

EBA/ITS/2026/01

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## Final Report

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Final draft Implementing Technical Standards  
on the supervisory reporting of Third Country  
Branches under the minimum harmonisation  
regime of Directive 2013/36/EU

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# 1. Executive Summary

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The latest amendment to the CRD (Directive (EU) 2024/1619, also known as CRD VI), has introduced a new framework for third-country branches (TCBs). Under this TCB regime, CRD VI outlines, in Article 48k, the regulatory and financial information that TCBs must periodically report to their competent authorities (CAs). Additionally, Article 48l(1) of the CRD mandates the European Banking Authority (EBA) to develop draft implementing technical standards (ITS) to define uniform formats, definitions, and reporting frequencies for these requirements. While some of these reporting obligations are not entirely new – having already been included in Directive (EU) 2019/878 (CRD V) – CRD VI introduces new elements. These include requirements for TCBs to report information about their head undertakings (HU), as well as details on originated assets and liabilities.

This final report puts forward the draft ITS, proposing two sets of templates: information requirements concerning the TCBs themselves (Annex I) and information requirements regarding their HU (Annex II). In both cases, the entities obligated to report are always the supervised TCBs. Proportionality is addressed through the ‘core + supplement approach’ applied to Class 1 and Class 2 TCBs, with a core set of data points applicable to all TCBs and additional information required only for those classified as Class 1.

Member States (MS) that invoke Article 48a(4) of the CRD, hence applying to their third-country TCBs the same requirements as those applicable to credit institutions authorised under the CRD, are still expected to address any information gaps by requesting to their TCBs the necessary templates proposed in this ITS (or specific data points within them).

Following the consultation, a series of simplifications and enhancements have been introduced to improve clarity, proportionality, and operational feasibility. Key changes include postponing the initial reporting date to 31 March 2027, extending remittance deadlines, and revising the HU-related provisions. Templates were streamlined by reducing duplication, simplifying instructions, and narrowing scope. Practical guidance and examples were added to support implementation. Collectively, these adjustments simplify the framework while preserving supervisory integrity and comparability.

## **Next steps**

After the submission of the final draft ITS to the Commission for adoption, and publication of the final report and IT tools, including binding instructions on our website, the EBA will develop the data point model (DPM), XBRL taxonomy and validation rules based on the final draft ITS. This technical package will be published as a draft in Q1 2026, while the final technical package is expected to be published in Q2 2026. The first reference date for the application of this ITS is foreseen for 31 March 2027; hence, granting a one-year implementation period for the proposed changes. The instructions will be translated into the official EU languages and published on the EBA website as part of the ITS IT solutions.

## 2. Background and rationale

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1. One of the main tasks of the EBA is to contribute, through the drafting of binding Technical Standards (BTS) and Guidelines, to the creation of the European Single Rulebook in banking. The Single Rulebook aims at providing a single set of harmonised prudential rules for financial institutions throughout the EU, helping create a level playing field and providing high protection to depositors, investors and consumers. As part of this Single Rulebook for Banking in Europe, this draft ITS represents a crucial new milestone in the field of supervisory reporting in Europe by setting out harmonised reporting requirements to TCBs.
2. Pursuant to the mandate set out in Article 48l(1) of the CRD, the EBA has developed the draft ITS, which specify IT solutions (templates and instructions), standardised in formats, frequencies and definitions for the purpose of the regulatory and financial information to be periodically reported by TCBs.
3. Reporting required under Article 48l of the CRD shall therefore be done in accordance with the formats, frequency and IT solutions specified in these ITS. While the formats and frequencies as specified in the ITS will be published in the legal act in the EU Official Journal upon finalisation and adoption by the European Commission, the instructions, that are part of the IT solutions, will be published in the EBA website instead, and will be equally binding.

### 2.1. New banking regulatory package

4. In June 2024, Directive (EU) 2024/1619 amending Directive 2013/36/EU (CRD VI) and Regulation (EU) 2024/1623 amending Regulation (EU) No 575/2013 (CRR 3) were published in the EU Official Journal (OJ) – both necessary for the implementation of the Basel III post-crisis regulatory reforms published by the Basel Committee on Banking Supervision (BCBS) in December 2017, while considering the specific aspects of the EU's banking sector.
5. The banking package introduces several key innovations to the prudential framework for credit institutions. Firstly, it incorporates the final components of the Basel III framework, ensuring a level playing field at the international level, while considering the unique characteristics of the EU's banking sector. Additionally, it supports the green transition by introducing new rules that require banks to systematically identify, disclose, and manage risks related to environmental, social, and governance (ESG) factors as part of their risk management processes. Moreover, the banking package strengthens enforcement tools available to supervisors overseeing EU banks, with the aim of ensuring sound management and safeguarding financial stability. Finally, it establishes a new regulatory regime applicable to TCBs.
6. The introduction of the TCB regime was driven by the need to address the growing volume of activities conducted by TCBs and the regulatory fragmentation across the EU. In response to these challenges, the EBA's 2021 Report on the treatment of TCBs under the national law of MS,

addressed to the European Parliament, the Council, and the Commission, provided high-level policy recommendations aimed at further harmonising EU law<sup>1</sup>. The report also outlined supervisory practices and offered a detailed mapping of the TCBs operating within the MS. These recommendations paved the way for the inclusion of TCB-related requirements in the CRD. As a result, Article 1(13) of the CRD introduced a harmonised regulatory framework for TCBs, including minimum regulatory requirements.

7. This framework is designed to enable the effective supervision of TCBs and provide a comprehensive overview of the activities of the third-country groups within the Union, including common supervisory and financial reporting. Pursuant to Article 48l(1) of the CRD, the EBA was tasked with developing draft ITS that establish standardised templates for reporting requirements. The EBA remains committed to the timely and accurate implementation of the banking package. In this context, these ITS introduce a new reporting framework for TCBs, derived from the requirements and mandate set out in the CRD. This framework encompasses financial and prudential data related to the TCBs themselves, as well as additional information concerning the head undertaking.

## 2.2. Overview of the mandate and general remarks

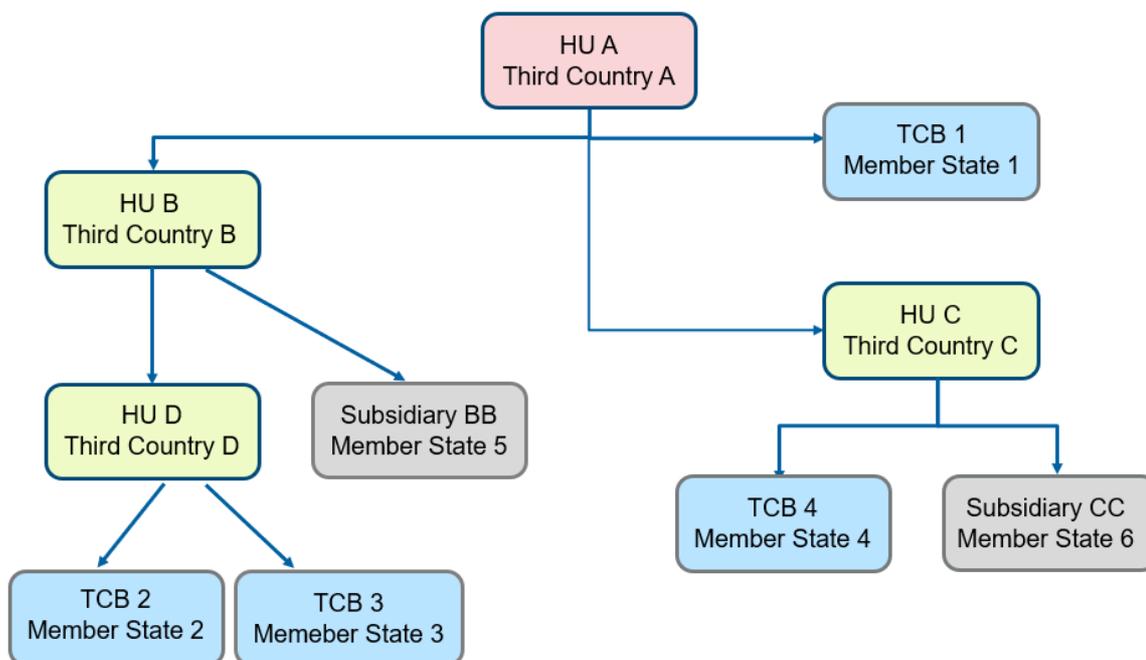
8. While Article 48l of the CRD provides the mandate for the EBA to develop this draft ITS, Article 48k of the CRD specifies the reporting requirements, detailing the information to be submitted at the branch level (paragraph 1) and regarding the head undertaking (paragraph 2). The ITS address the reporting requirements outlined in Article 48k(1) through Annex I (templates) and related instructions, while the requirements under Article 48k(2) are addressed in Annex II (templates) and its related instructions.
9. Article 47(3) of the CRD defines a head undertaking as ‘an undertaking which has its head office in a third country and which has established a TCB in the Member State, and the intermediate or ultimate parent undertakings of that undertaking, as applicable’. Consequently, the templates required under Article 48k(2), points (b) to (f) of the CRD included in Annex II, may need to be submitted for more than one head undertaking.
10. For the aggregation of the total assets and liabilities of the third-country group (TCG) within the Union, as required under point (a) of Article 48k(2) of the CRD, the TCG shall be assessed at the level of the ultimate head undertaking of that group.
11. The example below illustrates (a part of) a hypothetical TCG that holds assets and liabilities within the Union through multiple subsidiaries and branches. In this scenario, the head undertaking A serves as the direct head undertaking of TCB 1. Head undertaking D acts as the direct head undertaking of TCB 2 and TCB 3. Head undertaking C is the direct head undertaking of TCB 4. Head undertaking B functions as the intermediate head undertaking of TCB 2 and of

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<sup>1</sup> [https://www.eba.europa.eu/sites/default/files/document\\_library/Publications/Reports/2021/1015664/Report%20on%20third%20country%20branches.pdf](https://www.eba.europa.eu/sites/default/files/document_library/Publications/Reports/2021/1015664/Report%20on%20third%20country%20branches.pdf)

TCB 3. This structure demonstrates the hierarchical relationships within the TCG, with head undertaking A being the ultimate head undertaking of the group in the Union.

Figure 1 - Example for a TCB group



### 2.2.1. Correspondence between CRD V and CRD VI reporting requirements

12. Not all the requirements under Article 48k of the CRD are entirely new. Some of them have been developed based on the requirements already established in Article 47(1a) of the CRD V. The table below highlights the correspondence between the reporting requirements outlined in CRD V and those specified in CRD VI.

