

This version: 14 February 2025

# Frequently Asked Questions

## Reporting of registers of information under DORA

This document provides answers to the frequently asked questions (FAQ) about the preparation and the reporting of the registers of information of contractual arrangements with the ICT third-party providers that financial entities need to maintain in accordance with Article 28(3) of Regulation (EU) 2022/2554 (DORA) and as specified in the Commission Implementing Regulation (EU) 2024/2956 (ITS on the registers of information). The answers focus on the questions regarding the practical nature of the filling the templates as specified in the Commission Implementing Regulation (EU) 2024/2956, preparation of the reporting files, their submission to the ESAs.

The FAQ document does not provide responses to the questions regarding the interpretation of the relevant legal acts related to the registers of information, including the provisions of DORA and ITS on the registers of information – such questions are to be addressed through a formal Questions and Answers process established by the ESAs for handling the questions of such nature.

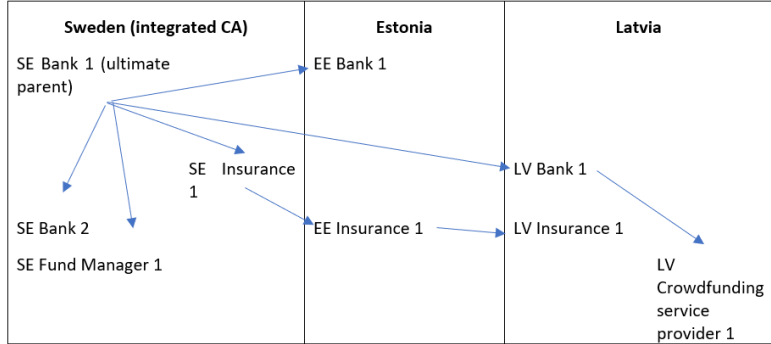
The answers to the questions are provided on ‘best efforts’ basis by the ESAs staff and therefore they do not represent any legal interpretation or guidance agreed with the competent authorities, nor do they represent official stance of the ESAs.

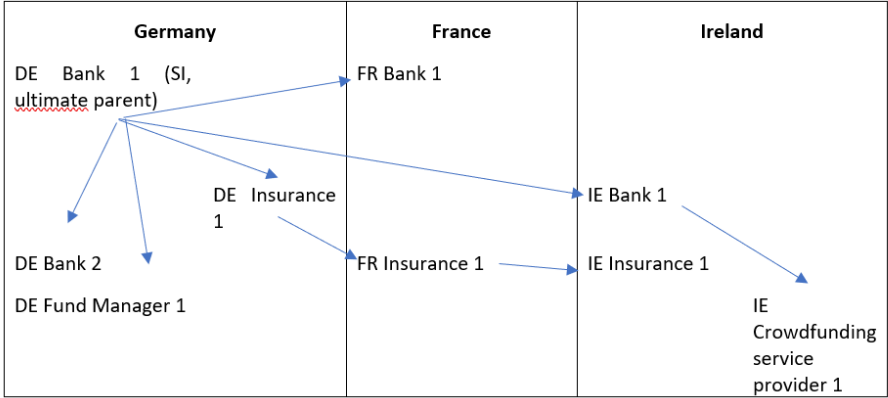
##	Category	Question	Answer
<b>DORA 2024 Dry Run exercise</b>			
1	2024 Dry Run exercise	What are the outcomes of the 2024 Dry Run exercise on the reporting of the registers of information?	To help financial entities develop their RoI in accordance with the requirements set out in the ITS on the Registers of Information and be ready to report these registers from 2025, the ESAs and the competent authorities have carried out a dry run exercise in 2024. It allowed for the testing of the reporting processes in an environment as close as possible to the official reporting process. Furthermore, the ESAs aimed at

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			<p>facilitating the early preparation of the competent authorities by onboarding them to the reporting channels that will be used for the official reporting from 2025 onwards. The exercise was carried out on a voluntary and ‘best effort’ basis.</p> <p>During the dry run exercise, 1039 participating financial entities have received direct data quality feedback on the registers of information they have provided to the ESAs. The overall findings from the dry run have been collated in the summary report published on 17 December 2024 (available <a href="#">here</a>). The materials from the Dry Run are available on the dedicated webpage <a href="#">Preparations for reporting of DORA registers of information   European Banking Authority</a></p>
2	Tools from the 2024 Dry run exercise	The ESAs made available several tools for the 2024 Dry Run exercise including Excel template and .xls to .csv conversion tool. Will these tools be updated and made available for the official reporting in 2025?	<p>The tools have been provided solely for the purposes of the dry run, as (1) they were based on the final report of the draft ITS on the registers of information, which was not the final version of the legislative act adopted by the EU commission, and they were (2) based on the draft data point model made available for the dry run exercise.</p> <p>The final data point model and technical specifications were made available to the competent authorities and financial entities in December 2024 following the finalisation and the adoption of the ITS on the registers of information to allow to set up reporting solutions to facilitate the official reporting without relying on the ad hoc tools provided for the dry run. To this end, as announced from the launch of the Dry Run exercise the ESAs did not plan to update and maintain the .CSV conversion tool for the official reporting as also no such tools are made available for any other types of prudential/supervisory reporting.</p>
<b>Reporting of the registers of information in 2025</b>			
3	Content of the reporting	What needs to be reported to the ESAs starting from 2025?	In accordance with the ESAs Decision concerning the reporting by the competent authorities of the information necessary for the designation of critical ICT-third party service providers (CTPPs) of 8 November (see <a href="#">ESA 2024 22</a> ) competent authorities need to report to the ESAs full registers of

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			<p>information as referred to in Article 28(3) of Regulation (EU) 2022/2554, to be requested from financial entities, covering the data points as specified in Annex I of the Commission Implementing Regulation (EU) 2024/2956.</p> <p>These registers need to be reported (1) at individual entity level, where financial entities are not part of a group of financial entities; (2) at individual entity level, where financial entities are part of a group of financial entities, and where the parent undertaking is an entity outside of the Union and there is no Union parent undertaking; and (3) at the highest level of consolidation in the Union for groups of financial entities that is available to the competent authorities in accordance with their supervisory responsibilities under the legal acts referred to in Article 46 of Regulation (EU) 2022/2554 (see also questions regarding consolidation below).</p>
4	Reporting group registers/ consolidation	According to DORA, the registers shall be kept at individual, sub-consolidated and consolidated level. How will this be reflected in the reporting to the ESAs?	<p>Whilst the competent authorities exercising their supervisory powers in accordance with DORA may request financial entities to provide registers at individual, sub-consolidated and consolidated level, for the purposes of reporting to the ESAs the following applies in accordance with the ESAs Decision concerning the reporting by the competent authorities of the information necessary for the designation of critical ICT-third party service providers (CTPPs) of 8 November (see <a href="#">ESA 2024 22</a>). The registers should be reported at:</p> <ul style="list-style-type: none"> <li>at individual entity level, where financial entities are not part of a group of financial entities (stand-alone financial entities);</li> <li>at individual entity level, where financial entities are part of a group of financial entities, and where the parent undertaking is an entity outside of the Union and there is no EU parent undertaking;</li> </ul>

##	Category	Question	Answer
			<ul style="list-style-type: none"> <li>at the highest level of consolidation in the EU for groups of financial entities that is available to the competent authorities in accordance with their supervisory responsibilities under the legal acts referred to in Article 46 of DORA.</li> </ul>
5	Reporting group registers/ consolidation	How to report to the ESAs registers for the groups of financial entities that span across different sectors and different Member States?	<p>The following data flows for the registers of groups of financial entities are assumed considering the scope of the responsibilities of various competent authorities under Article 46 of DORA:</p> <ul style="list-style-type: none"> <li>integrated competent authorities that are fully responsible for the supervision of all financial entities belonging to the same group (DORA group) report to the ESAs one complete RoI for the whole DORA group;</li> <li>sectoral competent authorities report to the ESAs aggregated/consolidated RoI for the entities under their supervisory remit at the highest EU level of consolidation with respect to DORA Groups available to them (e.g. highest prudential consolidation of a banking or insurance group). In case the prudential scope of consolidation would encompass entities from another financial sector (e.g. a fund manager in an insurance group), the register of information of this entity would be encompassed in the consolidated/sub-consolidated RoI of the group, so reported to the ESAs by the competent authority in charge of consolidated/sub-consolidated RoI, and would not be reported individually.</li> <li>sectoral competent authorities report to the ESAs individual or sub-consolidated RoI for the entities of the group, where parent undertaking is not subject to DORA requirements, or is outside of their supervisory remit.</li> </ul>

##	Category	Question	Answer
			<p><b>Example 1. Cross-border cross-sectoral group (DORA Group), where the prudential consolidating supervisor is an integrated CA</b></p>  <pre> graph TD     subgraph Sweden_integrated_CA [Sweden (integrated CA)]         SE_Bank_1[SE Bank 1 (ultimate parent)]         SE_Bank_2[SE Bank 2]         SE_FM[SE Fund Manager 1]         SE_Ins_1[SE Insurance 1]     end     subgraph Estonia         EE_Bank_1[EE Bank 1]         EE_Ins_1[EE Insurance 1]     end     subgraph Latvia         LV_Bank_1[LV Bank 1]         LV_Ins_1[LV Insurance 1]         LV_Crowd[LV Crowdfunding service provider 1]     end     SE_Bank_1 --&gt; EE_Bank_1     SE_Bank_1 --&gt; SE_Bank_2     SE_Bank_1 --&gt; SE_FM     SE_Bank_1 --&gt; SE_Ins_1     SE_Ins_1 --&gt; EE_Ins_1     SE_Ins_1 --&gt; LV_Bank_1     SE_Ins_1 --&gt; LV_Ins_1     EE_Ins_1 --&gt; LV_Ins_1     LV_Bank_1 --&gt; LV_Crowd     </pre> <ul style="list-style-type: none"> <li>SE CA being an integrated supervisor will provide to the EBA one consolidated/aggregate RoI requested from the SE Bank 1 as ultimate parent undertaking covering all FE entities of the DORA groups.</li> </ul>

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			<p><b>Example 2. Cross-border cross-sectoral group (DORA Group), which is headed by the SSM Significant Institution (SI)</b></p>  <pre> graph TD     subgraph Germany         DE_Bank_1["DE Bank 1 (SI, ultimate parent)"]         DE_Bank_2["DE Bank 2"]         DE_FM["DE Fund Manager 1"]         DE_Ins_1["DE Insurance 1"]     end     subgraph France         FR_Bank_1["FR Bank 1"]         FR_Ins_1["FR Insurance 1"]     end     subgraph Ireland         IE_Bank_1["IE Bank 1"]         IE_Ins_1["IE Insurance 1"]         IE_Crowd["IE Crowdfunding service provider 1"]     end     DE_Bank_1 --&gt; FR_Bank_1     DE_Bank_1 --&gt; IE_Bank_1     DE_Bank_1 --&gt; DE_Bank_2     DE_Bank_1 --&gt; DE_FM     DE_Ins_1 --&gt; FR_Ins_1     IE_Bank_1 --&gt; IE_Ins_1     IE_Ins_1 --&gt; IE_Crowd     </pre> <ul style="list-style-type: none"> <li>• ECB being a prudential supervisors of SI will provide to the ESAs group RoI from DE Bank 1 covering the prudential scope of consolidation, including DE Bank 2, FR Bank 1 and IE Bank 1. (DE Fund Manager 1 and IE Crowdfunding service provider 1 can be included, if they are included into the prudential scope of consolidation DE Bank 1 protection group)</li> <li>• DE CA responsible for supervision of insurance, will provide to the ESAs consolidated RoI collected form from DE Insurance 1 covering the insurance prudential group including FR Insurance 1 and IE insurance 1.</li> <li>• DE CA responsible for the supervision of DE Fund Manager 1 will provide to the ESAs individual RoI (in case that FE is not included into the prudential scope of consolidation of DE Bank 1 group)</li> <li>• IE CA responsible for the supervision of IE Crowdfunding service provider will provide to the ESAs individual RoI (in case that FE is not included into the prudential scope of consolidation of IE Bank 1 group and equally DE Bank 1 group)</li> </ul>

