

EBA MB 2026 045 rev. 1

Management Board

19 February 2026 / 09:00 – 12:45

Location: teleconference

Management Board

Minutes of the conference call on 19 February 2026

Agenda item 1: Welcome and approval of the agenda (for decision)

1. The EBA Vice-Chairperson welcomed the Members of the Management Board (MB). He reminded the Members of the conflict-of-interest policy requirements and asked them whether any of them considered themselves as being in a conflict. No Member declared a conflict of interest.
2. The Vice-Chairperson announced that the second mandate of Kristine Cernaja-Mezmale has started on 27 January 2026 for two and half years.
3. The Vice-Chairperson informed that the Minutes of the 20 January MB conference call were circulated to the MB in the written procedure.
4. The Members did not raise any comments on the agenda.

Conclusion

5. The MB approved the agenda of the conference call by consensus.

Agenda item 2: Follow-up to TFE recommendations: general overview

6. The Vice-Chairperson introduced the item by clarifying the intent behind bringing the MB together earlier than initially planned. This decision was made by the EBA to provide an opportunity for the Members to review and discuss the progress achieved so far in implementing the recommendations set out by the Task Force on the Efficiency (TFE) of the Regulatory and Supervisory Framework. He emphasised that particular attention would be given to the short-term milestones that lie ahead. Additionally, the discussion would include an update on the internal project steering dashboard, which serves as a tool for monitoring the status and advancement of these recommendations.
 7. The Executive Director introduced the item intended to provide an overview to the MB on the progress of TFE Recommendation implementation. In addition, he mentioned the
-

recently published European Commission's (EC) Consultation on the competitiveness of the banking sector to which the EBA may input as there were interlinkages between its scope and TFE Recommendations.

8. The EBA Acting Head of Governance and External Affairs Unit (GEA) continued by providing a comprehensive overview of the ongoing progress relating to the implementation of all TFE Recommendations as per four clusters - regulatory products, reporting, holistic picture, and internal organisation. She acknowledged that, whilst significant advancement had been made in certain areas—particularly regarding regulatory mandates— some deliverables in other clusters remained in the preliminary phases. In these areas, efforts were towards mapping out concrete deliverables and formulating detailed action plans to guide future work. She listed several short-term milestones leading up to the BoS Strategy Day, scheduled for July 2026. These milestones were intended to ensure that progress remained on track in line with strategic priorities. The Head of GEA drew attention to the recently published EC Consultation on the competitiveness of the banking sector and emphasised that the EBA, along with the other ESAs, had been invited to contribute input to this Consultation. She further highlighted that there were notable intersections between the themes addressed in the Consultation and the TFE Recommendations, underlining the relevance and timeliness of the EBA's work in this regard. The Head of GEA concluded by showing an internal dashboard developed to monitor the implementation of TFE Recommendations. This dashboard was also organised into four main clusters: regulatory products, reporting, holistic picture, and internal organisation. Through this structured approach, the EBA was able to systematically track progress and ensure effective implementation across all areas of focus.
9. The Members expressed their appreciation for the detailed overview of the progress on the implementation of the TFE Recommendations. One Member called for better coordination in the sequencing of meetings/conference calls of the MB, BoS and respective working sub-structures. Another Member welcomed increased possibility for steer on experts' level work. The Members asked for more targeted external communication on this work. One Member stressed that tangible outcomes were expected from the industry and that the EBA may need to consider how to externally communicate on the work already completed. The Member asked for further work on Recommendation 18 and questioned whether a report on the implementation of that Recommendation would be submitted to the BoS for discussion. With regard to the EC Consultation, one Member was of the view that it was needed to distinguish the scope of work that was in the EBA's remit from L1 requirements and said that the response to the Consultation should be prepared at the BoS and as a summary of the work done so far. The Member also raised concerns on the practical aspects of the top-down steer and noted that it would have to further developed and transparently communicated to the working sub-structures as many policy discussions were held at the experts' level rather than at the BoS' level.