Table 1 - Correspondence between the reporting requirements outlined in CRD V and those specified in CRD VI

CRD V	CRD VI
<b>Article 47.1a.(a):</b> the total assets corresponding to the activities of the branch authorised in that Member State	<b>Article 48k.1(a):</b> the assets and liabilities held on their books in accordance with Article 48h
<b>Article 47.1a.(b):</b> information on the liquid assets available to the branch, in particular availability of liquid assets in Member State currencies	<b>Article 48k.1(b):</b> the third-country branches' compliance with the requirements that apply to them under this Directive, <b>Article 48f:</b> liquidity requirements

<b>Article 47.1a.(c):</b> the own funds that are at the disposal of the branch	<b>Article 48k.1(b):</b> the third-country branches' compliance with the requirements that apply to them under this Directive, <b>Article 48e:</b> minimum capital endowment requirement
<b>Article 47.1a.(d):</b> the deposit protection arrangements available to depositors in the branch	<b>Article 48k.1(c):</b> on an ad hoc basis, the deposit protection arrangements available to depositors in the third-country branches in accordance with Article 15(2) and (3) of Directive 2014/49/EU of the European Parliament and of the Council
<b>Article 47.1a.(g):</b> the recovery plans covering the branch	<b>Article 48k.2(d)</b> the recovery plans of the head undertaking and the specific measures that could be taken on the third-country branches in accordance with those plans, and any subsequent updates and amendments to those plans
<b>Article 47.1a.(h):</b> any other information considered by the competent authority necessary to enable comprehensive monitoring of the activities of the branch	<b>Article 48k.1(d):</b> additional regulatory requirements imposed on the third-country branches by Member States under national law

13. Conversely, some requirements in Article 48k of the CRD are entirely new. This applies particularly to most of the information that TCBs are required to report regarding their HU, as detailed in the table below. It also includes the reporting of assets and liabilities originated by the TCB:

*Table 2 - Newly introduced reporting requirements in CRD VI*

<b>Article 48k.1(a):</b> the assets and liabilities originated by the TCB, as well as breakdowns on (booked) assets and liabilities that single out: (i) the largest recorded assets and liabilities classified by sector and counterparty type, including, in particular, financial sector exposures, (ii) significant exposure and funding source concentrations to specified types of counterparties, (iii) significant internal transactions with the head undertaking and with members of the head undertaking's group
<b>Article 48k.2(a):</b> aggregated information on the assets and liabilities held or booked, respectively, by the subsidiaries and other TCBs of that HU's group in the Union
<b>Article 48k.2(b):</b> the HU's compliance with the applicable prudential requirements on an individual and consolidated basis
<b>Article 48k.2(c):</b> significant supervisory reviews and assessments, when those are conducted on the HU, and the consequent supervisory decisions
<b>Article 48k.2(e):</b> the HU's business strategy in relation to the TCB and any subsequent changes to that strategy
<b>Article 48k.2(f):</b> the services provided by the HU to clients established or situated in the Union on the basis of reverse solicitation of services in accordance with Article 21c

### 2.2.2. Proportionality and templates' addressees

14. The principle of proportionality is introduced through the classification of the TCBs into two distinct categories: Class 1 and Class 2. This classification ensures that regulatory requirements are tailored to the size, complexity, and risk profile of the TCBs, thereby promoting a balanced and risk-sensitive supervisory approach.
15. This draft ITS implement proportionality through a 'core plus supplement approach', requiring a core set of information from all TCBs, while mandating more detailed and comprehensive information from Class 1 TCBs.
16. For templates related to the HU in Annex II, proportionality has been applied at the frequency level. The datapoints are shared for both classes of TCBs as the entire set of information is considered relevant regardless of the TCB's classification.

### 2.2.3. Reporting frequencies

17. As mandated by Article 48k of CRD, paragraph 1 of Article 48l requires the EBA to specify reporting frequencies for the templates. However, paragraph 2 of Article 48l sets out minimum reporting frequencies: Class 1 TCBs shall report at least twice a year, while Class 2 TCBs shall report at least annually. In compliance with these two requirements, this ITS sets the following specific reporting frequencies for each template in Annex I:

*Table 3 - Frequency set out in Annex I to this ITS*

Template code	Reporting frequencies	Addressees	Name of the template /group of templates
<b>Financial information</b>			
E 01.01	Quarterly	Class 1 TCBs	Assets and liabilities booked and originated by the third country branch (Class 1)
E 01.02	Quarterly	Class 2 TCBs	Assets and liabilities booked and originated by the third country branch (Class 2)
E 02.00	Quarterly	Class 1 TCBs / Class 2 TCBs	Selected off-balance sheet items held and originated by the third country branch (Class 1 and Class 2)
E 03.01	Semi-annually	Class 1 TCBs	Largest assets and significant exposure concentrations (Class 1)
E 03.02	Annually	Class 2 TCBs	Largest assets and significant exposure concentrations (Class 2)
E 04.01	Semi-annually	Class 1 TCBs	Largest liabilities and significant funding sources concentrations (Class 1)
E 04.02	Annually	Class 2 TCBs	Largest liabilities and significant funding sources concentrations (Class 2)
E 05.01	Semi-annually	Class 1 TCBs	Significant internal transactions with the HU and with members of the HU's group - Amounts payable to and amounts receivable (Class 1)
E 05.02	Annually	Class 2 TCBs	Significant internal transactions with the HU and with members of the HU's group - Amounts payable to and amounts receivable (Class 2)
E 06.01	Semi-annually	Class 1 TCBs	Significant internal transactions with the HU and with members of the HU's group - Expenses and income generated by transactions (Class 1)
E 06.02	Annually	Class 2 TCBs	Significant internal transactions with the HU and with members of the HU's group - Expenses and income generated by transactions (Class 2)
<b>Regulatory information</b>			
E 07.01	Quarterly	Class 1 TCBs	Computation of the minimum capital endowment requirement (Class 1)
E 07.02	Quarterly	Class 2 TCBs	Computation of the minimum capital endowment requirement (Class 2)

E 08.01	Quarterly	Class 1 TCBs	Deposited assets covering for the MCER and monitoring of the evolution of the escrow account (Class 1)
E 08.02	Quarterly	Class 2 TCBs	Deposited assets covering for the MCER and monitoring of the evolution of the escrow account (Class 2)
E 09.01	Monthly	Class 1 TCBs	Liquidity coverage - calculations (Class 1)
E 09.02	Monthly	Class 2 TCBs	Liquidity coverage - calculations (Class 2)
E 10.00	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Deposit protection arrangements available to depositors in the third-country branches in accordance with Article 15(2) and (3) of DGSD (Class 1 and Class 2)

18. For the reporting of the information on the HU, the reporting frequencies set out by this ITS are the minimum frequencies outlined in Article 48l(2) of CRD, except for the templates H 01.00 and H 02.00, which address the reporting of information on the head undertaking's group of the reporting TCB.. For these templates, this ITS prescribes a higher reporting frequency.

*Table 4 - Frequency set out in Annex II to this ITS*

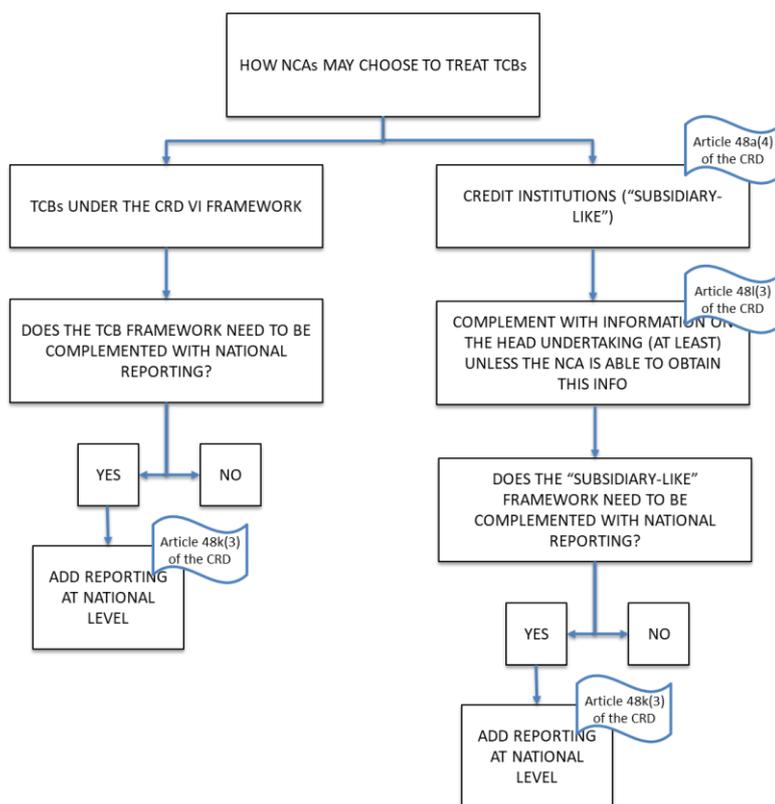
Template code	Reporting frequencies	Addressees	Name of the template /group of templates
<b>Quantitative information</b>			
H 01.00	Quarterly	Class 1 TCBs / Class 2 TCBs	Information on the head undertaking's group
H 02.00	Quarterly	Class 1 TCBs / Class 2 TCBs	Information on selected subsidiaries and on other third-country branches of the third-country group in the Union
H 03.01	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Head undertaking's compliance with the applicable prudential requirements in the third country (Basel III)
H 04.00	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Services provided by the head undertaking on the basis of reverse solicitation of services
<b>Qualitative information</b>			
H 03.02	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Head undertaking's compliance with the applicable prudential requirements in the third country (other than Basel III)
H 05.00	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Head undertaking's significant supervisory reviews and assessments
H 06.00	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Head undertaking's recovery plans and the specific measures that could be taken on the third-country branches in accordance with those plans
H 07.00	Semi-annually/ Annually	Class 1 TCBs / Class 2 TCBs	Head undertaking's business strategy in relation to the TCB

#### **2.2.4. National specificities for Member States choosing not to adopt and transpose the TCB minimum harmonisation regime in the CRD VI**

19. Article 48a(4) of the CRD clarifies that Member States may choose to apply to all or some of their TCBs the same requirements that are applicable to credit institutions authorised under the CRD. This includes the application of reporting requirements. In such cases, TCBs would adhere to the reporting requirements specified in the EBA reporting framework, rather than the TCB-specific reporting framework under this draft ITS. When implementing this approach, CAs must ensure that the reporting requirements effectively address the objectives and minimum standards established under the TCB regime of CRD VI. This alignment must be achieved not only in theory but also in practice.

20. Member States will still be required, in any case, to provide for and enforce those TCB-specific reporting obligations. This includes, but might not be limited to, the requirements regarding the financial and regulatory information on the head undertakings of the TCBs.

Figure 2 - National specificities for TCBs' treatment by NCAs



### 2.2.5. National specificities for Member States choosing to adopt and transpose the TCB minimum harmonisation regime in the CRD

21. The specifications outlined in this ITS establish the minimum reporting obligations based on the standardised templates developed by the EBA to address the reporting requirements specified in points (a) to (c) of Article 48k(1) and all points in Article 48k(2) of the CRD. CAs may impose additional reporting requirements for TCBs under national legislation. This could occur, as highlighted in paragraph 3 of Article 48k of the CRD, where a CA 'considers additional information necessary to gain a comprehensive understanding of the business, activities, or financial soundness of the third-country branches or their head undertaking, to verify their compliance with applicable laws, and to ensure the branches adhere to those laws'.

22. Article 48k(3) of the CRD allows for optionality and national discretion, while point (d) of Article 48k(1) of the CRD includes additional national requirements within the scope of regulatory and financial information TCBs must report to their CAs. This ITS does not propose any standardised templates for the requirements mentioned in point (d) of Article 48k(1) of the CRD.

## 2.3. Reporting details by topic

23. Information submitted under Annex I shall be requested based on the financial year end of the TCB.

24. The information requested in Annex II shall generally also be provided based on the financial year-end of the HU.

### 2.3.1. Financial information on third-country branches

25. To ensure harmonisation of definitions and integration of reporting, all information under Article 48k(1) of the CRD shall be reported using consistent definitions based on accounting concepts (carrying and nominal amounts).