##	Category	Question	Answer
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Example 3. Cross-border cross-sectoral group (DORA Group) with multiple non-integrated CAs		
Italy	France	Ireland
<p>IT Bank 1 (LSI, ultimate parent)</p> <p>IT Bank 2</p> <p>IT Issuer of ART 1</p> <p>IT Insurance 1</p> <p>IT Fund manager 1</p>	<p>FR Bank 1</p> <p>FR Insurance 1</p> <p>FR Fund manager 1</p> <p>FR Fund manager 2</p> <p>FR Fund manager 3</p>	<p>IE Bank 1</p> <p>IE Insurance 1</p> <p>IE Crowdfunding service provider 1</p>
<ul style="list-style-type: none"> <li>IT CA responsible for supervision of IT Bank 1 will provide to the ESAs group Rol from IT Bank 1 covering the prudential scope of consolidation, including IT Bank 2, FR Bank 1 and IE Bank 1. (IT Issuer of ART 1, IT Fund Manager 1 and IE Crowdfunding service provider 1 can be included, if they are included into the prudential scope of consolidation, IT Bank 1 banking group)</li> <li>IT CA responsible for supervision of insurance, will provide to the ESAs consolidated Rol covering insurance prudential group IT Insurance 1 including FR Insurance 1 and IE insurance 1.</li> <li>IT CA responsible for the supervision of issuers of asset-reference tokens will provide to the EBA individual Rol for IT Issuer of ART 1 in case that FE is not included into the prudential scope of consolidation of IT Bank 1 group and equally IT Bank 1 group)</li> <li>IT CA responsible for the supervision of fund managers will provide to the ESAs consolidated register for IT Fund manager 1 covering also FR Fund Manager 1, FR Fund Manager 2 and Fund Manager 3 (in case that FE is not included into the prudential scope of consolidation of IT Bank 1 group)</li> <li>IE CA responsible for the supervision of IE Crowdfunding service provider will provide to</li> </ul>		

##	Category	Question	Answer
			<p>the ESA individual RoI (in case that FE is not included into the prudential scope of consolidation of IE Bank 1 group and equally IT Bank 1 group)</p>
6	Reporting group registers/ consolidation	<p>A Group composed of both Insurance companies and banking companies with parent company subject to Insurance Supervision: Does the RoI need to be transmitted to the national CA at the highest level of consolidation and are controlled banking companies not required to send individual RoI to their CA?</p>	<p>Reporting obligations for the register of information largely follow the same logic as the supervisory responsibilities of the competent authorities under DORA. To this end, in case where the ultimate parent undertaken is subject to the supervision only by the sectoral supervisor in this example only with the responsibilities for the supervision of insurance undertaking and not credit institutions, then the financial entity will send a register containing the insurance group to that competent authority and then the part of the banking group to the competent authority responsible for the supervision of credit institutions. Where the competent authority is the same (integrated competent authority (e.g. like <i>Finansinspektionen</i> in Sweden, or <i>Finantsinspektsioon</i> in Estonia) only one consolidated register containing both banking and insurance parts of the group will need to be reported.</p> <p>This is for the reason as in accordance with the DORA requirements and supervisory needs of the competent authorities, the competent authorities may require access to the registers of information for the financial entities under their supervision.</p>
7	Reporting group registers/ consolidation	<p>What does it mean that the contents of the register should be available at the financial entity, sub-consolidated and consolidated levels? How to do it in a situation where the holding includes financial entities, their agents and ICT suppliers, + external (outside of the holding) ICT suppliers?</p>	<p>The obligation to keep registers of information applies only to financial entities, so the financial entities belonging to a group of financial entities will need to be able to produce a register of information at the level of an individual financial entity, whereas the parent undertaking of such financial entity at the sub-consolidated, or consolidated level would need to be able to produce also register of information at sub-consolidated or consolidated level respectively. ICT service providers belonging to the group are not considered as financial entities and should not have registers by themselves, however, if they are offering ICT service to the group entities then they are considered as intragroup-service providers to be recorded in the registers kept by the financial entities belonging to the group.</p>



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8	Reporting group registers/ consolidation	Is it possible to report various entities? In case we submit the register for a group of entities, example sectorial entities that report to the same CA and each of them maintain its own register, so we expect informing in this table that each entity is responsible to maintain its own register)	The consolidated register to be maintained by the entity in charge of the reporting (e.g. parent undertaking of a group of financial entities) should include information regarding all financial entities in the scope of the group. Where all of such entities are within the supervisory responsibilities of the same competent authority then only one consolidated register containing info regarding the subsidiaries should be reported. Each entity that is part of the group will still bear the responsibility for maintaining own register, but the reporting for the purposes of the CTPP designation should be done at the consolidated level.
9	Reporting group registers/ consolidation	How can a financial entity consolidate the registers in case of several sister companies, and in case those are supervised by different regulators?	If there is no ultimate parent undertaking being supervised by the integrated competent authority, or several sectorial authorities at which level consolidated register can be provided, then the financial entities will need to report their registers of information individually (on individual basis) to the relevant competent authorities.
10	Populating the register	What should be reported in B_01.02.0010 in case a financial entity has different licences and can be treated as different financial entity types at the same time?	Financial entities should avoid duplication of key values (see <a href="#">Data Model for DORA RoI.pdf</a> ), as such duplication would trigger a data quality error. Since B_01.02.0010 is the only key value in template B_02.02, no duplicate LEIs can be reported. In this case, a financial entity having different licences that could allow for it to be considered as more than one financial entity type for the same LEI should choose only one financial entity type to report in the field B_01.02.0040. Financial entities should liaise with the relevant competent authorities to get further guidance on the single financial entity type to use.  The financial entity will need to ensure covering all the contracts and ICT TPPs associated to all entity types that apply to the entity in one register, so the register is complete irrespective of the type of entity selected for reporting purposes.
11	Timelines / Deadlines	What are the reporting deadlines in 2025 and 2026 onwards?	In accordance with the ESAs Decision concerning the reporting by the competent authorities of the information necessary for the designation of critical ICT-third party service providers (CTPPs) of 8

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			<p>November (see <a href="#">ESA 2024 22</a>) in 2025 the registers of information will need to be reported by the competent authorities to the ESAs by 30 April 2025.</p> <p>From 2026 onwards, the deadline to the reporting of the registers by the competent authorities to the ESA is set to 31 March of each calendar year.</p> <p>In both cases, at their level, the competent authorities will fix earlier deadlines for the financial entities to report the registers to the competent authorities, so they could report the registers of information to the ESAs on time.</p>
12	Timelines / Deadlines	Will there be specific deadlines for reporting to the competent authorities, and when they will be made available?	<p>In 2025 the ESAs will be able to receive files from the competent authorities from mid-April and then on a rolling basis onwards. As the reporting is done through the relevant competent authorities, they may set up specific deadlines ahead of the deadline to report the files to the ESAs to facilitate their own internal processes.</p> <p>Competent authorities will communicate such deadlines, where relevant, to the financial entities in their jurisdictions. The ESAs do not maintain a record of such individual deadlines.</p>
13	Reference date	Is there a specific reference date for the registers of information? What is the period of observations to be included in the reporting?	<p>In accordance with the ESAs Decision concerning the reporting by the competent authorities of the information necessary for the designation of critical ICT-third party service providers (CTPPs) of 8 November (see <a href="#">ESA 2024 22</a>) the reference date for the registers to be reported in 2025 is set to 31 March 2025, and then for 31 December of preceding year for the registers to be reported from 2026 onwards.</p> <p>However, considering the specificity of the registers of information focusing from the reporting perspective on valid or in-force contracts at the time of the reporting this reference date is not strongly enforced in practices. Therefore, there is no specific validation rules applied on a reference data apart from the date format. Please also see validation and data quality checks questions.</p>

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14	Reporting flows and channels	To whom should the financial entities send their registers of information, to the ESAs or to the competent authorities?	<p>The reporting of the registers of information to the ESAs is sequential, financial entities will need to provide their registers to their competent authorities first, and then the competent authorities will submit them to the ESAs.</p> <p>Specific channels for reporting to the competent authorities will be specified by the competent authorities both for the dry run and for the steady-state reporting.</p>  <table border="1" data-bbox="1008 813 2128 1133"> <tr> <td></td> <td><b>Content</b></td> <td> <ul style="list-style-type: none"> <li>Register of information at:                             <ul style="list-style-type: none"> <li>entity level</li> <li>sub-consolidated level (where applicable)</li> <li>consolidated level (where applicable)</li> </ul> </li> <li>Article 28(3) of DORA L1. 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15	Reporting flows and channels	Can a financial entity use the existing reporting channels that they have established with the competent authorities for the reporting purposes, or the same channels are used in 2024 dry run exercise?	<p>The relevant competent authorities that will be collecting registers from the financial entities will inform the financial entities about the use of reporting channels to collect the registers.</p> <p>The ESAs are setting up the reporting channels between the competent authorities and the ESAs.</p>																				

##	Category	Question	Answer
16	Language	Can financial entities provide registers in languages other than English?	<p>Yes. The register can be reported in other languages than English, however, internal consistency of the registers should be ensured, i.e. information for all financial entities covered by the same register is provided in one consistent language.</p> <p>For languages using non-Latin alphabet, financial entities are encouraged to provide as many data fields as possible using Latin alphabet, unless otherwise required by the reporting instructions (e.g. legal names of entities, where such legal names are in non-Latin alphabets).</p>
20	Role of the competent authorities	What is the role for the competent authorities in the official reporting?	<p>Competent authorities act in accordance with the DORA and use their power to request the full register of information in accordance with Article 28(3), fourth subparagraph of DORA.</p> <p>In accordance with the ESAs Decision concerning the reporting by the competent authorities of the information necessary for the designation of critical ICT-third party service providers (CTPPs) of 8 November (see <a href="#">ESA 2024 22</a>), competent authorities are responsible for the collection of the registers from the financial entities under their supervision as well as for ensuring the data has undergone quality checks before being submitted to the ESAs.</p> <p>In addition, the competent authorities act as a gateway and communication channel between the financial entities and the ESAs, as will be also the ones providing data quality feedback to the financial entities and requiring re-submission of data, where necessary.</p>
21	Role of the competent authorities	What is the relevant competent authority for a specific financial entity, and what if there are several of them?	<p>The competences of the competent authorities and appointment of the competent authorities for DORA purposes, including the collection of registers of information, depend on the type of financial entity and it is done in accordance with Article 46 of DORA.</p>

