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# 2025 EU-WIDE STRESS TEST

TEMPLATE GUIDANCE

5 JULY 2024

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# 1. Introduction and general remarks

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## 1.1 Objective of this guidance

1. The purpose of this document is to provide technical guidance, together with the Methodological Note, to the participating banks for populating the set of templates for the 2023 EU-wide stress test. This document will not provide any definitions or requirements that go beyond the ones given in the Methodological Note. If there are cases where the guidance contradicts the requirements from the Methodological Note, the latter prevails.
2. Each of the Methodological Note's chapters has a subchapter on the scope of application, on the definitions used in the chapter and on reporting requirements. Most of the information needed for the population of the templates is included in the Methodological Note - in particular in the sub sections on the scope of application, on the definitions used in the chapter and on reporting requirements. Their content will thus not be restated in this guidance. This document should therefore be read in conjunction with the Methodological Note.
3. Any abbreviations used in this document are defined in the Methodological Note.
4. The first section of this document covers general topics such as template types, data input and formats and supervisory reporting standards applied. The remainder of this document is structured following the order of the templates according to the file '2023 EU-wide Stress Test-Templates'.
5. Each template is covered in a separate section containing a summary of the purpose and data of the template, followed by a description of its structure, i.e. what information is contained in rows and columns. If any specific definitions or requirements are applicable to this template this is then covered in the following paragraph. Finally, links of the template with other templates are outlined.

## 1.2 Overview of the templates

6. The 2023 EU-wide Stress Test templates are grouped into the following template types:
  - Instructions: Template which gives general information on how to populate the templates and also indicates the version number of the file;

- Input: Template into which banks are requested to enter basic information such as the bank's name, material countries and country / currency combinations, currency breakdowns, and prescribed NFCI growth rate parameters;
- Calculation Support and Validation data (CSV): Templates which, with the exception of certain summary templates, are to be populated by the participating banks and in some areas contain the stress test calculation. These templates will be used to populate the transparency templates;
- Transparency (TRA): Data on stress test outcomes to be disclosed on a bank-by-bank basis along with the publication of the stress test results. The TRA templates are populated automatically.

7. Table 1 and Table 2 below include an overview over all the templates. Banks will have to populate the Input table and all CSV templates, except the CSV optional templates as explained below in paragraph 9.

Table 1: Overview of the CSV Templates

Section or topic	Template name	Description
N/A	Instructions	Summary of templates and colour code applied
N/A	Input	Input of bank name and relevant countries for credit risk, country/currency pairs for NII and currency breakdowns of Other remaining administrative expenses and NFCI, and prescribed NFCI growth rate parameters
Credit risk	CSV_CR_SUM	Credit risk – Summary
Credit risk	CSV_CR_SCEN	Credit risk – Scenarios (projection for credit risk losses)
Credit risk	CSV_CR_SECTOR	Exposures by sector of economic activity
Credit risk	CSV_CR_REA	Credit risk – REA
Credit risk	CSV_CR_REA_IRB	REA – IRB approach floor
Credit risk	CSV_CR_REA_STA	REA – STA floor
Credit risk	CSV_CR_REA_OF	S-TREA for IRB exposures moving to the STA approach for output floor calculation
Credit risk	CSV_CR_COVID19	Credit risk – COVID-19 public guarantees
Credit risk	CSV_CR_SEC_SUM	Securitisations – Summary
Credit risk	CSV_CR_SEC	Securitisations
Credit risk	CSV_CR_NPL	NPL calendar
Market risk, CCR losses and CVA	CSV_MR_SUM	Market risk – Summary

Section or topic	Template name	Description
Market risk, CCR losses and CVA	CSV_MR_FULL_REVAL	Market risk – Full revaluation
Market risk, CCR losses and CVA	CSV_MR_RESERVE	Market risk – Revaluation of reserves
Market risk, CCR losses and CVA	CSV_MR_PROJ	Market risk – Projection of client revenues of items held with a trading intent and their related hedges
Market risk, CCR losses and CVA	CSV_MR_CCR	Market risk – Counterparty defaults
Market risk, CCR losses and CVA	CSV_MR_REA	REA – Market risk
NII	CSV_NII_SUM	NII – Summary
NII	CSV_NII_CALC	NII – Calculation
NII	CSV_NII_CACL_MATCH_FUNDING	NII – Calculation for cases with funding matches
Conduct risk and other operational risks	CSV_OR_GEN	Conduct and other operational risk losses
Conduct risk and other operational risks	CSV_OR_CON	Material conduct risk losses
Non-interest income, expenses and capital	CSV_REA_SUM	REA – Summary
Non-interest income, expenses and capital	CSV_NFCI_DIV	Evolution of net fee and commissions income, dividend income
Non-interest income, expenses and capital	CSV_ONEOFF	Adjustments for non-recurring events (one-offs)
Non-interest income, expenses and capital	CSV_ORAE	Breakdown of other remaining administrative expenses
Non-interest income, expenses and capital	CSV_P&L	Evolution of P&L
Non-interest income, expenses and capital	CSV_CAP	Capital
Non-interest income, expenses and capital	CSV_MDA	Calculation of potential distribution restriction following breach of the MDA trigger level
Non-interest income, expenses and capital	CSV_CAPMEAS	Major capital measures and material losses

Table 2: Overview of the TRA Templates

Section or topic	Template name	Description
N/A	TRA_SUM	Summary adverse or baseline scenario (stress test results)
Credit risk	TRA_CR_STA	Credit risk (loss projection) STA
Credit risk	TRA_CR_IRB	Credit risk (loss projection) IRB

Section or topic	Template name	Description
Credit risk	TRA_CR_SEC	Credit risk – Securitisations (REA projection)
Non-interest income, expenses and capital	TRA_REA	REA (projection)
Non-interest income, expenses and capital	TRA_P&L	P&L (projection)
Non-interest income, expenses and capital	TRA_CAP	Capital (projection)
Non-interest income, expenses and capital	TRA_CAPMEAS	Major capital measures and material losses

8. Besides the instructions template, the majority of the transparency templates are not addressed in this document as they are automatically populated and are presented only for informational purposes.

9. There are two CSV templates whose population is optional:

- If a bank has not individuated any capital measure or material loss within the time horizons requested in the template CSV\_CAPMEAS, it does not have to populate the CSV\_CAPMEAS template;
- If a bank has no eligible one-off events to be taken into account in the stress test it does not have to populate the CSV\_ONEOFF template.

### 1.3 Data input and formats

10.No changes should be made to the sheets or the structure of the file, i.e. the only edits should be the input of data. In particular, the password-protection of the sheets should be left intact, and no columns or rows should be inserted, (re)moved or replaced. Sheets whose password-protection has been decrypted and after some modifications encrypted again cannot be processed by the EBA and will therefore be rejected.

11.The templates have a common colour code to flag different categories of cells, using the logic described in the figure below. Cells in light blue are used for the processing the stress test data provided by the banks, but have no direct relevance for banks.



Figure 1: Colour-scheme of different cells in the templates

	Input cell to be filled by participating banks
	Calculation cell within a sheet
	Links between sheets
	Not to be filled in
	Row header or column header
	Additional identifiers to be used for the data extraction - cells hidden with the exception of row and column numbers

12. If a field requires a text input, a drop-down menu is implemented in the respective template. The only exception to this rule is template CSV\_ONEOFF where some fields are free-text fields as they require descriptive information.
13. Monetary amounts should be reported in million euros (rounded to two decimal places) if not specifically indicated otherwise. When originally accounted in a currency different from euro the same exchange rates should be applied as for the COREP/ FINREP reporting.
14. Percentage data should be reported in the format 'X.XX%', i.e. not in decimals.
15. If the value required in a field amounts to 0, the respective field should be populated with 0 and not be left blank nor be populated with negligible amounts.

## 1.4 Supervisory reporting standards

16. All templates used in the 2025 EU-wide stress test refer to the specific version of supervisory reporting requirements in place as of 31 December 2024. This means, for all templates, the use of FINREP and COREP standards as for EBA reporting framework 3.2 (applicable for reports until 31 December 2024). Banks are required to restate some starting points and compute projections in accordance with CRR3/CRD6, as explained in relevant sections of the Methodological note and this document. In the case of resubmission of FINREP and COREP reports, templates should be filled in with the most updated data. When needed, banks should prove that a re-submission of FINREP/COREP is in process and explain the differences in the explanatory note.

## 2. Template specific guidance

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### 2.1 General information

#### 2.1.1 Input template

17. This template contains general information on the bank participating in the stress test. In this template, banks are required to select their bank's name and the most material countries for the reporting of credit risk data, the country / currency combinations for NII, as well as the currency breakdown of other remaining administrative expenses and NFCI, and the prescribed NFCI growth rate parameters.

18. The fields LEI and country of the selected bank will be populated automatically.

19. While in general the definitions of the Methodological Note apply, specific definitions to be highlighted for the use of this template comprise:

- The country fields in the credit risk table have to be populated according to section 2.3.4 of the Methodological Note;
- The country/currency fields in the NII table have to be filled according to section 4.3.6 Box 21 of the Methodological Note;
- The breakdown of other remaining administrative expenses has to be filled with the top 15 currencies in EUR amounts<sup>12</sup> net of average projected one-off adjustments (if any).<sup>3</sup> However, if 95% of the sum of all currencies have already been covered before filling the top 15 currencies, the bank has the option to report the remaining part in the "Other" (currencies) category. Banks using pro-forma data for other remaining administrative expenses shall provide a breakdown based on such data and include the (aggregate) difference between supervisory and pro-forma figures in the input sheet under cell E45 (while for all other banks this cell should be filled-in with zero); and

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<sup>1</sup> By contribution to the specific item and based on the relevant exchange rate at the cut-off date.

<sup>2</sup> Also if operating with only one currency.

<sup>3</sup> For example, if a bank has other remaining administrative expenses for GBP 100mn and a projected one-off adjustment (on other remaining administrative expenses) of GBP 10mn per year, it should fill the table with GBP 90mn denominated in EUR amounts as per applicable exchange rate.

- The breakdown of NFCI has to be filled with the top 15 currencies in EUR amounts.<sup>45</sup> However, if 95% of the sum of all currencies has already been covered before filling the top 15 currencies, the bank has the option to report the remaining part in the “Other” (currencies) category.

20. The Top 50 country / currency combinations in this template are linked via formula from this template to the CSV\_NII\_CALC template, the Top 10 country exposures are linked via formula from this template to the CSV\_CR\_SCEN and CSV\_CR\_REA templates. The Top 3 country exposures are linked via formula from this template to the CSV\_CR\_COVID19. Furthermore, the currency breakdown of NFCI is linked to the CSV\_NFCI\_DIV template, while the currency breakdown of other remaining administrative expenses is linked to the CSV\_P&L template.

21. The exchange rate variations in this template are linked to the evolution of interest income and expenses under CSV\_NII\_CALC and CSV\_NII\_CALC\_FUNDING MATCH, to the floor in other remaining administrative expenses under CSV\_P&L and to the evolution of NFCI in CSV\_NFCI\_DIV. The exchange rate variations will be provided in the templates for all countries that are covered by the macroeconomic scenario. This applies to the ‘Other’ currency as well, where provided exchange variations in the templates shall be used according to the share of exposures in scope of ‘Other’. Detailed information on these calculations shall be included in the explanatory note. Furthermore, banks shall populate their presentation currency in the INPUT template. The exchange rate variation will be computed accordingly.

22. The fields for the prescribed NFCI growth rates are to be filled with the bank specific growth rates transmitted to banks. The growth rates represent for each year of each of the baseline and adverse scenarios the prescribed cumulative path of NFCI relative to the starting point. In the adverse scenario, the three-year cumulative growth rate of NFCI is subject to a maximum and minimum reduction (floor/cap) constraints. In the baseline scenario, the three-year cumulative growth rate of NFCI is subject to maximum reduction (floor) constraint. These constraints, if binding, apply to each year of the corresponding scenario horizon and are already reflected in the prescribed growth rate parameters.

## 2.2 Credit Risk

### 2.2.1 CSV\_CR\_SUM

23. This template shows the credit risk P&L impact for all positions excluding securitisations. It is automatically populated (from CSV\_CR\_SCEN) and no data needs to be entered in this template.

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<sup>4</sup> Same as footnote 1

<sup>5</sup> Also if operating with only one currency.

24. The rows of the template show end of year information (e.g. distribution of exposures to stages, stock of provisions, coverage ratios), flows between stages, impairments and credit risk parameters. The columns include the breakdown by year and scenario.
25. The CSV\_CR\_SUM template calculates the total impairment losses, which is linked via formula from this template to the CSV\_P&L template.

### 2.2.2 CSV\_CR\_SCEN

26. In this template, banks are required to provide historical and projected credit risk information on exposure, LTV ratio, funded collateral, provisions and credit risk parameters broken down by asset class, regulatory approach, country of exposure, year and scenario. Moreover, the main credit risk stress test calculations are incorporated in this template. Banks are requested to provide “restated” data for 2024 by allocating their exposures as of 31 December 2024 to the exposure classes in accordance with CRR3. The restatement aims to align the starting point exposure class allocation with the exposure class allocation in the projections horizon, which considers the application of CRR3.
27. The columns of the template include all variables to be reported and are grouped into the sections ‘Beginning of year – Stocks’, ‘Within year - Flows and Parameters’, and ‘End of year – Stocks’.
28. The rows of the template are grouped by year, scenario, regulatory approach (A-IRB, F-IRB, STA), asset classes and geographical breakdown of the country of exposure. For the population of those fields the following applies:
- The asset classes refer to the ones described in section 2.3.3 of the Methodological Note. To consider the application of CRR3 for the stress test projections, the actual exposure classes differ from restated and adverse and baseline scenario exposure classes. Projections are performed based on the restated exposure classes;
  - The geographical breakdown field contains the following expressions: (i) ‘Total’, (ii) the Top 10 countries automatically populated based on the data entered in worksheet ‘Input’, and (iii) ‘Other’ for the residual not attributed to any country.
  - In contrast to data required for the projection horizon, for historical values a lower number of columns have to be populated with data from 2023 and 2024. Historical information (actual) considers the allocation of exposure classes according to the CRR version applicable on 31 December 2024. Restated information considers the allocation of exposure classes according to the CRR version applicable on 1 January 2025. These columns can also be found in section 2.3.4 of the Methodological Note (Table 2 and Table 3 for the actual historical information and Table 4 and Table 5 for the restated information).

- For stages that have zero exposure at the beginning of the exercise but for which there are exposure transitions towards that stage during the exercise,<sup>6</sup> credit risk parameters (TRs, LR, LGDs) should be reported in line with the hierarchies of approaches outlined in section 2.4.1 of the Methodological Note. This implies in particular that if there is performing exposure (S1 or S2) at the beginning of the exercise all parameters should be reported. Consequently, parameters for stages where no exposure is reported for the starting point should be estimated and reported using observed or modelled equivalent values (e.g. same or comparable country and asset class), once duly adjusted for the macroeconomic variables corresponding to the year of estimation. Notwithstanding this, if there is only S3 exposure at the beginning of the exercise, parameters affecting S1 or S2 exposures do not need to be filled. As stated in section 2.4.1 of the Methodological Note, the overarching principle is the parameter's suitability and comparability for projections.
- The parameters related to exposures or asset classes without associated credit risk (e.g. 'other non-credit obligation assets') shall reflect that absence of credit risk, i.e. 0% transitions rates, loss rates and LGDs shall be reported.
- According to paragraph 126 of the Methodological Note, ECB benchmark parameters have to be applied to an entire pivot asset class<sup>7</sup> if the coverage of existing satellite models is very low (i.e. if the banks' satellite models do not ensure the estimation of all the PD/TR and LR/LGD parameters, respectively, for a minimum of 10% of the pivot asset class exposure). The parameters reported at the level of a main asset class (e.g. Retail or Corporate) should be consistent with the parameters used in the respective pivot asset class.

29. While in general the definitions of the Methodological Note apply, specific definitions to be highlighted for the use of this template comprise:

- Credit risk relevant exposure is based on the CRR/CRD definition but should be always the amount before credit risk adjustments and should exclude all fair value positions (FVOCI and FVPL), which is in contrast to the REA-templates, and exposures subject to CCR.
- For the purpose of this template, securitisation positions are excluded (see section 2.2 of the Methodological Note).

30. While historical exposures and provisions have to be reported, the template calculates projected exposures and provisions out of starting point exposures / provisions and stressed

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<sup>6</sup> It is expected that this case can only occur in the starting point as transition rates should be non-zero during the exercise.

<sup>7</sup> Pivot asset class refers to the lowest level of aggregation (e.g. 'Corporates – SME - Secured by real estate property').

credit risk parameters. For this purpose, the CSV\_CR\_SCEN template contains the formulas to calculate provisions for the credit risk stress test (for all segments subject to the stress test, except securitisations) according to section 2.4.3 of the Methodological Note. As per paragraph 110 of the Methodological Note, management overlays that were created as a forward-looking provision before the cut-off date might be used to offset future expected losses during the stress test horizon.<sup>8</sup> Nevertheless, no release of accumulated provisions for S3 exposures is permitted for any year or scenario and this restriction shall be applied at exposure level (management overlays should not be negative). In addition, starting points need to be suitable for the scenario projections (paragraphs 113 and 119 of the Methodological Note). Data is linked via formula from the CSV\_CR\_SCEN template to the CSV\_CR\_SUM template. Moreover, exposure and impairment data is linked via formula from this template to the TRA\_CR\_IRB and TRA\_CR\_STA templates.

31.

32. Table 3 summarises the reporting requirements for the main credit risk variables in each year of the template.

Table 3: Reporting requirements for the main credit risk variables<sup>9</sup>

	Item	2023 BoY; 2023 EoY; 2024 BoY	2024 EoY	2025 BoY	2025-2027
Stocks	Exp S1	Actual	Actual	Actual with restated distribution across IFRS 9 stages <sup>10</sup>	Projected with ST definition <sup>11</sup>
	Exp S2				
	Exp S3				
	Prov Stock S1	Actual	Actual	Actual with restated distribution across IFRS 9 stages <sup>10</sup>	
	Prov Stock S2		Actual		
	Prov Stock S3		Actual <sup>11</sup>		

<sup>8</sup> To account for management overlays in the projections, provisions reported at the end of 2024 and the beginning of 2025 shall both be reported including management overlays. Thereby, possible conservatism in the provisioning at the cut-off date is considered in the calculation performed in the stress test templates as the total impairment losses (template CSV\_CR\_SUM) at the end of each period are computed as the difference with respect to the initial stocks of provisions.

<sup>9</sup> The terms actual and restated on this table refer to the IFRS9 stage allocation and follow the logic of paragraph 56 of the Methodological Note. The actual and restated in this table, do not refer to the actual and restated exposure classes to account for the application of CRR3 on 1 January 2025, which should also be taken into account in the reporting.

<sup>10</sup> Restatement to reflect the stress test definitions from paragraph 56 of the Methodological Note.

<sup>11</sup> Formula-based fields.

	<b>Prov old S3-S3</b>		Actual	N/A	
	<b>Prov SX-S3<sup>12</sup></b>		Actual		

	Item	2023	2024	2025-2027
<b>Flows</b>	<b>S2-S1 flows</b>	Actual	Actual	Projected with ST definition <sup>11</sup>
	<b>S1-S2 flows</b>			
	<b>S1-S3 flows<sup>13</sup></b>			
	<b>S2-S3 flows<sup>13</sup></b>			
<b>Parameters</b>	<b>Transition rates</b>	N/A	Modelled (according to par. 33)	Modelled (stress test scenario)
	<b>LGDs</b>			
	<b>Cure rates</b>			
	<b>Loss rates</b>			

33. According to paragraph 112 of the Methodological Note, for the estimation of starting point parameters (rows covering the year 2024 of the CSV\_CR\_SCEN template), only the baseline scenario shall be taken into account. In line with paragraph 69 of the Methodological Note, the historical stock of provisions as of end-of-year 2024 (both “actual” and “restated” in line with the application of CRR3 as of 1 January 2025) shall be the actual one in accordance with the bank’s accounting framework (e.g. based on a multi-scenario approach applied under IFRS 9). The beginning-of-year 2025 stock of provisions is related to a historical period but should be allocated in line with the distribution of exposure by stage restated in order to reflect the stress test definitions from to paragraph 56 of the Methodological Note (see

34. Table 3). As a consequence, it is expected that the stock of provisions both as of end-of-year 2024 and beginning-of-year 2025 will not match the 2024 risk parameters calculated based on paragraph 112 of the Methodological Note. Contrarily, the projected stock of provisions for end-of-year 2025, 2026 and 2027 shall consider risk parameters calculated in accordance with the (baseline/adverse) scenario provided and under the perfect foresight assumption. In order to support the process of quality assurance performed by the competent authorities, banks should provide in the explanatory note details on the weighted scenarios employed under IFRS 9 and the impact of the assumptions from paragraph 112 of the Methodological Note to the starting point risk parameters and provision coverage ratios.

35. According to paragraph 108 of the Methodological Note, the two lines (“of which: Residential guaranteed loans (Prêts cautionnés) insured by an eligible residential property loan guarantor” and “of which: other than Residential guaranteed loans (Prêts cautionnés) insured by an eligible residential property loan guarantor”) are intended to give details of the asset classes

<sup>12</sup> Consider the provisions allocated to exposures that moved to S3 and remained in S3 at the end of the respective year.

<sup>13</sup> Consider all transitions to S3 during the respective year (reported once in case it enters several times into S3).

“Retail Secured by residential real estate Non-SME” (A-IRB and F-IRB) and “Secured by mortgages on immovable property and ADC exposures Residential immovable property” (STA) regarding: (i) the exposures secured by residential real estate properties insured by an eligible residential property loan guarantor (first row); and (ii) the remaining exposures of the same asset class (second row). Under A- and F-IRB, the sum of the exposures and provisions relevant to these two “of which” rows should equal the exposures and provisions reported in the corresponding pivot level row “Retail Secured by residential real estate Non-SME”. Under STA, the sum of exposures and provisions of these two “of which” rows should also reconcile with the amounts reported in the corresponding pivot level row “Secured by mortgages on immovable property and ADC exposures Residential immovable property”. Hence, the sum of all “of which” rows under this asset class<sup>14</sup> might not reconcile with the values reported in the corresponding sum level row “Secured by mortgages on immovable property and ADC exposures Residential immovable property”. If a bank has no Retail non-SME exposure secured by residential real estate or “Secured by mortgages on immovable property and ADC exposures Residential immovable property” and insured by an eligible residential property loan guarantor, these two “of which” rows should be left blank. These rows shall not include the exposures falling under the COVID-19 public guarantee schemes, which will be reported in template CSV\_CR\_COVID19.