26. Point (a) of Article 48k(1) of the CRD is addressed by templates E 01.01, E 01.02 and E 02.00. Assets, liabilities, and selected off-balance-sheet items are categorised by instrument type in the rows. For Class 2 TCBs, the breakdown in E 01.02 is limited to financial instruments. Furthermore, assets and liabilities are categorised by their booked and originated amounts in the columns.

27. Points (i) and (ii) of Article 48k(1)(a) of the CRD, covering breakdowns for largest recorded assets and liabilities by counterparty type and significant exposure and funding source concentrations, are addressed by templates E 03.01, E 03.02, E 04.01, and E 04.02.

28. Point (a)(iii) of Article 48k(1) of the CRD, addressing significant internal transactions with the head undertaking and with members of the head undertaking's group, is covered by templates E 05.01, E 05.02, E 06.01, and E 06.02.

### 2.3.2. Regulatory information on third-country branches

29. Point (b) of Article 48k(1) of the CRD indirectly references to two key requirements introduced by the CRD in its Title VI: Capital endowment requirements as outlined in Articles 48e and 48o of the CRD and liquidity requirements as specified in Article 48f of the CRD.

30. Templates E 07.01 and E 07.02 facilitate the computation of the capital endowment requirement (CER), whereas templates E 08.01 and E 08.02 are designed to support the monitoring of the as-sets to be deposited by the TCB in escrow, in fulfilment of their CER. Class 1 templates shall be reported for significant currencies to ensure that this ITS aligns with several aspects of the Draft Guidelines on instruments available for TCBs for unrestricted and immediate use to cover risks or losses as outlined under Article 48e(2)(c) of the CRD.

31. The provisions of Article 48f of the CRD pertain to the fulfilment of the prudential liquidity requirement, rather than the reporting liquidity requirement. Paragraph 2 of Article 48f of the CRD mandates that MS require Class 1 TCBs to comply with the liquidity coverage requirement

laid down in Part Six, Title I, of Regulation (EU) No 575/2013 (CRR) and in Commission Delegated Regulation (EU) 2015/61 (LCR Delegated Regulation). Template E 09.01 aligns with both requirements. For the sake of comparability, template E 09.02 also aligns with both regulations, though requiring a more proportionate reporting for Class 2 TCBs – of their sufficient unencumbered liquid assets covering liquidity outflows over a minimum 30-day period. Hence, providing a more lenient calculation – due to the elimination of inflow caps that are applied in the standard LCR for Class 1 TCBs.

32. Point (c) of Article 48k(1) of the CRD is addressed through template E 10.00, though not all TCBs in the EU are subject to this template. Article 48k(1)(c) of the CRD refers to cases under Directive 2014/49/EU (DGSD) where a TCB may operate in a Member State without joining the host MS's DGS. However, under the ongoing Reform of bank crisis management and deposit insurance framework, the forthcoming DGSD3 is expected to prohibit this scenario requiring all TCBs to join the host Member State's DGS as a condition for authorisation. As such, template E 10.00 may become obsolete. Nevertheless, due to uncertainty regarding the timing and application of DGSD3, a provisional version of the template is included.

### **2.3.3. Quantitative information on the head undertaking**

33. Point (a) of Article 48k(2) of the CRD is addressed through templates H 01.00 and H 02.00 as follows: In template H 02.00, TCBs shall report on an entity-by-entity basis information on selected subsidiaries and on other TCBs that are part of the same third-country group in the Union, as determined at the level of the ultimate HU of that group.

34. Template H 01.00 provides information on the aggregated assets and liabilities within the Union of the TCG at the level of the ultimate HU, as well as identifications of Direct head undertaking and Other applicable head undertaking of the reporting TCB.

35. Point (b) of Article 48k(2) of the CRD is addressed through templates H 03.01 and H 03.02. Template H 03.01 provides supervisors with a summary of key Basel III metrics including the own funds, the risk-weighted assets, the liquidity coverage ratio, the net stable funding ratio and the leverage ratio. This applies where the HU of the reporting TCB operates under prudential legislation in its third country that aligns with Basel III standards. Template H 03.02 requires TCBs to provide detailed information on key metrics in cases where the jurisdiction of the HU does not apply Basel III definitions.

36. Point (f) of Article 48k(2) of the CRD is addressed through template H 04.00. Article 21c of the CRD prohibits the direct provision of core banking services from third countries, requiring the establishment of a TCB in the MS where such core banking services are intended to be provided, while permitting the provision of services via reverse solicitation. Template H 04.00 facilitates the collection of key quantitative data related to the provision of core banking services under this modality.

### 2.3.4. Qualitative information on the head undertaking

37.Regarding the information to be reported on the head undertaking under Article 48k(2) of the CRD, points (c) to (e) refer to information that it is primarily qualitative in nature. This applies for templates H 05.00 which covers significant supervisory reviews and assessments of the HU, H 06.00 which is related to the recovery plans of the HU, and H 07.00 which addresses the business strategy of the HU in relation to the reporting TCB.

## 2.4. Simplification

38.Following the public consultation and in line with the EBA's broader simplification agenda, a series of targeted adjustments were introduced to the draft ITS on TCB reporting. These changes respond to two parallel drivers: (i) the feedback received from stakeholders during the consultation process, and (ii) the strategic direction set by the EBA's governing bodies as part of the wider BoS-endorsed programme to streamline supervisory reporting and reduce costs.

39.**Alignment with the EBA-wide simplification program:** In Q4 2025, the EBA published a report on the efficiency of the regulatory and supervisory framework<sup>2</sup>, making simplification of supervisory reporting a strategic priority, with the objective of reducing reporting costs by up to 25%. This includes reducing unnecessary granularity, improving proportionality, and avoiding duplication in both EBA and national data collections. As a new reporting framework under CRD VI, the TCB ITS was explicitly considered in this optimisation effort, prompting several top-down simplifications.

40.**Simplifications resulting from public consultation feedback:** Respondents identified feasibility concerns, challenges in obtaining head-undertaking (HU) data, and disproportionate operational burdens—particularly for Class 2 branches. In response, the final ITS:

- **Postpones the first reporting reference date to 31 March 2027**, allowing a full implementation year and avoiding 2026 data collection;
- **Extends remittance deadlines** for Annex II templates by one month to reflect differences in third-country accounting calendars;
- **Streamlines templates** by removing low-value or overly burdensome fields, e.g. granular country breakdowns and revenue columns in H 04.00; deletion of columns 0050/0060 in E 01.01;
- **Clarifies instructions**, e.g. confirming that HU reporting requires aggregation rather than consolidation;

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<sup>2</sup> <https://www.eba.europa.eu/sites/default/files/2025-10/b8e0ef8e-2d49-43fc-b917-dbca3423588c/Report%20on%20the%20efficiency%20of%20the%20regulatory%20and%20supervisory%20framework.pdf>

- **Enhances proportionality**, including less frequent reporting for Class 2 TCBs and simplification of several data collections.

41. **Simplifications arising from EBA:** Beyond the consultation feedback, additional adjustments reflect the EBA's recommendation to embedding simplification principles across new reporting frameworks. These include:

- **Reducing duplication and technical burden** through structural improvements such as a z-axis in Annex II, enabling multiple HUs to be reported within a single file;
- **Adjusting scope where needed**, including removing certain entity-level data fields in H 02.00 and expanding identifiers in H 01.00 to avoid parallel data requests.

42. Taken together, these simplifications substantially improve the operational feasibility of the TCB reporting framework, reduce unnecessary complexity, and align the ITS with the EBA's wider objective of a more coherent and proportionate EU reporting landscape. They also provide greater clarity for industry while preserving supervisory effectiveness under CRD VI.

## 3. Draft Implementing Technical Standards

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**COMMISSION IMPLEMENTING REGULATION (EU) .../...****of XXX**

laying down implementing technical standards for the application of Directive 2013/36/EU of the European Parliament and of the Council with regard to third country branches reporting  
(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,  
Having regard to Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC<sup>3</sup>, and in particular Article 48l(1), the fourth subparagraph thereof,  
Whereas:

- (1) Directive 2024/1619 of the European Parliament and of the Council<sup>4</sup> amending Directive 2013/36/EU introduced a new regime, in Title VI, for the establishment, regulation and supervision of third country branches in the Union which sets out additional supervisory powers for competent authorities with regard to third-country branches. As part of this regime, and for the purpose of framing the use of the additional supervisory powers for third-country branches, specification of the information to be received by the competent authorities should include all information that is necessary for facilitating the effective supervision of compliance by third-country branches with applicable prudential and supervisory requirements.
- (2) According to Article 48l(1), second sub-paragraph of Directive 2013/36/EU, these reporting requirements are to be proportionate to the classification of third-country branches as either Class 1 or Class 2. Therefore, two sets of templates should be developed, one for each class, in accordance with an approach whereby Class 1 third-country branches are expected to report more detailed information than Class 2.
- (3) In order to harmonise the supervisory practices regarding third-country branches at the Union level and to allow for a comprehensive view of the core banking services provided

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<sup>3</sup> Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC (OJ L 176, 27.6.2013, p. 338, ELI: <http://data.europa.eu/eli/dir/2013/36/oj>).

<sup>4</sup> Directive (EU) 2024/1619 of the European Parliament and of the Council of 31 May 2024 amending Directive 2013/36/EU as regards supervisory powers, sanctions, third-country branches, and environmental, social and governance risks (OJ L, 2024/1619, 19.6.2024, p. ELI: <http://data.europa.eu/eli/dir/2024/1619/oj>).

by head undertakings into the Union upon reverse solicitation, it is necessary for this Regulation to also specify reporting remittance dates.

- (4) This Regulation is based on the draft implementing technical standards submitted to the Commission by the EBA.
- (5) The EBA has conducted open public consultations on the draft implementing technical standards on which this Regulation is based, analysed the potential related costs and benefits, and requested the advice of the Banking Stakeholder Group established in accordance with Article 37 of Regulation (EU) No 1093/2010 of the European Parliament and of the Council<sup>5</sup>.
- (6) This Regulation should enter into force on the day following the date of its publication in the Official Journal of the European Union. Nevertheless, templates catering for the reporting requirements under Article 48k(1) that are dependent on underlying provisions in Articles 48h, 48e and 48f of Directive 2013/36/EU, will only become applicable on 11 January 2027. Moreover, this Regulation should provide third-country branches with sufficient time to prepare for reporting. Therefore, third-country branches should be required to comply with their reporting obligations from 31 March 2027.

HAS ADOPTED THIS REGULATION:

#### *Article 1*

#### **Reporting reference dates**

1. Third-country branches shall submit the information referred to in this Regulation to competent authorities as this information stands on the following reporting reference dates:
  - (a) monthly reporting: on the last day of each month;
  - (b) quarterly reporting: 31 March, 30 June, 30 September and 31 December;
  - (c) semi-annual reporting: 30 June and 31 December;
  - (d) annual reporting: 31 December.
2. Third-country branches shall report the financial information on the third-country branch itself referred to in Annex I in accordance with the Regulation (EC) No 1606/2002 of the European Parliament and of the Council or the applicable generally accepted accounting principles of the Member State and referring to a certain period cumulatively from the first day of the accounting year to the reference date.
3. Where third-country branches are permitted by national laws to report their financial and regulatory information based on their accounting year-end, which deviates from the calendar year-end, reporting reference dates may be adjusted

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<sup>5</sup> Regulation (EU) No 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/78/EC (OJ L 331, 15.12.2010, p. 12, ELI: <http://data.europa.eu/eli/reg/2010/1093/oj>).

accordingly so that the reporting is also done every one, three, six or twelve months from their accounting year-end. The same applies for information on the head undertaking, provided that the relevant third-country jurisdiction permits the reporting of regulatory information using the fiscal year end as the reference date.