##	Category	Question	Answer
17	Outsourcing guidelines / RoI	How the EBA Outsourcing register will coexist next to the DORA Register of Information, as there is a lot of overlap of information and how it will affect the reporting?	<p>The EBA is currently working on the update of its outsourcing guidelines to ensure also better alignment with the DORA requirements. The revised guidelines will be published for a public consultation in H1 2025.</p> <p>FEs could leverage the register of information under DORA for the maintenance of their register of information on all third-party arrangements to ensure consistency and reduce discrepancies.</p>
<b>Technical aspects of reporting of registers of information to the ESAs</b>			
18	Technical formats for reporting	What format will be required to provide registers of information?	<p>The registers of information are to be reported in plain-csv format according to the specification provided by the ESAs. Please refer to the information provided here: <a href="#">Preparations for reporting of DORA registers of information   European Banking Authority</a></p> <p>This simplified plain csv format for the reporting of the registers has been already tried in 2024 Dry Run exercise.</p>
19	Technical formats for reporting	How can financial entities generate reporting files in the specified format? Is any special software needed?	<p>Financial entities can generate the required reporting files .csv and .zip files for the submission of the registers of information either directly from their systems containing the registers of information (according to the specification of the technical files and filing rules provided see <a href="#">Preparations for reporting of DORA registers of information   European Banking Authority</a>). The conversion tool that was provided for the 2024 Dry Run is not provided for official reporting.</p>
20	Technical formats for reporting	What is the difference between plain-csv and xbrl-csv?	<p>Plain-csv is supported by xBRL-JSON meta data files defined in the taxonomy. Users can use taxonomy and the xBRL-JSON meta data to validate their plain-csv files if they wish.</p>

##	Category	Question	Answer
21	Tools and templates for reporting	Should financial entities use templates in Excel or can have registers in other systems? If Excel can be used, where are the updated templates?	<p>The ESAs do not prescribe any formats or specific technical solutions for the actual keeping of the registers by the financial entities. Financial entities are free to adopt their own solutions that are most suitable for the purposes of ICT and third-party risk management in accordance with DORA.</p> <p>The technical specifications provided by the ESAs, including the data point model, data dictionary, taxonomy and validation rules (see <a href="#">Preparations for reporting of DORA registers of information   European Banking Authority</a>), affect only reporting of the registers to the ESAs through the competent authorities.</p> <p>Considering that the reporting to the ESAs is not to be done in Excel, and given the requirements of the referential integrity imposed by the data point model, the ESAs are not in position to create an Excel solution respecting all referential integrity and data model requirements that would pass the technical and business validation rules at the time of reporting, not the least due to the limitations of Excel.</p>
22	Testing the reporting channels	Would it be possible for financial entities to test the reporting channels?	<p>The reporting of the registers to the ESAs is sequential: (1) financial entities report their registers to the relevant competent authorities and (2) those report the files to the ESAs (the EBA is the solution provider to the ESAs). Whilst there will be testing possibilities for the competent authorities to test the EBA reporting framework, financial entities should reach out to the relevant authorities regarding any test submission from the financial entities to the competent authorities.</p>
23	Tools for reporting	If Microsoft Access (or similar software) is used to keep the register of information database would it be possible for a financial entity to generate CSVs themselves, and will these CSVs be accepted?	<p>The ESAs do not prescribe any specific tools for keeping the registers of information. Financial entities can use any tools or databases they see best fitting their needs, provided the tools meet the requirements in terms of the content of the registers as set out in the ITS on the registers of information and, when it comes to reporting, have a possibility to generate reporting files in accordance with the specifications set by the competent authorities for the reporting of the registers of information to them and by the ESAs for reporting to the ESAs.</p>

##	Category	Question	Answer
24	Naming conventions for reported files	What are the conventions for naming the reporting files to be reported to the ESAs?	<p>The files should be reported to the ESAs in .zip file names in according with the following convention:</p> <p><i>ReportSubject.CON/.IND_Country_FrameworkCodeModuleVersion_Module_ReferenceDate_CreationTimestamp.zip</i> where:</p> <ul style="list-style-type: none"> <li>• <i>ReportSubject</i> is the LEI code of a reporting financial entity</li> <li>• <i>CON/IND</i> is the indication whether the file is being reported at the consolidated (CON) or individual entity level (IND)</li> <li>• <i>Country</i> is the two-letter ISO code of the country of an entity</li> <li>• <i>FrameworkCodeModuleVersion</i> is DORA 010100</li> <li>• <i>Reference date</i> is 2025-0331 for the first reporting in 2025</li> <li>• <i>CreationTimestamp</i> is the timestamp when the reporting file was created</li> </ul> <p>Example: DUMMYLEI123456789012.CON_IT_DORA010100_DORA_2025-03-31_20250421141632000.zip</p> <p>Please also see here: <a href="https://www.eba.europa.eu/sites/default/files/2025-01/1e5ffe22-64b2-4260-8fbf-8dcf095dfe4b/Preparing%20Plain%20csv%20reporting%20package%20for%20DORA.pdf">https://www.eba.europa.eu/sites/default/files/2025-01/1e5ffe22-64b2-4260-8fbf-8dcf095dfe4b/Preparing%20Plain%20csv%20reporting%20package%20for%20DORA.pdf</a> and sample files here: <a href="https://www.eba.europa.eu/sites/default/files/2024-12/f4519b45-d6c2-4e7d-a8d4-4bee91a9c530/sample_documents.zip">https://www.eba.europa.eu/sites/default/files/2024-12/f4519b45-d6c2-4e7d-a8d4-4bee91a9c530/sample_documents.zip</a></p>
25	Use of the codes when reporting	Which values to be used in the drop-down data fields, the ones from the ITS or the ones from the	<p>The values to be reported in the drop-down data fields are explained in the ITS (<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R2956">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R2956</a>) and these are the actual values in a human-readable format. However, for reporting purposes the values should be replaced by the codes</p>

##	Category	Question	Answer
	drop-down values	data point model (DPM)? We see that they are different.	<p>provided in the data point model (DPM) preceding with prefix ‘eba_’ according to the filling rules (<a href="https://www.eba.europa.eu/sites/default/files/2025-01/1f92a6e9-9e5a-41e8-bd44-0dc757f754c2/EBA%20Filing%20Rules%20v5.5_2025_01_14%20%281%29.pdf">https://www.eba.europa.eu/sites/default/files/2025-01/1f92a6e9-9e5a-41e8-bd44-0dc757f754c2/EBA%20Filing%20Rules%20v5.5_2025_01_14%20%281%29.pdf</a>).</p> <p>To help navigate all the codes associated with the values in the drop-down data fields, the ESAs prepared a mapping file providing all the values and their codes (see <a href="https://www.eba.europa.eu/sites/default/files/2025-01/fbbe67ab-8b41-446c-8ce2-1caf0b67bfe9/Dropdown%20options%20DORA%20V4.0.xlsx">https://www.eba.europa.eu/sites/default/files/2025-01/fbbe67ab-8b41-446c-8ce2-1caf0b67bfe9/Dropdown%20options%20DORA%20V4.0.xlsx</a>).</p> <p>These codes are valid with respect to the data point model provided in the EBA technical reporting package v4.0 (see: <a href="https://www.eba.europa.eu/risk-and-data-analysis/reporting-frameworks/reporting-framework-40">https://www.eba.europa.eu/risk-and-data-analysis/reporting-frameworks/reporting-framework-40</a>) and are valid for the reporting of registers in 2025. For any further use, please consult and verify EBA reporting frameworks valid at the time of reporting.</p>
26	Missing data	When some fields cannot be filled in, what should be put in there?	<p>If financial entities are not able to fill some data fields that are mandatory, they can leave these data fields blank (report empty values), unless the instructions to the data fields or responses to Q&amp;A specify otherwise (please refer to responses to DORA Q&amp;A 140, 141, 142, 143, 144, 145, 146, 147). These will be highlighted as data quality issues in the data quality feedback.</p> <p>However, financial entities cannot report empty values for the data fields identified as keys in the data model (<a href="#">Data Model for DORA Rol.pdf</a>). If the financial entity cannot provide a value for a specific field that is identified as a primary key in the data model, the financial entity should report ‘Not Applicable’ in that field.</p> <p>More clarifications regarding the use of identifiers is provided in the section “Use of identifiers for the reporting purposes” below and in the DORA Q&amp;A 148.</p>



##	Category	Question	Answer
27	Validation rules and data quality checks	What validation checks and data quality checks will be applied by the ESAs when receiving registers of information?	<p>The validation rules and data quality checks to be applied by the ESAs upon receipt of the registers of information files from the competent authorities consist of three layers in the data validation process: (1) technical layer, (2) DPM validation and (3) business checks layer.</p> <p><b>Technical layer:</b> upon reception each submission will be assessed based on a list of technical checks before being integrated in the EBA's systems. Submission not respecting the technical checks included in this layer will be rejected with the feedback provided to the submitter. The submitters will be expected to resubmit the files after correcting the errors.</p> <p><b>Validation layer:</b> After passing the technical layer, the data that is accepted and stored will be subject to data quality checks in the validation layer. These checks will be applied to the data reported in the individual files of the Register of Information. Failing one of these checks will trigger an error that will be flagged to the submitter as part of data quality feedback. The submitter will be expected to resubmit the files after correcting the errors within the timelines indicated by the competent authorities. The validation layer consists of three elements:</p> <ul style="list-style-type: none"> <li>(1) DPM technical checks - include technical checks that will be applied after the integration of the files and will not cause an immediate rejection of the file, but will trigger an error</li> <li>(2) DPM business validation rules - include the DPM automatic checks that are extracted for the ease of reference from the reporting technical package 4.0 published in December 2024 (see <a href="#">here</a>).</li> <li>(3) (3) LEI - EUID checks - all the rules that include a check against an external database (i.e., GLEIF for LEI checks and/or BRIS for EUID checks)</li> </ul> <p>A complete overview of the technical checks, validation and business checks that will be applied by the ESAs upon receipt of the reporting files from the competent authorities could be found here:</p>

##	Category	Question	Answer
			<a href="https://www.eba.europa.eu/sites/default/files/2025-01/3c9f34b6-236f-4520-ac05-02ffb9d63fb5/Overview%20of%20the%20RoI%20reporting%20technical%20checks%20and%20validation%20rules.xlsx">https://www.eba.europa.eu/sites/default/files/2025-01/3c9f34b6-236f-4520-ac05-02ffb9d63fb5/Overview%20of%20the%20RoI%20reporting%20technical%20checks%20and%20validation%20rules.xlsx</a> .
28	Data quality feedback	What is the approach to sharing/receiving data quality feedback?	<p>Upon completing the data quality checks, the ESAs will provide data quality feedback to the competent authorities submitting the files. This feedback may be shared with the financial entities by the competent authorities, especially if, following the feedback, the resubmission of the files is needed to address data quality issues. The data quality feedback will be provided by the ESAs in the following format:</p> <p><b>Response Format:</b></p> <ul style="list-style-type: none"> <li>• A zip file with <b>two CSV</b> files</li> <li>• One file with the instance level feedback and one with a table of all the findings</li> </ul> <p><b>Response Names:</b></p> <p><b>Reject DORA Report – REJECTED (NOK):</b></p> <p>549300Q5EH2NP82EPE32.CON_BE_DORA010100_DORA_2025-03-31_20250320120441498_NOK_20250405164729943.zip</p> <p><b>Acknowledgment of Receipt - PENDING_FURTHER_VALIDATIONS (PEN):</b></p> <p>549300Q5EH2NP82EPE32.CON_BE_DORA010100_DORA_2025-03-31_20250320120441498_PEN_20250405164729943.zip</p> <p><b>Results of DPM and EUID/LEI checks - VALIDATION_RESULTS(RES):</b></p>