10. The EC representative followed up on the reference to the EC Consultation and said it was a part of the EC work on the Report on the competitiveness of the EU banking sector and would subsequently feed into legislative proposals. He stressed that the fragmentation of the environment in which banks currently operated has been one of the main EC's concerns. With regard to the overview of the implementation of the TFE Recommendations, the EC representative was of the view that the work on Recommendation 14 could progress more rapidly.
11. The Head of GEA confirmed that the overview of the work progress would be presented at the BoS conference call on 18 March 2026, including action plan for the implementation of Recommendations 20 and 21 related to the EBA governance.
12. The Executive Director informed that an update on Recommendations 14, 18, 20 and 21 would be presented during the March BoS conference call. This also included an overview of all working sub-structures and their work programme for 2026, including priorities identified for each standing committee. He clarified that the sequencing of ad hoc meetings and conference call aimed at addressing concerns of slower delivery on the Recommendations and to allow discussions on various levels. On external communication, the Executive Director confirmed that the EBA has been preparing a communication plan. He also pointed out that the materiality assessment methodology (TFE Recommendation 1) has been already used during the PSD3/PSR legislative process resulting in a significant decrease of EBA's mandate. He concluded by confirming that an overview of the work on the implementation of the TFE Recommendations would be presented to the BoS at the end of the implementation process and that the response to the EC Consultation, summarising the work done in the respective areas, would be prepared at the BoS level.
13. The Vice-Chairperson concluded by noting the comments by the Members and said that the top-down guidance was one of the issues that would require further discussion at the BoS. He highlighted a need for a good communication strategy on the EBA's deliverables under the TFE Recommendations.
14. **Agenda item 3: TFE recommendations follow up – Holistic picture and discussion on stacking orders (for discussion)**
15. The Director of Prudential Regulation and Supervisory Policy Department (PRSP) opened the discussion by reminding Members of the work done on the complexity of the capital framework for credit institutions in 2024 and 2025. Given the EBA's regulatory role in the EU—covering both ongoing (micro and macro measures) and gone concern regulation—and the EC's commitment to publish its Competitiveness report for financial services in autumn 2026, the EBA's objective was to release a comprehensive report by June 2026 in accordance with the BoS request, thereby informing the EC's future work. The Director of PRSP summarised the January 2026 BoS meeting discussion, noting broad support for the refined problem statement, analysis of members' options, and defined next steps. The

BoS strongly preferred to narrow proposals to a subset that aligned with the four principles established for this initiative and ensured holistic consistency. Consequently, the EBA was tasked with developing a genuine “EBA Board” range of options, which may not include all members’ suggestions in full if they did not meet these principles, while also considering potentially more effective alternatives. She pointed out that as outlined in the refined problem statement, it was essential to examine how concerns about the current framework’s implementation related to governance, specifically the roles and cooperation among involved authorities. Addressing these concerns required closely identifying the purpose and objective of each stacking order element. She also mentioned that the framework aimed to cover for the three objectives: microprudential, macroprudential, and resolution stacks. For each objective, a Pillar 1 requirement ensured a baseline level of solvency, resilience against system-wide events, and resources for resolution, respectively. Pillar 2 requirements were designed to address bank-specific risks, cycle-dependent aspects, and features and challenges related to resolvability. The Director of PRSP outlined the next steps, emphasising that the report on TFE recommendation 9 should be prepared for publication by June 2026. The process involved a discussion at the BoS meeting on 18 March to outline the report and its key elements, a second discussion in April to review the first draft, and finalisation in June. She added that the work may benefit from parallel efforts aligned with TFE Recommendation 14, which aimed to enhance effectiveness of the coordination between authorities from various perspectives to optimise efficiency for both authorities and supervised entities, and to promote a holistic approach. Improved coordination between different types of authorities was particularly relevant in setting capital requirements. The Director of PRSP presented a timeline for implementing the Recommendation 14, focusing on the short-term horizon (2026) established in the TFE report. Initial expert discussions addressed three key aspects: the areas most relevant for enhanced coordination (what?), the authorities involved (who?), and the most appropriate methods for organising such coordination (how?). The proposed approach would be tested in pilot cases for a select group of institutions in the Spring, refined based on outcomes, and the way forward determined. The Director of PRSP concluded by emphasising that the EBA conclusions on cooperation would stand as an independent document, serving as input for the EC’s future work, in alignment with TFE recommendation 9 output but separate and rather planned for end 2026.

16. The Members expressed support for the proposed outline of the stacking order report. They emphasized the importance of clarifying the connections between microprudential and macroprudential requirements, as well as providing a clear explanation of the roles of Pillar 1 and Pillar 2 within the report. One Member requested additional information regarding the pilot cases effort, seeking details about its content and the overall process while highlighting the need to draw on appropriate locally run experiences. Furthermore, two Members pointed out that, while greater coordination among authorities could be advantageous, national regulatory and supervisory requirements often significantly affect banks’ operability. One Member recommended that less tools should coexist and that the

EC consider the use of buffers at Level 1. Another Member urged the EBA to develop a strong, ambitious, and concrete proposal on buffers, and noted that buffer duplication frequently served as a political tool rather than a market-based one.

