

Additional Assurance Requirements

2026 contribution period Additional Assurance ("AA")

The objective of this document is to clarify to National Resolution Authorities ("NRAs") and institutions the content and form of the additional assurance requirements ("AAR") on data collected for the 2026 contribution period, along with restatements of past cycles, if any, performed during that contribution period.

This document is divided into the following sections:

- 1. Introduction
- 2. Agreed-upon procedures ("AUP")

AUPs shall include the following annexes to the AUP: ANNEX I – Procedures performed and description of factual findings ANNEX II – Data Reporting Form ("DRF") of the institution



1. Introduction

In order to enhance the comparability of the reported information and the effectiveness of processing the information received, some institutions are requested to provide additional assurance on data to be used in the eventual calculation and collection of 2026 *ex-ante* contributions and of restatements.

- Scope of institutions: requesting additional assurance from all contributing institutions that are part of a group that falls under direct ECB supervision, unless it is subject (only) to the lump-sum payment¹ and has not asked for the alternative contribution².
- Agreed-upon procedures (AUP): institutions in scope must provide confirmation by an auditor on the specific data points indicated. N.B.: The option to use a sign-off by the executive body on the full template is not possible (both for the current cycle and for restatements).
- Scope of AUP: the scope of the AUP includes covered deposits (as a deduction), derivative
 adjustment, intragroup, IPS and promotional loans-related liabilities that qualify for deduction in
 accordance with Article 5(1) of Commission Delegated Regulation (EU) 2015/63 ("the DR"), and own
 funds (the latter data point only for institutions that benefit from a waiver from the competent authority
 for own funds reporting at individual level).
- Discretion of the NRAs: NRAs are empowered with the discretion to extend the scope of institutions and the data covered by the AUP. The NRA should afterwards inform the SRB if this discretion is used.
- Restatements: The AAR apply to restatements of data points in scope of AUP. By way of exception, a (new) AUP report from an auditor on the restated data point is not required under the following conditions: (i) the restatement is due following an auditor's report in a previous cycle where the erroneous data point was identified, and (ii) the same auditor's report expressly mentioned the new value that should be resubmitted for the purpose of calculating the restatement, and (iii) this report is attached to the restated DRF.

In order to ensure that a harmonised approach is taken in all jurisdictions, a template for the engagements to perform AUP regarding financial information is provided in Annex I ('ANNEX I – Procedures performed and description of factual findings') of this document.

This Template is to be used by institutions in the Additional Assurance scope and therefore subject to confirmation by an auditor (i.e. AUP). This document is to be included in the reports of the auditor on the AUP as annex I while the data reporting form (DRF) of the institutions is to be attached as annex II. In addition:

- **Signature and format**: Digital documents and (EU) Qualified Electronic Signature are accepted. The AUP is expected to be in PDF format³.
- Naming convention⁴: the following naming convention shall be used for the AUP: 'MFI LEI AUP 2026' for the 2026 cycle AUP or 'MFI LEI AUP YEAR' in case of restatement.

¹ In accordance with Commission Delegated Regulation (EU) 2015/63 articles 10(1)-(6).

² In accordance with Commission Delegated Regulation (EU) 2015/63 articles 10(7).

³ Use the Print to PDF option and do not send scanned documents.

⁴ MFI refers to MFI Country Code (2 letter ISO code of country where the institution is authorised); LEI refers to Legal Entity Identifier code of the institution.



The application of the 2026 additional assurance requirements is conditional on the actual use by the SRB of the 2026 data set for the calculation and collection of SRF contributions. Institutions should start to prepare for the submission of the additional assurance documents for the 2026 DRF upon notification by the NRA that the condition is fulfilled. Institutions should submit the 2026 additional assurance documents to the NRAs within the deadline defined by the NRA.

Institutions should submit the 2026 AUP at the latest by 15 January 2026 for the DRFs submitted in relation to restatements for the 2016-2023 contribution periods, if any.

The NRAs will retain these documents but should provide them to the SRB upon request.

2. Agreed-upon procedures

This section presents the scope of the AUP engagement (2.1) and describes the engagement letter (2.2) and the report of factual findings (2.3).