36. For the asset class STA “Secured by mortgages on immovable property and ADC exposures - Residential immovable property and Commercial immovable property” (pivot rows), banks are requested to report more granular information under a set of “of which” rows. The sum of the exposures and provisions, respectively, of all “of which” rows may not reconcile with the values on the pivot line. However, it is expected that the sum of the “of which” rows for “Non IPRE (Secured)”, “Non IPRE (Unsecured)” and “IPRE” reconciles with the values reported under the respective pivot rows. Similarly, for the asset class (pivot line) “Secured by mortgages on immovable property and ADC exposures Other” the sum of the “of which” rows “Non IPRE” and “IPRE” is expected to reconcile with the values reported under the respective pivot row.

37. The column ‘average maturity (yrs)’ is aggregated in ‘sum’ asset classes as an average of ‘pivot’ asset classes weighted by the respective performing exposure (i.e. non-performing exposure is assumed to have no defined maturity).

38. The columns related to transition rates are aggregated in ‘sum’ asset classes as an average of ‘pivot’ asset classes weighted by the respective exposure (e.g. TR<sup>1-3</sup> is weighted by the S1 exposure in the beginning of the period).

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<sup>14</sup> “of which: IPRE”, “of which: SME”, “of which: IPRE, of which: SME”, “of which: Residential guaranteed loans (Prêts cautionnés) insured by an eligible residential property loan guarantor”, “of which: other than Residential guaranteed loans (Prêts cautionnés) insured by an eligible residential property loan guarantor”



39. The columns related to loss rates, LGDs and cure rates are aggregated in 'sum' asset classes as an average of 'pivot' asset classes weighted by the respective exposure multiplied by the respective transition rates (e.g.  $LGD^{1-3}$  is weighted by the S1 exposure in the beginning of the period multiplied by  $TR^{1-3}$ ).
40. The column 'PD PiT (%)' shall be subject to a technical minimum floor of 0.001% for the starting point year 2024 in all cases where there exists non-zero 'Performing Exposure (Exp)' (either S1 or S2) of 'Beginning of year- Stocks'.

### 2.2.3 CSV\_CR\_SECTOR

41. In this template, banks are required to provide historical and projected credit risk information on exposure, LTV ratio, funded collateral, provisions and credit risk parameters broken down by year, scenario, country of exposure, and NACE sector. The scope of the asset classes of the exposures to be included in this template is described in the Methodological Note.
42. In general, the template follows the same calculation logic as implied in the template CSV\_CR\_SCEN. Therefore, unless specified otherwise in the following paragraphs, the same instructions provided for the template CSV\_CR\_SCEN apply.
43. In columns 1 "PD/TR - Percentage of exposures with projections based on sectoral models, e.g. via sensitivities by sector (%)" and 2 "LGD/LR - Percentage of exposures with projections based on sectoral models, e.g. via sensitivities by sector (%)" the banks should indicate the percentage of exposures for which the projections of sectoral risk parameters are obtained by using dedicated models that produce sector-specific risk parameters based on the sectoral dynamics prescribed by the scenario or by applying a reasonable loss distribution approach, e.g. sensitivities, to portfolio-level projections. The approach followed should be further described in the explanatory note.
44. The stress test scenario projects GVA only for the 27 EU countries, the euro area and the EU in aggregate terms. Since the list of countries reported in CSV\_CR\_SECTOR should match with CSV\_CR\_SCEN, this list might include non-EU countries depending on the geographical distribution of exposures of the bank. In this case, banks shall report exposures, provisions and parameters for the non-EU countries and are expected to document the approach used in the explanatory note. Banks should explain to what extent the assumptions and constraints used for sectoral projections for non-EU countries are consistent with the overall narrative of the ST macroeconomic scenario.
45. The rows of the template are grouped by year, scenario, country of exposure, and NACE sector of exposure.

- a) The sectoral breakdown contains the following expressions: (i) 'Total', (ii) the list of economic activities based on NACE codes, (iii) a memorandum item for corporate exposures in scope of this template, but which are reported as 'STA – Secured by mortgages on immovable property – and ADC exposures' and are not reported within the SME exposures in CSV\_CR\_SCEN.
- b) The list of economic activities covers all NACE sections (1-digit level) at varying granularity for which banks need to provide both historical and projected information. Additionally, banks have to provide a more granular breakdown of historical information for selected NACE divisions (2-digit level), which may not necessarily be exhaustive<sup>15</sup> with respect to the corresponding NACE sections (Table 4), Table 4. Under the breakdown 'Energy-intensive activities', banks shall report the NACE divisions listed in Table 4, whereas the breakdown 'other' shall encompass all activities in NACE section C excluding the aforementioned NACE divisions listed in Table 4.
- c) With regard to the NACE sections R-U (Arts, entertainment and recreation; other service activities; activities of households; activities of extra-territorial organisations and bodies) and for the starting points only, banks are required to provide a more granular breakdown of information for the NACE sections R-S (Arts, entertainment and recreation; other service activities) in the dedicated o/w rows.
- d) The template does not include a specific row for the exposures for which the sector is unknown. Banks shall report in the explanatory note the amount of exposures for which the attribution of a NACE sector was controversial, distinguishing the cases where multiple assignments were possible or those where the sector was unknown, and the criteria used to attribute a sector in the former cases.
- e) For the starting points, the total exposures and provisions at each country level reported in CSV\_CR\_SECTOR, including the distribution across IFRS stages, should be consistent with those reported in CSV\_CR\_SCEN.

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<sup>15</sup> As lists of the NACE divisions provided for these selected sectors are not meant to be exhaustive, the sum of the exposures and provisions reported for the NACE divisions for a given sector reported under "o/w" rows might not reconcile fully with the "pivot" row corresponding sector reported under the NACE section.

Table 4: List of NACE sectors

NACE sections	Selected NACE divisions
A Agriculture, forestry and fishing	
B Mining and quarrying	
C Manufacturing	C10-C11 Manufacture of food products and beverages
	C12 Manufacture of tobacco products
	C17 Manufacture of paper and paper products
	C18 Printing and reproduction of recorded media
	C19 Manufacture of coke and refined petroleum products
	C20 Manufacture of chemicals and chemical products
	C21 Manufacture of basic pharmaceutical products and pharmaceutical preparations
	C22-C23 Manufacture of rubber, plastic and other non-metallic mineral products
	C24-C25 Manufacture of basic metals and fabricated metal products, except machinery and equipment
	C26-C27 Manufacture of computer, electronic and optical products and electrical equipment
	C28 Manufacture of machinery and equipment (not elsewhere classified)
	C29-C30 Manufacture of motor vehicles, trailers, semi-trailers and other transport equipment
D Electricity, gas, steam and air conditioning supply	
E Water supply, sewerage, waste management and remediation activities	
F Construction	F41 Construction of buildings
	F42-F43 Civil engineering and specialised construction activities
G Wholesale and retail trade, incl. repair of motor vehicles and motorcycles	G46 Wholesale trade, except of motor vehicles and motorcycles

NACE sections	Selected NACE divisions
	G47 Retail trade, except of motor vehicles and motorcycles
H Transportation and storage	H49 Land transport and transport via pipelines
	H50-H51 Water and air transport
	H52-H53 Warehousing, support activities for transportation, postal and courier activities
I Accommodation and food service activities	I55 Accommodation
	I56 Food and beverage service activities
J Information and communication	
K Financial and insurance activities	
L Real estate activities	
M-N Professional, scientific and technical activities; administrative and support service activities	
O-Q Public administration and defence, compulsory social security; education; human health services and social work activities	
R-U Arts, entertainment and recreation; other service activities; activities of households; activities of extra-territorial organisations and bodies <sup>16</sup>	

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<sup>16</sup> For the starting points, banks are requested to provide information on the NACE sections R-Arts, entertainment and recreation and S-Other service activities in the dedicated o/w rows.

Table 5: List of energy-intensive manufacturing activities

NACE divisions
C.10 Manufacture of food products
C.11 Manufacture of beverages
C.12 Manufacture of tobacco products
C.16 Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials
C.17 Manufacture of paper and paper products
C.18 Printing and reproduction of recorded media
C.19 Manufacture of coke and refined petroleum products
C.20 Manufacture of chemicals and chemical products
C.22 Manufacture of rubber and plastic products
C.23 Manufacture of other non-metallic mineral products
C.24 Manufacture of basic metals
C.25 Manufacture of fabricated metal products, except machinery and equipment
C.28 Manufacture of machinery and equipment n.e.c.

#### 2.2.4 CSV\_CR\_REA

46. In this template, banks are required to provide credit risk information on exposure values, regulatory risk parameters, REA, and expected losses broken down by year, scenario, regulatory approach and asset class (rows). CSV\_CR\_REA\_STA and CSV\_CR\_REA\_IRB templates source the information from the CSV\_CR\_REA template. Banks shall restate the “Actual” exposure classes on 31 December 2024 to “Restated” exposure classes to account for the application of CRR3 on 1 January 2025. Exposures reported under the adverse and baseline scenario should also be allocated in accordance with the exposure classes that account for the application of CRR3.

47. The rows show the combinations of geographical breakdown, scenario, year, regulatory approach and asset classes. The columns show the different end of year exposure values, regulatory risk parameters, REA, EL and stock of provisions.

48. Exposure values in this template are defined according to COREP definitions in line with paragraph 87 Methodological Note and thus might differ from the exposure data (Exp) reported in the template CSV\_CR\_SCEN. For the STA portfolio, exposure values should hence be provided net of provisions. In line with paragraph 114 of the Methodological Note, REA reported in the CSV\_CR\_REA template as well as provisions reported in the CSV\_CR\_SCEN template should exclude, if applicable, IFRS9 transitional arrangements for the reporting of the historical numbers. The impact of the latter is considered separately in the calculation of the transitional capital ratios in the CSV\_CAP template. In line with paragraph 167 of the Methodological Note, the unfloored REA amounts for the “Restated” 2024 should be reported

net of transitional arrangements in accordance with Article 495d of the CRR3 but including other transitional arrangements. The impact of the transitional arrangements related to Article 495d of the CRR3 on the total REA will be considered separately within the CSV\_CAP template.

49. 'Equity' and 'other non-credit obligation assets' which are not treated under the Standardised approach should be reported in the rows of 'A-IRB' for the "Actual" starting point information. In line with paragraph 161 of the Methodological Note, banks that have been granted permission to use the IRB approach for the calculation of REA for equity exposures up to 31 December 2024 should continue to report these exposures under the IRB approach for the purpose of the "Restated" starting points and the stress test projections following the application of CRR3 on 1 January 2025. According to paragraph 168 of the Methodological Note, transitional arrangements for equity exposures, related to articles 495 and 495a of the CRR3 as well as the transitional adjustments related to articles 495b, 495c of the CRR3 should be considered for the projections of REA. However, banks should report the impact of the included transitional arrangements as an "of-which" item to the total U-REA in the CSV\_CAP template.

50. For the asset class STA "Secured by mortgages on immovable property and ADC exposures Residential immovable property and Commercial immovable property" (pivot rows), banks are requested to report more granular information under a set of "of which" rows for the "Restated" starting points and projections. The sum of the exposures and risk exposures amounts, respectively, of all "of which" rows may not reconcile with the values on the corresponding pivot line. However, it is expected that the sum of the "of which" rows for "Non IPRE (Secured)", "Non IPRE (Unsecured)" and "IPRE" reconciles with the values reported under the respective pivot rows. Similarly, for the asset class (pivot line) "Secured by mortgages on immovable property and ADC exposures Other" the sum of the "of which" rows "Non IPRE" and "IPRE" reconciles with the values reported under the respective pivot row.

51. The 'stock of credit risk adjustments' fields shall be populated by banks for "Actual" end-2024 in line with COREP, and the "Restated" end-2024 that reflects the application of the CRR3 on 1 January 2025. For the projections, the total stock of credit risk adjustments is linked to the variation of the stock of provisions from the CSV\_CR\_SCEN template but banks shall populate the stock of credit risk adjustments for defaulted assets (i.e. for assets in default according to the CRR3 applicable on 1 January 2025).<sup>17</sup> The projected credit risk adjustments on non-defaulted assets are calculated in the template as the difference between total credit risk adjustments and credit risk adjustments on defaulted assets.

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<sup>17</sup> From the projected provisions on S3 exposures, banks are expected to provide in this field only those that are related to exposures defaulted according to the CRR.

52. The respective exposure values and REAs are linked via formula from this template to the CSV\_CR\_REA\_IRB and CSV\_CR\_REA\_STA templates.
53. For exposures Banks should allocate and report the exposures to “Corporates - Specialised Lending” according to COREP as of 31 December 2024 for the “Actual” and according to applicable CRR3 definitions for the “Restated” 2024 and the projections.. If the bank applies the slotting criteria according to Article 153(5) of the CRR for the calculation of the capital requirements for specialised lending, the risk parameters (PDreg, LGDreg (default stock), LGDreg (non-defaulted assets) and ELBE) for the aggregated specialised lending should reflect the risk parameters of specialised lending excluding specialised lending under the slotting approach. All other fields have to be populated for specialised lending exposures reflecting the amounts for both specialised lending exposures excl. under the slotting approach and specialised lending under the slotting approach.
54. ‘PD Reg – non-defaulted assets’ and ‘LGD Reg – non-defaulted assets’ are aggregated in ‘sum’ asset classes as an average of ‘pivot’ asset classes weighted by non-defaulted exposures.
55. ‘LGD Reg – defaulted assets’ and ‘ELBE – default stock’ are aggregated in ‘sum’ asset classes as an average of ‘pivot’ asset classes weighted by defaulted exposures.

### 2.2.5 CSV\_CR\_REA\_OF

56. The scope of the template covers only exposures which are under the IRB approach treatment as reported in CSV\_CR\_REA, at country level “Total”. For these exposures, banks are requested to report in the CSV\_CR\_REA\_OF template, the equivalent exposure and REA values recalculated under the STA approach. The standardised REA amounts for the IRB exposures will serve as an input for the calculation of the standardised total REA (S-TREA) of the entity.
57. The template covers credit risk information on exposure values, risk exposure amounts application of CRR3), regulatory approach and asset class (rows). The recalculated amounts under the STA approach should be reported both i) using a STA asset classes breakdown and ii) using the original IRB asset classes breakdown. Thus, the totals for exposures and REA across all STA asset classes should fully reconcile with the totals across all the IRB asset classes. For the avoidance of doubt, only exposures reported under the IRB approach in CSV\_CR\_REA are to be reported in the CSV\_CR\_REA\_OF template. The respective REA values are linked via formula from this template to the CSV\_CR\_REA\_IRB template.
58. The same calculation logic and methodological constraints should be applied for the recalculation of IRB exposures under the STA approach as was the case for the exposures originally classified under STA. Thus, banks should simulate the impact of the application of the macroeconomic scenario on the exposures originally classified under the IRB approach, as if they were treated under the STA approach.

59.No transitional adjustments according to Articles 465 and 495d of the CRR3 should be considered for the reporting of standardised credit risk REA at the starting point nor for the projections within the CSV\_CR\_REA\_OF template.

### 2.2.6 CSV\_CR\_REA\_IRB

60.This template contains risk exposure amounts per asset class and expected loss amounts for IRB exposures (expected loss separately for equity exposures and non-equity exposures). Fields are in general automatically populated out of data from CSV\_CR\_REA, except the REA for Equity and Other non-credit obligation assets, the additional value adjustments from Article 159 CRR in the starting point and the expected loss amount for Equity deducted to CET1 according to Article 36(d) CRR. Row ‘Standardised REA for IRB approach portfolios (fully loaded)’ is automatically populated from the CSV\_CR\_REA\_OF template.

61.The rows show the breakdown of IRB REA by asset classes and total IRB expected loss, credit risk and additional value adjustments. The columns show the scenario and year split up into performing and non-performing exposure figures. Additional rows are included to consider the restatement of starting point exposures and projections in accordance with the updated exposure classes for the application of CRR3.

62.The expected loss amount for equity exposures should be reported in the ‘Memorandum item: Expected loss amount Equity deducted to CET1 according to Article 36(d) CRR’ only if the expected loss for equity exposures is included in the IRB shortfall calculation for COREP purposes.

63.The CSV\_CR\_REA\_IRB template ensures that the REA floor (year-end 2024 REA) is applied for IRB exposures considering the “Restated” end-2024 REA. According to the Methodological Note, the floor implemented in CSV\_CR\_REA\_IRB is based on REA without the application of the IFRS 9 transitional adjustments and arrangements related to Article 495d of the CRR3. The total IRB REA values after application of the floor are linked via formula from this template to the CSV\_REA\_SUM template in the calculation of total credit risk REA. In case regulatory risk-weight floors pursuant Article 458 of the CRR are in force, any floor that is in force as of 31 December 2024 must be assumed to remain in place for the whole projection horizon regardless of its expiration date. If regulatory risk-weight floors pursuant Article 458 in force on 31 December 2024 are modified for the application of CRR3 and the modification enters into force on 1 January 2025, the modified risk-weight floors pursuant Article 458 should be considered. The positive difference between such IRB REA floors and the projected IRB REA after the imposition of the stress test REA floor as per paragraph 162 of the Methodological Note (reported in CSV\_CR\_REA\_IRB, “Total Risk Exposure Amount IRB exposures after floor”) shall be reported as “other REA” in the CSV\_REA\_SUM template.



### 2.2.7 CSV\_CR\_REA\_STA

64. This template contains risk exposure amounts under the STA (excluding securitisations). Fields are in general automatically populated out of data from CSV\_CR\_REA banks, except the REA for Equity and Others exposures.
65. The rows show the breakdown of STA REA by asset classes and total STA credit risk adjustments. The columns show the scenario and year split up into non-defaulted and defaulted exposure figures. Additional rows are included to consider the restatement of starting point exposures and projections in accordance with the updated exposure classes for the entry into force of CRR3.
66. The risk weighting when deducting software assets according to the RTS on the prudential treatment of software assets under Article 36 of Regulation (EU) No 575/2013 should be reported in the row “Other exposures”.
67. This template also ensures that the REA floor (year-end 2024 restated REA) is applied for STA exposures. The total STA REA after application of the floor is then linked via formula from this template to the CSV\_REA\_SUM template in the calculation of total credit risk REA. According to the Methodological Note, the floor implemented in CSV\_CR\_REA\_STA is based on REA “Restated” end-2024 without the application of the IFRS 9 transitional adjustments and arrangements related to Article 495d of the CRR3.

### 2.2.8 CSV\_CR\_COVID19

68. In this template, banks are required to provide information regarding exposures subject to COVID-19 public guarantee schemes (PGS). This information includes exposure values, stocks of provisions, REA and credit risk parameters by year, scenario, regulatory approach and main asset classes affected by COVID-19 PGS. The scope of reporting is defined in paragraph 118 of the Methodological note.
69. Banks shall select the countries in scope of the CSV\_CR\_COVID19 template as per paragraph 119 of the Methodological Note via the drop-down menu of the dedicated column in the Input sheet. These countries will be automatically populated in sheet CSV\_CR\_COVID19.
70. The definitions of variables included in this template should follow the EBA Guidelines on COVID-19 measures reporting and disclosure (EBA/GL/2020/07).
71. Columns 1 to 24 refer to the exposures subject to public guarantee schemes according to the EBA/GL/2020/07 that are within the scope of CSV\_CR\_SCEN, except for columns 11 and 12

which should consider the ones within the scope of CSV\_CR\_REA.<sup>18</sup> Exposures subject to public guarantee schemes as per the EBA/GL/2020/07 that are treated under the securitisation framework and reported in CSV\_CR\_SEC should also be reported in the CSV\_CR\_COVID-19 template.<sup>19</sup> At the starting points, banks shall report exposures, provisions, and parameters restated in line with applicable regulation as at 1 January 2025 (CRR3).

72. In contrast to the reporting requirements for the other credit risk templates, in this template the exposures should be reported in asset classes before CRM substitution effects (i.e. the exposures should not be transferred to the asset class of the guarantor). This applies to both the P&L and REA perspectives of the template (i.e. exposure by stage and exposure value). The stocks of provisions and risk parameters should be consistent with the amounts and parameters reported in CSV\_CR\_SCEN and the amounts of REA should be consistent with the amounts reported in CSV\_CR\_REA, but all should be allocated proportionally in line with the breakdown of exposures<sup>20</sup> by asset class before CRM substitution effects.
73. The rows of “Total” should cover all exposures subject to COVID-19 PGS, including the remaining exposures that are not allocated to the main asset classes with open fields in this template (i.e. not Corporates, Retail or non-SME Secured by mortgages on immovable property). For this reason, also the rows of “Total” are open fields to be reported by banks.
74. Should the exposures reported in the explicitly three reported countries not exhaust the entirety of exposures subject to COVID-19 PGS, then the “other” geography rows should be filled out to ensure that the values reported for the “Total” geography represent all exposures covered by the COVID-19 PGS.
75. The information regarding public guarantees covers loans and advances that, at the reference date, are subject to PGS that Member States introduced in response to the COVID-19 crisis.<sup>21</sup> The EBA published a list of PGS issued, which can be accessed via the EBA website.<sup>22</sup> Nonetheless, for the avoidance of doubt, the CSV\_COVID19 template covers all exposures subject to COVID-19 PGS.
76. The field of “Total exposure reported under CRM substitution in Central Governments” should include the total exposures under COVID-19 PGS that were subject to CRM substitution effects

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<sup>18</sup> Columns 11 and 12 should consider both defaulted and non-defaulted exposures.

<sup>19</sup> In line with paragraph 117 of the Methodological Note, the explanatory note should include information on the exposures reported in the template CSV\_CR\_COVID19 that are treated under the securitisation framework. The explanatory note should also include information regarding the risk parameters of securitised and non-securitised loans.

<sup>20</sup> The stocks of provisions and risk parameters should be allocated in line with the exposure by stage, whereas REA should be allocated in line with the exposure value.

<sup>21</sup> Including called public guarantees for which payment was not yet received from the guarantor.

<sup>22</sup> <https://www.eba.europa.eu/eba-publishes-overview-public-guarantee-schemes-issued-response-covid-19-pandemic>

and are reported in the template CR\_CSV\_SCEN in the rows of ‘Central Governments’. Given the different perimeter (listed PGS for columns 2, 4, 6; CRM substitution for column 7), the sum of exposures in columns 2, 4 and 6 must be at least as large as the exposures reported in column 7.

77. The credit risk parameters should be the ones related to the sub-portfolios of exposures subject to COVID-19 PGS. These parameters should be consistent with the parameters reported in the template CSV\_CR\_SCEN but allocated proportionally in line with the breakdown of exposures by asset class before CRM substitution effects.
78. The parameters for loans and advances with public guarantees that cover loans which were also subject to EBA compliant COVID-19 moratoria should disregard the historical influence of moratoria.
79. For the starting point, the LGD parameters for exposures under COVID-19 PGS should be related only to the non-guaranteed part of the exposure (columns 22-24) while the remaining parameters should refer to the entire exposure (i.e. guaranteed and non-guaranteed). For the projections horizon, only the parameters that refer to the entire exposure should be reported.

