

Nuovi ITS EBA su modifica dei requisiti di segnalazione di vigilanza e dell'informativa di terzo pilastro per il Rischio Operativo

Principali sfide ed opportunità

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Operational Risk Analytics and Oversight

Group Non-Financial Risks

UniCredit SpA

Milano, 12 giugno 2024

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Agenda

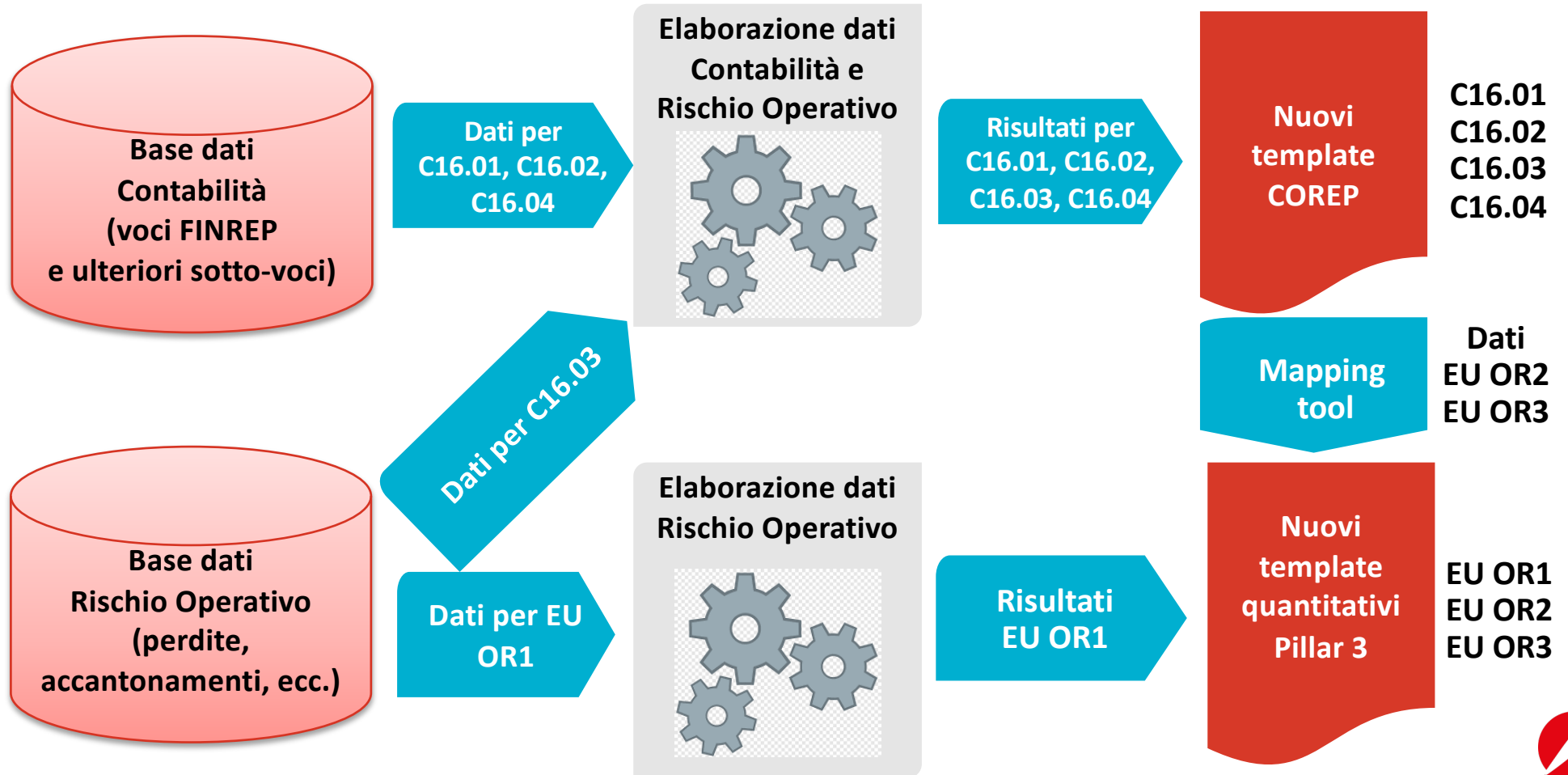
- **Introduzione**
- **Processo di calcolo nuovi template COREP e Pillar 3**
- **Nuovi template COREP**
- **Nuovi template Pillar 3**
- **Conclusioni**



Introduzione

- Il 20 febbraio 2024, l'EBA ha pubblicato tre **Consultation Paper** relativi al rischio operativo:
 - EBA/CP/2024/05:
 - *'Draft Regulatory Technical Standards on the components of the Business indicator under Article 314(6)(a) of the CRR and the elements to be excluded from the Business Indicator under Article 314(6)(b) of the CRR'* definisce le componenti del Business Indicator;
 - *'Draft Implementing Technical Standards on the mapping of the Business Indicator components with corresponding supervisory reporting references under Article 314(7) of the CRR'* definisce un mapping con i conti FINREP (più ulteriori sotto-voci) per il calcolo del Business Indicator;
 - *'Draft Regulatory Technical Standards on the adjustments to the Business Indicator under Article 315(3)(a), (b) and (c) of the CRR'* definisce le modalità con cui può essere modificato il Business Indicator in seguito a M&A e cessioni;
 - EBA/CP/2024/06 – ***'Draft Implementing Technical Standards amending Commission Implementing Regulation (EU) 2021/637 on public disclosures by institutions of the information on operational risk under Article 446 of Regulation (EU) No 575/2013'*** definisce i nuovi template quantitativi e qualitativi ai fini dell'Informativa al Pubblico Pillar 3;
 - EBA/CP/2024/07 – ***'Draft Implementing Technical Standards amending Commission Implementing Regulation (EU) 2021/451 on supervisory reporting under Article 430 (7) of Regulation (EU) No 575/2013 concerning operational risk'*** definisce i nuovi template segnaletici per il reporting all'Autorità di Vigilanza (COREP).
- Le consultazioni si sono chiuse il 21 maggio per EBA/CP/2024/05, ed il 30 aprile per EBA/CP/2024/06 e EBA/CP/2024/07.
- L'invio alla Commissione Europea di EBA/CP/2024/06 e EBA/CP/2024/07, per il processo di rilascio della normativa, è atteso per l'inizio del terzo trimestre 2024. La data di applicazione è 1° gennaio 2025, mentre la **prima data di reporting è 31 marzo 2025**.