### *Article 2*

#### **Reporting remittance dates**

1. Third-country branches shall submit information referred to in Annex I to competent authorities by close of business on the following remittance dates:
  - (a) monthly reporting: 15th calendar day after the reporting reference date;
  - (b) quarterly reporting: 12 May, 11 August, 11 November and 11 February;
  - (c) semi-annual reporting: 11 August and 11 February;
  - (d) annual reporting: 11 February.
2. Third-country branches shall submit information referred to in Annex II to competent authorities by close of business on the following remittance dates:
  - (a) quarterly reporting: 11 June, 11 September, 11 December and 11 March;
  - (b) semi-annual reporting: 11 September and 11 March;
  - (c) annual reporting: 11 March.
3. If the remittance day is a public holiday in the Member State of the competent authority to which the report is to be provided, or a Saturday or a Sunday, data shall be submitted on the following working day.
4. Where third-country branches report their financial information or information on the head undertaking using adjusted reporting reference dates based on their accounting year-end as set out in Article 1(3), the remittance dates may also be adjusted accordingly so that the same remittance period from the adjusted reporting reference date is maintained.
5. Third-country branches may submit unaudited figures. Where audited figures deviate from submitted unaudited figures, the revised, audited figures shall be submitted without undue delay. Unaudited figures are figures that have not received an external auditor's opinion whereas audited figures are figures audited by an external auditor expressing an audit opinion.
6. Other corrections to the submitted reports shall also be submitted to the competent authorities without undue delay.

### *Article 3*

#### **Reporting on regulatory and financial information on third-country branches**

1. Third-country branches that meet the criteria set out in Article 48a(1) of Directive 2013/36/EU (Class 1) shall submit the templates with information on their own regulatory and financial information as specified in Annex I as follows:
  - (a) template 9.1 with a monthly frequency;
  - (b) templates 1.1, 2, 7.1 and 8.1 with a quarterly frequency;
  - (c) templates 3.1, 4.1, 5.1, 6.1 and 10 with a semi-annual frequency.
2. Third-country branches that do not meet the criteria set out in Article 48a(1) of Directive 2013/36/EU (Class 2) shall submit the templates with information on their own regulatory and financial information as set out in Annex I, as follows:
  - (a) template 9.2 with a monthly frequency;
  - (b) templates 1.2, 2, 7.2 and 8.2 with a quarterly frequency;
  - (c) templates 3.2, 4.2, 5.2, 6.2 and 10 with an annual frequency.
3. By way of derogation, template 10 shall be reported if required from the respective National Competent Authority.

### *Article 4*

#### **Regulatory and financial information on the head undertaking**

1. Third-country branches that meet the criteria set out in Article 48a(1) of Directive 2013/36/EU (Class 1) shall submit the templates with information on the regulatory and financial information of their head undertaking as set out in Annex II, as follows:
  - (a) templates 1 and 2 with a quarterly frequency;
  - (b) templates 3, 4, 5, 6 and 7 with a semi-annual frequency.
2. Third-country branches that do not meet the criteria set out in Article 48a(1) of Directive 2013/36/EU (Class 2) shall submit the templates with information on the regulatory and financial information of their head undertaking as set out in Annex II, as follows:
  - (a) templates 1 and 2 with a quarterly frequency;
  - (b) 3, 4, 5, 6 and 7 with an annual frequency.

*Article 5***IT solutions, reporting templates and instructions**

1. The EBA shall ensure that the IT solutions, including instructions, developed pursuant to Article 481(1) of Directive 2013/36/EU comply with the uniform reporting formats laid down in this Regulation at all times and include all the data points and information listed in Annexes I and II to this Regulation
2. The EBA shall make available on its website the IT solutions, including instructions referred to in paragraph 1. The EBA shall keep those IT solutions up-to-date and available in all official languages.

*Article 6***Data exchange formats and information accompanying submissions**

1. Third-country branches shall submit the information referred to in this Regulation in the data exchange formats and representations specified by the competent authorities, respect the data point definition of the data point model and the validation formulae referred to in the IT solutions made available on the EBA website, and comply with the following specifications:
  - (a) they shall not include information in the data submission that is not required or not applicable;
  - (b) they shall submit numerical values as follows:
    - (i) they shall report data points with the data type ‘Monetary’ using a minimum precision equivalent to ten thousands of units;
    - (ii) they shall express data points with the data type ‘Percentage’ as per unit with a minimum precision equivalent to four decimals;
    - (iii) they shall not use decimals when reporting data points with the data type ‘Integer’ and shall use a precision equivalent to units;
  - (c) they shall identify institutions and insurance undertakings solely by their Legal Entity Identifier (LEI);
  - (d) they shall identify entities and counterparties other than institutions and insurance undertakings by their LEI, where available. When not available, they shall be identified by their National Code.
2. Third-country branches shall, together with the submitted information, submit the following information:
  - (a) reporting reference date and reference period;
  - (b) reporting currency;
  - (c) accounting standard;
  - (d) Legal Entity Identifier (LEI) of the reporting TCB, where available. When not available, their National Code.

*Article 7*

**Entry into force and application**

This Regulation shall enter into force on the day following that of its publication in the *Official Journal of the European Union*.

It shall apply from 28 March 2027.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

*For the Commission*  
*The President*  
*Ursula von der Leyen*

## 4. Accompanying documents

### 4.1. Additional clarifying examples

#### 4.1.1. Reporting periods for Capital Endowment Calculation

The following example illustrates how the three buckets (T-1, T-2, T-3) are applied for the computation of the Minimum Capital Endowment. This approach ensures consistency across Class 1 and Class 2 branches and aligns with the principle that the annual reporting period (December) serves as the reference point.

Under this method, the template includes three columns corresponding to the immediately preceding annual reporting periods, regardless of the branch's reporting frequency. Please see the table showing an illustrative example:

Reporting period	T-1	T-2	T-3
June 2030	Dec 2029	Dec 2028	Dec 2027
December 2030	Dec 2030	Dec 2029	Dec 2028
June 2031	Dec 2030	Dec 2029	Dec 2028

When reporting in June 2030, the calculation uses liabilities as of December 2029 (T-1), December 2028 (T-2), and December 2027 (T-3). When reporting in December 2030, the December liabilities for the same year are already available for the reported reference periods, and are therefore used as T-1, with the two preceding December figures used as T-2 and T-3. This ensures alignment with the annual reference principle and simplifies the template structure.

### 4.2. Draft cost-benefit analysis / impact assessment

As per Article 15 of Regulation (EU) No 1093/2010 (EBA Regulation), any draft implementing technical standards (ITS) developed by the EBA shall be accompanied by an Impact Assessment (IA), which analyses 'the potential related costs and benefits'.

This analysis presents the IA of the main policy options included in this Final Report on the Draft ITS on the supervisory reporting of Third Country Branches under the minimum harmonisation regime of Directive 2013/36/EU ('the Draft ITS'). The analysis provides an overview of the identified problem, the proposed options to address this problem as well as the potential impact of these options. The IA is high level and qualitative in nature.

#### 4.2.1. Problem identification

In June 2021, the European Banking Authority (EBA) published the Report on the treatment of incoming third country branches (TCBs) under national law of Member States (EBA/REP/2021/20 or

EBA 2021 Report) and recommended a more harmonised approach, underpinned on a centralised equivalence assessment, effective supervisory cooperation with home state regulators and, most importantly, uniform supervisory requirements.

The last amendment of the CRD (Directive (EU) 2024/1619 or CRD VI) comes to materialise those recommendations. Title VI has been extensively developed in scope to focus both on the relations with third countries and, even more primarily, on establishing a prudential supervisory regime specific for TCBs. As a distinctive trait, the regime applies minimum harmonisation only, as conditioned by the fact that the supervision of TCBs shall remain a national task in nature.

As part of the TCB regime, Article 48k of CRD specifies the information that TCBs have to report to their competent authorities (CAs). Even though that information is quite similar in content to the information already requested in the former Article 47(1a) of CRD V, this information is more elaborated, and some new requirements have been added by the CRD VI. Therefore, the related existing reporting has to be adapted.

To address this, the EBA has been mandated in the Article 48l(1) of the CRD to develop implementing technical standards (ITS) specifying uniform formats and definitions for, and the frequency of, re-reporting, and to develop the IT solutions to be applied for the purposes of Article 48k.

#### **4.2.2. Policy objectives**

The draft ITS on the supervisory reporting of Third Country Branches under the minimum harmonisation regime of Directive 2013/36/EU aims at specifying uniform formats and definitions for, and the frequency of, reporting for the purposes of Article 48k of the CRD.

#### **4.2.3. Options considered, assessment of the options and preferred options**

Section 4.2.3. presents the main policy options discussed and the decisions made by the EBA during the development of the Draft ITS. Advantages and disadvantages, as well as potential costs and benefits from the qualitative perspective of the policy options and the preferred options resulting from this analysis, are provided.

##### Templates regarding the head undertaking

As mentioned above, Article 48l(1) of the CRD mandates the EBA to develop implementing technical standards for the provision of information related to TCBs as detailed in Article 48k of the CRD. Article 48k of the CRD mentions that the reporting of TCBs should include information on 'significant internal transactions with the head undertaking and with members of the head undertaking's group' and Article 48l(1) that 'The reporting requirements referred to in Article 48k shall be proportionate to the classification of third-country branches as either Class 1 or Class 2.' In this context, the EBA considered two options:

##### **Option 1a: Including proportionality in the templates regarding the TCBs' head undertaking;**

**Option 1b: Not including proportionality in the templates regarding the TCBs' head undertaking.**

Including proportionality in the templates regarding the TCBs' head undertaking could reduce the reporting burden for Class 2 TCBs and align with the general principle of proportionality under the CRD VI. It might also allow for a more tailored approach to data collection, reflecting the lower risk profile of these TCBs. However, this would require the development and maintenance of two separate sets of templates.

On the other hand, not including proportionality in the templates regarding the TCBs' head undertaking would ensure that all relevant information under Article 48k(2) of the CRD is collected uniformly, regardless of the TCBs' classification. This approach would support consistency, comparability, and completeness of TCBs' head undertakings data. Above all, the EBA considered that all data points requested for Class 1 TCBs are necessary, and this justifies the use of a similar template for Class 2 TCBs.

Based on the above, **Option 1b has been chosen as the preferred option** and the draft ITS will not include proportionality in the templates regarding the TCBs' head undertaking.

Liquidity Coverage Ratio (LCR) information

According to Article 48f(2) of the CRD, Class 1 TCBs are required to comply with the LCR requirements laid down in Part Six, Title I, of Regulation (EU) No 575/2013 and in Commission Delegated Regulation (EU) 2015/61, but the CRD VI does not give specific guidance when it comes to the Class 1 TCBs' LCR reporting. In this regard, the EBA considered two options.