17. The EC representative shared mixed views regarding the proposed structure of the stacks, i.e. a Pillar 1 and a Pillar 2. He emphasized that Pillar 2, being specific to individual banks, should not be included in the macroprudential framework. He called for straightforward proposals addressing issues across the different objectives, horizontally. In addition, he advocated for limiting national practices in areas where EU or SSM requirements already exist and urged for faster progress in the work.
18. In response, the Director of PRSP acknowledged the need to accelerate the work. She provided clarification on the pilot exercise, explaining that its methodological component would be restricted to structuring discussions with a small subset of banks. She also highlighted the necessity for broadening the whole set of proposals across the objectives and their respective interactions, micro/ macro and resolution with their triggers in light of finalising the report.
19. The Executive Director elaborated on the pilot exercise, noting that it would consist of two rounds. The first round would involve a limited group of banks, while the second round would facilitate discussions with a small group of C/D/RAs and banks.
20. The Vice-Chairperson concluded by noting the steer from the Members on acceleration of work and further reflection on Pillar 2.

Conclusion

21. The MB supported the presented outline of the report by consensus.

Agenda item 4: TFE recommendations follow up – Reporting (for discussion)

22. The Vice-Chairperson reminded the Members that during the January meeting, the BoS discussed largely the simplification of the EBA reporting requirements, with the emphasis on the simplification measures aimed at streamlining the existing EU and national reporting requirements, to be incorporated into the upcoming consultation paper on the revisions of the ITS on supervisory reporting. The BoS provided guidance and top-down steer based on which the EBA was finalising the proposal of the consultation paper to be discussed at the experts' level. A draft consultation paper would be presented for the BoS discussion at its March meeting. The Vice-Chairperson added that the MB was asked now to provide top-down steer on a number of other reporting simplification aspect, notably in relation to building public repository of data requests and change management. This steer would enable the EBA to continue its efforts, especially regarding the development of a public repository for data requests and the formulation of proposals for the BoS in the area of change management.

23. The EBA Director of Data Analytics, Reporting and Transparency Department (DART) continued by providing status update on implementation of five TFE recommendations. With regard to Recommendation 4 on integrated reporting, she said that the work continued under the Joint Bank Reporting Committee (JBRC) according to the workplan and that in 2026, the focus was on semantic integration (glossary) and starting a discussion on common data dictionary and other building blocks for an integrated reporting system. On Recommendation 5 (Reduction of reporting), the Director of DART said that following the BoS discussion on 27 January 2026, the work on the preparation of the consultation paper on revisions to the ITS on supervisory reporting was continuing with an aim to present the draft consultation paper to the BoS in March 2026. The consultation paper would include simplification measures in FINREP, liquidity and asset encumbrance, leverage ratio, market risk and FRTB, operational risk losses, and would also feature introduction of the ESG reporting and integration of EU-wide stress testing.
24. The EBA Senior Policy Expert (Expert) provided an overview of preparatory work on the establishment of the public EU data request repository. He said that the EBA Staff has performed the preliminary feasibility assessment of the solutions that could be used to build the EBA database by the end of the year with minimal recourse and budget implications, and presented a high-level functional requirement which he summarised. If agreed by the MB, the database could be built by September and the CAs and RAs onboarded to use it noting that most users already have access to the EBA SharePoint. This would allow for the data to be collected and published in Q4 2026. He noted that there were parallel discussions with the ECB to find a practical way forward with co-existence of the EBA and the ECB/SSM database noting that the functional needs on the side of the ECB/SSM are much wider. As the focus was on a simple solution to be ready by the end of the year, not all functional requirements of the ECB could be addressed which would result in coexistence of the two databases. Alternative would be to have a more sophisticated solution to be developed by the EBA, but this would require more time and resources. The Expert clarified that ECB/SSM repository would cover entire SSM and offer functionality needed for the approval of ECB-own and SSM NCA data requests, while the simple EBA repository would cover the whole of the EEA. Regarding the submission of data, he explained that non-SSM CAs and all RAs, including SRB, would feed data to the EBA database. SSM CAs would report to the ECB, and the ECB would feed all the SSM data into the EBA database. This sequential approach would optimise the workload for the SSM CAs and the EBA staff and would also ensure better quality of data as would eliminate the need to reconcile the data provided by the ECB and the SSM CAs. However, this approach would need to be formally confirmed with the ECB. The Expert confirmed that all instructions, specifications and definitions of data fields would need to be fully aligned between the EBA and the ECB and enforced on CAs and RAs through the Guidelines setting the common rules for making and designing data requests by the CAs and RAs. The Expert further presented the outline of these guidelines supporting the implementation of the repository and adding to the better coordination between the CAs and RAs when making data requests. The draft guidelines would be submitted to the BoS in Q3 2026.