Processo di calcolo nuovi template COREP e Pillar 3



Nuovi template COREP



Nuova versione dei template COREP dal Q1 2025

| Reporting template | Frequency | Scope of institutions | |
|--------------------|-------------|--|---|
| C 16.01 | quarterly | All institutions, Ind and Con | Nuovi template su Business Indicator Component |
| C 16.02 | quarterly | All institutions, Ind and Con | |
| C 16.03 | quarterly | All institutions, Ind and Con | |
| C 16.04 | quarterly | Information at subsidiary level | |
| C 17.01 | Semi-annual | Same scope as dec 2024 reporting ; Ind and Con | Template correnti su perdite OpRisk* |
| C 17.02 | Semi-annual | Same scope as dec 2024 reporting; Ind and Con | |

Figura 1 dell'EBA Consultation Paper su Supervisory Reporting.

(*) Solo modifiche marginali. Verranno rivisti successivamente.



Processo di alimentazione dei nuovi template COREP

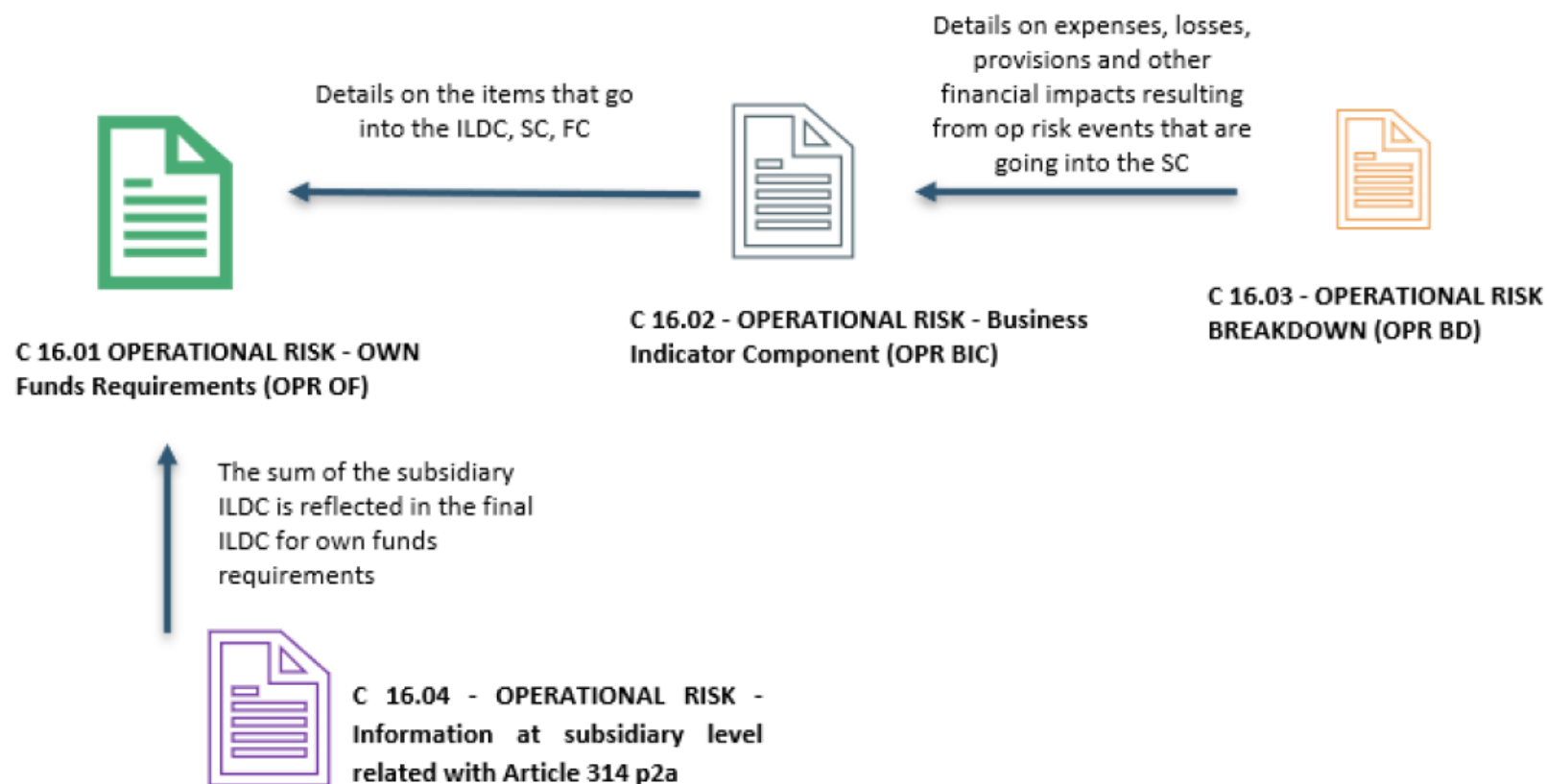


Figura 2 dell'EBA Consultation Paper su Supervisory Reporting



C 16.01 - OPERATIONAL RISK - OWN Funds Requirements (OPR OF)

