

SUPERVISORY CONVERGENCE

2025

EBA/REP/2025/16 June 2026

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Abbreviations

Abbreviation	Meaning
AI	Artificial intelligence
AML/CFT	Anti-money laundering/countering the financing of terrorism
AMLA	Anti-Money Laundering Authority
ART	Asset Referenced Token
AT1	Additional Tier 1
BRRD	Bank Recovery and Resolution Directive (Directive 2014/59/EU)
CA	Competent Authority
CASC	Crypto Assets Standing Committee
CASP	Crypto-asset service provider
CET1	Core equity tier 1
CMDI	Crisis management and deposit insurance framework
CMDI	Crisis management and deposit insurance framework
CRD	Capital Requirements Directive (Directive 2013/36/EU)
CRD6	Capital Requirements Directive (Directive (EU) 2024/1619)
CRR	Capital Requirements Regulation (Regulation (EU) No 575/2013)
CRR3	Third Capital Requirements Regulation (Regulation (EU) No 2024/1623)
CSD	Central securities depositories
DGS	Deposit guarantee scheme
DLT	Distributed Ledger Technology
DoD	Definition of default

DORA	Digital Operational Resilience Act (Regulation (EU) 2022/2554)
DRM	Dynamic risk modelling
EBA	European Banking Authority
ECB	European Central Bank
EIOPA	European Insurance and Occupational Pensions Authority
EMI	Electronic money institutions
EMT	E-money token
EREP	European Resolution Examination Programme
ESA	European Supervisory Authorities
ESEP	European Supervisory Examination Programme
ESMA	European Securities and Markets Authority
EVE	Economic value of equity
FoLTF	Failure or likely to fail
Founding Regulation	EBA Founding Regulation (Regulation (EU) No 1093/2010)
FRTB	Fundamental review of the trading book
FSB	Financial Stability Board
FX	Foreign exchange
GPAI	General Purpose AI
HQLA	High-quality liquid assets
ICAAP	Internal capital adequacy assessment process
ICT	Information and communication technology
ILAAP	Internal liquidity adequacy assessment process
IRRBB	Interest rate risk in the banking book
JC SC DOR	Joint Committee Subcommittee on DORA
KPI	Key performance indicator
LSI	Less significant institution
MA	Market authority

MBDT	Minimum bail-in data template
MiCA	Markets in Crypto-assets Regulation
MIS	Management information systems
ML/TF	Money laundering/terrorist financing
MREL	Minimum requirement for own funds and eligible liabilities
NII	Net interest income
NMD	Non-maturity deposit
NPE	Non-performing exposures
NPL	Non-performing loans
ORC	Overall recovery capacity
PSD2	Second Payment Services Directive (Directive (EU) 2015/2366)
QIS	Quantitative impact studies
RA	Resolution authority
Rol	Register of information
RTS	Regulatory technical standards
SDFA	Supervisory Digital Finance Academy
SGIT	SubGroup on ICT risk supervision
SOTs	Supervisory outlier tests
SRB	Single Resolution Board
SREP	Supervisory review and evaluation process
SSM	Single Supervisory Mechanism
T2	Tier 2
TLAC	Total loss absorbing capacity
TREA	Total risk exposure amount
TV	Trading venue
USSPs	Union-wide strategic supervisory priorities
VDR	Virtual data room

Executive Summary

A key way that the EBA contributes to simple, consistent, transparent and fair regulation is through its focus on supervisory convergence, reflecting its objective in Article 1(5) of its Founding Regulation to enhance supervisory convergence across the internal market.

That objective is supported by specific convergence tasks given to the EBA, including promoting convergence in relation to new and existing financial activities (Article 9(2) of the Founding Regulation), supervisory processes in anti-money laundering/countering the financing of terrorism (AML/CFT) supervision (Article 9a(4)), the supervisory review and evaluation process under the CRD (Article 20a), a common supervisory culture and practices (Article 29(1)), technological innovation (Article 31(3)), together with assessing the degree of convergence in supervisory practices and enforcement (Article 30). Through this work the EBA supports consistent and strengthened supervisory outcomes across all dimensions of its activities: prudential, resolution, consumer protection, digital finance and (until the end of 2025) AML/CFT.

Supervisory convergence helps prevent financial institutions from exploiting perceived or real differences in regulatory and supervisory frameworks across different jurisdictions. It promotes a unified supervisory culture and strengthens the EU's financial system through several mechanisms, including:

- ensuring all financial institutions meet the same standards, building trust among consumers and investors and reducing systemic risks;
- facilitating the ability to establish institutions, branches and provide services across the Union, giving effect to the internal market;
- contributing to a consistent level of protection for consumers across the EU, regardless of where responsibility for supervision lies.

The EBA is required to publish a report each year on the degree of convergence of the supervisory review processes pursuant to Article 107(2) of the CRD. The report focuses on the implementation of the EBA's 2025 ESEP in three core areas: first, resilience testing amid macroeconomic uncertainties, where supervisors evaluated banks' capital and liquidity planning but encountered challenges in forward-looking scenario integration and data limitations; second, digital operational resilience, where advancements were made in ICT risk management and DORA compliance, though gaps remained in third-party risk governance and automation of controls; and third, transitioning to Basel III/CRR3, where institutions demonstrated preparatory progress but faced hurdles in data quality and interpretation of new regulatory requirements. The 2025 SREP revealed stable overall scores but identified divergences in P2R, particularly for concentration and interest rate risks, while P2G methodologies showed improving alignment yet remained uneven across jurisdictions.

Beyond these findings, in resolution, the EBA observed overall progress in operationalising bail-in tools and liquidity strategies and MIS for valuation. For MIS, resolution authorities continue to report key

challenges related to automation and the operational ability to deliver valuation data within short timelines, documentation completeness, governance and data-quality assurance. For liquidity, key challenges persist in MIS capabilities, operationalisation and mobilisation of collateral - especially non-central-bank-eligible and non-marketable assets - and in ensuring sufficiently severe and resolution-specific assumptions in the scenarios. In terms of operationalization of resolution tools, testing is becoming more embedded in RAs' practices, with increasing use of simulations exercises to assess operational readiness.

Meanwhile, in digital finance, progress was made in MiCA supervision, including the development of common risk assessment frameworks for asset-referenced tokens and e-money tokens, while flagging persistent liquidity mismatches and AML/CFT vulnerabilities, alongside DORA's implementation challenges, particularly in data quality and cross-border ICT dependencies.

On the consumer protection front, initiatives included the launch of a payment fraud dataset covering 6,000+ providers to enhance transparency, alongside broader efforts to combat social engineering scams and unauthorised transactions.

With respect to AML/CFT, the EBA oversaw active supervisory colleges noting improved cross-border cooperation but persistent gaps in risk-based resource allocation and strategic coordination, while MiCA's implementation exposed risks such as forum shopping and opaque organisational structures, necessitating stricter licensing checks and enhanced information-sharing.

Turning to environmental, social and governance risks, the EBA conducted trainings and workshops and identified data gaps and methodological inconsistencies in integrating ESG factors into supervisory assessments.

Cross-cutting activities such as peer reviews and Q&As, will help looking ahead to 2026. The EBA will prioritise deeper Basel III/CRR3 convergence, comprehensive resolution testing and enhanced MiCA supervision, while continuing to promote legislative reforms and cross-border collaboration to reinforce the EU's financial stability and ensure a level playing field across Member States.

1. Prudential supervision

1. The EBA continued to strengthen supervisory convergence through its 2025 European Supervisory Examination Programme, with supervisory attention centred on three key topics: testing and adjusting to increasing economic and financial uncertainties, digital challenges, and transitioning towards Basel III and the EU banking package implementation. Monitoring of competent authorities' work showed that these key topics were broadly embedded into supervisory programmes, while also revealing recurring implementation challenges as outlined in the paragraphs below.
2. Regarding testing and adjusting to increasing economic and financial uncertainties, supervisors assessed banks' resilience under heightened macro-financial and geopolitical uncertainty, including the adequacy of capital and liquidity planning, the severity and governance of stress-testing frameworks and the credibility of recovery options. Key challenges included data limitations, uneven scenario severity and insufficient integration of forward-looking results into decision-making.
3. Regarding digital challenges, supervisory work focused on ICT and cyber risk management, operational resilience and third-party dependencies, including progress towards DORA implementation. Persistent hurdles included governance and expertise gaps, uneven maturity of controls and resilience testing, and data-quality issues in outsourcing inventories and incident reporting.
4. Regarding transitioning towards Basel III and the EU banking package implementation, supervisors reviewed institutions' readiness for the revised prudential framework (including capital planning, data aggregation and reporting capabilities, and implementation of revised credit and operational risk requirements). Main challenges related to interpretation and operationalisation of new requirements, data quality and system constraints, and ensuring a consistent implementation across institutions.
5. Overall, the 2025 ESEP underlines the need for sustained supervisory attention to (i) resilience in an uncertain macro-financial environment, (ii) digital operational resilience and ICT risk management, and (iii) a timely and consistent transition to the Basel III / EU banking package framework, to support a level playing field and safeguard financial stability.

1.1. Monitoring the implementation of the European Supervisory Examination Programme (ESEP) in 2025

1.1.1. Background

6. The EBA is mandated by its Founding Regulation¹ to contribute to enhancing supervisory convergence across the internal market and to help establish a common supervisory culture and consistent supervisory practices across the EU, including through the development of Union wide strategic supervisory priorities (USSPs). The CRD² also foresees a role for the EBA in assessing the functioning of the supervisory review and evaluation process (SREP), including by reporting annually to the European Parliament and the Council on the degree of convergence of supervisory practices.
7. To fulfil these mandates, the EBA makes use of a range of convergence tools, including the annual identification of priorities and key topics for the attention of prudential supervisors. Until 2025, these priorities were published on a standalone basis as the ESEP. As of 2026, they will be integrated into the EBA Annual Work Programme. The priorities and key topics refine the USSPs into more concrete supervisory activities and actions that the EBA expects CAs to consider when setting up their supervisory work programmes.
8. The ESEP for 2025 was published in July 2024, followed by a questionnaire addressed to CAs at the end of 2025 to assess the implementation of the identified priorities. The questionnaire, which was answered by 26 CAs, covered nine qualitative questions, including whether each key topic had been incorporated into supervisory priorities, the supervisory actions and tools used and the application of proportionality, as well as the main challenges, best practices and areas where further follow-up would be needed in subsequent supervisory cycles.
9. In parallel, the EBA followed up on the implementation of the 2025 priorities through its monitoring of supervisory colleges, taking into account discussions within colleges, interactions with supervised institutions and the risk assessments carried out as part of college activities.
10. For 2025, the EBA identified three key topics for supervisors' attention (Figure 1). These topics were selected based on the EBA's analysis of risks in the EU banking sector, its policy work aimed at further enhancing supervisory convergence - particularly in the context of the SREP - and the practical experience of CAs. Accordingly, the three key topics sought to address the most material and evolving risks to EU banks' resilience in 2025, namely the impact of persistent geopolitical and macro-financial uncertainty on asset quality and funding conditions, the growing vulnerability to ICT and cyber risks in the context of accelerating digitalisation and the application of the DORA

¹ 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, pp. 12–47, ELI: <http://data.europa.eu/eli/reg/2010/1093/oj>).

² 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 and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC (OJ L 176, 27.6.2013, pp. 338–436, ELI: <http://data.europa.eu/eli/dir/2013/36/oj>).

framework, and the need to ensure a robust and consistent implementation of the Basel III and EU banking package, which introduces significant changes to prudential requirements.



Figure 1: Key topics included in the ESEP for 2025

1.1.2. Overview of results

11. All the key topics have been fully or at least partially embedded into the supervisory priorities of most CAs for 2025 (Figure 2). All CAs reported having considered key topic 1 in their own priorities, either fully (89%) or partially (11%), with the latter justified by a lack of explicit prioritization even though the topic was still assessed as part of normal supervisory activities. The large majority of CAs (96%) has considered key topic 2 explicitly in their own priorities, while only 4% have considered only partially. With regard to key topic 3, 81% of CAs have fully incorporated it into their own priorities, with the remaining 19% doing so only partially. Partial incorporation for this key topic mainly reflects timing or resource constraints, with some authorities planning the assessment of certain elements only in 2026 (e.g. the development of data aggregation capabilities to support the implementation of the new requirements on credit or operational risk). Other authorities note that the assessment of the impact of regulatory changes is already embedded in day-to-day supervisory work.

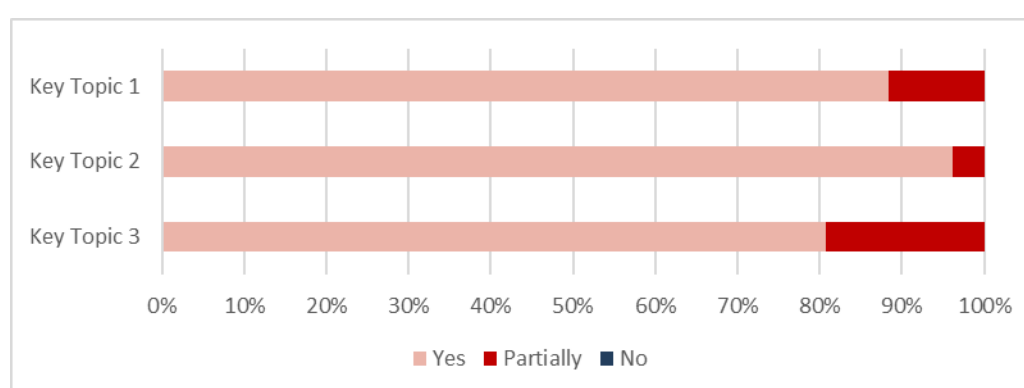


Figure 2: Key topics incorporated into CAs' supervisory priorities in 2025 (% of CAs)

1.1.3. Questionnaire results per key topic

1.1.3.1 Testing and adjusting to increasing economic and financial uncertainties

12. Most CAs have applied proportionality to assess this key topic based on institution size, complexity, risk profile and SREP categorisation. High-risk, high-impact or “focus” institutions receive the most intensive supervision, while smaller or less complex institutions are subject to lighter supervision, with less frequent SREP cycles, simplified reporting and qualitative assessments. Proportionality is also reflected in the frequency, depth and scope of supervisory engagement, stress-testing, recovery planning and scenario analyses, ensuring resources focus on the most significant risks. Some CAs do not apply proportionality and apply uniform approaches for all institutions.
13. Several good practices applied by institutions were identified by CAs in the context of their supervisory work under this key topic. These include regular updates of stress testing frameworks to reflect evolving risks, particularly geopolitical and macroeconomic developments, as well as the use of reverse stress testing and forward-looking scenarios. Institutions also demonstrated prudent risk management practices, such as enhanced monitoring of vulnerable exposures, proactive provisioning measures and the integration of emerging risks into capital and liquidity planning. In addition, good practices were observed by CAs in recovery planning, including strong involvement of management bodies, regular testing of recovery options and the use of well-calibrated indicators. Some institutions also showed conservative approaches to credit risk and liquidity management, including the use of overlays and stress assumptions, as well as frequent reassessment of exposures and strategic plans in response to changing economic conditions.
14. When asked about the main conclusions of their assessment on this key topic, CAs highlighted that stress testing frameworks and ICAAP/ILAAP processes have strengthened over time and are generally well embedded within institutions’ governance and capital planning, which increasingly consider geopolitical risks, macroeconomic shocks, and emerging risks. Overall, the banking sector has demonstrated resilience with adequate capital and liquidity positions, supported by regular supervisory assessments and scenario analyses.
15. Main challenges identified by CAs include insufficient forward-looking approaches and reliance on not sufficiently severe or overly optimistic scenarios, as well as limitations in modelling capabilities and data availability, particularly for emerging risks. In addition, stress testing is not always effectively integrated into decision-making and governance frameworks, and weaknesses remain in recovery planning, scenario design and risk identification, especially for smaller or less sophisticated institutions. Challenges in the design and use of stress-testing frameworks and recovery planning have also been identified in previous monitoring exercises and are therefore not specific to the 2025 risk environment, pointing to issues of a more structural nature.
16. Notwithstanding these challenges, CAs also noted that recovery planning has been further strengthened, with increased focus on incorporating severe and forward-looking scenarios, including geopolitical risks, cyber incidents, and market-wide disruptions, as well as greater use of reverse stress testing and feasibility testing of recovery options. Supervisory activities also highlighted the importance of ongoing monitoring of credit risk developments, particularly in vulnerable sectors and under changing macro-financial conditions.

17. For the assessment of this key topic, CAs relied mostly on off-site analysis, desk-based reviews and on-site inspections, followed by thematic and horizontal reviews and interviews (Figure 3).
18. CAs also highlighted several good practices in the assessment of this key topic, which include thematic reviews and targeted discussions with institutions' top management to raise awareness of emerging risks. It was also noted a proactive engagement with banks to assess capital planning, stress testing and risk management practices. Some CAs also emphasised the cross-functional supervisory cooperation between teams, as well as the use of international guidance and supervisory standards, such as the EBA guidelines on scenario analysis and ESG risk management³, ECB reports on climate stress testing and BIS principles on climate-related financial risks.

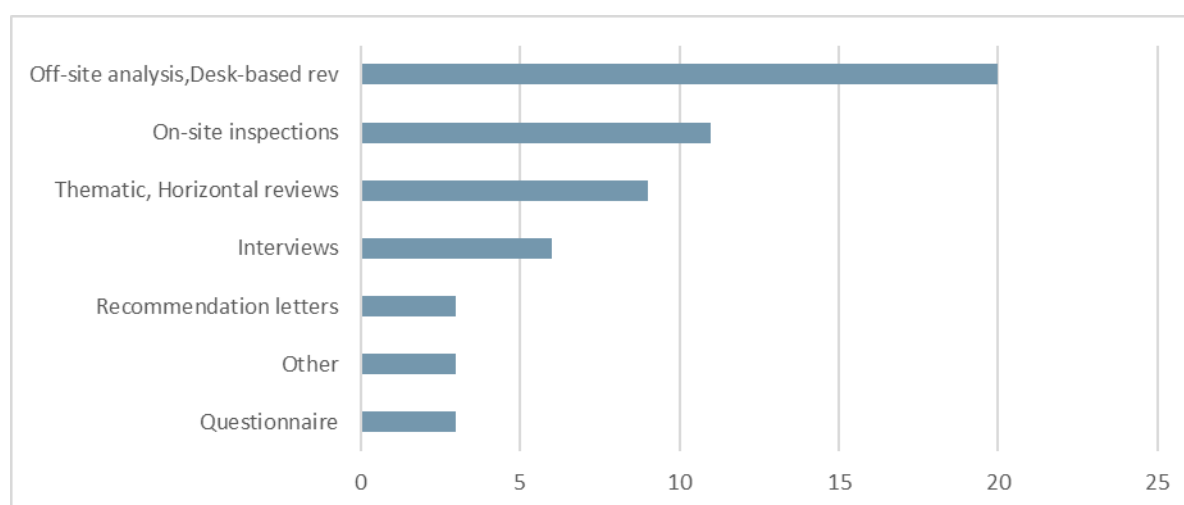


Figure 3: Supervisory actions/tools used to assess the key topics/attention points (number of CAs)

19. Regarding new aspects emerging during the year and not covered in the ESEP for 2025, CAs mainly referred to heightened geopolitical and macro-financial uncertainty, including escalating trade tensions, ongoing conflicts and increased market volatility. Some CAs also highlighted sanctions-related risks and sovereign developments. In terms of areas requiring follow-up beyond business-as-usual for future supervisory cycles, CAs highlighted the need for continued and enhanced monitoring of geopolitical risks and their transmission channels across risk categories. This includes further work on stress testing (notably geopolitical and macroprudential scenarios), recovery planning practices and the robustness of banks' internal frameworks such as ICAAP, ILAAP and IFRS 9 models. Supervisory attention is also expected to focus on specific risk areas such as exposures to high-risk countries, commercial real estate, private credit interlinkages, and ESG-related credit risks. In addition, several authorities underlined the importance of deepening horizontal and data-driven supervisory approaches, as well as following up on regulatory compliance in areas such as loan origination and mortgage bank frameworks. Overall, CAs emphasised the need to strengthen forward-looking risk identification in response to the uncertain environment.

