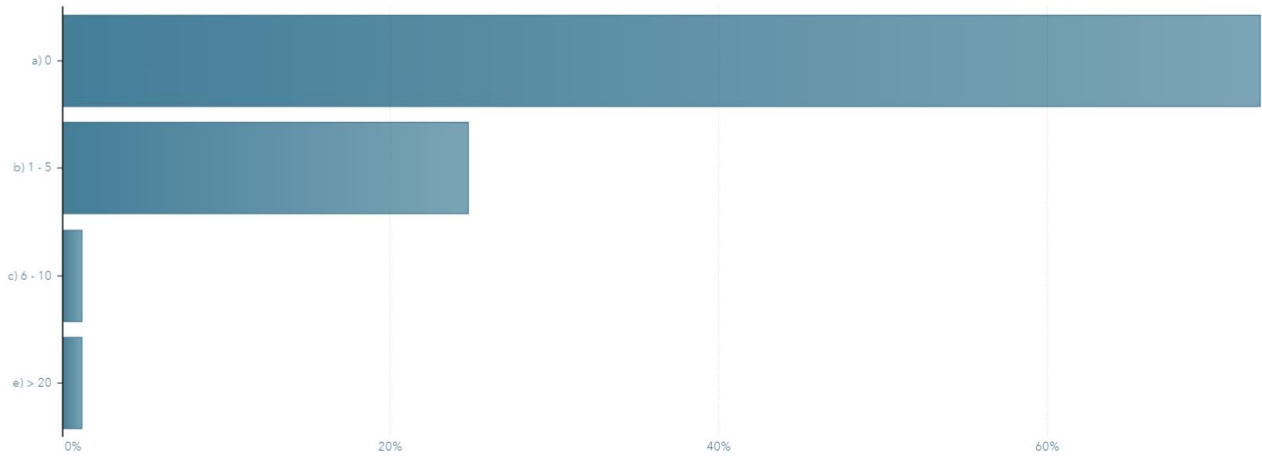


Question 23: comparison with earlier results

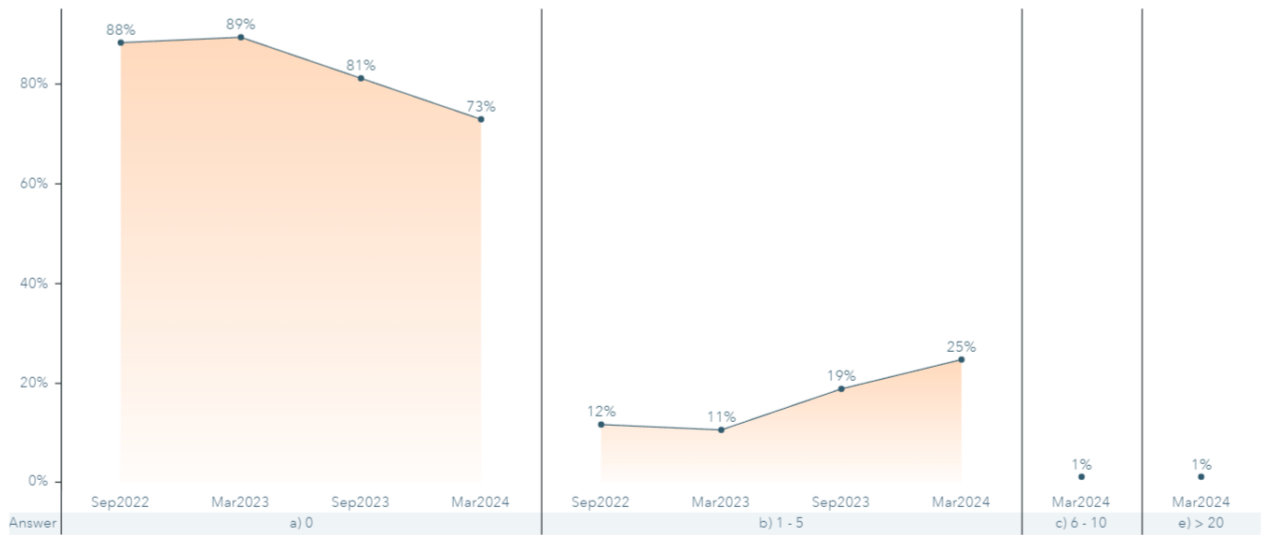


Question 24: Spring 2024 results

Q24 How many successful cyber-attacks resulting in "major ICT-related incidents"* have you faced in the period from 1 July to 31 December 2023 (considering the highest level of consolidation)?



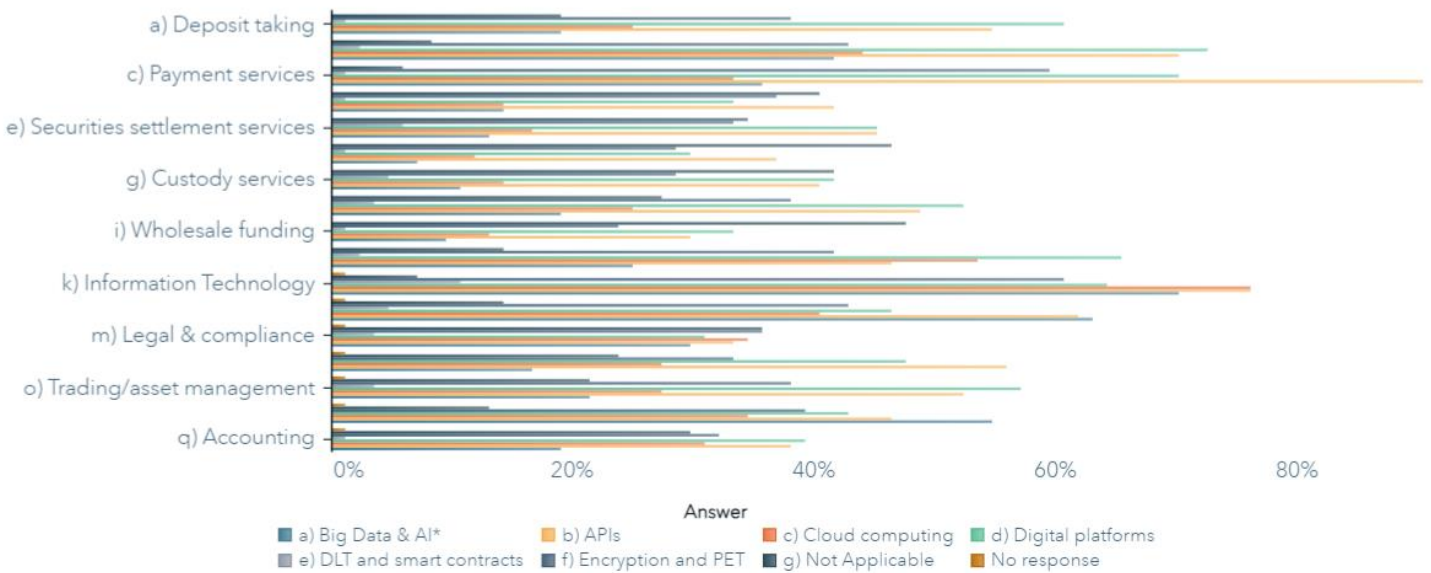
Question 24: comparison with earlier results