- Il template C 16.01 è uno schema contenente il valore delle componenti aggregate del BIC, oltre ai valori di Requisiti di Capitale ed RWA.
- Le voci del template sono ottenute come aggregazioni dei valori di dettaglio forniti nei successivi schemi.
- Nel calcolo dell'ILDC sono escluse le componenti legate a deroghe concesse (CRR 3, articoli 314(2a) e 314(2b)), cioè:
 - la possibilità per le società capogruppo dell'UE di calcolare separatamente (previa notifica) l'ILDC per alcune specifiche società controllate, se vengono soddisfatte determinate condizioni (es. le attività della controllata sono concentrate su retail o commercial banking);
 - l'autorizzazione per le società capogruppo dell'UE, già precedentemente autorizzate al metodo standard alternativo, a calcolare separatamente (previa notifica) l'ILDC per le business line retail e commercial banking.

| | | Value | of which: adjustments due to merge/acquisition of entities or activities | (Adjustments due to disposal of entities or activities) | Own fund requirements | Risk exposure amount |
|------|---|---|--|---|--|---|
| | | 0010 | 0020 | 0030 | 0040 | 0050 |
| 0010 | Business indicator component | | | | if {r0020, c0010} <= 1 then 0.12 * {r0020, c0010}; if 1 < {r0020, c0010} <= 30 then 0.12 + 0.15 * {(r0020, c0010) - 1} else 4.47 + 0.18 * ((r0020, c0010) - 30) | = 12,5 * (r0010, c0040) (value reported in CA) |
| 0020 | Business indicator | = sum(0030, 0080, 0090) | = sum(0030, 0080, 0090) | = sum(0030, 0080, 0090) | | |
| 0030 | Interest, leases and dividend component | = sum(0040, 0050, 0060, 0070) | | | | |
| 0040 | ILDC related to the individual institution/consolidated Group (excluding entities considered by Article 314(2a) and/or the business lines considered by Article 314(2b) where applicable) | = min({(C16.02, r0010, c0070); 0,0225 * (C16.02, r0140, c0070)} + {C16.02, r0230, c070}) | | | | |
| 0050 | ILDC for entities considered by Article 314(2a) | = sum(C 16.04; rNNN; c0030) | | | | |
| 0060 | ILDC for the business lines considered by Article 314(2b) (Retail banking) | | | | | |
| 0070 | ILDC for the business lines considered by Article 314(2b) (Commercial banking) | | | | | |
| 0080 | Services component | = max((C16.02, r0250, c0070); (C16.02, r0290, c0070)) + max((C16.02, r0340, c0070); (C16.02, r0370, c0070)) | | | | |
| 0090 | Financial component | = (C16.02, r0400, c0070) + (C16.02, r0450, c0070) | | | | |
| 0100 | Memorandum Item: ILDC related to the Individual institution/consolidated Group (including entities considered by Article 314(2a) and/or including the business lines considered by Article 314(2b)) | | | | | |

C 16.02 - OPERATIONAL RISK - Business Indicator Component (OPR BIC)

- Il template C 16.02 contiene il dettaglio delle voci utilizzate per il calcolo del BIC.
- Vengono riportate le componenti principali del BI, cioè ILDC, SC, FC con le relative sotto-voci.
- Sono riportate le colonne relative agli ultimi tre anni su cui va calcolato il valore medio.
- In caso si applichi il Prudential Boundary Approach (PCA), è necessario alimentare sia le colonne 'Accounting value' che le colonne 'Value - Prudential Boundary Approach' per FC, utilizzando queste ultime per il calcolo del valore medio.

| | | YEAR-3 | | YEAR-2 | | LAST YEAR | | Average Value |
|-------------|---|------------------|--------------------------------------|------------------|--------------------------------------|------------------|--------------------------------------|---------------|
| | | Accounting Value | Value - Prudential Boundary Approach | Accounting Value | Value - Prudential Boundary Approach | Accounting Value | Value - Prudential Boundary Approach | |
| | | 0010 | 0020 | 0030 | 0040 | 0050 | 0060 | 0070 |
| 0010 - 0240 | 1. Interest, leases and dividend component (ILDC) (excluding entities considered by Article 314(2a) or the business lines considered by Article 314(2b)) | | | | | | | |
| 0250 - 0390 | 2. Services component (SC) | | | | | | | |
| 0400 - 0510 | 3. Financial component (FC) | | | | | | | |



C 16.02 - OPERATIONAL RISK - Business Indicator Component

Interest, leases, and dividend component (ILDC) – Interest Component

- Da notare che il template C 16.02 richiede di riportare delle voci con un diverso livello di dettaglio rispetto al mapping del Business Indicator con FINREP riportato nel Consultation Paper EBA/CP/2024/05.
- Ad esempio, la riga '0040 – Interest Income' richiede di riportare la voce {FINREP 02.00, r0010, c0010} che nel mapping del CP EBA/CP/2024/05 corrisponde alla somma delle voci F02.00_r0020_c0010, F02.00_r0025_c0010, F02.00_r0030_c0010, F02.00_r0041_c0010, F02.00_r0051_c0010, F02.00_r0070_c0010, F02.00_r0080_c0010, e F02.00_r0085_c0010.