**Option 2a: Requesting the Class 1 TCBs to report the whole LCR framework (like for Credit Institutions)****Option 2b: Requesting the Class 1 TCBs to report only one LCR template (i.e. C76.00)**

Requesting Class 1 TCBs to report the entire LCR framework, like for Credit Institutions, could ensure highest alignment with the liquidity requirements laid down in Part Six, Title I, of Regulation (EU) No 575/2013 (and in Commission Delegated Regulation (EU) 2015/61) and provide supervisors with granular data. It would also mirror the reporting obligations of credit institutions, supporting consistency across entities. However, this would imply submitting five to six extensive templates, which would be highly disproportionate compared to the rest of the TCB reporting framework. It would also significantly increase the reporting burden and implementation costs for both Class 1 TCBs and competent authorities.

On the other hand, requesting only one template (i.e. C76.00) allows for a more proportionate approach while still capturing the key components of the LCR. This summary template provides sufficient insight into LCRs' data and computation without overwhelming reporting entities.

Based on the above, **Option 2b has been chosen as the preferred option**. The draft ITS will therefore require Class 1 TCBs to report only one LCR template (i.e. C76.00 – which is referenced as E09.01 in the TCB reporting framework).

#### TCB reporting vs. Credit Institutions reporting

The EBA considered two options regarding the alignment of the TCB reporting with the Credit Institutions' reporting:

#### **Option 3a: Tailoring the TCB reporting templates with regard to the TCBs specificities**

#### **Option 3b: Aligning some of the TCBs reporting templates to the Credit Institutions templates**

Tailoring the TCB reporting templates towards TCBs' specificities could allow for more focused reporting inflation, reflecting the unique structure and operations of TCBs. However, this approach would require the development of entirely new templates, increasing design and implementation complexity. It could also hinder comparability with Credit Institutions and reduce the efficiency of supervisory analysis across different types of entities.

On the other hand, aligning at least part of the TCBs' reporting templates to the Credit Institutions' templates supports consistency and comparability of data across the EU banking sector. Templates based on – even though less detailed than – those used for large exposures, LCR and ALMM were included to facilitate supervisory review and reduce implementation costs for TCBs that are part of groups already using these templates. This approach also benefits competent authorities by enabling more streamlined data integration and analysis.

Based on the above, **Option 3b has been chosen as the preferred option**. The draft ITS will therefore try to align, especially for these three specific topics, the TCBs reporting templates to the Credit Institutions templates. Nevertheless, for the remaining topics, the templates are proposed to be TCB-specific.

#### **4.2.4. Conclusion**

The development of the draft Implementing Technical Standards (ITS) on the supervisory reporting of Third Country Branches under the minimum harmonisation regime of Directive 2013/36/EU is intended to specify uniform formats and definitions for, and the frequency of, reporting for the purposes of Article 48k of the CRD. The costs associated with the implementation of these ITS are not deemed to be material and are largely absorbed by the existing compliance requirements under Article 48 of the CRD. Furthermore, following the consultation process, the EBA introduced targeted simplifications and clarifications to ensure proportionality and reduce unnecessary complexity. The expected benefits – namely, improved enhanced supervisory convergence and greater transparency – are expected to outweigh the limited costs. Overall, the impact assessment on the draft ITS suggests that the expected benefits are higher than the incurred expected costs.

### 4.3. Feedback on public consultation

The EBA publicly consulted on this Draft ITS. The consultation period lasted for three months and ended on 31 October 2025. Three responses were received, of which two were made available on the EBA website.

This section summarises the feedback provided during the consultation, the analysis carried out by the EBA, and the actions taken where appropriate. Key adjustments include extended implementation timelines, streamlined templates, enhanced proportionality for smaller branches, and clarifications on accounting standards and reporting instructions.

Changes to the final draft ITS have been incorporated as a result of the responses received during the public consultation.

**Summary of key changes based on the Feedback from public consultation** Following the consultation feedback, several targeted amendments were introduced to improve clarity, proportionality, and operational feasibility, while streamlining the framework. The first major adjustment concerned timelines: the initial reporting reference date was postponed to 31 March 2027 for all requirements. Remittance deadlines for Annex II templates were extended by one month, and Articles 1(3) and 2(3) were revised to allow non-calendar financial year ends for head undertakings – changes designed to ease implementation without compromising supervisory objectives.

The reverse-solicitation template was significantly streamlined: references to the ultimate head undertaking were removed, granular country breakdowns and revenue columns were deleted, and instructions clarified that figures should be aggregated rather than consolidated.

Further refinements focused on simplifying instructions and aligning standards. Article 1(2) was adjusted to match CRD VI wording, and H 02.00 now specifies that entities should use the same accounting standard applied for supervisory reporting in their jurisdiction, avoiding additional conversion work. Liquidity coverage reporting was kept proportionate by requiring only a summary LCR template for Class 1 branches, with instructions enhanced to ensure consistency with the CRR definitions. At branch level, template E 01.01 was simplified by removing columns 0050 and 0060, eliminating a split that exceeded Level 1 text and added complexity.

Additional practical guidance was introduced through an annex of examples for mixed periodicity in templates E 07.01 and E 07.02, supporting clearer implementation. Finally, templates H 01.00 and H 02.00 were amended to clarify instructions, reducing the burden of non-financial entity-by-entity reporting across the Union. Collectively, these adjustments reflect a deliberate effort to simplify the framework – removing details with a limited regulatory significance, reducing duplication, and extending timelines – while preserving the integrity and comparability of supervisory data.

## **Summary of other changes beyond the feedback from public consultation**

To ensure the reporting framework fully meets the objectives of Articles 48k and 48l of the CRD, several technical and structural improvements were introduced beyond the scope of consultation feedback. These changes are designed to enhance consistency with the Level 1 text, improve operational feasibility for competent authorities and reporting entities, and avoid parallel or duplicative data collections. Collectively, they strengthen the framework's ability to deliver complete, reliable supervisory data while reducing unnecessary complexity for all stakeholders.

### Amendment to Template E 09.02

Template E 09.02, which addresses liquidity coverage calculations for Class 2 TCBs, was revised in order to ensure consistency and proportionality and now focuses on net liquidity outflows, aligning the reporting obligation with the Level 1 text and avoiding unintended supervisory asymmetries.

### Introduction of a Z-Axis in Annex II Templates

A structural change was introduced across most of the templates in Annex II by adding a z-axis dimension. This adjustment addresses potential technical constraints NCAs could encounter in collecting the same file multiple times for different HUs. Under the revised approach, each HU will be reported at the sheet level, ensuring that all relevant data can be captured within a single submission without requiring multiple iterations of the same file. This change enhances operational feasibility and reduces the risk of data fragmentation.

### Additional Information in Template H 01.00

Template H 01.00 was expanded to include details on the direct head undertaking and other applicable head undertakings of the reporting TCB. This enhancement addresses a critical data gap: since reporting TCBs are not in the scope of template H 02.00, the absence of this information would otherwise necessitate ad hoc data requests by supervisors. By embedding these identifiers within H 01.00, the ITS ensures that competent authorities have a complete view of the group structure without imposing additional reporting burdens or creating inefficiencies.

### Deletion of columns 0010-0040 in Template H 02.00

Template H 02.00 as consulted contained the first four columns which identified the direct head undertaking of selected subsidiaries and other TCBs of the group. In the context of the simplification efforts and also taking into account the mandate for this reporting, these columns were removed.

In summary, these changes ensure better alignment with the CRD mandate, streamline the reporting process, and create a future-proof framework that benefits both supervisors and institutions by reducing complexity and avoiding redundant data collections.

## Summary of responses to the consultation paper EBA/CP/2025/28 and the EBA's analysis

Comments	Summary of responses received	EBA analysis	Amendments to the proposals
<b>General comments</b>			
Feasibility and proportionality of reporting requirements for Third-Country Branches	One respondent expressed support for the EBA's objective of achieving consistent and comparable supervisory data but emphasised that the feasibility and proportionality of the reporting requirements – particularly those linked to the HU and the wider third-country group – are essential to ensure effectiveness without creating operational burdens disproportionate to supervisory value. They stressed that obtaining timely, granular, and verifiable information from the HU or from other EU and non-EU group entities remains one of the most significant practical challenges for TCBs, especially for smaller branches with limited local infrastructure.	N/A	No amendments.
<b>Question 1: Are the scope and level of application of the reporting requirements and the content of all the templates, and the instructions clear and appropriate?</b>			
Duplication in head undertaking reports	One respondent explained that firms need to clearly understand how to collect and consolidate the relevant information and referenced the paragraph 1.3 considering relevant head undertaking. For templates where no specific head undertaking is indicated, one respondent questioned the added value of submitting multiple reports, noting that this would not enhance clarity or provide additional supervisory insight. It was highlighted in certain templates, such as H 02.00, or H 06.00.	Question goes beyond the scope of this ITS. Please refer to the relevant NCA to understand which level of HU is relevant for the purposes of Article 47(3)(2) of the CRD.  The reporting requirements are designed to ensure clarity and consistency across different levels of head undertakings. Where more than one level is relevant, the number of data points remains the same regardless of whether reports are submitted separately or combined.	No amendments.

	<p>One respondent suggested that, where a third-country banking group operates multiple branches in the Union, the reporting framework should be designed to avoid duplication and facilitate effective information sharing among competent authorities. They proposed designating a single branch as the reporting entity for the group to reduce burden and promote supervisory cooperation. It was also noted that integrated reporting systems accessible to relevant authorities would help minimise overlaps and align with the ‘report once’ principle set out in EU data-sharing initiatives.</p>	<p>Question goes beyond the scope of this ITS.</p>	<p>No amendments.</p>
<p>Interaction between proposed ITS and other ongoing reporting obligations for intermediate parent undertaking supervision</p>	<p>One respondent requested clarification on whether the new reporting requirements for third-country branches will replace existing obligations related to intermediate parent undertaking supervision and seek confirmation that the ITS does not introduce overlapping frameworks and whether current IPU reporting will continue alongside the new regime.</p>	<p>The EBA has assessed the possibility to align this reporting with the IPU reporting under Article 21b(6) of the CRD. However, there are notable differences between these requirements: among other differences, the addressees of both reporting requirements differ, and the calculation of assets varies. Additionally, in the TCB reporting, the scope of the subsidiaries is broader, and the scope of the TCBs is smaller than those in the IPU threshold monitoring reporting. Therefore, two sets of templates are necessary for TCB reporting and IPU threshold monitoring reporting, even though they contain a set of common data points. Moreover, the IPU reporting is an obligation from the NCAs to the EBA.</p>	<p>No amendments.</p>

Assessment of proportionality in reporting requirements for TCBs under CRD VI	One respondent agreed with the scope and level of application; however they pointed that while the ITS apply this principle to Annex I, it is not extended to Annex II, hence suggested discrepancy with the systematic application of the principle of proportionality, resolving in unnecessary administrative burden, challenges in data availability (particularly for Class 2 TCBs), and potential inconsistencies in data aggregation.	The principle of proportionality has been applied to the reporting framework. Class 2 branches are subject to a lower reporting frequency compared to Class 1 branches, and the head undertaking templates are limited in scope and data points.	No amendments.
<b>Question 2: Do the respondents identify any discrepancies between these templates and instructions and the calculation of the requirements set out in the underlying regulation?</b>			
Duplication in head undertaking reports	One respondent proposed that Article 48(k)(2)(b)–(f) pertains to obligations applicable to the direct head undertaking and, therefore, reporting should be related to the direct head undertaking.	EBA’s view differs, as the CRD provisions in Article 48(k)(2)(b)–(f) refer to the head undertaking and not to the direct head undertaking. The definition of the head undertaking is governed by the provisions in Article 47(3)(2) of the CRD.	No amendments.
Disproportionate requirements	One respondent expressed concern that the overall scope of the reporting requirements is disproportionate to the objectives of the underlying regulation. They argued that the volume and detail of information requested exceed what is necessary for effective prudential supervision of third-country branches.	The package has been carefully revised and significantly reduced in light of the comments received and the simplification efforts.	The package revision included, among other changes, reinforcement of proportionality, postponement of the initial reporting reference date to 31 March 2027, and removal of granular country breakdowns and revenue columns.
<b>Question 3: Do the respondents agree that the ITS fits the purpose of the underlying regulation?</b>			
N/A			
<b>Question 4: Do the respondents consider the transition period and frequency of the first year reporting clear and feasible?</b>			