2.1 Scope of the AUP engagement

Annex I of this document (which is also Annex I of the AUP) defines the scope of the engagement of the AUP. The procedures are to be performed by an external auditor.

NRAs may decide to adapt or extend some of the procedures due to particularities in their jurisdiction. Such adaptations by NRAs could include, but are not limited to:

- If there are no Institutional Protection Schemes (IPS) in the jurisdiction, the NRA may choose to eliminate procedure 5 from the AUP.
- If, in the jurisdiction, derivatives have to be held on-balance sheet, the NRA may choose under "Procedures 3: Derivative adjustment" to take out the reference to "2C3" and instead introduce the following procedure: "Verify that field "2C3" is equal to 0".
- Due to differences in jurisdictions, the SRB did not specify "underlying documents" to be used during the procedures. Therefore, the NRAs may replace "underlying documents" with the most appropriate reference, e.g. financial statements, balance sheet, derivative sub-ledger and etc.

NRAs may further extend the scope of the AUP, which could include procedures regarding other deductions: amount of qualifying liabilities related to clearing activities, central securities depository and arising by virtue of holding client assets or client money.

The NRAs indicate in the annual overview to the SRB when the template was modified.

2.2 Engagement Letter

An Engagement Letter is used by the institution and the auditor in order to define an engagement by listing all of the procedures to be performed by the auditor (see section 2.1) and to agree that the Report of Factual Findings (see section 2.3) will be distributed only to the relevant third parties (in this case the SRB and the appropriate NRA).

The SRB has not created a template for the Engagement Letter to be signed between the institution and the auditor. Nevertheless, it is presumed that the auditor and the institution will follow the illustrated example in



Appendix 1 of the International Standard on Related Services (ISRS) 4400 (revised) on Engagement to Perform Agreed-upon Procedures Regarding Financial Information.

2.3 Report of Factual Findings

The Report of Factual Findings is the result of the agreed-upon procedure and describes in sufficient detail to the reader the nature and the extent of the work performed.

The SRB has not created a template for the Report of Factual Findings to be prepared by the auditor, but has provided in Annex II of this document a list of minimum requirements for the report based on the illustrated example in Appendix 2 of the International Standard on Related Services (ISRS) 4400 (revised) on Engagement to Perform Agreed-upon Procedures Regarding Financial Information.



ANNEX I – Procedures performed and description of factual findings

Remark: This Annex I shall be attached to the Auditor's AUP $\underline{\text{under the format defined below}}$ (see procedures 1 to 7).

Contributions cycle of reference:

□ 2026 Ex-ante Contributions cycle

In case of restatements, please indicate the contributions cycle concerned:

□ (Please indicate cycle) Ex-ante Contributions cycle

Procedures on 1: General activities

#	Procedure	Finding ⁵ (Yes; No or N/A)	Description factual findings or/and comments
1.1	Obtain the SRF Ex-ante Contributions Data Reporting Form (hereafter DRF) submitted by the institution to the resolution authority in accordance with Article 14 of the Commission Delegated Regulation (EU) 2015/63. Include the DRF as annex to this report.	□ Yes □ No □ N/A	
1.2	Obtain documentation on the procedures used to extract the data and used to perform controls for ensuring that the reported data are in accordance with the instructions in the DRF, the 2026 Guidance ⁶ and other technical guidance provided by the Single Resolution Board or National Resolution Authority.	□ Yes □ No □ N/A	
1.3	Obtain written confirmation from the management ⁷ that the procedures described in the documentation have been implemented and executed.	□ Yes □ No □ N/A	

⁵ 'Yes' means a finding or a discrepancy is to be reported (in that case the data point and the new value shall be clearly highlighted in the next column, and this AUP shall be attached when the corrected Data Reporting Form is submitted). 'No' means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

⁶ Annex of the Board Decision on the data formats, representations, related additional assurance requirements and guidance for institutions reporting information required for the purpose of the 2026 contribution period.

⁷ Thereafter means management body as referred to in Article 88 of the Capital Requirements Directive 2013/36/EU.