1.1.3.2 Digital challenges

³ [Guidelines on environmental scenario analysis.pdf](#)

20. Most CAs applied proportionality to assess this key topic based on SREP categorisation, institution size, systemic importance, complexity and risk profile. Higher-impact or systemically relevant institutions were subject to more intensive supervisory engagement, including more frequent SREP assessments, deeper ICT, digital operational resilience reviews and broader supervisory interactions. Smaller or non-complex institutions were supervised through lighter approaches, such as longer supervisory cycles, simplified or adapted questionnaires, self-assessments and more focused reviews of key aspects (e.g. governance, outsourcing, incident management). Proportionality was also reflected in the frequency, depth and scope of supervisory activities, including the planning of supervisory engagements, ICT risk assessments, thematic reviews, and targeted deep dives when specific risks were identified. In some areas, uniform supervisory requirements apply regardless of institution size (e.g. certain DORA reporting obligations or ICT incident classification) and a few CAs reported limited or no application of proportionality in their supervisory activities.
21. In terms of good practices applied by institutions under this key topic, several CAs noted strengthened ICT and cyber risk management through structured incident classification, DORA-aligned frameworks and cybersecurity measures with board-level oversight and staff training. CAs highlighted that governance and oversight have improved with ICT expertise at board and internal control levels. Several CAs also noted the enhancement of third party and outsourcing risk management via centralised mapping of critical dependencies, monitoring tools and external audits. Regarding operational resilience and testing, CAs noted regular threat-led penetration tests (TLPT), disaster recovery and vulnerability assessments. With regards to emerging technologies, it was noted a stronger alignment between the IT strategy and the overall bank strategy.
22. When asked about the key outcomes of their assessment of institutions' plans and actions to ensure the effective and prudent management of ICT risk, CAs highlighted that most institutions have established basic ICT risk management frameworks, with notable progress in governance, documentation, and alignment with DORA requirements. However, the level of maturity remains uneven, and full integration into broader risk management and business strategies is still ongoing.
23. Main challenges identified include fragmented or insufficiently centralised governance frameworks, limited involvement and expertise at management body level in some cases, and gaps in documentation, roles, and responsibilities. In addition, CAs noted that, particularly smaller institutions face difficulties with proportionality, resource allocation and ensuring independence of control functions, while third-party risk integration and data quality issues continue to weaken the overall effectiveness of ICT risk management frameworks.
24. CAs also noted that third-party risk management remains the most challenging area, particularly in relation to the quality and completeness of Registers of Information and the alignment of contractual arrangements, with data quality emerging as a key concern. Operational resilience testing, including TLPT, is still at an early stage in several jurisdictions, with frameworks and preparedness not yet fully developed. In addition, CAs highlighted uneven progress in digitalisation across institutions, with more advanced entities showing better alignment between ICT risk management and transformation strategies. Broader challenges include difficulties in

understanding regulatory requirements, heterogeneity in DORA implementation, and the need to further strengthen incident response capabilities, governance practices, and the integration of resilience objectives into ICT risk frameworks. Overall, while progress is ongoing, implementation remains uneven and requires continued supervisory follow-up.

25. The tools mostly used by CAs to assess this key topic included off-site analysis, desk-based reviews and questionnaires, followed by on-site inspections and thematic and horizontal reviews (Figure 4).
26. As a good practice, CAs combined standardised self-assessment questionnaires and structured reporting frameworks with risk-based supervisory methodologies, including ICT-SREP assessments, thematic analyses, and targeted follow-ups, to monitor institutions' preparedness for DORA. These approaches were complemented by supervisory dialogue with institutions and industry stakeholders, the use of incident reporting systems and dashboards to track ICT risks and trends, and the integration of advanced analytical tools to support the review of large volumes of information, enabling more consistent, data-driven, and proportionate supervision of ICT and operational resilience risks.

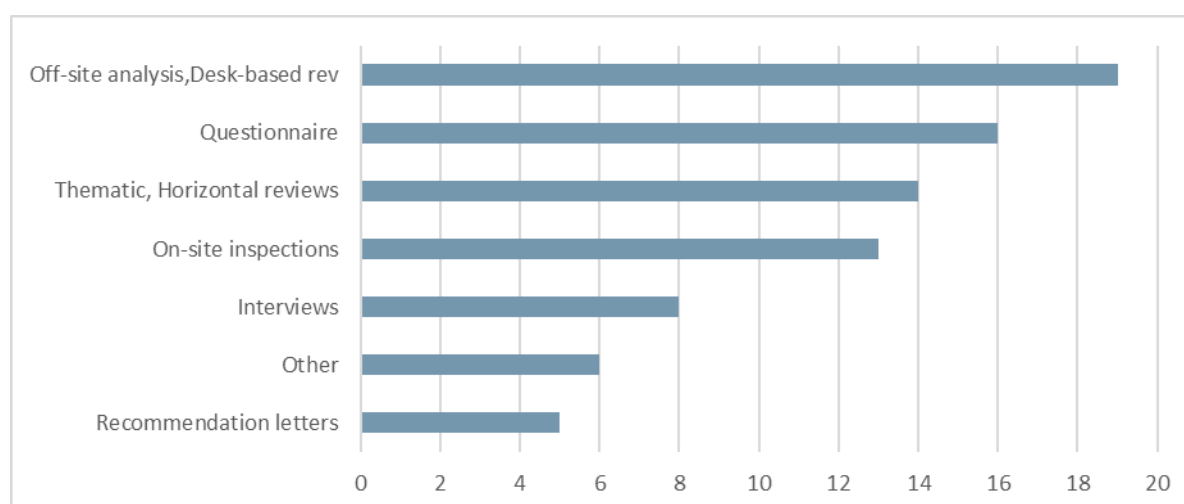


Figure 4: Supervisory actions/tools used to assess the key topics/attention points (number of CAs)

27. Regarding new aspects emerging throughout 2025, CAs noted increasing supervisory focus on evolving regulatory requirements, challenges in incident classification and data integrity and growing attention to systemic risks such as cross-border ICT dependencies and cloud concentration. In addition, more advanced resilience testing expectations and emerging risks related to AI and model governance were identified by CAs, as well as, gaps in ICT expertise and the need for organisational adaptation. In terms of areas requiring follow-up beyond business-as-usual in future supervisory cycles, CAs highlighted the need to ensure full DORA compliance, with a strong focus on third-party risk, data quality, ICT governance, and operational resilience. Further attention was also pointed to digital innovation (including AI and tokenisation).

1.1.4. Transition towards Basel III and the EU Banking Package Implementation

28. Most CAs applied proportionality in defining the scope and depth of their supervisory work under this key topic. Proportionality has been applied based on size, complexity or risk profile of the institution, with some authorities referring to the institutions' SREP categorisation, or the use of further segmentation among LSIs or SNCIs. More detailed assessments were carried out for institutions with material expected impacts from CRR3⁴ reforms (e.g. IRB institutions, banks with higher exposures to operational risk) or for more demanding or complex areas such as the implementation of the output floor. Several CAs integrated proportionality directly into their multiyear supervisory planning frameworks, using targeted reviews, deep dives, or more intensive engagements for a subset of institutions. A smaller group reported that supervisory activities encompassed all institutions, though most noted that the depth and intensity of the supervisory engagement was dependent on proportionality considerations (size, complexity, risk profile).
29. CAs identified a number of good practices applied by institutions that supported a smoother transition to the revised Basel III framework. These included early preparatory work, with institutions performing impact assessments as soon as draft regulatory texts or assumptions became available, early and continuous engagement with supervisors, particularly in areas requiring permissions or derogations under the revised framework, and transparent communication, including voluntary disclosure to supervisors or the public of expected capital impacts, in some cases broken down by individual components. Also mentioned were enhanced governance arrangements, such as establishing dedicated committees or management forums to steer, prioritise and coordinate the implementation across business areas and ensure clear accountability, the development of mitigation strategies ahead of the implementation of new credit conversion factors (CCF). Examples could be found in review of revolving/non-revolving product mix, risk-based reduction of granted limits, or of the revised operational risk framework, the use of shared IT infrastructures facilitating the timely adaptation of banking systems to the new requirements, and materiality assessments for climate-related and environmental risks, enabling institutions to identify the most material exposures and determine areas requiring deeper analysis or enhanced risk management.
30. When asked about the main conclusions of their assessment of institutions' ability to adapt to the revised regulatory framework, CAs highlighted several recurring challenges: data quality issues, including inconsistencies between internal and regulatory reporting or incomplete application of new templates, complexity in applying certain CRR3 elements, such as the preferential treatment of real estate exposures, standardised approach classifications, operational risk components and transitional arrangements, as well as variability in institutions' understanding of the output floor and IT constraints, including limited automation or heterogeneous legacy systems, particularly for smaller institutions. Despite these challenges, most authorities concluded that institutions are generally progressing well, with only isolated cases of poor implementation requiring closer supervisory follow-up.

⁴ Regulation (EU) 2024/1623 of the European Parliament and of the Council of 31 May 2024 amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor (OJ L, 2024/1623, 19.6.2024, ELI: <http://data.europa.eu/eli/reg/2024/1623/oj>).

31. A few CAs also noted the need for increased clarity and consistency in ESG reporting amid ongoing EU legislative developments, as well as, the importance of continued supervisory training and refinement of benchmarking exercises. CAs also observed that smaller institutions may require continued support or simplified processes.
32. CAs used a range of supervisory tools to assess institutions' ability to comply with the new regulatory requirements. Off-site analysis and desk-based reviews were most frequently cited, followed by thematic and horizontal reviews and, on-site inspections (Figure 5).
33. In terms of good practices applied by authorities in the assessment of this key topic, CAs mentioned systematic reviews of data quality, particularly for new or recalibrated COREP templates, early communication of supervisory expectations, such as through webinars, circulars or dedicated workshops, use of horizontal benchmarking, followed by targeted deep dives on institutions most affected by the reforms, pilot exercises or clustering approaches to enhance consistency, and participation in EU wide supervisory coordination efforts to ensure alignment of assessments.



Figure 5: Supervisory actions/tools used to assess the key topics/attention points (number of CAs)

34. While some CAs did not identify new issues requiring supervisory attention, others highlighted emerging challenges. These included aspects related to the implementation of the new operational risk framework, in particular the use of the Prudential Boundary Approach for calculating the financial component of the Business Indicator. CAs also referred to the need for a gradual supervisory approach to transition planning and to the application of the EBA Guidelines on the management of ESG risks, with an initial focus on informal supervisory dialogues in 2025-2026 and a more formal assessment phase from 2027 onwards. Further issues mentioned concerned the impact of CRR3 on institutions' total risk exposure amount (TREA), which in some cases resulted in a more binding leverage ratio or facilitated additional dividend payouts, as well as operational readiness for the implementation of the output floor.
35. CAs also highlighted a number of areas requiring continued supervisory attention in future supervisory cycles. These included the correct and consistent application of the revised standardised approach for credit risk, notably for exposures secured by mortgages on immovable

property (including Assets underlying Derivative Contracts exposures), the treatment of unrated corporates, and the assessment of fully loaded capital requirements as transitional provisions are phased out. Follow-up was also considered necessary in relation to operational risk, including targeted reviews of the calculation of own funds requirements under the new framework, data quality, and institutions' understanding of the revised regulation and methodologies.

36. CAs also identified ESG risks as a key area for follow-up. While progress has been made in governance and risk identification, further supervisory focus is needed on risk quantification and the integration of climate and environmental risks into stress testing frameworks and ICAAPs. Responses highlighted challenges in capturing all material risk drivers, portfolios and transmission channels, suggesting that risks may be underestimated. Lastly, the need to monitor the data architecture and IT infrastructure developed supporting risk data aggregation and risk reporting was also mentioned.

1.1.5. Findings from monitored supervisory colleges

37. Overall, the findings from the monitoring of supervisory colleges are broadly consistent with the results of the questionnaire addressed to CAs, confirming that the key topics were effectively embedded into supervisory work programmes and translated into concrete supervisory activities. Across the colleges monitored, the three key topics were primarily addressed through ongoing risk assessments, SREP related work (e.g. offsite analysis, targeted reviews and on-site inspections), and follow-up on supervisory findings, with proportionality applied depending on institutions' risk profiles, size and complexity.
38. For key topic 1, college monitoring shows a strong focus on stress testing, capital and liquidity planning, and recovery planning, with supervisors assessing how geopolitical and macro financial risks are reflected in ICAAP/ILAAP, stress scenarios and risk appetite frameworks. While several institutions demonstrated mature practices, including the use of severe and reverse stress testing and regular updates of risk frameworks, supervisors also identified areas requiring continued follow-up, notably in relation to the calibration of scenarios, the forward-looking integration of emerging risks and the governance and escalation of stress testing outcomes.
39. For key topic 2, the monitoring highlights that supervisory attention at college level concentrated on ICT and cyber risk management, operational resilience and third-party risk, often in connection with the implementation of the DORA framework. Colleges discussed the results of on-site inspections, thematic reviews and gap analyses, with supervisors identifying progress in governance arrangements and incident reporting, but also recurring weaknesses related to control effectiveness, data quality, outsourcing arrangements and the maturity of operational resilience testing. In several cases, follow-up actions were planned or ongoing to address identified deficiencies.
40. Finally, for key topic 3, college discussions focused on institutions' preparedness for the revised prudential framework, including capital planning, data quality and the implementation of revised credit and operational risk requirements. Supervisors assessed the impact of CRR3 reforms through impact analyses, reviews of capital plans and follow-up on earlier findings, noting

generally adequate progress but also persistent challenges, particularly regarding data aggregation and reporting capabilities, the application of new methodologies and the consistency of implementation across risk areas.

1.2. Convergence of supervisory practices in the context of Pillar 2

41. Progress has been observed compared to the previous exercise in achieving a more harmonised identification and treatment of risks covered by Pillar 2 Requirements (P2R) across the EU, as well as, greater consistency in the methodologies used to set Pillar 2 Guidance (P2G).
42. Scope for further convergence in the setting of P2R across the EU persists. While part of the observed dispersion may be justified by differences in the risk profiles of the institutions concerned, some variation may also reflect divergent supervisory approaches across competent authorities.
43. Several authorities have already taken into account the interaction between Pillar 1 Requirements (P1R) and P2R in light of the revised regulatory framework under CRR 3 and CRD 6 during the 2025 SREP cycle. This has, in some cases, led to methodological adjustments and recalibration of P2R.
44. Given the importance of maintaining the complementarity between P1R and P2R, the EBA will continue to monitor the consistency of approaches across the EU regarding this interaction, as well as, the overall consistency of P2R methodologies. This will form part of its ongoing ex-post implementation work, also in view of the forthcoming application of the revised EBA SREP Guidelines.

1.2.1. Background

45. The analysis of the approaches adopted by CAs in conducting their SREP, commonly referred to as 'Pillar 2', constitutes a central component of the EBA's efforts to promote supervisory convergence, in line with its mandate in this area. Beyond enabling the EBA to assess the consistency of supervisory reviews, evaluations and measures in accordance with the Article 107 of CRD, the outcomes of this analysis also provide a valuable feedback loop for the EBA's policy work. From a practical perspective, they help identify areas within the EBA SREP Guidelines where further clarification or potential revisions may be warranted, reflecting evolving supervisory practices, as well as areas where the implementation of the Guidelines may merit ad hoc focus as part of the EBA's supervisory convergence activities.
46. Consistent with similar exercises carried out in 2019, 2021 and 2023⁵, this analysis focuses on key supervisory areas, including the setting of P2R and P2G, as well as Pillar 2 Requirements and Pillar 2 Guidance for the leverage ratio (P2R-LR and P2G-LR, respectively).

⁵ See the [EBA Report on convergence of supervisory practices in 2023](#), [EBA Report on convergence of supervisory practices in 2021](#) and the [EBA Report on Convergence of supervisory practices in 2019](#) for further details.

47. In light of the significant revision of the Level 1 regulatory framework in this area through the CRR3/CRD6⁶ banking package, the exercise also specifically aims to assess whether, and if so how, the new requirements have already been reflected in supervisory approaches under the Pillar 2 framework in 2025 or are expected to be reflected in upcoming supervisory cycles.
48. To support the analysis, the EBA launched a data collection exercise to gather information⁷ from CAs, the results of which are presented in this report. The exercise collected detailed institution-level information covering both quantitative and qualitative aspects. This included information on business models, SREP categories, overall and risk-specific SREP scores, the risk-by-risk decomposition of P2R, P2R-LR, and the levels of P2G and P2G-LR, together with the methodologies used to set them. A dedicated section also examined how CAs have addressed, or intend to address, the new elements introduced by the revised CRR3/CRD6 regulatory framework, such as the output floor.
49. As illustrated in the following section, and in line with observations from previous exercises, coverage in terms of assets is comprehensive and supports the drawing of general conclusions at EU level for large institutions, notably due to the significant share of total assets represented by Significant Institutions (SIs) directly supervised by the ECB. By contrast, for Less Significant Institutions (LSIs) supervised by national CAs, the relatively small sample size - particularly in some jurisdictions - compared with the overall population of LSIs may limit the ability to draw general conclusions or to fully reflect supervisory practices across CAs.

1.2.2. Data analysed

50. The sample utilised in the data collection comprises 286 banks under the direct supervision of 28 competent authorities (27 NCAs and ECB), representing 79% of the European banking sector's assets. CAs were requested to provide data for institutions falling within their jurisdiction based on the following criteria:
- a. Up to five 'Large institutions' – significant institution established in a Member State;
 - b. Up to ten between 'Medium' – total value of consolidated assets between EUR 5 and 30 billion – and 'Small' institutions⁸ – 'small and non-complex institutions' under CRR II – established in a Member State.
51. As a result, the sample is composed of 99 'Large' institutions, 78 'Medium' institutions and 109 'Small' institutions. In terms of SREP categorization, the sample is mostly composed of Category 1 institutions (47%), with a good proportion and representation of banks with a lower categorisation (respectively 19% belonging to Category 2 and 34% to categories 3 and 4).

⁶ 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, ELI: <http://data.europa.eu/eli/dir/2024/1619/oj>).

⁷ The 2025 exercise collected data for end 2024. Based on the specific SREP calendar followed by CAs, data could reflect different SREP cycles.

⁸ While the coverage in terms of assets is exhaustive and could allow for general conclusions especially for large institutions, the elevated number of LSIs within some jurisdictions means that selecting a few institutions for this category may not fully represent the entirety of the CAs' practices.

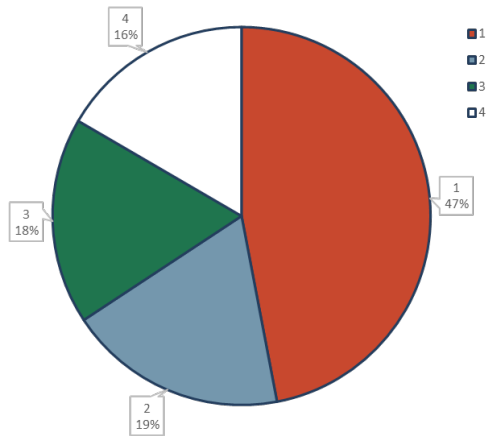


Figure 6: Distribution of SREP Categorisation

52. In terms of business model, the majority of the banks are classified as local universal. All business models are represented in the sample, with at least one bank falling into each category.