<p>Application date</p>	<p>One respondent requested clarification on the first remittance date and initial reporting periods. They noted uncertainty regarding which templates apply for the first annual reference period, which reports are subject to later implementation, and what the relevant reference periods should be. Concerns were raised about whether the one year one-year implementation period refers to the calendar year 2026 or runs from the ITS application date to December 2027. One respondent mainly pointed out the potential uncertainty around the remittance date for the H 04.00 on reverse solicitation.</p> <p>One respondent moreover proposed to launch the full set of requirements in 7, using 2026 as a pilot year voluntary submission.</p> <p>Furthermore, two respondents raise concerns about the feasibility of the proposed timeline potentially leading to manual, tactical solutions, increasing operational risk and eventually unreliable data due to time and budgetary constraints.</p> <p>One respondent raised concern on feasibility of the reporting with the reference date of December 2026 and proposed the ITS to be set to March 7. Additionally, one respondent sought clarity on whether template H04.00 requires reporting of the outstanding stock of balance sheet items originated on the basis of reverse solicitation or a cumulative aggregate of new items during the reporting period. They noted that identifying assets, liabilities, or off-balance sheet items derived from reverse solicitation before Article 21c is implemented by Member States (scheduled for 11 January 2027) may be difficult,</p>	<p>EBA acknowledges the uncertainty and the cost of implementation of this report. In the context of the simplification efforts, the first reference date for all the requirements under this ITS are set to 31 March 2027.</p>	<p>Amended the first reference date for 31 March 2027.</p>
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	<p>creating uncertainty about the scope of historical data required.</p>		
	<p>One respondent noted that by the time the final report is published, 2026 technology budgets will have closed, making it unlikely that IT solutions will be operational to collate 2026 data. This would necessitate manual solutions, increasing operational risk and compliance costs.</p>		
	<p>One respondent stated that expecting firms to collect and report HU data by Q4 2026 is unrealistic. The required data is not currently available in the necessary format, and the proposed timelines do not allow sufficient time to develop, test, and deploy the required IT solutions.</p>		
	<p>One respondent indicated uncertainty about how the implementation period affects remittance dates for monthly, quarterly, and semi-annual reports due for the 31 December 2026 reference date.</p>	<p>EBA acknowledges that Article 7 of this ITS may bring unclarity for some cases.</p>	<p>The Article has been redrafted.</p>

**Question 5: Cost of compliance with the reporting requirements: Is or are there any element(s) of this proposal for new and amended reporting requirements that you expect to trigger a particularly high, or in your view disproportionate, effort or cost of compliance? If yes, please:**

- specify which element(s) of the proposal trigger(s) that particularly high cost of compliance;
- explain the nature/source of the cost (i.e. explain what makes it costly to comply with this particular element of the proposal) and specify whether the cost arises as part of the implementation, or as part of the on-going compliance with the reporting requirements;
- offer suggestions on alternative ways to achieve the same/a similar result with lower cost of compliance for you.

Annex II head undertaking reporting	One respondent indicated that several elements of the proposal are expected to generate high and disproportionate compliance costs. In particular, implementing the Annex II head undertaking reporting framework will require significant operational investment, as firms must build new systems and processes to collect, consolidate, and report data that is not currently available or tracked in the required format.	The CRD VI introduces a new regime for third-country branches (TCBs), requiring them to report specific information on their Head Undertaking (HU) in accordance with Article 48k(2).	No amendments.
Class 2 eligibility requirements and timing	<p>One respondent noted that Article 48a sets the criteria for classifying TCBs, with Class 2 firms benefiting from proportionality. Class 2 status depends on meeting quantitative asset and activity thresholds, the host state not appearing on the EU's high-risk AML list under Directive 2015/849, and the existence of a Commission equivalence decision on the TCB's home state.</p> <p>They highlighted that Article 48(b)(5) requires national authorities to classify a TCB as Class 1 until such an equivalence decision is adopted. The One respondent argued that this creates uncertainty and disproportionate compliance and implementation costs. They therefore requested that TCBs meeting all other Class 2 criteria should be classified as Class 2 while awaiting the Commission decision and only reclassified as Class 1 four months after a negative decision, as allowed by Article 48(a)(3).</p>	Question goes beyond the scope of this ITS. Subject to the provisions of paragraph 5 of Article 48b of the CRD, prior to the Commission's adoption of a decision in accordance with Article 48b(2), the CAs shall classify TCBs as Class 1.	No amendments.
Expenditure sources	One respondent noted that most compliance expenditure will arise in the first 12–18 months after adoption of the final ITS. Key initial cost drivers include system architecture changes to integrate new	The EBA acknowledges the concerns raised by the respondent regarding the short implementation timeline and the significant compliance burden expected during the initial reporting phase. The EBA	In order to address these concerns, the EBA has introduced a number of simplifications. Most

	<p>templates into existing reporting software and data-governance frameworks, data lineage mapping to link EU branch reporting with head-office systems, often located in jurisdictions with different regulatory definitions and privacy rules, IT and staff training investments to ensure data quality and internal validation of new data fields, particularly qualitative HU information (business strategy, recovery plans, supervisory assessments).</p> <p>For the ongoing phase, the One respondent highlighted further costs from maintaining dual reporting cycles (EU ITS and home-country reporting), including parallel reconciliations, manual processing for non-standard qualitative HU templates (H 05.00–H 07.00), which cannot be fully automated, audit and assurance work, as many competent authorities are expected to request validation of figures originating outside the EU regulatory perimeter.</p> <p>One respondent also pointed out that although some obligations are not entirely new, CRD VI introduces additional requirements beyond the former ESRB recommendation (26 September 2019). TCBs will now need to report the largest recorded assets and liabilities originated by the TCB by sector and counterparty type, including exposures to the financial sector. HUs must also report on services provided through reverse solicitation to clients in the Union. These new elements will require enhanced record-keeping and reporting arrangements for both HUs and TCBs.</p>	<p>notes in particular the comments related to system architecture adjustments, data-governance alignment between EU branches and head-office systems, as well as the operational challenges arising from dual reporting requirements and qualitative templates.</p>	<p>notably, the EBA has postponed the first reporting reference date to March 2027, providing institutions with additional time to adapt their internal systems and processes. This adjustment directly responds to the issues raised by stakeholders and aims to ease the initial implementation burden.</p>
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Excessively broad input requirements	<p>One respondent noted that certain qualitative reporting requirements are overly broad and do not align with the standard DPM/XBRL validation process. They suggested reducing complexity and avoiding duplication by leveraging information already reported through head undertaking reporting, rather than introducing additional templates for similar data.</p>	<p>The reporting requirements derive from provisions set out in the CRD, which include elements of a qualitative nature. Similar approaches are already applied in other frameworks, such as the P3 Data Hub, where institutions submit qualitative information that does not fit into a DPM/XBRL format. Therefore, the inclusion of qualitative data in these templates is consistent with existing supervisory practices.</p>	No amendments.
Time burden, data currently not available	<p>One respondent noted that the complexity and cost of establishing the Annex II HU reporting framework – including data collection and the development of last-mile reporting infrastructure – are particularly burdensome for Class 2 TCBs, which generally have limited resources and less direct access to group-wide data. They added that these requirements will also pose a challenge for Class 1 TCBs, given the scale of coordination and system changes involved.</p>	<p>The CRD VI introduces a whole new regime for TCBs introducing this new requirement to report information on their HU, in accordance to Article 48k(2).</p>	No amendments.
<p><b>Question 6: In particular, are there challenges foreseen in obtaining detailed data on the head undertaking or other group entities, especially for Class 2 TCBs? Would further proportionality be helpful, especially regarding remittance date? How could it be implemented?</b></p>			

<p>Proportionality</p>	<p>One respondent noted that greater proportionality is needed in the reporting requirements, especially regarding reference dates and remittance deadlines for Class 1 and Class 2 TCBs. They highlighted that the quarterly remittance dates under Article 2 may fall before home-country filing dates (e.g. in the U.S.), meaning data may not be available by the EU deadline or may relate to different but comparable reference periods.</p> <p>One respondent also argued that the framework should better reflect the size and risk profile of TCBs. For Class 2 TCBs, they considered the proposals still onerous, and requested longer remittance deadlines and less granular reporting, particularly for small branches or those whose sole purpose is to access ECB funding.</p> <p>They further pointed out that the quarterly deadlines for templates H 01.00 and H 02.00 leave under six weeks after quarter-end to collect, validate, and transmit data, which places disproportionate pressure on Class 2 TCBs with limited staff and limited access to group systems.</p>	<p>EBA acknowledges that there may be differences between reporting schedules between the EU and third countries. Therefore, we propose to allow four more weeks for the remittance for the reporting of information on the HU in Annex 2 for both Class 1 and 2 TCBs.</p>	<p>The EBA has extended the remittance deadlines for Annex 2 by an additional one month in order to accommodate data availability constraints and to ease the operational burden on TCBs.</p>
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Proportionality/Granularity	<p>Two respondents noted that the granularity and scope of reporting should be reduced in line with the size, activities, and risk level of Class 2 TCBs, and that TCBs whose sole purpose is to access ECB funding should face more proportionate reporting requirements.</p> <p>Two respondents further highlighted that the new templates introduce substantial data-granularity requirements, requiring system integration work at headquarters. Even with timely preparation, TCBs and their headquarters are expected to face temporary operational challenges during the transition as systems and internal controls are adjusted to the new standards. They therefore recommended that temporary reporting delays during the initial implementation phase should not be treated as compliance breaches. They noted that similar supervisory tolerance was applied in earlier regulatory transitions (e.g. initial CRD IV reporting phases), acknowledging that technical readiness cannot be achieved immediately. One respondent also asked national competent authorities to refrain from enforcement actions for delays in HU information reporting within a reasonable transition period after CRD VI enters into force, provided such delays are temporary, duly documented, and promptly resolved once operational readiness is achieved.</p>	This question is outside of the scope of this ITS.	No amendments.
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Frequency of reporting	One respondent suggested that Class 2 TCBs should be allowed to submit all reports on an annual basis, rather than at more frequent intervals, at least during the initial years of implementation. They argued that this would ease the operational burden during the transition period and support a smoother adjustment to the new reporting framework.	The frequency of this ITS is aligned with the reporting by credit institutions. Restricting the reporting to an annual basis would bring very limited added value from a supervisory point of view, especially for areas requiring timely information (e.g. liquidity).	No amendments.
Feasibility and proportionality of reporting requirements for Third-Country Branches	One respondent noted that in some cases the relevant HU data may only become available after external audit processes in the home jurisdiction are completed, which can delay the provision of accurate information.	According to Article 2 of this ITS, Third-country branches may submit unaudited figures. Where audited figures deviate from submitted unaudited figures, the revised, audited figures shall be submitted without undue delay	No amendments.
	One respondent highlighted that most third-country groups prepare their consolidated financial statements only semi-annually or annually, which limits the availability of high-quality data for more frequent reporting cycles.	Regarding H 01.00, the requirement is not to consolidate the figures but to aggregate (to sum) the individual stand-alone figures (please refer to the instructions for H 01.00 and H 02.00.	No amendments.
	One respondent noted that templates H 01.00 and H 02.00 require aggregating assets and liabilities across all EU subsidiaries and EU TCBs of the same third-country group. They stressed that this assumes each TCB has (a) visibility over other group entities' EU exposures and (b) the ability to consolidate data using common accounting frameworks within the timelines set by the ITS – conditions that are often not met in practice.	Regarding template H 01.00, the EBA clarifies that the requirement is not to consolidate figures but to aggregate (sum) the individual stand-alone figures of the relevant entities, as specified in the instructions H 01.00 and H 02.00. For the purposes of completing templates H 01.00 and H 02.00, the TCB is expected to exchange all necessary information in a timely manner with the HU, subsidiaries, and other TCBs in the Union	No amendments.