Procedures on 2: Covered deposits (data field "2A3") (when not provided and verified by DGS)

#	Procedure	Finding ⁸ (Yes; No or N/A)	If a finding is identified (i.e. 'yes' in previous column) for a procedure relating to the reconciliation and/or recalculation of an amount, please indicate the new value that should be resubmitted (if known by the auditor) ⁹
2.1	Obtain written confirmation from the management of the institution that the legal framework used in identifying deposits for field "2A3" in the DRF is in line with the definition of 'covered deposits' as defined in Article 3(10) of the Commission Delegated Regulation (EU) 2015/63 (i.e. "'covered deposits' means the deposits referred to in Article 6(1) of Directive 2014/49/EU, excluding temporary high balances as defined in Article 6(2) of that Directive.")	□ Yes □ No □ N/A	
2.2	Obtain the reconciliation ¹⁰ of total covered deposits amount to the underlying documents and the field "2A3" in the DRF. Recalculate ¹¹ the total amount in field "2A3" in the DRF. In case of multiple underlying documents, recalculate the total amount in field "2A3" in the DRF from totals on each of the underlying documents.	□ Yes □ No □ N/A	

⁸ 'Yes' means a finding or a discrepancy is to be reported (in that case the data point and the new value shall be clearly highlighted in the next column, and this AUP shall be attached when the corrected Data Reporting Form is submitted). 'No' means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

⁹ The institution is responsible for the reported amount. For procedures not related to the reconciliation and/or recalculation of an amount, please provide further information on the factual findings.

¹⁰ Thereafter means to compare figures in the underlying documents with figures in the DRF.

¹¹ Thereafter means to re-perform the addition of figures in case an institution has performed a summation.



Procedures on 3: Derivative adjustments¹²

3.1	Procedure Obtain written confirmation from the	Finding ¹³ (Yes; No or N/A)	If a finding is identified (i.e. 'yes' in previous column) for a procedure relating to the reconciliation and/or recalculation of an amount, please indicate the new value that should be resubmitted (if known by the auditor) ¹⁴
3.1	management of the institution that the identification of derivatives for the DRF in general, and particularly for fields "2C1", "2C2" and "2C3" is in line with the definition of 'derivatives' in field 2C1 in the DRF.	□ Yes □ No □ N/A	
3.2	Obtain the reconciliation of the total amount of accounting value of liabilities arising from all derivative contracts (excluding credit derivatives) held on- and off-balance sheet to the underlying documents and fields "2C2" and "2C3" in the DRF. Recalculate the total amount in fields "2C2" and "2C3" in the DRF. In case of multiple underlying documents, recalculate the total amount in fields "2C2 and "2C3" in the DRF from the totals on each of the underlying documents.	□ Yes □ No □ N/A	
3.3.1	With regard to the value in field "2C1" of the DRF: Obtain written confirmation from the management of the institution that when identifying the netting agreements in order to report field "2C1" in the DRF, the institution considered only those agreements that are compliant at the reference dates with the conditions referred to in Article 5a to 5e of Commission Delegated Regulation (EU) 2015/63.	□ Yes □ No □ N/A	
3.3.2	Obtain written confirmation from the management of the institution that all liabilities arising from derivative contracts, as defined in field "2C1" of the DRF, were valued in accordance with Articles 5a to 5e of Commission Delegated Regulation (EU) 2015/63 at the reference dates.	□ Yes □ No □ N/A	

¹² Article 5(3) DR. Please note that the DR has been amended by the Commission Delegated Regulation (EU) 2023/662 of 20 January 2023 amending Commission Delegated Regulation (EU) 2015/63 as regards the methodology for the calculation of liabilities arising from derivatives (OJ 22 March 2023).

¹³ 'Yes' means a finding or a discrepancy is to be reported (in that case the data point and the new value shall be clearly highlighted in the next column, and this AUP shall be attached when the corrected Data Reporting Form is submitted). 'No' means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

¹⁴ The institution is responsible for the reported amount. For procedures not related to the reconciliation and/or recalculation of an amount, please provide further information on the factual findings.