##	Category	Question	Answer
			<p>549300Q5EH2NP82EPE32.CON_BE_DORA010100_DORA_2025-03-31_20250320120441498_RES_20250405164729943.zip</p> <p><b>Structure is:</b></p> <p>549300Q5EH2NP82EPE32.CON_BE_DORA010100_DORA_2025-03-31_20250320120441498_RES_20250405164729943.zip</p> <p>549300Q5EH2NP82EPE32.CON_BE_DORA010100_DORA_2025-03-31_20250320120441498_RES_20250405164729943 (folder)</p> <p>instance-status.csv</p> <p>detailed-feedback.csv <u>(in the case of PENDING FURTHER VALIDATIONS, no detailed-feedback.csv will be present in the zip file)</u></p> <p>Please refer to <a href="https://www.eba.europa.eu/sites/default/files/2025-02/9613c396-38b6-41fe-86a7-47c2c6461ef2/20250210%20-%20RoI%20validation%20feedback%20explanation.pdf">https://www.eba.europa.eu/sites/default/files/2025-02/9613c396-38b6-41fe-86a7-47c2c6461ef2/20250210%20-%20RoI%20validation%20feedback%20explanation.pdf</a> for more information and examples of the feedback messages here <a href="https://www.eba.europa.eu/sites/default/files/2025-02/79996a34-6946-45ef-9d72-ee077cd7f85e/DORA%20Sample%20Responses-referencedate-2025-03-31.zip">https://www.eba.europa.eu/sites/default/files/2025-02/79996a34-6946-45ef-9d72-ee077cd7f85e/DORA%20Sample%20Responses-referencedate-2025-03-31.zip</a></p>
29	Data quality feedback	When is something treated as a resubmission?	<p>If the data quality feedback has findings in the VALIDATION_RESULTS file, then the RoI files will need to be resubmitted within the timeline indicated by the competent authority addressing the identified findings.</p> <p>The file names for the resubmission should follow the same naming conventions as the reported files, but with different timestamp in the name of the file. The file should have the following format:</p>

##	Category	Question	Answer
			<p><b>ReportSubject.CON/.IND_Country_FrameworkCodeModuleVersion_Module_ReferenceDate_CreationTimestamp.zip</b></p> <p>If a <b>DORA</b> file is received</p> <ul style="list-style-type: none"> <li>a) from the same <b>CA</b> (not in the filename)</li> <li>b) about the same <b>ReportSubject.CON/.IND</b></li> <li>c) For the same <b>ReferenceDate</b></li> </ul>
30	Data quality feedback	Why did ESAs choose csv as response format instead of the .json?	<p>The .json format is more technical and the assumption is that many market participants will not have a tool to open the .json responses while csv allows for easier filtering of the validation results.</p> <p>In addition, the DORA validation results file (VALIDATION_RESULTS) will list all the findings, not just the first 10 per category. Therefore, as csv is more compact than .json, it will be more practical.</p>
31	Data quality feedback	Why ESAs do not send ACCEPT messages if there are no validation findings?	<p>Having no findings does not mean that the data is accepted, since the validation layer does not examine all the information within the file and does not compare the data across files. In particular, the ESAs and the competent authorities may have additional questions regarding the data in the registers of information during the analysis process, and some files may prove to be unusable for the analysis and use in the CTPP designation only at this later stage.</p>
32	Data model	Where can I find the data model for the register of information?	<p>The data model for the register of information as a schematic drawing is available here (<a href="#">Data Model for DORA RoI.pdf</a>). The complete data point model in an annotated table format is available here (<a href="https://www.eba.europa.eu/sites/default/files/2024-12/7ae0363a-ad3d-42d9-a192-">https://www.eba.europa.eu/sites/default/files/2024-12/7ae0363a-ad3d-42d9-a192-</a></p>

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			<a href="#">34711416c039/annotated_templates.zip</a> ). To access and download the table, search '20241217 Annotated Table Layout DORADORA 4.0'.																																																																																																																																																																																																										
33	Data model	How to identify mandatory data fields?	The reporting instructions provided in the Final ITS ( <a href="#">L_202402956EN.000101.fmx.xml</a> ) as well as in the data point model identify which data fields are mandatory, including their conditionality, where relevant.																																																																																																																																																																																																										
34	Data model	What determines/differentiates a key column to a non-key column?	Key values are clearly identified in the data point model (annotated table) with <Key value>. Please also refer to the data model schematic drawing and table ( <a href="#">Data Model for DORA RoI.pdf</a> )																																																																																																																																																																																																										
35	Data model	<p>In several tables of the DPM annotated table there are additional columns labelled 'Link' added to the templates that do not appear in the ITS. What is their purpose and what to do with them?</p> <table border="1"> <thead> <tr> <th>Rows</th> <th>Columns</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>B_03.03 - Entities signing the Contractual arrangements for providing ICT service(s) to other entity within the scope</td> </tr> <tr> <td>2</td> <td></td> </tr> <tr> <td>3</td> <td></td> </tr> <tr> <td>4</td> <td></td> </tr> <tr> <td>5</td> <td>Contractual arrangement reference number</td> </tr> <tr> <td>6</td> <td>LEI of the entity providing ICT services</td> </tr> <tr> <td>7</td> <td>Link</td> </tr> <tr> <td>8</td> <td>TRUE</td> </tr> <tr> <td>9</td> <td>480197</td> </tr> <tr> <td>10</td> <td>480203</td> </tr> <tr> <td>11</td> <td>480863</td> </tr> <tr> <td>12</td> <td>TRUE</td> </tr> <tr> <td>13</td> <td></td> </tr> <tr> <td>14</td> <td></td> </tr> <tr> <td>15</td> <td></td> </tr> <tr> <td>16</td> <td></td> </tr> <tr> <td>17</td> <td></td> </tr> <tr> <td>18</td> <td></td> </tr> <tr> <td>19</td> <td></td> </tr> <tr> <td>20</td> <td></td> </tr> <tr> <td>21</td> <td></td> </tr> <tr> <td>22</td> <td></td> </tr> <tr> <td>23</td> <td></td> </tr> <tr> <td>24</td> <td></td> </tr> <tr> <td>25</td> <td></td> </tr> <tr> <td>26</td> <td></td> </tr> <tr> <td>27</td> <td></td> </tr> <tr> <td>28</td> <td></td> </tr> <tr> <td>29</td> <td></td> </tr> <tr> <td>30</td> <td></td> </tr> <tr> <td>31</td> <td></td> </tr> <tr> <td>32</td> <td></td> </tr> <tr> <td>33</td> <td></td> </tr> <tr> <td>34</td> <td></td> </tr> <tr> <td>35</td> <td></td> </tr> <tr> <td>36</td> <td></td> </tr> <tr> <td>37</td> <td></td> </tr> <tr> <td>38</td> <td></td> </tr> <tr> <td>39</td> <td></td> </tr> <tr> <td>40</td> <td></td> </tr> <tr> <td>41</td> <td></td> </tr> <tr> <td>42</td> <td></td> </tr> <tr> <td>43</td> <td></td> </tr> <tr> <td>44</td> <td></td> </tr> <tr> <td>45</td> <td></td> </tr> <tr> <td>46</td> <td></td> </tr> <tr> <td>47</td> <td></td> </tr> <tr> <td>48</td> <td></td> </tr> <tr> <td>49</td> <td></td> </tr> <tr> <td>50</td> <td></td> </tr> <tr> <td>51</td> <td></td> </tr> <tr> <td>52</td> <td></td> </tr> <tr> <td>53</td> <td></td> </tr> <tr> <td>54</td> <td></td> </tr> <tr> <td>55</td> <td></td> </tr> <tr> <td>56</td> <td></td> </tr> <tr> <td>57</td> <td></td> </tr> <tr> <td>58</td> <td></td> </tr> <tr> <td>59</td> <td></td> </tr> <tr> <td>60</td> <td></td> </tr> <tr> <td>61</td> <td></td> </tr> <tr> <td>62</td> <td></td> </tr> <tr> <td>63</td> <td></td> </tr> <tr> <td>64</td> <td></td> </tr> <tr> <td>65</td> <td></td> </tr> <tr> <td>66</td> <td></td> </tr> <tr> <td>67</td> <td></td> </tr> <tr> <td>68</td> <td></td> </tr> <tr> <td>69</td> <td></td> </tr> <tr> <td>70</td> <td></td> </tr> <tr> <td>71</td> <td></td> </tr> <tr> <td>72</td> <td></td> </tr> <tr> <td>73</td> <td></td> </tr> <tr> <td>74</td> <td></td> </tr> <tr> <td>75</td> <td></td> </tr> <tr> <td>76</td> <td></td> </tr> <tr> <td>77</td> <td></td> </tr> <tr> <td>78</td> <td></td> </tr> <tr> <td>79</td> <td></td> </tr> <tr> <td>80</td> <td></td> </tr> <tr> <td>81</td> <td></td> </tr> <tr> <td>82</td> <td></td> </tr> <tr> <td>83</td> <td></td> </tr> <tr> <td>84</td> <td></td> </tr> <tr> <td>85</td> <td></td> </tr> <tr> <td>86</td> <td></td> </tr> <tr> <td>87</td> <td></td> </tr> <tr> <td>88</td> <td></td> </tr> <tr> <td>89</td> <td></td> </tr> <tr> <td>90</td> <td></td> </tr> <tr> <td>91</td> <td></td> </tr> <tr> <td>92</td> <td></td> </tr> <tr> <td>93</td> <td></td> </tr> <tr> <td>94</td> <td></td> </tr> <tr> <td>95</td> <td></td> </tr> <tr> <td>96</td> <td></td> </tr> <tr> <td>97</td> <td></td> </tr> <tr> <td>98</td> <td></td> </tr> <tr> <td>99</td> <td></td> </tr> <tr> <td>100</td> <td></td> </tr> </tbody> </table>	Rows	Columns	1	B_03.03 - Entities signing the Contractual arrangements for providing ICT service(s) to other entity within the scope	2		3		4		5	Contractual arrangement reference number	6	LEI of the entity providing ICT services	7	Link	8	TRUE	9	480197	10	480203	11	480863	12	TRUE	13		14		15		16		17		18		19		20		21		22		23		24		25		26		27		28		29		30		31		32		33		34		35		36		37		38		39		40		41		42		43		44		45		46		47		48		49		50		51		52		53		54		55		56		57		58		59		60		61		62		63		64		65		66		67		68		69		70		71		72		73		74		75		76		77		78		79		80		81		82		83		84		85		86		87		88		89		90		91		92		93		94		95		96		97		98		99		100		<p>This collum appears in several places in the DPM. This is due to technical constraints from the data model that does not allow a table to have just key values. In these cases, another column was added that always takes by default an already defined value (TRUE) just to have an artificial FACT. Financial entities should ignore this collum in DPM annotated tables as nothing is required to be reported there.</p>
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##	Category	Question	Answer
36	Use of additional rows	Article 4 (2) ITS RoI: if an additional row is necessary (more than one value), is there a need to fill all the data points again in the additional row or just the data point (column) where more than one value is valid?	All rows need to be completely filled. However, financial entities should ensure that additional rows do not introduce duplication of key values (see <a href="#">Data Model for DORA RoI.pdf</a> ). Such duplication will be highlighted in the data quality feedback as duplicate values.
37	Use of additional rows	What if there are several data values to be reported for the same item, e.g. several location of data centres, how to report them?	All relevant data values should be reported in separate rows, ensuring that the all the rows are completely filled. If you have two data centre locations, then two rows should be added filled with the same information, except the data centre location, which will be different. However, financial entities should also ensure that additional rows do not introduce duplication of key values (see <a href="#">Data Model for DORA RoI.pdf</a> ). Such duplication will be highlighted in the data quality feedback as duplicate values.
38	Data protection	What tools do the ESAs have to protect the information reported to them?	For the purposes of the official reporting of the registers of information, the ESAs use same infrastructure used currently for the collection of prudential reporting. From the design perspective, it is assumed that the security classification of the data contained in the registers of information and, therefore, handled by the ESAs, is up to and including 'EU SNC' (Sensitive Non-Classified) level.
<b>Use of identifiers for the reporting purposes</b>			
39	Use of identifiers	What identifiers can be used in the registers for financial entities and ICT third-party service providers?	<p>The final text of the ITS on the registers of information (<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R2956">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R2956</a>) requires financial entities to use only LEIs to identify financial entities. Therefore, only the LEI is available to be used as identifier in the templates B_01.01 and B_01.02.</p> <p>For the identification of ICT third-party service providers in template B_05.01 financial entities can use one of the following identifiers:</p>