5. FinTech

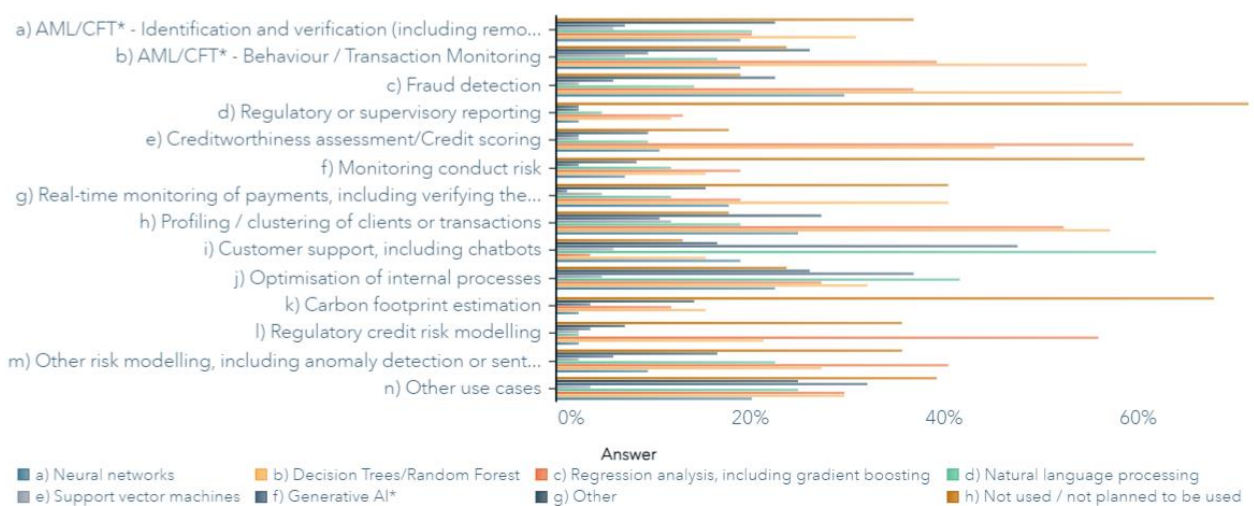
Question 25: Spring 2024 results

Q25 Please indicate the technologies your bank uses for the following activities.



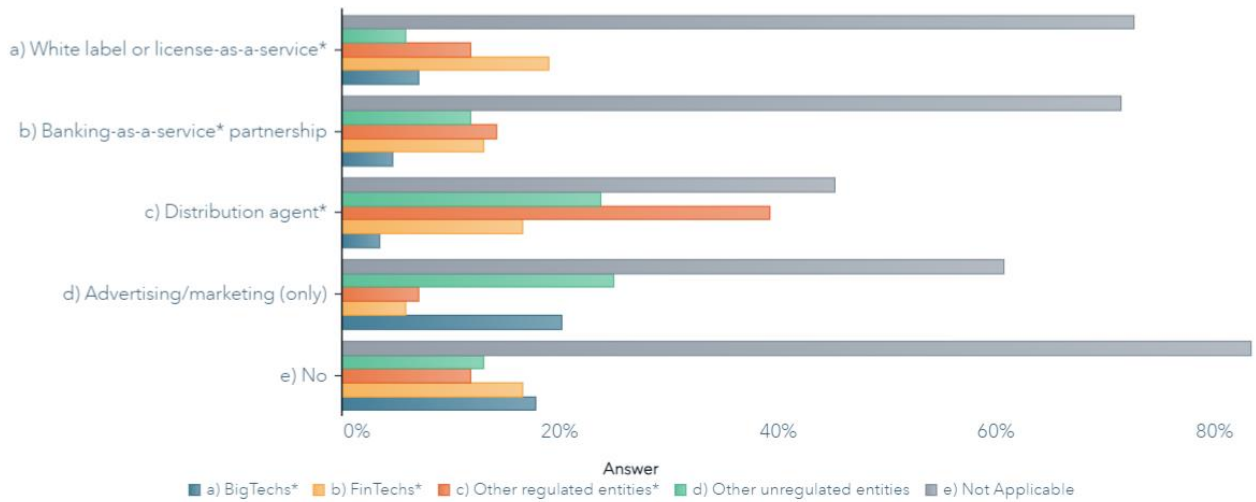
Question 26: Spring 2024 results

Q26 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?