25. The Director of DART continued by referring to Recommendation 8 on Change management and explained the main challenges were balancing stability of requirements and the need to fit reporting to underlying changing regulations as well as allowing adequate implementation time and providing timely information to supervisors. She informed that the EBA has collected a first wave of ideas/requests from the industry and was planning to have a workshop to further discuss the topic. The workshop to be organised after the publication of the consultation paper would cover the proposals from the consultation paper and also change management. She noted that whilst some of the industry ideas could be implemented and have been already considered by the EBA (e.g. workshops, better explanations, improving predictability) others require significant rethink also considering additional EBA/CA resources or institutional responsibilities and the overall legislative process (e.g. wider JBRC involvement into the development process) or adding pressure on ensuring adequate implementation time. As a related measure, the Director of DART pointed out that in relation to change management, one specific proposal that may be considered and that was already discussed by the TFE was the introduction of a moratorium on changes to the reporting requirement. She also clarified that to be effective, the moratorium would need to ban any changes to the existing reporting or new reporting, including national data requests, which would mean that the EBA would not be able to implement already planned simplification work on funding plans, remuneration or the review of the securitisation framework following the Level 1 package currently under finalisation.
26. The Members supported the work. With regard to the change management, one Member was of the view that the proposal and its associated timelines could be further refined, specifically by shortening the delivery time of the simplification measures. The Member also noted that, while the proposed simplification measures within the EBA reporting framework were positive, the integration of EU-wide stress testing data needs should not put new burden on the banks that were not involved in the EU-wide stress test. Furthermore, the Member noted that within the change management initiatives the EBA should consider issuing reporting requirements or introducing changes only twice a year based on a pre-defined calendar. Another Member mentioned the integrated reporting initiatives of the ECB and stressed that the EBA should take these developments into account. On repository, one Member supported the sequential approach but stressed the need for transparency in structuring and managing related processes. The Member proposed introducing two cut-off dates for introducing changes into reporting requirements, for example in January and in June. The Member further suggested to look into possibility of having structured and regular engagement with the industry on reporting issues through an annual workshop. Several Members also highlighted the importance of technological innovation and the move towards granular reporting under 'report once' principle. One Member also echoed earlier remarks that the change management proposals should be more ambitious, especially in relation to the overall reduction in the EBA reporting requirements. The Member supported the introduction of a moratorium after 2027 for at least a year.

27. The EC representative welcomed the idea of introducing cut-off dates and said that this proposal should be further discussed at the BoS level. He also noted that the CRR already had a requirement of minimum 6-months implementation period, so introducing changes twice a year would be in line with that.
28. The EBA Director of Economic and Risks Analysis Department (ERA) clarified that the EBA planned 25 % reduction of data points for stress test exercise as well as shift from ad hoc data requests to regular data collections with an aim to improve data quality. He also explained that the extension of reporting templates would focus on banks within the scope of the stress test exercise.
29. The Executive Director highlighted the operability of the repository and the approach in which one data repository would feed into another repository. He also supported the proposal for two cut-off dates.
30. In her response, the Director of DART explained that setting January and June as cut-off dates could potentially delay the implementation of the current simplification plans. She highlighted the need for clear communication on planned changes to increase predictability and close cooperation with the ECB and indicated that the EBA was planning further proposals to reduce reporting obligations in the coming years.
31. The Vice-Chairperson concluded by noting the comments raised by the Members on the ambitious plan for the change management and two fixed cut-off dates per year and support by the Members on the high-level functional requirements and cooperation approach with ECB and further work on the guidelines on preparing and making data requests.