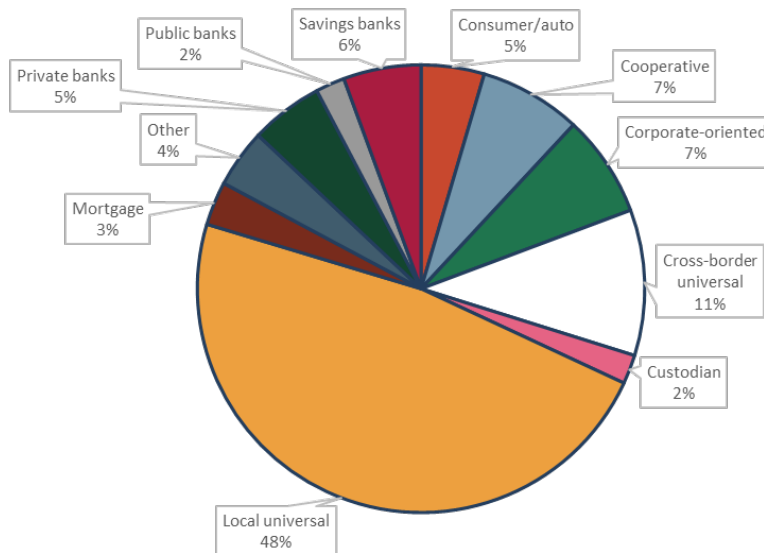


Figure 7: Distribution per Business Model Categories

1.2.3. Overall SREP scores

53. Considering the relevance of the SREP scores as a summary indicator of the overall risk to the institution's viability according to the SREP assessment, a focused explorative analysis has been conducted on the assignment of these scores.

54. In terms of the distribution of the overall SREP scores⁹, the next figure illustrates that most of the institutions in the sample have been assigned 'intermediate' scores of '2' and '3' (increased from the previous submission, from 92% to 98%). Score '4' was assigned to approximately the 2% of

⁹ While it is acknowledged that intermediate and more granular scores, for instance via the so-called qualifiers (+ or – or +/- 0.5) with respect to the general ones listed in the EBA SREP Guidelines are employed by some CAs, in order to ensure the consistent treatment of the banks across jurisdictions, SREP scores in the survey were asked as integer numbers from 1 to 4.

the sample (2% vs 8% in the previous submission), while the least risky score ('1') was assigned to only one bank, equivalent to the 0.4% of the overall sample, similar to the previous exercise). Notably, no institution in the sample was categorised as 'failing or likely to fail', hence no SREP score of 'F' was recorded.

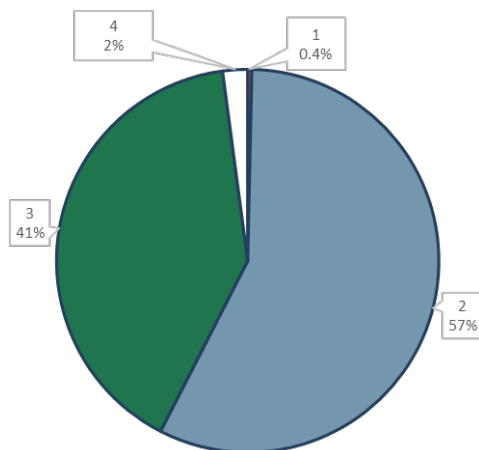


Figure 8: Distribution of the overall SREP score

55. To analyse the evolution of the overall SREP scores over time, a comparative analysis has been conducted between the distribution of scores from the previous assessment (published in the EBA Report on convergence of supervisory practices in 2023 with data from the end of 2022) and the current exercise. Only institutions included in both samples were considered. The majority of institutions present in both samples maintained their score, accounting for around 82%. Additionally, 13% improved their score, while 5% experienced a decline in their scores. Overall, the scores continue to exhibit high stability within each grade over time. Next figure provides a detailed breakdown of the transition across the scores observed between the two samples.

2023 submission	2025 submission			
	1	2	3	4
1	100%	0%	0%	0%
2	0%	85%	13%	0%
3	0%	13%	76%	0%
4	0%	2%	11%	100%
Total	100%	100%	100%	100%

Figure 9: Evolution of SREP scores over time

56. The stability of the scores and the predominant assignment of intermediate scores ‘2’ and ‘3’ have been observed not only over time but also across jurisdictions. When evaluating the dispersion of the SREP scores within and across CAs, the data confirms the previously highlighted general evidence, demonstrating an overall common trend across CAs. However, as previously mentioned, some CAs introduced greater scoring granularity aimed at improving score dynamics, which may not have been fully captured in the analysis due to the consistency issues already noted.

SREP Score	CA 01	CA 02	CA 03	CA 04	CA 05	CA 06	CA 07	CA 08	CA 09	CA 10	CA 11	CA 12	CA 13	CA 14	CA 15	CA 16	CA 17	CA 18	CA 19	CA 20	CA 21	CA 22	CA 23	CA 24	CA 25	CA 26	CA 27	CA 28	Total
1	0%	0%	0%	0%	0%	0%	0%	17%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	58%	92%	70%	73%	13%	25%	55%	83%	0%	20%	50%	57%	33%	50%	71%	43%	29%	67%	60%	90%	93%	70%	40%	0%	75%	0%	80%	0%	57%
3	42%	8%	30%	27%	88%	75%	45%	0%	25%	80%	50%	43%	67%	50%	29%	57%	71%	33%	40%	10%	7%	30%	60%	80%	25%	100%	7%	100%	41%
4	0%	0%	0%	0%	0%	0%	0%	0%	75%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	20%	0%	0%	13%	0%	2%

Figure 10: SREP scores dispersion

57. Shifting the focus to the analysis of P2R add-ons, the results indicate that the application of P2R is a common and well-established practice across all CAs. In both the previous and current data collection exercises, all CAs used P2R to address risks not covered, or not sufficiently covered, by Pillar 1. Only one authority reported a reduced scope in the application of P2R, reflecting a recent change in its methodology, which resulted in fewer institutions being assigned a P2R.

58. Figure 6 compares, where available, the P2R set by CAs for the institutions included in the submission with the average P2R reported at system level, i.e. across all institutions under the remit of a given CA. The results are broadly aligned between the sample of institutions included in the exercise and the overall system, indicating that the sample is generally representative of the full population in terms of P2R levels.

59. Looking at the figures, dispersion around the EU average (2.1%) is observed, with instances of higher average amount (above 5%) in some jurisdictions. In line with previous exercises, from the qualitative information collected on the methodology adopted to set the P2R (see also next paragraphs), higher values are typically associated with the relevant adjustment performed by CA to reflect institution specific risks informed by institutions’ ICAAP figures and use of internal supervisory benchmarks. In some instances, higher P2R add-ons were specifically associated to the specific concentration and business model specificities of the institutions (such as e.g. low TREA density).

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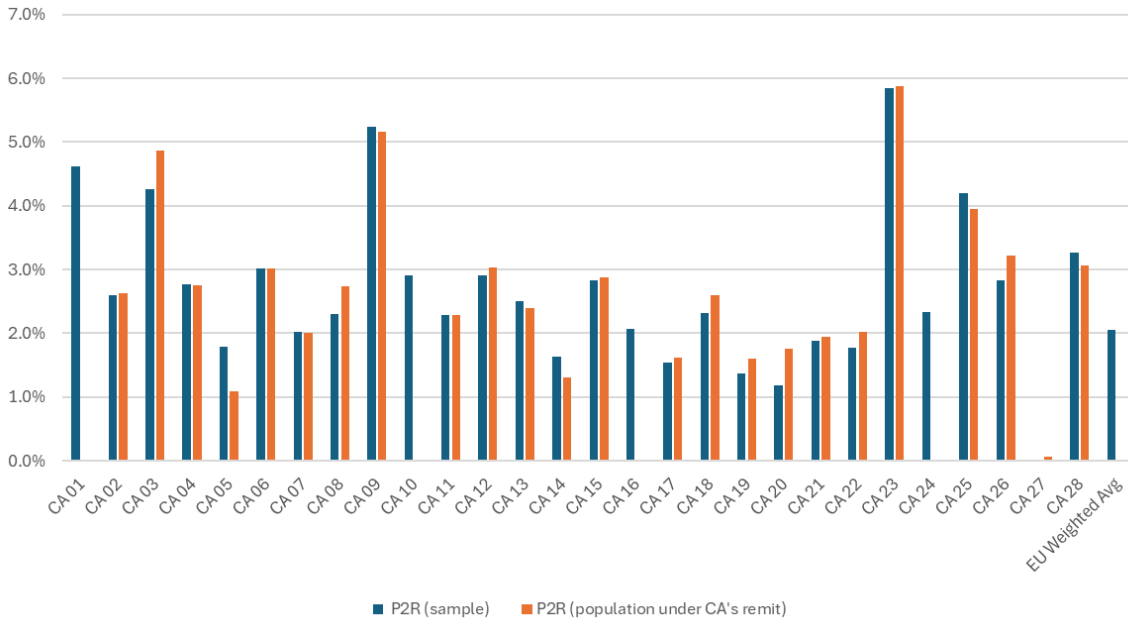


Figure 11: Average P2R by CA – comparison between institutions included in the sample and the whole perimeter of institutions within CA's remit (weighted average)

60. To better understand the composition and level of P2R across authorities, a risk-by-risk breakdown of P2R has been analysed. The results show that higher P2R add-ons are typically associated with cases where concentration risk, interest rate risk in the banking book (IRRBB), and, more broadly, other risks are identified and assessed as material by CAs such as instances of structurally low TREA density business models.

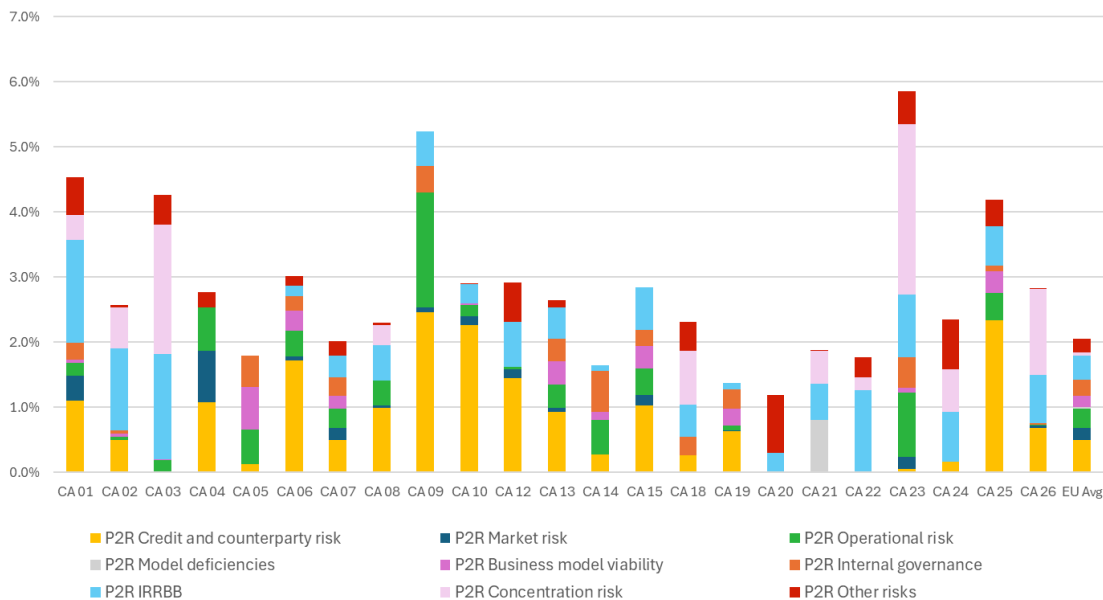


Figure 12: Average P2R risk-by-risk decomposition by CA (weighted average)

61. Focusing on the risk-specific contributions to the overall calibration of P2R at EU level, as further illustrated in the next figure, risks already covered - albeit not sufficiently - by Pillar 1 (i.e. credit

and counterparty risk, market risk, and operational risk) account for 47% of total P2R, down from 50% in the previous exercise. P2R linked to more qualitative dimensions, such as governance and business model risk, accounts for 20%, representing a slight increase compared with the previous submission (around 18%). Other significant components include interest rate risk in the banking book (IRRBB) and 'Other risks'. At an aggregated level, concentration risk plays a limited role (around 3%), while model risk related to approved internal models remains negligible overall (around 2%).

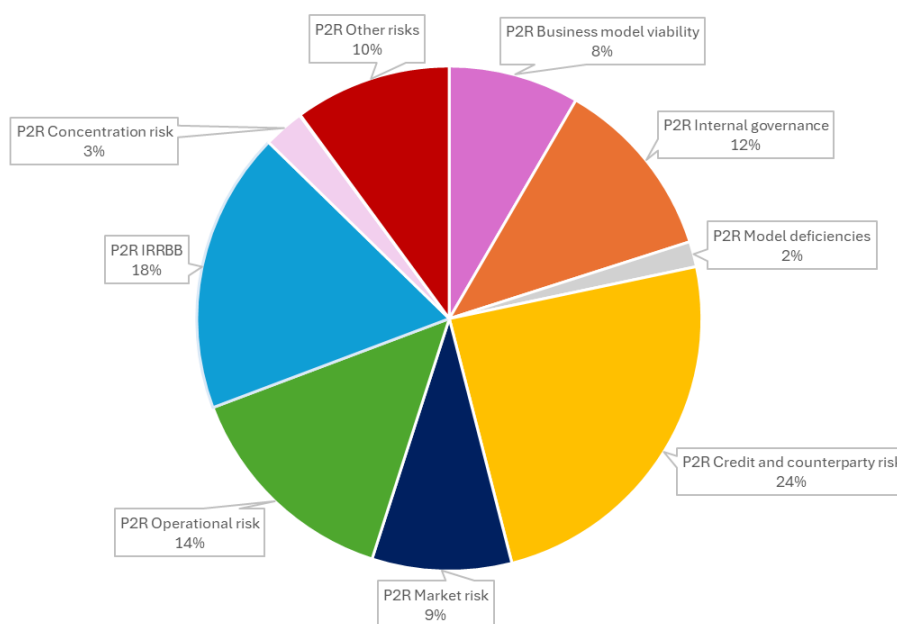


Figure 13: Percentage contribution to P2R by risk (Overall P2R = 100%)

62. 'Other risks' category primarily relate to pension risk, credit spread risk in the banking book (CSRBB), NPE coverage shortfalls (which can also broadly be seen as part of credit risk), as well as strategic, reputational, compliance and ESG risks. It is noted positively that the share of P2R stemming from the "other risks" category - particularly those not clearly specified - has decreased compared with the previous exercise, from 18% to around 10%. Further improvements are expected, notably in light of the forthcoming implementation of the revised EBA SREP Guidelines, which aims to introduce a non-exhaustive Supervisory Risk Taxonomy aimed at fostering greater convergence in the consistent identification of risks across authorities.
63. To conclude the analysis of P2R, the dispersion of P2R add-ons both within and across CAs has been assessed. The following figure shows that, in some jurisdictions, P2R add-ons display a wider dispersion across institutions, whereas in others they are more concentrated and exhibit lower variability around the median.

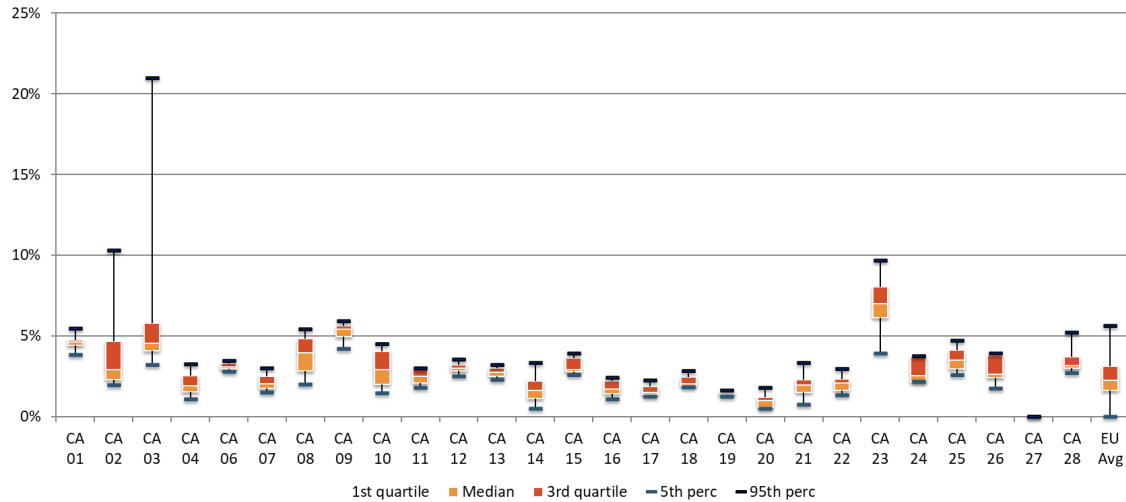


Figure 14: P2R dispersion within and across CAs

64. While the dispersion observed within a given CA may be fully justified by the specific risk profiles of the institutions subject to supervisory review, part of the variation across authorities may also reflect differences in the supervisory approaches applied. An analysis of the methodologies employed by CAs - broadly consistent with findings from the previous exercise - highlights the following common features:

- a. Nine CAs rely on holistic approaches (i.e. based on SREP scores, taking into account both inherent risks and the quality of internal controls) as the basis for determining P2R. Other CAs tend to use internally developed supervisory benchmarking methodologies, particularly when setting P2R for risks not covered under Pillar 1. In some cases, reliable ICAAP figures are used as a starting point for calibrating P2R, especially for risks included in institutions' ICAAP but not explicitly captured by own funds requirements. Hybrid approaches are also observed, combining risk-by-risk methodologies for more quantitative elements with a more holistic assessment for qualitative aspects.
- b. For risks not covered by Pillar 1, CAs generally rely on internally developed methodologies. With regard to interest rate risk in the banking book (IRRBB), a degree of consistency is observed in the use of the supervisory outlier test (SOT) as a starting point for P2R, typically considering the more severe impact between the Economic Value of Equity (EVE) SOT and the Net Interest Income (NII) SOT. Another commonly cited approach is the use of the Herfindahl–Hirschman Index (HHI) to determine P2R add-ons for concentration risk, including single-name, sectoral, and geographical concentrations, in line with the provisions set out in the EBA SREP Guidelines.

65. Based on the collected data and the analysis of SREP scores and P2R, some dispersion in P2R across CAs is still observed. While some CAs show limited differentiation across institutions within their remit, others exhibit a more dispersed distribution of P2R. This may be related to the methodologies used to set P2R and their interaction with SREP scores, which appear relatively stable over time and display limited dispersion. In a limited number of cases, the risk-by-risk decomposition of P2R is performed ex post or not at all, which is not fully aligned with the EBA

SREP Guidelines. Convergence in the implementation of P2R methodologies will continue to be monitored by the EBA as part of its ex-post implementation work.

66. Regarding the setting of the P2R-LR, compared with the previous analysis -when no P2R-LR had yet been set - there are now 11 institutions (accounting for around 4% of the sample) under the remit of four CAs for which a P2R-LR has been imposed. The EBA SREP Guidelines are cited as the primary basis for its determination.

1.2.4. P2G

67. In line with the observations from the previous analysis, all CAs confirmed that they have an internal methodology in place to set P2G. It is also noted that an increasing number of CAs refer to the use of a bucketing approach as a starting point for setting P2G, in line with one of the approaches outlined in the EBA SREP Guidelines. Despite this positive development, some divergence in P2G levels across CAs persists, particularly between those that do not set a positive P2G and those that do.

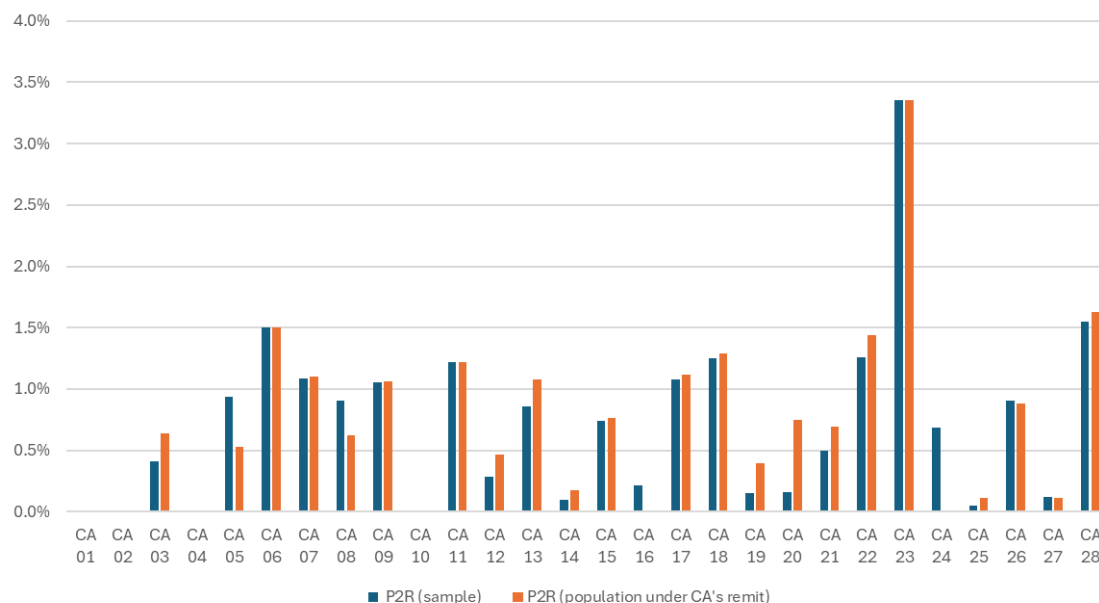


Figure 15: Average P2G by CA – comparison between institutions included in the sample and the whole perimeter of institutions within CA’s remit (weighted average).