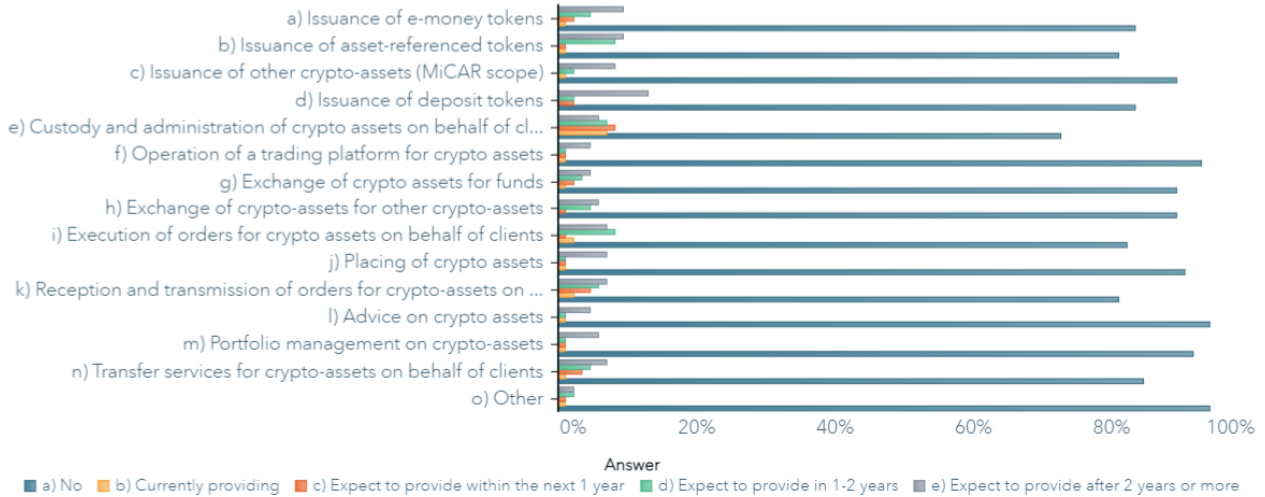
Question 27: Spring 2024 result

Q27 Please indicate whether you have entered (or are planning to enter) into any agreement with the following entities for the distribution of financial services and products issued by your bank.



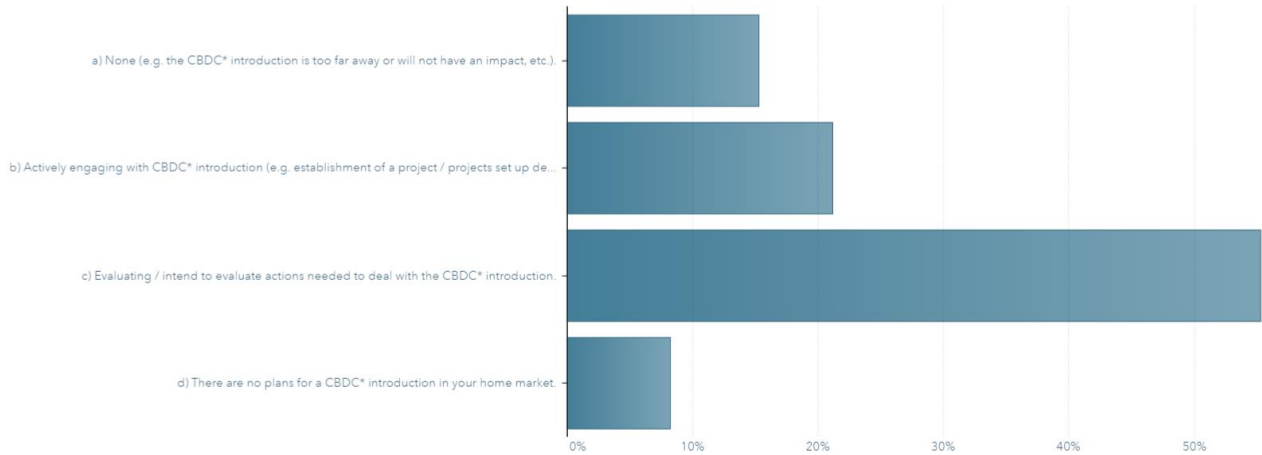
Question 28: Spring 2024 results

Q28 Are you providing, or do you expect to provide any of the following crypto-asset products and services to retail or wholesale clients within the next years?



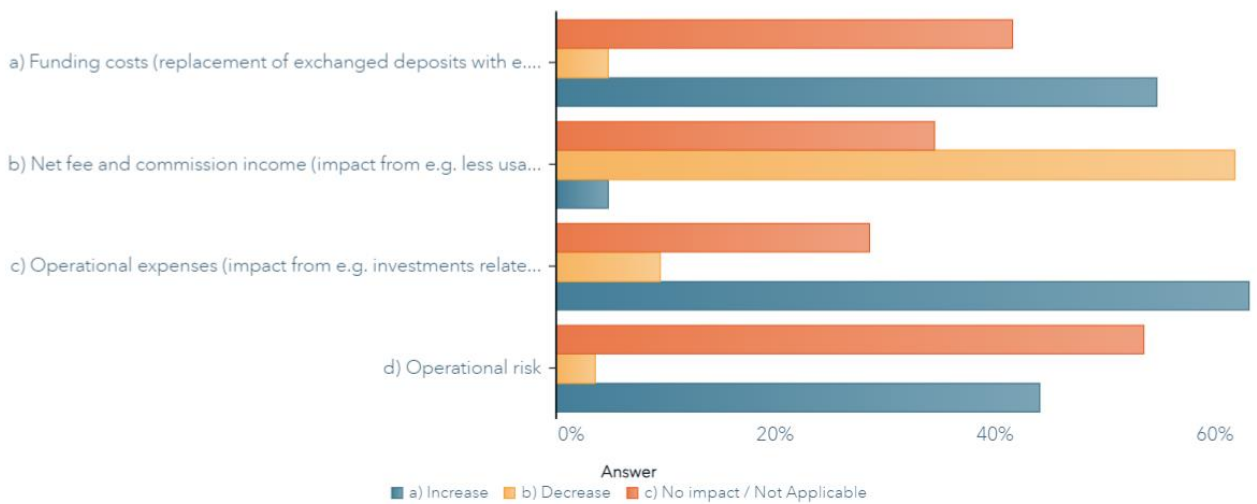
Question 29: Spring 2024 results

Q29 What is your level of engagement with CBDC* (this refers to what you would define as your home market)?