### **2.2.9 CSV\_CR\_SEC\_SUM**

80. This template shows exposure values and REA for securitisation positions broken down by the regulatory approaches from (SEC-IRBA, SEC-SA, SEC-ERBA and SEC-IAA). This information is automatically populated from CSV\_CR\_SEC, except for the starting point.
81. The rows show the breakdown of REA and exposures by regulatory approach and total aggregated impairments. The columns show the scenario and the year.
82. In this template, only impairments for securitisation positions that are not subject to mark-to-market valuation are reported (i.e. excludes FVOCI and FVPL). This information is sourced from CSV\_CR\_SEC.
83. Banks should populate the columns ‘actual’ and ‘restated’ with the total exposure value, REA, reduction of REA due to the application of regulatory caps and REA on trading book positions subject to specific risk, in line with the regulation applicable as of 31 December 2024 and 1 January 2025, respectively. The projected values for the exposures subject to specific risk, should be stressed in line with section 2.7 of the Methodological Note.
84. The columns ‘actual’ and ‘restated’ should be populated with the REA, as of 31 December 2024, allocated to the regulatory approaches from CRR and reported without any mapping effect from the application of paragraph 184 of the Methodological Note. The ‘total’ REA from CSV\_CR\_SEC\_SUM might therefore be different from the ‘total’ REA reported in CSV\_CR\_SEC

as the latter shows the sum of REA by credit quality step after mapping to the SEC-ERBA look-up table from Articles 263(3) and 264(4) of CRR (i.e. includes the mapping effect).

85. The rows “Risk exposure amounts Article 92(5)(a)(iii) (relevant for output floor and after REA floor)” serve for the purpose of standardised REA calculation for the securitization exposures. The scope of this block covers exposures which are reported under the SEC-IRBA and SEC-IAA approach treatment in CSV\_CR\_SEC. For these exposures, banks are requested to report the equivalent restated REA values assuming the same CQS allocation at the starting point and without considering transitional arrangements in accordance with the paragraph 13 of Article 465 of CRR3. The total standardised REA amount is collected in the row “Total” and will serve as an input for the calculation of the S-TREA of the entity.

86. While in general the definitions of the Methodological Note apply, definitions to be highlighted for the use of this template comprise:

- The definition of exposure which is referred to in section 2.7 of the Methodological Note (in line with Article 248 of CRR);
- Impairments for the use of this template exclude impairments for securitisation positions subject to mark-to-market valuation;
- Whenever a term is not defined specifically in the Methodological Note, the definitions of CRR apply.

87. Securitisation positions covered by Article 254(7) of CRR (“Other” securitisations with a RW of 1250% and not included in COREP in the four main regulatory approaches - SEC-IRB, SEC-SA, SEC-ERBA and SEC-IAA), shall be reported in the SEC-SA rows of this template.

88. The total securitisation impairments are linked via formula from this template to the CSV\_P&L template.

89. The annual relative increase of the REA reported in the CSV\_CR\_SEC template is considered for the projection of REAs by regulatory approach.

90. The CSV\_CR\_SEC\_SUM template applies the REA floors to total securitisation REAs separately for each regulatory approach. CSV\_REA\_SUM then sources the total floored securitisation REAs from the CSV\_CR\_SEC\_SUM template.

91. Exposure values, REAs and impairments are linked via formula from this template to the TRA\_CR\_SEC template.

92. In the case of synthetic securitisation positions as defined in Article 2(10) of CRR, the treatment of maturity mismatch provided by Articles 252(a) and 252(b) of CRR should be considered in the template CSV\_CR\_SEC\_SUM in the row “Additional risk exposure amounts”.

### **2.2.10 CSV\_CR\_SEC**

93. This template contains exposure values and REA for securitisation positions in SEC-IRB, SEC-SA, SEC-ERBA and SEC-IAA. In this template, banks are required to provide exposure values and cumulative credit risk adjustments for securitisations. The template will calculate REAs on an automated basis.

94. The rows show the combinations of scenario, year, regulatory approach and credit quality step. The columns show the exposures, credit risk adjustments, REA and risk weights broken down by risk bucket, STS classification, tranche seniority and maturity.

95. Exposure values and adjustments should be reported in the template differentiated by regulatory approach, credit quality step, risk bucket, STS classification, tranche seniority and maturity. The amount of exposures that are not subject to mark-to-market valuation should be reported separately in the dedicated “of-which” column of the template.

96. The column “Memo item: Exposure value (pre-floor)” serves for the purpose of collecting pre-regulatory-floor risk weight data of securitization positions at the starting point. The total securitization exposures shall be reallocated to credit quality steps corresponding to the risk weights before the application of the regulatory floors.

97. While in general the definitions of the Methodological Note apply, a specific definition to be highlighted for the use of this template is the definition of exposure which is referred to in section 2.7 of the Methodological Note (in line with Article 248 of CRR. Moreover, whenever a term is not defined specifically in the Methodological Note, the definitions of CRR apply.

98. The columns of exposure values are to be reported net of cumulative specific credit risk adjustments and in accordance with Article 248(1) of CRR.

99. The allocation of different securitisation positions to the risk buckets identified in paragraph 189 of the Methodological Note should consider, as a reference, the structured finance asset classes reported in the ESMA central repository (CEREP). Some examples of these asset classes are provided in the Committee of European Securities Regulators’ (CESR) Guidelines for the implementation of the CEREP. In particular, the following should be considered: (i) Asset-backed securities (ABS) are securities backed by non-mortgage financial assets including auto/boat/airplane loans, student loans, consumer loans, health care loans, manufactured housing loans, film loans, utility loans, equipment leases, credit card receivables, tax liens, non-performing loans, credit linked notes, recreational vehicle loans and trade receivables; (ii)

Residential mortgage backed securities (RMBS) includes Prime and non-Prime RMBS, and Home equity loans (HEL); (iii) Commercial mortgage backed securities (CMBS) includes asset types such as retail or office property loans, hospital loans, care residences, storage facilities, hotel loans, nursing facilities, industrial loans and multifamily properties; and (iv) Collateralised Debt Obligations (CDO) are securities backed by a portfolio of bonds and/or loans, including Collateralised Loan Obligations, Collateralised Bond Obligations, Collateralised Synthetic Obligations, single-tranche CDO and Collateralised Fund Obligations. The definition of asset-backed commercial paper (ABCP) should be in line with Article 2 (7) and (8) of Regulation (EU) 2017/2402. Re-securitisations of any of the above instruments should be allocated only to risk bucket 3. Synthetic securitisations, incl. arbitrage synthetic securitisations, qualify as "other positions" and thus should be allocated to Risk Bucket 3. On-balance sheet synthetic securitisations, however, may be allocated to other risk buckets according to equivalent traditional securitisations as long as the underlying risk is equivalent. In this case, banks should provide in the explanatory note supporting evidence for the equivalence in risk and the related allocation to another Risk Bucket. The country of issue of the instrument should be the domicile of the underlying assets and, according to paragraph 183 of the Methodological Note, mixed pools should be allocated to the bucket that covers the highest share of total REA within the tranche.

100. Securitisation positions covered by Article 254(7) of CRR ("Other" securitisations with a RW of 1250% and not included in COREP in the four main regulatory approaches - SEC-IRB, SEC-SA, SEC-ERBA and SEC-IAA), shall be reported in the SEC-SA rows of this template.
101. Senior securitisation positions in the qualifying traditional NPE securitisation positions treated according to paragraph 3 of Article 269a of CRR shall be reported in the dedicated rows of this template.
102. REA projections are automatically calculated in this template by applying prescribed stressed risk weights to the projected exposure values.
103. Exposure values, REA projections and credit risk adjustments are linked via formula from this template to the CSV\_CR\_SEC\_SUM template.

#### **2.2.11 CSV\_CR\_NPL**

104. This template contains end-of-year exposure values, both for total non-performing exposures and those of which were originated or modified after 26 April 2019 as per Article 469a of CRR, as well as components of the actual loss coverage, minimum loss coverage requirements and amounts of insufficient coverage related to non-performing exposures in the scope of Art. 47c of CRR as regards minimum loss coverage.

105. Since the calendar provisioning is a prudential measure, the scope of this template should be aligned with the template CSV\_CR\_REA.
106. The rows show the exposure values, the total minimum coverage requirements, the available coverage and the applicable amount of insufficient coverage, respectively for the unsecured part of NPE and those parts of NPE that are either secured by immovable property or by other funded or unfunded credit protection or guaranteed or counter-guaranteed by an eligible protection provider, reflecting the application of the CRR3 as of 1 January 2025.
107. The exposure value of a debt instrument shall be its accounting value measured without taking into account any specific credit risk adjustments, additional value adjustments, amounts deducted, other own funds reductions related to the exposure or partial write-offs made by the institution since the last time the exposure was classified as non-performing. The exposure value of a debt instrument that was purchased at a price lower than the amount owed by the debtor shall include the difference between the purchase price and the amount owed by the debtor.
108. The exposure value of a loan commitment given, a financial guarantee given, or any other commitment shall be its nominal value, which shall represent the institution's maximum exposure to credit risk without taking account of any funded or unfunded credit protection. In particular, the nominal value of financial guarantees given shall be the maximum amount the entity could have to pay if the guarantee is called on and the nominal value of loan commitments shall be the undrawn amount that the institution has committed to lend. Regulatory haircuts shall apply pursuant to Title II of Part Three of the CRR.
109. As per paragraph 565 of the Methodological Note, no forbearance measures shall be assumed during the stress test horizon. Banks shall consider forbearance measures in the starting points as per COREP 35.03. Exposures subject to forbearance measures should be reported according to the timing when the first measures were applied after the classification of the exposure as non-performing.
110. The amounts of available insufficient coverage shall correspond to the total provisions and adjustments or deductions at individual exposure level. In the template, banks shall provide the (uncapped) amount of available coverage by i) specific credit risk adjustments, ii) additional valuation adjustments, iii) other own funds reductions, iv) IRB shortfall, v) difference between the purchase price and the amount owed by the debtor, and vi) amounts written-off by the institution since the exposure was classified as non-performing. It is assumed that no write-offs should take place within the three-year horizon of the exercise, only amounts written-off by the institutions prior to the start of the exercise should be reported. Additionally, banks shall provide the total amount of available coverage capped by the minimum coverage requirements at exposure level, based on which the applicable amount of

insufficient coverage is determined as the positive difference between the minimum coverage requirements and the capped amounts of available coverage. The capped amount shall be calculated separately for each exposure as the lower amount between the minimum coverage requirement for this exposure and the total provisions and adjustments or deductions for the same exposure. The total applicable amounts of insufficient coverage are linked via formula from this template to the CSV\_CAP template.

111. The columns provide further breakdowns based on the time passed since the exposures in scope of the NPL calendar were classified as non-performing, both for the starting point and the years over the projection horizon, as per Article 47c of CRR.



## 2.3 Market Risk, CCR losses and valuation

### 2.3.1 CSV\_MR\_SUM

113. This template shows the impact of the adverse scenario on market risk positions according to chapter 3 of the Methodological Note (i.e. full balance sheet revaluation, stress impact on valuation reserves, CCR losses and NTI projections), with almost all of the data sourced from the CSV\_MR\_FULL\_REVAL, CSV\_MR\_OPT\_REVAL, CSV\_MR\_RESERVE, CSV\_MR\_CCR and CSV\_MR\_PROJ templates.
114. The rows cover the different items subject to the adverse scenario stress (e.g. balance sheet full revaluation, reserves, counterparty credit risk loss, NTI projections). The columns cover the years and a breakdown of 2025 figures by accounting treatment.
115. Apart from the memorandum items on defined pension plans (application of market risk stress on these items covered in section 6.4.6 of the Methodological Note) and discontinued operations (paragraph 208 of the Methodological Note), the following items should be directly populated by banks:
- The maximum FRTB-ASA REA for SBA & RRAO (as reported in COREP 91 from row 0020 to 0080 and from 0120 to 0130, column 190) of the last four quarters. ,
  - ‘VaR<sup>23</sup> as of end of year 2024’.
  - ‘75th percentile of daily VaR in 2024’ should be populated by the participating banks for 2024. If the 75th percentile of the 2024 VaR figures is not a single data point, the 75th percentile value should be obtained by taking the average between the two adjacent data points.
116. The reported daily VaR figures listed above shall be calculated based on all positions in the scope of the regulatory trading book using the regulatory VaR model. In case a regulatory VaR model is not available or covers only parts of the items in the regulatory trading book, internal models shall be used, to the extent possible, for the remainder of the regulatory trading book. In the explanatory note, banks should report parts of the regulatory trading book covered neither by regulatory nor by internal models. Regulatory VaRs shall be reported without using regulatory multiplication factors.
117. The drop-down menu in RowNum 1 of this template allows the specification of the approach followed. The differentiation of the three approaches, ‘comprehensive approach advanced’ (CA-adv), ‘comprehensive approach’ (CA) and ‘trading exemption’ (TE), for the

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<sup>23</sup> Considering a 10-day holding period.

purpose of this template is covered under section 3.3.1 of the Methodological Note. The definition of the scaling factor for the CA can be found in paragraph XX of the Methodological Note.

118. Balance sheet full revaluation projections are sourced from the CSV\_MR\_FULL\_REVAL template, the stress impact on valuation reserves from CSV\_MR\_RESERVE, projected counterparty credit risk losses from CSV\_MR\_CCR, and NTI projections from CSV\_MR\_PROJ.
119. Depending on the accounting treatment, the adverse scenario stress projections are linked via formula from this template to the CSV\_P&L template, except for the projections of NTI which are linked via formula to the CSV\_MR\_PROJ template, and the FVOCI impact projections which are linked to the CSV\_CAP template.

### **2.3.2 CSV\_MR\_FULL\_REVAL**

120. The template contains the inputs and results for the full revaluation of positions under partial or full fair value measurement that should be subject to the market risk scenario as defined under section 3.4 of the Methodological Note. In the template, banks are requested to provide the following information as of the reference date:
- a. notional values of their positions, broken down by hedged items and hedging instruments
  - b. fair values of their positions, broken down by hedged items and hedging instruments
  - c. Granular first order sensitivities ('delta') of the positions to interest rate, FX, equity, commodity, and inflation risk (only CA and CA-adv banks)
  - d. Granular second order sensitivities ('gamma' and 'vega') of the positions to interest rate, FX, equity, commodity, and inflation risk (only CA and CA-adv banks)
121. Banks should project in the adverse scenario in 2025 the following information:
- a. the overall gains & losses of the adverse scenario on P&L and OCI, broken down in columns by hedged items and hedging instruments.
  - b. Breakdown of the sensitivities by risk factor (all banks, including TE banks)
122. To perform the full revaluation, banks should comply with the following procedure:

**Box 1 Steps to perform the FULL REVALUATION matching items with hedges**

A. Re-organise items and related hedges according to the row structure of the CSV\_MR\_FULL\_REVAL template

- a. Hedges accounted as FVPL (HfT) but related to items NOT in FVPL (HfT) should be considered in the rows of the items they refer to and reported in the appropriate columns (ColNums 3 to 5, 14 to 16, 26 to 28, 37 to 39), and excluded from the rows of FVPL (HfT) (RowNums 81 to 106). The re-allocation of FVPL (HfT) hedges should be such that no double counting occurs between these columns and rows.

Example:

		Portfolios to be considered by row broken down in the appropriate columns	
		Items	Hedges
Item: Amortised cost	i1	i1	h1
Item: FVOCI	i2	i2	h2
Total: FVPL (HfT)	H	H – (h1+h2+hn)	hn
• (Of which: FVPL (HfT) hedges related to Item 1 and 2)	h1, h2		
• (Of which: FVPL (HfT) hedges related to FVPL (HfT) positions)	hn		

- b. **Micro-hedges** should be considered in the rows related to the items they refer to.
- c. **Hedges related to more than one item and portfolios of hedges** should be considered and matched with those items they refer to according to i) the existence of an hedge-accounting relation under either IFRS 9 or IAS 39, and ii) the operational rationale of the hedges. Under the operational rationale of the hedges, banks are free to reallocate hedges in different rows following the criteria that best lead to a correct and realistic representation of the hedge adjustments.
- B. Perform the full revaluation according to the market risk scenario.
- C. Report notional amounts, FV, gains and losses, and sensitivities in the CSV\_MR\_FULL\_REVAL template. Notice that notional amounts, FV, and gains and losses should be reported broken down in columns by hedged items and hedging instrument. Sensitivities should be reported in separate rows for items and hedges.

- a. For the columns other than notional amount relative to hedges, amounts are to be reported by row net of asset and liabilities and net of long and short positions, i.e. the reported amount must be a correct, realistic, and consistently re-allocated image of the hedge amount/adjustment, which summed up to the values contained in the items columns, results in a correct and realistic FV and gains and losses by row.

123. The **rows of the template** show combinations of balance sheet position, IFRS 9 measurement type, type of instrument and related hedges, and type of counterparty. A detailed description of the row structure is provided in Table 9 of Annex I.
124. In the rows referring to FVPL (HfT) items (RowNum 81 to 106), banks should report only those items and related hedges that are entirely managed within the trading book. If hedges in the trading book relate to items not accounted in the trading book, the notional amount, FV, and gains and losses of such hedges should be reported in the rows relative to the items they refer to (and they should not be reported RowNums 81 to 106). The columns related to hedging instruments (ColNum 3 to 5, 14 to 16, 26 to 18) are expected to sum to the total amount of hedges reported by the bank and no double counting should occur between these columns and the rows related to FVPL HfT (RowNum 81 to 106).
125. Sensitivities should be reported by combinations of balance sheet position, IFRS 9 measurement type, and type of instrument. Sensitivities should be broken down between the part of the sensitivities corresponding to hedged items and that of hedging instruments. Sensitivities must also be reported separately for FVOCI Debt Instruments to General Governments.
126. For items held with a trading intent and their related hedges (from RowNum 81 to 106), the net between long and short positions must be reported. Depending on the instruments, long and short positions should be identified as follows:
- For linear instruments (equities, bonds, etc.) a long position refers to a position where an investor benefits from a rise in the price of the security. The opposite applies for short positions.
  - For interest rates futures and forwards, a 'short position' means a position in which an institution has fixed the interest rate it will pay at some time in the future while a 'long position' means a position in which an institution has fixed the interest rate it will receive at some time in the future (in line with art. 328 point 2 of the CRR)

- For plain vanilla swaps the criteria should be based on the fair value impact (positive or negative) coming from a change in the interest rates. In this regard, a fixed receiver swap instrument, where the fair value of the swap increases after a reduction in the interest rates, should be reported as a long position. On the other hand, a fixed payer swap instrument, where the fair value of the swap decreases after a reduction in the interest rates, should be reported as a short position. For reporting purposes swaps and derivatives should not be split in two legs. The notional, should be reported in full in the same row (either under long or short, depending on how it is classified) and should not be split in two halves. For basis swaps in the same currency and referring to the same index but with different maturities (i.e. swap 3m vs 6m Libor) the longer maturity leg have to be considered. The swap will be reported as “long” if the longer leg is received, or “short” if it is paid. For basis swaps with the two legs of the same tenor but referencing to two different indexes, banks are free to choose whether to consider the sensitivities as “long” or “short”.
- The criteria for the interest rates futures and forwards also apply to Credit Default swap (CDS). This means that if an increase in the credit spread would lead to a gain in the position, the CDS position should be reported as a "short position", and the corresponding sensitivity should be reported with a positive sign. Conversely, if an increase in the credit spread would lead to a loss for the CDS position, it should be reported as a "long position" and the corresponding sensitivity should be reported with a negative sign.
- For securities or cash denominated in a foreign currency (e.g.: forex forwards and futures), in case a depreciation of the foreign currency versus Euro would lead to a gain for the position, the corresponding FX sensitivity should be reported as "long position" with positive sign. If otherwise a depreciation of the foreign currency versus Euro would lead to a loss for the position, the corresponding FX sensitivity should be reported as "short position" with negative sign. In case of an appreciation of the foreign currency versus Euro the rules apply with opposite directions and signs.
- Cross currency swaps (XCC) with one leg denominated in Euro, should be reported as “long” if the fixed leg is received in EURO, while they should be reported as “short” if the fixed leg is paid in EURO. In case of XCC with the two legs referencing to two currencies different from EURO, banks are free to choose the row where to report the sensitivities of the two legs between “long” and “short”. The notional, should be reported in full in the same row (either under long or short, depending on how it is classified) and should not be split in two halves.