##	Category	Question	Answer
			<ol style="list-style-type: none"> <li>1. LEI – for all ICT third-party service providers</li> <li>2. EUID - for the EU-registered ICT third-party service providers that are legal persons and are registered in the business registers of EU Member States</li> <li>3. CRN for Corporate registration number – for ICT third-party service providers that are natural persons acting in business capacity</li> <li>4. VAT for VAT number - for ICT third-party service providers that are natural persons acting in business capacity</li> <li>5. PNR for Passport Number - for ICT third-party service providers that are natural persons acting in business capacity</li> <li>6. NIN for National Identity Number - for ICT third-party service providers that are natural persons acting in business capacity</li> </ol> <p>This means that for TPPs that are legal persons, only LEI or EUID can be used, while for TPPs that are legal persons registered in third countries (outside of the EU) only LEI can be used.</p>
40	Use of identifiers	What identifier should be reported if the LEI for the ICT third-party provider registered in a third country is not available?	<p>Identifiers are key values in accordance with the data model (<a href="https://www.eba.europa.eu/sites/default/files/2024-11/0f0f79a0-6f9d-413f-b6f3-917371e404ba/Data%20Model%20for%20DORA%20RoI.pdf">https://www.eba.europa.eu/sites/default/files/2024-11/0f0f79a0-6f9d-413f-b6f3-917371e404ba/Data%20Model%20for%20DORA%20RoI.pdf</a>) and therefore cannot be left empty. Empty key values according to the data model will not pass the referential integrity checks and the whole reporting file will be rejected (see also questions on validation and data quality checks).</p> <p>In case the LEI is not available for the ICT third-party provider (or its ultimate parent undertakings) registered in third countries, the financial entity should populate the data filed with any relevant value to avoid the file being rejected as failing the referential integrity check. In practice this could mean that the financial entity could use other identifiers available. The use of such identifiers will be highlighted as a data quality issue, but the files will not be rejected. Whether the ESAs will be able to use the entries with such missing or invalid LEI will depend on the overall quality of the relevant entries and any other data quality issues identified in the checks.</p>

##	Category	Question	Answer
41	Use of identifiers	Where can financial entities find EUID to be used to identify EU-based ICT third-party service providers?	<p>EUID is available for most of the EU-registered companies in the national business registers that can be found using the EU Commission tool – Business Register Interconnection System (BRIS) - <a href="#">European e-Justice Portal - Business registers at European level</a></p> <p>Note that only manual searches on BRIS are available and there are no API for batch processing.</p>
42	Use of identifiers	How do ESAs intend to aggregate the ICT TPPs provided in the different RoI when the LEI is not available for all of them? Which database are the ESAs using to look up the LEI or EUID?	<p>When filling the register, financial entities are also required to provide identification of the ultimate parent undertaking for the ICT TPP – data field B_05.01.0110. This identifier will be used in the analysis to group all relevant TPPs belonging to the same group. Therefore, it is important to ensure that such identifier is provided in the submission.</p> <p>Where possible and depending on the identifier provided in this data field, the ESAs will use the reference data to check the information, e.g. GLEIF database for LEI codes and BRIS for EUID codes.</p>
43	Use of identifiers	How is the contractual arrangement reference number determined?	Contractual arrangement reference number is chosen by the financial entity. The financial entity should ensure the consistency of this identifier, especially its uniqueness throughout the RoI when part of a group to avoid confusion with other contractual arrangements.
44	Use of identifiers	Will lapsed LEI identifiers be accepted?	The ITS on the registers of information requires LEI to be active. As part of the validation rules, LEIs are checked against an external database (GLEIF). While this check will ensure that the LEI is a valid one in GLEIF. During the initial stages of the reporting of the registers of information and in particular in 2025, the ESAs will not be enforcing strict checks of the LEI status (e.g., active, lapsed, etc.).
45	Use of identifiers	Should the EUID be reported with or without the dot shown?	The EUID format always combines the identifiers for the country and the trade register name with the company's identifier in the trade register. The two identifiers (country/trade registers and company's



##	Category	Question	Answer
			<p>identifier) are separated by a dot. The full ID, including the dot, should be used as an integral part of the code.</p>
<p><b>Inconsistencies between the final ITS (as published in the Official Journal) and data point model</b></p>			
46	Error in the published version of the ITS	Data point B_06.01.0050 is missing from the official ITS templates. Is this data point no longer applicable?	<p>Whilst all the relevant data fields are present, there is a numbering error in the numbering of the column codes in template-specific instructions to Template B_06.01 in the text published in the EU Official Journal with the value. In particular, B_06.01.0050 is missing in the column codes, resulting in the data fields being assigned erroneous column codes.</p> <p>For reporting purposes, the data points included in the reporting technical package v4.0 for the ITS on the Registers of information (<a href="#">Reporting framework 4.0   European Banking Authority</a>) should be considered. The data point model contains consecutive numbers of the data fields. Namely, the following numbering and the corresponding instructions/ fill-in options should be considered:</p> <ul style="list-style-type: none"> <li>• B_06.01.0050 “Criticality or importance assessment”</li> <li>• B_06.01.0060 “Reasons for criticality or importance”</li> <li>• B_06.01.0070 “Date of the last assessment of criticality or importance”</li> <li>• B_06.01.0080 “Recovery time objective of the function”</li> <li>• B_06.01.0090 “Recovery point objective of the function”</li> <li>• B_06.01.0100 “Impact of discontinuing the function”</li> </ul> <p>Please also refer to DORA Q&amp;A 171.</p>
47	Error in the published version of the ITS	How to report the type of identification code in data field B_05.01.0020 when using codes other than LEI or EUID? The fill-in instructions for field B_05.01.0020 in the ITS include 'Country Code'+Underscore+Type of Code' as an option for non-LEI and non EUID code. The instructions for this	<p>When reporting data field B_05.01.0020, financial entities should choose only the values from the closed set of options, without including the country code. One of the following values can be chosen:</p> <ol style="list-style-type: none"> <li>1. 'LEI' for LEI</li> <li>2. 'EUID' for EUID</li> <li>3. CRN for Corporate registration number</li> </ol>

##	Category	Question	Answer
		data filed are not consistent with the instruction for other similar data fields, e.g. B_05.01.0040.	<p>4. VAT for VAT number 5. PNR for Passport Number 6. NIN for National Identity Number</p> <p>This is valid for all fields that make reference to B_05.01.0020.</p> <p>Only LEI or EUID can be used for legal persons, as identified in B_05.01.0070, whereas alternative codes may be used for individuals acting in a business capacity, i.e. physical person. Only LEI can be used for legal persons that are not established in the Union. Please also refer to DORA Q&amp;A 146.</p>
48	Error in the published version of the ITS	We have identified some typos in the published version of the ITS, for example in the instruction to B_07.01.0110 or in the name of data field B_05.01.0090. How should we treat them?	<p>Indeed, the published version of the final ITS (version published in the EU Official Journal <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R2956">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R2956</a>) has some typos that do not affect the application of the legal act or the use of data point model for reporting of the registers of information. Such typos also do not necessitate clarifications through Q&amp;A and will be addressed when the ITS will be updated.</p> <p>Such typos include inter alia:</p> <ul style="list-style-type: none"> <li>• In the instructions to data field B_07.01.0110 the numbering of the drop-down values is not sequential. This does not affect the reporting as the reporting is done using the codes</li> <li>• Name of data field B_05.01.0090 includes reference to data field B_05.01.0070, whereas the correct reference as explained in the instructions to the same data field should be to B_05.01.0100.</li> </ul>
<b>General aspects of maintaining registers of information</b>			
49	Scope of the register	Should financial entities include information about their branches in the RoI?	Yes. The RoI cover branches of financial entities with a set of dedicated templates. See the following FAQ 50 for more details.
50	Scope of the register	To what extent should the register of information cover entities that are located in third countries (subsidiaries and branches in third countries)?	The scope of the registers of information held at the sub-consolidated and consolidated basis should reflect all financial entities and their branches that belong to their consolidation scope in accordance with Directive 2013/34/EU.

##	Category	Question	Answer
			When reporting the registers of information to the ESAs for the purposes of the CTPP designation, the registers of information should include only financial entities, and their branches licenced and operating in the EU. Therefore, financial entities that are subsidiaries of the EU financial entities or branches in third countries may be excluded for the purposes of reporting to the ESAs.
51	Scope of the register	Are IORPs expected to consolidate their registers with the sponsor's financial entity? Would they be expected to be separate?	Consolidation is expected for all Financial Entities in scope of DORA that are part of the same group. If the sponsor' is not a financial entity in scope of DORA or if the sponsor is not part of the same group, consolidation is not expected.
52	Scope of the registers	There are some fields that refer to contracts that have already ended (B_02.02.0080, B_02.02.0090). Is there any age limit to include these contracts in the register?	<p>In accordance with the final text of the ITS as published in the EU Official Journal, there is no requirement to include into the register terminated or expired contracts. Therefore, the data field B_02.02.0080 should have only the date of the end of the contract as provided in the contract itself, where relevant (e.g. date in the future).</p> <p>As the register should not include expired/terminated contracts, the data filed B_02.02.0090 requiring the reason for the termination or end of the contractual arrangements should be left empty.</p>
53	Retention period	The requirement to hold data in the Register for 5 years was removed from the final ITS, can you advise what the retention period expectations are around the data held in the Register please?	Indeed, the requirement to keep the expired and terminated contracts in the registers has been removed from the final ITS and therefor only active contracts need to be reported to the ESAs. There is also no formal requirements in the ITS regarding data retention and therefore the usual data retention policies at the financial entities should apply to the registers of information and the underlying data.
54	Definition of ICT services	What types of services should be considered as ICT services?	Please refer to DORA Q&A 30 on the scope of the ICT services ( <a href="https://www.eiopa.europa.eu/qa-regulation/questions-and-answers-database/2999-dora030_en">https://www.eiopa.europa.eu/qa-regulation/questions-and-answers-database/2999-dora030_en</a> ). Then, entities are considered ICT third-party service providers if they correspond to the definition of Article 3(19) of DORA or ICT intra-group service provider if they correspond to the definition of Article 3(20) of DORA.