Conclusion

32. The MB supported the high-level functional requirements for the EU-wide public data request repository, and proposed approach to close cooperation with the ECB by consensus.
33. The MB supported further work on the guidelines on preparing and making data requests.
34. The MB called for ambitious time plan with respect to change management proposals and supported for the consideration of the two fixed dates for making changes/new requirements.

Agenda item 5: TFE recommendations follow up – Supervisory convergence – new approach (for discussion)

35. The Vice-Chairperson pointed out that many of the TFE recommendations related to ensuring that the regulatory framework remained fit for purpose and simplifying it. Two of the recommendations instead focused on rebalancing away from regulation as the

solution to delivering a single market in the banking/payments sector, to carrying out more supervisory convergence.

36. The EBA Head of Legal and Compliance Unit (LC) continued by clarifying that the TFE Recommendation 19 proposed a significant reorientation of how the EBA, together with CAs, structured, prioritised and resourced its supervisory convergence work. He noted that Recommendation 17, which focused on improving external transparency, has already been partially implemented: the EBA published its first comprehensive annual supervisory convergence report in October 2025. However, he emphasized that the full achievement of Recommendation 17 remained largely dependent on the outcomes of Recommendation 19. The Head of LC presented the EBA's proposal for a new Supervisory Convergence Framework. This framework aimed to bring greater clarity and efficiency to convergence work by formally defining supervisory convergence; establishing a uniform approach to identifying risks; setting priorities and selecting appropriate tools; and clearly distinguishing between regulatory tasks and convergence activities. He invited Members to provide guidance on the overall ambition of the framework and the tools that should be used in its implementation. As part of the new framework, the proposal included establishing a model for prioritising and risk-assessing supervisory convergence work. This involved repurposing the relevant section of the EBA priorities document, which currently outlined the USSPs and related supervisory priorities, as well as the peer review work program. The intention was to initiate more structured evidence collection to identify where convergence gaps existed and to assess their impact. The Head of LC requested feedback from Members on methods for measuring both current and adjusted resources allocated to regulatory deliverables and convergence activities. He also sought their expectations regarding the extent of any shift in focus from regulatory work towards convergence efforts. He then reflected on potential governance and structural changes that could support the convergence work. He concluded by raising the question of how closely future convergence work should be integrated with regulatory drafting, so that supervisory expectations are identified ex ante rather than identifying them ex post when a convergence activity begins. This was especially relevant considering that peer review exercises have highlighted the challenges of retrospectively identifying supervisory benchmarks for assessment.
37. The Members confirmed the aim of moving towards more ex post convergence work in place of regulatory work and were of the view that the scope of the proposals for the supervisory convergence framework should be further refined and streamlined. One Member suggested prioritising digital finance and other emerging areas as focal points for the framework. In contrast, another Member emphasised the importance of ensuring that ex post activities did not inadvertently lead to the creation of additional Level 3 regulation. This Member also requested greater clarity regarding the organisation of tasks, the methodology to be adopted, and the allocation of resources for this work.

38. The EC representative recommended that, as an initial step, the EBA should provide a clear definition of supervisory convergence and articulate its expectations regarding deliverables. Furthermore, he suggested that the EBA should address the conduct of supervisory authorities as well as the practices observed at the national level. The EC representative also highlighted the need for the EBA to not only act as a coordinator and facilitator of cooperation but also to establish robust positions and ensure their implementation.
39. The Executive Director welcomed the ongoing discussion and noted that the current utilisation of available tools, such as peer reviews, had not led to significant new regulatory proposals, nor had it indicated that such changes were unnecessary. He proposed that the tabled proposals should continue to be discussed at the BoS level, with particular emphasis on defining appropriate tools for specific areas of work.
40. The Vice-Chairperson concluded by noting the comments by the Members and emphasised the need for the EBA to further investigate how it could most effectively employ its regulatory tools to achieve clear and measurable outcomes.