<p>One respondent also highlighted that large international groups frequently operate decentralised systems with different accounting calendars, currencies, and internal reporting taxonomies. They noted that reconciling this data into a uniform format aligned with the EBA's DPM/XBRL requirements would demand significant manual effort and additional time.</p>	<p>belonging to the same third-country group. The EBA acknowledges that this coordination may be challenging in practice; therefore, additional time has been granted to TCBs for the submission of the HU reporting.</p>	
<p>One respondent observed that monthly or quarterly internal management data often does not follow IFRS or EU prudential definitions. As a result, TCBs must either rely on estimates or use partial information, which can reduce the reliability of the reported figures.</p>	<p>Monthly or quarterly internal management data may not follow IFRS or EU prudential definitions. Hence, TCBs must either rely on estimates or use partial information.</p>	<p>No amendments.</p>
<p>One respondent noted that even when the HU is subject to Basel III-equivalent standards, key supervisory data such as risk-weighted assets, leverage ratios, or liquidity metrics may still follow different definitions, creating inconsistencies when used for EU reporting purposes.</p>	<p>Information on the HU should follow the instructions for H 03.01, which refer to the Basel standards.</p>	<p>No amendments.</p>

<p>Feasibility and proportionality of reporting requirements for Third-Country Branches</p>	<p>The respondent noted that access to detailed entity-level prudential and financial data required in templates H 01.00 – H 07.00 may be restricted by corporate governance arrangements and local legal constraints. In some jurisdictions, confidentiality rules prevent the head undertaking from sharing supervisory reviews, recovery plans, or business strategies (as requested in H 05.00 – H 07.00 with their foreign branches. They stressed that TCBs cannot compel the head undertaking to provide such information, as they operate as dependent entities.</p>	<p>Question goes beyond the scope of this ITS.</p>	<p>No amendments.</p>
<p>Feasibility and proportionality of reporting requirements for Third-Country Branches</p>	<p>The respondent highlighted that where information on the head undertaking or group entities derives from home-supervisor assessments – such as supervisory reviews required under template H 05.00 – the HU may be legally prohibited from sharing such documents without explicit authorisation. They noted that any delays or omissions in transmitting this information would stem from jurisdictional restrictions outside the TCB’s control and should not be interpreted as non-compliance by the TCB.</p>	<p>Question goes beyond the scope of this ITS.</p>	<p>No amendments.</p>
<p><b><i>Question 7: Article 48h(1) of the CRD (as further developed in the RTS on booking arrangements) requires the maintenance of a registry book that allows to track and keep a comprehensive and precise record of all the assets and liabilities booked or originated. Have you foreseen that, in accordance with the proposed breakdown in columns 0050 and 0060 of template E 01.01, such a registry book should also allow you to distinguish between the originated amounts where servicing (or other type of continuing involvement) is maintained and the originated amounts where no continuing involvement is maintained at all?</i></b></p>			

<p>Breakdown in 0050 and 0060 in template E 01.01</p>	<p>Three respondents questioned the need for the registry book to distinguish between originated amounts with and without servicing or other continuing involvement for columns 0050 and 0060 of template E 01.01, noting that the Level 1 text does not require such a split and that it would exceed the mandate. They also raised broader concerns regarding the requirement to report originated assets and liabilities.</p> <p>One respondent added that assessing continuing involvement – especially for legacy or transferred assets – creates unnecessary complexity and presents practical difficulties, as TCBs may not have ownership or access to the information needed to determine whether originated assets or liabilities are ‘without any continuing involvement’. They further highlighted proportionality challenges, noting that current accounting frameworks (IFRS and national GAAP) do not always require a clear distinction between ‘retained’ and ‘fully derecognised’ assets, and that servicing arrangements may exist without implying risk transfer. One respondent warned that the proposed split could therefore lead to interpretational inconsistencies across Member States and TCBs, undermining comparability.</p>	<p>The EBA acknowledges that the requirement associated with columns 0050 and 0060 in template E 01.01 exceeds what is mandated in the Level 1 text. Taking this into account, and in line with the overall simplification efforts, the EBA agrees that these elements should not be required.</p>	<p>Columns 0050 and 0060 were removed from template E 01.01.</p>
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<p>Scope and feasibility of originated-items reporting</p>	<p>One respondent requested clarification of the requirement to record assets and liabilities originated, including whether it applies only to intragroup transfers, as previously raised in their response to EBA/CP/2025/16. They reiterated concerns that the distinction between ‘booked’ and ‘originated’ assets and liabilities remains unclear, and that this lack of clarity carries over into the reporting requirements due to insufficient guidance in the accounting framework and reporting instructions.</p> <p>They also emphasised that creating a registry book tracking the origination status and servicing condition of every asset and liability would require major adaptations to booking and data-warehouse infrastructures. For many TCBs, transaction-level data are held in global systems outside the Union, and mapping these to the template dimensions would require extensive systems development, reconciliation, and governance work. Aligning prudential reporting, accounting ledgers, and risk-management databases – currently not synchronised at the level of individual asset servicing status – would further increase complexity, which they considered disproportionate, especially for Class 2 TCBs.</p> <p>Finally, the respondent noted that identifying the existing stock of originated assets and liabilities prior to the start of reporting would be particularly challenging. They therefore requested that data capture and reporting obligations apply only to assets and liabilities originated after the application date, to allow adequate time to build the required tracking systems.</p>	<p>This question is outside of the scope of this ITS.</p>	<p>No amendments.</p>
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Reporting basis of point in time/cumulative aggregate	<p>One respondent noted that Annex I requires TCBs to report financial and regulatory information in accordance with IFRS or national accounting frameworks for the period from the first day of the accounting year to the reference date. They highlighted that the quantitative templates cover both balance sheet items (assets and liabilities) and income statement items (such as net revenues, interest income, and interest expenses).</p> <p>One respondent stated that it is unclear whether these templates require the outstanding stock of balance sheet items at the reference date or a cumulative aggregate of items originated during the period. They warned that this ambiguity could lead to inconsistent reporting practices, undermining the comparability and usefulness of the data collected.</p>	<p>Templates E 06.01 and E 06.02 shall be reported cumulatively from the first day of the accounting year to the reference date.</p> <p>The qualitative data regarding assets and liabilities shall be reported in alignment with the requirements for financial reporting purposes.</p>	No amendments.
<b>Question 8: Do you have any specific comment regarding templates E 01.01/E 01.02 and their instructions?</b>			
Scope of application	<p>One respondent argued that template E 01.01 and the draft RTS on booking arrangements incorrectly imply that the reporting requirement applies to all transactions, including those with non-group entities and third parties. They stated that this goes beyond the intention of the Level 1 text, which – under Article 48h(4)(b) of CRD VI – requires keeping records only of assets and liabilities originated by the TCB and booked or held in other group entities (TCBs or subsidiaries) within the same group, particularly where the TCB has been materially involved in setting up the transaction.</p> <p>One respondent therefore emphasised that reporting</p>	This question is outside of the scope of this ITS.	No amendments.

	in template E 01.01 should be limited to intragroup transfers, as extending the requirement to all transfers or sales to third parties exceeds the mandate of Article 48h. They urged the EBA to amend the ITS and associated RTS to ensure the requirement covers only transfers and sales to other group entities, consistent with both the Level 1 text.		
Clarity on instructions	One respondent requested greater clarity in the reporting instructions, particularly on whether the required figures should be provided on a point-in-time basis or as a cumulative aggregate, noting that the reporting basis is not clearly defined.	<p>Templates E 06.01 and E 06.02 shall be reported cumulatively from the first day of the accounting year to the reference date.</p> <p>The qualitative data regarding assets and liabilities shall be reported in alignment with the requirements for financial reporting purposes.</p>	No amendments.
<b>Question 9: Do you have any specific comment regarding template E 02.00 and its instructions?</b>			
N/A			
<b>Question 10: Do you have any specific comment regarding templates E 03.01/E 03.02 and their instructions?</b>			
N/A			
<b>Question 11: Do you have any specific comment regarding templates E 04.01/E 04.02 and their instructions?</b>			
N/A			
<b>Question 12: Do you have any specific comment regarding templates E 05.01/E 05.02 and their instructions?</b>			
N/A			
<b>Question 13: Do you have any specific comment regarding templates E 06.01/E 06.02 and their instructions?</b>			
N/A			
<b>Question 14: Do you have any specific comment regarding templates E 07.01/E 07.02 and their instructions?</b>			
Timelines	One respondent requested clarification regarding template 07.01, noting that some balances are required annually while other information must be reported quarterly. They asked the EBA to specify whether firms are expected to resubmit the previously	Please refer to Annex in the Final Report.	EBA included an Annex to the Final Report with practical examples.

	reported annual data each time the quarterly data is submitted.		
<b>Question 15: Do you have any specific comment regarding templates E 08.01/E 08.02 and their instructions?</b>			
N/A			
<b>Question 16: Do you have any specific comment regarding templates E 09.01/E 09.02 and their instructions?</b>			
LCR template requirement for Class 1 TCBs and related concerns on CRR alignment	The respondent welcomed the fact that the ITS require only a summary LCR template for Class 1 TCBs rather than the full CRR LCR reporting package. However, they cautioned that the absence of the detailed CRR templates may result in deviations from a CRR-consistent calculation, as key elements for position determination, allocation logic, and delimitation are missing. They therefore requested more precise instructions aligned with the CRR framework to ensure consistent allocation, consolidation, and interpretation of LCR items.	The EBA acknowledges the request for clearer guidance to ensure that the summary LCR template is applied consistently and in line with the CRR definitions.	The instructions have been amended to provide the necessary clarifications.
<b>Question 17: Do you have any specific comment regarding template E 10.00 and its instructions?</b>			
N/A			
<b>Question 18: Do you have any specific comment regarding template H 01.00 and its instructions?</b>			
N/A			
<b>Question 19: Do you have any specific comment regarding template H 02.00 and its instructions?</b>			
Scope of entities reported	One respondent expressed concern about the broad scope of reporting required in template H 02.00, which asks for information on all EEA subsidiaries and branches of the third-country group, regardless of whether they are financial or non-financial entities. They argued that this approach goes beyond what is necessary for the effective prudential supervision of	The scope of reporting is derived from the provisions of the Level 1 text. However, the EBA acknowledges that the requirement to report all subsidiaries in the Union of a TCG on an entity-by-entity basis may represent a substantial reporting burden. Taking this into consideration, and in line with the overall	Templates H 01.00 and H 02.00 have been amended.

