# Annex 1 – Consultation Paper on Guidelines on disclosure requirements

| CRR/CRD requirements | EU Tables and Templates | | Basel Tables and Templates | Fixed format | Flexible format | Quarterly | Semi-annually | Annually | New | Amended | Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Risk management and governance** | | | | | | | | | | | |
| Article 435(1) | Table | EU OVA – Bank risk management approach | OVA | | ✓ | | | ✓ | | ✓ | Redundant content and EBA assessment |
| Article 435(1) | Table | EU CRA – Credit risk management | CRA | | ✓ | | | ✓ | | ✓ | Point (e) moved to another section (legal basis issue) |
| Article 435(1) | Table | EU CCRA – CCR management | CCRA | | ✓ | | | ✓ | | ✓ | Redundant content |
| Article 435(1) | Table | EU MRA – Market risk management | MRA | | ✓ | | | ✓ | | | |
| Article 435(2) | Text | Governance arrangements | None | | ✓ | | | ✓ | ✓ | | CRR specific requirement |
| **Group structure and scope of application** | | | | | | | | | | | |
| Article 436(b) | Template | EU LI1 – Differences between accounting and regulatory scopes of consolidation and mapping of financial statements with regulatory risk categories | LI1 | | ✓ | | | ✓ | | | Clarifications in instructions needed compared to the Basel proposal |
| Article 436(b) | Template | EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements | LI2 | | ✓ | | | ✓ | | ✓ | Clarifications in instructions needed compared to the Basel proposal and EBA assessment |
| Article 436(b) | Template | EU LI 3 - Outlines of the differences in the scope of consolidation – entity by entity | None | | ✓ | | | ✓ | ✓ | | CRR specific requirement |
| Article 436(b) and Article 455(c) | Table | EU LIA – Explanations of differences between accounting and regulatory exposure amounts | LIA | | ✓ | | | ✓ | | ✓ | Alignment of the content to CRR and EBA assessment |
| **Own funds** | | | | | | | | | | | |
| Article 437 | N/A | No table and template in these Guidelines | Phase 2 | | | | | | | | See Commission Implementing Regulation (EU) No 1423/2013 |
| **Capital requirements** | | | | | | | | | | | |
| Article 438(c)-(f) | Template | EU OV1-A – Overview of RWA | OV1 | ✓ | | ✓ | | | | ✓ | Alignment of the content to CRR |
| Article 438(c)-(f) | Template | EU OV1-B Overview by exposure class | OV1 (split) | ✓ | | | ✓ | | ✓ | | CRR specific requirement |
| Article 438(c)-(d) and Article 49(5) | Template | EU INS 1 – Non-deducted participations in insurance undertakings | None | ✓ | | | ✓ | | ✓ | | CRR specific requirement |
| Article 438 last paragraph | Template | EU CR10 – IRB (specialised lending and equities) | CR10 | | ✓ | | ✓ | | | ✓ | Alignment of the content to the CRR and CRR specificities |
| **Macroprudential supervisory measures** | | | | | | | | | | | |
| Article 440 | N/A | No table or template in these Guidelines | Phase 2 | | | | | | | | See Commission Delegated Regulation (EU) 2015/1555 of 28 May 2015 |
| Article 441 | N/A | No table or template in these Guidelines | Phase 2 | | | | | | | | See Commission Implementing Regulation (EU) No 1030/2014 of 29 September 2014, EBA/GL/2014/02 and EBA/GL/2016/01 |
| **Credit risk and credit risk mitigation general information** | | | | | | | | | | | |
| Article 442(a) and (b) | Table | EU CRB-A – Additional disclosure related to the credit quality of assets | CRB | | ✓ | | | ✓ | | ✓ | Alignment of the content to the CRR and redundant content |

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| Article 442(c) | Template | EU CRB-B – Total and average net amount of exposures | None | | ✓ | | | ✓ | ✓ | | CRR specific requirement |
| Article 442(d) | Template | EU CRB-C – Geographical breakdown of exposures | None | | ✓ | | | ✓ | ✓ | | CRR specific requirement |