Agenda item 6: Update on the Supervisory Independence Guidelines (for discussion)

41. The Head of LC reminded the Members that the draft Guidelines on Supervisory Independence, to be issued by 10 July 2026, have been the subject of a two-month consultation period which ended on 23 January 2026. The EBA has received three substantive contributions, analysed them and prepared a draft Final Report, proposing some slight adaptations to the text.
42. The EBA Senior Legal Expert (Expert) continued by summarising the feedback received in the public consultation as well as the discussion at the respective task force level. He mentioned that as part of the feedback, stakeholders proposed several amendments to the text of the Guidelines related to conflict of interest (Col) including more criteria about breaches of Col rules and corrective measures, and internal reporting channels for persons who reported breaches of Col rules. He also focused on two main issues that were discussed during the last task force meeting: (i) one related to the calculation of the 14-year limitation in the term of office for members of the governance body, to ensure that the proposed text excluding the periods in office related to appointments that occurred before 11 January 2026 in line with the legislation; and (ii) changes to clarify that CA staff were not prevented from holding a minimal level of financial instruments in cooperative banks or similar institutions where this was necessary in order to have access to their banking services, with the proposed text considering those cases as not giving rise to Col or as not amounting to trading where the level of financial interest can be considered negligible and the investment or divestment operations of the financial instruments only take place between the staff members or with the institution itself. The Expert said that the proposals were discussed and accepted by the task force subject to final comments

and would be addressed in the final Guidelines which should be submitted to the MB in March by written procedure for fatal-flaw comments, followed by submission to the BoS in April 2026.

43. The Members did not raise any comments.
44. The EC representative informed that the EC would further analyse the proposal regarding the calculation of the 14-year time limitation for the tenure period.
45. The Chairperson concluded by noting the Members' support.

Agenda item 7: Peer review on Pillar 3 (for discussion)

46. The Head of LC informed the Members that the EBA has been finalising its analytical work on the peer review on Pillar 3 disclosures for which six CAs have been selected to be reviewed. The report was being finalised and the tabled note summarised preliminary results.
47. The EBA Legal Officer continued by noting that the Peer Review Committee (PRC) developed the Self-Assessment Questionnaire (SAQ) - including the setting of the criteria to fulfil the benchmarks defined over the summer 2025 and shared it with the selected CAs in September. The defined benchmarks were (1) Effective integration of all relevant Pillar 3 requirements CAs' supervisory manuals, guidelines, or similar; (2) Effectiveness of arrangements for supervising and reviewing institutions' Pillar 3 prudential disclosures, policies, internal processes and systems and controls; (3) Effective implementation of processes for the assessment of Pillar 3 disclosures and related formal policies, internal processes, systems and controls by institutions, and (4) Effectiveness of the supervision of compliance by institutions with Pillar 3 disclosure requirements. He summarised the preliminary findings of the peer review so far and said that they showed that four of the six CAs were prone to be rated "fully applied" or "largely applied" by the PRC for all four benchmarks. One CA would be very likely given lower ratings ("partially applied" or even "not applied") for all benchmarks as for this CA the follow-up on Pillar 3 requirements was not a priority did not normally qualify as a significant risk to financial stability and the functioning of the financial sector and therefore the CA did not regularly allocate resources to supervision of CIs disclosures. He added that the PRC would also draft a number of recommendations to the CAs based on the ratings. The Legal Officer concluded by listing next steps and saying that the PRC would consider any MB comments and share the draft report with the CAs for accuracy checking. The EBA would circulate a revised version to the MB for written comments in mid-March, with a view to it being tabled at for discussion at the April BoS and subsequent publication in May 2026.
48. While supporting the work, the Members raised concern related to the finding that one CAs was not compliant with Pillar 3 requirements. They questioned how the EBA was planning to discuss this finding with the respective CA. Several Members stressed that

one of the aims of peer reviews was to identify relevance of regulatory requirements and that in this particular case, the EBA should further analyse observed national practices. Another Member noted that recommendations resulting from peer reviews should be carefully drafted to address market situation and practices in order to be of an added value. Additionally, one Member commented on the peer review process itself, suggesting that the number of questions in the SAQ might need to be reconsidered by the EBA to avoid overlapping and repetitive questions. The Members also noted their intention to provide further comments on the report prepared by the PRC.

