

## **Annex II – Additional Assurance Requirements**

### **2025 contribution period Additional Assurance**

The objective of this document is to clarify to National Resolution Authorities (“NRAs”) and institutions the content and form of the additional assurance requirements on data collected for the 2025 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**

Note: We would like to remind that AUPs shall include the following annexes to the AUP:

- ANNEX I – Procedures performed and description of factual findings (with the layout provided within this document in p.4)
- ANNEX II – Data Reporting Form of the institution

The naming convention of the AUP document is defined in p.2 of this document.

## 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 2025 *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 payment<sup>1</sup> and has not asked for the alternative contribution<sup>2</sup>.
- **Agreed-upon procedures (AUP):** institutions in scope must provide confirmation by an auditor on the specific data points indicated. This applies both for the current cycle and for restatements. *N.B.: The option to use a sign-off by the executive body on the full template is not possible.*
- **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 Additional Assurance Requirements 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 former figure and 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 Agreed Upon Procedures Regarding Financial Information is provided in Annex I (*‘ANNEX I – Procedures performed and description of factual findings’*) in p.4 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 format<sup>3</sup>.
- **Naming convention<sup>4</sup>:** the following naming convention shall be used for the AUP: ‘MFI\_LEI\_AUP\_2025’ for the 2025 cycle AUP or ‘MFI\_LEI\_AUP\_YEAR’ in case of restatement.

The application of the 2025 additional assurance requirements is conditional on the actual use by the SRB of the 2025 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 2025 Data Reporting Form upon notification by the NRA that the condition is fulfilled. Institutions should submit the 2025 additional assurance documents to the NRAs **within the deadline defined by the NRA.**

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

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

<sup>3</sup> Use the Print to PDF option and do not send scanned documents.

<sup>4</sup> 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 conditional approach does not apply to the data submitted in 2025 in relation to restatements for the 2016-2023 contribution periods. **Institutions should submit the 2025 additional assurance documents at the latest by 15 January 2025 for the data reporting forms 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 under the format defined below (see procedures 1 to 7).**

### Contributions cycle of reference:

- 2025 Ex-ante Contributions cycle

### In case of restatements, please select the contributions cycle concerned:

- 2024 Ex-ante Contributions cycle
- 2023 Ex-ante Contributions cycle
- 2022 Ex-ante Contributions cycle
- 2021 Ex-ante Contributions cycle
- 2020 Ex-ante Contributions cycle
- 2019 Ex-ante Contributions cycle
- 2018 Ex-ante Contributions cycle
- 2017 Ex-ante Contributions cycle
- 2016 Ex-ante Contributions cycle

### Procedures on 1: General activities

#	Procedure	Finding <sup>5</sup> (Yes/No/NA) <i>(this column shall not be deleted)</i>	Description factual findings or/and comments <sup>6</sup> <i>(In case a finding has been identified (i.e. 'yes')', please report explicitly the field concerned and the amount that the institution should have reported.)</i>
1.1	<b>Obtain the SRF Ex-ante Contributions Data Reporting Form</b> (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.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
1.2	<b>Obtain documentation on the procedures</b> 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 2025 Guidance <sup>7</sup> and other technical guidance provided by the Single Resolution Board or National Resolution Authority.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
1.3	<b>Obtain written confirmation</b> from the management <sup>8</sup> that the procedures described	<input type="checkbox"/> Yes <input type="checkbox"/> No	

<sup>5</sup> ‘Yes’ means a finding or a discrepancy is to be reported (in that case the data point and the correct amount shall be clearly highlighted in the column ‘Description factual findings or/and comments’, and the corrected Data Reporting Form shall be attached to the AUP. ‘No’ means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

<sup>6</sup> In case a finding has been identified, please report explicitly the field concerned and the amount that the institution should have reported.

<sup>7</sup> 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 2025 contribution period.

<sup>8</sup> Thereafter means management body as referred to in Article 88 of the Capital Requirements Directive 2013/36/EU.

	in the documentation have been implemented and executed.	<input type="checkbox"/> N/A	
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**Procedures on 2: Covered deposits (data field “2A3”) (when not provided and verified by DGS)**

#	Procedure	Finding <sup>9</sup> (Yes/No/NA) <i>(this column shall not be deleted)</i>	Description factual findings or/and comments <sup>10</sup> <i>(In case a finding has been identified (i.e. 'yes)', please report explicitly the field concerned and the amount that the institution should have reported.)</i>
2.1	<b>Obtain written confirmation from the management of the institution</b> 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.”)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
2.2	<b>Obtain the reconciliation<sup>11</sup></b> of total covered deposits amount to the underlying documents and the field “2A3” in the DRF. <b>Recalculate<sup>12</sup></b> 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

<sup>9</sup> ‘Yes’ means a finding or a discrepancy is to be reported (in that case the data point and the correct amount shall be clearly highlighted in the column ‘Description factual findings or/and comments’, and the corrected Data Reporting Form shall be attached to the AUP. ‘No’ means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

<sup>10</sup> In case a finding has been identified, please report explicitly the field concerned and the amount that the institution should have reported.