68. This evidence is also confirmed by the figure below, where, similarly to what have been observed in the P2R dispersion analysis, the P2G set by some CAs exhibit greater dispersion, while in other instances P2G is more concentrated around the median.

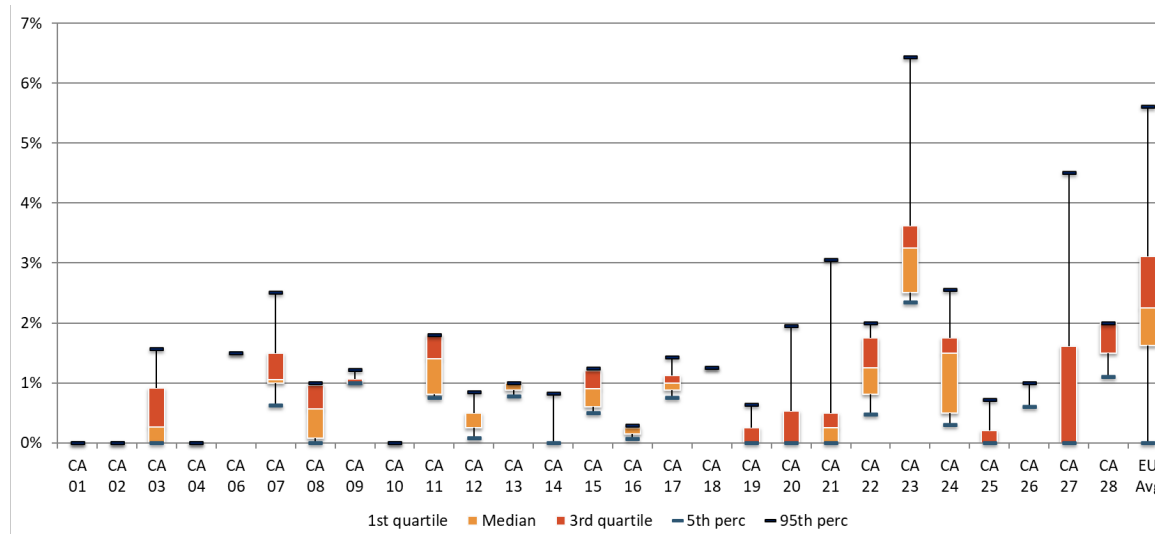


Figure 16: P2G dispersion within and across CAs

69. In line with prior observations, the dispersion could be explained by institutions' specificities but also by the different methodological assumptions underlying the determination of the P2G. Different calculation methods were noted, especially regarding the use of hurdle rates (mostly corresponding to the breach of the Overall Capital Requirement, OCR, or Total SREP Capital Requirement, TSCR, by the institutions' capital requirement in case of stress) to determine whether P2G should be set above zero. This has led to instances of P2G = 0 in some jurisdictions. A few authorities also reported the use of ceilings for P2G, with different thresholds mentioned (e.g. 4.5% or 10%).
70. In terms of P2G's scope of application, all institutions – including less significant institutions – are part of the P2G setting exercise. The frequency of P2G updates typically ranges from one to three years, depending on the frequency of the supervisory stress tests used to determine it. Several authorities noted that, even in years when P2G is not formally updated, it is still reviewed on a case-by-case basis to assess whether ad hoc adjustments are warranted based on their specific situation.
71. As far as the setting of the P2G-Leverage Ratio (LR) is concerned, similar observations to the P2R-LR's can be made. There are now 23 institutions (around 8% of the sample) under the remit of four CAs for which a P2G-LR has been set, with reference again to the EBA SREP Guidelines as the main basis for its determination.

1.2.5. Output floor and revised CRR3 and CRD6 regulatory framework

72. It is positively noted that several authorities indicated that they have already taken into account the revised CRR3 and CRD6 regulatory framework in the 2025 SREP cycle and have assessed that their P2R methodologies continue to ensure appropriate complementarity between Pillar 1 and Pillar 2.

73. More specifically, the focus has primarily been on the following aspects (not covered by all authorities):
- a. Comparing operational risk TREA figures as of 31 March 2025 and 31 December 2024, to ensure that the overall calibration of P2R remains appropriate;
 - b. Assessing the materiality of changes in TREA resulting from the revised Pillar 1 framework, in light of institutions' specific business models to check whether the outcome is consistent with the more risk-sensitive approaches envisaged by the new framework (which now includes some more specific risk drivers, such as the Loan-to-Value – LTV which might have different impacts based on the specific business model of an institution).
 - c. Evaluating the need to remove potential elements of double counting previously embedded in P2R that are now covered by the revised Pillar 1 requirements (e.g. where P2R addressed Pillar 1 model deficiencies that no longer apply under CRR3 - such as the removal of AMA for operational risk, the discontinuation of own LGD/CCF IRB estimates for exposures to institutions and large corporates, or the higher risk weights for foreign currency lending to unhedged borrowers provided by new CRR Article 123a).
74. In some cases, the outcome of this assessment led to changes in P2R methodologies, mainly related to the use of supervisory benchmarks to determine credit risk and operational risk P2R add-ons.
75. As the vast majority of European LSIs do not use regulatory-approved internal models to determine Pillar 1 requirements, in many jurisdictions the output floor is expected to have only a marginal, if any, impact on the capital framework. Overall, in 2025, only a very limited number of institutions (one SSM SI and one SSM LSI) were reported to be constrained by the output floor in the EU. In such cases, authorities indicated that a case-by-case assessment was carried out to ensure an appropriate calibration of P2R. As most institutions (both within and outside the SSM) that are expected to become constrained by the output floor will do so between 2026 and 2030, this aspect, along with the more general need to ensure the complementarity between Pillar 1 and Pillar 2 frameworks will continue to be closely monitored going forward, in line with the provisions that will be included in the updated EBA SREP Guidelines.

1.3. Convergence in supervisory colleges in 2025

1.3.1. Background

76. The EBA has a statutory role in promoting the efficient and effective functioning of colleges and supporting supervisory convergence. In particular, the EBA's Founding Regulation assigns the EBA tasks related to promoting and monitoring the consistent and coherent functioning of colleges, and the CRD provides for a role for the EBA in the context of colleges, including under Article 116 CRD.
77. In addition, the EBA reports annually to the European Parliament and the Council on the degree of convergence of the supervisory review and evaluation process, in accordance with Article 107

CRD. The EBA's monitoring of supervisory colleges forms part of the convergence toolkit supporting that reporting.

78. Building on the approach described in previous convergence reports, the EBA implements a close monitoring framework under which a limited number of supervisory colleges are followed in greater depth. This approach, which is reviewed every three years, results in a list of colleges to be more closely followed by the EBA and allows the Authority to observe in practice how colleges organise the annual supervisory cycle and to identify areas where further convergence may be needed.
79. In the context of these closely monitored colleges, the EBA attends college interactions discussing the key deliverables; follows the group risk assessment and joint decision processes on capital, liquidity and recovery planning; assesses how the priorities for prudential supervisors published annually by the EBA¹⁰ are incorporated into college activities and the college supervisory examination programme; maintains close contact with the supervisory authorities' staff responsible for colleges; and reviews, comments on and signs the written coordination and cooperation arrangements (WCCAs).

1.3.2. Overview of EBA interactions with supervisory colleges in 2025

80. The current college monitoring approach was approved in 2023 and is applicable throughout 2024-2026. The selection of colleges was based on a set of criteria aimed at ensuring an appropriate level of diversity among the monitored banking groups, in terms of group size and complexity, risk profile and business model, as well as differences in the composition of the college, for example whether the consolidating supervisor is within or outside the Banking Union and the involvement of third-country authorities. The selection also aimed to ensure a rebalancing of the monitored sample over time, including by extending coverage to structures implementing a college set-up for the first time (i.e. colleges established pursuant to Article 116(1a) CRD and Intermediate Parent Undertaking colleges), and by focusing on colleges where further improvements in functioning could be expected, as informed by the outcome of the Key Performance Indicators (KPI) exercise conducted at the end of 2023.¹¹
81. In 2025, the EBA continued to monitor the supervisory colleges that had been identified in 2023 and whose close monitoring had started in 2024. Accordingly, the EBA's close monitoring activities in 2025 covered six supervisory colleges. Over the year, EBA staff participated in nine supervisory college meetings, spanning the main phases of the college cycle and covering key deliverables and discussions, including risk assessments, recovery plan assessments, and joint decisions on capital and/or liquidity requirements.

¹⁰ Until 2025, the EBA published priorities for prudential supervisors in the ESEP on an annual basis. As of 2026, these priorities are no longer published as a standalone document but integrated into the EBA Annual Work Programme.

¹¹ The Key Performance Indicators (KPI) exercise was introduced by the EBA in 2023 to support the assessment of the functioning of supervisory colleges. The exercise captured qualitative information across four key dimensions: (i) the level of cooperation among college members, including information sharing and joint supervisory activities; (ii) the quality of college meetings, including participation, organisation and effectiveness of discussions; (iii) the quality of key college deliverables, such as risk assessments and joint decisions; and (iv) college processes related to key deliverables, focusing on the planning process for the joint decision timeline.

Quarter	Number of meetings	Topics discussed	Format
Q1-2025	3	Recovery plan (3)	Virtual (3)
Q2-2025	3	Risk assessment (3)	Virtual (1); Physical (1); Hybrid (1)
Q3-2025	1	Risk assessment (1)	Physical (1)
Q4-2025	2	Joint decisions on capital and liquidity (1); Risk assessment (1)	Virtual (1); Hybrid (1)

Table 1: EBA participation in supervisory college meetings in 2025

1.3.3. Findings from the EBA's close monitoring of supervisory colleges in 2025

82. This section summarises the findings emerging from the close monitoring of supervisory colleges in 2025, using the dimensions reflected in the EBA's qualitative KPIs for supervisory colleges.

Level of cooperation

83. Across the six colleges closely monitored by the EBA, cooperation was assessed overall as good, with information exchange generally taking place and college discussions allowing supervisory authorities to consider relevant early-warning signals (e.g. changes in asset quality, capital ratios, or concentration indicators). At the same time, the monitoring indicates that information sharing is sometimes primarily driven by the consolidating supervisor. While this is a natural and expected outcome of the mandate of the consolidating supervisor, it seems to confirm that, consistently with the outcome of previous surveys, there may still be scope for a more proactive and interactive participation by host authorities in college exchanges.

84. The monitoring also pointed to the importance of ensuring that other relevant authorities are informed of material supervisory findings where appropriate, for example, where issues may be relevant beyond prudential supervision.

Quality of college meetings

85. The college meetings were generally reported as being well managed, with sufficient time for exchange of views and, in many cases, engagement with the supervised institution. In particular, most monitored colleges invited bank representatives to present and enabled questions from college members, supporting a direct exchange on the group risk assessment and other supervisory topics.

86. Regarding challenge and debate, the monitoring notes that constructive challenge is present, though it may be unevenly distributed, with examples where challenge was primarily driven by the consolidating supervisor rather than being fully mutual.

87. At the same time, the monitoring highlighted that in some cases documentation was shared only shortly before meetings, limiting preparation time. In addition, while meetings often include contributions from each authority, discussions are still structured predominantly on an entity-by-entity basis. The monitoring suggests that this may leave scope to further strengthen

multilateral, risk-driven discussions that consider the group as a whole, alongside entity-specific exchanges.

Quality of key deliverables

88. Key deliverables, including supporting documentation for the risk assessment and joint decision, were generally assessed as complete, well-reasoned, clear and coherent across the monitored colleges.
89. Nonetheless, some monitored colleges relied materially on written procedures outside meetings for certain elements, for example where aspects of joint decisions were agreed mainly in writing, with limited discussion on the quantitative proposals for the joint decisions on capital and liquidity requirements and/or guidance during the college meetings dedicated to the group risk assessment.
90. Finally, some monitored colleges included explicit mapping of supervisory activities to the EBA's priorities for prudential supervisors, either through dedicated presentations or specific sections in the group risk assessment presentations. The monitoring indicates that such mapping can be a useful practice, although the time allocated to these discussions varied across monitored colleges.

College processes related to key deliverables

91. The monitoring indicates that joint decision timelines were, in general, prepared and shared with college members in a timely manner, and that consolidating supervisors actively facilitated the overall process. At the same time, the monitoring suggests that further improvements could be achieved by strengthening the timeliness of information sharing.

1.3.4. Good practices identified in non-monitored colleges

92. In addition to its close monitoring activities, the EBA identified examples of good practices in non-monitored supervisory colleges that support effective information sharing and efficient cooperation among college members. These include the proactive sharing of information on on-site missions or inspections within the college, supporting timely awareness among members of supervisory work being conducted, as well as, inviting college members to meetings with the bank held throughout the year outside the formal annual college meeting. Such practices can contribute to more efficient use of supervisory resources and foster ongoing engagement and shared understanding among authorities over the course of the supervisory cycle.

1.3.5. Future work

93. With the current three-year college monitoring approach concluding at the end of 2026, the EBA will review the close monitoring framework and the list of supervisory colleges to be applied over the 2027–2029 period. This review will take into account the experience gained during the current cycle and the evolving supervisory landscape.

1.4. Monitoring and benchmarking

1.4.1. Own funds, MREL/TLAC monitoring

94. In the context of Article 26(3) CRR¹², which requires CAs to consult EBA before granting permission for new forms of capital instruments to be classified as Common Equity Tier 1 instruments, the EBA continued its assessment of CET1 instruments - with the purpose of their eventual inclusion in the CET1 list¹³ - and supported CAs in the implementation of follow-up actions.
95. In 2025, the EBA continued its work on legacy own funds instruments, building on the extensive work undertaken since 2020, which aimed at ensuring the application of consistent approaches towards legacy own funds instruments with the aim of maintaining a clear subordination ranking within institutions' capital and to avoid unnecessary complexity in the prudential framework. The EBA maintained close and sustained scrutiny of the remaining legacy instruments, also in 2025, which contributed to a continuous and material decline in the stock of legacy own funds instruments. On the basis of this work, and given that the remaining stock is both limited and steadily shrinking, the EBA concluded its dedicated monitoring activity. Going forward, the EBA will not prioritise the monitoring of legacy instruments, while maintaining its review of the quality of own funds and eligible liabilities and With confidence that competent authorities will continue to monitor the remaining limited and specific cases on the basis of the guidance provided.

1.4.2. Liquidity risk

96. In 2025, the EBA continued to monitor the implementation of the LCR and the NSFR in the EU. At this point in time, the supervisory convergence work focuses on the prudential treatment of deposits on-boarded via on-line deposit platforms as well as on the liquidity treatment of multi-borrower credit facilities in an intragroup context, where one of the entities qualifies as financial institution. In terms of simplification, the EBA is aiming at consolidating the past liquidity guidance in a single report by 2027.

1.4.3. Interest rate risk in the banking book (IRRBB) monitoring

97. The EBA has published the second and final Heatmap report¹⁴ covering non-maturity deposits indicators, complementary dimensions on SOT NII (Supervisory Outlier Test, Net Interest Income) assessment, commercial margins, and hedging strategies. In addition, (also following the publications of this report, the EBA notes that there are still divergences with regard to the compliance with the Pillar 3 disclosures and divergences in terms of CSRBB perimeter determination. Therefore, the EBA continues the monitoring of these two aspects and engaging with members to ensure a correct and harmonised application of the IRRBB framework.

¹² Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (OJ L 176, 27.6.2013, pp. 1–337, ELI: <http://data.europa.eu/eli/reg/2013/575/oj>).

¹³ EBA shall establish, maintain and publish a list of all forms of capital instruments in each Member State that qualify as Common Equity Tier 1 instruments as per Article 26(3), second subparagraph CRR.

¹⁴ [Report IRRBB heatmap implementation.pdf](#)

98. Moreover, the EBA is currently providing assistance with regard to the application of the shocks to a particular set of products linked to the inflation.
99. Finally, together with the accounting team, and in line with the past Management Report, the EBA is collaborating and in the area of IASB's project on risk mitigation accounting (RMA).

1.4.4. Benchmarking exercises

100. The EBA conducts its annual benchmarking exercise of internal models, in accordance with Article 78 of the CRD that was recently extended to IFRS9. For credit risk, it can be noted that the exercise is actively used by supervisors in the model review performed by CAs. For market risk, the extension to cover the Standardised Approach for the Fundamental Review of the Trading Book (FRTB-SA) will continue and is key to ensuring harmonised implementation of FRTB-SA in the EU.

1.4.5. Large exposures reporting

101. The 2025 EBA analysis of EEA credit institutions' Large Exposures reporting practices has revealed significant inconsistencies in how credit institutions allocate similar exposures to sectors and NACE codes¹⁵. These discrepancies reflect divergent applications of CRR definitions and reporting ITS instructions, with potential direct implications for risk weights, large exposure limits and liquidity metrics, and ultimately for the level playing field across the EEA.
102. To address these inconsistencies and report discrepancies among EEA credit institutions, the EBA launched a corrective exercise, in progress, aimed at developing reference lists for a large portion of Large Exposures subject to sector and/or NACE code. This solution provides a concrete supervisory benchmark to align related institutional practices. By reducing discretion in sector and NACE code allocation, the exercise improves data quality, enhances comparability across institutions and jurisdictions, and supports a more harmonised and consistent application of prudential legal texts.

2. Resolution and crisis management

2.1. Operationalisation of resolution tools

103. Resolution authorities (RAs) report continued progress in the operationalisation of resolution tools, with better documented processes, embedded in more holistic operational processes and subject to continuous testing initiatives, reflecting a shift towards operational readiness.
104. Generally, testing is becoming more embedded in RAs practices, with increasing use of simulations exercises to assess operational readiness, even if often focused on specific elements rather than end-to-end execution.

¹⁵ [EBA Staff Paper - The Impact of Prudential Reporting Distortions: Time to Prioritize Data Integrity](#)

105. RAs identified some persistent challenges such as those affecting the bail-in of some liabilities held by third-country investors / governed by third-country law (together, “**third-country liabilities**”) or related to institutions’ data-related limitations. Dependencies and coordination with numerous external stakeholders, authorities, market infrastructures etc. are, as in previous cycles, the main drivers of complexity to resolution execution.
106. Looking ahead, RAs plan to strengthen their operational readiness and capabilities through expanded simulation exercises on resolution plans and procedures required to execute resolution tools.
107. In order to contribute to the further progress of testing of resolution planning, the EBA has recently published a handbook on simulation exercises for resolution authorities¹⁶ that provides a comprehensive framework of best practices, methodologies and processes to support resolution authorities in enhancing their preparedness and operational capabilities through structured simulation exercises. Going forward, the EBA will continue to contribute to simulation exercises in crisis through the implementation of its new role¹⁷ under the revised BRRD to test coordination among authorities for EU cross-border groups across the various phases of the crisis management continuum from recovery to resolution implementation.