Question 30: Spring 2024 results

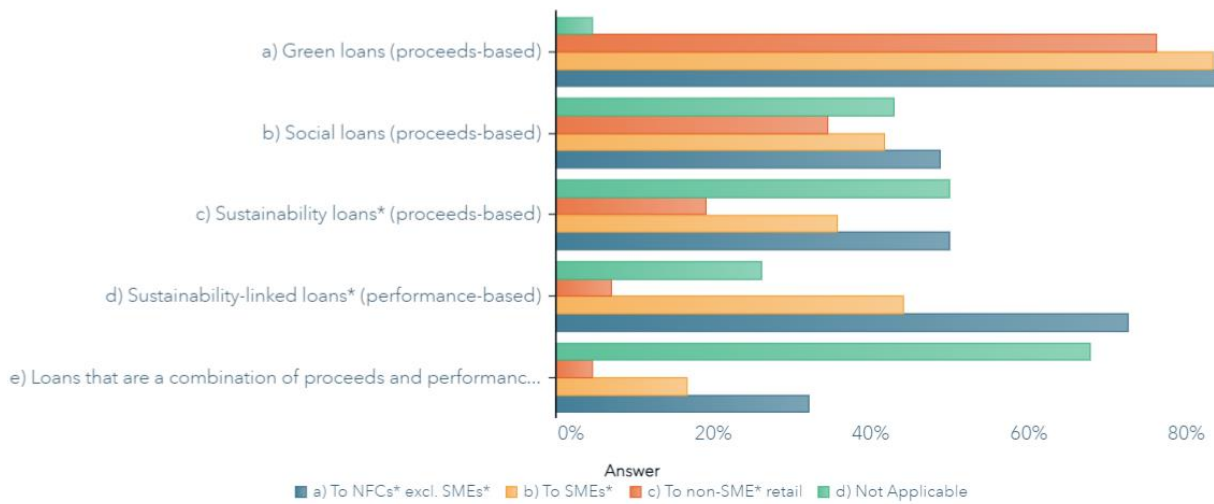
Q30 In which of the following areas (if any) do you expect a positive / negative impact from the introduction of CBDCs* (this refers to what you would define as your home market)?



6. Environmental Social and Governance (ESG) Finance

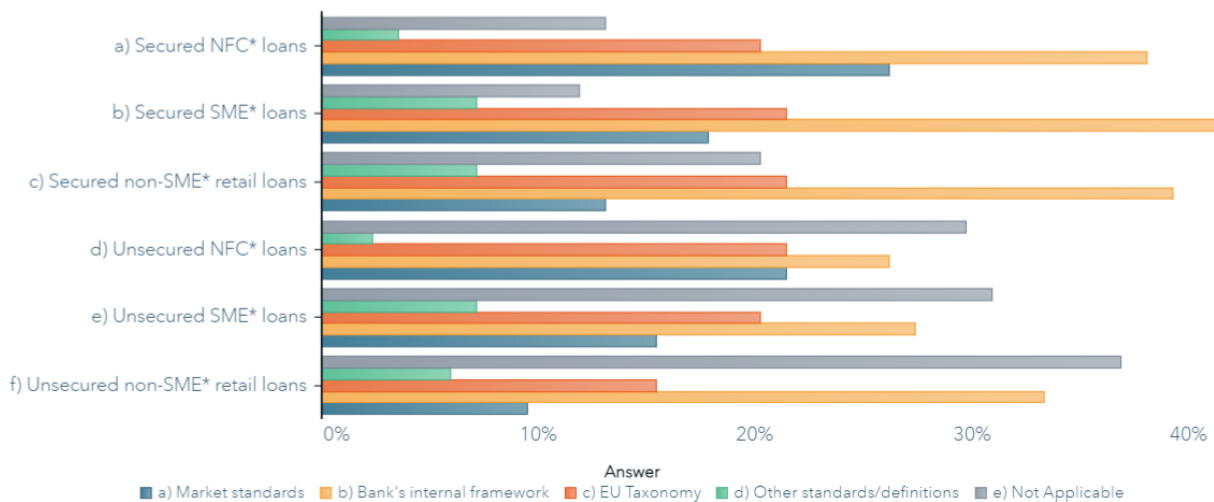
Question 31: Spring 2024 results

Q31 Which of the following loans, if any, are you offering to your clients?³



Question 32: Spring 2024 results

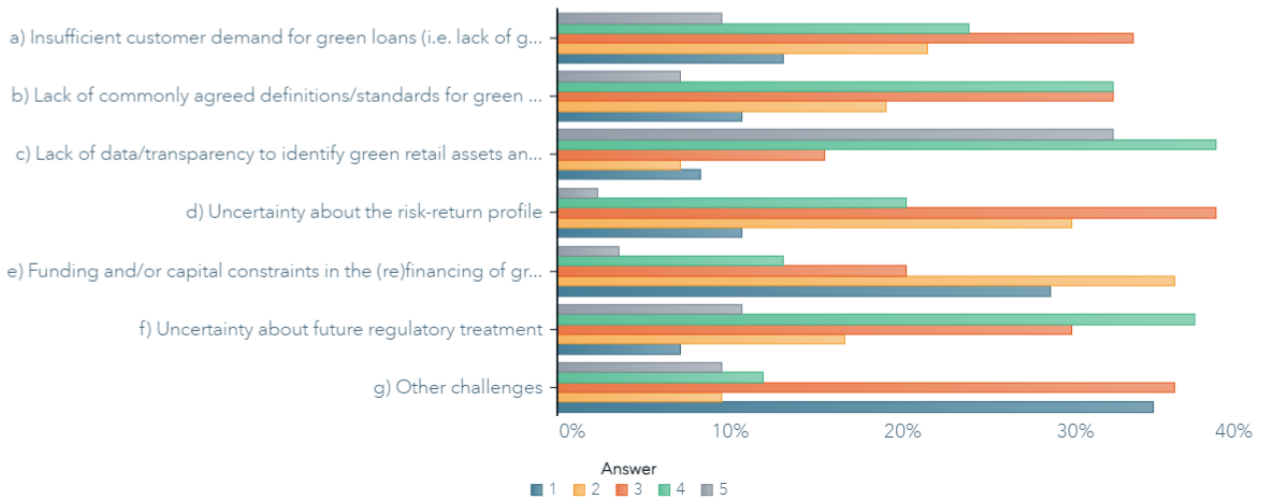
Q32 If you are offering 'green' loans to customers, which criteria/definition of green are you using for the following instruments?



³Please note the differentiation between proceeds-based and performance-based products, as to avoid double counting.