<sup>11</sup> Thereafter means to compare figures in the underlying documents with figures in the DRF.

<sup>12</sup> Thereafter means to re-perform the addition of figures in case an institution has performed a summation.

Procedures on 3: Derivative adjustments<sup>13</sup>

#	Procedure	Finding <sup>14</sup> (Yes/No/NA) <i>(this column shall not be deleted)</i>	Description factual findings or/and comments <sup>15</sup> <i>(In case a finding has been identified (i.e. 'yes'), please report explicitly the field concerned and the amount that the institution should have reported.)</i>
3.1	<b>Obtain written confirmation from the management of the institution</b> 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 the DRF.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
3.2	<b>Obtain the reconciliation</b> 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. <b>Recalculate</b> 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
3.3.1	<b>With regard to the value in field “2C1” of the DRF:</b> <b>Obtain written confirmation from the management of the institution</b> that when identifying the netting agreements in order to report field “2C1” in the DRF, the institution considered only those agreement that are compliant at the reference dates with the conditions referred to in Article 5a to 5e of Commission Delegated Regulation (EU) 2015/63.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
3.3.2	<b>Obtain written confirmation from the management of the institution</b> 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
3.3.3	<b>Obtain the reconciliation</b> of the total amount of liabilities arising from all derivative contracts valued in accordance with Articles 5a to 5e of Commission Delegated Regulation (EU) 2015/63 to the underlying documents	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

<sup>13</sup> 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).

<sup>14</sup> ‘Yes’ means a finding or a discrepancy is to be reported (in that case the data point and the correct amount shall be clearly highlighted in the column ‘Description factual findings or/and comments’, and the corrected Data Reporting Form shall be attached to the AUP. ‘No’ means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

<sup>15</sup> In case a finding has been identified, please report explicitly the field concerned and the amount that the institution should have reported.

	and field "2C1" in the DRF. <b>Recalculate</b> 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.		
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**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)**

#	Procedure	Finding <sup>16</sup> (Yes/No/NA) <i>(this column shall not be deleted)</i>	Description factual findings or/and comments <sup>17</sup> <i>(In case a finding has been identified (i.e. 'yes'), please report explicitly the field concerned and the amount that the institution should have reported.)</i>
4.1	<b>Only in case an institution qualifies for promotional bank status:</b> 1. <b>Obtain documentation on the basis of which the management of the institution has confirmed</b> that the undertaking or entity was set up by a Member State, central or regional government; and 2. <b>Obtain documentation on the basis of which the management of the institution has confirmed</b> 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
4.2	<b>Only in case an institution qualifies for intermediary institution status:</b> <b>Obtain written confirmation from the management of the institution</b> that the promotional loans reported in field "3D5" of the DRF are not provided as credit to the final customer.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
4.3	<b>Obtain written confirmation from the management of the institution</b> that the following rule has been documented and 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).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

<sup>16</sup> 'Yes' means a finding or a discrepancy is to be reported (in that case the data point and the correct amount shall be clearly highlighted in the column 'Description factual findings or/and comments', and the corrected Data Reporting Form shall be attached to the AUP. 'No' means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

<sup>17</sup> In case a finding has been identified, please report explicitly the field concerned and the amount that the institution should have reported.



4.4	<p><b>Obtain written confirmation from the management of the institution</b> that loans that matched liabilities reported in field “3D5” of the DRF, fulfil the following conditions:</p> <ul style="list-style-type: none"> <li>i. granted on a non-competitive basis;</li> <li>ii. granted on a not for profit basis; and</li> <li>iii. promote the public policy objectives of the central or regional government referred to in (4.1.1).</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
4.5	<p><b>Obtain the reconciliation</b> 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. <b>Recalculate</b> 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.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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 <sup>18</sup> (Yes/No/NA) <i>(this column shall not be deleted)</i>	Description factual findings or/and comments <sup>19</sup> <i>(In case a finding has been identified (i.e. ‘yes’), please report explicitly the field concerned and the amount that the institution should have reported.)</i>
5.1	<p><b>Identification of the scope of application of IPS deductions:</b></p> <ol style="list-style-type: none"> <li>1. <b>Obtain the list of entities</b> that comply with the conditions specified in Article 5(1)(b) of Commission Delegated Regulation (EU) 2015/63 on the relevant reference date; and</li> <li>2. <b>Obtain written confirmation from the management of the institution</b> that only those institutions identified in (1) have been considered for IPS deduction.</li> </ol>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
5.2	<p><b>Deduction of eligible IPS liabilities and assets:</b></p> <ol style="list-style-type: none"> <li>1. <b>Obtain a list of IPS liabilities and assets</b> included in fields “3E5” and “3E9” of the DRF as of the reference date and <b>compare</b> it with the list obtained in the procedure (5.1);</li> <li>2. <b>Obtain written confirmation from the management of the institution</b> that the counterparty or appropriate reporting line (e.g. the IPS) has been</li> </ol>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

<sup>18</sup> ‘Yes’ means a finding or a discrepancy is to be reported (in that case the data point and the correct amount shall be clearly highlighted in the column ‘Description factual findings or/and comments’, and the corrected Data Reporting Form shall be attached to the AUP. ‘No’ means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

<sup>19</sup> In case a finding has been identified, please report explicitly the field concerned and the amount that the institution should have reported.