2.1.1. Bail-in execution

108. The enhancement of arrangements supporting bail-in execution remained a key focus during 2025 in order to ensure the operational feasibility and credibility of the bail-in tool. Compared to previous cycles, further progress has been achieved in developing institutions’ playbooks, bail-in calculators, templates related to decisions, notifications and communications and additional operational documents. These elements are now largely in place and complemented by national resolution handbooks and operational governance frameworks.
109. At the same time, progress remains uneven across Member States. While core arrangements are generally established, RAs continue to identify challenges affecting their-ability to execute the bail-in tool. These include operational complexity, legal uncertainty and cross-border constraints, particularly in relation to third-country liabilities. RAs highlight challenges related to the recognition and enforceability of their bail-in powers in non-EU jurisdictions, as well as constraints arising from applicable third-country securities laws¹⁸.
110. Dependencies on external stakeholders, such as central securities depositories (including their settlement systems), trading venues, market authorities and securities regulators, further contribute to execution challenges. Mitigation measures include contractual recognition clauses, legal advice/opinions obtained from institutions’ legal counsel (and, in very limited cases, RAs’ own legal counsel), ex-ante legal and operational analysis and engagement with relevant third-country RAs to better understand how bail-in powers may be executed in conformance with applicable local requirements e.g. under local securities laws.

¹⁶ [Handbook on simulation exercises for resolution authorities.pdf](#)

¹⁷ [Art. 128 c - Directive - EU - 2026/806 - EN - EUR-Lex](#)

¹⁸ [See Section IV of the FSB Principles on Bail-in Execution for background.](#)

111. Testing is increasingly used to assess operational readiness and identify gaps. Where bail-in execution has been used in simulations or dry runs, these exercises have provided insights into data availability, sequencing of operational steps necessary and interactions and engagement with external stakeholders.
112. Arrangements for stakeholder coordination and communication are also developing, with templates for notifications, structured communication plans and stakeholder mapping frameworks increasingly mature. However, these elements remain to be fully tested, particularly their feasibility in cross-border contexts.

2.1.2. Transfer strategies – operationalisation and use of arrangements

113. RAs report that arrangements supporting transfer strategies are being progressively developed, although they remain less mature than those for bail-in. Compared with previous cycles, more RAs reported the completion and adoption of transfer playbooks, separability analyses, operational templates and virtual data rooms, supporting the sale of business, the bridge institution and asset separation tools.
114. Among the different transfer tools, the sale of business is generally the most advanced. RAs report that work has focused on defining transfer perimeters, developing separability analyses and establishing virtual data room structures to facilitate potential transactions. In some cases, preparatory work also included identifying potential buyers and assessing market capacity. Where testing has taken place, sale of business has shown a relatively higher degree of operational readiness compared to other transfer tools, although important challenges remain, particularly in relation to data quality or valuation processes.
115. While RAs have identified the main operational steps and governance frameworks required to establish and operate a bridge entity, practical implementation aspects remain, generally, at an earlier stage. Specific issues tackled by RAs are related to the transfer perimeter or type of transfer (share versus assets), the establishment of governance structures, operational continuity and the interaction with market infrastructures. Testing of bridge institution arrangements remains limited, and further work is needed to translate conceptual frameworks into operational capabilities. Still, some RAs have concrete experience in setting up bridge institutions while a few other RAs indicate they have set-up shell bridge institutions, ready to be operationalised should this be needed.
116. The operational development of the asset separation tool is at the lowest relative stage of progress. RAs report that initial work has focused on identifying assets that could be subject to separation and on developing high-level frameworks. However, operational aspects, including valuation, asset transfer mechanics and ongoing management of separated assets, are less developed. In practice, asset separation is often considered in combination with other strategies, which further limits the extent of dedicated operational arrangements and testing.
- 117.
118. Overall, RAs highlight challenges related to differing legal regimes, including insolvency, company and competition law, as well as the need to obtain approvals from multiple RAs.

119. While progress is evident, the level of operationalisation remains uneven across transfer options. RAs indicate concrete plans to expand the development and testing of transfer-related arrangements through multi-annual testing programmes.
120. Going forward EBA would further contribute to the progress in the operationalisation of resolution tools through further monitoring including through the monitoring report mandated¹⁹ to the EBA under the revised BRRD of the actions and preparations of resolution authorities to ensure an effective implementation of the resolution tools and powers in the event of resolution.

2.1.3. Variant resolution strategies

121. Variant resolution strategies (VRS) are broadly included in RAs' resolution plans. The bail-in tool generally forms the basis for most institutions' preferred resolution strategy (PRS).
122. The sale of business tool typically forms the basis of institutions' VRS and is very frequently part of both PRS and VRS. The bridge institution tool is rarely part of the PRS but is often featured in the VRS.
123. As of end-2025, most RAs have identified VRS for all or most of their resolution entities in their resolution plans. Where identification is not yet complete, work is actively ongoing and linked to further analysis or upcoming resolution planning cycles.
124. Operationalisation of VRS has started in most jurisdictions. As of end-2025, a large majority of RAs and institutions had begun working on the operationalisation of defined VRS. This work typically builds on existing PRS capabilities and focuses on playbooks, separability analyses, operational step documents and governance arrangements.
125. RAs report effective reuse of PRS capabilities, such as governance, valuation, MIS, when operationalising VRS, to avoid duplication, contain costs and ensure internal consistency between institutions' PRS and VRS.
126. Identified challenges mainly relate to legal, tax, competition, data and resource constraints, as well as feasibility considerations for transfer-based strategies. RAs manage these through proportionality, phased implementation and continuous dialogue with institutions.
127. Only a very small number of RAs reported instances where elements of the PRS and VRS conflict. In such cases, issues are addressed by leveraging common capabilities and aligning requirements across strategies.

¹⁹ Article 37b of Directive (EU) 2026/806 of the European Parliament and of the Council of 30 March 2026 amending Directive 2014/59/EU as regards early intervention measures, conditions for resolution and funding of resolution action and Directive 2014/24/EU as regards valuation services in resolution (OJ L, 2026/806, 20.4.2026, ELI: <http://data.europa.eu/eli/dir/2026/806/oj>).

2.2. Management information systems (MIS) for valuation

2.2.1. Background

128. Maturity remains uneven across jurisdictions and institutions, although gaps are reducing compared to previous cycles. As in previous years, resolution authorities continue to report key challenges related to automation and the operational ability to deliver valuation data within short timelines, documentation completeness, governance and data-quality assurance.
129. It is observed that MIS for valuation is increasingly being considered as an important capability within the operationalisation of resolution tools. The MIS for valuation priority is therefore discontinued from 2026 as a standalone priority but it will continue to be considered under the other EREP priorities.

2.2.2. MIS for valuation: data production

130. RAs report continued progress in institutions' data production for valuation purposes. Compared with previous cycles, most institutions have now established baseline governance arrangements, documented data production processes and defined roles for data management and MIS operations.
131. However, authorities indicate that the quality and completeness of documentation remain uneven, primarily across jurisdictions, with differences at institution levels also observed. While data production and validation processes are generally documented, in some cases the documentation is partial or lacks sufficient clarity and consistency. Similarly, although roles and responsibilities are typically defined, accountability frameworks are not always fully formalised, which may limit clear ownership and escalation in resolution cases.
132. Authorities also note that formal management approval processes for valuation data submissions are not yet consistently embedded, which may reduce the level of quality assurance attached to the data provided to authorities. Data-quality assurance frameworks are developing across institutions, but the documentation and demonstrability of data-quality controls remain uneven.
133. In operational terms, most authorities confirm that institutions are able to produce timely valuation data and that MIS capabilities have improved compared to previous cycles. A 24-hours' deadline for the delivery of critical valuation data is seen as the benchmark by a significant number of authorities. However, institutions' ability to consistently meet this expectation remains mixed. Authorities report that in several cases institutions still rely on manual (or partly manual) processes or system workarounds, and that limited automation and fragmented data sources may constrain the speed and flexibility of data production.
134. Authorities indicate that they expect further improvements to strengthen automation, data-quality assurance, documentation and accountability in order to ensure reliable and timely data production under resolution conditions (Figure 17).

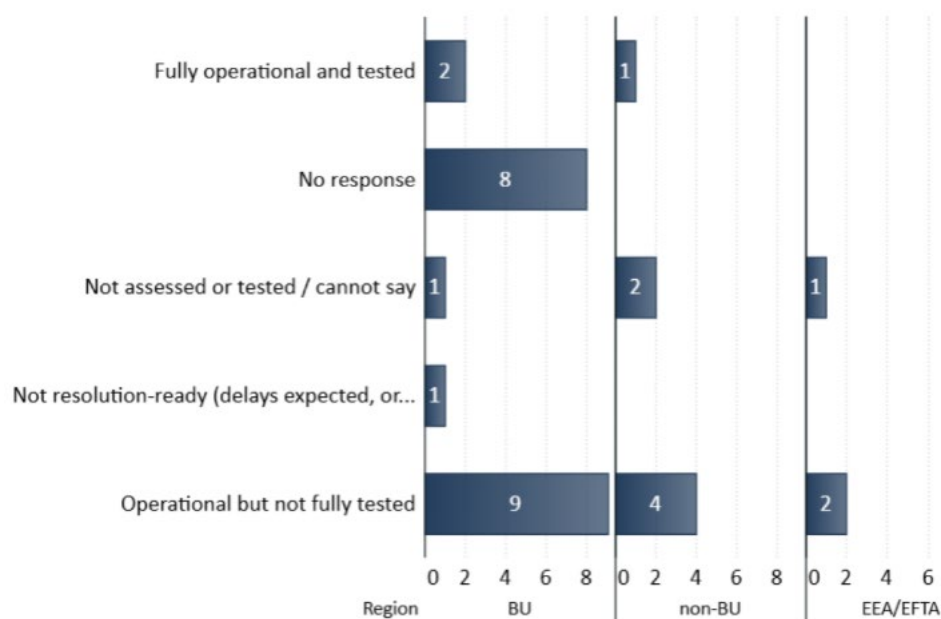


Figure 17: Most RAs estimate that institutions have reached some operational maturity but with need for continued testing

135. While the MIS for valuation priority is no longer a key priority for 2026, the RAs highlighted that they will keep focus on this element. This is driven by the fact that quick and reliable information for valuation is crucial for initiating a resolution action.

2.2.3. Operationalisation of the VDR

136. Virtual data rooms (VDRs) are increasingly embedded in RAs' operational frameworks and are widely expected to be used for the exchange of valuation data during resolution processes (Figure 18). Compared with the previous cycle, authorities report greater operational preparedness and clearer allocation of responsibilities for establishing and managing VDRs.

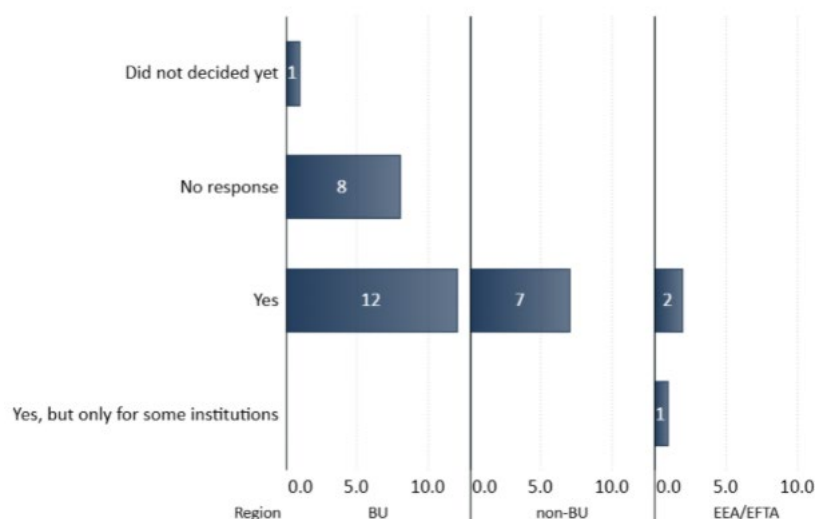


Figure 18: RAs expecting to operate with a VDR in case of resolution

137. In most jurisdictions, responsibility for setting up and operating the VDR is clearly assigned to institutions, reflecting the expectation that banks should be operationally prepared to deploy a VDR when required. Institutions have generally made progress in establishing operational arrangements for VDR management and data population.

138. Authorities indicate that documentation of VDR processes is developing, although in some cases it remains partial. Similarly, while roles and responsibilities for VDR management are increasingly defined, governance frameworks remain at different levels of maturity across jurisdictions.

139. Several authorities report that access to institutions' VDRs has been granted and, in some cases, tested. However, systematic access testing has not yet taken place across all jurisdictions, and some authorities have not yet assessed institutions' operational capabilities in this area.

140. Where assessments have been conducted, authorities generally report positive feedback regarding institutions' ability to deliver valuation data and populate VDRs within expected timelines. In many cases, institutions have defined timelines for VDR set-up and data population, although such timelines are not yet consistently established across jurisdictions.

141. Authorities also note that assurance regarding the freshness of valuation data remains mixed, as many institutions rely on fixed reference dates, with varying frequency of update, rather than dynamically refreshed data points.

142. Overall, authorities consider that functional VDR frameworks are now largely in place, representing progress compared to previous cycles. At the same time, further work is expected for testing to ensure that VDRs can be deployed reliably under resolution conditions and additional advancements are needed to strengthen documentation and clarify governance arrangements.

2.2.4. Testing activities

143. Compared with previous cycles, RAs report that testing institutions' MIS for valuation capabilities is increasingly embedded in their practices, with most authorities either conducting tests in 2025 or planning them within the multi-annual testing programmes (Figure 19).

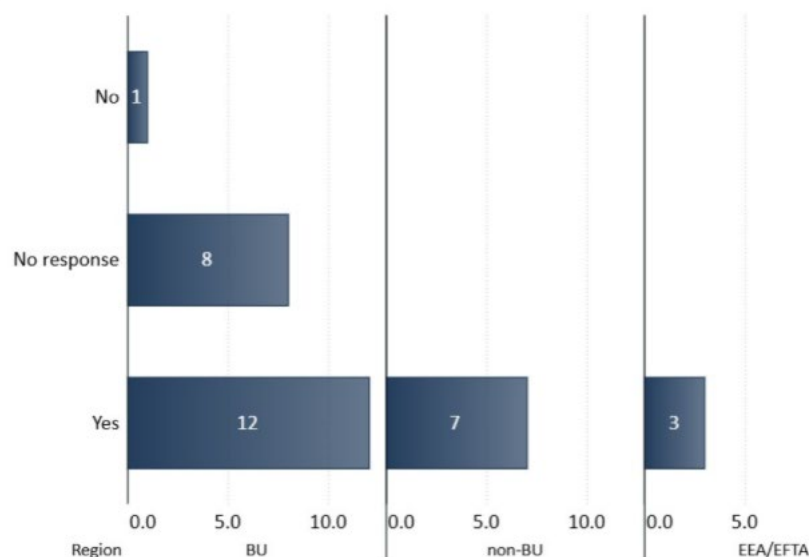


Figure 19: All RAs that answered to the survey, except one, indicate they included testing activities for MIS for valuation in the multiannual testing programme for institutions.

144. Most authorities report that institutions tested aspects of their MIS for valuation during 2025, although the scope and intensity of testing vary significantly across jurisdictions. Testing activities typically focus on data production capabilities and the ability to populate and operate VDRs, identifying and cataloguing the gaps in relation to RAs' needs and expectations, while full end-to-end testing of MIS processes remains less common.

145. Institutions are actively identifying operational constraints, which are mainly linked to ongoing MIS development, limited automation, fragmented data sources, data-quality processes and practical challenges in VDR use, and implementing mitigation measures on their MIS for valuation capabilities. More systematic data quality checks are expected from 2026 onwards. Progress is noted compared to previous cycles by having more elaborate and standardised tests in place, able to identify and catalogue the gaps in relation to RAs' needs and expectations.

- **Data production testing in 2025 focused mainly on reporting capabilities**, while governance and validation aspects were tested/assessed less frequently. Still, in several jurisdictions, **no data production testing was carried out** during the year.
- **Verification of data completeness, accuracy and quality remains limited**: with only a minority of authorities that performed checks in 2025, and most planning to start or expand such checks from **2026 onwards**, in line with multiannual testing programmes.

- **Where checks were performed, authorities relied mainly on reconciliation, consistency and completeness reviews**, often against existing supervisory or resolution data, with the scope of verification generally constrained.
- **Authorities that assessed data quality report broadly positive outcomes**, noting improvements in documentation, self-assessments, resourcing and the involvement of external auditors, although some cases required **resubmissions to address quality issues**.

146. Authorities use a range of testing approaches, including simulation exercises. Otherwise, RAs expect institutions to provide self-assessments and progress reporting, sometimes complemented by reviews by internal or external auditors. The tests often require institutions to produce valuation data within short timeframes, typically within hours, a timeframe of 1 to 7 days, and may involve the provision of either full or partial valuation data sets.

147. Overall, authorities indicate that testing MIS for valuation capabilities is progressing and providing increasing assurance on institutions' operational readiness, while also confirming the need for broader, regular exercises with wider coverage of MIS for-valuation capabilities (data production, VDRs, governance, data quality and timeliness) including under resolution-like scenarios. Some authorities have started to conduct such testing, often as part of broader exercises such as bail-in simulations.

2.3. End of MREL monitoring

148. Compared to 2024, building up own funds and eligible liabilities is not a separate priority anymore, given that most banks have met their MREL. However, to increase the effectiveness of the bail-in tool, MREL qualitative aspects are to be further monitored as part of the operationalisation of resolution tools, and quantitative aspects will be followed and disclosed by the EBA in its [MREL Dashboard](#).

2.4. Operationalisation of liquidity strategies in resolution

149. RAs report overall progress in liquidity in resolution during 2025, notably in improved estimation of liquidity needs, supported by methodologically improved and resolution-specific scenarios, as well as enhanced collateral identification and reporting by institutions.

150. However, progress remains uneven across jurisdictions and institutions and largely untested, as limited testing took place in 2025. Key challenges persist in MIS capabilities, operationalisation and mobilisation of collateral - especially non-central-bank-eligible and non-marketable assets - and in ensuring sufficiently severe and resolution-specific assumptions in the scenarios.

151. Institutions' arrangements and capabilities broadly meet RAs' expectations. Planned testing from 2026 onwards is expected to further validate frameworks and strengthen confidence in institutions' liquidity strategies in resolution.

2.4.1. Assessment and testing of the feasibility of liquidity strategies

152. Compared to previous cycles, during 2025, RAs increasingly required institutions to demonstrate the feasibility of their liquidity strategies in resolution, mainly through self-assessments, scenario simulations, walkthroughs and limited dry runs, with more structured testing planned from 2026 onwards.
153. Authorities' assessments indicate that institutions have stronger capabilities in collateral identification and reporting, particularly for central-bank-eligible assets, supported by improvements in data quality, governance frameworks and general MIS. This progress reflects, in part, alignment with recovery planning, where access to central bank facilities is a key liquidity source.
154. Collateral mobilisation of non-central-bank-eligible, non-marketable or non-liquid assets remains the least mature element, as in previous cycles. This aspect continues to rely on theoretical assumptions and limited practical experience. Feasibility is inferred from past experience rather than demonstrated through testing.
155. Testing focuses primarily on documentation, governance arrangements and data availability, rather than on a holistic approach. Where collateral mobilisation is tested, it is mostly based on desk-based reviews.
156. From a different perspective, RAs report efforts to coordinate on liquidity in resolution at national, EU and international level, mainly through information exchanges, crisis management structures, resolution colleges and simulation or testing exercises. However, these coordination arrangements remain fragmented and not supported by dedicated liquidity in resolution frameworks, with the focus so far on preparedness rather than execution. Feedback to institutions continues to highlight operational and execution gaps, including weaknesses in data quality, timeliness, general MIS capabilities, governance clarity and process definition, with a need for clearer steps, roles and timelines for mobilisation.
157. Overall, while strong progress is observed compared to previous cycles and some good practices, emerge, such as alignment with business-as-usual processes, higher automation and regular testing of reporting or central bank access are not yet widespread.
158. As in previous cycles, a significant number of authorities continue to express concerns about the credibility of core liquidity strategies, citing operational constraints (i.e. collateral depletion, lack of market confidence), reliance on theoretical options (documented, but not tested) and uncertainty regarding market conditions and access to lender-of-last-resort facilities in a resolution scenario.