##	Category	Question	Answer
55	Definition of ICT services and ICT service providers	Would external services such as those provided by VISA, Mastercard be considered as ICT services? If yes, under which category they should fall?	This question is dealt by DORA Q&A 161 on the definition and scope of ICT services in relation to operators of payments systems and entities involved in payment processing activities. This Q&A is still under development.
56	Populating the register	Is there an official list for functions to be reported in template B_06.01?	<p>There is no list of functions to use to fill in field B_06.01.0010. According to the ITS on register of information, financial entities shall identify and provide information on all functions of the financial entity according to the financial entity's internal organisation supported by an ICT service provided by ICT third-party service providers.</p> <p>The question is dealt in DORA Q&amp;A 19 on definition of 'functions'.</p> <p>DORA does not define 'function' to enable flexibility for the financial entities (FEs) to identify their functions in accordance with their operational and organisational framework.</p> <p>Without prejudice to Recital (70) and Article 3(22) of DORA, functions correspond to activities, services or operations (or clusters of them). Functions may include:</p> <ul style="list-style-type: none"> <li>▪ those directly tied to the FE's core business activities; and</li> <li>▪ those to be categorized as 'support functions' which enable the core activities to operate effectively.</li> </ul> <p>Among all of the FE's functions, the FE must designate those deemed critical or important functions as defined in Article 3(22) of DORA.</p>
57	Populating the register	What does 'where applicable' mean in the title of data field B_02.01.0050? What should be reported in this field in case the entity that is being reported in this template is not a financial entity (i.e., option 22,	Field B_01.02.0050 is mandatory and should be filled in also when the entity being reported in this template is not a financial entity, following the fill in instructions and choosing one options from the drop-down menu. Therefore, the reference to 'where applicable' in the name of the data field should be disregarded, and the drop-down values provided should be applied to all types of entities.

##	Category	Question	Answer
		23, or 24 was selected in field B_01.02.0040 for the entity type)?	<p>Where an entity fulfils more than one options from the closed list, the higher- level option applicable to the entity should be selected.</p> <p>Please also refer to answer to DORA Q&amp;A 140.</p>
58	Populating the register	What should be reported in the data field B_01.02.0060 in case the financial entity does not have a direct parent undertaking (for example, is the parent undertaking itself) or reports the register on an individual basis?	<p>If the financial entity does not have a direct parent undertaking, it should report its own LEI in the field B_01.02.0060, as already reported in B_01.02.0010 for the same entity, i.e., the LEI of an entity itself should be repeated.</p> <p>Please also refer to DORA Q&amp;A 141.</p>
59	Populating the register	How to report field B_02.02.0130 where the ICT service is not supporting a critical or important function considering that according to the data model this data field is a primary key?	<p>According to the data model (<a href="#">Data Model for DORA Rol.pdf</a>) data field B_02.02.0130 is marked as a primary key value. As a result, it should not be missing or reported empty. The option "Not Applicable" was added to the closed set of options. If the ICT service is not supporting a critical or important function (i.e., B_06.01.0060 = 'No' for the corresponding function identifier), then the option 'Not Applicable' should be used. The field should be filled in with the country of service otherwise.</p> <p>Please refer also refer to DORA Q&amp;A 142.</p>
60	Populating the register	The Register of Information ITS require ICT third-party service providers to confirm the "B_02.02.0130 - Country of provision of the ICT services". Can the ESAs provide further guidance on this data point and what exactly they mean by this as it is open to interpretation in the way it is drafted? For example, does this refer to the countries where a company has	<p>B_02.02.0130 refers to the country where the ICT service is processed by the ICT service provider. It focuses on the operational aspect of provision of the ICT service:</p> <ul style="list-style-type: none"> <li>▪ It does not focus on the locations of registered offices unless those locations are actively involved in the ICT service provision;</li> <li>▪ The countries where customers are based could be relevant if they affect the service's operational footprint (i.e. localised processing of the ICT service).</li> </ul>

##	Category	Question	Answer
		registered offices/affiliates, or does it mean the countries where a company's customers are based?	
61	Populating the register	How to report field B_02.02.0150 where the ICT service is not related to storage of data (B_02.02.0140 = 'No')?	<p>According to the data model (<a href="#">Data Model for DORA Rol.pdf</a>), data field B_02.02.0150 is marked as a primary key value. As result it should not be missing or reported empty. The option 'Not Applicable' was added to the closed set of options. If the ICT service is not related to storage of data (B_02.02.0140 = 'No'), then the option 'Not Applicable' should be used. The field should be filled in with the country of storage of the data otherwise.</p> <p>Please also refer to DORA Q&amp;A 143.</p>
62	Populating the register	<p>The Register of Information ITS require ICT service providers to confirm the “B_02.02.0150 - Location of the data at rest (storage)” and “B_02.02.0160 - Location of management of the data (processing)”. Are ICT service providers required to populate these fields for:</p> <ul style="list-style-type: none"> <li>• direct ICT third-party service providers;</li> <li>• all subcontractors; and</li> <li>• all ultimate parent undertakings of the ICT third-party service providers?</li> </ul>	<p>The obligation of filling the Rol is for financial entities not ICT third-party service providers. B_02.02.0150 and B_02.02.0160 refers to the location of the data and processing of the data of the FEs (not the data of the potential other clients of the ICT service provider). Depending on how the ICT service provider is hosting and processing the data it could be manage directly by the direct ICT third-party service providers or by its potential subcontractor. However, this level of granularity on who is hosting and processing is not required by the Rol but only the location. It focuses on the operational aspect of provision of the ICT service.</p>

##	Category	Question	Answer
63	Populating the register	How to report data field B_02.02.0160 where the ICT service is not based on or does not foresee data processing?	<p>According to the data model (<a href="#">Data Model for DORA RoI.pdf</a>), data field B_02.02.0160 is marked as a primary key value. As result it should not be missing or reported empty. The option 'Not Applicable' was added to the closed set of options. If the ICT service is not based / does not foresee data processing, then the option 'Not Applicable' should be used. The field should be filled in with the country of data processing otherwise.</p> <p>Please also refer to DORA Q&amp;A 144.</p>
64	Populating the register	How to report data field B_04.01.0040 if the financial entity is not a branch?	<p>According to the data model (<a href="#">Data Model for DORA RoI.pdf</a>) data field B_04.01.0040 is marked as a primary key value. As result it should not be missing or reported empty. The field should be filled in with 'Not Applicable' if the financial entity is not a branch (i.e., option 2 is selected in B_04.01.0030).</p> <p>Please also refer to DORA Q&amp;A 145.</p>
65	Populating the register	How to report data field B_05.02.0060 if the ICT third-party service provider is a direct provider (rank =1)?	<p>According to the data model (<a href="#">Data Model for DORA RoI.pdf</a>) data field B_05.02.0060 is marked as a primary key value. As a result it should not be missing or reported empty. If the ICT third-party service provider (field B_05.02.0030) is a direct ICT third-party service provider i.e. at 'rank' r = 1 (field B_05.02.0050), field B_05.02.0060 should be filled in with the same value reported in B_05.02.0030.</p> <p>Please also refer to DORA Q&amp;A 147.</p>
66	Populating the register	In the register an ICT service provider can only be linked to one function. How can an ICT service provider be mapped to multiple functions?	<p>ICT TPPs could be linked to multiple functions and ICT services, by adding a different entry (row) for each function.</p>

##	Category	Question	Answer
67	Populating the register	Referring to B_02.02.0170 - How to define the data sensitivity?	Financial entities should define the data sensitivity internally as it is relative to the business of the financial entity. The financial entity could provide explanation or description on how it assesses the data sensitivity in template B_99.01.
68	Populating the register	In relation to column B_02.02.0020, multiple entities often make use of a contract; in such case, should the data be split to multiple rows? The same question applies to other data points which can result in multiple entries. For example, in column B_02.02.0060	In case of multiples entities making use of the same contract, financial entities should add additional rows to reflect this situation in the register of information.
69	Populating the register	If an ICT service provider is not identified by the financial entities as providing ICT services supporting critical or important functions, should it be still included into the register?	Yes, DORA Article 28(3) requires the financial entities to maintain and update a register of information in relation to all contractual arrangements on the use of ICT services provided by ICT third-party service providers, so all such providers should be identified in template B_05.01.
70	Intra-group service providers	What type of ICT TPPs need to be reported in template B_05.02?	<p>Template B_05.02 should contain records of all covering the ICT service supply chain shall include, where applicable:</p> <ul style="list-style-type: none"> <li>a) all direct ICT third-party service providers;</li> <li>b) all ICT intragroup service providers;</li> <li>c) for the ICT services supporting a critical or important function or material part thereof, all subcontractors that effectively underpin the provision of those ICT services (i.e. all the</li> </ul>

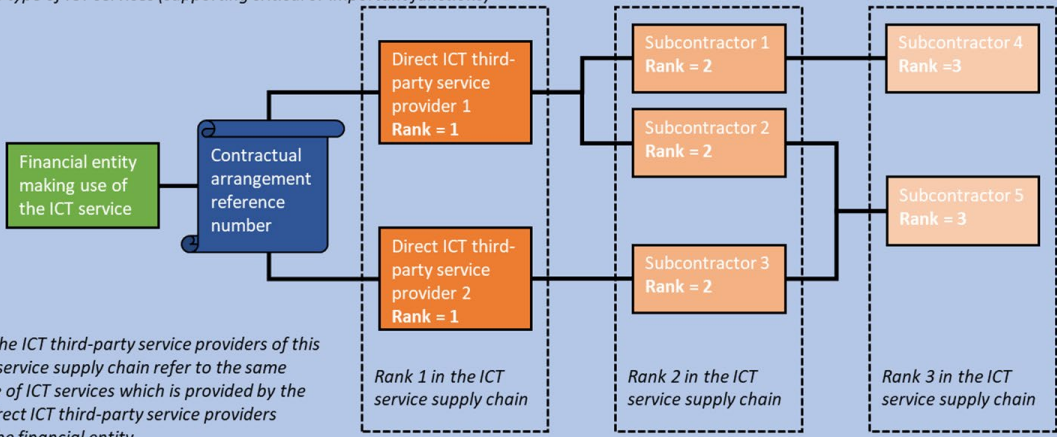


##	Category	Question	Answer
			<p>subcontractors providing ICT services whose disruption would impair the security or the continuity of the service provision);</p> <p>d) where an ICT intragroup service provider uses subcontractors to provide their ICT services to the financial entity, at least the first extra-group subcontractor even if the ICT services provided do not support a critical or important function or material parts thereof.</p> <p>However, first all of these entities need to be identified in template B_05.01 in accordance with the instructions to that template.</p> <div data-bbox="1025 742 2152 1305" style="border: 1px solid black; padding: 10px;"> <p><b>ICT service supply chain</b> (listing the subcontractors that effectively underpin ICT services supporting critical or important functions)</p> <p>The ICT service supply chain is identified by the combination of both:</p> <ul style="list-style-type: none"> <li>- the contractual arrangement reference number between the financial entity and the direct ICT third-party service providers;</li> <li>- the type of ICT services (supporting critical or important functions)</li> </ul> <pre> graph LR     FE[Financial entity making use of the ICT service] --- CAR[Contractual arrangement reference number]     CAR --- D1[Direct ICT third-party service provider 1 Rank = 1]     CAR --- D2[Direct ICT third-party service provider 2 Rank = 1]     D1 --- S1[Subcontractor 1 Rank = 2]     D1 --- S2[Subcontractor 2 Rank = 2]     D2 --- S3[Subcontractor 3 Rank = 2]     S1 --- SC4[Subcontractor 4 Rank = 3]     S1 --- SC5[Subcontractor 5 Rank = 3]     S2 --- SC4     S2 --- SC5     S3 --- SC4     S3 --- SC5     </pre> <p>All the ICT third-party service providers of this ICT service supply chain refer to the same type of ICT services which is provided by the 2 direct ICT third-party service providers to the financial entity</p> <p>Rank 1 in the ICT service supply chain</p> <p>Rank 2 in the ICT service supply chain</p> <p>Rank 3 in the ICT service supply chain</p> </div>