| | 0010 - 0240 | 1. Interest, leases and dividend component (ILDC) (excluding entities considered by Article 314(2a) or the business lines considered by Article 314(2b)) |
|---|-------------|---|
| ' = sum(abs(0020) for c0010,c0030,c0050))/3 | 0010 | Interest component |
| = 0030 - 0070 | 0020 | Net Income |
| = 0040 + 0050 + 0060 | 0030 | Interest Income (including from leased assets) |
| {FINREP 02.00, r0010, c0010} | 0040 | Interest Income |
| FINREP_F45.3_r0020_c0010 + FINREP_F45.3_r0030_c0010 + FINREP_F45.3_r0010_c0010 (only figures related to leased assets) | 0050 | Income from leased assets other than Interest income |
| FINREP_F02.00_r0425_c0010 (only figures related to leased assets) + FINREP_F45.3_r0040_c0010 (only figures related to leased assets) | 0060 | Profits from leased assets |
| = 0080 + 0090 + 0130 | 0070 | (Interest expenses (including from leased assets)) |
| {FINREP 02.00, r0090, c0010} | 0080 | (Interest expenses) |
| =sum(0100:0120) | 0090 | (Expenses from leased assets other than Interest expenses) |
| FINREP_F02.00_c0010_r0390 (only expenses from leased assets) | 0100 | (Depreciation of leased assets) |
| FINREP_F02.00_c0010_r0460 (only expenses from leased assets) + FINREP_F02.00_c0010_r0520 (only expenses from leased assets) | 0110 | (Impairment or (-) reversal of impairment of leased assets (financial and non-financial assets)) |
| FINREP_F16.8_c0010_r010 + FINREP_F45.3_c0020_r0020 + FINREP_F45.3_c0020_r0030 + FINREP_F45.3_r010_c020 (only figures related to leased assets) | 0120 | (Expenses from operating leases including other administrative expenses related to leased assets) |
| FINREP_F02.00_c010_r425 (only figures related to leased assets) + FINREP_F45.3_r0040_c0020 (only figures related to leased assets) | 0130 | (Losses from leased assets) |

C 16.02 - OPERATIONAL RISK - Business Indicator Component

Interest, leases, and dividend component (ILDC) – Asset & Dividend Components

| | | |
|---|------|--|
| ' = sum(0150 for c0010,c0030,c0050)/3 | 0140 | Asset component |
| '=sum(0160:0190, 0220) | 0150 | Total assets |
| FINREP F18.00 c0005 c0010 | 0160 | Cash balances at central banks and other demand deposits |
| ={FINREP F18.00 r0010 c0010} + {FINREP F18.00 r0181, c0010} + {FINREP F18.00 r0211, c0010} + {FINREP F01.01 r0080, c0010} + {FINREP F01.01 r0094, c0010} | 0170 | Debt securities |
| = {FINREP F18.00 r0070, c0010} + {FINREP F18.00 r0191, c0010} + {FINREP F18.00 r0221, c0010} + {FINREP F01.01 r0090, c0010} + {FINREP F01.01 r0095, c0010} | 0180 | Loans and advances |
| = 0200 + 0210 | 0190 | Derivatives |
| {FINREP F01.01 r0060,c0010} + {FINREP F01.01 r0092, c0010} (only those earning/ bearing interests) | 0200 | Trading and economic hedges |
| {FINREP F01.01 r0240, c0010} (only those earning/ bearing interests) | 0210 | Hedge accounting |
| =FINREP_F21.00_r0010_c0010 + FINREP_F42.00_r0010_c0020+FINREP_F21.00_r0040_c0010 + FINREP_F42.00_r0040_c0020 + FINREP_F21.00_r0070_c0010 + FINREP_F42.00_r0070_c0020 !Here the threshold in Finrep should not apply | 0220 | Assets subject to leases |
| = sum((r0240 for c0010,c0030,c0050))/3 | 0230 | Dividend component |
| FINREP F02.00 r0160 c0010 | 0240 | Dividend income |



C 16.02 - OPERATIONAL RISK - Business Indicator Component Services component (SC)

- Le 'Other operating expenses' sono principalmente guidate dalle voci:
 - 0310 – Totale di perdite, spese, accantonamenti ed altri impatti derivanti da eventi di Rischio Operativo;
 - 0330 – 'Expenses from other expenses' non dovute ad eventi di Rischio Operativo e non dovute a leases.

| | 0250 - 0390 | 2. Services component (SC) |
|--|-------------|--|
| '=sum(sum (r0270:r0280) - r0260, c(0010, 0030, 0050))/3 | 0250 | Other operating income |
| | 0260 | Other operating income from members belonging to the same IPS |
| FINREP_F02.00_r0600_c0010 adj. (If this figure is positive, treat it as profit; if it is negative, treat it as zero) | 0270 | Profit from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations |
| = FINREP F45.03_r0010_c0010 (excluding leased assets) + FINREP F45.03_r0040_c0010 (excluding leased assets) | 0280 | Other |
| '= sum(sum(r0310:r0330) - r0300, c(0010, 0030, 0050))/3 | 0290 | (Other operating expenses) |
| | 0300 | (Other operating expenses from members belonging to the same IPS) |
| = C 16.03_r0060 | 0310 | (Total losses, expenses, provisions and other financial impacts resulting from operational risk events) |
| FINREP_F02.00_r0600_c0010 (If this figure is negative treat it as loss and include without operand; if it is positive, treat it as zero) | 0320 | (Losses from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations) |
| = FINREP F45.03_r0010_c0020 (excluding leased assets) + FINREP F45.03_r0040_c0020 (excluding leased assets or due to operational risk events) | 0330 | (Other) |
| =sum (r0350-r0360,c(0010, c0030, c0050))/3 | 0340 | Fee and commission income |
| FINREP F02.00_r0200_c0010 excluding items under article 314 (5) | 0350 | Fee and commission income (financial statement) |
| | 0360 | of which: from members belonging to the same IPS |
| =sum (r0380 - r0390, c(0010, c0030, c0050))/3 | 0370 | (Fee and commission expenses) |
| FINREP F02.00_r0210, c0010 for the case when a bank reports outsourcing fees paid for the supply of financial services separately in administrative expenses (in Finrep 02_c0010 r 0360 /0380) they would need to be reported here | 0380 | (Fee and commission expenses (financial statement)) |
| | 0390 | (of which: from members belonging to the same IPS) |