| Article 442(e) | Template | EU CRB-D – Concentration of exposures by industry or counterparty types | None | | ✓ | | | ✓ | ✓ | | CRR specific requirement |
| Article 442(f) | Template | EU CRB-E – Maturity of exposures | None | | ✓ | | | ✓ | ✓ | | CRR specific requirement |
| Article 442 (c), (g) and (h) | Template | EU CR1-A – Credit quality of exposures by exposure classes and instruments | CR1 | ✓ | | | ✓ | | | ✓ | Alignment of the content to CRR, CRR specific requirement and EBA assessment |
| Article 442(g) | Template | EU CR1-B – Credit quality of exposures by industry or counterparty types | None but necessary for CR1 | ✓ | | | ✓ | | ✓ | | CRR specific requirement and alignment of the content to CRR |
| Article 442(h) | Template | EU CR1-C – Credit quality of exposures by geography | None but necessary for CR1 | ✓ | | | ✓ | | ✓ | | CRR specific requirement and alignment of the content to CRR |
| Article 442(g) and (h) | Template | EU CR1-D – Ageing of past-due exposures | None | | ✓ | | ✓ | | ✓ | | CRR specific requirement and EBA assessment |
| Article 442(g) and (h) | Template | EU CR1-E – Non-performing and forborne exposures | None | | ✓ | | ✓ | | ✓ | | CRR specific requirement and EBA assessment |
| Article 442(i) | Template | EU CR2-A – Changes in stock of general and specific credit risk adjustment | None | ✓ | | | ✓ | | ✓ | | CRR specific requirement and alignment of the content to CRR |
| Article 442(i) | Template | EU CR2-B – Changes in stock of defaulted loans and debt securities | CR2 | ✓ | | | ✓ | | | | Clarifications in instructions |
| Article 453(a)-(e) | Table | EU CRC – Qualitative disclosure requirements related to credit risk mitigation techniques | CRC | | ✓ | | | ✓ | | ✓ | Redundant content and EBA assessment |
| Article 453(f) and (g) | Template | EU CR3 – Credit risk mitigation techniques – overview | CR3 | ✓ | | | ✓ | | | ✓ | Alignment of the content to CRR |
| **Credit risk and credit risk mitigation Standardised approach** | | | | | | | | | | | |
| Article 444(a)-(d) | Table | EU CRD – Qualitative disclosures on banks' use of external credit ratings under the standardised approach for credit risk | CRD | | ✓ | | | ✓ | | ✓ | Redundant content |
| Article 453(f) and (g) | Template | EU CR4 – Standardised approach – credit risk exposure and Credit Risk Mitigation (CRM) effects | CR4 | ✓ | | | ✓ | | | ✓ | Alignment of the content to CRR and EBA assessment |
| Article 444(e) | Template | EU CR5-A – Standardised approach – exposures by asset classes and risk weights | CR5 (split) | ✓ | | | ✓ | | ✓ | ✓ | CRR specific requirement and alignment of the content to CRR |
| Article 444(e) | Template | EU CR5-B – Standardised approach – exposures by asset classes and risk weights | CR5 | ✓ | | | ✓ | | | ✓ | Alignment of the content to CRR |

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| **Credit risk and credit risk mitigation IRB approach** | | | | | | | | | | | |
| Article 452(a)-(c) | Table | EU CRE – Qualitative disclosures related to IRB models | CRE | | ✓ | | | ✓ | | ✓ | Redundant content |
| Article 452(e)-(h) and (j) | Template | EU CR6 – IRB - Credit risk exposures by portfolio and PD range | CR6 | ✓ | | | ✓ | | | ✓ | EBA assessment |
| Article 453(g) | Template | EU CR7 – IRB – Effect on RWA of credit derivatives used as CRM techniques | CR7 | ✓ | | | ✓ | | | ✓ | Alignment of the content to CRR |
| Article 92(3) and 438(d) | Template | EU CR8 – RWA flow statements of credit risk exposures under IRB | CR8 | ✓ | | ✓ | | | | ✓ | Alignment of the content to CRR |
| Article 452(i) | Template | EU CR9 – IRB – Backtesting of probability of default (PD) per portfolio | CR9 | | ✓ | | | ✓ | | | |
| Article 452(i) | Text | Backtesting of model parameters | None | | ✓ | | | ✓ | ✓ | | EBA assessment |