3.3.3	Obtain the reconciliation of the total amount	□ Yes	
	of liabilities arising from all derivative contracts	□ No	
	valued in accordance with Articles 5a to 5e of	□ N/A	
	Commission Delegated Regulation (EU)		
	2015/63 to the underlying documents and field		
	"2C1" in the DRF. Recalculate the total amount		
	in field "2C1" in the DRF. In case of multiple		
	underlying documents, recalculate the total		
	amount in fields "2C1" in the DRF from the		
	totals on each of the underlying documents.		

Procedures on 4: Promotional loans deduction (only if an institution applied for the deduction of promotional loans in "Section D" of Deductions tab in the DRF)

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#	Procedure	Finding ¹⁵	If a finding is identified (i.e. 'yes' in
		(Yes; No	previous column) for a procedure
		or	relating to the reconciliation and/or
		N/A)	recalculation of an amount, please
			indicate the new value that should be
			resubmitted (if known by the auditor) ¹⁶
4.1	Only in case an institution qualifies for	□ Yes	
	promotional bank status:	□ No	
	1. Obtain documentation on the basis of	□ N/A	
	which the management of the institution		
	has confirmed that the undertaking or		
	entity was set up by a Member State,		
	central or regional government; and		
	2. Obtain documentation on the basis of		
	which the management of the institution		
	has confirmed that the central or regional		
	government referred to in (4.1.1) has an		
	obligation to protect the economic basis of		
	the undertaking or entity and maintain its		
	viability throughout its lifetime, or directly or		
	indirectly guarantees at least 90% of the		
	original funding of the undertaking or entity.		
4.2	Only in case an institution qualifies for	□ Yes	
	intermediary institution status:	□ No	
	Obtain written confirmation from the	□ N/A	
	management of the institution that the		
	promotional loans reported in field "3D5" of the		
	DRF are not provided as credit to the final		
	customer.		
4.3	Obtain written confirmation from the	□ Yes	
	management of the institution that the	□ No	
	following rule has been documented and	□ N/A	

¹⁵ 'Yes' means a finding or a discrepancy is to be reported (in that case the data point and the new value shall be clearly highlighted in the next column, and this AUP shall be attached when the corrected Data Reporting Form is submitted). 'No' means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

¹⁶ The institution is responsible for the reported amount. For procedures not related to the reconciliation and/or recalculation of an amount, please provide further information on the factual findings.



	implemented when reporting field "3D5" of the DRF: in accordance with Article 5(1)(f) of the Commission Delegated Regulation (EU) 2015/63, 1 EUR of liability in field "3D5" is matched with 1 EUR of promotional loans received (from promotional bank).		
4.4	Obtain written confirmation from the management of the institution that loans that matched liabilities reported in field "3D5" of the	□ Yes □ No □ N/A	
	DRF, fulfil the following conditions: i. granted on a non-competitive basis; ii. granted on a not for profit basis; and iii. promote the public policy objectives of the central or regional government referred to in (4.1.1).	□ N/A	
4.5	Obtain the reconciliation of the total amount of total accounting value of qualifying liabilities that arise from promotion loans to the underlying documents and the field "3D5" in the DRF. Recalculate the total amount in field "3D5" in the DRF. In case of multiple underlying documents, recalculate the total amount in fields "3D5" in the DRF from the totals on each of the underlying documents.	□ Yes □ No □ N/A	

Procedures on 5: IPS deduction (only if an institution applied for deduction of the IPS in "Section E" of Deductions tab in the DRF)

#	Procedure	Finding 17 (Yes; No or N/A)	If a finding is identified (i.e. 'yes' in previous column) for a procedure relating to the reconciliation and/or recalculation of an amount, please indicate the new value that should be resubmitted (if known by the auditor) ¹⁸
5.1	Identification of the scope of application of IPS deductions: 1. Obtain the list of entities that comply with the conditions specified in Article 5(1)(b) of Commission Delegated Regulation (EU) 2015/63 on the relevant reference date; and 2. Obtain written confirmation from the management of the institution that only those institutions identified in (1) have been considered for IPS deduction.	□ Yes □ No □ N/A	
5.2	Deduction of eligible IPS liabilities and assets:	□ Yes	

¹⁷ 'Yes' means a finding or a discrepancy is to be reported (in that case the data point and the new value shall be clearly highlighted in the next column, and this AUP shall be attached when the corrected Data Reporting Form is submitted). 'No' means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

¹⁸ The institution is responsible for the reported amount. For procedures not related to the reconciliation and/or recalculation of an amount, please provide further information on the factual findings.