C 16.02 - OPERATIONAL RISK - Business Indicator Component

Financial component (FC)

- Se viene utilizzato il Prudential Boundary Approach, sarà necessario compilare tutte le colonne prendendo in considerazione per il calcolo finale solo quelle riferite al Prudential Boundary Approach;
- L'utilizzo del PBA è soggetto a criteri stringenti:
 - Invio notifica ex-ante all'Autorità di Vigilanza almeno 90 giorni prima della sua applicazione;
 - La notifica dovrà includere una dettagliata documentazione, che a sua volta dovrà essere aggiornata annualmente;
 - Una volta che le condizioni di utilizzo non siano più soddisfatte è necessario tornare ad Accounting Approach (AA) per almeno 3 anni.

| | 0400 - 0510 | 3. Financial component (FC) |
|---|-------------|---|
| = sum(abs(0410))/3 for c0010,c0030,c0050 or PBA = sum(abs(0410))/3 for c0020,c0040,c0060 =sum(r0420:r0440) | 0400 | Trading book component |
| FINREP F02.00 r0280 c0010 + FINREP F02.00 r0285 c0010 | 0410 | Net profit or loss applicable to trading book |
| FINREP F02.00 r0300 c0010 (only the TB) | 0420 | Gains or (-) losses on financial assets and liabilities held for trading or trading, net |
| FINREP F02.00 r0310 c0010 (only the TB) | 0430 | Trading book - Gains or (-) losses from hedge accounting, net |
| = sum(abs(0460))/3 for c0010,c0030,c0050 or PBA = sum(abs(0460))/3 for c0020,c0040,c0060 =sum(r0470:r0510) | 0440 | Trading book - Exchange differences [gain or (-) loss], net |
| FINREP F02.00 r0220 c0010 | 0450 | Banking book component |
| FINREP F02.00 r0287 c0010 + FINREP F02.00 r0295 c0010 | 0460 | Net profit or loss applicable to banking book |
| FINREP F02.00 r0290 c0010 | 0470 | Gains or (-) losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss, net |
| FINREP F02.00 r0300 c0010 (only the BB) | 0480 | Gains or (-) losses on non-trading financial assets mandatorily at fair value through profit or loss, net |
| FINREP F02.00 r0310 c0010 (only the BB) | 0490 | Gains or (-) losses on financial assets and liabilities designated at fair value through profit or loss, net |
| | 0500 | Banking book - Gains or (-) losses from hedge accounting, net |
| | 0510 | Banking book - Exchange differences [gain or (-) loss], net |



C 16.03 - OPERATIONAL RISK BREAKDOWN (OPR BD)

Losses, expenses, provisions and other financial impacts resulting from operational risk events

- Il template C 16.03 rappresenta il dettaglio della riga 290 'Other operating expenses' del template C 16.02.
- Viene richiesto il dettaglio perdite, spese, accantonamenti e altri impatti finanziari derivanti da eventi di rischio operativo.
- Il template risulta essere particolarmente impegnativo nella sua compilazione, in quanto richiede di raccordare gli impatti finanziari relativi agli eventi di rischio operativo con le voci contabili utilizzate nel calcolo del Business Indicator.
- Le istruzioni specificano che: *'To avoid doublereporting, institutions shall not report values that are to be reported in other parts of the C 16.02 template, in particular those related to leased assets.'*

| | | | Accounting Value | | | |
|---|------|--|------------------|--------|-----------|------------------|
| | | | YEAR-3 | YEAR-2 | LAST YEAR | |
| | | | 0010 | 0020 | 0030 | |
| Finrep F 45.3 r0040 c0020 other than leased assets and due to operational risk events | 0010 | (Other Operating Expenses due to operational risk events) | | | | =sign (positive) |
| {FINREP F02.00 r0360 c0010 - lease expenses (FINREP_F16.8_c0010_r0100) - outsourcing fees (in case reported in adm expenses) } due to operational risk events | 0020 | (Administrative expenses due to operational risk events) | | | | =sign (positive) |
| (FINREP F02.00 r0390 c0010 - depreciation of leased assets) due to operational risk events | 0030 | (Depreciation due to operational risk events) | | | | =sign (positive) |
| FINREP F02.00 r0430 c0010 (due to operational risk events) | 0040 | (Provisions or (-) reversal of provisions due to operational risk events) | | | | sign = both |
| (Other - lease expenses) due to operational risk events | 0050 | (Other losses, expenses, provisions and other financial impacts due to operational risk events) | | | | sign =both |
| =sum(r0010:r0050) this value will be the one reported in C 16.02 | 0060 | Total losses, expenses, provisions and other financial impacts due to operational risk events | | | | sign =both |