2.4.2. Time needed for reporting, collateral mobilisation and access to liquidity

159. Compared to previous cycles, resolution-specific liquidity reporting shows improvement. Where tested, institutions were generally able to produce and submit liquidity reports within expected timeframes, with progress observed over repeated exercises. The general next step is to

require that institutions prepare and submit these reports under even more demanding and realistic cut-off times.

160. The timing of collateral mobilisation and the ability to access liquidity sources remain largely untested, as in previous cycles. Most authorities continue to rely on institutions' own estimates or past experience, particularly with central-bank-eligible collateral, rather than on dedicated dry runs or independent verification. These kinds of tests are more difficult to set-up and run. The EBA notes preparatory work towards such exercises.
161. Only a limited number of authorities have independently tested reporting or mobilisation timelines, with more structured testing planned mainly within 2026–2028 multi-annual programmes.
162. As in past exercises, and in alignment with the EREP, RAs were asked to rank the speed of liquidity sources and strategies to provide liquidity in a resolution context. Central bank facilities continue to be identified as the fastest way to obtain liquidity in resolution, followed by inter-institution borrowing and emergency borrowing lines, while retail and corporate deposits are generally considered the slowest option.
163. The use of explicit resolution-specific timelines in testing or simulations could be expanded. As a good practice, one RA performed tests involving a large number of institutions, in cooperation with the supervisor, using resolution-specific timelines, for three consecutive years. Where timelines have been imposed, institutions reported challenges related to data aggregation, definitions, time zones and granularity, which are being addressed through clarifications and format adjustments.

	Identification	Reporting	Mobilisation	Not performed / Not applicable
Desk review of documentation and governance	11	8	12	10
Review of tests' results	7	8	3	13
On-site inspections	2	1	2	21
Deep dives	2	2	3	20
Data submission / reporting requirements	12	11	5	9
Other (please specify)	6	5	6	17

Figure 20: Methods RAs used to assess institutions' ability to identify, mobilise, and report collateral that could be available in a resolution scenario

164. With increased testing and assessments, authorities continue to identify operational bottlenecks and dependencies that could affect timely access to liquidity, including constraints related to central-bank-eligible collateral, which may be depleted at the time of resolution, limited experience with mobilisation, and uncertainty regarding market and counterparty behaviour in crisis conditions.

165. Overall, while reporting capabilities are supported by evidence from testing and show improvement compared to previous cycles, the timing and feasibility of collateral mobilisation and liquidity access in a resolution scenario, while showing some advancement, remain in need of further testing.

2.4.3. Use of scenarios and assumptions on the speed of crisis

166. A larger share of resolution authorities, compared to previous cycles, required institutions to use either a standard scenario or minimum scenario features, including severe stress assumptions, different crisis speeds and coverage of all resolution phases, when assessing liquidity needs in resolution. A smaller group of authorities however did not impose restrictions concerning the definition or usage of scenarios.

167. Scenarios are typically based on severe idiosyncratic liquidity stress and incorporate different crisis speeds, notably fast-moving (and the introduction of the very fast, re resolution oriented, "jump-to-default" option) and slow-burning scenarios. Developing scenarios for liquidity in resolution is a complex task and the scenarios developed to meet supervisory considerations are not necessarily best suited for resolution purposes. Developing specific resolution scenarios is a priority for future work under this component of liquidity in resolution.

168. Resolution scenarios continue to cover all phases of the crisis, including pre-resolution, FOLTF, the resolution weekend and post-resolution stabilisation, and are more severe than recovery scenarios, applying stronger run-off assumptions, assuming constrained or exhausted recovery options and resolution-specific features, like collateral depletion, lack of market confidence coupled with very fast speed of unfolding liquidity events.
169. Compared to previous cycles, institutions have made progress in refining methodologies, improving documentation and incorporating resolution-specific assumptions, including modelling of crisis speed and liquidity needs over extended horizons. Authorities ensure scenario relevance through guidance, benchmarking against past crisis experience and dialogue with institutions.
170. At the same time, maturity remains uneven. Authorities continue to highlight limited testing under true resolution conditions. Most of the strategies are reliant on recovery strategies and options, which may be exhausted or not available in a resolution case. Almost all RAs that answered to the survey (22) indicate that they considered the interactions of liquidity scenarios/measures from recovery plans within the liquidity scenarios for resolution (Figure 21).
171. Overall, while scenario frameworks are strengthening compared to previous cycles, further work is needed to ensure their full deployment and consistency.

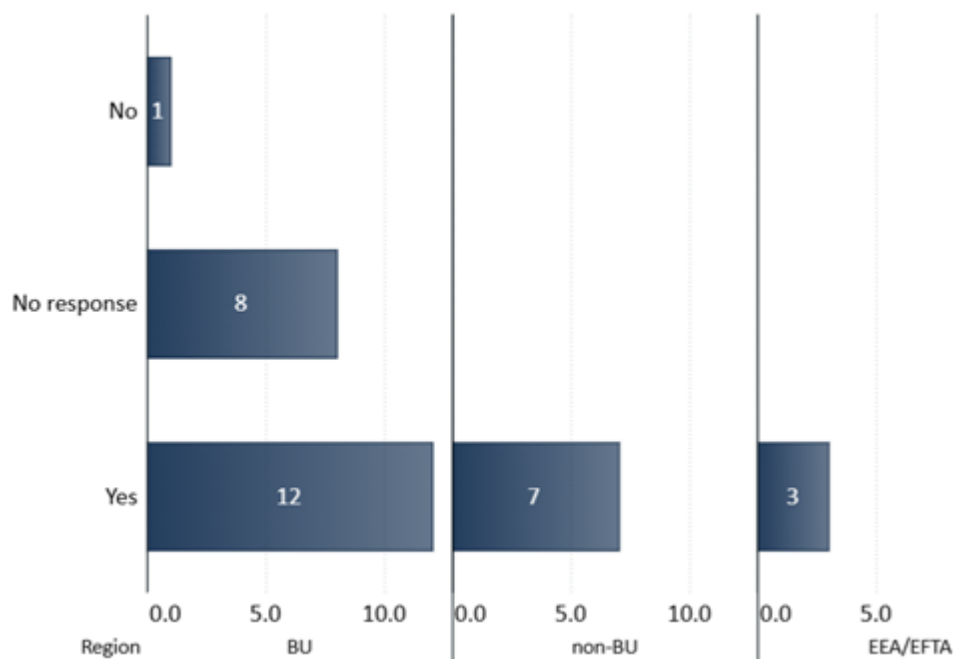


Figure 21: Number of RAs that considered the interaction of liquidity scenarios/measures from recovery plans with the liquidity scenarios for resolution.

3. Digital finance

172. In 2025, supervisory convergence work on digital finance focused on ensuring consistent implementation of the EU's markets in crypto-assets supervisory framework (MiCA)²⁰. In addition, the EBA continuously cooperated and coordinated actions on relevant topics with the other European Supervisory Authorities (ESAs), particularly with regards the implementation of the Digital Operational Resilience Act (DORA), which started applying in January 2025, and the monitoring of innovative applications (including via the joint-ESA European Forum for Innovation Facilitators).

3.1 Supervisory methodologies under MiCA

173. Key activities focused on enhancing supervisory convergence through the development and discussion of common methodologies for risk assessments, as well as approaches to on-site and off-site supervision under MiCA, which operationalise proportionality by providing a consistent framework for supervisory engagement. Particular attention was given to the methodology for assessment and treatment of liquidity risk in e-money token (EMT) multi-issuance models, reflecting their relevance and complexity. Activities also addressed the functioning of supervisory colleges and the use of MiCA intervention powers. The EBA adopted a cooperation framework between the EBA and relevant CAs under MiCA as a tool to foster efficiency and effectiveness in supervision. These activities contributed to a more coherent and effective supervisory approach under MiCA and enhanced the capacity to address relevant risks for complex business models.

3.2 Focus areas for the supervision of ART and EMT issuers

174. The EBA monitored the implementation of agreed supervisory priorities in 2025 covering four areas: 1) internal governance and risk management; 2) financial resilience; 3) technology risk management; 4) financial crime risk management. Supervisors seem to have broadly integrated MiCA expectations into existing prudential, conduct and AML/CFT processes, and have begun to develop operational practices across governance, financial resilience, ICT/DLT risks and financial-crime controls. The EBA identified the following focus areas for the supervision of asset reference token (ART) and EMT issuers in 2026: 1) financial resilience (liquidity risk and own funds); 2) internal governance; 3) conduct, highlighting close cooperation with other authorities (including the European Securities and Markets Authority (ESMA) and the Anti-Money Laundering Authority (AMLA)).

3.3 Crypto classification and convergence

²⁰ Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937 (OJ L 150, 9.6.2023, p. 40, ELI: <http://data.europa.eu/eli/reg/2023/1114/oj>).

175. The EBA issued its first opinion on crypto asset classification under Article 20(5) MiCA in coordination with ESMA, which informed subsequent discussions with CAs on the practical interpretation of ‘referenced value’ in the definitions of ART and EMT under MiCA. Technical discussions addressed supervisory practices related to the eligibility of deposits placed by electronic money institutions issuing EMT with credit institutions using fiduciary deposit structures, issuers holding and using their own tokens for operational purposes, the eligibility of non-MiCA compliant crypto-assets as assets referenced by ARTs and as reserves of assets. This resulted in four new cases being added to the EBA repository of business cases under MiCA for future reference to the CAs. Broader classification challenges under MiCA were also discussed at the TFCCC, including gold-linked token structures whose qualification may vary depending on their design and governance arrangements.

3.4 Dialogue with industry on reporting obligations

176. The EBA organised a joint conference call with ESMA in September 2025, with the participation of industry stakeholders and relevant CAs, to raise awareness of the MiCA data reporting requirements applicable to issuers and crypto-asset service providers (CASPs). The call offered an opportunity to explain the reporting requirements, address implementation-related questions from market participants, and support an open and ongoing dialogue between supervisors and industry on data reporting under MiCA. The call helped build a common understanding of MiCA data reporting obligations to support their timely and consistent implementation across the EU.

3.5 Digital Operational resilience

177. After having published a joint statement in December 2024 to emphasise the importance for financial entities to adopt a robust approach to meet their obligations set out in DORA in a timely manner, the EBA – jointly with the other ESAs – kept engaging with relevant CAs to ensure a consistent approach during the first months of application of DORA.

178. Technical discussions aimed at finding a common understanding for management of ICT-incidents occurring at financial market infrastructures, and in relation to TLPT applications. CAs also discussed the main challenges related to the first month of DORA application leading to identifying common areas for attention for financial entities and CAs alike, notably within ICT third-party risk management and ICT risk management framework.

179. In addition, the EBA and the ESAs devoted attention to the new reporting obligations under DORA, i.e. the Register of Information (RoI) on ICT third-party service providers, and major ICT-related incidents. On the RoI reporting, the ESAs have published and kept updated a large number of clarifications through reports, Q&As, frequently asked questions, workshop materials, outcome of the dry-run exercise, and other documentation. The ESAs also engaged with CAs through the Oversight Forum on the collection of the RoIs. All these actions and measures contributed to the consistent reporting of the RoIs. On major ICT incidents, technical discussions with CAs aimed at improving the data quality and a consistent supervisory approach of the reports submitted by financial entities.

180. Finally, some technical discussions raised awareness on i) the assessment of ICT risks for ART and EMT issuers and the use of DLT technologies; ii) the ICT risk control function and its positioning within the internal governance; iii) the ICT risks connected to the use of AI in the banking sector and in the deployment of some innovative business models, such as white labelling.

3.6 Broader innovation-related activities

181. In 2025, as part of broader financial innovation monitoring activities²¹, the EBA continued to promote convergence toward innovative applications (including novel products, services and business models) via thematic reports and discussions. For example, the EBA completed its thematic report on white labelling,²² concluding that this business model is widely deployed in the EU banking and payments sector. The EBA set out follow-up actions, including to continue to raise supervisory awareness of white labelling, with this topic embedded in the Union Strategic Supervisory Priorities for 2026. To support supervisors in identifying where white labelling is being used, the EBA developed a questionnaire for supervisors to use in the context of day-to-day activities (e.g. on-site supervision). Additionally, the EBA hosted discussions among industry and supervisors of innovative business models, including white labelling, to help promote a common understanding of opportunities, challenges and risks.

182. Another example includes the monitoring of Artificial Intelligence (AI) applications, including General Purpose AI (GPAI), in the EU banking and payments sector. Due to a rapid growth in the application of these technologies in consumer-facing applications²³, in 2025 the EBA hosted a supervisory convergence workshop among industry and supervisors to foster a common understanding of opportunities, challenges and risks, with the publication of high-level outcomes.²⁴ Additionally, in the context of the implementation of the AI Act, the EBA has mapped the AI Act and EU sectoral legislation to support supervisory understanding of the intersection of the legislation and to provide input to the AI Office and the European Commission (EC) for the upcoming Guidelines on the interplay between the AI Act²⁵ and sectoral legislation. Ongoing actions are underway to facilitate convergence discussions regarding AI Act implementation²⁶.

183. More broadly, the EBA continues to facilitate supervisory awareness of innovative applications, across three priority areas: (i) AI/ML, (ii) crypto-assets, distributed ledger technology (DLT) and digital euro, and (iii) value chain evolution²⁷. For example, in 2025 the EBA published, jointly with ESMA, a report on recent developments in crypto-assets, raising supervisory

²¹ The EBA has a legal duty to monitor and assess market developments, including financial innovation, to achieve a coordinated approach and to provide advice to the co-legislators where needed (EBA Founding Regulation, Article 9(2)).

²² <https://www.eba.europa.eu/publications-and-media/press-releases/eba-finds-white-labelling-widely-used-banking-and-payments>

²³ For examples, 55% of EU banks surveyed by the EBA are already using GPAI or agentic AI in consumer-facing processes, such as the detection or notification of suspicious transactions, assisting customer service agents/operators, and automating the provision of information/guidance. See: <https://www.eba.europa.eu/sites/default/files/2025-09/146b3558-d026-47bf-a872-f05e93ed30d2/Rising%20application%20of%20AI%20in%20EU%20banking%20and%20payments%20sector.pdf>.

²⁴ *ibid.*

²⁵ Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act) (OJ L, 2024/1689, 12.7.2024, ELI: <http://data.europa.eu/eli/reg/2024/1689/oj>).

²⁶ <https://www.eba.europa.eu/sites/default/files/2025-11/d8b999ce-a1d9-4964-9606-971bbc2aaf89/AI%20Act%20implications%20for%20the%20EU%20banking%20sector.pdf>

²⁷ <https://www.eba.europa.eu/regulation-and-policy/digital-finance>

awareness of EU customer engagement in activities outside the scope of MICA (e.g. crypto-asset lending and staking, and decentralised finance (DeFi))²⁸. The EBA and ESMA identified that consumer protection and regulatory arbitrage risks exist and supervisors should be mindful of these issues when discharging supervisory tasks, including enforcement and risk monitoring activities. By way of another example, in 2025 the EBA led the joint-ESA BigTech monitoring exercise to support supervisory awareness and knowledge-sharing on BigTechs' direct provision of financial services in the EU²⁹. Eleven of the thirteen BigTech groups in scope of the exercise have subsidiaries carrying out financial services in the EU (primarily payment services, e-money issuance and insurance intermediation). The ESAs will continue monitoring activities and will place particular emphasis on strengthening cross-border and cross-disciplinary supervisory coordination, recognising the potential for BigTechs to further scale their financial activities in the EU.

184. Finally, the EBA continues to contribute to EU-wide training initiatives such as the Supervisory Digital Finance Academy (SDFA)³⁰ and to cross-sectoral thematic discussions at the joint-ESA European Forum for Innovation Facilitators (EFIF) to further foster convergence on innovative applications³¹.

²⁸ <https://www.eba.europa.eu/publications-and-media/press-releases/eba-and-esma-analyse-recent-developments-crypto-assets>

²⁹ <https://www.eba.europa.eu/sites/default/files/2025-10/860310f3-2c06-4795-9244-8eaa624696dc/EFIF%20factsheet%20on%20BigTechs.pdf>

³⁰ https://reforms-investments.ec.europa.eu/technical-support-instrument-0/financial-sector-and-access-finance/eu-supervisory-digital-finance-academy_en

³¹ <https://digital-finance-platform.ec.europa.eu/cross-border-services/facilitators>

4. Consumer protection, payments and conduct

4.1. Consumer protection

185. Supervisory convergence efforts commenced on the existing EBA Guidelines on de-risking³². A compliance assessment involving a sample of 200 financial institutions was launched in 2025, with completion anticipated mid-2026. The outcome of this review will constitute key input for the forthcoming mandated joint EBA-AMLA GLs on de-risking.
186. Additionally, supervisory convergence activities began on the new Credit Servicers Directive³³ (formerly referred to as the Non-Performing Loans (NPL) Directive). The review, scheduled for completion in 2026, will evaluate the compliance of credit servicers operating within the EU with the Directive and aim to establish a common supervisory approach across Member States.
187. Furthermore, the EBA coordinated financial education initiatives of CAs, by publishing in December 2025 a single, integrated information campaign for consumers via, joint EBA, EIOPA and ESMA factsheets on fraud and scams involving crypto-assets and AI. These materials were subsequently translated and reproduced on the websites of all CAs, ensuring broad accessibility for consumers across the EU.

4.2. Payment services

188. In June 2025, a no action letter was published addressing the relationship PSD2³⁴ and MiCA³⁵. The no action letter, among other things, advises supervisors to apply the second authorisation required under PSD2 for a specified subset of crypto asset service providers (CASPs) that transact EMTs only, to do so only after a transition period that ends on 2 March 2026, and then to deprioritise carefully chosen PSD2 provisions that are specified in the letter, in particular PSD2 requirements which overlap with MiCA provisions that have equivalent safeguards. In so doing, the EBA simplified the application of the regulatory framework, preventing divergent interpretations between CAs, which would have undermined the single market and exposed consumers to divergent levels of protection depending on the Member State in which the CASP is authorised. The no action letter was published and submitted to the European Commission in June 2025.

³² [EBA issues Guidelines to challenge unwarranted de-risking and safeguard access to financial services to vulnerable customers | European Banking Authority](#).

³³ Directive (EU) 2021/2167 of the European Parliament and of the Council of 24 November 2021 on credit servicers and credit purchasers and amending Directives 2008/48/EC and 2014/17/EU (OJ L 438, 8.12.2021, p.1, ELI: <http://data.europa.eu/eli/dir/2021/2167/oj>).

³⁴ Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC (OJ L 337, 23.12.2015, p. 35, ELI: <http://data.europa.eu/eli/dir/2015/2366/oj>).

³⁵ [Opinion on the interplay between PSD2 and MiCA.pdf](#)

189. Throughout the year, the repository of supervisory convergence cases under PSD2 was expanded. This was achieved by continuously reviewing cases submitted by CAs, evaluating applicants' business models and reaching consensus on appropriate authorisation procedures.
190. A consistent supervisory dataset on payment fraud in the EU was developed by collecting and publishing fraud statistics from more than 6,000 payment service providers. This dataset, released in December 2025, enhances transparency and supports efforts to combat payment fraud across the EU.

5. Anti-money laundering and countering the financing of terrorism (AML/CFT)

5.1. AML/CFT college monitoring

5.1.1. Background

191. AML/CFT colleges serve as the primary mechanism for cross-border supervisory cooperation within the European Union. Established under Article 57a(4) of AMLD³⁶, these permanent structures facilitate collaboration between CAs responsible for the supervision of financial institutions operating in three or more Member States. They also provide a platform for cooperation with other relevant stakeholders, including the FIUs and third-country authorities.
192. The operational standards for these colleges are defined by the Joint ESAs AML/CFT Colleges Guidelines³⁷, which ensure consistent information exchange and supervisory cooperation.
193. Looking ahead, the existing college framework has been formally enshrined in AMLD6³⁸, ensuring its continuity under the new legislative regime effective July 2027.