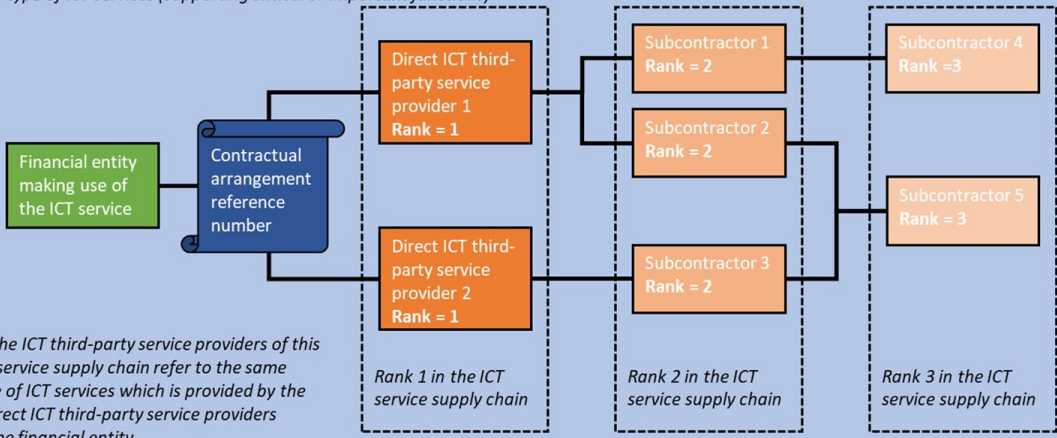
##	Category	Question	Answer
71	Intra-group service providers	<p>If an unlicensed group service company signs the TPP ICT services contracts and then has a contract with the Group re/insurance undertakings to provide the ICT services, should this be considered as intra-group outsourcing or signing the contracts on behalf of the entities using services?</p> <p>Is it mandatory to report all contractual arrangement for the use of ICT services provided by the same ICT TPP (including intragroup provider)?</p>	<p>Article 30(1) of DORA reads <i>'The rights and obligations of the financial entity and of the ICT third-party service provider shall be clearly allocated and set out in writing. The full contract shall include the service level agreements and be documented in one written document which shall be available to the parties on paper, or in a document with another downloadable, durable and accessible format.'</i></p> <p>The RoI templates explicitly request to report for each contract the entities signing the contract, the ICT third-party service provider providing the ICT services and the financial entities making use of the ICT services. In case of multiple relations, additional row should be added.</p>
72	Intra-group service providers	Does the RoI have to include the intra-group ICT service providers?	Yes, the RoI templates should include cases where financial entities make use of ICT services provided by intra-group ICT service providers.
73	Intra-group service providers	Should intra-group arrangements also be included in in template B_02.01, or should these be exclusively reported in B_02.03?	All contracts should be reported in template B_02.01, including intra-group arrangements. All reference numbers of the contractual arrangements reported in B_02.03 for the intra-group arrangements should also be reported in B_02.01.
74	Intra-group service providers	Should a financial entity list the main intra-group contract or the contract with the external third party in the supply chain in template B_02.03?	<p>Both the main intra-group contract and the contract with the external ICT TPP should be reported in template B_02.01:</p> <ul style="list-style-type: none"> <li>Field B_02.03.0010 should be filled in with the reference number of the contractual arrangement reference number of the contractual arrangement between the entity making use of the ICT service(s) provided and the ICT intra-group service provider (main intra-group contract).</li> </ul>

##	Category	Question	Answer
			<ul style="list-style-type: none"> <li>Field B_02.03.0020 should be filled in with the contractual arrangement reference number of the contractual arrangement between the ICT intra-group service provider of the contractual arrangement in B_02.03.0010 and its direct ICT third-party service provider (contract with external third party and the intra-group provider).</li> </ul> <h3>2 subcontracting chains: intra-group and extra-group</h3> <p>Intra-group = Template B_02.03 Extra-group = Template B_05.02</p> <p>Non ICT service specific i.e. only chain of contractual arrangements Contracts C1, C2 and C3 are linked</p> <p>Intra-group supply chain reported in Template B_02.03</p> <p>Structure of the subgroup</p> <p>Type of ICT service specific i.e. for a same contract (here C4) 1 same type of ICT services = 1 ICT service supply chain</p> <p>ICT service supply chain reported in Template B_05.02</p> <p>For readability purpose, the ICT intra-group service provider D is not included in the ICT service supply chain in the illustration although it shall be the case in the Template B_05.02</p>
75	Branches	Are branches considered as financial entities?	<p>Branches are not financial entities but are part of the financial entities that are their head office.</p> <p>Please also refer to FAQ 50 for more details.</p>

##	Category	Question	Answer
76	Branches	What to report in template B_01.03 if the financial entity does not have branches?	If the financial entity (or its group) does not have branches, then there is no need to fill in template B_01.03. This empty template still needs to be reported to the ESAs.
77	Intra-group service providers	Are entities, established in third-countries and providing ICT services to financial entities that are part of the same group, ICT intra-group service providers?	If entities that are part of the group but are registered outside the Union provide ICT services to a Union based financial entity within the same group, they should be considered as intra-group ICT TPP and treated in the register of information accordingly.
78	Intra-group service providers	How shall the financial entity at the top of the group be treated in the consolidated information register, if they are providing all the ICT services to the financial entities of the sub-group? In fact, all the information would be integrated in the consolidated template multiple times (for each subsidiaries using the ICT services provided by the same ultimate parent)	A parent providing ICT services to financial entities in the group should be treated as an intra-group service provider. Since the consolidated register also needs to include arrangements from the perspective of the entities using the services, separate entries for all entities covered by the arrangements should be reported.
79	Supply chain	Which type of ICT TPPs are to be reported in the ICT service supply chain?	Please refer to Recital (6) and Article 3(6) of ITS on registers of information (Regulation EU 2024/2956). Not all subcontractors are to be reported but only those subcontractors that effectively underpin ICT services supporting critical or important functions or material parts thereof, including all the subcontractors providing ICT services whose disruption would impair the security or the continuity of the service provision. When identifying those subcontractors, financial entities should consider business and ICT service continuity and ICT security aspects.

##	Category	Question	Answer
			<p><b>ICT service supply chain</b> (listing the subcontractors that effectively underpin ICT services supporting critical or important functions)</p> <p>The ICT service supply chain is identified by the combination of both:</p> <ul style="list-style-type: none"> <li>- the contractual arrangement reference number between the financial entity and the direct ICT third-party service providers;</li> <li>- the type of ICT services (supporting critical or important functions)</li> </ul>  <p>All the ICT third-party service providers of this ICT service supply chain refer to the same type of ICT services which is provided by the 2 direct ICT third-party service providers to the financial entity</p> <p>Rank 1 in the ICT service supply chain</p> <p>Rank 2 in the ICT service supply chain</p> <p>Rank 3 in the ICT service supply chain</p>
80	Supply chain	Is there a limitation in the rank of subcontractor in the ICT service supply chain?	No, there is no theoretical limit in the rank of an ICT third-party service provider in a ICT service supply chain.
81	Supply chain	The information on the ICT service supply chain (B_05.02), makes reference to the ICT third-party service provider and the recipient of sub-contracted ICT services. What does it mean?	The recipient is the ICT third-party service provider at rank n-1 and the subcontractor providing service is then at rank n.

##	Category	Question	Answer
82	Supply chain	What is the meaning of the rank of a ICT TPP within the ICT service supply chain?	Rank in the ICT service supply chain refers to the position of an ICT service provider within the ICT service supply chain (irrespective whether some ICT service providers are intra-group or not). It does not refer to group structure of financial entities.
83	Supply chain	How to classify a service which belongs to multiple types of ICT services? E.g. SaaS service which also provides ICT security services	Each financial entity has to assess to which type of ICT services a specific service belongs. In case an ICT service provider is providing multiple ICT services within a same contractual arrangement to one or more financial entities, additional rows should be added in the corresponding templates to reflect this situation.
84	Supply chain	Could ICT intra-group service providers be a subcontractor in an ICT service supply chain?	Subcontractors could be intra or extra group.
85	Supply chain	Is it correct that a supply chain (identified by the contractual arrangement number and the ICT type of service) is composed by only direct/sub-contractors sharing the ICT Service type? If so, how should a supply chain of a SaaS service be built, where sub-contractors may be IaaS/PaaS sub-contractors?	<p>The ICT service supply chain is defined by the following:</p> <ul style="list-style-type: none"> <li>• The contractual arrangement reference number between the financial entity and the direct ICT TPP (rank 1 in the ICT service supply chain);</li> <li>• The 'ICT service' provided by the direct ICT TPP, if the ICT service is supporting a critical or important function or material part thereof;</li> <li>• All relevant subcontractors that effectively underpin the provision of the ICT service (i.e. all the subcontractors providing ICT services whose disruption would impair the security or the continuity of the service provision).</li> </ul>

##	Category	Question	Answer
			<p><b>ICT service supply chain</b> (listing the subcontractors that effectively underpin ICT services supporting critical or important functions)</p> <p>The ICT service supply chain is identified by the combination of both:</p> <ul style="list-style-type: none"> <li>- the contractual arrangement reference number between the financial entity and the direct ICT third-party service providers;</li> <li>- the type of ICT services (supporting critical or important functions)</li> </ul>  <p>All the ICT third-party service providers of this ICT service supply chain refer to the same type of ICT services which is provided by the 2 direct ICT third-party service providers to the financial entity</p> <p>Rank 1 in the ICT service supply chain</p> <p>Rank 2 in the ICT service supply chain</p> <p>Rank 3 in the ICT service supply chain</p>
86	Populating the register	Regarding the ICT supply chain, in the case of a Temporary Joint Venture (TJV), should the leading company or all the participating companies be reported In the RoI?	The identifiers of all the actual ICT TPP that are part of the ICT service supply chain should be reported (even in case of temporary joint-venture). Information on the owners of the joint-venture are to be reported in template B_05.01.
87	Populating the register	When RTO and RPO are defined for ICT services supporting several functions instead of one function, would it need to be the RTO/RPO of the service with the longest RTO/RPO to be reported?	<p>It is for the financial entities to assess which RPO and RTO is relevant for the functions according to article 12(6) of DORA. RTO and RPO are defined for the functions in the Register of Information.</p> <p>Therefore, when a same ICT service is supporting several functions, the RTO/RPO of the service should comply with the shortest RTO/RPO of the functions supported.</p>

##	Category	Question	Answer
88	Populating the register	What audit types are identified to fill in B_07.01.0070?	<p>The type of audit could be:</p> <ul style="list-style-type: none"> <li>(i) the internal audit department or any other additional qualified personnel of the financial entity,</li> <li>(ii) a joint team together with other clients of the same ICT third-party service provider (“pooled audit”), or</li> <li>(iii) a third party appointed by the supervised entity to audit the service provider.</li> </ul>
89	Populating the register	What are the objective of template B_02.03?	<p>The objective of this template is to link one intra-group contractual arrangement to another intra-group one. For example: Entities A, B and C are part of the same financial group. Entity A is contracting with Entity B (contract 1) and Entity B is contracting with Entity C (Contract 2) and Entity C is the subcontractor of Entity B for the ICT service used by Entity A. In this case, the template B_02.03 will contain one row linking Contract 1 and Contract 2.</p> <h3 style="text-align: center;">2 subcontracting chains: intra-group and extra-group</h3> <p><b>Intra-group = Template B_02.03</b>  <b>Extra-group = Template B_05.02</b></p> <p><i>Non ICT service specific i.e. only chain of contractual arrangements Contracts C1, C2 and C3 are linked</i></p> <p><i>Intra-group supply chain reported in Template B_02.03</i></p> <p><i>Type of ICT service specific i.e. for a same contract (here C4) 1 same type of ICT services = 1 ICT service supply chain</i></p> <p><i>ICT service supply chain reported in Template B_05.02</i></p> <p>For readability purpose, the ICT intra-group service provider D is not included in the ICT service supply chain in the illustration although it shall be the case in the Template B_05.02</p>