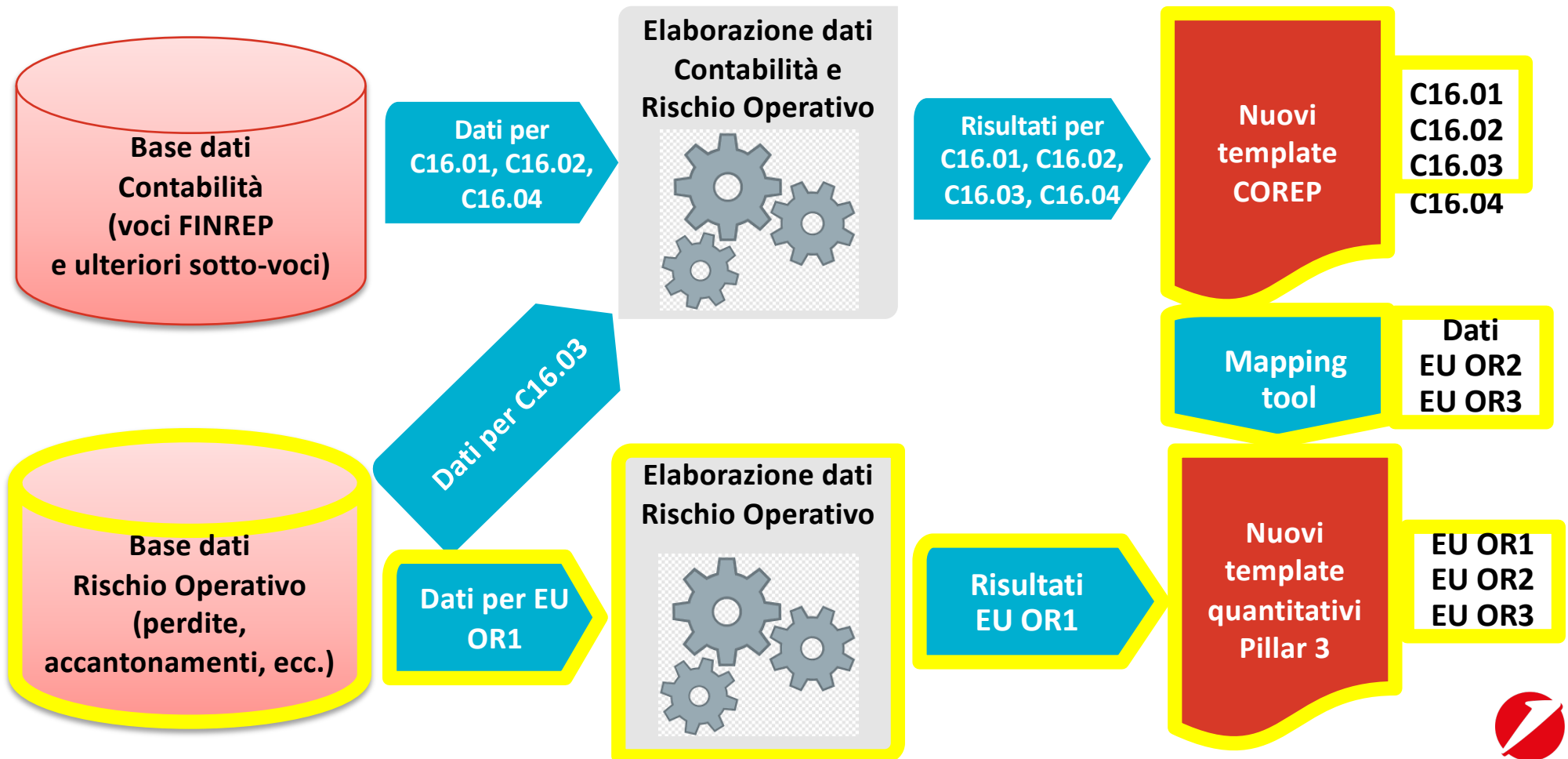
C 16.04 - OPERATIONAL RISK

Information at subsidiary level related with Article 314(2a)

- Il template C 16.04 viene compilato a livello di singola società controllata solo nel caso in cui la società capogruppo decida di applicare la deroga prevista dall'articolo 314 paragrafo 2a.
- L'articolo 314 paragrafo 4 prevede che *'By way of derogation from paragraph 2, an EU parent institution may, until 31 December 2027, request permission from its consolidating supervisor to calculate a separate interest, leases and dividend component for any of its specific subsidiary institutions and sum the outcome of this calculation with the interest leases and dividend component calculated, on a consolidated basis, for the other entities of the group where certain conditions are met'*.
- I gruppi bancari possono, per un certo periodo e previa autorizzazione dell'Autorità di Vigilanza valida due anni, calcolare un ILDC separato per alcune delle loro controllate.
- Entro il 31 dicembre 2031 l'EBA riferirà alla Commissione Europea in merito all'uso e all'adeguatezza di tale deroga, tenendo conto dei modelli commerciali specifici in questione e dell'adeguatezza dei relativi requisiti in materia di fondi propri per il rischio operativo.
- Il numero di righe è variabile in base al numero di società controllate in deroga.
- Le informazioni da riportare, oltre al nome della legal entity e al LEI Code, sono il valore dell'ILDC ripartito tra IC, AC, DC.
- L'appetibilità dell'approccio risiede nel fatto che, per le società controllate in deroga, il valore di IC sia maggiore del 2.25% di AC.
- La somma delle righe riferite all'ILDC dovrà essere riportata nel template aggregato C 16.01 riga 050.

| | Legal Entity name | LEI Code | ILDC | IC | AC | DC |
|------|-------------------|----------|-------------------------|------|------|------|
| Rows | 0010 | 0020 | 0030 | 0040 | 0050 | 0060 |
| ... | | | =min(IC, 0.0225(AC))+DC | | | |

Nuovi template Pillar 3



Nuova versione dei template Pillar 3 dal Q1 2025

| Disclosure template | Frequency* | Scope of institutions | |
|---------------------|------------|-----------------------|-------------------------|
| EU ORA | Annual | Consolidated | } Template qualitativo |
| EU OR1 | Annual | Consolidated | |
| EU OR2 | Annual | Consolidated | } Template quantitativi |
| EU OR3 | Annual | Consolidated | |

(*) Sulla base della frequenza di reporting dei template Pillar 3 EU ORA e EU OR1 correnti.