5.1.2. AML/CFT colleges landscape

194. As of 31 May 2025, the EU supervisory landscape included **258** active AML/CFT colleges³⁹.
195. Credit institutions accounted for the majority of established colleges (124), followed by investment firms (40), investment funds (39), and payment institutions (23). The life insurance and e-money sectors were less prominent, with 16 and 8 colleges, respectively. Notably, 13 new AML/CFT colleges were established between 2024 and 31 May 2025 (the cut-off date for colleges monitoring in preparation for the transition of EBA's stand-alone AML/CFT powers to the Anti-Money Laundering Authority (AMLA)).

³⁶ Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC (OJ L 141, 5.6.2015, pp. 73–117, ELI: <http://data.europa.eu/eli/dir/2015/849/oj>).

³⁷ Joint ESAs Guidelines (JC 2019 81) on cooperation and information exchange for the purpose of Directive (EU) 2015/849 between competent authorities supervising credit and financial institutions, published in December 2019, [Joint Guidelines on cooperation and information exchange on AML - CFT.pdf](#).

³⁸ Directive (EU) 2024/1640 on the mechanisms to be put in place by Member States for the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Directive (EU) 2019/1937, and amending and repealing Directive (EU) 2015/849 (OJ L, 2024/1640, 19.6.2024, ELI: <http://data.europa.eu/eli/dir/2024/1640/oj>).

³⁹ A slight decrease from the 264 colleges reported in late 2023 due to the merger of certain colleges and the termination of others that were no longer meeting the conditions for setting up a college.

5.1.3. EBA monitoring and support

196. The EBA oversees AML/CFT colleges via annual **general monitoring**, based on annual data collection across all colleges, and **active monitoring**, which involves direct participation by EBA staff in college proceedings. Current data indicates positive engagement levels: FIUs and prudential supervisors participate in 58% and 71% of colleges, respectively. Additionally, international cooperation is expanding, with 22% of colleges having successfully onboarded at least one third-country observer as of May 2025.

197. EBA also identified improvements in the functioning of colleges, inducing:

- **Enhanced governance:** Most colleges demonstrate high levels of organisational efficiency, with lead supervisors effectively facilitating technical discussions.
- **Information flow:** There is an upward trend in the exchange of meaningful, targeted supervisory data.
- **Joint supervisory actions:** Approximately 19% of colleges have progressed to coordinated actions, including joint on-site inspections and aligned remediation strategies.

Despite these gains, two critical areas require further attention:

- **Risk-based resource allocation:** Many authorities have yet to calibrate college frequency and intensity to the specific ML/TF risk profile of the institution.
- **Strategic coordination:** A significant number of colleges fail to systematically identify common risks, limiting their ability to implement unified supervisory responses.

The EBA provided extensive technical support to improve college operations by facilitating the participation of non-EU authorities from Australia, Montenegro, and Serbia following successful confidentiality equivalence assessments. This work was complemented by targeted training sessions designed to share best practices and direct assistance to lead supervisors to ensure the robust implementation of regulatory standards. Furthermore, the EBA enhanced supervisory transparency by sharing critical data on material weaknesses from the EuReCA database to foster a coordinated approach among all college members.

On 1 January 2026, EBA's stand-alone AML/CFT powers moved to the Anti-Money Laundering Authority (AMLA), including responsibilities regarding AML college oversight and equivalence assessments.

5.2. AML implementation reviews

198. Between 2018 and 2024, the EBA reviewed 40 CAs to evaluate their effectiveness in tackling ML/TF risks within the banking sector. The subsequent 2025 stocktake report⁴⁰, which looks at the

⁴⁰ [EBA Final report on Implementation Reviews.pdf](#)

progress made by CAs since their assessment, highlights the following findings regarding supervisory effectiveness and cooperation:

- **Supervisory enhancements:** CAs have implemented formal AML/CFT strategies and updated supervisory manuals to increase consistency and effectiveness. While most authorities now use supervisory tools more strategically, several are still finalising improvements based on EBA recommendations.
- **Domestic cooperation:** Significant efforts were made to coordinate with local FIUs, tax authorities, and other relevant public bodies. However, while domestic arrangements have strengthened overall, certain Member States still require further improvements to ensure seamless information exchange.
- **Prudential and international collaboration:** Most CAs established effective communication with international counterparts and non-EU authorities. Conversely, cooperation with prudential supervisors remains a challenge, with nearly half of the reviewed CAs showing only limited progress in this area.

199. The overall improvement in EU supervisory effectiveness and cooperation highlighted in the report provides a robust foundation for the new AML/CFT framework, equipping AMLA with the vital insights necessary to fulfil its indirect supervision mandate.

5.3. Supervision of crypto-assets sector

200. In October 2025, the EBA published a report summarising lessons learned from actions taken by AML/CFT CAs and the EBA regarding the management of ML/TF risks in the crypto-asset sector during and after the transition to MiCA⁴¹. Key findings and recommendations include:

- **Key vulnerabilities** exploited by entities to bypass oversight, as noted in the report, include unauthorised operations, "forum shopping," the misuse of exemptions, and the use of opaque or complex organizational structures to hide high-risk activities.
- **Regulatory safeguards** introduced by MiCA and the new AML/CFT regime eliminate regulatory gaps by introducing harmonized authorization, strict governance, and mandatory beneficial ownership transparency to ensure a consistent supervisory framework across the EU.
- **Effective implementation** requires CAs to prioritise vigilant monitoring, thorough assessment of legacy risks during licensing, and robust cross-border information sharing to oversee interconnected entities and unauthorized activities.

201. Furthermore, in November 2025, the EBA conducted specialised training for CAs to clarify the prudential and AML/CFT responsibilities regarding CASPs and ART/EMT issuers.

202. While the EBA's standalone AML/CFT powers have transitioned to AMLA, it remains a central figure in combating financial crime through its ongoing MiCA mandate and commitment to supervisory convergence.

⁴¹ [Report on tackling ML TF risks in crypto-asset services through supervision.pdf](#)

5.4. Entity-level ML/TF risk assessments

203. Following a March 2024 Call for Advice⁴² (CfA) from the European Commission, the EBA published its response on 30 October 2025⁴³, including two draft Regulatory Technical Standards (RTS) regarding mandates in accordance with Regulation (EU) 2024/1620 (AMLAR)⁴⁴ on the risk assessment for the purpose of selection for direct supervision and AMLD6 on the methodology for assessing the inherent and residual risk profile of obliged entities.
204. Drawing on implementation reviews, risk opinions and a 2025 supervisory stocktake, the EBA identified significant inconsistencies in how CAs assess entity-level ML/TF risks. To address this, the two draft RTSs establish a unified EU risk assessment methodology by providing standardised data points and a harmonised framework for their analysis. This will ensure comparable supervisory outputs across all Member States and will enable supervisors to develop reliable inspection plans and target resources toward the highest-risk institutions. The proposed methodology provides the operational foundation for the future work of AMLA and promotes supervisory alignment across the EU.

⁴² European Commission's Provisional request for advice to the European Banking Authority (EBA) regarding regulatory technical standards and guidelines under the future anti-money laundering / countering the financing of terrorism (AML/CFT) framework, available https://www.eba.europa.eu/sites/default/files/2024-03/2d15a537-adaa-49ce-8b2a-54467772dfb6/CfA%20RTSs_GL%20EBA_fin_rev.pdf

⁴³ EBA response to the European Commission's Call for Advice on Six AMLA Mandates (EBA/REP/2025/35) <https://www.eba.europa.eu/sites/default/files/2025-10/b5a9a9aa-ce4f-4130-89a7-a19f2e791750/EBA%20response%20to%20EC%20CfA%20on%20six%20AMLA%20mandates%202025%2010%2030.pdf>

⁴⁴ Article 12(7) of Regulation (EU) 2024/1620 of the European Parliament and of the Council of 31 May 2024 establishing the Authority for Anti-Money Laundering and Countering the Financing of Terrorism and amending Regulations (EU) No 1093/2010, (EU) No 1094/2010 and (EU) No 1095/2010 (OJ L, 2024/1620, 19.6.2024, ELI: <http://data.europa.eu/eli/reg/2024/1620/oj>).

6. ESG risk

6.1. Supervision of ESG risks - EBA's engagement with CAs

205. The incorporation of environmental, social and governance (ESG) risks in the prudential supervisory framework for EU credit institutions is relatively recent. The supervision of ESG risks has evolved over the recent years with CAs stepping up their attention to these risks. However, the supervision of ESG risks remains at relatively early stages and the deeper integration of these risks into the supervisory review and evaluation process (SREP) in line with the requirements of the revised Capital Requirements Directive (CRD6)^{45,46}, applicable from January 2026, requires further developments in supervisory approaches.

206. To support CAs in developing and applying consistent supervisory practices, the EBA has initiated and coordinated discussions with its members, complementing the review of the SREP Guidelines which will specify through high-level amendments where ESG risks should be factored into the SREP. The objective of this complementary engagement is to support convergent supervisory practices relating to the implementation of the new regulatory requirements for the supervision of ESG risks. These internal discussions result in offering practical non-binding guidance and tools to CAs on how ESG risks may be taken into account when carrying out the analysis of the four main SREP elements, i.e. the analysis of the business model (element 1), the assessment of internal governance and institution's wide controls (element 2), the assessment of risks to capital (element 3) and the assessment of risks to liquidity and funding (element 4). This includes guidance regarding the supervisory review of the institution's plan to address ESG risks in the short, medium and long term – one significant new aspect of the updated banking package.

207. This engagement initiative will be pursued in 2026. It will not result in setting out additional requirements for CAs. Instead, it aims at facilitating the identification and consideration by CAs of a range of good supervisory practices, methodologies and processes (e.g., ESG risks-related assessment questions, criteria, supervisory tools). This helps in building a common EU understanding of relevant aspects for supervising ESG risks and contributes to supervisors' preparedness for a consistent implementation of CRD6.

6.2 Trainings and workshop

208. The EBA organised one training and one workshop on ESG-related risks in 2025, both targeted at EU supervisors.

209. In June 2025, EBA staff delivered a training on ESG risk management within the ESG policy framework. Recognising that the EU regulatory framework has quickly evolved over recent years

⁴⁵ Article 40(2) of Directive (EU) 2024/1619.

⁴⁶ Article 98(9) of the CRD provides that the review and evaluation performed by CAs shall include the assessment of institutions' governance and risk management processes for dealing with ESG risks, as well as of the institutions' exposures to ESG risks. The review and evaluation shall include the assessment of the institutions' plans to address ESG risks to be prepared in accordance with Article 76(2) of the CRD.

with an increasing explicit incorporation of these risks in the prudential rules, the training described basic concepts and mechanisms relevant to a good understanding of ESG risks, as well as their main challenges and implications for the banking sector. An overview of major ESG policy initiatives, particularly in relation to the banking regulatory and prudential framework, was provided.

210. In addition, attendants delved deeper into the EBA Guidelines on the management of ESG risks published in January 2025 and which specify requirements for banks to identify, assess, manage, and monitor ESG risks, including through specific plans, as required by CRD6. This contributed to capacity building within the supervisory community about the evolving regulatory framework for ESG risks and preparedness for supervisory follow-up.

211. The training was attended by 272 participants and received the highest possible satisfaction score (100).

6.3 Workshop on supervisory approaches to nature-related risks

212. In December 2025, the EBA in collaboration with the Centre for Economic Transition Expertise (CETEx) organised a workshop on supervisory approaches to nature-related risks. Nature degradation is increasingly relevant to institutions and supervisory authorities as it can give rise to, or amplify, traditional financial risks, including credit, market, and operational risks. However, nature-related risks remain underexplored in financial risk frameworks, whilst CRD6 and EBA guidelines should lead to further integration of those risks, including into supervisory practices.

213. In this context, the goal of the workshop was to deepen the understanding and capacity of prudential supervisors in addressing nature-related risks. The workshop spanned foundational knowledge (e.g., key concepts of nature-related risks, micro-financial implications and current bank practices), emerging supervisory practices, regulatory implementation challenges, and the integration of technology in the supervision of environmental risks.

214. The training was attended by 143 participants and received a very high satisfaction score (97).

6.4 International cooperation

215. Finally, the EBA continued its participation in international fora, in particular through engagement with the Network for Greening the Financial System (NGFS), a global voluntary coalition of central banks and supervisors sharing best practices and willing to scale up the financial sector's response to climate and nature challenges. The EBA actively participated in several workstreams such as those focused on the supervision, transition plans and nature-related risks. These activities aim to achieve international convergence in the understanding and supervision of climate and broader nature-related risks.

7. Cross-cutting activities

7.1. Q&As

216. The EBA, together with representatives from CAs, continues to devote considerable resources to its Q&A process, which supports supervisory convergence by clarifying the interpretation and application of EU financial legislation through a structured and transparent mechanism. At the same time, the EBA tries to ensure that applies criteria to ensure that the focused is on Q&As which are most likely to contribute effectively to convergence approach by benefiting a range of stakeholders.
217. In 2024, 387 new Q&As were submitted to the EBA, while 116 Q&As were published and 328 rejected. Over 90% of Q&As categorised as being questions of application for the EBA to answer are now answered or rejected within 7 months. The majority of Q&As submitted in 2025 continue to concern CRD/CRR (297, of which approximately 70% have been rejected), followed by a steady flow of questions on DORA 21 (27). The DORA Q&As have led to increased coordination with ESMA and EIOPA on these topics.
218. In addition, within the EBA Interactive Single Rulebook (ISRB), the texts of the DORA and MiCA Regulations now also display Q&As submitted to the other two ESAs, enhancing ease of access to relevant information and supporting stronger cross-ESAs coordination, to the benefit of stakeholders.

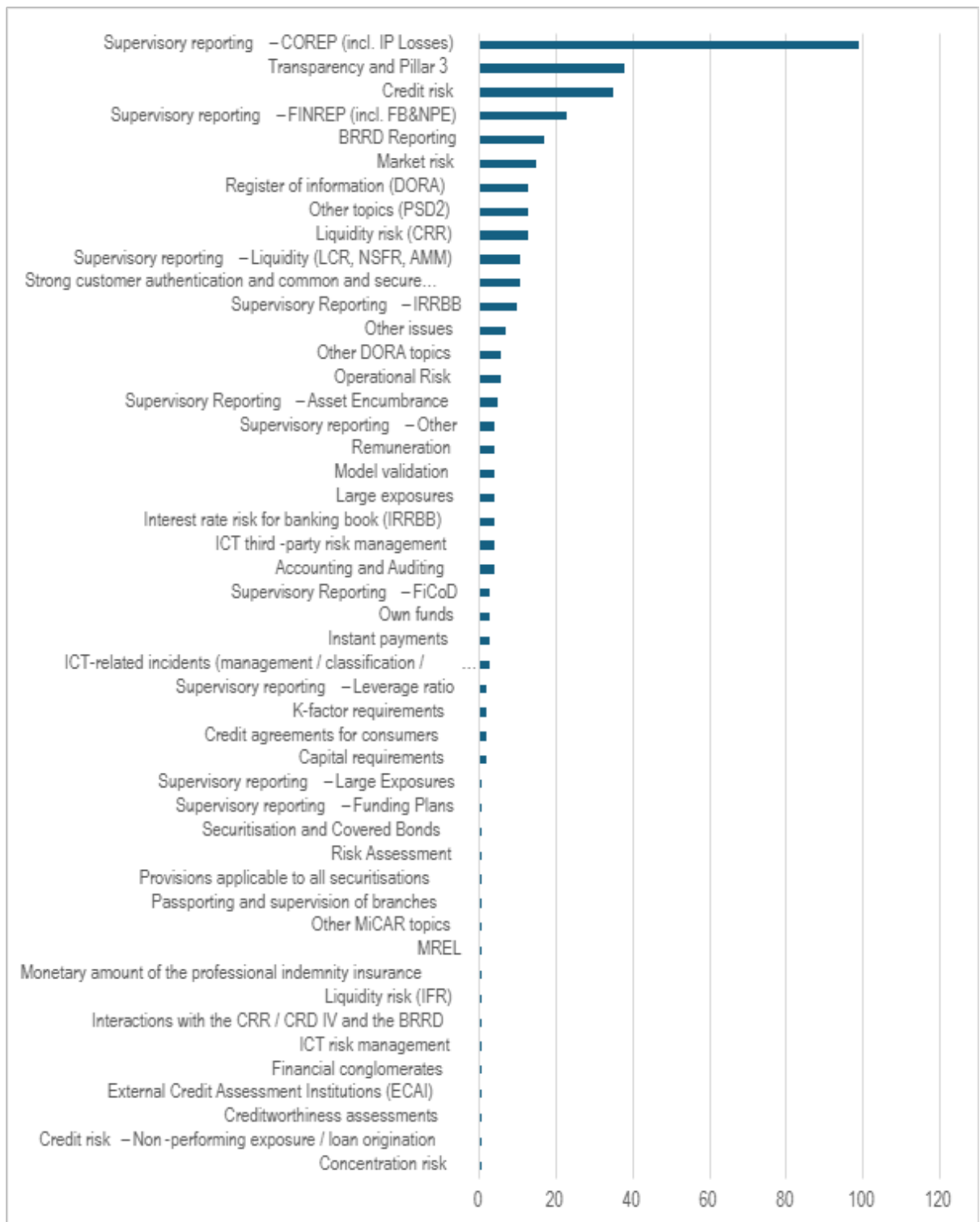


Figure 22: Number of Q&As received in 2025 by topic

7.2. Peer reviews

219. The EBA uses peer reviews to assess and compare the effectiveness of supervisory activities and implementation of supervisory requirements by CAs to further strengthen consistency in supervisory outcomes, including by identifying best practices. The EBA has increased its use of peer reviews to provide a broader assessment of supervisory practices and seeks to focus topics using the EBA's supervisory priorities as well as the EBA's analysis of risks and market developments.
220. In 2025, two initial peer reviews and two follow-up peer reviews pertaining to previously published peer reviews were published. The initial peer reviews continue to aim to strengthen supervisory convergence via choosing a diverse sample of CAs to be reviewed, all while using a risk-based approach which considers the supervisory context in different jurisdictions. The peer reviews give individual recommendations to assessed CAs, as well as more general recommendations to all CAs. The peer reviews also identify best practices CAs can choose to adopt. Follow-up reviews are carried out two years after the conclusion of an initial peer review to assess progress made by the CAs to remedy any deficiencies previously identified.

7.2.1. Peer review on Deposit Guarantee Schemes

221. The report presents the findings of the peer review conducted by EBA on the performance of stress tests by deposit guarantee schemes (DGSs) across the EU. The review assessed how stress tests are performed by seven national DGSs against five benchmarks stemming from Article 4 of the Deposit Guarantee Schemes Directive and the Revised Guidelines on stress tests of deposit guarantee schemes. The assessment and the scores presented in this report are not a judgement on the ability of these DGSs to perform their interventions, but specifically on how they have performed their stress tests in the period under review.
222. Overall, the stress tests have enabled DGSs to strengthen their resilience and preparedness for bank failures. The peer review found that:
- all of the seven DGSs have effectively developed their stress testing programmes in line with the methodology outlined in the guidelines, with only minor shortcomings.
 - five DGSs could fully or largely demonstrate that they have performed all the mandatory core stress tests, using realistic assumptions and conducting objective evaluations. One DGS was only partially compliant as it has not performed any end-to-end simulations, and one was not compliant due to a number of important shortcomings.
 - all seven DGSs have demonstrated effective cooperation with relevant authorities, with robust stress testing of these arrangements. Among the DGSs assessed, four were fully compliant, and three were largely compliant.
 - five DGSs could fully or largely demonstrate increased severity and complexity of their testing scenarios to adequately stress testing their ability to intervene. One could

demonstrate this only partially, and one could not demonstrate increased severity and complexity of the test at all.

- five DGSs could fully or largely demonstrate that they have identified areas for improvement in their systems and have taken or have planned actions to address these areas. Two DGSs could only demonstrate this partially.

223. The report outlines a number of follow-up measures addressed to all the EU DGSs in the areas of: the prompt development of stress tests; the performance of stress test; cooperation; severity and complexity of stress tests; and the identification of areas of improvement.