	<p>informed about the liabilities and assets in (5.2.1);</p> <p>3. <b>Obtain the reconciliation</b> of the total accounting value of qualifying IPS liabilities to the underlying documents and the field “3E5” in the DRF. <b>Recalculate</b> 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;</p> <p>4. <b>Obtain the reconciliation</b> 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. <b>Recalculate</b> the total amount in field “3E9” in the DRF; and</p> <p>5. <b>Obtain written confirmation from the management of the institution</b> that the following rule has been documented and implemented when filling field “3E10”:</p> <ul style="list-style-type: none"> <li>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;</li> <li>ii. <i>When applicable</i>, application of 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.</li> </ul>		
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**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 <sup>20</sup> (Yes/No/NA) <i>(this column shall not be deleted)</i>	Description factual findings or/and comments <sup>21</sup> <i>(In case a finding has been identified (i.e. 'yes'), please report explicitly the field concerned and the amount that the institution should have reported.)</i>
6.1	<b>Identification of the scope of application of intragroup deductions:</b>		

<sup>20</sup> ‘Yes’ means a finding or a discrepancy is to be reported (in that case the data point and the correct amount shall be clearly highlighted in the column ‘Description factual findings or/and comments’, and the corrected Data Reporting Form shall be attached to the AUP. ‘No’ means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

<sup>21</sup> In case a finding has been identified, please report explicitly the field concerned and the amount that the institution should have reported.

6.1.1	<b>Obtain the list of entities that according to the assessment by the management of the institution</b> comply with the condition specified in Article 5(1)(a)(iii) of Commission Delegated Regulation (EU) 2015/63 on the relevant reference date;	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
6.1.2	<b>Obtain the list of entities</b> that have been identified in (6.1.1) and comply with the conditions specified in Article 5(1)(a)(i) & (ii) of Commission Delegated Regulation (EU) 2015/63 on the relevant reference date.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
6.1.3	<b>Obtain written confirmation from the management of the institution</b> that only those institutions identified in (6.1.2) have been considered for intragroup deduction. <b>Obtain the reconciliation</b> of the qualifying intragroup liabilities arising from derivatives and the field “3F1” in the DRF.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
6.2	<b>Deduction of eligible intragroup liabilities and assets:</b>		
6.2.1	<b>Obtain the list of intragroup liabilities and assets</b> included in fields “3F5” and “3F9” of the DRF by counterparty and <b>compare</b> that the 5 counterparties with the highest total liabilities and assets are contained in the list obtained in the procedure (6.1.2);	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
6.2.2	<b>Obtain written confirmation from the management of the institution</b> that the counterparty or appropriate reporting line (e.g. parent company) has been informed about the liabilities and assets in (6.2.1);	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
6.2.3	<b>Obtain the reconciliation</b> of the total accounting value of qualifying intragroup liabilities to the underlying documents and the field “3F5” in the DRF. <b>Recalculate</b> the total amount in field “3F5” in the DRF. In case of multiple underlying documents, recalculate the total amount in fields “3F5” in the DRF from the totals on each of the underlying documents;	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
6.2.4	<b>Obtain the reconciliation</b> of the total accounting value of qualifying intragroup assets to the underlying documents and the field “3F9” in the DRF. <b>Recalculate</b> the total amount in field “3F9” in the DRF;	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
6.2.5	<b>Obtain written confirmation from the management of the institution</b> 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 <i>When applicable</i> , 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

	case of mismatch, the value calculated by the group counterpart as a liability prevails.		
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**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 <sup>22</sup> (Yes/No/NA) <i>(this column shall not be deleted)</i>	Description factual findings or/and comments <sup>23</sup> <i>(In case a finding has been identified (i.e. 'yes'), please report explicitly the field concerned and the amount that the institution should have reported.)</i>
7.1	<b>Obtain from the institution the underlying documents</b> on the calculation of the regulatory capital in accordance to the CRR, <b>recalculate the own funds at individual level</b> and <b>reconcile the amounts</b> used in the calculation to the underlying documents provided by the institution.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

<sup>22</sup> 'Yes' means a finding or a discrepancy is to be reported (in that case the data point and the correct amount shall be clearly highlighted in the column 'Description factual findings or/and comments', and the corrected Data Reporting Form shall be attached to the AUP. 'No' means no finding/ no discrepancy is to be reported, N/A means the procedure is not applicable for the institution.

<sup>23</sup> In case a finding has been identified, please report explicitly the field concerned and the amount that the institution should have reported.

## ANNEX II – Report of Factual Findings

The report of factual findings, in PDF format (naming convention<sup>24</sup> ‘MFI\_LEI\_AUP\_2025’ for the 2025 cycle AUP or ‘MFI\_LEI\_AUP\_YEAR’ in case of restatement, should contain, at least, the following:

- i. 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 2025 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*<sup>25</sup>) 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.

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<sup>24</sup> 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.

<sup>25</sup> In case a finding has been identified, please report explicitly the field concerned and the amount that the institution should have reported.