##	Category	Question	Answer
90	Contractual arrangements	How do the types of contractual arrangements for the RoI (standalone/framework/subsequent or associated agreements) fit with the requirement of "one written document"?	It depends on the structure of the contract set between the financial entity and the ICT TPP, for example, they have to indicate if the contract is standalone or a waiver or a complement to a master contract
91	Populating the register	For a small and interconnected firm, would it be admissible that none of the functions are deemed essential? or you expect that every bound entity has at least one or more functions classified as essential for the purposes of DORA?	It is up to each financial entity to assess which of their functions are deemed important or critical functions, based on the definition of Article 3(22) of DORA.
92	Populating the register	For the field B_01.02.0070 (Date of last update) what exactly the last update date means and how to calculate it?	The date of last update is the date of last modification of the relevant entry in the register of information.
93	Populating the register	Should standard criteria be used to define a critical or important function? if so, what are they?	Financial entities should determine which of its functions are critical or important based on its own assessment and/or applicable sectoral regulations, and in accordance with the definition of Article 3(22) of DORA.
94	Populating the register	What does "on an ongoing basis" mean in definition of ICT services in DORA article 3(21)? What are the drivers that can support us to identify "on an ongoing basis"?	Only ICT services provided on an ongoing basis are considered; therefore, a one-time purchased ICT service (a single, static solution) without ongoing maintenance, support, or updates is not considered.

##	Category	Question	Answer
95	Populating the register	Regarding the template B_02.01.0020, what does overarching arrangement mean?	The overarching arrangement reflects the structure of the contract set between the financial entity and the ICT TPP, and it would indicate if the contract is standalone or a waiver or a complement to a master contract. Overarching arrangement correspond for example to master or framework contractual arrangement.
96	Populating the register	Should all financial entities of a given group using the services of the same contractual arrangement be listed in the template B_04.01?	Yes.
97	Populating the register	How to fill in B_05.02.0030 that requires s "Identification code of the ICT third-party provider" instead of sub-provider?  How to populate the columns b_05.02.0030 and b_05.02.0060? What is the link between them?	The column B_05.02.0030 requests the identifier of the direct ICT TPP or that of the subcontractors. Subsequently, column B_05.02.0050 requests the rank (1 for the direct ICT TPP, higher number for subcontractors).  Also, column B_05.02.0060 requests the identifier of the recipient of the service of the ICT TPP (or subcontractor) identified in column B_05.02.0030.  All those columns are required to link the ICT TPP to each other in the ICT service supply chain.
98	Populating the register	In the template B_02.02, about the legal entities making use of the service, is it necessary to list all the providers, including those that did not sign the agreement but use only the services?	Yes, but normally there should always be a contractual arrangement between the entity making use of the ICT service and its provider.

##	Category	Question	Answer
99	Populating the register	How to fill in B_05.01.0110 if the ICT third-party service provider does not have any parent undertaking as it is not part of any group?	Where the ICT third-party service provider is not part of a group, the identification code used to identify that ICT third-party service provider in B_05.01.0010 shall be repeated also in this data field. This would ensure that the data field is not left empty. Otherwise the empty data field will be picked in data quality checks and this will be included in the data quality feedback to the submitter.
100	Populating the register	In B_01.02.0050, how to deal with entities that fulfil more than one given criteria? An entity can be "subsidiary" & "parent other than ultimate parent" & "outsourcing" at the same time.	The higher level should be selected, which is in this case: "parent other than ultimate parent". In case of outsourcing, it means the entity does not belong to the group so it cannot be at the same time a parent entity and an external entity.
101	Populating the register	How to populate template B_01.02 if financial entity reports on an individual basis, should this template be left empty?	If financial entity report on an individual basis and there is no other financial entities belonging to the same group, then template B_01.02 should contain only one entry related to this reporting financial entity. Template B_01.02 cannot be left empty in any scenarios.
102	Populating the register	How to populate template B_01.02 if the financial entity reports is a part of a third-country group, but does not have any parent undertaking in the EU?	If the financial entity belongs to a third-country group and does not have a parent undertaking in the EU, it would report the register on an individual basis and then the template B_01.02 should contain only one entry related to the reporting financial entity. There is no need to report other financial entities of the third-country group that are not the subsidiaries of the reporting entity (e.g. other entities of the group in another EU Member States or third countries). If such entities are offering ICT services to the reporting financial entity, they would need to be treated as intra-group service providers and reported in template B_05.01.
103	Populating the register	For the : "Identify the ISO 3166–1 alpha–2 code of the country in which the global operating headquarters of ICT third-party Service Provider (SP) are located." If there is a contract with an ICT TPP in	All ICT TPPs are to be listed in template B_05.01 where information in relation to the ultimate parent undertaking is requested

##	Category	Question	Answer
		one EU country (that has a parent company based in USA), does the entity based in the USA need to be reported?	
104	Populating the register	In all the cases where the currency is required, could the euro be used as the currency always to be adopted or is it mandatory to indicate the currency indicated in the contract?	The currency is always in relation to a specified column. Depending on the currency used to express the amount, the relevant currency should be reported.
105	Populating the register	Will be more detail and context on the 19 DORA ICT service types be provided to support the correct selection? How to deal if a contract covers more than 1 services?	FE could refer to the description provided in the annex listing the different category of ICT services. In case of multiple ICT services for a same contractual arrangement, additional rows shall be added accordingly.
106	Populating the register	For a given ICT service, do we report on a consolidated, per contract/Master service agreement (MSA) basis? Or for each Statement of Work/Order form separately. For example: One software service, one contract, 5 order forms/statements of work - do we need to report 5 lines or 1?	The FE is to assess which level of granularity is the most appropriate when filling in the template.  When same FEs are making use of the same ICT services at a MSA level it may be more relevant to report at MSA level (overarching agreement). When some specificities need to be considered at a more granular level (order form) for one specific FE or ICT service, it may be more relevant to consider filling in at the order form level in this specific case.
107	Populating the register	If financial entity uses an ICT reseller to purchase an ICT software, how this relationship should be recorded in the RoI?	If the reseller is not providing the ICT service on an ongoing basis, it should not be considered as an ICT TPP.
108	Populating the register	In case of a Group, is there a need to aggregate information in a unique file, is it possible to have a version of the file where it is possible to do copy and paste of multiple rows?	The RoI at consolidated level is the 'sum' of the RoI at entity level of the subsidiaries composing the group, therefore, it is expected to retrieve all the information at entity level in the RoI at consolidated level.

##	Category	Question	Answer
			From data management perspective, every row is different from each other. However, it is possible to have row that are very similar with only a difference in one column.
109	Populating the register	Criticality or importance assessment: there is no explanation for the 3 options, or where can they be found?	The assessment of criticality or importance of a function rely on the FEs sectoral regulation where applicable and/or its own judgement.
110	Populating the register	Should direct ICT service providers be the single ones considered or also third-party providers providing services through ICT system? In this second case is it necessary to include the ICT service in the main contract?	The ICT service supply chain (i.e. the direct ICT and the relevant subcontractors that effectively underpin the provision of the ICT service supporting a critical function or a material part thereof) are to be reported only when a critical or important function is supported by the ICT service.
111	Populating the register	In case of one contract with two services of the same type of service, can only one row be reflected in the register?	Yes. The importance is not the quantification of the ICT service but the category.
112	Populating the register	What is the expected level of granularity for the Functions identified in B_06.01?	Each financial entity is to assess which level of granularity is the most appropriate.
113	Populating the register	It is specified that in order to report the ICT service supply chain in terms of subcontractors it should be adopted a risk-based approach. How should this approach be implemented?	In relation to the ICT services supporting a critical or important function or material part thereof, the register of information includes all subcontractors that effectively underpin the provision of these ICT services (i.e. all the subcontractors providing ICT services whose disruption would impair the security or the continuity of the service provision). In case an ICT intragroup service provider makes use of subcontractors to provide their ICT services to the financial entity, at least the first extra-group subcontractor even if the ICT services provided do not support a critical or important function or material part thereof.
114	Populating the register	Does the field “B_05.01.0050 - Country of the ICT third-party service provider’s headquarters Country” refer to the country of tax residence?	Usually, the country of establishment of the entity is the country of tax residence.

##	Category	Question	Answer
115	Populating the register	In B_01.02.0110 is it possible for the financial entities to provide a best estimate of the value of the total assets of a financial entity?	This information is instrumental for CTPP designation. Therefore, it is expected that each financial entity to be able to determine their own total assets values.
116	Populating the register	How to report in B_02.02.0050 several Functions supported by the same suppliers?	If a same contractual arrangement (in B_02.02.0010) and same ICT TPPs (either intragroup or external ICT TPPs) in B_02.02.0030 is related to multiple functions (also the same approach for ICT services), an additional row should be added for each function.
117	Populating the register	How to report in case where the provision of ICT services is done across several countries?	In case of provision of service across multiple countries, an additional row should be added for each country. However, when introducing additional row, financial entity should be conscious of not duplicate key values as duplicative key values will trigger referential integrity data quality checks.
118	Populating the register	B_02.02.0150 - Location of the data at rest (storage). Would it be possible to have "EU" answer option for the data storage? Many providers do not give more precisions regarding the EU-country where the data is located.	No, it is not possible to choose regions from the list of available option. If a specific country is not know, or not available from the contract documentation, then the closest and most relevant country will need to be chosen, in the example of the questions – one of the most relevant for the contract EU Member States.
119	Populating the register	If a TPP has more than one parent, how is this supposed to be entered? From the validation rules, it would trigger an error for duplicate keys, since the rest of the values would be identical.	When filling the register, financial entities are required to provide identification of the ultimate parent undertaking for the ICT TPP at the highest level. For instance, GLEIF provides information on the ultimate parent undertaking and the direct parent undertaking (if applicable): in this case, the former identification code should be used. Due to the data modelling constraints, it is not possible to report two entities as parent undertakings.
120	Populating the register	Does 'legal name' in template B_05.01 have to match that reported in GLEIF or BRIS?	The ITS on the register of information specifies that the legal name of the ICT third-party service provider as registered in business register should be used to fill in the field B_05.01.0050. The alphabet reported in the business register should be used, and the same name in Latin alphabet should be reported in template B_05.01.0060.
121	Populating the register	Regarding template B_06.01.0020 what is the exact definition of licenced activity? Does the entity need a specific licence or is it more a question of the main business areas?	Licenced activity refers to the activities that financial entities are entitles to perform in accordance to the sectoral legislation. The complete list of licenced activities based on Annex II of the ITS and their codes is available here <a href="https://www.eba.europa.eu/sites/default/files/2025-01/b88793ec-9656-4512-a2a1-a41194058d51/ITS%20on%20RoI%20-">https://www.eba.europa.eu/sites/default/files/2025-01/b88793ec-9656-4512-a2a1-a41194058d51/ITS%20on%20RoI%20-</a>

##	Category	Question	Answer
			<a href="#">%20Annex%20%20list%20of%20licensed%20activities%20for%20data%20point%20model%20%28updated%20to%20reflect%20DPM%204.0%29.xlsx</a>