| Article 452(j) | Text | Geographical breakdown of model parameters | None | | ✓ | | | ✓ | ✓ | | CRR specific requirement and EBA assessment |
| **Counterparty credit risk** | | | | | | | | | | | |
| Article 439(e), (f) and (i) | Template | EU CCR1 – Analysis of counterparty credit risk (CCR) exposure by approach | CCR1 | ✓ | | | ✓ | | | ✓ | Alignment of the content to CRR |
| Article 439(e) and (f) | Template | EU CCR2 – Credit valuation adjustment (CVA) capital charge | CCR2 | ✓ | | | ✓ | | | ✓ | Alignment of the content to CRR |
| Article 444(e) | Template | EU CCR3 – Standardised approach of CCR exposures by regulatory portfolio and risk weights | CCR3 | ✓ | | | ✓ | | | ✓ | Alignment of the content to CRR |
| Article 452(e) | Template | EU CCR4 – IRB – CCR exposures by portfolio and PD scale | CCR4 | ✓ | | | ✓ | | | ✓ | EBA assessment |
| Article 439(e) | Template | EU CCR5-A – Impact of netting and collateral held on exposure values | None but necessary for CCR5 | | ✓ | | ✓ | | ✓ | | CRR specific requirement and alignment of the content to CRR |
| Article 439(e) | Template | EU CCR5-B – Composition of collateral for CCR exposure | CCR5 | | ✓ | | ✓ | | | ✓ | Alignment of the content to CRR |
| Article 439(g) and (h) | Template | EU CCR6-A – Credit derivative exposures institution's own credit portfolio | CCR6 | | ✓ | | ✓ | | | ✓ | Alignment of the content to CRR |
| Article 439(g) and (h) | Template | EU CCR6-B – Credit derivatives exposures intermediation activities | CCR6 (split) | | ✓ | | ✓ | | ✓ | | CRR specific requirement and alignment of the content to CRR |
| Article 92(3) and (4) and Article 438(d) | Template | EU CCR7 – RWA flow statements of CCR exposures under the Internal Model Method (IMM) | CCR7 | ✓ | | ✓ | | | | ✓ | Alignment of the content to CRR |
| Article 439(e) and (f) | Template | EU CCR8 – Exposures to central counterparties | CCR8 | ✓ | | | ✓ | | | | |
| **Unencumbered assets** | | | | | | | | | | | |
| Article 443 | N/A | No table or template in these Guidelines | N/A | | | | | | | | See EBA/GL/2014/03 |
| **Market risk** | | | | | | | | | | | |
| Article 105 and Article 455(c) | Table | EU MRB-A – Qualitative disclosure on position measurement | MRB | | ✓ | | | ✓ | ✓ | | CRR specific requirement |

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| Article 445 | Template | EU MR1-A – Market risk own funds requirements | None but necessary for MR1 | ✓ | | | ✓ | | ✓ | | CRR specific requirement |
| Article 445 | Template | EU MR1-B – Market risk under standardised approach | MR1 | ✓ | | | ✓ | | | ✓ | Alignment of the content to CRR |
| Article 455(a) and (b) | Table | EU MRB-B – Qualitative disclosures for banks using the Internal Models Approach (IMA) | MRB | | ✓ | | | ✓ | | | Redundant content and clarifications needed compared to the Basel proposal |
| Article 455(e) | Template | EU MR2-A – Market risk under internal models approach | None | ✓ | | | ✓ | | ✓ | | CRR specific requirement |
| Article 455(e) | Template | EU MR2-B – RWA flow statements of market risk exposures under an IMA | MR2 | ✓ | | ✓ | | | | | Alignment of the content to CRR and clarifications needed compared to the Basel proposal |
| Article 455(d) | Template | EU MR3 – IMA values for trading portfolios | MR3 | ✓ | | | ✓ | | | ✓ | Row moved to EU MR2-A |
| Article 455(g) | Template | EU MR4 – Comparison of VaR estimates with gains/losses | MR4 | | ✓ | | ✓ | | | | |
| **Remuneration** | | | | | | | | | | | |
| Article 450 | N/A | No table or template in these Guidelines | Phase 2 | | | | | | | | See EBA/GL/2015/22 |
| **Leverage ratio** | | | | | | | | | | | |
| Article 451 | N/A | No table or template in these Guidelines | Phase 2 | | | | | | | | See Commission Implementing Regulation (EU) 2016/200 |
| | | | | 26 | 30 | 4 | 34 | 18 | 21 | 28 | |