49. The EC representative questioned whether the observed practices indicated any supervisory concerns and whether the EBA should initiate policy and supervisory discussions related to disclosures.
50. The Vice-Chairperson commented on the level of detail typically identified in best practices during peer reviews.
51. The Legal Officer clarified that best practices served as examples of good approaches; the EBA did not expect CAs to implement these best practices. This was in contrast to recommendations identified by the PRC, which were intended both for individual CAs and, more broadly, for the regulatory community.
52. The Head of LC reflected on the discussion on supervisory convergence, noted that one CA had implemented a more risk-based approach in their reviews of Pillar 3 data which had reduced the extent of review without this leading to concerns about the overall level of supervisory convergence.
53. The Executive Director added that as mentioned under the supervisory convergence item, the EBA set out supervisory expectations at the beginning of the peer review process, collect relevant data, consider them against the expectations, revise, where needed and subsequently, provide guidance to its CAs.
54. The Vice-Chairperson concluded by noting the comments raised by the Members and said that the EBA would prepare an issue paper guiding discussion
55. **Agenda item 8: Enterprise Risk Management - Mitigation plans (for discussion)**
56. The Head of LC reminded the Members of the EBA Enterprise Risk Management (ERM) policy adopted in 2022 according to which the MB has been updated on developments on the risk management framework twice a year - in September when the EBA presented the risk assessment results relating to the work plan for the coming year, including an update of the strategic risks and in February/March, when the EBA tabled an interim report which focusing on how the strategic risks identified in September have been evaluated against the risk appetite statement, including additional risk mitigation measures put in place for specific shortlisted risks. He added that since the adoption of the updated strategic risk

register for 2026 in the September 2025 MB, the EBA has been focussing on identifying the additional mitigation measures for five out of the 15 strategic risks shortlisted.

57. The EBA Legal Officer updated the Members on the progress made on the previous year's additional mitigation measures. He said that for 2026, five risks that had been shortlisted in September 2025 were selected for additional mitigation measures. The respective Director(s) / Heads of Units in charge of these risks proposed mitigation measures beginning of 2026 for each of the risks, which were then reviewed by the Executive Director in February 2026. The five selected risks were: Risk 1: Risk of not fulfilling mandated obligations or tasks due to limited / unaligned resources; Risk 9: Inadequate knowledge management tools and procedures impact effectiveness and accountability; Risk 10: Inability to deliver strategic EBA tasks which are fit for purpose; Risk 13: Inability to recruit, develop and retain correct staff profiles, and Risk 15: Inability to prevent and remediate IT security breach and the Legal Officer briefly summarised the update made by the EBA on the measures for each of these risks. He concluded by clarifying that elements of some additional measures would be added to some risks in the future and they would be shared at the September 2026 MB meeting update.

58. The Members did not raise any comments.

59. The Vice-Chairperson concluded by noting the Members' support for the work.

Agenda item 9: Provisional Agenda of the BoS conference call on 18 March 2026 (for discussion)

60. The Vice-Chairperson informed that the EBA was planning an additional BoS conference call on 18 March 2026 to address ongoing discussions on the implementation of the TFE recommendations.

61. The Members did not raise any comments.

62. The EBA Vice-Chairperson concluded by noting the MB's support.

Agenda item 10: AOB

63. Firstly, the Executive Director informed that one CTPP filed an appeal before the Board of Appeal challenging its designation as a CTPP. The appeal was against all three ESAs as it was a joint decision and ESA staff were now preparing the response. The appellant has not requested suspension of the decision, so oversight work could continue while the appeal was heard.

64. Secondly, the Executive Director mentioned that the previous Chairperson informed the EBA about a potential occupational activity. As the post-employment activity would be in the service of the EU, the EC implementing rules on post-employment occupational

activities which were applied by the EBA did not require any formal notification of the EBA, so the EBA would not need to receive and approve notification of the appointment.

65. Thirdly, the Executive Director said that he was invited, together with the EBA Director of Operations Department, to a hearing with DG BUDG on the EBA Building project.
66. Finally, the Executive Director mentioned that the Internal Audit Services of the EC finalised and closed all their findings on the HR audit conducted in 2023.
67. The Vice-Chairperson thanked Ms Nathalie Aufauvre for her work and contributions during her MB mandate.

Participants at the Management Board conference call on 19 February 2026

Vice-Chairperson Helmut Ettl

Member Nathalie Aufauvre
Member Heather Gibson
Member Louise Mogensen
Member Kristine Cernaja-Mezmale
Member Giuseppe Siani

European Commission representative

Almoro Rubin De Cervin

EBA

Executive Director

Francois-Louis Michaud

Directors

Isabelle Vaillant
Meri Rimmanen
Marilyn Pikaro
Kamil Liberadzki

EBA Heads of Unit

Anne Tiedemann
Jonathan Overett Somnier

Experts

Tea Eger
Adrienne Coleton
Alex Herr
Oleg Shmejlov
Juan Manuel Rodriguez

For the Management Board,

Done at Paris on 24 April 2026

[signed]

Francois-Louis Michaud

EBA Chair