127. The **columns of the template** show the notional exposures, fair values, projected adverse scenario gains/losses from full revaluation, and the first and second order sensitivities to different risk factors.
128. Notional amount: for all RowNum of the CSV\_MR\_FULL\_REVAL template, the notional amount is defined as the sum of the absolute values for assets (positive) and liabilities (positive).
129. Fair value: for 'Assets' (from RowNum 1 to 16 and from 33 to 57) and for 'Liabilities' (from RowNum 17 to 32) the fair value should be reported as a positive value. For 'Net assets and Liabilities' (from RowNum 58 to 106) the fair value is the signed net amount, meaning the difference between assets (taken as positive) and liabilities (taken as negative).
130. For fair value hedging, hedged items assets at amortised cost are in scope for the full revaluation only if the hedged risk is not FX, and the impact shall be reported under the line 'Amortised cost/FVPL', in the column 'Gains or losses from full revaluation'. The impact from the revaluation should be split between OCI impact for the hedged risk and P&L impact for hedging ineffectiveness. Table 9 of Annex I shows how to report the impact for each accounting category.
131. Considering the column dimension, the template is ideally divided into three sections:
- Breakdowns of notional amount, FV, and gain and losses from ColNum 1 to 43
  - Breakdown by risk factors of the sensitivities of the projected gain and losses from ColNum 44 to 67
  - Granular breakdown of the sensitivities as of the reference date (31 December 2024) from ColNum 70 to 533 (Only for CA and CA-adv banks)
132. The total notional amount, fair value, and gains & losses from full revaluation (sum of P&L and OCI) should, in addition to the breakdown by items and hedges, also be broken down in columns by:
- L1-2-3 classification, where L2 can be either cleared or others. Banks should that classify level 1-2-3 assets following the accounting definition provided in IFRS 9.
  - The amount of fund positions.
  - The amount of back-to-back trades.
133. The details of the inputs to be provided by columns are:

- a. Notional amount (ColNum 1 to 11): It is the notional amount of the sum of the positions concerning each row as of 31 December 2024. Regarding the notional of amortised cost items being part of a hedge-accounting relationship, which are in scope for the full revaluation only for the hedged risk, the notional of the hedged item should be reported only for the hedged risk. The following details of the total notional amount should be provided:
- i. 'Breakdown of Total by hedged items and hedging instruments (of column 1)': 'of which: items (both hedged or not)' (ColNum 2) and 'of which: hedging instruments', where 'of which: hedging instruments' is to be distinguished between fair value hedges (ColNum 3), cash flow hedges (ColNum 4), and economic hedges (ColNum 5)
  - ii. 'Breakdown of Total by L1-2-3 (of column 1)' (ColNum 6 to 9)
  - iii. 'Additional breakdowns' (cols 10-11): 'of which (of column 1): fund position' (ColNum 10), indicating the amount of the exposure related to funds, and 'of which (of column 1): back-to-back trades' (ColNum 11), indicating the amount of the exposure being back-to-back trades (back-to-back trades defined in the Methodological Note)
- b. Fair Values (ColNum 12 to 22): Fair Value of positions to be reported as of 31 December 2024. The Fair Value should be in line with FINREP reporting, also for what concerns the criteria for reporting dirty or clean prices. The following details of the total fair value should be provided:
- i. 'Breakdown of Total by hedged items and hedging instruments (of column 12)': 'of which: items (both hedged or not)' (ColNum 13) and 'of which: hedging instruments', where 'of which: hedging instruments' is to be distinguished between fair value hedges (ColNum 14), cash flow hedges (ColNum 15), and economic hedges (ColNum 16)
  - ii. 'Breakdown of Total by L1-L2-L3 (of column 12)' (ColNum 17 to 20)
  - iii. 'Additional breakdowns': 'of which (of column 12): fund position' (ColNum 21), indicating the amount of the exposure related to funds, and 'of which (of column 12): back-to-back trades' (ColNum 22), indicating the amount of the exposure being back-to-back trades (back-to-back trades defined in the Methodological Note)
- c. Gains & losses from full revaluation under the adverse scenario (ColNum 23 to 69): gains and losses after the application of the shocks provided in the market risk scenario. The following details of the total gains & losses from full revaluation should be provided:

- i. The Total impact (ColNum 23) is automatically computed as the sum of “PnL Impact” (ColNum 24) and “OCI impact” (ColNum 35).
- ii. The “PnL Impact” (ColNum 24) should be broken down by:
  - ‘Breakdown of Total by hedged items and hedging instruments (of column 24): ‘of which: items (both hedged or not)’ (ColNum 25) and ‘of which: hedging instruments’, where ‘of which: hedging instruments’ is to be distinguished between fairs value hedges (ColNum 26), cash flow hedges (ColNum 27), and economic hedges (ColNum 28)
  - ‘Breakdown of Total by L1-2-3 (of column 24) ’ (ColNum 29 to 32)
  - ‘Additional breakdowns’ (only for CA and CA-adv banks): ‘of which (of column 24): fund position’ (ColNum 33), indicating the amount of the exposure related to funds, and ‘of which (of column 24): back-to-back trades’ (ColNum 34), indicating the amount of the exposure being back-to-back trades (back-to-back trades defined in the Methodological Note)
- iii. The “OCI Impact” (ColNum 35) should be broken down by:
  - ‘Breakdown of Total by hedged items and hedging instruments (of column 35): ‘of which: items (both hedged or not)’ (ColNum 36) and ‘of which: hedging instruments’, where ‘of which: hedging instruments’ is to be distinguished between fairs value hedges (ColNum 37), cash flow hedges (ColNum 38), and economic hedges (ColNum 39)
  - ‘Breakdown of Total by L1-2-3 (of column 35) ’ (ColNum 40 to 43)
  - ‘Additional breakdowns’ (only for CA and CA-adv banks): ‘of which (of column 35): fund position’ (ColNum 44), indicating the amount of the exposure related to funds, and ‘of which (of column 24): back-to-back trades’ (ColNum 45), indicating the amount of the exposure being back-to-back trades (back-to-back trades defined in the Methodological Note)
- ‘Breakdown by risk factors (of column 23)’ (ColNum 46 to 69) (for all banks, including TE banks): banks should report in these columns the breakdown of the total gains and losses distinguished by risk factor category. For each risk factor a breakdown of the amount relative to delta (as defined in table 8 of the Methodological Note), Gamma, and Vega sensitivity should be reported. The definitions of Gamma and Vega are described below:



- **Gamma** is the change in delta for each unit change in the price of the underlying and, thus, is the 1<sup>st</sup> derivative to the equation for the delta and the 2<sup>nd</sup> derivative to the equation for the underlying price function. For bonds, Gamma is equal to the convexity defined as the rate that the duration changes along the price-yield curve. In line with table 8 of the Methodological Note, the unit change in the underlying for interest rate sensitivities is 1 bps while for equity is 1 percentage point.
- **Vega** is the change in the option value for a 1% relative change in the level of implied volatility. For example, an option may have a value of \$2.45 and a volatility of 50%. In this case a Vega of 0.10 means that if volatility increases to 50.5%, then we should expect the option's value to increase to \$2.55.

134. From ColNum 70 to 513, banks (excluding TE banks) should report delta sensitivities as defined in table 11 of section 3.3.4 of the Methodological Note. Sensitivities related to interest rate risk are broken down by geographical area and tenor. Sensitivities related to FX risk are broken down by currency. Sensitivities related to Equity risk are broken down by geographical area. Sensitivities related to credit spread risk are broken down by type of spread (sovereign, corporate, covered bond, and securitization), geographical area, and credit quality steps as defined in the External Credit Assessment Institution (ECAIs) of the Commission Implementing Regulation (EU) 2016/1799. Sensitivities related to inflation risk are broken down by geographical area and tenor. For each risk factor category, the column 'other' should contain the sensitivity of those risk factors that are not provided in the market risk scenario.

135. Banks should also report Gamma and Vega for more aggregate risk factors (interest rates and equity) from ColNum 512 to 533. Assuming that for a certain risk factor the impact of a shock of 100 bps is equal to 50mln EUR, then Gamma should be reported in the CSV\_MR\_FULL\_REVAL template, from column 502 to 522, according to the following equation:  $50 = 100^2 * \text{Gamma} / 2 \rightarrow \text{Gamma} = 2 * (50 / 100^2)$ .

136. The Vega referring to options with different tenors should be reported in each portfolio row of the CSV\_MR\_FULL\_REVAL template as the sum of the single option Vegas with a specific maturity multiplied by a specific weight. The weight of each single Vega is given by the ratio between the shock applied for the maturity of the option that the Vega is referring to, and a pivot maturity (which are selected among the ones reported in the market risk scenario). In particular, the pivot maturity for FX and Equity should be assumed as equal to 6 months, while for interest rates it is 1Yx1Y. For instance, if the 3M equity volatility shock is equal to 190% and the 6M one is equal to 163%, then the weight for the 3M equity Vega should be  $1.166 = 190\% / 163\%$ . In case the previous computations are not possible because volatilities shocks are not provided for the risk factor under evaluation, banks should provide

information in the explanatory note and use as weights the ones reported in the table below.

1M	3M	6M	1Y	2Y	5Y
1.73	1.00	0.71	0.50	0.35	0.22

The impact from Vega should be calculated as in the following example: if the equity volatility shock in the market risk scenario for the pivot tenor (6 months) is equal to 163% and that the sum of the weighted Vega sensitivities is equal to 150 €, then the impact should be given by  $(150 \text{ €} * 163) = 24,450 \text{ €}$ .

137. If banks use different measurements of implied volatilities for their pricing models (i.e., market standards implied volatility and not lognormal implied volatilities as provided in the market risk scenario), they should all be considered as the same risk factor (as “volatility”). Therefore, banks should convert their internally used implied volatilities into the lognormal implied volatilities (obtained from the Black model) and report the related Vega P&L columns in “Breakdown by risk factors (of column 23)” (ColNums from 46 to 69) of the CSV\_MR\_FULL\_REVAL template. In case of negative implied volatilities, the Vega sensitivities should be computed in a way that would allow to reconcile the Vega P&L impacts with the shocks of the Market Risk scenario according to the following relationship: Vega P&L impact = Volatility shocks \* Vega sensitivity. Banks should report in the explanatory note a brief description on how the volatility shocks in the market risk scenario were applied to their full revaluation model to obtain the P&L impact. They should explain their assessment of the consistency of the Vega sensitivities, as derived by their internal model, with the scenario shocks and the impacts obtained with their pricing model, explaining the model definitions, assumptions, and its calibration.
138. As described in section 3.4.4 of the Methodological Note banks should follow the approach described in Box 14 when determining and shocking risk factors. This includes taking into account key basis risks which may have been underestimated by following the approach in Box 14, e.g. due to (i) mapping of several risk factors to same EBA shock (many-to-one); (ii) statistical similarity of risk factors and other key risk drivers resulting from applied statistical expansion (iii) interpolation and extrapolation methods which may have led to risk factors which are unjustifiably similar on statistical or economic ground. Furthermore, basis risk between relevant risk factors, that are not provided in the market risk scenario, should be also captured when performing the calibration of those risk factors. Finally, banks are required to stress all the risk factors affecting the market value of a security. Moreover, when applicable, banks shall assess if the calculated impact correctly reflects the higher order sensitivities the item is subject to. If banks do not apply Taylor expansion when required, they should assess that the alternatively used methodology is sufficiently conservative. Banks should indicate in

the explanatory note how, for which instruments and for what part of the portfolio they applied this alternative approach.

139. Banks should also report sensitivities in the CSV\_MR\_FULL\_REVAL template. In this regard, a bucketing approach as defined in paragraph 254 of the Methodological Note should be followed. The bucketing is used to report the sensitivities of a portfolio associated to many tenors, on a curve mapped into a simplified portfolio with a reduced number of sensitivities corresponding to the tenors reported in the template. The box below provides instructions to banks for the bucketing approach with an example application.

#### Box 2: The bucketing approach

In the following example, we show how to apply the bucketing approach to report the first order sensitivity at a 7-year tenor in the CSV\_MR\_FULL\_REVAL template. We assume that the template contains only the 5y and the 10y tenors. The characteristics of the sensitivities are reported in the table below:

	5y	7y	10y
<b>Reported sensitivity</b>	24 000	65 000	62 300
<b>Shock (bps)</b>	59	64	67

The reported sensitivity at the 7y tenor should then be split in the two adjacent tenors by computing shock-based weights as explained below:

	5y	7y	10y
<b>Reported sensitivities after bucketing</b>	48 375		102 925

$$5y \text{ weight} = (67 - 64) / (67 - 59)$$

$$10y \text{ weight} = (64 - 59) / (67 - 59)$$

The total impact computed from the tenors' sensitivities after bucketing is consistent with the impact before bucketing:

	5y	7y	10y	Total
<b>Impact without bucketing</b>	142	416	417	975
<b>Impact with bucketing</b>	285		690	975

140. The overall impact of the adverse scenario on P&L and OCI is sourced from the CSV\_MR\_FULL\_REVAL template by the CSV\_MR\_SUM template.

### 2.3.3 CSV\_MR\_OPT\_REVAL

141. Only banks classified as CA-adv shall report the CSV\_MR\_OPT\_REVAL template.

142. If not differently specified, the instructions to follow in reporting the CSV\_MR\_OPT\_REVAL are those applying for the CSV\_MR\_FULL\_REVAL template.

143. The CSV\_MR\_OPT\_REVAL focuses on details of the revaluation of optional derivatives in the trading book.

144. The **rows of the template** show combinations of balance sheet position, IFRS 9 measurement type, and type of instrument and related hedges.

145. The **columns of the template** show the notional exposures, fair values, projected adverse scenario gains/losses from full revaluation, and the first and second order sensitivities to different risk factors.

146. Considering the column dimension, the template is ideally divided into three sections:

- a. Details of notional amount and fair value as of 31 December 2024 from ColNum 1 to 8
- b. Details of the gains and losses from the full revaluation under different scenarios from ColNum 9 to 28
- c. Breakdown by risk factor of the sensitivities under different scenarios from ColNum 29 to 148

147. The notional amount, FV, and gain and losses from revaluation should be broken down by 'of which: items (both hedged and/or not)' and 'of which: hedging instruments'. The amount related to hedging instruments should further be broken down into 'Linear' and 'Optional derivatives'.

148. The **scenarios** of the template are defined as EBA\*-0.2, EBA\*0.2, EBA\*0.4, EBA\*0.6, and EBA\*0.8. In each scenario, the EBA parameters should be scaled by the indicated factor of -0.2, 0.2, 0.4, 0.6, and 0.8.

149. The definitions of delta, gamma, and vega sensitivities follow the definitions and the same instructions provided for CSV\_MR\_FULL\_REVAL in the Methodological Note and in the present Template Guidance.

### 2.3.3 CSV\_MR\_RESERVE

150. This template contains the inputs and results for the revaluation of the valuation reserves (i.e. CVA, FuVA, market risk and liquidity and model uncertainty reserves). In this template banks are requested to provide the actual valuation reserves as of 31 December 2024 as defined in section 3.5 of the Methodological Note. Furthermore, banks are requested to provide the stressed reserves in 2025.

#### (i) CVA reserves

151. Regarding CVA reserves, the template rows show combinations of counterparty type and credit quality range (IG/Sub-IG). Specific definitions to be highlighted for the use of this template comprise:

- The abbreviation IG used in the break-down of the CVA reserves stands for investment grade.
- The abbreviation Sub-IG used in the break-down of the CVA reserves stands for sub / non-investment grade.
- The columns of the template show the accounting reserve, projected adverse scenario reserve from full revaluation, and the delta sensitivities of CVA to different risk factors. Furthermore, the P&L impact of CVA hedges should be provided by banks in this template only as a memorandum item, while any impact out of this should be reported following its accounting requirements in the respective positions in the template CSV\_MR\_FULL\_REVAL.

152. Only hedges that fall into the categories below (as per CRR3 Art. 386) should be considered as “eligible hedges” to offset CVA reserves. The netting will be done directly in the CSV\_MR\_SUM. Eligible hedges should be reported from column 13 of the CSV\_MR\_RESERVE template, after being stressed with the shocks provided in the market risk scenario, and they should not be reported in the CSV\_MR\_FULL\_REVAL template. According to CRR Art. 386 they can be one of the following:

- a. Single-name credit default swaps and single-name contingent-credit default swaps, referencing: (i) the counterparty directly; (ii) an entity legally related to the counterparty, where legally related refers to cases where the reference name and the counterparty are either a parent and its subsidiary or two subsidiaries of a common parent; (iii) an entity that belongs to the same sector and region as the counterparty;
- b. Index credit default swaps, provided that the basis between any individual counterparty spread and the spreads of index credit default swap hedges is reflected, to the

satisfaction of the competent authority, in the value-at-risk and the stressed value-at-risk;

- c. instruments that hedge variability of the counterparty credit spread, with the exception of instruments mentioned in Article 325(5);
- d. instruments that hedge variability of the exposure component of CVA risk, with the exception of the instruments mentioned in Article 325(5).

If those positions meet all of the following requirements:

- e. those positions are used for the purpose of mitigating CVA risk and are managed as such;
- f. those positions can be entered into with third parties or with the institution's trading book as an internal hedge, in which case they shall comply with the requirement set out in Article 106(7);
- g. a given hedging instrument forms a single position in an eligible hedge and cannot be split into more than one position in more than one eligible hedge.

#### **(i) FuVA reserves**

153. Regarding FuVA reserves, the template rows show a breakdown between the items subject to FuVA and related hedging items. The columns of the template show the accounting reserve, projected adverse scenario reserve from full revaluation, and the delta sensitivities of the FuVA to different risk factors. Furthermore, the P&L impact of FuVA hedges should be provided by banks in this template only as a memorandum item, while any impact out of this should be reported following its accounting requirements in the respective positions in the template CSV\_MR\_FULL\_REVAL.

154. Regarding the reporting of sensitivities to CVA reserves, the definitions reported in Table 11 of the Methodological Note apply.

155. Only hedges banks entered in to specifically hedge the FuVA, booked and managed by a dedicated function (e.g. FuVA trading desk) should be considered as "eligible hedges" to offset FuVA reserves. The netting will be done directly in the CSV\_MR\_SUM. Eligible hedges should be reported from columns 14 to 19 of the CSV\_MR\_RESERVE template, after being stressed with the shocks provided in the market risk scenario, and they should not be reported in the CSV\_MR\_FULL\_REVAL template.

#### **(ii) Liquidity and model uncertainty reserves**

156. For liquidity and model uncertainty reserves, combinations between accounting position types and IFRS 13 level balance sheet position are reported. The definition of level 1, level 2 (cleared and not cleared) and level 3 instruments is specified in section 3.3.2 of the Methodological Note..
157. The columns show reserve amounts for the starting point and the first year of the adverse scenario split between accounting and AVA reserves. In line with paragraph 307 of the Methodological Note, accounting reserves should concern market price uncertainty, liquidity (bid-ask) and model risk, while for AVA reserves the adjustments related to market price uncertainty, close out cost, model risk, unearned credit spreads as well as investing and funding cost should be reported. All other AVAs defined in article 105 of the CRR, as well as adjustments for model risk not affected by the market risk adverse scenario, should be included in “memo items – other reserves” in RowNum 39 to 44. Accounting reserves not subject to shocks (e.g. DVA), should not be included in the memo items.
158. The impact (difference between the starting point and the adverse scenario reserve) is computed directly in the template. Banks will have to apply section 3.5.3 of the Methodological Note to report the stressed reserves (see Box 15 of the Methodological Note). Some examples on how to compute the stressed reserves depending on the availability of the bid-ask spread are reported in the box below. The stressed reserve will be the sum of the starting point reserve and the computed impact. The starting point (AVA at Q4 2024) should reflect the 50% aggregation factor as of COMMISSION DELEGATED REGULATION (EU) 2020/866.
159. Banks are free to choose whether to apply the methodology at security level or at portfolio level (using sensitivities), having in mind to produce prudent impact estimations that are always subject to the Quality Assurance process of the supervisor. In this respect, banks are expected to adhere as closely as possible to the methodology employed internally for the calculation of accounting and prudential reserves. Consequently, any divergence from that methodology must be adequately justified and accompanied by the implementation of additional controls on the input used (e.g. sensitivities), aggregation and calculation methodologies. Applying the multiplier directly to amount of reserves is an approximation that does not guarantee to estimate the stressed impact in line with what the methodology prescribes.
160. Banks should follow the guidance reported in Box 15 to apply the Methodological Note. As stated in paragraph 308 of the Methodological Note, banks under the simplified approach according to the EBA RTS on prudent valuation don't need to stress the AVA and can assume it stays flat during the stress scenario.

**Box 3: Application of the liquidity and model uncertainty methodology**

### Deriving the bid-ask spread at instrument level

For instruments for which no quoted price is available, or that are ‘marked to model’, the price b/a spread should be obtained by multiplying half of the bid-ask of the risk factor by the sensitivities of the risk factor at the starting point.

#### Example 1: Application at instrument level

- Instrument sensitive to Interest Rate (where the sensitivity = modified duration = 5):

$$Price_{bid\_ask} = \frac{Yield_{bid} - Yield_{ask}}{2} * sensitivity = \frac{(1.20\% - 1.18\%)}{2} * 5 = 0.05\%$$

- Instrument sensitive to Credit spread (where the sensitivity = modified duration = 5):

$$Price_{bid\_ask} = \frac{Spread_{bid} - Spread_{ask}}{2} * sensitivity = \frac{(1.05\% - 1.02\%)}{2} * 5 = 0.075\%$$

- Instrument sensitive to Equity volatility ((where the sensitivity = Vega = 100.000 €)

$$Price_{bid\_ask} = \frac{Vol_{bid} - Vol_{ask}}{2} * sensitivity = \frac{(15\% - 14.5\%)}{2} * 100000 \text{ €} = 250\text{€}$$

### Deriving the stressed impact

When translating stressed b/a spreads to stressed reserves, the following guidance should be taken into account:

- The stressed price bid-ask should be obtained by multiplying the price bid-ask by the sum of shocks (liquidity and model uncertainty if applicable) provided in the scenario as described in box 15 of the Methodological Note (section 3.4.2)
- The total impact on reserves for a single instrument should be obtained by multiplying the stressed b/a spread by the Notional value (for bonds, exchange traded derivatives, IR and FX swaps) or by the fair value for equities.

#### Example 2

Taking into account the stressed bid-ask spread computed in Example 1, assuming a notional value of €1 mln for all instruments and that a quotation of 100% is equivalent to par, a liquidity shock of 230%, a L2 shock of 180% and an L3 shock of 220%:

- The total impact on reserves for a L1 instrument such as a sovereign bond with a stressed bid-ask spread equal to 0.05%, will be = 0.05% (230%)\*1,000,000€ = 1,150€;
- The impact on reserves for an L2 instrument, such as a corporate bond sensitive to interest rate (IR) and credit spread risk will be the sum of the two components:



- Interest rate component:  $0.05\% * (230\%+180\%) * 1,000,000\text{€} = 2,050\text{€}$ ;
- Credit spread component:  $0.075\% * (230\%+180\%) * 1,000,000\text{€} = 3,075\text{€}$ .
- The total impact on reserves for the L2 corporate bond would be the sum of IR and credit: 5,125€;
- For an L3 instrument, such as a credit linked bond sensitive to IR and credit:
  - Interest rate component:  $0.05\% * (230\%+220\%) * 1,000,000\text{€} = 2,250\text{€}$ ;
  - Credit spread component:  $0.075\% * (230\%+220\%) * 1,000,000\text{€} = 3,375\text{€}$
  - The total impact on reserves for the L3 credit linked bond would be the sum of IR and credit: 5,625€.

### Portfolio level application

When applying the methodology at portfolio level (portfolio exemption) banks should derive the stressed bid-ask spread by multiplying half of the risk factor bid-ask spread times the shocks given by the scenario. The impact on reserves is obtained by multiplying the stressed bid-ask spread by the sensitivities of the risk factor at the starting point and by the fair value of the exposure. In the case of portfolio level application, the sensitivities should be considered in terms of amounts (i.e. in case of IR, the amount of Euro coming from a 1 bps change in the yield and not the duration).

#### Example 3

L2 portfolio sensitive to IR and credit spread: assuming a sensitivity equal to 500€ for both interest rate and credit spread, a nominal value of 1mln, and stressed bid-ask spreads for interest rate and credit spread derived in Example 1, the impact on reserves for the portfolio will be the sum of:

- Interest rate risk factor:  $\frac{(1.2\%-1.18\%)*10000}{2} * (230\% + 180\%) * (500) = 2,050\text{€}$
- Credit spread risk factor:  $\frac{(1.05\%-1.03\%)*10000}{2} * (230\% + 180\%) * (500) = 3,075\text{€}$

The total impact on reserves for the L2 portfolio is the sum of IR and Credit spread: 5,125€

- For an L3 portfolio or instrument sensitive to IR, credit spread and correlation, the stress is:

- Interest rate:  $\frac{(1.2\%-1.18\%)*10000}{2} * (230\% + 220\%) * (500) = 2,250\text{€}$
- Credit spread:  $\frac{(1.05\%-1.03\%)*10000}{2} * (230\% + 220\%) * (500) = 3,375\text{€}$
- Correlation:  $\frac{(51\%-50\%)}{2} * (230\% + 220\%) * (0.01 * 1.000.000) = 225\text{€}$

The impact on reserves for the L3 portfolio is the sum of IR, credit spread and correlation: 5,850€

161. The overall impact of the adverse scenario on reserves shall also be allocated to the “Accounting Reserves” and “Additional Valuation Adjustments” columns of the CSV\_MR\_RESERVE template following the relative ratio at the starting point.