	<p>TCBs and risks creating a substantial reporting burden, particularly for large groups with numerous entities. Many of these entities fall outside the prudential supervisory remit of banking regulators, meaning the requirement may generate irrelevant or noisy data that does not contribute to supervisory objectives.</p> <p>One respondent emphasised that the scope should instead be aligned with the prudential consolidation boundary, consistent with the EBA's own final draft RTS on prudential consolidation, which limit inclusion to institutions, financial institutions, and ancillary services undertakings. They suggested that focusing on this set of entities would ensure that the data collected is relevant for assessing prudential risks and the interconnectedness of the third-country group's financial activities within the EU, while avoiding unnecessary and disproportionate reporting obligations.</p>	<p>simplification efforts, the EBA has revised the reporting template to address these concerns.</p>	
<p>Clarification on applicable accounting frameworks for reporting</p>	<p>One respondent highlighted that the reporting instructions do not clarify whether the GAAP of the ultimate HU may be used as the basis for preparing the underlying EEA legal-entity assets and liabilities required in the templates.</p>	<p>Instructions for H 02.00 have been amended to clarify that the same accounting standard applied by the entities for supervisory reporting in the respective state of establishment shall be used.</p>	<p>Instructions for H 02.00 were amended to clarify that the same accounting standard applied by the entities for supervisory reporting in the respective state of establishment shall be used.</p>

<p>One respondent requested clarification that the reference to ‘or with national accounting frameworks’ in Article 1(2) of the draft ITS would permit an overseas banking group to apply uniform reporting standards across all its branches and subsidiaries, e.g. allowing a U.S. banking group to apply U.S. GAAP irrespective of the location of the entities. They asked the EBA to clarify that ‘national accounting frameworks’ should not necessarily mean the domestic accounting framework of the branch’s or subsidiary’s jurisdiction.</p>	<p>The wording of Article 1(2) of the draft ITS has been adjusted to align with the requirement set out in Article 48k(1) of the CRD.</p>	<p>Amended Article 1(2) of the ITS to align with the wording in the CRD.</p>
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**Question 20: Do you have any specific comment regarding templates H 03.01/H 03.02 and their instructions?**

<p>Duplication and remittance to date flexibility</p>	<p>One respondent suggested that, in line with Article 1(3) of the ITS – which already allows adjusted reporting reference dates where TCBs report based on a non-calendar accounting year – similar flexibility should apply where the head undertaking is permitted by its home supervisor to submit regulatory metrics based on fiscal rather than calendar quarters. In such cases, one respondent argued that the HU’s metrics should be reported as of the same reference period end used for home-country supervision.</p>	<p>EBA acknowledges the response and adjust accordingly.</p>	<p>Articles 1(3) and 2(3) were adjusted to accommodate different financial year ends for HU.</p>
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**Question 21: Do you have any specific comment regarding template H 04.00 and its instructions?**

Reverse solicitation	<p>One respondent considered the scope of template H 04.00 on services provided on the basis of reverse solicitation to be excessively broad, impractical, and misaligned with the operational realities of international banking groups. They stressed that requiring reporting at the level of the ultimate head undertaking (ultimate HU) is inappropriate, as ultimate HUs are often financial holding companies encompassing non-banking entities subject to different regulatory frameworks and lacking visibility over reverse-solicitation activities. One respondent therefore requested that reporting be restricted to the immediate HU directly linked to the activities of the TCB in the relevant EEA Member State.</p> <p>One respondent also highlighted that paragraph 11 of the consultation creates ambiguity by implying that reporting applies at the level of the entire third-country group, whereas Article 48k(2)(f) and template H 04.00 clearly apply the obligation only to the head undertaking, not the entire group. They therefore asked for clarification and revision of the instructions.</p> <p>One respondent emphasised that determining ‘associated net revenues’ for reverse solicitation is particularly burdensome, as such figures are heavily influenced by internal transfer pricing policies and cost-allocation methodologies. These do not align with the granular, attributable revenue data sought by the template, making extraction inconsistent, highly manual, and prone to misrepresentation across institutions with different accounting practices. One respondents requested clearer guidance on the</p>	<p>EBA acknowledges that this template should be reported for the same HU as for the purpose of points (b) to (f) of Article 48k(2) of the CRD. Moreover, EBA acknowledges that parts of the template would be very burdensome and not practical. Therefore, the breakdown per EEA country has been removed, as well as columns related to revenues. The HU reverse-solicitation reporting shall apply to transactions, regardless of whether they have originated before or after the entry into force of CRD VI.</p>	<p>EBA removed the referenced to ultimate HU in instructions. Moreover, we removed the breakdown for EEA countries and columns related to P&amp;L. The package has been carefully revised and significantly reduced in light of the comments received and the simplification efforts.</p>
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	<p>definition and calculation of associated net revenues, including whether values should be point-in-time or period-based.</p> <p>They further noted that extending reporting to services provided by HUs to clients in other EEA countries, or to other group entities, would create redundant and irrelevant reporting, increasing burden without supervisory value. One respondent requested deletion of the entries for the first and second EEA Member States, noting that these add no meaningful insight and merely reflect the size of the largest EU financial markets. One respondent also warned that the scope and extent of the reverse-solicitation reporting requirements exceed those applied to EEA subsidiaries and could impose compliance costs significant enough to drive TCBs out of EEA lending markets, reducing liquidity, limiting access to credit for EEA borrowers, and increasing borrowing costs.</p> <p>Finally, one respondent asked the EBA to clarify that obligations related to HU reverse-solicitation reporting should apply only to transactions entered into after the application of Article 21c, and should not apply retrospectively, in line with proportionality and operational feasibility.</p>		
<p>Scope of consolidation</p>	<p>One respondent noted that it is unclear whether the EBA expects the report to be prepared on a consolidated basis for all non-EU undertakings within the group. They remarked that such an approach would exceed the mandate under CRD VI, contrasting it with Article 21c(2), which only envisages Member</p>	<p>In template H 04.00, the requirement is not to consolidate the figures but to aggregate (to sum) the individual stand-alone figures.</p>	

	<p>States requiring information to monitor reverse-solicitation services provided in their territory by third-country undertakings within the same group, rather than requiring group-wide consolidation.</p>		<p>No amendments.</p>
<p>Scope of reverse-solicitation reporting</p>	<p>One respondent argued that the reporting obligation for reverse-solicitation services should be limited to those provided by the immediate head undertaking and directly linked to the activities of the TCB in the specific EEA country where it is established. They stated that extending the scope to include group entities ‘up the chain’ or aggregating services provided by the HU to clients in other EEA countries creates an undue reporting burden and risks generating redundant or irrelevant data.</p> <p>They further noted that because the TCB is the designated reporting entity, the template should focus only on reverse-solicitation services provided to clients in the Member State where the TCB operates, and only where such services are directly facilitated or influenced by that TCB. This, they argued, would ensure that the information reported is relevant to supervisory oversight, aligned with the TCB’s actual role in the HU’s reverse-solicitation activities, and avoids imposing disproportionate requirements that extend beyond the TCB’s direct supervisory remit</p>	<p>In template H 04.00, the requirement should be aligned with the definition of HU in accordance with the CRD.</p>	<p>Instructions for template H 04.00 have been amended accordingly.</p>

Home-supervisor data basis	<p>One respondent requested confirmation in the ITS that any data reported on behalf of the head undertaking may be provided in accordance with the requirements of the HU's home supervisor, rather than being recalculated or reformatted to meet separate EU-specific standards.</p>	This question is outside the scope of this ITS.	No amendments.
Proportional Application and Clarification	<p>One respondent noted that the draft ITS should better reflect how template H 04.00 is to be applied proportionately to third-country banking groups. They observed that the consultation paper's example structure (Section 3.2, Figure 1) assumes the ultimate head undertaking is a bank with only banking subsidiaries or branches beneath it, and does not consider situations where the ultimate parent includes non-banking entities or is a bank holding company.</p> <p>One respondent further highlighted that the requirement to report on reverse solicitation applies only to third-country groups with TCBs in the EU, and not to groups operating solely through subsidiaries or without any EU presence. They warned that this asymmetry could negatively affect the diversity of the EU banking system and discourage the use of EU-based TCBs, ultimately reducing funding for EU businesses.</p> <p>They therefore suggested that the EBA and the European Commission consider applying this requirement more proportionately, for example by limiting it to entities within the head undertaking that</p>	<p>The requirement to report the services provided by the head undertaking to clients established or situated in the Union on the basis of reverse solicitation of services in has been set in accordance with Article 48k(2) of the CRD, as well as the whole reporting on the HU. Nevertheless, H 04.00 has been significantly streamlined and the reference to the ultimate HU has been adjusted.</p>	No amendments.

	are both lending and deposit-taking institutions, thereby reducing unnecessary costs and burdens.		
<b>Question 22: Do you have any specific comment regarding template H 05.00 and its instructions?</b>			
Legal barriers to disclosure of supervisory information	The respondent noted that some firms, particularly those subject to U.S. confidentiality laws, are legally prohibited from disclosing confidential supervisory information and would therefore be unable to provide the data requested in template H 05.00 without breaching domestic requirements. They requested that the reporting instructions and templates be adapted to accommodate such legal constraints, allowing TCBs to engage with their national competent authority to explain the impediment and to submit either a null report or an indication that disclosure is legally restricted.	This question is outside the scope of this ITS.	No amendments.
Alternative mechanisms for information exchange	The respondent recommended that, where legal restrictions prevent a TCB or HU from directly disclosing the required information, EU regulators should obtain such data through existing Memoranda of Understanding (MoUs) with the relevant non-EU supervisory authorities.	This question is outside the scope of this ITS.	No amendments.
<b>Question 23: Do you have any specific comment regarding template H 06.00 and its instructions?</b>			
Frequency of reporting	One respondent noted that Class 1 TCBs are required to submit the Recovery Plan information requested in H 06.00 semi-annually, whereas Class 2 TCBs are required to submit annually. One respondent requested that the reporting frequency is amended to annual submission for both Class 1 and Class 2 TCBs, to align with BRRD and ECB Recovery Planning requirements for EU banks, as well as standards globally.	According to Article 48l(2) of the CRD, the regulatory and financial information referred to in Article 48k shall be reported at least twice a year by Class 1 third-country branches and at least annually by Class 2 third-country branches. For templates H 05.00, H 06.00 and H 07.00 if the HU has made no changes to the significant supervisory reviews and assessments, recovery plans or business strategy, TCBs shall submit the same information as in the previous reporting period.	No amendments.

<p>Efficient consolidation of recovery plan information</p>	<p>The respondent noted that sharing a head undertaking's recovery plan may also be subject to confidentiality restrictions, and therefore EU supervisors should request this information directly from the home-state regulator rather than from the TCB or HU.</p>	<p>This question is outside the scope of this ITS.</p>	<p>No amendments.</p>
<p><b>Question 24: Do you have any specific comment regarding template H 07.00 and its instructions?</b></p>			
<p>N/A</p>			