1.	Obtain a list of IPS liabilities and assets	□ N/A	
	included in fields "3E5" and "3E9" of the		
	DRF as of the reference date and		
	compare it with the list obtained in the		
	procedure (5.1);		
2.			
	management of the institution that the		
	counterparty or appropriate reporting line		
	(e.g. the IPS) has been informed about		
	the liabilities and assets in (5.2.1);		
3.	Obtain the reconciliation of the total		
	accounting value of qualifying IPS		
	liabilities to the underlying documents and		
	the field "3E5" in the DRF. Recalculate		
	the total amount in field "3E5" in the DRF.		
	In case of multiple underlying documents,		
	recalculate the total amount in fields "3E5"		
	in the DRF from the totals on each of the		
	underlying documents;		
4.	Obtain the reconciliation of the total		
	accounting value of qualifying IPS assets		
	held by the qualifying IPS member to the		
	underlying documents and the field "3E9"		
	in the DRF. Recalculate the total amount		
	in field "3E9" in the DRF; and		
5.	Obtain written confirmation from the		
	management of the institution that the		
	following rule has been documented and		
	implemented when filling field "3E10":		
	i. Verification at which value it is booked		
	as a liability by the group counterpart.		
	In case of mismatch, the value booked		
	by the group counterpart as a liability		
	prevails;		
ii.			
	Articles 5a to 5e of Commission		
	Delegated Regulation (EU) 2015/63		
	and verification whether it matches the		
	value after floor calculated by the		
	group counterpart. In case of		
	mismatch, the value calculated by the		
	group counterpart as a liability prevails.		



Procedures on 6: Intragroup deduction (only if an institution applied for the intragroup deduction in "Section F" of Deductions tab in the DRF)

#	Procedure	Finding	If a finding is identified (i.e. 'yes' in
		19	previous column) for a procedure
		(Yes;	relating to the reconciliation and/or
		No or	recalculation of an amount, please
		N/A)	indicate the new value that should be
		,	resubmitted (if known by the auditor) ²⁰
6.1	Identification of the scope of application of		
	intragroup deductions:		
6.1.1	Obtain the list of entities that according to	□ Yes	
	the assessment by the management of the	□ No	
	institution comply with the condition specified	□ N/A	
	in Article 5(1)(a)(iii) of Commission Delegated	_ I II// I	
	Regulation (EU) 2015/63 on the relevant		
	reference date;		
C 4 O	Obtain the list of entities that have been	□ Yes	
6.1.2	identified in (6.1.1) and comply with the		
	conditions specified in Article 5(1)(a)(i) & (ii) of	□ No	
	. , , , , , , , , , , , , , , , , , , ,	□ N/A	
	Commission Delegated Regulation (EU) 2015/63 on the relevant reference date.		
0.4.0			
6.1.3		□ Yes	
	management of the institution that only those	□ No	
	institutions identified in (6.1.2) have been	□ N/A	
	considered for intragroup deduction. Obtain the		
	reconciliation of the qualifying intragroup		
	liabilities arising from derivatives and the field "3F1" in the DRF.		
6.2	Deduction of eligible intragroup liabilities		
	and assets:		
6.2.1	Obtain the list of intragroup liabilities and	□ Yes	
	assets included in fields "3F5" and "3F9" of the	□ No	
	DRF by counterparty and compare that the 5	□ N/A	
	counterparties with the highest total liabilities	-	
	and assets are contained in the list obtained in		
	the procedure (6.1.2);		
6.2.2	Obtain written confirmation from the	□ Yes	
	management of the institution that the	□ No	
	counterparty or appropriate reporting line (e.g.	□ N/A	
	parent company) has been informed about the		
	liabilities and assets in (6.2.1);		
6.2.3	Obtain the reconciliation of the total	□ Yes	
	accounting value of qualifying intragroup	□ No	
	liabilities to the underlying documents and the	□ N/A	
	field "3F5" in the DRF. Recalculate the total		
	amount in field "3F5" in the DRF. In case of		

^{19 &#}x27;Yes' means a finding or a discrepancy is to be reported (in that case the data point and the new value shall be clearly highlighted in the next column, and this AUP shall be attached when the corrected Data Reporting Form is submitted). 'No' means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

²⁰ The institution is responsible for the reported amount. For procedures not related to the reconciliation and/or recalculation of an amount, please provide further information on the factual findings.