162. The overall impact of the adverse scenario on reserves is sourced from the CSV\_MR\_RESERVE template by the CSV\_MR\_SUM template.

### 2.3.4 CSV\_MR\_PROJ

163. This template contains a first table for the projections of net trading income and client revenues related to items held with a trading intent and their related economic hedges. In this template, banks are requested to provide historical annual NTI without the net interest income components as defined in paragraph 230 of the Methodological Note, for the period 2020-2024. In addition, banks are required to provide the annual client revenue projections for the period 2025-2027.

164. Moreover, as described under paragraph 296 of the Methodological Note, CA-adv and CA banks should provide in the second table, the historical breakdown of NTI (as defined in FINREP) on a quarterly basis from 2020 to 2024, broken down by: (i) Client revenues, (ii) P&L due to price movements, (iii) NII component removed from NTI, (iv) Other net trading income. In addition, CA banks should provide, on a yearly basis, the following memo items: the part of NTI coming from day-one profit or loss (yearly flow) and the amount of day-one reserve over the year based on the definitions as below. In line with paragraph 314, TE that provide evidence to their CA through the explanatory note to having generated client revenues from 2022 to 2024 banks, should also report client revenues in this template.

- (i) Day-one profit or loss: the fair value impact of new financial instruments that at the end-of-day (due to market fluctuations, passage of time and other factors) have a fair value price that differs from the transaction price;
- (ii) Day-one reserve: sum of the amounts that are reserved for day-one profits that cannot be directly recognized in P&L. This is because the fair value estimation at the end-of-day of new financial instruments (mainly L3) is too uncertain, due for instance to the use of unobservable inputs.

#### Box 4: Examples on client revenues

According to the definition reported in paragraph 232 of the Methodological Note, client revenues should include only items (among the three specified categories) held with a trading intent.

This box provides some examples on possible items that should be considered as part of client revenues based on the definition reported in paragraph 232 of the Methodological Note.

- (i) Examples for retained portion of or a mark-up on the bid-ask spread, generated from market making or trading activities on behalf of external clients:
- Component of the difference between the wholesale transaction price and the client transaction price for an interest rate swap traded between a bank and a pension fund.
  - Bond price mark-up on the bid-ask spread; buying a Corporate Bond from a market participant to sell it to another client above the wholesale price.



- (ii) Examples for prime services revenues:
- Mark-up on an equity short transaction between the bank and a hedge fund client
  - Revenues from execution and custody services
  - Revenues from margin financing
  - Revenues from securities lending

165. Client revenues as defined in the Methodological Note are related only to items held with a trading intent, therefore it shall not include “fee and commission income” which, according to FINREP Annex 5, excludes items measured at fair value through profit or loss.

### 2.3.5 CSV\_MR\_CCR

166. This template contains information on the bank’s 10 largest counterparties, and the two most vulnerable counterparties selected from the 10 largest, as well as the calculation logic for stressed CCR provisions, according to section 3.7 of the Methodological Note.

167. The CCR provision feeding the P&L is calculated considering the default of the two most vulnerable counterparties (i.e. the PD for these two counterparties is considered equal to 1). The 'jump to default' related to the default of the two counterparties is also computed.

168. Regarding the columns, banks are requested to provide the current exposure (market value) of CCR exposures, current exposure (market value) of CCR exposures net of collateral and other eligible credit risk mitigation, CVA impact on P&L, the jump-to-default exposures, the external and internal PDs (numerical values between 0 and 1), as well as stressed current exposure and stressed LGDs. Further, the Share of Cash Collateral (%), defined as the amount of cash collateral divided by the market value of the exposure, should also be reported. In line with Box 19 of the Methodological Note, the different types of exposures required to be reported in ColNum 3, 4, 10 and 11 as well as the jump-to-default exposures required to be reported in ColNum 15 of the CSV\_MR\_SUM template shall be floored at zero (i.e. negative amounts are not permitted).
169. The 3-year horizon PD is the probability of the counterparty defaulting within the 3 years of the stress horizon. As outlined in paragraph 321 of the Methodological Note, relevant instructions from Section 2 of the Methodological Note (“Credit risk”) should be observed. This implies that the stressed LGD to be used should reflect each counterparty’s default in the first year, in line with a LGD that would be used for the default of the counterparty, as in the adverse scenario of the credit risk methodology, with perfect foresight over the 3-year stress horizon and beyond.
170. In line with box 19 of the Methodological Note, if external rating does not exist and external PD cannot be estimated the institutions should use their internal models to estimate the point-in-time PD within the 3 years stress test horizon.
171. In case either the internal or the external PD cannot be provided, the bank should report the PD that is not available as equal to zero. In case both internal and external PDs are not available, the bank should apply the upper value reported in Annex I of Commission Implementing Regulation (EU) 2016/1799 based on the Credit Quality Step of the obligor, which are specified in Annex II of the same regulation. In all cases, the bank should consider the PD range restriction specified in the Box 20 of the Methodological Note.
172. The rows show the 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> most vulnerable counterparties, as well as the 10 largest counterparties. Banks shall consolidate the exposures to be reported in the rows of the CSV\_MR\_CCR at counterparty group level, assign them to the ultimate parent and provide the unique LEI of the ultimate parent. In line with paragraph 306 of the Methodological Note, for EU counterparties that are subsidiaries of a non-EU credit institution, the parent shall not be included in the set of counterparties used to identify the 10 largest exposures: the exposure should be calculated separately and the bank should use the name and the PD of the subsidiary to fill the top 10 counterparties list. For non-EU counterparties that are subsidiaries of a non-EU credit institution, only the parent shall be included in the set of counterparties used to identify the 10 largest exposures: the bank should use the name and the PD of the parent to fill the top 10 list.

173. In line with paragraph 322 of the Methodological Note, indirect exposures to the issuer (i.e. credit derivatives) that are either part of a hedge accounting relationship or that are recognised as credit mitigation effects shall be considered under the CCR scope and for the computation of the jump to default. The jump to default exposure for these indirect exposures is the amount that the protection provider has committed to pay in the event of the default or non-payment of the borrower or on the occurrence of other specified credit events. For bought protection this amount should be regarded with a negative sign, which has to be netted with the corresponding positive exposure of the hedged position for the calculation of the jump to default exposure. Net profits resulting from an issuer's instantaneous default should be considered as zero and thus the column related to the jump-to-default exposures should be populated accordingly (i.e. only non-negative amounts are permitted).

174. The overall impact of the adverse scenario on counterparty credit risk losses is calculated by the CSV\_MR\_CCR template and linked via formula from this template to the CSV\_MR\_SUM template.

### **2.3.6 CSV\_MR\_REA**

175. This template contains actual year-end 2024 market risk REA components as well as the calculation logic for stressed projections. In this template banks are requested to provide the starting values for market risk REA as of 31 December 2024 (i.e., VaR, SVaR, APR and CVA -both before and after the floor) in line with article 364 of the CRR. Therefore, starting points should be reported as the maximum relevant risk number between the most recent one (last open day of 2024) and an average of the daily values of the risk measure (60-day period or 12 weeks period, in function of the risk measure) as stated in Article 364 of the CRR. If paragraph 320 of the methodology applies, then the related starting point REA figures should also include RNIV. Banks should report in the dedicated memo item the amount of REA for RNIV as an of which of the total market risk REA.

176. The rows show the STA risk exposure amount, the different components of VaR, sVaR, APR, and IRC and CVA before and after floor. The columns show the year and the scenario.

177. While in general the definitions of the Methodological Note apply, specific definitions under section 3.7 of the Methodological Note to be highlighted for the use of this template comprise:

- Banks modelling IRC should provide the stressed IRCs before floor application in this template. In order to model IRC, banks must estimate the stress impact in line with paragraph 316 of the methodology.
- Banks that are subject to a credit risk capital charge for CVA should provide the stressed CVAs before floor application in this template. In the advanced method for CVA, as

explained in Article 383 of the CRR, banks should simulate only changes in the credit spreads of counterparties.

178. The respective values after CVA / IRC floor are calculated by the CSV\_MR\_REA template and then linked via formula from this template to the CSV\_REA\_SUM template.

179. In line with paragraph 312 of the Methodological Note, the CVA capital requirement should be only computed for those exposures which are treated under the advanced method for CVA. For exposures under the standardised approach for CVA, the related capital requirement should be kept constant as of 31 December 2024.

180. Regarding APR, depending on whether the floor is binding or not, banks are requested to fill-in only one of the two rows (either RowNum 12 or RowNum 13) as explained in the footnote 1 of the CSV\_MR\_REA template.

181. In line with paragraph XX of the methodology Risk not in Model Engine, (RNIME) should be added to the starting point of the relevant component of CSV\_MR\_REA template and deducted from the “Other risk exposure amounts” reported in CSV\_REA\_SUM RowNum 14. The total amount of REA related to RNIME should be also reported as a memo item in RowNum 20 of the CSV\_MR\_REA template.

## 2.4 NII

### 2.4.1 CSV\_NII\_SUM

182. The sheet is composed of eight tables:

- **Summary table** where banks are required to report historical NII figures (interest income and interest expenses). In the template banks are requested to provide the historical interest income (including the breakdown of interest income corresponding to net non-performing exposures) and interest expenses for 2024 as well as volumes of performing and non-performing exposures and the total provisions for non-performing exposures as of 31 December 2024.
- **Parameters for EIR projections table** where banks are requested to provide the delta idiosyncratic component (bp), their rating as of end-2024, and whether they are a domestic bank.
- **Two tables for the reconciliation of positions that are linked between credit risk and NII** (separately for baseline and adverse) containing a reconciliation of the figures on non-

performing exposures and associated provisions between the credit risk and NII templates (i.e. CSV\_CR\_SCEN and CSV\_NII\_CALC tables). These tables are populated automatically.

- **Table for the reporting of regulated deposits.** In this table, banks are required to provide the volumes and the outcome of the regulated formula as of 31 December 2024 for regulated deposits of paragraph 399 of the 2025 EU-wide stress test methodological note. For the projections, banks are required to fill the outcome of the regulated formula for 2025, 2026 and 2027, both for the baseline and for the adverse scenario. The types of deposits recognised as being regulated products are hard-coded in the table and banks should provide the data only for the deposits within the hard coded list. The volumes reported for regulated deposits in CSV\_NII\_SUM dedicated tables shall match the volumes reported in the CSV\_NII\_CALC.
- **Table for reporting the legal floor deposits.** The table contains all types of deposits that are recognised as having a legal floor in line with paragraph 398 of the 2025 EU-wide stress test methodological note. Banks are required to provide the starting point volume and the corresponding legal floor as for 31 December 2024, both for the fixed and for the floating rate portfolios. For legal floor deposits in Hungary, banks are allowed to fill the white cell for a currency within the list of currencies in the “Input” sheet. The volumes reported for legal floor deposits in CSV\_NII\_SUM dedicated tables shall match the volumes reported in the CSV\_NII\_CALC
- **Table for the reporting of legally exempted products due to asset-liability matches.** In this table, banks are requested to provide the volume as of 31 December 2024, both on the fixed and on the floating side, for the products recognised as being exempted due to legally mandated asset-liability matches in line with paragraph 429 and paragraph 427 of the 2025 EU-wide stress test methodological note. For projections, banks will provide the projections for margin new business for both the baseline and the adverse scenario, for 2025, 2026 and 2027. In case the bank has other exemptions that are not in the pre-defined list, these will be filled in the white rows. The inputs are limited to up to two non-derivative Assets and up to two non-derivative Liabilities portfolios within the list of portfolios in the CSV\_NII\_CALC template. The country and currency are to be filled in by the banks but the input is limited to countries and currencies with the lists provided in the “Input” sheet. The starting point volumes reported in this table should match the starting point volumes reported for the corresponding portfolios in CSV\_NII\_FUNDING MATCH.
- **Table for the accrued interest cash flows from trading book instruments** This table collects the historical information for years 2022-2024 used for the projections of the NII of positions in scope of Section 4.5 of the 2025 EU-wide stress test methodological note. NII components which are reported in line with Section 4.5 of the methodological note are linked via formula to the CSV\_MR\_PROJ template. Banks shall report the NII on held-for-

trading defined according to paragraph 432 of the 2025 EU-wide stress test methodological note. Banks shall, for each of the NII streams in scope of this table, report the NII related to economic hedges as “of-which” items.

183. With regards to the summary template, the historical interest income and expenses shall be reported according to FINREP 02.00 rows 010 and 090, respectively, while for the of-which positions on interest income from net NPE and interest income and expenses from derivatives and held-for-trading reported as part of NII in FINREP shall be reported based on banks’ internal historical data.
184. In contrast, the adjusted interest income and expenses shall reflect any adjustments banks are required to report to align with the scope of projected NII in the Methodological Note (section 4.2). This means that the interest income/expenses (adjusted) will be equal to interest income/expenses (historical) if no such adjustments are needed. The adjusted interest income and expenses will be computed automatically based on the portfolio-level inputs reported in the CSV\_NII\_CALC and CSV\_NII\_FUNDING\_MATCH for the starting point. This will ensure a correct computation of caps. Banks shall report in dedicated white cells as “of-which” items of the adjusted interest income and expenses the amounts related to economic hedges. Banks shall also report the marginal contribution of derivatives exposures (split between income and expenses) and the relative interest income and expenses.
185. Banks shall report volumes of performing exposures (end of 2024) consistently with the templates CSV\_NII\_CALC and CSV\_NII\_CALC\_FUNDING MATCH, i.e. according with paragraphs 357,358, and359 of the Methodological Note.
186. For the projections, the CSV\_NII\_SUM template summarises the data on interest income, (including the breakdown of interest income corresponding to net non-performing exposures), interest expenses, which it sources from CSV\_NII\_CALC and CSV\_NII\_CALC\_FUNDING MATCH, (net) effective interest rate on both performing and non-performing exposures, and net interest income before and after the applicable methodological constraints. The projections on interest income, interest expenses and net interest income (after the applicable methodological constraints) according to both scenarios are then linked via formula to the CSV\_P&L template.
187. Regarding white cells where banks’ input is required, e.g. historical values, the sign convention follows the one applied for the projections. This implies in particular that historical expenses are to be reported with a negative sign.
188. The table also contains the methodological constraints that are automatically applied in the CSV\_NII\_SUM template and that include:



- The cap on the EIR applicable to non-performing exposures at aggregate level compared to the starting point under the adverse scenario;
- The absolute cap on NII projections under the adverse scenario, according to which assumptions cannot lead (at group level) to an increase of the bank's NII compared with the 2024 value under the adverse scenario;
- The absolute cap on NII projections before considering the impact of the increase of provisions for non-performing exposures on interest income compared to the starting point, under the adverse scenario.

The calculation of the accrued interest from held-for trading positions net of economic hedges and the addition of these amounts to the total NII after the application of the cap on NII, in line with Section 4.5 of the methodological note.

189. While with regards to parameters for EIR projections within CSV\_NII\_CALC in general the definitions of the Methodological Note apply, specific definitions to be highlighted for the use of this template comprise:

- The delta idiosyncratic component (bp) requested in this template refers to the  $\Delta$  idiosyncratic component under the adverse scenario in section 4.4.2.a of the Methodological Note.

190. To fill the other tables corresponding to the credit risk and NII reconciliation, banks must report country/currency breakdown in the Input sheet. Tables will be automatically updated.

#### **2.4.2 CSV\_NII\_CALC**

191. The sheet is composed of three main sections:

- Fixed rate portfolio;
- Floating rate portfolio;
- NII calculation for the total (fixed and floating rate) portfolio.

192. The separate sections on fixed and floating rate portfolios contain the following sub-sections:

- Starting point data where banks are required to report average and end of the year data on volumes and EIR (for both performing and non-performing exposures), based on which the adjusted interest income and expenses are calculated at portfolio level, as well as the

average original maturity,<sup>24</sup> the average last date of repricing, and the maturity schedule at the cut-off date (for performing exposures only).

- Projections (separately for baseline and adverse scenario) will be filled based on the NII calculations tool, for all portfolios that are subject to a centralised approach. For the memo items, banks are required to report the projections of EIR split between existing, maturing and new for both margin and reference rate, and the EIR on non-performing exposures (volumes and provisions are automatically updated). Furthermore, for the derivatives portfolios, the reference rate projections will be filled based on the NII tool output, while banks are required to report the margin component projections.

193. The average volume is defined as per paragraph 358 of the Methodological Note.

194. The average EIR is the interest income/expense earned over the year divided the average volume of the year.

195. The end of the year volume is defined as per paragraphs 357 and paragraph 359 of the Methodological Note. Banks shall report volumes as gross carrying amounts for instruments at amortised cost and as notional amount for all instrument at fair value including FVOCI. Therefore, premium discounts are reflected in the reported EIR according to paragraph 184 of this Template Guidance and then subject to stress only for instrument at amortised cost.

196. The end of the year EIR is the notional-weighted average of the instruments being on the balance sheet at the end of the year.

197. Reference rate and margin are defined according to paragraphs 353 and 354 of the Methodological Note, respectively. At portfolio level, margin and reference rate are volume-weighted. For non-performing exposures no split between margin and reference should be done and banks must directly report the net volume-weighted EIR.

198. Interest income and expenses refer to the marginal contribution of each asset and liability type at country/currency level.

199. The average last date of repricing is defined as per paragraph 369 of the Methodological Note. For each portfolio, the last date or repricing must be calculated by banks at instrument level and the average shall be reported in the CSV\_NII\_CALC and CSV\_NII\_CALC\_FUNDING\_MATCH, following the logic described in the example below:

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<sup>24</sup> The average original maturity should not be rounded to an integer. Instead, the general provisions on rounding as laid down in section 1.3 apply. Furthermore, the reporting of AOMs should be consistent between the total volume and the "of which" categories for each portfolio.

The bank has the following portfolio for which it should consider the EUR SWAP curve with tenor 6-months based on the AOM of the portfolio,

#### Portfolio reported in CSV\_NII\_CALC

Volume portfolio	1000
AOM portfolio	0.5
Currency	EUR

The portfolio is composed of 3 instruments,

	Instrument 1	Instrument 2	Instrument 3
Volume	200	300	500
Last date of repricing (reported as fraction of the year, monthly level)	0.17	0.42	0.83

Month	EUR SWAP 6M	Fraction of the year
1	-0.552	0.08
2	-0.533	0.17
3	-0.458	0.25
4	-0.416	0.33
5	-0.338	0.42
6	-0.195	0.50
7	0.246	0.58
8	0.654	0.67
9	1.173	0.75
10	1.704	0.83
11	1.973	0.92
12	2.132	1.00

The monthly end-of month values for the EUR 6M SWAP curve in the starting point year:

In this context, the bank will perform the following calculations:

- Determine the corresponding SWAP value for each instrument in the portfolio.
- Calculate de volume-weighted average SWAP value: Average SWAP value =  $(-0.533*200 + -0.338*300 + 1.704*500)/1000 = \mathbf{0.644}$
- Determine the closest value of the SWAP curve corresponding to the Average SWAP value.

	Instrument 1	Instrument 2	Instrument 3
Volume	200	300	500
Last date of repricing (reported as fraction of the year, monthly level)	0.17	0.42	0.83
Corresponding value of the SWAP curve	-0.533	-0.338	1.704

The closes value on the SWAP curve to the SWAP value is 0.654 (minimum difference in absolute value to 0.644). This value of the SWAP curve was recorded in **month 8** of the starting point year. Month 8 has the corresponding fraction of the year 0.67 (8/12).

According to this the bank should report the average last date of repricing in the CSV\_NII\_CALC template for this portfolio as 0.67.

Month	EUR SWAP 6M	Fraction of the year	Difference (abs value) to the average SWAP value
1	-0.552	0.08	1.196
2	-0.533	0.17	1.177
3	-0.458	0.25	1.102
4	-0.416	0.33	1.06
5	-0.338	0.42	0.982
6	-0.195	0.50	0.839
7	0.246	0.58	0.398
8	<b>0.654</b>	0.67	<b>0.01</b>
9	1.173	0.75	0.529
10	1.704	0.83	1.06

Month	EUR SWAP 6M	Fraction of the year	Difference (abs value) to the average SWAP value
11	1.973	0.92	1.329
12	2.132	1.00	1.488

200. The NII calculation section for the total (fixed and floating rate) portfolio contains the following sub-sections:

- The average point of maturing (APM) provided directly according to Methodological Note;
- Interest income / expenses on performing exposures before considering migration effects (separately for margin and reference rate);
- Adjustment to interest income to account for the migration of performing exposures to non-performing exposures;
- Interest income on non-performing exposures after considering the migrations from performing to non-performing status during the scenario horizon;
- Total interest income / expenses before FX adjustments as the sum of interest income / expenses on performing exposures before considering migration effects, adjustment to interest income to account for migrations and the interest income on non-performing performing exposures after migrations.
- Under the adverse scenario, the total interest income / expenses will be subject to an automatic FX adjustment based on the exchange rate variations included in the Input template.