Table EU ORA - Qualitative information on operational risk

Free format text boxes for disclosure of qualitative information

- Non vengono più richieste informazioni sulle metodologie di calcolo del requisito di capitale AMA e delle coperture assicurative utilizzate nel calcolo.
- Al loro posto, vengono richieste informazioni qualitative su:
 - Struttura della funzione di Rischio Operativo;
 - Sistema di misurazione del Rischio Operativo;
 - Reporting sul Rischio Operativo;
 - Strategie di mitigazione del Rischio Operativo.

| Legal basis | Row number | Qualitative information - Free format |
|--|------------|--|
| Article 446(1)(a) and Article 435(1)(a) CRR | (a) | Disclosure of the risk management objectives and policies |
| Article 446(1)(a) and Article 435(1) (b) CRR | (b) | Disclosure of the structure and organisation of the operational risk management function |
| Article 446(1)(a) and Article 435(1) (c) CRR | (c) | Description of the scope and nature of the measurement system |
| Article 446(1)(a) and Article 435(1) (c) CRR | (d) | Description of the scope and nature of the operational risk reporting framework |
| Article 446(1)(a) and Article 435(1) (d) CRR | (e) | Description of the policies and strategies of the risk mitigation and risk hedge |

Template EU OR1 - Operational risk losses

- Vengono richiesti ammontare e di perdita e numerosità degli eventi sopra le soglie € 20,000 e € 100,000 per gli ultimi 10 anni.
- Si richiedono anche ammontari e numerosità per gli eventi esclusi.
- Il template EU OR1 non trova un corrispettivo nei template COREP.

| | | a | b | c | d | e | f | g | h | i | j | k |
|---------------------------------|--|---|-----|-----|-----|-----|-----|-----|-----|-----|-----|------------------|
| | | T | T-1 | T-2 | T-3 | T-4 | T-5 | T-6 | T-7 | T-8 | T-9 | Ten-year average |
| Using €20,000 threshold | | | | | | | | | | | | |
| 1 | Total amount of operational risk losses net of recoveries (no exclusions) | | | | | | | | | | | |
| 2 | Total number of operational risk losses | | | | | | | | | | | |
| 3 | Total amount of excluded operational risk losses | | | | | | | | | | | |
| 4 | Total number of excluded operational risk events | | | | | | | | | | | |
| 5 | Total amount of operational risk losses net of recoveries and net of excluded losses | | | | | | | | | | | |
| Using €100,000 threshold | | | | | | | | | | | | |
| 6 | Total amount of operational risk losses net of recoveries (no exclusions) | | | | | | | | | | | |
| 7 | Total number of operational risk losses | | | | | | | | | | | |
| 8 | Total amount of excluded operational risk losses | | | | | | | | | | | |
| 9 | Total number of excluded operational risk events | | | | | | | | | | | |
| 10 | Total amount of operational risk losses net of recoveries and net of excluded losses | | | | | | | | | | | |



Template EU OR2 e EU OR3

Business Indicator, components and subcomponents

Operational risk own funds requirements and risk exposure amounts

- Per i template EU OR2 e EU OR3, EBA ha definito un 'Mapping tool' che collega le celle a quelle dei template COREP C16.01, C16.02 e C16.03

EU OR2

| | | a | b | c | d |
|-------------|--|---|---|---|---|
| | BI and its subcomponents | T | T-1 | T-2 | Average value |
| 1 | Interest, lease and dividend component (ILDC) | | | | = {C 16.01, r0030, c0010} |
| EU 1 | ILDC related to the individual institution/consolidated Group (excluding entities considered by Article 314(2a) and/or the business lines considered by Article 314(2b) where applicable) | | | | = {C 16.01, r0040, c0010} |
| 1a | Interest and lease income | = {C 16.02, r0030, c0050} | = {C 16.02, r0030, c0030} | = {C 16.02, r0030, c0010} | = ((C 16.02, r0030, c0010) + {C 16.02, r0030, c0030} + {C 16.02, r0030, c0050}) / 3 |
| 1b | Interest and lease expense | = {C 16.02, r0070, c0050} | = {C 16.02, r0070, c0030} | = {C 16.02, r0070, c0010} | = ((C 16.02, r0070, c0010) + {C 16.02, r0070, c0030} + {C 16.02, r0070, c0050}) / 3 |
| 1c | Total assets/Asset component | = {C 16.02, r0150, c0050} | = {C 16.02, r0150, c0030} | = {C 16.02, r0150, c0010} | = {C 16.02, r0140, c0070} |
| 1d | Dividend income/dividend component | = {C 16.02, r0240, c0050} | = {C 16.02, r0240, c0030} | = {C 16.02, r0240, c0010} | = {C 16.02, r0230, c0070} |
| 2 | Services component (SC) | | | | = {C 16.01, r0080, c0010} |
| 2a | Fee and commission income | = {C 16.02, r0350, c0050} - {C 16.02, r0360, c0050} | = {C 16.02, r0350, c0030} - {C 16.02, r0360, c0030} | = {C 16.02, r0350, c0010} - {C 16.02, r0360, c0010} | = {C 16.02, r0340, c0070} |
| 2b | Fee and commission expense | = {C 16.02, r0380, c0050} - {C 16.02, r0390, c0050} | = {C 16.02, r0380, c0030} - {C 16.02, r0390, c0030} | = {C 16.02, r0380, c0010} - {C 16.02, r0390, c0010} | = {C 16.02, r0370, c0070} |
| 2c | Other operating income | = {C 16.02, r0270, c0050} + {C 16.02, r0280, c0050} - {C 16.02, r0260, c0050} | = {C 16.02, r0270, c0030} + {C 16.02, r0280, c0030} - {C 16.02, r0260, c0030} | = {C 16.02, r0270, c0010} + {C 16.02, r0280, c0010} - {C 16.02, r0260, c0010} | = {C 16.02, r0250, c0070} |
| 2d | Other operating expense | = {C 16.02, r0310, c0050} + {C 16.02, r0320, c0050} + {C 16.02, r0330, c0050} - {C 16.02, r0300, c0050} | = {C 16.02, r0310, c0030} + {C 16.02, r0320, c0030} + {C 16.02, r0330, c0030} - {C 16.02, r0300, c0030} | = {C 16.02, r0310, c0010} + {C 16.02, r0320, c0010} + {C 16.02, r0330, c0010} - {C 16.02, r0300, c0010} | = {C 16.02, r0290, c0070} |
| EU 2e | <i>Memorandum item: Total losses, expenses, provisions and other financial impacts resulting from operational risk events</i> | = {C 16.03, r0060, c0030} | = {C 16.03, r0060, c0020} | = {C 16.03, r0060, c0010} | |