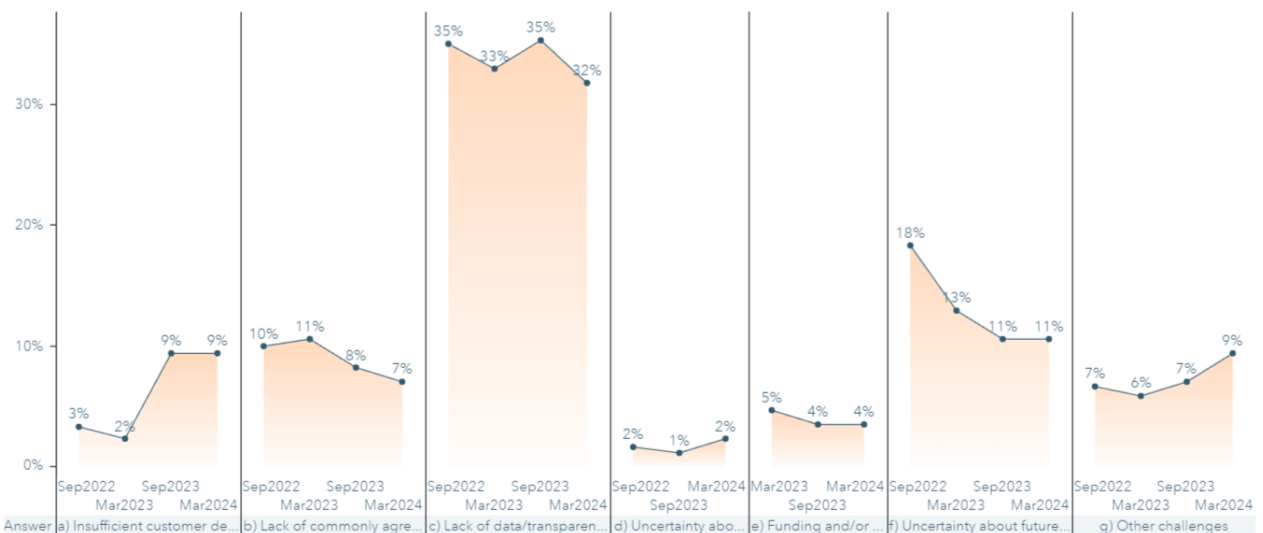
Question 33: Spring 2024 results

Q33 In your opinion, what are the main impediments to the further development of the market for green retail loans? (1 - Not relevant, 5 - Very relevant)



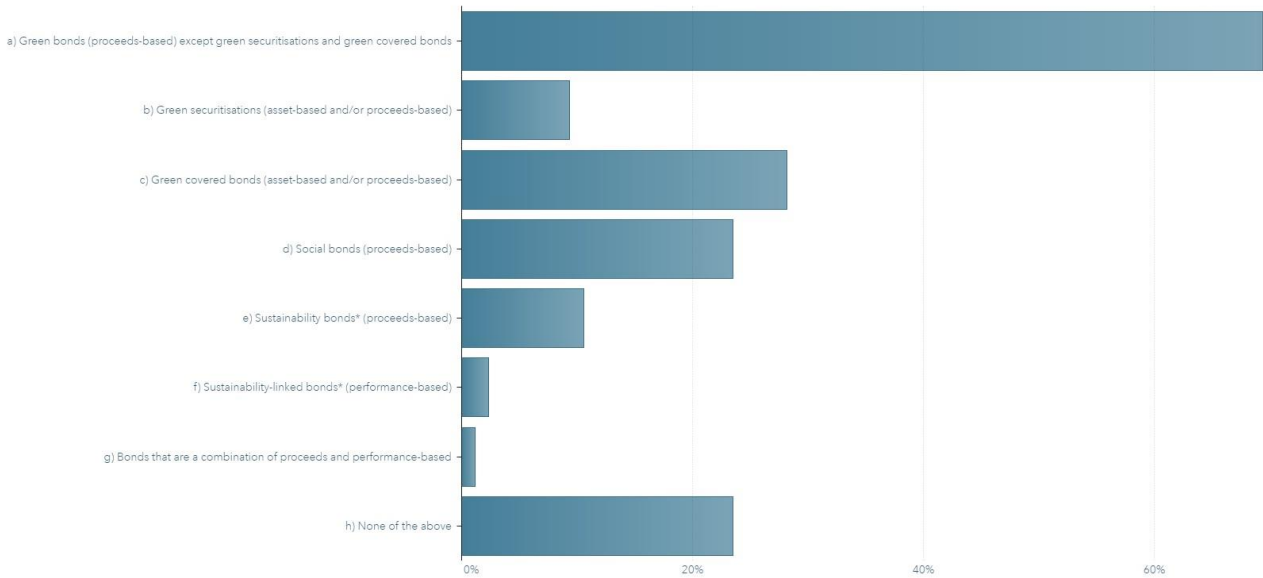
Question 33: comparison with earlier results

5 - Very relevant.

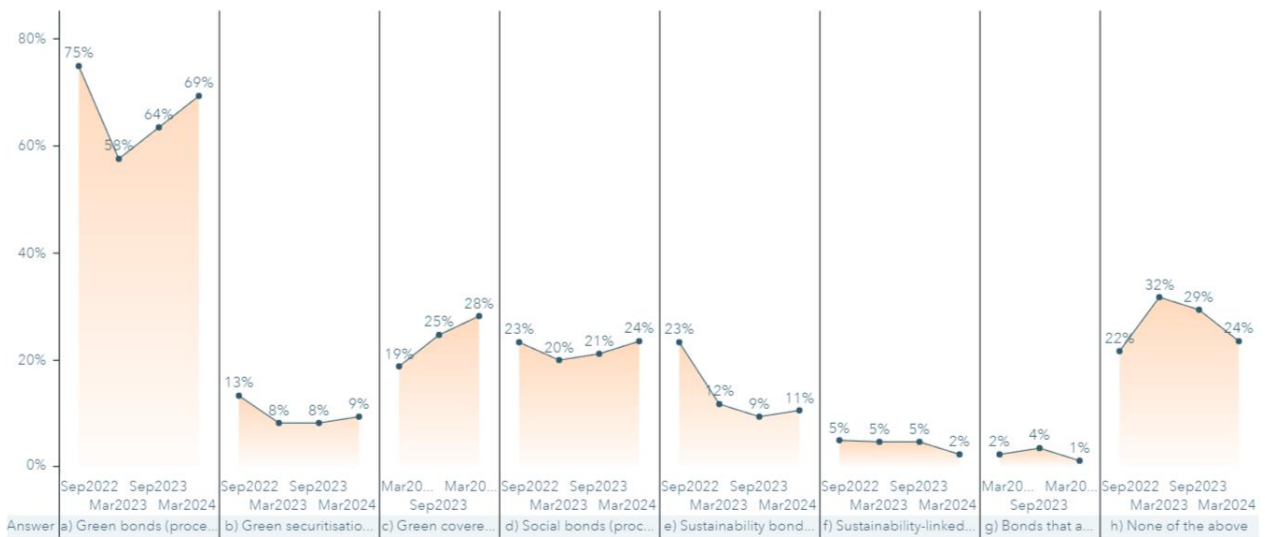


Question 34: Spring 2024 results

Q34 Which of the following instruments have you already issued?⁴



Question 34: comparison with earlier results



⁴ Please note the differentiation between proceeds-based and performance-based products, as to avoid double counting.