201. The rows show combinations of asset / liability types split at country/currency level (incl. the residual category other/other) and the aggregate positions (sum/sum) which is automatically updated based on the country/currency breakdown reported in the Input template. Banks shall refer to FINREP tables 2, 4, 8, 16, 18 and 20 for the counterparties/geographical breakdowns. While in general the definitions of the Methodological Note apply, specific definitions to be highlighted for the use of this template comprise:

- The determination of material country/currency pairs is covered under section 4.3.6.e as well as Box 21 of the Methodological Note;
- Derivatives refer to section 4.3.6.b of the Methodological Note;

- Apart from the provisions on sight deposits following paragraphs 365, 3664 and 367 as well as section 4.3.6.c of the Methodological Note, banks shall generally report within:
  - “Liabilities - Deposits (exc. repo) – Central Banks” only those included in FINREP table 8.1 row 060 if they fulfil the requirements in paragraph 365 and, where applicable, paragraphs 3662 or 3673, or paragraph 36864;
  - “Liabilities - Deposits (exc. repo) – General Governments – sight” only those included in FINREP table 8.1 row 110 if they fulfil the requirements in paragraph 361 and, where applicable, paragraphs 366 or 367;
  - “Liabilities - Deposits (exc. repo) – Credit Institutions and other financial corporations - sight” only those included in FINREP table 8.1 row 160 and 210 if they fulfil the requirements in paragraph 365 and, where applicable, paragraphs 366 or 367;
  - “Liabilities - Deposits (excl. repo) - Non-financial corporation - legal floor/regulated - sight” only those included in FINREP table 8.1 row 260 if they fulfil the requirements in paragraphs 365, and 366 or 367;
  - “Liabilities - Deposits (excl. repo) - Non-financial corporation - other - sight” only those included in FINREP table 8.1 row 260 if they fulfil the requirements in paragraph 365, and they do not fulfil the requirements in paragraphs 366 and 367;
  - “Liabilities - Deposits (excl. repo) – Household – legal floor/regulated - sight” only those included in FINREP table 8.1 row 310 if they fulfil the requirements in paragraphs 365, and 366 or 367;
  - “Liabilities - Deposits (exc. repo) – Household - other – sight” only those included in FINREP table 8.1 row 310 if they fulfil the requirements in paragraph 365, and they do not fulfil the requirements in paragraphs 366 and 367.
  - Deposits which fulfil the definition of sight deposits as per paragraph 365 and, where applicable, paragraphs 366 or 367, but which are not reported as overnight deposits in FINREP table 8.1 rows 120, 170, 220, 270, or 320, should be classified as sight deposits, respectively. In this case, banks are required to provide supporting evidence for the classification as sight deposits in the Explanatory Note.
  - All the above reported instructions shall be netted of repurchase agreements that shall be reported within the “Liabilities - Deposits – Repo”. Therefore, this category shall refer to FINREP table 8.1 rows 100, 150, 200, 250, 300 and 350.

- For “Liabilities – Debt securities issued”, banks shall refer to FINREP table 8.1 row 360, i.e. for “Certificates of deposits” to row 370, for “Asset-backed securities and covered bonds” to rows 380 and 390, and for “Hybrid contracts and other debt securities issued” to rows 400 and 410.

202. In case of a change in the country/currency due to the introduction of the Euro as per 31 December of the starting point year, the following shall apply:

- (i) The data denominated in the “old” currency as of 31 December of the starting point year should be treated as denominated in EUR for the purpose of projections. As of 31 December 2024 the volume under the “old” country/currency pair should be maintained in the CSV\_NII\_CALC template but for the reporting of relevant volumes as of end of the starting point year and the projections, banks should apply the exchange rate as of 31 December of the starting point year in line with paragraph 35 of the Methodological Note to translate these volumes and relevant projections into EUR.
- (ii) The algorithm to determine the materiality of the country/currency breakdown described in Box 21 of the EBA MN must be performed on the exposures as of 31 December of the starting point year and considering exposures under the “old” country/currency and exposures under the “new” country/EUR as separate in line with paragraph 35 of the Methodological Note. Therefore, the change of the currency shall not have an effect on determining the most material country/currency pairs.
- (iii) For the reference rate on new business of the starting point year for the “old” currency, banks shall use the EUR swap rates provided in the scenario. For reporting the reference rate at the starting point banks shall refer to paragraph 382 of the EBA MN. To report margin at the starting point banks shall refer to paragraph 383 of the EBA Methodological Note. However, the total EIR reported for the “old” currency exposures should ensure that the total NII earned in EUR in the starting point year is equal to the total NII earned by the portfolio in “old” currency in the starting point year. Any difference of the total EIR should be reflected at the starting point margin component. During the stress test horizon, projections of EIR components must be calculated consistently with the scenario EUR rates.
- (iv) Regarding the calculation of the delta sovereign spread, the EUR SWAP rates are used in this case.

203. Banks shall report the reverse repo on the asset side under loans and advances within the portfolio that corresponds to the sector of the counterparty. For example, a reverse repo to a corporate is reported in “Assets - Loans and advances - Non-financial corporations”.

204. For the reporting of sight deposits, banks should report the split between margin and reference rate in in the CSV\_NII\_CALC template line with the Methodological Note as illustrated in the following examples. The projections of both the margin and the reference rate will be automatically filled via the NII calculation tool.<sup>25</sup>

- *Regulated sight deposits*: assuming an EIR of 40 bps as the outcome of the regulatory formula, a risk-free rate of -30 bps filled in accordance with paragraph 382 of the methodological note, for year 2024, the margin, reference rate and EIR is reported as follows:

	<b>2024</b>
Scenario	-30
Margin	0
Reference	40
<b>EIR</b>	<b>40</b>

- *Legal floor sight deposits (excluding households and non-financial corporations)*: assuming a starting point EIR of 11 bps, a legal floor of 10 bps, a risk-free rate of -30 filled in accordance with paragraph 382 of the methodological note for year 2024, the margin, reference rate and EIR are reported as follows:

	<b>2024</b>
Scenario	-30
Margin	1
Reference	10
<b>EIR</b>	<b>11</b>

- *Other sight deposits (only households, not subject to legal floor)*: assuming a starting point EIR of 1 bps ,a risk-free scenario of -30 filled in accordance with paragraph 382 of the methodological note bps for years 2024, the margin, reference rate and EIR are reported as follows:

	<b>2024</b>
Scenario	-30
Margin	1
Reference	0
<b>EIR</b>	<b>1</b>

- *Other sight deposits (excluding households and non-financial corporations, not subject to legal floor)*: the reference rate should move in a one-to-one relation with the risk-free

<sup>25</sup> For illustrative purposes, below examples rely on a reference rate pass-through of 100%, unless they are specifically for sight deposits from households or non-financial corporations. The reference rate pass-through for households and non-financial corporations sight deposits for the calculation of the reference rate should be calculated in accordance with paragraph 398 of the Methodological Note.



rate. Assuming an EIR of 0 bps at the starting point, a risk-free rate of -30 filled in accordance with paragraph 382 of the methodological note, , the margin, reference rate and EIR are reported as follows:

	<b>2024</b>
Scenario	-30
Margin	30
Reference	-30
<b>EIR</b>	<b>0</b>

205. The CSV\_NII\_CALC and the CSV\_NII\_FUNDING MATCH template calculate the interest income and interest expenses projections based on the detailed input parameters populated by the banks. These projections are then linked via formulas from this template to the CSV\_NII\_SUM template.
206. Forward rate agreements (FRA), swaptions and other contracts with embedded derivatives (e.g. caps/floors) shall be treated according to paragraph 370 of the Methodological Note. For example, for a forward-rate agreement that becomes effective in 12 months with a termination period of 12 months, the EIR in 2024 and 2025 is 0. The EIR (on new business) is set to the rate as contracted in the FRA as it becomes effective in 2026. The volume of the FRA is to be reported already in 2024.

### **2.4.3 CSV\_NII\_CALC\_FUNDING\_MATCH**

207. This template follows the exact same structure as CSV\_NII\_CALC.
208. Banks are required to fill the starting point sections, for the fixed and floating rate portfolios only for the exposures which are in scope of paragraphs 427 and 429 of the 2025 EU-wide stress test methodological note.
209. The volume and the margin new business shall be equal to the corresponding starting point volume and margin new business reported in the CSV\_NII\_SUM template, in table Legally exempted new business. The portfolios, country, and currency metadata information are linked via formulas to the corresponding table of the CSV\_NII\_SUM template (see paragraph 182).
210. The projections, both for the fixed and floating portfolios, baseline and adverse, will be filled based on the output of the NII tool ran centrally consistently with the projections of the CSV\_NII\_CALC template. For this template, the projections corresponding for margin new business, for the baseline and adverse scenario, for 2025, 2026, and 2027 will be consistent with the values reported by the bank in CSV\_NII\_SUM, table Legally exempted new business, for the corresponding products.

## 2.5 Conduct risk and other operational risks

### 2.5.1 CSV\_OR\_GEN

211. This template summarises and processes actual and projected conduct and other operational risk losses. In the template, all banks are requested to provide information on historical and projected conduct risk losses and other operational risk losses (both number of loss events and total loss amounts). In general, the historical and starting point losses should be reported in line with the latest COREP instructions<sup>26</sup>, however, the losses should be reported in the year of P&L recognition and not in the year of reporting in COREP. In addition, all banks should provide data on historical material and non-material conduct risk losses and total loss recoveries both for conduct and other operational risk. While template CSV\_OR\_GEN summarises all the conduct and operational risk losses, template CSV\_OR\_CON contains additional details on material conduct risk losses.
212. Banks shall report their capital requirements for operational risk (which includes both conduct risk and other operational risks) for the starting point (31 December 2024) based on the approach that they are using, either the AMA or basic and standard approaches.
213. Banks are required to restate total capital requirements for operational risk at the starting point according to the CRR3, including providing transitional capital requirements, if they apply the Alternative Standardised Approach according to CRR3 Art. 314 (2a and 2b).
214. The rows cover losses / number of loss events for conduct risk, other operational risk and historical material conduct risk events, as well as gross loss and total loss recovery. Losses and increases of provision are reported in the template as positive numbers, while loss recoveries as negative numbers. The columns require a breakdown of this data according to the different scenarios and years.
215. While in general the definitions of the Methodological Note apply, specific definitions and rules covered in section 5.3.1 of the Methodological Note to be highlighted for the use of this template comprise:
- Relevant indicator (mIn EUR) (as defined Article 316 of the CRR) should be provided by all banks. It will be used as an indicator for the fall back solution. The field highest threshold applied internally for data collection (EUR) has to be filled in EUR (i.e. not in mIn EUR);

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<sup>26</sup> <https://www.eba.europa.eu/risk-analysis-and-data/reporting-frameworks/reporting-framework-3.2>

- Unless a bank is unable to report relevant historical losses for conduct risk and other operational risks, or it has been explicitly requested by the competent authorities (as explained in 5.4.3. of the Methodological Note), the drop-down menus for the ‘Fall-back solution’ should be set to ‘N’.
- Business indicator component (mln EUR) (as defined in Article 313 of the CRR3) should be provided by all banks.

216. Projected losses arising from historical and new material conduct risk losses are automatically sourced from template CSV\_OR\_CON if the qualitative approach is applicable according to section 5.4.1 of the Methodological Note. The template, furthermore, applies the floors for the projected stressed conduct risk losses, other operational risk losses and total operational risk exposure amounts for the baseline and adverse scenario. The floor for projections linked to material conduct risk events is used only for quality assurance purposes for the adverse scenario. The template applies a floor for the projected total REA in both scenarios by keeping it constant across the horizon and equal to the restated starting point REA (31 December 2024). The total amount of gross losses is linked via formula from this template to the CSV\_P&L template, while total REA are linked via formula from this template to the CSV\_REA\_SUM template.

### 2.5.2 CSV\_OR\_CON

217. This template contains information on historical and new material conduct risk losses. For historical material conduct risk events the template includes historical data on losses and provisions and projections of losses for the 3-year horizon, while for the new material conduct risk events it includes only projections of losses for the 3-year horizon. In line with section 5.4.1 of the Methodological Note, banks are requested to provide information on the top 25 historical (2020-2024) and new material conduct risk losses (if any) for the projection of the P&L impact of the historical and new material conduct risk events. In addition, banks should provide the stock of provisions for those events in 2019 and 2024, and aggregate losses (not by individual loss event) linked to historical and new material conduct risk events that were not among the 25 most material conduct losses in each category (new and historical). Losses should be mapped to SREP conduct risk subcategories as well as operational risk event type (both drop-down menus). Furthermore, material conduct risk losses not included in the top 25 material conduct risk losses should be reported including the breakdown by operational risk event type. Banks should provide a short, identifiable and unique name for each reported material conduct risk event (up to 40 characters). Losses and increases of provision are reported in the template as positive numbers, while provision releases as negative numbers.

218. The rows show the top 25 historical/new material conduct risk events. The columns of the template break those numbers down by type of loss event, stock of provisions and historical observed losses and loss projections.
219. Aggregate projected losses arising from historical and new material conduct risk losses of individually / not individually reported loss events are sourced from template CSV\_OR\_CON by the CSV\_OR\_GEN template.
220. Banks applying the quantitative approach shall not populate the material conduct risk template (CSV\_OR\_CON).

## 2.6 Non-interest income, expenses and capital

### 2.6.1 CSV\_REA\_SUM

221. This template shows total risk exposure amounts across all risk types. It contains end-2024 figures, restated figures as of 31 December 2024 under CRR3, and projected stressed figures under the baseline and adverse scenario. While most of the data in this template is sourced from other templates, banks have to populate the risk exposure amount for contributions to a default fund of a CCP as of 2024, other risk exposure amounts for all years and other standardised risk exposure amounts for the restated figures and the projected years. Furthermore, as a memorandum item, DTAs subject to a 250% risk weight should be reported in this template following the treatment example in Table 7 of this guidance (i.e. after application of the 250% risk weight)<sup>27</sup>.
222. The rows show the breakdown of REA for credit risk, market risk, operational risk and other risks. The columns include the breakdown of this data for end of year 2024, for restated figures as of 31 December 2024 under CRR3, and for projected end of year figures both for the baseline and for the adverse scenario.
223. The positive difference between the IRB REA floored on the basis of Article 458 of the CRR and the projected IRB REA (reported in CSV\_CR\_REA\_IRB, “Total Risk Exposure Amount IRB exposures after floor”) shall be reported in the row ‘Other risk exposure amounts’ in the CSV\_REA\_SUM template. The equivalent amount using the standardised approach should be reported in the row ‘Other Standardised risk exposure amounts’ in the CSV\_REA\_SUM template.

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<sup>27</sup> DTAs subject to a 250% risk weight should already be included for the starting point in “Risk Exposure Amount for Credit Risk Exposures”. For the stress test projection horizon, their evolution should be reflected in “Other risk exposure amounts” (in RowNum 14 of the CSV\_REA\_SUM template) and in “Other Standardised risk exposure amounts” (in RowNum 26 of the CSV\_REA\_SUM template).

224. Most data is automatically sourced from other templates: credit risk REA from CSV\_CR\_REA\_STA, CSV\_CR\_REA\_IRB, CSV\_CR\_SEC\_SUM, and credit risk SREA from CSV\_CR\_REA\_OF and CSV\_CR\_SEC\_SUM; market risk REA from CSV\_MR\_REA; operational risk from REA and SREA CSV\_OR\_GEN; Total REA from CSV\_CAP. The data reported in this template is then extracted by the TRA\_REA template.
225. As explained in paragraph 181 of this document, banks should not report RNIME in RowNum 14 of the CSV\_REA\_SUM template to avoid double counting. Concerning “Other own initiative capital buffers”, they should be reported in CSV\_REA\_SUM RowNum 14. Due to the static balance assumption, “Other own initiative capital buffers” are assumed to remain constant at the level reported for the reference date 31 December 2024 under both the Baseline and Adverse scenarios.

### 2.6.2 CSV\_NFCI\_DIV

226. This template contains information and the stress test calculation logic for net fee and commission income, dividend income, and the ‘share of the profit or (-) loss of investments in subsidiaries, joint ventures and associates accounted for using the equity method’. In this template banks are requested to provide ‘net fee and commission income’. Furthermore, dividend income and the ‘share of the profit or (-) loss of investments in subsidiaries, joint ventures and associates accounted for using the equity method’ should be provided.
227. The rows show the P&L items in scope. The columns require the breakdown by year, scenario applied and for the adverse scenario the differentiation if modelled figures are provided.
228. NFCI is projected using the prescribed growth rate parameters. NFCI projections consider FX variations to the starting point. Both the projections and the variations to the starting point are automatically calculated based on the currency breakdown provided in the input template.
229. Banks are required to use their own methodologies for projecting dividend income and the ‘share of the profit or (-) loss of investments in subsidiaries, joint ventures and associates accounted for using the equity method’ items for the baseline scenario. For the adverse scenario, as prescribed in the Methodological Note, banks can decide to use their internal models to model their projections: in this way, they would be subject to approach (i), which prescribes a minimum reduction based on their 2024 value; alternatively, banks can decide not to model their projections and be subject to an automatic more severe reduction (approach (ii)).
230. While for the two items described in paragraph 229 all banks are expected to fill the columns relevant to the baseline scenario, only banks that decide to model their projections are required to fill in the respective lines of the P&L item provided for the adverse scenario. In

this way, they will be subject to approach (i) ‘minimum reduction’, while banks that leave the relevant cells blank will be automatically subject to the formula for approach (ii) ‘more severe reduction’. Columns with references to FINREP templates and general comments are also provided. For NFCI banks should not fill the cells for the baseline or the adverse scenario as projections are produced automatically.

231. The floors and caps for the calculation of the stressed projected values as well as the calculation logic for approach (i) and approach (ii) as covered in section 6.4.1 of the Methodological Note have been implemented in this template.
232. Banks are required to follow the guidance provided in Box 31 of the Methodological Note regardless of the impact that the use of own models would entail (i.e. even if the impact of own models is higher than applying the simplified approach). Banks can in any case decide not to model their projections and be subject to the simplified approach (as outlined in option (ii) of Box 31 of the Methodological Note).
233. In line with the methodology, in case of a zero starting point value for dividend income and zero or negative starting point value for the share of the profit of investments in subsidiaries, joint ventures and associates accounted for using the equity method, the approaches above are modified as follows for the adverse scenario:
- Approach (i): if a bank decides to project its (negative) income, the starting point value in 2024 is used as a cap, which means that the (negative) income cannot be higher than the 2024 value;
  - Approach (ii): if a bank decides not to project its (negative) income, no impact is assumed in the projection, which means that the projections will be equal to the value at end-2024 for each year of the scenario.
234. The projected figures after the application of the caps are aggregated in the top of the template and linked via formula to the CSV\_P&L template.

### **2.6.3 CSV\_ONEOFF**

235. This template contains information on one-off events. Such events are defined in the Methodological Note as exceptional occurrences that produce an extraordinary cost during the year prior to the launch of the exercise. As long as the full compliance with the methodology is ensured, banks are allowed to “remove” this exceptional cost from the starting point for the P&L expenses listed in the section, and in this way increasing the relevant floor through a “one-off adjustment”.

236. Banks may submit up to 5 one-off adjustments (for up to 5 P&L items) which from their view should be applied to the constraints on section 6.4.2 of the Methodological Note. These shall include information on the event as well as historical and projected pre-tax P&L effects out of those adjustments for the P&L items in scope only.
237. Both the P&L item affected and the category of the event shall be selected from a drop-down list provided in the template. No P&L items out of the provided lists (i.e. out of the scope of one-off adjustments) will be allowed by the formulas. Free-text cells are included for the name and short description of the event. If a bank decides to submit one or more one-off adjustments, it is required to fill all the white cells relevant to the row of the submitted event.
238. After the descriptive cells, banks submitting one or more one-off adjustments are required to provide the pre-tax projected impact of the event on P&L items affected. The pre-tax projected values shall not be adjusted for FX effects. If the extraordinary event is believed to increase the eligible P&L expense in 2024, the sign of the pre-tax impact of the event included in the 2024 P&L should be negative. This should in turn produce a positive projected pre-tax impact to account for the lower base of the cost item in the three years of the scenarios in this template (CSV\_ONEOFF).
239. According to section 6.4.2 of the Methodological Note, the formula implemented in ColNum 14 and ColNum 15 will calculate the total impact of the event (i.e. the sum of the projections divided by the 2024 total REAs). The total impact in mln EUR is automatically calculated from the bps impact in ColNum 16 to ColNum 21 of the template.
240. The total impact for each P&L item is then automatically provided in RowNum 6 to RowNum 10 of the template. The impact recognised in the CSV\_P&L for one-off events affecting remaining 'Other operation expenses', 'Depreciation', 'Other provisions or reversal of provisions' and 'Cash contributions to resolution funds and deposit guarantee schemes' is linked automatically to its respective memorandum item line in the CSV\_P&L template under both the baseline and adverse scenario below the relevant P&L item affected. The impact recognised for one-off events affecting 'Other remaining administrative expenses' is only linked automatically to the memorandum item line in the CSV\_P&L template under the baseline scenario below the relevant P&L item affected. For this reason, both the impact on the starting point and on the projected figures shall be related to the P&L item selected in the relevant cell under ColNum 2 of the CSV\_ONEOFF template. No other impact from other P&L items than the one selected shall be included.
241. During the quality assurance phase, events with a total impact of less than 5 bps will be rejected.
242. For one-off events affecting more than one eligible P&L line item, banks are required to report the P&L impacts in separate lines of the CSV\_ONEOFF template, one for each eligible

P&L item affected. This means that, in the case of one-off events with impact on more than one eligible P&L items, the sum (net) of the impacts on the different P&L items for the same event should exceed the 5 bps threshold. In such cases, the institution should report the P&L impacts in separate lines of the CSV\_ONEOFF template, one for each eligible P&L item affected. The limit of five maximum P&L items in total and for all the one-offs holds.

243. The methodological approach for the projection of the impact is enforced by a number of checks in the formula: if the projections provided by filling the ‘Pre-tax projected impact of event on P&L items affected’ are less conservative than the starting point impact, the formula will implement a cap / floor to ensure a projection in line with the approach.
244. The CSV\_P&L items ‘impact of one-off adjustments’ are memorandum items, which means that the relevant P&L items shall be reported in the CSV\_P&L template net of any potential one-off adjustments submitted and accepted.
245. Should banks wish to make one-off submissions, they must submit a preliminary version of CSV\_ONEOFF to the relevant CA in advance of the first full data submission and on a date specified by the relevant CA. In the case where the full magnitude of the one-off event is unknown at the time of the preliminary submission, an estimate of the event's magnitude should be provided in the preliminary submission, and the final numbers provided in the first full data submission. Notification of the estimated nature of the magnitude of a preliminary one-off submission should be made in the “Short description” column.
246. While in general the definitions of the Methodological Note apply, specific definitions to be highlighted for the use of this template comprise:
- ‘P&L item affected’ in ColNum 2 refers to the items in scope for which the P&L template includes an adjustment in the projections;
  - ‘(+/-) Total impact recognized (bps)’ in ColNum 14 and ColNum 15 refers to the cumulative projected impact in bps under baseline and adverse scenario;
  - ‘(+/-) Impact recognized in CSV\_P&L (mln EUR) before FX adjustments’ refers to the projected impact in mln EUR amount;
  - The reference date of the one-off event has to be in the year 2024; the Total Risk Exposure Amount is linked with the one provided under the item B in the CSV\_CAP template for the year 2024 (including the adjustments due to IFRS 9 transitional arrangements). The specific row of the CSV\_CAP template needs to be filled in order to obtain the impact of the one-off events submitted.