Template EU OR2 e EU OR3

Business Indicator, components and subcomponents

Operational risk own funds requirements and risk exposure amounts

| EU OR2 | 3 | Financial component (FC) | | | | = {C 16.01, r0090, c0010} |
|--------|-------|--|--|--|--|---|
| | 3a | Net profit or loss applicable to trading book (TB) | if EU 3c = accounting approach then {C 16.02, r0410, c0050} else if EU 3c = PBA {C 16.02, r0410, c0060} | if EU 3c = accounting approach then {C 16.02, r0410, c0030} else if EU 3c = PBA {C 16.02, r0410, c0040} | if EU 3c = accounting approach then {C 16.02, r0410, c0010} else if EU 3c = PBA {C 16.02, r0410, c0020} | = {C 16.02, r0400, c0070} |
| | 3b | Net profit or loss applicable to banking book (BB) | if EU 3c = accounting approach then {C 16.02, r0460, c0050} else if EU 3c = PBA {C 16.02, r0460, c0060} | if EU 3c = accounting approach then {C 16.02, r0460, c0030} else if EU 3c = PBA {C 16.02, r0460, c0040} | if EU 3c = accounting approach then {C 16.02, r0460, c0010} else if EU 3c = PBA {C 16.02, r0460, c0020} | = {C 16.02, r0450, c0070} |
| | EU 3c | Approach followed to determine the TB/BB boundary (PBA or accounting approach) | | | | accounting approach or PBA if {C 16.02, r0410 or 0460, c0020 or c0040 or c0060} is NOT empty =>PBA approach else => accounting approach |
| | 4 | Business Indicator (BI) | | | | = {C 16.01, r0020, c0010} |
| | 5 | Business indicator component (BIC) | | | | = {C 16.01, r0010, c0040} |

EU OR2 Disclosure on the BI:

| | | a |
|-------|---|--|
| 6a | BI gross of excluded divested activities | '= {C 16.01, r0020, c0010} + {C 16.01, r0020, c0030} |
| 6b | Reduction in BI due to excluded divested activities | = {C 16.01, r0020, c0030} |
| EU 6c | Impact in BI of mergers/acquisitions | = {C 16.01, r0020, c0020} |

EU OR3

| | | a |
|---|---|----------------------------|
| 1 | Business Indicator Component (BIC) | '= {C 16.01, r0010, c0040} |
| 2 | Internal Loss Multiplier (ILM) | 1 |
| 3 | Minimum Required Operational Risk Own Funds Requirements (OROF) | '= {C 16.01, r0010, c0040} |
| 4 | Operational Risk Exposure Amounts (REA) | = {C 16.01, r0010, c0050} |

Conclusioni

- La compilazione dei nuovi template COREP per il Rischio Operativo, in vigore da marzo 2025, richiede di implementare un'architettura IT in cui vengono **combinati dati provenienti dalle basi dati di Contabilità** (template C 16.01, C 16.02, e C 16.04) **e di Rischio Operativo** (template C 16.03).
- La compilazione del nuovo template COREP C 16.03 richiede di **raccordare la base dati di Rischio Operativo con i conti FINREP presenti nella base dati di Contabilità**. Al momento, le banche non sembrano avere già pronto questo raccordo, per cui si rende necessaria un'analisi ed una conseguente implementazione ad-hoc.
- A questi fini, risulta cruciale la **collaborazione tra funzioni di Rischio Operativo e Contabilità**.
- Le deroghe previste nella CRR 3, articoli 314(2a) e 314(2b), ed Prudential Boundary Approach (PBA), possono costituire delle **opportunità** per contenere l'ammontare del Business Indicator Component.
- La compilazione dei nuovi template Pillar 3 per il Rischio Operativo, a differenza del regime corrente, **non potrà più essere svolta interamente a partire dai template COREP**, poiché il template Pillar 3 EU OR1 non trova (per quanto attualmente previsto) un corrispettivo negli schemi per le segnalazioni di vigilanza. I template Pillar 3 EU OR2 ed EU OR3 potranno invece essere alimentati direttamente dai template COREP in base al 'mapping tool' definito da EBA.
- Dovendo effettuare le prime segnalazioni COREP e Pillar 3 con data di riferimento a marzo 2025, è **necessario procedere al più presto con analisi, implementazioni, test, e parallel run**, senza poter attendere la pubblicazione finale delle normative collegate. Un ulteriore fine-tuning (se necessario) potrà essere apportato dopo tale pubblicazione.

Grazie per l'attenzione!

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