224. In addition to the detailed review of the seven DGSs, this report also presents an overview summary of the 194 stress tests conducted by all the DGSs in the EU, Norway and Liechtenstein in the 2021-2024 period, highlighting instances where DGSs have not conducted mandatory stress tests, what the results have been, and an overview of improvements identified in the course of the stress tests.

225. The EBA will conduct a follow-up peer review of the implementation of the measures included in the report in two years.

7.2.2. Follow-up Peer Review Report on the exclusion from the CVA risk of transactions with non-financial counterparties established in a third country

226. The report is a follow-up to the EBA 2023 peer review report on excluding transactions with non-financial counterparties established in a third country from CVA risk. The 2023 peer review assessed CAs' supervisory practices regarding the application of the RTS on procedures for excluding transactions with non-financial counterparties established in a third country from the own funds requirements for CVA risk (the Exclusion RTS). More generally, the peer review also assessed how CAs review the transactions in scope of the own funds requirements for CVA risk, and the practices of CAs concerning the supervision of CVA risk, as these were relevant in the context of the Exclusion RTS. The CAs that were assessed in the follow-up review were the same as those that were assessed in the 2023 peer review.

227. The follow-up review found that CAs continue to largely assess CVA risk sufficiently, using different approaches which are fit for purpose in satisfying the regulatory requirements and the EBA SREP Guidelines. Furthermore, since the 2023 peer review report, all CAs made some progress to strengthen their CVA risk assessments and addressed the follow-up measures suggested as part of that report. However, regarding the Exclusion RTS, the review found that only the CA of Hungary (HU) made specific efforts to review the compliance with that RTS. Consequently, the benchmark assessment of CVA Risk Assessment of HU has been upgraded to 'fully applied', while it has been kept as 'largely applied' for the other CAs.

7.2.3. Peer review on gender diversity

228. The EBA reviewed how CAs implemented and supervised the area of gender diversity in the reference period from 1 March 2023 to 31 March 2025 to evaluate compliance with the legal

requirements and effectiveness of supervisory practices. EU legislation requires that credit institutions have robust governance arrangements, including gender-neutral remuneration policies and diversity policies. The internal governance should be appropriate to the nature, scale and complexity of the institution. The main responsibility for internal governance lies with the management body, which is subject to specific suitability requirements.

229. As a basis for the peer review the EBA's 2023 report on the benchmarking of diversity practices and the gender pay gap (EBA/REP/2023/07) was considered. The report had found that despite the legal requirements, a significant proportion of 27.05% of institutions had still not adopted a diversity policy and that only 76.78% (2018; 69.61%) of institutions and 94.39% of significant institutions had a diversity policy that promoted gender diversity by setting a target for the underrepresented gender and recommended that supervisors should take appropriate supervisory measures to ensure that all institutions comply with this legal requirement. More generally, it was found that further improvements of gender balance and of diversity at institutions management bodies were needed and further work by institutions and supervisors to overcome the identified shortcomings.

230. The EBA therefore decided to carry out a peer review in this area to assess supervisory practices. This report sets out the findings of the peer review on the supervision by six supervisors of diversity policies and the implementation of gender diversity at the level of the management body of institutions under their remit. It focuses on the application of the respective requirements in the CRD and EBA Guidelines on the benchmarking of diversity practices including diversity policies and gender pay gap⁴⁷ across six major areas:

1. Effectiveness of integration by supervisors of the requirements on gender diversity policies;
2. Effectiveness of arrangements by supervisors for supervising and reviewing gender diversity policies and their implementation in credit institutions;
3. Effectiveness of implementation of processes for the collection of information on diversity policies;
4. Own benchmarking of diversity policies;
5. Measures taken by supervisors to follow up on the EBA's report on the review of gender-neutral remuneration policies and the diversity benchmarking report;
6. Effective supervision of the requirements on internal governance, aiming at the absence of discrimination, ensuring equal opportunities, reducing the gender-pay gap and improving diversity.

231. The peer review found that by and large most requirements checked have been fully or largely incorporated into the supervisory framework by all supervisors reviewed. The checks on the 'Own benchmarking of diversity policies' resulted in three supervisors being rated 'partially applied'

⁴⁷ [Final report on Guidelines on the diversity benchmarking exercise.pdf](#)

overall, with five out of six supervisors being rated ‘partially applied’ on the second criteria of that benchmark, which concerns the further use of own diversity benchmarking results. The EBA suggests improvements in collecting and publishing supervisors’ benchmarking results to enhance the overview of sector practices and improve the ability of credit institutions to compare with their peers.

232. One supervisor was found not to have taken sufficient measures to follow up on the EBA’s report on the review of gender-neutral remuneration policies and the diversity benchmarking report and had not taken effective supervisory measures on the internal governance of gender neutrality, equal opportunities and improving diversity by credit institutions. While measures to improve were being put in place, the EBA has adopted follow-up measures for that supervisor. A general follow up measure for all supervisors has also been adopted in relation to monitoring of nomination committees’ activities, where it was found that two supervisors only partially met the benchmark.

7.2.4. Follow-up peer review report on authorisations under PSD2

233. The report is a follow-up to the EBA 2023 peer review report on the authorisation of payment institutions and electronic money institutions under PSD2. It assesses the extent to which supervisors have implemented the recommendations from the 2023 Report in areas such as authorisation processes, implementation of the EBA Guidelines on authorisation, governance and internal controls, AML/CFT frameworks, and local substance. The follow-up peer review covered all 29 supervisors assessed in the original review, drawing on their self-assessments and clarifications reviewed by the Peer Review Committee.

234. During 2022-2024, most supervisors saw a decline in new applications compared to 2019-2021, with only a few reporting increases. Application volumes and authorisation timelines continue to vary widely across Member States, ranging between 4-6 months and up to 27 months in one Member State, and with a median duration of 9.5 months excluding that Member State. Delays are most often attributed to incomplete or low-quality applications and the time applicants take to address deficiencies. Other factors include changes during the assessment, business model complexity and, in some cases, staffing constraints or the involvement of multiple authorities. Most supervisors have taken steps to improve efficiency, such as clearer guidance, greater pre application engagement, and streamlined internal procedures, but not all have made material changes, and some continue to report persistent delays.

235. Several supervisors have addressed deficiencies previously identified in the implementation of the EBA Guidelines, notably on business plan assessments and AML/CFT controls, although some gaps remain. Supervisors have also reported tangible improvements in their assessment of applicants’ governance and internal control mechanisms. All but one reported that they apply the three lines of defence model for applicant payment institutions and electronic money institutions in a proportionate manner. Nonetheless, there are still significant differences in how this model, as well as broader governance and internal control requirements, are formalised and implemented across jurisdictions, making it difficult to compare supervisory practices or achieve consistent outcomes.

236. On AML/CFT, several supervisors for which gaps in their practices had been identified in the 2023 Report reported strengthened scrutiny at the authorisation stage. But gaps persist in some supervisors' approaches, notably in ML/TF risk assessment, oversight of branches/agents/distributors, and assessment of the person responsible for AML/CFT compliance. On local substance, all now reported that at the authorisation stage they verify effective management and control from the home Member State. However, expectations on how applicants should demonstrate compliance with this requirement continue to diverge, creating risks of regulatory arbitrage and forum shopping.
237. While there have been notable improvements and a general trend toward convergence, persistent divergences in key areas remain, creating risks of an unlevel playing field and regulatory arbitrage. Further efforts are needed to close remaining AML/CFT gaps and to promote greater convergence in governance, internal control mechanisms, and local substance.

7.3. Breach of Union law investigations, complaints and mediation

238. The EBA conducts breach of Union law investigations to ensure that EU banking regulations are applied consistently across all Member States by CAs. These investigations are triggered when a CA is suspected of failing to apply EU law correctly or at all. The purpose is to uphold the integrity of the EU's Single Rulebook and promote a common supervisory culture. This helps to ensure a level playing field across financial institutions and Member States, strengthens financial stability and enhances credibility and trust in the Union-wide supervisory system.
239. The EBA primarily uses complaints made by stakeholders to identify potential cases, carrying out preliminary enquiries with CAs to determine what action to take where appropriate. In many cases, complaints relate to the activities of financial institutions rather than of CAs, e.g. complaints about payment services not having been provided properly. The EBA does not have the ability to assist in these cases and so complainants are typically referred to the relevant CA, national dispute resolution scheme or other services better suited to assist.
240. The EBA received 115 complaints in 2025 (incl. 42 whistleblowing submissions), with the main topics being linked to fraud, rights to access a bank account and payment issues (including blocking of payment accounts).

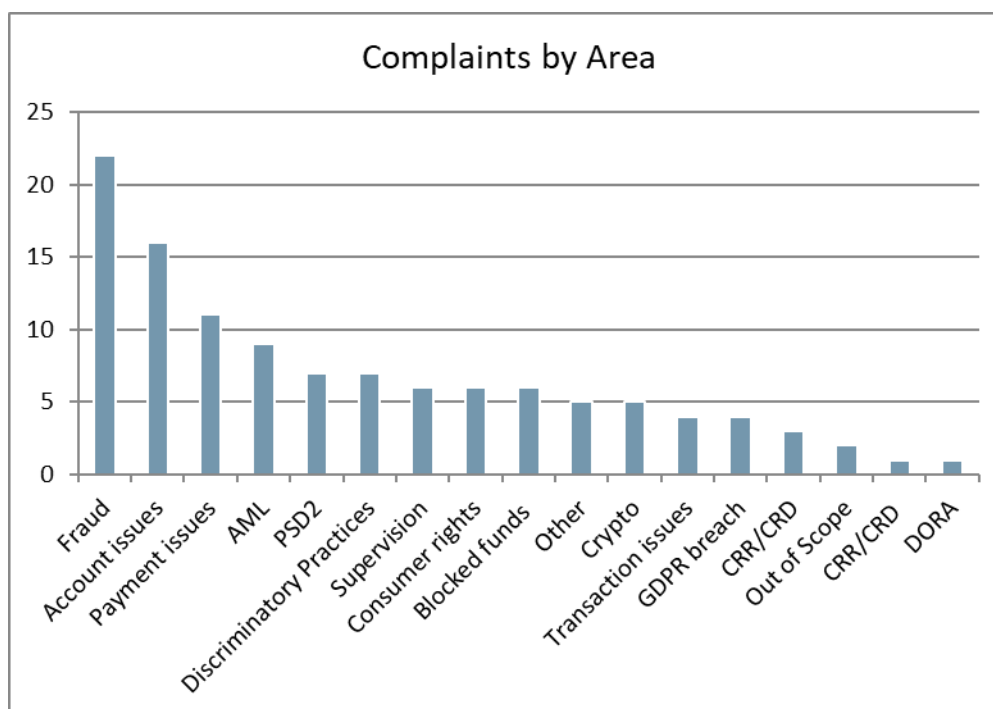


Figure 23: Number of complaints received in 2025 by topic

241. Concerning alleged breaches of Union law attributed to CAs, 21 new cases were opened in 2025, of which 16 were declared inadmissible due to lack of competence or substantiated information. Of the 5 remaining cases, one concerned allegations that the CA failed to properly supervise a credit institution through the SREP process, intervention measures, governance and liquidation. The EBA carried out preliminary enquiries under Article 17(2) of the EBA Founding Regulation, gathered detailed information from the CA, assessed the supervisory actions against the SREP Guidelines and applicable EU law, and determined that the measures taken were proportionate and compliant, and ultimately closed the case without opening a formal investigation.
242. Another case, for which the EBA opened a preliminary inquiry, concerned a complaint alleging that a CA failed in its supervisory duties in relation to a financial fraud involving 52 consumers and a financial institution; the CA argued that the illegal activity was carried out by an unregulated entity outside its supervisory remit, that it acted within its legal powers and that the matter fell under criminal jurisdiction, while the EBA subsequently issued follow-up questions seeking clarification on the CA's supervisory actions with regard to the financial institutions involved (e-money institutions and their agents), awareness of the illegal activities, cooperation with other authorities and handling of related complaints. Preliminary inquiries were launched and enabled the EBA to understand the comprehensive work undertaken by the CA to tackle the matter in a forward-looking manner helping reduce the reproduction of similar fraudulent schemes involving the illegal taking of deposits. This included, amongst others, a three tiered/risk-based payment service providers' (PSPs') agents' registration process, measures strengthening ex-post reviews of PSPs' agents, enhancing due diligence checks and developing industry stakeholders' outreaches.

243. While the EBA holds discretion in closing cases where evidence does not substantiate a breach, it continues to work thoroughly to ensure fair, transparent and proportionate outcomes. In this respect, even after closure, the EBA monitors systemic risks, provides guidance to CAs and encourages improvements in supervisory practices by channelling through its soft law tools or supervisory discussions and workshops, questions and requests to CAs regarding their application of Union law in light of complaints or requests for the opening of investigations.

244. The EBA also plays a mediation role to help resolve disputes between CAs, particularly in the supervision and resolution of cross-border banks, offering both binding and non-binding mediation procedures, aiming to foster cooperation and ensure consistent supervisory decisions. In 2025, the EBA was not contacted to mediate any case between CAs.

7.4. Training programme for competent authorities

245. Each year, the EBA develops a training programme for staff of CAs based on the EBA's work programme and the specific needs expressed by CAs. These offerings include seminars, online courses and collaborative workshops, often hosted via the EBA Learning Hub, and are designed to strengthen supervisory skills, promote best practices and support the implementation of the single rulebook.

246. The training plan for 2025 initially planned for 30 courses. 15 were led by the EBA, 7 in the remit of the Supervisory Digital Finance Academy (SDFA) and 8 cross-sectoral training courses in collaboration with other ESAs. Over the year 10 training courses were postponed and 5 were newly added. Thus, 25 courses could be delivered in 2025, compared to 23 in 2024 and 24 in 2023. Overall, we could welcome 2964 participants in 2025 compared to 3185 participants in 2024 and 4033 in 2023 the previous year.

247. Besides our targeted training offer, the EBA also maintains a learning management system hosting the EBA's online training offer, the SDFA content plus ESMA's training offer on Sustainable Finance. 2024 has seen for the second year in a row exceptional growth. The user base increased from 4780 at the end of 2024 to 6675 users for end 2025, representing a staggering 49% increase. Since the start of 2023 the user base has seen a 220% increase.

248. The number of active courses increased from 193 to 230, or by 19.1 % compared to end 2024. From 2023 an increase of 84% could be observed.

	Start Date	End Date	Format
EBA workshop for EU Supervisors on AML/CFT SupTech	13/01/2025	14/01/2025	Physical
• AI in the financial sector	20/01/2025	14/02/2025	Online
• MiCAR 1st edition	17/03/2025	11/04/2025	Online
• DORA 1st edition	17/03/2025	11/04/2025	Online
EBA/ESE Current and best practices in recovery plan assessment	07/04/2025	08/04/2025	Online
• DORA 2nd edition	28/04/2025	20/05/2025	Online
AML colleges findings	30/04/2025	30/04/2025	Online

	Start Date	End Date	Format
EMT and ART supervision under MICA	08/05/2025	N/A	Online permanent
AML – EURECA Essentials	22/05/2025	22/05/2025	Online
• MiCAR 2nd edition	26/05/2025	20/06/2025	Online
• DORA 3rd edition	26/05/2025	20/06/2025	Online
ESG risk management within the ESG policy framework	12/06/2025	12/06/2025	Online
• EBA Workshop on BigTech	25/06/2025	27/06/2025	Physical
Training on FRTB standardised approach 1	25/06/2025	27/06/2025	Physical
AML – Restricted Measures/Targeted Sanctions	07/07/2025	07/07/2025	Online
AML implementation review findings	09/07/2025	09/07/2025	Online
Mediation	04/09/2025	04/09/2025	Physical
Supervisory Reporting: FINREP & COREP	06/10/2025	30/10/2025	Online
IRRBB seminar – EU framework	17/10/2025	17/10/2025	Online
EBA/ESE Current and best practices in recovery plan assessment	20/10/2025	21/10/2025	Physical
Crypto Training for CA	12/11/2025	12/11/2025	Physical
Training on FRTB standardised approach 2	17/11/2025	19/11/2025	Physical
Workshop on Supervisory Approaches to Nature Related Risks	02/12/2025	02/12/2025	Hybrid

Table 2: Training courses in 2025



Figure 24: Training participants in 2025, excluding SDFAs online events

Annex 1: List of supervisory colleges

EEA home country	Name of cross-border banking group
AT	Addiko Bank
AT	Bausparkasse Wüstenrot
AT	Erste Group
AT	Raiffeisen Bank International AG
BE	KBC Group
BE	FinAx Group
CZ	CREDITAS Group
CZ	J&T Finance Group
DE	Clearstream Financial Holding Group
DE	Deutsche Bank
DE	Commerzbank AG
DE	DZ Bank AG Deutsche Zentral-Genossenschaftsbank
DE	ProCredit Group
DK	Danske Bank
DK	Saxo Bank A/S
EL	National Bank of Greece
ES	BBVA
ES	Banco de Sabadell, S.A.
ES	Grupo Santander
FI	Nordea
FR	BNP Paribas
FR	Crédit Agricole S.A.
FR	Société Générale
FR	ODDO ET CIE
FR	RCI Banque SA
HU	OTP Bank Nyrt
IE	Allied Irish Banks plc

IE	Bank of Ireland Group plc
IT	Intesa Sanpaolo SPA
IT	UniCredit Group
LI	Liechtensteinische Landesbank Group
LI	VPB Group
LU	Banking Circle
NL	Adyen N.V.
NL	Citco Bank Nederland N.V. (CBN)
NL	ING Groep N.V.
NL	Rabobank
NL	Triodos Bank
NO	DNB BANK ASA
PT	Banco Comercial Português, SA
SE	Handelsbanken
SE	Skandinaviska Enskilda Banken (SEB)
SE	Klarna
SE	Swedbank
SI	Nova Ljubljanska Banka (NLB)
45	Total number of colleges for EEA banking groups

Name of third-country banking groups	
	Bank of China
	Citibank Europe plc (CEP)
2 colleges for third-country banking groups	

Annex 2: List of resolution colleges

Table 3: List of resolution colleges

EEA home country	EEA Banking Group / College name
AT	Porsche Bank Group
AT	Erste Group Bank AG
AT	Raiffeisen Bank International AG
BE	FinAx Group
BE	The Bank of New York Mellon SA
BE	KBC Group NV
CZ	CREDITAS B.V.
CZ	JTFG SE Group
DE	Clearstream Holding AG Group
DE	ProCredit Group
DE	Commerzbank Aktiengesellschaft
DE	Deutsche Bank Aktiengesellschaft
DK	Danske Bank
DK	Saxo Bank Group
ES	Banco Bilbao Vizcaya Argentaria, S.A.
ES	Banco Santander, S.A.
ES	Banco de Sabadell, S.A.
FI	Nordea Bank Abp
FR	BNP Paribas S.A.
FR	Crédit Agricole S.A.
FR	Confédération Nationale du Crédit Mutuel
FR	Société Générale S.A.
HU	OTP Bank Nyrt
IE	Allied Irish Banks plc
IE	Bank of Ireland Group plc

IT	Intesa Sanpaolo S.p.A.
IT	UniCredit S.p.A.
LI	Liechtensteinische Landesbank AG (Group)
LI	VP Bank AG (Group)
NL	ING Groep N.V.
NO	DNB Bank ASA
PL	X-Trade Brokers Dom Maklerski S.A. Group
PT	Banco Comercial Português, SA
SE	Skandinaviska Enskilda Banken Group (SEB)
SE	Swedbank Group
SE	Handelsbanken (not active)
SI	Nova Ljubljanska Banka (NLB)
37	Total number of colleges for EEA banking groups

Table 4: List of European resolution colleges (ERC)

Name of third-country banking groups
Goldman Sachs Bank Europe SE
Bank of America Europe Designated Activity Company
Ulster Bank Ireland Designated Activity Company
Citibank Europe plc
Bank of China (Europe) S.A.
JP Morgan SE
Nomura Financial Products Europe GmbH
TOYOTA Kreditbank GmbH
Banque de Patrimoines Privés
Industrial and Commercial Bank of China
10 colleges for third-country banking groups



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