## 2.6.4 CSV\_CAP

247. This template shows the impact of the stress test on own funds and contains the calculation logic of the stressed capital ratios. The template columns include the 2024 figures, some restated figures as of 31 December 2024 under CRR3, and projected stressed capital components according to transitional adjustments and as fully loaded. Furthermore, for the purposes of the calculation of IFRS 9 transitional arrangements according to Article 473a of the CRR (including amendments to the regulation in response to the COVID-19 pandemic), ColNum 1 of the template includes the first implementation impact of IFRS 9 on capital, being subject to transitional arrangements.
248. Rows show instead the different components of own funds and the figures needed for the capital ratio calculations. The columns show the scenario and year as well as references to the respective positions in COREP and articles in the CRR.
249. Wherever possible, field definitions follow the logic laid down in COREP. In this case, COREP references (and even the computation logic) can be found in the column 'COREP CODE / COMPUTATION'. Moreover, references to the CRR can be found in the column 'Regulation'.
250. Banks making use of IFRS 9 transitional arrangements will have to follow some detailed steps and be subject to the following definitions. Note that due to the expiration of the IFRS 9 transitional arrangements, no projection values are requested:
- As a first step, all banks are required to fill in the selection at the top of the template to specify whether they are making use of transitional arrangements and which type. Banks doing so are assumed to have followed paragraph 9 of Article 473a of the CRR (amended by Regulation 2020/73) and have informed the competent authority of their decision. In line with the Methodological Note, only decisions taken and approved by 31 December 2024 can be reflected in the template. The selection also allows the banks making use of this discretionary approach to state whether they decided not to:
    - apply paragraph 4 of Article 473a of the CRR (and hence according to paragraph 9 of the same Article set the item in cell A.1.21.2, A.1.21.4 and A.1.21.4.1 equal to 0).
    - apply paragraph 2 of Article 473a of the CRR (and hence according to paragraph 9 of the same Article set the item in cell A.1.21.1 equal to 0)

The calculation of the transitional arrangements will be blocked for those banks reporting a 'No' answer or not selecting any option,<sup>28</sup>

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<sup>28</sup> This also means that all banks reporting a 'No' answer or not selecting any option are requested not to report any value under rows A.1.21.2 to A.1.21.4.1 and all other items relative to IFRS 9 transitional arrangements.

- The negative item ‘Amount subject to transitional arrangements’ is defined as the sum of the three types of increases in ECL accounted during the transitional period (as described in the next paragraphs) and net of taxes. The cells relevant to the amounts to be transitioned shall be filled by the banks and are not sourced from any other template;
- The positive item ‘Increase in IFRS 9 ECL provisions net of EL as of 01/01/2018 compared to related IAS 39 figures as at 31/12/17’ (“static part”) is included to only take into account the increase in IFRS 9 ECL provisions coming from the IFRS 9 introduction in 01/01/2018, which are subject to transitional arrangements. This captures the static leg of the amount subject to the transitional arrangements, which is reported gross of taxes and stays constant from the first IFRS 9 implementation (as of 01/01/2018) throughout the years of the scenario. The corresponding item as defined in paragraph 1(a) and (b) of Article 473a of the CRR would be the sum of  $A_{2,SA} + A_{2,IRB}$ ;
- The positive item ‘Increase in non-credit-impaired IFRS 9 ECL provisions net of EL compared to related IFRS 9 figures between 01/01/2018 and 31/12/2019’ (“old dynamic part”) captures the old dynamic leg of the amount subject to transitional provisions, which is reported gross of taxes and stay constant throughout the years of the scenario. The corresponding item as defined in paragraph 1(a) and (b) of Article 473a of the CRR would be the sum of  $A_{Old,SA} + A_{Old,IRB}$ ;
- The positive item ‘Increase in non-credit-impaired IFRS 9 ECL provisions net of EL compared to related IFRS 9 figures as at 01/01/2020’ (“new dynamic part”) captures the new dynamic leg of the amount subject to transitional provisions, which is reported gross of taxes in a cumulative way during the years of the scenario. The corresponding item as defined in paragraph 1(a) and (b) of Article 473a of the CRR would be the sum of  $A_{4,SA} + A_{4,IRB}$ ;
- The last components of the amount to be transitioned are the positive items ‘Increase of CET1 capital due to the tax deductibility of the amounts above’ (“static part” + “old dynamic part”) and ‘Increase of CET1 capital due to the tax deductibility of the amounts above (“new dynamic part”)’, which capture the tax effect of the items above<sup>29</sup>. These items are deducted in the calculation of the net amount to be transitioned;
- The positive item ‘Adjustments due to IFRS 9 transitional arrangements’ in CET1 (A.1.22.1) is calculated as the sum of two components: the first (A.1.22.1.1) applies the prescribed factors to the increase in ECL provisions singled out above (‘From the increased IFRS 9 ECL provisions net of EL’); the second (A.1.22.1.2) takes into account the positive offsetting effect that the transitional amounts included in CET1 have on the DTAs deducted because

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<sup>29</sup> The variable t does not address tax effects in the context of deferred tax assets (EBA Q&A 2018\_4113).

of increased ECL provisions ('From the amount of DTAs that is deducted from CET1 capital' – see paragraph 7(a) of Article 473a of the CRR). The former is included as a formula with the regulatory factors as laid down in the paragraph 6 of Article 473a of the CRR (amended by Regulation 2020/873). The latter is included as an input cell;

- IFRS 9 transitional arrangements effects on additional own funds are also foreseen for the items 'AT1 instruments' and 'Tier 2 capital instruments', along with 'Total risk exposure amounts' by following the disclosure approach in COREP v. 2.10.

251. For the purpose of showing fully loaded capital ratios, an approximate calculation of fully loaded capital ratios is implemented in the template. All CET1 transitional adjustments (including adjustments due to IFRS 9 transitional arrangements according to paragraph 8 of Article 473a of the CRR) are excluded from the calculation of the fully loaded Common Equity Tier 1 Capital ratio.
252. Excess deductions should be reported according to COREP under item A.1.13 to allow a correct calculation of the Transitional CET1.
253. Most capital instruments and deductions to the own funds figures, along with deferred tax assets (DTAs) and defined benefit pension plan assets or IFRS 9 impact on capital (and relevant transitional arrangements), should be filled in by the banks and treated as described in the respective sections of the Methodological Note.<sup>30</sup>
254. As seen in the previous sections of this Guidance, some of the items of the CSV\_CAP template are automatically sourced from other templates. These include the change in retained earnings sourced from CSV\_P&L ('Attributable to owners of the parent net of estimated dividends'), the IRB shortfall from CSV\_CR\_REA\_IRB, accumulated other comprehensive income arising from full revaluation, cash flow hedge and liquidity reserves from CSV\_MR\_SUM and the total REA from CSV\_REA\_SUM.
255. Some of the items in the CSV\_CAP template are to be kept constant in the projections according to the Methodological Note. This will also be the case for leverage ratio exposures, which are reported in the template net of credit risk adjustments.
256. The information on own funds and capital ratios is linked via formula from this template to the TRA\_CAP template.

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<sup>30</sup> The projected impact of the stress scenario on OCI and pension assets, however, should be reported by all banks as a memorandum item on the market risk summary template (CSV\_MR\_SUM)

## Memorandum items

257. The last rows of the CSV\_CAP template include memorandum items that inform on various matters of the bank's capital situation. These items include information on the (I) stock of DTAs and DTLs held by the bank, (II) details on the Defined Benefit Pension Schemes and (III) information on the bank's capital requirements (including individual thresholds on both a CET1 and a Total Capital perspective).

- Stocks of gross DTAs and DTLs are reported as memo items. Formulas in the template are implemented to ensure that the amount of DTAs that do not rely on future profitability and the amount of non-deductible DTLs are kept constant at the starting point. The total amount of DTLs shall also be kept constant, with changes allowed only for the allocation with the associated DTAs. A split for DTAs that rely on future profitability created before or after 1<sup>st</sup> January 2014 is included to account for the treatment of Article 478(2) of CRR related to transitional adjustments. As a general rule, the deduction in item A.1.9 '(-) DTAs that rely on future profitability and do not arise from temporary differences net of associated DTLs' should be equal (with opposite sign) to item J 'Deferred tax assets that rely on future profitability and do not arise from temporary differences' net of item L.2.1 'Of which: Deductible deferred tax liabilities associated with deferred tax assets that rely on future profitability and do not arise from temporary differences'.<sup>31</sup> In item J.3 'Memo item: amount of loss carryforwards associated to the DTAs that rely on future profitability and do not arise from temporary differences' banks are asked to report information on the amount of loss carryforwards that are associated with the stock of DTAs, especially considering that the methodology asks not to re-calculate the previous stock with the simplified 30% tax rate (see the respective section on CSV\_P&L on how to calculate DTAs in the template).<sup>32</sup>
- The requirement to report information on defined benefit pension assets is made to facilitate quality assurance and it follows Article 36 (e) and Article 41 of the CRR. The net amount of defined benefit pension assets is reported after the application of the OCI impact. As no impact is assumed for the baseline scenario, for all years such amount should be equal to the one reported for 2024. For the years 2026 and 2027 of the adverse scenario, this shall instead be set equal to the 2025 value (after the application of the OCI impact). For banks with a single defined benefit pension plan, item M and A.1.11 of CSV\_CAP should contain the same figures in absolute terms (but opposite sign), unless item M is negative, in which case A.1.11 is zero. The reporting of Item A.1.11 should correspond to COREP (C 01.00, r0390, c010). The item "Gross defined benefit pension

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<sup>31</sup> For banks that are allowed to apply such netting according to Article 38 CRR.

<sup>32</sup> For more information on how DTAs and loss carryforwards are created and used, please see the section related to CSV\_P&L.

fund assets" (M.1 in CSV\_CAP) refers to the amount of defined benefit pension fund assets before being reduced by the amount of obligations under the same fund or plan according to article 4(109) of the CRR. These obligations have to be reported in item M.2. Item M should correspond to item M.1 – item M.2 – item M.3 – item M.4 according to the regulation. Therefore, item M may return a negative value in some cases. The difference between M.1 and M.2 should correspond to COREP item CA1 1.1.1.14.1 (C 01.00, r0400, c0010).

- The information on the bank's capital requirements is included in the last rows of the CSV\_CAP template. The wording 'Transitional combined buffer requirements (%)' requires banks to report the buffers as they would be applicable in the relevant year of the stress test, i.e. it refers to any phasing-in that may be applied by the CA for example in the application of O-SII buffers.
- Where the calculation of a buffer depends on the country of location of an exposure, banks must provide in their explanatory note the details of how the buffer is constructed, including the aggregate relevant exposures in euro millions by country.

258. Most memorandum items are also shown in TRA\_CAP, including all rows related to banks' capital requirements.

### 2.6.5 CSV\_P&L

259. This template contains the calculation of the stressed P&L items and contains the calculation logic for the amount attributable to owners of the parent net of estimated dividends. In this template banks should report their actual and projected stressed P&L items, following the structure of the FINREP 02.00 template.<sup>33</sup> Therefore, references to the respective rows in this FINREP template can be found in the template. Furthermore, banks should report 5 years of historical dividend pay-outs as required by section 6.4.3 of the Methodological Note.

260. The methodology requires banks to use their own methodologies in projecting non-interest income and expense paths for the baseline and adverse scenarios. Banks should report in the explanatory note the assumptions taken as basis for the use of the internal models/methodologies in CSV\_P&L, which shall be coherent with the macroeconomic scenario, the general assumptions of the methodology (e.g. the balance sheet assumption) and the constraints listed in this section.

261. While in general the definitions of the Methodological Note apply, it has to be pointed out that losses and expenses throughout this template have to be reported as negative

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<sup>33</sup> Except Total assets which should be sourced from the FINREP template 01.01 row 380.

amounts. ‘Amount of dividends paid (before consideration of MDA restrictions)’ shall be reported as positive amounts. Moreover, ‘Amount of dividends paid (before consideration of MDA restrictions)’ shall include all voluntary reductions in the capital base distributed to owners of the consolidating entity, which are not already included in accordance with their accounting policy (in line with paragraph 519 of the Methodological Note).

262. The majority of P&L positions are sourced from other templates. As such:

- NII information is sourced from CSV\_NII\_SUM;
- ‘Dividend income’, ‘Net fee and commission income’ and ‘Share of the profit or (-) loss of investments in subsidiaries, joint ventures and associates accounted for using the equity method’ from CSV\_NFCI\_DIV;
- ‘Gains or losses on financial assets and liabilities held for trading and trading financial assets and trading financial liabilities’ from CSV\_MR\_PROJ (which sources its components from CSV\_MR\_SUM) and CSV\_MR\_SUM directly;
- ‘Gains or losses on non-trading financial assets mandatorily at fair value through profit or loss and Gains or losses on financial assets and liabilities designated at fair value through profit or loss’ and ‘Gains or losses from hedge accounting’ from CSV\_MR\_SUM;
- The impact of one-off effects as memorandum items on ‘Remaining other operating expenses’, ‘Other remaining administrative expenses’ (under the baseline scenario), ‘Depreciation’, ‘Cash contributions to resolution funds and deposit guarantee schemes’ and ‘Other provisions or reversal of provisions’ from CSV\_ONEOFF (as memo items);
- ‘Gains and losses arising from Operational Risk’ from CSV\_OR\_GEN;
- MDA related information from CSV\_MDA and from CSV\_LR\_MDA;
- Sub-item ‘Financial assets at amortised costs’ of ‘Impairment or (-) reversal of impairment on financial assets not measured at fair value through profit or loss’ is sourced from CSV\_CR\_SUM and CSV\_CR\_SEC\_SUM.

263. The majority of the items that have to be provided by banks (and as such are not extracted from other templates) include ‘residual’ items such as ‘Other operating income’, ‘Other provisions or reversal of provisions’ (which also includes FINREP (F 02.00, row 450, col 010)), ‘Other income and expenses from continuing operations’, ‘Cash contributions to resolution funds and deposit guarantee schemes’.

264. The starting point of ‘Other remaining administrative expenses’ (that is computed based on CSV\_ORAE inputs) must not include any adjustment related to one-off effects. The projections of ‘Other remaining administrative expenses’ (RowNum 29, also calculated in CSV\_ORAE) shall not fall (in absolute terms) below the floor automatically calculated on RowNum 31 which includes FX effects and be netted of one-off adjustments (if any). RowNum 30 is sourced from CSV\_ONEOFF under the baseline scenario and shall be filled-in by the bank (taking into account FX effects) under the adverse scenario. The floor on RowNum 31 is a formula that sources from the CSV\_P&L template, the CSV\_ONEOFF template and the input sheet.
265. The item ‘Gains or (-) losses on derecognition of investments in subsidiaries, joint ventures and associates, net’ as reported in FINREP (F 02.00, row 0320, col 0010) is to be included under ‘Other income and (-) expenses from continuing operations’<sup>34</sup>; any cash contributions to resolution funds and deposit guarantee schemes (F 02, row 0385, col 0010) should be included under ‘Cash contributions to resolution funds and deposit guarantee schemes’.
266. For the year 2024, banks shall report in RowNum 46 (‘Impairment of financial assets - CCR losses’) the CCR losses that are normally reported within other lines in FINREP (e.g. under FINREP (F 02.00, row 0460, col 0010). CCR losses are in fact singled out in the P&L template, and excluded for the purpose of the stress test from rows such as RowNum 42 (‘Impairment or reversal of impairment on financial assets not measured at fair value through profit or loss’).
267. When reporting Impairments on non-financial assets, banks shall follow paragraph 545 of the Methodological Note. This means that while the depreciation of these assets should be reported under CSV\_P&L item ‘Depreciation’ (RowNum 34), other types of impairments related to these assets, produced by the application of the macroeconomic scenario, shall be

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<sup>34</sup> For nGAAP banks:

- The item ‘Gains or (-) losses on derecognition of investments in subsidiaries, joint ventures and associates, net’ as reported in FINREP 02.00 row 0320 is to be included under ‘Other income and (-) expenses from continuing operations’;
- The item ‘Gains or (-) losses on trading financial assets and liabilities, net’ as reported in FINREP 02.00 row 0285 should be reported under ‘Gains or (-) losses on financial assets and liabilities held for trading and trading financial assets and trading financial liabilities’;
- The item ‘Gains or (-) losses on non-trading financial assets and liabilities, net’ as reported in FINREP 02.00 row 0295 should be reported under ‘Gains or (-) losses on non-trading financial assets mandatorily at fair value through profit or loss and Gains or losses on financial assets and liabilities designated at fair value through profit or loss’;
- The item ‘Increases or (-) decreases of the fund for general banking risks, net’ as reported in FINREP 02.00 row 0455 should be reported under ‘Other income and (-) expenses from continuing operations’;
- The item ‘Extraordinary profit or (-) loss after tax’ as reported in FINREP 02.00 row 0632 should be reported under ‘Profit or (-) loss after tax from discontinued operations’.

included under CSV\_P&L item 'Impairment or reversal of impairment on non-financial assets' (RowNum 47).

268. Following the description provided in column R of RowNum 54, 'Impairment or reversal of impairment of investments in subsidiaries, joint ventures and associates' should be reported under 'Other income and expenses from continuing operations' and therefore excluded from the scope of paragraph 544 of the Methodological Note ('Other impairments on financial assets').

269. The amount attributable to owners of the parent net of estimated dividends is calculated by the CSV\_P&L template and linked via formula from this template to the CSV\_CAP templates to obtain the total retained earnings for the year. Furthermore, the TRA\_P&L template sources most of its information from the CSV\_P&L template.

### Taxation in CSV\_P&L

270. With the exception of the starting year of the exercise, the current taxes are automatically calculated from the taxable profit by taking the prescribed 30% tax rate.

271. In line with the methodology, the taxable profit is floored at 0 and reported net of any loss carryforward used. For the calculation of the taxable profit, items stemming from NFCI template such as "Share of the profit or (-) loss of investments in subsidiaries, joint ventures and associates accounted for using the equity method" and "Dividend income" are reported according to FINREP and included in the taxable profit even if those items are reported after the taxes paid by the entity in FINREP (if the bank follows this approach). However, if the bank follows the latter approach, the taxable profit shall include "Share of the profit or (-) loss of investments in subsidiaries, joint ventures and associates accounted for using the equity method" and "Dividend income" with an adjusted contribution to make the applied implied tax rate equal to the 30%. This contribution adjustment would be done to ensure a level playing field with banks who report these positions gross of taxes and would therefore be subject to the 30% taxation as defined in section 6.4.4 of the methodological note.

272. The adjusted taxable profit contribution (RowNum 60 of the CSV\_P&L template) for the types of income described in the previous paragraph would be calculated in the following way:

- $(30\% - \text{tax rate applied by the bank}) / 30\% * [\text{sum of "Share of the profit or (-) loss of investments in subsidiaries, joint ventures and associates accounted for using the equity method" and "Dividend income" gross of taxes at parent level}]$ .
- The "tax rate applied by the bank" used for this calculation should always reflect the total tax applied to the "Share of the profit or (-) loss of investments in subsidiaries, joint ventures and associates accounted for using the equity method" and "Dividend income"



leading to the reported net figures in FINREP, i.e. taxes paid on subsidiaries, joint ventures and associates.

- The bank should explain the calculation of this adjustment item including the tax rates applied in the explanatory note.

273. The creation and use of DTAs follow a common approach that is defined in section 6.4.4. of the Methodological Note. Banks should provide an explanation of their approach when calculating tax income/expenses for the stress test in their explanatory note, including a reconciliation of the effective tax rate with the 30% common tax rate for each year of the stress test horizon. An example for the use of DTAs that rely on future profitability and do not arise from temporary differences is provided in the Table below.

Table 6: Example DTA calculation (not arising from temporary differences)

#	Item	2024	2025	2026	2027	Calculation	Reference to template
1	Profit before taxes	1,000	-1,000	2,000	5,000		RowNum 59 CSV_P&L
2	Floored at 0	1,000	0	2,000	5,000	MAX [(1);0]	
3	Loss carryforwards used <sup>35</sup>	0	0	2,000	333	See (18),(19),(20) of precedent year	
4	Of which: related to DTAs created during stress test			1,000	0		
5	Of which: related to DTAs existing at 31/12/2024			1,000	333		
6	Taxable profit (floored at 0 and net of loss carryforwards used)	1,000	0	0	4,667	(2) - (3)	RowNum 60 CSV_P&L
7	Current taxes	-150	0	0	-1,400	- (6)*(14)	RowNum 61 CSV_P&L
8	(+) DTAs created during current year of stress test		300	0	0	- MIN [(1)*(14);0]	RowNum 62 CSV_P&L
9	(-) DTAs used during current year of stress test			-450	-50		RowNum 63 CSV_P&L
10	Of which: created during stress test		0	-300	0	- (4)*(14)	
11	Of which: existing at 31/12/2024		0	-150	-50	- (5)*(14) <sub>2024</sub>	
12	Tax expense/income	-150	300	-450	-1,450	(7) + (8) + (9)	RowNum 64 CSV_P&L
13	Effective tax rate	15.0%	30.0%	22.5%	29.0%	- [(1) / (12)]	
<b>Additional information / memorandum items</b>							
14	Tax rate <sup>36</sup>	15.0%	30.0%	30.0%	30.0%		
15	DTA stock	200	500	50	0		
16	Of which: DTA stock — existing at 31/12/2024	200	200	50	0		

<sup>35</sup> Loss carryforwards existing as of 31 December 2024 can be used in accordance with applicable tax legislation. According to the methodology, the use of loss carryforwards in a given profitable year shall be applied by giving priority to DTAs created during the stress test over DTAs existing as of 31 December 2024.

<sup>36</sup> Example of bank's rate for year 2024 and simplified tax rate for projection years.

#	Item	2024	2025	2026	2027	Calculation	Reference to template
17	Of which: DTA stock — created during ST		300	0	0		
18	Total associated loss carryforwards	1,333	2,333	333	0		
19	Of which: related to DTAs existing at 31/12/2024	1,333	1,333	333	0	(16) / (14) <sub>2024</sub>	
20	Of which: related to DTAs created during stress test		1,000	0	0	(17) / (14)	

274. Banks shall also provide full transparency on the deferred tax relying on future profitability and arising from temporary differences in their explanatory notes, detailing how the figures reported in the template were determined. An example is provided in the Table below, which includes the details for the calculation of the amount of DTAs to be risk-weighted or deducted, according to Article 48 of the CRR.