Annex: List of EU banks involved in RAQ

Financial Institution	Country
BAWAG Group AG	Austria
Erste Group Bank AG	Austria
Raiffeisen Bank International AG	Austria
Belfius Bank	Belgium
Crelan	Belgium
KBC Groep	Belgium
DSK Bank AD	Bulgaria
First investment Bank AD	Bulgaria
Privredna Banka Zagreb d.d.	Croatia
Zagrebačka banka d.d.	Croatia
Bank of Cyprus Holdings Public Limited Company	Cyprus
Hellenic Bank Public Company Ltd	Cyprus
Česká spořitelna, a.s.	Czechia
Československá obchodní banka, a.s.	Czechia
Komerční banka, a.s.	Czechia
Danske Bank A/S	Denmark
Jyske Bank A/S	Denmark
Nykredit Realkredit A/S	Denmark
AS LHV Group	Estonia
Luminor Holding AS	Estonia
Nordea Bank Abp	Finland
OP Osuuskunta	Finland
BNP Paribas	France

Financial Institution	Country
Confédération Nationale du Crédit Mutuel	France
Groupe BPCE	France
Groupe Crédit Agricole	France
La Banque Postale	France
Société générale S.A.	France
Bayerische Landesbank	Germany
Commerzbank AG	Germany
Deutsche Bank AG	Germany
DZ BANK AG Deutsche Zentral-Genossenschaftsbank, Frankfurt am Main	Germany
Landesbank Baden-Württemberg	Germany
Landesbank Hessen-Thüringen Girozentrale	Germany
Norddeutsche Landesbank - Girozentrale -	Germany
Alpha Services and Holdings S.A.	Greece
Eurobank Ergasias Services and Holdings S.A.	Greece
National Bank of Greece, S.A.	Greece
Piraeus Financial Holdings	Greece
MKB bankcsoport	Hungary
OTP - Csoport	Hungary
Íslandsbanki hf.	Iceland
Arion Banki hf.	Iceland
AIB Group plc	Ireland
Bank of Ireland Group plc	Ireland
Citibank Europe	Ireland
Banca Monte dei Paschi di Siena S.p.A.	Italy
Banco BPM S.p.A.	Italy

Financial Institution	Country
BPER Banca S.p.A.	Italy
Iccrea Banca S.p.A.	Italy
Intesa Sanpaolo S.p.A.	Italy
Unicredit S.p.A.	Italy
AS SEB banka	Latvia
Swedbank Baltics AS	Latvia
Akcinė bendrovė Šiaulių bankas	Lithuania
Revolut Bank UAB	Lithuania
Banque et Caisse d'Epargne de l'Etat, Luxembourg	Luxembourg
Banque Internationale à Luxembourg	Luxembourg
Bank of Valletta Plc	Malta
HSBC Bank Malta p.l.c.	Malta
ABN AMRO Bank N.V.	Netherlands
Coöperatieve Rabobank U.A.	Netherlands
de Volksbank N.V.	Netherlands
ING Groep N.V.	Netherlands
DNB Bank ASA	Norway
SpareBank 1 SR-Bank ASA	Norway
Bank Polska Kasa Opieki S.A.	Poland
Powszechna Kasa Oszczedności Bank Polski S.A.	Poland
Banco Comercial Português, SA	Portugal
Caixa Geral de Depósitos, S.A.	Portugal
Banca Comercială Română SA	Romania
Banca Transilvania	Romania
Slovenská sporiteľňa, a.s.	Slovakia
Všeobecná úverová banka, a.s.	Slovakia

Financial Institution	Country
OTP Luxembourg S.a.r.l.	Slovenia
Nova Ljubljanska Banka d.d., Ljubljana	Slovenia
Banco Bilbao Vizcaya Argentaria, S.A.	Spain
Banco de Sabadell, S.A.	Spain
Banco Santander, S.A.	Spain
Bankinter, S.A.	Spain
CaixaBank, S.A.	Spain
Unicaja Banco, S.A.	Spain
Skandinaviska Enskilda Banken - gruppen	Sweden
Svenska Handelsbanken - gruppen	Sweden
Swedbank - Grupp	Sweden

Appendix: Risk Assessment Questionnaire for banks



EBA Risk Assessment Questionnaire for Banks - Spring 2024

Fields marked with * are mandatory.

Respondent information

* Financial Institutions

* EU/EEA member state

* Contact e-mail address

Words in the Questionnaire marked with an asterisk () are further explained in the glossary*

Please note the EBA Risk Assessment Questionnaire booklet, which summarises the aggregate results of the survey (see the last version [here](#)), will include the list of participating banks. Bank by bank results will not be disclosed.

I agree with EBA privacy notice

[EBA_RAQ_Privacy_notice.pdf](#)

Business model, Strategy and 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	Not Applicable
* a) Net interest income	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) Net fee and commission income	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Other operating income	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Operating expenses / costs reduction	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e) Impairments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* f) Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q3 How do you expect the interest rate environment to affect your P&L over the next 6 to 12 months?

	a) Increase	b) Stable	c) Decrease	d) No opinion
* a) Overall profitability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) Net interest income	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Net fee and commission income	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Net trading income	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e) Impairments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Q4 What is your estimated Cost of Equity*?

- a) < 6% d) ≥ 10% and < 12%
 b) ≥ 6% and < 8% e) ≥ 12%
 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 reduction
- b) Outsourcing
- c) Off-shoring or near-shoring
- d) Reducing business activities (business lines and locations, incl. branches)
- e) Increasing automatisisation and digitalisation
- f) Other

*** Q6 Are you considering M&A transactions with/of?**

at most 2 choice(s)

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

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

	a) 0% -20%	b) 20% -40%	c) 40% -60%	d) 60% -80%	e) 80% -100%	Not Applicable
* a) CRE*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) SME*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Residential Mortgage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Consumer Credit	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e) Large Corporates*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8 Which is the average interest rate fixation period* for the following loan portfolios (at origination)?

	a) ≤1 year	b) >1 year and ≤3 years	c) >3 years and ≤5 years	d) >5 years and ≤10 years	e) >10 years	Not Applicable
* a) CRE*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) SME*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Residential Mortgage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Consumer Credit	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e) Large Corporates*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*** Q9 Where do you see the main risks stemming from interlinkages with NBFIs*?**

at most 2 choice(s)

- a) Risks related to direct exposures to NBFIs*, such as loans or bonds.
- b) Risks related due to wholesale funding from NBFIs* (i.e. NBFIs* investing in bank bonds).
- c) Risks related due to deposits incl. repo funding received from NBFIs*.
- d) Risks related to other direct linkages, such as derivatives or similar.
- e) Risks related to indirect exposures to NBFIs*.
- Risks are rather related to NBFIs* affecting financial markets that can then spread also into the banking sector (indirect links).
- g) Risks related to NBFIs* ownership as well as step-in risks*.
- h) No major risks stemming from NBFIs* are foreseen.