6.2.4	multiple underlying documents, recalculate the total amount in fields "3F5" in the DRF from the totals on each of the underlying documents; Obtain the reconciliation of the total accounting value of qualifying intragroup assets to the underlying documents and the field "3F9"	□ Yes	
	in the DRF. Recalculate the total amount in	□ N/A	
6.2.5	field "3F9" in the DRF; Obtain written confirmation from the management of the institution that the following rule has been documented and implemented when filling field "3F10": i. Verification at which value it is booked as a liability by the group counterpart. In case of mismatch, the value booked by the group counterpart as a liability prevails; and When applicable, application of Article 5a to 5e of Commission Delegated Regulation (EU) 2015/63 and verification whether it matches the value after floor calculated by the group counterpart. In case of mismatch, the value calculated by the group counterpart as a liability prevails.	□ Yes □ No □ N/A	

Procedures on 7: Own funds (data field "2A2" DRF) (only applicable in case the institution benefits from a waiver from the competent authority for own funds reporting at individual level)

#	Procedure	Finding 21 (Yes; No or N/A)	If a finding is identified (i.e. 'yes' in previous column) for a procedure relating to the reconciliation and/or recalculation of an amount, please indicate the new value that should be resubmitted (if known by the auditor) ²²
7.1	Obtain from the institution the underlying documents on the calculation of the regulatory capital in accordance to the CRR, recalculate the own funds at individual level and reconcile the amounts used in the calculation to the underlying documents provided by the institution.	□ Yes □ No □ N/A	

²¹ 'Yes' means a finding or a discrepancy is to be reported (in that case the data point and the new value shall be clearly highlighted in the next column, and this AUP shall be attached when the corrected Data Reporting Form is submitted). 'No' means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

²² The institution is responsible for the reported amount.



ANNEX II - Report of Factual Findings

The report of factual findings, in PDF format (naming convention²³ '*MFI_LEI_AUP_2026*' for the 2026 cycle AUP or '*MFI_LEI_AUP_YEAR*' in case of restatement, should contain, at least, the following:

- Title;
- ii. Addressee (ordinarily the client who engaged the auditor to perform the agreed-upon procedures);
- iii. Identification of specific financial or non-financial information to which the agreed-upon procedures have been applied (in this case reference to the 2026 Data Reporting Form);
- iv. A statement that the procedures performed were those agreed upon with the recipient and provided by the NRAs;
- v. A statement that the engagement was performed in accordance with the International Standard on Related Services applicable to agreed-upon procedures engagements, or with relevant national standards or practices;
- vi. When relevant a statement that the auditor is not independent of the entity;
- vii. Identification of the purpose for which the agreed-upon procedures were performed;
- viii. A listing of the specific procedures performed in line with the procedures provided by the NRAs (for this purpose the table defined in Annex I of this document shall be used and attached to the report) as Annex I of the AUP:
- ix. Full Data reporting Form (DRF) of the institution at the year of reference (as Annex II of the AUP);
- x. A description of the auditor's factual findings including exceptions found with sufficient details of errors and the amount calculated by the auditor;
- xi. Statement that the procedures performed do not constitute either an audit or a review and, as such, no assurance is expressed;
- xii. A statement that had the auditor performed additional procedures, an audit or a review, other matters might have come to light that would have been reported;
- xiii. A statement that the report is restricted to those parties that have agreed to the procedures to be performed;
- xiv. A statement (when applicable) that the report relates only to the elements, accounts, items or financial and non-financial information specified and that it does not extend to the entity's financial statements taken as a whole;
- xv. Date of the report;
- xvi. Auditor's address; and
- xvii. Auditor's signature / electronic signature.

²³ MFI refers to MFI Country Code (2 letter ISO code of country where the institution is authorised); LEI refers to Legal Entity Identifier code of the institution.