Table 7: Example DTA calculation (arising from temporary differences)<sup>37</sup>

#	Item	Starting point	Y1	Calculation	Reference in templates
1	Tax rate	30.0%	30.0%		
2	Accumulated OCI — existing at 31/12/2024	-6			
3	Change in OCI — created during ST (gross of taxes)		-30		
4	Total Accumulated OCI (after taxes)		-27	(2)+(3)*[1-(1)]	RowNum 7 CSV_CAP
5	(+) DTAs that rely on future profitability and arise from temporary differences — created during ST		9	- MIN [(3)*(1);0]	
6	Starting stock of DTAs that rely on future profitability and arise from temporary differences	1			
7	Total stock of DTAs that rely on future profitability and arise from temporary differences	1	10	(5) + (6)	RowNum 101 CSV_CAP

<sup>37</sup> The following example only covers a one year horizon and may only be applied to the case in which the stock of DTAs relying on future profitability and arising from temporary differences at the starting point is positive assuming that the change in OCI is negative. Banks having a stock of DTLs (that is, a negative net stock of DTAs provided that the conditions for netting under Article 38 of the CRR are met) shall instead adjust the calculation in the appropriate lines of the Table to prevent an incorrect distribution of amounts to be risk-weighted and/or deducted. In the case where there is an OCI gain and "DTAs relying on future profitability and arising from temporary differences" can partially or totally offset the impact of taxation, banks should reduce the stock of "DTAs relying on future profitability and arising from temporary differences" and in turn the deduction of these DTAs in item A.1.16 of template CSV\_CAP ("(-) Deductible DTAs that rely on future profitability and arise from temporary differences") having regard for the 10%/17.65% thresholds of article 48 of the CRR.

#	Item	Starting point	Y1	Calculation	Reference in templates
8	CET1 for threshold calculation — starting point <sup>38</sup>	101		Example	
9	10%*CET1 threshold	10.1		[(8)*10%]	RowNum 113 CSV_CAP
10	CET1 for threshold calculation — during ST		80	[(8)-(2)+(4)]	
11	10%*CET1 threshold		8	[(10)*10%]	RowNum 113 CSV_CAP
12	DTAs that rely on future profitability and arise from temporary differences to be risk-weighted		8	MIN (7;11)	RowNum 16 CSV_REA_SUM
13	DTAs that rely on future profitability and arise from temporary differences to be deducted		2	MAX [(7)-(12);0]	RowNum 30 CSV_CAP
14	REAs — existing at 31/12/2024	700		Example	
15	REAs — during ST <sup>39</sup>		720	[(14)+(12)*250%]	

### 2.6.6 CSV\_MDA

275. This template contains the calculation of the risk-based Maximum Distributable Amount (MDA). Banks are expected to complete this template after having filled in the templates CSV\_P&L and CSV\_CAP.
276. While in general definitions of the Methodological Note apply, whenever specific CRR definitions apply to fields that have to be populated by banks, references to the respective Articles of the CRR can be found in column 'REGULATION' of the template.
277. The rows contain different components of the risk-based MDA calculation. The columns show scenarios and years as well as references to the P&L and capital items and a link to the respective paragraphs in CRR and CRD.
278. CSV\_MDA sources REA and capital figures from CSV\_REA\_SUM and CSV\_CAP, respectively.
279. RowNum from 1 to 17 are automatic except for RowNum 13 which has to be filled in by all banks and should reflect year-end CET1 capital after distributions are made, and prior to any (risk-based or LR) MDA-adjustment to dividends paid, AT1 payments, variable

<sup>38</sup> Illustrative example. As amount of capital for threshold calculation, banks should take the CET1 that is reported in the year of the calculation of such threshold, i.e. including other changes in CET1 through the projection years and according to article 48 of the CRR.

<sup>39</sup> Assuming no other adjustment in REAs coming from the stress test exercise.

compensation or discretionary pension benefits (if applicable). For any year t, RowNum 13 is expected to be equal to CSV\_CAP RowNum 3 in year t prior to populating any other cells in CSV\_MDA and CSV\_LR\_MDA. Any deviation should be explained by the bank in its Explanatory Note.

280. RowNum 18 to 23 should include starting point and projected distribution amounts (if any) before consideration of any potential restrictions, i.e. as reported in CSV\_P&L (or, in exceptional cases, in CSV\_CAP), but with a positive sign. These rows must be reported whether the risk-based MDA trigger point is breached or not. Column “Reported in the following item” and “Second item affected” refer to the P&L or, in exceptional cases, Capital<sup>40</sup> item(s) where the respective distribution is reported, the applicable items need to be chosen from the drop-down menus provided in the columns whenever the corresponding line is populated. The lines should be populated as follows:

- RowNum 18 should include dividend payments after tax (if any);
- RowNum 19 should only include share buy-backs in 2024 (if any);
- RowNum 20 should include pre-tax payments of AT1 instruments if they are included in pre-tax profit (in which case banks shall document and justify in the explanatory note), post-tax payments of AT1 instruments otherwise (if any);
- RowNum 21 should include variable remuneration pre-tax (if any);
- RowNum 22 should include discretionary pension benefits pre-tax (if any).
- RowNum 23 is automatically calculated and should include the sum of the five items above;

281. The remaining rows of CSV\_MDA must be populated only for those years when the risk-based MDA trigger point described under section 6.4.3 of the Methodological Note is breached (i.e. when RowNum 17 delivers “Yes”) such that the bank in these cases complies with the reduction in distributions prescribed by the regulation. Banks not reporting any breach in the trigger should not complete any other row of CSV\_MDA.

282. If the risk-based MDA trigger is breached, banks have to also populate RowNum 36-37 and from 39 to 48 as follows:

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<sup>40</sup> The drop-down lists in CSV\_CAP also include some items of CSV\_CAP for the cases in which the bank reports AT1 coupons under Reserves.

- RowNum 36 is calculated as:  $\text{Max}(\text{Accounting P\&L before tax}^{41} + \text{variable remuneration} + \text{discretionary pension benefits} + \text{AT1 coupon payments (if included in pre-tax profit), 0})$ ;
- RowNum 37 should be equal to  $\text{RowNum 36} * 0.3^{42}$ ;
- RowNum 39 to 43 should include adjustments on distributions for the pre-tax items already listed in RowNum 18 to 22; any reduction shall be reported as a positive value; column “Reported in the following item” and “Second item affected” refer to the respective P&L or capital item where the distribution is reported, the applicable items need to be chosen from the drop-down menus provided in the columns whenever the corresponding line is populated;
- RowNum 44 to 48 should include adjustments on distributions for the post-tax items already listed in RowNum 18 to 22; any reduction shall be reported as a positive value; column “Reported in the following item” and “Second P&L item affected” refer to the respective item where the distribution is reported, the applicable items need to be chosen from the drop-down menus provided in the columns whenever the corresponding line is populated;

283. RowNum 49 to 51 are automatically calculated and are linked to CSV\_P&L, so that the P&L is automatically adjusted without any additional action needed from the bank.<sup>43</sup>

284. RowNum 52 is included to make a final check on any breach that is still made by the bank with respect to the risk-based MDA trigger. If a bank were in breach when reporting RowNum 13, then RowNum 52 is expected to return a negative value only if the calculated risk-based MDA = 0, which means the bank is still in breach even after having reduced all its distributions to zero.

### 2.6.7 CSV\_LR\_MDA

285. This template contains the continuation of the calculation of the Leverage Ratio (LR) Maximum Distributable Amount (MDA) according to Articles 141b and 141c of the CRD, taking into account the leverage ratio requirements for G-SIIs. G-SIIs are expected to complete this template after having filled in the template CSV\_MDA. All other banks shall leave this template empty.

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<sup>41</sup> Notice that this amount should correspond to RowNum 59 of CSV\_P&L before any restriction in CSV\_MDA or CSV\_LR\_MDA is made (i.e. if RowNum 58 of CSV\_P&L is equal to 0).

<sup>42</sup> Any deviation has to be justified in the Explanatory Note.

<sup>43</sup> This means that banks will not be required to manually adjust their distributions in the respective lines of CSV\_P&L.

286. While in general the definitions of the Methodological Note apply, whenever specific CRR/CRD definitions apply to fields that have to be populated by banks, references to the respective Articles of the CRR/CRD can be found in column 'REGULATION' of the template.
287. The rows contain different components of the LR MDA calculation. The columns show scenarios and years as well as references to the P&L items and a link to the respective paragraphs in CRR and CRD.
288. CSV\_LR\_MDA sources distribution amounts and capital figures from CSV\_MDA and CSV\_CAP, respectively.
289. RowNum from 1 to 12 are automatically filled except for RowNum 8 which should reflect year-end T1 capital after distributions are made, and prior to any (risk-based or LR) MDA-adjustment to dividends paid, AT1 payments or variable compensation (if applicable). For any year t, RowNum 8 is expected to be equal to CSV\_CAP RowNum 57 in year t prior to populating any other cells in CSV\_MDA and CSV\_LR\_MDA. Any deviation should be explained by the bank in its Explanatory Note.
290. The remaining rows of CSV\_LR\_MDA have to be populated only for those years when the trigger point described under section 6.4.3 of the Methodological Note is breached (i.e. when RowNum 12 delivers "Yes") such that the bank in these cases complies with the reduction in distributions prescribed by the regulation. Banks not reporting any breach in the trigger should not complete any other row of CSV\_LR\_MDA.
291. RowNum 13 to 17 are automatically linked to CSV\_MDA and should include starting point and projected distribution amounts (if any) before consideration of any potential restrictions, i.e. as reported in CSV\_P&L (or, in exceptional cases, in CSV\_CAP), but with a positive sign. Column "Reported in the following item" and "Second item affected" refer to the P&L or, in exceptional cases, Capital<sup>44</sup> item(s) where the respective distribution is reported. The lines should present the following:
- RowNum 13 should include dividend payments after tax (if any);
  - RowNum 14 should only include share buy-backs in 2024 (if any);
  - RowNum 15 should include pre-tax payments of AT1 instruments if they are included in pre-tax profit (in which case banks shall document and justify in the explanatory note), post-tax payments of AT1 instruments otherwise (if any);

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<sup>44</sup> The drop-down lists in CSV\_CAP also include some items of CSV\_CAP for the cases in which the bank reports AT1 coupons under Reserves.

- RowNum 16 should include variable remuneration pre-tax (if any);
  - RowNum 17 should include discretionary pension benefits pre-tax (if any).
292. RowNum 18 is automatically calculated and should include the sum of the five items.
293. If the LR MDA trigger is breached, banks have to also populate RowNum 31-32, 35-39 and 40-44 as follows:
- RowNum 31 is calculated as:  $\text{Max}(\text{Accounting P\&L before tax}^{45} + \text{variable remuneration} + \text{discretionary pension benefits} + \text{AT1 coupon payments (if included in pre-tax profit)}, 0)$ ;
  - RowNum 32 should be equal to  $\text{RowNum 31} * 0.3^{46}$ ;
  - RowNum 35 to 39 should include adjustments on distributions for the pre-tax items already listed in RowNum 13 to 17; any reduction shall be reported as a positive value; column “Reported in the following item” and “Second item affected” refer to the respective item where the distribution is reported;
  - RowNum 40 to 44 should include adjustments on distributions for the post-tax items already listed in RowNum 13 to 17; any reduction shall be reported as a positive value; column “Reported in the following item” and “Second item affected” refer to the respective item where the distribution is reported;
294. For stress testing purposes and template mechanics, the adjustments to be included in RowNum 35 to 44 of CSV\_LR\_MDA shall be residual to the ones driven by the risk-based MDA (if any) and of the amount automatically calculated in RowNum 34.
295. RowNum 45 to 50 are automatically calculated. RowNum 45 to 47 are linked to CSV\_P&L, so that the P&L is automatically adjusted without any additional action needed from the bank.<sup>47</sup> Considering that, according to section 6.4.3 of the methodological note, banks are requested to distribute exactly (i) the risk-based MDA in years of the scenario where only the risk-based MDA trigger is breached, (ii) the LR MDA in years of the scenario where only the LR MDA trigger is breached, (iii) the minimum of the risk-based MDA and the LR MDA in years of the scenario where both the risk-based MDA trigger and the LR MDA trigger are breached, RowNum 48 in CSV\_LR\_MDA shall be equal to (i) RowNum 38 of CSV\_MDA in years of the scenario where only the risk-based MDA trigger is breached, (ii) RowNum 33 of CSV\_LR\_MDA

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<sup>45</sup> Notice that this amount should correspond to RowNum 59 in CSV\_P&L before any restriction in CSV\_MDA and CSV\_LR\_MDA is made (i.e. if RowNum 58 in CSV\_P&L is equal to 0).

<sup>46</sup> Any deviation has to be justified in the Explanatory Note.

<sup>47</sup> This means that banks will not be required to manually adjust their distributions in the respective lines of CSV\_P&L.

in years of the scenario where only the LR MDA trigger is breached, (iii) the minimum of RowNum 38 of CSV\_MDA and RowNum 33 of CSV\_LR\_MDA in years of the scenario where both the risk-based MDA trigger and the LR MDA trigger are breached. Banks are requested to justify in the Explanatory note any deviation.

296. RowNum 50 is included to make a final check on any breach that is still made by the bank with respect to the LR MDA trigger. If a bank was in breach when reporting RowNum 8, then RowNum 50 is expected to return a negative value only if the calculated LR MDA (as computed in RowNum 33) equals 0, which means the bank is still in breach even after having reduced all its distributions to zero.

### 2.6.8 CSV\_CAPMEAS

297. This template contains information on major capital measures and losses (if any) after the cut-off date as defined by section 1.3.8 of the Methodological Note. These capital measures will not have an impact on the stress test results but just serve for information purposes ('below the line').

298. The rows show the different CET1 / Additional Tier 1/ Tier 2 issuance and losses to be realised between 1 January 2025 and 31 March 2025. The columns show the capital impact in mln EUR. No other types of impact on capital ratio than the ones listed in the template will be included.

299. The row on realised fines/litigation costs (net of provisions) should indicate realised fines and litigation costs until the cut-off date of this template. Losses reported in this row should also be contained in the loss projections for conduct and other operational risk for 2024 (both baseline and adverse) in CSV\_OR\_GEN and/or CSV\_OR\_CON.

300. The information entered is linked via formula from this template to the TRA\_CAPMEAS template.

### 2.6.9 CSV\_ORAE

301. This template contains information on other remaining administrative expenses (ORAE).

302. The rows show the granular breakdown of expenses for the top 5 countries in terms of ORAE and (country) category "Other" as well as the total considering:

- RowNum 1 to 7 as "Total Other Remaining Admin Expenses" and calculated as the sum of "STAFF EXPENSES" and "OTHER ADMINISTRATIVE EXPENSES".
- RowNum 8 to 14, "STAFF EXPENSES" are calculated as the sum of "of which: fixed remuneration (staff expenses)" (RowNum 15 to 21), "of which: variable remuneration



(staff expenses)” (RowNum 22 to 28) and “Staff expenses other than remuneration” (RowNum 29 to 35)

- RowNum 36 to 42, “OTHER ADMINISTRATIVE EXPENSES” are calculated as the sum of:
  - i. “Information Technology expenses” (RowNum 43 to 49)
  - ii. a mix category on “Consulting and professional services, Advertising, marketing and communication, Litigation expenses not covered by provisions” (RowNum 50 to 56)
  - iii. “Real estate and Leasing expenses” (RowNum 57 to 63)
  - iv. “Other , excluding Expenses for conduct risk and Expenses for other operational risk” (RowNum 64 to 70) referring to FINREP categories “Taxes and duties (other)”, “Expenses related to credit risk” and “Other administrative expenses – Rest”

303. For the year 2024, banks shall report the expenses that are normally reported within FINREP (under F 16.08, F 44.04). References to FINREP data points and calculations are also provided.

## 2.7 Use of pro-forma data in the stress test

304. If the FINREP data are not available for historical years, banks may report pro-forma data. In particular, in case of major events having affected the scope of consolidation and/or the bank’s structure before the launch of the exercise, banks may be allowed to use pro-forma data to reflect in the caps and floors included in the methodological note these major events. This will be allowed only if the event is in line with the requirements included in the methodology and only after their approval.

305. As a general principle, the use of pro-forma data will be done in observance of the Commission Regulation No 809 2004 on prospectuses,<sup>48</sup> any related Commission update and the ESMA update on this Regulation,<sup>49</sup> especially in the identification of a “significant gross change”.

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<sup>48</sup> Commission Regulation No 809 2004 Implementing Directive 2003/71/EC of the European Parliament and of the Council as regards information contained in prospectuses as well as the format, incorporation by reference and publication of such prospectuses and dissemination of advertisements.

<sup>49</sup> ESMA update of the CESR recommendations on the consistent implementation of Commission Regulation (EC) No 809/2004 implementing the Prospectus Directive.

306. Banks would be allowed to use of pro-forma data only for a selected list of events that are listed in paragraph 17 of the Methodological Note and only if the significant event produces a variation above a set materiality threshold (in accordance with paragraph 16 of the Methodological Note). Note that, according to paragraph 16 of the Methodological Note, pro-forma data are to be used in case of sudden and significant events, which distort annual caps and floors in the EBA Stress Test Methodology for P&L items, but not for gradual changes stretched over multiple periods through implementation in steps or happening distantly<sup>50</sup>.
307. As a general approach, the relevant CA will propose to the EBA the list of cases that are believed to be in line with the scope of this section ahead of the first submission. Banks will be informed on the approved cases, so that the adjustment to the constraints can be included in their submissions.
308. According to the methodology, the stress test includes only a limited list of constraints (caps or floors) based on historical data, for which banks may be allowed to use pro-forma data. These banks are requested to report the pro-forma historical data in the specific risk-type CSV template (if any) where the constraint is generated, while they shall report in CSV\_P&L the historical data in line with their financial statements.<sup>51</sup>
309. Table 8 below includes a list of these constraints:

Table 8: List of constraints for which the bank may be allowed to use pro-forma data in case of major events affecting its business model

Section or topic	Constraint affected if significant event happens before 1/1/2025	Constraint affected if significant event happens on or after 1/1/2025	Relevant template
Credit risk	N/A	N/A	
Market risk	Cap on client revenues in the adverse scenario	Cap on client revenues in the adverse scenario	CSV_MR_PROJ and CSV_P&L
NII	N/A	Overall cap on NII	CSV_NII_SUM and CSV_P&L

<sup>50</sup> In case the event triggered exceptional expenses which fall in the scope of the one-off methodology (Section 6.4.2 of the Methodological Note), the pro-forma data must not be modified for any one-off adjustment. In case banks intend to submit in parallel a list of one-off adjustments regarding P&L items, they may do so in the CSV\_ONEOFF template. The one-off adjustments submitted may also refer to P&L items subject to pro-forma data. Furthermore, banks should provide an explanation (in the Explanatory Note as a separate section) on how the interaction of pro-forma data with one-off adjustments and the macroeconomic scenario has been taken into account.

<sup>51</sup> In this way, while the starting point in CSV\_P&L will include the “actual” historical data, the projections will include the adjusted constraint based on pro-forma.

Section or topic	Constraint affected if significant event happens before 1/1/2025	Constraint affected if significant event happens on or after 1/1/2025	Relevant template
Operational risk – conduct risk	Floor on projection of losses from material and non-material conduct risk events	Floor on projection of losses from material and non-material conduct risk events	CSV_OR_GEN and CSV_OR_CON and CSV_P&L
Operational risk – other operational risk	Floor on other operational risk losses	Floor on other operational risk losses	CSV_OR_GEN and CSV_OR_CON and CSV_P&L
Non-interest income, expenses and capital	N/A	Cap on dividend income, NFCI and share of the profit of investments	CSV_NFCI_DIV and CSV_P&L
Non-interest income, expenses and capital	N/A	Floor on remaining administrative expenses, remaining other operating expenses, cash contributions to resolution funds and deposit guarantee schemes (except for contributions to the Single resolution fund), depreciation and other provisions	CSV_P&L
Non-interest income, expenses and capital	N/A	Cap on other operating income	CSV_P&L
Non-interest income, expenses and capital	N/A	Dividends paid (if no dividend policy is available or documented)	CSV_P&L

310. After the approval, the institution would be allowed to report pro-forma figures, which will be used to adjust the relevant constraints based on historical/starting point information.

# Annex I: Market risk

Table 9: Balance sheet items at partial or full fair value and the reporting of their impact

Item		Reporting of impact					
		Statement of P&L (Template CSV_P&L)			Other comprehensive income (Template CSV_CAP)		
Balance sheet	IFRS 9 measurement type <sup>52</sup>	Hedging instruments/hedged item/other use <sup>53</sup>	Net trading income (gain or losses on held for trading items)	Gain or losses on other FVPL items	Gains or losses from hedge accounting	Other comprehensive income	Cash flow hedges (then accumulated in equity under the cash flow hedge reserve)
	Amortised cost/FVPL	(i) Fair value hedged item* or (ii) Portfolio Fair value hedged item of interest rate risk*	No	No	Yes, for the hedge risk only excluding FX	No	No
		(i) Cash flow hedged item* or (ii) Portfolio cash flow hedged item of interest rate risk*	No	No	No	Yes	No, but the hedging derivative related will have an impact on this column in a different line
<b>Asset</b>	FVOCI	(i) Collecting contractual cash flows & selling financial assets or (ii) Holding or selling equity position	No	No	No	Yes	No
	FVOCI/FVPL	(i) Fair value hedged item* or (ii) Portfolio Fair value hedged item of interest rate risk*	No	No	Yes, for the hedge risk only	Yes, for the unhedged risk <sup>54</sup>	No

<sup>52</sup> The measurement type is of the form 'measurement 1/measurement 2', with measurement 2 corresponding to either the hedged risk (for the hedged item) or the inefficient part (for the hedging instrument).

<sup>53</sup> In column 3, 'Hedging instruments/hedged item/other use', all items ending with an asterisk '\*' are hedge-accounting designations (under both IAS 39 and IFRS 9).

<sup>54</sup> When paragraph 6.5.8 of IFRS 9 applies (equity instruments designated at fair value through OCI).

Item		Reporting of impact					
		Statement of P&L (Template CSV_P&L)			Other comprehensive income (Template CSV_CAP)		
Balance sheet	IFRS 9 measurement 52 type	Hedging instruments/hedged item/other use 53	Net trading income (gain or losses on held for trading items)	Gain or losses on other FVPL items	Gains or losses from hedge accounting	Other comprehensive income	Cash flow hedges (then accumulated in equity under the cash flow hedge reserve)
	FVOCI/FVPL	(i) Cash flow hedging instrument * or (ii) Portfolio Cash flow hedging of interest rate risk*	No	No	Yes, ineffective part (either the part higher than the hedged item change in FV or the change in fair value related to another risk parameter)	No	Yes, but effective part only = that is lesser of (a) cumulative gain/loss on the hedging instrument from hedge inception; and (b) cumulative FV change in FV of the expected future CF on the hedged item
Net assets and liabilities	FVPL	(i) Fair value hedging instrument* or (ii) Portfolio Fair value hedging instrument of interest rate risk*	No	No	Yes	No	No
		Held with a trading intent and their related hedges	Yes	No	No	No	No
		Economic hedges excluding hedges of items held with a trading intent	Yes	No	No	No	No
		Mandatory or optional at FVPL	No	Yes	No	No	No
Liabilities	Amortised cost/FVPL	(i) Fair value hedged item* or (ii) Portfolio Fair value hedged item of interest rate risk*	No	No	Yes, for the hedged risk only excluding FX	No	No



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