Funding and Liquidity*** Q10 In the next 12 months, which funding instruments do you intend to focus on?**

at most 2 choice(s)

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

Q11 In the next 12 months, which are your expectations on the costs (spreads) for your bank for the following funding sources?

	a) Increase	b) Decrease	c) Stable	d) No Opinion
* a) Preferred senior unsecured	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) Senior non-preferred / Senior HoldCo*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Subordinated debt including AT1/T2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Secured (e.g. covered bonds)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e) Securitisations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* f) Wholesale deposits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* g) Retail deposits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* h) Central bank funding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* i) Short-term interbank	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* j) CET1 instruments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q12 Which of the following actions are you considering in relation to deposits (sight and term) and current accounts?

	a) Increase	b) Decrease	c) Stable	d) Not applicable
* a) Rates for household deposits or current accounts*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) Rates for NFC* deposits or current accounts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Fees for household deposits or current accounts* and related services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Fees for NFC* deposits or current accounts and related services*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q13 What is your expectation on the level of deposit beta* for each of the following portfolios in the next 6 to 12 months?

	a) <10%	b) >10% and <=30%	c) >30% and <=50%	d) >50% and <=70%	e) >70%	f) Not Applicable
* a) Sight retail deposits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) Term retail deposits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Sight corporate deposits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* d) Term corporate deposits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e) Overall deposit beta*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Asset composition and quality

Q14 Which portfolios do you plan to increase/decrease in volume during the next 12 months (on a net basis)?

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

Q15 Which portfolios do you expect to improve/deteriorate in asset quality in the next 12 months?

	a) Improve	b) Deteriorate	c) Stable	d) No Opinion
* a) CRE*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) SME*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Residential Mortgage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Consumer Credit	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e) Large Corporates*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* f) Trading	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* g) Structured Finance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* h) Sovereign and institutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* i) Project Finance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* j) Asset Finance*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* k) Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Q16 Which is your Cost of Risk* estimation for the current financial year?

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

* Q17 Do you have any provisioning overlays in place?

- a) Yes, at the level of IFRS 9 model parameters (i.e., PD, incl. SICR* assessment, LGD and/or EAD)
- b) Yes, at total ECL (expected credit loss) level
- c) No

* Q17.1 If you selected a) or b), which factors are the overlays associated to?

at most 2 choice(s)

- a) Model deficiencies
- b) COVID-19
- c) Inflation
- d) ESG risks
- e) Political uncertainties
- f) Other

* Q18 Which is the proportion of the total ECL (expected credit loss) amount that is recognised via provisioning overlays?

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

Conduct, Reputational and Operational risk

*** Q19 Over the past three years, how much has your firm paid out in the form of compensation, redress, litigation and similar payments (as percentage of equity*)?**

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

*** Q20 Which are the main drivers of operational risk?**

at most 3 choice(s)

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

Q21 How do you expect your Money Laundering and Terrorism Financing risks related to the following products / business lines to evolve in the next 6 to 12 months?

	a) Increase	b) Decrease	c) No impact	d) Not Applicable
* a) Corporate finance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) Trading and sales	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Retail banking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Commercial banking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e) Payment and settlement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* f) Agency services*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* g) Asset management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* h) Retail brokerage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* i) Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q22 Which key Money Laundering and Terrorism Financing 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) Politically Exposed Persons	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) Crypto Asset Services Providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Customers dealing in crypto-assets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Customers whose ownership and control structure is opaque or unduly complex	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e) Use of innovative technologies for Customer Due Diligence purposes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* f) 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* g) Customers' transactions received from, or sent to, jurisdictions that are subject to international sanctions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* h) Customers whose activities or leadership are publicly known to be associated with extremism or terrorism	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* i) Used for the laundering of the proceeds of frauds (incl. COVID-related fraud)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* j) Used for the laundering of the proceeds of tax crime	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* k) Used for the laundering of the proceeds of corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* l) Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*** Q23 How many cyber-attacks that resulted or could have potentially resulted in a "major ICT-related incident"* have you faced from 1 July to 31 December 2023 (considering the highest level of consolidation)?**

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

*** Q24 How many successful cyber-attacks resulting in "major ICT-related incidents"* have you faced in the period from 1 July to 31 December 2023 (considering the highest level of consolidation)?**

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

Financial Technology

Q25 Please indicate the technologies your bank uses for the following activities.

	a) Big Data & AI*	b) APIs	c) Cloud computing	d) Digital platforms	e) DLT and smart contracts	f) Encryption and PET	g) Not Applicable
* a) Deposit taking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* b) Lending	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* c) Payment services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* d) Cash services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* e) Securities settlement services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* f) CCP* clearing services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* g) Custody services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* h) Capital markets activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* i) Wholesale funding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

j) Human Resources support	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* k) Information Technology	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* l) Transaction processing & AML/CFT*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* m) Legal & compliance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* n) Treasury services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* o) Trading /asset management	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* p) Risk management & valuation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* q) Accounting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

* m) Other risk modelling, including anomaly detection or sentiment analysis	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* n) Other use cases	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q27 Please indicate whether you have entered (or are planning to enter) into any agreement with the following entities for the distribution of financial services and products issued by your bank.

	a) BigTechs*	b) FinTechs*	c) Other regulated entities*	d) Other unregulated entities	e) Not Applicable
* a) White label or license-as-a-service*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* b) Banking-as-a-service* partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* c) Distribution agent*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* d) Advertising /marketing (only)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* e) No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q28 Are you providing, or do you expect to provide any of the following crypto-asset products and services to retail or wholesale clients within the next years?

	a) No	b) Currently providing	c) Expect to provide within the next 1 year	d) Expect to provide in 1-2 years	e) Expect to provide after 2 years or more
* a) Issuance of e-money tokens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) Issuance of asset-referenced tokens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Issuance of other crypto-assets (MiCAR scope)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Issuance of deposit tokens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Custody and administration of crypto assets on behalf of clients	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e) Operation of a trading platform for crypto assets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* f) Exchange of crypto assets for funds	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* g) Exchange of crypto-assets for other crypto-assets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* h) Execution of orders for crypto assets on behalf of clients	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* i) Placing of crypto assets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* j) Reception and transmission of orders for crypto-assets on behalf of clients	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* k) Advice on crypto assets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* l) Portfolio management on crypto-assets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* m) Transfer services for crypto-assets on behalf of clients	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* n) Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*** Q29 What is your level of engagement with CBDC* (this refers to what you would define as your home market)?**

- a) None (e.g. the CBDC* introduction is too far away or will not have an impact, etc.).
- b) Actively engaging with CBDC* introduction (e.g. establishment of a project / projects set up dealing with the expected impact on processes, IT, etc.).
- c) Evaluating / intend to evaluate actions needed to deal with the CBDC* introduction.
- d) There are no plans for a CBDC* introduction in home market.

Q30 In which of the following areas (if any) do you expect a positive / negative impact from the introduction of CBDCs* (this refers to what you would define as your home market)?

	a) Increase	b) Decrease	c) No impact / Not Applicable
* a) Funding costs (replacement of exchanged deposits with e.g. wholesale or central bank funding)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) Net fee and commission income (impact from e.g. less usage of payment services or due to clients' account closures, or through e.g. expanded range of product offerings, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Operational expenses (impact from e.g. investments related to CBDC* introduction, costs associated with cash distribution, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Operational risk	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Environmental, Social and Governance (ESG) Finance

Q31 Which of the following loans, if any, are you offering 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.

	a) To NFCs* excl. SMEs*	b) To SMEs*	c) To non-SME* retail	d) Not Applicable
* a) Green loans (proceeds-based)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* b) Social loans (proceeds-based)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* c) Sustainability loans* (proceeds-based)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* d) Sustainability-linked loans* (performance-based)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* e) Loans that are a combination of proceeds and performance-based	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q32 If you are offering "green" loans to customers, which criteria/definition of "green" are you primary using for the following instruments?

	a) Market standards	b) Bank's internal framework	c) EU Taxonomy	d) Other standards /definitions	e) Not Applicable
* a) Secured NFC* loans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) Secured SME* loans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) Secured non-SME* retail loans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) Unsecured NFC* loans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e) Unsecured SME* loans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* f) Unsecured non-SME* retail loans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q33 In your opinion, what are the main impediments to the further development of the market for green retail loans? (1 - Not relevant, 5 - Very relevant)

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

*** Q34 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 and green covered bonds
- b) Green securitisations (asset-based and/or proceeds-based)
- c) Green covered bonds (asset-based and/or proceeds-based)
- d) Social bonds (proceeds-based)
- e) Sustainability bonds* (proceeds-based)
- f) Sustainability-linked bonds* (performance-based)
- g) Bonds that are a combination of proceeds and performance-based
- h) None of the above

Glossary – EBA Risk Assessment Questionnaire

Term	Definition/Explanation
Agency services	These may include services such as custody, corporate agency, corporate trust
AI	Artificial intelligence
AML/CFT	Anti-money laundering / countering the financing of terrorism
Asset Finance	These may include for example finance towards shipping, aircrafts etc.
Banking-as-a-service	Bank's services integrated into a third party's ecosystem providing access to the services but not necessarily with third party's brand
BigTech	A large technology company whose primary activity is the provision of digital services
CBDC	Central bank digital currency
CCP	Central Counterparty Clearing House
Cost of Risk	Change in allowances and provisions as a ratio of total loans and advances subject to impairment
CRE	Commercial Real Estate (including all types of real estate developments)
Deposit beta	Estimation on the sensitivity of cost of new deposits to changes in central bank rates (e.g. the ECB deposit rate) on your key home market
Distribution agent	Third party distributes bank products and services on behalf of the bank and with bank branding
Equity	Please use the definition of the applied accounting standard
FinTech	Technologically enabled financial innovation that could result in new business models, applications, processes, or products with an associated material effect on financial markets and institutions and the provision of financial services' (Financial Stability Board)
Household deposits or current accounts	These may include for example payments or transfer of funds, direct debits, standing orders, annual or monthly fees, issuance fees for debit cards, etc.
Interest rate fixation period	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
Large Corporates	NFCs other than small medium-sized enterprises (SMEs) and Commercial Real Estate (CREs)
License-as-a-service	Bank's product/service but branded by a third party
Major ICT-related incidents	An ICT-related incident that has a high adverse impact on the network and information systems that support critical or important functions of the financial entity (Article 3(10) of Regulation (EU) 2022/2554 on digital operational resilience for the financial sector)

NBFI	Non Banking Financial Institutions/ intermediaries such as investment firms, investment funds, insurance companies, pension funds, collective investment undertakings, and clearing houses as well as remaining financial intermediaries, financial auxiliaries and captive financial institutions and money lenders
NFC	Non-financial corporate
NFCs deposits or current accounts and related services	These may include for example payments or transfer of funds, direct debits, standing orders, annual or monthly fees, etc.
Other regulated entities	Authorised pursuant to financial services regulation
PET	
Senior HoldCo	Senior Holding Company Funding
SME	Small and medium-sized enterprise
SICR	Significant Increase in Credit Risk as defined in IFRS9
Step-in risk	This is the risk related to the provision of financial support that a bank might provide to an unconsolidated entity that is facing stress even though there are no contractual or similar obligations to provide such support. A key reason for step-in risk is to reduce reputational risks that a bank could suffer if it does not provide respective support. See the BCBS's Guidelines on the identification and management of step-in risk (in particular para 14).
Sustainability bonds/loans	Any combination of environmental, social and/or governance dimensions
Sustainability-linked bonds/loans	Bonds/loans linked to sustainability performance objectives/specific KPIs reflecting any combination of environmental, social and/or governance dimensions
White label or license-as-a-service	Bank's product/service branded by a third party



Tour Europlaza, 20 avenue André Prothin CS 30154

92927 Paris La Défense CEDEX, FRANCE

Tel. +33 1 86 52 70 00

E-mail: info@eba.europa.eu

<https://eba.europa.eu>